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**Abstract:** Trafficking, forced labour and 'slavery' (TFLS) have become a central cause for our time, but anti-TFLS efforts have also come under forceful criticism. Amidst these ongoing debates, we observe that TFLS is currently being reframed as a problem of and for development. We consider the implications of this reframing by first reviewing the tangled history of abolitionism, colonialism and development, linking this to critical understandings of development more broadly. We then utilise Critical Discourse Analysis (CDA) to study the methodological assumptions and discursive framing of (anti-)TFLS in two paradigmatic texts. In doing so, we trace an important discursive shift to anti-TFLS as development in the moment it unfolds. Troubling the narrative of anti-TFLS as development, we conclude that while it promises to amend the criminal justice approach, it nevertheless perpetuates a global politics of rescue.

**Keywords:** anti-trafficking; human trafficking; forced labour; modern slavery; development geography; critical discourse analysis

## Introduction

Over the last two decades, the issues of trafficking, forced labour and 'modern slavery' (TFLS) have been firmly planted on the agenda of governments, multinational institutions, NGOs and businesses. The growth of campaigns, media, programs and policies to counter TFLS appears to know no limit. These efforts are diverse, but a dominant criminal justice paradigm has been discerned. The efforts have also been subject to a range of critiques.

With TFLS included in the United Nations Sustainable Development Goals (SDGs) via Target 8.7 on decent work<sup>1</sup>, we argue that a significant shift is underway, with TFLS increasingly framed as a problem of and for development. While such a shift arguably responds to some of the critiques of efforts to combat TFLS (or 'anti-TFLS'), there is a need to interrogate this new framing. This article contributes to such a task by seeking to trace this discursive shift as it unfolds. We first remind readers of historical abolitionism's troubled history in relation to colonialism and development, and highlight the need for critical understandings of development. We then conduct a discourse analysis of two paradigmatic texts on TFLS to examine whether and how 'development' is framed in relation to contemporary abolitionism. We conclude that anti-TFLS in its development guise retains problematic assumptions, with implications for policy and practice. Critical scrutiny, as well as alternative ways of responding to unfreedom and exploitation, remain vitally important.

Below, we situate our analysis by outlining critiques of anti-TFLS in the 21<sup>st</sup> century. We then consider the ways that arguments against slavery and forced labour were articulated historically in the context of colonialism, decolonisation and development, and how this can be linked to critical understandings of development more broadly. Following this, we

present our methodology: a discourse analysis of two emblematic texts, the Global Slavery Index (GSI) produced by the Walk Free Foundation (2014a) and the Trafficking in Persons (TiP) report produced by the US Department of State (2015, hereafter TiP 2015). In presenting our findings, we interrogate the methodological assumptions and discursive framings underpinning these texts. We show that: quantification takes the form of rankings; certain forms of knowledge are valorised; representations of ‘victims’ and ‘abolitionists’ are (still) racialized; questions of development are reduced to ‘culture’; and the problematic ‘material connections’ (potentially) raised by TFLS – such as supply chains and migration – are managed. Our conclusion is that anti-TFLS as development perpetuates a damaging global politics of rescue, and inhibits alternative, progressive framings and responses.

### **Anti-TFLS: The Criminal Justice Framework and Beyond**

The current intensity of commitment to an anti-TFLS agenda emerged around the turn of the millennium, signalled by: The International Labour Organisation’s (ILO’s) 1998 Declaration on Fundamental Principles and Rights at Work, the United Nations (UN) Trafficking Protocol of 2000<sup>ii</sup>, the US Trafficking Victims Protection Act (USTVPA) of 2000, and the publication of *Disposable People: New Slavery in the Global Economy* (Bales, 1999). Since then: a range of national and local laws, policies, action plans and task forces have been implemented; new anti-TFLS organisations have been founded; existing government agencies, service organizations, advocacy and organizing groups (including major International NGOs) worldwide have reoriented and/or rebranded their work as anti-TFLS<sup>iii</sup>; and anti-TFLS has taken a central place within Corporate Social Responsibility, supply chain management and compliance agendas (in part due to fears of liability).

In using the term 'TFLS,' we neither propose nor advocate it as a catch-all category capturing the realities of unfreedom on the ground. We recognise, for example, that precise definitions of trafficking, forced labour and slavery are of enormous concern from a legal perspective (Piper et. al. 2015). Rather, we speak of (anti-)TFLS as policy field – in as much as policy, private (corporate or philanthropic) initiatives and advocacy increasingly address these issues together and/or treat them as a singular phenomenon. It is not our task here to weigh in on debates about proper terminology; rather, our focus is on understanding the discursive construction of these categories, a process which extends well beyond the juridical sphere.

We start from the following observations: definitions of each category are contested and dynamic; categories have frequently been articulated with reference to each other; and different terms are ever more conflated. Today, trafficking and forced labour are not only linked to slavery; for many, they *are* modern-day slavery.<sup>iv</sup> The terms are often used interchangeably, as they are in the TIP report, while the GSI's definition of modern slavery 'covers' a range of legal concepts including trafficking and forced labor (Walk Free Foundation 2014a:114). Policies framed as 'anti-trafficking' may also be referred to by observers as 'anti-slavery' - and indeed 'slavery' appears to be eclipsing 'trafficking' as the hegemonic term (see Chuang, 2014). Fundamentally, what these categories (and their collective framing) have in common is the designation of certain conditions and relations as universally intolerable, thereby demarcating them as sites for urgent intervention.

As the field of anti-TFLS policy, practice and scholarship has developed, a range of critiques have been made. First, the association (and often conflation) between trafficking and 'sex slavery' was reinforced through the UN Trafficking Protocol. The emphasis on prostitution,

which persists even though there is now greater attention to other forms of work within anti-TFLS, has been critiqued for (largely) precluding questions of sex workers' rights (Gulati 2012; Ditmore 2003; Doezema 2010; Kempadoo 2007) and thus harming sex workers, even those considered 'victims' of, or vulnerable to, trafficking (Dottridge 2007; Andrijasevic and Mai 2016). More broadly, the Protocol established the '3 Ps' framework of prosecution, protection, and prevention, which has in practice constituted a criminal justice framework concentrating on prosecution and largely failing to address the needs and rights of potential and actual 'victims' (Bernstein 2010; Chuang 2014). Concerns around trafficking have also been intertwined with debates around immigration, such that the distinction between 'victims' and 'illegal' immigrants has arguably done more to constrain the rights and freedoms of migrants than it has done to prevent abuses or protect 'victims' (Anderson, 2008; Dwyer et. al. 2016; Lewis et. al. 2015; LeBaron et. al. 2018; Sharma 2017). Further, as Lerche has argued, the effects of distinguishing between TFLS and 'lesser exploitation' of workers can be similarly harmful (2007). Crucially, non-state actors such as NGOs and celebrities have played central roles in establishing and carrying out the dominant criminal justice approach (Musto 2016; Haynes 2014) and the expansion of this framework into what Kempadoo terms a 'politics of rescue' (Kempadoo 2016a).

Bales' work, insisting on the distinctiveness of 'slavery' and defining 'new slavery' in terms of exploitation, violence (or its threat), and loss of free will (1999), has been influential across a range of disciplines and in the popular press (for example: van den Anker 2004; Manzo 2005; Craig 2015; Kara 2009; Batstone 2007). Even some aligned with this 'new slavery' school, however, have raised concerns that the renaissance of anti-trafficking efforts has 'done little to reduce the incidence or harm of the phenomenon' (Brysk and

Choi-Fitzpatrick 2012:2). Within and beyond this school, many have argued that strict binaries are unhelpful and that slavery should be conceived of as one end of a continuum (e.g., Skrivankova 2010) or have called for alternative labour or human rights paradigms (Shamir 2012; Brysk and Choi-Fitzpatrick 2012). Some critiques, however, express more fundamental concerns with the problematic categories of 'free labour' vs. TFLS (e.g., Brace, 2010; O'Connell Davidson, 2015; McGrath and Rogaly, 2014). Our argument below regarding the emergent discourse of anti-TFLS as development seeks to build on and extend this critical body of work.

Thus while we endorse Strauss' call for 'the necessity of research agenda that seeks to understand the role of space and place in shaping the continuum of exploitation and unfreedom' (2012:139), we would urge geographers to be mindful of the body of critical literature noted above. It is also important for critical scholars of development to engage with the topic, given that TFLS is moving into centre stage within the development industry: as an explicit target of development through the UN SDGs, and with the ILO-led Alliance 8.7 seeking to generate visibility, attract resources and create a coordinated agenda around the target. Significantly, Bales has recently posited 'a virtuous circle of sustainable development and environmental stewardship' as the solution to 'the vicious cycle of slavery and environmental destruction' (2016:67)<sup>v</sup>. While development studies and practice has sometimes covered the issue(s) of TFLS, this has typically been only as a subset of broader topics such as labour standards, migration, and poverty. LeBaron argues that 'the widespread presence of forced labour' has 'been under-investigated by scholars of ... development' (2016:385), while Barrientos, et. al. state that 'the persistence of unfree labour' is 'overlooked' in 'development discourse' (2013:4)<sup>vi</sup>. Critical and geographical

perspectives are therefore necessary in order to subject shifting anti-TFLS policy and practice to analytical scrutiny.

The discursive links being forged between development on the one hand and (anti-)TFLS on the other are, then, important to uncover as they are likely to shape the contours through which policy and practice on TFLS evolve in the era of SDGs. The question is whether and how a development paradigm might modify the currently dominant criminal justice framework. Enthusiasm for the inclusion of target 8.7, and by extension for a 'development paradigm', appears to be based on the hope for greater balance among the '3 Ps' with more attention given to education, anti-discrimination, migrants' rights and/or labour rights. Yet this arguably rests upon an unproblematised understanding of development as 'good change' (Chambers 1997). We therefore note that while the framing of (anti-)TFLS as a problem of and for development is a shift from the dominant criminal justice framework that has emerged in the 21<sup>st</sup> century, it is not wholly novel from an historical perspective. Development, entangled with colonialism and its legacies, has been proposed as a solution to slavery and forced labour before.

### **Situating Anti-TFLS as Development**

Colonialism depended not only on chattel slavery produced through the Transatlantic Slave Trade but a range of exploitative labour relations including bondage, indenture, punishment for exiting labour contracts, and other forms of labour characterised by compulsion, coercion and/or violence. This imposition was integral to the 'civilising mission' of colonialism (Conklin 1997; Allina 2012a; Fischer-Tiné and Mann 2004). Thus, as early as 1944, scholars have pointed out that unfree labour, including slavery, 'developed' the Global North (Williams 1944; see also Blackburn 1997; Cooke 2003; Beckert and Rockman

2016), enriching the colonising nations and paving the way for capitalist growth. To posit development as the solution to TFLS fails to acknowledge this foundational connection.

As anti-slavery sentiment began to grow in the 18<sup>th</sup> century, however, the relationship became more complex. Colonial and imperial relations were increasingly justified *in the name of fighting slavery*. Not coincidentally, many prominent advocates against slavery had backgrounds as colonial administrators (e.g. Gabriel Louis Angoulvant; Frederick Lugard) or missionaries (e.g., John Harris). Notably in relation to our argument below, they also figured prominently in the birth of the development industry and development studies (Kothari, 2005). Colonial logic dictated that the forms of slavery of most concern were those linked to ‘tradition.’ At the same time, administrators on the ground often considered it impractical to abolish these ‘traditional’ relations (see Quirk, 2006; Huzzey, 2012).

By the early 20<sup>th</sup>-century, there was broad international concern for varied forms of forced labour,<sup>vii</sup> not limited to slavery per se, while at the very same time ‘colonial policy became more intensively geared towards the exploitation of the colonies’ (Maul, 2007:479).

Consequently, forced labour was excluded from the UN’s 1926 Convention on Slavery. It was instead addressed through the ILO’s 1930 Forced Labour Convention (Kott, 2012: 323)<sup>viii</sup> but this was largely limited to suppressing forced labour for *private* purposes. Excluded from the definition were military service, normal civic obligations, work for a public authority imposed ‘as a consequence of conviction in a court of law,’ work exacted in ‘cases of emergency,’ and ‘minor communal services.’ It was also allowed as an ‘exceptional measure’ during a ‘transition period.’ Colonies were treated differently than member states, reproducing ‘the separation between the world of citizens and the world of subjects’ (Maul, 2007:482), in a continuation of 19<sup>th</sup> century ‘standards of civilisation’ used to determine the

right to participate in international society (Gong 2002; Bowden 2004). As we demonstrate below, this distinction persists today.

Colonial powers continued to employ coercive labour relations, justified by a logic of 'using forced labour to introduce "free labour"' among the 'native' population (Brown and van der Linden, 2010:5) As Lester argues, a core humanitarian logic animated early British abolitionism: concern for 'distant others' motivated in part by a recognition of 'material connections' which link 'their' sufferings with 'our' privileges. But these concerns were geared towards 'the revision of colonized subjectivities' (2002:285) rather than a revision of the colonizers' worldview: they were effectively channeled towards reforms which allowed the overall colonial project to maintain its legitimacy (see also Ribi Forclaz 2015).

The period following World War II, when the development project *as such* rose to prominence and the Cold War was inaugurated, was an important moment of change. WWII created an association between forced labour and fascism due to practices perpetrated by imperial Japan and especially Nazi Germany. At the same time, Western governments and organized labour in the US objected to Soviet forced labour camps (Stalinist Gulags) while the USSR sought to point out the variety of forced labour practices which continued around the world. The ILO tended to underplay forced labour perpetrated by the colonial powers compared to that of socialist and communist countries<sup>ix</sup> (Maul, 2007).

Important discursive shifts were also taking place in this period. Colonial powers no longer justified forced labour 'by the cultural and racial superiority of the colonizers' but rather by the 'position of advanced knowledge held by benevolent technocratic modernizers' (Maul 2007:484). This aligned with a policy of 'welfare colonialism' which involved 'promises of

sweeping social and economic development' (Maul 2007:484). The end of WWII was to herald a significant period of decolonisation which destabilised colonialism as a hegemonic vision for understanding the proper relationship among territories. Development was thus constructed as part of the struggle over these shifts in global power relations and how they should be reconstructed – but it did not simply abolish and replace pre-existing discursive orderings of these relations. Instead, it grew out of, drew on, transformed and added to them.

The ILO would soon issue a 'flood of certificates of ratification' for the forced labour conventions to 'newly independent states in the 1950s and 1960s.' Ratifications were part of the decolonisation process, symbolizing a 'break with the colonial past' and the forced labour practices associated with it (Maul, 2007:488). Indeed, Ghana's use of the 1957 Convention to challenge Portuguese practices was simultaneously a move in support of the anti-colonial struggle in Angola (Allina, 2012b; Luce, 2009). Yet many of these countries also imposed forms of labour relations marked by coercion and compulsion – justified by a need for development framed as an 'emergency situation comparable to a state of war.' Claims and counterclaims were made into the 1970s over the attempt to impose standards upon newly independent states to which their former colonial powers had not, in practice, been held accountable (Maul, 2007). Debates around the issue subsequently became less prominent. Some development projects imposed as humanitarian measures, however, depended on labour relations that could hardly be referred to as 'free' or liberating (see Rossi 2015).<sup>x</sup>

These complex historical entanglements of unfree labour, colonialism, abolitionism and development begin to make sense if we acknowledge development's roots in the 'civilising'

mission which justified colonisation – and, as seen above, in the developmentalist strategies of late colonialism. While exhibiting fundamental divergences with colonialism, development is nonetheless firmly rooted in colonial discourse and practice, premised on the notion of an inferior Third World in need of assistance (Escobar, 1995; see also Frank, 1966; Roy, 1987; Shiva, 1988; Amin, 1990; Rist 1997) and intertwined with aspirations for capitalist growth and expansion. Post-development and postcolonial development thinking (see: Sylvester, 1999; Chakrabarty, 2000; Kapoor, 2008; McEwan, 2009; Radcliffe, 2005) point to particular forms of power and knowledge as integral to the development project (Glassman, 2011). These involve processes of representation rooted in relational histories, not least those of empire and colonisation (Said 1978; Hall 2002). As McEwan puts it, ‘colonial spaces,’ like development spaces, ‘were also rendered knowable, and thus controllable, through various processes of mapping ... and categorization ...’ (2009:87), processes within which geography and geographers have played important roles (see Power and Sidaway 2004).

Fundamental to the development project has been a spatial imaginary which divides the world into West and East, North and South, First and Third, Developed and Developing (Slater, 1993). As Kothari argues, spatial and historical imaginations are intertwined: subjects of development are distanced, existing ““over there” ... but also imagined as existing “back then”” (2011). This echoes Coronil’s argument that processes of geographical fetishisation are also ones of historical fetishisation, ‘serv(ing) to root the histories of connected peoples in separate territories and to sever the links between them’ (Coronil 1996:77), leaving them subject to the humanitarian logic outlined by Lester. In the context

of (anti-) TFLS, we argue that this logic underpins a dehistoricised and depoliticised ‘politics of rescue.’

### **Methodology: (De-)Constructing Anti-TFLS as Development**

Given the complex entanglements of colonialism, development and abolitionism outlined above, and what this reveals about development as a postcolonial project, we seek to trace the emergent links being forged between (anti-)TFLS and development. Our aim is to provide a framework for interrogating this linkage, to consider the politics of anti-TFLS as development which are being constructed. By tracing this important discursive shift as it occurs, we seek to lay the ground for continuing analysis of the possibilities for action which anti-TFLS opens up and/or forecloses. Echoing Escobar’s (1992) distinction between ‘alternative developments’ and ‘alternatives to development,’ we suggest that this provides a basis from which to consider both alternative versions for, and alternative visions to, anti-TFLS.

We apply Critical Discourse Analysis (CDA) to recent iterations of two paradigmatic texts: the 2015 TiP Report and the 2014 GSI. These two reports, which we describe below, are widely cited as sources of information on TFLS and anti-TFLS. The former has served as a key tool for the US government to position itself as a leader in combating trafficking (and now ‘slavery’) since the turn of the century. The latter is a more recent entrant to the anti-TFLS arena and has garnered widespread attention and legitimacy (in spite of important criticisms), signifying a renewed importance of NGOs and business actors in setting the agenda for anti-TFLS. We chose to analyse reports published during the period in which the SDGs were being agreed; the proposed indicators, released in July 2014<sup>xi</sup> included target 8.7

covering forced labour and child labour. The SDG's came into force on January 1<sup>st</sup> 2016, with Target 8.7 amended to further include 'modern slavery and human trafficking'. The texts selected for analysis emerge at a turning point in the representation of TFLS, and therefore form a significant part of the shift to TFLS as a problem of and for development.

CDA is one of several discourse analysis (DA) techniques, distinguished by its focus on the performative aspects of discourse – the ways in which discourse both emerges from and in turn shapes (and limits) material social practices and beliefs (Fairclough 2000; see also Stubbs 1983). We are interested in discourse as meaning and as meaning-making, and in the social relations that imbue certain discourses with the power to shape meaning while stripping others of the same.

In practice, CDA involves two, interwoven practices. *Interdiscursive analysis* is concerned with *which* discourses, genres and styles are present / dominant, the forms in which they are articulated, and how they relate to one another. *Linguistic or multimodal analysis*, considers the presence, characteristics, and functions of different semiotic modes, (language, visual imagery, symbols, etc.) (Fairclough 2009:7). Our analysis therefore proceeded in two stages. We first undertook close and multiple readings of the two texts in order to produce a broad characterisation of the discourses, genres, and styles that pervade each, and to draw out the relationships among different discursive moments. Multi-modal analysis was conducted to identify the presence and characteristics of different discourses, genres, and styles in different semiotic modes. Here we focussed on the modes of language, numbers, and visual imagery (primarily maps, charts and photographs). In the second stage we employed computer assisted qualitative data analysis software (CAQDAS) using NVivo 10 software to codify aspects of the analysis, and to manage comparisons of discursive

strategies, continuities and discontinuities, latent shifts in approach / meaning, and strategic absences, across the two texts. An innovative aspect of our approach is our application of CDA to the analysis of *methodology* as discourse. Methodology includes methods but is also a theoretically driven process of constructing social objects (Bourdieu and Wacquant, 1992) through choices around which methods to apply, the practices conformed to in applying them, and the interpretations of these (Olsen and Morgan, 2005). Thus, the critique we wish to make does not comprehensively cover the technical aspects of data creation / collection and analysis but rather asks how methodological choices form part of the discursive strategy framing TFLS as a problem of and for development.

### **Examining Anti-TFLS as Development**

#### *The Reports*

The TiP report has been published annually since 2001 by a specialized agency formed within the US State Department<sup>xii</sup> as a requirement of the USTVPA. The Act made trafficking in persons a federal crime and instituted a new US visa category for ‘victims of human trafficking’ (with eligibility subject to specific conditions). Yet its ambitions go beyond domestic borders. The ‘TiP rankings’, a tool designed and implemented by the US Government to monitor global conformity with its unilateral standards, form the heart of the report. The ‘performance of governments with respect to trafficking is’ thus ‘assessed ... against criteria drawn up and imposed by U.S. bureaucrats and politicians’ (Gallagher, 2011:386). The rankings, backed up by potential sanctions for non-compliance, have become integral to the global dissemination of an anti-TFLS agenda which positions the US as the arbiter of appropriate and sufficient anti-TFLS measures globally.

Sanctions<sup>xiii</sup> extend beyond the termination or withholding of bilateral financial assistance, which itself includes anti-trafficking funding adding up to ‘more than \$250 million in foreign assistance funding to support more than 880 anti-trafficking projects worldwide’ since 2002 (US Department of State 2016). They also include potential U.S. opposition to the provision of multilateral assistance, although this ‘can be waived if the [US] President determines that the provision of such assistance...would promote the purposes of the TVPA or is otherwise in the United States’ national interest’ (TiP 2015:48). In practice, those subject to sanctions (at least in the early years) were *already* subject to sanction for other reasons, e.g., Sudan, North Korea, Burma, Cuba and Venezuela (Chuang, 2006). The question of whether some countries were escaping scrutiny entered formal politics for the first time in relation to alleged ‘political distortion’ of the 2015 rankings, the subject of a Reuters Special Investigation (Szep and Spetalnick 2015) which has resulted in a Congressional hearing and promised legislation.

The 2015 TiP report devotes 3.5 pages (of a total 382) to ‘methodology’, in which it describes the criteria for determining each state’s placement into Tier 1 (best), Tier 2, Tier 2 Watchlist or Tier 3 (worst). These cover four criteria, three relating to measures to legally prohibit and deter trafficking and to prosecute and punish trafficking offenses while the fourth requires states to ‘make serious and sustained efforts to eliminate severe forms of trafficking in persons’ (TiP 2015:49). Much of the methodology section is taken up by a list of the indicators used to translate these criteria into tier rankings. Nine such indicators are listed, five of which relate to identification of, and provisioning for, ‘victims’, expanding the explicit domain of the criteria to align with the UN Trafficking Protocol. The indicators are notable for their imprecision. With the exception of designating ‘sufficient’ punishment,

they are open-ended, and amenable to substantial latitude in interpretation.

Producing the GSI is one of the key activities of Walk Free, a relatively new NGO, founded by Australian mining magnate Andrew Forrest and his spouse, philanthropist Nicola Forrest.

The first annual GSI report in 2013 produced an estimate of 29.8 million slaves, a figure which has climbed each year to 45.8 million in 2016.<sup>xiv</sup> These made-for-headline estimates have garnered widespread publicity for the GSI and Walk Free. The GSI further *ranks* countries according to: 1) government policy; 2) vulnerability to slavery; and 3) prevalence of 'slavery.' Development features most explicitly in the GSI as one of the quantifiable factors used to assess vulnerability, measured through 'variables' such as the Human Development Index, GDP per capita (PPP), international debt, and the social safety net.

Gallagher, a legal expert on trafficking, has critiqued the GSI as being based on 'a mysterious, inconsistently applied methodology, a raft of unverified assumptions and multiple, critical errors of fact and logic' (2014). Guth et. al. refer to the methods as 'improper' and doing damage to the 'public policy debate on slavery by advancing data and policy that is not based on sound methodology' (2014:14). Here, however, our aim is not to 'correct' these sets of rankings. We want to highlight that the problems are not just technical. They are more fundamental than this, concerning the *assumptions* which must be made and the *framings* relied upon in within the reports. Specifically, we are interested in how 'development' is manifested in relation to TFLS, and vice versa.

## *Symbolic Judgment*

On the 'findings' page of the GSI is a large map representing the estimated percentage of national populations in 'modern slavery' (Walk Free Foundation 2014a:14-15). Africa is covered in red. The Middle East and most of Asia are painted in shades of red and orange, faring hardly better, while lighter shades in Latin America seem to indicate progress. In turn, Western Europe, North America, Australia and New Zealand tend towards pale yellow. The TiP reports also adopts a colour coding scheme to designate poor and middling state performance in tackling TFLS in the Global South, although it is green used to designate the strong performing states of the Global North. These images appear to suggest the Global North metaphorically shedding light onto the dark parts of the world where slavery 'still' flourishes. This is replete with colonial overtones, ones which have been carried into the modern project of development. Interestingly, in the GSI, this map is more prominent than the images of rankings (which are used to create regional maps within the respective sections of the report). This image of 'prevalence' (together with the text) communicates a powerful condemnation.

There is much that can be said about the quantification of TFLS (see Desrosières 2014). In the case of these reports, however, the common thread is that quantification is used to create explicit sets of rankings.<sup>xv</sup> In the GSI, these are formulated by drawing on data which include *existing sets* of rankings (e.g., Gross Domestic Product, Human Development Index score, progress towards the Millennium Development Goals, etc.). Rankings are a particular form of 'list' which 'assemble(s) disparate items into ordered classes of things, making problems amenable to targeted, cross-boundary intervention in novel ways' (De Goede et al. 2016:3). Rankings further give rise to more 'lists': in the GSI, there are numerous

groupings of 'The ten countries which...' The exercises do not indicate a precise and stable location of the boundaries between 'developed' and 'developing' – for as Coronil argues, the fluidity of these categories makes them resilient (Coronil, 1996). But they certainly do figure TFLS as emblematic of a lack of development. It is a problem whose source is 'over there' (and as we shall see, 'back then'). And it is national governments that are expected to address the issue – they are the ones being ranked, and for the most part (exclusively in the TiP report) they are the ones being given 'recommendations' for action.

Broome and Quirk's (2015) work on benchmarks is helpful here, noting that they assess not only quality of conduct and quality of design (i.e., for the GSI, government response) but also quality of outcome (vulnerability and prevalence) – and that they constitute 'symbolic judgment.' What is both shocking and telling is that the prevalence appears to deliberately misrepresent the location of many 'victims.' According to the accompanying report on methodology, 'estimates of modern slavery represent the minimum number of a country's nationals enslaved anywhere in the world' (Walk Free Foundation 2014b:6). This lends support to the thesis that it is symbolic judgment being enacted – with this judgment principally aimed at 'sending countries' (largely in the Global South) while 'receiving countries' (largely in the Global North) are essentially exculpated for failing to ensure the fundamental rights of migrants and workers.

The TiP report produces only regional maps, but when the images are stitched together the global map shows not dissimilar patterns to that of the GSI. There are, then, similar patterns of symbolic judgment with many 'destination' countries ranked in Tier 1 and 'origin' countries in Tier 3. While we lack the funds to access the Verisk Maplecroft Modern Slavery Index (formerly the Forced and Involuntary Labour Index) produced for those concerned

with assessing 'risks' of modern slavery (i.e., large corporations), the map looks strikingly similar to those of GSI and TiP, with the risk of modern slavery 'especially high in African and Middle Eastern nations, while countries in the Americas and Eurasia are typically at medium or low risk' (Dahir, 2016)<sup>xvi</sup>. The symbolic judgment operating through the rankings and maps is one which draws on and reinforces a geographical imagining of good and bad places, largely equated in these reports to good and bad governments.

### *Knowledge*

While we consider the depiction of (potential) 'victims' below, victims and ranked countries are not the only ones represented. Rather, authoring strives to project authority – to position oneself and others as the legitimate actors to identify and diagnose a problem, apportion blame, and formulate appropriate responses. It is telling that the US did not include itself among those ranked until the 10<sup>th</sup> annual TiP report in 2010. Through the reports, the author, the reader, and (prospective) allies are being represented. The TiP report and the GSI feature prominent quotes from William Lloyd Garrison and William Wilberforce respectively, positioning both author and reader as the heirs of these white male abolitionists. Combined with the portrayals described below, it becomes clear that the reports are never meant for the 'enslaved' but for their would-be liberators. While the 'politics of rescue' has been widely critiqued (Soderlund, 2005; Kempadoo et al, 2005), it is important to note that selective histories which forefront the role of white / European abolitionists (e.g. Hochschild 2005 and the Antislavery Usable Past project<sup>xvii</sup>) are particularly problematic in conceptualising the linkage between TFLS and development. The darker aspects of this abolitionism are whitewashed while 'the West' is absolved 'from complicity

in sustaining contemporary conditions of exploitation, force and violence in labour markets' (Kempadoo 2016b:10).

In both colonial and developmentalist relations, *knowing* and *mapping* have been central to building and maintaining power by constructing 'regimes of truth'. The very exercise of ranking is based on and reinforces ideas about which actors possess the objective (thus never self-interested) capacity to identify, define, measure, map, and diagnose the overall problem rather than its particular manifestations – and therefore who should prescribe the remedy. That the GSI's estimates for 167 countries are based on 19 'data points' as well as 'documented, reliable sources for 58 countries' (Walk Free Foundation 2014b:2;9) is somewhat astounding but it is not, at heart, a statistical question. Rather, quantifying political, economic, geographic and cultural variations to create a classificatory schema of difference and similarity, then tautologically treating this as a reliable indicator of further differences and similarities such as proportions of the population assumed to be in 'slavery', is a question of 'knowing,' mapping and power.

Choices around the data sources used for the ranking exercises thus speak volumes about the construction of legitimate knowledge. The incredible mass of 'data' thrown into the GSI is subject to a near-dizzying array of calculations. The GSI relies on a wide selection of data from a range of sources. The authors present them as the most appropriate data sets to draw on in part because they are the ones which enable cross-national comparison, but this need for comparison at the national scale is presented as already obvious – rather than formed itself by a particular understanding of the scale and location of the problem, the solutions, and the actors responsible for each.

More fundamentally, the GSI defends the sources as the most ‘reputable,’ precluding questions of where the data is produced, by whom and for what purposes. The data sources include two US government bodies, the State Department and the CIA. They include the World Bank, the multilateral institution most associated with promoting development and within which the US has the greatest voting power. They also include three organizations dedicated to the promotion of ‘freedom’: Freedom House, which ‘advocate(s) for U.S. leadership and collaboration with like-minded governments’; TI, which has from the start positioned itself as a champion of development; and Property Rights Alliance, which has a particularly neoliberal agenda. The latter organization’s international work includes two key issues: piracy / counterfeiting and ‘property law and protections in developing countries in order to foster economic growth and democracy.’ All three produce their own indices ranking countries with associated maps; the map of TI’s Corruptions Perceptions Index is scarcely distinguishable from the GSI’s map of ‘slavery’s’ prevalence.

In some ways, the TiP report’s presentation of methodology takes an opposite tack to the GSI. In keeping with preceding reports in the series, TiP 2015 dispenses with any pretence to methodological rigour. There are no appeals to complex statistical procedures to denote quantitative sophistication. Aside from noting the date range in which the information was collected (TiP 2015:45), no information is provided in support of replicability. A diverse range of sources and materials are listed as the basis for compiling rankings (TiP 2015: 45),<sup>xviii</sup> but no detail is given as to how the completeness and accuracy of information is determined, how different sources are accorded legitimacy / validity, how different criteria are weighted in determining tier placements, and whether high performance on one or more indicators compensates for underperformance on others. Placement into the different

tiers depends on: the 'extent' of compliance; 'significant efforts' at compliance; the 'extent' of trafficking; and 'very significant' or 'significantly increasing ... absolute number of victims'<sup>xix</sup> – none of which appear to be easily quantifiable.

Yet while the appeals to validity differ, and the TiP report is fundamentally unilateral compared to the more 'international' approach of the GSI, there is a common thread in terms of what constitutes 'legitimate' knowledge. In both approaches, it emanates from 'experts' in the Global North. Drawing on such 'expertise' serves to reinforce a view in which much of the Global South is already imagined as both lacking freedom and in need of development. While important details may differ, the overall shape of the ranking exercises are predetermined by this conception of legitimate knowledge, with implications for who has the right to decide upon the proper course of action.

### *Geographical fetishisation*

Drawing on critical feminist scholarship, the narrative of 'victimhood' is a key starting point for critiques of anti-TFLS agendas (see Cojocaru 2016). Neither the GSI nor the TiP report have dropped the language of 'victims' and 'slaves' (the TiP report using the latter more selectively) but the terms now sit alongside 'survivor' and 'worker' in momentary equivalence. It is difficult to discern the rationale for using one term instead of another – except for one rule, which is that there is no such thing as sex work or a sex worker in the TiP report (with relatively sparse use of the terms in the GSI report). The gendering of TFLS is similarly unstable, with both reports taking pains to include male 'victims' – presumably in response to earlier critiques of an over-emphasis on 'sex trafficking' and female victims. The GSI opens with examples involving 'children,' 'men,' 'women and girls' and 'domestic

workers' (Walk Free Foundation 2014a:6) while the TiP report similarly starts with examples of 'women and children,' 'girls,' 'farmworkers' and 'fishermen' (TiP 2015:2). Yet take a step back and one finds that 'women' 'children' and 'child' are among the most frequently occurring words.

Photographs of 'victims' in the TiP report are almost exclusively 'non-white.' Throughout the report, race, though never mentioned, performs a powerful framing role. 'Victims' are represented as diverse but rarely identifiable as 'white', while the only photographic representations of people who are clearly 'white' are in relation to taking action against TFLS: Secretary of State John Kerry delivering an anti-TFLS speech at the White House (TiP 2015: preface); an 'awareness raising event' outside the UK Houses of Parliament (TiP 2015: 24); an open-air anti-TFLS exhibition in Kiev (TiP 2015: 25); and those designated 'TiP Report heroes' who include both 'white' and 'non-white' individuals (TiP 2015: 41, 43). In the GSI, the issue of race is quite literally masked in the images which represent victims. The photos appear in sepia, deflecting questions about why most victims also appear to be 'non-white' (beyond the narrow explanation of 'discrimination' offered by the GSI). Further, faces are obscured, partially or fully cut out of the frame, or unseen due to the fact that the subjects are turned away. This is not due to concerns' over confidentiality, as only some (often borrowed or reproduced) images are of 'victims,' while others are of workers engaged in similar activities and still others are professionally staged representations. The imagined geography of TFLS in these reports, then, exhibits 'territorial dimensions of racism' (Bedford 2015:35) in their representation of victims and 'heroes' while forestalling any historically rooted understandings of racial inequalities (see Beutin 2017; Stewart 2015).

## *Culture*

The demand for cheap labor and weak rule of law, coupled with high unemployment in developing countries, fosters the phenomenon of trafficking in persons. These factors are compounded where corrupt officials facilitate irregular migration by accepting bribes or false documentation.

(TiP 2015:18)

While the reports name unemployment, poverty, and discrimination as factors correlated with TFLS, the quote above demonstrates that the logic of the reports locates the causes of these, and of TFLS more generally, in the countries the problem is identified with. The special interest topic 'Overcoming Harmful Cultural Norms' in the TiP report (TiP 2015:20-21) further draws our attention to the centrality of 'culture' in these explanations. The report states that 'Unfortunately, some cultural norms are at times used or distorted to justify practices or crimes, including modern slavery, that exploit and harm others' and that 'harmful cultural norms drive inequality, poverty, and discrimination' (TiP 2015:20). The term 'cultural norms' is used interchangeably with the terms 'traditions' and 'customs' throughout the report. Here we find a striking reversal of the idea that a 'new slavery' is upon us; instead it is suggested that slavery is associated with a lack of progress and advanced civilisation. Thus inequality and poverty must be addressed if we are to tackle TFLS, requiring 'assistance' from the Global North. On this reading, it is not the practices of powerful actors which must be transformed nor the historical roots of these power relations which must be questioned. Rather the problem resides in local cultures within the lowest-ranked countries. This is an unreconstructed vision of modernizing development.

The 'cultural drivers of poverty' thesis is thus resurrected and augmented with an allied 'cultural drivers of TFLS' thesis. It reaches out to 'a larger colonial tradition' framing

‘imperialism as a moral responsibility’ which is very much alive in the development-orthodoxy. Blaming TFLS ‘on the toxicity of certain cultures’ suggests that ‘superior cultures’ still bear the ‘burden of a civilizing mission’ (Parreñas et al, 2012:1022-1023). It serves as (further) justification for a contemporary ‘civilising mission’ in the guise of abolitionism. The damage caused by ‘traditions’, ‘customs’, and ‘cultural norms’ pervades the report, occurring regularly in the ‘country narratives.’ Similar references can be found in the GSI, e.g., ‘the traditional cultural mindset that slavery is acceptable in Mauritania’ (Walk Free Foundation 2014a:69); the ‘common cultural practice that involves children being sent to work for other families’ in Haiti (Walk Free Foundation 2014a:73); ‘traditional cultural practices of child marriage’ in Uzbekistan (Walk Free Foundation 2014a:71); and ‘culturally accepted practices that are tantamount to modern slavery’ in Pakistan (Walk Free Foundation 2014a:79). ‘Over there’ is also ‘back then.’ ‘Developing countries’ are located in an imagined past era, but they are also damned to an eternal present – unless ‘we’ rescue them.

Culture is more expansive than the traffickers and even includes victims. In earlier periods, slaves were understood to need time to transform their mentalities and practices in order to become free workers; today former victims are understood as needing restitution – but also ‘rehabilitation’ and ‘reintegration’ (see Shih 2014). The latter term suggests that much of the problem is embodied in the ‘victim’ as an unfortunate bearer of problematic culture, rather than the inequalities through which his/her exploitation was produced. By this logic, the victim is among those who must be changed. In contrast, actors such as large corporations, governments in the Global North, and multilateral institutions should rise to the challenge of combating TFLS but need not be ‘rehabilitated.’

Perhaps frighteningly for the authors of the reports, it does prove difficult to contain the backwardness to 'over there,' for it may be transported through global capital and mobile bodies. For example, 'some cultural and religious groups throughout Australia' (presumably the aforementioned 'nationals' from Asia) 'still practice child marriage' (Walk Free Foundation 2014a: 109). The problem of TFLS in modern Australia here seems to be one in which the country is tainted by backward Asia in the form of 'some ... groups' of people who clearly do not belong (see Shih, 2016). 'Over there' and 'back then' can be brought 'here' (or even be here already).

### *Connections to 'Others'*

'Their forced labour is what we consume.'  
(Walk Free Foundation 2014a:11)

The quote above, possible only because 'we' as potential liberators have been distinguished from 'them' as (potential) victims, is a question about the appropriate response to problematic 'material connections.' Thus we turn our attention to the connections which surface in the report and the discursive strategies used to deflect or resolve them. For example, the TiP report dedicates substantial text to the rise of Da'ish in Iraq, and to characterizing its campaign in terms of TFLS (US Department of 2015:31-40; 190; 324-325; 340), without ever referring to the US-coalition invasion of the Country in 2003.

The first set of 'connections' are through supply chains. This is a key theme in the GSI report (and addressed elsewhere by Walk Free) and the 2015 TiP report has a 'special emphasis' on 'Preventing Human Trafficking in Global Supply Chains' (TiP 2015:13 - 34). Here, the discursive framing is dominated by the 'risks' posed to well-meaning governments,

businesses, and private citizens of seemingly inadvertent contamination by TFLS ‘elsewhere’ in global supply chains. On the other hand, those who ‘profit’ from TFLS include the traffickers themselves (including brokers facilitating child marriages or sham adoptions, labour recruiters, gangmasters, and smugglers); pimps and brothel owners; organized crime groups; rebel groups; corrupt officials; and selected governments such as North Korea, China and Uzbekistan. Some employers and companies may also ‘profit’ but only those directly using trafficked/forced/enforced labour. Governments undertaking procurement efforts and companies monitoring their supply chains are understood to have a ‘responsibility’ to address TFLS but not to have ‘profited’ from it. The high prevalence of ‘modern slavery’ in the Asia Pacific region is attributed in the GSI to the fact that ‘many countries in South and South East Asia provide the *low-skilled* labour at the production stage of global supply chains’ (Walk Free Foundation 2014a:34; emphasis added). This deflects consideration of the possibility that corporations are able to obtain inputs produced through low *wages* as a result of historical and political factors – including the rules of global trade enforced through institutions such as the World Trade Organization – which go unmentioned in the report. That low wages at the ‘production stage’ of global supply chains may enhance profits for global buyers (see Mezzadri 2017) appears unsayable.

The second set of ‘connections’ relates to migration regimes. Both reports emphasize that various types of migrants should be screened for indicators of trafficking and that victims of trafficking should not be detained and deported, without questioning any other aspects of migration restrictions, detention and deportation. Nor, according to the reports, should victims be criminalized for any crimes they were forced to commit, again without questioning broader issues related to criminalization. The GSI points to causal factors

including discrimination ‘on the basis of ... immigration status’ and ‘high levels of irregular migration’ in Turkey (Walk Free Foundation 2014a:42-43) but also to a ‘lack of effective migration regulation’ in the Asia Pacific region and ‘weak immigration controls’ in Sub-Saharan Africa. As an exception which proves the rule, the GSI report admits the opposite possibility once: ‘restrictive migration policies in North America’ are noted as contributing to vulnerability (Walk Free Foundation 2014a:64). More generally, the vulnerability of migrants appears as an inherent property, e.g., where the TiP report states that, ‘migrants can be quite susceptible to human trafficking’ and ‘their immigration status ... can make them vulnerable’ (TiP 2015:17). What is not said is that states’ differential restrictions on migration, and on migrants’ activities and mobilities, put workers at a distinct disadvantage (see Schierup et. al. 2015), heightening the extent to which they may be exploited through low pay, non-payment, intensification, inadequate health and safety protections, and flexibilisation (alongside risks of the migration journey itself in the face of such restrictions). These restrictions are not neutral but rather perpetuate long-standing racialized inequalities.

The discursive formulation of anti-TFLS as development therefore functions to interpret and manage problematic ‘connections’ of suffering and privilege operating through and across borders. It builds on existing formulations postulating TFLS as distinct from other questions of migration and labour exploitation but reworks these through a developmentalist perspective rather than (only) a criminal justice one. These two perspectives remain in tension, however, as demonstrated by the claim that Tier rankings are *not* ‘affected by ... broad based ... developmental initiatives’ (TiP 2015: 47), in spite of the strongly developmentalist narrative present in the report.

## Conclusion

We have argued above that TFLS is increasingly being framed discursively as a problem of and for development. We have outlined the ways in which this framing is problematic. First, we have considered the ways that TFLS, colonialism and development have been historically entangled and placed this within critical understandings of development more broadly. We have traced the discursive shift to (anti-)TFLS as development at its moment of unfolding by analysing two emblematic texts on TFLS. We have considered how they rely on (questionable) forms of quantification and rankings which valorise knowledge of ‘experts’ in the Global North and replicate racialized representations of ‘victims’ and ‘abolitionists.’ We have then shown how the problem is framed as one of underdevelopment in which ‘over there’ is imagined as ‘back then’ (Kothari 2011), a problem reduced to ‘strong economies’ and ‘weak economies’ and stemming from ‘culture,’ a problem which can be diagnosed and remedied by experts in the Global North as the inheritors of a seemingly noble abolitionist tradition. This serves as a refusal to trace the violent historical and political origins of the present status quo – not least those of colonialism and of the development project – and to recognize continuities. The legacy of structural adjustment and export-oriented production and its detrimental effects on livelihoods and workers’ rights (Mezzadri 2015), for example, is wholly absent. And the complexities and contradictions of earlier abolitionist movements are ignored – including abolitionism’s problematic historical ties to development.

The framing of TFLS as development also serves to forestall recognition of the many forms and instances of accepted forms of state violence which give rise to problematic connections – through colonialism, the development industry, and practices of global capital (facilitated by unequal trade and aid regimes, military power, and not least, migration

regimes). Kempadoo has recently argued persuasively that anti-TFLS constitutes a contemporary ‘white (wo)man’s burden’ (2015). By examining the spatio-historical imagining of the shift to ‘anti-TFLS as development,’ we have shown that the logic of the ‘white (wo)man’s burden’ is not challenged by this shift, but rather reinforced and extended by it. While this shift promises to amend the criminal justice framework, then, it is instead likely to perpetuate a global politics of rescue through a dehistoricised, unproblematic notion of development as ‘good change.’

Critical scholars of development therefore have a role to play as TFLS becomes entrenched within development policy and practice. Our analysis has shown that TFLS is being addressed through familiar developmentalist narratives of modernisation and lack thereof. There is a need for counter-narratives to be made *within geography and development studies* which demonstrate how unfreedom and exploitation instead result from complex power relations that are always historically rooted (see Phillips and Sakamoto 2012). Brass further cautions us to avoid putting ‘faith in ... disinterested state intervention’ (2014:572) and as discussed above, we need to consider how efforts by non-state actors intersect with and reinforce state agendas. In light of this, just as we may consider the prospects for not only ‘alternative developments’ but also ‘alternatives to development’ (Escobar 1992), we might consider both responses to TFLS which subvert the politics of rescue alongside alternatives to anti-TFLS per se – that is, alternative ways of responding to unfreedom and exploitation. We would point to examples such as the work of the Coalition of Immokalee Workers (Asbed and Hitov 2017), efforts to combat ‘slave labour’ in Brazil (Carstensen and McGrath 2015; McGrath 2013) and the push for supply chain liability (Muskat-Gorska 2017) but also calls for reparations (Quirk 2015) and for No Borders

(Anderson et. al. 2011) alongside calls for reflection on histories of indenture (Kothari 2013; Kempadoo 2017) and recognition of struggles over freedom as struggles over power (McGrath and Strauss 2015). Rather than a politics of rescue in the form of development, we would call for a politics of solidarity to support struggles such as these which are based in alternative practices and alternative imaginaries.

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<sup>i</sup> 'Take immediate and effective measures to eradicate forced labour, end modern slavery and human trafficking and secure the prohibition and elimination of the worst forms of child labour...'  
(<https://sustainabledevelopment.un.org/sdg8>; accessed 9 April 2018).

<sup>ii</sup> The UNODC 'Protocol to Prevent, Suppress and Punish Trafficking in Persons, especially Women and Children', also called the 'Palermo Protocol.'

<sup>iii</sup> Dottridge (2014) cites a Freedom Fund estimate that OECD countries spend US\$120 million per year on anti-trafficking; see also the Global Funding Information Sheet available at: [http://www.gaatw.org/publications/ATR\\_funding\\_factsheet.07.29.2014.pdf](http://www.gaatw.org/publications/ATR_funding_factsheet.07.29.2014.pdf) (accessed 21 March 2017) and Global Modern Slavery Directory available at: <http://www.globalmodernslavery.org/> (accessed 21 March 2017)

<sup>iv</sup> Former US President Barack Obama has called 'modern slavery' the 'true name' of human trafficking (The White House 2012). The US State Department's Office to Monitor and Combat Trafficking in Persons website states that "'Modern slavery,'" "trafficking in persons," and "human trafficking" have been used as umbrella terms...' (US Department of State 2017). In 2017, the Office introduced the Program to End Modern Slavery (PEMS). The ILO produced its first estimate of the scale of 'modern slavery' rather than simply forced labour in 2017.

<sup>v</sup> In a televised exchange surrounding UK Prime Minister David Cameron's visit to Jamaica in 2015, Esther Stanford-Xosei, Vice Chair of the Pan-African Reparations Coalition in Europe, called a proposal to spend part of the UK's development assistance budget to build a prison in Jamaica (in order to facilitate deportations of Jamaican nationals) a 'relic of colonialism.' MP Peter Bone responded to the call for reparations by highlighting the issue of 'modern day slavery ... looking to the future, not worrying about the past.' (Channel 4 News, 2015).

<sup>vi</sup> Townsend et. al. further suggest that development studies should consider the issue of post-trafficking livelihoods (2015).

<sup>vii</sup> There was also particular concern over the 'white slave trade,' a precursor to more recent concerns around 'trafficking' (Doezema 2010).

<sup>viii</sup> The United States has a dubious record on ratifications.

<sup>ix</sup> Kott notes that the ILO was founded 'as a counter to the Russian Revolutionary model' (2012:325).

<sup>x</sup> A recent report linking a World Bank project to forced labour is also notable (Human Rights Watch and Uzbek-German Forum for Human Rights 2017).

<sup>xi</sup> Outcome Document of the Open Working Group: <https://sustainabledevelopment.un.org/focussdgs.html> (accessed 9 April 2018)

<sup>xii</sup> The Office to Monitor and Combat Trafficking in Persons.

<sup>xiii</sup> Countries facing the imposition of sanctions are provided with 90 days to comply with US demands.

<sup>xiv</sup> The ILO's 2012 estimate was of 20.9 million people in forced labour; in 2017, the ILO produced an estimate in collaboration with Walk Free, published by Alliance 8.7, of 40.3 million people in modern slavery: 24.9 million in forced labour and 15.4 million in forced marriage. Estimates in the TiP report have varied considerably, in part due to the gradual shift from trafficking as a problem of migration to trafficking as modern day slavery. The 2015 report simply refers to 'millions' of victims.

<sup>xv</sup> The GSI report does not comment on the relation between its rankings and the already established TiP rankings. The TiP rankings are used as a data source in the GSI. There are more 'grades' in the GSI's assessment of government response than there are 'tiers' in the TiP rankings, and the GSI also assigns ranks to each country from best to worst.

<sup>xvi</sup> South Asian nations are also ranked negatively in the reports.

<sup>xvii</sup> <http://www.usablepast.ac.uk/> (accessed 21 March 2017)

<sup>xviii</sup> The Department of State prepared this Report using information from U.S. embassies, government officials, nongovernmental and international organizations, published reports, news articles, academic studies, research trips to every region of the world, and information submitted to [tipreport@state.gov](mailto:tipreport@state.gov) (TiP 2015:45).

<sup>xix</sup> Additionally, a protocol for automatic downgrading is in place, which can be waived by the Secretary of State.