

20 January 2023

The Hungarian Helsinki Committee (HHC) is, and has always been, the only entity in Hungary to provide large-scale, free-of-charge professional legal assistance to refugees, asylum-seekers and stateless persons. Since 24 February 2022, the HHC has been the sole provider of legal information and direct legal assistance in protection-related matters to those fleeing because of the Russian invasion of Ukraine, in cooperation with and as the implementing partner of the UNHCR. In the framework of its Ukraine refugee crisis response, by 15 December, the HHC provided legal assistance to 8 335 persons of concern, among which to 4 344 in person, 2 190 by email, 1 084 over the phone and 717 in messaging application. We also answered 115 legal queries by partner organisations. HHC teams have been constantly monitoring reception facilities where Ukrainian refugees are accommodated in the border area, in Budapest and elsewhere in Hungary since the very beginning of the Russian invasion of Ukraine. The information provided in this paper is based on this experience.

For further information (tailored multilingual information leaflets, legal updates, statistics, etc.), see the HHC's dedicated landing page at: <https://helsinki.hu/en/ukr/>

Complaints about severe human exploitation (slavery, servitude, forced labour, trafficking, particularly exploitative labour conditions, child work, etc.) are not among the 'typical' human rights issues regularly monitored by the HHC. However, in our Ukraine refugee response, we received some related complaints by email or other communication channels. Throughout 2022, we observed some reports of **unfair labour conditions** by applicants or beneficiaries of temporary protection who started to work in Hungary. Most reports complain about an **unfair salary** (e.g. receiving a substantially lower salary than agreed beforehand) or the fact that persons are **employed without a contract**.

During the HHC's monitoring visits conducted in March-December 2022, the following examples were shared with the HHC that can shed light on potential exploitation patterns related to the refugee crisis:

- ◆ Two sisters from Kyiv informed us that every evening a Hungarian woman from Zakarpattia talked to them and offered them work, asking them to sign papers. The sisters did not find this woman trustworthy and felt intimidated by her.
- ◆ Several women, encountered during several monitoring visits informed us that they were given job offers by online recruiters, who also offered them housing. Many of them found these job offers through a leaflet placed at their accommodation facility advertising a company called 'Safe in Hungary' (www.safeinhungary.hu). One woman informed us that the recruiters had told her that she could work for them, but her 20-year-old daughter would have to work too and, for this, she should stop her studies. After a background check, the HHC found this dubious recruitment campaign concerning. It was particularly worrying that the for-profit recruitment agency was posing as a humanitarian actor offering 'help', which was at odds with its actual character and motivation. Also, it was clear for HHC monitors that Ukrainian refugees lacked proper information and could be easily misled by these job offers that may not give them the same rights and choices as registering for temporary protection would. It appeared that accepting job offers from this company could 'divert' refugees from acquiring temporary protection and put them in a more vulnerable situation with an elevated risk of exploitation. (March 2022, Helping Points and accommodation centres in the border area) – An investigative journalism portal later published an [article](#) revealing the close ties of this company to the Hungarian government, which can explain their exclusive placement at Helping Points on the Ukrainian-Hungarian border.

- ◆ Some Ukrainian refugees complained of being employed without the necessary permits by a company called 'Prohuman' (which is the one mentioned under the previous point, operating the www.safeinhungary.hu website). A woman informed us that her uncle who worked for this company did not have any residence permit and that the company refused to initiate the relevant procedures.
- ◆ Some Ukrainian refugees informed us that, after arrival, the men among them worked for 2 weeks for a local person who disappeared without paying their salaries (3 million HUF altogether).
- ◆ The HHC visited a former hotel, which functioned as an accommodation site for Ukrainian refugees, and which was in a very run-down state, offering dubious living conditions. The manager of the site was overtly hostile to the HHC monitors, not allowing them to enter and saying that 'there is no need to worry, people accommodated here are all employed and paid well'. Due to his resistance to provide access and hostile behaviour, the HHC monitors considered that working conditions offered to persons hosted at this site may be inadequate.
- ◆ An HHC monitoring team talked to a woman with a small child, who arrived in Hungary after acquiring temporary protection in Romania. She was robbed in Romania, for which she had no identity documents. She was offered a job and accommodation by a stranger on the internet, which raised some concerns about unlawful employment and exploitation, given that she had no identity documents, nor a proof of her temporary protection status in the EU.

It is **not possible to draw any conclusion** about clear exploitative patterns or major persisting risks, based on the limited information available. Nevertheless, it is clear that **several usual risk factors for exploitation are present**, namely:

- ◆ The presence of a large, vulnerable population, most of whom do not speak Hungarian, many of whom are traumatised, and most of whom are women and children;
- ◆ The absence of easily accessible information on the availability of temporary protection at the border and at shelters due to the absence of the immigration authority usually responsible for providing such information;
- ◆ The lack of any preventive policy and concrete measures by the state (no guidelines, no targeted information leaflets, no attention to this issue in general);
- ◆ Limited attention to this issue by civil society actors, too, and a general lack of actors specialised in preventing and tackling severe human exploitation, including trafficking in human beings;
- ◆ A massive labour shortage in the host country, concerning several diverse sectors, with the number of unfulfilled jobs [hitting a record high](#) in 2022;
- ◆ Hungary has been among the [top countries of origin](#) for human trafficking in Europe in recent years.

The presence of **online recruitment agencies** targeting fresh arrivals and those without a temporary protection status is particularly concerning, as well as the recruitment of workers for **badly or unpaid seasonal, informal or other physical jobs**. The elevated risk of **onward trafficking of women and children** from Hungary to other European destinations is also of great concern.