"A WICKED PROBLEM"

Seeking Human Rights-Based Solutions to Trafficking into Cyber Scam Operations in South-East Asia



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Introduction



Photo credit: AFP



In May 2025, United Nations (UN) Special Procedures mandate holders expressed their alarm over large-scale human trafficking into compounds in South-East Asia highlighting that "[t]he situation has reached the level of a humanitarian and human rights crisis"[1]. The alert had first been issued by civil society, media and UN entities including UN Human Rights some years previously of an emerging concern in the region linked to trafficking in persons, slavery and other serious human rights abuses and violations in the context of criminal ventures to perpetrate cyber-enabled fraud (scam operations). Yet, despite growing attention from Governments in the region and the international community as well as some high-profile enforcement operations, these operations are still in place and, according to most reports, increasingly entrenched and intertwined within the political economies of the region and even beyond.[2]

In the present report, issued some two years after the publication of its briefing paper entitled *Online scam operations and trafficking into forced criminality in South-East Asia: recommendations for a human rights response*[3], UN Human Rights seeks to emphasize the continuing and critical need for a human rights solution to this complex crisis. Such a response should be centred in the increased and improved human rights protection of survivors and include a robust focus on prevention.

This report updates and further contextualizes the information earlier presented by UN Human Rights. Through human rights monitoring and documentation, the report centres the lived experience of individuals who have suffered serious harms in the context of the scam operations in South-East Asia and proposes practical human rights-based responses. It also focuses on one central prevention aspect, which is the recruitment pathway that leads victims into scam compounds, examining through a behavioural science lens the barriers and enablers that render people vulnerable to fraudulent recruitment in this context.

Methodology



Photo credit : Yasuyoshi Chiba/ AFP



The information contained in this report was gathered primarily from trauma-informed monitoring conducted remotely with 19 victims (12 men, four women and three LGBTIQ+ individuals) between July and September 2025. Victims originated from Bangladesh, China, India, Myanmar, Sri Lanka, South Africa, Syria, Thailand, Viet Nam and Zimbabwe. They had been trafficked into scam operations in Cambodia, Lao People's Democratic Republic (Lao PDR), Myanmar, the Philippines and the United Arab Emirates (UAE) between 2021 and 2025, with the majority – 17 of the 19 survivors – entering the centres from 2023 onward. Some have been trafficked into more than one country. Some of the 19 victims also provided UN Human Rights with detailed information on the plight of their friends and relatives who had escaped from or were still in a scam centre in the region at the time of interview.

Further, information confidentially received from additional survivors was reviewed for the report including written statements directly received from three survivors and additional 12 individual survivor statements documented by a credible partner civil society organization (CSO). Through in-depth review of UN publications and independent CSO sources as well as credible media reports, information drawn from the individual testimonies of 30 additional survivors is also reflected here.

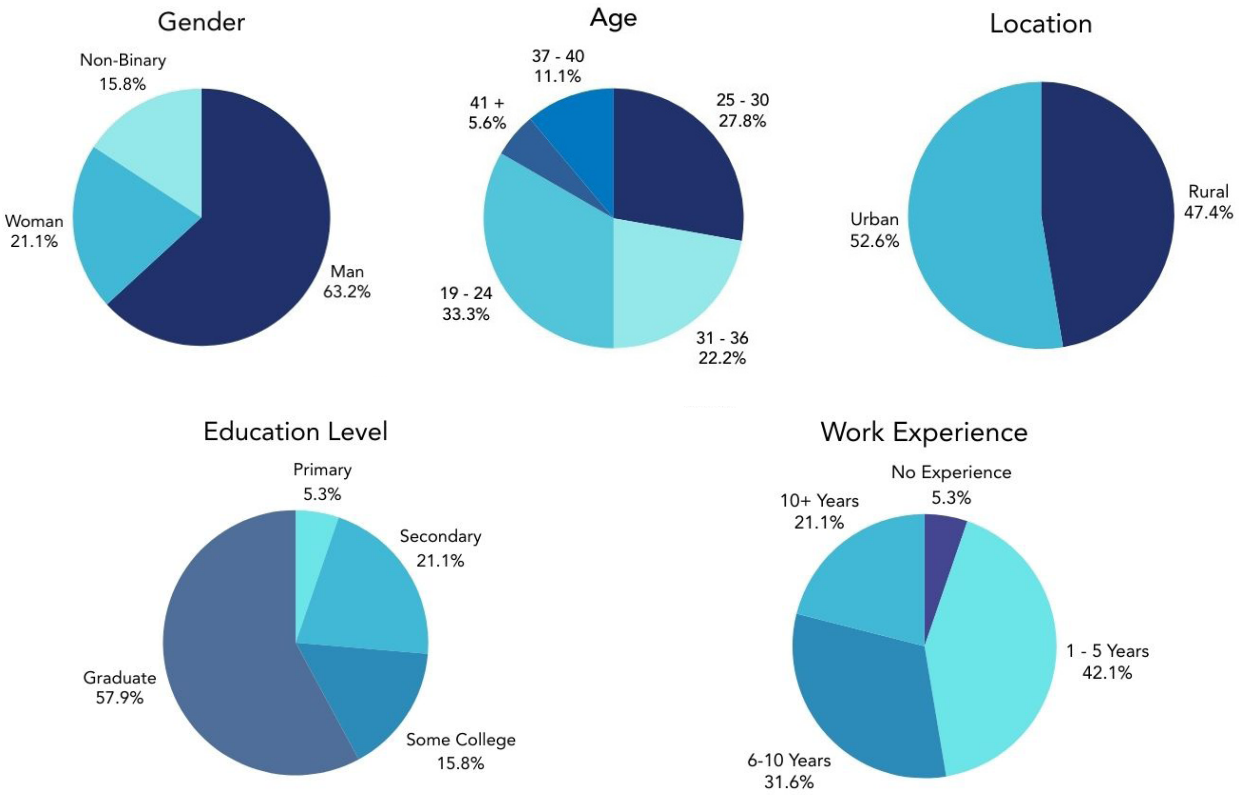
Additionally, 14 key informant interviews (KIIs) were conducted with police and border governance authorities, UN entities, academics, CSOs (including those directly involved in rescues) and other relevant interlocutors. The report also draws on contextual information through systematic monitoring from January 2024 to November 2025 of 111 media reports as well as 26 reports issued by intergovernmental organizations and CSOs and official data where available. Reflections from an expert consultation held on 22 April 2025 with the participation of the Special Rapporteur on trafficking in persons, CSOs, and UN entities are included in pertinent sections. UN Human Rights has also engaged regularly on the protection of victims of trafficking with national and regional authorities, including the ASEAN Intergovernmental Commission on Human Rights (AICHR) and the ASEAN Senior Officials Meeting on Transnational Crime (SOMTC).The report was transmitted to relevant States for factual comments prior to publication, and submissions received have been made available online as relevant.

UN Human Rights embeds the "do no harm" principle into its research, prioritizing a human rights-based and trauma-informed methodology throughout. In the report, the identity of victims has been anonymized to protect individuals and their families. Recognizing the importance of empowerment and agency and in the context of centering lived experience, the report will refer both to "victims" as well as "survivors", preferring the use of the former in contexts relevant to legal protections for victims of trafficking.[4]

Through partnership with BehaviourWorks Australia at Monash University, UN Human Rights has sought to bring a behavioural science lens to this inquiry. Conducted in parallel with trauma-informed qualitative interviews, a quantitative survey with a focus on behavioural elements within the recruitment and post-release experience of 19 survivors was carried out to generate the findings and behavioural insights presented in this report.

An accessible *StoryMap* - providing a summary of quantitative and qualitative research findings with additional survivor testimony and a Systems Map - accompanies this report.

Figure 1: UN Human Rights monitoring victim profiles



PART ONE



Protesters ask for the release of loved ones from scam compounds. The sign translates to "Rescue the Indonesian nationals who become the victims of human trafficking who are currently in Myanmar." Photo Credit : SBMI

Background

The human rights situation of significant numbers of people forced to work in scam operations across South-East Asia continues to be a matter of serious – and indeed increasing - concern. UN Special Procedures have highlighted that the cybercrime operations in South-East Asia "have taken on industrial proportions"[5]. Recent credible estimates of the scam workforce point to the involvement of at least 300,000 people originating from 66 countries.[6] Attesting to the scale of the operations, individual testimony, including as related directly by victims to UN Human Rights, reveals that single compounds could contain many thousands - and up to tens of thousands - of workers. Further, documented rescues and repatriations have involved significant numbers of people at one time, such as the release in just over two weeks of some 7,000 victims from scam operations along the Thailand-Myanmar border in February 2025.[7] Acquiring detailed data on the scamming workforce continues to remain a challenge, not least because of enduring gaps in the screening of released individuals.[8]

Reports indicate that the workforce in the compounds ranges from adolescents to people in their 60s, however the majority are young adults – predominantly men but also including women and LGBTIQ+ individuals – in their 20s and 30s. While scam compounds typically also contain operations managers and other "personnel" drawn from transnational criminal networks, the majority of the workforce in these centres will have been deceived about the nature of the work and/or the conditions in which they would be forced to live and work.[9] Experts have observed that "[c]yber scam operations exemplify a convergence of various forms of transnational organized crime on a large scale."[10]

Scam operations originated in the Mekong region and this sub-region continues to be the epicenter, with satellite imagery and on ground reports showing that 74% of all scam compounds are still present there.[11] In the Asia Pacific region, scam operations have spread to some Pacific Island Countries[12] and South Asia[13]. Outside the region, reports indicate the presence of scam centres in *inter alia* the Gulf States, West Africa and the Americas.[14]

The scam operations in South-East Asia are entrenched and well resourced, being present in remote border regions and Special Economic Zones (SEZs) as well as in cities and urban areas. In many cases, victims have described to UN Human Rights "immense" compounds (some over 500 acres in size) that are essentially self-contained towns including heavily fortified multi-story buildings within barbed wire-topped high walls guarded by uniformed and armed security personnel.[15] The compounds typically contain supermarkets, salons and restaurants as well as brothels, nightclubs, and casinos. While some compounds have been established in re-purposed locations (such as in or next to licensed casinos), victims also reported that buildings in which they were detained appeared to be newly built.[16] More agile operations have been reported in other locations, with experts noting that the scam operations are fluid and exist in different shapes – single apartments, gated houses and hotels for example - depending on the space and opportunity available.[17]

Victims are coerced into perpetrating online fraud using a range of platforms including fake gambling websites and cryptocurrency investment platforms, impersonation scams, online extortion, financial fraud as well as romantic and financial scams. Victims describe the scam operations as sophisticated, with a range of work units operating to defraud victims around the world.[18] While accurately estimating the size of the industry is complicated, some sources claim it results in annual global profits of some US$64 billion, fueled in large part by the rapid expansion of digital and crypto-based finance.[19] Typically, profits are passed through mule bank accounts, exchanged to virtual currency and moved through crypto wallets, laundered by over-the-counter brokers, and then reintroduced into formal banking channels.[20] One authoritative estimate suggests that the scam industry in the Mekong region alone is worth over $43.8 billion a year.[21]

Enforcement efforts

Within the last two years, States have undertaken a range of interventions, primarily through a law enforcement lens, to try to curb the growth of cyber scam operations in the region. The next section introduces in brief some of the law enforcement actions and other interventions that have taken place since 2023. In addition to those detailed below, other affected countries have sought to address the issue through raids and crackdowns, such as an intervention carried out in February 2025 in Pasay City in the Philippines which led to the release of over 400 people.[22] In February 2025, the Prime Minister of Cambodia established a high-level multi-agency Ad Hoc Commission to Combat Online Scams. Authorities in Thailand have sought to intensify law-enforcement actions since early 2025, including making arrests of perpetrators and disrupting electricity, internet access and fuel supplies to border compounds.[23] China, Thailand and Myanmar have set up a ministerial-level mechanism on telecommunications and cyberspace fraud which coordinates law enforcement operations in Myawaddy and other regions.[24]

While enforcement efforts have resulted in the rescue and release of many individuals, observers have decried the ad hoc and sometimes "performative" nature of law enforcement operations, whereby the scam centres promptly resume or relocate operations following raids rather than cease them completely, with the released workforce quickly replaced by new recruits.[25] Concerns

also continue to be raised in regard to the lack of sufficient and adequate prosecutions of perpetrators of trafficking and other human rights abuses in line with international law and standards.[26] In one noteworthy recent development, the Wenzhou intermediate people's court in China sentenced 28 individuals in September 2025 for their role in scam operations in Kokang, Myanmar.[27]

Regional interventions

Over the past two years, ASEAN member states have actively engaged in regional dialogue on transnational organized crime and adopted key declarations to enhance collective regional action.

- During the 17th ASEAN Ministerial Meeting on Transnational Crime in August 2023, ASEAN Member States reaffirmed their commitment to strengthen collaboration with ASEAN Dialogue Partners and other relevant external parties to address transnational crime and welcomed the adoption of six Work Plans of the ASEAN SOMTC on Cooperation to Combat Transnational Crime.[28] At the same meeting, ASEAN ministers adopted the ASEAN Multi-Sectoral Work Plan Against TIP (2023-2028) and the Labuan Bajo Declaration on Advancing Law Enforcement Cooperation in Combating Transnational Crime.
- In February 2024, the ASEAN Working Group on Anti-Online Scam was established as a platform for ASEAN Member States to cooperate and collaborate on capacity building, training and sharing of information related to combating online scams, and scams across digital and telecommunication channels.[29] The Working Group has issued a Report of the Online Scams Activities in ASEAN as well as ASEAN Recommendations on Anti-Online Scams.[30]
- At the 18th ASEAN Ministerial Meeting on Transnational Crime in August 2024, ASEAN ministers adopted the Vientiane Declaration on Enhancing Law Enforcement Cooperation Against Online Job Scams and reaffirmed their shared commitment to tackle online job scams and associated crimes.[31]
- At the 5th ASEAN Digital Ministers Meeting (ADGMIN) in January 2025, ASEAN ministers endorsed the Bangkok Digital Declaration to strengthen collaboration among Member States and ASEAN Dialogue Partners.
- At the 19th ASEAN Ministerial Meeting on Transnational Crime in September 2025 ministers adopted the ASEAN Declaration on Combatting Cybercrime and Online Scams to enhance joint actions to combat the rapidly growing threats of cybercrime and online scams in the ASEAN region.[32]
- The AICHR issued a statement in September 2025 on the telecommunication network fraud and online scamming, expressing its particular concern that these crimes have resulted in human rights violations across the region.[33]

Global interventions

Global attention has increasingly focused on the scamming industry and cybercrime in the region. In 2023, INTERPOL began to issue a series of warnings on the matter; in 2024 it coordinated a global enforcement operation and in June 2025 called attention to the expanded global footprint of human trafficking-fueled scam centres while noting that South-East Asia remained a hub of such operations.[34] Additionally, an increasing series of targeted sanctions have been imposed over the past two years against entities and individuals involved in scam operations including:

- In December 2023, the United States (US), United Kingdom (UK), and Canada imposed coordinated sanctions on nine individuals and five entities linked to the online scamming industry, including leaders of the Karen Border Guard Force (BGF) as well as individuals linked to activities in the Golden Triangle SEZ in Lao PDR.[35]
- In September 2024, the US sanctioned Cambodian businessman Ly Yong Phat and multiple entities over the scam compounds.[36]
- In October 2024, the European Union sanctioned three individuals and one entity associated with the BGF.[37]
- In May 2025, the US sanctioned the Karen National Army (KNA) as a transnational criminal organization along with the group's leader Saw Chit Thu.[38]
- In September 2025, the US imposed sanctions on nine individuals operating in Shwe Kokko, Myanmar under the protection of the already sanctioned KNA as well as four individuals and six entities in Cambodia.[39]
- In October 2025, the US in coordination with the UK sanctioned 146 individuals linked to the Prince Holding Group in Cambodia, including an indictment and forfeiture action against businessman Chen Zhi and the seizure of 127,000 bitcoins worth $14 billion, in addition to issuing further sanctions on the financial services conglomerate Huione Group.[40] Cambodian authorities subsequently launched legal action against the Prince Holding Group and Chen Zhi, resulting in the latter's arrest and deportation and the revocation of the Huione Group operating license.[41]
- In November 2025, the Republic of Korea issued the largest single sanction measure in its history, targeting 15 people and 132 entities linked to transnational scam operations.
- Thailand hosted the International Conference on Global Partnership Against Online Scams on 17-18 December 2025.

Legal framework

There is a well-established body of international law and standards which confirm that trafficking in persons and slavery are serious human rights violations. The prohibition of slavery is a jus cogens norm and international law obligations on the prohibition of slavery and trafficking in persons require States to put in place effective measures to protect victims.[42] UN Human Rights regards individuals who have been deceived, coerced, or threatened into forced criminality in the scam operations in the region as meeting the international legal definition of trafficked persons.[43] Under this definition, consent is legally irrelevant and the means used may include deception and abuse of power in addition to the use of force and deprivation of liberty. Conditions faced by victims in many cases also amounted to slavery or servitude, most starkly when people were bought and sold (including through marketplaces established on online platforms) between compounds or even within different operations in the same facility.[44]

Under international criminal law, States Parties are obliged to assist and protect victims of trafficking in persons, including provision of appropriate physical, psychological and social recovery as well as ensuring the principles of non-discrimination and non-refoulement.[45] International human rights law provides additional guidance in relation to upholding the right to life (inter alia Article 6, International Covenant on Civil and Political Rights (ICCPR)), protecting victims from torture and cruel, inhuman and degrading treatment (inter alia Article 2, Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment (CAT)), guaranteeing fundamental rights such as to healthcare and an adequate standard of living (inter alia Articles 11 and 21, International Covenant on Economic, Social and Cultural Rights (ICESCR)) and ensuring accountability and remedy including specific protections for women (Convention on the Elimination of All Forms of Discrimination against Women (CEDAW)) and children (Convention on the Rights of the Child (CRC)).

The International Labour Organization (ILO) Forced Labour Convention prohibits all work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily. Also relevant is ILO Convention 181 which regulates the conduct of private employment agencies and guides on the protection of workers using their services.[46]

Affected countries including Cambodia, Lao PDR, Myanmar, the Philippines and Thailand have ratified the ICCPR and ICESCR in addition to other core international human rights treaties. All ASEAN States are party to the Palermo Protocol and to the ASEAN Convention Against Trafficking in Persons, Especially Women and Children (ACTIP) adopted in 2015. All ASEAN States are also party to the UN Convention Against Corruption (UNCAC) which requires the establishment of criminal and other offences to cover a wide range of acts of corruption, and to periodically evaluate relevant laws and regulations.

Further, international human rights law provides guidance for developing, deploying and regulating digital technologies and the online space in order to ensure human rights throughout value chains and operations. In line *inter alia* with the UN Guiding Principles on Business and Human Rights, the UN Global Digital Compact and the UN Global Principles for Information Integrity, digital platforms have the responsibility to conduct human rights due diligence in order to identify and address human rights risks and impacts.[47] In accordance with the UN Guiding Principles on Business and Human Rights, the corporate responsibility to respect human rights exists independently of the capacity or willingness of States to discharge their own human rights obligations. While digital platforms are required to observe applicable domestic laws, they should at the same time align their operations with internationally recognized human rights norms, particularly in contexts of domestic or regional regulatory gaps.[48] Effective partnerships with CSOs including grassroots actors as well as law enforcement and financial institutions are key to implementing these obligations.

Finally, the non-punishment principle which was first articulated in the *Principles and Guidelines on Human Rights and Human Trafficking*,[49] and enshrined in article 14 of ACTIP, is a key normative standard that protects trafficked persons from re-victimization, including protection from prosecution for irregular migration, labour law violations or criminal acts that they would have committed as a direct consequence of being trafficked. In June 2025, AICHR and SOMTC launched the *ASEAN Guideline on the Implementation of the Non-Punishment Principle for Protection of Victims of Trafficking in Persons* which directs ASEAN Member States to apply the non-punishment principle, including where victims have committed serious crimes as a direct result of being trafficked, such as cyber-scamming, and to ensure their protection from punishment through administrative systems, migration and labour management systems and criminal justice systems.[50]



To bypass electricity and internet shutdowns, criminal syndicates are allegedly reliant on Starlink for digital access with dozens of receivers discovered in Myawaddy compounds. Photo credit : AFP

Human rights concerns in the compounds and beyond

The treatment endured by individuals within the context of scam operations is alarming. From all available evidence including the testimony of victims, the scam operations are sites of serious human rights abuses. An overarching issue identified in the monitoring undertaken by UN Human Rights is the shockingly high level of physical and psychological violence experienced by individuals in these compounds, where brutality is seemingly the norm. Victims also described an atmosphere of constant surveillance, threats, and fear which permeated the operations. Even in those cases where people entering the compounds may have known that they would be expected to conduct online fraud or other illicit activity, most were not aware that they would be detained in the centers and subjected to severe violence.[51]

Whether they enter the centres willingly or unwillingly, victims describe being refused permission to leave, in some cases even after they had completed the agreed contract period.[52] Independent investigations have confirmed that the majority of individuals released from the operations have been trafficked into compounds where they were forced to work on scams or in related jobs and that most people had experienced or witnessed torture and other serious human rights abuses.[53]

Drawing primarily from the testimony received by UN Human Rights, this section will describe in brief some of the serious human rights harm faced by victims within the scam compounds and beyond.

Arbitrary detention and deprivation of liberty

Depriving victims of their liberty in order to enforce compliance is a key feature of the scam compounds. Victims describe the centres in which they were forced to work as "prisons" with locked gates that only compound operators could exit.[54] Most victims reported that their passports were confiscated (often under various pretexts such as visa processing), leaving many victims – particularly those from countries outside the region who would require visas to enter and stay regularly – feeling trapped and unable to even contemplate escape.

In addition, many reported that their communication with the outside world was restricted, with several noting that personal electronic devices including laptops and mobile phones were confiscated. Many survivors detailed receiving threats and punishment if they attempted to contact friends, family, CSOs or international organizations.[55] Within the compounds there were strict restrictions on communication between different departments and accessing different floors of the compound.[56]

Torture and other cruel, inhuman or degrading treatment or punishment

All victims described receiving and/or witnessing severe mistreatment amounting to torture within scam compounds. Morning assemblies often included low-performing teams being publicly subjected to torture as a warning to others.[57] A victim from Sri Lanka related how those who failed to meet monthly scamming targets were subject to immersion in water containers (known as "water prisons") for hours.[58] Several victims described the presence of dark rooms (also called "meditation rooms" or other euphemisms) where people who had breached compound rules were confined for days in complete darkness.[59] Victims also recounted being forced to witness or even conduct torture as a means to ensure compliance; one Bangladeshi victim said that he was ordered to beat other workers[60] and a victim from Ghana recounted being forced to watch his friend being beaten in front of him.[61]

Deaths in the compound were frequently mentioned by victims. One Vietnamese survivor revealed that a friend of his had been killed in the compound, others described not hearing from their friends or loved ones and fearing they had been killed.[62] The discovery of the body of a young South Korean man in August 2025 was followed by witness testimony and physical evidence that he had been tortured to death in the compound.[63] Victims reported witnessing people losing their lives in failed escape attempts, including as a result of falling from balconies and roofs in the compounds.[64] In September 2025, a Chinese provincial court convicted traffickers for the killing of 10 people who disobeyed the compound operators or tried to escape centres in Kokang, Myanmar.[65]

Psychological torture was also common, victims recounted frequent threats including being threatened with organ harvesting and being told that they would never leave the compound alive.[66] Others described a pervading atmosphere of surveillance both at their workstations and in their living quarters, making them unsure what they could say or whom they could trust.[67] In order to deter escapes and further isolate victims, compound operators would tell victims that they would be subjected to immigration or criminal penalties if they left the centre. Failed rescue attempts were punished severely; one Vietnamese victim described how her sister was beaten, tasered and locked in a room with no food for seven days after she had tried to engineer her escape.[68]

Lack of an adequate standard of living: inadequate housing, food and medical care

Victims described severe sleep deprivation, forced to work over 16 hours (and up to 19 hours) on a daily basis and

being expected to work for a month or even several months without any days off.[69] Some victims were required to work through the night in order to access scamming targets in other time zones. Strict compound rules – which were enforced through physical violence - included not crossing legs while working, and being penalized for yawning, talking, or singing.[70]

Living conditions in the compounds were often inadequate – victims described small, cramped, overcrowded and unsanitary rooms.[71] Dormitories lacked access to adequate sanitary facilities, ventilation and at times even electricity as power outages were common in some centres.[72] In other cases, victims were forced to consume large amounts of coffee or to work in extremely cold conditions designed to keep them awake.[73] Food was also withheld as punishment for breaking compound rules or not achieving scamming targets and when available it was often inadequate or culturally inappropriate. One victim noted that his group was barely given any food over a period of 15-20 days and became extremely weak; "we could not even stand" he said.[74]

The closed and overcrowded environment in the compounds enabled the spread of respiratory diseases. Medical care was often inadequate or even non-existent; a survivor reported that the only treatment available was saline solution, with one report noting that trafficked persons were significantly overcharged for medical care in the compounds, where a single painkiller could cost $50.[75] Victims reported denial of access to contraceptives in the centres as well to treatment for sexually transmitted infections including as a result of rape.[76]

Victims reported not being able to access treatment even in serious health emergencies. In those cases where compound operators allowed victims to access medical facilities outside the centre, they first had to find or raise funds to cover the cost of the treatment.[77]

Wage theft, debt bondage and extortion

UN Human Rights heard from victims that they would only be presented with a written contract once they were in the compound; one victim from Bangladesh was forced to sign an 18-month contract requiring him to make $200,000 in profit for the company and to "agree" to heavy punishments for infractions.[78] Victims were typically unable to recoup much if any of the debts they had taken on either during recruitment, prior to entering the scam operations or those imposed on them once inside. Many described varying point deduction systems for minor infractions.[79] Failing to meet monthly scamming quotas resulted in spiraling "debts" that were owed to the operations. A Thai victim reported that scam management imposed steep financial targets of $9,500 per day to avoid fines, beatings, or even being "sold" to another compound with harsher conditions.[80] While most victims described receiving some wages, all those interviewed by UN Human Rights experienced a range of escalating deductions and none received the entirety of the promised salary.[81]

In some cases, in order to leave the compound, victims had to settle a "bill" purportedly to cover expenses for their recruitment and living costs; one victim was forced to pay over $3,000 before he was released, another was asked to pay $4,500.[82] Victims and their families have also related being asked for large ransoms in exchange for their release, with one victim being asked to pay $30,000 and reports of ransom demands for as much as $100,000.[83] In order to pressure families to pay extortionate ransoms, traffickers would videocall family members to watch their loved one being tortured.

Sexual violence and gendered concerns

Female victims described being subject to sexual abuse by compound operators and other workers[84] and male victims to sexual humiliation as punishment for infractions.[85] Survivors also reported being threatened with sexual violence and forced prostitution if they did not meet the scamming targets. Twelve women survivors released from scam compounds in Myanmar reported being raped and impregnated, while a pregnant Filipina survivor experienced physical violence and electrocution.[86] Victims also described witnessing forced abortions in the compounds.[87]

Sexual violence against female and male victims had reportedly increased dramatically since 2024, with cases received by CSOs of sexual abuse and forced prostitution by the criminal syndicates, highlighting the particularly vulnerable situation of certain nationalities (such as Ethiopian and Filipina women) to such abuse.[88] An increasing number of male victims have reportedly been targeted by compound operators for sexual assault and violence; a victim from Thailand recounted being explicitly asked to provide sexual services in exchange for money.[89]

Independent research conducted by CSOs with 40 female survivors highlighted that even women who were not subjected to sexual violence faced stigma and stereotyping upon returning home, leaving many unable or unwilling to seek help.[90]

Post-release: Like "escaping a tiger only to meet a crocodile"[91]

Most victims who manage to leave the compounds are not able to access effective and trauma-sensitive screening and identification procedures.[92] As a result, victims described being subjected to police arrest as well as immigration



Photo Credit : AFP

detention immediately after their release for periods ranging from days to many months.[93] Some also described inadequate conditions in police stations and immigration detention centres where they were held prior to relocation, including crowded and unsanitary conditions and lack of sufficient or adequate bedding. Others spoke of being subject to extortion in police or immigration detention.[94]

Victims reported receiving a range of immigration penalties in addition to detention including steep overstay fines, re-entry bans and being blacklisted from entering the country to which they had been trafficked, in some cases even after having cooperated with prosecutions.[95] In contrast, some victims described being involved in protection screening interventions. One victim from Myanmar who was rescued from a centre in the Philippines was housed in a safe location while waiting for the court proceedings.[96] Others were able to access screening in Thailand through its National Referral Mechanism (NRM) and receive official recognition as victims of trafficking, thereby lifting immigration penalties.[97] However, even individuals who were identified as trafficked persons were often left on their own to arrange and finance their return home without compensation or support.[98]

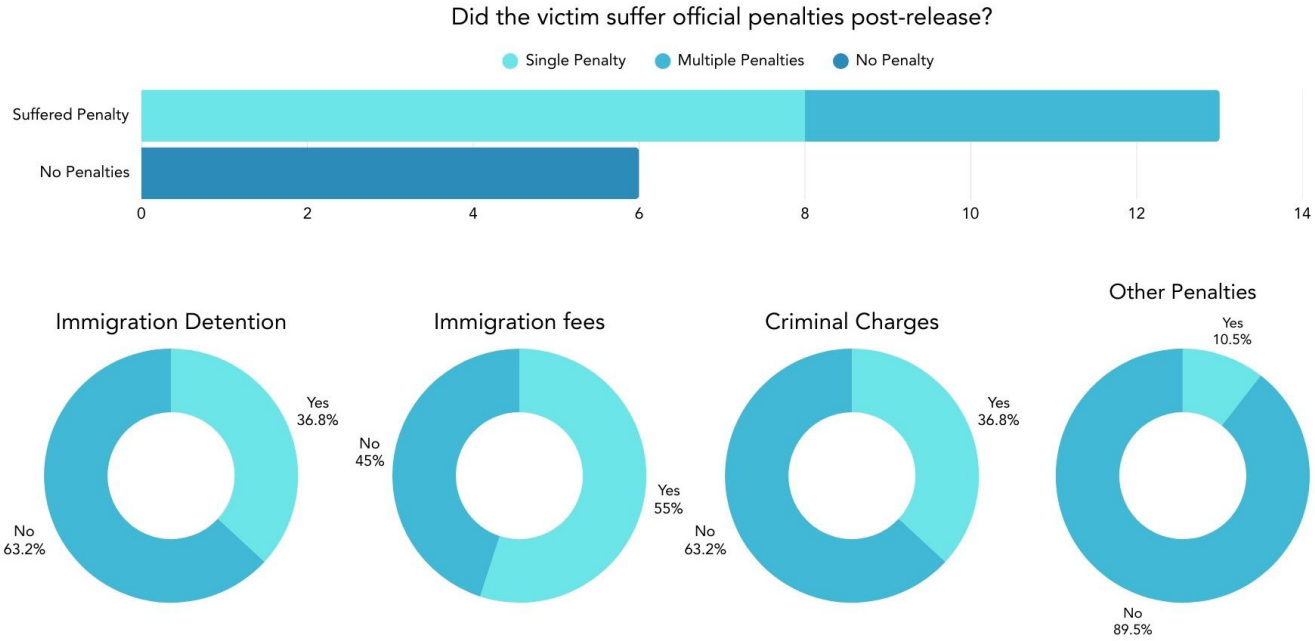
For victims who were unable or unwilling to return to their home countries, including those who feared persecution or other serious human rights violations, there appeared to be few available protection pathways including access to asylum, protection on human rights or humanitarian grounds or third country resettlement.[99]

On their return home, victims could be faced with administrative penalties for irregular migration or criminal penalties related to the crimes they committed as a direct consequence of being trafficked.[100] Many described patterns of disbelief and suspicion that characterized their interaction with authorities in their home countries after their return. CSOs in Thailand reported assisting some 34 victims who had been arrested and detained – sometimes for years – on criminal charges following their release from scam centres. In July 2025, the Chiang Rai Provincial Court cleared eight of the victims of charges including involvement with a transnational criminal organization, human trafficking, cyber-crime, and unlawful detention.[101]

While in the compounds, some victims related being forced to become "money mules" and to open bank accounts or provide details of their existing accounts that are then used by the syndicates to conduct financial fraud.[102] Experts also observed that victims whose bank accounts were compromised faced being barred permanently from accessing banking services.[103] A Thai victim who was forced to operate as a "money mule" related how even after she was rescued from the compound, she faced criminal charges related to the fraudulent activity on her bank accounts and described feeling as if she were "a floating house" – unstable and without security.[104]

Upon their release, many victims recounted feelings of shame for having been in the compounds and their reluctance to speak of their ordeal with friends or family stating that what they had done was "nothing to be proud of".[105] Many spoke of financial struggles and unemployment, exacerbated by the need to repay debts taken on at the beginning of their migration or those they had to pay to the compound owners

Figure 2: Post-release immigration penalties reported by victims



in order to secure their release. Some were considering migrating away from their home countries – in quantitative research for this report 70 percent of survivors expressed a desire to migrate again following their return from the scam operations.[106]

Others described struggling with complex mental and physical trauma. Many had depression, anxiety, post-traumatic stress disorder (PTSD), nightmares and severe insomnia on their return.[107] While some victims were able to receive mental health support provided by CSOs or UN entities, it is evident that the majority of returnees have been left on their own without access to adequate – or in many cases, any – psychosocial rehabilitation services. One survivor shared that they had contemplated suicide on their return, another that he feels he has "lost a significant part of [his] life."[108] Male victims were less likely to self-identify as victims while gender-responsive support was unavailable to most victims. Many spoke of facing stigma and hostility upon their return including being estranged from their family and stereotyped as criminals.[109] Victims also described struggling with physical health issues; one woman who had managed to return to Viet Nam was suffering from tuberculosis (TB) as a consequence of the unsanitary conditions she experienced in the compound.[110]

Upon their return, victims recounted being contacted by the intermediary who had first recruited them and fearing reprisals. A Bangladeshi survivor described being threatened by the broker who was from his community and still living there when the victim returned, while others related receiving threats from recruiters when they came home.[111] Victims also described facing threats and reprisals from debtors when they were unable to repay often substantial sums they had borrowed to finance their travel or their release.

Collusion and corruption

In the context of the regional scam operations, there have been noteworthy warnings by human rights experts about widespread corruption and impunity, where criminal syndicates are benefiting from collusion with government officials, politicians, local law enforcement, and influential business figures.[112] UN Human Rights has described corruption as being "deeply entrenched in the context of these lucrative operations."[113] UNODC has similarly described scam operations in the region as being "at the heart of the intersection between corruption, cybercrime and organized crime", noting specifically that "large-scale scam centre operations could not exist without some official complicity."[114] Corrupt practices included enabling the scam operations through action or inaction and benefiting (directly or indirectly) from the revenues generated through the operations.

In their testimony, victims related observing practices that may point to collusion in trafficking by immigration officials; including being picked out of or fast-tracked through immigration lines by officials who appeared to alert traffickers to their presence. Multiple victims described being met on arrival before immigration, directed to specific immigration lines and physically accompanied through the immigration process.[115] One victim was ushered through immigration at the airport in his origin country despite having an emigration restriction on his passport; when he arrived in the destination country the border official guided him to the recruiter.[116]

Victims described witnessing law enforcement officials entering the compounds while they were detained there,

often receiving payments from the compound managers and in some cases observing that police officers had themselves taken possession of victims' passports.[117] Survivors were told by the compound operators that they were "paying [the police] money" which deterred them from lodging official complaints. Reports as well as testimony received by UN Human Rights indicated that compound operators were alerted in advance to law enforcement raids or other monitoring activities that were being planned by the authorities, with survivors describing being moved to other buildings in the compound or to other operations both within and outside the country, as well as being forced to cease operations and remain hidden for the duration of the raid or inspection.[118]

Victims also reported being subject to corruption and extortion upon their release. One victim was asked by police officers who removed him from the scam centre to pay $100 for transportation and a further $100 to make a phone call.[119] Another victim reported being threatened with criminal penalties for irregular entry by officers in the immigration detention centre.[120] Yet another survivor recounted that during the rescue process, a police translator instructed him to write a statement declaring that no abuse or beatings had occurred while he was in the compound.[121]

Impunity and restrictions on civic space

Countries in which scam centres operate have traditionally seen themselves as places of origin of trafficked persons rather than destination countries where the violations take place. Transit countries and countries of origin have struggled to understand the nuances of a relatively new and little-known form of trafficking. In this context, building the technical capacity and summoning the political will to ensure effective governance and protection measures have proved challenging. Trafficking in persons for forced criminality continues to be absent as an offence in most counter-trafficking laws and regulations in the region and there is a widespread lack of comprehensive and effective prosecution of perpetrators.[122] Some preventive measures taken by countries of origin, such as restricting tourist visas and other barriers to freedom of movement, shifted trafficking pathways to more dangerous modes and routes.

Relatedly, concerns have been raised in relation to limitations on freedom of expression and shrinking civic space in affected countries. Restrictive regulations governing civic space and fears of reprisal for working on issues considered sensitive by Governments have had a chilling effect on civil society's ability to work on trafficking in the context of scam operations. Such gaps hamper victim assistance and protection efforts including access to justice, in addition to punishing whistleblowing and preventing public exposure of scam operations and related concerns.[123] Investigative journalists have been charged with incitement and journalists and other public figures have been targeted by Strategic Lawsuits Against Public Participation (SLAPPs).[124] Recent sweeping cuts in development funding leading to the closure of independent media outlets in the region has furthered hindered efforts to investigate and report on scam operations.[125]

Misuse of digital technology

The exploitation of digital technology is a central feature of the business model of scam operations in the region.[126] Reports indicate that criminal syndicates have created stable networks consisting of vast physical and internet communication technology (ICT) infrastructure in the region. While an understanding of the intersections of digital technology and trafficking remains limited, reports indicate that there is a wide and growing use of Artificial Intelligence (AI) across scam operations; for generating scripts and multilingual content, identifying scamming targets, producing deepfakes for impersonation purposes, and facilitating money-laundering. Even as scams often necessarily involve direct human interaction with targets, their infrastructure is increasingly driven by automation.[127] Evidence also indicates that criminal actors are deploying AI models to scrape social media platforms in search of individuals who display indicators of financial difficulties or employment-related distress, in order to exploit these vulnerabilities for fraudulent recruitment.[128] Through removing linguistic and cultural barriers, AI enables traffickers to reach a wider pool of potential victims. Experts have noted that recruitment using deception and coercion via digital platforms is likely to be the most common usage of generative AI by traffickers.[129]

Social media has been reported as a primary pathway for recruiters to communicate with victims. Facebook was the most widely used platform, with victims also reporting using TikTok, YouTube, Snapchat, Instagram, Xiaohongshu, Zalo, Viber and WeChat. Victims reported contact being made with recruiters who had posted jobs on regular employment groups on these platforms.[130] Recruiters typically shifted conversations from public posts on social media to messaging apps such as Telegram, WhatsApp, Signal and LINE or country-specific platforms like Yellow in Viet Nam that use end-to-end encryption.

Civil society groups and victim advocates have reported challenges in using social media to warn communities about scam operations, alleging that lack of adequate content moderation and unbalanced algorithms can result in the removal of accounts set up to disseminate counter-trafficking messages while traffickers continue to exploit social media to recruit victims.[131] A lack of content moderation expertise in local languages and inability to reach competent human reviewers to contest decisions have also been reported.[132]

PART TWO



Photo Credit : AFP

Searching for solutions through a prevention lens

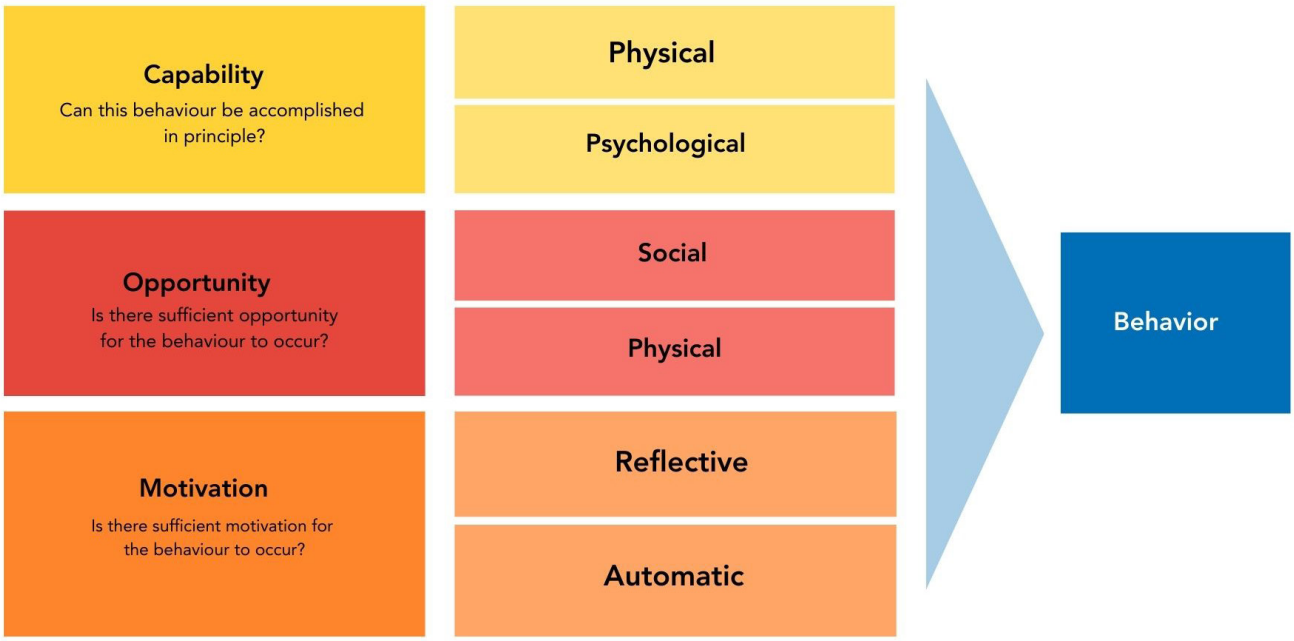
The search for an effective response to cyber scam operations in South-East Asia represents a good example of what is known as a "wicked problem"[133] which lacks both clear definitions as well as readily achievable solutions at national, regional and global levels. The sheer number of stakeholder groups involved renders the problem incredibly complex to describe and delicate to address effectively. These include transnational criminal syndicates, law enforcement and criminal justice actors, local and central governments, armed groups, civil society actors, international organizations and a range of individuals who have been trafficked or otherwise entered into the compounds to perpetrate the scams. Adding to the complexity are the deep roots of scam operations in socio-economic and governance concerns in the region including inequality, corruption, impunity, deficits in civic space and weak digital regulatory regimes. One expert noted the difficulty of being able to address the issue accurately "because we've never seen the whole picture at once."[134]

In such a complex and evolving context, centering the lived experience of victims is a critical diagnostic tool as well as an important normative principle. From the prevention perspective, behavioural insights can help to answer this crucial question: *two years after the alarm was first raised globally, why are people continuing to be recruited into cyber scam centres in the region?* In other words, how can the issue of recruitment into these operations be understood through a behavioural lens with a view to prevention.

Using behavioural science

Understanding and addressing human behaviour plays an integral role in effecting critical human rights change. In its practical application, behavioural science can be used to identify what drives people's decisions and behaviours ("why people do what they do") rather than relying on assumptions of how people should or would act.[135]

Figure 3: COM-B model, adapted by UN Human Rights from Michie, S., Van Stralen, M. M., & West, R. (2011). The behaviour change wheel: A new method for characterising and designing behaviour change interventions. Implementation Science, 6(1).



One explanatory framework widely used to generate behavioural insights is the Capability, Opportunity, and Motivation Model of Behaviour (COM-B model)[136] which suggests that for a particular behaviour to occur, three essential components are required:

- *Capability* is defined as the individual's psychological and physical capacity to engage in the activity concerned. It includes having the necessary knowledge and skills.
- *Motivation* is defined as all those brain processes that energize and direct behaviour, not just goals and conscious decision-making. It includes habitual processes, emotional responding, as well as analytical decision-making.
- *Opportunity* is defined as all the factors that lie outside the individual that make the behaviour possible or prompt it.

A key foundational insight of behavioural science is that behaviour is largely shaped by context, including social, economic, normative or environmental cues. Integrating behavioural insights into trafficking prevention efforts offers significant potential to strengthen existing policy and protection frameworks.

Bringing in systems analysis

At the same time, behavioural science alone may not offer complete answers to the complexity inherent in the "wicked problem" of cyber scam operations in South-East Asia.

Trafficking into forced criminality in the region is a complex and deeply entrenched issue, involving multiple and diverse stakeholders, rooted in pervasive structural protection gaps and enabled by constraining social norms and stereotypes.[137] While behavioural insights reveal why individuals make certain choices, looking at the issue from the perspective of the system shows how those choices are themselves constrained and embedded in larger structures.

In order to address the complexity of abuse and exploitation within the scam operations at a systemic level, counter-trafficking responses need to include but also go beyond individual level interventions – targeting individual perpetrators or providing immediate support to survivors – and seek at the same time to significantly alter the structural, social, political and economic components of the larger system that enables and perpetuates human rights abuses and violations. These components include migration governance systems, macroeconomic and labour market dynamics and digital regulatory regimes.[138] Systems analysis can therefore help to understand how behaviours are produced, shaped, reinforced, constrained and sustained in the broader context, allowing the identification of leverage points for effective intervention.[139]

Recruitment

This search to understand the systems within which the scam operations exist necessarily leads to an inquiry into the broader context of labour migration in the region. Every year millions of workers migrate within and across borders in Asia in search of employment opportunities that promise higher wages and more favorable horizons than they have access to at home. In a global context of accelerating economic inequality and fragile job creation as well as slowing growth and high debt burdens, young people in countries around the world are increasingly trapped in cycles of unemployment and underemployment. [140]

In testimony received from survivors, one woman from the Philippines described losing her job during the COVID-19 pandemic and applying to more than 100 openings without success, until she received an immediate response from what turned out to be a scam operation.[141] Another survivor from Myanmar was also laid off during the pandemic and returned home to help his parents who owned a tourism business and were deep in debt. "I was carrying the whole family on my shoulders," he explained.[142] A Bangladeshi survivor recalled earlier attempts to migrate overseas, recounting experiences of fraud by licenced recruitment agents who took money for employment offers that never materialized.[143] Facing stagnating prospects at home, many seek to move away to urban areas or across borders in search of more stable jobs, decent work and aspirational incomes.

The next section looks broadly at recruitment into labour migration in the region and then details some trends related to recruitment into scam operations. While it is difficult to draw universal conclusions about the recruitment strategies deployed by scam operations, parallels with recruitment into labour migration hold important lessons from a behavioural systems lens.

Labour migration pathways

Recruitment into labour migration in Asia, particularly within low- and medium-waged sectors, usually takes place through the following routes:
(a) direct recruitment through online or offline job sites;
(b) use of official government employment services; and
(c) engagement of private intermediaries that include licensed recruitment agencies as well as social networks.

The process of labour migration recruitment is complex and often opaque, leaving aspiring migrants wholly dependent on multiple layers of private recruitment agencies, brokers and other intermediaries to provide them with necessary information associated with overseas employment such as the existence of job opportunities and support for travel, work and residence visas. Migrants seeking employment abroad are at risk of deception about the job and workplace conditions from employers and intermediaries.[144]

Private recruitment plays a dominant role in labour migration pathways to and within Asia. A study conducted by the International Trade Union Confederation (ITUC) on recruitment practices in Bangladesh, for example, found that as many as 78 percent of migrants first heard about their job through an informal intermediary sub-agent in their home areas. Reporting data from a survey of 1,200 migrant workers in Thailand from Cambodia, Lao PDR, and Myanmar, the ILO noted that slightly more than one fifth migrated through a non-registered broker.[145] In another survey, over 50 percent of respondents from the Philippines and 36.2 percent of migrant workers from Viet Nam reported migrating through private recruitment agencies.[146] At the same time, laws and policies regulating the establishment and management of recruitment agencies have been reported to lack effective safeguards.[147]

The role of technology in facilitating labour migration recruitment is well established and growing in the region and beyond, with an ever-increasing amount of "migrant technology" solutions being developed to impact the recruitment space and to re-balance information asymmetries, as well as increasing pressure on the recruitment industry to digitize.[148] It has been noted that in some sectors and countries, the use of internet platforms has overtaken traditional methods of job brokering as the primary mechanism for the recruitment of migrant workers.[149] At the same time, human rights concerns tied to labour migration recruitment through online platforms mirror longstanding issues in offline recruitment such as the proliferation of deceptive or misleading job postings as well as lack of transparency, accountability and regulation, which are amplified by the scale, speed, and opacity of digital systems.

It is important to note in addition that, given the opaque nature of migration governance in the region and beyond, migrants may not actively seek out officially sanctioned migration pathways or approach formal remediation mechanisms, fearing that this may increase their risk of being subjected to penalty, corruption and/or intimidation by frontline authorities and therefore preferring to put their trust in informal pathways. To add another constraining contextual factor, particularly in the case of countries that have not traditionally hosted significant migrant worker populations, are long-standing concerns of weak labour oversight mechanisms in the region including insufficient inspection capacity, gaps between law and practice, large informal workforces, and fragile worker voice and remedy mechanisms.[150]

While it is important to underline that the pathways into the scam compounds of South-East Asia lead not into labour migration but instead into trafficking and exploitation, it is clear at the same time that aspiring migrants may be unlikely or even unable to distinguish easily between the two.[151] Where precarity is entrenched in recruitment pathways that are overwhelmingly informal or otherwise unregulated, people – especially young people – who feel compelled to leave their homes in search of opportunities are at high risk of predatory and fraudulent recruitment practices both offline and online.

Recruitment into scam operations

This section will describe the recruitment process into scam compounds, including as related by victims in their testimony. In addition to the pathways described below, reports also indicate that individuals inside scam compounds were pressured to lure new recruits in exchange for the possibility of release or a financial reward.[152] One Vietnamese survivor described being told that he could earn $300 – 500 for recruiting a new person into the compound.[153] Another survivor described announcements being made during "morning assemblies" of incentives of up to $2000 for each person recruited, while a third was told that in order to leave the compound he had to recruit two people to take his place.[154] Others were coerced into participating in "marketing materials" that were later used for recruitment purposes; one survivor from Bangladesh was filmed in a recruitment video and later learned that it was this video that had persuaded other Bangladeshi victims to accept the fraudulent job offer.[155] Additionally, it is important to note that some reports have also been received of victims simply being abducted or kidnapped into the operations.[156]

Who is being recruited?

Reporting of the issue in earlier years suggested recruiters sought mostly highly educated victims who were multilingual and drawn into skilled technology-facing jobs. Research undertaken for this report reveals a more nuanced picture and indicates that victims came from diverse educational backgrounds: five percent of survivors reported having only primary education, 21 percent secondary education, 16 percent some college, and 58 percent a graduate degree. This aligns with expert observations that recruitment has increasingly diversified to include individuals from both lower- and higher-education backgrounds, originating from rural and urban areas, and across a spectrum of professional backgrounds. Challenging the assumption that all or most victims are highly educated, one expert explained, "[w]e have spoken to many survivors who don't even know how to use a phone."[157]

The majority of survivors described facing acute socio-economic pressures which led them into fraudulent recruitment pathways – including to pay off familial debts, send children or siblings to school and afford medical treatment for elderly parents.[158] Widespread financial downturns in

the context of the COVID-19 pandemic left many people without jobs or underemployed in sectors that did not offer adequate remuneration.[159] In quantitative research, at the time of their recruitment, 47 percent of survivors were either unemployed or employed part-time while 74 percent were actively searching for better opportunities.[160]

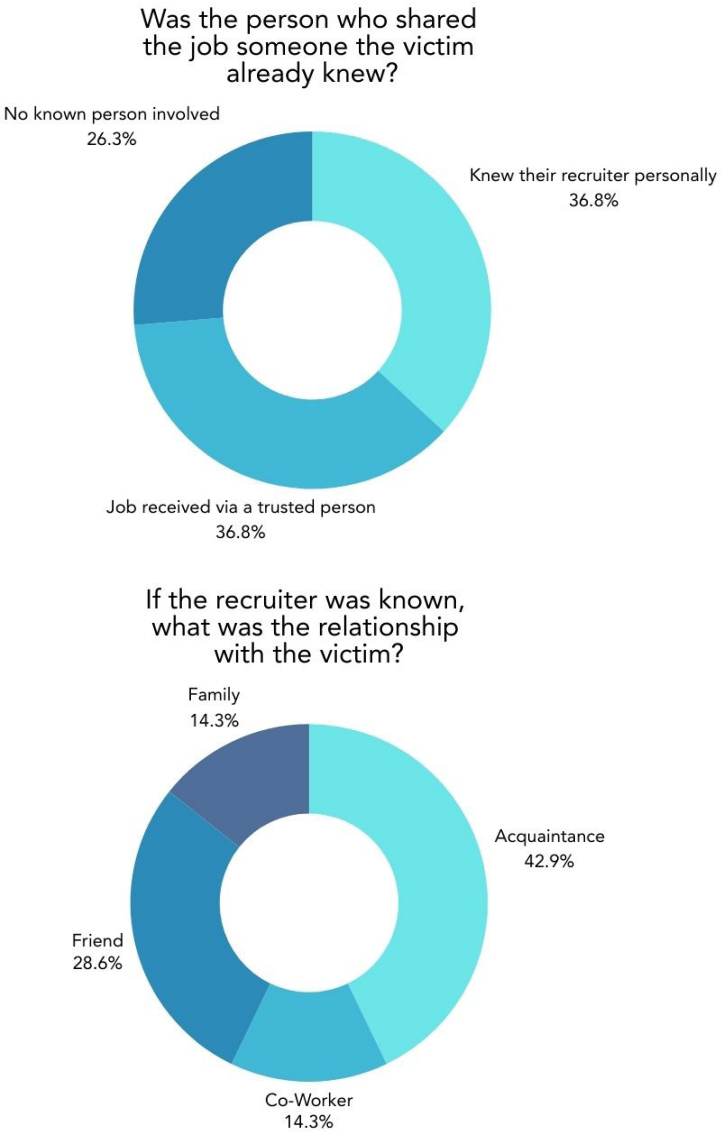
Under this pressure, individuals felt they had few options when making the recruitment decision; one victim from Myanmar recalled wondering to himself as he decided on the job offer; "What is there to lose?".[161] In quantitative research, the promised salary emerged as the most persuasive factor influencing victims' decisions to accept a job. Two-thirds of survivors (68 percent) reported that the promised pay was "the most important" or a "very important" factor in their choice.[162] A secondary critical motivator was the desire to leave their current circumstances; more than half (53 percent) ranked this as important, most often citing a lack of financial opportunities at home as the reason. A survivor from South Africa noted that her financial situation meant that, even if she did not want to, she "had to be brave enough to go abroad."[163]

Recent trends indicate that recruiters are pivoting to target groups in particular situations of vulnerability. Recruiters operating from within Yangon, Myawaddy and the Golden Triangle SEZ in Lao PDR are reportedly targeting Myanmar nationals fleeing conflict and destitution.[164] A victim from Myanmar, who was unemployed and in hiding after joining the Civil Disobedience Movement (CDM), reported that he took a job offer in Shwe Kokko even after learning that it was a scamming job as it was his only option.[165] Other victims were from ethnic or religious minority groups in their home countries, which added an additional layer of vulnerability to their experience, particularly when they were unwilling or unable to return to their home countries.[166] Children from these minority groups, some as young as fourteen, were also targeted.[167] One expert noted that trauma among displaced and crisis-affected populations can affect decision-making and risk assessment, causing individuals to act in ways that may seem irrational.[168]

Why are people being recruited?

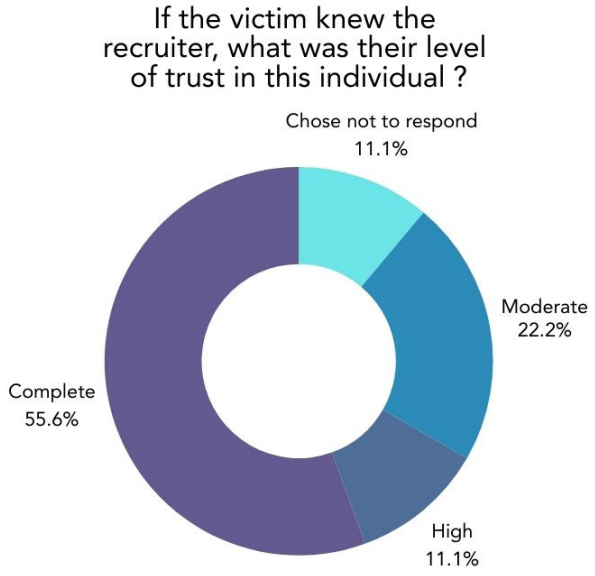
Trust emerged as a key consideration in explaining why victims chose to embark on the recruitment pathway into scam operations. The issue of trust is critical in the context of recruitment more broadly, particularly because low and medium-waged labour migration in the region often involves uncertainty, risk, and limited access to reliable information. As one expert noted "People will continue despite red flags if the opportunity is encouraged by a trusted friend or family member."[169]

Figure 4: Relationship with recruiter reported by victims



In quantitative research, nearly three-quarters of victims reported being recruited through the actions of a trusted source – i.e. 37 percent of victims were recruited by someone that they knew personally and trusted, while another 37 percent were first alerted to the job through someone that they trusted. In a separate mixed-methods study based on the testimonies of 62 survivors of scam operations, 79 percent of respondents similarly said they found the job through acquaintances.[170] An expert described the increasing use of female recruiters in scam operations, noting that they tended to be trusted more than male recruiters.[171]

Figure 5: Trust in recruiter reported by victims



Of the victims who knew their recruiter personally, 67 percent said they had a complete or very high level of trust in the person. Trusted recruiters included family members, childhood friends, co-workers, community acquaintances or newer connections built online through social media or gaming platforms. In some cases, the recruiter had previously provided legitimate labour migration advice or even regular opportunities to the victim.[172] In others, private recruitment agencies – usually operating informally but also including licensed agencies – have been complicit in recruiting victims into scam operations.[173] Following his release from Myanmar's KK Park compound in February 2025, one victim launched a successful legal challenge in Kenya's Employment and Labour Relations Court against the recruitment agency that had fraudulently promised him a customer service position in Thailand.[174]

Victims who were recruited through job postings on social media described having confidence in the postings because they were first shared by trusted sources – where the source was unaware of the true nature of the job offer. One Thai woman, for example, said her partner forwarded her a Facebook post advertising employment in a restaurant job. A friend who was regularly employed in Cambodia confirmed the recruitment process outlined by the scammer as similar to her own recruitment process, thereby increasing the trust the victim had in the offer.[175]

Sometimes, however, the trusted source was aware that the job offer was fraudulent. A survivor from Bangladesh, who was working in Dubai's hospitality sector, was recruited into a scam compound by his roommate.[176] Another survivor from India was recruited by a friend from his village whom he had known for five years. The friend video-called him to show him the office where he "worked" and assured the survivor that the job would enable him to provide for his disabled father.[177] One victim was recruited by her sister; after escaping, the survivor chose not to report her sister fearing it would destroy her family.[178]



Photo credit : Ezra Acayan/ Getty Images

Choosing to take up the offer together with others also increased confidence in the decision to migrate and created a sense of security and trust.[179] One survivor from South Africa explained that she felt reassured because a neighbor from her community had applied for the same job and traveled with her.[180] Another survivor from Viet Nam trusted her recruiter – a former co-worker – who even accompanied her during the first leg of the journey.[181] A survivor from India traveled alongside a friend from his village and others from his country,[182] while a Thai survivor reported that a crucial factor in his accepting the offer was that his friend had also been recruited and would accompany him to the workplace.[183]

How are people being recruited?

In quantitative research, just over one-quarter of survivors reported receiving job offers after a "cold" employment search on social media where there was no personal involvement of someone they trusted. In these cases, victims described the confidence they developed in the process because of seemingly professionalized recruitment procedures; including multi-stage interviews,[184] employment "tests",[185] requests to submit official documents,[186] prompt and frequent communication and receiving videos that purportedly showed a decent workplace and satisfied employees.[187] A survivor from Sri Lanka recalled being asked to submit videos testing his spoken English and typing skills,[188] another survivor from Bangladesh was asked to attend an interview via Zoom where he underwent tests on his typing speed.[189] Both before and after entering the compounds, victims described interacting with – often large – "Human Resources" departments.[190]

In each case, the jobs advertised were familiar and aligned with the aspirations of the victims. They included professional positions with a high degree of specialized knowledge such as computer programming or language interpretation as well as more generalized roles including sales and marketing positions, restaurant and hospitality work, amorphous roles in "administration", porters and drivers. Recruiters also persuaded victims by offering a range of attractive offers – lucrative trading opportunities,[191] promises of a sponsored work-and-study program,[192] an investment scheme for cashew cultivation,[193] or a paid sightseeing trip.[194] Job offers were often complemented by appealing benefits packages including coverage of travel expenses.[195] At the same time, experts suggest that criminal syndicates have learned that unrealistically high salaries might alert potential victims and have adjusted the promised remuneration to the job profile.[196]

Victims expressed that they were persuaded by the availability of short-term flexible contracts with built-in trial periods and the freedom to leave at any point. One victim from South Africa was told she could quit within three months without penalty.[197] Another victim from Zimbabwe was offered a six-month contract with the promise that it could be extended or he could leave if he did not like the job.[198]

Recruiters also frequently sought to create a sense of urgency, pressuring victims to make quick decisions that left little time for reflection or verification. Experts observed that victims were told they must decide immediately, with promises such as guaranteed visas if money was transferred quickly, or constant approaches by recruiters until a commitment was made.[199] In some origin countries, victims reported that after the job opportunity was introduced recruiters demanded that they depart within days.[200] One victim recalled being pressured to resign from his current employment by the recruiter and afterwards feeling he had no choice but to carry on with the offer. His family had mortgaged their farm and pond and taken out a bank loan to provide the $3,000 fee to the recruiter, adding to the pressure on him.[201] Recruiters often facilitated victims' travel as an incentive to accept job offers. They frequently arranged flight tickets and travel to the airport and persuaded victims to leave quickly, including on "cheaper and quicker" tourist visas, sometimes with false assurances that these would later be converted into work permits.[202] In one case of a child victim, the recruiter forged an identification card with a different name and date of birth so that the victim was able to leave the country unaccompanied.[203]

Recruiters often appeared to befriend victims, sometimes offering emotional support or even bringing in their own family members to build trust. One survivor from Viet Nam described how two individuals spent 3-4 months frequenting the restaurant where he worked, claiming to be from his home community. After gaining his confidence, they offered him a "restaurant job," which led to his sale into a scam compound.[204] In another case, a victim from Myanmar was introduced to the recruiter's mother who falsely reassured both the victim and his brother that her daughter (the recruiter) was paid well and satisfied with the job.[205]

Using the COM-B model, it is possible to outline how each component of the framework is activated along the recruitment pathway that leads victims into scam operations:

- **capability** is enhanced through seemingly professionalized processes and advertising familiar job roles;
- **opportunities** are leveraged through the exploitation of socio-economic pressures/unemployment and trusted networks; and
- **motivation** is shaped through manufactured social proof and the targeting of at-risk populations.

Preventing recruitment into scam operations

Prevention interventions in the counter-trafficking context are often heavily weighted towards public awareness campaigns, often on the assumption that "more information" is a silver bullet.[206] Raising the awareness of potential victims about the risks associated with trafficking – so that more people know about the existence of scam operations or their recruitment methods for instance – is undoubtedly an important element of prevention strategies.[207] In quantitative research for this report, it was found that overall awareness of the existence of scam operations was low; 79 percent of victims (who came from multiple regions) reported that before being trafficked they did not know scam compounds existed. One survivor from India reported that not only did he not know about scam operations, he was also not aware in which country his final destination was actually located.[208]

Behavioural insights

Understanding how and why people make decisions can help explain why they make what could be considered unexpected or undesirable choices. At the same time, in the absence of grounded insights into actual behavioural drivers, overconfident assumptions about information provision risk rendering prevention strategies ineffective or even counterproductive.[209] A behavioural lens is particularly useful in the context of counter-trafficking policy and practice where unexamined assumptions can play an oversized role and may unintentionally weaken the effectiveness of prevention interventions. Traditional counter-trafficking approaches may also focus primarily or even solely on shutting down criminal networks and, while undeniably important, responses that concentrate only on prosecution may fail to embrace a holistic perspective, including understanding how cognitive biases and structural pressures render individuals susceptible to being trafficked in the first place.

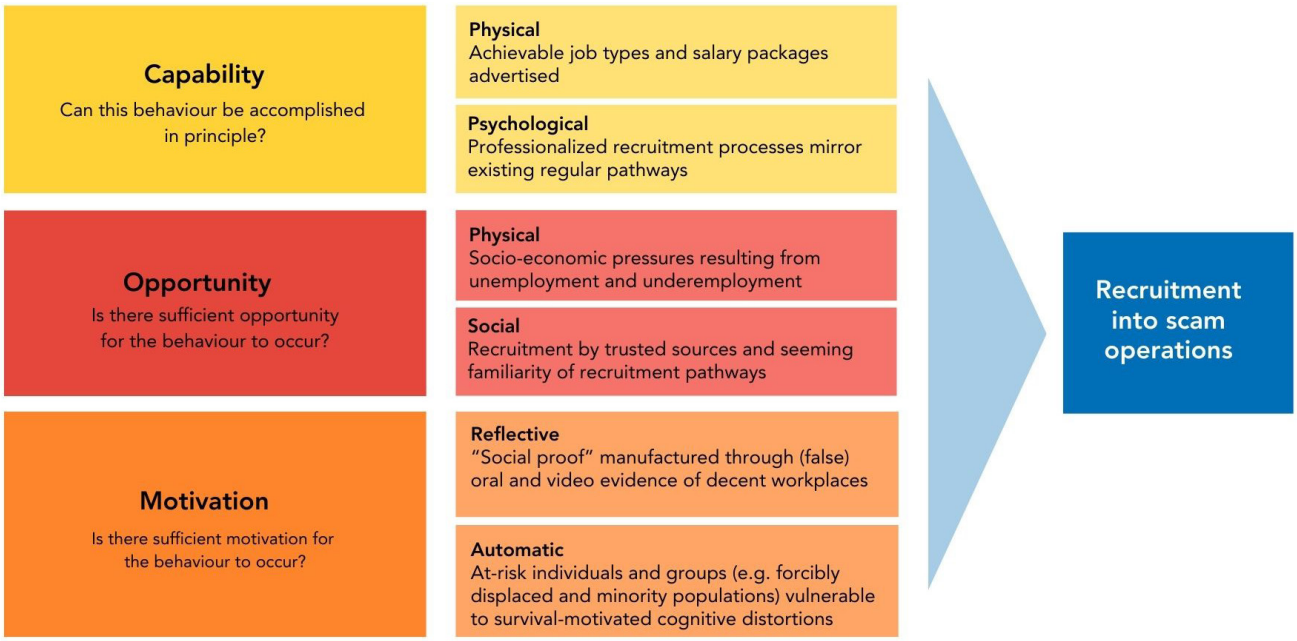
Research has shown that human behaviour is not simply the result of deliberate reasoning. People tend to rely on mental shortcuts ("heuristics") and intuitive, automatic and often unconscious processes to simplify and accelerate decision-making. This can sometimes lead to errors in judgement (known as biases). **Cognitive biases** affect the way people think and can prevent them from taking what would customarily be considered rational decisions. Common cognitive biases that are relevant in the specific context of recruitment into scam operations include

- ***confirmation bias*** (the tendency to seek, interpret, and remember information in ways that confirm pre-existing beliefs);
- ***sunk cost effect*** (the tendency to continue an endeavor, or continue investing in a decision, because of previously invested resources);
- ***information avoidance*** (where people tend to avoid seeking out information when they expect it to be unpleasant); and
- ***overconfidence bias*** (the tendency to overestimate one's abilities, knowledge, or control over situations).[210]

In research for this report, of those survivors who were aware scam operations existed, some were only aware of them in very nebulous terms and many believed they would not personally be at risk.[211] One Vietnamese victim admitted he had heard rumors about compounds but dismissed the risk because he had heard they only existed outside his country and the job he was offered did not require him to leave Viet Nam.[212] A victim from China recalled that during her passport application she was required to sign documents warning of trafficking risks in Myanmar, Cambodia, and Thailand – but she signed these without reading them and did not interpret the warnings as relevant to her.[213] Even in cases where red flags may have appeared in the recruitment process – such as being offered inflated salaries or not being required to provide education certification – they were dismissed or ignored by victims.[214] As one expert explained: "People are aware [of the risks], but the temptation of a well-paying job overseas is strong… they tell themselves they can try it, and if it doesn't work, they can always come back. But once inside, they lose control."[215]

Seen through a behavioural lens, it emerges that effective prevention responses to scam operations would need to address all three COM-B components. The quantitative and qualitative research findings emphasize that structural socio-economic drivers, reinforced by cognitive biases, consistently override awareness barriers. Knowledge provision campaigns alone are therefore unlikely to produce effective changes in behaviour. While there may be a place for increasing capability through strategic awareness-raising interventions, more contextualized research is needed into where these messages should be delivered, who delivers them and what they should say.

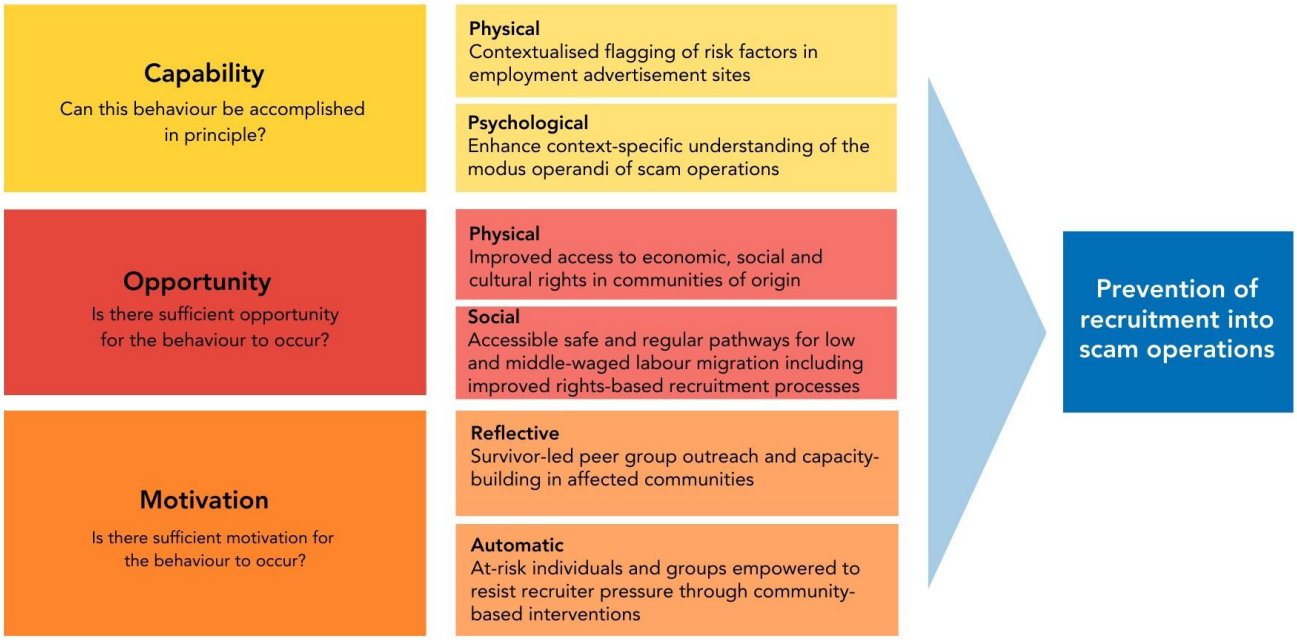
Figure 6: COM-B mapping of behavioural enablers that **facilitate** fraudulent recruitment into scam operations



At the same time, whilst scam operations currently exploit physical and social opportunities, these same contextual channels represent potential leverage points for disruption through policy, technology, and institutional mechanisms that change the environment of available opportunities. Such leverage points could include:

- increasing the availability and accessibility of safe labour migration pathways;
- enhancing transparency and accountability in cross-border recruitment through regulation and oversight; and
- verifying job postings and flagging suspicious recruitment patterns on social media platforms.

Figure 7: COM-B mapping of behavioural barriers that could prevent fraudulent recruitment into scam operations.



Conclusions



Photo credit : Getty Images



"I want to say that it is not a matter of being greedy or stupid. It can really happen to anyone."[216]

A human rights-based response to trafficking places the rights, dignity, safety, and well-being of victims of trafficking and other human rights abuses and violations at its core. Such a response should be centered in the non-punishment principle, ensuring legislation and policy responses that prevent trafficked persons from being prosecuted, detained or punished for the irregularity of their entry or residence or for the activities they are involved in as a direct consequence of their situation.[217] The brutality experienced by victims inside scam operations necessitates an urgent need for torture and trauma rehabilitation including medical care and psychosocial recovery measures.

Essential elements of a human rights-based response include robust *prevention* measures that address root and underlying causes such as poverty, discrimination, gender inequality, and unsafe migration pathways, in combination with *protection* measures including early and accurate identification of victims and the provision of comprehensive protection and assistance, including safe shelter, medical and psychosocial care, legal aid, and opportunities for recovery and reintegration.[218] A rights-based approach also calls for access to justice and effective remedies, including adequate compensation, while ensuring that the prosecution of traffickers upholds due process and does not re-victimize survivors. Such an approach rests on fundamental human rights principles of non-discrimination, access to information and the active participation of victims in shaping counter-trafficking policies and programmes.[219]

This report makes clear that powerful behavioural enablers are facilitating fraudulent recruitment into scam operations. People in South-East Asia and far beyond are faced with a range of reinforcing individual and contextual factors which constrain the choices and decisions that are available to them, leading them into exploitation and abuse. Rather than facing disbelief, stigmatization and further punishment, victims require protection, care and rehabilitation as well as pathways to justice and redress. At the same time, the report has identified that scam operations are embedded within systemic weaknesses in the political economies of the region, including entrenched socio-economic inequality, governance coordination gaps as well as challenges related to collusion, corruption and impunity.

Taken together, these insights lead to a behavioral systems change approach which looks at behavior not just as an individual choice, but as something that is also shaped by a system of actors, components and rules.[220] Such an approach has much in common with human rights-based inquiry which seeks to understand systemic challenges and opportunities in the fulfilment of international human rights law and standards, centering rights-holders and

identifying the obligations of duty-bearers to respect, protect and fulfil human rights. States, and where relevant other stakeholders, should seek therefore to improve victim protection measures, tackle corruption and impunity and enhance safe labour migration pathways while prosecuting organized criminal networks and ensuring cross-border enforcement, recognizing these as interconnected elements of a comprehensive and holistic solution rather than addressing each issue in isolation.

The comprehensive recommendations for a human rights response contained in the UN Human Rights briefing paper entitled *Online scam operations and trafficking into forced criminality in South-East Asia: recommendations for a human rights response*[221] should continue to be considered and implemented by States, regional bodies such as ASEAN and AICHR, as well as private sector actors and other relevant stakeholders in regard to:

- guaranteeing human rights at the centre of anti-trafficking responses including through legal frameworks which embed the non-punishment principle;
- implementing effective identification of victims of trafficking and other human rights violations and abuses;
- ensuring victim protection and access to effective remedies;
- enhancing rights-based governance of migration; and
- establishing cooperation and coordination mechanisms in the region and beyond.

The following key messages, focused on protection and prevention, are offered to States and other relevant stakeholders to complement the guidance contained in the earlier report, in the spirit of seeking practical human rights-based responses. Prevention and protection efforts are mutually reinforcing; together they can enable early identification and assistance, empower victims and reduce the risk of re-trafficking. Much of this guidance has been informed by recommendations made directly by survivors in the context of UN Human Rights' interviews.

Key messages

Protection

States, and relevant stakeholders where applicable, should

- Ensure that responses to trafficking for forced criminality in the region take place within the framework of international human rights law and standards, bringing in applicable domestic law where relevant such as anti-trafficking laws and legislation related to the prevention of torture.
- Explicitly recognize forced criminality within anti-trafficking laws and regulations and ensure access to justice including that victims are able effectively to appeal non-recognition decisions; access to urgent protection and referral to appropriate services should not be reliant on formal identification.
- Guarantee the non-punishment principle for victims of trafficking, including waiving penalties for criminal activities committed as direct consequences of trafficking as well as waiving immigration-related offences for victims, and building the capacity of front-line officials in this regard.
- Set up predictable and human rights-based cooperation arrangements between countries of origin, transit and destination, as well as UN entities and CSOs where relevant, to ensure timely, safe and effective rescue operations.
- Enable the access of independent human rights monitors including NHRIs, CSOs and UN entities to police and immigration detention centres as well as shelters and other holding places where released victims are located.
- Put in place accessible trauma-informed, victim-centered individualized screening procedures in languages understood by the victims.
- Ensure that timely and secure pathways are available to victims with international refugee and human rights protection needs, including through guaranteeing the principle of non-refoulement and setting up support mechanisms to address risks of reprisals or re-trafficking.
- Address through a protection-sensitive lens all situations in which people remain stranded in destination or transit countries and provide accessible referrals to consular assistance, health and social service providers.
- Urgently set up physical, psychological and trauma rehabilitation support for survivors in countries of destination, transit and origin which should not be contingent on victims being required to reside in designated shelters. Ensure that this support responds to the needs of victims, including tailored mental health support and gender-responsive care for victims of sexual exploitation and abuse.
- Guarantee that, regardless of whether victims have had access to screening, identification and referral and support services in transit or destination countries, these should be made available to them when they return to their countries of origin.
- Ensure appropriate and accessible reintegration measures which are targeted to the types of abuse and exploitation suffered by victims, including providing legal aid, protection from threats and retaliations, as well as livelihood support.
- Provide effective access to rights-based criminal, civil and/or administrative remedies in countries of origin, transit and destination as appropriate.

Prevention

States, and relevant stakeholders where applicable, should

- Resource and support trusted and community-based actors, such as survivor-led groups, CSOs and local health workers, where possible including the families of survivors, to take the lead on direct, grassroots outreach to individuals and groups considered at risk of trafficking into scam operations.
- Ensure that, instead of generic warnings, awareness activities are accessible, concrete and available to communities through the media they access and trust. Ensure also that warnings and travel restrictions to risk areas are relevant, context-specific and enable time for reflection and do not result in blanket travel bans that push migration to unsafe routes.
- Strengthen knowledge on trafficking risks through relevant educational curricula, including a practical focus on indicators and identification of warning signs of trafficking into forced criminality.
- Increase the availability and accessibility of safe labour migration pathways and enforce regulations and oversight on private recruitment agencies to ensure transparent, accountable and rights-based labour migration practices.
- Support concrete collaborative efforts between digital platforms, financial institutions, national authorities including law enforcement agencies, NHRIs and civil society actors including survivor-led groups in order to address the misuse of technology enabling trafficking into scam operations.
- Strengthen efforts to combat corruption recognizing that human rights principles including transparency and accountability are essential components of successful and sustainable anti-corruption strategies and ensure due diligence in identifying and eradicating public sector involvement or complicity in human trafficking.
- Ensure that independent media, human rights defenders and CSOs working on various dimensions of trafficking into scam operations in the region can carry out their legitimate work free from interference, in line with international human rights standards.
- Continue multistakeholder efforts to understand and address the human rights implications of scam operations in the region through a behavioural systems approach.

Endnotes

1 OHCHR Special Procedures, UN experts urge immediate human rights-based action to tackle forced criminality in South-East Asia scam centres, 21 May 2025.

2 See for example UNODC, Inflection Point: Global Implications of Scam Centres, Underground Banking and Illicit Online Marketplaces in South-East Asia, April 2025; Global Initiative against Transnational Organised Crime (GI-TOC), Compound Crime: Cyber Scam Operations in South-East Asia, May 2025.

3 OHCHR, Online scam operations and trafficking into forced criminality in South-East Asia: recommendations for a human rights response, August 2023.

4 In this regard, the General Assembly has observed that the term "survivor" or "survivors" is not defined in the Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, but in some Member States it is used to acknowledge that victims of trafficking in persons can recover or have recovered from the trauma that they have endured. Resolution on improving the coordination of efforts against trafficking in persons, A/RES/78/228, 22 December 2023, footnote 22.

5 See AL LAO 1/2025. Communications are letters sent by the UN Special Procedures to Governments and others which report on allegations of human rights violations received by the mandate holders. Communications can be accessed at https://spcommreports.ohchr.org/

6 In May 2025, a joint statement by UN experts noted that "hundreds of thousands of people of various nationalities are trapped and forced to carry out online fraud". UN Special Procedures, UN experts urge immediate human rights-based action to tackle forced criminality in South-East Asia scam centres, 21 May 2025. See also INTERPOL, Crime Trend Update: Human Trafficking Fueled Crime Centres, June 2025 which notes that "the centres are estimated to have drawn in hundreds of thousands of human trafficking victims"; USIP, Transnational Crime in South-East Asia: A Growing Threat to Global Peace and Security, May 2024, p.66. Victims originated from all over the world, particularly from South-East Asia (Indonesia, Lao PDR, Malaysia, Myanmar, the Philippines, Singapore, Thailand and Viet Nam), East Asia (China (including Hong Kong Special Administrative Region, Taiwan Province of the People's Republic of China), Japan and the Republic of Korea), South Asia (Bangladesh, Bhutan, India, Nepal, Pakistan, Sri Lanka), as well as various countries in Africa, Middle East, North America and South America. See inter alia AL OTH 17/2025.

7 BBC, 'I need help': Freed from Myanmar's scam centres, thousands are now stranded, 26 February 2025. An enforcement action in Myawaddy centre KK Park in October 2025 reportedly led to the release of over 1,000 individuals in just one day. Cyber Scam Monitor, What's Happening at KK Park? 25 October 2025.

8 As one illustrative example, reports have highlighted that of the 6,364 individuals removed from the Golden Triangle SEZ in Lao PDR between September 2022 and December 2024, only 25 (17 men and eight women) were formally recognised as victims of trafficking. Similar concerns have been raised in other affected countries. See US Department of State, Trafficking in Persons Report: Laos, 2025.

9 GI-TOC (2025), p. 13. The scam centre workforce reportedly also contains lower-level criminals attracted to the possibility of easy profits. In the absence of adequate screening, however, it is unclear whether such individuals were also subject to forced labour and violence in the compounds and could be considered victims of human rights violations and abuse. Reports also indicate in some locations the entrenching of scam operations into local economies such as the provision of cleaning and catering services through local service providers.

10 GI-TOC (2025), p. 3. See also UNODC, Transnational Organized Crime and the Convergence of Cyber-Enabled Fraud, Underground Banking and Technological Innovation in South-East Asia: A Shifting Threat Landscape, October 2024. The criminal syndicates themselves are transnational, with links to organised crime groups in China, Japan, Korea and other countries in Asia as well as beyond the region.

11 INTERPOL, Crime Trend Update: Human Trafficking Fueled Crime Centres, June 2025.

12 UNODC, Inflection Point: Global Implications of Scam Centres, Underground Banking and Illicit Online Marketplaces in South-East Asia, April 2025, p.9.

13 AL THA 3/2025.

14 Interpol, Crime Trend Update: Human Trafficking Fueled Crime Centres, June 2025.

15 MYN -001; VTN-002. Note that this anonymized coding refers to individual victims interviewed by UN Human Rights. Observers report that compounds along the Thailand-Myanmar border average in size over 13 acres each. Washington Centre for Human Rights, Myanmar's 100,000-Strong Scam Centres: Human Trafficking Crisis Fueled by Military Complicity, September 2025.

16 VTN-003.

17 GI-TOC (2025), p. 5 Experts have also noted that many operations are purposely mobile in their design; they can reportedly be disassembled and relocated within 24 hours. KII.

18 KII. Individuals in East and South-East Asia lost an estimated $37 billion to cyber-enabled fraud in 2023, with 62 percent of victims reporting high stress levels and only 22 percent ever managing to recover any of their money. Global Anti-Scam Alliance, State of scams in Southeast Asia 2025 report, 2025. 73 percent of adults in the US have directly experienced scams such as credit card fraud, ransomware or online shopping scams and in 2024 Americans lost an estimated $10 billion to these scams. Pew Research Centre, Online Scams and Attacks in America Today, 31 July 2025. See also The Diplomat, Cracking Southeast Asia's Scam Economy, 15 November 2025. Additionally, reports indicate that victims in the UK lost an estimated GBP 106m in the 2024 financial year to romance scams. BBC, Victims of romance fraud tricked out of £106m in past year, 17 October 2025.

19 GI-TOC (2025), p.10.

20 The Diplomat, Cracking Southeast Asia's Scam Economy, 15 November 2025.

21 USIP (2024), p. 26.

22 The Manila Times, 400 workers in scam hub fall, 28 February 2025.

23 KII.

24 China Daily, China, Myanmar, Thailand hold ministerial-level meeting on telecom and cyberspace, 6 July 2025.

25 In this context, UNODC has observed concerns around "selective and politically motivated law enforcement, notifying traffickers ahead of police raids or intervening in judicial proceedings to block investigations". UNODC, The nexus between cybercrime and corruption, October 2025, p. 36. See also GI-TOC (2025), p. 8. While hotlines to report abuse and seek rescue have reportedly been set up in affected countries, survivors and CSOs have in some cases raised concerns around the efficacy of such mechanisms.

26 For example, CSOs in Viet Nam report that the majority of individuals convicted for trafficking in the context of scam operations are low-level perpetrators - first-time offenders who acted as recruiters or transporters. Blue Dragon Children's Foundation, Scamming to survive: Shedding light on the trafficking of Vietnamese people into forced criminality, September 2025. In 2024, Viet Nam promulgated the Law on Prevention and Combat of Trafficking in Persons which added provisions on trafficking in persons for the purpose of "forcing the commission of criminal acts" and potentially relieving sanctions on victims who had committed unlawful acts as a direct consequence of their trafficking. Information received from the Government of Viet Nam.

27 The Guardian, China court sentences 11 people to death over alleged role in family-run Myanmar scam operations, 30 September 2025.

28 ASEAN, 17th ASEAN Ministerial Meeting on Transnational Crime, Labuan Bajo, Indonesia, 21 August 2023.

29 ASEAN, Joint Media Statement: The 4th ASEAN Digital Ministers' Meeting and Related Meetings, Singapore, 1 - 2 February 2024.

30 ASEAN, Joint Media Statement - The 5th ASEAN Digital Ministers' Meeting and Related Meetings, Bangkok, Thailand, 16 - 17 January 2025.

31 ASEAN, 18th ASEAN Ministerial Meeting on Transnational Crime, Vientiane, Lao PDR, 28 August 2024.

32 ASEAN, 19th ASEAN Ministerial Meeting on Transnational Crime, Melaka, Malaysia, 10 September 2025.

33 ASEAN Intergovernmental Commission on Human Rights (AICHR) Press Release on Human Rights, Telecommunication Network Fraud and Online Scamming, 26 September 2025.

34 INTERPOL releases new information on globalization of scam centres, 30 June 2025,

35 GOV.UK, UK and allies sanction human rights abusers, 8 December 2023; the Diplomat, US, UK, Canada Sanctions Target South-East Asian Scam Operations, 11 December 2023; the Record, UK sanctions nine linked to cyber trafficking in South-East Asia, 9 December 2023.

36 U.S. Department of the Treasury, Treasury Sanctions Cambodian Tycoon and Businesses Linked to Human Trafficking and Forced Labor in Furtherance of Cyber and Virtual Currency Scams, 12 September 2024.

37 Council of the European Union, Myanmar/Burma: EU lists three individuals and one entity responsible for scam operations entailing serious human rights violations and threatening the peace, security and stability of Myanmar and the region, 29 October 2024; the Diplomat, EU Announces Sanctions on Myanmar Militia Involved in Online Scams, 30 October 2024.

38 U.S. Department of the Treasury, Treasury Sanctions Burma Warlord and Militia Tied to Cyber Scam Operations, 5 May 2025; the Irrawaddy, US Imposes Sanctions on Myanmar Border Militia Over Cyber Scams, 6 May 2025.

39 US Department of the Treasury, Treasury Sanctions South-East Asian Networks Targeting Americans with Cyber Scams, 8 September 2025. On 18 September 2025, a bill was introduced into the US House of Representatives (H.R.5490 - Dismantle Foreign Scam Syndicates Act) to create an interagency Task Force to dismantle and shut down transnational criminal syndicates perpetuating mass online scam operations.

40 US Department of the Treasury, U.S. and U.K. Take Largest Action Ever Targeting Cybercriminal Networks in South-East Asia, 14 October 2025.

41 Information received from the Government of Cambodia.

42 See also OHCHR, Recommended Principles and Guidelines on Human Rights and Human Trafficking: Commentary, p, 37, 2010.

43 "Trafficking in persons" shall mean the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation. The consent of a victim of trafficking in persons to the intended exploitation shall be irrelevant where any of the means have been used. See United Nations Protocol to Prevent, Suppress and Punish Trafficking in Persons Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime (Palermo Protocol, 2000), Article 3(a) and 3(b). See also CEDAW/C/GC/38, para 12.

44 SRI-001; VTN-003. The Universal Declaration of Human Rights (UDHR) is a key component of international standards regarding the elimination of all forms of slavery (Article 4). Further, Article 8 of the ICCPR prohibits slavery, the slave trade, servitude and forced labour. CSO research revealed similarly that "[t]hirty-two of the 58 survivors interviewed reported being sold into compounds, witnessing the sale of other people or described being threatened by managers with being sold to another compound." Amnesty International (2025), p. 11.

45 Palermo Protocol, Articles 6 and 14.

46 ILO Forced Labour Convention, 1930 (No. 29); ILO Private Employment Agencies Convention, 1997 (No. 181).

47 Human rights due diligence refers to the responsibility of private actors to respect human rights by taking adequate measures for their prevention, mitigation and, where appropriate, remediation. Due diligence may also encompass other commitments or activities to support and promote human rights, which may contribute to the enjoyment of rights. See inter alia OHCHR and UNESCO, Protecting critical voices: Guidance for human rights impact assessments on digital platforms, 2025.

48 UN, Guidance of the Secretary General: Human Rights Due Diligence for Digital Technology Use, Call to Action for Human Rights, May 2024, p.8.

49 Recommended Principles and Guidelines on Human Rights and Human Trafficking, Principle 7; guidelines 2.5 and 4.5, see also 7.5.

50 ASEAN Secretariat, ASEAN Guideline on the Implementation of the Non-Punishment Principle for Protection of Victims of Trafficking in Persons, 2025, pp. 24-25,

51 UN Human Rights heard from victims who had met people in the centres who knew they would be working in scams but chose to go there intentionally because they desperately needed the money that they believed was being offered. MYN-001. In one case, UN Human Rights heard from a victim who had entered the scam centre voluntarily in the hope of being able to rescue a family member who had been detained there for months. VTN-003. CSOs have reported that individuals who voluntarily entered scam operations with prior awareness of the nature of the work described experiencing the same forms of abuse and coercion as those who had been deceived during recruitment. KII; Freedom Collaborative (2025), p. 10.

52 AL OTH 18/2025, AL KHM 1/2025, AL LAO 1/2025.

53 Inter alia AL OTH 18/2025, AL KHM 1/2025, AL LAO 1/2025. Also Amnesty International (2025), pp. 10-11.

54 A survivor from Zimbabwe noted that the compound he was taken to had "windows that appeared like a prison from the inside but normal from the outside." ZIM-001.

55 SYR-001; THL-003.

56 MYN-001; AL OTH 18/2025.

57 THL-001.

58 The Sunday Times, Job hunters tormented and traumatised by cybercrime gangs in Myanmar, 29 December 2024.

59 MYN-001. A Thai survivor described being hung by one arm in a dark room for a day after attempting to help other victims in the centre. THL-002.

60 BAN-002.

61 IOM, Tricked into a Life of Online Scamming in South-East Asia, 29 August 2025.

62 VTN-001.

63 Yonhap News Agency, South Korea vows swift repatriation of remains of late student after torture death in Cambodia, 11 October 2025.

64 VTN-003. Khmer Times, Foreigner jumps to death at Bavet casino, 14 June 2024.

65 The Guardian, China court sentences 11 people to death over alleged role in family-run Myanmar scam operations, 30 September 2025.

66 IND-001. Also see Adolfo Arranz, Poppy McPherson, Devjyot Ghoshal and Han Huang, Scammed Into Scamming, Reuters, 18 September 2025.

67 Al Jazeera, Abused, exploited: How two Africans became trapped in a cyber-scam in Laos, 30 May 2025.

68 VTN-003.

69 SRI-001; VTN-003. Also see The Straits Times, Tasered, beaten, long hours without pay: Malaysian man's 11-month ordeal in Myanmar scam centres, 27 February 2025.

70 SRI-00.

71 THL-001; SOA-001.

72 SOA-001; ZIM-001.

73 SRI-001; VTN-003.

74 IND-001.

75 GI-TOC (2025), p. 7.

76 Freedom Collaborative (2025), p. 10.

77 SYR-001.

78 BAN-002.

79 These could include charges for "air-breathing", 'keyboard-wearing" and 'floor-wearing". See Humanity Research Consultancy, Cyber Slavery in the Scamming Compounds, September 2022.

80 THL-005.

81 SOA-001.

82 SRI-001; ZIM-001.

83 CHN-00. Also China Daily, Another HK victim held in SE Asia 'scam farm' returns home safely, 17 January 2025.

84 VTN-003. See also Ling Li, Chong Liu and Ivan Franceschini, The Gendered Life Cycle of Forced Criminality: Female Victims in Southeast Asia's Online Scam Industry, Critical Asian Studies, December 2025.

85 Global Anti-Scam Organization, From Paradise to Peril: The Disturbing Rise of a Chinese-Run Scam Network in Mondulkiri, 24 March 2025.

86 The Nation, Women 'raped, impregnated' in Myanmar scam centres seek Thai aid, 21 March 2025; Business Mirror, 100 Pinoys rescued from Myanmar scam hubs reveal torture, rape, abuse from human traffickers, 27 March 2025.

87 THL-002; also see HaRDstories, Scammed, enslaved, arrested: The triple tragedy of Thailand's cyber scam victims, Immanuel Foundation Thailand, 3 September 2024.

88 KII.

89 THL-005; KII.

90 KII.

91 THL-002.

92 AL LAO 1/2025.

93 VTN-003.

94 VTN-004.

95 CHN-001.

96 MYN-001.

97 SRI-001; SOA-001.

98 BAN-002 See also HaRDstories (2024).

99 SYR-001.

100 KII.

101 THL-005; Mekong Independent, Thai court rules eight defendants were trafficking victims, not criminals, 22 July 2025.

102 THL-003.

103 KII.

104 THL-004.

105 MYN-001; VTN-003. Another survivor recounted telling his family only that he had lost his passport in Bangkok and received his embassy's assistance to return to his home country. SRI-001.

106 Other victims related hearing from people they knew in the centres that were returning in the hope of being able to earn money as they continued to struggle financially once they had returned to their home countries. A survivor from Bangladesh related the story of a Ugandan survivor who had worked with him in the scam compound; his colleague was unable to access reintegration support on his return, was unemployed and homeless and considered returning to the scam compound because he could at least get food and make some money. BAN-001; MYN-001.

107 SOA-001; VTN-003; also see Freedom Collaborative (2025), p. 9.

108 THL-005; THL-002.

109 THL-004.

110 VTN-002.

111 BAN-002; IND-001. One victim was forced to leave their country and seek asylum abroad due to threats and violence from the recruiter.

112 Joint Statement by the Special Rapporteur on contemporary forms of slavery, Special Rapporteur on trafficking in persons, and Special Rapporteur on Cambodia on immediate human rights-based action to tackle forced criminality in South-East Asia scam centers, 19 May 2025.

113 OHCHR (2023), p. 9. See also OHCHR, Corruption and Human Rights: a practical guide, 2025.

114 UNODC, The nexus between cybercrime and corruption, October 2025, pp. 31 and 34.

115 BAN-001; BAN-003; ZIM-001.

116 BAN-001. Another victim alleged concerns of collusion in his trafficking by airline representatives at a transit airport. ZIM-001.

117 THL-001. Also see Amnesty International (2025).

118 SYR-001; Amnesty International (2025); Al Jazeera, Abused, exploited: How two Africans became trapped in a cyber-scam in Laos, 30 May 2025.

119 VTN-003.

120 ZIM-001.

121 Global Anti-Scam Org, Chinese Citizen Trapped in Scam Compound Near Cambodia's National Stadium Rescued After Weeks of Captivity, 13 March 2025.

122 Reports indicate that authorities in Cambodia, Lao PDR and Myanmar have not arrested or prosecuted scam compound operators or owners and have not investigated or prosecuted any cases related to trafficking that occurred within SEZs. See US Department of State, Trafficking in Persons Report 2025, country reports.

123 AL KHM 1/2025.

124 **Nguyện Công Bằng**, An increasingly SLAPP-happy region, Asia Democracy Chronicles, 20 October 2025; Nation Thailand, Court accepts defamation suit filed by businessman against MP Rangsiman Rome, 6 October 2025.

125 International Federation of Journalists, Asia-Pacific: Media development must be supported amid US funding fallout, 10 March 2025. The Global Initiative Against Transnational Organised Crime has similarly noted concerns around 'lawfare'- the instrumentalization of legal systems through vexatious lawsuits and SLAPPs to intimidate and silence journalists, researchers and whistle-blowers. GI-TOC, The sanction effect: Designating cyber scam networks helps protect those exposing them against legal challenges, 28 October 2025.

126 It has been noted that "[t]his is not a remote human rights issue for NGOs to fix. It is a profound systemic threat that tech firms, AI companies, social media platforms must take seriously as part of their reputational, legal, and financial risk matrix." The Diplomat, Why Tech Firms Can't Afford to Ignore South-East Asia's Cyber Scam Slavery Crisis, 7 October 2025.

127 UNODC has observed in this context that criminal groups based in the region currently prefer to utilize human models for the purposes of various fraud schemes due to significant inadequacies in the present state of real-time deepfake software, while noting that AI-generated content is constantly improving. UNODC (2024), p. 8. See also UNODC, Emerging threats: The intersection of criminal and technological innovation in the use of automation and artificial intelligence in the cybercrime landscape of South-East Asia, September 2025.

128 UNODC (September 2025), p. 16.

129 OSCE and Bali Process Regional Support Office, Policy Brief. New Frontiers: The Use of Generative Artificial Intelligence to Facilitate Trafficking in Persons, 2024, p. 6.

130 THL-001; THL-002; BAN-002.

131 Some survivors recounted that their recruiters continue to operate openly on social media platforms despite efforts to report and block these individuals. BAN-001. In a positive move, the Philippines Department of Migrant Workers signed a memorandum of understanding in July 2025 with TikTok Philippines aimed at bolstering TikTok's content moderation systems in order to flag and remove scam accounts and promote verified and trustworthy job-related content.

132 KII. One Bangladeshi survivor noted that scam recruiters continued to operate on the Facebook group through which he had been recruited, despite his attempts to flag the operations. BAN-001.

133 A "wicked problem" describes a complex issue that is hard to solve because of its interconnected causes, competing stakeholder interests, and the absence of a single, definitive solution. Efforts to address one dimension of the problem often generate unintended consequences. See Rittel, Horst W. J. & Melvin M. Webber (1973). "Dilemmas in a General Theory of Planning", Policy Sciences, Vol. 4, No. 2.

134 KII.

135 For example, UNICEF's Behavioural Drivers Model seeks to incorporate "the critical idea that the key to designing effective social and behaviour change programmes lies in an in-depth understanding of the elements that influence a person's decisions and actions away from pre-conceived ideas and assumptions." See also Atkins, L., Francis, J., Islam, R., O'Connor, D., Patey, A., Ivers, N., Michie, S. (2017). A guide to using the Theoretical Domains Framework of behaviour change to investigate implementation problems. Implementation science, 12(1), 77.

136 Michie, S., Van Stralen, M. M., & West, R. (2011). The behaviour change wheel: a new method for characterising and designing behaviour change interventions. Implementation science, 6(1), 42. In similar vein, UNICEF's Behavioural Drivers Model groups three important levers of change – Psychological, Social and Environmental.

137 See the Systems Map developed by UN Human Rights in the StoryMap that accompanies this report.

138 The mandate of the Special Rapporteur on Trafficking has advocated in a similar vein for a "system- building" approach to addressing trafficking, including building and strengthening social welfare and access to livelihoods, changing social behaviour and improving holistic legal and justice systems. A/65/288, paras 26-27.

139 Experts have noted that many systems are best understood through a holistic approach, focusing on the fundamental rules, interactions, and emergent properties that arise from the system as a whole. For instance, if the objective is to bolster the effectiveness of a social movement, it would be important to concentrate on the key rules that shape behavior, model how individuals interact, and comprehend the emergent properties (e.g., marches, viral social media posts, violence, advocacy, misinformation). See Diaz Del Valle, Chaning Jang, Steve Wendel, Behavioral systems: Combining behavioral science and systems analysis, Busara Groundwork, January 2024, p. 29.

140 ILO has reported that the 2023 youth unemployment rate in East Asia, South-East Asia and the Pacific was higher than that of 2019. This contrasts with global trends and represents a change of direction from the period prior to the COVID-19 pandemic, when economic growth rates – and associated job creation for youth – had been more robust in these regions. Globally, 20.4 per cent of youth were not in employment, education or training (NEET), with regressive trends in this regard seen most sharply in regions such as the Arab States, North Africa and sub-Saharan Africa. International Labour Organization, Global Employment Trends for Youth 2024: Decent work, brighter futures, Executive Summary, 20th anniversary edition.

141 KII.

142 MYN-001.

143 BAN-003.

144 In one qualitative study of labour migration corridors between Sub-Saharan Africa and the Gulf, domestic workers described how they were entirely ignorant of the countries to which they were being sent by private intermediaries ("connection men"). Vani Saraswathi, "Ill-prepared and uninformed, Ghanaian women risk it all for jobs in the Gulf" in A/78/180, footnote 23.

145 ILO, Recruitment fees and related costs: What migrant workers from Cambodia, the Lao People's Democratic Republic, and Myanmar pay to work in Thailand, 2020, p. 19. The same study found that some 14 percent migrated with the help of friends or family, about the same number as used officially licenced agencies, noting also that recruitment through social networks does not necessarily lead to less exploitation or lower financial costs.

146 ADBI, OECD, ILO, Labor Migration in Asia: Fair Recruitment, Training, and Development, 2025, p. 27

147 ILO, Fair recruitment of Lao migrant workers: A comparative review with international labour standards and guidelines, 25 August 2025. See also Special Rapporteur on the human rights of migrants, Protection of the labour and human rights of migrant workers, 14 July 2023, A/78/180, para 27.

148 ILO, Promoting fair and ethical recruitment in a digital world: lessons and policy options, 2020.

149 ILO, Use of digital technology in the recruitment of migrant workers, 2021, p. 31.

150 See ILO and the International Finance Corporation (IFC), Annual Report: An industry and compliance overview for 2022-23 - Better Factories Cambodia, 2023.

151 The mandate of the Special Rapporteur on trafficking in persons has noted that trafficking in persons and migration often share the same "migratory space", noting that there is a strong causal link between restrictive immigration policies and trafficking. A/65/288, para. 24.

152 See also Freedom Collaborative, Deceived, Detained and Overlooked: Trafficking of East Africans into South-East Asia's Cyber-Scam Industry, October 2025, pp. 6-7.

153 VTN-001.

154 MYN-001; BAN-001.

155 BAN-002.

156 KII.

157 KII.

158 CSOs in Viet Nam report, for example, that provinces with high income poverty, out-migration and informal labour rates have the highest number of victims in scam operations. Blue Dragon Children's Foundation, Scamming to survive: Shedding light on the trafficking of Vietnamese people into forced criminality, September 2025.

159 A Sri Lankan survivor who held a degree in human resources spoke of losing his job as a travel agent during the pandemic and surviving on ad hoc manual labour jobs in the construction industry at the time he was recruited. Other survivors echoed this experience. SRI-001; THL-001.

160 A survivor from Thailand noted the constraints that she faced in accessing suitable employment because she only held a vocational certificate. In such a situation she felt compelled to seek out opportunities abroad. THL-004.

161 THL-001.

162 A survivor from Bangladesh noted that the promised salary for a computer operator role was more than five times higher than the salary he was receiving at the time, working as an engineer in a textile factory. BAN-001.

163 SOA-001.

164 GI-TOC, p. 12. See also Office to Monitor and Combat Trafficking in Persons, Human Trafficking and Cyber Scam Operations, US Department of State, June 2023.

165 The Irrawaddy, Sex, Drugs and Cyber Scams: Inside Myanmar's Notorious Online Crime Hub, 8 May 2024.

166 For example, information received by UN Human Rights indicates that ethnic Hmong and Cao Dai religious minority individuals from Viet Nam as well as individuals from the Syrian Alawite Christian community were fraudulently recruited into scam operations.

167 Testimony confidentially received from eight victims from ethnic and religious minority groups who were children at the time they were recruited.

168 Informal summary report of OHCHR expert workshop, April 2025.

169 KII.

170 Ivan Franceschini, Ling Li, Yige Hu, Mark Bo, "A new type of victim? Profiling survivors of modern slavery in the online scam industry in South-East Asia." Trends in Organized Crime, 6 November 2024.

171 KII.

172 Freedom Collaborative (2025), p. 7; South First, Trapped, tagged, and trafficked: How a Kerala man was sold into a Chinese-run scam ring near Myanmar border, 6 August 2025.

173 Humanity Research Consultancy, Uncovering the spread of human trafficking for online fraud into Laos and Dubai, July 2024, p. 5; KII. Reference is made to the labour migration recruitment section above, to explain the trust that aspiring migrants are likely to have in recruitment agencies as well as the challenges in regulation and oversight of such agencies, leaving jobseekers unable in many cases to distinguish a 'regular' agency from a fraudulent one.

174 The Guardian, 'I broke completely': how jobseekers from Africa are being tricked into slavery in Asia's cyberscam compounds, 9 September 2025; 254 News, Kenyan trafficking victim wins Sh5 million after nightmare trip to Myanmar, 22 November 2025.

175 THL-004.

176 ZIM-001.

177 IND-001.

178 KII.

179 THL-001; THL-003.

180 SOA-001.

181 VTN-003.

182 IND-001.

183 THL-001.

184 THL-004.

185 IND-001.

186 THL-004.

187 THL-004.

188 SRI-001.

189 BAN-001.

190 MYN-001.

191 The Straits Times, Tasered, beaten, long hours without pay: Malaysian man's 11-month ordeal in Myanmar scam centres, 27 February 2025.

192 Aljazeera, Abused, exploited: How two Africans became trapped in a cyber-scam in Laos, 30 May 2025.

193 Global Anti-Scam Org, From Investment Dream to Nightmare: A Chinese Citizen's Harrowing Ordeal in Cambodia, 20 June 2025.

194 Straits Times, Two Malaysians rescued from human trafficking syndicate in Laos, 18 March 2025.

195 THL-004; THL-002; THL-001; BAN-001.

196 KII.

197 SOA-001.

198 ZIM-001.

199 KII.

200 KII.

201 BAN-001.

202 BAN-001 See also The Sunday Times, Job hunters tormented and traumatised by cybercrime gangs in Myanmar, 29 December 2024.

203 Written statement of a 16-year-old victim confidentially received by UN Human Rights.

204 VTN-001.

205 MYN-001.

206 The mandate of the Special Rapporteur on trafficking in persons has noted that awareness-raising campaigns appear to be the most common prevention measures implemented, owing to the lower complexity of designing and implementing such campaigns and resulting in a "plethora" of large-scale campaigns in many countries. A/65/288, para 44.

207 In 2024, for instance, Viet Nam implemented a nationwide campaign entitled Skills to identify and prevent online scams to protect people in cyberspace in 2024. Information received from the Government of Viet Nam.

208 IND-001; CSO reporting of victim testimony similarly noted that East African survivors stated that they did not realize they had left Thailand and entered Myanmar until they began conversing with others who were in the scam compounds. Freedom Collaborative (2025), p. 8.

209 The Special Rapporteur on trafficking in persons has also cautioned that preventive measures developed on the basis of inaccurate information about the context and target group would be ineffective or even have an adverse impact on the human rights of trafficked persons. Ibid., paras 47, 60.

210 See UNICEF, Behavioural Insights - Applying and testing solutions inspired by behavioural science, 2022, p.2.

211 CHN-001; VTM-001.

212 VTN-004.

213 CHN-001.

214 THL-004.

215 KII.

216 Ivan Franceschini, Ling Li and Mark Bo, Scam: Inside South-East Asia's Cybercrime Compounds, 2025; VTM-003.

217 OHCHR, Recommended Principles and Guidelines on Human Rights and Human Trafficking (2002), Guideline 4.8.

218 Report of the Special Rapporteur on trafficking in persons, especially women and children, Joy Ezeilo, 9 August 2010, A/65/288, paras 15-20. See also See also CEDAW/C/GC/38, paras 39-41,

219 OHCHR Principles and Guidelines on Human Rights and Human Trafficking, 2002; see also OHCHR Principles and Guidelines on Human Rights and Human Trafficking Commentary, 2010.

220 It is useful to note in this context UNICEF's caution that "[h]uman behaviour is complicated. To effectively address behavioural challenges, you need to combine tools and insights from an array of disciplines." UNICEF, Why people do what they do: Understanding human behaviours and social phenomena, available at https://www.sbcguidance.org/sbc-pdf/14

221 OHCHR, Online scam operations and trafficking into forced criminality in South-East Asia: recommendations for a human rights response, August 2023.

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