

**Comments of Viet Nam**  
**on the draft report “A wicked problem – Seeking human rights-based solutions to trafficking into cyber scam operations in South-East Asia”**

**1. Information on the situation and efforts of Viet Nam to prevent and combat trafficking in persons into online scam compounds**

In recent years, Viet Nam has actively implemented numerous measures to address trafficking in persons into online scam facilities and has achieved notable results, as follows:

- *On policy and legal framework improvements:* In 2024, Viet Nam promulgated the Law on Prevention and Combat of Trafficking in Persons, replacing the 2011 Law on Prevention and Combat of Trafficking in Persons. The Law added provisions on trafficking in persons for the purpose of “forcing the commission of criminal acts” and stipulates that victims who commit unlawful acts as a direct consequence of trafficking may, depending on the specific circumstances and relevant legal provisions, not be subject to administrative sanctions or criminal prosecution for those acts.

Viet Nam also issued the Programme on Prevention and Combat of Trafficking in Persons for the period 2026–2030, with an orientation to 2035 (attached to Decision No. 33/QĐ-TTg dated 7 January 2026 of the Prime Minister), replacing the Programme on Prevention and Combat of Trafficking in Persons for the period 2021–2025, with an orientation to 2030 (attached to Decision No. 193/QĐ-TTg dated 9 February 2021 of the Prime Minister). This programme sets out tasks to strictly address acts that use cyberspace and high technology to lure, broker, or organize trafficking in persons, and to strengthen screening and victim identification, with a focus on cases returning from online scam centres.

Furthermore, Viet Nam continues to promote implementation of Decision No. 402/TTg-CP dated 20 March 2020 issuing the Plan to implement the Global Compact for Safe, Orderly and Regular Migration (GCM), in order to promote safe migration and prevent the risk of trafficking in persons in international migration.

- *On capacity building:* Viet Nam has intensified training to strengthen capacity to prevent and combat trafficking in persons linked to online scams, particularly in

areas such as collecting, preserving, and processing evidence in the form of electronic data in investigations of trafficking crimes; researching and applying technology to support operations to prevent and combat high-tech crime; and developing guidance on the exercise of prosecutorial authority and oversight of the handling of cases involving offences against public order and safety committed through high-tech means, including organized and transnational crime.

- *On communications:* Viet Nam implemented nationwide the campaign “Skills to identify and prevent online scams to protect people in cyberspace in 2024”; produced communications materials and published/shared them on [khonggianmang.vn](http://khonggianmang.vn) to support outreach; strengthened warnings about traffickers’ methods via SMS messages sent to millions of subscribers; guided telecommunications and information technology enterprises to conduct anti-trafficking communications on digital platforms and social networks and via messaging to Viet Nam’s mobile subscribers; and stepped up online communications on crime prevention, drugs, social ills, trafficking in persons, and skills for child-rearing and child protection in the digital age.

The Ministry of Foreign Affairs organized a four-session seminar series on the prevention and combat of trafficking in persons in July–August 2025, broadcast on online platforms (on the occasion of the “World Day against Trafficking in Persons”, 30 July), to disseminate information and raise awareness about methods and emerging trends in trafficking crimes, especially trafficking into online scam facilities. In cooperation with the International Organization for Migration (IOM), it also organized the event “ThinkB4Uclick – Identify the signs – Stay safe in the digital environment” on 20 December 2025 to equip lower-secondary students with knowledge and skills amid increasing trafficking and online scams.

In addition, the Ministry of Public Security, in coordination with the Ministry of Education and Training, the Ministry of Health, the Ministry of Culture, Sports and Tourism, and international organizations (UNODC, UNICEF), implemented the communications campaign “Not alone – Safe online together”. It also coordinated with cross-border companies such as Google and TikTok to implement the campaigns “Prevent and combat online scams – Safer together with the Ministry of Public Security and Google” and “Combat online scams 2025”.

- *On international cooperation:* Viet Nam has strengthened coordination with several countries in the region to conduct joint operations to dismantle trafficking rings funneling victims into online scam centres. Viet Nam also actively participated in activities under the Bali Process on People Smuggling, Trafficking in Persons and Related Transnational Crime (Bali Process) and the Coordinated Mekong Ministerial Initiative against Trafficking (COMMIT Process).

In 2025, Viet Nam successfully hosted the 6th Ministerial Meeting of the COMMIT Process with the theme “Strengthening regional cooperation to combat trafficking in persons in the digital era” (19 November 2025 in Ha Noi). The meeting adopted the Sub-Regional Plan of Action Phase V 2025–2035 (SPA V 2025–2035).

Viet Nam implemented the “Mekong–Lancang Safe 2025” campaign to coordinate with competent authorities of China, Cambodia, the Lao PDR, Myanmar, and Thailand in combating telecom fraud and related crimes (money laundering and trafficking in persons) from March to December 2025. Viet Nam also implemented the Joint Working Group (RTE) to identify priority activities for the first three years of implementing the Greater Mekong Subregion Plan of Action against trafficking in persons, and participated in INTERPOL’s global operation against trafficking in persons and smuggling of migrants (Operation Storm Makers III) in 2025.

- *Enforcement actions in 2025:* In 2025, Viet Nam conducted several high-intensity enforcement campaigns to attack, suppress, and handle crimes related to trafficking in persons and online scams, such as: a nationwide peak campaign targeting illegal activities related to the use of high technology and the misuse of cyberspace; a peak coordination campaign between Viet Nam and China to prevent and combat online fraud and high-tech gambling crimes; and a peak campaign to combat illegal entry and exit in support of ensuring security and public order for celebrations of the August Revolution and National Day (2 September), etc.

Units under the Ministry of Public Security initiated and dismantled hundreds of major cases involving high-tech crimes (including online fraud). They also initiated criminal proceedings in thousands of cases and against thousands of suspects in connection with online fraud.

The strong and coordinated implementation of multiple measures has contributed to positive changes. A 2025 survey by the National Cybersecurity

Association, with participation by more than 60,000 users nationwide, also showed that the number of online scam victims in 2025 decreased markedly compared to 2024. Specifically, approximately 1 out of 555 survey participants reported being a victim of an online scam (0.18%), whereas the 2024 survey showed approximately 1 out of 220 people had been scammed (0.45%). Viet Nam also coordinated with the competent authorities of the Lao PDR and Cambodia to arrest and dismantle groups conducting online scam activities in Bokeo Province (Lao PDR), and Kampot and Kandal provinces (Cambodia).

## 2. Some comments on the draft Report

- On page 9 (Regional interventions), it is proposed to add Viet Nam’s activity as follows: “*Viet Nam hosted the 6th Inter-Ministerial Meeting (IMM6) of the Coordinated Mekong Ministerial Initiative against Trafficking (COMMIT Process) on 19 November 2025*”.

- In the third paragraph on page 12 (Legal framework), it is proposed to add Viet Nam to the list of countries that have acceded to the ICCPR and ICESCR.

- The third paragraph on page 23 (Impunity and restrictions on civic space) states that “Trafficking in persons for forced criminality continues to be absent as an offence in most counter-trafficking laws and regulations in the region”. However, additional information could be provided that Viet Nam’s 2024 Law on Prevention and Combat of Trafficking in Persons added the concept of trafficking in persons for the purpose of forcing the commission of criminal acts (stemming from the reality of trafficking into online scam centres in the region), and that Viet Nam is currently considering amendments to the 2015 Penal Code, including amendments to provisions on the offence of trafficking in persons to align with the 2024 Law on Prevention and Combat of Trafficking in Persons.

- Regarding the second bullet on page 47 (Protection), it is proposed to consider adding the following: “*Ensure that independent media, human rights defenders and CSOs working on various dimension of trafficking... in line with international human rights standards **and also national laws and regulations***”, in order to ensure that private-sector activities in this area comply with each country’s relevant laws and regulations.

- On a technical note, the second paragraph on page 25 (Misuse of digital technology) mentions a Vietnamese chat application named “Yellow” with end-to-end encryption; however, this information may be inaccurate and may reflect confusion with the application “Zalo”.