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# GOVERNMENTS AS INTERMEDIARIES OF FORCED LABOR DATA

Policy Dialogue Series

**Outcome Document**  
May 2025

**TECH  
AGAINST  
TRAFFICKING** 

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## I. OVERVIEW

[Tech Against Trafficking](#) (TAT)'s [research](#) published in early 2024 highlighted that the public sector collects and stores significant amounts of forced labor data through various frontline public services and law enforcement activities. These include police investigations, labor inspections, anti-trafficking hotlines, and border authority operations. However, despite the volume of data gathered by public sector actors, it is not widely shared with external stakeholders.

As a result, there is limited understanding within the broader anti-trafficking community—including businesses and civil society organizations—regarding the types of data collected by governments on forced labor, how this data is shared among government entities and third parties, and how government-held data points might be leveraged to strengthen global anti-trafficking efforts, including those led by the private sector.

To explore these issues, TAT convened a series of virtual and in-person dialogues with leading policymakers from various governments and intergovernmental organizations between September and December 2024.

The main objective was to create a forum to discuss the current landscape of government-led data collection and information sharing related to forced labor cases, and to identify opportunities for greater collaboration with external stakeholders—including the private sector—in light of emerging global regulations on forced labor and mandatory human rights due diligence (see Annex for a list of relevant regulations). The dialogue series had three core objectives:

1. Build on TAT's research to identify the challenges faced by governments and companies in collecting and sharing quality, verifiable forced labor data
2. Explore the role of technology and data for enabling sustainable public procurement
3. Outline potential opportunities to enhance forced labor data collection and sharing efforts between private and public sector actors, including through multistakeholder initiatives such as TAT

This outcome document provides a high-level summary of the key insights and recommendations from the dialogue series. It serves as an addendum to the report *Building an Effective Data Ecosystem to Address Forced Labor in Global Supply Chains*, published by Tech Against Trafficking in March 2024.

## II. KEY FINDINGS

- Government agencies (such as customs protection, immigration authorities and labor inspectorates) and government departments (such as labor, justice or procurement) are holders of a significant amount of data points that may indicate actual or potential instances of forced labor in the private economy.** This includes law enforcement data (police investigation records, labor inspections or trade enforcement action), country or regional-level aggregate data on forced labor push and pull factors (e.g. migration corridors) and supplier performance or compliance data. In most cases, critical data points are managed by different departments and agencies with limited centralization, and it is unclear to what extent information is shared across departments.
- While most sensitive information is not published, some government-held information on forced labor is made available in the public domain and serves to inform priority due diligence focus areas for the private sector and civil society.** Widely used examples of government-published sources of information on forced labor include the [U.S. Department of State Trafficking in Persons Report](#) (TIP) and the [US Department of Labor \(ILAB\) List of Goods Produced by Child Labor or Forced Labor](#). These are routinely used by multinational companies as a source to map potential risks of forced labor by country or commodity type during human rights due diligence. While these data sources offer a useful starting point for risk identification, they lack granularity on risks linked to specific locations (e.g. city or subregion) or business partner. Other sources of information include ad hoc public reports of official development assistance-funded projects on forced labor. Several governments also host public registries<sup>1</sup> of company modern slavery statements, although they do not routinely serve as a source for risk identification for corporate entities.
- As with private sector efforts, there are significant limitations of current public databases on forced labor.** Current efforts to create comprehensive forced labor databases, which are accessible and open source, are fragmented and incomplete. They do not provide an overall, clear forced labor risk picture to governments or other actors. Moreover, current databases are largely static, mostly capturing “likelihood of risk” and have limited information on actual risk, specific incidents and subsequent due diligence and remedial action. Part of this is also due to the limited sample and size of datasets.

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<sup>1</sup> For further information, visit Australia’s Modern Slavery Statements Register: [Modern Slavery Statements Register](#), Canada’s Public Safety Catalogue of Reports: [Catalogue of reports](#), UK Modern Slavery Registry: [Modern slavery statement registry - GOV.UK](#)

- **While significant amounts of data are being collected by governments, it is unclear which precise data points are sufficiently granular in terms of industry and location to enable third-party organizations – including the corporate sector – to prioritize and assess risk on the ground.** Where government information and datasets exist, further research is required to better ascertain which government-collected data points would be useful to – and feasibly shared with – external actors to strengthen forced labor risk identification and mitigation strategies. It is also necessary to understand which current datasets that are already publicly available could be leveraged as proxy indicators (e.g. on visa issuance, migrant corridors) on the prevalence of forced labor in certain sectors and locations.
- **There is an absence of a harmonized approach to collecting, storing and sharing relevant data on forced labor across government departments and agencies.** Currently, governments employ a variety of terms including forced labor, modern slavery, human trafficking which has an impact on the types of data collected and how it is stored. While the [International Labor Organization's \(ILO\) forced labor indicators](#) appear to be the reference standard of choice for governments consulted, it is unclear how governments use these indicators to make a determination on forced labor. Governments cited the importance of developing common indicators to ensure that data collection efforts are harmonized and data points comparable.
- **There is no coherent, global approach to collaboration on forced labor data and limited input from governments in mid- to lower-income countries.** While there is a recognition that governments in middle and lower-income countries where large volumes of products and services are sourced from need to be part of these efforts, forced labor is a sensitive diplomatic issue which can limit international collaboration. Most global indexes on modern slavery are built on estimates from limited samples which do not offer a dynamic picture over time, but rather point at a specific evidence in a given time. Government actors also recognize the need for increasing engagement with and input from experts in their anti-trafficking strategies, including on questions related to data.
- **Technical, operational, and legal barriers prevent governments from more extensive information-sharing on forced labor.** These obstacles bear many similarities to those faced by private sector actors. In addition to the barriers detailed in [TAT's 2024 report](#), government-specific nuances include:

- **Technical**
  - **Lack of data infrastructure:** Many government agencies lack the data infrastructure to enable the cleaning, sorting and sharing of government-held data internally and with external partners.
  - **Cost:** Data interoperability and standardization requires significant investment to build a technical infrastructure (e.g. hiring of internal expertise or contracting of third parties to build secure data sharing solutions) which may be deprioritized by government departments in the face of other priorities.
- **Data interoperability and standardization**
  - **Lack of clear and common definitions:** Different terminology related to modern slavery is used by governments which makes comparability of data points extremely challenging. There is no standardized application (or associated guidance) of the ILO indicators for governments.
  - **Absence of standardized formats or protocols:** There is an absence of standardized formats and protocols for data sharing for private sector and public sector actors in this space.
- **Legal / institutional**
  - **Procedural aspects:** Government rules prevent the use of forced labor data for external use. Existing means for verification and validation of forced labor data require time, limiting the ability to share information in real time.
  - **Contract terms with third parties:** Contract language with supply chain partners may not allow for sharing data outside of a specific government agency.
- **Data privacy and security**
  - **Data privacy or data protection laws:** Relevant laws may restrict the extent to which a government organization can share data it holds with third parties.
  - **Data veracity:** As public agencies, governments need to double down on authenticating data sources, which may delay or limit publication of relevant data points on forced labor.
- **Others**
  - **Geopolitical sensitivities:** Sharing sensitive data on forced labor publicly has the potential to damage trust between governments and place strain on bilateral relationships.

- **Beyond data-sharing barriers, governments face significant challenges in acting on forced labor data findings.** The threshold for enforcement action is high and requires substantial inter-agency coordination to verify and respond to information provided by third parties. This is a critical factor in shaping how governments may enforce sanctions in the coming years.
- **Promising practices in how government departments and agencies leverage technology to support sustainable public procurement, but these efforts have yet to scale.** Governments are increasingly adopting third-party platforms to map and assess human rights risks in their procurement processes and are piloting focused due diligence initiatives in specific geographic areas. While still limited in scope, these efforts demonstrate that data is becoming an effective entry point for government procurement departments to engage suppliers on human rights and securing institutional buy-in for further action.
- **Corporate suppliers must be active contributors to the forced labor data ecosystem, and there is a need for more targeted support from both governments and multinational buyers.** Small and medium-sized enterprises have highlighted the need for clearer government standards and requirements on forced labor, more tailored guidance on specific issues (such as recruitment fees), and greater harmonization of digital tools.

### III. RECOMMENDATIONS

#### For public sector entities

- **Build and incorporate a forced labor data collection strategy into the current national anti-trafficking strategy/program** (or equivalent) in consultation with the private sector, civil society organizations (CSOs), and lived experience experts. Key elements could include:
  - Conduct comprehensive mapping of current forced labor data points collected by relevant departments and agencies (e.g., Department of Labor and Customs Protection), which can inform the identification of risks in global supply chains
  - Integrate data collection and sharing practices into national anti-trafficking inter-agency task force objectives
  - Run and participate in private sector consultations, including with small and medium-sized enterprises, to understand and validate the types of forced labor data that could support third-party actors—including the private sector—in carrying out human rights due diligence on forced labor

- Collaborate with internal data teams and/or external providers to identify key technological needs for strengthening data-sharing architecture at the departmental/national level. Allocate resources to scale digital services and technological advancements across agencies to support these processes
- Invest in responsible AI solutions that can process large volumes of unstructured data to generate actionable insights and intervention measures
- Ensure data privacy and implement privacy-preserving mechanisms for rightsholders by leveraging technology assets designed by the private sector
- Adopt cross-industry standard on forced labor for business (as detailed below) and incorporate it into existing corporate guidance on addressing forced labor in supply chains
- Allocate resources to build the necessary technological infrastructure to enable greater data sharing on forced labor with internal and external stakeholders. This includes more strategic and sustainable funding for NGOs and other non-profits developing promising tools as open-source services
- Contribute to fostering public-private partnerships, including by leveraging existing Tech Against Trafficking workstreams, to enable the integration of multiple datasets that provide actionable insights on forced labor, and identify policy instruments to overcome the legal, institutional, and commercial barriers that may hinder greater data sharing (e.g., GDPR rules)

### **For public-private partnerships**

- As part of a broader standardization effort on forced labor data, private and public sector entities could work together through a Tech Against Trafficking pilot to:
  - Develop a list of specific government-collected data points that are not currently open source but may help inform corporate anti-trafficking efforts on the ground, and jointly identify opportunities to overcome legal, operational, and technical barriers to sharing them
  - Identify public datasets collected by governments that serve as proxy indicators of forced labor and complement the ILO indicators
  - Develop a common protocol to collect and share data on forced labor, which can be adopted by private and public sector entities
  - Develop public datasets/databases on forced labor aligned with business needs, through learning exchanges and public-private consultations
  - Promote and adopt a cross-industry standard on forced labor for business. This standard should outline a menu of effective and streamlined data



points for use at various stages of the due diligence process (e.g., desktop vs. on-site assessments), define key terms, and establish thresholds for triggering further human rights due diligence.

- Support the development and piloting of relevant technologies for data sharing to enable the integration of datasets from diverse stakeholder groups—including governments—to provide actionable insights that help organizations in the public sector, corporate sector, and civil society make informed decisions on forced labor prevention and mitigation
- Continue to offer a space for dialogue between private and public sector actors on the forced labor data ecosystem, including through collaboration with other platforms (e.g., Alliance 8.7) and with input from experts with lived experience and governments from middle and lower-income countries

In 2025 – 2026, Tech Against Trafficking will implement these recommendations on public-private partnerships through a forced labor data standardization effort. It will also continue and finalize a pilot program to develop a protocol to connect disparate forced labor datasets and provide actionable insights to help organizations in the public sector, corporate sector and civil society make informed decisions on forced labor prevention and mitigation. The objective is to produce a scalable architecture that is affordable and accessible to a range of organizations.

## ANNEX

### HUMAN RIGHTS DUE DILIGENCE AND MODERN SLAVERY LEGISLATION

Laws and regulation targeting forced labor in corporate supply chains can be summarized in three non-exclusive categories:

- **Human rights due diligence laws:** Requirements for entities to carry out due diligence on actual or potential adverse human rights or environmental impacts within their own operations and supply chains, including on forced labor
- **Modern slavery reporting laws:** Requirements for entities to publish public reports and disclosures on their efforts to address modern slavery risks in own operations and supply chain
- **Trade restrictions/product bans:** Trade instruments such as restrictions on the import, export, and/or sale of goods suspected of being made with forced labor

Table 1 – Non-exhaustive list of modern slavery legislation at national or regional level

Country	Legislation	Type
Australia	<i>Modern Slavery Act, 2018</i>	Reporting law
Canada	<i>Fighting Against Forced Labour and Child Labour in Supply Chains Act, 2023</i>	Reporting law
European Union	<i>Regulation (EU) on Prohibiting Products Made with Forced Labor, 2024</i>	Trade restriction
European Union	<i>Corporate Sustainability Due Diligence Directive, 2024</i>	Human rights due diligence law
France	<i>Duty of Vigilance Law (Loi de Vigilance), 2017</i>	Human rights due diligence law
Germany	<i>Supply Chain Due Diligence Act, 2023</i>	Human rights due diligence law
United Kingdom	<i>Modern Slavery Act, 2015</i>	Reporting law
United States	<i>Section 307, Tariff Act of 1930</i>	Trade restriction
United States	<i>Uyghur Forced Labor Prevention Act (UFLPA), 2021</i>	Trade restriction

## OVERVIEW OF TECH AGAINST TRAFFICKING

[Tech Against Trafficking](#) (TAT) is a coalition of leading technology companies collaborating with global experts to help eradicate human trafficking and modern slavery using technology.

Founded in 2018, TAT's current members include Amazon, Google, HPE, Meta, Microsoft, and TikTok. TAT supports the anti-trafficking field by tapping into these companies' technical expertise, capacity for innovation, and global reach. Together, this group works with anti-trafficking experts to identify and scale promising technologies and address the misuse of technology to facilitate human trafficking.