

Financial Service Provider and Online Sexual Exploitation of Children: A Lacunae in Indonesia Legal Framework?

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Abstract

Online sexual abuse and exploitation of children is a serious global issue nowadays. In Indonesia, data from the Ministry of Women's Empowerment and Child Protection (*KemenPPA*) shows that the number of reported child violence cases reached 24,158 in 2023. Of this total, sexual violence was the most common, with 10,932 cases. The key problem lies in the gap within the Legal Framework for addressing Child Sexual Exploitation in Indonesia. The issue is becoming more serious because the financial sector also plays a role, as perpetrators use financial means to carry out their actions. This has not been adequately addressed by Indonesia's legal framework. Although Indonesia has prohibited and imposed penalties for perpetrators of child sexual exploitation and online sexual exploitation (for example, through the Criminal Code, Child Protection Law, Law on Sexual Violence, Pornography Law, and Electronic Information and Transactions Law), efforts to address the misuse of the financial sector by perpetrators have not been reflected in laws governing the financial services sector (such as the Indonesia Financial Services Authority Law, Banking Law, Indonesia Financial Services Authority Regulations, etc.). This paper, through a doctrinal research approach, examines the extent to which Indonesia's legal framework addresses child sexual exploitation in

accordance with international standards, conventions, trends, and developments. By analyzing how other countries—such as England, Wales, Sweden, the United States, and Australia—handle child sexual exploitation, particularly in relation to financial service providers, Indonesia can learn valuable lessons. In conclusion, this paper finds that Indonesia’s legal framework is insufficient to address child sexual exploitation and abuse involving financial means.

Keywords

Children, Online Sexual Exploitation, Financial Sector.

Introduction

The findings from a meta-analysis of 217 publications spanning from 1980 to 2008, which encompassing 331 independent samples and a total of 9,911,748 participants, validate the widespread and significant nature of childhood sexual abuse (CSA) as a global issue.¹ Violence perpetrated against individuals under the age of 18 encompasses various acts of harm inflicted by parents, caregivers, peers, partners, or strangers. Approximately 1 billion children between the ages of 2 to 17 have reportedly encountered physical, sexual, or emotional violence, or neglect within the past year worldwide. Research findings across different regions indicate the preventability of violence against children.²

It is estimated that globally, around 1 billion children between the ages of 2 and 17 experience some form of child maltreatment during their upbringing. The prevalence of sexual victimization among children and adolescents is a significant concern, with the sexual exploitation of children (SEC) being the least comprehensively understood form. The U.S. Centers for Disease Control and Prevention advocates for an ecological framework that examines violence against children through four contextual lenses—individual, relationship, community, and

¹ Stoltenborgh, Marije, et al. “A global perspective on child sexual abuse: Meta-analysis of prevalence around the world.” *Child maltreatment* 16.2 (2011): 79-101, <https://doi.org/10.1177/1077559511403920>.

² World Health Organization, “Violence Against Children,” World Health Organization, 2022.

societal—to better interpret evidence related to violence against children, including instances of sexual exploitation.³

Related to the above data, WeProtect Global Alliance has released its fourth Global Threat Assessment Report, which provides critical insights into the threats children face online in 2023, also found there has been a 360% increase in self-generated sexual imagery of 7-10-year-olds from 2020 to 2022 (Internet Watch Foundation). The research found a significant rise in financial sexual extortion, with reports of the harm jumping from 139 in 2021 to over 10,000 reports in 2022.⁴

Research indicates a widespread prevalence of child sexual abuse and exploitation on a global level, with more than 300 million children being affected each year. This estimate encompasses various forms of online sexual abuse and exploitation, including non-consensual sharing and exposure to sexual content, as well as online solicitation involving unwanted sexual communication. Additionally, offenders may engage in coercive behaviours such as “sextortion” using advanced AI deepfake technology to manipulate victims.⁵

Concerning Indonesia, data from the Ministry of Women’s Empowerment and Child Protection (*KemenPPA*) shows that the number of different types of child violence cases reached 24,158 reported cases throughout 2023. Of this total, the most common type of violence was sexual violence, with 10,932 cases. There were also 4,511 cases of psychological violence against children, 4,511 cases of physical violence, and 1,332 cases of child neglect. Additionally, there were 260 cases of child exploitation, 206 cases of trafficking or child selling, and 2,507 cases of other types of violence. Ministry of Women’s Empowerment and Child Protection recorded that victims of violence may experience more

³ Moss, Corinne, et al. “A global systematic scoping review of literature on the sexual exploitation of boys.” *Child Abuse & Neglect* 142 (2023): 106244, <https://doi.org/10.1016/j.chiabu.2023.106244>.

⁴ WeProtect Global Alliance, “Alarming Escalation in Child Sexual Abuse Online Revealed by Global Threat Assessment 2023,” August 17, 2023, <https://www.weprotect.org/wp-content/uploads/Global-Threat-Assesment-2023-Press-Release.pdf>.

⁵ University of New South Wales, “More than 300 Million Child Victims of Online Sexual Abuse Globally: Report,” UNSW Media Childlight Global Child Safety Institute, May 27, 2024.

than one type of violence. Specifically, 16,884 victims were reported to have experienced one type of violence, while 2,794 victims experienced two types of violence, 485 victims experienced three types of violence, and 58 victims experienced more than three types of violence. Overall, there were 18,175 reports of child violence cases from January to December 2023. Of that total, there were 14,449 female child victims and 5,772 male child victims. This data was compiled based on the timing input from victims or reporters collected as of April 1, 2024.⁶

Among all Indonesian children experiencing various forms of sexual exploitation and other unwanted experiences in the online world, between 17 and 56 percent of them do not report the incidents. This is stated in the latest report from UNICEF, Interpol, and ECPAT, funded by the Global Partnership to End Violence against Children. The report titled “Disrupting Harm In Indonesia Presents Evidence Of Sexual Exploitation And Mistreatment Of Children In The Online World”. Data was obtained from household surveys of 995 children and caregivers, field service surveys, and interviews with government authorities and service providers. The research took place between November 2020 and February 2021, focusing on children aged 12-17 years. The report’s findings state that children in this age category are very active internet users, with 95 percent accessing the internet at least twice a day. Two percent, or around 500,000 children in Indonesia, reported being victims of sexual exploitation and mistreatment in the online world in the past year.⁷

In November 2022, experts from the United Nations recommended increased efforts to address the ongoing prevalence of violence, exploitation, abuse, trafficking, torture, and harmful practices targeted at children. They emphasized the need for healing and justice for victims and survivors. Public health policies and programs must incorporate greater awareness of issues such as child sexual abuse, child trafficking, exploitation, and violence, including within educational institutions. It is crucial to establish a comprehensive legal framework,

⁶ Nabilah Muhamad, “Ada 20 Ribu Korban Kekerasan Terhadap Anak Pada 2023, Ini Jenisnya,” , Katadata.co.id, April 2, 2024.

⁷ UNICEF Indonesia, “Data Survei Baru: Hingga 56 Persen Insiden Eksploitasi Seksual Dan Perlakuan Yang Salah Terhadap Anak Indonesia Di Dunia Maya Tidak Diungkap Dan Dilaporkan,” UNICEF Indonesia, July 22, 2022.

implement accountability measures, and provide appropriate training to law enforcement officials and the justice sector to ensure sensitivity to child-related issues. Furthermore, States Parties should prioritize collaboration at regional and international levels to prevent child sexual exploitation and violence and to safeguard child victims and survivors affected by the transnational nature of these crimes.⁸

The recent emergence of online sexual exploitation of children presents a significant challenge for the legal system and victim services. Advancements in technology have facilitated the live streaming of sexual abuse of children through web cameras and mobile devices, often with profit as a motive. Mobile apps are increasingly being used by offenders to target, recruit, and coerce children into engaging in sexual activities, as noted in a recent State Department report. Experts estimate that tens of thousands of children worldwide are being sexually exploited online, indicating a concerning trend. Another concerning development is the extortion of minors who are compelled to exchange sexual images via the internet, a practice that is exacerbated by the use of mobile devices and social media platforms. Offenders typically manipulate minors into sharing self-generated content online in exchange for financial gain, with threats of exposure if they refuse to participate in sexually explicit acts via webcam. Recent data from the Financial Crimes Enforcement Network (FinCEN) revealed a 147% increase in suspicious activity reports related to online sexual exploitation of children between 2017 and 2020, with a 17% year-over-year increase in 2020.⁹

The various data above indicate the increasing seriousness of the issue of child sexual exploitation in Indonesia, specifically online child sexual exploitation. The problem lies in a gap in the Legal Framework to address Child Sexual Exploitation in Indonesia. The issue is becoming more serious because the financial sector also plays a role, as perpetrators

⁸ United Nations Human Right, “Global Emergency of Child Exploitation and Abuse Need Global Action: UN Experts,” United Nations Human Right, November 18, 2022, <https://www.ohchr.org/en/statements/2022/11/global-emergency-child-exploitation-and-abuse-needs-global-action-un-experts>.

⁹ Jennifer M. Lafferty, “What Financial Institutions Can Do amid Worsening ChildSexual Exploitation Online,” Wipfli LLP, April 24, 2022, <https://www.wipfli.com/insights/articles/fi-ra-financial-institutions-role-in-investigating-online-child-sexual-exploitation>.

use financial means to carry out their actions. This has not been adequately addressed because of the legal framework in Indonesia. Although Indonesia has prohibited and threatened punishment for perpetrators of child sexual exploitation and online sexual exploitation (for example, with the Criminal Code, Child Protection Law, Law on Sexual Violence, Pornography Law, Electronic Information and Transactions Law), efforts to address the misuse of the financial sector by perpetrators have not been addressed with laws in the financial services sector (such as the Indonesia Financial Services Authority Law, Banking Law, Indonesia Financial Services Authority Regulations, etc.). The purpose of this writing is to discuss to what extent the legal framework in Indonesia addresses child sexual exploitation in accordance with international standards/conventions/trends/developments and to what extent Indonesia can learn from selected countries' legal frameworks and developments.

Literature review

1. Sexual Exploitation of Children (SEC) and Children Sexual Abuse (CSA)

Conceptually, the term SEC overlaps with the term child sexual abuse (CSA). While SEC requires an element of 'exchange' – which historically had referred to money – it is acknowledged that CSA can involve exchange through control mechanisms that involve the provision of attention, affection, or privileges. Sexually exploited children can be defined as children under 18 years of age who experience sexual activities perpetrated against them which involve an element of exchange (money, material goods, protection or shelter, services, etc., or the promises thereof).¹⁰

Sexual abuse of children (CSA) involves forcing or enticing a child or young person to take part in sexual activities, whether or not the child is aware of what is happening. The activities may involve physical contact, including abuse by penetration or non-penetrative acts (such as

¹⁰ Moss, Corinne, et al. "A global systematic scoping review of literature on the sexual exploitation of boys." *Child Abuse & Neglect* 142 (2023): 106244.

masturbation, kissing, rubbing and touching outside clothing). Non-contact activities may also be involved, such as having children view or produce sexual images, watching sexual activities, encouraging them to behave in sexually inappropriate ways, or grooming a child in preparation for abuse, including via the Internet.¹¹

Child sexual abuse includes child sexual exploitation (CSE), a specific form of child sexual abuse (CSA). CSE occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact, it can also occur through the use of technology.¹²

In other countries, particularly in the United Kingdom, numerous definitions of child sexual exploitation (CSE) exist in both research and practice. Recent guidance for childcare professionals defines CSE as “a form of child sexual abuse. It occurs when an individual or group takes advantage of an imbalance of power to coerce, manipulate, or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology”. Across various existing definitions, the primary factor distinguishing CSE from child sexual abuse (CSA) is the concept of an “exchange,” where a child

¹¹ Alexis. Jay, *Interim Report of the Independent Inquiry into Child Sexual Abuse : Presented to Parliament Pursuant to Section 26 of the Inquiries Act 2005* (Controller of Her Majesty’s Stationery Office, 2018).

¹² Jay.

or young person receives something as a result of engaging in sexual activity.¹³

2. Online Sexual Exploitation of Children (OSEC)

One of the most serious forms of abuse online is *online child sexual exploitation* (“online CSE”). Online CSE must be conceptually distinguished from the online sexual exploitation of adults (online SE), which involves different socioeconomic vulnerability factors (e.g., social exclusion, homelessness, immigration), stronger financial fraud elements (e.g., defrauding the elderly of their pensions), and image solicitation that pales in comparison to the adult pornography industry. Online CSE includes activities on the internet (e.g., online pornography) but can also be connected to serious contact offences including rape, kidnapping, trafficking, and murder. Despite its social significance and the multifaceted role of technology in both enabling and constraining the phenomenon, the field of information systems (IS) has so far largely overlooked the study of online CSE.¹⁴

Online streaming of child sexual abuse and exploitation (CSAE) is a horrific crime that causes significant harm to specific groups of children and to the wider society in which it pervades. Aided by technological advancement and supported by the reach of interconnected global networks, it is a crime that targets the most vulnerable members of societies – children. The online streaming of CSAE poses a significant and growing threat, as facilitators, particularly in impoverished communities, gain access to technology that enables them to abuse and exploit children for financial gain, while offenders are provided the opportunity to commit these crimes remotely.¹⁵

¹³ Alderson, Kirsty, et al. “Child sexual exploitation, poly-victimisation and resilience.” *Journal of criminological research, policy and practice* 8.1 (2022): 53-74. <https://doi.org/10.1108/JCRPP-04-2021-0017>.

¹⁴ Egmont Group, “Combatting Online Sexual Abuse and Exploitation Through Financial Intelligence: Public Bulletin,” August 2020, Available: https://egmontgroup.org/wp-content/uploads/2021/09/2020_Public_Bulletin_Combatting_Online_Child_Sexual_Abuse_and_Exploitation_Through_Financial_Intelligence.pdf.

¹⁵ Egmont Group.

3. Financial Sector and Child Sexual Exploitation

In impoverished communities, online streaming offers a financial incentive for criminal networks, introducing a commercial element to child sexual abuse and exploitation (CSAE). The illicit business models associated with this activity, whereby offenders pay to view CSAE material via online streaming, create a money trail in the form of payments and profits. Although the lack of large profits suggests that the wide-scale involvement of organized crime groups (OCGs) may be limited, there is evidence of criminal business structures in developing countries exploiting the commercial opportunities presented by the online streaming of CSAE. Payments related to CSAE are primarily remitted through Money Services Businesses (MSBs) and internet payment providers. However, some payments are observed via banks, noting that modern payment platforms are sometimes linked to traditional bank accounts. Observations also point towards the use of online money transfer platforms, as well as remittance services paid for in cash. There are limited examples of the use of virtual currencies. The project also considered patterns and values of the payments, so FIUs can better identify transactions for online streaming of CSAE, and provide this detail in the full report. Payments are always sent before the material is streamed, reflecting the financial incentive for facilitators. The project identified a large number of jurisdictions identified as receiving or remitting funds for live streaming. Typically, the country where the activity is facilitated is in the developing world, with the activity being purchased or viewed from more developed countries.¹⁶

However, this is not universal, law enforcement has identified that perpetrators sometimes use online money transfer agencies to send money via another jurisdiction. The financial transactions associated with the online streaming of CSAE present opportunities for law enforcement to take operational action against offenders, both those viewing and facilitating the abuse. The information contained in these financial transactions also offers profiling opportunities for Financial Intelligence Units (FIUs) to enhance both strategic and tactical

¹⁶ Egmont Group.

intelligence. Suspicious Activity Reports (SARs) and Suspicious Transaction Reports (STRs) are valuable sources of intelligence on the methods used to remit funds, as well as key identification information about the suspects involved. FIUs have reported that information contained in SARs/STRs enables detailed analysis leading to focused law enforcement activity, including arrests and convictions, as well as other disruptive interventions aimed at preventing CSAE.¹⁷

Method

This study applies a doctrinal research approach with an analytical descriptive research method. As a doctrinal legal research, the data collection technique used in this research is a document study looking for legal materials. The data collection techniques in this paper include secondary data collection using available data, such as public documents and official records, which use pre-existing statistical data.

Result and Discussion

Indonesia is not the only nation confronting the issue of Child Sexual Abuse and Exploitation (CSAE). Many other countries have established legal frameworks and strategies to address this challenge. Indonesia should consider adopting strategies from countries like the United States, and Australia to better tackle sexual exploitation and abuse.

In the UK, the government actively combats online child sexual abuse, with the Home Office overseeing policing policy, which includes the National Crime Agency's Child Exploitation and Online Protection command. The Department for Education manages child services and educational policies, ensuring that schools and colleges protect students from online child sexual abuse. Moreover, the Department for Digital, Culture, Media and Sport spearheads the UK Government's Internet Safety Strategy. In Wales, educational policies are devolved to the Welsh

¹⁷ Egmont Group.

Government, which prioritizes educating children and young people about the dangers of online child sexual abuse.¹⁸

In that country, the inaugural public hearing on the investigation scrutinized how law enforcement agencies handle internet-facilitated child sexual abuse. The Inquiry commissioned three comprehensive reviews of existing research to guide the investigation, examining the behaviours and traits of online perpetrators, the vulnerabilities and characteristics of online victims, and the prevalence of online child sexual abuse. Furthermore, the Inquiry engaged with children and young people to discuss online child sexual abuse and measures for staying safe online. The reviews highlight that online child sexual abuse is a complex and escalating issue, worsened by children spending more time online and accessing the internet at younger ages. Research indicates that adverse childhood experiences, such as physical abuse and exposure to parental conflict, increase children's vulnerability to online victimization. It also notes that the number of young children who are subject to online child sexual abuse is likely to be under-reported.¹⁹

These findings highlight the importance of adopting a multifaceted and comprehensive approach to combating child sexual exploitation and abuse, drawing lessons from the experiences of several countries. From England and Wales, we see the Government Involvement. Centralized efforts led by the Home Office, the National Crime Agency's Child Exploitation and Online Protection command, and the Department for Education ensure a coordinated response. Each department has clear responsibilities, from policing to safeguarding in educational settings. The Department for Digital, Culture, Media and Sport oversees the Internet Safety Strategy, emphasizing the need for ongoing policy development to tackle evolving online threats. In Wales, educational strategies are customized to raise awareness among young people about online risks. The public hearing approach provides transparency and a platform for scrutinizing and evaluating law enforcement's response to online child abuse. Engaging with the affected population, especially children, provides critical insights for

¹⁸ Jay, *Interim Report of the Independent Inquiry into Child Sexual Abuse : Presented to Parliament Pursuant to Section 26 of the Inquiries Act 2005*.

¹⁹ Jay.

policymakers. There's a strong focus on educating children and young people about online safety, highlighting the importance of preventative measures.

What are the implications for Indonesia? Indonesia can benefit from establishing a similarly coordinated approach by designating specific government bodies to lead various aspects of combating online child sexual abuse. Tailoring educational strategies to local contexts, just as Wales has done, could improve the effectiveness of online safety education in Indonesia. Implementing public hearings and research reviews can help maintain transparency and prioritize areas needing immediate action. Engaging directly with young people offers valuable perspectives often missed by policymakers. Early education programs on internet safety, integrated into Indonesia's educational system, can help mitigate risks as children become active online participants at a young age. By adopting these practices, Indonesia could create a more cohesive, informed, and effective strategy to protect children from sexual exploitation and abuse online.

Existing research suggests that some perpetrators of online child sexual abuse only carry out sexual abuse that does not involve physical contact, rather than seeking children for contact sexual abuse. It also indicates that perpetrators of online child sexual abuse increasingly use technology and online tactics so that they can continue offending without detection for as long as possible.²⁰

The Ministry of Justice in England and Wales is responsible for most aspects of the country's criminal justice system including the administration of criminal courts, the commissioning of prison services, rehabilitation and reducing offending, and victim support. The Home Office is responsible for reducing and preventing crime, including policing policy.²¹

Indonesia can draw valuable insights from the experiences of the UK in dealing with online child sexual abuse and exploitation (CSAE). Research indicates that some perpetrators focus on forms of abuse that do not involve physical contact, using technology and online tactics to

²⁰ Jay.

²¹ Jay.

evade detection. This highlights the need for advanced cyber surveillance and technological measures to track and prevent online offences.

For example, the Ministry of Justice in England and Wales oversees various aspects of the criminal justice system, such as managing criminal courts, prison services, rehabilitation, reducing re-offending, and supporting victims. Additionally, the Home Office is responsible for crime reduction and prevention, including policing policies. By integrating similar structures, Indonesia could enhance its criminal justice system to better address CSAE, focusing on effective rehabilitation, stringent cyber-policing, and comprehensive victim support.

In Sweden, the Swedish Financial Coalition against Child Pornography was started in 2008 and changed its name to the Financial Coalition against Commercial Sexual Exploitation of Children in 2014. The child sex trade, or commercial sexual exploitation of children, includes child sexual abuse material (called “child pornography” in the law), sexual exploitation of children sold in Sweden or connection with travel, and trafficking in children for sexual purposes. New ways to sexually exploit children are generated at the same pace as the development of technology and access to the Internet. A great number of cases go unreported and individual seizures conducted by the police can contain millions of pictures and films documenting abuse. Buyers and sellers use different payment methods over the Internet to transfer money between them.²²

The abovementioned passages delve into the offensive realities and technological evolution of online child sexual abuse, detailing the roles of governing bodies in combating this crime. Initial research indicates some abusers restrict their actions to non-physical online abuse. The perpetrators utilize technology to evade detection and perpetuate their offences. Administers criminal courts and oversees prison services, rehabilitation, reducing re-offending, and victim support. Focuses on

²² The Swedish Financial Coalition against Child Pornography, “Summary of the Swedish Entry to European Crime Prevention Award 2015: Financial Coalition against Commercial Sexual Exploitation of Children (Child Pornography),” European Crime Prevention Network, 2015, https://eucpn.org/sites/default/files/document/files/summary_of_the_swedish_entry_to_european_crime_prevention_award_2015.pdf.

crime reduction and prevention, including policing policy. Perpetrators leverage cutting-edge technology to remain hidden, indicating a need for robust digital tracking and law enforcement capabilities. Accordingly, a Multi-faceted Approach Needed Effective combating of these crimes requires coordination across legal, technological, and financial sectors. The above approach illustrates proactive measures by focusing on financial transactions to combat commercial sexual exploitation. This finding underscores the evolving nature of online child sexual abuse and the need for multi-dimensional strategies involving technology, finance, and coordinated legal responses to address and mitigate these crimes.

The Financial Coalition against Commercial Sexual Exploitation of Children demonstrates how leveraging partnerships across various sectors can effectively combat heinous crimes. By integrating the resources and expertise of governmental authorities, private entities, and NGOs, this Coalition creates a robust defence against the exploitation of children. The strategy of intercepting and blocking payments before they are completed is particularly commendable, as it focuses on prevention without compromising individual privacy. Their collaboration with ECPAT Sweden and other public authorities to reveal and obstruct new illicit payment routes shows a proactive and dynamic approach to this issue. The notable decline in the use of payment cards and the reduction of websites selling child sexual abuse material are significant indicators of success, highlighting the critical role of the financial services sector in detecting patterns and developing solutions. The Coalition's work is a powerful reminder of the impact sustained and collaborative efforts can have in protecting vulnerable populations and disrupting criminal networks.²³

This Financial Trend Analysis (FTA) provides threat pattern and trend information on the use of convertible virtual currency (CVC) associated with online child sexual exploitation (OCSE) and human trafficking based on Bank Secrecy Act (BSA) data filed with FinCEN between January 2020 and December 2021 (the "review period"). FinCEN's analysis began with a focus on human trafficking-related activity associated with CVC. However, the review determined that the majority of BSA reports identifying CVC related to human trafficking

²³ The Swedish Financial Coalition against Child Pornography.

also identified activity associated with OCSE and child sexual abuse material (CSAM). Perpetrators of OCSE exploit children in the United States and around the world for financial gain, while bad actors engaged in human trafficking similarly prey on and victimize both children and adults as part of their illicit activities.²⁴

The total number of OCSE- and human trafficking-related BSA reports involving CVC rose significantly, from 336 in 2020 to 1,975 in 2021. In 2020, these BSA reports accounted for only six percent of all human trafficking-related BSA reports, but by 2021, this figure had surged to 29 percent. Throughout the review period, the total value of reported OCSE- and human trafficking-related suspicious activity involving CVC increased from \$133 million in 2020 to \$278 million in 2021. However, this rise was notably influenced by a single high-value BSA report received in June 2021.²⁵

Bitcoin used for OCSE- and human trafficking-related payments: Of the 2,311 BSA reports received during the review period, 2,157 reports specifically referenced Bitcoin as the primary CVC used for purported OCSE- and human trafficking-related activity. The remaining reports did not specify the type of CVC used. From this dataset, FinCEN identified over 1,800 unique Bitcoin wallet addresses related to suspected OCSE and human trafficking offences. FinCEN also identified several money laundering typologies involving CVC, OCSE, and human trafficking. These include the use of darknet marketplaces that distribute CSAM, peer-to-peer (P2P) exchanges, CVC mixers, and CVC kiosks.²⁶

By December 2021, bitcoin's market cap reached \$932 billion, accounting for approximately 39 percent of the total CVC market. Child sexual exploitation involves victimizing a minor for sexual gratification or personal or financial gain. This exploitation can include the possession, receipt, distribution, transportation, advertisement, or production of child sexual abuse material (CSAM), as well as travelling

²⁴ Financial Crimes Enforcement Network, "Financial Trend Analysis Use of Convertible Virtual Currency for Suspected Online Child Sexual Exploitation and Human Trafficking: Threat Pattern & Trend Information," February 2024, <https://www.state.gov/wp-content/uploads/2022/10/20221020-2022-TIP-Report.pdf>.

²⁵ Financial Crimes Enforcement Network.

²⁶ Financial Crimes Enforcement Network.

across state or international borders to engage in illicit sexual conduct with a minor under the age of 18. Other acts of criminal sexual abuse involving children under 18 are also included. Online Child Sexual Exploitation (OCSE) refers to the use of the internet to: (1) engage or attempt to engage in child sexual exploitation; (2) persuade, induce, entice, or coerce a minor to engage in any illegal sexual activity; or (3) commit offences involving child sexual abuse material.²⁷

Banks, by facilitating the flow of illicit funds that enable this abuse, also have a responsibility to detect these crimes and help stop predators.. When offenders pay for illegal content, they leave behind a financial footprint. Banks can analyze this data to identify patterns related to online CSE, enabling them to detect and prevent future offences. However, they must know what red flags to look for. There are an estimated half a million predators active online each day in the US alone according to the FBI. The increasing internet use for schooling and entertainment puts children at an ever-greater risk. We know that consumers of online CSE tend to hide their identity with a VPN and other anonymization tools. We also know they make use of pre-paid cards and gift cards to make payments to the facilitators, which are then often converted into cryptocurrencies.²⁸

Predators often make multiple payments in a single day or over consecutive days, sometimes weeks apart, using Western Union, PayPal, and other third-party payment methods; services that omit traditional identification checks. On their own, these behaviours may not raise alarms. For instance, using a VPN isn't inherently suspicious. However, when we map these behaviours against known online CSE personas and cross-reference financial data with online activities and sex offender registries, seemingly innocent transactions can reveal a much darker pattern. By gaining a contextual understanding of predator behaviours, we can uncover where they hide. Banks can use financial data – the digital footprints of online CSE offenders – to uncover the tracks of people who are abusing, grooming, and victimizing children through their activities

²⁷ Financial Crimes Enforcement Network.

²⁸ Finextra, “Like Meta, Banks Vae a Responsibility to Tackle Onlie Child Sexual Exploitation,” Finextra, 20 March 2024,” n.d., <https://www.finextra.com/blogposting/25932/like-meta-banks-have-a-responsibility-to-tackle-online-child-sexual-exploitation>.

on social media and the wider internet. Banks can lead by example by moving away from outdated and rigid responses toward a more proactive and effective approach.²⁹

Persona-based typologies categorize and help identify different individuals, and organizations, and their characteristics in relation to specific types of financial crime. By using this methodology, banks can recognize common payment behaviours, or ‘red flags,’ associated with online CSE. This approach enables financial institutions to detect, investigate, and report potential child exploitation on the Internet more effectively. Banks can either analyze these crimes holistically or focus on specific personas and red flags linked to online CSE.³⁰

Online CSE criminals are increasingly utilizing payment systems, as evidenced by money flows either between an offender and a victim (in cases of sextortion or self-production) or between an offender and a facilitator (such as CSE livestreaming or travelling to offend). These transactions are at the core of CSE and can be vital in detecting and stopping these crimes. Banks have a legal obligation to detect, investigate and report financial crimes, including online CSE. They can work together, share information, and educate their anti-financial crimes teams. Persona-based typologies offer a promising step forward. As children spend more time online for education, entertainment, and social interaction, they become more vulnerable to exploitation. The fight against online CSE requires a comprehensive approach that addresses both traditional types of exploitation and emerging trends, such as exploitation on social media platforms. However, banks can and must do more.³¹

Indonesia can learn valuable lessons from Sweden’s approach to combating commercial sexual exploitation of children through the Financial Coalition against Commercial Sexual Exploitation of Children. These lessons include the importance of collaborative efforts among government agencies, financial institutions, law enforcement, and NGOs to create a unified front against CSEC. targeting financial transactions to disrupt the financial flows that facilitate the child sex

²⁹ Finextra.

³⁰ Finextra.

³¹ Finextra.

trade, adapting to technological changes by investing in cyber-surveillance technologies, and enacting legal reforms to align with international best practices are essential steps. Additionally, raising awareness, providing accessible reporting mechanisms, implementing robust data management for digital evidence, and establishing victim support services are crucial. By adopting these strategies, Indonesia can enhance its efforts to combat CSEC and provide a safer environment for its younger population.

Indonesia needs also to learn from the Australian experience in tackling the same problem. As in other countries, in Australia, financial service providers play an important role in combating child sexual exploitation for financial gain. Through the development of profiling and transaction monitoring programs, financial service providers can target, identify and stop financial transactions associated with the sexual exploitation of children. AUSTRAC recognizes the exploitation of children transcends borders and has partnered with key government agencies and not-for-profit organizations to assist in the fight against child sexual exploitation. The Internet and related technologies are increasingly becoming a prominent means by which children are exploited for sexual purposes. The Internet provides users with anonymity and accessibility, allowing online predators to access live-distance child abuse material on a global scale. The impact of child sexual exploitation is far-reaching and the nature of this type of offending requires a joint approach by government, industry and the wider international community to identify and prosecute offenders who exploit children for financial gain.³²

An analysis of current and previous investigations have identified a number of specific financial and environmental indicators of child sexual exploitation involving Australia-based entities and offshore facilitators. These indicators aim to assist the financial industry in identifying and reporting transactions suspected to be related to the purchase of child exploitation material. Previous information sharing regarding the type of transactions, amounts and money movements has enabled the financial industry to become more aware of instances where

³² Fintel Alliance, "Combating the Sexual Exploitation of Children for Financial Gain Activity Indicators," November 2019.

customers may be purchasing child exploitation material and report to relevant authorities. Most offenders use multiple financial institutions and remittance service providers to send payments to offshore facilitators, attempting to avoid raising suspicion. If an offender's account is closed due to suspicious activity, they often move to another service provider to continue their illicit transactions.³³

Australia's approach to combating child sexual exploitation for financial gain offers valuable lessons for Indonesia. Key strategies include implementing financial surveillance programs, fostering collaboration among government agencies, financial institutions, and non-profit organizations, and leveraging technology to monitor online and financial activities. Additionally, prioritizing international cooperation, conducting awareness and training programs, strengthening legislative measures, establishing robust reporting mechanisms, and allocating resources effectively are essential steps. By adopting these strategies, Indonesia can enhance its capacity to combat child sexual exploitation financed through financial transactions and create a safer environment for its children.

In the context of the Indonesian current legal framework, Law No. 23 of 2002 on Child Protection, specifically Article 1 number 15, defines special protection as measures afforded to children in a variety of vulnerable circumstances. These include children in emergencies, those in conflict with the law, children from minority and isolated groups, and those subjected to economic and/or sexual exploitation. The definition also encompasses trafficked children, victims of substance abuse, and those who have experienced abduction, sale, or trade. Additionally, it covers children victimized by physical and/or mental violence, children with disabilities, and those suffering from mistreatment and neglect.

Furthermore, Article 13 of the same law mandates that every child under the guardianship of parents, guardians, or other caregivers has the right to be protected from discrimination, economic and sexual exploitation, neglect, cruelty, violence, abuse, injustice, and other forms of maltreatment. Regarding special protection, Law No. 23 of 2002, which was amended by Law No. 35 of 2014, specifies in Article 59 that both the national and regional governments, along with other state

³³ Fintel Alliance.

institutions, bear the obligation and responsibility to provide special protection to children. This protection encompasses, among others, children exploited economically and/or sexually and those who are victims of sexual crimes.

In Article 66, as amended by Law No. 35 of 2014, the law outlines that special protection for children subjected to economic and/or sexual exploitation is to be implemented through several mechanisms. These include the dissemination and socialization of relevant regulations, monitoring, reporting, and the imposition of sanctions, as well as the involvement of various entities such as corporations, labour unions, non-governmental organizations, and the community at large to eradicate the economic and/or sexual exploitation of children.

The articles mentioned above, along with three additional provisions, represent the legal frameworks that underscores Indonesia's commitment to protecting children from economic and sexual exploitation. Article 76I of Law No. 23 of 2002, amended by Law No. 35 of 2014, establishes a strong stance against various forms of child exploitation. The article comprehensively covers different roles and actions that can contribute to exploitation, making it extensive in scope. This indicates a proactive effort by the law to address both direct and indirect forms of exploitation, ensuring a wide net for legal accountability. Article 77 expands the protective measures to include discrimination and negligence. The punitive measures—up to five years imprisonment and/or a Rp 100,000,000.00 fine—reflect the severity attributed to these offences. The emphasis on material and moral damages, as well as physical, mental, and social distress, signifies an understanding of the multifaceted nature of harm that can befall children. Article 2 of Law No. 21 of 2007 focuses on the broader issue of human trafficking and exploitation, not limited to children but potentially inclusive of them given the nature of the crimes. The prescribed penalties—ranging from three to fifteen years of imprisonment and fines from IDR 120,000,000.00 to IDR 600,000,000.00—indicate the seriousness with which these crimes are viewed. The articles outline various methods by which trafficking and exploitation are conducted, covering a wide range of possible coercive means. This illustrates a thorough understanding of the complexities of human trafficking.

These legislations collectively serve as a robust legal framework to deter crimes against children and protect them from exploitation. The specified penalties emphasize the severe consequences for offenders, aiming to act as a deterrent. Moreover, the inclusion of both physical and mental harm ensures a comprehensive understanding of the impact of these crimes on children.

Nonetheless, effective enforcement of these laws is crucial. Legislation alone cannot mitigate these issues; robust implementation, monitoring, and support systems are necessary to protect children and support victims in reclaiming their lives. Ensuring that law enforcement agencies, the judiciary, and other stakeholders are adequately trained and resourced to uphold these laws is vital for their success.

The provided text outlines specific articles from Law No. 21 Year 2007 and Law No. 12 Year 2022 related to child adoption and human trafficking, particularly focusing on their exploitation and sexual violence aspects. Article 5 of Law No. 21 Year 2007 criminalizes child adoption involving promises or gifts if the intent is exploitation. It establishes clear penalties: imprisonment ranging from 3 to 15 years and fines between Rp120,000,000.00 and Rp600,000,000.00. The severe penalties highlight the legal system's stance on protecting children from exploitation through deceptive adoption practices. Article 6 of Law No. 21 of 2007 addresses the transportation of children for exploitation, whether domestically or internationally, with penalties similar to those in Article 5. This article emphasizes the importance of combatting child trafficking, asserting that both exploitative adoption intentions and the transportation of children for exploitation are equally reprehensible under the law. Additionally, Article 12 of Law No. 21 of 2007 addresses the exploitation of human trafficking victims in various forms, including sexual activities, forced labour, and financial gain from trafficking. It emphasizes severe punishment for any exploitation linked to human trafficking, connecting it to Articles 2, 3, 4, 5, and 6 of Law No. 12 Year 2022 concerning Sexual Violence. Article 4 of Law No. 12 Year 2022 on Sexual Offences comprehensively defines the different forms of sexual violence, ranging from non-physical harassment to electronic-based sexual violence. This law categorizes the various forms of sexual violence and underscores the seriousness of each type, providing a framework for applying appropriate penalties.

The stringent penalties and broad definitions indicate a robust legal framework aimed at preventing exploitation and trafficking, especially concerning children. By clearly defining what constitutes sexual violence and setting hefty penalties, the laws reflect a proactive stance against human trafficking and exploitation. The emphasis on punishment, rehabilitation, and deterrence seeks to create a safer environment for vulnerable groups, particularly children. Overall, these articles collectively aim to deter exploitative practices through stringent legal consequences, highlighting the importance of safeguarding children and trafficking victims from various forms of abuse and exploitation.

Regarding Prosecution, Article 56 (4) of Law No. 12 of 2022 states that in criminal cases involving victims who have been exploited and experienced sexual violence through electronic media or related to sexuality, the public prosecutor shall refrain from including or reproducing images, illustrations, and/or photos of the victims or data containing the victims, or showing reproductive organs, activities, and/or sexual objects in the indictment.

Despite the fact that Law Number 12 of 2022 on Sexual Violence Crimes has been enacted, Indonesia still lacks adequate regulations on Online Child Sexual Exploitation. The electronic-based sexual violence regulated in this law must be amended promptly to be more 'up to date'. Our criticism of the absence of this punitive framework is to amend Indonesian laws to ensure that the law explicitly criminalizes live streaming of child sexual abuse content, online sexual extortion, online grooming of children for sexual purposes, and intentionally attending pornographic shows involving children.

In addition to Law Number 12 of 2022, Indonesia can also strengthen the legal framework in enforcing Online Child Sexual Exploitation through the enhancement of primary regulatory bodies such as Bank Indonesia and the Financial Services Authority (OJK). These institutions are responsible for developing and enforcing regulations that govern the fintech industry, addressing issues such as payment systems, peer-to-peer lending, and anti-money laundering

(AML) and countering the financing of terrorism (CFT) measures.³⁴ Although OJK and Bank Indonesia both have laws that essentially control consumer protection, these laws are regrettably restricted still limited to the know-your-customer principle and suspicious transaction monitoring principles. The enforcement of suspicious transactions pertaining to sexual offenses, especially those against minors, is not specifically covered by any rules, nevertheless. Strengthening financial service institutions becomes crucial as they are the primary gateway for identifying the potential for child sexual abuse, if we take a cue from the above-mentioned methods in England, Sweden, and Australia.

There are seven court decisions in Indonesia regarding child sexual exploitation, one of which is the Decision of the Kotabumi District Court Number 29/Pid.Sus/2014/PN.KB. On June 26, 2014 declared that the defendant Rian Purnama had been proven guilty of committing the crime of child sexual exploitation to benefit themselves or others. This court Imposes a sentence on the defendant of 3 (three) years imprisonment and a fine of Rp 60,000,000 (sixty million rupiah) with the provision that if the fine is not paid by the defendant, it will be replaced with imprisonment for 3 (three) months.

Is there any experience in Indonesia related to the financial sector in addressing the exploitation of children? The number of victims of human trafficking and migrant smuggling continues to increase significantly. Estimates of the proceeds from human trafficking have increased from USD 32 billion to over USD 150 billion since the Financial Action Task Force (FATF) produced a comprehensive report on money laundering in 2011. Since then, there has also been a better understanding of how and where human trafficking occurs, including the increasing prevalence of individuals trafficked within the same country or region. The report released by FATF, together with the Asia Pacific Group on Money Laundering (*APG*), aims to raise awareness of the types of financial information that can be used to identify human trafficking for sexual exploitation or forced labour, and to raise awareness of the potential for profit from trafficking in human organs. The report

³⁴ Uni Tsulasi Putri, "Indonesian Legal Framework of the Misuses of Financial Technology as A Means of Child Sexual Exploitation Amidst the Innovation of Cryptocurrency," 2024, 66–73, https://doi.org/10.2991/978-2-38476-325-2_8.

also highlights the potential link between human trafficking and terrorist financing. Because human trafficking can occur in any country, it is important for countries to assess the risks of human trafficking and money laundering from this criminal activity, and to share this information with relevant stakeholders.³⁵

The above finding discusses the intersection of financial regulation and human trafficking, with a focus on Indonesia's experience and broader international efforts. While the text does not provide direct specifics about Indonesia's actions, it implies that the country is part of a wider initiative led by international bodies like the Financial Action Task Force (FATF) and the Asia Pacific Group on Money Laundering (APG). Human trafficking and migrant smuggling are highlighted as growing concerns within Indonesia, consistent with global trends. Financial institutions and regulatory bodies can play a pivotal role in identifying and disrupting financial flows associated with human trafficking. The increase in estimated proceeds from human trafficking (from USD 32 billion to over USD 150 billion) underscores the scale and profitability of this crime, necessitating comprehensive financial scrutiny.

The FATF/APG report suggests leveraging financial data to spot illicit activities, emphasizing identifying human trafficking for sexual exploitation, forced labour, and even organ trafficking. It highlights the necessity of international cooperation in understanding and combating human trafficking. Countries are encouraged to assess their risks and share information, facilitating cross-border collaboration to tackle money laundering and trafficking. This collaborative approach helps in building a detailed picture of illicit financial flows, enhancing the ability to prevent and prosecute such crimes. Identifying human trafficking through financial transactions can be complex, as traffickers often employ sophisticated methods to conceal their profits.

Financial institutions need proper training and resources to recognize suspicious activities related to human trafficking. Regulatory frameworks must be robust and adaptive to evolving methods used by traffickers. While the data does not delve into specific measures taken by Indonesia, it highlights the critical need for the financial sector to be

³⁵ Financial Action Task Force (FATF) and the Asia Pacific Group on Money Laundering, "Financial Flows from Human Trafficking," 2018, www.fatf-gafi.org.

vigilant and proactive in identifying and addressing human trafficking. The increased awareness and understanding provided by international reports are vital, but actionable steps at the national level, including in Indonesia, are necessary to curtail this grievous issue. The financial sector must continue to enhance its monitoring capabilities, collaborate internationally, and support law enforcement to make a significant impact against human trafficking.

Conclusion

The issue of child sexual exploitation and abuse (CSEA), both globally and in Indonesia, is alarming and escalating. The problem is compounded by the rising trend of online CSEA, where technology facilitates new methods for perpetrators to exploit children. Offenders increasingly use virtual assets and other financial tools to disguise and support their activities poses a significant challenge. In Indonesia, despite having numerous laws targeting various forms of sexual exploitation and institutions like the police, prosecutors, and courts for enforcement, the legal framework is still inadequate to comprehensively tackle CSEA. Moreover, institutions proficient in combating financial crimes, such as *PPATK* (Indonesian Financial Transaction Reports and Analysis Centre) and *OJK* (Financial Services Authority), exist but are not sufficiently integrated or mobilized to address the financial means of CSEA. The lack of a dedicated legal framework specifically addressing the fusion of CSEA and financial mechanisms is a critical gap. Additionally, the absence of institutions or coordinated efforts focused on this intersection further exacerbates the problem. This highlights a critical need for improved legislation, specialized institutions, and concerted, multi-agency collaboration to effectively combat CSEA involving financial transactions. Indonesia faces a profound challenge in tackling child sexual exploitation and abuse, particularly as the exploitation moves online and integrates complex financial methods. While existing laws and institutions address various aspects of sexual exploitation and financial crimes, there remains a clear gap in tackling the intersection of CSEA and financial mechanisms.. This underscores the urgent need for enhanced legal frameworks, specialized institutions, and better coordination to effectively confront this evolving threat.

To address the alarming issue of child sexual exploitation and abuse (CSEA) in Indonesia, particularly as it moves online and integrates complex financial methods, a multifaceted and comprehensive approach is required. Drawing from the experiences of other countries, Indonesia can adopt several strategies to effectively combat this evolving threat. These strategies include implementing advanced profiling and transaction monitoring systems in financial institutions and utilizing machine learning and AI to detect patterns and red flags associated with CSEA-related financial transactions. Providing extensive training to financial institution staff and establishing strong partnerships between government agencies, financial institutions, and non-profit organizations are also crucial steps. Developing secure platforms for real-time information sharing, creating a specialized task force involving various stakeholders, and investing in advanced cybersecurity technologies should be priorities. Collaboration with domestic and international tech firms and implementing sophisticated cyber-surveillance tools are equally important. Additionally, strategies targeting non-physical contact forms of abuse, establishing frameworks for cooperation with international agencies, and conducting joint operations and investigations with international partners are essential. Promoting the exchange of information and best practices and strengthening laws to address child exploitation are also critical measures. Legislation mandating financial institutions to report suspicious transactions related to CSEA must be introduced and strictly enforced, with compliance monitoring in place. Policymakers should work to draft and pass comprehensive legislation, integrating institutions like PPATK and OJK into the national strategy. Fostering partnerships between the government, financial sector, tech companies, and non-profits will further bolster efforts to combat CSEA. By integrating these strategies, Indonesia can significantly enhance its capacity to fight against child sexual exploitation financed through financial transactions and create a safer environment for its children.

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