

FROM CLICK TO CRIME

How fake job ads fuel irregular migration and trafficking from Pakistan

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List of acronyms

BEOE	Bureau of Emigration and Overseas Employment
BMC	Business Model Canvas
CWA	Community Welfare Attachés
EU	European Union
FIA	Federal Investigation Agency
GCC	Gulf Cooperation Council
ICMPD	International Centre for Migration Policy Development
KP	Khyber Pakhtunkhwa
LEAs	Law Enforcement Agencies
MOPHRD	Ministry of Overseas Pakistanis and Human Resource Development
MRC	Migrant Resource Centre
NCCIA	National Cyber Crime Investigation Agency
OEC	Overseas Employment Corporation
OEP	Overseas Employment Promoters
OSINT	Open-Source Intelligence
PECA	Prevention of Electronic Crimes Act
PKCERT	Pakistan’s National Computer Emergency Response Team
PoE	Protectorate of Emigrants
PSMA	Prevention of Smuggling of Migrants Act
PTA	Pakistan Telecommunication Authority
PTPA	Prevention of Trafficking in Persons Act
RAU	Risk Analysis Unit
UAE	United Arab Emirates
UNODC	United Nations Office on Drugs and Crime

Executive summary

This report examines the growing issue of online fake job advertisements in connection with (irregular) migration, smuggling and trafficking in Pakistan. The report is part of a wider assessment conducted within the framework of the Norwegian-funded project **Prevent Fraudulent Job Advertisements and Cyber Activity as a Facilitator of Irregular Migration and Trafficking in Human Beings (FJA-PAK)**. Drawing upon desk research and consultations with relevant stakeholders at both national and international levels, this report aims to understand and evaluate the overarching social, political, and legal framework underlying the proliferation of online fake job advertisements, as well as the current trends and modus operandi of criminal networks that exploit cyber activities to facilitate (irregular) migration, smuggling, and trafficking from Pakistan.

The following patterns have emerged from the assessment of the situation:

- **Fake job advertisements and migration:** The primary aim of fake online job advertisements related to migration is to defraud potential migrants. In this respect, scams can continue for as long as possible – or at least until the migrant realises the fraudulent intent of the agency. Small but regular payments are usually asked for to avoid suspicion among migrants and detection or prosecution by public authorities. While some ads are linked to smuggling and trafficking, these cases are less common and typically involve higher levels of transnational coordination.
- **Digital platforms in migration-related crimes:** Social media and messaging apps are increasingly used not only to advertise jobs and communicate with migrants but also to manage international payments. Domestically, however, cash remains the predominant payment method, particularly for local migration services.
- **Structure of criminal networks:** Criminal groups involved in fraud, smuggling, or trafficking often operate through informal, loosely connected networks; however, trafficking networks tend to demonstrate greater hierarchy and sophistication.

The national policy framework related to smuggling and trafficking has recently been updated and improved to combat irregular migration and promote regular labour migration from the country. Recent legislation on cybercrime has introduced important provisions to regulate the cyber sphere and the proliferation of cybercrimes. However, some important challenges remain, such as:

- **Distinction between smuggling and trafficking:** Despite legislative efforts to align national laws on smuggling and trafficking with international legal frameworks, the distinction between the two remains difficult to discern in practice, creating operational challenges for law enforcement agencies.
- **Overgeneralisation of online criminal activity as cybercrime:** The broad categorisation of all online criminal activities under the umbrella of cybercrime risks overburdening specific law enforcement units, obscuring important links between online and offline criminal networks, and reducing penalties for criminals.

To address the issue of fraudulent job advertisements, the focus should be on:

- **Strengthening coordination mechanisms:** Establishing clear lines of authority, standardised procedures, and joint task forces is essential to tackle complex transnational crimes.

- **Investing in technology and training:** Modernising communication systems, investing in data-sharing platforms, and providing training to law enforcement personnel are crucial for improving investigative capabilities and collaboration.
- **Building trust and fostering collaboration:** Regular meetings, joint training exercises, and shared case reviews can help build trust and improve coordination and communication between agencies.

In conclusion, it is undeniable that in recent years Pakistan has made important social and legislative changes to facilitate regular migration from the country, prevent and combat migrant smuggling and human trafficking, and protect victims. However, gaps remain in institutional capacity and preventative measures. Addressing these challenges is fundamental to effectively disrupt criminal networks and ensure protection for vulnerable migrants.

1. Introduction

Pakistan has long been among the world's leading sending countries for labour migration, with almost 15 million registered migrants from 1971 to 2025.¹ The countries of the Gulf Cooperation Council (GCC) and the broader Middle East have been the main destinations for this workforce, although there is also a notable trend of Pakistani workers moving to Southeast Asia and to EU Member States, including Romania, Cyprus, and Italy. At the same time, the growing number of people entering the labour market places considerable pressure on an already constrained job market. In addition, worsening social and economic conditions, including widespread unemployment, low wages, and limited access to skills training, further restrict viable opportunities, particularly for young people. Legal migration pathways to many European countries also remain narrow and highly competitive.

Given this context, an increasing number of jobseekers, especially young people, are turning to alternative and often riskier means of seeking employment abroad. This environment has contributed to a sharp increase in the online circulation of fraudulent job advertisements. These scams typically promise lucrative employment opportunities overseas but are in fact designed to defraud jobseekers. In many cases, victims are exposed to severe exploitation and, in some instances, human trafficking. The recent tragedies in the Mediterranean Sea and off the West African coasts, where hundreds of Pakistani people lost their lives, bear witness to this disturbing trend.²

Against this backdrop, this report aims to strengthen the knowledge base around the intersection of cyber activities with irregular migration. It presents the results of a wider assessment conducted in the framework of the project "Preventing Fraudulent Job Advertisements and Cyber Activity as a Facilitator of Irregular Migration and Trafficking in Human Beings." Drawing on background research and empirical fieldwork, the report examines existing trends and practices surrounding fake job advertisements, cyber activity, and irregular migration. It also discusses the main modus operandi of criminal groups and presents a typology of fake job advertisements and related cyber activities. The analysis highlights the main actors involved in these practices, their target groups and the methods they use, as well as differences in the types of crime in which they are engaged.

The report's findings are structured in three main sections. The **first section** (Chapter 2) provides a brief outline of the migration dynamics and drivers in Pakistan as well as the regulatory framework behind it, as the context in which fraudulent agents operate is critical to the form and approaches of fake job advertisements in Pakistan. Following a brief discussion of the methodology (Chapter 3), the **second section** (Chapter 4) delves into the main findings from the field, examining in particular at the role of cyber activities in relation to migration and the main modus operandi of criminal groups. The **last section** (Chapter 5) assesses potential gaps and outline key takeaways.

¹ BEOE. 'Country Wise Emigration'. Government of Pakistan - Bureau of Emigration and Overseas Employment, 2026. <https://beoe.gov.pk/reports-and-statistics>.

² Hussain, Abid. 'Mourning in Pakistan as Hundreds Die in Greece Boat Tragedy'. Al Jazeera, 19 June 2023. <https://www.aljazeera.com/news/2023/6/19/day-of-mourning-in-pakistan-as-hundreds-die-in-greece-boat-mishap>.

2. Contextual overview

2.1 Migration from Pakistan and online dynamics: patterns and trends

Pakistan has long been one of the world's leading sending countries for labour migration, primarily for low-skilled workers. Since 1971, the Government of Pakistan has promoted labour migration as a strategy to ease internal economic pressures. According to the Bureau of Emigration and Overseas Employment (BEOE), more than six million migrants have left the country through regular labour pathways over the past ten years (2016-2025). Operating under the Ministry of Overseas Pakistanis and Human Resource Development (MOPHRD), the BEOE has overseen the emigration and overseas employment of this large workforce, regulating the work of the public recruitment agency Overseas Employment Corporation (OEC), the Protectorate of Emigrants, and the 2,669 licenced private Overseas Employment Promoters (OEPs).³ However, the annual outflow of migrants, averaging approximately 800,000 people per year since 2022, has not kept pace with the rapidly growing labour force, with about 1.4 million new jobseekers estimated to enter the labour market annually since 2018.⁴ The inability of the domestic labour market to absorb this workforce results in high unemployment and represents, together with political, security, and socio-cultural factors, one of the main drivers of migration, especially among Pakistani youth.

The GCC countries and the Middle East remain the primary destinations for this outward migration, although there is also a notable trend of Pakistani workers moving to the EU as well as Southeast Asian countries. Despite the recent increase in the number of Pakistani migrants who have entered the EU with permits for remunerated activities, and the strengthening of international cooperation between the Pakistani government and potential countries of destination to negotiate more regular migration pathways,⁵ irregular migration is still perceived by many as the only viable option. Although Frontex data have shown that Pakistani nationals remain well outside the top ten countries of origin for irregular arrivals to Europe in 2025, with about 5,200 detections of irregular entries,⁶ the recent tragedies in the Mediterranean Sea, involving hundreds of Pakistanis, have raised concerns among government representatives and European institutions.

Research has shown that Punjab, Balochistan, and Khyber Pakhtunkhwa (KP) are the main provinces of origin of migrants, with certain districts showing a high propensity for irregular migration due not only to difficult socio-economic conditions but also to longstanding social and cultural factors.⁷ Migrants are often influenced by the success stories of others who have gone abroad and achieved

³ BEOE. 'List of Overseas Employment Promoters (OEPs)'. Government of Pakistan - Bureau of Emigration and Overseas Employment, 2026. <https://beoe.gov.pk/list-of-oeps?show=active>.

⁴ Najam, Adil, and Faisal Bari. Pakistan National Human Development Report. Unleashing the Potential of a Young Pakistan. United Nations Development Programme, 2017. <https://hdr.undp.org/system/files/documents/pk-nhdr.pdf>.

⁵ ICMPD. Migration Outlook 2025 Silk Routes. Five Migration Issues to Look out for in 2025. International Centre for Migration Policy Development, 2025. <https://www.icmpd.org/file/download/63924/file/ICMPD%2520Migration%2520Outlook%2520Silk%2520Routes%25202025.pdf>.

⁶ FRONTEX. Annual Brief 2025. European Agency for the Management of Operational Cooperation at the External Borders, 2026. https://www.frontex.europa.eu/assets/Publications/Risk_Analysis/2025/Annual_Brief_2025.pdf.

⁷ Qaisrani, Ayesha, Katharina Hahn-Schaur, and Maegan Hendow. Irregular Migration Dynamics from Pakistan and the Role of Information Campaigns. PARIM Final Report. International Centre for Migration Policy Development, 2021.

financial stability. This social pressure, combined with a lack of information and limited access to reliable sources of information, contributes to a willingness to overlook warning signs such as lax visa requirements and lower upfront costs.

The structural conditions of the Pakistan economy and the lack of regular migration pathways exacerbate the vulnerabilities of potential migrants, making them more susceptible to exploitation, scams, and harm. Alongside official migration channels, a parallel, unlawful recruitment industry has developed. Unlicensed agents often take advantage of prospective migrants' limited awareness of procedural requirements, exposing them to fraudulent practices or luring them into deceptive foreign employment schemes. Low-skilled workers, especially those willing to migrate irregularly, become vulnerable to exploitation and abuse, including deception about the nature and conditions of work, withholding of passports, unlawful wage theft, and debt bondage. These abuses can escalate to human trafficking and forced labour.⁸

These fraudulent recruitment practices for overseas employment have become particularly common online. As of 2024, about 142 million Pakistanis, or 57% of the population, were using the internet, with widespread access to social media.⁹ This digital connectivity has also exposed many vulnerable jobseekers to cybercrime, including fraud, smuggling, and trafficking in human beings. According to the United Nations Office on Drugs and Crime (UNODC), in 2022, 115 out of 187 requests for forensic analysis in the Cybercrime Cell of the Federal Investigation Agency (FIA) were related to migrant smuggling and human trafficking.¹⁰ Fraudulent recruitment agents also promise potential migrants lucrative employment opportunities abroad and induce them to make advance payments before disappearing with their money. Traffickers and smugglers often use online platforms to promote smuggling services and facilitate irregular migration, disseminate misinformation, and advertise fraudulent foreign employment opportunities that do not exist or that lead to exploitation or even trafficking, including forced labour and sexual exploitation. Social networks such as YouTube and TikTok are increasingly used to provide testimonials and showcase purportedly successful migration journeys, thereby luring potential victims. Leveraging social acceptance of irregular migration and weak regulatory oversight, fraudulent agencies continue to operate and proliferate despite government efforts to regulate the recruitment process and prohibit unlicensed agents.¹¹

2.2 Legal and policy frameworks

The governance of fraudulent online job advertisements targeting potential migrants is supported by an extensive and multifaceted legal framework encompassing a range of laws, regulations, and policies. Pakistan has separate laws governing overseas recruitment, cybercrime and fraudulent digital activity, migrant smuggling, and human trafficking, often with separate implementing agencies or departments, each with its own specific mandates, resources, capacities, and protocols. While this broad regulatory structure allows for wide coverage, the intersection of these areas often falls into a

⁸ ILO. Law and Practice. The Recruitment of Low-Skilled Pakistani Workers for Overseas Employment. International Labour Organization, 2016. https://mfasia.org/recruitmentreform/wp-content/uploads/2016/12/Law-and-Practice_The-Recruitment-of-Low-Skilled-Migrant-Workers-from-Pakistan.pdf.

⁹ Pakistan Telecommunication Authority. PTA Annual Report 2024. Pakistan Telecommunication Authority, 2024.

¹⁰ UNODC. 'Investigating and Prosecuting Human Trafficking and Migrant Smuggling in the Digital Age: UNODC Facilitates a Workshop on Electronic Evidence'. United Nations Office on Drugs and Crime, 2023.

¹¹ See also Qaisrani et al., Irregular Migration Dynamics from Pakistan and the Role of Information Campaigns.

grey zone marked by functional overlaps and shared accountability. For a clearer understanding of the legal structures in place, the discussion below addresses each topic separately.

Overseas recruitment

Since 1979, the **Emigration Ordinance (updated in 2022)**,¹² together with **the Emigration Rules**, has served as the primary legal framework for promoting and regulating the emigration and overseas recruitment of Pakistani citizens, advocating for their rights, and ensuring their welfare (see Table 1 below). The Ordinance sets out the key elements of the governance structure related to labour migration, the regulation of OEPs, and the welfare and grievance redressal mechanisms available to labour migrants. It is complemented by the Emigration Rules of 1979 (updated in 2021),¹³ which provide detailed provisions on the implementation of the Ordinance, the rules and responsibilities of implementing agencies and related stakeholders, and the criteria for foreign recruitment. The Rules also include regulatory mechanisms relating to the licencing and oversight of employment promoters, as well as penalties for informal recruitment practices.

Table 1: Selected clauses from Emigration Ordinance and Rules

Document	Section	Relevance
Emigration Ordinance	Section 9	Prohibition of recruitment or advertisement without approval of DG Protector of Emigrant of the area
	Section 12	Licencing of Overseas Employment Promoters (OEPs)
	Section 13	Revocation of licence for OEPs
	Section 17	Penalisation of unlawful emigration (cause or assist irregular migration). This Section also makes it punishable to support emigration of someone without acquiring an approval from the Protector of Emigrants (PoE)
	Section 18	Penalising fraudulently inducing emigration, including through forged documents
	Section 19	Related to false representation of government authority
	Section 22	Violation of fee structure
Emigration Rules	Rule 7	Unauthorised persons not to assist in emigration
	Rule 11	Prohibition on OEPs to appoint sub-promoters
	Rule 15	Service charges (prohibits OEPs to charge anything beyond the prescribed service charge of PKR 6000 and actual cost incurred for air tickets, medical certificates, work permits, visas, and documentation)
	Rule 21	Verification of the job contract by the POE
	Rule 25	Code of conduct for OEPs
	Rule 27	Violation of foreign services agreement
	Rule 31	Prohibition of minors on emigration for work

All matters related to international migration broadly fall under the mandate of the **Ministry of Overseas Pakistanis and Human Resource Development (MOPHRD)**, which has dedicated departments or wings focusing on Workers Welfare, Emigration, Administration of Overseas Pakistanis, and Policy Planning. The operational management of labour migration from Pakistan falls under the jurisdiction of the **Bureau of Emigration and Overseas Employment (BEOE)**, a department within MOPHRD.

¹² Government of Pakistan. 'Emigration Ordinance 1979'. 1979. <https://natlex.ilo.org/dyn/natlex2/natlex2/files/download/37915/PAK37915.pdf>.

¹³ BEOE. Emigration Rules 1979 (Updated 2021) (1979). <https://beoe.gov.pk/files/legal-framework/rules.pdf>.

Established in 1971, the BEOE was created to regulate and promote the emigration of workers from Pakistan, protect their rights and advise the government on relevant policies and procedures (see Box 1 below). It has the authority to register and oversee the network of OEPs and to provide pre-departure briefings to emigrants. All migrant workers are required to register with the BEOE's **Protectorate of Emigrants** in order to receive pre-departure training and useful information regarding grievance redressal, language, and cultural orientation. The BEOE also manages the mandatory life insurance that every emigrant must obtain before leaving the country.

Box 1: Main functions of BEOE. Source: BEOE website

- Controlling and regulating emigration under the Emigration Ordinance, 1979.
- Promoting Emigration of Pakistani Citizens.
- Protecting the interest and welfare of the emigrants.
- Advising the Federal Government on emigration policies and procedures.
- Monitoring and supervising Overseas Employment Promoters through ten Protectorates of Emigrants Offices and three sub-offices.
- Processing Overseas Employment Promoters (OEP) licences.
- Pre-departure briefing to emigrants.
- Mandatory insurance coverage to Pakistani workers abroad.
- Memorandum of Understanding with Foreign Countries for Export of Manpower.
- Management of State Life Emigrants Insurance Fund (SLEIF).

While the BEOE serves as the regulatory body, recruitment of workers for foreign jobs takes place through either private OEPs or the OEC, the public recruitment agency that recruits only through government-to-government agreements. OEPs obtain their licences from the BEOE, as directed by the Emigration Ordinance, and the BEOE maintains a list of active, licensed OEPs on its website, together with information on whether an OEP's licence has been revoked or suspended on the basis of complaints or fraudulent activity by the OEP. OEPs are mandated to follow **the Procedures for Overseas Employment**, a detailed guiding document that serves as the standard operating procedures (SOPs) for the recruitment of workers for foreign demand (see Box 2 below).

Box 2: Procedures for overseas employment.

1. OEPs receive a demand letter from a foreign employer outlining job categories, number of vacancies, and employment terms.
2. The OEP submits a request to the relevant PoE for approval to process the recruitment.
3. Once approved, job vacancies are advertised in leading national newspapers. OEPs may also recruit from their databanks or waitlist of workers.
4. The recruitment process is completed either by the foreign employer, their representative, or the OEP acting on behalf of the employer.
5. Selected candidates are registered with the relevant PoE.
6. Before departure, workers receive a briefing on the Foreign Service Agreement (FSA), applicable regulations, and their rights and responsibilities in the destination country.

Together with Rule 25 of the Emigration Rules, which establishes the code of conduct for OEPs, the Procedures for Overseas Employment provide a detailed explanation of the SOPs for OEPs and define the criteria for the recruitment of workers for foreign demand, including the obligation for licensed

OEPs to maintain a regular physical office for their activities, keep track of all candidates they send abroad, and ensure that the employer pays the migrant no less than the amount stated in the contract. Section 2(xvi) of Rule 25 directly addresses OEPs' involvement in visa fraud by stating that "no Overseas Employment Promoter shall get involved, help or assist any person in illegal activities, like forged visas, bifurcation of group visas, use of visit, study or Umra visas for employment abroad." Paragraph 8 of the Procedures is also relevant, as it focuses on the advertisement of approved foreign demand for labour. It requires OEPs to publish an advertisement in the newspaper if the foreign demand is for more than 30 workers, and to clearly state in the advertisement the name of the country of employment, the OEP's own title and licence number, the permission number, the number of available jobs, the contract duration, and other fringe benefits.

Other important actors are **Community Welfare Attachés (CWAs)**, who are posted in selected Pakistani missions abroad.¹⁴ In addition to grievance redressal, dispute resolution, and addressing the concerns of migrants in destination countries, CWAs are responsible for visiting worksites, monitoring the working conditions of Pakistani workers, and reporting back to the BEOE. In addition, the **Overseas Pakistanis Foundation (OPF)** is mandated to safeguard the interests of overseas Pakistanis and their families in Pakistan through a range of services, including management of its pension fund through investment in educational institutes, vocational training centres, and housing schemes, complaint resolution, legal support for grievances, and repatriation of the remains of Pakistanis who die abroad.

In terms of policy documents, Pakistan's **National Emigration and Welfare Policy (draft)**, developed for the first time in 2018, is currently awaiting Cabinet approval. The document sets out strategic policy priorities in relation to migration, focusing in particular on i) promoting international migration through skills development and digitalisation of the emigration process; ii) engaging the Pakistani diaspora in national development efforts; iii) developing official channels for the transfer of remittances; iv) improving workers' welfare and protection; and v) strengthening reintegration capacities for returned migrants. The draft policy also proposes reinforcing the legislative basis on emigration, including a revision of the Emigration Ordinance and Rules, and outlines more refined steps to improve the emigration process for Pakistani workers in order to ensure their welfare and protect them from abuse and deception.

Migrant smuggling and human trafficking

At the international level, migrant smuggling and human trafficking are defined in two separate Protocols to the United Nations Convention against Transnational Organized Crime, signed in Palermo in 2000. The **Protocol against the Smuggling of Migrants by Land, Sea and Air** defines smuggling of migrants as "the procurement, in order to obtain, directly or indirectly, a financial or other material benefit, of the illegal entry of a person into a State Party of which the person is not a national or a permanent resident." This definition implies three main characteristics:

- The exchange of various forms of benefits to procure illegal entry;
- the action of crossing a state border without proper authorisation;

¹⁴ Pakistan has 24 CWAs in 16 destination countries, namely six in Saudi Arabia, three in the UAE, two in Qatar, and one each in Bahrain, Greece, Iraq, Italy, Japan, Kuwait, Malaysia, Oman, South Africa, South Korea, Spain, the UK, and the USA. Source: <https://beoe.gov.pk/community-welfare-attache-offices>.

- the legal breach of national laws related to that act.

The **Protocol to Prevent, Suppress and Punish Trafficking in Persons, especially Women and Children**, defines trafficking as “the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation.” In this respect, trafficking implies:

- The action of recruiting, transporting, transferring, harbouring or receiving a person;
- the means through which this action is carried out, including threat of or use of force, deception, coercion, abuse of power, or a position of vulnerability;
- a specific purpose, which is always exploitation.

The official definitions of smuggling and trafficking allow for a clear distinction between the two across five main variables, although in practice it can be difficult to distinguish between the two, particularly from a country of origin perspective (see Box 3 below):

- **Consent:** Although often undertaken in dangerous or degrading conditions, migrant smuggling involves consent, while trafficking victims have either never consented or, if they initially did, that consent has been rendered meaningless by the coercive, deceptive, or abusive action of the traffickers. In the case of children, this distinction is irrelevant.
- **Duration of the interaction:** While migrant smuggling ends with the arrival of migrants at their destination, trafficking involves the ongoing exploitation of the victim and can continue for years.
- **Transnationality:** Smuggling is always transnational, whereas trafficking may not be. Trafficking can occur regardless of whether victims are taken to another state or moved within a state’s borders.
- **Source of profits:** While profits in smuggling cases are derived from the transportation or facilitation of the illegal entry or stay of a person into another country, profits in trafficking cases are derived from the exploitation of the victim.
- **Type of crime:** Smuggling of migrants is a crime against the state and the state migration laws, while trafficking is a crime against the person and violates the person’s human rights.

Box 3: Difficulties in defining and interpreting smuggling and trafficking

Smuggling and trafficking: Clear definitions, challenges in practice

While the legal definitions of smuggling and trafficking may appear straightforward, in practice they often intersect, particularly from the perspective of migrants and countries of origin. Migrants may begin their journeys voluntarily, but circumstances during the migration process – such as restricted mobility, lack of information, or coercive intermediaries – can shift the nature of their experience towards exploitation. In some cases, smuggling and trafficking can occur within the same journey: research on the Western Balkans migration route found that many of the identified trafficking cases were connected to smuggling situations, “either because people

needed to pay for smuggling, or because those providing migrant smuggling services directly exploited the service-users.”¹⁵

The practical difficulty in drawing the line between smuggling and trafficking has concrete repercussions, not only for accurately estimating the scale of the problem but also for defining the issue and prosecuting cases. This challenge is particularly acute for countries of origin, where migrants may not realise they are being trafficked until they reach their destination. Moreover, as previous research has shown, even governmental stakeholders, national institutions, and policymakers often conflate smuggling and trafficking, making it difficult to analyse and evaluate the situation.¹⁶ In a well-known study, Huijsmans and Baker asked 37 anti-trafficking professionals to evaluate ten real-world case studies. In six of these cases, there was significant disagreement among respondents, with fewer than 60% reaching the same conclusion about whether the situation constituted trafficking.¹⁷ This ambiguity also complicates the work of prosecutors and judges, raising questions about where the line lies between smuggling and trafficking in practice. Furthermore, dominant policy responses tend to treat smuggling and trafficking primarily as criminal issues. This leads to a heavy emphasis on punitive state measures, including strengthened border controls, increased securitisation and even the criminalisation of victims, without addressing the structural drivers of displacement. By framing migration as a security problem rather than a complex social process, such approaches risk ignoring the root causes of forced and irregular migration, as well as the increased vulnerabilities created by the very restrictions intended to control them.

At the national level, matters related to irregular migration, migrant smuggling, and trafficking are governed by two dedicated laws. In 2018, the Government of Pakistan introduced the **Prevention of Trafficking in Persons Act (PTPA)**, which criminalises trafficking for the purpose of labour or sexual exploitation, with penalties up to seven years’ imprisonment and a fine of up to PKR 1 million (approximately €3,000). The PTPA replaced the 2002 Prevention and Control of Human Trafficking Ordinance, which focused primarily on transnational trafficking and lacked provisions to address internal trafficking. It also failed to distinguish between trafficking and smuggling, sometimes resulting in the criminalisation of victims.¹⁸

The definition of trafficking in the PTPA reflects that in the UN Protocol on Trafficking, which Pakistan has recently begun the process to ratify. The PTPA defines traffickers as, “any person who recruits, harbours, transports, provides or obtains another person, or attempts to do, for compelled labour or commercial sex acts through use of force, fraud or coercion, commits an offence of trafficking in persons.” The law also includes provisions for the safety and protection of victims. Section 14

¹⁵ Healy, Claire. The Strength to Carry on – Resilience and Vulnerability to Trafficking on Migration Routes to Europe. Briefing Paper. International Centre for Migration Policy Development, 2019. https://www.icmpd.org/file/download/56491/file/STRIVE_Briefing_Papaer_English.pdf.

¹⁶ Aksel, Damla B., Angeliki Dimitriadi, Maegan Hendow, et al. ‘Study on Smuggling of Migrants: Characteristics, Responses and Cooperation with Third Countries. Case Study 3: Pakistan – Turkey – Greece’. In European Migration Network Report. European Commission - DG Migration & Home Affairs and European Migration Network., 2016. https://www.emnitalyncp.it/wp-content/uploads/2018/02/022_case_study_3_pakistan_-_turkey_-_greece.pdf.

¹⁷ Huijsmans, Roy, and Simon Baker. ‘Child Trafficking: “Worst Form” of Child Labour, or Worst Approach to Young Migrants?’ Development and Change 43, no. 4 (2012): 919–46. <https://doi.org/10.1111/j.1467-7660.2012.01786.x>.

¹⁸ Inam, Zunaira. Perilous Journeys: Unravelling Irregular Migration from Pakistan. National Commission on Human Rights and IOM, 2024. https://pakistan.iom.int/sites/g/files/tmzbd1121/files/documents/2024-06/perilous-journeys-unravelling-irregular-migration-from-pakistan_0.pdf.

specifically addresses public awareness-raising about trafficking in persons and the dangers faced by victims, calling for more research and cooperation between national and international bodies to strengthen capacities to address the issue.

The PTPA is supported by the PTPA Rules of 2020, which focus on the operationalisation of the law and procedural mechanisms. These rules cover aspects such as actions and obligations upon receiving information on trafficking in persons (Rule 3), procedures for the identification of victims (Rule 4), trafficking of minors (Rule 8), conduct of investigations (Rules 19–20), referrals by investigating agencies (Rule 31), awareness and outreach (Rule 41), creation of databases (Rule 43) and coordination of the Act’s implementation (Rule 44).

In addition to the dedicated law, trafficking is also criminalised under Section 396-A of the **Pakistan Penal Code 1860**, under labour protection laws and in certain provincial legislation, such as the **Punjab Restriction on Employment of Children Act 2016**. Some argue that this duplication of criminalisation dilutes the legal framework on trafficking in human beings and weakens the criminal justice response to such crimes.¹⁹ For example, the 2024 Trafficking in Persons Report notes that, at the provincial level, law enforcement authorities often invoke less stringent provincial laws rather than consistently enforcing the national law.²⁰ Critics and activists also highlight inherent challenges in PTPA enforcement, including weak evidence collection mechanisms and inadequate cooperation between investigators and prosecutors.²¹

To strengthen the regulatory framework against irregular migration and migrant smuggling, the Government of Pakistan enacted the **Prevention of Smuggling of Migrants Act (PSMA)** in 2018. The Act penalises smuggling and covers offences related to documents used to facilitate smuggling. For instance, Section 4 criminalises the intentional production or attempted production of a document for the purpose of enabling smuggling, as well as procuring, providing, possessing or attempting to possess such documents for profit from smuggling. Importantly, the Act also decriminalises irregular migrants themselves (Section 8).

The PSMA is complemented by Rules introduced in 2020 that detail the implementation mechanisms. These Rules address both smuggling into and out of Pakistan, offering protection to smuggled migrants on the grounds that they may be victims of trafficking, minors or otherwise vulnerable due to exploitation. They also establish mechanisms for the investigation of smuggling-related offences.

In February 2025, the Pakistani Parliament proposed three bills: the **Prevention of Trafficking in Persons (Amendment) Bill**, the **Prevention of Smuggling of Migrants (Amendment) Bill**, and the **Emigration (Amendment) Bill**. These bills impose stricter penalties for offences related to migrant smuggling, irregular migration and trafficking in human beings, following recent boat incidents

¹⁹ Adil, Kamran. ‘Criminal Justice Response to Human Trafficking in Pakistan’. Research Society of International Law, 4 April 2023. <https://rsilpak.org/2023/criminal-justice-response-to-human-trafficking-in-pakistan/>.

²⁰ U.S. Department of State. 2024 Trafficking in Persons Report: Pakistan. United States Department of State, 2024. <https://www.state.gov/reports/2024-trafficking-in-persons-report/pakistan/#:~:text=The%202018%20PTPA%2C%20as%20amended,of%20up%20to%201%20million.>

²¹ Ibid.

involving significant Pakistani casualties en route to Europe.²² The Emigration Bill in particular proposes changes to the legal wording around offences such as unlawful emigration and fraudulent inducement to emigrate. These amendments would remove judicial discretion in sentencing, making imprisonment mandatory alongside fixed fines, rather than allowing courts to impose a fine, imprisonment, or both. These changes reflect the government’s broader policy of controlling irregular migration through a stringent crackdown on migrant smugglers and their networks.

Table 2: Main national legislation and relative clauses on smuggling and trafficking

Document	Section	Relevance
The Prevention of Trafficking in Persons Act (2018)	Section 3	Defines trafficking in human beings
	Section 4	Defines “aggravating circumstances” including activity of an organised criminal group (b), and confiscation or destruction of any travel document (c)
	Section 5	Focuses on abetment and criminal conspiracy
	Sections 6, 7, 11 12 and 13	Relate to protection and safeguards of victims of trafficking
The Prevention of Trafficking in Persons Rules (2020)	Rule 3	Defines the actions and obligations on investigation agency on receiving information disclosing trafficking in human beings
	Rule 4	Offers guiding principles on identification of victims
	Rules 12 -21	Focus on investigation procedures
	Rules 31-33	Relate to referral mechanisms
	Rule 40	Focuses on repatriation of Pakistani victims from abroad
The Prevention of Smuggling of Migrants Act (2018)	Section 3	Describes the punishment for smuggling
	Section 4	Focuses on offenses in relation to documents (producing, providing, and possessing a document for the sake of smuggling)
	Section 6	Discusses aggravated offences, including when life or safety of smuggled migrant is in danger, involves a situation of cruel, inhumane or degrading treatment, or offence committed as part of an organised criminal group
The Prevention of Smuggling of Migrants Rules (2020)	Section 7	Criminalises abetment and criminal conspiracy related to smuggling
	Rules 3 - 8	Focus on protection and assistance to smuggled migrants
	Rules 9 - 19	Delineate guidelines for conducting investigation
	Rule 21	Discusses return of smuggled migrants to Pakistan
Pakistan Penal Code 1860	Rules 27-30	Focus on awareness raising and capacity enhancement
	Sections 362, 364-A, 365, 365-A, 367, 368	Focus on abduction
	Section 366-A	On procurement of a minor girl
	Sections 370, 371	Focus on dealing in slave (buying or disposing)
	Sections 371A, 371B	Relates to buying or selling a person for prostitution
	Section 374	Focuses on unlawful compulsory labour
	Section 383 - 387	Criminalise extortion
Section 415 - 420	Focus on cheating	
	Section 480	Discusses use of a false trademark (relevant for fraudulent documents)

Besides the dedicated laws outlined above, other legislation such as the **Pakistan Penal Code (1860)**, the **Travel Agencies Act (1976)**, and the **Travel Agencies Rules (1977)** is also relevant to the phenomenon. As noted earlier, there are some overlaps between the Pakistan Penal Code and the PTPA, particularly regarding offences related to kidnapping (Section 360), abduction (Section 362), and procurement of a person for sex (366-A), among others. The Penal Code also contains provisions

²² Ahmed, Tariq. ‘Pakistan: Parliament Passes Bills to Prevent Human Trafficking and Overseas Organized Begging’. US Library of Congress, 31 March 2025. <https://www.loc.gov/item/global-legal-monitor/2025-03-31/pakistan-parliament-passes-bills-to-prevent-human-trafficking-and-overseas-organized-begging/>.

on cheating, extortion, forgery of documents and misuse of trade or property marks – all elements that fraudulent online agents may exploit for foreign recruitment.

Similarly, the Travel Agencies Act and its accompanying Rules are relevant, as they regulate the operations of travel agencies by requiring them to obtain a licence to operate and imposing a code of conduct and specific obligations. The Act and Rules also establish a Travel Agencies Regulatory Committee, which advises the Federal Government on implementation. Despite this regulation, some travel agencies actively promote fake overseas job offers – increasingly through social media and informal channels – often misleading customers by posing as licensed recruiters. This is particularly prevalent in rural areas, where oversight is more limited and relationships between customers and agents are often stronger.

In terms of relevant institutions, the **Federal Investigation Agency (FIA)** is Pakistan’s leading law enforcement body, tasked with safeguarding national security, protecting the public interest, upholding the rule of law, and combating complex crimes that threaten society. Among its responsibilities, the FIA has the mandate to address, investigate, and respond to issues related to trafficking in human beings and migrant smuggling (see Box 4 below). It operates a specialised **Anti-Human Trafficking and Smuggling Wing**, which manages **Anti-Human Smuggling and Trafficking Circles** in high-risk districts to identify and arrest criminals engaged in these activities.

Box 4: The mandate of the FIA. Source: FIA website.

- Investigation into specialised and organised crime
- Immigration and anti-smuggling
- Personal identification secure comparison and evaluation system
- Anti human smuggling and trafficking
- Counter-terrorism
- Money laundering
- Automated fingerprint identification system
- Intellectual property rights
- Interpol
- National Criminal Database
- Forensic and technical support
- Training and capacity building

Another important department within the FIA is the **Immigration Wing**, which includes the **Risk Analysis Unit (RAU)**. Established with the support of the European Union and implemented by ICMPD under the project “Support to Federal Investigation Agency’s Capacities for Enhanced Risk Management (RAPAK),” the RAU plays a crucial role in strengthening the FIA’s capacity to address irregular migration and improve border and migration management. It achieves this through the collection and analysis of migration data, identification of trends and patterns, risk forecasting, and the development of proactive measures to mitigate them.

The FIA is also the designated agency for engaging in international cooperation on organised crime with Interpol through the **National Central Bureau**. The FIA also works closely with international organisations such as **UNODC** in Pakistan to strengthen the rule of law with regard to transnational

organised crimes including migrant smuggling and human trafficking, as well as with **ICMPD** to enhance capacity in border management.

The **Integrated Border Management System** is an important tool for facilitating intra-agency, inter-departmental, and international cooperation to address unlawful movements of people across Pakistan's borders. More recently, it has been integrated with Interpol's Find System to coordinate efforts to dismantle criminal groups and individuals involved in human trafficking and smuggling.²³

An **inter-agency Task Force** has also been established to address migrant smuggling in a coordinated manner. The Task Force includes federal and provincial law enforcement agencies, including the police, coast guards, Frontier Corps, Rangers, the Maritime Security Agency, the National Database and Registration Authority, the Passport Office, the Ministry of Foreign Affairs, and the Ministry of Information and Broadcasting.

Cybercrime and digital security

Pakistan, like many developing countries, is undergoing rapid digital transformation. The proliferation of smartphones, internet access, and e-commerce offers immense opportunities for economic growth and societal advancement. However, this digital expansion also brings significant challenges related to digital and information security.

The legal framework regulating cybercrime and fraudulent digital activities comprises the **Prevention of Electronic Crimes Act of 2016 (PECA)**, the **Removal and Blocking of Unlawful Online Content Rules of 2021**, and the **Citizen Protection (Against Online Harm) Rules of 2020**. The most relevant provisions of these laws are outlined in Table 3.

Replacing the Electronic Transactions Ordinance of 2002, PECA addresses electronic crimes and unauthorised online activities, along with mechanisms for their investigations and prosecution. Fraudulent digital activities – including electronic forgery (Section 11), electronic fraud (Section 12), and unauthorised use of identity information (Section 14) – are penalised under this law. The basis for determining fraud is the broad intent to wrongfully obtain financial or material gain through deception. The Removal and Blocking of Unlawful Online Content (Procedure, Oversight, and Safeguard) Rules of 2021 establish the process for filing a complaint against online content, oversight and regulatory mechanism for social media platforms, and public awareness campaigns about rights and redressal options. Together, the Act and Rules grant regulatory bodies significant authority over user data and online content moderation.

Since its introduction, PECA has been the subject of heated public debate due to its perceived emphasis on national security over fundamental rights such as freedom of expression and privacy. Despite these criticisms, it remains Pakistan's primary legislation addressing cybercrime and cybersecurity, including fraudulent digital activities related to recruitment. In early 2025, amendments to PECA sparked renewed controversy by tightening rules on information sharing online, paving the way for increased cyber-policing under the pretext of combating fake news and cybercrime. The new

²³ Anjum, Shakeel. 'FIA, Interpol Join Forces to Crack down on Human Trafficking Networks'. The News International, 25 January 2025. <https://www.thenews.com.pk/print/1275799-fia-interpol-join-forces-to-crack-down-on-human-trafficking-networks>.

Section 26(A) defines fake news as information that a person “knows or has reason to believe to be false or fake and likely to cause or create a sense of fear, panic or disorder or unrest,” declaring its online dissemination a non-bailable, non-compoundable, and cognisable offence. Critics argue that the vague definition of offences could be used to suppress dissent and penalise online activity deemed “anti-state.”²⁴

Table 3: Selected clauses from cybercrime related laws.

Document	Section	Relevance
PECA (2016)	Section 11	Criminalises electronic forgery, defined as interference with or misuse of any information system, device or data with the intent to cause damage or commit fraud (among other misuses)
	Section 12	Criminalises electronic fraud defined as usage of information system, device or data with the intent to deceive or cause harm
	Section 14	Criminalises unauthorised use of identity information
	Section 22	Penalises spamming, defined as transmission of harmful, fraudulent, misleading, illegal or unsolicited information
	Section 23	Penalises spoofing, defined as information provided with counterfeit source intended to be believed by the recipient as authentic.
The Removal Blocking of Unlawful Online Content Rules (2021)	Chapter 1, Rule 2	Defines the scope of the Rules largely related to removing and/or blocking of unlawful digital content
	Chapter 3	Focuses on filing, processing, and disposal of complaints and ancillary procedures
	Chapter 4	Focuses on oversight mechanism, including defining the responsibilities for social media providers in line with local laws
	Chapter 5	Focuses on review of applications and appeal process
Citizens Protection [Against Online Harm] Rules 2020	Chapter 3, Rule 4	Obligations on social media companies on blocking and removal of unlawful online content
	Rule 6	Provision of information by social media
	Rule 7	Blocking of online system
	Chapter 4	Filing of complaints and its disposal

The institutional architecture for cybercrime regulation in Pakistan involves three main players: the **Pakistan Telecommunication Authority (PTA)** under the Ministry of Information Technology and Telecommunication, the **National Cyber Crime Investigation Agency (NCCIA)** under the Ministry of Interior, and **Pakistan’s National Computer Emergency Response Team (PKCERT)**. Established under the Pakistan Telecommunication (Re-Organisation) Act 1996, the PTA is responsible for establishing, operating, and maintaining telecommunication systems and services. It also enforces PECA, regulates and blocks online content in collaboration with social media companies, and monitors Pakistan’s cyberspace.

While the PTA focuses primarily on digital regulation and content management, the FIA remains the principal agency investigating cybercrime offences and taking legal action against perpetrators. Until recently, the **FIA’s Cyber Crime Wing** handled law enforcement related to cybercrime under the FIA Act 1974 (updated 2023) and PECA 2016. Structured into six geographical zones and 15 Cybercrime Reporting Centres (CCRCs), each with investigators, prosecutors, analysts, law officers, forensic experts, and support staff, the Wing used digital forensics, technical investigations, security audits, penetration testing, and training to oversee major cybercrimes including financial fraud, harassment, hacking, cyberbullying, stalking, and child pornography.

²⁴ Khan, Eesha Arshad. ‘The Prevention of Electronic Crimes Act 2016: An Analysis’. LUMS Shaikh Ahmad Hassan School of Law, 2018. <https://sahsol.lums.edu.pk/node/12862>.

In May 2025, in response to rising cybercrime threats, the government replaced the FIA's Cyber Crime Wing with the **National Cyber Crime Investigation Agency (NCCIA)**, an independent authority under the Ministry of Interior. The NCCIA has full authority to prevent, investigate, and act against cybercrime nationwide, including online fraudulent job advertisements and financial fraud linked to irregular migration, smuggling, and trafficking. This represents a significant shift in Pakistan's approach to digital security and online law enforcement. However, as a newly established agency, its functions and achievements are yet to be fully evaluated.

PKCERT plays a crucial role in safeguarding Pakistan's cyberspace by detecting, preventing and responding to cyber threats, minimising incident impacts, building incident management capacity and developing advanced security services. It also contributes to policy and regulation formulation, forensic and malware analysis, vulnerability assessments, and product evaluation.

The 2025 PECA amendments – which established the NCCIA – also created the **Social Media Protection and Regulatory Authority** and **Social Media Protection Tribunals**. To date, only the NCCIA is operational, serving as the sole agency responsible for investigating cybercrime through a dedicated forensic analysis laboratory, the reports of which are admissible in court.²⁵

In terms of policy, the Ministry of Information Technology and Telecommunications launched the **National Cyber Security Policy** in 2021 to secure Pakistan's cyberspace and improve its digital ecosystem. While a positive step, the policy focuses more on information systems security than protection against cybercrime targeting individuals. Its cybercrime response mechanism is broad, lacking specific action points or clear responsibility lines.

Additionally, the FIA's 2021 **Cybercrime Risks, Prevention, and Legal Remedies: Guidelines for Cyber Users** serves as an informational tool for digital users on common cybercrimes, fraudulent digital activities, and avoidance strategies. It addresses tactics used by fraudulent agents, including fake job offers under financial crimes, but does not connect these to irregular migration.

Overall, Pakistan's digital landscape is shaped by government-imposed restrictions and whitelisting practices. While intended to curb harmful or subversive content, these measures often have unintended consequences. Whitelists restricting access to only approved websites can limit vital information and services, hindering economic development and educational opportunities. Overly broad restrictions may stifle free speech and diverse perspectives, affecting individual liberties and the information flow essential for a thriving digital economy. Balancing national security with open access remains a critical challenge requiring transparency, accountability, and proportionality in internet governance. The lack of clear guidelines and appeal mechanisms for website blocking exacerbates the issue.

Pakistan's digital security landscape is further complicated by limited infrastructure, uneven national coverage, and widespread lack of awareness about basic digital security practices such as strong password creation, phishing recognition, and software updates. The evolving legal framework for data

²⁵ Adil, Kamran. '2025 Amendments to The Prevention of Electronic Crimes Act, 2016: An Introduction'. Research Society of International Law, 25 February 2025. <https://rsilpak.org/2025/2025-amendments-to-the-prevention-of-electronic-crimes-act-2016-an-introduction/>.

privacy, coupled with the absence of comprehensive data protection laws, leaves personal information vulnerable to misuse and exploitation.

3. Research design and challenges

This report is based on three main research strands – desk research, social media analysis, and key informant interviews – which enabled the researchers to analyse the types and standard elements of fake job advertisements in the Pakistani context, their underlying reasons, and their criminal purposes. Through the wider assessment, the report aims to support Pakistani law enforcement responses in this area, by identifying key priorities for further work and cooperation.

The desk research serves three purposes: i) to outline the current state of play in countering fraudulent online job advertisements and related cyber activities facilitating irregular migration; ii) to analyse national policy frameworks on overseas migration, smuggling, trafficking, and cybercrime; and iii) to provide a contextual overview of current trends, patterns, and modus operandi of fraudulent agents targeting potential migrants.

For the social media analysis, popular social media applications (particularly Facebook, Instagram, TikTok, and YouTube), messaging and call applications (WhatsApp and Telegram), and commercial classified websites (such as OLX, jobs.pk, rozee.com) were examined to identify job advertisements exhibiting red flags regarding their authenticity. While the advertisements and posts analysed do not constitute a representative sample of potentially fake job offers targeting Pakistani jobseekers, they provide a valuable snapshot of common features and trends in how online job advertisements are used to perpetrate scams or exploitation.

The fieldwork phase, conducted between March and April 2025, involved in-person and online consultations with 24 relevant stakeholders, including governmental authorities, law enforcement agencies (LEAs), employment promoters, telecommunication companies, international organisations, and civil society organisations. Discussions focused on three main areas: i) current trends and patterns in fraudulent online job advertisements related to irregular migration and/or trafficking, as well as the modus operandi of fraudulent online agents and criminal groups; ii) the effectiveness of existing legal and institutional frameworks in addressing fraudulent recruitment leading to irregular migration and/or trafficking; and iii) current standard operating procedures, capacities, and cooperation mechanisms, along with potential gaps and challenges.

The organisation of the fieldwork and analysis of empirical results presented some ethical and practical challenges. First, the research involved sensitive information that could not be captured or shared during stakeholder consultations without disrupting or harming their work; accordingly, all necessary precautions were taken to ensure stakeholder confidentiality and the appropriate dissemination of information. Second, even among relevant stakeholders, smuggling and trafficking are often conflated, limiting the overall understanding of the problem and the ability to assess the specific relevance of cybercrime to each phenomenon. Third, the fieldwork coincided with Ramadan, which partially limited stakeholder availability and consultation times; consequently, in-person meetings were typically scheduled in the morning, while online consultations took place after Ramadan. Finally, due to time constraints and ethical concerns, no interviews were conducted with victims of fraudulent job advertisements. While this limits the scope of the current assessment, it provides a foundation for future victim-centred research.

As part of the broader assessment, a focused analytical strand applied the Business Model Canvas (BMC)²⁶ to examine the operational structure of transnational fraud networks, particularly those involving fake job offer schemes originating in Pakistan. Methodologically distinct, this component forms an integral part of the study, using a targeted framework to deconstruct the economic logic and organisational elements of these criminal operations. Drawing on expert interviews and desk research, the analysis maps key components such as revenue streams, target groups, communication channels, and risk mitigation strategies. The BMC offers a structured approach to understanding how these schemes function, adapt and evade enforcement. Key findings from this analysis are presented in the following chapter.

²⁶ Sogenbits, Thea, and Umut Turksen. 'Cracking the Code: Unveiling Carding Crime through the Darknet-Acquired Criminal Carding Manual and the Business Model Canvas'. *Journal of Economic Criminology* 5 (September 2024). <https://doi.org/10.1016/j.jeconc.2024.100071>.

4. Situational analysis: Cybercrime and migration

4.1 Landscape overview

The landscape of cybercrime in the context of migration encompasses both online recruitment fraud and the digital components of migrant smuggling and human trafficking. Although the precise scale of the problem is difficult to quantify – given that much of it goes unreported – the characteristics of Pakistan’s emigration landscape suggest a more widespread phenomenon. These criminal activities exploit the aspirations of individuals seeking better employment opportunities abroad, capitalising on widespread unemployment, the desire for economic advancement, and, in some cases, societal or familial pressure to achieve a higher standard of living. The dissemination of broadband services, with more than 142 million people having internet access even in remote areas of the country,²⁷ has led to growing use of social media platforms, facilitating online job seeking and connections with employment services. However, criminal groups also exploit this increased connectivity and internet usage to disseminate their messages online and lure people into fraudulent recruitment, resulting in a proliferation of cybercrimes targeting potential migrants.²⁸ Profiting from the often-unmet high demand for labour migration, perpetrators employ various tactics on digital platforms and messaging apps to deceive and defraud their victims, luring them with promises of overseas jobs, smuggling services, and fake emigration opportunities. Each of these crimes is distinct in its operations but can be interconnected, with fraudulent job offers serving as a gateway to both smuggling and trafficking activities.

Fraud

The most prevalent form of cybercrime related to migration identified in this research is fake online job and visa advertisements designed to defraud potential migrants. While many legitimate agencies support about 800,000 Pakistanis annually in their recruitment and outward migration processes, numerous unlicensed or illegal operators engage in abusive, unlawful, or deceitful practices.²⁹ Fake online advertisements deliberately mimic both legitimate and illegitimate recruitment practices to deceive jobseekers. According to the BEOE, as of March 2026, a total of 5,199 OEP licences were registered in Pakistan, of which 2,672 were active, while 888 had been cancelled, 777 expired, 836 surrendered, and 26 invalid or suspended.³⁰ Although the BEOE continuously verifies these licences to protect jobseekers from scams and fraudulent organisations, fake and compromised agents operate alongside them to defraud potential labour migrants. In some cases, the distinction between fake and real agents is blurred by the informal operations of legitimate OEPs. Despite being legally prohibited, it is common practice for some OEPs to conduct outreach in rural and remote areas through unregistered and unregulated sub-agents.³¹

²⁷ Pakistan Telecommunication Authority. PTA Annual Report 2024. Pakistan Telecommunication Authority, 2024.

²⁸ Hussain, Ejaz, and Kashif Akram Noon. Connectivity and Criminality: Relationship between Trafficking and Trade Infrastructure. National Initiative against Organized Crime, 2021.

²⁹ UNODC. The Role of Recruitment Fees and Abusive and Fraudulent Recruitment Practices of Recruitment Agencies in Trafficking in Persons. United Nations Office on Drugs and Crime, 2015.

³⁰ BEOE. ‘List of Overseas Employment Promoters (OEPs)’. Government of Pakistan - Bureau of Emigration and Overseas Employment, 2026. <https://beoe.gov.pk/list-of-oeps?show=active>.

³¹ U.S. Department of State. ‘2024 Trafficking in Persons Report: Pakistan’.

The job openings posted by fraudulent agents online appear legitimate, often replicating authentic job postings from established organisations abroad and offering attractive salaries and benefits in desirable locations such as GCC countries, EU Member States, and Southeast Asia (a more detailed overview of such advertisements is provided in Chapter 5.2). These advertisements typically appear on popular social media platforms such as Facebook, WhatsApp, Instagram, TikTok, and Telegram, targeting young, low-income, unskilled or semi-skilled workers – particularly in construction, hospitality, and domestic sectors – although cases targeting educated individuals have also been identified. These offers are frequently packaged with promises of a Western lifestyle, complete with social benefits and economic stability, creating a compelling – but entirely false – sense of opportunity and hope.

The primary objective of these online fraudulent job advertisements is to extract as much money as possible from victims before they realise they have been scammed. These schemes generate substantial profits with minimal upfront investment, low risk, and limited chances of detection, making them highly lucrative for fraudsters. Once victims express interest, they are typically asked to provide their CV and personal information, including identification documents and photographs. In some instances, no CV is even required, and victims may receive an offer letter within hours of responding, purportedly based on their job profile. Having been led to believe they have secured employment, victims are then instructed to pay standard processing fees for services such as medical examinations, visa stamping or documentation – charges typical of legitimate processes. If the scam continues, victims may receive fake visa stamps and flight tickets before discovering that no job exists or that the documentation is fraudulent.

As previous research has demonstrated,³² criminal groups involved in these activities typically comprise small-scale networks of loosely connected agents, whose coordination varies according to the type and scale of operations. While some fraudsters disappear after receiving initial payments, others prolong the scam by requesting multiple payments for various services until victims recognise the deception. As the duration of the scam increases, so does the number of individuals involved – for example, in producing fabricated medical certificates or fake visa stickers. This requires greater coordination among participants, enhanced organisational capacity to manage different aspects of the operation, and higher operational costs to sustain the network.

Communication and document exchanges between fraudulent agents and victims typically occur via text messaging, with no physical interaction beyond the online environment. This allows perpetrators to remain anonymous and easily block victims on social media once the scam is exposed. Social media platforms and messaging apps are also used by fraudulent agents to coordinate operations and receive payments, exploiting the fact that LEAs rarely investigate minor scams. Stakeholder consultations revealed that a common recent strategy involves requesting relatively small sums for each administrative service or procedure, thereby minimising victim suspicion and reducing detection risk. Some criminal groups exploit digital payment methods – including dormant or fake accounts and mobile banking services offered by telecom companies – to collect funds, as these enable greater anonymity and eliminate the need for in-person transactions.

³² See also Aksel et al., 'Study on Smuggling of Migrants'.

Smuggling

In addition to fraudulent agents promoting fake job advertisements to defraud individuals, some criminal networks also use digital platforms to advertise irregular migration routes or smuggling services – although in these cases they typically offer short-term visas or smuggling services rather than employment opportunities. Often referred to as “the game” or, more locally, as “*dunki/dunky*,” these smuggling services falsely promise safe and quick routes to popular destinations in Europe or Southeast Asia. Such operations are much more lucrative for criminal groups than simple fraud but pose extreme risks to migrants. While individuals may initially participate willingly in these irregular migration schemes, some later find themselves trapped in exploitative or dangerous conditions, or become victims of violence, deception, or human rights abuses.

In this context, online advertisements for smuggling services may occasionally mention potential job opportunities, although this is not standard practice. At the initial stage, smuggling agents offer to organise migration using regular migration opportunities to transit countries via visit, business, or religious visas. Until recently, land routes via Iran and Türkiye, and air routes to Libya and Egypt, were the most popular among Pakistani migrants,³³ who would travel there before boarding small boats to cross irregularly into European territory. Other destinations include Southeast Asian countries as transit points for irregular migration to Australia, and, to a lesser extent, Central Asian countries and the Russian Federation as transit routes to Europe.³⁴ The regular presence in transit countries is governed by visa duration, creating the risk of migrants becoming irregular through visa overstays or unauthorised employment (prohibited under the terms of such visas).

The boat tragedy off the Greek town of Pylos in June 2023, where hundreds of Pakistani migrants lost their lives, not only prompted strengthened border controls between Pakistan and Iran to reduce irregular migration but also – as revealed in interviews – led smuggling networks and potential migrants to recognise the high risks and costs of the European route. Although the EU remains attractive for its earning potential and the prospect of elevated social status within communities of origin, smuggling destinations appear to have shifted recently, with GCC countries – particularly routes to or via Saudi Arabia, accessible through pilgrimage visas – and Southeast Asian countries gaining popularity.

The criminal groups promoting smuggling services typically form part of larger, sophisticated transnational networks operating through cross-border connections rather than rigid hierarchies. Previous research demonstrated how smuggling networks function as well-oiled chains, with leaders coordinating activities and payments, middlemen organising transportation or communication via personal contacts, and facilitators directly handling migrant smuggling.³⁵ The horizontal, flexible nature of these networks makes them highly adaptable to policy changes and ground conditions, as well as easily replaceable if exposed.³⁶

³³ Inam, Zunaira. ‘Perilous Journeys.’

³⁴ UNODC. Global Study on Smuggling of Migrants 2018. United Nations Office on Drugs and Crime, 2018.

³⁵ Coyne, John, and Madeleine Nyst. People Smugglers Globally, 2017. Australian Strategic Policy Institute, 2017; Aksel et al., ‘Study on Smuggling of Migrants’.

³⁶ UNODC. ‘Global Study on Smuggling of Migrants 2018.’

These agents often originate from the same communities as potential migrants, building trust and credibility through personal connections. As Coyne and Nyst note, unlike other criminal activities such as human trafficking or goods smuggling, trust is essential not only to establish client relationships but also to enhance the smuggler's reputation.³⁷ Some agents act as intermediaries operating from within Pakistan, while others collaborate with counterparts in destination countries such as Malaysia, the UAE, or the EU. Foreign-based agents may leverage local knowledge, including cultural or linguistic ties, to enhance legitimacy. Their roles range from providing practical support and facilitating payments to actively assisting in cross-border smuggling.

Payment methods also differ from those used in simple fraud operations. While digital payments enable cross-border money movement and service mobilisation – often through complex transactions and shell companies to obscure fund origins – informal systems like Hawala and Hundi networks are commonly used for discreet transfers and to build victim trust, allowing deferred payments upon successful arrival at destination.³⁸ However, the closer perpetrator-victim relationship may also lead to cash payments, particularly for local services, leaving no transaction trace.

Like fake job advertisements, the primary target group for online smuggling recruitment comprises vulnerable, low-skilled, low-educated young men desperate to escape economic hardship and seek opportunities abroad. However, while jobseekers come from across the country, smuggling networks primarily draw from rural districts in Punjab and Khyber Pakhtunkhwa, which have long histories of both regular and irregular migration.³⁹

Trafficking

Less common, yet more problematic, is the case in which fraudulent agents traffic jobseekers to other countries for the purpose of labour or sexual exploitation. In such cases, victims are deceived into believing they have secured legitimate employment but, once abroad, may find themselves trapped in labour exploitation, cybercrime activities (such as working in scam call centres) or sexual exploitation.⁴⁰ Research has also shown that migrants seeking employment in GCC countries might be forced to smuggle prohibited drugs there, thereby risking being sentenced to death and executed.⁴¹

Furthermore, the implementation of the non-punishment principle for victims of trafficking who are compelled to commit crimes is often highly challenging for the authorities, and victims may sometimes be prosecuted and sentenced as offenders. In other cases, debt bondage becomes a key mechanism through which traffickers maintain control over victims. Some jobseekers incur substantial debts to pay for the services of fraudulent agencies, often mortgaging assets, drawing on family resources, or

³⁷ Coyne and Nyst. 'People Smugglers Globally, 2017'; Inam, 'Perilous Journeys'.

³⁸ Aksel et al., 'Study on Smuggling of Migrants'; Coyne and Nyst. 'People Smugglers Globally, 2017'.

³⁹ See also Hussain and Noon, 'Connectivity and Criminality'; Murray, Fraser, Sananthi Themnimulle, Nida Mustaq, and Shehryar Fazli. *Modern Slavery in Pakistan*. Development Alternatives Inc., 2020.

⁴⁰ NCHRP. *The Menace of Human Trafficking/Smuggling. Pakistan's Response to the Problem*. National Commission for Human Rights Pakistan, 2018; UNODC and GLO-ACT. *Pakistan's Gender-Sensitive and Human Rights-Based Response to Trafficking in Persons and Smuggling of Migrants*. United Nations Office on Drugs and Crime - Country Office Pakistan, 2021; U.S. Department of State. '2024 Trafficking in Persons Report: Pakistan'.

⁴¹ JPP and Equidem. *Through the Cracks: The Exploitation of Pakistani Migrant Workers in the Gulf Recruitment Regime*. Justice Project Pakistan, 2019.

taking out extortionate loans from criminal groups – sometimes linked to the same recruitment agencies – thus increasing their vulnerability to exploitation and coercion.⁴²

Regarding routes and destinations, until a few years ago, land routes to the Middle East and air routes to GCC countries and Türkiye were the most commonly used.⁴³ However, according to consultations with different stakeholders, Southeast Asia has recently emerged as a key destination for trafficking victims, particularly following increased surveillance of and restricted access to smuggling routes to Europe. Thailand, Malaysia, Cambodia, Myanmar, and Vietnam are among the most common destinations, often due to more accessible visa requirements for Pakistani nationals.

Criminal groups involved in these schemes “can take various forms and shapes, running the gamut from one individual recruiter or loose networks of intermediaries to small or mid-size agencies, or multinational enterprises with global operations.”⁴⁴ Some networks are built around family ties or community relationships, making them harder to detect due to the trust victims place in recruiters. These recruiters may already be connected to or embedded within criminal networks operating from transit or destination hubs, often engaged in multiple criminal activities, including fraud, smuggling, and extortion.

Recruiters make extensive use of online platforms, including Facebook, YouTube, and TikTok, to advertise job opportunities, often portraying life abroad in a misleadingly glamorous manner. Telegram and encrypted messaging apps such as WhatsApp are commonly used to communicate with potential victims and coordinate recruitment and financial transactions, allowing for greater anonymity and untraceability. Payments linked to these operations often begin with bank transactions but are subsequently moved through multiple accounts and converted into cryptocurrency to obscure money trails and avoid detection.

As with fraudulent recruitment and smuggling operations, the primary targets of trafficking schemes are economically vulnerable young jobseekers from across Pakistan, particularly from migration-prone districts in Punjab and KP,⁴⁵ and, in some cases, Sindh.⁴⁶ Once victims express interest, they contact the recruiter, who manages document collection and travel arrangements upon receipt of payment. Upon arrival in the destination country – often on a tourist visa – victims are received by other criminal agents, who typically confiscate their documents and force them into labour or sexual exploitation.

Unlike in smuggling and fraudulent recruitment schemes, women are increasingly being targeted, particularly through fake job offers in beauty salons or domestic work that conceal intentions of sexual or labour exploitation in GCC countries and Southeast Asia.⁴⁷ Women are also used as intermediaries by traffickers to recruit new victims, as the presence of a female recruiter tends to increase trust.

⁴² UNODC. *The Role of Recruitment Fees and Abusive and Fraudulent Recruitment Practices of Recruitment Agencies in Trafficking in Persons*. United Nations Office on Drugs and Crime, 2015.

⁴³ Murray, Fraser et al. ‘Modern Slavery in Pakistan’; see also UNODC Pakistan. *Recent Trends of Human Trafficking and Migrant Smuggling to and from Pakistan*. United Nations Office on Drugs and Crime - Country Office Pakistan, 2013.

⁴⁴ UNODC. ‘The Role of Recruitment Fees and Abusive and Fraudulent Recruitment Practices of Recruitment Agencies in Trafficking in Persons’.

⁴⁵ NCHRP. ‘The Menace of Human Trafficking/Smuggling. Pakistan’s Response to the Problem’.

⁴⁶ Murray, Fraser et al. ‘Modern Slavery in Pakistan’.

⁴⁷ UNODC and GLO-ACT. ‘Pakistan’s Gender-Sensitive and Human Rights-Based Response to Trafficking in Persons and Smuggling of Migrants’.

While Pakistani migrants are increasingly victims of trafficking, these operations often extend across South Asia more broadly, involving Bangladeshi, Sri Lankan, Nepali, and Indian nationals. Some stakeholders also suggest that a growing number of educated individuals and skilled professionals are being targeted. Key destination countries include Thailand (also a major trafficking hub), Cambodia, Laos, and Myanmar. The transnational scope and growing sophistication of trafficking operations make them particularly difficult to address effectively.

4.2 Focus on fake job advertisements

Scam recruitment schemes are widespread online, targeting individuals seeking employment opportunities outside of Pakistan. As noted above, these schemes are often linked to criminal activities such as fraud and human trafficking.

Two prominent trends observed in online content are:

- Advertisements for fake jobs (which may be linked to fraud or, in some cases, trafficking);
- Advertisements for migration services (which may be linked to migrant smuggling or fraud).

As discussed earlier, these advertisements are often designed to defraud individuals by promoting opportunities that may not exist, are illegitimate, or are deliberately misleading. While some may be connected to labour exploitation and/or human trafficking, it is difficult to conclusively establish this based solely on the advertisement. Common features raising concerns about the authenticity of online job postings include a lack of credible and verifiable information about the hiring company or the job, a sense of urgency in application, missing or unclear deadlines for procedure and departure, minimal or no qualification requirements, and a stronger emphasis on benefits than on job requirements.

A more detailed account of the advertisements and the modus operandi of these recruiters/agents is provided below:

Format of advertisements: The format of (fake) job advertisements varies across platforms. In general, three main formats can be identified: i) photo images (common across all platforms); ii) videos (common on TikTok, Instagram, and YouTube); and iii) text-based posts (common on Facebook, WhatsApp, and Telegram).

Photo images are the most common format. These often use stock images of city skylines, popular landmarks in destination countries, flags, or generic images of workers. They typically include information on the destination country, occupation, requirements (if any), benefits, and a contact phone number. In some cases, an email address or website is also provided. While many posts are in English, some include information in Urdu. It is also common to see images of stamped passports (with purported work permits) and professional-looking job contracts as “proof” of an advertiser’s success rate. Another common type of image-based advertisement, particularly on classified websites, consists of newspaper clippings, usually in Urdu.

Videos (often in the form of reels) are commonly found on TikTok, Instagram, and YouTube. Their style varies: some are impersonal, using digital backgrounds with overlaid text and music (similar to image-based ads), while others feature agents or advertisers presenting job opportunities or sharing “success stories” of applicants. The latter format is more frequently used to promote migration facilitation services rather than specific job vacancies.

Text-based advertisements are common on Facebook (including Messenger) and WhatsApp. These typically provide very limited information, often only mentioning that jobs or work permits are available in a particular country and inviting interested individuals to make direct contact for further details.

Information provided: A key indicator of potential fraud is the absence of specific and verifiable information about the hiring company. Many advertisements omit details such as the company's name, address, contact information, department, or official website. Instead, they vaguely refer to "work permits," "job contracts," or generic job titles, without including a proper job description. This lack of transparency is a significant red flag. Where job requirements are mentioned, they are often minimal, requiring little to no formal qualifications or certifications. Some advertisements specify only an age range, while others may mention basic educational attainment (e.g., FA/FSc, equivalent to grade 12), English language skills, or, in some cases, request a video demonstrating a specific task (for skilled roles). However, the emphasis is typically placed on the absence of requirements (e.g., no interview, no IELTS, no prior experience), portraying the opportunity as easily attainable and the process as quick and straightforward.

The primary focus of these advertisements is usually on the benefits offered, such as salary, overtime pay, and additional amenities (e.g., food, accommodation, airfare, medical insurance). Salaries advertised are often higher than industry averages in the destination country, especially given the low qualification thresholds presented.

Applicants are usually instructed to contact the agent or consultant directly for further information. In most cases, the only contact detail provided is a phone number, often with a request to communicate via WhatsApp. Occasionally, an email address or office address of the agent is included, but not of the hiring company. Advertisements rarely include the names of responsible individuals. Email addresses are typically hosted on generic domains (e.g., Gmail, LiveMail) rather than professional company domains, unlike legitimate job postings which generally provide verifiable corporate contact details.

A sense of urgency is a common feature across most advertisements, with phrases such as "urgently needed," "urgent apply," or "urgent departure," often without specifying concrete deadlines. This is another strong indicator of potential fraud. Expressions such as "done base visa" or "reach base visa"⁴⁸ are also frequently used by fraudulent agents to imply guaranteed visa approval, even when applicants lack complete documentation. In practice, such schemes often involve fraudulent documents, fake job offers, or the misuse of tourist visas for employment purposes (see Box 5 below). Numerous counter-videos by legitimate recruiters, agents, or content creators seek to expose these practices and warn potential applicants.

Finally, the analysis of sentence structure, font style, grammar, and other textual elements can also provide clues about an advertisement's legitimacy. In many questionable cases, inconsistencies in

⁴⁸ Both denominations loosely reflect guaranteed visas. Advertising a visa as "done base visa" is inherently fraudulent, as no agent can legitimately guarantee visa approval. The term is commonly used to attract applicants who may not meet visa or work permit eligibility requirements and who rely on agents to fabricate or supplement missing documentation. Reputable and licensed agents do not advertise guaranteed visas.

formatting, irregular use of uppercase and lowercase letters, grammatical errors, and spelling mistakes are common.

Box 5: Characteristics of done base visas.

Done base visas: A done base visa is a visa scam used by fraudulent agents to advertise “guaranteed” work permits or visa approvals for people seeking overseas employment, particularly targeting those who may not meet standard visa eligibility requirements due to incomplete documentation. In essence, this scheme may function either as visa fraud or as a form of migrant smuggling.

Common characteristics and modus operandi are as follows:

- **Documents:** For done base visas, agents usually ask applicants for basic documents (such as a passport and CV) and state that they will provide the remaining documents needed for the application at a later stage, including the medical certificate, skills certificate, application forms, work contract, bank statements, police certificate, and so on. This already implies the use of fake documents in the process, for example, obtaining a medical certificate without an examination, securing a skills certificate for skills the applicant does not possess, producing work contracts for jobs the applicant did not apply for, or printing bank statements that reflect artificially high savings. Sometimes, agents request additional documents at different stages and provide updates on the process, giving the impression that the case is progressing.
- **Fees:** Many done base visa schemes are marketed as “payment on delivery,” meaning applicants pay only once the visa has been issued. In other cases, agents charge in instalments, requesting a small amount in advance and the remainder upon receipt of the visa. Splitting the fee into instalments or waiving embassy application fees are common ways of building trust. Payments are often made via mobile wallets such as EasyPaisa or JazzCash, or in cash. Some estimates shared on social media suggest that the cost of a done base visa ranges from EUR 35,000 to 60,000.
- **Destinations:** Frequently advertised destinations include EU countries, the UK, Türkiye, Canada, the USA, Russia, the Maldives, and Malaysia. Countries that do not require an interview for visa processing are often the ones promoted.
- **Timeline:** Agents request additional documents at specific intervals and provide progress updates, eventually giving a date on which the visa or work permit will supposedly be received.
- **Process:** On the promised date, agents issue what appears to be an official but fake “stamped” work permit, including the contract, salary, and benefits, even when the applicant has not applied for a specific job, and then request the next instalment payment. After receiving payment, agents tell applicants to apply for the visa through the embassy; alternatively, they may offer to submit the application on the applicant’s behalf, using the fee paid by the applicant for this purpose, which is often minimal compared with the amount charged. Applicants attend the embassy appointment and submit their documents. While visas are approved in very rare cases, most applicants receive a rejection stamp in their passport. In such cases, the agents blame the embassy and point to the few approved cases as evidence of legitimacy. Sometimes they return part of the money, often in instalments and after delay, while retaining non-refundable charges.

Call for action and engagement: A common feature across online job advertisements on all platforms and in all formats (image, video, text-based) is the requirement to contact the advertiser via direct message or WhatsApp for more information about the job itself. Unlike legitimate advertisements, where all necessary information is already included in the job post, fraudulent advertisements that mention a website for the OEP or job poster ultimately redirect users to the agents’ phone number, where they are expected to communicate one to one for more specific details about the opportunity.

Interestingly, in some Facebook and WhatsApp group chats, as well as in comments section on Instagram, Facebook, and TikTok, links to Telegram chats are also shared. These appear to be related to cryptocurrency trading or scam forex trading.

In terms of comments and engagement, the most common responses are “I am interested” or “price,” after which commenters are invited to contact the advertiser directly via direct message or WhatsApp using the number provided. Engagement with TikTok videos appears to be the strongest, with some videos attracting hundreds of comments, thousands of likes, and multiple shares, reflecting the wide reach of these posts. Under content promoting *azad* (freelance/independent) visas for GCC countries and done or reach base visas for Europe or other destinations, many users describe the content as “informative,” while numerous others identify these schemes as fraudulent or fake.

While it is difficult to say with certainty whether a particular job advertisement is fraudulent or would lead to trafficking, several signs may indicate the type of crime it is related to. For instance, advertisements for done or reach base visas are classic examples of fraud, as the agent initially convinces the interested individual that reaching the desired destination is guaranteed. Although most advertisements of this kind claim that payment is due only at the end of the process, in reality, as seen in Box 5 above, some payment is often extracted during the process, usually in instalments.

With respect to trafficking, warning signs include advertisements aimed specifically at women for certain positions, such as personal secretary, executive assistant, receptionist, housekeeping, beautician, or cabin crew, often in East Asia. Jobs targeting female applicants sometimes require them to be “good looking,” “smart,” and within a younger age range. Of course, these are not the only indicators, and it is difficult to predict whether a particular advertisement is merely designed to extort money or may actually lead to exploitation and trafficking. For example, offers that seem too good to be true, require little experience or qualification, and promise high salaries and numerous amenities may indicate trafficking. Other factors, such as the absence of verifiable company information, unprofessional email addresses from people claiming to represent the hiring company, or pressure to respond immediately, also suggest exploitative elements, whether related to trafficking or fraud.

While beyond the scope of this analysis, indications of smuggling can also be identified in social media content. For instance, the use of phrases such as “dunki/dunky” or “the game” is commonly observed in TikTok reels targeting Pakistanis and other South Asian nationals, including Indians, Bangladeshis, and Nepalis. These advertisements are directed at individuals already in GCC countries or North Africa. “The game” was promoted as a route from Libya to Greece or Italy, from Morocco to Spain, and from Western Balkan countries to Italy and Spain.

Fraud, smuggling, or trafficking?

Box 6: Example of online advertisement promoting job opportunities in Southeast Asia.

- **Characteristics:** An emerging trend related to online advertisements promoting job opportunities has been targeting Pakistani workers seeking employment in Southeast Asia, in particular in Malaysia, Thailand, Myanmar, and Cambodia. Many migrants are unaware of the legal implications and are deceived through misleading recruitment practices, which can lead to labour exploitation. The main characteristics of this scheme are as follows:
- **Profile of criminal groups:** Well-organised recruitment networks operate across Pakistan and Southeast Asia, often rooted in local communities. Agents frequently collaborate, with some holding long-term residence in countries of destination through marriage. Operations rely heavily on digital platforms such

as Facebook, WhatsApp, and TikTok to advertise jobs and lure victims. The structure of these networks is opaque, with many victims unaware of who handles their documents and money.

- **Profile of target groups:** The primary targets are low-educated, low-income individuals, mainly from Punjab and KP. Many lack formal education and rely on agents from their own communities, which fosters trust and makes them more vulnerable to deception.
- **Procedure and fees:** Agents promise jobs with minimal details and requirements, usually in the construction, service, or agricultural sectors. They also organise travel arrangements, collecting passports and demanding fees of approx. 60,000–120,000 PKR (approx. €180-360), often sourced from the victim’s family. Migrants typically receive a visit visa instead of a work visa, unknowingly entering the country without legal work authorisation. Upon arrival, migrants are given a local contact and begin working informally, running the risk of being fined or even detained.

The examples of done base visas (Box 5) and online advertisements for employment opportunities in Southeast Asia (Box 6) illustrate not only the many transnational criminal operations connected to online job advertisements and irregular migration, but also the difficulty in identifying the type of criminal activity, especially from the perspective of the individual country of origin.

As discussed in section 3.2, while fraudulent, smuggling, and trafficking activities can be easily distinguishable in theory, their identification in practice proves more challenging, particularly until the entire migration process concludes. The examples above may lead to:

- **Fraud:** This occurs when the fraudulent agency defrauds potential migrants and disappears before the migration process, without effectively putting in place any travel arrangements. Even if the criminal network is well-structured and provides fake visa stickers, it does not aim to facilitate actual border crossing or ensure that migrants reach their destination.
- **Smuggling:** This emerges when the criminal group organises smuggling services and facilitates border crossing to enable migrants to reach their destination – without necessarily advertising job offers. This can involve deception, such as providing tourist visas and instructing migrants on what to tell border guards. Successful done base visas and online advertisements promoting services such as “the game” or “dunki/dunky” might qualify as smuggling.
- **Trafficking:** Trafficking involves not only coercion, abuse, or labour exploitation, but also deception regarding border crossing or the nature of activities in the country of destination. The former is often easier to identify, involving, for example, employment in jobs different from those advertised (e.g., prostitution or scam call centres), slavery-like working conditions (e.g., extended shifts, lower pay, no possibility of withdrawal), or ransom demands to families. The latter, however, is less straightforward. Deception may occur when migrants are unaware of the conditions of their border crossing or their irregular status in the destination country after visa expiration. The job opportunity in Box 6 might qualify as trafficking if migrants end up in exploitative jobs different from those advertised or are deceived about their visa’s purpose and duration.

To better identify and tackle these issues, individual efforts by countries of origin are insufficient. While online frauds do not necessarily extend across borders, smuggling and trafficking often do, and can only be understood once migrants reach their destination. Broader and stronger international cooperation is therefore essential to identify and prosecute transnational criminal activities and dismantle trafficking networks. Further research in destination countries is also needed to better understand the characteristics and extent of the problem.

4.3 Analysis of findings through the Business Model Canvas

Building upon the wider analysis of fraudulent job offer schemes emerging in Pakistan, this section introduces key findings derived from applying a Business Model Canvas (BMC) framework to these criminal enterprises.⁴⁹ While the BMC is conventionally used by legitimate organisations to visualise how value is created, delivered, and captured, it serves equally well as a diagnostic tool for mapping illicit business models, shedding light on their organisational structures, core resources, revenue streams, and operational tactics.

In this context, the BMC helps clarify how fraudulent employment schemes generate illicit profit, coordinate operations, target and deceive victims, and mitigate legal exposure. This introductory overview highlights the principal elements of the scam’s operational model. While the analysis in this chapter looks at the different characteristics of the three main criminal groups (fraudsters, smugglers, and traffickers) through the BMC lens, a more detailed analysis of the various agents involved (including victims) is provided in Annex 1.

A key aspect of this crime model is the **identification of illicit revenue streams** – often derived from advance fees, document charges, or bogus visa processing payments collected from unsuspecting victims. Moreover, this crime business model encompasses a range of **operational tactics** designed to evade detection and exploit regulatory gaps, including the use of fake corporate identities, forged documents, and transient digital platforms hosted across multiple jurisdictions.

Equally important is an examination of the **organisational structure** of such schemes. These crimes typically involve coordinated networks of recruiters, forgers, call centre operatives, IT support, and financial mules. Mapping the fake job offer crime business model also enables the **identification of critical nodes** – digital payment gateways, communication platforms, and cross-border collaborators – that serve as convergence points for illegal activity.

The BMC approach provides a comprehensive framework to visualise, analyse, and intervene in sophisticated fraud schemes. By understanding the structure and function of the fake job offer enterprise, law enforcement agencies can tackle such issues more efficiently, ultimately protecting vulnerable people.

To disclose and examine these key points, the BMC focuses on nine core aspects of the business model.

Value proposition refers to the unique benefit or solution that an organisation offers to meet the needs of its “customers.” It defines why customers choose a specific service or product over another, highlighting the value created through innovation, convenience, price, quality, or other factors. In the context of a criminal enterprise, the value proposition represents the perceived benefits that the scheme offers to its different “customers,” whether jobseekers or other actors who benefit from it. The value proposition can vary significantly across different customer segments. For victims, the “value” is a tragic illusion, created to exploit their vulnerabilities and aspirations. For other actors involved – whether complicit, coerced, or unwitting – the scheme offers perceived benefits that

⁴⁹ Sogenbits, Thea, and Umut Turksen. ‘Cracking the Code: Unveiling Carding Crime through the Darknet-Acquired Criminal Carding Manual and the Business Model Canvas’.

sustain the criminal enterprise. Importantly, these propositions reflect the fraudsters' perspective rather than actual or legitimate value provided.

Customer segments in fraudulent job offer schemes include various actors who benefit from or participate in the scheme. As in the smuggling literature, the term "customer" refers primarily to those seeking smuggling services or potential victims of trafficking – i.e., potential migrants looking for jobs abroad or ways to cross borders – who are targeted by fraudulent job offers or smuggling services advertisements. Though not customers in the traditional sense, fraudsters treat them as such, tailoring deceptive value propositions to exploit their economic vulnerability and desire for better opportunities abroad. These victims typically include unskilled workers, recent graduates, and individuals from low-income or rural areas. Fraudsters lure them with promises of high salaries, minimal requirements, fast processing, and relocation to desirable destinations, creating false hope while generating revenue. Recognising victims as a customer segment helps inform targeted prevention, disrupt scam operations, and support at-risk populations.

However, the "customer segment" category also encompasses those who knowingly or unknowingly benefit from the criminal activity. Rather than a single, clearly defined group, these schemes often involve networks of individuals and entities with overlapping roles and interests, who derive specific value – often illicit or unethical – from their role in the scheme. These are for instance:

- Fraudsters who gain significant financial returns with minimal investment and low perceived risk through scalable, automated, and anonymous operations, which allow them to exploit large numbers of victims while evading detection.
- Compromised or fake recruitment agencies that benefit through financial incentives such as bribes and profit-sharing, or by providing a veneer of legitimacy that lowers suspicion and facilitates fraud.
- Money launderers who use these schemes to legitimise and move illicit funds, capitalising on the flow of transactions and anonymity to reduce detection risk.
- Technology providers – whether complicit or unaware – who may profit indirectly through platform engagement, advertising revenue, or fees, especially when their services are used to promote fraudulent vacancies or coordinate scams.

Channels reveal the means through which the business delivers its value proposition to customer segments. In fraudulent schemes, these channels recruit victims, coordinate with accomplices, move funds, and sustain operations, often overlapping across different segments as networks adapt to remain effective and difficult to trace.

Customer relationships show how criminal networks interact with and manipulate targets. These relationships are fundamentally exploitative and deceptive, built on false promises and manipulation.

Revenue streams in fraudulent schemes arise indirectly, with different segments contributing to the overall financial gain. The primary revenue stream comes from victims, but other segments facilitate this process. Profit margins result from aggregating victim payments after operational costs and payments to supporting actors like money launderers and complicit agencies are deducted.

Key activities highlight the complex web of activities involved and the different roles played by various actors in perpetrating this crime. The strong reliance on fraudsters' infrastructure to effectively target jobseekers, for instance, clearly shows the interdependencies between activities and segments.

Resources clarify how assets are distributed and leveraged throughout the operation. The relationship between criminal groups and the resources at their disposal is fundamental, as fraudsters' success relies on online platforms (websites, social media, SMS, and WhatsApp) to target jobseekers and on Hawala/Hundi networks to launder their money.

Cost structure provides an overview of major investments, running costs, and other expenses incurred by different actors involved in the scheme. Notably, the full harm and costs to victims far exceeds fraudsters' profits.

As the previous analysis demonstrates, criminal groups involved in fraudulent schemes share similarities with those engaged in smuggling and trafficking operations, particularly in customer segments, communication channels, and customer relationships. However, the different nature of the crimes reveals stark differences in terms of key activities, partnerships, and cost structures. Employing the BMC framework, Table 4 below provides a detailed analysis of similarities and differences in the main trends and modus operandi of groups involved in fraudulent, smuggling, and trafficking activities. This BMC analysis of fraudulent job offers in Pakistan deconstructs their operational mechanisms, exposes their mechanics, and calls for more effective countermeasures.

Table 4: Elaboration of Business Model Canvas highlighting different modus operandi in relation to fraudulent, smuggling, and trafficking activities.

Business model indicators	Key points	Fraudsters	Smugglers	Traffickers
Value proposition	High financial returns	Yes	Yes	Yes
	Initial investment	Minimal	Minimal	Minimal
	Operational costs	Low	Medium/High	Medium/High
	Risk of detection	Low	Low	Low
	Scalable targeting and automation to reach large numbers of victims efficiently	Yes	Yes	Yes
	Operational anonymity	Yes	Yes, but potential initial contacts	Yes, but potential initial contacts
Customer segments	Type of customer targeted by criminal enterprise	Jobseekers and aspiring migrants	Aspiring migrants	Jobseekers and aspiring migrants
Channels	Unregistered or informal employment agents	Yes	Yes	Yes
	Advertisement channels	High reach platforms such as social media apps (Facebook, Instagram, TikTok, YouTube), classified websites	Word of mouth, social media (Facebook, Instagram, TikTok), online forums and chat rooms	Social media (Facebook, Instagram, TikTok), word of mouth recruitment
	Communication channels	WhatsApp, Telegram direct messages on social media apps, phone calls – Encrypted messaging apps, VPNs, and other tools to maintain anonymity	WhatsApp, Telegram direct messages on social media apps, phone calls – Encrypted messaging apps, VPNs, and other tools to maintain anonymity	WhatsApp, Telegram direct messages on social media apps, phone calls – Encrypted messaging apps, VPNs, and other tools to maintain anonymity
	Payment channels (Payment systems including mobile wallets, preferably compromised or mule operated bank accounts and informal money transfer systems like Hawala/Hundi)	Electronic transfers via Easypaisa and JazzCash, or cash, cryptocurrency exchange platforms (emerging mode)	Cash before service, Hawala/Hundi networks after migration	Cash, Hawala/Hundi
	Existing networks and communication channels of compromised recruitment agencies	Likely	Unlikely (to maintain their own reputation)	Likely
	Email addresses and phone numbers that are disposable or spoofed for communication	Yes	Yes	Yes
	Created or made-up websites, email addresses, and sometimes physical addresses for fake recruitment agencies	Yes	Yes	Yes
	Newspapers and magazines	Sometimes	Seldom	Sometimes
Customer relationships	Type of relationship	Mostly online	Online, but potential initial contact	Online, but potential contact during the process
	Length of relationship	As long as scam lasts	Depends on smuggling service offered	Until liberation or payment of ransom
	Characteristics of relationship	Transactional and deceptive	Transactional	Deceptive and exploitative

Revenue streams	Jobseekers and aspiring migrants are the primary revenue stream	<ul style="list-style-type: none"> • Upfront fees for application processing, training, visas, or other services • Security deposits as a guarantee for the job • Surcharge for travel and accommodation expenses, which are often never reimbursed • Purchase of equipment, software, or materials for the “job” 	<ul style="list-style-type: none"> • Payment broken down for migration phases or individual border segments. • Upfront fees for arranging documents (usually fake) • Payment for the kind of service (travel by road, by air, by sea) • Payment for travel and accommodation 	<ul style="list-style-type: none"> • Same initial revenue streams as fraudsters • Ongoing revenue streams from labour or sexual exploitation and/or one-time revenue for from ransom • Deductions from income • High service fee indebting victims for years
Key activities	Targeted advertising through online platforms, social media, and local networks (family/friends)	Yes	Yes	Yes
	Recruiting and managing a network of individuals to handle various aspects of the operation like advertising, communication, financial transactions, etc.	Depends	Depends	Yes
	Creating fake websites and documents developing convincing fake job postings, company websites, and supporting documents including offer letters and contracts etc.	Yes	Yes	Yes
	Building trust by establishing initial contact, engaging potential victims in conversations, and creating a facade of legitimacy	Build credibility through fake businesses	Maintain trust with migrants and collaborators	Maintain control through blackmail and manipulation
	Collecting payments and information and developing sophisticated ways to obtain funds from victims using hawala/hundi, mobile money and any personal information for identity theft	Yes	Yes	Yes
	Ghosting victims and cutting off communication after receiving payments or information	Yes	Communication continues until reaching destination	Communication and contact continue to exploit and abuse
	Developing and maintaining relevant infrastructure for fake websites and documents, managing communication channels, and ensuring secure transfer of funds.	Yes	Sometimes	Yes
Resources	Proficiency in website development, social media marketing, and potentially even coding	High	Medium	Medium
	Internal structure and hierarchy within the criminal organisation	Groups and individuals loosely connected, mostly local	More structured organisation but still loose, transnational network	More hierarchical transnational network
	Online platforms and social media to advertise fraudulent offers	Often	Sometimes	Often
	Websites and domains, including fake websites mimicking legitimate companies.	Often	Sometimes	Often

	Email addresses and phone numbers that are disposable or spoofed for communication	Yes	Yes	Yes
	Encrypted messaging apps, VPNs, and other tools to maintain anonymity	Often	Often	Often
	Data and personal information of victims gathered for identity theft or further fraud	Yes	Yes	Yes
	Shell companies with bank accounts for larger scale money laundering.	Depends on scale of operation	Often	Often
	Trust and reputation that can be misused or fabricated for deceiving victims.	Yes	Yes	Yes
	Money launderers for cleansed funds and anonymity in transactions	Yes	Yes	Yes
	Use of technology providers for secure and anonymous online infrastructure and means for communication	Yes	Yes	Yes
	For access to potential victims	Unwitting technology providers, compromised recruitment agencies and intermediaries	Community members, unwitting technology providers, compromised recruitment agencies and intermediaries	Unwitting technology providers, compromised recruitment agencies and intermediaries
	For transfer and exchange of money	Mobile cash apps, shell companies and banks that are necessary for layering and integrating illicit funds.	Hawala/hundi operators, Shell companies and banks that are necessary for layering and integrating illicit funds.	Hawala/hundi operators, Shell companies and banks that are necessary for layering and integrating illicit funds.
Cost structure	Operational costs	Lower logistical costs but higher technological costs for, e.g., website hosting, domain registration, VPNs, proxy servers, software for phishing, phone bills, and burner phones	Transport and accommodation costs, document forgery, phone bills, burner phones	Website hosting, domain registration, VPNs and proxy servers, software for phishing, fake documents, transport costs, phone bills, burner phones
	Recruitment costs	Salaries and payments to individuals involved in the scheme for scamming, advertising, communication, representation, recruitment	Salaries of sub-recruitment agents, other intermediaries	Salaries and payments to individuals involved in the scheme for scamming, advertising, communication, representation, recruitment
	Bribery and corruption	Bribes to overlook digital fraud trails	Payments to border guards, local law enforcement	Payments to border guards, digital fraud trails, local law enforcement



5. Key takeaways and next steps

The proliferation of fake job advertisements and the facilitation of irregular migration from Pakistan represent a growing threat to national security, economic stability, and the welfare of vulnerable populations. These transnational scams, often orchestrated through sophisticated networks posing as legitimate recruitment agencies, prey on the aspirations of jobseekers – particularly those from underprivileged or rural communities – by offering fraudulent employment opportunities abroad. The result is not only widespread financial exploitation but also the erosion of public trust in legal migration processes.

Law enforcement agencies in Pakistan are increasingly confronted with the complex and evolving nature of these crimes. However, the effectiveness of their response is often constrained by a range of operational, legal, and institutional challenges, including outdated legal frameworks, weak institutional capacity and inter-agency coordination, and limited public awareness of safe migration practices.

5.1 Legal and regulatory challenges

Regarding the legal and regulatory framework, Pakistan’s legal foundation for combating fraudulent recruitment and irregular migration rests primarily on the Emigration Ordinance of 1979, the PTPA of 2018, the PSMA, and the PECA of 2016. Although these instruments reflect a strong alignment with international standards, key gaps undermine their effectiveness.

First, the absence of a comprehensive national migration policy that integrates legal, institutional, and operational efforts across various sectors, while balancing enforcement with victim protection, risks exacerbating fraudulent job advertisements and irregular migration. The Emigration Ordinance is outdated in addressing modern digital recruitment scams and transnational trafficking networks, and its enforcement mechanisms remain weak. Although PECA is relevant for cybercrimes, it does not sufficiently capture the migrant smuggling and human trafficking components facilitated through digital platforms. Regulation of the digital landscape also struggles to keep pace with the rise of online recruitment, especially through social media and encrypted messaging apps. Moreover, the broad categorisation of all online criminal activities under the umbrella of cybercrime risks overburdening specific law enforcement units and obscuring important links between online and offline criminal networks. The lack of distinction between cybercrime, such as fraud and identity theft, and cyber-enabled crimes, such as migrant smuggling and human trafficking, allows smugglers and traffickers to be prosecuted under cybercrime law, significantly reducing conviction times. This gap enables perpetrators to exploit social media and encrypted communication technologies with little fear of prosecution.

Second, although regular labour migration is strictly regulated through the work of OEPs, many unlicensed or “paper” recruiting agents continue to operate with impunity due to weak regulatory enforcement, while educational consultants and travel agents, especially in rural areas, often escape



oversight entirely. Even when caught, penalties often allow violators to avoid imprisonment through fines, reducing the deterrent effect. Similarly, some technical training institutes are knowingly or unknowingly linked to fraudulent recruiters, offering courses that include vague or unverified job placement promises abroad.

Third, efforts to combat smuggling routes and networks require the parallel expansion of regular migration pathways, especially towards Western countries. While some labour mobility partnerships are already in place or being developed between Pakistan and several EU Member States, it is essential to further expand regular migration pathways and provide legal alternatives for jobseekers, for example, through skill and talent partnerships, scholarship opportunities, and improved recognition of qualifications. Providing safe corridors to Western countries for labour migrants would not only help alleviate demographic pressures in countries of origin and contribute to labour market needs in countries of destination, but also reduce irregular migration and curb smuggling networks.

Based on the findings, the following options are available to address the existing challenges:

- Ensure continuous evaluation and fine-tuning of the legal framework to address online fraud and transnational crimes, especially in relation to international migration, migrant smuggling, and human trafficking, and establish clear procedures to ensure the law applies appropriately to different crimes.
- Regularise the position of subagents, extend licensing to educational consultants and travel agents, and continuously monitor their activities, as well as those of all OEPs, to ensure safe and regular recruitment procedures.
- Partner with technical training institutes and universities to expand public awareness efforts and provide jobseekers with the skills needed to identify fraudulent job advertisements, while continuously monitoring the activities of these institutions.
- Adopt and implement the National Emigration and Welfare Policy to promote safe and regular emigration from Pakistan, ensure the welfare and protection of workers, and strengthen the secure digitalisation of the emigration process.
- Deepen collaboration and strengthen bilateral agreements with GCC and EU countries to expand regular labour migration pathways and improve information sharing.

5.2 Institutional capacities

Regarding institutional and inter-agency capacities, the presence of multiple federal and provincial institutions tasked with addressing fraudulent recruitment and trafficking in human beings demonstrates a willingness to tackle these issues. However, significant gaps remain.

First, although the mandates of different institutions are generally clear, the creation of multiple agencies at different levels may generate overlapping roles and shifting responsibilities, resulting in unclear accountability and duplication of effort. In addition, institutional silos appear to dominate the operational landscape, with each agency working within its own mandate, often using incompatible platforms and portals. The absence of empowered central leadership or a dedicated task force with



the technical and legal mandate to monitor, trace, and prosecute digital recruitment scams in real time contributes to inconsistent policy enforcement and fragmented responses at different administrative levels. As a result, many crimes go unreported, while others are dismissed due to jurisdictional or evidentiary limitations.

Furthermore, regulatory and enforcement bodies have limited capacity to detect, flag, or remove malicious online content in a timely manner. Many personnel lack specialised training in emerging tools such as digital forensics, artificial intelligence (AI)- and machine learning (ML)-based surveillance mechanisms, and open-source intelligence (OSINT), all of which are essential for countering tech-enabled trafficking operations. Similarly, the ability to trace cryptocurrency transactions or online payment trails, which are increasingly used to conceal financial flows linked to criminal enterprises, remains minimal, thereby hindering effective responses to emerging digital threats. Although certain institutions possess digital tools and databases, these resources are often underutilised or not used at all, due to insufficient analytical expertise and lack of inter-agency data-sharing mechanisms. The absence of system-to-system integration hampers coordination, delays investigations, and obstructs the creation of a unified, national-level intelligence system on fraudulent recruitment and trafficking. In addition, challenges persist in compelling platforms headquartered abroad to remove harmful material swiftly, with fraudulent advertisements often remaining active on social media platforms for extended periods.

In this respect, the following are key areas to consider in order to address these challenges:

- Hire specialised personnel and train existing staff in OSINT, digital forensics, financial investigations, and cross-border crime analysis.
- Leverage, continuously update, and retrain AI and ML technologies to analyse, detect, and filter large datasets of fraudulent job advertisements and identify patterns indicating potential fraud.
- Establish clear protocols and procedures to define the roles and responsibilities of different agencies involved in the investigation and prosecution of cybercrime cases.
- Improve inter-agency coordination and establish clear, standardised, and interoperable systems for real-time data and information sharing across agencies at both the national and local levels.
- Establish joint task forces that include cybercrime, migration, telecommunications, and financial intelligence experts to gather and continuously update information on the modus operandi of criminal networks, as well as to monitor and prosecute digital recruitment scams.

5.3 Improving public awareness and victim support

A further layer of complexity in combating fraudulent recruitment related to migration and trafficking lies in the low level of awareness among vulnerable populations and their limited ability to distinguish clearly between genuine and fake advertisements, particularly in rural communities. Although some awareness campaigns exist, they are often short-term and geographically fragmented, lack follow-up mechanisms, and tend to focus on the negative aspects of irregular migration. As a result, individuals



often lack access to accurate information about safe migration pathways, legal employment channels, and the warning signs of recruitment scams, especially in relation to labour exploitation or human trafficking. This knowledge gap leaves them especially susceptible to deceptive practices by unscrupulous agents or online fraudsters who may, for example, advertise newly signed mobility partnerships and, therefore, new migration opportunities in countries of destination, taking advantage of migrants' lack of awareness of formal application and employment procedures.

Adding to this is the lack of accessible, anonymous, and trustworthy reporting mechanisms for victims or at-risk individuals. Many people are unaware of where or how to report suspicious job offers or recruitment practices. Where reporting channels do exist, they are often fragmented, overly bureaucratic, or intimidating, significantly delaying institutional responses to victim reports. Language barriers, fear of retaliation, and mistrust in authorities further discourage individuals from coming forward, allowing fraudulent operations to persist unchallenged. Similarly, the lack of national-level referral mechanisms impedes the appropriate and timely support of victims once a case has been reported. While pilot referral mechanisms at the local level are in place in cooperation with international organisations and local actors, a structured process that facilitates the swift and reliable referral of individuals to the relevant agencies at the national level appears to be missing, delaying appropriate support and undermining trust in the system.

Moreover, victims of recruitment fraud or trafficking face challenges in accessing rehabilitation services and legal aid, especially if they have been deported or returned after abuse abroad. These individuals frequently experience re-victimisation, social stigma, debt burdens, and physical and/or psychological trauma upon return. Without structured support systems – such as financial restitution, psychosocial counselling, legal assistance, or reintegration programmes – victims are left to cope with the consequences alone. In many cases, the lack of access to justice or the impunity of traffickers perpetuates a cycle of exploitation, as affected individuals may be driven to attempt migration again under even riskier conditions.

Based on this, interventions along the following lines would help address these gaps:

- Develop and launch regular campaigns on safe and regular migration, especially in high-risk districts, with a particular focus on identifying fraudulent advertisements and distinguishing them from genuine ones, through TV, radio, SMS, and social media.
- Formalise partnerships with community and religious leaders, as well as with registered overseas employment agencies, to educate people about employment scams at the local level and reduce potential migrants' vulnerability.
- Expand and strengthen the National Referral Mechanism, including through digitalisation of services, anonymous reporting, and stronger inter-agency cooperation, with a clear focus on victim protection and support.



- Broaden and strengthen the work of Migrant Resource Centres (MRCs),⁵⁰ particularly in high-risk and rural areas, through community outreach sessions, awareness campaigns, and digital outreach to potential migrants, youth groups, families, and educators.
- Institutionalise awareness-raising efforts within school curricula and national labour migration policies.
- Create accessible and anonymous fraud-reporting platforms, such as mobile apps and WhatsApp helplines, while streamlining and facilitating access to official platforms for verifying the legitimacy of recruiters and online job advertisements.
- Strengthen and improve reporting and response mechanisms through digitised, anonymised, and impartial complaints procedures that better protect victims and increase trust in public institutions.
- Expand the work of CWAs and equip them with continuous training to provide legal aid, psychosocial support, and repatriation assistance to fraud victims.

Addressing these challenges requires significant institutional reforms and investments. However, it is essential to effectively combat complex transnational crimes such as fraudulent job offer schemes, irregular migration, and trafficking. A coordinated, data-driven approach, coupled with robust anti-corruption measures and improved training and technology, is critical to protect vulnerable citizens and disrupt criminal networks effectively. By addressing these gaps, Pakistan can enhance its ability to prevent fraud, protect its citizens, and strengthen the integrity of its labour migration system.

⁵⁰ Located in eight different countries (including the virtual one for Afghanistan), MRCs provide intending, potential, and returning migrants with counselling and outreach sessions on legal migration pathways, pre-departure information, and reintegration services. Jointly supervised by ICMPD and national governments, their aim is to promote safe and regular migration and reduce irregular migration. In Pakistan, the three active MRCs are located in Islamabad, Lahore, and Peshawar.



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