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War, Displacement, and Human Trafficking and Exploitation: Findings from an evidence-gathering Roundtable in Response to the War in Ukraine

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ABSTRACT

Millions of people have been displaced following Russia's invasion of Ukraine in February 2022. Despite increasing concerns about the associated risks of human trafficking and exploitation, evidence remains sparse. To address this gap, and explore relevant experiences and perspectives, we co-convened an international online roundtable together with the UK's Independent Anti-Slavery Commissioner. The roundtable addressed emergent issues, key concerns and recommendations, with a particular focus on the UK's response to people fleeing Ukraine. Over one hundred people from various professional backgrounds including healthcare, lawyers, charities, law enforcement, policy makers and academics participated. Qualitative thematic analysis identified five major themes: 1) conflict can create and compound opportunities for trafficking and exploitation; 2) the UK's visa-based response to Ukrainian refugees lacks clarity, resourcing and accountability; 3) information gaps and overloads, both for people seeking sanctuary and those supporting them, can exacerbate risks of trafficking and exploitation; 4) insecurity, fear and the broader political climate around immigration and asylum create challenging conditions to respond; and 5) longer-term strategic planning around displaced Ukrainians is vital but appears lacking. Here, we discuss the key findings from the roundtable, situating them within the broader literature and reflecting critically on their implications for evidence-gathering, research, policy and practice.



KEYWORDS

Conflict; crisis; refugees; forced labor; sexual exploitation; domestic servitude; human trafficking; modern slavery; methods

Introduction

On 24 February 2022 Russia launched a full-scale invasion of Ukraine, marking a significant escalation in a conflict underway since its illegal annexation of Crimea in 2014 and the subsequent war in Ukraine's Donbas region.¹ The war in Ukraine sparked the fastest-growing refugee situation in the world, and has been widely described as one of the greatest threats to European security since World War Two (e.g., Reilly & Flynn, 2022). Of Ukraine's population of 44 million, more than 12 million people are now estimated to be displaced: over seven million internally and over five million internationally (UNHCR, 2022b).²

Existing research shows that conflict can create and compound opportunities for crime, including human trafficking and exploitation (IOM, 2015; Muraszkievicz et al., 2020a; UNODC, 2018). There are understandable concerns, therefore, that the war in Ukraine will lead to increases in trafficking and

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¹By 2021, the Ukrainian Government had reportedly registered over 1.4 million people as internally displaced persons as a result of the conflict in Donbas and occupation of Crimea in 2014 (UNHCR, 2021).

²It should be noted that although people have also been returning to Ukraine on a large scale, it has been stated that "[m]ovements back to Ukraine may be pendular, and do not necessarily indicate sustainable returns as the situation across Ukraine remains highly volatile and unpredictable" (UNHCR, 2022c).

exploitation, particularly among displaced women and children. Yet, there is only limited academic literature addressing the risks of trafficking and exploitation in this context. Moreover, that which is available (reviewed below) often focuses only on sexual violence, to the neglect of other trafficking-related issues (e.g., domestic servitude). With this paper, we seek to address this evidence gap. We analyze the discussions at an international roundtable designed to gather evidence and insights from a range of perspectives about the effects of the war in Ukraine on risks of trafficking and exploitation, and the implications for both immediate and longer-term responses to this conflict.

The remainder of the article is organized as follows. In the next section, we critically review the literature on trafficking and exploitation linked both to the war in Ukraine and to conflict more generally. We then describe the data and methods used in this study. The results then follow, organized into five key themes identified from the roundtable. The article ends with a discussion of the findings' implications for policy, practice, and future research.

Context: Conflict, Displacement and Trafficking

Given the recency of the war in Ukraine, research into the associated risks of human trafficking and exploitation is understandably limited. Exceptions include a commentary in the medical journal *The Lancet* that focused on the prevention of conflict-related sexual violence in Ukraine (Stark et al., 2022), mentioning trafficking only in passing. Based primarily on the literature on other conflict settings, the authors emphasize that “[t]his mounting crisis suggests, not for the first time, that conflict-related sexual violence requires urgent action” (Stark et al., 2022, p. 2173). Also in *The Lancet*, Kumar et al. (2022) drew on interviews with key informants to inform recommendations for better meeting the health needs of those displaced by this war. They describe “ineffective coordination, lack of health system preparedness and inadequate cross-border collaboration” and challenges in “implementing and operationalizing” available health guidance, including a lack of sufficient funds and human resources (Kumar et al., 2022, p. 3). In both articles, trafficking in relation to the Ukraine conflict is mentioned as a public health concern, but it is not a core focus and the scope appears implicitly reduced to trafficking for sexual exploitation alone.

The gray literature provides a more extensive focus on human trafficking (of all types, not just sexual exploitation) associated with the war in Ukraine. For example, the United Nations Office on Drugs and Crime (UNODC, 2022) produced a brief, top-level overview of the risks of trafficking and smuggling related to this war, setting out the scale and basic demographics of the refugee population (estimated as 50% adult women, 40% minors, 10% adult men³) and highlighting key countries in which Ukrainians have previously been identified as victims of trafficking (most notably Russia and, to a lesser extent, Poland). The report recognizes the diversity of risk, stating that those fleeing Ukraine have “different vulnerabilities and protection needs,” raises particular concerns around unaccompanied minors, and stresses that non-Ukrainians may need to resort to smuggling services, thus increasing their risk of exploitation (UNODC, 2022, p. 2). Likewise, a UNICEF (2022) press release warns that “massive displacement and refugee flows ... could lead to a significant spike in human trafficking and an acute child protection crisis,” describing displaced children as “extremely vulnerable to being separated from their families, exploited and trafficked.” Additionally, the Organization for Security and Co-Operation in Europe (OSCE, 2022) has issued guidance calling on countries to implement a wide range of recommendations to address risks of trafficking resulting from the war in Ukraine.

In addition to these top-down publications, two non-governmental organizations (NGOs) have released findings from rapid research projects on trafficking risks in relation to the war in Ukraine. First, Human Rights Watch (2022a) interviewed 20 women and girls fleeing the war and 26 other key

³The comparatively low proportion of adult men is to be expected given that many men are fighting in the war and Ukrainian martial law bans men aged 18 to 60 years from leaving the country (with some exceptions, e.g., in the case of disability or certain caring responsibilities).

informants across a variety of sites in Poland in March 2022. The results were published as a news story on the NGO's website in late April 2022, with scant information about the research methods. Such limitations notwithstanding, the story provides a valuable snapshot of urgent issues in a prominent receiving country. The professionals interviewed are described as raising concerns over "the lack of systematic security measures or means to identify, prevent or respond to gender-based violence, including trafficking, sexual exploitation and rape" (Human Rights Watch, 2022). Of the small sample of refugees interviewed ($n = 20$), four reported having encountered "suspicious offers of housing, jobs or transportation" and one disclosed a concrete incident of attempted exploitation (being pressured into sex work and having her wages as a dancer docked upon refusal). Second, in May 2022 La Strada International released a rapid assessment around risks of trafficking of refugees from Ukraine, designed to scope risks and gaps in current anti-trafficking responses (Hoff & de Volder, 2022). The assessment drew on a combination of desktop research, online interviews/e-mail consultations with key informants (overall n unclear, conducted March–April 2022), a field visit to Poland and a small-scale survey ($n = 16$ participants). Unsurprisingly given the timing of the research, the numbers of concrete cases of concern reported are very small and oftentimes relate to unconfirmed cases: seven trafficking-related requests for support received by members of La Strada's international network of NGOs, a "handful of potential cases" reported to the International Organization for Migration (IOM) and some suspicions of behavior that could indicate trafficking among pan-European and national law enforcement agencies (Hoff & de Volder, 2022, p. 34). The authors also report that existing trafficking hotlines in European countries "are receiving up to five times as many calls" as normal (Hoff & de Volder, 2022, p. 6), although calls are reportedly linked to a variety of concerns, and neither specific statistics nor pre-invasion baselines are provided. The authors highlight a range of different factors as increasing vulnerability to trafficking and exploitation – some described as particular to Ukraine (e.g., high rates of domestic violence, large Roma and stateless populations) and others as more generic to crisis at large (e.g., breakdown of rule of law, rupture of social ties). They also highlight numerous shortcomings in current anti-trafficking responses, particularly around insufficient resourcing, coordination, information, vetting and access to vital services (e.g., psychosocial and trauma support, and abortion).⁴ Overall, the authors conclude that, "[w]hile it is far too early to quantify the scale of the problem, the risks are clear – and it is likely that these risks will increase" (Hoff & de Volder, 2022, p. 2). While the report is generally nuanced and wide-reaching, it has a clear (and understandable) focus on Ukraine and key receiving countries nearby (Poland, Moldova, Hungary, Romania and Slovakia). The authors emphasize, however, that challenges are likely to arise in other transit and destination countries as displaced people move on. Thus, there is a clear need for complementary research focused elsewhere.

Looking beyond Ukraine-specific research, there is some evidence that conflict can create and compound opportunities for trafficking and exploitation (IOM, 2015; Muraszkwicz et al., 2020a; UNODC, 2018). Key contributing factors, typically framed in broad terms, include "[s]tate collapse, deteriorating rule of law and impunity," "[f]orced displacement," "[h]umanitarian need and socio-economic stress" and "[s]ocial fragmentation and family breakdown" (UNODC, 2018, p. 5). Trafficking, however, has not typically been a priority for humanitarian or military responses (IOM, 2015; Muraszkwicz et al., 2020a). Despite growing interest in and prioritization of the issue (IOM, 2015; UNODC, 2018), the so-called 'nexus' between conflict and trafficking remains under-theorized and subject to little rigorous empirical research (Kidd, 2020; Muraszkwicz et al., 2020b). The IOM (2015, p. 9) acknowledges, for example, that "[w]hile there is plentiful anecdotal evidence, reliable data and consolidated research and analysis are scarce." Kidd (2020) argues there are clear imbalances in the literature on trafficking in conflict, stating that the limited research to date has focused primarily on either 'child soldiers'⁵ or 'peacekeepers' involvement in trafficking. Likewise, a systematic review of

⁴The question of abortion is particularly pertinent given increasing accounts of rape as a weapon of war and the large numbers of people arriving in Poland, where abortion is illegal even in the case of rape.

⁵For further discussion of the term 'child soldiers' and why it is contentious and increasingly rejected, see, Kidd (2020)

the literature on sex trafficking and sexual exploitation in conflict settings in Africa, Asia and the Middle East found a dearth of high-quality studies and particular knowledge gaps around questions of prevalence (McAlpine et al., 2016). Relatively little research attention has also been paid to trafficking and exploitation of people fleeing conflicts, whereby notable exceptions include a multi-method study into the impact of the Syrian war and associated refugee situation on trafficking, from the International Center for Migration Policy Development (ICMPD, 2015). Challenging the dominant tendency to approach anti-trafficking through the lens of transnational organized crime, that research emphasizes the predominance of more casual, localized, smaller-scale activity embedded within preexisting relationships (family members, acquaintances, neighbors, etc).⁶ The importance of paying attention to localized context, structural factors, and complex, nuanced questions of agency and constraint are stressed; not only those exploited but the people exploiting them are described as often operating in situations with “no viable alternatives for survival” other than engaging in behaviors that can be characterized as trafficking under international law (ICMPD, 2015, p. 7). In a related vein, Kidd (2020) theorizes that the primary mechanism by which conflict renders people more vulnerable to being trafficked is by reducing their agency, constraining their alternatives and thus compelling them into making decisions they may well acknowledge as risky but which nevertheless represent the ‘least worst’ option available. Importantly, opportunities for conflict-related trafficking and exploitation can be intertwined with states’ responses to refugees, including border-control policies further afield and an associated lack of safe and legal onward routes (Healy, 2016; ICMPD, 2015).

Overall, there are clear grounds to be concerned about trafficking and exploitation related to the war in Ukraine. We were acutely aware, however, of the need to take a measured approach to a patchy and still emergent evidence base, neither minimizing nor overstating the issues involved. In an effort to contribute in a timely and useful way, we organized an exploratory, consultative roundtable to draw on a range of expertise and experiences, make key issues visible and support more informed and nuanced responses. Our guiding aim was to gather and synthesize evidence from a wide range of stakeholders about four interlinked areas: 1) emergent issues already being encountered around trafficking and exploitation in relation to the war in Ukraine; 2) key risks and concerns; 3) recommendations for responses; and 4) words of caution. The final point is of particular importance: despite enormous investment in anti-trafficking activity, the field has an inglorious history of interventions that are of unclear and/or questionable efficacy and of those that have actively harmed the people they claim to serve and neighboring populations, most notably sex workers and child laborers (Cockbain, 2020). Moreover, when increasingly restrictive immigration controls are enacted in the name of anti-trafficking, wide swathes of migrants are affected (Sharma, 2003, 2005).

We deliberately framed the roundtable around ‘human trafficking and exploitation’ rather than ‘modern slavery,’ although the latter is increasingly becoming the dominant term in the UK (Broad & Turnbull, 2019). We did so partly due to the greater racialized and sensationalizing connotations of ‘modern slavery’ (O’Connell Davidson, 2015), but mainly in order to encourage a more inclusive approach to the roundtable. We wanted to encompass not only the extreme ends of what is increasingly understood as a dynamic “continuum of exploitation” (Skrivankova, 2010) but also lower-level, more routinized interpersonal abuses that might not cross the legal threshold to be considered trafficking but are nevertheless harmful and comparatively neglected in research and policy (see, e.g., Cockbain et al., 2019; Davies, 2018).

Crucially, the issues related to trafficking and exploitation discussed in this paper constitute just one part of a much broader picture of harm associated with the ongoing war in Ukraine, which includes thousands of civilian deaths and injuries (OHCHR, 2022), mass displacement, widespread destruction of physical and social infrastructure and growing reports of atrocities involving systematic rape, torture, abduction, starvation and murder (e.g., Human Rights Trew, 2022; Watch, 2022b). Major

⁶This tension between stereotypes of criminal masterminds and empirical realities is also evident in recent non-conflict-related research into ‘modern slavery’ offenders (Broad & Gadd, 2019; Cockbain, 2018)

investigations are now underway in Ukraine and internationally into war crimes and crimes against humanity, including from the International Criminal Court (European Commission, 2022).

Data and Methods

Undertaking research into conflict situations is highly challenging (Ford et al., 2009; IOM, 2015), but necessary to support those affected and to inform humanitarian efforts, advocacy, and other responses. Reliable data on the extent, nature and correlates of human trafficking associated with the ongoing conflict in Ukraine simply do not exist as yet – and may never do. Consequently, we focused our efforts on bringing together relevant specialists from a variety of sectors to scope out where they perceived the risks of trafficking and exploitation to lie, what they saw as key challenges, and ways of mitigating and responding to these identified issues. To do so, we convened an online roundtable in collaboration with the UK's Independent Anti-Slavery Commissioner Dame Sara Thornton, who has since left the post and is controversially yet to be replaced (Dugan, 2022a). The involvement of the Commissioner and her team was especially valuable in reaching key stakeholders in government agencies and enhancing the profile and credibility of the roundtable and its later report (Cockbain & Sidebottom, 2022).

We recruited roundtable participants in two ways. First, we used purposive sampling to secure key speakers for the event and ensure participation from a diverse range of individuals and organizations, prioritizing those with a professional focus on the war in Ukraine but also seeking broader transferable expertise around trafficking, migration, labor rights and child protection. Second, some snowball sampling occurred, since invited participants suggested other relevant people or organizations. In total, there were 103 participants from 65 organizations, including lawyers, NGOs, healthcare, national and transnational governmental organizations, law enforcement, labor market enforcement, academia, and private sector companies.

The roundtable took place online on 7 April 2022 and lasted two hours. It included nine short talks from invited speakers (three of them Ukrainian) and discussions both in breakout rooms and plenary format. We asked all participants to focus their contributions on four main areas related to trafficking and exploitation associated with the war in Ukraine: (1) emergent issues already observed; (2) particular risks and concerns; (3) recommendations for responses; and (4) words of caution for responses. Except for invited talks, all discussions were conducted under the *Chatham House Rule*, to encourage open and candid discussions on sensitive topics. For a full list of named speakers and participating organizations, please see [Appendix 1](#). While there was clearly some discrepancy in 'voice,' in that only invited speakers had dedicated five-minute slots to speak, we sought to ensure that all participants had the chance to contribute (hence the use of small breakout rooms). In addition, we encouraged participants and others who were invited but unable to attend to submit any additional points by e-mail within a week of the roundtable ending, and also considered these contributions in our analysis.

The roundtable was digitally recorded and transcribed verbatim. We then used an iterative thematic approach to analyze the data in order to identify major themes and present actionable and timely policy recommendations. Our approach to analysis was in effect a reflexive thematic analysis (Braun & Clarke, 2006; Braun et al., 2018), albeit a rapid one. Located within a realist theoretical framework (Aronson, 1995), we focused on the semantic level (i.e. what was said) and took an inductive (bottom-up) approach, rather than relying on predetermined categories. Key stages in the analysis process involved (1) both authors independently reading the transcript (and e-mails) to familiarize ourselves with the data; (2) identifying what we individually saw as the key themes from the roundtable discussions; (3) discussing ideas for themes, amending as needed (n. b. we found a high level of agreement), grouping and agreeing themes; (4) both re-reading the transcript (and e-mails) and coding the data based on the agreed themes, refining them iteratively as needed; (5) selecting examples and quotations to illustrate the final themes; and (6) developing concrete policy recommendations based on the thematic findings (see, Cockbain & Sidebottom, 2022). Including quotes within our results helps add nuance and provide "thick description"

(Geertz, 2008). As agreed with participants, only quotes from invited speakers are attributed to named individuals: the rest we anonymized. We believe the analysis offers a fair and nuanced reflection of the roundtable discussions, but do not claim to speak for the views of *all* participants, let alone the organizations they represent. Notably, participants varied not only in *what* they said, but how much and how candidly. In our analysis, we sought to capture both points of convergence in the views expressed, and notable divergences (i.e., deviant case analysis).

Ethics

The broader research program under which this roundtable was organized was reviewed and approved by the UCL Research Ethics Committee (approval reference: 5160/002). Since this specific event was not included in the original project plans, we sought additional advice from the Departmental Ethics Committee. They deemed the event exempt, on the basis that no sensitive data was being collected, no personal information was obtained, and participants were taking part in the event as part of their broader public roles in this space.

Participants gave informed consent, on the understanding that the discussions would be used for a written report and associated publications. Ahead of the event, all participants were informed of the aims of the roundtable, plans to record it, and to publish from it. On joining, participants also saw an automated warning in Zoom that the event was being recorded and by remaining they were giving consent to the recording. We communicated to participants clearly that the event was being run under the *Chatham House* Rule (with the exception of the invited speakers' talks), meaning what they said might be used as quotations but would not be attributed, thus protecting anonymity and confidentiality. We discussed attribution with invited speakers ahead of time and agreed that quotes from their short talks would be attributed, and anything they said beyond the prepared talks (e.g., in breakout rooms) would be anonymized, as per the other participants.

Results

In this section, we present the five main themes identified through our qualitative analysis of the roundtable transcript. Importantly, these themes are not discrete but rather have overlaps and interconnections. Throughout, we discuss specific results in the context of the broader relevant literatures, before turning to an overarching discussion in the final section.

The Bigger Picture: Understanding How Conflict Can Drive Trafficking and Exploitation

The war in Ukraine was seen by roundtable participants to present many real and significant risks of trafficking and exploitation, both for people remaining in Ukraine and those forced to leave. Many warned of a potential "*human trafficking crisis*," invoking a clear sense of urgency.

Unpicking How This War Translates into Risks of Trafficking and Exploitation

Participants identified three main ways in which the war in Ukraine may increase risks of trafficking and exploitation. First, the scale, speed and demographics of those fleeing. Around 90% of the (then) estimated ten million refugees were women and with a long seen as particularly vulnerable to trafficking, particularly for sexual exploitation (e.g., UNODC, 2016). That said, a tendency to neglect or minimize trafficking risks to men has increasingly been criticized (Cockbain et al., 2018; Surtees, 2008). Indeed, although the roundtable discussions typically centered on risks beyond Ukraine's borders,⁷ one participant flagged "*exploitation in the armed conflict itself*" as a major concern for

⁷More unusually, one participant also called for attention to how the war might impact upon established trafficking routes through Ukraine, citing specifically routes from Vietnam and China.

men and boys remaining (Dr Claire Healy, UNODC). For context, male Ukrainian citizens aged 18 to 60 years have been (controversially) banned from leaving the country under martial law since 24 February 2022, with limited exemptions (see, e.g., Tondo, 2022a).

Other and oftentimes intersecting factors highlighted at the roundtable as further increasing vulnerability to trafficking and exploitation included being an unaccompanied or separated minor, being elderly, belonging to a minority ethnicity group (e.g., Ukraine has a large Roma population), having a disability, being LGBTQ+, and lacking access to safe routes and settlement (something particularly affecting non-Ukrainians fleeing the war) (see also, Hoff & de Volder, 2022). The following quote illustrates how participants' concerns often centered around broader risks of exploitation, including sexual violence, as opposed to being limited to trafficking alone:

We already know that Ukrainian women and girls . . . are approached at the railway stations, at the reception facilities, by males offering them money in exchange for sex or just offering them an overnight stay which ultimately might result in raping. – Tetiana Rudenko, OSCE Office of the Special Representative and Coordinator for Combating Trafficking in Human Beings

Second, participants stressed that mass displacement is taking place against a backdrop of a breakdown of law and order, major disruption to critical systems, infrastructure and support networks, a lack of basic resources, and, critically, a general uncertainty among those fleeing Ukraine about what to do, where to go, and whom to trust. Participants emphasized that such situations both create and amplify opportunities for exploitation. A recurrent point made by participants was that people in danger and struggling to meet basic needs are compelled into heavily constrained decision-making; a view that reflects a nuanced, sympathetic understanding of agency, choice, and constraint, often said to be lacking in mainstream trafficking discourse (see, e.g., Boyden & Howard, 2013). Indeed, the perspectives raised in the roundtable recall instead Kidd's (2020) work theorizing that conflicts drive trafficking by reducing and constraining agency. As one roundtable participant said:

Conflict, it leads itself to a lack for legitimate choice, so often it's a choice of lesser evils, and into that whole mix as well is a breakdown in support networks that increase vulnerability, and then the kicker is there's no way to accurately identify who is and isn't legitimate when you're having to make those choices.– NGO

Third, *new* risks specific to the war in Ukraine were seen to be interacting with *existing* systemic risks in the UK, together making “almost a perfect storm of conditions” (Academic) that meant at least some degree of trafficking and exploitation was seen as inevitable.

Much of [what] we're seeing with Ukrainian nationals being exploited is an exacerbation of risks that already existed in many sectors and the need for increased labor market enforcement, resourcing, increased powers to address exploitation. – NGO

Such concerns were common and there were also various discussions of emerging (thus far largely, and unsurprisingly, anecdotal) accounts of disappearances, sexual violence and suspected trafficking and exploitation. For example, one participant reported hearing an account from the Ukrainian border of suspected organized criminals trying to pass themselves off as aid workers to recruit and exploit fleeing refugees, and another described known cases of exploitation of Ukrainians already in the UK with irregular migration status.⁸ Overall, however, participants agreed that there is currently little reliable data on the nature and extent of trafficking and exploitation linked to the war in Ukraine. While largely seen as inevitable given the recency of Russia's invasion of Ukraine, this lack of data was also cited by participants as a warning of how many unknowns there are at present. To this end, participants called for greater monitoring and collection of evidence of trafficking and exploitation

⁸Readers should note that in the five months following the roundtable, there have been further developments in this space. For example, in September 2022, we learnt from a key anti-trafficking NGO that they had since been involved in the referral of several Ukrainians into the UK's National Referral Mechanism (NRM) as suspected victims of trafficking/modern slavery'. Moreover, in Ukraine several individuals have since been arrested in relation to an alleged sex trafficking network operating between Ukraine and Turkey (Tondo, 2022b).

linked to the war in Ukraine. Yet, even without the additional complicating factors of an ongoing war, there are well-documented barriers to establishing a reliable picture of the scale and nature of these complex and contested issues (see, e.g., Cockbain et al., 2020; O'Connell Davidson, 2015). Some participants raised specific concerns about substantial increases in online searches related to Ukrainian escorts and Ukrainian pornography. Although not presented at the roundtable as evidence of trafficking *per se*, claims-making in this space (see also, OSCE, 2022) should be treated with great caution: it is notoriously difficult to disentangle trafficking from consensual sex work using online data and the two are often wrongly conflated (Kjellgren, 2022).

The Importance of Taking a Nuanced, Proportionate View of Risk and Resilience

Participants argued that the discourse around the risks (and responses) to refugees from Ukraine needed to be nuanced and inclusive. More specifically, and in line with Hoff and de Volder (2022), they emphasized that risks of sexual violence must be considered alongside other forms of risk such as exploitation in domestic servitude and elsewhere in the labor market.

It was very welcome that labor exploitation is being looked at by the [roundtable] speakers and by others now because sex[ual] exploitation, which is a huge and important issue, was being emphasized at the expense of all the other forms of exploitation. – NGO

This point also resonates with a key lesson from the trafficking research literature at large: the traditionally intense focus on sexual exploitation has helped obscure and overlook many other trafficking-related issues, although the situation has somewhat improved more recently (see, e.g., Cockbain et al., 2018).

Going further, some participants expressed concerns that anti-trafficking interventions related to Ukraine may be deployed in a way that further disadvantages already marginalized groups. Similar concerns were flagged by members of sex worker-led organizations in discussions ahead of the roundtable.

My concern here is that this potential exploitation in the sex industry can be used once more to legitimize anti-sex work and anti-migration initiatives and that it might end up in deportation rather than assistance . . . And I think this goes, you know, far beyond the specificity of the sex industry because if we want to build trust and if we want to make sure that we reduce this vulnerability then the priorities and needs of people need to come first . . . let's make sure that whatever help is there is not counterproductive for migrants. – Academic

In a similar vein, while children (especially unaccompanied or separated minors) were widely seen as being at greater risk of trafficking and exploitation, participants stressed repeatedly the need for careful, proportionate, individualized responses. Here too, there seems to be a clear need to balance anti-trafficking imperatives with an awareness of other potentially competing risks and harms. Notably, the UK Government continues to invoke anti-trafficking rhetoric to excuse much-publicized delays in visa processing and blocking unaccompanied minors from traveling (e.g., Townsend, 2022a).

In emphasizing the importance of thinking about risk in a nuanced way, participants also discussed various sources of resilience to trafficking and exploitation. Participants argued that there is variation in risk *between* places within Ukraine as well as beyond it, that people fleeing the war in Ukraine are heterogenous, and that risk itself is dynamic.

. . . migrants and refugees from Ukraine are not a homogenous category . . . and while we speak about vulnerabilities and who is most vulnerable to human trafficking it is also important to look at the success stories . . . this is in fact very important to see what makes this crucial difference in ensuring that people who flee their homes are safe, are protected, are integrated. – Dr Anastasia Riabchuk, National University of Kyiv-Mohyla Academy

Often . . . we talk about risk as quite static listed attributes that a person holds, and in a crisis setting things move quite quickly and can be quite dynamic for people, and so how do we make sure our response is kind of as agile and quick to respond to these changing risk factors that refugees are navigating? – Academic

Dr Riabchuk, a Ukrainian academic with direct personal and professional experience of navigating war and displacement in Ukraine, also stressed the importance of safe spaces for displaced people both within and beyond Ukraine, to pause, regroup and make an onward plan, both for their general wellbeing and to mitigate risks of exploitation:

... one thing that really makes a big difference, is having a plan. Of course, it's very difficult to plan an escape from war, especially if your home is destroyed, if you're in danger, so it's not a very good environment to be thinking about something or planning ... So, it's very important to have this space to take a break and where people feel that they don't have to rush and take these decisions really quickly because if they don't, they're dead, right? So just making sure there are these safe spaces along the way. – Dr Anastasia Riabchuk, National University of Kyiv-Mohyla Academy

She and other participants also stressed the protective value of ensuring refugees can make use of necessary “social infrastructure for integration,” for example, via ready access to the labor market, the benefits system, education, and healthcare. As an illustrative case, she stressed how enabling displaced people to enroll their children in school easily and quickly has the dual benefit of giving children much-needed routine and freeing up adults to deal with other pressing issues. Given the prevailing demographics of those fleeing Ukraine, particular value was placed on destination countries supporting families to integrate. Additionally, numerous participants saw trauma as a key issue to consider in responding to those fleeing Ukraine (see also, Hoff & de Volder, 2022). While calling for trauma-informed provisions in the UK, some also cautioned against exceptionalizing standard human reactions to horrendous experiences.

It's really important for us not to over-medicalize and over-pathologize how people are responding very appropriately to pain, to danger, to grief, to uncertainty. It can be really unhelpful when we're trying to build and encourage resilience to make populations feel that they are broken and in need of fixing, to hold people in a sense of feeling that they're damaged or disordered or weak or helpless, or that their only hope is at some point in the future having one to one psychological therapy. – Dr Laura Wood, doctor and researcher at the Helen Bamber Foundation and VITA

The Protective Value of Visa-Free Responses to Refugees

The decision of many European countries (the UK not included) to grant visa-free access to Ukrainians⁹ was widely characterized as a crucial source of resilience against trafficking and exploitation, for two main reasons. First, because it enables Ukrainians fleeing the war to access work, healthcare, education, etc., as rapidly and easily as possible, which is beneficial for them in general and seen as a protective factor against trafficking and exploitation more specifically. Second, because a visa-free policy reduces the need to travel by irregular routes (e.g., using smugglers), which can itself increase exposure to risks of trafficking and exploitation.

We know that people being able to travel regularly, legally and cheaply without ever having to use a smuggler is in itself a source of resilience to trafficking. That's excellent, that's something that, you know, we've advocated for a long time, and we can only hope that we learn from this experience that it is possible and that we expand this possibility to more people who are fleeing conflict and persecution ... if people can get status immediately, they travel legally, they get legal status as quickly as possible and therefore the adults, the women can access the labor market, people who are not in a position to work can access important support and children can access education, healthcare and so on. So, these are all key factors of resilience. – Dr Claire Healy, UNODC

⁹The European Union (EU) activated the 2001 Temporary Protection Directive for the first time on 4 March 2022. It was described at the event as “a directive that was in place for exactly this kind of situation, for arrivals of large numbers of people seeking protection where we knew in advance that the asylum system would break down if everybody had to apply” (Dr Healy, UNODC).

Forgotten Refugees in This War

Although the EU's response to Ukrainian refugees was widely praised, several roundtable participants also stressed that its approach is exclusionary, with many non-Ukrainians fleeing the same war being denied equivalent rights and protections.¹⁰ For context, at the start of 2022 there were an estimated 470,000 non-Ukrainian residents in Ukraine (UNOCHA, 2022). Participants raised concerns about both the fundamental inequity in responses and the implications for heightened risks of trafficking and exploitation among non-Ukrainians fleeing Ukraine, points which are echoed by Hoff and de Volder (2022). For example, one group highlighted at the roundtable as being at "considerable risk of being manipulated and exploited" (Dr Laura Wood, doctor and researcher) was overseas students at Ukrainian universities, who numbered over 80,000 in 2019 (Erudera, 2022). The EU's far less welcoming response to non-Ukrainians fleeing Ukraine is clearly much more in keeping with the restrictive migration policy regime that has led it to be dubbed 'Fortress Europe' (see, e.g., Carr, 2012; Hayden, 2022).

Similarly, several participants emphasized how the EU and UK were responding differently to Ukrainian refugees than they had to refugees from other major conflicts (e.g., Syria). The stark divergence in responses to Ukraine versus other refugee 'crises' has been critiqued at length elsewhere (see, e.g., Reilly & Flynn, 2022). As Dr. Idrees Ahmad (University of Stirling) flagged at the roundtable, not only have routes to safety previously been extremely limited but EU countries actively prosecuted "people who were trying to help refugees using human trafficking law, so entirely blurring the distinction between predators and those who were trying to assist people who were vulnerable" (see, e.g., Dearden, 2016; Stamatoukou, 2021). Recent reports from Poland indicate that such punitive measures and schism in responses persist, with the Polish authorities criminalizing attempts to help (mostly Middle Eastern) refugees stranded on the Polish-Belarusian border, while simultaneously embracing volunteer support on the Polish-Ukrainian border (Fallon, 2022). There has also been widespread critique of racism both in media reporting on Ukraine and in the treatment of Black and other racialized people fleeing the war (see, e.g., Howard et al., 2022).

The UK's Visa-based Response to People Fleeing the War in Ukraine Was Seen as Risky and Lacking in Clarity, Resourcing and Accountability

Considerable discussion centered on the UK's domestic response to the war in Ukraine, with major concerns raised about the design and implementation of all three Ukraine-specific visa schemes. For brevity's sake, we focus here on overarching concerns and on those particular to the *Homes for Ukraine*, as it has the biggest profile and reach and was the most roundly criticized at the roundtable (for detail on the various schemes, see, Cockbain & Sidebottom, 2022).

The Ways in Which the UK's Fundamental Requirement for Visas is Seen to Heighten Risks of Trafficking and Exploitation

At the time of the roundtable, the UK Government had announced three Ukraine-specific visa schemes and implemented two: the *Ukraine Family Scheme* (allowing for reunification with a family member in the UK); *Homes for Ukraine* (formally, the *Ukraine Sponsorship Scheme*, under which members of the public can host Ukrainians and their family members in their home); and the *Ukraine Extension Scheme* (from 3 May 2022, open to certain Ukrainians already in the UK, including many thousands in the UK on highly restrictive *Seasonal Worker Visas*). All three schemes are subject to various eligibility constraints, and the system is complex and rapidly evolving.

¹⁰At our roundtable, participants tended to focus on the exclusion of non-Ukrainians, whereas others have suggested that there are in fact equivalent entitlements in law, but that these are proving difficult to exercise in practice (Hoff & de Volder, 2022).

Several participants questioned the rationale behind requiring visas of Ukrainians at all, which some saw as the product of longstanding political preoccupation with keeping migration numbers to the UK down (see, e.g., Yeo, 2022). As one participant put it:

... what binds together many of the issues being discussed is the government's decision to treat this as a problem of immigration control rather than a humanitarian crisis – a decision to prioritize the (perceived) interests of the UK in controlling who comes here over the interests of the people most affected ... – Barrister

Relatedly, a stark divide between the UK's foreign and domestic policy responses to Ukraine was highlighted:

In terms of foreign policy, the aid to Ukraine and especially the military aid has been pretty strong, but domestic policy has dragged its feet because it's responding to very different constituencies and concerns – well, the same constituencies probably that enabled Brexit. – Dr. Idrees Ahmad, University of Stirling

The UK's approach to Ukrainians was typically characterized by participants as far slower, more restrictive, and more unwieldy than the EU's open borders policy. Going further, several participants suggested that the visa requirement actively exacerbates risks of trafficking and exploitation, due both to the confusion and long waiting times associated with visa processing and the way it can propel people into more dangerous situations and routes.

... our main concern is around the fact that that's [visas] a barrier to accessing safety and we're already responding to incidents where people have had to take alternative routes and have been subject to exploitation and abuse because of that. – NGO

... it's meant that people have been waiting in third countries or in dangerous situations in Ukraine for these visa decisions to be made. I've spoken to people who've been sleeping in their cars, who've travelled through four different countries because they've been sent from one visa application centre to another. Initially people didn't realize the UK hadn't opened its borders, so they'd go and literally try and board a Eurostar, having driven from Ukraine, Poland, etc, and then exhaustedly be turned away and not know what to do and be given conflicting advice from French and British immigration officers in France. So, we've seen people who are running out of money while they're waiting for a visa application - it can take weeks for a UK visa application to be granted in Ukrainian cases at the moment - and the people are seeking help locally, but they are at risk of being preyed upon by unscrupulous people in that situation or falling into other abusive situations. – Jennifer Blair, Barrister and Co-Founder of the Ukraine Advice Project (which offers free legal advice to those fleeing the war).

The logic behind the decision to create entirely new systems in response to Ukraine rather than utilizing existing ones was also questioned, with reference to major problems when doing so in response to other conflicts (e.g., Syria).

We seem to be going down a particular road of creating new systems that are parallel or in addition to the generalized systems. Now, I think that's potentially adding to the risk of harm and exploitation. I think that's the evidence we need to try and collect because it does feel like there's a repetition of mistakes that were made during the Syrian refugee crisis where, again, there was a parallel system created. – Academic

Participants also flagged specific concerns over crossings between the Republic of Ireland and Northern Ireland, where the EU's visa-free and the UK's visa-requiring systems collide.¹¹ Participants stressed that Ukrainians entering the UK there risk becoming undocumented (particularly if they then move on to the island of Great Britain), thereby disappearing off the radar and losing access to important social infrastructure: factors seen greatly to increase risks of trafficking and exploitation. Several participants reported having already heard anecdotal accounts of Ukrainians being trafficked into the UK through this route, including minors.

Another common criticism of the UK's visa-based response was that various groups may fall through the gaps, rendering them precarious and thus particularly vulnerable to exploitation. The key example discussed in the roundtable was the large number of Ukrainians already in the UK on the

¹¹Here in the "Common Travel Area" there are no routine passport controls and an estimated 110 million person crossings a year (HM Government, 2017).

Seasonal Worker Visa,¹² particularly those ineligible for new visa provisions¹³ (see, FLEX, 2022). Ukrainian seasonal workers were widely described as having *already* been at particular risk of trafficking and exploitation (see, FLEX & Fife Migrants Forum, 2021), with the war then exacerbating their vulnerability in a key example of new and existing risks interacting. Dr. Olivia Vicol, with the Work Rights Center remarked, “. . . the risk of exploitation is real, and it is high, and our Russian and Ukrainian caseworker appears to be witnessing it in real time.”

While participants typically expressed frustration and concern overall about the UK’s “*visa insistence*,” the Independent Anti-Slavery Commissioner was anomalous in seeing a potential opportunity here. Informed by recent conversations about Ukraine with her European anti-trafficking counterparts, she proposed (recognizing the argument as controversial) that the UK had at least an opportunity for monitoring and early intervention upon which it should capitalize.

Most countries in Europe have no visas and dispersed refugees and so from their perspective that makes it very difficult to provide support and to monitor the situation. So at least we have that advantage and I think it’s very important that we don’t squander that advantage because we have a better chance of protecting people over the medium to long term. – Dame Sara Thornton, Independent Anti-Slavery Commissioner

Notably, no other participants voiced a similar view, and some expressed polite skepticism toward this position during later breakout room discussions.

A Lack of Clarity, Transparency, Accountability and Resourcing in the Overall UK Response

Participants commonly expressed frustration with how the UK Government was responding to Ukrainians¹⁴ seeking sanctuary in the UK, describing the overall UK response as fragmented and confusing. Specific concerns were raised about the lack of clear provisions for marginalized and/or vulnerable groups, with tangible examples cited.

. . . there’s been very little planning, and really no planning on the UK side, about how to meet the needs of more vulnerable populations. – Barrister

I’m working with a gentleman who was trafficked previously. He’s a Ukrainian man who was trafficked in the UK in the construction industry in the past. His nephew is sponsoring him under the Ukraine Family Scheme but his nephew’s not going to house him. The man’s got quite complicated needs and his nephew barely knows him, I think, but he’s happy to help him with the visa. But he’s somebody who will need wraparound support when his visa is granted, he’s not just going to be going to work on Monday and renting privately on his own, he would need all of that arranged for him and there’s not really any provision for that. – Jennifer Blair, Barrister and Co-Founder of the Ukraine Advice Project

Many concerns centered on the lack of funding, information and support for local authorities in particular, upon whom much of the practical responsibility for providing basics for people fleeing this conflict will fall (e.g., in terms of access to schools, public healthcare, emergency housing and other social support). Participants spoke of a worrying disparity between schemes: local authorities are

¹²This is a six-month visa, mostly for agriculture and horticulture, that ties its holders to a given labor provider. In 2021, nearly 20,000 *Seasonal Worker Visas* were granted to Ukrainians (67% of the overall total for this quota-restricted scheme; Home Office, 2022).

¹³Participants described a major *volte-face* from the UK Government, which had originally simply extended the visas but maintained their extremely restrictive conditions, but then switched track and announced a new scheme: the *Ukraine Extension Scheme*, to which seasonal workers would be able to apply and which would grant a three-year stay, free access to the labor market, social security etc. Although welcomed as a “*massive change in circumstances*” (NGO), participants still had major concerns, including around strict eligibility criteria that excluded, for example, Ukrainians undocumented in the UK prior to 1 January 2022. The long delay ahead of opening the new scheme was also seen to put people at risk of ongoing exploitation in their existing work, be it regular work under the visa or in the gray economy having left exploitative placements. Moreover, the lack of financial, housing or other practical support for those moving onto the *Ukraine Extension Scheme* was said to create new risks of exploitation as people in a hyper-precarious situation struggle to raise funds and secure accommodation that allows them to sponsor family members to join them. See, Cockbain and Sidebottom (2022) for further discussion.

¹⁴The Ukraine-specific visa schemes are all geared toward Ukrainian nationals, whereby non-Ukrainians also fleeing the war in Ukraine are only eligible under very specific circumstances (they must both be accompanying immediate family members who are Ukrainian nationals and themselves meet the scheme-specific requirements around residence in Ukraine).

allocated £10,500 central funding per person settling in their area under *Homes for Ukraine* so as to help with providing such services, but no equivalent payment happens for people in their area under the other Ukraine-specific schemes.¹⁵ There were widespread concerns that local authorities are under-resourced and under-supported to cope with new arrivals, many of whom may have complex needs. For example, fears were raised that the National Health Service (NHS) would not be able to meet new arrivals' health needs, especially in terms of trauma-related mental health services. Notably, such points were never raised in a way that implied refugees should not be welcomed. Finally, some participants emphasized that Scotland is doing things differently not to other countries in the UK in response to Ukraine, describing what seemed to be a more co-ordinated and strategic approach.¹⁶ Pertinent examples included central funding for targeted legal advice and resources around work for Ukrainians in Scotland.

Specific Concerns about Exploitation in What was Widely Seen as a Poorly Designed and Implemented Community Hosting Scheme

Homes for Ukraine is a community hosting scheme, unprecedented in its scale, that relies on members of the public volunteering to host Ukrainians and their family members in their spare rooms or separate properties. Hosts act as visa sponsors and guarantee (although, critically, not in any legally enforceable way) free accommodation for at least six months and receive a £350/month 'thank you' payment from the UK Government; ensuring accommodation at scale amid a national housing shortage, and for relatively little money. The scheme met with an immediate outpouring of support: over 100,000 people registered their interest in the first 24 hours (Elgot, 2022). Roundtable participants, however, raised numerous, recurrent, and serious concerns about the planning, implementation and oversight of *Homes for Ukraine* from a trafficking and exploitation perspective.

... it's easy to see how the fast-tracking of the Home for Ukraine Scheme has created a scenario where exploitative situations can arise and potentially thrive. – NGO

We're concerned in terms of the matching scheme, about the checks that have been done and the accountability around that in terms of the process and in what order those checks are happening, are they happening in time, and then about the onward escalation process when hosting placements do fall down and access to mainstream accommodation at that point – will the local authorities be able to provide that, given the numbers? – NGO

Participants were not opposed to community hosting *per se*, but rather were concerned that risks of exploitation had been overlooked or ignored, and that there was too little forward planning and mitigations. Many stressed that hosts had been inadequately prepared and informed, with a clear lack of expectation management, training, guidance, and support. Additional concerns were raised that the payment for hosting might incentivize sponsorship among people who are, at best, naïve and ill-equipped and, at worst, unscrupulous and actively seeking to exploit refugees.

There are so many people who do want to be generous and do the right thing, but we all know that there are people who are looking at this as a ripe pickings opportunity for criminality. – Barrister

Domestic servitude featured most prominently in participants' concerns about exploitation/trafficking within the *Homes for Ukraine* scheme. Fears were also raised that hosts might seek to exploit their guests in other labor markets, for their benefit entitlements,¹⁷ sexually, and/or otherwise. Concerns about hosts exploiting guests in such ways resonate with issues already encountered in Poland

¹⁵Although not mentioned at the roundtable, a similarly troubling and unexplained discrepancy exists in that people coming under *Homes for Ukraine* receive a one-off £200 per person payment to keep themselves, but the same is *not* extended to those on the other Ukraine-specific visa schemes.

¹⁶The UK is made up of four countries and the devolved administrations in Scotland, Wales and Northern Ireland have a range of different powers. Immigration law, critically, is governed centrally.

¹⁷Here, it is notable that known or suspected benefits-related exploitation has featured heavily in the experiences of many EU nationals trafficked in the UK (see, Cockbain et al., 2022).

(Human Rights Watch, 2022a). Notably, Hoff and de Volder (2022) reported that most of the stakeholders they interviewed were more concerned about risks to women of trafficking for labor exploitation (including in domestic work) than for sexual exploitation, showing a mismatch between the media focus and professionals' concerns.

Several roundtable participants drew a distinction between actively predatory hosts and more opportunistic ones. There were particular concerns that conditions could erode subtly and gradually, becoming increasingly exploitative over time. Here, various potential contributing factors were highlighted, including language barriers, differences in cultural expectations, inherent power imbalances, economic constraints, and lack of access to alternatives should things go wrong. The absence of clear boundary setting in the UK Government guidance around, say, what chores and contributions to bills were permissible under this scheme was seen to heighten risks of hosts exploiting their guests for domestic labor.

To me the biggest concern is the sort of medium/long term perspective and that so far there don't seem to be any formalized processes for monitoring and safeguarding in the medium to long term. I think the problem with these placements in private households is also this slipping of burdens that at first might not be exploitation but then there's an increase in burdens placed and because it is a slipping process, and it is within what is the home there is a tendency to not sort of see those processes. – Academic

... the welcome guide they've [the UK Government] given at the moment when they come for the Homes for Ukraine Scheme tells people that they can be expected to help with household chores and pay a contribution towards household bills, which I think is very dodgy; I think it needs a much clearer line on what's allowed and what's not allowed. Because there are people who live near me, and I live in a rural area, who are clearly thinking it would be nice to get some Ukrainians to use their holiday lets when they're not in use, they'd get some money for it, and they could do some housework – it's like getting a free au pair. – Barrister

Numerous participants criticized a lack of clarity around eligibility and vetting procedures. The application form for the *Homes for Ukraine* scheme was itself also described as unduly complex and time-consuming: “it needs simplification, and it needs a bit more clarity” (Police). There was also evidence of confusion and misunderstanding both among participants and the public with whom they worked, particularly in terms of suitability checks, and whether unaccompanied minors can be placed through this scheme. According to a government official at the roundtable they cannot, and the UK immigration rules stated that children can only be granted visas if they are traveling with or joining a legal guardian. We heard, however, conflicting accounts at the roundtable about what is happening to visa applications from children in practice, and it was unclear whether separated and unaccompanied minors are routinely having cases granted outside the main rules. Jennifer Blair from the Ukraine Advice Project highlighted situations in which Ukrainians already in the UK were struggling to find routes by which they would be eligible to bring their children over and were therefore considering “entering into very difficult agreements with people so that someone else will bring their child to the UK.” The confusion caused by the lack of clarity in UK Government communications has since been reported to have left children stranded in dangerous and difficult situations, and the UK Government later announced it will be processing (some) *Homes for Ukraine* applications from unaccompanied minors (Collinson & Polachowska, 2022). At the roundtable, as in so many other areas discussed, there was a recognition that competing risks and concerns must be carefully balanced where unaccompanied minors are concerned, rather than an anti-trafficking logic trumping all else. As mentioned at the roundtable, there is a documented history of unaccompanied minors and trafficked children going missing at high rates from local authority care in the UK (ECPAT UK & Missing People, 2016). Yet, as one participant later said, simply stopping unaccompanied minors from traveling to safety is not safeguarding them either. Overall, worries around vetting and risks within hosting placements resonate with previous publications focused on countries bordering Ukraine (Hoff & de Volder, 2022; Human Rights Watch, 2022a; Kumar et al., 2022).

As noted at the roundtable, the Scottish Government now acts as a ‘super sponsor,’ meaning Ukrainians can apply to come to Scotland without having a named host and be assigned one locally (Wales then did the same but has since paused the offer). Those applying under the *Homes for Ukraine*

scheme elsewhere in the UK, however, must first find a match themselves. The matching process was a particular concern for many roundtable participants, with the onus on individuals and lack of centralized support to connect hosts and guests perceived as a major source of risk for trafficking and exploitation. Participants were particularly concerned that this gap meant would-be sponsors and guests were oftentimes turning to strangers on social media to find matches: a move seen by many as understandable but highly risky (Hoff and de Volder [2022] flagged similar issues). Matching on Facebook, for example, was described by one NGO participant as “an invitation to traffickers.” An academic also flagged examples of specific posts seen on an international matching site, which offered accommodation in the UK on worrying terms.¹⁸ “I’ll be honest, we’ve been horrified at the matching,” stated an NGO representative.

Some people obviously already had friends here they could stay with, but many didn’t, and they had been waiting for the scheme which had been mentioned a lot by the Government in the media. So, people have approached organizations to help them match, churches, things like that, but also have been self-matching on social media But the Facebook groups, it will be people sharing a photograph, a few words about themselves and it very much feels like a kind of dating website; lots of people getting back to them and saying, ‘Oh yes, I’ll have you’ kind of thing. – Jennifer Blair, Barrister and Co-Founder of the Ukraine Advice Project

Would-be hosts are then required to undergo checks both on their own criminal histories (‘Disclosure and Barring Service’ or ‘DBS’ checks) and the accommodation on offer. Participants in different regions in the UK reported, however, that local authorities were struggling with insufficient, unclear and/or inaccurate information around checks and were limited in what they could do should issues arise – particularly if guests were already there.

. . . there isn’t a lot of clarity on when these checks will happen and how . . . also some local authorities have fed back that for some sponsors they think that the check has to happen before but that’s not actually the case . . . then also what powers actually local authorities have if they find that those checks sort of upturn problems. They actually don’t have a lot of levers that they can pull at that point. – Academic

. . . the main concerns that are coming through for us from local authorities are the checks that they need to do on the hosts under the Homes for Ukraine Scheme. So, there’s quite a lack of clarity about what checks are being done when people are coming in and at what stage the DBS checks should be done by the local authorities. There’s a lack of information coming through to the local authorities which means that often when they’re deciding which level of DBS check to do . . . For example, if they’re told that a single adult is coming through, they’ll do the lower level of DBS check but then on visiting that person they’ve discovered that that person has children with them so, you know, inappropriate checks have been done. – Community partnership

Numerous participants from different professional backgrounds expressed concerns about the lack of clarity and accountability in terms of longer-term and/or ongoing monitoring of placements and of provisions for flagging, escalating and addressing concerns. Specific issues were raised around safeguarding gaps for children and other vulnerable populations, and an apparent lack of planning and resourcing should placements break down.

Within the current schemes, safeguarding in this process seems to be quite vague. We live in a country where UK-born children regularly die or experience abuse within their homes and my concern is the lack of monitoring, the lack of vetting . . . We have the DBS scheme but it’s only the people who are caught who show up in DBS safeguards. – Academic

. . . we’re also really concerned about the potential for the breakdown in host and guest relationships and what happens when people leave their host family situation. They’re not compelled to remain in that situation for their visa requirement so we’re really worried that we’re just going to lose people when they leave those situations. They’re going to be very vulnerable to be going to other people’s houses and just kind of going off the radar really. – Community partnership

¹⁸For example, there were posts explicitly seeking an orphaned child or where the offer of “accommodation” was actually live-in care work. While clearly not representative, the presence of such adverts raises obvious concerns of exploitative intent.

Importantly, participants reported being aware of *Homes for Ukraine* placements that had already broken down. In light of the ongoing housing shortage in the UK, participants were concerned about who would be responsible for alternative housing provisions when placements are unsuitable or break down – and how they would be able to meet these needs in practice.

... we have heard that Ukrainian families are already presenting as homeless in some local authorities. Six months is a long time to sign up to host somebody and as far as we can work out there's no back-up for what happens if it goes wrong, although on paper there is. But in reality, there is a housing shortage, as we probably all know, and there's already thousands and thousands of Afghans waiting for housing in hotels, so what happens if a hosting placement goes wrong, where are the Ukrainian people going to go? – NGO

These concerns proved prescient: by 3 June 2022 in England alone, 145 *Homes for Ukraine* scheme placements were confirmed to have ended in homelessness, due to a mix of placements breaking down and having been unsuitable or unavailable in the first place (Department for Levelling Up, Housing and Communities, 2022a). Many local authorities have reportedly not been trying to match such Ukrainians with new hosts but rather putting them in hostels and hotels, “just as happened with Afghan refugees” (Dugan, 2022b). The use of such accommodation for traumatized individuals fleeing conflict, particularly those with families, has been squarely criticized – yet thousands of Afghans have been left there indefinitely (Taylor, 2022).

Information Gaps and Information Overloads Can Exacerbate Risks of Trafficking and Exploitation and Impede Responses

Roundtable participants shared the view that helpful, accessible information was vital to support various constituencies in the UK, in particular Ukrainians themselves, but also hosts, local authorities and businesses. If communicated effectively – *not* seen to be the case at present – such information was understood as an important mechanism to help Ukrainians establish themselves in general, to raise awareness more specifically of risks of trafficking and exploitation, and to ensure people know where to access support if things go wrong.

... there's a lack of appropriate materials out there in terms of what people's rights and entitlements are when they come to the UK and signposting people to the appropriate authorities to exercise those rights and entitlements ... We've suggested that there's a need for a welcome pack for anyone who's been placed in the UK under the [Homes for Ukraine] scheme so that they can access those rights and entitlements fully. – NGO

Although an official UK government ‘welcome pack’ for Ukrainians arriving in the UK was released on 29 March 2022 (Department for Levelling Up, Housing and Communities, 2022b), participants seemed either unaware of its existence or, in the case of the two who did mention it, thought it inadequate.

So, they've given people this welcome guide which explains they have rights and labor rights and this and that, but it doesn't tell them how to check that out. – Barrister

Civil society participants in particular, but also others (e.g., from law enforcement and business), drew attention to numerous different guides, flyers, resources and other information and awareness-raising initiatives being developed and deployed in response to the war in Ukraine. Some international participants also flagged that there is already extensive messaging in Ukraine and bordering countries around trafficking risks. Overall, there was clear evidence of goodwill and a genuine desire to help. Participants identified, however, three major points of caution around information. First, they stressed that it is insufficient just to raise awareness about trafficking and exploitation without also explaining and investing in safer options and routes to support as needed. This point resonates with long-standing critiques of anti-trafficking's reliance on awareness-raising campaigns as a key prevention strategy, despite a stark lack of evidence of their efficacy (Mendel et al., 2020; Tjaden et al., 2018).

... telling people you might be exploited isn't that great if you don't tell them what to do about it when they are being [exploited] and they haven't got a way of getting out of it. – Barrister

Second, participants emphasized that simply promoting, say, phone numbers for helplines is insufficient if the reasons for and the benefits of getting in touch are not made clear, and the promoted support services are not adequately resourced to deal with a surge in contacts (see, also OSCE, 2022). Third, participants cautioned that with increased activity in this area there is a risk of duplication, information overload and resources becoming fragmented, decentralized and hard to find. Participants thus talked of the trade-offs (and associated risks) of relevant parties being under-supported with information or overloaded with excessive and/or potentially conflicting or inaccurate resources.

I'm concerned that there may be an oversaturation of information . . . it feels like there's a lot of kind of instinct at the moment, especially from consortia . . . to sort of just list all of the possible organizations that may be relevant for people to get in contact with . . . without actually thinking what that journey is going to be like for the person trying to navigate an already very complex thing. – NGO

Consequently, a compelling case was made to be more focused, judicious and selective in terms of information-sharing, scaling back and thinking critically about what is trying to be achieved, who can best help and how to make the pathways to support smoother in practice.

Us as professionals are finding it hard to understand the different routes and the possible responses, how dangerous it is for people who have very few resources and are in a desperate situation just being signposted back and forth, so the need to really coordinate the response and simplify it better and only signpost directly to organizations that can help. – NGO

Roundtable participants also emphasized the importance of accessibility, both in terms of online and offline options and translations into relevant languages. Ukrainian participants felt it was particularly vital that information came from trusted, official sources. Some participants emphasized that advice should be formulated in a way that it does not only focus on the extremes of exploitation, which could be off-putting for those who do not identify with labels such as 'human trafficking' and 'modern slavery.'

We've tried to pitch the leaflet so it's not like too high a bar, so more like if you feel uncomfortable, if the relationships are beginning to kind of degrade and stuff, this is where you can go, and there's a list of organizations that you can go to for help, ranging from, you know, local authorities to Police Scotland in the most extreme instances. – Civil servant

Overall, the emphasis on effective communication of key information resonates with Hoff and de Volder's (2022, p. 3) conclusions that a dearth of reliable information is a major shortcoming in anti-trafficking responses to Ukraine, whereby "an uncoordinated proliferation of information provided by many different actors is creating confusion and misinformation for people who are already distressed and disoriented." They also pinpoint as a key problem a lack of effective coordination as anti-trafficking activity proliferates in major receiving countries.

Insecurity, Fear and the UK's Broader Political Climate Around Immigration and Asylum Create Difficult Conditions in Which to Respond

Roundtable participants emphasized that the UK's response to refugees from Ukraine must be understood against its broader approach to refugees, asylum, trafficking and exploitation. They frequently stressed that immigration insecurity drives trafficking and exploitation, and saw the UK's 'Hostile Environment'¹⁹ as compounding risk and impeding responses. The ostensibly supportive response to Ukrainians was described as fundamentally jarring with a wider climate of anti-immigrant

¹⁹The UK Government itself has shifted away from the term, and now prefers the 'Compliant Environment'. Nevertheless, the phrase 'Hostile Environment' remains widely used and was what participants themselves said. According to the Joint Council for the Welfare of Immigrants (no date), "Some use the term "Hostile Environment" to describe all policies which make life difficult for migrants living in the UK – treating them as less deserving of dignity and humanity than British citizens. More specifically, it is a set of policies introduced in 2012 by then-Home Secretary Theresa May, with the aim of making life unbearably difficult in the UK for those who cannot show the right paperwork. Or, as she said at the time; "The aim is to create, here in Britain, a really hostile environment for illegal immigrants."

policy and rhetoric. Moreover, little trust was expressed that the Home Office would treat people fleeing Ukraine compassionately should their status be(come) irregular.

It's like a social switch that needs to be flicked because the narrative has been so strong over so many years. I find it quite challenging to think about how these things will operate in a way in which they're meant to operate, so the hosting scheme and so on, when the overarching framing of provisions for refugees and people seeking asylum has been so poor for so long. – Academic

Like certainly we're hearing from the Home Office a lot of, you know, 'We can be flexible, we will consider people outside the rules,' completely ignoring the Hostile Environment that's been created and how, you know, that's really not enough trust for people to come forward. – NGO

Participants' concerns about the corrosive impacts of the 'Hostile Environment' on the UK's response to people fleeing Ukraine (and elsewhere) should be understood in the context of concurrent developments in UK immigration policy. Despite superficially rebranding it as the 'Compliant Environment,' the ruling Conservative Party has dramatically escalated the 'Hostile Environment' of late: most notably via the new Nationality and Borders Act 2022, enacted soon after the roundtable, and recent attempts to deport asylum-seekers to Rwanda. These draconian measures have been widely criticized in the anti-trafficking sector and beyond as being inherently inhumane, flouting international refugee and human rights law, and actively fueling trafficking and exploitation risks (see, e.g., Breese, 2021; Simpson, 2022; Taylor et al., 2022).

While the term "*refugee*" was widely used in the roundtable, participants seemed well-aware that Ukrainians will *not* typically be processed as refugees through the UK's asylum system. Participants highlighted deficiencies in the asylum system, such as long waits, meager support payments and no right to work, as particularly salient for those falling through the gaps in current Ukraine-specific schemes: for them, seeking asylum is the only possible route to regular immigration status.²⁰ The "hyper-precarity" of asylum seekers that renders them acutely vulnerable to exploitation is well-documented (Lewis et al., 2014, 2015). Several participants suggested that efforts to tackle trafficking and exploitation in relation to the war in Ukraine are inextricably linked to a broader need to dismantle the 'Hostile Environment' and improve the UK asylum system at large. Some explicitly expressed discomfort with the differential treatment of refugees according to their country of origin, as is clearly happening with Ukraine.

To me, there is a fundamental issue about how we respond as a system and nation to all conflicts. We need to really push on reframing migration, seeking asylum as a starting point so that all people from all places have access to safe, fulfilling lives. Refugees should be treated equitably, wherever they come from. Responses by nation encourage inequity of treatment, outcomes etc. – Academic

It has to happen not only by widening the goalposts of the three visa schemes in response to pressure from civil society but also by fixing the asylum system because no one should have to wait for four or five months for an initial screening interview and have to make ends meet in the meantime by working precariously. – Dr. Olivia Vicol, Work Rights Centre

Concerns about the UK's 'Hostile Environment' were also raised in relation to reporting. Participants from the police and labor enforcement strongly emphasized the importance of trafficking, 'modern slavery' and other exploitation being reported to the relevant authorities, saying that such information too often did not reach them:

... what we need as a police force is reporting, we need people to come back to us and tell us about exploitations... I'm concerned that we hear lots of anecdotal evidence but very little of it is then tracked back to ourselves and we are one of the bodies who can do something about it. – Police officer

Yet, several other participants emphasized various practical barriers to reporting trafficking/exploitation, be it as victims or witnesses. Some such issues were attributed to control mechanisms used to

²⁰The key groups mentioned were non-Ukrainians (e.g., international students), Ukrainians undocumented in the UK pre 01.01.22 and Ukrainians whose status becomes irregular in the future.

exploit people. For example, a different police participant gave examples from their recent experiences working with other (non-Ukrainian) Eastern Europeans who had been trafficked:

... in both cases victims were too afraid to ask for help and did not know that help was available. The perpetrators have told them that if they did go to the police they would not be believed and that their families/children would be hurt if they were to speak up. – Police officer

Other issues, however, centered more around law enforcement capacity, constraints and responses. Participants questioned, for example, whether police and labor enforcement bodies respond adequately to reports, citing both general issues with under-funding of labor inspectorates and specific experiences in which concerns had been dismissed, minimized and/or not pursued further. For example, when a police officer asserted in a breakout group that “we are very trauma-informed, victim-centred now when it comes to dealing with victims of trafficking, and exploitation in particular,” other participants described encountering problems in practice. These points resonate with the wider evidence-base around barriers to identifying and reporting trafficking, and documented shortcomings in UK law enforcement responses (Cockbain et al., 2022, 2020; HMICFRS, 2017). Directly linked to the ‘Hostile Environment,’ participants also suggested that sharing personal data between law enforcement and immigration enforcement may deter Ukrainians with irregular status from reporting trafficking/exploitation as it puts them at risk of deportation. Elsewhere, such problems have long been highlighted, with thus-far unmet calls for a protective firewall to protect victims and witnesses of crime from having their personal data shared onwards (FLEX & LAWRS, 2022).

... police can share data on immigration status with the Home Office and I think that can be a real, you know, barrier to people wanting to report if their status is insecure ... undocumented people are in such a vulnerable situation then if reporting it is going to lead to them basically, you know, perhaps being detained or deported because there isn’t a way to extend it, then it makes it particularly important, you know, to be able to report securely. – Academic

Some participants flagged concerns about whether undocumented Ukrainians would be treated compassionately by the Home Office even if formally identified as ‘modern slavery’ victims through the UK’s National Referral Mechanism (NRM) system. Although specific expectations differed, they were united by a bleak outlook and lack of confidence.

If and when people do get recognized as victims of trafficking, they’re not necessarily going to get protection from the immigration system and they’re likely to be detained and deported, particularly if there’s any criminality involved in their experience of trafficking. That’s just because of ... the way the system works in the UK, it’s not very protective. –NGO

Unfortunately, what’s likely to happen I think is that that person would then remain in this sort of undocumented sort of limbo status, which is a disaster, you know, because they couldn’t actually be deported but they may not get appropriate status. – Transnational organization

In light of such concerns, several participants stressed the importance of also having alternative pathways to support in the case of trafficking and exploitation. This point ties in with broader discussions about the need to recognize the limitations to law enforcement responses to various forms of trafficking and exploitation and enable grass-roots organizations and other initiatives that center the interests and voices of those affected (see, e.g., Cockbain & Tufail, 2020).

... [there’s] a question about who is ... best placed to reach individuals that are particularly at risk and the importance of ... organizations that involve Ukrainian nationals as well, migrant-led or Ukrainian-led organizations. – NGO

If they face any kind for exploitation along the way, instead of going directly to the authorities, which they might be more concerned about, if there are intermediaries who are more trustworthy and who people don’t fear as much. – Dr. Idrees Ahmad, University of Stirling

Longer-Term Strategic Planning Is Vital but Seems to Be Lacking in the UK to Date

As well as arguing for effective crisis interventions, roundtable participants repeatedly called for longer-term strategic planning to meet refugees' needs in general and address risks of trafficking and exploitation in particular. Many felt that neither was particularly strong in the UK's domestic policy response thus far, with the potential exception of Scotland. Drawing lessons from other wars and the past eight years of conflict in Ukraine, participants cautioned against the dangers of not preparing to host refugees beyond the short-term, relying too heavily on humanitarian aid organizations over state actors, and assuming current levels of public compassion toward Ukrainians will last indefinitely. The risk of "compassion fatigue" is particularly pertinent in light of the UK's history of xenophobia toward Eastern European migrants (Ahmad, 2022).

... if this crisis lasts long and the situation lasts long, this welcome that we are seeing in many countries may not last." – Dr. Idrees Ahmad, University of Stirling

What I saw from my research on international humanitarian development aid organizations is that they're quite good in offering this immediate urgent aid ... mobile clinics to give out food, hygiene items, to build temporary module houses, to house people temporarily, but when it comes to more long-term planning of course these international humanitarian aid organizations are not political actors and they're limited in their ability to think more strategically and plan more long term. – Dr. Anastasia Riabchuk, National University of Kyiv-Mohyla Academy

Participants recognized that much uncertainty remains about what the war in Ukraine means for trafficking and exploitation, and how these risks may evolve. While understanding the nuance and specificities of this particular war clearly matters, it was suggested that evidence from other conflicts and/or about systemic drivers of exploitation in the UK could usefully inform responses already. Both prevention and early intervention were seen as important, as illustrated in the quotes below.

... in any disaster preparedness response, we need to think about the long-term implications. Refugee situations don't tend to be always a crisis situation and acute, they do tend to become protracted over time and if we don't respond correctly, there will become difficulties and issues and problems. So, the early intervention and early responses are really crucial. – Academic

We know that traffickers will target vulnerable groups, particularly in times of crisis, but we also know that in times of conflict the lack of income, the lack of access to healthcare, to education, the breakdown of the rule of law, securing access to basic needs such as food and water, can mean that not only have we got predatory traffickers, we've got a hugely vulnerable population, so prevention measures and support and protection are absolutely key. – Dame Sara Thornton, Independent Anti-Slavery Commissioner

There was a clear perception that the UK authorities were not taking sufficient action to address risks of trafficking and exploitation of people fleeing Ukraine. Several mentions were made, in contrast, of cross-sector work among anti-trafficking and related NGOs to try to ensure a more "joined up" and strategic response to Ukraine (although limits to humanitarian responses were also flagged elsewhere). Overall, thinking ahead and acting strategically were seen as vital in mitigating risks, building resilience and ensuring solid provisions should problems arise.

... what are the long-term safeguarding measures, what's going to be the inspection, the oversight? There's no formalized process for safeguarding. – NGO

... frankly, I would say most local authorities at the moment feel in crisis management mode and so that longer term planning of integration needs I'm not sure is happening ... the thought process about education, healthcare, employment, etc. – Academic

Integration²¹ was a recurrent theme in the roundtable discussions, framed as both an important goal in itself and a way of reducing risks of trafficking and exploitation. Four main points arose. The first importance of secure immigration status and ready access to the labor market, education, healthcare and

²¹In the context of immigration, the term "integration" is contested and can have negative overtones (see, e.g., Yeo, 2022). Here, however, it seemed to be used in a sympathetic or largely neutral manner only, simply to convey the idea of helping people settle and access what they needed.

other core services, including accreditation of overseas qualifications. This more holistic approach to addressing trafficking and exploitation recalls Kumar et al.'s (2022, p. 4) call to public health professionals responding to Ukraine to “look beyond immediate health challenges and work holistically, to improve social determinants of health, such as access to financial aid, safe housing, employment and schooling.” The second point was need to engage existing community groups and organizations to support those fleeing the war. The third point that arose included involving Ukrainians, and other migrant-led groups, in strategic planning and service delivery (e.g., on helplines or community support initiatives) so as better to reach those in need and ensure nuance and cultural sensitivity (similar recommendations were made by Kumar et al., 2022). Finally, the fourth point related directly to questions of health: the impacts of trauma were widely mentioned, and several participants called for a trauma-informed approach to give people maximum security, reduce fear and helplessness, and ensure access to psychological and other support services as needed (see also, Stark et al., 2022). It was suggested that refugee camps (used thus far in Ukraine, but not proposed in the UK to date) were best avoided as “this type of ‘total institution’ . . . keeps people really dependent on international humanitarian aid for extended periods of time and they are not integrated into societies” (Dr Riabchuk, National University of Kyiv-Mohyla Academy). In this respect, community hosting of the type pursued under *Homes for Ukraine* could have obvious advantages – if done safely and well. Although not explicitly raised on the day, participants’ focus on integration, forward planning and the protective importance of regular immigration status naturally begs questions around the current lack of legal pathways to settlement for Ukrainians who need or wish to stay in the UK longer than the three years currently permitted. In a similar vein, once the war ends and/or applications to the current visa schemes close, there may be additional challenges in terms of limited options open to people currently involved in the war effort in Ukraine who may wish to reunite with family members already in the UK.

Discussion

There are growing concerns about the potential for widespread trafficking and exploitation linked to the ongoing war in Ukraine. Given the recency of the conflict, however, there is understandably little evidence to corroborate those calls – let alone provide the details and nuance necessary to inform targeted and tailored interventions that minimize harms. Our roundtable-based study demonstrated widespread agreement among experts that the risks of trafficking and exploitation are real, and their contributions offered insights into the mechanisms by which various factors might create and compound risks. In terms of the overarching implications of our study, some key points merit particular emphasis here. New risks specific to the war in Ukraine appear very likely to interact with and amplify existing risks in destination countries – in our case, in the UK. Yet, questions of risk – and, relatedly, of resilience – are nuanced. The issues at stake extend far beyond sexual exploitation alone and are not limited to premeditated and highly-organized offending (see also, ICMPD, 2015; Muraszkiwicz et al., 2020a): indeed, much of the focus in the roundtable discussions was on more opportunistic abuses and exploitation arising from the gradual erosion of standards in situations of acute power imbalances, most notably refugees and their civilian hosts. The limits to an ‘organized crime’ model of trafficking are clearly confronted here, as has been the case in other research in both conflict and non-conflict settings (e.g., Broad & Gadd, [Forthcoming](#); Healy, 2016).

There are also real dangers in lumping together ‘women and children’ as the presumed target for exploitation and not considering important heterogeneities among those fleeing Ukraine. Risk, we would argue, is dynamic, context-specific and best understood as an interaction between personal, situational and structural factors. On the personal side, an intersectional lens matters: without deprioritizing concerns around gender-based violence, it is vital also to consider factors such as age, disability, how people are racialized, and differential immigration status and so forth, which can together affect the options available and associated risks. Our results indicate that complex questions of agency and constrained choices need to be considered carefully and with nuance (see also, Healy, 2016; Kidd, 2020), focusing on ways of improving people’s options, building rights and providing support, which

certainly has implications for preventing trafficking and exploitation but also extend far beyond that goal. Such a perspective resonates clearly with calls to move beyond anti-trafficking's traditional "politics of rescue" toward one of solidarity and rights-building instead (McGrath & Watson, 2018, p. 25). As our findings show, crisis responses to those fleeing Ukraine cannot be separated from the broader context around refuge, asylum and migration; closer inspection here showed clear cracks in the UK's superficially supportive response to refugees fleeing Ukraine. More generally, there is a well-recognized and fundamental tension between states' anti-trafficking efforts and their immigration control agendas at large, in the support of which, activity badged as anti-trafficking but ultimately harmful to precarious migrants can readily be deployed (Anderson & Andrijasevic, 2008; Gadd & Broad, 2018; Smith & Mac, 2018).

It is clearly challenging to develop and implement at speed responses to risks of trafficking and exploitation in the context of a major conflict, and to do so in a way that takes into account the complexities detailed above. These challenges were widely acknowledged by roundtable participants. Such difficulties notwithstanding, the UK's response to those fleeing Ukraine clearly came across as clunky, inadequate, and short-termist. Our results also indicated inconsistencies and disparities within responses in the UK, in terms of regional and local variations, differential treatment across the three Ukraine-specific visas, and apparent disconnects between policy and practice. Crucially, perceived deficiencies in the UK's response to those displaced from Ukraine were seen as likely to increase risks of trafficking and exploitation *en route* to and in the UK, albeit inadvertently. Yet, many such risks that are both foreseeable and, in some cases, were foreseen: e.g., NGOs have long raised concerns with the UK Government about insufficient safeguards in the *Homes for Ukraine* scheme, with apparently little impact (Townsend, 2022b). Our results thus underline the importance of considering both the risks of trafficking and exploitation within other policy decisions (e.g., around the visa schemes) and the potential for harmful effects from interventions explicitly designed to address trafficking. An obvious example of the latter could include blunt policing of sex work suspected to involve Ukrainians that might be framed as anti-trafficking rescue operations but could well be experienced by those affected as violent, intrusive and humiliating brothel raids, particularly if immigration enforcement are also involved (see, e.g., Smith & Mac, 2018). Similarly, although online monitoring for risks of sexual and labor exploitation has been recommended in the context of the war in Ukraine (Hoff & de Volder, 2022), so-called 'indicators' of trafficking themselves contain various biases and are of questionable (and contested) efficacy in sifting large volumes of information online (see, e.g., Kjellgren, 2022; Volodko et al., 2019; De Vries & Cockbain, 2023). Overall, it is not easy to police trafficking and exploitation, but such tensions and the potential for backfire effects need to be surfaced and carefully considered.

Implications for Policy and Practice

While our research addressed the UK context in particular, there are important lessons here for other 'receiving' countries as well in thinking about ways to recognize, mitigate and monitor risks of trafficking and exploitation both *en route* and after arrival. Based on our findings, policy measures are urgently required to address the mechanisms seen to produce risks and impede access to justice among those fleeing Ukraine. Our policy recommendations group broadly around the following six imperatives: 1) preventing people fleeing the war in Ukraine from being left with irregular migration status; 2) improving safeguarding and risk management for those believed to be at particularly high risk of trafficking and exploitation; 3) using information more strategically to address risks and facilitate access to support as needed; 4) building resilience and reducing risk through access to core services, rights and support; 5) tackling existing systemic issues that produce and exacerbate risks of trafficking and exploitation; and 6) working toward a more strategic, longer-term response to trafficking and exploitation related to conflict situations. While the specific policy recommendations we made (see, Cockbain & Sidebottom, 2022) are unlikely to translate directly to other contexts and jurisdictions, the principle behind identifying mechanisms producing risk

and taking targeted steps to address them has a far broader application. As such, similar approaches in other geographical contexts could prove valuable.²² Overall, it is also abundantly clear that there are currently major evidence gaps around risks of trafficking and exploitation related to the war in Ukraine. Those responding in this space face the challenge of treading a careful line between taking these risks seriously, and not overstating them or failing to consider other competing concerns and constraints. Alongside learning from the limited available evidence at present, there is a clear need to develop the knowledge base further, monitoring these issues, and gathering evidence on how the situation develops, both during and after this war.

Limitations and Reflexivity

Earlier in this article we highlighted the challenges in and scarcity of research into trafficking during periods of conflict. In light of these issues, and in an effort to inform and improve future research, we felt it important to critically reflect on the research methodology used here, and acknowledge key limitations. The described roundtable format provided a rich source of insights into a time-sensitive and rapidly-evolving topic: the transcripts alone numbered 63 pages (32,999 words). The event was organized in only three weeks (albeit with intense work from all those involved). We felt it worked well to combine short talks from invited speakers with direct experience of and insights into problems on the ground in or in relation to Ukraine with broader breakout room discussions where an even broader variety of perspectives could be heard. The two-hour event proved productive, but there are of course also limits to the depth of discussions possible in such a short period.

When using a roundtable method for rapid evidence collection (or reading research such as ours), it is vital to be sensitive to the implications of who is invited and what they are steered toward addressing. In this sense, our professional backgrounds undoubtedly influenced how we approached this research, e.g., the decision to ask not just about risks and recommendations, but also words of warning. In determining potential participants, we deliberately sought to include people with a focus on broader overlapping issues like migration, refugees' rights and workers' rights (i.e., not just those who focus specifically on human trafficking or 'modern slavery'), and we also invited some 'critical modern slavery' researchers. Anti-trafficking has often been criticized for taking a narrow criminal justice lens, and we suspect that our recruitment strategy helped explain why the roundtable discussions were actually far broader, with structural factors considered extensively.

Implications for Further Research

From a methodological perspective, our paper demonstrates the value in using a consultative roundtable-based method as a means of gathering evidence on emergent and/or time-sensitive issues. If well-executed, and providing that the limitations are appropriately acknowledged, we believe this relatively underdeveloped method has considerable promise for initial exploratory research with an applied focus. As demonstrated here, the roundtable method enabled us to draw rapidly on extensive individual and organizational experience and expertise, bring together different people's reflections on complex and contested issues, and identify commonalities and divergences across perspectives and (otherwise largely anecdotal) contributions in a rigorous and transparent manner. While roundtable-based approaches are clearly no replacement for slower-time research using more established methods and data, they can certainly be a valuable way of complementing and informing such work.

From a thematic perspective, there is a clear need for further research into the implications of the war in Ukraine for trafficking and exploitation. Thus far, the limited research (ours included) has

²²We recognize that there are of course major challenges in doing such research within active conflict situations (Ford et al., 2009), such as in Ukraine, or indeed in an increasingly hostile Russia: where there are an estimated 1.5 million Ukrainian refugees (UNHCR, 2022a), often reported to have been taken there against their will, and sharp concerns about potential trafficking and exploitation (e.g., Blitz & Lewis, 2022).

tended to focus on the risks and has often been limited to certain geographical settings. As such, there are numerous directions in which the evidence base could be usefully developed. Both qualitative and quantitative methods have much to offer in helping understand, for example, the scale, nature and distribution of actual trafficking and exploitation that transpires, the lived experiences of people displaced by this war, the impact of different policy decisions (e.g., requiring visas versus open border policies), and comparisons to other conflict situations. Rigorous evaluations of anti-trafficking interventions are also vital here, and in short supply in the field in general (Cockbain et al., 2018; Zhang, 2022). Amid calls for more funding for anti-trafficking work in response to the war in Ukraine (e.g., Hoff & de Volder, 2022), transparency and accountability around its impacts is crucial. Overall, it will be important in developing a rigorous evidence-base to remain sensitive to the evolving political and social landscape, and to center the needs and priorities of those displaced by the war in Ukraine.

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Both authors were responsible for the design and conduct of this research, data analysis, drafting and editing this paper. EC led on writing, with contributions and support from AS.

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Data availability statement

Due to confidentiality assurances, the transcripts are not available for onward use.

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Appendix 1: List of invited speakers and participating organizations

Invited speakers

- Dame Sara Thornton DBE QPM, the UK’s Independent Anti-Slavery Commissioner.
- Dr Claire Healy, UNODC Research Officer. Coordinates the UNODC Observatory on Smuggling of Migrants and conducts research on trafficking in persons and smuggling of migrants.
- Dr Anastasiya Ryabchuk, Associate Professor in Sociology at the National University of Kiev-Mohyla Academy. Researcher focusing on labor and the labor movement, poverty and marginality in post-Soviet contexts, and the specific vulnerabilities of frontline communities in the Donbas region of Ukraine.
- Jennifer Blair LLM (International Human Rights Law), Barrister at No. 5 Chambers, Co-Founder of the Ukraine Advice Project, which offers free legal advice to those fleeing the war, and legal consultant to Ukraine Advice Scotland (which is run by JustRight Scotland).
- Dr Olivia Vicol, Director of the Work Rights Center: a charity that supports migrants to access employment rights and improve their social mobility in the UK. A trained anthropologist, who specializes in migrant workers’ experiences of injustice.
- Dr Idrees Ahmad, Lecturer and journalist at the University of Stirling. Specializes in conflict and migration and has written extensively on these topics.
- Elvira Mruchowska, Director of Ukrainian Anti-Trafficking NGO Suchasnyk Plus. Ukrainian anti-trafficking specialist with over twenty years practical experience in the field. Currently working in Canada on the resettlement programme of the Ukrainian Canadian Congress (UCC).
- Dr Laura Wood, medical professional and researcher at the Helen Bamber Foundation and VITA. Pediatric doctor with a special interest in child and family modern slavery.
- Tetiana Rudenko, Senior Co-ordination Adviser at the OSCE Office of the Special Representative and Co-ordinator for Combating Trafficking in Human Beings. Leads the Office’s efforts to prevent and combat trafficking in human beings in relation to Ukraine.

Participating organizations

After Exploitation	Office of the Children’s Commissioner for Northern Ireland
Anti-Trafficking Monitoring Group	Office of the Independent Anti-Slavery Commissioner
Association of Labor Providers	Organization for Security and Co-operation in Europe (OSCE), Office of the
Bail for Immigration Detainees	Special Representative and Co-ordinator for Combating Trafficking in
Border Force	Human Beings
British Red Cross	Police Scotland
Civil service, other	Scottish Government
Department for Education	Sheffield Hallam University
Department for Justice, Northern Ireland	SOHTIS (Survivors of Human Trafficking in Scotland)
Doughty Street Chambers	Stronger Together
Economic and Social Research Council	Suchasnyk Plus
Focus on Labor Exploitation (FLEX)	TARA (Trafficking Awareness Raising Alliance)
Furnival Chambers	TISCreport
Gangmasters and Labor Abuse Authority (GLAAA)	Trilateral Research
Helen Bamber Foundation	UCL
Homes for Ukraine	Ukraine Advice Project
Home Office	Ukrainian Institute London
Hope at Home	UK Research and Innovation
Hope For Justice	University of Exeter
Human Trafficking Foundation	University of Gloucestershire
Independents	University of Hull
International Organization for Migration (IOM)	University of Oxford
JustRight Scotland	University of Leicester
Lancaster University	University of Sheffield
Local Government Association	University of Sussex
Love146	University of Stirling
Metropolitan Police Service, Slavic Police	University of Waikato
Association	University of Warsaw
Migration Yorkshire	United Nations Office on Drugs and Crime (UNODC)
Missing People	Unseen
Modern Slavery and Human Rights Policy and	VITA
Evidence Center	Wesley Gryk Solicitors LLP
National Crime Agency	Work Rights Center
National University of Kyiv-Mohyla Academy	
No. 5 Chambers	
National Police Chiefs’ Council Modern Slavery and	
Organized Immigration Crime Unit	
