Tackling illicit financial flows at source: The usage of locational data in risk-based transaction monitoring for human trafficking and related money laundering activities

Dr Frank Haberstroh, Finance Against Slavery and Trafficking (FAST) Initiative, United Nations University Centre for Policy Research (UNU-CPR), New York, USA[1]

haberstroh@unu.edu

Abstract

This paper examines the potential of location risk-based transaction monitoring for financial flows from human trafficking and exploitation as well as related money-laundering activities. It presents different approaches that use crime-specific high-risk locations as red flags for the detection of relevant activities. They include the application of customized high-risk country lists and the increased monitoring of transaction channels between typical source countries and destination countries of trafficked individuals. The paper illustrates how a refined search for the involvement of specific regions and cities, and an advanced monitoring of suspicious transactions along known trafficking routes can substantially increase the accuracy of indications for human trafficking and exploitative crimes. After a promising pilot in Germany in 2020, the concept is currently being tested and further developed by more than 20 organizations in a project within the Europol Financial Intelligence Public-Private Partnership. To illustrate the potential of the approach, the paper refers to ongoing practical work and related findings. To the extent possible, the case studies contain detailed information on the amounts of the transactions concerned, the criminal proceeds related to them, as well as indications for consistent typologies of financial activities accompanying trafficking crimes. The concept has been developed for human trafficking and exploitative crimes, but it may well be transferable to other forms of trafficking crimes such as drug trafficking, illegal arms trafficking, wildlife crime, and trafficking in cultural property.

Keywords

Transaction monitoring, human trafficking, trafficking crimes, typologies, public-private partnership

Introduction

As stated in the address by former Financial Action Task Force (FATF) president Dr Marcus Pleyer to the G20, failing to act against money laundering not only undermines the legitimate private sector and damages trust in financial markets but it also "means organized criminals trafficking people, drugs, arms and wildlife, and corrupt stakeholders and terrorists, operating with impunity. Taking the profits out of these crimes will protect people, the environment and the economy" (Pleyer, 2020). Indeed, one of the overarching aims of the international anti-money laundering (AML) framework is to help fight organized crime, major predicate offences, as well as their devastating societal impact.

Trafficking and exploitative crimes in all their forms[2] are among the most profitable of these predicate offences, generating annual proceeds of several billion USD (UNODC, 2011). Among trafficking crimes, human trafficking and human exploitation stand out in the way they violate fundamental human rights and cause immense harm to the victims and entire communities. In 2020 about 50,000 human trafficking victims were detected and reported by 141 countries (UNODC, 2023a).[3] However, global estimates indicate that 49.6 million people are currently living in a situation of human trafficking or modern slavery globally (ILO, Walk Free, & IOM, 2022), whilst forced labor alone is estimated to generate USD 150 billion in annual profits (ILO, 2014).

One could therefore reasonably expect that financial institutions worldwide apply indicators for human trafficking in their risk-based and automated monitoring for conspicuous transactions, either to identify transactions directly related to these crimes (i.e., payments for trafficking services), or transactions concerning the placement of the related proceeds into the global money laundering circuit.

[1] Current AML and Sanctions Lead within UNU-CPR/FAST, Project Manager of the Europol Financial Intelligence Public Private Partnership's (EFIPPP) Project "Trafficking in Human Beings", and former Head of the German Anti-Financial Crime Alliance's (AFCA) Project "Financial Flows from Human Trafficking".
[2] I.e., human trafficking and modern slavery, drug trafficking, illegal arms trafficking, wildlife crime, and trafficking in cultural property.
[3] The following numbers of detected victims reported are indicated for the period 2017-2020 (p.11): 2017 (44,989); 2018 (46,384); 2019 (49,692); 2020 (46,850); 2020 or most recent (53,800); total 2017-2020 (187,915).

Surveys indicate, however, that deficits remain significant and that the percentages of concrete measures are low. Customer due diligence procedures and transaction monitoring processes of most financial institutions are not yet targeted to human trafficking. A survey taken by 216 international private sector anti-financial crime professionals, conducted as part of an Association of Certified Financial Crime Specialists (ACFCS) webinar on modern slavery risks[4], showed that only 32% of participants have implemented rules and monitoring typologies for human trafficking related transactions.[5] Furthermore, only 16% of respondents indicated identifying customers from geographic regions at risk of human trafficking as part of their customer due diligence and transaction process. A second survey of 326 private sector AML professionals at the same event showed that 66% of respondents consider that more information on red flags and transaction typologies would be particularly beneficial to them in detecting human trafficking transactions and activities.[6] Results that are in line with findings of the United Nations University Centre for Policy Research (UNU-CPR) - Finance Against Slavery and Trafficking (FAST) initiative, which highlight the fact that the lack of indicators suitable for automated transaction monitoring of these crimes is a major concern (Haberstroh & Zaugg, 2023).

Nevertheless, awareness is growing in the financial sector and initiatives worldwide are addressing the challenges described. An increasing number of domestic and cross-border public-private partnerships (PPPs) are working on understanding the specifics of trafficking crimes, and their concepts may gradually find their way into the compliance processes of participating financial institutions. Human trafficking, in particular, has become the third most frequent issue addressed by PPPs worldwide, ranking immediately after AML and counter-terrorist financing (CFT).[7]

This paper presents an approach that has been conceptualized and tested since 2020 by one of these PPPs, the German Anti-Financial Crime Alliance (AFCA). It focuses on the risk-based consideration of countries, regions, and cities of special relevance for human trafficking activities. The approach was taken up by the FAST initiative, that developed it further and placed it at the center of their transaction monitoring concept. Since March 2023, the Europol Financial Intelligence Public-Private Partnership (EFIPPP)[8] is also testing the model and advancing it with innovative ideas from its participants. More than 20 organizations have joined EFIPPP's efforts in this regard, including financial intelligence units (FIU) of five countries and nine banks considered by the Financial Stability Board to be "global systemically important". This is a clear sign of the importance that major players are assigning to the phenomenon and the potential they see in the location-based monitoring approach.

Although the projects mentioned target financial flows related to human trafficking and exploitation only, many of the location-based monitoring techniques developed and tested by them are likely to be analogously applicable to other trafficking crimes as well, be it drug trafficking, arms trafficking, wildlife trafficking, or the illicit trade in cultural property. The concept described hereafter, and the results obtained so far, illustrate how an advanced understanding of the trafficking crime risks associated with specific locations - be they countries, regions, or cities – can help to develop targeted location-based monitoring techniques that detect financial activities related to trafficking crimes.

Since the targeting of high-risk countries is an essential part of these techniques, this paper starts with describing the considerations underlying their identification. It will be shown why the identification of high-risk countries for trafficking crimes follows different criteria from those for money laundering risks. This is supplemented with elaboration on the challenges faced when identifying high-risk countries specifically from a human trafficking perspective, i.e., the widespread lack of relevant criminal statistical data. The following sections then turn to more concrete risk-based monitoring techniques and initial findings that resulted from them, i.e., the actual usage of the

[4] Webinar by Eckstein, A., Haberstroh, F., & Svoboda-Kindle, B., held on 11 August 2023 as part of the ACFCS Fincrime Virtual Week (7-11 August 2023), titled "Using CDD and Transaction Monitoring to Combat Human Trafficking: Perspectives from the UN FAST Initiative".
[5] A number that, due to the high proportion of US and Canadian participants, can be expected of being still well above the actual international average, given both countries' high dedication in this area compared with international counterparts.
[6] The webinar had a total of 579 attendees, 216 of whom participated in the first survey conducted at the beginning of the event and 326 in the second survey, which was done at the end of the presentation.
[7] Information shared as part of a "Research briefing on public-private partnership and private- private information-sharing from an international perspective" by Maxwell, N., head of the Royal United Services Institute's Future of Financial Intelligence Sharing research programme, during the "FinCrime Forum on Collective Action to Tackle Financial Crime in Germany", held in Frankfurt, Germany, on the 24 April 2023.
[8] Since its establishment in 2017, EFIPPP explores and enhances cross-border cooperation and information exchange in the field of anti-money laundering and counter-terrorist financing. It is the first cross-boarder public-private partnership of its kind. As of 2021, 79 institutions, including Europol, law enforcement agencies, financial intelligence units, financial instutions ans international organizations, from over 18 EU and non-EU countries, have joined the group, and engage in various workstreams and projects. The "Trafficking in Human Beings" Project is part of the "Threats and Typologies Workstream" and was established in April 2023. Formal project deliverables are expected for December 2023.

high-risk country element in transaction monitoring, the increased monitoring of transactions between relevant countries, as well as increased scrutiny of specific regions, cities, and trafficking routes of concern.

Assessing Country Risk of money laundering: Legal and institutional risk drivers

Understanding risk is about knowing the likelihood of something unwanted happening. In the AML field, this translates to the probability of a financial institution being knowingly or unknowingly involved in third party money laundering activities through its own business activities and banking services. To determine this risk, which by its very nature deals with the uncertainty of the future, financial institutions rely on the assessment of different risk factors, relating to types of customers, particular products, services, and transactions, as well as countries or geographic areas of concern (OECD, 2022).

The latter element, especially, can manifest itself in many ways. Country-specific or geographic risks may arise from the place where the financial institution maintains a branch, from the location of the parties to transactions that financial institutions process, and/or from the domicile of the customers they serve. To standardize the corresponding assessment and optimize the processes, financial institutions maintain pre-defined country lists in which they assign all countries of the world to certain money laundering risk categories, such as low, medium, and high risk.

The way in which a country risk rating is carried out is up to the individual financial institution and therefore varies between institutions. In general, it should follow a verifiable and consistent analytical process and reflect country risks identified by the FATF and the applicable National Risk Analysis. In line with the methodology underlying the Basel AML Index, elements that usually have a negative impact on a country's risk rating include shortfalls in its AML/CFT framework in particular, but also high degrees of corruption and bribery, poor financial transparency and standards, poor public transparency and accountability, as well as weak political rights and rule of law (Basel Institute on Governance, 2022). Other factual criteria, such as a globally significant financial sector which processes high shares of the world's financial transactions - thus probably showing higher volumes of illicit flows in absolute terms - are of less importance.[9]

The fact that the legal and institutional framework is decisive for the assessment of AML/CFT risk is because money laundering is particularly favored by factors which are also of a legal and institutional nature. Strong banking secrecy, corporate legal forms that allow indirect control, and limited legal possibilities for authorities to share data with other countries, are natural locational advantages for money launderers whose core activity is the concealment of both the origin of funds and the ones owning them. In addition, the international and IT-based nature of the financial market makes it possible to use these country-specific options globally from a distance and regardless of the location of the perpetrator, which explains the prominent role of remote offshore locations in many money laundering schemes and why they are considered to pose higher money laundering risks irrespective of where the financial institution performing the assessment is located.

Assessing Country Risk of trafficking crimes: Factual and logistical risk drivers

Just as financial institutions may knowingly or unknowingly be involved in money laundering activities, they may also be engaged in the financial activities that relate to its predicate offenses. In the case of trafficking crimes, this includes the payment for the trafficked goods between criminal traders or between the organized criminals and consumers, namely the money received for trafficked drugs, human beings, weapons, wildlife, or cultural goods. It also includes transactions enabling the trafficking crimes, such as payments for transportation, food and accommodation, document forgery, and other criminal services between criminal actors. Finally, a financial institution may also be unknowingly implicated at the point when the transition from predicate offense to money laundering occurs, namely when the often substantial profits from trafficking crimes are introduced into the financial system.

The risk for financial institutions to be involved in these criminal activities can be analyzed with a risk-based approach and the parameters known from the assessment of money laundering risk. For instance, certain types of customers, especially from specific industries, have a higher risk of being involved in trafficking crimes than others (Walk Free, 2023). A bookstore, for example, has a much lower risk of being involved in arms trafficking,

[9] A fact that might be rooted in the grey/black listing procedures of FATF and EU, which are seen critically by a considerable fraction of academia. The main points of criticism are that only 1% of international financial flows go through the 25 countries that have been on the FATF's gray list (as of February 2023), whilst OECD countries - which are probably managing the bulk of global illicit flows - are rarely listed by the FATF. Moreover, it is criticized that EU blacklisting decisions follow not only technical but also political considerations. See, for a conference report describing the informal consensus amonst researchers in this regard, Sharman, J. (2023).

drug trafficking, human trafficking, or other trafficking crimes, than an arms manufacturer, a freight carrier, or a mining company, respectively. Likewise, certain banking products have higher risks of being associated with trafficking crimes than others. One might think of various trade finance and cross-border transaction services that are more likely to be misused for transactions related to trafficking crime than a savings account at a regional bank.

When looking into the risk factors concerning countries or geographic areas, it is likely that the typical source countries of the traded commodity will figure as a relevant location in a transaction or as the nationality of the perpetrators involved in the trafficking crime.

An illustrative example in the area of *drug trafficking* is the cultivation of coca. Being the key source material for the global cocaine market, it is estimated to have an annual worth of USD 85 billion (UNODC, 2011). 100% of the global production is accounted for by only three countries, namely Colombia, Peru, and the Plurinational State of Bolivia (UNODC, 2023b).[10] Thus, almost all global criminal supply chains related to cocaine originate in one of these three countries. The criminal actors who exploit the fields, extract the raw material, and/or initiate transport are in fact and logistically linked to the cultivation area and, consequently, to these countries. Transactions from or to such countries, or involving companies or individuals from them, have therefore an increased probability of being associated with drug trafficking in general. They can be considered as high-risk countries when assessing the risk of a financial institution handling financial transactions related to drug trafficking.

Similarly, for *wildlife crimes*, *arms trafficking and trafficking in cultural property*, countries on whose territory the most traded exotic animals, plants, or timber on the black market occur, in which a just-ended military conflict or political transition has left a surplus of armaments that are no longer needed, or where an ongoing civil unrest or conflict allow for the misappropriation of cultural goods, are also source countries for trafficking crimes. Countries that meet these criteria should therefore be considered high-risk countries when assessing a financial institution's risk of being involved in wildlife crime, arms trafficking, or illegal trade in cultural property. Complementing crime-specific high-risk country lists should be those countries in which increased percentages of global buyers of the goods typically or expectedly reside or from where the international organized criminal groups that largely control the crime in question come from.

When it comes to *the trafficking and exploitation of human beings*, the identification of potential source countries is more complex. Human trafficking occurs in every region of the world and states can be the origin, transit or destination country for victims, or even a combination of all. As all countries are potential source countries of human victims, criminals go for individuals that are nearer and easier to exploit. This explains why in most countries the largest group of persons trafficked are nationals, followed by citizens from countries of the same region, who show an increased vulnerability to being exploited, due to local socioeconomic disadvantages compared to the neighboring destination country (UNODC, 2023a).[11]

However, in cases where *human-exploitation occurs online*, the geographic proximity between the exploited person and the exploiting individuals becomes irrelevant. Specific countries might therefore become source countries for the entire world. In the case of online child sexual exploitation through the live broadcasting of abusive acts against minors, for instance, the Philippines is known by organizations like UNICEF to be the "global epicenter of the live stream sexual abuse trade" (Brown, 2016), accessed by pedophile consumers from all countries of the world. When it comes to the production of recorded child sexual abuse material in general, moreover, countries like Thailand and Mexico appear to show particularly high prevalence (UNODC, 2021; ECPAT, 2018). Driven by a growing global demand for online child sexual abuse material during the Corona pandemic, levels of such criminal activity have risen significantly in some of these already affected countries, as indicators show (WeProtect, 2021).[12] This suggests that existing criminal networks are increasing their capacity, so logistical and factual realities are the drivers behind the increased risk.

In essence, factors like the local availability of the goods or the existence of already established criminal structures, are the central risk drivers for the country risk of all trafficking crimes, especially when assessing the risks of typical source and destination countries. Aspects that are factual circumstances and on which both the current and

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[10] Colombia 61%, Peru 26%, and Bolvia (Purinational State of) 13%, see UNODC, 2023b, p.15.

[11] Out of 87 countries that shared criminal statistics on the specific nationality of victims for the 2022 UNODC Trafficking in Persons Report (UNODC, 2023a), 44 indicated explcitily own nationals as the biggest group. Others have identified their own nationals and foreign nationals as victims, but have not provided specific numbers. See country reports which accompany the main report.

[12] Indicators include, for example, increases in reports of child sexual abuse materials discovered online, increases in Internet searches for child sexual abuse material, and increases in cases of online sexual abuse; see WeProtect, 2021, p. 23.

a potentially adapted legal framework have only a limited influence.[13] This is a significant difference from the above-mentioned drivers of countries' money laundering risks.

Assessing Country Risk of human trafficking: Country and region-specific evaluations

As shown, for most trafficking crimes, some countries are typical places of origin of relevant trafficked goods on a global level. Together with especially relevant consumer countries, such as China and Vietnam, Laos, which are key destinations for many trafficked wildlife goods like tiger bones, rhino horns, and pangolins (Stephens & Southerland, 2018; Qian, 2018), they must be considered as high-risk jurisdictions from a predicate offence perspective. Based on the totality of countries so identified per trafficking crime, it is possible to create a predicate offence-specific country risk lists, analogous to those used in the AML/CFT framework, and which in principle could be equally valid for financial institutions and FIUs in all countries of the world.

However, when it comes to human trafficking and modern slavery, the identification of source countries is only determinable to a limited extent. While there are countries like China, Nigeria, the Philippines, and the Bolivarian Republic of Venezuela, that are indicated as the place of origin of identified victims and perpetrators in a particularly large number of third countries, it is still questionable if they could be considered as high-risk countries globally.[14] Often, they are named in criminal statistics of specific countries but play only a minor role compared to other nationalities in terms of case numbers in the particular country and/or the group of countries in which they occur are in specific regions instead of being spread equally around the world.

This does not mean that a risk-based consideration of high-risk countries is not possible when assessing human trafficking and modern slavery risks. The difference to what applies to money laundering and most of the other trafficking crimes is merely that the classification must differ depending on the residence of the entity performing the assessment. This applies equally to financial institutions that need to identify cases on a risk-based approach, as well as to FIUs that also rely on a risk-based approach, especially when it comes to prioritizing the Suspicious Activity Reports and Suspicious Transaction Reports (SAR/STR) they receive.

For the identification of these high-risk countries, FAST advocates for a point-scoring based on the analysis of national crime statistics on the nationality of identified offenders, nationality of identified victims, and countries from which victims have been repatriated to their home countries (Haberstroh & Zaugg, 2023). This allows for the best possible risk-based search for established transnational criminal structures based on the often very limited data available for these crimes. In a second step, the rankings formed in this way are merged for all countries from a specific world region, be it Central and South-Eastern Europe, East Asia and the Pacific, Eastern Europe and Central Asia, North Africa and the Middle East, North America with Central America and the Caribbean, South America, South Asia, Sub-Saharan Africa, and Western and Southern Europe (see table 1).[15]

[13] Legal framework elements, like lax customs law and controls, might be drivers for criminals choosing certain countries as transit points for their trafficking crimes. When assessing the trafficking-specific risks of such countries, legal and institutional aspects may therefore need to be given greater consideration.

[14] These countries are the most mentioned by Country Reports attached to the 2022 UNODC Trafficking in Persons Report as place of origin of perpetrators, place of origin of victims, and/or country from where victims were repatriated. 17 country reports mention China, 15 country reports mention Nigeria, 14 country reports mention Romania, 11 country reports mention the Philippines, and 9 country reports mention Venezuela (Bolivarian Republic of).

[15] The division into said regions follows the structure reflected in UNODC, 2023a, and its attached country reports.

Table 1- Modern Slavery/Human Trafficking-relevant Countries per Region identified by FAST[16]

Geographical Region in which the Offences were Recorded (*Location of Monitoring Financial Institution*)	**Typical Countries of Origin of Perpetrators and/or Victims (*Countries/Nationalities under increased Monitoring*)**
Central and South-Eastern Europe[17]	China, Germany, Italy, Romania, United Kingdom of Great Britain and Northern Ireland
East Asia and the Pacific[18]	Bangladesh, China, Malaysia, Philippines, Thailand
Eastern Europe and Central Asia[19]	Brazil, the Czech Republic, Germany, Poland, Uzbekistan
North Africa and the Middle East[20]	Bangladesh, Ethiopia, Lebanon, Pakistan, Syrian Arab Republic
North America with Central America and the Caribbean[21]	Colombia, Guatemala, Honduras, Nicaragua, Venezuela (Bolivarian Republic of)
South America[22]	Argentina, Colombia, Ecuador, Peru. Venezuela (Bolivarian Republic of)
South Asia[23]	Bangladesh, India, Nepal, Pakistan, Saudi Arabia
Sub-Saharan Africa[24]	Benin, Democratic Republic of the Congo, Lebanon, Mali, Nigeria
Western and Southern Europe[25]	Brazil, Bulgaria, China, Nigeria, Romania

The fact that the case numbers of all countries within the respective regions are not simply added to obtain a regional ranking, as is done on an individual country level, is because the scope and data quality on human trafficking investigations shows significant differences between states. Many countries do not report on the nationalities of traffickers and victims, or do not seem to have any statistics on trafficking cases at all. Adding the case numbers in all countries of a region up would therefore lead to an overweighting of the criminal realities of countries that invest more and/or compile the data on the results of their investigations more accurately. The chosen method of merging the different country ranking results to obtain a regional ranking, on the other hand, resembles more of drawing a sample of the human trafficking situation in different parts of the region, which, given the already-mentioned differences, seems to provide a more accurate picture of the criminological reality in the overall region assessed.

For financial institutions and FIUs from the many countries that do not statistically analyze corresponding data on the origin of offenders and victims at all, referring to these regional country rankings is the most reasonable approach they can take. This is true not least because international criminals tend to expand their existing criminal activities to neighboring countries, as the case of Nigerian human trafficking networks shows (Diehl, 2019). Likewise, for financial institutions that have access to national crime statistics, complementing the country-risk lists with information on regionally predominant offender and victim nationalities may be worth considering, as there is an increased likelihood of existing but as yet unrecognized relevant activity at the national level as well.

Of course, this form of regional evaluation is far from being a perfect approach and has weaknesses. For instance, it may lead to an overweighting of the criminal reality in small countries, although the absolute numbers of cases are potentially much smaller than in larger countries. However, until a sufficiently good and comparable level of

[16] Table extracted from Haberstroh & Zaugg, 2023, p. 9.
[17] The Central and South-Eastern Europe Region includes countries like Albania, Bulgaria, Croatia, Estonia, Hungary, Latvia, Poland, Romania, Serbia, and Slovenia.
[18] The East Asia and the Pacific Region includes countries like Australia, Cambodia, The People's Republic of China, Indonesia, Japan, Malaysia, Mongolia, Thailand, the Philippines, and Vanuatu.
[19] The Eastern Europe and Central Asia Region includes countries like Armenia, Azerbaijan, Belarus, Georgia, Kazakhstan, Kyrgyzstan, Republic of Moldova, Russian Federation, Tajikistan, and Ukraine.
[20] The North Africa and the Middle East Region includes countries like Algeria, Egypt, Iraq, Israel, the Kingdom of Saudi Arabia, Lebanon, Morocco, Sudan, the Syrian Arab Republic, and the United Arab Emirates.
[21] The North America, Central America, and the Caribbean Region includes countries like Bahamas, Canada, Costa Rica, Dominican Republic, Guatemala, Jamaica, Mexico, Panama, the Republic of Trinidad and Tobago, and the United States of America.
[22] The South America Region includes countries like Argentina, the Plurinational State of Bolivia, Brazil, Chile, Colombia, Ecuador, Guyana, Paraguay, Peru, and Uruguay.
[23] The South Asia region includes countries like Afghanistan, Bangladesh, Bhutan, India, Maldives, Nepal, Pakistan, and Sri Lanka.
[24] The Sub-Saharan Africa Region includes countries like Angola, Central African Republic, Chad, Kenya, Liberia, Mozambique, Namibia, Niger, Nigeria, and South Africa.
[25] The Western and Southern Europe Region includes countries like Austria, Finland, France, Germany, Italy, Malta, Spain, The Netherlands, Türkiye, and the United Kingdom of Great Britain and Northern Ireland.

trafficking investigations and corresponding data analysis is achieved globally, it appears to be the most accurate option that can be resorted to for the time being to enable risk-based monitoring of human trafficking crimes.

Risk-based transaction monitoring: Using trafficking-specific country risk ratings

For the identification of financial flows of trafficking crimes, at least the anti-human trafficking practice has shown that combining money laundering indicators already used by financial institutions with crime-specific high-risk countries as an additional red flag, is a promising approach. This is especially the case when it comes to indicators used for the automated monitoring of relevant transactions. First, because the initiation of large-scale money laundering operations is more likely in locations where large amounts of illicit funds are initially generated. Second, because the financial industry's appetite for introducing trafficking-specific compliance is greater when the implementation effort and associated costs are moderate. Third, and finally, because the transaction patterns of predicate offense transactions, at least in the area of human trafficking and modern slavery, often correspond to the transaction patterns of money laundering activities that are already subject to scrutiny and enhanced monitoring efforts.

A particularly relevant example of transaction patterns potentially relating to money laundering and human trafficking are cases in which several actors transfer equal or similar amounts of money to one account from where, within a short period of time, the total amount is forwarded to a third account. This corresponds to well-known money laundering practices, in which illegal funds are channeled through accounts, which are also used for legal purposes, in order to disguise their illicit nature. However, the same transaction pattern can also be found in human trafficking and exploitation. This is the case, for example, when several forced laborers transfer identical usurious rental amounts to the exploiting company in the context of debt-bondage schemes, or when forced prostitutes transfer their comparable earnings to their exploiters. The criminal recipient of the respective transactions, be it the exploiting company or the sex trafficker, then transfers the profits to the criminal actors in the background and/or initiates the money laundering process by transferring the total amounts received to a third account.

Therefore, if the transaction monitoring indicator, in addition to the said channeling transaction pattern as such, requires involved parties to have the nationality from and/or reside in a trafficking high-risk country in order to generate an alert, it becomes more in line with the needs of an efficient monitoring of human trafficking activities.

A recent pilot testing of the FAST concept with several financial institutions from an EU-country indicated that the implementation of such a high-risk country-enhanced channeling indicator led within a short time to the submission of a SAR/STR on forced labor by a bank located in the EU. Another bank from the same EU-Country (Country A) uncovered a transaction network involving multiple members with nationality from the Southeast Asian Country B, classified as a high-risk human trafficking country according to the risk classification system explained before. In this specific case, a woman registered as unemployed with residence in A and nationality from B received a large number of round-sum transactions of between EUR 40 - 400 from more than 30 women with residence in A and nationality from B. The transactions were made without specifying the reasons for payment. Over a period of one year, EUR 91,000 were transferred to the woman's account. 75% of these funds were transferred from her account to the account of a male national from A. This is an indication of a criminal's salary or intermediary's remuneration corresponding to 25% of the ill-gotten proceeds. The recipient, in turn, transferred the money received to another account of his in a third EU country, Country C, in EUR 3000 tranches. To the best of the author's knowledge, the case is currently being investigated by the relevant authorities for the existence of a possible sex trafficking network.

Monitoring transaction channels: Tracking payment flows of trafficking crimes

Another risk-based country monitoring approach is the increased scrutiny of specific transaction channels, which are those between originators in specific locations to recipients in other specific locations. In contrast to the previously mentioned concept, the monitoring is not based on the unspecific presence of one or several trafficking high-risk countries, but on the increased monitoring of two third countries that have a special relationship with each other. In the case of human trafficking, these are those that can be considered as each other's typical source and/or destination countries of individuals trafficked. Financial transactions flowing from the destination country of the trafficked persons to the country of origin are monitored more closely to identify possible payment transactions for them.

This approach does not necessarily require the monitoring institution to be the account-holding bank of the originator or beneficiary of the transaction reviewed, nor that it must be in the same country as these account-holding institutions. Rather, it is also suitable for the monitoring of trafficking activities between third countries whose payment transactions are routed through the relevant institution in the context of correspondent banking and/or foreign currency clearing services.[26] Since most international transactions are executed in USD or EUR (SWIFT, 2015), especially larger correspondent banks in the US and EU can harvest this potential, as they usually serve as intermediaries in the execution of transactions and thereby also receive the payment order data, including information on the domiciles of the ordering party, the beneficiary and/or their respective account-holding banks. This enables risk-based monitoring of trafficking activities by financial institutions physically distant from the crime locations in which all forms of conspicuous transaction patterns occurring within these transaction channels are searched for, e.g., a repeated number of large and/or round-sum amounts being transferred.

However, the increased monitoring of transaction channels can also be linked to specific transaction pattern indicators whenever this reflects the transaction structure of a specific crime that has particularly strong links to that country. An example of this is the live streaming of child abuse acts already mentioned with their strong prevalence in the Philippines as a streaming country, and countries in the Global North as the typical locations of the consumers. To specifically search for this type of crime, FAST is advocating the use of the above-mentioned channeling indicator as a starting point and to additionally require that either the recipient of the numerous individual transactions or the downstream recipient of the total amount be located in the Philippines (Haberstroh & Zaugg, 2023). Through this, situations shall be addressed in which several criminal spectators pay the same fee to access the live broadcast, the sum of which is then sent either directly or through an intermediary to the perpetrators in the Philippines.

Major international banks within the EFIPPP that have used the indicator have been able to identify and report conspicuous transactions. Prior to this, in a more manual evaluation within the AFCA project work, relevant cases were also identified by focusing on the Philippines as a recipient country. In one case, for example, the behavior of a German man in his fifties was reported, who had made several small payments to an adult woman in the Philippines. The transactions were for purposes such as "Happy Birthday," although no obvious relationship to the beneficiary was apparent. Both are known red flags for the existence of financial transactions involving the online sexual abuse of children (AUSTRAC, 2019; FINTRAC, 2020). The in-depth investigation within the bank revealed that the client had also made payments to a service provider specialized in processing payments for online businesses providing VPN[27] and other cyber anonymity services. Furthermore, cash withdrawals from the client's account in Thailand, another high-risk country for child sexual abuse, were determined. Finally, a YouTube channel of the beneficiary in the Philippines was found, who stated in another social media platform that she was a waitress. The videos uploaded were exclusively of different sleeping children filmed from the side, for which there was no plausible explanation, and which were perceived by viewers as inappropriate.

Monitoring high-risk cities and regions: Sharpening the risk-based approach

The finding that certain countries have higher specific crime risks than others can, of course, also be further pinpointed to the level of certain regions and/or cities that are particularly affected by the crime in question. While in the case of money laundering, the risk drivers are mostly uniform across the country due to their legal and institutional nature, meaning that regional or local differences in risk are likely to be less pronounced, this may be considerably different for the factual and/or logistical risk drivers of trafficking crimes.[28] One only has to think of border regions at which the border crossings relevant for many trafficking crimes take place, port cities and free trade zones in which trafficked people or goods are transshipped, or regions controlled by organized criminals, militias, or terrorists involved in trafficking crimes.[29] Focusing on such regions and localities is therefore a logical consequence of the risk-based approach.

Increased monitoring of regions or cities can also be done through transaction channel monitoring described before, whenever there is knowledge that certain regions or cities to be particularly frequent source or destination locations of trafficking crimes. In the case of human trafficking, numerous such city- or region-specific trafficking

[26] The European Central Bank defines correspondent banking as "agreements of contractual relationships to provide payment services for each other" (ECB, 2015). Such services may include, in particular, the routing of transactions to third-party banks with which the originating bank does not have a direct business relationship, or the execution of transactions in the home currency of the intermediary institution (the mentioned "currency clearing").

[27] A virtual private network (VPN) is an encrypted connection from a device to a network, which hides the user's IP address. Whilst a VPN can serve legitimate privacy and data security interests, it can also be used by criminals to operate anonymously in the cyberspace.

[28] Exceptions of the nationwide uniform money laundering risk may of course exist whenever a country is federally organized and money laundering relevant legislation, i.e., corporate secrecy laws, differ considerably between federal states.

[29] Regional and/or citiy specific risks may also be identifiable for other trafficking crimes, e.g., in the case of archaeological cultural sites and national parks, which represent only a small part of the national territory but are the sole place of origin of all cultural goods and wildlife trafficked from the relevant country.

channels are known and can thus become the subject of enhanced monitoring. FAST has identified 140 transaction channels based on information on specific cities as origins and/or destinations of trafficking routes, which can be found mainly in UNODC and IOM reports (Haberstroh & Zaugg, 2023).[30] One is for transactions from originators with addresses in Italy to recipients with addresses in Benin City, the capital of Edo State, Nigeria. The population of Edo is particularly affected by human trafficking of Nigerian nationals, and Italy has been an established market for such trafficking for several decades (Kawar, 2015).

The Nigerian Financial Intelligence Unit (NFIU) therefore systematically screens incoming Suspicious Transaction Reports for those in which the payee is in Edo and the originator is from a country identified by Nigerian authorities as a high-risk country for human trafficking, including Italy. Transactions involving Iraq and Lebanon are also considered relevant. The latter is also indicated by the FAST Initiative as a high-risk country for the entire sub-Saharan region. Transactions flagged in this way by the NFIU are further investigated and referred to Nigeria's National Agency for the Prohibition of Trafficking in Persons (NAPTIP), which has made the integration and request for financial intelligence part of its anti-human trafficking work (GIABA, 2021). It is worth noting that cases identified in this way, which have a particularly high number of additional indicators of human trafficking, follow transaction patterns in which multiple transactions from different originators are received in a single account, from which the sum is transferred to a third-party account shortly thereafter. A transaction pattern that strongly resembles the case described above in the EU involving Southeast Asian actors and that could therefore be a potential typology for trafficking-related financial flows globally.

Monitoring of trafficking routes: Search for financial activities linked to criminal logistics

The location-based monitoring approaches described before focus almost exclusively on the places of origin and/or destinations of trafficking victims. However, trafficking crimes are also typically characterized by the element of transporting the victims or goods between these two endpoints. The considerable logistical complexity of transporting drugs, weapons, persons and other illicit goods from their place of origin to their final destination, has led to established criminal infrastructures, including permanent warehouses and safe-havens, cooperation with cross-border smugglers and other criminal service providers, as well as officers in key positions on the payroll of organized crime.

It is therefore not surprising that well-defined trafficking routes have emerged, in which not only different trafficking crimes occur, but also different illegal goods are transported together to shared destinations (Jacobson & Daurora, 2014). Due to the considerable and diverse criminal activities along these trafficking routes, an increased volume of relevant illicit transactions can be expected, be it as payment for the trafficking activities and criminal services, or to forward profits already generated along the illicit trade chain to the actors behind the scenes.

Risk-based monitoring of conspicuous transactions along such trafficking routes, especially those that are similar in terms of transaction parties and/or transaction structures, can therefore provide valuable indications of potentially existing criminal structures. In the context of AFCA's project work, a focus was placed on a route in southern Chad that serves as a known trafficking link between East Africa and the territories of terrorist organizations and militias in the Lake Chad region, the trans-Saharan route to Europe, and illegal sales markets in West Africa alike. In addition to human trafficking, the route shows a particularly high prevalence of small arms trafficking activities. It is also known for the fact that both legal and illegal trafficking activities happening on it are subject to informal taxation by militias (Africa Center for Strategic Studies, 2017).

A bank involved in the project was able to identify several round EUR amounts sent by three companies in different Chadian localities on this route, namely N'Djamena, Mongo, and Abeche, to a company in the United Arab Emirates (UAE). The sum of the said transactions totaled over half a million EUR in two months. The bank was able to identify the transactions as it was the EUR currency clearer acting between the ordering bank in Tchad and the beneficiary's bank in UAE. The Requests for Information sent by the bank to the account-holding bank in Chad revealed that the three companies were unrelated one-person businesses that declared to have bought fabric from Dubai they intended to sell as traditional clothing. In fact, the beneficiary company was identified as a small fabric business. However, requested commercial and customs documents showed clear signs of forgery. In addition, the reported costs and quantities of the purchased fabric were not economically plausible in relation to the number of potential end-customers and average per capita monthly income in the region. Finally, the

[30] The 140 channels consist of 97 city-to-city transaction channels (pp. 19-24) and 43 country-to-city transaction channels (pp. 24-26).

purchasing companies turned out to be 6 sq. m. large market stalls without storage space, which could not have stocked the specified quantities of goods for reasons of space alone.

It was also noticeable that the beneficiary company had two bank accounts in two different banks in the UAE. During the two-month observation period, the amounts of the individual transfers of the different companies, which were officially not connected with each other in any way, showed parallels that can hardly be regarded coincidental and indicate a structured and centrally controlled operation.

Four transactions totaling EUR 252,750 were transferred from the account of Market Stall 1 in N'Djamena to the beneficiary's account at UAE Bank A. The individual transactions were made in amounts of EUR 70,000, EUR 70,300, EUR 50,000, and EUR 62,450. In the same period, Market Stall 2 and Market Stall 3 transferred five transactions totaling EUR 256,000 to the recipient's other account at UAE Bank B. Market Stand 2 made a one-time transfer of EUR 70,000. Market Stand 3 carried out four transactions in the amounts of EUR 70,000, EUR 50,000, EUR 26,000, and EUR 40,000 (see table 2).

Table 2 –Chad Trafficking Route Case Transaction Overview

Payments to Beneficiary Account with UAE Bank A	**Payments to Beneficiary Account with UAE Bank B**
EUR 70,000 by Market Stand 1 ***EUR 70,300*** by Market Stand 1 ***EUR 50,000*** by Market Stand 1 ***EUR 62,450*** by Market Stand 1	***EUR 70,000*** by Market Stand 2 ***EUR 70,000*** by Market Stand 3 ***EUR 50,000*** by Market Stand 3 ***EUR 66,000*** by Market Stand 3 (EUR 26,000 + EUR 40,000)
Total Account A (June/July): ***EUR 252,750***	Total Account B (June/July): ***EUR 256,000***
Total in both accounts of the beneficiary (June/July): ***EUR 507,750***	

While there is little doubt that these transactions represent the money movements of a criminal network, the author has no knowledge of whether the reported transactions have been further investigated by the competent authorities, nor of the exact criminal activities that underlie them. Money laundering of the direct profits from trafficking crimes, such as human trafficking or arms trafficking, or the concealment of revenues from informal taxes on both legal and illegal trade levied by militias/terrorist organizations in order to finance the corresponding groups, seems, nevertheless, to be the most likely options. However, regardless of the exact background, the case shows that targeted monitoring of known trafficking routes has great potential to uncover trafficking activities in all its forms, as well as associated money laundering operations.

Concepts for more targeted searches for human trafficking activities along such trafficking routes are nevertheless necessary and currently under development. Within the EFIPPP, for example, an approach initially developed and presented by EFIPPP's Threats and Typologies Workstream lead, Jürgen Repolusk, is being tested and further developed. The proposed approach looks at the conspicuous use of credit cards along trafficking routes using various parameters, including the time of the transactions. A central parameter of it is the automatic evaluation of the business fields/industries to which the counterparties of the corresponding transactions belong. Unlike wire transfer transaction data, credit card transaction data contains so-called merchant codes, which indicate the business/industry of the merchant in a uniform code form suitable for automated screening. In this way, it is thus possible to systematically screen for transaction patterns involving payments for car rentals, fuel stations, harbors, hotels, and/or toll fees, that occur during night hours on known trafficking routes. Again, another example that illustrates not only the great potential of location-based monitoring of trafficking activities, and how these techniques are constantly enhanced, but also the importance of PPPs in developing them.

Final Considerations

Much is happening in the field of identification and detection of trafficking and exploitative crimes through the monitoring and analysis of the financial flows that accompany them. Current innovative practice recognizes that when it comes to creating financial intelligence, the internationality and high degree of organization of the actors involved, otherwise considered as major challenges in the fight against organized crime, can become the elements that make it possible to efficiently identify relevant behavior via automated transaction monitoring. Thus, internationality goes hand in hand with several concrete country references that can be the subject of risk-based considerations, while the organization and professionalization of criminal actors result in repetitive patterns of behavior that can be made the object of targeted monitoring efforts.

In all this, financial intelligence does not merely serve as a supplementary investigative tool. Rather, it can be the starting point for the initiation of criminal investigations in cases where, for instance, the fear of retaliation by organized criminal groups results in a lack of reporting parties and witnesses. An aspect that takes on particular weight in the crime of human trafficking and modern slavery, where victims are subjected to extreme threats and violence. At the same time, it can also become crucial evidence in criminal proceedings to prove the involvement of a wide variety of actors in the crimes being prosecuted. When all is said and done, money is what drives the organized criminals behind all trafficking crimes.

However, the targeted search for trafficking-related financial flows is not only useful in combating the underlying crimes. The money generated from these activities through organized crime also constitutes one of the main sources of the international money laundering apparatus. Therefore, if one starts with the large sources of income and follows the transaction flows that originate from them, one will sooner or later come across those who have the capacity and the organizational capacity to conceal such sums of money; the "big fish" of money laundering, who particularly damage the integrity of financial markets and serve as enablers of criminality all over the world.

For this to succeed, the relevant players must work together to share their know-how and develop innovative approaches to combat this criminal activity. Private-public partnerships between the financial industry, FIUs, law enforcement agencies and other governmental and supranational actors are the most fruitful basis for such cooperation. What has been achieved in recent years by such groups in the area of risk-based monitoring of high-risk countries, regions and cities alone is remarkable and gives hope that the global anti-financial crime community is moving in the right direction.

However, evaluating the effectiveness of the measures remains a challenge. Financial institutions keep their SARs/STRs confidential. FIUs cannot disclose information about ongoing investigations. Court rulings, finally, will rarely include information on whether the case was initially reported by a financial institution as a SAR/STR. This makes the study of information regarding the individual links in the anti-financial crime investigation chain challenging, the evaluation of the efficiency of the tools through the entire chain difficult, and the systematic identification of trends by academia almost impossible.

Yet, scientifically based findings and accurate data are of utmost importance, especially for the automated transaction monitoring of trafficking crimes. If one wants to filter out the most relevant cases from the millions of transactions flowing through a financial institution on a risk-based approach, one relies on the most accurate, diverse and up-to-date data that can be used to refine transaction monitoring algorithms. This is especially true for trafficking specific transaction typologies, for which there is so far only preliminary emerging evidence, as is the case for the channeling pattern described above, identified in several places around the world to be linked to human trafficking, modern slavery, and the online sexual exploitation of children.

The author therefore encourages PPPs around the world to open their doors to academic and research institutions, and likewise calls on academia to approach such organizations, in order to join forces in the fight against trafficking crimes and related money laundering activities. Empirical research on relevant locations and their specific risks can increase the effectiveness of monitoring techniques. In addition, further innovative approaches need to be developed, as only a holistic and multifaceted monitoring concept will achieve long-term results in the fight against these heinous crimes. So, let's get to work.

Declarations

Promoting financial industry related anti-human trafficking measures and respective public-private partnerships are project goals of UNU-CPR's FAST Project. The views and opinions expressed in this paper do, nevertheless, not necessarily reflect the official policy or position of the United Nations University.

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