



Regional Refugee Response  
for the Ukraine Situation



# VULNERABILITY TO TRAFFICKING IN PERSONS IN THE CONTEXT OF THE WAR IN UKRAINE

Findings from Poland and Romania

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# ABBREVIATIONS

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<b>ATTF</b>	Anti-Trafficking Task Force
<b>DTM NIS</b>	Displacement Tracking Matrix: Needs and Intentions Survey
<b>EUAA</b>	European Union Agency for Asylum
<b>IDP</b>	Internally Displaced Person
<b>IOM</b>	International Organization for Migration
<b>NGO</b>	Non-Governmental Organization
<b>TCN</b>	Third-Country National
<b>TPD</b>	Temporary Protection Directive
<b>UNHCR</b>	United Nations High Commissioner for Refugees
<b>UNODC</b>	United Nations Office on Drugs and Crime

# INTRODUCTION

## DISPLACEMENT AND VULNERABILITY IN THE UKRAINE CRISIS

The war in Ukraine has heightened socio-economic vulnerabilities for millions of Ukrainian and third-country nationals (TCNs) residing in the country, amplifying risks on an unparalleled scale and leading to unprecedented levels of displacement within Ukraine and across its borders. According to the United Nations High Commissioner for Refugees (UNHCR), there were 6,554,800 Ukrainian refugees worldwide as of June 2024, including 5,996,500 residing in Europe and 558,300 hosted by other countries (UNHCR, 2023a).<sup>1</sup> The majority of those who have fled the country since February 2022 are women and children. The displacement crisis continues not only outside, but also within Ukraine: as of April 2024, IOM estimates that 3,548,000 de facto internally displaced persons (IDPs) and 4,734,000 returnees reside in Ukraine (IOM, 2024:1; see also UNHCR, 2024a).<sup>2</sup> The United Nations Office for the Coordination of Human-

itarian Affairs (OCHA) estimates that up to 14.6 million people in Ukraine (approximately 40 per cent of the population living in Ukraine) will need humanitarian assistance in 2024 (OCHA, 2023:4)

The displacement crisis was particularly severe in the first months after the large-scale invasion in February 2022. As of October 2022, more than 7.7 million refugees from Ukraine were recorded across Europe and more than 6.2 million were estimated to be displaced within Ukraine (UNHCR, 2022a:1). Since then, the number of Ukrainian refugees in Europe has declined, with the “signs of permanent returns having taken place back to Ukraine” (UNHCR, 2023b:2). In addition, the number of short-term temporary visits back to Ukraine has also been increasing, prompting UNHCR to raise concerns about the impact of such “pendular” travel to Ukraine on refugees’ legal status and continued access to rights, support and protection mechanisms in host countries (UNHCR, 2023b). As the war and humanitarian crisis enters its third year, with a likelihood of becoming protracted,<sup>3</sup> significant numbers of refugees from Ukraine continue to be covered by various protection mechanisms

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1. See [Ukraine Refugee Situation: UNHCR Data Explanatory Note – 14 June 2023](#) for a clarification on how these statistics are compiled.
  2. Note that in this IOM report, “internally displaced persons” (IDPs) are defined as individuals who have been forced to flee or to leave their homes or who are staying outside their habitual residence in Ukraine due to the full-scale invasion in February 2022, regardless of whether they hold registered IDP status. The terms ‘return’ and ‘returnee’ are used without prejudice to status and refer to all people who have returned to their habitual residence after a period of displacement of minimum two weeks since February 2022, whether from abroad or from internal displacement within Ukraine. This definition excludes individuals who have come back to Ukraine from abroad, but who have not returned to their places of habitual residence in the country” (IOM, 2023b:11).
  3. There is no internationally agreed definition of “protracted refugee situations”. The UNHCR used the “crude measure of refugee populations of 25,000 persons or more who have been in exile for five or more years in developing countries”. See UNHCR, Protracted Refugee Situations, Executive Committee of the High Commissioner’s Programme, Standing Committee, 30th Meeting, UN Doc. EC/54/SC/CRP.14, 10 June 2004, p.2. Protracted refugee situations, including definitional issues, are further discussed in Chapter 5 of the UNHCR’s 2006 report [The State of The World’s Refugees 2006: Human Displacement in the New Millennium](#).

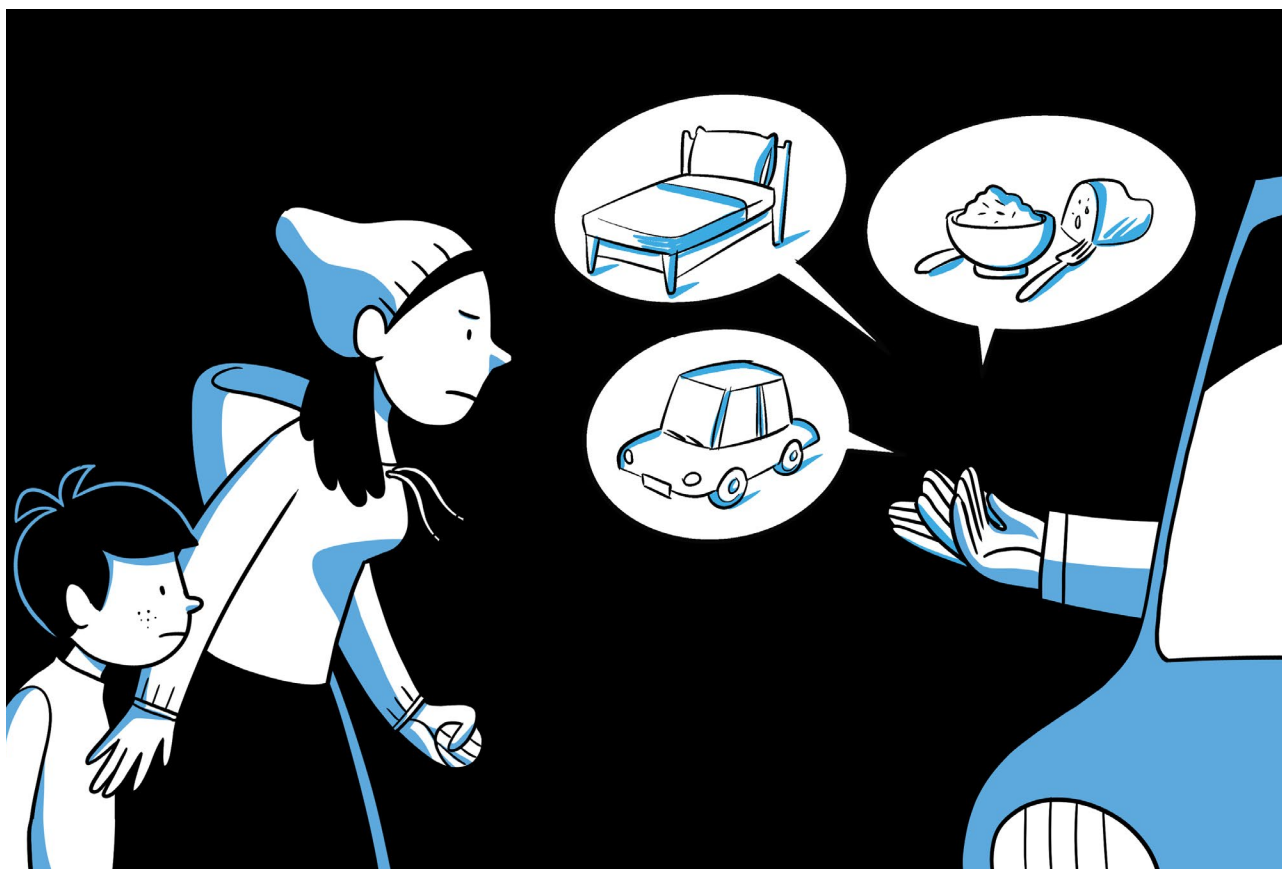
in their host countries. At the same time, some of the vulnerabilities initially associated with the emergency phase have been evolving into a complex set of structural issues. These issues are specific to the diverse political and socioeconomic contexts of the host countries and require equally complex evidence-based understanding, solutions and responses.

In March 2023, IOM and the Anti-Trafficking Task Force (ATTF)<sup>4</sup> published a research paper that examined the initial dynamics of human trafficking in the Ukraine crisis (IOM, 2023a).<sup>5</sup> This report (hereinafter ATTF Report 1) offered insights into the individual, situational and contextual vulnerabilities facing displaced persons within Ukraine and across its borders. Drawing upon interviews with key informants representing non-governmental and international organizations working on the issue of human trafficking in the context of Ukraine crisis, the ATTF Report 1 demonstrates that forced displacement remains one of the key factors and, at the same time, indicators of vulnerability of displaced populations, pushing individuals into situations and contexts where their rights may be compromised, and making them susceptible to exploitation, violence and abuse, including human trafficking. In the context of the ongoing humanitarian emergency, it is possible to obtain a quantitative estimate of displacement, especially in the context of cross-border movements, where exits and entries are recorded by national authorities. However, quantifying

the scale and nature of individual vulnerabilities before, during and after the journey (sometimes including a return journey back to Ukraine) remains a challenge. This makes the task of identifying individuals who may have experienced abuse, violence and exploitation, including human trafficking, or are at high risk of being trafficked, equally challenging. The plight of individuals displaced either within Ukraine or across its borders following the February 2022 invasion exemplifies such shifting landscapes of vulnerability, and significant methodological and practical challenges in understanding vulnerability and potential exposure to the crime of trafficking.

The ATTF Report 1 (IOM, 2023a) emphasized that despite limited data on the number of trafficked individuals, there is a need for greater attention, additional investigation and targeted intervention in response to the remaining and accumulating risks and vulnerabilities faced by refugees from Ukraine. This second report is based on a research project commissioned by IOM on behalf of the ATTF at the end of November 2023. It specifically examines the nature and prevalence of vulnerabilities that elevate the risks of becoming a victim of human trafficking among Ukrainian refugees in Poland and Romania.<sup>6</sup> This study focuses on Ukrainian refugees – that is, Ukrainian nationals who were forced to flee their homes following of the full-scale invasion in February 2022. It excludes third-country nationals who resided in Ukraine before the

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4. An Anti-Trafficking Task Force has been established under the auspices of the United Nations Protection Working Group, co-chaired by IOM and the United Nations Office on Drugs and Crime (UNODC). Its objectives include: (a) collecting and sharing data on trafficking risks among refugees; (b) supporting anti-trafficking efforts at the country and regional levels to assist host countries; and (c) providing operational recommendations to effectively identify, prevent and respond to trafficking incidents, prioritizing the rights of survivors and those at risk.
  5. In this report, the terms “human trafficking”, “trafficking in human beings” and “trafficking in persons” are used interchangeably, in accordance with the definition provided by the Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, which supplements the United Nations Convention against Transnational Organized Crime (Palermo Protocol, UNGA (2002)). This usage is without prejudice to other transnational or national definitions, including those provided by the Council of Europe Convention on Action against Trafficking in Human Beings (Council of Europe, 2005a), and the Directive 2011/36/EU of the European Parliament and of the Council of 5 April 2011 on preventing and combating trafficking in human beings and protecting its victims (European Union, 2011).
  6. This study focuses on Ukrainian refugees, or Ukrainian nationals who left Ukraine because of the full-scale invasion. It excludes third-country nationals who resided in Ukraine before the invasion and left after 24 February 2022. Additionally, it does not consider Ukrainian nationals who were residing in the two case-study countries prior to the invasion.



invasion and left after 24 February 2022. Additionally, it does not consider Ukrainian nationals who were residing in the two case-study countries prior to the invasion. In acknowledging significant methodological and conceptual limitations in estimating the prevalence of human trafficking among a specific population group and in a specific location, this report nevertheless presents one of the most comprehensive (at the time of writing) assessments of Ukrainian refugees' vulnerability to abuse, violence and exploitation, including human trafficking.

## INITIAL ASSESSMENT OF THE HUMAN TRAFFICKING DYNAMICS IN THE CONTEXT OF WAR IN UKRAINE

The ATTF Report 1 (IOM, 2023a) is based on a review of the existing literature on trafficking trends in the context of armed conflicts, and interviews with anti-trafficking practitioners and representatives of United Nations agencies, NGOs and international organizations involved in the anti-trafficking response in Ukraine and/or neighbouring countries. Drawing on the available evidence, the report suggests that despite the heightened risks and widespread concerns that the war would lead to a surge in trafficking, there has not been a significant increase in the number of Ukrainian nationals trafficked across or within European borders. It identifies several factors that helped alleviate trafficking risks, including:

A prompt and extensive protection response delivered by national and international stakeholders, including humanitarian agencies, NGOs, border forces and law enforcement agencies.

The European Union's rapid humanitarian response, including activation of the Temporary Protection Directive (TPD), which provided immediate protection from refoulement and access to rights, documentation and assistance for refugees, effectively reducing the immediate risks of human trafficking.

The continued functionality of State infrastructure in Ukraine, which played a role in preventing a significant increase in trafficking cases.

The resilience of State mechanisms, the adaptability of anti-trafficking programmes within Ukraine and across Europe, and a variety of awareness initiatives aimed at both Ukrainian refugees and frontline staff have been central to preventive actions. However, the report also identifies a range of risks and vulnerabilities impacting the everyday lives of Ukrainian refugees, including:

Severe socioeconomic stress, including the loss of employment and economic hardship, which increase susceptibility to human trafficking. The continuation of war and the protracted nature of

displacement are wearing out people's coping capacities, increasing their delayed vulnerability to trafficking.

Ongoing issues in relation to language barriers, labour market integration, access to social services and health care, and access to sustainable livelihood opportunities.

Social fragmentation resulting from family separations, which increases the vulnerability of individuals, especially children, to trafficking.

Vulnerabilities specific to certain groups, including unregistered refugees, children in institutional care, and individuals facing prolonged displacement and economic challenges.

The report concludes that enabling prompt access to regular mobility pathways (i.e. freedom of movement into and within the European Union) for Ukrainian refugees, and providing them with access to protection and assistance services, were key factors in mitigating the risk of human trafficking, which helped avert predictions of a human trafficking crisis. The report recommends monitoring and addressing both immediate and emerging vulnerabilities of Ukrainian refugees to ensure protection and support for all affected populations, particularly as the conflict and displacement continue.



# STUDY METHODOLOGY

## CHALLENGES IN MEASURING THE PREVALENCE OF HUMAN TRAFFICKING

The data on the number of identified human trafficking victims provided by national authorities are based on the officially identified cases of human trafficking. These statistics do not always reflect the true prevalence of human trafficking among the general population, which would more accurately reflect the full extent of the problem.<sup>7</sup> There is a broad consensus that anti-trafficking prevention and intervention efforts are often “hindered by a lack of information on the scope of the problem and its nuanced components” (Schroeder et al., 2022:46). Access to up-to-date and reliable data on both the prevalence of human trafficking and the shifting landscape of vulnerability at specific points in time is essential for planning and implementing effective identification and protection strategies by various stakeholders, including policymakers in host countries as well as at the European Union level, governmental and non-governmental service providers, law enforcement agencies and international organizations. However, estimating the prevalence of human trafficking itself, whether at a micro or macro level, presents significant conceptual, methodological and practical

challenges. De Vries and Dettmeijer-Vermeulen (2015:16–17) suggest that “There is no systematic methodology for estimating human trafficking prevalence in its entirety.” Commenting on the continuing attention and the allocation of significant resources towards anti-trafficking, Farrell and de Vries (2020:148) conclude that the true scale and nature of human trafficking at the local, national or global levels remain unknown.

As part of developing the methodology for this research, a literature review was completed to review available approaches to measuring the prevalence of human trafficking and associated challenges.<sup>8</sup> A summary of this review is provided in Appendix I. The review identified that measuring the prevalence of human trafficking would rely on two pivotal factors. The first is establishing definitive criteria to identify instances of trafficking (i.e. who and what are being counted?). The second is selecting the most appropriate method to collect and analyse the data related to these instances (i.e. how to count?). Identifying clear-cut responses to these questions remains problematic due to a range of ambiguities related to both the definition of human trafficking and its measurement techniques.

These conceptual and methodological complexities are reviewed and summarized in Appendix I, which concludes that there is currently no clear-cut solution to measuring

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7. The concept of prevalence is drawn from the field of epidemiology, where “Prevalence is a measure of the number or proportion of cases or events or conditions in a given population. Prevalence rates express the proportion of persons who have a particular disease or attribute at a specified point in time or over a specified period of time in a given population” (Page et al., 1995:86).
  8. A clear distinction should be drawn between the techniques used to measure something (i.e. to discover the exact size or amount of something) and to estimate something (i.e. to guess the cost, size, value, etc. of something). For an overview of methodologies employed in producing various indices of human trafficking, see, for example, Guth et al. (2014) or Gallagher (2017).

the prevalence of human trafficking. However, among the studies reviewed, there is a shared view that in-depth, local-level or “microlevel” research could provide more insights into the extent of trafficking and help shape appropriate responses. For example, Weitzer (2014) criticizes broad multi-country rankings and global indices for their disconnect with on-the-ground realities; he suggests that microlevel research can provide valuable insights about victims’ experiences. Barrick and Pfeffer’s (2021) extensive review of prevalence studies also highlights the advantages of focusing on specific industries, worker characteristics and geographic areas for determining the best sampling method. However, they also note the field’s current absence of a consistent strategy for designing both large- and small-scale prevalence studies that are practical and methodologically sound. Echoing this discussion, Dank (in White, 2020:22) emphasizes the potential benefits of pilot studies focusing on specific subpopulations within certain areas, at the same time acknowledging that they require considerable time and resources. As a solution, De Cock (in White, 2020:8) proposes a mixed-methods approach to prevalence estimation, which would incorporate and compare data from diverse tools and methodologies, including surveys, multiple systems estimation and statistical analysis, to understand how they might enhance each other. Farrell and de Vries (2020:158) call for a move towards localized research (acknowledging their time- and labour-intensive nature) to ensure direct engagement with targeted groups; they also suggest that digital spaces can be used as a new source of data. These considerations, together with practical constraints (including time and resource limitations) informed the development of the research methodology adopted for this study, as set out in the following section.

## ASSESSING THE FEASIBILITY OF RELYING ON PREVALENCE METHODOLOGIES

As indicated in the ATTF Report 1 and supported by data from European Union Member States hosting significant numbers of Ukrainian refugees, there has not been a notable increase in the number of identified or suspected trafficking victims among Ukrainian nationals and third-country nationals (TCNs), particularly in view of the massive scale of the internal and cross-border displacement. This can largely be attributed to the activation of the Temporary Protection Directive (TPD), which has played a crucial role in reducing vulnerabilities commonly associated with forced displacement by granting extensive rights to those fleeing the war in Ukraine, as well as the access of Ukrainian nationals to visa-free travel into and within the European Union. Given the relatively small known population size of individuals affected by human trafficking, and the conceptual and methodological challenges in measuring its prevalence, creating an adequate national-level sampling frame in this context is problematic.<sup>9</sup> As Di Nicola (2007:53) notes, a hidden population is difficult for researchers to access, as its members are neither easily identifiable nor found, making it impossible to define a sampling frame statistically. The rarity and hidden nature of human trafficking among Ukrainian refugees further complicates survey-based research due to the low incidence rate, requiring an impractically large sample size to yield statistically significant results. In addition to access, significant ethical concerns arise in conducting survey research on sensitive topics, requiring ethical safeguards such as referrals for assistance,

9. In social science research, a sampling frame refers to a list or an outline of the target population from which a sample is drawn. It serves as the basis for selecting participants or units for inclusion in the study. The sampling frame essentially defines the boundaries and characteristics of the population under study, providing researchers with a framework for selecting a representative sample.

ensuring confidentiality, obtaining informed consent and addressing potential psychological impacts.

The feasibility of employing a Multiple Systems Estimation (MSE) approach, which relies on existing secondary data from multiple sources (lists), is also compromised, given the minimal number of identified or presumed victims of trafficking. The limited entries on such lists preclude the use of MSE, as it relies on overlapping records to estimate the total population; with too few cases, this technique cannot produce a reliable estimate.

Time-Location Sampling and Network/Referral-based methods could be utilized to estimate the prevalence of human trafficking in particular locations and industries, or for specific profiles of victims. However, these methods require considerable time to establish referral systems, recruit participants with network connections (in contexts where victims of trafficking tend to be isolated, unlike some other hidden populations),<sup>10</sup> or pinpoint specific locations. Additionally, their effectiveness may be compromised by the currently low number of confirmed or suspected cases of human trafficking.

## METHODOLOGICAL APPROACH, COUNTRY SELECTION AND RESEARCH QUESTIONS

With methodological, logistical and practical limitations in mind, the adopted methodology included two pillars and focused on two countries – Poland and Romania.

**Country selection:** Unlike the ATTF Report 1, which took a broad view of trafficking in persons in the context of the war in Ukraine, this report is specific to two countries, Poland and Romania. The country selection was based on a combination of practical and logistical considerations. Both countries were among the top 10 countries in the European Union to grant temporary protection to non-European Union citizens who fled Ukraine as of November 2023,<sup>11</sup> with 955,110 non-European Union citizens covered by temporary protection in Poland (ranked as second in the list after Germany, with 1,235,960 TP grants) and 144,295 grants in Romania (ranked as seventh) (Eurostat, 2024b). In addition to the criteria of hosting substantial numbers of refugees from Ukraine, these two countries were selected because of their involvement in the IOM's ongoing Displacement Tracking Matrix (DTM) programme, which seeks to understand where affected people are, their most urgent needs and their intentions for the coming period.<sup>12</sup> This allowed the

10. An example of a hidden population that is not isolated and tends to be more networked is the community of individuals who use illegal drugs. Unlike victims of human trafficking, who are often isolated by their traffickers to prevent escape or discovery by authorities, individuals who use illegal drugs frequently form networks that can be critical for survival and coping with the challenges of everyday life, including evading law enforcement and finding support among peers.

11. Excluding the Netherlands, for which the data were not available.

12. Since the start of the war in Ukraine in February 2022, IOM has worked to provide direct assistance to affected populations, but has also provided a better understanding of these individuals' situations, aiming at improving and consolidating the crisis response efforts undertaken by IOM, governments and the international community. IOM's DTM programme seeks to understand where affected people are, their most urgent needs and their intentions for the coming period. IOM has conducted surveys across Ukraine and the region, providing crucial insights to inform evidence-based humanitarian actions and policy. Inside Ukraine, IOM has implemented consecutive rounds of representative general population surveys since March 2022, tracking internal displacement and mobility flows. Furthermore, IOM has conducted a number of studies in countries neighbouring Ukraine – Belarus, Hungary, Republic of Moldova, Poland, Romania and Slovakia – to survey the needs and intentions of those fleeing from the war and those crossing

inclusion of the counter-trafficking module of questions (“CT Module – Abuse, violence and exploitation”) as part of the December 2023 round of the DTM surveys deployed with refugees from Ukraine in the two countries.

The research methodology included two distinct, but interrelated pillars.

**Pillar 1** relied on a survey module dedicated specifically to indicators of abuse, violence and exploitation, which was integrated into the ongoing DTM “Needs and Intention Survey with refugees from Ukraine”. Although the DTM survey deployed in Romania and Poland in the reference period is based on non-probability convenience sampling, it offers a viable means of recording self-identified individual experiences of abuse, violence and exploitation that may intersect with trafficking in human beings. This module consists of questions about individual experiences of abuse, violence and exploitation; these questions are included in Appendix III. Additionally, the module included a “Prevalence Question” where respondents could indicate if someone they knew had been identified as a victim of human trafficking by competent authorities, including an option to self-identify as a victim.

**Pillar 2** relied on semi-structured qualitative interviews and consultations with key informants in the two case-study countries. Participants included law enforcement agencies, anti-trafficking coordination bodies, anti-trafficking NGOs and in-country IOM staff working directly with Ukrainian refugees. The initial interview schedule, slightly modified depending on whether the interviewee represented a government organization, a

non-governmental organization, or was an in-country IOM staff member, is included in Appendix IV.

This approach allowed answering the following three **Research Questions (RQs)**:

**RQ1:** What is the extent of vulnerability to human trafficking among Ukrainian refugees in Poland and Romania?

**RQ2:** How does vulnerability to human trafficking vary across the socio-economic dimensions recorded by the DTM survey?

**RQ3:** What is the rate of self-reported experiences of human trafficking among survey participants or individuals known to them?

**Clarification on the scope:** Similar to the ATTF Report 1, this report does not aim to gather independent data or obtain independent figures regarding cases of trafficking or other types of exploitation. Nor does it attempt to verify existing data. It does not address issues such as conscription, disappearances, or similar matters. As noted above, this study focuses on Ukrainian refugees, or Ukrainian nationals who left Ukraine because of the full-scale invasion. It excludes third-country nationals who resided in Ukraine before the invasion and left after 24 February 2022.

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back to Ukraine. In addition to this, IOM has enlarged the scope of the DTM tool to assess the situation concerning Ukrainian refugees and third-country nationals (TCNs) that continued their onwards journey and reached further destinations in Europe: Czechia, the Baltics, Western Balkans as well as Belgium, Germany and France. For further details, see: <https://dtm.iom.int/responses/ukraine-response>; <https://dtm.iom.int/romania>; and <https://dtm.iom.int/poland>. See also <https://dtm.iom.int/node/26346>. This dashboard presents the profiles and conditions of respondents in Poland, Romania and other countries. Dashboard filters allow users to check the profiles of respondents during the covered period. This dashboard will help readers understand more about the respondents' profiles in this specific survey.

Additionally, it does not consider Ukrainian nationals who were residing in the two case-study countries prior to the invasion.

**DTM methodology:** The Needs and Intention Survey with refugees from Ukraine is a quantitative survey conducted with Ukrainian nationals and TCNs who have fled Ukraine, are either settled or transiting through the country of the interview, and who have not participated in any other needs and intentions survey in the previous three months. Data collection began in March 2022 in countries neighbouring Ukraine. Since then, DTM has conducted 40,030 interviews of this kind in 2022, and 28,712 interviews in 2023 across several European countries, including Belarus, Bulgaria, Czechia, Estonia, Hungary, Latvia, Lithuania, the Republic of Moldova, Poland, Romania, Slovakia and Türkiye. The survey only targets adults (aged 18 years and above).

In Poland and Romania, DTM enumerators covered various locations in selected geographical areas, including transport hubs, information points, collective centres, reception centres, hotels, malls, public locations and so on. The selection of places to be covered by the data collection was made considering available resources and access granted to IOM's DTM staff to different areas and types of locations. DTM enumerators were trained on the content of the questionnaire, Kobo software use, data protection, child protection safeguards and referral mechanisms for vulnerable cases. DTM enumerators applied a non-random convenience sampling procedure in each of the selected locations for the data collection, selecting individuals who are part of the target population and give their consent to be interviewed proceeding with the remaining questions. The interviews are voluntary and anonymous and conducted one-on-one with respondents, in safe and isolated spaces as far as possible. Individuals

can decline to respond to single questions or to interrupt the interview if they wish to do so. If enumerators come across respondents who request further support, they refer these cases to the relevant protection actors. Surveys are conducted in Ukrainian, Russian or English, and interview data are entered into IOM's Kobo server using the KoboToolbox application. The data-cleaning routine includes time checks, outlier checks, logic checks, and identification of duplicate and identical surveys. DTM enumerators are monitored by field officers daily. Initial data analysis is performed with R (for the automatic generation of frequency tables per survey country) and Excel. Country and regional level reports and interactive products are available on the Ukraine Response page of the DTM Portal.<sup>13</sup>

**DTM survey respondent profiles:** A total of 787 respondents took part in the survey, with 204 surveyed in Poland and 583 in Romania. Respondents were excluded from subsequent analyses if they reported to have left Ukraine for reasons other than war ( $n = 29$ ) or if they were not Ukrainian citizens ( $n = 3$ ). The final sample size used in all analyses was  $n = 755$ .

Respondents' ages ranged from 18 to 85 years of age, with an average age of 40.86 ( $SD = 13.47$ ) and most of them were women (83%). Men were marginally more likely to be younger ( $M = 38.90$ ,  $SD = 13.95$ ) than women ( $M = 41.26$ ,  $SD = 13.35$ ),  $t(753) = -1.81$ ,  $p = 0.071$ . A majority of respondents were married/in partnership (69%) and travelled with children (64%).

**Key informant interviews (KIIs):** In addition to the DTM survey collection, a series of semi-structured KIIs were conducted with three groups of respondents in both Romania and Poland, including: (a) representatives of government agencies; (b) representatives of NGOs that provide direct support to victims of human trafficking; and (c) members of

13. See <https://dtm.iom.int/responses/ukraine-response> and the dashboard on the [Needs, Intention and Integration Challenges](#) results for 2023.

the in-country IOM teams that work directly with Ukrainian refugees, including DTM survey enumerators who helped facilitate the November and December data collection rounds that included the counter-trafficking module. A list of organizations is provided in Appendix V.

These interviews aimed to explore informants' views on the extent of vulnerability to human trafficking among Ukrainian refugees in these countries, examining vulnerability factors at individual, situational and structural levels. Another objective was to discuss the prevalence of human trafficking among Ukrainian refugees by speaking directly with stakeholders involved in national anti-trafficking activities and gathering their views on the dynamics of trafficking and potential changes in its prevalence.

Interviews were conducted during periods of fieldwork in Romania (27–29 November 2023, Bucharest, Isaccea, Galați; 9 interviewees, all in-person) and Poland (18–20 December 2023, Warsaw and Krakow; 6 interviewees, 5 in-person, 1 via videoconferencing facility). Some interviews with representatives of government agencies could not be recorded due to the agencies' security protocols, in which case handwritten notes were taken and later converted into printed notes; all other interviews were audio-recorded.

All interviews were transcribed and, where needed, translated into English. Interview transcripts were anonymised and uploaded into ATLAS.ti – a qualitative analysis software application – for qualitative analysis. The content of the interviews was analysed to identify key codes and themes. This process involved iterative reading of the interview transcripts to identify significant statements or excerpts that represent specific ideas or

concepts (codes), and then categorizing these codes into broader themes that capture the essence of the data.

**Ethical considerations:** Prior to data collection, DTM enumerators were trained on a range of issues, including safely managing incident disclosures. Enumerators may receive disclosures, as they are often in field locations where other aid workers are not present, and they must be ready to manage disclosures without putting survivors or themselves or other colleagues at risk of harm. Further, all IOM personnel, including DTM enumerators, are obliged to prevent and report sexual exploitation and abuse. As the DTM enumerators are not themselves protection experts, they were trained on their own roles and responsibilities, what they should and should not do in case of a disclosure, how to refer persons in need of assistance, and how to report sexual exploitation and abuse.

Standard ethical protocols guided all key informant interviews. Interviewees received a list of discussion topics in advance, along with a study information sheet that explained the purpose of the study and outlined data protection protocols. They were also provided with a copy of the informed consent form, which set out key ethical considerations, including anonymity and confidentiality, the right to withdraw from the study or to refrain from answering any questions, and the procedures for data processing. The informed consent process included information on the specific uses of the data, who will have access to them, publication and dissemination of the results, and how the participants' identities will be protected or anonymised in publications. Participants had an opportunity to ask questions before, during and after the interview. All interview records were fully anonymised as soon as possible after the interview, typically at the point of converting audio recordings and written notes into text.

# TRAFFICKING STATISTICS AND REFUGEE PROTECTION FRAMEWORKS FOR UKRAINIAN NATIONALS IN POLAND AND ROMANIA

## STATISTICS ON IDENTIFIED VICTIMS OF TRAFFICKING OF UKRAINIAN NATIONALITY (AS OF FEBRUARY 2024)

At the time of the publication of ATTF Report 1, few statistical data were available on the prevalence of trafficking among Ukrainian refugees hosted by European Union countries. This situation has not changed substantially as of February 2024, when this report was prepared.

In January 2024, Eurostat released an update on the number of victims of human trafficking identified in the European Union in 2022. According to this update, “In 2022, the number of registered victims of trafficking in human beings in the EU was 10,093, reflecting an

increase of 41.1% compared with the previous year and the highest recorded value in the period 2008–2022” (Eurostat, 2024a). The update explains the increase in the number of victims at the European Union level by referencing a number of factors: the increasing attention of authorities and agencies to anti-trafficking activities; substantial increases in absolute terms for some Member States, including Germany, where the increase is linked to “an important case in the field of forced labour exploitation”; and Italy, where the source of the data shifted from police data to the data provided by the protection system. The update does not make any references to the war in Ukraine in explaining the recorded increase. The [table 1](#) summarizes the statistics on the number of human trafficking victims identified in Poland and Romania, the two case study countries for this research.<sup>14</sup>

14. The following caveat needs to be taken into account when considering the officially reported data on human trafficking: first, there is a significant degree of variation in how national authorities define and identify victims, making data comparability challenging (for further discussion, see Van Dijk and Campistol, 2018). Second, data dependent on official identification processes can be limited for several reasons. Survivors may choose not to enter official systems due to distrust of authorities, having their needs met through other means, or being unaware they have been trafficked or of the official reporting mechanisms available. Additionally, the threshold levels for identification can be high, often relying on strict criminal definitions and standards for what constitutes a “victim”.

**Table 1: Victims of trafficking in human beings by citizenship as recorded by competent authorities in Romania and Poland in 2022 (based on the Eurostat dataset)**

	Nationality of the identified victims			Total number of identified victims
	EU27 countries excluding reporting country	Non-EU27 countries	Reporting country	
<b>Poland</b>	2	180	95	<b>277</b>
<b>Romania</b>	0	2	498	<b>500</b>

Source: Eurostat, [Victims of trafficking in human beings by citizenship](#).

## DATA ON THE PREVALENCE OF HUMAN TRAFFICKING AMONG UKRAINIAN REFUGEES IN POLAND

The Eurostat Annual Report on Migration and Asylum 2022, released in June 2023, provides data submitted by national authorities, focusing specifically on the number of victims of trafficking in human beings from third countries (Eurostat and EMN, 2023). In 2022, Poland reported 180 victims, with the majority trafficked for labour exploitation (179), followed by “other forms” (19) and sexual exploitation (8);<sup>15</sup> the top three countries of victims’ citizenship were Colombia (44), Venezuela (37) and Guatemala (35) (Eurostat and EMN, 2023:26).

In its Human Trafficking Report 2022, the Ministry of the Interior and Administration of Poland (MIARP, 2023) acknowledged that “increased migration entails the risk of human trafficking crime”. The report states that “31 alleged victims of human trafficking were identified” by the police in 2022, including 9 citizens of Ukraine (MIARP, 2023:20). In addition, “110 potential victims of human trafficking were identified” by the Border Guard, including 1 Ukrainian national (MIARP, 2023:23). The National Public Prosecutor’s

Office also provided “the number of victims of the crime of human trafficking in 2022”, which was 277 people, including 17 adults from Ukraine (MIARP, 2023:26). In the same year, the National Intervention and Consultation Centre for victims of human trafficking assisted 254 people, including 14 persons from Ukraine (MIARP, 2023:29). The report does not clearly set out whether the victims accounted for by each agency are distinct individuals or if there is an overlap, whereby some individuals may have received assistance and been reported by more than one agency; therefore, these figures cannot be added up, as this may lead to the counting some victims multiple times.

At the time of writing this report, no official data have been released on the number of victims of human trafficking identified in 2023. The October 2023 Joint Protection Analysis update, issued by UNHCR and focusing on Poland, indicates that “refugees from Ukraine are considered at heightened risk of being exposed to different forms of trafficking”; however, it also notes that “... the relevant authorities have recorded a rather limited number of cases disclosed and involving Ukrainian survivors”; it attributes the low number of disclosed trafficking cases to “some existing barriers in referral mechanisms, including lack of trust in the response services available and/or limited knowledge of where one should seek assistance” (UNHCR, 2023c:16–17).

15. The report notes that “more than one form of exploitation may be associated with each victim” (Eurostat and EMN, 2023:27); this means that several victims among the reported 180 experienced more than one form of exploitation.



## DATA ON THE PREVALENCE OF HUMAN TRAFFICKING AMONG UKRAINIAN REFUGEES IN ROMANIA

The Eurostat Annual Report on Migration and Asylum 2022 provides no data for Romania on the number of victims of trafficking who were third-country nationals, with a clarification that “Statistics are not available for or were not provided by Denmark and Romania” (Eurostat and EMN, 2023:27). The dataset released by the Romanian Agency against Trafficking in Persons (ANITP) on the number of victims of trafficking identified in 2022 indicates that the two non-EU27 victims of trafficking identified in 2022 were from the United States of America and the Republic of Moldova (ANITP, 2023).<sup>16</sup> At the time of writing this report, no official data were available on the number of victims of human trafficking identified in 2023.<sup>17</sup>

## CONTEXT: IMMEDIATE RESPONSE AND ACTIVATION OF TEMPORARY PROTECTION

In 2022, the European Union’s Temporary Protection Directive (TPD) 2001/55/EC (Council of the European Union, 2001) was activated for the first time since its adoption in 2001, as part of the European Union’s coordinated response to the crisis in Ukraine and providing a common protection framework for those fleeing the war. On 4 March 2022, the Council

Implementing Decision 2022/382 (Council of the European Union, 2022) established temporary protection for Ukrainian nationals, stateless individuals and TCNs residing in Ukraine on or before 24 February 2022, including their family members. The Directive did not automatically grant protection to Ukrainians or TCNs who had been displaced from Ukraine before 24 February 2022, or who had found themselves outside Ukraine due to work, study, holidays, family, or medical reasons before that date. However, the European Commission, in its Operational Guidelines for the implementation of the TPD regime, strongly encouraged “Member States to consider extending temporary protection in particular to those who fled Ukraine not long before 24 February 2022” (European Commission, 2022a). Furthermore, the European Union also adopted the 10 Point Action Plan for “stronger European coordination on welcoming those fleeing Ukraine” (European Commission, 2022b), as well as “A Common Anti-Trafficking Plan to address the risks of trafficking in human beings and support potential victims among those fleeing the war in Ukraine” (European Commission, 2022c).

The initial response to the crisis saw European Union States bordering Ukraine and Moldova, including Poland and Romania, opening their borders to refugees, including those without travel documents, for humanitarian reasons. Initial registration for temporary protection took place at border points, airports and registration centres, with police, border guards and immigration authorities playing a key role. The European Union and its Member States focused on providing suitable accommo-

16. The US TIP Report 2023 provided further insights into this situation, noting that while authorities identified two foreign victims (one in 2021), numerous unidentified foreign victims probably remained, particularly among asylum-seekers. For further details, see US Department of State (2023).

17. The new National Identification and Referral Mechanism (NIRM) for victims of trafficking has been adopted in Romania on 3 February 2023 through Government Decision 88/2023 (see <https://legislatie.just.ro/Public/DetaliiDocument/264575>, in Romanian). On 21 May 2024, the National Strategy against Trafficking in Persons for the period 2024-2028 was adopted, through Government Decision 533/2024 (see <https://legislatie.just.ro/Public/DetaliiDocument/283091>, in Romanian). According to the initial assessments, neither of these allocate a specific focus towards trafficking among refugees or the identification of refugees who may have been victims of human trafficking.

ation and housing assistance, establishing temporary shelters in reception centres, hotels and private homes, often in cooperation with NGOs. The European Commission's "Safe Homes" initiative and subsequent funding aimed to support private housing initiatives. The establishment of the Solidarity Platform "Ukraine" in March 2022 facilitated coordination and cooperation across European Union Member States, Schengen Associated Countries, and other relevant authorities and international organizations.

The rights for beneficiaries of temporary protection included: a residence permit for the entire duration of the protection; access to employment, subject to rules applicable to the professions and to national labour market policies and general conditions of employment; access to suitable accommodation or housing; access to social welfare or means of subsistence if necessary; access to medical care; access to education for persons under 18 years within the State education system; and other rights.<sup>18</sup> European Union Member States implemented a range of measures to ensure access to these rights, with many establishing one-stop-shop service points to streamline access to services. Recognizing the mental trauma experienced by refugees, access to mental health care and psychological support was a priority across many European Union countries. Additional efforts were made to integrate refugees into national labour markets through targeted upskilling, reskilling and language training.<sup>19</sup> By the end of 2022, all Member States had implemented the TPD.<sup>20</sup> However, the European Union Fundamental Rights Agency, in its 2023 Fundamental Rights Report, suggested that the extent to which

minimum rights had been enforced varied across Europe and that several implementation challenges persisted (FRA, 2023).

The European Union Agency for Asylum provides regularly updated country-specific information on the implementation of temporary protection in the European Union and associated countries ("EU+").<sup>21</sup> This includes a review of access to information tools, national legal frameworks, overall structure, procedural steps, reception and accommodation, and rights (including access to the labour market, medical care, education, social welfare and assistance to persons with special needs).

Owing to the volume and dynamic nature of such country-specific information, replicating it in the current report would be redundant. However, for the purposes of this report, a number of limitations or "conditionalities" in the implementation of the temporary protection regime in both Poland and Romania can be identified. These conditionalities can be classified into four groups: one-time access; time-restricted (where access to a specific benefit is withdrawn after a certain period); activity-related (where access to a specific benefit is contingent upon engaging in a certain type of activity, usually related to employment); or status-related (where access to a specific benefit is limited to individuals with a particular status or registration, such as persons with disabilities, pregnant women, children, or individuals above a certain age). As of 23 January 2024 (the most recent update at the time of writing this report), a number of conditionalities apply both in Poland and Romania, which, in combination with other factors, may potentially impact the vulnerability of Ukrainian refugees to abuse, violence and exploitation.

18. See [https://home-affairs.ec.europa.eu/policies/migration-and-asylum/common-european-asylum-system/temporary-protection\\_en](https://home-affairs.ec.europa.eu/policies/migration-and-asylum/common-european-asylum-system/temporary-protection_en).

19. For further information, see the Annual Report on Migration and Asylum 2022 issued by the European Migration Network (2023).

20. For an overview of national developments in the implementation of the Temporary Protection Directive (one year after its activation) see <https://euaa.europa.eu/publications/providing-temporary-protection-displaced-persons-ukraine-year-review>.

21. See <https://whoiswho.euaa.europa.eu/temporary-protection>.

## CURRENT STATE PROTECTION REGIME IN POLAND<sup>22</sup>

In Poland, different protection mechanisms apply to Ukrainian nationals and to TCNs who qualify as displaced persons under Article 2(1) and (2) of the Council Implementing Decision. Ukrainian citizens and their family members are covered by the Special Act of 12 March 2022 on “Assistance to Ukrainian Nationals in Connection with the Armed Conflict on the Territory of Ukraine” (Sejm of the Republic of Poland, 2022); while TCNs may apply for protection under a separate piece of legislation – the Act on “Granting Protection to Foreigners within the Territory of the Republic of Poland” (Sejm of the Republic of Poland, 2003). These two regimes provide similar, but distinct protection mechanisms, with reduced levels of support and assistance available to TCNs and elevated levels of “conditionality” expected of them. Some of the key conditionalities applicable to Ukrainian nationals (covered by the Special Act) include:

**Access to accommodation:** Free accommodation access is time-restricted and status-based: beneficiaries have free access for the first 120 days. After this period, if the beneficiary is PESEL-registered,<sup>23</sup> and if their temporary protection status is not deactivated as a consequence of pendular movement, local authorities cover 50 per cent of the costs (with a daily limit of PLN 40). After 180 days, the beneficiary must cover 75 per cent of the costs. These co-payment provisions do not apply to vulnerable groups, including persons with disabilities, pregnant women, senior beneficiaries and children (under the age of 18 years). A key requirement for non-exempt

groups is to have a source of income (either savings or income from employment or self-employment) to cover additional costs that kick in after 120 days.

**Labour market access:** Beneficiaries of temporary protection do not need a work permit to access the labour market. Business activities can be conducted upon obtaining a PESEL number.

**Health-care access:** Access to free public health care is granted on the same conditions as for Polish citizens, except for medical treatment abroad or spa procedures. Additionally, the Special Act identifies that beneficiaries of temporary protection “may be provided with free psychological assistance, provided by the head of the municipality, mayor of the town or city, competent for the place of residence of the Ukrainian citizen” (Sejm of the Republic of Poland, 2022: Section 10)

**Access to social welfare support:** The Special Act sets out a range of “rights to benefits”, as outlined in Section 10 (Sejm of the Republic of Poland, 2022). Access to some of these benefits is one-time, such as a “single cash benefit of PLN 300” that is specific to Ukrainian citizens benefiting from temporary protection. Access to other benefits is similar to status- or activity-based conditionalities for Polish citizens, including, for example, “subsidies to reduce the parent’s fee for the stay of the child in a day nursery, children’s club, or with a day carer”, which are regulated by the provisions of the Act on the Care of Children (of 4 February 2011).

22. The explanation of the protection regime (as of January 2024) is based on a review of publicly available documents and policies. It does not purport to provide a comprehensive review of all relevant materials. For additional information, also see UNHCR (2022c).

23. According to the Special Act, Ukrainian nationals who crossed the Polish border after the Russian invasion can apply for PESEL (Polish National Identification Number). PESEL entitles its holder to use the public health-care system and receive vaccinations, use family allowance and aid for refugees, open a bank account, enrol a child in a school and conduct business activity. PESEL is a tax ID for natural persons. See Deloitte (2022).

**Additional benefits:** In addition to benefits provided by the State, further benefits were available through various auxiliary protection mechanisms, including the UNHCR Cash Programme. UNHCR payments were conditional upon the assessment of protection needs (covering families with children, pregnant women, persons with disabilities) and economic vulnerability (i.e. having no source of income that could cover basic needs).<sup>24</sup> However, as of January 2024, this programme was terminated and new applications were no longer accepted.<sup>25</sup>

The current protection regime outlined above, as of January 2024, may leave a Ukrainian refugee who has attained the status of a temporary protection beneficiary in Poland (by registering and obtaining a PESEL number), and who is of working age, with no disability and no children, without substantive means of support or accommodation after 120 days unless they can rely on personal savings or find viable employment opportunities. This creates a reliance on finding viable employment opportunities, which presents significant challenges and increases the risk associated with the employment-based conditionality of accessing welfare support.<sup>26</sup>

A 2023 report issued by the European Agency for Fundamental Rights focused on the barriers to employment of Ukrainian refugees (Eurofound and FRA, 2023). The report, based on a survey of more than 14,000 people who had fled Ukraine as a result of war, concluded that “Despite efforts by the EU and its Member States to facilitate the labour market inclusion of people displaced from Ukraine, many of those who have sought jobs have faced multiple employment barriers since

their arrival” (Eurofound and FRA, 2023:9). The most significant barriers included lack of sufficient language knowledge, inability to secure regular employment opportunities, uncertainty about where to seek employment, difficulty in getting qualifications issued in Ukraine recognized by national authorities, excessive bureaucracy and experiencing discrimination. In the context of displacement, the lack of employment opportunities, coupled with the absence of steady and consistent welfare support (without considering other negative influences and barriers), is likely to contribute towards increasing vulnerabilities across the refugee population. UNHCR’s Regional Refugee Protection Plan for 2023 identified increasing vulnerabilities (as of 2022) for “women, children, older people, and people with disabilities” in Poland who relied on social protection assistance and accommodation in collective shelters. The report highlights that in some cases, barriers to meaningful inclusion and gainful livelihood were reported to trigger returns to Ukraine (UNHCR, 2023d:180).

## CURRENT STATE PROTECTION REGIME IN ROMANIA<sup>27</sup>

In Romania, eligibility for temporary protection is regulated by Government Decision No. 367/2022, amended by Government Decision No. 1077/2022, which grants temporary protection to Ukrainian nationals and non-Ukrainian third-country nationals (Government of Romania, 2023). Additional pieces of legislation determine the scope of assistance within the context of temporary

24. As of January 2024, “UNHCR assisted 327,821 refugees through its cash programme in 2022–23” (UNHCR, 2024c).

25. See <https://help.unhcr.org/poland/information-for-new-arrivals-from-ukraine/>.

26. See also UNHCR Comments and Observations on the Draft Law amending the Act on Assistance to Citizens of Ukraine in the Context of Armed Conflict in Ukraine (“the Special Act”) (UNHCR, 2024d) issued in April 2024 in response to a range of changes proposed, including, inter alia, changes to access to social protection, access to accommodation and long-term housing, and mandatory education for refugee children.

27. The explanation of the current (as of January 2024) protection regime is based on the review of publicly available documents and policies. It does not purport to provide a comprehensive review of all relevant materials.

protection, including Law No. 122/2006 on asylum in Romania and Government Emergency Ordinances (GEO) Nos. 15/2022, 20/2022 and 22/2023 concerning support and humanitarian assistance provided to those fleeing the armed conflict in Ukraine (Government of Romania, 2023). Additionally, the National Action Plan was adopted on 30 June 2022 through the Emergency Ordinance No. 100/2022 Regarding the Approval and Implementation of the National Plan of Measures Regarding the Protection and Inclusion of Displaced Persons from Ukraine, Beneficiaries of Temporary Protection in Romania, as well as for the Modification and Completion of Some Normative Acts.<sup>28</sup>

According to GEO 100/2022, Romania's response to the displacement crisis linked with the full-scale invasion of Ukraine in February 2022 was structured on two levels of intervention: primary response for emergency assistance and secondary response for medium- and long-term protection measures. The primary response consisted of the emergency response and intervention provided by Romania for displaced persons from Ukraine through GEO 15/2022. The secondary response refers to the protection mechanism developed to ensure medium- and long-term protection and inclusion measures for displaced persons from Ukraine who choose to live in Romania, including modifications of GEO 15/2022 through GEO 20/2022, GEO 28/2022 and GEO 22/2023, which implemented financial support for accommodation and integration.

Through the transposition of the Temporary Protection Directive (European Commission Directive 2001/55/EC) directly into Law 122/2006 on Asylum, as well as the methodological norms and adjacent legal instruments, beneficiaries of temporary protection in Romania are entitled to all the rights mentioned in Article 133 of Law 122/2006,

under the same conditions as Romanian citizens and legal residents. Moreover, GEO 100/2022 expressly outlines the measures to be taken, and the public authorities and institutions responsible for implementing these measures, to ensure that beneficiaries of temporary protection are able to enjoy their rights in Romania.

A new housing and subsistence policy was introduced in May 2023, replacing the "50/20" Programme, which provided Romanian citizens hosting Ukrainian refugees with RON 50 per person per day for accommodation and RON 20 per person per day for food. This change marks a shift from the earlier approach aimed at supporting the basic needs of refugees. An evaluation of the 50/20 programme, conducted by the UNHCR in 2022, identified high overall levels of satisfaction among Ukrainian refugees who took part in the survey. However, 36 per cent of respondents reported that they did not receive the food component of the programme, either as cash or in kind (UNHCR, 2022b:3). The new framework, effective as of May 2023, introduced both time-restricted, status-based and activity-related conditionalities. As summarized in the April 2023 Ukraine Refugee Situation Update, "In the first month, the assistance will be granted without any condition other than having Temporary Protection in Romania. However, for subsequent three months it will be subject to registration for employment through the national employment agency (ANOFM) and enrolment of children in any of a variety of schools or educational programs. From the fifth month until the end of June 2024, refugees will be eligible to receive funds for accommodation expenses only if they are employed and the children are enrolled into schools. Elderly people (above 65 years), persons with disability, care givers of children (below two years), and care givers of children

28. See [National plan of measures on the protection of displaced persons from Ukraine](#).

with disability (below three years) have been exempted from employment and/or school enrolment requirements” (UNHCR, 2023e).

The implementation of the new framework has created a situation where Ukrainian refugees (excluding those exempted as listed above) could face a complete withdrawal of all benefits shortly after their arrival in Romania. This increases the pressure on their ability to cope and heightens their economic vulnerability. Without alternative sustainable livelihood opportunities, this heightened vulnerability may increase the risk of abuse, violence and exploitation. As noted in the 2024 UNHCR report, “In 2024, refugees in Romania and new arrivals are expected to experience varying socioeconomic conditions and vulnerabilities” (UNHCR, 2024b:169). The same document also identifies human trafficking as one of the “potential protection risks facing new arrivals”.

## **POLAND AND ROMANIA: INCREASING CONDITIONALITY OF SUPPORT AND ASSISTANCE TO UKRAINIAN REFUGEES**

In the aftermath of the full-scale invasion of Ukraine in February 2022, immediate and robust levels of protection were extended to Ukrainian refugees by the European Union. However, in some countries, such protective measures have begun to diminish over time,

accompanied by an increase in conditionalities of access, particularly affecting refugees’ access to accommodation, employment and social welfare support. Such developments may further exacerbate the economic and social vulnerabilities of Ukrainian refugees, diminishing their capacity to cope in challenging circumstances. This vulnerability not only heightens their risk of abuse, violence and exploitation, but may also expose refugees to potential contexts of forced labour and human trafficking, underlining the urgency for sustained and comprehensive support mechanisms to safeguard the well-being and rights of displaced individuals.

The evolving protection regimes in both Poland and Romania reveal a trend towards diminishing socioeconomic support and accelerating conditionalities, which may, over time, pose significant challenges to the resilience and security of Ukrainian refugees. The introduction of stricter requirements for accessing benefits, along with the phasing out of assistance programmes by humanitarian agencies, could leave many vulnerable individuals without adequate support networks. Despite significant levels of support that were put in place by national governments and which remain available (with various modifications and increasing conditionalities of access as noted above), the precarious socioeconomic conditions facing refugees in these countries, as highlighted by UNHCR, heighten their vulnerability to various forms of exploitation and abuse.

# ASSESSING VULNERABILITY TO HUMAN TRAFFICKING AMONG UKRAINIAN REFUGEES IN POLAND AND ROMANIA

International instruments, including the United Nations Trafficking Protocol (UNGA, 2000) and regional instruments like the European Union Anti-Trafficking Directive (European Union, 2011) and the Council of Europe Convention on Action against Trafficking in Human Beings 2005 (Council of Europe, 2005a), highlight vulnerability as a crucial dimension in understanding and combating human trafficking. The UNODC's Issue Paper on "abuse of a position of vulnerability" (UNODC, 2013:13) – a concept embedded within the Protocol's definition of human trafficking – defines vulnerability as "those inherent, environmental, or contextual factors that increase the susceptibility of an individual or group to being trafficked". In other words, vulnerability encompasses the inherent characteristics of individuals, specific situations and contexts that facilitate exploitation, and the availability and variability of national measures for protection and prevention in response to trafficking. An Issue Brief titled "Addressing Vulnerability to Trafficking in Persons" (ICAT, 2022), developed by the United Nation's Inter-Agency Coordination Group against Trafficking in Persons (ICAT), reiterates this understanding of vulnerability, associating it with individual characteristics and situations that, in specific contexts, significantly increase the risk or threat of trafficking. It is crucial to note, however, that while these interactions of vulnerability dimensions significantly heighten the risk, they do not automatically result in human trafficking.

Within the Council of Europe Convention on Action against Trafficking in Human Beings, the concept of vulnerability appears in Article

4 (which relates to definitions), Article 5 (on prevention), and Article 12 (on assistance to victims). The explanatory report states: "By abuse of a position of vulnerability is meant abuse of any situation in which the person involved has no real and acceptable alternative to submitting to the abuse. The vulnerability may be of any kind, whether physical, psychological, emotional, family-related, social, or economic. The situation might, for example, involve insecurity or irregularity of the victim's administrative status, economic dependence, or fragile health. In short, the situation can be any state of hardship in which a human being is impelled to accept being exploited. Persons abusing such a situation flagrantly infringe human rights and violate human dignity and integrity, which no one can validly renounce" (Council of Europe, 2005b:para. 83).

The primary aim of this research was to understand the extent and dynamics of vulnerabilities faced by Ukrainian refugees that may increase their risk of becoming victims of trafficking. This research evaluates the vulnerability of Ukrainian refugees in Poland and Romania to abuse, violence and exploitation based on Ukrainian refugees' responses to the IOM's DTM "Needs and Intentions Survey with refugees from Ukraine" (DTM NIS), and the views and perspectives of key informants interviewed as part of this project. This section examines the nature and scale of problems and challenges experienced by Ukrainian refugees currently residing in Poland and Romania since leaving Ukraine. It

also considers reports of abuse, violence and exploitation as shared by refugees and insights provided by key informants.

The main findings presented in the following sections are also corroborated by and consistent with complementary sources of information, including UNHCR’s multisectoral needs assessments, safety audits, and regional profiling and protection reports (see, for example, UNHCR, 2024e and UNHCR, 2024f).

### Problems and challenges experienced by Ukrainian refugees in Poland and Romania

A specific section of the DTM NIS asks respondents about problems and challenges they have encountered since leaving Ukraine.<sup>29</sup> It provides a list of seven challenges to choose from: robbery, lost or stolen documents, lack of shelter, health issues, financial difficulties (such as insufficient funds to purchase basic necessities), hunger, and attacks or threats by others. Additionally, respondents are asked to report any other problems and challenges not listed.

They are also asked to specify whether these challenges occurred in the country where the survey was conducted (i.e. Poland or Romania) or elsewhere.

The majority of respondents in both countries reported experiencing at least one challenge since leaving Ukraine: 57 per cent (n = 108 out of 190) in Poland and 51 per cent (n = 288 out of 565) in Romania. The most common challenges were related to health and finance, with approximately one third of respondents in both Poland and Romania indicating that they had encountered these issues since leaving Ukraine (see [Table 2](#)). Just over 10 per cent of respondents in Poland reported experiencing attacks or threats by others, while fewer than 10 per cent of respondents in both countries encountered each of the remaining problems. Most of these challenges occurred within Poland or Romania, rather than in other countries. The similarities in the experiences of refugees in Poland and Romania are notable.

**Table 2: Percentage of refugees who answered “yes” to any of the challenges, listed by destination country**

	Poland (n = 190)		Romania (n = 565)	
	Yes (%)	Proportion of which were in the reporting country (%)	Yes (%)	Proportion of which were in the reporting country (%)
Health problems	32.1	83.6	34.9	98.0
Financial problems	32.6	91.9	30.1	97.1
Other	11.6	81.8	11.0	95.2
Attacks/threats	10.5	80.0	3.5	100.0
No shelter/place to sleep	6.8	92.3	7.1	90.0
Robbery	3.7	85.7	4.4	100.0
Lost/stolen Documents	3.2	100.0	1.1	100.0
Hunger	1.1	100.0	2.1	91.7

29. Hereinafter, the term “respondents” in the context of the DTM NIS survey refers to Ukrainian refugees (i.e. Ukrainian nationals) who identified themselves as having left Ukraine following the full-scale invasion of Ukraine in February 2022.



Overall, a substantial number of respondents reported experiencing no challenges in either country - 43 per cent in Poland and 49 per cent in Romania. However, as reported above, the majority reported facing at least one challenge since leaving Ukraine, with some individuals reporting up to five different challenges (see [Table 3](#) for a distribution of responses).

**Table 3: Number of challenges experienced by Ukrainian refugees in Poland and Romania respectively**

Number of problems	Poland (n = 190)		Romania (n = 565)	
	n	%	n	%
0	81	42.6	274	48.5
1	52	27.4	135	23.9
2	36	18.9	96	17.0
3	15	7.9	40	7.1
4	6	3.2	15	2.7
5	0	0.0	5	0.9

In cases where respondents reported experiencing at least one challenge, a cluster analysis was conducted to understand better the distribution of these challenges. This analysis helps identify groups or clusters of respondents that are more likely to share certain experiences and less likely to share others. Three main clusters were identified, providing a meaningful representation of the respondents' reported challenges. The similarity of the cluster solutions between Poland and Romania allowed for the combination of the two samples for more comprehensive insights.<sup>30</sup>

The first and largest cluster comprises 48 per cent of all respondents (n = 342 out of 755) and includes respondents who reported facing no challenges since leaving Ukraine, answering “no” to all questions. In the second

cluster, which accounts for 39 per cent of all respondents (n = 277 out of 755), 77 per cent reported financial challenges alongside at least one other issue, mostly commonly health, but possibly one of the other listed challenges. Similarly, 52 per cent in this cluster reported health issues and at least one other challenge. A smaller proportion within this cluster reported various other challenges: 30 per cent indicated “other” challenges, 17 per cent mentioned lack of shelter, 13 per cent reported attacks, 11 per cent experienced robbery, 4 per cent faced hunger and 3 per cent lost documents. The third and smallest cluster, accounting for 14 per cent of all respondents (n = 99 out of 755), includes those who reported only health-related challenges.

The findings of the DTM NIS, based on the views and experiences reported by Ukrainian refugees participating in this survey, align with assessments provided by representatives of anti-trafficking NGOs, IOM in-country staff, and government officials interviewed for this research. The majority of key informants agreed that not all Ukrainian refugees face significant problems or should be considered inherently vulnerable. This aligns with the DTM NIS finding that 48 per cent of all respondents in the survey reported facing no challenges since leaving Ukraine. One of the interviewees discussed multiple “faces” of displacement from Ukraine:



**KII QUOTE: Many refugees who came are not the refugees we think about, as poor people with bad clothes. Some people started to open businesses...they decided to stay. They immerse themselves in the local culture, go to museums, exhibitions. So, it's one face of this displacement . And the second face is a person, a woman with children who never**

30. This analysis excludes all those participants who “preferred not to answer” (“pnta”) to any one of the challenges questions.

**worked; they come from villages. And they must cross two thresholds. For them, it's like moving from a small village to a big city, Kyiv or whatever, which would be a huge challenge. And the next challenge? Yes, adding language barriers, cultural barriers in a new country, etc., etc., makes the whole thing even more difficult. And they are vulnerable.**

Representatives of anti-trafficking NGOs agreed that vulnerabilities of Ukrainian refugees may be exploited by traffickers, often using subtle methods rather than “trapping” victims at the border. They also mentioned that it might take traffickers more time to understand and exploit these vulnerabilities, which may help explain why the initial fears of almost immediate trafficking at the border did not materialize.



**KII QUOTE: The expectations of people who work in the anti-trafficking sector are quite different from the expectations of non-specialized actors. For us, it was very clear that traffickers would not go to the border and take people at the border, as all newspapers initially reported. This is not their modus operandi; they work with subtle tools, instruments and methods. Usually, they wait until they know the person, exploit their vulnerabilities, and then they act. Our expectation is that the numbers will increase from now on in the neighbouring countries.**

Representatives from NGOs noted the unhelpful and misleading media portrayal of human trafficking, particularly in the early stages following the full-scale invasion of Ukraine when an unprecedented number of women and children were fleeing the country. They observed that such misrepresentation and the overemphasis on the risks around trafficking for sexual exploitation, rather than other forms of exploitation such as labour and

domestic servitude, led, in some instances, to misinformation, which may have diverted attention away from the actual risks and vulnerabilities faced by refugees.



**KII QUOTE: Major newspapers came to Romania, and they started writing about the risks of trafficking at the border. I think it was BBC, The Guardian, all these international big actors. We were on Telegram groups with Ukrainian women who were planning to come to Romania. And these women said, “We are not coming because there are traffickers at the border!” This is because everybody was writing about the fact that traffickers were waiting for them at the border with Romania. That was stupid. You cannot do that because these people are so scared, and probably the alternative was even scarier for them. They wanted to come to Romania, and they had a safe pathway here, but they decided to go to Poland – which is like three times more in terms of travelling because of something that people wrote who did not know exactly what they were talking about and were sensationalizing the subject. Journalists from all major newspapers in the world were coming here. People who had never written about Romania, never written about trafficking, and they were like, “Can you put us in contact with a victim?” It did a lot of harm because authorities were looking at those press releases and big stories, and they were expecting huge numbers. The journalists wouldn't know all the technical issues that you need to investigate, and there are three elements; you need to gather evidence for every element in order for a case to be tried as human trafficking.**

Having identified financial problems as one of the key challenges, more than a quarter of DTM NIS respondents in both countries reported that their average income was insuf-

ficient to cover monthly expenses: 27 per cent (n = 52 out of 190) in Poland and 29 per cent (n = 162 out of 565) in Romania. Furthermore, financial support was identified as the most critical need by respondents in both countries: 43 per cent (n = 82 out of 190) in Poland and a striking 77 per cent (n = 433 out of 565) in Romania highlighted it as a priority. NGO representatives and IOM staff also noted that Ukrainian refugees encounter significant financial challenges due to limited employment opportunities and stringent conditions for accessing financial support, particularly regarding housing and living expenses. These challenges are compounded by reductions in the duration and amount of financial support, exacerbating the economic vulnerability of refugees who had limited or no alternative financial resources.

Representatives of government organizations in both countries shared the view that the economic difficulties faced by some Ukrainian refugees contribute to their vulnerability. They noted a potential for emerging or increasing vulnerabilities in the future owing to changes in the provision of financial support and benefits, as well as changes to or the discontinuation of the temporary protection regime. Some government officials noted that such changes might heighten the risk of exploitation and trafficking as refugees, whose coping capacities may have already been stretched, search for other means to support themselves. In this context, they highlighted the importance of enabling Ukrainian refugees to sustain their livelihoods through employment opportunities, education and language support as crucial measures to mitigate the risk of trafficking.

Representatives from NGOs and IOM in-country staff identified that, alongside financial difficulties, access to health care was a significant obstacle, especially for older persons and persons with disabilities. They

noted that the complexity of local health-care systems, including multistage referral processes, compounded by language barriers, contributed to these challenges. Among the DTM NIS respondents who answered a specific question about experiencing obstacles in accessing health care, 54 per cent of respondents in Poland (n = 36 out of 78) reported experiencing obstacles, and 60 per cent (n = 133 out of 336) reported similar issues in Romania. The top three obstacles frequently reported in Romania were the cost of health care, language barriers and long queues. In Poland, the top three reported difficulties were long queues, language barriers and the cost of health care. Access to medicines and health care was identified as among the top priority needs in both Poland (16%, n = 31 out of 190; and 27%, n = 52 out of 190, respectively) and Romania (21%, n = 116 out of 565; and 49%, n = 278 out of 565, respectively).



**KII QUOTE: I spoke to a woman who lives in [name of the town] with her husband. They are over 70 years old or even over 80 years old...They live in a shelter and have been trying to get hearing aids for about a year and a half...Why can't they get hearing aids for two years? Because, first of all, it is very difficult for them to make an appointment with the ear doctor, because the appointment is just a window every six months. And when they come to the ear doctor, the doctor tells them that "I don't understand your Ukrainian. Learn Polish, come back." I mean, how is this even possible? How can people get this help?...[the woman eventually got the appointment with the help of external organization and the doctor said] yes, you need hearing aids for both ears. PLN 1,450 for one device.<sup>31</sup> That's PLN 2,900 PLN.<sup>32</sup>**

31. About USD 370 when converted using the rate of USD 1 = PLN 3.92 as of 1 January 2024, as provided by [www.xe.com](http://www.xe.com), see [Currency Table: PLN – Polish Zloty](#).

32. About USD 740, see previous footnote.

And the woman says, “I don’t have that kind of money.” And they say, “If you have the money, come back.” And she said, “My husband didn’t even go to the doctor after that, because what’s the point? There is no money...there is nowhere to wait for help.”

Several respondents in the DTM NIS survey reported having experienced lack of access to housing/shelter or having nowhere to sleep since they left Ukraine (6.8% in Poland and 7.1% in Romania, see Table 2 above). When asked to identify their main needs, 16 per cent (n = 122 out of 755) stated that access to long-term accommodation was a priority for themselves or their family members at the time of the interview. Representatives from NGOs and IOM in-country staff also acknowledged that securing affordable, stable and safe housing was a substantial challenge for Ukrainian refugees. According to our interviewees, the increased demand for accommodation, particularly in areas near the Ukrainian border or in urban locations close to services and employment opportunities, led to inflated rental prices, making it difficult for refugees to find suitable accommodation. Furthermore, reports emerged of landlords refusing to rent to Ukrainian nationals, especially those with children. This discrimination, as noted by our interviewees, added another layer of vulnerability for these refugees:



**KII QUOTE: Just recently, I was chatting to a woman who was looking for a flat. She works as a manicurist, earns well, works in a well-known salon, has everything in order, and it’s a stable job with a regular income. She has a grown-up child, a 15-year-old girl. Some Ukrainians are rejected the moment landlords hear the Ukrainian accent. Some**

**drop out when they realize she is from Ukraine, not by her accent, but by asking the question directly. And some drop out when they find out she has a child. She says, “I just can’t get it into my head, 15 years old, what’s the problem?” This is also very strange, but it’s not only her who told me about this; they just don’t want to rent to Ukrainians with children. And with pets too, by the way.**

## EXPERIENCES OF ABUSE, VIOLENCE AND EXPLOITATION BY UKRAINIAN REFUGEES IN POLAND AND ROMANIA

The November and December 2023 rounds of the DTM NIS in Poland and Romania included an additional module of questions titled “CT Module – Abuse, Violence and Exploitation”. This module asked whether respondents had encountered specific forms of abuse, violence and exploitation, often associated with trafficking in human beings.<sup>33</sup> It is important to note two significant caveats: first, various lists of human trafficking indicators have been developed by national authorities and international organizations, such as the “Human Trafficking Indicators” by the United Nations Office on Drugs and Crime (UNODC, 2013), “Operational Indicators of Trafficking in Human Beings” published by the ILO (2009), or “Indicators of Trafficking in persons” by IOM (IOM, n.d.). The list of questions included in the DTM NIS module does not encompass all these indicators. These questions were specifically formulated taking into account the constraints of a face-to-face survey, where only a limited number of questions could be asked due to time limitations, participant and

33. A range of relevant assessments is also being conducted by UNHCR in relation to the situation of Ukrainian refugees in these countries and the region, including gender-based violence safety audits and regional protection monitoring reports. These can be accessed via the UNHCR [Operational Data Portal](#).

interviewer fatigue, and adherence to the “no harm” principle. Second, the inclusion of these questions was not aimed at identifying victims of human trafficking among the survey participants, but rather at assessing the presence of self-reported experiences of violence, abuse and exploitation that may occur within the context of a large-scale displacement and may amount to trafficking in human beings. A copy of the module is included in Appendix II.

Overall, only a minority of respondents reported experiencing abuse, violence or exploitation since leaving Ukraine – 13 per cent (n = 25 out of 190) in Poland and 7 per cent (n = 40 out of 565) in Romania. The vast majority of refugees interviewed in these surveys did not report any such experiences. **Table 4** provides a breakdown of the different types of abuse, violence and exploitation experiences, and the associated percentages of respondents who answered “yes” to the relevant questions.

**Table 4: Frequencies of “yes” responses to the nine questions on abuse, violence and exploitation**

	Poland (n = 190)					Romania (n = 565)				
	Yes		PNTA		location	Yes		PNTA		location
	n	%	n	%	POL (%)	n	%	n	%	ROM (%)
<b>Worked without getting the expected payment</b>	20	10.5	7.0	3.7	95.0	19	3.4	4.0	0.7	78.9
<b>Forced to perform work or other activities against one’s will</b>	2	1.1	8.0	4.2	100.0	2	0.4	1.0	0.2	100.0
<b>Offer of marriage (for yourself or a family member)</b>	5	2.6	8.0	4.2	60.0	8	1.4	0.0	0.0	87.5
<b>Kept at certain locations against one’s will (excluding authorities)</b>	0	0.0	7.0	3.7	n/a	1	0.2	0.0	0.0	100.0
<b>Experiencing any form of physical violence</b>	4	2.1	8.0	4.2	100.0	0	0.0	0.0	0.0	n/a
<b>Forced to travel/move onward to a new country/ location</b>	0	0.0	8.0	4.2	n/a	11	1.9	2.0	0.4	100.0
<b>Deceived, manipulated, indebted etc. to get one to travel/move</b>	2	1.1	7.0	3.7	50.0	19	3.4	1.0	0.2	94.7
<b>Did not always had travel documents (passport) with oneself</b>	1	0.5	10.0	5.3	0.0	0	0.0	3.0	0.5	n/a

Notes: PNTA = “prefer not to answer” responses; location (%) = the percentage of respondents who reported to have experienced the exploitation in the country where the survey was conducted (Poland, Romania).

In Poland, the most reported issue among respondents was working without receiving the expected payment, accounting for 10.5 per cent of the sample.<sup>34</sup> All other reported experiences were mentioned by fewer than 3 per cent of respondents. In Romania, the most frequently reported experiences were working without receiving the expected payment and being deceived into travelling, each cited by 3.4 per cent of respondents. All other types of experiences were reported by less than 2 per cent of the sample.

Respondents who reported not receiving the expected payment were asked about the job or activity for which they had not been paid. Among those who responded to this question (n = 32 out of 755), the majority indicated that they had not received the expected payment in jobs traditionally characterized by low wages and low skill requirements, including:

- Maid/Housekeeping/Cleaning: 6 (combining “a maid in a hotel”, “maid”, “cleaning” and “cleaning lady”)<sup>35</sup>
- Seasonal Work/Agriculture: 3 (combining “seasonal jobs”, “the work of the season” and “peaches were picked”)
- Transportation/Logistics: 5 (combining “transportation and storage”, “logistics manager”, “sailor”, “delivery of goods” and “driver”)
- Service Sector/Hospitality: 9 (combining “service industries”, “service sector”, “helper in the kitchen”, “waiter”, “cosmetology”, “translation”, “salesman in a store” and “warehouse work”)
- Administration/Management/Professional Services: 6 (combining “administration”, “export manager”, “recruitment of personnel”, “activity as a psychologist”, “psychology” and “education and art”)

- Production/Manufacturing/Building: 3 (combining “production”, “building/construction” and “sewing”)

Although a slightly higher proportion of respondents in Poland reported experiencing violence, abuse or exploitation compared with Romania, chi-square tests applied where feasible (i.e. where at least 5 “yes” responses were recorded in each country) indicate that these differences are either weak or statistically insignificant.

**Table 4** also presents the percentage of respondents who chose “prefer not to answer” in response to questions within this module. This option is included because it is reasonable to anticipate that some respondents might feel uncomfortable with these questions. It is possible that some may have encountered these issues, but felt shame or guilt, or simply regarded them as personal matters too difficult to disclose. This could theoretically lead to an underestimation of the “true” proportion of respondents who have encountered violence, abuse or exploitation. However, as noted in **Table 4** above, the percentages of “prefer not to answer” (PNTA) responses per question are relatively low, with only 11 respondents in Poland, equating to 6 per cent of the 190 respondents, and 4 respondents in Romania, or 0.7 per cent of the 565 respondents, selecting “prefer not to answer” to at least one question. In Poland, but not in Romania, these figures are higher than those who answered “yes” to the same questions.

These self-reported aspects of vulnerability to abuse, violence and exploitation highlight some of the broader findings that can be drawn from the overall DTM NIS survey responses (i.e. responses to questions beyond

34. Also see the Protection Brief Poland (January–March 2024) (UNHCR, 2024g), which highlights similar difficulties experienced by refugees from Ukraine in the labour market in Poland.

35. For further details on the exploitation of Ukrainian domestic workers in Poland, see Care (2023).

those in the “CT Module – Abuse, Violence and Exploitation”) and from the key informant interviews.

The initial question in the Counter-Trafficking Module focused on a specific negative work experience: working or performing activities without receiving the expected payment. However, this alone is not a definitive indicator of human trafficking within the context of work, and its presence does not necessarily confirm such a situation. For instance, other work-related indicators listed by UNODC (2013) include being compelled to work against one’s will, being unable to leave the work environment, suffering injuries or impairments typical of certain jobs, receiving little or no payment, and not having access to earnings, among others. While the presence of a single indicator may suggest the potential for human trafficking, it can only be confirmed by competent authorities after collecting appropriate evidence and conducting a thorough investigation. Nonetheless, experiencing any of these indicators can increase an individual’s vulnerability to human trafficking compared with those who have not encountered them.

As noted above, nearly 11 per cent (n = 20 out of 190) of respondents in Poland and over 3 per cent (n = 19 out of 565) in Romania reported having experienced situations where they worked or performed activities without receiving the expected payment. Only 4 out of 755 respondents answered positively to the question of whether they were forced to perform work or other activities against their will. In addition to these specific questions, the DTM NIS survey recorded further data related to respondents’ work experiences, highlighting their overall exposure to negative conditions that could potentially increase their vulnerability to human trafficking.

The DTM NIS survey includes a module dedicated to work experiences, beginning with a question that asked respondents to confirm their current employment status. Among the 755 respondents, 3 per cent (n = 23) were

employed as “daily workers”, 29 per cent (n = 220) described themselves as “employed” and 4 per cent (n = 32) as “self-employed”. A significant proportion of respondents were not working due to retirement (13%, n = 101) or maternity/paternity leave (10%, n = 74); others were unemployed, including those actively looking for a job (19%, n = 143) and those not seeking employment (16%, n = 117).

All respondents were asked about experiencing any problems in their current job. A significant proportion found this question not applicable to their circumstances (40%, n = 304 out of 755), about 47 per cent reported not experiencing any problems (n = 355), and almost 2 per cent chose the “prefer not to answer” option (n = 14). Among the remaining 82 respondents, the most frequently reported issues were having to work long hours, working without a formal contract and being underpaid.

According to respondents from key informant interviews, some Ukrainian refugees encountered employment barriers such as language difficulties, unrecognized skills or education, and exploitative conditions, including being underpaid or receiving less than local employees for equivalent work. NGO representatives highlighted numerous cases where Ukrainian refugees worked without formal contracts, making them susceptible to exploitation and unable to assert their rights. This vulnerability was compounded by a lack of legal literacy and understanding of local laws.



**KII Quote: People usually get jobs in shops, to stack shelves, or work as cleaners – these are the two main types. They complain, of course, about inequality and being paid less. There is this opinion: Romanians are Romanians, and you [Ukrainians] are you. A lot of people work without rest breaks; they work long hours because there is no other**

option, so they do it. Of course, you can ask if you are happy with your work agreement or contract, but they say, “We signed up for it ourselves”, and they keep silent. They do not complain.



**KII Quote: One of the refugees we helped mentioned to me that he wanted to get a job. It was outside the city. When he arrived there, he was definitely working without any kind of contract. They lived in a very small room with about 8–10 beds, and he worked there for a few days. But the work was really hard. He was not able to take rest breaks and they were constantly being told to keep working. So, he said he wanted to leave the job and return to the shelter. He was not paid for the days he worked. When he left, he had no idea where he was. They were not caged or anything like that; he was free to go any time he wanted. But he was not aware of where he was – he had heard it was close to the city. So again, it would not be a case of human trafficking, but a clear example of exploitation and exploitative conditions.**

Government representatives raised concerns about the potential for labour exploitation of Ukrainian refugees, especially in informal sectors. They also emphasized the importance of regular monitoring and enforcement of labour laws to protect vulnerable individuals.

In addition to the insights above, a range of other reports and studies examine aspects of vulnerabilities faced by Ukrainian refugees and, overall, corroborate and complement the findings presented in this report. For example, UNHCR’s Regional Profiling and Monitoring exercise regularly collects and analyses data about the profiles, protection risks and needs of refugees from Ukraine, monitoring changes

over time since October 2023.<sup>36</sup> The data cover refugee profiles (including individual and household characteristics, and specific needs), displacement patterns (including regions/oblasts of origin in Ukraine, departure dates from Ukraine, arrival dates to host countries and temporary visits to Ukraine), and access to rights (including identity documents, refugee or temporary protection status in the host country, access to work, education, social protection, accommodation, urgent needs and access to childcare). For example, a similar pattern of workplace challenges emerges as an outcome of regional profiling and monitoring: as of June 2024, based on information shared by 727 respondents in Romania and 3,759 respondents in Poland, 28 per cent of respondents in Romania and 27 per cent of respondents in Poland reported working excessively long hours. Additionally, 12 per cent of respondents worked without a formal employment contract in Romania and 19 per cent did so in Poland, while 1 per cent of respondents in both countries reported the confiscation of their documentation by their employer.

Furthermore, a series of safety assessments undertaken by UNHCR identified a range of risks of gender-based violence, sexual exploitation and abuse related to private and collective accommodation, livelihoods and service accessibility for persons fleeing Ukraine in 2023.<sup>37</sup>

In addition to the indicators of vulnerability included in the “CT Module – Abuse, Violence and Exploitation”, representatives of anti-trafficking NGOs and in-country IOM staff in Poland and Romania, who were interviewed as part of this project, identified several other factors that they believed could increase the vulnerability of Ukrainian refugees to violence, exploitation and abuse, including human

36. See [Protection Risks and Needs of Refugees from Ukraine](#).

37. See, for example, UNHCR (2023f).



trafficking. Gender, age, ethnicity and disability were mentioned as having significant influences on individual vulnerability.

**Gender:** According to a representative from an anti-trafficking NGO in Poland, women seeking insecure work (without a contract) and families in remote areas are particularly vulnerable to exploitation due to limited job opportunities and the withdrawal of benefits. Additionally, adolescents, especially girls, are at higher risk due to varying laws and cultural norms, making them susceptible to exploitative relationships and criminal activities. Legal literacy and cultural misunderstandings were highlighted as additional barriers that may impact individuals' vulnerability, according to respondents from non-governmental organizations and in-country IOM staff. They noted that a lack of legal literacy and understanding of the local culture and systems may leave some refugees vulnerable to exploitation and unable to assert their rights effectively. This includes challenges in navigating legal processes and understanding cultural norms. Moreover, refugees, particularly those under financial strain or those who lack language proficiency, may be unaware of where to seek assistance.

**Ethnicity:** In both Poland and Romania, Ukrainian Roma refugees faced significant discrimination and difficulties in accessing essential services, further increasing their risk of exploitation and trafficking:



**KII Quote:** So for a Roma to get an apartment from a landlord in Bucharest or in other cities, it's almost impossible because of racism. I would not see people renting apartments to Roma, so even if they have the money, I don't think they would be able to actually rent an apartment. They are staying in public centres, and there are large families. They have compounded vulnerabilities due to usually having a high number of children and fewer adults. In our experience, they manage

to find jobs around the centre, for example, in the flower shop or the local market. But I think their main vulnerability is linked to housing – if tomorrow all these centres close, I don't know where they would go because, in Romania, the Roma community is self-organized and they have their own communities, their own places. I'm not sure how the Roma community from Ukraine will manage... where would they literally go?



**KII Quote:** In relation to Roma... it's such a sore point because the discrimination is enormous, terrible, pervasive.

**Disability:** According to NGO representatives and in-country IOM staff, another group facing substantial difficulties includes persons with disabilities, who encounter considerable challenges in accessing welfare support, health-care services, mobility aids and devices, assistive technologies and other forms of support. These difficulties arise due to multiple barriers to having their disability recognized by competent national authorities, compounded by the absence of mechanisms for revalidating the disability status granted by Ukrainian authorities.



**KII Quote:** Support is provided on the condition that people have to go to work, and persons with disabilities need to prove their disability. This is the main problem, because confirming a disability in Romania is very difficult: language and financial barriers are the biggest challenges. Thus, it turns out that even disabled people get up and go to work. In Romania, the retirement age for women is higher [than in Ukraine], and Ukrainian pensioners, including those with disabilities, get up, go to shopping centres, and get jobs there as cleaners.



**KII Quote: It's a huge problem to obtain disability status. You must go through not just several, but dozens of steps and visit different doctors. These doctors only offer paid consultations; you can't get in for free otherwise. And people do not have the money to pay.**

**Older persons:** One of the interviewees, representing a non-governmental organization in Romania, provided an example demonstrating the vulnerability of older persons. This example references the new framework for providing State assistance to refugees from Ukraine in Romania, introduced in May 2023 and summarized in the section [Current State Protection Regime in Romania](#) above. According to this framework, support can be withdrawn after four months, unless the recipient meets one of the conditions linked to employment, age (above 65 years), disability, or caregiver status.



**KII Quote: I know people who have already gone through these four months. I personally live in a block of flats where accommodation is provided for Ukrainians. Last month, half the block was evicted because they are not employed. A lot of people! A grandmother who's 62, another who's 64 and a half – they no longer have the right to live here. But they also can't work. They are going back. One went back to Odessa, another to her village in Ukraine.**

**Ukrainian men evading conscription:** In discussing specific vulnerabilities in the context of displacement, the majority of interviewees mentioned that Ukrainian men evading military conscription often undertook dangerous land and river journeys crossing borders irregularly. However, there appeared to be limited understanding or awareness among most respondents regarding the specific challenges these men may face.<sup>38</sup>



**KII Quote: Ukrainian men swim across the river, and very often at the railway station you see them in diving suits. They put something on top, but you can still see these diving tights. They ask for food; they ask to be fed.**



**KII Quote: I heard from someone who's Ukrainian that it is possible to pay to cross the border. However, it's a problem because when this person arrives in Poland without a stamp in their passport, they cannot claim temporary protection, so they need to apply for refugee protection.**

**LGBTQ+:** Only one respondent provided a specific example related to the experiences of an LGBTQ+ refugee:



**KII Quote: I've heard about a trans woman from Ukraine who at that time did not have a gender recognition certificate. They were**

38. The recent suspension of consular services for Ukrainian military-age men without a military record by the Government of Ukraine may create additional barriers to accessing temporary protection, especially in situations where valid travel documents may be required for temporary protection registration. This measure (requirement of a valid travel document for confirmation of identity) is currently being considered as part of the Draft Law amending the Act on Assistance to Citizens of Ukraine in the Context of Armed Conflict in Ukraine in Poland. See, for example, [UNHCR Comments and Observations on the Draft Law amending the Act on Assistance to Citizens of Ukraine in the Context of Armed Conflict in Ukraine \("the Special Act"\)](#).

so desperate that they attempted to cross into Poland across the mountains and almost died. However, they were saved by Polish authorities and sent to the reception centre without being sent back to Ukraine. I do not know the extent of this problem.

When discussing the availability of specific policies to address the challenges faced by certain individuals or communities, a government representative in Romania noted that no such policies were in place.



**KII Quote:** We don't try to make vulnerability an ethnic issue or a sexual orientation issue, because we also had people saying, "Why don't you conduct more prevention campaigns for the Roma community?" I said, "It's not about the Roma community. It's about children, women and people who don't have opportunities; they are potential victims of trafficking." So, if we target a specific group of people, I think we're just perpetuating that segregation.

**Experiences of discrimination:** In addition to challenges faced by specific groups, key informants reported a rising tide of negative attitudes and discrimination towards Ukrainian refugees. This discrimination, both overt and subtle, was evident in reactions to language barriers and other prejudiced behaviours, which were perceived by informants as potentially impeding social integration and restricting access to essential services, including health care.



**KII Quote:** There are also many Romanian family doctors who simply do not want to take on Ukrainian patients.



**KII Quote:** Many people we speak to are not ready, and they do not consider it necessary to qualify the attitude towards them as discrimination. For example, a common response is, "Well, I wouldn't call it discrimination, but they shouted at me to go home." Among many people we talk to, discrimination is considered something out of the ordinary, such as when you are threatened or not given a place to live. More mundane cases, like those on the bus, in the supermarket, or in any other public place, are perceived differently; they seem trivial, as if some irrational person just happened to be there. It's a frequent situation. Generally, yes, many people share that they still face discrimination in employment, often in an overt form, such as "we have enough refugees, we don't need any more". Or in a covert form, where they set unrealistic requirements, like high language proficiency for low-skilled jobs that do not require communication.

A specific DTM NIS question asked respondents if they had experienced discrimination since their arrival. In Poland, 35 per cent (n = 66 out of 190) of respondents reported having experienced some form of discrimination; in Romania, 10 per cent (n = 57 out of 565) reported similar experiences. All respondents who answered positively to this question were asked to describe their experiences. Although only brief statements were recorded as part of the survey data collection, a sample of these summaries is provided below:

Quotes from the DTM NIS survey:



**When looking for an apartment, they did not want to rent to Ukrainians.**

**During the search for work and housing, Ukrainians were refused.**

**At school, children were bullied for their language.**

**At the doctor's appointment, the doctor said, "Why did you come here, no matter how much war there was, I wouldn't have left, you're stuck in a foreign country." It happened at the doctor's appointment after giving birth.**

**Bullying by children at school. When they worked for a cleaning company, all the girls from Ukraine were not paid for their work. Sometimes in transport, when we speak (among ourselves) in Ukrainian, they can say uncensored swear words in our direction.**

**At the previous job during the internship, I was the only Ukrainian woman, I felt disrespected, the team did not accept and did not accept me. In public transport, the woman heard the Ukrainian language and began to show with gestures that we do not belong here.**

**Child was bullied in school because she is Ukrainian.**

**Obscene remarks at the bus stop and in public transport about my origin.**

**Police did not react in any way to the fact that I was beaten, accepted the statement and then completely ignored me.**

**There were cases when they heard that we were from Ukraine, there was ridicule of children in the park by other children, there was also nervous irritation on the part of people when returning tickets at the railway station. The cashier refused to refund the money for the tickets until I called a Romanian friend and she spoke on the phone with the cashier.**

**The supermarket employee did not want to serve you, said to go learn the language and then we will serve you.**

The data collected through the DTM "Needs and Intentions Survey" and key informant interviews reveal that while not many Ukrainian refugees in Poland and Romania reported direct experiences of abuse, violence or exploitation, a significant number did report a range of socioeconomic challenges, including financial hardship, health issues, employment difficulties, housing insecurity and experiences of discrimination. The existing literature confirms a direct link between socioeconomic challenges and increased vulnerability to abuse, violence and exploitation – a view shared by most interviewees in this study. For example, refugees facing financial or housing difficulties may become increasingly at risk of entering exploitative situations by accepting unfavourable or exploitative work conditions, or by relying on less secure housing options as their coping capacities diminish. As the discussion above demonstrates, many vulnerabilities are not only interconnected, but are also dynamic. The following section explores the multidimensional concept of vulnerability to abuse, violence and exploitation, including human trafficking. It positions a range of vulnerabilities identified from the analysis of data generated via the DTM NIS and key informant interviews along a continuum of personal, situational and structural vulnerabilities. This section also relies on DTM NIS data to examine the relationship between indicators of personal and situational vulnerabilities and the likelihood of refugees encountering problems and challenges since leaving Ukraine, as well as the likelihood of experiencing abuse, violence and exploitation.

# ASSESSING THE IMPACT OF PERSONAL, SITUATIONAL AND CONTEXTUAL FACTORS ON VULNERABILITY TO HUMAN TRAFFICKING

## THEORETICAL MODELS OF VULNERABILITY

The ATTF Report 1 (IOM, 2023a) examined the initial dynamics of vulnerability to human trafficking in the context of displacement from Ukraine by relying on the specific multidimensional understanding of vulnerability to human trafficking developed by the United Nation's Inter-Agency Coordination Group against Trafficking in Persons (ICAT). This model describes vulnerability as “encompassing different factors: personal, situational and contextual, which interact and may increase the risk of trafficking for certain individuals, groups and/or communities” (ICAT, 2022:2–3). In addition to the ICAT model, several other frameworks have been developed to understand how vulnerability operates at different levels in the context of migration and human trafficking. For instance,

the UNODC's Guidance Note on “Abuse of a Position of Vulnerability” (UNODC, 2012) within the context of human trafficking distinguishes between personal, situational and circumstantial vulnerabilities of the alleged victim.<sup>39</sup> Meanwhile, the 2019 edition of the IOM Handbook on Protection and Assistance for Migrants Vulnerable to Violence, Exploitation and Abuse (IOM, 2019) addresses the absence of an internationally agreed definition of “vulnerable migrant” and the lack of procedures for identifying such migrants.<sup>40</sup> It also provides guidelines for their protection and assistance. The Handbook defines “a migrant vulnerable to violence, exploitation, or abuse” as “a migrant or group of migrants exposed to or with experience of violence, exploitation, or abuse within a migration context and with limited capability to avoid, resist, cope, or recover, as a result of the unique interaction of individual, household/family, community, and structural characteristics and conditions” (IOM, 2019:1).

39. The guidance note further clarifies that abuse of a position of vulnerability “occurs when an individual's personal, situational or circumstantial vulnerability is intentionally used or otherwise taken advantage of, to recruit, transport, transfer, harbour or receive that person for the purpose of exploiting him or her, such that the person believes that submitting to the will of the abuser is the only real or acceptable option available to him or her, and that belief is reasonable in light of the victim's situation” (UNODC, 2012:para. 2.5.)

40. The IOM Handbook focuses on the vulnerability of migrants (rather than clarifying the meaning of the concept of vulnerability as referred to by the definition of human trafficking in the Palermo Protocol). The IOM's “Determinants of Migrant Vulnerability Model” encompasses not only vulnerability, but also resilience; it considers “both resilience and vulnerability to be determined by the presence, absence and interaction of risk and protective factors at different levels: individual, household/family, community and structural. Each factor, at each level, is considered to be either a risk or a protective factor, depending on the context” (IOM, 2019:5).

Although these models, like any theoretical framework designed to capture the complexity of social life, have limitations in capturing the full diversity of individual circumstances, and do not take into account the specificity of displacement and refugee situations, they remain valuable tools for understanding complex social phenomena. No model can encompass every individual variation, yet they provide a foundation for systematic analysis and informed decision-making, helping researchers and practitioners in identifying patterns and relationships. On a practical level, the explanatory power of these models can be significantly enhanced through the integration of quantitative evidence. While ATTF Paper 1 did not employ individual-level quantitative methods, the current report complements and updates this work with a quantitative approach.

The ATTF Paper 1 (IOM, 2023a) considered three groups of vulnerability factors – personal, situational and contextual – that influence the vulnerability of Ukrainian refugees to abuse, violence and exploitation, including trafficking in human beings. Personal vulnerability factors are attributes inherent to each individual, including age, sex, gender (including gender identity/expression), disability, ethnicity and sexual orientation. These factors are intrinsically intertwined, meaning that one’s identity always encompasses a combination of these elements – for example, a person is not defined by age alone, but by a combination of their age, sex, gender and so on. The ATTF Paper 1 clarifies that “a personal characteristic should not be understood as a vulnerability in itself” (IOM, 2023a:11). It is the interplay between complex personal identities and external (situational or contextual) factors that may increase an individual’s vulnerability to human trafficking. Situational vulnerability refers to temporary challenges that adversely affect an individual’s condition in a specific time and context. Conversely, contextual vulnerability is linked to the impact of the

external environment and structural elements that negatively influence an individual’s circumstances.

This report aims to broaden the discussion by drawing on both quantitative and qualitative evidence collected during fieldwork in Poland and Romania. It highlights the dynamic and ongoing nature of vulnerability to human trafficking. The data reviewed in this report challenge the binary classification of individuals as either vulnerable or not vulnerable to human trafficking. Such a binary perspective fails to capture the complexity of the issue, as the same individual may be more susceptible to human trafficking under certain conditions than others. Although the situation of Ukrainian refugees in Europe now appears more “stable” than in the initial months following the invasion, the protracted nature of the war and displacement means that the factors influencing vulnerability to abuse, violence and exploitation, including human trafficking, are continuously evolving and require ongoing monitoring.

## CONTINUUM OF VULNERABILITY

The concept of vulnerability, encompassing personal, situational and contextual dimensions, does not fit neatly into a “vulnerable/not vulnerable” binary. Recognizing these aspects as intersecting and operating on a continuum of vulnerability offers a more nuanced understanding that accounts for the dynamic nature of everyone’s individual circumstances across all three dimensions. The “negative end” of the continuum represents the most adverse interaction of factors underpinning individual, situational and structural vulnerabilities; the “positive end” represents the most effective interaction of protective factors, which can be referred to as resilience, where refugees have the maximum capacity to “avoid, resist, cope with, or recover from violence, exploitation and abuse” (IOM, 2019:8). On this continuum,

an individual's level of vulnerability to human trafficking can either increase or decrease, reflecting the need for a dynamic approach to assessment and intervention.


The graphic representation of the vulnerability continuum on the following page (Figure 1) is based on the concept of vulnerability described above, which should be seen as a composite of interacting and intersecting personal, situational and contextual vulnerabilities. These vulnerabilities intersect on a continuum that ranges from maximum vulnerability (the extreme, negative end) to the absence or minimum level of vulnerability (the extreme, positive end). Each dimension of vulnerability includes a range of factors drawn from the analysis of qualitative and quantitative data collected in this research, particularly the key themes that emerged from analysing key informants' responses and their assessments of the vulnerability of Ukrainian refugees to human trafficking. However, these factors should not be considered definitive or exhaustive at each level of vulnerability. Although the main influences on the vulnerability of refugees to violence, exploitation and abuse can be identified, other influences can never be fully accounted for or factored into any model, including any statistical analysis testing the applicability and predictive power of such models.

Each dimension and each factor are depicted with two extremes: from the most negative to the most positive. For instance, access to health care for refugees (a primarily situational dimension that interacts with structural factors, including the availability of protection regimes at the national level) might range from being a risk factor (limited or no access

to medical care) contributing to refugees' vulnerability, to a protective factor (comprehensive, high-quality medical care that is easily accessible) contributing to refugees' resilience. In most cases, the situation is likely to fall somewhere between these two extremes.

Any factor not positioned at the extreme positive end of the continuum or close to it (when it acts as a protective factor contributing to refugees' resilience) should be considered a risk factor. The further it is from the positive, or "protective", end, the more it contributes to increasing vulnerability to abuse, violence and exploitation. Some risk factors have a more significant impact than others. For example, in many contexts, immigration or legal status – specifically being in an irregular situation or lacking documentation – significantly shifts an individual towards the negative end of the continuum for both personal and situational vulnerabilities. However, the impact of undocumented status can be mitigated by robust and human rights-centred anti-trafficking legislation and interventions that protect everyone, regardless of their immigration or legal status. Nevertheless, in the context of displacement from Ukraine and the activation of the TPD, this factor carries less weight for Ukrainian refugees who may have applied for and received their temporary protection status. Under these circumstances, other factors, such as the inability to access well-paid employment and the absence of savings, are likely to have a considerably greater impact than immigration or legal status. Similarly, a lack of awareness about human trafficking can be offset by an individual's economic security, access to welfare, and a robust policing and criminal justice system that effectively counters the criminal dimension of human trafficking.

**Figure 1: Continuums of vulnerability fo human trafficking model (based on factors identified by KII respondents)**



Dimension	Factor	Maximum vulnerability	Minimum vulnerability or absent
<b>Personal vulnerability</b>		Personal identities and circumstances: intersections of age, sex, gender, ability, disability, nationality, ethnicity, sexual identity, family status, health status, education, past or current experiences of encountering violence, exploitation or abuse (not directly related to human trafficking), including gender-based violence	
<b>Situational vulnerability (in the context of the refugee crisis)</b>	<b>Household and caring responsibilities</b>	Extensive, no access to support, multiple legal and social constraints	Access to robust support systems, flexibility, legal and social recognition
	<b>Nationality and legal status</b>	Not having access to territory to seek asylum/protection. Absence of documentation, irregular legal status, limited or no access to services, vulnerability to exploitation, threat of deportation	Refugee or other international protection status; full citizenship rights
	<b>Socioeconomic situation</b>	Insecure and impoverished: financial instability, lack of resources, unemployment	Stable and prosperous: financially secure, access to resources, employment (if/when needed)
	<b>Access to housing, food, clothing</b>	Limited or no access to housing, food, and clothing	Consistent access to affordable high-quality housing, food, and clothing
	<b>Health care</b>	Limited or no access to medical services, low-quality care	Comprehensive, high-quality medical care with easy access
	<b>Employment</b>	Forced labour and exploitation	Secure and fulfilling employment: stable and safe well-paying jobs
	<b>Local language skills and understanding of rights</b>	No language skills and lack of rights knowledge, no awareness of support mechanisms	Fluent (local) language proficiency and comprehensive awareness of rights, entitlements and support mechanisms
	<b>Situation in Ukraine</b>	Active conflict and unsafe: Ongoing war, dangerous and unstable conditions, unsafe for return	Peaceful and Safe: No conflict, stable and secure environment, safe for return
	<b>Other factors</b>		
<b>Contextual vulnerability</b>	<b>Current availability of law and policy protecting Ukrainian refugees</b>	Lack of recognition of international protection needs / treated (in law and policy) as undocumented / irregular migrants	Recognition of refugee or other international protection status, access to socioeconomic rights and freedom of movement
	<b>Implementation of law and policy</b>	Legal and policy commitments are not funded or sufficiently resourced; implementation not enforced or monitored	Implementation is fully funded at all levels (governmental, non-governmental), enforced and constantly monitored
	<b>Future changes to law and policy</b>	Restrictive and Exclusionary: withdrawal of rights and freedom of movement; forced return to Ukraine; refoulement	Progressive and Inclusive: Continued freedom of movement, enhanced rights and protections for Ukrainian refugees
	<b>Broader cultural factors</b>	Prevalence of hostility, discrimination, and racism	Acceptance, diversity embraced, and absence of discrimination or racism
	<b>Broader protection mechanisms</b>	Deficient and Fragmented Protection System: inefficient and corrupt law enforcement and an unjust criminal justice system, no legal aid	Robust and Multifaceted Protection System: effective law enforcement agencies, fair criminal justice system, accessible legal aid and advocacy
	<b>Human Trafficking</b>	Widespread human trafficking, high demand for services exploiting trafficked individuals, poor law enforcement and lack of effective anti-trafficking law and policy	Strict enforcement against human trafficking and exploitation at the national level, effective anti-trafficking law and policy, low demand for exploitative services
	<b>Other factors</b>		



Evaluating individual vulnerability to human trafficking on a continuum should prompt policymakers and practitioners to recognize that situations of human trafficking are possible even when an individual's vulnerabilities are not uniformly severe or immediately apparent, and that risk factors can interact in complex ways. By considering this continuum of vulnerabilities, interventions can be tailored to address the specific needs and risks faced by individuals at different points on this spectrum, rather than applying a one-size-fits-all approach. Understanding vulnerabilities as a continuum should also inform how risk and risk reduction are approached in policy and practice in the short, medium and long term. In the weeks following the full-scale invasion of Ukraine in February 2022, sensationalized reporting by various media outlets on the looming human trafficking crisis at the Ukrainian borders seemed to reinforce what has been described as a major misunderstanding about human trafficking, as summarized by De Haas (2023:357): that human trafficking "often only 'counts' if victims are abducted, beaten, chained, and locked up, or forced to do sex work against their will", while in reality, "...trafficking is not about abduction or sex work, but about the severe exploitation of vulnerable workers through deceit and coercion".

The anticipation of a trafficking crisis, which prompted numerous international organizations to issue warnings about the elevated risks of human trafficking, may also have established a specific perception of trafficking as a benchmark for measuring the severity of individual situations. Our interviewees mentioned a range of adverse situations increasingly faced by Ukrainian refugees in their daily lives. These included instances of alleged labour exploitation, such as withheld wages and being made to work long hours without rest breaks, alleged sexual abuse where sexual services were demanded by landlords in exchange for accommodation, alleged denial of basic health care due to

language barriers and capacity issues within national health-care systems, and bureaucratic complexities that severely hindered the recognition of disability status, a condition for accessing further support for those recognized as persons with disabilities. A rigid categorization that prioritizes trafficking cases while dismissing a broad array of other violations and challenges can create significant obstacles in addressing such rights violations and injustices, with profound effects on individuals' lives. Our interviewees also noted that when some of these cases were reported to national authorities, they might not have been taken seriously or may have been ignored. This neglect was attributed to a lack of resources in a system overwhelmed by the rising demand for protection services due to the surge in refugee numbers, or to discriminatory attitudes. At the policy level, this narrow perspective and strict division between human trafficking and various other vulnerability scenarios complicate the assessment and understanding of the nature and scale of these situations, thereby hindering the formulation of appropriate policy and practical responses.



**KII QUOTE:** For example, if someone threatened a refugee, or somebody stole their phone, and they [the refugees] go to the police to report it, the police say, "Okay, please come with a translator." But it is their [the police's] obligation to provide a translator or interpreter. And they just dismiss all such cases. We had a case where a child, 15 or 16 years old, had been beaten in front of the shelter by a local guy. They went to the police, did everything they could, went to the doctor to document everything and to start the procedure, and nothing has happened. So, a lot of cases are just ignored.



**KII QUOTE:** People from Ukraine are afraid to report local people who are using or exploiting them... It's a feeling of "gratitude". This feeling was very strong and even concerned sexual crimes. When the war started, it was considered not good to go to the police because of the local people who do a lot for Ukraine. You should feel "gratitude". You shouldn't report anyone to the police.



**KII QUOTE:** In theory, giving access to social benefits and all the support that Ukrainians have received, you would expect this to decrease vulnerabilities, and this is something we advocated for. The problem is that there were so many delays in receiving this aid. We have beneficiaries in our programmes who haven't received this financial aid for six months, so they are already in debt. They have taken different loans from various people, some of whom are shady. We have people who came to us and said that there are landlords who are starting to abuse them – physically and verbally.

## ASSESSING VULNERABILITY INDICATORS AND THEIR IMPACT ON UKRAINIAN REFUGEES' EXPERIENCES

Understanding vulnerability to violence, abuse and exploitation, including human trafficking, as a multidimensional phenomenon, facilitates the use of advanced statistical tools for quantitative assessments. This research utilizes data from the DTM NIS, viewing vulnerability through the dynamic interplay of personal, situational and contextual factors. It relied on IBM SPSS Statistics to develop and test six logistic regression models, exploring the relationship between vulnerability indicators and the experiences of Ukrainian refugees. Appendix II provides a summary of these models, including the methodology and results. It is important to note that these models are constrained by the available vulnerability indicators and the assumption that all predictors, such as age and gender, have equal predictive power (within the context of this specific model).

Additionally, while the model's findings can suggest trends and relationships within the studied sample, caution should be exercised when extrapolating these results to a broader population that does not share these similarities. This caution is necessary because logistic regression models are sensitive to the specific characteristics and distribution of the sample data. Furthermore, external factors not captured in the sample may influence outcomes differently in other populations.

The initial three models assessed the relationship between personal and situational vulnerability indicators – sourced from the DTM NIS – and the challenges Ukrainian refugees have experienced since leaving Ukraine. The analysis indicates that when personal and situational vulnerabilities are considered together, they account for some variance in the experiences of problems

and challenges within this specific sample of respondents. Key findings reveal that being older, single (widowed or divorced), financially insecure, and having experienced discrimination significantly increase the likelihood of encountering challenges. Notably, experiences of discrimination had the most substantial impact, making affected refugees substantially more likely to report difficulties. The second series of models analysed the relationship between personal and situational vulnerability indicators from the DTM NIS and refugees' self-reported experiences of abuse, violence and exploitation. Although only a small proportion of respondents reported such experiences, the analysis revealed that being younger, single (widowed or divorced), having multiple needs and experiencing discrimination increased the likelihood of encountering abuse, violence or exploitation. Discrimination had the most significant impact, making affected refugees substantially more likely to report negative experiences.

These findings, based on a specific sample and a selected set of personal and situational vulnerability indicators, are not generalizable to all refugees, but offer valuable insights for policymakers and protection services. While the impact of other vulnerability indicators, not included in this analysis, but depicted on the continuum diagram above, was not assessed, the results draw attention to specific groups of refugees who might have increased protection needs. This suggests the need for further research to explore and address these additional vulnerabilities comprehensively.

## SELF-REPORTED DATA ON HUMAN TRAFFICKING PREVALENCE: INSIGHTS FROM DTM NIS

All DTM NIS respondents were also asked to identify whether they personally knew anyone from Ukraine who had been identified as a victim of human trafficking by national authorities. This question allowed respondents to identify themselves as an officially identified victim.<sup>41</sup> In Poland, no respondents answered yes to this question. In Romania, four respondents answered positively; however, given the low number (less than 1% of 755 respondents) and that all four responses referred to “someone I do not personally know” rather than a family member, a friend, or the respondents themselves, this outcome should not be treated as statistically significant.

Our KII interviewees shared a similar assessment of the prevalence of human trafficking among Ukrainian refugees. Representatives of anti-trafficking NGOs commented on the low or zero numbers of identified victims from Ukraine, attributing this to the role of the temporary protection regime and the availability of anti-trafficking actors and mechanisms at the onset of the Ukrainian refugee influx across borders, which helped prevent large-scale human trafficking. However, they expressed concerns about whether official statistics accurately reflect the true scale of the problem. They highlighted a potential gap between the number of identified and presumed victims, and the actual number of refugees from Ukraine who may have been trafficked. In discussing this gap, the NGO representatives mentioned a lack of proactive case identification by the authorities and the expectation that victims would come forward to report their experiences. They also pointed

41. This question was initially introduced specifically for this study, piloted over a two-month period, and has not been utilized in any other DTM surveys to date.

to cases of misidentification, which could occur due to procedural and language barriers, making it challenging to recognize and assist victims officially. Furthermore, some NGO representatives mentioned the lack of institutional capacity for proactive anti-trafficking actions, noting that authorities may sometimes adopt a reactive rather than a proactive stance in identifying and preventing trafficking.

Government representatives suggested that the low number of reported cases indicated that the risk of trafficking was not as high as anticipated or that it was effectively mitigated. They also noted that identifying and addressing trafficking cases remained challenging due to the complexity of trafficking scenarios and the mobility of refugees.

In Romania, government representatives described how detailed contingency plans were implemented shortly after the February 2022 invasion, indicating a proactive and organized approach to the refugee crisis that aided early prevention and identification of potential trafficking cases. They also highlighted the impact of various registration processes for Ukrainian refugees, including border checks (all entries and exits were checked since Romania was not a Schengen member until 31 March 2024), the registration of unaccompanied children, and the registration of transporters/drivers and cars at some border checkpoints, which helped track movements and potentially reduce irregular movements and associated risks. Additionally, they mentioned strong cooperation among various agencies, including Border Police, Immigration Services and NGOs, viewing this collaborative approach as enhancing the efficiency of responses to potential trafficking situations and aiding comprehensive support for refugees. A government representative from Romania also emphasized the efforts to inform refugees about their rights and the risks of trafficking. These initiatives were seen as important in empowering refugees to recognize and avoid potential exploitation. They also pointed out resource and personnel

constraints in relevant agencies, which, they suggested, might affect the efficiency of responses to trafficking, given the scale of displacement and the number of Ukrainian refugees in Romania.

Similarly, government representatives in Poland emphasized the role of increased surveillance and the presence of trained officers at key locations as vital in preventing trafficking. For example, immigration officers were equipped with specific protocols for handling potential trafficking cases, particularly focusing on children and other vulnerable groups. One government representative emphasized the role of awareness-raising efforts and suggested that distributing more than half a million leaflets and posters throughout Poland, alerting refugees to potential risks of human trafficking, significantly contributed to the prevention efforts. Government representatives in Poland also highlighted the role of intra-agency cooperation and collaboration with Ukrainian law enforcement. They also underlined the importance of working with NGOs in providing support and protection to refugees, including setting up specialized centres for unaccompanied and separated children and keeping records of vulnerable individuals to ensure their safety and well-being. The ongoing collaboration with Ukrainian law enforcement, which enabled the exchange of intelligence, was crucial in pre-empting potential trafficking situations and addressing cases where recruitment occurred in Ukraine.

## SPATIAL AND TEMPORAL DYNAMICS OF VULNERABILITY

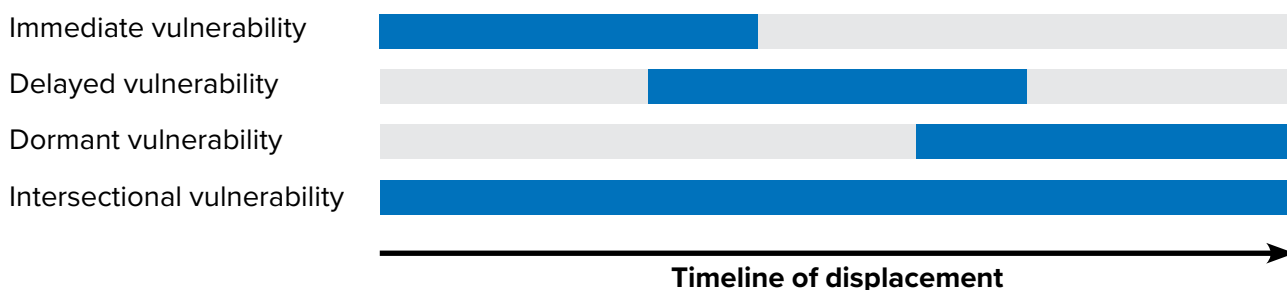
Understanding vulnerability as a multidimensional concept, with each dimension underpinned by various factors that intersect and operate on a continuum from high risk to high resilience, highlights the spatial and temporal character of vulnerability in the

context of displacement. This perspective recognizes that vulnerability is not static, but varies across different situations and over time, affecting individuals' exposure to abuse, violence and exploitation. This specific configuration of vulnerability factors, illustrated in **Figure 1**, is unique to the national contexts of the two case-study countries discussed in this report. These dimensions of vulnerability would probably differ in other national settings, including Ukraine itself, where risks of internal trafficking of Ukrainian nationals or trafficking of TCNs might present distinct challenges. This highlights the importance of continuous monitoring and assessment across various national contexts to adapt to the dynamic nature of these issues. Additionally, the ATTF Report 1 points out not only the spatial aspects of vulnerability, but also its temporal dynamics (IOM, 2023a), noting that vulnerabilities evolve over time, as confirmed by the key informants in this study. The ATTF Report 1 distinguishes between immediate and delayed vulnerabilities, emphasizing the impact of residual risks. This distinction highlights the temporal dimension and the evolving nature of vulnerability over time. The current report expands this understanding by introducing two additional types: compounded vulnerability and dormant vulnerability. These additions respond to the dynamic and increasingly protracted nature of the crisis, deepening the understanding of how vulnerabilities change over time in response to ongoing conditions.

Immediate vulnerability refers to the acute risks and challenges faced by individuals and communities displaced internally or across national borders. It encompasses threats to physical safety, mental health and well-being that arise rapidly from conflict, requiring urgent response. These vulnerabilities, characterized by their immediacy and severity, often present life-threatening situations and critical survival challenges, including risks to physical safety, lack of essentials like food and shelter, psychological stress and legal issues related to displacement. Effective humanitarian intervention is crucial to mitigate these risks, provide support and protection, and uphold the rights and dignity of those affected. The ATTF Report 1 notes that initial responses to the Ukraine crisis “has likely been effective in reducing the immediate, overall vulnerability to trafficking resulting from large-scale displacement and family separation” (IOM, 2023a:22).

Delayed vulnerability refers to the latent or extended risks and challenges that emerge over time, following the initial displacement phase. Unlike immediate vulnerabilities, which appear directly and swiftly after displacement, delayed vulnerabilities often develop gradually as displaced individuals and communities adjust to new realities. These vulnerabilities can arise from the prolonged nature of displacement, insufficient initial responses and evolving needs. The ATTF Report 1 noted that “as time passes and people remain displaced for longer, savings run out, and access to housing and labour becomes more

**Figure 2: Temporal dimensions of vulnerability**



difficult, there may be a 'delayed vulnerability'. This may lead to cases of exploitation and/or trafficking" (IOM, 2023a:24). This assessment is increasingly relevant as economic difficulties worsen for many Ukrainian refugees, impacting their ability to integrate into host communities economically and socially, leading to sustained poverty, marginalization and dependence. Challenges recorded as part of this research include barriers to education, employment, housing, reduced welfare support, and difficulties in accessing ongoing health care and psychological support.

In the context of displacement, the concept of compounded vulnerability describes a scenario in which risks accumulate and interact over time, enhancing each other in a domino effect. This dynamic leads to an escalating cycle of adversity where one vulnerability can trigger additional challenges, creating a complex web of interconnected difficulties. Compounded vulnerability highlights the multifaceted nature of risks faced by displaced and stateless people, illustrating how vulnerabilities are interlinked and mutually reinforcing, significantly complicating recovery and adaptation efforts. Key informants have mentioned the impact of unresolved vulnerabilities adding another layer of difficulty and amplifying already existing risks, particularly among the most vulnerable groups such as children, women, older persons and persons with disabilities.

All key informants expressed concerns about the uncertainty surrounding the continuation of the current protection regime, including government financial assistance programmes, and what might replace it for Ukrainian refugees. These concerns relate to what can be described as dormant vulnerability, where refugees' rights and protections, currently secured by legislation, are at risk of changes. Key informants in this research expressed concerns that potential alterations or withdrawal of these legal protections could significantly impact refugees' circumstances, leading to new vulnerabilities at both situational and structural levels.

The temporal dynamics of vulnerabilities in war-related displacement form a nuanced continuum that evolves over time, affecting refugees differently. Initially, refugees face immediate vulnerabilities like loss of shelter or potential exposure to violence, which can be mitigated with timely protection measures. As time progresses, these may develop into delayed vulnerabilities, such as enduring psychological stress and socioeconomic integration challenges, leading to compounded vulnerabilities as these challenges interact and worsen each other. Dormant vulnerabilities may emerge later, triggered by changes in circumstances or withdrawal of support, revealing latent risks. This underscores the need for responsive and adaptive support strategies that evolve with the changing needs of forcibly displaced people.

# RECOMMENDATIONS



## **Protection interventions should be human rights-centred, evidence-based and better targeted.**

Over time, a general consensus has developed that the reason large-scale trafficking of Ukrainian refugees has not yet emerged following the Russian Federation's invasion of Ukraine is that interventions “worked”. Practitioners and key informants often point to the enactment of the EU Temporary Protection Directive, which provided rapid access to temporary protection status and, together with visa-free travel for Ukrainian citizens,<sup>42</sup> enabled most refugees from Ukraine to access EU territory and protection as well as to move freely across borders to neighbouring and European Union countries and enjoy the right to access labour markets and social protection packages, as the interventions that worked to prevent trafficking. If accurate, this assessment would have important implications for policy and practice. It would imply that these measures should remain in place, in this context, until Ukrainian refugees no longer need them and/or are able to return home and rebuild their lives in Ukraine. It would also imply that similar measures should be undertaken in future displacement and refugee contexts.

This assessment is appealing as it aligns with established theories and knowledge – for example, that irregular and unsafe movement across borders increases vulnerability and exposure to trafficking in persons – and provides an explanation for the low incidence of trafficking. However, the evidence base demonstrating that this package of measures

did indeed work is limited and largely rests on the fact that reported incident rates have not increased, revealing a belief that large-scale trafficking in persons in this context would otherwise have been inevitable due to demonstrable vulnerabilities.

While this belief may be accurate, it is not proven. Additional research is needed to complement the complex picture of vulnerability that is emerging with knowledge on perpetrators and potential perpetrators – who is likely to engage in trafficking in persons in such circumstances and why they appear not to have done so in any great numbers, at least yet - in this context. It is also necessary to examine more thoroughly anti-trafficking efforts by law enforcement to assess the extent to which, if any, law enforcement actions discouraged trafficking.

It is also necessary to examine more thoroughly other competing explanations for the low incidence rate, such as the possibility that trafficking in persons is happening, but is not being detected and/or reported, or is being misidentified as labour disputes or other forms of lower-level crime, or that small-scale, lower-level single-perpetrator trafficking is being ignored.

Protection interventions should also take into account findings on vulnerability to trafficking, which is dynamic and changes over time. Not all Ukrainian refugees are vulnerable to trafficking, or vulnerable in the same ways. Further, some sectors appear to be more prone to exploitative practices. Programmes that are able to target individuals with known vulnerabilities, and to intervene in sectors with demonstrated risks, are more likely to have greater impact.

42. Some restrictions continue to exist for holders of non-biometric passports, see European Commission [Fleeing Ukraine: Travel inside the EU](#).



### **Ensuring safe pathways to protection and access to rights and services for Ukrainian refugees**

Research demonstrates a clear link between human trafficking and displacement contexts where safe pathways of admission to seek and enjoy asylum/protection are not made available. The situation with Ukrainian refugees highlights the critical need for continued protection and effective access to rights and services in host countries as among the critical measures for the effective prevention of human trafficking.

National governments should ensure that measures such as the temporary protection regime and visa-free travel remain in place until Ukrainian refugees no longer need them and/or can return home safely. Furthermore, similar measures should be implemented in future displacement and refugee contexts to provide safe and legal pathways to seek and enjoy asylum, reducing the risk of refugees resorting to irregular and unsafe movements, which increase their vulnerability to human trafficking.

By ensuring safe and legal pathways, and maintaining access to essential rights and services, host countries can significantly mitigate the risks of trafficking and exploitation faced by refugees. This approach reinforces the importance of a rights-based, evidence-driven framework for protection interventions.



### **All forms of vulnerability should be addressed, as a means of both upholding human rights and of reducing vulnerability to trafficking in persons**

The cluster analysis – which analysed the distribution of challenges experienced by Ukrainian refugees in Poland and Romania – identified three main groupings: those who reported not facing any of the listed challenges (48%), those who reported health challenges only (14%) and those who reported multiple challenges (39%). While this shows that a significant portion of respondent refugees have not demonstrated any particular vulnerabilities, it also reveals that a significant minority of them have multiple and compounded challenges. Not many respondents reported direct experiences of violence, exploitation or abuse, but a significant number did report a range of socioeconomic challenges, including health concerns, financial hardship, employment difficulties, housing insecurity and experiences of discrimination.

These concerns should be directly addressed, because doing so would uphold the human rights of Ukrainian refugees. These issues are also broadly understood to be associated with vulnerability to trafficking in persons. This “latent” vulnerability to trafficking will remain in place until the underlying vulnerabilities are addressed and therefore addressing them remains important in any comprehensive anti-trafficking approach.

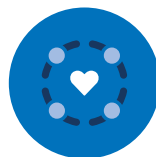




**More work is needed to better understand vulnerability to trafficking in persons, which will facilitate better targeting of interventions**

Over the past few years there has been significant development in efforts to understand vulnerability to trafficking in persons, reflected in publications by key actors in the global anti-trafficking space, including the Inter-Agency Coordination Group against Trafficking in Persons (ICAT), IOM and UNODC. These publications all present vulnerability as multifaceted with a socioecological lens, looking at risk at different levels or in different contexts: personal or individual, situational, circumstantial or contextual, community and/or structural.

This paper used quantitative methods to look for statistical associations between personal and situational vulnerability indicators and (a) experience of a range of challenges (of health, financial, shelter, personal safety, food security, theft and access to personal documents) and (b) exposure to violence, exploitation and abuse. It did find that when personal and situational vulnerabilities are considered together, they account for some variances in the experiences of problems, challenges and exposure to violence, exploitation and abuse. In particular, age, marital status and experiences of discrimination were found to have predictive power. While these findings are not generalizable to all Ukrainian refugees, they do offer a pathway forward to better understanding who, under what circumstances, is vulnerable to trafficking, which would allow for better targeting of prevention, protection and assistance activities.



**Protection and assistance efforts should focus on the protection systems that form the basis for effective, longer-term response**

The key challenges and vulnerabilities identified in this study relate to health conditions and access to health care, financial precarity and access to financial support, exposure to unfair or exploitative working conditions, exposure to discrimination, and limited accessibility to social and protection services due to language. Strengthening health systems, improving access to financial services for all, combating labour exploitation, addressing discrimination, and improving accessibility of social and protection systems for all, are long-term processes. While it may be necessary to scale up certain activities and services rapidly, in the short term, to prevent trafficking and in response to displacement crises, it is clear that once such crises become protracted, the focus should shift to long-term and multifaceted support and development of the protection and social welfare system upon which anti-trafficking and other responses are built. Humanitarian actors and responses should bear this in mind from the earliest stages of response, and adopt and implement systems-strengthening approaches from the earliest days of a displacement crisis. This may require adaptations in programme design and implementation, as well as advocacy with partners and donors to ensure that local partners and national systems are built up and supported in the longer term.

There needs to be a strengthening of the collaboration between humanitarian actors and counter-trafficking NGOs. Counter-trafficking NGOs can play a crucial role in supporting humanitarian partners, especially when they possess local knowledge and understanding of the localized trafficking threats and the operations of traffickers in the country. Their expertise in identification processes and

specialist services, and their ongoing work to strengthen policy, practice and systems transformation in a country is invaluable. This collaboration should also include increased capacity-building and training around risk reduction, trafficking indicators and responses to human trafficking, so that issues can be quickly identified, acted upon, and mitigated across all agencies – police, border control, social care services and humanitarian actors.

Additional specific protection recommendations and opportunities to mitigate risks of trafficking, exploitation and abuse could include:

### **Proactive and Inclusive Mitigation**

**Measures:** national governments should implement or continue implementing proactive measures to counter risks of exploitation, trafficking and abuse by ensuring continued access to social and legal protection. These measures may include:

- Removing procedural barriers limiting rights of movement or access to territory (including access to civil status/ documentation).
- Ensuring non-discrimination in the applicability of the Temporary Protection Directive (TPD), particularly for third-country nationals, Roma or stateless individuals.
- Removing procedural and practical barriers to accessing employment, housing and health care.
- Supporting access to employment through diploma accreditation schemes, accessible and free language classes, provision of free childcare, and quality mental health and psychosocial support.
- Ensuring continued cash assistance/ subsidies for those at risk.
- Applying an intersectional lens in the design and implementation of these social and legal protection schemes.

### **Enhanced Screening and Community Involvement:**

- Enhance screening at the border and at all stages of the asylum or registration process with the support of UNHCR and other United Nations agencies and specialized NGOs to identify vulnerabilities and facilitate safe referrals.
- Strengthen and amplify the role of communities and community-based organizations in identifying persons at risk of trafficking and providing prevention and response support.

### **Scaling Up Specialized Services:**

- Scale up specialized services with adequate capacity and resources to meet the needs of those at risk.
- Enhance services such as language-accessible hotlines, specialized psychosocial support, sexual and reproductive health services, and legal support.

### **Sustainable Safe Housing:**

- Ensure refugee access to sustainable safe housing.
- Systematize State oversight of transitional accommodation schemes with minimum safeguards, vetting protocols and regular oversight.
- Ensure safe and accessible reporting mechanisms with clear accountability and mitigation protocols accessible to all.

### **Prioritize Individual Safety Over Immigration Enforcement:**

- Ensure that safeguarding rights and ensuring access to protection is prioritized over immigration enforcement.
- Decouple investigation and prosecution from accessing protection and services for trafficked persons or those at risk of trafficking.

- Ensure timely referral and access to asylum procedures with the provision of free counselling on rights to international protection or asylum.
- Integrate adolescents within the educational and employment system and strengthen targeted support and programming for this highly vulnerable group.

#### **Vetting and Oversight of Volunteers and Organizations:**

- Systematize State vetting, registration, and oversight of volunteers and organizations offering transportation and accommodation to displaced persons.

#### **Address Discrimination:**

- Address discrimination against Roma, persons with disabilities, and individuals of diverse sexual orientations and gender identities in accessing rights and services, including registration and safe, suitable accommodation, at the national government and ministerial levels.

#### **Monitor Online Job Platforms:**

- National authorities and experts should oversee and monitor online job platforms and provide secure employment platforms offering vetted employment to reduce risk.

#### **Enhance Information-sharing and Awareness:**

- Enhance information-sharing and awareness-raising within the community.
- Provide information on risks of trafficking, rights and available services through multiple channels and formats accessible to the most vulnerable.

#### **Continuous Mapping and Referral Pathways:**

- Conduct continuous mapping of services at the national and regional levels.
- Develop and update functional referral pathways to response services and disseminate them to all relevant stakeholders.

#### **Effective Two-Way Communication:**

- Ensure that an effective two-way communication mechanism exists for refugees to be consulted on initiatives made on their behalf.
- Provide safe and effective channels for refugees to raise concerns or provide feedback regarding barriers to access and protection risks.

# APPENDIX I: ASSESSING THE PREVALENCE OF HUMAN TRAFFICKING: METHODOLOGICAL APPROACHES AND CHALLENGES

This appendix contains a summary of the literature reviewed as part of developing the methodology for this study. The first section will explore the conceptual difficulties, focusing on the definitional, practical and ethical dimensions; the second section will assess the existing methodological approaches for estimating the prevalence of human trafficking. This review set the context for describing the multimethod approach adopted within the context of this research.

## CONCEPTUAL DIFFICULTIES

**1. Definitional and definitional challenges:** trafficking in human beings is a crime with one specific particularity – it gathers “in one single crime many aspects of other crimes” (Le Coz, 2018:xxiii). In this context, as McAdam (2019:29) notes, despite “the introduction of an [international] definition of trafficking in persons, discussion and debate as to what is meant by trafficking, forced labour and slavery continues”. Similarly, Farrell and de Vries suggest that “countries and states within countries have divergent definitions of the activities that constitute trafficking crimes” (Farrell and de Vries, 2020:148). White (2020:1) further comments on a multitude of names and forms for human trafficking, with definitions varying substantially across different countries and cultures, as well as among researchers. Such definitional differences continue, in turn,

to “muddy data collection efforts where States do not collect, disaggregate or share data on common grounds. It can also mean that policies proposed by one State or group of States may be inconsistent with those pursued by others, weakening what should be harmonized approaches that leave no gaps for error or impunity” (McAdam, 2019:32). De Vries and Dettmeijer-Vermeulen (2015) also observe that variations in legal definitions may impact the availability, quality and scope of data collection on human trafficking. These differences have a significant impact on comparative research and data aggregation at both the international and national levels. At the European level, for example, even though the European legal regime on trafficking in human beings remains, as noted by Piotrowicz (2018:49), “the most advanced regional system in the world”, the data on human trafficking compiled by Eurostat, the statistical office of the European Union, may be presented in a single data file; however, by the Eurostat’s own admission, these data may also reflect significant variations across the European Union, even when adjusted for population size. As noted in its latest release of the statistics on trafficking in human beings (as of January 2024), “This can be due to different approaches to reporting data in police, prosecutors and court systems, to different levels of transposition of the Directive across the EU Member States and different criminal justice responses to trafficking in human beings” (Eurostat, 2024a). The need to improve the data collection on

human trafficking has been emphasized by the European Commission in its 2022 Report on the Progress Made in the Fight against Trafficking in Human Beings (European Commission, 2022d). The Report calls for improvements in “data recording and data collection on trafficking in human beings to ensure reliable and comparable information for tailor-made policies” (European Commission, 2022d:para. 3.1). A range of suggestions to improve data collection have also been included into the Proposal for a Directive of The European Parliament and of The Council amending Directive 2011/36/EU on preventing and combating trafficking in human beings and protecting its victims.

On a practical level, as numerous accounts from non-governmental organizations working with victims of human trafficking have shown, it can be challenging to identify trafficking cases even if the actions/means/purpose elements of a relevant legal definition are present, and to distinguish them from other exploitative labour situations that may violate rights and require intervention, but do not meet the criteria for trafficking. Additionally, as noted by Huang (in White, 2020:10), differences in cultural perceptions of coercion or involuntariness can further complicate the identification of victims and the estimation of prevalence, especially among vulnerable populations.

**2. Access issues (“Who” question):** both victims and criminals involved in the crime of human trafficking can be considered as “hidden populations”, defined by Heckathorn as a population where “no sampling frame exists and public acknowledgment of membership in the population is potentially threatening” (Heckathorn, 1997:174). Farrell and de Vries (2020:149) suggest that hidden victims of trafficking do not come to the attention of officials who might be expected to record and classify their experiences. In addition, some cases of human trafficking

could be misidentified by relevant authorities as other offences, for example, as cases of labour exploitation. Elgaby and Camilleri (2021:2) note in this respect that: “The unknown ‘size and boundaries’ of these groups make rigorous quantitative research and statistical analyses substantially more difficult to carry out, given an unknown sampling frame to guide data collection.”

**3. Heterogeneity of victims:** although most victims share the overarching experience of exploitation, they are a diverse group distinguished by various factors such as age, nationality, legal or migratory status, gender identity/expression, form of exploitation (e.g. labour or sexual exploitation), socioeconomic background, and both physical and mental health status. This intrinsic diversity presents challenges for both research and intervention strategies, as a single approach may not be suitable for the entire heterogeneous population.

**4. Victim self-identification and misidentification** present additional challenges. Individuals may not recognize or may refuse to acknowledge their status as victims of trafficking, due to lack of awareness/knowledge of what constitutes trafficking, isolation, stigma, gender stereotypes, fear of traffickers, or fear of deportation. Consequently, any method for estimating human trafficking prevalence may be inherently incomplete without a comprehensive understanding of awareness and self-identification among the affected population.<sup>43</sup>

Frontline workers, including police and agency personnel, require proper training to identify victims of trafficking accurately, which is not always provided consistently. This issue is particularly relevant for Ukrainian refugees, who may not be recognized as potential trafficking victims due to misconceptions about their status and rights. Additionally, biases about how victims should appear – for

43. For an overview of challenges related to the identification of trafficking victims, see Brunovskis and Surtees (2019).

example, expecting victims of trafficking for sexual exploitation to be female, or victims to appear distressed rather than confrontational – can lead to misidentification during initial assessments. Leffer (in White, 2020:7) emphasizes the importance of ensuring that frontline responders have access to the necessary tools and resources to identify victims accurately. Understanding the nuances within the exploited population is crucial for effective interventions, which can be compromised by conflating trafficking with issues like legal sex work, smuggling, or irregular migration, leading to evidence-poor and hard-to-evaluate interventions.

**5. Ethical issues:** membership in a hidden population often involves behaviour that is stigmatized or criminalized, which raises significant ethical concerns. There is an imperative need for enhanced privacy and confidentiality when engaging with identified or potential victims for research purposes. Maintaining this confidentiality can be complex, particularly as researchers may encounter legal mandates to report crimes or to refer individuals for support, which necessitates interaction with authorities. The principle of “do no harm” dictates that research participants should not experience physical or psychological harm due to their participation. However, when researching hidden populations, there is an increased risk of inadvertently causing harm through exposure, stigmatization, or legal consequences if confidentiality is compromised.

## APPROACHES TO ESTIMATING THE PREVALENCE OF HUMAN TRAFFICKING

Definitional ambiguities and access difficulties lead to a variety of methodological challenges when measuring the prevalence of human trafficking. As noted by UNODC (2022:16): “Achieving international consensus on the

precise questions for measuring trafficking, as defined by the UN Protocol, and on the suitable sampling frames and interview methods is challenging.” Discrepancies in the methodological operationalization of definitions may vary based on the scope, duration and scale of the research. Traditional sampling techniques, such as snowball, key informant and targeted sampling, can be used, but with significant limitations. Snowball sampling relies on participants’ networks, which may not be extensive among isolated trafficking victims. Key informant data depends on the extent of key informants’ engagement with identified or presumed victims. Targeted sampling, which focuses on specific locations or populations, may overlook victims in inaccessible areas or those in isolation. Inconsistent definitions and non-standardized data collection across trafficking research exacerbate the difficulty in measuring its prevalence (Schroeder et al., 2022:47).

Several review papers have recently been published focusing on various methodologies and approaches towards estimating the prevalence of human trafficking, which are organized in the table below. However, it would be prudent to precede this review with a quote from Barrick and Pfeffer, who, based on their comprehensive review of existing studies on human trafficking prevalence, concluded:

“Of the four promising estimation strategies that we identified, each method has a particular set of strengths and weaknesses for estimating the prevalence of human trafficking. Although some methods may have broader application than others, there is not a single method that could accommodate studying human trafficking in all its varied context” (Barrick and Pfeffer, 2021:12).

**Table 5** summarizes findings from a review of four publications that examine various approaches to measuring the prevalence of human trafficking. It also provides a brief overview of these methods, concluding with a recommendation to adopt a microlevel

approach. This approach favours studies that focus on specific locations and populations over large-scale national estimates.

Overall, prevalence data on hidden populations can be collected through two broad groups of methods: direct engagement with respondents, or the analysis of administrative data. Methodologies such as respondent-driven sampling, time-location sampling and network scale-up methods actively involve participants and their social networks in the research process. Direct engagement with participants serves not only to estimate preva-

lence, but can also address the immediate needs of the affected individuals (including referral to support and protection services and/or formal identification and recognition as a victim of human trafficking). These stand in contrast to approaches like Multiple System Estimation, which do not engage with individuals, but instead rely on existing administrative records to estimate the size of hidden populations.

The review below consists of four summaries, based on the literature identified above and integrating some broader methodological

**Table 5: Methodologies for estimating human trafficking prevalence in recent studies**

Source	Farrell and de Vries (2020)	Global Fund to End Modern Slavery (2021)	Schroeder et al. (2022)	Barrick and Pfeffer (2021)
<b>Conceptual / methodological basis for the overview</b>	Not identified / explained	No references to the scoping /review approaches.	Not identified/ explained	Comprehensive scoping review of existing studies on human trafficking prevalence (n = 44)
<b>Methods mentioned/ reviewed</b>	(a) Capture-recapture methodologies using open-source information (b) Multiple system estimation procedures utilizing administrative records (c) Field-based research utilizing chain referral sampling methodologies to identify victims in local communities (d) The use of online domain data and network approaches	(a) Household Surveying (b) Respondent-Driven Sampling / Link-Tracing Sampling (c) Time and Location Sampling (d) Network Scale-up Method (e) Multiple Systems Estimation/ Capture– Recapture (f) Hybrid approaches	(a) Respondent-driven sampling (b) Time–location sampling (c) Network scale-up method (d) Capture-recapture	(a) Traditional probability samples (b) Multiple Systems Estimation and Mark-Recapture (c) Respondent-driven Sampling and Link Tracing (d) Miscellaneous approaches: – Secondary data from multiple sources – Quantifying potential pull factors and quantifying demand to estimate the numbers of victims - Administrative data and surveys of social service providers Additional approaches: (e) Time-location sampling (f) Network scale-up

considerations as identified in “Hard-to-survey Populations” (Tourangeau et al., 2014) – a collection of contributions which look at the populations and settings that make surveys hard to conduct, and at the methodological approaches in response to these challenges.

### **Traditional probability samples / general population and targeted surveys**

General population surveys can be used to research hidden populations, but there are significant challenges. The primary issue is that hidden populations, by nature, do not typically constitute a large portion of the general population and may not be accurately represented in a standard sampling frame. Exclusions based on citizenship status or institutionalization, as well as the oversight of individuals with transient housing situations or undocumented people, can result in data that underrepresent certain populations. These factors significantly affect the reliability of surveys, especially in areas where the excluded groups constitute a large segment of the population.

In the specific case of human trafficking, the use of standard probability sampling faces considerable challenges. The sparse distribution of trafficked individuals means that an impractically large sample would have to be screened to find an adequate number of subjects. Moreover, the stigma associated with being trafficked often leads to intentional misreporting or withholding of information by victims, as they seek to avoid the repercussions of disclosure. Such stigma-driven underreporting, combined with the logistical challenge of reaching a statistically significant number of hidden individuals, renders traditional probability sampling methods both infeasible and ineffective for accurate research in this field.

Targeted surveys serve as a crucial tool for investigating hidden populations, particularly those impacted by human trafficking. These surveys focus on specific areas or groups identified through risk factors or

connections to known victims, improving the chances of reaching individuals who are otherwise difficult to detect through broad-scale approaches. However, despite their effectiveness in capturing data from these elusive populations, targeted surveys demand substantial resources and must be conducted regularly to monitor trends, presenting significant budgetary and logistical challenges. In addition, the ethical considerations and practical difficulties of reaching extremely hidden groups are significant. In this context, most estimation methods, including targeted surveys, are often dependent on self-identification by the individuals concerned, who may only become accessible after seeking assistance or following an intervention by support services or law enforcement.

### **Multiple Systems Estimation and Capture-Recapture**

Multiple Systems Estimation (MSE) and mark-recapture are quantitative methods used to estimate the prevalence of a phenomenon, particularly within populations that are difficult to observe directly, including victims of human trafficking. MSE relies on existing secondary data from multiple sources, while mark-recapture involves primary data collection to identify individuals across independent samples. MSE is appropriate and can yield more accurate estimates when substantial administrative records are available. In this context, MSE can integrate information from varied entities, including law enforcement and social service agencies, to estimate population sizes. Mark-recapture, on the other hand, involves capturing a sample of the population, releasing it, and then recapturing to assess the frequency of reidentification.

These methods have significant limitations, especially in the context of human trafficking. For MSE, the quality and availability of existing data are critical. Victims must self-identify or be identified and be recorded by various agencies to be counted, which is often hindered by victims’ reluctance or inability to seek help, challenges in (self)identification,



and lack of consistent training for frontline workers. Similarly, capture–recapture methods are constrained by assumptions such as the stability of the studied population over time, equal chances of being captured, and independence of capture events – conditions that are seldom met when researching human trafficking, especially in the context of conflict-driven displacement.

Furthermore, MSE requires that the population be closed, with each person uniquely identifiable and equally likely to be included on the lists, and also that being on one list is statistically independent from being on another. These conditions are difficult to achieve; the lack of a National Referral Mechanism or poorly coordinated approach to data collection within an existing NRM may exacerbate these challenges. Practical issues, such as the reluctance of agencies to share confidential data (or legal constraints on data-sharing) and the lack of standardized definitions across different data sources, compound the difficulties in employing MSE effectively. For national-level studies relying on MSE, harmonization of victim lists from multiple entities is imperative. If there is a lack of a comprehensive national mechanism for identifying and supporting victims of trafficking, a dedicated research team is necessary to collaborate with institutions to extract relevant data from administrative registers, applying definitions consistent with national legislation and case law.

### **Time-Location Sampling**

Time-Location Sampling (TLS) is a method designed to study hard-to-reach populations by sampling them at specific locations and times where they gather. This approach is employed when traditional sampling frames are not available due to the target population’s hidden or mobile nature. The TLS process includes three stages: identifying gathering points, constructing a sampling frame and collecting data. The formative stage involves qualitative data collection from informants and the analysis of secondary data to identify

characteristics of the total population. Mapping and a two-stage sampling process follow, taking into account the frequency and timing of visits by the target population to the venues. A combination of random and systematic sampling approaches is then employed to select venues and participants. The collected data must account for patterns in mobility and venue attendance, as these influence the likelihood of inclusion in the sample and inform the necessary sampling weights. In addition, data concerning security and safety that may impact participation are also gathered. Researchers visit selected locations and systematically invite every n-th person for an interview or observation. The method ensures that each individual in the target population has a known and non-zero chance of being included in the sample, which is essential for producing statistically representative data.

TLS has a range of limitations. Access to some venues or population members may be restricted, leading to skewed results. The method assumes a balanced representation of the target population across selected venues and times, which may not be accurate if there is under-coverage or over-coverage. Under-coverage can result from target individuals not frequenting the sampled locations, while over-coverage can happen with individuals who visit multiple times, impacting on the transformation of visit samples to person samples. Accurately estimating the number of visits per individual is another challenge and can introduce bias if the estimates are incorrect.

When conducting Time-Location Sampling among hidden populations victimized by crime, ethical considerations are paramount. Informed consent must be truly informed and voluntary, given the complex dynamics of understanding and autonomy within these groups. The confidentiality of participants must be stringently guarded to protect against any repercussions of their data being revealed. The principle of no harm must be respected to prevent exacerbating the vulnerability of or

risk to participants; any psychological distress must be responded to sensitively. Legal risks associated with uncovering criminal activities necessitate careful navigation between ethical obligations to participants and legal responsibilities. Avoiding exploitation and managing power imbalances are critical to maintaining the dignity and respect of participants. Finally, there is an ethical obligation to consider the potential disruption to communities and avoid actions that may inadvertently increase vulnerability or attract undesirable attention to the participants' locations.

**Network/referral-based methods /  
Link-tracing / Respondent-driven sampling**

Respondent-Driven Sampling (RDS) and related chain-referral approaches such as network or link-tracing sampling, are methods designed to study hard-to-reach or hidden populations. In RDS, initial participants, known as “seeds”, are identified within a target population; these seeds then refer other potential participants, creating a chain. This process repeats in waves, with each wave of participants nominating further individuals from their network who meet the study's criteria. RDS is often employed when traditional sampling frames are inadequate or when little information exists about the population in question. The method also incorporates statistical parameters and collects data about the size of each participant's network, which is used for weighting the samples.

Various strategies exist within the realm of network-based sampling, including the network scale-up method, which aims to estimate the target population size and characteristics by scaling up administrative data. These methods leverage existing social networks to provide more comprehensive samples than could be obtained through conventional sampling techniques, such as simple random or stratified sampling. Unlike traditional methods, network-based sampling aims to exploit social connections, often resulting in a final sample with significant network overlaps due to the nature of social interlinking.

However, these methods come with limitations. For example, even if a hidden population is reached, individuals within that population may not be willing or able to disclose sensitive information, such as victimization. Resource constraints can also limit the extent to which these methods can be applied; RDS often limits estimates to smaller geographic units and must be replicated for broader generalization. The experiences captured might be localized and not representative of the broader population, necessitating caution when interpreting results. Finally, the very nature of chain-referral sampling assumes a degree of trust and existing relationships between a recruiter and recruits, which might not always hold true.

# APPENDIX II: ASSESSING THE IMPACT OF PERSONAL AND SITUATIONAL VULNERABILITY INDICATORS

## A. Personal and Situational Vulnerability, and Encountering Problems and Challenges since Leaving Ukraine

The aim of the analysis reported here is to determine the extent to which a range of Personal and Situational Vulnerability indicators, drawn from the DTM NIS survey, can predict the likelihood of Ukrainian refugees encountering challenges and problems since leaving Ukraine, as reported by respondents in the DTM NIS survey.

**Table 6** displays the percentage of refugees who answered “yes” to each question in the “Problems and Challenges” module of the DTM NIS survey. Out of 755 respondents who identified themselves as Ukrainian nationals and confirmed that they left Ukraine due to the war, 751 provided answers to all the questions in the “Problems and Challenges” module. The most common challenges reported were

health and financial issues. Considering the number of experiences reported per person, just over half of the respondents (53%,  $n = 400$ ) encountered at least one challenge, while the remaining 47 per cent ( $n = 351$ ) reported no challenges. Among those who reported experiencing challenges, the majority of respondents faced one or two challenges (80%,  $n = 319$ ), with the remainder facing up to five challenges.

For the purposes of these analyses, the experience of challenges is operationalized as a dichotomous variable: “0” represents respondents who reported no challenges, and “1” represents respondents who reported at least one challenge. Within the context of data collection for the DTM NIS, the nature, scale and impact of different challenges on individual respondents cannot be differentiated, as respondents only indicate whether

**Table 6: Responses to the “Problems and Challenges” module: percentage of refugees indicating “Yes” or “Prefer Not to Answer”**

Since you left Ukraine, have you or your family members with you faced any problems/ challenges:	Yes (%)	PNTA (%)
Robbery	32 (4.2%)	10 (1.3%)
Lost/stolen documents	12 (1.6%)	6 (0.8%)
No shelter/place to sleep	53 (7.7%)	6 (0.8%)
Health problems	258 (34.2%)	16 (2.1%)
Financial problems	232 (30.7%)	7 (0.9%)
Hunger	14 (1.9%)	8 (1.1%)
Attacks/threats by others	40 (5.3%)	9 (1.2%)
Other problems	84 (11.1%)*	22 (2.9%)

Note: \*  $p < 0.05$ .

they experienced these challenges without providing further details. For example, the range of “health problems” could vary from minor ailments, such as colds and minor infections, to serious conditions requiring ongoing medical treatment, such as chronic diseases or life-threatening illnesses. Once operationalized as a dichotomous variable, the nature of these challenges is further simplified to a mere confirmation of whether the refugees experienced any challenges (Yes) or did not experience any challenges (No).

### Personal Vulnerability Indicators

The first logistic regression analysis tests the power of the following personal vulnerability indicators (as recorded by the DTM NIS) in distinguishing between refugees who reported challenges and those who did not: (a) age, (b) gender, (c) marital status, and (d) travelling with children (see [Table 7](#)).

The analysis excludes any participant with missing values on any of the variables of interest. For this reason, a chi-square test of independence was performed to evaluate whether having missing values (or “missingness”) was associated with a higher probability of having experienced challenges during the journey from Ukraine. The relationship between these variables was not significant,  $\chi^2(1, 751) = 0.783$ ,  $p = 0.376$  for challenges on the journey from Ukraine.

An independent t-test was performed to determine whether respondents with missing values were significantly younger or older than those with complete values. The results showed a significant difference,  $t(151.38) = -2.46$ ,  $p = 0.015$ ; those excluded from the analysis due to missing values tended to be significantly older ( $M_{age} = 44.17$ ,  $SD = 17.13$ ) compared with those included in the analysis ( $M_{age} = 40.21$ ,  $SD = 12.54$ ).

A chi-square test of independence was performed to evaluate the relationship between “missingness” and gender distribution. The relationship between these variables was significant,  $\chi^2(1, 755) = 17.48$ ,

$p < 0.001$ , indicating that respondents with missing data were more likely to be male when compared with those with non-missing data.

The distribution of types of exploitation experiences was also examined separately for those with missing and non-missing data; this distribution mirrored that in the entire sample, with health and financial problems being the most common experiences.

**Model Overview:** A logistic regression was performed to assess the effects of age, gender, marital status and travelling with children on the likelihood of experiencing challenges. The valid sample size for this analysis is  $n = 630$  ( $n = 290$  having experienced no challenges;  $n = 340$  having experienced at least one challenge). The logistic regression model was statistically significant,  $\chi^2(4) = 14.87$ ,  $p = 0.004$ , which means that the model fits the data well. However, the model has low predictive power, with a Nagelkerke  $R^2$  value of 0.03, suggesting that, overall, this model captures only a small proportion of the variance in the experience of problems and challenges; it correctly classified only 58 per cent of cases overall and only 29 per cent of those who reported experiencing no challenges. The low predictive power suggests that while some predictors are statistically significant, they do not account for a large portion of the variance in the outcome. This may be due to factors such as noise in the data, unaccounted variables that are also influential, or the intrinsic unpredictability of the outcome based on the variables included. It is also worth noting that explaining 3 per cent of the variance in a logistic regression context might still be significant, especially in complex phenomena where outcomes are influenced by many factors, some of which may not be included in the model.

In this context, it could well be anticipated that this logistic regression model would explain only a small percentage of the variance, owing to the inclusion of only a limited number of predictor variables. This model primarily

focuses on how fundamental characteristics such as gender and age interact with the likelihood of experiencing challenges. It does not explore interactions between variables, therefore not accounting for the intersectionality of characteristics such as gender and age. Consequently, while this model provides a foundational understanding, it also highlights the need for further research, which could investigate additional indicators and, potentially, offer a more nuanced understanding of the factors contributing to vulnerability.

#### Significant predictor: Age

Among the variables (indicators of vulnerability) assessed, age emerged as a significant predictor. The odds ratio (OR) for age was 1.01 (95% CI: 1.00-1.03,  $p = 0.044$ ), indicating that with each additional year of age, the odds of encountering problems and challenges increase by 1 per cent (assuming all other factors in the model are held constant). The effect size, although modest, is important in suggesting that older refugees are slightly more likely to experience challenges and problems than younger refugees.

#### Significant predictor: Marital Status

Among the variables (indicators of vulnerability) assessed, marital status emerged as a significant predictor. The odds ratio (OR) for being single, widowed or divorced, compared to being married or partnered, was 1.55 (95% CI: 1.06-2.28,  $p = 0.025$ ), indicating that single,

divorced or widowed refugees are 55 per cent more likely to experience problems and challenges than married or partnered refugees (assuming all other factors in the model are held constant). Despite the model's low overall explanatory power, the impact of marital status is clear and points to a demographic group that may benefit from tailored support in the context of displacement.

The personal vulnerability model, which is, in the context of this specific statistical analysis, limited to the impacts of age, gender, marital status, and travelling with children, demonstrates low predictive power overall. However, the findings provide valuable insights into the role of age and marital status in the likelihood of experiencing problems and challenges in the context of displacement.

#### Situational Vulnerability Indicators

The second logistic regression analysis tested the power of the available indicators of situational vulnerability (in the context of the DTM NIS) in discriminating between those refugees who reported experiencing problems and challenges, and those who did not. These indicators include: (a) having the funds to cover expenses, (b) employment status, (c) accommodation type, (d) legal or migratory status, (e) knowing where to seek assistance, (f) difficulty in receiving support and (g)

**Table 7: Personal vulnerability indicators predicting likelihood of having experienced problems and challenges since leaving Ukraine**

	B	S.E.	Wald	df	Sig.	OR	95% C.I. OR	
							Lower	Upper
Age	0.01*	0.01	4.07	1	0.044	1.01*	1.00	1.03
Gender (female)	0.35	0.23	2.25	1	0.134	1.42	0.90	2.25
Marital status (single, widowed, divorced)	0.44*	0.20	5.02	1	0.025	1.55*	1.06	2.28
Travelling with children (yes)	0.28	0.20	2.03	1	0.155	1.32	0.90	1.95
Constant	-1.00	0.38	6.96	1	0.01	0.36		

Notes: \*  $p < 0.05$ .

experiences of discrimination. However, two indicators were removed from this model for the following reasons:

- “Legal or Migration status” features a significant number of missing data points, with only four respondents lacking EU\_TP/Refugee status; this variable was excluded due to insufficient cases for a robust estimate of its effect.
- “Experiencing difficulty in accessing support” has 51 per cent missing values, which drastically reduces the sample size. It has been excluded in the context of this analysis.

As with the personal vulnerability analysis, a comparison was conducted between those excluded from the analysis due to missing values on these variables and those who were not, to determine whether they differ in terms of reported challenges, age and gender.

A chi-square test of independence was performed to evaluate the relationship between “missingness” and experienced challenges. The relationship between these variables was not significant,  $\chi^2(1, 751) = 0.178$ ,  $p = 0.673$ . This result reassures that “missingness” is not associated with a higher probability of having encountered challenges.

An independent t-test was performed to test whether those with missing values were significantly younger or older compared with those with complete values. The results showed a significant difference,  $t(99.48) = 3.43$ ,  $p < 0.001$ ; those who excluded from the analysis due to missing values tended to be significantly younger ( $M_{age} = 36.96$ ,  $SD = 9.47$ ) than those included in the analysis ( $M_{age} = 41.26$ ,  $SD = 13.75$ ).

A chi-square test of independence was performed to evaluate the relationship between “missingness” and gender distribution. The relationship between these variables was significant,  $\chi^2(1, 755) = 12.32$ ,

$p < 0.001$ . Respondents with missing data were more likely to be male compared with those with non-missing data.

The distribution of types of exploitation experiences was examined separately for those with missing and non-missing data; the distribution of responses mirrors that in the entire sample, with health and financial challenges being the most common experiences.

In conclusion, respondents with missing data on the situational vulnerability indicators are significantly younger and more likely to be male. However, in neither case are the respondents with missing data significantly more or less likely to have encountered challenges.

**Model overview:** A logistic regression was performed to assess the effects of funds to cover expenses; employment status; accommodation type; know where to seek assistance for help; difficulty in receiving support; and experiences of discrimination on the likelihood of experiencing challenges along the way. The valid sample size for this analysis is  $n = 696$  ( $n = 329$  with no experience of challenges;  $n = 367$  with at least one challenge experience). The logistic regression model was statistically significant,  $\chi^2(6) = 86.05$ ,  $p < 0.001$ , which means that the model fits the data well. The model explained only 63 per cent (Nagelkerke  $R^2$ ) of the variance in experience of challenges.

A number of significant predictors of the likelihood of experiencing challenges and problems were identified (while keeping all other indicators of situational vulnerability constant): having the funds to cover daily expenses, knowing where to seek assistance, and experiencing discrimination (see [Table 8](#) for all results).

#### **Significant predictor: Discrimination experience**

Among the variables (indicators of vulnerability) assessed, experience of discrimination emerged as a significant predictor. The odds ratio for experiencing discrimination was 5.67

(95% CI: 3.39–9.48,  $p < 0.001$ ), indicating that refugees who experienced discrimination were 5.67 times more likely to report encountering problems and challenges (assuming all other factors in the model are held constant). This effect is very similar to the impact of discrimination on experiences of abuse and exploitation (reviewed below).

#### **Significant predictor: Knowing where to seek assistance**

Among the variables (indicators of vulnerability) assessed, knowing where to seek assistance emerged as a significant predictor. The odds ratio (OR) for this indicator was 0.50 (95% CI: 0.33-0.76,  $p = 0.001$ ), indicating that refugees who knew where to seek assistance were less likely (by half) to experience problems and challenges (assuming all other factors in the model are held constant).

#### **Significant predictor: Not having funds to cover living expenses**

Among the variables (indicators of vulnerability) assessed, not having funds to cover living expenses emerged as a significant predictor. The odds ratio (OR) for this indicator was 2.25 (95% CI: 1.53-3.31,  $p < 0.001$ ), indicating that refugees who did not have sufficient funds to cover living expenses were 2.25

times more likely to encounter challenges on their journey. However, it should be noted that “money” is also one of the common challenges that respondents reported, so some of the predictive power of this variable (i.e. having the funds or not) might be explained by the overlap in the framing of the questions.

Despite the overall low predictive power of this model, some indicators appear important in predicting the likelihood of experiencing problems and challenges. Notably, a set of three situational vulnerability indicators including experiencing discrimination, knowing where to seek assistance and financial capacity proved to be significant predictors, highlighting their critical role in influencing refugees’ experiences despite the overall variance explained by the model being limited.

#### **Personal and Situational Vulnerability indicators**

**Model overview:** A logistic regression was performed to assess the combined effects of personal and situational vulnerability indicators on the likelihood of experiencing problems and challenges since leaving Ukraine. The valid sample size for this analysis is  $n = 573$  ( $n = 263$  with no experience of challenges;  $n = 310$  with at least some challenges experienced).

**Table 8: Situational vulnerability indicators predicting likelihood of experiencing problems and challenges since leaving Ukraine**

	B	S.E.	Wald	df	Sig.	OR	95% C.I. OR	
							Lower	Upper
<b>Funds to cover living expenses</b>	0.81***	0.20	17.02	1	< 0.001	2.25***	1.53	3.31
<b>Employment</b>			0.26	2	0.879			
<b>(Self-)employed vs. retired/student</b>	-0.08	0.20	0.155	1	0.694	0.93	0.63	1.36
<b>(Self-)employed vs. unemployed</b>	0.02	0.25	0.01	1	0.924	1.02	0.63	1.66
<b>Accommodation type</b>	0.32	0.21	2.41	1	0.121	1.38	0.92	2.07
<b>Know where to seek assistance</b>	-0.69***	0.21	10.73	1	0.001	0.50***	0.33	0.76
<b>Discrimination experience</b>	1.74***	0.26	43.83	1	< 0.001	5.67***	3.39	9.48
<b>Constant</b>	-0.26	0.16	2.74	1	0.098	0.77		

Notes: \*\*\*  $p < 0.001$ .

The logistic regression model was statistically significant,  $\chi^2(10) = 76.68$ ,  $p < 0.001$ , which means that the model fits the data well. The model explained 17 per cent (Nagelkerke R<sup>2</sup>) of the variance in the experience of problems and challenges since leaving Ukraine. It correctly classified 64 per cent of cases.

There are several predictors that remain significant when all vulnerability indicators are combined: age (personal vulnerability), marital status (personal vulnerability), having the funds to cover expenses (situational vulnerability), and the experience of discrimination (situational vulnerability; see [Table 9](#) for all effects). Interestingly, the significance of knowing where to seek help diminishes in this combined model.<sup>44</sup>

#### Significant predictor: Discrimination experience

Among the variables (indicators of personal and situational vulnerabilities) assessed, experience of discrimination remains a significant predictor. The odds ratio (OR) for experiencing discrimination (assuming all other in the model are held constant) was 6.64 (95% CI: 3.70–11.92,  $p < 0.001$ ), indicating that refugees who experienced discrimination were 6.64 times more likely to report encountering problem and challenges.

#### Significant predictor: Not having funds to cover living expenses

Among the variables (indicators of vulnerability) assessed, not having funds to cover living expenses emerged as a significant predictor. The odds ratio (OR) for this indicator

**Table 9: Personal and situational vulnerability indicators predicting the likelihood of encountering problems and challenges since leaving Ukraine**

	B	S.E.	Wald	df	Sig.	OR	95% C.I. OR	
							Lower	Upper
Age	0.02*	0.01	4.94	1	0.026	1.02*	1.002	1.03
Gender	0.06	0.28	0.05	1	0.832	1.06	0.62	1.83
Marital status	0.45*	0.22	4.15	1	0.042	1.57*	1.02	2.43
Travelling with kids	0.27	0.22	1.54	1	0.214	1.32	0.85	2.03
Funds	0.52	0.22	5.94	1	0.02	1.69*	1.11	2.57
Employment vulnerability			2.11	2	0.348			
(Self-)employed vs. retired/student	0.02	0.22	0.004	1	0.947	1.02	0.66	1.57
(Self-)employed vs. unemployed	0.36	0.27	1.69	1	0.194	1.43	0.84	2.43
Accommodation	0.31	0.26	1.43	1	0.232	1.36	0.82	2.24
Know where to seek assistance	-0.36	0.24	2.25	1	0.133	0.70	0.44	1.12
Discrimination	1.89***	0.30	40.27	1	< 0.001	6.64***	3.70	11.92
Constant	-1.36	0.45	9.24	1	< 0.001	0.26		

Note: \*\*\*  $p < 0.001$ .

44. When combining logistic regression models or adding multiple factors, the significance of an indicator may diminish due to multicollinearity, the adjustment for confounding variables, redistribution of explanatory power, more accurate reflection of effects across added variables, and decreased statistical power due to increased model complexity and insufficient sample size.



was 1.69 (95% CI: 1.11–2.57,  $p = 0.02$ ), indicating that refugees who did not have sufficient funds to cover living expenses were 1.69 times more likely to encounter challenges on their journey. However, similarly to the above analysis of the situational vulnerability indicators, it should be noted that “money” is also one of the common challenges that respondents reported, so some of the predictive power of this variable (i.e. having the funds or not) might be explained by the overlap in the framing of the questions.

#### **Significant predictor: Marital Status**

Among the variables (indicators of vulnerability) assessed, marital status emerged as a significant predictor. The odds ratio (OR) for being single, widowed or divorced, compared with being married or partnered, was 1.57 (95% CI: 1.02–2.43,  $p = 0.042$ ), indicating that single, divorced or widowed refugees were 57 per cent more likely to experience problems and challenges than married or partnered refugees (assuming all other factors in the model are held constant).

#### **Significant predictor: Age**

Among the variables (indicators of vulnerability) assessed, age emerged as a significant predictor. The odds ratio (OR) for age was 1.02 (95% CI: 1.002–1.03,  $p = 0.026$ ), indicating that with each additional year of age, the odds of encountering problems and challenges increase by 2 per cent (assuming all other factors in the model are held constant).

In this combined model, being older, single (widowed or divorced), lacking the funds to make ends meet and having experi-

enced discrimination are all associated with an increased likelihood of encountering challenges along the way. The largest effect is that of discrimination experience, with refugees who felt they were treated unfairly being 6.64 times more likely to report challenges.

### **B. Personal and Situational Vulnerability, and Experiences of Abuse, Violence and Exploitation by Ukrainian Refugees in Poland and Romania**

The aim of the analysis reported here is to determine the extent to which a range of Personal and Situational Vulnerability indicators, included in the DTM NIS, can predict the likelihood of Ukrainian refugees reporting experiences of abuse, violence and exploitation as assessed by their responses to a series of questions in the “CT Module – Abuse, Violence and Exploitation” of the DTM NIS.

**Table 10** displays the percentage of refugees who answered “yes” to each question in this module. The overall percentage of respondents reporting any kind of experiences of exploitation and abuse is low; the most common experience involves working without receiving the expected payment ( $n = 39$ , 5%), followed by deception to induce travel or movement ( $n = 21$ , 3%). When considering the number of experiences reported per person, 89 per cent of the sample ( $n = 674$ ) reported no experiences of exploitation, while 10 per cent ( $n = 75$ ) reported at least one, with the number of experiences per person ranging from 1 to 4. Only 0.8 per cent ( $n = 6$ ) of the sample did not answer any of these questions.

**Table 10: Responses to questions in the “CT Module – Abuse, Violence and Exploitation”:  
Percentage of refugees indicating “Yes” or “Prefer Not to Answer”**

	Yes (%)	PNTA (%)
Since you left Ukraine, have you worked or performed other activities without getting the expected payment?	39 (5.2%)	11 (1.5%)
Since you left Ukraine, have you been forced to perform work or other activities against your will?	4 (0.5%)	9 (1.2%)
Since you left Ukraine, have you been approached by someone offering marriage (for you or close family member – child or sibling)?	13 (1.7%)	8 (1.1%)
Since you left Ukraine, have you been kept at a certain location against your will (by persons other than the authorities of the country)?	1 (0.1%)	7 (0.9%)
Since you left Ukraine, have you experienced any form of physical violence?	4 (0.5%)	8 (1.1%)
Since you left Ukraine, did someone force you to travel/move onward to a new country/location?	11 (1.5%)	10 (1.3%)
Do you think you were deceived, tricked, manipulated, indebted, given false promises, or otherwise misled in order to get you to travel/move?	21 (2.8%)	8 (1.1%)
Have you always had your travel documents (your passport) with you or have access to them since you left Ukraine?	1 (0.1%)*	13 (1.7%)
Since you left Ukraine, have you personally met anyone from Ukraine who was identified as a victim of human trafficking by State authorities?^	4 (0.5%)	7 (0.9%)

Notes: \* This represents the number and percentage of respondents who said that someone else has/had them, which may be indicative of abuse, violence or exploitation; ^ This question was not included in the outcome variable of whether someone experienced abuse, violence or exploitation, since it does not refer directly to the respondent’s own experience.

For the purposes of these analyses, the experience of exploitation, abuse and violence is operationalized as a dichotomous variable: 0 represents respondents who report no such experiences, and 1 represents respondents who report at least one incident of abuse, violence or exploitation based on their responses to the CT Module questions above. The nature, scale/intensity and impact of the different experiences described by each question in this module cannot be distinguished within the context of the DTM NIS data collection, as respondents only indicated whether they experienced any of these situations. Although the questions allowed for comments and follow-up after a “yes” response, this follow-up was not mandatory and further details were not consistently provided by the respondents.

### Personal Vulnerability Indicators

The first logistic regression analysis tests the power of the following personal vulnerability indicators (as recorded by the DTM NIS) in distinguishing between refugees who have reported experiencing abuse, violence and exploitation and those who have not: (a) age, (b) gender, (c) marital status and (d) travelling with children (see [Table 11](#)).

The analysis will exclude any participant with missing values on any of the variables of interest. For this reason, a chi-square test of independence was performed to evaluate whether having missing values (or “missingness”) was associated with a higher probability of having experienced abuse, violence and exploitation. A chi-square test of independence was performed to evaluate the relationship between “missingness” and experiences of exploitation and abuse. The relationship between these variables was

**Table 11: Personal vulnerability indicators predicting likelihood of having experienced abuse, violence and exploitation**

	B	S.E.	Wald	df	Sig.	OR	95% C.I. OR	
							Lower	Upper
Age	-0.03*	0.01	6.24	1	0.016	0.97*	0.94	0.99
Gender (female)	0.35	0.47	0.56	1	0.454	1.42	0.57	3.52
Marital status (single, widowed, divorced)	0.99***	0.29	11.46	1	<0.001	2.68***	1.52	4.75
Health needs (yes)	0.02	0.30	0.01	1	0.938	1.02	0.57	1.85
Travelling with children (yes)	0.31	0.36	0.71	1	0.401	1.36	0.67	2.77
Constant	-1.88	0.65	8.29	1	0.004	0.15		

Notes: \*  $p < 0.05$ , \*\*\*  $p < 0.001$ .

not significant,  $\chi^2(1, 749) = 2.03$ ,<sup>45</sup>  $p = 0.154$ , indicating that “missingness” is not associated with a higher probability of having experienced abuse, violence and exploitation.

An independent t-test was performed to test whether those with missing values were significantly younger or older compared to those with complete values. The results showed a significant difference,  $t(154.75) = -2.46$ ,  $p = 0.015$ ; those excluded from the analysis due to missing values tended to be significantly older ( $M_{age} = 44.13$ ,  $SD = 17.04$ ) than those included in the analysis ( $M_{age} = 40.21$ ,  $SD = 12.54$ ).

A chi-square test of independence was performed to evaluate the relationship between “missingness” and gender distribution. The relationship between these variables was significant,  $\chi^2(1, 755) = 16.37$ ,  $p < 0.001$ . Those respondents with missing data were more likely to be male compared with those with non-missing data.

The distribution of types of abuse, violence and exploitation experienced was also examined separately for those with missing and non-missing data; the distribution mirrored

that in the entire sample with “working without getting the expected payment” being the most common experience (57% of people who reported at least one experience of exploitation reported “employment exploitation”).

**Model Overview:** A logistic regression was performed to assess the effects of age; gender; marital status; travelling with children; and health needs<sup>46</sup> on the likelihood of experiencing abuse, violence and exploitation. The valid sample size for this analysis is  $n = 623$  ( $n = 565$  with no experience of abuse, violence and exploitation;  $n = 58$  with at least one reported experience). The logistic regression model was statistically significant,  $\chi^2(5) = 18.32$ ,  $p = 0.003$ , which means that the model fits the data well. However, the model has low predictive power, with a Nagelkerke  $R^2$  value of 0.06, suggesting that, overall, this model captures only a small proportion of the variance in the experience of abuse, violence and exploitation; while it correctly classified 91 per cent of cases, it failed to predict correctly the percentage of those who experienced abuse, violence and exploitation.

45. N here is 749 as there are 6 respondents with missing data across all CT questions.

46. “Health needs” were not included as a predictor or indicator of personal vulnerability in the previous section’s analysis of encountering problems and challenges, since “health problems” were listed as one of the challenges (as an “outcome” variable).

Similarly to the assessment of personal vulnerability indicators and refugees' experiences of problem and challenges, the low predictive power of the model suggests that while some predictors are statistically significant, they do not account for a large portion of the variance in the outcome. This may be due to factors such as noise in the data, unaccounted variables that are also influential, or intrinsic unpredictability of the outcome based on the variables included. In this context, it could well be anticipated that this logistic regression model would explain only a small percentage of the variance, owing to the inclusion of only a limited number of predictor variables. This model primarily focuses on how fundamental characteristics such as gender and age interact with the likelihood of experiencing abuse, violence and exploitation. It does not explore interactions between variables, therefore not accounting for the intersectionality of characteristics such as gender and age. Consequently, while this model provides a foundational understanding, it also highlights the need for further research, which could investigate additional indicators and, potentially, offer a more nuanced understanding of the factors contributing to vulnerability.

#### **Significant predictor: Age**

Among the variables (indicators of vulnerability) assessed, age emerged as a significant predictor. The odds ratio (OR) for age was 0.97 (95% CI: 0.94–0.99,  $p = 0.016$ ), indicating that with each additional year of age, the odds of encountering abuse, violence and exploitation decrease by 3 per cent (assuming all other factors in the model are held constant).

#### **Significant predictor: Marital Status**

Among the variables (indicators of vulnerability) assessed, marital status emerged as a significant predictor. The odds ratio (OR) for being single, widowed or divorced, compared to being married or partnered, was 2.68 (95% CI: 1.52–4.75,  $p < 0.001$ ), indicating that single, divorced or widowed refugees were 2.68 times more likely to report experiencing abuse,

violence and exploitation than married or partnered refugees (assuming all other factors in the model are held constant).

The personal vulnerability model, which considers only the impacts of age, gender, marital status, health needs and travelling with children, shows overall low predictive power. This limitation could be attributed to several factors: the inclusion of only a limited number of personal vulnerability factors, the assumption that these factors equally influence the experiences of challenges and problems, and the difficulty in quantifying intersectionality – the interplay and overlap of different factors. Nevertheless, similar to findings from the analysis of the impact of personal vulnerability on refugees' likelihood of encountering problems and challenges, these results offer valuable insights into how age and marital status influence the likelihood of experiencing abuse, violence and exploitation in the context of displacement.

#### **Situational Vulnerability Indicators**

The second logistic regression analysis tested the power of the available (in the context of the DTM NIS) indicators of situational vulnerability in discriminating between those refugees who reported experiencing abuse, violence and exploitation and those who did not. These indicators include: (a) having the funds to cover expenses, (b) employment status, (c) accommodation type, (d) legal or migration status, (e) number of top needs, (f) know where to seek assistance for help, (g) difficulty in receiving support and (h) experiences of discrimination. However, two indicators were removed from this model for the following reasons:

- “Legal or Migration status” features a significant number of missing data points, with only four respondents lacking EU\_TP/Refugee status; this variable was excluded due to insufficient cases for a robust estimate of its effect.

“Experiencing difficulty in accessing support” has 51 per cent missing values, which drastically reduces the sample size. It has been excluded in the context of this analysis.

As with the personal vulnerability analysis, a comparison was conducted between those excluded from the analysis due to missing values on these variables and those who were not, to determine whether they differ in terms of reporting experiences of abuse, violence and exploitation.

A chi-square test of independence was performed to evaluate the relationship between ‘missingness’ and experiences of exploitation, violence and abuse. The relationship between these variables was not significant,  $\chi^2(1, 749) = 0.092$ ,<sup>47</sup>  $p = 0.762$ . This result reassures that “missingness” is not associated with a higher probability of having experienced exploitation, violence and abuse.

An independent t-test was performed to test whether those with missing values were significantly younger or older compared with those with complete values. The results showed a significant difference,  $t(99.48) = 3.43$ ,  $p < 0.001$ : those who were excluded from the analysis due to missing values tended to be significantly younger ( $M_{age} = 36.96$ ,  $SD = 9.47$ ) than those who were included in the analysis ( $M_{age} = 41.26$ ,  $SD = 13.75$ ).

A chi-square test of independence was performed to evaluate the relationship between “missingness” and gender distribution. The relationship between these variables was significant,  $\chi^2(1, 755) = 12.32$ ,  $p < 0.001$ . Those respondents with missing data were more likely to be males, compared with those with non-missing data.

The distribution of types of reported experiences of abuse, violence, and exploitation was examined separately for those with missing

and non-missing data. The distribution of responses mirrors that in the entire sample with ‘working without getting the expected payment’ being the most common experience. The above analyses suggest that respondents with missing data on the situational vulnerability indicators are significantly younger and more likely to be male. However, in neither case are the respondents with missing data significantly more or less likely to have experienced abuse, violence, and exploitation.

**Model overview:** A logistic regression was performed to assess the effects of: funds to cover expenses; employment status; accommodation type; number of top needs;<sup>48</sup> know where to seek assistance for help; difficulty in receiving support; and experiences of discrimination on the likelihood of experiencing abuse, violence and exploitation. The valid sample size for this analysis is  $n = 686$  ( $n = 618$  with no experience of abuse, violence and exploitation;  $n = 68$  with at least one reported experience). The logistic regression model was statistically significant,  $\chi^2(7) = 89.13$ ,  $p < 0.001$ , which means that the model fits the data well. The model explained only 26 per cent (Nagelkerke  $R^2$ ) of the variance in the experience of abuse, violence and exploitation. It correctly classified 90 per cent of cases; however, it correctly predicted only 12 per cent of those who did experience abuse, violence and exploitation.

A number of significant predictors of the likelihood of experiencing abuse, violence and exploitation were identified (while keeping all other indicators of situational vulnerability constant): employment status, number of top needs and the experience of discrimination (see [Table 12](#) for all results).

47.  $N = 749$  here as there are 6 respondents with missing data across all CT questions.

48. One of the DTM NIS questions asked participants to identify their “top main needs at the moment” from a choice of 23 specific options, plus an “other” category.

**Table 12: Situational Vulnerability indicators predicting likelihood of having experienced abuse, violence and exploitation**

	B	S.E.	Wald	df	Sig.	OR	95% C.I. OR	
							Lower	Upper
<b>Funds to cover living expenses</b>	0.19	0.35	0.30	1	0.587	1.21	0.61	2.39
<b>Employment</b>			12.92	2	0.002			
<b>(Self-)employed vs. retired/student</b>	-1.13***	0.35	10.54	1	0.001	0.32***	0.16	0.64
<b>(Self-)employed vs. unemployed</b>	-1.24*	0.49	6.27	1	0.012	0.29*	0.11	0.77
<b>Accommodation type</b>	0.48	0.35	1.89	1	0.170	1.61	0.82	3.17
<b>Number of top needs</b>	0.22***	0.05	22.45	1	< 0.001	1.24***	1.14	1.36
<b>Know where to seek assistance</b>	-0.42	0.40	1.13	1	0.287	0.65	0.30	1.43
<b>Discrimination experience</b>	1.97***	0.29	45.65	1	< 0.001	7.14***	4.04	12.64
<b>Constant</b>	-3.20	0.32	98.12	1	< 0.001	0.04		

Notes: \*\* p < 0.01, \*\*\* p < 0.001.

### Significant predictor: Discrimination experience

Among the variables (indicators of vulnerability) assessed, experience of discrimination emerged as a significant predictor. The odds ratio (OR) for experiencing discrimination was 7.14 (95% CI: 4.04–12.64, p < 0.001), indicating that refugees who experienced discrimination were 7.14 times more likely to report experiences of abuse, violence and exploitation (assuming all other factors in the model are held constant). This effect is very similar to the impact of discrimination on the likelihood of encountering problems and challenges since leaving Ukraine (reviewed above).

### Significant predictor: Being employed or self-employed

Among the variables (indicators of vulnerability) assessed, being employed or self-employed emerged as a significant predictor. The odds ratio (OR) for the indicator that compared employment/self-employment to being retired or a student was 0.32 (95% CI: 0.16–0.64, p = 0.001), indicating that refugees who were employed or self-employed were three times more likely to experience abuse, violence and exploitation than refugees who

were retired or who were students (assuming all other factors in the model are held constant). The odds ratio (OR) for the indicator that compared employment/self-employment to being unemployed was 0.29 (95% CI: 0.11–0.77, p = 0.012), indicating that refugees who were employed or self-employed were almost three times more likely to experience abuse, violence and exploitation than refugees who were unemployed (assuming all other factors in the model are held constant).

### Significant predictor: Number of top needs

Among the variables (indicators of vulnerability) assessed, number of top needs emerged as a significant predictor. The odds ratio (OR) for the number of top needs was 1.24 (95% CI: 1.14–1.36, p < 0.001), indicating that with each reported additional top need, the odds of encountering abuse, violence and exploitation increase by 24 per cent (assuming all other factors in the model are held constant).

Despite the modest predictive power of this model, some indicators were significant in predicting the likelihood of experiencing abuse, violence and exploitation. Notably, a set of three situational vulnerability indicators

**Table 13: Personal and situational vulnerability indicators predicting the likelihood of experiencing abuse, violence and exploitation**

	B	S.E	Wald	df	Sig	OR	95% C.I. OR	
							Lower	Upper
Age	-0.03*	0.02	4.35	1	0.037	0.97*	0.94	0.998
Gender	0.41	0.54	0.56	1	0.453	1.50	0.52	4.36
Marital status	0.96***	0.35	7.59	1	0.006	2.62***	1.32	5.19
Health conditions	-0.37	0.37	1.04	1	0.307	0.69	0.34	1.41
Travelling with kids	0.04	0.44	0.008	1	0.931	1.04	0.44	2.45
Funds	0.28	0.39	0.51	1	0.474	1.32	0.62	2.85
Employment vulnerability			3.40	2	0.18			
(Self-)employed vs. retired/student	-0.60	0.39	2.32	1	0.128	0.55	0.26	1.19
(Self-)employed vs. unemployed	-0.85	0.57	2.24	1	0.135	0.43	0.14	1.30
Accommodation	0.43	0.44	0.94	1	0.333	1.53	0.65	3.62
Number of top needs	0.29***	0.06	27.19	1	<0.001	1.33***	1.20	1.49
Know where to seek assistance	-0.56	0.52	1.16	1	0.28	0.57	0.20	1.59
Discrimination	1.97***	0.36	30.72	1	< 0.001	7.18***	3.58	14.42
Constant	-3.18	0.88	12.91	1	< 0.001	0.04		

Notes: \*  $p < 0.05$ , \*\*\*  $p < 0.001$ .

including experiencing discrimination, employment status, and the number of top needs proved to be significant predictors, highlighting their critical role in influencing refugees' experiences.

### Personal and Situational Vulnerability indicators

**Model overview:** A logistic regression was performed to assess the combined effects of personal and situational vulnerability indicators on the likelihood of experiencing abuse, violence and exploitation. The valid sample size for this analysis is  $n = 556$  ( $n = 513$  with no experience of abuse, violence and exploitation,  $n = 43$  with at least one reported experience). The logistic regression model was statistically significant,  $\chi^2(12) = 88.39$ ,  $p < 0.001$ , which means that the model fits the data well. The

model explained 31 per cent (Nagelkerke  $R^2$ ) of the variance in the experience of abuse, violence and exploitation. It correctly classified 92 per cent of cases; however, it correctly classified only 19 per cent of those who did experience abuse, violence and exploitation.

There are a number of predictors that continue to be significant when all vulnerability indicators are combined: age (personal vulnerability), marital status (personal vulnerability), number of top needs (situational vulnerability) and the experience of discrimination (situational vulnerability) – see [Table 13](#) for all effects. Interestingly, employment status is no longer significant once the effects of personal vulnerability indicators are taken into account.<sup>49</sup>

49. When combining logistic regression models or adding multiple factors, the significance of an indicator may diminish

**Significant predictor: Discrimination experience**

Among the variables (indicators of personal and situational vulnerabilities) assessed, experience of discrimination remains a significant predictor and has the largest effect. The odds ratio (OR) for experiencing discrimination (assuming all other factors in the model are held constant) was 7.18 (95% CI: 3.58–14.42,  $p < 0.001$ ), indicating that refugees who experienced discrimination were 7.18 times more likely to report experiencing abuse, violence and exploitation.

**Significant predictor: Marital Status**

Among the variables (indicators of vulnerability) assessed, marital status emerged as a significant predictor. The odds ratio (OR) for being single, widowed or divorced, compared with being married or partnered, was 2.62 (95% CI: 1.32–5.19,  $p = 0.006$ ), indicating that single, divorced or widowed refugees were more than 2.5 times more likely to experience abuse, violence and exploitation than married or partnered refugees (assuming all other factors in the model are held constant).

**Significant predictor: number of top needs**

Among the variables (indicators of vulnerability) assessed, number of top needs emerged as a significant predictor. The odds ratio (OR)

for the number of top needs was 1.33 (95% CI: 1.20–1.49,  $p < 0.001$ ), indicating that with each reported additional top need, the odds of encountering abuse, violence and exploitation increase by 33 per cent (assuming all other factors in the model are held constant).

**Significant predictor: Age**

Among the variables (indicators of vulnerability) assessed, age emerged as a significant predictor. The odds ratio (OR) for age was 0.97 (95% CI: 0.94–0.998,  $p = 0.037$ ), indicating that with each additional year of age, the odds of encountering abuse, violence and exploitation decreased by 3 per cent (assuming all other factors in the model are held constant).

In this combined model, being younger, single (widowed or divorced), having multiple needs and having experienced discrimination are all associated with an increased likelihood of experiencing abuse, violence or exploitation. The most significant impact is from experiences of discrimination, with refugees who reported such experiences being 7.18 times more likely to report abuse, violence and exploitation, as assessed by their responses to a specific set of questions included in the DTM NIS.

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due to multicollinearity, the adjustment for confounding variables, redistribution of explanatory power, more accurate reflection of effects across added variables, and decreased statistical power due to increased model complexity and insufficient sample size.



# APPENDIX III: PROTECTION MODULE IN NEEDS AND INTEGRATION SURVEYS DEPLOYED IN POLAND AND ROMANIA

## Problems

Since you left Ukraine, have you or your family members with you faced any problems/ challenges?

- a) Yes
- b) No
- c) Declined response

If yes, what type of problems?

- a) Robbery
- b) Lost/stolen documents
- c) No shelter/place to sleep
- d) Health problems (please specify)
- e) Financial problems (lack of money to buy basic necessities)
- f) Hunger
- g) Attacks/threats by others
- h) Other, specify \_\_\_\_\_

If YES; where did it happen?

- a) Here (in the country where survey is conducted)
- b) While in transit If in transit, specify  
Country \_\_\_\_\_ Location \_\_\_\_\_

## Module – indicators of abuse, violence, exploitation

Since you left Ukraine, have you worked or performed other activities without getting the expected payment?

- a) Yes
- b) No
- c) Declined response

If YES, at which point since you left Ukraine did this take place?

Country 1: \_\_\_\_\_  
Location 1: \_\_\_\_\_ Location 2: \_\_\_\_\_

If YES, which kind of job /activity? \_\_\_\_\_

Since you left Ukraine, have you been forced to perform work or other activities against your will?

- a) Yes
- b) No
- c) Declined response

If YES, at which point since you left Ukraine did this take place?

Country 1: \_\_\_\_\_  
Location 1: \_\_\_\_\_ Location 2: \_\_\_\_\_

If YES, which kind of job /activity? \_\_\_\_\_

Since you left Ukraine, have you been approached by someone offering marriage (for you or close family member – child or sibling)?

- a) Yes
- b) No
- c) Declined response

If YES, at which point since you left Ukraine did this take place?

Country 1: \_\_\_\_\_  
Location 1: \_\_\_\_\_ Location 2: \_\_\_\_\_

Since you left Ukraine, have you been kept at a certain location against your will (by persons other than the authorities of the country)?

- a) Yes
- b) No
- c) Declined response

If YES, at which point since you left Ukraine did this take place?

Country 1: \_\_\_\_\_  
Location 1: \_\_\_\_\_ Location 2: \_\_\_\_\_

Since you left Ukraine, have you experienced any form of physical violence?

- a) Yes
- b) No
- c) Declined response

If YES, at which point since you left Ukraine did this take place?

Country 1: \_\_\_\_\_

Location 1: \_\_\_\_\_ Location 2: \_\_\_\_\_

If YES, what type of violence? (not mandatory – only add notes if the respondent says something without prompting him/her)

Since you left Ukraine, did someone force you to travel/move onward to a new country/location?

- a) Yes
- b) No
- c) Does not know
- d) Prefer not to answer

If YES, at which point since you left Ukraine did this take place?

Country 1: \_\_\_\_\_

Location 1: \_\_\_\_\_ Location 2: \_\_\_\_\_

Do you think you were deceived, tricked, manipulated, indebted, given false promises, or otherwise misled in order to get you to travel/move?

- a) Yes
- b) No
- c) Does not know
- d) Prefer not to answer

If YES, at which point since you left Ukraine did this take place?

Country 1: \_\_\_\_\_

Location 1: \_\_\_\_\_ Location 2: \_\_\_\_\_

If YES, how?

Have you always had your travel documents (your passport) with you or have access to them since you left Ukraine?

- a) Yes
- b) Never had any document
- c) I lost them
- d) Someone stole them from me
- e) Someone else has/had them
- f) Declined response

If NO, at which point since your left Ukraine did this take place?

Country 1: \_\_\_\_\_

Location 1: \_\_\_\_\_ Location 2: \_\_\_\_\_

If YES, please explain

Since you left Ukraine, have you personally met anyone from Ukraine who was identified as a victim of human trafficking by State authorities?

- a) Yes
- b) No
- c) Don't know
- d) Declined response

If YES, at which point since you left Ukraine did this take place?

Country 1: \_\_\_\_\_

Location 1: \_\_\_\_\_ Location 2: \_\_\_\_\_

If YES, who is this?

- a) Family member
- b) Friend
- c) Someone I don't know well
- d) Someone I work with
- e) Myself
- f) I don't know
- g) I prefer not to answer

### Employment section

Thinking to your current and past experiences since you left Ukraine, have you personally experienced any of the following problems at work?

- a) I was underpaid or not paid for my work
- b) I worked without a contract or with a contract that didn't cover all working hours
- c) I had to work very long hours (e.g. more than 8 hours/day, more than 40 hours/week)
- d) I couldn't take breaks/rest time
- e) There was no access to drinking water, food or a toilet
- f) I was not given protective gear when needed
- g) I couldn't communicate freely with other workers or anyone else (I was not allowed to)
- h) I experienced threats or violence by the employer
- i) Other, specify
- j) None of these
- k) Declined response

If yes, in which sector(s) of the economy did this happen? (drop down menu)

# APPENDIX IV: KEY INFORMANT INTERVIEWS: INTERVIEW QUESTIONS

## Interview Schedule

### CLARIFICATIONS ON TERMINOLOGY

- Using the term “refugees” generically, including:
  - Ukrainian nationals and TCNs who may have applied for a TP status in the EU country under the TDP;
  - Those who did not apply for a TP status, but may have lodged a humanitarian protection application; and
  - Those who did not apply for a TP status and did not lodge their humanitarian protection application.
- Aware of different legal implications, we will however be referring to “**refugees**” in the context of this interview.
- If there are different and specific factors of vulnerability affecting these different groups, please describe/clarify in your response.

#### **BLOCK 1: Current situation, current data, current vulnerabilities – focus on trafficking AND exploitation.**

**Q1:** So far, there are not as many Ukrainian refugees identified as victims of trafficking as originally feared. Is that still the case in Romania / Poland?

**Prompt:** Do you have any official data or any internal analysis of the situation?

**Intent:** Identify any data / internal research that can be used in the analysis.

#### **Q2: Thinking about Romanian / Polish context, what are the key reasons for this?**

**Intent:** Factors which prevented the increase in trafficking in this specific context.

#### **Q3: Could you describe the current situation of Ukrainian refugees in Romania / Poland, especially in relation to their vulnerabilities?**

**Prompt:** if not answered in Q1 - Do you have any data that have been collected in relation to the socioeconomic situation or vulnerability of Ukrainian refugees?

**Prompt:** If not, could you recommend any other agencies that collate such data?

**Intent:** Current issues and challenges and any data on this.

#### **Q4: How have these vulnerabilities evolved over time? What changes do you anticipate in the near future?**

**Intent:** How the situation changed/ changing or may change – what to anticipate.

#### **BLOCK 2: Responding to vulnerabilities.**

**Q5:** May not be needed if full answer is given for Q2 attributing low prevalence to government efforts: **How has the Romanian / Polish government’s emergency response addressed the vulnerabilities of Ukrainian refugees to human trafficking?**

Rephrase if not clear: **What is being done to prevent human trafficking among Ukrainian refugees?**

**Intent:** specific anti-trafficking measures at the national level.

**Q6:** If exploitation not mentioned before, remark that labour exploitation can happen outside of /without trafficking, hence a question about labour exploitation: **Are there any specific measures to address the vulnerabilities of Ukrainian refugees to labour exploitation? Sexual exploitation? Other types of exploitation (including forced criminality / forced marriage)?**

**Intent:** specific measures to prevent/address labour exploitation at the government level.

**Q7: What coordination is there with NGOs and international organizations to protect against such risks?**

**Intent:** current cooperation with external agencies, the extent to which this is seen as a structural/multi-agency issue.

### **BLOCK 3: Temporary Protection Regime: now and once/if withdrawn.**

**Q8:** May have been touched upon / discussed; clarify that there is a specific block of questions on TPD and the impact of the EU-level protection regime.

**Can you talk about the impact of the TPD on the situation of Ukrainian refugees in Romania / Poland? In your view, how may the grant of this status (including the right to travel, work, access to health care, education etc.) have reduced the vulnerability of refugees to human trafficking?**

**Intent:** views on the impact of the EU TPD.

**Q9: How has the protraction of the war affected this support? Has the level of socioeconomic support been increasing, remained at the same level, or been reducing?**

**Intent:** changes to the levels of support – as factors reducing or increasing vulnerability to exploitation/trafficking.

**Q10: Are there particular groups of Ukrainian refugees who are not**

**covered by the TP regime, or any specific groups who are particularly vulnerable to human trafficking and/or exploitation? (including children, Roma, LGBTQ+, persons with disabilities, women with care responsibilities – who need to balance care responsibilities with the need to earn income etc.)**

**Prompt:** men crossing Ukrainian–Romanian / Polish border trying to evade military service; or TCNs.

**Q11: What is being done to respond to their specific situation and address the needs and protection of these individuals (those in vulnerable groups)?**

**Intent [Q9 & Q10]:** examples of specific vulnerable groups and any specific measures.

**Q12: How is the Romanian / Polish government preparing (or should be preparing) for the eventual withdrawal of the TP in terms of continued support and protection for Ukrainian refugees?**

**Intent:** how to address dormant vulnerability linked to the status / access to welfare.

### **Block 4: Overall and concluding.**

**Q13: What are the biggest challenges the ministry/agency faces in ensuring the continued safety and protection of Ukrainian refugees?**

**Intent:** current challenges – opportunity to conclude.

**Q14: Is there anything else that I should have asked but did not; or anything that you would like to add in relation to human trafficking and refugees from Ukraine?**

**Is there anyone who you think we need to talk to?**

# APPENDIX V: AGENCIES AND ORGANIZATIONS REPRESENTED IN KEY INFORMANT INTERVIEWS CONDUCTED IN POLAND AND ROMANIA

This list represents general interview questions; however, the questions were adapted or edited based on the specific role and function of the agency or organization represented by the key informants.

The country visit to Romania took place between 26 and 30 November and, in addition to meetings in Bucharest, included a visit to the Romania/Ukraine border crossing point (BCP) in Isaccea to meet with the IOM enumerators team stationed at the border, as well as a visit to Galati to interview an IOM enumerator based there. Interviews were held with representatives of:

- The National Agency Against Trafficking in Persons (ANITP)
- The Directorate for Combating Organized Crime (DCCO)
- The General Inspectorate of Border Police
- eLiberare
- ADPARE
- IOM Displacement Tracking Matrix survey enumerators
- IOM in-country staff

The country visit to Poland took place between 17 and 21 December and, in addition to interviews in Warsaw, included a visit to Krakow to meet with the IOM enumerators based in the Krakow office. Interviews were held with representatives of:

- The Border Guard General Headquarters
- The National Police Headquarters
- The National Consulting and Intervention Centre for the Victims of Trafficking
- La Strada Poland
- IOM Displacement Tracking Matrix survey enumerators
- IOM in-country staff

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