

Lessons from the Freedom Fund's Myanmar hotspot program

### BACKGROUND

Although Myanmar has long been a source country for human trafficking, the country had made progress in the prosecution of trafficking crimes, victim identification, and rehabilitation. However, protection and support for survivors of trafficking has been weakened by the covid-19 pandemic and 2021 military coup, which installed the State Administration Council (SAC) and introduced a year-long state of emergency that has since been extended repeatedly. Since assuming control, the SAC has violently suppressed peaceful pro-democracy protests, conducted indiscriminate airstrikes and



widespread destruction of civilian infrastructure, and attempted to quash growing resistance from ethnic armed groups and anti-military forces.<sup>2</sup> Other parties to conflicts have also committed human rights abuses on the ground.<sup>3</sup> As a result, anti-trafficking efforts have steadily declined, with the SAC prioritising the consolidation of power over the restoration of essential public services that are needed for a holistic anti-trafficking response, such as healthcare, protection, education and justice.<sup>4</sup>

Over 3.3 million people were displaced as of August 2025 and there are overwhelming humanitarian needs across the country.<sup>5</sup> This has exacerbated the vulnerability of affected populations to trafficking and exploitation, especially in conflict-affected areas, increasing their risk of forced labour and forced marriage. The SAC's enforcement of a mandatory conscription law in 2024 has pushed many youth, particularly men and women of conscription age, toward unsafe migration or armed groups, such as the People's Defence Forces or ethnic armed organisations.<sup>6</sup> Weakened law enforcement in contested territories within the country and reduced funding for frontline anti-trafficking services have created conditions particularly ripe for trafficking. This has contributed to emerging forms of trafficking, such as forced scamming, online sexual exploitation, online casinos and forced surrogacy.<sup>7</sup> A 2024 study recorded a surge in trafficking for marriage, with survivors arriving from new areas, including Yangon, after being recruited under the guise of factory work in China through social media platforms such as Facebook and Tik Tok.<sup>8</sup>

Given the vastly reduced presence of larger, international actors since the military coup, local civil society organisations (CSOs) have been trying to fill critical service gaps. However, they face notable challenges. The Organisational Registration Law (ORL) enacted by the SAC in 2022 requires all CSOs – regardless of size – to register with local authorities, disclose funding sources and provide detailed operational data. Non-compliance risks fines or asset seizure. State control and surveillance (including digital surveillance and oppression) have increased significantly, with CSO staff and partners facing intimidation, arbitrary arrest and even violence. Formal coordination and referral pathways with state actors, such as the Anti-Trafficking Task Force and the Department of Rehabilitation, have largely collapsed. Tighter banking restrictions have further obstructed CSOs' access to international funding, limited their collaboration with international actors and created cash flow problems. Global funding cuts, such as the USAID funding cuts in early 2025 have exacerbated these challenges. Severe mobility restrictions (due to curfews, travel restrictions, and military checkpoints), fuel shortages and internet shutdowns have also impeded access to communities and raised programming costs. Together, these pressures have contributed to staff burnout and trauma, made worse by staffing disruptions linked to conflict and staff members' own displacement.

Despite these challenges, CSOs' continue to leverage their strong community ties and nuanced understandings of local security dynamics to reach at-risk populations. They play a critical frontline role in aid delivery, documenting abuses and advocating for human rights in one of the world's most repressive contexts. This report explores how CSOs have overcome seemingly insurmountable barriers to continue delivering essential anti-trafficking services to communities across conflict-affected areas of Myanmar.

## THE FREEDOM FUND IN MYANMAR

The Freedom Fund is a collaborative fund that invests in frontline organisations and movements to drive a measurable reduction of modern slavery in high-prevalence countries and industries. We fund, support and convene community and survivor-led organisations working to end modern slavery and human trafficking.

We established our Myanmar hotspot in 2020, partnering with local CSOs in Kachin State and Northern Shan to support displacement-affected communities and provide direct assistance to women and girls affected by, or at risk of, trafficking for forced marriage and childbearing in China.

In 2022, we broadened our strategic focus to respond to the deepening humanitarian crisis, the growing gaps in anti-trafficking efforts, and the need to balance long-term impact with urgent, lifesaving assistance. Our updated strategic interventions included addressing emerging forms of exploitation and meeting ongoing humanitarian needs, particularly among women and girls in displacement settings in Kachin and Northern Shan.

From 2023, we expanded our program to include the Yangon region, which has one of the highest number of registered trafficking cases and adopted a more flexible strategy, combining emergency assistance with investment in the capacity of frontline organisations, communities and survivors to reduce exploitation risks.

## **ABOUT THIS REPORT**

This report reflects findings from our Myanmar hotspot program and aims to:

- Document key lessons from implementing our hotspot program (from January 2020 to April 2025)
   amid conflict, instability, and significant displacement
- Assess the effectiveness of strategies, partnerships and support for survivors in crisis settings, with a focus on how communities can protect people from trafficking, even when the direct presence of CSO staff is disrupted
- Provide practical recommendations for humanitarian actors and funders and implementers of anti-trafficking programming in fragile settings.

This report is based on a mixed methods learning exercise. Focus group discussions (FGDs)<sup>14</sup> were conducted with 30 project staff and senior management of local women-led organisations working in urban areas in the Yangon Region and Kachin State, and rural settings and displacement camps settings in Northern Shan and Kachin States. Participating organisations partnered with the Freedom Fund either from inception in 2020 or from 2023. We do not name the partners for safety reasons and to protect their ongoing operations. The FGD findings were complemented by a desk review of program monitoring reports produced by our partners since the hotspot program's inception in January 2020 and a contextual analysis based on media reports and publicly available reports from United Nations agencies and other international organisations working to combat trafficking in persons (TiP) in Myanmar.

The following section presents an overview of anti-trafficking efforts in Myanmar, prior to and after the 2021 military coup, before presenting findings from our partners' efforts to implement anti-trafficking interventions from January 2020 to April 2025.



# OVERVIEW OF NATIONAL ANTI-TRAFFICKING EFFORTS IN MYANMAR PRE- AND POST-2021

### **Legal provisions**

Since 2005, Myanmar's Anti-Trafficking in Persons Law (ATiP Law) has provided a basic legal framework for addressing a comprehensive range of forms of TiP, criminalising acts that include sex trafficking, labour trafficking, the removal or sale of human organs, fraudulent adoption, and fraudulent marriage. <sup>15</sup> Prescribed penalties include a minimum of five years' imprisonment for trafficking of adult men, and up to life imprisonment for trafficking women and children. 16 Legal provisions for combatting TiP were further strengthened in June 2022 by an amendment to the ATIP law that criminalized additional forms of exploitation, including forced marriage, forced begging, technology-facilitated exploitation and surrogate pregnancy.<sup>17</sup> Critically, the amended AtiP removed the requirement for demonstration of force, fraud or coercion in child sex trafficking crimes, thus aligning Myanmar's definition of trafficking with international law. 18 It also strengthened localized responses by mandating the establishment of village- and ward-level community-based committees within each township. These were legally empowered to identify, report and investigate offences related to TiP, in coordination with the township-level Anti-Trafficking in Persons Prevention Committee and Myanmar police forces. They also act as designated witnesses in legal proceedings. Although the turbulent context has prevented this measure from being realised in practice, the legal provisions for community-based interventions are now in place.

## National coordination to suppress trafficking in persons

The Central Body for the Suppression of Trafficking in Persons (CBTiP) was established following enactment of the ATiP Law and is chaired by the Minister of Home Affairs. Its responsibilities include coordinating and communicating with international and regional organisations, foreign governments and local and international non-governmental organisations in preventing trafficking and protecting and assisting trafficking survivors. However, since the 2021 military coup, the CBTiP has become largely inactive under the SAC. This is evidenced by the SAC's failure to renew the national five-year national action plan to combat TiP that expired in 2021 and minimal efforts to suppress TiP through CBTiP-led interagency coordination.<sup>19</sup> Interagency coordination has been undermined by declining public trust in SAC-led institutions, particularly the police and judiciary, due to arbitrary arrests, torture, unfair trials of regime opponents, the introduction of the 2022 ORL, escalating violence and lack of progress to implement ASEAN's Five-Point Consensus to address Myanmar's political crisis.<sup>20</sup>

### National referral mechanism: Gaps, legitimacy and limited reach

Since the military coup, growing international concern over the SAC's political legitimacy and its ongoing violence against civilians has prompted numerous governments and international bodies to suspend or significantly reduce direct engagement with Myanmar.<sup>21</sup> One exception is Myanmar's long-standing bilateral cooperation with Thailand and China on TiP that has continued under the SAC, particularly in the areas of return and reintegration of survivors. Nevertheless, survivor assistance in Myanmar remains inadequate; state rehabilitation shelters are not fully operational and the SAC's coordination with civil society is limited, especially in areas where administrative control is contested.

# Myanmar police force Anti-Trafficking in Persons Division: Prosecutorial efforts

Despite improved legislative provisions for combatting trafficking, by 2022, the SAC could only attempt to enforce laws — including those related to trafficking — in approximately 50 percent of the country. In 2022, only 17 trafficking cases were investigated, rising to 27 in 2023. Courts convicted 111 traffickers in 2023, down from 170 in 2022. Delays and lack of transparency have hindered justice and access to remedies for survivors, allowing many perpetrators to evade accountability. Since 2021, allocation of judicial resources to politically-motivated prosecutions has significantly delayed human trafficking cases, hindering survivors' access to justice. For instance, an 11-year-old girl's rape case in Yangon was transferred to a military court, causing prolonged delays before a lawsuit could be filed. Investigation and prosecution of trafficking crimes have been impeded by corruption, inactive law enforcement, cases not being registered by police as 'trafficking' cases, traffickers' growing online presence and exploitation of victims in autonomous regions where law enforcement is particularly challenging. In autonomous regions where law enforcement is particularly challenging.



## **FINDINGS**

# Local civil society organisations' reflections on implementing anti-trafficking programming

Despite Myanmar's political crisis and armed conflict severely disrupting anti-trafficking efforts, CSOs have continued to provide vital grassroots services for survivors – including rescue support, shelter, food, legal aid, case management, psychosocial counselling, hotline services, livelihood support and reintegration assistance – adjusting their approaches as much as possible to ensure service continuity. The findings in this section highlights the adapted strategies used by our partners to support trafficking survivors and at-risk communities.

## Strengthening resilience, vigilance, and reducing high-risk decision-making among at-risk communities

Conflict, displacement, worsening socio-economic conditions, ORL restrictions, and the need to prioritize staff safety have significantly reduced CSOs' access to affected communities. These challenges prompted our partners to adjust their programming approaches to strengthen communities' resilience to trafficking threats, leading to greater investment in raising awareness, countering misinformation, supporting livelihoods, and increasing community vigilance and capacity for early interventions.

A key strategy that partners used to strengthen communities' resilience and support safer decision-making was the provision of education to communities on TiP risks, including unsafe migration. Partners explained how raising awareness can prevent trafficking by ensuring at-risk individuals have up-to-date information to make informed decisions about their lives and those of their family.

A family in our village struggling to make ends meet was about to send their 16-year-old daughter abroad after being told that the work would be easy and well-paid, without being given clear details about the job. The mother initially gave her permission, but after recalling the trafficking awareness training from community volunteers, she reconsidered and decided to stop her daughter from going. Upon further investigation, it was revealed that the job was actually in prostitution.

Female member of grassroot volunteer group formed by Partner 1, Kachin State

Awareness raising that integrates real-life stories and survivor experiences with locally relevant information proved particularly effective. For instance, when implementing "Tea Talks" – small, informal discussions in trusted community spaces that were introduced when curfews and insecurity hindered larger events in urban and peri-urban Yangon – one of our partners (Partner 3) found the engagement of survivor leaders to be critical as their testimonies fostered a powerful learning environment. Partner 3 reported that they assisted 105 survivors in 2024. Almost 90% of the trafficking incidents reported came from individuals who had joined their awareness-raising sessions and volunteer groups, demonstrating the effectiveness of community-level awareness building in this context. All three partners also observed that awareness raising had increased communities' understanding of survivors' experiences, with one volunteer noting, "there is now more empathy and kindness, and survivors are increasingly able to live without stigma" (Community volunteer, Partner 1).

#### **CASE STUDY**

## Preventing trafficking through awareness raising in IDP camps

In villages and newly established displacement camps in conflict-affected areas of Kachin State, one of our partners (Partner 2) conducted regular awareness sessions on trafficking risks, working closely with community leaders and mobilisers to reach those most at risk. In 2022, these efforts proved critical when an unknown group attempted to traffic 100 young women from the Maina camp in Waingmaw Township under the false promise of a UN-sponsored education program in Dubai. Informed by the awareness sessions, a trained community mobiliser raised concerns and notified the CSO and other local networks. It was confirmed that no such UN program existed. Thanks to the early intervention and heightened community vigilance fostered by our partner's awareness-raising activities, all 100 young women were protected from potential trafficking.



Partners also built community resilience and reduced communities' vulnerability to TiP through the provision of microenterprise initiatives and vocational training to survivors, youth and vulnerable families in displacement camps and urban settings. These interventions aimed to reduce economic desperation that increases the risk of exploitation and unsafe migration.

We piloted a livelihood support program for young women in 2023, focusing on sewing skills training. We've continued to stay in touch with 14 women from IDP camps who participated, and 11 of them have since started small sewing businesses from their homes in Myitkyina, Waingmaw, and Tanaing townships, earning between USD 30 to 92 per month. This reflects a 71% success rate in increased earned income. Survivors have told us that economic empowerment and livelihood training for women are key strategies to proactively reduce the risks of migration-related trafficking.

Program Manager, Partner 2, Kachin

In urban areas of Yangon, partners observed that livelihood initiatives such as microenterprise start-ups were often failing due to pre-existing debts, weak family support and limited follow-up. In conflict-affected Kachin and Northern Shan, traditional livelihoods activities such as livestock rearing or small businesses were frequently disrupted by conflict and displacement. Partners therefore consulted survivors about what might work, with survivors recommending portable and adaptable skills training that would enable them to earn a living regardless of migration or displacement. In 2023, a partner in Kachin consequently piloted a tailoring skills training program for women and girls in displacement camps that successfully allowed participants to earn income from their new skills, reducing the need for them to resort to irregular migration or accept work under possibly deceptive conditions. This underscores the importance of co-designing interventions with survivors and affected communities.

A final strategy used by partners to build community resilience and reduce high-risk decision-making was the prioritisation of community-based initiatives that address "severely lacking" psychological support services. Partners noted that communities have been exposed to multiple forms of violence, particularly in conflict-affected areas, leading to cases of self-harm and attempted suicide. However, awareness of and access to psychological support was extremely limited. Partners therefore provided psychological support — including group counselling — to reduce stigma around mental health issues, address emotional distress and loss of identity, reduce the risk of harmful coping mechanisms such as violence and self-harm, and help individuals to think more clearly and make safer choices. Partners delivered in-person services when access was possible, and also remotely supported local volunteers to lead groups if access was restricted.

As a single mother of four, I've long struggled to balance earning a living and caring for my children. The stress from armed-conflict, work and household responsibilities often left me exhausted, and I would sometimes shout at my children out of frustration. But after receiving psychosocial support training from [Partner 1], I've learned how to manage my emotions and improve my mental well-being. Now, instead of reacting with anger, I sing, shift my focus or find calm through small moments of joy. My relationship with my children has improved, and my neighbours have noticed the change. Many now invite me to lead psychosocial support activities in their homes.

Female member of grassroots volunteer groups formed by Partner 1 in Kachin State

Like awareness raising interventions, partners observed that community-level psychosocial activities built empathy towards survivors of trafficking, reducing their stigmatization, discrimination and exclusion. These activities targeted at-risk groups and villages where survivors had returned or been identified.

#### Strengthening community-led anti-trafficking strategies in contexts of vastly restricted access

The SAC's weakened governance and limited territorial access have severely disrupted basic services across Myanmar, including support for trafficking survivors. These challenges have been compounded by regional armed conflict, insecurity, robbery, looting, border closures, increased security checks and disrupted communication networks. Together, these impede access to communities and the delivery of material aid, as well as hindering the detection, repatriation, and reintegration of survivors. Faced with vastly reduced access and the absence of functional formal systems, our partners adopted several adaptive strategies to maintain community engagement.

Firstly, our partners shifted to low-profile operational models to maintain access, minimize risk to survivors, communities, and other CSOs, and reduce legal risks. This shift has been largely driven by the 2022 ORL that limits freedom of association by mandating the registration of all organisations regardless of size or purpose. This forced organisations led by ethnic leaders and/or those unable to fully comply to operate discreetly. Low-profile approaches adopted by CSOs typically involve limiting organisational visibility, sharing information through trusted networks, reducing engagement with the SAC and safeguarding partner identities. Specific adaptations used by our partners included staff adoption of pseudonyms, avoidance of identifiable logos or politically sensitive language in public and a shift to virtual or low-profile programming such as online activities and events. For instance, one partner in Kachin and Northern Shan provided support to survivors via a hotline which was shared discreetly with community leaders and volunteers during outreach activities rather than publicly disseminated. To support low-profile approaches, the Freedom Fund encouraged its normal practice of not requiring public visibility for its support. It also did not have any direct engagement with SAC authorities.

One of the most important strategies was partners placing greater emphasis on strengthening and mentoring grassroots volunteer groups to deliver community-led outreach and awareness raising when digital or physical gatherings were not feasible. This aligns with the focus on empowering local actors promoted by the AtiP Law. They increased allocation of resources to community-led initiatives, including the provision of travel and communication allowances for volunteers alongside mentorship in Kachin State and Northern Shan. Despite notable contextual challenges, our partners successfully provided in-person and online training for 200 volunteers — including 47 survivors — on trafficking, related laws, gender-based violence (GBV) response and survivor referrals.

In Kachin State and Northern Shan, [our staff] face significant safety risks when travelling between villages...we [therefore] trained and engaged volunteers from local communities. Despite restrictions on gatherings and curfews, our volunteers successfully continued awareness-raising and psychosocial support activities through dialogue and negotiation with ward and village leaders. Initially, training was delivered jointly by project staff and volunteers, but over time, the volunteers developed the confidence and skills to independently lead sessions and field activities, with ongoing remote and in-person mentorship from our team. A key outcome...has been the exchange of information between villagers, which has strengthened connections and built friendships, enabling them to rely on each other, share resources and enhance community resilience.

**Program Coordinator, Partner 1** 

The grassroots actors trained by our partners have since stepped into key roles in prevention and survivor assistance. In Kachin State, women leaders in displacement and urban settings have raised awareness of trafficking risks among youth and reported cases, while in the Yangon region, Community Watch Groups formed through churches have carried out prevention activities and responded to local cases of exploitation. In Northern Shan State and Kachin Independence Army (KIA) administrative areas, training and mentorship has enabled community-led local action teams to provide counselling, mediation, and emergency support to trafficking and GBV cases.

The Freedom Fund also responded to the need for donors to listen to and respect the local knowledge and expertise of partners, including their choices over which grassroots actors to capacitate:

We honour the leadership of local communities by trusting them to decide whom to engage and which counterparts to work with in liberating survivors and pursuing justice. Our grant funding is dedicated to providing direct assistance to survivors and their families during times of crisis, as well as strengthening the safeguarding and trauma-informed practices of local organisations.

Senior Program Manager, The Freedom Fund

This trust, which builds on multi-year partnerships, is essential in conflict settings where local partners are frequently asked to bear the main bulk of operational risks, including security risks.

#### Navigating formal and alternative systems to support survivor recovery and access to justice

Before 2021, Myanmar was strengthening the formal judicial system for supporting survivors of trafficking. CSOs collaborated with the Anti-Trafficking Task Force to rescue and assist individuals trafficked both abroad and domestically through formal reporting mechanisms and survivor referral systems. However, since the military coup, even where court systems remain operational in SAC-controlled areas, local partners have reported that survivors of trafficking and GBV face significant delays during legal proceedings. Lawyers reported that "routine" criminal matters, including domestic violence cases, have been substantially slowed or halted in various regions, as courts and law enforcement agencies focus on suppressing dissent.<sup>28</sup> This, along with the emergence of alternative systems in autonomous areas, has forced CSOs to adjust how they support survivors to access justice.

In cases where local service providers maintain limited but functional relationships with SAC authorities, one of our partners continued to invest in these relationships to facilitate survivors' access to justice, including supporting on cases of emerging online exploitation:

With an increased presence of perpetrators online...we're now actively monitoring online recruitment for forced marriage, child-bearing and surrogacy [advertisements] on platforms like TikTok and Facebook, and we're sharing this information with the Anti-Trafficking Task Force Police and the wider anti-trafficking community in Myanmar.

**Program Manager, Partner 3** 

By reporting and sharing potentially exploitative social media posts with a specialised task force under the SAC, this partner contributed to Myanmar's first prosecution of online trafficking perpetrators in 2025. This highlights the potential of constructive, coordinated partnerships between CSOs and law enforcement in digital monitoring and the protection of at-risk groups, even amid ongoing crises.

Nonetheless, partners noted that their efforts to coordinate with the SAC depended heavily on local relationships and varied by location. In cases where partners were forced to use a low-visibility approach, they were forced to adjust their ways of assisting survivors who required support to navigate formal justice systems. For example, a lawyer from one of our partners explained that the ORL's registration requirements had impacted the CSO's ability to accompany survivors to report cases or attend police and court procedures.

We don't file cases or accompany survivors to court ourselves anymore due to our organisation's registration status, but we support survivors who want to take legal action by helping them prepare – like advising on how to present evidence, drafting case documents, and offering guidance. When public prosecutors or the Anti-Trafficking Task Forces reach out to us, we make it clear that we don't handle cases directly anymore, but we're still here to provide support behind the scenes.

Lawyer, Partner Organisation 2

The CSO had consequently switched to remote emergency assistance and legal guidance, including 'behind the scenes' support on drafting formal legal filings and presenting cases.

Partners also provided up-dated information on access to justice and survivor support in both ethnic and SAC administrative regions, and established coordination with alternative systems. This included those facilitated by the KIA, which aims to support repatriation, reintegration and alternative justice for trafficking cases occurring in Kachin State, Northern Shan and the China–Kachin border areas.

One Kachin woman from Bhamo, Kachin State, was trafficked to China after being deceived by a broker who promised her a job. When she eventually returned, she was able to bring the case to the KIA court. Although it was difficult to present clear evidence, the broker received a six-month prison sentence based on their WeChat conversation. However, in some ethnic areas, we continue to see alternative justice systems being applied according to local practices. For example, in a case in Northern Shan, even though the survivor filed a formal complaint, the case was concluded with monetary compensation rather than being processed through formal prosecution

**Program Coordinator, Partner 1** 

Alternative systems could be strengthened in order to offer critical and timely support for rescue, return, and repatriation. Yet, partners noted that these alternative systems are not necessarily survivor-centred, nor do they provide survivors with meaningful access to justice and reintegration support, leaving many in a cycle of vulnerability. Two partners therefore advocated for the Kachin Civil Administration to strengthen long-term support for survivors and provide return and reintegration support, including livelihood support. However, in certain areas, the provision of livelihood support or legal assistance has not been possible due to gaps in the availability of on-the-ground local actors.

## Strengthening coordination between civil society actors to respond to trafficking cases in restrictive operating environments

The absence of effective formal systems has increased reliance on informal coordination and networks between different community actors to respond to cases of trafficking. For instance, partners described how they coordinated with religious leaders, youth groups, women's groups, volunteers and ethnic armed organisations to rescue trafficking survivors.

[a woman] was trafficked by a broker to Wa State, Northern Shan, under the false promise of employment...upon arrival she discovered that she had been sold to a Chinese man for 40,000 yuan (approximately USD 5,500). She attempted to escape but was captured and beaten. Her family came to our office seeking help. [Partner 2] immediately initiated efforts to secure her release, including sending a formal letter to the relevant authorities in Wa. We coordinated with a local faith-based group to assist in her safe rescue. We supported her with travel expenses and later provided livelihood support to help her rebuild her life.

Program Manager, Partner 2

Partners emphasised the commitment and courage of volunteers and community-based partners, who identified rescue routes, supported the safe return of survivors, reported cases to CSOs and even provided temporary shelter for survivors in their own homes.

Although Freedom Fund partners have long-standing relationships with other community-based actors, fractured coordination mechanisms and the need for lower-visibility nonetheless weakened civil society collaboration. This has led to gaps in referral pathways that, in turn, reduce survivors'

access to vital response services. Partners therefore focused on proactively reconnecting and rebuilding trust with fellow frontline actors to strengthen their response, turning to more hands-on ways of maintaining referral pathways and relationships with other CSOs. For example, one partner conducted in-person visits and virtual check-ins to verify NGO operational service points and strengthen referral pathways, enabling them to continue to refer trafficking cases to other active and trusted peer organisations. This demonstrates resilience and adaptability in navigating a restrictive and insecure context while maintaining vital support for survivors.

Partners also engaged with more structured civil society networks, including humanitarian coordination networks:

We've been working closely with local CSOs, church groups and religious leaders to support survivors with logistics and travel. We also take part in the GBV working group, and the peer support network organised by UNFPA to expand our referral and protection networks. On top of that, we've set up a mobile shelter and an anti-trafficking network group in Kachin and Northern Shan to support protection.

Program Manager, Partner 1

Partners in Kachin and Northern Shan coordinated with the GBV Working Group to implement safe houses that serve GBV and trafficking survivors. They also actively contributed to inter-agency discussions about the protection needs of GBV survivors who have experienced sexual exploitation, labour exploitation and forced marriage to Chinese men in Pangwa and along the Myanmar-China border. However, partners reported limited engagement and infrequent inclusion of trafficking responders within the wider humanitarian protection sector in Kachin State and Northern Shan, resulting in missed opportunities to share insights and address the heightened vulnerability of conflict-affected communities to trafficking.

Recognising the need for a coordinated response to cross-border trafficking, the Freedom Fund and Johns Hopkins University convened thirteen CSOs from Cambodia, Laos, Myanmar, Thailand and Vietnam in October 2024 to strengthen collaboration against trafficking of women and girls, including for marriage. Since the military coup, Myanmar has also become a major hub for trafficking foreign nationals into scam compounds along its borders. Participating CSOs emphasised the need to support CSOs located in border areas to provide timely assistance and safe migration information to survivors in transit, while also building trust and knowledge-sharing among organisations. This has become increasingly urgent and relevant for cross-border case referral and assistance, due to the surge in intra-regional trafficking following covid-19, Myanmar's armed conflict and the weakening of trafficking responses across the country.

In 2024 and 2025, the Freedom Fund also actively contributed to the drafting and consultation process led by the ASEAN Commission on the Promotion and Protection of the Rights of Women and Children's Working Group on the ASEAN Guideline on the Prevention of and Response to Child and Forced Marriage in the Context of Trafficking in Persons. ASEAN guidelines are non-binding, consensus-based frameworks designed to strengthen regional cooperation, align policies and promote best practices across the ten member states. Although not legally enforceable, supporting the development of ASEAN guidelines is a strategically important step in strengthening coordinated responses to TiP. The forthcoming guidelines on child and forced marriage – expected to be launched in November 2025 – will help establish shared standards, improve cross-border coordination, and influence national laws and policies, particularly in countries where legal frameworks remain under development. Our engagement ensured that survivors' experiences were heard and that the contributions of CSOs were highlighted through case studies, operational insights, research-based evidence and lived-experience contributions.



## **CONCLUSION**

The experience of local frontline anti-trafficking actors in Myanmar since the covid-19 pandemic and 2021 military coup provides important insights for addressing trafficking in crisis-affected contexts. Despite heightened risks, restrictions on civic space and limited opportunities for formal coordination, local frontline organisations have continued to deliver critical services to survivors. By adopting low-profile, community-led operational models, they have managed to navigate complex security and legal environments while maintaining access to vulnerable populations. These efforts demonstrate that even in highly constrained settings, targeted and adaptive interventions remain possible, especially when organisations invest in and have confidence in community members' capacity.

Our partners' experiences also underscore the importance of investing in locally grounded strategies that are responsive to emerging forms of exploitation and the realities of conflict-affected environments. Priority should be placed on providing flexible, longer-term funding to frontline CSOs in emergency settings, including those unable to formally register due to legal and security barriers. The flexible funding approaches adopted by the Freedom Fund in our Myanmar hotspot, for instance, allowed partners to include humanitarian interventions in their counter-trafficking programming and adjust their activities and grant forecasts on a quarterly basis to respond effectively to changing circumstances. Moreover, donors are encouraged to adopt compliance frameworks that reflect operational risks while enabling the continued delivery of essential services. Targeted investments are also needed to bolster community-led interventions, establish or maintain discreet remote assistance mechanisms such as hotlines, promote portable and market-relevant livelihood trainings, and strengthen the monitoring of online platforms used for fraudulent recruitment and trafficking-related activities.

Finally, our partners' narratives also demonstrate that strengthened coordination across the anti-trafficking, GBV and wider humanitarian sectors is essential to ensure survivors receive timely, appropriate and holistic support. There is typically significant overlap between anti-trafficking and humanitarian protection programming in emergency settings, providing significant opportunities for cross-learning and greater collaboration that are yet to be fully realised. The transnational nature of trafficking in Myanmar means that cross-border collaboration among civil society actors should be actively supported to improve regional referral pathways – particularly as ongoing conflict, forced conscription, and deepening economic hardship continue to compel individuals to cross borders in search of safety and livelihood opportunities.

## RECOMMENDATIONS

#### CSOs and other anti-trafficking actors to:

- Adopt community-led approaches by establishing survivor and community groups that are trained in counter-trafficking, dialogue and case management, and receive ongoing mentorship. These groups should report trafficking cases to state and non-state actors for survivor identification and assistance, with trusted local CSOs leading the effort and receiving sufficient support to do so.
- Strengthen counter-trafficking efforts in crisis settings by rebuilding trust and adapting coordination among anti-trafficking actors to overcome barriers to collaboration that are exacerbated by low-profile approaches and limited information sharing. Promote effective coordination by ensuring key local trafficking trends and risks are locally understood and shared, at-risk populations are identified and targeted with appropriate preventive interventions, and referral pathways between organisations are preserved, where possible.
- Establish locally operated hotlines, accessible via telephone or online platforms and in local languages, to enable early identification of trafficking or exploitation cases, coordinate rescues, make referrals and respond to concerns from potential survivors.
- Provide safe houses or temporary shelters with integrated mental health support for returning trafficking survivors, in coordination with local humanitarian actors such as GBV service providers where state support is limited. Prioritise shelter assistance in crisis contexts where survivors cannot immediately return home due to insecurity, displacement, or loss of family contact, ensuring it forms a core part of recovery and safe return efforts.
- Provide preventive livelihood support that includes portable, market-relevant skills training for at-risk groups, especially women and girls in displacement settings and urban industrial zones.
   Ensure the meaningful engagement of women-led organisations to design and guide contextspecific and inclusive interventions to prevent trafficking.
- Integrate monitoring of social media platforms such as TikTok and Facebook into countertrafficking efforts to enable timely detection of suspicious recruitment activities.
- Encourage and support local CSOs, especially those operating in border areas, to engage in cross-border collaborations and partnerships with other CSOs to ensure coordinated and timely assistance for survivors during crises.
- Work with humanitarian aid agencies to enhance their understanding of TiP and integrate antitrafficking and survivor support into humanitarian response, with a strong focus on building aid agencies' capacity to deliver flexible support to local frontline CSOs working on anti-trafficking interventions.

#### International donors

- Prioritise preserving and protecting civic space in crisis settings by supporting local organisations through operational capacity building, flexible long-term funding and funder compliance frameworks that allow for appropriate risk tolerance.
- Support frontline organisations to carefully consider whether and how they intend to engage with state and non-state actors. Support constructive engagement with all stakeholders at all stages of TiP responses with local frontline organisations using their contextual knowledge to determine what is safe and worthwhile in order for them to deliver assistance to survivors in crisis settings.

## **ENDNOTES AND IMAGES**

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Image	Page
Putao, Kachin state, Myanmar. @Mongkolchon/Adobe Stock	Cover
Violence Against Women Day event, Kachin State, Myanmar (2024).	3
As above.	4
Community outreach activity, Kachin State, Myanmar, by Community Watch Group (2025).	6
Community outreach activity, Northern Shan, Myanmar, by Community Watch Group (2025).	11

# **VISION**

Our vision is a world free of slavery.

# **MISSION**

We invest in frontline organisations and movements to drive a measurable reduction of modern slavery in high-prevalence countries and industries.

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