

January is Human Trafficking Awareness Month

Who is Most Vulnerable?

Anyone can experience trafficking in any community, just as anyone can be the victim of any kind of crime. While it can happen to anyone, evidence suggests that people of color and LGBTQ+ people are more likely to experience trafficking than other demographic groups. Generational trauma, historic oppression, discrimination, and other societal factors and inequities create community-wide vulnerabilities. Traffickers recognize and take advantage of people who are vulnerable.

People may be vulnerable to trafficking if they:

- Have an unstable living situation
- Have previously experienced other forms of violence such as sexual abuse or domestic violence
- Have run away or are involved in the juvenile justice or child welfare system
- Are undocumented immigrants
- Are facing poverty or economic need
- Have a caregiver or family member who has a substance use issue
- Are addicted to drugs or alcohol

Who Are the Traffickers

There is no evidence that traffickers are more likely to be of a particular race, nationality, gender, or sexual orientation. They may be family members, romantic partners, acquaintances, or strangers.

How Traffickers Lure People In

Stories become weapons in the hands of human traffickers — tales of romantic love everlasting or about good jobs and fair wages just over the horizon. Sometimes, the stories themselves raise red flags. Other times, traffickers or potential traffickers may raise red flags during recruitment.

Here are a few situations that might raise concerns:

- A would-be employer refuses to give workers a signed contract or asks them to sign a contract in a language they can't read.
- A would-be employer collects fees from a potential worker for the "opportunity" to work in a particular job.
- A friend, family member, co-worker, or student is newly showered with gifts or money or otherwise becomes involved in an overwhelming, fast-moving, and asymmetric (e.g., large difference in age or financial status) romantic relationship.
- A friend, family member, or student is a frequent runaway and may be staying with someone who is not their parent or guardian.
- A family member, friend, co-worker, or student is developing a relationship that seems too close with someone they know solely on social media.
- A family member, friend, or student lives with a parent or guardian and shows signs of abuse.

- A family member, friend, or co-worker is offered a job opportunity that seems too good to be true.
- A family member, friend, or co-worker is recruited for an opportunity that requires them to move far away, but their recruiter or prospective employer avoids answering their questions or is reluctant to provide detailed information about the job.

Recognizing Labor Trafficking

Labor trafficking includes situations where men, women, and children are forced to work because of debt, immigration status, threats and violence. Keeping victims isolated — physically or emotionally — is a key method of control in most labor trafficking situations. But that does not mean you never cross paths with someone who is experiencing trafficking.

Someone may be experiencing labor trafficking or exploitation if they:

- Feel pressured by their employer to stay in a job or situation they want to leave
- Owe money to an employer or recruiter or are not being paid what they were promised or are owed
- Do not have control of their passport or other identity documents
- Are living and working in isolated conditions, largely cut off from interaction with others or support systems
- Appear to be monitored by another person when talking or interacting with others
- Are being threatened by their boss with deportation or other harm
- Are working in dangerous conditions without proper safety gear, training, adequate breaks, or other protections
- Are living in dangerous, overcrowded, or inhumane conditions provided by an employer

Recognizing Sex Trafficking

Sex trafficking occurs when individuals are made to perform commercial sex through the use of force, fraud, or coercion. Any child under 18 who is involved in commercial sex is legally a victim of trafficking, regardless of whether there is a third party involved.

Someone may be experiencing sex trafficking if they:

- Want to stop participating in commercial sex but feel scared or unable to leave the situation.
- Disclose that they were reluctant to engage in commercial sex but that someone pressured them into it.
- Live where they work or are transported by guards between home and workplace.
- Are children who live with or are dependent on a family member with a substance use problem or who is abusive.
- Have a “pimp” or “manager” in the commercial sex industry.
- Work in an industry where it may be common to be pressured into performing sex acts for money, such as a strip club, illicit cantina, go-go bar, or illicit massage business.
- Have a controlling parent, guardian, romantic partner, or “sponsor” who will not allow them to meet or speak with anyone alone or who monitors their movements, spending, or communications.

Human trafficking is often "hidden in plain sight." Recognizing the signs is the first step in identifying victims. No single indicator is proof that human trafficking is occurring. The indicators listed below are a few examples that may alert you to a potential human trafficking situation: **WORK CONDITIONS** Does the potential victim: • Experience verbal or physical abuse (particularly from a supervisor), prevented from taking adequate breaks, made to work in unsafe conditions, or forced to meet daily quotas? • Work excessively long and/or unusual hours? • Accept a specific job but feels coerced or forced into a different job? • Appear to be living at his or her place of work? • Receive paychecks with negative balances or unreasonably low amounts for the pay period.

Victim indicators

Knowing the possible victim signs for those who may come into your financial institution is also important, particularly for front line staff. The DHS lists several indicators to be aware of, such as:

- Those accompanied by a controlling person or boss (e.g., perhaps not speaking on their own behalf)
- Lack of control over personal schedule, money, I.D., travel documents
- Transported to or from work, or lives and works in the same place
- Debt owed to employer/crew leader, and inability to leave job
- Bruises, depression, fear, overly submissive
- A juvenile engaged in commercial sex acts

What guidance do financial institutions have?

Human traffickers go to great lengths to keep their victims in the shadows, so it's possible that trafficking may never be visible in plain sight. However, financial institution staff are in a unique position to observe customers when interacting with them, and to detect and report suspicious financial activity that might be related to human trafficking. In addition, there are certain transaction indicators that AML professionals can monitor and, when spotted, report.

Specifically, in 2014, the Financial Crimes Enforcement Network issued advisory [FIN-2014-A008](#), providing the red flags for financial institutions to identify possible human trafficking. This advisory should be used for your AML policies and procedures, training and customization of your AML monitoring system, which can detect important red flags.