

Artificial intelligence and human trafficking: Threats, responses, and ethical considerations



Policy Brief



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Policy Brief

Council of Europe,
Group of Experts against Trafficking in Human Beings (GRETA)

Council of the Baltic Sea States,
Task Force against Trafficking in Human Beings (CBSS – TFTHB)

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SUMMARY

- Artificial intelligence (AI) is reshaping both criminal activities and anti-trafficking work.
- AI helps traffickers e.g. to automate conversations and translate languages for victim recruitment, create realistic social media personas and advertisements, as well as produce fake travel documents.
- AI tools and technologies such as chatbots, AI-powered data analysis, and facial recognition can assist anti-trafficking work. They facilitate efforts to prevent human trafficking, investigate cases, support victims, and build partnerships.
- Key ethical challenges in using AI for anti-trafficking include biases in AI systems, data privacy risks, the spillover of benevolent technologies to criminal users, and overreliance on conclusions made by AI.
- Addressing these challenges requires adopting a human rights-based approach, following the ethical principles of accountability, transparency and explainability, fairness and non-discrimination, human control of technology, privacy, safety and security, and professional responsibility.
- Equitable access to technology and digital literacy skills contribute to building AI-resilient societies.

1. INTRODUCTION

The impact of technology on human trafficking is a closely watched dynamic in the anti-trafficking community. The growing prevalence of online recruitment and exploitation, as well as the use of technology to enhance investigations and victim support, have received significant attention.ⁱⁱ Artificial intelligence (AI) is amplifying and accelerating these trends.^{iii iv} AI refers to a computer system that performs tasks normally requiring human intelligence.^v This encompasses a broad range of tools, technologies, and terminology. The following terms are often used when discussing AI's impact on human trafficking and anti-trafficking work:

- **Machine learning:** A field of AI where computers learn and adapt without explicit programming from humans. Most current AI advances rely on machine learning.^{vi}
- **Natural language processing (NLP):** The programming of computers to understand and generate human text. Used, for instance, in speech recognition, translation, and chatbots.^{vii}
- **Generative AI (GenAI):** A type of machine learning model that can generate new content, including text, audio, video, or images (such as ChatGPT).^{viii}
- **Large language model (LLM):** A type of GenAI that employs NLP to recognise and generate human text (such as ChatGPT when used to create text).^{ix}

Like other technologies, AI may be used to both benefit and undermine human rights, institutional resilience, and the rule of law. While AI may strengthen the capacity of authorities to detect trafficking patterns, support investigations, and improve cross-border cooperation, it may also amplify existing vulnerabilities, inequalities and power asymmetries that traffickers exploit.

This policy brief aims to provide an overview of AI in the context of human trafficking. To do so, it will first outline how criminals use AI and then explain how anti-trafficking professionals can employ AI to advance their work. The policy brief will continue by highlighting ethical challenges and finally reflect on the importance of digital literacy and equitable access to technology. The information presented in the following sections is based on insights from the 2025 Council of Europe conference *Empowering Change: Technology and Artificial Intelligence in the Fight Against Human Trafficking*, organised under the Maltese Presidency of the Committee of Ministers of the Council of Europe on 11 June 2025,^x as well as secondary literature from international organisations, governments, and academic sources.

2. CRIMINAL USE OF AI

Criminals, including human traffickers, use AI to enhance all aspects of their activities. GenAI is particularly attractive to criminals thanks to its versatility and ease of use. For example, GenAI makes the recruitment of victims easier and more effective. Traffickers can automate conversations and translate them to different languages to reach more victims faster, as well as expand recruitment to new communities. AI tools may also enable traffickers to analyse social media activity and online behaviour in order to identify, target, and manipulate persons in vulnerable situations with greater speed, scale, and precision. In addition, GenAI enables criminals to create more realistic social media personas, websites, and recruitment advertisements.^{xi}

Deepfake technology is another application of GenAI with potential for malicious use. For instance, traffickers can use deepfake tools to generate sexual content based on their victims. They can then blackmail victims by threatening to share the content if the victims do not comply. Deepfakes can also be used to impersonate someone, such as a relative of the victim, to further assert control. Moreover, criminals can generate fake documents to facilitate the recruitment, transfer or control of victims.^{xii}

Many of these crime-enhancing features can be achieved with free-to-use AI software. However, criminals also adapt them into custom solutions. For example, FraudGPT is a chatbot that resembles ChatGPT but generates targeted phishing emails.^{xiii} The crime-as-a-service model allows traffickers to utilise advanced AI solutions even without computer science expertise. They can simply purchase relevant products or services from other AI-savvy criminals.^{xiv}

As AI continues to rapidly evolve, identifying fraudulent AI content is likely to become increasingly difficult. In addition, the sheer volume of content that AI creates causes new challenges for anti-trafficking work.^{xv} To effectively respond to these challenges, anti-trafficking authorities and organisations may benefit from exploring how they can leverage AI to support their work.

3. AI FOR COMBATTING HUMAN TRAFFICKING

AI can be a powerful tool to protect victims and hold traffickers accountable. AI solutions can assist stakeholders across the “Four P’s” of anti-trafficking action: prevention, prosecution, protection, and partnerships.^{xvi}

In the field of prevention, anti-trafficking actors can use GenAI to facilitate the fast and efficient translation of awareness-raising campaigns, so that messages reach larger audiences.^{xvii} Machine-learning-based tools may also improve online content moderation. They can help to detect, for instance, child sexual abuse material.^{xviii} In addition, AI offers applications for deterring potential perpetrators. For example, the NGO Terre des Hommes has developed a chatbot to identify possible child sexual offenders. The chatbot, which impersonates a 10-year-old child, is deployed in chat rooms used for webcam sex tourism. When it identifies a potential offender, it sends them messages to warn them about the legal consequences of proceeding with their actions.^{xix} This initiative highlights how the creative use of new technologies can enable anti-trafficking organisations to extend prevention efforts to individuals they may not otherwise reach.

When it comes to prosecution, AI supports information gathering and analysis at different stages of investigations. Machine learning can strengthen financial investigations by finding patterns in financial data. Machine learning tools can then flag suspicious behaviours that could indicate money laundering or control over a victim's bank account.^{xx} Additionally, this technology can facilitate the identification of exploitation indicators from large data sets. For example, the NGO Global Fishing Watch has created an AI model to analyse satellite data and identify vessels with characteristics suggesting forced labour aboard.^{xxi xxii} Another example is the Traffic Jam software, built by the company Marinus Analytics. It uses computer vision techniques, such as facial recognition, to comb through large amounts of information and identify possible victims and perpetrators.^{xxiii xxiv} With these types of investigative tools, authorities are able to process large amounts of data quickly and effectively and respond to the AI-boosted efficiencies of criminals.

AI also has positive potential in protecting and supporting victims of human trafficking. Chatbots can provide advice to victims, facilitating better access to support when resources for victim assistance are limited. In addition, NLP can analyse the experiences of victims to enhance the provision of assistance. An example is the RESTART project, which was implemented as a collaboration between academic, NGO, and private sector stakeholders. This project used NLP to examine anonymised case notes and journal entries of victims, aiming to identify patterns of assistance need.^{xxv} It concluded that AI may provide significant benefits for improving victim support ecosystems by facilitating the analysis of victim needs in real-time and at scale.^{xxvi}

Finally, AI-driven approaches offer opportunities to enhance the ability of anti-trafficking stakeholders to work together across institutions and sectors. For instance, the Traffik Analysis Hub is a data platform co-designed by IBM and the NGO STOP THE TRAFK. The platform employs AI to analyse data – including financial transactions, travel records, and case reports – submitted by banks, NGOs, and law enforcement. The goal is to pool data sets that would normally operate in isolation. Consequently, law enforcement may be able to better focus resources on suspicious locations and likely patterns of exploitation.^{xxvii} While AI can significantly strengthen anti-trafficking responses, it should complement rather than replace human expertise, professional judgement, and victim-centred approaches. In particular, high-risk contexts involving vulnerable persons, children, migration management, or automated risk assessments require careful human oversight to avoid misidentification, discriminatory outcomes, or unintended harm.

4. PRINCIPLES OF ETHICAL AI USE

The benefits of AI in anti-trafficking action are accompanied by risks of ethical missteps. Given how quickly AI is evolving and how extensive its societal impacts can be, it is important to ground its use in a strong ethical framework. This helps to ensure that AI contributes to anti-trafficking action in comprehensive, inclusive, and effective ways. At its core, anti-trafficking AI should have a human rights-based approach. In other words, human rights considerations should be integrated into all stages of an AI tool's life cycle. Researchers and AI experts have devised different sets of ethical principles to guide responsible AI use.^{xxviii} Broadly speaking, they converge around the following interlinked and mutually reinforcing themes: *accountability, transparency and explainability, fairness and non-discrimination, human control of technology, privacy, safety and security, and professional responsibility.*^{xxix}

4.1 Accountability

The developers of AI systems should be held accountable for the impacts of their tools. Regulation has a key role to play in promoting accountability by setting standards for the responsible use of AI in anti-trafficking work and minimising the spillover of new AI solutions to criminal actors.

At the international level, relevant regulatory frameworks on AI ethics include the UN Global Digital Compact, the UNESCO Recommendation on the Ethics of Artificial Intelligence, the Council of Europe Framework Convention on Artificial Intelligence and Human Rights, Democracy and the Rule of Law, and the EU AI Act.^{xxx xxxi xxxii xxxiii} The latter two are legally binding instruments, although the Council of Europe Framework Convention is, at the time of writing, still awaiting ratification. All these frameworks aim to promote AI that advances safe and resilient societies in which everyone's human rights are respected. For example, the Council of Europe Framework Convention's chapter on General obligations list principles of ethical AI use that parties commit to following. Meanwhile, the EU AI Act provides safeguards for using AI in sensitive areas. They include applications that law enforcement or migration agencies use to strengthen investigations or conduct risk scoring.^{xxxiv}

These frameworks are not without flaws. The EU AI Act, for instance, has been criticised for assuring robust safeguards only to a limited group of "high-risk" tools, while leaving many potentially dangerous tools outside of its scope.^{xxxv} Moreover, given the rapid advances in AI, regulation is likely to lag behind technological advancement.^{xxxvi} Nevertheless, these instruments establish a foundation for human rights-based AI governance, which can signpost pathways for securing accountable AI use.

4.2 Transparency and explainability

AI products should allow users to understand how they reach their conclusions.^{xxxvii} Currently, tracing the reasoning for AI outputs is frequently difficult for outsiders. It can even be challenging for developers themselves. This is problematic because even though the results that AI produces may appear to be neutral, they often reflect the assumptions and values of the system's designers. For example, if an AI-based software is used to predict high-risk individuals or areas, it incorporates assumptions about what its creators view as predictors of human trafficking risk.^{xxxviii} Without adequate attention to transparency, there is a danger of making high-stakes decisions based on incomplete or misguided reasoning.

Full transparency is not always feasible, as transparency may compete with other needs, like the protection of investigative procedures.^{xxxix} Even so, ensuring that AI used in anti-trafficking work produces results that are, as far as possible, traceable and easy to understand helps strengthen accountability and makes it easier to identify and correct problematic conclusions.^{xl}

4.3 Fairness and non-discrimination

Biases in AI systems can lead to inadvertently discriminatory outcomes. Such biases are often related to inadequate training data.^{xli} If training data sets are unrepresentative in relation to gender, ethnicity, disability, or other characteristics, these biases will be reflected in the AI outputs, too.^{xlii} For instance, solutions relying on facial recognition can misclassify individuals as victims or perpetrators or fail to recognise actual victims or

perpetrators.^{xliii} Particular caution is required where AI tools are used in contexts involving children, migrants, undocumented persons, or other groups in vulnerable situations.

A significant contributor to unrepresentative data sets is inadequate data sharing between technology companies, law enforcement authorities, victim support organisations, and other anti-trafficking stakeholders. Each holds only a part of the information needed to train comprehensive AI platforms. Consequently, reluctance to share data – often driven by a lack of trust – can exacerbate bias.^{xliv xlv} Improving fairness in AI systems is thus linked to promoting responsible data sharing. One initiative addressing this challenge is the Tech Against Trafficking platform. It facilitates collaboration between technology companies, as well as with NGOs and international organisations, in producing solutions to combat human trafficking.^{xlvi xlvii} The more established these types of collaboration structures become, the more likely AI-driven solutions are to appropriately reflect the diversity in victims, perpetrators, and exploitative situations.

4.4 Human control of technology

Responsible AI use is linked with maintaining human oversight and employing AI as a tool rather than as a complete solution. This is especially important in anti-trafficking contexts, where victim identification, risk assessment and protection decisions may have profound consequences for the safety, rights, and wellbeing of vulnerable persons. Avoiding situations in which AI systems independently make high-stakes decisions is crucial, as is preserving the human empathy that is central to assisting victims. AI applications should include human contributions throughout development and implementation.^{xlviii xlix} This means, for instance, that humans provide regular input during the training and usage of anti-trafficking AI, so that the software learns and improves based on the insights of experts on the topic.ⁱ

In addition, users of anti-trafficking AI should receive training on employing AI appropriately to support, but not substitute, decision-making.ⁱⁱ For example, financial investigators using AI to find suspicious transactions should manually verify alerts before acting upon them. Similarly, an AI chatbot may provide legal advice or emotional support for victims, but trained professionals should be available to provide personalised assistance.ⁱⁱⁱ Such measures enable maximising the positive impacts of AI while retaining decision-making in human hands. Ultimately, building trust with victims, conducting trauma-informed interviews, and assessing individual vulnerabilities remain fundamentally human responsibilities.

4.5 Privacy, safety and security

AI systems used in anti-trafficking work should not cause harm to those they are meant to protect. Harmful impacts could include stigma from being misidentified by AI, re-traumatisation from over-reliance on AI in victim support, or exposure of sensitive personal data.^{liii}

Promoting safe and secure AI requires embedding risk assessment and mitigation processes into the life cycle of AI systems. Tools should be tested in different real-life conditions, with operators equipped to monitor them to identify mistakes or new risks. Especially when working with issues that involve vulnerable people and sensitive personal

information, continuous safety processes are important safeguards for making sure that AI solutions serve their intended purpose.^{liv lv}

Another concern is that AI may collect large amounts of personal data on potential victims and perpetrators. For example, using AI for large-scale surveillance to detect potential victims and perpetrators may risk breaching individuals' right to privacy. In addition, if AI tools are used to gather information from victims, inadequate data protection can put them in danger. This can happen, for example, if a perpetrator finds a way to access the data.^{lvi} Thus, AI systems and the databases associated with them should be as secure and resistant to compromise as possible.

4.6 Professional responsibility

Developers of AI-powered anti-trafficking products are responsible for upholding ethical standards and minimising risks of misuse. Just as with mitigating AI biases, multistakeholder cooperation between technology and anti-trafficking communities is a critical component of this task. AI technologists may not have an in-depth understanding of the social impacts of their work. Conversely, anti-trafficking actors may not be fully versed in the technical potential of AI.^{lvii} With a collaborative approach, AI solutions are better primed to consider the needs of those they aim to benefit.

In particular, victims of human trafficking and vulnerable communities should have a voice throughout the whole life cycle of AI tools.^{lviii} For example, research projects can involve consultation committees with lived experience experts to guide the direction of new AI solutions from ideation to periodic review of the finished solutions.^{lix lx} Professional responsibility over anti-trafficking AI, therefore, requires ensuring that affected communities have a meaningful role in promoting AI that is both effective and just.

5. DIGITAL DIVIDES AND EQUITABLE AI

Designing, using, and governing AI with a human rights-based approach lays a foundation for an anti-trafficking ecosystem that harnesses the potential of AI responsibly.^{lxi lxii} However, the benefits of AI are not equally distributed. Digital divides within and between countries influence the extent to which anti-trafficking stakeholders can employ AI solutions and defend themselves against criminal AI use. For example, authorities in low-income countries, or victim support organisations with few resources, may find it difficult to adopt the latest technologies. Given the transnational and cross-sectoral nature of human trafficking, such disparities impact the anti-trafficking community as a whole.^{lxiii} Thus, efforts to reduce digital disparities, paired with creativity in maximising the potential of free-to-use AI-solutions, help build resilience throughout the anti-trafficking community.

Digital divides are a challenge also in society at large. The responsibility for AI misuse lies with those making and operating the applications – not with potential victims. Nevertheless, inadequate digital literacy makes individuals more susceptible to manipulation by AI-equipped traffickers.^{lxiv} Improving digital literacy complements targeted anti-trafficking actions by addressing broader societal resilience. For example, UNICEF's *Tinkering with Tech* project promotes digital skills and AI literacy through experimental learning in schools across the world.^{lxv} Such initiatives support the ability of children to grow up appreciating both the benefits and dangers of AI. Educational efforts can also extend to adults. They can be

especially helpful for communities or individuals with heightened vulnerabilities to AI-powered exploitation, such as older or socially isolated people.^{lxvi}

6. CONCLUSION

AI is influencing the anti-trafficking world from several directions. It provides criminals ample new opportunities for scaling recruitment, tightening control, and evading detection. Yet the same technologies open doors to new ways of reaching vulnerable people, identifying patterns of exploitation, protecting victims, and forging alliances.

As this policy brief has illustrated, the responsible use of AI requires embracing the promises of new technologies while embedding them into a human-rights-based framework. Ethical principles, including accountability, professional responsibility, transparency, and human oversight, provide guardrails for developing AI tools that reduce harm rather than inadvertently amplifying it. At the same time, anti-trafficking stakeholders will have to consider technological developments in a broader societal context. Addressing digital divides and strengthening digital literacy contribute to building societies that are both resilient to AI-enabled exploitation and innovative in responding to it.

The advancement of AI is unlikely to slow down in the coming years. Neither is the debate about its challenges and opportunities in anti-trafficking work. In this context, prioritising inclusive collaboration, responsive governance, and equitable access to technology supports the design of AI that contributes meaningfully to global efforts to combat human trafficking.

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- ^{lxvi} Makridis, ‘Countering human trafficking risks of generative AI’ (2025)

The Council of Europe's Group of Experts on Action against Trafficking in Human Beings (GRETA) and the Council of the Baltic Sea States' Task Force against Trafficking in Human Beings (CBSS-TFTHB) have jointly published the policy brief "Artificial Intelligence and Human Trafficking: Threats, Responses, and Ethical Considerations".

The policy brief outlines how criminals use AI to enhance all aspects of their activities, from recruitment of victims, the creation of fake profiles, the production of fraudulent documents and identify theft. At the same time, it highlights ways in which AI is employed by anti-trafficking professionals to advance their work. This includes facial recognition to identify victims and perpetrators, the provision of assistance and advice to victims, and gathering and analysis of information at different stages of investigations.

The benefits of AI are accompanied by ethical challenges, such as discriminatory bias, breaches of privacy, and over-reliance on conclusions made by AI. The policy brief stresses that the use of AI should be grounded in a human rights-based approach, centred on six principles: accountability, transparency and explainability, fairness and non-discrimination, human oversight, protection of privacy and security, and professional responsibility.

trafficking@coe.int
www.coe.int/trafficking

www.coe.int

The Council of Europe is the continent's leading human rights organisation. It comprises 46 member states, including all members of the European Union. All Council of Europe member states have signed up to the European Convention on Human Rights, a treaty designed to protect human rights, democracy and the rule of law. The European Court of Human Rights oversees the implementation of the Convention in the member states.

