



Evidence Review

Safeguarding in Ukraine, Moldova, Poland and Romania in relation to the conflict in Ukraine (2022)

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Acronyms

AoR	Area of Responsibility
CSO	Civil Society Organisation
GBV	Gender Based Violence
INGO	International Non-governmental Organisation
IOM	International Organization for Migration
NGO	Non-governmental Organisation
OSCE	Organisation for Security and Co-operation in Europe
PSEA	Protection from Sexual Exploitation and Abuse
RRRP	Regional Refugee Response Plan
RSH	Safeguarding Resource Support Hub
SEA	Sexual Exploitation and Abuse
SEAH	Sexual Exploitation, Abuse and Sexual Harassment
SOGIESC	Sexual Orientation, Gender Identity, Gender Expression and Sex Characteristics
UN	United Nations
UNFPA	United Nations Population Fund
UNHCR	United Nations High Commissioner for Refugees
UNICEF	United Nations Children’s Fund
UNODC	United Nations Office on Drugs and Crime
WRO	Women’s Rights Organisation

Executive Summary

As the war in Ukraine continues to unfold, there is an increased need for safeguarding response and services, both within Ukraine and surrounding countries where Ukrainians are seeking refuge. Safeguarding from Sexual Exploitation and Abuse and Sexual Harassment (SEAH) and other forms of harm is increasingly being recognised as an urgent need by many actors involved in responding to the Ukraine crisis. There is a large number of at-risk groups, including women, adolescent girls, children, people with disabilities, older persons, persons with diverse sexual orientation, gender identity, gender expression and sex characteristics (SOGIESC) and ethnic minorities, including Roma. Beyond addressing the immediate need, there is also the potential for the response to contribute to a step change in safeguarding within Ukraine, building longer-term capacity to reduce the risk of harm in this acute humanitarian emergency.

This evidence review has focused on the safeguarding situation in Ukraine, Poland, Moldova and Romania. It has looked at the risk factors that impact people's safety and risk to harm, including from SEAH; the evidence towards the scale of harm caused by the humanitarian community; and considered how effective their approaches are at reducing harm and SEAH risks. Throughout the research, it was evident that the presently available literature seldom focuses on how organisations are safeguarding refugees and others with whom they come into contact, but rather on the safeguarding risks and advocacy messaging for better action to address sexual exploitation and abuse (SEA), and to mitigate child protection and gender-based violence (GBV) risks. It provides recommendations on further research for organisations to engage with, in order to strengthen their safeguarding principles and policies.

1. Introduction

On 24 February 2022, Russia launched military action against Ukraine. Russian forces have crossed into the country from Belarus in the north, Russia in the east and Crimea in the south. Conflict has persisted across major cities in Ukraine, including Kyiv, Lviv, Dnipro, Zaporizhzhia, and the Donetsk and Kherson regions. As a result, the United Nations High Commissioner for Refugees (UNHCR December, 2022a) has reported that over 7.89 million refugees have fled Ukraine, 6.5 million people being internally displaced.

The United Nations (UN) and Non-Governmental Organisations (NGOs) have rapidly scaled up their humanitarian operations in Ukraine and neighbouring countries, with a large increase in volunteers and staff working in the humanitarian context. In Ukraine, Devex (June, 2022) noted that there are currently 250 organisations helping with the aid response in Ukraine. This is double the number as compared to before the war. As such, the safeguarding risks for and from organisations working to provide support during the Ukraine crisis has significantly increased.

This report involves a desk review of existing literature on safeguarding in Ukraine, Romania, Moldova and Poland. The review looked at the following research questions:

Risk Factors

1. What are the key safeguarding **risk factors** that impact people's safety, and increase or decrease the risk of a safeguarding incident in the region (organisation level and community/individual level)?

Scale

2. What evidence is there of the scale of harm and abuse caused by humanitarian organisations and staff, and groups of individuals/volunteers in Moldova, Poland, Romania and Ukraine?

Approaches and Effectiveness

3. What **approaches** are being used/have been used by organisations, groups and individuals to safeguard people affected by the war and those involved in humanitarian action?
4. What evidence is there of the **effectiveness** of these approaches?

The desk-based research focused on identifying evidence of 'harm' caused by humanitarian actors in the response to the war in Ukraine. 'Harm' was defined according to the below parameters.

Box 1: Definition of 'harm'

RSH Eastern Europe aims to support organisations, Governments and other stakeholders involved in the response to the war on Ukraine and surrounding countries to strengthen their safeguarding policies and practices against all forms of harm. We understand harm to encompass:

- All forms of sexual violence that staff/volunteers and contractors may perpetrate referred to as **Sexual Exploitation and Abuse (SEA)** in the humanitarian sector. This is sometimes also referred to as **Sexual Exploitation and Abuse and Sexual Harassment (SEAH)**.
- All forms of violence against children that staff/volunteers and contractors may perpetrate (**child safeguarding**).
- **Physical violence, bullying and all other forms of violence** where these are perpetrated by staff/volunteers and contractors. This also includes discrimination due to racism.
- **Harm caused by organisations and staff due to lack of safeguards implemented across their operations and programme implementation.** For example, poor data collection or storage practices leading to refugees being targeted as a result of their interaction with an organisation.

Defining sexual violence in the aid sector

In this evidence review, we adopted the following definitions and understanding of sexual violence in the aid sector:

- **Sexual Exploitation:** Any actual or attempted abuse of a position of vulnerability, differential power, or trust for sexual purposes. This includes profiting monetarily, socially, or politically from sexual exploitation of another. Under UN regulations it includes transactional sex, solicitation of transactional sex and exploitative relationships (UN, 2017).
- **Sexual Abuse:** The actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. It covers sexual assault (attempted rape, kissing / touching, forcing someone to perform oral sex / touching) as well as rape. Under UN regulations, all sexual activity with someone under the age of 18 is considered to be sexual abuse (ibid.)
- **Sexual Harassment:** A continuum of unacceptable and unwelcome behaviours and practices of a sexual nature that may include, but are not limited to, sexual suggestions or demands, requests for sexual favours and sexual, verbal or physical conduct or gestures, that are or might reasonably be perceived as offensive or humiliating (UN, 2018).



A note on **transactional sex**: we have included evidence related to transactional sex, in line with the UN definition, and where the evidence points to this in relation to an imbalance and/or abuse of power based on socio-economic status or age. Many of these 'relationships' are driven by economic necessity, which can lead to adolescent girls and young women being exploited.

2. Methodology

2.1 Search Strategy

Relevant material was identified through a variety of search strategies. It was screened before review. Search strategies included:

- Google and relevant electronic database searches, using key search words,¹ including Google Scholar.
- Review of key safeguarding initiatives, audits, assessments and websites, including those stakeholders operating in the region (including UNHCR, Protection from Sexual Exploitation and Abuse (PSEA) networks, Inter Agency Updates), and Core Humanitarian Standards (CHS) Alliance, GBV Area of Responsibility (GBV AoR), Humanitarian Response, Inter-Agency Standing Committee (IASC) Task Team on Accountability to Affected Populations and PSEA.
- Recommendations from RSH Eastern Europe team members and networks, including experts working in Eastern Europe.

This regional review focused primarily on safeguarding risks in Ukraine, Moldova, Romania and Poland.

2.2 Criteria for Inclusion

The following criteria were used to determine which documents were included:

- **date**: published between 2017 – 2022 (5 years), with a few exceptions of documents dating between 2010 and 2017.
- **geographic** focus: Eastern Europe, in particular Ukraine, Moldova, Romania and Poland.

¹ Search terms included: safeguarding, SEAH, sexual exploitation, sexual abuse, sexual harassment, harm, abuse, child safeguarding, child protection, transactional sex, prostitution, rape, attack, trafficking, gender based violence, conflict related sexual violence AND Aid sector, development sector, humanitarian, conflict, NGO, civil society, Eastern Europe, Ukraine, Poland, Moldova, Romania, AND prevention, response, tackling, address, action interventions, initiative, programme, evaluation, review, research, study, evidence, learning OR disability, disabilities, disabled, child, adolescent, girl, boy, IDP, refugee, migrant, LGBTQI+.

- **availability:** publicly available.
- **thematic focus:** related to safeguarding, related to the humanitarian or aid sector.
- **language:** available in English.
- **content:** related to at least one of the research questions.
- **additional search terms** covered gender based violence (GBV) and conflict related sexual violence.

2.3 Limitations and Exclusions

The mapping is not a systematic review of literature on safeguarding risks in the context of the refugee response in Eastern Europe. It is intended to give an overview of the evidence base within the scope of available resources for the review. Data on safeguarding incidents including SEA is generally scarce, and in particular during an ongoing humanitarian crisis where the context is changing rapidly. Data might also be inaccurate. It should be noted that there may be other bodies of evidence and promising interventions which have not been well documented online and therefore have not been covered in this review.

Our searches only included documents published in English. Consequently, we expect that there may be some evidence on the scale and organisational approaches that we may have missed. Among the sources reviewed there were only a very limited number of evaluations. As indicated by the RSH Global Evidence Review of SEAH in the Aid Sector (Feather et al., 2021) there is a sense from the literature that implementing measures related to SEAH is a marker of success in itself, with less emphasis placed on evidence documenting that those measures are achieving change.

As the quality of evidence was not formally assessed, findings are caveated where needed as some caution is required where findings may have been drawn from less reliable evidence.

3. Regional Context

In 2014, Ukraine became a battleground through Russia's annexation of Crimea, allowing separatists in the Donbas region to strengthen. Therefore, before Russia's invasion of Ukraine in February 2022, there had already been over two million refugees and IDPs since 2014 (Government of Poland, March, 2022). However, since the start of the war on Ukraine, the numbers have spiked dramatically. **UNHCR noted that on 19 October 2022, there were 7,710,924 refugees from Ukraine recorded across Europe, and 4,386,102 refugees from Ukraine registered for temporary protection or similar under the national protection schemes in Europe.** There have however been 6,036,000 returnees back into Ukraine for various reasons. Russia, Poland, Germany, and the Czech Republic claim to have recorded the highest number of refugees. However, as millions are seeking refuge, the inter-agency

regional refugee response is being carried out in support of refugee-hosting countries including Poland, Czech Republic, Slovakia, Republic of Moldova, Romania, Bulgaria, and Hungary. The Refugee Response Plan is brought together by the UN, NGOs and relevant parties focused on ensuring safe access to territory for refugees and third-country nationals fleeing Ukraine. The below tables indicate the number of refugees registered under temporary protection schemes, the number of refugees in total, and the number of border crossings to and from Ukraine:

Figure 1: Number of refugees from Ukraine in selected countries in Eastern Europe

Countries featured in the Refugee Response Plan					
Country	Data Date	Refugees from Ukraine registered for Temporary Protection or similar national protection schemes	Refugees from Ukraine recorded in country	Border crossings from Ukraine	Border crossings in Ukraine
Poland	1/3/2023	1,546,354	1,546,354	8,683,718	6,585,535
Czech Republic	12/23/2022	473,736	474,731	Not applicable	Not applicable
Romania	1/3/2023	102,039	106,629	1,770,992	1,416,215
Slovakia	12/27/2022	105,124	105,370	1,047,890	788,941
Republic of Moldova	1/3/2023	Not applicable	100,494	739,438	371,718
Bulgaria	12/13/2022	148,451	51,140	Not applicable	Not applicable
Hungary	1/3/2023	33,218	33,218	2,007,706	Data not available
Total		2,408,922	2,417,936	14,249,744	9,162,409

Source: Data obtained from UNHCR. <https://data.unhcr.org/en/situations/ukraine> [Accessed on 04/01/2023].

Data from the UNHCR Regional Bureau for Europe (October, 2022a) from a sample of almost 5,000 surveys showed **that 99% of refugees are Ukrainians, 90% of all household members are women and children, 23% of households have at least one person with specific needs, 18% travelled with infants between 0-4 years old, 53% travelled with children 5 - 17 years old, and 21% travelled with someone who is older than 60.**

The International Organisation for Migration’s (IOM) Ukraine Returns Report (September, 2022b) estimated that there were 6,243,000 IDPs at the end of September 2022, and 6,036,000 estimated total returnees.²

² Defined by IOM as those who are currently in their place of habitual residence, who indicate they have returned following a minimum of 2 weeks in displacement due to the war (since February 2022).

4. Key Findings: What Evidence is Available on Safeguarding in Eastern Europe?

4.1 Summary of the Evidence Base

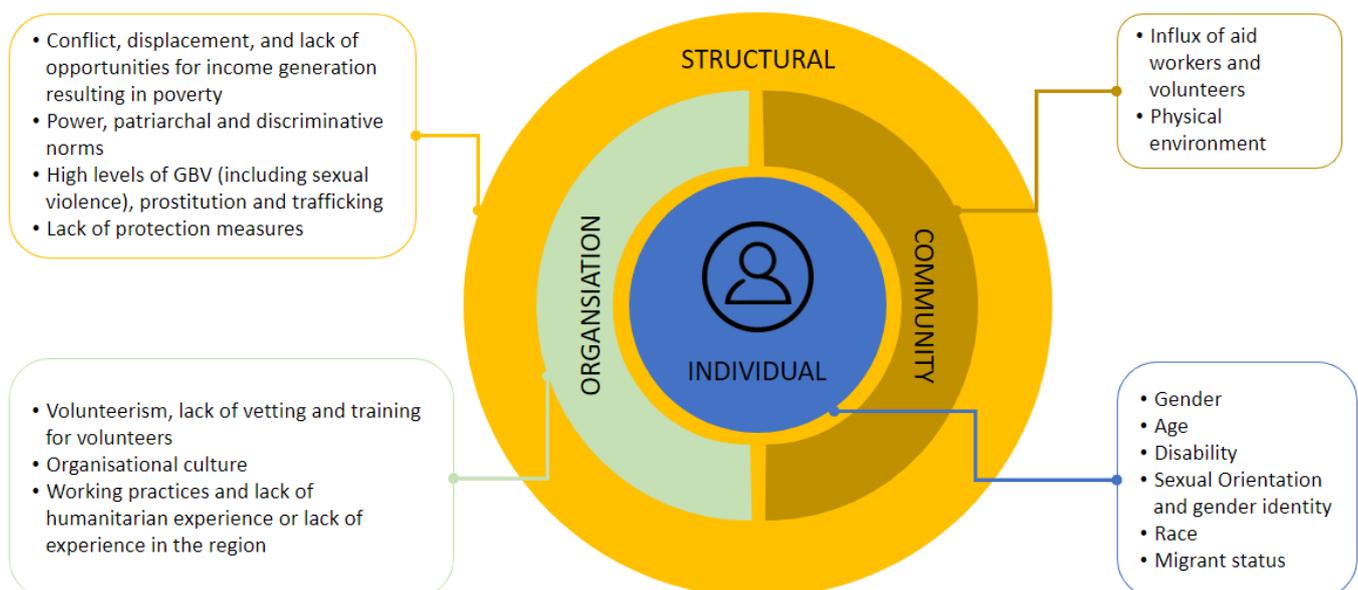
4.1.1 Strength of Evidence

There is a general lack of data, e.g. reports or publications, from organisations which are working in Ukraine and neighbouring countries on how they are addressing and mitigating safeguarding risks. The focus of the published literature is, to date, on urging organisations and authorities to be engaging in PSEA procedures and properly vet any staff or volunteers working in Ukraine. This results in limited evidence overall in relation to understanding safeguarding issues in the response to the Ukraine crisis.

4.2 Risk Factors

This section outlines the risk factors for experiencing a safeguarding incident. It is based on the adapted version of the WHO ecological framework for interpersonal violence, used in the RSH Global Evidence Review of SEAH in the Aid Sector (Feather et al., 2021) (see Figure 8). The model divides these into: structural/systemic, community, organisational and individual characteristics. It is not always clear how to differentiate the risk factors between these categories, because many of them are underpinned by prevailing social norms that condone or at least do not challenge such behaviour.

Figure 8: Risk factors identified in the literature review



4.2.1 Structural Factors

Conflict, displacement, and lack of opportunities for income generation resulting in poverty

IOM (March, 2022a) reported that the “deteriorating humanitarian situation and resulting large-scale and complex movements correlate with an increase in threat to personal safety, putting people on the move at heightened risk of exploitation.” (IOM, 2022a)

Refugees, in particular women travelling alone or those in charge of their families, often lack savings, have no access to decent work and might lack cash-based assistance, especially in the most recent refugee waves, and may look for income-generating opportunities. Issues of poverty play into the power dynamics and are a significant risk factor in SEA and other forms of violence. **Poverty and food insecurity can leave displaced women and girls, and those living in conflict zones, more vulnerable to SEA. It can lead them to adopt harmful coping strategies, such as entering exploitative, transactional sexual relationships, falling prey to trafficking or SEA, and survival sex, including exchange of sex for food or other resources, to cover their and their families’ basic needs, as well as their own safety and security** (IOM, March, 2022a; UNODC, August, 2022; VOICE and HIAS, May, 2022c; Michelis, April, 2022; RRRP for the Ukraine situation; October, 2022a).

In Poland, there have been increased restrictions for entry of displaced populations in temporary shelters. WHO (September, 2022b) found that **children have been refused entry into a shelter because they had previous entry stamps into Poland. This ‘puts them at heightened risk for GBV, human trafficking, sexual exploitation and abuse’**. Additionally, the report noted that there had been a removal of government subsidies to Polish families who are supporting Ukrainian refugees. This can disincentivise shelter and support being provided to Ukrainians and puts them at heightened risk of SEAH.

UN Women (September, 2022d) noted in their policy paper on the Global Gendered Impacts of the Ukraine Crisis that, in addition to all the above, the cost-of-living crisis has acutely threatened women’s livelihoods, health and well-being. In Ukraine:

“Alarming increases in GBV, transactional sex for food and survival, sexual exploitation and trafficking, child marriage with girls forced to leave school, and women’s and girls’ unpaid care and domestic workloads to provision households and communities are further endangering women’s and girls’ physical and mental health” (UN Women, 2022d: 4).

Power, patriarchy, and discriminatory social norms

SEAH and other forms of violence and exploitation by humanitarian actors stem from pervasive gender inequality, power disparities and harmful patriarchal norms. These shape how women and girls, as well as other intersecting identities, are perceived and treated (Anene and Osayamwen, 2019; DFAT, 2019; Ferstman, 2017; Fluri, 2012 in Feather et al., 2021). **The abuse of power by aid workers in controlling the distribution and allocation of resources in exchange for sexual services from girls and young women is a risk identified** by Feather et al.'s Global Evidence Review (2021). Initial findings in this review show that the risks of this taking place in the context of **the refugee response in Eastern Europe are high, especially when considering volunteers as part of the aid response. High wages paid to aid workers have also been seen to play into these dynamics and power disparities** (Feather et al., 2021).

Although some progress has been recorded over the years, deeply rooted patriarchal social norms and gender stereotypes shape social relations in the Republic of Moldova (UN Women and CARE, 2022). The GBV reporting rate had increased in Ukraine during the eight years of conflict prior to Russia's invasion, as well as during the COVID-19 pandemic. Poland's government has been criticised for its lack of sexual and reproductive health and rights, and women's rights, including its failure to combat violence against women, gender inequality and SOGIESC discrimination. Similarly, the UN Working Group on discrimination against women and girls found **persistence of gender stereotyping in Romania. It stated that the Government of Romania "must do more to ensure equality for all women and girls"** (OHCHR, 2020). The Gender Inequality Index (GII) shows that there is still significant work to be done in the four countries. This can be seen in the table below:

Figure 9: The [Gender Inequality Index \(GII\)](#) reflects gender-based disadvantage in three dimensions— reproductive health, empowerment and the labour market

Human Development Index & Gender Inequality Index (GII)	
Country	GII score (0-1) (2021) Value and World Ranking out of 191
Moldova	0.205 - 51
Poland	0.109 - 31
Romania	0.282 - 67
Ukraine	0.200 - 49

GNI ranges from 0, where women and men fare equally, to 1, where one gender fares as poorly as possible in all measured dimensions.

There have been multiple reports about discrimination based on ethnicity, for example towards third country nationals (including students, economic migrants, refugees and asylum seekers), and stateless populations. **Ukraine is home to more than 130 different ethnic groups, the largest being the Roma.** The Roma community face significant discrimination across Eastern Europe (UN Women and CARE International, May, 2022).

People with disabilities also face significant difficulties in Eastern Europe. While laws have prohibited discrimination against people with disabilities, they are not effectively enforced. **There is still a stigma around disability and a lack of specialised services. In Ukraine, institutionalisation is still common. There are nearly 100,000 children in Ukraine living in institutions** (Martin and Buchanan, March, 2022).

People living with HIV/AIDS may also face challenges in accessing health facilities and medication, due in part to discriminatory practices, taboos and stigma.

High levels of GBV (including sexual violence), prostitution and trafficking

In Romania, it is estimated that 30 per cent of women have experienced GBV, with violence against women still believed to be underreported and stigmatised (European Institute for Gender Equality in CARE/SERA et al., May, 2022). In Moldova, domestic violence is widespread (UN Women, July, 2022b).

ECPAT reports (2014) indicate that in the region covered by the review, child sex trafficking, child prostitution and sex tourism are widespread. VOICE and HIAS (May, 2022a; May, 2022d) report a pre-existing high prevalence of GBV in Moldova and Romania (worsened by COVID-19), including intimate partner violence, and human trafficking. Moldovan women and girls are exploited by traffickers operating in Romania and Moldova with counterfeit passports, in trafficking networks operating across Europe (VOICE and HIAS, May, 2022a), and Romania is one of the primary source countries for sex and labour trafficking victims in Europe (VOICE and HIAS, May, 2022d).

“The 3.5 kilometre gap between the crossing and the reception centre” at a Moldova crossing presented traffickers with opportunities to pick up women and children (VOICE and HIAS, 2022a: 23).

Most men³ aged between 18 - 60 have been prohibited from leaving Ukraine under martial law. Therefore, the majority of people fleeing are women, children, older people, people

³ Exemptions include: men who have a certificate of deferment of conscription and notification of enrolment in special military registration, or who were considered unfit for military registration; men in charge of three or more underage children, or of one or more underage children on their own, or a child with a disability under the age of 18 or 23 years of age (depending on the disability); adoptive parents, guardians, trustees, foster parents, men in charge of orphans or children deprived of parental care; men engaged in constant care for persons in need, in the absence of other persons who can provide such care; men who officially are permanent

with disabilities, and unaccompanied children. These groups are generally more vulnerable to SEAH and other associated harms, when in transit.

The UN noted that reports of sexual violence within Ukraine are rising fast. The national hotline on domestic violence, human trafficking, and gender-based discrimination has received multiple reports ranging from gang rape to coercion, where loved ones are forced to watch an act of sexual violence committed against a partner or a child. The UN report (June 2022) also noted how allegations of sexual violence committed by Russian troops in Ukraine are mounting.

Lack of Protection Measures

As shown by the RSH Global Evidence Review (Feather et al., 2021), in contexts where conflict or disaster may have weakened legal systems and traditional structures, it may be more difficult for people to report incidences of SEA. If/when they do, investigations are likely to be challenging to conduct (Hilhorst et al., 2018).

The GBV Subcluster in Ukraine (April, 2022) found that some at-risk groups might not be protected in Ukraine due to gaps or the failure to implement and enforce laws. For example, while in 2013 Ukraine adopted a Strategy and Plan of Action for the Protection and Integration of the Roma National Minority into Ukrainian Society, neither of these addresses gender issues or the needs of Roma women and girls (CARE, 2022, in GBV Subcluster Ukraine, April, 2022). Additionally, **many of the Roma population in Ukraine lack civil status documents, creating difficulties in accessing education, employment and health services, but also humanitarian assistance** (GBV Subcluster Ukraine, April, 2022). In addition, legal and operational gaps result in limited, if any, actual protection for survivors of GBV. Interagency coordination and cooperation in addressing individual cases remains weak and largely unstructured (Mann and Bugaiets, 2020, in GBV Subcluster Ukraine, April, 2022). UN Women (March 2022, in GBV Subcluster Ukraine, April 2022) indicates that **women's access to police has been impacted by the current crisis**.

In Poland Human Rights Watch (April 2022a) found that there are inconsistent protection measures and lack of government coordination. They found that **"volunteers, representatives of NGOs and UN agencies, and deputy police chiefs raised concerns about the lack of systematic security measures or means to identify prevent or respond to GBV, including trafficking, sexual exploitation and rape"**.

residents abroad; men who are applicants for professional higher and higher education, trainee assistants, graduate students and doctoral students studying abroad full-time.



Weakened Legal Systems

CARE (March, 2022) highlighted the ongoing national and political debate towards Poland withdrawing from the Council of Europe's (CoE) Convention on preventing and combating violence against women and domestic violence. There are CSOs who are active in providing GBV services, though the **general response to GBV is reported as weak** (CoE, 2021). **It therefore remains a concern for refugees in Poland. In 2020, Poland decided to ban abortions**, which has implications for Ukrainian women who have been raped (Adams, May 2022). While current Polish law permits abortion up to 12 weeks if it is the result of crime - rape or incest - or poses serious health risks for the person who is pregnant, in practice this is almost never performed due to the legal obstacles. **Women and girls in Poland, who are pregnant as a result of SEA perpetrated by aid workers and volunteers, would similarly have limited sexual and reproductive health rights and options to seek a termination.**

4.2.2 Community Factors

The RSH Global Evidence Review (Feather et al., 2021) found that a number of issues emerged in the literature related to community-level factors that increase the risk of SEA. One of these is the onset of a disaster or an emergency, which creates significant disruption for local populations and may lead to a breakdown in social and legal services, which might normally act as a deterrent to this behaviour.

Influx of Aid Workers and Volunteers

In Moldova, as of September 2022, over 1,400 international and national staff were working to support both development and humanitarian activities in Moldova in selected international organisations⁴ (RRRP for the Ukraine situation, October, 2022b).

There is also a large number of unregistered volunteers offering to help those fleeing Ukraine, for example, by providing accommodation and travel options (UNODC, August 2022). With many being unregistered, it has increased the risk of safeguarding incidents. **This is because, whilst governments and NGOs rely on volunteers, but they are not always registered, screened or trained. Therefore, people can either pose as volunteers pretending to help, or actually be volunteers. Some volunteers may also abuse their power to exploit or cause harm** (VOICE and HIAS, May 2022). There have also been reports of informal volunteer groups being created to lead the aid effort (The Guardian, July 2022). For example, in Dnipro, residents who found themselves jobless have volunteered to set up shelters for evacuees. These informal Ukrainian volunteer groups

⁴ EUBAM, EBRD, IMF, IOM, ILO, UNDP, UNICEF, UNFPA, UNAIDS, UNODC, UNDSS, UN WOMEN, OHCHR, WHO, FAO, WB, UNHCR, UNIDO, WFP, UNOPS

and NGOs have provided virtually all humanitarian aid. Given the informality of these, there will be a lack of safeguarding policies and procedures.

Physical Environment and Online Space

The RSH Global Evidence Review (Feather et al., 2021) shows that, in the literature, the location of distribution points presents SEA risks for women and girls if they have to travel to these locations alone or in the dark. **Reception centres and other forms of temporary shelter, which provide very little privacy and no locks on the doors, further exacerbate risks to girls and women.** CARE International (March, 2022) also noted their concern for the lack of spaces segregated by sex, posing risks of SEAH at reception centres. In their visits to shelters across the region in Spring 2022, VOICE and HIAS' (May, 2022c) assessment teams **noticed a lack of security controls in place for visitors or protection measures for displaced people hosted there, "making it easy for bad actors to enter".** In Romania, each transit centre varies in terms of GBV risks and safety concerns as well as measures put in place to mitigate risks (CARE/SERA et al., May, 2022).

This is similar in Poland, where CARE International (March 2022) reported that accommodation is an immediate concern and risk. The scale of the crisis places enormous pressure on all types of accommodation, including reception centres, temporary accommodation sites, hosts in private accommodation, state-supported housing institutions, resulting in some refugees sleeping rough.

With over 90% of people who fled into Moldova from Ukraine living with host communities in Moldova in the spring (WFP in VOICE and HIAS, May, 2022a), refugees are exposed to SEA and GBV risks. This is because they are more isolated (UNHCR, UNFPA and UNICEF, August 2022) and have limited or no access to services and assistance of any kind, and their wellbeing cannot easily be verified. VOICE and HIAS (May 2022a; May 2022c) reported that NGOs shared the concern that protection risks, including exploitation and abuse, are higher for displaced persons (in particular women and girls) residing in privately-run shelters or private accommodation (also confirmed by UNHCR, UNFPA and UNICEF's GBV Safety Audit in Moldova), because they are typically not registered. The same report mentions that **"some privately-run centres are unregistered, which is of concern, as there is some perception that these sites are purposefully not registering so that they can exploit women"**. CARE's Rapid Gender Analysis in Romania also found that "in private accommodation, the lack of vetting of accommodation and hosts and the power imbalances between the host and the refugee can create additional protection risks, particularly for single women, those who do not have other social support or networks in Romania, and refugees who have limited resources" (CARE/SERA et al., May 2022).

A GBV Safety Audit conducted by UNHCR, UNFPA and UNICEF in Moldova (August 2022) found that "there was a recognition by civil society organisations that many of the websites and chat forums set up during the onset of the emergency to link refugees in need of accommodation to Moldova individuals/families could have led to GBV risks and were not easy to monitor".

4.2.3 Organisational Factors

Volunteerism, lack of vetting and training for volunteers

Especially in the first phases of the refugee response, large numbers of unregistered volunteers who were not screened nor vetted, offered help, and in some cases also accommodation, to people who were fleeing. UNODC (August, 2022) argued that a small minority of those may have intended to traffic refugees. VOICE and HIAS (May, 2022c) argue that the **"ad hoc, volunteer-reliant nature of the current emergency response creates significant opportunities for traffickers. Volunteers are generally applauded for helping with registration, offering rides, providing accommodation, and offering other services. With this narrative in the media, a trafficker can pretend to be just another selfless person providing support"**. The same report also explains that volunteers working directly with vulnerable populations, for example at the registration offices asking for personal data and information, are often not screened or trained. This poses high risks of SEAH and other safeguarding concerns. VOICE and HIAS (May, 2022d) reported that the volunteers' registration process does not include a background check, and that "one volunteer at the Siret border said he was simply asked if he spoke Russian or Ukrainian and then given a badge to start working". CARE/SERA et al. (May, 2022) reported that many volunteers have not signed Codes of Conduct.

Human Rights Watch (April, 2022a) **conducted interviews that confirmed that workers at refugee reception points (mainly volunteers) had not been trained to spot signs of security risks for women and girls. This included trafficking and other forms of exploitation**. They further discovered that the lack of training meant identifying or responding to GBV-related incidents would be dependent upon the individual, which could become more harmful to the victim. This is especially the case when responding to someone who has reported an incident, because they may not take a survivor-centred approach or engage in 'Do No Harm' principles. Some volunteers had self-organised training sessions around preventing trafficking, 'but this was haphazard'. In Poland, "existing reception facilities are staffed by volunteers who have not benefited from specialised training on child safeguarding, Best Interests Procedure, GBV, and Code of Conduct and PSEA, or undergone a vetting or screening process" (RRRP for the Ukraine Situation, April, 2022f).

In terms of private transport, individuals have been engaged in transporting refugees for free from border points and onwards to other European countries, using private vehicles. The lack of vetting (especially in the initial stages) and general lack of regulation and oversight have attracted individuals and criminal networks that seek to take advantage of refugees' vulnerable situations (UNHCR UK, April, 2022). VOICE and HIAS reported that:

“Many organisations at border crossings and shelters reported seeing male drivers prowling and offering rides to women. They saw families getting into unverified vehicles and leaving for unverified destinations.” (VOICE and HIAS, 2022c: 25).

A learning needs assessment conducted by RedR UK (Fereday, April 2022) **identified ‘protection and accountability’ as the top learning need among actors providing humanitarian assistance in Ukraine and neighbouring countries, indicating a gap in knowledge around keeping IDPs and refugees safe from harm.** Most respondents were based in Ukraine (27%) followed by Poland (14%). **‘Safeguarding and PSEA’ was the most selected sub-theme,** including exploitation of IDPs and refugees, safeguarding risks and response, safeguarding in transitional situations/across informal networks, reporting misconduct and confidentiality. ‘Child protection’ was the second most selected sub-theme, along with GBV.

Organisational Culture

Organisational culture is a critical factor in whether or not allegations, or incidents, of SEA or workplace harassment and abuse take place (Norbert, 2017). A number of studies highlight aspects and characteristics of organisational culture and leadership, which can increase the risk of SEAH, including organisations with high levels of fraud and / or corruption, or where there is no culture of accountability or transparency (Kangas, 2018 in Feather et al., 2021).

In organisations where there are top-down management structures and where men dominate decision making space, women and girls tend to be at greater risk of sexual harassment, largely due to power imbalances and the abuse of power driven by a hierarchical organisational culture (Ibid.).

A lack of gender balance is also a potential risk factor for sexual harassment in the workplace, as well as in humanitarian settings where men are in more senior positions and may be more inclined to ‘look the other way’ when abuses take place (British Red Cross, 2018; Kangas, 2018; Norbert, 2016; Williness, 2007 in Fraser and Muller, 2018).

Other issues that emerged around organisational culture and context include fragmented leadership, weak policies and procedures, unclear reporting processes and mechanisms, poor implementation or compliance, lack of transparency and action by managers, poor follow up of allegations, and lack of training and awareness raising of staff (European Interagency Security Forum, 2019).

There was a gap in the literature around the organisational culture in Eastern Europe when this research was conducted. More may become known about specific issues relating to organisational culture and its links to safeguarding concerns in Eastern Europe in the future if further resourcing and attention is paid to this aspect.

Working Practices and Lack of Humanitarian Experience or Lack of Experience in the Region

There are a number of actors and organisations playing a vital role in the refugee response that may not have traditional humanitarian or crisis experience. They therefore may not have the more nuanced GBV and broader protection experience (VOICE and HIAS, May, 2022d). For example, in Poland, some organisations active in the humanitarian response lack experience or training in GBV and broader protection, including in protection from SEAH, for their own staff and volunteers (RRRP, October, 2022a).

Devex (June, 2022) noted how the UN and NGOs have scaled up their humanitarian operations in Ukraine. However, they have been struggling to deliver essentials such as food and water in the Donbas region, and to support citizens and displaced people across the country. This is down to the struggles with expanding and recalibrating operations to meet the growing humanitarian needs. Despite this, Devex noted that the United Nations Office for the Coordination of Humanitarian Affairs has recorded that at least 250 organisations are helping with the aid response, with more than 60% being Ukrainian NGOs. This number was double that prior to the war. The rapid increase in NGOs in response to the war means there is a lack of safeguarding systems and practices in place, which may not have been fully embedded into the organisations.

The Global Evidence Review (Feathers et al., 2021) highlighted that issues of short-term contracts and lack of job security contribute to a workplace culture where harassment and bullying prevail. National staff experience this more acutely than international staff, because contracts are generally less secure and staff may be less willing to report abusive behaviour for fear of retaliation or losing their job. This review did not find literature related to this risk as yet for Ukraine, Poland, Moldova and Romania though this may emerge over time to be congruent with the RSH global evidence review in this regard.

The lack of safer recruitment practices and screening candidates may also add to increased risk for community members, beneficiaries and staff (UNSG, 2017, in Feather et al., 2021).

This, along with a high turnover of international staff, may make it harder to identify people with previous misconduct or allegations against them. Again, whilst this review did not yet find literature related to this risk as yet for Ukraine, Poland, Moldova and Romania this may emerge over time.

The WHO (June, 2022a) echoed this, by raising their concern around the lack of vetting processes, despite workers being highly skilled and qualified. This is especially the case if people are unfamiliar with international humanitarian safeguarding standards, which could pose more risk.

4.2.4 Individual Factors

There are a number of groups that emerge in the literature as being more vulnerable to harm including SEAH. Women and girls, including younger women and adolescent girls, single women, migrant women, women and girls with disabilities, as well as children travelling alone, people identifying as SOGIESC, ethnic minorities (e.g., Roma people), and older persons are at greater risk. These are all groups who are impacted more by imbalances of power and who have an increased likelihood of being in situations where there are opportunities for abuses of power to affect them. Feather et al. (2021) note that many reports have listed several individual factors which contribute to an increased risk of poly-victimisation⁵ across all contexts and in various spheres. These characteristics (as described above) are risk factors regardless of the context, but are often cited as higher risk of SEAH ‘by aid workers and peacekeepers, of aid workers and community members.’

A large majority of refugees fleeing from Ukraine fall into one or more of these groups and face a higher risk of experiencing SEAH or other forms of harm perpetrated by the humanitarian community (VOICE and HIAS, May, 2022a).

Women and Girls

Women and children constitute 90% of refugees leaving Ukraine (European Parliament, May, 2022; VOICE and HIAS, May, 2022a). They face ‘significantly increased safety and protection risks’ (UN Women and CARE International, May, 2022). **Displaced women and girls can also be subject to sexual exploitation by service providers who take advantage of their power and position** (Michelis, April 2022). Women face particular challenges in accessing necessary services. They are experiencing a **greater loss in sources of livelihood (UN Women and CARE, May, 2022), which may increase the risk of facing SEAH and highlights the need for livelihood support to respond to immediate needs and mitigate the risk of SEAH (e.g., in food distributions)**. The most

⁵ ‘Polyvictimisation refers to the experience of multiple types of victimisation such as sexual abuse, physical abuse, neglect, bullying, and exposure to family violence versus multiple episodes of the same kind of victimisation.’ (<http://polyvictimization.org/>)



vulnerable among women are pregnant and breastfeeding women; single young women; older women; female heads of households, especially those caring for young children and older and sick relatives or friends; women from minority groups, such as Roma, and stateless women (RRRP for the Ukraine situation, October 2022a).

Female refugees are highly vulnerable to trafficking for sexual exploitation and sexual and all forms of physical violence, including from humanitarian staff (Safer Edge, March 2022a). UNFPA (August 2022) reported that multiple forms of GBV, insecurity and risk for women and girls have increased at border crossings and in transit. **During their journey, women and girls might have been sexually exploited in exchange for accommodation, transportation, documentation, food or other essential items** (Michelis, April 2022).

Unaccompanied or Separated Children

Refugee children, including orphans (orphaned due to the war, or those who were already orphans in institutional care), unaccompanied children and children separated from their families, Roma children and children of ethnic minorities, and children travelling with adults whose relationship with the children cannot be verified, are considered particularly vulnerable to SEA, whether living with extended family or in an institution, due to a lack of support mechanisms (Csaky, 2008; Davey et al, 2010; Council of Europe, March 2022; UNODC, August 2022; CARE/SERA et al., May 2022). VOICE and HIAS (May 2022d) reported that, in 2020, 72% of identified trafficking victims were sex trafficking victims, and nearly 50% were children. ECPAT (2014) reported that, in Ukraine, pre-existing the war, the number of children whose parents were living and working abroad was high, and this could leave these children more vulnerable to SEAH.

CARE's (March 2022) Rapid Gender Analysis in Poland **estimated that about 30-40% of those fleeing Ukraine are children under 14 years old and many are unaccompanied. The report mentions that there is a lack of clarity on the number and whereabouts of unaccompanied or separated children who have crossed the border into Poland.**

People with Mental and Physical Disabilities

People with mental and physical disabilities, who in "normal" [i.e., non-conflict] situations would be more reliant on family and community support systems, are considered particularly vulnerable. They are at higher risk of trafficking (UNODC, August 2022) and SEA. **Organisations from Moldova, Poland and Slovakia have reported that there was little targeted government support for refugees with disabilities. Much of this work was instead being conducted ad hoc by Organisations of Persons with Disabilities and volunteer networks.** Persons with disabilities who are not officially registered in Ukraine are facing particular barriers to accessing the support that they need (Martin and Buchanan, March 2022). Barriers to reporting SEAH also increase for women and girls with disabilities.

SOGIESC

The UN Independent Expert on protection from violence and discrimination based on sexual orientation and gender identity has expressed **'deep concern' about evidence confirming the risks faced by LGBTQI+ people who seek protection (OHCHR, March 2022). SOGIESC people are at risk of stigmatisation, harassment and violence from armed groups, civilians and when accessing aid. For example, trans and non-binary people who lack accurate gender identification markers risk being subject to discrimination and exclusion when trying to access aid.** Ukrainian transgender women who are crossing illegally, because their IDs do not match their gender identities, are also at risk (Mier and Henar, April 2022). This review has not identified any documented cases of the latter, although this is widely recognised as a risk. The lack of safe shelter for gender-non-conforming people puts SOGIESC people, in particular trans people, intersex people, and non-binary people, at risk (UNHCR, Protection Cluster Ukraine and ILGA Europe, May 2022).

Ethnic Minorities

UN Women's and CARE's Rapid Gender Analysis (May 2022) highlights that pre-existing inequalities have been exacerbated by the crisis. Minority women face additional challenges and increased protection needs. Discrimination against Roma refugees has been particularly documented, although refugees of different minority ethnic background are targeted for discrimination and neglect in the humanitarian response.

Many people who are not of Eastern European ethnic descent (non-Ukrainians, including undocumented and stateless people) have faced difficulty leaving Ukraine. People facilitating evacuations have often sent them to the end of the line and selected Ukrainians for evacuation over immigrants or minority groups, such as Ukrainian Roma people. Ethnic Ukrainian refugees may also face xenophobia and subsequent discrimination, harassment, and abuse in host countries (Safer Edge, March 2022a; UNODC, August, 2022). These groups are considered to be at higher risk of SEA and trafficking (UNODC, August 2022).

A media report highlights cases of discrimination against Roma people by actors involved in the response in Poland: *"I asked a psychologist at the centre whether she'd worked with Roma families. She replied that they were exploiting the war to make money and didn't need as much help as other Ukrainians, because 'they're more used to these kinds of situations.'"* (Moaveni, May 2022). Roma people avoid approaching volunteers and using the range of services and assistance available due to fear of stigma and discrimination: *"For the Roma, the feeling of discrimination is so common that some Roma respondents noted they no longer try to request any aid, assuming they would be denied"* (UN Women and CARE International, May 2022).



Anecdotal reports of Romani women and men facing discrimination at the border, as well as discrimination by other refugees, were also reported in Romania (CARE/SERA et al., May, 2022). Action Aid (Mier and Henar, April, 2022) reported widespread racism and discriminatory attitudes towards the Roma population in Moldova, with Roma segregated in separate shelters. **Human Rights Watch (April 2022b) reports that in Moldova, government authorities have permitted and, in some cases, instructed staff and volunteers to deny Roma refugees shelter at government-run facilities. There are accounts of Roma refugees being denied entry to reception centres. Almost all Roma refugees are being directed to the same facility, which reportedly has inferior conditions compared to other facilities.**

Additionally, the visa-free and temporary protection provisions do not apply to all non-Ukrainians, non-European Union (EU) citizens who were residing in Ukraine at the outbreak of the war, with the exception of recognised refugees and long-term permanent residents. This means that this group (including citizens of India, Russia, Uzbekistan, Bangladesh, the Democratic Republic of Congo, Nigeria and Zimbabwe, among others) may need migrant smuggling in order to leave Ukraine and enter another country irregularly. They are more vulnerable to trafficking in persons in this context (UNODC, August 2022).

4.3 Scale

While it is difficult to provide a summary of the scale of harm and abuse caused by humanitarian organisations, staff, and groups of individuals/volunteers in Moldova, Poland, Romania and Ukraine, examples have been found that indicate that the safeguarding risks are high.

4.3.1 Challenges in Estimating the Scale of SEAH

Whilst SEAH is acknowledged to be under-reported throughout the world, there are a number of factors that mean underreporting in the context of a humanitarian crisis is likely to be more significant. This might be due to the lack of awareness of reporting mechanisms, fear of retaliation and stigma, or distrust towards authorities and organisations by victims and survivors. Organisations should therefore assume abuse is happening and be taking active steps to prevent abuse.

4.3.2 Evidence of the Scale of SEAH in the Aid Sector

To date, there are very limited documented cases of actors involved in the humanitarian response directly perpetrating safeguarding incidents against refugees fleeing Ukraine. This is despite SEA being considered a high risk in this humanitarian response. UNODC (August 2022) argued that:

“There is particular concern around the risks of online sexual exploitation and abuse, as many Ukrainians use social media (particularly Facebook, Telegram and Viber) to seek support, and sex traffickers carry out the recruitment of victims and advertise exploitative services online” (UNODC 2022: 4).

According to data from Thomson Reuters (in OSCE, April 2022), “online traffic since the start of the humanitarian crisis has shown huge spikes in online searches – across multiple languages and countries - for explicit content and sexual services from Ukrainian women and girls”. On 6 June 2022 at the UN Security Council, the United Nations Special Representative on Sexual Violence, called the humanitarian crisis a ‘trafficking crisis’.

Regional

Cases of SEA perpetrated by volunteers are anecdotal. An example reported by VOICE and HIAS (May, 2022c) in Hungary:

“Direct report of a volunteer promising to bring food to people in temporary housing; upon arrival he asked the mother for sex and for her to be his wife in exchange for the food.” (VOICE and HIAS 2022c: 27).

Other anecdotal reports come from “Some volunteer women explaining that they had observed sexual exploitation happening by their male counterparts” (VOICE and HIAS, 2022c, 32).

Ukraine

Safer Edge (March 2022b) categorised Ukraine as carrying a ‘very high’ risk of safeguarding incidents among all vulnerable groups in March 2022 – the highest category on the scale used by the organisation.

UN Women and CARE International (May 2022) reported:

- **Undignified distribution of aid:** “the distribution of aid in an undignified manner (at times)” and “the failure to distribute aid in an inclusive or targeted manner, e.g., to reach individuals with restricted mobility”.
- **Discrimination in the distribution of aid:** “discrimination experienced by certain groups when seeking aid - a response common across most interviewed Roma respondents and particularly emphasised by women Roma, who noted discrimination in accessing food, shelter, non-food items, health care, education and childcare”.
- **Unsafe Water, sanitation and hygiene (WASH):** the lack of sex-segregated and well-lit public toilets and WASH facilities in IDP centres creates conditions that can increase the risk of sexual harassment and other forms of sexual violence. It increases protection risks in general, in particular to women and children.

Poland

Human Rights Watch (April 2022a) reported a **lack of security measures**: “workers at refugee reception points, most of them volunteers, were not trained to spot signs of security risks for women and girls, including trafficking or other exploitation”. The report highlights the lack of security measures in some reception centres, where non-authorised people have made their way inside centres, putting refugees at risk of being targeted by traffickers and perpetrators. The failure to uphold security measures puts refugees, particularly women and children, at risk of harm by various perpetrators.

WHO (September 2022b) found that there have been reports of SEAH in multiple locations in Poland. These have been reported to the PSEA Network Coordinator for Poland, and procedures are being followed in line with international standards. However, despite this, the length of time elapsed between alleged incidents and reporting is concerning.

Romania

VOICE and HIAS’ (May, 2022d) assessment revealed protection concerns related to SEA. They reported the example of a trafficking attempt by a man who was promoting himself through social media as representing an American obstetrician-gynaecologist association, offering to shelter 10 pregnant women. The manager of the shelter, which had significant security and registration processes in place, realised it was an attempted trafficking incident and acted to protect the women. Another example they reported concerned a man who went to a centre offering to accommodate 14 children in a remote mountain lodge. VOICE and HIAS (May 2022d) reported that both of these men were reported to the authorities.

Moldova

UN Women (July 2022b) found that the risk of SEAH in Moldova remains high.

VOICE and HIAS’ (May 2022a) assessment revealed “high levels of SEA” and reported that one women’s rights organisation (WRO) director stated that **several SEA incidents had already been reported, with no visible effort to address them**. They also reported that at the time, some of the trafficking was “happening prior to crossing the border into Moldova” with many cars with male drivers “seen prowling and offering rides to young women”.



4.4 Effectiveness of Approaches to Prevent and Respond to SEA

A number of initiatives and actions are being implemented across the region to prevent and respond to SEAH perpetrated by the humanitarian community.

4.4.1 Registration and Vetting of Responders and Security at Reception Centres and Shelters

In Romania, **efforts have been made to systematise anti-trafficking and anti-exploitation activities by registering volunteers, organisations, and those providing transportation services**. However, there have been many inconsistencies reducing the overall effectiveness, and the registration process does not include a background check. In Romania there are measures in place to screen hosts who register on the website dopomoha.ro⁶ with small fines for hosts who do not comply (VOICE and HIAS, May, 2022d). However, INGO respondents noted that this is not a fully coordinated system. For example, if a driver is 'blacklisted' on one system or in one location, the same individual may not appear as 'blacklisted' on another.

4.4.2 Training and Learning

Training and other activities to communicate information on SEAH across organisations are widely considered to be an essential approach to enable effective prevention and response. This section summarises evidence related to training and learning approaches designed to address SEAH (Feather, et al. 2021).

During their regional assessments in Spring 2022, VOICE and HIAS (May 2022a; May 2022c) noted that across the locations visited, they did not come across any volunteers working with displaced people who had been trained on PSEA. A regional analysis, which included a validation exercise during the summer of 2022, found that **PSEA teams are now operational and are providing ongoing training to frontline volunteers and deployed staff** (RRRP for the Ukraine situation, October 2022a).

WHO (September 2022b) reported that there have been varying levels of staff capacity and technical skills in GBV across partner organisations in Poland. Within the GBV capacity, WHO (September 2022b) reported that most partners had received previous training and capacity building for PSEA and psychological first aid (PFA). They also had a mix of partners with valuable field-level experience, who could share their experience in mental health and

⁶ A platform created by Code for Romania in partnership with the Department of Emergency Situations of the Ministry of Internal Affairs, UNHCR, IOM and the Romanian National Council for Refugees civilians fleeing the war in Ukraine can find all relevant information about seeking protection in Romania.



psychosocial support, survivor-centred approaches, and PFA. However, it was noted through site visits and meetings that **frontline workers would benefit significantly from capacity building to better support them to handle GBV disclosures, provide a survivor-centred approach and create a safe space.**

UNHCR (April 2022) noted that they have been working closely with IOM at the border in Poland to offer training to volunteers to help them become more aware of trafficking risks, including what to do if they see something suspicious. Training covers the core principles of protection from SEAH in humanitarian work. **It also has a specific focus on making it clear that volunteers should not be asking for anything in exchange for aid.** The agency also launched an awareness-raising campaign on how refugees on both sides of the Polish border could protect themselves and report incidents of sexual misconduct or criminal activity. This was through distributing printed materials to refugees.

The PSEA Task Force in Ukraine is operational and is guiding and supporting the Humanitarian Country Team to protect beneficiaries from SEA. It enhances the capacity of agencies and affected people to prevent and respond to SEA by aid workers in Ukraine.

4.4.3 Reporting Mechanisms

Reporting mechanisms are widely recognised as an essential element of approaches to address safeguarding concerns including SEAH. They enable incidents and concerns to be safely reported, but also to signal that SEAH is not tolerated, and perpetrators will be held to account.

During the initial phases of the crisis, VOICE and HIAS (May 2022c) noted that no clear options for mechanisms for reporting SEA by volunteers were operating in the region. Since then improvements have been made as organisations set up their own reporting systems, but many challenges remain.

CARE/SERA et al., (May 2022) found that, **as of May/June 2022 there was no coordinated mechanism to support feedback and complaints in Romania** (nor information about child- or adolescent-friendly feedback and complaint mechanisms), including regarding SEA. Refugees had volunteers or hosts as a point of contact to share concerns “who may or not have received training on addressing feedback and complaints and/or have knowledge of referral services and pathways” (CARE/SERA et al., May 2022).

The UNHCR protection team in Romania conducted a general awareness session on protection, including aspects of PSEA with refugees, noting that the **refugees have a good understanding of their rights and of the risks of SEA, but limited knowledge of the reporting mechanisms.** Additionally, they shared their concerns about safety implications, should they report eventual suspicion of SEA by humanitarians, including volunteers (RRRP for the Ukraine situation, July 2022e).

A GBV Safety Audit conducted by UNHCR, UNFPA and UNICEF (August 2022, 21) in Moldova found that "barriers to accessing support for refugees in Moldova were indicated in relation to awareness and information on services, attitudes and cultural norms, and concerns about the quality of services provided and mandatory reporting."

4.4.1.1 4.4.4 Prevention, including Community Outreach, Sensitisation and Support

In the same way that organisations attempt to raise awareness, provide information and enable action internally, a key component of any effective safeguarding approach involves outreach and sensitisation work with local communities and the beneficiaries with whom they work. This section outlines evidence related to these activities. (Feather et al. 2021).

During their regional assessments in Spring 2022, VOICE and HIAS (May 2022c) noted that across the locations visited, there was no information available for displaced people on PSEA, risks for SEA, and/or reporting of SEA. However, they did note that there were efforts to provide comprehensive information to refugees on trafficking risks and access to basic services. This was also confirmed in Moldova assessment, which found there was a "lack of legal assistance that would help women make informed decisions and access advice and support" (VOICE and HIAS, May 2022a). The RRRP for the Ukraine situation (October, 2022a) also reported **that in Moldova more than half of women surveyed said they did not have any information about where and how they could obtain help in case of and information on SEA or other forms of GBV.**

In Romania, significant efforts have been made to provide comprehensive information related to trafficking risks and access to basic services through the distribution of flyers, posters, and the website dopomoha.ro, but there is a risk that this amount of information can be overwhelming, particularly when an individual is in a state of shock or trauma.

WROs say that without continual psychosocial and protective services, women and girls remain highly vulnerable (VOICE and HIAS, May 2022d). Additionally, even if there is advice on how to stay safe and to spot the signs of exploitation, "volunteers and hosts have not been trained or provided information on the risks of trafficking and how to spot the indicators", limiting the effectiveness of awareness-raising efforts (CARE/SERA et al., May 2022).

VOICE and HIAS (May 2022d) also reported that **the Romanian government is now providing transportation to different centres and towns, which increases protection;** however, these efforts are applied inconsistently at the various border crossings.

In Moldova a GBV Safety Audit conducted by UNHCR, UNFPA and UNICEF (August 2022) found that several risk reduction actions have been achieved in Moldova through coordination among humanitarian response actors. These include **increased security**

measures at border points, the provision of humanitarian transportation, the wide inclusion of groups at risk of GBV in multi-purpose cash assistance interventions, and the management of refugee accommodation centres by predominantly women social workers.

Although there has been notable improvement in the coordination of PSEA efforts, more is needed to ensure the inclusion of local organisations and volunteer networks (RRRP for the Ukraine situation, October 2022a) and that the actions taken so far are sustained.

In Ukraine, IOM (April 2022) noted that 121,500 leaflets on safe migration and trafficking and GBV awareness raising were developed and distributed in 14 oblasts of Ukraine, as well as in Moldovan bus and train stations, transit centres for IDPs, temporary shelters and centres for humanitarian and volunteer assistance, border crossing points, shopping centres and other public places. IOM received 84 cases of protection concerns that were addressed and provided assistance to refugees, though it is not stated whether these concerns were regarding SEAH or safeguarding.

5. Recommendations

- **Embed safeguarding, especially PSEA in all stages of the response:** in a humanitarian situation like the war on Ukraine, SEA prevention, mitigation and response measures may be side-lined whilst emergency response measures take priority. However, safeguarding, including PSEA measures, must be embedded and prioritised throughout all stages of the emergency response to ensure that refugees and other people displaced from Ukraine are not further subjected to harm at the hands of aid workers and associated personnel (Malik and Mullin, March 2022). This means that organisations must prioritise developing and implementing their own safeguarding policies and procedures. They must also support their partners in this regard. Sufficient funding and technical support need to be allocated and the work needs to be done in collaboration, so as to ensure local organisations are not overwhelmed by requests.
- **Consistently vet, screen, and train all staff and volunteers:** ensure the systematic on-boarding, training and safeguarding procedures for all humanitarian staff and volunteers. All volunteers and staff should sign a Code of Conduct and understand their obligations to humanitarian principles and safeguarding, including PSEA. Regular supervision and support for volunteers is required to ensure coordination, feedback loops, as well as self-care.
- **Leverage trusted relationships to increase reporting:** in Moldova, UNHCR, UNFPA and UNICEF (August 2022) found that refugee women and girls said they have a trusted relationship with government social services and humanitarian health services at



border points/Refugee Accommodation Centres and other key locations. Trusted service providers and locations included women psychologist staff, Blue Dots (especially Baby/Mother corners), Orange Safe Spaces⁷ psychosocial staff, NGO refugee legal protection staff, Roma women cultural mediators, and specialised SOGIESC organisations. These should be leveraged as entry points for potential complaints and feedback on assistance.

- **Work with and leverage context-relevant experiences of local WROs:** VOICE and HIAS (May, 2022c) reported that despite their extensive experience on the ground, local WROs have had little opportunity to participate in shaping the humanitarian response. Partnerships and the design of services for refugees and others displaced from Ukraine should be developed with the refugees themselves and in collaboration with local WROs. Local WROs are well placed to understand safeguarding risks in their contexts.
- **Ethical partnerships:** VOICE and HIAS (May 2022) have recommended ethical partnerships, which support and promote safe spaces (virtual or actual) for staff and volunteers in women- and girl-led organisations to meet and share experiences and support one another. It ensures that these safe spaces are focused on care for staff and volunteers and not on the implementation of activities.
- **Continue to improve the safety of accommodation/shelter/transport:** continue to build and improve on the good practices that are already implemented. These include safe transportation from border crossings, registration of hosts, GBV prevention and response measures in transit centres, and vetting of volunteers to improve the safe delivery of services for refugees and others displaced from Ukraine. There is also a need to make sure that these are accessible and safe to those with disabilities, individuals that identify as SOGIESC and minority groups, such as Roma populations.
- **Implement safeguarding, especially SEA prevention measures, targeting groups that are more likely to adopt negative coping mechanisms to cover increased living costs in the 2022-2023 winter:** young women, older persons, persons with disabilities, persons with chronic diseases, SOGIESC and Roma (Refugee Coordination Forum in Moldova, 2022b).
- **Ensure safe spaces for SOGIESC people:** support staff that are providing assistance to address any concerns of SOGIESC people, especially as it relates to safeguarding and SEA. This can be done through training on how to identify protection risks and use respectful terminology and communication, and ensuring confidentiality is firmly in place and respected.

⁷ Spaces which provide psychosocial support, dignity kits, and information on sexual and reproductive health services.

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