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# **Financial Exploitation:** Collecting Meaningful Data

# Financial Exploitation: Suggested Data Points

The vast majority of modern slavery and human trafficking cases involve interaction with finance in some form. In many cases, traffickers exploit their victims financially, taking control of their bank accounts, confiscating wages, and using debt as a means of control. Criminals must launder the funds that they generate through their activities and may use their victims to hide the funds and make transfers on their behalf. There are also certain payments for goods or services made during the course of business for traffickers that may indicate nefarious activity is occurring.

NGOs, law enforcement officials and frontline services have direct interaction with cases of exploitation, gathering information from victims and traffickers. They have access to information that may be crucial in understanding how each case has interacted with the finance world. On the other hand, financial service providers and investigators are keen to understand how they can better detect exploitation and abuse using red flags and indicators. The collection and sharing of key data points, anonymised where necessary, can be crucial in developing our collective response and preventative activities against criminal exploitation.

The following is a suggested list of data points that serve to extract useful information from human trafficking cases as they relate to finance, presented in such a way that can better equip law enforcement and financial services to detect and prevent future cases of exploitation.



# Victim's Accounts:

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## 1. Did the victim have a bank account and/or credit card under their name during the period in which they were exploited?

If yes:

- A. Which bank or financial service provider was this account maintained by?
- B. What was the type of account? (e.g. checking account, personal account, credit card account, savings account)
- C. Did the victim sign any paperwork related to this account?
- D. If so, was it in a language that they do not understand?
- E. Did the victim provide any information to the bank during the account opening process that they knew to be incorrect? What was this? Who asked them to provide this information?
- F. Was the victim accompanied into a branch to open their bank account? (This person may have posed as an interpreter or handler.)
- G. Can the victim identify who this person/handler was?
- H. Did the victim always have access to and control over their own personal ATM cards and PIN? If not, who had them?
- I. Was the victim required to hand over any access to their bank account to another party during the period of exploitation? If so, who was this person?
- J. Was the victim ever forced or coerced into using their account to process funds for a third party? If so, who was this person?
- K. Was the victim's bank account used to make transactions for any of the financial aspects of their exploitation? (e.g. paying excessive/illegal recruitment fees)
- L. Where were these transactions made?
- M. Was the victim's bank account ever used as a pass-through for money that they did not know the origin/purpose for? If so, who was this for?

## 2. Was the victim in personal debt when they entered into the trafficking situation?

If yes:

- A. What was the amount of this debt?
- B. How did this debt occur? (e.g. loan to pay recruitment fees, living expenses, hospital fees)
- C. Who owned this debt? (e.g. bank, family member, unregulated lender)
- D. What was the person told about the debt? Was it accurate?

### 3. Did the victim fall into further (or new) personal debt during the period of exploitation?

If yes:

- A. What was the amount of this debt?
- B. How did this debt occur? (e.g. loan to pay recruitment fees, living expenses, hospital fees)
- C. Who owned this debt? (e.g. bank, family member, unregulated lender)
- D. Were there threats or intimidation associated with the repayment process? If so, by whom?

## Trafficker's Accounts

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### 1. Did the trafficker have a bank account and/or credit card under their name during the period in which they were exploited?

If yes:

- A. Which bank or financial service provider was this account maintained by?
- B. What was the type of account? (e.g. business account, personal account, credit card account)
- C. What industry did the trafficker operate in?
- D. Which country or countries did the trafficker have a bank account(s) in?
- E. Did the trafficker use this account to process funds generated through their crimes?

### 2. Did the trafficker use any websites or payment apps to take payments as part of their illegal operations? (e.g. business website, posting classified ads online)

If yes:

- A. What was the website/app name?
- B. What kind of currency/channels does the website accept as payment? (e.g. VISA, Mastercard, Cryptocurrency, PayPal)
- C. What services was the website used to take payments for? (e.g. food, transportation, health, clothing, makeup)
- D. What identifying information can be found on this website/app related to the trafficker/victim? (e.g. phone numbers, bank information, addresses)

# Money Movement

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## 1. Did the victim make any money remittances during the period of exploitation?

If yes:

- A. What was the purpose of these remittances?
- B. Was the victim ever asked/forced to make remittances that they did not know the purpose of? If so, by whom.
- C. What bank/financial service provider/convenience store was used to send/receive the funds?
- D. Which bank account (details if available, i.e. company or individual) were the funds sent to?
- E. Between which countries was the money sent?
- F. What was the purpose that the victim provided to the remittance agency, if any, of the money being sent? (e.g. loan repayment)

## 2. Was the victim required to pay fees to the trafficker as part of their exploitation journey?

If yes:

- A. What was the purpose of these fees? (e.g. recruitment, travel)
- B. Were these fees illegal?
- C. What was the amount of the fees?
- D. How was the payment for these fees made?

## 3. Was the victim paid a salary during the period of exploitation?

If yes:

- A. How was this payment made and how much/how frequently?
- B. Was all or part of their salary taken from them?
- C. If so, how did this occur?
- D. Was this the amount promised when they were recruited?

**4. Was the victim at any time required to carry or conceal cash on behalf of the trafficker?**

If yes:

- A. How much cash?
- B. What was the source of the cash?
- C. Was the victim asked to deposit the cash into a bank account?
- D. If so, which bank and whose account (if known) was the cash deposited into?

**5. Was the victim aware of alternative currencies besides cash, such as cryptocurrency, being used at any point during the period of exploitation?**

If yes:

- A. What currencies were mentioned/witnessed being used? (e.g. Bitcoin)
- B. How were these currencies used? (e.g. as payment for services, for money laundering purposes)

**6. Was the victim ever forced to move drugs, counterfeit goods or other illegal goods?**

If yes:

- A. What illegal goods were they required to move?
- B. Between which countries/locations did they move the goods?
- C. Were they required to handle any cash/payment related to these goods?
- D. Did they know they were moving illegal goods?


**7. Did the victim witness any other people moving/handling illegal goods or large amounts of cash during their exploitation?**

If yes:

- A. What was being moved?
- B. What information can the victim provide about the people involved and the nature of the crime?




Contact us at:

 [info@themekongclub.org](mailto:info@themekongclub.org)

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