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Anti-trafficking Chains

Structural Comparison of Corporate Transparency Legislation and Worker-driven Social Responsibility

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The campaign to address severe forms of labour market exploitation in markets around the world has led activists, unionists, policymakers, and legislators to explore the role of corporations in driving human trafficking and modern slavery (LeBaron, 2020). Based on the understanding that lead firms are not merely complicit actors but active contributors – through their purchasing and sourcing practices – to violations of workers' human rights and labour standards, the focus on corporations seeks to expand corporate responsibility to working conditions throughout global value chains (GVCs) (Anner, 2015). In

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this chapter, we compare two labour governance models that have developed in the quest to combat modern slavery.

To better comprehend the structural aspects of efforts to eradicate modern slavery within GVCs and the dynamics created around them, as well as the measures pursued and their implications, we further develop and employ our analytical concept of 'anti-trafficking chains'. This term refers to the provision of anti-trafficking services by both non-profit and for-profit entities to multinational corporations (MNCs), mirroring the logic and structure of supply chains (Barkay et al., 2024). The comparative analysis presented here focuses on two types of anti-trafficking chains: one that has proliferated following the enactment of State Anti-Trafficking laws in various countries and another that emerged from the deployment of the Worker Social Responsibility (WSR) model. This analysis seeks to discern the extent to which State Anti-Trafficking laws provide the expected hardening of soft-law anti-trafficking tools and to identify the conditions under which anti-trafficking chains may transform corporate behaviour and serve as drivers of change in human trafficking in GVCs.[1] To this end, this chapter offers a structural analysis of the governance models behind State Anti-Trafficking laws and WSR and of the power dynamics created by each.

Over the last two decades, enormous financial resources and organizational efforts have been invested, globally and nationally, in confronting human trafficking. Nevertheless, as systematically reported by the International Labour Organization (ILO), despite these efforts, the prevalence of human trafficking practices continues to pose an ever more worrying and pressing global challenge (ILO, 2017, 2018). As a result, in more recent years, scholars and policymakers have gradually come to recognize that the traditional tools used to combat human trafficking and other severe forms of harm in employment and labour exploitation – criminalization of traffickers, strict border control, and ex-post human rights assistance to identified victims – fall short (Dottridge, 2014; Chuang, 2014; Nolan and Bott, 2018). Concomitantly, scholars have developed anti-trafficking structural paradigms, such as the labour and development approaches, that identify the resistant nature of human trafficking in the power relationships and structures upon which contemporary local and global labour markets are built and operate (Shamir, 2012; Kotiswaran, 2019). These structural approaches argue that human trafficking – a major source of today's corporate revenues – is enabled and perpetuated by the intrinsic governance gaps that exist in GVCs (Raigrodski, 2016; Crane et al., 2019).[2]

This increasing emphasis on the importance of transforming the labour-market structures that enable and sustain human trafficking, and on the need to

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address issues of labour governance within GVCs, is reflected in the emergence of a new set of anti-trafficking tools that rely on the notion of 'corporate social responsibility' (CSR). Since the late 1990s, both the imbalance between the overwhelming influence of MNCs on labour markets, on the one hand, and the inability or unwillingness of states and transnational bodies to adequately regulate them, on the other, have led to a global spread of CSR models and practices and their integration in the corporate risk-management toolbox.

However, the recognition within the anti-trafficking field that corporations bear responsibility for their negative social and environmental impacts is a relatively recent trend. The CSR anti-trafficking tools include three main types: corporate self-regulatory (so-called soft-law) initiatives; State Anti-Trafficking legislation; and WSR schemes. This chapter focuses on the latter two, developed largely in response to mounting evidence of the ineffectiveness of corporate self-regulatory initiatives (New, 2015; Bartley, 2018).

Several countries have now adopted legislation aimed at addressing workers' rights in global supply chains (Coneybeer et al., 2023). This trend can be divided into two main legal approaches: 'transparency' and 'human rights due diligence' (HRDD). Under the transparency approach, laws require firms that meet specific threshold criteria to disclose the actions they are taking to protect workers' rights and to address issues of human trafficking in their supply chains. The goals of such laws are to increase the level of transparency in supply chain management and to expose corporations that allow severe exploitation in their supply chains to public and consumer pressures. Examples of such laws are the California Transparency in Supply Chains Act (2010), Section 54 of the United Kingdom (UK) Modern Slavery Act (2015), Australia's Modern Slavery Act (2018), and the European Union (EU) Non-Financial Reporting Directive (2014).

In contrast, under the HRDD approach, laws go beyond requiring mere disclosure. They obligate firms to undertake HRDD to identify potential human rights violations in their supply chains, to prevent them from happening, to mitigate them, and to account for how they are to be managed, including protection of workers' rights (Landau, 2023). HRDD legislation may range from a wide assessment of the working conditions of labourers down the supply chain to more specific child labour, forced labour, or modern slavery-related due diligence requirements. Examples of such laws are Section 1502 of the United States (US) Dodd-Frank Act (2010), the EU Conflict Minerals Regulation (2017), the Dutch Child Labour Due Diligence Law (2019), Germany's Supply Chain Due Diligence Act (2021), Canada's Forced Labour and Child Labour in Supply Chains Act (2023), and the European Corporate Sustainability Due

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Diligence Directive (2024). The latter marks the current prevailing trend among EU countries towards HRDD legislation (McCorquodale and Nolan, 2021; Marshall et al., 2023).

The underlying premise on which current formulations of State Anti-Trafficking laws are based – be they transparency- or HRDD-driven – is that the threat of having severe worker exploitation exposed poses a real business risk that will compel firms to take corrective action. Therefore, such laws often lack stringent enforcement mechanisms and sanctions, whereas the statutory reporting duties they introduce are crafted to allow and encourage consumers and investors to monitor corporations. Many in the anti-trafficking field view State Anti-Trafficking laws as promising tools for combatting human trafficking in GVCs (Han et al., 2022). Nevertheless, critical voices raise concerns regarding the capacity of State Anti-Trafficking legislation to make the required change, especially in the form of transparency laws. They argue that the tendency of legislators and policymakers to rely on market-oriented compliance mechanisms, and their adherence to the rationale of voluntary corporate responsibility rather than liability, cast serious doubt on the potential effectiveness of State Anti-Trafficking laws (Koekkoek et al., 2017; Phillips et al., 2018; Voss et al., 2019; Ford and Nolan, 2020). In light of such criticism, we explore the reasons for the limited effectiveness of anti-trafficking chains created in response to transparency laws in transforming severely exploitative employment practices in GVCs, compared to the impact of anti-trafficking chains arising out of the WSR approach.

WSR, much like State Anti-Trafficking legislation, presents an alternative approach to the identified failures of CSR (Gordon, 2017). It has been developed alongside other instruments for social dialogue-based supply chain governance by unions and workers' civil society organizations to compensate for the absence or limited labour law protections under supply chain capitalism (Reinecke and Donaghey, 2020). By establishing enforceable, negotiated agreements among workers, employers, and lead firms, worker-led labour governance instruments offer an alternative to both state-led and corporate-led approaches. Unlike corporate voluntarism or top-down regulation, these mechanisms leverage the power of affected workers and their coalitions. The literature distinguishes worker-led instruments based on actors involved, scope, and regulation modes, focusing mainly on Transnational Industrial Relation Agreements (TIRAs)[3] and WSR Initiatives (Haipeter et al., 2021; Blasi and Bair, 2019). TIRAs are bargained-for agreements between lead firms (either single or multiple firms) and trade unions (local, global, or both). These agreements span global supply chains and result in legally binding documents with enforcement

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mechanisms, including dispute resolution processes such as enforceable and binding arbitration (Ashwin et al., 2020). Under WSR schemes, workers, their direct employers (suppliers), and lead firms (purchasers) negotiate agreements stipulating that lead firms will only contract with suppliers that comply with universal labour standards. Importantly, the standards are strictly monitored and enforced by rigorous inspection bodies that are independent of corporations and suppliers and overseen by workers (Blasi and Bair, 2019).[4]

Proponents of this approach believe that it expands corporate engagement and genuine commitment to labour rights issues. The leading example and most successful case of the WSR model in action is the Fair Food Program (FFP) – a partnership of farmers, farmworkers, and retail food companies that aims to ensure fair wages and humane working conditions for farmworkers. The FFP was initiated and founded by the Coalition of Immokalee Workers, a worker-led human rights organization in Immokalee, Florida. Among other examples are: the Milk with Dignity Program, led by the organization Migrant Justice in the dairy sector in Vermont (USA); the Accord on Fire and Building Safety in the Bangladeshi garment sector; and the Lesotho agreements that focus on preventing gender-based violence and harassment in the garment sector.

In some ways, WSR is almost a mirror image of State Anti-Trafficking legislation and, particularly, transparency laws. First, WSR is driven by the bottom-up, grassroots activism of workers and their communities, joined by consumers, placing workers' voices and needs at its centre (Asbed and Hitov, 2017). Second, in contrast with the soft-law approach of transparency legislation, WSR's defining feature is its effective enforcement and monitoring mechanism, backed up by market consequences. Third, WSR creates a clear set of labour rights obligations that are directly informed and designed by workers' needs, unlike transparency laws that, thus far, have failed to include specific substantive requirements regarding workers' rights. Indeed, while the literature has severely criticized transparency laws as ineffective, WSR has been celebrated by many commentators as a prime solution to the labour governance deficit in GVCs (Asbed and Hitov, 2017; Blasi and Bair, 2019; Dias-Abbey, 2019a; Gladstone, 2020; Reinecke and Donaghey, 2021; Mieres and McGrath, 2021; Angelini and Curphey, 2022).

Despite the differences in the respective approaches of State Anti-Trafficking legislation and WSR, we compare them here from the perspective of the anti-trafficking chains they generate. We argue that the limited impact of transparency laws and the relative success of WSR schemes can be better understood by

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examining the two models through the lens of power resources and distribution within their anti-trafficking chains. To this end, we offer a structural analysis of the anti-trafficking chain developed in the UK construction sector following the enactment of the UK Modern Slavery Act (MSA) in 2015, alongside the anti-trafficking chain that emerged from the implementation of the WSR model by the FFP. The analysis of the former draws on data from exploratory research conducted between October 2018 and October 2019, employing a multiple-method qualitative design. This included content analysis of modern slavery statements published by 93 construction companies, semi-structured interviews with key actors in the UK anti-trafficking field, and participant observation in a modern slavery training session, also in the UK. Given the extensive body of research on the FFP, our analysis of the anti-trafficking chain in this instance draws on a range of secondary resources, including academic studies and policy reports, all of which we critically reviewed and analysed.

This comparative analysis primarily focuses on the power dynamics within GVCs in response to anti-trafficking initiatives. Therefore, while there are significant dissimilarities between the operational aspects of the supply chains of the GVCs in question, our analysis does not dwell on these aspects. Instead, it examines the different logics and structural interventions of the MSA and FFP in the respective value chains – construction supply chains in the UK and the fresh-tomato supply chain in the US. The qualitative nature of this research design requires us to exercise caution when attempting to generalize insights to broader contexts. However, for the purposes of this study, we contend that both the research design and the diversity of the cases examined not only do not impede our ability to compare anti-trafficking chains but also facilitate the elucidation of the *structural* factors that influence the efficacy of anti-trafficking chains in bringing about change.

The chapter proceeds as follows: The following section introduces the notion of *anti-trafficking chains*, linking it to critical perspectives in the literature on GVCs. In the third and fourth sections, we analyse the dynamics of the anti-trafficking chains that were developed in response to the enactment of the UK MSA and the implementation of the WSR approach in Florida's FFP, respectively. Drawing on the comparison between these two types of anti-trafficking chains, the fifth section discusses the inherent shortcomings of transparency legislation versus the potential of the WSR model to significantly improve working conditions in the lower tiers of GVCs and eradicate human trafficking throughout the supply chain.

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Anti-trafficking Chains

The growing emphasis of anti-trafficking efforts on the governance of GVCs in the last decade, alongside the growing public awareness of the issue of human trafficking, has led hundreds of corporations to adopt anti-trafficking codes of conduct. It has also given rise to an anti-trafficking industrial complex[5] comprising numerous civil society organizations, for-profit organizations, professional bodies, and multi-level and cross-sectoral initiatives. These organizations and entities provide the corporate sector with a range of anti-trafficking services and solutions (McGrath and Watson, 2018; Monciardini et al., 2021).

In the GVC literature, such organizations and initiatives are framed within what is termed a 'supporting environment', which is conceived by some scholars as a legal and social grid external to the value-creation process within which GVCs operate (Frederick, 2019: 31–32). We argue that this framing does not sufficiently capture the dynamics and power relations created both within the anti-trafficking industrial complex and between the organizations and entities that comprise this complex and the lead firms with which they engage (cf. Ponte et al., 2019). Instead, we introduce the term 'anti-trafficking chains' to refer to the dynamic web of anti-trafficking actors, initiatives, and activities in GVCs. Our conceptualization of a *chain* of anti-trafficking efforts in GVCs emphasizes the asymmetrical interdependence and supply-chain logic that characterize their modes of operation vis-à-vis lead firms and other entities in GVCs. Such an analysis of anti-trafficking efforts – one that focuses on the link between the structural dynamics of anti-trafficking chains and how they interact with GVCs – is instrumental to an understanding of the factors impacting their effectiveness as labour governance mechanisms.

Our conceptualization of anti-trafficking chains draws on the writings of critical GVC scholars who explore how value-creation processes generate and disguise a range of exploitative relationships and employment practices (Havice and Pickles, 2019; Nathan, 2019). We align with the neo-Gramscian perspective that, in recent decades, GVC governance is an increasingly contested terrain, where corporate, state, and national and international civil society actors vie to shape and control (Bair and Palpacuer, 2015; Palpacuer, 2019; Anner, 2023). Adopting this analytical lens, we observe that the struggle over GVC governance has evolved into a pendulum-like movement regarding the role of the state. The global spread of private CSR governance mechanisms since the 1990s marks a shift towards 'decentring the state'. Conversely, the emergence of State

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Anti-Trafficking legislation in recent years heralds a countermovement towards 'recentring the state' (Bartley, 2018; Palpacuer, 2019). Nevertheless, as corporate actors have successfully managed to mitigate the impacts of both movements on their operations, positive consequences for the welfare and working conditions of workers in the lowest tiers of GVCs have been markedly limited.

These observations raise the question of the specific conditions under which labour governance in GVCs would not be simply neutralized by the power imbalance and dynamics of GVCs. Further, we aim to better understand how, and to what extent, the structural and dynamic conditions under which anti-trafficking chains operate within GVCs affect their outcomes. We suggest that, unlike the anti-trafficking chains created by transparency legislation, which primarily engage with powerful lead firms, the WSR model fosters 'bottom-up' anti-trafficking chains that empower workers and, consequently, holds richer potential to serve as an effective labour governance mechanism in GVCs.

Supply Chain Dynamics under the UK Modern Slavery Act

Background

Section 54 of the 2015 MSA was the first piece of legislation in Europe to explicitly address human trafficking in supply chains. It was introduced during the Act's amendment phase after extensive deliberations, propelled by concerted pressure from a coalition of international and national civil society organizations urging the UK Government to specifically address the issue of modern slavery and human trafficking in supply chains (Pollitt, 2014). During the legislative process, multinational and local corporations had established a business lobby that championed a diluted model of transparency legislation among both legislators and NGOs (LeBaron and Rühmkorf, 2019). Ultimately, it was this model that informed the drafting of Section 54.

Section 54 requires any commercial organization with business activities in the UK and with an annual turnover of at least £36 million to publish a 'modern slavery and human trafficking' statement, approved by its board of directors and signed by a director, each financial year. The supplemental guidance of the MSA clarifies that, while companies are not required to guarantee that their supply chains are 'slavery free', they *are* expected to describe in their published statements the measures they have taken that year to eradicate modern slavery from their business and supply chains. Similarly, companies are not mandated

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to implement specific measures against human trafficking in their supply chains. However, those that have not taken any measures are required to issue an annual statement to that effect.

Rather than obligating corporations to undertake concrete actions, the MSA suggests six areas that may be included in the report: the business and supply chain structure; slavery and human trafficking policies; due diligence processes; the parts of the supply chain where there are risks of slavery and human trafficking and the measures that have been taken to mitigate them; and effectiveness of anti-trafficking policies and training. Lastly, in line with the principal rationale of transparency legislation from the business perspective – that human trafficking in supply chains poses a reputational risk – to ensure compliance with these minimal disclosure requirements, Section 54 explicitly relies on 'consumers, investors and Non-Governmental Organisations (NGOs) to monitor compliance and apply pressure on businesses' (Field et al., 2019: 39), rather than on state mechanisms for monitoring and enforcement (Craig, 2017; Sarfaty, 2020; Carrington et al., 2021).[6]

In July 2019, four years after the enactment of the MSA and following the publication of an independent review commissioned by the UK Home Office (Field et al., 2019), the latter launched a public consultation. The exercise was designed to invite feedback from the public and commercial and civil society stakeholders on proposed changes regarding: the content of modern slavery statements; the introduction of an annual deadline for statement publication; civil penalties; the applicability of the Act's provisions to the public sector; and potential features for a government-run reporting service for modern slavery statements. Following the consultation process, in July 2021, the UK Government introduced the Modern Slavery (Amendment) Bill to the House of Lords, aiming to strengthen the provisions of Section 54.[7] However, due to the prorogation of Parliament, this progressed no further. Meanwhile, new immigration laws introduced in the UK – the Nationality and Borders Act (2022) and the Illegal Migration Act (2023) – have been criticized for jeopardizing vulnerable individuals and victims of human trafficking by failing to offer them adequate support and protection (Brown, 2023; Weir et al., 2024).

Anti-trafficking Chains in the UK Construction Sector

The construction industry is globally recognized as one of the sectors most prone to severe labour exploitation (Cockbain and Brayley-Morris, 2018; Trautrims et al., 2021; UNODC, 2020). The UK construction sector is no exception. While

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there are no exact figures for trafficking and forced labour victims in the UK by sector, it is widely agreed that several sector-specific factors place construction workers at very high risk of exploitation and abuse (Werdmuller von Elgg, 2016; CIOB, 2018; FLEX and Stride, 2018; Guilbert, 2018). In particular, the sector's extreme volatility and fragmentation drive construction companies to rely heavily on outsourcing/subcontracting and on labour intermediaries and low-wage, low-skilled, and migrant workers (CITB, 2019; Rhodes, 2019; Pickard, 2023). Often not covered by regulatory agencies, these workers are the least protected and hence the most vulnerable to exploitation (Fudge, 2018).

Enactment of the MSA in March 2015 enhanced existing anti-trafficking efforts in the UK and gave rise to numerous others initiated by advocacy groups, NGOs, multi-stakeholder, (cross-)sector initiatives, and service providers. As a result, a thriving market for anti-trafficking initiatives, professional guidance, and legal services emerged. Notably, while the Chartered Institute of Building (CIOB) had already launched an anti-trafficking campaign in 2014,[8] it was only after the enactment of the MSA that anti-trafficking efforts around construction significantly increased and gradually attracted a response from the sector.

These anti-trafficking efforts were initiated by professional bodies, industrial associations, state agencies, and civil society organizations and most often consist of alliances with construction companies. Among such efforts are non-profits, such as 'Supply Chain Sustainability School', 'Stronger Together', and 'Hope for Justice'; professional bodies and associations like the CIOB, the Building Research Establishment, and the Construction Industry Training Board; and many law and accountancy firms, which provide construction companies with assistance in preparing formal modern slavery and human resources statements to comply with the Act.

Additionally, the UK's Gangmasters and Labour Abuse Authority (GLAA), a government agency tasked with investigating labour exploitation and other illegal labour market activities, has played a key role in anti-trafficking efforts within the construction sector. Specifically, between October 2017 and November 2022, the GLAA operated a joint sector-wide agreement called the Construction Protocol.[9] The move was intended to address human trafficking in the sector by fostering private–public and inter-sector collaborations, setting standards, supporting best practices, and sharing knowledge among its signatories.[10] In November 2022, however, the GLAA withdrew from all its sector-specific protocols, including the Construction Protocol, stating that it had 'moved to putting [its] resources into developing and supporting more focused

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partnership activity which is business-owned, with the GLAA providing the strategic oversight and expertise'.[11]

Based on our interviews and analysis of modern slavery statements published by construction companies that were signatories to the GLAA Protocol, these anti-trafficking efforts have led to a gradual increase in the sector's compliance with the minimal legal requirements of Section 54 of the MSA, as well as to an increase in awareness of human trafficking issues among construction companies. Nevertheless, like companies in other sectors (BHRC and MSR, 2021), many of the statements published by compliant construction companies are of poor quality, providing no or minimal information on the six recommended reporting areas and undertaking no proactive or beyond-compliance measures (see also Monciardini et al., 2021). A small group of companies within the sector, aiming to mitigate human rights risks in their supply chains and thereby secure their reputation, has initiated an intra-industry alliance. This alliance developed anti-trafficking tools that extend beyond mere symbolic compliance with Section 54 provisions, Yet, it has failed to engage a significant number of construction companies (Trautrims et al., 2021). All in all, despite the vibrant anti-trafficking activity developed around the construction sector since the enactment of the MSA, actors in the field suggested to us that the Act has not succeeded in driving any substantial corporate action to combat labour exploitation in supply chains.

We argue that the gap between the booming anti-trafficking activity around the construction sector, on the one hand, and the actual impact on the ground, on the other, has been structurally sustained by anti-trafficking actors being positioned as suppliers of human trafficking solutions and services to corporations. Due to the MSA's reliance on market compliance mechanisms and the inherent imbalanced power relations between corporations and anti-trafficking actors, the latter have been forced into a supply chain dynamic that has significantly limited their leverage over corporate behaviour. Such a dynamic particularly affects anti-trafficking activities in the construction sector, which is far less susceptible to consumer demands and pressures compared to other sectors such as retail or consumer goods. Interviewees suggested that the absence of major litigation or media coverage relating to trafficking in the UK construction sector had contributed both to construction companies' perception of immunity to external criticism and pressures and to the ambiguity and uncertainty surrounding the extent of modern slavery in the sector. Hence, human trafficking in construction supply chains creates little reputational risk.[12]

While the companies have increasingly adhered to the MSA's minimum reporting requirements, they have rarely taken measures beyond standard

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anti-trafficking compliance, suggesting that they may have complied with the MSA only for the potential regulatory risk it poses. Our findings show that training programmes and other generic toolkits were the most-reported measures implemented by compliant construction companies.[13] This was also supported by the observations of interviewees, who noted that construction companies' reporting trends were influenced by the structure and characteristics of the sector's supply chains, and particularly by their fragmentation. Severe labour exploitation is typically expected to occur in tiers 4 and 5 of the supply chain; yet, often, lead firms have limited to no knowledge of suppliers and subcontractors beyond tier 1 or 2. Consequently, compliant construction companies tend to adopt anti-trafficking measures such as employee training sessions on modern slavery that do not require their involvement in the very tiers of their supply chains where the gravest violations may occur.

The reporting requirements introduced in the construction sector, and, more broadly, the corporate market for 'modern slavery tools and solutions' created by the MSA, have bound anti-trafficking efforts in supply chains to activities that allow corporations to comply with the minimal commitments specified in their published statements. The numerous anti-trafficking initiatives, organizations, and consultancies that offer construction companies a range of services, including training programmes, due diligence audits, and other solutions to assist them in complying with the Act mirror this reality. Under these circumstances, anti-trafficking initiatives, which often rely for their reliability and legitimacy on sector support and are constantly competing for corporate contracts and sponsorship for their funding (Hielscher et al., 2017; Mikołajczak, 2017), are forced into a weak position vis-à-vis lead firms, with little to no capacities to transform actual corporate behaviour. Furthermore, as companies may prefer, due to reputational considerations, to purchase anti-trafficking *services* rather than publicly sponsor anti-trafficking initiatives, such initiatives are pushed to offer their services just like for-profit consultancies. Their role, then, revolves primarily around aiding corporations to comply with the Act's requirements, rather than being regarded as stakeholders with the capacity to exert pressures on companies to tackle labour trafficking within their supply chains. Under such circumstances of dependency on corporate funding, far from challenging the power dynamics of the supply chain, anti-trafficking efforts become subsumed into them.

In sum, our analysis shows that the MSA has given rise to an anti-trafficking chain wherein anti-trafficking initiatives are constructed as suppliers catering to the needs of those who source them. Contrary to the explicit intention of the

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MSA, which expects consumers, investors, and NGOs to monitor compliance, no meaningful market-oriented compliance mechanism has emerged, nor has an institutional environment developed with the leverage to inspire and promote significant change in corporate practices. Lastly, our findings indicate that the current arrangements encourage corporations and anti-trafficking initiatives to prioritize compliance with the MSA's minimum requirements only. This suggests that the MSA has not only failed to harden the soft edges of compliance and self-regulatory tools but, in fact, may also have weakened them altogether.

Anti-trafficking Chain Dynamics under the WSR Model

Background

The WSR model positions workers who labour at the bottom of supply chains as active agents in setting and leading the agenda for CSR and provides them with a new form of power within GVCs to protect and enforce their own rights. The model seeks to fill the governance vacuum created by the legal structures, corporate strategies, and financialization of the global economy that constitute 'supply chain capitalism' (Tsing, 2009) and contractually distance capital from the production process and labour through complex value chains and multi-tiered supplier structures. WSR creates direct contractual relations between workers or their representatives and lead firms in a process of multi-party negotiation between the firms, their suppliers, and the workers. The model was developed following the success of the Coalition of Immokalee Workers' (CIW) FFP campaign that significantly improved the working conditions of farm workers in the tomato fields of Immokalee, Florida.

CIW is a grassroots organization made up of farmworkers from Florida's tomato industry (Giagnoni, 2011). The tomato fields in this state were once notorious for their widespread exploitative working conditions, including identified cases of forced labour and modern slavery (Marquis, 2017). The CIW began its organizing effort to improve workers' rights in the early 1990s by demanding that growers – their direct employers – comply with basic rights and refrain from worker exploitation (Estabrook, 2011). When traditional methods failed to transform the harsh working conditions in the fields, CIW members redirected their efforts towards brands at the top of the supply chain. They suspected that pressure exerted on the part of the chain that generated the most profit, while the share taken by the growers – their direct employers – was, in

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fact, shrinking (Asbed and Hitov, 2017), might produce greater leverage. It is this insight that led them to initiate the FFP.

The FFP is a private governance scheme that, through pressure from workers and consumers, induces lead firms (mostly supermarkets and fast-food chains) and growers to sign legally binding agreements. These agreements establish an enforcement method to secure workers' rights by incorporating mechanisms such as Health and Safety committees operating on farms. This enables workers to actively participate in shaping their working environment, thereby guaranteeing worker voice and engagement in the process. The original campaign began in 2001, based on alliances and solidarity between workers and consumer groups – predominantly, student organizations and faith-based communities. Following a long and challenging campaign that included an effective consumer boycott, the first agreement was signed with Taco Bell in 2005 (Leary, 2005; Asbed and Hitov, 2017). Gradually, and not without resistance, other fast-food chains and supermarkets – such as McDonalds, Burger King, Whole Foods, Walmart, and others – joined the FFP.[14] Today, the FFP is widely regarded as a success story that transformed the once-harsh working conditions of farm labourers into a decent and safer work environment (Marquis, 2017).

The FFP programme includes two key elements. The first is a price premium – an additional 'penny per pound' increase in the cost of tomatoes, paid by the buyers (lead firms) and used to increase the wages of workers and help fund the programme and its enforcement mechanisms. The second is a human rights-based code of conduct, for buyers and growers, informed and designed by workers. Among other stipulations, it defines 'zero tolerance violations' – such as sexual violence, physical and gun violence, and forced labour. The code of conduct has proven to be impactful, leading to changes in harvesting and farm practices that have improved workers' lives, wages, and working conditions.

One issue tackled by the FFP, for example, was the long-established practice of obliging workers to overfill the buckets they used to collect the crop (known as 'cupping' or 'topping off'). As they are generally paid per bucket, this practice unjustly created a *de facto* reduction in workers' wages. The FFP eliminates cupping and, as a result, achieves a wage increase of up to 10 per cent (FFSC, 2017: 60). Additional provisions in the code provide workers with shade in the fields and allow for later start times, enabling them to see their families in the mornings and thereby accommodating a better quality of life. Importantly, the FFP's code mandates direct employment of workers by farmers, rather than through labour intermediaries who, within the power structure of supply chains, often take advantage of farmworkers' vulnerability to severe

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exploitation (Estabrook, 2011; Marquis, 2017; Dias-Abey, 2019a). These elements are accompanied by important complementary components: an emphasis on community-building and worker-to-worker education, Health and Safety committees, and the guarantee of worker voice in the workplace.

Crucially, the programme also developed an innovative and elaborate enforcement, monitoring, and sanction process. Given the general failure of other private (as well as public) enforcement schemes to secure vulnerable workers' rights and labour standards (Fine and Bartley, 2019), this process is particularly noteworthy (Marquis, 2023). In 2011, the FFP established a monitoring and enforcement body – the Fair Food Standards Council (FFSC). The FFSC operates as an effective, rigorous enforcement body that conducts external auditing and processes and investigates complaints from workers (Dias-Abey, 2019a). It consists of independent professional investigators who speak the workers' native languages. These investigators spend a significant amount of time in the fields alongside the workers. FFSC's investigations include conversations with at least half of the farm's workforce; system audits of the farm's management and operations; assessment of the grower's compliance with the code; and financial audits of compensation and payroll issues (Brudney, 2016; Marquis, 2017: 123–27).

The auditing system complements the worker complaints hotline, which is operated around the clock by staff who speak Spanish, Haitian Creole, and English. Complaints are processed effectively and efficiently, with over half of them resolved within two weeks (FFSC, 2021: 38–39). The complaint-resolution process prioritizes collaboration and correction. Accordingly, corrective measures, such as suspension from the programme, are collaboratively developed with farms, taking into account their specific situations (Angelini and Curphey, 2022; FFSC, 2021: 8). Overall, functioning as an independent monitoring body and fostering an extensive and efficient operation, the FFSC has created an environment in which workers feel safe to report legitimate complaints without fear of reprisal (Dias-Abey, 2019b).

Together, these different elements of the programme – grassroots organizing, foregrounding worker knowledge and voice, worker-to-worker education, a broad worker–consumer coalition, leveraging the power of lead firms (buyers) over growers, emphasizing buyers' responsibility, binding contracts, and an effective enforcement mechanism backed by economic sanctions – have transformed work for the tomato pickers of Florida. Being recognized as an exemplary programme in addressing workers' rights violations and modern slavery[15] has allowed the FFP to expand to other agricultural products as well

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as to additional growers and buyers in other parts of the US. Concomitantly, while the CIW continues to receive fees from buyers as well as philanthropic donations, its expansion and recognized track record have enabled it to start receiving consultancy fees (Marquis, 2023: 31).

In 2015, the CIW and FFP, alongside other workers' rights organizations, established the Worker-driven Social Responsibility Network (WSR Network). The term 'Worker-Driven Social Responsibility' was chosen to mark and promote the model as an alternative to conventional CSR-based models that centre on corporate-led codes or multi-stakeholder initiatives (MSIs) (Ben-Ozer, 2021; Humphrey et al., 2023). Furthermore, by creating the WSR Network, they explicitly sought 'to develop and implement a strategy to expand the model into other sectors and regions'.[16] To date, the WSR model has been implemented in four industrial and geographic contexts. Examples of such initiatives include, first, the Accord on Fire and Building Safety in Bangladesh, signed in 2013 in response to the Rana Plaza disaster that resulted in the death of over 1,100 workers (Mieres and McGrath, 2021). In 2018, after completing its initial five-year implementation phase, the Bangladesh Accord was extended, with important functions added in anticipation of a move to the hands of a national Ready-Made Garments Sustainability Council. Then, in 2021, it was renewed and updated as the International Accord for Health and Safety, with a national council taking over its operations. By 2023, ten years since it was first established, over 200 signatories had signed the Accord. That same year, inspired by the innovation of the Bangladesh Accord, Pakistan created its own Accord on Health and Safety in the Textile and Garment Industry[17] (Humphrey et al., 2023).

In a second example of an initiative based on the WSR model, the Milk with Dignity Program for dairy farmworkers in Vermont has been in operation since 2017, when Ben and Jerry's became its first signatory (Marquis, 2023). A third example is that of the Lesotho Agreements, signed in 2019, which present a focused adaptation of the WSR model, specifically targeting gender-based harassment and violence in five garment factories in Lesotho (Pillinger, 2022). A fourth example is the Dindigul Agreement. This was established following the murder of Jeyasre Kathiravel, a garment worker, at the hands of her supervisor at Eastman Exports' Dindigul factory. This legally binding agreement aims to end gender-based violence and harassment in the garment industry. It was signed in April 2022 by Eastman, a major clothing and textile manufacturer in Tamil Nadu, India; the Tamil Nadu Textile and Common Labour Union (TTCU); the Asia Floor Wage Alliance (AFWA); and Global Labor Justice – International

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Labor Rights Forum (GLJ–ILRF), with the support of multinational fashion companies HandM, Gap, and PVH (Fudge and LeBaron, 2024).

Other active efforts to implement the WSR model include the Building Dignity and Respect Program, which aims to secure human rights, fair treatment, a safe workplace, and a voice for non-unionized construction workers in the Minneapolis–Saint Paul area of the US;[18] and the partnership between the CIW, the FFP, and the International Transport Workers' Federation. This initiative seeks 'to build and launch a pilot program to identify and combat human rights violations on commercial fishing vessels in the United Kingdom'.[19] In February 2023, FFP's efforts to expand the WSR model globally were recognized and supported by the US Department of Labor, which granted FFP USD 2.5 million for this purpose in international cut-flower farms.[20]

Anti-trafficking Chains under the WSR Model

As a governance mechanism, the WSR approach presents a unique mix of traditional labour union elements and features from more recent models of CSR. Like CSR, WSR relies on consumer and economic pressures to induce lead firms to take on voluntary codes of conduct that they are legally free to abandon at any time, on the unspoken understanding that the decision to abandon a code's requirements carries possible reputational and economic risks.[21] Similar to labour unions, WSR champions workers' voice, leadership, knowledge, and power. Both WSR and CSR also assign the responsibility for workers' rights not only to suppliers but, importantly, to lead firms.

However, some key elements of the WSR model distinguish it from CSR, including its worker-driven process, its focus on effective monitoring and enforcement, and its grounding in legally binding contracts. WSR's key innovation – in response to its primary criticism of existing CSR programmes – is its emphasis on workers' voice in the programmes designed to combat worker exploitation. Speaking to this criticism, Gordon (2017: 4) observes that, 'frequently, the parties most affected by labor codes and MSIs – the workers whose lives are affected by the standards being negotiated – have no say in any part of their design or implementation'.

Another important element that distinguishes WSR from CSR and structurally enables the WSR model to escape the power dynamics inherent to supply chains is the relationship between lead firms and their suppliers. CSR codes often impose requirements on suppliers that, due to their high costs, meet supplier resistance (Anner, 2020; Gordon, 2017). WSR's significant innovation

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to address this flaw is the aforementioned price premium, which places the financial burden on the lead firms instead by requiring them to cover the increase in the workers' wages and contribute to the FFP. Furthermore, in addition to this premium, the WSR model also addresses suppliers' price-squeeze by rewarding suppliers that sign up to anti-exploitation commitments with exclusive sourcing contracts (or long-term commitments) with lead firms. These additional layers of stability and mutual reliance help shift corporations' relationship with suppliers 'from confrontation to collaboration' (Marquis, 2017: 131).

Taking after labour unions, WSR centres on workers' collective voice and agency. However, WSR programmes do not enjoy the traditional protections, or trappings, of labour law. This is the case because labour law is geared towards the dyadic employer–employee relationship, and, therefore, under both individual employment law and collective bargaining law it is suppliers, rather than lead firms, that are the workers' employers and the ones contractually and legally obligated to grant their rights. As a result, neither the codes of conduct nor the contractual relations in the WSR model receive the special contractual force of stability and durability provided in many national laws for collective bargaining agreements (Shamir, 2016). Although negotiations may lead to an enforceable contract (as in the case of the FFP), other elements of the scheme still rely on the voluntary actions of lead firms and, to a large extent, depend on consumer pressures that may fluctuate. Therefore, conceiving of WSR as a form of multi-party collective bargaining within the supply chain is helpful to underscore its 'labour-like' quality while acknowledging the differences.

A key difference between WSR and labour unions is that WSR does not find its power resources and bases of authority in labour law protections – such as those mobilized when organizing collective efforts and strikes – but, rather, in the leverage of worker–consumer coalitions over lead firms. In an age of union decline, and when unions are often characterized as unresponsive to the needs of the most vulnerable workers and ill-suited to changing employment patterns in the global economy, alt-labour organizations such as WSR initiatives seem a more impactful and effective alternative (Fine, 2006; Gordon, 2007; Dias-Abey, 2018). WSR manages to be worker-led yet not bound by the limited restrictions of labour law (such as restrictions on secondary boycotts) and labour politics. The WSR's use of market power frees it from the politics and jurisdiction of any single legal–political context and enables it to thrive even in labour-repressive environments, such as Florida (Fine and Bartley, 2019).

FFP leaders stress the model's independence from state law and politics and its ability to 'address supply-chain problems around the world, largely, although

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not entirely, without regard to international borders or differing legal norms' (Asbed and Hitov, 2017: 526–27). Still, scholars insist on the importance of legal systems to underpin WSR campaigns and mechanisms. Specifically, the ability to enforce contractual obligations is key to providing 'teeth' to the arrangement, and the existence of transparency legislation (and the resulting prosecutions) plays a vital role in addressing severe exploitation, raising public awareness, and pressuring lead firms and growers to join the FFP programme (Dias-Abey, 2019b; Fine and Bartley, 2019). While these sets of rules are external to traditional labour politics and public debates around workers' rights and 'free' markets, they are nonetheless critical to the effective operation of WSR and render the state significant – even if not sufficient – in its design and implementation.

The WSR's most mature and successful case, the FFP, leveraged particular features of the fresh-tomato supply chain to sustain the initiative. First, the market for fresh tomatoes in the US is concentrated around a small number of powerful buyers that are reputation-sensitive (Fine and Bartley, 2019: 269). Second, the State of Florida is the country's biggest producer of tomatoes. It supplies 90 per cent of winter tomatoes in the US (Greenhouse, 2014), making its tomato supply indispensable to restaurants and supermarket supply chains. Third, the tomato supply chain is short – it consists of growers and buyers, and sometimes wholesalers – making it relatively easy to pass the wage premium down the chain, as well as to trace the relationships between buyers and growers (Dias-Abey, 2019b). It also makes it easier for each lead firm to trace labour exploitation throughout its entire chain. In contrast, in more complex supply chains, such as those in global markets, lead firms often claim that it is virtually impossible to gather information on the working conditions of labourers in the lowest tiers. This is complemented by the fourth feature: the supply chain is *domestic*. The fact that tomatoes are produced, sold, and consumed within the US makes it easier to create an 'imagined community' of workers and consumers, allowing for face-to-face meetings and interaction in the solidarity network. Fifth, the geographical concentration of many workers in one location (in this case, Immokalee) facilitated the creation of a strong grassroots mobilization that is strengthened by community meetings, shared life experiences, and direct and personal interaction. Moreover, the FFP evolved from a prolonged organizing campaign, which produced comprehensive knowledge of the chain structure and the needs of workers and other actors within it. Finally, tomatoes are a relatively cheap commodity that is consumed regularly and that some buyers and consumers are willing and able to pay more for, making the 'penny per pound'

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campaign feasible. It may be more difficult to gain buyer and public support in sectors that are more price-sensitive, such as the example of the construction sector discussed earlier.

The same features that enabled the FFP to thrive also make it difficult to replicate. Many of these features are missing from the intricate, multi-tiered, and multi-sited supply chains of other consumer goods (for example, apparel or electronics) (Babineau and Bair, 2020; Brudney, 2021). More geographically dispersed, multi-tiered, competitive, complex, expensive supply chains, or more symmetrical chains (where lead firms are not as well positioned to absorb the wage premium) may require significant adaptation to make the model work. Indeed, even the Bangladesh Accord may require adaptation, as its effectiveness as a governance mechanism has weakened since the transition of its functions to the national Ready-Made Garments Sustainability Council in 2020 and the shift in power from the international union federations and NGOs to national actors, more easily influenced by a lobby of local garment manufacturers (Sarkar, 2023; Champagne, 2021; Kang, 2021; see also Bair et al., 2020). Accordingly, despite the promise and potential of WSR, its success is closely dependent on each particular supply-chain structure and the anti-trafficking chains that can be created in and around it.

Analysis and Conclusion

The analysis of anti-trafficking chains under the first labour governance approach we examined – chains triggered by transparency legislation in the UK – suggests that their lack of proven impact on exploitative labour practices is arguably a result of the positioning and operation of anti-trafficking initiatives and bodies as *suppliers*. First, the minimal demands of the MSA may limit innovations in the anti-trafficking field since it focuses corporate attention on meeting formal requirements based on process rather than content. Fearing intensified liability, and inclined to stick to the minimum standards set in the MSA, corporations produce thin statements that embody few commitments to tangible outcomes. Second, transparency legislation's typical reliance on consumer-based market enforcement mechanisms leads to profoundly imbalanced power relations between anti-trafficking actors and lead firms, in which anti-trafficking efforts are dependent on corporate funding. Therefore, we argue that anti-trafficking transparency legislation might not be merely ineffective but, worse, may undermine anti-trafficking efforts.

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The other labour governance approach considered in this chapter, the WSR model, does appear to create an effective anti-trafficking chain. At its best, it manages to break free of the typical supply chain dynamics, enabling deep and systemic changes in corporate practices and on-the-ground working conditions. The effectiveness of the anti-trafficking chain in the case of the WSR model is a result of the power and authority it derives from a strong and well-orchestrated coalition, led by workers, that is not forced into the position of an 'anti-trafficking service provider'.

The WSR approach creates an anti-trafficking chain that places the workers' organization leading it in a position that gains its strength from being fully internal to the product supply chain. At the same time, the anti-trafficking chain relies on well-informed external power resources, through the worker–consumer coalition that maintains pressure on lead firms and provides the economic incentive to participate in the programme. These dual bases of power and authority enable WSR anti-trafficking chains to challenge, rather than strengthen, the dynamics of the supply chain. Recognizing labour as a decisive element in production (Kumar 2020: 208), the WSR model emphasizes the importance of active worker leadership and involvement. By coupling this approach with targeted consumer pressures, WSR anti-trafficking chains have the potential to operate as effective private supply-chain labour governance mechanisms.

We therefore suggest that WSR offers a third alternative situated somewhere between labour unions and CSR that opens an avenue of institutional imagination and novel possibilities in securing labour rights in supply chains. While WSR can be seen as a form of MSI, unlike traditional MSIs, it is worker-led and includes effective enforcement and monitoring mechanisms backed by legally binding contractual commitments. While WSR can also be seen as a form of union, it does not solely address employers, nor does it necessarily require organizing workers. As such, the WSR model can employ more flexible and innovative strategies. The alternative it offers bestows anti-trafficking chains with the potential to transcend the pendulum-like movement of GVCs' labour governance between de-centring and re-centring the state and to find new power resources in private law (binding contracts), powerful workers' organizations, solidarity networks, and coalitions with workers.

However, despite the great potential effectiveness of WSR, it may prove challenging to replicate and sustain in certain environments (Kunz et al., 2023). First, as we have seen, the WSR model has been implemented in only a few specific contexts and has faced different challenges in each (challenges

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that are beyond the scope of this chapter). Particularly, as evidenced by the recent weakening of the Bangladesh Accord, the WSR model has not yet proven sustainable in global, long, and complex supply chains. Second, the absence of state regulators in the WSR's compliance mechanism is perceived to be an advantage in certain settings due to its potential to empower workers' organizations in hostile political environments, weak states, or transnational settings. However, as in the case of the renewed Bangladesh Accord, a lack of state involvement may prove to be a disadvantage. It may be required especially in contexts characterized by fragile or unattainable intra-organizational and transnational solidarity, lead firms that are immune to consumer and public pressures, or supply chains involving expensive and durable consumer goods (housing, household appliances, computer equipment, and so on) that are associated with high financial risk.

The comparison between anti-trafficking transparency legislation and the WSR model casts doubt on the adequacy and explanatory force of the distinction between soft and hard law in the anti-trafficking field (cf. Karlsson-Vinkhuyzen and Vihma, 2009; Choudhury, 2018). While critiques of soft law underline how it reflects and reproduces power structures and relations, the power dynamics that both facilitate hard law and are facilitated by it are often overlooked. Yet, the two are not so far apart. This is evident, as we have shown, in the power relations at play in shaping the provisions of the MSA. Further, these relations are continuously reproduced in the powerful position of corporations vis-à-vis anti-trafficking services and state agencies in the Act's implementation.

Despite this criticism, we do believe that State Anti-Trafficking legislation has made a significant step in shifting its gaze away from criminal actors as the main perpetrators of human trafficking and criminal law and border control as the main tools to address it. Based on our findings, we contend that State Anti-Trafficking law's ability to draw the attention of policymakers to *corporate* responsibility for severe forms of labour market exploitation – that is, to the structural market conditions under which such modern slavery actually occurs – constitutes positive progress.

However, such a 'soft version of hard law' in the form of the UK MSA would not suffice to counter the forceful supply-chain dynamics that undergird and enable human trafficking across supply chains. The newest European trend of HRDD legislation is admittedly seen as more promising in its potential to lead to a significant change in labour rights within GVCs. But critics note that, to date, the design and implementation of HRDD laws have fallen short in several aspects, including their inadequate corporate liability provisions and their

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limited scope of coverage of the companies to which they apply, the rights they protect, and the reach of the due diligence requirement (Landau and Marshall, 2025). Also of concern is the lack of mandatory requirements to establish institutional platforms for engaging with workers and trade unions, coupled with relatively weak monitoring and enforcement mechanisms (Marshall et al., 2023). We therefore argue that, to effectively address human trafficking, State Anti-Trafficking legislation should intensify the demands placed on lead firms to increase their liability while creating a broader institutional environment that involves governmental bodies, unions, and workers' organizations.

In conclusion, in terms of its proven ability to make a lasting on-the-ground impact and leverage the power structure of the supply chain to drive significant transformation in corporate behaviour, WSR's architecture makes it a promising anti-trafficking governance mechanism compared to State Anti-Trafficking legislation. State Anti-Trafficking legislation has not yet succeeded in challenging the structural dynamics that create and sustain human trafficking in supply chains. In contrast, the current success of WSR programmes in mobilizing corporate behaviour, securing workers' human rights, and improving working conditions is, first and foremost, based on putting workers' agency at the centre. By enhancing workers' capacities to articulate their demands for change in their working conditions, set standards, and monitor corporate compliance, and by backing them with legally binding contracts and enforceable market sanctions, the WSR model, as this chapter has shown, may hold promise as a template for the future of anti-exploitation endeavours. That said, it appears to be incompatible with certain sectors and supply chains. The question then arises as to which normative horizon will shape the continued development of the WSR model. It remains to be seen whether it will continue to leverage the power structure and dynamics of GVCs – specifically, the imbalanced power relations between lead firms and suppliers – to secure labour rights and improve working conditions, or whether it will challenge the fundamental logic of the supply chain model and advance just redistributive mechanisms of the value created throughout the GVC.

Notes

1. While many legislators and scholars favour the term 'modern slavery' to describe severe forms of labour market exploitation, others argue that it limits

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our understanding of the exploitation spectrum and the nuances of coercion it entails (Chuang, 2014; Fudge, 2018; see also Shamir et al., 2025). In this chapter, we adopt the latter stance, and therefore use the term 'human trafficking'. Nevertheless, whenever the original phrasing to which we refer uses the term 'modern slavery', we adhere to it as well.

2. In recent years, to capture the dominance of global brands in shaping labour conditions across GVCs, some scholars have developed the concept of 'monopsony capitalism' (Kumar, 2020; Nathan, 2021; Nathan et al., 2022).
3. TIRAs are also known as global, transnational, or international framework agreements (Hammer, 2005), or transnational company agreements (Schömann, 2012).
4. Framing the WSR model as part of other developments in the field, some scholars refer to it by different terms. For example, Reinecke and Donaghey (2021) discuss WSR as part of a wider 'worker-driven supply chain governance' model. Dias-Abbey (2019b) sees it as an example of what he terms 'supply chain collective bargaining', and Blasi and Bair (2019) discuss it as part of 'multi-party bargaining models for global supply chains'.
5. The notion of the 'anti-trafficking industrial complex' was originally coined by Carol Leigh in the context of sex trafficking. Leigh used this term to refer to the social and financial opportunities opened to individuals and organizations involved in anti-trafficking and, more broadly, humanitarian networks – sometimes at the expense of the victims' best interests (Leigh, 2017).
6. It should be noted that Subsection 54(11) does provide the Secretary of State with the power to seek an injunction against non-compliant organizations.
7. For the Modern Slavery (Amendment) Bill, see https://bills.parliament.uk/publications/41860/documents/390.
8. The CIOB's campaign was launched in Qatar during a meeting of the Members' Forum. For further background, see, for example, www.ciob.org/modern-slavery-to-remain-priority.
9. GLAA website: www.gla.gov.uk/i-am-a/i-use-workers/construction-protocol/.
10. At its peak, there were over 250 signatories to the Construction Protocol, a majority of which were companies in the sector. Arguably, the large number of construction companies among the signatories could be attributed to the fact that the Protocol was initiated by a regulatory agency in the sector. At the time of our research and interviews, there were 147 signatories to the Protocol.
11. See the GLAA website: www.gla.gov.uk/i-am-a/i-use-workers/protocols-make-way-for-business-owned-prevention-activity/.

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12. In contrast, several interviewees mentioned the 'John Lewis beds scandal' as an example of an explosive case that triggered a change in the retail sector. In July 2013, UK media reported that the police found that trafficked men of Hungarian nationality, who were kept in cramped and squalid conditions and paid GBP 10 a week, were employed by a UK bedmaking firm that supplied beds to the John Lewis retail chain, among other companies (BBC News, 2015).
13. On the centrality of modern slavery training programmes in the response of the UK construction sector to the MSA, see also Trautrims et al. (2021).
14. For a full list of the FFP's partners, see https://fairfoodprogram.org/partners/.
15. In 2014, the CIW received the Obama Presidential Award for Extraordinary Efforts to Combat Trafficking in Persons. See the CIW website: https://ciw-online.org/blog/2015/01/presidential-medal-combatting-slavery/ .
16. See the WSR Network website: https://wsr-network.org/about-us/mission/.
17. Pakistan Accord website: https://internationalaccord.org/new-pakistan-accord/
18. WSR/Building Dignity and Respect website: https://wsr-network.org/bdrreport/.
19. International Transport Workers' Federation website: https://www.itfglobal.org/en/news/global-union-federation-leading-labour-based-human-rights-organisation-join-forces-end.
20. US Department of Labor website: www.dol.gov/newsroom/releases/ilab/ilab20230214.
21. Buyers can opt out of the FFP, though this has not yet occurred, or choose not to join if they withstand public pressure. Wendy's is a prime example of a fast-food chain that has so far refused to join the FFP, despite an intensive coalition campaign. See the Boycott Wendy's campaign: www.boycott-wendys.org/.

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