

## Protection from sexual exploitation and abuse: reflections from the first year of the emergency

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**Protection from sexual exploitation and abuse is an integral part of the Ukraine refugee response. A number of policy implications, innovations and lessons for the ongoing response and for future crises have emerged.**

Since the full-scale Russian invasion of Ukraine nearly one-third of the Ukrainian population have been forced from their homes, and 6.3 million Ukrainians are now refugees.<sup>1</sup> The risks of sexual exploitation and abuse (SEA) are high, given that women and children represent 87% of those displaced and many are separated from their families.<sup>2</sup> Moreover, a wide range of actors are involved in the response, including volunteers, informal networks, and others with limited humanitarian experience. As the emergency continues, these risk factors are expected to be compounded by increasing socio-economic vulnerabilities, difficulties in finding safe long-term accommodation, and potential fatigue among hosting communities.

UNHCR deployed PSEA (Protection from sexual exploitation and abuse) experts in neighbouring countries from the onset of the crisis, and then recruited dedicated PSEA Coordinators at country and regional level. These staff members provided essential technical support, capacity building and coordination throughout the first year of the emergency.

National PSEA Networks are in place in the main response countries, spearheading and supporting collective PSEA efforts. There is also a Regional PSEA and Safeguarding Network in place to ensure coherence and exchange of practices across the different countries.<sup>3</sup> To promote localisation and sustainability, each of these PSEA Networks is co-chaired with national actors or NGOs – VOICE in Hungary, Plan International in Moldova, Fundacja Dajemy Dzieciom Siłę and Plan International in Poland, Terre des Hommes in Romania, and the National Centre for Human Rights in Slovakia – and bring together more than 170 members across the five countries, including

national and local NGOs, refugee-led and women-led organisations.

The networks engage with refugees, jointly finding ways to communicate risks in linguistically and culturally appropriate ways. In Slovakia, for example, the refugee-led organisation Sme Spolu ('We are together') found that traditional descriptions of SEA alienated and created fear among refugees. They therefore adapted the messages by avoiding "PSEA" terminology and using formulated positive messages, such as "you will not be blamed" and "you will be listened to". These were packaged into broader messages about how to stay safe in their country of asylum, and integrated into broader dialogues with refugees about safety.<sup>4</sup> Around 11,600 refugees were reached through this project.<sup>5</sup>

National PSEA Networks have also played a key role in enhancing the capacity of other actors. At the time of writing, more than 5,000 frontline workers in the neighbouring countries have been trained in PSEA by UNHCR and its partners. Training has also been provided to reception centre staff, volunteers, call centre agents, border guards and police.

### Barriers to reporting

Despite the early investment in PSEA, very few allegations have been made to date. While under-reporting of sexual exploitation and abuse is a global challenge, in the Ukraine response cultural sensitivities around gender and gender roles have exacerbated the issue. The nature of the war in Ukraine and of refugees' experiences of flight and arrival in host countries may also have impacted their willingness to raise concerns.

Many refugees express a strong sense of gratitude for being welcomed in neighbouring countries and hesitate to provide any negative

feedback for fear of being considered ungrateful. Widespread messages around Ukrainian resilience, unity and strength against the Russian invasion, as well as feelings of guilt or responsibility for family members left behind, may also influence people's willingness to come forward with concerns. This may be further aggravated by gaps in information and accessibility of complaints mechanisms, and by language and diversity barriers.

From experience in other emergencies, we know that it may take time for allegations of SEA to come forward. We can therefore expect a potential increase in reporting as the response continues, and as our mechanisms for reporting and our engagement with the community are strengthened.

#### **Engagement with non-traditional actors**

The Ukraine response has been characterised by a vast array of volunteers and private citizens getting involved. Examples include students staying at reception centres at night-time to receive new arrivals, pensioners translating for border guards, and Ukrainian diaspora and church groups handing out food and toys at assistance hubs in neighbouring

countries. Individuals and companies from across Europe drove buses and minivans to the border areas to offer transport, and in border towns many local residents offered Ukrainians free housing or help to find work.

This exceptional outflow of solidarity has been accompanied by challenges. Many refugee women have expressed difficulty in distinguishing between actors on the ground, and in assessing what offers of support are legitimate and whom to trust. Will I be safe with this family offering me shelter? Is this bus taking me where the driver says he is going? How can I make sure this offer of work does not end up being exploitative?

With a multiplication of actors on the ground and limited oversight by the authorities, there is a risk that individuals with predatory intentions will gain access to vulnerable, and often traumatised, individuals. In some reception centres, refugee women and children have been left at the hands of whoever was guarding the centre at night, and at several transit points they felt sufficiently uneasy that they risked jumping on the first bus, hoping it would take them where they wanted to go. UNHCR and other humanitarian actors therefore advocated



Refugees from Ukraine wait to register for cash assistance in Warsaw, Poland, March 2022. Credit: UNHCR/Maciej Moskwa

with local and central authorities for stronger oversight, information for both volunteers and refugees, and safe complaints and feedback mechanisms.

It has proved challenging to reinforce traditional notions of PSEA in a context where those delivering assistance did not consider themselves to be humanitarian workers or to be bound by global standards. Many volunteers and non-traditional actors had limited knowledge of the safeguards needed to protect refugees. There was also a widespread perception that SEA concepts were foreign, difficult to understand, not consistent with national laws, or not applicable in the context of volunteerism.

### Training materials and resources

Considerable effort was put into building basic awareness of standards of conduct from the early days of the response in all response countries. UNHCR developed a ‘Dos and Don’ts’ leaflet for volunteers<sup>6</sup> and offered PSEA briefings. The Regional Protection Working Group issued Guidance on Vetting and Registration of Volunteers and Volunteer Organizations,<sup>7</sup> which outlines concrete and practical recommendations for host States, such as the requirement for all volunteers to carry a visible ID and receive regular briefings and training, and the need for background checks on volunteers, plus oversight and reporting mechanisms. The PSEA Task Force in Hungary drafted and translated a suite of tools: a Volunteer Undertaking, a basic Code of Conduct for volunteers to sign, and a leaflet with 11 Key Safeguarding Messages.<sup>8</sup>

The integration of minimum safeguards in contingency and preparedness planning – involving the full range of actors on the ground – is paramount to prevent the occurrence of SEA in similar emergencies.

### Threats in the digital space

Risks posed by the digital space have also been evident. A vast array of digital communities and channels (including on Facebook, Telegram, Viber and WhatsApp) and matching platforms offer to connect refugees with information and offers of transportation, accommodation and employment. While mostly driven by the best intentions, such

initiatives – and more generally, the online space – have provided a fertile ground for criminals and offenders to prey on vulnerable people, especially as these platforms have minimal to non-existent content moderation and reporting features.

From social media monitoring and consultations with Ukrainian women and children, UNHCR has gathered information on instances of gender-based violence as well as risks related to: online grooming and recruitment; exploitation and trafficking; personal identity theft, and scams. This included instances of humanitarian staff and volunteers approaching adolescent refugee girls online. In response, UNHCR launched a pilot project on digital safety in Hungary in mid-2022 to conduct tailored awareness sessions for refugees and to identify solutions for strengthening safeguards which could be adopted by individuals who administer and monitor social media groups.<sup>9</sup> Through the regional ‘Stay safe’ campaign, UNHCR has also reached 4.2 million people with information in Ukrainian and Russian on how to reduce risks of trafficking, SEA and other types of gender-based violence.<sup>10</sup>

### Safeguarding in the context of localisation

In line with the localisation agenda and the Global Compact on Refugees, meaningful engagement with local and national actors has been emphasised throughout the Ukraine response. National NGOs and refugee-led organisations constitute 63% of partners in the Regional Refugee Response Plan. In addition, 48 grant agreements for refugee-led and community-based organisations were funded by UNHCR in Europe in 2022.

Local organisations have brought a wealth of experience, capacity and local knowledge which has been crucial to the overall response. However, although their closeness to communities has been a great advantage, it has also presented specific challenges in terms of PSEA, as most actors were new to humanitarian work. Some local organisations hesitated to acknowledge the risk of SEA, considering it an ‘external threat’ or an isolated occurrence. Even some women’s rights organisations reportedly showed reluctance to introduce

policies on PSEA, as they did not perceive that risks could also come from within their own organisations.

Fostering an environment conducive to preventing SEA and strengthening organisational capacities are processes which require time and resources, and it was at times challenging to reconcile the overall aim of increased localisation with the need for all partners to adhere to global PSEA standards. For UNHCR and its partners, capacity building and training for the full range of actors on the ground have been a priority.

### Reflections and recommendations

Faced with the prospect of a protracted war in Ukraine, dwindling resources and support over time, and a potential increase in SEA allegations coming forward, the humanitarian community needs to maintain its attention to PSEA as an essential part of the Ukraine refugee response. At the same time, the response so far has given rise to a number of policy implications, innovations and lessons to be taken on board for future emergencies.

Firstly, the Ukraine refugee response has underscored the importance of proactively providing dedicated PSEA capacity from the start of an emergency as an integral part of the overall response.

Secondly, the response has validated the importance of a comprehensive approach to PSEA which reflects and includes the diversity of actors involved in a response. It calls for global guidance and tools to engage with volunteers and other non-traditional actors who do not always operate under contractual obligations or commitments to PSEA. This requires increased investment in capacity and system building for national and local partners from donors and UN agencies, notably through dedicated funding for their PSEA work. This is particularly relevant for women-led and refugee-led organisations, which are the most trusted by refugee communities.

In addition, the Ukraine response underlines the importance of engagement with government authorities in ensuring compliance with PSEA standards within its own structures and in providing oversight of volunteers and other non-traditional actors on the ground.

Engagement with regional organisations and institutions could also be considered.

Thirdly, a call for stronger commitments from online platforms, technology companies and State authorities is urgently needed to ensure preventive and risk-mitigating measures in the digital space. Concrete action should include better curation, more transparent and accessible reporting features in social media communities, and proactive monitoring for exploitative or harmful material by administrators or moderators. It also requires effective responses to concerns, such as expeditious content removal and enforcement mechanisms for failure of platforms to comply with existing standards.

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3. Regional PSEA and Safeguarding Network: [bit.ly/safeguarding-network-ukraine](https://bit.ly/safeguarding-network-ukraine)
4. Sme Spolu Information Pages: [smespolu.org/informacna-podpora/](https://smespolu.org/informacna-podpora/)
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7. Vetting and registration of volunteers and volunteer organisations guidance: [bit.ly/vetting-organisations-ukraine](https://bit.ly/vetting-organisations-ukraine)
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