How advanced is your anti-trafficking program?

STAGE 4

Innovating Industry Solutions

Institution defines strategy to take action on trafficking.

STAGE 3

Influencing Externally

Institution refines program based on industry learnings.

STAGE 2

Building Your Program

Institution looks internally to develop capabilities.

STAGE 1

Monitoring Ad-Hoc

Institution focuses on compliance without a formal anti-trafficking program.

CATEGORY

Category	Stage 1: Monitoring Ad-Hoc	Stage 2: Building Your Program	Stage 3: Influencing Externally	Stage 4: Innovating Industry Solutions
Data — Access to data.	AML integrates human trafficking data into workflows on an ad-hoc basis.	Human trafficking-specific indicators are systematically integrated into AML workflows.	External data provided by NGOs, law enforcement, or regulators specific to trafficking is proactively fed into internal monitoring and investigation process.	Internal and external data are automatically linked for AML teams to access insights through a reduced (or single) point of entry.
Technology — Use of data.	AML monitoring and investigation program incorporates requirements outlined in Bank Secrecy Act (BSA) and USA PATRIOT Act.	Transaction and customer monitoring typologies are developed based on human trafficking-specific criteria from historic patterns, FinCEN, or working groups.	Typologies are optimized when AML teams uncover new indicators and Compliance function evaluates whether new controls should be incorporated into the program.	Institution participates in industry-wide typology development involving researching, updating, and sharing findings on typology efficacy and changes with peer institutions.
Policy — Institution-wide emphasis on combating trafficking.	Anti-trafficking awareness is limited to Compliance function and customer-facing staff in mandated training.	Anti-trafficking awareness is delivered to Compliance and customer-facing staff to include industry learnings as they emerge.	Combating trafficking is a leadership priority demonstrated to staff through its inclusion in the code of conduct and its cause for disassociation with affiliated businesses.	Institution is involved in combating trafficking through community-oriented efforts like creating financial opportunity for survivors and changing federal law.
Collaboration — Cross-institution partnership.	Institution's interaction is limited to consuming information external groups publish.	Institution attends general compliance conferences to learn about red flags, data, and technologies.	Institution participates in human trafficking-focused conferences to learn about targeted strategies.	Institution proactively volunteers in anti-trafficking working groups and helps to develop anti-trafficking typologies for the industry.