

The war in Ukraine and associated risks of human trafficking and exploitation

Insights from an evidence-gathering roundtable



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Foreword from the Independent Anti-Slavery Commissioner

‘As the Independent Anti-Slavery Commissioner, I am gravely concerned about the risk of trafficking and exploitation facing those affected by the war in Ukraine. Millions of people have been displaced, many of whom have fled Ukraine. Those seeking refuge abroad, overwhelmingly women and children, face unimaginable risks. To quote UN Secretary General, António Guterres, ‘for predators and human traffickers, the war in Ukraine is not a tragedy. It’s an opportunity – and women and children are the targets.

These risks are not just at the border or along their journey. Earlier conflicts and migration crises have shown the risk of exploitation in destination countries, which for thousands of Ukrainians will be the UK. The Homes for Ukraine scheme in particular has demonstrated the public’s willingness to assist those who have been forcibly displaced. Thousands of individuals, organisations and businesses have offered shelter, support and job opportunities. What we must do now is put in place systematic prevention and protection measures to ensure the risks of trafficking and exploitation do not become a reality.

This comprehensive report outlines the themes from a roundtable organised by UCL and supported by my office. There were many recommendations made in the discussions and many require serious consideration. It is clear that the war in Ukraine presents real and significant risks of human trafficking and exploitation, and there is a need for the UK’s response to be targeted, trauma informed and adequately resourced to provide the support needed to Ukrainian refugees. I have been pleased to support this important work, which I hope will inform both the immediate and long term response. It is also vitally important that the learning extends to future humanitarian crises’

Dame Sara Thornton,
Independent Anti-Slavery Commissioner

27 April 2022

Executive summary

On 24 February 2022 the Russian Federation launched a full-scale invasion of Ukraine. It marked a major escalation in the conflict in Ukraine's Donbas region that has been ongoing since Russia illegally annexed Crimea in 2014. Many millions of people have been displaced both within Ukraine and beyond its borders. Faced with one of the fastest growing refugee situations in recent history, countries across Europe and beyond have taken decisive action to support people fleeing this conflict. In addition to foreign policy responses, such as coordinated international sanctions on Russia, military support and humanitarian aid to Ukraine, both state and non-state actors are increasingly turning their minds to **how to prevent this clear humanitarian crisis from turning into a human trafficking crisis.**

In response to these concerns and the need for evidence to inform policy and practice, UCL and the Office of the Independent Anti-Slavery Commissioner (IASC) convened an international, multi-agency online roundtable on 7 April 2022. The roundtable focused on risks of human trafficking and exploitation arising from the war in Ukraine. The emphasis was on the UK context, situated within lessons and concerns from the broader international landscape. Over **one hundred specialists** participated in the roundtable, including **representatives from civil society, national and transnational governmental organisations, law enforcement, labour market enforcement, healthcare, academia and industry.**

The situation with the war in Ukraine, mass displacement and risks of human trafficking and exploitation is rapidly evolving, meaning that a faster pace of evidence-gathering than normal was needed to inform policy and avert harms. A core strength of our approach is that we were able to convene a large number of international and UK-based experts from different backgrounds, gather credible information on what they are seeing in real-time, listen to their key concerns and recommendations based on years of relevant professional experience, and analyse and synthesise this evidence to present timely policy recommendations on this urgent topic. Despite doing all that at speed, we have maintained a rigorous and transparent approach throughout. Drawing on our research experience and specialist domain knowledge, we were also able to tie this new evidence back to the broader academic and policy evidence-base. We are deeply grateful to all those who shared their knowledge, networks and time to make this endeavour possible, and the Independent Anti-Slavery Commissioner and the UK's Economic and Social Research Council who both immediately recognised the value in this approach.

This report presents key insights from this evidence-gathering roundtable. In it, we identify five major themes from the discussions, situate them within the existing evidence base and identify key policy recommendations for effective responses to human trafficking and exploitation related to the war in Ukraine. Except for invited talks, all discussions at the roundtable were under the Chatham House Rule: to encourage frank discussions on sensitive topics. The event was recorded and transcribed in full. In this report, we try to represent the discussions at the roundtable faithfully and with nuance, highlighting where opinions diverged as well as converged. While we cannot claim to represent the views of *all* participants nor the organisations they represent, we have made every effort to give a faithful and nuanced account of what was said at the roundtable.

Key thematic findings

We identified **five main themes** from the roundtable discussions.

1 Conflict drives human trafficking and exploitation

There is already established evidence that conflict is a driver of human trafficking. There was clear consensus among roundtable participants that the war in Ukraine presents real and significant risks of human trafficking and exploitation, particularly for displaced women and children. New risks specific to this war were seen to interact with existing systemic risks in the UK. Urgent, co-ordinated action was regarded as vital to support *all* refugees from Ukraine, recognising that they are not a homogenous group. Participants called for particular attention to be paid to the needs of especially vulnerable groups, including separated or unaccompanied minors, minority groups, the elderly, and undocumented migrants. The ability of Ukrainian refugees to travel through Europe quickly, safely and cheaply through regular routes and have ready access to the labour market and other social infrastructure were identified as major sources of resilience to human trafficking and exploitation. Non-Ukrainians were identified, in contrast, as falling through the gaps in protections. Overall, risks of human trafficking and exploitation were understood to extend far beyond sexual exploitation alone. Participants stressed that reliable data on the extent and patterns of human trafficking and exploitation linked to the conflict in Ukraine are, understandably, lacking at present. They called for coordinated, nuanced work around prevention, monitoring and support, also emphasising that anti-trafficking interventions must be delivered in a way that does not further harm already marginalised groups or prevent people accessing sanctuary abroad.

2 The UK's visa-based responses to refugees from Ukraine contain risks in terms of human trafficking and exploitation, and need more clarity, resourcing and accountability

In response to mass displacement from Ukraine, the UK Government introduced several Ukraine-specific visa schemes: the *Ukraine Family Scheme* (allowing for reunification with a family member in the UK); *Homes for Ukraine* (the *Ukraine Sponsorship Scheme*, under which members of the public host refugees in their home); and, opening shortly, the *Ukraine Extension Scheme* for certain Ukrainians who are already in the UK on visas unrelated to *Homes for Ukraine* and the *Ukraine Family Scheme*). All three schemes are subject to various eligibility constraints and the system is complex and evolving. Roundtable participants expressed significant concern that there was not enough clarity, consistency, resourcing and accountability in the UK's domestic policy response to Ukraine, raising concerns about the available schemes and their implementation. They identified troubling implications of the UK's visa-based response, both in terms of Ukrainian refugees' welfare in general and risks of human trafficking and exploitation more specifically. The UK's requirement for visas for Ukrainian refugees was widely regarded as creating and heightening risks of human trafficking and exploitation. Some potential benefits in terms of monitoring were flagged, although participants were typically not convinced that it was worth the trade-off. Professionals spoke of struggling themselves to make sense of a system they described as chaotic, fragmented and confusing. Major concerns were raised around the lack of information and resources for refugees and those involved in supporting them. Participants raised numerous concerns about the *Homes for Ukraine* scheme, seeing

risks of human trafficking and exploitation in the matching process, limited checks on hosts and the lack of longer-term oversight. They were worried both about deliberately predatory hosts and about conditions becoming increasingly and insidiously exploitative over time. Concerns around the *Ukraine Family Scheme* centred on the lack of additional funding for local authorities to support refugees coming to the UK under this scheme and how their accommodation needs would be met. Refugees being left homeless and/or destitute was seen as a clear risk factor for human trafficking and exploitation. Ukrainians in the UK on *Seasonal Workers Visas* were seen as *already* being in a precarious position in terms of risks of human trafficking and exploitation, which was then exacerbated by the war. New policy changes affecting this group were welcomed but concerns remained over delays and limited support. Routes to family reunification were seen as likely to remain difficult in practice for Ukrainians who are/have been working for low wages and living in cramped caravans on isolated farms, who will likely struggle to meet the accommodation requirements to sponsor their families through *Homes for Ukraine*. Ukrainians who are undocumented in the UK (for example, after having breached restrictive visa terms by leaving an exploitative workplace) were also identified as a particularly high-risk group for human trafficking and exploitation. They were seen to be in a hyper-precarious position, with limited access to rights and protections and falling through the gaps of the various Ukraine-specific schemes. Overall, there is a clear need for improved provisions for particularly precarious groups and careful consideration as to how to improve safeguards against risks of human trafficking and exploitation in the design, implementation and monitoring of these schemes.

3

Information gaps and information overloads may exacerbate risks of human trafficking and exploitation

Participants repeatedly stressed the need in the UK and internationally for clear, helpful, accessible information to support both refugees from Ukraine in particular, but also hosts, local authorities and businesses. As well as helping with transitions in general, such resources were seen as vital in increasing awareness of and resilience to the risks of human trafficking and exploitation. Existing UK government guidance for refugees from Ukraine was not seen to go far enough to address this need. There was clear evidence from across the UK of much goodwill and a genuine desire to provide help to those fleeing Ukraine. That was reflected in the many mentions throughout the event of various guides, pamphlets and initiatives from civil society and others, designed to assist refugees and those supporting them. Yet, important concerns were also raised that the sheer volume and diversity of such materials may inadvertently give rise to an unhelpful information overload, with resources becoming fragmented, decentralised and hard to find. A compelling case was made for the need to be more focused and selective in terms of information-sharing, scaling back and thinking more critically about what is trying to be achieved, who is best placed to help and how to make support pathways as simple and accessible as possible.

4 Insecurity, fear and the broader political climate around immigration and asylum create difficult conditions in which to respond

Participants described struggling to reconcile fundamental tensions between the UK's current – overwhelmingly supportive – response to Ukrainian refugees and its wider immigration and asylum policies. Particular concerns were raised about the ways in which immigration insecurity increases risks of human trafficking and exploitation and reduces access to justice. Tensions were evident between calls from police and labour enforcement to increase reporting of human trafficking and exploitation and concerns about barriers in practice, such as fear, mistrust, dismissive attitudes and the lack of a protective firewall to prevent sharing of personal data without consent between law enforcement and immigration enforcement when undocumented migrants report crimes. Implementing such a firewall was seen as vital in ensuring Ukrainians (and others) feel safe reporting human trafficking and exploitation. Participants also stressed the importance of alternative pathways to support for refugees outside of seeking help from the authorities.

5 Longer-term strategic planning is vital, but seems to be lacking to date

Participants agreed that there was a clear and pressing need for longer-term, more strategic planning around refugees from Ukraine, as well as effective crisis responses. Participants emphasised the need to prepare now for refugees in the UK potentially needing to stay longer and to be alert to the risks of compassion fatigue. Working towards clear plans for mitigating, managing and monitoring risk and facilitating early intervention were all seen as key. Participants warned against the dangers of relying on humanitarian agencies over state ones and of responses that isolate refugees, limit their independence and impede integration. Participants stressed the importance of effective integration both as an important goal in its own right and as a way of reducing risks of human trafficking and exploitation. Participants called for responses to be trauma-informed, communities to be mobilised, and Ukrainians to be actively involved in the planning and delivery of interventions, as well as migrant-led groups more generally.

Policy recommendations

There are 25 policy recommendations that follow from the evidence gathered at the roundtable. Many of these are immediate measures, others deal more with medium- to longer-term responses. These measures focus on ways of reducing risks of human trafficking and exploitation, increasing resilience and building capacity to respond.

Preventing people from falling through the gaps in current provisions and thus becoming especially vulnerable to human trafficking and exploitation

1. The Home Office should reconsider its requirement for visas for those seeking sanctuary in the UK from the war in Ukraine. Ukraine could be removed from the visa national list, meaning Ukrainians would be security-checked at the border.
2. The Home Office should provide clear and accessible information about the *Ukraine Extension Scheme* (which opens on 3 May 2022) to all Ukrainians in the UK on the Seasonal Worker Visa, and process their applications quickly.
3. The Home Office should make provisions for, and fund, measures to support Ukrainians already in the UK on Seasonal Worker Visas while they are waiting for applications to be processed and ensure they have support finding alternative work, accommodation and bringing their children and other family members to safety in the UK.
4. The Home Office should extend eligibility to the *Homes for Ukraine* and *Ukraine Extension Scheme* to all Ukrainians in the UK whose visas expired prior to 1 January 2022, as they currently fall through the gaps in provisions.
5. The Home Office should extend eligibility to *Homes for Ukraine* and the *Ukraine Extension Scheme* to Ukrainians who are in the UK but have no visa to renew (expired or otherwise), as they currently fall through the gaps in provisions.
6. The Home Office should improve access to support in the UK for non-Ukrainians also fleeing the war in Ukraine, expanding upon the existing (limited) provisions that only cover non-Ukrainian family members of Ukrainians applying under the various schemes.

Improving safeguarding and risk management for those believed to be at especially high risk of human trafficking and exploitation

7. Child Safeguarding Partnerships (England and Wales), Child Protection Committees (Scotland) and the Safeguarding Board for Northern Ireland should make clear strategic plans for how to identify and monitor risks to child refugees from Ukraine, paying particular attention to the risks around those who are or become separated or unaccompanied. The Government in the UK and devolved nations should provide adequate support to devise, implement and monitor activity in this area.
8. Safeguarding Adults Boards in the UK's four nations should put in place similar strategic plans to identify and monitor risks to adult refugees from Ukraine with particular vulnerabilities and/or complex needs. Such plans should ensure that both immediate and emergent safeguarding needs are identified and met. The Government in the UK and devolved nations should provide adequate support to devise, implement and monitor activity in this area.

Thinking more strategically in terms of using information and guidance to address risks of and responses to human trafficking and exploitation

9. The Home Office should revise its existing guidance for Ukrainians entering the UK to ensure the official guide adequately addresses key questions around human trafficking and exploitation. That might take the form of a separate guide, or revisions to the existing one. Here, multi-lingual provisions are essential, as is, clear and informative signposting to further resources as needed.
10. The Home Office, other statutory agencies, NGOs and others, working on awareness-raising initiatives around human trafficking and exploitation should seek to be focused, judicious and selective in terms of information-sharing, scaling back and thinking critically about what is trying to be achieved, who can best help and how to make the pathways to support much smoother in practice, as well as how to monitor and learn from the impacts of interventions.
11. The Home Office should issue clear guidance to the public, local authorities and specialist services about its response to separated and unaccompanied minors from Ukraine and publish regular data on the number of arrivals in this category and steps taken to mitigate and monitor risks. More transparency in data around both visas and arrivals is needed in general, but particularly for this group as they are considered especially vulnerable to human trafficking and exploitation. To be clear, simply refusing visas to children is not safeguarding them.
12. The Department for Levelling Up, Housing and Communities (DLUHC) and the Home Office should issue clear guidance to local authorities explaining their responsibilities around running checks on hosting placements under *Homes for Ukraine*, both in the immediate and longer term, and work with local authorities to support them in meeting these responsibilities.
13. The DLUHC should provide clear guidance for people hosting refugees from Ukraine under the *Homes for Ukraine* scheme, which might include direct signposting on the scheme website to existing guidance for prospective hosts (e.g., the NACCOM good practice guide). Information should also be provided centrally to set and clarify expectations around domestic chores, identified in the roundtable as a high-risk area for domestic servitude.
14. The Home Office should work with business organisations, such as the Chamber of Commerce, to develop and disseminate clear guidance for businesses already employing refugees from Ukraine and/or wishing to employ them, to help clarify expectations, share good practice and mitigate risks of exploitation at work.

Building resilience and reducing risk to human trafficking and exploitation through access to vital rights, services and support

15. The Home Office (working with other relevant Government departments as necessary), Northern Ireland Executive, Scottish Government and Welsh Government should put in place clear plans and funding to support refugees from Ukraine in accessing immigration advice, support around their labour rights and other relevant support with integration into the UK, such as ESOL lessons (English for Speakers of Other Languages). Here, the Scottish example of centralised funding for such services may be a useful example to explore. Grassroots, migrant-led services should be considered for funding, not just national services.
16. The Department of Health and Social Care, Department of Health (Northern Ireland) and Health and Social Care (Scotland) should formulate clear plans for how to meet the immediate and longer-term physical and mental health needs of refugees from Ukraine. In the absence of increased central funding for NHS mental health services, ringfenced provisions specific to supporting refugees from Ukraine would likely be helpful.
17. The DLUHC should work with local authorities to make clear plans for how to support refugees from Ukraine with their housing needs. Here, it is important to consider those coming under the *Ukraine Family Scheme* who have no suitable accommodation on arrival, those whose are transferring from the

Seasonal Worker Visa and those who become homeless after *Homes for Ukraine* hosting placements break down. These plans should be resourced appropriately and centrally.

18. The Home Office should implement a minimum of £10,500 funding to local authorities for each refugee in their area under the *Ukraine Family Scheme* and the *Ukraine Extension Scheme*, in line with provisions under *Homes for Ukraine*.
19. The Home Office should extend the £200 per person individual payment to all those coming to the UK through the *Ukraine Family Scheme* and Ukrainians already stranded in the UK (e.g., those on a current or expired *Seasonal Worker Visa*), in line with provisions under *Homes for Ukraine*. Additional payments beyond the first payment should be considered for those waiting for essential state benefits.

Addressing systemic issues that produce and exacerbate risks of human trafficking and exploitation

20. The Home Office should implement a protective firewall between law enforcement (police and labour inspectorates) and immigration enforcement, to prevent the sharing of personal data when Ukrainians (and other migrants) with irregular status, report crimes as victims or witnesses. This measure is vital in ensuring people can safely report human trafficking and exploitation without fear of deportation.
21. The Home Office should reconsider its broader policies around asylum and immigration, seeking to improve support to refugees, asylum-seekers and other migrants rather than pursue ever more punitive measures. For example, the Home Office should take urgent measures to improve the current asylum system, reducing long waiting times and giving all asylum seekers the right to work while their claims are being processed. It should also repeal the 'illegal working' offence.
22. The Home Office should improve oversight of the *Seasonal Worker Visa* scheme, including through regular and proactive labour inspections. It should provide targeted support and access to justice for those subject to abuses under the scheme as well as seek to reduce exploitation through the provision of information and access to practical options, such as the ability to transfer between farms quickly. The Home Office should also, in consultation with outside experts, consider ways of revising this scheme to reduce its inherent risks of exploitation.
23. The Home Office should start consulting on and planning for what happens when the current Ukraine schemes end after three years and provide security to refugees from Ukraine in the UK in the form of a route to settlement. If people are unable to stay regularly, they may become vulnerable to human trafficking and exploitation.

Other steps towards a more strategic, long-term response to addressing risks of human trafficking and exploitation in conflict situations

24. The Home Office should establish a UK-wide multi-agency working group to monitor and collect evidence on both risks and documented cases of human trafficking and exploitation in relation to the war in Ukraine, ensuring relevant data (including but not limited to data from National Referral Mechanism and Duty to Notify systems) are collected and made available to inform strategic planning.
25. In consultation with other Government departments, statutory agencies and civil society (e.g., NGOs, lawyers, academics etc), the Home Office should develop clear plans for future responses to risks of human trafficking and exploitation in war and mass displacement, seeking to understand and learn from both good practice and shortcomings in responses to the war in Ukraine and beyond (e.g., Afghanistan, Syria, Libya).

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Introduction

On 24 February 2022 the Russian Federation launched a full-scale invasion of Ukraine. That marked a major escalation in the conflict that has been ongoing in Ukraine's Donbas region since Russia's illegal annexation of Crimea in 2014. Of Ukraine's population of 44 million, many millions of people have been displaced both within the country and beyond its borders. Faced with what is one of the fastest growing refugee situations in recent history and one of the greatest threats to European security since World War Two, countries across Europe and beyond have taken decisive action to support people fleeing this conflict. In addition to foreign policy responses, such as coordinated international sanctions on Russia, military support and humanitarian aid to Ukraine, both state and non-state actors are increasingly turning their minds to **how to prevent this clear humanitarian crisis from turning into a human trafficking crisis**.

In response to these concerns and the pressing need for evidence to inform policy and practice, UCL and the Office of the Independent Anti-Slavery Commissioner (IASC) convened an international, multi-agency roundtable on 7 April 2022. The roundtable focused on risks of human trafficking and exploitation arising from the war in Ukraine. **Over one hundred specialists** participated in the roundtable, including **representatives from civil society, national and transnational governmental organisations, law enforcement, labour market enforcement, healthcare, academia and industry**. A full list of named speakers and participating organisations can be found in the Annex. All participants and others who were invited but unable to attend were encouraged to submit any additional points by email by 14 April, which we then also considered in the analysis for this report. The online roundtable lasted two hours and included short talks from nine key speakers and focused discussions among participants in breakout rooms and plenary situations. The roundtable had a particular focus on the UK context, situated within lessons and concerns from the broader international landscape. The event was funded by the UK's Economic and Social Research Council, as part of UCL's ongoing research programme on human trafficking (grant ref: ES/S008624/1).

The aim of the roundtable was to gather and synthesise evidence from a wide range of stakeholders in order to generate rapid evidence on a vital issue and make a series of targeted policy recommendations (see page 6). Invited speakers and participants were encouraged to focus their contributions on four main areas: (1) emergent issues already being encountered; (2) particular risks they saw and concerns they had; (3) recommendations for responses; and (4) any words of caution for responses. The latter point is important to include, since there is a history of anti-trafficking interventions lacking clear, well-thought through mechanisms for change, transparency and/or accountability¹. As such, even well-intended interventions can run the risk of being ineffective and/or actively harming already marginalised groups, such as people who have been trafficked, irregular migrants and sex workers.

For context, human trafficking involves the movement of people from, within, between and to countries for a wide range of different purposes, such as sexual exploitation, domestic servitude or exploitation in other labour contexts. Human trafficking is defined in international law under the United Nations' 'Palermo Protocol' of 2000², which informs and underpins numerous national responses, including the UK's³. While human trafficking and so-called 'modern slavery' are often talked about as if they were neatly delineated

¹ See, e.g., Cockbain, E. (2020) [From Conflict to Common Ground: Why anti-trafficking can be compatible with challenging the systemic drivers of everyday abuses](#), *Anti-Trafficking Review*.

² UN (2000) [Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children](#).

³ Human trafficking and severe exploitation (slavery, servitude and forced or compulsory labour) are criminalised in the UK under the Modern Slavery Act 2015 (England and Wales), Human Trafficking and Exploitation (Scotland) Act 2015 and Human Trafficking and Exploitation (Criminal Justice and Support For Victims) Act (Northern Ireland) 2015.

and easily countable issues, their boundaries are actually fuzzy and there is considerable confusion and inconsistency around how these concepts are understood and operationalised⁴. The criminal justice frame through which these issues are overwhelmingly approached has been criticised for a tendency to exceptionalise human trafficking and individualise risk through the false dichotomy of ‘evil’ traffickers and their ‘powerless’ victims⁵. In fact, individualised risk factors can and do interact with broader social, economic and political systems to produce, exacerbate and sustain exploitative situations and impede effective responses⁶. Consequently, many experts emphasise the need for a nuanced conception of and response to human trafficking and ‘modern slavery’, one that recognises that these issues are an extreme part of a broader ‘continuum of exploitation’⁷. Moreover, risk is dynamic, and people can move in and out of situations in which the severity and harm of exploitation varies⁸. More routinised, lower-level abuses have received far less research attention to date, but failure to address them can lead to the normalisation and entrenchment of exploitation and even its escalation⁹. **Against this context, we deliberately framed the roundtable around ‘human trafficking and exploitation’ rather than ‘modern slavery’, in the hope of encouraging a more inclusive approach and not restricting the focus to only the most extreme forms of abuse¹⁰.**

The situation with the war in Ukraine, mass displacement and risks of human trafficking and exploitation is rapidly evolving, meaning that a faster pace of evidence-gathering than normal was needed to inform policy and avert harms. A core strength of our approach is that we were able to convene a large number of international and UK-based experts from different backgrounds, gather credible information on what they are seeing in real-time, listen to their key concerns and recommendation based on years of relevant professional experience, and analyse and synthesise this evidence to present timely policy recommendations on this urgent topic. Despite doing all that at speed, we have maintained a rigorous and transparent approach throughout. Drawing on our research experience and specialist domain knowledge, we were also able to tie this new evidence back to the broader academic and policy evidence-base¹¹. We are deeply grateful to all those shared who their knowledge, networks and time to make this endeavour possible, and the Independent Anti-Slavery Commissioner and the UK’s Economic and Social Research Council who both immediately recognised the value in this approach.

In this report, we present the key issues raised at the evidence-gathering roundtable, situating them within the broader evidence base and identifying clear policy recommendations for efforts to prevent and respond to human trafficking and exploitation in relation to the war in Ukraine (pages 6-8). We identified **five main themes** in the roundtable discussions, namely that participants were concerned that: (1) **conflict drives human trafficking and exploitation**; (2) **the UK’s visa-based responses to refugees from Ukraine contain risks in terms of human trafficking and exploitation, and need more clarity, resourcing and**

⁴ See, e.g., O’Connell Davidson, J. (2015) [Modern Slavery: The Margins of Freedom](#).

⁵ See, e.g., Wilson, M. & O’Brien, E. (2016) [Constructing the ideal victim in the United States of America’s annual trafficking in persons reports](#), *Crime, Law and Social Change*.

⁶ See, e.g., McGrath, S. & Watson, S. (2018) [Anti-slavery as development: A global politics of rescue](#), *Geoforum*; Kenway, E. (2021) [The Truth about Modern Slavery](#)..

⁷ Skrivankova, K. (2010) [Between decent work and forced labour: Examining the continuum of exploitation](#).

⁸ See, e.g., De Vries, I. & Cockbain, E. (forthcoming) Governing through Indicators: Structural Biases and Empirical Challenges in Indicator-Based Approaches to Anti-Trafficking Policy, Practice, and Research, In: E. Faulkner (ed.) *Modern Slavery in the Global Context* (copy of chapter available on request)

⁹ See, e.g., Scott, S. (2017) [Labour exploitation and work-based harm](#); Davies (2018) [From severe to routine labour exploitation: the case of migrant workers in the UK food industry](#), *Criminology & Criminal Justice*.

¹⁰ We appreciate that the term exploitation is still slippery in itself.

¹¹ While a comprehensive review of the literature was beyond the scope of this project, the first author has over twelve years’ experience conducting research around human trafficking, labour exploitation and child sexual exploitation that provided valuable domain knowledge and familiarity with relevant materials on which to draw. We also benefitted from participants’ generosity in flagging additional materials of specific relevance to this report.

accountability; (3) information gaps and information overload may exacerbate risks of human trafficking and exploitation; (4) insecurity, fear and the broader political climate around immigration and asylum create difficult conditions in which to respond; and (5) longer-term strategic planning is vital but seems to be lacking to date. In the next section of the report, we discuss each theme in turn, and include quotes from the event to illustrate points, promote transparency and provide nuance. There is a certain degree of overlap between thematic findings, as some crosscutting points (*e.g.*, around integration) applied to multiple themes. Overall, this report seeks to capture the views and contributions of a wide and varied range of experts from across relevant sectors and specialisms. Many had direct experience responding to the current crisis in Ukraine, while others had valuable related expertise across topics such as migration, conflict, human trafficking, various forms of exploitation, labour rights, child protection and public health.

The report is based on an analysis of the verbatim transcriptions of the event's recordings, which were made with consent. Only those quotes that come from invited speakers in their talks are attributed to them by name, to which they gave informed consent. In all other cases, in keeping with the Chatham House Rule, quotes are anonymised and we provide only an indication of the speaker's professional affiliation. In taking this approach, we hoped that the protection of anonymity and confidentiality would encourage participants to speak openly and honestly about sensitive topics, as many ultimately did. In this report we have tried to represent the discussions at the roundtable faithfully and with nuance, highlighting where opinions diverged as well as converged. While we cannot claim to represent the views of *all* participants nor the organisations they represent, we have made every effort to give a faithful and nuanced account.

Finally, it is important to emphasise that although this report addresses risks of human trafficking and exploitation in relation to the war in Ukraine, these issues are but part of a much broader picture of harm. Russia's war has brought mass destruction, displacement, destabilisation and widespread atrocities, with reports of systematic rape, torture, murder and abductions of Ukrainian civilians by Russian forces. Numerous lives have been ruined and lost: according to the latest figures from the United Nations (UN), 5,718 civilian casualties have been confirmed in the first two months of the war alone, including 2,655 people killed¹². The Office for the UN High Commissioner for Human Rights stresses that the true figures are likely 'considerably higher', because many reports are still pending corroboration and information has been delayed from areas where the hostilities are particularly intense. On 2 March 2022, the International Criminal Court (ICC) confirmed it had launched an investigation into Russian war crimes, and since then horrendous accounts continue to emerge from places such as Bucha, Mariupol, Irpin and beyond. In the UK, the Metropolitan Police Service is supporting the ICC investigation and has appealed for reports from refugees fleeing Ukraine and others with direct evidence of war crimes in Ukraine¹³. In focusing in on risks of human trafficking and exploitation, we are certainly not trying to detract from this bigger picture, but rather to do what we can to help avoid an already bleak situation becoming even bleaker for those seeking sanctuary from the war in Ukraine.

¹² OHCHR (2022). [Ukraine: civilian casualty update 25 April 2022](#).

¹³ For more information and a link to file a report online, see Metropolitan Police (2022) [UPDATE: Met receives dozens of referrals relating to alleged war crimes](#).

Key findings

1. Conflict drives human trafficking and exploitation

In terms of the general context of the war in Ukraine, participants raised four main areas of concern: (1) understanding how this war translates into risks of human trafficking and exploitation; (2) the nuances of risk and resilience; (3) the protective value of visa-free responses to Ukrainian refugees; and (4) forgotten refugees in this war.

1.1. Understanding how the war in Ukraine translates into risks of human trafficking and exploitation

There is already established evidence that conflict is a driver of human trafficking¹⁴. Likewise, there was clear consensus among roundtable participants that the war in Ukraine presents many real and significant risks for human trafficking and exploitation, both for people remaining in Ukraine and those forced to leave. Examples were provided of similar situations of human trafficking and exploitation which followed other major conflicts, most recently in Syria and Libya. Participants repeatedly called for an immediate and co-ordinated response at both national and international levels to prevent this humanitarian crisis turning into a human trafficking crisis.

'Millions of women, children and elders are escaping from the country. Without any preparation for travelling, more than four million Ukrainians are still looking for a safe place to stay, food and a job all of them in the high risk to be trafficked. It is a big time to be proactive and prevent a violation of human rights.'

– Elvira Mruchowska, Director of Ukrainian anti-trafficking NGO Suchasnyk Plus

Participants attributed the increased risks of human trafficking and exploitation to three key factors. First, the scale and speed at which people were fleeing Ukraine and their demographic composition. At the time of the roundtable, it was estimated that over ten million people had been displaced, six to seven million internally and four million outside Ukraine. An estimated 90% are women and children: groups long seen as particularly vulnerable to human trafficking, particularly for sexual exploitation¹⁵. Other and oftentimes intersecting factors that were highlighted by participants as further increasing vulnerability included being an unaccompanied or separated minor, being elderly, belonging to a minority ethnicity group (e.g., Ukraine has a large Roma population), having a disability, being LGBTQ+ and lacking access to safe routes and settlement (something particularly affecting non-Ukrainians fleeing the war)¹⁶. Concerns about risks of

¹⁴ E.g., UNODC (2018) [Trafficking in persons in the context of armed conflict](#); Modern Slavery and Human Rights Policy and Evidence Centre (2021) [Rapid analysis findings. Annex to Policy Brief: Modern Slavery and International Development](#); and Healy (2016) [How are the war in Syria and the refugee crisis affecting human trafficking?](#)

¹⁵ The historically dominant focus on trafficking for sexual exploitation is increasingly challenged. There is wider exploitation occurs across (and beyond) different labour contexts and that men too are vulnerable to trafficking. Nevertheless, there is also clear evidence of gendered distinctions in trafficking, with sexual exploitation particularly affecting women and girls. See, e.g., Cockbain, E. & Bowers, K. (2019) [Human trafficking for sex, labour and domestic servitude: how do key trafficking types compare and what are their predictors?](#) *Crime, Law and Social Change*.

¹⁶ See UNODC (2022) [Conflict in Ukraine: Key Evidence on Risks of Trafficking in Persons and Smuggling of Migrants](#).

trafficking and exploitation were reflected in the emerging accounts provided by roundtable participants, involving people still in Ukraine, arriving in border countries, *en route* to other destinations and in the UK. Illustrative examples include:

‘We already know that Ukrainian women and girls ...are approached at the railway stations, at the reception facilities, by males offering them money in exchange for sex or just offering them an overnight stay which ultimately might result in raping.’

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

‘I’m hearing from police officers of Ukrainian females who have arrived in the UK kind of literally as things were turning bad... I’m hearing from the police who are going into the brothels that they are very concerned that there’s an increase in the number of Ukrainian females... I suspect that those females are compelled into sex work rather than being more consensual sex workers, and I’m concerned about the lack of our ability from a policing and disruption and safeguarding perspective to intervene and protect’.

– Barrister

For men and boys remaining in Ukraine, *‘exploitation in the armed conflict itself’* was flagged as a major concern (Dr Claire Healy). Another participant emphasised the importance of considering the impact of the war on known human trafficking routes through Ukraine.

‘Ukraine is an important transit country for trafficking from Vietnam and China... so it would be important to understand and think about the impacts of conflict on those existing routes and how traffickers are going to change patterns and movements in that context.’

– Transnational organisation

Second, participants highlighted that the mass displacement of people is taking place against a backdrop of a breakdown of law and order, major disruption to critical systems, infrastructure and support networks, a lack of basic resources and, critically, a general uncertainty among those fleeing Ukraine about what to do, where to go and who to trust. Participants agreed that in such situations, opportunities for exploitation are both created and amplified. One participant, for example, described an anecdotal account from the Ukrainian border, in which suspected organised criminals were trying to pass themselves off as aid workers to recruit and exploit fleeing refugees. A recurring theme from the discussions was that people in danger and struggling to meet basic needs are inevitably compelled into heavily constrained decision-making processes. The conflict in Ukraine forces refugees, many of whom have been exposed to significant trauma, to make unthinkable choices under unthinkable conditions, leaving many vulnerable to exploitation.

'[Refugees are] trying to make decisions whilst in survival mode... making decisions when you are deeply fatigued physically and psychologically, profound sadness and grief, where you've got urgent and unmet bodily needs in yourself and if you were a parent, it can be even worse seeing that in your child or in your elderly parent you're trying to support.'

– Dr Laura Wood, doctor and researcher at the Helen Bamber Foundation and VITA

'...conflict, it leads itself to a lack for legitimate choice so often it's a choice of lesser evils, and into that whole mix as well is a breakdown in support networks that increase vulnerability, and then the kicker is there's no way to accurately identify who is and isn't legitimate when you're having to make those choices.'

– NGO

Third, and focusing specifically on the risks of trafficking and exploitation in the UK, participants drew attention to how the *new* risks specific to the Ukrainian conflict were interacting with *existing* systemic risks in the UK, many of which are discussed in more detail shortly. As participants put it:

'...much of we're seeing with Ukrainian nationals being exploited is an exacerbation of risks that already existed in many sectors and the need for increased labour market enforcement, resourcing, increased powers to address exploitation.'

– NGO

'So, whilst the large numbers of people coming from Ukraine may increase the number exposed to trafficking or forced labour or both, the underlying situation... It's almost a perfect storm of conditions which mean that this is very much likely to happen'

– Academic

Despite the abovementioned concerns, and emerging accounts of disappearances, sexual violence and suspected human trafficking and exploitation (on top of the atrocities inflicted on Ukrainians by Russian forces), participants also agreed that there is little reliable data on the nature and extent of human trafficking and exploitation as a result of the war in Ukraine¹⁷. For example, while some participants raised

¹⁷ There are longstanding and well-recognised barriers to getting a reliable picture of the scale and nature of trafficking and exploitation, even without the considerable complicating factors of war and mass displacement. See, e.g., Cockbain, E *et al.* (2020) [Using Law Enforcement Data in Trafficking Research](#). In J. Winterdyk and J. Jones (eds.) *The Palgrave International Handbook of Human Trafficking*.

concerns about substantial increases in online searches related to Ukrainian escorts and Ukrainian pornography, these were not presented as evidence of human trafficking *per se*¹⁸.

Overall, there was a clear and shared sense among roundtable participants of the need to monitor and collect evidence on both the risks and documented cases of human trafficking and exploitation in relation to the war in Ukraine¹⁹.

1.2. The importance of taking a nuanced, proportionate view on risk, resilience and reactions

When considering human trafficking and exploitation, roundtable participants both asserted and agreed that the discourse around the risks (and responses) to refugees from Ukraine needed to be nuanced and inclusive. More specifically, importance was attached to how the evident risks of sexual violence and exploitation, both in transit to and on arrival in the UK, needed to be considered alongside other broader risks of exploitation across diverse labour contexts such as domestic servitude, agriculture and so on.

'It was very welcome that labour exploitation is being looked at by the speakers and by others now because sex exploitation, which is a huge and important issue, was being emphasised at the expense of all the other forms of exploitation.'

– NGO

Going further, and particularly in light of the media's tendency to focus on trafficking for sexual exploitation at the expense of other forms of exploitation, some participants expressed concerns that interventions may be deployed in a way that further disadvantages already marginalised groups. Similar concerns were flagged by members of sex worker-led organisations in discussions ahead of the roundtable.

'My concern here is that this potential exploitation in the sex industry can be used once more to legitimise anti-sex work and anti-migration initiatives and that it might end up in deportation rather than assistance... And I think this goes, you know, far beyond the specificity of the sex industry because if we want to build trust and if we want to make sure that we reduce this vulnerability then the priorities and needs of people need to come first...let's make sure that whatever help is there is not counterproductive for migrants.'

– Academic

¹⁸ Importantly, it is notoriously difficult to disentangle potential human trafficking from broader online data on sexual services. See, e.g., Kjellgren, R. (2022) [Good Tech, Bad Tech: Policing Sex Trafficking with Big Data](#), *International Journal for Crime, Justice and Social Democracy*.

¹⁹ From the perspective of international/transnational monitoring, the situation becomes even more complex, challenging and concerning given reported mass deportations of Ukrainians to Russia. See, e.g., Blitz, B. & Lewis, A. (2022) [Putin's Gulag-Based Empire of Abduction, Deportation and Modern Slavery](#), *Byline Times*.

In a similar vein, while children (especially separated and unaccompanied minors) were widely seen as being at greater risk of human trafficking and exploitation, the need for careful, proportionate, individualised responses was also flagged here. Again, there seems to be a clear need to balance anti-trafficking imperatives with an awareness of other potentially competing risks and harms. Examples include the harms of protracted separation of parent-child units in a time of crisis (e.g., if a child is struggling to get travel permission to join a parent already in the UK) or whole families being blocked from onward travel because one family member's visa has been held up (as has been reported in the UK press since the roundtable²⁰).

'And there will be some cases where there is good parental consent and there's no trafficking concern where hopefully an individualised decision will still be made, whatever the main rules say.'

– Jennifer Blair, Barrister and Co-Founder of the Ukraine Advice Project

In emphasising the importance of thinking about risk in a nuanced way, participants also discussed various sources of resilience to human trafficking and exploitation. That means understanding that there is variation in risk between places within Ukraine as well as beyond it, that refugees from Ukraine are themselves far from homogenous and that risk itself is dynamic, as illustrated in the following quotes:

'...migrants and refugees from Ukraine are not a homogenous category...and while we speak about vulnerabilities and who is most vulnerable to human trafficking it is also important to look at the success stories... this is in fact very important to see what makes this crucial difference in ensuring that people who flee their homes are safe, are protected, are integrated.'

– Dr Anastasia Riabchuk, National University of Kyiv-Mohyla Academy

'Often...we talk about risk as quite static listed attributes that a person holds and in a crisis setting things move quite quickly and can be quite dynamic for people, and so how do we make sure our response is kind of as agile and quick to respond to these changing risk factors that refugees are navigating?'

– Academic

Dr Riabchuk, a Ukrainian academic with direct personal and professional experience of navigating war and displacement in Ukraine, also stressed the importance of ensuring that people fleeing have safe spaces both within and beyond Ukraine to pause, regroup and make an onward plan, both for their general wellbeing and to mitigate risks of exploitation:

²⁰ Townsend, M. (2022) [Homes for Ukraine whistleblower says UK refugee scheme is 'designed to fail'](#). The Guardian.

'...one thing that really makes a big difference, is having a plan. Of course, it's very difficult to plan an escape from war, especially if your home is destroyed, if you're in danger, so it's not a very good environment to be thinking about something or planning... So, it's very important to have this space to take a break and where people feel that they don't have to rush and take these decisions really quickly because if they don't, they're dead, right? So just making sure there are these safe spaces along the way.'

– Dr Anastasia Riabchuk, National University of Kyiv-Mohyla Academy

She and other participants also stressed the protective value of ensuring refugees can make use of necessary 'social infrastructure for integration', for example via ready access to the labour market, the benefits system, education and healthcare. As an illustrative case, she stressed how enabling displaced people easily and quickly to enrol their children into school has the important dual benefit of offering children much-needed routine and stability and freeing up time for adults to deal with other pressing issues. Given the prevailing demographics of the refugee populations from Ukraine, the particular importance of destination countries supporting family units to integrate was also stressed. The subject of refugee integration is discussed further on pages 41-43. Finally, numerous participants understandably highlighted trauma as a key issue to consider in responding to refugees from Ukraine and emphasised the need for trauma-informed provisions in the UK. At the same time, there was caution against exceptionalising standard human reactions to horrendous experiences:

It's really important for us not to over-medicalise and over-pathologise how people are responding very appropriately to pain, to danger, to grief, to uncertainty. It can be really unhelpful when we're trying to build and encourage resilience to make populations feel that they are broken and in need of fixing, to hold people in a sense of feeling that they're damaged or disordered or weak or helpless, or that their only hope is at some point in the future having one to one psychological therapy. That doesn't help build resilience and protection against any form of abuse, recovering from trauma and moving forward as individuals or family units.'

– Dr Laura Wood, doctor and researcher at the Helen Bamber Foundation and VITA

1.3. The protective value of visa-free responses to refugees

The consensus voiced at the roundtable was that many other European countries' decision to grant visa-free access to Ukrainians is a major source of resilience against human trafficking and exploitation, for two main reasons²¹. First, it enables Ukrainians fleeing the conflict to access work, healthcare, education etc as rapidly and easily as possible, which is not only overall beneficial for refugees but also functions as a protective factor for risks of human trafficking and exploitation more specifically (as mentioned previously).

²¹ The European Union (EU) activated the Temporary Protection Directive in early March, described as 'a directive that was in place for exactly this kind of situation, for arrivals of large numbers of people seeking protection where we knew in advance that the asylum system would break down if everybody had to apply' (Dr Healy, UNODC).

Second, a visa-free policy reduces refugees' needs to travel by irregular routes (e.g., using smugglers), which can itself increase exposure to risks of exploitation. Dr Claire Healy of the UNODC put it like this:

'We know that people being able to travel regularly, legally and cheaply without ever having to use a smuggler is in itself a source of resilience to trafficking. That's excellent, that's something that, you know, we've advocated for a long time, and we can only hope that we learn from this experience that it is possible and that we expand this possibility to more people who are fleeing conflict and persecution... if people can get status immediately, they travel legally, they get legal status as quickly as possible and therefore the adults, the women can access the labour market, people who are not in a position to work can access important support and children can access education, healthcare and so on. So, these are all key factors of resilience.'

– Dr Claire Healy, United Nations Office on Drugs and Crime (UNODC)

1.4. Forgotten refugees in this war

Although the EU's response to Ukrainian refugees was widely praised, several participants also stressed that the EU's visa-free approach is exclusionary: non-Ukrainians²² fleeing the same war are denied equivalent rights and protections. Concerns were raised around the fundamental inequity in this segregation as well as the implications for heightened risks of human trafficking and exploitation. One group highlighted as being particularly vulnerable to exploitation was overseas students (many of whom come to Ukrainian universities to study medicine and related topics²³), for the reasons outlined below:

'So, Ukraine has hosted students for many years, particularly from across Africa, Asia, the Middle East, over 76,000 young people studying in Ukrainian universities. With the onset of conflict many have managed to get home, many have not. So, they're very young, they've faced a lot of racism, discrimination, segregation within refugee responses, they're very isolated, they can't speak the languages, they're desperate to complete university courses. Some of these students are just months away from becoming a doctor or a social worker or a nurse. The universities are in crisis, they will not provide transcripts, any proof that student has ever studied. The student has got nothing paperwork-wise to go to any other university to say, "Please help me complete my degree." So, we have students in desperation feeling lost, unable to complete their professional training which was of course their dream, their career, their funding, perhaps their way to support their parents and so on. So, I think they are at considerable risk of being manipulated and exploited.'

– Dr Laura Wood, doctor and researcher at the Helen Bamber Foundation and VITA

²² There were an estimated 470,000 non-Ukrainians resident in Ukraine at the start of 2022. See UNOCHA (2022) [Ukraine: Humanitarian Impact Situation Report](#)

²³ For more information, see, e.g., Erudera (2022) [Ukraine International Student Statistics](#)

Similarly, several participants emphasised how the EU and UK were responding very differently to Ukrainian refugees than they had to refugees from other major conflicts. In addition to regular migratory routes having been very limited for other refugee groups, Dr Idrees Ahmad flagged how EU countries had actively prosecuted ‘people who were trying to help refugees using human trafficking law, so entirely blurring the distinction between predators and those who were trying to assist people who were vulnerable’. To this point, recent reports from Poland indicate that such punitive measures persist even as the Ukraine crisis unfolds, with the Polish authorities criminalising attempts to help (mostly Middle Eastern) refugees stranded on the Polish-Belarussian border, even as they embrace volunteer support on the Polish-Ukrainian border²⁴.

2. The UK’s visa-based responses to refugees from Ukraine contain risks in terms of human trafficking and exploitation, and need more clarity, resourcing and accountability

The UK’s domestic response to the Ukraine crisis was a central topic of the roundtable discussion and the subject of major concerns from participants. These concerns related to five key areas: (1) the ways in which the UK’s requirement for visas is seen to heighten risks; (2) a general view that the current UK response needs more transparency, clarity, accountability and resourcing; and specific concerns around particular visa schemes, namely (3) *Homes for Ukraine*, (4) *Ukraine Family Scheme* and (5) the *Seasonal Worker Visa*, a pre-existing short-term work visa that interacts with the new *Ukraine Extension Scheme*.

2.1. The ways in which the UK’s requirement for visas is seen to heighten risks

In response to mass displacement from Ukraine, the UK Government introduced several Ukraine-specific visa schemes: the *Ukraine Family Scheme* (allowing for reunification with a family member in the UK); *Homes for Ukraine* (the *Ukraine Sponsorship Scheme*, under which members of the public host refugees in their home); and, from 3 May 2022, the *Ukraine Extension Scheme* (for certain Ukrainians who are already in the UK on visas unrelated to *Homes for Ukraine* and the *Ukraine Family Scheme*). All three schemes are subject to various eligibility constraints and the system is complex and rapidly evolving. The information provided here is, to our best knowledge, correct at the time of writing this report.

Several participants questioned the rationale behind the UK’s approach whereby all Ukrainians seeking sanctuary from the conflict require visas. As one participant reflected:

‘...what binds together many of the issues being discussed is the government’s decision to treat this as a problem of immigration control rather than a humanitarian crisis – a decision to prioritise the (perceived) interests of the UK in controlling who comes here over the interests of the people most affected....’

– Barrister

²⁴ E.g., Fallon, K. (2022) [Smugglers or saviours? Poland’s divided stance on aiding refugees](#). The Guardian.

Relatedly, a stark divide between the UK's foreign and domestic policy responses to Ukraine was highlighted:

'In terms of foreign policy, the aid to Ukraine and especially the military aid has been pretty strong, but domestic policy has dragged its feet because it's responding to very different constituencies and concerns - well, the same constituencies probably that enabled Brexit.'

– Dr Idrees Ahmad, University of Stirling

The UK's approach to Ukrainian refugees was generally characterised by participants as slower, more restrictive and more unwieldy than the EU's open borders policy (discussed above). Going further, several participants suggested that the visa requirement exacerbates exploitation risks among those fleeing the war, both because of the confusion and long waiting times associated with visa processing and because its very existence has funnelled people into more dangerous situations and routes, as illustrated in the two quotes below:

'...it's [i.e., the UK's requirement for visas] meant that people have been waiting in third countries or in dangerous situations in Ukraine for these visa decisions to be made. I've spoken to people who've been sleeping in their cars, who've travelled through four different countries because they've been sent from one visa application centre to another. Initially people didn't realise the UK hadn't opened its borders, so they'd go and literally try and board a Eurostar, having driven from Ukraine, Poland, etc, and then exhaustedly be turned away and not know what to do and be given conflicting advice from French and British immigration officers in France. So, we've seen people who are running out of money while they're waiting for a visa application - it can take weeks for a UK visa application to be granted in Ukrainian cases at the moment - and the people are seeking help locally, but they are at risk of being preyed upon by unscrupulous people in that situation or falling into other abusive situations, so sexually abusive situations.'

– Jennifer Blair, Barrister and Co-Founder of the Ukraine Advice Project

'...our main concern is around the fact that that's [i.e., the visas] a barrier to accessing safety and we're already responding to incidents where people have had to take alternative routes and have been subject to exploitation and abuse because of that.'

– NGO

Crossings between the Republic of Ireland (ROI) and Northern Ireland were specifically flagged by participants as a source of concern. The Common Travel Area in Ireland is a point at which the EU's visa-free and the UK's visa-requiring systems come into direct contact, with no routine passport controls and an estimated 110 million person crossings a year²⁵. Participants stressed that Ukrainians entering the UK here (particularly if they then move on to the island of Great Britain) risk becoming undocumented, thereby disappearing off the radar and, consequently, losing access to vital social infrastructure, all of which were widely seen to increase risks of human trafficking and exploitation. Several participants reported that they had already heard anecdotal accounts of Ukrainians being trafficked into the UK through this route, including minors.

Against this backdrop of general discontent among participants with the UK's requirement for visas, and informed by recent conversations with her European anti-trafficking counterparts around the Ukraine crisis, the Independent Anti-Slavery Commissioner Dame Sara Thornton made the self-admittedly controversial argument that there was perhaps at least an opportunity here for monitoring and early intervention that the UK should try to maximise:

'Most countries in Europe have no visas and dispersed refugees and so from their perspective that makes it very difficult to provide support and to monitor the situation. So at least we have that advantage and I think it's very important that we don't squander that advantage because we have a better chance of protecting people over the medium to long term.'

– Dame Sara Thornton, Independent Anti-Slavery Commissioner

More generally, one participant questioned the decision to create new systems in response to the war in Ukraine – namely the Ukraine-specific visa schemes – rather than utilising existing systems, citing major problems with similar efforts in response to other conflicts and mass displacement.

'We seem to be going down a particular road of creating new systems that are parallel or in addition to the generalised systems. Now, I think that's potentially adding to the risk of harm and exploitation. I think that's the evidence we need to try and collect because it does feel like there's a repetition of mistakes that were made during the Syrian refugee crisis where, again, there was a parallel system created. And that's where I think the evidence collection could be most powerful to try and sort of influence policymakers to stop making those same mistakes.'

– Academic

²⁵ See HM Government (2017) [Additional Data Paper: Common Travel Area Data and Statistics](#).

2.2. A general view that the current UK response needs more clarity, transparency, accountability and resourcing

Participants commonly shared a sense of frustration with how the UK government was responding to Ukrainians²⁶ seeking sanctuary in the UK, describing the overall UK response as fragmented and confusing. More specifically, concerns were flagged about potential risks to unaccompanied and/or trafficked children from Ukraine, pointing to a well-documented history in the UK of these groups going missing at high rates from local authority care²⁷, as well as other particularly marginalised groups.

'...the lack of due diligence and the fast-track of certain schemes and processes have just opened up what seems to be a free market for exploitative situations.'

– NGO

'...there's been very little planning, and really no planning on the UK side, about how to meet the needs of more vulnerable populations.'

– Barrister

Concerns centred on the lack of funding, information and support for local authorities, onto whom much of the responsibility for supporting Ukrainians will fall. There was also a strong sense that the current UK response left major gaps around information, resources and support both for Ukrainians in the UK and those involved with them via housing, work, healthcare, education and other social support. Participants commonly expressed concerns that local authorities were being under-resourced and under-supported to cope with new arrivals, many of whom may have quite complex needs. For example, a police participant reported having been in a meeting with one London borough who had 30 Ukrainian children arriving into the borough's schools in one week alone in April, with numbers set to increase as more visas are granted. Fears were raised that the NHS would not be able to meet refugees' health needs (especially in terms of mental health services), given its already overstretched state.

'An overriding theme was how chaotic the response has been in the UK and how hard to understand it has been and that in itself creating risks.'

– NGO

²⁶ Please note that the main visa schemes are all geared towards Ukrainian nationals, whereby non-Ukrainians also fleeing the war in Ukraine are only eligible under very specific circumstances (when accompanying immediate family members who are Ukrainian nationals and meeting the scheme-specific requirements around residence in Ukraine.

²⁷ ECPAT UK & Missing People (2016) [Heading back to harm: A study on trafficked and unaccompanied children going missing from care in the UK](#).

'Everything that was being said by the keynote speakers terrifies me because I can just see all the indicators for [human trafficking] recruitment happening. And I don't think anyone in the Home Office is willingly doing this, but they are turning a blind eye to obvious flags and there needs to be a wholesale immediate root and branch education of people who are doing the appointment of families and individuals into English providers. It's a catastrophe waiting to happen.'

– Barrister

Some participants emphasised that Scotland is doing things differently, describing how the approach of the Scottish Government is both more co-ordinated and strategic. Key examples here include the decision to fund centrally targeted legal advice and worker resources for Ukrainians:

'I guess that we've got time to make sure that all of our preventative work is in place in terms of being a destination country. And what we have been talking about, certainly in the last couple of weeks, is trying to raise awareness at Scottish Government level and Scottish local authority level in terms of the specific needs of this cohort, the specific risks and trying to kind of shore up coordination at a local level, accessible information. We've drafted up some leaflets, we've been trying to work with the Ukrainian community. The Government has funded... a legal advice hub which is in place and shortly to set up a worker resource centre.... But it's been quite proactive on our front in terms of trying to raise the awareness and put in place what is required and that kind of gendered nature and that child-specific focus and also this kind of exploitative focus and keeping people's minds on people that are here already and the risks there'.

– NGO

2.3. Homes for Ukraine

The *Homes for Ukraine* scheme was a core area on which participants' concerns centred. Participants raised numerous, recurrent and serious concerns with *Homes for Ukraine*, from its planning to implementation to potential effects in terms of human trafficking and exploitation.

'We're concerned in terms of the matching scheme, about the checks that have been done and the accountability around that in terms of the process and in what order those checks are happening, are they happening in time, and then about the onward escalation process when hosting placements do fall down and access to mainstream accommodation at that point – will the local authorities be able to provide that, given the numbers?'

– NGO

'...we were all kind of in agreement that it's easy to see how the fast-tracking of the Home for Ukraine Scheme has created a scenario where exploitative situations can arise and potentially thrive.'

– NGO

It was not that participants were against the idea of community hosting *per se*, but rather that – especially in the context of human trafficking and exploitation – they were concerned that core risks had not been adequately considered and that there was far too little in the way of forward planning and mitigations. Many stressed that hosts had been inadequately prepared and informed, with a clear lack of expectation management, training, guidance and support. Additional concerns were raised that the £350/month payment for hosting might incentivise sponsorship among people who are, at best, naïve and ill-equipped and, at worst, actively unscrupulous and seeking to exploit refugees.

'There are so many people who do want to be generous and do the right thing, but we all know that there are people who are looking at this as a ripe pickings opportunity for criminality.'

– Barrister

Risks of domestic servitude were most commonly flagged, but fears were also raised that hosts might seek to exploit their guests in other labour markets, for their benefit entitlements²⁸, sexually and/or otherwise. Several participants drew a distinction between actively predatory hosts and more opportunistic ones. There were also concerns about how conditions in placements may erode more subtly and gradually, becoming increasingly exploitative over time. In this respect, participants identified several contributing factors including language barriers, differences in cultural expectations, inherent power imbalances, economic constraints and lack of access to alternatives should things go wrong. One participant suggested that the way the Government guidance leaves open questions around chores and contributions to bills seems to heighten the risks of boundaries blurring and hosts acting exploitatively.

'To me the biggest concern is the sort of medium/long term perspective and that so far there don't seem to be any formalised processes for monitoring and safeguarding in the medium to long term. I think the problem with these placements in private households is also this slipping of burdens that at first might not be exploitation but then there's an increase in burdens placed and because it is a slipping process, and it is within what is the home there is a tendency to not sort of see those processes.'

– Academic

²⁸ Here, it is notable that known or suspected benefits-related exploitation has featured heavily in the experiences of many EU nationals trafficked in the UK. See, Cockbain, E. *et al.* (2022) [Examining the geographies of human trafficking: Methodological challenges in mapping trafficking's complexities and connectivities](#), *Applied Geography*.

'... the welcome guide they've [i.e., the UK Government] given at the moment when they come for the Homes for Ukraine Scheme tells people that they can be expected to help with household chores and pay a contribution towards household bills, which I think is very dodgy; I think it needs a much clearer line on what's allowed and what's not allowed. Because there are people who live near me, and I live in a rural area, who are clearly thinking it would be nice to get some Ukrainians to use their holiday lets when they're not in use, they'd get some money for it, and they could do some housework – it's like getting a free au pair'

– Barrister

Numerous participants expressed concerns about confusion and a lack of clarity around eligibility and vetting procedures for the *Homes for Ukraine* scheme. A police officer who had been working with Ukrainian community leaders described frustrations around the application process being unduly complex and time-consuming, suggesting that *'it needs simplification, and it needs a bit more clarity'*. There was also evidence of confusion and misunderstanding both among roundtable participants and the public with whom others worked, especially around the checking process, and specifically whether unaccompanied minors can be placed through this scheme. According to a government official at the roundtable they cannot, and the UK immigration rules say children can only be granted visas if they are travelling with or joining a legal guardian. We heard, however, conflicting accounts about what is happening to visa applications from children in practice and it is unclear whether separated and unaccompanied minors are consistently having cases granted outside the main rules. Jennifer Blair from the Ukraine Advice Project highlighted situations in which Ukrainians already in the UK were struggling to find routes by which they would be eligible to bring their children here and were therefore considering 'entering into very difficult agreements with people so that someone else will bring their child to the UK'. Overall, there was some confusion among participants around the situation of separated and unaccompanied minors and how they might be processed in the UK visa system, balancing competing risks and needs. From the perspective of checks on hosts, participants in different regions within the UK reported that local authorities themselves were struggling with insufficient, unclear and/or inaccurate information around checks and limited options should issues arise:

'...there isn't a lot of clarity on when these checks will happen and how... also some local authorities have fed back that for some sponsors they think that the check has to happen before but that's not actually the case ... then also what powers actually local authorities have if they find that those checks sort of upturn problems. They actually don't have a lot of levers that they can pull at that point'

– Academic.

'...the main concerns that are coming through for us from local authorities are the checks that they need to do on the hosts under the Homes for Ukraine Scheme. So, there's quite a lack of clarity about what checks are being done when people are coming in and at what stage the DBS [Disclosure and Barring Service] checks should be done by the local authorities. There's a lack of information coming through to the local authorities which means that often when they're deciding which level of DBS check to do... For example, if they're told that a single adult is coming through, they'll do the lower level of DBS check but then on visiting that person they've discovered that that person has children with them so, you know, inappropriate checks have been done.'

– Community partnership

The matching process was a particular area of concern for many participants. As flagged at the event, devolved nations have responded to the challenge of matching hosts and Ukrainian refugees differently: Ukrainians are able to put down the Scottish Government and, more recently, the Welsh Government instead of a named individual sponsor. The individualisation of matching elsewhere and lack of centralised support to connect potential hosts and guests were seen to have created additional risk. Participants were particularly worried that this gap meant would-be sponsors and refugees were turning to strangers on social media to find matches: a move seen as understandable but, from an exploitation perspective, highly risky. Matching on Facebook, for example, was described by one NGO participant as *'an invitation to traffickers'*. Meanwhile, an academic flagged some specific but non-representative examples they'd seen of worrying UK-related posts on a global matching site: *e.g.*, those explicitly seeking an orphaned child or trying to recruit refugees to do live-in care work for their agency, with no separate accommodation.

'I'll be honest, we've been horrified at the matching.'

– NGO

'Some people obviously already had friends here they could stay with, but many didn't, and they had been waiting for the scheme which had been mentioned a lot by the Government in the media. So, people have approached organisations to help them match, churches, things like that, but also have been self-matching on social media.... But the Facebook groups, it will be people sharing a photograph, a few words about themselves and it very much feels like a kind of dating website; lots of people getting back to them and saying, "Oh yes, I'll have you" kind of thing.'

– Jennifer Blair, Barrister and Co-Founder of the Ukraine Advice Project

Throughout the event, numerous participants from different professional backgrounds stressed concerns around the lack of clarity and accountability around longer-term and ongoing monitoring of placements and mechanisms for flagging, escalating and addressing concerns. Here, specific issues were raised around safeguarding gaps for children and other vulnerable populations and an apparent lack of planning and resourcing for when placements break down.

'Within the current schemes, safeguarding in this process seems to be quite vague. We live in a country where UK-born children regularly die or experience abuse within their homes and my concern is the lack of monitoring, the lack of vetting... We have the DBS scheme but it's only the people who are caught who show up in DBS safeguards.'

– Academic

'...we're also really concerned about the potential for the breakdown in host and guest relationships and what happens when people leave their host family situation. They're not compelled to remain in that situation for their visa requirement so we're really worried that we're just going to lose people when they leave those situations. They're going to be very vulnerable to be going to other people's houses and just kind of going off the radar really.'

– Community partnership

Importantly, participants reported being aware of placements under *Homes for Ukraine* that had already broken down. Although hosts commit to having a spare room or self-contained property in which to house refugees for at least six months, they are not bound to honour this commitment. In light of the on-going housing crisis, several participants were concerned about who would be responsible for alternative housing provisions in the event of breakdowns and how they would be able to meet these needs in practice.

'...we have heard that Ukrainian families are already presenting as homeless in some local authorities. Six months is a long time to sign up to host somebody and as far as we can work out there's no back-up for what happens if it goes wrong, although on paper there is. But in reality, there is a housing shortage, as we probably all know, and there's already thousands and thousands of Afghans waiting for housing in hotels, so what happens if a hosting placement goes wrong, where are the Ukrainian people going to go?'

– NGO

2.4. Ukraine Family Scheme

Although the *Ukraine Family Scheme* was not discussed anywhere near as extensively as *Homes for Ukraine* or the *Seasonal Worker Visa*, major concerns were raised here too. Participants spoke of a worrying disparity in funding for local authorities supporting refugees under the two different schemes. In contrast to *Homes for Ukraine*, they stressed that local authorities are not currently being given additional funding for refugees coming under the *Ukraine Family Scheme* despite the fact that 'actually some of the needs might be higher' (Academic). Central here was the question of housing: people arriving on the *Ukraine Family Scheme* will not necessarily have any accommodation on arrival, let alone something suitable for

longer-term stays. As with other discussions in the roundtable, participants situated their concerns here in the context of chronic housing shortages.

'Local authorities have quite limited responsibilities to house homeless people, only if they're in priority need or whatever the test is in the specific devolved area, so there will be a situation where people arriving from a conflict zone with significant language barriers are accessing quite limited support.'

– Academic

The dangers of these gaps in provisions were starkly illustrated in the case of a Ukrainian man who had previously been trafficked in the UK and was now returning under the *Ukraine Family Scheme* without any accommodation and with complex needs:

'I'm working with a gentleman who was trafficked previously. He's a Ukrainian man who was trafficked in the UK in the construction industry in the past. His nephew is sponsoring him under the Ukraine Family Scheme but his nephew's not going to house him. The man's got quite complicated needs and his nephew barely knows him, I think, but he's happy to help him with the visa. But he's somebody who will need wraparound support when his visa is granted, he's not just going to be going to work on Monday and renting privately on his own, he would need all of that arranged for him and there's not really any provision for that.'

– Jennifer Blair, Barrister and Co-Founder of the Ukraine Advice Project

As participants alluded to, homelessness and dire economic need can render people particularly vulnerable to being trafficked and exploited²⁹. These issues have also been associated more generally with entry into survival sex work³⁰ and the UK is going through a cost-of-living crisis at present. It is therefore worth highlighting two further disparities between the *Ukraine Family Scheme* and *Homes for Ukraine* that were not mentioned on the day. Unlike with *Homes for Ukraine*, people hosting refugees under the *Ukraine Family Scheme* are not entitled to the £350 monthly payment, nor are refugees themselves being offered the same £200 one-off payment per person to help them meet their basic needs on arrival.

2.5. The Seasonal Worker Visa and the Ukraine Extension Scheme

The *Seasonal Worker Visa* is pre-existing short-term visa that interacts with the new *Ukraine Extension Scheme*, because Ukrainians on time-limited *Seasonal Workers Visas* are likely to need to apply under the *Ukraine Extension Scheme* for further leave to remain. Ukrainians already in the UK on a *Seasonal Worker Visa* were repeatedly identified as a group at high risk of human trafficking and exploitation in the UK, including but not limited to the extremes that could constitute 'modern slavery'.

²⁹ See, e.g., Cockbain, E. & Brayley-Morris, H (2018) [Human trafficking and labour exploitation in the casual construction industry...](#), *Policing: A Journal of Policy and Practice*.

³⁰ See, e.g., Worden, D. (2020) [Sex work in a pandemic- criminalising survival](#). The Justice Gap.

'...the risk of exploitation is real, and it is high, and our Russian and Ukrainian caseworker appears to be witnessing it in real time.'

– Dr Olivia Vicol, Work Rights Centre

'Whether it will cross the threshold into trafficking or not will be case-specific but under the seasonal worker visas themselves, the conditions can be quite exploitative.'

– Jennifer Blair, Barrister and Co-Founder of the Ukraine Advice Project

Participants from both the Ukraine Advice Project and the Work Rights Centre reported that they are already supporting numerous Ukrainians who came to the UK on these visas and are now in hyper-precarious positions. As they explained, seasonal workers are recruited via four licensed agencies and then placed in farms and other such workplaces, often in isolated rural locations. Numerous participants emphasised that there are clear and longstanding risks of labour exploitation (including the extremes of 'modern slavery') associated with this scheme. For example, previous independent research discussed at the roundtable has identified dismal living and working conditions and clear evidence of risks of forced labour³¹. The UK Government's own review of the Seasonal Worker Pilot³², also mentioned at the event, found evidence of various contractual breaches and welfare issues. In 2021, nearly 20,000 *Seasonal Worker Visas* were granted to Ukrainians (67% of the overall total for this quota-restricted scheme)³³. As participants explained, Ukrainians in the UK on *Seasonal Workers Visas* were *already* in a precarious position in terms of risks of human trafficking and exploitation, which have then been exacerbated by the war.

'A lot of them live in caravans while they're working and they're here to work very hard for very little pay for short term work placements. Since war's broken out, they have been told their visas will be extended but they have to remain with the same employer, which is unrealistic when there's just sometimes no work available with that employer. Some of them have also left because the working conditions are horrific, so I've spoken to people who then have been working in the grey economy, in carwashes and things like that, to stave off destitution, but obviously those are quite risky industries in terms of exploitation.'

– Jennifer Blair, Barrister and Co-Founder of the Ukraine Advice Project

The *Seasonal Worker Visa* is a six-month visa for horticulture (e.g., picking fruit or flowers) that has no option for extension and no route to settlement in the UK. In 2021, *Seasonal Worker Visas* were also offered to poultry workers, pork butchers and HGV food drivers. Although by law workers have the right to move workplaces within the scheme, they must remain working for the same sponsor and in practice many

³¹ Focus on Labour Exploitation (FLEX) & Fife Migrants Forum (2021) [Assessment of the risks of human trafficking for forced labour on the UK Seasonal Workers Pilot](#); Work Rights Centre (2022) [Weed out exploitation: How to improve the reporting of labour exploitation, and protect the seasonal agricultural workers staffing Britain's farms](#).

³² DEFRA and Home Office (2021) [Seasonal workers pilot review 2019](#).

³³ Home Office (2022) [National statistics: Why do people come to the UK? To work](#).

have struggled to exercise this right³⁴. Several participants emphasised that short-term and tied visas in general present well-documented risks of human trafficking and exploitation³⁵. While nobody was suggesting that all employers on this scheme are exploitative, participants frequently stressed the precarity of Ukrainians on this scheme and the limited support available to them, including in terms of family reunification. Here, Jennifer Blair gave a harrowing example from the Ukraine Advice Project of a mother who had come to the UK to do seasonal work to save up for her chronically ill two-year-old child's operation in Ukraine and was now stranded from him with no suitable route to reunification.

'...at the moment they're basically unable to apply to any of the piecemeal visa schemes set up by the Home Office in response to the war in Ukraine and they're currently stuck in extremely precarious situations.'

– Dr Olivia Vicol, Work Rights Centre

'We've been contacted by quite a few farmers worried about their Ukrainian employees and genuinely trying to do their best for them [including by sponsoring their workers' families] but it's just not the way round it should be, it creates a very unpleasant professional environment for people.'

– Jennifer Blair, Barrister and Co-Founder of the Ukraine Advice Project

The UK Government's initial response was automatic visa extensions for Ukrainians on the *Seasonal Worker Visas* – but only until 31 December 2022 and they were required to remain working for the same sponsor (regardless of how much work was available), had no access to public funds and no route by which to bring their children or other family members to safety in the UK. It appears that many do not seem to have been notified of this extension. On 29 March 2022, shortly prior to the roundtable, the UK Government shifted its position to announce the *Ukraine Extension Scheme*³⁶, under which Ukrainians on *Seasonal Worker Visas* (and other short-term visas) could apply³⁷.

Roundtable participants described this development as a 'massive change in circumstances' (NGO) and an important step towards addressing risks of human trafficking and exploitation of Ukrainians in the UK. Here, as elsewhere in the roundtable discussions, free access to the labour market was seen as an important protective factor, reducing these Ukrainians' dependence on their sponsors and employers for accommodation, immigration status and the availability of work. Yet, while welcoming this policy change, participants remained concerned it did not go far enough towards addressing the needs and vulnerabilities of Ukrainians on *Seasonal Worker Visas* (let alone broader risks of exploitation associated with the *Seasonal Workers* scheme at large). They also questioned whether the information would be communicated clearly enough to eligible Ukrainians, describing the whole situation as quite 'confusing' (NGO). At the time of

³⁴ FLEX & Fife Migrants Forum (2021) [Assessment of the risks of human trafficking for forced labour on the UK Seasonal Workers Pilot](#).

³⁵ Similar concerns exist around the Overseas Domestic Worker Visa, for example. See Mantouvalou, V. & Sedacca, N. (2022) [Trapped in Cycles of Exploitation: The UK Overseas Domestic Worker Visa 10 Years On](#). *UK Labour Law Blog*.

³⁶ Foster, K. (2022) [Statement of Changes in Immigration Rules](#), Statement made on 29 March 2022.

³⁷ FLEX (2022) [Filling the gaps: preventing increased risks of exploitation for Ukrainian workers on the Seasonal Worker Visa](#).

writing (26 April 2022), the UK Government webpage³⁸ with information for Ukrainians already in the UK mentions the *Ukraine Extension Scheme* and that it will open on 3 May 2022 but does not provide any further information on the new provisions or external links. As we found to our own detriment, there is a real risk that the subsequent information on the page can then be misinterpreted as relating to the new provisions, not the old ones.

Although announced on the 29 March 2022, the *Ukraine Extension Scheme* only opens on 3 May 2022. Participants expressed concern about this long delay, the potential for heightened risks of exploitation in the meantime, uncertainty around how quickly applications will be processed and what (if any) support will be available to these Ukrainians before, during and after the processing of their application. Further concerns centred around difficulties this group of Ukrainians may continue to face in bringing their children and other family members to join them in the UK. Ukrainians on the *Seasonal Worker Visa* and the *Ukraine Extension Scheme* finally have a route to sponsor their family members to join them in the UK. While good in theory, participants were concerned that people who have been (or still are) working for low wages and living in cramped caravans on isolated farms, for example, may understandably struggle to meet the accommodation requirements³⁹ for the scheme (it will be via *Homes for Ukraine*). Moreover, there was little sense among participants of what – if any – provisions are available to help local authorities in supporting Ukrainians on *Seasonal Worker Visas* or the *Ukraine Extension Scheme*.

‘How will a worker be moving on from manual labour in farming to a situation where they have sufficient space to bring families into as a sponsor? You know, all that period [i.e., the wait between when the scheme was announced and it goes live] is obviously quite concerning because people will be desperate to secure additional income to be able to bring their family members. So, the situation of the seasonal scheme, it’s really worrying.’

– NGO

Moreover, and as some participants highlighted, Ukrainians who came to the UK on *Seasonal Worker Visas* but then left their work placements (e.g., due to exploitation) may have their visas that were curtailed or expired. Consequently, these Ukrainians are *still* excluded from the new provisions if their leave to remain ceased before 1 January 2022. Participants expressed concern that for Ukrainians in this unenviable position, the only route to regularisation appears to be via asylum claims, where there are long delays and where people with pending claims are not allowed to work or to bring family to safety. Undocumented Ukrainians such as these were therefore characterised as being at particularly acute risk of human trafficking and exploitation in the UK. The human costs of such precarity were further illustrated in a powerful vignette, some of which is reproduced below.

‘Oksana and her partner effectively had no choice but to flee to London that autumn. She explained that they had spent a lot of money on the [Seasonal Worker] Visa, the flight, the work clothes and other items like shoes and medicines and bedding and pots and plates and they had to make that back. So, they both stayed in London. She

³⁸ HM Government (2022) [Ukrainian nationals in the UK: visa support](#)

³⁹ *Homes For Ukraine* is open to ‘anyone in the UK with a spare room or home’ but they must (1) be able to ‘offer accommodation for at least 6 months’ and (2) be either a British citizen or have leave to remain for at least 6 months.

works as a cleaner, her partner, the medical student, works as a labourer...She has two degrees, he's training to be a surgeon, he can't use his medical skills in any way and they're just stuck in this precarious situation working for people who know that they're vulnerable and who dangle the threat of deportability above their heads with every opportunity...their only option is to apply for asylum but, interestingly, and tragically I think, they're reluctant to do it. They've heard about the delays in the system, they know that they don't have a right to work while their applications for asylum are being considered.'

– Dr Olivia Vicol, Work Rights Centre

3. Information gaps and information overloads may exacerbate risks of human trafficking and exploitation

Participants repeatedly stressed the importance of helpful, accessible information to support the various key constituencies needing information and guidance, in particular refugees themselves, but also hosts, local authorities and businesses. Effectively communicating such information was seen as an important mechanism both to help Ukrainians with integration in the UK and to increase awareness of and resilience to risks of human trafficking and exploitation, and access to support should things go wrong.

'Being pushed to displacement, people never planned to go and get employed elsewhere, to go and live elsewhere, they don't understand how systems operate and that all requires some kind of deciphering and practicalities. More general orientation courses, topic-specific orientation courses on labour markets, on educational systems, on health systems, on where to report abuses and so on, that's all very much needed.'

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

'[There are] concerns over the whole process here in the UK, ranging from cultural understanding of what is and isn't acceptable in a different environment and context, you know, and how we do actually get the right information to the people and a lot around awareness-raising. Both on the accommodation side of things but also within the work environment ... and the impact of trauma on those people as well and it's just not being recognised enough there.'

– NGO

Numerous different guides, flyers, resources and other information and awareness-raising initiatives being developed and deployed in the UK in relation to Ukraine were mentioned during the roundtable,

particularly from civil society participants but also law enforcement, industry and beyond⁴⁰. There was clear evidence of much goodwill and a genuine desire to provide help. Some international participants also flagged that there is currently already extensive messaging in Ukraine and bordering countries around human trafficking risks⁴¹.

However, participants also identified three major points of caution. First, and as indicated previously, people in desperate situations are often forced into making risky decisions. Participants thus stressed that it is insufficient to just do awareness raising without also explaining and investing in safer options and routes to support as needed. Second, participants emphasised that simply promoting, say, phone numbers for helplines is insufficient if reasons for and the benefits of getting in touch are not made clear and the promoted support services are not adequately resourced to deal with a surge in contacts⁴². Third, participants cautioned that with increased activity in this area there also is a risk of duplication, information overload and resources becoming fragmented, decentralised and hard to find. Participants thus talked of the trade-offs (and associated risks) of relevant parties being under-supported with information or overloaded with excessive and/or potentially conflicting or inaccurate resources. These points came through very clearly at the event, as shown in the quotes below:

'... telling people you might be exploited isn't that great if you don't tell them what to do about it when they are being [exploited] and they haven't got a way of getting out of it.'

– Barrister

'...it's not sufficient, as practice demonstrates, just to put the numbers of the hotlines. The message about the hotlines should be really encouraging so that people really see the benefit of contacting, checking and seeking advice, not being afraid that they will just disturb people with some stupid questions and be pushed back and so on.'

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

⁴⁰ A non-exhaustive selection of activity mentioned on the day included: work led by Hope for Justice to develop a repository of resources and encourage coordination across the anti-trafficking sector; NACCOM good practice guide for hosts; VITA SafeREFUGE support packs for hosts, refugees and communities, and their on-going work on resources around trauma-informed hosting; guidance for businesses currently being developed by Responsible Recruitment Toolkit and the Association of Labour Providers; awareness-raising information leaflets for Ukrainians developed by TARA Scotland, in coordination with the Scottish Government; information leaflets from the Gangmasters and Labour Abuse Authority; and flyers from the Met Police seeking to encourage reporting of war crimes in Ukraine.

⁴¹ Key examples mentioned included large-scale distribution of anti-trafficking flyers to refugees arriving at the Polish/Ukrainian border and repeated broadcast of anti-trafficking messaging on Ukrainian TV. The OSCE was reported to be collecting information on anti-trafficking responses to Ukraine, including samples of awareness raising materials from across Europe, to share through their network of participating states and partners for co-operation.

⁴² The OSCE's (2022) [recommendations around anti-trafficking prevention in response to Ukraine](#) contains further discussion on the use of helplines, among other areas.

'I'm concerned that there may be an oversaturation of information... it feels like there's a lot of kind of instinct at the moment, especially from consortia... to sort of just list all of the possible organisations that may be relevant for people to get in contact with...without actually thinking what that journey is going to be like for the person trying to navigate an already very complex thing.'

– NGO

In response, participants made a compelling case for the need to be more focused, judicious and selective in terms of information-sharing, scaling back and thinking much more critically about what is trying to be achieved, who can best help and how to make the pathways to support much smoother in practice. Ukrainian participants stressed the importance of key information coming from trusted, official sources. Participants also emphasised the importance of accessibility, both in terms of online and offline options and translations into relevant languages. It was also suggested that advice should be formulated in a way that it does not only focus on the extremes of exploitation, which could be off-putting for those who do not identify with labels such as 'human trafficking' and 'modern slavery'.

'Us as professionals are finding it hard to understand the different routes and the possible responses, how dangerous it is for people who have very few resources and are in a desperate situation just being signposted back and forth, so the need to really coordinate the response and simplify it better and only signpost directly to organisations that can help.'

– NGO

'We've tried to pitch the leaflet so it's not like too high a bar so more like if you feel uncomfortable, if the relationships are beginning to kind of degrade and stuff this is where you can go, and there's a list of organisations that you can go to for help, ranging from, you know, local authorities to Police Scotland in the most extreme instances.'

– Civil servant

Although numerous participants called for some sort of 'welcome pack', be it for Ukrainians, hosts or others, only two specifically referred to the new UK government guide for Ukrainians arriving in the UK (published 29 March 2022)⁴³. The two who mentioned it both did so in the context of perceived inadequacies, pointing for example to gaps around how exactly to establish whether a given labour offer was exploitative in practice. Notably, there is as yet no equivalent official guidance for hosts. As mentioned at the roundtable, the NACCOM network of NGOs and service providers has recently produced guidance for prospective hosts to try plug this gap⁴⁴.

⁴³ HM Government (2022) [Welcome: a guide for Ukrainians arriving in the UK](#). (Published 29/3/22, last updated 7/4/22, last accessed 27/4/22)

⁴⁴ NACCOM (2022) [Hosting Good Practice Guide. Part 1: Key considerations for prospective hosts](#).

'So, they've given people this welcome guide which explains they have rights and labour rights and this and that, but it doesn't tell them how to check that out.'

– Barrister

'...there's a lack of appropriate materials out there in terms of what people's rights and entitlements are when they come to the UK and signposting people to the appropriate authorities to exercise those rights and entitlements... We've suggested that there's a need for a welcome pack for anyone who's been placed in the UK under the scheme so that they can access those rights and entitlements fully.'

– NGO

4. Insecurity, fear and the broader political climate around immigration and asylum create difficult conditions in which to respond

The current UK response to the war in Ukraine takes place, of course, against a backdrop of its historical and current responses both to refugees in general and to human trafficking and exploitation. The UK's visa-based system of supporting Ukrainians is itself a product of this system. Unsurprisingly then, another central theme from the roundtable was the broader climate around immigration and asylum in the UK and how that intersects in the context of the war in Ukraine with risks of and responses to human trafficking and exploitation. There were two focal points here: (1) fundamental tensions in the UK's political climate around immigration and asylum; and (2) associated challenges in reporting human trafficking and exploitation.

4.1. Fundamental tensions in the UK's political climate around immigration and asylum

Participants frequently emphasised ways in which the UK's so-called 'Hostile Environment'⁴⁵ affects both risks of and responses to human trafficking and exploitation⁴⁶. Some described a fundamental difficulty in reconciling ostensibly supportive responses to Ukrainians with a broader climate of anti-immigrant policy and rhetoric:

⁴⁵ In the wake of the Windrush scandal, the Government has shifted away from the term, and now prefers the 'Compliant Environment'. We use the term 'Hostile Environment' here because it reflects what participants actually said. The JCWI describes it [as follows](#): 'Some use the term "Hostile Environment" to describe all policies which make life difficult for migrants living in the UK - treating them as less deserving of dignity and humanity than British citizens. More specifically, it is a set of policies introduced in 2012 by then-Home Secretary Theresa May, with the aim of making life unbearably difficult in the UK for those who cannot show the right paperwork. Or, as she said at the time; "The aim is to create, here in Britain, a really hostile environment for illegal immigrants."'

⁴⁶ For more on the tensions between the UK's agendas on migration and on 'modern slavery', see, e.g., Gadd, D. & Broad, R. (2018) [Troubling recognitions in British responses to modern slavery](#), *The British Journal of Criminology*.

'It's like a social switch that needs to be flicked because the narrative has been so strong over so many years. I find it quite challenging to think about how these things will operate in a way in which they're meant to operate, so the hosting scheme and so on, when the overarching framing of provisions for refugees and people seeking asylum has been so poor for so long.'

– Academic

As recognised by participants, Ukrainians will not typically be processed as refugees through the UK's existing asylum system. Participants raised concerns, however, that people fleeing the war in Ukraine who fall through the gaps of the UK's new Ukraine-specific visa systems will nevertheless need to enter the asylum system if they want to secure regular status. The main groups flagged here were non-Ukrainians fleeing the same war (e.g., international students, also discussed on page 19), Ukrainians already undocumented in the UK and Ukrainians whose status becomes irregular in the future, for reasons including but not limited to experiences of human trafficking and exploitation. Participants repeatedly stressed that immigration insecurity fuels human trafficking and exploitation. They also emphasised how long processing times for asylum claims and the lack of the right to work in the meantime render people especially susceptible to labour exploitation⁴⁷. For several participants then, efforts to tackle human trafficking and exploitation in relation to the war in Ukraine were inextricably linked to broader considerations around dismantling the 'Hostile Environment' and improving the asylum system at large. To this end, both UK-based and international participants stressed the importance of improving provisions for other refugee groups.

'Like certainly we're hearing from the Home Office a lot of, you know, "We can be flexible, we will consider people outside the rules," completely ignoring the hostile environment that's been created and how, you know, that's really not enough trust for people to come forward.'

– NGO

'It has to happen not only by widening the goalposts of the three visa schemes in response to pressure from civil society but also by fixing the asylum system because no one should have to wait for four or five months for an initial screening interview and have to make ends meet in the meantime by working precariously.'

– Dr Olivia Vicol, Work Rights Centre

⁴⁷ These concerns resonate with academic research, in which people seeking asylum have been identified as existing in a state of 'hyper-precarity', e.g., Lewis, H. et al. (2014) [Precarious lives: Forced labour, exploitation and asylum](#).

'To me, there is a fundamental issue about how we respond as a system and nation to all conflicts. We need to really push on reframing migration, seeking asylum as a starting point so that all people from all places have access to safe, fulfilling lives. Refugees should be treated equitably, wherever they come from. Responses by nation encourage inequity of treatment, outcomes etc.'

– Academic

Concerns raised at the roundtable around the corrosive impacts of the 'Hostile Environment' on responses to the war in Ukraine and beyond are particularly salient given on-going policy developments in this space that speak to an escalation in anti-immigrant policy. In particular, the UK Government's Nationality and Borders Bill (going through Parliament at the time of writing) and its recently announced plans to deport asylum-seekers to Rwanda have both been widely and heavily criticised not only for being inherently inhumane but also for actively fuelling risks of human trafficking and exploitation⁴⁸.

4.2. Challenges in reporting experiences of human trafficking and exploitation

At the roundtable, participants from police and labour enforcement strongly emphasised the importance of human trafficking and exploitation (including 'modern slavery') being reported to them and expressed concern that too often information did not reach them.

'...what we need as a police force is reporting, we need people to come back to us and tell us about exploitations...I'm concerned that we hear lots of anecdotal evidence but very little of it is then tracked back to ourselves and we are one of the bodies who can do something about it'

– Police officer

Yet, several other participants raised concerns about practical barriers to people being able to come forward to the authorities, including both victims/survivors themselves and members of the public. Some such challenges related to how traffickers control the people they exploit: for example, another police participant gave examples from their recent experiences working with other (non-Ukrainian) Eastern Europeans who had been trafficked⁴⁹.

⁴⁸ E.g., Breese, E. (2021) [Borders Bill will be 'catastrophic' for victims of modern slavery, MPs told](#). The Big Issue; Simpson, F. (2022) [Children's charities condemn plans to send refugees to Rwanda](#). Children & Young People Now.

⁴⁹ These issues around fear and control resonate with extensive findings in the human trafficking literature. For more information, see, e.g., Cockbain, E et al. (2020) [Using law enforcement data in trafficking research](#). In J. Winterdyk and J. Jones (eds.) *The Palgrave International Handbook of Human Trafficking*.

'...in both cases victims were too afraid to ask for help and did not know that help was available. The perpetrators have told them that if they did go to the police they would not be believed and that their families/children would be hurt if they were to speak up.'

– Police officer

There are other issues, however, centred around law enforcement capacity, constraints and responses. Here, for example, participants questioned whether and to what extent police and labour enforcement bodies actually respond adequately to reports, citing both general issues with under-funding of labour inspectorates and specific experiences in which concerns had apparently been dismissed, minimised and/or not pursued further. For example, when a police officer asserted in a breakout group that 'we are very trauma-informed, victim-centred now when it comes to dealing with victims of trafficking, and exploitation in particular', other participants described issues from their personal and/or professional experiences that highlighted problems in practice⁵⁰. Some of the issues raised here were linked by participants directly to broader issues around the 'Hostile Environment': most notably the lack of a firewall between law enforcement and immigration enforcement and how that can deter people who have been trafficked or otherwise exploited from reporting and put them in danger of deportation if they do⁵¹.

'I have worked in the police personally in my time and I still think culturally there is a stigma attached to trafficking, probably not necessarily in those dedicated task forces but culturally across the police, and sometimes if you're dealing with your local bobby, they may not necessarily have the tools or the upskilling to deal with it. And coming from an anti-trafficking background, I felt like I'd wasted my time [trying to report] so how on earth is a member of the public who is just concerned going to feel? They're going to be put off and we're not going to get that help we need.'

– Independent

'...police can share data on immigration status with the Home Office and I think that can be a real, you know, barrier to people wanting to report if their status is insecure... undocumented people are in such a vulnerable situation then if reporting it is going to lead to them basically, you know, perhaps being detained or deported because there isn't a way to extend it, then it makes it particularly important, you know, to be able to report securely.'

– Academic

⁵⁰ Again, these points resonate with the broader evidence base, e.g., findings from HMICFRS' (2017) [inspection of UK police responses to 'modern slavery'](#) and Cockbain *et al.*'s (2022) [research into labour trafficking in the UK](#).

⁵¹ The UK Home Office has so far declined to implement such a firewall for victims and witnesses of crime, despite these issues long being raised as a deterrent to reporting modern slavery and other offences, such as domestic violence. See, e.g., Focus on Labour Exploitation and Latin American Women's Rights Services (2022) [Preventing and Addressing Abuse and Exploitation: A guide for police and labour inspectors working with migrants](#).

Some participants flagged concerns about whether undocumented Ukrainians would be treated compassionately by the authorities even if formally identified as ‘modern slavery’ victims through the UK’s National Referral Mechanism (NRM) system. Although specific expectations differed between individual participants, what united them was a notably bleak outlook and lack of confidence in the UK’s response.

‘If and when people do get recognised as victims of trafficking, they’re not necessarily going to get protection from the immigration system and they’re likely to be detained and deported, particularly if there’s any criminality involved in their experience of trafficking. That’s just because of... yeah, because of the way the system works in the UK, it’s not very protective.’

– NGO

‘Unfortunately, what’s likely to happen I think is that that person would then remain in this sort of undocumented sort of limbo status, which is a disaster, you know, because they couldn’t actually be deported but they may not get appropriate status.’

– Transnational organisation

In light of various such barriers and challenges around formal reporting of human trafficking and exploitation, several participants stressed the importance of also having alternative pathways for refugees from Ukraine.

‘...[there is] a question about who is...best placed to reach individuals that are particularly at risk and the importance of ... organisations that involve Ukrainian nationals as well, migrant-led or Ukrainian-led organisations.’

– NGO

‘If they face any kind for exploitation along the way, instead of going directly to the authorities, which they might be more concerned about, if there are intermediaries who are more trustworthy and who people don’t fear as much. So, I think that that is going to give people a safer option for them to reach out for assistance.’

– Dr Idrees Ahmad, University of Stirling

5. Longer-term strategic planning is vital but seems to be lacking to date

Cutting across many of the themes explored at the roundtable, was the question of how best to meet the needs of those fleeing the war in Ukraine and seeking refuge in the UK. Participants recognised the many challenges involved in meeting these needs. In relation to risks of human trafficking and exploitation specifically, one NGO participant asked: ‘to what extent can we uphold standards of safeguarding designed in times of peace and normalcy for a crisis?’ In exploring these challenges, the need for longer-term strategic planning alongside crisis interventions was repeatedly emphasised, with various participants drawing lessons from both the past eight years of conflict and displacement in Ukraine (2014-2022) and from other wars. Participants warned about the dangers of not preparing for refugees needing to stay away from home beyond the short term, of relying too heavily on humanitarian aid organisations over state actors, and of assuming that the current levels of compassion towards Ukrainians will last indefinitely⁵².

‘...an attempt really should be made to try to help people integrate into their host societies, asking the question “What if this war drags on for a long time?” So, envisaging kind of worst-case scenarios, “What if these people have to stay here longer?” it’s not only one-month urgent aid.’

– Dr Anastasia Riabchuk, National University of Kyiv-Mohyla Academy

‘...if this crisis lasts long and the situation lasts long, this welcome that we are seeing in many countries may not last.’

– Dr Idrees Ahmad, University of Stirling

‘What I saw from my research on international humanitarian development aid organisations is that they’re quite good in offering this immediate urgent aid ... mobile clinics to give out food, hygiene items, to build temporary module houses, to house people temporarily, but when it comes to more long-term planning of course these international humanitarian aid organisations are not political actors and they’re limited in their ability to think more strategically and plan more long term.’

– Dr Anastasia Riabchuk, National University of Kyiv-Mohyla Academy

As some participants highlighted, there are various (understandable) knowledge gaps around the longer-term implications of the war in Ukraine for risks of human trafficking and exploitation, and how these may evolve over time. While considering the specificities of the situation in Ukraine is clearly important, as participants highlighted, there is also important existing evidence both from other mass conflicts and broader systemic issues identified in the UK that could usefully inform current and future responses.

⁵² For further discussion around compassion fatigue and a reminder of the UK’s history of xenophobia towards Eastern Europeans, see, e.g., Ahmad, I. (2022) [Europe’s Hospitality for Refugees Won’t Last Forever](#). Foreign Policy.

'We know that traffickers will target vulnerable groups, particularly in times of crisis, but we also know that in times of conflict the lack of income, the lack of access to healthcare, to education, the breakdown of the rule of law, securing access to basic needs such as food and water, can mean that not only have we got predatory traffickers, we've got a hugely vulnerable population, so prevention measures and support and protection are absolutely key.'

– Dame Sara Thornton, Independent Anti-Slavery Commissioner

Although participants widely emphasised the importance of a long-term, well-coordinated strategic response alongside effective crisis interventions, many simply did not feel that either was strong at present in much of the UK domestic policy response (as described earlier, Scotland seemed to present something of an anomaly). Considerable concerns were raised about an apparent lack of strategic planning for the longer-term integration of refugees from Ukraine and for the mitigation and monitoring of various risks, including but not limited to those associated with human trafficking and exploitation. One participant also flagged concerns around the availability of vital support services in more rural areas, suggesting it was inadvisable for Ukrainians to be resettled in isolated locations. In contrast to these perceived gaps, several mentions were made of cross-sector work among anti-trafficking and related NGOs to try to ensure a more 'joined up' and strategic response to Ukraine.

'...what are the long-term safeguarding measures, what's going to be the inspection, the oversight? There's no formalised process for safeguarding.'

– NGO

'...frankly, I would say most local authorities at the moment feel in crisis management mode and so that longer term planning of integration needs I'm not sure is happening...the thought process about education, healthcare, employment, etc.'

– Academic

Many participants stressed the importance of successfully integrating Ukrainian refugees into the UK, both as an important goal in its own right and to reduce risks of human trafficking and exploitation. This discussion on integration took four main forms. First, participants stressed the vital importance of secure immigration status and ready access to the labour market, education, healthcare and other core services. Here, the ability to ensure local qualifications were recognised and accredited in destination countries was also stressed. Second, participants highlighted the need to empower and mobilise existing community groups and organisations to assist in supporting Ukrainian refugees. Third, participants agreed on the importance of involving Ukrainians (and other migrant-led groups) in strategic planning and service delivery, highlighting that their expertise and knowledge can help both in reaching more people and ensuring responses are more nuanced and culturally sensitive. Specific examples included working on helplines and helping establish community support initiatives. Fourth, discussion covered the need to acknowledge the negative health effects and trauma associated with war and displacement. Several participants urged the need to adopt a trauma-informed approach, working to give people maximum

security, to reduce fear and helplessness, and ensure access to psychological and other support services as needed. Overall, thinking ahead and acting strategically now were seen as vital in mitigating risks, building resilience and ensuring solid plans are in place for issues that might arise. The dangers of responding to refugees through all-encompassing ‘total institutions’ such as refugee camps⁵³, rather than facilitating community integration were also starkly highlighted. In this respect, community hosting could have obvious advantages – if done safely and well, at least. Roundtable participants’ focus on the importance of both integration and thinking ahead also raises an important question: what plans are being put in place for Ukrainian refugees who, after three years in the UK, want and/or need to stay longer?

‘... in any disaster preparedness response, we need to think about the long-term implications. Refugee situations don’t tend to be always a crisis situation and acute, they do tend to become protracted over time and if we don’t respond correctly, they will become difficulties and issues and problems. So, the early intervention and early responses are really crucial.’

– Academic

‘But what we see from experience of IDPs [internally displaced people] in Ukraine since 2014 is it is very important for them to be integrated into their host societies as quickly as possible, not to be in isolated spaces. And we see this in many other wars that refugee camps that are set aside are actually not a good idea. Even though it may seem like a good idea because people can get all that assistance in one space that is isolated, protected and all their needs are cared for by this type of ‘total institution’ ... because it keeps people really dependent on this international humanitarian aid for extended periods of time and they are not integrated into societies; they do not know how their host societies operate, what rights they have, [and] how they can secure their needs on their own’

– Dr Anastasia Riabchuk, National University of Kyiv-Mohyla Academy

⁵³ The same, or worse, could of course be said of immigration detention centres.

Conclusion

'...most people do not want to become refugees... it's a life where you're deprived of so many rights and the normality of life, so people would much rather be in their homes.'

– Dr Idrees Ahmad, University of Stirling

Russia's war in Ukraine has caused mass destruction, displacement and devastation. The history of past conflicts and emergent evidence from Ukraine both indicate that this war will also create and amplify opportunities for human trafficking and exploitation. War and displacement put people in desperate situations, and there are considerable risks to both those who remain in Ukraine and the many millions of refugees forced to leave. When people are in danger and/or struggling to meet basic needs, they may have little option but to make risky decisions – even if they themselves are aware of the risk involved. Unfortunately, as this roundtable has shown, the risk does not end when people cross the Ukrainian border, and countries of transit and destination also have a vital role to play in reducing risks and building resilience. The UK is no exception. It has a responsibility to support Ukrainians, and indeed non-Ukrainians fleeing the same war. Part of that support means ensuring that responses are alert to the risks of human trafficking and exploitation and appropriate measures are put in place to improve prevention, monitoring, and the provision of support. As roundtable participants noted, such interventions need to be sensitive to refugees' needs and designed and delivered in a way that does not (further) harm already marginalised groups. Nuance is important, too; participants stressed that Ukrainian refugees are not a homogeneous group, highlighted particularly high-risk groups and situations and called attention to sources of resilience as well as those of risk. As with any crisis response, there will likely be difficult decisions and careful trade-offs to be made. This roundtable showed that experts were deeply concerned that the new risks associated with this war will interact with existing systemic risks in the UK, producing situations where human trafficking and exploitation are inevitable. We do not wish to scaremonger: hopefully, the vast majority of refugees will find the UK to be a place of sanctuary. Overall, however, roundtable participants expressed concern that the UK's current domestic policy response was inadequate. They called on the UK Government to address stark gaps and risks in current responses, such as major safeguarding issues, deficits in information, funding and support, and insufficient provisions for Ukrainians already in the UK, particularly seasonal workers and those who are undocumented. They emphasised the need to think not only in terms of crisis interventions but also longer-term strategic planning, bearing in mind that the war may be protracted and risks in the UK to refugees from Ukraine may increase over time.

The policy recommendations informed by this analysis of the evidence-gathering roundtable can be found on pages 6-8.

Annex:

Contributors and acknowledgments

Organisations represented at the roundtable

- After Exploitation
- Anti-Trafficking Monitoring Group
- Association of Labour Providers
- Bail for Immigration Detainees
- Border Force
- British Red Cross
- Civil service, other
- Department for Education
- Department for Justice, Northern Ireland
- Doughty Street Chambers
- Economic and Social Research Council
- Focus on Labour Exploitation (FLEX)
- Furnival Chambers
- Gangmasters and Labour Abuse Authority (GLAAA)
- Helen Bamber Foundation
- Homes for Ukraine
- Home Office
- Hope at Home
- Hope For Justice
- Human Trafficking Foundation
- Independents
- International Organization for Migration (IOM)
- Just Right Scotland
- Lancaster University
- Local Government Association
- Love146
- Metropolitan Police Service, Slavic Police Association
- Migration Yorkshire
- Missing People
- Modern Slavery and Human Rights Policy and Evidence Centre
- National Crime Agency
- National University of Kyiv-Mohyla Academy
- No. 5 Chambers
- National Police Chiefs' Council Modern Slavery and Organised Immigration Crime Unit
- Office of the Children's Commissioner for Northern Ireland
- Office of the Independent Anti-Slavery Commissioner
- Organization for Security and Co-operation in Europe (OSCE), Office of the Special Representative and Co-ordinator for Combating Trafficking in Human Beings
- Police Scotland
- Scottish Government
- Sheffield Hallam University
- SOHTIS (Survivors of Human Trafficking in Scotland)
- Stronger Together
- Suchasnyk Plus
- TARA (Trafficking Awareness Raising Alliance)
- TISC report
- Trilateral Research
- UCL
- Ukraine Advice Project
- Ukrainian Institute London
- UK Research and Innovation
- University of Exeter
- University of Gloucestershire
- University of Hull
- University of Oxford
- University of Leicester
- University of Sheffield
- University of Sussex
- University of Stirling
- University of Waikato
- University of Warsaw
- United Nations Office on Drugs and Crime (UNODC)
- Unseen
- VITA
- Wesley Gryk Solicitors LLP
- Work Rights Centre

Key speakers, in order of appearance

Dame Sara Thornton DBE QPM, the UK's **Independent Anti-Slavery Commissioner**, responsible for encouraging good practice in the prevention and detection of modern slavery and the identification of victims. She was previously Chief Constable of Thames Valley Police and the first Chair of the National Police Chiefs' Council. She is the Chair of the Government Skills and Curriculum Unit Leadership Advisory Board, an Honorary Air Commodore in the Royal Air Force and an Honorary Professor in Modern Slavery at the Centre for the Study of International Slavery at the University of Liverpool.

Dr Claire Healy, United Nations Office on Drugs and Crime (UNODC) Research Officer. She co-ordinates the **UNODC Observatory on Smuggling of Migrants** and conducts **research on trafficking in persons and smuggling of migrants**. She is the former Senior Advisor and Research Officer on Trafficking in Persons at the International Centre for Migration Policy Development (ICMPD), where she conducted policy-orientated research on human trafficking, migrant smuggling and migration in West Africa, South America, the Middle East and Europe. She has conducted research and authored key reports about human trafficking in the context of conflict and mass displacement.

Dr Anastasia Riabchuk, Associate Professor in Sociology at the **National University of Kyiv-Mohyla Academy**. Her research focuses on labour and the labour movement, poverty and marginality in post-Soviet contexts, and the specific vulnerabilities of frontline communities in the Donbas region of Ukraine. Alongside extensive professional experience on the topics covered in the roundtable, unfortunately she now also has direct personal experience as a refugee – like so many Ukrainians. She is now in Paris as a **PAUSE Scholars at Risk Fellowship at INALCO**, the University of Languages and Civilizations (Institut National des Langues et Civilisations Orientales).

Jennifer Blair LLM (International Human Rights Law), **Barrister at No.5 Chambers, Co-Founder of the Ukraine Advice Project** and legal consultant to **Ukraine Advice Scotland** (which is run by JustRight Scotland). She is a specialist in refugee law, modern slavery law and equalities law. She is a regular advisor to refugee and migrant charities, including Migrants Organise (where she is their modern slavery lead) and Helen Bamber Foundation (where she is a legal protection advisor and the former Co-Head of Legal Protection). She is a member of the advisory group for the Migrants Mental Capacity Advocacy Project. She has co-convened the Home Office's equalities stakeholder engagement subgroup and she regularly acts in legal proceedings in England and Wales

Dr Olivia Vicol, Director of the Work Rights Centre: a charity that supports migrants to access employment rights and improve their social mobility in the UK. A trained anthropologist, her doctoral research was an ethnography of Romanian migrants' trajectories into precarious jobs in London. She specialises in migrant workers' experiences of injustice, conducting research at the Work Rights Centre and in collaboration with academics. She recently published a report on the experiences of Seasonal Workers on British farms and is currently working with the Gangmasters and Labour Abuse Authority to remove barriers to reporting exploitation.

Dr Idrees Ahmad, Lecturer and journalist at the **University of Stirling**. He specialises in conflict and migration and has written extensively on these topics. He is the Director of the International Journalism programme at the University of Stirling. He writes for the *New York Review of Books*, the *Times Literary Supplement* and *Foreign Policy* on the subject of war and migration. His book on the war of narratives over Syria will be published by Columbia University Press this autumn.

Elvira Mruchowska, Director of **Ukrainian Anti-Trafficking NGO Suchasnyk Plus**. She is a Ukrainian anti-trafficking specialist with over twenty years practical experience in the field. She is currently in Canada, working in British Columbia in the resettlement programme of the Ukrainian Canadian Congress (UCC). She has been working on the development and implementation of new websites and hotlines, to provide accessible information sources in multiple languages to Ukrainian refugees arriving in Canada.

Dr Laura Wood, medical professional and researcher at the **Helen Bamber Foundation** and **VITA**. She is a paediatric doctor with a special interest in child and family modern slavery. She is the Research Director and Child & Family Modern Slavery Lead at VITA, a clinician led organisation dedicated to advancing the health response to modern slavery. She is conducting doctoral research at Lancaster University with the Helen Bamber Foundation. She is also involved in the Royal College of Paediatrics and Child Health guidance and response to child trafficking, an Associate of the Childhood Trauma Recovery Network and a Trustee of the Trauma Recovery Centre. She is currently engaged with the health response to the Ukraine humanitarian crisis, the support of displaced international healthcare students and the ongoing development of VITA's trauma-informed resources for refugees, hosts and advocates.

Tetiana Rudenko, Senior Co-ordination Adviser at the OSCE **Office of the Special Representative and Co-ordinator for Combating Trafficking in Human Beings**. She leads the Office's efforts to prevent and combat trafficking in human beings in relation to Ukraine. She previously worked at the OSCE Project Co-ordinator in Ukraine (PCU), where she initiated and implemented numerous projects around human trafficking, domestic violence, cybercrime and gender inequality. Since 2014, there she also facilitated the PCU's assistance to conflict-affected populations in Ukraine, including internally displaced people, ex-combatants, their family members, and people who cross the contact line. She has contributed to the UN Model Law Against Human Trafficking, several state programs to combat human trafficking, the national action plan on 'Women. Peace. Security' and Ukrainian national laws on human trafficking and domestic violence.

About the authors

Dr Ella Cockbain, Associate Professor in the Department of Security and Crime Science at UCL and visiting research fellow at Leiden University in the Netherlands. Her research focuses primarily on human trafficking, child sexual abuse and labour exploitation. She believes firmly in the importance of nuanced, evidence-informed and context-sensitive responses to complex social phenomena. She has worked closely with various organisations across the public sector, civil society and industry on issues related to human trafficking and exploitation. She is the former co-chair of the UK's Modern Slavery Strategy and Implementation Group on prevention, and a current member. A previous 'Future Research Leaders' fellow of the Economic and Social Research Council (ESRC), she is the Director (Principal Investigator) of a major ESRC-funded programme of research into human trafficking, under which this roundtable was organised. She also heads up the Research Group on Human Trafficking, Smuggling and Exploitation at UCL.

Dr Aiden Sidebottom, Associate Professor in the Department of Security and Crime Science at UCL. His main research interests are problem-oriented policing and crime prevention. He is a co-investigator on the ESRC-funded programme of research on human trafficking, under which this roundtable took place. On that grant, he plays a leading role around stakeholder engagement and impact-related activity. He leads and/or collaborates on numerous other projects related to crime prevention and policing. He is a member of the academic advisory board for Her Majesty's Inspectorate of Constabulary and Fire and Rescue Services and a judge for the international Herman Goldstein Award for Excellence in Problem-Oriented Policing.

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This report is very much the product of people coming together to share their knowledge and it could not have happened without participants' real generosity with their time and ideas. We are deeply grateful to everyone who participated in this roundtable. Additional thanks to the invited speakers (named above) for their thought-provoking and important talks and breakout room chairs for their support (they came from Focus on Labour Exploitation, the Helen Bamber Foundation, Hope for Justice, the Human Trafficking Foundation, and Unseen). We are particularly grateful our Ukrainian speakers and participants for finding the time for this roundtable amid such devastation. We also would like to thank several key people for helpful comments on drafts of this report: Kate Roberts (FLEX), Jennifer Blair (No. 5 Chambers and the Ukraine Advice Project), Katherine Lawson (IASC), and Olivia Hesketh (Modern Slavery and Human Rights Policy and Evidence Centre). Thanks to Dr Rebecca Nako for the final proofread. At UCL, we are grateful to our colleagues in the Department of Security and Crime Science: Donia Khanegi and Clare Roper for all their support in organising the event and running the technical side, and Alexandre Bish, Aliai Eusebi, Catalina Mellado Nealy, Jose Luis Hernandez and Valentina Stincanu for assistance on the day. We would also like to thank Warren Langler-Watts for setting this report and TypeOut for transcribing the event. Finally, we gratefully acknowledge the contribution of the Economic and Social Research Council, who funded this roundtable as part of UCL's ongoing research programme on human trafficking (grant ref: ES/S008624/1).

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Questions and comments about the material contain this this report can be directed to Dr Cockbain (e.cockbain@ucl.ac.uk). Ukrainian and Russian translations will be available soon.