PROTECTION OF UKRAINIAN CHILD REFUGEES IN PRIVATE ACCOMMODATION — THE GERMAN EXPERIENCE

ECPAT Deutschland e.V.
Arbeitsgemeinschaft zum Schutz der Kinder vor sexueller Ausbeutung

RESEARCH PAPER BY ECPAT GERMANY, FOR THE PROJECT "VORBILD UKRAINE? HILFESYSTEM DER ZUKUNFT"

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Europeans responded to the arrival of millions of Ukrainians fleeing Russian aggression with solidarity and the offer of private accommodation. A comparison of the quick, positive response to Ukrainian citizens arriving in Europe to the lack of safe and humane response facing refugees from other regions raises implications of racism. The limited protection of stateless and third-country nationals fleeing the Ukraine has been especially egregious. We remind our readers of the principle of non-discrimination in the UN Convention on the rights of the Child in the hope for an improved response to children seeking protection in Europe. New and existing networks and online platforms provided an infrastructure to connect Ukrainian refugees with potential hosts and landlords. This remains a valuable response to the acute need for accommodation and the critical state of government-run refugee accommodation. Yet, private accommodation, removed from established safeguards, carries risks to vulnerable refugees. There are two types of private accommodation for refugees: (1) accommodation in normal (un)furnished apartments, that are being rented via a rental agreement (without anyone else living there), (2) accommodation in private households, which means private persons renting out one or several rooms in their apartment or house to refugees either based on a subrental agreement or sometimes even for free (which means the person subletting the rooms lives in the same apartment/house as the refugees). In this survey we mostly focused on the risks for children and youth in the 2nd type of accommodation.

Ukrainian children in private accommodation are excluded from existing protection systems that focus on refugees, unaccompanied and separated children (UASC)[1], and children integrated into national child protection systems. Though they may seem integrated into German society, these children face the same risks and vulnerabilities as other children arriving in Germany as refugees: social isolation, conflict- and flight-related trauma, distrust and a lack of familiarity with available sources of support. For children in private accommodation, the lack of actors with a mandate or expertise to identify, monitor and react to these vulnerabilities increases their risk of trafficking and exploitation. Lack of coordination, fragmented protection mandates, unreliable registration data, and limited integration further complicate effective protection.

The discussion presented in this paper is based primarily on interviews with civil society and other actors involved in the response to arrivals from the Ukraine and their private accommodation in Germany. It addresses dilemmas and challenges raised by the legal, administrative and social circumstances of this group. The discussion is limited to children living with adults in private accommodation, excluding recognized unaccompanied and separated children and children from Ukrainian institutional care. These groups have enjoyed significant consideration in the research and policy response. As of this writing, the authors are unaware of ongoing research or policy proposals with an explicit focus on child protection in private accommodation.

The choice to focus on interviews with actors providing initial and ongoing support instead of Ukrainian children or their caregivers had multiple reasons. Attempts to gather experiences of Ukrainian child refugees in a safe and child-centred way fell outside the scope of this project's resources. Gathering information directly from adult Ukrainian refugees, e.g., in online interviews or live focus-groups proved difficult to realize. Various at-

[1] Committee on the Rights of the Child. 2005. General Comment No.6 (2005) - Treatment of Unaccompanied and Separated Children Outside their Country of Origin. United Nations. Available: https://www2.ohchr.org/english/bodies/crc/docs/gc6.pdf

tempts to contact communities directly or through support organizations were met with a lack of response. The same is true of questionnaires for anti-trafficking counselling centres or professionals providing psycho-social support. Service providers are overextended, while Ukrainian refugees' lack of response may be explained by scepticism towards NGOs without direct relationships with the community and/or "survey fatigue". Our primary sources are therefore interviews with actors providing support in the initial period of arrivals and ongoing. We thank interviewees and those who indirectly supported the research by facilitating interviews or sharing relevant publications.[2]

We hope to contribute a child- and protection-centred perspective to the ongoing discussion of private accommodation as a complement to government refugee accommodation. States' obligations to protect children and ensure their rights, regardless of nationality, origin or migration sta-

[2] Interviewee's names and affiliations are on hand with researchers but are not cited to allow more open exchange of views.

II. Background

On 24 February 2022, Russia attacked the Ukraine escalating a war that continues one and a half years later. Europe and Europeans reacted with immediate concern and support for arriving refugees.[3] The arrivals and response differed from the ongoing refugee arrivals to Europe from the rest of the world. In comparison to other refuge situations, the population of refugees from the Ukraine is more difficult to estimate. The registration varies from other refugee populations, as Ukrainian citizens are entitled to visa-free travel to and from the EU, which means they may change locations within Europe, and many are travelling to and from the Ukraine during the war. Nevertheless, it is noticeable that they were predominantly Ukrainian women and children, who could enter and move through Europe freely.[4] The EU implemented the Temporary Protection Directive,[5] allowing Member States to develop systems of protection and support for citizens from the Ukraine, supplementing regular asylum systems.[6] The Ukrainian diaspora and civil society played a larger role in initial and ongoing responses than with other refugee populations, with a significant number of arrivals bypassing national refugee reception for private accommodation. EU, national and civil society discussions immediately and consistently included an awareness of the risks of trafficking and exploitation.

[3] Hötmann, G.; Hutter, S.; Rößler-Prokhorenko, C. 2022. Solidarität und Protest in der Zeitenwende Reaktionen der Zivilgesellschaft auf den Ukraine-Krieg. Available: https://bibliothek.wzb.eu/pdf/2022/zz22-601.pdf

[4] Mediendienst Integration. 2023. Flüchtlinge aus der Ukraine. Available: https://mediendienst-integration.de/migration/flucht-asyl/ukrainische-fluechtlinge.html

[5] The Council of the European Union. 2001. COUNCIL DIRECTIVE 2001/55/EC. Official Journal of the European Communities. Available: https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32001L0055

[6] Council of the European Union. 2022. DECISIONS Council implementing Decision (EU) 2022/382. Official Journal of the European Union. Available: https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32022D0382

Known vulnerabilities inadequately addressed in practice

According to the UNHCR, 8,255,288 people have fled to Europe since the beginning of the conflict, of which 5,140,259 registered for Temporary Protection (or similar status), with **1,068,667** refugees in Germany.[7] Women with children, children arriving alone, and people with special needs (e.g. elderly, those with medical conditions, or children placed in care) formed a majority of the arrivals.[8] Of those arriving in Germany, 349,000 were children under the age of 18, with 133.000 of primary school age (6-11) and 127.000 between the ages of 12 and 17.[9]

Among respondents to a German government survey, 80% reported arriving with a child, including children from their extended family, 77% reported travelling as a single woman without another adult, and 70% re-

[7] UNHCR. 2023. Operational Data Portal - Ukraine Refugee Situation. UNHCR. Available: https://data2.unhcr.org/en/situations/ukraine

[8] Bundesamt für Migration und Flüchtlinge. 2023. Geflüchtete aus der Ukraine in Deutschland: Ergebnisse der ersten Welle der IAB-BiB/FReDA-BAMF-SOEP-Befragung. Forschungszentrum Migration, Integration und Asyl. Available: https://www.bamf.de/SharedDocs/Anlagen/DE/Forschung/Forschungsberichte/fb41-ukr-gefluechtete.pdf?__blob=publicationFile&v=11

ported staying in private accommodation upon arrival.[10]

This makeup of arrivals led to a heightened awareness of trafficking and exploitation risks. Media outlets accompanied reports of volunteers offering transport at Europe's borders with warnings and examples of suspected traffickers or victims.[11] The huge volunteer response was recognized as a risk factor, with initial statements including specific calls for vetting.

> "Vetting systems must also be strengthened to register and screen organisations, companies and individual volunteers offering support to refugees."[12]

Within three months of the outbreak of the war, a joint action of 14 EU member states, examining 125 online platforms for human trafficking of Ukrainians, discovered 9 potential traffickers and 9 potential victims.[13] The UNHCR[14] and The Council of Europe's anti-trafficking body, GRETA (Group of Experts on Action against Trafficking in Human Beings)[15], issued calls for protection of Ukrainian child refugees from exploitation.

The focus of these concerns seemed to lie in the initial transit and arrival in Europe. Ukrainian citizens, covered by the Temporary Protection Directive, enjoyed quick legalization of status outside regular asylum systems, access to the labour and housing markets, and access to regular social security programs. Formal administrative and legal access may have led to assumptions that Ukrainian child refugees receive the same support and protection as other children from common protection actors like the child and youth protection services or educators in schools. This would falsely disregard the challenges these children share with other refugee children, resulting from their experience of conflict and flight, and the practical obstacles children face in enjoying their rights. Many did not attend (local) schools, access healthcare services, or make use of social and financial services.

In an ongoing survey of 30,000+ Ukrainian refugees in the bordering countries, 77% preferred online Ukrainian school.[16] Trauma, uncertainty at the length of stay in Germany, lack of space and teachers, and criticism of the level of learning in classes attended by Ukrainian children may all be seen as demotivating factors for children's attendance of German schools. The psychological well-being of children and adolescents from Ukraine is lower compared to other peers in Germany.[17]

Accessing support for Ukrainian arrivals including children often depends on registration. In Germany, the authority for registration procedures lies with the local immigration authorities. However, refugees from Ukraine, who arrived by 30 November 2022 did not need a residence permit for the first 90 days after their first entry to Germany. If they stayed longer than 3 months though refugees are required to make an appointment with municipal authorities to register and receive a resident permit. Children are registered in a family form with their parents, and it is unclear whether children are present, or child protection considerations are included in the procedure. Although conditionality of benefits may encourage faster and more complete registration, it also presents obstacles to refugees in transit or in precarious housing without a stable address.

[9] Ibid.

[10] Ibid.

[11] Cincurova, S.; Lüdke, S.. 2022. Ukrainian Refugees Report Cases of Exploitation in Europe. Der Spiegel. Available: https://www.spiegel.de/international/europe/open-arms-the-exploitation-of-ukrainians-in-the-european-union-a-83327326-3692-4663-92f3-85a26731c0c2

[12] Triggs, Gillian. 2022. Statement on risks of trafficking and exploitation facing refugees from Ukraine. UNHCR.

[13] Europol. 2022. Human traffickers luring Ukrainian refugees on the web targeted in EU-wide hackathon. Europol. Available: https://www.europol.europa.eu/media-press/newsroom/news/human-traffickers-luring-ukrainian-refugees-web-targeted-in-eu-wide-hackathon

[14] UNHCR. 2022. Statement on risks of trafficking and exploitation facing refugees from Ukraine attributed to UNHCR's Assistant High Commissioner for Protection. UNHCR. Available: https://www.unhcr.org/news/news-releases/statement-risks-trafficking-and-exploitation-facing-refugees-ukraine-attributed

[15] Council of Europe. 2022. States must act urgently to protect refugees fleeing Ukraine from human trafficking. Council of Europe. Available: https://www.coe.int/en/web/anti-human-trafficking/-/greta-statement-states-must-urgently-protect-refugees-fleeing-ukraine

[16] UNHCR. 2023. Protection Risks and Needs of Refugees from Ukraine. UNHCR. Available: https://data2.unhcr.org/en/dataviz/293?sv=54&geo=0

[17] Eubel, C.; Pürckhauer, A. 2022. Über 200.000 ukrainische Schüler*innen aufgenommen. Mediendienst Integration. Available: https://mediendienst-integration.de/artikel/ueber-200000-ukrainische-schuelerinnen-aufgenommen.html

Private accommodation — a first for vulnerable categories of refugees arriving to Europe

According to surveys of Ukrainian refugees in Europe and Germany, a majority entered private accommodation upon arrival, bypassing official refugee housing. Many were hosted in personal networks, naming the presence of family or friends as the main reason to choose Germany as a destination country. In Germany, 74% were living in private accommodation, compared to the limited number of refugees housed in government-provided refugee accommodation (9%). A not insignificant group reported residing in hotels (17%).[18]

Accommodation has remained a primary concern of Ukrainian refugees and host communities.[19] A lack in official response, behind refugee needs and civil society action, created space for innovation and self-organization.2Ukrainian arrivals were initially focused on urban centers, with Berlin in the role of major transportation hub, both for arrivals and transit. In combination with the scarcity of available housing and urgency of their situation, many arrivals turned to formal or informal online advertisements and housing platforms. Telegram group chats and Facebook groups were named as primary sources of information, in addition to personal networks. Ukrainians in Germany provided many with housing and support, despite their own burdens of trauma and stress.

[18] Bundesamt für Migration und Flüchtlinge. 2023. Geflüchtete aus der Ukraine in Deutschland: Ergebnisse der ersten Welle der IAB-BiB/FReDA-BAMF-SOEP-Befragung. Forschungszentrum Migration, Integration und Asyl. Pages 43-44. Available: https://www.bamf.de/SharedDocs/Anlagen/DE/Forschung/Forschungsberichte/fb41-ukr-gefluechtete.pdf?__blob=publicationFile&v=11

[19] Hötmann, G.; Hutter, S.; Rößler-Prokhorenko, C. 2022. Solidarität und Protest in der Zeitenwende Reaktionen der Zivilgesellschaft auf den Ukraine-Krieg. Available: https://bibliothek.wzb.eu/pdf/2022/zz22-601.pdf

III. Legal obligations to protect children in private accommodation

States have obligations to identify and protect child refugees, supporting them in enjoyment of their rights as children. Particularly relevant to Ukrainian refugee children in private accommodation are the obligations to protection from all forms of violence and abuse[20] and to ensure an adequate standard of living.[21] These obligations are codified in international law (e.g., UN Refugee Convention,[22] UN Convention on the Rights of the Child[23]) and embedded in primary and secondary EU law. In addition to protection and care, the UN CRC requires states to provide a "standard of living adequate for their physical, mental, spiritual and moral development," with adequate space and privacy.[24] The UN Committee on the Rights has interpreted this obligation to include access to social services,[25] which was also formally adopted the EU's Council on Refugees and Exiles that specifically included the right to adequate accommodation.[26] States obligations to protect children begin with ensuring their prompt identification in border- and migration-controls and their referral to a child protection authority.[27] To this end, states should "provide guidance to all relevant authorities on the operationalization of the principle of the best interests of the child [...] and develop mechanisms aimed at monitoring its implementation in practice."[28] Recommendation of case-by-case best interest assessments extends to include children with parents.[29] The obligation to protect is interpreted as including "the protection and reduction – to the maximum extent possible – of migration-related risks faced by children". A child's right to participation requires states to provide timely information to children on their rights and available services, in their language, in a child-sensitive and age-appropriate manner.[30]

The EU Charter of Fundamental Rights incorporates these rights and obligations in its own article on the rights of the child.[31] The Charter additio-

[20] United Nations. 1989. Convention on the Rights of the Child. Articles 19, 26, 32, 34, 35, 36. General Assembly. Available: https://www.ohchr.org/sites/default/files/crc.pdf

[21] United Nations. 1989. Article 27.

[22] United Nations. 1951. Convention Relating to the Status of Refugees. General Assembly. United Nations, Available: https://www.ohchr.org/sites/default/files/refugees.pdf

[23] Ibid

[24] United Nations. 1989. Convention on the Rights of the Child. Article 27. General Assembly. Available: https://www.ohchr.org/sites/default/files/crc.pdf.

[25] Committee on the Rights of the Child. 2023. Views of the Committee adopted under the Optional Protocol to the Convention on a communications procedure, Communication No. 130/2020. para. 8.11. United Nations. Available: file:///C:/Users/Assistenz/Downloads/G2301992.pdf

[26] European Council on Refugees and Exiles. 2023. ECRE Legal Note 14: The right to accommodation under the TPD. ECRE. Available: https://ecre.org/ecre-legal-note-14-the-right-to-accommodation-under-the-tpd/.

nally defines the rights to dignity, social assistance (regarding housing), and private and family life.

The application of these obligations to child refugees has been detailed in instruments of secondary EU law. Children are classified as vulnerable persons in the Reception and Return Directives, requiring states to assess their special needs.[32] The Receptions Directive requires states to provide applicants for international protection with material reception conditions that provide an adequate standard of living, safeguarding mental and physical health, as well as taking measures to prevent violence in the accommodation.[33] The EU Anti-Trafficking Directive and Directive on combatting the sexual abuse and exploitation of children also define state protection obligations.[34]

The Temporary Protection Directive, drafted to supplement states' refugee response with minimum standards for protection in cases of mass influx of displaced people does not lift the obligations of refugee and child protection rules.[35] States are required to ensure their interpretation and implementation of the TPD complies with the EU Charter, including the rights of the child. The TPD requires Member States to provide beneficiaries with suitable accommodation or the means to enable them to obtain housing. It includes the obligation to provide "necessary assistance" with regards to social welfare.[36] Member States are also required to ensure the necessary representation of unaccompanied minors and their placement with a legal guardian. The Directive emphasizes, that the views of the child should be considered in accordance with the age and maturity of the child.[37]

Member States can rely on Operational Guidelines on the Temporary Protection Directive[38] for a more detailed interpretation of their obligations. These designate the protection of children fleeing the Ukraine as a priority, calling for protection and access to their rights (education, healthcare, psychosocial assistance), informing them and taking their views into account. Member States are called on to ensure "an integrated child protection response, with cooperation and coordination of relevant authorities." This response should include training those working with children and the involvement of child protection professionals.[39] The Guidelines outline

IV. Insights from the field

Arrival Situation

Civil society organizations, strengthened by numerous volunteers took action to support Ukrainian refugees arriving at Berlin central train and bus stations, providing information, food, and medical care. Coordination and communication were informal and dynamic. The organizations involved in the first response included the German Red Cross, the Berlin City Mission, SOS Kinderdorf, Housing Berlin, Tubman Network, and many others. After the first four to six weeks, the government response included closing the reception areas at the central bus station and redirecting refugees to the central train station. The Berlin Senate set up a "Welcome tent" under the coordination of the Berlin City Mission outside of the central train station to receive the two to three thousand daily arrivals.[42]

Transportation from Berlin to other areas of Germany was organized, and the Federal Government opened a "Ukraine Arrival Centre" along existing

[27] CMW; CRC. 2017. Joint General Comment No. 3 (2017) of the Committee. para. 31. United Nations. Available: https://documents-dds-ny.un.org/doc/UNDOC/GEN/G17/343/59/PDF/G1734359.pdf?OpenElement

[28] CMW; CRC. 2017. para. 31(h).

[29] CMW; CRC. 2017. para. 31(f).

[30] Committee on the Rights of the Child. 2009. General Comment No. 12. (2009) – The right of the child to be heard. United Nations. Available: https://www2.ohchr.org/english/bodies/crc/docs/advanceversions/crc-c-gc-12.pdf

[31] European Union. 2012. Charter of Fundamental rights of the European Union (2012/C 326/02). Article 12. Official Journal of the European Union. Available: https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:C2012/326/02.

[32] European Parliament; Council of European Union. 2008. DIRECTIVE 2008/115/EC. Article 3 (9). Official Journal of the European Union. Available: https://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2008:348:0098:0107:en:PDF

[33] European Parliament; Council of the European Union. 2013. Directive 2013/33/EU. Articles 3, 17, 18. Official Journal of the European Union. Available: https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32013L0033

[34] Committee on Civil Liberties, Justice and Home Affairs; Committee on Women's Rights and Gender Equality. 2001. REPORT on the implementation of Directive 2011/36/EU on preventing and combating trafficking in human beings and protecting its victims. European Parliament. Available: https://www.europarl.europa.eu/doceo/document/A-9-2021-0011_EN.html

[35] Council of the European Union. 2001. Temporary Protection Directive 2001/55/EC. Official Journal L 212. Available: https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX%3A32001L0055

[36] Council of the European Union. 2001. Article 13

[37] Council of the European Union. 2001. Article 16

[38] European Commission. 2022. Communication from the Commission 2022/C 126 I/01. Official Journal of the European Union. Available: https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52022XC0321(03)

[39] European Commission. 2022. Section 1.

[40] Ibid

refugee reception at the former airport, Tegel.

Ukraine arrival centre

Multiple organizations described the refugee reception centre at Tegel as a worst-case solution, at least initially. Inadequate material conditions, long lines, "getting stuck there" and difficulties leaving, and cases of sexual violence were named as reasons refugees and refugee support actors advised seeking alternatives if possible.

Those involved describe an initial response by civil society rushing to fill a gap left by delayed official response. Their collaboration is based in a shared sense of urgency and awareness of risks to children (and other vulnerable groups), informal collaboration and learning-by-doing. Specialized community-based organizations were engaged to support third country nationals and arrivals with special needs (e.g., Roma families, or those with disabilities). Arriving refugees were quickly and informally connected with volunteers offering accommodation, with limited or no vetting of the hosts, who often picked up arriving refugees directly at the transportation hubs. Interviewees described coordinating matches as costing "an insane amount of work," introducing challenges of knowledge retention in conditions of high volunteer turnover.

At the train station

One organization described working with two-person teams, a volunteer and a translator, who spoke to families with children to assess and assist with their humanitarian needs (information, medical care, food or clothing, tickets to travel on).

The second month saw the focus of arrivals at Berlin main train station, the establishment of a "Welcome tent" with a stronger presence of (official) support organizations and child protection actors. The focus shifted from immediate needs (information, food, medical care, short-term accommodation) to longer-term concerns of housing, employment, childcare and navigating the German administrative system. Interviewees described ongoing challenges facing Ukrainians and those supporting them: limited numbers of translators, difficulty navigating multiple agencies offering different types of support, and scarcity of housing in urban areas where childcare, schools and jobs are centred.

Reports of abuse

None of the interviewees were aware of identified cases of child abuse or exploitation. Police investigated a number of suspicious cases (20) in the initial phase, which did not lead to an increase in identified cases. One initiative described working with police to remove "creeps" at the station and reporting "suspicious" offers of accommodation explicitly seeking women and children. A government agency tasked with care for unaccompa-

[41] Council of Europe Portal. 2021. Conference: "Ending trafficking in Children and Young Persons: Together, towards a future without child trafficking in Europe". Council of Europe. Available: https://www.coe.int/en/web/anti-human-trafficking/-/conference-ending-trafficking-in-children-and-young-persons-together-towards-a-future-without-child-trafficking-in-europe

[42] Berliner Stadtmission. 2023. #NothilfeBerlin für die Ukraine. Berliner Stadtmission ev. Kirche. Available: https://www.berliner-stadtmission.de/spenden/nothilfeberlin

nied children similarly received requests for "only Ukrainian unaccompanied children" to foster, but also reported no signs of abuse or trafficking.
Although reporting no calls about child-specific abuse, or officially recognized cases of abuse or exploitation, actors with a stronger link to the community (e.g., Ukrainian-language helplines, community-based platforms) described frequent reports from adults of abuse and unsafe situations in private accommodation. These include invasions of privacy and sexual harassment, e.g., a host and their drunk friends entering a sleeping female refugee's room or playing pornographic videos at loud volume in the presence of the female refugee. Other complaints included landlord-imposed limitations to use of the apartment's facilities or space, sudden increases in rent, controlling behaviour and verbal abuse. One platform reported mediating in approximately 10 situations of landlord abuse, finding the refugees new accommodation.
When asked for potential causes of the difference between official and unofficial reports of abuse in private accommodation, some pointed to Ukrainian refugees' mistrust of authorities, preference for solving problems within families, and feeling forced to endure abuse because of a lack of alternative housing.

Safety measures upon arrival

Interviewees reported a heightened awareness of risks of abuse, including by volunteers and those offering housing, during the initial phases of arrivals in Berlin. Most reported taking "common sense" safety measures at their own initiative, without input of child protection experts or government coordination.
"No place for human trafficking" posters were described as a form of deterrent, letting potential perpetrators know that support volunteers were on alert. Arriving refugees (adults) were provided with various flyers including information on safety risks, precautions, and sources of assistance (e.g., telephone numbers of police, helplines). No information was provided specifically to children.
Children travelling alone were referred to the police who were present at transport hubs. Interviewees confirmed the responsiveness of child protection actors. In addition to a referral point for children and vulnerable refugees, a "kid's corner" was temporarily organized at the main train station. The idea of "child protection officers" wearing easily recognizable yellow vests was discussed, but not implemented. This was later realized in the "Welcome tent". Volunteers were provided with information on recognizing and reporting suspicions of abuse or trafficking, e.g., by the KOK or the Youth Service, although such measures were not systematic and limited to a self-selecting group.
Platforms facilitating matches between refugees and those offering housing progressively added safety measures in their processes, although none reported child-specific measures. A first step was to prevent women and children from being placed with single men offering housing. They began registering hosts' identities and telephone numbers, later confirming with ID documents. By sending a volunteer to accompany refugees to the initial meeting with a host, one initiative was able to assess the suitability of accommodation and provide a way out if the refugee did not want to stay.

Although a careful scepticism was reported regarding those volunteering to host or chauffeur refugees, no initiatives or platforms reported requiring background checks from their own volunteers. One interviewee reported that authorities in the "Welcome tent" requested a test sample of employees and volunteers with certificates of good conduct. This may be explained by existing relationships and trust built within social groups active in civil society.

Safety measures of private accommodation platforms

Many Ukrainians continued finding information on available accommodation through (informal) social media groups or friends and family, while some online platforms played a more proactive role in facilitating connections between hosts and refugees. This seems to follow a progression from informal to formal identification of hosts, and a combination of automized, digital processes with elements of personal mediation.
Creating user accounts and digital identification of hosts with ID documents allowed traceability in case of reported abuse and may have acted as a deterrent. All platforms allowed hosts and refugees to choose or reject a "match". This was achieved with online, telephone or in-person meetings, or by sharing information and photos of the available accommodation on the platform. After placement, all platforms were available to facilitate conflict resolution or find alternative accommodation. One platform described a "traffic light system" representing escalating urgency of problems, based on follow-up emails to hosts and refugees. The platforms reported insufficient capacity for pro-active monitoring so their support in cases of abuse or conflict was reactive.
The platforms' child protection measures were limited to providing information to hosts and refugees on their websites and providing more active support upon request. The websites included information on reporting abuse to police and helplines, reporting UASC to the authorities, and more general information on e.g., access to education and social welfare benefits. No measures were explicitly aimed at preventing, identifying, or reporting child abuse or exploitation. None of the platforms offered employees or volunteers specific awareness-raising, training, or guidance on reporting child protection issues. Hosts, employees and volunteers were not required to undergo background checks or provide certificates of conduct.

Child-specific concerns

Interviewees reported high awareness of the vulnerability of children travelling alone. Some describe receiving alerts on expected arrivals of unaccompanied and separated children from authorities in transit countries, allowing for their immediate interception and referral to police. No concerns were raised about referral to the appropriate government agencies tasked with guardianship and care for this group (BumF). One interviewee described such separations from parents as mostly temporary, with a parent expected to follow within a short time, or the child being reunited with family elsewhere. The group of children travelling together with adults has raised more urgent concerns. A significant group of children fled the Ukraine with adults other than their parents or caregivers. Adult

siblings, extended family, friends and neighbours agreed to take care of children in the urgent circumstances of flight from conflict. Often, agreements with parents were not formalized, or were "formalized" with handwritten or digital messages between parents and these temporary caregivers. Steps were taken by German and Ukrainian authorities (e.g., UA consulates) to offer guidance on recognizing such agreements, but support organizations continued to struggle with their interpretation and acceptance. Without systematic control of these relationships by border authorities, these children were not recognized as UASC. They remained under the radar of child protection professionals, which multiple interviewees described as disconcerting. Interviewees raised concerns of the sustainability and long-term well-being of children in the care of adults dealing with their own trauma and stress. The same applies to older children, who might not have been recognized as minors at first look.

Regardless of formal recognition of their relationship, children in the care of adults were predominantly housed in private accommodation, where they risked falling further off the radar. Children, as all Ukrainian refugees, are not required to be registered the first 3 months after arrival. They can be included on the registration application of parents, but it is not clear whether they must attend registration appointments in person, and whether the registration appointment includes an assessment of their well-being and needs as children.

Finally, those involved with longer-term support of Ukrainian refugees have reported challenges regarding social and youth services. Children and their caregivers may not be aware of the support available. They may be resistant to sharing challenges of a personal nature with "outsiders" or official agencies. When civil society provides support in the short term, questions of mandate, financing and contracting of care may present obstacles when such cases are referred to the state child welfare system for long-term support.

Expert and support actors

Within days of the Russian attack on the Ukraine, a network of civil society, companies and government agencies came together under the name "Alliance4Ukraine", coordinated by Project Together. They developed a fund and facilitated online network calls of approximately 400 civil society and government actors.[43] These network calls facilitated the identification of needs and challenges in the field, and exchange of good practices. Child protection concerns were discussed, although not as one of the main priority topics. During 2022, this developed into a smaller task force that created the concept for "Helfende Wände", described below. In July 2023, the Alliance4Ukraine transformed into the Welcome Alliance, which has shifted its focus to longer-term integration support.[44]

Initial reception at transportation hubs like the main Berlin bus and train stations was carried out by volunteers. Housing Berlin was actively involved, building on their experience of supporting Syrian refugees and the unhoused in Berlin. They pointed out the significant role of initiatives like the Tubman Network[45] in supporting third-country nationals, BIPOC, LGBT+, Roma and other special groups of arrivals.

SOS Kinderdorf also played a role in both initial reception of families with children and their ongoing support.[46] Families were provided with infor-

[43] Alliance4Ukraine. Über die Alliance4Ukraine. Alliance4Ukraine. Available: https://alliance4ukraine.org/

[44] Welcome Alliance. Gemeinsam machen wir den Unterschied. Welcome Alliance. Available: https://welcome-alliance.org/

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mation, some were placed in private accommodation, e.g., short-term stays in hotel rooms, while some particularly vulnerable families were offered longer-term accommodation by the organization. The organization arranges open houses in the form of weekend meetings for Ukrainian refugees, offering information and support.

Nummer gegen Kummer[47] added a "Ukraine Helpline"[48], providing phone consultation in German, Ukrainian and Russian languages. The helpline offers free, confidential and open-ended conversations, and information on more specialized support. Initially, callers sought help in navigating the administrative system of registration, work, housing and social benefits. Later, there were more calls seeking psychosocial support, concern for family in the Ukraine, homesickness, and cultural differences. Although most callers are adults, children also called with concerns about bullying in school and uncertainty about their futures.

Multiple research projects and surveys have been carried out by DeZIM, the German Centre for Integration and Migration Research, including on private accommodation of refugees.[49] Although their past work has not included special consideration of child protection, these issues may be included in new research of the German Youth Institute (DJI) into the living conditions of children, young people and mothers who have fled from the Ukraine.[50]

Because of the heightened awareness of risks of trafficking and exploitation, KOK - The German NGO Network against Trafficking in Human Beings, took action to provide information to arrivals and raise awareness.[51] A project aiming to inform, prevent and strengthen cooperation structures for those affected by human trafficking included a report on the experiences of Ukrainian refugees in Germany, based on input from specialized counselling centres. They developed an orientation guide for refugees in private accommodation[52] including a section on accommodation for children, the need for authorization of caregivers or the appointment of a guardian by BumF.[53]

Housing platforms

Part of the initial response at arrival hubs was the development of matching platforms. Volunteer hosts were arriving at the stations, offering accommodation directly to arriving refugees. Others made offers by text or email. Limited human and technical capacity, unpredictable and chaotic circumstances in the field, and privacy concerns limited the amount of information recorded and stored. Eventually, time, lessons-learned, and decreased numbers of arrivals led to the development of more complex, online matching platforms, while some initiatives redirected their efforts to other forms of support.

The platform Vitsche is a self-organizing, community-led initiative based in the Ukrainian diaspora in Germany. Initially offering matches between refugees and offers of accommodation, the self-described "association of young Ukrainians in Germany," redirected their efforts to organizing events, protests, and humanitarian aid. Staying with friends or family, within the diaspora, is recommended as a first station after arrival.

They offer information on arriving to Germany with children and helplines for victims of gender-based violence or violence against children.[54] They highlight the need to refer unaccompanied children to the Ukrainian embassy and the Berlin-based registration and reception centre for UASC.

[46] SOS Kinderdorf. So hilft SOS-Kinderdorf Menschen in und aus der Ukraine. SOS Kinderdorf. Available: https://www.sos-kinderdorf.de/portal/spenden/wo-wir-helfen/europa/ukraine

[47] NummergegenKummer. Helpline Ukraine. NGK. Available: https://www.nummergegenkummer.de/en/helpline-ukraine/

[48] Ibid

[49] DeZIM.insights +. 2022. New platforms for engagement – Private accommodations of forced migrants from Ukraine. DeZIM Institut. Available: https://www.dezim-institut.de/fileadmin/user_upload/Demo_FIS/publikation_pdf/FA-5396.pdf

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[54] VITSCHE. If you came with a child. VITSCHE. Available: https://vitsche.org/en/help/if-you-came-with-a-childe/

"Please take care of your own safety, inform your relatives with whom and where you spend the night, and check the documents."

#UnterkunftUkraine similarly began as an impromptu action at Berlin's Central Train Station and developed into a platform with the mission of "building a sustainable network of hosts providing shelter to people in need".[55] According to information previously available on the website, they assisted 60.000 refugees in accessing accommodation, and at one point offered 360.000 beds by 160.000 people. They referred to their process as mediation, that shared contact details of refugees with hosts, after ID verification of hosts and consultation with both parties. Hosts received a proposal of potential refugee guests, which they could either accept or reject. The platform emphasized the importance of human support for the matching process, in addition to digital verification. They called for local partners to employ a de-centralized approach, combining semi-automated access to their central database of potential hosts with in-person, local support for meetings between hosts and refugees in safe ways. Hosts were informed they were not allowed to privately accommodate minors without parents, the obligation to inform the police or youth office, and links to the Berlin Senate's page on UASC. In case that they felt uncomfortable, refugees were instructed to contact the platform to request new accommodation, but were not provided with links or contact information of any support organizations besides the general emergency number of the police.

Currently, the platform's website is limited to a single page summarizing their action and accepting offers of accommodation. The platform was unavailable for an interview, and it is unclear whether they are still actively mediating between refugees and hosts.

Wunderflats is a German platform connecting landlords and those seeking mid-term, furnished accommodation, since 2015.[56] They referred to an early presence at Berlin arrival hubs, and an early identification of the need for streamlined, standardized, technical solutions for vetting and matching. In March of 2022, they began offering their existing services to Ukrainian refugees. Their website offered legal information for hosts, refugees, and an overview of German support resources (e.g., the Krisenchat helpline for children, youth welfare offices and child protection emergency services). They advise the use of a rental agreement and provide multilingual templates, offer guidance on size and types of suitable accommodation, and explain various rights and risks regarding financial aspects of hosting. Landlords are informed of the requirement to refer unaccompanied children to the authorities.

In July 2023, Wunderflats, together with the non-profit organization Project Together and the German Federal Ministry of the Interior (BMI), launched a new platform "Helfende Wände".[57] According to the BMI, the purpose of the initiative is to engage the ongoing solidarity of German civil society through private accommodation of refugees from the Ukraine, relieving the state system of refugee accommodation while reducing pressure on a tight housing market.[58] "For the security of all parties involved, all persons are registered and verified on the free platform."[59]

Helfende Wände ("Helping walls") offers basic information and guidance to potential hosts and refugees and utilizes Wunderflats' technical solutions for the matching platform. Hosts and refugees are required to register,

[55] Unterkunft.org. Available: https://www.unterkunft.org

[56] Wunderflats. Housing support for Ukrainians. Wunderflats. Available: https://wunderflats.com/en/help/subcategory/75000013783

[57] Helfende Wände. 2023. Major nationwide campaign will simplify and speed up the provision of accommodation to refugees from Ukraine in Germany. Wunderflats, https://hub.wunderflats.com/news/helfende-waende-refugees-ukraine/

[58] Helfende Wände. Helping Refugees from Ukraine find Homes. Helfende Wände. Available: https://www.helfendewaende.de/en

[59] Ibid

their identities are verified by AI comparison of a selfie with their ID document[60], and they are required to register the address and upload photos of their accommodation.

The platform's online Help centre points hosts to resources on trauma-sensitive support of Ukrainian refugees, psychosocial support for hosts and refugees, a government overview of relevant helplines (including two for children — Nummer gegen Kummer and Krisenchat), and BAMF's search website for organizations offering migration support services.[61] It raises the issue of children in private accommodation, differentiating between allowed hosting of children with parents or guardians, and disallowed accommodation of UASC.

[60] Veriff. Stop fraud. Build trust. Identity verficiation made simple. Veriff. Available: https://www.veriff.com/

[61] Helfende Wände. Help Center. Helfende Wände. Available: https://www.helfendewaende.de/en/help-center

V. Conclusion

The rights of Ukrainian child refugees in Germany are not limited by their circumstances or the applicable legal framework. The obligation to protect, support, inform and listen to child refugees is embedded in international and European instruments, including the EU asylum policy and Temporary Protection Directive. These children face the same challenges and vulnerabilities as other child refugees. Grass-roots solidarity initiatives and civil society response, although crucial, cannot replace state measures according to their obligations to protect and care for child refugees. The delay in coordinated response and lack of child-specific protection measures put and kept children in precarious circumstances, exposing them to increased risks of violence, trafficking and all forms of exploitation.

The initial response addressed the humanitarian crisis. Without official coordination, it focused on Berlin transportation hubs. Civil society built on the previous experience of supporting Syrian and other refugee arrivals and the unhoused. Common-sense good practices were based on high awareness of abuse and trafficking risks, rooted in the number of vulnerable single women and children arriving. The large number of arrivals placed in private accommodation, without adequately established safeguards or the involvement of child protection actors increased risks to children.

The reception infrastructure improved within the next few months, although civil society, the Ukrainian diaspora, and informal initiatives continued to play a crucial role in housing and supporting Ukrainian refugees. Government coordination of civil society exchange and response contributed to improved, yet insufficient, bridging of protection gaps. A positive example is the presence of child protection authorities and a designated safe space for children in the Berlin Senate's "Welcome tent". Vetting of volunteers and hosts increased, and platforms established gender-congruent matching and accompanying refugees to their first visit.

Housing remained a pressing issue. The discrepancy in reports of unsafe situations, abuse and (sexual) harassment to support organizations compared to official agencies is concerning. The refugees' struggle with bureaucracy and precarious housing situations presented challenges to accessing available support.

An initial lack of child-specific protection measures was not resolved. None of the actors involved in housing refugees (with children) in private accommodation – whether rental or in a host family — undertook monito-

ring or follow-up. No private-accommodation platforms reported engaging child-protection specialists for guidance or training, conducting in-person follow up, training staff on recognizing and reporting abuse, or offering information to children. The responsibility to recognize risks and abuse or seek support fell to caregivers, children and hosts. Delayed registration, limited access to daycare or attendance of schools, fragmentation and unclear mandates of support organizations meant children in private accommodation risked falling under the radar of common anchors of protection.

The absence of identified cases of child exploitation cannot be considered a conclusive indicator of effective protection. A lack of expertise and explicit measures among crucial response actors regarding prevention, identification, reporting and referral of cases of child abuse or exploitation remains concerning. The safety of children in the care of adults, particularly in private accommodation, has been insufficiently monitored. Children were not provided with information or support that could empower them to recognize or seek help if subject to abuse. Discussions with civil society show an awareness of these protection gaps and consensus regarding the need to build on these experiences to develop guidance and standards for future use.

VI. Recommendations

The experience of German civil society, Ukrainian diaspora and Ukrainian refugees can inform Germany's use of private accommodation as part of their refugee response in the future. Private accommodation can supplement official refugee reception, offering refugees increased levels of autonomy and integration in communities. It cannot replace refugee reception or absolve the government of its obligations to child refugees, regardless of their legal status, country of origin, or form of accommodation. The government should ensure that even children in private accommodation enjoy the same prompt identification, needs assessment and referral to support as other child refugees, unaccompanied or within families.

By developing minimum standards for child protection in private accommodation, the government can fulfil its duty of care to this specific group of children.

Minimum standards for child protection in private accommodation of refugees

The minimum standards, to be developed with child protection experts and civil society, should provide guidance to volunteer initiatives, platforms, hosts and landlords. They should incorporate safeguards established in minimum standards for foster care and refugee reception. Minimum standards should cover practical issues of vetting, privacy, hygiene, space requirements, as well as the identification and reporting of child abuse or exploitation. Specific measures should be developed for implementation by online platforms: host vetting with ID and certificate of conduct, training staff to recognize and react to child protection issues, offering a complaint mechanism or ombudsperson to respond to issues, and designate a staff member as responsible for child protection. The government

should establish, assist and monitor the implementation of these standards by platforms, e.g., offering some kind of certification.

The minimum standards should be translated into broadly applicable guidance for informal “matching” initiatives (e.g., Facebook groups). Information on child protection should be standardized and developed with hosts, caregivers and children in mind. More resources are needed that empower children with information in their languages and at age-appropriate levels. The mandate and scope of monitoring the situation of these children should be clearly defined.

Child protection should be embedded in humanitarian response systems particular to migration, as formalized elements of mandates and processes. The German government should use this time, after mass arrivals have decreased, to learn and prepare, identifying needs and good practices. By developing minimum standards and guidance now, the government can promote child promote measures that are not fear motivated, but clear-headed implementation of what is known to be effective.

Glossary

AI	Artificial Intelligence
BAMF	Federal Office for Migration and Refugees (Bundesamt für Migration und Flucht)
BMI	German Federal Ministry of the Interior (Bundesministerium des Innern und der Heimat)
BumF	Association for Unaccompanied Refugee Minors (Bundesfachverband unbegleitete minderjährige Flüchtlinge)
CRC	Convention on the Rights of the Child
DeZIM	German Centre for Integration and Migration Research (Deutsches Zentrum für Integrations- und Migrationsforschung)
DJI	German Youth Institute (Deutsches Jugendinstitut)
ECPAT	Organization for the protection of children from sexual exploitation, violence and human trafficking
EU	European Union
GRETA	Council of Europe's Group of Experts on Action against Trafficking in Human Beings
KOK	German NGO Network against Trafficking in Human Beings (Koordinierungskreis gegen Menschenhandel)
TPD	Temporary Protection Directive
UASC	Unaccompanied and separated Children
UN	United Nations
UNHCR	United Nations High Commissioner for Refugees

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