RAPID ASSESSMENT OF IDENTIFIED RISKS OF MODERN SLAVERY FOR THOSE FLEEING THE UKRAINE CRISIS

&

Mitigation of Risk and Prevention of Slavery in the UK Context

HOPE FOR JUSTICE

"While efforts to find a resolution to the war are ongoing, concerted and evidence-based measures by the international community, as well as by state and non-state organizations, can ensure that vulnerabilities to trafficking in Ukraine are alleviated, by ensuring access to safety and essential services. For people fleeing Ukraine and seeking safety in neighbouring countries and further afield, legal entry and legal status are crucial in preventing both migrant smuggling and human trafficking."

- *UNODC, Conflicts in Ukraine Key Evidence on Risks of Trafficking in Persons and Smuggling of Migrants[i]*

About Hope for Justice

Hope for Justice is an international anti-slavery non-profit organisation working to end modern slavery with an effective and proven multi-disciplinary model with the aim to prevent exploitation, rescue victims, restore lives and reform society. Hope for Justice works in over 30 locations across five continents, and reached just under 200,000 adults and children across all its locations in 2020-2021.[ii] In the UK, Hope for Justice focuses on training statutory and non-statutory agencies, community-based prevention and identification, independent advocacy and policy reform.

At any one time, Hope for Justice provides independent socio-legal advocacy to more than 100 survivors and dependents. Hope for Justice provides an advocacy advice line to support practitioners working with survivors. Hope for Justice has also been part of developing National Training Standards and Survivor Care Standards and is working in partnership with the Snowdrop Project and the British Red Cross to develop an accreditation model for Independent Modern Slavery Advocacy (following an Independent Review of Hope for Justice's model) to set and raise standards of independent advocacy across the country.[iii]

Hope for Justice works at a local, national and international level with governments and wider agencies to improve responses and to create lasting change. In 2018, Hope for Justice utilized its frontline anti-trafficking experience to launch Slave-Free Alliance, a social enterprise that works with businesses of all sizes, including some of the world's biggest multinationals, to tackle the threat of modern slavery in their operations and supply chains. It does this via expert training, consultancy, gap analysis and other bespoke services.

Executive Summary

The risks around modern slavery and conflict are well documented.[iv] In March 2022, over 60 organisations and individuals across the US, UK and Europe signed an open letter calling on the international community to prevent trafficking and protect refugees by ensuring that all responses to this crisis include a Counter Trafficking Strategy. This should include but not be limited to:

(a) the training of all frontline agencies and citizens in spotting the signs of human trafficking to help prevent human trafficking and support victims and survivors;

(b) wider prevention measures including safe and legal routes for those fleeing the conflict;

(c) identification and restorative measures to enable the active identification of potential victims and ensure that survivors receive holistic trauma informed care;

(d) measures to enable perpetrator accountability including through criminal and civil proceedings;

(e) receiving countries support those fleeing the conflict in their financial, coordination and technical support of refugees and their protection from human trafficking, including the safe repatriation and return of citizens to their communities when safe to do so.[v]

The OSCE Special Representative and Co-ordinator for Combating Trafficking in Human Beings has also detailed a list of recommendations and identifies the need to increase anti-trafficking prevention efforts in the midst of mass migration flows.[vi]

This paper is not intended to criticise any agency but to support efforts to understand risks and how risks can be mitigated short, medium and long term. This document identifies the risks as of 1st April 2022. It is not an exhaustive list and regular changes to the situation, updates on government and wider guidance, as well as, improvements on policy and practice over time will mitigate these risks.

An anti-slavery response to protect men women and children from risks of all forms of modern slavery is an essential part of a humanitarian response, not separate to it, therefore an anti-slavery response should be embedded into a humanitarian response.

A prevention response should always be a part of a first phase response and be non-discriminatory, human rights based, person centred, and trauma informed. In addition, responses should draw from the wealth of experience of those with lived experience as well as those in the anti-slavery, humanitarian and migration sectors.

A prevention response should consist of at a minimum the following:

- **Prevention through upholding international law and policy (including but not limited to) anti-trafficking and slavery and the International Rights of Refugees.** This includes the provision of safe and legal routes for those fleeing conflict in any country.

- **Prevention through understanding risks and mitigating risks in international, national and local policy and practice.**

- **Prevention through provision of humanitarian assistance including independent services by legitimate agencies.** This should include enabling legal entry and legal status; if people are directly guided to services that meet their short, medium and long term needs (in a language they understand), that empowers effective integration. In turn, this reduces risks of being approached by those posing as providing legitimate assistance with ulterior motives.

- **Prevention through empowerment.** This should include empowering through resources and training organisations (statutory and non-statutory), communities and those vulnerable to exploitation to understand the risks, how to mitigate the risks, report issues and understand legal rights (including, but not limited to, access to independent services, language services and worker rights).

- **Prevention through a multi-disciplinary and multi-agency approach**. This draws relevant communities, agencies (including enforcement agencies) together to understand and mitigate risks as well as identifying gaps and opportunities for disrupting those who wish to exploit.

Human traffickers are entrepreneurial, innovative, collaborative, and work in partnership. Creating an ecosystem where slavery cannot survive requires entrepreneurialism, innovation, collaboration and partnership work. It should place those who are at risk and survivors at the heart of responses and ensure that they are included in the development of legislation, policy and practice at local, national and international level.

Risks and Risk Mitigation

1) *Risks in Ukraine and Border Countries*

Identified Risk	Short Term Mitigation	Medium to Long Term Mitigation
• Those in Ukraine now have limited food, water and access to humanitarian corridors and are being approached by traffickers/smugglers in-country regarding "passage" to another country (UK or another country). • Risks of impact of the crisis on law and order; the ability to respond to and investigate crime may be impacted by the diversion of law enforcement resources to address the conflict. • Risks of increased internal trafficking as well as other non-trafficking crimes. • Human trafficking and other human rights violations used as a weapon of war including sexual violence. • Risk of traffickers approaching those fleeing the crisis at every point e.g. in Ukraine; at the border; between the border and reception centres; during travel from reception centres to accommodation or support services; during dispersal travel or while in accommodation or receiving support; or online.	1. Advocacy for humanitarian corridors to allow safe evacuation. Anti-trafficking risks and responses need to be synergized into the humanitarian response in-country, in border countries and in countries people are dispersed into. 2. Information drops through multiple sources (people, places and spaces) are needed on the risks and on staying safe: leaflets, posters, social media, on forms, via aid workers, text messaging, and via border guards. Low-tech and high-tech responses are needed, and people need to know how and where to report issues. 3. There needs to be training of humanitarian workers and those at the borders and at reception centres so they can spot indicators and identify those at risk, potential victims of human trafficking, and where to report issues. 4. Identify gaps in processes which may allow traffickers to intercept those still in Ukraine and those fleeing the crisis 5. Anti-human-trafficking organisations need to be part of field protection clusters and wider clusters e.g. shelter as an anti-human-trafficking response is part of a humanitarian response. 6. Governments, humanitarian organisations and law enforcement must link up nationally and internationally, for example Interpol, Europol and national police services. This includes the dissemination of intelligence to inform targeted responses or law enforcement disruption activities. It also includes link-up with embassies in border countries, Ukraine and FCDO in-country representatives, plus liaison with NGOs working in Ukraine. 8. Development or ongoing development of operational policies by Ministry of Defence Human Security Policies, including JSP 985 including the anti-modern slavery strategy and Response. 9. Ensuring in every country that those fleeing the conflict are informed of what constitutes a war crime and where they can report this e.g. in the UK, the War Crimes Team in the Metropolitan Police: www.met.police.uk/advice/advice-and-information/war-crimes/what-is-a-war-crime/	In addition to information in short term mitigation (ongoing): 1. Extra resourcing for border countries and within the EU and a clear approach to refugees/humanitarian assistance and dispersal. 2. Resourcing and development of ongoing enforcement responses (including around disruption), data capture and investigation into human trafficking and war crimes. 3. Improve international legislation, policy and practice regarding conflict/crisis in terms of anti-trafficking responses. 4. Anti-trafficking organisations should be part of the UNHCR Protection and wider Cluster Policy responses and part of development of strategy/responses at operational level. 5. Examine role of technology such as blockchain to enable better coordination and dissemination of information safely. 6. Resourcing and development of ongoing enforcement responses, data capture and investigation into human trafficking and war crimes.

Identified Risk	Short Term Mitigation	Medium To Long Term Mitigation
• Significant challenges with the speed that matching schemes and visas are being processed for the Homes for Ukraine Scheme and wider visa schemes. This is leaving women and children at risk of facing eviction from temporary accommodation, homelessness and risks of falling prey to human traffickers.	10. The Government across the UK acts as a super sponsor for the Homes for Ukraine Scheme, allowing entry into the UK and provision of temporary accommodation and support until suitable matches are made. The Welsh and Scottish Government are already super sponsors and have set up the Homes for Ukraine schemes in this way. 11. There needs to be clear provision of safe refuge and support in Europe whilst visas are being processed and checks are being made to reduce risks of people being evicted from temporary accommodation in border countries and being placed at risk of exploitation. 12. Extra resources are needed to enable the swift processing of visa applications. 13. Information is needed in-country and in border countries in a language that people understand to direct them to official portals and matching services for the Homes for Ukraine Scheme such as the service provided by Reset.	

2) Risks on Application/Routes into the UK and Coming to the UK

Identified Risk	Short Term Mitigation	Medium To Long Term Mitigation
• Local authorities are unclear on some aspects of the Homes for Ukraine scheme and aspects of their role and responsibilities with relation to other visa schemes e.g. Ukrainians already in the UK on other visas such as Seasonal Worker scheme. This may leave gaps in safeguarding and support responses. • Currently there is only limited guidance around safeguarding and slavery risks in the government guidance.	1. Policy and guidance needs to be clearer. In particular, there is a need for more detailed guidance around roles and responsibilities, information sharing, risk, safeguarding and escalation processes. There are some extra regulations around welfare and housing/homelessness, but this needs dissemination to avoid confusion. In addition there is a lack of lack of clarity around wider visa schemes in existence, and recourse to public funds (see point 6). 2. Greater information sharing on issues and risks (between Home Office and local authorities) including around modern slavery and wider vulnerable adult and child protection risks as part of the Guidance for Local Authorities on the Homes for Ukraine Scheme and sponsors and potential risks for vulnerable sponsors. 3. Clear and extra information and guidance regarding safeguarding risks on trafficking and unaccompanied children – responsibility is with the local authority – linked to wider statutory guidance (e.g. Statutory Guidance on Modern Slavery). Note: Homes for Ukrainian Scheme is **not** a private foster arrangement. 4. Linked up approach at local and national level between Home Office, FCDO, Department for Levelling Up, Housing and Communities and Department for Work & Pensions. 5. Ongoing updated guidance to deal with challenges, threats and emerging risks and practical application. 6. Clarity regarding the wider schemes and Ukrainians in-country e.g. on the Seasonal Worker visas including (a) around recourse to public funds (b) whether their visas will be extended to the time period of those fleeing the conflict (c) bringing family members (d) the role of local authority provision. 7. Need for link-up with the anti-trafficking responses and partnerships with migration partnerships and migration hubs to build capacity (e.g. training/anti-slavery resources). 8. Transfer lessons from existing hosting schemes and other refugee schemes such as the Syrian Vulnerable Person Resettlement Programme (VPRS).	See points in short term risks (ongoing). 1. Need for ongoing updated guidance to deal with challenges, threats and emerging risks and practical application. 2. Increased funding for assistance and support to integrate into communities which can act as protective factors. 3. Need for ongoing updated guidance to deal with challenges, threats and emerging risks and practical application.

Identified Risk	Short Term Mitigation	Medium To Long Term Mitigation
• Organised crime groups quickly identify vulnerabilities and gaps in systems and responses e.g. people coming into country –transport to areas- reception centres-accommodation- outreach/migration centres. • Note: As many resources pivot to the Ukrainian crisis, reduced resources in other areas may increase vulnerabilities of wider vulnerability groups e.g. refugees more widely.	1. Linked up approach between intelligence and national and local responses, humanitarian responses, and anti-slavery responses For example, links between Europol, individual police services and the National Crime Agency, including links with local authorities and local responses, and those supporting Ukrainians fleeing the conflict. A linked-up approach will better support those who have been impacted to identify risks. It will also benefit disruption activities, such as by utilizing resources in local partnerships e.g. Migration Partnerships / Community Safety Partnerships / Anti-Slavery Partnerships. 2. Anti-Slavery Partnerships linked up at local and national level with Migration Partnerships, community groups, and Community Safety Partnerships to maximize collaboration, resource sharing and knowledge. 3. Utilisation and dissemination of soft intelligence routes locally including use of wider apps such as the STOP APP. 4. Repository of useful practical information around slavery and wider support responses to avoid duplication (Hope for Justice, Human Trafficking Foundation and the British Red Cross are working on this with other organisations). 5. Information provided to those fleeing the Ukrainian conflict coming into the UK at border areas/reception centres etc. via applications/text message/leaflets around: (a) where to access humanitarian assistance/rights and entitlements e.g how to register children at school/welfare benefits, rights as a worker; (b) travelling safe and staying safe; (c) specific indicators/risks around labour exploitation and slavery and where to report concerns. Note: All materials should be gender-sensitive. Access to language services for both adults and children (e.g. via community-based English Language training) is essential for accessing services, legal advice, the labour market and ultimately reduces risks of exploitation. 6. Utilise this opportunity to disseminate training and anti-slavery materials to communities, individuals and organisations working more broadly with vulnerable groups.	Points 1. to 4. of Short Term Mitigation are also relevant for Medium to Long Term Mitigation

Identified Risk	Short Term Mitigation	Medium To Long Term Mitigation
• Online approaches around coming to the UK and Ukrainians having to contact potential sponsors for the Homes for Ukraine Scheme and vice-versa regarding matches e.g. approved sponsors "advertising" for a female in their 20s and asking for a photo. • Traffickers setting up matching schemes (there is anecdotal evidence from Ukrainian organizations regarding websites of concern that are already being set up). • Unaccompanied children or private foster arrangements where there may be no clear adult consent or the identified adult may not actually be the parent or guardian of the child.	1. Information on rights in the UK/scheme and risks around exploitation and traffickers disseminated through social media and wider channels (as above). 2. Ongoing assessment of online activities by enforcement bodies, technology companies and NGOs to identify scams/disseminate and work with multi-agency partnerships to modify materials to address specific scams/risks (collaboration between enforcement agencies including Action Fraud/Serious Fraud Office). 2. Direct people to official portal for matching for the scheme and official matching schemes e.g. Reset. Dissemination of best practice on official matching schemes. 3. Helpline number (which could be extended to highly visible reporting mechanisms to report concerns online, with appropriate escalation procedures where a person reports a concern to a community or organisation) including anonymous whistle blowing. 4. Ensure information on specific vulnerabilities is included in the visa application. Any specific issues, including around children, should be disseminated to local authorities quickly to enable them to assess risks regarding sponsors and those being sponsored, and to enable early identification of unaccompanied or separated children. 5. Clear guidance and escalation procedures on what should be done in the event of inappropriate approaches made by registered sponsors.	See points in short term mitigation of risks ongoing medium term.
• Approaches by traffickers to recruit and offers of employment and housing (at reception centres, outreach services, drop-in services, online). • Traffickers masking as providing humanitarian assistance e.g. fake charities etc.	1. Awareness training (staff and volunteers) on activities and where to report issues. 2. Ongoing information and advice for those receiving services on rights, risks, good work etc. (see points above) and training/information for those who are providing services on anti-slavery risks. 3. More monitoring of patterns in job offers targeted towards those fleeing Ukraine.	
• People on visas arriving without accommodation – so presenting as homelessness	1. Information and supported referral to appropriate agencies e.g. homelessness services within the local authority and homeless charities. 2. Clarity in law and guidance on local authority responsibilities towards those fleeing the conflict on all visas including Ukrainian nationals in the UK at the time of the conflict.	

Identified Risk	Short Term Mitigation	Medium To Long Term Mitigation
• Homes for Ukraine Scheme may be open to abuse and exploitation risks. Some of these risks could also arise with vulnerable sponsors. This includes: -Traffickers using families that they are already exploiting as sponsors. -Financial abuse and fraud e.g. not providing accommodation, leaving the person homeless and at risk, but taking the funds for sponsorship (welfare benefit fraud). Financial abuse of sponsor regarding gaps in support provisions. -Domestic abuse, wider child abuse or sexual abuse by paedophiles or traffickers and other forms of exploitation where children or vulnerable groups are targeted e.g. county lines. -Gaps while things are put in place e.g. financial gaps between welfare processing or getting a job. -Domestic servitude (working all hours in the home for the host family). -Forced labour risks, where money goes to the host. -Sex trafficking or wider sexual exploitation (adults and children). -Lack of safeguards / responsibilities for unaccompanied children (or accompanied and separated). Lack of checks into the claimed parent or guardian. -No support for sponsors and financial gaps –people only provided with £200 initially, which is insufficient. -No clear contingencies re: breakdown of the sponsorship scheme or re-matching. No escalation route for flagging issues on screening or further issues or complaints (including safeguarding issues). -Overcrowded and unsuitable accommodation and need for checks, and unsuitable hosts e.g. adverts for people to sponsor (those already approved) asking for a female in their 20s with a photo. -Legacy of restrictive visas and people may consider they have to stay with the host family for 6 months and cannot transfer everywhere else.	1. Appropriate DBS checks and suitability checks, especially for children. Regular home checks, including pre-arrival checks, on suitability of the sponsor and accommodation. 2. Info on how and where to report issues and complaints about sponsors and on transfers to another household. This should include complaints and escalation procedures. 3. Info and advice for sponsors on risks around approaches and rights and supporting refugees. 4. Welfare checks (short and long term). 5. Info on rights and entitlements, including on relevant schemes. This should include scheme boundaries, appropriate & inappropriate behaviour, and where to report issues. 6. Support and immigration advice in country of origin/border countries for applications including identification of vulnerable adults and children in these processes. 7. Support for families and sponsors on the financial gaps and resettlement – need for sponsor (including peer support). Extra training and support would include: a) peer groups for hosts and those being sponsored. b) training for hosts, including role of host and coordinating support, preparing home, culture etc., building healthy and appropriate relationships, understanding trauma, boundaries, power dynamics, information for children in household on guides to hosting, policy and procedures re: complaints and escalation on issues resolving issues. Note: NACCOM have produced tools: https://naccom.org.uk/resources/ 8. Specific helpline or email help address created to report issues and complaints including potential for anonymous whistleblowing in the interim. Dissemination and support should be provided by existing humanitarian and other helplines – with an escalation procedure to local authority and Home Office. Need to involve Fraud Action line regarding matching scams. 9. Effective planning on transferring out of the scheme (6 month commitment) to suitable private or local authority housing (significant shortage of social housing, particularly in London), to prevent risks of homelessness, itself a risk factor for modern slavery. 10. Need for routes for independent advice and key workers to enable access to welfare assistance, applying for school placements, language classes, employment and wider support to enable integration into a community. This is highly complex requiring professional advice and should not be the responsibility of sponsors. 11. Need to take on board information and learnings from wider hosting schemes/matching schemes including training and transfer this learning. 12. Identify extra funding needs. Funding must be provided for extra housing needs outside the scheme. Clarity is needed on wider household needs such as utilities/internet	1. See points in short-term mitigation plus development of governance and oversight of schemes by those with experience in supporting refugees and running hosting schemes. 2. Sharing of learnings to improve the scheme including around matching schemes. 3. Clear structure and processes for integration and transition from the scheme into housing in the community.

Identified Risk	Short Term Mitigation	Medium To Long Term Mitigation
• People on wider visas (e.g. Seasonal Worker visas) without accommodation and outside the Homes for Ukraine scheme presenting as homeless. There are risks of recruitment by traffickers around work and basic accommodation as people cannot return home, but will be forced potentially into illegal work at the end of the visa. • Ukrainian nationals do not apply for biometrics or extension of stay in time and may then be considered illegal; or shorter-term visas lapse e.g. those on existing schemes such as Seasonal Worker scheme. • Ukrainian nationals 'cliff drop' from existing visas to undocumented work e.g. Seasonal Worker visas for those in-country – what happens after three years?	1. Current Seasonal Worker visas or other visas for those already living in the UK when the conflict started should be extended to at least the equivalent for the Homes for Ukraine Scheme, three years (if the current visa is less than this time period). This should include clear recourse to public funds with the option of bringing over family members and ability to change employment. 2. Legally aided immigration advice should be extended to cover applications for leave to enter or remain under these schemes, including applications for extending visas. All Ukrainian nationals and those on the scheme and previously in-country require immigration advice, especially if considering changing their visa. 3. Dissemination of information on scams and risks and legal rights as a worker to Ukrainian nationals and those supporting them, including access to resources on rights and entitlement in different languages e.g. Gangmasters and Labour Abuse Authority (GLAA) worker rights brochures and Good Work app and where to report issues. 4. Clarification of the issue of refugee status for those fleeing the conflict.	Points 2. and 3. from the Short Term Mitigation column are relevant in the medium to long term. There is a long-term need to be able to extend the visa with an option of applying for indefinite leave to remain. Long-term regularisation is key to reducing risks of worker exploitation/re-exploitation/homelessness and destitution.

If you have any queries, contact Phillipa Roberts, Head of Policy and Research (Solicitor) at Hope for Justice:
phillipa.roberts@hopeforjustice.org or telephone 0300 008 8000

[i] https://www.unodc.org/documents/human-trafficking/2018/17-08776_ebook-Countering_Trafficking_in_Persons_in_Conflict_Situations.pdf; https://www.unodc.org/documents/data-and-analysis/tip/Conflict_Ukraine_TIP_2022.pdf
[ii] https://hopeforjustice.org/annual-review/
[iii] https://hopeforjustice.org/news/new-partnership-launched-to-assist-survivors-of-modern-slavery-to-get-the-support-they-need/
[iv] https://www.unodc.org/documents/human-trafficking/2018/17-08776_ebook-Countering_Trafficking_in_Persons_in_Conflict_Situations.pdf; https://www.unodc.org/documents/data-and-analysis/tip/Conflict_Ukraine_TIP_2022.pdf
[v] https://hopeforjustice.org/news/anti-trafficking-organizations-unite-to-condemn-ukraine-invasion-and-traffickers-attempts-to-target-fleeing-victims/
[vi] https://www.osce.org/cthb/513784 and https://www.osce.org/cthb/516423