

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

By Angharad Smith, Leona Vaughn, Toni Cela, Louis Herns 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 (ASP)

All Survivors Project 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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Acronyms

AML	Anti- Money Laundering
CEDAW	Convention on the Elimination of All Forms of Discrimination Against Women
CNLPT	National Committee for the Fight Against Human Trafficking
CRSV	Conflict-Related Sexual Violence
GBV	Gender-Based Violence
GPC	Global Protection Cluster
FDPs	Forcibly Displaced Persons
HCT	Humanitarian Country Team
IASC	Inter-Agency Standing Committee
IDP	Internally Displaced Person
INURED	Interuniversity Institute for Research and Development
IOM	International Organization for Migration
KYC	Know Your Customer
LGBTIQ+	Lesbian, gay, bisexual, transgender, queer, and intersex. The plus sign represents people with diverse SOGIESC who identify using other terms
MHPSS	Mental Health and Psychosocial Support
MRM	Monitoring and Reporting Mechanism
SCR	(UN) Security Council Resolution
SOIGIESC	An acronym for sexual orientation, gender identity, gender expression, and sex characteristics
TIP	Trafficking in Persons
TPD	Temporary Protection Directive
UN	United Nations
UNU-CPR	United Nations University Centre for Policy Research
UNHCR	United Nations High Commissioner for Refugees
UNODC	United Nations Office on Drugs and Crime

Glossary of Terms

Diverse Men

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.

Gender Identity

“Each person’s deeply felt internal and individual experience of gender, which may or may not correspond with their sex assigned at birth or the gender attributed to them by society. It includes the personal sense of the body, which may or may not involve a desire for modification of appearance or function of the body by medical, surgical, or other means.”¹

Gender Expression

“Individuals use a range of cues, such as names, pronouns, behaviour, clothing, voice, mannerisms, and/or bodily characteristics, to interpret other individuals’ genders. Gender expression is not necessarily an accurate reflection of gender identity. People with diverse sexual orientation, gender identity or sex characteristics do not necessarily have a diverse gender expression. Likewise, people who do not have a diverse sexual orientation, gender identity, or sex characteristics may have a diverse gender expression.”²

Gender Transformative

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.

Gender-Sensitive

‘Gender-sensitive’ refers to an approach or perspective that considers and respects the differences, needs, and experiences of individuals of different genders. It recognizes that people may identify as male, female, or non-binary, and that their gender identity can significantly influence their experiences, opportunities, and challenges.

A gender-sensitive approach involves considering how policies, programmes, practices, and language can affect individuals differently based on their gender. It aims to promote equality and address gender-based disparities by acknowledging and responding to the unique needs and circumstances of people of all genders. This approach is essential in various fields, including education, healthcare, workplace environments, and social policies, to ensure that discrimination and bias based on gender are minimized, and equitable opportunities are provided to everyone, regardless of their gender identity.

Gender-Responsive

While a gender-sensitive approach acknowledges gender differences and avoids harm, a ‘gender-responsive’ approach actively seeks to promote equity and inclusivity by taking specific actions to address gender disparities and challenges. A gender-responsive approach is a comprehensive strategy that goes beyond merely acknowledging gender differences; it actively incorporates 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. This approach involves inclusive decision-making, equitable opportunities, and systematic gender analysis to understand and address disparities. It guides the design of policies and programmes to actively combat gender-based discrimination and inequalities, fostering an environment where all genders can thrive. Regular monitoring and evaluation ensure that gender equality

¹ International Organization for Migration (IOM) *Full Glossary of Terms* (Geneva: IOM, 2020). Accessible at: <https://www.iom.int/sites/g/files/tmzbd1486/files/documents/IOM-SOGIESC-Glossary-of-Terms.pdf>.

² Ibid.

goals are met, making it a powerful tool for creating more inclusive and equitable systems in various areas, including education, healthcare, economic development, and social justice. Ultimately, a gender-responsive approach aims to challenge and transform societal norms and power dynamics to create a fairer and more just society for everyone. Being gender-sensitive is a foundational step towards being gender-responsive.

Financial Inclusion

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.

Financial Access

Financial access, also sometimes referred to as financial inclusion, refers to the ease and ability of individuals and businesses to access financial services and products. These services and products may include basic banking, savings accounts, credit/loans, insurance, payment services, and other financial instruments. Financial access is a critical component of economic development and poverty reduction, as it enables people to save, invest, borrow, and manage financial risks.

Modern Slavery

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.

Intersectionality

Intersectionality is a concept created by Kimberlie Crenshaw (1989), referring to the understanding that people have multiple identities (e.g. related to sex, gender, race, class, age, and ability) which can overlap and reinforce lived experiences of structural discrimination and disadvantage.

LGBTIQ+ and Diverse SOGIESC

An acronym for lesbian, gay, bisexual, transgender, intersex, and queer. The plus sign represents people with diverse sexual orientation, gender identity expressions, and/or sex characteristics (SOGIESC) who identify using other terms. Diverse SOGIESC is an umbrella term for all people whose sexual orientations, gender identities, gender expressions, and/or sex characteristics place them outside culturally mainstream categories. Throughout this report, we predominantly use the term Diverse SOGIESC. However, in specific sections, such as the case study narratives and interview transcripts, the acronym LGBTIQ+ is employed. This choice is made to align with the contextual nuances of certain countries, reflecting the prevalent definitions and terms commonly utilized within those settings.

Sexual Orientation

“Each person’s enduring capacity for profound romantic, emotional, and/or physical feelings for, or attraction to, other people. Encompasses hetero-, homo-, bi-, pan-, and asexuality, as well as a wide range of other expressions of sexual orientation. This term is preferred over sexual preference, sexual behaviour, lifestyle, and way of life when describing an individual’s feelings for or attraction to other people.”³

³ Ibid.

A Note on Trafficking Terminology

The terms ‘human trafficking’ and ‘modern slavery’ are often used interchangeably in efforts to reduce and eradicate the severe human rights violations involving the exploitation and coercion of individuals for financial gain.

Modern slavery is a relatively broad term encompassing various forms of exploitation that has gained prominence in recent years but lacks a universally recognized legal definition. In contrast, human trafficking is supported by a well-established legal framework that guides responses, including prevention, prosecution, and victim protection. The most widely recognized definition of human trafficking is provided by the United Nations Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, which supplements the United Nations Convention against Transnational Organized Crime:

“... the recruitment, transportation, transfer, harbouring 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.”^{iv}

In numerous jurisdictions worldwide, human trafficking is also considered a criminal offense, underscoring its recognition as a grave crime with legal consequences. This designation not only raises awareness but also provides a solid basis for investigations and prosecutions, as well as mobilizing resources to combat human trafficking.

During crisis situations, the issue of human trafficking becomes intricately entwined with other violations of international law occurring within the affected country or region, for example in conflict situations trafficking for the purposes of sexual slavery is a war crime.⁴ These violations can bring to bear humanitarian law, international criminal law, or the internationally recognized principles and guidelines related to internally displaced people. The Ukraine crisis saw the increased use of the term ‘conflict-related trafficking’ to enable anti-

trafficking protection responses to address the specific vulnerabilities experienced by those forcibly displaced by war.

The anti-trafficking framework refers to the commonly agreed-upon measures employed by States to combat human trafficking. The Three-P paradigm, outlined in the United States’ Trafficking Victims Protection Act (TVPA) and the United Nations’ Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children (commonly known as the Trafficking Protocol), is a widely adopted framework by governments worldwide. The protection framework focuses on identifying, referring, and providing assistance to trafficking victims, aiming to facilitate their long-term recovery and reintegration.

However, in the absence of a functioning system for protecting victims of trafficking, alternative coordination mechanisms and policies play a pivotal role in crisis settings. Examples of such mechanisms include the United Nations protection cluster response in humanitarian crises, the Refugee Coordination Model, and the initiatives carried out by the Platform on Disaster Displacement. These frameworks aim to address the multifaceted challenges presented by crises and provide support and assistance to vulnerable individuals, including victims of trafficking.

Nonetheless, while the term ‘trafficking’ can capture instances of exploitation, there are potential limitations in how it is understood to apply to the many unique challenges and vulnerabilities which appear during crises. The specific dynamics of exploitation, necessitating tailored interventions, therefore may be missed. Humanitarian and conflict settings often entail extensive displacement and migration, exposing individuals to heightened risks of different forms of exploitation at different points in their journey. While trafficking within or across borders can be a part of these contexts, other forms of exploitation, such as forced labour and sexual or criminal exploitation, can also be prevalent.

Crisis can have a disproportionate effect on marginalized populations, including women, children, refugees, internally displaced persons, and racial minority groups, who may experience intersecting vulnerabilities that contribute to an increased risk of exploitation.

⁴ Iryna Marchuk, *The Fundamental Concept of Crime in International Criminal Law: A Comparative Law Analysis* (London: Springer, 2022).

To address these challenges comprehensively, although the term 'trafficking' is used extensively in policy and practice within these settings, this report intentionally uses the term 'modern slavery.' This also reflects the language used by the Global Protection Cluster who state that "forced labour, slavery, slavery-like practices, and trafficking in persons" are collectively a global protection risk.⁵

This broader perspective brings an opportunity to implement more comprehensive protection and assistance measures that consider the multifaceted

challenges within complex contexts that have been raised in this study. Using the 'modern slavery' term, which includes trafficking, has the potential to address the specific and varied dynamics of conflict- and crisis-related exploitation and overcome the stereotypes of trafficking victims, often related to gender and migration, which may be creating barriers to vulnerable groups seeking assistance and support.

⁵ Global Protection Cluster, 'Global Protection Risks,' last accessed on 7 November 2023, https://www.globalprotectioncluster.org/Trafficking_in_Persons.

Executive Summary

In December 2022 in their report *Global Humanitarian Crises and Conflicts Increase Human Trafficking Concerns*, 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 prevention and protection measures regarding trafficking.

Financial exclusion and the experience of Conflict-Related Sexual Violence (CRSV) are viewed as specific vulnerabilities and significant risk multipliers for experiencing modern slavery 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 2022 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 reported violence worldwide, and in labour trafficking they also dominate figures.⁶ Yet, during conflicts and crises, despite being potential modern slavery victims, men are often 'unseen' in protective efforts for both anti-trafficking and financial inclusion. In practice, this is shown to be especially acute

when they are disabled; refugees/displaced; migrants; homeless; of diverse sexual orientation, gender identity, and expression (SOGIESC); Black; or from another racial minority group. The modern slavery risks to diverse men in times of crisis and their financial vulnerabilities are shown to be largely unappreciated in data, practices, policy, and funding, even when they are pervasive.

Two countries – 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 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.⁷ In the last year, United Nations (UN) sanctions have targeted individual traffickers in Haiti, exploiting primarily young men for criminal exploitation (drug and gun trafficking).⁸

Poland has taken the largest number of refugees⁹ fleeing the war in Ukraine and implemented protective interventions, including financial inclusion, for displaced people. An increased number of men from Ukraine, which shares a border with Poland, have called trafficking helplines in the region during the past year.¹⁰

These case studies help identify common themes in relation to this policy area and shape the report's

⁶ 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).

⁷ "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>.

⁸ "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>.

⁹ "Ukraine Refugee Situation," UNHCR, last accessed on 4 October 2023, <https://data.unhcr.org/en/situations/ukraine>.

¹⁰ "National Hotline for the Prevention of Domestic Violence, Human Trafficking, and Gender Discrimination," La Strada Ukraine, last accessed on 2 August 2023, <https://la-strada.org.ua/en/garyachi-liniyi>.

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.

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).

This 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 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 and 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, Poland's humanitarian response efforts were described as exhibiting clear racial bias, resulting in discriminatory treatment of refugees who were African, Asian, and/or Muslim, especially young men. Similarly, Haitian migrants encountered instances of racism in countries like the Dominican Republic and Brazil, which had prevented them from being treated as victims of abuse and exploitation.

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 crisis 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 this 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 the 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 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.

Universal 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. Valuable insights can be drawn from the progress made in addressing GBV and CRSV 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. This approach 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

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 modern slavery prevention, 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 protective 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.

Financial Sector Recommendations

- 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 transfer¹¹ and cash and voucher assistance programmes,¹² which address financial access and the related issues of low literacy levels and increasing 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.¹³
- Implement tiered Know Your Customer (KYC) and appropriate customer due diligence processes to provide wider access to basic accounts, and

¹¹ "Cash Transfers," World Food Programme, last accessed on 6 December 2023, <https://www.wfp.org/cash-transfers>.

¹² "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/>.

¹³ 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.¹⁴
- 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.¹⁵

Government Recommendations

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 data by humanitarian actors.

¹⁴ Swati Mehta and Elizabeth McGuinness, "Prioritising Women to Receive Cash Transfers: What Are the implications of Program Design?" Center for Financial Inclusion, 10 October 2023, <https://www.centerforfinancialinclusion.org/prioritizing-women-to-receive-cash-transfers-what-are-the-implications-for-program-design>.

¹⁵ 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).

- 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 NFIS, 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 (EBA) guidelines,¹⁶ to help guide how all vulnerable customers are treated across various financial institutions and jurisdictions in crisis and conflict contexts.

UN Recommendations

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 (CSOs) 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.¹⁷
- Identify trends and behaviours linked to crisis-induced modern slavery through targeted data collection, which can be disaggregated by gender

¹⁶ 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.

¹⁷ 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>.

and cross-referenced with other variables. This will equip public/private partnerships to better 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 Organization Recommendations

- 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.

Introduction

A 2023 report by the United Nations Office on Drugs and Crime (UNODC) and the 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*, states that “trafficking in persons appears more hidden than before,” particularly for children and due to the COVID-19 pandemic.¹⁸ This report also followed recent calls^{19,20} to incorporate comprehensive anti-trafficking measures into humanitarian responses, responding to emerging evidence linking global conflict and crises²¹ to risks of various forms of modern slavery, especially for women and girls.²²

The financial sector’s essential role in responding to humanitarian crises by identifying, preventing, and reducing risks of modern slavery, and the financial flows associated with it, is being increasingly recognized, most explicitly in the ‘Call to Action’ by the Inter-

Agency Coordination Group against Trafficking in Persons (ICAT).²³ Financial inclusion²⁴ can play a vital role in helping to mitigate the risks of modern slavery, including human trafficking, in conflict and crisis settings. Ensuring individuals have safe access to appropriate and affordable formal financial services, like bank accounts, remittance services, and loans, or informal financial services, such as community credit or savings groups, can increase financial resilience and reduce vulnerability to exploitation. FAST and other organizations have been actively supporting the promotion of financial inclusion for people affected by conflict and crisis around the world to help protect them from modern slavery.²⁵

It is observed, however, that there is limited information on the intersecting ways in which diverse men²⁶ experience specific risks to forms of modern slavery in conflict and crisis settings,²⁷ and what role financial exclusion may play in heightening vulnerability. What is

¹⁸ UNODC, OHCHR, and UNDP, *Global Progress Report on Sustainable Development Goal 16 Indicators*.

¹⁹ 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.

²⁰ Walk Free, *Global Slavery Index 2023* (Melbourne: Minderoo Foundation, 2023). Available at: <https://cdn.walkfree.org/content/uploads/2023/05/17114737/Global-Slavery-Index-2023.pdf>.

²¹ A crisis can have a national, regional, or global scope. Typical examples are wars, other armed conflicts, famines, and pandemics.

²² UNODC, *Conflict in Ukraine: Key Evidence on Risks of Trafficking in Persons and Smuggling of Migrants* (Vienna: UNODC, 2022). Available at https://www.unodc.org/documents/data-and-analysis/tip/Conflict_Ukraine_TIP_2022.pdf.

²³ ICAT, *A World in Crisis*; Frank Haberstroh and Simon Zaugg, “Establishing an Agile Response Process to Crisis and Conflict-related Modern Slavery and Human Trafficking Risks,” *UNU-CPR Policy Brief* (New York: United Nations University, 2023).

²⁴ Financial inclusion refers to the accessibility and availability 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.

²⁵ Finance Against Slavery and Trafficking (FAST) and Interuniversity Institute for Research and Development (INURED), “Financial Needs and Vulnerability to Modern Slavery and Human Trafficking in Haiti,” *UNU-CPR Research Report* (New York: United Nations University, 2023).

²⁶ Diverse men is a term to include men of different age groups, national or ethnic origins, gender identities/expressions, sexual orientations, disabilities, and religions etc.

²⁷ Victor Madrigal Borloz, *Report of the Independent Expert on protection against violence and discrimination based on sexual orientation and gender identity A/77/235* (2022).

known, however, is that gender norms, cultural norms, and identity-based discrimination²⁸ and prevailing stereotypes interconnect to obscure the modern slavery risks faced by diverse men, particularly those from marginalized communities or those who have experienced sexual violence in conflict.

Improving policy and practice in this area will help develop comprehensive and inclusive preventative approaches to all forms of modern slavery, supporting efforts to address the specific challenges and risks facing diverse men in conflict and crisis settings.²⁹ To contribute to this goal, FAST undertook a short scoping study with All Survivors Project, an organization dedicated to strengthening national and international responses to conflict-related sexual violence (CRSV) against men and boys through research and action. Together we explored how financial access can be strengthened in response to conflicts and crises to help protect diverse men from modern slavery risks, inclusive of sexual violence, forced labour, and criminal exploitation,³⁰ within the context of trafficking in persons.

Prevailing research consistently shows that women and girls are more vulnerable to certain forms of modern slavery, especially sexual exploitation, and in relation to financial vulnerability, research also indicates that women are left behind in accessing traditional and digital financial services.³¹ Recognizing this disproportionality for women and girls, this study increases knowledge on the under-discussed relationship between financial exclusion and vulnerability to forms of modern slavery experienced by diverse men in situations of conflict or crisis.

The findings in this report are from a study which explored international and national (Haiti and Poland) anti-trafficking policy instruments and actors. The purpose is to identify those with potential to effectively support the assessment of financial access needs and vulnerabilities of diverse men in humanitarian responses, as recommended by ICAT.³² In December 2022 in their report *Global Humanitarian Crises and Conflicts Increase Human Trafficking Concerns*, ICAT called upon the financial sector to be more involved in humanitarian

and other responses in these settings, especially to enable financial access for affected populations as part of prevention and protection measures regarding trafficking:

“Mitigate risks of trafficking in situations of displacement through comprehensive prevention and protection measures, whether in camps, urban settings, and outside of formal reception arrangements, including through timely provision of adequate documentation and enabling access to financial and communication services.”

Methodology

This short study aimed to develop insights into how international and national anti-trafficking protection policy and interventions in conflict and crisis situations could support an intersectional, gender-sensitive assessment of men’s financial vulnerabilities to modern slavery and facilitate their safe access to financial services.

The objectives were to:

- Explore how financial vulnerability is understood as a risk multiplier for trafficking, specifically in relation to interconnections with CRSV and related to all forms of modern slavery (including forced labour and sexual exploitation) in policy and practice.
- Explore what gender-sensitive approaches can look like when assessing financial vulnerabilities and financial access needs for survivors who identify as men of different ages (over 18 years-old), sexualities, gender expression, abilities, ethnicities, and racial and religious backgrounds.
- Contribute to improved understanding of how trafficking and financial exclusion risks can be better addressed in protection responses to support men’s safe access to and usage of financial services to reduce trafficking risks.

²⁸ ‘Identity based discrimination’ is used here as an inclusive term which includes all identities related to, for example, age, disability, race, religion, and sexuality.

²⁹ Henri Myrntinen, *Men, Masculinities and Humanitarian Settings: A Mapping of the State of Research and Practice-based Evidence* (New York: UN Women, 2023).

³⁰ Criminal exploitation is a form of modern slavery that sees victims being forced to work under the control of highly organized criminals in activities such as forced begging, shoplifting, pickpocketing, cannabis cultivation, drug dealing, and financial exploitation.

³¹ World Bank, *The Global Findex Database 2021: Financial Inclusion, Digital Payments and Resilience in the Age of COVID-19* (Washington DC: World Bank, 2021).

³² “National hotline for the prevention of domestic violence, human trafficking and gender discrimination,” La Strada Ukraine, last accessed on 6 December 2023, <https://la-strada.org.ua/en/garyachi-liniyi>.

Research Questions:

1. How is financial vulnerability conceptualized as a risk multiplier for trafficking during conflict and crisis settings within policy frameworks and practical implementations?
2. What are the current gender-sensitive approaches in the evaluation of financial vulnerabilities and access needs for victims and survivors who identify as men, across different age groups (above 18-years old), sexual orientations, gender identities and expression, physical abilities, ethnic backgrounds, racial identities, and religious affiliations?
3. How can improved understanding of the risks associated with financial exclusion contribute to more effective protective responses aimed at facilitating safe financial service accessibility and utilization for men?

The research process consisted of four stages:

1. **Literature review:** An extensive review of 52 documents from various sources, including 'grey' literature and academic publications. The review investigated policy and practice on gender-sensitive and survivor-informed anti-trafficking practices in conflict and crisis settings related to men's experiences, including CRSV protection interventions. Emphasis was placed on identifying work related to financial vulnerabilities and improving financial access to prevent trafficking for diverse men.
2. **Key stakeholder interviews:** Eleven key informant semi-structured interviews were undertaken with regional and international experts actively involved in protection responses. These interviews explored the implementation of the 'survivor-centred and gender-sensitive' approach, as outlined in the ICAT (2017) guidelines, in policy, practice, and operational strategies. The primary focus of these discussions was the effectiveness of these strategies in identifying financial vulnerabilities and facilitating financial access to prevent trafficking for vulnerable diverse men.
3. **Case studies:** A total of 10 semi-structured interviews were undertaken in both case study countries to understand if and how anti-trafficking efforts and financial service provision were specifically addressing the needs of diverse men.
4. **Thematic analysis and synthesis:** Thematic analysis and synthesis of all collected data, utilizing NVivo software for coding.

Data Protection

Participants in both primary research activities were informed that their responses would be used to write a research report. To ensure anonymity, interviews were ascribed a code which was used for participant identifiers, and access to these codes was limited with master lists stored separately from the data. Contact lists and other documents that contain personal information will be destroyed when no longer required for the research. Files

containing electronic data were password protected. To protect interviewee anonymity, the interviewees' names and organizational affiliations are not mentioned.

Study Limitations

The aim of this short scoping study is to offer preliminary insights into a relatively overlooked topic. The findings are presented as an assessment of how stakeholders

currently address vulnerabilities to trafficking in men from diverse backgrounds, particularly those who have encountered CRSV. The study aims to identify areas with potential for improvement in strategies and actions to align with the ICAT (2022) Call to Action for addressing anti-trafficking in humanitarian responses.

This is not a comprehensive assessment. It is important to acknowledge that the study would have greatly benefited from incorporating the perspectives of survivors. Regrettably, due to the challenges associated with engaging survivors, particularly in conflict and crisis settings, conducting in-depth interviews was not feasible. The research team benefited from the expertise of a

person with lived experience in the co-development of the research tools, analysis of the findings, and drafting of this report.

Conducting this research was a rapid process, completed over an eight-week data collection period. The sampling approach was therefore deliberate and not intended to be representative. The limited sample size means that the findings cannot be generalized broadly. Rather than providing conclusive results, our research offers valuable indications for future, more comprehensive investigations into the financial inclusion and vulnerability of diverse men.

Literature Review Findings

The literature review identified that discussions of 'gender,' especially in this policy area, are mainly discussions of sex, illustrated by the use of binary terms such as men/women and male/female. The 2022 annual thematic report of the Independent Expert on protection against violence and discrimination based on sexual orientation, gender identity, gender expression, and/or sex characteristics (SOGIESC) highlights this issue, emphasizing the need for a more inclusive and comprehensive gender perspective in conflict contexts. An intersectional approach to creating 'gender-sensitive' responses in crisis situations to protect people from trafficking will therefore require the international community to discuss and respond to gender beyond these categories. Findings are presented under three themes related to a) men in anti-slavery/anti-trafficking policy; b) gender and humanitarian responses to modern slavery risks; and c) trafficking, financial inclusion, and crisis.

Men on the Margins of Anti-Slavery/Anti-Trafficking Policy: A Shifting Tide?

Literature indicates that notions of masculinity can adversely affect men and boys, especially in contexts marked by economic insecurity such as conflict and

crisis. Gender-based norms and pressures, influenced also by intersecting structures of race, sexuality, ethnicity, religion, nationality, and social class, contribute to the trafficking vulnerabilities faced by men, including youth and migrants. For example, in cultures where men are traditionally perceived as primary breadwinners, this can put them at a higher risk for forced labour, criminal exploitation, or organ removal.³³ The pressures associated with fulfilling the 'provider' role, along with distorted notions of masculinity, further obstruct the disclosure of exploitation among this survivor group.

Data shows that men and boys constitute 50 per cent of those affected by humanitarian crises and that they are increasingly vulnerable to various forms of exploitation.³⁴ Policy relating to conflict and crisis is observed in the literature review to nonetheless be exclusively focused on human trafficking, not wider forms of modern slavery. Although, the Global Protection Cluster (GPC) now refers to "forced labour, slavery, slavery-like practices, and trafficking in persons" collectively as a global protection risk.³⁵

In conflict settings, specific attention is given to the international crime of trafficking for sexual slavery.³⁶ There is growing recognition of problems associated with CRSV and sexual gender-based violence (SGBV) targeting men and boys. This awareness has resulted in an increase in literature and scholarship on the subject and supporting guidance from NGOs.³⁷ However, a

³³ Organisation for Security and Co-operation (OSCE), *Applying Gender-Sensitive Approaches in Combatting Trafficking in Human Beings* (Vienna: OCSE, 2021).

³⁴ Development Initiatives, *Global Humanitarian Assistance Report 2023* (Bristol: Development Initiatives, 2023). Accessible at: https://devinit.org/documents/1350/GHA2023_Digital_v9.pdf.

³⁵ "Global Protection Risks," Global Protection Cluster, last accessed on 7 November 2023, https://www.globalprotectioncluster.org/Trafficking_in_Persons.

³⁶ OHCHR, "World Day Against Trafficking in Persons Joint Statement," 29 July 2022, <https://www.ohchr.org/sites/default/files/documents/issues/trafficking/statements/2022-07-29/2022-7-29-2022-World-day-against-trafficking-final-joint-statement.pdf>.

³⁷ All Survivors Project, *Checklist on preventing and addressing conflict-related sexual violence against men and boys*, (All Survivors Project, 2019). Accessible at: <https://allsurvivorsproject.org/wp-content/uploads/2022/05/Checklist-English.pdf>.

coordinated global and national response is still limited in respect to mainstreaming, policy, and implementation.³⁸ Furthermore, there is little knowledge about the interconnected vulnerabilities and needs of diverse men in the nexus of SGBV or CRSV with modern slavery.³⁹

Conflict-related vulnerabilities to trafficking have recently increased in focus due to the response to women and children displaced by war in Ukraine.⁴⁰ In relation to the specific issue of sexual slavery in conflict, whilst collected data does not identify potential slavery cases, CRSV data indicates that between 2020 and 2023 a possible 56 out of 981 reports were of men and boy victims.⁴¹

Crisis-related vulnerabilities to trafficking have been extensively documented, and they have been demonstrated to significantly heighten the risk of modern slavery. This heightened risk stems from a wide range of factors, including the widespread human, material, and economic losses inflicted by crises, and arises from the creation of an environment where coercion becomes more pervasive, vulnerabilities increase, protective structures are disrupted, and access to safe migration options is diminished.⁴²

Modern slavery datasets indicate that men and boys constitute 20 per cent of the global figure of people forced into commercial sexual exploitation. However, this group has a higher vulnerability to different modern slavery forms, such as organ trafficking⁴³ and forced labour.⁴⁴ It is also acknowledged that people from marginalized groups are especially vulnerable, including those who are without a permanent home, ethnic and religious minorities, people with disabilities, and individuals of diverse SOGIESC.^{45,46}

Within anti-trafficking policy, as in the wider humanitarian aid and financial inclusion policy realms, there exists a tendency to prioritize groups traditionally considered 'vulnerable,' such as women, children, and people with disabilities. This in turn influences priorities within funding and service provision. However well-meaning, this approach can be reductive and misses the intersections of identities, for example people with disabilities and older women. It also does not give space to consider the needs and vulnerabilities of diverse men.

A survivor contributor for the *2023 US Trafficking in Persons Report* states: "Male survivors of human trafficking have historically been silent due to the shame imbued by society's definition of masculinity. The time has come to break free of that stereotype and acknowledge that our pain matters, we define our lives, and we are men and victims too."⁴⁷

Some attribute the origins of this gendered notion of victimhood to the historical foundations of anti-trafficking legislation.^{48,49} The UN Special Rapporteur for Trafficking in Persons has made repeated calls to recognize the limitations of this victimhood construct and to improve access to international protection for men and boys. However, significant gaps persist.⁵⁰

The concept of the 'ideal victim' in modern slavery and the hierarchy of victimhood it has generated are increasingly under scrutiny.⁵¹ Ingrained biases and gender stereotypes are argued to make identifying men as trafficking victims a challenge. Studies consistently reveal a greater tendency to identify women, especially those who have experienced sex trafficking, over men. This hinders the accurate identification of men as

³⁸ Ibid.

³⁹ Barbara Buckinx, Charu Lata Hogg, and Leona Vaughn, *The Intersection of Conflict-Related Sexual Violence Against Men, Boys, and LGBTQI+ Persons and Human Trafficking* (Princeton: Liechtenstein Institute on Self-Determination, Princeton University, 2022).

⁴⁰ UNODC, *Conflict in Ukraine*.

⁴¹ "Conflict-Related Sexual Violence (CRSV) Data," The Humanitarian Data Exchange, last accessed on 3 October 2023, <https://data.humdata.org/dataset/conflict-related-sexual-violence>.

⁴² ICAT, "Trafficking in Persons in Humanitarian Crises," *Issue 02* (2017).

⁴³ UNODC, *Global Report on Trafficking in Persons* (Vienna: UNODC, 2022).

⁴⁴ Walk Free, *Global Slavery Index 2023*.

⁴⁵ ICAT, "Addressing Vulnerability to Trafficking in Persons," *Issue Brief 12* (2022).

⁴⁶ Drew Dalton and Laren Harper, *Not an Ideal Victim? Trafficking, Homelessness, and Risks Faced by LGBTQI+ Young People: A Global Scoping Report for the UN Special Rapporteur on Contemporary Forms of Slavery* (Gateshead: ReportOut, 2023).

⁴⁷ Office to Monitor and Combat Trafficking in Persons, *2023 Trafficking in Persons Report* (Washington DC: US Department of State, 2023).

⁴⁸ Anna Forringer-Beal, "Why the 'Ideal Victim' Persists: Queering representations of victimhood in human trafficking discourse," *Anti-Trafficking Review* No.19 (2022): 87–102.

⁴⁹ Laura A. Hebert, "Always Victimizers, Never Victims: Engaging Men and Boys in Human Trafficking Scholarship," *Journal of Human Trafficking* Vol. 2 No. 4 (2016): 281–296.

⁵⁰ Siobhán Mullally, *A/HRC/53/28: Refugee protection, internal displacement, and statelessness - Report of the Special Rapporteur on trafficking in persons, especially women and children* (Advance unedited version).

⁵¹ Noemi Magugliani, "(In)Vulnerable Masculinities and Human Trafficking: Men, Victimhood, and Access to Protection in the United Kingdom," *Journal of Human Rights Practice* Vol. 14 No. 2 (2022): 726–744.

modern slavery victims and subsequently reduces their access to essential assistance and protection services.⁵² For example, an analysis of the Balkan route showed that gendered assumptions of vulnerability influenced the identification (or non-identification) of trafficking victims among migrant and refugee populations. These assumptions can be reinforced when survivor support is more readily available for women than men.⁵³ Additionally, the sex of screeners, enumerators, or frontline responders can influence the comfort level and openness of individuals being screened for trafficking risk.^{54,55} The impact of this is indicated to be that men do not have their experiences documented, do not participate in justice processes, or access support designed to prevent re-trafficking and aid recovery.⁵⁶

Humanitarian Protection Responses to Modern Slavery Risks: Gender Responsive?

Literature indicates that an understanding of the factors which heighten the vulnerability of women and girls to both CRSV and trafficking in times of conflict and crisis has improved significantly in research and practical applications. Although this is shown to have helped inform protection responses, there is still much work to be done.

The report to the Human Rights Council in 2016 (A/HRC/32/41) recognized the clear link between trafficking and conflict, highlighting men and boys' vulnerabilities to forced soldiering and CRSV.^{57,58} This report was a precursor to the development of the anti-trafficking task team within the GPC.

A recent report by UNODC⁵⁹ discusses the gendered connections between climate-related risks, human trafficking, and the smuggling of migrants, and also explores women's vulnerabilities and their connection to financial exclusion.⁶⁰ This followed an explicit response to trafficking vulnerabilities for women and girls fleeing war in Ukraine. However, generally, literature on modern slavery risks in conflict and crisis does not adequately address the specific vulnerabilities faced by diverse men, highlighting a gap in understanding of the unique challenges they may experience.⁶¹

The increased international focus⁶² on preventing exploitation in crisis responses can be seen in the aftermath of revelations of sexual abuse and exploitation of women and children in Haiti by UN and NGO personnel following the 2010 earthquake, although the language of modern slavery and trafficking was not officially used when referring to these acts.^{63,64}

Responses to humanitarian crises overall are often described by the NGO sector as neglecting the needs of modern slavery victims. Such responses are specifically

⁵² Anette Brunovskis and Rebecca Surtees, "Identifying trafficked migrants and refugees along the Balkan route. Exploring the boundaries of exploitation, vulnerability, and risk," *Crime Law and Social Change* Vol. 72 (2019): 73–86.

⁵³ Ibid.

⁵⁴ Alice Eckstein, *Delta 8.7 Country Policy Research Workshop on Uganda: Workshop Briefing* (New York: United Nations University, 2022). Accessible at: https://collections.unu.edu/eserv/UNU:8849/UNUDelta_UgandaWorkshop.pdf.

⁵⁵ Anette Brunovskis and Rebecca Surtees, "Identifying trafficked migrants and refugees along the Balkan route."

⁵⁶ Julia Arnold and Sarah Gammage, "Gender and financial inclusion: the critical role for holistic programming," *Development in Practice* Vol. 29 No. 8 (2019).

⁵⁷ "Trafficking in Conflict and humanitarian crises," OHCHR, last accessed on 24 October 2023, <https://www.ohchr.org/en/special-procedures/sr-trafficking-in-persons/trafficking-conflict-and-humanitarian-crises>.

⁵⁸ United Nations General Assembly, *Special measures for protection from sexual exploitation and abuse: a new approach* (New York: United Nations, 2018). Accessible at: https://peacekeeping.un.org/sites/default/files/sg_report_a_71_818_special_measures_for_protection_from_sexual_exploitation_and_abuse.pdf.

⁵⁹ UNODC, *Conflict in Ukraine*.

⁶⁰ UNODC, *Policy Brief Climate, Crime and Exploitation. The gendered links between climate-related risk, trafficking in persons and smuggling of migrants* (Vienna: UNODC, 2022). Accessible at https://www.unodc.org/documents/human-trafficking/GLO-ACTII/UNODC_Climate-TIP-SOM_Policy_Paper.pdf.

⁶¹ Nadine White, "Forgotten and abandoned: the black, international students caught up in Ukraine conflict," *The Independent*, 24 February 2023, <https://www.independent.co.uk/news/world/europe/black-students-ukraine-war-forgotten-b2288128.html>.

⁶² United Nations General Assembly, *Special measures for protection from sexual exploitation and abuse*.

⁶³ Skye Wheeler, "UN Peacekeeping has a Sexual Abuse Problem," Human Rights Watch, 11 January 2020, <https://www.hrw.org/news/2020/01/11/un-peacekeeping-has-sexual-abuse-problem>.

⁶⁴ INURED, *Republic of Haiti Country of Origin Information Paper* (2017).

criticised for having inadequate integration of counter-trafficking measures or being ‘fragmented’ due to the involvement of multiple UN agencies and non-State actors, leading to limited coordination among them.⁶⁵ These criticisms have led to some changes.⁶⁶

UN Security Council Resolutions 2331 (2017) and 2388 (2018) recognize the need to enhance the response to trafficking in conflicts and protect displaced persons at risk of trafficking. These resolutions call for improved cooperation and joint capabilities among relevant UN agencies, including the United Nations High Commissioner for Refugees (UNHCR). In 2023, however, the UN Special Rapporteur on Trafficking in Persons, especially women and children, reports significant gaps in prevention and failures in protection infrastructures and responses in displacement and refugee settings, as well as in the context of statelessness, particularly regarding various prevalent forms of exploitation.⁶⁷

The need to establish trafficking as an ‘Area of Responsibility’⁶⁸ to ensure clear mechanisms for incorporating anti-slavery and anti-trafficking interventions into humanitarian action in these settings, has been called for by international NGO, The Freedom Fund.⁶⁹ The Child Protection and Gender-Based Violence Areas of Responsibility are said to have made efforts to address modern slavery risks, but the levels of collaboration and awareness of anti-trafficking risks within these groups are said to be lacking. Equally, many Protection Clusters are noted to have insufficient dedicated staff or programmes addressing anti-trafficking issues.⁷⁰ It remains that there is a lack of a systematic

mechanism to address trafficking within humanitarian responses, and no single accountability mechanism for trafficking.⁷¹ Therefore, the implementation of gender-responsive approaches to trafficking, as mandated by the Palermo Protocol and other international instruments, is likely underdeveloped in responses to crises.^{72,73}

Within humanitarian responses to conflict and crisis, a ‘category-based’ approach is often adopted. This approach refers to the practice of categorizing people affected by crises into distinct groups based on factors such as nationality, gender, ethnicity, religion, or legal status, and providing assistance accordingly. It has faced criticism for failing to account for diverse vulnerabilities and the unique circumstances faced by individuals.⁷⁴ For example, the application of programmes in Jordan and Syria prioritized resource allocation and materials to meet the needs of women and girls, leading to criticism that they neglected the vulnerability of men and boys in the same situation.⁷⁵ A February 2022 report titled *That never happens here*, from the International Committee of the Red Cross (ICRC), notes:

“Many humanitarian agencies not only overlook the needs of females, but also completely overlook men, boys and sexual minority groups as sexual and Gender-Based Violence (GBV) survivors in their needs assessment, discussions with communities, during data collection and follow-up community-based and humanitarian response programming.”

⁶⁵ Anna de Courcy Wheeler, *Modern slavery and trafficking in conflict: The UN’s response* (The Freedom Fund: Washington DC, 2016).

⁶⁶ UN entities have addressed trafficking in humanitarian responses to specific disasters, such as floods in Pakistan, cyclones in Bangladesh and the Philippines, and hurricanes in Haiti. Some States have incorporated actions to combat trafficking in climate change and disaster response policies. For example, Mozambique and the Philippines have issued updated procedures and policies to combat trafficking in the context of natural disasters.

⁶⁷ Siobhán Mullally, *A/HRC/53/28: Refugee protection, internal displacement, and statelessness*.

⁶⁸ Protection Clusters work on a range of protection activities. There are four specialized areas of focus: Gender-Based Violence, Child Protection, Mine Action, and Housing, Land and Property. These specialized areas of focus are termed ‘Areas of Responsibility’ or AoRs.

⁶⁹ Anna de Courcy Wheeler, *Modern slavery and trafficking in conflict*.

⁷⁰ Siobhán Mullally, *A/HRC/53/28: Refugee protection, internal displacement, and statelessness*.

⁷¹ Alice Eckstein, *Delta 8.7 Country Policy Research Workshop on Uganda*.

⁷² United Nations, *Global Compact on Refugees* (New York: United Nations, 2018). The Compact calls for more shared responsibility, and “pathways for the admission of persons with international protection needs,” to be made available on “a more systematic, organized, sustainable, and gender-responsive basis.”

⁷³ OCSE, *Applying Gender-Sensitive Approaches in Combatting Trafficking in Human Beings*. This document aimed to remedy the absence of clear legal and policy guidelines which had been highlighted by the OSCE and other experts as hindering the accurate identification of potential victims and the understanding of their vulnerabilities and needs.

⁷⁴ Oliver Lough, Veronique Barbelet, and Sarah Njeri, *Inclusion and exclusion in humanitarian action: findings from a three-year study* (London: ODI, 2022).

⁷⁵ Jessica Hagen-Zanker, Martina Ulrichs, Rebecca Holmes and Zina Nimeh, *Cash transfers for refugees. The economic and social effects of a programme in Jordan* (London: ODI, 2017).

In 2020, the International Organization for Migration (IOM) issued a practical *Introductory Guide to Anti-Trafficking Action in Internal Displacement Contexts* to provide an initial answer to the questions raised by national Protection Clusters: What is trafficking? What are the roles of responders? What does a prevention and protection response involve? And, how can I identify, refer, and manage cases?⁷⁶ The guide is for internal displacement contexts only, but it raises important considerations when it states that there is a need for “gender-sensitive” research into sexual and non-sexual forms of exploitation which may be linked to crisis or conflict. Nevertheless, it lacks a precise definition of the term ‘gender-sensitive’ and its scope. Despite recognizing the broad range of identities vulnerable to modern slavery, there’s insufficient attention given to understanding these varied identities and providing appropriate tools for their support.

For example, the report highlights that in cases where the trafficked individual is male and might face challenges accessing services provided by GBV partners due to contextual factors, humanitarians should actively seek or create specialized services to meet their needs. Concurrently, in instances where services lack sensitivity to gender and age considerations, humanitarian organizations should advocate for necessary adjustments and training for service providers. However, the report overlooks considering how intersecting vulnerabilities connected to, for example, race, citizenship, and disability, could further compound this experience.

The guide also advocates “trauma-informed” processes for assessing need and providing support, mirroring the ICAT statement of the need for “survivor-centred and gender sensitive” trafficking assessments in their 2022 Call to Action.

In summary, literature signals that in both crisis and conflict settings weakened economic and health infrastructures, restricted humanitarian access, and flawed legal regimes create a challenging environment for modern slavery victims/survivors. In such an environment, structural inequalities linked to sex and gender, but also age, sexuality, disability, religion, or race/ethnic identity are reinforced or created. The conclusions made are that

safe and inclusive responses are those that, amongst other things, are survivor-centred,⁷⁷ as well as responsive to experiences of identity-based discrimination and exclusion.

Trafficking, Financial Exclusion, and Crisis: Has This Relationship Been Identified Before Now?

Financial inclusion strategies regularly focus on women due to the gender disparities in accessing financial services, and to increase the social benefits of empowering women economically. Although not explicitly excluded from financial inclusion policy/programmes, there are varying degrees of attention and limited focus on the specific needs and circumstances of men. The existing literature on financial inclusion identifies a crucial need to remedy the lack of an intersectional focus on financial vulnerability, crucial to understanding the specific and diverse financial needs of people more comprehensively.⁷⁸

Financial inclusion can also address the financial vulnerabilities that multiply risks of experiencing modern slavery. Financial access is an integral part of humanitarian responses, but Ukraine has shown the potential for it to also be a part of the toolkit applied to protect displaced women from trafficking and exploitation. In 2022, ICAT recommended for the first time that financial access should be part of the protection responses for populations at risk of trafficking in crisis settings around the world.

There is a growing evidence base suggesting that financial exclusion operates as a critical risk multiplier for vulnerability to trafficking. However, there is limited empirical research to support the function of financial inclusion strategies in preventing trafficking before, during, and in the aftermath of crises.⁷⁹ The extent of the incorporation of financial inclusion into anti-trafficking responses during conflict and crisis settings, as a novel and recent policy shift, is also limited.⁸⁰ Although financial inclusion has been identified as a priority topic in the

⁷⁶ 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>.

⁷⁷ This project uses the term ‘survivor’ for people with lived experience of Conflict-Related Sexual Violence (CRSV) and/or slavery and trafficking, or who are or have been at increased vulnerability to slavery and trafficking due to experiences of displacement and/or CRSV.

⁷⁸ Julia Arnold and Sarah Gammage, “Gender and financial inclusion.”

⁷⁹ FAST, *Unlocking Potential: A Blueprint for Mobilizing Finance Against Slavery and Trafficking* (New York: United Nations University Centre for Policy Research, 2019).

⁸⁰ ICAT, *A World in Crisis*.

context of refugees and forced displacement^{81,82} – where, comparatively, there is a greater body of literature (though still limited)⁸³ – the causal link to preventing trafficking in these contexts from occurring has been, to a much greater extent, less explored.⁸⁴

The link to climate vulnerability and financial exclusion is gaining increased attention.^{85,86} Eighty per cent of the global unbanked population live in the most climate-vulnerable economies.⁸⁷ Irrespective of national income levels, 58 per cent of adults in these economies lack financial resilience, in contrast to 25 per cent in less climate-vulnerable economies, and social networks for emergency funds cannot be relied on due to simultaneous job loss/income reduction within families or communities.⁸⁸ Explorations of the nexus between climate change, environmental damage, and modern slavery have recently been initiated.^{89,90} However, the role of financial inclusion as a modern slavery preventive and supportive measure in these contexts remains largely unexplored.⁹¹ Developing gender-inclusive protection responses which safeguard against modern slavery in the aftermath of climate disasters will need to understand how these issues are interconnected.⁹²

Refugees, including ‘climate refugees,’ stateless persons, and forcibly displaced persons (FDPs), are frequently left out of national financial inclusion policies and regulations despite their high vulnerability to various types of modern slavery and human rights violations.

Financial inclusion programmes tailored for these groups, especially those which respond to gendered vulnerabilities, are likely to have an impact in reducing vulnerability to modern slavery, although the review did not find examples of this as an explicit policy intention. Only one country – Jordan – was found to explicitly recognize FDPs as in need within their National Financial Inclusion Strategy (NFIS).⁹³

When huge numbers of women and children fleeing the war in Ukraine were recognized as at heightened vulnerability to trafficking and exploitation, an unprecedented move happened in Europe to ensure simplified access to banking services to enhance protection for this group.⁹⁴ The enactment of the European Union (EU) Temporary Protection Directive (TPD) facilitated access to regulatory simplifications under the EU Payment Accounts Directive (2014), initially for Ukrainians, and then, albeit for a shorter time, for all people fleeing the war. Previous financial access actions for refugees and FDPs have been primarily focused on ensuring access to financial assistance, without a specific anti-trafficking protection intention. Although TPD issuances are monitored by gender, it is noted that the banks had not been collecting gender-related information during the account opening process for Ukrainian refugees. This is argued to be an area where further attention and improvements are warranted to ensure a more comprehensive approach to financial inclusion and anti-trafficking efforts.⁹⁵

⁸¹ Rye G. Kuewor, “Why financial inclusion is key to integrating and empowering refugees,” World Economic Forum, 3 August 2021, <https://www.weforum.org/agenda/2021/08/financial-inclusion-key-integrating-refugees/>.

⁸² UNHCR and Social Performance Task Force, *Serving Refugee Populations: The Next Financial Inclusion Frontier Guidelines for Financial Service Providers* (2016). Accessible at: <https://sptf.info/images/RefugeeWG-Serving-Refugee-Populations-Guidelines-FSPs-Lene-Hansen.pdf>.

⁸³ Dr Megan Dwyer and Dr Sonja Kelly, “The Ukrainian Refugee Crisis: A Women’s Financial Inclusion and Resilience Stress Test,” *Draft Working Document* (Women’s World Banking, 2022).

⁸⁴ Alice Eckstein and Angharad Smith, *Cash Transfer Mapping Report* (New York: United Nations University, 2022).

⁸⁵ UNHCR and Social Performance Task Force, *Serving Refugee Populations*.

⁸⁶ Evie Browne, *Social Protection, Climate Change Adaption and Disaster Risk Reduction: Rapid Literature Review* (Birmingham: GSDRC, University of Birmingham, 2014).

⁸⁷ Leora Klapper, Peter McConaghy, and Peer Stein, “Climate Vulnerability and Financial Exclusion Go Hand in Hand,” Centre for Financial Inclusion, 15 May 2023, <https://www.centerforfinancialinclusion.org/climate-vulnerability-and-financial-exclusion-go-hand-in-hand-what-can-be-done>.

⁸⁸ Alliance for Financial Inclusion (AFI), *Disaster Resilience Through Financial Inclusion: The Role of Financial Regulators in Disaster Risk Reduction* (Kuala Lumpur: AFI, 2021).

⁸⁹ Walk Free and Alliance Bernstein, *Bridging ESG Silos: The Intersection of Climate Change and Modern Slavery* (2023).

⁹⁰ Chris O’Connell, *From a vicious to a virtuous circle* (London: Anti-Slavery International, 2021).

⁹¹ Gifty Ampomah, Sarah Jane Danchie, Leona Vaughn, and Stephen Yeboah, *Earth Shattering: Opportunities for Financial Sector Engagement at the Nexus of Modern Slavery and Natural Resources in Ghana (Policy Brief)* (New York/Accra: United Nations University, 2023).

⁹² World Bank, *Inclusive Approaches to Disaster Risk Management — A Qualitative Review Summary Note* (Washington, DC: World Bank Group, 2022).

⁹³ AFI, *Towards Inclusive Financial Services, Financial Capability, and Financial Health for All* (AFI: Kuala Lumpur, 2022).

⁹⁴ ICAT, *A World in Crisis*.

⁹⁵ Leona Vaughn and Simon Zaugg, “Strengthening Financial Inclusion to Protect Against Modern Slavery.”

From the literature, it appears that the international community's anti-trafficking responses relating to finance in humanitarian settings have predominantly revolved around security, anti-money laundering, and counter-terrorism concerns, rather than protection of vulnerable persons. When anti-trafficking guidance in these settings do mention economic empowerment policies, they do not clearly state that ensuring access to financial services is a protective mechanism.⁹⁶

Another financial action in these settings are sanctions. UN targeted sanctions regimes have been implemented in crisis and conflict settings to disrupt trafficking in the past, but they have not had explicit actions to mitigate increased or sustained financial exclusion. The most recent humanitarian carve-out, which was introduced in Resolution 2664 and implemented across all UN sanctions regimes, does however now provide an opportunity for direct action by the international community to protect crisis-affected populations from increased financial exclusion and thus increased risk of experiencing modern slavery.⁹⁷

Summary

The literature review underscores the pressing need to address the vulnerabilities and challenges faced by men and boys who remain on the margins of anti-slavery/trafficking policies, humanitarian responses, and financial inclusion efforts.

Deep-seated gender norms, misconceptions around masculinity, and existing gaps in response strategies create significant barriers to their identification and

protection. Although there is a growing recognition of the vulnerabilities faced by men and boys in conflict and crisis situations, especially in the context of CRSV, a comprehensive global and national response is still lacking. The review highlights the vital need to redefine the 'ideal victim' concept to ensure that men's experiences are not overlooked. It also calls for the development of gender-responsive approaches in humanitarian responses, addressing the limitations of the current category-based approach that leaves certain groups underserved.

Financial inclusion, a critical factor in preventing modern slavery, has historically focused on women. But, there has been only limited attention on the needs of men. Empirical research that links its effectiveness to reducing vulnerability to trafficking in crisis situations remains scarce. The role of financial inclusion in addressing climate-related vulnerabilities and modern slavery prevention is gaining attention, and further exploration is needed. Additionally, the review underscores the need to consider diverse men's unique challenges in financial inclusion policies.

In the evolving landscape of anti-slavery and anti-trafficking efforts, there is a pressing need for a more comprehensive and gender-sensitive approach. This entails recognizing the vulnerabilities of diverse men, providing tailored support, and integrating financial inclusion strategies as protective measures. As international responses continue to evolve, addressing these complex challenges will be crucial in ensuring the safety and inclusion of all individuals affected by modern slavery.

⁹⁶ Anna de Courcy Wheeler, *Modern slavery and trafficking in conflict: The UN's response*.

⁹⁷ United Nations Security Council, Resolution 2664, adopted by the Security Council at 9214th meeting, "United Nations, 9 December 2022, S/RES.2664.

Insights: Key Stakeholder Interviews

Protecting Diverse Men from Trafficking Risks in Humanitarian Crises Through Financial Inclusion

Critical insights and themes emerged through an extensive series of key stakeholder interviews, featuring global experts in human rights, human trafficking, and financial inclusion. The interviews stress the importance of addressing awareness gaps and focusing on improving the situation for diverse men in humanitarian crises, particularly concerning modern slavery and human trafficking. Financial inclusion is seen as a critical tool, but there are implementation barriers and the need for a transformative gender approach. Data deficits and raising awareness are vital, along with collaborative efforts among various stakeholders. Embracing technology, policy reforms, implementing financial education programmes, and challenging existing gender norms are identified as key strategies going forward.

Addressing Awareness Gaps and Focusing Efforts

The interviews underscore a concerning lack of international awareness and attention, even at the donor levels, regarding the distinct modern slavery and financial exclusion risks faced in humanitarian crises by diverse men, including boys and gender diverse individuals. The modern slavery policy landscape and discourse is described as primarily focused on trafficking, especially for sexual exploitation. As such, it has been centred on supporting work with women and girls, who are the prevalent victims. One interviewee observes:

“Unfortunately, in many funding opportunities, gender analyses tend to emphasize questions about women and

girls, often overlooking the possibility that data might reveal that men are at the highest risk within a specific community. This limits our ability to address and respond to such findings in our applications.”

Such a specific focus is shown to consequently and inadvertently marginalize and invisibilize the experiences and needs of men, boys, and gender diverse individuals. It has also limited the potential for gender-specific approaches to financial inclusion as a form of protection against exploitation. As one interviewee notes:

“[T]here’s just a huge priority around women’s empowerment around gender inequality. And of course, those are very good things to be focused on. But I think that’s driven most of the programming and thinking in the financial inclusion space as well, but it is important to go beyond that, especially since we are making progress when it comes to the gender gap issue and bringing more women into the sector.”

Interviews revealed a perceived hierarchy in policy priorities and resource allocation between the needs of women and girls and those of men and gender-diverse individuals. Interviewees emphasized the importance of developing strategies that effectively advocate for both groups while ensuring that one group’s advocacy efforts do not detract from the others.

“One of the challenges is the prevailing focus on women and girls as they are often perceived as more vulnerable. This results in insufficient attention being given to men and boys. It is my hope that there will be more recognition and focus on their needs and voices. Even when projects aim to target recipients for cash assistance, I rarely see a specific category for single men. In cases

where a man has diverse sexual identity or disability, they might fall into a category, but this is infrequent. There's also a notable lack of emphasis on addressing gender-based violence. During my time at [named organization] we piloted projects in three different contexts, and they consistently targeted women and girls. This approach showed a reluctance to acknowledge that men can also be victims and survivors of gender-based violence."

Empowerment Through Financial Inclusion

For interviewees, specifically humanitarian actors, the significance of financial inclusion as a pivotal tool in mitigating the vulnerability of diverse men in humanitarian crises is underscored. They routinely describe how limited access to finances and financial services can lead to exploitative circumstances. There was a shared understanding that facilitating access to appropriate financial resources can empower diverse men, curbing the risks of trafficking and sexual exploitation.

"We are aware that risks are heightened for individuals with diverse SOGIESC. Ensuring their access to financial support can significantly reduce barriers to services and decrease their vulnerability to trafficking. This is particularly relevant for LGBTIQI+ refugees and migrants, who often find employment in informal sectors due to exclusion from more stable, formal work opportunities. This situation increases their susceptibility to sexual violence, exploitation, and potentially, trafficking, especially during crises and in impoverished areas. Addressing these concerns is crucial, especially for LGBTIQI+ individuals who face exclusion from mainstream markets."

Various obstacles to establishing preventive and protective measures for diverse men were discussed in the interviews. These challenges encompassed gender biases in categorizations of vulnerability and threat within existing social protection programmes; a deficiency of gender diversity training among service providers; anti-LGBTQI+ legislation and social attitudes; and anti-immigrant sentiments and the reluctance to disclose due to fear of reprisal. It was acknowledged that effectively implementing financial inclusion programmes for diverse

men during humanitarian crises necessitates addressing administrative, linguistic, and cultural hurdles. The interviewees emphasized the significance of developing participatory mechanisms to identify and cater to the distinct needs of this demographic group.

Harnessing Financial Sector Involvement: The financial sector emerges in the interviews as being a strong ally, existing and potential, in reducing trafficking risks. The sector's potential is described as being harnessed for championing formal payment methods, simplifying access to financial services, and backing community-based initiatives and government interventions. Several interviewees specifically pointed to successful regulatory implementations in Ukraine as a noteworthy example, such as the relaxation of Know Your Customer (KYC) regulations.

Adopting a Gender-Transformative and Responsive Approach

Tackling Gender Biases: All interviews identified that a crucial step in addressing gender bias is a shift in how data is captured and used. Collecting, monitoring, analysing, and disaggregating gender-specific data within financial inclusion initiatives is viewed as a positive move for protection responses, helping ensure the needs of all genders are better understood.

The involvement of diverse voices in programme design and execution is felt to be imperative for driving positive transformation. The interviewees underscored the importance of engaging with men and gender-diverse individuals to confront harmful concepts of masculinity and reshape gender norms within communities. Moreover, they contend that such efforts will yield positive impacts for women and girls, underscoring the need for a gender-transformative approach to achieve societal benefits.

The significance of recognizing that gender roles intersect with other identity aspects such as disability, age, and sexual orientation was stressed by interviewees. This understanding was viewed as essential for accurately identifying vulnerabilities and addressing needs in prevention and protection mechanisms.

In discussing their work with diverse men from refugee and asylum communities one interviewee notes that:

"Lack of financial inclusion was a significant issue, especially for younger cohorts, adolescents, and individuals who were

assigned male at birth or identified as male during data collection. This situation stemmed from biases in employment screening, placing transgender individuals at particular risk, especially if they hadn't completed their full conversion therapy. Their physical appearance often made them stand out, exposing them to greater risks of harm, primarily in the service sector, where they typically worked at nightclubs or bars. This made late-night travel on public transport more perilous, leading to an increase in cases of sexual exploitation and violence. Moreover, they often found themselves working in unsafe districts, including sex work.

Additional risks included isolation, mental health issues, and a lack of psychosocial support services, which were greatly needed. As a response, our current efforts are focused on developing a training curriculum for adolescent boys and young males to create and support care groups, thereby improving their mental health and psychosocial well-being. We have observed that many diverse gender and sexual identities, including men and boys, often face rejection from their families and are forced out of their homes, resulting in a lack of shelter and disrupted education, especially for migrant individuals. This isolation fosters stigma and shame around their non-heterogeneous identities.

Access to health services and the continuation of hormonal conversion therapies can also become complicated when these individuals are displaced. Additionally, navigating documentation processes as an LGBTQI+ person within different host populations can be challenging. Fear of disclosure and reporting is another significant concern, as anti-LGBTQI+ laws may lead to legal repercussions, creating a barrier to seeking help."

Gender Considerations in Programme Design

While financial inclusion initiatives were described by financial actors as always prioritizing a 'non-discriminatory' approach, interviewees highlighted

that gender-specific vulnerabilities and needs are not always factored into the design and implementation of these programmes when they should be. The gendered dimensions of financial inclusion, especially related to access and usage remains a critical area of consideration and potential exploration according to interviewees:

"In my previous work, one of our recommendations was to ensure a gendered perspective, especially from the standpoint of cash and voucher assistance. Given the overlap with financial service providers, it's crucial to embed this perspective across all stages of project cycle management. This means intentionally incorporating it from the initial needs assessment, ensuring that data is disaggregated by gender. It's not only about who collects the data but also who participates in the data analysis. If it's challenging to have diverse men, women, or non-binary individuals in the field, involving them in the analysis phase can be valuable. When designing projects, it's essential to use this gender-disaggregated information to understand the opportunities and barriers for people of diverse genders.

Another vital aspect is to continuously analyze monitoring data during project implementation, examining differences among various user groups. If feedback mechanisms provide limited information, it may signal a problem that needs further investigation. Always ask the question: What is the experience of these different groups of people? It's crucial to elevate the profile of these considerations in coordination and shared spaces, ensuring that information is shared, and discussions take place. The spirit of inclusivity needs to be present, or else it risks being pushed to the side, leaving vulnerable women and girls as the primary focus."

Bridging Knowledge Gaps

Addressing Data Deficits and Promoting Trafficking Awareness: Interviewees stressed the persistent lack of concrete evidence and data on trafficking risks in crises, which significantly impedes informed decision-making, particularly within the financial sector. They underscored the importance of comprehensive and disaggregated

data for gaining a nuanced understanding of the risks experienced by various groups. Data gaps were said to not only hinder evidence-based decision-making but also to hamper the effective design of policies.

Enhancing Monitoring and Data Collection: Existing monitoring and evaluation systems were said to often fail to capture data specifically related to anti-trafficking responses for diverse men. Interviewees highlighted that addressing gender biases in data gathering practices was important.

Metrics for Effectiveness: Interviewees delved into the various metrics employed to gauge the effectiveness of financial inclusion programmes. They emphasized the significance of not only monitoring successful outcomes, but also understanding the reasons behind unsuccessful applications for bank accounts to identify barriers. The time it takes for vulnerable individuals to reintegrate into stable financial situations was specifically highlighted as a meaningful indicator of the impact of financial inclusion efforts.

One interviewee shed light on the potential role an NFIS could play to assist in the tracking and promotion of financial inclusion efforts to reduce vulnerability to modern slavery risks. Currently, no NFIS tracks for modern slavery risks. An NFIS typically commences with a diagnostic study to gather data on the current state of financial inclusion within the country. This initial assessment forms the basis for setting specific targets and indicators to measure progress over a designated period, often spanning multiple years. Subsequently, an action plan is developed, along with a monitoring and evaluation framework, which enables ongoing progress tracking and necessary adjustments to be made as needed.

Strengthening Collaborative Endeavours

The role of the UN: UN agencies, such as UNHCR, were identified as having the potential to facilitate dialogues on modern slavery risk and support financial inclusion endeavours for diverse men during humanitarian crises. Interviewees felt that despite their potential, the UN and cluster systems currently do not adequately address the specific vulnerabilities faced by diverse men. Humanitarian crises were viewed as presenting distinct challenges due to disrupted infrastructure, resource scarcity, and heightened vulnerabilities. UN cluster systems were described as providing coordination mechanisms, but not being fully inclusive and responsive to the specific needs of diverse populations. It's worth

noting that several interviewees were actively engaged in various GPC groups but stated they had limited knowledge about activities related to the anti-trafficking group, particularly in the context of the response to the Ukraine crisis.

Raising the priority of policy and actions to reduce modern slavery amongst key actors: According to interviewees, the attainment of effective solutions to reduce modern slavery risk in crises, hinges upon fostering collaborative initiatives that engage the UN, governments, financial institutions, and investors. However, they noted that it is imperative to raise awareness about the connections regarding the interplay between financial inclusion and the prevention of exploitation.

Capacity building and collaboration between public and private sectors: Interviewees underscored the necessity of collaboration between various stakeholders, including government entities, regulatory bodies, financial institutions, and NGOs. Effective financial inclusion programmes require a joint effort to pool resources, share insights, and devise comprehensive strategies. By working together, these sectors can create holistic solutions that address both the immediate and long-term needs of vulnerable individuals, helping them recover and rebuild their lives.

Paving the Way Forward

The key stakeholder interviews underlined the urgency of understanding financial exclusion and strengthening financial inclusion for diverse men in humanitarian crises policy, in order to better address modern slavery risks, namely trafficking, in protection responses. Policymakers, institutions, and the financial sector were felt to play pivotal roles in driving positive change on gender narratives, reinforcing human rights, and preventing exploitation. Key themes emerged:

Ensuring long-term impact: Interviewees underscored the importance of challenging prevailing gender norms and embracing a gender-transformative approach across all programming initiatives. They emphasized that crafting participatory processes tailored to specific contexts is the linchpin to establishing enduring and highly effective interventions.

Sustainable anti-slavery and financial inclusion approaches to gender needs to include voices of diverse men in advocacy and policymaking. Interviewees discussed the importance of developing effective lobbying strategies to ensure the inclusion of diverse men in both international and national policy agendas. These

interviews also shed light on shared challenges across different groups in advocating for their experiences to be reflected in policy, especially in relation to gender for women and girls. There were felt to be valuable lessons to be shared:

“In the initial stages, FDPs were met with a degree of stigma within our network, making it challenging to garner support from our members, financial policymakers, and regulators. It took considerable time and effort to reshape perceptions surrounding FDPs and to emphasize their importance in our financial policies and regulations.”

Exploring innovative technological avenues:

Interviewees emphasized the potential for technology and digital financial services to empower marginalized groups, including diverse men, by providing enhanced privacy and control over financial transactions. Initiatives such as central bank digital currencies and inclusive fintech innovations were viewed to offer transformative potential. Digital innovation emerged as a significant trend during interviews for advancing financial inclusion. They highlighted the potential of leveraging digital channels and technologies to onboard vulnerable customers, provide financial education, and offer support.

Policy reforms and legal frameworks: Interviewees, representing both the financial sector and civil society organizations (CSOs), provided valuable insights for policymakers aiming to bolster financial inclusion and combat human trafficking. This included examples of streamlining customer due diligence in KYC processes,

adopting biometric technology for enhanced security, and providing accessible and secure financial services. Additionally, interviewees stressed the importance of prioritizing human rights due diligence within the financial sector, particularly in the context of serving vulnerable populations in crises. Inclusive language in policies and legal frameworks was deemed essential to address the diverse needs of individuals at risk of modern slavery. Furthermore, gender analysis was viewed as a critical tool for informing anti-trafficking protection programme design and prioritization. The absence of clear and specific policies and regulations, especially in crisis settings, to guide financial inclusion efforts was noted. It was felt that guidelines, and a standardized regulatory framework for vulnerable customers would give policymakers a roadmap to navigate the complex intersection of financial inclusion and trafficking prevention.

Promoting financial literacy and education:

Interviewees noted that financial access alone does not address financial vulnerability. They referred to the usage of products and tailored financial education programmes to empower diverse populations with the skills and knowledge to navigate formal financial systems.

The discussion mapped out the challenges in this policy landscape for the case studies to explore: modern slavery and financial inclusion data gaps which relates to low awareness; untapped technological innovation; inconsistently supporting regulatory frameworks; a lack of comprehensive and gender-sensitive approaches; prevailing societal gender norms/expectations; and a lack of representation of diverse men in policy development.

Case Study

Haiti

A Complex and Protracted Crisis

Haiti has been trapped in an escalating and prolonged crisis since 2018, characterized by deteriorating economic conditions, increasing social unrest, and targeted persecution of human rights advocates.⁹⁸ This dire situation has been compounded by a series of disaster events, the assassination of former President Jovenel Moïse in 2021, and public health crises. Adding to the complexity, heavily armed organized criminal factions ('gangs') have seized control of significant territories within the country while committing acts of violence against citizens and kidnappings for ransom, exacerbating the humanitarian crisis.

Almost 195,000 Haitians have been internally displaced due to the violence and insecurity caused by these groups and many others have left the country, often undertaking dangerous journeys they hope will lead to a better life.^{99,100} The resulting instability has driven up the prices of essential goods, leading to skyrocketing food costs and worsening hunger. The resurgence of cholera also poses a severe health threat, further complicating the ongoing challenges.¹⁰¹

Owing to its geographical vulnerability, deforestation, and weak governance Haitians are acutely exposed to natural and extreme man-made disasters such as

earthquakes, tropical storms, and hurricanes.¹⁰² These events engender substantial flooding and landslides, destroy vital infrastructure, and reduce agricultural yields. The nation ranks as the most susceptible in the Latin America and Caribbean region to disaster events, and the nineteenth most vulnerable to humanitarian crises and disasters globally, according to the INFORM Index of 2023.¹⁰³

The UN estimates that nearly 60 per cent of Haiti's population of 11.5 million people lives below the poverty line. The country ranks 163 out of 191 countries in the 2023 Human Development Index. Haiti finds itself trapped in a cycle of deepening poverty and vulnerability due to this multifaceted crisis. According to the Integrated Food Security Phase Classification (IPC) results for March to June 2023, 31 per cent of the analysed population is classified as IPC Phase 3 (Crisis) and 18 per cent as IPC Phase 4 (Emergency), meaning that almost half of the population is in need of urgent action to protect lives and save livelihoods.¹⁰⁴

Haiti's situation prompted action from the International Monetary Fund (IMF), recognizing it as one of the "50 countries particularly vulnerable to food and fertilizer price shocks, many of which are also grappling with acute food insecurity." Consequently, on 24 January, 2023 the

⁹⁸ Human Rights Watch, *Living a Nightmare*.

⁹⁹ *Ibid.*

¹⁰⁰ INURED, "Post-Earthquake Migration from Haiti to Brazil," MIDEQ Working Paper (Port-au-Prince: MIDEQ, 2020).

¹⁰¹ "Cholera – Haiti," World Health Organization, 12 October 2022, <https://www.who.int/emergencies/disease-outbreak-news/item/2022-DON415#:~:text=Situation%20at%20a%20glance,au%2DPrince%20and%20Cit%20Soleil>.

¹⁰² Louis HERN Marcelin, Toni Cela, and James M. Shultz, "Haiti and the politics of governance and community responses to Hurricane Matthew," *Disaster Health* Vol. 3 No. 4 (2016): 151–161.

¹⁰³ "Country Risk Profile," Disaster Risk Management Knowledge Centre, last accessed on 6 December 2023, <https://drmkc.jrc.ec.europa.eu/inform-index/INFORM-Risk/Country-Risk-Profile>.

¹⁰⁴ "Haiti: Acute Food Insecurity Project Update for March – June 2023," Integrated Food Security Phase Classification, last accessed on 18 September 2023, <https://www.ipcinfo.org/ipc-country-analysis/details-map/en/c/1156263/>.

IMF approved an emergency loan of \$105 million for Haiti, to target the “dire humanitarian crisis.”¹⁰⁵

Addressing these issues necessitates swift and comprehensive action from both domestic and international stakeholders. The UN plays a crucial role in mobilizing resources and providing assistance to protect the lives and well-being of Haitian citizens.¹⁰⁶ Collaborative efforts are essential to restore stability, quell violence, and facilitate economic recovery, enabling Haiti to emerge from this dire situation and forge a more secure and prosperous future.

To shed light on the financial needs and vulnerabilities of the most marginalized in Haiti, particularly as a risk multiplier for modern slavery and human trafficking, UNU-CPR’s Finance Against Slavery and Trafficking (FAST) initiative collaborated with the Interuniversity Institute for Research and Development (INURED). The resulting study, titled *Financial Needs and Vulnerabilities to Modern Slavery and Human Trafficking for Haitian Migrants* provides valuable insights into the role of financial inclusion as a protective measure, and the distinctive challenges and prospects within the Haitian context. The report emphasizes the pivotal role that financial services can play in shielding vulnerable populations, particularly in rural areas, from exploitation. It also highlights the importance of community-driven financial services as protective tools for underserved groups. The recommendations underscored the need for developing diverse formal financial services; safeguarding informal community-based financial mechanisms; prioritizing financial inclusion for vulnerable segments of the population, such as youth and women; and monitoring the potential consequences of sanctions on financial exclusion and modern slavery risks.

In 2022, a UN targeted sanctions regime was put in place in Haiti in response to the spiralling crisis. Resolution 2653 targeted organized crime linked to human trafficking and modern slavery and its financiers.¹⁰⁷ Its aim was to disrupt trafficking activities related to criminal exploitation,¹⁰⁸ reported to disproportionately involve men.

Conflict-Related Sexual Violence in Haiti

Sexual violence has reached alarming levels, with rape used as a weapon of terror and subjugation of the population. In 2022 alone, the Single Health Information System recorded a staggering 16,470 incidents of gender-based violence in Haiti. Responding to this crisis, the Security Council passed resolution 2653 (2022), imposing sanctions on those responsible for acts of sexual violence that threaten Haiti’s peace, security, or stability, including asset freezes, travel bans, and arms embargoes.

The UN’s joint report, titled *Sexual Violence in Port-au-Prince: Gangs’ Weapon of Fear*, published by the United Nations Integrated Office in Haiti (BINUH) and the Office of the United Nations High Commissioner for Human Rights (OHCHR),¹⁰⁹ outlines the disturbing reality. Armed gangs have been employing rape and collective rape to spread fear, control the population, and cause suffering. Women, girls, and sometimes men, are coerced into becoming ‘partners’ within gang strongholds, with brutal consequences for refusing sexual demands, including murder and arson.

Sexual violence in Haiti has a disproportionate impact on women and girls, as underscored by a recent World Bank report. This reality leads to a high likelihood of women experiencing physical, sexual, and emotional violence, or a combination thereof by their partners.^{110,111} Gender-based violence in Haiti remains a pressing concern, necessitating increased attention and concerted action. Regardless of their sexual orientation, all women are vulnerable to retaliation when they report such incidents. Multiple UN reports have shed light on the failure to arrest and prosecute perpetrators of GBV and sexual violence. When GBV victims are left without justice, it becomes unrealistic to anticipate a different response for the diverse SOGIESC community. In fact, it’s conceivable that there may be even less sensitivity to their plight as a stigmatized minority group.¹¹²

¹⁰⁵ Central Banking Newsdesk, “Haiti receives \$105 million emergency loan,” *Central Banking*, 25 Jan 2023, <https://www.centralbanking.com/central-banks/economics/7954300/haiti-receives-105-million-emergency-loan>.

¹⁰⁶ Office for the Coordination of Humanitarian Affairs, *Humanitarian Response Plan: At a Glance* (Geneva, 2023).

¹⁰⁷ United Nations Security Council, Resolution 2653, adopted by the Security Council at the 9159th meeting, United Nations, 21 October 2022, S/RES/2653.

¹⁰⁸ Frank Haberstroh, “New UN Security Council Sanctions for Haiti Strengthen Fight Against Modern Slavery,” 14 Nov 2022, <https://unu.edu/cpr/article/new-un-security-council-sanctions-haiti-strengthen-fight-against-modern-slavery>.

¹⁰⁹ OHCHR and United Nations Integrated Office in Haiti, *Sexual violence in Port-au-Prince: A weapon used by gangs to instil fear* (New York: United Nations, 2022).

¹¹⁰ World Bank Group, *Haiti’s Untapped Potential: An assessment of the barriers to gender equality* (Washington, DC: World Bank, 2023).

¹¹¹ Centers for Disease Control and Prevention, INURED, and Comité de Coordination, *Violence against Children in Haiti: Findings from a National Survey* (Port-au-Prince: INURED, 2014).

¹¹² INURED, *Republic of Haiti Country of Origin Information Paper*.

The Violence Against Children Study reveals that Haitian boys also face alarmingly high levels of sexual violence, although not to the same extent as girls.¹¹³ The UN has documented cases of Haitian diverse SOGIESC individuals who have been sexually assaulted by gang members. Despite being underreported due to stigma, the investigation uncovers a pattern where gang members frequently target diverse SOGIESC individuals, often based on their sexual orientation and gender identity, subjecting them to horrendous abuse. Instances exist where gay men and boys were coerced into becoming sexual ‘partners’ for gang leaders, in exchange for basic needs like food, water, and supposed protection from potential abusers.¹¹⁴ These men and boys were also victims of other forms of abuses by gang members, such as being forced to cook and take on other domestic chores.

Survivors often face a painful choice: the risk of further attacks or the stigma of their communities. Some with the means or social support, have relocated to other areas to escape, but this often exposes them to more vulnerabilities. Victims recounted being coerced into prostitution by their host families to cover their rent and basic sustenance, perpetuating their cycle of suffering. The report clearly indicates that certain victims have been forced into situations of both labour and sexual exploitation, making them susceptible to continued abuse. However, the relationship between CRSV and the intersection with human trafficking and modern slavery remains largely unexamined in Haiti.

Modern Slavery in Haiti

Haiti is a source, transit, and destination country for victims of forced labour and sexual exploitation. Although official statistics are limited, reports indicate that cases predominantly involve children in domestic labour and sex trafficking and forced labour of women and undocumented migrants, both within the country and abroad.

Due to the Government of Haiti’s limited capacity to enforce protective measures and prosecute traffickers effectively, the country has been placed on the Tier 2

Watch List in the US Department of State’s *Trafficking in Persons Report*. The Government’s allocation of resources to a written plan, which holds the potential to make strides towards meeting minimum standards, led to the granting of a waiver under the Trafficking Victims Protection Act. This waiver prevented an otherwise mandated demotion to Tier 3, thus maintaining Haiti’s Tier 2 Watch List status for the third consecutive year.¹¹⁵ Government failures are attributed to lack of investments in anti-trafficking efforts, paucity of services available for victims, ongoing impunity, particularly in high-profile cases, and failure to address the issue of child domestic servitude.

Haiti is mentioned 126 times in the 2022 *Trafficking in Persons Report* by the United States, highlighting the significant trafficking of Haitians into forced labour and other forms of modern slavery within the country and around the world. The Global Slavery Index estimates around 94,000 individuals are trapped in modern slavery in Haiti, with 66 per cent of the population deemed as vulnerable. Many poor and marginalized communities are especially at risk, and this vulnerability is exacerbated by political instability, drug trafficking, and undocumented migration.

Human trafficking impacts individuals both in Haiti and abroad. However, a December 2020 survey showed that many Haitians lack awareness about human trafficking, with 71 per cent conflating it with gender-based violence.¹¹⁶ The survey also found that many Haitians lack basic knowledge about human trafficking resources: only 18 per cent were aware of a phone number to report suspected trafficking, and only 3 per cent had heard of the National Committee for the Fight Against Human Trafficking. Studies reveal that what has been reported about modern slavery and human trafficking in Haiti is largely anecdotal. Current research on this issue has predominantly centred around the *restavek* system – a cultural practice of child fosterage rooted in local kinship traditions which has evolved into a practice of exploitation. Given the disproportionate attention placed on *restaveks*, other forms of exploitation remain under-researched.

¹¹³ Leah Glibert, Avid Reza, James Mercy, Vernoica Lea, Juliette Lee, Likang Xu, Louis Hearn Marcelin, Marisa Hast, John Vertefeulle, and Jean Wysler Domercant “The experience of violence against children in domestic servitude in Haiti: Results from the Violence Against Children Survey, Haiti 2012,” *Child Abuse and Neglect* Vol. 76 (2018): 184–193.

¹¹⁴ Office of the Special Representative of the Secretary-General on Sexual Violence in Conflict, *Conflict-Related Sexual Violence, S.2023.413* (2023). Available at <https://www.un.org/sexualviolenceinconflict/wp-content/uploads/2023/07/SG-REPORT-2023SPREAD-1.pdf>.

¹¹⁵ Office to Monitor and Combat Trafficking in Persons, 2023 *Trafficking in Persons Report*.

¹¹⁶ *Ibid.*

The Haitian Government has been criticised for consistently failing to prioritize modern slavery, resulting in the marginalization of vulnerable groups. This includes women, men and children, especially those of diverse SOGIESC, migrants, and undocumented persons. Jean-Pierre Murray's research explores trafficking of Haitians in the Dominican Republic, demonstrating that an excessive focus on women and children has hindered a comprehensive examination of a broader range of vulnerable populations.¹¹⁷ For example, despite a significant presence of Haitian men employed in the construction sector – a high risk sector for modern slavery – support and recognition as victims of trafficking are primarily extended to women and children. Murray proposes that adopting a human security perspective, one that considers intersecting identities, is crucial. It allows for a closer analysis of the various factors that render individuals vulnerable.

Murray highlights a fundamental issue deeply rooted in how we define trafficking, suggesting that gendered notions of victimhood, vulnerability and of trafficking, have unintentionally led to the exclusion of men from Haiti and neighbouring Dominican Republic anti-trafficking efforts:

“... the fundamental flaw lies at the point of problem definition – gendered conceptualizations of trafficking seem to have precluded men from being considered as victims of trafficking by the Dominican authorities. Assumptions about female victimhood have effectively excluded the possibility for there to be male victims.”¹¹⁸

Although there is limited data on the issue of modern slavery and trafficking of Haitian men, there is evidence to suggest a connection between migration-related vulnerabilities and links to exploitation. Reports suggest Haitian migrant men are exploited in the Dominican Republic, where they endure hazardous working

conditions at private sugar companies. In Brazil, a common destination for Haitian migrants, racial codes in Brazilian society create barriers to gainful employment. Haitian migrants circulating in the Brazil-Haiti corridor are mostly young males (about 65 per cent), aged 18 to 35.¹¹⁹ Haitian migrants often find themselves in low-skilled positions with exploitative working conditions and inadequate compensation. This situation is exacerbated by currency devaluation and rising food prices, leading to high employee turnover rates. Haitian migrants also face horrifying challenges on their journey across South America to the United States.¹²⁰ They are exposed to various forms of violence, including robberies, extortion, attacks, sexual abuse, and human trafficking. Disturbingly, there are reports of young men going missing or embarking on perilous journeys in makeshift boats.¹²¹ Economic hardship makes young men susceptible to migration schemes and human trafficking, exploiting their vulnerabilities.¹²²

In April 2023, the UN Committee on the Elimination of Racial Discrimination urgently called on regional nations to stop all forced repatriations of Haitian migrants. From a trafficking perspective, those who are repatriated to Haiti without proper support in chaotic settings are at high risk of experiencing or reliving various harms, including trafficking and exploitation. Still, there was a sharp increase in deportations of Haitian migrants.¹²³ As of October 2023, 184,178 individuals were repatriated to Haiti, with 73.28 per cent returned from the Dominican Republic. Various nations account for the remainder: 17.3 per cent from the United States, 3.45 from the Bahamas, 2.84 per cent from the Turks and Caicos Islands, and 2.78 per cent from Cuba. Of these repatriated individuals, 135,646 are men, accounting for 73.6 per cent of the total repatriated population. This situation raises concerns about potential violations of asylum-seeking rights, the risk of refoulement (forcible return), and mistreatment during the repatriation process, especially for men and boys.

¹¹⁷ Jean-Pierre D. Murray, “Beyond the ‘Women and Children’ Bias in Human Trafficking: A Study of Haitian Migrants in the Dominican Republic,” *Oxford Monitor of Forced Migration*, Vol. 8 No.2 (2020): 132–150.

¹¹⁸ Ibid.

¹¹⁹ “Haiti-Brazil Migration Corridor,” MIDEQ, last accessed on 6 December 2023, <https://www.mideq.org/en/migration-corridors/haiti-brazil/>.

¹²⁰ Centre de Reflexion et de Recherche sur la Migration et l'environnement, *Thematic Hearing before the Inter-American Commission on Human Rights, 183rd Period of Sessions on the Situation of Human Rights of Haitian People in Human Mobility in the Region* (March 16, 2022). Accessible at: <https://www.ohchr.org/sites/default/files/documents/issues/racism/wgeapd/cfi-res-47-21/submissions/2022-09-14/CERREMEN-Freedom-Imaginaires-Submission-NGO-PAD-hrc51-A-HRC-51-53.pdf>.

¹²¹ “Missing Migrants in the Caribbean Reached a Record High in 2022,” IOM, 24 January 2023, <https://haiti.iom.int/news/missing-migrants-caribbean-reached-record-high-2022>.

¹²² Angelika Albaladejo, “Insecurity in Haiti Laid Groundwork for Trafficking Ring in Chile,” *Insight Crime*, 18 April 2018, <https://insightcrime.org/news/brief/insecurity-haiti-laid-groundwork-trafficking-ring-chile/>.

¹²³ “Statistiques sur les personnes rapatriees en Haiti depuis 2021,” IOM, last accessed on 6 December 2023, <https://app.powerbi.com/view?r=eyJrjoiYWZiYzU2MzktOWFkMC00MDk4LWFlOTQtmQ0YU1ODkzOTQ2liwidCl6ljE1ODgyNjJkLTZmLmNDNiNC1iZDZlWjZlTQ5YzhlnjE4NiIsImMiOjhh9>.

Financial Inclusion in Haiti

Haiti faces significant challenges in achieving financial inclusion, with only about one-third of its population having access to bank accounts. Haiti's financial inclusion challenges are deeply rooted in historical, social, and economic factors. The nation's turbulent history, marked by social divisions dating back to the colonial period, has hindered efforts toward nation building and the equitable distribution of resources.¹²⁴ These divisions manifest in class disparities, where a significant portion of the population lacks access to basic services and rights. The economic, social, and geographic divides in Haiti further compound these issues, with the urban-rural gap being particularly pronounced.¹²⁵

Over time, marginalized populations in Haiti have developed self-reliance systems, such as microcredit institutions, cooperative associations, and solidarity mutuels, to fill the void left by the absence of adequate government services. This reliance on informal systems is a testament to the limited trust many Haitians place in government-regulated financial institutions, given the Government of Haiti's history of abuses against, and predation on, its citizens.^{126,127}

There are significant concerns at both macro and micro levels regarding banking operations in Haiti. Insufficient income for formal financial services is a consistent problem, but self-exclusion is also a major barrier, as many people view these services as unnecessary or untrustworthy. Lack of trust, transparency issues, and high fees contribute to widespread dissatisfaction with financial institutions, even among those with higher incomes and education levels in urban areas. Dispute resolution is a significant problem, as consumers often terminate their use of services when facing disputes due to dissatisfaction with the resolution process.¹²⁸ Many feel financial institutions are too powerful to challenge, and government dysfunction is seen as a deterrent. The banking sector in Haiti is notably conservative in its lending practices, primarily lending exclusively to their

most trusted and creditworthy clients. According to a 2018 study by FinScope Haiti, only 1 per cent of the adult population has access to a bank loan.¹²⁹

Formal financial services are predominantly concentrated in urban centres, leaving the majority of the rural population without access. The historic weakness of Haiti's economy and labour market exacerbates the low engagement with the formal financial sector. Additionally, disparities in access are closely tied to one's engagement in the labour market, with those employed in the public or private sectors having more access, while self-employed individuals, particularly those in agriculture and fisheries, face higher rates of exclusion.¹³⁰ Gender disparities in financial inclusion are evident, with women over-represented in the informal economy and therefore less likely to possess a bank account or access financial resources compared to men. This gender gap, while narrower than in neighbouring regions, still poses a significant challenge to achieving financial equality.

Data on formal borrowing and credit in Haiti are inconsistent, but overall uptake is low. Most Haitians rely on informal sources of credit, such as family and friends, due to limited access to formal lending institutions. Even small- and medium-sized enterprises face difficulties accessing credit, which hampers their growth and economic development.¹³¹

The significance of remittances and savings in driving financial inclusion in Haiti cannot be overstated. In Haiti, a very fragile State where those seeking to migrate away from current crises have significant vulnerabilities to trafficking and labour exploitation, remittances can be the only form of income for impoverished families, especially in rural areas, and contribute significantly to improving financial inclusion rates. Remittance fees in the France to Haiti corridor reduced in 2022, but remained at nearly 8 per cent,¹³² significantly higher than the Sustainable Development Goal 10 target of 3 per cent. However, greater financial literacy and awareness are needed among Haitians to fully leverage available financial products and services.¹³³

¹²⁴ INURED, *Republic of Haiti: Country of Origin Information Paper*.

¹²⁵ Ibid.

¹²⁶ FAST and INURED, "Financial Needs and Vulnerability to Modern Slavery and Human Trafficking in Haiti."

¹²⁷ INURED, *Republic of Haiti: Country of Origin Information Paper*.

¹²⁸ FAST and INURED, "Financial Needs and Vulnerability to Modern Slavery and Human Trafficking in Haiti."

¹²⁹ "2021 Investment Climate Statements: Haiti," US Department of State, last accessed on 27 October 2023.

¹³⁰ US Aid and FinMark Trust, "FinScope Consumer Survey Haiti 2018," FinMark Trust, 14 April 2018, <https://finmark.org.za/system/documents/files/000/000/188/original/FinScope-Haiti-2018-Final-Launch-24-April-2019-English.pdf?1601969395>.

¹³¹ FAST and INURED, "Financial Needs and Vulnerability to Modern Slavery and Human Trafficking in Haiti."

¹³² Global Knowledge Partnership on Migration and Development (KNOMAD), "Remittances Remain Resilient but are Slowing," Migration and Development Brief 38 (Washington, DC; World Bank, 2023). Accessible at: [migration_development_brief_38_june_2023_0.pdf](https://www.knomad.org/migration-development-brief-38-june-2023-0.pdf).

¹³³ Ibid.

Haiti's financial sector is encumbered by limitations that hinder its capacity to promote financial inclusion. The nation's placement on the 'Increased Monitoring' (grey) list by the Financial Action Task Force in 2021 due to deficiencies in combating money laundering and other financial crimes underscores the challenges. Consequently, financial exclusion, exacerbated by de-risking, limited financial access, and escalating poverty, greatly elevates the risk of modern slavery within and beyond Haiti's borders. This situation is further compounded by Haiti's status as a Small Island Developing State (SIDS) exacerbating its vulnerabilities. SIDS is a term used to describe a group of small islands and low-lying coastal countries that face unique and particular developmental challenges. The UN designates these states as SIDS, recognizing their vulnerability to environmental and economic challenges due to their small size, limited resources, and geographical location.

In recent years, there have been encouraging indications of the Government of Haiti's dedication to promoting financial inclusion. Nevertheless, recent developments in Haiti have posed substantial obstacles to the advancement of these initiatives. In September 2020, the Haitian Banking Industry Association announced the temporary closure of the country's commercial banks in response to widespread protests, citing concerns for the safety of their employees, as reported in both Haitian and Dominican media.¹³⁴ While these banks have since resumed operations, there are still notable barriers to access that have been reported.

The Central Bank of Haiti, a dedicated member of the Alliance for Financial Inclusion for over a decade, has been a staunch advocate for financial inclusion. They have not only endorsed these efforts but have also actively implemented various policies aimed at achieving this objective, aligning their actions with the seven commitment targets of the Maya Declaration.

A significant milestone was reached in June 2020 when Haiti introduced its National Financial Education Plan (PNEF), a comprehensive five-year strategy developed with invaluable support from local stakeholders. The PNEF, scheduled to run from 2020 to 2025, seeks to promote financial knowledge, skills, and responsible attitudes by fostering enhanced coordination among stakeholders, aligning common priorities, and optimizing resource allocation. This intensified focus on financial education is anticipated to complement other financial

inclusion initiatives, including consumer protection and economic stability, with the aim of catalysing Haiti's overall economic growth and well-being. However, the current status of this programme remains uncertain amidst the prevailing circumstances.

Another noteworthy initiative was the establishment of a National Strategy for Financial Inclusion (NSFI) by the Central Bank in 2013.¹³⁵ The NSFI is designed to bolster the participation of financial services in the national economy through a comprehensive approach. Its objectives include bridging gaps between the public and private sectors, dismantling barriers to accessing financial services, creating inclusive financial products, promoting financial education, and encouraging the adoption of information technology, particularly mobile wallets and mobile banking. Despite encountering significant challenges during its implementation, Haiti's NSFI aspires to provide access to financial services for a majority of the population, encompassing women, youth, rural residents, and micro-entrepreneurs.

In 2010, Haiti faced a severe earthquake, causing a major humanitarian crisis. The country's infrastructure was in ruins, posing challenges for aid agencies to provide relief efficiently. In response, the Bill & Melinda Gates Foundation and the United States Agency for International Development initiated the Haiti Mobile Money Initiative in June 2010 to expedite cash delivery to earthquake victims and ensure secure cash handling. This \$10 million initiative encouraged telecom operators and mobile money providers to promote mobile money services in Haiti. In 2010, Digicel and Voila partnered with Scotiabank to introduce mobile banking services.

However, regulatory obstacles persisted. Haiti's banking laws limited deposit-taking to licensed banks supervised by the Central Bank. To address this, policymakers introduced "distance bank accounts," allowing financial institutions to offer services through regulated entities.¹³⁶

The financial regulator ensured that financial institutions took ultimate responsibility for this service. To expand mobile money usage, financial institutions can collaborate with non-regulated third parties, including agents, super agents, point of sale terminals, ATMs, mobile phones, and bank cards.

The product architecture set transaction limits and defined permissible transactions, including cash-in and cash-out, transfers between traditional bank accounts

¹³⁴ Central Banking Newsdesk, "Haitian banks suspend operations," *Central Banking*, 16 September 2022, <https://www.centralbanking.com/regulation/banking/7953114/haitian-banks-suspend-operations>.

¹³⁵ The Government of Haiti, *Stratégie Nationale d'Inclusion Financière* (2013).

¹³⁶ "From Natural Disaster to Financial Inclusion: Haiti a DFS Front-Runner," AFI, 24 August 2016, <https://www.afi-global.org/newsroom/blogs/from-natural-disaster-to-financial-inclusion-haiti-a-dfs-front-runner/>.

and distance bank accounts, payments, wages, loan disbursements, and repayments. Agents implemented KYC rules, identified new customers, and received training on new regulations. Consumer protection measures included fee disclosure, agent identification, SMS or transaction receipts, a complaint system, and consumer education.¹³⁷

Haiti's humanitarian crisis prompted the Government and NGOs to adopt donor-to-person and social programme payments via mobile banking, which continued beyond the initial crisis. In 2013, Banque Nationale de Cr dit introduced Lajan Cash, the first interoperable mobile wallet, allowing transactional services and e-commerce payments.

In 2014, Unibank launched a product enabling distance bank account opening at any location using a bank debit card, confirmed through IDs and fingerprinting. This product gained popularity, with over 100,000 accounts opened in less than a year.¹³⁸

Haiti's experience highlights the potential of digital financial services policies in the region and offers lessons for addressing humanitarian crises and financial policy intersections. Policymakers played a vital role in ensuring humanitarian aid and crafting policies to address challenges. Effective policies safeguarded consumer rights and fostered innovation, creating an environment for delivering financial services during and in the aftermath of crisis situations.

Haiti Case Study Interviews: Findings

In an extensive interview series featuring interviewees working in human rights, human trafficking, financial inclusion, and issues affecting the diverse SOGIESC community within Haiti, a plethora of critical themes and enlightening insights came to the fore. These dialogues offered invaluable perspectives on the formidable challenges confronting Haiti in the midst of insecurity, violence, and human rights crises. One pivotal revelation from these discussions revolves around the 'internationalization' of Haiti's predicaments, where funding institutions, predominantly from the Global North, are viewed as wielding significant influence, or even 'dictating' the priorities and actions of both the

Government of Haiti and CSOs. Consequently, this dynamic was felt to obscure the pressing issues of violence, exploitation, and trafficking of men and boys.

Understanding Men's Vulnerability to Modern Slavery in Haiti

The interviews highlighted the need for clearer communication about modern slavery in Haiti, the specific vulnerabilities of Haitian men, and how Haitian policy and practice tends to view women as more vulnerable to trafficking.

Challenges in Categorization and Understanding

Interviews highlighted that modern slavery was a rarely used term, and even the term 'trafficking' did not resonate completely with communities:

"If we want to work on this question [of trafficking], we have to take stock of the situation. People who are victims, how can they talk about it? Know the terms they use. For example, if I say 'the smugglers' no one will pay me any attention, but when I say boukonn everyone will know what I'm talking about. These are terms that people use, so in using these terms, it can lead to discussions and thus make it possible to find endogenous solutions in relation to what is happening."

Boukonn is a Creole pronunciation of the Spanish term *buscones*, which is a 'labour recruiter' who may operate outside of the law and can therefore be deemed a smuggler. The interviewee explained that there is a need to contextualize such research and draw from how those affected express themselves before imposing categories on them that they do not use in their daily lives.

In further elaborating on the challenges of recognizing and defining specific categories of vulnerable individuals, such as diverse SOGIESC individuals or people with disabilities within Haitian society, one notes that these categories often do not align with Haitian societal norms. These categories have often been introduced by external organizations and NGOs, leading to questions about their

¹³⁷ Ibid.

¹³⁸ Ibid.

relevance in the local context. The interviewee raised important questions about how these categories are created and the extent to which the State acknowledges them.

“We are talking about categories that do not really exist in Haitian society, or at least not yet. These are categories in which NGOs invest to research and say that they created them. But, within the framework of what dynamics? Because a category is created from political conflicts in society at a certain moment when it is said that there is a category of citizens here who need to enjoy their rights. But, how is this created? How does the State talk about this? How does the State rule on this? The State talks about it only because these NGOs demand that the State talk about it. But, what political commitment is made in relation to these categories of citizens within society? When I talk about LGBTQI+ for the State what am I talking about if I don’t refer to an external definition, whereas internally when we work with this category, it has its own definition. So I think we have a deficit of saying the words in their realities too and what they refer to in our society. So I don’t know what I’m talking about when I talk about this category. And you can also see that it is mostly foreign researchers who work on these issues. I don’t know many Haitians, except a few Haitians who work on these issues, but they are sponsored by the outside, they do a consultation, and they talk about that. But where did we make the commitment to talk about these citizens on our own and how we understand them?”

These interviews emphasize the imperative to challenge preconceived notions of gender-based vulnerabilities in Haiti, confront discrimination against the LGBTQI+ community, and bridge the gap between external categorizations and the local understanding of vulnerable groups.

Challenges Faced by Diverse SOGIESC Individuals

Discrimination against diverse SOGIESC individuals was a recurring theme in the interviews. In a society

where traditional gender roles and norms are described as deeply ingrained, discussions explored the cultural constructions of masculinity and femininity and how these norms impact the perception of sexual violence and trafficking. The interviewees underscored the challenges faced by SOGIESC individuals in Haiti due to structural discrimination and societal prejudice:

“Last year, I participated in a seminar for the IOM [International Organization for Migration] and the Office of the High Commissioner for Human Rights at the border in Ouanaminthe, there was a policewoman, we were talking about lesbians who were raped by men. You know what the policewoman said: ‘Compared to all the work I have to do, I will not waste my time helping these people.’ This means that these people, when they are victims, if they turn to the police, they will ignore them.”

This discrimination was viewed as a contributing factor to this group’s heightened vulnerability to experiencing trafficking and violence, making it crucial to address these issues. Indeed, it highlights how low in priority this group is, how less likely they may be to report violence against them, and how less likely they are to be protected and believed.

Haiti lacks legal provisions safeguarding the rights of the LGBTQI+ community. For instance, transgender individuals face significant hurdles in changing their identity documents to officially reflect their gender, leading to precarious situations, including police detention, violent assaults, and employment discrimination.¹³⁹

Impact of Religion and Cultural Beliefs on Discrimination and Perceptions of Rights

One interviewee considered the influence of religion and culture on the perception of SOGIESC individual rights, discrimination, and the understanding of issues like human trafficking and sexual violence. Members of the SOGIESC community in Haiti have been blamed for the occurrence and frequency of cascading natural disasters. A stark example was the scapegoating following the 2010 earthquake, which resulted in a peak of violence against transgender people, reinforcing stigmatization and harassment in the streets. Many were

¹³⁹ “Building Safe Spaces for Trans People in Haiti,” UNDP, 11 April 2022, <https://www.undp.org/latin-america/stories/building-safe-spaces-trans-people-haiti>.

excluded from disaster response efforts¹⁴⁰ and some lost their accommodation during the earthquake but were not provided with access to assistance, leaving them homeless and vulnerable to harm.¹⁴¹

Gendered Vulnerabilities

Haitian society was depicted as tending to view women as more vulnerable and prone to violence in trafficking situations, thus overshadowing the plight of men. This is reflected in the words of one interviewee: “They put particular emphasis on the trafficking of women because women seem more fragile, more vulnerable to violence. In this sense women are more victims.” A number of interviewees expressed surprise that men were the focus of this study, though often this was not out of malice but due to the previous priority given to women: “Well I notice that you focus on men in your study, I don’t know why, because in general we talk about trafficking in women, for example I received more cases that were cases of trafficking in women.”

Masculinity

Conversations also highlighted the challenges men face in acknowledging their victimhood due to societal expectations and stereotypes. Societal norms and taboos can make it difficult for men to speak out about being victims of trafficking or abuse.

One interviewee pointed out potential factors influencing this silence: “Do they not like to talk about it, or do they not know if they are victims?” They proposed that men’s silence might be due to a broader lack of awareness regarding the issue of trafficking, especially when considering how traditional notions of masculinity may have influenced the conversation around this matter.

The interviewee emphasized that the general ignorance about this phenomenon, both among authorities and the population, results in fewer discussions and awareness. Consequently, men may struggle to recognize their own victimhood, believing that only women and children can be victims. Moreover, there are limited/no proper outlets for male victims to process such experiences and therefore they are forced in many cases to keep it to themselves.

This lack of recognition perpetuates the problem, preventing it from being addressed effectively:

“[P]eople must know their rights, also find out about everything that a trip entails, especially trips abroad, in order to avoid promises that can lead them into traps ... men, they have to be taught that men can be victims and if they are victims, they shouldn’t be afraid to talk about it. They must know that they are human and that they can be victims of the violation of their rights and whatever the violation, they must not be afraid to speak about it. It was the same situation for women who for a long time feared to say that they had been raped because it was a shame for them. So, it takes a job of demystification to finally allow men to express themselves. Mechanisms must be put in place to allow the victim to go to a structure, because not all human rights structures have the skills to listen to these people or to ask questions in the way that it’s necessary. People must also have references, especially when they travel, in order to know where to file a complaint if they are victims or who to refer to if they are victims.”

Intersecting Vulnerabilities

The interviews shed light on the intricate intersection of multiple vulnerabilities, including economic instability, gender bias, and restricted access to education and healthcare. These factors synergistically amplify an individual’s susceptibility to trafficking. Notably, economic vulnerability emerged as a central concern during the interviews, revealing its profound impact on trafficking and related issues. The dearth of economic opportunities and resources significantly heightens the risk of exploitation for individuals. Many interviewees emphasized that the concurrent humanitarian and economic crises have left a substantial number of men unemployed, exacerbating the problem. A recent joint study by FAST and INURED highlighted the complexities of masculinity and vulnerability experienced by Haitian men.¹⁴² Interviews highlighted how vulnerability often pushes men towards harmful coping mechanisms, leading to mental health issues. This vulnerability also

¹⁴⁰ “A model for serving key populations from Haiti,” UNAIDS, 16 August 2022, https://www.unaids.org/en/resources/presscentre/featurestories/2022/august/20220816_a-model-for-serving-key-populations-from-haiti.

¹⁴¹ “Faces of Recovery: Blaming the LGBT community for natural disasters” United Nations Haiti, 25 January 2022, <https://haiti.un.org/en/169475-faces-recovery-blaming-lgbt-community-natural-disasters>.

¹⁴² FAST and INURED, “Financial Needs and Vulnerability to Modern Slavery and Human Trafficking in Haiti.”

strains their self-identity due to an inability to fulfil societal roles, causing difficulties in relationships, even within their families. Additionally, men unable to provide often face conflicts and disrespect at home, worsening their feelings of inadequacy. Societal pressures to be providers and protectors weigh heavily on men, generating not only external challenges but also inner turmoil, eroding self-worth and causing frustration. A World Bank report has indicated that men are more likely to engage in risky behaviours such as alcohol and tobacco use and organized crime activity, and are more likely to die by suicide.¹⁴³

Prevention and Protection Policies

The exclusive emphasis on women and children as victims of trafficking is noted by a respondent as a potential result of the specific texts of international conventions and protocols:

“First, know that it is not the fault of a country. I do not say Haiti only emphasizes women and children because it is the conventions and the protocols themselves which say ... that the emphasis must be placed on women and children because it is the convention and protocols themselves which say that it is a lack of will which means that they do not address the problems of men but that they address more women’s issues. But the protocol itself has already guided the trafficking of human beings, particularly women and children.”

This, they add, has implications for national mechanisms and frameworks to respond to men while also acknowledging that the law and operational responses do address the trafficking of men, even though it might not be as emphasized:

“So, yes, there are actions that are taken in relation to men, but perhaps these actions are not plausible because there is an orientation that is made at the legal level, at the very level of the concept which directly refers to women and children.”

Anti-Human Trafficking Efforts in Haiti

Institutional dysfunction is reported by interviewees to impede the implementation of effective protection measures against human trafficking, compounded by a lack of trust in the justice system among Haitian citizens. This mistrust is said to stem from deep-rooted issues such as corruption, impunity, and collaboration between the justice system and armed gangs, which deter victims from seeking help.^{144,145}

While there is recognition of the existence of a National Committee for the Fight against Human Trafficking, its operational deficiencies caused major concern. These issues include inadequate funding, the absence of an executive secretariat, low political will, lack of monitoring, and insufficient facilities. A broader lack of focus on human trafficking is noted, including a scarcity of organizations in the country dedicated to addressing this issue. Some interviewees expressed this as a secondary concern that arises while dealing with their primary objectives: “[H]uman trafficking is a collateral problem – a challenge encountered while addressing the issues they primarily focus on.”

The challenges in combating human trafficking are also said to be exacerbated by societal attitudes, stereotypes, and misconceptions. Negative perceptions of victims, coupled with a general lack of understanding about the issue, are outlined as creating an environment where victims often do not receive the support they desperately need.

Understanding Challenges in Accessing Financial Services in Haiti

It is important to note that women generally have less access to formal financial services than men in Haiti. More men are part of the formal economy, while women are often engaged in the informal economy and related informal financial services. One interviewee outlines the ubiquity of ‘formal’ financial exclusion, but hints at experiences which are gender specific:

“In general, when I talk about financial institutions in Haiti, there are formal and less formal, I do not say informal. If we take the banks, for example, access to them is difficult for both men and women. For

¹⁴³ World Bank Group, *Haiti’s Untapped Potential: An assessment of the barriers to gender equality* (Washington, DC: World Bank, 2023).

¹⁴⁴ INURED, *Republic of Haiti: Country of Origin Information Paper*.

¹⁴⁵ Louis H. Marcelin and Toni Cela, “Justice and rule of law failure in Haiti: A view from the shanties,” *Journal of Community Psychology* Vol. 48 No. 2 (2020): 267–282. Accessible at: <https://pubmed.ncbi.nlm.nih.gov/31596967/>.

example, currently, two government identity documents are required out of the three that exist because there are two State identity documents, namely passport, driver's license, and identity card. The person has an identity card, the bank does not want to open an account for him, they ask him to bring a second document, this second can be a license, which requires knowing how to drive or the passport, you know all the problems there are to get it. These complications do not only affect men, but everyone. For women, if a woman is married, she will also have a lot of difficulty in terms of identity document. In addition, the bank requires another document, it is the certificate of residence, but in this country everyone has difficulties with regard to addresses and many people are on the run because of insecurity. So there is an exclusion that is made of all categories and all sexes, whether male or female. So it's not just about men in my opinion. However, if we take less formal institutions such as microcredits, they are most often aimed at women. These institutions are often based on the activities that women used to do. Frequently, these activities are managed by women, not by men. However, the trades that I would say that men do traditionally are trades that they do in the informal sector such as cabinet making, masonry. But sometimes, these men do not even have an identity card or any paper that attests to their knowledge in the matter. So lending money to these people to increase their business or buy tools is very difficult. Another problem, those that we call 'micro-microcredits' that sell food products in general are mainly aimed at women. Therefore, there is the type of men's activities and the identity documents required which constitute constraints for them in terms of access to financing available on the economic market."

One interviewee highlights how the barrier of requiring prior commercial activity to apply for loans excludes individuals without a minimum track record, leaving vulnerable individuals, especially men, outside of the formal financial system:

"One of the challenges men face when seeking financial service is these two questions: What businesses have you run

and what business do you have now? There are people who have gone to the office with photos to apply for a loan and when they arrive at reception, they are told: 'No it's not like that, to apply for a loan you must already have a small commercial activity of at least six months.' If it is a production activity you must have at least a year in this activity."

It is further noted that financial organizations tend to lend more to women due to the perception that they manage money better and are more responsible borrowers. One interviewee says this needs more research and suggests that socialization plays a role in this discrepancy, because women are traditionally taught to engage in trade and commerce from a young age, giving them an advantage in terms of financial literacy.

The importance of early financial education and socialization in shaping financial behaviours is highlighted as part of addressing gender-related bias in financial service provision. Financial inclusion programmes are recognized as important and key indicators, such as client retention rates and the number of individuals served, are essential for gauging the impact in removing barriers, reducing vulnerability, and fostering economic growth.

Crisis Impacts on Financial Service Provision

A financial service provider brought attention to the detrimental effects of crisis situations on financial service delivery in Haiti. In areas plagued by insecurity and territorial instability, the growth of financial institutions faces significant obstacles. These challenges ripple throughout the industry, affecting service expansion, customer engagement, and loan disbursement. The provider stated:

"In principle, when someone comes to apply for a loan, we go through this person with a fine-toothed comb to find out if they are able to repay the loan. So, now, are we going to grant a loan to someone who has no commercial activity? Or to someone who comes from a red zone where we can't even send one of our agents at the risk of being kidnapped, having their equipment stolen and even being beaten..."

The continuing insecurity was outlined as contributing to instability, deterred investments, and the lack of progress in the industry. In recent years, financial institutions note they have seen a decline, with several factors at play,

including the shrinking of operational territories, loss of customers, and difficulties in collecting repayments. They have had to adapt their priorities, with some focusing on the number of customers and others on the total value of disbursed loans. This shift has resulted in reduced services as fewer people seek credit:

"I don't want to talk to you about numbers, but over the past few years, I don't believe that there is an institution that was at a certain level in 2020 and has moved to a higher level in 2023. There are several factors that explain this 'decrecendo.' First, there is insecurity, which creates instability preventing you from investing in complete peace of mind. Secondly, there are some of our operating areas or spaces that are shrinking day by day. There are territories that we should normally exploit, but on the contrary, we lose certain territories and so we lose money, we lose customers. If you have a customer who lives in a red zone and you cannot contact him to collect the money automatically, you lose this customer, which is not in your interest. Institutions often resort to two things to secure themselves. One institution may focus on its customers as its top priority, and another may consider the amount of money it has disbursed to customers as its priority. Which means that today this institution can have 33,000 customers for a value of 3,000,000,000 gourdes and another institution can have 15,000 customers with a value of 2,000,000,000 gourdes. Thus, we cannot evaluate them on the same basis because it falls under the priority set by each institution. Services will be affected. The number of services will decrease because the number of people coming to apply for credit will decrease, not to mention that a large number of customers can also leave the metropolitan area to live in another area, and also the phenomenon of migration to Chile, Brazil, and towards the Antilles, then the new phenomenon which dates back about seven months, the Biden programme. But, since Chile had opened its doors, financial institutions were negatively affected. There were people who had come to borrow money equivalent to 100,000 gourdes, 150,000 gourdes, but it was only for the purpose of migrating, now we can't even find them."

The multifaceted challenges posed by crises were emphasized in the noted importance of tailoring strategies, training, and funding initiatives to promote economic activities and financial inclusion that reflected the local context.

A Path Forward

The issue of modern slavery in Haiti was shown to encompass a wider spectrum of victims than commonly acknowledged. Diverse men, trapped within the web of vulnerability, were said to endure unique challenges that often go unnoticed amidst trafficking discussions. Understanding the gendered dimensions of vulnerability was seen as crucial for designing comprehensive anti-trafficking/anti-slavery strategies that address the needs of all affected groups.

Collaboration and Awareness Raising

The interviews placed high significance on collaboration among diverse stakeholders, encompassing governmental organizations and NGOs, law enforcement agencies, and healthcare institutions to address human trafficking. Prioritizing the issue and giving it appropriate resources was a must. Elevating awareness and providing training to professionals for identification and assistance of victims, with the active participation of local communities and entities, was seen as potentially effective. Leveraging local networks, community-based organizations, and organizing community events was flagged as a valuable strategy to educate the public and share information about human trafficking and modern slavery more broadly, including instances involving men, to reduce stereotypes and stigma. This multi-stakeholder approach was recommended to include using multiple appropriate diverse platforms, including radio and social media, and accessible language and terminology.

Prevention Measures

Preventive measures were identified as needing to focus on empowering potential victims with knowledge and resources on their rights (financial, human, and labour) and in particular, about modern slavery and the risks associated with migration so that they can make informed decisions.

The Prevention Role of Financial Institutions

Acknowledging the challenges faced by financial institutions, including security concerns and external factors, their role was still seen as having great potential to address modern slavery. Imparting financial education, fostering economic opportunities for vulnerable groups, and establishing responsible lending systems were highlighted as important roles that could be fulfilled in partnership with non-profit organizations and government agencies.

Supporting Victims

Interviews recognized the absence of specific support organizations and the lack of capacity in other organizations to address the specific needs of modern slavery victims, especially men or SOGIESC people.

Providing psychosocial support and creating a safe space for individuals who are victims of violence or trafficking, regardless of their gender or sexual orientation, to access their rights was raised as important.

Importance of Research

The discussions emphasized that there is currently a lack of statistical data concerning the extent of modern slavery and trafficking networks in Haiti. This underscores the pressing need for increased research efforts and documentation of cases, with a particular focus on those involving men, by various organizations and institutions. This will give deeper insights into how to effectively combat modern slavery, identifying patterns, vulnerabilities, and successful approaches for prevention and intervention.

Case Study

Poland

Responding to Humanitarian Crises

Poland, situated at the crossroads of Central Europe, has found itself at the nexus of contemporary global migration and refugee dynamics in recent years. During 2015–2016, Poland, like other European nations, experienced a notable increase in the arrival of refugees and migrants. As an EU member, Poland participated in efforts to distribute refugees among EU States but resisted mandatory quotas, citing national sovereignty and the authority to determine asylum policies.¹⁴⁶ Policies were developed to facilitate refugees' integration and access to employment, education, and healthcare, supported by the work of humanitarian organizations and civil society who provided shelter, legal aid, language classes, and social assistance.

In 2021, Poland faced a tense humanitarian crisis at its border with Belarus, where a significant number of migrants, mainly from Iraq, Syria, and Afghanistan attempted to enter the EU.^{147,148} Some 39,674 attempted border crossings from Belarus occurred in that year.¹⁴⁹ The situation escalated into a humanitarian crisis, with

refugees stranded at the border, often in dire conditions. Many were living in makeshift camps or forested areas, lacking access to essential services and international protection. The humanitarian situation drew the attention of international organizations and human rights groups.^{150,151} Refugees not only reportedly encountered violence from Polish border forces, they also encountered barriers when pursuing asylum claims and a series of systematic mass expulsions criticised as disregarding international and EU law obligations.¹⁵²

The following year, Poland was the primary destination of the estimated 6.3 million people displaced by the war in Ukraine.¹⁵³ As of July 2023, Poland had registered 968,389 Ukrainian refugees, and recorded 14,881,471 border crossings in 2022.¹⁵⁴ The choice of Poland as a safe haven for Ukrainian refugees was in part due to their shared border, but also due to the longstanding tradition of labour migration between the two nations.¹⁵⁵

¹⁴⁶ Monika Kabata and An Jacobs, "The 'migrant other' as a security threat: the 'migration crisis' and the securitising move of the Polish ruling party in response to the EU relocation scheme," *Journal of Contemporary European Studies*, Vol. 31 No. 4 (2022): 1–17.

¹⁴⁷ This number includes multiple attempts by the same individuals.

¹⁴⁸ Dr. Çlirim Toçl, "The Belarus Crisis: the Weaponization of Migration," *Beyond the Horizon*, 9 November 2021, <https://behorizon.org/the-belarus-crisis-the-weaponisation-of-migration/>.

¹⁴⁹ "Polish Forests Full of Fear," *Balkan Insight*, last accessed on January 10 2024, <https://balkaninsight.com/polish-forests/>.

¹⁵⁰ OHCHR, "Poland: Human rights defenders face threats intimidation at Belarus border – UN experts," 15 February 2022, <https://www.ohchr.org/en/press-releases/2022/02/poland-human-rights-defenders-face-threats-and-intimidation-belarus-border?LangID=E&NewsID=28121>.

¹⁵¹ "End 'double standards' on refugees, UN expert urges Poland," *Al Jazeera*, 28 July 2022, <https://www.aljazeera.com/news/2022/7/28/end-double-standards-on-refugees-un-expert-urges-poland>.

¹⁵² Amnesty International UK, "Belarus/EU: Authorities playing 'sordid game' with asylum-seekers and migrants – new evidence," 20 December 2021, <https://www.amnesty.org.uk/press-releases/belarus-eu-authorities-playing-sordid-game-asylum-seekers-and-migrants-new-evidence#:~:text=New%20evidence%20by%20Amnesty%20International.forces%20at%20the%20Polish%20border>.

¹⁵³ "Ukraine Refugee Situation," Operational Data Portal, last accessed on 7 December 2023, <https://data.unhcr.org/en/situations/ukraine>.

¹⁵⁴ Ibid.

¹⁵⁵ Elżbieta Ociepa-Kicińska and Małgorzata Gorzałczyńska-Koczkodaj, "Forms of Aid Provided to Refugees of the 2022 Russia-Ukraine War: The Case of Poland," *International Journal of Environmental Research and Public Health* Vol 19 No 12 (2022): 1–17.

Responses to Ukrainian Refugees in Poland

Refugees from Ukraine are predominantly women, children, and elderly individuals, due to Ukrainian legislation that bars men aged between 18 and 60, and eligible for military conscription, from leaving the country.¹⁵⁶ This has reshaped gender roles and household labour dynamics among refugee families. Refugees who are men are mainly older; non-Ukrainian nationals; Ukrainian citizens exempt from military service; or men with disabilities. Between February 2022 and August 31, 2023 an estimated 19,740 men have reportedly crossed Ukraine's borders 'illegally' into neighboring countries. As the conflict persists, reports of Ukraine's changing policy on conscription have raised concerns.¹⁵⁷ Viral videos claiming to show men snatched from the street to be conscripted have emerged alongside allegations of corrupt officials taking bribes to provide exemption.¹⁵⁸ It is highly likely the number of men fleeing Ukraine will increase and this will necessitate increased attention from receiving countries to address the vulnerabilities they will face. Modern slavery risks will probably intensify for men in this period and into the post-war rebuilding/recovery phase, especially in relation to forced labour or labour trafficking.¹⁵⁹

There has been a large scale response from grassroots organizations and government authorities in Poland.¹⁶⁰ In an extraordinary and unprecedented fashion, systemic and legislative changes were swiftly devised and implemented on short notice.¹⁶¹ These changes were enacted at both the national and local levels, ensuring

that Ukrainian refugees had access to essential, life-saving services. Along the border regions, reception centres and host community accommodations were established, complete with warm meals and transportation services.^{162,163}

Local communities and civil society swiftly mobilized volunteers to provide relief items and offer accommodation across the entire country. To address basic needs, emergency cash payments were disbursed to refugees, and households hosting refugees received financial assistance. Financial institutions acted quickly to provide access to bank accounts, banking services, and payment cards so that all social benefits and cash payments could be safely received and used for the immediate needs of FDPs.¹⁶⁴

Notably, Poland's central bank worked closely with the central bank of Ukraine to facilitate the smooth exchange of *Hryvnia* (the Ukrainian currency) into *Zloty* (the Polish currency).¹⁶⁵ Financial institutions and public, regulatory, and supervisory authorities in Poland collaborated to offer simplified and sometimes fee-free access to bank accounts, e-banking services, and payment cards.

The Polish Financial Supervision Authority (KNF) and the Polish Bank Association joined forces with local banks to address the banking needs of Ukrainian refugees. This cooperative effort led to the issuance of clear communication by the KNF, outlining comprehensive guidelines for providing banking services to refugees from Ukraine. This included delaying identity verification processes within due diligence processes, which ensured that displaced individuals could quickly and securely

¹⁵⁶ UN Women in Ukraine and CARE International, *Rapid Gender Analysis of Ukraine* (Kiev and Geneva: UN Women in Ukraine and CARE International, 2022). Accessible at: <https://www.unwomen.org/sites/default/files/2022-05/Rapid-Gender-Analysis-of-Ukraine-en.pdf>.

¹⁵⁷ Shaun Walker, "Ukraine to change conscription policies in drive to sustain fighting capacity," *The Guardian*, 27 November 2023, <https://www.theguardian.com/world/2023/nov/27/ukraine-change-conscription-policies-russia-war>.

¹⁵⁸ Shaun Walker and Jamie Wilson, "Bribes and hiding at home: the Ukrainian men trying to avoid conscription," *The Guardian*, 15 August 2023, <https://www.theguardian.com/world/2023/aug/15/bribes-and-hiding-at-home-the-ukrainian-men-trying-to-avoid-conscription>.

¹⁵⁹ Anniina Jokinen and Anna-Greta Pekkarinen, *Patterns of exploitation. Policy brief on the latest trafficking trends and modus operandi* (HEUNI, 2023).

¹⁶⁰ Elżbieta Ociepa-Kicińska and Małgorzata Gorzałczyńska-Koczkodaj, "Forms of Aid Provided to Refugees of the 2022 Russia-Ukraine War: The Case of Poland."

¹⁶¹ Group of Experts on Action against Trafficking in Human Beings (GRETA), *Evaluation Report Poland, Third Evaluation, Access to Justice and effective remedies for victims of trafficking in human beings* (Strasbourg: Council of Europe, 2023). Accessible at: <https://rm.coe.int/greta-evaluation-report-on-poland-3rd-evaluation-round-greta-2023-08-a/1680ab7039>.

¹⁶² UNHCR, *Poland: Poland Chapter of Ukraine Situation Regional Refugee* (2023). Accessible at: <https://data.unhcr.org/en/documents/details/99093>.

¹⁶³ GRETA, *Evaluation Report Poland*.

¹⁶⁴ World Bank, *Economic Empowerment of Forcibly Displaced Persons from Ukraine: Assessment of the Polish Legal and Regulatory Framework and the Role of the Private Sector* (Washington, DC: World Bank, 2023). Accessible at: <https://thedocs.worldbank.org/en/doc/899da35b4a168c6426798f5760a71964-0570012023/original/Poland-Report.pdf>.

¹⁶⁵ "Polish central bank programme to allow Ukrainians to convert cash," *Reuters*, 17 March 2022, <https://www.reuters.com/business/finance/polish-central-bank-programme-allow-ukrainians-convert-cash-2022-03-18/>.

receive and utilize social benefits and cash payments for their immediate necessities. Examples from two Polish banks about how they implemented guidance for Ukrainian refugees with specific intention to safeguard them from experiences of modern slavery, is outlined in a FAST Insight Briefing, *Strengthening Financial Inclusion to Protect Against Modern Slavery: Applying Lessons to Bank Forcibly Displaced Persons/Refugees*.¹⁶⁶

Beyond domestic collaborations, banks also engaged with international organizations such as UNHCR to ensure that Ukrainian refugees had access to essential services and livelihood support. Santander Polska, with support from the International Finance Corporation, developed their original offer to go beyond basic banking and offer loans to women entrepreneurs forcibly displaced from Ukraine.¹⁶⁷ This multifaceted approach underscores the responsiveness and commitment of Poland's banking sector to address the needs of refugees from this conflict.

To promote self-reliance and inclusion, Ukrainian nationals were granted access to the labour market and the national social service system, aligning with the EU's Temporary Protection Directive, a historical first for the EU. As of July 2023, 1,637,964 refugees had been registered for Temporary Protection or similar national protection schemes in Poland. This Directive grants refugees from Ukraine similar, though not identical, rights as EU citizens under the free movement of persons. Authorities also extended support to childcare services and facilitated the admission of Ukrainian students into the Polish school system, even enabling online education when necessary. Despite the absence of a coherent migration policy in Poland prior to 2022, the nation displayed exceptional adaptability and humanitarian response during the refugee influx from Ukraine.¹⁶⁸

On 12 March, 2022, the Polish Parliament passed a significant piece of legislation known as the 'Act on Assistance for Ukrainian Citizens' in response to the ongoing armed conflict. This Act encompasses a wide array of provisions aimed at safeguarding the rights and well-being of refugees from Ukraine.¹⁶⁹ It addresses critical areas such as documentation, access to employment, healthcare, education, and social security benefits, all of

which are now available to Ukrainian refugees at a level equal to that enjoyed by Polish nationals.

The Act on Assistance for Ukrainian Citizens came with a substantial allocation of funds and grants various rights and benefits to Ukrainian refugees. To access these benefits, in most cases, refugees are required to apply for a PESEL number. PESEL, an acronym for the Polish term *Powszechny Elektroniczny System Ewidencji Ludności* [Universal Electronic System for Registration of the Population], is a unique identification number that is mandatory for individuals, both Polish and foreigners alike, seeking access to the healthcare system, social assistance provisions, the acquisition of a driver's license, or the establishment of a business in Poland, among other financial benefits.¹⁷⁰

It's important to note that this Special Act specifically applies to Ukrainian nationals, whereas third-country nationals who were previously residing in Ukraine fall under the purview of the 'Act on Granting International Protection' from 2003. This latter act regulates the provision of temporary protection in Poland, aligning with the implementing decision set forth by the Council of the European Union.¹⁷¹

EU Member States must, at a minimum, provide temporary protection to Ukrainians residing in Ukraine before 24 February, 2022, as well as stateless individuals and beneficiaries of international protection who lived in Ukraine before this date. The Directive gives EU Member States the discretion to either apply the Directive or grant a national protection status to other third-country nationals who legally resided in Ukraine and cannot return to their home countries. Because of the two-fold approach to refugees in the application of legislation and policies, and the fact that the majority of government programmes in response to the war in Ukraine are designed to assist Ukrainian refugees, third-country nationals, especially those who were already in irregular situations in Ukraine, do not benefit from the wide range of support and financial aid designated for Ukrainians.

¹⁶⁶ Leona Vaughn and Simon Zaugg, "Strengthening Financial Inclusion to Protect Against Modern Slavery."

¹⁶⁷ "IFC Santander Bank Polska Support Ukrainian Forcibly Displaced Persons and their Businesses in Poland," International Finance Corporation, 27 September 2023, <https://pressroom.ifc.org/all/pages/PressDetail.aspx?ID=27785>.

¹⁶⁸ UNHCR, *Poland Planned Response January – December 2023* (2023). Accessible at: <https://data.unhcr.org/en/documents/details/99093>.

¹⁶⁹ "The Act on Assistance for Ukrainian Citizens," Stowarzyszenie Interwencji Prawnej, last accessed on 27 October 2023, <https://ukraina.interwencjaprawna.pl/the-act-on-assistance-for-ukrainian-citizens/>.

¹⁷⁰ Karolina Sobczak-Szelc, Marta Pachocka, Konrad Pędziwiatr, and Justyna Szałańska, *Integration Policies, Practices and Responses. Poland – Country Report* (Warsaw: European Union, 2020).

¹⁷¹ UNHCR, *Ukraine Situation Refugee Regional Response Plan 2023* (Geneva: UNHCR, 2023).

However, existing research predominantly centres the needs of Ukrainian beneficiaries of temporary protection in Poland, leaving a gap in understanding the specific experience and needs of third-country nationals. A 2023 IOM report highlights the challenge of low response rates from third-country nationals in surveys, possibly due to their remote locations or the limited presence of such individuals in collective sites.¹⁷² Additionally, a recent report from the European Institute for Crime Prevention and Control emphasizes the difficulties since the outbreak of the war faced by third-country nationals and undocumented migrants in accessing their rights and protection in Poland, Latvia, and Estonia.¹⁷³ This leaves non-Ukrainian citizens reliant on assistance provided by private or international humanitarian actors and facing multifaceted vulnerabilities.

The World Bank¹⁷⁴ identifies three categories of people affected by the conflict in Ukraine and of FDPs in Poland, each with varying levels of protection:

1. Ukrainian citizens who arrived in Poland after 24 February, 2022 enjoy extensive rights and social protection, similar to Polish citizens. They have access to social benefits, the labour market, education, and healthcare.
2. Third-country nationals who arrived in Poland after 24 February, 2022, are granted a 15-day consent, provided that they had been granted refugee status in Ukraine (or that such status had been granted to their immediate family members).¹⁷⁵ However many have faced difficulties in legalizing their stay and there are a number of restrictions in place. For instance, a person cannot work for six months from date of submission, even if they were in Poland before applying. After six months, if there is no decision, they can apply for a work permit. However, a court may also decide to put an applicant in detention
3. Ukrainian citizens who arrived in Poland before 24 February, 2022 must generally follow standard rules for applying for residence and work permits.

There are exceptions, such as a simplified work procedure for citizens of Ukraine and five other countries, allowing them to work without a work permit based on a declaration from their employer.

As noted by the Special Rapporteur on the human rights of migrants, Felipe Gonzalez Morales, on his visit to Poland and Belarus:

“Although refugees fleeing the same war are all admitted in Poland, the applicable legal framework and the consequent entitlements are not the same, depending on their nationality and migration status in Ukraine. Affected individuals include permanent residence permit holders and particularly those in irregular situations, such as undocumented migrants and those who were waiting for a final decision on their applications for international protection in Ukraine. I note with concern that this double standard approach has led to feelings of being discriminated among third country nationals.”¹⁷⁶

Controversy, Discrimination, and Violence

The treatment of refugees from other conflict zones during the Belarus crisis was marked by deterrence and containment policies. Poland’s approach to refugees fleeing from Ukraine has been significantly different, but violence and racial discrimination remains a concern. International criticism of the treatment of individuals from Black and other racially minoritized backgrounds seeking refuge from the conflict was extensively covered in the media.¹⁷⁷ A UK newspaper, *The Guardian*, documented the experience of a 24-year-old medical student from Kenya, who endured hours of waiting at the Ukrainian-Polish border as Ukrainian nationals were given priority by border guards.¹⁷⁸ Upon finally crossing the border, she and her Kenyan friends boarded a complimentary bus arranged by an NGO, which was headed to a hotel

¹⁷² IOM, *Poland. Surveys with Refugees from Ukraine: Needs, Intentions, and Integration Challenges* (Warsaw: IOM, 2023).

¹⁷³ Anniina Jokinen and Anna-Greta Pekkarinen, *Patterns of exploitation*.

¹⁷⁴ The World Bank, *Economic Empowerment of Forcibly Displaced Persons from Ukraine* (Washington D.C, World Bank: 2023).

¹⁷⁵ “Options for third-country nationals (other than Ukrainian citizens) residing in Poland on a 15-day permit,” I Stowarzyszenie Interwencji Prawnej, last accessed on 7 December 2023, <https://ukraina.interwencjaprawna.pl/options-for-third-country-nationals-other-than-ukrainian-citizens-residing-in-poland-on-a-15-day-permit/>.

¹⁷⁶ OHCHR, “End of visit statement of the Special Rapporteur on the human rights of migrants, Felipe González Morales, on his visit to Poland and Belarus (12 – 25 July 2022),” 28 July 2022.

¹⁷⁷ Bolaji Balogun, “Ukraine Must Stand: Expanding Racial Borders – Bolaji Balogun,” *History Speaks*, 19 March 2022, <https://historianspeaks.org/blog/f/ukraine-must-stand-expanding-racial-borders-bolaji-balogun-phd>.

¹⁷⁸ Lorenzo Tondo and Emmanuel Akinwotu, “People of colour fleeing Ukraine attacked by Polish nationalists,” *The Guardian*, 2 March 2022, <https://www.theguardian.com/global-development/2022/mar/02/people-of-colour-fleeing-ukraine-attacked-by-polish-nationalists>.

near Warsaw offering free accommodation for Ukrainian refugees. However, upon reaching the hotel, they were denied lodging even after offering payment for rooms. In contrast, white foreign nationals interviewed by *The Guardian* recounted positive treatment by Polish authorities.¹⁷⁹

Reports have also emerged regarding targeted attacks against individuals from Africa, South Asia, and the Middle East. Police reported instances of far-right groups in Poland disseminating false information regarding alleged crimes committed by individuals from Africa and the Middle East who are fleeing Ukraine.¹⁸⁰ Nils Muiznieks from Amnesty International called for robust action against racism, hate speech, and assaults. He emphasized: "The Polish authorities must ensure that all individuals who have fled Ukraine are treated with consistent respect to uphold their human rights and dignity. Racism, hate speech, and attacks cannot be tolerated, and those responsible must be held accountable."¹⁸¹

This issue of racial discrimination towards refugees has reignited concern and debate more widely, particularly in relation to experiences of diverse SOGIESC individuals, ethnic and religious minorities, and women in Poland. In recent years, certain Polish authorities have endeavoured to enact legislation that curtails diverse SOGIESC individuals' rights, including bans on discussing LGBTIQ+ issues in schools and restrictions on pride marches and events.¹⁸² These measures have been met with both domestic and international backlash, with critics contending that they infringe upon principles of equality and freedom of expression. For example, 'LGBT-free zones' declared by certain local governments¹⁸³ drew widespread condemnation from international human rights organizations as well as the EU.¹⁸⁴

Modern Slavery and Human Trafficking in Poland

Poland is a source, transit, and destination country for victims, primarily trafficked to other EU nations. In 2023, it was ranked as a Tier 2 country in the US Department of State's *Trafficking in Persons* report because despite increased government efforts to combat trafficking, they fell short of meeting the minimum standards for elimination.¹⁸⁵ Compensation and restitution for victims are rare, although the Government has raised penalties for traffickers. Funding for victim services has remained unchanged, with insufficient shelter capacity for male victims. However, the Government does support two NGOs assisting potential trafficking victims, and has taken measures to prevent trafficking related to the war in Ukraine. This includes creating a hotline and implementing procedures for unaccompanied foreign national children crossing the Poland-Ukraine border.

The third report of the Council of Europe's Group of Experts on Action Against Trafficking in Human Beings also highlights a concern regarding trafficking victims who were initially trafficked to Ukraine but subsequently fled across the Polish border. This underscores the importance of considering the heightened vulnerability of displaced individuals when implementing protective responses. Ukrainian men were known to be vulnerable to forced labour before the war. Stopping them from leaving the country may disrupt trafficking for labour exploitation abroad. It also may push men into irregular and dangerous work or migration routes and reduce the likelihood of victims of modern slavery seeking help and assistance.¹⁸⁶

Poland adopted a new national action plan for 2022-24, but the absence of a comprehensive national referral mechanism and a consistent statistical data collection

¹⁷⁹ Ibid.

¹⁸⁰ Rashawn Ray, "The Russian invasion of Ukraine shows racism has no boundaries," Brookings, 3 March 2022, <https://www.brookings.edu/articles/the-russian-invasion-of-ukraine-shows-racism-has-no-boundaries/>.

¹⁸¹ "Poland: Authorities must act to protect people fleeing Ukraine from further suffering," Amnesty International, 22 March 2022, <https://www.amnesty.org/en/latest/news/2022/03/poland-authorities-must-act-to-protect-people-fleeing-ukraine-from-further-suffering/>.

¹⁸² Rob Pciheta and Ivana Kottasová, "'You don't belong here.' In Poland's 'LGBT-free zones,' existing is an act of defiance," CNN, <https://www.cnn.com/interactive/2020/10/world/lgbt-free-poland-intl-scli-cnnphotos/>.

¹⁸³ Rob Pciheta and Ivana Kottasová, "You don't belong here."

¹⁸⁴ "EU ends legal action against Poland over anti-LGBT zones," *Notes from Poland*, 16 February 2023, <https://notesfrompoland.com/2023/02/16/eu-ends-legal-action-against-poland-over-anti-lgbt-zones/>.

¹⁸⁵ Office to Monitor and Combat Trafficking in Persons, *2023 Trafficking in Persons Report*.

¹⁸⁶ Global Initiative Against Transnational Organized Crime, *The Vulnerable Millions: Organized Crime Risks in Ukraine's Mass Displacement* (Geneva: Global Initiative Against Transnational Organized Crime, 2023). Accessible at: <https://globalinitiative.net/wp-content/uploads/2023/03/The-vulnerable-millions-Organized-crime-risks-in-Ukraines-mass-displacement-GI-TOC-March-2023.pdf>.

framework makes it challenging to assess the extent of modern slavery in the country. The number of trafficking investigations, prosecutions, and convictions in Poland has nevertheless decreased. Formal victim identification remains the responsibility of the Police, Border Guard, and National Prosecutor's Office.¹⁸⁷

Poland is divided into 16 *voivodeships* (regions/provinces), which have all established their own local stakeholder groups (regional teams) involved in the implementation of the National Action Plan Against Trafficking in Human Beings 2022-2024.¹⁸⁸ These *voivodeship* teams comprise: local authorities, law enforcement, including border police, labour inspectorates, centres for social support, prosecutors, and NGOs active at the regional level on prevention of trafficking or assistance to victims. These teams fall under the responsibility of the regional government.¹⁸⁹

Exploitation Within and Beyond Borders

Polish women and children are primarily trafficked for sex within Poland and other European countries, including France and Germany. Traffickers exploit Polish men and women for forced labour in Polish restaurant, food processing, and retail industries, and also into forced labour in Western and Northern Europe. A significant number of Polish citizens, predominately men, have been identified as victims of labour exploitation in the UK, Germany, and the Netherlands.¹⁹⁰ Recent research casts light on the gendered experience of Polish men who are modern slavery victims,¹⁹¹ suggesting that adherence to traditional gender roles ingrained in Polish society

exerts pressure on men to migrate for work in order to maintain their status as providers.¹⁹² Paradoxically, these gendered expectations can exacerbate their susceptibility to exploitative labour situations, while simultaneously discouraging them from seeking help or reporting their victimization. This reluctance to report exploitation further exacerbates their vulnerability, leading them into more hazardous situations and deeper cycles of exploitation. As such, the research encourages policymakers and frameworks addressing modern slavery to incorporate considerations of masculinity and its multifaceted effects.

Poland is also a destination for sex trafficking victims from South America and Eastern Europe, notably Bulgaria, Romania, and Ukraine. Romanian men, women, and children, especially, are recruited for forced begging in Poland, with persons with disabilities particularly at risk.¹⁹³

Research suggests that the labour exploitation of foreign individuals from Europe, Asia, Africa, and increasingly, Central and South America, within Poland is most prevalent in sectors like agriculture, manufacturing, construction, and the food industry,¹⁹⁴ sectors known for informal contracts and unclear working conditions due to the seasonal nature of the work.^{195,196} Temporary employment agencies are known to deceive migrant workers into forced labour or debt bondage.¹⁹⁷ It is noted that foreign national modern slavery victims, particularly those from outside the European Economic Area, must go through official police identification processes in Poland and rely on law enforcement support to access essential services, including financial assistance.

¹⁸⁷ Ibid.

¹⁸⁸ The Ministry of the Interior and Administration, *National Action Plan Against Trafficking in Human Beings 2022-2024* (Government of Poland).

¹⁸⁹ Suzanne Hoff, *Tackling labour exploitation in Poland, Bulgaria, and Romania* (Amsterdam: La Strada International 2019).

¹⁹⁰ Anniina Jokinen and Anna-Greta Pekkarinen, *Patterns of exploitation*.

¹⁹¹ William Shankley, "Gender, Modern Slavery, and Labour Exploitation: Experiences of Male Polish Migrants in England," *Journal of Ethnic and Migration Studies* Vol. 3 No. 5 (2021).

¹⁹² Ibid.

¹⁹³ Ibid.

¹⁹⁴ Ibid.

¹⁹⁵ Ibid.

¹⁹⁶ "General information: Situation on trafficking in human beings," European Commission, last accessed on 27 October 2023, https://home-affairs.ec.europa.eu/policies/internal-security/organised-crime-and-human-trafficking/together-against-trafficking-human-beings/eu-countries/poland_en.

¹⁹⁷ Suzanne Hoff, *Tackling labour exploitation in Poland, Bulgaria, and Romania*.

Data Challenges

Underreporting of exploitation is consistently highlighted in Poland, particularly in the context of Ukrainian refugees entering the country. A report from the University of Birmingham¹⁹⁸ cites a service provider who succinctly captures the issue:

“In Poland, underreporting is a problem, and this is also true for Ukraine. Now, picture individuals from Ukraine seeking refuge in Poland, already marginalized and under immense stress. It’s reasonable to assume that underreporting in this situation would be significant, and we might only hear isolated accounts ...”

The report further stresses that the low number of reported cases does not negate the existence of violence, trafficking, or exploitation. Rather, it signifies a complex web of barriers that prevent refugee survivors from seeking help. Despite the availability of informational resources on where to find support and accessible services tailored for refugees coming to Poland at the outbreak of war, newcomers may lack awareness. For example, individuals who do not attend refugee reception points at train stations because they entered the country in private vehicles by road may miss out on guidance. This suggests that crucial information might not have effectively reached the most vulnerable segments of the displaced population.¹⁹⁹

Additionally, the lack of private spaces in trafficking shelters, along with feelings of shame and a shortage of interpreters, dissuades victims from seeking assistance through domestic violence helplines and police channels.²⁰⁰ These combined obstacles create an environment where reporting remains a formidable challenge for those in need.

Various authorities collect data on identified trafficking victims, although there can be overlaps in figures between the Border Guard and Police, making it challenging to determine an exact victim count. The available datasets offer cross-referenced breakdowns by gender, age, and exploitation type.²⁰¹ A relatively low number of child trafficking victims are identified in data but it does suggest that a significant proportion of identified human trafficking victims are men, albeit with rates differing by reporting authority.²⁰² Border Guard data suggest that 72 per cent of victims are men, Police data suggests 56 per cent, and the National Quantum Information Centre in Gdansk (KCIK) reports assisting nearly equal numbers of women and men.²⁰³ KCIK, run by two government-funded NGOs, handle over 7,000 calls of suspected trafficking per year.²⁰⁴ KCIK shelters housed 61 victims in 2022.²⁰⁵ La Strada Foundation operates a six person shelter in Warsaw, and Polish Migrants Organise for Change Association (PoMOC) manages another shelter in Katowice, designed primarily for women and children. There are additional shelter spaces available for victims with disabilities,²⁰⁶ but availability for men appears to be limited. The *2023 Trafficking in Persons* report refers to apartments being rented for victims who do not want to be in shelters, but this may mean that men are not accessing the specialized gender-sensitive care and support that survivors require.

There is a striking gender imbalance in the anti-trafficking narrative, despite the prevalence of recorded victims who are men. The lack of sufficient focus on the male victims of modern slavery, even in key policies such as the National Action Plan for Combating Trafficking in Persons, does not reflect what is known. The data that exists indicates men are in need of protection and support, especially migrants and ethnic minorities, yet it remains an under-addressed issue.

¹⁹⁸ Sandra Pertek, Irina Kuznetsova, and Malgorzata Kot, *“Not a single safe place”: The Ukrainian refugees at risk of violence, trafficking and exploitation - Findings from Poland and Ukraine* (Birmingham: University of Birmingham 2022).

¹⁹⁹ Ibid.

²⁰⁰ KCIK operated two shelters, one for adult female victims and another for men. They also provided apartments for those who preferred them. The Government allowed victims to work and leave shelters freely, but there was insufficient shelter capacity for male victims. In 2022, the Government offered specialized shelter and housing for 61 victims (up from 54 in 2021). Victims could also access general assistance at 167 crisis intervention centers, with 16 having staff trained to help trafficking victims. KCIK arranged accommodation for 96 victims in 2022 (up from 65 in 2021).

²⁰¹ Ibid.

²⁰² GRETA, *Evaluation Report Poland*.

²⁰³ Ibid.

²⁰⁴ Ibid.

²⁰⁵ “National Consulting and Intervention Centre for the Victims of Trafficking,” Website of the Government of Poland, last accessed on 8 December 2023, <https://www.gov.pl/web/kcik-en/about-us>.

²⁰⁶ Office to Monitor and Combat Trafficking in Persons, *2023 Trafficking in Persons Report*.

Financial Inclusion in Poland

In Poland, the financial inclusion landscape has been evolving over the years with efforts to improve access to various financial services for all segments of the population.

Poland has a relatively well-developed banking sector, with a high percentage of the population having access to basic banking services. Most Polish citizens have bank accounts, which are essential for participating in the formal economy. The Government of Poland has taken steps to enhance financial inclusion. For instance, there have been efforts to digitize government disbursements, making it easier for individuals to receive social benefits and subsidies directly into their bank accounts.²⁰⁷ At present, Poland lacks comprehensive national financial inclusion and financial education strategies, despite recommendations by international organizations such as the Organisation for Economic Co-operation and Development (OECD).²⁰⁸

The rise of mobile technology and digital banking has played a significant role in improving financial access. Many people, even in rural areas, have access to mobile phones, and this has facilitated the growth of mobile banking services.²⁰⁹ The fintech sector in Poland has been expanding, offering innovative solutions for various financial services. This includes peer-to-peer lending, digital payment platforms, budgeting apps, and more. Fintech has helped reach segments of the population that might not have been served by traditional banks.²¹⁰

Microfinance institutions and microcredit programmes have been established to provide small loans to entrepreneurs and individuals who might not qualify for

traditional bank loans. These initiatives aim to support small businesses and promote financial inclusion.

In 2022, Poland received remittances totaling \$6.43 billion, constituting 0.9 per cent of its GDP. This marks a decrease from the peak observed in 2010, when remittances amounted to \$12.32 billion, accounting for 2.7 per cent of GDP. This reflects Poland's transition from being predominantly a country of emigration to becoming a preferred destination for individuals seeking enhanced living standards.²¹¹

Ukraine, in particular, has become a significant recipient of remittances, primarily from Ukrainian migrants in Poland. In 2021, Ukraine received inflows of \$18.2 billion, driven by receipts from Poland, the largest destination country for Ukrainian migrant workers. Before the Russian invasion, Ukraine was the largest recipient of remittances in Europe and Central Europe. However, in March and April of 2022, the National Bank of Ukraine recorded a 10 per cent decrease in the volume of private remittances sent to Ukraine, compared to the monthly average in 2020–2021, due to the conflict and subsequent mass displacement.²¹²

Financial Inclusion Challenges in Poland

Despite some progress, challenges of financial inclusion are noted to persist, particularly in rural and remote areas with limited physical bank access, particularly in the southern region.^{213,214} Gatnar observes the prevalence of cash payments dominating the payment system in Poland,²¹⁵ a fact not fully acknowledged by regulatory authorities aiming to increase financial inclusion. This viewpoint is reinforced by Swiecka,²¹⁶ Idzik,²¹⁷ and

²⁰⁷ Nández Alonso, Sergio Luis, Javier Jorge-Vazquez, Miguel Ángel Echarte Fernández, Konrad Kolegowicz, and Wojciech Szymła, "Financial Exclusion in Rural and Urban Contexts in Poland: A Threat to Achieving SDG Eight?" *Land* Vol. 11 No. 4 (2022): 539.

²⁰⁸ OECD, *Financial literacy in Poland: Relevance, evidence and provision* (Paris: OECD, 2022).

²⁰⁹ Ibid.

²¹⁰ Agata Klibe, Barbara Będowska-Sójka, Aleksandra Rutkowska, and Katarzyna Świerczyńska, "Triggers and Obstacles to the Development of the Fin Tech Sector in Poland," *Risks* Vol. 9 No. 2 (2021).

²¹¹ "Personal remittances, paid (current US\$ - Poland)," World Bank, last accessed on 27 October 2023, <https://data.worldbank.org/indicator/BM.TRF.PWKR.CD.DT?locations=PL>.

²¹² "Remittances in War: How Money from Abroad is Helping Ukraine," IOM, last accessed on 8 December 2024, <https://ukraine.iom.int/stories/remittances-war-how-money-abroad-helping-ukraine>.

²¹³ Maria Elżbieta Jastrzebska, "State Action Aimed at Limiting Financial Exclusion in Poland in Terms of Sustainable and Inclusive Development," *Optimum Economic Studies* Vol. 98 No. 4 (2019): 28–43.

²¹⁴ Nández Alonso et al. "Financial Exclusion in Rural and Urban Contexts in Poland: A Threat to Achieving SDG Eight?"

²¹⁵ Eugeniusz Gatnar, "Financial Inclusion Indicators in Poland," *Folia Oeconomica* Vol. 286 (2013): 225–233.

²¹⁶ Beata Świecka, Paweł Terefenko, Tomasz Wiśniewski, and Jingjian Xiao, "Consumer Financial Knowledge and Cashless Payment Behaviour for Sustainable Development in Poland," *Sustainability* Vol. 13 No. 11 (2021).

²¹⁷ M. Idzik, *Financial inclusion in Poland in the segment of young consumers* [Inkluzja finansowa w Polsce w segmencie młodych konsumentów] (Wrocławiu: University of Economics, 2016).

Szopinski²¹⁸ who emphasize the necessity of safeguarding the financial interests of the elderly, youth, and rural inhabitants among the unbanked population.

According to the study *Payment Habits in Poland in 2020* women have higher levels of financial inclusion, with 90.7 per cent owning a payment or bank account, compared to 86.1 per cent of men.²¹⁹ Account ownership is higher among persons aged 25–39 (96.8 per cent) and those aged 40–54 (97.2 per cent), but much lower than the average for persons aged 65 and over (71.4 per cent). The most frequently indicated reason for not having an account is the lack of need for having one (80.6 per cent), followed by the preference to use cash (30.3 per cent), the costs of owning an account (21.2 per cent), lack of confidence in financial institutions (17.7 per cent), and having too little income (12.5 per cent).

Szopinski's research highlights the unique needs of the elderly, youth, and individuals residing in rural areas who require tailored protection measures.²²⁰ Additionally, empirical evidence indicates that banking services provision is constrained in rural regions facing pronounced demographic pressures such as aging populations and low population densities, resulting in a heightened risk of financial exclusion. When considered against the data indicating exploitation of men in the agricultural sector, rural financial exclusion is significant.

Alonso *et al.* propose several potential solutions to narrow these disparities in Poland. Firstly, the introduction of mobile bank branches which travel to provinces to provide banking services. Secondly, improving access to cash by establishing additional cash-back points. Thirdly, exploring technology-driven solutions, including the potential adoption of a Central Bank Digital Currency.²²¹

There is a reported growing preference for online banking among younger generations.²²² While digitalization offers promise for increasing financial inclusion, online banking must be made more accessible for use by rural, older, and digitally-excluded or low digitally-literate communities.

In relation to credit, while Poland has achieved progress in enhancing credit access, specific demographics,

particularly low income individuals or those with limited credit history, persist in facing barriers to financial inclusion. A survey among Polish men highlights that awareness of financial exclusion is influenced by age and education, with higher educational attainment correlating with heightened awareness.

Media platforms, such as television, newspapers, and the internet, serve as vital channels for disseminating information about financial exclusion.²²³

OECD outline the key economic challenges in Poland at present, which will disproportionately affect financially-vulnerable populations.²²⁴ The scale of the Ukrainian refugee crisis was viewed as posing a challenge for national resources and services. The ongoing conflict in Ukraine was also acknowledged to have negatively impacted the Polish economy and increased inflation, especially since Poland has a heavy reliance on Russian imports. The cost of living crisis, food and energy prices especially, were identified to be negatively impacting vulnerable populations and heightening poverty risks. The urgency of financial education in areas such as budgeting, saving, and responsible borrowing is underscored, especially for low income and migrant/refugee populations.

The dedicated offer for Ukrainian citizens is temporary, and its duration is tied to the provisions outlined in the Act of 12 March, 2022, 'Assistance to Ukrainian Citizens in Connection with the Armed Conflict on the Territory of Ukraine,' which was adopted by the Government of Poland. This Act recognizes Ukrainian citizens' residence in Poland as legal until 24 August, 2024. Consequently, if customers wish to continue utilizing banking products beyond this date, they will need to secure the necessary documentation confirming their legal residence in Poland. This requirement is anticipated to pose significant challenges to achieving financial inclusion.²²⁵ For third person nationals these challenges have already been present as many have had challenges accessing the correct documents and have not been afforded the same rights as Ukrainian citizens.

²¹⁸ Tomasz Szopinski, "Who is Unbanked? Evidence from Poland," *Contemporary Economics* Vol. 13 No. 4 (2019): 415–424.

²¹⁹ Radosław Kotkowski, Marta Dulinicz, and Krzysztof Maciejewski, *Payment habits in Poland in 2020: Key results of the survey* (Warsaw: Narodowy Bank Polski, 2021).

²²⁰ Tomasz Szopinski, "Who is Unbanked? Evidence from Poland."

²²¹ Nájuez Alonso *et al.*, "Financial Exclusion in Rural and Urban Contexts in Poland: A Threat to Achieving SDG Eight?"

²²² *Ibid.*

²²³ Mirosław Soltysiak, "Financial Exclusion in Poland from the Male Point of View in the Light of Empirical Research," *Humanities and Social Sciences* Vol. XXV No. 27 (2020): 125–138. Accessible at: <http://doi.prz.edu.pl/pdf/einh/545>.

²²⁴ OECD, *Financial Literacy in Poland: Relevance, Evidence and Provision*.

²²⁵ World Bank, *Economic Empowerment of Forcibly Displaced Persons from Ukraine: Assessment of the Polish Legal and Regulatory Framework and the Role of the Private Sector*.

There is limited statistical information on gender for Ukrainian refugee account opening across Europe, especially for those whose lived gender identity and expressions do not match that which is on their official identity documentation.²²⁶ UNHCR underscores the paramount importance of addressing the distinctive challenges faced by the most vulnerable refugee groups, particularly those who encounter difficulties in replacing lost documentation. A recent UNHCR report highlights that a significant portion of Ukrainian refugees (25 per cent) lack essential legal documentation, thereby creating significant barriers to accessing vital services. This creates considerable challenges for individuals with disabilities and older people in accessing critical services such as healthcare, housing, and employment.²²⁷ Financial institutions were identified as needing to ensure that the absence of documentation does not become an insurmountable obstacle to vulnerable persons' access to financial inclusion.²²⁸

Poland Case Study

Interviews: Findings

Individuals from various organizations in Poland, including civil society and financial service providers explored critical issues related to human trafficking, financial inclusivity, gender disparities, and the unique challenges faced by diverse men in crisis situations. Below are some of the key themes and insights drawn from their conversations.

Anti-Trafficking Policies and Gender

A notable critique that emerged from the interviews centred on the inadequacy of current anti-trafficking policies and mechanisms in addressing the trafficking of men. The absence of gender sensitivity in anti-trafficking efforts is commonly reflected in interviews which raise the tendency for policy and social narratives as well as institutional practice to primarily focus on women as victims. This gender imbalance is felt to result in insufficient resources and support for trafficked men. The idea of 'degendering' policies is even explored in one interview, where it is suggested, this may be a

more equitable approach to the needs of both men and women. This indicates low awareness of gender sensitivity or gender responsiveness in practice.

Interviewees, especially those representing NGOs, consistently highlighted the scarcity of resources, organizations, and institutions in Poland that are exclusively dedicated to combating human trafficking. Their reliance on the sole trafficking organization operating in the country illuminated the organization's overwhelming workload and led to NGOs feeling they had a limited network and avenues of support. Consequently, there was a unanimous call for intensified awareness-raising initiatives aimed at government officials, emphasizing the pressing need to bridge the existing gap in understanding and responding to men's needs.

Several interviewees articulated concern that gender-sensitive intervention strategies and policies for anti-trafficking, although they would be helpful, may not align with Poland's political environment where homophobic and racist views were expressed and women's rights were in reverse. They also expressed the view that often GBV, CRSV, and similar policies appear to be externally imposed without clear guidance on their practical application for diverse men. Interviewees observed that these policies sometimes serve more as 'checkboxes' to secure funding from 'Western' donors rather than providing actionable guidance for specific situations.

Vulnerabilities and Challenges Faced by Diverse Men

The interviews delve into how the cultural and gender norms of the country of origin and country of location contribute to male victims being underrecognized. Conventional constructs of masculinity and stereotypes of men as invulnerable are viewed as discouraging men from sharing their experiences of victimization and seeking help:

"To what extent can the Ukrainian male be weak? I think not at all, in this context, at the moment, there is no room for this in the image and expectations of both the society, well the Polish society, where he

²²⁶ Leona Vaughn and Simon Zaugg, "Strengthening Financial Inclusion to Protect Against Modern Slavery: Applying Lessons to Bank Forcibly Displaced Persons/Refugees."

²²⁷ "Acute needs of older Ukrainian refugees and those with disabilities must not be overlooked," UNHCR, 27 April 2023. Accessible at: <https://www.unhcr.org/news/acute-needs-older-ukrainian-refugees-and-those-disabilities-must-not-be-overlooked>.

²²⁸ UNHCR, *Displacement Patterns, Protection Risks and Needs of Refugees From Ukraine* (2023).

comes and he should come and work or fight in the war, well the women who have been waiting for them here, I also suspect they will rather expect him to get on and not when. To what extent is there a lack of space to support individuals with diverse, non-heteronormative identities? It appears to be virtually non-existent."

During the interviews, significant vulnerabilities among various groups were uncovered, highlighting pressing issues. Interviewees underscored the extensive vulnerability experienced by men, including those from diverse SOGIESC communities, ethnic or national minorities, and other diverse backgrounds, who are susceptible to exploitation across various domains, such as labour and physical work. These risks are elevated, with some also grappling with challenges related to addiction, homelessness, and mental health, and encountering a lack of resources and assistance.

Notably, the interviews revealed a pattern of labour exploitation targeting men, particularly those of African descent. Deception consistently emerges as a central theme, with vulnerable men unknowingly ensnared in trafficking schemes often involving cross-border movements in harsh conditions.

The interviews also spotlighted the vulnerability of the Roma refugee community. Although Roma are officially estimated to comprise between 200,000 and 400,000 individuals in Ukraine, it is thought that these numbers could be much higher. This community contends with pervasive exclusion, poverty, and social disadvantage, particularly in regions like Transcarpathia and eastern Ukraine.²²⁹ Gender roles and hierarchies within the Roma community were felt to significantly influence how vulnerabilities and instances of violence are perceived and reported. Patriarchal norms and societal structures were viewed as compounding the difficulty for both men and women to engage in conversations about challenging topics and emotion.

It is known that racism, xenophobia, and discrimination increases vulnerability to targeted exploitation.²³⁰ Interviewees noted the significance of including the experiences and vulnerabilities of men, especially from marginalized groups, to trafficking in this setting. Interviewees touched on the challenges faced by trafficking victims from different gender and cultural

backgrounds and the importance of understanding these dynamics when providing assistance, stating there was a need for more comprehensive policies in this regard.

Racial discrimination was a repeated feature in interviews with civil societies regarding victims' and refugees' access to fundamental resources, including financial services. A prevailing perception emerges that humanitarian support tends to downplay the racial dimension, thereby diminishing its effectiveness. Within the broader scope of anti-trafficking initiatives, interviewees observed a disregard of race in humanitarian policies and measures. As one interviewee points out: "Whenever we brought up race in our interventions during the Ukraine crisis, it was often marginalized." This was felt to reinforce the environment wherein specific vulnerable groups, notably men of African descent, lack sufficient protection from discrimination and crime. As one interviewee notes when reflecting on the intersection between international and national agenda setting:

"There's a racial component to trafficking, that is never really talked about. For instance if you take the OSCE framework, so they work with governments to develop anti-trafficking mechanisms. But there's never been a racial component towards it. So, if they're informing governments and their structures and then these are implemented in reality, then you know for sure they're not talking to Black folk. Or they're not focusing on Black folk...you're talking about improving mechanisms, but you haven't reached out to the people who are vulnerable and susceptible to it. So, there's no racial component and there is definitely no gender thing ... it's about women."

Lack of Specific Services for Diverse Men

The interviews emphasized the significance of addressing cultural and language barriers to respond effectively to trafficking cases. Many men, due to cultural taboos, shame, or fear of stigma, were said to refrain from disclosing their victimization. Additionally, language barriers were reported to hinder communication between victims and authorities, preventing access to vital support and assistance, especially for linguistic minority communities such as Roma people.

²²⁹ Elżbieta Mirga-Wójtowicz, Joanna Talewicz, and Małgorzata Kołaczek, *Human rights, needs and discrimination: The situation of Roma refugees from Ukraine in Poland* (Heidelberg: Central Council of German Sinti and Roma, 2022).

²³⁰ OHCHR, "Racism and xenophobia put human rights of human trafficking victims at risk – UN expert," 29 July 2021.

Men facing crises – financial, health, crime, homelessness, or abuse, especially those from diverse backgrounds such as the Roma and Muslim men – were observed to have few to no options for support. Notably, an NGO provider anticipates a growing demand for male-focused support, particularly as more men arrive in Poland due to the ongoing conflict in Ukraine. In reference to the case of a Ukrainian man suffering from alcohol abuse who was reported missing, the lack of resources are noted:

“I’m kind of anticipating that these situations are going to pile up at the moment, because it seems to me that while women know that there are these places where they can come for help, this man, being a man, clearly in an alcohol crisis probably didn’t know where to seek help, right?... so now, well, I think there will be a big need for male support. And as if we were to ask now, organizations supporting men ... Apart from the Brother Albert Society, which deals with just homeless people in Poland, I can’t name any, to tell you the truth.”

The interviewee perceives this as a double standard for women and men:

“Well, it’s just that if we don’t define it in such a way that it’s still a crisis, an alcoholic illness, and therefore he needs support, well, he’s already a total outcast, yet, if a woman manifests symptoms of this kind, there is a whole system in place to support her, to help her out of this crisis. In the case of men, well, it’s rather there is simple condemnation.”

During one interview an important point on intersectionality and organizational support was raised, when discussing the psychological support offered to ‘Black’ and other racialized minorities, people with disabilities, and diverse SOGIESC people fleeing Ukraine. The interviewee felt that the few organizations supporting marginalized people in Poland, whilst expert in their own respective areas, may not have possessed the necessary skills or knowledge to effectively address the issue of racial trauma in the context of the other identities refugees may hold. Going forward the interviewee notes that when crafting gender-responsive policies or support mechanisms the intersection of racial trauma, financial exclusion, and trafficking experiences need to be explored.

Financial Vulnerability and the Informal Economy

Interview discussions covered the range of challenges faced by men when attempting to open bank accounts. Of particular focus was the experience of Ukrainian men of conscription age now living in Poland. One interviewee highlighted that many of these individuals either could not or chose not to open bank accounts due to fears of conscription by the Government of Ukraine and a lack of trust in the formal financial system. This concern was substantiated by an organization conducting interviews on financial exclusion in Moldova. This organization discovered that men who were interviewed and unbanked opted to avoid formal financial programmes. The understandable reluctance to access the formal system highlights their inherent risk of further isolation and increased vulnerability to exploitation. These men avoid formal financial transactions, including formal employment, and may need to resort to informal and unregulated financial services.

Interviews observed that some individuals, particularly men, resort to unconventional financial practices due to their limited access to formal banking services. This was said to include turning to cryptocurrencies or engaging in unregulated online transactions, as alternatives for managing their finances. One interview highlighted that these unconventional financial solutions carry inherent risks, potentially exposing these individuals to financial fraud and scams. Another underlined the significance of expanding access to formal payment methods as a means of addressing this issue.

Tailoring services to the individual came up as one way to expand financial inclusion for the different groups that were seen as vulnerable to trafficking. One interviewee suggested learning from the practice of the National Bank of Moldova; the bank had established financial services centres in areas where women were located to facilitate ease of use.

Financial inclusivity is also discussed in the context of support for trafficking victims returned to their country of origin, either to Poland or from Poland. One interviewee highlighted the challenges faced by trafficking victims when they return, including the need for services to provide financial reintegration and support to ensure they are not left destitute and open to re-exploitation.

One interview highlighted the specific impact of racism on financial vulnerability, especially in application processes for business bank loans. Individuals of African descent

were noted to often confront a financial framework that curtails their aspirations. A call to action resonates throughout the interviews, urging the rectification of both racial and gender disparities, and the promotion of an equitable approach to financial inclusiveness.

A Path Forward

The insights from the Poland case study shed light on the vulnerabilities and challenges faced by diverse men in the country, namely displaced persons, refugees, migrants, and marginalized communities such as diverse SOGIESC individuals, people with disabilities, and homeless people. The discussions emphasized the need for comprehensive gender-responsive policies, greater awareness of modern slavery and financial exclusion, greater collaboration, and policy reforms to address the support and protection of vulnerable groups more effectively.

Using Intelligence on Modern Slavery to Inform Protection Responses in Crisis

The interviews highlighted that although very likely underreported, there was significant knowledge on existing forms of modern slavery and the demographics of the victims. However, this knowledge was not being used to shape gender-inclusive protection responses. Interviews underscored the necessity of research and other evidence-based approaches to comprehensively address the challenges faced by diverse men.

Collaboration and Network Building

Increased collaboration among organizations, including NGOs, government agencies, and international entities, was seen as essential for effectively combating human trafficking and promoting financial inclusion. However, the existing anti-trafficking infrastructure needs additional resources and enhanced integration. Networking and partnerships between Polish and Ukrainian organizations were deemed vital to provide comprehensive support to men fleeing that crisis.

Strengthening Protection at the Border

The interviews highlighted the importance of training border guards and law enforcement personnel to recognize potential trafficking cases through enhanced understanding of modern slavery experiences and vulnerabilities, especially concerning men. There is also a role to actively implement protective measures for vulnerable people on the move. Equitable and respectful treatment for all individuals who encounter border and law enforcement authorities was a universal call.

Addressing Service Gaps for Diverse Men

Throughout the interviews it became unmistakably clear that there is a glaring absence of organizations and services tailored specifically to address the unique needs of men vulnerable to modern slavery during a crisis. Interviewees identified the interconnectedness of trauma from discrimination, drug and alcohol addiction, mental health challenges, and homelessness, and how these conspire to make men, especially marginalized men, vulnerable to exploitation and abuse.

Case Studies: Identified Barriers to Financial Inclusion for Diverse Men in Crisis/Conflict Situations

- 1. Gender biases and stereotypes:** Stereotypes of 'traditional' gender roles and social norms in different contexts create barriers for men, as well as women, in accessing financial services. This can intersect with additional stereotypes or bias related to race, culture, sexual orientation, disability, religion, or citizenship status.
- 2. Regulatory barriers:** For men in situations of conflict/crisis who are migrants, refugees, or trafficking survivors in a third country, a lack of regulatory guidance can inhibit their financial access.
- 3. Limited official documentation:** Many diverse men in humanitarian settings may lack the necessary identification documents or proof of address required to open bank accounts or access financial services (customer due diligence/KYC). This lack of documentation may be because they are a trafficking survivor. Survivors may be reluctant to share details for fear of being located by traffickers. The fear of military conscription may also be a barrier to men seeking financial access. There are additional barriers for those whose documented birth sex does not match their lived gender identity or expression.
- 4. Lack of tailored services:** Financial institutions and humanitarian organizations often design financial inclusion programmes, products, and services with a focus on women's empowerment, which won't always meet the specific needs and circumstances of diverse men.
- 5. Employment and income instability:** Challenges in finding stable employment opportunities or sources of income, or not being allowed to do so, can make it difficult for diverse men to engage with formal financial systems and impede their ability to save, invest, or access credit which can offer resilience to exploitation.
- 6. Low awareness of financial system:** Limited access to information on financial rights or a lack of financial literacy in crisis settings can hinder men's ability to navigate financial systems effectively and leave them open to financial abuse and exploitation.
- 7. Inadequate infrastructure:** In humanitarian settings, the lack of physical and digital infrastructure can limit access to financial services. A lack of bank branches or ATMs, as well as limited digital connectivity and technological resources, can hinder those most vulnerable to abuse, including marginalized men, from engaging with physical and digital financial access solutions offered during a crisis.

Discussion

The literature review, key stakeholder interviews, and case studies highlight some repeating themes that need to be addressed to make financial inclusion an integrated part of gender-responsive anti-slavery protection efforts that meet the needs of diverse men in crisis/conflict situations.

Binary Vision

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

This report sheds light on the impact of gendered perceptions on vulnerability to trafficking and modern slavery. These perceptions tend to oversimplify men as potential perpetrators or as unworthy of attention, while women are often cast solely as victims, overlooking the intricate intersections of various identities, such as disability and age. This one-dimensional approach neglects the complexities of these diverse identities and fails to address the unique needs and vulnerabilities of individuals, including men. Deep-seated gender biases and stereotypes can pose significant barriers to recognizing men as victims of trafficking. Consequently, this hinders the accurate identification of men who are victims of modern slavery and restricts their access to essential assistance and protection services.

The case studies included in this report highlight how discrimination against minority groups obstructs the accurate identification of victims who are men, especially from diverse backgrounds. For instance, Poland's humanitarian response efforts exhibited clear racial bias, resulting in negative treatment of refugees who were not 'White' or Ukrainian nationals. Similarly, Haitian migrants encounter documented instances of racism in countries like the Dominican Republic and Brazil, which has prevented them from being treated as victims of abuse and exploitation in many instances. Marginalized individuals frequently experience economic, social, and political exclusion, making them prime targets for exploitation. Poverty and limited access to education, healthcare, and stable employment opportunities often force people into desperate circumstances, making them more susceptible to traffickers.

While financial exclusion wasn't explicitly linked to discrimination in these case studies, it undeniably has the potential to significantly affect the quality of services provided in humanitarian settings. It's essential to recognize the extensive body of literature emphasizing the connections between financial exclusion and racial disparities, both broadly²³¹ and within humanitarian contexts.^{232,233,234} Current research demonstrates that racial and ethnic minorities often suffer disproportionately during humanitarian crises. They are more likely to reside in vulnerable areas, lack access to quality healthcare and education, and have limited economic resources.

²³¹ Kristen Broady, Mac McComas, and Amine Ouazad, "An analysis of financial institutions in Black-majority communities: Black borrowers and depositors face considerable challenges in accessing banking services," Brookings, 2 November 2021, <https://www.brookings.edu/articles/an-analysis-of-financial-institutions-in-black-majority-communities-black-borrowers-and-depositors-face-considerable-challenges-in-accessing-banking-services/>.

²³² House of Commons International Development Committee, *Racism in the aid sector: Government response to the Committee's first report* (London: House of Commons, 2022).

²³³ Michael Leger and Danisha Kazi, "Beyond Financial Inclusion, We Need Racial Economic Justice," *Positive Money*, last accessed on 8 December 2023, <https://positivemoney.org/2020/08/beyond-financial-inclusion-we-need-racial-economic-justice/>.

²³⁴ Munacinga Simatele and Martin Kabange. "Financial Inclusion and Intersectionality: A Case of Business Funding in the South African Informal Sector," *Journal of Risk and Financial Management* Vol. 15 No. 9 (2022).

This vulnerability makes them more susceptible to the adverse economic impacts of disasters or conflicts. Racial minorities, particularly in lower-income communities, may face restricted access to traditional banking and financial services, hindering their ability to save, access credit, or obtain insurance, thereby reducing their resilience to financial shocks caused by crises. Discriminatory practices within financial institutions, such as redlining, predatory lending, and other forms of financial exploitation, compound the challenges faced by racial minorities.

The connections between contemporary forms of slavery and racial discrimination based on race, colour, descent, and national or ethnic origin are indisputable. As noted in a report by the UN Special Rapporteur on Slavery:

“Deep-rooted and systematic discrimination, often stemming from historical legacies such as slavery, colonization, systems of inherited status, and formalized state-sponsored discrimination, render minority communities vulnerable to contemporary forms of slavery.”

These links underscore the heightened risks faced by marginalized groups, increasing their susceptibility to becoming victims of contemporary slavery. Consequently, there is a need for further exploration and research into the relationship between financial inclusion, gender, race, and modern slavery in crisis settings.

Perceptions of ‘Gender’ in Anti-Slavery/Trafficking and Financial Inclusion Policies for Conflict and Crisis Situations

There is 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. This would go beyond the binaries of biological sex, to include diversity of gender identity and expression. Our research 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 GBV and CRSV. These insights may assist in developing gender-sensitive protection policies and approaches to challenge harmful concepts of masculinity and promote inclusivity, without diverting attention and resources from women and girls.

A lack of awareness and attention to the unique risks and protection needs for diverse men and gender-diverse individuals during crises, was revealed in this study, both

in practice and at the international policy and donor levels. 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. Interviewees in both the case studies and key stakeholder interviews noted that international conventions and protocols tend to emphasize women and children as the primary victims of trafficking due to the specific language within these agreements. This, in turn, influences national agenda-setting. Funding institutions also significantly shape priorities and actions. However, interviewees in Haiti stated that funders of anti-trafficking work do not include issues affecting men and boys. In Poland, gender-sensitive 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 gender identity.

As a forward-looking recommendation, there is a need to enhance awareness among policymakers, donors, and the international community regarding the specific risks faced by diverse populations, thereby facilitating the prioritization of resources and attention. It is evident that a more inclusive and nuanced approach is needed to address gender vulnerabilities on the international stage. This includes recognizing the diverse risks faced by all genders, addressing the gaps in anti-trafficking frameworks, and ensuring that policies are contextually relevant and practical.

In adopting a transformative and responsive gender approach, several key principles and strategies emerge. First and foremost, addressing gender biases requires a fundamental shift in how data is collected, monitored, analysed, and disaggregated. This data-driven approach, actively involving diverse voices in programme design and execution, will assist in highlighting existing gender disparities and guide targeted interventions.

Moreover, there is a need to drive positive transformation by engaging with men and gender-diverse individuals. This engagement serves as a pivotal means to confront harmful concepts of masculinity and reshape entrenched gender norms within communities. Importantly, such efforts would not only benefit men but also yield positive impacts for women and girls. This underscores the imperative of adopting a gender-transformative and responsive approach to achieve broader societal benefits.

Furthermore, recognizing the importance of gender sensitivity and intersectionality is a critical theme. Gender roles intersect with other identity aspects, such as disability, age, and sexual orientation. This nuanced

understanding is essential for accurately addressing vulnerabilities, as it enables tailored interventions that cater to the specific needs of diverse individuals. In essence, adopting intersectional perspectives ensures that prevention and protection mechanisms are inclusive and effective, and leave no one behind.

Lastly, it is significant to incorporate gender considerations into the design and implementation of anti-slavery/trafficking and financial inclusion programmes. While financial inclusion initiatives reportedly prioritize a non-discriminatory approach, gender-specific vulnerabilities and needs must also be factored into the equation. Recognizing the multifaceted nature of the gender dimension within financial inclusion remains a critical area of consideration and potential exploration. Ultimately, embracing a transformative gender approach involves a comprehensive re-evaluation of practices, policies, and perspectives to ensure greater equity and inclusivity in financial inclusion efforts for all genders.

Missed Opportunities

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

Including diverse men in humanitarian efforts can be achieved without diverting attention and resources from women and girls in all their diversity. It is possible to create an inclusive environment that supports the empowerment of people across all identities, contributing to the development of resilient communities. Comprehensive programming should address the diverse needs of individuals while promoting gender equality, recognizing and addressing the distinct risks faced by each gender, and actively engaging diverse men.

The research found there to be limited integration of an anti-slavery and trafficking lens into conflict and crisis protection responses for diverse men, as highlighted in a recent global protection cluster report that examined funding priorities and delivery.²³⁵ It is evident that geographic areas profoundly affected by protection risks may not always receive commensurate levels of support, particularly concerning issues like trafficking

in persons, forced labour, or slavery-like practices. For instance, countries such as Colombia, Mali, Mozambique, Myanmar, South Sudan, Ukraine, and Venezuela face substantial risks in these areas, but only a small fraction of the protection response is directed towards addressing these issues.²³⁶

In the context of concerns surrounding trafficking risks during humanitarian crises, our interviewees consistently emphasized the persistent lack of concrete evidence and data, which significantly impedes informed decision-making. Comprehensive and disaggregated data is pivotal in gaining a nuanced understanding of the risks experienced by various groups. These data gaps not only hinder evidence-based decision-making but also curtail our ability to design effective policies. Existing monitoring and evaluation systems often fall short in capturing data specifically related to anti-trafficking responses for diverse men. Interviewees highlighted a pressing need to enhance data collection methods and address gender biases inherent in data gathering practices. An especially concerning omission is the failure to monitor and evaluate the intersection of CRSV and sexual slavery, a gap that urgently requires rectification.²³⁷

Moreover, the use of the term 'trafficking' in policies and responses may restrict the effectiveness of interventions in conflict and crisis settings. Addressing broader definitions of modern slavery is crucial for a comprehensive 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 broadly and more specifically in conflict and crisis situations. In numerous instances, victims of trafficking, particularly those who are vulnerable and susceptible, find themselves operating within the informal economy due to a myriad of barriers they face. These challenges are often centred around accessing formal financial institutions, which can potentially make them more

²³⁵ Global Protection Cluster, "Protection Funding: Where Do we Stand in 2023?" (UNHCR, 2023). Accessible at https://www.globalprotectioncluster.org/sites/default/files/2023-10/gpc_protection_funding_report_final.pdf.

²³⁶ Ibid.

²³⁷ "The UK's Preventing Sexual Violence in Conflict Initiative and the G7," The House of Commons library, 14 June 2021, <https://commonslibrary.parliament.uk/research-briefings/cdp-2021-0087/>.

susceptible to exploitation. There is a need to explore and develop effective interventions that promote financial access and inclusion more broadly, considering the evolving practices in this area

Identifying synergies and areas of alignment through the integration of an anti-trafficking/modern slavery lens into relevant policies is a crucial step towards a more comprehensive and effective approach to combating human trafficking. For instance, if governments integrated an anti-trafficking perspective into their financial inclusion strategies, they not only have the potential to promote economic development but also to identify and mitigate the financial vulnerabilities that can make individuals more susceptible to trafficking. Whilst it is promising to observe an increasing number of countries contemplating the integration of forcibly displaced persons into their strategies, recognizing that these groups may be vulnerable to trafficking and exploitation would greatly enhance the effectiveness of these provisions.

Similarly, embedding an anti-trafficking lens in crisis preparedness and response measures is essential to safeguard displaced populations from exploitation and trafficking during times of crisis. By prioritizing prevention, protection, and prosecution measures within national action plans, governments can provide a comprehensive response that addresses the vulnerabilities and risks faced by individuals in these contexts, whilst also utilizing financial inclusion as a tool to protect victims. Exploring the link between climate change, environmental damage, and modern slavery has started, but the role of financial inclusion in preventing and supporting modern slavery victims remains unexplored. Inclusive disaster risk management must recognize these interconnected issues to combat human trafficking during the aftermath of disasters and the recovery phase.

To support the successful implementation of these policies, it is crucial to establish a comprehensive national framework that involves collaboration among the financial sector, government agencies, and CSOs. A well coordinated national referral mechanism, led by national governments, must be in place to ensure that victims receive the necessary support and protection. However, to function optimally, CSOs require adequate resources, including funding, to play their vital role in victim assistance. For instance, in initiatives like the Survivor Inclusion Initiative – a FAST project that unites

financial institutions and survivor support organizations – a majority of referrals originate from CSOs.

Unfortunately, these organizations often face funding shortages. Therefore, when considering financial access as an integral part of a humanitarian response to crises or conflicts, it is paramount to ensure robust support for the infrastructure of CSOs. This support is essential to enable them to provide vital assistance to victims effectively.

UN agencies, including UNHCR, have the potential to facilitate dialogues and support financial inclusion efforts for diverse men during humanitarian crises. However, it is evident that the current UN and cluster systems do not adequately address the specific vulnerabilities faced by diverse men in these contexts. Humanitarian crises pose unique challenges due to disrupted infrastructure, resource scarcity, and heightened vulnerabilities. UN cluster systems serve as coordination mechanisms, yet there is a pressing need for them to become more inclusive and responsive to the distinct needs of diverse populations to ensure that no group is overlooked. It's worth noting that several stakeholders are actively engaged in various global protection cluster groups. Nevertheless, there is limited awareness of activities related to the anti-trafficking group, especially within the context of the response to the Ukraine crisis.

Nurturing crucial multi-stakeholder cooperation is deemed essential for effective solutions. This involves engaging a wide array of stakeholders, including the UN, governments, financial institutions, and investors. It's imperative to emphasize the significance of raising awareness regarding the intricate relationship between financial inclusion and the prevention of exploitation.

The necessity of collaboration between various stakeholders, including government entities, regulatory bodies, financial institutions, and non-governmental organizations, was underscored. Effective financial inclusion programmes require a concerted effort to pool resources, share insights, and develop comprehensive strategies. By working together, these sectors can create holistic solutions that address both the immediate and long-term needs of vulnerable individuals, enabling them to recover and rebuild their lives with resilience.

Efforts to integrate a more focused anti-trafficking response into international platforms, such as the GPC, can also contribute to addressing these gaps. Even if slavery/trafficking does not become a designated 'Key

Area of Responsibility' within the GPC, ongoing efforts should continue to foster greater synergy across policy areas and international initiatives, including those like the Platform for Disaster Preparedness and the UN's Global Compacts for Migrants and Refugees.²³⁸

In summary, the integration of an anti-trafficking/modern slavery lens into financial inclusion policies represents a strategic approach that enhances the ability of governments and international organizations to combat human trafficking comprehensively. By aligning policies and actions across various sectors, we can better protect vulnerable individuals, promote their rights, and work towards a more inclusive and secure global community.

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

While there is a substantial body of empirical knowledge regarding the vulnerability of women and girls to modern slavery, there exists a significant dearth of information concerning diverse male victims. This data deficiency not only hampers our ability to provide adequate support to male trafficking victims, but also leads to a potential underestimation of the issue's true scale, with significant consequences for adult male survivors. Significant knowledge gaps were shown to exist for all sectors, which create obstacles to addressing this challenge. Vulnerability monitoring data gaps, gaps in intersectional knowledge about men's modern slavery experiences, and gaps in inclusive protection responses in these settings were commonplace.

The research did, however, observe an increasing acknowledgement in humanitarian and anti-slavery policy and practice, that more needs to be known about diverse men's experience of, and vulnerabilities to, trafficking 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, alongside an acknowledgement that women face 'greater' vulnerability in these settings, which is why traditionally they have been the main focus of attention. The financial sector or, more specifically, the financial inclusion space, was, however, significantly less sensitized to the role of financial access interventions to reduce modern slavery, especially for men.

The absence of tailored policies, laws, and support services exacerbates their vulnerability. This short scoping study revealed significant gaps in service provision for diverse men facing conflict and crisis situations.²³⁹ In both case studies, interviewees consistently highlighted the scarcity of essential services, such as shelter in the case of Poland, and organizations dedicated to assisting male victims. These deficiencies often stem from a lack of awareness regarding the unique needs of men in such situations, as well as the prevailing prioritization of women and girls.

One area consistently mentioned was the dearth of mental health provision. In both case studies, we observe a connection between mental health and financial vulnerability. In Haiti, it was observed that economic insecurity and crises drove men to adopt risky coping mechanisms, notably alcohol.^{240,241} Similarly, in Poland, a parallel trend emerged, with men suffering from an alcohol use disorder, in part, as a perceived response to economic challenges, intensifying their sense of insecurity and vulnerability. It's important to note that the lack of specialized services, such as mental health and psychological support, further compound these issues, acting as a barrier that prevents men from accessing the assistance they require.

Human trafficking and financial insecurity significantly impact mental well-being, especially in relation to societal attitudes regarding male gender roles. Trafficking, a form of extreme exploitation, causes trauma and can lead to conditions like post-traumatic stress disorder, depression, anxiety disorders, and substance abuse in survivors.²⁴²

²³⁸ "Multistakeholder Pledge: Protection for refugees and migrants at risk of or affected by trafficking in persons," UNHCR, last accessed on 8 December 2023, <https://globalcompactrefugees.org/multistakeholder-pledge-protection-refugees-and-migrants-risk-or-affected-trafficking-persons#:~:text=Pledge%20description,the%20Global%20Compact%20for%20Refugees>.

²³⁹ C. Nicole White & Katherine Robichaux "Factors Related to Psychiatric Hospital Readmission for Survivors of Human Trafficking," *Journal of Human Trafficking* (2022). Accessible at: [10.1080/23322705.2022.2139490](https://doi.org/10.1080/23322705.2022.2139490).

²⁴⁰ World Bank Group, *Haiti's Untapped Potential*.

²⁴¹ Ibid.

²⁴² Sukran Altun, Melanie Abas, Cathy Zimmerman, Louise M. Howard, and Sian Oram, "Mental health and human trafficking: responding to survivors' needs," *British Journal of Psychiatry International* Vol. 14 No. 1 (2017): 21–23.

Likewise, financial instability, including factors such as poverty, unemployment, or debt, can result in chronic stress, anxiety, depression, and even suicidal thoughts.²⁴³ Additionally, those experiencing severe crisis situations such as climate change disaster-related events and conflict situations often suffer from mental health-related challenges.²⁴⁴

Traditional male gender role expectations exacerbate these challenges. Men often face stigma when seeking help for mental health issues or admitting vulnerability. The pressure to be providers for their families makes financial difficulties particularly distressing, threatening their sense of masculinity. Additionally, male trafficking survivors may be reluctant to disclose their experiences due to fears of appearing weak. Toxic masculinity norms, including suppressing emotions and using violence as a coping mechanism, worsen mental health issues and hinder recovery.

Unfortunately, research on the intersection of human trafficking and financial vulnerability, and their impact on mental health, especially for male survivors, is limited. Efforts are emerging,²⁴⁵ but the topic of financial vulnerability remains underexplored, especially in terms of gender.

To address these issues effectively, we must take a comprehensive approach, including destigmatizing mental health, promoting gender-inclusive support services, and challenging harmful traditional gender norms that discourage help-seeking behaviour. This is crucial for male survivors facing unique obstacles rooted in societal expectations and gender roles.

The interviewees underscored the importance of engaging with men and gender-diverse individuals as a means to confront harmful concepts of masculinity and reshape gender norms within communities. Moreover, they contend that such efforts will yield positive impacts for women and girls, underscoring the need for a gender-transformative approach.

To facilitate evidence-based policymaking and programmatic interventions, it is imperative that we enhance our capabilities in monitoring, data collection, and analysis concerning the trafficking risks faced by diverse men in conflict and crisis settings. To address these gaps, gendered notions of vulnerability and protection in both policy and practice need to be overcome. Within this, intersectional identities should be acknowledged and addressed, especially for men of all ages, gender identities and expressions, ethnicities, citizenship status, disabilities, and sexualities. Understanding how financial vulnerability influences the way diverse men experience modern slavery in conflict and crisis situations will help inform efforts that integrate financial inclusion into protection responses and better identify more comprehensive and inclusive needs-based protection responses for all.

²⁴³ Soomin Ryu and Lu Fan, "The Relationship Between Financial Worries and Psychological Distress Among US Adults," *Journal of Family and Economic Issues* Vol. 44 (2023): 16–33.

²⁴⁴ Courtney Welton-Mitchell and Leah Emily James, "Evidence-based mental health integrated disaster preparedness in Nepal and Haiti," *Humanitarian Practice Network*, 5 July 2018, <https://odihpn.org/publication/evidence-based-mental-health-integrated-disaster-preparedness-in-nepal-and-haiti/>.

²⁴⁵ World Health Organization, *Addressing human trafficking through health systems: a scoping review* (Copenhagen: WHO Regional office for Europe: 2023).

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