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UKRAINE (Tier 2)

The Government of Ukraine does not fully meet the minimum standards for the elimination of trafficking but is making significant efforts to do so. The government demonstrated overall increasing efforts compared with the previous reporting period; therefore, Ukraine remained on Tier 2. These efforts included identifying more trafficking victims; allocating more funds to victim assistance; and extensively cooperating with foreign counterparts on international trafficking investigations, despite diminished resources and capacity because of the Russia-Ukraine war. The government investigated and prosecuted officials allegedly complicit in trafficking crimes; developed new prosecutor guidelines for handling child trafficking cases; and conducted extensive awareness raising campaigns in coordination with international organizations. Despite major capacity challenges due to the ongoing Russia-Ukraine war, the government made significant efforts to mitigate trafficking risks. Nearly one-third of Ukraine's population has been displaced due to the war, increasing vulnerability to human trafficking. However, the government did not meet the minimum standards in several key areas. Authorities investigated and prosecuted fewer trafficking crimes, and courts convicted fewer traffickers. Judges continued to issue lenient sentences, including suspended sentences, for most convicted traffickers, which weakened deterrence and did not adequately reflect the nature of the crime. Despite persistent concerns of corruption and ongoing investigations of complicit officials, the government did not convict any complicit officials for the eighth consecutive year. The government did not identify any foreign national trafficking victims for the second consecutive year, and NGOs continued to identify systemic shortcomings in the implementation of the NRM and victim services.

PRIORITIZED RECOMMENDATIONS:

- Vigorously investigate and prosecute alleged trafficking crimes and seek adequate penalties for convicted traffickers, which should involve significant prison terms.
- Provide alternatives to requiring victims to be physically present in court for preliminary court hearings in cases where it is not possible because of displacement.
- Increase efforts to investigate, prosecute, and convict officials allegedly complicit in trafficking crimes under the trafficking statute.
- Increase efforts to proactively identify trafficking victims by screening for trafficking indicators among vulnerable populations, such as IDPs, refugees, unaccompanied and separated children, children evacuated from care institutions, persons with disabilities, migrant workers, women in commercial sex, and Ukrainian citizens whom Russia has forcibly deported to its territory or transferred inside Russia-occupied areas of Ukraine.
- Provide additional extensive training on the NRM and the difference between trafficking and other crimes for local officials, front-line workers, and service providers, and continue to expand the NRM nationwide.
- Increase training for law enforcement, prosecutors, and judges on the investigation and prosecution of trafficking cases, particularly labor trafficking, and the use of victim-centered and trauma-informed approaches.
- Consistently enforce strong regulations and oversight of labor recruitment companies, including by eliminating recruitment fees charged to migrant workers and holding fraudulent labor recruiters criminally accountable.
- Increase funding for anti-trafficking efforts, particularly in local communities.
- Increase the availability of trafficking-specific services in existing shelters and consider resourcing a shelter dedicated to victims of trafficking.
- Establish and fill a dedicated national coordinator position to lead national efforts to coordinate and implement anti-trafficking policies.

- Maintain victims' access to legal assistance throughout the criminal process and improve victims' ability to access court-ordered restitution in criminal cases and compensation through civil proceedings.

PROSECUTION

The government decreased anti-trafficking law enforcement efforts.

Article 149 of the criminal code criminalized sex trafficking and labor trafficking and prescribed penalties of three to eight years' imprisonment, which were sufficiently stringent and, with respect to sex trafficking, commensurate with those prescribed for other grave crimes, such as rape. The law defined trafficking broadly to include illegal adoption without the purpose of exploitation.

Law enforcement investigated 116 new trafficking cases – 29 for sex trafficking, 31 for labor trafficking, and 56 for unspecified forms of trafficking in 2024, compared with 142 investigations in 2023, 70 in 2022, and 222 in 2021. The government reported 578 investigations initiated in previous years remained ongoing. The government prosecuted 22 suspected traffickers – seven for sex trafficking, three for labor trafficking, and 12 for unspecified forms of trafficking in 2024, a decrease compared with 70 prosecutions in 2023, 70 in 2022 and 101 in 2021. The government investigated and prosecuted additional cases as “adoption for commercial purposes” and “use in the pornography business,” which are considered human trafficking under Ukrainian law, Article 149. The government convicted 24 traffickers in 2024, compared with 35 in 2023, 18 in 2022, and 24 in 2021. The government sentenced 17 of the 24 convicted traffickers in 2024; of the 17, only six (25 percent) received prison sentences (23 percent in 2023) and 11 received suspended sentences. Lenient sentencing practices weakened deterrence and did not adequately reflect the nature of the crime. Observers reported many judges underestimated the severity of trafficking crimes and continued to hold entrenched stereotypes about what constituted trafficking in persons, while others engaged in corrupt practices. Law enforcement capacity was limited by other critical wartime policing needs. Law enforcement only operated in areas that remained under Ukrainian government control. An international organization reported the Russia-Ukraine war significantly and adversely affected the court system, delaying judicial proceedings.

Corruption, particularly within the police and judiciary, and official complicity in trafficking crimes remained significant concerns, inhibiting law enforcement action. Although the government continued to report investigations and prosecutions of officials allegedly complicit in trafficking, the government did not convict any complicit officials for the eighth consecutive year. In 2024, the Lviv Prosecutor's Office prosecuted a government official for alleged sex trafficking in France; the Office of the Prosecutor General (OPG) investigated a former orphanage director, three former disability home staff, and two village deputies for alleged crimes related to labor trafficking. The government investigated two military service members for exploiting a disabled woman in forced criminality. The government reported multiple investigations involving complicit officials in trafficking crimes initiated in previous years remained ongoing.

The National Police of Ukraine (NPU) expanded its international and national partnerships to combat trafficking. The NPU and Migration Police (MIPOL) cooperated extensively with foreign counterparts, including Romania, the United States, and Italy, to exchange information for trafficking investigations. Since 2022, MIPOL and the NPU investigated trafficking cases among civilians, while the Security Service of Ukraine investigated war crimes, including those with a trafficking nexus. Authorities cooperated extensively with foreign governments on multiple transnational investigations including with Italy, Poland, and Germany; joint action days with EUROPOL; assistance with an interrogation via videoconference to Poland; and legal assistance.

There continued to be widespread turnover in many government institutions, including in the NPU and judiciary. Courts were critically understaffed, and judges did not specialize in trafficking cases. The impacts of the war, including power outages and disruption to Internet connectivity, delayed court proceedings. While the criminal code allowed for the use of video conference in preliminary

court hearings, procedural challenges limit its use; this resulted in more than 90 trafficking cases stalling in the courts, many of which involved IDPs. In 2024, 18 regional prosecutor working groups held 16 meetings to better investigate trafficking crimes and coordinate with law enforcement and NGOs. The government, with support from international partners, provided anti-trafficking training to law enforcement, social service workers, prosecutors, and border guards on various topics such as victim identification, sex trafficking, information technology in human trafficking, and working with child victims. All new police recruits received trafficking training; however, observers assessed MIPOL staff and NPU investigators were not sufficiently trained on trafficking due to staff turnover. In April 2024, the government approved new prosecution guidelines, which outlined best practices for prosecutors handling cases involving children, including child trafficking victims.

PROTECTION

The government increased victim protection efforts.

In 2024, the government reported granting official victim status to 178 victims – which allowed victims to access government services upon approval of an application – an increase compared with 110 officially identified victims in 2023, 47 in 2022, and 64 in 2021. The government also identified one victim of “sale of a child,” which is considered human trafficking under Ukrainian law. Concurrently, the Office of the Prosecutor General formally identified 55 trafficking victims (35 sex trafficking, 14 labor trafficking, and six other forms of exploitation), and the State Judicial Administration formally identified 44 victims of unspecified trafficking; the government did not report if these statistics were included in the 178 victims granted official victim status. Impacts of the Russia-Ukraine war reduced the government’s capacity to provide services to trafficking victims. Observers reported the war impeded the processing time for granting official victim status because of significant strains on resources and the displacement of staff. While some observers reported the government diverted anti-trafficking resources to the humanitarian response, others assessed the overall increase in humanitarian service provision, including shelters and aid to people in desperate need, reduced the risks of human trafficking, as coordination among service providers increased.

The government reported screening some foreign migrants for trafficking indicators; however, observers noted authorities did not consistently do so. Authorities did not report identifying any foreign national trafficking victims in 2024. The government did not report efforts to visit and screen for potential trafficking at facilities for IDPs and children as it had done in partnership with an international organization in previous years. However, the government reported screening Ukrainian children returnees who were forcibly deported to Russia for human trafficking indicators.

The government approved 88 percent (183 of 208) of applications for official victim status in 2024, in line with the 88 percent (118 of 134) of applications it approved in 2023. The National Social Service continued its role of granting official victim status to potential victims. The government drafted a bill to simplify the procedure for certifying official victim status by delegating this responsibility to local authorities; however, this bill remained pending for the second consecutive reporting period. Officials noted several factors that affected victims’ ability to apply for victim status, including some victims not being able to self-report trafficking crimes, some who may not have recognized they were exploited, or Ukrainian refugees exploited abroad who may not have reported exploitation to authorities upon their return to Ukraine. Observers noted male trafficking victims have been reluctant to seek assistance from the government because of a fear of being conscripted. NGOs reported victims exploited in Russia-occupied territories might fear coming forward to Ukrainian authorities for fear of being labeled as “collaborators” under a law passed in 2022 instead of being treated as trafficking victims. In the context of the Russia-Ukraine war, authorities informed victims of conflict-related sexual violence (CRSV) of their right to apply for official victim status. Experts expressed concern the government may conflate non-trafficking types of CRSV with sex trafficking, instead of seeing these as distinct but overlapping.

Newly devolved local administrative structures were part of the NRM; however, civil society reported continued, systemic shortcomings in the functioning of the NRM in part because of war-related capacity limitations, decentralization, and high personnel turnover. The Ministry of Social Policy (MSP) partnered with international organizations to expand the NRM nationwide even under conditions of martial law. Experts noted social services capacities at the local level were overwhelmed with providing services to IDPs. Some communities, especially smaller ones, lacked sufficient personnel, infrastructure, or financial resources to effectively provide services to trafficking victims. Observers noted some local officials responsible for identifying and screening victims were not trained on trafficking indicators. The government continued to rely on international organizations and NGOs, with international donor funding, to identify victims and provide most victim protection and assistance. While not all anti-trafficking organizations in Ukraine reported the number of victims they served, one international organization in Ukraine reported assisting 297 victims in 2024, compared with 374 victims in 2023, 361 in 2022, and 1,010 victims in 2021.

The government allocated 1,018,000 hryvnia (\$24,213) to victim protection via the national budget and an additional 1,879,000 hryvnia (\$44,693) to local budgets in 2024, compared with 970,000 (\$23,072) hryvnia to the national budget and an additional 1,914,000 million hryvnia (\$45,526) to local budgets for victim protection efforts in 2023. However, the government did not disburse any funds from the national budget in 2024, and it disbursed only 573,000 hryvnia (\$13,629) from local budgets. The government increased the one-time financial payment amount to adult trafficking victims from 8,052 hryvnia (\$192) to 9,084 hryvnia (\$216); the government reported 164 victims received this financial aid, totaling 1,431,000 hryvnia (\$34,037) in 2024. The anti-trafficking law entitled victims with official victim status to accommodations at a government shelter, psychological assistance, medical services, employment counseling, and vocational training, regardless of whether a victim cooperated with law enforcement or if a criminal case proceeded. The government did not operate a trafficking-specific shelter. The government reported vulnerable populations, including trafficking victims, could access government-funded services through a total of 69 shelters, 105 day centers, and 99 crisis rooms. The government reported 22 trafficking victims received shelter services in 2024. Adult victims could stay at government-run centers for psycho-social assistance for up to 90 days, with the option to extend, and receive psychological and medical support, lodging, food, and legal and social assistance. Authorities could accommodate families and child victims in 27 local government or NGO-run centers for socio-psychological support that could administer social, medical, psychological, education, legal, and other types of assistance. Authorities identified nine child trafficking victims in 2024; all received financial support and medical and psycho-social care. Observers reported government assistance remained insufficient to meet victims' needs, and victims continued to rely on NGOs for assistance. Foreign victims were entitled to the same benefits as Ukrainian citizens and had additional access to interpretation services, temporary legal stay, and voluntary repatriation. Although legally entitled to the same benefits, observers noted some foreign nationals and other vulnerable populations faced barriers to accessing services. Authorities could grant permanent residency to foreign victims in danger of retribution should they return to their country of origin. Foreign victims were able to obtain an immigration permit after residing continuously in Ukraine for three years.

The Witness Protection Law provided protections for victims; these protections were used multiple times in at least four oblasts in 2024. Victims with official victim status were eligible for free legal aid. Courts continued to utilize closed hearings and remote procedures for questioning and identification to protect victims during their participation in criminal justice proceedings, though implementation of these measures remained uneven in practice. The government, with assistance from an international organization, operated several regional specialized centers for child victims or witnesses. At these centers, specialized staff interviewed children in a trauma-informed manner and children received psycho-social, legal, and medical care, as needed. The OPG maintained a specialized staff member to assist all children in the judicial process. Trafficking victims were able to file civil claims and seek compensation under Ukrainian law. Courts granted compensation to two victims in 2024, while 36 trafficking civil claims remained pending in the courts. The government did not report awarding restitution to victims in 2024.

PREVENTION

The government maintained prevention efforts.

The Ministry of Social Policy (MSP) led anti-trafficking efforts at the national and local levels, but the war negatively impacted the ministry's resources and personnel. Observers continued to criticize shortcomings in the MSP's coordination and engagement efforts. Within the MSP, the position of national coordinator was specifically tasked to fulfill anti-trafficking responsibilities. The government did not convene the interdepartmental working group for combating trafficking in 2024. The government maintained its 2023-2025 NAP, and the MSP convened a working group and began collecting information to begin the process of developing a new NAP. The MSP worked with regional officials to develop and approve corresponding action plans at the regional level. In 2023, the MSP drafted a law to provide medical, education, and other social support to Ukrainian children, including trafficking victims or children vulnerable to trafficking, who were forced by Russia into military activities; however, this law remained pending for the second consecutive reporting period. The government operated a hotline dedicated to trafficking and violence against women and children. In 2024, the government hotline staff identified or referred 136 potential trafficking victims to protection services. NGOs operated additional anti-trafficking and migrant advice hotlines, which identified and referred to services at least 90 potential trafficking victims. The OPG, in collaboration with partner organizations, continued to operate dedicated channels on social media platforms to prevent and detect child trafficking and a hotline to notify of human trafficking. Authorities, in coordination with NGOs, international organizations, and local partners, conducted awareness campaigns, available in Ukrainian and English, throughout the country focused on the risks of trafficking during the war for displaced persons and Ukrainians abroad, particularly at train stations and border crossings.

NPU and MIPOL continued to monitor and investigate formal and informal recruitment networks, including companies advertising jobs abroad, and worked with other stakeholders to raise awareness about known recruitment schemes. The Ministry of Economic Development and Trade oversaw the licensing of labor recruitment agencies and conducted regular and random inspections on their activities. In 2024, the State Labor Service (SLS) continued to conduct joint inspections with the NPU within the European Multidisciplinary Platform Against Criminal Threats (EMPACT) initiative. The government reported planned labor inspections remained suspended because of the conflict, while unplanned inspections were limited and did not include efforts to identify potential trafficking victims. SLS conducted 557 EMPACT inspections, which led to the identification of eight potential labor trafficking victims, including one child. NGOs previously reported there was an insufficient number of labor inspectors to effectively meet their mandate. Observers expressed concern about the lack of oversight of the labor market, with reports of workers not receiving payments, although the SLS continued awareness efforts and informal monitoring. The SLS published recommendations on its website for Ukrainians contemplating working abroad, including information on trafficking risks. The government did not make efforts to reduce the demand for commercial sex acts.

TRAFFICKING PROFILE:

Trafficking affects all communities. This section summarizes government and civil society reporting on the nature and scope of trafficking over the past five years. Human traffickers exploit domestic and foreign victims in Ukraine, and traffickers exploit victims from Ukraine abroad. Traffickers exploit Ukrainian victims in sex trafficking and forced labor in Ukraine, Russia, Poland, Germany, other parts of Europe, China, Kazakhstan, and the Middle East. Traffickers increasingly exploit Ukrainian victims in EU member states. Traffickers exploit Ukrainian children and vulnerable adults in forced begging. Child sex trafficking in Ukraine remains underreported, and reports indicate increasing attempts by criminals to establish online networks to exploit Ukrainian children internationally. NGOs estimate 10 to 15 percent of the Roma community lack identification documents, increasing their vulnerability to trafficking. Traffickers exploit victims in forced labor in Ukraine and abroad, including in the construction, manufacturing, and agriculture

sectors, and in forced criminality and forced begging. Traffickers force some victims to participate in the illegal production of counterfeit tobacco products, and well-established criminal groups force some Ukrainian victims to engage in other illegal activities abroad. Traffickers target low-skilled workers transiting Ukraine; increasingly, well-educated workers are vulnerable to labor exploitation. Traffickers increasingly use anonymized accounts to recruit and coerce potential victims online for sex trafficking or forced labor, including for forced criminality in fraudulent appropriation of social benefits. Children institutionalized in state-run orphanages, many of whom were evacuated abroad during the Russia-Ukraine war, are at especially high risk of trafficking. Officials of several state-run residential institutions have allegedly been complicit or willfully negligent in the sex and labor trafficking of girls and boys under their care.

IDPs, those living in Russia-controlled territory, and residents of Crimea face significant barriers to obtaining or renewing identification documents, increasing their vulnerability to trafficking. Widespread reports indicated Russian authorities confiscated Ukrainians' identification documents and forced adoption of Russian passports, increasing their vulnerability to trafficking. Observers reported Russia-led forces conscripted those living in eastern Ukraine to fight or engage in forced labor, such as clearing rubble or disposing of corpses. Residents of conflict-affected areas are at heightened risk of both labor and sex trafficking. Traffickers target IDPs and subjected some Ukrainians to forced labor, forced conscription, and sexual exploitation in Russia-controlled areas, including via kidnapping, torture, and extortion.

The Russia-Ukraine war forced 6.9 million people to flee Ukraine by January 2025 and displaced more than 3.6 million more within Ukraine. Most who initially fled the country were women and children, and more than half of Ukraine's children have been displaced. These refugee and displaced populations are especially vulnerable to human trafficking. In February 2022 and shortly thereafter, traffickers allegedly sought to exploit refugees at border crossings and transit centers. Media reported traffickers allegedly targeted displaced Ukrainians at the Polish border by offering them transportation or accommodations contingent upon domestic labor or commercial sex. Traffickers may use false claims victims could lose their temporary protection status to threaten them and prevent them from reporting exploitation to host country authorities. Some NGOs anticipate increased risks of trafficking as the economic impacts of the war continue. Experts note thousands of unaccompanied children, and children evacuated from at least 195 facilities, including those with disabilities, are at especially high risk of trafficking. Even for Ukrainians not displaced, the war and its economic impacts heighten vulnerability to trafficking. One 2022 survey found more than half of Ukrainians were at risk of exploitation, and willing to accept a risky job offer that could lead to exploitation; a follow-up survey in 2023 showed many groups, including men and educated Ukrainians, remained willing to accept risky job offers. Observers report Ukrainian women and girls are recruited for sex trafficking abroad. Online searches for "Ukrainian escorts" and other search terms related to the sexual exploitation of Ukrainian women and girls continue to increase. Traffickers target displaced Ukrainians via information posted online or on social media. Across Europe, Ukrainian refugees are at risk of exploitation in forced labor, including in domestic work, childcare, cleaning, hospitality, and agriculture. Since 2022, potential or confirmed trafficking victims from Ukraine have been identified across Europe, including in Albania, Bulgaria, Denmark, Estonia, France, Germany, Greece, Hungary, Italy, Ireland, Latvia, Lithuania, Moldova, the Netherlands, Poland, Romania, Serbia, Spain, Sweden, Switzerland, the United Kingdom, as well as countries outside of Europe, such as Panama, Argentina, and Israel. To date, authorities have identified only a few confirmed trafficking cases across Europe; experts observed language barriers, fear of reporting to foreign authorities, lack of awareness of available resources, and other factors could prevent victims from reporting trafficking crimes.

Russian forces forcibly transferred as many as 1.6 million Ukrainians – including thousands of children, elderly persons, and persons with disabilities – to Russia, Belarus, and Russia-controlled territories of Ukraine, including many to remote areas; these populations remain highly vulnerable to trafficking. Multiple sources report Russian authorities forced Ukrainian civilians to work on the front lines, and Russia-led forces in Russia-controlled territories in Ukraine forced prisoners from Ukrainian prisons to renovate the premises and build defensive fortifications, often under the threat of violence. Reports indicate Russian authorities, middlemen, private military companies, or Russia-affiliated forces coerced, used deception, and in some cases used force to recruit foreign

nationals, particularly South and Central Asian migrants, as well as citizens from Cuba and Syria to fight for Russia in Ukraine. Reports also allege Russian authorities recruited through force, fraud, or coercion Central Asians, including prisoners, to fight for Russia in Ukraine. Media consistently reported migrants are at risk of forced labor in Russia-controlled territory. An international organization reported Ukrainian armed forces recruited and used one child for intelligence gathering in 2022 and used one child at a military recruitment center in 2023. Past reports indicated Russia-led forces recruited and used children as soldiers, informants, and human shields. Media reports Russian authorities routinely prepare Ukrainian children for conscripted service in Russia's armed forces through military camps in Russia and Russia-controlled territories, increasing their vulnerability to trafficking. The recruitment of children by Russia-led forces took place in territory controlled by Russia and in areas where the Ukrainian government was unable to enforce national prohibitions against the recruitment or use of children in armed conflict.