**INNOVATIONS FOR
SUCCESSFUL SOCIETIES**

REACHING FOR A NEW APPROACH:
A NEWCOMER NGO BUILDS A NETWORK
TO FIGHT THE MODERN SLAVE TRADE, 2012–2018

SYNOPSIS

In the late 1990s and early 2000s, governments and activist organizations around the world set their sights on ending the business of human trafficking. Many groups emerged to assist victims of the crime, but few made progress toward eliminating the roots of the problem. Duncan Jepson, a lawyer for a Hong Kong–based bank, said he believed too little was being done to spotlight the shadowy criminal networks that typically crossed government jurisdictions and sometimes included otherwise legitimate businesses. Jepson decided that disrupting the trade in human beings required new types of collaboration to unravel criminal networks and confront the organizations that abetted their activities. In 2012, he founded a nongovernmental organization called Liberty Asia, which aimed to bridge institutional gaps and approach human trafficking from an economic perspective by using increasingly robust anti-money-laundering tools that were at the disposal of banks and bank regulators. This case profiles Liberty Asia's efforts and focuses on the challenges associated with coordinating many different types of organizations to confront a common challenge.

Ann Toews drafted this case study based on interviews conducted in March 2017 and January 2018. Case published March 2018.

INTRODUCTION

On a characteristically hectic workday in 2004, Duncan Jepson was at his desk in the Hong Kong office of ING Group, a multinational banking and financial services company. He had just seen a reminder to check for possible variations of Osama bin Laden's name, using ING's anti-money-laundering compliance software. The US government and its allies were determined to deny the world's most wanted man access to funds and had passed legislation in 2001 to ensure banks conducted due diligence in screening their clients. [1] To its existing list of 40 recommendations for addressing money laundering, the Financial Action Task Force (FATF), a multilateral initiative, had just added nine new measures on countering the financing of terrorism. Jepson, a career corporate lawyer who was also active on behalf of various social causes, questioned why the same level of vigilance had not been applied to stopping criminals other than terrorists and narcotics traffickers. Why were banks not taking advantage of powerful tools within the anti-money-laundering and terrorism-financing regimes to pursue persons complicit in forced labor, the world's third-most-profitable crime?

Jepson said he thought a major reason was a shortage of the kinds of information decision makers needed. He appreciated the importance of

the right sorts of detail not only because he oversaw complex mergers and acquisitions but also because he had a background in directing documentary films and writing novels with carefully researched story lines. During the next eight years, Jepson became increasingly convinced that the banks employing him possessed untapped potential to acquire the information needed to disrupt the environment in which exploitation—in its many forms—persisted.

The United Nations' 2000 Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, was the first international treaty to address human trafficking. It was one of three protocols that supplemented the United Nations Convention against Transnational Organized Crime, which was enacted at the same time. Under its terms, the crime of human trafficking had three constituent elements: an act, such as the recruitment or transport of victims; a means, such as the threat or use of force against the enslaved; and a purpose, such as forced labor.[2] Forced sexual activity, forced domestic work, or forced labor in the areas of agriculture, construction, mining, or other sectors were among the types of exploitation covered.[3] Aside from its cruelty, forced labor fed corruption and undermined the rule of law where it occurred.[4]

Jepson sensed that this "crime of crimes" persisted largely because it was lucrative and low-risk. Criminal networks could easily move capital, exploit differences in laws across jurisdictions, and leverage technology that enabled speedy transfers of assets to make their transactions appear legitimate, according to the United Nations Global Initiative to Fight Trafficking.[5] The International Labour Organization (ILO) estimated that 20.9 million people were in forced labor at any point from 2002 to 2011."[6] (Two years later, the ILO estimated that traffickers gained an estimated $150 billion in annual profit, mostly in Asia.[7]) Prevailing law-enforcement-focused strategies had failed to

bring people to justice,[8] and in some jurisdictions, police were part of the problem. Off-duty police officers often earned extra income by providing security for traffickers, according to the US State Department's Trafficking in Persons Report.[9] (See table 1.)

Jepson said he wondered why so few nongovernmental organizations (NGOs) had tried to partner with the financial industry to solve the problem. By working together, they could sharpen investors' aversion to risk and thereby reduce traffickers' opportunities to profit from criminal actions. The NGO world tended to focus on the *consequences*, which resulted in retroactive strategies to rescue and care for victims. That work was essential, but it made little progress in curbing the complex, fast-moving trade in human beings.

From his experience in bank regulatory compliance, Jepson knew that any attempt to weaken criminals' profit incentives by using the financial system's obligations under the anti-money-laundering framework and other legal mechanisms like it would require much more-detailed data than was then available. He had searched for such information and failed to find it, but he thought NGOs were well positioned to fill some of the gaps. At the time, NGOs' record-keeping practices were too unsystematic to be useful, but he felt it would be possible to improve the quality of the data the organizations collected and then channel the data to banks and other institutions that could act on it—and in some cases, were require to do so.

After many conversations with people working on anti-trafficking initiatives, Jepson decided to pursue the idea. In 2012, he founded Liberty Asia as a project within his existing Hong Kong–registered nonprofit, Share, which he had started two years earlier to improve the lives of youth in disadvantaged parts of Hong Kong. He gradually recruited a handpicked team of experts—funded by an early foundation grant—to develop a new approach to the human-trafficking problem.

Table 1. Estimates of Trafficked Persons				
Reference Period	Published	Trafficked Persons	Source	Methodology
1997	2000	70,000	US government	Unknown
1995–2004	2005	12,300,000	International Labour Organization	Capture–recapture sampling: "The estimate of reported cases is used to derive an estimate of the actual number of people in forced labor at the present time."[1]
2002–11	2012	20,900,000	International Labour Organization	"In order to improve the accuracy of the results and to provide estimates broken down by region and by form of forced labor, the data were stratified in terms of three categories: geographical region, form of forced labor, and type of data."[2]
2012–16	2017	24,900,000	International Labour Organization and the Walk Free Foundation	"Multiple data sources, household surveys, probabilistic modeling, and analytic reviews of secondary sources"[3]

Sources:
[1] Patrick Belser. "Forced Labour and Human Trafficking: Estimating the Profits." International Labour Office, 2005, http://www.ilo.org/wcmsp5/groups/public/---ed_norm/---declaration/documents/publication/wcms_081971.pdf.
[2] "ILO Global Estimate of Forced Labour: Results and Methodology." International Labour Office, 2012, http://www.ilo.org/wcmsp5/groups/public/---ed_norm/---declaration/documents/publication/wcms_182004.pdf.
[3] Liana Rosen. "Human Trafficking: New Global Estimates of Forced Labor and Modern Slavery."

THE CHALLENGE

Jepson said he wanted "to create infrastructure for the vulnerable that changed the system." Doing that required fostering a unique collaboration between NGOs, banks, and regulators to counter human trafficking. Specifically, Jepson's team wanted to build a network that would gather information and channel it to the right institutions, in order to change the way decisions were made. The most obvious path was to take advantage of the well-

established anti-money-laundering regime. The existing, robust set of anti-money-laundering tools could help ensure human traffickers were among the criminals blocked from moving the proceeds of their crimes into and through the formal banking system.

To pursue this approach, Jepson wanted to equip banks to block clients engaged in human trafficking by improving the volume and detail of information about traffickers' identities and their networks. If Liberty Asia could supply this

information to bank regulatory compliance departments through widely used financial crime risk databases like, for example, Thomson Reuters World-Check, banks would become better equipped to cut off traffickers' cash flows and weaken their profit incentives. (See text box 1.)

Liberty Asia's first effort to collect usable data had a rocky start. In mid 2012, the organization helped install a hotline as a way to collect the sort of actionable data needed. The idea was that

victims who called in would explain their situations, and the people on the receiving end would add the callers' information to a database. With a grant from Google LLC's charitable arm, Jepson's small team worked hard to make the hotline operational in Hong Kong, Cambodia, and Thailand within a few months.

But Jepson soon grew skeptical about whether the data the banks needed could be derived from victims' phone calls. He invited data

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Box 1. The Anti-Money-Laundering Regime

In 1990, the Financial Action Task Force (FATF), an intergovernmental body charged with developing policies to fight money laundering and combat terrorist financing (known by its acronym AML/CFT), began to require that banks adopt a number of practices, including reporting suspicious activities. In addition, FATF began to identify jurisdictions with weak ability to control money laundering and terrorist financing.[1] The task force's decisions drove the creation of corresponding national laws.

At the national level, financial-intelligence units were the central agencies charged with carrying out this global regulatory regime's work. They fought financial crime by receiving information on suspicious activity and transmitting it to the appropriate authorities. Nearly every country had such an agency, but the precise structure and function differed place to place. For example, under the Uniting and Strengthening America by Providing Appropriate Tools Required to Intercept and Obstruct Terrorism Act (USA PATRIOT Act), banks doing business in the United States had to review transactions for suspicious behavior; exercise due diligence in accepting foreign correspondent and private bank accounts; share information with law enforcement, financial intelligence units, and other financial institutions; and enhance due diligence for foreign correspondent and private bank accounts. Other types of companies, too, in addition to banks, were obliged to report suspicious activity. The US secretary of the treasury had the authority to impose "special measures for jurisdictions, institutions, or transactions" that were of "primary money-laundering concern."[2]

Compliance departments typically invested in risk assessment databases like Thomson Reuters World-Check or LexisNexis Acuity to help them assess potential and existing clients and to show national regulators that they were doing due diligence to stop money laundering and terrorist financing. This practice reduced the risk of hefty fines.

Beyond merely checking names, though, large banks employed compliance officers to analyze the full criminal ecosystem—with regard to how criminals were connected to one another, where they operated, and what their profit incentives were. That regulatory regime gradually expanded to oblige jurisdictions to fight human trafficking alongside other crimes like drug trafficking and terrorism. For example, in 2016, UN Security Council Resolution 2331 directed the FATF to analyze "financial flows associated with human trafficking that financed terrorism."[3]

[1] "Leveraging Anti-Money Laundering Regimes to Combat Trafficking in Human Beings."
[2] "311 Special Measures." Financial Crimes Enforcement Network, 2018, https://www.fincen.gov/resources/statutes-and-regulations/311-special-measures.
[3] "Security Council Condemns Human Trafficking in Strongest Terms, Unanimously Adopting Resolution 2331 (2016)." United Nations, 2016, https://www.un.org/press/en/2016/sc12647.doc.htm

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scientist Xinyi Duan to work on the project, and Duan quickly reinforced his reservations about using a hotline as a source of the kinds of data needed. First, trafficked victims were usually traumatized, and many had only limited awareness of their situations when they called. Second, follow-up calls to seek more information were rarely possible. And finally, unsubstantiated information received from phone callers carried high legal risks related to potential defamation.

Duan suggested an alternative: to build a different kind of database—one populated with information from the frontline NGOs that best understood trafficking in their respective geographic areas, with data stored securely in the cloud. Together with Jepson, Duan submitted a sketch of the project to the US State Department's Office to Monitor and Combat Trafficking in Persons. To their surprise, given that there was not yet a proof of concept, the program awarded Liberty Asia a grant for $650,000—to begin in October 2014.

Luis C.deBaca, who at the time was the office's at-large ambassador, said, "The financial sector approach was unique and has continued to be pretty unique to Liberty Asia." He added, "No one was really capturing human-trafficking data in a holistic way—and certainly not at the point of intake," referring to the way frontline NGOs would contribute to the database. Quitting was no longer an option. The question was how to make the approach work.

The team anticipated several implementation challenges. First, it would have to enlist NGOs in data collection. In his exploratory conversations with anti-trafficking NGOs, Jepson found that frontline organizations did not collect the types of information required or even help their organizations manage caseloads. They were victim-centric, and few collected in a systematic way even basic details about victims' captors or captors' industries. They were particularly ill-equipped to think about the intersection between business and exploitation.

"Looking at the money was not something they'd ever done," Jepson recalled. Unless NGOs were willing to adopt new data management practices and develop the technical skills required to enter information into a web-enabled database system, the project would fail.

The second challenge was to break through the isolation in which individual NGOs worked and promote a spirit of collaboration. The organizations rarely talked to each other. "'You'll never bring NGOs together,'" Jepson recalled hearing a representative of a highly influential anti-trafficking organization say when he and Duan began floating their idea. From his philanthropic work, Jepson knew that nonprofits tended to compete with each other and rarely explored opportunities to "pool risk and resources." The nonprofits constituted "a network in name only," he said. Jepson also expected that because Liberty Asia had no track record and therefore little credibility, NGOs would be skeptical about sharing their information with Liberty Asia.

A third challenge involved building ties between NGOs and other major participants—especially banks but also law enforcement agencies and financial regulators. "It takes a network to defeat a network," Jepson said, quoting a phrase US Army Gen. Stanley McChrystal had coined based on his experience in fighting complex insurgencies in Iraq and Afghanistan. A related complication had to do with language and understanding: the jargon that banks used was incomprehensible to many in the NGO community and vice versa.

Alongside those delivery challenges was an additional problem: the risk that the project would run afoul of defamation laws. Jepson's eventual goal was to share intelligence with the entities—NGOs, financial institutions, or governments—that were best equipped to act, but he knew that the improper disclosure of sensitive information could lead to crippling defamation lawsuits. A victim might have known the name of the captor, but until that captor was convicted, the victim's

testimony remained only an allegation; and communication of that information could have been defamatory. Even if Jepson's organization relied on public information alone, drawing connections between players in the complex world of human trafficking could still lead to legal entanglements. Creating a functional and legally defensible network to fight human trafficking required precise determination of what kinds of information could be shared and with whom and what kinds of legal agreements were necessary. On the technological side, the team would also need to ensure any personally identifiable information they collected was stored securely, accessible only to authorized users.

Finally, gaps in law and practice might impede success. Having been a part of the banking industry as it created anticorruption and anti-money-laundering laws, as well as having participated in financial enterprise risk management governance, Jepson knew that the international legal frameworks on which his strategy relied needed strengthening. Within the realm of anti-money laundering, existing tools—such as procedures to freeze criminal assets or link financial and criminal investigations, for example—were still limited. No country had yet complied with all of the FATF's anti-money-laundering recommendations.

Nor was the legal status of human trafficking the same everywhere. The Palermo protocols required signatories to pass laws making human trafficking a statutory crime.[10] But Jepson knew that in practice, law enforcement officials across Asia interpreted the crime in various ways, because each government that had met its obligation under the anti-trafficking protocol had enacted slightly different rules. For example, if a trafficker stole a child's passport with the intent to enslave and exploit the child but the child later escaped, did that offense amount to human trafficking? Jepson thought so, but not every country's laws reflected the same interpretation.

FRAMING A RESPONSE

Jepson concluded that existing institutions—NGOs, financial institutions, and governments—were in a position to curb human trafficking across the globe. The institutions just needed to share what they knew, and such sharing required the collection and analysis of relevant data on a platform that was open to all. He initially hoped to build on the work of an existing NGO, but his team was hard-pressed to find any organization that had taken a holistic approach to the problem. And because establishing credibility among diverse actors was essential, Jepson determined that he had to build a network from the ground up. The US State Department grant was the catalyst Jepson's team needed to start their work.

Aware that no one else had tried to address trafficking through *actionable* data collection before, Jepson encouraged his team to think of Liberty Asia as a flexible "learning organization" that would try different strategies and adapt to challenges along the way. After hiring the first few employees, all of them on a full-time basis, Jepson held online meetings and daily exchanges to make sure that team members in every different country knew what others were doing. Opting for a flat organizational model, Jepson encouraged employees to be innovative and, as he put it, "disruptive." Plans for distinct but interconnected projects, including an upgrade of the hotline, began to emerge. Each of them would roll out in stages.

Building an effective network required the Liberty Asia team to enlist the active—and ideally, enthusiastic—cooperation of institutions across the spectrum of the antislavery movement. The team opted to maintain a low profile and to meet one-on-one with prospective partners in 2014. Liberty Asia's currency with NGOs was a promise to reduce the risk of reprisals by not disclosing their involvement in data sharing. The team also wanted to reassure banks that the intelligence it shared with them was confidential—not aimed at

"naming and shaming" them publicly or taking them to court.

"The anti-money-laundering regime was the first test of whether data could change behavior," said Jepson. To be effective, Jepson's team had to help bank compliance officials understand how the laws of countries in which they operated criminalized a range of predicate offenses in the area of human trafficking—that is, component crimes like theft of passports and labor exploitation. Jepson would also need to make bank officials cognizant of the risk of noncompliance. Liberty Asia's effort would yield little if banks' regulatory-compliance departments were unenthusiastic about cooperating or if they perceived human trafficking to be beyond their purview.

Concurrently, Liberty Asia planned to partner with frontline anti-trafficking NGOs that were both willing to talk and capable of doing the type of data collection the team envisioned. Because it was impossible for team members to visit every NGO in person, Liberty Asia had to focus its initial efforts. Geographically, the team decided to target Cambodia and Thailand, where it had made promising contacts with several well-networked organizations.

Plans called for NGOs to contribute information from victims to a central database, which would enable the Liberty Asia team to detect patterns such as industries and locations where the problem was worst.

The technology side was Duan's domain. Duan was responsible for building and implementing a system that could receive all kinds of information from multiple channels and eventually enable cross-cutting analysis to reveal connections and trends. Her platform, called the Victim Case Management System, or VCMS, aimed to fill in the gaps that had been limiting the usefulness of data generated by projects undertaken by such organizations as the International Organization for Migration. [See text box 2.]

Box 2. Challenges in Data Collection

Because trafficking took place in the shadows, it was difficult to count the numbers of people trafficked and to track changes in the magnitude of the problem. Beginning in 2005, the ILO periodically issued estimates of the number of victims worldwide. But the figures, based on statistical analyses of registered cases, were naturally imprecise—useful primarily for raising awareness.

It was also difficult to find current data that would facilitate a preventive, intelligence-based approach. In 2000, the International Organization for Migration established a global-human-trafficking database on victims it registered and assisted. The information the database contained, however, was heavily anonymized and for privacy reasons did not include the names of people whose experiences were so rare or uncommon that the information provided would make the people identifiable. The information also omitted the names of all victims whom other organizations served. The global-human-trafficking database, the world's largest, was helpful for understanding some kinds of trafficking patterns but not, for example, the industries in which victims had worked or the characteristics of their captors.

Polaris, a United States–based antislavery NGO, owned the second-largest dataset, which drew on information collected from victims who called its hotline. The level of detail was limited, however, and there was no way to confirm the veracity of the information.

In 2011, the UN Office on Drugs and Crime developed a database of human-trafficking case law focused on information related to prosecuted cases. The initiative provided useful data for lawyers representing trafficking victims but did not identify existing trafficking hot spots or emerging industries of concern.

Data analysis was a long-term goal—after the improvement of NGO record keeping and assisting partners with victim care. Steve Farrer, a former financial-crimes intelligence specialist who had joined the team, aimed to create typologies that depicted trafficking methods within an industry from start to finish as well as the laws that held those diverse actors—from original deceivers to third-party buyers—accountable in each jurisdiction.

The team was aware that building the database would take time. While the project was ramping up, Jepson and Farrer proposed to create another source of data from media accounts of individuals convicted of trafficking. The idea was to enlist a small group of NGOs to send reports to Liberty Asia, which would channel the information into the financial-crime risk-assessment databases to which banks subscribed. That media-monitoring project would provide Liberty Asia with the first tranche of actionable data.

Funding was a final consideration. Jepson thought the complexity and unconventional nature of Liberty Asia's work might make it challenging to finance the system he wanted to set up. He and his team deliberated over the option of taking consulting fees from the banks with which they worked. Although this revenue model would yield an income stream that could maintain Liberty Asia's operations, it would compromise the organization's independence and could potentially impede its ability to serve as a critical outside observer and independent information source. "Once you sign that [statement of] confidentiality and take the money, you are stuck with them," Jepson said. He decided to rely on grants rather than accept funding from banks or most other corporations.

GETTING DOWN TO WORK

By 2014, the team was ready to begin work on multiple initiatives at once. Establishing a functional information-sharing network was a crucial step. The two other main priorities were to build a reliable and effective data repository and to begin analyzing the information so as to reveal hidden relationships and generate reasonable cause for banks to take action.

Building a network

Team members reached out to NGOs in person and made it clear that the VCMS would be a free service with no reciprocal obligation. "We're a service provider," Jepson recalled saying. "We just give you services, and hopefully, you use them."

The team learned to identify NGOs that would be valuable, interested partners. Unsuitable partners were those that placed a singular emphasis on "helping victims in the here and now" rather than allocating some attention to systemic, preventive work, Jepson said. Similarly, NGOs that interacted with relatively few victims would be unable to produce enough trafficker profiles to make a relationship worthwhile.

After finding an NGO that was a good fit, Liberty Asia started holding meetings with the NGO's staff—almost always on-site, where the VCMS would be installed. Representatives from Jepson's team learned to use the first few gatherings for establishing personal relationships and for demonstrating their willingness to consider other points of view. Team members explained how the VCMS would work and how the system would enable them to share some types of anonymized information with banks and law enforcement agencies that had the capacity to take meaningful action. Part of the goal was to "make people aware of the greater impact the information they held could have," said Frank Nankivell, who took over management of the database system in 2015, after Duan had built the initial version.

Not surprisingly, enlisting NGOs took time as well as effort. Liberty Asia's proposal for sharing was relatively novel, and NGOs needed time to digest the idea of participating. Many NGOs also had to seek permission from their boards of directors, which were typically far removed from

actual operations—and skeptical about the idea. Some, for instance, initially questioned the security of a cloud-based system or worried that governments might manipulate the information for their own purposes. Duan said NGOs in Thailand and Cambodia tended to be receptive because they were already coordinating across borders regularly and thus quickly saw the value in the proposed approach.

By the end of 2014, the team had developed a core group of NGOs that were both eager and able to join the venture.

Enlisting financial institutions was similarly challenging. The team decided first to spread its message to large banks that showed keen interest in complying with strict anti-money-laundering regulations. Jepson knew that smaller banks, which depended on large banks for their liquidity and overseas business, would eventually follow.

Jepson visited former colleagues at leading banks. He knew from experience that most compliance officers understood the dangers of money laundering but failed to recognize the risk that human trafficking posed to their institutions. Though a corporate lawyer himself, he was a novelist and filmmaker on the side and understood the power of stories. To change the way bankers thought, he created a story that put money and financing at the center of the crime of modern-day slavery. His narrative focused on the private sector as both part of the problem and a major element in the solution. Jepson cast human trafficking as a "crime of crimes," in which victims were often deceived, deprived of their passports, imprisoned, abused, and then pressed into service without the freedom to make an informed choice. Banks had unique power to reduce the traffickers' ability to profit from such practices.

A main point was that companies and their banking partners that participated in this complex web in any way exposed themselves to the risk of embarrassing fines because they profited from

forced labor. "Will you sit around and wait until someone exposes your involvement in human trafficking?" Jepson and his team asked. "We want to help you get ahead of the curve."

Jepson's team found that banks were grateful for the way Liberty Asia clarified compliance requirements related to human trafficking and offered them tangible techniques to confront the problem. Liberty Asia had soon recruited banks that brought diverse client bases. A major player in the agricultural sector, an emerging-market bank, and various midsize but regionally important institutions were early partners.

Developing a data platform

While the early 2014 meetings were under way, Liberty Asia began working with an India-based contractor that helped NGOs build platforms using technology developed by Salesforce, a cloud computing company based in California. To enable users to store victim-derived information securely in the cloud, Liberty Asia customized and managed the software, with Duan taking the lead on back-end coding while NGOs chose from tools and options displayed on the simple user-facing platform to suit their unique and specific needs. Prue Allen, who later headed the VCMS project, said a key benefit was that "you can bend [the system] to your will without extensive technical training."

The team decided to start with a goal of simply getting NGOs active in data collection and rudimentary analysis that would help advance their own missions. For that reason, Duan and Jepson decided it would be best to present the technology to NGOs as a way of managing cases in a centralized location. Still, the database came together only slowly. "You must get these people who are dedicating themselves—24 hours a day and tirelessly—to sit down an extra half hour a day—not helping people but doing the administration," Jepson said. "That was the first

test." There was a lot of pressure for immediate data from those who heard about the initiative, he said, but "it was really about getting a community knowledgeable about why it's important to collect [data] in the first place."

In the early days of Liberty Asia's series of field visits, software company Salesforce sent trainers to assist the team and its NGO partners at no cost, through Salesforce.org, a nonprofit social enterprise aimed at helping other NGOs take advantage of technology to boost impact. Salesforce gave Jepson the first 10 licenses free, later providing licenses for Liberty Asia at a discounted rate. It also provided follow-on support.

By the end of 2014, the system was ready. The first adopter was Chab Dai, a Cambodian NGO that had nearly a dozen affiliated groups. Duan found that the members of that network collected different types of data and used a variety of intake forms. She reviewed the forms and adapted the VCMS to the NGOs' collective needs, standardizing when she could. After sifting through options available on the platform, organizations began to see that some of the data they had never thought to collect could be useful to their work—some of it less so.

To increase engagement, Jepson's team also began to emphasize certain side benefits of participation. Duan and others noticed, for instance, that victim care workers in their 20s and 30s were especially quick to take up the new technology because they wanted to develop technical skills that would help them outside the NGO world in the future. So Jepson's team, in its pitch, began to emphasize familiarity with Salesforce technology as a marketable skill.

The team soon received queries from prospective users outside Chab Dai's network. Ekaterina Sivolobova, founder of Project 189—a Kuwait-based NGO established to protect migrant workers—adopted the VCMS to collect data on victims' nationalities and modes of exploitation, which would eventually help her team analyze policy gaps and create advocacy documents. Sivolobova said she enjoyed being tied into a global effort but also appreciated that the new system served a very practical case management role—and proved more efficient than typing victims' stories into Microsoft Word documents, as the NGO had done since its inception.

Still, most of the contributed data lacked the detail required for use by law enforcement agencies. Partly because they were using the system for their own record keeping, NGO workers were sometimes vague in their reporting—for example, indicating a location by writing the words *behind the yellow door*, which would have been unhelpful to law enforcement had the words been shared.

That shortcoming did not worry Jepson. "Investigation work, while satisfying, is not a solution," he said. "You need to put [traffickers] away, but it will never be comprehensive and so will not stop human trafficking." He could point to existing conviction data to support his case: from 2007 to 2010, the total number of convictions for trafficking in persons was "between 5,500 and 7,000 per year for the 132 countries covered," according to the UN Office on Drugs and Crime.[11] The number of people trafficked was rising, but convictions were failing to keep pace.

Data analysis remained secondary to NGO take-up during the early days of the VCMS. Nankivell said the team "didn't know what we would be able to collect until we started collecting it." He found that some NGOs used the system for so-called pre-trafficking work with vulnerable families rather than exclusively for managing victim caseloads. The team was pleased to witness such unexpected uses of the system. Still, Nankivell worked closely with Farrer, who headed the typology project, to determine whether it would be possible to use the VCMS to collect certain information NGOs did not typically ask for—such as traffickers' license plate numbers, types of products made from forced labor, or even names of banks where perpetrators held accounts.

Those sorts of information would eventually help Farrer trace trafficking operations or identify an industry worth examining.

The VCMS team was similarly glad to find that NGOs occasionally wanted to share files with one another through the platform in order to facilitate the care of victims who had crossed borders. Though Liberty Asia's VCMS manager—with consent from the Liberty Asia—was the only one who could see an NGO's data outside the organization itself, the team decided to facilitate victim case sharing between NGOs through the VCMS platform if requests came from both partners. Fostering collaboration between NGOs proved easier than Jepson had foreseen. Indeed, collaborations were occurring as naturally as he had hoped.

Getting to actionable data

As expected, VCMS data was not actionable at first. But when Farrer came aboard as director of the so-called actionable research program in mid 2015, he advanced projects that had been set in motion by Jepson, Duan, and a third team member, Archana Kotecha, to produce intelligence that could help banks and corporations do something about human trafficking by way of the anti-money-laundering regime.

Farrer had volunteered with Liberty Asia for a year before leaving his job in regulatory compliance at Standard Chartered Bank to join Jepson's team full-time. He had helped the team design its efforts to leverage the anti-money-laundering framework, and he became increasingly confident the approach would work. He had also played an important role in facilitating Liberty Asia's connection to Thomson Reuters World-Check, having worked there for several years.

Farrer quickly built on the groundwork already in place, but he began to shift the emphasis and add new dimensions. At the start, Jepson's team had anticipated that frontline NGOs would

play direct roles in collecting data for banks. But Farrer recognized that "crafting something from open-source intelligence that would meet the needs of a bank required a different model." His idea was to enlist the help of a small group of frontline NGOs—many of which already were doing investigative work or regularly monitoring the news—in the collection of published open-source information, such as newspaper reports that detailed the convictions of traffickers. Those NGOs would upload what they found to a central system Duan had built in 2014 that could integrate with database service World-Check's financial crime risk database.

Aiming to avoid duplication of profiles, Farrer recruited no more than one NGO per region per dialect. Duan and another team member, Marc Lucas, worked with developers to improve the platform, making front-end collection as simple as possible. NGOs could log in to the system from their mobile devices by using an access code; they could then enter four or five data points and transmit the report. Thomson Reuters began uploading the information on convictions into its database once a month—after reviewing the reports for accuracy and source credibility.

This innovation would improve the data World-Check had at its disposal. World-Check was missing a lot of information on human trafficking not only because it was a relatively new focus area for its clients but also because its search tools simply could not penetrate the entire internet. A Google search, for example, was "broad and shallow," Jepson said. It scooped up only limited information. Other available search tools were "narrow and deep."

With Thomson Reuters World-Check onboard, Liberty Asia began seeking additional outlets for the profiles, ranging from money service businesses like Western Union and MoneyGram to other database services like LexisNexis Acuity. These providers more readily

agreed to accept the data because the team had won credibility through the Thomson Reuters deal.

Creating typologies

Banks focused on two types of risk. They needed information to reduce their *client counterparty risk* (i.e., risk of onboarding a client that gained money from a criminal activity such as money laundering) and, separately, they had to do due diligence to assess *investment risk* (i.e., whether an investment hid a material risk arising from trafficking or other forms of forced labor).

For those purposes, Liberty Asia wanted to name names when possible; but even when it could not do so—because a trafficker had, say, evaded conviction—it could still make a difference. Liberty Asia had to provide only enough information to raise concerns about risk exposure, and the banks could then complete the puzzle.

If banks or investors perceived *any* significant risk in a given geographic area or industry, Jepson figured, they would forgo the potential new client or investment. He recalled that his team would say, "The NGO has been there for the past 10 years, and they're telling you there's a problem," knowing that mere suspicion was enough to trigger a bank investigation. Over the longer term, Liberty Asia hoped financial institutions would develop their expertise in countering human trafficking by applying the same logic and anti-money-laundering tools they used against narcotics smugglers and terrorists.

Farrer reasoned that it was possible to create what the banking industry called a *typology*, which depicted graphically the types of businesses and individuals gained from the crimes and showed victims' paths from recruitment to forced labor. The goal was to illustrate both what happened to victims and how the products of their labor ended up in the global supply chain, Farrer said.

The typologies would make a bank's risk clear to a compliance officer, whose first move would be to check whether any of the bank's clients

appeared in the typology and whether the bank had any major clients in the industry of concern.

Jepson also thought he could reduce defamation risk this way. "The problem with defamation is that you name a single person," he said. "Now, I can just say, 'Here's the situation, and these are some of the gaps. Fill in the gaps yourself,'" which would be comparable to giving someone details about, say, a restaurant—except for the restaurant's name—and leaving the person to fill in the blanks by using their own search. (See Figure 1.)

Farrer's team experimented with different ways to construct the typologies, refining its method along the way. Early on, the team decided to research the palm oil industry after NGOs familiar with the Southeast Asia–based industry reported widespread exploitation. But as hard as he tried, Farrer could not find the information he needed to trace the supply chain. Eventually, he became able to source the data he needed from the VCMS and media-monitoring projects, but at the time, he could get only anecdotal evidence, which was insufficient for his purposes.

Farrer and Jepson soon discovered another way to help identify traffickers and trace the supply chain. Jacob Shapiro, a professor of politics at Princeton University, was working on a software program that could detect signals of a range of behaviors in online information such as ads and discussion boards. Shapiro was looking for a way to use the new technology to help counter labor trafficking, and he reached out to Jepson.

Shapiro's project was one of several that had taken aim at human trafficking. In January 2014, the Defense Advanced Research Projects Agency, or DARPA, started a program called Memex to develop new technologies that could search for traffickers in parts of the internet that were otherwise accessible only by means of special software or with authorization or were otherwise anonymized. The web crawlers in most search engines did a poor job of cataloging that part of the internet, and criminals, including traffickers,

Figure 1. Example of a Typology
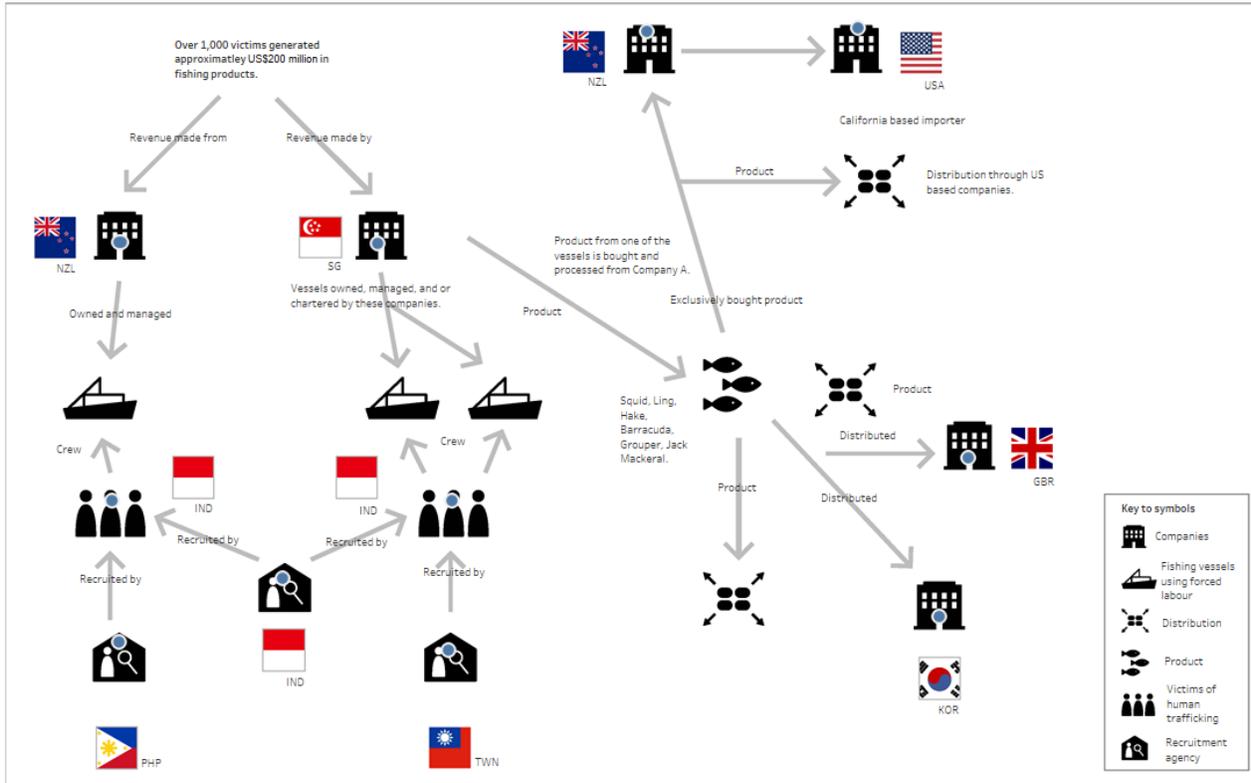
often used those spaces, such as the dark web and various ad platforms to conduct their business. DARPA-funded researchers working on Memex had built several software tools to improve content discovery and information retrieval.[12] What they did not yet have were, first, a good way to identify traffickers' profiles or footprints and second, an organization willing to try out the approach.

Shapiro had been working on Memex since it had been a pilot project, or seedling—in DARPA terminology. Inspired by Memex, Shapiro's company, Giant Oak, created a product called Giant Oak Search Technology (GOST), which could help focus internet searches to detect specific behaviors. "The software program builds a customized internet domain for you and prioritizes results for investigations," Shapiro said. "So with Liberty Asia, we built a human-trafficking domain that prioritized information relevant to human trafficking. That meant indexing parts of the web

and other sources that were not being prioritized well by Google or Bing and then sorting the information so that we pushed to the top of the search order the articles and sites that were likely to be relevant to identifying human trafficking." The goal was to make Liberty Asia's web searches much more effective.

Liberty Asia found it could use information from its media-monitoring project and the VCMS to help fuel GOST's searches.

Farrer's team soon became able to complete a typology in three months. After identifying a transnational trafficking ecosystem involving international payments and at least 500 victims, the team would look for open-source clues as to who benefited from the activity, searching mainly for existing conviction data. As GOST came online, it could supplement that information further.

Although banks that viewed the typologies could easily perceive their potential liability under anti-money-laundering statutes, Liberty Asia

wanted to ensure that other companies in the supply chain could understand what the typologies said about their risk, too. For that reason, the team this reason, the team began to incorporate a brief summary of the laws that made benefit from human trafficking illegal in the jurisdictions a typology covered.

Under anti-money-laundering laws, banks and banking regulators operated largely within a framework of confidentiality, thereby mitigating the risk of legal action against Liberty Asia. Outside that group, in the absence of such a framework, the team would share only completely anonymized versions of the typology. "When we share information with entities that don't have the safe-harbor protection of the anti-money-laundering framework, we have to be much more careful," Farrer said. "In this type of information business, you deal with people you trust."

Looking beyond the financial sector

Because of the global systems in place to curb money laundering and terrorism financing, it was possible to bring banks on board and gradually dry up licit sources of financing for businesses that employed forced labor. But reducing the demand itself for the commodities those businesses produced was another way to deal a blow to traffickers, and the way to do so was to target the big companies that purchased their products. Liberty Asia could help large supermarket chains, for example, reduce their exposure to human trafficking in their supply chains by flagging suspect sources, and profits from trafficking would fall.

The question was how to safely channel data to those companies and induce them to act. Experience had taught Jepson's team that it was easy for a company's due diligence department to dismiss an NGO that approached it directly to offer information. Demonstrating credibility was essential, and in that respect, the confidence that law enforcement agencies showed mattered. Liberty Asia's reputation received a boost when

Interpol disseminated a four-page notice on human trafficking in the Southeast Asian fisheries sector by using Liberty Asia's findings along with other sources.

However, what was still missing was a tool like World-Check for the fishing industry. Unlike World-Check, though, the database would have to be free and provided in conjunction with respected partners in the fishing industry; otherwise, companies would not use it. After some searching, the team found that Monterey Bay Aquarium's Seafood Watch program and the Sustainable Fisheries Partnership (SFP) were trying to develop a similar system. Together the two in February 2018 launched www.seafoodslaveryrisk.org, a free tool that provided risk ratings for various fisheries around the world. Liberty Asia was able to offer to experts from Monterey Bay and SFP the use of information from all of its various programs on human trafficking.

Expanding the collaboration, building knowledge

Concurrently with the rollout of those projects, Liberty Asia also began to create an online platform for anti-trafficking NGOs, known as Freedom Collaborative, which was the first forum of its kind to connect the global anti-trafficking network and facilitate cross-border cooperation. In February 2015, Jepson hired Julia Macher, who had been involved in international development before, to spearhead the effort. Macher started by traveling from country to country for in-person meetings with NGOs.

The Freedom Collaborative forum officially launched a year later, in February 2016, with the aim of providing a place where NGOs could share ideas (but not intelligence, which was reserved for the VCMS) and, later, learn about often unfamiliar concepts like money laundering. The forum also helped link groups working on the same case or similar issues. Its private messaging function ensured that correspondence between NGOs was not directed to outdated e-mail addresses—a common problem Macher had identified during

her field visits. And the platform carried articles on subjects of mutual interest, many written by the participants themselves. As time went on, it also hosted webinars.

The fact that users had to register gave Freedom Collaborative a community feel. Early users were primarily victim service providers in Asia, but individuals and groups from around the world involved in the many facets of human trafficking began to join—including, notably, some from the private sector.

Freedom Collaborative's initial utility quickly became clear. For example, in one instance, an organization beginning work in South Africa soon learned that Thai women were being trafficked to South Africa. The organization searched for Thailand-based NGOs on Freedom Collaborative and located partners from which it gained a better understanding of the Thailand-to-South-Africa trafficking operation and even identified a Thai social worker to work with Thai victims through the South Africa office.

Closing gaps in the law

Liberty Asia's legal team also learned and adapted its work as the organization's activities changed. In addition to handling the organization's own legal work, the team offered legal training and resources to interested NGOs; helped banks, regulators, and industry leaders understand how the law held them accountable; and pushed for more fundamental reform when necessary.

Archana Kotecha, a UK-qualified barrister with seven years' experience in corporate law, who joined the team in 2013, saw that lawyers "didn't always recognize [human trafficking] when it came across their desks" or didn't know what steps to take, and she figured the same might be true of public officials. She decided to find ways to promote better victim identification among frontline service providers by experimenting with ways to address the challenge in a place she knew well, Hong Kong, and soon developed a Hong Kong–focused Victim Identification Toolkit. Then

she went to universities' public health departments to teach students how to refer cases. And she developed a corresponding training program for young lawyers.

Kotecha next set out to learn more about how to adapt the anti-money-laundering legal framework so it would serve to constrain human trafficking. She approached law firms for pro bono advice. "I needed them to look at the anti-money-laundering framework, to analyze it in the context of my knowledge of trafficking, and to give me answers," she said. "The idea was that, well, if there are guys getting paid to actually already do this work and who are already looking at these laws day in and day out as they advised people, then we could learn from their perspective, apply it to our world, and use it." Kotecha eventually convinced more than a dozen law firms to help with financial law research—everything from how banks reported suspicious activities to how human trafficking was financing terrorism.

Once the research was under way, Kotecha's work quickly expanded beyond supporting NGO casework and training lawyers. Kotecha applied her newfound expertise to building awareness among banks and financial institutions as well as regulators.

She worked through law firms to identify gaps in Hong Kong's legal framework—especially its anti-money-laundering, antitrust, and anticorruption laws—that might allow traffickers to conduct their business with impunity. When she published the report, not everyone in the Hong Kong government approved, but law enforcement officials and the judiciary were more receptive. Jepson said, "The report made things clearer for them in their day-to-day work." Judges began to carry the document into human-trafficking cases over which they presided. And Hong Kong's security bureau invited Liberty Asia to make a presentation.

The team wanted to build on what it had learned in Hong Kong. Kotecha next completed gap analyses for Cambodia, Thailand, Malaysia,

Vietnam, Singapore, and China but tried to consult with government officials, NGOs, UN agencies, and law firms to build consensus on a draft in those instances before publicly releasing recommendations. The gap analyses were used in different ways by different stakeholders: some used them to inform rescue efforts in neighboring jurisdictions, and others used them to support advocacy and policy arguments.

Kotecha also began to focus much of her energy on compliance events that brought together the clients of some of the law firms that had assisted Liberty Asia's work. Those clients represented not only banks and financial institutions but also a host of industries—all of which were likely exposed to slavery in one form or another.

Because trafficking was often a cross-border problem, Kotecha stressed the importance of a unified regional approach, and tried to find ways to bring regional stakeholders together. She and Jepson had an idea for a Legal Impact Hub, launched in mid 2017 and focusing first on Hong Kong, Cambodian, and Thai stakeholders. The idea was to bring together collaborators who, they said, were "not natural bedfellows" to resolve major challenges like cross-border litigation and the gathering of evidence that could be used in court. Kotecha first met with groups one-on-one to learn how each group provided victim services, how each secured legal advice, and what gaps existed. She wanted to create a self-sufficient "community platform, as opposed to something Liberty Asia owned and operated," she said. She was merely a facilitator.

The conversations led to capacity-building projects. In Thailand, for example, NGOs wanted to improve their ability to gather evidence, so Kotecha asked companies in the network to train frontline staff so they could learn what steps to take. She also helped educate interested local law firms about how to identify client risks that might arise from trafficking.

OVERCOMING OBSTACLES

Finding a way to create the typologies was only part of the challenge, because Jepson and Farrer needed a way to ensure that recipients indeed *acted* on the intelligence they gained access to. Giving the same data to regulators as they did to banks, they soon realized, would pressure banks to pay attention. In particular, Jepson wanted to partner with the powerful organization that regulated the world's trade in the US dollar: the Financial Crimes Enforcement Network, known as FinCEN, part of the US Department of the Treasury.

In dealing with financial intelligence units, however, there was a problem. Whereas some units were law-enforcement based, most were administrative. Liberty Asia could transmit information to the former, which could follow up with further investigation, but it could not transmit to the latter. Jepson and Farrer could not share information directly with administrative bodies without a change to the organization's powers or an exemption from a country's defamation laws.

Jepson thought there was a way to circumvent that problem and reduce risk. After months of back-and-forth, the US Human Smuggling and Trafficking Center, an organization established by the Intelligence Reform and Terrorism Prevention Act of 2004, agreed to accept all of Liberty Asia's information and send it directly to FinCEN. That official bridge between Liberty Asia and FinCEN effectively ensured the latter would use the information to apply pressure to banks. FinCEN could use its Global Liaison Division and its membership in the Egmont Group, a multilateral alliance of about 150 financial intelligence units, to build cooperation and give the NGO's data global reach.

The team's opportunities to influence national financial-crime enforcement units continued to grow. The FATF invited Liberty Asia to Moscow in April 2017 to address its Joint Experts Meeting on Money Laundering and Terrorist Financing

Typologies, attended by representatives from financial intelligence units worldwide. Then, in November, the Asia/Pacific Group on Money Laundering, a FATF-style regional group, invited Liberty Asia to organize a public–private sector forum for other NGOs and certain private sector companies in Busan, South Korea.

Farrer said Liberty Asia's preference for collaboration and engagement over naming and shaming or prosecution strategies was key to the organization's success at forum events. The team emphasized helping concerned institutions better understand how they could improve. Regulators from several countries, by realizing the value of Liberty Asia's information, began to seek procedural or even regulatory changes that would address some of the obstacles that had earlier blocked the NGO's ability to transfer information directly to financial intelligence units.

ASSESSING RESULTS

Liberty Asia was distinctive for its focus on (1) perceiving human trafficking as a business and (2) targeting the money trail. Within five years, the Liberty Asia team had achieved success in disrupting the environment in which slavery persists. There was much still to do, but its approach had made inroads.

Some of the signs of success were apparent in the staffing patterns of companies and banks in areas where the NGO and its partner organizations were located. "Some people have actually been appointed now to think about [human trafficking]. We were part of starting that," Jepson said.

The VCMS attracted 20 NGOs in its first year. By December 2017, there were more than 45, with another 10 in the pipeline. The more than 200 NGO staff members who used the system added 23,000 entries during the same period, making VCMS the third-largest human-trafficking dataset available—after those maintained by the International Organization for Migration and anti-trafficking organization Polaris. Users were primarily in Asia, although two were in Africa and another was in the Middle East.

More important than the quantity of entries to the database was the quality. Reflecting on his visit to a VCMS user in 2017, C.deBaca said, "I was very impressed with the granularity of what the NGO could capture: people who had been involved in crimes, what victims knew about the employers or the plantation owners, the specific region or language, what sector they ended up in, or what product they were making. The level of information was pretty stunning." He added, "That's why I think the VCMS will be much more predictive going forward."

The media-monitoring team began with just 13 trafficker profiles in 2014 from the fishing industry; it surpassed 9,000 in 2017. Through risk assessment databases such as World-Check and by means of relationships with financial intelligence units, Liberty Asia's information on traffickers began to reach a vast and powerful network.

With the support of FinCEN, trafficking typologies and other information put pressure on banks and reached other financial intelligence units, but the goal was to channel that data to an even wider group.

As of December 2017, Freedom Collaborative had grown to more than 2,600 people and more than 550 organizations in 58 countries. The new goal was to expand its reach from Asia to other regions—including Europe, where the trafficking and the refugee crisis intertwined.

Liberty Asia's legal team used its creativity to address continuous challenges. The *Financial Times* selected Kotecha as one of the 10 most innovative lawyers in the Asia Pacific in 2017. She was the only NGO awardee.

Jepson continued to experiment. He revived the hotline project he had initially created, but he expanded and improved it so that it could serve victims and victim care NGOs more effectively while also providing a source of data. With his technical team, Jepson set up a private branch

exchange (PBX) telephone system that among other things, enabled call forwarding. It meant that if a responder was away when a victim called, someone else would be available to receive the call. The upgraded PBX also enabled users to make transnational calls so that NGOs in different countries could discuss shared cases and add more-complete information to their databases. Because the approach was new, some important unknowns remained. When banks dropped suspicious clients in order to comply with anti-money-laundering policies, a practice known as *de-risking*, there were potential costs for poor communities, even as the practice reduced the financial incentives for trafficking. The international development community raised alarms about the potential adverse impact on people in poor countries—primarily "the families of migrant workers; small businesses that need to access working capital or trade finance; and recipients of lifesaving aid in active conflict, postconflict, or postdisaster situations," according to the Center for Global Development.[13] The vulnerable people in those poor countries overwhelmingly relied on correspondent banking and money-transfer operators, which were costly for banks to monitor under stricter compliance regulations. In some areas with high human trafficking risk, access to financial services might shrink.

REFLECTIONS

Liberty Asia addressed the crime of human trafficking by focusing on underlying causes rather than tragic consequences and by adapting methodologies used with some success elsewhere to address a different policy challenge. The NGO's initiatives opened the door to new ways of thinking for both NGOs and government agencies—not only the Victim Case Management System platform but also Steve Farrer's actionable research program for banks; Archana Kotecha's

legal services that examined corporate accountability and anti-money-laundering laws and that helped organizations seek justice for the victims they assisted; and Freedom Collaborative, which connected organizations worldwide doing similar work and provided training and knowledge sharing.

This strategy had potential applications in other fields, too, such as environmental protection and wildlife trafficking. Kotecha, the lawyer who joined Liberty Asia in 2013, described the shift in thinking: "I never thought what I'd learned in the corporate world would ever be applied to human trafficking." Along with Duncan Jepson, the banking attorney who founded Liberty Asia, Kotecha began to consider the crime a business, open to some of the same accountability systems applied to firms engaged in other kinds of activities. "When you look at it as an illicit *business*, you suddenly have all these other tools that we use to ensure good governance and fair play: the anticorruption regime, the anti-money-laundering regime, antitrust laws, etcetera," she said. "You open up this whole world of possibilities that might not have been there if you'd focused just on the issue of human rights."

The broad approach ensured "victims' voices went into the analysis," said Luis C.deBaca, former at-large ambassador for the US State Department's Office to Monitor and Combat Trafficking in Persons. "Liberty Asia understood that the victims, the workers, and the people in prostitution who are at the heart of this crime don't live their lives based on distinctions between legal issues and financial issues and development issues, as opposed to gender issues. Those silos are grafted on by society, by people's professions, by UN agencies, et cetera. Once you look at the world the way Jepson does, it makes sense that you would have a legal hub, a financial crimes arm, a media-monitoring project, and a victim case management database. All of those things are necessary if you're

going to have an ecosystem that revolves around the lives of victims, as opposed to aligning with the silos of the preexisting institutions."

Innovation required constant learning and adaptation. There were many unknowns—and many opportunities to fail. Jepson said his response entailed "trying to do as many things in as many different areas as possible and to keep thinking about them in order to learn." The idea was to proceed through trial and error—but always surrounded by very talented people. At every step, Jepson and his team deliberated together before acting.

Although his approach relied in part on technology and in part on a complex global regulatory system, Jepson said he also prioritized "the human factor." He knew he would encounter skepticism at all levels—from busy NGO leaders to bank officers. But he found that in-person conversations were the most effective way to explain his complicated idea and gain buy-in. He also found that awareness spread most effectively through simple word of mouth. That patient approach kept Liberty Asia out of the spotlight but made it possible to build a capable, coordinated network.

The organization also learned lessons about the need to reduce transaction costs and achieve economies of scale. As Liberty Asia gained credibility, it could engage industry associations—instead of individual companies—by using the associations' networks to reach many firms at once. Former bank regulatory compliance officer Farrer, who developed typologies showing the relationships between the various actors involved in human trafficking, said he envisioned moving into the construction and electronics industries next.

Liberty Asia was not the only private organization seeking to apply the anti-money-laundering regime to the human-trafficking problem, but it was among the first—and its actionable data-collecting, bank-and-regulator-compelling strategy was unique. Nick Grono, inaugural CEO of the Freedom Fund, a private donor fund to end slavery, said policy think tanks like the Royal United Services Institute were also becoming more and more attuned to how the financial sector affected trafficking. The US Bankers Alliance and the European Bankers Alliance assembled key stakeholders around the anti-trafficking cause and disseminated practical resources and toolkits. Stop The Traffik, a United Kingdom–based NGO founded in 2006 to commemorate Britain's abolition of slavery two centuries earlier, also began to map supply chain risk and build awareness through tools like mobile apps that "enable people to recognize signs in their community and to share what they see."[14] Liberty Asia partnered with the NGO in some of its activities.

Kotecha said she had witnessed a "sea change" in attitudes toward Liberty Asia's work through the years. Initially, she said, people looked "bemused" when she spoke of Liberty Asia's systemic approach of applying the anti-money-laundering regime to human trafficking. "We've shown people an entirely different way of combatting trafficking," she said. "We've brought people like bankers into our world to look at what's happening on the front lines, so that when they're making decisions . . . far away in an ivory tower, they can be mindful of the impact their decisions are having."

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