



A FUNCTION OF RIGHTS, SOLIDARITY AND HUMANITARIAN AID

Vulnerability and risk factors to human trafficking among Ukrainian refugees in Bulgaria

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"I don't know about a pact between organized crime groups. I think [refugees] were very well-prepared and resilient when they arrived, but there was also huge support in [the Bulgarian] society. People literally did embrace them".

— governmental respondent after the interview.

"I think it was this combination of a swift policy response and humanitarian aid everywhere at EU level that really worked".

— respondent from international organization.

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1. Introduction

The full-scale military offensive launched by the Russian Federation against Ukraine in February 2022 confronted Europe with an unprecedented wave of refugees. With over 14 million persons forced to flee and seek refuge both in other less-affected regions within Ukraine and abroad, and as estimated by the IOM and UNHCR with over 6.1 million Ukrainian refugees displaced and still residing in other European countries as of 15 October 2024^{1,2} - this sudden, massive and unceasing for already over 2 years refugee crisis continues to pose major challenges for ensuring the security and safeguarding the rights of the conflict affected population.

One of the main concerns for international organizations and national frontline response structures alike was how to address the intensified vulnerability and protection risks of the people seeking refuge in Europe. Considering that already prior to the humanitarian crisis triggered by the Russian invasion in 2022 Ukraine was ranked among the European countries as a high risk source, transit and destination point for human trafficking³, experts and international organizations expressed strong and pertinent concern that the acute conflict situation and the resulting mass displacement will exponentially increase the risk of human trafficking activities in an already jeopardized environment.

The hereby analytical report is produced in the framework and to support the further execution of the project “Regional Response to Trafficking in Persons within the Ukraine Crisis”, funded by International Justice Mission and the United States Department of State Office to Monitor and Combat Trafficking in Persons. The analysis aims to provide a comprehensive outline of the vulnerability and risk factors for human trafficking of Ukrainian refugees in Bulgaria. By tracing out the current migration trends of Ukrainian refugees in Bulgaria, and assessing the formal and informal support and protection systems in place across the country, this research intends to point out the intersecting challenges, needs and shortages, as well as the functioning good practices and how the interdependence of those varying factors may add to the heightened vulnerability or in contrary may equip with resilience both the supportive structures and individual beneficiaries.

For the purposes of this analysis, we employ the operational definition of human trafficking as it is framed by the Office of the United Nations High Commissioner for Human Rights:

¹ UNHCR. 2024b. “Ukraine Refugee Situation.” <https://data.unhcr.org/en/situations/ukraine>. (Last accessed: 16.10.2024)

² International Organization for Migration. 2024. “UKRAINE & NEIGHBOURING COUNTRIES 2022-2024. 2 YEARS OF RESPONSE.” *International Organization for Migration*. Accessed July 6, 2024. https://www.iom.int/sites/g/files/tmzbdl486/files/documents/2024-02/iom_ukraine_neighbouring_countries_2022-2024_2_years_of_response.pdf.

³ Global Initiative against Transnational Organized Crime. 2021c. “Ukraine.” *GLOBAL ORGANIZED CRIME INDEX*. <https://ocindex.net/2021/country/ukraine>.

““Trafficking in persons” shall mean the recruitment, transportation, transfer, harboring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation. Exploitation shall include, at a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labor or services, slavery or practices similar to slavery, servitude or the removal of organs.”⁴

Since the notion of vulnerability emerged as a central entry point for the researched topic, in the course of the report we borrow the definition of vulnerability and particularly vulnerable migrants provided by the IOM. I.e. vulnerability

“can be understood to mean that some people are more susceptible to harm, relative to others, as a result of exposure to some form of risk. The type of harm to which they are more susceptible varies: it may be psychological, physical, environmental, etc. Risk factors depend on the type of harm being examined and may or may not overlap.”⁵

And in the case of the case migrants, refugees and asylum seekers vulnerable migrants characterize persons with migration background *“who are unable effectively to enjoy their human rights, are at increased risk of violations and abuse and who, accordingly, are entitled to call on a duty bearer’s heightened duty of care”⁶.*

Lastly, based on the thorough exploration of how and in what areas, individual and social vulnerabilities manifest among the Ukrainian refugee population in Bulgaria, and potentially how this affects people’s disposition to become the target of human trafficking, this report aims to propose recommendations for improving the effectiveness of prevention, identification, protection and support and integration measures targeting Ukrainian refugees in Bulgaria, and to contribute to the mechanisms implemented on a regional level. We have also looked at the often neglected areas of coordination and return, as these aspects emerged in the course of data collection.

⁴ UN General Assembly. 2000. “Protocol to Prevent, Suppress and Punish Trafficking in Persons Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime.” General Assembly resolution 55/25. *UNOHCHR*.

[https://www.ohchr.org/en/instruments-mechanisms/instruments/protocol-prevent-suppress-and-punish-trafficking-persons#:~:text=\(a\)%20%22Trafficking%20in%20persons,giving%20or%20receiving%20of%20payments](https://www.ohchr.org/en/instruments-mechanisms/instruments/protocol-prevent-suppress-and-punish-trafficking-persons#:~:text=(a)%20%22Trafficking%20in%20persons,giving%20or%20receiving%20of%20payments).

⁵ International Organization for Migration. 2019. “IOM Handbook on Protection and Assistance for Migrants Vulnerable to Violence, Exploitation and Abuse.” *International Organization for Migration*. PUB2019/002/R. <https://publications.iom.int/books/iom-handbook-migrants-vulnerable-violence-exploitation-and-abuse>.

⁶ Ibid.

2. Methodology

2.1 Research approach

The research adopts a mixed method approach with a leading component of qualitative methodology within the interpretative paradigm^{7,8}. This approach is particularly suited to exploring the complex and nuanced experiences of Ukrainian refugees in Bulgaria, especially in the context of vulnerabilities to trafficking which are located deep beneath the surface and are thus difficult to access. This paradigm emphasizes understanding the subjective meanings and lived experiences of participants, allowing for a rich, in-depth exploration of their perspectives⁹. Key to these processes is the researchers' reflexivity as a main tool in the field and in writing up^{10, 11}. Both the interviewees and the researchers are experts in the field to allow for an overview of the situation at the moment.

The analysis is guided by *Grounded theory*, a systematic methodology in the social sciences involving the inductive construction of theory through the analysis of data^{12, 13, 14, 15, 16}. Grounded theory is particularly valuable in this research, as it enables the development of theories that are deeply rooted in the empirical data gathered from participants. This approach allows for the emergence of patterns, themes, and concepts directly from the data, ensuring that the findings are closely aligned with the participants' lived realities. To answer the research questions in a rigorous and robust manner and to communicate effectively the rich data produced, the analysis was researcher-led and assessed and computer assisted using the paid versions of Atlas.ti and ChaptGPT 4.0. In presenting the findings, we have endeavored to tell a story within a narration that flows and makes sense and to present a coherent yet multifaceted

⁷ Cf. Garrick, John, and Carl Rhodes. 2000. *Research and Knowledge at Work: Perspectives, Case-studies and Innovative Strategies*. Psychology Press.

⁸ Cf. Denzin, Norman K., and Yvonna S. Lincoln. 1998. *The Landscape of Qualitative Research: Theories and Issues*. SAGE Publications, Incorporated.

⁹ Measor, L. 1985. "Interviewing: a strategy in qualitative research." In *Strategies of Qualitative Research: Qualitative Methods*, edited by R. G. Burgess, 46–77. London: Falmer Press.

¹⁰ See Barry, C., N. Britten, N. Barber, C. Bradley, and F. Stevenson. 1999. "Using reflexivity to optimise teamwork in qualitative research." *Qualitative Health Research* 9: 26–44.

¹¹ Russell, Glenda M., and Nancy H. Kelly. 2002. "Research as Interacting Dialogic Processes: Implications for Reflexivity." *DOAJ (DOAJ: Directory of Open Access Journals)*, September. <https://doaj.org/article/64fd74282c38461d9823c4e411231911>.

¹² Cf. Glaser, Barney G., and Anselm L. Strauss. 1967. *The Discovery of Grounded Theory: Strategies for Qualitative Research*. Transaction Publishers.

¹³ Ralph, Nicholas, Melanie Birks, and Ysanne Chapman. 2015. "The Methodological Dynamism of Grounded Theory." *International Journal of Qualitative Methods* 14 (4): 160940691561157. <https://doi.org/10.1177/1609406915611576>.

¹⁴ Glaser, Barney G. 1992. *Basics of Grounded Theory Analysis*. Mill Valley, CA: Sociology Press.

¹⁵ Glaser, Barney G. 2001. *The Grounded Theory Perspective I: Conceptualization Contrasted with Description*. Mill Valley, CA: Sociology Press.

¹⁶ Glaser, Barney G. 2003. *The Grounded Theory Perspective II: Description's Remodeling of Grounded Theory*. Mill Valley, CA: Sociology Press.

picture¹⁷.

Through this methodological framework, the research aims to generate a comprehensive understanding of the specific vulnerabilities and risk factors to trafficking faced by Ukrainian refugees in Bulgaria, and to provide actionable recommendations for strengthening the care systems despite that the explored phenomenon is hidden and extremely difficult to be unveiled.

2.2 Data collection methods

The selected combination of data collection methods is embedded in the process of stakeholders' triangulation, which ensures that the obtained data will be compared and confirmed with data of multiple sources representing different perspectives. This allows not only to outline the dominant trends and patterns, but also to pay attention to discrepancies and contradictions, which may otherwise remain unrecognized as rooted in systemic deficiencies, and potentially posing danger to the vulnerable population at large. The central data collection methods involve:

- Desk research - to review academic and non-academic literature, administrative data and surveys, and relevant reports of national intergovernmental bodies and local and international organizations, with mandate in Bulgaria and the region.
- Semi-structured interviews¹⁸ with key stakeholders, experts, frontline workers, and members of the Ukrainian community in Bulgaria - to identify specific case studies of exploitation and/or high risk to human trafficking, as well as to establish needs and good practices in prevention of human trafficking among refugees in Bulgaria. The choice of semi-structured interviews allows for flexibility in exploring topics of interest, while providing enough structure to ensure that key research objectives are addressed. Due to levels of verification and legitimation, some institutions preferred providing answers in writing. The research team conducted 20 interviews in total:
 - 2 with representatives of the international organizations in Bulgaria with mandate for refugees and stateless persons;
 - 3 in-depth interviews with experts from Bulgarian branches or sister organizations of international NGOs specializing in prevention of trafficking in persons, victim protection, and awareness raising;
 - 7 interviews with key institutional stakeholders with wide-ranging competencies and responsibilities, including reception of refugees and asylum seekers, and application of state policy of international protection, provision of social welfare

¹⁷ See for example: House, Ernest R. 1980. *Evaluating With Validity*. SAGE Publications, Inc.
Scott-Simmons, Diana, Jeanne Barker, and Nan Cherry. 2003. "Integrating Research and Story Writing."
The Reading Teacher 56 (8): 742–45. <https://www.jstor.org/stable/20205288>.

¹⁸ See annexed, an example of the semi-structured interview guide. All interview guides followed an identical structure, however there were specific questions tailored to the area of expertise of the respondent.

and child protection services, national counter-trafficking activities, as well as labor protection;

- 8 interviews (in several instances with multiple interview partners) with frontline workers from different organizations and foundations working on national and local levels. This respondent bracket included representatives of established organizations with an extensive track-record in humanitarian aid, legal aid and psychosocial support for refugees, and particularly refugee women, as well as grassroots initiatives and projects launched in response to the Ukraine Crisis and aiming to address the specific needs of the Ukrainian refugees. 10 out of the 12 interviewed frontline workers are themselves Ukrainians affected by the conflict, who thanks to their professional background or personal dispositions volunteered to help in the period of emergency or were driving forces of community-based mobilization. This provided for valuable insights, not only from the lines of organizations who continuously, in the course of two years, have been providing all kinds of support towards better integration of Ukrainian refugees, but also from within the Ukrainian community.

To prioritize the safety, wellbeing and security of the vulnerable members of the Ukrainian community in Bulgaria, we have opted for interviewing self-designated ‘spokespersons’ from the community, i.e. people with migration background, who lead NGOs, manage self-organized humanitarian aid networks, are employed as frontline workers or volunteer in projects supporting refugees.

All data collection was based on a thorough informed-consent procedure and documentation¹⁹. The following data analysis and interpretation is grounded in the respondents’ data. To prove the richness of perspectives and to highlight emerging patterns in the findings, the analysis refers to the anonymized interview sources, as they are listed in a separate section of references, under the encoded name of the interview as utilized by the researchers.

3. Context

In order to contextualize the vulnerabilities to human trafficking of Ukrainian refugees deriving from the particular challenges they are facing in Bulgaria, the convergence of two important factors must be taken into account. First, understand the changes in migration trends of Ukrainian refugees since the beginning of the war. Second, what was the policy response of Bulgarian institutions to the Ukrainian Crisis, both within the framework of the synchronized EU-wide mechanism and with focus on integration and protection of the refugee population. And lastly, highlight the general trafficking risks and the state of play of the functioning governmental

¹⁹ See annexed the information sheet provided to the stakeholders prior to the interview and informed-consent form.

systems for identification, prevention and protection of human trafficking victims. And lastly, highlight the general trafficking risks and the state of play of the functioning governmental systems for identification, prevention and protection of human trafficking victims.

3.1 Overview of the Ukraine Crisis in Bulgaria

According to the continuous reporting by the IOM and the UNHCR, Bulgaria has not been identified as a primary destination for the refugees fleeing the war in Ukraine, unlike other countries in Western or Central Europe. The UNHCR flash update report from August 2024 shows that Germany, Czech Republic and the neighboring Poland, Slovakia and Moldova remain the countries with the highest numbers of Ukrainian refugees²⁰. Nevertheless, since the very beginning of the war in February 2022 Bulgaria has been receiving a steady flow of Ukrainian refugees, many of whom enter the country through the northern border with Romania.

For the period February 2022 to September 2024, a total of 3,278,230 Ukrainians have entered Bulgaria. The daily updated fact sheet delivered by the UNHCR²¹, informs that as of October 16, 197,088 Ukrainian refugees have registered for temporary protection. In the beginning of the last quarter of 2024, approximately 68,000 Ukrainians are permanently residing in Bulgaria, this includes the 6,018 refugees who use the different accommodation options provided by the state. Furthermore, UNHCR reports that 2,579 Ukrainian refugees have received Bulgarian citizenship.

As an EU member state, Bulgaria is fully compliant with the EU Temporary Protection Directive, which - upon request - grants temporary protection documents to all Ukrainian refugees with a much simplified and prompt procedure. Most recently, on a European level, the Commission has decided to extend the effectiveness of the Temporary Protection Directive until 4 March 2026. Mirroring the resolution of the EU institutions, Bulgarian caretaker government issued a decision²² to extend the provision of temporary protection and to prolong the national program for humanitarian assistance for Ukrainian refugees until 31 December 2024. It must be noted that the ongoing political crisis in Bulgaria, which results in lack of stability in many sociopolitical domains, inevitably overflows into the efforts undertaken for supporting the Ukrainian community. While there is no evidence that the lasting political roulette impacts negatively the quality of the humanitarian aid and state-provided services available to the Ukrainian refugees, it is apparent that the inability to form stable regular government influences the pace and the period of coverage of all decisions regarding support for Ukrainian refugees, resulting in short-term decisions that require frequent renewals.

²⁰ UNHCR. 2024. "Ukraine Situation Flash Update." 72. *UNHCR*. <https://data.unhcr.org/en/documents/details/110868>. (Last accessed: 16.10.2024)

²¹ UNHCR. 2024b. "Ukraine Refugee Situation Bulgaria." Data set. *UNHCR*. <https://data.unhcr.org/en/situations/ukraine/location/10816>. (Last accessed: 16.10.2024)

²² Ministry of Interior. 2024. "Decision 554." <https://pris.government.bg/document/ffc98d1229decf163e544603c483cd5f>. (Last accessed: 16.10.2024)

3.2. Policy response in Bulgaria²³

3.2.1. Coordination at international and national levels

From the outset of the conflict, both national and European-level authorities have recognized the Ukrainian refugee population as being at high risk of human trafficking. There were well-founded concerns that Ukrainian refugees could rapidly fall prey to criminal networks that thrive in situations of mass vulnerability, as seen during the COVID-19 pandemic. This concern prompted the EU Anti-Trafficking Coordinator, who oversees a network of national rapporteurs, to convene joint meetings, including both EU member states and relevant neighboring non-EU countries, such as Moldova, recognizing the transnational nature of trafficking risks. This swift mobilization under the lead of the EU Anti-trafficking Coordinator resulted in the presentation of a Common Anti-trafficking Plan²⁴. The plan was tailored to the precedents raised by the Ukrainian Crisis and adapted to the concerns about the level of preparedness for identification, support and protection of human trafficking victims from Ukraine in the different member and non-EU member states engaged in the consultations and plan development. In this regard, one of the interlocutors pointed out that there were reasonable concerns about higher risks for refugees opting for countries with long-standing status as a country of origin for human trafficking and history of high levels of identified victims of trafficking in persons (which is true for both Bulgaria²⁵ and Romania²⁶) and added that soon after the introduction of the action the impact of the coordinated effort was visible as the majority of Ukrainians entering Bulgaria were already briefed and provided with materials about the risks of human trafficking²⁷.

At the national level, in early March 2022, the Bulgarian government established an interinstitutional crisis task force with 6 topical working groups under the Council of Ministers. Among other things, the crisis task force was responsible for the maintenance of a hotline and an official web portal²⁸ that offers consolidated information about all state-provided services and humanitarian aid, as well as practical advice and guidance, including information on questions related to risks of human trafficking. The need to effectively organize the response to the emergency prompted the Council of Ministers, on 10 March 2022, to adopt the resolution

²³ Some parts of the following section are based on the information provided by the state institutions participating in the study.

²⁴ Directorate-General for Migration and Home Affairs. 2022. “A Common Anti-Trafficking Plan to Address the Risks of Trafficking in Human Beings and Support Potential Victims Among Those Fleeing the War in Ukraine: Under the Lead of the EU Anti-trafficking Coordinator.”

https://home-affairs.ec.europa.eu/news/anti-trafficking-plan-protect-people-fleeing-war-ukraine-2022-05-11_en. (Last accessed: 16.10.2024)

²⁵ Global Initiative against Transnational Organized Crime. 2021a. “Bulgaria.” *GLOBAL ORGANIZED CRIME INDEX*. <https://ocindex.net/2021/country/bulgaria>. (Last accessed: 16.10.2024)

²⁶ Global Initiative against Transnational Organized Crime. 2021b. “Romania.” *GLOBAL ORGANIZED CRIME INDEX*. <https://ocindex.net/2021/country/romania>. (Last accessed: 16.10.2024)

²⁷ Interview DIG--JTIP--IN15. August 16, 2024. Online.

²⁸ Government information portal “Bulgaria for Ukraine”: <https://ukraine.gov.bg/> (Last accessed: 16.10.2024)

“Humanitarian Assistance Program for Persons Seeking Temporary Protection in the Republic of Bulgaria as a Result of the Hostilities in Ukraine”²⁹. In order to regulate better the provision of accommodation and humanitarian aid, this document was further developed into the “Program for humanitarian assistance to displaced persons from Ukraine with temporary protection in the Republic of Bulgaria”³⁰, which is in force since 20 May. At the time of research and interpretation of the data, the program of humanitarian assistance as the document together with the Temporary Protection Directive, continue to be the two main documents that frame the efforts directed to assist the Ukrainian refugees, and most importantly the provision of state-funded accommodation. To access accommodation under the program of humanitarian assistance, the refugees should register in the RRC Elhovo, which houses the registration center, distribution point to state-provided housing units, and the temporary accommodation center for refugees. While in the first months after the beginning of the conflict, private hotels and guest houses could also accommodate Ukrainian refugees and receive a refund from the state, currently, the available accommodation options are the recreational facilities of state and municipal institutions.

In coordination with the crisis task force, the National Commission for Combating Trafficking in Human Beings (NCCTHB) worked closely with local commissions, organizing a series of working meetings to identify the needs of refugees across different regions of the country. Expert groups, composed of representatives from various local and regional authorities, the UNHCR, and other stakeholders, were formed in key areas to streamline responses to emerging challenges.

It is noteworthy that this national crisis task force was discontinued in August 2022 following the dissolution of the government at the time after a vote of no confidence. This development exemplifies well the above-mentioned negative impact of the political instability in the country over the efforts to address the needs of Ukrainian refugees coming to Bulgaria in a coherent, long-term minded manner. Both the hotline and the web portal are still nominally functioning, however the only regular updates available are about extending the period of temporary protection and the governmental humanitarian program. One interlocutor commented that initially, the web portal was a valuable source of relevant and up-to-date information, from which not only the refugees, but also frontline workers and volunteers, benefited. To their disappointment, the lack of regular and detailed updates, as well as what can be read between the lines - more broadly lack of well-grounded unified strategy on a national level, requires the

²⁹ Council of Ministers. 2022. “Decision Nq145.”

https://www.tourism.government.bg/sites/tourism.government.bg/files/documents/2022-03/rms_145_-_za_odobryavane_na_programa_na_polzване_na_humanitarna_pomosht_za_lica_turseshti_vremenna_zakrila_v_republika_bulgariya_v_sledstvie_na_voennite_devstviya_v_republika_ukrayna.pdf. (Last accessed: 16.10.2024)

³⁰ Council of Ministers. 2022b. “Decision Nq317.”

<https://ukraine.gov.bg/wp-content/uploads/2022/05/%D0%9F%D1%80%D0%BE%D0%B3%D1%80%D0%B0%D0%BC%D0%B0-20.05.2022.pdf>. (Last accessed: 16.10.2024)

creation of compensatory portals and information channels coordinated by the different organizations and initiatives³¹.

Early on in the face of the sudden influx of people, the main risks were related to the access to secure modes of transportation to flee Ukraine and verified accommodation options in the host countries - both instances in which people are particularly vulnerable and are prone to making hasty decisions. Two interview partners, involved with the Bulgarian National Human Trafficking hotline, noted that in the first weeks after the beginning of the war, there were reports of suspicious or dubious situations. These involved transportation and housing, which began to surface, with most signals coming from frontline workers or volunteers³². For example, one such signal informed about a man providing housing exclusively to women between the ages of 25 and 35³³. Interlocutors across the board highlight the need for vigilance in screening and verifying the trustworthiness of seemingly generous offers of help, especially in the situation of sweeping solidarity, since it allows malicious individuals to abuse the urgency to their benefit, mimicking among legitimate and reliable efforts.

Zooming in onto the empirical data, respondents from the different organizational backgrounds incline to confirm the self-report provided by representatives of the Bulgarian authorities, namely that they responded quickly, identifying and addressing these issues through coordination between local, national, and international actors. While many of the initial reports were related to potential risks rather than proven instances of trafficking or exploitation according to law enforcement sources, several respondents emphasized in one way or another that the rapid response and collaboration between various organizations often helped mitigate some of the immediate threats faced by Ukrainian refugees - for example, those related to unaccompanied children and the coordination between child protection services and law-enforcement, including EU-wide, as well as availability of a direct link between NGOs and the National Commission for Combating Human Trafficking, and a provision of trained female officers in suspicious or sensitive cases concerning women. Respondents often emphasized that the ongoing vigilance and proactive measures at both national and European levels continue to be essential in preventing human trafficking and ensuring the safety of those fleeing the conflict.

3.2.2. Social assistance measures provided

The Agency for Social Assistance (ASA) reports about prompt and effective response to the first wave of Ukrainian refugees, focusing on identifying at-risk groups and providing support. The agency's territorial structures, particularly in critical areas near border crossings, such as Burgas, Varna, and Yambol, were heavily involved in the response. Nearly 40,000 Ukrainian citizens

³¹ Interview DIG--JTIP--IN10. July 31, 2024. Online.

³² Interview DIG--JTIP--IN14. August 14, 2024. Online.

³³ Interview DIG--JTIP--IN15. August 16, 2024. Online.

received vouchers for essential goods through the operational program for food and basic material assistance under the Fund for European Aid to the Most Deprived³⁴. In 2022, under the Social Assistance Law, one-off assistance for emergency health, educational, utility and other essential needs was granted, also without prior assessment, to over 47,000 individuals, amounting to over 16 million BGN. According to the data provided by ASA³⁵, by mid-2024, one-time assistance had been given to almost 52,000 Ukrainian refugees. This number includes humanitarian aid and cash assistance provided only by the government through ASA and with contribution from European funds. While the ASA does not specifically track Ukrainian trafficking victims, they are included in general trafficking victim support systems by default.

Social support for Ukrainian refugees is provided under Bulgarian legislation, including the Social Assistance Act and the Law on People with Disabilities. Refugees beneficiaries of temporary protection are entitled to the same social assistance as other citizens, including specialized services for vulnerable groups such as children and individuals with disabilities. The agency conducts regular staff training to improve the effectiveness of social systems and ensure victims of trafficking are properly supported. The ASA respondents note that in specific cases, social workers assess the risk of trafficking and refer victims to appropriate services:

The ASA administrates data on the monitored cases of children victims of trafficking in accordance with the Coordination mechanism for referral, care and protection of repatriated Bulgarian UAM³⁶. The cases of trafficked children are actively monitored by the SAD/CPD for a period of one year. At the discretion of the social worker, the monitoring period may be extended, depending on the specifics of the case. Statistics are collected every three months and the information is summarized at the central level and provided to the State Agency for Child Protection.³⁷

The agency's efforts align with broader European goals to facilitate refugee integration by promoting employment, reducing reliance on social assistance, and addressing social prejudice through education and cultural orientation programs.

3.2.3. State measures regarding the employment vulnerabilities and needs

³⁴ Operational food program:

<https://asp.government.bg/bg/operativna-programa-za-hrani/operativna-programa-za-hrani-2014-2020/> (Last accessed: 16.10.2024)

³⁵ Interview DIG--JTIP--IN20. July 19, 2024. Sofia.

³⁶ Agency for Social Assistance. 2005. "Coordination mechanism for referral, care and protection of repatriated Bulgarian UAM."

https://osservatoriointerventitratte.it/wp-content/uploads/2018/03/Coordination_mechanism_for_referral_care_and_protection_of_repatriated_Bulgarian_UAM_2.pdf. (Last accessed: 16.10.2024)

³⁷ Interview DIG--JTIP--IN20. July 19, 2024. Sofia.

As stipulated by the Temporary Protection Directive of the EU³⁸, beneficiaries of the temporary protection have the right to access to employment and are subjected to rules applicable to national labor market policies and general conditions of employment in the host country. In this regard, the Bulgarian government has implemented various measures aimed at addressing the employment vulnerabilities of Ukrainian refugees, with a focus on ensuring that they have access to the labor market and are protected from exploitation. These efforts are supported by key state agencies such as the General Labor Inspectorate and the State Employment Agency, which play crucial roles in enforcing labor rights and facilitating employment opportunities.

The General Labor Inspectorate has taken several proactive measures to address employment-related vulnerabilities among Ukrainian refugees. It established dedicated communication channels, including an email address and a phone line, to provide real-time assistance and address workplace issues faced by refugees.

In 2023, the Inspectorate offered over 2,000 consultations, of which 210 specifically to Ukrainian women - mainly concerning unpaid wages and employment contracts. The rest were provided to Bulgarian employers - on the employment and working conditions of Ukrainian nationals who are granted temporary protection status. To prevent labor exploitation, the Labor Inspectorate monitors employers to ensure compliance with labor laws, regularly inspecting workplaces to prevent undeclared employment and flagging violations when necessary. Awareness campaigns and materials have been distributed to inform refugees of their rights and how to avoid risky employment situations, while employers are required to report the hiring of refugees to the Inspectorate.

The National Employment Agency has also played a significant role in integrating Ukrainian refugees into the labor market. Refugees with temporary protection benefit from the same rights as Bulgarian citizens when registering for employment services, allowing them access to job listings, vocational training, and psychological support. The agency has reported that its mobile teams have conducted extensive visits to refugee accommodations, providing consultations to over 14,500 refugees.

In 2022-2023, the government launched "Solidarity" Project³⁹, which was implemented by the National Employment Agency under the 2014-2020 "Human Resources Development" Operational Program . The project aimed at encouraging employers by providing subsidies for

³⁸ The Council of the European Union. 2001. "Council Directive 2001/55/EC: on minimum standards for giving temporary protection in the event of a mass influx of displaced persons, and on measures promoting a balance of efforts between Member States in receiving such persons and bearing the consequences thereof." 32001L0055. <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32001L0055&qid=1648223587338>. (Last accessed: 16.10.2024)

³⁹ See the section on "Solidarity Project", available online at: <https://www.az.government.bg/pages/solidarnost/> (Last accessed: 16.10.2024)

those who provide employment opportunities to Ukrainian refugees. The government subsidy covered remuneration for the employed refugee based on the minimum wage for a period up to 6 months, funds for the remuneration of mentors who will support the recruited persons, as well as additional funds for integration and accommodation. The agency reports that within the "Solidarity" Project, nearly 4,000 refugees were offered short-term employment in sectors like hospitality and retail. Although the project has ended, the National Employment Agency states that it continues to prioritize Ukrainian refugees, providing training and aiming to prevent labor exploitation through close collaboration with other state agencies.

However, challenges persist. The interviews show that many Ukrainian refugees face language barriers, difficulties in recognizing their qualifications, and complications in accessing formal employment due to contract violations or reliance on informal work. While both agencies have implemented preventive measures against exploitation, there is still a significant risk of refugees falling into the informal labor market, particularly in largely isolated workplaces in sectors such as hospitality. Additionally, issues related to receiving banking services and the lack of follow-up to the "Solidarity" Project leave some refugees in vulnerable positions, financially and professionally.

In conclusion, while Bulgaria's policies have provided Ukrainian refugees with legal avenues to work and access support services, there are areas in need of further development. Addressing language barriers, improving qualification recognition, and enhancing protections against labor exploitation are essential, according to the majority of respondents, for the long-term integration of Ukrainian refugees into the workforce. Enhanced coordination between government agencies, non-governmental organizations, and employers, along with continued funding for integration programs, will be key to ensuring these refugees find stability in the Bulgarian labor market.

4. Research findings

4.1 Migration trends

The migration of Ukrainian refugees to Bulgaria since the onset of hostilities in Ukraine can be characterized by distinct phases with varied migratory intents and integration plans. Multiple interlocutors account that in the immediate aftermath of the war's outbreak, Bulgaria primarily served as a transit country. Most Ukrainians passing through or staying in Bulgaria did not intend to stay long-term. There was an agreement among all respondents that anticipating a swift resolution to the conflict, the majority of the arriving refugees envisaged that they will require humanitarian aid and assistance for no longer than 3–4 months, after which it will be safe to return to Ukraine⁴⁰. The first wave spans from the period immediately after the war broke out until roughly the beginning of 2023, during which Bulgaria was considered mainly a country of

⁴⁰ Interview DIG--JTIP--IN16. July 18, 2024. Plovdiv.

transit, with many Ukrainians heading towards the West. The respondents were in agreement that this initial wave saw minimal efforts on the side of the refugees towards integration, with few seeking to learn the language, enroll their children in local schools, or secure long-term employment and housing.

The respondents univocally observed that a more substantial, subsequent wave of migration occurred recently, noted for its increased numbers of arrivals, with many refugees coming to Bulgaria not only directly from the conflict affected and economically disadvantaged regions of southern Ukraine, but also after initially fleeing to other European countries. In the case of arrivals from Ukraine, several respondents observed that the decision to flee was prompted by the deteriorating conditions in these areas, not only in terms of physical and human security but also due to steadily shrinking labor opportunities⁴¹. In the meantime, cases of relocation within the EU occur in search of better prospects outlooks for long-term social and economic wellbeing for the individuals and their families. Respondents observed that some refugees who had initially moved to Western European countries found integration challenging due to stringent local policies, for example in Germany, and cultural and linguistic barriers, leading them to reconsider their options. Several respondents stipulated that Bulgaria became a more attractive destination due to perceived cultural and linguistic closeness, and the prospect of a relatively easy social and economic integration, both for adults and children:

*New people are arriving daily, 50/50 from Ukraine and from other countries in Europe. Why do people come back to Bulgaria? They have difficulties with the language, German, French or Finnish is harder to learn; they can't tolerate the climate; and it is much harder for them to culturally integrate. So, they reorient themselves to Bulgaria and especially to the bigger cities with larger, consolidated and better rooted Ukrainian diaspora. Most of the new arrivals already have friends who are comfortable in Bulgaria. In most cases, these people coming from other European countries have already changed their place of residence several times. Their initial migration was instinctive, but they are now moving and planning consciously. Those who are now coming from Ukraine do the same - they have very clear and focused intentions about what they want, where to stay, where to work.*⁴²

Other frontline interlocutors confirm this observation, adding also nuances about the change in their *refugee consciousness*. One interview partner made the parallel with Syrian refugees, “whose main goal traditionally is to obtain refugee status so that they can move to Germany and other Western European countries”⁴³ and add that many Ukrainians shared this West-ward vision of integration. However, they realized that their refugee situation is different and hence currently

⁴¹ Ibid.

⁴² Interview DIG--JTIP--IN12. August 1, 2024. Plovdiv.

⁴³ Interview DIG--JTIP--IN05. July 25, 2024. Plovdiv.

opt for countries that offer cultural closeness. In this regard, one of the interviewed institutional representatives added an interesting observation:

[...] they rather come from Romania, Germany, Poland at the moment, once the subsidized humanitarian support and state program there was discontinued, or the Ukrainian refugees are no longer eligible beneficiaries. While in Bulgaria under the current program [for state provided accommodation] administered by the Ministry of Tourism there are no restrictive criteria, except when the applicants work under a labor contract.⁴⁴

Whether the driving motivation is the perspective for better access to state support, or the prospect for overall better chances for integration and opportunities for security and development for all family members, such motives account for this significant shift among Ukrainians' aspirations and how they perceive their migration status according to the majority of the interview respondents.

They also reported that the prolonged nature of the conflict has necessitated a shift in the mindset of the refugees towards seeking more permanent resettlement solutions, with more families opting to integrate into Bulgarian society, particularly through the educational system for their children. Many research participants emphasize that currently both the incoming from Ukraine and those from Western European countries come prepared with knowledge for the conditions and requirements in Bulgaria. Frontline workers from the Ukrainian community clarify that many new arrivals attempt to make arrangements prior to their arrival to Bulgaria directly through personal acquaintances or by contacting Ukrainian-led organizations. This planning ahead includes getting acquainted with language learning opportunities, the procedure and requirement for enrolling children in schools, monitoring the housing and job markets - all of this indicates a readiness for long-term residence in Bulgaria.

This enhanced preparedness and adaptability upon arrival in Bulgaria is observed as a rather encouraging development. Many of these individuals already have acquaintances or contacts who have successfully settled in the country, providing them with valuable insights into local conditions and expectations. This prior knowledge enables them to make informed decisions regarding their settlement, employment opportunities, and integration processes. According to a respondent, working with the newly arriving:

"In most cases, they start learning Bulgarian in advance, send applications for enrolling their children in Bulgarian schools while still in Ukraine, and upon arrival, many of the initial problems are already solved. These people are also much more open to all kinds of

⁴⁴ Interview DIG--JTIP--IN20. July 19, 2024. Sofia.

work; they do not have elevated expectations despite previously having a high standard of living."⁴⁵

This proactive approach significantly reduces the challenges typically associated with resettlement. By taking steps such as learning the language and arranging their children's education beforehand, these refugees are better equipped to integrate smoothly into Bulgarian society. Their willingness to engage in various types of employment and their realistic expectations further facilitate their adaptation and contribute positively to the local economy and community cohesion.

However, this dichotomous narrative of the *now-prepared* Ukrainian refugees versus the *previously-unprepared and -uninformed* should be taken with a grain of salt, as it fleshes out the more overarching contradiction of the affluent, intelligent, and self-reliant Ukrainian refugee versus the vulnerable refugee in acute need, which was unconsciously brought forwards by many respondents. While these accounts outline a more positive outlook in the change of the migration trajectories of Ukrainians, many respondents register that alongside the “prepared” individual there is also a significant number of refugees, who cannot afford to plan ahead and make arrangements. This is especially true for the persons coming directly from the impoverished and conflict-stricken parts of Ukraine, whose choice to leave Ukraine is a necessity, rather than a pragmatic strategy for finding the best possible new long-term *home*. Some respondents also shared a concern that a growing number of vulnerable people who were reluctant to take the risks of migration are now seeing no choice but to flee as well⁴⁶. This means that the Bulgarian support system has to brace for such individuals, and to take measures to address their specific needs, including strained mental health conditions due to traumatic war experiences or existing previous conditions.

These trends underscore the complexity of the migratory patterns and the evolving needs of Ukrainian refugees in Bulgaria, requiring a flexible and responsive approach to their integration and support.

4.2 Vulnerabilities

Identifying vulnerabilities, and particularly what makes people vulnerable or more susceptible to human trafficking, also poses a challenge due to conflicting depiction of the socio-economic background and the available resources to the Ukrainians who have opted to stay in Bulgaria. Many respondents emphasized that the vulnerability of Ukrainian refugees is very similar to the vulnerability of the Bulgarian host population but exacerbated by trauma from the war and the stressors of migration and being a minority in a foreign country. At the same time, the emphasis

⁴⁵ Interview DIG--JTIP--IN12. August 1, 2024. Plovdiv.

⁴⁶ Interview DIG--JTIP--IN16. July 18, 2024. Plovdiv.

on vulnerability was intertwined with stories about the well-off refugees, which poses the above-mentioned contradiction.

The respondents overall told a story in which the initial profile of Ukrainian refugees during the first wave of migration to Bulgaria showcased a demographic largely perceived as less vulnerable to human trafficking: as one respondent puts it “Simply the profile of Ukrainian refugees is different from the profile of the trafficking victim: they are affluent, educated, coming in groups, checking on each other”⁴⁷. Predominantly affluent, these refugees often arrived with their families, including spouses and children, and according to another stakeholder were well-informed about human trafficking issues⁴⁸. This group is described as proactive in asserting their rights, moved in cohesive units that monitored each other’s welfare, and rapidly established their own non-governmental organizations to aid their community’s settlement and integration. However, vulnerabilities have evolved since 2022, marked by several concerning trends. Over time, the resilience of these early arrivals has been challenged by diminishing economic resources and social isolation, leading to increased engagement in high-risk behaviors. Instances of alcohol dependence⁴⁹, ⁵⁰, involvement in abusive intimate relationships⁵¹, ⁵², ⁵³, ⁵⁴ and reliance on precarious means of support such as dating applications⁵⁵, or dubious accommodation from strangers⁵⁶, ⁵⁷, ⁵⁸, ⁵⁹ have become more common. The financial desperation has also driven some to liquidate their assets in Ukraine under unfavorable conditions⁶⁰ or their assets are at risk due to bank loans⁶¹.

The subsequent waves of refugees, originating predominantly from Ukraine's poorer regions, arrived with significantly fewer resources—both material and psychological—and less awareness of trafficking risks. The interview partners from the State Refugee Agency, the NCCTHB and experts from non-governmental sector active in combating trafficking in human beings assure that they maintain the efforts for raising awareness. This includes providing informational materials about the perils of human trafficking, as well as guidelines for identification of potential victims and risk situations and where to signal about those, all adapted into Ukrainian and available in the registration and reception centers (RRC), in accommodation

⁴⁷ Interview DIG--JTIP--IN17. July 31, 2024. Sofia.

⁴⁸ Interview DIG--JTIP--IN03. July 19, 2024. Sofia.

⁴⁹ Ibid.

⁵⁰ Interview DIG--JTIP--IN09. July 9, 2024. Sofia.

⁵¹ Interview DIG--JTIP--IN01. July 17, 2024. Sofia.

⁵² Interview DIG--JTIP--IN08. July 24, 2024. Sofia.

⁵³ Interview DIG--JTIP--IN09. July 9, 2024. Sofia.

⁵⁴ Interview DIG--JTIP--IN13. August 21, 2024. Sofia.

⁵⁵ Interview DIG--JTIP--IN09. July 9, 2024. Sofia.

⁵⁶ Interview DIG--JTIP--IN01. July 17, 2024. Sofia.

⁵⁷ Interview DIG--JTIP--IN08. July 24, 2024. Sofia.

⁵⁸ Interview DIG--JTIP--IN10. July 31, 2024. Online.

⁵⁹ Interview DIG--JTIP--IN15. August 16, 2024. Online.

⁶⁰ Interview DIG--JTIP--IN17. July 31, 2024. Sofia.

⁶¹ Interview DIG--JTIP--IN12. August 1, 2024. Plovdiv.

provided by the state and in refugee community centers. Nevertheless, the remark about less awareness about the risks is alarming. Could it be that the reason for lesser awareness of human trafficking risks among the more vulnerable newly arriving individuals is resulting in part from the relief of national and international level that the initially projected human trafficking crisis with Ukrainian refugees has been averted?

These groups, having delayed migration due to deteriorating conditions at home, include a higher proportion of individuals with acute vulnerabilities, such as severe mental health issues, often aggravated by the traumatizing experience of war.

On the basis of this, we can roughly group the vulnerability factors in the following categories:

- *Economic challenges*

Access to secure employment with adequate remuneration remains a challenge for the majority of the refugees. Oftentimes, the state support, be it accommodation, financial aid or food vouchers, is insufficient, especially if one person is responsible for an entire household, including children, elderly and people with physical or mental handicaps. In addition, a significant concern involves outstanding loans remaining in Ukraine. Refugees are compelled to attend to these unpaid debts to prevent banks from seizing the limited assets they still own and have not been destroyed by the military hostilities. This financial burden adds to their stress and vulnerability, as they must navigate repaying debts from abroad while often lacking stable income and support networks to address their daily needs. The fear of losing their remaining property exacerbates their precarious situation and may encourage pursuit of informal, uncontracted and exploitative work relations, which in turn impact their ability to focus on integration efforts or seek necessary assistance.

- *Housing*

One of the most pressing issues for refugees is finding housing that aligns with their financial capabilities. Interlocutors from humanitarian aid organizations are ambivalent when it comes to the sufficiency of state provided accommodations. Some note that the state provided options are limited and typically available only in rural areas or in the periphery socio-economic centers, which in turn may result in complications when trying to secure a job (especially for working single mothers), childcare and schooling, or having access to healthcare⁶². Another one notes that, while for people in working age state provided accommodation is not a good option, on the contrary, the facilities at the seaside are very suitable and comfortable for elderly and persons with disabilities⁶³. In any case, respondents agree that the process of redirection to an accommodation facility often fails to adequately assess the individual and specific needs of different demographic groups, such as children, elderly, people with chronic conditions or people

⁶² Interview DIG--JTIP--IN05. July 25, 2024. Plovdiv.

⁶³ Interview DIG--JTIP--IN16. July 18, 2024. Plovdiv.

with disabilities. One respondent brings the example of the Rest and Recreation Centre "Zheleznichar" (located 13 km north of Varna, which belongs to Bulgarian Railways),

*"[it] houses many disadvantaged people and does not have social workers. We [volunteers] had a meeting there, and we told them [management of the center] that there are 150 people and only two women volunteers, who in no way can compensate for social workers. One woman is responsible for helping 50 people, while people from the ministry say you can't do that, one social worker should only work with 2-3. By law, you cannot do that. What support from the institutions? And we send diapers, hygiene products - they just cannot afford it. Also for medicines - we used to provide for the seriously ill, but we can't keep up with that."*⁶⁴

The ambivalence among respondents persists also in their retrospective assessment of the decision to initially host refugees in hotels and guest houses. While many agree that it was an adequate ad hoc measure, that benefitted both the Ukrainian refugees and the hospitality sector⁶⁵, some are skeptical that this created elevated expectations and increased the shock from the difficulty to rent privately⁶⁶. The state of the residential property market in Bulgaria makes private renting a financially risky and in many cases unaffordable endeavor.

- *Health*

There is room for improvement regarding the dissemination of information about health insurance and access to medical services. The main challenge is the complete lack of medical assessment upon registration in Bulgaria to inform appropriate housing placements and the provision of supplementary psychosocial and medical services. The fact that many refugees left Ukraine without their medical records, including people with disabilities and chronic illnesses and many children lack documentation of their vaccinations, additionally complicates access and provision of adequate medical treatment.

- *Language barrier*

The bracket of social vulnerabilities includes many elements, but notably language acquisition is among the key components of successful integration. There are several free of charge options available to Ukrainian refugees. Children enrolled in state or municipal schools have the right to take up additional Bulgarian language classes at school. Unemployed adults can sign up for a language course under the *Refugee Employment and Training Program of the National Employment Agency*⁶⁷. Some regional structures of Caritas and Bulgarian Red Cross also offer language courses for adults. Since the launch of the UNHCR-supported network of the Compass

⁶⁴ Interview DIG--JTIP--IN09. July 9, 2024. Sofia.

⁶⁵ Interview DIG--JTIP--IN10. July 31, 2024. Online.

⁶⁶ Interview DIG--JTIP--IN05. July 25, 2024. Plovdiv.

⁶⁷ See details about the Refugee Employment and Training Program:

<https://www.az.government.bg/pages/programa-za-zaetost-i-obuchenie-na-bejanci/> (Last accessed: 16.10.2024)

Refugee Community Centers⁶⁸ in April 2024, people of all ages have access to language courses in the 6 Compass Centers of the network, in Sofia, Dobrich, Varna, Burgas, Ruse, Plovdiv. In the framework of the Compass Centers Network, only Bulgarian Red Cross is mandated to provide language training. While the interviewed officials acknowledge that the language barrier is one of the main challenges for successful integration, they did not recognize governmental failure to provide sufficient language training programs. This highlights the existing discrepancy between institutional perceptions and the experiences of refugees and frontline workers. There are gaps in the coverage of the available Bulgarian language courses:

“Language learning at first glance seems like an area of great success, but it proves not to be. If you ask the centers or the Bulgarian Red Cross, who has the mandate to offer the courses, the program is very successful; if you ask the people who go to these courses - also. The ones who don't access language training, though, no one is asking them. With my colleagues from the Sunday School for Bessarabian Bulgarians, we announced an online Bulgarian course and immediately over 300 people responded - this shows that the available programs are far from enough.”⁶⁹

“In Sofia, there is a shortage of opportunities to learn Bulgarian. There are not enough places in the courses offered by BRC. People want to learn offline and with a teacher, instead what they are offered are online courses. Additionally, the elderly do not have money for a language course, and single mothers do not have the time. Yes, there are more and more new options, but they are all paid.”⁷⁰

An important finding is that with regard to coverage, accessibility and effectiveness of the Bulgarian language courses there is stark regional difference. The above-cited positions are all from respondents working in Sofia and the region. At the same time, interlocutors from Plovdiv share a much more positive experience and are generally more satisfied with the scope of the language training. This observation adds to the narrative that surfaced in the empirical data that the consolidation of the Ukrainian community-led “Ukraine Support and Renovation” Foundation has impact over the delivery of a variety of services, including language learning. But returning to the state of play on national level, it is evident that the language acquisition programs should address barriers such as cost, accessibility and learning needs of vulnerable groups like single mothers, children and elderly.

⁶⁸ In collaboration with its national and local partners, UNHCR established a network of 6 Protection and Inclusion Centers for refugees of all nationalities and members of the host community: <https://www.unhcr.org/bg/17215-un-refugee-agency-launches-compass-network-of-refugee-community-centres-in-bulgaria.html>

⁶⁹ Interview DIG--JTIP--IN05. July 25, 2024. Plovdiv.

⁷⁰ Interview DIG--JTIP--IN13. August 21, 2024. Sofia.

- *Social dynamics*

Respondents have referred to a dynamics from solidarity to hostility and back in recent months. The early stages of the refugee influx were marked by substantial solidarity and public support toward Ukrainians in Bulgaria. However, between August 2022 and August 2023, there was a noticeable decline in support and tolerance from the host community - “*it was very difficult because of the propaganda talking points, the constant attacks from Vuzrazhadne and the attitudes they were spreading. Now, two and a half years later, many people understand that they have been misled by propaganda*”⁷¹. This period coincided with the rise of conservative and far-right parties with straightforward and pungent pro-Russian rhetoric, which incited moral panics leading to increased discrimination and hate speech against refugees. This waning tolerance heightened the risks for the refugees, particularly impacting their mental well-being and exacerbating their vulnerabilities to exploitation. While some respondents confirm that there are indicators for improving solidarity, e.g. in the schools environments attended by the children⁷², among employers⁷³ and based on the donations and material support received in the humanitarian centers, the overall situation in Bulgaria remains bleak. In the summer of 2024, Bulgarian society witnessed an unprecedented wave of anti-democratic and discriminatory rhetoric, which partially materialized in the social and legal world of Bulgarian society with the swift adoption of amendment of Law on Pre-school and School education, which bans the propaganda of ‘non-traditional sexual values’, colloquially known as the ‘anti-LGBTIQ+ law’⁷⁴. Amidst this, there is also a palpable rise of anti-migrant rhetoric, although notably directed mostly towards refugees and migrants coming from the Middle East. To what extent these developments and extreme populist narratives are heightened by yet another round of snap parliamentary elections, or is it a trend already more deeply-rooted in the Bulgarian social fabric, is hard to assess. In any case, the undercurrents of discriminatory and xenophobic attitudes and societal tensions must be taken into serious account. Although the empirical data gathered for this research does not indicate a direct threat to the Ukrainian community, this strained socio-political environment requires more targeted awareness raising, as well as more visibility of the (Ukrainian) refugees, in order to strip them from their *Otherness* flagged by conservative populist narratives.

⁷¹ Interview DIG--JTIP--IN12. August 1, 2024. Plovdiv.

⁷² Ibid.

⁷³ Interview with head of humanitarian aid organization. DIG--JTIP--IN16. July 18, 2024. Plovdiv.

⁷⁴ See coverage from August 16, 2024, in Politico:

<https://www.politico.eu/article/bulgaria-anti-lgbtq-law-ban-propaganda-school-ruman-rudev/> (Last accessed: 16.10.2024)

- *Use of social media and Internet*

Having in mind previous research by “Dignita”, which explores the risks of job search and particularly the perils of online job advertisements⁷⁵, one exchange with Ukrainian volunteers presented an opportunity to probe into what are common online behaviors among the community. They reported that although there are several well-known Facebook groups, Ukrainian refugees in Bulgaria predominantly utilize Telegram channels for exchanging information. This preference is attributed to the fact that Facebook is not widely used in Ukraine; hence, refugees continue to rely on platforms familiar to them, such as Telegram and Viber. Recognizing this trend, organizations working with refugees direct individuals to legitimate channels and groups where content is monitored to prevent the spread of false information:

We administrate a Telegram channel for the beneficiaries who are currently staying in the center and for those who receive other services. One day every week, the channel is open for paid publications, but we monitor what advertisement is published. The rest is open for communication between the members and to share important or useful information. Of course, sometimes, unverified messages or fake ads manage to slip in. We have several admins, but we don't manage to verify everything immediately, yet we try to check consistently.⁷⁶

The respondent indicated that this is a rather self-organized approach towards tackling the dissemination of trustworthy information. It is interesting that the UNHCR network of Compass Refugee Centers also opt for administrating Telegram channels, monitored by their employees⁷⁷. With hindsight to “Dignita”'s analysis of potentially unsafe job offers for Ukrainian refugees from mid-2023, which unveiled that the three major risk factors are discrepancy between job description and reality, including lacking information about the employer, which makes it harder to verify its legitimacy; lacking information about the application procedure or suspiciously simplified procedure; and lacking information about the nature of the employment contract, this research did not reveal any new data about possible perils of online job search. In fact, the majority of the interviewed frontline workers informed that their organizations are engaged in some form of employment support program and have experts who are in contact with verified employers. In addition, in many cases, they have designated caseworkers⁷⁸ who provide advice and consultations about work related questions, and for individuals who are not in their direct pool of beneficiaries or had recently arrived some organizations offer proactively info sessions to

⁷⁵ “Dignita” Foundation. 2023. “Study of Job Search Risks Among Ukrainian Refugees: Summer 2023.” <https://drive.google.com/file/d/1XKXwpoV23nRHBb9xGxmK4sEPVV6KXX4v/view>. (Last accessed: 16.10.2024)

⁷⁶ Exchange with several Ukrainian volunteers, DIG--JTIP--IN11. August 1, 2024. Plovdiv.

⁷⁷ Telegram channels of Compass centers in Burgas, Varna and Plovdiv: t.me/+Uy11AklhqDgxODOQ0, t.me/communitycentrevarna, t.me/Compass_Plovdiv (Last accessed: 16.10.2024)

⁷⁸ For example, in the network of Compass Centers, “Caritas” is mandated with the provision of social support and career guidance.

sensitize the refugees to the risks of work exploitation and equip them with some awareness to recognize incomplete or shady job ads.

- *Other factors*

In addition to the general vulnerabilities experienced by displaced populations - such as linguistic isolation, lack of familial or social support networks, limited awareness of local legal rights, and economic vulnerabilities - particular conditions within Bulgaria may further compound these vulnerabilities. For instance, Ukrainian refugees residing in remote or secluded areas, such as those accommodated in hotels funded by the state, might face increased risk of social and economic isolation. These locations can exacerbate segregation and restrict access to essential services and information, making refugees more susceptible to exploitation. Cases in hotels by the sea were cited, in which accommodated refugees were required to work in hospitality and repairs to pay off additionally for their state-funded accommodation: the respondent in interview DIG--JTIP--IN01 cited a case of a 75-y/o couple with “severe chronic illness, including a heart surgery and other serious health problems, incapacitated” who were placed in a known hotel chain and the owner required them to work more than 8 hours of hard physical labor to be eligible to stay within the government program and receive food and accommodation. The same respondent also cited the case of a woman in the same hotel with a child with Autistic Spectrum Disorder - she was requested to work as a maid with a very high target limit of rooms to clean and her child had to help and work alongside her. Instances of isolated accommodation can also cover private locations, though, as in the cases of an elderly woman with disabilities who experienced financial and other abuse by her daughter with no access to help⁷⁹.

Such settings often lack proper oversight and community integration, which can lead to increased opportunities for traffickers and others to exploit the vulnerabilities of isolated refugees. The physical and social isolation experienced in these environments underscores the need for targeted outreach and support services to ensure that all refugees, regardless of their living situation, are adequately protected from the risk of human trafficking. Instead, in one already cited above situation, volunteer social workers were actually banned from monitoring agencies because of violating the regulations for how many social workers can work with large numbers of vulnerable people⁸⁰.

Last, but not least, across the board, stakeholders underline that those among the Ukrainian refugees who are vulnerable face challenges and risks akin to those encountered by vulnerable Bulgarians. This includes difficulties in accessing support services, susceptibility to exploitation, and barriers to integration. The vulnerabilities within the Ukrainian refugee population mirror

⁷⁹ Interview DIG--JTIP--IN01.

⁸⁰ Interview DIG--JTIP--IN09.

those found in the local populace, indicating that systemic issues affecting vulnerable groups are not unique to refugees, but are part of broader societal challenges.

This underscores the importance of addressing not only refugee-specific vulnerabilities, but also the general conditions that contribute to the risks faced by all vulnerable individuals in Bulgaria. Enhancing support systems, ensuring equal access to services, and promoting inclusive policies are essential steps toward mitigating these risks for both refugees and the local vulnerable populations.

4.3 Risk groups

This evolving and dynamic landscape of vulnerability among Ukrainian refugees in Bulgaria underscores the critical need for continuous monitoring, targeted support services, and comprehensive integration strategies to mitigate the heightened risks of human trafficking. The ability to pinpoint specific risk groups among Ukrainian refugees in Bulgaria regarding human trafficking is significantly hindered by a dearth of formally reported cases. This lack of specific incident reports limits the capacity to establish clear trends or unique risk profiles different from those observed in other populations.

Our understanding, therefore, continues to rely on generalized knowledge of vulnerabilities associated with forced displacement and human trafficking cross-referenced with the migration experiences of Ukrainian refugees in Bulgaria:

- *Single mothers*

Due to the specific demographic dimension of the Ukrainian refugee crisis, women are especially susceptible to human trafficking and exploitative practices. Single mothers face escalated risks as they struggle to provide for their families amidst dwindling resources and limited employment opportunities. There is a concerning possibility that Ukrainian women may underreport incidents of exploitation and trafficking. This underreporting is attributed to the daunting prospect of having to prove victimhood in a foreign legal context, on the one hand, and a desire to avoid the stigma associated with reporting such incidents, on the other. Cultural stereotypes and prejudiced attitudes, which unfairly label Ukrainian women as merely objects of entertainment, further discourage these women from seeking help, thereby perpetuating their vulnerability to trafficking.

- *Unaccompanied and improperly documented children*

At the onset of the refugee influx, a significant number of children arrived in Bulgaria not only with incomplete documentation but sometimes traveling alone or accompanied by grandparents, or even by unrelated adults such as neighbors. This was often linked to the legal age for traveling

alone abroad, which in Ukraine is above 16. One respondent reported cases where an elderly woman traveled with several unrelated children without any documents authorizing temporary guardianship⁸¹. These individuals were permitted entry despite lacking the necessary authorization documents. This practice persisted during the initial month of the crisis. However, with the cooperation of the Ukrainian government, measures were implemented to address the issue. The Ukrainian authorities decreed that children could only leave the country if accompanied by an adult who possessed proper authorization (a power of attorney). This policy change effectively curtailed the earlier practice. While this measure eventually resolved the problem, it initially led to considerable confusion and uncertainty. During this period, there were instances where Ukrainian authorities requested assistance from Bulgarian counterparts to locate children who had left Ukraine under unclear circumstances. NCCTHB reports of several cases that required serious interinstitutional cooperation to track and monitor the travel trajectory of groups of unaccompanied minors⁸². The lack of proper documentation and oversight during the initial phase complicated efforts to ensure the safety and proper tracking of these unaccompanied or improperly documented minors.

- *Elderly*

Elderly refugees and those with chronic illnesses or disabilities often receive insufficient support, making them susceptible to various forms of abuse, including exploitation by relatives or through exploitative labor conditions. They experience severe economic precarity since often they are forced to rely solely on their Ukrainian pension. It is harder for them to learn Bulgarian, and there are less accessible language learning programs adapted for elderly learners, which additionally increases their opportunities to find legal work options.

- *People with mental health issues*

Notably, there have been recorded instances of sexual exploitation among those with longstanding mental health challenges (two such cases were cited as examples independently by two respondents from each other). This group of people often face difficulties in securing stable living conditions and are frequently on the move across national borders.

- *Ukrainian men subject to conscription*

The issue of Ukrainian men obligated to military conscription presents a complex challenge, affecting both those within Ukraine and those who have arrived in Bulgaria or other European countries. The implications of compulsory conscription for men reaching conscription age or who left Ukraine shortly after the conflict began are multifaceted. A significant issue faced by these men is the difficulty in obtaining or renewing essential personal documents. While

⁸¹ Interview DIG--JTIP--IN10. July 31, 2024. Online.

⁸² Interview DIG--JTIP--IN15. August 16, 2024. Online.

Ukrainian men can theoretically register in the military reserve online, many avoid doing so to prevent increasing their risk of mobilization. Consequently, those who lack valid passports or identification documents are rendered legally invisible, limiting their access to healthcare, legal protection, and other essential services. Without proper documentation, they are unable to open bank accounts or secure formal employment contracts, hindering their financial stability and integration into Bulgarian society. Examples include Ukrainian sailors working in Bulgaria who cannot renew their international passports, and young men wishing to marry Bulgarian citizens who are unable to obtain certificates of marital status from Ukrainian authorities due to refusals by the embassy. The burden of psychological stress from the constant fear of conscription and legal uncertainties should not be neglected, as it contributes to mental health strains, affecting their well-being and that of their families.

- *Ukrainian ethnic and sexual minorities*

There have been reports indicating the presence of individuals of Roma ethnicity with Ukrainian citizenship, including minors, who may be at risk:

“Another thing: the Ukrainian Roma. Many such people came from there who also had a problem with documents and were at all kinds of risk and were not welcomed “warmly” by the states. I have worked with one such family, but [in Bulgaria] not much is said and the issue is not worked on accordingly. However, there is a Polish organization that mainly deals with Ukrainian Roma and the difficulties they face in integrating in Poland and works with Bulgarian organizations. Her [the founder's] sister is an artist, she makes panels about Roma life and collects biographical interviews of Ukrainian Roma. She also made a film about them.”⁸³

The comment suggests that some members of the Ukrainian Roma community are present in Bulgaria and could be vulnerable to exploitation due to factors such as social marginalization, discrimination, and economic hardship. While, in theory, specific minority groups such as Ukrainian Roma, the LGBTIQ+ community, and others might face heightened risks of human trafficking, there is insufficient evidence from this research to substantiate these concerns fully. Awareness of less favorable conditions in Bulgaria, including potential discrimination and lack of tailored support services, has potentially led many individuals from these risk groups to seek refuge in more accommodating Western European countries⁸⁴. This migration pattern may contribute to their lower visibility within Bulgaria and the scarcity of data regarding their experiences and risks.

⁸³ Interview DIG--JTIP--IN17. July 31, 2024. Sofia.

⁸⁴ Ibid.

The absence of substantial data may mean that there are no problems with such groups in Bulgaria, but it also may indicate a necessity for vigilant monitoring and targeted outreach to ensure that all vulnerable populations, including minority groups such as the Ukrainian Roma and the LGBTIQ+ community, are identified and provided with appropriate protection and support services. Enhancing data collection through further independent and/or stakeholder-led research and fostering trust within such communities are critical steps toward mitigating the risks of human trafficking and ensuring that no at-risk groups are overlooked.

Respondents have indicated that Ukrainian refugees face many of the same risks as the local Bulgarian population, particularly regarding labor exploitation and breaches of labor legislation related to human trafficking. These risks are compounded significantly by the added burdens of war-related stress and the complexities of migration. A notable factor influencing this vulnerability is that some Ukrainians are reportedly accustomed to working without formal contracts. They may prefer to accept exploitation or engage in the informal (gray) economy to supplement their income with state assistance, recognizing that state aid alone is insufficient to meet their needs. This economic necessity leads to a reluctance among victims to report instances of exploitation or trafficking, as doing so might jeopardize their livelihood and access to both employment and assistance.

4.4. Trafficking or exploitative practices: the gray area in definitions/identification

The majority of interviewed stakeholders, most notably international organizations and governmental respondents, were confident that the combination of policy response and humanitarian aid have been the cause of missing instances of human trafficking among Ukrainian refugees. Key informants in the Ukrainian community in Bulgaria have also stated “they have not heard of such cases”. This swift response of the EU to the Ukraine refugee crisis has been cited as evidence of how the best way to prevent human trafficking is by granting rights and overall implementing rights-based approaches to migration and labor⁸⁵. It has to be taken into account however that some civil society actors, including representatives of two Ukrainian NGOs, have suggested that the lack of documented cases (with a few exceptions to actually existing cases in their practice) may be due to drifts and gaps in the implementation of the protocols within the framework of the National Referral and Support of Trafficked Persons Mechanism in Bulgaria (NRM)⁸⁶. The available data in this study also detects some discrepancy in the use of definitions, which leave a gray area whether cases may actually qualify as human trafficking. This section therefore deals with some potential connotations of related concepts that arise from the interview data.

⁸⁵ Mendel, Jonathan, and Kiril Sharapov. 2024. “Re-politicising Anti-Trafficking: Migration, Labour, and the War in Ukraine.” *Anti-Trafficking Review*, no. 22 (April): 52–73. <https://doi.org/10.14197/atr.201224224>. (Last accessed: 24.10.2024)

⁸⁶ See for more information the NRM platform: <https://nrm.bg/en/national-mechanism/> (Last accessed: 24.10.2024)

4.4.1 Labor exploitation and breaches of labor legislation

Ukrainian refugees in Bulgaria face significant risks of labor exploitation and breaches of labor legislation. Common issues include the absence of formal employment contracts, underpayment or non-payment of wages that can qualify as deceit, and forced labor as in the case of requesting repair work from people with disabilities and children to justify state-funded accommodation in hotels, and coercion into unfavorable working conditions. These vulnerabilities are particularly pronounced among those residing in employer-provided accommodations, such as hotels, where refugees may be compelled to work in exchange for shelter.

One concerning practice involves refugees being required to find their own replacements to “free themselves” from exploitative labor situations. For instance, exploited workers or their relatives might use social media groups to find a substitute worker^{87, 88}. This effectively transfers the burden to another vulnerable individual, perpetuating a cycle of exploitation, and also jeopardizes the trust within the Ukrainian community, which has proved itself to be a significant pillar of support.

Cases of labor exploitation have been reported in the hospitality sector, including instances where refugees perform multiple job roles without appropriate compensation. In one example, a woman working in a hotel declined to file a complaint despite the exploitative conditions because the arrangement provided her with shelter, food, proximity to her workplace, and the ability to care for her elderly mother and a child with mental health issues⁸⁹. This highlights how personal circumstances and pressing needs can force individuals to accept unfavorable employment conditions.

The prevalence of informal labor practices exacerbates these risks. Many Ukrainian refugees work without formal contracts, which not only increases their vulnerability to exploitation but also inhibits their ability to report abuses. It is important to highlight that according to the respondents, there might be different motives behind the decision to work without a contract. Some refugees prefer short-term or informal employment due to their intention to return to Ukraine. For others, working without a contract was commonplace already in Ukraine: *“many people accept work without a labor contract as this has been a widespread practice in Ukraine, and they do not find it problematic; this is particularly common with men working in construction; women without contract is a different story”*⁹⁰.

⁸⁷ Interview DIG--JTIP--IN14. August 14, 2024. Online.

⁸⁸ Interview DIG--JTIP--IN15. August 16, 2024. Online.

⁸⁹ Ibid.

⁹⁰ Interview DIG--JTIP--IN05. July 25, 2024. Plovdiv.

There is a third group, including also individuals with physical or mental disabilities, and often single-mothers and women from women-headed households, who opt for uncontracted work to maintain access to free accommodation. They fall victim of this vicious circle, because according to the program for temporary accommodation individuals who have a labor contract registered in the National Revenue Agency are no longer eligible for the humanitarian assistance and the state-provided accommodation. At the same time, the remuneration they receive from their uncontracted work is often insufficient to cover the costs of private renting, further entrenching their dependence on exploitative employers.

Non-governmental organizations, notably “Dignita”^{91, 92}, report that labor exploitation is one of the most common issues faced by Ukrainian refugees. Early in the crisis, several incidents involved human resource agencies that had operated in Ukraine prior to the war. These agencies offered employment contracts and accommodation but failed to specify that housing was provided only for the employee. Misled by these omissions, many refugees arrived with their families and were subsequently charged additional fees for their spouses and children, which were deducted directly from their salaries. The respondent reported that eventually there was no obstacle of terminating the contracts, but nonetheless caseworkers assisted the affected in filing complaints with the General Labor Inspectorate⁹³. The respondent added that based on their work of providing career guidance and consultations, they came across instances of employers abusing subsidy programs intended for refugee assistance. They cited a case, in which one employer found a way to register multiple, duplicating contracts for the same workers under the “Solidarity” Program. While the Ukrainian refugees were receiving their salary, the employer was pocketing duplicated subsidy from the state, exploiting the system for financial gain⁹⁴. These practices not only defraud support mechanisms but also contribute to the exploitation of refugees.

Overall, the combination of economic necessity, lack of formal employment protections, widespread labor breaches among also the general population and insufficient oversight creates an environment where labor exploitation can flourish.

4.4.2 Sexual exploitation

In exploring the issue of sexual exploitation among Ukrainian refugees, respondents indicate that individuals are more receptive to empowerment-focused information regarding their rights, particularly in the context of human trafficking for labor exploitation. By addressing labor

⁹¹ Dimitrova, K., and D. Dimitrova. 2022. “Human Trafficking Risks for Ukrainian Refugees in Europe.” *Dignita Foundation*. <https://drive.google.com/file/d/1Agz3qbeRUzZhORJsgvRB7N8DF5T14wRi/view>. (Last accessed: 16.10.2024)

⁹² “Dignita” Foundation. 2023. “Study of Job Search Risks Among Ukrainian Refugees: Summer 2023.” <https://drive.google.com/file/d/1XKXwpoV23nRHBb9xGxmK4sEPVV6KXX4v/view>. (Last accessed: 16.10.2024)

⁹³ Interview DIG--JTIP--IN16. July 18, 2024. Plovdiv.

⁹⁴ Ibid.

exploitation—an issue more openly discussed within the community—it becomes possible to introduce and thematize the subject of trafficking for sexual exploitation. This approach mirrors strategies employed in other relatively closed communities⁹⁵.

Furthermore, one respondent emphasized that based on their experiences with signals received to the hotline for human trafficking and their subsequent processing, we may draw some analogies between the Roma or other ethnic or migrant communities and the Ukrainian community⁹⁶. They describe the Ukrainian community to be somewhat insular, exhibiting a general distrust toward institutional authorities. This lack of trust is evident in their reluctance to report situations of exploitation or other high-risk circumstances. When asked why the topic of sexual exploitation is often avoided or not addressed, the respondent pointed out that it remains unclear whether societal stigma or other factors contribute to this silence. It is possible that there is a public stigma attached to Ukrainian women as sexualized objects, or that they themselves may normalize exploitative relationships and, therefore, do not self-identify as victims⁹⁷.

An illustrative case involves a signal received from members of the Ukrainian community about a woman who became a victim of sexual exploitation by the owner of the accommodation where she was housed under a national program. Although she received support and was advised by her community to file a report with the authorities, she chose not to do so, expressing a lack of trust in institutional responses.

Throughout the period from March 2022, there have been no formal reports of trafficking for sexual exploitation among Ukrainian refugees, with only one case identified as high-risk, where the woman was accommodated in a center for specialized support. There were two reported cases of women identified as victims of trafficking for sexual exploitation by NGOs, which seem to have not been identified as such officially. This absence of reported cases does not necessarily indicate the absence of exploitation, but may reflect underreporting due to distrust of authorities, fear of stigma, or normalization of such situations.

These findings underscore the need for culturally sensitive approaches that build trust within the Ukrainian refugee community. Empowerment strategies that focus on educating individuals about their rights related to labor exploitation can serve as an entry point to address the more stigmatized issue of sexual exploitation. By fostering a supportive environment and enhancing awareness, it may become possible to encourage reporting and provide necessary support to victims of sexual exploitation within this vulnerable population. Historically, sexual exploitation contains inner contradictions due to issues of consent that may lead to under-identification due to

⁹⁵ Interview DIG--JTIP--IN15. August 16, 2024. Online.

⁹⁶ With full acknowledgement of the intersecting, historical and long-lasting discrimination against the Roma community in Bulgaria, this parallel aims at underlining particular features of collective response under duress, and not to equate the experiences of Roma and Ukrainians per se.

⁹⁷ Interview DIG--JTIP--IN15. August 16, 2024. Online.

the thin line between voluntary sex work and human trafficking for the purposes of sexual exploitation.

4.4.3 Smuggling

There continue to be instances of illegal border crossings involving Ukrainian refugees. Frontline workers from one community center indicate that individuals are crossing the Ukrainian-Romanian border through forested areas. These crossings are generally undertaken for reasons of convenience rather than due to trafficking activities. Upon entering Romania, in most cases, the refugees voluntarily present themselves to the authorities. Once they are registered by the Romanian police, they are able to obtain temporary protection and proceed to reach Bulgaria or other countries legally.

This pattern suggests that while the crossings are technically unauthorized, the individuals involved are not being trafficked but are seeking more efficient routes to safety yet such instances may mislead the public that trafficking is indeed significantly present. Migrants' prompt self-reporting to authorities indicates a desire to regularize their status and comply with legal processes. Understanding these migration behaviors is important for tailoring border management and support services to ensure the safety and legal protection of refugees, while also maintaining border security.

4.5 Gaps in the response system

While some respondents point out to a good system evidenced allegedly by the lack of many documented cases of human trafficking, the systems in place for addressing the needs of Ukrainian refugees in Bulgaria reveal several significant gaps across various domains which we have analyzed based on the components of a functioning anti-trafficking system based on care and human rights.

4.5.1 Identification

A repeatedly occurring observation throughout interviews is that there is currently no routine screening process for human trafficking during the registration or support of refugees in Bulgaria: when people register for temporary protection they are not interviewed or asked any questions about their experiences and vulnerabilities⁹⁸. According to Interview DIG--JTIP--IN01, their organization has had identified several suspicious cases. If their official indicates risk based human trafficking indicators, they conduct deeper assessment, and thus she has grounds to state:

⁹⁸ In interview DIG--JTIP--IN03, the respondent says: "There is no proactive identification and this is very important".

“Incidents of trafficking for labor exploitation have occurred. In one such case, an alert was made to the Help-line of the National Commission, and a check was triggered while we continued providing support. Formal identification of this offense is off the charts difficult, and usually it glides along the so-called “edge” of rights violation. These people [in this case] didn't pass through that violated rights edge [i.e. were not identified as human trafficking victims due to insufficient evidence for breached rights]. Nonetheless, they chose to stay [in Bulgaria, without the additional support or services aimed at human trafficking victims], because also what the system provides them with upon direct identification, I don't actually know how to put it, that... further victimizes them”.

The respondent in interview DIG--JTIP--IN02 further elaborates that in their international agency, *“there are standard operating procedures and protocols, but these have not been implemented since 2017 and need to be updated, and there are very few specialists who can do this”.* She further points out: *“Especially with regard to refugees, the lack of capacity is a shortcoming in the system. Identification is a challenge, the chances of identifying victims of trafficking are not great - authorities have identified 6 from Ukraine and 1 from the Philippines. Bulgaria has no independent national reporter to report identified cases”.* Similarly, NGOs are concerned about being too intrusive and also do not ask about human trafficking risks and experience, as the respondent in interview DIG--JTIP--IN09 explains:

“We ask them if they have any problems - we cannot ask directly [about trafficking] because we [Ukrainians] have a difference in mentality, there is more distance. Sometimes Bulgarians ask us questions like age, how much you earn, those may not seem too intimate, but such questions we ask only to relatives and close [friends]. When we ask them, they start to get scared. There is always a psychologist who talks to them - monitors for indications of alcohol addiction, family violence and other risks. And only if there are more clues, she asks, but does this very carefully”.

This limits the ability to proactively identify and address trafficking cases.

Potential discrepancies between state and non-state actors in interpreting and adhering to best practices are also present in the data. When asked how the State Refugee Agency and territorial structures address the risk of trafficking, one respondent said: *“By no means at all. Since they don't have a conversation in detail, if the Ukrainian man or woman doesn't say he or she is a victim, they don't ask. The assumption is that they give a Ukrainian citizenship document and register. Pretty brief encounter.”*⁹⁹ Another example is when it comes to identifying victims of trafficking among sex workers during brothel raids, according to for example interview DIG--JTIP--IN03 *“It is rather that we know unofficially that many women by the seacoast are victims. The problem is that there is no proactive identification by the police in season - they*

⁹⁹ Interview DIG--JTIP--IN07. July 17, 2024. Sofia.

don't go into the clubs, they don't separate [the women] from the trafficker, they don't contact the commission, I don't know if there is any action at all." State officials however point out that identifying trafficking in brothels, not only by the sea, is actually the only reason for such raids and that the standard procedures require adhering to such principles. To date, however, no Ukrainian victims of trafficking for sexual exploitation have been identified.

Nevertheless, such comments raise concerns about inconsistent treatment and undermined efforts, especially in the light of another respondent saying: "We have often had women call the police, and they [official state officers] mock her, bully her that she was asking for it [victim blaming], and unfortunately this breeds silence."¹⁰⁰ The same respondent goes on to explain later on in the interview that:

"when we report to the police, the police do not take the situation seriously. I had the private phone number of one official and shared it with [affected women]. But when you go to the police it depends on who you come across and we don't get support everywhere. A big problem is that [the women] don't speak English or Bulgarian and can't call the police themselves. I had this case of a woman on the Black Sea coast: locked up, her IDs taken and thrown away and I had to call from Sofia and say "there is a battered woman, locked up, go and see there to rescue her". As if I am some sort of a crazy woman. There was another woman here, complicated problem with human trafficking as some man promised her something by the seacoast and then kept her in a brothel, drugs etc. Psychological problem - quite difficult, she was in an NGO, the consular was visiting to see her, but the woman was for a psychiatrist really".

In addition, it seems that from the viewpoint of NGOs and grassroots organizations, state officials sometimes seem to confuse trafficking, labor exploitation and smuggling, reflecting broader challenges in understanding the complexities of human trafficking, which hinder effective identification and response. While the question of definitions is wide and complex, an open discussion of these discrepancies would reveal that official and civil society actors operate under differing assumptions.

As stated by many respondents, training programs exist for police, social workers, and mediators, but their effectiveness remains unclear due to low numbers of detected crimes, no identified victims among third country nationals and low numbers of convicted traffickers. Usually, there is a lack of follow-up mechanisms to assess how well training is applied in practice. Despite widespread training, reporting and prosecution rates remain low, potentially highlighting the need for stronger accountability and more proactive efforts by authorities. It also occurred that volunteers who mobilized themselves in the first weeks of the conflict, and later on often themselves members of the Ukrainian community, proved to play a key role in identifying at-risk individuals. Predominantly, the volunteers lacked awareness on human trafficking issues

¹⁰⁰ Interview DIG--JTIP--IN08. July 24, 2024. Sofia.

and how to identify trafficking risks. In this regard, one of the most successful awareness raising campaign in the context of the Ukrainian crisis in Bulgaria was the targeted training of volunteers.¹⁰¹

We learned that initial reports of trafficking risks during the refugee influx mostly came from active citizens and those assisting refugees, with concerns over dubious offers of transportation and accommodation. The respondent in DIG--JTIP--IN01 stated "it all started with offers for transportation" and then other risks started to emerge as the refugee crisis unfolded. Another respondent also says:

“Initially, when the refugee crisis started - let's take Romania, where many of the Ukrainians pass through on their way to the UK. Immediately [the Romanian services] reacted, there were police checkpoints, guarding no one to approach a lone woman. And here [in Bulgaria] how many people disappeared - young women, young mothers with children? A lot of cars were coming to the border and taking women to bring them [somewhere safe], but we don't know how many women [didn't reach a safe destination]. While Romania had a special state transport organized.¹⁰²”

Regarding transportation, according to the note also from interview DIG--JTIP--IN08: *“Quite often there are (now there are not so many), there were in various social media groups ads for transport - “we are looking for a driver, salary of 1000 BGN per day, for the transport of migrants”*. The respondent narrated the story of a woman in her 50s who ended up in jail on such an ad, being caught up in a people smuggling scheme. Such instances are confirmed by interview DIG--JTIP--IN05 in which the respondent speaks about the circulation of job advertisements for drivers, with very high salaries, *“which attracted mostly young people or “illegals”, it was a question of transporting some contraband goods, but the cases were handed over and processed by the police”*. According to the respondent, some of the people involved knew that it was an illegal activity, but most of the young people did not even realize. Regarding transportation, the same respondent also points out that

“there are still cases of illegal border crossing, [our organization] has been informed of cases along the Ukrainian-Romanian border in the wooded areas. However, people cross there out of convenience, not because of traffic, and are immediately on their way, “surrendering” in Romania. Once they are registered with the police, they can now come to Bulgaria in a completely legal way”.

¹⁰¹ Interview DIG--JTIP--IN15. August 16, 2024. Online.

¹⁰² Interview DIG--JTIP--IN08. July 24, 2024. Sofia.

Many reports of such cases were anonymous, indicating a reluctance among vulnerable individuals to engage with authorities, possibly due to distrust, fear, or cultural barriers as discussed earlier. Further research is needed to understand why, if this is really the case, trafficking victims may be hesitant to report in order to develop strategies for building trust and encouraging more effective communication with authorities.

4.5.2. Prevention

Despite extensive efforts by various organizations to disseminate information on trafficking risks among Ukrainian refugees in Bulgaria, prevention initiatives reportedly have struggled to reach the most vulnerable individuals. One key barrier identified during interviews is the communication channels preferred by refugees, who predominantly use platforms like Telegram and Viber, which are less commonly used by local organizations. While legitimate channels and groups have been established to prevent the spread of false information, misinformation still circulates quickly, and not all content can be verified or removed promptly. Additionally, it was pointed out that the government's information portal, which initially served as a valuable resource, has not been consistently updated, creating gaps in reliable, centralized information. Various organizations have attempted to fill this void with their own portals, but the absence of a unified platform continues to undermine prevention efforts.

Cultural and community factors also contribute to the challenge. The Ukrainian community is generally distrustful of institutional authorities, which limits their engagement with official prevention initiatives. Sensitive topics like sexual exploitation are often stigmatized, leading to reluctance in reporting or seeking help. Instead, many refugees rely on their own grassroots organizations for support, creating a disconnect between official prevention campaigns and the community's trusted sources of information and support. Moreover, the interviews show that refugees' economic circumstances often push them to prioritize immediate survival over assessing potential risks, further diminishing the impact of preventive messages.

To improve the effectiveness of prevention efforts, strategies need to be tailored to the communication preferences and cultural norms of the Ukrainian refugee community. Engaging community leaders, using trusted platforms like Telegram, and ensuring culturally sensitive messaging can help bridge the gap. By fostering trust and consistent engagement with the community, organizations can enhance the reach and impact of trafficking prevention initiatives.

4.5.3 Protection

Several respondents have mentioned that for Ukrainian refugees, the insular nature of their community and the stigma surrounding trafficking, especially sexual exploitation, may contribute to their reluctance to seek assistance from official channels. Many victims may not even recognize themselves as such, due to normalized exploitative relationships or cultural

pressures. As a result, they are more likely to rely on informal networks for support, bypassing legal avenues altogether. The current protection framework, relying on victims to come forward, may not be effective in offering support to this vulnerable group.

4.5.4 Support and integration

Interviewees consistently have reported that Ukrainian refugees in Bulgaria face numerous challenges in accessing support and integration services, which often mirror those encountered by other vulnerable groups and even the Bulgarian population as a whole itself. Key barriers include language difficulties, limited access to employment, and issues with cultural integration, particularly for children in schools. However, the unique vulnerabilities of refugees, such as their transient status and lack of local networks, exacerbate these issues. The need for tailored support mechanisms is essential to address their specific challenges, including legal and regulatory barriers, housing, language acquisition, and information access.

A significant obstacle lies in the legislative gaps surrounding the status of temporary protection, as most Bulgarian laws only address humanitarian and international protection. This has required amendments to laws like the Higher Education Act to accommodate the Ukrainian refugee applicants, but other changes to social and health service laws are still pending due to the absence of a regular parliament. Interlocutors from the Ukrainian community are unanimous that there is an observable increase in the interest of Ukrainian refugees to apply for obtaining Bulgarian citizenship, especially among Bessarabian Bulgarians. Meanwhile, the process of obtaining Bulgarian citizenship is slow¹⁰³, ¹⁰⁴, and despite the convenience to access temporary protection more often it proves to be a less favorable status, limiting refugees' ability to settle permanently¹⁰⁵. Improving access to citizenship or permanent residence would greatly benefit many refugees, especially men and boys facing conscription in Ukraine¹⁰⁶. Additionally, one respondent flagged the emergence of a new type of fraudulent scheme that advertises in online channels used by the Ukrainian community a service that claims to arrange temporary residence for other European countries against an undisclosed fee: *“the scammers start texting with potential victims and once they figure out what their financial means are, they fix the price, it is a little bit like the phone scams.”*¹⁰⁷. The respondent assured that their admin team is proactively working to block out all sources of such deceptive offers, however they highlight that there are

¹⁰³ Interview DIG--JTIP--IN10. July 31, 2024. Online.

¹⁰⁴ UNHCR was already cited at the beginning of the report regarding the number of people who have received Bulgarian citizenship, amounts to 2,579. Regarding the number of applications it is difficult to find information, the closest available is a report from the Bulgarian Telegraph Agency, available online at: <https://www.bta.bg/bg/news/bulgaria/580758-nay-mnogo-prepiski-za-pridobivane-na-balgarsko-grazhdanstvo-za-20-23-g-sa-obrazu>. Here, however, it is not clear how many of the applications of Ukrainian citizens are from refugees with temporary protection, and the period is also different from the timeline of this research.

¹⁰⁵ Exchange with several Ukrainian volunteers, DIG--JTIP--IN11. August 1, 2024. Plovdiv.

¹⁰⁶ Ibid.

¹⁰⁷ Ibid.

people who would be prone to respond to such advertisements because of the precariousness of prolonged temporary protection.

Housing is another pressing concern, with many refugees struggling to find affordable accommodation. Free housing is limited and often inadequately addresses the needs of vulnerable groups like the elderly and disabled. Programs initiated by organizations like Caritas provide short-term housing solutions, but the systemic shortage of municipal housing adds to the challenge. Only a small percentage of Ukrainian refugees utilize state assistance, indicating that there is capacity to increase support. In terms of educational integration, language acquisition is critical, yet many refugees lack access to Bulgarian language programs, particularly offline courses. Efforts to improve communication and service access, while avoiding over-reliance on humanitarian aid, are key to fostering more effective integration and independence among the refugee population.

4.5.5 Coordination and cooperation

Coordination among various stakeholders has proven to be a critical element in addressing the needs of Ukrainian refugees in Bulgaria, especially concerning their identification, prevention of trafficking, and integration. In Bulgaria, the government quickly established a crisis task force under the Council of Ministers, albeit short-lived, including a hotline and an official portal offering advice and information on trafficking risks. The National Commission for Combating Trafficking in Human Beings collaborated with local commissions, holding multiple working meetings to address regional needs and develop tailored responses. Expert groups with diverse stakeholders, including the UNHCR, were formed in key locations to coordinate these efforts. There is, however, a notable split in the stakeholders' assessment of the effectiveness and impact of various initiatives, which highlights the need for clearer evaluation mechanisms and improved transparency in assessing the Commission's role.

Unity among organizations has been a positive outcome, with collaborative efforts helping to avoid duplication and maximize resources. In Plovdiv, for example, the "Second Home" initiative offers comprehensive support in one location, serving as both a community and reception center. Caritas Plovdiv has also developed strong relationships with local institutions, although some issues with the Social Assistance Agency have required legal intervention to secure refugees' rights. Nonetheless, Plovdiv serves as an example of how effective coordination between organizations and institutions can lead to a supportive environment for refugees. Positive feedback from stakeholders emphasizes the importance of collaboration, both within Bulgaria and across Europe, in addressing the complex challenges Ukrainian refugees face.

4.5.6 Return to Ukraine and repatriation support

An important aspect that emerged during the research, though not initially included in the research questions, concerns the return of Ukrainian refugees to their home country. Contrary to the popular anticipation that economic stability and access to secure employment will be the determining factor whether to stay in one or another foreign country or to return to Ukraine, one respondent highlighted the impact of lacking accessible housing opportunities. Based on their observations on the ground, they reported that many who have already returned to Ukraine did so, particularly due to the instability resulting from the inability to secure stable accommodation¹⁰⁸. Allegedly, this concerns individuals who would have to endure a comparable economic precarity, regardless if they stay in Bulgaria or return to Ukraine, in such cases, the choice is guided by the availability of personal property in Ukraine or the opportunity to rely on a familial network of support to find accommodation. This finding underscores the significance of providing stable housing as a foundational element for successful integration, as refugees who were unable to secure long-term accommodation found it difficult to remain in Bulgaria.

The process of returning to Ukraine is generally straightforward, with refugees needing only the necessary documentation. Most people are reportedly returning to areas without active military operations. However, recent updates to Ukraine's entry requirements now mandate valid biometric documents for re-entry, which poses challenges for individuals holding older, non-biometric passports¹⁰⁹. This change has the potential to hinder the return process for some refugees, particularly the elderly population, who tend to return after the conclusion of state accommodation programs in Bulgaria. This pattern highlights the vulnerability of older refugees, who may lack secure housing solutions both in Bulgaria and upon their return to Ukraine.

Policymakers among the respondents acknowledged that they had not previously considered the potential problems associated with the return of refugees to Ukraine. Reflecting on this issue, one such respondent recognizes the need to raise the issue so that the European Union framework is updated to address emerging risks and to better coordinate responses. The change in Ukraine's entry requirements has raised concerns that new challenges may arise for returning refugees, necessitating updated policies and support mechanisms at both national and EU levels to ensure a smooth and secure return process.

4.5.7 Key stakeholders in the anti-trafficking and refugee support system

The interviews and our reasoning show that key stakeholders in preventing human trafficking among Ukrainian refugees in Bulgaria include various groups playing essential roles in supporting and protecting the vulnerable population. Ukrainian community organizations and grassroots groups are trusted by the refugees and are often their first point of contact for

¹⁰⁸ Interview DIG--JTIP--IN10. July 31, 2024. Online.

¹⁰⁹ Ibid.

assistance. These organizations provide critical support, disseminate information, and offer services tailored to the community's cultural sensitivities. Additionally, Ukrainian legal and psychotherapeutic professionals, along with helplines, help refugees navigate complex issues like abuse, trauma, and exploitation.

State agencies, law enforcement, and local NGOs specializing in human trafficking also play vital roles in ensuring legal frameworks are adhered to and that prevention and response mechanisms are in place. The Ukrainian Embassy serves as an important link between refugees and Bulgarian authorities, offering consular and legal support. Furthermore, international organizations like UNHCR and IOM provide policy guidance. In worldwide good practices, medical professionals and healthcare institutions are often the first to recognize signs of trafficking among patients, provided they receive proper training. Finally, volunteers and humanitarian aid workers are key in identifying and reporting potential trafficking cases, offering material support, and enhancing the community's capacity to prevent exploitation.

5. Conclusions and recommendations

The findings of this report emphasize the crucial role of a coordinated, rights-based approach in addressing the vulnerability of Ukrainian refugees to human trafficking in Bulgaria. The combination of human, political, and labor rights, supported by humanitarian aid, has been instrumental in protecting refugees from exploitation and ultimately human trafficking. Swift policy responses, particularly guidance and frameworks from the EU, coupled with societal solidarity in Bulgaria, initially provided a strong protective environment for refugees. However, gaps in the legislative framework, particularly around temporary protection status and granting citizenship, have hindered access to certain services, exacerbating vulnerabilities in crucial areas such as housing and healthcare. The involvement of Ukrainian grassroots organizations, offering trusted and culturally competent support, further enhanced refugees' resilience, allowing them to access necessary resources and build autonomy.

Despite early societal solidarity, fluctuations in support over time have contributed to increased risks of various nature for refugees. Initial widespread support gradually waned, giving way to instances of discrimination and even hostility, particularly in the labor market. This decline in solidarity heightened refugees' vulnerability to trafficking and exploitation. The erosion of societal support underlined the fragility of protection for refugees and the critical need for ongoing efforts to maintain solidarity to prevent trafficking risks.

In conclusion, while significant progress was made through the coordination of rights, humanitarian aid, and community-based support, there remain gaps that leave refugees exposed. The absence of routine trafficking screening and inconsistent enforcement of best practices may have hindered the effective detection of trafficking cases. Greater transparency, accountability, and targeted efforts are needed to address these challenges and ensure that the rights and

protections granted to refugees are effectively upheld, fostering long-term resilience and integration into Bulgarian society.

The report therefore concludes with the following recommendations:

1. Integrate further the temporary protection status across different areas of the Bulgarian legislation, introduce more flexibility for refugees holding temporary protection to change it, and ease the granting of citizenship for those who want to rebuild their lives in Bulgaria: Legislative reforms are needed to include temporary protection within the broader framework of Bulgarian law, particularly in relation to social and healthcare services. Such changes would help ensure refugees have uninterrupted access to necessary services, reducing their vulnerability to exploitation.
2. Strengthen solidarity and anti-discrimination measures: As societal support fluctuates, there is a need for sustained public awareness campaigns to combat discrimination and xenophobia. Bulgarian society's initial embrace of Ukrainian refugees should be maintained through ongoing initiatives that promote inclusivity and support for vulnerable groups.
3. Improve coordination among stakeholders: A more integrated approach to coordination between government agencies, NGOs, and community groups is essential to prevent overlapping efforts and wasted resources. Developing a centralized framework for collaboration, particularly in relation to housing, employment, and healthcare, will strengthen the support system for refugees.
4. Implement routine trafficking screening and capacity building for frontline workers: The introduction of systematic screening processes for human trafficking at all points of refugee interaction would significantly enhance the early identification of trafficking risks. Additionally, ongoing training for frontline workers, volunteers, and community members should be followed by mechanisms that ensure the practical application of this training, with regular follow-up and accountability measures.
5. Tailor support for vulnerable groups: Specific attention should be given to isolated and vulnerable groups, such as the elderly and individuals with disabilities. Programs that address housing needs, healthcare access, and employment support must be tailored to their unique circumstances to ensure that they are not left behind in broader integration efforts.
6. Support grassroots organizations and community-led initiatives: Ukrainian grassroots organizations have been pivotal in supporting refugees and should receive more direct funding and capacity-building support. These organizations, deeply embedded in the community, have the trust and cultural knowledge necessary to provide effective assistance.

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List of Interviews

- Interview DIG--JTIP--IN09. July 9, 2024. Sofia.
- Interview DIG--JTIP--IN06. July 17, 2024. Online.
- Interview DIG--JTIP--IN07. July 17, 2024. Sofia.
- Interview DIG--JTIP--IN01. July 17, 2024. Sofia.
- Interview DIG--JTIP--IN16. July 18, 2024. Plovdiv.
- Interview DIG--JTIP--IN18. July 30, 2024. Written correspondence.
- Interview DIG--JTIP--IN03. July 19, 2024. Sofia.
- Interview DIG--JTIP--IN20. July 19, 2024. Sofia.
- Interview DIG--JTIP--IN19. July 19, 2024. Written correspondence.
- Interview DIG--JTIP--IN04. July 22, 2024. Sofia.
- Interview DIG--JTIP--IN08. July 24, 2024. Sofia.
- Interview DIG--JTIP--IN05. July 25, 2024. Plovdiv.
- Interview DIG--JTIP--IN10. July 31, 2024. Online.
- Interview DIG--JTIP--IN17. July 31, 2024. Sofia.
- Exchange with several Ukrainian volunteers, DIG--JTIP--IN11. August 1, 2024. Plovdiv.
- Interview DIG--JTIP--IN12. August 1, 2024. Plovdiv.

Interview DIG--JTIP--IN14. August 14, 2024. Online.

Interview DIG--JTIP--IN15. August 16, 2024. Online.

Interview DIG--JTIP--IN13. August 21, 2024. Sofia.

Interview DIG--JTIP--IN02. July 18, 2024. Online. Followed up by additional written information on July 29.

Annex 1

Q1: What main developments have you observed in the migration trajectories of Ukrainian refugees to, within, and from Bulgaria since the beginning of the Russian invasion? Which changes would you highlight as significant for the situation of Ukrainian refugees in Bulgaria?

Q2: What services do you provide to Ukrainian refugees in Bulgaria? How do these services address the risks and vulnerabilities of human trafficking?

Q3: Who are the primary risk groups for human trafficking among Ukrainian refugees in Bulgaria? Has there been a change in vulnerable groups and risk factors over the last year?

Q4: How do you proceed with cases of trafficking or suspected trafficking? How is trauma-oriented care integrated into your services for Ukrainian refugees?

Q5: At this stage, what are the most common problems with the integration of Ukrainian refugees in Bulgaria, and how can these impact their vulnerability to trafficking?

Q6: What efforts are being made to raise awareness on the risks of human trafficking among Ukrainian refugees and the local community? What additional awareness raising and capacity building initiatives would be useful?

Q7: What are the challenges in the identification of trafficking cases and in the investigation of traffickers who target Ukrainian refugees?

Q8: How do you assess your joint work with Bulgarian institutions in general in the context of the reception and integration of Ukrainian refugees in Bulgaria, and in particular on the implementation of policies to combat and protect from trafficking in human beings? How are Bulgarian institutions doing compared to regional partners?

Q9: What gaps and shortcomings in the systems for identification, prevention, protection, support and integration of refugees from Ukraine require immediate attention? To what extent are these gaps and problems specific to Bulgaria, and to what extent are these gaps in the EU's reception and integration plan for refugees from Ukraine?

Q10: What are the main challenges you face in your work with Ukrainian refugees? What additional resources or support do you currently need to improve your work with them, especially focusing on key themes such as prevention of human trafficking, victim protection and institutional capacity building?

Annex 2

Information sheet for stakeholder interviews

Project: J/TIP - Regional response to the trafficking crisis in Ukraine

Dear interlocutors,

We at the Dignita Foundation and the experts we have engaged to conduct the research, kindly invite you to participate in our research, which aims to improve the identification and protection of Ukrainian refugees in Bulgaria at risk of human trafficking. Your participation is essential for the success of the project and for the formulation of recommendations for better support and protection of these vulnerable groups.

Information about the research:

Research Objective:

- To assess the vulnerabilities and risk factors for human trafficking among Ukrainian refugees.
- To identify key risk groups and gaps in identification, prevention and protection systems.
- To help develop recommendations for improving the effectiveness of prevention, identification and protection measures.

Methods:

- Semi-structured interviews with key stakeholders and frontline workers.
- Review of academic and non-academic literature.
- Review of administrative data and surveys.

Interview duration:

- Interviews will last approximately 60 minutes.

Confidentiality:

- All data provided will be treated confidentially and will only be used for the purpose of the study.
- Data will be stored securely and accessible only to the research team in accordance with Bulgarian and European legislation.

Your participation:

- Your participation is completely voluntary, and you are free to withdraw at any point without providing a reason.
- Withdrawal from participation will not have any negative consequences for you.

Contact for more information about the study [*Contact of relevant person*]

Contact for more information about Dignita Foundation and this project [*Contact of relevant person*]

Data Protection Responsible Person [*Contact of relevant person*]

Declaration of informed consent

I, the undersigned, declare that I have been informed about the objectives, methods, duration and confidentiality of the data in relation to the study "J/TIP - Regional Response to Human Trafficking in the Context of the Crisis in Ukraine" conducted by the Dignita Foundation.

I hereby give my consent to participate in the research under the following conditions:

1. I understand that my participation is voluntary, and I may withdraw at any time without giving a reason and without negative consequences.
2. I understand that the information I provide will only be used for the purposes of this study and will be treated confidentially.
3. I agree to participate in a semi-structured interview that will last approximately 60 minutes.
4. I understand that all data will be stored securely and accessible only to the research team.

Signature:

Name:

Date: