# MEKONG CLUB

## SAFEGUARDING AIR TRAVEL: RECOMMENDATIONS FOR THE AIRLINE INDUSTRY TO PREVENT MISUSE BY SCAM CENTERS

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# I. Introduction: What Are Scam Centers?

Scam centers are organized operations, often run by criminal networks in Southeast Asia, that use deceptive tactics to carry out fraudulent activities. They have become notorious for their involvement in human trafficking—luring individuals under the guise of legitimate employment and coercing them into executing fraudulent schemes through threats and violence. According to the U.S. Institute of Peace, these scam centers generate an estimated $43.8 billion annually through scam operations, exploiting both trafficked individuals and victims of fraud.[1]

# II. Misuse of Airline Industry by Scam Centers

The airline industry, with its extensive global reach and infrastructure, plays an unwitting yet critical role in facilitating human trafficking associated with scam centers; however, it also holds significant influence and responsibility to establish proactive standards for prevention and intervention regarding human trafficking linked to scam centers.

Under the United Nations Guiding Principles on Business and Human Rights ("UNGPs"), business enterprises (including airlines and aviation-industry actors) have a corporate responsibility to respect human rights, which includes conducting ongoing human-rights due diligence: to identify, prevent, mitigate and account for adverse human-rights impacts linked to their operations or business relationships.[2] UNGP clarifies that a company must have processes for human-rights due diligence and remediation mechanisms for any adverse human-rights impacts it causes or contributes to.

In addition, the ICAO Circular 362 ("Guidelines for Combatting Trafficking

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[1] United States Institute of Peace (USIP), Senior Study Group Final Report: "Transnational Crime in Southeast Asia — A Growing Threat to Global Peace and Security," May 2024.

[2] Office of the High Commissioner for Human Rights (OHCHR), "Introduction to the Guiding Principles on Business and Human Rights," December 2013.

in Persons in the Air Operator Supply Chain") issued by the International Civil Aviation Organization (ICAO) and the Office of the United Nations High Commissioner for Human Rights (OHCHR) emphasizes the need for air operators to apply supply-chain due diligence and transparency in order to prevent trafficking in persons. [3]

Criminal networks operating these scam centers frequently misuse commercial air travel to transport victims across borders, leveraging the speed and accessibility of air travel. Victims are often targeted through deceptive job advertisements on social media platforms, which promise high-paying job opportunities abroad. Once recruited, traffickers manage travel logistics- including passport processing, visa applications, and flight bookings, to ensure the victim's seamless transit to the destination country.

Upon arrival, victims are stripped of their documents and forced to participate in illicit schemes such as investment scams or romance scams often under threats of violence and physical confinement. This trafficking pipeline allows scam networks to continuously replenish their workforce while avoiding detection.

Identifying and intercepting such transportation activities requires heightened vigilance, cross-sector collaboration, and a nuanced understanding of the evolving strategies used by traffickers.

The following recommendations aim to improve the airline industry's ability to detect, monitor, and prevent scam-related human trafficking operations:

## A  Staff Training Programs

Airlines should implement specialized training programs for all frontline personnel cabin crew, ground staff, check-in

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[3]  International Civil Aviation Organization, Circular 362: Guidelines for Combatting Trafficking in Persons in the Air Operator's Supply Chain (Advance edition – unedited), 2024.

agents, and call center representatives—to help them identify and appropriately respond to signs of human trafficking. With the right training, airline, airport, ground handling, security screening, and customs personnel can serve as a critical line of defense by spotting suspicious behaviors associated with trafficking. Once trained, airline, airport, ground handling, security screening and customs staff can provide an important source of intelligence to prevent human trafficking and can recognize behaviors consistent with trafficking situations and report their observations to the authorities both at airports and during flights. Resources developed by organizations such as the International Air Transport Association (IATA) and ICAO [4] provide comprehensive guidelines and training materials that support these efforts. [5]

To ensure effective response, staff should also be equipped with clear protocols for discreetly escalating suspicious cases, including:

1. Notifying airport security or immigration without alarming the passenger.

2. Delaying boarding for further questioning when red flags are identified.

3. Ensuring victim-centered handling of potential trafficking cases protecting individuals from retaliation or further coercion.

In addition, alerting law enforcement authorities in destination or transit countries can play a critical role in preventing potential victims from being trafficked into scam compounds. For instance, the Royal Thai Police's Immigration Bureau ("the Bureau") has identified that Thailand is increasingly being

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[4] Tool for Capacity Building of Cabin Crew Identifying and Responding to Trafficking in Person.

[5] See IATA indicator card for a comprehensive list of common signs used to identify potential human trafficking.

used as a transit point by online scam criminal networks to move victims from various countries to neighboring scam centers. In response, the Bureau has implemented enhanced screening procedures at border checkpoints and airports to identify individuals who may be at risk of being deceived into fraudulent employment. Immigration officers assess travelers' profiles to determine whether they have sustainable livelihood and a well-defined travel plan upon entry into Thailand. Individuals lacking clear travel purposes or sustainable means of support are flagged for additional questioning, and where trafficking risk indicators are present, entry is denied. In 2023 alone, Thailand refused entry to 4,974 foreign nationals deemed vulnerable to such exploitation. [6]

## B  Passenger Behavior

Certain behavioral cues and travel patterns may signal exploitation or trafficking linked to scam centers. Observing and identifying these signs, particularly at check-in, boarding gates, and during flights, can support early intervention.

### Incomplete or inconsistent travel documents

Victims are often instructed to travel using only paperwork provided by recruitment agencies, which may refer vaguely to "training," "internships," or "orientation" abroad. These documents often do not match the individual's visa type or stated travel purpose. Common discrepancies include:

- Lack of employment contracts or contact details for overseas employers.

- Uncertainty about destination, job description, or accommodation details.

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6  Royal Thai Government's Country Report on Anti-Human Trafficking Efforts, 2023.

## Suspicious passenger behavior

Victims may appear visibly nervous, avoid eye contact, or seem overly rehearsed when responding to simple questions. Many travel in groups, accompanied by handlers who:

- Speak on their behalf.

- Retain their passports or boarding documents.

- Display a controlling or overprotective demeanor.

Passengers may show signs of emotional distress or confusion about the nature of their trip. In many cases, individuals are reluctant to engage with staff or authorities, which can further indicate coercion or deception. Additionally, passengers traveling together but exhibiting little familiarity or interaction with one another may warrant concern. Genuine travel companions, such as friends or families on vacation, typically engage and communicate throughout the journey, whereas groups displaying minimal connection or interaction may indicate organized movement for exploitative or fraudulent purposes.

## Multiple passengers carrying identical travel documents

Victims are often instructed to travel in groups by traffickers or criminal recruiters. As a result, multiple individuals may arrive at the same destination using identical or near-identical travel documents—sometimes forged or fraudulently obtained—raising red flags for human trafficking or scam-related activity.

These documents—sometimes forged or fraudulently issued—may include:

- The same job offer letters.

- Identical sponsor information.

- Matching itineraries or cover stories.

Such uniformity may reflect organized trafficking activity and should raise concerns, particularly if the passengers lack individual knowledge about the trip's purpose. This tactic is commonly used to facilitate the transport of victims to scam centers.

## C  Passenger Data Verification

Robust data verification processes are essential in detecting and preventing the movement of trafficking victims, especially those being transported under the guise of legitimate travel to scam centers. Airlines and airport authorities should integrate data review protocols into existing security and check-in workflows.

○ **Document Checks**

Airlines and immigration authorities should verify that the identity documents presented by passengers align with the details on their tickets and bookings.

**Key checks include:**

- **Passport validation:** Ensure the passport is genuine, not altered, and not expired.
- **Photo and name match:** Verify that the passenger matches the photo and name on the passport and booking records.

**Red flags include:**

- Multiple passengers with identical or near-identical biographical data.
- Travel documents issued recently and in quick succession for a group.
- Documents bearing signs of tampering, inconsistent fonts, or poor-quality prints.

## Cross-checking travel purpose and supporting documentation

Airlines and ground staff can flag discrepancies between the purpose of travel and the supporting documents. This may involve:

- Reviewing invitation letters or employment contracts when applicable.
- Asking passengers to provide details of their itinerary or host/employer.
- Verifying return or onward travel tickets to ensure round-trip consistency.

## API and PNR analysis

Advanced Passenger Information (API) and Passenger Name Record (PNR) data can be analyzed to detect patterns common in trafficking scenarios:

- Multiple bookings made using the same email address, phone number, or credit card.
- Large group bookings with sequential or near-identical passport numbers.
- Repeated travel patterns involving known high-risk transit or destination points.
- Last-minute changes to itinerary or payment by a third party.

## D     Raise Awareness about Flight Booking Red Flags

Airlines should leverage advanced passenger profiling systems and technology-driven analytics to identify and flag suspicious booking behaviors commonly associated

with human trafficking and scam-related travel. Key red flags may include:

- One-way ticket to high-risk jurisdictions Cambodia, Myanmar, Laos, and Thailand—countries known to host scam compounds and trafficking operations.

- Round-trip tickets where the return leg is quickly canceled after departure, often done to avoid scrutiny by border authorities or to give the appearance of legitimate travel.

- Last-minute bookings for long-haul international flights, which may indicate an attempt to avoid detection or thorough vetting.

- Group bookings involving multiple passengers on similar itineraries, with closely timed departures. These often signal organized movement of recruits or victims by trafficking networks or scam operations.

- Inconsistencies between flight itineraries and visa conditions, such as a return flight scheduled months later despite holding a short-stay visa (e.g., a six-month return booked on a 30-day tourist visa).

- Frequent travel by a known companion escorting multiple individuals.

## E  Enable and Promote Anonymous Reporting Mechanism

To combat the trafficking and exploitation of individuals lured by fake overseas job offers—especially in connection with scam centers—airports and airlines are recommended to implement well-publicized, easy-to-use anonymous reporting channels. These mechanisms would empower both victims and bystanders to report suspicious activity discreetly and safely, particularly in high-risk transit zones.

Airports should be equipped with multilingual awareness campaigns—including posters, videos, in-flight announcements, and digital signage—highlighting the risks of deceptive job offers abroad. Messaging should include:

- Warnings about fraudulent job recruiters targeting vulnerable populations.

- Red flags travelers should look out for in employment offers.

- Instructions on how to report suspicious activity anonymously and safely.

Creative placement of materials such as QR code enabled flyers in airport restrooms, waiting areas, or boarding gates-can offer discreet access to online reporting forms or hotlines. This ensures passengers or witnesses can make a report without drawing attention.

### Examples of successful initiatives include:

- **The Blue Lightning Initiative (BLI)** in the United States, spearheaded by the U.S. Department of Transportation and U.S. Customs and Border Protection trains aviation industry personnel to spot signs of human trafficking and encourages immediate reporting to law enforcement. To date, over 150 aviation partners have joined BLI, resulting in over 400,000 employees trained. BLI also uses aircraft and airport signage to inform the public about trafficking and how to report concerns.[7]

- **The National Police Agency of Taiwan** published a detailed flowchart for handling cases of Taiwanese citizens deceived into seeking employment abroad. This document outlines

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7   See US Department of Transportation Blue Lightning Initiative – "Recognize and Report Human Trafficking" included in the References section.

into seeking employment abroad. This document outlines response protocols and includes reporting hotlines—ensuring swift coordination between airport officials, police, and NGOs.

The following image is a flowchart from the National Police Agency of Taiwan illustrating the process for handling cases of Taiwanese citizens being defrauded into seeking employment abroad. The flowchart is titled "Process for Handling Cases of Taiwanese Citizens Being Defrauded into Seeking Employment Abroad" outlining the steps taken when a person is suspected of being scammed into seeking work overseas which includes call numbers for reporting.



■ Billboard [8] displayed at **Narita Airport in Tokyo**, Japan warning about fraudulent overseas job offers. The sign states: *"Don't trust sweet temptations. Jobs that promise to make money overseas are dangerous! You may be threatened, confined, forced to participate in crime. You could even be killed. It's not too late—call #9110 now. National Police Agency."* This public awareness campaign highlights the risks of human trafficking and fraud targeting travelers.

## F    Leverage Artificial Intelligence (AI) to Detect Suspicious Travel Patterns

AI can play a critical role in identifying human trafficking victims and those being routed to scam centers under false pretenses. AI systems can analyze vast volumes of travel-related data in real time, far beyond the capacity of manual screening, to detect suspicious patterns that would otherwise go unnoticed by manual screening and offers powerful tools to detect suspicious travel patterns, enabling airlines to intervene before victims board flights.

While large-scale deployment of AI for trafficking detection is still in early stages, the technology represents a significant opportunity for the airline industry to evolve from reactive to preventive action. By starting with pilot programs, data-sharing partnerships, and transparent governance frameworks, airlines can test these tools responsibly and position themselves as leaders in using innovation to combat organized exploitation.

Below outlines a practical, forward-looking framework for how airlines could responsibly leverage AI in this effort:

## Data Aggregation and Feature Engineering

AI systems rely on comprehensive datasets to identify anomalies. Airlines can aggregate data from multiple sources to build a robust foundation for analysis:

- **Booking Data:** Information such as passenger names, booking dates, travel dates, destinations, payment methods, and booking channels (e.g., online, travel agencies, or third-party platforms).

- **Passenger Profiles:** Historical travel patterns and frequent flyer data, and demographic information (while adhering to privacy regulations).

- **External Risk Indicators:** Data from law enforcement, industry watchlists, or shared airline consortiums about known scam-related destinations or patterns.

- **Behavioral Data:** Patterns such as such as repeated one-way internet searches for specific destinations or multiple bookings made from the same IP address in short succession.

## Real-Time Monitoring and Early-Warning Systems

Emerging AI-driven monitoring tools could assist airlines in flagging high-risk cases before boarding.

- **Risk Scoring Models:** Pilot projects in some airports and major carriers have explored assigning dynamic risk scores to bookings based on data patterns (e.g., young adults traveling alone to high-risk destinations). High scores can trigger a secondary verification step rather than automatic denial of boarding.

○ <u>Adaptive Rules and Pattern Recognition:</u> AI systems can continuously refine rule-based alerts, flagging, for instance, last-minute one-way tickets or unusual group bookings that deviate from typical leisure or business travel behavior.

○ <u>Integration with Check-In Procedures:</u> AI insights can inform subtle engagement by frontline staff during check-in or boarding, such as asking clarifying questions about the traveler's plans when red flags appear.

These systems, when paired with human oversight and collaboration with law enforcement, could enable early intervention and potentially prevent victims from being transported to scam operations.

## G   Collaboration and Cross-Industry Data Sharing

Effective collaboration between airlines, law enforcement, and international organizations is critical to combat scam centers misusing air travel for victim trafficking. Coordinated efforts can enhance detection, enable timely interventions, and dismantle recruitment networks.

### Leverage Regional and International Platforms:

Utilize platforms like INTERPOL's I-24/7 system, Europol's EMPACT (European Multidisciplinary Platform Against Criminal Threats), and the International Civil Aviation Organization (ICAO)'s Traveler Identification Programme (TRIP) to track transnational patterns and coordinate interventions.

### Establish Multi-Stakeholder Information-Sharing Protocols:

Develop secure and standardized channels for exchanging passenger data, red flag indicators, and known trafficking

routes across jurisdictions. This includes cross-referencing visa issuance data, passenger booking behavior, and flagged entities or recruiters. This enables:

- Pre-departure flagging of high-risk passengers.

- Real-time alerts when suspect travel profiles are detected.

- Blacklisting of recruitment agencies or coordinators with a known history of trafficking-linked travel arrangements.

## Use Data to Map and Disrupt Recruitment Channels

Joint analysis of travel, recruitment, and job application patterns can expose the networks behind fake job offers. Trends such as repeated bookings from the same agency, clusters of passengers with similar background stories, or coordinated travel to specific scam centers can inform broader counter-trafficking strategies.

## III.   Conclusion

The misuse of air travel by scam centers and trafficking networks demands a coordinated, multi-layered response across the aviation, security, and law enforcement sectors. By enhancing passenger screening protocols, leveraging AI-driven analytics, promoting awareness, and fostering cross-industry data sharing, stakeholders can disrupt criminal operations before victims reach their destinations. From pre-departure interventions in high-risk countries to in-flight observations and post-arrival reporting, every touchpoint in the travel journey presents an opportunity for prevention. Protecting vulnerable travelers is not only a legal and moral imperative but a shared responsibility that requires vigilance, innovation, and collaboration at every level. Strengthening supply chain management and ensuring that air operator practices are free from trafficking risks are also essential elements of a comprehensive prevention framework. [9]

## IV.   References

A.   IATA Indicator Card

B.   Department of Transportation Blue Lightning Initiative.

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[9]   See ICAO Circular 362: Guidelines for Combatting Trafficking in Persons in the Air Operator's Supply Chain.