Financial Investigations

Step-by-Step Guide to Financial Investigations Related to Trafficking in Human Beings (THB) & Recommendations

1. Centralize Oversight
   - LEA (Law Enforcement Agency)
   - FIU (Financial Intelligence Unit)

2. Define Roles and Responsibilities
   - LEA
   - FIU

3. Access Appropriate Investigatory Resource
   - LEA
   - FIU

4. Evaluate the Investigation for THB Activity
   - LEA

5. Scope the Investigation and Identify Target Subjects
   - LEA

6. Identify and Leverage Indicators and Red Flags
   - FIU

7. Report Suspicious Behaviour
   - LEA

8. De-Risk Relationships
   - FIU

9. Extract intelligence from Compiled (and Proven) THB Investigations
   - FIU

10. Coordinate with External Partners (Public/Private Partnerships)
    - FIU

11. Financial Access — Banking Survivors of THB
    - FIU

RECOMMENDATIONS

Contextual Information: establish a foundational definition of THB based on international law, include gender-disaggregated, geography-specific data and work towards the development of robust financial intelligence to identify Suspicious Activity Reports (SARs).

Financial Indicator Development: prioritize indicators specific to THB, rate them according to effectiveness and group them according to: Behaviours; Know Your Customer (KYC); and Transactions.

Operational Aspects: compile all indicators into one easy-to-access document, create keywords to be used in SARs and collect resources specifically on the topic of THB.