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Casinos, cyber fraud and trafficking in persons for forced criminality in Southeast Asia

Policy Brief – Summary Overview

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This publication was produced by the UNODC Regional Office for Southeast Asia and the Pacific (ROSEAP) under the supervision of Dr Rebecca Miller, UNODC Regional Coordinator – Human Trafficking and Migrant Smuggling.

Lead author: Dr Deanna Davy, Senior Consultant (UNODC ROSEAP).

Editorial and production team: Dr Sylwia Gawronska, UNODC ROSEAP Technical Programme Advisor, Human Trafficking and Migrant Smuggling.

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Abbreviations

AI	Artificial Intelligence
COVID-19	Coronavirus disease 2019; SARS-CoV-2
FATF	Financial Action Task Force
HR	Human Resources
IT	Information technology
MoU	Memorandum of Understanding
NGO	Non-government organization
NRM	National referral mechanism
PDR	People's Democratic Republic
SEZ	Special Economic Zone
SOP	Standard Operating Procedure
TRM	Transnational referral mechanism
UAE	United Arab Emirates
UN	United Nations
UNODC	United Nations Office on Drugs and Crime
US	United States
USD	United States Dollar

Key messages from this Summary Policy Brief:

- The online scams and fraud as well as trafficking in persons offences that are occurring in Southeast Asia are a perfect demonstration of transnational organized crime. Organized crime groups have established extensive criminal operations in Cambodia, Lao PDR, Myanmar, and other countries. They have taken advantage of the existing casino and Special Economic Zone (SEZ) infrastructure and unemployment present in the region to set up sophisticated operations that use trafficked people to conduct online scams and fraud.
- Transnational organized crime is flourishing. Trafficking for forced criminality in Southeast Asia is intertwined with high levels of money laundering and various forms of cyber enabled crimes. Importantly, trafficking for forced criminality would not have reached the scale and the level of operational sophistication if not for the corruption and complicity of some public officials who enabled, profit, or stay passive in addressing the illegal activities of organized crime groups. Additionally, alliances formed by organized crime groups with political and private sector elites allow to legitimize and expand their illegal operations.
- The modus operandi of criminal operations is similar across countries. Organized crime groups have developed and implemented a sophisticated plan to defraud people around the world, which utilizes trafficked victims to perform various criminal acts. This multi-billion illicit business continues to expand, utilizing the latest artificial intelligence (AI) tools, including face swapping and voice replication to bypass banking security systems.
- The issue is a global problem. Victims are being recruited from regions of the world, including Asia (Southeast Asia, East Asia, Central Asia), Africa, South America, and the Middle East, amongst others, and the victims being scammed are also from different parts of the world, including Asia, Europe, North America, and Oceania.
- The people rescued from the scam compounds are, for the most part, victims of trafficking for forced criminality and should be treated as such. Victims of trafficking should be able to access protection and assistance, reintegration support, and justice, which in the current context, is largely being denied to victims.
- Despite recent State and civil society efforts to respond to the problem, trafficking for forced criminality is not abating. Scam compounds continue to expand in size and operation. Countries' efforts to combat this form of trafficking are having limited or even no impact because efforts are being conducted unilaterally with little coordination.

Overview

From early 2021, an increasing number of stories started to emerge of trafficking victims escaping from scam compounds in Cambodia, Lao People's Democratic Republic (PDR) and Myanmar, as well as the Philippines, Malaysia, Viet Nam and other countries. Concerns regarding citizens being trafficked and severely mistreated, primarily in scam compounds in the Golden Triangle, were also expressed to the United Nations Office on Drugs and Crime (UNODC), and other United Nations (UN) agencies by several governments in the region. The trafficking victims all told similar stories of being deceptively recruited into situations of forced criminality (see explanation below) in casino complexes or highly guarded buildings in Southeast Asia. After travelling to or within the destination country, they were confined to large casino or hotel complexes, or other secure buildings tailored to harbor/confine victims ('scam compounds') where they were forced, for up to 15 hours a day, to conduct online scams and fraud. These online scams and fraud, committed primarily by trafficked persons under duress, have defrauded thousands of scam victims around the world of, on average, USD169,000 per victim.¹

Trafficking for forced criminality (or for exploitation in criminal activities) can be understood as trafficking in persons for the purpose of exploitation of victims through forcing or otherwise compelling them to commit criminal acts for economic or other gains of traffickers or exploiters.

While there is no accurate data on the number of victims trafficked for forced criminality, international organizations and non-government organizations (NGOs) estimate that 10,000 to over 100,000 predominantly young men and women have been trafficked to Southeast Asia and forced to commit online scams and fraud. At the time of writing this Brief, thousands of victims have escaped, been rescued, and returned to their home country; however, overall, the problem is not abating, with new scam compounds being built and existing scam compounds expanding in size and geographical scope.

This emerging form of trafficking has been creating a significant classification challenge for States, criminal justice practitioners, and counter trafficking stakeholders. In many instances, this form of trafficking has been considered as trafficking for forced labor, or an issue of labor law (employment contract) violations. While there is a distinct element of victims being forced to work extended hours, with little or no pay, the intent and the end goal of traffickers is to force trafficked victims to commit scams resulting in financial fraud (criminal activities). While not included in the Protocol to Prevent, Suppress and Punish Trafficking in Persons (the Trafficking in Persons Protocol) explicitly, exploitation in criminal activities has been incorporated into domestic trafficking legislation by many countries around the world. In Southeast Asia region, only Malaysia has incorporated this form of exploitation into their domestic legislation.

One distinctive feature of this relatively new form of trafficking in Southeast Asia is its intimate connection to the operation of transnational organized criminal groups. Trafficking for forced criminality would not occur at the level that it does if not for extraordinary profits made by criminals. The same illicit profit is, in turn, used to buy legitimacy for businesses established by criminal groups as well as protection from scrutiny and interference from complicit public officials. Illicit profits are also invested to improve and expand operations of criminal networks and profitability by misusing existing and emerging digital and artificial intelligence (AI) technologies. The cost of this growing transnational organized crime should be measured beyond illicit profits. The overall cost should include exploitation of the thousands of victims trafficked from vulnerable communities as well as the financial distress caused to victims of financial fraud. This results in deteriorating rule of law, which in turn, negatively impacts the stability and financial security of the region.

As the guardian of the UN Convention against Transnational Organized Crime (UNTOC) and its supplementary Trafficking in Persons Protocol, UNODC has a vital role to play in assisting States to prevent and combat organized crime, including trafficking in persons. As part of its broader efforts to combat organized crime, UNODC conducts research on contemporary organized crime trends. At the time of publishing, there was only a very limited

¹ PROPUBLICA, 2022, Human Trafficking's Newest Abuse: Forcing Victims into Cyberscamming: <https://www.propublica.org/article/human-traffickers-force-victims-into-cyberscamming>

body of literature on the subject of trafficking for forced criminality in the public domain. In response, between March and June 2023 UNODC ROSEAP examined the emerging criminality and trafficking trend in Southeast Asia. This undertaking involved a review of the literature and 18 semi-structured interviews with representatives of government agencies, international organizations, NGOs, and the private sector in Southeast Asia and other regions of the world.

The objective of this undertaking was to explore and document current trends in the modus operandi of organized crime groups in Southeast Asia, including victim recruitment tactics and control methods; locations of the scam compounds; profits from the online scams and fraud; the profiles of offenders; the profiles of victims; and States' responses to trafficking for forced criminality, including gaps and challenges in these responses.

This Summary Policy Brief, which precludes a more in-depth Policy Brief, presents the key findings (section I) and recommendations (Section II) so that States, international organizations, NGOs, and the private sector can develop evidence-based and coordinated responses to combating trafficking for forced criminality.

Key findings

1. Organized crime in Southeast Asia is flourishing

Southeast Asia is currently facing significant and systemic transnational organized crime challenges. Transnational organized crime can broadly be understood as profit-motivated serious criminal activities with international implications, conducted by more than three persons who work together.² Organized crime groups in Southeast Asia do not necessarily operate in the shadows. In addition to being members of organized crime groups, offenders may also own legitimate businesses and have formed allegiances with influential figures in government and the private sector with the intent of expanding their wealth and power.

There are several important reasons why transnational organized crime groups have rapidly increased the operation of online scams and fraud

as well as trafficking for forced criminality. Due to the COVID-19 pandemic restrictions, millions of gamblers and tourists from Southeast Asia were no longer able to visit casinos in the SEZs of the Mekong region. As a result, organized crime groups' need for new sources of revenue streams significantly intensified. At the same time, large numbers of foreign workers left existing legal and illegal gambling establishments and returned to their home countries. This created a major labor gap which organized crime groups needed to rapidly address. Moreover, during the pandemic, the popularity of digital payments, e-commerce apps, and cryptocurrencies increased, with people spending more time online. Concurrently, the COVID-19 pandemic significantly deepened the economic vulnerability of millions of people across Southeast Asia who became desperate for work.

In response, organized crime groups identified that they could address the need for new revenue by conducting online scams and fraud, targeting people in Asia, North America, Europe, and other regions of the world. Organized crime groups also identified that they could address their new labor needs by trafficking young, economically vulnerable, educated, and multilingual persons from Asia and other regions into casinos and compound-type establishments where they could be confined and forced to conduct online scams and fraud. Simultaneously, organized crime groups took advantage of alliances with senior government officials as well as the conflict in Myanmar to expand their massive scam and fraud operations.

2. The modus operandi of trafficking for forced criminality is consistent across the region

The modus operandi of the organized crime groups conducting large scale online scams and fraud is consistent across countries in the Mekong region. Organized crime groups first recruit trafficked persons with the intent to force them to assist in the commission of financial fraud in cyberspace, including romance and other scams, investment in fake online brokerages and cryptocurrency platforms, and illegal gambling. Organized crime groups primarily target university graduates that are fluent in multiple languages (especially English and Mandarin), have skills in Information Technology (IT), familiarity with social media, and some working

² United Nations Convention against Transnational Organized Crime.

Figure 1: Locations of casinos and scam centres in Cambodia, Lao PDR, and Myanmar

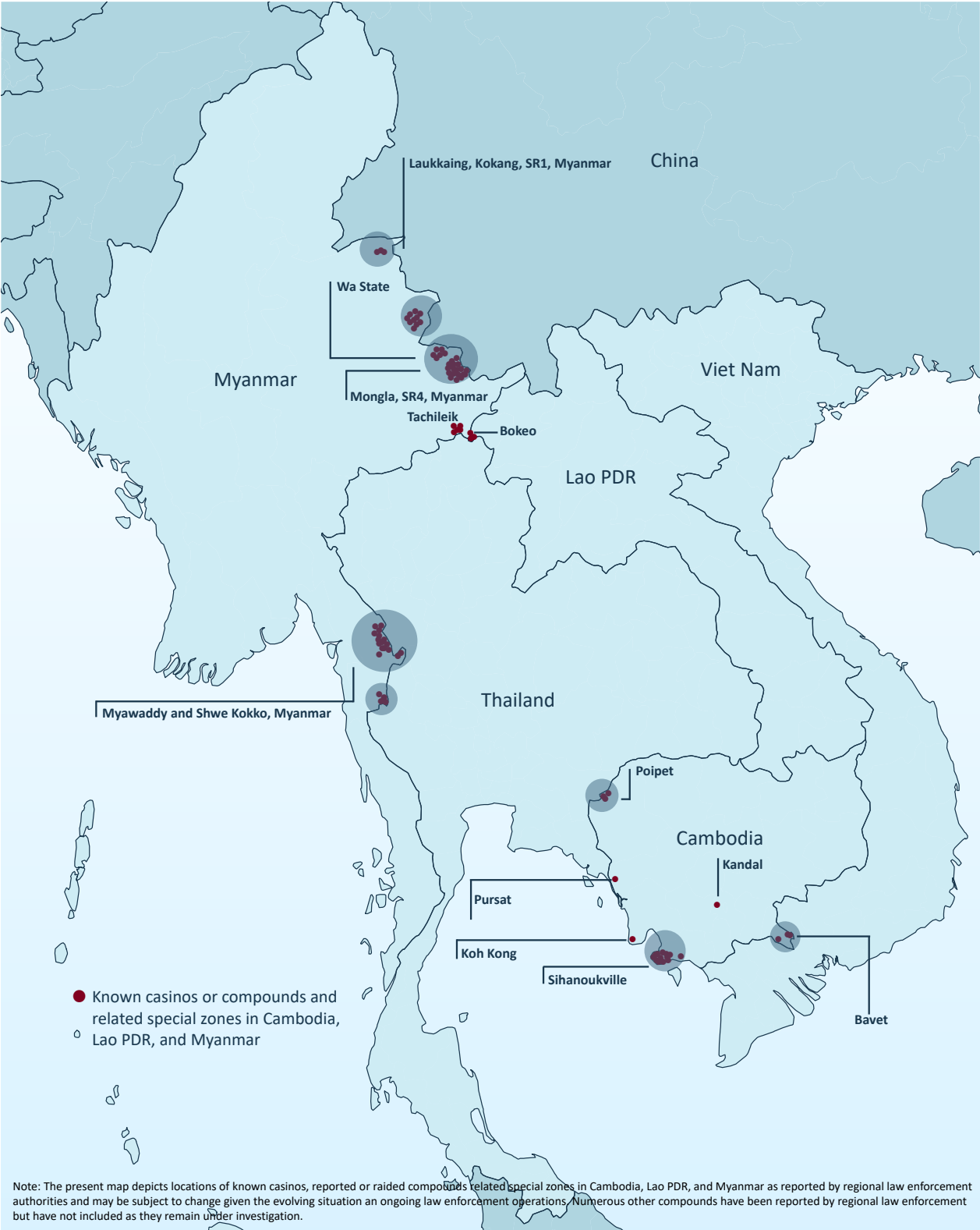


Table 1: Modus operandi of trafficking networks



knowledge of cryptocurrency. Trafficking victims are lured by job advertisements and social media posts that offer professional positions in customer service, business management, communications, or Human Resources (HR), with high pay and additional bonuses such as free housing and coverage of international travel costs.

Some victims are also recruited face to face by individual agents, or through recruitment agencies. The victim secures the ‘job’ after one or more false job interviews, signs a six-month work ‘contract’, then travels to Southeast Asia for what they believe will be an exciting new professional role.

Victim control tactics, such as restriction of movement, confiscation of personal documents, and physical abuse, are generally not required during the recruitment and transfer phase. However, soon after their arrival at the scam compound, trafficking victims may experience various methods of control, which include, but are not limited to, restriction of movement, physical abuse, and arbitrary fines and artificial debts (debt bondage).

Most trafficking victims are confined to the scam compound and have limited freedom of movement even within the compound itself. They are moved from the dormitory where they sleep, to the office where they are forced to conduct online scams and fraud, and then back to their dormitory after the long shift. Bathroom and meal breaks are short, and often monitored. The scam compounds are secured through bars on dormitory and office windows and balconies, high fences, and security staff who are positioned at the building entrance. Thus, it is extremely difficult for trafficking victims to attempt escape. Attempting to escape may result in injury, severe physical violence or even murder by the organized crime group.

Physical violence (electrocution and/or beatings) is used as a means of ensuring that trafficking victims meet their ‘sales quotas’ (the number of people scammed as well as the amount of money generated through the online scams and fraud). If the victims do not meet these targets, they may be punished by organized crime group members through physical violence and torture.

A system of fines and arbitrary debts is also imposed as a means of controlling victims. On arrival at the scam compound, most trafficking victims are told that they owe the organized crime group a debt for their recruitment and transfer, including fees paid to the recruitment agent, flight and ground transport costs, and accommodation costs. Some victims are reportedly told that they owe the organized crime group up to US\$25,000, and that they must conduct online scams and fraud until this fee is repaid. The artificial debts act as a means of psychological control of victims - victims retain hope that they can eventually repay the debt and be freed. Trafficking victims are further controlled through a system of fines imposed by the organized crime groups, which reportedly include fines for 'keyboard wearing', 'leg crossing', 'not finishing a meal', 'fighting with a co-worker', 'getting sick', and other items. The fine amounts vary, with smaller infringements, such as failing to put a chair away, costing a victim the equivalent of US\$14, and larger infringements costing a victim nearly US\$1,000. These fines are arbitrarily added up before 'pay day' and instead of receiving the sum promised, the victim only receives a small payment, if anything at all. This, in turn, affects the repayment of the victim's artificial recruitment and transfer debt, thus prolonging the victim's enslavement.

Victims are also controlled through confiscation of their personal documents (such as identification cards, and passport), confiscation of their personal mobile phone, and threats of being sold into sexual exploitation or having organs removed.

There is also another group that is emerging, but not discussed to a great extent in this brief, specifically the people working in the scam compounds who participate in illegal activities with a considerable degree of awareness and willingness, but who are not trafficking victims.

3. Organized crime groups are making significant profits from online scams and fraud

The organized crime groups profit from the illegal operations in several ways. In their daily work as forced scammers, trafficking victims reportedly generate hundreds of thousands of US dollars a week for the organized crime group. While the amount lost to the online scams and fraud varies

from scam victim to scam victim, some victims have reported losing millions of US dollars.³

The second way that the organized crime groups are making money is through extortion activities. The organized crime groups offer to release a trafficking victim if the victim's family pays a ransom for their release. These ransom fees reportedly range from US\$3,000 to US\$30,000. Following a ransom payment, a victim may or may not be released by the organized crime group.

The third way that organized crime groups are making profit is directly through further exploitation of the trafficking victims, specifically through their sale to other scam compounds, or to other groups for the victims' sexual exploitation or other forms of exploitation.

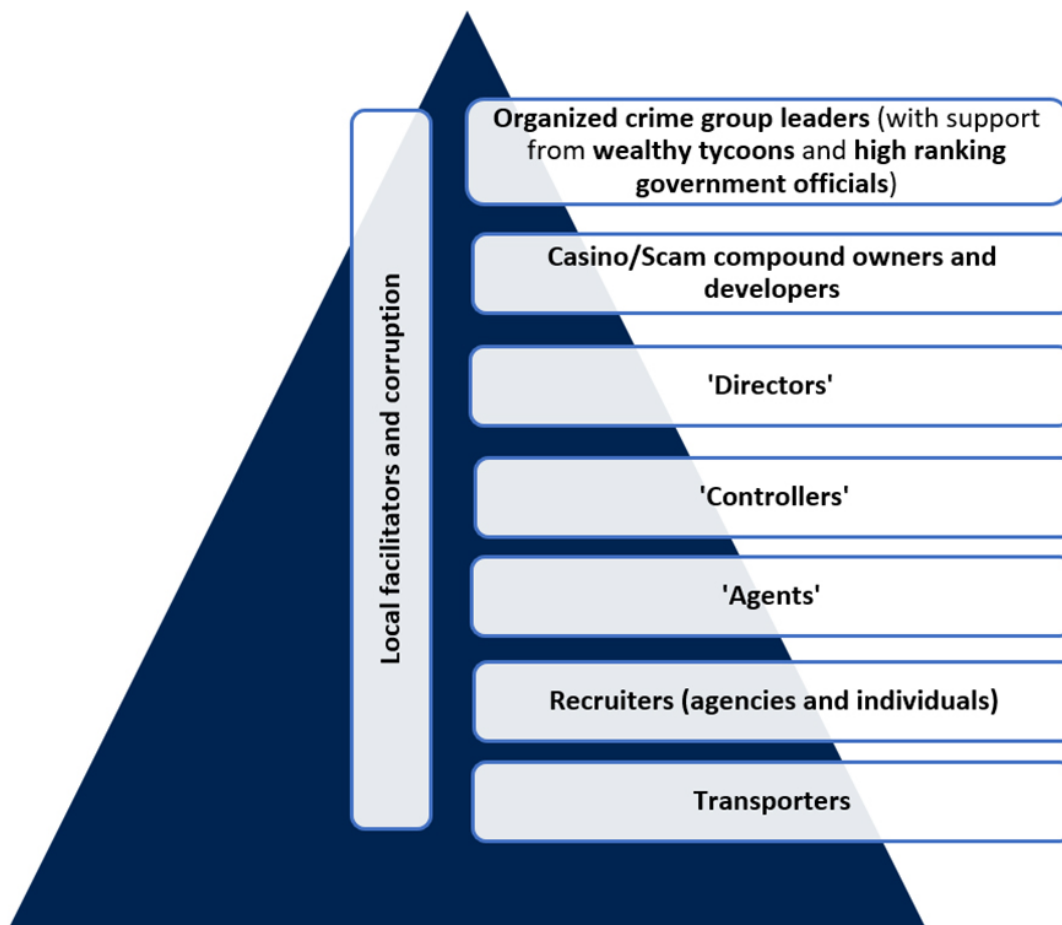
4. A range of offenders interact to coordinate the online scams and fraud, and trafficking in persons

A range of offenders and facilitators interact to coordinate the online scams and fraud, and trafficking for forced criminality in Southeast Asia. At the top of the crime pyramid are **organized crime group leaders**. Playing an integral role in the operation of the online scams and fraud, and trafficking for forced criminality are the **scam 'directors'**.

These individuals are responsible for overseeing the day to day running of the scam compounds, and managing the work of the various offenders who work in the compounds. Under the scam 'directors' are the various **'controllers'** in the scam compounds. The controllers are responsible for controlling the group of trafficking victims that are under their responsibility. They ensure that the victims meet their sales quotas through threats and use of force. A large number of **'agents'** play important roles in the criminal operations. Agents are responsible for, among other things, organizing trafficking victims' transport to and between the scam compounds, and securing the retrieval or release of trafficking victims who have escaped and/or are being held in immigration detention facilities.

³ INTERPOL, 2022, Operational analysis: Online scams and human trafficking in South East Asia.

Figure 2: Hierarchy of offenders in trafficking for forced criminality



Also integral to the criminal operations are the various actors that are responsible for recruiting trafficking victims to conduct the online scams and fraud. A significant amount of victim recruitment occurs through fraudulent job advertisements and posts on social media. Benign advertisements and posts on Facebook (Meta), WeChat, and various other sites offer well-paid professional positions in Southeast Asia or sometimes Dubai, United Arab Emirates (UAE). The advertisements and posts rarely provide information on the companies that are purportedly recruiting. However, some recruitment occurs face to face in the victim’s home country. Face to face **recruiters** are usually nationals of the trafficking victim’s country of origin. Recruiters approach potential victims in a variety of places, including the victims’ work location, where they tell the potential victim that they can earn a lot more money doing interesting work in Southeast Asia. Recruitment agencies in the victim’s country of origin are also involved in victim recruitment. Some recruitment agencies reportedly know that the job advertisements are fraudulent and are simply being

paid to provide a ‘front’ to lure unsuspecting migrant workers into forced criminality in Southeast Asia. Recruiters are also operating in transit countries. Recruitment agencies, operating in Dubai, for example, reportedly hire victims for legitimate jobs only to be told that the company has shifted their position to Thailand, Cambodia, or Lao PDR. Not realizing they are being deceived, victims agree to be transferred only to find themselves enslaved in a scam compound run by organized crime groups.

A range of **transporters and logistics providers** also lend support to the organized crime operations. For example, smugglers are enlisted to guide trafficking victims who have arrived in Thailand by air to the border with Myanmar, then across the river into Myanmar, and to the scam compound. Corrupt government officials further facilitate the transnational organized crime operations by allowing the irregular entry of trafficking victims into the transit or destination countries or retrieving and returning escaped victims to the scam compounds.

5. The profile of victims highlights that this is a global problem

International NGOs and other agencies have identified over 40 nationalities of trafficking victims in scam compounds in Southeast Asia, including Bangladesh; Cambodia; People’s Republic of China; Hong Kong, China; Indonesia; Malaysia; Myanmar; The Philippines; Taiwan Province of China; Thailand; and Viet Nam.

Both men and women are targeted by organized crime groups to conduct the online scams and fraud. While it is currently impossible to estimate the true scale of trafficking for forced criminality in Southeast Asia, the majority of trafficking victims are young men.

Most trafficking victims are young, educated, multi-lingual professionals, between the age of 20 and 30 years. However, some child victims of trafficking for forced criminality have also been identified in Cambodia and Myanmar. These children are at acute risk of being trafficked for sexual exploitation (some documented cases), after failing to meet their online scam and fraud sales quotas.

6. Responses to trafficking for forced criminality are inadequate

While regional coordination on combating trafficking for forced criminality is improving in Southeast Asia, significant challenges remain. In the area of victim rescue, law enforcement are reluctant to enter SEZs to rescue victims. There are also major challenges associated with rescuing victims from remote areas of Myanmar that are not controlled by the government. There is a lack of Standard Operating Procedures (SOPs) to guide the conduct of rescues, especially in countries that were previously predominantly source countries of trafficked victims.

In the area of victim identification, there is a lack of victim screening and identification occurring in transit and destination countries, despite the fact that some countries have mechanisms in place. Instead, victims are usually identified as irregular migrants, placed in immigration detention, fined, and deported. Law enforcement officers lack knowledge of the indicators of trafficking for forced criminality.

In the area of victim protection, there is an acute lack of protection and support provided to trafficking victims. Rather than receiving protection, most victims are instead penalized. They are charged with labor law and/or immigration offences, and some are also charged with criminal offences. This is contrary to the non-punishment principle, which states that ‘trafficked persons should not be subject to arrest, charge, detention, prosecution, or be penalized or otherwise punished for illegal conduct that they committed as a direct consequence of being trafficked.’⁴

Investigations and prosecutions are also inadequate. Limited regional coordination between law enforcement agencies, as well as a considerable level of protection provided to the criminal groups by high-ranking government officials, make conducting joint operations extremely challenging. Another major challenge in conducting joint investigations is that the source and destination countries do not see eye to eye on whether the victim is a trafficking victim. Another problem is that trafficking for forced criminality is viewed by destination country governments as a ‘foreigner on foreigner’ problem, meaning that the offenders are foreign nationals, as are the victims. This allows States to shirk their trafficking in persons investigation and prosecution responsibilities.

Regional cooperation is also lacking. Bilateral SOPs for rescue and repatriation remain under development. There is also a lack of effort to develop centralized databases to share data and information on trafficking for forced criminality (data on victims, locations of exploitation, offenders etc). This limits the ability of relevant agencies to quickly respond to reported cases of trafficking for forced criminality, as well as the ability of the international community to understand the scale of the problem.

⁴ The Inter-Agency Coordination Group against Trafficking in Persons, n.d, Issue brief: Non-punishment of victims of trafficking: https://www.unodc.org/documents/human-trafficking/ICAT/19-10800_ICAT_Issue_Brief_8_Ebook.pdf

Recommendations

The Brief concludes that States in Southeast Asia, with support from international organizations and NGOs, should implement, as soon as possible, the following policy recommendations:

Legal and policy frameworks:

- Create new or update existing bilateral Memoranda of Understanding (MOUs) to take into account the current phenomenon of trafficking for forced criminality and reversed trafficking trend (historically countries of source that have now become countries of destination).
- Create local level (provincial and district) MoUs and SOPs and draft guidelines to enable swift cross-border victim rescues and repatriations.

Victim rescue:

- Collaborate to strengthen the current victim rescue mechanisms. Ad hoc rescue processes should be replaced by standardized MoUs and other agreements for conducting victim rescues.
- Ensure victim rescues are proactive rather than reactive. Law enforcement should not wait to compile a list of rescue requests from victims, their families, and embassies but should, rather, identify scam compounds that are suspected of confining trafficking victims, and organize the raid of the compound and rescue of everyone trapped, not just persons listed.
- Ensure embassies are playing a coordinated, proactive role in victim rescues. Victims who are supported through proactive embassies are more likely to be quickly rescued and offered assistance and protection than victims who are not supported by their embassy.
- Ensure that information on victim rescues is quickly and routinely shared with the victim's country of origin government through embassies or directly with Ministries of Foreign Affairs.

Victim identification:

- Ensure that all people who escape or are rescued from the scam compounds undergo a proper victim screening process by a relevant State agency (e.g. the counter trafficking police units) and are swiftly referred to victim support mechanisms.
- Adapt existing victim identification tools to take into account the UNODC indicators of trafficking for forced criminality.
- Standardize victim identification criteria tools across the Southeast Asia region.

Victim protection and repatriation:

- Ensure suspected victims of trafficking for forced criminality receive immediate protection and support following their escape or rescue from the scam compound, including shelter, healthcare, psychosocial counselling, legal aid, and consular support.
- Continue to strengthen protection and assistance infrastructure, such as shelters (especially for male victims), and reintegration service provision (health, psychosocial counselling, legal aid, employment training etc.).
- Finalize national referral mechanisms (NRMs) where they are not already complete, and provide training to all relevant State and non-State personnel in the country to enhance their understanding regarding the NRM.
- Draft NRM guidelines and organize NRM capacity building sessions to facilitate implementation across the country.
- Monitor NRMs to ensure they are functioning effectively and efficiently.
- Continue to develop a transnational referral mechanism (TRM) for the region, which builds on existing NRMs and enhances bilateral and regional mechanisms for victim referral and protection.

- Uphold the non-punishment principle at all times and ensure that it is well understood by all relevant entities (Police, Immigration, etc.) through regular and ongoing capacity building.
- Ensure suspected trafficking victims are not transferred to immigration detention, made to pay visa over-stay fines, or prosecuted for crimes that they were forced to do when they were trafficked. Victims who have been added to an Immigration blacklist should be removed from this list.

Investigation and prosecution:

- Strengthen law enforcement capacity and efforts to investigate organized crime in Southeast Asia, particularly online scam and fraud operations, trafficking for forced criminality, money laundering, and allegations of officials complicit in these operations. Investigations should be proactive, rather than reactive.
- Establish at the national level, if not already in place, specialized units comprising of agencies addressing various forms of criminality (money laundering, counter-trafficking, corruption, cyber-crime) to coordinate domestic response. This model should be elevated to the regional level, where focal points of domestic forces can coordinate information sharing and implement a regional response plan (*see Regional Cooperations section*).
- Conduct investigations and prosecutions of online scams and fraud in collaboration with cyber and technology companies that may complement the capabilities of enforcement agencies.
- Collect and document available information, intelligence and other available evidence during debriefings with rescued and repatriated victims to ensure that victim testimony is captured and used during investigations and prosecutions, and transnational organized crime and trafficking in persons trends can be better understood.
- Increase the monitoring of online scams and fraud by law enforcement, and training of illicit flows to document financial crimes and money laundering activities, with support from financial institutions and technology service providers.
- Train law enforcement (police, Immigration) and criminal justice practitioners to ensure that they are familiar with UNODC’s indicators of trafficking for forced criminality.
- Encourage strong anti-money laundering investigations and prosecutions to effectively implement the Financial Action Task Force (FATF) recommendations, including the use of non-conviction-based forfeiture.

Prevention:

- Develop public awareness campaigns to educate individuals about the risks and tactics used by criminal groups to prevent them from being victims of scams or victims of trafficking to commit scam and fraud.
- Leverage the power of peer influence by engaging youths in the planning and development process of public awareness campaigns, including through collaboration with schools, universities, and youth organizations where appropriate.
- Review the content of public awareness campaigns on transnational organized crime and trafficking for forced criminality associated with casinos and scam operations periodically to ensure that information disseminated remains relevant to the target audience.
- Invest in improving financial and technological literacy, particularly among communities who are most likely to be targeted by criminal groups associated with casinos and scam operations.
- Utilize social media platforms and engage with technology companies to develop and implement prevention campaigns.
- Encourage the private sector to withdraw their services to the scam compounds (e.g., Internet providers could revoke the supply of Internet to scam compounds in border areas).

Regional cooperation:

- Develop a centralized Southeast Asia database that provides a mechanism for storing and sharing important data on trafficking for forced criminality (number of victims, nationalities; details of suspected offenders; number and progress of investigations; number and progress of prosecutions; and court case reports).
- Develop comprehensive, coordinated, and regional responses to address all forms of poly-criminality that feed into the transnational organized crime threat. High-level political commitment needs to be manifested through the development of a clear framework or roadmap to address transnational organized crime, which can be operationalized at national and international levels.
- Enhance international cooperation in criminal matters to address operations of transnational organized criminal groups facilitating trafficking in persons through utilization of the existing multilateral mechanisms, including the United Nations Convention Against Transnational Organized Crime, the ASEAN Treaty on Mutual Legal Assistance in Criminal Matters, and existing bilateral agreements among Southeast Asian States.
- Develop practical SOPs to enhance existing cross-border cooperation mechanisms and ensure efficient and consistent responses from relevant State entities at the domestic and regional level.
- Establish robust public-private partnerships, including through stronger relationships between law enforcement and the private sector (cyber and tech companies), for the purpose of investigating illicit financial flows.
- Strengthen regional cooperation by organizing policy dialogues that bring together States, NGOs, and international organizations to share information on trafficking for forced criminality trends to inform existing strategic and formulation of evidence based policies.



UNODC

United Nations Office on Drugs and Crime

Regional Office for Southeast Asia and the Pacific

United Nations Building, 4th floor B Block, Secretariat Building, Raj Damnern Nok Avenue, Bangkok 10200, Thailand
Tel. (66-2) 288-2100 Fax. (66-2) 281-2129 E-mail: unodc-thailandfieldoffice@un.org

Website: <http://www.unodc.org/roseap>

 Twitter: @UNODC_SEAP