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Chairwoman Mace, Ranking Member Brown, and distinguished Members of the Subcommittee on Cybersecurity, Information Technology, and Government Innovation — thank you for the opportunity to testify today. My name is Megan Lundstrom, and I serve as the Chief Executive Officer of Polaris, a national nonprofit dedicated to ending sex and labor trafficking and supporting victims and survivors on their journeys toward freedom.

I am also a survivor of human trafficking. That experience deeply informs my perspective on the ethical use of technology in this field, particularly the need to ensure that digital tools protect the agency, safety, and dignity of survivors rather than inadvertently mirroring the dynamics of exploitation we have already endured. Before I ever led a national organization, I was a young, single mother with unmet needs that traffickers realized they could exploit. In the nearly fifteen years of direct exposure to and over a decade working against human trafficking, there is a single fact that I would like to focus on today, and that is that *exploitation is a pattern, not a platform*. I appreciate this Subcommittee's leadership in examining how technology can be used responsibly to prevent trafficking, protect victims, and strengthen the integrity of investigations and prosecutions by centering survivor autonomy. Today, I want to map the survivor journey - from vulnerability, to exploitation, to freedom - and explain how technology can either replicate the dynamics of trafficking or help end them.

I. Introduction

For more than twenty-three years, Polaris has worked directly with survivors and with advocates in the systems that serve them. Under our stewardship, the National Human Trafficking Hotline became a trusted and confidential lifeline - one that enabled victims and community members across the country to reach help and report suspected instances of trafficking to law enforcement. From 2007 to 2025, the Hotline received more than 463,000 calls, texts, chats, emails, and online reports related to human trafficking. These signals helped identify nearly 113,000 trafficking cases involving more than 218,500 victims. Approximately 74 percent of these cases involved sex trafficking or a combination of sex and labor trafficking, around 85 percent of the victims identified were women, and 29 percent of the victims identified were minors under the age of 18.[1]

This extensive body of work now represents the largest and most comprehensive dataset on human trafficking in North America. It has directly informed Polaris's broader efforts - shaping the National Survivor Study, guiding the creation of the Resilience Fund to help survivors rebuild their lives, supporting outreach that informs workers of their rights, and strengthening the development of meaningful, evidence-based policies. This has positioned Polaris as a trusted partner to thousands of service providers, dozens of federal, state, and local agencies, and a broad network of corporations and financial institutions committed to preventing trafficking within their industries. Through this unique vantage point, we have seen both the promise and the peril of modern technology in the hands of institutions working to combat exploitation.

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[1] National Human Trafficking Hotline. "National Statistics." December 3, 2025.
https://humantraffickinghotline.org/en/statistics

Human trafficking begins with unmet needs: housing, food, safety, belonging, income, immigration, stability. Traffickers promise to meet those needs when no one else can. It sounds good because the alternative is nothing. A decade ago, traffickers recruited people like me at gas stations and bus stops, and sold us through online ads, prepaid gift cards, and burner phones. Today, trafficking happens through algorithmic targeting, digital wallets, encrypted messaging, and apps. What exploitation looks like has changed because technology has changed. The motivations and methods of traffickers have not.

Before we talk about the innovation happening to combat human trafficking, we must remember that the data we are talking about is not abstract - that data represents a person. Each line of data tells a story of a life forever changed by exploitation. Traffickers sell the most vulnerable parts of us to line their pockets. If we collect, use, share, analyze, or profit from that data without guardrails that include and consider the survivor experience along the way, we risk replicating the very dynamics of exploitation that we aim to end. We must emphasize the importance of ethical and inclusive technological and legal frameworks to both anticipate exploitative behaviors and to avoid replicating them and exacerbating harm. This framework reflects a commitment to protecting survivors rather than enabling exploitation.

II. How Human Intent Shapes the Role of Technology in Trafficking

Technology has not changed the *motives* or *methods* of traffickers; it has simply given them new tools to target, control, exploit, and profit. As the U.S. State Department's 2024 Trafficking in Persons Report[2] highlights, traffickers readily adapt emerging technologies to continue the same patterns of recruitment, grooming, control, and exploitation, but now at far

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[2] U.S. Department of State. "2024 Trafficking in Persons Report." December 3, 2025.
https://www.state.gov/reports/2024-trafficking-in-persons-report/

greater speed and scale than they have been able to historically. The tools themselves are neutral. It is the intentions and behaviors of those who wield them that determine whether technology becomes a lifeline for safety or a mechanism for harm. Many survivors, including myself, have experienced how online platforms, encrypted communication tools, and anonymous payment systems can be repurposed by traffickers to extend and conceal their abuse. As one example, during the COVID-19 pandemic, we found that reports of online sexual exploitation increased by 45%, while other forms such as street-based prostitution decreased, demonstrating that even during a global pandemic, trafficking still occurred and only shifted in location.[3]

At the same time, the use of technology in anti-trafficking responses raises serious concerns—particularly for survivors who have been criminalized for their own exploitation. When digital tools are used without guardrails, there is a real risk of overbroad surveillance, improper data collection, and unconstitutional intrusions that violate Fourth Amendment protections. Survivors who were once harmed by traffickers can find themselves harmed again by systems that access or use their digital information without adequate safeguards. Ensuring that technology serves justice rather than undermines it requires careful attention to how these tools are deployed, who controls the data, and whether constitutional rights—especially for the most vulnerable—are being fully upheld.

Therefore, the data and technology field must recognize that not all technological interventions advance justice, and just because we *can* collect data or utilize it in certain ways doesn't mean that we *should*. For example, a tool designed to identify victims or disrupt trafficking networks can unintentionally mirror the surveillance survivors experience during our

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[3] Polaris. "Sexual Exploitation During the Pandemic: A Snapshot, April 2021." December 9, 2025. https://polarisproject.org/wp-content/uploads/2021/07/Sexual-Exploitation-During-the-Pandemic.pdf

exploitation if it is created or deployed without transparency, consent, or survivor involvement. Similarly, traffickers often withhold information, make promises about safety or opportunity, and conceal the true purpose of their actions until it is too late. When systems that are supposed to protect survivors adopt practices that are opaque, non-collaborative, or fail to clearly communicate risks and intended uses, they can inadvertently replicate those same patterns of control.

Transparency is a core component of trauma-informed practice, precisely because so many survivors have lived through situations in which their autonomy and access to information were deliberately stripped away. I have heard survivors describe moments when a trafficker promised something as simple as a place to stay, a job, or a safe ride—only for them to later discover the real conditions attached to that promise. When anti-trafficking technologies are designed or implemented without openly sharing how data will be used, who will have access to it, or what risks may arise, survivors can experience that same sense of betrayal and loss of agency. Without this trust, survivors will seek out new platforms that they perceive to be less 'invasive,' thus opening potential opportunities for additional exploitation.

Short-term investigative gains achieved through invasive or non-consensual data collection ultimately undermine long-term outcomes if survivors withdraw from prosecutions, avoid services, or lose trust in the very systems meant to support them. Our approaches must not—even unintentionally—resemble the tactics of traffickers.

However, when technology is built *with* survivors—not merely for observing or identifying them—and in genuine partnership with subject-matter experts, it can strengthen safety, expand access to services, illuminate trafficking networks, and support prosecutions that

protect victims rather than relying upon their trauma. Survivor involvement is not only ethically essential; it also creates meaningful opportunities for employment and leadership. For many survivors, contributing to the design of safer and more transparent systems becomes a form of restorative or experiential justice, allowing us to help ensure that others do not face the same hidden conditions or broken promises we once endured. The true challenge and opportunity is to ensure that technological innovation always remains grounded in the lived realities of the people it is intended to help.

III. Technology That Survivors Trust and Guide

Across our portfolio of programs and initiatives, Polaris has always answered the call of survivors, including our data and intelligence work. All of our work originates with listening to survivors and the needs and solutions they have identified. It is not sufficient to tokenize a survivor by asking for a "stamp of approval" once a project is complete, as this is yet another form of re-exploitation. Polaris embeds survivors as co-creators from day one. Survivors play an integral role in shaping the governance structures that guide what tools we develop and why, as well as how (and what) we collect, store, analyze, and share data, informing testing priorities, risk assessment processes, and decisions about what is safe and appropriate in any given context. Polaris's truly survivor-centered approach not only ensures that our technology and data initiatives serve those they are intended to protect, but is ultimately why our initiatives see so much success. Our internal governance systems ensure that privacy protections are robust, data is used only for anti-trafficking purposes, and partnerships with technology companies operate within defined ethical guardrails. Equally important, we prioritize transparency, explainability, and subject-matter expertise. Human trafficking is a complex crime that cannot be understood

solely through pattern recognition or machine learning - we must pair the authentic intelligence of the people with firsthand experience to the artificial intelligence that is helping us combat trafficking faster and more effectively. Our analysts and technologists — which include survivors — collaborate to interpret data, evaluate risk, and ensure that tools are grounded in real-world context.

This approach is critical because, in this field, the most effective technology is not merely what is launched fastest or has the most attractive packaging — it is responsible, trauma-informed, and grounded in the realities of survivor experience. The most effective technology is the tools that survivors trust most.

IV. Centering Survivors in Data and Intelligence

In the area of survivor outreach and care, Polaris is working to deploy trauma-informed digital tools that extend immediate, confidential guidance to individuals seeking help. One such tool is The Parasol Cooperative's "Ruth," a trauma-informed AI chatbot designed to assist individuals in identifying and navigating crises by creating personalized safety plans, navigating online spaces securely, and understanding available options and resources. "Ruth" was built in partnership with technologists, lived-experienced experts, and crisis response experts.

"Ruth" is already in use by the National Domestic Violence Hotline and in the two months Polaris piloted it earlier this year, it assisted more than three thousand individuals through Polaris's National Human Trafficking Hotline and over 40,000 through the National Domestic Violence Hotline. This tool does not replace human advocates; rather, it provides survivors with support during the critical moments when they may be assessing their risk or considering seeking help but not ready to do so just yet.

Polaris also works closely with a range of partners to collaborate on best practices for technology use in the anti-trafficking field – including The Parasol Collective, the National Center for Missing & Exploited Children (NCMEC), Stop The Traffik, Allies Against Slavery, technology partners, corporate leaders in hospitality, transportation, and financial services, and volunteers. These collaborations allow us to translate data insights into practical improvements in corporate safety protocols, frontline training, and system-level prevention strategies. For instance, through their Lighthouse platform and data visualizations, Allies Against Slavery is able to assist other actors in the field to make data-informed decisions. Our role is to help partners understand the realities of trafficking and apply ethical, survivor-centered approaches when using technology or interpreting data. This collaborative model ensures that technology is deployed in ways that are grounded in lived experience and respected expertise, rather than assumptions or misconceptions about trafficking.

In the intelligence and enforcement domain, Polaris established the Financial Intelligence Unit (FIU), which uses open-source intelligence and technology-assisted analysis to identify suspicious businesses, financial patterns, and trafficking networks. The FIU collaborates with more than twenty major financial institutions and law enforcement partners to pursue traffickers for financial crimes such as money laundering, fraud, or tax evasion. Polaris is expanding its vision beyond financial institutions to engage the broader private sector, while leveraging its partnership with *Stop the Traffik* to produce intelligence packages with global reach. This evolution positions the FIU to disrupt trafficking networks more effectively while continuing to center survivor safety and minimize additional trauma.

Finally, Polaris uses advanced analytic and AI-driven modeling tools to inform prevention strategies and public policy. With input from survivors and experts, we have created a

prescriptive AI tool that helps us understand the root causes of trafficking while keeping survivor safety and privacy at the center of our work. The tool is a way to synthesize credible data sources to provide the evidence base to guide decision-making by policymakers and practitioners. Using the early prototype of this tool, we have identified child poverty as one of the strongest predictors of trafficking risk based on publicly available data sources and data from the National Human Trafficking Hotline. The tool enabled us to evaluate how policies such as New Mexico's universal child care program might reduce vulnerability and disrupt pathways into exploitation.[4] Specifically, the tool predicted that a policy such as that passed in New Mexico could potentially reduce trafficking rates by 26%, primarily by addressing child poverty rates. These insights allow policymakers and community leaders to intervene earlier and more effectively.

We envision that by combining ethical AI with survivor expertise, we can create models that identify at-risk communities, evaluate the impact of proposed policies before they are implemented, and direct resources where they can make the most difference. This is not just about technology and data—it is about building systems that prevent harm before it happens, reduce trauma, and strengthen the safety net for vulnerable populations. Congress has a critical role in supporting these innovations through funding, policy guidance, and oversight, ensuring that technology and analytics are applied responsibly, ethically, and by engaging impacted communities and survivors to break the cycle of exploitation.

V. Guiding Principles for Ethical Technology

Drawing from more than two decades of field experience and from the perspectives of survivor leaders, Polaris encourages Congress and federal agencies to adopt several guiding

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[4] Office of the Governor. "New Mexico is First State in Nation to Offer Universal Child Care." December 9, 2025. https://www.governor.state.nm.us/2025/09/08/new-mexico-is-first-state-in-nation-to-offer-universal-child-care/

principles for the responsible use of technology in the anti-trafficking landscape. Congress can play a critical role in fostering tools that enhance safety and accountability, including trauma-informed digital platforms, secure referral systems, and analytic capabilities that help communities address risk before exploitation occurs.

1. **Preserve Survivor Autonomy:** Survivors' dignity and privacy must be protected at every stage of technological development and deployment. Tools that compromise these principles risk causing further harm.

2. **Include Survivors and Experts in Design:** Survivor leaders and subject-matter experts should be engaged - and compensated - from the onset in the creation, evaluation, and ongoing monitoring of technology used for victim identification, service provision, or law enforcement investigations. Their expertise is essential to avoiding harmful or misleading outcomes.

3. **Maintain Strong Data Governance:** Sensitive data must be thoughtfully and ethically collected, securely stored, appropriately shared, and used only for legitimate anti-trafficking purposes.

VI. Conclusion

Ultimately, traffickers are opportunists, and because they do not have restrictions such as governance and compliance factors to navigate, they will always be early adopters of new technologies. As such, traffickers remain one step ahead of us as we go through time-consuming processes to change existing systems and laws. Our national response to combating human trafficking must always be nimble enough to evolve with the changing trends, but we also need to start thinking proactively rather than reactively. Rather than reacting to singular platforms and

tools, we need to collectively understand the objectives, mentality, and motives of traffickers and build our tools with these in mind from the beginning. One of the best ways to do that is to listen to those of us who have survived trafficking because we understand how traffickers have evaded detection and exploited systems.

Polaris stands ready to support Congress, federal agencies, technology developers, and law enforcement in building a future where data and digital tools enhance safety, expand access to justice, and uphold the rights of those most affected by this crime.

Thank you for the opportunity to testify today. I look forward to your questions.