

Responses to Trafficking to Scam Centres:

Digital Accountability, Women's Human Rights and the Role of the Private Sector

*GAATW Report from the 8th United Nations
Responsible Business and Human Rights Forum*



Global Alliance Against Traffic in Women

Background and purpose

On 16 September 2026, GAATW hosted the session “Responses to Trafficking to Scam Centres: Digital Accountability, Women’s Human Rights and the Role of the Private Sector” at the United Nations Responsible Business and Human Rights Forum in Bangkok. The session responded to growing regional concern regarding trafficking to scam centres across the ASEAN region and the increasingly central role of digital technologies and online platforms in facilitating recruitment, deception and exploitation, with particular attention to the experiences of women. The session aimed to explore how trafficking to scam centres can be prevented and addressed, with a focus on digital accountability, survivor protection, women’s human rights and the responsibilities of governments and the private sector. It also provided an opportunity to strengthen collaboration between feminist and human rights organisations, impacted communities and technology and private sector actors.

Around 50 participants from civil society, government, and the private sector took part in a 90-minute, three-part, scenario-based case study exercise following the trajectory of a woman from a rural community in ASEAN who responds to an online advertisement for employment as a restaurant manager in a larger regional city. The case study was based on the real life experiences of women featured in GAATW's research.

The overall theme of the interactive session was how digital technologies, gender inequality, labour opportunities, financial systems and criminal legal responses intersect in shaping women’s experiences of trafficking, highlighting that the consequences of trafficking to scam centres can continue long after a person has been able to leave. Four main thematic areas emerged from the discussion groups

- digital recruitment: from individual awareness to shared responsibility,
- beyond rescue: gender, lived experience, and the continuing consequences of trafficking,
- from victim identification to protection and justice,
- prevention requires structural change and meaningful collaboration

The four thematic areas will be discussed in further detail below.

Key themes emerging from the session

Digital Recruitment: from individual awareness to shared responsibility

Through panelist and audience participation, it became clear that the increasingly sophisticated nature of fraudulent digital employment recruitment, advertisements circulated through social media, messaging applications and online recruitment platforms can closely resemble legitimate employment opportunities. Participants also discussed the way these technologies are used to deceive people, including AI-enabled communications and manipulated images. Strengthening digital literacy and online safety is therefore an important part of prevention. However, the discussion also **highlighted the limitations of placing responsibility on individuals to identify fraudulent opportunities**. Trafficking to scam centres is not limited to people with low levels of education or digital literacy.

This suggests that digital literacy, while important, cannot be the sole response to increasingly sophisticated recruitment practices. Technology platforms also have a role to play in identifying fraudulent recruitment practices. Technology platforms also have a role to play in identifying fraudulent

recruitment advertisements and suspicious patterns before they can cause harm. Participants discussed the need for stronger accountability and more stringent rules for platforms, as well as opportunities to develop technology that can assist people who are unsure whether an advertisement is fraudulent.

There are already examples of technology companies with social interest developing tools that may support workers and organisations. Inno Community, for example, who were in the discussion, have created an AI bot to assist workers with grievances, while Pingtar, also in the discussion, have worked on the use of WhatsApp bots for interactions, socialisation and education. These examples point to the potential for technology not only to facilitate harm, but also to support prevention, access to information and worker protection.

The challenge is therefore to consider how responsibility for digital safety can be shared between individuals, technology platforms, governments and other relevant actors, rather than relying primarily on individuals to identify increasingly sophisticated forms of deception.

Beyond rescue: gender, lived experience, and the continuing consequences of trafficking

The expertise of people with lived experience of trafficking to the scam centres shared during the session demonstrated the importance of understanding trafficking not only through the moment of recruitment or rescue, but through the full experience of exploitation and the harm that can continue once someone has left the scam centres.

The lived experience expert on the panel shared how she had responded to a false job offer she saw online and was subsequently trafficked to another country in the ASEAN region, where she was held at knifepoint and lived in extreme fear in a scam centre. Her contribution provided the most important perspective on what exploitation in a scam centre can look like and on the continuing consequences after leaving. She was able to share with participants that although she was able to escape the scam centre she still lives every day with the harm her trafficking caused. Her bank accounts have been frozen and, despite initially being recognised as a victim of trafficking, she is now facing criminal charges. **This was likely the most important learning from the session.** Session participants discussed that responses to trafficking need to consider what happens after a person escapes, is rescued or is released. Survivors may require ongoing legal and social support, including access to NGOs, social support groups and pathways to return to their original situations while continuing to receive support.

The discussion also highlighted the gendered dimensions of exploitation. For instance, participants highlighted how women trafficked to scam centres may experience additional forms of exploitation, including sexual assault and other forms of violence. A gender-responsive response therefore needs to consider not only how women are recruited and exploited, but also how their experiences are understood and addressed after they leave situations of trafficking.

The participation of the lived experience expert also reinforced the importance of including survivors in discussions about prevention, protection and responses to trafficking. Her presence helped guide the discussion and ensured that policy and institutional perspectives remained connected to the realities experienced by people who have been trafficked.

From victim identification to protection and justice

The non-punishment principle was discussed by both panelists and session participants. Despite international, regional and national laws and policies on non-punishment, **women showing clear indicators of trafficking for forced criminality continue to be arrested, detained, prosecuted and subjected to immigration sanctions and prolonged harm rather than identified and protected.**

The experiences discussed during the session illustrated this gap between victim identification and actual protection. A person may initially be recognised as a victim of trafficking while continuing to face criminal charges for activities they were forced to undertake. The non-punishment principle may also be applied by one officer or institution and not by another, as was told to the session by our lived experience expert.

This gap cannot be understood simply as a failure to apply the law. GAATW's research demonstrates that who is recognised as a victim, and who is treated as an offender, is also shaped by gender, migration status, ethnicity, poverty and other structural inequalities. Women trafficked for forced criminality may be assessed through narrow expectations of the “ideal victim”. In cases where women do not conform to these expectations, they may instead be treated as responsible for the criminal acts they were compelled to commit.

A feminist lens therefore adds more than a gender perspective to the question of applying the non-punishment principle. It examines why the principle is not applied in practice, **whose experiences are recognised as trafficking, and whose rights are deprioritised when criminalisation takes precedence over protection.**

A key theme in the session from participants was that addressing these gaps requires stronger implementation of the non-punishment principle and greater coordination across the systems that encounter people who have been trafficked, including law enforcement, immigration and judicial systems, as well as organisations providing protection and support.

Prevention requires structural change and meaningful collaboration

This session discussion reinforced that **prevention cannot focus only on identifying fraudulent advertisements. It also needs to address the conditions that make fraudulent employment opportunities attractive in the first place. Decent work, living wages, transparency and access to legitimate recruitment services are important parts of prevention.**

This requires consideration of the structural causes of why women and others are targeted by fraudulent employment opportunities, as well as the economic and social conditions that shape people's employment choices. Providing information about fraudulent recruitment is important, but it cannot replace access to legitimate and decent employment opportunities.

The different actors and potential collaboration was discussed at the session. For example, civil society and impacted communities can contribute knowledge of trafficking, exploitation and survivor support, governments have responsibilities relating to prevention, protection, justice and the implementation of the non-punishment principle and technology companies have access to systems and information that

may assist in identifying fraudulent recruitment and suspicious patterns. **Financial institutions were identified as key actors, as they can contribute to identifying relevant patterns of banking and other financial activities while ensuring that people who have been trafficked are not subjected to further discrimination or harm.**

Areas for further collaboration and consideration

The session identified a number of areas for future action, research, and relationship-building for GAATW:

- The session reinforced the importance of including survivors and impacted communities from the beginning. Their experiences are essential to understanding how recruitment and exploitation operate, the barriers faced after leaving situations of trafficking, and whether responses are addressing the harms experienced in practice.
- Prevention should include strengthening digital literacy and online safety, providing information about legitimate recruitment services and addressing the structural drivers that make people vulnerable to fraudulent job advertisements.
- There is a need to further explore how technology companies can detect fraudulent recruitment advertisements and suspicious recruitment patterns, and how digital infrastructures can be designed to prioritise safety, dignity and equality. This should include consideration of how technology can support women who have been trafficked, as well as how platforms can prevent their systems from being used to facilitate trafficking.
- Stronger cooperation is needed between governments, technology platforms, civil society, and financial institutions. Consideration should be given to the role of the private sector and how technology and financial companies can be held accountable for their role in trafficking to the scam centres. For example, is there scope for financial institutions to create clear protocols where a person's account has been used in the course of their trafficking for forced criminality.
- There is a need to strengthen implementation of the non-punishment principle and address the gap between the identification of victims of trafficking and their treatment within judicial and national systems. This includes considering how gender, migration status, ethnicity, poverty and other structural inequalities influence who is recognised as a victim and who is treated as an offender.

The session demonstrated that more knowledge and literacy on technology is important to understanding and preventing trafficking to scam centres, but technology alone cannot provide the solution. Responses must also be informed by the lived experience of people who have experienced trafficking and exploitation and must address the wider systems through which recruitment, exploitation, criminalisation and recovery take place.

GAATW will continue to build on the discussions from the session through further analysis and by identifying areas for future action, research and collaboration.