

POLICY BRIEF

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Preventing and Reducing Modern Slavery Risks for Diverse Men in Conflict and Crisis Through Increased Financial Inclusion

Angharad Smith and Leona Vaughn

Emerging Policy Considerations:

- Understand the broader relationship between financial exclusion and modern slavery risks.
- Engage the financial sector in developing specific protection interventions for financial access/inclusion in these contexts.
- Better understand the financial needs and challenges for diverse men (men of diverse backgrounds, for example gender expression, sexual orientation, ethnicity, age and ability) at risk of modern slavery/trafficking in conflict and crisis settings.
- Deepen awareness and understanding of 'gender' in anti-slavery/trafficking policy and interventions for conflict and crisis settings, beyond biological sex to include diversity of gender identity and expression.
- Expand anti-slavery/trafficking prevention policy and programming to include diverse men while promoting gender equality and recognizing distinct risks.
- Apply an anti-trafficking/slavery lens when developing policies on financial inclusion, climate adaptation, crisis response, and refugee protection.
- Broaden protection responses to consider the wide spectrum of modern slavery definitions, including but not restricted to human trafficking.
- Improve data collection and intersectional analysis on trafficking risks for men in conflict and crisis settings to improve policy development for prevention interventions.

Introduction

Recent calls¹ to incorporate comprehensive anti-trafficking measures into humanitarian responses highlight the emerging evidence linking global conflict and crises² to modern slavery, especially for women and girls.³ Within these calls is also a growing recognition of the role the financial sector can play to identify, prevent, and reduce modern slavery risks.⁴ Recent efforts by the financial sector to increase and maintain access to financial services for people fleeing Ukraine demonstrates one way in which preventive action can be taken.⁵

1 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>.

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

3 United Nations Office on Drugs and Crime (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.

4 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).

5 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).



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Financial inclusion can mitigate the risks of modern slavery, including trafficking in persons (TIP), in conflict and crisis settings. Safe access to formal services (bank accounts) and informal services (community credit) enhances stability and reduces vulnerability. UNU-CPR's Finance Against Slavery and Trafficking (FAST) initiative and other organizations recognize this and have been actively supporting the promotion of financial inclusion for people affected by conflicts and crises around the world.⁶

It is observed, however, that there is limited information on the intersecting ways in which diverse men experience specific risks associated with modern slavery in conflict and crisis settings,⁷ and what part financial exclusion plays in heightening their vulnerability. What is known is that gender norms, identity-based discrimination,⁸ and prevailing stereotypes obscure the risks of modern slavery faced by diverse men, particularly those from marginalized communities or those who have experienced sexual violence in conflict.

Improving policy and practice knowledge in this area will help develop comprehensive and inclusive approaches to slavery/TIP prevention capable of effectively addressing these challenges and risks in conflict and crisis settings. FAST has initiated a short scoping study (forthcoming) with the All Survivors Project to explore how financial access can be strengthened in response to conflicts and crises and help protect diverse men from modern slavery risks, including sexual violence within the context of TIP.

This study aims to identify gender-responsive anti-trafficking policy instruments and actors that can effectively support the assessment of financial access needs and vulnerabilities of diverse men during humanitarian responses. Haiti, a country experiencing serious environmental, social, political, and economic crises, and Poland, a major receiving country of refugees from Ukraine, are highlighted case study examples. In both sit-

uations, increasing violence, including sexual violence, against men and LGBTQI+⁹ persons in civilian populations has been reported. In Ukraine, an increasing number of men are calling trafficking helplines,¹⁰ and in Haiti sanctions have been targeted against individual traffickers exploiting primarily young men for criminal activities (drug and gun trafficking).

Drawing on a review of relevant literature, this policy brief outlines an analysis of the current policy landscape for preventing modern slavery risks in conflict and crisis and how this addresses gender and financial inclusion.¹¹ It identifies key areas for consideration when aiming to develop inclusive, gender-responsive anti-slavery/trafficking prevention policy. It specifically highlights opportunities to integrate financial access and inclusion into humanitarian policy approaches.

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

Within humanitarian policy, the data shows that men and boys constitute 50 per cent of those affected by crises and that they are increasingly vulnerable to exploitation.¹² Furthermore, data indicates that while men and boys constitute 20 per cent of those forced into commercial sexual exploitation, men and boys have a higher vulnerability to different forms of exploitation, such as organ trafficking¹³ and forced labour.¹⁴

A survivor contributor for the 2023 *Trafficking in Persons Report* states that: "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."¹⁵

Some attribute the origins of this gendered notion of victimhood to the historical foundations of anti-trafficking legislation.^{16,17} The UN Special Rapporteur for Trafficking in Persons

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

7 United Nations Human Rights Council (OHCHR), A/HRC/53/37: *Report of the Independent Expert on Protection Against Violence and Discrimination Based on Sexual Orientation and Gender Identity on Freedom of Religion or Belief, and Freedom From Violence and Discrimination Based on Sexual Orientation and Gender Identity* (Geneva: OHCHR, 2023). Available at: <https://www.ohchr.org/en/documents/thematic-reports/ahrc5337-report-independent-expert-protection-against-violence-and>.

8 'Identity based discrimination' is used here as an inclusive term which includes all identities related to e.g age, disability, race, religion, and sexuality.

9 LGBTI+ stands for Lesbian, Gay, Bisexual, Transgender, Queer or Questioning, and Intersex. The "+" symbolizes inclusivity for other sexual orientations, gender identities, and expressions.

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>.

11 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.

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

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

14 Walk Free, *Global Slavery Index 2023*.

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

16 Anna Forringer-Beal, "Why the 'Ideal Victim' Persists: Queering Representations of Victimhood in Human Trafficking Discourse," *Anti-Trafficking Review*, 19 (2022): 87-102.

17 Laura A. Hebert, "Always Victimized, Never Victims: Engaging Men and Boys in Human Trafficking Scholarship," *Journal of Human Trafficking*, Vol. 2 Issue 4 (2016): 281-296.

has made repeated calls to recognize the limitations of this victimhood construct and to improve access to international protection for men and boys, but significant gaps persist.¹⁸

Within the anti-trafficking, 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. However, this approach misses the intersections of identities such as disabled older women and overlooks the needs and vulnerabilities of diverse men.¹⁹

Humanitarian responses to conflict and crisis often adopt a ‘category-based’ approach which involves classifying 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.²⁰ This issue has been evident in various contexts, such as the application of programmes in Jordan and Syria, where it was reported that resource allocation and materials in refugee camps are predominantly catered to the needs of women and girls and neglect men and boys’ vulnerability in the same situation.^{21,22}

Financial inclusion strategies regularly focus on women, due to gender disparities in accessing financial services and the social benefits of empowering women economically. Varying degrees of attention and limited focus are given to the specific needs and circumstances of diverse men. Existing literature on financial inclusion identifies this lack of an intersectional focus.²³

An intersectional focus demands addressing gender beyond binary notions of male and female. The 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 highlights this issue, emphasizing the need for a more inclusive and comprehensive gender perspective in conflict contexts.²⁴ Increasing policy understanding of experiences will help inform better needs-based responses.

While there is a shifting understanding of the specific vulnerabilities faced by men in conflict and crisis settings, significant gaps remain in identification and protection responses in these contexts. These gaps include the need for early warning indicators that can detect exploitation and vulnerabilities experienced by diverse men, as well as sensitizing protection teams to raise their awareness and address their own gender biases.

Gender-Responsive and Humanitarian Policy Responses to Modern Slavery Risks in Conflict and Crisis Settings

Policy relating to conflict and crisis is observed in the literature review to be exclusively focused on human trafficking rather than wider forms of modern slavery; in conflict settings specific attention is given to the international crime of trafficking for sexual slavery.²⁵

Humanitarian responses often neglect the needs of victims of human trafficking and lack effective integration of counter-trafficking measures. The anti-trafficking response to humanitarian crises is often described by the NGO sector as ‘fragmented’ due to the involvement of multiple UN agencies and non-state actors, leading to limited coordination.²⁶ The UN Special Rapporteur has highlighted 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. International NGO the Freedom Fund has ar-

18 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* (OHCHR, 2023). Available at: <https://www.ohchr.org/en/documents/thematic-reports/ahrc5328-refugee-protection-internal-displacement-and-statelessness>.

19 Anoji Ekanayake, Rajith Lakshman, Brad K. Blitz, Jiyar Aghapouri, Amna Javed, Maria Malik, and Kiran Rahim, “Gender and Forced Displacement in Humanitarian Policy Discourse,” *Journal on Migration and Human Security* (2022). Available at: <https://journals.sagepub.com/doi/full/10.1177/23315024231189487>.

20 Oliver Lough, Veronique Barbelet, and Sarah Njeri, *Inclusion and Exclusion in Humanitarian Action: Findings from a Three-Year Study* (London: ODI, 2022).

21 Jessica Hagen-Zanker, Martina Ulrichs, Rebecca Holmes, and Zina Nimch, *Cash Transfers for Refugees: The Economic and Social Effects of a Programme in Jordan* (London: ODI, 2017).

22 Lewis Turner, “Are Syrian Men Vulnerable Too? Gendering the Syria Refugee Response,” Middle East Institute, 29 November 2016, <https://www.mei.edu/publications/are-syrian-men-vulnerable-too-gendering-syria-refugee-response>.

23 Julia Arnold and Sarah Gammage, “Gender and Financial Inclusion: The Critical Role for Holistic Programming,” *Development in Practice* Vol. 29 Issue 8 (2019): 965-973.

24 “LGBTI and Gender-Diverse Persons in Forced Displacement,” OHCHR, last accessed 22 September 2023, <https://www.ohchr.org/en/special-procedures/ie-sexual-orientation-and-gender-identity/lgbti-and-gender-diverse-persons-forced-displacement>.

25 “World Day Against Trafficking in Persons Joint Statement,” OHCHR, 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>; Global Network of Women Peacebuilders (GNWP), *Seeking Accountability and Preventing Reoccurrence: Addressing Conflict-related Sexual Slavery Through the Women, Peace, and Security Agenda* (New York: GNWP, 2020). Available at: https://gnwp.org/wp-content/uploads/GNWP-Conflict-Related-Sexual-Slavery-Research_Dec-2020.pdf.

26 Anna de Courcy Wheeler, *Modern Slavery and Trafficking in Conflict: The UN’s Response* (London and New York: The Freedom Fund, 2016). Available at: <https://freedomfund.org/wp-content/uploads/UN-trafficking-in-conflict-WEB.pdf>.

gued for the need to establish TIP as an 'Area of Responsibility' to ensure clear mechanisms for incorporating anti-slavery and anti-trafficking interventions into humanitarian action in these settings.²⁷

As noted by the Special Rapporteur, currently, many Protection Clusters²⁸ lack dedicated staff or programmes specifically focused on addressing anti-trafficking issues.²⁹ Although some complementary efforts are made through the Child Protection and Gender-Based Violence Areas of Responsibility, collaboration and awareness of anti-trafficking risks within these groups are often lacking.³⁰

The Palermo Protocol and other international instruments mandate that States prioritize and implement gender-responsive approaches in their efforts to combat TIP. The Global Compact for Refugees 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.”³¹ However, the absence of clear guidelines, as highlighted by the Organization for Security and Cooperation in Europe (OSCE) and other experts, within anti-trafficking legal and policy frameworks hinders the accurate identification of potential victims, and the understanding of their vulnerabilities and needs. OSCE’s recent report exploring gender-sensitive approaches to TIP aimed to bridge this gap. However, successful operationalization of these approaches remains limited, leaving important knowledge gaps.³²

In 2020, the International Organization for Migration published *An 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?’³³ The guide is for internal displacement contexts only, but it raises central considerations on gender-sensitive and trauma-informed research approaches.

A Spotlight on Recent Literature

A recent UN Women report³⁴ highlighted that despite calls for a more comprehensive and intersectional approach to understanding gender in humanitarian settings, this perspective has not become mainstream. Gender is often treated simplistically, with men being categorized as the generic aid recipient, without consideration of their unique experiences and challenges.

After examining UN, supranational, and State documents related to forced migration spanning the past 40 years, a recent article reveals limited integration of gender perspectives within the humanitarian discourse on forced displacement.³⁵ Analysing cases in Afghanistan, Kurdistan, and Sri Lanka, the authors find minimal attention to the identities of displaced individuals – be it their gender, age, or sexuality – and their specific protection needs. Gender and displacement policies often portray the displaced as victims rather than empowered rights-holders. The authors advocate for the integration of gender-sensitive policies by the United Nations High Commissioner for Refugees (UNHCR) and its partner organizations, that recognize the influence of gendered power dynamics on protection needs in order to enhance overall safeguarding. They also advise disaggregating gender to address the diverse needs, identities, and empowerment opportunities of displaced individuals.

In crisis and conflict settings, victims/survivors face challenges due to weakened infrastructures, limited humanitarian access, and flawed legal systems. Structural inequalities tied to factors like age, sex, gender, sexuality, disability, religion, or race/ethnicity are exacerbated, hindering justice and recovery, including financial recovery. Effective responses in these situations should prioritize survivors and address discrimination and exclusion based on a range of diverse intersectional identities.³⁶

27 Ibid.

28 Protection Clusters work on a range of protection activities in humanitarian crises including armed conflict and disasters. 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 as the “Areas of Responsibility” or AoRs.

29 Siobhán Mullally, *Refugee protection, internal displacement and statelessness*.

30 Ibid.

31 United Nations, *Global Compact on Refugees* (New York: United Nations, 2018). Available at: <https://globalcompactrefugees.org/sites/default/files/2019-12/Global%20compact%20on%20refugees%20EN.pdf>.

32 Office of the Special Representative and Co-ordinator for Combatting Trafficking in Human Beings, *Applying Gender-Sensitive Approaches in Combatting Trafficking in Human Beings* (Vienna: OSCE, 2021). Available at: https://www.osce.org/files/f/documents/7/4/486700_1.pdf.

33 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>.

34 Henri Myrtilinen, *Men, Masculinities and Humanitarian Settings: A Mapping of the State of Research and Practice-Based Evidence* (New York and Geneva: UN Women, 2023).

35 Anoji Ekanayake et al., “Gender and Forced Displacement in Humanitarian Policy Discourse: The Missing Link.”

36 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.

Growing recognition of the problems of conflict related sexual violence (CRSV) and sexual gender based violence (SGBV) targeting men and boys has resulted in an increase in literature and scholarship on the subject and supporting guidance from NGOs.³⁷ However, coordinated global and national responses to this issue are still limited in respect to mainstreaming, policy, and implementation, and to the specific and interconnected vulnerabilities and needs of diverse men who are victims of CRSV, SGBV, and trafficking.^{38,39} This observation underscores the urgent need for greater awareness and recognition of the interconnectedness of these two issues.

The understanding of factors that heighten the vulnerability of women and girls to both CRSV and TIP in times of conflict and crisis has improved significantly in research and practical applications, though there is still much work to be done. The exposure of incidents of sexual abuse and exploitation of women and children in Haiti by UN and NGO personnel during the aftermath of the earthquake, triggered a heightened focus on preventing such acts during subsequent crisis responses.^{40,41} The explicit recognition of women and girls' vulnerability to trafficking became a key area of focus in the aftermath of the conflict in Ukraine.⁴² A recent report by the United Nations Office on Drugs and Crime (UNODC) links gender, climate risks, trafficking, and women's financial exclusion.⁴³ However, the report does not adequately address the specific vulnerabilities faced by diverse men, highlighting a gap in understanding and the need to address the unique challenges they may experience.⁴⁴

Trafficking, Financial Inclusion, and Crisis/ Conflict Settings: Has It Been Identified Before Now?

While evidence on financial exclusion as a risk multiplier for trafficking vulnerability increases, empirical research supporting financial inclusion's effective utility in preventing trafficking is limited, particularly before, during, and after crises.⁴⁵ 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.⁴⁶ Though financial inclusion has been identified as a priority topic in the context of refugees and forced displacement⁴⁷ - where comparatively there is a greater body of literature (though still limited)⁴⁸ - the causal link to preventing trafficking in these contexts has been, to a much greater extent, less explored.⁴⁹

Refugees, stateless persons, and forcibly displaced persons (FDPs) are particularly vulnerable to being trafficked and experiencing other serious human rights abuses. Therefore, financial inclusion programmes tailored for these groups may have an indirect impact in reducing their vulnerability to trafficking. However, substantial shortcomings persist in addressing their needs, as they are often excluded from national policies and regulations.⁵⁰ For instance, only one country - Jordan - explicitly recognizes FDPs in their national financial inclusion strategy.^{51,52}

37 All Survivors Project, *Checklist on Preventing and Addressing Conflict-Related Sexual Violence Against Men and Boys* (All Survivors Project, 2019). Available at <https://allsurvivorsproject.org/wp-content/uploads/2022/05/Checklist-English.pdf>.

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 University: Liechtenstein Institute on Self-Determination, 2022). Available at: https://oar.princeton.edu/bitstream/88435/pr10r9m39z/1/1222_CRSV.pdf.

40 Skye Wheeler, "UN Peacekeeping has a Sexual Abuse Problem, Human Rights," *The Hill*, 11 January 2020, <https://thehill.com/opinion/international/477823-un-peacekeeping-has-a-sexual-abuse-problem/?rnd=1578754838>.

41 Interuniversity Institute for Research and Development, *Republic of Haiti: Country of Origin Information Paper* (INURED, 2017).

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

43 UNODC, "Climate, Crime and Exploitation: The Gendered Links Between Climate-Related Risk, Trafficking in Persons and Smuggling of Migrants," *UNODC Policy Brief* (Vienna: UNODC, 2022). Available at https://www.unodc.org/documents/human-trafficking/GLO-ACTII/UNODC_Climate-TIP-SOM_Policy_Paper.pdf.

44 Nadine White, "Forgotten and Abandoned: The Black, International Students Caught Up in Ukraine Conflict," *Independent*, 24 February 2023, <https://www.independent.co.uk/news/world/europe/black-students-ukraine-war-forgotten-b2288128.html>.

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

46 ICAT, *A World in Crisis*.

47 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/>.

48 Dr Megan Dwyer Baumann 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).

49 Alice Eckstein and Angharad Smith, *Delta 8.7 Cash Transfer Mapping Report* (New York: United Nations University, 2022). Available at: https://collections.unu.edu/eserv/UNU:8851/UNUDelta_CashTransfers.pdf.

50 Chrissy Martin, *Roadmap to the Sustainable and Responsible Financial Inclusion of Forcibly Displaced Persons* (Eschborn: GIZ, 2019).

51 Interview 2 (CSO), 15 June 2023; Alliance for Financial Inclusion, *The Financial Inclusion of Forcibly Displaced Persons* (2022).

52 Central Bank of Jordan, *The National Financial Inclusion Strategy 2018 - 2020* (Amman: 2018). Available at: <https://www.cbj.gov.jo/EchoBusv3.0/SystemAssets/PDFs/2018/The%20National%20Financial%20Inclusion%20Strategy%20A9.pdf>.

Extending Financial Inclusion to People Displaced by Conflict in Ukraine

An extraordinary shift occurred within the European banking sector during the Ukrainian conflict, recognizing the heightened vulnerability of women and girls to trafficking due to forced displacement. EU Member States and financial entities developed comprehensive actions, including access to financial services, to enhance protection for this group. Regulatory simplification and the enactment of the EU Temporary Protection Directive (TPD) facilitated the successful implementation of these initiatives. Examples from commercial banks across Europe, documented by FAST,⁵³ demonstrate how regulatory simplification supported account opening for people vulnerable to or escaping modern slavery and/or sexual violence.⁵⁴

Early analysis attributes this unprecedented response to factors such as the implementation of the TPD and the efforts of initiatives like FAST, ICAT, and Women's World Banking, which advocated for access to banking and engaged the financial sector in identifying and addressing slavery and trafficking in crisis and conflict situations. Prior to the Ukrainian conflict, financial inclusion responses to conflict were limited to providing financial assistance to refugees and FDPs, without a specific anti-trafficking lens.

The global response to anti-trafficking in humanitarian settings has predominantly revolved around security concerns, addressing TIP from an anti-money laundering and counter-terrorism financing perspective. While guidance in these settings may mention economic empowerment policies, ensuring access to financial services as a protective mechanism is not clearly stated.⁵⁵ The two examples of UN targeted sanctions regimes which aim to disrupt trafficking do not have explicit actions to mitigate increased or sustained financial exclusion. However, the most recent humanitarian carve-out, introduced in Resolution 2664 and implemented across all UN sanctions regimes, provides 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.⁵⁶

The link to climate vulnerability and financial exclusion is gaining increased attention.^{57,58} An article by the Centre for Financial Inclusion found that over 1 billion unbanked adults, 80 per cent of the global unbanked population, live in the most climate-vulnerable economies. 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. In these settings, reliance on social networks for emergency funds is low due to simultaneous job loss/income reduction within families or communities.⁵⁹ Very recent explorations of the nexus between climate change, environmental damage, and modern slavery have also begun.⁶⁰ However, the role of financial inclusion as a preventive and supportive measure for modern slavery victims remains largely unexplored. Inclusive approaches to disaster risk management which safeguard against human trafficking in disaster aftermath and recovery will need to understand how these issues are interconnected.⁶¹

Emerging Policy Considerations:

- **Look beyond the binaries:** The literature review has highlighted the need to improve awareness and understanding of gender in anti-trafficking/anti-slavery policy and interventions in conflict and crisis. Lessons could be learned from progress addressing SGBV/CRSV to improve knowledge for effective gender-sensitive policy approaches that support those of diverse gender identity and expression.
- **Expand slavery/trafficking prevention policies and programming to include 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.
- **Consider forms of modern slavery beyond trafficking:** 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 mod-

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

54 Ibid.

55 Anna de Courcy Wheeler, *Modern Slavery and Trafficking in Conflict: The UN's Response*.

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

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

58 Evie Brown, *Social Protection, Climate Change Adaptation and Disaster Risk Reduction* (Rapid Literature Review) (Birmingham: GSDRC, University of Birmingham, 2014).

59 Centre for Financial Inclusion, "Climate Vulnerability and Financial Exclusion Go Hand in Hand."

60 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* (New York/Accra: United Nations University, 2022).

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

ern slavery is crucial for a comprehensive approach. By expanding the focus beyond trafficking, actors involved in anti-slavery efforts can better understand and respond to the risks faced by affected populations, including those internally displaced and those forcibly displaced elsewhere.

- **Promote financial inclusion to address vulnerabilities to modern slavery:** Modern slavery/trafficking prevention policy and guidance would benefit from increased understanding of the intersections between financial exclusion and modern slavery risks. 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.
- **Integrate an anti-trafficking/modern slavery lens in relevant policies:** Modern slavery/trafficking prevention policy and guidance would benefit from increased understanding of the intersections between financial exclusion and modern slavery risks and developing/emerging practice for the most effective protective interventions for financial access and inclusion more broadly. States should prioritize integrating an anti-trafficking lens into their policies surrounding financial inclusion strategies, national climate adaptation plans, crisis preparedness and response measures, and refugee protection.
- **Integrate a more focused anti-trafficking response into the Global Protection Cluster (GPC):** The GPC has the potential to play a significant role if slavery/trafficking becomes a 'Key Area of Responsibility.' Failing this, continued efforts must be taken to address these gaps and integrate a more focused anti-trafficking response into the programmatic response of the GPC. The Literature Review indicates that there could be increased synergy across policy areas and international platforms, including initiatives like the Platform for Disaster Preparedness and the United Nations' Global Compacts for Migrants and Refugees.
- **Promote collaboration and identify areas of alignment:** 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. An illustrative example in a humanitarian setting, discussed in a Delta 8.7⁶² workshop in Uganda, is the collaboration between the UNHCR's Country Office in Italy and the Italian Asylum Commission.⁶³ This partnership established procedures to identify trafficking within the asylum process, offering a promising model for replication and adaptation in other contexts.
- **Improve data collection and analysis:** Evidence-based policymaking and programmatic interventions require improved monitoring, data collection, and analysis on trafficking risks for diverse men in conflict and crisis settings and the impact and efficacy of policy interventions on these demographic groups. Initiatives like the Inclusive Data Charter and the Inter-agency and Expert Group on SDG Indicators hold promise for more integrated systems. To ensure progress, it is crucial to prioritize technical aspects, including disaggregated data collection, training, awareness raising, and capacity building involved in adopting an intersectional approach to data gathering and analysis, while safeguarding the wellbeing and safety of those involved in data collection.

⁶² Delta 8.7 was a global knowledge platform exploring what works to eradicate forced labour, modern slavery, human trafficking and child labour, an aim set out in Target 8.7 of the UN Sustainable Development Goals. Resources available at this link: <https://unu.edu/cpr/project/delta-87>.

⁶³ Alice Eckstein, *Delta 8.7 Country Policy Research Workshop on Uganda: Workshop Briefing* (New York: United Nations University, 2022). Available at: https://collections.unu.edu/eserv/UNU:8849/UNUDelta_UgandaWorkshop.pdf.

Author bios: Angharad Smith is a research consultant with UNU-CPR's FAST initiative.

Leona Vaughn is the Vulnerable Populations Lead for the FAST initiative.

About FAST: This Policy Brief is an output of Finance Against Slavery and Trafficking (FAST), a multi-stakeholder initiative based at 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.

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