

Special Issue - Following the Money II

Editorial: Rethinking Anti-Trafficking Funding: Following the money, again

Thematic Articles

Anti-Trafficking and the Harm of Funding

Expansion, Fracturing, and Depoliticisation: UK government anti-trafficking funding from 2011 to 2023

US Anti-Trafficking Funding and the Discourse of 'Prevention'

Compounding Institutional Exclusion and Harm: A case study of federally funded Alaskan anti-trafficking service providers

Understanding EU Funding of Anti-Trafficking Initiatives: Where is the money (not) going?

Short Articles

Targeted Funding for Anti-Trafficking Initiatives: An evidence-based anti-oppressive approach

How I as a Fundraiser Would Use Twenty Million Dollars for Anti-Trafficking Work

Pay Survivors for Our Lived Experiences

anti trafficking **•**

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ANTI-TRAFFICKING REVIEW

Special Issue FOLLOWING THE MONEY II

Issue 23, September 2024

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The *Review* is primarily an e-journal, published biannually. The journal presents rigorously considered, peer-reviewed material in clear English. Each issue relates to an emerging or overlooked theme in the field of anti-trafficking.

Articles contained in the *Review* represent the views of the respective authors and not necessarily those of the editors, the Editorial Board, the GAATW network or its members. The editorial team reserves the right to edit all articles before publication.

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ANTI-TRAFFICKING REVIEW

Issue 23, September 2024

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Editorial: Rethinking Anti-Trafficking Funding: Following the money, again

Kiril Sharapov, Suzanne Hoff, Jonathan Mendel, and Borislav Gerasimov

Abstract

This Editorial introduces a special issue of the *Anti-Trafficking Review* that investigates where the funding for anti-trafficking work comes from, goes to, and with what effect. It reflects on some of the changes in funding that have occurred over the past ten years and why it is necessary to research and analyse these changes. It then introduces the articles in the special issue and concludes with suggestions for future research on the topic.

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Following the Money, Again

When we launched the call for papers for a follow-up edition to the 2014 special issue of the *Anti-Trafficking Review*, themed 'Following the Money: Spending on Anti-Trafficking', our goal was to understand anti-trafficking money flows by analysing trends in donor financing, identifying the main beneficiaries of anti-trafficking funding and assessing its outcomes. We aimed to increase accountability of both funders and funding recipients and contribute to a more efficient allocation of anti-trafficking resources that genuinely serve the needs of survivors and at-risk groups. By examining who funds anti-trafficking efforts and who receives and benefits from this funding—and who does not—we hoped to contribute to the critical debate, which questions the familiar narratives portraying all anti-trafficking and anti-slavery initiatives as inherently and unconditionally good.

Critiquing anti-trafficking funding in an academic journal published by one of the largest international alliances of anti-trafficking organisations, the Global Alliance Against Traffic in Women (GAATW), may seem counterintuitive. Most anti-trafficking NGOs, as well as many other actors, rely on external funding to sustain

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their efforts, so they usually call for more resources and support to carry out work that may include identifying and supporting victims, prosecuting criminals, and mitigating risks which make individuals vulnerable to abuse, violence, and exploitation. Yet, beneath these calls lies a challenging reality: a complex web of ideas, actors, and actions. This issue asks how these are funded, for what reasons, by whom, and with what effect on those concerned.

This web extends beyond grassroots organisations to include state institutions, such as immigration authorities, law enforcement agencies, the judiciary, and, increasingly, private for-profit companies operating on behalf of state agencies, all of which play significant roles in anti-trafficking efforts. The influence of these actors can shape anti-trafficking policies and actions in ways that may not always benefit the people they are purported to help. Indeed, not all anti-trafficking initiatives are genuinely beneficial, and some are outright harmful.¹

In planning for this issue and considering the need to scrutinise anti-trafficking funding, we found guidance in Foucault's words: 'The real political task in a society such as ours is to criticise the workings of institutions that appear to be both neutral and independent; to criticise and attack them in such a manner that the political violence which has always exercised itself obscurely through them will be unmasked, so that one can fight against them'. This guidance suggests that the complex and often obscure interplay between various institutions and the broader anti-trafficking landscape must be scrutinised to interrogate the underlying power dynamics and question the neutrality of these institutions. Using anti-trafficking funding as a lens to both study and look through can be a valuable approach here.

The anti-trafficking industry operates within a complex and opaque funding landscape that lacks transparency and accountability. Not enough is known about how much money is allocated, the specific types of anti-trafficking work being funded, who the funders are, and what is ultimately achieved. Despite—or perhaps because of—this limited knowledge, the anti-trafficking industry has continued to expand.³

Government agencies like the US Department of Justice and supranational bodies such as the European Commission, along with private foundations, contribute to

J Mendel and K Sharapov, 'Expanding Circles of Failure: The Rise of Bad Anti-Trafficking, and What to Do About It', *Global Policy Journal*, 18 November 2021, https://www.globalpolicyjournal.com/blog/18/11/2021/expanding-circles-failure-rise-bad-anti-trafficking-and-what-do-about-it.

N Chomsky and M Foucault, *The Chomsky-Foucault Debate: On Human Nature*, The New Press, 2006, p. 41.

³ Mendel and Sharapov, 2021.

a fragmented yet substantial and growing pool of resources aimed at combatting human trafficking. For example, the US Department of Justice increased its funding for services for human trafficking victims and survivors from USD 10 million in 2011 to 98 million in 2023.4 As of 2024, the US Office to Monitor and Combat Trafficking in Persons (JTIP) has, through its International Programs section, 'leveraged more than \$300 million in foreign assistance funding' since 2001 to support over 960 anti-trafficking projects worldwide.⁵ Between 2013 and 2024, the government of the United Kingdom allocated GBP 819 million for antitrafficking work globally, including within the UK.6 The European Commission allocated over EUR 35 million for anti-trafficking projects between 2014 and 2020 and EUR 13 million in 2022 through just two of its funding programmes.⁷ Private foundations also play a significant role, although data on their contributions is less readily available. For example, the Freedom Fund, which describes itself as 'a catalyst in the global effort to end modern slavery, working in the countries and sectors where it is highly prevalent', 8 allocated USD 15.8 million as 'grants to partners' in 2022.9 This proliferation of funding sources and the lack of centralised oversight contribute to the challenges of measuring the effectiveness of anti-trafficking initiatives—and funding.

Since the 're-discovery' of 'modern slavery' in the 1990s, there has been a notable shift in how anti-trafficking activities are funded. Initially, most funding came from government sources. However, over time, private and corporate donors became increasingly involved—a phenomenon known as philantrocapitalism. Private entities have assumed, as Chuang argues, an 'outsized role in a variety of social causes' by drawing on their ability to 'monopolize the market of ideas through their enormous policymaking and agenda-setting powers', including their embrace

Office for Victims of Crime. 'Grants & Funding', n.d., retrieved 26 August 2024, https://ovc.ojp.gov/program/human-trafficking/grants-funding.

⁵ 'About Us – Office to Monitor and Combat Trafficking in Persons', US Department of State, n.d., https://www.state.gov/about-us-office-to-monitor-and-combat-trafficking-in-persons.

A Bhagat and J Quirk, 'Modern Slavery Funding Landscape in the United Kingdom (2013–2024)', Brunel University London. Dataset, 2024, https://doi.org/10.17633/rd.brunel.25291315.v3, sum of column D.

⁷ 'Questions and Answers – Trends, Challenges and Revision of the EU Anti-Trafficking Directive', European Commission, 19 December 2022, https://ec.europa.eu/commission/presscorner/detail/en/QANDA_22_7780. EU member states provide national-level funding as part of their anti-trafficking, law enforcement and victim support actions, or as development aid, but we did not attempt to research these national allocations for this Editorial.

⁸ 'About', The Freedom Fund, n.d., https://www.freedomfund.org/about.

⁹ 'Financials', The Freedom Fund, n.d., https://www.freedomfund.org/about/financials.

of modern-day slavery abolitionism.¹⁰ The privatisation of concern for specific human trafficking victims has created a marketplace where philantrocapitalists and governments supply targeted funding, driven by their own ideas of (un) fairness and (in)equality.¹¹ These funds are often allocated in response to specific types of demand that may not necessarily come from survivors themselves, but from service providers who determine the scale and nature of the assistance and prevention services they are prepared to offer.

In addition, a significant amount of funding, particularly in the US, also comes through religious organisations, churches, and individual donations. This type of funding, which appears to be substantial, operates in problematic and often unaccountable ways, further complicating the landscape of anti-trafficking donors.

In this context, a key question for those funding anti-trafficking efforts should be whether their financial support challenges or perpetuates existing systems of political and economic exploitation. These systems, rooted in expanding global inequality, continually create the conditions that render people vulnerable to exploitation. Simplistic public messaging reinforces the false belief that increased donations alone will solve the issue, perpetuating a cycle where vulnerable populations remain at risk—or are placed at greater risk—while charitable organisations prosper.

Exploring What We Know—and Don't Know—about Anti-Trafficking Funding

We circulated the call for papers for this issue in March 2023, listing a range of potential questions with which contributors could engage. These included assessments of how much funding was available for anti-trafficking work at national or regional levels, or allocated by individual grant-makers, with specific attention paid to the criteria, priorities, and interests embedded in the donors' funding decisions. Several contributions in this issue address this question, including those by Hebert, Rothchild *et al.*, Rossoni, and Sharapov *et al.*

J A Chuang, 'Giving as Governance? Philanthrocapitalism and Modern-Day Slavery Abolitionism', UCLA L. Rev., issue 62, 2015, pp. 1516–1556. See also J Chuang and E Shih (eds.), Philanthrocapitalism and Anti-Trafficking, Beyond Trafficking and Slavery/openDemocracy, London, 2021.

Many of the states and corporations supporting global anti-trafficking initiatives have chequered human rights and labour practice records, including, for example, Belarus, Saudi Arabia, and Bahrain. Some would argue that this list should be extended to include countries like the United Kingdom and the United States.

We were also keen to find out how and by whom the funding priorities were decided and whether they responded to the needs of the populations who were supposed to benefit from them. While there is an increased emphasis on engaging people with lived experience and establishing organisations to support this engagement, questions remain about whether the funding truly reaches survivors or if they are once again exploited for others' interest, including financial gain. In this issue, Tamara MC, a survivor of trafficking, highlights the exploitation of survivors' labour in anti-trafficking work, emphasising that all survivors involved in anti-trafficking efforts should be compensated for their work and offered pay rates commensurate with other expert consultants. The contribution by Rothchild *et al.* provides a clear example of how anti-trafficking funding does not always reach those who need it. On the other hand, the contribution by Nichols and Preble describes how anti-trafficking funders can utilise community-driven research on survivors' needs, demographics, and experiences to inform their funding decisions.

We also invited potential contributors to share evaluations of the effectiveness or impact of anti-trafficking funding, given that it runs in the millions of dollars at the level of individual donors and in the hundreds of millions at the national level in some countries. Unfortunately, we received no submissions that focus specifically on the impact of anti-trafficking funding. We are not aware of any systematic and transparent research initiatives that scrutinise the efficiency of anti-trafficking spending at the national level or at the level of a major donor or grant-maker.

Another broad area of interest was the impact of funding priorities on the receiving organisations and, from a broader angle, how funding allocations reinforce specific representations of human trafficking in both policy and practice. In this regard, several contributions in this issue reflect on policy representations, including Sharapov *et al.*, who examine how the UK government allocates anti-trafficking funds to support its strategy of preventing unauthorised migrants from reaching the UK border. Continuing the focus on the UK, Findlay explores how anti-trafficking funding is distributed to profit-making contractors, which harms those it was intended to help and contributes to broader anti-immigrant narratives and practices. Hebert's analysis of US government anti-trafficking funding shows that only a small fraction goes towards addressing the conditions that increase precarity, and it is directed primarily to countries in the Global South. Gupta critiques the ways in which popular representations of trafficking

There remains significant uncertainty about 'what works' in addressing human trafficking more broadly, and 'organizations are still struggling to demonstrate impact and discern what works to combat human trafficking'. K Bryant and T Landman, 'Combatting Human Trafficking since Palermo: What Do We Know about What Works?', *Journal of Human Trafficking*, vol. 6, issue 2, 2020, pp. 119–140, https://doi.org/10.1080/23322705.2020.1690097.

(such as in film and media) impact policy and funding. However, no contributions assessed the impact of cultural and political influences apparent in funding allocations on organisations that compete for and accept funding from sources, including national governments, which may be involved in or profiting from the impoverishment of vulnerable individuals.

Inspired in part by work on police and prison defunding and abolition, there has been increasing discussion of defunding activity in other sectors, particularly when this activity involves the use of 'legitimate' force. ¹³ The idea of defunding the antitrafficking industry—and the possibility that defunding other government activity might benefit trafficked people and those at risk of exploitation—is developed in this issue by Sharapov *et al.* and Findlay, who point to the harms of the UK immigration system. Future work on defunding the anti-trafficking industry could similarly explore which other parts of the sector are ineffective or harmful and should be defunded, and how this might achieve more radical structural change.

Scholars and activists discussing defunding are often asked to account for what should be done with the money saved. This question does not necessarily need to be answered prior to defunding: stopping spending money on harmful activities would be worthwhile even if there is no plan for what to do with the money saved. Yet, it remains a relevant question that would benefit from additional work. In this issue, Findlay advocates for shifting funds to community building and 'decentralised support networks', while Sharapov *et al.* suggest possibilities ranging from funding a better welfare system to an unconditional basic income.

Alongside this discussion of defunding and critiques of spending in the anti-trafficking sector, we wanted to understand what those within the sector saw as the best use of funds. In informal conversations with anti-trafficking NGOs in Europe about examples of best practices, they highlighted that funds should directly support the assistance, protection, and empowerment of victims as well as judicial measures against exploiters, and address the structural root causes of trafficking and exploitation, all of which, in turn, would help prevent human trafficking. They stressed that compared to funding for think tanks, research, capacity building, and costly conferences and projects without concrete outcomes, very little funding is made available for support services. They also recommended that donors provide direct and flexible support to NGOs instead of channelling funding through intermediaries.

¹³ Mendel and Sharapov, 2021.

This Special Issue

While working on this issue, we encountered several 'roadblocks'. Some of the disappointments about the state of knowledge about anti-trafficking funding, as raised by the then-guest editor Mike Dottridge in 2014, 14 could easily be echoed in this editorial. For some contributors, identifying the best approach to analysing anti-trafficking spending proved challenging. They had to decide whether to describe how much is being spent and where the money is allocated, considering the lack of public information on anti-trafficking spending. Others grappled with assessing the funding's overall effectiveness, given the absence of systematic, valid, and reliable evaluations of what funded anti-trafficking activities actually achieve. For some, it was difficult to assess how funding is used to push specific anti-trafficking agendas, and at what level—organisational, national, regional, or international, or through selective funding arrangements. Ironically, we have observed that research on anti-trafficking funding does not tend to be well-funded compared to other areas, which can limit the resources to do this work.

The final selection of articles in the special issue includes five full-length research articles and three short ones, all focusing on the United Kingdom, the United States, and the European Union. **Joshua Findlay** argues that UK government anti-trafficking funding is mostly used in harmful ways. Based on extensive research into the UK National Referral Mechanism (NRM) and interviews with anti-trafficking practitioners, he demonstrates the clear links between the NRM and other arms of the immigration system, which lead to impoverishment and desperation for victims of trafficking and many migrants and asylum seekers. Findlay concludes by calling for the defunding of the NRM and organising through community building.

In a similar vein, Kiril Sharapov, Jonathan Mendel, and Kyle Schwarz argue that defunding government activities that render people more vulnerable to exploitation could significantly contribute to anti-trafficking efforts. Their analysis of UK government anti-trafficking funding from 2011 to 2023 finds that 'anti-trafficking policy discourses and funding trajectories in the UK are developing and expanding in a fractured way'. Funding largely focuses on individual 'victims' and 'criminals' within the UK, while funding for projects outside the UK may attempt to address structural issues, but these are largely presented as external to the UK. The authors highlight that the focus on the rights of people 'at risk' of trafficking outside the UK has coincided with UK government attacks on the rights of migrants within the country.

M Dottridge, 'Editorial: How Is the Money to Combat Human Trafficking Spent?', *Anti-Trafficking Review*, issue 3, 2014, pp. 3–14, https://doi.org/10.14197/atr.20121431.

Laura Hebert's analysis of US government funding (2017–2021) finds that it is largely spent on reactive work, ranging from support for survivors to crime prevention. Similarly to Sharapov *et al.*, she finds that projects targeting the conditions that render people vulnerable to exploitation were relatively underfunded, receiving less than 20 per cent of total US government funding. Furthermore, all these projects were focussed on and framed around perceived problems in the Global South.

Next, **Tatiana Rothchild, Ajela Banks, and Tara Burns** review the antitrafficking grants distributed by the US Office for Victims of Crime between 2004 and 2023, with a special focus on the state of Alaska. They present this data against the experiences of a young Black trafficking survivor (one of the co-authors) who was refused help by several federally funded organisations in the state. The authors critique government funding requirements that prioritise institutional processes and collaboration with law enforcement but fail to protect or empower survivors.

In the last of the five research articles, **Isotta Rossoni** provides an overview of anti-trafficking funding allocated through several programmes of the European Commission in the 2014–2020 programming period. She describes the types of projects and organisations funded, the countries involved, and the amounts awarded. She also presents the findings of a survey of twenty European organisations working in the anti-trafficking field, which aimed to understand their experience with applying for EU funding. Many organisations expressed frustration with the complex and bureaucratic application process and the heavy administrative requirements. Some also felt that they were refused funding because their organisational understanding and approaches to human trafficking differed from those of the European Commission.

In the short articles section, **Andrea J. Nichols and Kathleen M. Preble** describe how a group of anti-trafficking funders in the US State of Missouri developed a strategic plan to guide their funding decisions based on community-driven research into the characteristics, experiences, and needs of survivors. The authors call for big picture responses that address the root causes of exploitation and for funding organisations that employ anti-oppressive practices in their anti-trafficking work.

The last two articles address the question that we posed in the call for papers: What would be the best use of twenty million US dollars for anti-trafficking work?' **Kiran Gupta**, drawing on her experience in fundraising and communications at a US anti-trafficking NGO, proposes to use USD 20 million for narrative change work. She argues that film and media in the US present distorted pictures of human trafficking, which impede successful anti-trafficking actions. Therefore, this money would be used for the creation of thoughtful and nuanced representations of human trafficking, with the active collaboration of survivors.

Tamara MC concludes the issue by highlighting the common problem of survivors working in the field not being adequately compensated for their skills and expertise. A trafficking survivor herself, she argues that the best use of USD 20 million is for organisations that hire survivors as consultants, trainers, or speakers to pay them appropriately.

Conclusion

This special issue contributes to the task of revealing and critiquing the political violence of many broadly accepted institutions and aspects of the anti-trafficking industry. The papers map out key contours of anti-trafficking funding—particularly in the UK and the US—and offer suggestions for more productive uses of this money. The special issue also opens up some important questions for future research. There remains a critical need for more research on anti-trafficking funding in the Global South, where the impact of funding decisions and the role of local and foreign actors seem to be overlooked or insufficiently addressed in the existing research. Likewise, more research is needed into the impact of anti-trafficking funding provided by corporations, religious organisations, and individual donors.

The discussion of the harms caused by anti-trafficking funding and practice raises questions about whether these issues are better addressed through defunding or by changes within the sector, and how these might work in practice. The contributions here offer both critiques of the sector and suggestions for future areas of better spending and practice to research. Additionally, the role of survivors also arises here in novel ways—particularly in terms of how funding can address their needs and the importance of the anti-trafficking sector paying survivors fairly for their work.

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Thematic Articles: FOLLOWING THE MONEY II

Anti-Trafficking and the Harm of Funding

Joshua Findlay

Abstract

This article argues that the UK government's anti-trafficking funding is mostly harmful, because anti-trafficking emulates and extends other arms of the immigration system—a system financed to engage in practices of impoverishment. After explaining the *slow violence* at work in the asylum system, I show that UK anti-trafficking work expands the reach and extends the length of that impoverishment. I finish by making two recommendations: defunding government anti-trafficking work and organising through community building.

Keywords: modern slavery, bureaucracy, funding, slow violence, NRM, impoverishment

Suggested citation: J Findlay, 'Anti-Trafficking and the Harm of Funding', *Anti-Trafficking Review*, issue 23, 2024, pp. 11-33, https://doi.org/10.14197/atr.201224232

Introduction

While doing my doctoral research on the anti-trafficking sector, I volunteered at a drop-in service run by the Salvation Army. During the first COVID-19 lockdown, we moved our client sessions onto Zoom. After a while, the local programme coordinator told the volunteers that because of the reduced costs of running the service, there was a pot of money available. She asked if we had any ideas for what to do with it. I suggested we distribute it as cash payments to the service's clients. The response was immediate—there was no way we could do that. She did not think it was a terrible idea, she just knew that such a suggestion would certainly not be given the green light by those she answered to. I was not surprised by the response, and if we consider anti-trafficking funds within a wider context, we can see why.

This article makes the counterintuitive argument that the United Kingdom (UK) government's funding for anti-trafficking is more harmful than helpful. To explain why, I discuss the role of bureaucracy—in particular, an expanding apparatus of criminalisation—in the production of inequality and impoverishment.

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This includes a burgeoning 'industry' of immigration controls, including the humanitarian sector, financed through government contracts.

The article then turns to the equivalency between UK anti-trafficking and other arms of the immigration system. In particular, I build on Lucy Mayblin's argument that the asylum system is a process of *slow violence* and intentional impoverishment.¹ Drawing on my doctoral research, ² I show that rather than ameliorating the harms of the immigration system, the National Referral Mechanism (NRM) expands the reach and increases the duration of that impoverishment (delegitimising some asylum claims in the process), while the growing bureaucratic apparatus is funded through more contracts, worth hundreds of millions of pounds.

After demonstrating how government-financed anti-trafficking enacts slow violence through its decision-making processes and the kinds of work it does and does not fund, I support the anti-bureaucratic arguments of the article with two recommendations: de-funding the NRM and organising support through community building.

Bureaucracy and Inequality

In this era of rising debt and inequality, the expansion of bureaucracies has been a common way of spending money, extracting wealth and stabilising power, (re)producing inequality and impoverishment.³ A particularly significant form of bureaucratic expansion is the policing and penal system. The apparatus of criminalisation functions to produce neoliberal policies like deregulation and reduced welfare and to control the people that are targeted by these policies.⁴ In the UK, as elsewhere, criminalisation and administration have been imposed

¹ L Mayblin, *Impoverishment and Asylum: Social policy as slow violence*, Routledge, Abingdon, 2020.

J Findlay, Putting the 'Slave' in 'Anti-Slavery': A critical analysis of the UK National Referral Mechanism, Doctoral thesis, University of Salford, 2023, https://salford-repository.worktribe.com/output/1561926.

D Graeber, The Utopia of Rules: On technology, stupidity, and the secret joys of bureaucracy, Melville House Publishing, New York, 2015; D Graeber, Bullshit Johs: A theory, Penguin, London, 2018.

M Alexander, The New Jim Crow: Mass incarceration in the age of colorblindness, The New Press, New York, 2010; A Karakatsanis, 'The Punishment Bureaucracy: How to think about "criminal justice reform", The Yale Law Journal Forum, vol. 128, 2019, pp. 848-935; L Wacquant, 'The Penalisation of Poverty and the Rise of Neo-Liberalism', European Journal on Criminal Policy and Research, vol. 9, 2001, pp. 401-412, https://doi.org/10.1023/A:1013147404519; L Wacquant, Punishing the Poor: The neoliberal government of social insecurity, Duke University Press, Durham, 2009.

through a growing apparatus of enforcement that has itself become profitable through privatisation, often receiving substantial government contracts to run and expand the use of prisons, security and pertinently, immigration controls.⁵ Across Europe, an array of stakeholders, including border forces, police, international organisations, defence contractors, policy institutes, humanitarians and NGOs, are funded to facilitate and prevent the movement of people. Privatisation has opened up markets for private companies to profit from anything, from asylum accommodation to detention centres and deportation flights.⁶

This industry is further fuelled by media that insists we must increase border controls to defend the country from immigrants who are presented as cultural and economic threats,⁷ while the narratives provided to employees within this industry encourage them to believe that by 'securing the border', they are making the UK a safer place and responding to 'national priorities'.⁸ Yet the growth in immigration has occurred within the context of mounting immigration controls,⁹ and attempts to curtail migration have produced more problematic forms of 'illegal migration', which the same industry insists must be responded to with more funds for border security.¹⁰ As I will illustrate, rather than serving a wider social and economic benefit, the expanding bureaucratic apparatus lowers efficiency and increases harm.-

M Bhatia and V Canning, 'Misery As Business: How immigration detention became a cash-cow in Britain's borders', in K Albertson, M Corcoran and J Phillips (eds.), Marketisation and Privatisation in Criminal Justice, Policy Press, Bristol, 2020, pp. 262-277; A S Day and S O McBean, Abolition Revolution, Pluto Press, London, 2022; T Gammeltoft-Hansen and N Nyberg Sørensen, The Migration Industry and the Commercialization of International Migration, Routledge, Abingdon, 2013.

L Arbogast, Migrant Detention in the European Union: A thriving business, Migreurop, Rosa Luxemburg Stiftung, 2016; J Darling, 'Asylum in Austere Times: Instability, privatization and experimentation within the UK asylum dispersal system', Journal of Refugee Studies, vol. 29, issue 4, 2016, pp. 483-505, https://doi.org/10.1093/jrs/few038; Corporate Watch, 'Air Partner: The Home Office's little-known deportation fixer', Corporate Watch, 6 January 2023.

J Tong and L Zuo, 'Othering the European Union Through Constructing Moral Panics Over "Im/migrant(s)" in the Coverage of Migration in Three British Newspapers, 2011-2016', *International Communication Gazette*, vol. 81, issue 5, 2019, pp. 445-469, https://doi.org/10.1177/1748048518802237.

⁸ Home Office, 'Immigration Enforcement', Home Office, 2022, https://careers. homeoffice.gov.uk/role/frontline-and-operational/immigration-enforcement.

⁹ C Gilligan, 'The Public and the Politics of Immigration Controls', *Journal of Ethnic and Migration Studies*, vol. 41, issue 9, 2015, pp. 1373-1390, https://doi.org/10.1080/1369183X.2015.1021584.

R Andersson, 'Europe's Failed "Fight" Against Irregular Migration: Ethnographic notes on a counterproductive industry', *Journal of Ethnic and Migration Studies*, vol. 42, issue 7, 2016, pp. 1055-1075, https://doi.org/10.1080/1369183X.2016.1139446.

While critical literature long ago concluded that anti-trafficking work is integrated into and contributes to the violence of immigration systems, ¹¹ such conclusions are not usually applied in literature that discusses the centrepiece of the UK anti-trafficking framework, the National Referral Mechanism. For instance, while the Anti-Trafficking Monitoring Group (ATMG)¹² critiques the way the NRM is affected by anti-migrant politics, its recommendations still advocate for measures that scholars have shown perpetuate harm, ¹³ like anti-trafficking identification and protection measures at 'all UK borders' and more 'unified' NRM data collection, ¹⁴ both of which bolster immigration control. ¹⁵ The NRM is nominally the system for identifying, referring and supporting victims of what has been termed in the UK 'modern slavery'. Government departments and agencies, police forces, local authorities and some charities function as first responders—those authorised to refer 'potential victims' into the system. While the Home Office gathers evidence to decide whether someone is a 'genuine victim', support provisions are outsourced to the Salvation Army and an array of subcontracting organisations. ¹⁶

As the ATMG's recommendations exemplify, the NRM is typically framed by the anti-trafficking sector as separate from, but subordinated to, the immigration system. That is, key aspects of the NRM, like victim identification, data gathering and support services, are discussed as factors positively intended for emancipatory purposes but which are limited or harmed by immigration control agendas, rather than as activities that extend immigration controls because of the bordering

B Anderson and R Andrijasevic, 'Sex, Slaves and Citizens: The politics of antitrafficking', *Soundings*, vol. 40, 2008, pp. 135-145; W Chapkis, 'Trafficking, Migration, and the Law: Protecting innocents, punishing immigrants', *Gender and Society*, vol. 17, issue 6, 2003, pp. 923-937, https://doi.org/10.1177/0891243203257477; J O'Connell Davidson, 'New Slavery, Old Binaries: Human trafficking and the borders of "freedom", *Global Networks*, vol. 10, issue 2, 2010, pp. 244-261, https://doi.org/10.1111/j.1471-0374.2010.00284.x; N Sharma, 'Travel Agency: A critique of antitrafficking campaigns', *Refuge*, vol. 21, issue 3, 2003, pp. 53-65, https://doi.org/10.25071/1920-7336.21302.

¹² A coalition of organisations working in the UK anti-trafficking sector.

N Sharma, "The New Order of Things": Immobility as protection in the regime of immigration controls', Anti-Trafficking Review, issue 9, 2017, pp. 31-47, https://doi.org/10.14197/atr.20121793.

ATMG, Before the Harm is Done: Examining the UK's response to the prevention of trafficking, ATMG, 2018.

B Anderson, Us and Them? The dangerous politics of immigration control, Oxford University Press, Oxford, 2013; C Aradau, 'Human Trafficking Between Data and Knowledge', Keynote talk for the conference on 'Data Protection and Right to Privacy for Marginalized Groups: A new challenge in anti-trafficking policies', Berlin, 25-27 September 2013.

¹⁶ Home Office, National Referral Mechanism Guidance: Adult (England and Wales), Home Office, 2024.

nature of anti-trafficking work. This has a problematic effect on evaluations of the mechanism, as the harms of the NRM are commonly externalised onto an immigration system that is seen as separate. As Waite et al. have recently discussed in their study of the effects of the government's anti-migrant agenda on antitrafficking care providers, the NRM is much more integrated into border violence than the anti-slavery sector's grey literature usually suggests. Government-funded support organisations are brought into close relationship with the state and typically feel unable to challenge or obstruct imperatives of the immigration system. The common, pragmatic approach of frontline workers embeds organisations into statist, bureaucratic structures.¹⁷ As this article will show, funding for anti-trafficking work is not seen for what much of it is: funding for the expanding apparatus of the immigration system. Of the many equivalencies between UK anti-trafficking work and other arms of immigration control, I will focus on the most pertinent example to the present discussion: the role the NRM has played in exacerbating the impoverishment already subversively at work in the asylum system, and the way the inefficiency of these systems is proving profitable.

Methodology

This article draws on my doctoral research on the UK National Referral Mechanism. Given existing evidence of harms caused by the NRM, ¹⁸ its facilitation of harms caused by other parts of the immigration system, ¹⁹ and evidence of resistance to entering the NRM, ²⁰ the research primarily aimed to discover how and why increasing numbers of people were entering into and staying in the mechanism.

A charity facilitated interviews with two participants who had been through the NRM and confirmed as 'victims of modern slavery'. I conducted both interviews. Neither of them knew what the NRM was and therefore did not specifically recall the circumstances of their referrals. The normality of this was affirmed by existing work²¹ and by participants in this research, like a support worker I interviewed: *People I work with...have no idea what the NRM is...they don't know they've been entered into it...I'd say, I've experienced like at least 50% of people don't know they're*

¹⁷ L Waite *et al.*, 'Faith, Bordering and Modern Slavery: A UK case study', *EPC: Politics and Space*, 2023, pp. 1-17, https://doi.org/10.1177/23996544231212208.

ATMG, The National Referral Mechanism: A five-year review, ATMG, 2014; A Sharp and N Sedacca, Dignity, Not Destitution, Kalayaan, 2019.

¹⁹ ATMG, In the Dock: Examining the UK's criminal justice response to trafficking, ATMG, 2013.

Home Office, Modern Slavery: National Referral Mechanism and Duty to Notify statistics UK, end of year summary 2023, Home Office, 2024.

²¹ JRS, Survivors of Trafficking in Immigration Detention, Jesuit Refugee Service, 2019.

being entered into it. 'The research was focused on explaining how and why people were entering into the NRM. Interviewing people who did not know what the NRM was and the specific factors of their own referrals, suggested such interviews were less likely to reveal details about the causes of referrals. There was already a significant degree of caution and refusal among charity gatekeepers to facilitate the interviews because of the stress interviews can cause survivors. Recollecting past harm can cause distress,²² and one of the two survivor participants did experience distress in the interview. Given these factors, I ceased requesting interviews with those who had been referred into the NRM and increased the number of practitioner interviews.

These participants were mostly recruited through heterogenous purposive sampling, to include a diversity of roles from different parts of the NRM. People were approached directly wherever possible, rather than through their organisations, usually through direct emails, with the hope of reducing the extent to which practitioner interviews were selected and mediated by organisation administrations. Two participants were introduced to me by other participants. Practitioner interviews were conducted throughout 2020. Ethical clearance for the survivor and practitioner interviews was given by the University of Salford prior to the interviews taking place. Anonymity was assured in participant information sheets and reaffirmed verbally prior to interviews. Identifying details were removed in the published work following data collection. Where details like organisational affiliations could not be hidden, these were discussed and agreed with the participant. Interview questions were removed if participants wanted to avoid certain topics.

Twenty theoretically informed, in-depth, semi-structured interviews were conducted with: two people who had been through the NRM, two NRM decision-makers, two police detectives, two border force officers, two people in social work roles in local councils, two NHS doctors involved in modern slavery and human trafficking (MSHT) training, a legal aid solicitor, an advisor to migrants, a senior staff member at the Salvation Army (which holds the government care contract for adults in the NRM), a senior advisor at the Modern Slavery Helpline and four people directly involved in support work, one of whom then worked in a police training and networking role. Practitioner interviews focused on the values, opinions, and practices of the participants. All practitioner interviews were conducted through online video calls or phone calls.

J-P Legerski and S L Bunnell, 'The Risks, Benefits, and Ethics of Trauma-Focused Research Participation', *Ethics and Behaviour*, vol. 20, issue 6, 2010, pp. 429-442, https://doi.org/10.1080/10508422.2010.521443.

Both interview design and analysis were shaped by theoretical perspectives on the NRM, which in turn shaped my interpretation of findings. Existing evidence on the NRM²³ conformed to discussions of other areas of immigration control²⁴ and intersected with other parts of the immigration system.²⁵ Widespread resistance to the NRM, already recorded²⁶ and described²⁷ in the literature, was logically explained by research on undocumented people's resistance to immigration controls and the police²⁸ and even frontline services.²⁹ There is also broader literature on the normality of everyday resistance that people have always shown to the controlling practices of statist projects.³⁰ Though evidence of such resistance appeared in my findings, my analysis was already premised on these ideas, and focused instead on the questions of how and why people were being entered into the NRM, and what motivated frontline staff to facilitate the mechanism given these factors.

ATMG, Time to Deliver: Considering pregnancy and parenthood in the UK's response to human trafficking, Anti-Slavery International, 2016; J Gallagher and J Featonby, Hope For the Future: Support for survivors of trafficking after the National Referral Mechanism. UK integration pilot - evaluation and policy report, British Red Cross, 2019; UK Government, Victims of Modern Slavery: Government response to the committee's twelfth report of session 2016-17: Fourth special report, House of Commons, 2017.

P Hynes, 'Contemporary Compulsory Dispersal and the Absence of Space for the Restoration of Trust', *Journal of Refugee Studies*, vol. 22, issue 1, 2009, pp. 97-121, https://doi.org/10.1093/jrs/fen049; Mayblin, *Impoverishment*; N Yuval-Davis, G Wemyss and K Cassidy, 'Everyday Bordering, Belonging and the Reorientation of British Immigration Legislation', *Sociology*, vol. 52, issue 2, 2018, pp. 228–244, https://doi.org/10.1177/0038038517702599.

After Exploitation, Supported or Deported? Understanding the deportation and detention data held on human trafficking and slavery, After Exploitation, 2019.

Independent Chief Inspector of Borders and Immigration, An Inspection of Border Force's Identification and Treatment of Potential Victims of Modern Slavery, ICIBI, 2017.

²⁷ K Hadjimatheou and J Lynch, 'UK Anti-Slavery Policy at the Border: Humanitarian opportunism and the challenge of victim consent to assistance', *European Journal of Criminology*, vol. 17, issue 5, 2020, pp. 678-698, https://doi.org/10.1177/1477370 818820645.

A Bloch, N Sigona and R Zetter, Sans Papiers: The social and economic lives of young undocumented migrants, Pluto Press, London, 2014; A Ellermann, 'Undocumented Migrants and Resistance in the Liberal State', Politics and Society, vol. 38, issue 3, 2010, pp. 408-429, https://doi.org/10.1177/0032329210373072.

F Thomas, P Aggleton and J Anderson, "If I Cannot Access Services, Then There is No Reason for Me to Test": The impacts of health service charges on HIV testing and treatment amongst migrants in England', *AIDS Care*, vol. 22, issue 4, 2010, pp. 526-531, https://doi.org/10.1080/09540120903499170.

J C Scott, Weapons of the Weak: Everyday forms of peasant resistance, Yale University Press, New Haven, 1985.

The analysis followed a broadly thematic approach.³¹ I transcribed all interviews, making extensive notes and attaching code labels to the text, including both latent and semantic themes. Some codes were drawn from theoretical insights on the NRM, while others emerged during interviews and analysis. Analysis began while interviews were still being conducted. In thematic analysis, writing is an integral part of the analysis and not just something that happens at the end. In-depth notes included reflections on how the extract contributed to planned and emerging themes.

I did not focus the research on either minors or UK nationals. Consent is not required for minors to be referred into the NRM, so the dynamics of their referrals are significantly different, and participants affirmed that the NRM support was not targeted at either of these groups. These practitioner interviews are considered in the context of the NRM as it was when I conducted them in 2020. However, in this article, I also discuss the significance of recent changes in UK immigration legislation and NRM policy and the increasing number of UK nationals being referred into the system.

Slowing Down the Slow Violence

Lucy Mayblin's important examination of the asylum system has shown that the housing and support provided should not be conceptualised as an uncomplicated positive in the midst of evidently harmful negatives.³² Rather, her work (which focuses on the UK but describes a more widespread phenomenon) carefully shows how the discourse on asylum seekers has shifted from humanitarian or political constructions to an economic one, in which policies are designed to avoid functioning as 'economic pull factors' that encourage more immigration and asylum applications. Even though there is no evidence to support the notion that a country's reception policies affect levels of asylum applications, this logic has turned the asylum system into a purposeful process of gradual impoverishment. Most asylum seekers do not expect to be prevented from working or to be made dependent on asylum support, yet these realities create for people a state of constant stress, anxiety, shame, and poverty. Utilising Nixon's concept of *slow violence*,³³ Mayblin describes the structural harms that are gradual, out of sight, and that perpetrate a delayed destruction that is stretched out over space and time. Rather than asylum being a positive agenda with unintended negative

V Braun and V Clarke, 'Using Thematic Analysis in Psychology', *Qualitative Research in Psychology*, vol. 3, 2006, pp. 77-101, https://doi.org/10.1191/1478088706qp0630a.

³² Mayblin, *Impoverishment*.

³³ R Nixon, *Slow Violence and the Environmentalism of the Poor*, Harvard University Press, London, 2011.

consequences, policies that claim to help, support, and protect asylum seekers are actually doing serious harm.

The equivalency of the asylum system with the NRM is unsurprising, as the two systems share much in common. It is evident in government claims, for instance, that a positive conclusive grounds decision³⁴ cannot come with a guaranteed period of discretionary leave, 35 because '[t]he Government believes that having a blanket policy of granting discretionary leave to all victims risks incentivising individuals to make false trafficking claims in an attempt to fraudulently obtain leave to remain or delay removal'.36 This refusal to give conclusively identified victims of modern slavery the very thing many of them need most is dismissed for exactly the reasons Mayblin raises—the system is not supposed to be pleasant or helpful because to be so would be incentivising the 'undeserving'. The increasing hostility, the numerous categorisations and the fractioning of protection systems are confusing for those within these mechanisms, whose vulnerability to exploitation and distrust of authorities can be increased by bureaucratic delays.³⁷ With few exceptions, being in the NRM does not give someone any right to work they did not already possess. Without that right, people in the mechanism are drawn into destitution, while uncertainty over immigration status exacerbates emotional and mental health conditions, feelings of worthlessness and the sense that they are being 'punished by a system meant to protect them'.38

Crucially, the asylum and NRM processes do not happen in tandem. Rather, the asylum process is put on hold, sometimes for years, until the conclusive NRM decision has been made. Many people do not receive positive conclusive grounds decisions, and those that do will not necessarily receive any status as a result.³⁹ Nevertheless, all will have their asylum decision delayed by their entrance into the NRM. Indeed, there now exists a potential 'disqualification decision' to be made

The final government decision confirming whether someone is recognised as a 'victim of modern slavery'. The first government decision is called a 'reasonable grounds decision'.

Discretionary leave is a policy sometimes enabling people to remain temporarily in the UK when they are otherwise unable to obtain immigration status.

³⁶ UK Government, Victims of Modern Slavery, p. 4.

P Hynes, 'Exploring the Interface between Asylum, Human Trafficking and/or "Modern Slavery" within a Hostile Environment in the UK', *Social Sciences*, vol. 11, issue 6, 2022, https://doi.org/10.3390/socsci11060246; Waite *et al.*

³⁸ C Beddoe, L Bundock and T Jardan, *Life Beyond the Safe House*, Human Trafficking Foundation, 2015; Sharp and Sedacca, p. 6.

Human Trafficking Foundation et al., Supporting Adult Survivors of Slavery to Facilitate Recovery and Reintegration and Prevent Re-exploitation, Independent Anti-Slavery Commissioner, 2017.

between the reasonable and conclusive grounds decisions,⁴⁰ inevitably increasing delays. The government's insistence on dragging out a decision-making process (one that has no clear purpose and does not exist for victims of other crimes) prevents people from moving on from their past and settling, particularly in relation to housing and employment.⁴¹

These delays are rationalised within the NRM through the widely proclaimed notion that positive NRM decisions can benefit asylum applications. ⁴² Not only is there no evidence for this, but it is also directly contradicted by government policy that clearly outlines the grounds for discretionary leave, and being a confirmed victim of modern slavery is categorically not one of them. ⁴³ Furthermore, entering the NRM can do damage to asylum applications. The process by which this damage is done is widely misunderstood but quite straightforward to describe. The threshold for referring somebody as a 'potential victim' is very low indeed, with generic signs and indicators highlighted as grounds for a referral, along with advice to frontline staff that if they have any concerns, it is best to make a referral. Referrals are commonly motivated more by frontline staff than they are by the people being referred. ⁴⁴ But when their case receives a negative decision because it does not meet an ambiguous but higher threshold, it is then returned to an asylum decision-maker who may view a negative NRM decision as evidence of the claimant's untrustworthiness. As a decision-maker said to me:

If you're saying you're a victim of sexual trafficking and that gets rejected and then you're claiming asylum because you believe that you'll be killed and raped by someone in Afghanistan, then I'm going to be like, 'well you're not really a victim of trafficking, if this proven all to be false, then how can I believe the rest of your story', which isn't always the case, because the person could have a genuine fear of something else.

⁴⁰ Home Office, *Modern Slavery*, 2024: 'From 30 January 2023, disqualification requests could be made for individuals if they are deemed to have met criteria for disqualification from the NRM. These criteria may be based on either grounds of public order, bad faith, or if the individual has already received a support period in the NRM.'

⁴¹ S Ferrell-Schweppenstedde, *Day 46*, Human Trafficking Foundation, 2016.

For instance, the government's claim that the NRM is being 'rampantly abused' by people in order to gain asylum, suggests that the NRM helps with asylum claims: Home Office, 'Alarming Rise of Abuse within Modern Slavery System', GOV.UK, 20 March 2021.

⁴³ M Gower, Briefing Paper Number 4786: Calls to change overseas domestic worker visa conditions, House of Commons, 2016.

J Findlay, 'Modern Slavery, Victim Identification and the "Victimized State", *British Journal of Criminology*, 2024, https://doi.org/10.1093/bjc/azae061.

This is less a process of recognising victimhood than it is another process of de-legitimising a migrant population that is already subjected to anti-migrant discourses which rationalise their oppression and deny them rights. Nor are people free to avoid entering the NRM. Whether or not the person has mentioned trafficking, if the Home Office thinks their case includes signs of trafficking and they choose not to enter the NRM, this is regarded as suspicious, as was recounted by a legal aid solicitor I interviewed:

Because you don't want us to investigate that...why should we believe you?' And that is generally the point that the Home Office takes, so I try and explain to them [her clients] the Home Office perspective on that, and say that the NRM at the end of the day, if you don't enter it, it will affect their credibility...and the Home Office will be less likely to take anything they say seriously.

Therefore, having 'signs of trafficking' in one's life story means that, whether one enters the NRM or not, the Home Office have grounds for de-legitimisation. Given that the leading source of referrals into the NRM is UK Visas and Immigration (UKVI)—in 2023, 5,218 of the 17,004 referrals into the NRM came from that department⁴⁵—for thousands of people, the NRM functions to delay their asylum, sometimes for years. More time in these systems can mean more time experiencing slow violence. Holly Indeed, and other first responder organisations detour their application through an extra bureaucracy of de-legitimisation before it returns to UKVI. Indeed, the very design of the NRM, being crafted into a two-stage decision-making process, guarantees an unending narrative that the NRM is filled with people who should not be in it. Designing a system in which people receive a positive reasonable grounds decision followed by a negative conclusive grounds decision, suggests that those people should not have received the support that they did during the interim period. The mechanism is designed to project fraudulence onto those who are, often unwillingly, funnelled into the system.

For those not already in the immigration system, frontline workers are encouraged to advocate referrals into the NRM, commonly foregrounding positives and potential positives, while encouraging people to disassociate the NRM from their valid fears about the harms of the immigration system. Consider these quotes from four employees of four separate subcontractor organisations in the NRM:

Ok, I would explain to them that [...] it's not about getting deported, or anything. This is separate, it's just...a framework for the government to

⁴⁵ Home Office, *Modern Slavery*, 2024.

⁴⁶ Sharp and Sedacca.

⁴⁷ Home Office, 'Alarming Rise'.

identify potential victims of modern slavery and ensuring that you get the support that you need.

I've always had to say to my clients as well what they do have to understand is that the NRM and the Home Office, they are completely separate organisations.

I think because there is a massive fear about being deported, and it's about explaining to them that if they are in the NRM that caseworker, you know they, the government aren't just going to turn up, take them, and deport them back.

So I explain that it allows them to be assessed, and whilst they're under the NRM they're not going [...] to be detained.

Such assurances are not true. Not only does the NRM extend the experiences of the asylum system that people wish to end, not extend, but people in the NRM are also subjected to other harms of the immigration system. Between 1 January 2019 and 30 September 2020, 4,102 people who engaged with the NRM 'were held in prison-like settings under Immigration powers', while others were deported. Through misinformation, the NRM is being presented as distinct from an immigration system that, in reality, it facilitates, emulates, and expands.

Since these research interviews, positive reasonable grounds decisions have been rising in number for UK nationals and declining for foreign nationals,⁴⁹ meaning more UK nationals are now experiencing the harms of this 'humanitarian' wing of the immigration system, including increased surveillance and control,⁵⁰ which matches a wider trend in immigration control, to expand and incorporate citizens and 'lawful' migrants into these same subordinating practices.⁵¹ At the same time, foreign nationals are suffering from more explicitly aggressive new measures. The UK government has introduced even more hostile legislation with the *Nationality and Borders Act* 2022, the *Illegal Migration Act* 2023 and the *Safety of*

⁴⁸ After Exploitation, Supported or Deported?; After Exploitation, Survivors Behind Bars: The detention of modern slavery survivors under immigration powers (2019-2020), After Exploitation, 2021, p. 3.

⁴⁹ IOM, UK National Referral Mechanism Data Analysis Briefing 8, IOM, 2024.

I Koch, P Williams and L Wroe, "County Lines": Racism, safeguarding and statecraft in Britain', Race & Class, vol. 65, issue 3, 2024, pp. 3-26, https://doi.org/10.1177/03063968231201325.

M Griffiths and C Yeo, 'The UK's Hostile Environment: Deputising immigration control', *Critical Social Policy*, vol. 41, issue 4, 2021, pp. 521-544, https://doi.org/10.1177/0261018320980653.

Rwanda Act 2024.52 Widespread condemnation of these measures from the antitrafficking sector includes concerns that they increase distrust of authorities, create further barriers to the identification of victims, and exacerbate vulnerability to exploitation.⁵³ They are also limiting access to support, including diminishing key legal protections to those who arrive in the country 'irregularly', and creating higher thresholds for positive reasonable grounds decisions, which dropped in number when new guidance was introduced.⁵⁴ These draconian measures should be objected to, but by expressing worry that they are making it harder to enter the NRM and to access 'support', we risk making the new goal a return to a pre-2022 system that was rejected by thousands of people who refused to be referred.⁵⁵ Those who were referred were often underinformed or misinformed about the NRM by the practitioners making the referrals.⁵⁶ And the constraints on workers' rights leave people vulnerable to destitution, further harm and exploitation.⁵⁷ In short, people's distrust of authorities and their resistance to the NRM should not necessarily be seen as problems to be overcome so much as indicators that solidarity might mean assisting in their evasion of state systems. Such acts of solidarity were already being enacted by some participants of my research, including by working overtime, not filling in Duty to Notify forms and directing people to alternative forms of support that do not require engagement with the NRM.58

To summarise the function of the NRM for immigration control: it includes more people in the immigration system by using humanitarian claims to obscure the similarities and connections between the NRM and other arms of immigration

At the time of writing, the Labour Party had won the 2024 general election and promised to end the plan to deport people to Rwanda, but intended to replace it with 'a more effective approach to tackling illegal immigration': S Francis, 'Starmer Confirms Rwanda Deportation Plan "Dead", BBC, 6 July 2024.

Hope for Justice et al., Open Letter to the UK Prime Minister Condemns the Safety of Rwanda Act, Unseen, 2024.

African Rainbow Family et al., Ignoring Slavery, Punishing Survivors, After Exploitation, 2023; Home Office, Modern Slavery: National Referral Mechanism and Duty to Notify statistics UK, Quarter 1 2023 – January to March, Home Office, 2023; Hope for Justice et al., Open Letter, L C Medlicott, 'Potential Modern Slavery Victims Sent Packing As New UK Borders Act Bites', openDemocracy, 26 May 2023.

Home Office, Modern Slavery: National Referral Mechanism and Duty to Notify Statistics UK, End of Year Summary, 2021, Home Office, 2022.

⁵⁶ Findlay, 'Modern Slavery, Victim Identification'.

⁵⁷ Sharp and Sedacca.

The ATMG long ago noted that some local authorities choose not to make some referrals because they fear the detrimental consequences of negative NRM decisions on a person's immigration status: ATMG, *The National Referral Mechanism*.

control; it extends the slow violence of the asylum system for an even longer period of time; and it lowers the legitimacy of already marginalised people by producing referrals to be denied, thereby damaging their asylum claims.

Profiting from Impoverishment

This section will show that public funds are going towards the expansion of an already prolonged and harmful bureaucracy despite its wastefulness. Organisations produce this impoverishment, capitalising on an ingrained antimigrant discourse that presents migrants, rather than the rich, as that which the economy cannot afford.⁵⁹ The political achievement of embedding the idea that social and economic exclusions of 'the immigrant' are necessary and economically beneficial has allowed the proliferation of private companies that exist to ensure such exclusionary treatment is enforced, even at staggering financial, material, and human expense.⁶⁰

Asylum policy has become increasingly unstable and hostile as a direct consequence of privatisation and austerity measures, intensifying in 2012 when the Home Office signed six contracts, known as COMPASS, with three private contractors. While private companies see excess money as profit, local authorities have been able to use such money for 'wraparound services'. And while factors like damp and vermin infestations would cause a local authority to reject a property as unacceptable for asylum housing, private companies look at the lowest end of the market. Rather than proving the illegitimacy of these companies, increasingly austere conditions serve to cut costs for companies that have won government contracts, supplementing their extractive profits while demonstrating that they have fulfilled their supposed duty of deterring 'illegitimate claimants'. So while Serco was fined GBP 6.8 million for contractual failings from 2013 to 2018, such as insufficient property standards and issues not being addressed quickly enough, it was still awarded some of the new asylum contracts in 2019, collectively worth approximately GBP 4 billion.

⁵⁹ A Sayer, Why We Can't Afford the Rich, Policy Press, Bristol, 2016.

L Mayblin, 'The Death of Asylum and the Search for Alternatives', *Discover Society:* New Series, 2021, https://doi.org/10.51428/dsoc.2021.01.0003.

Darling, 'Asylum in Austere Times'; S A Hirschler, *Hostile Homes: Violence, harm and the marketisation of UK asylum housing*, Palgrave Macmillan, Cham, 2021.

⁶² Darling, 'Asylum in Austere Times'; Mayblin, *Impoverishment*.

⁶³ Home Office, 'New Asylum Accommodation Contracts Awarded', Home Office, 8 January 2019; F Perraudin, 'Serco Given New Asylum Housing Contracts Despite £6.8m Fines', *The Guardian*, 20 June 2019.

Charities have also engaged in this market competition. In the 2019 bout of contracts, the charity Migrant Help was awarded a ten-year contract worth GBP 235 million for Advice, Issue Reporting and Eligibility (AIRE). This is meant to provide information to service users navigating the asylum system and to be an independent point of contact for housing-related issues, despite warnings that separating the reporting of repairs from the companies performing the work would slow the process and create dangerous living situations. ⁶⁴ Many complaints from asylum seekers are now targeted at Migrant Help and the AIRE contract, including an open letter by 120 UK organisations to the Home Office describing the 'drastically increased waiting times'. 65 In this way, just as privatisation provided a buffer to direct criticism of government, this new additional contract, which directs public funds to yet another external provider, functions as a barrier to direct criticism of the private housing providers. Bulman even quotes one asylum seeker saying that it was better when G4S took housing complaints: 'It's got much worse. Now we don't even know who to report to.' Another said, 'I never thought I would say this, but I miss G4S.'66 AIRE is therefore another private contract, in this case a charity, earning GBP 10-20 million a year from the deal.⁶⁷ Such contracts are not saving the public/government money, nor are they improving services for asylum seekers. Instead, the expensive layering of bureaucracy is making the services worse.

The extension of the asylum system's slow violence through the introduction of another bureaucracy—the NRM—has therefore served to increase the profitable contracts available. Indeed, Migrant Help is one of two support providers to victims in the Northern Irish and Scottish NRMs, and one of originally 12 subcontractors to the Salvation Army for victim support in England and Wales. The Salvation Army were given a five-year GBP 281 million Modern Slavery Victim Care Contract for adults in the NRM, beginning in 2021.⁶⁸ A recent reduction in positive reasonable grounds decisions means fewer people are receiving support.⁶⁹ But we must remember that thousands who are referred to

⁶⁴ J Grayson, "'Mears Must be Sacked from Asylum Housing Contract'' Demands Sheffield's Housing Chair', Institute of Race Relations, 22 January 2020.

Refugee Action *et al.*, 'Joint Letter to the Government: Crisis in asylum support', Refugee Action, 5 November 2019.

M Bulman, 'Asylum Seekers Left with No Heating in Rat-Infested Homes Due to "Failing" New Home Office Contract, Charities Warn', The Independent, 2 November 2019.

⁶⁷ Corporate Watch, 'New Asylum Contracts: Mears group and Migrant Help win big, as G4S loses housing deal', Corporate Watch, 17 January 2019.

Home Office, Home Office Annual Report and Accounts: 2020 to 21, Home Office, 2022.

⁶⁹ Medlicott.

the Salvation Army receive no support at all,⁷⁰ while others going through the NRM are detained or deported.⁷¹ For those who do receive support services, subsistence payments do not necessarily cover essential needs.⁷² The paternalistic and controlling dynamics that have been well-recorded in literature on anti-trafficking⁷³ were discussed in my interviews as well. A police detective said:

people who are going into it are still restricted in many ways. They're still being controlled, you know they've not got that control, that full control back over their lives. So they go from one place where they've been told what to do, where they can stay, where they can sleep to the same thing really, but in a different way.

A support worker:

A lot of people that are in the safe house said that their experience of being in the safe house and going...through the NRM was sometimes more traumatising than their actual trafficking experience. Because they, they're again in a situation where they felt they had no control.

A local council worker:

majority of those that I work with are probably post-NRM, I don't think I've met one that has anything positive - or had a positive experience out of it. They haven't said, '[Oh], thank goodness I did the NRM, because otherwise, you know, what would...my life have been.'

And a senior figure at the Salvation Army said she felt 'to some extent that there are people, in inverted commas, "trapped in the NRM", and...it's actually preventing them from moving on with their lives'.

Purported positives of the NRM have to be evaluated with its harms. Instead, what are often foregrounded are individual stories of support and benefit,⁷⁴ as though these can be taken as evidence that it is right to fund and participate in the NRM in order to do some good, even if we cannot do as much as we would want. Consider the response of a support worker when faced with clients who want to leave the NRM and 'go home':

⁷⁰ Salvation Army, Supporting Survivors of Modern Slavery, Salvation Army, 2022, p. 13.

⁷¹ After Exploitation, Supported or Deported?

⁷² Sharp and Sedacca.

⁷³ L M Agustín, Sex at the Margins: Migration, labour markets and the rescue industry, Zed Books, London, 2007.

⁷⁴ Salvation Army, Supporting Survivors.

Usually what I try to say to my clients...that are wanting to go home, I do let them know, actually...there is the...potential opportunity for compensation upon receipt of a positive CG [conclusive grounds decision], so sometimes that says to them, ok, you know what, I do want to stay, because, just for a little bit until I get my decision.

This attempt to dissuade someone from leaving the NRM was in spite of the fact that none of this support worker's clients had ever received such compensation. They had a colleague whose client had received GBP 1,500 in compensation, after spending a year and half in their service, which this support worker thought was 'great'. But such a sum comes nowhere close to making up even for the wages they would have been unable to earn while having no right to work when in the NRM (if they were a non-EU citizen), let alone what they were not paid in the initial exploitation. A sum of GBP 1,500 is just over a month's wages at minimum wage. In order to understand why celebrating this figure misrepresents the value of the NRM, the wages this person could have earned during the time they spent in the NRM should be subtracted from GBP 1,500, as should the wages of everyone else who receives no such compensation at all. To further calculate the waste, we should also subtract the money spent by the government on services that only exist because the person is not allowed to work. For instance, a senior staff member at the Salvation Army told me that because asylum seekers are not allowed to work, subcontracted support workers in the NRM:

will do their utmost to keep people occupied. So they will, where possible, try to find...voluntary work for people to do, and just generally try to give them meaningful activities within the safe house.

Since the asylum seeker is not allowed to engage in useful paid employment, a support worker is paid money to distract them. The sum of GBP 281 million could do an immense amount of good. For that matter, so could the people being held in this protracted state of limbo. But neither the money nor the people are allowed to do that. Many practitioners certainly act with care and some anti-trafficking work involves necessary support. But by framing the NRM contract as being about support for victims of modern slavery, the dominant discourse implies that the work involves responding to problems caused by traffickers and slave drivers. In actuality, the NRM is responding to problems produced by immigration policies, but due to contractual obligations, these responses conform to, rather than undermine, those policies. In this way, as this article has been describing, the apparatus of the immigration system is expanded by anti-trafficking and the harms are extended.

Rather than these bureaucracies processing people out of the system, it would perhaps be more apt to suggest they are kettling them: the expansion of bureaucracy increases the delays that keep people in limbo, which includes being kept in spaces and circumstances they would not otherwise be in. The private

and third sectors have a vested interest in the government maintaining a constant supply of destitute people, being passed back and forth from destitution to care to detention, ⁷⁵ neither deported, nor free to live and work. Groups like G4S and Serco and charities like the Salvation Army and Migrant Help profit from their interactions with all who are held in this enduringly indeterminate state. While those who work for the Salvation Army may be unlikely to be motivated by profit, the monopsonistic quasi-market creates pressures that demand contractors internalise corporate logics and accommodate government demands in ways that can ultimately challenge the value commitments the organisation once held. ⁷⁶ Removing the exclusions that prevent people from living and working in the UK would mean reducing the number of people being employed to produce those restrictions—those who hold people in a state of limbo and interact with them in that state. It would reduce the industry. If the anti-trafficking sector really wishes to see a world where it is no longer needed, it has to envisage the ways in which its own end can be brought about. The industry controlling the lives of other people is expanding and becoming more and more profitable, not because it is increasing efficiency or liberating people, but precisely because it is not.

This brings us back to why my initial suggestion—on how to spend leftover money not used during the COVID period—was never going to be implemented. Profits increase as immigration controls expand⁷⁷ and immigration controls expand as the immigration industry's 'failures' to control irregular migration produce more demands for the industry's interventions.⁷⁸ The NRM, as with anti-trafficking more generally, participates in that industry, here funded by a government whose policies have produced the impoverishment. Government NRM funding is expanding the bureaucratic apparatus of control and impoverishment, creating profit in the process. If the funding is provided to expand the apparatus of control, the money must largely be spent before it hits the bottom. Subsistence payments in

Participants of my research mentioned people going through the NRM more than once. Asylum seekers are sometimes detained more than once: Refugee Council, *Detention in the Asylum System*, Refugee Council, 2022; some people are made destitute upon leaving the NRM and/or are 're-trafficked': ATMG, *Before the Harm*; this makes them liable to once again be identified as a 'potential victim' of modern slavery and referred into the NRM. Even when people only enter the NRM once, they are still likely to experience other parts of the system: After Exploitation, *Survivors Behind Bars*.

This was also found to be the case in research on the Salvation Army in Australia, and the government contract it held for a system called 'The Job Network', which saw NGOs competing to provide labour market services to unemployed people: D Garland and M Darcy, "'Working together?": The Salvation Army and the job network', *Organization*, vol. 16, issue 5, 2009, pp. 755-774, https://doi.org/10.1177/1350508 409339114.

⁷⁷ R Andersson, 'Profits and Predation in the Human Bioeconomy', *Public Culture*, vol. 30, issue 3, 2018, pp. 413-439, https://doi.org/10.1215/08992363-6912115.

⁷⁸ Andersson, 'Europe's Failed "Fight".

the asylum system and the NRM are capped to keep people in a state of precarity.⁷⁹ You cannot just give money to those most in need of money because that is a liberating thing to do, and liberation is not the goal of the immigration system.

Recommendations

1. Defund the NRM

For those who seek to support all people who are marginalised and harmed by immigration controls, the appropriate response is to call for the de-funding of the NRM. This suggestion surely sounds radical, but this is because the standard way of evaluating the NRM significantly distorts the full impact of its own existence. Of Campaigns for change in the NRM have largely been stuck in the pursuit of 'reformist reforms', which, as border abolitionists observe, maintain and expand the system in the process of tweaking it. All funding for immigration control, including hiring people to deal more 'sensitively' with specific migrant groups, ultimately strengthens the system.

A counterargument might be made that even if defunding the immigration system is a good idea (a suggestion many within anti-trafficking would disagree with), as long as that system exists, support services should be funded. For comparison, even if prisons should be defunded, it is still right to fund chaplains and counsellors in prisons for as long as prisons exist. The last funding to be removed should be the salaries of those involved in care-giving roles.

I think this is true, which is why it is so important to understand why this is not an equivalent analogy to funding the NRM bureaucracy in the context of the immigration system. Rather than simply funding the support services of charities, it is reorienting their practices. Funding from sources with conflicting priorities can substantially change the value commitments an organisation holds. While anti-trafficking funding provides salaries to many genuinely compassionate, hard-working people, the funding imposes restrictions on what can be done. As a former support worker said to me:

⁷⁹ Mayblin, *Impoverishment*.

This argument has also been made about the anti-trafficking industry more broadly: J Mendel and K Sharapov, 'Expanding Circles of Failure: The rise of bad anti-trafficking, and what to do about it', *Global Policy*, 18 November 2021.

Abolitionists advocate instead for non-reformist reforms: G M Bradley and L de Noronha, *Against Borders: The case for abolition*, Verso, London, 2022.

⁸² Garland and Darcy, "Working together?"

I think the damage that they were causing to these women, I couldn't be a part of that anymore, I couldn't work within the rules that I had to work within...I already was bending the rules that I wasn't meant to, but...I was doing the best that I could in the limitations that I had under the structure that I had to work within, and I got...burnt out because of having to work within those restrictions.

Most significantly, a prison chaplain neither increases the number of people subjected to imprisonment, nor the length of time they are incarcerated. There is no increase in impoverishment. In contrast, as shown, the NRM both increases the number of people subjected to the harms of the immigration system and the length of time they endure these harms. There is an increase in impoverishment.

It is not acceptable to keep perpetrating these harms while foregrounding particular instances of assistance. When a sector that presents itself as an engine of emancipation decontextualises stories of help from the apparatus of slow violence in which they occur, it prevents people from seeing why the mechanism itself does more harm than good. For UK nationals also, the NRM support is often piecemeal, can have negative impacts on social networks and lead to more surveillance and social control, partly through multi-agency collaboration around young people and their families.⁸³ Only by defunding the NRM can we protect people from the slow violence it perpetrates and from other immigration harms and social controls that are enabled through this 'humanitarian' pathway.

2. Organise through Community Building

Bureaucracies are often thought of as ways of administrating the allocation of naturally scarce resources. Yet often, bureaucratic rules are constructing the scarcity of resources by preventing people from accessing resources that are actually more abundant. His is missed when the relative abundance or scarcity of a resource is not considered—where we assume that all bureaucratic restrictions exist for equally valid reasons. But the construction of scarcity has always been a necessary component of capitalism. Attempts to make direct use of the abundance are punished through bureaucratic violence. We must remember that care-giving labour (and the potential labour of asylum seekers), just like land, food, and so many other abundant resources, are put off-limits in the making of a false and unnecessary scarcity that does not actually exist outside of the forceful bureaucracy that constructs it. Hence the funding to the NRM is restricted from doing as much good as it could. Many undocumented people would prefer to stay destitute than apply for government support because of their reasonable

⁸³ Koch et al., 2024.

⁸⁴ Graeber, The Utopia of Rules.

⁸⁵ J Hickel, Less is More: How degrowth will save the world, Random House, London, 2020.

concerns about government actions against them. They are also deterred from accessing support from larger voluntary organisations because of perceived affiliations with the Home Office. 86 While alternative channels of support will not come with multimillion-pound contracts, they need not come with the same threat of harm either. While such approaches can also involve harm, it is worth taking the caution of undocumented people regarding state systems as a starting logic, and focusing on what work is already being done to support people in their daily living needs and state evasion efforts, outside of the NRM bureaucracy, and to work at expanding those forms of support.

At its best, decentralised support networks can avoid coercive and bureaucratic forms of organisation, arranging things instead through the mutual aid principles of voluntary association and democratic, collaborative decision-making around shared concerns. This approach collapses distinctions between those who help and those who are helped, disrupts the hierarchies of charity culture and helps to meet needs and mobilise people for significant resistance.⁸⁷ Many faith-based groups can and do make spaces, resources, and pools of money available without applying the same conditions as state bureaucracies and can therefore fund support to undocumented people with fewer strings attached. Sometimes people can use services without revealing personal information.⁸⁸ Yet even these avenues have been threatened by increasing encroachment of immigration enforcement into such spaces.⁸⁹ These environments should be defended from such encroachment. It is worth noting, for instance, that MSHT campaigns within churches like the Salvation Army, the Church of England, and the Catholic Church, undermine this disassociation, as such campaigns have more links to the police, the NRM and the Home Office.90

H Crawley, J Hemmings and N Price, *Coping with Destitution*, Oxfam and Swansea University, 2011.

⁸⁷ J Preston and R Firth, Coronavirus, Class, and Mutual Aid in the United Kingdom, Palgrave Macmillan, Cham, 2020; D Spade, 'Solidarity Not Charity: Mutual aid for mobilization and survival', Social Text, vol. 38, issue 1, 2020, pp. 131-151, https://doi.org./10.1215/01642472-7971139.

⁸⁸ Crawley et al.

M Atkinson, (Un)holy Alliances: The UK's hostile environment in faith-based spaces, and its implications for refugee protection, Working Paper 47, Refugee Law Initiative, University of London, 2020.

The Salvation Army has engaged in dubious practices of data sharing and facilitation of immigration control activities: D Taylor, "Trafficking Victim Wins Landmark Victory in Salvation Army Data Case', *The Guardian*, 12 December 2022; D Taylor, 'Home Office "Infiltrating" Safe Havens to Deport Rough Sleepers', *The Guardian*, 15 October 2019. The Catholic Church's Santa Marta Group is an 'alliance of police chiefs and bishops from around the world working together with civil society to eradicate human trafficking and modern day slavery': Santa Marta Group, *About*, SMG, 2022, https://

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In addition to faith-based groups, friends, community networks, and food banks too have helped where the subsistence payments of the NRM have proven insufficient. Frontline workers already try to find alternative avenues of support when people are either rejected by the NRM or choose not to be referred. Support workers typically engage in such activities anyway when NRM provisions end. While this is precarious, we should not imagine that a solution to undocumented people's precarity will normally be provided through the same state apparatus that is producing their instability. At the moment, and in the near future, community building and the efficient use of resources will provide more security than government-funded bureaucracies.

Conclusion

Vast profits are being made through large-scale projects of impoverishment. Understanding that government anti-trafficking funding demands that anti-trafficking practitioners assimilate into practices of impoverishment is essential for comprehending why this funding harms those in the NRM more than it helps them. Similarly, externalising the harms of the NRM onto the rest of the immigration system by constructing a myth of differentiation between the two obscures the significant harms produced by the NRM itself. Asylum decisions are delayed by entrance into the NRM, meaning the slow violence at work in the asylum system is stretched out over a longer period of time, while the flawed premises of victim identification mean that the NRM process renders some asylum applications less credible to decision-makers. Thousands of people referred into the NRM are also detained under immigration powers.⁹²

Left unaddressed, the anti-trafficking sector will continue to grow alongside an industry of control and criminalisation, ⁹³ as an impoverished population are administrated and criminalised by those who have impoverished them. ⁹⁴ Those who seek to support people harmed by the immigration system should therefore demand the defunding of bureaucracies that increase impoverishment

santamartagroup.org/about/the-santa-marta-group. And all of the reports submitted to the Church of England's 'Safe Car Wash App' are made available to police officers and data analysts: Clewer Initiative, *Safe Car Wash App*, Clewer Initiative, 2020.

⁹¹ Sharp and Sedacca.

⁹² After Exploitation, Survivors Behind Bars.

J Chuang, 'Exploitation Creep and the Unmaking of Human Trafficking Law', The American Journal of International Law, vol. 108, issue 4, 2014, pp. 609-649, https://doi.org/10.5305/amerjintelaw.108.4.0609; J Musto et al., 'Anti-Trafficking in the Time of FOSTA/SESTA: Networked moral gentrification and sexual humanitarian creep', Social Sciences, vol. 10, issue 2, 2021, https://doi.org/10.3390/socsci10020058.

⁹⁴ Andersson, 'Profits and Predation'.

behind humanitarian veneers. In the UK, that means calling for the defunding of the NRM, the ending of a decision-making system that has no clear purpose and the abolition of the entire apparatus of border violence. In place of government-funded anti-trafficking work, solidarity should focus on developing less bureaucratic forms of community support with those most threatened by the immigration system.

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Expansion, Fracturing, and Depoliticisation: UK government anti-trafficking funding from 2011 to 2023

Kiril Sharapov, Jonathan Mendel, and Kyle Schwartz

Abstract

Anti-trafficking policy discourses and funding trajectories in the UK are developing and expanding in a fractured way. This paper demonstrates that current policies and funding allocations primarily focus on supporting specific 'victims' and targeting indistinct 'criminals', rather than addressing the broader structural issues underlying human trafficking. This focus perpetuates ignorance of harm done at other scales. Supporting migrants who meet a narrow definition of 'victims' effaces how government-funded projects and agencies abuse migrants and exacerbate their vulnerability to exploitation. Anti-trafficking funding from the UK's Official Development Assistance addresses both the individual and structural scales. However, structural problems are often framed as external, neglecting the impacts of UK policies that increase the vulnerability of migrants and low-paid or casualised workers. We also demonstrate that the UK government's anti-trafficking discourse and funding are increasingly fractured along spatial lines, with a limited emphasis on the rights of exploited individuals outside the UK coinciding with attacks on the rights of migrants inside. Instead of narrow, depoliticised anti-trafficking discourses, it is vital to critique government policies that cause structural harm and amplify migrants' vulnerability to exploitation. This could involve defunding certain government activities that increase vulnerabilities rather than merely expanding individual-level funding.

Keywords: migration, immigration policy, human trafficking, repoliticisation, anti-trafficking, defunding, freedom of information

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Introduction

This paper builds on the use of Freedom of Information (FOI) requests in Sharapov's earlier work,¹ to produce a fuller picture of the UK anti-trafficking landscape today.² By examining anti-trafficking funding allocated by UK government departments, police forces, and local councils in the financial year 2012/13, Sharapov argued that anti-trafficking funding was primarily directed towards 'crime prevention and border "management", including shutting and "offshoring" the UK border, rescuing "genuine" victims, and funding anti-trafficking projects in countries of origin'.³ This paper draws on FOI requests submitted to UK central government departments in 2017, 2020, and 2023.⁴ These requests covered six financial years and sought information on direct spending to combat human trafficking and 'modern slavery', along with related policy and strategy documents. Our longitudinal data collection process yielded both qualitative and quantitative data, which were compiled and analysed. This analysis suggests that although the UK government's anti-trafficking funding continues to reflect its dominant discourse,⁵ both the discourse and funding are

¹ K Sharapov, 'Giving Us the "Biggest Bang for the Buck" (or Not): Anti-Trafficking government funding in Ukraine and the United Kingdom', *Anti-Trafficking Review*, issue 3, 2014, pp. 16-40, https://doi.org/10.14197/atr.20121432.

O'Connell Davidson, 'Slavery and the Revival of Anti-Slavery Activism', in L Brace and J O'Connell Davidson (eds), Revisiting Slavery and Antislavery: Towards a critical analysis, Palgrave Macmillan, 2018, https://doi.org/10.1007/978-3-319-90623-2_1. In this paper, we refer to 'human trafficking' as defined by the UN Protocol to Prevent, Suppress, and Punish Trafficking in Persons, Especially Women and Children. This definition explicitly links 'trafficking in persons' to exploitation (a term which lacks an internationally recognised legal definition) and lists 'slavery or practices similar to slavery' as forms of exploitation (alongside forced labour, the exploitation of the prostitution of others, or other forms of sexual exploitation, etc.). All references to human trafficking here encompass 'modern slavery' as defined by the UK Modern Slavery Act 2015. We use 'modern slavery' in contexts such as policy documents, departments, and specific reports. We place 'modern slavery' in inverted commas when discussing this critically to highlight the narrow, depoliticised, and ahistorical use of this term by the UK government in its anti-trafficking strategy.

³ Sharapov, 2014, p. 39.

⁴ All calculations presented in this article, which may utilise exchange rates, inflation calculators, and available government data, are intended for illustrative purposes only. Due to the use of incomplete FOI-sourced government data and potential fluctuations in exchange rates and inflation, these data and calculations may not fully reflect the actual amounts spent or allocated. Readers are advised to interpret the financial figures with caution and consider the potential limitations and variability in the data sources.

K Sharapov, "Traffickers and *Their* Victims": Anti-Trafficking policy in the United Kingdom', *Critical Sociology*, vol. 43, issue 1, 2017, pp. 91–111, https://doi.org/10.1177/0896920515598562.

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increasingly fractured along spatial lines. There is a growing emphasis on the rights of trafficked and exploited individuals outside the UK. However, this focus is often limited and primarily aimed at preventing migration to the UK. Meanwhile, UK immigration policies increasingly criminalise irregular migrants, making their lives more perilous. This narrow focus on the human rights of trafficked and exploited people outside the UK, and spending on services for 'deserving' victims within the UK, also aligns with government policies that strip rights from irregular migrants inside the UK. Trafficking within the UK continues to be framed as a matter of individual criminals and victims.⁶

This fractured discourse—and the counter-productive spending patterns it generates—is enabled by a depoliticised consensus around trafficking as a major but individualised and non-specific evil, failing to address the broader systematic causes of trafficking and exploitation.⁷ Against this, we argue for a repoliticisation of challenges to exploitation—including a critical engagement with contested political issues such as the rights of irregular migrants inside the UK, workers' rights, the right to welfare, and the potential for reducing trafficking and exploitation risks by defunding certain government activity (including, for example, immigration enforcement).⁸

The paper begins with an overview of the research methodology describing the use of FOI requests to examine government practices affecting everyday life. The Results section presents key findings, including funding totals. The section starts with the Cabinet Office, followed by reviews of departments primarily

K Sharapov and J Mendel, 'Trafficking in Human Beings: Made and cut to measure? Anti-Trafficking docufictions and the production of anti-trafficking truths', *Cultural Sociology*, vol. 12, issue 4, 2018, pp. 540–60, https://doi.org/10.1177/1749975518788657. For the most recent discussion of 'ideal' victimhood in the human trafficking discourse, see A Forringer-Beal, 'Why the "Ideal Victim" Persists: Queering representations of victimhood in human trafficking discourse', *Anti-Trafficking Review*, issue 19, 2022, pp. 87–102, https://doi.org/10.14197/atr.201222196.

⁷ J Mendel and K Sharapov, 'Re-Politicising Anti-Trafficking: Migration, labour, and the war in Ukraine', *Anti-Trafficking Review*, issue 22, 2024, pp. 52-73, https://doi.org/10.14197/atr.201224224.

We completed the final revisions to this article in the summer of 2024, shortly after the change of the UK government following the general election. Some migration policy has changed as a result of the change of government—for example, the plan for the UK to send refugees to Rwanda has been scrapped. While further changes are likely to follow, the new government's approach to migration also looks highly likely to involve policies and spending that make migrants more vulnerable to exploitation (for example, by imposing and enforcing migration restrictions). The Scottish Refugee Council has prepared a helpful summary of the current (at time of writing) situation, see 'New UK government: What changes have been made so far?', 25 July 2024, https://scottishrefugeecouncil.org.uk/labour-immigration-refugees-policy-campaign.

responsible for employment and welfare, economic and financial systems, and those working cross-sectorally. It concludes with departments focused on international development and agencies in immigration, policing, and criminal justice. This combined focus reflects key representations of human trafficking in the UK's anti-trafficking/'modern slavery' policy⁹ including organised crime, 'illegal' immigration, and victim assistance.

The Discussion section explains how anti-trafficking funding priorities mirror the UK government's strategy of reducing 'modern slavery' to a narrow range of themes, which differentiate between trafficking 'abroad', at the UK border, and 'at home'. Through this funding and discursive strategy, the government diverts attention from recognising and addressing human trafficking as a complex multi-dimensional issue reflective of economic and social injustices. The paper concludes by summarising the findings and calling for further discussion and action to defund government agencies, policies, and activities that increase vulnerability to exploitation.

Methodology

This paper adopts the methodology utilised in Sharapov's 2014 research, using FOI requests to collect data on anti-trafficking funding provided by UK central government departments. It relies on FOI requests as a valuable source of longitudinal data in anti-trafficking research. While FOI legislation aims to 'enhance transparency' and allow citizens to 'learn more about the practices of government that affect everyday life', as Walby and Luscombe argue, the full potential of FOI as a powerful research tool is not yet fully realised. Walby and Luscombe note that FOI requests can reveal secretive but impactful government decisions and policies. Although we do not claim that anti-trafficking funding allocations are secretive, the contentious political context surrounding immigration and crime often makes the UK government reticent in disclosing related costs.

We acknowledge the limitations of using FOI requests, ¹¹ including the lengthy and uncertain process from data identification to response. This process may lead to

⁹ Reviewed in Sharapov, 2017.

K Walby and A Luscombe, 'Introduction: Freedom of Information and Research Design in International Perspective', in K Walby and A Luscombe (eds), Freedom of Information and Social Science Research Design, Routledge, 2019, p. 16, https://doi.org/10.4324/9780429437717-1.

See Walby and Luscombe. In addition, see, for example, B Hawkins *et al.*, 'The Law of Diminishing Returns? The challenge of using freedom of information legislation for health policy research', *Critical Public Health*, vol. 33, issue 4, 2023, pp. 383–86, https://doi.org/10.1080/09581596.2023.2220134.

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data being withheld due to exemptions, including cost and data sensitivity issues preventing public release. Consequently, data from FOI inquiries, even when timely and unexempted, may not fully reflect the situation. Research by Thomas indicates that in the UK, the alleged balance between security and disclosure is skewed, with security often being prioritised. He critiques the UK's freedom of information legislation for acknowledging that disclosure might compromise public interests, while failing to recognise the risks of secrecy. In discussing the use of FOI to investigate UK government decision-making, Sheaff demonstrates how a critical approach to FOIs can reveal insights into less visible government practices.

Accessing the data involved submitting nearly fifty FOI requests to central government departments over three periods: Autumn 2017 (for financial years 2015/16 and 2016/17), Autumn 2020 (for 2018/19 and 2019/20), and Spring 2023 (for 2021/22 and 2022/23). This process included clarifying the information sought, filing responses, and systematically organising and interpreting the data through quantification and coding. We carefully crafted each request to remove ambiguity and avoid confusion among FOI coordinators, which could lead to 'information not held' denials. By using identically worded FOI requests, with slight modifications for different dates and legislative changes, like the *Modern Slavery Act 2015*, we compiled an extensive multi-institutional dataset, enabling comparative analysis over seven years. Each request contained two questions, asking the contacted authority to: (a) Identify budgets/funding or resources directly allocated towards anti-trafficking/'modern slavery' in respective financial years; and (b) provide a copy of the organisational strategy or document outlining actions against trafficking/'modern slavery'.

OD Thomas, 'Security in the Balance: How Britain tried to keep its Iraq war secrets', *Security Dialogue*, vol. 51, issue 1, 2020, pp. 77–95, https://doi.org/10.1177/0967010619839544.

¹³ *Ibid.*, p. 77.

M Sheaff, 'Using FOI to Explore Governance and Decision-Making in the UK', in Walby and Luscombe (eds).

¹⁵ The UK financial year runs from 6 April to 5 April of the following year.

As part of this study, we approached all police forces and thirty largest local councils in the UK. However, due to data volume and limitations on the article length, this article focuses solely on funding allocation within UK central government departments. We plan to provide further analysis on anti-trafficking/modern slavery funding in UK policing and local councils in future publications.

While we acknowledge Walby and Luscombe's views that ethical reviews are unnecessary for research based on FOI requests, we obtained ethical approval from the University of Dundee's Ethical Review Board for the last wave of requests.¹⁷

During the 'accessing stage', we faced delays and had to respond to high-cost estimates used as a basis for refusal. However, when contacting central government departments, in all instances where information was disclosed, we received purposefully written responses rather than poorly scanned photocopies of spreadsheets or heavily redacted or 'blanked out' documents. Consistent with Spiller and Whiting's observations, the depth and thoroughness of the reviews were markedly affected by the responder's skills and expertise. Despite responses being typically attributed to an impersonal 'FOI Team', it was clear that individual input was behind each response.

Like much work using FOI requests, our data depended on several factors. These included: what information was available, discoverable, and disaggregated on internal systems in such a way that it could be made available in response to a request like ours; who had prepared and processed this information, and their individual interpretations of what should be included. Responses could vary depending on anything from how the person handling the request understood 'trafficking' to how much time people elsewhere in the organisation had to answer emails.¹⁹

The analysis stage posed challenges due to the varying content and format of responses. Some were straightforward, while others offered vague estimates, redirected us to other agencies, or referenced poorly organised online data, often missing or incomplete. We used contextual and discourse analysis to: (a) calculate, where feasible, the total funding for anti-trafficking activities; (b) identify key themes in these allocations; and (c) examine the representation of anti-trafficking in policies and financial allocations, building on Sharapov's work on the representations of human trafficking in UK government policy.²⁰

¹⁷ K Walby and A Luscombe, 'Ethics Review and Freedom of Information Requests in Qualitative Research', *Research Ethics*, vol. 14, issue 4, 2018, pp. 1–15, https://doi.org/10.1177/1747016117750208.

¹⁸ K Spiller and A Whiting, 'UK Experience of Freedom of Information as a Method of Enquiry', in Walby and Luscombe (eds).

We specifically requested details of direct allocations to reduce workload and the risk of cost-based refusals, which may have led the oversight of data not explicitly labelled as human trafficking or modern slavery.

²⁰ Sharapov, 2017.

Results

The Cabinet Office and Central Government Departments and Agencies Responsible for Employment and Welfare

The Cabinet Office, a ministerial department supporting the Prime Minister, reported no anti-trafficking funding from 2015 to 2017 and had no dedicated policies. In 2018/19, it allocated over a million pounds to the 'Hidden in Plain Sight' campaign to raise awareness of exploitation among healthcare, job centre, and bank staff. In 2021/22 and 2022/23, it reported no direct spending, deferring anti-trafficking efforts to the Home Office.

Acknowledging the role of the British state in fostering poor working conditions and allowing abusive labour relations,²¹ we next examined departments broadly responsible for employment and welfare. The Department for Work and Pensions (DWP), overseeing welfare, pensions, and child maintenance, reported no direct anti-trafficking funding for 2015/16 and 2016/17, integrating victim support into broader staff duties without a specific policy. By 2020, the DWP had not provided dedicated funding, but was committed to addressing human trafficking through multi-agency cooperation, staff training for victim identification, and establishing a reporting mechanism for concerns. In its 2023 response, the DWP cited the cost of gathering information across 600 job centres as a reason for not providing data; however, it mentioned a focus on victim identification and support, investigating system abuses, and monitoring supply chains.

The Department for Business, Energy and Industrial Strategy (BEIS), operational from July 2017 to February 2023,²² aimed to enhance workplaces and support a thriving UK economy. No strategies were reported for 2015/16 and 2016/17. In 2020, although not directly funding anti-trafficking initiatives, BEIS noted that bodies like the Employment Agency Standards Inspectorate²³ and the HMRC National Minimum Wage team collaborated to refer trafficking cases

See, for example, SN Hodkinson *et al.*, 'Fighting or Fuelling Forced Labour? The Modern Slavery Act 2015, irregular migrants and the vulnerabilising role of the UK's hostile environment', *Critical Social Policy*, vol. 41, issue 1, 2021, pp. 68–90, https://doi.org/10.1177/0261018320904311.

The department was formed in July 2016 and dissolved in February 2023, with functions divided among three new departments. The 2023 response was provided by the Department for Business and Trade, one of these new departments.

The role of the Employment Agency Standards Inspectorate is to 'protect the rights of agency workers by ensuring that employment agencies and businesses treat their workers fairly'. See 'Employment Agency Standards Inspectorate', GOV.UK, 2022, retrieved 9 April 2024, https://www.gov.uk/government/organisations/employment-agency-standards-inspectorate.

to appropriate authorities, but could not specify funding for trafficking-related training or operations. In 2023, its successor, the Department for Business and Trade, reported no data.

The Gangmasters and Labour Abuse Authority (GLAA), established as the Gangmasters Licensing Authority (GLA) in 2005 and expanded in 2017 to cover the entire economy,²⁴ reported limited anti-trafficking actions in 2017/18 and expenditure of GBP 874.14 in 2015/16 and GBP 15,596.80 in 2016/17 with no jurisdiction over trafficking offences. After its remit expansion, it allocated GBP 2 million for labour abuse prevention, identifying labour exploitation and trafficking as pressing issues and pinpointing high-risk sectors in the UK labour market with about ten million workers. In its 2023 response, the GLAA reported no specific anti-trafficking funding but confirmed its investigative mandate in England and Wales. Its annual report for 2022/23 highlighted three modern slavery convictions, fifty-seven referrals to the National Referral Mechanism (NRM), and GBP 165,582 recovered for 4,598 workers affected by various exploitation issues, from wage discrepancies to severe labour exploitation and modern slavery allegations.²⁵

Departments and Agencies Related to Economic and Financial Systems, and Departments Operating at the Cross-Sectoral Level

Our longitudinal study included various UK government agencies related to economic and financial systems, such as the Competition and Markets Authority, Department for International Trade, Serious Fraud Office, and His Majesty's Revenue and Customs (HMRC). The Competition and Markets Authority,²⁶ focused on promoting competitive markets and addressing unfair practices, reported no involvement in combating human trafficking. The Department for International Trade, operational from 2016 to 2023, provided information only in its 2023 response, noting internal policies to prevent human trafficking within its supply chains. The Serious Fraud Office,²⁷ which handles major fraud, bribery, and corruption, offered no data on human trafficking efforts. The HMRC, citing

See 'What We Do - Regulation - Licensing Scheme - GLAA', n.d. https://www.gla.gov.uk/who-we-are/what-we-do and 'GLAA - New Powers - GLAA', n.d. https://www.gla.gov.uk/whats-new/press-release-archive/01072017-new-powers-for-law-enforcement-to-combat-slavery-and-labour-exploitation.

GLAA, Gangmasters and Labour Abuse Authority Annual Report and Accounts 1 April 2022 to 31 March 2023 (House of Commons Paper) HC 337, Dandy Booksellers under the Open Government Licence, 2024, https://www.gla.gov.uk/media/9983/e02945337_glaa-ara-22-23_elay.pdf, p. 8.

See 'Competition and Markets Authority', GOV.UK, 2024, https://www.gov.uk/government/organisations/competition-and-markets-authority.

²⁷ See 'Home', Serious Fraud Office, n.d., https://www.sfo.gov.uk/.

cost considerations, discussed its anti-trafficking roles, including a Strategic Lead for Modern Slavery and Human Trafficking and two Operational Support Officers. By 2020, HMRC had integrated anti-trafficking efforts into its standard operations, collaborating with law enforcement and other departments. In its 2023 response, HMRC reported no direct funding for these efforts, emphasising its supportive role in the government's anti-trafficking response without being an enforcement agency.

We approached the Department for Digital, Culture, Media and Sport and the Department for Communities and Local Government, anticipating their potential to integrate anti-trafficking efforts within their extensive remits. The Department for Communities and Local Government, renamed the Ministry of Housing, Communities and Local Government in 2018 and later the Department for Levelling Up, Housing and Communities in 2021, reported no relevant data or strategies. In 2018/19, it funded a GBP 1.1 million pilot via the Controlling Migration Fund for six local authorities to support victims transitioning from safe houses to community living. No further information or strategy was available for 2021/22 and 2022/23. The lack of funding for anti-trafficking initiatives aligns with the systemic defunding of local services through austerity policies since 2010.²⁸ The Department for Digital, Culture, Media and Sport provided no data in 2017/18, and its 2020/21 response mentioned staffing for anti-trafficking efforts (0.15 FTE combined). The 2023 response also lacked financial details, indicating a staff increase to 0.5 FTE combined. A 2020/21 modern slavery statement was shared, focusing on internal operations rather than broader government actions against modern slavery.

Central Government Departments and Agencies Working in the Fields of International Development, Migration, Policing, and Criminal Justice

This subsection examines government agencies involved in international development, including the Foreign, Commonwealth & Development Office (FCDO) and the defunct Department for International Development (DFID). DFID operated from May 1997 until September 2020, managing the UK's foreign aid to reduce global poverty before merging with the Foreign and Commonwealth Office to form the FCDO. DFID did not specify direct funding allocations for anti-trafficking for 2015/16 and 2016/17 due to the cost of identifying the data, but acknowledged funding overseas programmes to combat human trafficking. These also included indirect support through education and livelihood training to reduce vulnerability to exploitation. While some programme details are available

We are not aware of any empirical studies that investigate the impact of austerity policies in the UK on the defunding of anti-trafficking initiatives at the local level.

on the UK government's Development Tracker,²⁹ disaggregating annual funding proved difficult. Notable initiatives included 'Work in Freedom 1', allocating GBP 1,198,163 in 2015/16 for partnership work in India, Nepal, Bangladesh, and the Persian Gulf States to prevent trafficking of women and girls. Another significant project, 'Aawaz II – Inclusion, Accountability and Preventing Modern Slavery Programme in Pakistan', aimed to create a more inclusive society and stronger government institutions.³⁰ By March 2024, this programme had committed GBP 66,825,682, covering activities from 2015 to 2022, with significant allocations to the British Council and UNICEE³¹

In 2020, DFID listed twenty-three projects but did not provide specific funding details. 'Work in Freedom 1' received GBP 10,384,774 between 2013 and 2019 to prevent trafficking through empowerment in India, Bangladesh and Nepal. ³² The second phase of the project, 'Work in Freedom 2' allocated GBP 10,151,563 between 2018 and 2024 to reduce vulnerability to exploitation and trafficking in South Asia and parts of the Middle East, although DFID did not directly mention this phase in their response. ³³ The 'Responsible Accountable and Transparent Enterprise – RATE' project provided GBP 30,065,315 from 2015 to 2020³⁴ to help businesses manage their social and environmental impacts, notably funding B Lab³⁵ and other NGOs focused on ethical trading and reporting. RATE's outcomes saw over 18,000 companies adopt ethical codes and 2,000 assessed for their impact on the Sustainable Development Goals (SDGs). However, the tangible impacts of these investments, such as the specific number of cases of exploitation and/or trafficking cases identified or prevented due to increased awareness, remain unclear.

A UK government website which 'shows in detail the international development programmes led by the Foreign, Commonwealth and Development Office (FCDO), other government departments and partners', see 'Development Tracker', n.d., https://devtracker.fcdo.gov.uk/.

See 'DevTracker Programme GB-1-204605', n.d., https://devtracker.fcdo.gov.uk/programme/GB-1-204605/summary.

See 'DevTracker Programme GB-1-204605 Transactions', n.d., https://devtracker.fcdo.gov.uk/programme/GB-1-204605/transactions.

See 'DevTracker Programme GB-1-203857 Transactions', n.d., https://devtracker.fcdo.gov.uk/programme/GB-1-203857/transactions.

See 'DevTracker Programme GB-GOV-1-300551', n.d., https://devtracker.fcdo.gov.uk/programme/GB-GOV-1-300551/summary.

See 'DevTracker Programme GB-1-203448', n.d., https://devtracker.fcdo.gov.uk/programme/GB-1-203448/summary.

³⁵ See 'About B Lab', n.d., https://www.bcorporation.net/en-us/movement/about-b-lab.

Following the DFID merger into the FCDO in 2023, no further information was provided. FCDO was created in 2020 to promote the UK's interests and address global challenges like poverty. 36 In 2017, the FCDO mentioned its crossgovernment efforts and the establishment of a Modern Slavery Unit without providing funding details. By 2020, the FCDO had spent GBP 1.48 million to combat human trafficking, focusing on reducing the 'flow of slavery to the UK' and enhancing international cooperation. The annual Human Rights and Democracy reports of 2018 and 2019 noted a significant increase in UK funding to combat human trafficking, promising over GBP 200 million without providing specific details.³⁷ These funds supported initiatives including ethical public procurement, international collaborations, and anti-trafficking measures across supply chains, with additional support for data collection projects in Pakistan and Latin America. The FCDO allocated GBP 15,342,740 in 2021/22 for various initiatives, including efforts to end child exploitation and labour, and establishing the Global Commission on Modern Slavery and Human Trafficking. In 2022/23, the FCDO allocated GBP 14,775,208 for activities to combat human trafficking, including actions to support victims of sexual exploitation and additional funding towards the Global Commission on Modern Slavery and Human Trafficking.

It is beyond the scope of this paper to establish a correlation between specific anti-trafficking Official Development Assistance (ODA) allocations to specific countries and the number of individuals from these nations identified in the UK's NRM as potential or confirmed victims of human trafficking. This could be explored in future research. Nevertheless, human trafficking and 'modern slavery' concerns are now integral to the discourse surrounding the UK's overseas development assistance. For example, the 2022 *Human Rights and Democracy* report by the FCDO³⁸ discusses 'modern slavery' within the human rights framework across countries like Malaysia, Indonesia, Ethiopia, and South Africa. It also notes countries such as India, Albania, Vietnam, and Sudan, which are among the top ten nationalities for NRM referrals as of 2023.³⁹

See 'Foreign, Commonwealth & Development Office', GOV.UK, 2024, https://www.gov.uk/government/organisations/foreign-commonwealth-development-office.

³⁷ Foreign and Commonwealth Office, 'Human Rights and Democracy Report 2018', GOV.UK, 5 June 2019, https://www.gov.uk/government/publications/human-rights-and-democracy-report-2018 and Foreign and Commonwealth Office, 'Human Rights and Democracy Report 2019', GOV.UK, 16 July 2020, https://www.gov.uk/government/publications/human-rights-and-democracy-report-2019.

FCDO, 'Human Rights & Democracy Report 2022', GOV.UK, 13 July 2023, https://www.gov.uk/government/publications/human-rights-and-democracy-report-2022.

See 'Modern Slavery: National Referral Mechanism and Duty to Notify statistics UK, end of year summary 2023', GOV.UK, 7 March 2024, https://www.gov.uk/government/statistics/modern-slavery-nrm-and-dtn-statistics-end-of-year-summary-2023/modern-slavery-national-referral-mechanism-and-duty-to-notify-statistics-uk-end-of-year-summary-2023.

The second part of this subsection reviews anti-trafficking funding and initiatives by law enforcement and immigration control agencies, including the Home Office, the Independent Anti-Slavery Commissioner (IASC), the Ministry of Justice (MoJ), and the Crown Prosecution Service (CPS). The Home Office, central to the UK's strategy against human trafficking and modern slavery,⁴⁰ reported annual funding increases across three data collection waves. In 2015/16, it spent GBP 7,173,240.52 on policy development, victim support, and immigration control efforts. This included the Modern Slavery Unit's costs, support for the IASC, contributions to victim care contracts co-funded with the MoJ, the Child Trafficking Protection Fund, UK Border Force training, and training for the Office of the Children's Champion on child safety.

The 2016/17 expenditure of GBP 16,004,680.70 more than doubled the previous year's, covering the Modern Slavery Unit, the Safeguarding Unit's child trafficking focus, and the IASC's activities to promote best practices and victim identification. It also funded the Adult Victim of Modern Slavery Care Contract, delivered by the Salvation Army and co-funded by the MoJ, the Modern Slavery Fund, and the Child Trafficking Protection Fund. Additional initiatives included the roll-out of Independent Child Trafficking Advocates, a trilateral conference in Warsaw with Poland and Lithuania, and Police Transformation Fund contributions to enhance the policing response to human trafficking in England and Wales.

The response also references the 2015 and 2016 reports of the Inter-Departmental Ministerial Group on Modern Slavery highlighting the Home Office's commitment to combating human trafficking. The 2016 report recognises human trafficking as a critical issue, noting efforts to improve victim identification, prosecute perpetrators, and implement anti-slavery legislation. While it notes root causes like instability and conflict, the report primarily focuses on legal, enforcement, awareness, and victim support rather than directly addressing broader structural issues like poverty or inequality.

See Home Office, 'Home Office Modern Slavery Statement 2020 to 2021 (Accessible Version)', GOV.UK, 25 November 2021, https://www.gov.uk/government/publications/home-office-modern-slavery-statement-2020-to-2021/home-office-modern-slavery-statement-2020-to-2021-accessible-version.

Home Office, 'Report of the Inter-Departmental Ministerial Group on Modern Slavery 2015', GOV.UK, 21 October 2015, https://www.gov.uk/government/publications/report-of-the-inter-departmental-ministerial-group-on-modern-slavery-2015 and Home Office, 'Report of the Inter-Departmental Ministerial Group on Modern Slavery 2016', GOV.UK, 12 October 2016, https://www.gov.uk/government/publications/report-of-the-inter-departmental-ministerial-group-on-modern-slavery-2016.

The 2020 response indicated a continued increase in Home Office funding for anti-trafficking initiatives, with allocations rising from approximately GBP 16 million in 2016/17 to GBP 31 million in 2017/18, and GBP 39 million in 2018/19. The report highlighted an expanded range of funded activities, though it did not specify the exact distribution of funds. Ongoing projects included the UKVI NRM decision-making hub, IASC's office, the Victim Care Contract, Independent Child Trafficking Guardians, the Modern Slavery Unit, and the Police Transformation Fund grant. New initiatives in 2017/18 included the digital NRM system, public procurement training to avoid modern slavery in supply chains, the Business Against Slavery Forum, the Child Trafficking Protection Fund, and both the Modern Slavery and Modern Slavery Innovation Funds, emphasising an expanded approach to combating human trafficking.

Funding in 2018/19 supported activities aimed at 'transparency in supply chains' and prevention efforts including research and communications campaigns. The total direct government expenditure on combating human trafficking reached GBP 39 million in 2017/18 and GBP 61 million in 2018/19, as reported in the 2018 UK Annual Modern Slavery Report and the Independent Review of the *Modern Slavery Act.*⁴² The annual reports, while recognising socioeconomic vulnerabilities, primarily focused on criminal and operational challenges, citing lack of awareness, economic hardship, and organised crime as key causes. The reports advocated for solutions centred on law enforcement, victim support, awareness-raising, and international cooperation, continuing to stress operational, legislative, and protective measures without addressing deeper socioeconomic inequalities.

The 2023 response was less comprehensive than those in 2017 and 2020, omitting total Home Office funding allocations, with some details deferred. Mentioned activities included the Devolving Child Decision-Making Pilot initiated in 2021, Independent Child Trafficking Guardians, the Modern Slavery and Organised Immigration Crime (MSOIC) Unit, modern slavery victim support within the criminal justice system, GLAA, and contributions to the Modern Slavery Fund (MSF) at GBP 4.8 million in 2021/22 and GBP 5.6 million in 2022/23. The Modern Slavery Victim Care Contract (MSVCC) received GBP 62.2 million in 2021/22 and GBP 77.7 million in 2022/23, totalling GBP 67 million in 2021/22 and GBP 83 million in 2022/23 for both MSVCC and MSF. The increase in funding for these initiatives—from GBP 39 million in 2018/19 (for all antitrafficking activities funded by the Home Office) to GBP 83 million in 2022/23 (combined funding for MSVCC and MSF only with additional, undisclosed

Home Office, '2018 UK Annual Report on Modern Slavery', GOV.UK, 18 October 2018, https://www.gov.uk/government/publications/2018-uk-annual-report-on-modern-slavery and Home Office, 'Independent Review of the Modern Slavery Act: Final Report', GOV.UK, 22 May 2019, https://www.gov.uk/government/publications/independent-review-of-the-modern-slavery-act-final-report.

amount allocated to other activities)—was significant.

A direct comparison of anti-trafficking funding between 2012/13 and 2022/23 is challenging due to redacted data in the 2012/13 response. However, examining allocations to the Victim Care Contract, managed by the Salvation Army, shows a significant increase from just over GBP 3 million in 2012/13 to almost GBP 78 million in 2022/23—a 26-fold increase. This coincided with an increase in NRM referrals from 550 individuals in 2012/13⁴³ to 10,704 in 2022/23,⁴⁴ allowing for an indicative estimate of expenditure per person to determine whether the increase in contract value is proportionate to the rise in NRM referrals assisted by the organisation.

This measure is only indicative as the data do not align between the financial year (April to March) used for funding allocations and the Salvation Army's contractual year (June to July) used for reporting assisted individuals. It is unclear if the costs for supporting individuals already in the NRM system differ from those entering the service or vary geographically across England and Wales. No data are available on the proportion of costs allocated towards contract administration versus direct support to assisted individuals.

In 2012/13, GBP 3 million was allocated, supporting 550 individuals at an average cost of GBP 5,545 per person. In 2022/23, GBP 77.7 million was allocated, averaging GBP 7,259 per person. Factoring in inflation, GBP 5,545 in 2013 equates to GBP 7,741 in 2023 indicating a 7% real-term decrease in spending per person when adjusting for inflation, despite nominal increases in funding. This suggests that while the Victim Care Contract's value has risen annually, much of this increase is due to the growing number of victims assisted rather than higher individual support levels. This raises questions whether the increase in NRM referrals reflects better victim identification, or continuing government failures to address underlying issues like crime, poverty, and exploitation, or a combination of these factors.

The FOI requests were sent to the Office of the Independent Anti-Slavery Commissioner (IASC), established under the *Modern Slavery Act 2015* (MSA) with a UK-wide mandate to promote best practices in tackling human trafficking. The IASC's funding, as noted by the Home Office, is included within its total budget. The 2017 response, which lacked specific financial details, referenced the IASC's annual report disclosing a 2015/16 budget of GBP 494,836 for salaries

⁴³ 'Home Office modern slavery statement 2020 to 2021', p. 3.

No author, Behind the Shield: Protecting and supporting survivors of modern slavery, Salvation Army, 2023, p. 4.

⁴⁵ 'Inflation calculator', Bank of England, n.d., https://www.bankofengland.co.uk/monetary-policy/inflation/inflation-calculator.

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and operational expenses.⁴⁶ The report mentioned strategies focusing on victim care, law enforcement, international cooperation and private sector involvement; it identified criminal profits, population vulnerabilities, and exploitation of global crises as root causes of human trafficking. The budget increased to GBP 588,025 in 2016/17, with subsequent reports noting greater emphasis on partnerships and tackling labour exploitation and supply chain transparency.⁴⁷ The 2020 response lacked 2017/18 data, reporting a GBP 629,755 budget for 2018/19 but noted the absence of a Commissioner in post. The 2023 update indicated that following the Commissioner's departure in April 2022, the office was non-operational without budget or activity records until December 2023.

The Ministry of Justice (MoJ) and the Crown Prosecution Service (CPS) were also contacted regarding their anti-trafficking efforts. The MoJ confirmed it had no information on funding for these efforts, with a 2023 response still pending as of 2024. The CPS also reported a lack of dedicated funding or relevant data, but its 2023 update mentioned guidance for prosecuting under the MSA and a joint statement with the Attorney General's Office on preventing their supply chains from being implicated in human trafficking.

Table 1 collates anti-trafficking funding from UK central government agencies and departments to illustrate what appears to be a fragmented approach to funding anti-trafficking efforts at the central government level. This table should not be viewed as a definitive measure of any single agency's or the UK government's commitment to anti-trafficking due to methodological limitations such as FOI response accuracy and the challenge of distinguishing 'direct' anti-trafficking funds from broader initiatives that address exploitation, inequality, abuse, and violence as multifaceted structural issues. However, it does show how the UK government's interpretation of human trafficking (or 'modern slavery') tends to focus narrowly on human rights abuses 'abroad', immigration control 'at the border', and victim assistance 'at home'. This segmented view will be further discussed in the subsequent section.

⁴⁶ Independent Anti-Slavery Commissioner: Annual Report 2016', GOV.UK, 12 October 2016, https://www.gov.uk/government/publications/independent-anti-slavery-commissioner-annual-report-2016, p. 40.

⁴⁷ 'Independent Anti-Slavery Commissioner's Annual Report 2016 to 2017', GOV.UK, 16 October 2017, https://www.gov.uk/government/publications/independent-anti-slavery-commissioners-annual-report-2016-to-2017, p. 41.

Table 1: Summary of Anti-trafficking Funding Allocations by Central Government Departments and Agencies as Reported in Freedom of Information Responses

	2015/16	2016/17	2017/18	2018/19	2021/22	2022/23
Cabinet Office	NIP/NF*	NIP/NF	NIP/NF	£ 1,071,037.61	NIP/NF	NIP/NF
Competition and Markets Authority	Staff time (0.5 FTE)	NIP/NF	NIP/NF	NIP/NF	NIP/NF	NIP/NF
Department for Digital, Culture, Media and Sport	NIP/NF	NIP/NF	Staff time (0.15 FTE)	Staff time (0.5 FTE)	Staff time (0.5 FTE)	Staff time (0.5 FTE)
Crown Prosecution Service	NIP/NF	NIP/NF	NIP/NF	NIP/NF	NIP/NF	NIP/NF
Department for Business, Energy and industrial strategy (and successor)	NIP/NF	NIP/NF	NIP/NF	NIP/NF	NIP/NF	NIP/NF
Department for Communities and Local Government (and successors)	NIP/NF	NIP/NF	NIP/NF	£ 1.1million	NIP/NF	NIP/NF
Department for International Trade (and iterations)	NIP/NF	NIP/NF	NIP/NF	NIP/NF	NIP/NF	NIP/NF
Serious Fraud Office	NIP/NF	NIP/NF	NIP/NF	NIP/NF	NIP/NF	NIP/NF
Gangmasters and Labour Abuse Authority	£ 874.14	£ 15,596.80	£2 million in FY 2017 and 2018	£ 2 million in FY 2017 and 2018	NIP/NF	NIP/NF
Department for Work and Pensions	NIP/NF	NIP/NF	NIP/NF	NIP/NF	NIP/NF	NIP/NF
Foreign & Commonwealth Office (up until and including FY2018/19) and Foreign, Commonwealth & Development Office (starting from FY2021/22)	NIP/NF	NIP/NF	NIP/NF	£ 1.48 million Reference the overall ODA commitment to fight modern slavery of £ 200 million	£, 15,342,740	£ 14,775,208
Department for International Development	Refused on the basis of cost, referred to Devtracker	Refused on the basis of cost, referred to Devtracker	Refused on the basis of cost, referred to Devtracker	Refused on the basis of cost, referred to Devtracker	Merged with FCO (as FCDO)	Merged with FCO (as FCDO)

Independent Anti-	Refers to	Refers to	No data	£ 629,755	No	No
Slavery	the annual	the annual		(funded by	information	information
Commissioner	report:	report;		Home Office)	provided	provided
	£ 494,836	£ 588,025			since office	since office
	spent on the	spent on the			was non-	was non-
	operation of	operation of			functioning	functioning
	the Office	the Office				
	(funded	(funded				
	by Home	by Home				
	Office)	Office)				
HMRC	Refused on	Refused on	Refused on	Refused on the	NIP/NF	NIP/NF
	the basis of	the basis of	the basis of	basis of cost;		
	cost; staff	cost; staff	cost; staff	staff costs – 2		
	costs – 3	costs – 3	costs – 2	FTEs + 1 part-		
	FTEs	FTEs	FTEs + 1	time		
			part-time			
Ministry of Justice	NIP/NF	NIP/NF	NIP/NF	NIP/NF	No response	No response
Home Office	£,7 million	£, 16 million	£ 31 million	£ 39 million	Incomplete	Incomplete
	1				data: Modern	data: Modern
					Slavery	Slavery
					Fund &	Fund &
					Victim Care	Victim Care
					Contract:	Contract:
					£ 67 million	£ 83 million

*NIP/NF = no information held or provided, or confirmation of no dedicated funding

The data discussed above should be considered indicative rather than definitive. While FOI requests were standardised to encourage uniform responses, departments varied in their criteria for what constituted 'direct' anti-trafficking funding. To avoid misinterpretation, charts showing funding totals have been omitted. The data provide a snapshot of the scale of anti-trafficking funding, the specific interpretation of trafficking it legitimises and reinforces, and its dynamics over time. This sets the stage for analysis of how these allocations align with government policies on migration and crime control, discussed in the subsequent section.

The total anti-trafficking spend for the UK central government in 2022/23, as reported in the context of this study and taking into account various methodological limitations, can be estimated as GBP 98 million, a significant increase from almost GBP 21 million reported in 2012/2013.⁴⁸ However, direct comparison is difficult due to the complexity of funding structures, such as the multi-year nature of some Official Development Assistance projects, which complicates annual spend disaggregation. Despite the substantial increase in the

Sharapov, 2014, p. 36. The total amount reported in this article is USD 24,101,847; using an average exchange rate for 2014, when the article was published, this equals almost GBP 15 million; the Bank of England's inflation calculator adjusts GBP 15 million in 2014 to almost GBP 21 million in 2023. See https://www.bankofengland.co.uk/monetary-policy/inflation/inflation-calculator.

volume of funding, it remains unclear whether this increase has correspondingly enhanced the impact of the government's anti-trafficking efforts.

During the period covered in this article, until the end of 2020, the UK continued to contribute to the EU budget as part of the financial settlement between the UK and EU. A portion of this contribution, though not quantifiable due to the lack of detailed data, would have supported various anti-trafficking initiatives at the EU level. These included initiatives led by the EU Anti-Trafficking Coordinator, projects targeting non-EU countries, and efforts to protect workers' rights. These initiatives ceased following the UK's EU withdrawal. However, it was unexpected that the impact of Brexit or COVID-19 on anti-trafficking initiatives and funding was neither explicitly mentioned nor implied in the description of allocated funding in the FOI responses collected for this study.

Discussion

Modern Slavery 'Abroad', Modern Slavery at the UK Border, and Modern Slavery 'at Home'

We have argued elsewhere that the expansion of anti-trafficking activities often occurs despite—and sometimes because of—a failure to meet its stated goals. ⁴⁹ In the UK, government funding and the scope of the 'modern slavery' mandate have seemingly broadened in a way that might initially seem progressive as it encompasses a wider range of activities under its international development efforts. ⁵⁰ Originally, the UK addressed human trafficking and 'modern slavery' primarily as 'foreign' crimes and issues of 'illegal' migration aiming to intercept these before they reach the UK border. ⁵¹ More recently, it has included a selective focus on human rights in specific countries. This expansion might appear as a shift towards a rights-based approach, but this is misleading. Examining the UK government's allocation of anti-trafficking funding reveals a specific temporal and spatial pattern of selective recognition of human trafficking as a human rights concern: rights of would-be migrants matter only when they are still 'in

J Mendel and K Sharapov, 'Expanding Circles of Failure: The rise of bad anti-trafficking, and what to do about it', *Global Policy Journal*, 18 November 2021, https://www.globalpolicyjournal.com/blog/18/11/2021/expanding-circles-failure-rise-bad-anti-trafficking-and-what-do-about-it.

For an overview of the UK's aid, see P Loft and P Brien, 'The 0.7% Aid Target', UK Parliament, 2023, https://commonslibrary.parliament.uk/research-briefings/sn03714. For a discussion of the nationalisation and neoliberalisation of the UK aid (focusing on African countries), see M Lazell, 'UK Aid to Africa: "Nationalisation" and neoliberalism', Canadian Journal of Development Studies / Canadienne d'études Du Développement, 2023, pp. 1–20, https://doi.org/10.1080/02255189.2023.2166026.

⁵¹ Sharapov, 2017.

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place' in their home countries (before they are trafficked into the UK) with a focus on narrowly targeted micro-economic interventions like providing limited income-generating opportunities. This approach does not address broader structural factors that impoverish and disenfranchise many people, meaning these micro-projects, though commendable in annual reports, are unlikely to effect significant change.

The closer to the UK border trafficking occurs, both metaphorically and geographically, the more it transitions from a limited human rights issue to a matter of border, crime control, and immigration 'at home'. Irregular migrants in the UK have been deliberately stripped of protections that the NRM should offer, but the 2023 *Illegal Migration Act* prevents those who enter irregularly from accessing asylum or modern slavery support.⁵² Under former Prime Minister Rishi Sunak's leadership, the UK government faced criticism for deprioritising human trafficking,⁵³ particularly when he stated that the requirement for 'basic evidence' in modern slavery claims tripled the refusal rates by June 2023.

This approach shifts the focus from supporting 'victims' to emphasising the alleged crimes committed through irregular migration, prioritising punishment. This narrow interpretation of trafficking in the UK frames it as a foreign issue while domestically criminalising trafficked people who crossed the UK border irregularly, rendering them liable for deportation. Such an extension of the 'field' of human trafficking 'over there' accompanied by a violently narrow approach to trafficking 'at home' signifies a deliberate and calculated strategy. A selective emphasis on the human rights of people 'abroad' helps efface the ways in which the UK economy depends on people working in exploitative conditions (whether as part of supply chains or in underpaid casualised or informal jobs within the UK) and the current UK government's policy of deliberately criminalising and stripping rights from irregular migrants to the UK.⁵⁴

The analysis, shaped by both the availability and the completeness of the data, clearly suggests that UK government anti-trafficking funding has been consistently and significantly increasing, partly due to the rise in the number of presumed victims. However, this specific methodology does not permit a

See, for example, UN Migration, 'UK "Illegal Migration Bill" Exacerbates Risks for Survivors of Modern Slavery: IOM', International Organization for Migration, 28 March 2023, https://www.iom.int/news/uk-illegal-migration-bill-exacerbates-risks-survivors-modern-slavery-iom.

See, for example, H Bancroft, 'Modern slavery "less of a priority for Sunak's government" as watchdog budget cut by £100,000', *The Independent*, 7 February 2022.

J Mendel and K Sharapov, 'Human Trafficking and Online Networks: Policy, analysis, and ignorance', *Antipode*, vol. 48, issue 3, 2016, pp. 665–84, https://doi.org/10.1111/anti.12213.

confident identification of any subtle or structural changes in how this funding was distributed among the three distinct categories identified in the paper: antitrafficking efforts abroad, at the border, and at home. These expansions—in the volume of trafficking and what appears to be a more focused approach on the 'trafficking abroad' dimension—have occurred within a narrow and well-established conceptualisation of trafficking in the UK. This approach focuses on the dual objectives of deterring racialised 'others' from the UK border, and 'rescuing' (often via deportation) a limited group of victims who conform to the punitive and racialised governmental benchmarks of 'genuine' suffering.

Such 'evolution' in the UK anti-trafficking policy and approach glosses over systemic causes of trafficking and exploitation. Notably absent is a critique of the role that neoliberal economic policies and the capitalist system play, which, by prioritising profit maximisation and deregulation at the expense of workers' rights and protections, foster environments conducive to exploitation and trafficking.⁵⁵ This not only impedes efforts to eradicate human trafficking but also raises questions about the UK government's genuine commitment to addressing the issue that it has long claimed to prioritise. Anti-trafficking activities are able to expand and broaden in scope precisely through these failures: UK government policy and practice help to create an 'intractable' problem (in part through attacks on the human rights of some groups within the UK) while also looking to address this problem through a developing emphasis on the human rights of trafficked and vulnerable people 'abroad'.

The UK government continues to put its anti-trafficking money where its mouth is, but what is coming out of this mouth is increasingly fractured and fragmented. Human trafficking projects abroad emphasise human rights, with the government's international strategy evolving to include limited and targeted interventions such as enhancing legal frameworks, raising awareness, economically empowering communities and individuals, and collaborating with local NGOs and the private sector. This approach marks a shift from earlier oversimplifications that attributed human trafficking solely to criminal networks and impoverished individuals inhabiting 'uncivilised, undemocratic and impoverished spaces out there'. Although these initiatives still aim to un-make victimhood at the individual level—through awareness-raising or sustainable livelihood opportunities—they remain limited in scope. Both at and within the UK's borders, anti-trafficking policy continues to frame trafficking as an individual crime or victimhood, while other government policies simultaneously undermine the human rights of irregular migrants and render citizens and residents vulnerable to exploitation.

⁵⁵ *Ibid.*; Mendel and Sharapov, 2024.

⁵⁶ Sharapov, 2017, p. 102.

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Repoliticising Anti-Trafficking Funding (and Defunding)

The expanding conceptualisation of anti-trafficking, reflected in changes to UK anti-trafficking funding, contribute to its depoliticisation. Mendel and Sharapov argue that anti-trafficking can be 'perceived as non-partisan or above the fray of party politics precisely *because* it fails to confront the "normal" exploitation of labour...[and] fails to engage with the political issues surrounding routine exploitation in daily life'.⁵⁷ In the UK, there is a largely depoliticised consensus that human trafficking, or 'modern slavery', is a 'barbaric crime'⁵⁸ and that supporting individual 'victims' is commendable. This consensus can also be perceived as non-partisan because it overlooks routine labour exploitation in the UK and fails to address key political questions around the systemic causes of trafficking or the harms done by state actions.

For some politically contested policies related to trafficking—for example, the now defunct plans to deport unauthorised migrants to Rwanda—this contestation is presented as separate from the non-partisan consensus on anti-trafficking and is largely framed as a political disagreement about migration rather than disrupting the consensus on anti-trafficking. This seemingly 'reasonable' or 'normal' consensus enables fractured discourses and policies around UK anti-trafficking funding, leading to harmful outcomes for trafficked individuals and maintaining a 'centre ground' that overlooks crucial political issues around exploitation. As Bhagat and Quirk note, former UK Home Secretary and Prime Minister Theresa May was able to establish a Global Commission on Human Trafficking and Modern Slavery, which draws on this depoliticised consensus around anti-trafficking, in order to avoid key political questions on topics such as migration and corporate power. They also note that May's own political decisions made many more vulnerable to exploitation. ⁵⁹ UK government anti-trafficking funding is able to expand despite or because of repeated failures, even as policies on issues like irregular migration, welfare and poverty contribute to these very failures. ⁶⁰

Rather than accepting a depoliticised consensus view that simplistically frames all anti-trafficking activities as inherently positive, research on UK policy should give greater attention to more politically contentious issues like migration, benefits

Mendel and Sharapov, 2024, p. 58.

No author, 'New UK action against modern slavery protects women at risk from trafficking in Med', GOV.UK, 2 December 2016, https://www.gov.uk/government/news/new-uk-action-against-modern-slavery-protects-women-at-risk-from-trafficking-in-med.

A Bhagat and J Quirk, 'Do we really need a Global Commission on Modern Slavery?', openDemocracy, 10 April 2024.

⁶⁰ Mendel and Sharapov, 2021.

policy, and workers' rights within the UK, moving away from depoliticised and fractured anti-trafficking discourses. While our call for repoliticisation links into broader political and ideological debates, engaging with political questions about anti-trafficking is also crucial for more 'pragmatic' inquiries into how anti-trafficking funds can be used effectively. It is neither effective nor efficient for a government to allocate large sums of money towards futile attempts to implement clashing policy objectives. Discussions on 'what works' in anti-trafficking must not therefore shy away from engaging with political and politicised issues.

In the context of both a repoliticised discussion and debates about 'what works', defunding useless and/or harmful anti-trafficking and anti-migration work should be on the agenda. 61 In examining anti-trafficking efforts following Russia's invasion of Ukraine, we found that significant impact came from states refraining from harmful practices towards refugees. For example, not preventing Ukrainian refugees from crossing borders and not criminalising them for migrating or working proved crucial, and allowed them to access legal work alongside 'normal' state services like healthcare and welfare. 62 Attention should shift towards the anti-trafficking potential of defunding activities that make people more vulnerable to exploitation. For instance, defunding immigration enforcement activities that make migrants' work and living situations in the UK unnecessarily precarious and increase their exploitation risk could have a more positive impact than spending money on addressing trafficking as an individualised issue of crime. The UK could defund the work of immigration enforcement and police to detain and deport unauthorised migrants where this is done for no reason other than their migration status. It could also stop spending money on enforcing laws and regulation that make migrants' situations more vulnerable: for example, ending workplace raids that are focused just on immigration enforcement.

Focusing on defunding harmful state activities offers two major benefits: first, eliminating harmful activities is intrinsically beneficial, irrespective of how the funds are reallocated; and second, re-evaluating funding priorities could free up hundreds of millions of pounds that could significantly benefit trafficked, exploited, or otherwise vulnerable individuals.

Some anti-trafficking activities, including punitive immigration enforcement or (the now withdrawn) preparations to deport unauthorised migrants to Rwanda, would be beneficial to defund even if the money saved were not redirected. Given

⁶¹ Ibid. As discussed in Mendel and Sharapov, 2024, we acknowledge that various state-funded activities are important for individuals who might otherwise be susceptible to trafficking and exploitation—from providing access to welfare and healthcare to upholding workers' rights. However, these actions are not typically classified under the umbrella of 'anti-trafficking'.

⁶² Mendel and Sharapov, 2024.

the substantial possible benefits of such defunding, we would argue that the focus of much anti-trafficking research should shift from how money is spent to what might be achieved by eliminating harmful practices.⁶³

Moreover, the saved funds could be used to replace harmful activities with beneficial ones, such as making migrants less vulnerable to exploitation through enhanced homelessness prevention services, welfare rights, language skills for recent migrants, or improving worker protections through enhanced labour inspection and a welfare system that is less likely to impoverish people. Additionally, we would call for more work on how state and NGO anti-trafficking funding might more effectively be reallocated towards more decentralised efforts to reduce the vulnerability of marginalised groups, such as mutual aid projects or redistributing money directly as an unconditional basic income.

Conclusion

Drawing on Freedom of Information requests, this paper illustrates the fractured expansion of UK government anti-trafficking funding. As spending increases, a divide in anti-trafficking discourse and funding allocation emerges. On one hand, there is a limited focus on protecting the human rights of vulnerable individuals 'abroad' to prevent their migration or trafficking into the UK. On the other hand, once these individuals reach the UK, the focus shifts to criminalisation and eroding their human rights. The allocation of anti-trafficking funds by the UK government reflects a practical manifestation of its anti-trafficking policy discourses. While the fractured discourses of anti-trafficking policy discussed above are of academic interest in themselves, they also have very real practical effects since they shape which anti-trafficking activities are prioritised as the government continues to 'put its money where its mouth is'.

The need for critical anti-trafficking work is clear—not only to improve (academic) understanding of anti-trafficking policy but also to critique and influence discourses to ensure effective use of anti-trafficking funds. Much attention focuses on how non-state organisations use often-limited budgets on anti-trafficking work with marginal benefits. This paper argues for refocusing research on anti-trafficking funding to prioritise identifying and potentially defunding harmful state activities. Defunding these activities could significantly reduce vulnerability to exploitation and free up funds for more productive uses. Despite allocating funds to seemingly progressive anti-trafficking measures, the UK simultaneously invests in projects that increase vulnerability of already at-risk groups, causing further harm. Therefore, discussions on anti-trafficking funding should not only

⁶³ Mendel and Sharapov, 2021.

assess the efficacy of initiatives but also consider the benefits of withdrawing funding from harmful state activities.

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US Anti-Trafficking Funding and the Discourse of 'Prevention'

Laura A. Hebert

Abstract

The United States government has positioned itself as the global exemplar in the anti-human trafficking arena, including through its unparalleled financial support for domestic and international anti-trafficking activities. How the US has allocated these funds has not previously been systematically studied. Building on original databases compiled through a review of the US Attorney General's Annual Report to Congress on US Government Activities to Combat Trafficking in Persons for fiscal years 2017–2021, in this article, I offer a detailed analysis of US anti-trafficking funding allocations. I find that during the five-year period under review, the vast majority of US anti-trafficking funds were spent on reactive activities, including the identification, protection, and support of trafficking survivors and efforts to improve the detection, arrest, and prosecution of traffickers. In contrast, activities targeting the conditions that increase precarity, rendering certain populations at heightened risk of being trafficked, or that enable the exploitation of precarity, were relatively under-funded. When these conditions were addressed by funded activities, the targets were nearly always countries in Africa, Asia, or Latin America, perpetuating a discourse of trafficking as a social problem rooted in poor policies, practices, and inequalities seen as endemic in the Global South.

Keywords: United States, prevention, anti-trafficking, funding, public health, migration, precarity, private sector

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Introduction

Which country will put its power and resources into this fight to help the world's weakest achieve freedom? Which country will risk alienating others by reporting openly what's going on and holding out the possibility of aid sanctions to encourage action? There is only one answer to the question of which country must lead: it is the United States of America.¹

This quote encapsulates the United States' positioning of itself as the global exemplar in the anti-human trafficking arena. The 2000 United Nations (UN) Protocol to Prevent, Suppress, and Punish Trafficking in Persons, Especially Women and Children established globally agreed upon anti-trafficking standards in the areas of prevention, protection, and punishment, and it remains the most significant legally binding international treaty on trafficking adopted to date. It lacks, however, an enforcement capacity to ensure states parties are sufficiently motivated to fulfil their obligations under the treaty, which left space for the US to insert itself as the de facto global anti-trafficking enforcer. Each year, the US ranks the performance of states around the world in meeting its own anti-trafficking requirements as established under the 2000 US Trafficking Victims Protection Act (TVPA), with the possibility of sanctions being imposed against those that fail to meet its standards. The US is also unparalleled in its financial support for anti-trafficking activities both domestically and internationally, another avenue through which it has shaped related laws and policies far beyond its borders.

How the US has allocated these funds has thus far not been systematically studied. Numerous scholars have emphasised how US anti-trafficking efforts since the enactment of the TVPA have privileged criminalisation-oriented responses, the

¹ 'Swearing-in of John R. Miller as Senior Advisor to the Secretary of State and Director of the Office to Monitor and Combat Trafficking in Persons', US Department of State, 4 March 2003, retrieved 18 July 2019, https://2001-2009.state.gov/g/tip/rls/rm/18200.htm.

Each year, the US Department of State produces a *Trafficking in Persons Report* that identifies the categories into which states are placed (Tier 1, Tier 2, Tier 2 Watch, and Tier 3) depending on whether they are determined by the US to have made a concerted effort to fulfil minimum standards established under the TVPA. (See, for example, US Department of State, *Trafficking in Persons Report*, June 2023, Washington, D.C., pp. 69–73, 85). Tier 3 states—i.e. those that fall short of these minimum standards and are doing little to correct this—may be subject to the withholding of 'non-humanitarian, non-trade-related foreign assistance.' (US Congress, *Trafficking Victims Protection Act* of 2000, 106th Cong., Public Law 106-386, 2000, Section 110(a)). However, in practice, many Tier 3 states are not penalised because the US president is authorised to waive sanctions when doing so is determined to be in the US' national interest (Section 110(d)(4)).

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combatting of sexual versus non-sexual forms of trafficking,³ and the protection of 'ideal victims'⁴—those deemed to be blameless for their experiences of exploitation. Scholars have also documented the negative ripple effects of the US Congress's decision in its 2003 reauthorisation of the TVPA to withhold funding from recipients unless they verified their opposition to commercial sex and its legalisation.⁵ The distribution of US anti-trafficking funds has not, however, been the focal point of this research. A partial exception is Martina Ucnikova's contribution to the *Anti-Trafficking Review's* 2014 special issue on anti-trafficking spending, in which she presented data on anti-trafficking donor funding by members of the Organisation for Economic Co-operation and Development (OECD) between 2003 and 2012, inclusive of the US. Her focus, however, was on determining the cumulative level of donor and OECD funding rather than tracking the specific activities funded, with her article confirming the need for more 'comprehensive data ... to clarify the direction of anti-slavery spending flows.'⁶

A W Peters, Responding to Human Trafficking: Sex, Gender, and Culture in the Law, University of Pennsylvania Press, Philadelphia, 2015, pp. 67, 195; R Weitzer, "The Social Construction of Sex Trafficking: Ideology and Institutionalization of a Moral Crusade', Politics & Society, vol. 35, no. 3, 2007, pp. 447–475, https://doi.org/10.1177/0032329207304319; C S Vance, 'States of Contradiction: Twelve Ways to Do Nothing About Trafficking While Pretending to', Social Research, vol. 78, no. 3, 2011, pp. 933–948, https://doi.org/10.1353/sor.2011.0039.

M Wilson and E O'Brien, 'Constructing the Ideal Victim in the United States of America's Annual Trafficking in Persons Reports', *Crime, Law and Social Change*, vol. 65, issue 1–2, 2016, pp. 29–45, https://doi.org/10.1007/s10611-015-9600-8; E O'Brien, *Challenging the Human Trafficking Narrative: Victims, Villains, and Heroes,* Routledge, New York, 2019.

A Ahmed and M Seshu, "We have the right not to be 'rescued'...": When Anti-Trafficking Programmes Undermine the Health and Well-Being of Sex Workers', Anti-Trafficking Review, issue 1, 2012, pp. 149–165, https://doi.org/10.14197/atr.201219; E C Kinney, 'Appropriations for the Abolitionists: Undermining Effects of the US Mandatory Anti-Prostitution Pledge in the Fight against Human Trafficking and HIV/AIDS', Berkeley Journal of Gender, Law & Justice, vol. 21, issue 1, 2006, pp. 158–194, https://doi.org/10.15779/Z38S17SS0N. The US Supreme Court has since ruled that this policy violates the First Amendment right to freedom of speech and is unconstitutional. However, the US Constitution only applies to US nationals and therefore the policy continues to be in force for foreign funding recipients (US Supreme Court, USAID et al. v. Alliance for Open Society International, Inc., et al., 570 US, 205, 20 June 2013; US Supreme Court, USAID, et al. v. Alliance for Open Society International, Inc., et al., No. 19–177, 29 June 2020).

M Ucnikova, 'OECD and Modern Slavery: How Much Aid Money is Spent to Tackle the Issue?', *Anti-Trafficking Review*, issue 3, 2014, pp. 133–150, https://doi.org/10.14197/atr.20121437.

In this article, I contribute to knowledge on trafficking-related spending, building on original databases compiled through a systematic review of the US Attorney General's Annual Report to Congress on US Government Activities to Combat Trafficking in Persons⁷ (hereinafter AG's reports) for fiscal years 2017 through 2021, 8 which allow for a detailed analysis of US anti-trafficking funding allocations. During the five-year period under review, the vast majority of US anti-trafficking funds were spent on reactive activities, including the identification, protection, and support of trafficking survivors and efforts to improve the detection, arrest, and prosecution of traffickers. Guided by Judith Butler's understanding of precarity as the 'politically induced condition in which certain populations suffer from failing social and economic networks of support and become differentially exposed to injury, violence, and death', I find that projects targeting the conditions that increase precarity, rendering certain populations at heightened risk of being trafficked, or that enable the exploitation of precarity, were, in contrast, relatively under-funded by the US government. When these conditions were addressed by funded activities, the targets were nearly always countries in Africa, Asia, or Latin America, perpetuating a discourse of trafficking as a social problem rooted in poor policies, practices, and inequalities seen as endemic in the Global South.

Methodology

Diverging from the unified definition of human trafficking established under the UN Trafficking Protocol, the US TVPA makes a definitional distinction between 'severe forms of trafficking in persons' and 'sex trafficking'. Severe trafficking includes 'sex trafficking in which a commercial sex act is induced by force, fraud, or coercion, or in which the person induced to perform such act has not attained 18 years of age', or 'the recruitment, harbouring, transportation, provision, or obtaining of a person for labour or services, through the use of force, fraud, or coercion for the purpose of subjection to involuntary servitude, peonage, debt bondage, or slavery.' The definition of sex trafficking drops the requirement of force, fraud, or coercion, and essentially equates commercial sex acts with sex trafficking—albeit trafficking that is not considered to warrant the protection or support of the state.

⁷ The US government's fiscal year begins on 1 October and ends on 30 September. This article therefore covers anti-trafficking activities supported by the US federal government between 1 October 2016 and 30 September 2021.

The Attorney General's reports for fiscal years (FY) 2003 to 2021 may be found at https://www.justice.gov/humantrafficking/resources#reports.

⁹ J Butler, Frames of War: When is Life Grievable?, Verso, New York, 2016, p. 25.

¹⁰ See US Congress, Section 103(8).

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The AG's reports offer the federal government's most comprehensive record of the domestic and international activities it funds in a given year to respond to offences that fall within the TVPA's category of 'severe trafficking'. These reports provide data on federal agency-supported investigations, arrests, prosecutions, and convictions for human trafficking-related offences, as well as information on assisted 'victims', '11 including foreign 'victims' and their family members who have applied for and been granted immigration relief. Most valuable for the present study, however, the AG's reports offer detailed information on federal government funds obligated during a given fiscal year for anti-trafficking projects, inclusive of the recipients, amounts, and purposes of specific awards.

Anti-trafficking activities pursue a range of objectives that may broadly be broken down into three categories: (1) those that offer an immediate response to trafficking that has occurred, including through detecting situations of trafficking, removing trafficked persons from these situations, and providing them with crisis support such as medical care, counselling, shelter, and legal aid; (2) those that seek to prevent the reoccurrence of trafficking through offering survivors long-term support to prevent their revictimisation and improving the investigation and prosecution of perpetrators to preclude their ability to continue their exploitation of others; and (3) those that seek to prevent trafficking from occurring in the first place, which requires addressing the complex social, economic, and political forces that drive it.¹² As recognised by the US government itself, the latter typically includes research that aims to illuminate trafficking trends and root causes; awareness campaigns targeting the public or at-risk populations; and efforts to address social discrimination and inequalities that heighten the risk of trafficking. It also requires paying attention to the factors enabling traffickers and other beneficiaries of trafficking who profit from exploitation. This includes reforming migration laws and policies that limit legal employment opportunities and 'increase the reliance of migrants on dangerous and illicit modes of entry'; ending unethical labour recruitment; reforming business practices that profit from social inequalities; and addressing the lack of legal accountability for private sector actors that benefit from exploitative labour practices.¹³

US federal documents on trafficking, including the AG's annual reports, employ the language of 'victim' rather than survivor. 'Victim' will be in quotes in this article to recognise that not all those who have survived trafficking experiences would self-identify as victims.

M Chisolm-Straker and K Chon (eds.), *The Historical Roots of Human Trafficking: Informing Primary Prevention of Commercialized Violence*, Springer, New York, 2021.

L A Hebert, Gender and Human Rights in a Global, Mobile Era, Routledge, New York, 2022, pp. 205–206. For confirmation of the US government's acknowledgement of the drivers of trafficking, see US Department of State, Trafficking in Persons Report, Washington, D.C., 2015, pp. 14–24; US Department of State, Trafficking in Persons Report, Washington, D.C., 2011, pp. 18–29.

I undertook a systematic review of the AG's reports for fiscal years 2017 through 2021—the five most recent annual reports presented to Congress by the Department of Justice (DoJ) at the time of writing. The objective was to analyse the domestic and international anti-trafficking activities most recently funded by the federal government in light of the current understanding of its main drivers. Individual databases were created for each of the five fiscal years, with the databases disaggregating information for every funded project listed in the reports, including the granting federal agency, the award recipient, and the amount awarded. Projects were coded by recipient type, the geographic region covered, the form of trafficking targeted, and the specific activities covered by the project objectives. Gaps in information were filled through the consultation of supplementary sources, including federal agency grant announcements and awards descriptions, recipient websites and annual reports, and internal and independent evaluations of the activities funded. Each AG report was reviewed by at least two researchers and then reviewed a third time by the author to ensure consistency in coding across awards, including for grants spanning multiple years.

The database analysis has been influenced by Butler's conceptualisation of precarity. *Precariousness* is, for Butler, intrinsic to who we are as human beings—a mutual condition born of the social context within which we exist, where 'one's life is always in some sense in the hands of others', with our lives 'impinged upon by the exposure and dependency of others, most of whom remain anonymous'. While precariousness is universally shared, *precarity* is distributed unequally, with some lives acknowledged as valued and grievable while others are not, the recognition of which ethically demands that we 'centre the structures and institutions upholding unequal relations of privilege and disadvantage and the norms inhibiting our ability to perceive the injury to, or death, of all lives as deserving of outrage and mourning'. 15

Applying this understanding of precarity to human trafficking, each project identified in the AG's reports was categorised as focusing on the immediate response to already occurring trafficking, longer-term action to limit the reoccurrence of trafficking, or prevention of the occurrence of trafficking. The first two categories of activities are essential for addressing individual experiences of trafficking, ensuring the well-being of survivors, improving civil and criminal responses to trafficking, and holding perpetrators accountable. Investments toward preventing trafficking from occurring in the first place, however, are arguably even more vital if the factors that increase precarity and enable exploitation are to be disrupted, which would also favourably reduce the demand for costly reactive activities. This article therefore pays close attention to the US government's funding of activities that aim to prevent the occurrence of

¹⁴ Butler, p. 14.

¹⁵ Hebert, p. 113, building on Butler, p. xxx.

trafficking, further analysing and coding these activities to differentiate between those that did and did not include at least one activity that directly aimed to diminish the social, economic, and political conditions that heighten precarity and the risks of being trafficked or enable the exploitation of precarity.

Despite the US government's rather open documentation of its anti-trafficking awards in the AG's reports, the ability of the present study to offer an exact accounting of its funding allocations is limited by the difficulty of separating trafficking-related efforts from government activities that have broader objectives. For example, government funding for international development and national and international security more generally may reduce threats or acts of trafficking by increasing the access of precarious populations to education, livelihood support, and humanitarian aid without being able to isolate their specific antitrafficking impact. Similarly, financial investments in policing and the criminal justice system more generally may have the effect of increasing trafficking-related investigations, prosecutions, and convictions, even if this is not an established objective. It is also important to note that the federal government is not the only funder of anti-trafficking activities in the US. States and local governments support anti-trafficking activities, as do private foundations. Nevertheless, the federal government's laws and policies have informed the national anti-trafficking framework, which influences funding decisions at state and local levels. The federal government is also responsible for setting policies and enforcing laws on human trafficking that have implications well beyond US borders, including those relating to the management of global supply chains, migration and migrant labour, labour recruitment, and private sector labour practices. The AG's reports flag the activities the US government itself explicitly recognises to be part of its domestic and international anti-trafficking efforts, valuably offering documentation of its funding priorities.

Findings

In her 2014 article, Ucnikova found that in the period between 2003 and 2012, twelve donor countries from the OECD, including the US, had collectively spent an average of USD 124 million each year on efforts to counter trafficking. Since then, US funding in this area has expanded dramatically. Between fiscal years 2017 and 2021, the US alone allocated more than USD 1.2 *billion* to fund 1,582 domestic and international projects, with an average of USD 248 million spent each year on anti-trafficking activities. 17

¹⁶ Ucnikova, p. 141.

Adjustments have been made to the data to account for duplicated projects within and across individual reports, as well as for projects identified in the narrative section of the AG's report but missing in the list of funded projects in the appendix,

Two government departments—the DoJ and the Department of State (DoS)—awarded two-thirds of the grants during this period, totalling more than USD 835 million. More than half of all recipients were non-profit organisations (55%), collectively awarded USD 658 million; among these, faith-based non-profits received more than USD 110 million. Activities targeting US citizens and foreign nationals in the US comprised nearly half of all funding (USD 606 million or 49%).

Regionally, governments and organisations in Asia received USD 198 million or 16% of the total funds awarded, followed by those in Latin America and the Caribbean (USD 136 million or 11%), Africa (USD 92 million or 7.4%), Eastern Europe (USD 24 million or 1.9%), and Western Europe and other states (USD 10 million or 0.8%). Activities that were globally focused or that stretched across more than one region accounted for 14% of total funds spent (USD 173 million).

The vast majority of project descriptions, 82%, did not single out a specific form of trafficking targeted by funded activities. Among those that did, sex trafficking-related activities made up the largest percentage (12% of all projects), followed by non-sexual forms of forced labour such as domestic work and agricultural labour (5.6%). Child soldiers were the focus of only eight projects over the five fiscal years, despite the US' passage of the *Child Soldiers Prevention Act* in 2008, which requires the DoS to include a list of governments confirmed to have employed child soldiers in the previous fiscal year in its annual *Trafficking in Persons* report.¹⁹

Funded projects often had multiple activities, with objectives that included responding to already occurring trafficking or preventing the first instance of trafficking. Among the projects funded, 61% were focused exclusively on immediate or long-term responses to trafficking that has already occurred, accounting for USD 676 million (55% of total funding). These projects most often aimed to identify trafficked persons or offer 'victims' crisis, transitional, and long-term support. Across all projects, 76% included at least one activity that involved the identification or assistance of trafficking 'victims'.

Thirty-nine percent of funded projects included at least one component targeted at preventing the occurrence of trafficking, accounting for USD 563 million (or 45%) of total spending. The database analysis further differentiated between those prevention-oriented projects that did and did not include at least one activity that was directly intended to reduce precarity, and thus the risks of being trafficked, or

contributing to minor differences in some cases from the estimates provided by the federal government.

This regional classification is based on the United Nations' regional grouping system: https://www.un.org/dgacm/en/content/regional-groups.

The Child Soldiers Prevention Act of 2008, Public Law 110-457 (Title IV), 23 December 2008, Sec. 404(a)(b)(1).

conditions that enable the exploitation of precarity. Activities that do not directly seek to reduce precarity or the enablers of the exploitation of precarity include research, public awareness campaigns, creating or reforming anti-trafficking laws, expanding government awareness of the problem of trafficking (including in border control and criminal justice systems), and enhancing stakeholder coordination. Those that do seek to reduce precarity include efforts to transform discriminatory social norms and practices that perpetuate precarity, expanding livelihood opportunities for poor and marginalised communities, reducing demand for goods and services employing trafficked labour (both sexual and non-sexual), reforming xenophobic laws and policies that increase the reliance of migrant workers on unsafe modes of transport and border crossings, eliminating labour recruitment fees, monitoring the compliance of corporate actors with human rights standards in the sourcing and treatment of their workers, and working to correct the practices of corporate actors that are failing to achieve those standards (including through judicial processes and worker-centred initiatives).20 Most of the projects that included a preventive component also involved attention to 'victim' protection and support or enhanced government responsiveness to already-occurring trafficking, making it difficult to single out the government's financial commitment for particular desired outcomes. However, separating out activities that do and do not directly target the structural conditions that increase precarity or disrupt the institutions and practices that support the exploitation of precarity is useful for helping to illuminate where the government's priorities lie and how its efforts to eradicate trafficking should be reformed.

Among all projects funded from financial years (FY) 2017 to 2021, 13% were *solely* focused on the prevention of the first instance of trafficking, accounting for USD 203 million (16.4% of total funding). USD 73 million of this funding was devoted to research projects that aimed to identify trafficking patterns or understand their root causes.²¹ This was followed by public awareness raising, which included a

For analyses of how these interventions reduce precarity, see S Cameron and E Newman, 'Trafficking in Humans: Structural Factors', in S Cameron and E Newman (eds.), Trafficking in Humans: Social, Cultural and Political Dimensions, United Nations University Press, New York, 2008, pp. 21–57; H Lewis and L Waite, 'Asylum, Immigration Restrictions and Exploitation: Hyper-Precarity as a Lens for Understanding and Tackling Forced Labour', Anti-Trafficking Review, issue 5, 2015, pp. 49–67, https://doi.org/10.14197/atr.20121554; B Anderson, Us & Them? The Dangerous Politics of Immigration Control, Oxford University Press, New York, 2013; G LeBaron, 'The Role of Supply Chains in the Global Business of Forced Labour', Journal of Supply Chain Management, vol. 57, issue 2, 2021, pp. 29–42, https://doi.org/10.1111/jscm.12258.

Academic institutions were the recipient of many of these funds. For example, in 2019, the University of Georgia Research Foundation received USD 15.75 million to expand an Africa-based research initiative to improve efforts to curb trafficking. The foundation received an additional USD 4 million for this initiative in 2020. See US

range of activities that collectively were allocated more than USD 22 million.²² Among the remainder of the funded activities focused exclusively on preventing the occurrence of trafficking, USD 4 million was allocated to projects intended to expand trafficking awareness among government actors; USD 6.2 million to projects that sought to improve stakeholder coordination to advance prevention objectives; and USD 3.3 million to projects that focused on the establishment or reform of anti-trafficking laws or frameworks. Projects that exclusively targeted the drivers of trafficking represented only a small percentage of funded activities. Those that focused on the social conditions that increase the risks of trafficking were awarded USD 16 million, or 1.3% of total funding. Only one project across the five fiscal years, which was awarded USD 500,000, concentrated on altering the practices of private sector actors, including labour recruiters and companies, that benefit from the exploitation of precarity.

Across all funded projects, 137 (8.7%) included at least one component directly intended to reduce the social inequities that raise the risk of trafficking or target the policies and conditions that enable the exploitation of precarity. These projects were collectively allocated USD 231 million or 18.7% of total funding and most often had among their objectives the expansion of educational access, vocational and entrepreneurial skills-building opportunities, and employment for at-risk populations. Their aim was usually to strengthen individual, family, and community resilience against poverty and the destabilising effects of crises to lessen the potential exploitation of youth who are homeless, orphaned, or in the foster care or juvenile justice systems, the familial resort to child labour for economic purposes, and insecure income-motivated migration among youth and adults. However, even while these projects may recognise the risks specific populations face of being trafficked—for example, because of race, ethnicity, gender, gender identity, sexual orientation, and migrant status—implemented

Department of Justice, Attorney General's Annual Report to Congress and Assessment of the US Government Activities to Combat Trafficking in Persons Fiscal Year 2019, Washington, D.C., 2019, p. 156, https://www.justice.gov/d9/pages/attachments/2022/03/24/fy19_ag_ht_report.pdf; L Anderson, 'UGA Receives \$15.75 Million to Combat Human Trafficking', University of Georgia College of Public Health, 20 November 2019, https://publichealth.uga.edu/uga-receives-15-75-million-to-combat-human-trafficking; US Department of Justice, Attorney General's Annual Report to Congress and Assessment of the US Government Activities to Combat Trafficking in Persons Fiscal Year 2020, Washington, D.C., 2020, p. 189, https://www.justice.gov/d9/pages/attachments/2022/03/24/fy20_ag_ht_report.pdf.

For example, in FY 2019, the Department of Transportation allocated USD 5.4 million for trafficking-related awareness campaigns on buses and trains and in transit hubs, and in FY 2020, the National Centre for Missing & Exploited Children received a USD 6 million grant to create presentations aimed at educating children and parents on the problem of child sex trafficking (US Department of Justice, 2019, pp. 187–188; US Department of Justice, 2020, p. 116).

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activities tended to focus on the identification and support of these populations rather than the transformation of the structural inequalities and associated discrimination that put them at risk.

Less supported was the direct targeting of the enablers and beneficiaries of trafficking. For example, it is well established in the literature on human trafficking that the high demand for migrant workers in destination countries is in direct conflict with restrictive migration laws and policies in these same countries; scholars argue this dilemma forces many potential migrant workers to resort to illegal and dangerous modes of entry, including securing the services of smugglers, which substantially heightens their risk of being trafficked or otherwise harmed.²³ Nonetheless, only 11 of the 1,582 projects (0.6%) included activities that centred on the establishment or reform of migration-related laws and policies to uphold the human rights of migrant workers. All of these projects focused on laws and policies in Africa, Asia, or Eastern Europe, which leaves the impression that it is only countries outside of the Global North and the West that require the establishment of more humane, rights-respecting migration systems.

It is also well established in the trafficking literature that trafficking is fuelled by the reliance of companies on sub-contracting and the lack of transparency of supply chains, exploitative labour recruitment practices that trap workers in debt bondage, weak oversight of labour markets at the domestic and international levels, and non-enforcement by states of laws against exploitative labour practices.²⁴ Even so, only 39 projects (2.5%) across the five fiscal years, collectively comprising 10% of total funds (USD 127 million), included a component focusing on labour recruiters, global supply chains, or private sector employers that profit from labour exploitation.

The dramatic expansion of US anti-trafficking funding domestically and globally may be interpreted as confirmation of the government's recognition of human trafficking as a pernicious social problem that must be eliminated. However, systematically reviewing the project activities it funded during FY 2017–2021 reveals that far more government resources have been allocated to coping with

Anderson; J M Chacón, "Tensions and Trade-Offs: Protecting Trafficking Victims in the Era of Immigration Enforcement', University of Pennsylvania Law Review, vol. 158, no. 6, pp. 1609–1653; A T Gallagher, 'Exploitation in Migration: Unacceptable But Inevitable', Journal of International Affairs, vol. 68, no. 2, 2015, pp. 55–74; C van den Anker and I van Liempt (eds.), Human Rights and Migration: Trafficking for Forced Labour, Palgrave Macmillan, New York, 2012.

²⁴ B Andrees and P Belser, 'Strengthening Labour Market Governance Against Forced Labour', in B Andrees and P Belser (eds.), Forced Labour: Coercion and Exploitation in the Private Economy, Lynne Rienner, London, 2009, pp. 109–127; G LeBaron, Combatting Modern Slavery: Why Labour Governance is Failing and What We Can Do About It, Polity, Cambridge, 2020.

the consequences of human trafficking than to the social, economic, and political drivers of trafficking, undercutting the government's expressed commitment to its eradication.

The Rhetoric of Prevention

My administration is 100 percent committed to eradicating human trafficking from the Earth.²⁵

During National Human Trafficking Prevention Month, we reaffirm our commitment to protect and empower survivors of all forms of human trafficking, to prosecute traffickers, and to bring an end to human trafficking in the United States and around the world.²⁶

A human rights-informed approach to human trafficking requires a multi-pronged strategy inclusive of efforts to ensure the short- and long-term holistic wellbeing of survivors and the achievement of accountability and justice for harms suffered. Conducting prevalence studies, increasing public awareness of the signs of trafficking, establishing or strengthening anti-trafficking legal frameworks, and improving knowledge among, and collaboration between, key stakeholders may gradually help to change the environment within which trafficking becomes possible. Nonetheless, all of these activities in themselves do not alter the structural conditions that increase the risks to particular populations of being trafficked, including social hierarchies of race, ethnicity, gender, gender identity, sexual orientation, class, migrant and refugee status, and nationality, among others, which limit life and livelihood opportunities.²⁷ Nor do these efforts directly disrupt the institutions and practices that support the exploitation of precarity, including anti-migrant laws that coexist with high demand for migrant labour, fuelling a resort of migrant workers to illicit and dangerous modes of entry, lack of transparency in supply chains, and the refusal of governments to hold private sector actors accountable for even the most egregious labour violations.²⁸

²⁵ 'President Donald Trump at the White House Summit on Human Trafficking', 31 January 2020, https://www.c-span.org/video/?468828-1/president-trump-white-house-summit-human-trafficking.

^{26 &#}x27;A Proclamation on National Human Trafficking Prevention Month, 2022', The White House, 30 December 2021, https://www.whitehouse.gov/briefing-room/presidential-actions/2021/12/30/a-proclamation-on-national-human-trafficking-prevention-month-2022.

²⁷ Cameron and Newman; Lewis and Waite; T Bastia, 'Stolen Lives or Lack of Rights? Gender, Migration and Trafficking', *Labour, Capital and Society*, vol. 39, no. 2, 2006, pp. 20–47.

²⁸ Anderson; LeBaron, 2020, pp. 38–61.

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In the absence of appropriate funding for activities targeting causal factors, the onus is put on those who are already most disadvantaged to prevent their own exploitation. A favoured approach in the anti-trafficking arena—the implementation of public awareness campaigns—is illustrative. There are a wide range of activities supported by the US government designed to increase public awareness of the signs of trafficking and how to report possible cases, including efforts to 'hook' viewers and listeners through edutainment—e.g. dramatic public service announcements, television series and films, comics, catchy radio jingles, and so forth. There is a growing body of literature critical of anti-trafficking awareness campaigns aimed at a general audience, including scholarship documenting the stereotypical images of trafficking, trafficked persons, and traffickers that are often perpetuated through these campaigns and the failure of these campaigns to address the forces driving trafficking.²⁹ Also warranting more scrutiny are awareness programmes targeted at populations facing a high risk of trafficking, particularly pre-departure education of potential migrant workers, which have become increasingly common over the past decade.

Pre-departure training programmes, such as those implemented by Winrock International as part of its US-funded 'Safe Migration in Central Asia Project',³⁰ usually cover a wide range of information that goes beyond warning migrant workers of dangers they may face during transit and at their destination, including unethical labour recruiters and employers.³¹ Nevertheless, a key assumption behind these programmes is that knowledge is power—that is, arming potential migrants with information about the kinds of challenges and hazards they may face and

See, for example, the *Anti-Trafficking Review* special issue on 'Public Perceptions and Responses to Human Trafficking', issue 13, 2019, https://www.antitraffickingreview.org/index.php/atrjournal/issue/view/21. See also E O'Brien, 'Human Trafficking Heroes and Villains: Representing the Problem in Anti-Trafficking Awareness Campaigns', *Social & Legal Studies*, vol. 25, no. 2, 2016, pp. 205–224, https://doi.org/10.1177/0964663915593410; N Szablewska and K Kubacki, 'Anti-Human Trafficking Campaigns: A Systematic Literature Review', *Social Marketing Quarterly*, vol. 24, no. 2, 2018, 104–122, https://doi.org/10.1177/1524500418771611; J Mendel and K Sharapov, "'Stick Them to the Cross': Anti-Trafficking Apps and the Production of Ignorance', *Journal of Human Trafficking*, vol. 8, no. 3, 2022, pp. 233–249, https://doi.org/10.1080/23322705.2020.1801284.

Winrock International, USAID Safe Migration in Central Asia (SMICA) Activity Annual Highlights – Period Covered: October 1, 2020 – September 30, 2021, 2021, https://winrock.org/wp-content/uploads/2022/04/SMICA-ANNUAL-HIGHLIGHTS-YEAR-2_public.pdf. Winrock International received USD 10 million for the SMICA project in FY 2020 and 2021.

See, for example, ILO Regional Office for Asia and the Pacific, *Pre-Departure Training Curriculum, Viet Nam to Malaysia: Facilitator's Manual*, ILO, Bangkok, 2014, https://www.ilo.org/wcmsp5/groups/public/---asia/---ro-bangkok/---sro-bangkok/documents/publication/wcms_314221.pdf.

the rights they possess will enable them to make smarter decisions, leading to a safer migration experience.³² The limited evaluations that have been conducted of these programmes offer little evidence that they are achieving this objective.³³ Pre-departure education does not alter the social hierarchies or conditions driving people to migrate despite the risks, nor does learning their rights mean migrants will be able to enforce them. And, in the absence of interventions targeting the enablers and beneficiaries of exploitation, these programmes are rooted in neoliberal expectations of self-help.³⁴ Elsewhere, I have compared anti-trafficking educational programmes targeting at-risk populations to anti-rape efforts that focus on what women should do to avoid sexual harm, including altering the way they dress, being careful about what and how much they drink, sticking close to their friends, and taking self-defence classes. Such an approach may keep individual women safe, but it does nothing to address the root causes of sexual violence. Similarly, absent attention to the underlying causes of labour exploitation, relying on pre-departure programmes to ensure a safe migration experience puts the responsibility 'on migrant workers themselves to prevent their own exploitation, while the institutions designed to benefit from the exploitation of precarity are largely left unchanged.' Consequently, even in a best-case scenario where knowledge gained empowers an individual training participant to avoid mistreatment by recruiters or employers, the 'effect is to merely shift the harm on to others rather than to prevent it'.35

N S Pocock *et al.*, 'Challenges to Pre-Migration Interventions to Prevent Human Trafficking: Results from a Before-and-After Learning Assessment of Training for Prospective Female Migrants in Odisha, India', *PLOS ONE*, vol. 15, no. 1, p. 1, https://doi.org/10.1371/journal.pone.0238778; K Sharapov, S Hoff, and B Gerasimov, 'Editorial: Knowledge Is Power, Ignorance Is Bliss: Public Perceptions and Responses to Human Trafficking', *Anti-Trafficking Review*, issue 13, 2019, pp. 1–11, https://doi.org/10.14197/atr.201219131.

Pocock et al., p. 3; P Aryal and A Kharel, Does Pre-departure Orientation Protect Labour Migrants? Examining Pre-departure Interventions in Nepal, AGRUMIG Policy Brief Series, no. 10, January 2023, https://agrumig.iwmi.org/wp-content/uploads/sites/41/2023/01/AGRUMIG-Policy-Brief-Series-No-10.pdf; M M B Asis and D R Agunias, Strengthening Pre-Departure Orientation Programmes in Indonesia, Nepal and the Philippines, International Organization for Migration Issue Brief, issue 5, September 2012, https://www.migrationpolicy.org/pubs/PredepartureOrientation.pdf; R Rosenberg, S Lazaroiu and E Tyuryukanova, Best Practices for Programming to Prevent Trafficking in Human Beings in Europe and Eurasia, Office of Women in Development, Bureau for Economic Growth, Agriculture, and Trade, USAID, September 2004, https://pdf.usaid.gov/pdf_docs/PNADP650.pdf.

³⁴ I Lorey, State of Insecurity: Government of the Precarious, Translated by A Derieg, New York, Verso, 2015, p. 35.

Hebert, p. 209. See also Pocock et al.

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In addition to the dominance of 'preventive' strategies that do little to disrupt the ability of private actors to exploit precarity with impunity, US funding patterns reinforce the notion that the causes of trafficking lie in the Global South. The US allocates substantial resources to domestic activities relating to the identification of traffickers and trafficked persons, support services for survivors, border control, and improvements in civil and criminal remedies. But nearly all funded activities that target the structures and conditions exacerbating precarity or the enablers and beneficiaries of exploitation are focused on actors and communities in Asia, Africa, and Latin America.

The top four recipients of US anti-trafficking funding between FY 2017-2021, by a substantial margin, were the International Organization for Migration (IOM, USD 70 million), Winrock International (USD 69.4 million), the International Labour Organization (ILO, USD 67 million), and the Global Fund to End Modern Slavery (GFEMS, USD 51 million). These are also the organisations responsible for implementing many of the projects that sought to address the effects of social inequalities or the enablers of trafficking. Winrock International was one of the few award recipients to focus attention on both. For example, Winrock received USD 10 million between FY 2017 and 2021 to support the US Agency for International Development (USAID) Counter Trafficking in Persons Project in Thailand that, among others, aimed to amplify 'migrant voices', increase Thai 'empathy toward migrants', promote 'the regularization of migrant workers from Cambodia and Myanmar to reduce their vulnerability to TIP', and improve business practices. 36 All of Winrock International's anti-trafficking activities were focused on the Global South, with a heavy emphasis on Asia. IOM's efforts to support dialogue on migration management and counter xenophobia against migrants were focused on countries in Latin America, Eastern Europe, Asia, and Africa, as were its activities relating to ethical labour recruitment. The only IOM projects specifically focused on the Global North centred on survivor reunification with family members in their host country or their return and reintegration into their home countries. During the study period for the Bridge to Global Action on Forced Labour, the ILO received USD 18.7 million to, in part, implement livelihood programmes to reduce the potential for trafficking among high-risk populations and improve the efforts of workers' and employers' organisations in combatting forced labour. In 2017, it also received USD 7.5 million for programmes aimed at preventing child recruitment in labour supply chains and expanding partnerships between businesses and workers' organisations. Although both of these ILO projects involved the building of global partnerships, the activities relating to precarity and the enablers of the exploitation of precarity were focused on Africa, Asia, Latin America, and Eastern Europe.

USAID, 'USAID Thailand Counter Trafficking in Persons', n.d., https://www.usaid.gov/asia-regional/fact-sheets/usaid-thailand-counter-trafficking-persons.

The ILO, IOM, and Winrock International all have a long history in the antitrafficking arena. GFEMS was only established in 2016, with USD 51 million from the US government. At the time, the DoS praised GFEMS for developing a 'new' and 'transformational' approach,³⁷ with a mission to 'make "modern slavery" unprofitable by targeting the supply of people vulnerable to exploitation, the demand for cheap labour by the private sector, and weak justice systems and poor governance that create enabling environments for slavery.'38 It is not possible to determine from GFEMS' available financial statements or impact reports how much of the funding it received was allocated to particular activities, which, according to GFEMS, included training directed to the private sector, recruitment agencies, and criminal justice systems and entrepreneurial support for at-risk populations.³⁹ But all of its projects were targeted toward sectors in Asia, East Africa, and Brazil. GFEMS has since shifted its mission, which is now to 'build a survivor-centric global anti-trafficking movement ... by supporting advocacy and providing flexible funding for survivor-leaders, activists, and grassroots organizations around the world'. 40 It is therefore not clear whether GFEMS is abandoning its private sector-focused activities. However, the geographical focus of all of its activities relating to the structures and institutions that allow for the exploitation of precarity during the period under review, along with that of the IOM, ILO, and Winrock International, reinforces the discourse of antitrafficking 'champions' versus 'laggards', with this division largely falling along Global North/South lines.

The intent here is not to minimise the importance of the US providing anti-trafficking funding to countries and organisations in the Global South. Rather, it is to draw attention to how the government's domestic anti-trafficking priorities stand in contrast to its priorities outside of US borders, particularly in the Global South, which has the effect of constructing the problem of trafficking and its origins in a way that invisibilises its own contributions to precaritisation and the enabling of the exploitation of precarity. In surveilling the anti-trafficking record of every other country in the world, backed up with the threat of penalty for

US Department of Justice, Attorney General's Annual Report to Congress and Assessment of the US Government Activities to Combat Trafficking in Persons – Fiscal Year 2017, Washington, D.C., 2017, p. 21, https://www.justice.gov/d9/pages/attachments/2018/10/22/ agtipreportfy2017.pdf.

³⁸ Hebert, p. 211.

End Modern Slavery Initiative Foundation (dba Global Fund to End Modern Slavery), Financial Statements Years Ended December 31, 2021 and 2020, BDO LLC, https://www.gfems.org/wp-content/uploads/2022/10/GFEMS-Annual-Financial-Statement-2021-Final.pdf; Global Fund to End Modern Slavery, *Impact Report 2021*, https://www.gfems.org/wp-content/uploads/2022/11/2021-Impact-Report-opt-1.pdf.

Global Fund to End Modern Slavery, 'About Us', retrieved 4 December 2023, https://gfems.org/about-us.

those that fail to meet its own established standards, the US has positioned itself at the apex of the 'champions' list. This is further reinforced by the millions of dollars the government spends on international expert exchanges to train government peers, police departments, judicial authorities, and service providers from countries around the world on US anti-trafficking laws and policies.⁴¹ US anti-trafficking funding may fill an important gap globally, including through allowing perennially resource-starved non-profits to provide critical short- and long-term support to trafficking survivors. The broader effects of the US' funding decisions, however, are not benign. Scholars have long critiqued the US' leadership in the anti-trafficking arena, particularly its policy of exporting an anti-prostitution and criminal justice-oriented approach to trafficking, with detrimental human rights consequences.⁴² But the US' funding of efforts to support international dialogue on migration and reform of related laws and policies to uphold the human rights of migrants only in Global South or Eastern European contexts, along with its Global South-oriented efforts to engage private actors profiting from exploitation, serves to conceal how the histories, laws, and policies of the purported anti-trafficking champions in the Global North are implicated in the very precaritisation that renders some populations more at risk of being trafficked than others. Moreover, it conceals how 'legitimate actors', including governments, corporations, and consumers in the Global North, have also been beneficiaries of exploitative labour practices.⁴³

Conclusion

The US is far from alone in identifying human trafficking as a pressing global problem, or in channelling millions of dollars each year to activities intended to improve efforts to prevent trafficking, protect survivors, or punish those profiting from trafficking. It is, however, the largest and most influential funder of anti-trafficking activities globally, with the ability to shape related laws, policies, and practices of governments around the world. Tracking how the US spends its anti-trafficking funds therefore matters.

The research conducted for this article is ongoing, with databases being created for all AG reports released since fiscal year 2003, when the DoJ first began submitting them to Congress. This comprehensive approach will allow for analysis of how

In the five-year period of the study, the US spent more than USD 21 million on transferring its practices to other countries through international expert trainings.

Ahmed and Seshu; Kinney; Weitzer; Y C Zimmerman, Other Dreams of Freedom: Religion, Sex, and Human Trafficking, Oxford University Press, Oxford, 2013.

See, for example, Hebert, pp. 167–201, for an analysis of forced migrant labour on US military bases in Iraq and Afghanistan.

anti-trafficking activities and the US federal government's funding priorities have evolved over time and across four presidential administrations. My review of the AG's reports for fiscal years 2017–2021, however, offers documentation of the government's most current anti-trafficking funding priorities—and how these priorities correspond to the accumulation of knowledge over the past two decades regarding the main forces driving human trafficking. Less than 1.3% of total funding during this period was exclusively aimed at addressing the hierarchies that render certain populations at greater risk of being trafficked, while a negligible amount was devoted to addressing the practices of beneficiaries of exploitation. Widening the scope of analysis, I found that less than 19% of total funds awarded included at least one component that aimed to address the inequities that heighten the risk of trafficking or the conditions, policies, and practices that allow for the continued exploitation of precarity (a low threshold for consideration). Among these funded projects, the emphasis of the preventive component(s) was most often on enhancing individual, family, and community resilience, albeit in a way that avoided attention to the structures fuelling precarity. Moreover, only 3% of projects, collectively awarded 10% of total funding, included at least one component focused on private sector-related enablers and beneficiaries of trafficking, with all of these projects directed outward to governments, organisations, and private sector actors in the Global South.

Whether eliminating all incidences of human trafficking everywhere is a realisable objective is a separate question.⁴⁴ What is not in doubt, however, is that no matter how much funding is allocated to combating human trafficking, making progress globally toward this objective will never be possible as long as governments around the world, including the US government, continue to avoid the hard work of targeting the already well-established drivers of human trafficking and confronting how their own laws, policies, and actions both perpetuate precarity and enable exploitation.

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⁴⁴ See Gallagher for a sceptical opinion.

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Compounding Institutional Exclusion and Harm: A case study of federally funded Alaskan anti-trafficking service providers

Tatiana Rothchild, Ajela Banks, and Tara Burns

Abstract

Federal funds for human trafficking victim programmes and services in the United States have increased from approximately USD 10 million in 2002 to more than USD 90 million in 2022. This increase in fund availability, however, has not necessarily translated into meaningful or accessible services for trafficking survivors. This paper examines the distribution of Department of Justice antitrafficking funds through the Office for Victims of Crime (OVC), particularly looking at OVC recipients in Alaska. It highlights certain trends in OVC funding in the state, including changes in funding distribution, the emphasis on task force creation and collaboration between service providers and law enforcement, and discussions of equity and inclusion. The paper further explores institutional mechanisms of exclusion and harm of some victims, complexities in collaborating with law enforcement, criminalisation of trafficking survivors, and criteria to qualify for services. As the reality faced by trafficking survivors does not always align with OVC narratives, these mechanisms are illustrated through the experiences of a sex trafficking survivor who has been turned away as not qualifying for services by many of the OVC funded providers in Alaska. The paper concludes by exploring the implications of this research for policymakers and service providers.

Keywords: sex trafficking, federal funding, institutional harm, Alaska

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Introduction

Ajela Banks was first trafficked at sixteen while in custody of the State of Alaska. In 2018, at age eighteen, despite repeatedly asking law enforcement for help, she was shot three times by her trafficker and left for dead. Now, the person who trafficked her calls her from jail, threatening her life if she does not revoke her testimony in his trafficking case. His associates come to her apartment and threaten her. Her sister has been missing since September 2023 and Ms Banks has received texts that her trafficker had her sister raped and murdered. These threats also say that she will be next if she does not do what the trafficker tells her. Despite over USD 10 million in anti-trafficking funding flowing into Alaska between 2019 and 2024, Ms Banks has not been able to receive meaningful assistance from any local agency in her efforts to save her own life.

What are the mechanisms that keep trafficking victims like Ms Banks from receiving services supposedly made for them? What institutional accountability explains how the USD 12 million in federal victim services funds have been spent in Alaska over the last ten years? What do a plethora of victim service funds mean if survivors cannot access them? This paper explores these questions by looking at Alaska's victim services and considers Ms Banks' experiences to illustrate contradictions in anti-trafficking funding policies and the lived experiences of one supposed beneficiary of these state-funded interventions. It is part of an ongoing and overarching research project evaluating the distribution of anti-trafficking funds by the federal Office of Victims of Crime (OVC) and the projects that result from their grants. Ms Banks' experiences highlight the mechanisms of criminalisation and corruption that foster institutional exclusion and compound harm. Federal funding and nonprofit impact reports create narratives of inclusive victim services, but the criminalisation of victims, exclusionary institutional processes, and federal funding requirements end up empowering institutions more than survivors.

In the remainder of the paper we review the critiques of US anti-trafficking approaches, give a descriptive overview of the use of the OVC funds nationally, and then focus on a case study of Alaska's OVC funding distribution and recipients. To exemplify the institutional exclusion and harm discussed in the paper, we outline Ajela Banks' experiences as a trafficking survivor in Alaska and her interactions with these federally funded victim service organisations as an "everyday world" analysis of policy implementation for uncovering hidden dimensions of state regulations as they are manifest in the daily experiences of women whose lives are organized in relationship to the specific features of... policy. We conclude with suggestions for policymakers and service providers

N A Naples, 'Bringing Everyday Life to Policy Analysis: The Case of White Rural Women Negotiating College and Welfare', *Journal of Poverty*, vol. 2, issue 1, 1998, pp. 23–53, p. 24, https://doi.org/10.1300/J134v02n01_02.

in light of the institutional mechanisms illustrated here.

The United States Approach to Human Trafficking

The Trafficking Victims Protection Act of 2000 (TVPA) inscribed 'human trafficking' as a crime in US law and outlined anti-trafficking approaches that remain contested. Human trafficking is 'the exploitation of a person for the purpose of compelled labor or commercial sex through the use of force, fraud, or coercion', as described by the TVPA. This legal definition centres around the use of 'force, fraud, or coercion' to exploit a person through forced work or commercial sex and distinguishes between labour trafficking and sex trafficking. US federal law stipulates that any minor engaged in commercial sex is automatically categorised as a trafficking victim, whether or not there is any presence of force, fraud, or coercion by another person. Commercial sex is defined broadly as a sex act on account of which anything of value is given or received. This paper refers to broader definitions of sex trafficking (in which there is no one to charge with the crime of trafficking) as non-criminal definitions and specifies criminal definitions as those that include the criminal elements and presence of force, fraud, coercion, or minors as included in the US federal criminal definition.

Anti-trafficking policy and approaches have varied, as the concept of 'human trafficking' was formalised into national and international laws. In general, the criminal approach focuses on the prosecution of traffickers, while the human rights approach centres on providing services for victim recovery and trafficking prevention.⁵ Neo-abolitionism focuses on eradicating the sex industry by 'rescuing' women who sell sex and prosecuting traffickers and clients. Despite ongoing critiques, this approach remains favoured by the US today.⁶

² For more critical review of these approaches see, for example, R Andrijasevic and N Mai, 'Editorial: Trafficking (in) Representations: Understanding the Recurrent Appeal of Victimhood and Slavery in Neoliberal Times', *Anti-Trafficking Review*, issue 7, 2016, pp. 1–10, https://doi.org/10.14197/atr.20121771 or J Dahlstrom, 'Elastic Meaning(s) of Human Trafficking', *California Law Review*, vol. 108, issue 2, 2020, pp. 379–437, https://doi.org/10.15779/Z38T727G6S.

Department of Health and Human Services, 'What Do We Mean by Human Trafficking?', retrieved 10 December 2023, https://nhttac.acf.hhs.gov/soar/eguide/stop/what-is-trafficking.

⁴ United States Congress, *Trafficking Victims Protection Act of 2000*, Pub. L. 106–386, 114 Stat. 1464, codified as amended at 22 U.S.C 7101 § 1470.

S Demeke, 'A human rights-based approach for effective criminal justice response to human trafficking', *Int J Humanitarian Action*, issue 9, 2024, https://doi.org/10.1186/s41018-023-00143-4.

J A Chuang, 'Exploitation Creep and the Unmaking of Human Trafficking Law', *The American Journal of International Law*, vol. 108, issue 4, 2014, pp. 609–649, https://doi.

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The contemporary neo-abolitionist approach has been criticised by scholars, activists, workers, and survivors as emphasising collaboration with and expansion of law enforcement in dangerous and counterproductive ways. Expansion of police forces in the name of anti-exploitation movements increases state surveillance of marginalised communities, augmenting interactions between law enforcement and groups most likely to face violence and discrimination at the hands of police. The US has faced criticism for an ongoing problem of arresting trafficking victims rather than identifying them and equipping them with resources to remove themselves from exploitative situations. Marginalised workers who are more likely to have negative or violent interactions with police, including migrant workers and sex workers, may have valuable information about trafficking realities in their industries. Rather than increasing victim identification, negative interactions with law enforcement discourage workers, survivors, and trafficking first responders like clients from coming forward with information on trafficking.

The state's construction of 'ideal victims' has also been criticised by scholars as contributing to victim exclusion and mistreatment by law enforcement and other institutional actors. ¹⁰ This body of work suggests that victims are often expected

org/10.5305/amerjintelaw.108.4.0609; V Charnysh, P Lloyd, and B A Simmons, 'Frames and Consensus Formation in International Relations: The Case of Trafficking in Persons', *European Journal of International Relations*, vol. 21, issue 2, 2015, pp. 323–351, https://doi.org/10.1177/1354066114530173.

- M Ditmore, *The use of raids to fight trafficking in persons*, Sex Workers Project, 2009; S Dewey and T St. Germain, "'It depends on the cop": Street-based sex workers' perspectives on police patrol officers', *Sexuality Research and Social Policy*, vol. 11, 2014, pp. 256–270, https://doi.org/10.1007/s13178-014-0163-8; V Odinokova *et al.*, 'Police sexual coercion and its association with risky sex work and substance use behaviors among female sex workers in St. Petersburg and Orenburg, Russia', *International Journal of Drug Policy*, vol. 25, issue 1, 2014, pp. 96–104, https://doi.org/10.1016/j.drugpo. 2013.06.008.
- K Mogulescu and L Goodmark, 'Surveillance and Entanglement: How mandatory sex offender registration impacts criminalised survivors of human trafficking', *Anti-Trafficking Review*, issue 14, 2020, pp. 125–130, https://doi.org/10.14197/atr.20122 01410.
- A Lutnick, Domestic Minor Sex Trafficking: Beyond Victims and Villains, Columbia University Press, New York, 2016; J Musto, 'Domestic Minor Sex Trafficking and the Detention-To-Protection Pipeline', Dialectical Anthropology, vol. 37, issue 2, 2013, pp. 257–276, https://doi.org/10.1007/s10624-013-9295-0; C A Torres and N Paz, Bad Encounter Line: How Youth in the Sex Trade and Street Economy Are Turned Away From Systems Meant to Help Us & What We Are Doing to Fight Back, Young Women's Empowerment Project, 2012.
- A Forringer-Beal, 'Why the "Ideal Victim" Persists: Queering representations of victimhood in human trafficking discourse', *Anti-Trafficking Review*, issue 19, 2022, pp. 87–102, https://doi.org/10.14197/atr.201222196.

to be 'blameless' or 'passive', and victims who are young and female are more likely to be identified as such. ¹¹ White women are disproportionately represented in media narratives of sex trafficking victims. ¹² Victims who appear to be under the total control of a trafficker are more often viewed as 'worthy' of assistance, while others are seen as less deserving. ¹³ Perceptions of gender, race, nationality, and autonomy thus impact who is included in assistance programmes and who is perceived as a 'real victim'.

Methodology

This project began with an exploratory review of the OVC's distribution of federal anti-trafficking funds. We evaluated the DOJ's publicly available list of OVC-Funded Human Trafficking Services Grantees and Task Forces, particularly around geographic and demographic distribution, major recipients, and funding over time. Between 2004 and 2023, the OVC opened 123 grant solicitations for anti-human trafficking funds and awarded 1,069 grants. We evaluated both the grant solicitations and awarded grants. The grant solicitations and list of grantees are publicly available, though not compiled before this project (as far as we could identify) around geographic, demographic, or topical distributions.

We categorised the 123 grant solicitations into categories of funding distribution, amended from the OVC's fourteen organisational categories of anti-trafficking

M Wilson and E O'Brien, 'Constructing the ideal victim in the United States of America's annual trafficking in persons reports', *Crime, Law and Social Change*, vol. 65, 2016, pp. 29–45, https://doi.org/10.1007/s10611-015-9600-8; E Long and E B Dowdell, 'Nurses' Perceptions of Victims of Human Trafficking in an Urban Emergency Department: A Qualitative Study', *Journal of Emergency Nursing*, vol. 44, issue 4, 2017, pp. 375–383, https://doi.org/10.1016/j.jen.2017.11.004; S Majic, 'Beyond "Victim-Criminals": Sex Workers, Nonprofit Organizations, and Gender Ideologies', *Gender & Society*, vol. 28, issue 3, 2014, pp. 463–485, https://doi.org/10.1177/0891243214524623.

L M Agustín, 'Migrants in the Mistress's House: Other Voices in the "Trafficking" Debate', Social Politics: International Studies in Gender, State & Society, vol. 12, issue 1, 2005, pp. 96–117, https://doi.org/10.1093/sp/jxi003; R Austin, 'Human Trafficking in the Media: A Content Analysis on Human Trafficking Frames in Documentaries, Movies, and Television Episodes', Northeastern University Master's Thesis, 2016, https://repository.library.northeastern.edu/files/neu:cj82n4337.

J Srikantiah, 'Perfect Victims and Real Survivors: The Iconic Victim in Domestic Human Trafficking Law', Boston University Law Review, vol. 87, 2007, pp. 157–211.

Office for Victims of Crime, 'Matrix of OVC-Funded Human Trafficking Services Grantees and Task Forces', retrieved 10 December 2023, https://ovc.ojp.gov/matrix-ovc-funded-human-trafficking-services-grantees-and-task-forces.

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funding based on the grant solicitation list.¹⁵ The OVC's fourteen categories were either used directly or, when appropriate, compiled together into one category. Based on the grant solicitations, we inductively created additional categories of 'Law Enforcement Victim Specialists', 'Hotline Support', 'Discretionary Funds', and 'Fellowships', when these were noted in the solicitation title and primary goal. The final categories were applied by two coders, and each of the grant solicitations were categorised based on the stated primary goal and the victim community served (if specified).¹⁶

In evaluating the list of awarded grants, we compared the total number and amount of grants per state against population information and between states. We selected Alaska as a case for this paper based on the high level of funding offered compared to the low number of identified victims and the short list of organisational recipients for these funds, as well as on one of the authors' experience as an advocate and researcher in Alaska. Another of the authors, Ms Banks, has lived experience as a young Black sex trafficking survivor charged federally with conspiracy to commit sex trafficking.

The lenses of researcher, advocate, and survivor offer a unique and layered perspective on the institutional mechanisms at play in Alaska's case. These layered methods build on previous scholars' work which has created grounded theory examining the socio-political contexts of lived experience.¹⁷ These multiple

Office for Victims of Crime, 'Human Trafficking: Grants and Funding', https://ovc.ojp.gov/program/human-trafficking/grants-funding.

These final categories include General Services (which includes the OVC categories 'Comprehensive Services for Victims of All Forms of Human Trafficking Program', 'Field-Generated Innovations in Assistance to Victims of Human Trafficking Program', 'Improving Outcomes for Child and Youth Victims of Human Trafficking Program', and 'Services for Victims of Human Trafficking Program'), Specialised Services ('Field-Generated Strategies to Address the Criminalization of Minor Victims of Sex Trafficking', 'Integrated Services for Minor Victims of Human Trafficking', 'Project Beacon: Increasing Services for Urban American Indian and Alaska Native Victims of Sex Trafficking Program', and 'Services for Minor Victims of Labor Trafficking'), Training and Technical Assistance (based on the OVC description of 'Human Trafficking Training and Technical Assistance Program'), Legal Services ('Increasing Legal Access to Victims of Crime Program'), Prevention (based on 'Preventing Trafficking of Girls'), Task Force Support (based on 'Enhanced Collaborative Model to Combat Human Trafficking Program'), Housing ('Housing Assistance Grants for Victims of Human Trafficking'), Law Enforcement Victim Specialists, Hotline Support, Discretionary Funds, and Fellowships.

C Rambo Ronai, 'The Next Night Sous Rature: Wrestling With Derrida's Mimesis', Qualitative Inquiry, vol. 5, issue 1, 1999, pp. 114–129, https://doi.org/10.1177/ 107780049900500106; C Ellis and M Flaherty (eds.), Investigating Subjectivity: Research on Lived Experience, Sage Publications, Newbury Park, 1992.

lenses have contributed to this project's structure and methodology, in the choice to centre a survivor's experience (particularly, that of a survivor who has been excluded from many of these institutional structures) in storytelling to illustrate the mechanisms this research examines. The authors are currently pursuing additional case studies based on the exploratory research into OVC funds for future projects. The following section provides a descriptive overview of findings of the research on OVC funds and aims to contextualise the Alaska case study and Ajela Banks' story in a national picture.

Limitations

One survivor's story is a small sample, but Ms Banks' lived experience demonstrates the impact of the local and state institutional mechanisms that are already visible at the federal level. Her narrative here is not intended to indict any particular organisations, but to illustrate a survivor's experiences under funded programmes that are incentivised to prioritise institutional processes over survivor agency. The reality is not necessarily better when examining service providers outside of federally funded projects, and Ms Banks is not the only sex trafficking victim in Alaska sharing stories of corruption, exploitation, and exclusion by Alaskan law enforcement and victim service providers.¹⁸

The organisations mentioned in this paper are not a comprehensive list of all services that trafficking survivors may explore in Alaska and do not necessarily represent the institutional mechanisms or accountability structures in all states. However, by examining the difference in reality and survivor experiences compared to what is suggested 'on paper', this case highlights some institutional mechanisms and methodologies for evaluation that can be relevant to other states and organisations. This paper aims to centre the experiences of survivors not only in discussion but also as a methodological orientation about how scholars and funders evaluate the impact of anti-trafficking grants in different areas.

The OVC recipients we researched did not provide specific grant reports or additional financial information beyond what is publicly available, although we did reach out to each organisation asking specifically about the distribution of these funds. The findings in this project also do not represent a comprehensive survey of all service recipients or all applicants to these services, and it is not within the scope of this project to speak to what percentage of survivors of criminal or non-criminal sex trafficking are turned away from these services or for what reasons. Currently, federal agencies and scholars rely heavily on information

A Nickerson, 'Dicey Pricey - The Tale of Priceless – Where Does the Money Go in a Well Funded Church Organization?', *This Is How We Rise*, 28 February 2023, https://amberbattsblog.com/2023/02/28/diceypricey.

self-reported by organisations, a constraint in these accountability systems that this research does engage with.

Anti-Trafficking Funds: Findings from the Office for Victims of Crime (OVC) grants

Established in 1988, the OVC is charged by Congress with administering the Crime Victims Fund which funds programmes and services intended to assist victims in the immediate aftermath of crime and offer continued support. This includes 'victim compensation and assistance' and 'training, technical assistance, and other capacity-building programmes designed to enhance service providers' ability to support victims of crime'. Of the approximately USD 500 million that the OVC distributed in 2020, about USD 85 million went to anti-trafficking projects. With the 9,854 clients that the OVC estimated to have served through OVC-funded organisations in 2020, this comes to around USD 8,600 per survivor service recipient. The OVC acknowledges that the number of estimated clients is high and likely to include overlap in data reported by grantees that receive both *Victims of Crime Act* and OVC funding.

There is no standardised distribution of OVC anti-trafficking funds across the US. In addition to the 50 states and the District of Columbia, US territories (namely Guam, Puerto Rico, and the Northern Mariana Islands) receive OVC funds. Cumulatively, these territories receive more funds per capita than other areas of the United States. Delaware, Washington D.C., and Alaska are the only other areas to receive more than USD 1 per capita (\$1.45, \$1.37, and \$1.03, respectively). Though having a high percentage of white populations in the state does not correlate with receiving more funding, having a high percentage of Black populations does correlate with lower per capita funding. Washington D.C. (45% Black) was the only area with a high percentage of Black population to receive more than USD 1 per capita in funds. The other states with over 25% of their population described as Black were Mississippi (38%), Georgia (32%), Louisiana (32%), Maryland (30%), Alabama (27%), and South Carolina (27%) which received between \$0.06 and \$0.24 per capita.

Office for Victims of Crime, 'About', https://ovc.ojp.gov/about.

Office for Victims of Crime, On Ongoing Commitment to Victims of Human Trafficking, 2020, p. 3, https://ovc.ojp.gov/sites/g/files/xyckuh226/files/media/document/ovc-tims-report-508.pdf; Office for Victims of Crime, FY 2007 – FY 2024 Crime Victims Fund Annual Receipts and Cumulative Monthly Deposits (\$ Millions) (as of 10/1/2023), p. 2, https://ovc.ojp.gov/about/crime-victims-fund/fy-2007-2024-cvf-annual-receipts.pdf.

Office for Victims of Crime, 2020, p. 3.

The full list of OVC anti-trafficking fund awards includes over 1,000 grants distributed to hundreds of recipients since the OVC began distributing human trafficking programme grants in 2004. The national organisations which received the most OVC funds (when branches across the nation were combined) were the non-profit International Rescue Committee (approximately USD 32.6 million over 47 grants) and faith-based organisations The Salvation Army (approximately USD 21.1 million over 34 grants) and Catholic Charities (approximately USD 13 million over 21 grants). The highest single amount given was an USD 8 million grant given to Equal Justice Works based in Washington D.C. There have been seven other grants over USD 2 million and twenty-three grants between USD 1 and USD 2 million, but the majority (95%) of OVC grants are between USD 100,000 and USD 1 million.

The 123 solicitations for OVC grants were qualitatively coded into twelves categories (see Table 1 below). Some of these more focused categories (Prevention, Law Enforcement Victim Specialists, Task Force Support, and Hotline Support, specifically) are noticeably introduced in later years. The funding for task force creation and expansion highlights the federal norm of encouraging collaboration with law enforcement and the preference for using task forces as an anti-trafficking policy model.²²

Table 1 shows the change in the distribution of OVC funds over time, illustrating the introduction of new categories, the focus on funding task forces, and specialised services. While these figures only show the percentage of OVC funding distribution, Table 1 breaks down these categories over the two time periods, illustrating the overall increase in OVC funding and the special focus on general and specialised services and task force support. The following section breaks down the OVC grants that have been distributed in Alaska, looking more closely at the funded organisations that have offered services to survivors like Ms Banks.

Table 1: OVC Funding Distribution

(shows total amount of all funds per category)

Distribution of Funds	2005–2015	2016–2023	Increase
Discretionary	\$6,205,109	\$47,849,999	671%
Fellowships	\$447,056	\$960,272	115%
General Services	\$35,811,297	\$264,135,423	638%
Hotlines		\$15,999,966	
Housing		\$34,920,001	

²² *Ibid.*, p. 3.

Legal Services	\$5,290,398	\$16,967,740	221%
LE Victim Specialist		\$21,831,779	
Prevention		\$11,084,103	
Specialised Services	\$8,432,381	\$400,628,554	4651%
Task Force		\$126,267,175	
Technology		\$7,989,675	
Training and Technical			
Assistance	\$999,982	\$22,136,451	2114%
Other		\$7,998,328	

The solicitations for OVC grants follow a similar structure that allows applicant organisations to outline the nature and scope of the problem they aim to address, contextual information about their community, and specific objectives for their project. OVC grants rely on federally selected performance measures, self-reported by the grantee, to understand the impact and efficacy of the distributed funds.²³ These performance measures differ slightly between categories of OVC solicitation but are consistently centred around quantitative metrics (number of members in a task force, number of trainings, number of victims who received services, etc.).²⁴ Qualitative evaluation (for example, feedback from people with lived experience) are included but make up a minority of prompts.²⁵

Anti-Trafficking Funds: A closer look at Alaska

Six Alaskan organisations have received funds from the OVC: one corporation (the Alaska Housing Finance Corporation), one city government agency (the Municipality of Anchorage), and four nonprofits (Covenant House of Alaska, the Alaska Institute for Justice, the Alaska Native Justice Center, and the Alaska Native

Office for Victims of Crime, 'How Are Performance Measures Reported?', retrieved 4 March 2024, https://ovc.ojp.gov/funding/performance-measures/reporting-performance-measures#1-0.

Office for Victims of Crime, 'Human Trafficking Grantee Performance Measures', https://ovc.ojp.gov/funding/performance-measures/human-trafficking.

See, for example, the measures and questionnaire completed by grants received under the 'Enhanced Collaborative Task Force Grant Program' or the 'Human Trafficking Victim Service Provider'. Office for Victims of Crime, Enhanced Collaborative Model Task Force To Combat Human Trafficking Law Enforcement Performance Measures, https:// ovc.ojp.gov/funding/performance-measures/human-trafficking/enhancedcollaborative-model-law-enforcement-questionnaire.pdf; Office for Victims of Crime, Human Trafficking Victim Service Provider Performance Measures, https://ovc.ojp.gov/ funding/performance-measures/human-trafficking/human-trafficking-performancemeasures-questionnaire.pdf.

Women's Resource Center.) The Alaska Native Justice Center has received by far the most OVC funds, approximately USD 4.6 million between 2019 and 2022. The Alaska Institute for Justice received approximately USD 2.8 million in the ten years between 2012 and 2022, while Covenant House and the Alaska Housing Finance Corporation received USD 1.75 and USD 1.3 million, respectively. The City of Anchorage and the Alaska Native Women's Resource Center each received the smallest grants, between USD 750,000 and 800,000.

Table 2: OVC Recipients in Alaska

Recipient	Total Amount	Grant Year	Grant Amount	Title
Alaska Housing Finance Corporation	\$1,300,000	2022	\$800,000	Alaska Survivors Assistance for Escaping Trafficking (SAFE-T) Assistance Network
		2020	\$500,000	Alaska Housing Finance Corporation Housing Assistance Grants for Victims of Human Trafficking Response
Alaska Institute for Justice	\$2,849,928	2022	\$800,000	Promoting Racial Equity through Specialized Legal Services for Underserved Alaska Victims of Human Trafficking
		2019	\$650,000	Specialized Legal Services to Support Victims of Human Trafficking in Rural Alaska Communities
		2016	\$600,000	Specialized Legal Services and Language Access Services for Unserved and Limited English Proficient Labor Trafficking Victims in Anchorage, Alaska
		2013	\$400,000	Statewide Comprehensive Services for All Adult and Minor Victims of Human (Sex and Labor) Trafficking in Alaska
		2012	\$399,928	Alaska Victim Legal Assistance Network of Ten Partner Agencies to Develop Comprehensive, Collaborative Model for Delivering Wraparound Legal Assistance to Crime Victims
	\$4,578,987	2023	\$950,000	Dezhuni eł Survivor Services
		2021	\$750,000	Strengthening Services Through Action
Alaska Native Justice Center, Inc.		2020	\$2,428,987	ANJC 2020 Tribal Victim Services
		2019	\$450,000	Mat-Su Trafficking Victim Services (MSTVS)
Alaska Native Women's Resource Center	\$800,000	2019	\$800,000	Alaska Native Tribes' Victims of Crimes Specific TA, Training and Outreach
Anchorage Municipality	\$749,755	2021	\$749,755	Strengthening Services through Action; Anchorage Enhanced Collaborative Model Task Force to Combat Human Trafficking

Covenant House of Alaska \$1,75		2020	\$750,000	Covenant House Alaska Services for Victims of Human Trafficking: Enhancing Scope of Service
	\$1,750,000	2020	18500 000	Covenant House Alaska's Housing Assistance Grant for Victims of Human Trafficking
		2019	\$500,000	Anchorage Minor Victims of Human Trafficking Service Coordination Project

Only Covenant House, the Alaska Institute for Justice, and the Alaska Native Justice Center primarily act as direct victim service providers, although the Alaska Housing Finance Corporation received two grants specifically to provide housing support for trafficking victims. Beginning in 2021, the Alaska Housing Finance Corporation's financial records show USD 36,000 (2021), USD 236,000 (2022), and USD 243,000 (2023) as grants labelled for the category 'Victims of Human Trafficking', accounting for USD 515,000 of the USD 1.3 million they have received from the OVC in 2020 and 2022. Ms Banks has asked for services from each of these organisations, particularly pursuing assistance with long-term housing, legal services, and safety. This is discussed later in the paper.

The respective organisations' size and their expenses can impact what receiving large grants means for them. For Covenant House Alaska, the largest OVC grant was a 2020 USD 1.25 million grant. This marks about 10% of their total revenue that year (USD 12.8 million).²⁷ The Alaska Institute for Justice's largest award was an USD 800,000 grant in 2022, which was 47% of their revenue that year.²⁸ The Alaska Native Justice Center's highest award was a USD 2.4 million grant in 2020, or 69% of their total revenue that year (approximately USD 3.5 million).²⁹ The Alaska Native Women's Resource Center received one OVC grant of USD 800,000 in 2019 that marked 56% of their total revenue that year.³⁰

Alaska Housing Finance Corporation, *Financial Statements*, 2021, p. 41, https://www.ahfc.us/application/files/1716/3476/3336/210630-AHFC-Audited-Financials.pdf; Alaska Housing Finance Corporation, *Financial Statements*, 2022, p. 47, https://www.ahfc.us/application/files/1716/6458/5556/2022-06-30-fin-stmts-ahfc-audited.pdf; Alaska Housing Finance Corporation, *Financial Statements*, 2023, p. 43, https://www.ahfc.us/application/files/8816/9696/1107/2023-06-30-fin-stmts-ahfc-audited.pdf.

ProPublica, 'Covenant House Alaska', https://projects.propublica.org/nonprofits/ organizations/133419755.

ProPublica, 'Alaska Institute for Justice', https://projects.propublica.org/nonprofits/ organizations/562533062.

ProPublica, 'Alaska Native Justice Center Inc.', https://projects.propublica.org/ nonprofits/organizations/920145727.

ProPublica, 'Alaska Native Women's Resource Center', https://projects.propublica.org/nonprofits/organizations/474099129.

Alaska has received more OVC funds for human trafficking per capita than most OVC recipient geographic areas, but this is not a result of nor has it led to an increase in identified trafficking victims in the state. Since 2019, the Alaska Department of Public Safety reported 6 cases of sex trafficking (one in 2020, one in 2021, and four in 2023) and no cases of labour trafficking. This reflects the total number of trafficking cases reported to law enforcement agencies. All of the listed grantees are mandated reporters of crimes against minors, which means that these numbers should reflect reports of all minor sex trafficking survivors who have received services from OVC-funded organisations.

Research on federal cases charged in Alaska through the Department of Justice US Attorney's Office presents a slightly different picture: In 2022 and 2023, there were no cases charged; in 2021 there was one case charged that involved a minor victim being paid by a man who molested her; in 2020 there were no cases; in 2019 there were four cases charged involving nine victims; in 2018 no cases; in 2017 one case with two fictitious minors; in 2016 one case with approximately six victims. Prior to that, the last federal case was in 2009, when another young Black sex trafficking survivor was charged federally with conspiracy to commit sex trafficking. 33

Despite the low number of criminal cases of sex trafficking reported to law enforcement or charged, NGOs using their own, non-criminal definitions of sex trafficking report higher numbers. A recent data summary report found that Covenant House, who are mandated reporters serving youth, identified 27 new sex

²⁰¹⁹ was the first year that 'sex trafficking' was categorised separately within the Uniform Crime Report, and subsequently the first year that these numbers were available for Alaska. Alaska Department of Public Safety, Crime in Alaska Supplemental Report: Felony Sex Offenses, 2022, p. 18, https://dps.alaska.gov/getmedia/990f8ea2-aaab-4017-ac17-a7e439ed294e/Felony-Level-Sex-Offenses-2022; Alaska Department of Public Safety, Crime in Alaska Supplemental Report: Felony Sex Offenses, 2021, https://dps.alaska.gov/getmedia/6c564858-ce5b-442e-9203-cd36cbe33cde/Felony-Level-Sex-Offenses-2021; Alaska Department of Public Safety, Crime in Alaska Supplemental Report: Felony Sex Offenses, 2020, p. 20, https://dps.alaska.gov/getmedia/38dd8f78-dd21-48bc-a872-3e9d453f53c3/2020-Felony-Level-Sex-Offenses.

Under US federal law (18 U.S. Code § 1591), it constitutes sex trafficking to patronise a minor engaged in a commercial sex act. In this case, detectives placed an ad online attempting to pimp out two fictitious minors and the defendant agreed to pay for sex with both of them. Alaska Attorney General's Office, 'Anchorage Man Convicted of Attempted Sex Trafficking and Exploitation of Minors', 20 July 2018, https://www.justice.gov/usao-ak/pr/anchorage-man-convicted-attempted-sex-trafficking-and-exploitation-minors.

United States Attorney's Office, District of Alaska, 'News', https://www.justice.gov/usao-ak/pr?search_api_fulltext=sex%20trafficking&start_date=01/01/2000&end_date=12/12/2023&sort_by=field_date&page=3.

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trafficking survivors in a one-year period, and My House (also mandated reporters serving youth) identified 47. The same report shows that police investigated eight reports of sex trafficking and found seven to be unfounded, identifying only one victim in the one-year period. The Alaska Council on Domestic Violence and Sexual Assault, whose definition of sex trafficking includes 'commercialized sex; sex trafficking; commercialized vice; seduction; human trafficking; commercial sex acts; and transporting persons for prostitution', reported serving 37 such presumably adult victims.³⁴

At the March 2024 Alaska Data Summit, which Tara Burns attended, Alaska Assistant Attorney General Chris Darnall explained that the discrepancy between the number of minor victims of sex trafficking reported by mandated reporters and the number reported to police (only 4 in 2022, the last reported year³⁵) is likely due to NGO use of differing and non-criminal definitions of sex trafficking, meaning that there is no trafficker to report to police (or that, if reported, it would not meet the criminal definition of sex trafficking).

Following a statewide task force that existed briefly between 2012 and 2013, the Governor's Office began in 2021 a statewide Council on Human and Sex Trafficking (CHST). The Municipality of Anchorage also has a Human Trafficking Working Group managed through the mayor's office. The USD 750,000 grant that Anchorage received in 2021 is entitled 'Strengthening Services through Action: Anchorage Enhanced Collaborative Model Task Force to Combat Human Trafficking' and describes collaboration between the Anchorage Police Department and the Alaska Native Justice Center to create a human trafficking task force within Anchorage. This is separate from the four grants given directly to the Alaska Native Justice Center between 2019 and 2023.

Substantial federal funding given to Alaska organisations combined with the presence of state and city anti-trafficking task forces (one with federal funding) might suggest a strong institutional response to address human trafficking. As most of the USD 10.7 million Alaska has received from the OVC is marked for

Alaska Governor's Council on Human and Sex Trafficking, Alaska Trafficking Data Summary Document, 2024, https://dps.alaska.gov/getmedia/66080a1e-f3c9-4f3b-b80db4d73a6e1305/2024-GCHST-Data.pdf.

³⁵ Alaska Department of Public Safety, 2022.

Alaska Department of Public Safety, 'Governor's Council on Human and Sex Trafficking', https://dps.alaska.gov/CHST/Home; Municipality of Anchorage, 'Human Trafficking Working Group', https://www.muni.org/Departments/Mayor/Pages/HumanTrafficking.aspx; State of Alaska Task Force on the Crimes of Human Trafficking, Promoting Prostitution, and Sex Trafficking, Final Report and Recommendations, 2013, https://www.law.alaska.gov/pdf/admin/021513-TaskForce FinalReport.pdf.

victim services, stakeholders might assume this institutional response to include a strong system of support for survivors. But human trafficking identification continues to be abysmally low in Alaska; organisations can create exclusionary criteria for who qualifies for their services with little to no accountability. Some OVC grants outline that certain populations must be able to access certain services but do not limit other exclusionary criteria at the organisation's discretion, often unclear until a person inquires about services. Task forces such as the OVCfunded Municipality of Anchorage's Enhanced Collaborative Model Task Force to Combat Human Trafficking and the Alaska State Governor's CHST that are made up of police, prosecutors, and service providers reinforce an already strong pressure for victim service providers to maintain a good relationship with law enforcement, no matter the impact of this on their clients. What kind of experiences for trafficking victims do these combined institutional mechanisms create in spite of or because of such large federal funds? Next, we share Ajela Banks' experiences to illustrate the institutional mechanisms of exclusion that can incentivise organisations to leave certain trafficking survivors out of the loop.

Ajela Banks' Experiences as a Trafficking Survivor in Alaska

Ajela Banks was a victim of trafficking as a minor. At age eighteen, she was placed in a shelter for sex trafficking victims in Alaska run by a church group that has been accused of misuse of funds and other resources meant for trafficking victims.³⁷ Within days of arriving at the shelter, she refused to sexually engage with a detective. In retaliation, he had her kicked out of housing. Homeless again, Ms Banks was quickly targeted for recruitment by new traffickers; anyone who googled her found her missing sexually exploited minor poster, making her an easy target.

Ms Banks and her mother called the police repeatedly begging for protection from her new trafficker, who forced her to engage in prostitution and frequently threatened to kill her. In November 2018, he was arrested for assaulting her, but the case was soon dropped by the prosecution. In December he was released, and on 12 December, he shot Ms Banks three times, leaving her for dead. She was pregnant with his child at the time.

In the hospital, the detective reminded her that she *could* have had his protection, which she understood to mean if she had complied with his sexual advances. Days later, she was arrested and charged federally with conspiring (with her trafficker) to commit sex trafficking. Her testimony helped to convict her trafficker on the federal sex trafficking charges, and she took a plea deal that she was told would allow her to be released from prison to be with her children. She was not advised

³⁷ Nickerson.

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that her address would forever be public on the sex offender registry, allowing her trafficker, his associates, and other traffickers to find her.

At the time of this writing, her trafficker continues to call her from jail, threatening her life if she does not recant her testimony in his trafficking case to help with his appeal and testify in his upcoming shooting case that she actually shot herself. His associates have come to her apartment and threatened her. As of March 2024, her trafficker is also facing a murder charge in another case and has been convicted on an escape charge. Ms Banks' sister has been missing since September 2023 and Ms Banks has received text messages with graphic descriptions of violence committed against her sister and threats that the same will be done to her if she does not comply with her trafficker's demands.

Ms Banks has sought assistance from all of the Alaskan organisations who received federal OVC anti-trafficking funds. Before being shot by her trafficker and charged with sex trafficking in 2019, Ms Banks was in contact with the Alaska Housing Finance Corporation and was on track to receive a housing voucher from them. However, the detective whose sexual advances she had rejected called them just days before he arrested her and told them that she would be put on a sex offender registry, making her ineligible for a housing voucher. In every single Alaskan sex trafficking case involving both minor and adult victims since 2009 the adult has been charged with conspiracy to commit sex trafficking.³⁸ Thus, a significant percentage of Alaskan survivors of the crime of sex trafficking may be ineligible to benefit from the USD 1.3 million in anti-trafficking funds that the Alaska Housing Finance Corporation received.³⁹

Covenant House provided Ms Banks with services both before and after her arrest and conviction. However, these services were centred around housing and could not address her needs for safety from her trafficker and others, who could access her address on the sex offender registry, or her legal needs.

Ms Banks contacted the Alaska Institute for Justice in June 2023. She talked to a caseworker who said they would be able to help her with things like a security camera. However, none of the help materialised and she was not able to get back in touch with the caseworker. Later, she spoke with an attorney at the organisation, who told her their legal services were only for immigrants and advised her to call the Alaska Native Justice Center.

United States Attorney's Office, District of Alaska, 'News'; See, for example: Polaris Project, 'A Survivor Story: Keyana Marshall', https://polarisproject.org/survivorstory-keyana-marshall.

³⁹ In federal sex trafficking cases, judges must order those convicted to register as sex offenders when released. See: Mogulescu and Goodmark.

The Alaska Native Justice Center has received approximately USD 4.5 million in OVC anti-trafficking funds but told Ms Banks in June 2023 that their services were only for Native individuals. On follow up, we learnt that while most of ANJC's services are only for Native individuals, their trafficking services are intended to be available to all trafficking victims. The person we spoke with explained that the receptionist who answered the phone may not have been aware of this.

The Alaska Native Women's Resource Center received USD 800,000 in OVC anti-trafficking funds in 2019. In 2023, they were providing a case worker to sex trafficking survivors who were clients of Covenant House. When asked how she could help Ms Banks, the caseworker explained that she could only offer 'a safe person to talk about these things' and look for 'legal resources to assist you because they do not exist here in Alaska.'40 Shortly after that, the caseworker left her role, and Ms Banks never heard from her replacement.

The precarity and danger of Ms Banks' situation has not just been created by traffickers, it has also been shaped by abuse and mistreatment from law enforcement through established institutional mechanisms. Being criminalised as a felon and required to register as a sex offender have eliminated several options for housing and other services, greatly expanded traffickers' access to her, and continue to endanger her life. Despite repeated and urgent requests to all local agencies receiving OVC anti-trafficking funds, Ms Banks has not been able to obtain legal assistance to have her address redacted from the public sex offender registry, to obtain a security system for her home, or receive any other meaningful assistance except for housing assistance through Covenant House.

Individuals at several of these organisations expressed sympathy and concern for Ms Banks' situation, but only one organisation provided direct services, albeit limited. Organisations often justify their procedural decisions with grant requirements, but the end result of the focus on the institutional processes (case management, qualifications for services, participation in task forces, etc.) rather than survivor agency or increased safety is that Ms Banks felt abandoned and did not receive meaningful assistance from the institutions that claimed to be there to protect her and had received millions in funds to do so.

Discussion and Lessons for Policymakers and Service Providers

We are not suggesting that individuals working within service provision organisations or the organisations themselves are intentionally working to neglect or undermine survivors' safety. Rather, we are arguing that organisations are incentivised to create certain institutional practices (exclusive eligibility

⁴⁰ Interview, Inter-agency caseworker, 20 June 2023.

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requirements, deference to law enforcement, or engagement in task forces) that result in institutional harm and undermine survivors' wellbeing. This is illustrated by OVC funds aligning with federal norms, particularly by emphasising task force participation linked with law enforcement relationships and relying on self-reported data on case management services and the number of victims served. Agencies like the aforementioned Alaska Council on Domestic Violence and Sexual Assault are incentivised to use very broad non-criminal definitions of sex trafficking to include all commercial sex or 'seduction' in order to serve more clients with anti-trafficking funds.

Institutional issues are difficult to address because they are not represented or solved by just one or two changes. Rather, the layered processes described above combine to create survivors' experiences with institutions. Ms Banks' experiences are not just the result of exclusionary criteria to qualify for services or funding strategically focused on expanding organisations with no accountability to the survivors they claim to serve. Ms Banks encountered institutional obstacles and found that different service providers, law enforcement, and advocacy groups had established organisational relationships that reinforced each other. Rather than placing blame on individual organisations in Alaska, this paper attempts to illuminate the ways that federal funding empowers institutions and the processes they focus on more than it empowers survivors.

The implications of this research for policy and institutions mirror many previous calls for change from scholars, activists, and survivors. The criminalisation of trafficking victims reinforces uneven institutional power dynamics, limits opportunities and autonomy for survivors, and compounds already existing institutional discrimination and harm. Alaska has seen cases of independent sex workers charged with trafficking themselves under state law and other survivors like Ms Banks charged federally with conspiracy to commit sex trafficking and placed on the sex offender registry, which creates barriers to services. Legal services should be made more accessible for all survivors; laws should allow for criminal records to be expunged in trafficking cases, be centred around survivors' needs, and be applied evenly across different groups; and institutional structures

Case No. 4FA-13-2273CR, Fourth Judicial District at Fairbanks of the State of Alaska, (details anonymised), retrieved 10 December 2023, https://docs.google.com/document/d/1yP4WBD2qcDb7g3qihIEHSBvlWbmHbx4Y; T Burns, 'Policing the Oldest Profession', *Anchorage Press*, 21 April 2016, https://www.anchoragepress.com/news/policing-the-oldest-profession/article_af06c496-3866-54bc-a29f-dbc696a29702. html.

Research has suggested that criminal expungement laws are unevenly distributed based on perceptions of the survivors' 'worthiness' or 'deservingness'. See A Mayo, 'Punishing Criminals or Protecting Victims: A Critical Mixed Methods Analysis of State Statutes Related to Prostitution and Sex Trafficking', PhD Dissertation, Arizona State University, 2014; C N Baker, 'The Influence of International Human Trafficking

should be reformatted to focus on supporting survivors of violence rather than charging them with criminal activity in the first place.

Referral mechanisms intended to connect survivors to services can help in equipping them to navigate complex systems, but they have also been characterised by some as infantilising and are not sufficient.⁴³ In Anchorage, referral/case management is offered by three OVC-funded organisations, with limited housing assistance provided by two and limited legal assistance for immigrants by only one. Referrals are not helpful when services are exclusive or do not meet basic survival needs. In Ms Banks' case, referrals to service programmes that would not accept her were unhelpful, and long waits for temporary housing only further compromised her safety. Especially in places where referral processes already exist, instead of more case management and referral, funders and service providers should focus on extending material and other desperately needed resources and services, such as housing, legal defence, job training and placement, safety planning, and resources for increased safety. How can anti-trafficking funds be used to meaningfully increase trafficking survivors' safety?

Groups and individuals that have had negative interactions with police, which many trafficking survivors have, are put at greater risk when service providers require or pressure them to collaborate with law enforcement or build a dependence on law enforcement within their institutional structure. 44 More safe avenues of reporting for trafficking survivors who have faced violence at the hands of police need to exist within institutional structures that are not dependent on mandatory contact with law enforcement. Service providers should not require collaboration with law enforcement to provide access to their services and should not deny services to victims who are criminalised by law enforcement.

Separation from law enforcement is not always possible for service providers or community institutions, especially when anti-trafficking task force funding and community credibility require a positive relationship with law enforcement. Being clear with survivors and service recipients about organisational policies regarding collaboration with law enforcement and respectful of all survivors' experiences and preferences with police is essential to respecting clients' autonomy and safety. In Ms Banks' case, a sexually coercive law enforcement officer used victim criminalisation mechanisms against her to create a situation where she was unable to access services, assistance, or safety. Organisational relationships with law enforcement actors through mechanisms like task forces contributed to his success in marginalising her.

on United States Prostitution Laws: The Case of Expungement Laws', *Syracuse Law Review*, vol. 62, 2012, pp. 171–182.

⁴³ Lutnick.

⁴⁴ *Ibid.*; Torres and Paz.

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Service providers typically justify exclusionary criteria through the lens of safety or accessibility, but this reinforces uneven power dynamics and further marginalises those already facing discrimination. Exclusion from services based on substance use, criminalised status, stigma, or moral judgements further stigmatise and make vulnerable those already socially and institutionally ostracised, rendering them more likely to be targeted for exploitation in the future. When criminal history can be used to deny basic survival needs for victims, law enforcement gains another level of institutional power that can be individually wielded. While not all service providers can necessarily meet all needs, the coordination between organisations that task forces claim to provide should ensure that no survivor is turned away from services and that the best positioned organisations take responsibility for all survivors asking for assistance.

Community driven mutual aid and peer support programmes should be taken more seriously as victim services, acknowledged as organisations themselves, offered structural support, and invited to join in the institutional networks (like task forces and state-run advocacy groups) that manage referrals, compile data, and make policy suggestions. Mutual aid services provide need-based direct access to income and other support and can increase survivor autonomy undermined by traffickers and, in many cases, institutions. They challenge the institutional status quo and state power exercised through law enforcement, and their omission from formal, state-sponsored anti-trafficking spaces as not being true victim services represents a similar exclusionary pattern that we see perpetuated against survivors. Including these groups would not only expand service and aid options available for survivors but would provide more institutional accountability directly to community organisers. Sex worker groups who provide mutual aid to survivors, such as COYOTE RI, Red Canary Song, SWOP Behind Bars, and Lysistrata receive no federal funding.⁴⁵

At the federal level, the structure of OVC grant reporting focuses on institutional processes and accountability to law enforcement partners rather than survivors. Performance metrics are largely quantitative rather than qualitative, and self-reported, with little other accountability mechanisms. Federal funding distributors should create community accountability systems that allow for survivors, workers, and service recipients to share their experiences with federally funded organisations and grant structures, in addition to the self-reporting system.

See COYOTE RI, https://coyoteri.org; Red Canary Song, https://www.redcanarysong.net; Sex Workers' Outreach Project Behind Bars, https://www.swopbehindbars.org; and Lysistrata Cooperative, https://rougesupportnetwork.org/lysistratacoop.

Conclusion

This paper examined institutional processes that meet federal criteria for antitrafficking funds through the OVC but fail to protect or empower survivors. It focused on a few organisations in Alaska who have received funds but largely failed to support a trafficking survivor when she needed their help. The authors are continuing to dig further into OVC distribution data, and future research should look at other cases where institutional processes and criteria could be structured differently to create different outcomes for survivors.

Ms Banks' contribution to the paper used a different framework to describe the same institutional processes that the other authors had been discussing around the OVC data, and her narrative allows readers familiar and unfamiliar with these issues to see how they impact survivors in real ways outside of the academic discussion. Ms Burns' experiences advocating for sex trafficking survivors, including another young Black Alaskan sex trafficking survivor who was federally convicted of conspiracy to commit sex trafficking, added credibility and validity by highlighting consistencies between the experiences of Ms Banks and other survivors.

As of July 2024, Ms Banks' life is still in danger. Her trafficker's two felony charges for shooting her have been amended to misdemeanours and the associated charge for violating conditions of release when he shot her has been dismissed by prosecution.

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Understanding EU Funding of Anti-Trafficking Initiatives: Where is the money (not) going?

Isotta Rossoni

Abstract

Critical trafficking scholars have questioned the staggering and ever-rising scale of financial investments in the anti-trafficking industry. While many analyses have focused on the United States, considerably less attention has been devoted to anti-trafficking funding provided by the European Union (EU). This paper draws on an analysis of the results of several EU programmes funding anti-trafficking actions during the 2014–2020 programming period. It describes the type of projects and organisations funded, the countries involved, the amounts awarded, and the potential reoccurrence of funding toward specific organisations. It also presents the findings of a survey of European NGOs working in the field of anti-trafficking to investigate approved and rejected projects, the reasons for rejection, and the key challenges faced in accessing EU funding. The overarching aim is to better understand funding trends against the backdrop of EU anti-trafficking policy priorities.

Keywords: European Union, anti-trafficking, funding, non-governmental organisations, technology

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Introduction

Human trafficking is often described as a 'multi-billion dollar industry',¹ 'a global business',² 'a fundamentally evil, but hugely profitable practice'.³ Accordingly, financial investigations to 'follow the money trail' have become a priority for numerous governments and supra-national actors alike.⁴ This has led to increased funding of organisations developing new technologies to track big money footprints and 'hunt down' criminals. In other words, the business of trafficking has spawned a parallel anti-trafficking business.⁵

Critical scholarship has not shied away from uncovering the 'dark side' of this anti-trafficking business, questioning the motives, rationales, and methods of organisations pledging to combat trafficking. Bernstein has described the strategic alliances between faith-based organisations, governments, and big technology companies embracing narrow and controversial understandings of trafficking⁶ and profiting from the spectacularisation of human suffering.⁷ Scholars have used terms such as 'rescue industry', 'militarized humanitarianism', and 'anti-trafficking industrial complex'⁸ to describe a diverse array of individuals and

OHCHR, 'Human Trafficking: A Multi-Billion Dollar Global Business', 30 July 2014, retrieved 12 December 2023, https://www.ohchr.org/en/stories/2014/07/human-trafficking-multi-billion-dollar-global-business.

² C Niethammer, 'Cracking The \$150 Billion Business Of Human Trafficking', *Forbes*, 2 February 2020, https://www.forbes.com/sites/carmenniethammer/2020/02/02/cracking-the-150-billion-business-of-human-trafficking.

M de Cock and M Woode, *Profits and Poverty: The Economics of Forced Labour*, International Labour Organization, 2014, https://www.ilo.org/publications/major-publications/profits-and-poverty-economics-forced-labour.

J Mari, Following the Money: Compendium of Resources and Step-by-Step Guide to Financial Investigations Into Trafficking in Human Beings, Organization for Security and Co-operation in Europe (OSCE), 7 November 2019, https://www.osce.org/secretariat/438323.

V Tournecuillert, 'Strategically Working in Parallel to Traffickers', *Anti-Trafficking Review*, issue 3, 2014, pp. 163–166, https://doi.org/10.14197/atr.201214310.

G Lonergan, H Lewis, E Tomalin, and L Waite, 'Distinctive or Professionalised? Understanding the Postsecular in Faith-Based Responses to Trafficking, Forced Labour and Slavery in the UK', Sociology, vol. 55, issue 3, 2021, pp. 505–521, https://doi.org/10.1177/0038038520967887; M Thakor and d boyd, 'Networked Trafficking: Reflections on Technology and the Anti-Trafficking Movement', Dialectical Anthropology, vol. 37, issue 2, 2013, pp. 277–290, https://doi.org/10.1007/s10624-012-9286-6.

⁷ E Bernstein, Brokered Subjects Sex, Trafficking, and the Politics of Freedom, University of Chicago Press, Chicago, 2019.

⁸ C Cojocaru, 'My Experience is Mine to Tell: Challenging the abolitionist victimhood framework', *Anti-Trafficking Review*, issue 7, 2016, pp. 12–38, https://doi.org/10.14197/atr.20121772.

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organisations that line their pockets from anti-trafficking. Far from challenging broader neoliberal mechanisms of disparity, which manufacture insecurities and fuel exploitation, these actors contribute to reinforcing neo-colonial, gendered, and racialised approaches to anti-trafficking. More recently, the notion of 'philantrocapitalism' has described a phenomenon that is a product both of our current economic system and of anti-trafficking itself, and embraces market-based solutions to social issues. Philantrocapitalism hinges on governments passing the buck for reform by outsourcing funds to non-governmental or private organisations. 11

In the context of growing attention to these phenomena, some academic work has also focused on funding of anti-trafficking initiatives. Looking at OECD countries, Ucnikova investigated how much money is spent on 'modern slavery' projects and programmes annually. She found that between 2003 and 2012 the US Government was the largest donor of anti-trafficking work. Although funding going toward action to combat 'modern slavery' accounted for less than 1% of aid budget, three countries (US, Norway, and Japan) were responsible for providing over three quarters of the overall budget. Other contributions to the 2014 issue of the *Anti-Trafficking Review* considered anti-trafficking spending in various national settings, such as Ukraine and the UK, Nigeria, and Canada. However, little empirical research or assessments have been produced since, despite the volume and scale of anti-trafficking actions and funding—at both governmental and non-governmental levels—increasing exponentially.

D Peksen, S L Blanton, and R G Blanton, 'Neoliberal Policies and Human Trafficking for Labor: Free Markets, Unfree Workers?', *Political Research Quarterly*, vol. 70, issue 3, 2017, pp. 673–686, https://doi.org/10.1177/1065912917710339.

K Kempadoo, 'The Modern-Day White (Wo)Man's Burden: Trends in Anti-Trafficking and Anti-Slavery Campaigns', *Journal of Human Trafficking*, vol. 1, issue 1, 2015, pp. 8–20, https://doi.org/10.1080/23322705.2015.1006120.

J Chuang and E Shih (eds.), *Philantrocapitalism and Anti-Trafficking*, Beyond Trafficking and Slavery/openDemocracy, London, 2021.

M Ucnikova, 'OECD and Modern Slavery: How much aid money is spent to tackle the issue?', Anti-Trafficking Review, issue 3, 2014, pp. 133–150, https://doi.org/10.14197/ atr.20121437.

¹³ K Sharapov, 'Giving Us the "Biggest Bang for the Buck" (or Not): Anti-trafficking government funding in Ukraine and the United Kingdom', *Anti-Trafficking Review*, issue 3, 2014, pp. 16–40, https://doi.org/10.14197/atr.20121432.

V I Nwogu, 'Anti-Trafficking Interventions in Nigeria and the Principal-Agent Aid Model', Anti-Trafficking Review, issue 3, 2014, pp. 41–63, https://doi.org/10.14197/ atr.20121433.

A Clancey, N Khushrushahi, and J Ham, 'Do Evidence-Based Approaches Alienate Canadian Anti-Trafficking Funders?', *Anti-Trafficking Review*, issue 3, 2014, pp. 87–108, https://doi.org/10.14197/atr.20121435.

As noted by Dottridge back in 2014, limited transparency among governments, international organisations, and civil society concerning funding for antitrafficking¹⁶ continues to present a challenge, including in the realm of EU funding. While a host of research has turned to the USA in a bid to demystify anti-trafficking funding, only limited scholarship has focused on Europe.¹⁷ This article contributes to shedding light on developments in EU anti-trafficking funding through an analysis of available data on projects funded during the 2014–2020 programming period and information gleaned via a questionnaire distributed among a small sample of European organisations. The aim is, firstly, to understand which projects and organisations are receiving financial support for anti-trafficking work, the populations that are being served, and the forms of trafficking which are being prioritised; and, secondly, to explore the challenges faced by NGOs in obtaining EU funding. The article sheds light on relevant funding trends, emphasises the hurdles that NGOs grapple with to run programmes and serve target populations, raises questions around the potential compromises that they might make as a result of EU funding requirements, and makes suggestions for future research.

Context

The terms 'anti-trafficking industrial complex' and 'militarized humanitarianism' describe a modus operandi common among anti-trafficking NGOs which revolves around the application of carceral feminism to the issue of trafficking. This rests on a 'tough-on-crime' approach involving tight-knit collaboration with law enforcement to address a host of concerns viewed as quintessential women's rights issues, including trafficking. The solutions brought forward to counter trafficking are rooted in the increased criminalisation of certain populations—most notably sex workers—and an over-reliance on the criminal justice system. The notion of NGOs building problematic alliances with governments resulting in the social control of specific individuals or groups echoes criminological analyses of the

M Dottridge, 'Editorial: How is the money to combat human trafficking spent?', Anti-Trafficking Review, issue 3, 2014, pp. 3–14, https://doi.org/10.14197/atr.20121431.

For a notable exception, see S Hoff, 'Where Is the Funding for Anti-Trafficking Work? A look at donor funds, policies and practices in Europe', *Anti-Trafficking Review*, issue 3, 2014, pp. 109–132, https://doi.org/10.14197/atr.20121436.

¹⁸ A Terwiel, 'What Is Carceral Feminism?', *Political Theory*, vol. 48, issue 4, 2020, pp. 421–442, https://doi.org/10.1177/0090591719889946.

R Heynen and E van der Meulen, 'Anti-Trafficking Saviors: Celebrity, Slavery, and Branded Activism', *Crime, Media, Culture: An International Journal*, vol. 18, issue 2, 2022, pp. 301–323, https://doi.org/10.1177/17416590211007896.

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penal voluntary sector's role in the administration of punishment.²⁰ Like critical trafficking scholarship, these analyses have critiqued the bourgeoning collaboration between NGOs, governments, and the private sector, and questioned its reverberations on the sector's ethos and values. Whilst acknowledging these worrisome trends, others have cautioned against viewing the NGO sector as monolithic and urged to take into account the complex dynamics of the non-profit world, which can embrace as well as resist government agendas.²¹

Much of the recent literature questioning harmful anti-trafficking practices speaks of an 'expanding' and 'rising' sector²² responsible for perpetuating damaging practices whilst purporting to 'do good'.²³ Not unlike the penal voluntary sector, the anti-trafficking field is diverse. Some anti-trafficking NGOs in Europe embrace carceral approaches, which portray trafficking as inextricably linked to prostitution and advocate for repressive policies to punish men who purchase sex; yet, there are also organisations viewing trafficking through a labour and human rights lens and denouncing conditions of coercion and exploitation in various sectors, including, but not limited to, the sex industry.²⁴ These contrasting

P J Tomczak and D Thompson, 'Inclusionary Control? Theorizing the Effects of Penal Voluntary Organizations' Work', *Theoretical Criminology*, vol. 23, issue 1, 2019, pp. 4–24, https://doi.org/10.1177/1362480617733724; M Corcoran, 'Dilemmas of Institutionalization in the Penal Voluntary Sector', *Critical Social Policy*, vol. 31, issue 1, 2011, pp. 30–52, https://doi.org/10.1177/0261018310385438.

P J Tomczak, Punishment and Charity: The Penal Voluntary Sector in England and Wales, PhD Thesis, University of Manchester, 2014, https://pure.manchester.ac.uk/ws/portalfiles/portal/54554279/FULL_TEXT.PDF.

J Mendel and K Sharapov, 'Expanding Circles of Failure: The Rise of Bad Anti-Trafficking, and What to Do About It', Global Policy, 18 November 2021, https://www.globalpolicyjournal.com/blog/18/11/2021/expanding-circles-failure-rise-bad-anti-trafficking-and-what-do-about-it.

This growth is taking place against the backdrop of an expanding CSO sector. A CSO can be considered as any organisation 'whose members have objectives that are of general interest and who can act as mediators between public authorities and the public' (T Divjak and G Forbici, *The Future Evolution of Civil Society in the European Union by 2030*, European Economic and Social Committee, 2018, p.3, https://data.europa.eu/doi/10.2864/390387). This can include non-governmental organisations, religious and community-based organisations, and more. Given its hyper-diversity, it is difficult to estimate the size of the European CSO sector, but as of 2014, it engaged approximately 28.3 million full-time equivalent workers (paid and volunteer) in EU countries and Norway, accounting for 13% of the European workforce (see *ibid.*, p. 5). There are no estimations on the number of CSOs or professionals working in the CSO sector on anti-trafficking.

²⁴ I Ferčíková Konečná, 'Excluded but Fighting: Where Are the Voices of Sex Workers and Their Allies in EU Anti-Trafficking Policymaking?', *Social Sciences*, vol. 13, issue 3, 2024, https://doi.org/10.3390/socsci13030148.

conceptual stances are further complicated by the vast variations in the European landscape, where each national and occasionally even local context relies on a specific understanding of the nature and role of civil society. In different countries, cultural and political legacies²⁵ affect the degree of collaboration between NGOs and the national government, and the extent to which NGOs receive government funding. Moreover, the interpretations of trafficking that NGOs and other actors employ are often influenced by the country's politics and approach to a range of related issues, most notably, migration and security.²⁶

Bearing this diversity of motives and approaches in mind is essential when examining access to EU funding. Differing approaches, understandings of trafficking, knowledge and capacity to implement projects all influence NGO financing. Over the past 20 years, EU funding has become one of the chief sources of financial support for NGOs in EU Member States and beyond.²⁷ Despite their role and weight, EU funding mechanisms are complex and difficult to access. EU funding rests on stringent criteria dependent first and foremost on the minute details of each funding programme and call for applications, in turn dictated by EU policies. The mandates of different agencies lead to intricacies over the type of eligible activities and the terms and conditions of funding. Projects are generally expected to be short in duration (2–3 years on average), often leaving organisations scrambling to secure new sources of funding to keep activities up and running. Time constraints stand in stark contrast with the deep-rooted, enduring needs of the people served via NGO activities.²⁸ It is also worth noting that competition over EU funding has increased over the years, on par with the mushrooming of NGOs across the region. Accessing funding opportunities and competing with NGOs are governments and a growing number of private sector actors, including large consultancy firms. At the same time, debates over the transparency of EU funding to NGOs have become more frequent, leading to the publication of reports such as the one by the European Court of Auditors²⁹ and, more recently, by the European Parliament's Policy Department for Budgetary

J Casey, 'Comparing Nonprofit Sectors around the World: What Do We Know and How Do We Know It?', *Journal of Nonprofit Education and Leadership*, vol. 6, issue 3, 2016, pp. 187–223, https://doi.org/10.18666/JNEL-2016-V6-I3-7583.

²⁶ I Rossoni, O Büyükkalkan, and U Erken, 'An Image Is Worth a Thousand Words: Exploring Visual Imagery About Trafficking in the Online Domain – An Italian Case Study', *Journal of Human Trafficking*, 2024, pp. 1–23, https://doi.org/10.1080/233227 05.2024.2335872.

²⁷ Hoff.

M Thomas and VOICE, NGO Perspectives on the EU's Humanitarian—Development—Peace Nexus: Exploring the Challenges and Opportunities, VOICE, 2019.

²⁹ European Court of Auditors, Transparency of EU Funds Implemented by NGOs: More Effort Needed, No. 35, 2018.

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Affairs Directorate-General for Internal Policies, calling for greater scrutiny and accountability.³⁰

Anti-trafficking work, too, has been a recipient of EU funding over the years. The most comprehensive study of EU funding for anti-trafficking initiatives was carried out by scholars at Lancaster University for the European Commission.³¹ It covers the period from 2004 to 2015 and comprises projects awarded to 221 principal grant holders in 62 countries, including 26 EU Member States. The Directorates-General included in the analysis are DEVCO, HOME, JUST, NEAR and RTD,³² which are responsible for an array of different funding programmes. The final dataset comprises 321 funded projects, of which 70% were contracted before the first EU anti-trafficking strategy (2012–2016) was published.

Among the most salient findings of the report is the distribution of funding across countries, entities, and types of trafficking. The authors found that, commonly, organisations acting as lead partners were NGOs, although other principal grant holders included State agencies, international organisations, and universities and research organisations. Forty lead partners had been awarded two or more grants and five received five projects or more. Many principal grant holders (n=51 out of 221 in the sample, 23%) were also partners in other funded projects. The report emphasised that a higher proportion of EU funding was awarded to projects addressing trafficking for labour exploitation than to those addressing trafficking for sexual exploitation, notwithstanding the almost identical number of funded projects focusing on trafficking for labour and for sexual exploitation. The average funding per project on labour exploitation was double that of projects on sexual exploitation (EUR 569,308 and EUR 231,429, respectively). According to the authors, this was problematic in light of the fact that EU data at the time showed that 69% of identified victims were trafficked for sexual exploitation and 80% were women and girls.³³ However, the authors failed

R Ackermann et al., Transparency and Accountability of EU Funding for NGOs Active in EU Policy Areas within EU Territory, European Union, 2023.

S Walby et al., Study on Comprehensive Policy Review of Anti-trafficking Projects Funded by the European Commission – Final Report, European Commission, Directorate-General for Migration and Home Affairs, 2016.

Directorates-General are departments of the European Commission responsible for specific policy areas, similarly to national ministries. DG DEVCO is responsible for international partnerships; DG HOME for migration and security, including human trafficking; DG JUST for justice and human rights; DG NEAR for the cooperation with the EU's neighbouring regions; and DG RTD for research and innovation.

It is worth noting that statistics on trafficking should not be taken at face value, given the differences in understandings of trafficking across Europe affecting inclusion and exclusion criteria, inconsistencies in data collection practices, and more generally, the recurrent over-emphasis on sexual exploitation, reflecting enforcement priorities. See:

to mention that for years, most of the attention and funding in anti-trafficking work had been directed at trafficking for sexual exploitation, and that States and anti-trafficking actors are also obliged to tackle trafficking for labour exploitation and other neglected forms of trafficking, which were still poorly understood and addressed by anti-trafficking actors.

In the 2014–2020 programming period, the Commission allocated over EUR 35 million to anti-trafficking projects.³⁴ Project calls under the Asylum, Migration and Integration Fund (AMIF), a key programme funding anti-trafficking initiatives, have consistently emphasised the need to consult the above-mentioned report when developing project proposals, as well as urged to examine other relevant documents, particularly those 'addressing trafficking for sexual exploitation, as well as the high-risk groups and sectors concerned'35 in the process of grantwriting. The need to take into account the disproportionate targeting of women and girls trafficked for the purpose of sexual exploitation has constantly been reiterated, as has been the plea for gender-appropriate approaches. AMIF calls have also required applicants to focus primarily on non-EU citizens. In a somewhat similar manner, calls under the Internal Security Fund Police (ISFP), another programme funding anti-trafficking work that aligns with AMIF in its focus on the management of external borders, have periodically cited the prevalence of sexual exploitation in the EU and emphasised the 'demand-driven nature' of human trafficking, consistently inviting projects geared towards reducing the demand for sexual services exacted from victims of trafficking.³⁶ In so doing, the remit of funded anti-trafficking action has been neatly carved out—in the past few years, the wording of many calls has rather overtly intimated applicants to address specifically trafficking of women and girls for sexual exploitation. The references to demand have clearly encouraged the development of projects embracing an

R Weitzer, 'New Directions in Research on Human Trafficking', *The ANNALS of the American Academy of Political and Social Science*, vol. 653, issue 1, 2014, pp. 6–24, https://doi.org/10.1177/0002716214521562.

European Commission, 'Questions and Answers – Trends, Challenges and Revision of the EU Anti-trafficking Directive', 19 December 2022, https://ec.europa.eu/commission/presscorner/detail/en/QANDA_22_7780.

European Commission, 'Address Assistance, Support and Integration of Third-Country National Victims of Trafficking in Human Beings', EU Funding and Tenders Portal, retrieved 2 September 2024, https://ec.europa.eu/info/funding-tenders/opportunities/portal/screen/opportunities/topic-details/amif-2020-ag-call05?keywords=human%20 trafficking&tenders=false&forthcoming =false&open ForSubmission=false&closed =true&programmePeriod=2014%20-%202020&frameworkProgramme=31077795.

See, for instance, European Commission, Internal Security Fund – Police. Call for Proposals. Joint Action against Trafficking in Human Beings addressing the Culture of Impunity, ISFP-2019-AG-THB, 26 March 2020, https://ec.europa.eu/research/participants/data/ref/other_eu_prog/home/wp/call-fiche_isfp-2019-ag-thb_en.pdf.

abolitionist perspective on prostitution.³⁷ Arguably, this has automatically put at a relative disadvantage organisations focusing on trafficking for labour exploitation, and even more so, organisations rejecting abolitionism, reducing their chances of accessing funding.

Methods

In order to explore funding dynamics in the 2014-2020 programming period, two main sources were employed to identify projects that fell within the remit of the analysis, namely the Project Results page on the Funding and Tenders page of the European Commission³⁸ and the CORDIS Results platform.³⁹ The reference period selected was 2014–2020 in line with programming; this choice was dictated by the fact that the 2021-2027 programming period is still ongoing and any analysis based on available results at this point would only be partial. The following programmes were included in the analysis: AMIF, ISFP, Internal Security Fund Borders and Visa (ISFB), Rights, Equality and Citizenship (REC), Justice (JUST), and Horizon 2020. These programmes were chosen because they fall under Home Affairs funding, responsible for the bulk of funding for anti-trafficking initiatives. The results of other programmes were scanned using a set of keywords (see list below) so as to pinpoint potential initiatives on the topic of trafficking, supported by other funding mechanisms. Projects funded via the EMPACT actions, provided for under the budgets of EU agencies; through the EU-UN Spotlight initiative; the EU Trust Fund for Africa; the Glo.ACT Initiative, the Development Cooperation Instrument; and the European Development Fund were also consulted but excluded from the analysis, due to the different methods utilised to categorise project data by the different programmes and the difficulties related to retrieving and systematising existing information.

The search relied on the application of filters by programming period (2014–2020) and programme, as well as the keywords 'trafficking', 'human trafficking', 'trafficking in persons', and 'exploitation'. The analysis draws on the definition of trafficking included in Art. 2 of the EU Anti-Trafficking Directive and thus includes any project focusing on trafficking for 'sexual exploitation, forced labour or services, including begging, slavery or practices similar to slavery, servitude,

³⁷ I Vanwesenbeeck, 'Sex Work Criminalization Is Barking Up the Wrong Tree', Archives of Sexual Behavior, vol. 46, issue 6, 2017, pp. 1631–1640, https://doi.org/10.1007/s10508-017-1008-3.

EU Funding and Tenders Portal, EU Funded Projects, n.d., https://ec.europa.eu/info/funding-tenders/opportunities/portal/screen/opportunities/projects-results.

³⁹ See: CORDIS, n.d., https://cordis.europa.eu/search.

or the exploitation of criminal activities, or the removal of organs'. 40 Inclusion criteria comprised thematic focus on human trafficking in its contemporary relevance; receipt of funding under any of the above-mentioned programmes; and project selection and award under the 2014–2020 programming period. Projects were excluded if they did not make any reference to trafficking in the general description or synopsis; if the thematic focus was not on human trafficking (but e.g. firearms or wildlife trafficking); and if they explored slavery in a historical perspective without linkages to contemporary phenomena. It should further be noted that a conservative approach was adopted where projects on child sexual abuse or exploitation were concerned, and available information was scanned to explore whether an explicit link to child trafficking was made.

A total of 242 projects were retrieved via the above-mentioned platforms. A first reading of project summaries published online allowed to make preliminary decisions about inclusion and led to the selection of a total of 53 projects. While the number of selected projects may appear meagre compared to the original search, this derives from the fact that numerous Horizon 2020 results linked to 'trafficking' related to biology and other sciences.

Wherever possible, a more in-depth examination of additional documents concerning project activities, results, and impact was conducted. Given that such documents were generally not readily available, the preliminary selection did not undergo any further modification. Information about selected projects was categorised via an Excel spreadsheet, synthetising the key features of each project (title, total amount requested, EU contribution, type of trafficking addressed, approach to the issue of trafficking, key beneficiaries); the lead partner (organisation name, type, country, and amount awarded); and project partners (names, types, countries, and amounts awarded). To avoid skewing some key findings, the analysis of Horizon 2020 projects was conducted separately. This funding scheme is significantly larger than the others, is broadly devoted to research and innovation, and foresees the involvement of numerous partners from different sectors (profit, non-profit, academia, and public). Thus, a joint analysis would have overshadowed relevant insights related to other programmes. Finally, a follow-up analysis of the Horizon 2020 projects retrieved via the CORDIS platform, which were initially excluded because they did not fit the

European Parliament and Council of the European Union, Directive 2011/36/EU of the European Parliament and of the Council of 5 April 2011 on Preventing and Combating Trafficking in Human Beings and Protecting Its Victims, and Replacing Council Framework Decision 2002/629/JHA, 5 April 2011. It is worth noting that the Directive was revised in 2024 and the definition now includes also the exploitation of surrogacy, forced marriage, and illegal adoption. This revision has not been taken into account.

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above-mentioned criteria (i.e. tagged under trafficking, but without any explicit reference to trafficking in the synopsis or description), was also conducted. This was deemed relevant given the high number of projects tagged under human trafficking that rely on technological solutions to address various forms of organised crime and cybercrime, which may include human trafficking cases.

In addition to the analysis of projects, a questionnaire was created on Qualtrics and disseminated among European and international NGOs via La Strada International, the Global Alliance Against Traffic in Women, the Italian Anti-Trafficking Helpline Numero Verde Antitratta, and the researcher's direct contacts. The aim of the questionnaire was to gather additional data, including regarding organisational approaches to and understandings of human trafficking, challenges faced by organisations in applying for EU funding, and common reasons for the rejection of project proposals. The questionnaire was anonymous.

A key limitation of the analysis is that project result platforms are not regularly updated and funded projects not always listed in full. Moreover, while the CORDIS platform provides relatively satisfactory details on outputs and impact, the Results section of the EC Funding and Tenders website does not. Projects could only be examined based on the summaries provided by the applicants, which often lacked detail and depth. The questionnaire was disseminated via the researcher's networks and thus does not fully capture the variety of NGO experiences with EU anti-trafficking funding.

Results

EU Project and Results (Funding and Tenders Platform – AMIF, ISFP, REC, JUST)

Forty-three projects were extracted from the Project Results platform. Out of these, 25 were funded under AMIF, 11 under ISFP, 2 under JUST, and 5 under REC. Most lead organisations were NGOs (see Table 1), but partnerships often involved a mix of non-profit and government actors. Seven organisations were lead partners in 2 or 3 projects. The country representation of lead partners can be seen in Table 2.

Table 1: Lead Organisations in AMIF, ISFP, REC, and JUST Projects

Type of organisation	Number of projects	Percentage of projects
NGOs	25	58%
Public	9	21%
Research institutions	3	7%
Higher or secondary education establishments	1	2%
Other	5	12%
TOTAL	43	100%

Table 2: Countries of Lead Partners

Country	Number of projects	Percentage
Italy	16	37%
Netherlands	7	16%
Greece	4	9%
Romania	4	9%
France	4	9%
Germany	3	7%
Finland	2	5%
Belgium	1	2%
Cyprus	1	2%
Ireland	1	2%
TOTAL	43	100%

The top four countries—per the total number of organisations represented in project consortia and targeted by the action—were Italy (n=59; 29%), Germany (n=23; 11%), Greece (n=18; 9%), and Spain (n=16; 8%). Only one project in the sample involved activities outside Europe in a range of African and Middle Eastern countries yet did not allocate funding to partners in these countries, as a result of call limitations. The duration of projects was generally two years.

Most projects addressed trafficking for different types of exploitation (n=16, 35%); followed by trafficking for sexual exploitation (n=13, 28%); child trafficking (n=6, 13%), of which 4 focused on child trafficking for sexual exploitation; labour and sexual exploitation (n=5, 11%); trafficking for labour exploitation only (n=2; 4%); projects at the intersections of trafficking and irregular migration

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or smuggling (n=1, 2%); and other (n=3, 7%).⁴¹ Projects were grouped under 'other' if they employed ambiguous terminology such as 'trafficking of women' or 'violence and trafficking', rendering categorisation arduous, or focused on niche areas such as 'mobile banditry and trafficking'. There was also a small number of projects that claimed to focus on trafficking broadly or in a generic manner yet included mention of additional attention to a specific type of trafficking. In such cases, they were categorised both as generic and specific and thus counted twice.

Aside from professionals, who were described as the main beneficiaries in 35% of projects (n=15), the key population catered to were women victims/survivors of trafficking (n=13 projects; 30%). Nine projects (21%) served victims of trafficking in general, although one of them mentioned specific attention to potential victims of trafficking among unaccompanied children, one underscored that 50% of beneficiaries were women, and another included a focus on 'mothers and their children'. Finally, three projects (7%) were addressed to children and young adult victims/survivors of trafficking, one targeted both children and women (2%), and two (5%) lacked direct beneficiaries. Numerous projects highlighted third-country nationals as target population, which is a reflection of AMIF calls being addressed primarily to non-EU nationals. In some instances, nationals of specific countries or regions, such as Nigeria, West Africa, or China, were targeted.

The amount of funding requested ranged from approximately EUR 132,000 to 1,200,000, with the average amount per project reaching almost EUR 427,000. The total amount awarded to the selected projects adds up to a little over EUR 18 million. An interesting finding is that a number of organisations in the sample acted as both lead partners and partners or merely as partners in multiple projects during the analysed period. In some cases, this entailed participating in up to seven projects over 3–5 years. Overall budgets for participation in multiple projects varied across organisations and ranged from approximately EUR 87,000 (an organisation partnering in two projects) to roughly EUR 625,000 (an organisation partnering in seven projects). There was a tendency for many organisations to repartner with the same organisations, which—albeit understandable, considering the need to establish networks of trust—is likely to result in the same organisations disproportionately benefiting from EU funding. This is all the more important when one considers that several EU countries are not represented in the sample and that funding is therefore channelled into specific jurisdictions.

The total is greater than 43 (total number of projects) due to projects indicating multiple types of trafficking (e.g. trafficking in general and child trafficking).

Trafficking-Specific Results

Ten projects on the topic of trafficking were identified via the CORDIS platform for approximately EUR 18 million. Project budgets ranged from as low as EUR 183,000 to as high as approximately EUR 5,000,000. The largest consortium involved almost 30 partners, but there were also instances where large budgets were allocated to a single organisation. Lead partners were all higher and secondary education institutions and mostly located in Spain, the UK, or Germany (two projects each per country). Organisations in Israel,⁴² France, Denmark, and Belgium all led one project. Consortia often involved a wide range of countries within and outside Europe and cross-sectoral collaborations between academia, NGOs, private companies, and higher and secondary education institutions.

Project durations ranged between one and six years. Given that the Horizon 2020 programme focuses on research and innovation, projects incorporated different research elements. Scientific disciplines spanned anthropology, history, health, IT, and more, with some projects taking more theoretical and others more empirical approaches. Projects were categorised based on the specific angle taken on the issue of trafficking, which, given the analytical stance privileged by the programme, was difficult to subsume under the categories used for other programmes. This notwithstanding, the main types of trafficking addressed were child trafficking, labour trafficking and exploitation, and the intersections of human trafficking and migrant smuggling. Two projects embraced a critical stance to trafficking via a public health approach and by critiquing sexual humanitarianism. It is interesting to note that three projects were technology-focused: one rested on elaborate solutions for coastal border surveillance, increasing internal security by preventing cross-border crime such as trafficking in human beings and the smuggling of drugs; another rested on the development of semi-automated tools for risk analysis; and the third explored digital solutions to prevent child sexual abuse and trafficking.

Israel, alongside other non-EU countries, participated in the Horizon 2020 programme as an associated country. See 'Horizon 2020 Country Profiles (2014–2020)', European Commission, n.d., https://research-and-innovation.ec.europa.eu/statistics/framework-programme-facts-and-figures/horizon-2020-country-profiles-2014-2020_en.

Projects Focusing on Technology for Combating Organised Crime/Cybercrime and Slavery

Although the initial screening via the pre-established inclusion criteria yielded a modest number of pertinent results, further analysis of excluded projects was conducted in order to identify relevant trends. These 25 projects, which were tagged in the system as related to trafficking—without precise information as to the specific linkages—involved the development of technological solutions to prevent and fight organised crime and cybercrime. The topics included novel technologies to understand the factors affecting online behaviour related to novel forms of cyber criminality; virtual reality or game solutions to improve law enforcement's decision-making processes in high-stress situations or in interrogations; surveillance technologies offering detection, recognition, identification, and tracking of suspicious vessels at sea; and, more generally, AI for security. The partnerships in these projects involved private companies, universities, think tanks, and public bodies, but hardly any NGOs. Budgets ranged from approximately EUR 70,000 to 17 million.

Furthermore, a number of projects that were excluded from the analysis because they focused on historical events were funded by the programme. These projects investigated slavery in its various manifestations in different countries, in some instances displaying the clear intention of clarifying the impact of historical events on current trafficking trends. However, in this realm, consortia were significantly smaller and budgets more modest, ranging between approximately EUR 160,000 and EUR 2.5 million.

Questionnaire

Twenty organisations completed the questionnaire in full. Of these, 70% (n=14) were NGOs, 15% (n=3) were private companies, and 15% (n=3) identified as 'other'. Most organisations are active at the local (n=9; 45%) or the national level only (n=5; 25%). The remainder (n=6; 30%) stated that they are active at multiple levels, including the EU and international levels. The sample includes organisations of different sizes ranging from micro (<10 employees and collaborators) to small (10–49 employees and collaborators); medium (50–99 employees and collaborators); and large (>99 employees and collaborators), as seen in Table 3.

Table 3: Summary of Organisations in the Sample by Type, Country, and Size

Type of organisation	Number	Percentage	
NGOs	14	70%	
Other	3	15%	
Private company	3	15%	
TOTAL	20	100%	
Country	Number	Percentage	
Italy	11	55%	
Netherlands	4	20%	
France	2	10%	
Belgium	1	5%	
Germany	1	5%	
Poland	1	5%	
TOTAL	20	100%	
Size of organisation	Number	Percentage	
Micro	5	25%	
Small	7	35%	
Medium	5	25%	
Large	3	15%	
TOTAL	20	100%	

Regarding thematic focus, only four organisations (20%) work exclusively on trafficking and one (5%) works specifically on victims' rights. The remainder combine their work on trafficking with work in other areas, such as migration, sex work, LGBTQIA+ rights, or women's rights. Seventy-five percent of organisations (n=15) stated that they provide direct support to victims/survivors of trafficking. Only one stated that the support provided is only legal, with the remaining providing multi-level assistance covering legal, emotional and psychological support, medical assistance, access to accommodation, and access to education, training, and employment.

Regarding the type of trafficking organisations work on, 40% (n=8) stated that they focus on trafficking for sexual and labour exploitation; 20% (n=4) address trafficking for sexual exploitation, labour exploitation, and exploitation of criminal activities; 10% (n=2) tackle trafficking for sexual exploitation, labour exploitation, exploitation of criminal activities, and for the removal of organs; and 10% (n=2) only focus on labour exploitation. Fifteen percent (n=3) stated that they focus

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on all types of exploitation, and 5% (n=1) prioritise sexual exploitation and exploitation of criminal activities.

Forty-five percent of respondent organisations (n=9) rely on EU funding to sustain their activities, yet this is never their only source of funding. In fact, most organisations tap into a range of funding options, often combining national government, local government, and private donor funding. Of the EU programmes under which organisations applied during the 2014-2020 programming period, the most commonly cited was AMIF. Three organisations mentioned additional programmes such as REC, JUST, ISFP, Erasmus+, and the European Neighbourhood and Enlargement Negotiations (DG NEAR) programme. Organisations reported submitting as few as one EU project and as many as 25 either as leads or as partners in the 2014-2020 period. Similarly, success rates varied significantly; some organisations failed to receive funding altogether, despite having applied for one or more projects (in one case up to six projects, all rejected); others enjoyed low success rates (between 1 and 25%), moderate success (26-50%), or good success (51-75%); and one organisation applied for seven projects and received funding for all. The target groups of funded projects included victims/survivors of trafficking defined in a generic manner, posted workers in care work, domestic workers, asylum seekers and refugees, foreign mothers with children, women survivors of sexual and labour exploitation, as well as various professionals (law enforcement, policymakers, and judiciary). Funded activities included research, training for professionals, awareness-raising, information-provision, shelter, and assistance. Total amounts of EU funding obtained during the period, as reported by respondents, ranged between EUR 50,000 and 1,000,000.

Organisations were also asked about the main reasons provided for project rejection. Their responses included technical weaknesses (e.g. gaps in project design, evaluation strategy, etc.), the proposal being partially or wholly not aligned with the priorities of the call or programme, partnerships being considered weak, a low number of beneficiaries, and other factors linked to insufficient programme funding (e.g. meeting the threshold for project approval, yet not receiving funding due to a high number of proposals submitted).

Finally, organisations were invited to share insights into the main challenges they face in securing EU funding for anti-trafficking initiatives. The most frequent answer was the limited grasp of the functioning of EU politics, followed by competition (too many organisations applying for funding) and limited capacity to apply for or manage EU projects. Other reasons included an understanding of trafficking which may differ from the EU-level interpretation, the need to increase staff rates to cover overheads, and being located in rural areas.

Organisations that declared not to rely on EU funding were asked to explain the reasons why they do not apply for EU funds. In most cases, these related to the *complexity* of EU grants, understood primarily in terms of administrative requirements, and in one case, to the requirement for an extensive partnership. Other factors included lack of staff, limited presence in EU networks, and preference for national funds. One organisation mentioned having applied several times for EU funds without succeeding.

Discussion

My analysis confirms only in part some of the trends previously identified by the 2016 review of EU funding for anti-trafficking initiatives as regards the distribution of funding.⁴³ Specifically, in the AMIF, ISFP, REC, and JUST programmes, the main recipients of anti-trafficking funding were NGOs. Certain countries are recurrent in the sample, most likely as a result of the higher number of applications or the quality of proposals. Moreover, many organisations benefit from funding via participation in multiple projects as leads *and* partners. While Walby *et al.* also highlight this trend, they fail to point out that it may derive from the narrow focus of funding calls, which likely favour organisations that more openly or persuasively align with them. Despite Walby *et al.* lamenting the lower budgets allocated to projects focusing on sexual exploitation, as opposed to labour exploitation, ⁴⁴ it is worth noting that, except for research projects identified via the CORDIS platform, only a handful of projects in my analysis addressed labour exploitation, with most initiatives focusing either on trafficking without a specific reference to distinct forms of exploitation or targeting sexual exploitation.

Moreover, project beneficiaries were overwhelmingly women, reflecting project calls priorities and, perhaps, a rather narrow understanding of the experiences of victimisation in trafficking. Although it was not possible, via the information available, to draw definitive conclusions on the approaches embraced by specific projects and organisations, the results seem to indicate that the majority of funded projects align with EU policy trends in terms of focus and target beneficiaries. The attention devoted to sexual exploitation and women survivors or women at risk of trafficking echoes the carceral approaches described earlier.

Funding in the programming period supported various alliances between NGOs and government agencies joining forces to roll out initiatives which too may buy into the priorities of carceral approaches. Horizon-funded projects were significantly more diverse in terms of themes and partnership composition, a finding which may be viewed positively. Nonetheless, the analysis of Horizon results also sheds light on the hefty amount of funding going toward private sector-led projects involving the deployment of technological solutions to combat

⁴³ Walby et al.

⁴⁴ *Ibid.*, pp. 8, 50, 51.

a range of crimes, including trafficking. The exact scope of these projects, based on available information, is not always clear.

Horizon remains one of the most difficult programmes to access given its complexity and is thus almost out of bounds for many non-profits, particularly smaller ones. Relatedly, the NGO questionnaire responses highlight that there remain numerous difficulties in benefiting from EU funding, and that administrative burdens represent a major hurdle. This may prevent organisations, particularly smaller grassroots and community-based ones, from applying for EU funding.

Conclusions

In recent years, a substantial amount of EU funding has gone towards supporting anti-trafficking initiatives in Europe and beyond. This article has highlighted that in line with broader EU policy trends emphasising trafficking for sexual exploitation and demand reduction, funding in the 2014–2020 programming period, particularly under programmes that specifically target trafficking such as AMIF and ISF, appears to have placed significant focus on sexual exploitation compared to other forms of exploitation. Moreover, it has privileged narrow understandings of trafficking victimisation reflected in funded projects' choice of beneficiaries. The analysis has also underscored that there are disparities in access to EU funding in the NGO sector, which can be traced back to a host of relevant factors, including, chiefly, administrative burdens.⁴⁶

A potentially concerning development is the amount of funding going toward various 'tech solutions' developed by broad partnerships of private actors, public bodies, and academia. Many of these solutions are designed to support law enforcement agents in pursuing the EU security agenda, yet their nature, scope, and applicability in relation to trafficking deserves to be questioned and further scrutinised.

This research is limited in that not all EU funding programmes were covered, and the responses gathered via the questionnaire may have been partly influenced by dissemination via networks known to the researcher. A larger sample would have doubtlessly enriched the analysis. Nevertheless, the data indicates that the

L Kapff, M Saunier, and T Van Schoubroeck, EU Financing for NGOs in the Area of Home Affairs, Security and Migration, European Parliament, Directorate General for Internal Policies, 2014, https://www.europarl.europa.eu/RegData/etudes/etudes/ join/2014/490685/IPOL-JOIN_ET(2014)490685_EN.pdf.

⁴⁶ Z Darvas et al., EU Funds for Migration, Asylum and Integration Policies Budgetary Affairs, European Union, 2018, https://www.europarl.europa.eu/cmsdata/147324/20180516-migration-funding-study-updated.pdf.

NGO sector is one of the players that the EU relies upon to carry forward its anti-trafficking agenda. This does not mean that all NGOs subscribe to EU policy priorities. In accordance with scholarship emphasising the vast diversity of the non-profit sector, there were NGOs in the sample⁴⁷ which relayed that the reason for not receiving EU funding relates to their approach to human trafficking. While it was not possible to investigate this claim in further detail—e.g. by exploring whether a pro-sex worker rights stance might hinder access to EU funding—growing appetite for 'end-demand' policies⁴⁸ is likely to impact the type of initiatives and, by extension, the type of organisations funded in the future. The negotiation and bargaining acts of NGOs to access EU funding in cases where money is scarce, or the resistance strategies that they rely upon (e.g. through diversification of funding) could not be captured in this paper and would require further cross-national qualitative investigation.

Undoubtedly, through their initiatives, NGOs and other organisations play an active role in defining the contours of trafficking discourse. They make decisions over those who are deemed vulnerable and those who are not and determine who is eligible for assistance, whether this is funded via EU projects or other initiatives. 49 Future research should look into the main actors who are contributing to 'vulnerability construction' in the field of trafficking by benefiting from EU funding or, indeed, other types of grants at the national and international level. Moreover, scholars should explore the diverse motivations, experiences, understandings of trafficking, and resistance mechanisms—including those connected to funding strategies—of NGO actors working in the field. Analyses of publicly available impact evaluation reports produced via projects may help in better understanding the contents of funded initiatives, the approach embraced, and the extent to which they subscribe to EU policy priorities. In addition, further scrutiny should go into projects that rely on similar or identical partnerships, and organisations that are invested in a range of EU-funded initiatives, especially those funded by the same programme.

Future research should also scrutinise projects focusing on the deployment of novel technologies to combat trafficking. While technology's potential to address social issues is often heralded, it can also act as a tool for state surveillance and

⁴⁷ I.e. questionnaire respondents.

⁴⁸ Ferčíková-Konečná.

⁴⁹ K Glyniadaki, 'Mixed Services and Mediated Deservingness: Access to Housing for Migrants in Greece', *Social Policy and Society*, vol. 20, issue 3, 2021, pp. 464–474, https://doi.org/10.1017/S1474746421000014; N Ratzmann and N Sahraoui, 'Introduction: The (Un)Deserving Migrant? Street-Level Bordering Practices and Deservingness in Access to Social Services', *Social Policy and Society*, vol. 20, issue 3, 2021, pp. 436–439, https://doi.org/10.1017/S1474746421000129.

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repression.⁵⁰ More reflection should go into understanding what technology can offer to create safety and reduce exploitation,⁵¹ but also its potentially negative impact. Finally, EU agencies should make project data readily accessible to the public and guarantee comparability across funding programmes. Access to this information will prove invaluable to 'follow the money' and paint a more accurate picture of EU funding of anti-trafficking initiatives.

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J Musto, M Thakor, and B Gerasimov, 'Editorial: Between Hope and Hype: Critical Evaluations of Technology's Role in Anti-Trafficking', Anti-Trafficking Review, issue 14, 2020, pp. 1–14, https://doi.org/10.14197/atr.201220141.

S Milivojevic, H Moore, and M Segrave, 'Freeing the Modern Slaves, One Click at a Time: Theorising Human Trafficking, Modern Slavery, and Technology', *Anti-Trafficking Review*, issue 14, 2020, pp. 16–32, https://doi.org/10.14197/atr.201220142.



Targeted Funding for Anti-Trafficking Initiatives: An evidence-based anti-oppressive approach

Andrea J. Nichols and Kathleen M. Preble

Abstract

Community-driven research is key to creating evidence-based collaborative systems that meet the multifaceted needs of human trafficking survivors and address oppressions that create vulnerabilities to human trafficking. Programmes and solutions require money and evidenced-informed processes, or they risk investing in systems that will not meet the needs of the intended target populations. This paper reflects on how a community-initiated research project influenced funding to enhance anti-trafficking work in a Midwestern US state. We urge other regions to adopt this model of research and resource allocation in their own anti-trafficking efforts.

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In 2018, ten philanthropic foundations supporting anti-trafficking organisations in the US state of Missouri began to jointly question the best use and effectiveness of their funding. Through the Missouri Collaborative Against Human Trafficking (MCAHT), each organisation contributed to a pool of funding dedicated to researching the needs, demographics, and experiences of survivors in Missouri, leading to an evidenced-based strategic plan. This plan would ultimately guide their future funding decisions and prioritisation of anti-trafficking initiatives. The MCAHT was the first initiative to develop a statewide unified effort to pool resources and develop a multi-level action plan to address human trafficking. As long-time community action researchers involved in anti-trafficking efforts, we were sought out to lead this project. After discussion with the funding consortium and community stakeholders, the project became four-fold. We went on to 1) develop a statewide resource guide, 2) research resource needs and the saliency of those needs, 3) research demographics and forms of human trafficking

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experienced by survivors, and 4) create a statewide strategic plan.¹ In May and June of 2019, we distributed an electronic survey intended to uncover resource needs in social, medical, and legal services and gather demographic data from the perspective of those working with human trafficking survivors in the social, legal, and healthcare service sectors. Overall, 107 research participants who had worked directly with 422 human trafficking survivors in the previous year responded to the survey. In this short article, we focus on the research results informing the strategic plan.

Results Guiding Targeted Funding

The results of the needs assessment revealed that mental healthcare (e.g., counselling/therapy), transitional housing, shelter for adults and minors, and residential substance use disorder treatment/detox were the top-ranked needs. The saliency of needs varied somewhat from region to region; however, mental healthcare and housing were consistently highly ranked.² The part of the research project focusing on demographics indicated higher rates of trafficking for sexual exploitation of people of colour and LGBTQ+ people, and higher rates of labour trafficking of people of colour.³ Poverty was also prevalent in the backgrounds of survivors. Overall, these and other results were intended to inform targeted action, as centre points of anti-trafficking funding agendas of MCAHT members,

See more information about the research methods and findings: A J Nichols and K M Preble, 'A Method to Develop a Statewide Resource Guide, Needs Assessment, and Service Inventory to Respond to Human Trafficking', *Dignity: A Journal of Analysis of Exploitation and Violence*, vol. 7, issue 3, article 4, 2022, https://doi.org/10.23860/dignity.2022.07.03.04, and K M Preble, A J Nichols, and M Owens, 'Assets and Logic: Proposing an Evidenced-Based Strategic Partnership Model for Anti-Trafficking Response', *Journal of Human Trafficking*, vol. 9, issue 2, 2023, pp. 131–147, https://doi.org/10.1080/23322705.2021.1899525.

K M Preble, A J Nichols, and A Cox, 'Working with Survivors of Human Trafficking: Results from a Needs Assessment in a Midwestern State, 2019', *Public Health Reports*, vol. 137, issue 1_suppl, 2022, pp. 111S–118S, https://doi.org/10.1177/0033354 9221089254.

A J Nichols, K M Preble, and A Cox, 'A State-Level Analysis of Demographic Characteristics and Sex Trafficking Experiences of Survivors', *Journal of Human Trafficking*, vol. 10, issue 1, 2024, pp. 51–68, https://doi.org/10.1080/23322705.202 1.2016268; A J Nichols *et al.*, 'An Examination of Sex Trafficking by Race and Ethnicity in the State of Missouri on State and Local Levels: Implications for Anti-Oppressive Practice', *Journal of Human Trafficking*, 2023, pp. 1–16, https://doi.org/10.1080/2332 2705.2023.2225993; K M Preble, A J Nichols, and A Cox, 'Labor Trafficking in Missouri: Revelations From a Statewide Needs Assessment', *Journal of Human Trafficking*, vol. 9, issue 1, 2023, pp. 15–32, https://doi.org/10.1080/23322705.2020. 1855900.

including outreach, prevention, and training efforts as well as strategic planning to address the top-ranked needs.

Strategic Plan

Following deficit identification in the needs assessment, the research team completed the next stage of the project, strategic planning, as a key component to the MCAHT funding requirements and to future funding priorities. The strategic plan was developed in collaboration with a community advisory board of eight professionals and survivors ensuring feasibility. Utilising asset maps, we identified key community resources to leverage strengths already available in communities to address identified needs, which included potential public and private funders. These maps were then used to create a strategic plan using an advocacy-based logic model, which set short- and long-term goals. Currently, the strategic plan for the most salient needs are being used to guide regional and state anti-trafficking efforts, funding goals and priorities, and are also being evaluated for ease of use and effectiveness.

Big Picture Responses to Address Root Sources of the Problem

The results of our research call for big picture funding efforts targeting umbrella issues such as poverty, housing accessibility, and access to behavioural and mental health care. Without addressing health equity and social determinants of health considerations, anti-trafficking efforts will continue to address trafficking after it happens rather than preventing it. Providing band-aid solutions as a substitute for larger scale preventative measures that address vulnerability and root sources of the problem will only result in continued human trafficking.⁵

Identity-based oppression creates vulnerability to human trafficking; as a root source of the problem, it must be included in anti-trafficking responses. Our results show structural racism is reflected and reproduced in vulnerability to human trafficking. In no region in the state were people who are white overrepresented as survivors of trafficking for sexual or labour exploitation. Other research also shows barriers to identification and resource provision experienced by people of colour and gender minorities. Genderism and

⁴ Preble, Nichols, and Owens.

⁵ E Cockbain, 'From Conflict to Common Ground: Why Anti-Trafficking Can Be Compatible With Challenging the Systemic Drivers of Everyday Abuses', *Anti-Trafficking Review*, issue 15, 2020, pp. 155–161, https://doi.org/10.14197/atr.201220159.

heterosexism were other forms of identity-based oppression, evidenced by the disproportionate number of sexual and gender minorities and cisgender women identified as survivors of trafficking for sexual exploitation shown in our results.

The impact of capitalism and challenges to earning a living wage pushes people into poverty, and increases vulnerability to trafficking and exploitation, which is implicated in the extremely high number of survivors who were described as experiencing poverty. Fiscal conservativism and neoliberal policies that defund social services must be addressed to bolster services and reduce economic vulnerability through advocating on a state level for increased tax dollars to drive funding streams into social services. Weak social institutions, weak social safety nets, and systemic barriers to service access experienced by those of minoritised identities create an environment conducive to trafficking for labour and sexual exploitation. Those who experience identity-based oppression are more likely to experience criminalisation, lack of economic opportunities, and lack of access to social safety nets to address needs, leading to further vulnerability.

Coalition action by specialised workgroups to address the needs uncovered in the research to date include: 1) expanding access to mental and behavioural healthcare through online healthcare options, 2) coordinating shelter/housing for minors and adults throughout the state to improve access, and 3) improving services for LGBTQ+ survivors. Coalition action for future directions as informed by the research include advocating for funding streams to: 1) expand public healthcare coverage, 2) increase the minimum wage to provide a living wage, 3) provide free public transportation passes, 4) provide housing vouchers and transitional housing, and more, which are necessary to address vulnerability to trafficking at its root sources.

Funding should be directed to organisations that utilise anti-oppressive practice in their anti-trafficking efforts. Anti-oppressive practice involves critically analysing systems on macro, mezzo, and micro levels to identify and address oppression.⁷ On a macro level, this means political action to advocate for policies that work to address oppression and exploitation, such as poverty alleviation programmes, accessibility of housing, or measures to improve workplace and wage equality. On the mezzo level, anti-oppressive practice includes working with organisations

⁶ E Whalley and C Hackett, 'Carceral Feminisms: The Abolitionist Project and Undoing Dominant Feminisms', *Contemporary Justice Review*, vol. 20, no. 4, 2017, pp. 456–473, https://doi.org/10.1080/10282580.2017.1383762.

L B Gerassi, L B Klein, and M C Rosales, 'Moving Toward Critical Consciousness and Anti-oppressive Practice Approaches with People at Risk of Sex Trafficking: Perspectives from Social Service Providers', *Affilia*, vol. 37, issue 3, 2021, pp. 431–447, https://doi.org/10.1177/08861099211025531; L B Gerassi and A J Nichols, 'Social Work Education That Addresses Trafficking for Sexual Exploitation: An Intersectional, Anti-Oppressive Practice Framework', *Anti-Trafficking Review*, issue 17, 2021, pp. 20–37, https://doi.org/10.14197/atr.201221172.

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to address barriers that are more likely to be experienced by minoritised populations, such as barriers to accessing gender-affirming shelter and racial bias in referrals to mental health care and residential programmes. On a micro level, professionals working in various sectors must critically reflect on their own positionality in relationship to their clients, discuss aspects of oppression their clients experience, and incorporate cultural humility in their practice. Inclusivity in imagery and wording on websites as well as outreach, organisational, and training materials is another aspect of anti-oppressive practice. Requests for proposals by those funding anti-trafficking initiatives and organisations should require components of anti-oppressive practice and big picture actions. We suggest donors in other sites similarly engage in research to uncover the most effective use of funding to best meet the needs of human trafficking survivors.

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T Bryant Davis and P Tummala-Narra, 'Cultural Oppression and Human Trafficking: Exploring the Role of Racism and Ethnic Bias', *Women & Therapy*, vol. 40, issue 1–2, 2017, pp. 152–169, https://doi.org/10.1080/02703149.2016.1210964.

⁹ L B Gerassi and S Skinkis, 'An Intersectional Content Analysis of Inclusive Language and Imagery Among Sex Trafficking-Related Services', *Violence and Victims*, vol. 35, issue 3, 2020, pp. 400–417, https://doi.org/10.1891/VV-D-18-00204.

How I as a Fundraiser Would Use Twenty Million Dollars for Anti-Trafficking Work

Kiran Gupta

Abstract

Representations of human trafficking in film and media have widely missed the mark by misinforming the public and funders and harming those with lived experience. This has real implications for the anti-trafficking movement, including a lack of sufficient financial support for victim services and the failure to implement long-term systemic change. To change this, this article argues that we must invest in narrative change around human trafficking, under the leadership of those with lived experience. If done well, this could potentially bring additional funding for services by reaching the wider public, and even move the needle on trafficking prevention.

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The call for papers invited authors to reflect on the question 'What would be the best use of twenty million US dollars for anti-trafficking work?' If every person working on human trafficking in the United States were to answer this question, I would anticipate a lack of consensus. This suggests a healthy debate, but a lack of clarity is confusing to funders. I will answer the question from my experience working in the areas of fundraising and communications for a US-based human trafficking service provider.

I argue that, beyond guaranteeing services for victims, we need to trace the roots of our movement's challenges and prioritise evidence-based narrative change about human trafficking. In social justice work, we say that storytelling is key to advocacy and that data is hard to digest. I recently asked a group of high school pupils what human trafficking was and one began to answer with, 'It's when people

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are kidnapped'. According to the Counter Trafficking Data Collaborative, only 3% of human trafficking victims were abducted into their situation.¹

What is missing is not increased *awareness* of human trafficking as an issue but creating *authentic* and *accurate* film and media depictions of it, for example, by exploring who are the most common victims and traffickers, what are the most common methods of control, and what are the solutions, according to survivors. The point of accuracy is not pedantry; inaccurate depictions of human trafficking have real-world implications. For example, many victims today are unable to identify that what they have experienced is human trafficking; even some organisations that exist to support crime victims are unable to do this—likely leaving thousands in the US without support.

Stories matter.

Film, media, and politicians have for years propagated misinformation and disinformation about human trafficking, causing the issue to be misconstrued by the American general public. Many films purporting to be about human trafficking sensationalise the issue beyond the most verifiably common survivors' experiences, limiting depictions to, for example, violent kidnapping of white, middle-class children and teenagers—usually girls—or smuggling people across the US-Mexico border, neither of which in and of themselves constitute human trafficking. As a result, most people will report having heard about human trafficking, citing films and news reports that peddle racist stereotypes and avoid explorations of root causes of trafficking, such as systemic racism,2 oppression, and poverty. Simply because of what they have seen and read, many Americans may still not know that forced labour is a form of human trafficking, or that trafficking is experienced by US-born citizens. Onscreen depictions of victims often lean on stereotypes about immigrants and 'other' groups whose traffickers are their violent compatriots and not, for example, large American companies. According to the National Survivor Network, the only values-based membership association of survivors of human trafficking in the US, In 2008, the movie Taken presented a riveting image of human trafficking that captivated the public imagination and brought human trafficking to the forefront of many people's attention. Some people may assume this is a good thing, and yet for the past 15 years most antitrafficking professionals (including those of us who have lived experience of human trafficking) have had to work harder than we otherwise would have to

¹ 'Abducted Victims', Counter Trafficking Data Collaborative, n.d., retrieved 9 July 2024, https://www.ctdatacollaborative.org/story/abducted-victims.

² US Department of State, 'Acknowledging Historical and Ongoing Harm: The Connections Between Systemic Racism and Human Trafficking', 1 July 2021, https://www.state.gov/acknowledging-historical-and-ongoing-harm-the-connections-between-systemic-racism-and-human-trafficking.

counter widespread misinformation rooted in a Hollywood understanding of how trafficking happens.²³ The legal definition of human trafficking in the US is broad and encompasses exploitation for commercial gain though 'force, fraud or coercion'.⁴ Yet, film and media depictions like *Taken* have focused almost exclusively on violent methods of force (kidnap), missing the opportunity to demonstrate how, for example, invisible psychological control within relationships and at workplaces is used to exploit vulnerable people. Many on-screen depictions of human trafficking feature arrests of minors engaged in 'prostitution' (despite this automatically making them trafficking victims in the US), providing true-crime style entertainment while also reinforcing the concept of law enforcement as the primary and best instrument of anti-trafficking responses—something contested by many organisations, including my own.

Of known victims of human trafficking in the US, the majority are Black, Indigenous and People of Colour (BIPOC) and at least half are US citizens;⁵ however, as of this writing, few if any US-made films about human trafficking created by BIPOC survivors have reached mass audiences. This tracks with documented trends in disproportionately low BIPOC representation behind the camera in Hollywood: between 2014 and 2020, 78 percent of documentary films distributed across cable, network, and streaming platforms were created by white directors or directing teams.⁶

National Survivor Network, 'Hollywood and Human Trafficking', 24 July 2023, https://nationalsurvivornetwork.org/hollywood-and-human-trafficking.

Victims of Trafficking And Violence Protection Act, 2000, https://www.govinfo.gov/content/pkg/PLAW-106publ386/pdf/PLAW-106publ386.pdf, Sec. 103 (8): "The term "severe forms of trafficking in persons" means— (A) sex trafficking in which a commercial sex act is induced by force, fraud, or coercion, or in which the person induced to perform such act has not attained 18 years of age; or (B) the recruitment, harboring, transportation, provision, or obtaining of a person for labor or services, through the use of force, fraud, or coercion for the purpose of subjection to involuntary servitude, peonage, debt bondage, or slavery.'

US Bureau of Justice Statistics, 'Characteristics of Suspected Human Trafficking Incidents, 2008–2010', 28 April 2011, https://bjs.ojp.gov/press-release/characteristics-suspected-human-trafficking-incidents-2008-2010. In the fiscal year 2022–23, 88% of victims served by the Coalition to Abolish Slavery and Trafficking were BIPOC, and 62% were US citizens. See also: Coalition to Abolish Trafficking and Slavery, *Impact Report 2023. 25 Years of Justice, Healing and Inclusion of Survivors of Human Trafficking*, Cast, 2024, pp. 5–6, https://www.castla.org/wp-content/uploads/2024/03/CastLA_2023ImpactReport_3-9-24_Lighter-v2.pdf.

⁶ C Borum, P Weissman, and D Conrad-Pérez, The Lens Reflected: What Stories & Storytellers Get the Green Light in Documentary's Streaming Age? Race, Gender, and Topics in Documentary Films Distributed Across Cable, Streaming, and Public Media Networks (2014–2020), Center for Media & Social Impact, November 2022.

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It is clear that the public and policymakers want to see films about human trafficking and that they are influenced by them. The 2023 film *Sound of Freedom* grossed almost USD 250 million in the US. As one journalist noted, this film alone—'in which every villain is Latino and the hero is a lone white man' and which ends with the main character 'canoeing into the jungle alone to rescue a little girl, fighting her trafficker in hand-to-hand combat and ultimately killing him'—has 'awakened the passions of a broad swath of the right-wing and conspiratorial world', including QAnon.⁷ Despite widespread pushback from survivors and news media⁸ about the accuracy and representativeness of the film, it was screened to members of the US Congress in July 2023. There are now so many films considered to be harmful that at least 100 survivors of human trafficking from around the world have created a list of survivor-vetted films;⁹ though most are documentaries and not explicitly about human trafficking, they are highly relevant.

Intentional or not, such inaccurate depictions are at least partially responsible for the aforementioned poor understanding of human trafficking among the public. 10 The stereotypes bred as a result are not only barriers to progress, they are downright dangerous and a threat to justice, as survivors have frequently pointed out: 'In at least one case, traffickers were found not guilty when the violence they enacted against their victims doesn't "look like" what juries have come to believe trafficking is... [Disinformation] can even lead to the deaths of survivors when rescue operations that lack adequate preparation for the complex realities of trafficking go wrong...'11 By dealing in and popularising false narratives, these depictions are also jeopardising funding initiatives for victim services and all parts of the anti-trafficking movement.

To counter harmful, sensationalistic stories, regain control of human trafficking narratives, and build a critical mass of informed Americans (including funders) supporting human rights approaches to anti-trafficking, we must invest in narrative change on human trafficking by supporting the creation and dissemination of

A Merlan, 'Trafficking Survivors and Advocates Are Being Harassed by "Sound of Freedom" Fans', *Vice*, 7 August 2023, https://www.vice.com/en/article/epvbyz/trafficking-survivors-and-advocates-are-being-harassed-by-sound-of-freedom-fans.

⁸ K Abrams, "Sound of Freedom" Misleads Audiences About the Horrible Reality of Human Trafficking', *USA Today*, 28 July 2023, https://www.usatoday.com/story/opinion/2023/07/28/sound-freedom-movie-wrong-trafficking/70470178007.

⁹ 'Survivor-Vetted Films About Human Trafficking', n.d., retrieved 9 July 2024, https://docs.google.com/document/d/1CpP8cfdExeZ1WTcadAmGiaM53GcwjiFrzCK1 BeXFnJY.

K Sharapov, S Hoff, and B Gerasimov, 'Editorial: Knowledge is Power, Ignorance is Bliss: Public Perceptions and Responses to Human Trafficking', *Anti-Trafficking Review*, issue 13, 2019, pp. 1–11, https://doi.org/10.14197/atr.201219131.

National Survivor Network.

authentic, accurate depictions that are verifiably common while also nuanced, with mass appeal. Without generalising, we must tell new, compelling stories that point to the root causes of human trafficking and solutions to it, moving away from simplistic narratives about ideal victims who unluckily—or through a level of naïveté—found themselves in a bad situation, and not because compounding socio-economic and geo-political factors made them vulnerable. Critically, we must create opportunities for survivors—especially BIPOC—to be the creators of this narrative change. This is arduous, expensive, long-term work that cannot be done with a one-year grant. 'We' includes the entire film and media ecosystem, but our movement *must* make the case that demand for commercially-successful survivor-led storytelling can be created; as of this writing, *Baby Reindeer*, written by and starring its (white male) protagonist, based on his experience of stalking, harassment, rape and sexual assault, is Netflix's tenth most-watched Englishlanguage series of all time.¹²

The problem and solution is money. Within and across a coalition of anti-trafficking organisations, USD 20 million could be spent on:

- 1) Advocating for, training, and collaborating with the television and film industry to produce authentic, accurate portrayals of human trafficking and its intersecting issues, because of the indisputable impact of storytelling in popular culture in cultivating empathy for others and social change. In the long term, this means greater access, resources, and opportunities for BIPOC survivors to get their stories in front of the public.
- 2) Hiring communications, research, and policy experts who understand human trafficking to craft and amplify accurate, digestible messages about it. Many organisations already do this but need to evolve with changing media trends such as social media, which many young people turn to for news and education. To promote their work, many human trafficking organisations use sensational language and tired clichés about 'rescuing' and 'saving' victims. It is up to those working directly with survivors to forge new, accurate, norm-setting messages about human trafficking that do no harm.
- 3) Training journalists on how to make their human trafficking and related reporting ethical and more impactful, because of the media's influence on public opinion. Drawing on survivor-led messages, media outlets need training and ongoing technical assistance in navigating our complex issues

S Hailu, 'Netflix Top 10: "Baby Reindeer" Becomes No. 10 Biggest English-Language Series Ever, "Under Paris" Scores Massive Debut', *Variety*, 11 June 2024, https://variety.com/2024/tv/news/netflix-top-10-streaming-ratings-3-1236041392.

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without peddling stereotypes. Some have already started this work, but it deserves substantial, committed financial investment.

All this work must be informed or ideally led by survivors, who must be properly paid for sharing their lived experiences and expertise.

These three ideas alone could reach tens of millions of Americans, catalysing many human trafficking organisations' missions by mobilising citizens and influencing public policy. In turn, this could lead to changes in the interests and giving behaviour of funders of all kinds, as was seen in the revived popularity of racial justice funding in the US in 2020 and beyond, albeit imperfect and insufficient. Paradoxically, many public and private funders in the US will only fund tangible, direct services for survivors of human trafficking and are less moved by narrative change or communications projects designed to raise awareness. However, if done well, we could potentially increase the volume of funds for survivor services by reaching the general public with authentic and accurate narratives, and maybe even move the needle on trafficking prevention. More and more people will see themselves in these stories and come forward for help, and decisionmakers will be better informed about how and where to address trafficking. Survivors will feel seen and validated.

None of this is new to those working in this movement. We all encounter misapprehensions about our work every day. This is not easily solved, but successfully deploying issue-based storytelling is a well-documented tool for social justice movements. Those of us in human trafficking nonprofits are nobly chasing funds to keep our doors open, leaving little room for creative endeavours, even though, by potentially reaching millions, uncertainty about funding could be reduced. Too few funders currently want to finance narrative change work, even though their stated goal is helping organisations like my own to achieve their missions of ending human trafficking.

This is why I would spend the USD 20 million on long-term narrative change work under the leadership of survivors, including film and media programmes that would amplify our movement's collective expertise and call people and funders into our cause. It would inform a curious public about the realities of human trafficking, and what needs to be done to end it.

D Whiteman, 'Reel Impact: How Nonprofits Harness the Power of Documentary Film', Stanford Social Innovation Review, vol. 1, issue 1, Spring 2023, pp. 60–63, https://doi.org/10.48558/PY4Q-MT02.

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Pay Survivors for Our Lived Experiences

Tamara MC

Abstract

This short paper argues that to address the exploitation of survivors' labour in anti-trafficking work, it is essential to allocate funds towards compensating survivors for their contributions. This funding should prioritise paying survivors for sharing their expertise and lived experiences, which are invaluable for effective anti-trafficking efforts. Establishing a standard pay rate, commensurate with other expert consultants, would validate survivors' roles and contributions, promoting sustainable engagement and preventing further exploitation within the anti-trafficking movement.

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The call for papers invited authors to reflect on the question: What would be the best use of twenty million US dollars for anti-trafficking work? To answer the question bluntly: pay human trafficking survivors for our contributions to anti-trafficking work.

I am a victim of trafficking for labour exploitation and sexual exploitation and grew up in a Sufi cult in Texas from the late 1970s to the early 1990s. I was married at 12 to a community member and chosen as the 'special girl' to work for the leader and his three wives, caring for their multiple children. I worked seven days a week, often more than 20 hours a day. I was denied sleep, food, and even water. I was locked up in a house, in a room, from which I could not escape. Eventually, my traffickers fled the United States because of issues with the government, and I lived with them abroad. Finally, when I was 20, after my husband married another woman and I was now in a polygamist marriage, I was able to flee.

I enrolled at university and graduated with a Bachelor's degree. My curiosity was insatiable, and I went on for a Master's degree and then a Ph.D. I learnt to think critically, which was a skill in which I was highly deficient. Now, as a social

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scientist, I research how language is used to manipulate vulnerable populations. I pull apart structures and systems, looking at how words are exploited to take advantage of those who do not have the same power. Recently, I have been studying power differentials in the anti-trafficking field, especially when it comes to survivors' work.

As a survivor, I am continuously asked to 'volunteer' my time to share my story, to educate, to write, research, speak... The list goes on. The very word volunteer seems like an oxymoron when it comes to survivors' work. According to the Oxford Dictionaries, the meaning of a volunteer is 'a person who freely offers to take part in an enterprise or undertake a task'. Ever since I left my trafficking situation, I have struggled with finances. I live off a very limited budget because of my disabilities that are a consequence of my trafficking and because I have dedicated my life to fighting against gender-based violence and coercive control. I struggle daily to pay my rent, bills, etc., so that I may create lasting change in this world for survivors like me.

There are many people who offer to do something they are not paid for, such as retirees, people with partners, or those with disposable income, time, and resources; but is this the case for most survivors? I would argue many of us cannot give freely of ourselves because we are struggling to provide for our basic needs. Yet, when anti-trafficking and survivor organisations ask us to volunteer our time and labour for their cause, they are perpetuating the very thing they stand against—labour exploitation. While they may not be doing this intentionally, they are ignoring a whole set of circumstances, which are gravely missing for survivors.

Due to my trafficking experience, it is hard for me to stand up for myself and demand that I be paid. Unlike others in society who have been taught to be compensated for their work, I was given the exact opposite message: I should be of service and should give to the point of pain because if I do not, I will be considered greedy, selfish, and self-absorbed. This is what the cult taught me to ensure I was their unpaid labourer. If I did not do as I was told, I would be beaten, raped, or shunned.

My body was taught to work for free. This was my survival mechanism and likely why I am still alive today. Now that I am free from my cult—I am using the word 'free' lightly because I will never be fully free; my cult is always there, even if subconsciously—my old traumas kick in and I naturally give. It is what I know most and do best. Anti-trafficking organisations should be aware of this and ensure survivors are paid for our labour. Organisations must bring up the conversation of money immediately, letting us know we will most certainly be paid and how much, instead of putting us in the position of asking. Despite how vocal I am in the anti-trafficking movement, I am still timid when it comes to speaking about money.

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It is not happenstance that after fleeing, I joined careers, such as academia, writing, teaching, and nonprofit work, that typically expect exorbitant amounts of labour without adequate and fair pay. Most of these professions are typically seen as 'women's work'. While academia has many male professors, the majority of 'service' work often falls on women. A paper in *Research and Higher Education* found that women participate in more internal versus external service, perpetuating the myth that women are not only expected to do free labour in the home but also in the academic sphere. If we bring this to anti-trafficking work, who are the volunteers? Do you usually see women or men? Survivors' free labour is intrinsically linked to gender, race, disability, and so much more. It is a deeply rooted problem that needs to be analysed further.

Survivors will likely do whatever it takes to survive in our post-trafficking world—our survival is consciously and unconsciously linked to helping others—meaning we will work for free to be of service to others who still have not left their exploitative circumstances. We never want anyone to go through what we went through. So, we will spend our lives creating lasting change for future generations—at any cost. But the question remains, if we provide our services without pay, have we really re-entered a post-trafficking world, or is it just more of the same?

Anti-trafficking and survivor organisations should be the first to step up and pay survivors involved in anti-trafficking work for our invaluable service. We are not only being asked to revisit our trauma, but also to provide our expertise, which has been acquired through a lifetime of lived experiences and knowledge of the field that those who have not been trafficked lack.

Anti-trafficking organisations cannot function without survivor leaders. We are the core of change and *must* be compensated for all our labour—physical, emotional, and mental. Value is linked to money, and if survivors are not offered monetary compensation for our services, our value diminishes. What message does this carry? People who work in anti-trafficking organisations do not work for free. They receive pay checks for the hours they work, and so too should lived experience experts. Rather than being the ones whose labour is overlooked, survivors should be held at the highest regard. Without us, there would be no research, studies, policies, etc.

Prioritise dollars in budgets to support the engagement of people with lived experiences, and ensure the compensation reflects and is commensurate with rates paid to other types of experts. The US federal contractor rate, which currently

¹ C M Guarino and V M H Borden, 'Faculty Service Loads and Gender: Are Women Taking Care of the Academic Family?', Research in Higher Education, vol. 58, 2017, pp. 672–694, https://doi.org/10.1007/s11162-017-9454-2.

stands at USD 81.25/hour or USD 650/day is a good benchmark for survivors hired as contractors. However, I advocate that this should be the minimum rate. It is important to remember that some individuals may charge significantly more for their services based on professional qualifications. In addition, organisations should pay survivors a 'trauma tax' that goes towards our wellness before and after speaking engagements, training, advocacy, group facilitation, etc. Importantly, it should never be mandated that we share personal or intimate details of our trauma as a precondition for our work.

Survivors constantly balance the feeling of being helpful with the feeling of being exploited. We do not owe the world our goodwill, generosity, or stories. We have far exceeded our do-good quota.

I am afraid that by bringing up this topic, anti-trafficking organisations will stop using survivors altogether since they will not be able to 'afford' us. This is the excuse we are often given. When organisations write grants, they need to add a line item for paying survivors. This should be standard protocol. Much of the dollars they ask for should go directly to lived experience experts' consulting hours.

I do not want to distract from anti-trafficking organisations' very important work because they are doing essential labour, for which I am grateful. Rather, I am hoping organisations will rethink future collaborations with survivor labourers. Paying survivors is a matter of priority. Each of us is capable of creating lasting change.

Dr Tamara MC is a cult, child marriage, and human trafficking lived experience expert, who advocates for humans to live free from gender-based violence and coercive control. She obtained her Ph.D. in Applied Linguistics and researches how language exploits vulnerable populations. She attended Columbia University for an M.F.A. and has been honoured with fellowships at Bread Loaf, Sewanee, Ragdale, Cave Canem, and VCCA. She has published in media outlets including *The New York Times, New York Magazine, Newsweek, Salon*, and the *Los Angeles Review of Books*. She is currently working on her debut memoir, *Child Bride: Escaping an American Sufi Cult.* She can be reached via her website: https://tamaramc.com.

ANTI-TRAFFICKING REVIEW

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We welcome submissions from a diverse range of actors, including academics, practitioners, trafficked persons and advocates. The *Anti-Trafficking Review* particularly welcomes contributions from those with direct experiences and insights to share.

The Anti-Trafficking Review is aimed at a wide readership. It therefore encourages submissions that are in clear, jargon-free English with appropriate but not excessive citation.

Articles should be previously unpublished and should not be under consideration for publication elsewhere. All articles go through a rigorous double-blind peer review process.

Please refer to the journal's website (www.antitraffickingreview. org) for the journal's full style guide and guidelines for contributors.



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The Anti-Trafficking Review promotes a human rights-based approach to anti-trafficking. It explores trafficking in its broader context including gender analyses and intersections with labour and migrant rights. It offers an outlet and space for dialogue between academics, practitioners, trafficked persons and advocates seeking to communicate new ideas and findings to those working for and with trafficked persons.

