Human Trafficking and Modern Day Slavery Typologies and Red Flags

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Isle of Man
Financial Intelligence Unit
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Introduction

The Isle of Man Financial Intelligence Unit (FIU) has produced this typologies document as part of its strategic objective to improve sector-wide understanding of the financial risks associated with human trafficking and modern day slavery (HT & MDS). This initiative supports the Island's international obligations under FATF Recommendation 29, which requires Financial Intelligence Units to develop and disseminate information that helps identify and assess threats related to money laundering (ML), Terrorist Financing (TF), Proliferation Financing (PF) and associated predicate offences.

It builds on the Human Trafficking and Modern Slavery Indicators and Red Flags Document, published in 2020.

Part of this typology document, focused on multiple occupancy, was developed in conjunction with the Banking Operational Group of the Isle of Man Financial Crime Partnership (IOMFCP).

The typologies and indicators presented here are based on:

⇒ Analysis of suspicious activity reports (SARs) and other intelligence received by the FIU,

⇒ Open-source intelligence (OSINT),

⇒ Input from the Banking Operational Group of the IOMFCP.

While most examples are anonymised or fictionalised, they are grounded in real intelligence and reflect typologies observed both within the Isle of Man and internationally in practice or considered plausible based on existing risk assessments. These examples are intended to assist professionals across a range of reporting sectors in identifying and responding to suspicious activity potentially linked to HT & MDS.

This report contains information relevant to all sectors, however it will be particularly useful for professionals in:

⇒ Banking

⇒ Trust and corporate service providers (TCSPs)

⇒ Virtual Assets

⇒ Money Transmission Services

"A typology is the study or systematic classification of types that have several characteristics or traits in common"

-ECOFEL

What is Human Trafficking and Modern Day Slavery?

HT/MDS is defined within The Palermo Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children[1] as:

"The recruitment, transportation, transfer, harbouring or receipt of persons, by means of the 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 of the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or the removal of organs" .

The Palermo Protocol was adopted by the United Nations on 15th November 2000 and to date has been ratified by 183 countries[2].

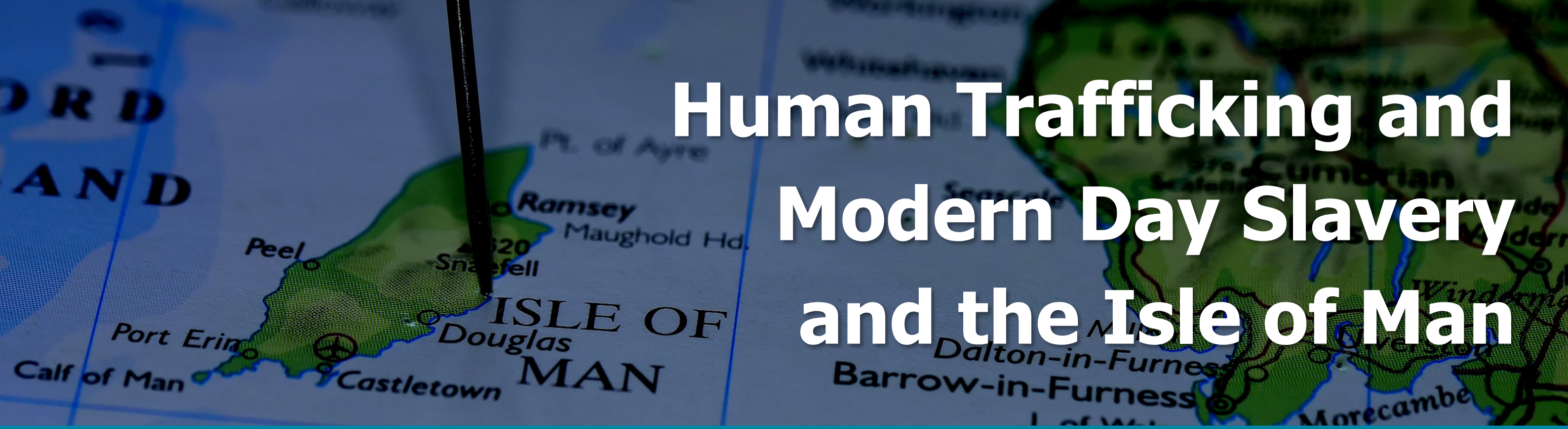
The scale of Human Trafficking ("**HT**") and Modern Day Slavery ("**MDS**") increases each year. It is estimated that around 50 million people around the world are currently held in MDS. HT generates approximately $500 billion dollars annually[3]. These figures are likely higher and are dependent on HT/MDS detection rates. HT/MDS is one of the most profitable illegal activities in the world with very few convictions.

Traffickers, whether an organised group or a single person, leverage various push and pull factors to put victims in a position where they can control and exploit them. Pull factors may include promises of accommodation or lucrative employment. Push factors may include conflicts or natural disasters causing mass migration of a population seeking safety.

Identification and reporting of HT/MDS is vital as the risk of harm for the victims being exploited is high. Identification of perpetrators/victims of HT/MDS commonly occurs through the analysis of financial information.

Detailed and accurate reporting of suspected HT/MDS to the FIU enables intelligence to be passed to relevant law enforcement agencies ("**LEA's**") in the jurisdictions where victims are present, with the aim to investigate and move victims from the control of bad actors to safety.

1. United Nations: Palermo Protocol
2. United Nations: Palermo Protocol resolution ratification
3. https://stopthetraffik.org/report/annual-impact-report-2024/



Human Trafficking and Modern Day Slavery and the Isle of Man

Jurisdictional Context

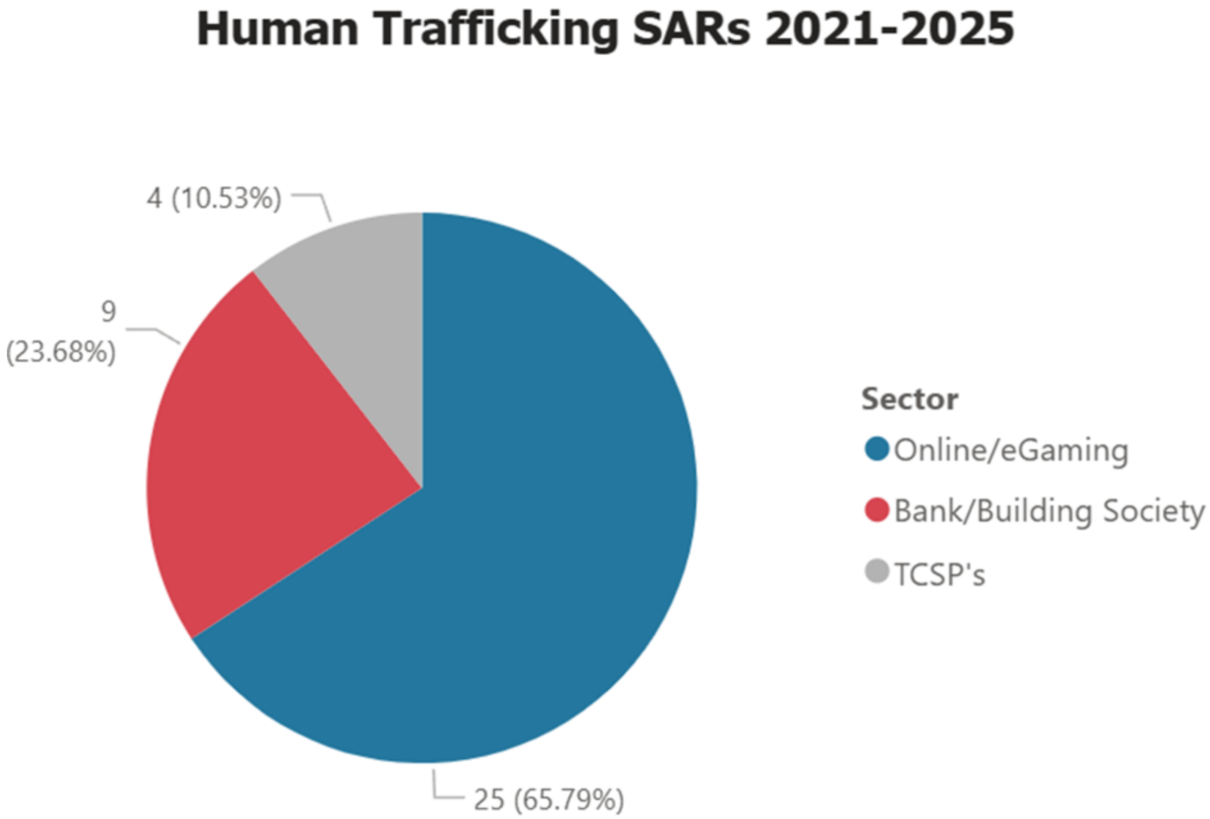
The Isle of Man ("IOM") is an international finance centre ("IFC") and therefore is at risk of being used as a transit jurisdiction for the proceeds of HT/MDS as well as being a location for predicate HT/MDS activity. Bad actors may aim to use the IOM financial system to place, layer or integrate the proceeds of this type of crime. The regulated sectors must therefore be aware of the different risks posed to the IOM by individual and organised groups of traffickers, and how legitimate services provided can be misused.

In the IOM, HT is a criminal offence. Specific provisions relating to these offences are noted under the Organised and International Crime Act 2010.

The IOM ML national risk assessment (2026) ("NRA") states that the HT risks to the IOM is increasing.

SAR Statistics

Between 1st of January 2021 and the 31st of December 2025, the IOM Financial Intelligence Unit ("FIU") received 42 suspicious activity reports (SARs) where the suspected criminality of the disclosure was HT or MDS. Whilst the grounds for forming these suspicions were varied, 26 were based on open-source checks. The top three sectors on the IOM that reported suspected instances of HT/MDS, or funds suspected to be associated with HT/MDS, were the online/eGaming sector submitting 25 SARs, the banking sector submitting 9 SARs, and the Trust and Corporate Service Provider ("TCSP") sector submitting 4 SARs during this period.



4. https://counteringfinancialcrime.im/media/hise0pt0/money-laundering-nra-march-2026.pdf

Red Flag Indicators

HT/MDS or the transfer of funds linked to HT/MDS can be difficult to identify. Potential red flags are detailed below. The red flags can apply to both the traffickers and the victims of traffickers as they are forced to engage in criminality.

Behavioural

- ⇒ Individual does not have control / possession of their own identity documentation.
- ⇒ Individual presents with signs of physical abuse or appears malnourished / scared.
- ⇒ Individual reads their personal details from a script / form.
- ⇒ Accompanied by a 3rd party due to a language barrier. The 3rd party won't allow the individual to speak.
- ⇒ Individual making statement alluding they are involved or associated with criminal activity.
- ⇒ Individual is unable to provide a residential address or insists on using a PO Box address.
- ⇒ Difficulties contacting a customer or a business.
- ⇒ Indicators that a residential/business address is being used for commercial sexual activity.

Customer Due Diligence

- ⇒ Adverse open-source media identified for an individual linking them to HT / MDS.
- ⇒ Indications that business documents or application forms have been completed by a third party.
- ⇒ Phone number or email associated with an individual is linked to escort or adult services websites / advertisements.
- ⇒ A customer's address is within a known red-light district or buildings where commercial sex work is known to occur.
- ⇒ Multiple customer accounts opened for different people using the same phone number or email address.
- ⇒ Unusually high number of unrelated individuals residing at the same address.
- ⇒ Account owners are unaware of account activity when questioned or cannot provide supporting documentation such as invoices.
- ⇒ Individual has a 3rd party mandate to undertake transactions on behalf of several account holders.
- ⇒ An owner / director of a company has control of many business accounts for one or multiple companies.

Transactional

- ⇒ Payments made to advertisers of illicit services.
- ⇒ Purchases made to suppliers of online anonymity tools such as VPNs.
- ⇒ Purchases made to suppliers of software for capturing video from websites or other online platforms.
- ⇒ Account turnover or business profits are unusually high, and not in line with expectations.
- ⇒ Large payments with generic references including but not limited to 'health' 'wellness' or a referencing a specific medical clinic.
- ⇒ Large payments to a health clinic in a high-risk country for HT with no reasonable explanation.
- ⇒ Income of a personal account is significantly higher or lower than expected.
- ⇒ Payment made or received from recruitment agencies associated with HT/MDS.
- ⇒ Purchase of multiple rooms in different hotels on the same night.
- ⇒ Frequent payment for travel expenses to / from high-risk countries.
- ⇒ A business making cash deposits way outside of hours employees would usually be expected to be working.
- ⇒ Cash deposits made at multiple locations or an individual making regular cash deposits outside of the Isle of Man when they are recorded to be an Isle of Man resident.
- ⇒ Rapid transfer of funds through customers' accounts.
- ⇒ Immediate transfer of all or most of the customer's salary soon after it is paid to an unrelated third party, with minimal day to day living expenses evident.
- ⇒ Unexplained payments to high-risk jurisdictions for modern slavery.
- ⇒ Frequent payments made to top up online cryptocurrency wallets.
- ⇒ General expenditure for a customer's account is excessive and suggests a customer's account is being used to support multiple people.

This list should not be considered exhaustive, and single red flag indicator of any type may not be indicative of HT/MDS and instead may point towards a different type of predicate offending, or activity that can be explained by the customer. However, when there are multiple red flag indicators, or these indicators are combined with an individual employed or associated with an occupation commonly linked to HT/MDS this could indicate that this person may be a victim of HT/MDS or a trafficker. Additionally, an individual where HT/MDS red flag indicators have been identified, who is also present in or associated with a HT/MDS high-risk country, is more likely to be a victim of exploitation, or a bad actor that may be exploiting others illegally for their benefit.

Higher Risk Industries and Countries

Higher Risk Jurisdictions

Certain jurisdictions present a higher risk of HT/MDS occurring, and it would be an advantage for businesses to consider this as part of their customer risk assessment. Transactions or customers present in, or associated with these countries should be subject to additional scrutiny, particularly if other red flag indicators previously highlighted are present. A higher risk countries list should be based on current national crime statistics relevant to the business's areas of operation. Consideration when creating this higher risk country list should also be given to displacement events such as conflicts and environmental disasters, which can make people more vulnerable to exploitation. Creating flags for customers who are at a higher risk of being associated or involved with HT/MDS at take on or during periodic/event driven reviews can aid with identification.

Higher Risk Industries

Certain industries have a higher risk of being exploited by bad actors wishing to profit from the proceeds of HT/MDS. These industries have traditionally been those that involve a large amount of cash transactions, and industries that employ many unskilled workers.

In addition, trend data indicates a growing uptake in cyber-focused fraud by bad actors. Large scale cyber scam operations disguised by front company structures are becoming more common, with the front structures often being linked to gambling activity. In June 2025, Amnesty International published a report that identified at least 53 confirmed scam compounds present in Cambodia[5]. Traffickers typically hold victims of HT/MDS in larger buildings or compounds forcing victims to engage in different types of fraud such as investment fraud, romance scams, and sextortion.

Victims held in scam compounds tend to be highly educated, usually to degree level. Traffickers recognise that a more credible, knowledgeable advisor, particularly when conducting investment scams is more convincing, and therefore more likely to be successful at defrauding others. Individuals able to use modern technology are also valuable to bad actors and vulnerable to exploitation as online / mobile platforms are usually the medium that is used to scam / extort others.

5. https://www.amnesty.org/en/documents/asa23/9447/2025/en/

Higher Risk Industries

- Construction
- Crop and Animal Production
- Forestry and Logging
- Fishing and Aquaculture
- Mining of Coal, Metal Ores or Precious Stones
- Manufacture of Tabacco Products
- Human Health and Social Care Services
- Health and Beauty Services
- IT Infrastructure or Support Services
- Travel or Tour Operation Services
- Manufacture of Textile Products
- Video, Sound or Music Production
- E-Gaming Software Supply Services
- Food and Beverage Service Activities
- Commercial Cleaning Services
- Manufacture of Food Products, such as Processing and Preserving of Meat, Fish, Crustaceans, Fruits and Vegetables
- Warehouse Activities to Support Cargo Handling
- Temporary Employment Agency Services
- Land and Water Freight Transport Services
- Other Personal Service Activities such as Activities Related to the Red-Light Industry, Massage Salons, Escort Services or Dating Services

This list should not be considered exhaustive.

Typologies: Labour Exploitation

Forced Labour

Forced labour is defined as involuntary work or services exacted under the menace of any penalty. This is a violation of an individual's civil rights. Traffickers will usually force victims to work excessive hours, sometimes more than eighteen hours a day. Traffickers often will pay victims a small wage, or no wage at all, violating workers' rights to fair pay. They may use debts for housing and food to maintain control over victims. These debts may be enforced with the threat of violence or actual violence.

Debt Bondage

Debt bondage is a mechanism where traffickers will deceive a victim to work for little to no payment by instigating a cycle of endless debt. This may include travel expenses, housing or food costs, and any other expenses, real or not, the victim believes they owe the trafficker.

Domestic Servitude

Domestic servitude usually involves victims working in a private residence. They may have been trafficked from other countries. Victims may be ill-treated, subjected to unbearable conditions, or made to work for little or no pay. This is much harder than most types of MDS to detect due to the exploitation taking place in a private residence. Domestic servitude can include elements of debt bondage. A key indicator can be an individual that is accompanied on a visit to the bank and not having control of their personal documentation.

Typology 1: Human Trafficking for Labour Exploitation

Mrs Azure leases a restaurant on the IOM. This is a commercial premise, and the IOM estate agent Fuchsia Firm receives funds on behalf of its client for leasing the property. Fuchsia Firm visited the premises to renegotiate the lease with Mrs Azure and check the condition of the property. A representative from Fuchsia Firm noticed that used mattresses were present in a back room and none of the staff members spoke English. The representative from Fuchsia Firm observed several passports scattered on Mrs Azure's office desk, at the back of the restaurant, and noticed that one was open and belonged to one of the workers. The representative of Fuchsia Firm formed a suspicion that the restaurant workers were potential victims of HT and were being forced to work in the restaurant. Fuchsia Firm were suspicious that the funds they had received from Mrs Azure to pay for the lease were the proceeds of HT/MDS and therefore submitted a SAR to the FIU, in addition to directly reporting the matter to the police.

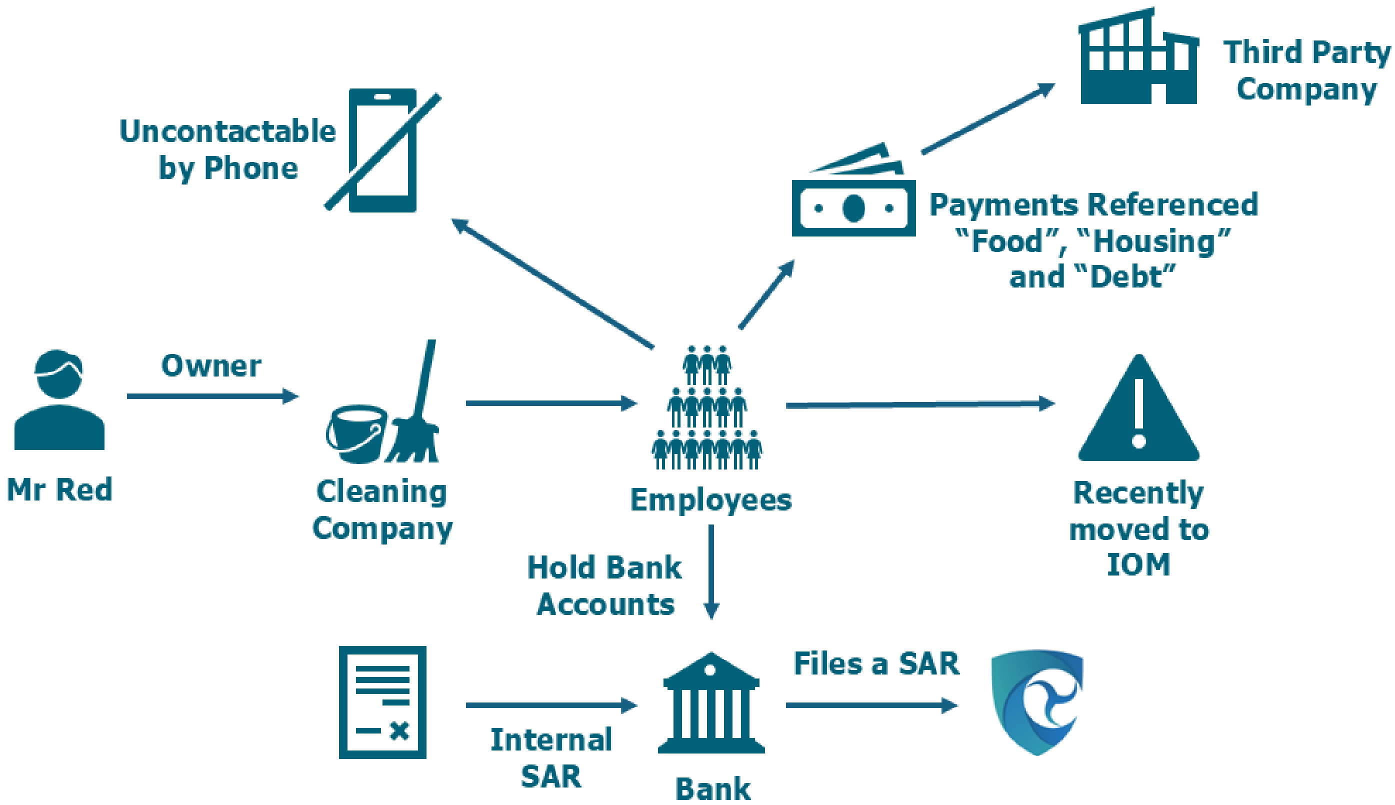
Red Flags

⇒ **Evidence of employees sleeping/ living out of a commercial premise**

⇒ **Employer in possession of passports belonging to staff.**

Typology 2 – Debt Bondage

Mr Red owns Blue Company, a cleaning company in the IOM. Mr Red has several workers that have recently moved to the IOM from another jurisdiction. A number of these workers hold bank accounts on the IOM. The compliance team at this bank receives an internal SAR relating to an employee of Blue Company. The employee it is noted, has paid most of their salary over the past three months to a third-party company. Payment references include 'housing', 'food', and 'debt'. The compliance team upon further investigation notes that other individuals who work for Blue Company are engaged in similar transactional patterns. The bank attempts to contact the employees to seek an explanation but the numbers on file do not connect. The bank forms a suspicion the employees of Blue Company are potential victims of HT/MDS given they have recently moved to the Island, and their accounts exhibit signs of debt bondage. The bank submits a SAR to the FIU.



Red Flags

⇒ **Workforce primarily consisting of individuals new to the jurisdiction.**

⇒ **Higher risk industry (Cleaning)**

⇒ **Payment of most of received salary to a third party company.**

⇒ **Payment references to third party relating to housing and debts.**

⇒ **Provided contact details appear to be false.**

Typologies: Sexual Exploitation

Sexual Exploitation

Sexual exploitation takes many forms. This includes, but is not limited to sexual exploitation, forced prostitution and the abuse of children to produce child sexual abuse material ("CSAM").

A person who is trafficked for the purpose of sexual exploitation may be controlled by violence, threats, substance abuse, deception, or grooming. Victims can be any gender, race, or age and exploitation can take place in brothels, hotels, or in a residential setting. Victims can be involved in forced marriages and prostitution.

Sexual exploitation often has a financial element and can be conducted to obtain financial gain.

Child Sexual Abuse Material; Production, Distribution, and Purchase

The production, distribution and purchase of CSAM involves the sexual exploitation of children in some form. Bad actors will abuse children, filming instances of child abuse to profit from the material. Families may also abuse their own children and sell the material to bad actors to distribute. Children can be groomed, coerced or threatened into producing CSAM by an adult either in person or over the internet.

Artificial Intelligence ("AI") generated CSAM has become more common with advances in technology. AI models can generate or alter existing images to produce CSAM that is now increasingly similar to genuine material. While AI generated CSAM might not always involve the exploitation of a child by a trafficker, the material still contributes to the objectification and sexualisation of children. Due to the difficulty in confirming if the material is artificially generated or involves a real victim, AI generated CSAM poses a real challenge for investigating agencies.

Typology 3: Laundering of Funds from International Sexual Exploitation

Purple Firm, an IOM licenced TCSP acts as the trustee, for a Trust, that holds the deeds to an apartment in the UK. Purple Firm rents this property out to a Mr Silver. Purple Firm received a complaint from the UK property management company stating that a loud argument was overheard between Mr Silver and a young woman. The UK property management company also stated other residents had reported large numbers of guests visiting the apartment at all hours. Open-source information searches showed the apartment was listed on adult services websites. Purple Firm attempted to contact Mr Silver to clarify matters. Mr Silver refused to answer questions relating to the adult services websites links when questioned and terminated the call. Mr Silver did not engage with any follow up requests for information. Purple Firm formed a suspicion that Mr Silver was involved in sexual exploitation to benefit from prostitution suspected to be taking place at the apartment owned by the Trust. Purple Firm submitted a SAR to the FIU as they suspected that the rental fees, they had received were the proceeds of crime. Purple Firm arranged to evict Mr Silver from the apartment.

Red Flags

⇒ **Open source links to adult services websites.**

⇒ **Evasive Customer Behaviour**

Typology 4 – Laundering of Funds from Domestic Sexual Exploitation

Crimson Bank are based on the IOM. Crimson Bank opened a bank account for Mrs Gold who was accompanied by a 3rd party. The 3rd Party stated Mrs Gold didn't speak very good English. Mrs Gold appeared to read all answers to the bank staffs' questions from a piece of paper with writing in a different language. Mrs Gold deferred to the 3rd party when she was unsure. Mrs Gold stated she would be employed as a masseuse at a massage parlour. Six months after the account was opened a request to enable Mr Orchid to have full access to Mrs Gold's bank account was received. Mrs Gold confirmed Mr Orchid was her boyfriend via email. This acted as a trigger event and Crimson Bank reviewed the transaction activity to date, where multiple payments to adult services websites, purchase of recording equipment, and purchase of hotel rooms sometimes with multiple purchases in one day were identified. Cash deposits were identified but not a consistent salary. The cash deposits were paid away shortly after deposit to a third party and no payments for general expenditure were observed. Crimson Bank attempted to contact Mrs Gold to clarify matters as transactional activity pointed towards her being involved in prostitution. The call was answered by a gentleman and not Mrs Gold. Subsequent attempts to contact Mrs Gold were unsuccessful. Crimson Bank became suspicious that Mrs Gold was being sexually exploited by Mr Orchid or other individuals associated with Mr Orchid. Crimson Bank submitted a SAR to the FIU and directly reported the matter to the police.

Red Flags

- ⇒ Customer with and deferring responsibility to a third party.
- ⇒ Higher risk Industry.
- ⇒ Multiple transactions for hotel rooms and adult services websites.
- ⇒ Unable to contact customer directly, with calls directed to a third party.

Typology 5 – Laundering of Funds from CSAM

Miss Amber owns a recruitment agency that has recently relocated to the IOM. Miss Amber approached Indigo Firm to open a cryptocurrency account to pay salaries for her business that she states has international recruitment contracts. Miss Amber stated the reason she moved the business to the Isle of Man was due to its reputation as a reputable financial centre and availability of highly skilled workers to expand her business. Indigo Firm identified after three months that transaction volumes for the cryptocurrency account were higher than expected. Further investigation revealed that Miss Amber's company was using cryptocurrency mixing services to potentially obfuscate the source of funds being paid into the cryptocurrency account. The account was being accessed primarily by IP addresses in jurisdiction X. Indigo Firm noted that this was a jurisdiction at a much higher risk of HT/MDS occurring and the business activity was already considered high risk for HT/MDS. Indigo Firm attempted to meet with Miss Amber to seek clarification on their concerns. Miss Amber stated she was travelling. Follow up requests to meet and for information were deflected by Miss Amber. Indigo Firm began to suspect Miss Amber was not present on the Isle of Man and was in jurisdiction X. Indigo Firm blocked the account and engaged an external company to de-mix the funds they had received. The external company confirmed the funds were linked to cryptocurrency addresses associated with the production and distribution of CSAM in Jurisdiction X. Indigo Firm submitted a SAR to the FIU stating they suspected Miss Amber's recruitment agency was a shell company used to launder funds generated from the sale of CSAM.

Red Flags

- ⇒ Higher account activity than expected.
- ⇒ Evasive customer behaviour.
- ⇒ Higher Risk Industry and jurisdiction
- ⇒ Use of mixing services.

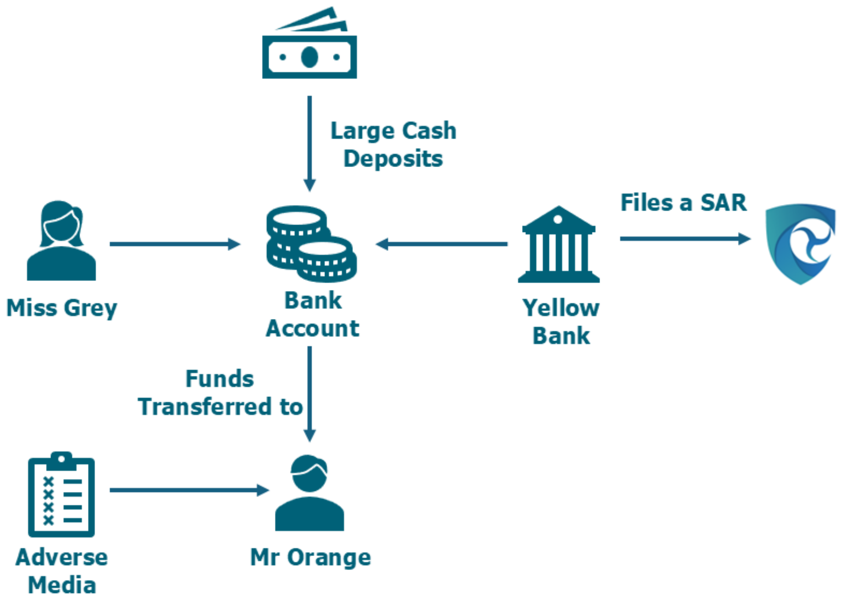
Typologies: Enforced Criminality

Enforced Criminality

Victims of HT/MDS may be forced into committing criminal acts by traffickers either through threats of violence, or actual violence. Traffickers may also make threats of violence towards the victim's family members. Enforced Criminality may take many forms, including working in a scam centre or acting as a money mule.

Typology 6—Enforced Money Mule Activity

Miss Grey is an Isle of Man resident in full time education. Miss Grey holds a bank account with Yellow Bank. Yellow Bank were notified by internal system controls that several large value cash deposits were paid into Miss Grey's bank account. The cash deposits were immediately transferred to Mr Orange's bank account, held with a different bank. Yellow Bank conducted open-source checks and identified that Mr Orange had previous convictions for drug trafficking offences. Yellow Bank branch staff stated they had observed Miss Grey making the cash deposits over the course of a week while in the presence of an unknown male. Yellow Bank attempted to contact Miss Grey seeking an explanation for the source of funds of the cash deposits and her connection to Mr Orange. Yellow Bank were unable to contact Miss Grey. Yellow Bank submitted a SAR to the FIU suspecting Miss Grey was a money mule for Mr Orange.



Red Flags

⇒ **Large unexplained cash deposits.**
⇒ **Immediate flow of incoming funds to a third party.**
⇒ **Open source adverse information on third party.**
⇒ **Customer is accompanied by a third party.**

Typology 7 — Scam Centres

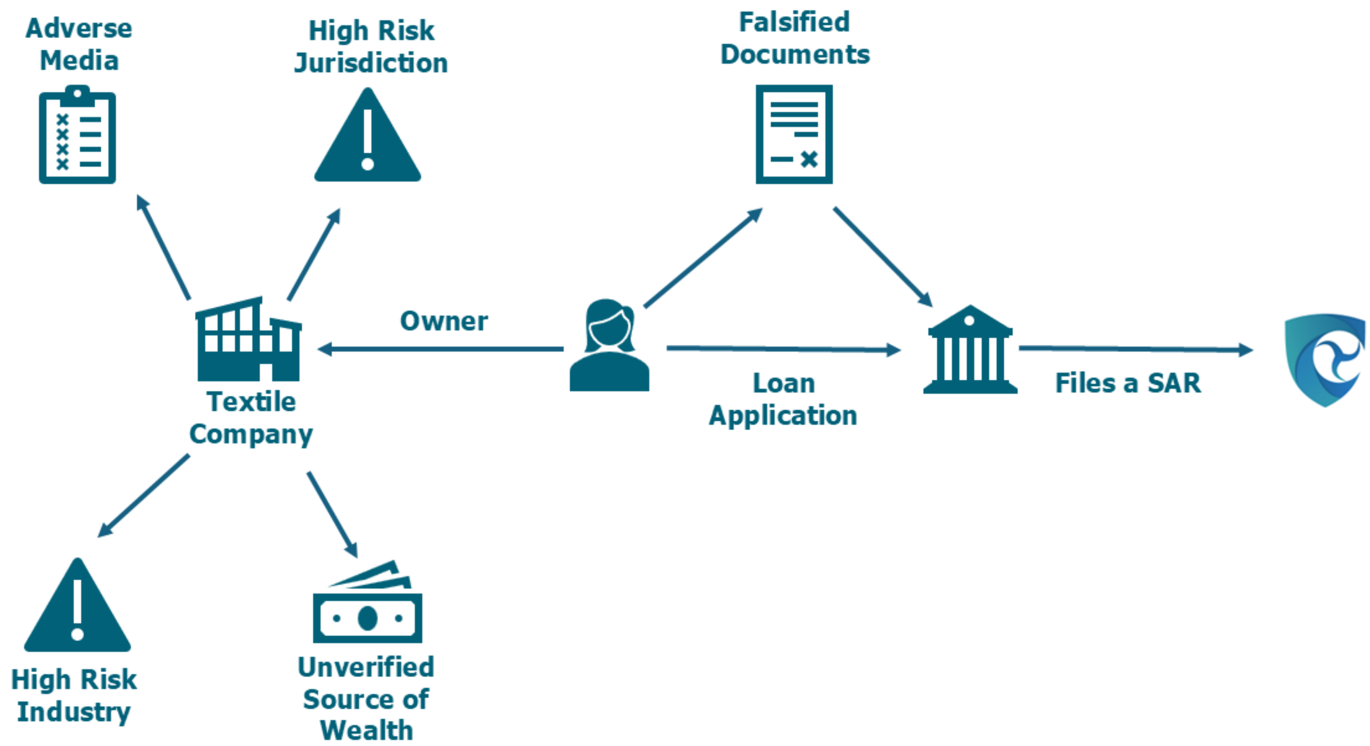
Rose Bank are an IOM domiciled bank that provide bridging loans to international clients. Rose Bank were approached by Mrs Scarlett who is the owner of a textile firm undertaking projects in Jurisdiction X. Mrs Scarlett wished to engage with Rose Bank and receive a loan for a construction project. Rose Bank, before providing the loan, completed enhanced due diligence on Mrs Scarlett and her construction company as per their company risk assessment.

Rose Bank reviewed Mrs Scarlett's source of wealth documentation and identified that Mrs Scarlett had stated she had received a large inheritance payment from her parents. The inheritance was invested in domain names that were sold for a large profit. These funds were then invested into real estate development projects that generated further immediate profits.

The trajectory of her wealth development appeared unrealistic as Mrs Scarlett had no experience in this field and yet was immediately successful. Initial wealth generation could also not be corroborated as Mrs Scarlett was unable to provide any documentation for the domain name sales. Invoices provided to Rose Bank for previous textile contracts completed were found to be fabricated even though the documents were certified by an acceptable certifier.

Open-source information searches for the company headquarters revealed that this was a walled compound and forum posts stated that workers were mistreated. Internal searches of Rose Bank's database also identified that a previous customer was exited by the bank on the suspicion they were engaged in MDS practices and running a scam centre. This customer had used the same phone number to open a bank account with Rose Bank.

Rose Bank suspected Mrs Scarlett was a proxy for an organised crime group and was seeking a bridging loan to launder the proceeds of crime generated through scam centres, using a legitimate front company. Rose Bank submitted a SAR to the FIU and declined the business.



Red Flags

- ⇒ Higher Risk Industries.
- ⇒ Rapid wealth accumulation with unrealistic explanation.
- ⇒ Falsified documentation.
- ⇒ Use of contact details seen before for an unrelated customer.
- ⇒ Adverse media.

Typologies: Multiple Occupancy

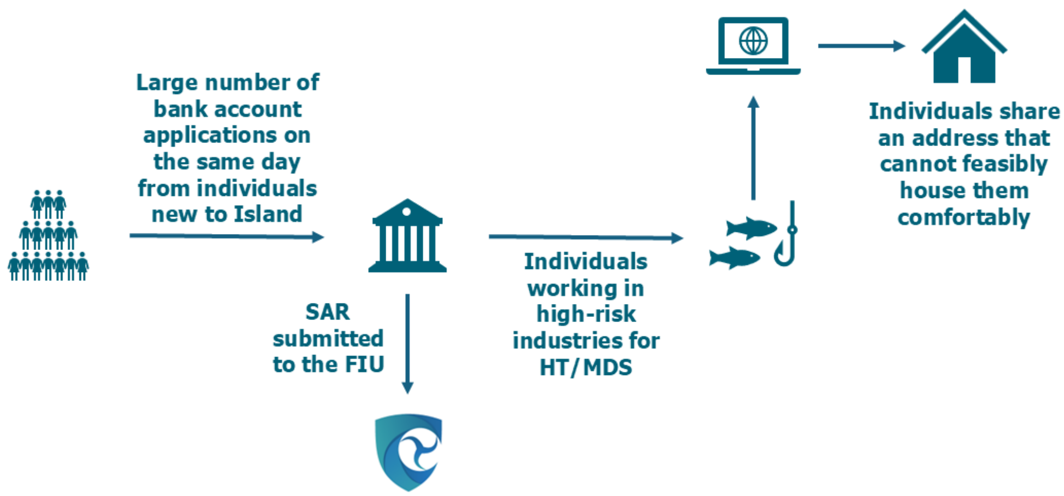
Multiple Occupancy

Multiple occupancy of a building by unrelated individuals can be a key indicator of HT/MDS. Traffickers will often place many people in a building more suitable for lower numbers to reduce costs. The Isle of Man Financial Crime Partnership (IOMFCP) Banking Operational Group developed the below typology as part of a project on Multiple Occupancy.

Typology 8: Multiple Occupancy

Teal Bank received five applications to open bank accounts on the same day from five Brazilian individuals. Teal Bank identified that all the individuals had provided tax reference documentation stating they would all be residing at Lilac House. The individuals had all recently moved to the Isle of Man. The individuals were accompanied to Teal Bank by the same translator at different times in the day. The individuals it was noted were not related and had stated they would be taking up employment in different sectors. These sectors were hospitality and fishing, which are considered high risk industries for HT/MDS.

Teal Bank took note of this, and searches of their system confirmed that another ten Brazilian customers holding bank accounts with the bank also stated they were living at Lilac House. Open-source information searches of Lilac House highlighted this was a three bedroom townhouse that couldn't possibly house fifteen individuals comfortably. Teal Bank submitted a SAR to the FIU suspecting Lilac House may contain victims of HT/MDS. Subsequent law enforcement action confirmed this was the case .



Red Flags

⇒ **Multiple Occupancy of an unsuitable property.**
⇒ **Higher risk industry.**
⇒ **Third party accompanying customers.**

Trafficking of Organs

Organ trafficking is the exploitation of individuals for their organs. In many cases victims may willingly consent to providing their organs to another party for financial gain. Most of the time the process involves deception. Victims whose organs are removed are either not financially compensated or not given the compensation expected. In 2007, the World Health Organisation estimated that between 5-10 % of all transplants used black market organs. The most harvested organs from victims of HT, are kidneys, followed by parts of the liver. Organ trafficking is lucrative, estimated to generate more than USD 1 billion annually according to the United Nations Office on Drugs and Crime[6].

A key indicator for organ trafficking are payments made referring to medical procedures that are not sent to recognised medical clinics or individuals receiving payments from third parties referencing medical procedures.

International Case Example

The UK Metropolitan police conducted an investigation that resulted in a Nigerian politician, his wife and a medical professional being convicted for conspiring to exploit a victim for the purposes of organ harvesting, in May 2023. This was the first conviction of its kind in the UK. The victim was trafficked to the UK, and their kidney was intended to be harvested for the politician's daughter who was a UK university student. She was suffering from kidney disease. The victim escaped and reported the matter to the police.

https://www.bbc.co.uk/news/65960515

6. https://www.unodc.org/unodc/frontpage/2024/June/explainer_-understanding-human-trafficking-for-organ-removal.html

Reporting Suspected HT/MDS

Financial Intelligence Unit

If you come across activity that you suspect relates to the proceeds of HT/MDS , or to the use of HT/MDS to fund terrorism or proliferation, you should make a report to the FIU via the Themis Reporting System.

Where you identify activity that could relate to HT/MDS, but have not reached the threshold to form a suspicion, you may wish to consider making a report to the FIU under Section 24 of the FIU Act 2016.

Further information on SAR reporting and the legislation options to use can be found in the FIU SAR Guidance.

Law Enforcement

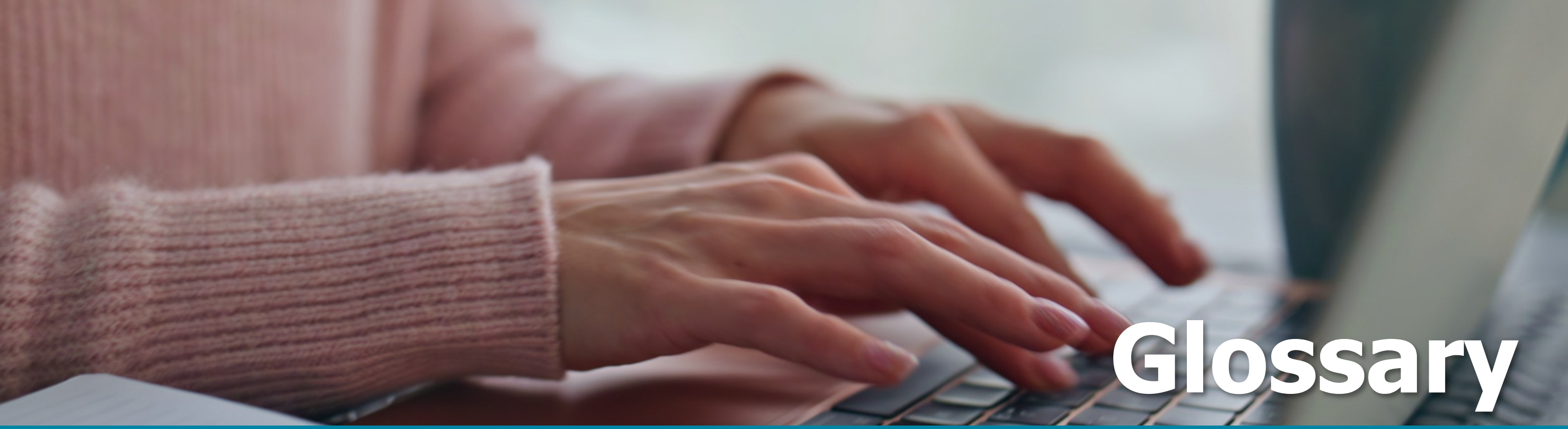
If you are a victim of HT or suspect HT is taking place in the Isle of Man:

⇒ In an emergency, immediately report to the police by dialling 999.

⇒ If you believe the incident is non-urgent call Police HQ on 01624 631212.

⇒ To pass on information anonymously call Crimestoppers on 0800 555 111, or fill out their secure, encrypted Anonymous Online Form.

⇒ You can also anonymously and securely report information via the "STOP" mobile application operated by the charity "Stop the Traffik ".



Glossary

⇒ **AI** – Artificial Intelligence

⇒ **CSAM** – Child Sexual Abuse Material

⇒ **FIU** – The Isle of Man Financial Intelligence Unit

⇒ **HT** – Human Trafficking

⇒ **IFC** – International Finance Centre

⇒ **MDS** – Modern Day Slavery

⇒ **ML** – Money laundering

⇒ **NRA** - National Risk Assessment

⇒ **Palermo Protocol** – The Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children

⇒ **PF** – Proliferation Financing

⇒ **SAR** – Suspicious Activity Report

⇒ **TCSP** – Trust and Corporate Service Provider

⇒ **TF** – Terrorism Financing

Resources and Links

- ⇒ [2020 FIU Human Trafficking and Modern Slavery Indicators]
- ⇒ [FIU Money Mules Typologies]
- ⇒ [FIU SAR Guidance]
- ⇒ [World | The Global Slavery Index]
- ⇒ [International Organisation for Migration - Displacement Tracking Matrix]
- ⇒ [Organised and International Crime Act 2010]
- ⇒ [Sexual Offences and Obscene Publications Act 2021]