

# Coverage of Modern Slavery and Human Trafficking in National Risk Assessments within Sub-Saharan Africa

Research Report, March 2023

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**CPR**



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# Executive Summary

According to the 2021 Global Estimates published by the International Labour Organization (ILO), Walk Free, and the International Organization for Migration (IOM),<sup>1</sup> 49.6 million people are in situations of modern slavery on a daily basis. This translates to one in every 150 people across the world being subject to human trafficking and modern slavery (HT/MS). The Global Organized Crime Index 2021, published by the Global Initiative Against Transnational Crime,<sup>2</sup> refers to human trafficking as “the most pervasive of criminal markets,” which is almost a ubiquitous market to varying degrees across jurisdictions.

According to figures reported in the Global Estimates,<sup>3</sup> around 7 million people live in conditions of HT/MS in Africa – 3.8 million in conditions of forced labour and 3.2 million in forced marriages. However, the number of persons from Africa trafficked to different regions across the world is much higher. The United Nations Office on Drugs and Crime (UNODC) reports that “trafficking flows out of sub-Saharan Africa have a global dimension, with victims detected in Western and Southern Europe, North Africa, the Middle East, East Asia, and North America.”<sup>4</sup> Desperate socioeconomic conditions, poverty, high unemployment, demand for cheap labour, mass displacement, conflict, crime, and corruption are some of the key factors contributing to the scourge of HT/MS.

A National Risk Assessment (NRA) serves as a critical step to assist countries and financial institutions to better understand the nature of money laundering risks and typologies associated with HT/MS, and to inform its response strategy and resource prioritization. It serves as a foundational step towards an effective strategy and risk-based approach. As a baseline exercise, selected data from Sub-Saharan countries was analyzed to identify, assess, and understand how NRAs address HT/MS risk.

## Summary of key findings:

- Seventy nine per cent of countries within sub-Saharan Africa – 38 out of 48 – have conducted NRAs, although the nature, depth, and periods of

the assessments vary. NRAs of 31 countries were completed, adopted, or published during or after 2018.

- There was no information found in the public domain to confirm the existence of NRAs for 10 countries – 21 per cent of the base.
- Whilst NRAs are in place in 38 jurisdictions in Sub-Saharan Africa, HT/MS was mentioned in relation to the NRAs of 36 countries – 95 per cent of this base.
- Twenty-two Sub-Saharan countries – 58 per cent – with completed or draft NRAs, did not rate the level of HT/MS risk. Failure to assess the level of risk is potentially due to the countries not being aware of the extent of the problem, lack of capacity to respond appropriately, or other crimes such as corruption and drug trafficking being considered as more relevant.
- Sixteen countries rated the level of HT/MS risk: five countries rated HT/MS risk as High, two Medium-High risk, four Medium risk, four Medium-Low risk, and one Low risk.
- Sixteen countries – 42 per cent – discussed HT/MS at a cursory level. The countries either mention HT/MS in the form of text, legislation, or in a table without providing in-depth detail.
- Twenty countries – 53 per cent – mentioned HT/MS in detail. The countries falling within this category did not only make factual assertions but gave context around the nature and extent of HT/MS risk, the profile of the perpetrators and victims, as well as some form of statistical data.
- Most NRAs did not provide comprehensive statistics of HT/MS as a predicate offence or money laundering relating to human trafficking. The data provided indicated low prosecution rates and confiscations. Of the 16 countries that rated HT/MS risk, 88 per cent recorded the number of investigations and 75 per cent recorded

1 International Labour Organization, Walk Free and International Organization for Migration, *Global Estimates of Modern Slavery, Forced Labor, and Forced Marriages* (Geneva: ILO Publications, 2022), p. 2.

2 Global Initiative Against Transnational Organized Crime, *Global Organized Crime Index 2021* (Geneva: GI-TOC Publications, 2021).

3 International Labour Organisation, Walk Free and International Organization for Migration, *Global Estimates of Modern Slavery, Forced Labor, and Forced Marriages* (Geneva: ILO Publications, 2022), p. 3.

4 UNODC, *Global Report on Trafficking in Persons* (New York: United Nations, 2022), p. 165.

the number of prosecutions. However, there were few convictions and confiscations noted. Notwithstanding, a few good examples were identified.

**Recommendations (for governments, financial intelligence units, relevant regulatory agencies, law enforcement agencies, and financial institutions):**

- Promote platforms to share lessons and best practices across Sub-Saharan Africa.
- Entrench NRAs as a foundational tool to identify, assess, and understand HT/MS risks and to inform response strategies and resource prioritization.
- Adopt an agile approach to NRA processes.
- Prioritize the development of typologies and red flags.
- Ensure the availability of comprehensive statistical data.
- Drive timely and effective information sharing, coordination, and cooperation.
- Interrupt the money flow by leveraging collaboration platforms.

# Definitions

<b>AML</b>	Anti-Money Laundering	<b>NICTIP</b>	National Inter-Sectoral Committee on Trafficking in Persons
<b>CFT</b>	Combatting the Financing of Terrorism	<b>NGO</b>	Non-governmental Organization
<b>DNFBP</b>	Designated Non-Financial Businesses and Professions	<b>NPA</b>	National Prosecuting Authority
<b>DPCI</b>	Directorate for Priority Crime Investigation	<b>NRA</b>	National Risk Assessment
<b>ESAAMLG</b>	Eastern and Southern Africa Anti-Money Laundering Group	<b>OSCE</b>	Organisation for Security and Co-operation in Europe
<b>EWG</b>	Expert Working Group	<b>RUSI</b>	Royal United Services Institute
<b>FAST</b>	Finance against Slavery and Trafficking, a program managed by the United Nations University Centre for Policy Research	<b>SAMLIT</b>	South African Anti-Money Laundering Integrated Task Force
<b>FIC</b>	Financial Intelligence Centre	<b>SAR</b>	Suspicious Activity Report
<b>FIU</b>	Financial Intelligence Unit	<b>SDG</b>	Sustainable Development Goals
<b>GABAC</b>	Groupe d'Action contre le blanchiment d'Argent en Afrique Centrale – Task Force on Money Laundering in Central Africa	<b>STR</b>	Suspicious Transaction Report
<b>GIABA</b>	Inter-Governmental Action Group Against Money Laundering in Western Africa	<b>TIP</b>	Trafficking in Persons
<b>GSI</b>	Global Slavery Index	<b>TF</b>	Terrorism Financing
<b>HT/MS</b>	Human Trafficking/Modern Slavery	<b>TOG</b>	Tactical Operations Group
<b>KYC</b>	Know Your Customer/Client	<b>UN</b>	United Nations
		<b>UNODC</b>	United Nations Office of Drugs and Crime
		<b>UNTOC</b>	United Nations Convention Against Transnational Organized Crime

# Introduction and Context

The Finance against Slavery and Trafficking Initiative<sup>5</sup> (FAST), based at the United Nations University Centre for Policy Research (UNU-CPR) in New York, organized its 2022 annual stakeholder conference in Cape Town, South Africa. It was held from 28 to 30 November 2022 and consisted of a number of different sessions. On 29 November, a session on National Risk Assessments (NRAs), with the title “Identifying Risk: The Role of National Risk Assessments,” was held. The NRA serves as a critical tool in a country’s process to identify, assess, and understand its financial crime risks and enables countries to prioritize and mobilize resources to combat Money Laundering and the Financing for Terrorism (ML/FT). NRAs also outline a country’s strategies to tackle these issues and provide useful input to Financial Institutions (FIs) and Designated Non-Financial Businesses and Professions (DNFBPs) in assessing their own risks. The session explored how NRAs could be used to comprehensively address human trafficking<sup>6</sup> and modern slavery (HT/MS), which comprises human trafficking, forced labour, and child labour. It provided an opportunity to hear from actors in the region addressing HT/MS, and discuss any barriers actors may face in incorporating HT/MS into their NRAs. This report aims to conduct an analysis of NRAs from countries in Sub-Saharan Africa and provide the panellists of the session, and FAST, with information on how NRAs in the region can analyse HT/MS-related ML/TF risks.

HT/MS is insidious and results in profound damage to victims, since it involves the “cruel subjugation of the human spirit.”<sup>7</sup> Due to its hidden nature, it may be daunting to investigate as it may occur across borders and cover wide geographic distances. The United Nations Department of Economic and Social Affairs, through the Sustainable Development Goals (SDGs), has set a goal (Target 8.7) which aims to:

“Take immediate and effective measures to eradicate forced labor, end modern slavery and human trafficking and secure the prohibition and elimination of the worst forms of child labor, including recruitment and use of child soldiers, and by 2025 end child labor in all its forms.”<sup>8</sup>

In adopting Target 8.7 of the SDGs, the global community has also committed to ending modern slavery universally by 2030. The United Nations General Assembly in November 2000 under resolution 55/25 also adopted the UN Protocol to Prevent, Suppress, and Punish Trafficking in Persons, as part of the UN Convention against Transnational Organized Crime. According to Article 3 of the UN Protocol, ‘Trafficking in persons’ is defined to mean:

The recruitment, transportation, transfer, harbouring or receipt of persons, by means of threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation. Exploitation shall include, at a minimum, the exploitation or the prostitution of others or other forms of sexual exploitation, forced labor or services, slavery, or practices similar to slavery, servitude or the removal of organs....<sup>9</sup>

It is reported that 190 countries, including 48 countries in Sub-Saharan Africa, have ratified the UN Convention against Transnational Organized Crime. As of 3 October 2022, only three Sub-Saharan African countries have not yet ratified the protocol: Somalia, South Sudan, and the Republic of Congo (Republic of Congo signed

5 “FAST Initiative,” Finance Against Slavery and Trafficking Initiative, last accessed on 10 February 2023, <https://www.fastinitiative.org>.

6 ‘Trafficking in persons’ and ‘human trafficking’ are used as interchangeable terms. UNODC, “University Module Series Trafficking in Persons & Smuggling of Migrants, Module 6: Defining the Concept of Trafficking in Persons,” UNODC, March 2019, <https://www.unodc.org/e4j/en/tip-and-som/module-6/key-issues/crime-of-trafficking-in-persons.html>.

7 The Honorable John Harrold Jeffery, South African Deputy Minister of Justice and Constitutional Development, MP, keynote address at a SADC Regional Prosecutors Meeting hosted by UNODC, Kempton Park, 22 March 2022.

8 “Sustainable Development Goals”, UNODC Regional Office for Southeast Asia and the Pacific, last accessed 10 February 23, <https://www.unodc.org/roseap/en/sustainable-development-goals.html#:~:text=Target%208.7%20%2D%20Take%20immediate%20and%20labour%20in%20all%20its%20forms>.

9 UNOHCHR, “Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime, adopted and opened for signature, ratification and accession by United Nations General Assembly Resolution 55/2,” United Nations, 15 November 2022.

6 Coverage of Modern Slavery and Human Trafficking in National Risk Assessments within Sub-Saharan Africa



the Convention but there has been no ratification, acceptance, approval, or accession).<sup>10</sup>

According to the *2018 Global Slavery Index*,<sup>11</sup> modern slavery is considered to be a “hidden everyday problem” and the International Labour Organization (ILO) refers to it as “the very antithesis of social justice and sustainable development.”<sup>12</sup> The 2021 Global Estimates, published by the ILO, Walk Free, and the International Organization for Migration (IOM),<sup>13</sup> indicates that 49.6 million people are in situations of HT/MS on a daily basis. Forced labour accounts for 27.6 million, with women and girls making up 11.8 million (3.3 million of this total are children and forced marriages account for 22 million). This translates to one in every 150 people across the world being subject to HT/MS. The figures reported point to an increase of 9.3 million globally in the number of persons under HT/MS since the last global estimates in 2016.<sup>14</sup> The Global Organized Crime Index 2021, published by the Global Initiative Against Transnational Crime, flagged HT/MS as “the most pervasive of criminal markets” and pointed out human trafficking to be an almost ubiquitous market to varying degrees across jurisdictions. The report went on to highlight that: “[T]he human trafficking market has been fuelled by mass displacement, often overlapping with human smuggling, and caused by, among other factors, conflict, desperate socioeconomic conditions and — not least of all — crime...”<sup>15</sup>

In Africa, the United Nations Office of Drugs and Crime (UNODC), in reporting on the smuggling of migrants, estimates that “two of the principal smuggling routes -

leading from East, North and West Africa to Europe and from South America to North America - generate about \$6.75 billion a year for criminals, and at times, those smuggled end up being victims of human trafficking.”<sup>16</sup> The amounts generated by HT/MS could be even higher if one were to consider the reported \$88 billion in illicit capital flows from the African continent.<sup>17</sup> According to figures reported in the Global Estimates,<sup>18</sup> around 7 million people live in conditions of HT/MS in Africa – 3.8 million in conditions of forced labour and 3.2 million in forced marriages. Almost three people per thousand are reported to be living in HT/MS on the continent.<sup>19</sup> However, the number of Africans trafficked to different regions across the world is much higher. The UNODC reports that “[t]rafficking flows out of sub-Saharan Africa have a global dimension, with victims detected in Western and Southern Europe, in North Africa and in the Middle East. Victims from sub-Saharan countries are also detected in North America and East Asia.”<sup>20</sup>

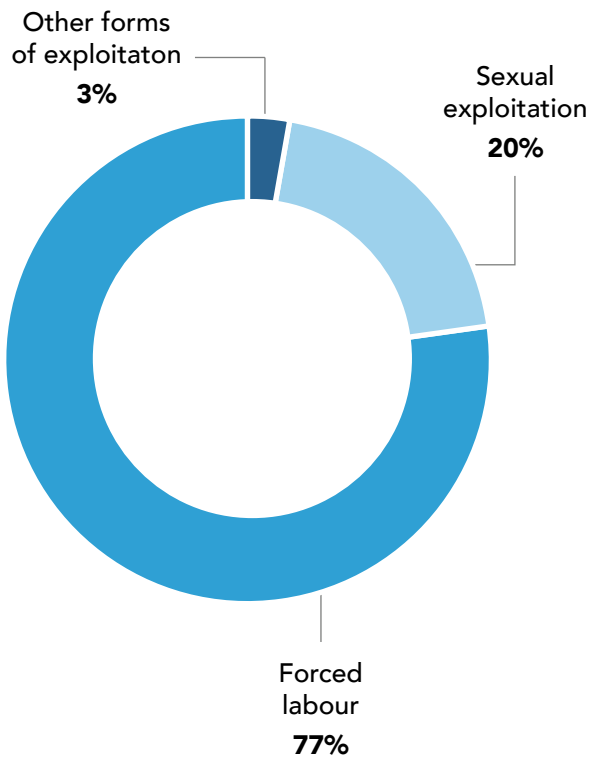
Although the HT/MS prevalence rates in Africa have decreased in the Global Estimates, there is still a relatively high prevalence of HT/MS from Africa to other parts of the world due to persistent poverty and conflict. Unemployment, corruption, globalization of the economy, ease of travel within the continent, the demand for cheap labour in developed countries, and cultural or religious norms are also contributing factors.<sup>21</sup> According to the Royal United Services Institute (RUSI), the emergence of “[t]he on-going conflicts in the Middle East and West Africa combined with the emergence of

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- 10 UNOHCHR, “Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime, adopted and opened for signature, ratification and accession by United Nations General Assembly Resolution 55/2,” United Nations, 15 November 2022.
  - 11 Walk Free Foundation, *The Global Slavery Index 2018* (Netherlands: Mindereroo Foundation, 2018).
  - 12 International Labour Organisation, Walk Free and International Organization for Migration, *Global Estimates of Modern Slavery, Forced Labor, and Forced Marriages* (Geneva: ILO Publications, 2022).
  - 13 International Labour Organisation, Walk Free and International Organization for Migration, *Global Estimates of Modern Slavery, Forced Labor, and Forced Marriages* (Geneva: ILO Publications, 2022), p. 2.
  - 14 International Labour Organisation, Walk Free and International Organization for Migration, *Global Estimates of Modern Slavery, Forced Labor, and Forced Marriages* (Geneva: ILO Publications, 2022), p. 21.
  - 15 Global Initiative Against Transnational Organized Crime, *Global Organized Crime Index 2021* (Geneva: GI-TOC Publications, 2021).
  - 16 UNODC, “Smuggling of migrants – The harsh search for a better life,” *Factsheet* (Vienna: UNODC, n.d.). Available at: [https://www.unodc.org/documents/toc/factsheets/TOC12\\_fs\\_migrantsmuggling\\_EN\\_HIRES.pdf](https://www.unodc.org/documents/toc/factsheets/TOC12_fs_migrantsmuggling_EN_HIRES.pdf).
  - 17 UNODC, “UNODC Counters Illicit Financial Flows in Africa,” UNODC, 4 November 2020, <https://www.unodc.org/unodc/frontpage/2020/November/unodc-counters-illicit-financial-flows-in-africa.html>.
  - 18 International Labour Organisation, Walk Free and International Organization for Migration, *Global Estimates of Modern Slavery, Forced Labor, and Forced Marriages* (Geneva: ILO, 2022), p. 3.
  - 19 International Labour Organization, Walk Free and International Organization for Migration, *Global Estimates of Modern Slavery, Forced Labor, and Forced Marriages* (Geneva: ILO, 2022), p. 3.
  - 20 UNODC, *Global Report on Trafficking in Persons* (New York: United Nations, 2022), p. 165.
  - 21 Joy Ngozi Ezeilo, “Trafficking in human beings in the African context,” *Routledge Handbook on Human Trafficking* ed(s). Ryszard Piotrowicz, Conny Rijken, and Baerbel Uhl (London: Routledge, 2017).

failed states and porous borders create ideal conditions for people smugglers and traffickers.”<sup>22</sup> The UN Global Trafficking Report, in assessing the origin of transregional trafficking flows, highlighted that victims from East Asia and Sub-Saharan Africa were detected in a large number of countries in almost every region of the world.<sup>23</sup> Children account for the majority of victims detected, especially in West Africa, whilst Southern African and East African

countries tend to detect more adults than children. The majority of detected victims in Sub-Saharan Africa are trafficked for the purpose of forced labour.<sup>24</sup> Among the other forms of exploitation, countries in this region also reported trafficking for forced criminal activity, forced marriages, and mixed forms of exploitation. Yet countries in Sub-Saharan Africa still record a limited number of convictions.<sup>25</sup>

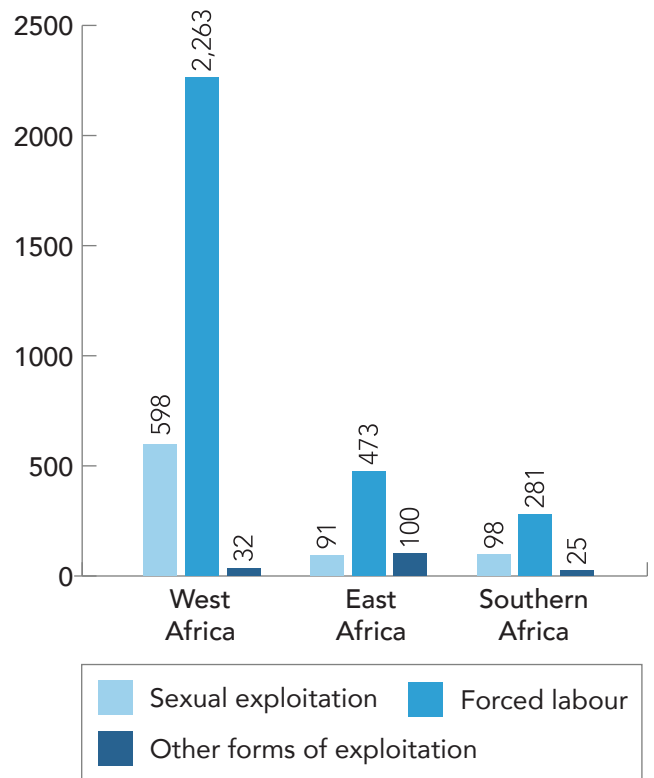
Figure 1: Share of detected victims of trafficking in Sub-Saharan Africa,\* by forms of exploitation, 2018 (or most recent)



Source: UNODC elaboration of national data.

\*Based on data on forms of exploitation for 4,835 victims detected in 22 countries in Sub-Saharan Africa.

Figure 2: Number of detected victims of trafficking in Sub-Saharan Africa,\* by forms of exploitation and subregion, 2018 (or most recent)



Source: UNODC elaboration of national data.

\*Based on data on forms of exploitation of detected victims in 10 countries in West Africa, 3 countries in East Africa and 7 countries in Southern Africa.

22 Centre for Financial Crime and Security Studies, “Illicit Flows and Migration: Profiting from Tragedy”, Royal United Services Institute (RUSI), 1 October 2015, <https://rusi.org/events/illicit-flows-and-migration-profiting-tragedy>.

23 UNODC, *Global Report on Trafficking in Persons* (New York: United Nations, 2020), p. 61.

24 UNODC, *Global Report on Trafficking in Persons* (New York: United Nations, 2020), p. 165.

25 UNODC, *Global Report on Trafficking in Persons* (New York: United Nations, 2020), p. 64.

It is therefore imperative to adopt a multipronged approach to effectively combat this crime. One of the most important steps is improved communication, collaboration, and coordination between Financial Intelligence Units (FIUs), law enforcement agencies, and the financial sector.<sup>26</sup> The FAST initiative's *Blueprint for Mobilizing Finance Against Slavery and Trafficking* points to collective action and the unparalleled influence of banks as financial intermediaries, investors, insurers, and financial partners. The Blueprint also calls on other financial sector actors to foster global business practices that help to end HT/MS.<sup>27</sup>

For organized crime groupings, HT/MS is a lucrative multibillion dollar trade and often these are crimes with financial motivation.<sup>28</sup> Therefore, a necessary step to disrupt the money flow arising from and related to HT/MS includes systematically tracing the flow of funds by launching financial investigations;<sup>29</sup> reporting suspicious activities and transactions; freezing, seizing, and confiscating assets; and securing criminal prosecutions to ensure justice and remedy for victims.<sup>30</sup> Indicators setting out what financial institutions must look out for can help identify the financial footprints of HT/MS and increase the likelihood of detection, generation of actionable intelligence insights, reporting, and legal action.<sup>31</sup>

HT/MS also present a third-party risk and liability for corporations due to the fact that they may be deeply embedded in the long, complex, and opaque supply chains of their clients. In such scenarios, victims may be trafficked into lawful sectors that are part of a population's ordinary consumption, such as food production, construction, and textile manufacturing. Traffickers involved in this form of exploitation may not necessarily work underground in illicit markets, but may instead be associated with officially registered companies or

operate in a broader informal economic system where working conditions resort to exploitative practices to increase profits.<sup>32</sup> Statista reported that 45 per cent of the population in Sub-Saharan Africa was unbanked,<sup>33</sup> and the lack of visibility of financial flows for this significant part of the overall population adds to the challenges in following the movement of money. Furthermore, the regularity of informal and cash-based economies, where cash transactions are the order of the day, make it more difficult to detect certain activities and keep track of cash flows. A report by the Inter-Governmental Action Group against Money Laundering in West Africa (GIABA), *The Economy of Illicit Trade in West Africa*,<sup>34</sup> points out that while informal money transfer solutions like *hawala* have proven to be effective low-cost money remittance solutions for migrants and communities, they may also easily be used to transfer illicit funds related to criminal activity, including HT/MS.<sup>35</sup>

In order to assist countries and financial institutions to better understand the nature of money laundering risks and typologies associated with HT/MS, and to inform their response strategies and resource prioritization, NRAs can serve as a critical tool.

## Objective and Scope

The proper identification, assessment, and understanding of HT/MS risk is the first foundational step towards an effective strategy and risk-based approach to combat HT/MS. As a baseline exercise, it is necessary to understand the process followed in Sub-Saharan African countries to identify, assess, and understand these risks in NRAs. This includes identifying typologies and examples of HT/MS in NRAs.

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26 Tom Keating and Anne-Marie Barry, "Disrupting Human Trafficking: The Role of Financial Institutions" *RUSI Whitehall Report 1-17* (London: Royal United Services Institute for Defence and Security Studies, 2017).

27 The Liechtenstein Initiative for a Financial Sector Commission on Modern Slavery and Human Trafficking, *A Blueprint for Mobilizing Finance Against Slavery and Trafficking: Final Report of the Liechtenstein Initiative's Financial Sector Commission on Modern Slavery and Human Trafficking* (New York: FAST Initiative, 2019), p. 2.

28 UNODC, "Human trafficking: organized crime and the multibillion dollar sale of people," UNODC, 19 July 2012, <https://www.unodc.org/unodc/en/frontpage/2012/July/human-trafficking-organized-crime-and-the-multibillion-dollar-sale-of-people.html>.

29 Organisation for Security and Co-operation in Europe (OSCE), "Follow the money: How financial investigations aid in the fight against human trafficking," OSCE, 3 March 2020, <https://www.osce.org/magazine/447688>.

30 UNODC, "Smuggling of migrants – The harsh search for a better life," Factsheet (Vienna: UNODC, n.d.). Available at: [https://www.unodc.org/documents/toc/factsheets/TOC12\\_fs\\_migrantsmuggling\\_EN\\_HIRES.pdf](https://www.unodc.org/documents/toc/factsheets/TOC12_fs_migrantsmuggling_EN_HIRES.pdf).

31 OSCE, *Following the Money: A Compendium of Resources and Step-by-Step Guide to Financial Investigations Related to Trafficking in Human Beings* (Vienna: OSCE, 2019).

32 UNODC, *Global Report on Trafficking in Persons* (New York: United Nations, 2020), p. 95.

33 Statista, *Distribution of unbanked population from 2011 to 2021, by Region* (New York: Statista Research Department, 2022).

34 Inter-Governmental Action Group against Money Laundering in West Africa (GIABA), *Illicit Financial Flows: The economy of illicit trade in West Africa* (Paris: OECD, 2018).

35 Inter-Governmental Action Group against Money Laundering in West Africa (GIABA), *Illicit Financial Flows: The economy of illicit trade in West Africa* (Paris: OECD, 2018), p. 40.

Therefore, the scope of the research is to conduct an analysis of NRAs from countries in Sub-Saharan Africa and provide a report that explains how these NRAs

analyse HT/MS risks. In determining which countries to focus on, reliance was placed on the World Bank's list of Sub-Saharan countries (see map below).<sup>36</sup>



36 "FOCUS: Sub-Saharan Africa", The World Bank Group, last accessed on 10 February 2023, <https://openknowledge.worldbank.org/pages/focus-sub-saharan-africa>

## Research Method and Report Limitations

In order to address the scope of the report and the research questions it poses, a desktop review and analysis of publicly available information on HT/MS within Sub-Saharan Africa was conducted. The published data sources across Sub-Saharan Africa (set out below) were reviewed to determine if NRAs were conducted and/or published and how they analyse HT/MS risks, particularly with regards to money laundering-related risks.

In addressing the scope, a pragmatic approach was adopted. In circumstances where it was confirmed through secondary sources that an NRA was in place, but was not publicly available or dated, the provisions in Mutual Evaluation Reports – published by the Financial Action Task Force (FATF), Eastern and Southern Africa Anti-Money Laundering Group (ESAAMLG), the Inter-Governmental Action Group Against Money Laundering in Western Africa (GIABA) and Groupe d'Action contre le blanchiment d'Argent en Afrique Centrale (GABAC) – were taken as acceptable evidence of the existence of an NRA and the relevant provisions, as were FIU Annual Reports. Similarly, published draft NRAs were considered for purposes of this review exercise, as acceptable evidence of the existence of an NRA. Where data was not readily available through a FIU website, or the sites of FATF or regional bodies, other secondary data sources were considered, which included information published by the Egmont Group, the United Nations, the World Bank, the *Global Slavery Index* and *2022 Trafficking in Persons Report*, and data published in *Financial Crime News*.

The data collection process was aimed at addressing the following:

- Determining which countries fall within the ambit of Sub-Saharan Africa for purposes of the research.
  - Assessing availability of an NRA per country and determining the year it was concluded.
  - Determining whether HT/MS risk was assessed or evaluated in the NRA.
  - Establishing whether the NRA provides detailed statistics of HT/MS incidents or prevalence.
  - Determining if any case studies, typologies, or examples are included in the NRA demonstrating money laundering related to HT/MS.
  - Categorizing the data reviewed based on the nature and depth of information included in the NRA.
- Considering other contextual information to assist with a clearer understanding of the HT/MS risk profile of each country.

As part of the process of collecting and reviewing relevant data, the key word search functionality was used for the following terms:

National Risk Assessment, NRA, human trafficking, trafficking, modern slavery, slavery, trading in persons, trafficking in persons, human smuggling, sexual exploitation, forced labour, forced labor, begging, forced marriage, baby selling, removal of organs, forced organ harvesting, organ trafficking, human exploitation.

French and Portuguese websites and documentation were translated accordingly into English using Google Translate. Information captured was organized thematically to allow for comparison of responses and approaches between countries and to identify similarities, differences, limitations, and best practices in Sub-Saharan Africa. The analysis informed the observations and recommendations made.

This report is subject to the following limitations which may influence the validity of the findings:

- Information which formed the basis of the analysis was sourced from publicly available information that was readily accessible as of 14 October 2022. A diligent web-based search was conducted to establish the existence of completed and draft NRAs and to assess the provisions relating to HT/MS (as applicable). Subsequent NRA amendments, revisions, and publications could have an impact on the report's findings.
- NRAs and related documentation were not read in full but thorough analyses were conducted through the application of key word searches in line with the methodology. Therefore, there is the risk of involuntary and inadvertent omission of NRA mentions, although due diligence was applied in key word searches.
- There were instances where actual NRAs were not available publicly but were referenced in other published documentation such as presentations, mutual evaluation reports, annual reports, FIU websites, or other reports by regional bodies such as ESAAMLG, GIABA or GABAC. In such instances, it could not be conclusively determined what additional HT/MS information is contained in NRA documents.
- The categorization of 'No HT/MS Mention,' 'HT/MS Mention at a cursory level,' and 'HT/MS Mention

in Detail' was only applied to countries that had publicly available and accessible information on NRAs. Countries without such readily accessible information were not included in this part of the analysis.

- The NRAs reviewed were completed and published between 2013 and 2022. Over this period, the HT/MS landscape and understanding of related risks has changed. Therefore, there may be potential gaps in the nature and type of information captured in earlier NRAs relative to those concluded after 2018.
- Most NRAs did not provide comprehensive statistics of HT/MS as a predicate offence or money laundering related to HT/MS. Furthermore, there

are significant disparities across countries in the reporting of statistics and at times inconsistent data is reported. Data is also captured in different formats and for different time periods, which presented a challenge to conduct an in-depth comparative data analysis.

- The current study does not comprehensively address the financial inclusion of vulnerable persons or groups in NRAs and is limited to the terms of the study's scope. It is recommended that a more in-depth review be undertaken to understand the overall approach to financial inclusion and vulnerable customers in NRAs within sub-Saharan Africa and how this can be leveraged to address the financial inclusion of HT/MS victims and survivors.

# National Risk Assessment Data Analysis

## Status of NRAs across Sub-Saharan Africa

The first part of the research study considered which Sub-Saharan African countries have conducted NRAs.

### Findings:

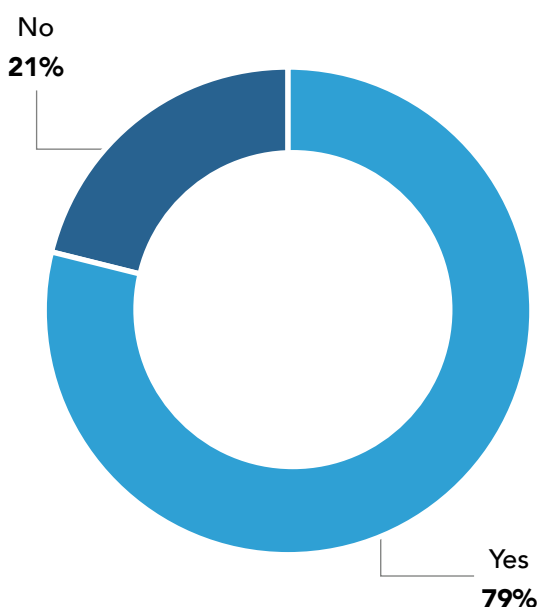
- It is noteworthy that 79 per cent of countries within Sub-Saharan Africa – 38 out of 48 countries – have conducted NRAs, although the nature, depth, and periods of the assessments vary (see Figure 3 below).
- Actual NRA reports were available for 19 countries. In instances where the actual NRA report was not publicly available, its existence was validated by secondary sources such as Mutual Evaluation Reports, FIU Annual Reports, World Bank or IMF reports, or media reports. Published draft NRAs were also taken into consideration. For instance, in the case of Sierra Leone, its 2018–2020 NRA only referred to the enactment of laws against human trafficking. However, a revised draft NRA has been published, as of 29 July 2022, which confirms that the country’s FIU has been conducting workshops on the draft NRA.

- Of the 38 NRAs that are in place, as of the date of this report, 82 per cent (31) were completed, adopted, or published during or after 2018.
- Based on publicly available information, several countries used the World Bank National Risk Assessment Tool. These countries include Angola, Ethiopia, Guinea-Bissau, Madagascar, Mozambique, Namibia, Niger, United Republic of Tanzania, Togo, Uganda, Benin, Botswana, and Eswatini.

### Countries that fall within the 79 per cent that have either completed, published, or have draft NRAs are the following:

Angola (2022)	Malawi (2018)
Benin (2018)	Mali (2018)
Botswana (2017)	Mauritania (2020)
Burkina Faso (2018)	Mauritius (2019)
Cabo Verde (2019)	Mozambique (2022)
Cameroon (2021)	Namibia (2021)
Comoros (2019)	Niger (2018)
Democratic Republic of the Congo (DRC) (2013)	Nigeria (2016)
Republic of Congo (2021)	Rwanda (2018)
Côte d’Ivoire (2019)	Senegal (2017)
Eswatini (2018)	Seychelles (2017)
Ethiopia (2016)	Sierra Leone (2022)
Gambia (2020)	Somalia (2022)
Ghana (2018)	South Africa (2019)
Guinea-Bissau (2020)	United Republic of Tanzania (2022)
Kenya (2021)	Togo (2019)
Lesotho (2018)	Uganda (2017)
Liberia (2019)	Zambia (2018)
Madagascar (2019)	Zimbabwe (2019)

Figure 3: Prevalence of National Risk Assessments in Sub-Saharan Africa



There was no demonstrable information found in the public domain to evidence the existence of NRAs for 10 countries – representing 21 per cent of the base. These include the following:

Burundi	Gabon
Central African Republic	Guinea
Chad	Sao Tome and Principe
Equatorial Guinea	South Sudan
Eritrea	Sudan

- Although Chad and Gabon do not have publicly available and verifiable NRAs, their Mutual Evaluation Reports referred to HT/MS risk without providing more detailed insights. For instance, the Chad Mutual Evaluation Report mentioned that “no estimate is available regarding the income generated from human trafficking. However, the mission learned that the amounts claimed by smugglers in Anjouan could be as much as €600 per migrant. Thus, annual proceeds from human trafficking would amount to millions of euros.”

- A media article on 29 November 2020 reported that Sudan launched a workshop to assess its ML/TF risk. Similarly, the 2019 GIABA Annual Report stated that Sao Tome and Principe was planning to commence the NRA process in 2020. In both instances, no further information was found to confirm that the process was completed. On the other hand, Equatorial Guinea reported that action and plans are underway to conduct an NRA.

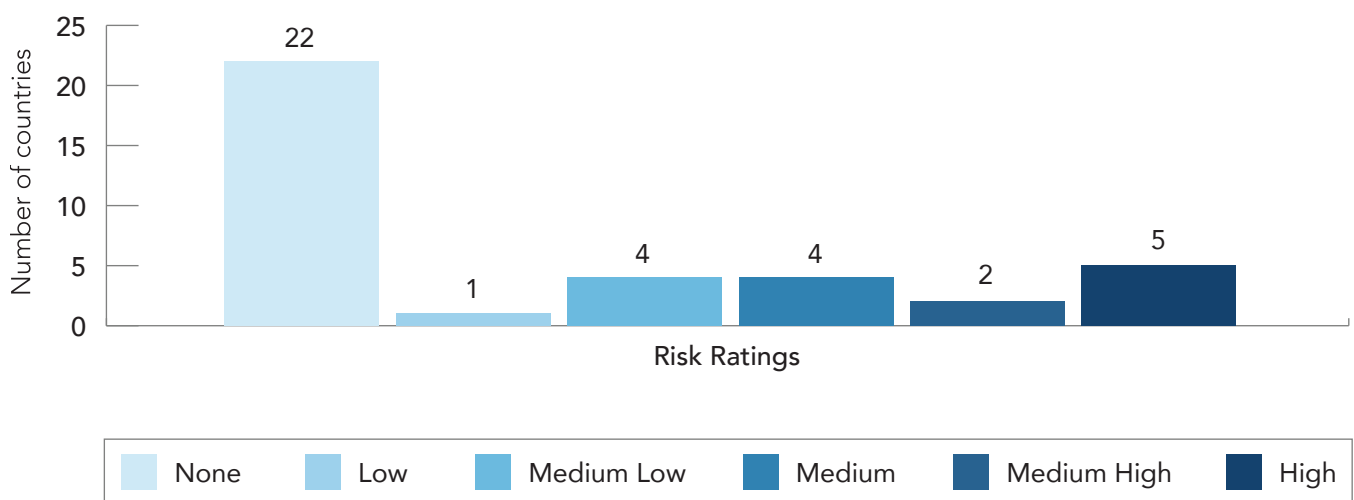
## HT/MS Risk Assessment and Evaluation

The data collected for the 38 Sub-Saharan African countries with NRAs or draft NRAs was analysed to understand if the HT/MS risk was assessed, and if so, whether it was considered high, medium, or low. Within this context, risk is considered to arise from an actual or perceived threat, vulnerability, and consequence.<sup>37</sup>

### Findings:

- Six categories for risk level were identified. See Figure 4 below.

Figure 4: HT/MS Risk Assessment Review



<sup>37</sup> Financial Action Task Force, *FATF Guidance National Money Laundering and Terrorist Financing Risk Assessment* (Paris: FATF, 2013), p. 7.



Twenty-two countries – approximately 58 per cent – of the 38 Sub-Saharan countries with NRAs or draft NRAs reviewed had no risk rating for HT/MS risks. The following countries fall within that category:

Angola	Guinea-Bissau
Botswana	Lesotho
Burkina Faso	Madagascar
Cabo Verde	Rwanda
Cameroon	Senegal
Comoros	Seychelles
DRC	United Republic of Tanzania
Republic of Congo	Togo
Côte d'Ivoire	Zambia
ESwatini	Zimbabwe
Ethiopia	Mauritania

- The failure to assess the level of HT/MS risk may be because the countries are not aware of the extent of the problem, lack the capacity to respond appropriately, or consider other crimes such as corruption and drug trafficking to be more relevant.
- Sixteen countries were risk rated.
- Benin, Liberia, Mali, Niger,<sup>38</sup> and Somalia are the five countries that considered HT/MS a high risk and they account for 13 per cent of the base.
- In the case of Benin, the resultant high risk rating was informed by the fact that its NRA identified human trafficking as one of the “criminal activities that are major illicit proceeds generating activities.”<sup>39</sup> According to the NRA, human trafficking and related crimes came second in prevalence and was one of the highest money laundering threats.<sup>40</sup> The NRA highlighted that the rampancy of informal economic activities and the permeable nature of its borders are vulnerabilities that are exploited by criminals and their associates to carry out a number of criminal activities identified in the NRA report. These activities include trafficking in human beings and human organs, amongst others. The report recognizes that “Benin’s status as a transit point for regional and international maritime and land trade exposes it to various forms of criminal activity. In Benin, the NRA report is used as one of the sources of understanding the country’s ML/TF risks.”<sup>41</sup>
- Liberia’s NRA rated its money laundering risk from human trafficking as high<sup>42</sup> and states that human trafficking is one of the most rampant crimes and high predicate offences in terms of prevalence.
- The NRA for Niger pointed to the immense and highly porous borders which make Niger fertile for trafficking (including trafficking in persons). The security situation in Libya since 2011 has exacerbated the issue. Exploitation by criminal and terrorist groups is also cited as a contributing factor. Therefore, human trafficking was identified as one of the high risks of money laundering and terror financing offences in the country.

38 Inter-Governmental Action Group Against Money Laundering (GIABA), *Anti-money laundering and counter-terrorist financing measures – Republic of Niger, Second Round Mutual Evaluation Report* (Dakar: GIABA, 2021). In paragraph 219 and 519 it is mentioned that according to the NRA, human trafficking is one of the “high risk [areas] of ML/TF offences” in Niger. However, the google translation of the actual NRA from French to English at page 16 says the ML/FT threat linked to migrant smuggling and human trafficking is low. Based on the context and the NRA information validated through the Mutual Evaluation Report, the current report has adopted the risk rating as quoted from the Mutual Evaluation Report.

39 National Technical Committee Against Money Laundering and Terrorism Financing (CTN-LBC/FT), *Benin Report on National Risk Assessment Money Laundering and Terrorism Financing* (Cotonou: Republic of Benin Ministry of Economy and Finance National Treatment Cell Financial Information, 2018).

40 National Technical Committee Against Money Laundering and Terrorism Financing (CTN-LBC/FT), *Benin Report on National Risk Assessment Money Laundering and Terrorism Financing* (Cotonou: Republic of Benin Ministry of Economy and Finance National Treatment Cell Financial Information, 2018), p. 27.

41 National Technical Committee Against Money Laundering and Terrorism Financing (CTN-LBC/FT), *Benin Report on National Risk Assessment Money Laundering and Terrorism Financing* (Cotonou: Republic of Benin Ministry of Economy and Finance National Treatment Cell Financial Information, 2018).

42 Republic of Liberia Financial Intelligence Agency, *National Risk Assessment on Money Laundering & Terrorist Financing* (Monrovia: Financial Intelligence Agency Liberia, 2019), p. 11.

- According to the Mali Mutual Evaluation Report, the draft version of Mali's NRA speaks to human trafficking as a prevalent offence constituting a key money laundering threat in the country. Human trafficking is also listed as one of the high-risk ML/TF offenses in Mali. Regarding criminal sources of financing, the report pointed to the correlation between terrorist financing and human trafficking-related money laundering and predicate offences.<sup>43</sup> The NRA also acknowledges an issue with trafficking of migrants and the lack of effective control mechanisms for controlling cross-border physical cash flow, which further increases money laundering risk. Therefore, the human trafficking and money laundering risk was considered high.<sup>44</sup>
- The NRA for Somalia made reference to findings from a rapid assessment which indicated that human trafficking was widespread, although the full scale was difficult to determine. Displacement due to war and immigration were cited as contributing factors. Although the NRA noted the economic motive driving human trafficking, there were no records of proceeds identified or confiscated. The NRA mentioned that victims were trafficked to Yemen and beyond, and Ethiopia and the United Republic of Tanzania for sexual exploitation and domestic servitude. Children were also prone to various forms of exploitation, including organ removal. North African traffickers known as *Magafe* enticed young boys and girls to go to Europe via Libya. The NRA confirmed there is a lack of capacity to enforce measures to address MS/HT, coupled with inadequate legislative frameworks.
- In contrast, Namibia is the only country in the region where HT/MS risk was rated low in the country's NRA. Namibia acknowledged that although HT/MS is highlighted as a growing concern globally, the country's Tier 1 rating,<sup>45</sup> in conjunction with a relatively low number of cases, resulted in a low-risk rating. The NRA noted that "there has not been significant indications that may suggest notable trends of illicit financial flows related to trafficking in persons."
- The Gambia, Nigeria, Sierra Leone, and Uganda assessed HT/MS risk as medium, accounting for 11 per cent of the base. For instance, The Gambia provided the rationale in support of its risk assessment and pointed to the potential money laundering activities from predicate offences such as drug trafficking and human trafficking, which are exacerbated by porous borders and the free movement of people within the West African sub-region. The draft NRA in Sierra Leone flagged the prevalence of the trafficking of children, but its magnitude could not be determined owing to a lack of comprehensive statistics. Traditional beliefs/practices and poverty featured as the main reasons for the continued occurrence of domestic trafficking. Sierra Leone was noted as a source, transit, and destination country for children and women subjected to trafficking in persons, specifically forced labour and commercial sexual exploitation. Victims come largely from rural provinces and refugee communities within the country and are recruited to urban and mining centres for the purposes of commercial sexual exploitation, forced domestic work, and forced service or labour in petty trading, street crime, and begging. Victims may also be found in the fishing and agricultural sectors or are subjected to forced prostitution or forced labour through customary practices such as forced and arranged marriages. The incidence of transnational trafficking is relatively small, but Sierra Leone is likely still a source and destination country for the movement of persons to destinations in West Africa, the Middle East, and Europe. Sierra Leone might also be a destination country for children trafficked from Nigeria.<sup>46</sup>
- South Africa and Mozambique (5 per cent) are the only two countries that assessed their HT/MS risk as medium high. Ghana, Kenya, Malawi, and Mauritius considered their HT/MS risk as medium low, also accounting for 11 per cent of the base.

43 Inter-Governmental Action Group Against Money Laundering (GIABA), *Anti-money laundering and counter-terrorist financing measures – Mali Mutual Evaluation Report* (Dakar: GIABA, 2019), pp. iv and 27.

44 Inter-Governmental Action Group against Money Laundering (GIABA), *Anti-money laundering and counter-terrorist financing measures – Mali Mutual Evaluation Report* (Dakar: GIABA, 2019), pp. iv, 27, and 49.

45 US Department of State Office to Monitor and Combat Trafficking in Persons, *Trafficking in Persons Report Namibia* (Washington DC: US Department of State, 2022).

46 Financial Intelligence Unit Sierra Leone, *The National Money Laundering and Terrorist Financing Risk Assessment* (Freetown: Republic of Sierra Leone, 2017), p. 11.

## Categorization Based on Description of HT/MS

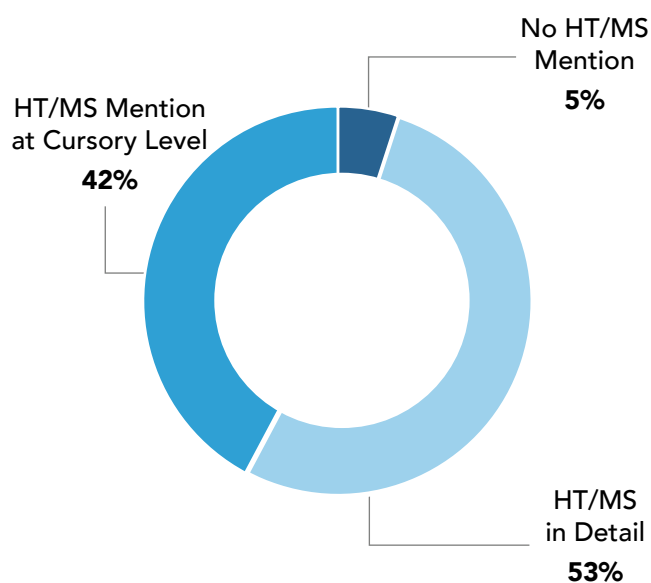
Data was analyzed to establish the extent to which NRAs mention HT/MS. The 38 Sub-Saharan Africa countries with completed or draft NRAs were categorised as follows:

- No HT/ MS mention
- HT/MS mentioned at cursory level
- HT/MS mentioned in detail.

Countries were classified as mentioning HT/MS in detail if the NRA provided more context around the nature of HT/MS in their jurisdiction. Countries assigned to this category provided insight around a number of features including but not limited to the profile of traffickers and victims; factors contributing to vulnerability or prevalence of HT/MS; the source, movement, and destination of victims; the industries impacted by HT/MS; processes, schemes, or modus operandi used to traffic persons; and risk rating, statistics, and case studies.

Countries were categorized as dealing with HT/MS at a cursory level if they referred to the existence of HT/MS without providing deeper insights around the source, nature, and extent of the risk.

Figure 5: Percentage of Countries Where HT/MS is Mentioned in Reviewed Documentation



### Findings:

- Whilst NRAs are in place in 38 jurisdictions in Sub-Saharan Africa, HT/MS was mentioned in the NRAs, Mutual Evaluation Reports or FIU websites of 36 countries, which accounts for 95 per cent of this base (See Figure 5 below).
- Madagascar and Seychelles, representing 5 per cent of this base, were classified as 'No HT/MS mentions' and did not assess or evaluate the risk either. For instance, the Seychelles specifically stated that HT/MS is excluded from the NRA process due to a lack of statistical records and systematic data collection.

**The 16 countries that discussed HT/MS at a cursory level in their NRAs, Mutual Evaluation Reports or the website of their Financial Intelligence Centres accounted for 42 per cent of the base of countries with completed or draft NRAs. The countries either mention HT/MS in the form of text, legislation, or in a table without providing in-depth detail. Countries falling into this category include the following:**

Angola	Guinea-Bissau
Botswana	Lesotho
Burkina Faso	Mauritania
Republic of Congo	Rwanda
Cabo Verde	Senegal
Comoros	Togo
DRC	Zambia
Ethiopia	Zimbabwe

- The Rwanda NRA referred to enactment of Law N° 51/2018 relating to the prevention, suppression, and punishment of trafficking in persons and exploitation of others. Besides that, there is no further reference made to HT/MS risks. However, according to the *2018 Global Slavery Index*, Rwanda ranks 10<sup>th</sup> out of 51 African countries and 16<sup>th</sup> out of 167 countries globally in terms of HT/MS prevalence, with an estimated absolute number of victims placed at 134,000.

HT/MS was mentioned in detail in 53 per cent of the reviewed base. The countries falling within this category did not only make factual assertions but provided context around the nature and extent of HT/MS risk, the profile of the perpetrators and victims, as well as some statistical data. The countries that made mention of HT/MS in detail are the following:

Benin (H)	Mauritius (ML)
Cameroon (None)	Mozambique (MH)
Côte d'Ivoire (None)	Namibia (L)
Eswatini (None)	Niger (H)
Gambia (M)	Nigeria (M)
Ghana (ML)	Sierra Leone (M)
Kenya (ML)	Somalia (H)
Liberia (H)	South Africa (MH)
Malawi (ML)	United Republic of Tanzania (None)
Mali (H)	Uganda (M)

High (H); Medium High (MH); Medium (M); Medium Low (ML); Low (L)

- For instance, Ghana provided more details around HT/MS and money laundering-related risk. The NRA defines what HT/MS is and provides examples of transnational cases which consisted of the outward and inward flow of victims. It is reported in the NRA that “the outward cases were mostly the procurement of victims from Ghana to Turkey, Saudi Arabia, United Arab Emirates, and other Arabian countries as domestic helps, artisans for construction, and oil exploration activities.” In respect of inward flows, “nationals from foreign jurisdictions such as China, Bangladesh, Thailand, and the West African subregion, were procured into the country by human traffickers.” The NRA also flagged the prevalence of domestic cases of human trafficking with most of the victims being children recruited to work on farms and for fishing activities and illegal mining (*galamsey*) activities. The risk rating is set as medium low.<sup>47</sup>

- Kenya also provided insightful detail and identified human trafficking and smuggling as one of its money laundering threats, although predicate offense risk was deemed to be low. According to the NRA:

Human trafficking and smuggling of persons is rated as a medium-low risk. This is a result of Kenya’s geographical location as it is in a politically volatile region, where many economic immigrants and others fleeing political instability in their countries are seeking to resettle in Kenya. Consequently, there has been an increasing influx of illegal aliens and undocumented immigrants mainly from the United Republic of Tanzania, Ethiopia, Somalia, and South Sudan but also from other countries including Nigeria, Rwanda, Burundi, Republic of Congo, and China. From this analysis, the threat of ML [Money Laundering] relating to human trafficking and smuggling of persons was rated as medium-low, but the trend is likely to increase due to the use of North-Eastern countries by smugglers for transiting economic migrants mainly from Ethiopia and Somalia.

- Details on prosecutions were also provided. The NRA confirmed that there were 751 prosecutions and 342 convictions from 2016–2020 relating to human trafficking offences in Kenya.<sup>48</sup> Proceeds related to human trafficking are estimated to be KSh (Kenyan Shilling) 50 million with 100 per cent confiscation of the proceeds.
- In Malawi, the published NRA considers human trafficking to be one of the top five predicate offences generating illicit proceeds. Victims are trafficked from rural and urban areas, and the major destination is South Africa, with some people also being trafficked to the Middle East. The NRA noted that it is difficult to quantify human trafficking cases due to lack of awareness and poor record keeping. The NRA also acknowledged the threat posed by Malawi being a transit country for people trafficked from other African countries like Ethiopia and Somalia to South Africa. Although law enforcement agencies may find evidence of human trafficking, often they are not able to trace the proceeds of the crime because many perpetrators use cash to avoid detection.
- In the United Republic of Tanzania, the NRA explained that HT/MS has both a local (non-cross border) and

47 Republic of Ghana Financial Intelligence Centre, *National Anti-Money Laundering and Countering the Financing of Terrorism (AML/CFT) Risk Assessment of Ghana* (Accra: Financial Intelligence Agency Centre Ghana, 2018), p. 86.

48 Republic of Kenya Financial Reporting Centre, *The National Money Laundering and Terrorism Financing Risk Assessment Report 2021* (Nairobi: Financial Reporting Centre Kenya, 2021), p. 19.

international dimension, impacting citizens as well as legal and illegal foreign nationals. The conditions making the country vulnerable to human trafficking were outlined as “poverty, conflict, natural disaster, breakdowns in the rule of law, dislocation, disruption of social support systems, and other global crises that can intensify victims’ vulnerabilities to recruitment and exploitation.”

It was reported that over the past five years, human traffickers in the United Republic of Tanzania exploited domestic and foreign victims. Traffickers also exploited victims from Tanzania abroad. The identified modus operandi by traffickers included deceiving family members, friends, or intermediaries by fraudulently offering assistance with education, better living conditions, and employment in urban areas and abroad. The brokers sometimes infiltrated communities to recruit and transport victims into trafficking situations. Those at most risk to trafficking were vulnerable children from impoverished backgrounds, orphaned children from rural areas, children with disabilities, and Burundian and Congolese refugees and migrants. Women, children, internally displaced persons, and migrants were victims of forced labour and sexual exploitation. Girls were exploited by traffickers in situations of domestic servitude and sex trafficking, especially around tourist hubs along the border with Kenya. One NGO operating in the United Republic of Tanzania reported that traffickers targeted young girls from rural and impoverished villages and paid their parents to coerce the girls into sex trafficking. Children were also trafficked to provide forced labour on farms, in gold and gemstone mines and quarries, in the informal commercial sector, and on fishing vessels operating in Tanzanian and international waters. There were instances where some unscrupulous individuals exploited the traditional practice of child fostering – in which poor parents entrust their children into the care of wealthier relatives or respected community members – so that children often ended up in situations of forced labour as domestic workers. There were also reported cases of forced labour involving Cuban medical workers forced to work by the Cuban

Government, and Chinese nationals who may have been forced to work by the Chinese Government or their employers, including Chinese State-owned enterprises.<sup>49</sup>

- A common feature of countries that provided more details on HT/MS risks is that they all acknowledged the transnational nature of HT/MS, recognizing that it has both a local and international dimension. Secondly, all countries that provided more details realize that they are a source, transit, and/or destination for HT/MS.

## Reported Statistical Information on HT/MS

Most NRAs did not provide comprehensive statistics of human trafficking as a predicate offence or of money laundering relating to human trafficking. Furthermore, there are significant disparities across countries in the reporting of statistics and at times inconsistent data is reported. Data is also captured in different formats and for different time periods, which presents a challenge when conducting a qualified in-depth data comparison.

The information on investigations, prosecutions, convictions, confiscations, and the amounts of money involved was reviewed for the 16 countries that rated HT/MS risk.

### Findings:

- Fourteen of the 16 countries – 88 per cent – recorded the number of investigations related to HT/MS.
- Twelve of the 16 countries – 75 per cent – recorded the number of prosecutions related to HT/MS.
- Six of the 16 countries – 38 per cent – recorded the number of convictions related to HT/MS.
- One country – 6 per cent – recorded the number of confiscations related to HT/MS.
- Five of the 16 countries – 31 per cent – recorded the amounts involved.

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49 United Republic of Tanzania Ministry of Finance and Planning Financial Intelligence Unit, *The National Money Laundering, Terrorist Financing and Proliferation Financing Risk Assessment 2022/2023 Revised June 2023* (Dar es Salaam: United Republic of Tanzania Ministry of Finance and Planning Financial Intelligence Unit, 2022), p. 23.

There were a few good examples of countries that made use of statistical data:

- In The Gambia the statistics on HT/MS investigations and prosecutions were provided for the period 2017–2021, covering the number of cases reported, and the

number of suspects, investigations, prosecutions, and convictions (see table below).<sup>50</sup> However, there were no parallel financial investigations alongside HT/MS predicate offence investigations.

Table 1: Investigation and Prosecution of Trafficking in Persons, January 2017–August 2021

Year of Offense	2017	2018	2019	2020	2021	Total
Cases reported	4	5	12	12	48	81
Number of suspects	..	..	23	48	..	71
Investigations initiated	4	5	12	12	48	81
Investigations concluded	2	3	5	4	5	19
Prosecutions commenced	-	1	3	0	2	6
Prosecutions concluded	-	-	0	0	0	0
Number of convictions secured	-	-	0	0	2	2

Source: National Agency Against Trafficking in Persons (NAATIP).

- The Ghana NRA notes that the country does not have comprehensive statistics on its anti-trafficking law enforcement efforts. However, the NRA mentions that law enforcement agencies conducted 238 investigations in 2015, including labour and sex trafficking.<sup>51</sup> Three licensed recruitment agencies were investigated by the Ministry of Labour and Employment and two other cases were referred for further investigation by the Anti-Human Trafficking Unit. Twenty cross border trafficking cases were reported in 2016, compared to 10 cases reported in 2015. Eighteen suspected forced labour and three suspected sex trafficking cases were reported. Of the 217 cases investigated by the attorney general's office, only five were referred for prosecution.
- In Kenya, 134 cases related to HT/MS and smuggling of persons were investigated during the assessment period 2016–2020.<sup>52</sup> Although many cases were reported, there was a challenge in pursuing perpetrators. Instead, most cases appearing before courts were against the victims who were charged with being in the country illegally. According to reported data, there were 751 prosecutions relating to human trafficking offences and 342 convictions were reported. Proceeds relating to human trafficking were estimated to be KSh 50 million, with 100 per cent confiscation of the proceeds.
- In Malawi, between 2009 and June 2012, 340 HT/MS-related cases were investigated. Twenty five people

50 Inter-Governmental Action Group Against Money Laundering (GIABA), *Anti-money laundering and counter-terrorist financing measures – Gambia Mutual Evaluation Report* (Dakar: GIABA, 2022), p. 82.

51 Republic of Ghana Financial Intelligence Centre, *National Anti-Money Laundering and Countering the Financing of Terrorism (AML/CFT) Risk Assessment of Ghana* (Accra: Financial Intelligence Agency Centre Ghana, 2018), p. 6–7.

52 Republic of Kenya Financial Reporting Centre, *The National Money Laundering and Terrorism Financing Risk Assessment Report 2021* (Nairobi: Financial Reporting Centre Kenya, 2021), p. 19.

were convicted in 2014 whilst 58 were convicted in 2015. Between 2013 and 2016 the number of HT/MS cases investigated was 79. Of these, 63 were prosecuted, resulting in 54 convicted cases and 116 convicted persons. The published data seems to point to a downward trend in the occurrence of human trafficking cases. However, it is probable that some cases are undetected and unreported. The NRA notes

that there are no records captured on the proceeds of HT/MS identified and confiscated.<sup>53</sup>

- In Mali, it was reported that between 2015 and 2018, 102 cases were investigated or detected, and one conviction secured for money laundering related to human trafficking and similar practices. Below is a table setting out the status of convictions for predicate offences related to money laundering (2015–2018).

Table 2: Status of Convictions for Predicate Offences to ML (2015-2018)

	Predicate Office					
	Number of cases detected or investigated	Number of lawsuits filed	Number of convictions (cases)	Number of people sentenced	Amounts of assets seized or frozen (without charge for ML)	Amount of confiscated assets (without charge for ML)
Data limitations and other issues for each indicator (where applicable)	CFA					
Predicate offence (This list must be reviewed by assessors)						
Illicit trafficking of drugs, pharmaceuticals & cigarettes	869	539	369		1,194,468,545	
Tax fraud	1,596	1,596			251,818,782,444	251,818,782,444
Customs fraud	16,673				15,730,535,839	15,730,535,839
Human trafficking and similar practices	102	21	1	1	0	0
Abduction, kidnapping and hostage-taking	98					

53 Republic of Malawi Financial Intelligence Authority, *Money Laundering and Terrorist Financing National Risk Assessment Report 2018* (Lilongwe: Malawi Financial Intelligence Authority, 2018) p. 10.

Predicate Office						
	Number of cases detected or investigated	Number of lawsuits filed	Number of convictions (cases)	Number of people sentenced	Amounts of assets seized or frozen (without charge for ML)	Amount of confiscated assets (without charge for ML)
Offences against public assets	223	122	75		730,936,356	
Theft	13,849	4,961	4,961		113,929,263	
Breach of trust	5,298	1,963	1,963			
Scam	3,945	1,826	1,826			
Forgery and use of forgery	370					
Terrorism	248	248	29	80	0	0
Terrorist financing	3	3	0	0	23,665,250	0
Arms trafficking	9	0	0	0	0	0
Currency counterfeiting	35	0	0	0	0	0
Cyber crime	0	0	0	0	0	0
Illegal logging and environmental crime generating profits	15,119	1	1	1	130,609,030	130,609,030
<b>Total</b>	<b>58,446</b>	<b>11,280</b>	<b>9,225</b>	<b>82</b>	<b>2,69743E +11</b>	<b>2,69743E +11</b>

Source: GIABA Mali Mutual Evaluation Report 2019.

- In Mauritius, there were 10 cases of human trafficking reported between 2014 and 2017. Of these, four were under investigation, two were discontinued due to a lack of evidence, three were pending trial, and one conviction was secured for the commercial and sexual exploitation of a minor. While suspected links with human trafficking and organized crime have been identified in some cases, the estimated proceeds generated from the offences is insignificant.
- In Namibia, a total of 24 human trafficking related cases were reported for the period between 2015 and 2019, with an estimated value of N\$16,650.00 per predicate offence. Data provided in the NRA is provided in the tables below.



Table 3: Volume of Prevalence-based Outcomes of ML Threat Ratings per Predicate Offence

Predicate Offences	2015	2016	2017	2018	2019	Total No. of Cases	Threat Rating (Report Volumes)
Potential tax related offences: Cases investigated by Inland Revenue	3	12	3	4	3	25	Low
Potential tax related offences: FIC disseminations to Ministry of Finance	38	64	99	143	107	451	
Potential corruption related crimes (Anti-Corruption Commission Annual Reports)	427	401	345	325	313	1,811	Medium
Fraud: Prevention of Counterfeiting of Currency Act	46	36	68	49	100	299	High
Fraud: Forgery and uttering	308	276	317	295	300	1,496	
Fraud: All other types	2,177	2,118	2,049	2,149	2,487	10,980	
Trafficking in persons	-	-	5	15	4	24	Low
Environmental crime: Illegal wildlife trade	364	498	383	654	587	2,486	Medium
Environmental crime: Diamond trafficking	1	-	1	-	-	2	Low
Environmental crime: Illegal possession of diamonds	4	1	9	35	9	58	Low
Environmental crime: Gold trafficking	-	1	-	-	1	2	Low
Environmental crime: Illegal possession of gold	1	1	-	-	1	3	Low
Environmental crime: Illicit fishing	8	10	8	2	2	30	Low
Environmental crime: Forestry crimes	4	6	12	8	5	35	Low
Environmental crime: Hazardous waste dumping and trafficking	-	-	-	-	-	-	Undetermined
Stock theft	2,446	2,578	2,705	2,791	2,642	13,162	High
Motor vehicle theft	392	440	383	367	385	1,967	Medium
Drugs (includes dealing and possession)	1,677	1,830	1,807	2,354	2,288	9,956	High
<b>Total volume of cases</b>	<b>7,896</b>	<b>8,272</b>	<b>8,194</b>	<b>9,191</b>	<b>9,234</b>	<b>42,787</b>	
<b>Overall threat rating (report volumes)</b>							<b>Medium High</b>

Source: Namibia National Risk Assessment.

Table 4: ML Financial Values Observed from STRs Analyses and Disseminated

Predicate Offences	2015	2016	2017	2018	2019	Est. financial value per predicate offence
	Amount (NAD)	Amount (NAD)	Amount (NAD)	Amount (NAD)	Amount (NAD)	
Potential tax related offences: Cases disseminated to Ministry of Finance	739,053,722.35	1,861,033,093.56	5,918,558,417.49	7,329,882,626.48	17,832,857,916.36	33,681,385,826.24
Potential corruption: Cases disseminated to Anti-Corruption Commission	18,603,156.40	1,171,836.14	50,553,214.00	30,344,749.00	145,921,326.00	246,594,281.54
All types of fraud cases	278,291,911.04	120,645,916.45	5,010,491,139.43	1,876,973,702.65	1,584,136,465.47	8,870,539,135.04
Environmental crimes except diamond & gold dealings	1,151,419.68	136,960.00	774,556,328.83	177,379,871.40	5,256,874.23	958,481,454.14
Environmental crime: Diamond trafficking	-	-	-	-	138,576.56	138,576.56
Environmental crime: Gold trafficking	-	-	-	-	-	-
Trafficking in persons	-	-	-	-	16,650.00	16,650.00
Stock theft	1,151,419.68	-	2,789,000.00	4,500.00	-	3,944,919.68
Motor vehicle theft	-	-	-	-	-	-
Drugs (includes dealing and possession)	395,500.20	454,828.00	146,599.36	1,862,206.00	-	2,861,133.56
Pyramid schemes	-	-	-	-	67,039,858.04	67,039,858.04
Virtual currencies	-	-	-	-	-	-
Cybercrimes	-	-	-	-	-	-

Source: Namibia National Risk Assessment.

- In Somalia, the NRA confirmed that between 2017 and 2019, 25 human trafficking cases were investigated but there are no comprehensive statistics provided on investigations, prosecutions, or convictions of HT/MS or related crimes.
- In the 2021/22 Annual Report of its Financial Intelligence Centre, South Africa provided a table on proactive and reactive financial intelligence reports produced by crime type, noting that 20 reactive and five proactive HT/MS reports were filed. A case study was also provided where the FIC responded to an urgent request from law enforcement to issue directives on the bank accounts of a subject who was suspected to be involved in a human trafficking syndicate. Although the investigation is still ongoing, collaboration between law enforcement agencies was said to be key to the success experienced in the case thus far.
- For Nigeria it was reported that between 2010 and 2014 a total of 1624 human trafficking and sexual exploitation cases were investigated, with 191 convictions. Monetary assets detected were valued at (Nigerian Naira) N7,356,960 (\$24,523.20) and monetary assets investigated were valued at N2,963,085 (\$9,876.95). Sixteen physical assets were detected and recovered; six physical assets were confiscated; and 11 physical assets were forfeited. Sixteen cases were noted where intelligence was received from the Nigerian Financial Intelligence Unit (NFIU), and ten cases were noted where feedback was provided to the NFIU. The total sum of monetary assets detected between 2010 and 2014 was N7,356,960 (\$24,523.20), while the sum of N2,963,085 (\$9,876.95) was associated with monetary assets investigated.<sup>54</sup>

Table 5: Number of Financial Intelligence Disseminated on Predicate Crimes by NFIU

Type of offence	2015		2016		2017		2018		2019		Total	
	Total	%	Total	%	Total	%	Total	%	Total	%	Total	%
Corruption	109	46%	355	68%	194	56%	246	54%	205	54%	1109	57%
Fraud	67	28%	72	14%	100	29%	155	34%	100	26%	494	25%
Tax evasion	23	10%	26	5%	17	5%	19	4%	18	5%	103	5%
Terrorism financing	5	2%	42	8%	9	3%	4	1%	27	7%	87	4%
Human trafficking	9	4%	12	2%	14	4%	18	4%	9	2%	62	3%
Drug trafficking	14	6%	9	2%	2	1%	11	2%	11	3%	47	2%
Treason	2	1%	3	1%	2	1%	2	0%	4	1%	13	1%
Arms smuggling	3	1%	1	0%	3	1%	..	0%	..	0%	7	0%
Terrorism	4	2%	..	0%	..	0%	..	0%	1	0%	5	0%
Economic/financial crime	..	0%	..	0%	..	0%	2	0%	3	1%	5	0%
Theft/robbery	2	1%	..	0%	1	0%	..	0%	1	0%	4	0%
Cybercrime	..	0%	2	0%	..	0%	..	0%	1	0%	3	0%

<sup>54</sup> Inter-Governmental Action Group against Money Laundering (GIABA), *Anti-money laundering and counter-terrorist financing measures – The Federal Republic of Nigeria, Mutual Evaluation Report* (Dakar: GIABA, 2021), p. 193.

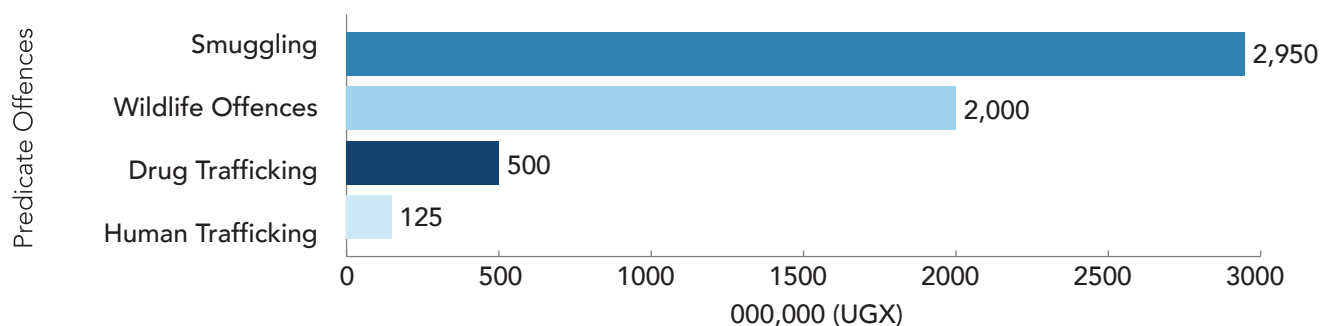
Type of offence	2015		2016		2017		2018		2019		Total	
	Total	%	Total	%	Total	%	Total	%	Total	%	Total	%
Kidnapping	..	0%	..	0%	1	0%	..	0%	2	1%	3	0%
Illegal oil bunkering	1	0%	..	0%	1	0%	..	0%	..	0%	2	0%
<b>Total</b>	<b>239</b>	<b>..</b>	<b>522</b>	<b>..</b>	<b>344</b>	<b>..</b>	<b>457</b>	<b>..</b>	<b>382</b>	<b>..</b>	<b>1944</b>	<b>..</b>

Source: Nigerian Financial Intelligence Unit.

- It is worth noting that Nigeria’s HT/MS rating is medium, but it is ranked 32<sup>nd</sup> for prevalence in the 2018 Global Slavery Index out of 167 countries, with an estimated 1,386 000 absolute number of victims. According to the *2022 Trafficking in Persons Report*, HT/MS in Nigeria appears to be on the rise.
- In Uganda, the NRA gives statistical data on the prevalence of HT/MS. The reported data points to

Uganda as a source country for victims trafficked to South Africa, Kuwait, DRC, Malaysia, India, UAE, Iraq, China, and Saudi Arabia, among others. Uganda is also a destination for HT/MS victims from Somalia, Rwanda, Burundi, South Sudan, and the United Republic of Tanzania. Over 800 cases of trafficking were reported in 2013 alone. Below<sup>55</sup> are excerpts of the tables included in the NRA.

Figure 6: Estimated Amount of Proceeds Generated Annually in Uganda



Source: Uganda National Risk Assessment.

Table 6: Human Trafficking Reported Cases and Prosecutions in Uganda

Predicate Offence	LEA	2010	2011	2012	2013	2014	Total
Human trafficking reported	UPF		64	97	159	105	425
Human trafficking prosecutions	UPF				43		43

Source: Uganda National Risk Assessment.

55 Republic of Uganda Financial Intelligence Authority, *Money Laundering and Terrorist Financing National Risk Assessment Report 2017* (Kampala: Uganda Financial Intelligence Authority, 2018), p. 20.

- There are countries that provided HT/MS related statistics even though they did not rate HT/MS risks. These include Cameroon, Republic of Congo, Senegal, Sudan, and Togo which reported on confiscations. For instance, the Cameroon Mutual Evaluation report made reference to the country's NRA report and the 2019 Statistics Bulletin figures. It indicated that Cameroon tracked the number of HT/

MS cases presented for trial in a judicial year (including open cases from the prior year), cases tried during the year, the number of convictions, and the number of outstanding cases (see Table 6 below).<sup>56</sup> However, although HT/MS is said to generate enormous illicit revenues, the total number of cases entered for trial resulting in conviction is low relative to other predicate offences.

Table 7: Cases Entered for Trials in Cameroon

Cases Entered for Trial					
Offences	Old at the start of the judicial year	New during the judicial year	Tried during the judicial year	Of the tried cases, how many led to a conviction	Outstanding cases to be tried at the end of the judicial year
Corruption	72	430	278	170	224
Misappropriation of public funds	375	236	270	120	341
Scam	1,660	2,428	2,778	2,064	1,310
Aggravated scam	215	179	290	289	104
Drug trafficking	711	1,055	1,258	1,237	508
Possession of narcotic drugs	1,852	2,037	2,030	2,003	1,859
Child trafficking	20	18	25	16	13
Human trafficking	9	4	7	2	6
Counterfeit money	39	86	63	58	62
Counterfeit drugs	62	107	151	148	18
Cybercrime	8	115	119	113	4
Money laundering	3	1	1	0	3
<b>Total</b>	<b>5,026</b>	<b>6,696</b>	<b>7,270</b>	<b>6,220</b>	<b>4,452</b>

Source: GABAC Cameroon Mutual Evaluation Report, 2022.

<sup>56</sup> The Task Force on Anti-Money Laundering in Central Africa (GABAC), *Anti-Money Laundering and Counter-Terrorist Financing measures – Republic of Cameroon Mutual Evaluation Report 2022* (Libreville: GABAC, 2022), pp. 70–71.

## Financial Inclusion of HT/MS Victims and Survivors in NRAs

- A number of NRAs have dedicated sections for financial inclusion and mechanisms to address vulnerability. Although, these do not specifically target HT/MS. Based on our review, Burkina Faso, Benin, Mali, and South Africa make specific mention of financial inclusion measures within the context of HT/MS.
- Burkina Faso's NRA states that "the scale of the informal sector, the shadow economy as well as the increased use of the parallel foreign exchange market where currencies are traded manually, and the unregulated and uncontrolled remittances services, coupled with the poor traction of financial inclusion products have increased both ML [Money Laundering] and TF [Terrorism Financing] risk." Benin refers to informal economies as a contributing factor and mentions that the predominance of informal economic activities and the porous nature of its borders are vulnerabilities that are exploited by criminals and their associates to carry out a number of criminal activities identified in the NRA report as major illicit proceed-generating activities, including HT. Mali flags its cash intensive economy and large informal sector, which contributes 40–50 per cent of GDP, as a contributing factor. The South African Anti-Money Laundering Integrated Task Force (SAMLIT), a Public Private Partnership to combat financial crime, has established an expert working group on human trafficking which is exploring the creation of survivor bank accounts.
- A number of jurisdictions highlight the large informal sector and cash-based economies that limit the availability of information and data which is necessary to identify, monitor, assess, and trace illicit funds. For instance, the United Republic of Tanzania reported that traffickers subject children to forced labour on farms (including as cattle herders and occasionally as hunters), in gold and gemstone mines and quarries, and in the informal commercial sector. Togo points to a large informal sector with widespread use of cash for transactions, which makes illicit financial flows easier. Niger highlights a low banking rate of 6.8 per cent, while the informal sector accounts for 60 per cent of GDP. Due to the nature of the cash intensive economy, most transactions are conducted through other channels such as foreign exchange bureaus and money transfer companies.
- The current study does not comprehensively address the financial inclusion of vulnerable persons or groups in NRAs. It is therefore recommended that a more in-depth review be undertaken to understand the overall approach to financial inclusion and vulnerable customers in NRAs within sub-Saharan Africa, and how financial inclusion can be leveraged to address HT/MS victims and survivors. Sub-Saharan Africa has many types of vulnerable groups and there is a need to explore how current regulatory provisions and wider financial inclusion strategies within each country can be leveraged to cater for the victims and survivors of HT/MS. A more in-depth analysis should consider both the financial crime and conduct risk issues related to the financial inclusion and exclusion of HT/MS victims and survivors.

# Overall Observations

- It is encouraging that 79 per cent of countries in the Sub-Saharan Africa region have NRAs. Notwithstanding, countries are at different levels of maturity when it comes to addressing HT/MS risks in NRAs.
- Determining the scale of HT/MS appears to be a challenge for a number of jurisdictions.
- Although there is positive traction in initiatives to combat HT/MS in Sub-Saharan Africa, more needs to be done to ensure the effective detection, investigation, prosecution, seizure, and confiscation of proceeds derived from HT/MS.
- Some countries make little or no reference to HT/MS risk, yet international sources like the *Global Slavery Index and the 2022 Trafficking in Persons Report* point to high prevalence of HT/MS in those jurisdictions. This may be an indication that the relevant countries may not be aware of the extent of the problem in their jurisdictions and regions, or attention may be directed at other priority crimes.
- In other countries, the authorities are broadly aware of the scale and scope of these criminal enterprises but understanding of the attendant money laundering risk is not commensurate with the complexity, materiality, and scale of these offences.<sup>57</sup>
- Agility is required in the NRA process to proactively manage risk. Some of the reviewed NRAs are dated, while others do not capture the nature of the evolving risk.
- Earlier research by the UNODC points out that HT/MS could not occur on a large scale without corruption. It notes that “trafficking in persons and corruption are closely linked criminal activities, whose interrelation is frequently referred to in international fora.” However, the linkages between the two crimes are mostly overlooked in the actual development and implementation of anti-trafficking policies and programmes.<sup>58</sup>
- In the reporting on HT/MS risk, it is evident that there is a conflation of trafficking with other crimes.<sup>59</sup> Due to the nexus between HT/MS and money laundering, some law enforcement agencies opt to pursue criminal prosecution for the predicate offence of HT instead of charges of money laundering which require evidence around financial flows.
- Ultimately, while the scope of this study focused on NRAs, it is important for countries to have an integrated approach in tackling HT/MS comprehensively. NRAs, HT/MS Strategic Plans, National Action Plans, the results of Mutual Evaluation Reports, and activities of all relevant agencies must be aligned to avoid fragmented and disjointed approaches.

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57 Inter-Governmental Action Group against Money Laundering (GIABA), *Anti-money laundering and counter-terrorist financing measures – The Federal Republic of Nigeria, Mutual Evaluation Report* (Dakar: GIABA, 2021), p. 135.

58 UNODC, *Global Report on Trafficking in Persons* (New York: United Nations, 2022), p. 47.

59 US Department of State Office to Monitor and Combat Trafficking in Persons, *Trafficking in Persons Report Namibia* (Washington, DC: US Department of State, 2022), p. 189.

# Recommendations & Conclusion

- **Promote platforms to share lessons and best practices across Sub-Saharan Africa.** There are several good examples across Sub-Saharan Africa of countries that address HT/MS comprehensively in NRAs, and there is an opportunity to learn from their best practices and lessons via platforms that are promoted and supported across the region.
  - **Entrench NRAs as foundational tools to identify, assess, and understand HT/MS risk and to inform response strategies and resource prioritization.** National Action Plans should be a response to a country's identified and emerging risks, threats, and vulnerabilities. The presence of HT/MS plans and HT/MS coordinating committees in circumstances where the country's NRA does not see HT/MS as a current or emerging threat or vulnerability is likely to result in a lack of prioritization or lackluster implementation. It is important to avoid the 'tick box' adaptation of HT/MS plans without necessary reflection of the HT/MS country risk in the NRA. Proper risk assessments will assist in the prioritization of investigations and prosecutions.
  - **Adopt agile approaches to NRA processes.** NRAs need to be reviewed within appropriate intervals to address emerging risks and to inform appropriate response strategies and prioritization.
  - **Prioritize development of typologies and red flags.** There must be prioritization of the development of more typologies and the unpacking of sectors, channels, forms, participants, processes, ministries /departments/agencies, or other means through which HT/MS-related ML/TF occurs. Red flags to identify suspicious transactions and activities must be developed and shared to assist in the production of Suspicious Transaction Reports (STR), Suspicious Activity Reports (SAR), and intelligence reports for proactive and reactive dissemination to law enforcement agencies. Such information will enhance the financial intelligence that is necessary for court evidence, to trace the proceeds of crime, and to support successful prosecutions.
  - **Ensure timely and effective information sharing, coordination, and cooperation.** There must be structured mechanisms for the flow of information from law enforcement agencies to FIUs and then to the financial sector to refine detection models and detection rules. The goal must be to interrupt money flows generated from HT/MS, increase the number of cases investigated, increase prosecutions and convictions, and enable remedy for victims. There must be well structured cooperation and information sharing mechanisms between the responsible agencies. Where HT/MS falls under the custodianship of another government department or agency, there is a need for closer and structured collaboration with FIUs to ensure on-going information sharing. As FIUs share financial intelligence, the relevant agencies can share their insights with the FIU, gleaned from their investigations and experiences around the evolving modus operandi of criminals and typologies in relation to HT/MS. The current approach to combatting HT/MS is often fragmented, with different agencies holding the mandate and no structured collaboration in relation to the sharing of data and intelligence.
  - **Ensure availability of comprehensive statistical data.** Statistical data on HT/MS-related money laundering and predicate offences should be collected and published to demonstrate the number of STRs logged, the number of investigations, prosecutions, convictions, and confiscations, as well as total asset freezes and their related values. It is important to demonstrate the use of financial intelligence received to support justice and redress for victims.
- It is also important to have statistical data or information on the proceeds of HT/MS or income derived from HT/MS to gain a deeper understanding of the extent of the commercialization of HT/MS and the extent of illicit proceeds.<sup>60</sup> Some jurisdictions have used the absence of statistical data or cases as a basis for a lower or moderate rating of HT/MS despite other extraneous data like the *Global Slavery Index* and the *2022 US Trafficking in Persons* report painting a very different picture.

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60 Inter-Governmental Action Group against Money Laundering (GIABA), *Anti-money laundering and counter-terrorist financing measures – Togo, Second Round Mutual Evaluation Report* (Dakar: GIABA, 2022), p. 41.





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