While social media has enabled unprecedented levels of global connectivity and delivered many socio-economic benefits, 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, with perpetrators able to simultaneously target multiple people in different geographic locations, access their personal information, and exploit vulnerabilities while shielded by online anonymity.

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. Social media users may be recruited through deceptive job advertisements or targeted outreach using chat features, typically under the guise of building a relationship. 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.

Following recruitment, social media may be used to track victims’ locations, control their movements, and to record, advertise, and distribute FCSE material. In 2021, shareholders launched litigation against Meta, arguing that the company’s users, thereby removing safer spaces for sex workers.

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. 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. She was also recruited via Facebook, and claimed that the platform saw her into and out of the situation.

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

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harm caused by a third party using their platform.42 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 statements34 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 Australian37 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 related to social media, including policies against ads, 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 Trafficking40 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.**

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.**

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.**

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,48 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.**