



eBook

# WORKING TOGETHER TO FIGHT HUMAN TRAFFICKING AND MODERN SLAVERY



eBook

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# The Scale of Human Trafficking is Staggering





**Human trafficking and modern slavery** is the 3<sup>rd</sup> largest source of criminal profits globally <sup>1</sup>



**5.4 out of every 1000 people** globally are victims of modern slavery <sup>3</sup>



It is estimated these crimes generate over **\$150B** annually <sup>2</sup>



An estimated **40.3 million** people are victims of modern slavery globally <sup>3</sup>



High value purchase at a  
beauty store

Booked two hotel rooms  
on one day

Late-night manicure purchase

# The Intersection of Human Trafficking and Anti-Money Laundering

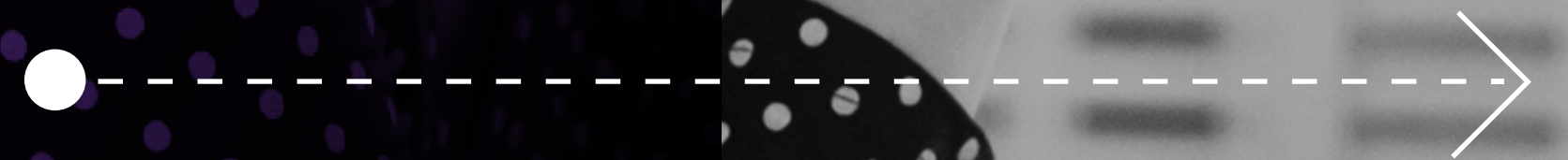
Human traffickers use the global financial system to conduct business and launder proceeds. With access to behavioral information and transaction activity, AML teams are uniquely positioned to quickly identify red flags and report suspected human trafficking.

**Where regulators have explicit human trafficking guidelines and reporting requirements, there is up to a 1,000 percent rise in reporting compared to jurisdictions without clear requirements.<sup>2</sup>**



# Red Flags Along The Victim's Journey

Human Trafficking and  
Modern Slavery Starts







# Transportation

- Frequent or high-value purchases at fast-food restaurants, airports, ports, transport hubs, or overseas, inconsistent with individual's personal use or stated business activity
- Two hotel rooms booked by one individual for the same dates

1

Red Flags Along The Victim's Journey



## Lodging

- Multiple people with different family names sharing the same address, account, or assets
- Account lacks living expenses such as food, petrol, utilities, and rent
- Wage deductions for costs like housing or food



2

Red Flags Along The Victim's Journey

## Preparation for Work

- Frequent or high-value purchases at drug stores, clothing stores, and beauty stores (lingerie, make-up)



3

Red Flags Along The Victim's Journey



## Work

- Frequent travel including the ‘transportation’ red flags
- Invalid work contracts or group travel for conferences, seminars, or study
- Transactions outside known business hours like late-night ride-sharing and manicures
- Unreasonably low pay or identical pay in jobs where that would not be expected (no overtime, vacation, sick pay, bonuses, etc.)
- Non-payment of taxes, worker’s comp, and other fees to a tax authority
- Wages remain untouched
- Payroll checks are deposited into the employer’s account or kept by the employer
- Room service and restaurant services, but no hotel booking



4

## Leveraging Victim's Financial Accounts

- Simultaneously opening and closing multiple individual accounts
- Account in childrens' names with significant activity
- One agent or attorney representing multiple undocumented individuals at multiple locations
- Employer as the custodian for accounts of foreign workers and students
- Government assistance checks are deposited into the account even though the account holder may have a substantial amount of money
- Account debits are frequently made in a different geographic location than where the deposits were made



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# Red Flags Along The Perpetrator's Path





# Business Account Opening

- Stolen or falsified ID, potentially from a victim
- Name of individual who reported identity theft
- PO box address
- Multiple addresses, phone numbers, or names
- Broad corporate goals
- Account address connected to red-light districts or buildings with commercial sex work
- Name check comes back with criminal connections, sanctions listings, or media coverage related to human trafficking like prostitution rings or the sex trade

1



## Business Facilitation

- Email connected to online adult advertising services
- Transactions to escort agencies or classified sex industry advertising services
- An unusual number of unrelated individuals as authorized users
- Relatively high expenditures unrelated to business purpose



2

Red Flags Along The Perpetrator's Path

# Legitimate Business Appearance Maintenance

- Use of a cash intensive business purpose, like a nail salon, car wash, laundromat, to mask the true source of cash
- Fictitious loans provided by shareholders and subsequently transferred back
- Structuring via commercial entities and transfer of money using a contract for loan



3

Red Flags Along The Perpetrator's Path



## Receipt of Payments for Services

- Repeated cash withdrawals and deposits in multiple cities at multiple ATMs or branches
- Payments with incomplete information or third parties listed in brackets
- Payments between charities & medical tourism sites
- Payments to employment or student recruitment agencies that are unlicensed / unregistered or have labor violations
- Money transfers from many males to one female
- Money transfers from different regions to the same person in a high-risk jurisdiction
- Refining activity (exchanging small denomination bills into larger denomination bills)
- Parceling of wire transfers
- Cross border transfers inconsistent with the stated business purpose or from areas with a high risk of trafficking



4



## Measures to Evade Detection

- Frequently changed or unreliable addresses or phone numbers
- Use of money orders, bank drafts, cryptocurrency, credit-card transfers, online payments, cash couriers, or cash to pay bills, purchase assets for the business, or transact with casinos, medical businesses, classified advertising services, and pornography services
- Cash transactions just under reporting requirements
- Assets registered under different names
- Structured electronic transfers or wires
- Circulation of funds between seemingly unrelated accounts

5





## Other Indicators

- Unexplained / unjustified large profits for a company
- The majority of the company's capital is in no-term deposits and has a large turnover
- The individual's lifestyle is inexplicable compared to their client profile

6

Red Flags Along The Perpetrator's Path

# How You Can Help Fight Human Trafficking





## Identify Activity Indicative of Modern Slavery

- Leverage technologies like identity resolution to move towards single, holistic and comprehensive entity risk profiles
- Put in place a strong KYC and CDD program that thoroughly assesses corporations and individuals to fully understand them and their risks
- Leverage new and existing typology reports to create detection models that spot transactional and behavioral red flags
- Incorporate checks for human trafficking into your organization's workflow or alert management processes
- Analyze current detection and investigation data to identify ways to improve effectiveness

## Report Suspected Human Trafficking

- File a SAR/STR when you suspect human trafficking
- Mention human trafficking in your narrative with the rationale to support your suspicion

## Build Strategic Partnerships

- Partner with government agencies, non-government organizations (NGOs) and other financial institutions to share intelligence to better understand emerging red flags

## Train Yourself and Your Teams

- Complete FinCrime-specific trainings on human trafficking and modern slavery to understand the financial red flags
- Train banking staff on signs of human trafficking

# Join the fight against human trafficking and modern slavery with NICE Actimize.

Learn more about Human Trafficking >

Explore Crime-fighting Solutions >

**NICE**  
ACTIMIZE

<sup>1</sup> ACAMS. Fighting Modern Slavery & Human Trafficking Certificate | ACAMS. (n.d.). Retrieved 2021, from <https://www.acams.org/en/training/certificates/fighting-modern-slavery-and-human-trafficking#intended-audience-a0160533>

<sup>2</sup> United Nations University Centre for Policy Research. (New York, 2019, September). Unlocking Potential: A Blueprint for Mobilizing Finance Against Slavery and Trafficking. Retrieved from <https://www.fastinitiative.org/wp-content/uploads/Blueprint-DIGITAL-3.pdf>

<sup>3</sup> International Labour Office and Walk Free Foundation. (2017). Global Estimates of Modern Slavery. Retrieved from [https://www.ilo.org/wcmsp5/groups/public/---dgreports/---dcomm/documents/publication/wcms\\_575479.pdf](https://www.ilo.org/wcmsp5/groups/public/---dgreports/---dcomm/documents/publication/wcms_575479.pdf)

## About NICE Actimize

NICE Actimize is the largest and broadest provider of financial crime, risk and compliance solutions for regional and global financial institutions, as well as government regulators. Consistently ranked as number one in the space, NICE Actimize experts apply innovative technology to protect institutions and safeguard consumers and investors assets by identifying financial crime, preventing fraud and providing regulatory compliance. The company provides real-time, cross-channel fraud prevention, anti-money laundering detection, and trading surveillance solutions that address such concerns as payment fraud, cybercrime, sanctions monitoring, market abuse, customer due diligence and insider trading.

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