Anti-social:
Modern slavery on social media

While social media has enabled unprecedented levels of global connectivity and delivered many socio-economic benefits,[1] greater connectivity has also brought new risks, with consequences that transcend the digital world. There is mounting evidence social media is used to facilitate modern slavery,[2] with perpetrators able to simultaneously target multiple people in different geographic locations, access their personal information, and exploit vulnerabilities while shielded by online anonymity.[3]

At the same time, rapid technological advancements have outpaced the development of regulatory frameworks, resulting in a lack of effective governance and accountability that enables modern slavery risks to flourish online.

The facilitation of forced commercial sexual exploitation (FCSE) of adults and children using social media is well documented.[4] Social media users may be recruited through deceptive job advertisements or targeted outreach using chat features, typically under the guise of building a relationship.[5] In June 2021, for example, 11 people were arrested for trafficking women and girls from Bangladesh to India for sexual exploitation after luring them via TikTok with the promise of work.[6] Following recruitment, social media may be used to track victims' locations, control their movements, and to record, advertise, and distribute FCSE material.[7] In 2023, shareholders launched litigation against Meta, arguing that the company's leadership and board failed to protect shareholder interests by purportedly turning "a blind eye" to widespread evidence of sex trafficking and child sexual exploitation on Facebook and Instagram.[8] Some measures intended to curb FCSE online have also exacerbated risks. For example, legislation introduced in the United States in 2017 to combat sex trafficking online reportedly increased the vulnerability of sex workers.[9] In effect, the law placed greater pressure on platforms to censor users, thereby removing safer spaces for sex workers to communicate and reduce their risk of harm, while increasing their risk of violence and poverty.[10]

Less is known about how social media impacts forced labour;[11] however, increasing use of social media to search for employment and the growing perception of it as a reliable source of information has created new opportunities for exploitation.[12] Fraudulent recruiters and traffickers may target potential victims via social media business pages,[13] recruitment advertisements,[14] and direct outreach on social media platforms.[15] Key word searches of some popular video-sharing platforms reveal the presence of unverified accounts posing as government-approved recruitment agencies which poses significant risks. Traffickers may also use social media to lure victims onto end-to-end encrypted platforms, such as WhatsApp,[16] where oversight by law enforcement for prevention and evidence collection is both legally and technically difficult.[17]

Harrowing accounts of trafficking for labour exploitation and domestic servitude via social media have emerged in recent years. In 2021, leaked Facebook documents revealed that Instagram and Facebook were used to recruit migrant workers from low-income countries via deceptive job advertisements and traffic them to the Gulf Cooperation Council countries for domestic servitude and forced sex work.[18] This followed a 2019 investigation which found that migrant domestic workers employed under the *kafala* system in Kuwait and Saudi Arabia were bought and sold via Instagram and other applications listed by Google Play and the Apple App Store.[19] Instagram's algorithm reportedly promoted hashtags used to advertise domestic workers on the platform.[20]

Building and abusing trust online: Experiences of a domestic worker

Cherry*, a 25-year-old from the Philippines, migrated to Kuwait in 2013 to earn a better income as a domestic worker.

"I accepted the job opportunity to help my family be able to stand poverty."

Cherry's first employer treated her well; however, they paid her less than the salary of KWD 120 (approximately US$390) she was promised, so they agreed to release her at the end of her contract. Meanwhile, Cherry used social media, especially Facebook, to connect with family and friends back home.

"My employer didn't mind it as long as I finished my daily tasks. It is where I met Joan, a domestic worker who lived in Salwa, Kuwait. We spoke a lot, shared videos, thoughts, and family life. We became very close."

With her contract coming to an end, Cherry told Joan she was looking for a new employer. They continued to talk, send greetings, and occasionally make video calls, and their friendship grew deeper. Then suddenly, Joan stopped sending messages. When she eventually came back online, she refused to accept video calls, claiming her employer forbid them.

One day, Cherry received a message from Joan saying that she had found an employer willing to pay Cherry KWD 250 (approximately US$815) if she went immediately. Cherry sought permission from her employer but was told she needed to wait three more months before she could transfer to a new job. So, she ran away, believing this was her only chance to change her fate.

"I went to the *jamiya*, the location we agreed to meet. I was excited to meet Joan for the first time."

Yet, when Cherry called Joan, she said she could not come. Instead, a man in a white car picked Cherry up and brought her to an old building, and told her Joan was inside waiting for her.

"The place was dark and scary. The man locked the door behind me. Grabbed me and pushed me in one of the rooms. I was abducted and forced to have sex with men…I felt like I am no longer human."

The perpetrators had taken the Facebook accounts of Joan and the other women trapped in the building and forced them to call their friends.

"They took my Facebook account and stole my identity just like they did to Joan. They sent KWD 120 monthly to my family so they would not report that I am missing to the OWWA [Overseas Workers Welfare Administration]. They let me talk to my family sometimes, but for a very short time with a knife pointing at me not to say anything suspicious. I was scared and helpless."

One day, a tip off led to a rescue operation. Cherry was taken to the police station and then a shelter where she received assistance and a medical check-up.

"I got deported for running away from my employer. I was thankful being deported and seeing my family."

The men who operated the scheme were captured and imprisoned by the Kuwait authorities.

*Not her real name

While it is clear that social media exacerbates modern slavery risks, it can also provide an avenue for vulnerable users and survivors to share their experiences and access support.[21] In 2021, for example, a Kenyan woman who was exploited while working as a cleaner in Saudi Arabia reported receiving assistance from an international organisation after posting about her situation on Facebook.[22] She was also recruited via Facebook, and claimed that the platform saw her into and out of the situation.[23] Migrant domestic workers experiencing abuse and mistreatment in the Gulf have also used Facebook and TikTok to share their experiences, ask for information, and raise awareness.[24] While this has reportedly helped domestic workers connect with other workers on the platforms, without the necessary safeguards in place, domestic workers can be exposed to further harms such as re-trafficking by exploitative recruiters who are also active on the platforms, employer retaliation, and even deportation.[25]

Modern slavery risks permeate the entire social media value chain — from sourcing raw materials, such as cobalt,[26] to the exploitation of workers in data labelling[27] and overseas data centres,[28] and into the digital platforms themselves.

The international community has recognised the need to safeguard human rights in the digital era.[29] In 2011, the United Nations Guiding Principles on Business and Human Rights (UNGPs) established the "corporate responsibility to respect," which requires businesses, to (a) avoid causing or contributing to adverse human rights impacts through their own activities and to address such impacts when they occur, and (b) seek to prevent or mitigate adverse human rights impacts that are directly linked to their operations, products, or services by their business relationships, even if they themselves have not contributed to those impacts.[30] As a result, social media companies have a duty to respond to any harm they cause or contributed to, including

harm caused by a third party using their platform.[31] Despite this, little is being done to protect social media users from modern slavery risks. Under current Modern Slavery Acts (MSAs) in the UK and Australia, certain companies are required to report on modern slavery risks in their operations and supply chains,[32] however there is no requirement for social media companies to report on how they are addressing modern slavery on their digital platforms.[33] Further, several companies with significant reach in the UK and Australia, but with no operations in either country, are not required to report. Gaps in the application of MSAs allow social media companies to evade responsibility for potential violations linked to their platforms.

In 2023, Walk Free assessed statements[34] published under UK and Australian MSAs by 10 companies. These companies cover 10 social media platforms and two e-stores distributing social media applications.[35] Our assessment found that social media companies are not doing enough to report on modern slavery within their direct operations or supply chains.[36] In their most recent statements (current as of 28 February 2023), no company complied with all minimum requirements under the Australian[37] or UK MSAs.[38] Supply chains are opaque: while all companies had some form of modern slavery policy, only four had a policy that extended beyond the first tier of their supply chain. Although five companies reported conducting risk assessments and risk management activities, with these same companies also identifying modern slavery risks, only two disclosed potential incidents of modern slavery. This suggests these companies should be doing more to actively identify risks and remediate incidents of forced labour where they occur.

Beyond requirements in the MSAs, we also reviewed the statements to understand how well companies are engaging with modern slavery risks on their social media platforms. While companies are not presently required to report on these aspects under the MSAs, we wanted to understand if companies were going beyond compliance to effectively engage with known risks.

Half of the statements assessed made specific disclosures relating to modern slavery risks on their platforms. Four companies reported having modern slavery policies relating to social media, including policies against apps, content, and behaviours that facilitate human trafficking, child exploitation, and human exploitation. Further, only three companies reported activities to detect modern slavery on social media, including through use of image matching technology and mechanisms allowing users to report slavery-related content.

One company reported making information on support services available for all users, however no other prevention measures were reported. Some of the companies assessed reported having policies against sexually explicit advertisements, however none reported assessing advertisements for indicators of modern slavery, despite known risks and the significant control companies have over paid promotions and advertisements. None reported including modern slavery considerations into product design and development, where such efforts are crucial to addressing risks before impacting vulnerable end users.

Concerningly, only four companies reported remediation strategies for incidents identified on social media: measures included cooperation with law enforcement and removal of content, user accounts, or apps. Without further action to investigate and remove the source of risk, content removal merely displaces risk. Multi-stakeholder cooperation is vital to lifting industry standards, fostering greater transparency, and ensuring that modern slavery risks are effectively removed.[39] Three companies assessed reported participation in industry collaborations seeking to combat modern slavery on social media. Tech Against Trafficking[40] and the Tech Coalition,[41] for example, represent industry initiatives to combat human trafficking and child sexual exploitation online. More targeted efforts must be made to combat all forms of modern slavery that manifest on social media.

An assessment of statements released by social media companies shows that they must take more action to understand how modern slavery manifests online and to address the modern slavery risks that occur. Social media companies, with more than 4.5 billion users now active across the globe, have enormous influence worldwide.[42] There is an urgent need for them to stop perpetrators from operating with impunity and to prevent modern slavery from flourishing online.

Recommendations for governments

1 Introduce mandatory human rights due diligence laws, similar to the French Duty of Vigilance law,[43] which require businesses and other organisations to conduct due diligence to proactively identify and remediate forced labour risks and which cover the entire value chain including end-users.

2 Strengthen existing MSAs to require social media companies to report on how they are addressing modern slavery on their platforms (including companies with a significant user base in Australia and/or the UK, regardless of annual revenue) and to issue detailed guidance to support implementation.[44]

3 Cooperate with other governments to strengthen governance and accountability frameworks for social media companies. Such frameworks must consider the constantly evolving nature of digital technologies and ensure sufficient geographic coverage.

4 Consider potential unintended consequences, such as the removal of safeguards for sex workers, in all legislative and policy responses to regulate online digital spaces, and include those with lived experience in any consultations regarding addressing human rights and modern slavery risks on social media.[45]

5 Ensure all legislative and policy responses are informed by research and developed in consultation with survivors, social media experts, and anti-slavery stakeholders.

Recommendations for social media

1 Develop and publish clear and specific policies to detect, prevent, and remedy modern slavery risks across the entire value chain, including their social media platforms.

2 Conduct due diligence, including implementing and reporting on measures to systematically detect modern slavery on their platforms. These efforts should include dedicated monitoring for indicators of modern slavery, as well as mechanisms for users to report modern slavery and for local support providers to reach at-risk users safely and securely.[46]

3 Provide effective remediation for incidents that occur on their platforms through removing violating content and accounts, transparent reporting on content moderation, cooperating with law enforcement (while safeguarding privacy and human rights), and referring affected persons to support services.

4 Actively prevent modern slavery risks on social media through verifying recruitment advertisements and social media business pages, targeting awareness-raising on risks, promoting anti-slavery hotlines,[47] providing identity verification options for all users, and requiring compulsory modern slavery training for product and third-party software developers.

5 Engage in industry collaborations to lift industry standards for preventing, identifying, and mitigating modern slavery risks. These collaborations must involve consultation with survivors and anti-slavery experts.