Report
March 2024

From exploitation risks to mitigations: looking back locally on the implementation of the UK's Ukraine Schemes

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Executive summary

This research project looks back on the implementation of the UK's Ukraine humanitarian visa Schemes, with a focus on issues encountered around exploitation of displaced Ukrainians. It is based on research interviews conducted roughly seven to nine months on from the launch of the UK's first *Ukraine Scheme (Homes for Ukraine)*. This project builds upon a rapid assessment of human trafficking and exploitation risks and response needs in the UK linked to the war in Ukraine, in which major concerns were raised shortly after Russia's full-scale invasion began[1].

This report summarises learning about Local Authorities' responses to supporting displaced Ukrainians in the UK and how they were managing risks of trafficking and other exploitation across the various *Ukraine Schemes*. It is based on 26 interviews, conducted between October and December 2022 with representatives from Local Authorities (*n*=11), Strategic Migration Partnerships (*n*=3) and civil society organisations (*n*=12). We identified four main themes in terms of issues already encountered and factors widely seen to increase the risks of trafficking and exploitation among displaced Ukrainians in the UK. These are detailed below. Close attention should be paid to how the situation develops, and steps taken to mitigate these risks.

The Westminster Government's response to Ukrainian refugees contrasts sharply with its increasingly punitive approach to refugees and asylum seekers at large – although the Ukraine Schemes themselves have been suddenly and dramatically restricted as of February 2024. As our research shows, the protective functions of allowing people safe passage, the unrestricted right to work and access to public funds should not be underestimated. It is similarly vital to recognise the importance of being able to seek help if exploitation occurs, without fear of immigration detention and removal. From the perspective of attempts to prevent and respond more effectively to trafficking and exploitation, there are important lessons here for many other groups too.

Housing insecurity as a source of multiple dependencies

The most prominent theme was housing insecurity, widely seen as a source of multiple points of dependency that could push people into exploitative situations and/or make it harder to escape them. Challenges identified here were directly tied to broader issues in the UK housing market, including limited social housing stock and barriers to accessing private rentals. Concerns were raised about limited security checks on sponsors, a lack of regular follow-ups, disparities in centralised funding and oversight across the different Schemes, and additional insecurity where housing was contingent on labour for sponsors or employers (who could be one and the same). Some concrete examples were highlighted of sponsors apparently exploiting or attempting to exploit guests. Some issues raised here were particular to certain Ukraine Schemes, others more crosscutting in nature. A major concern here was how much worse the situation seemed set to become around homelessness.

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[1] Cockbain, E. and Sidebottom, A. (2022). The war in Ukraine and associated risks of human trafficking and exploitation: Insights from an evidence-gathering roundtable. London: Office of the Independent Anti-Slavery Commissioner.

Challenges around work and labour exploitation

Participants were generally much more concerned about risks of various labour exploitation, as opposed to other forms of trafficking and exploitation (eg. related to sexual violence). Compared to most people seeking sanctuary in the UK, Ukrainians on the Schemes were described as unusually well-positioned due to their access to the regular labour market and having recourse to public funds, as well as generally having a route for dependents to join them in the UK. Those were characterised as crucial protective factors against labour exploitation risks. Nevertheless, participants raised concerns that in practice the options to access 'decent work' could be limited. Concerns raised here included a lack of support finding work, transferring qualifications, understanding labour rights in the UK, childcare issues, and being in accommodation contingent on certain work. Participants highlighted particular issues within the agricultural sector, including some worrying apparent misuse of the Homes for Ukraine Scheme as a means of securing cheap labour and concerns that insufficient measures were taken to inform eligible Ukrainians already in the UK on the agricultural Seasonal Worker Visa (with restricted work options and no recourse to public funds) of their rights to transfer to the far more generous Ukraine Extension Scheme.

Immigration insecurity and limits to access to specialist immigration advice

Immigration insecurity and limited state-supported access to specialist immigration legal advice was seen to increase exploitation risks by leaving more people unaware of their options and more dependent on hosts and employers. In addition, concerns were raised about those also fleeing Ukraine but excluded from the *Ukraine Schemes*. Groups flagged as having particular immigration insecurity included those already undocumented in the UK prior to the eligibility start dates for the *Ukraine Schemes* and those entering the UK via the Irish land border. Participants also pointed to inherent immigration insecurity faced by all in not knowing what their options would be after the three-year permission to stay expired and the lack of pathways to settlement. Concerns were raised about broader swathes of people potentially becoming far more precarious and vulnerable to exploitation in future, should their status become irregular. The recent announcements of some potential to extend visas by 18 months does little to deliver the longer-term security seen as vital here, particularly in the context of the February 2024 announcement that the *Ukraine Family Scheme* would be closed without notice.

Challenges in identifying and acting on potential trafficking or exploitation

Some participants focussed primarily on perceived risks of exploitation, whereas others spoke of concrete cases they had encountered. The latter covered different points on the continuum of exploitation, but primarily involved more routinised, everyday exploitation that was nevertheless harmful. Some participants expressed frustration at limited responses from the authorities thus far to assist people in exploitative situations that fell short of the threshold to be considered human trafficking or 'modern slavery'. They raised concerns that those unable to address or leave such situations might face ongoing or worsening exploitation, and criticised the onus being put on individuals to enforce their labour rights. Caution was also raised about the low likelihood of Local Authorities identifying trafficking and exploitation, linked to factors including limited interactions with displaced Ukrainians, people not necessarily self-identifying as exploited, and not knowing or trusting they could seek help this way. Only a few Local Authority participants reported having identified potential exploitation of displaced Ukrainians and tried to escalate it to the Westminster Government. Their experiences were mixed, with some reporting frustrations due to communication issues and apparent inaction. This report is based on a qualitative study into a complex topic. While our results give cause for concern,

we make no claims as to generalisability. The landscape is rapidly evolving and further investigation is needed. It is particularly important to understand how risks and harms are experienced by displaced Ukrainians with the least resources, and what they think might help.

Recommendations

The evidence from these interviews has led to the formulation of twelve core recommendations to the Westminster Government (particularly the Home Office). These are designed to address risks of ongoing or escalating exploitation in the UK that relate to the war in Ukraine. While the recommendations arise from project-specific findings, some of them would likely also have broader benefits for other marginalised groups as well. There are also important lessons to be learned for future crisis responses.

Reduce immigration insecurity and facilitate access to specialist immigration advice

1. Create an accessible, fast regularisation route for all Ukrainian nationals who are in the UK irregularly but not currently eligible for the *Ukraine Extension Scheme*. That should come together with free information and specialist support for applications.

2. Ensure there is sufficient flexibility in the *Ukraine Schemes* to allow for non-Ukrainian nationals displaced by the conflict to regularise their status in the UK via the same Schemes.

3. Extending the closing date of the *Ukraine Extension Scheme* beyond 16 May 2024, particularly since Ukrainians are still coming to the UK on *Seasonal Worker Visas*.

4. Require all Seasonal Worker Scheme Operators to inform all Ukrainians on this visa in a timely fashion of their right to switch to the *Ukraine Extension Scheme* and ensure workers who switch onto the *Ukraine Extension Scheme* are not included in the Home Office requirement that 97 per cent of sponsored workers leave the UK at the end of their stay.

5. Bring the *Ukraine Schemes* into scope for legal aid and proactively fund specialised immigration advice and support.

6. Establish a route to settlement for people on the *Ukraine Schemes* to provide security and stability.

7. Fund research into whether and how the provisions within the *Ukraine Extension Scheme* have helped prevent or mitigate exploitation, including trafficking, of Ukrainian nationals.

8. Fund further research on what is needed to ensure the *Ukraine Schemes* are sustainable, safe and can be replicated in the future for refugees from other conflicts.

Facilitate reporting and improved responses around situations of trafficking and exploitation identified among displaced Ukrainians in the UK

1. Implement secure reporting pathways so concerns around trafficking and exploitation (or other abuses) can be reported to the police without a complainant or witness fearing that their personal data will be shared with Immigration Enforcement.

2. Increase resourcing for proactive Labour Market Enforcement, with regular monitoring and inspections, targeted at high-risk workplaces. In doing so, however, it is vital that Labour Market Enforcement does not involve Immigration Enforcement, either in joint visits or onward data sharing about workers' status (see point 1).

3. Implement measures to make it easier for all workers to identify and report breaches of their labour rights and facilitate recourse to justice (*eg.*, through a Single Enforcement Body (SEB) for labour market non-compliance).

4. Provide further training to Local Authorities on the UK's National Referral Mechanism and individual advocacy needed to support a referral and help people who have been exploited access rights and entitlements, such as access to advice and compensation.

Introduction

Since Russia's full-scale invasion of Ukraine on 24th February 2022 nearly 6.5 million refugees from Ukraine have been recorded globally[2]. Estimating the scale of displacement is notoriously challenging. There have been nearly 29 million cross-border movements recorded from Ukraine since 24th February 2022[3], most commonly to Poland (over 17.2 million), Russia (over 2.8 million, although forced displacement to Russia remains a major concern[4]), Hungary (over 4.2 million), Romania (over 3.9 million), and Slovakia (over 2 million). Within Europe, Ukrainian refugees have applied for Asylum, Temporary Protection or similar national protection Schemes in the greatest numbers in Poland (over 1.6 million), Germany (over 1.1 million), and the Czech Republic (nearly 600,000)[5]. Two years on from the full-scale invasion, there have been 200,600 arrivals of Ukraine humanitarian visa holders to the UK (plus 31,500 in country extensions)[6]. While lower than in many other European countries, the numbers of Ukrainians coming to the UK have been 'far larger in scale than any other single forced migration flow to the UK in recent history'[7]. For example, there were roughly the same number of Ukrainian arrivals in 2022 alone as the total number of people previously granted refuge in the UK from *all* countries over the entire period 2014-2021[8].

In the early days of the 2022 invasion, the European Union (EU) swiftly implemented the Temporary Protection Directive to allow Ukrainian refugees visa-free travel and the right to work in all its member states[9]. In contrast, the UK Government moved more slowly but then created a series of new *Ukraine Schemes* (Ukraine-specific visa Schemes), in response to an outpouring of public support and criticisms that the initial provisions offered were too narrow[10]. Both the EU and the UK have nevertheless attracted criticism for not extending similar levels of support to non-Ukrainians fleeing the same war, for example Ukraine's large overseas student population[11].

The UK's *Ukraine Schemes* were established and are operated separately to the UK's asylum system: under the Department for Levelling Up, Homes and Communities (DLUHC) rather than the Home Office. Visas are issued by UKVI (UK Visas and Immigration) within the Home Office, and Local Authorities are responsible for arrivals, including education, health and housing provisions (rather than the Asylum

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[2] UNHCR. (2023). Operational Data Portal. Ukrainian Refugee Situation. Last updated 15 February 2024.

[3] Ibid.

[4] International Criminal Court. (17 March 2023). Situation in Ukraine: ICC judges issue arrest warrants against Vladimir Vladimirovich Putin and Maria Alekseyevna Lvova-Belova. Last accessed 13 March 2024; The Migration Observatory. (24 August 2022). Q&A: The UK and the Ukraine refugee situation. Last accessed 13 March 2024; Borger, J. (17 March 2023). ICC judges issue arrest warrant for Vladimir Putin over alleged war crimes. The Guardian. Last accessed 13 March 2024.

[5] UNHCR. (2023). Operational Data Portal. Ukrainian Refugee Situation. Last updated 15 February 2024.

[6] UK Government. (2024). Ukraine Family Scheme, Ukraine Sponsorship Scheme (Homes for Ukraine) and Ukraine Extension Scheme Visa Data. Last updated 20 February 2024.

[7] House of Commons Library. (05 December 2022). Research Briefing. Asylum statistics. UK Parliament. Last accessed 13 March 2024.

[8] Ibid.

[9] European Commission. (3 March 2022). EU invokes Temporary Protection Directive to help those fleeing Ukraine. Last accessed 13 March 2024.

[10] Cockbain, E. and Sidebottom, A. (2022). ˜War, Displacement, and Human Trafficking and Exploitation: Findings from an evidence-gathering Roundtable in Response to the War in Ukraine˜. Journal of Human Trafficking; Vicol, O. and Sehic, A. (January 2023). 'On the frontline. London councils' responses to the humanitarian crisis in Ukraine. Work Rights Centre. Last accessed 13 March 2024.

[11] HIAS. (26 January 2023). "They told me they couldn't help me…" Protection Risks Facing Non-Ukrainian Asylum Seekers and Refugees Fleeing Ukraine to the EU. Last accessed 13 March 2024; Cockbain, E. and Sidebottom, A. (2022). The war in Ukraine and associated risks of human trafficking and exploitation: Insights from an evidence-gathering roundtable. London: Office of the Independent Anti-Slavery Commissioner.

Support system being used). Arrivals of Ukrainians in the UK peaked March-May 2022 (depending on Scheme), then began to fall and have (mostly) been relatively stable at much lower levels since[12].

There have been three visa-based routes specifically for Ukrainians (and the immediate family members of applicants). Table 1 below provides a brief overview of these visa Schemes, eligibility and uptake to date[13]. The Schemes have all undergone various changes since their inception, so the table reflects the latest conditions (correct as of 28 February 2024)[14]. Importantly, a disparity can be observed between visas issued and actual arrivals in the UK. All three *Ukraine Schemes* include the 'right to work' and recourse to public funds. None carry visa charges or a requirement to pay immigration health surcharges. None have routes to settlement, however.

According to the Home Office as of June 2023, nearly half of people who have arrived in the UK on the *Ukraine Schemes* are women aged 18-64 years (48%), 28% are children (under 18s) and just 19% men aged 18-64[15]. The gender disparity is unsurprising, given that martial law in Ukraine means most adult men are not allowed to leave the country. Relatively few Ukrainians have made asylum applications in the UK[16].

On 19 February 2024, the Westminster Government abruptly ended one of its flagship *Ukraine Schemes (the Ukraine Family Scheme)* and limited access to the *Homes for Ukraine Scheme* to people with a British, Irish or settled sponsor[17]. Previously, sponsors only needed to have six months leave, which had allowed people to sponsor family if they had adequate housing and a visa under the *Ukraine Schemes*. At the same time, the UK shortened new permissions to stay under the *Homes for Ukraine Scheme* to 18 months (from 36 months)[18]. The Westminster Government also announced that people on the three *Ukraine Schemes* 'may be able to apply for a further 18-months permission to stay under the new *Ukraine Permission Extension Scheme* three months before existing visas are due to expire[19]. The details are not yet clear and the move has been criticised for failing to address immigration insecurity adequately or provide pathways to settlement[20]. The *Ukraine Extension Scheme* is also due to end in May 2024 (except for certain children born in the UK). Together, the changes detailed in this section represent a sharp curtailment of provisions for displaced Ukrainians. Likely implemented at least in part to reduce migration numbers, experts have warned that they are likely to have dire consequences in terms of family separation and increased risk of homelessness[21].

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[12] Home Office. (2023). Statistics on Ukrainians in the UK. Last updated 14 November 2023.

[13] Sources for the table include: UK Government. (2024). Ukraine Family Scheme, Ukraine Sponsorship Scheme (Homes for Ukraine) and Ukraine Extension Scheme visa data. Last updated 20 February 2024; UK Government. (16 January 2023). Funding for councils: Homes for Ukraine. Last accessed 13 March 2024; Ukraine Sponsorship Scheme: Visa data by country, upper and lower tier local authority. Last updated on the 22 February 2024; Northern Ireland Direct (no date). Information for Ukrainians arriving in Northern Ireland. Last accessed 13 March 2024; Focus on Labour Exploitation (FLEX) and Fife Migrants Forum. (2021). Assessment of the risks of human trafficking for forced labour on the UK Seasonal Workers Pilot. London; Home Office. (2022). National statistics: Why do people come to the UK? To work. Last accessed 13 March 2024.

[14] UK Government. (2024). Ukraine Family Scheme, Ukraine Sponsorship Scheme (Homes for Ukraine) and Ukraine Extension Scheme visa data. Transparency data. Last updated 20 February 2024.

[15] Home Office. (2023). Statistics on Ukrainians in the UK. Last updated 14 November 2023.

[16] Ibid. For example, in the year to end June 2023 there were just 115 asylum applications (relating to 266 people). The numbers were higher earlier in the full-scale war, however, with 458 applications between 24 February 2022 and 3 May 2022 (when the Ukraine Extension Scheme was launched).

[17] Electronic Immigration Network. (19 February 2024). New statement of changes to Immigration Rules makes changes to Ukraine Schemes and care worker visas. Last accessed 13 March 2024.

[18] UK Government. (no date). Homes for Ukraine: record your interest. Last accessed 13 March 2024.

[19] UK Government. (2024). UK Visa Support for Ukrainian Nationals. Last updated 19 February 2024.

[20] See, eg., Heath, M. (27 February 2024). Northampton woman calls for UK settled status for Ukrainians. BBC. Last accessed 13 March 2024; Harley, N. (23 February 2024). Ukraine refugees fear they will never return to their homeland. The National. Last accessed 13 March 2024.

[21] Electronic Immigration Network. (2024). New statement of changes to Immigration Rules makes changes to Ukraine Schemes and care worker visas. Last updated 19 February 2024.

Table 1: Ukraine Schemes (correct as of 22 February 2024)

Visa route	Number of arrivals to date	Visas issued/ permissions extended	Summary of eligibility and procedure
'Homes for Ukraine' (Ukraine Sponsorship Scheme)	143,700	180,600	Open to Ukrainians (and certain immediate family members) to apply for a visa linked to a specific host, who commits to providing at least six months accommodation and meets the requirements for sponsoring and hosting. Originally, visas gave three years permission to stay. From 19 Feb 2024 new visas are for 18 months only. Another significant change from 19 Feb 2024 is that sponsors must now be British, Irish or settled. Previously sponsors only needed to have six months leave to remain, which had allowed displaced Ukrainians themselves to sponsor family or other compatriots if they had adequate housing and a visa under the Ukraine Schemes. Arrivals are entitled to a one-off £200 support payment and hosts receive 'thank you' payments from the authorities, initially set at £350/month (regardless of number of guests). The eligibility payment was later extended and payments are now £500/month if guests have been in the UK over 12 months (£350/month otherwise). Local councils originally received a £10,500 'tariff' payment per arrival in their area, reduced to £5,900 from 1st Jan 2023 (exceptions for eligible minors). While people applying for this Scheme for England and Northern Ireland always had to name a designated sponsor, in Scotland and Wales they could also choose just to name the national government instead who acted as a 'super sponsor'. The *Scottish Super Sponsor Scheme* has been paused for new applications since 13 July 2022 and the *Welsh Scheme* was indefinitely suspended on 10 June 2022.
Ukraine Family Scheme	56,900	72,000	Instigated as a route to family reunification, this Scheme was open to Ukrainians (and certain immediate relatives) sponsored by family members in the UK with certain migration statuses (*eg.*, British citizens, EU nationals with settled or pre-settled status, people with indefinite leave to remain etc.). As with *Homes for Ukraine, Ukraine Family Scheme* visa-holders had permission to stay in the UK for up to three years. In most parts of the UK, this Scheme had no funding attached in terms of support payments for Local Authorities, hosts, or individual arrivals. In Northern Ireland, however, arrivals on the *Ukraine Family Scheme* were entitled to a one-off £200 welcome payment. This Scheme was abruptly ended on 19 February 2024.

| Ukraine Extension Scheme | (Not applicable) | 23,400 | Open to eligible Ukrainians already in the UK (and certain immediate family members). It does not involve visa sponsors. It was implemented following public pressure from NGOs and others concerned about Ukrainians already in the UK falling through the gaps in provisions, including on those on six-month tied *Seasonal Worker Visas* (Ukrainians had made up a large proportion of these visa holders in the previous years). It is currently open to those who previously had permission to be in the UK and that permission expired on or after 1 January 2022 or who had permission to be in the UK on or between 18 March 2022 and 16 November 2023. This Scheme does not have funding attached to support Local Authorities or visa-holders (except in Northern Ireland, where individuals are entitled to a one-off payment of £200, in line with the other Schemes). This Scheme is due to end 16 May 2024, except for children born in the UK to qualifying parents. |

Immigration policy is not a devolved power in the UK. Thus, the central UK Government processes applications and issues the visas under all three *Ukraine Schemes*. Yet, much of the responsibility for supporting people arriving, or staying, in the UK under these Schemes falls to local government. The situation is fast evolving and there is – unsurprisingly – still relatively little in-depth research into the experiences of and support for Ukrainians in the UK[22]. According to research thus far[23], there is considerable variation in local government responses to supporting displaced Ukrainians, leading to something of a postcode lottery. The UK system of governance is complex, with a central (Westminster) government, three other national governments, and then local government, the structure of which varies by area and nation. England has 317 different Local Authorities, Wales 22, Scotland 32 and Northern Ireland 11 (called Local Government Districts). This fragmentation is particularly relevant, given the key role played by local government in responding to displaced Ukrainians and previously documented concerns about the limited guidance and support from the Westminster Government[24]. For concision and because the local government participants in our study were all based in England, we use the term 'Local Authorities' throughout, although we recognise that terms can vary by country.

Although there are undoubtable successes in terms of the numbers of people able to access sanctuary in the UK over a short space of time, there have also been considerable concerns around the *Ukraine Schemes* since they were first introduced. Widely described by various professionals participating in

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[22] Notable exceptions include Vicol, O. and Sehic, A. (January 2023). 'On the frontline. London councils' responses to the humanitarian crisis in Ukraine'. Work Rights Centre. Last accessed 13 March 2024; Broadhead, J. (2022). Building an infrastructure for community led welcome in the UK Learning from the mobilisation of the Homes for Ukraine Scheme. Inclusive Cities; Benson, M., Sigona, N. and Zambelli, E. (2024). Humanitarian Visas in a Hostile Environment, MIGZEN Research Brief.

[23] Vicol, O. and Sehic, A. (January 2023). 'On the frontline. London councils' responses to the humanitarian crisis in Ukraine'. Work Rights Centre. Last accessed 13 March 2024.

[24] Broadhead, J. (2022). Building an infrastructure for community led welcome in the UK Learning from the mobilisation of the Homes for Ukraine Scheme. Inclusive Cities; Vicol, O. and Sehic, A. (January 2023). 'On the frontline. London councils' responses to the humanitarian crisis in Ukraine'. Work Rights Centre. Last accessed 13 March 2024; Cockbain, E. and Sidebottom, A. (2022). The war in Ukraine and associated risks of human trafficking and exploitation: Insights from an evidence-gathering roundtable. London: Office of the Independent Anti-Slavery Commissioner.

prior research as 'fragmented and confusing'[25], the UK Government's approach has also been critiqued as a sign of a troubling shift to a 'new bespokism' in asylum policy[26], bypassing the existing asylum system and detracting from the need for wider systemic reforms. Indeed, while we refer to Ukrainian 'refugees' in this report, only a tiny proportion of arrivals have gone through the asylum system[27]. The *Ukraine Schemes* also contrast sharply with increasingly hostile rhetoric around immigration and the introduction of increasingly hostile measures to curtail access to international refugee protections (such as the Nationality and Borders Act 2023, the Illegal Migration Act 2024 and the attempts to deport asylum-seekers to Rwanda)[28].

From the beginning of Russia's 2022 invasion, there have been considerable concerns both nationally and internationally about risks of human trafficking linked to this war. Prior research shows how conflict and forced displacement can create conditions conducive to such abuses, including in conflict zones themselves and in situations of displacement within and beyond a country's borders[29]. Previous experiences with other humanitarian crises, conflicts and natural disasters (including pandemics) indicated increased risks of human trafficking[30]. A rapid evidence-gathering exercise in April 2022 identified widespread concerns among a range of professionals about risks of trafficking and exploitation[31], for reasons including the particular characteristics of refugees from this conflict (eg., gender, age, disabilities), risks linked to delays in visa-processing, the power dynamics and dependencies created by the *Homes for Ukraine Scheme*, a lack of clear and accessible information, gaps in resourcing and support, and a lack of long-term strategic planning. Contrary to the dominant focus on risks of sexual exploitation, much of the concerns there focused on risks of domestic servitude and various other forms of labour exploitation and encompassed both trafficking or 'modern slavery' (increasingly the dominant term in the UK) and less extreme but more routinised abuses.

There is a growing body of evidence documenting the day-to-day challenges faced by Ukrainians in the UK, other destination and transit countries in Europe[32]. According to (generally small-scale and localised) qualitative research already published in the UK and ongoing media coverage, particular issues include eviction and homelessness, accommodation insecurity in the private rental sector,

[25] Cockbain, E. and Sidebottom, A. (2022). 'War, Displacement, and Human Trafficking and Exploitation: Findings from an evidence-gathering Roundtable in Response to the War in Ukraine'. Journal of Human Trafficking.

[26] Tomlinson, J. (2022). 'Bureaucratic Warfare: Administrative Justice and the Crisis of the 'New Bespokism''. Journal of Immigration, Asylum and Nationality Law.

[27] Home Office. (2023). Statistics on Ukrainians in the UK. Last updated 14 November 2023.

[28] Benson, M., Sigona, N. and Zambelli, E. (2024). Humanitarian Visas in a Hostile Environment, MIGZEN Research Brief; Tomlinson, J. (2022). 'Bureaucratic Warfare: Administrative Justice and the Crisis of the 'New Bespokism''. Journal of Immigration, Asylum and Nationality Law.

[29] GRETA. (17 March 2022). 'States must act urgently to protect refugees fleeing Ukraine from human trafficking', Council of Europe. Last accessed 13 March 2024; Kidd, A. (2020). Unavoidable exploitation? Conflict, agency and human trafficking. Human trafficking in conflict: Context, causes and the military, 43-60. In: Muraszkiewicz, J., Fenton, T., Watson, H. (eds) Human Trafficking in Conflict. Crime Prevention and Security Management. Palgrave Macmillan, Cham, 43-60; UNODC. (2018). 'Trafficking in persons in the context of armed conflict'. Vienna.

[30] UNODC. (2022). Conflict in Ukraine: Key Evidence on Risks of Trafficking in Persons and Smuggling of Migrants. UNODC Research; Kidd, A. (2020). Unavoidable exploitation? Conflict, agency and human trafficking. Human trafficking in conflict: Context, causes and the military, 43-60. In: Muraszkiewicz, J., Fenton, T., Watson, H. (eds) Human Trafficking in Conflict. Crime Prevention and Security Management. Palgrave Macmillan, Cham.; Hilland, A. Biggs M. and Kerr, S. (July 2022). Assessing the case for a Global Commission on Modern Slavery and Human Trafficking. Modern Slavery and Human Rights Policy and Evidence Centre; Worsnop, CZ. (2019). The Disease Outbreak-Human Trafficking Connection: A Missed Opportunity. Health Security;17(3):181–92.

[31] Cockbain, E. and Sidebottom, A. (2022). The war in Ukraine and associated risks of human trafficking and exploitation: Insights from an evidence-gathering roundtable. London: Office of the Independent Anti-Slavery Commissioner.

[32] European Union Agency for Fundamental Rights. (2022). The Russian war of aggression against Ukraine- the broad fundamental rights impact in the EU. Bulletin #2.

unemployment, downward mobility and problems finding secure work[33]. Such conditions could reasonably be expected to render people more vulnerable to various harms, including labour exploitation across the continuum of exploitation[34]. Immigration insecurity linked to these time-limited visas has increasingly been highlighted too: for example, a new study based on in-depth interviews with 20 displaced Ukrainians in the UK documented a 'prevailing sense of temporariness and uncertainty' linked to the time-limited visas, 'leaving them feeling protected but lacking certain rights'[35].

From a quantitative perspective, experimental statistics from the UK Humanitarian Insight Survey echo some of these issues. It found that many Ukrainians in the UK do not intend to return to Ukraine even when safe, with 52% of adult respondents saying they intended to stay in the UK and many others saying they needed more clarity on visa options[36]. Highlighting particular issues around labour market participation, a quarter of adults reported being unemployed and actively seeking work in the UK (26%), compared with just 3% who said that had been their situation in Ukraine. Over half (58%) of adults reported working in a different sector in the UK than in Ukraine, most commonly in hospitality, manufacturing or construction and food production (including agriculture). Although most adult respondents reported being very or fairly satisfied with their accommodation, the rates were notably lower for those on the *Ukraine Family Scheme than Homes for Ukraine* (87% vs. 92%).

Challenges around homelessness have been documented elsewhere, particularly as the war drags on, initial hosting agreements run out, and the cost of living crisis bites. For example, recent research commissioned by the Red Cross concluded that displaced Ukrainians were 4.4 times more likely than the general population to present as homeless or at risk of homelessness after their first year of arrival[37]. That study predicted 6,220 Ukrainian households will have experienced statutory homelessness by the end of the financial year 2023-24 (up 13%), with the majority of those in 'core homelessness': 'which includes more immediate and extreme forms of homelessness, such as staying in emergency hostels, sofa surfing or rough sleeping[38].

Local Authorities carry out the day-to-day implementation of the *Ukraine Schemes*, with the responsibility for housing, education, healthcare, safeguarding and so forth. They also have statutory requirements to report suspected trafficking and other 'modern slavery'. Their vital role in the delivery of support and services for people fleeing Ukraine made Local Authorities a natural focus for this research. Our aim was to explore perspectives and responses around risks of trafficking and exploitation among displaced Ukrainians in the UK at the local level.

To meet this aim, we sought to investigate (1) human trafficking and exploitation issues facing displaced Ukrainians that had already been encountered at local level; (2) the key challenges faced by Local Authorities in addressing these issues; (3) protective measures adopted; and (4) particular

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[33] Benson, M., Sigona, N. and Zambelli, E. (2024). Humanitarian Visas in a Hostile Environment, MIGZEN Research Brief; Vicol, O. and Sehic, A. (January 2023). 'On the frontline. London councils' responses to the humanitarian crisis in Ukraine. Work Rights Centre. Last accessed 13 March 2024; Andy Hewett Consultancy. Ukraine homelessness in England. Last updated 31 January 2024. Only local authorities with homelessness data are shown.

[34] ODIHR- Office for Democratic Institutions and Human Rights. (2023). Survey on the safety and security of women refugees from Ukraine. OSCE; Labour Exploitation Advisory Group. (2024). "So I decided to carry on…": The continuum of exploitation in practice. FLEX.

[35] Benson, M., Sigona, N. and Zambelli, E. (2024). Humanitarian Visas in a Hostile Environment, MIGZEN Research Brief.

[36] Office for National Statistics. (2023). Visa holders entering the UK under the Ukraine Humanitarian Schemes: 27 April to 15 May 2023. Last updated 7 July 2023.

[37] Bramley, G. (2023). Homelessness among displaced Ukrainians in the UK: Summary of research findings. Red Cross and Herriot-Watt University.

[38] Ibid.

risks perceived in the longer-term. In line with earlier research[39] we chose to focus on trafficking and exploitation – rather than just 'modern slavery'– because of our recognition of a 'continuum of exploitation'[40], potential overlap between conditions producing more and less extreme exploitation, the unacceptability of even 'lower level' abuses, and the potential for an escalation in harms.

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[39] Cockbain, E. and Sidebottom, A. (2022). 'War, Displacement, and Human Trafficking and Exploitation: Findings from an evidence-gathering Roundtable in Response to the War in Ukraine'. Journal of Human Trafficking.

[40] Skrivankova, K. (2010). Between decent work and forced labour: Examining the continuum of exploitation. York: Joseph Rowntree Foundation.

Methodology

Due to the topic's complexities and limited foundational research, we took a qualitative approach. We used semi-structured interviews to explore experiences and perspectives around local government responses to risks and/or actual incidents of trafficking and exploitation of displaced Ukrainians in the UK. Using purposive sampling (complemented with some snowball sampling), we approached[41] people working in local government in various roles strategically or operationally related to displaced Ukrainians in the UK, and people or organisations in civil society with a relevant role. Civil society organisations were selected if their work supported displaced Ukrainians in the UK and, generally, they had a relationship with at least one Local Authority. We sought diversity in terms of geographical area (UK-wide, national, regional and local), regions (more rural or urban), and area of work (employment, legal advice, health, safeguarding and housing). Due to time and budgetary constraints, we were not able to speak to displaced Ukrainians directly.

We interviewed a total of 26 people: 11 working in local government, three from Strategic Migration Partnerships[42] and 12 from civil society organisations. The interviews were loosely structured around their own and their organisation's role in response to Ukrainians in the UK, and their interactions with Local Authorities, understanding of trafficking, the perceived risks of trafficking or exploitation, groups they perceived to be particularly vulnerable to such abuses, and measures to address these risks. Interviews were conducted online, between October and December 2022 and lasted between 35 and 55 minutes. Virtually all were done one-on-one (two involved two participants each). Interviews were recorded, then transcribed and analysed thematically[43]. All participants gave informed consent, and we took care throughout to protect anonymity and confidentiality. The study was approved by the UCL Department of Security and Crime Science Ethics Committee prior to data collection[44].

All interviewees had direct (n=21) or indirect (n=5)[45] contact with Ukrainians in the UK through their work. Roles included integration services such as checks for *Homes for Ukraine* sponsors and houses, provision of English classes, safeguarding, legal advice, case work support, resettlement support and anti-trafficking work. Some individuals were relatively new in post, while others had decades of experience working in the area of refugee resettlement or anti-trafficking. There were organisations or people who work on human trafficking and exploitation as a primary role (n=12) and others as a secondary role (n=14)[46]. Our sample skewed towards participants working in England (n=16), with three in Scotland, one in Northern Ireland, one in both Wales and England, and five working UK-wide.

As is common in qualitative research, our aim was not to produce generalisable results, but rather to unpack complex issues in depth. While this report offers insights into an important issue, we also

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[41] We used three main modes of recruitment: emails to existing contacts of FLEX or other civil society organisations who met the inclusion criteria; dissemination of information about the study through newsletters of various organisations; and discussion of the study in different online Local Authority meetings (to which the first author had been invited).

[42] There are 12 Strategic Migration Partnerships across the UK. They are normally funded by central government to provide a strategic coordination role on migration, particularly refugees and people seeking asylum within regions. They have overseen a range of migration programmes.

[43] Clarke and Braun. (2021). Thematic analysis: a practical guide.

[44] The study was reviewed and granted an exemption on the basis of research involving the use of completely anonymous interview procedures, participants are not defined as `vulnerable´, and participation will not induce undue psychological stress or anxiety.

[45] We mean direct support such as social workers, refugee legal advice, employment support worker while indirect such as policy makers, legal advice to organisations, migration mediator.

[46] Primary Trafficking experience was used when the role of the person, department or civil society organisation was primarily anti-trafficking work, while Secondary Trafficking experience was when the main purpose was other than trafficking.

recognise its limitations. Our sample size is relatively small and given the fragmented structure of local government in the UK there is likely considerable local, regional, and national variation in terms of experiences and responses around supporting displaced Ukrainians in the UK. Trafficking and exploitation risks may vary geographically too. There is also likely some self-selection bias, in that people less interested or concerned about trafficking risks were probably less likely to be reached via our networks to learn about the research or agree to participate. Crucially, more research is needed that engages directly with displaced Ukrainians[47]. There were also unavoidable delays to publication, and the situation has likely evolved since then. Nevertheless, the resonance with recent media coverage indicates that many of the themes of concern identified here remain very relevant. Addressing these issues before they worsen is vital, and there are lessons to be learnt for future responses to conflicts too.

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[47] Some such research has already been published, albeit less commonly with a trafficking or exploitation focus. In the UK, see for example, Vicol, O. and Sehic, A. (January 2023). 'On the frontline. London councils' responses to the humanitarian crisis in Ukraine. Work Rights Centre. Last accessed 13 March 2024; Benson, M., Sigona, N. and Zambelli, E (2024) Humanitarian Visas in a Hostile Environment, MIGZEN Research Brief; Outside the UK, see, eg., Pertek, S., Kuznetsova, I. and Kot, M. (2022). "Not a single safe place": The Ukrainian refugees at risk: violence, trafficking and exploitation. Findings from Poland and Ukraine.

Results

Through our analysis[48], we identified four main themes about mechanisms perceived to increase the risks of trafficking and exploitation among Ukrainians in the UK and impede responses: 1) housing insecurity as a source of multiple dependencies; 2) challenges around work and labour exploitation; 3) immigration insecurity and limits to accessing specialist immigration advice and 4) challenges in identifying and acting on situations of potential trafficking and exploitation. Each is now discussed in turn, illustrated throughout with anonymised quotations[49].

1. Housing insecurity as a source of multiple dependencies

Housing insecurity was the biggest focus across the dataset: 'it's what everybody is concerned about at the moment' (Participant 7, Civil society, London). It was widely seen as a source of multiple dependencies for displaced Ukrainians once in the UK. Concerns around housing insecurity were framed by participants against the context of a broader UK-wide housing crisis: very limited social housing stock, barriers to private rentals, and issues regarding access to and appropriateness of emergency housing. Many participants saw housing insecurity and rising risks of homelessness among Ukrainians as key precursors for making those with the least resources vulnerable to new exploitation and less able to leave existing exploitative situations, as illustrated below.

> "Amongst those who are still in exploitative situations...we've identified a kind of lack of information about entitlements and option and fear of repercussions, fear of homelessness in particular, as kind of common barriers to exiting the exploitation."
>
> **Participant 23 (Civil society, UK-wide)**

> "So they can't get access to the private rented housing market because it's too aggressive and too expensive and they can't find meaningful employment. So, it's just leaving them in this state of flux where they're at the mercy of their hosts. And if they're in an exploitative situation that's just going to continue because they don't have any alternative over the homelessness or destitution."
>
> **Participant 3 (Civil society, UK-wide)**

While recognising that displaced Ukrainians vary in their socioeconomic position and available resources, numerous participants raised difficulties in transitioning into private sector rentals, including high rents, a shortage of stock, difficulties renting without a UK credit history or guarantors. While these were not issues seen as unique to displaced Ukrainians, some said some landlords were particularly reluctant to rent to Ukrainians because of uncertainty about how long they would stay in the UK. The focus on housing insecurity and homelessness risks as a major issue facing displaced Ukrainians in the UK very much resonates with prior research[50].

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[48] We used reflexive thematic analysis, see Clarke and Braun. (2021). Thematic analysis: a practical guide. Thematic Analysis.

[49] For the purpose of this report, we have slightly tidied up some quotes to improve readability (eg. deleting 'erm', 'you know' and repetition of words such as 'if we could, if we could' becomes 'if we could').

[50] JustRight Scotland. (September 2022). Reflections on the Ukraine Scheme in Scotland: Feedback from clients of Ukraine Advice Scotland. Last accessed 13 March 2024; Bramley, G. (2023) Homelessness among displaced Ukrainians in the UK: Summary of research findings. Red Cross and Herriot-Watt University; Vicol, O. and Sehic, A. (January 2023). 'On the frontline. London councils' responses to the humanitarian crisis in Ukraine. Work Rights Centre. Last accessed 13 March 2024; Benson, M., Sigona, N. and Zambelli, E. (2024). Humanitarian Visas in a Hostile Environment, MIGZEN Research Brief; Office for National Statistics. (2023). Experiences of Homes for Ukraine Scheme sponsors, UK: 10 to 21 August 2023. Last updated 4 October 2023.

Numerous Local Authorities were said to have taken various steps to assist in addressing housing insecurity, including allocating funds towards deposits, paying part of the first month(s)' rent and cash incentives to landlords. Overall, the provisions appeared highly variable and views were mixed or unsure about what might be most effective (eg. some thought acting as guarantors would solve the issues, whereas others disagreed). Here, various participants stressed the need for better national responses to the housing crisis, as illustrated below.

> "The problem with housing is a national issue for everybody and therefore it requires central government guidance and support with it because no local authority can fix that problem on its own. So, even if we have lots of funding and we can, for example, act as guarantors for people that is not going to fix the issue. There are still going to be lots of people who we can't get into private rented sector because there isn't the stock of houses available."
>
> **Participant 15 (Local Authority, Southwest England)**

> "Housing is a huge crisis for everybody in the UK and it's now become an even bigger crisis for people in the refugee system because of the poorly thought through policies...as always, volunteer sector organizations have done their level best. And I think the Ukrainian diaspora communities in the UK have done a phenomenal job of transforming themselves into welfare and housing support organizations. But you can't magic housing and safe housing for people."
>
> **Participant 6 (Civil society, UK-wide)**

Many participants also spoke to the limits of Local Authorities' ability to ensure hosting placements were safe and suitable. A key measure described as designed to address safeguarding risks (including but not limited to potential trafficking and exploitation) was the pre-arrival checks (*Homes for Ukraine* only). Those included DBS (Disclosure and Barring Service) criminal record checks and accommodation checks (to establish whether accommodation meets minimum standards in terms of gas and electricity safety, is in decent condition, etc). Yet, many stressed that DBS provides only a partial picture of potential risks. Moreover, many participants reported situations where visas were issued before pre-arrival checks on DBS and accommodation were completed, checks were then failed and a new host had to be found at short notice or guests were reluctant to leave. Views were mixed on whether the right balance was being struck: some participants stressed the risks in delaying people's ability to travel to the UK, while others felt there had been too much risk in the current approach. These tensions are illustrated below.

> "That doesn't pick up if there are any child or adult protection flags that are on the system within the local authority...And I do know that they're heard a couple of times from local authorities they said, "well, actually this person had been, they've been flags raised about elder abuse historically"."
>
> **Participant 6 (Civil society, UK-wide)**

> "I think you know when you're facing potentially hundreds of thousands of people in that dangerous situation and you're trying to get as many people to safety as possible, it is trying to find a balance between eliminating every single risk which is, which is just not possible."
>
> **Participant 11 (Strategic Migration Partnership)**

> "And it was a deliberate policy choice. It was like, "Well, this is a crisis situation. We'll get people into accommodation first and we'll work out safety afterwards"...I think that's completely inappropriate and it's dangerous, frankly dangerous. And we know that people have suffered as a result of that."
>
> **Participant 6 (Civil society, UK-wide)**

In addition to the initial checks, participants also reported that Local Authorities conduct their own follow-up checks. A small minority of participants reported having encountered situations relating to sexual violence (risks or attempted), of the type illustrated in the following quotes. It is worth noting that these were extreme cases and raised only very rarely.

> "Mainly around opportunistic sexual exploitation is what we're experiencing, so less of an organised crime element and more of hosts who have agreed to host young, attractive, female Ukrainians for the purposes of exploiting them for sexual gratification. We've heard cases where entire families have been hosted and the host has been making efforts to isolate the young female from the rest of the family. So, locking of doors and suggesting that there's certain parts of the house where they're not allowed to go to."
>
> **Participant 3 (Civil society, UK-wide)**

> "And in one case that has been in the news[51]…involved a couple with a young child who went to live with a sponsor who is on the sex offenders register and it came to light after the family had already arrived and were living at that address."
>
> **Participant 25 (Civil society, Northern Ireland)**

More commonly, various participants stressed a power imbalance in hosting relations and the ways they thought exploitation could gradually develop and people with limited alternatives could feel pressured to put up with difficult situations for want of a viable alternative, as illustrated below. A few participants also pointed to perceived additional risks to guests in rural areas arising from their more isolated situation. These points are illustrated below. While the vast majority of participants focused on risks to guests from hosts, very occasionally a participant also raised risks and instances of harms in the other direction.

> "And the mismatch of power and then thinking about how they need to proactively engage with those relationships and make sure that there are pathways for Ukrainians to be able to connect with statutory or other services to be able to flag any concerns they might have. Because it might be very low-level things before you start to go into things like labour exploitation or sexual abuse."
>
> **Participant 6 (Civil society, UK-wide)**

> "Rural addresses are not themselves the problem, but it can lead to situations that kind of isolation. Which can then result in maybe her putting up with a situation because she doesn't know where to go, who to turn to. So, it can kind of create the conditions where exploitation can occur."
>
> **Participant 25 (Civil society, Northern Ireland)**

Relatedly, many participants pointed to situations they had encountered or heard about that appeared exploitative and to breach the guidance of the *Homes for Ukraine* Scheme but would be unlikely to cross the threshold to be considered trafficking or 'modern slavery'. Here, concerns centred around both domestic work and labour outside the home but upon which housing was contingent. That included one participant from Northern Ireland describing cases of some farmers in Northern Ireland reportedly using *Homes for Ukraine* to get people over to work for them but then also charging them rent (despite getting the thank you payments from the Government). The accounts given here speak to an understanding of trafficking and other more routinised exploitation as occurring on a continuum, as illustrated below.

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[51] BBC. (27 September 2022). Homes for Ukraine: Paedophile hosted family in County Armagh before checks complete. Last accessed 13 March 2024.

> "We've had reports of a few guests saying that their sponsors work long hours, and the sponsors have children, and the sponsors are saying "Oh here's the car, could you go and pick my children up?" or "I won't be back till 9pm, could you babysit the children in the evening?". Things like that. But the Ukrainians feel that they're compelled to do it because they're living in their house rent free. So, there's that kind of...it's not like overt trafficking...But there's still those elements that could potentially be regarded as exploitation."
>
> **Participant 5 (Local Authority, East Midlands)**

> "There have been some very strange situations where some small businesses advertised, have gone online, saying,"We can host you and we can also offer you a job". And some people have thought, "That sounds good". And they arrive and it's a terrible job and terrible housing and it's not necessarily trafficking, but it could become trafficking if they stayed there."
>
> **Participant 1 (Civil society, Scotland)**

While there is obvious potential for abuse when *Homes for Ukraine* is used as a source of cheap, exploitable labour, we cannot comment on how widespread this practice might be. Notably, charging guests rent and making hosting contingent on particular work are both against the guidance of the *Homes for Ukraine* Scheme.

Some Scottish research participants considered the *Super Sponsor Scheme*[52] to reduce the risks of self-matching and safeguarding concerns related to hosting placements. However, five participants (either from Scotland or England) also had concerns about the Super Sponsor Scheme, including capacity becoming overwhelmed and thousands of people being temporarily accommodated on cruise ships and the risks of trafficking and exploitation that may present[53]. These tensions are evident in the quotes below.

> **"It's not like overt trafficking...But there's still those elements that could potentially be regarded as exploitation."**

> "That's [*Super Sponsor Scheme*] substantially better in terms of safeguarding than people arriving straight to a host and having barely any oversight. It allows a caseworker on your arrival in a kind of government welcome hub to talk to you about your rights. So, even if you've found a host, when by the time you've sat down with a caseworker and they talk to you about your different rights and options, you might decide that to your great relief, you don't have to go there after all, you have other options."
>
> **Participant 1 (Civil society, Scotland)**

> "The logistics of it have been really challenging...hence, we have thousands of people in in temporary accommodation waiting to be matched...we're already full. All our temporary accommodation is pretty much full."
>
> **Participant 9 (Civil society, Scotland)**

As participants explained, there is no payment for hosts or guests under *Ukraine Family Scheme* in most parts of UK (except in Northern Ireland[54]), or Scheme-specific funding for Local Authorities, and there

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[52] Wales and Scotland introduced a government backed *Super Sponsor Scheme*, which allowed applicants under *Homes for Ukraine* to name the national Government as their sponsor, as opposed to needing to identify a particular named individual who would host them. The Governments were then responsible for the matching process.

[53] As also mentioned in: JustRight Scotland. (September 2022). Reflections on the Ukraine Scheme in Scotland: Feedback from clients of Ukraine Advice Scotland. Last accessed 13 March 2024.

[54] In Northern Ireland, however, arrivals on the *Ukraine Family Scheme* are entitled to a one-off £200 welcome payment.

are limited rematching process or other housing options if placements break down[55]. They also stressed that there are no checks on housing conditions or sponsors on this Scheme beyond the basic eligibility requirements in terms of sponsors' immigration status. Participants also reported that not having follow-up checks then translated through into a lack of oversight of placements under the *Ukraine Family Scheme*. Moreover, Local Authorities were sometimes said to be ill-prepared for and overwhelmed by the number of *Ukraine Family Scheme* arrivals in their boroughs. These points are illustrated in the quotes below.

> "
> ## We are absolutely inundated with people wanting rematching."
> **Participant 19**
> **(Local Authority, Northwest England)**

> "It's completely like, "Well, you're with your family, off you go", whereas we know that family members have come across who've got community care needs, who we don't know the quality of the relationship at all because they can be quite distant family relationships. Who's going in and doing any assessments? Or just going in and checking to see how people are from a safeguarding perspective?"
>
> **Participant 6 (Civil society, UK-wide)**

> "Some of them were slightly blindsided by the numbers of the Family Scheme that were coming through because they didn't have any sight of where they would be coming into."
>
> **Participant 8 (Strategic Migration Partnership)**

Many participants, from Local Authorities and beyond, said they thought there were many more challenges yet to come from the perspective of exploitation risks. That was particularly in light of hosting relationships coming to an end and the reported impacts of the cost of living crisis and compassion fatigue in reducing people's willingness and capacity to host displaced Ukrainians. Indeed, since then the Office for National Statistics has found that in August 2023 two-thirds of current Homes for Ukraine hosts reported that the rising cost of living was affecting their ability to provide support[56]. In our research, there was also some mention of a similar 'hardening of attitude' (Participant 1, Civil society, Scotland) among Local Authorities themselves, with some areas reportedly refusing to accommodate any rematches from out of area. These arguments are illustrated below. It should be noted that, since our interviews, changes were made to encourage hosting to continue: namely extending the duration of thank you payments and offering a higher payment of £500 rather than £350/month if hosting people who had been in the UK for over 12 months already[57]. Despite these important provisions, recent research[58] shows that homelessness in this cohort is still a major and growing concern.

> "These people need our help and the reality without that help is that large volume of people will face homelessness and destitution."
>
> **Participant 3 (Civil society, UK-wide)**

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[55] Whenever there is a breakdown, Ukrainians could be rematched with other guest interested (person of interest) registered to host Ukrainians in their house. Of the three *Ukraine Schemes*, only guests of the *Ukraine Sponsorship Scheme* (Housing for *Ukraine Visa Scheme* and *Super Sponsor Scheme*) may be regrouped with other guests.

[56] Office for National Statistics. (2023). Experiences of Homes for Ukraine Scheme sponsors, UK: 10 to 21 August 2023. Last updated 4 October 2023.

[57] See, eg., Meade, L. (2023). Homes for Ukraine: what happens after six months?. House of Commons Library; NI Direct (no date). Homes for Ukraine - information for sponsors. Last accessed 13 March 2024.

[58] Bramley, G. (2023). Homelessness among displaced Ukrainians in the UK: Summary of research findings. Red Cross and Herriot-Watt University.

One participant, from Northern Ireland, was unusual in stressing positive experiences of the authorities there taking steps to find people in precarious situations alternative accommodation at short notice. For many, however, the main concern was that housing options were simply so limited that Local Authorities' hands were effectively tied in what they could offer. These were often stressed to be issues affecting (non-Ukrainian) asylum seekers and refugees at large too, as illustrated below.

> "If you're in priority need then they put you in temporary accommodation. But that can be a very, very low quality...like it's often very unsuitable and then you might be moved into more stable accommodation, later on if there is any."
>
> **Participant 1 (Civil society, Scotland)**

> "We know homelessness and the issue of housing stock isn't one that's just facing Ukrainian refugees. Afghan refugees, all refugees are facing an issue of being moved into dispersal accommodation. And so, it's something the government needs to think about and to deal with head on...there might be small fixes for the Ukraine Schemes itself, but there are broader fixes to the entire system which are needed."
>
> **Participant 2 (Civil society, UK-wide)**

> "It is incredibly expensive to rent privately here. There is an enormous homeless problem here already. And now you're writing onto it hundreds of Ukrainian people who are also now becoming homeless and there just isn't the capacity in the system to help them. So, I mean, obviously the local authority have to help them, but it's extremely difficult for them to do that because there's no extra provision for them to do that. So, the local authorities are really, really struggling to meet the demand for housing."
>
> **Participant 7 (Civil society, London)**

2. Challenges around work and labour exploitation

Participants identified several issues related to work and employment, including finding suitable work, the challenges of precarious or unofficial work, lack of employment support, language challenges, challenges around childcare, and difficulties transferring qualifications[59]. As with housing insecurity, many (*n*=15) participants were most concerned about the underlying conditions that create vulnerability to exploitation as opposed to focusing on specific situations of exploitation they had already encountered (although various participants did also flag such cases). Housing insecurity and work insecurity were seen as tightly interwoven, as illustrated below. Concerns were also raised that people do not necessarily recognise situations as exploitative, or even if they do they have few viable alternatives, as illustrated below.

> "A few months ago, it was very much about the risks. Now it's about there are cases, there are cases of labour exploitation, there are cases involving children. We see this happening and again as the vulnerabilities increase for people then they often see no way out but to accept work that is exploitative. And one of the key concerns at the minute within cohorts are employment and accessing safe employment."
>
> **Participant 4 (Civil society, Scotland)**

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[59] Unusually, special provisions were actually implemented to enable Ukrainians to get recognition of academic and professional qualifications. See, Benson, M., Sigona, N. and Zambelli, E. (2024). Humanitarian Visas in a Hostile Environment, MIGZEN Research Brief.

Many participants highlighted the lack of employment support available, which they saw as needed so that people can become financially independent. Again, these were seen to be challenges common to other refugees in the UK, although the (understandable) focus on addressing housing insecurity was said by some to have left little funds available for focusing on support around work (as illustrated below). Recognising that many Ukrainian refugees are single mothers, participants cited issues around childcare as barriers to employment (as well as balancing work and childcare making it difficult, if not impossible to even find time to take free English lessons, if those were even available locally).

> The employment is the missing link. You know there's not been much attention on employment. And a lot of them, the employment that is happening has been kind of organised within the Ukrainian community, WhatsApp groups... opportunities here, opportunities there. Government has really provided very little, very, very little in terms of employment support. And I think accommodation and healthcare and education has been much better coordinated than employment."
>
> **Participant 25 (Civil society, Northern Ireland)**

> "We were concerned that in the [region] because house prices are quite expensive, that many of our local councils were using the tariff funding to help support people with their rent. And therefore, the amount of money that could be spent on integration and employment activities was limited."
>
> **Participant 8 (Strategic Migration Partnership)**

"

I've seen quite a lot of few inquiries and people who've arrived somewhere, they themselves haven't felt very safe or very happy and they have left."

Numerous participants characterised support to access regular employment for Ukrainians as a preventative measure against exploitation, because of the way it can help reduce people's reliance on more casual or unofficial work (often perceived as riskier). This support could include assistance with searching for jobs, help to transfer qualifications, access to childcare, and more information sharing around labour rights in the UK. Generally, labour market exploitation was seen as the greatest risk to displaced Ukrainians in the UK, and not necessarily what Local Authorities would be expecting to need to respond to, as illustrated below.

> "Well, I think labour exploitation is definitely one of the highest risks. We've got labour gaps, huge labour gaps, in our labour market and Ukrainians are desperate to work. So, it's not difficult to understand how that could be exploited. So, I think that's definitely a risk, and we're beginning to see anecdotal signs of that."
>
> **Participant 9 (Civil society, Scotland)**

Numerous participants stressed, however, that compared to most displaced people arriving in the UK, those on the *Ukraine Schemes* are unusually well-positioned because their immigration status includes the unrestricted 'right to work'[60] and recourse to public funds (i.e. enabling them to claim benefits etc). This point is illustrated below, including experience of situations in which these rights have enabled people to leave situations in which they were uncomfortable.

[60] In contrast, many asylum seekers face a combination of very low support payments and being denied the 'right to work', which can render them especially vulnerable to exploitative work in the irregular labour market (see, e.g., Lewis, H., Dwyer, P., Hodkinson, S. and Waite, S. (2014)). Precarious lives: forced labour, exploitation and asylum. Policy Press.

"The main safeguard against trafficking of Ukrainian arrivals...is the fact that people are arriving with a visa, so they arrive with leave to remain, with the right to live and work anywhere in the UK, with the right to access public funds. And that itself is a significant safeguard against exploitation compared with the visa rights of other migrant populations in the UK who have often got very restricted rights to kind of normal, social welfare safety nets or might be tied to one area or one sponsor...so I've seen quite a lot of few inquiries and people who've arrived somewhere, they themselves haven't felt very safe or very happy and they have left. And they are in a position to be able to leave because of the kind of visas that they've got."

Participant 1 (Civil society, Scotland)

It was also recognised that exploitation (including the extremes of trafficking) is not limited to the irregular labour market or to people with insecure immigration status, but that it can also occur in the regular labour market[61]. Thus, in addition to housing insecurity and multiple dependencies with the *Homes for Ukraine* Scheme (see previous theme), job insecurity, difficulties in finding work, and a lack of information about labour rights were mentioned as risk factors for labour exploitation. Additional concerns were raised about people whose accommodation was contingent on working for a given employer, and the additional barriers that can create to reporting or extricating oneself from situations of labour exploitation (which may or may not reach the threshold to be considered labour trafficking or other 'modern slavery'). These points are illustrated below.

"They are unlikely to be aware of what their rights are. And even if they are aware of their rights, they are very unlikely to wish to assert their rights because understandably they are worried that if they speak up about their employment conditions, they can then lose their accommodation as well as losing their employment, so it is a real disincentive for people to assert their employment rights."

Participant 25 (Civil society, Northern Ireland)

"

Not knowing what is legitimate and not legitimate can lead to potential exploitation. It may not hit the threshold for modern slavery, but it might mean that they're not paid National Minimum Wage or all the other requirements that they should have under employment law."

Participant 12,
(Civil society, UK-wide)

In addition to broader concerns around precarious work and difficulties finding work, seven participants raised particular concerns around the exploitation of displaced Ukrainians in the agricultural sector. Here, there were clear intersections with concerns about information and support being made available to workers on the *Seasonal Worker Visa*. Some participants were critical that the Westminster Government had done little to support Ukrainians on *Seasonal Worker Visas*, pointing to a lack of practical support, specialist independent advice or information targeted at this group about their rights at the time to shift to the far more generous *Ukraine Extension Scheme*. For example, and speaking from case work experience, two participants explained their key concerns as follows.

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[61] See, eg., Cockbain, E., Bowers, K. and Hutt, O. (2022). Examining the geographies of human trafficking: Methodological challenges in mapping trafficking's complexities and connectivities. Applied Geography.

"And the Seasonal Worker Visa Scheme remains a source of massive concern. It's a visa Scheme with really poor working conditions and there are still Ukrainians on that visa Scheme now [as of October 2022, when this interview was done]. But it's not clear that any outreach has done to kind of make sure everyone knows they can apply under the Extension Scheme and has been helped to make these applications...they [the Scheme Operators] could be reaching out to people and telling them about how to get a better visa. It's probably not in their financial interest to do that...But the Home Office could perhaps make them do that, make it a term of their contract with them. Or send them a notification that they must send on to the person or send it directly to the person themselves. But that hasn't happened, and they're a particularly vulnerable population to exploitation."

Participant 1 (Civil society, Scotland)

These participants described encountering Ukrainians whose *Seasonal Worker Visas* had expired post invasion but had not been supported to access to information about options available to them. They also spoke about workers who had entered the UK via the Irish land border without any visa in the first place. In the latter instance, there were worrying indications that certain unscrupulous farmers were deliberately encouraging Ukrainians to enter irregularly, thus leaving them more exploitable, as illustrated below.

"Quite a few of the Ukrainians when they came to speak to us, they didn't have any visa. And they had been somehow recruited by these farmers before they arrived in Northern Ireland. And their employer/sponsor was saying to them "Oh, just come on up, come on up, we'll get your visa sorted once you arrive"...So, they were working unlawfully, they had no bank accounts, they had no National Insurance numbers. In some cases, they were being paid on kind of a prepaid card, which would suggest to us that the employers knew that they were here unlawfully."

Participant 25 (Civil society, Northern Ireland)

3. Immigration insecurity and limits to accessing specialist immigration advice

Despite the existence of the *Ukraine Schemes*, some participants stressed that insecure or irregular immigration status and limited access to specialist immigration legal advice nevertheless presented particular challenges. That could in turn, it was suggested, increase vulnerability to exploitation. It was also seen to present broader challenges around feeling insecure and having difficulty forward planning, as also documented in prior research[62].

Issues arising from particularly precarious immigration status were also reported to affect, among others, Ukrainians already in the UK undocumented prior to the eligibility start date for the Ukraine Schemes, those who entered the UK irregularly via the Irish land border and thus had undocumented status, and Ukrainians on the short-term *Seasonal Worker Visa* who had not been made aware of their right to move onto the *Ukraine Extension Scheme*. As one participant noted, some European countries – such as Spain – took the decision to offer routes to regularisation for Ukrainians already in Spain irregularly before the February 2022 invasion[63]. They stressed the contrast in how the UK Government had continued to exclude – officially at least (in practice, discretion was said to be possible) – some Ukrainians already in the UK from access to the *Ukraine Schemes*. These points are illustrated below, including a frustration at the lack of clarity, consistency and urgency in resolving such issues.

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[62] Benson, M., Sigona, N. and Zambelli, E (2024) Humanitarian Visas in a Hostile Environment, MIGZEN Research Brief.

[63] Consejo de ministros [Council of Ministers]. (8 March 2022). Secretaría de Estado de Comunicación.

"There are people who are being shut out of the Schemes. And as a result…they become vulnerable to potentially exploitation and different forms of it…before February 2022, there was a pretty significant cohort of undocumented Ukrainian migrants in the UK…there are rules which shut them out effectively. Now that's rules and that's not to say decision makers can't apply discretion and a lot of undocumented Ukrainians – at least undocumented before the full-scale invasion – they at the Home Office's discretion were allowed to regularise…it seems that now the Home Office are putting a lot of these attempted regularisation applications on hold for months on end, whereas in March [2022], for example, they would have taken a few days. And these people are still in limbo, not knowing, and their immigration advisers by extension too, not knowing if or how or when they will be able to regularise their immigration situation, and obviously they can't go back to Ukraine, at least for the foreseeable future."

Participant 13 (Civil society, UK-wide)

As participants suggested, it is unclear why Ukrainian nationals without immigration status are not automatically regularised given the ongoing nature of the war in Ukraine and the human and practical costs together with the risk of exploitation created by undocumented status. We would suggest, in line with some participants, that it might be linked to the Government's concern at net migration figures remaining high and its increasingly hostile immigration policies at large (*eg.,* punitive new laws and harsh political rhetoric around irregular migration).

As mentioned earlier, some participants also raised concerns about some people from Ukraine entering Northern Ireland (UK) irregularly via the border from the Republic of Ireland (European Union) and ending up in a confusing and legally precarious situation, as illustrated below.

"It's confusing for Ukrainians because we have two very different systems on one island. And sometimes, of course, they don't really understand that they have crossed the border, because the border is invisible. And then…we speak to Ukrainians who say, "Well, we thought we were automatically going to get a one-year temporary protection". And we say, "Well, no, that would be the case if you were in the Republic of Ireland. But you have crossed the border, you're now in Northern Ireland, you're part of the United Kingdom, and you have to get a visa"."

Participant 25 (Civil society, Northern Ireland)

Arriving this way means they are reportedly very unlikely to get their passport stamped either, in turn making it harder to evidence when they arrived in the UK in case of later attempts to regularise their immigration status. Steps appear to have been made, however, to address this issue within with a Northern Irish legal expert (Participant 25) noting that, "Thankfully, there is a system in place whereby people who are here without visas can regularise their status in country, so that is that is positive, and the Executive Office liaise with the Home Office to get a process in place". Nevertheless, another participant (from Scotland) spoke to examples of people facing long delays and considerable difficulties while awaiting regularisation and the need to ensure inclusivity of irregular arrivals, as illustrated below.

"I think there are some people who've arrived irregularly one way or another, and just making sure that they're not excluded from the Schemes. There's no reason someone would have arrived irregularly other than because of some compelling circumstances, right? Because you could have applied for a visa, you could have a safe and legal route. But people, particularly because Ireland had open borders for Ukrainians and then they could just walk across the border into Northern Ireland or into the UK, people have arrived that way, either accidentally or just because they've desperately needed to join family. But they're in a vulnerable category because they don't have rights to access public funds or rights to work. And because their cases are more complicated, when they apply under the Ukrainian visa Schemes, they're often left for months without a decision. So yeah, they're particularly vulnerable."

Participant 1 (Civil society, Scotland)

Immigration advice is regulated in the UK. In Scotland and Northern Ireland, the national Governments have funded specialist immigration advice services for Ukrainians. Immigration lawyers in England have offered free legal advice to Ukrainians (particularly through the Ukraine Advice Project). One participant also stated that there was a Home Office helpline for *Ukraine Scheme* queries and the application process was "comparatively with other visas, straightforward" (Participant 1, Civil society Scotland), meaning many people could do them independently, but that there was a broader lack of "mainstream legal advice". However, pro bono support was said to depend on the availability of professionals who individually volunteer their time and expertise, rather than a more sustainable and centrally resourced response. Sweeping cuts in the UK around eligibility for legal aid for immigration advice in general[64] were also noted, as well as the *Ukraine Scheme* falling outside of legal aid. Although that is not a Local Authority power or responsibility, access to legal advice was seen as a core part of the context in which Local Authorities are operating and a key feature affecting vulnerability to exploitation. The Westminster Government's increasing dependence on civil society organisations to fill the gaps was highlighted by some participants, alongside a sense of frustration that their concerns were not being listened to or acted upon, as highlighted below.

> "Whilst they don't really seem to be listening to us, they also seem to be depending on us. So, we're supposed to be the ones who provide the free legal advice. We're supposed to be the ones who make sure that these relevant safeguards are brought to their attention. And then we receive no proper response, or we do respond, and they simply ignore it and do what they said they were going to do anyway."
>
> **Participant 2 (Civil society, UK-wide)**

Numerous participants, both from Local Authorities and beyond, reported considerable frustration on the part of themselves and those they support about the lack of clarity around what would happen after the initial three-year permissions. Here, concerns were raised about potentially large numbers of people becoming irregular and thus more vulnerable to all sorts of issues, including exploitation. These points are illustrated below. It should be noted here that the February 2024 announcement that people on existing *Ukraine Schemes* may be able to extend their visas three months prior to expiry for 18 months does little to allay these concerns. There is still no route to settlement or longer-term security. The lack of longer-term security for people on the *Ukraine Schemes* has also been highlighted as a major issue in other research[65].

> "And we get asked every day we get asked what happens after 12 months, what happens and why we just don't know…it's such an unknown and it's such a big question within our community like our Ukrainian community, it's quite stressful for them all."
>
> **Participant 14 (Local Authority, Southwest England)**

> "I think that the main risk in the future is that people have only got a three-year visa and people are going to start to feel desperate about that, like we're already getting more inquiries about it. But, I think people are going to start to feel worried about that as time goes on. And then if they don't extend people's visas or offer them a settlement route, there will be a risk of a huge number of people becoming irregularly present in the UK. And then they'll be very much more at risk than they are now because they won't have any of those extra options that offer safeguards now. So, I think that's a massive risk for the future about having a time limited mass humanitarian visa Scheme."
>
> **Participant 1 (Civil society, Scotland)**

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[64] See, e.g., NRPF. (no date). Legal aid: who can get legal aid and how to apply for exceptional case funding; Bail for Immigration Detainees. (29 May 2019). Serious concerns raised about access to justice in immigration detention. Last accessed 13 March 2024.

[65] Benson, M., Sigona, N. and Zambelli, E. (2024). Humanitarian Visas in a Hostile Environment, MIGZEN Research Brief.

Finally, despite being positive about the rights and recourse made available to Ukrainians, several participants also expressed unease about inequitable treatment of different nationalities of people seeking sanctuary in the UK, as illustrated below. As such, a common call was improved provisions for all, not just for Ukrainians. Again, that also speaks to concerns raised elsewhere in the research literature[66].

> "And I think it's quite uncomfortable sometimes to think you're doing all of this work, and all of this stuff can be done, but only for one group of people. And it doesn't always feel fair, and I know that's what we're working with and I'm not suggesting we should not support Ukrainians in the way we are. But I think it's quite difficult for organisations, particularly those who work with lots of different groups of refugees, to say I can do all of this only if you're Ukrainian and I can't do this for everybody else."
>
> **Participant 15 (Local Authority, Southwest England)**

4. Challenges in identifying and acting on potential trafficking and exploitation

Although participants widely perceived many *risks* around possible exploitation of displaced Ukrainians in the UK (across the spectrum of exploitation), many of them said they had personally encountered few if any specific such cases thus far (to recap, the interviews were conducted in October to December 2022, *i.e.* roughly seven to nine months after the first Scheme opened).

Overall, five of the 11 Local Authority participants said they had already identified cases they saw as 'lower-level' exploitation of Ukrainians in their areas but only one reported also encountering more extreme exploitation that they saw as trafficking. A sixth had suspected potential trafficking/'modern slavery' of Ukrainians on a farm locally but had investigated and deemed the situation to be non-exploitative. Two further Local Authority participants spoke of issues they had been made aware of in other areas: a Ukrainian national in severe labour exploitation on a farm; and someone who applied to host under *Homes for Ukraine* and was found to have a trafficking conviction (this is separate from the would-be host who turned out to be a registered sex offender, discussed previously). Several stressed that they were trying to stay on top of risks of trafficking and exploitation on an ongoing basis, as illustrated below.

> "And I think it's quite uncomfortable sometimes to think you're doing all of this work, and all of this stuff can be done, but only for one group of people."

> "But the good thing is…we're not picking up that information and that these are ongoing concerns."
>
> **Participant 26 (Local Authority, East of England).**

Of the 15 non-Local Authority participants, seven said they had encountered situations of exploitation through their work (but these were rarely if ever seen to tip the legal threshold into trafficking or modern slavery). Two others said they knew second-hand of such cases. Those with the most exposure to exploitative situations involving Ukrainians tended to be participants doing frontline legal casework. Some were sceptical, from their experience, that Local Authorities would be well-placed to recognise and respond to exploitation or felt it had not been a major priority (in part because of the understandable need previously to prioritise issues perceived as more urgent in implementing the *Ukraine Schemes*).

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[66] See, eg., Benson, M., Sigona, N. and Zambelli, E. (2024). Humanitarian Visas in a Hostile Environment, MIGZEN Research Brief; Tomlinson, J. (2022). 'Bureaucratic Warfare: Administrative Justice and the Crisis of the 'New Bespokism''. Journal of Immigration, Asylum and Nationality Law.

Participants raised various reasons they thought Local Authorities were unlikely to identify issues, including lack of prioritisation, limited ongoing contact with displaced Ukrainians, insufficient pathways to encourage reporting, and those affected not trusting Local Authorities. Generally, it was said by many that other frontline organisations and communities at large were better placed to identify issues as they arose, again echoing perceptions in prior research[67]. There was, however, also some frustration that more protective measures had yet to be implemented (eg. one participant suggested key workers be made available for what they saw as a fairly small proportion of displaced Ukrainians likely to need additional targeted support). These points are illustrated below.

> "They don't trust authorities. They don't trust the Local Authority. And particularly not if they're scared children will be removed...Local Authorities need to work with interlocutors here."
>
> **Participant 4 (Civil society, Scotland)**

> "And we're only finding situations of exploitation where people have already left their placement. So, they found the way out of it, and they've reported themselves to a local authority or to an NGO and then it's been reported at that point. So, what we're not doing is encouraging people encouraging people to report inappropriate or exploitative placements. And we're not offering them the right mechanisms of support to do that."
>
> **Participant 3 (Civil society, UK-wide)**

> "I think they're [Local Authorities] pretty much overwhelmed and firefighting with the with what they see as the immediate need...it's not that they're not interested in the risks of trafficking, but it doesn't feel like that's the conversation for today."
>
> **Participant 9 (Civil society, Scotland)**

At that time of our interviews, it was pointed out by several participants (particularly those from civil society) that it might well take a while yet for more extreme exploitation (i.e. that which could constitute trafficking or modern slavery) to surface and start to appear in official statistics (eg. via NRM, Duty to Notify or Modern Slavery & Exploitation Helpline contacts). There were calls to be alert to emergent issues – particularly in relation to housing insecurity – but also not to generalise from limited and anecdotal evidence thus far. Some participants expressed a view that there was likely far more exploitation happening already at the time of interviews than had yet come to attention, that people themselves would necessarily self-identify as exploited and that the risks would increase with increased housing and immigration insecurity. Some of these points are illustrated below.

> "We may not be aware of people that have disappeared into exploitation or are currently being exploited, and that will take a while to sort of work its way through the system. So, all we can give you is anecdotal. There isn't sort of statistics at this point."
>
> **Participant 12 (Civil society, UK-wide)**

> "We're beginning to see anecdotal evidence of concerns about exploitation now. But up until maybe two months ago...other partners who don't work in anti-trafficking weren't reporting anything and now we're seeing people reporting."
>
> **Participant 9 (Civil society, Scotland)**

> "And people are presenting in their thousands to homeless services for local authorities as Ukrainians and families. That the real risk now and the real opportunity for exploitation and damage and harm is there."
>
> **Participant 22 (Civil society, Northwest England)**

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[67] Cockbain, E. and Sidebottom, A. (2022). 'War, Displacement, and Human Trafficking and Exploitation: Findings from an evidence-gathering Roundtable in Response to the War in Ukraine'. Journal of Human Trafficking.

Local Authority participants described facing different challenges in detecting and responding to potential trafficking and exploitation, including in relation to having limited support and advice from the Westminster Government. Some explained that if a visa had already been issued to a Ukrainian and they had already arrived with the sponsor, even where serious concerns are identified by Local Authority staff, they were very limited in what action they could take if the guest chose to remain with the host. Several Local Authority participants said that they had had guests who fell out of contact with them or disappeared for some time or permanently (which may or may not indicate problems, as they noted). Concerns about a lack of centralised monitoring or coordination of such concerns are illustrated below.

> "We had a number of families and individuals just disappear. Once into the UK they just disappeared, and we had no way of knowing if they were safe or in circumstances which placed them at risk, for example, around labour exploitation, criminal exploitation…but there was no central coordination of that either. So, it's very difficult to sort of track people."
>
> **Participant 26 (Local Authority, East of England)**

Levels of awareness and understanding of trafficking and exploitation (across the spectrum) appeared to vary among participants. Some participants – both from civil society and Local Authorities – felt there were real blocks to identification of such issues because of Local Authorities not being aware of how to identify issues and support those affected. Some participants in Local Authorities reported having received trafficking training, others had not. Some civil society participants said they worked closely with various Local Authorities, including delivering training. Several argued that awareness and training provisions were highly variable within Local Authorities and dependent on roles and regions, as illustrated below.

> "So, I think generally within Local Authorities, there's not very much understanding of trafficking. And there's no training in place…very, very little knowledge, very little knowledge. Especially…in areas that are outside big cities where there's much more migrant focused organisations."
>
> **Participant 5 (Local Authority, East Midlands)**

Some Local Authority participants said when they had identified possible situations of exploitation or trafficking of people who had used the Homes for *Ukraine Scheme*, they had raised tickets to DLUHC via the Jira helpdesk. Four participants discussed their experiences of raising such concerns (including in relation to what they termed 'fraudulent sponsors'). Concerningly, they often described frustration about such concerns not seeming to have been taken seriously by DLUHC or the Home Office, and a lack of perceived follow up actions or investigation. As such, they questioned whether such reporting was actually in the best interest of the individuals they were supporting or the best use of their time and capacity. The sense of frustration is evident in the quotes below.

> "And when we have had those concerns, it just feels like it feels like the Home Office and…DLUHC… it just feels like no one's listening, no one's doing, no one is acting on our concerns. And, and luckily, we've had a very, very small number of those situations. But when they have happened, they're quite worrying for everybody and trying to get any action on them is, feels very difficult."
>
> **Participant 15 (Local Authority, Southwest England)**

> "And this is something that we have flagged to DLUHC time and time again, where it can just be like one letter, everything at the same address, same e-mail address, same date of birth, everything, it's the same person [submitting numerous Homes for Ukraine sponsorship applications]. And they just keep on coming through. So, we're trying our best to kind of stop this stream of exploitation. We have got a couple of what we're calling sponsors – even though they're not sponsors – who are doing this repeatedly. And yeah, that's been the frustration with DLUHC that we can't put a stop to it. We're just having to deal with these people as they turn up."
>
> **Participant 19 (Local Authority, Northwest England)**

In contrast, another participants discussed an experience with a concern that they felt had been taken very seriously, as highlighted below.

> "When there was this referral with the person [*Homes for Ukraine* host] who had a previous history with the Serious Crime Agency [i.e. National Crime Agency] and we couldn't locate the guests, then the Home Office were in contact with me every day. So I had named people."
>
> **Participant 24 (Local Authority, Southwest England)**

In addition to these concerns from within Local Authorities, various civil society research participants also reported problems with governmental responses when they raised issues relating to potential trafficking or exploitation of displaced Ukrainians. Here, they appeared particularly frustrated about thresholds for intervention and less extreme labour market exploitation not being taken seriously enough. In relation to cases on farms in Northern Ireland recruiting people for labour through the *Homes for Ukraine* Scheme and treating them poorly (eg. excessive deductions from wages), one participant described their frustrations as follows. The longer quotes below also illustrates difficulties in distinguishing where thresholds lie for human trafficking or modern slavery, the need to ensure peoples' rights are upheld even if such thresholds are not crossed and dangers of relying on complaints-based enforcement. Their concerns resonate with issues raised elsewhere about the complex, confusing and fragmented nature of labour market enforcement in the UK, with its considerable onus on individual enforcement of one's own labour rights[68].

> "We're very disappointed that overall the Government seems to have said, "This is not trafficking, it's not slavery, therefore there is no need for an enforcement response". And what they have done is say, "If the workers have complaints, they should raise those complaints with, for example, the Health and Safety Executive, or if they're not being paid minimum wage, they should contact HMRC...if they've been subject to many deductions, they should contact the Agricultural Wages Board". They are basically saying the onus is on the individual Ukrainian worker to firstly identify the relevant enforcement body, and secondly pursue a complaint...our view is that it is not good enough...we say you cannot just rely, you cannot place the onus on the worker. You have obligations under international human rights law, under trafficking legislation... You can't just sit and wait for the complaints to be submitted."
>
> **Participant 25 (Civil society, Northern Ireland)**

> "
> **Before the Ukraine Scheme, there were Ukrainians living on these farms but we never met them. But thankfully now, as a result of the Ukraine Scheme, as a result of these Ukraine assistance centres, they are coming forward and we are able now to kind of understand what is happening on these farms..."**

> "We have an Agricultural Wages Board which is responsible for agricultural workers. We met with them recently and since 2019 they have not received a single complaint from an agricultural worker. Not one complaint...Like it's absurd to think that someone who has fled war, who's ended up working on one of these farms... sharing a caravan with someone she doesn't know. It's absurd

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68 See, eg., Cockbain, E., Scott, S., Pósch, K. and Bradford, B. (2019). How can the scale and nature of labour market non-compliance in the UK best be assessed? Final report of a scoping study for the Director of Labour Market Enforcement, London; and Judge, L. and Slaughter, H. (2023). Enforce for good: Effectively enforcing labour market rights in the 2020s and beyond. London.

to think that she'll somehow find out about this obscure Agricultural Wages Board and finds your complaint form on your website and fills it in in English correctly and sends it to you…If you are waiting for that to happen, it will never happen."

Participant 25 (Civil society, Northern Ireland)

That same participant stated that issues of labour exploitation on farms in Northern Ireland identified through Ukrainians being able to come forward to switch off the *Seasonal Worker Visa* onto the *Ukraine Extension Scheme* appeared to be persisting for other nationalities who have since filled vacancies on the farms. Their call therefore was not to look only at issues faced by displaced Ukrainians but to ensure that this opportunity was taken to recognise and address labour exploitation risks under the *Seasonal Worker Visa* more broadly. This point, illustrated below, also resonates with the broader evidence base about the need to address exploitation risks and harms related to this restrictive visa Scheme[69].

> "Before the Ukraine Scheme, there were Ukrainians living on these farms but we never met them. But thankfully now, as a result of the Ukraine Scheme, as a result of these Ukraine assistance centres, they are coming forward and we are able now to kind of understand what is happening on these farms…we've heard that people are coming now from Tajikistan to take the place of the Ukrainian workers… they are stuck on their six-month visa, and they can't transfer out of the six-month visa… given that Government is interested, let's use the *Ukraine Scheme* to improve conditions on those farms for the non-Ukrainian workers too."

Participant 25 (Civil society, Northern Ireland)

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[69] See, eg., FLEX and Fife Migrants Forum. (2021). *Assessment of the risks of human trafficking for forced labour on the UK Seasonal Workers Pilot.*; and Sehic, A. and Vicol, D. (2023). *Systemic drivers of migrant worker exploitation in the UK.* Work Rights Centre.

Conclusion

Russia's war in Ukraine has caused millions of people to be forcibly displaced within and outside Ukraine. Conflict can create and exacerbate risks of human trafficking, exploitation, and abusive situations. These risks also exist once people fleeing the conflict arrive in destination countries, such as the UK. Such countries therefore also have an important role to play in understanding, anticipating and mitigating such risks. The UK's *Ukraine Schemes* represent in many ways a vast improvement in access to rights and protection, as compared to the very limited options available to displaced people of other nationalities seeking refuge in the UK (with the obvious exception of there being no pathway to settlement). The argument here, is neither to reduce Ukrainians' rights nor to privilege them at the expense of other groups, but rather to understand where risks and harms nevertheless persist and implement ways to address them. That is important both in improving people's overall welfare and acting on likely causal mechanisms perceived as creating vulnerabilities to trafficking and exploitation – at present and in future.

This report has attempted to capture a snapshot of views from professionals supporting Ukrainians seeking safety in the UK as to what issues they have encountered and their views on responses thus far. We approached the issue with a particular focus on trafficking and exploitation risks. Despite the important and widely-discussed safeguards associated with having greater rights (to work, to access public funds etc), it was clear that issues and risks remain. These were primarily discussed in terms of broader structural and situational conditions that produce precarity and limits to longer-term proactive planning and coordination. Participants in this research identified overlapping intervention areas as key to reduce the ongoing risks of exploitation faced by some Ukrainians seeking safety in the UK. The findings speak to a clear need to focus on alleviating insecurity in housing, work and immigration status, and to work to identify and respond to situations of exploitation more effectively. That must include prevention of exploitation which does not reach the threshold of trafficking/'modern slavery' but nevertheless causes harms to those affected and could escalate if left unchecked.

Recommendations

The evidence from these interviews has led to the formulation of twelve core recommendations to the Westminster Government (particularly the Home Office). These are designed to address risks of ongoing or escalating exploitation in the UK that relate to the war in Ukraine. While the recommendations arise from project-specific findings, some of them would likely also have broader benefits for other marginalised groups as well. There are also important lessons to be learned for future crisis responses.

Reduce immigration insecurity and facilitate access to specialist immigration advice

1. Create an accessible, fast regularisation route for all Ukrainian nationals who are in the UK irregularly but not currently eligible for the *Ukraine Extension Scheme*. That should come together with free information and specialist support for applications.

2. Ensure there is sufficient flexibility in the *Ukraine Schemes* to allow for non-Ukrainian nationals displaced by the conflict to regularise their status in the UK via the same Schemes.

3. Extending the closing date of the *Ukraine Extension Scheme* beyond 16 May 2024, particularly since Ukrainians are still coming to the UK on *Seasonal Worker Visas*.

4. Require all Seasonal Worker Scheme Operators to inform all Ukrainians on this visa in a timely fashion of their right to switch to the *Ukraine Extension Scheme* and ensure workers who switch onto the *Ukraine Extension Scheme* are not included in the Home Office requirement that 97 per cent of sponsored workers leave the UK at the end of their stay.

5. Bring the *Ukraine Schemes* into scope for legal aid and proactively fund specialised immigration advice and support.

6. Establish a route to settlement for people on the *Ukraine Schemes* to provide security and stability.

7. Fund research into whether and how the provisions within the *Ukraine Extension Scheme* have helped prevent or mitigate exploitation, including trafficking, of Ukrainian nationals.

8. Fund further research on what is needed to ensure the *Ukraine Schemes* are sustainable, safe and can be replicated in the future for refugees from other conflicts.

Facilitate reporting and improved responses around situations of trafficking and exploitation identified among displaced Ukrainians in the UK

1. Implement secure reporting pathways so concerns around trafficking and exploitation (or other abuses) can be reported to the police without a complainant or witness fearing that their personal data will be shared with Immigration Enforcement.

2. Increase resourcing for proactive Labour Market Enforcement, with regular monitoring and inspections, targeted at high-risk workplaces. In doing so, however, it is vital that Labour Market

Enforcement does not involve Immigration Enforcement, either in joint visits or onward data sharing about workers' status (see point 1).

3. Implement measures to make it easier for all workers to identify and report breaches of their labour rights and facilitate recourse to justice (eg., through a Single Enforcement Body (SEB) for labour market non-compliance).

4. Provide further training to Local Authorities on the UK's National Referral Mechanism and individual advocacy needed to support a referral and help people who have been exploited access rights and entitlements, such as access to advice and compensation.

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