



# THE STOP THE TRAFFIK GROUP

## UKRAINE UPDATE APRIL REVIEW

6 MAY 2022

# RELEVANT BACKGROUND

The STOP THE TRAFFIK Group has a strong history of delivering activity with vulnerable communities that reduces their risk of being trafficked into exploitation. In the current crisis, we are working with a range of ground partners to produce this analysis.

We know from observing timelines with large unpredictable groups of people on the move (Rohingya and Syria) that initially they are subject to high levels of short term assistance. Then as they settle, the trafficking operations begin to create structures to encourage higher value individuals to go on a journey by promising them hope of a good opportunity that is exploitation. Timelines are difficult to predict, but at this point, it is not clear whether trafficking groups are organised in those refugee communities yet.

## INTELLIGENCE FOR BUSINESSES

### SECTORS LIKELY TO BE AT RISK

Given that women and unaccompanied minors disproportionately make up the population fleeing Ukraine, this places sex trafficking as a likely form of exploitation. Men have their own unique risks due to their migration out of Ukraine being illegal because of Ukrainian martial law, this will likely lead them into exploitative manual roles. Furthermore, our intelligence has found that recruitment agencies are being created that legally recruit and place refugees into legitimate work, but exploit them by confiscating their wages.

### SECTORS LIKELY TO BE AT RISK



MANUAL LABOUR



CLEANING



CARE OF THE  
ELDERLY



MANUFACTURING

#### AGRICULTURE SECTOR RISKS

Ukrainians have been exploited within this sector prior to the invasion. We will likely see more people displaced from Ukraine exploited as Southern Europe's picking season is coming soon. This can be remediated by increased due diligence around recruitment practices.

#### HOSPITALITY SECTOR RISKS

Hotels and hospitality facilities were exposed to high-risk of sex trafficking taking place on their premises prior to the invasion. The current increased risk can be remediated by increased due diligence like awareness training and strengthening internal reporting mechanisms.

### FINANCIAL INSTITUTION RISKS

Financial institutions have been reducing the documentation requirements to allow for displaced people to create bank accounts more easily. However, this presents the risk of individuals [exploiting](#) these special circumstances for illicit gains. Risks for financial institutions could be remediated by incorporating trafficking and exploitation financial typologies into transaction monitoring and KYC practice.

## REFUGEE RIGHTS IN COUNTRIES SURROUNDING UKRAINE

The STOP THE TRAFFIK Group has conducted an assessment of the rights afforded to refugees in the countries they are fleeing to. From this, we have identified potential risks of exploitation that businesses need to pay attention to. Overall, business due diligence needs to be focused on new arrivals from Ukraine in the aforementioned sectors, whether they hold Ukrainian citizenship or not.

### POLAND

While [many rights](#) are afforded Ukrainian citizens such as being able to stay and work in Poland without a work permit, due diligence will need to be focused on third-country nationals displaced from Ukraine as it is unclear whether these rights extend to them too.

### HUNGARY

Despite [granting visa-free entry](#) to Ukrainian and third-country nationals fleeing from Ukraine, work permits are still required here, despite a now simplified process. Due diligence needs to be maintained for newly arrived Ukrainians working in Hungary.

### ROMANIA

Romania has allowed Ukrainian refugees [to work without a permit](#). Based on our intelligence, particular due diligence on the border regions with Ukraine is needed as many displaced peoples are staying close to the border in hopes of returning to Ukraine.

### MOLDOVA

The country is currently struggling with the influx of refugees, no clear information has been found on refugee working rights here. Hospitality businesses need specific due diligence for sex trafficking based on historic intelligence, especially in Transnistria and Gagauzia Autonomous Territory.

### SLOVAKIA

While Ukrainians are allowed to enter without a visa and stay for up to 90 days, Ukrainians are not allowed to work during short-term residence in the country. Due diligence needs to be maintained for new arrivals from Ukraine working in Slovakia.

## GERMANY

Temporary protection [can be obtained](#) by Ukrainian nationals, stateless persons, and nationals of third countries other than Ukraine. This is provided they benefitted from international/national protection and have been in Ukraine prior to 24th February 2022. Despite this, those who obtain temporary protection must still apply for work permits (self-employed people are exempt from this), hence due diligence is still needed for new arrivals to Germany.

## AUSTRIA

Ukrainians can enter the country on a humanitarian case-by-case basis if they do not hold a biometric passport, however both Ukrainian and third-country nationals still [need work permits](#) to be employed in the country. Due diligence needs to be focused on new arrivals.

## RECOMMENDATIONS FOR BUSINESSES:

### OPERATING IN COUNTRIES DISPLACED PEOPLE ARE FLEEING TO

#### **Maintain business due diligence**

Ensure that modern slavery and human rights policies are adhered to by suppliers across (new) supply chains established. Particular focus should be on recruitment agencies practices and modern slavery awareness training for staff.

#### **Utilise enhanced auditing on suppliers**

Use human rights experts in audits to discern subtle exploitation signs by assessing the workplace and asking questions around how workers found their roles and what the recruitment process was (worker journey).

N.B: Please contact the [STOP THE TRAFFIK Group here](#) if you would like advice on business due diligence in high risk regions.

# EMERGENCY RESPONSE:

## PREVENTING THE TRAFFICKING OF THOSE IMPACTED BY THE CONFLICT IN UKRAINE

### THE NEED:

As of 26th April, the UN says, [more than 5 million people](#) have already fled Ukraine since Russia invaded. Refugees are crossing into neighbouring [countries to the west](#), such as Poland, Romania, Slovakia, Hungary, and Moldova; with women & children making up the largest proportion of Ukrainian refugees on the move. It is thought that approximately 6.5 million people are displaced inside Ukraine.

**CAMPAIGN REACH TO-DATE ACROSS PHASES 1 AND 2:  
1.6+ MILLION PEOPLE**

### CAMPAIGN PHASE 1: 24TH MARCH 2022 - 27TH APRIL 2022

STOP THE TRAFFIK and Traffik Analysis Hub have launched a Europe-wide digital prevention campaign that will provide vital safety information to those who are on the move as a result of the conflict in Ukraine.

'TRAVEL SAFE, STAY SAFE', the first of a series of prevention campaigns, seeks to bring immediate preventative information into the hands of those at high risk of exploitation. The campaign targets countries across Europe including Romania, Latvia, Poland, Moldova, Hungary, and Austria in three languages: English, Ukrainian and Russian.

*NB: The information on these pages has now been incorporated onto the landing page for Campaign Phase 2.*

### CAMPAIGN PHASE 2: 14TH APRIL 2022 - ONGOING

"TRAVEL SAFE, WORK SAFE", the second in the series of prevention campaigns, continues to target the countries across Europe from Campaign Phase 1 alongside the places we believe people will move to settle, such as Germany. This campaign focuses on providing people with crucial safety information as they seek work, financial means, or community integration. This is another stage when traffickers will try to exploit and so our presence at this time is essential.

#### UK Specific Campaign Phase 2 Landing Page:

This page will be linked to adverts targeting the UK only. This page will contain the same information as the regular Campaign Phase 2 landing page, however, there will be an additional line that states the following: *"If you are already in the UK and looking for support, click here"*.

If clicked, viewers will reach the UK-focused landing page of Campaign Phase 2, "STAY SAFE IN THE UK", which is built in collaboration with [Hope for Justice](#). This page will provide a directory of information on where individuals can find support in the UK if they have been displaced from Ukraine because of the war.

# EMERGENCY RESPONSE

## OUR CAMPAIGN REACH SO FAR:

Our campaign in phase 1 and 2 has targeted the following countries:



\*These figures do not account for potential duplication of audience.

## PARTNERING WITH THE INTERNATIONAL COMPLIANCE ASSOCIATION

The STOP THE TRAFFIK Group is working with the International Compliance Association (ICA) to create joint scholarships for courses on Anti-Money Laundering.

These scholarships will be opened up for displaced people, especially from Ukraine and Afghanistan. These resources will be available for English and Arabic speakers to help rebuild their lives. Further details will be made available soon.

## CALL TO ACTION

1

Support our work by becoming a business that The STOP THE TRAFFIK Group can collaborate with and signpost to for support and legitimate employment opportunities for those who have had to flee because of the conflict. This reduces the re-trafficking of victims and gives individuals an opportunity for independence. [You can do so by contacting us here.](#)

2

Have all employees download The STOP APP on their phones to report all cases of suspected trafficking to The STOP THE TRAFFIK Group to enhance prevention efforts.

3

Provide CV support, language classes, and job application support for displaced people

4

Offer funding for The STOP THE TRAFFIK Group digital programs.

Use business to support refugees through a variety of methods:

5

- Choose a charity to collaborate with and begin a fundraising campaign.
- Offer support to fund crucial services that refugees are in need of, such as housing, transport, and food.

## BEFORE YOU GO...

The work that The STOP THE TRAFFIK Group does not work in isolation.

Our prevention campaigns, business consultancy, and advocacy work requires the support from those with shared values to ours.

There are multiple ways you can help, both financially and otherwise:



### Where can I send help?

1 If you are interested in being a business we could signpost to for support/employment opportunities, please email us at [business@stopthetraffik.org](mailto:business@stopthetraffik.org) to get in touch.

2 To report suspected cases of trafficking, [download The STOP APP here](#) to get started.

3 If you would like to donate to our work, [you can do so here](#).