From 'Modern Slavery' to Modern Complicity: The corporatisation of western anti-slavery INGOs

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Abstract

Review of the book *Advocacy, Inc. INGOs and the Business of "Modern Slavery"* by Stephanie A. Limoncelli, Stanford University Press, 2026, ISBN: 9781503644823.

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'Modern slavery' has emerged as one of the most rhetorically powerful concepts of the twenty-first century. Despite having limited legal traction beyond the United Kingdom and Australia, the term has become a catch-all signifier to identify all categories of unacceptable exploitation—slavery, servitude, forced labour, child labour, forced marriage, slave labour, bonded labour, and human trafficking.[1] This label, which functions less as a precise legal category and more as a moral, emotional, and political device to mobilise attention and resources, has been uncritically adopted by politicians, media houses, charities, United Nations bodies, scholars, and corporations. Whilst critical anti-slavery literature has long problematised the 'modern slavery' discourse, sometimes framing it as an imperial project serving the agendas of Western states and corporations,[2] its rhetoric appears to be critique-proof.[3] It ignores, absorbs, and deflects critiques, co-opts adjacent social and political issues like conflict, county lines, cuckooing, online compound scamming, or climate change, and aligns with corporate

1 J Fudge, *Constructing Modern Slavery: Law, Capitalism, and Unfree Labour*, Cambridge University Press, Cambridge, 2025.

2 K Kempadoo and E Shih (eds.), *White Supremacy, Racism and the Coloniality of Anti-Trafficking*, Taylor & Francis, London and New York, 2022.

3 A Bunting and J Quirk (eds.), *Contemporary Slavery: The rhetoric of global human rights campaigns*, Cornell University Press, Ithaca, 2018.

governance agendas.[4] These are not accidental alignments. The 'modern slavery' rhetoric serves multiple political purposes.

It is within this landscape that Stephanie A. Limoncelli's latest book *Advocacy, Inc. INGOs and the Business of "Modern Slavery"* offers a much-needed critique of anti-slavery international non-governmental organisations (INGOs). The central argument of the book is that anti-slavery INGOs are increasingly entangled with corporate interests that reproduce the very inequalities and exploitative systems they aim to dismantle. In short, this alignment serves capitalism. By paying close attention to the 'actions, communications, and operations' (p. 13) of anti-slavery INGOs, Limoncelli persuasively argues that they are increasingly becoming 'like for-profit businesses in their strategies, communications, and operations, and their actions are doing little to address the driving forces that have created conditions for unfree labour in the global economy' (p. 3).

This beautifully written book takes the reader on an empirical journey through the transformation of anti-slavery advocacy by INGOs: from the framing of 'modern slavery' and the adoption of business-oriented, market-based strategies to becoming like businesses in their communications and operations, thereby highlighting their complicity through corporate alignment. The book opens with an anonymised case study of an anti-slavery INGO called 'Global Slavery Fighters', which provides a snapshot of this transformation and prepares the reader for what to expect from the book. Using fifty interviews with members of forty INGOs across nine Western countries, together with an analysis of 524 documents and 1,900 pages of online texts produced by these INGOs, Limoncelli guides us through their gradual transformation via six empirical chapters, each building on the previous one.

In the first chapter, Limoncelli critiques the prevailing criminal justice response to solving the problem of 'modern slavery' by arguing that: 'Portraying issues of "modern slavery" as criminal business activities obfuscates the political economy of unfree labor and stymies the potential for a more robust and broad-based civil society response' (p. 23). She argues that by focusing on crime, INGOs individualise the issue and obscure how state policies, economic precarity, and global inequalities create the conditions for unfree labour to persist. Businesses, often complicit in exploitative practices, are positioned as potential 'agents of change' which shields them from accountability for their practices.

[4] A Bhagat and A Kenis, 'The Modern Slavery–Climate Change Nexus: Resurrecting Environmental Determinism, Reinforcing Saviourism and Absolving the West', *Antipode*, vol. 58, issue 1, 2026, pp. e70125, https://doi.org/10.1111/anti.70125.

In the second chapter, she further develops the argument by examining the consequences of framing anti-slavery as a business concern: anti-slavery INGOs' advocacy not only casts businesses as saviours but also as victims vulnerable to reputational risks. By highlighting corporate vulnerability to 'modern slavery', these INGOs position exploitation as something to be managed, rather than abolished. This positioning serves business interests and allows them to thwart accountability for exploitation and deflect attention onto external actors.

The third chapter offers a diagnosis of why and what happens when anti-slavery INGOs enter into relationships with businesses. Limoncelli observes that, 'the perception that INGOs "have to" partner with businesses, weaken[s] their ability to hold them accountable […] and help[s] to shift the focus from workers to businesses; businesses in some sense become their constituents and business interests become INGO concerns' (p. 69). Whilst these anti-slavery INGOs describe themselves as 'critical friends' to business in the name of saving 'modern slaves', Limoncelli powerfully argues that they end up prioritising corporate engagement over improvements in labour conditions. This partnership not only dilutes these organisations' power to call out corporate exploitation but also compromises their integrity, thereby making them complicit in sustaining exploitative systems by placing corporate interests above those of workers. She warns that business collaborations transform these INGOs from watchdogs into consultants who prioritise business interests, such as minimising reputational harm, thereby shifting responsibility for addressing 'modern slavery' onto consumers.

In the fourth chapter, Limoncelli explores the rise of technological solutions adopted, promoted, and capitalised on by anti-slavery INGOs. She highlights a range of tools, including apps, data platforms, and blockchain technologies, and argues that although these are presented as innovative ways to address exploitation, 'they tend to reinforce simplified notions of unfree labor that can create more problems than they solve, such as increasing surveillance of workers or the public, and they rarely include workers or labor groups as partners in their development' (p. 93). She persuasively argues that this growing embrace of technosolutionism depoliticises advocacy—it increases the dependence of these INGOs on businesses and creates the impression that technological fixes can address the structural causes of unfree labour and exploitation.[5] She then effectively argues that these solutions could easily be weaponised against workers.

[5] See also 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

The fifth chapter highlights the communication strategies of these anti-slavery INGOs. Limoncelli suggests that anti-slavery '[…] INGO communications contribute to the belief that consumers can buy their way to a less exploitative world and reinforce ideas about the efficacy of individual actions and market solutions in addressing issues of "modern slavery"' (p. 120). These communication strategies of INGOs attempt to reduce complex systems of exploitation to matters of consumer morality. This not only commodifies public engagement but also transforms political struggle into lifestyle branding, thereby depoliticising advocacy. Limoncelli argues that donors play a crucial role in this depoliticisation process, and in the high-pressure, cutthroat funding environment, INGOs choose to align with donors' priorities rather than demanding systemic reform.

Extending this argument in the final empirical chapter, Limoncelli shows how anti-slavery INGOs' adoption of businesslike structures and operations transforms them into service providers who could never stand in solidarity with workers. She concludes that this hybridisation reinforces 'the neoliberal belief in markets and private approaches to social problems, [… and] redefine[s] civil society as a space for parallel private institutions' (p. 162). This neoliberalisation of social issues depoliticises activism against severe labour exploitation, serves business interests, and makes these INGOs complicit in the very system of exploitation that they claim they are trying to dismantle. She concludes the book by emphasising that 'INGOs and the "anti-slavery" field can only benefit from reflexive and continuing critiques and analyses of these trends' (p. 175).

This statement marks the juncture at which I part ways with Limoncelli's book. After convincing us that anti-slavery INGOs' business entanglement depoliticises advocacy, serves capitalism, damages collective political action, and reproduces the very inequalities and exploitative systems they aim to dismantle, Limoncelli adopts a reformist stance and recommends that: anti-slavery INGOs should push states to uphold labour and workplace standards; partner with unions and other NGOs to protect workers and combat unfree labour; focus on addressing root causes, such as poverty, and prioritise workforce upskilling; use laws and agreements to ensure corporate accountability; and adopt more worker-centred approaches by implementing programmes led by the workers themselves. Whilst these interventions are firmly established in critical literature on unfree labour,[6] I am not convinced that anti-slavery INGOs are in a position, or even the right organisations, to implement them for at least three reasons.

[6] S McGrath, B Rogaly, and L Waite, 'Unfreedom in Labour Relations: From a politics of rescue to a politics of solidarity?', *Globalizations*, vol. 19, issue 6, 2022, pp. 911–921, https://doi.org/10.1080/14747731.2022.2095119; J Fudge and G LeBaron, 'Regulatory design and interactions in worker-driven social responsibility initiatives: The Dindigul Agreement', *International Labour Review*, vol. 163, issue 4, 2024, pp. 575–598, https://doi.org/10.1111/ilr.12440.

First, critical anti-slavery literature has long established that the 'modern slavery' paradigm is not designed to address the structural causes of labour exploitation.[7] This means that those INGOs working under the banner of 'modern slavery' are unlikely to press for structural change and, as Limoncelli herself demonstrates, may end up being complicit in the process. Second, this literature has firmly established that dominant anti-slavery interventions which rely on criminal justice responses often do more harm than good, perpetuating the proverbial 'collateral damage' on their targets,[8] while rights-based approaches have achieved only limited success.[9] So when Limoncelli, in the very first empirical chapter, establishes that the majority of these INGOs frame unfree labour as 'criminal businesses', I wonder whether it is feasible to ask organisations that have made an industry out of criminal justice responses to 'modern slavery' to relinquish their reliance on them. It is bad for their business. Third, many of these recommendations fall within the purview of trade unions and grassroots movements, and by asking anti-slavery INGOs to work in solidarity with them, Limoncelli's recommendation could be interpreted as urging anti-slavery INGOs of the minority world to capitalise on such efforts already taking place in the majority world. Hence, rather than calling for the outright abolition of these corporatised anti-slavery INGOs and the redistribution of their aid funds to the people affected by anti-slavery interventions and labour exploitation, or even advocating reparations for transatlantic slavery and colonialism, Limoncelli attempts to reform these problematic INGOs, thereby making a case for their continued existence and expansion.

Relatedly, the book ignores the discussion of race, white supremacy, and coloniality10 in its analysis of anti-slavery INGOs. It focuses primarily on organisations from the white, Western, minority world, many of which position themselves as the saviours of the global majority by forming corporate-style partnerships with national-level NGOs and advocacy groups. Whilst the introductory page signposts the neo-imperial stance of these anti-slavery INGOs by highlighting how they support 'partner organizations in countries of the global south, conducting media campaigns and awareness raising on issues of "modern slavery"' (p. 1), the book does not offer any substantive analysis of race and

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7 E Kenway, *The Truth about Modern Slavery*, Pluto Press, London, 2021; J O'Connell Davidson, *Modern Slavery: The Margins of Freedom*, Palgrave Macmillan, New York, 2015.

8 Global Alliance Against Traffic in Women (GAATW), *Collateral Damage: The Impact of Anti-Trafficking Measures on Human Rights around the World*, GAATW, Bangkok, 2007.

9 K Kempadoo and J Doezema (eds.), *Global Sex Workers: Rights, resistance, and redefinition*, Routledge, New York, 1998.

10 Kempadoo and Shih; L Beutin, *Trafficking in Antiblackness*, Duke University Press, Durham, 2023; M Marmo and R Bandiera, 'Maintaining coloniality through capitalism: Benevolent state-corporate interventions in modern slavery to protract colonial status quo', *Studi Emigrazione*, vol. 62, no. 238, 2025, pp. 182–190.

coloniality despite the well-documented history of anti-slavery initiatives as tools of colonisation.[11] Rather than examining the imperial and colonising functions of these anti-slavery INGOs in disciplining NGOs of the majority world,[12] the book presents this as a gap, highlighting that 'How "anti-slavery" nonprofits headquartered in the global south navigate business influence and relationships would help to fill a gap in the literature that has often been focused on organizations in the West' (p. 169). Similarly, whilst the book briefly mentions that 'INGOs can be engaged in neocolonial agendas, perpetuating the interests of global north states' (p. 13), it does not give much attention to the role of these so-called 'global north' states in the minority world in sustaining the anti-slavery industry, both within their own territories and across the world. I understand that the book is about anti-slavery INGOs and their corporate partnerships. However, these anti-slavery INGOs operate under the aegis of minority world states,[13] work closely with states to deliver care services in their territories,[14] rely on corporations to cover the funding deficit in victim care services, contribute to transmitting the language of 'modern slavery' across the world,[15] and subscribe to a system that makes them complicit in allowing corporations to avoid accountability.[16] Highlighting this trifecta relationship between anti-slavery INGOs, Western states, and corporations would have further strengthened the book's critique.

Finally, whilst the book brilliantly critiques the corporatisation of anti-slavery advocacy, it surprisingly spares academics, many of whom engage and collaborate with INGOs and businesses, mimicking the same communication strategies under critique here to disseminate their 'impactful' anti-slavery research and advocacy. It seems that the book is written from a distance. It focuses on the entanglement of anti-slavery INGOs and businesses, but leaves out academics, many of whom

[11] J Quirk, *The Anti-Slavery Project: From the slave trade to human trafficking*, University of Pennsylvania Press, Philadelphia, 2011.

[12] R Broad and N Turnbull, 'The global governance problem with framing human trafficking as "modern slavery": The experiences of international actors in human trafficking policymaking', *International Criminology*, vol. 4, 2024, pp. 358–370, https://doi.org/10.1007/s43576-024-00146-0.

[13] J Findlay, 'Modern Slavery, Victim Identification and the "Victimized State"', *The British Journal of Criminology*, vol. 65, issue 3, 2025, pp. 504–520, https://doi.org/10.1093/bjc/azae061.

[14] R Broad and D Gadd, *Demystifying modern slavery*, Routledge, Abingdon, 2022.

[15] A Bhagat and J Quirk, 'Do We Really Need a Global Commission on Modern Slavery?', *OpenDemocracy*, 10 April 2024, https://www.opendemocracy.net/en/beyond-trafficking-and-slavery/do-we-really-need-a-global-commission-on-modern-slavery-theresa-may-modern-slavery/; Bhagat and Kenis.

[16] G LeBaron and A Rühmkorf, 'The domestic politics of corporate accountability legislation: Struggles over the 2015 UK Modern Slavery Act', *Socio-Economic Review*, vol. 17, issue 3, 2019, pp. 709–743, https://doi.org/10.1093/ser/mwx04.

operate within the same neoliberal logics and are equally entangled between these INGOs and businesses. Many anti-slavery scholars routinely take consultancy projects, collaborate with these very INGOs, using their names when pitching for grants, use their 'partner' organisations to do fieldwork in the majority world, evaluate projects for them, participate and attend their exclusive and expensive conferences, serve as their board members, receive awards, and, most importantly, change their positionality depending on their career stages. The intellectual space of 'modern slavery' also produces exclusive cliques, clubs, groups, and networks that mirror the corporate and INGO worlds under study. In other words, whilst Limoncelli's book offers a detailed critique of INGOs, it does so from a distance, leaving out the role of academics who engage with these organisations and operate within the same neoliberal logics under critique.

The book makes an important and timely contribution to the critical 'modern slavery' literature by demonstrating that the corporatisation of anti-slavery advocacy is neither accidental nor benign. The empirical richness of the book convinces us that anti-slavery INGOs' association with corporate logics reinforces the very systems they supposedly aim to dismantle. It exposes the true face of anti-slavery INGOs. It will appeal to anti-slavery scholars, students, policymakers, and practitioners interested in the political economy of anti-slavery advocacy. It should also appeal to these INGOs and their donors to correct their current paths and to chart out new ways to incrementally improve labour conditions. At the same time, the book invites critical reflection on how advocacy, scholarship, and reform intersect with structures of power, raising important questions for future research and practice.

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