

# Modern Slavery and Financial Exclusion: Exploring Crisis-Related Risks for Men

Advancing Gender-Transformative and Gender-Responsive Approaches in Financial Sector Anti-Slavery Protection Interventions

Executive Summary

By Angharad Smith, Leona Vaughn, Toni Cela, Louis HERN Marcelin, Margaret Ohia-Nowak, Charu Hogg, and Ronny Marty



### **About FAST and UNU-CPR**

Finance Against Slavery and Trafficking (FAST) is a multi-stakeholder initiative based at United Nations University Centre for Policy Research (UNU-CPR) that works to mobilize the financial sector against modern slavery and human trafficking. Through its alliance-building approach and grounding its work in evidence-based approaches and rigorous analysis, FAST provides tools and training to financial sector stakeholders to take meaningful, sustained action against modern slavery and human trafficking. UNU-CPR is an independent think tank within the UN system based in New York. It combines research excellence with deep knowledge of the multilateral system to generate innovative solutions to current and future global public policy challenges.

### **About All Survivors Project**

All Survivors Project (ASP) provides research to improve the global response to every survivor of sexual violence in situations of conflict and displacement. ASP documents cases of abuse against boys and men to supplement work on girls and women to support a global response that includes all victims and survivors of violence. ASP is an independent, international research organization working with individuals and organizations to strengthen communities by upholding the dignity of everyone.

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# Executive Summary

In December 2022 in their report *Global Humanitarian Crises and Conflicts Increase Human Trafficking Concerns*,<sup>1</sup> the Inter-Agency Coordination Group Against Trafficking in Persons (ICAT) called upon the financial sector to be more involved in humanitarian and other responses in crisis and conflict settings, and especially to enable financial access for affected populations as part of trafficking prevention and protection measures. This call also reinforced earlier appeals for ‘gender-sensitive’ approaches<sup>2</sup> to be implemented when assessing trafficking risks and needs in these contexts.<sup>3</sup>

Financial exclusion<sup>4</sup> and the experience of Conflict-Related Sexual Violence<sup>5</sup> (CRSV) are viewed as specific vulnerabilities and significant risk multipliers for experiencing forms of modern slavery<sup>6</sup> in conflict and crisis-affected settings.

Finance Against Slavery and Trafficking (FAST), an initiative at the United Nations University Centre for Policy Research (UNU-CPR), and All-Survivors Project (ASP), experts on CRSV, undertook a short qualitative research

study between March and September 2023 to develop insights into how international and national anti-trafficking protection policy and interventions in these situations can support intersectional, gender-sensitive assessments of men’s financial vulnerabilities to modern slavery and facilitate their safe access to financial services.

Men account for most victims of all reported violence worldwide, and in labour trafficking they also dominate figures.<sup>7</sup> Yet, this research indicated that during conflicts and crises, despite being potential modern slavery victims, men are often ‘unseen’ in protective efforts for both anti-trafficking and financial inclusion.<sup>8</sup> In practice, this is shown to be especially acute when they are disabled; refugees/displaced; migrants; homeless; of diverse sexual orientation, gender identity, expression and sex characteristics (SOGIESC);<sup>9</sup> Black; or from another racial minority group. The modern slavery risks to diverse men<sup>10</sup> in times of crisis and their financial vulnerabilities are largely unappreciated in data, practices, policy, and funding, even when they are pervasive.<sup>11</sup>

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<sup>1</sup> The Inter-Agency Coordination Group Against Trafficking in Persons (ICAT), *A World in Crisis: Global Humanitarian Crises and Conflicts Increase Human Trafficking Concerns – Call for Action* (ICAT, 2022). Available at: [https://icat.un.org/sites/g/files/tmzbd1461/files/publications/icat\\_call\\_to\\_action.pdf](https://icat.un.org/sites/g/files/tmzbd1461/files/publications/icat_call_to_action.pdf).

<sup>2</sup> Gender-sensitive approaches involve considering how policies, programmes, practices, and language can affect individuals differently based on their gender identity and expression.

<sup>3</sup> ICAT, “Trafficking in Persons in Humanitarian Crises,” *Issue 02* (ICAT, 2017); Global Protection Cluster, *An Introductory Guide to Anti-Trafficking Action in Internal Displacement Contexts* (Global Protection Cluster, 2020). Available at: <https://publications.iom.int/books/introductory-guide-anti-trafficking-action-internal-displacement-contexts-2020>.

<sup>4</sup> Exclusion from formal financial systems, such as banking, saving, and insurance.

<sup>5</sup> CRSV includes rape, sexual slavery, forced prostitution, forced pregnancy, forced abortion, enforced sterilization, forced marriage, and any other form of sexual violence. See: Office of the Special Representative of the Secretary-General on Sexual Violence in Conflict, *Conflict-Related Sexual Violence: Report of the United Nations Secretary-General* (United Nations, 2023). Available at: <https://www.un.org/sexualviolenceinconflict/wp-content/uploads/2023/07/SG-REPORT-2023SPREAD-1.pdf>.

<sup>6</sup> Modern slavery is an umbrella term which encompasses human trafficking, forced labour, child labour, forced marriage, sexual exploitation, criminal exploitation, wage theft, debt bondage, and other forms of labour exploitation/abuses.

<sup>7</sup> United Nations Office on Drugs and Crime (UNODC), Office of the United Nations High Commissioner for Human Rights (OHCHR) and United Nations Development Programme (UNDP), *Global Progress Report on Sustainable Development Goal 16 Indicators: A Wake-Up Call for Action on Peace, Justice, and Inclusion* (2023); International Labour Organisation (ILO) and Walk Free, *Global Estimates of Modern Slavery* (2022).

<sup>8</sup> Financial inclusion refers to the accessibility, availability, and usage of affordable financial services, including banking, credit, savings, insurance, and payment systems, to individuals and businesses, especially those traditionally excluded from formal financial systems due to social, economic, or geographical barriers.

<sup>9</sup> United Nations High Commissioner for Refugees (UNHCR), *SOGIESC and working with LGBTIQ+ persons in forced displacement, training package*. Available at: <https://www.unhcr.org/what-we-do/protect-human-rights/safeguarding-individuals/lgbtiq-persons/sogiesc-and-working-lgbtiq>.

<sup>10</sup> A term used in this report to refer to people who identify as men who are of different backgrounds, including men of diverse age groups, abilities/disabilities, racial or ethnic identities, nationalities or citizenship status, gender identities, gender expressions, sexual orientations, and religions.

<sup>11</sup> Angharad Smith and Leona Vaughn, “Preventing and Reducing Modern Slavery Risks for Diverse Men in Conflict and Crisis Through Increased Financial Inclusion,” *UNU-CPR Policy Brief* (New York: United Nations University, 2023). Available at: [https://collections.unu.edu/eserv/UNU:9281/diverse\\_men\\_conflict\\_crisis.pdf](https://collections.unu.edu/eserv/UNU:9281/diverse_men_conflict_crisis.pdf); Angharad Smith, Leona Vaughn, Toni Cela, Louis Herns Marcelin, Margaret Ohia-Nowak, Charu Hogg, and Ronny Marty, *Modern Slavery and Financial Exclusion: Exploring Crisis-Related Risks for Men* (New York: United Nations University, 2024). Available at: [https://collections.unu.edu/eserv/UNU:9414/diverse\\_men\\_crisis\\_risks.pdf](https://collections.unu.edu/eserv/UNU:9414/diverse_men_crisis_risks.pdf).

This Executive Summary of a longer research report is intended for the diverse audience involved in financial inclusion responses to crisis and conflict settings. This includes not only financial service providers, but also humanitarian organizations, civil society actors, UN agencies and other multilateral organizations, and government entities. Recommendations are provided to enhance efforts to combat modern slavery and promote financial inclusion, inclusive of diverse men, during times of crisis.

## Research Outline

The research process included a literature review, key stakeholder interviews with regional and international experts (11) actively involved in protection responses, and two case studies involving targeted semi-structured interviews with actors working in financial inclusion and civil society in Haiti (10) and Poland (10).

Haiti and Poland were chosen as case studies to explore how international policy and guidance were impacting national policy and local actors in their work to implement gender-responsive<sup>12</sup> actions for preventing modern slavery and financial exclusion. Haiti is experiencing protracted and serious environmental, social, and political crises, and specific civilian populations are particularly vulnerable to modern slavery, including human trafficking for forced labour, sexual abuse, and criminal exploitation.<sup>13</sup> In the last year, UN sanctions have targeted individual traffickers in Haiti, exploiting primarily young men for criminal exploitation (drug and gun trafficking).<sup>14</sup> Poland, at the time of research, had taken the largest number of refugees<sup>15</sup> fleeing the war across their border in Ukraine and implemented protective interventions, including financial inclusion, for displaced people. An increasing number of men fleeing Ukraine contacted trafficking helplines in the region during 2023, with 10 per cent of all trafficking enquiries relating to ‘foreigner difficulties in Ukraine.’<sup>16</sup>

These two case studies helped identify common themes in relation to this policy area and shape the report’s recommendations. However, the unique contexts of each

country cannot be understated and deeper exploration and understanding of these specific contexts is required when considering appropriate protection interventions.

## Research Findings

### Binary Vision

#### **Gendered Perceptions of Vulnerability to Trafficking and Other Forms of Modern Slavery**

The impact of gendered perceptions of vulnerability to trafficking and other forms of modern slavery during conflict and crisis settings are observed within this study of policy and practice. These perceptions risk framing men as only being potential perpetrators, minimizing their experience as victims. They also risk casting women solely as potential trafficking victims, especially for sexual exploitation. Overlooking the intersections of gender with various other identities, such as disability and age, combined with deep-seated gender biases and stereotypes about vulnerability, negatively impact all victims.

Neglecting the complexities of diverse identities will fail to address the unique vulnerabilities and needs of individuals vulnerable to exploitation, including financial vulnerabilities. Concerns are relayed in this study about the accurate identification of men who are victims of modern slavery and their limited access to essential assistance and protection services. It was observed that societal notions of masculinity and victimization led men from certain regions to not self-identify as victims, even when they meet the legal definition.

Further highlighted in the study is how discrimination against minority groups obstructs the accurate identification of victims who are men, especially those from diverse backgrounds. For instance, humanitarian responses in Poland were described in the study as exhibiting clear racial bias, and argued to result in discriminatory treatment of refugees who were African, Asian, and/or Muslim, especially young men. Similarly, Haitian interviews indicated that migrants encountered instances of racism in countries like the Dominican

<sup>12</sup> ‘Gender responsive’ is defined as an approach that goes beyond merely acknowledging gender differences; to actively incorporating these considerations into policies, programmes, and practices. It strives to promote gender equality and empowerment for individuals of all genders, including women, men, and non-binary individuals.

<sup>13</sup> “Living a Nightmare, Haiti needs an Urgent Rights-based Response to Escalating Crisis,” *Human Rights Watch*, 14 August 2023, <https://www.hrw.org/report/2023/08/14/living-nightmare/haiti-needs-urgent-rights-based-response-escalating-crisis>.

<sup>14</sup> “Security Council approves sanctions package for Haiti to quell gang violence,” *United Nations*, 21 October 2022, <https://news.un.org/en/story/2022/10/1129777>.

<sup>15</sup> “Ukraine Refugee Situation,” *UNHCR*, last accessed on 4 October 2023, <https://data.unhcr.org/en/situations/ukraine>.

<sup>16</sup> “National Hotline for the Prevention of Domestic Violence, Human Trafficking, and Gender Discrimination,” *La Strada Ukraine*, last accessed on 21 April 2024, <https://la-strada.org.ua/en/garyachi-liniyi>.

Republic and Brazil, which interviewees felt had prevented victims of abuse and exploitation from being treated as such.

### **Perceptions of 'Gender' in Anti-Slavery/Trafficking Policies for Conflict and Crisis Situations**

The study indicates a clear need to deepen awareness and understanding of gender in anti-slavery/trafficking policy and interventions for conflict and crisis settings, including funding strategies/donor priorities. Discussions of gender usually meant an exclusive focus on women and girls and rarely went beyond the binaries of biological sex to include diversity of gender identity and expression.

The literature review identified potential valuable insights to be gained for gender inclusive anti-slavery/anti-trafficking protection responses from the progress being made to integrate diverse gender identities and expressions into work on Gender-Based Violence (GBV) and CRSV. These insights may assist in developing gender-sensitive and gender-responsive protection policies and approaches to challenge harmful concepts of masculinity and promote inclusivity, without diverting attention and resources from women and girls.

Prioritizing women and children for protection from trafficking in international conventions and protocols was shown to influence national responses and agendas, including financial access efforts. A lack of awareness and inclusion of the unique risks and protection needs for different genders during crises is consequently reflected in the interviews and case studies. In Haiti, funders of anti-trafficking work were described as not including issues affecting men and boys vulnerable to exploitation. In Poland, conflict-related trafficking was broadly understood by civil society as a term only applied to women. Furthermore, gender-sensitive humanitarian policies were said to lack practical guidance, leading to perceptions of 'checkboxes' for securing Western donor funding rather than actionable guidance to help them protect people vulnerable to different types of risks due to their race or gender identity.

## **Missed Opportunities**

### **Lack of Integration of Anti-Slavery/Trafficking into Conflict and Crisis Protection Responses for Diverse Men**

The research found there to be limited integration of an anti-slavery and trafficking lens into conflict and crises protection responses for diverse men. The use of the term 'trafficking' in policies and responses, and how it was understood to be focused on women, may

restrict the effectiveness of interventions to protect men from modern slavery in conflict and crisis settings. The forms of exploitation reported to affect men of different backgrounds, including criminal exploitation (sometimes overlapping with sexual exploitation), forced labour, and labour trafficking, indicate that use of the broader term 'modern slavery' could support a more comprehensive protection approach.

### **Lack of Integration of Financial Access/Inclusion into Anti-Slavery/Trafficking Protection Responses**

It is evident that modern slavery and trafficking prevention policies would greatly benefit from a deeper understanding of the intricate connections between financial exclusion and the risks of modern slavery. This applies broadly and specifically in conflict and crisis situations. The increasing number of countries contemplating the integration of forcibly displaced persons into their National Financial Inclusion Strategies (NFIS) was a promising observation. Recognizing that these groups may be vulnerable to trafficking and exploitation would greatly enhance the effectiveness of these financial inclusion provisions. Integrating an anti-trafficking perspective in general into NFIS has the potential to promote economic development and identify and mitigate the financial vulnerabilities to trafficking experienced by communities. Furthermore, anti-trafficking/slavery policies should include a focus on financial inclusion which has the potential to reduce vulnerabilities to trafficking.

## **Knowledge Gaps**

### **Low Understanding of the Needs and Experiences of Diverse Men in Conflict and Crisis Settings Within the Financial, Humanitarian, and Anti-Slavery Sectors**

Significant knowledge gaps were shown to exist for all sectors on the needs and experiences of diverse men vulnerable to modern slavery, which create obstacles to addressing this challenge. Gaps in vulnerability monitoring data, intersectional knowledge about men's modern slavery experiences, and inclusive protection responses in these settings, were commonplace. To address these gaps, negative gendered notions of vulnerability and protection needs, in both policy and practice, must be overcome. Within this, intersectional identities should be acknowledged and addressed, especially for men of all ages, gender identity and expression, ethnicities, citizenship status, disabilities, and sexualities. This will be important to address the crucial need to understand the connection between financial vulnerability and modern slavery for diverse

men and integrate financial inclusion into protection responses in conflict and crisis situations. Increasing policy understanding of men's experiences will help to better identify and inform more comprehensive and inclusive needs-based protection responses for all.

The research did, however, observe an increasing acknowledgement in humanitarian and anti-slavery policy and practice that more needs to be known about the experiences and specific vulnerabilities of diverse men to modern slavery risks, especially in conflict and crisis settings. During key stakeholder and case study interviews, there were instances of initial surprise that men were the focus of the study, often followed by support for the need to address this area. Simultaneously, it was acknowledged that women experience greater vulnerability in these settings, which is why they have traditionally been the main focus of attention. The financial sector and financial inclusion actors more broadly were, however, significantly less sensitized to the role of financial access interventions to reduce modern slavery, especially for men.

## Conclusion

The research findings in the report indicate several issues behind the invisibility of men vulnerable to modern slavery in crisis and conflict settings.

The term 'trafficking' is employed more widely than 'modern slavery' in these settings and shown to be perceived in gender-specific ways. Primarily, it is perceived as being related to the sexual exploitation of women and girls. This has the potential to move all other forms of modern slavery outside of the purview of policymakers and protection interventions, even though conflict/crises are high-risk situations for various human rights abuses. By reducing the visibility of the different experiences of men and boys, especially those of diverse backgrounds, we may increase their vulnerability to

exploitation. The correlation between marginalization and being 'unseen' when a victim of crime or in need of support, is one which is commonplace for minority groups.

Notions of vulnerability are also problematically shown to be impacted by how gender is understood in binary and heteronormative ways. Gendered ideas of the victims who need or deserve protection permeate how vulnerability is understood within conflict and crisis risk policies and practices, for both anti-slavery and financial inclusion efforts. These have specific manifestations when filtered through notions of citizenship, race, religion, disability, and sexuality. Furthermore, because financial vulnerability to modern slavery is less understood in general, especially in relation to gender, this is shown to impact on whether financial access/inclusion responses are integrated within crisis/conflict modern slavery protection responses appropriately, or at all.

This exploration of the potential of protection interventions to assess financial vulnerabilities to trafficking and support financial access for diverse men in conflict and crisis settings has identified that the landscape is complex. As such, it requires a multi-faceted solution. Stakeholders need to build capability to recognize, assess, and reduce the distinct risks, especially financial vulnerabilities to different forms of modern slavery faced by individuals of diverse SOGIESC. Integral to this is an intersectionality lens – understanding that individuals may face multiple forms of discrimination and vulnerability simultaneously – which will enable stakeholders to build financial inclusion protection responses that address those specific needs. This will be crucial to developing an inclusive public-private partnership (PPP) humanitarian response for protection from slavery/trafficking, supporting the empowerment of people across all identities, and contributing to increased financial resilience within communities in their recovery from crises.

# Recommendations

Achieving Sustainable Development Goal Target 8.7 to eradicate modern slavery for all by 2030, when the world is experiencing increasing crises and conflicts, requires the mobilization of all actors, including the financial sector. This includes banks, investors, international Development Finance Institutions (DFIs), payment service providers, stock exchanges, and insurance service providers.

The following recommendations respond to the common issues identified by the overall research project: they are universal and not country specific. They also relate to protection from modern slavery, in recognition of the participant feedback that perhaps the existing term 'trafficking' was not capturing the experiences of diverse men in conflict and crisis settings. The intention is to shape a pathway towards an improved assessment of financial vulnerabilities to trafficking and other forms of modern slavery for diverse men in conflict and crisis settings, and develop appropriate financial access protection responses.

Recommendations for better understanding and responding to the needs of diverse men in conflict and crisis settings are outlined in two ways.

First, key recommendations are made which universally apply to all stakeholders, including governments, financial service providers, and humanitarian actors, that implement financial access/inclusion protection responses to protect against modern slavery in settings of conflict or crisis.

Second, the report outlines sector-specific recommendations tailored to financial sector actors, governments, UN agencies, and donors and funding organizations. We do not provide specific recommendations for civil society actors operating in conflict and crisis settings, given the significant challenges they face, including hostile environments and resource constraints. Instead, we advocate for a 'top-down' approach. This choice is rooted in our observation regarding the lack of international recognition of the vulnerability experienced by diverse men, which has influenced policy development and resource allocation. It is crucial that the aforementioned actors support and collaborate with civil society to ensure a successful response.

## General Recommendations

**Improve understanding of modern slavery in conflict/crisis settings:** To be able to address the specific and varied dynamics of conflict- and crisis-related exploitation, all actors need to improve their understanding of all the forms of modern slavery risks in these contexts. This may also help overcome the stereotypes of trafficking victims, often related to gender and migration.

**Expand notions of 'gender' in policy and practice:** Moving beyond traditional binary perspectives of gender rooted in biological sex will help foster a deeper understanding of the lived experiences of 'gender,' inclusive of all gender identities and expression. This expanded perspective is crucial to creating effective, needs-led anti-slavery and financial inclusion policies and responses which can meet the needs and identify the vulnerabilities of diverse men.<sup>17</sup> Valuable insights can be drawn from the progress made in addressing gender-based violence and conflict-related sexual violence to create more effective, gender-sensitive policies that support individuals with diverse gender identities.

**Review gendered notions of vulnerability to experiencing modern slavery, especially financial vulnerability:** To prevent modern slavery effectively, gendered notions of vulnerability and protection must be re-evaluated, with a focus on removing bias and addressing intersectional identities and experiences through gender-transformative approaches.<sup>18</sup> This should encompass all gender identities and expressions and consider different experiences related to factors such as age, ethnicity, citizenship status, disabilities, and sexual orientation. Vulnerability must also be evaluated at a structural level, with stakeholders giving due consideration to the multifaceted risks posed by a hostile social, legal, and policy environment, particularly when assessing the vulnerability of diverse individuals.

**Better integrate anti-slavery responses into conflict and crisis protection interventions:** Increasingly, a range of public and private actors are involved in humanitarian protection interventions following or during crises. These interventions should be fully inclusive of the range of modern slavery risks affecting different genders and enable different and gender-specific solutions to be created. This will involve gaining a better understanding

<sup>17</sup> Angharad Smith and Leona Vaughn, "Preventing and Reducing Modern Slavery Risks for Diverse Men in Conflict and Crisis Through Increased Financial Inclusion," *UNU-CPR Policy Brief* (New York: United Nations University, 2023).

<sup>18</sup> Gender Transformative approaches seek to challenge gender inequality by transforming harmful gender norms, roles, and relationships, while working towards redistributing power resources, and services more equally.



of the experience of different populations facing various vulnerabilities to exploitation. Gender dynamics, especially in labour trafficking, criminal exploitation, and sexual exploitation, should be considered, particularly when people are internally or forcibly displaced due to conflict or crisis. This has an additional dimension for pre-existing victims of cross-border trafficking/exploitation who may be displaced into a third country by conflict or crisis.

**Better integrate financial access and inclusion within anti-slavery/anti-trafficking protection policy:** Policy and guidance for preventing modern slavery, including human trafficking, would benefit from increased understanding of the interconnectedness of financial exclusion and modern slavery risks. The 2022 ICAT recommendations to engage the financial sector more actively in initial and long-term humanitarian and conflict/crisis responses, especially to enable financial access for affected populations, should be implemented. Furthermore, they should be extended to address all forms of modern slavery in ways that are gender responsive. Developing/emerging practice should be monitored for the most effective protection interventions for financial access and inclusion more broadly.

Understanding the impact of these protection responses will help identify effectiveness and any needs for policy/legislative change. By fostering stakeholder cooperation among government agencies, financial institutions, civil society organizations, and international actors, efforts can be coordinated and optimized to address the intersections of financial inclusion and trafficking effectively.

**Monitor and evaluate interventions to improve knowledge of gender and financial vulnerabilities to modern slavery:** Improved monitoring, data collection, and analysis of gender and other demographic characteristics will enable a better understanding of a) modern slavery risks for diverse men in conflict and crisis settings; b) their protection needs; and c) the impact and efficacy of policy interventions on these demographic groups. Collaborative, sector-specific, and cross-sectoral research, in addition to improving capabilities for intersectional risk data collection and analysis, will substantially enhance evidence-based protection policymaking and inclusive programmatic interventions.

## Key Sector-Specific Recommendations

### Financial Sector

- In line with the ICAT Recommendations, the financial sector should engage in humanitarian and other conflict/crisis responses, especially to enable gender-responsive financial access for affected populations (those on the move and those left behind) as part of prevention and protection measures regarding trafficking. This must also address cross-border issues for all forms of financial services, including banking, credit, loans, and payments/remittances.
- The sector should ensure the continued or improved ability to send and receive affordable and accessible remittances to/from the conflict-/crisis-affected country, as well as to/from the location of displacement, to increase the financial resilience of those vulnerable to slavery and exploitation. Lessons can be learned from existing cash transfer<sup>19</sup> and voucher assistance programmes,<sup>20</sup> which help address financial access, including the related issue of low literacy levels, and increase access to a full range of financial products.
- Adopt policies and practices to enable the sector to prevent and respond to modern slavery in crisis situations, and all other times, in a gender-sensitive way, including actions to:
  - Better identify crisis-related modern slavery risks and share this information appropriately. Financial sector transaction monitoring for financial flows which may be linked to modern slavery, especially if they can identify trends in victimization by gender and/or additional identities, are essential to effective partnership protection responses during crises. This may include identifying loans potentially utilized to pay 'recruitment fees' related to labour trafficking.<sup>21</sup>
  - Implement tiered Know Your Customer (KYC) and appropriate customer due diligence processes to provide wider access to basic accounts, and

<sup>19</sup> "Cash Transfers," *World Food Programme*, last accessed on 6 December 2023, <https://www.wfp.org/cash-transfers>.

<sup>20</sup> "The State of the World's Cash 2023. Chapter 6: Linkages with Social Protection," *CALP Network*, 15 November 2023, <https://www.calpnetwork.org/web-read/the-state-of-the-worlds-cash-2023-chapter-6-linkages-with-social-protection/>.

<sup>21</sup> UNODC, *The Role of Recruitment Fees and Abusive and Fraudulent Recruitment Practices of Recruitment Agencies in Trafficking in Persons* (Vienna: UNODC, 2023).

clear assessment and reporting mechanisms for situations where customers are suspected of being involved in modern slavery or are being exploited and need support.

- Financial regulators and supervisors should allow for experimentation and close monitoring of these policies and their impacts for people of different genders, within the form of a 'regulatory sandbox' to protect people from modern slavery, especially in response to crisis.
- Digital platforms to enhance the accessibility of financial services and streamline processes, particularly in crisis situations where physical access may be limited, should be explored. However, digital inclusion must also be addressed in partnership with other actors and safeguards, and consumer protection principles must be at the heart of these platforms.
- Embed intersectional gender analyses and employ human-centred design within financial inclusion programming to identify and address the unique vulnerabilities and challenges faced by individuals of different genders within the context of financial inclusion and anti-trafficking efforts. Collaborate with survivors and victims, and actively involve the civil society sector to ensure the accuracy of this analysis. See, for example, research by the Center for Financial Inclusion and the World Food Programme on cash transfers, women, and intimate partner violence.<sup>22</sup>
- Provide gender-inclusive financial services tailored to respond to the unique needs of individuals vulnerable to modern slavery in conflict and crisis situations, ensuring the availability of accessible, affordable, and secure financial services for individuals of all gender identities.
- Create monitoring and evaluation mechanisms to track the impact and efficacy of financial inclusion policies and initiatives to address conflict- and crisis-related vulnerability to modern slavery, using a gender-inclusive lens and including diverse men within the processes. Regularly review and update policy initiatives based on evidence and feedback from stakeholders, including modern slavery survivors of diverse genders to identify

and address *short term* impacts (e.g. evaluating unsuccessful applications for bank accounts may give valuable insights into the challenges diverse men may face when seeking financial services), and *long term* impacts (e.g. tracking the time it takes for individuals to reintegrate into stable financial situations, including post-conflict or post-crisis).

- Partner with civil society and humanitarian actors to promote financial inclusion and disseminate information about the benefits of financial services to individuals who may be at risk of modern slavery but have limited access to conventional platforms.
- Ensure the application of a gender-responsive lens to facilitate easier access to formal services, e.g. payment methods, for individuals currently working and undertaking financial transactions in the informal economy during crisis/conflict. This not only promotes needs-led responses to financial inclusion but also contributes to this vulnerable group's overall financial well-being and protection against exploitation. Promising practices include expanding access to secure money storage units and simplifying due diligence and KYC processes.<sup>23</sup>

## Governments

The following section offers recommendations for governments, applicable to both receiving and origin countries. States should proactively prepare for the increasing frequency of crisis situations, ensuring the resilience of their social protection systems and their seamless integration with other policies, such as disaster preparedness. In both scenarios – receiving and origin – policies should be driven by data, insights from survivors, and tailored to the unique context and region. For instance, receiving countries can leverage their understanding of modern slavery in the origin countries of migrating individuals to pinpoint vulnerabilities and potential victims. This can involve the utilization of CRSV data to identify those who may have experienced sexual slavery or face a risk of sexual exploitation. Our stance is not to endorse government retention of data on individuals who have experienced sexual violence; instead, we advocate for the preferable management of GBVIMS<sup>24</sup> data by humanitarian actors.

<sup>22</sup> Swati Mehta and Elizabeth McGuinness, "Prioritising Women to Receive Cash Transfers: What Are the implications of Program Design?" *Center for Financial Inclusion*, 10 October 10 2023, <https://www.centerforfinancialinclusion.org/prioritizing-women-to-receive-cash-transfers-what-are-the-implications-for-program-design>.

<sup>23</sup> Leona Vaughn and Simon Zaugg, "Strengthening Financial Inclusion to Protect Against Modern Slavery: Applying Lessons to Bank Forcibly Displaced Persons/Refugees," *UNU-CPR Insight Briefing* (New York: United Nations University, 2023).

<sup>24</sup> Gender-Based Violence Information Management System.

- Incorporate intersectional gender analyses into anti-slavery and financial inclusion policymaking to inform programme design and prioritization. This will help identify the unique vulnerabilities and challenges in the context of financial inclusion and anti-slavery efforts, faced by different genders of people in situations of conflict or crisis, especially when it results in internal displacement.
- Integrate this modern slavery knowledge into national policies, including National Financial Inclusion Strategies, crisis/disaster preparedness, national climate adaptation plans, crisis response measures, and refugee protections. This holistic approach ensures that State-level anti-slavery efforts are consistently woven into broader agendas.
- NFIS are especially key for ensuring that information is collated (e.g. through the pre-NFIS diagnostic study) on how financial exclusion is experienced by different populations, helping build knowledge on how this can expose different groups to modern slavery risks. This alignment, in particular, will help triangulate an understanding of risk levels for specific groups, including by gender, if or when a conflict or crisis occurs.
- Ensure that policies and interventions are survivor-centred, considering the unique needs and experiences of diverse men. Involve diverse men who have experienced modern slavery in the design and implementation of policies to ensure their perspectives are represented, specific needs in each context are identified, and appropriate responses are developed accordingly.
- Ensure that policies and legal frameworks incorporate gender-inclusive language to address the diverse needs of individuals in conflict and crisis situations, enabling safe and equitable access to financial services.
- Train frontline service providers to offer trauma-informed support, especially in health care, which identifies and responds to the specific needs of diverse men affected by financial and other vulnerabilities to modern slavery.
- Develop clear and specific policies and regulations to guide financial inclusion efforts to address specific financial vulnerabilities and risks faced by individuals (thin-file clients) of diverse SOGIESC, especially when assessing protection risks in crisis settings. Establish vulnerability criteria and a standardized framework, such as the European Banking Authority guidelines,<sup>25</sup> to help guide how all vulnerable customers are treated across various financial institutions and jurisdictions in crisis and conflict contexts.

## UN

The UN and its affiliated agencies play a pivotal role in shaping policies and providing humanitarian responses in times of crisis and conflict. They hold a unique position in being able to galvanize multiple actors, allocate resources, and lobby. The following key actions are proposed to strengthen the UN's response to modern slavery in conflict and crisis contexts, with a focus on gender considerations.

- Establish a collaborative partnership, such as a PPP, between governments, international humanitarian organizations, the private sector, and civil society organizations to a) increase understanding of gendered modern slavery risks; b) address the intersection of financial exclusion and modern slavery effectively; and c) increase/maintain financial inclusion when responding to conflict/crisis.
- Maintain the focused anti-slavery response within the Global Protection Cluster and consider assigning modern slavery protection as a 'Key Area of Responsibility.'
- Adopt an intersectional data approach for victim identification and vulnerability assessments, inclusive of diverse SOGIESC, that is integrated into training, awareness-raising, capacity-building, and analysis, and safeguards persons involved in data collection and the data collected.<sup>26</sup>
- Identify trends and behaviours linked to crisis-induced modern slavery through targeted data collection, which can be disaggregated by gender and cross-referenced with other variables. This will equip public/private partnerships to better

<sup>25</sup> European Banking Authority (EBA), *Guidelines on policies and controls for the effective management of money laundering and terrorist financing (ML/TF) risks when providing access to financial services* (EBA, 2023). Accessible at: [https://www.eba.europa.eu/sites/default/documents/files/document\\_library/Publications/Guidelines/2023/1054144/Guidelines%20on%20MLTF%20risk%20management%20and%20access%20to%20financial%20services.pdf](https://www.eba.europa.eu/sites/default/documents/files/document_library/Publications/Guidelines/2023/1054144/Guidelines%20on%20MLTF%20risk%20management%20and%20access%20to%20financial%20services.pdf).

<sup>26</sup> IOM and UNODC, *Making Each Case Count: Leveraging Administrative Data on Trafficking in Persons* (Geneva: IOM, 2023). Accessible at: <https://publications.iom.int/books/making-each-case-count-leveraging-administrative-data-trafficking-persons>.

identify modern slavery risks, pinpoint areas and populations with the greatest financial access needs, and facilitate the development of accessible and appropriate needs-led banking solutions, such as mobile banking, digital financial services, and community-based banking models.

- Review current UN policies and practices for modern slavery vulnerability assessments, especially with relation to inclusive gender categories and the inclusion of financial vulnerability. The meaningful inclusion and safe active participation of people of diverse SOGIESC in policy review, research, formulation, and implementation is an essential part of this work. This will assist in understanding the specific gendered vulnerabilities, especially financial vulnerabilities, to different forms of modern slavery.
- Conduct awareness-raising and capacity-building programmes to ensure all actors (financial, civil society, and humanitarian responders) understand the gender-specific vulnerabilities and risks to modern slavery in conflict and crisis contexts.
- Provide technical guidance, including specialized training and awareness campaigns, to enhance the capacity of frontline actors to recognize signs of modern slavery related to gender, especially to improve the identification of victims and vulnerable populations.

- Support the capacity of civil society to be able to advocate effectively for human rights and gender diversity, thereby strengthening their role in anti-slavery and financial inclusion initiatives. Facilitate their active involvement in data collection to comprehensively assess the risk factors affecting diverse men in crisis and conflict situations, and enable them to respond proactively to these challenges.

## Donor and Funding Organizations

Funding proposals related to anti-slavery and financial inclusion initiatives should require and give guidance for integrated, comprehensive, and intersectional gender analyses. This approach is essential for recognizing and addressing the unique vulnerabilities and challenges faced by individuals with diverse gender identities.

Prioritize funding research that deepens the understanding of a) the complex interconnections between gender, sexual violence, and modern slavery in conflict or crisis situations, and b) the gendered impact of financial inclusion or exclusion on vulnerability to modern slavery, especially the gendered financial health impacts for survivors of modern slavery in these contexts. This research can inform more effective and inclusive interventions and policies to protect populations vulnerable to modern slavery.

## About UNU-CPR

United Nations University Centre for Policy Research (UNU-CPR) is a think tank within the United Nations that carries out policy-focused research on issues of strategic interest and importance to the UN and its Member States. The Centre prioritizes urgent policy needs requiring innovative, practical solutions oriented toward immediate implementation.

The Centre offers deep knowledge of the multilateral system and an extensive network of partners in and outside of the United Nations. The United Nations University Charter, formally adopted by the General Assembly in 1973, endows the Centre with academic independence, which ensures that its research is impartial and grounded in an objective assessment of policy and practice.

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