



Universiteit
Leiden
The Netherlands

The Discourse of NGO Networks on the Problem of Human Trafficking
Chalmers, Petra

Citation

Chalmers, P. (2021). *The Discourse of NGO Networks on the Problem of Human Trafficking*.

Version: Not Applicable (or Unknown)

License: [License to inclusion and publication of a Bachelor or Master thesis in the Leiden University Student Repository](#)

Downloaded from: <https://hdl.handle.net/1887/3240333>

Note: To cite this publication please use the final published version (if applicable).



Universiteit
Leiden

The Discourse of NGO Networks on the Problem of Human Trafficking

Petra Chalmers

s2521040

Political Science - International Organisation MSc

Word Count: 9908

11 January 2020

Supervisor: Dr. Müge Kınacıoğlu

Second Reader: Dr. Jewellord Nem Singh

Abstract

This study is a comparative discourse analysis of anti-trafficking NGO networks in the UK and Sweden examining how they reflect the framing and narratives of trafficking promoted by the state via prominent policies. The two anti-trafficking NGO networks compared here demonstrate the differing discourses and ways of representing human trafficking which is highly dependent on the hegemonic powers, norms and history in their sociopolitical environment. By focusing on sex-trafficking in Sweden and forced labor or general exploitation in the UK, these NGO networks reflect the dominant framing of the trafficking problem in their country. These framings will vary by locale and tie in a variety of secondary or interrelated issues which will in turn affect the presentation of the problem of human trafficking. The connection to and reflection of discourse promoted by state powers in non-governmental organizations shows that these groups, though technically separate, are not immune to the influence of hegemonic power narratives.

Table of Contents

1. Introduction and Research Question	3
2. Trafficking Policies and NGO Networks in The UK and Sweden	4
3. Academic Relevance	5
4. Literature Review	6
5. Theoretical Framework	9
6. Methodology	11
7. Case Studies: The UK & Sweden	13
8. Legislative Influences	16
8.1 The Modern Slavery Act and Trafficking Policy in The UK	16
8.2 Sweden's Nordic Model and Trafficking Policy	18
9. NGO Networks	19
9.1 Anti-Trafficking Monitoring Group	19
9.2 Swedish Civil Society Platform Against Trafficking in Human Beings	21
10. Discourse Analysis of Two Anti-Trafficking NGO Networks	23
10.1 UK ATMG	23
10.2 Sweden CSTHB	29
11. Findings and Discussion of Research	32
12. Conclusion	35
References	37
Appendix 1: Acronyms	41
Appendix 2: Source Documents	42

1. Introduction and Research Question

Human Trafficking is a global issue and requires both international and intranational measures to combat this crime against humanity. Different European countries, as popular destination states, have adopted varying approaches to combating the crime and exemplify different sociocultural approaches to the problem.

Interorganizational civil society cooperation has taken on an increasingly prominent role, expanding beyond the sole handling of the issue by governments via police and courts.

The UK and Sweden utilize well established formal NGO networks in anti-trafficking efforts but these networks engage with very different perceptions of the trafficking problem. This research examines to what extent NGO networks, under differing conceptualizations of the problem of human trafficking, reflect nationally specific problem discourse in their own framing of the issue?

Utilizing a constructivist theoretical perspective, this research aims to answer this question via a discourse analysis of these NGO networks via published reports and website content describing their role, purpose and the subject of their work: human trafficking. This theory clarifies how societal norms impact stakeholder behaviors and the previously underestimated role of sociocultural ideologies on actual practice in international relations theory (McCourt 2016:476). The culture and discourse of a society connects policy to practice, making the ideological material, and no actor can be completely independent or immune to these contexts (Eleveld 2016:73). How these differing approaches to the crime of human trafficking are represented in the discourses of the NGOs in these states will elaborate on the perception of the problem, the

perpetrators and the victims in that environment as well as the internal cultural dynamics in that case.

This paper begins by introducing the key legislation in the cases analysed and the anti-trafficking NGO networks in each state. Then the academic relevance of the research is discussed followed by a literature review of relevant works. The theory utilized is then addressed, namely constructivism, and the methodology of Critical Discourse Analysis to examine problem framing in relation to trafficking and power relations. I then provide greater detail on the case studies of anti-trafficking NGO networks in the UK and Sweden and the pieces of legislation as a starting point to illustrate the differing framing. The content of the discourse analysis is analysed and finally the research findings are discussed.

2. Trafficking Policies and NGO Networks in The UK and Sweden

Sweden's trafficking discourse is highly influenced by a 1999 law criminalising the buying of sex which, while not explicitly targeting trafficking, is inseparable from any discussion of trafficking in the country (Erikson & Larsson 2020:185); specific trafficking legislation was not passed until 2004. The 'Swedish Platform Civil Society against Trafficking in Human Beings' (CSTHB)¹ was established in 2013, well after the highly influential legislation was enacted. Sweden has placed more emphasis on sex-trafficking in their key policy actions. Sweden is known for introducing this Nordic Model which has been introduced in several other European states. In contrast, the UK Anti-Trafficking Monitoring Group (ATMG)² in the UK was formalised in 2009 six years before the UK's Modern Slavery Act (MSA) was implemented. The 2015 MSA made

¹ <https://manniskohandel.se/>

² <https://www.antislavery.org/what-we-do/uk/anti-trafficking-monitoring-group/>

great strides in changing the approach to the crime, to perpetrators and especially to victims (Sands 2019:433). The Act clarified existing trafficking offenses and criminal charges, created an independent Anti-Slavery Commission, developed mechanisms for confiscating trafficker's assets, and other components. Forced labor and migration are central to the UK bill as adjacent and interrelated elements of human trafficking.

NGO networks, like the ATMG and CSTHB, have to react to the environment they exist within, including the legal parameters set by government, and while NGOs often are the voices driving governments to address an issue or change their approach, they still have to respond to the status quo and are thus influenced by the widely held perceptions and discourses of the problem (Broad & Turnbull 2018). Though NGOs are certainly highly proactive, this analysis examines their more reactive function and role representing the sociocultural view of the problem in their sphere. Like any group or citizen, they must operate within the bounds defined by the norms, laws and policies of their environment (Lilyblad 2019). Neither piece of legislation is solely focused on human trafficking, but culturally and politically each is inextricably linked to that issue. This study seeks to analyze how these differing framings are represented through the problem discourse and framing by NGO networks.

3. Academic Relevance

NGOs and the civil society as a whole are coming to greater prominence and given more responsibilities today as problems expand beyond the scope and borders of a single nation. Understanding the role of these NGO networks in perpetuating or countering the narrative of trafficking promoted by the state in their discourse is key to clarifying their ideological relationship with dominant actors and powerful interests.

How a problem is framed affects the perceptions and behavior of the stakeholders tasked with combating the problem. The efficacy of any measures to address human trafficking will be affected by the way the problem is perceived since this decides who is and isn't a victim, the circumstances of the crime, the process, aftermath and so on. If it can be understood how a model of trafficking, how a particular emphasized element affects the national approach as a whole, we can understand how these different approaches produce dramatically varying outcomes in pursuit of the anti-trafficking goals of prevention, protection and prosecution. Comparative human trafficking discourse analysis can also crucially reveal the special interests and power dynamics of the state based on what facets of an issue they emphasize and which they seek to mask.

4. Literature Review

The framing and discursive presentation of various sociopolitical issues, and trafficking in particular, by various stakeholders has been well studied (O'Brien 2016; Sharapov 2017). Of particular relevance is Bacchi's 'what is the problem represented to be?' (WPR) framework for policy study, which examines the way the problem is represented and what this framing includes and excludes (Bacchi 2012). Sharapov's study of anti-trafficking policy in the UK, "demonstrates how governing through specific problematizations has detrimental effects that can be uncovered and challenged" (Sharapov 2017:91). The version of the problem put forward will influence and produce corresponding solutions and discourse; each version of which comes with its own political implications (Ausserer 2008:96; Meriläinen & Vos 2015:15). This discourse

represents an ideology by perpetuating a specific vision of the subject, “sustaining particular relations of power and domination” (Fairclough 2001:7).

Literature has examined the link between the way a problem is presented and hegemonic power and the perpetuation of norms presented as fixed rather than flexible and changeable (Jørgensen & Phillips 2002:4). Laclau and Mouffe (1985) “conceptualise how reality comes to appear to be natural and non-contingent,” but is articulated by actors in power with an interest in perpetuating these discourses (Jørgensen & Phillips 2002:10). In relation to trafficking in particular, approaches to all aspects of the crime from the act itself and the push/pull factors behind it to victim identification and prosecutions are based in dramatically different perceptions of human trafficking (Watt & Westhuizen 2017:220; Matos et al. 2017:393). Given that trafficking is a process crime not a single event (Watt & Westhuizen 2017:219), it inevitably overlaps with the discourse of other politicized issues.

Research has been conducted examining how the issues or policy fields frequently associated with trafficking affects trafficking discourse, since different environments have different presentations and combinations of these variables approached in different ways by stakeholders (Meriläinen & Vos 2015:15-20; Chaney 2017:13). Gleason has identified six major discourse strands in addressing human trafficking: immigration, labor, sex, gender, children, and consent (et al. 2018:306) which are combined in different ways based on normative interests. In addition to these topical threads, specific linkages connect human trafficking to unemployment, poverty, discrimination, inadequate access to education and medical services, domestic violence and migration policies (Friesendorf 2007:394). The last of which is particularly dominant

in this issue area, as Ausserer and others have linked hostile immigration policies to anti-trafficking discourse in a number of prominent political spheres (Ausserer 2008; Bucken-Knapp et al. 2012:168); perpetrators are presented as evil foreigners abusing young innocent women, to make the issue a humanitarian one and justify harsher border controls and hostility towards certain migrant groups. The effects of this increasing overlap has been studied on the EU level but there is limited study of anti-trafficking policies and issue linkage discourses within individual EU member states (Bucken-Knapp et al. 2012:168). Gadd and Broad have said these narratives and highly publicised accounts of trafficking busts and victim rescues by police serve to reinforce this state discourse and absolve them of, “responsibility for the things they do have control over: the feminization of poverty and its relation to women’s migration; the criminalization of sex workers; immigration controls, indebtedness, welfare regulation and the impoverishment of those denied citizenship (Gadd & Broad 2018:1452). The framing of trafficking in a specific country or environment will see certain elements of this narrative gaining higher prominence than others, therefore studying their permeation into society beyond the state itself is highly relevant.

NGOs do much of the anti-trafficking work on the ground, serving as a frequent first point of contact for many victims, therefore warranting study in research on human trafficking narratives. Numerous studies have elaborated on the role of these groups as the front line of anti-trafficking work as they, “identify trafficked persons; establish hotlines; provide trafficked persons with safe housing, legal and professional advice, medical assistance, and psychological support” (Friesendorf 2007:388). Cooperative civil society structures like NGO networks have increased in prominence and have been

studied both as a form of governance and for their information production function. Even more specifically, advocacy networks have been examined with an emphasis on their internal structures, externally produced materials and influences and relationship with other entities including the state (Acosta 2008:1;Friesendorf 2007:385).

Regardless of the group's function or perspective, NGOs still have to function in and respond to a larger domestic framework established by policy; their agency is constrained by the, "contemporaneous structure of the international or global system within which they operate" (Lilyblad 2019:116). Government maintains hegemonic power in shaping domestic discourses of trafficking although non-state actors have an increasing degree of involvement and visibility. Despite greater impact, the agency of NGOs continues to be, "temporally and historically contingent on the prevailing macro-level systemic context" (Lilyblad 2019:115) and the larger narrative remains a normative one reflecting hierarchical power relations (Broad & Turnbull 2018:121). Lilyblad addresses the argument that many NGOs, "remain dependent on and subject to public hierarchical steering within the state's shadow of hierarchy...[serving as] agents of systemic reproduction, preserving the architecture of the contemporary global system as well as their position within it" (2019:122). Following this line of thought through a lens of constructivism, NGOs reflect common discourses perpetuated by the state that constructed a perception of the reality of the human trafficking problem (Lilyblad 2019:124).

5. Theoretical Framework

Constructivist theory is useful in elaborating on the relationship between an emphasized policy issue within a platform and the actors who carry out practical

implementation representing a larger ideology. The theory examines, “how ideational factors (worldviews, ideas, collective understandings, norms, values, cognitive schemes, etc.) dominate political action” (Saurugger 2013:888). Policy communicates these state ideas which are then implemented and interpreted by stakeholders outside government.

Constructivism engages with a, “scholarship sensitive to the social, historical, and context-dependent nature of action in international politics” (McCourt 2016:476). Sociocultural worldviews will influence public policy making and implementation in different states which are outwardly relatively similar or express the same dedication to an issue. Since the formulation of a policy is so dependent on the perception of the problem, constructivism highlights a self-fulfilling prophecy of problem-targeting policy creating a framing of the problem that reinforces that dominating narrative in a perpetual cycle between the government and the governed. “In other words, the way we think about the world makes the world as we perceive it” (Saurugger 2013:890).

Constructivism is also useful in the analysis of what is absent in legislation or discussion of a problem, reflecting what isn't in the interests of powerful stakeholders (Hopf 1998:176). Norms, culture and ideology all reflect concepts of power and hegemonic dominance that creates an ideological worldview.

In the trafficking policies discussed here, nation states pass the legislation and oversee enforcement of the law but NGOs and non-state actors see the majority of the day to day realities of human trafficking. With increasing impact and reach “civil society frames issues, helps set agendas, and mobilizes publics” (Finnemore & Sikkink 2001:400). It remains undeniable however, that state identity shapes the preferences,

behaviors and policies of that nation enacted by legislators (ibid:398). The state's ideological preferences will impact the non-state actors in their pursuit of the problem and proposed solutions grounded in the original policy.

6. Methodology

This research uses differing emphasized elements of trafficking represented in national legislation as a starting point to analyse how NGO networks reflect these framings of the issue. Policy is both, "a practice of power and a contested cultural resource" (Mattheis 2017:58). Critical Discourse Analysis (CDA) can then link the policy to larger ideas and the communication of cultural and political views into practice outside government. The CDA utilized here, led by Fairclough and Wodak, defines discourse as ideological, interpretive, explanatory and representative of society, culture, and power. This method examines the way power and hegemonic norms are, "enacted, reproduced, and resisted by text and talk in the social and political context" (Scollon 2001:2; Van Dijk 2005). Constructivism holds that interpretations construct social reality and, alongside CDA, can help explain varying discourses and perceptions of the problem of human trafficking in different sociopolitical contexts.

Being aware of the hegemonic discourse and examining the way that framing relates to the discourse of NGOs reveals how that power influences perception of the problem of trafficking in the larger society. The state has certain interests separate from any concern for victims of trafficking, such as migration and prostitution policies which are tied to trafficking legislation. Policy is the practice of the ideology of governing powers who, in developing law, create a version of the problem by presenting it a certain way; by proposing certain solutions they imply certain causes.

NGOs are the primary units of this discourse analysis as they can provide more direct accounts of experience with trafficking victims and have to respond to the status quo and general structures of their environment shaped by policy (Pal 1995:203). Though NGOs both influence and are influenced by the discourse of the government, this study examines the latter, considering how these organizations outside the direct purview of the state are affected by this power dynamic, dictated through discourse and framing (Machin & Mayr 2012:4). The discourse of NGOs may reflect the framing put forward by the government or seek to challenge these hegemonic norms and therefore the study of anti-trafficking NGO networks is benefited by a CDA approach.

Bacchi's 'What's the Problem Represented to be' (WPR) approach is also used to examine the discursive framing of human trafficking in these cases. WPR is used to examine public policy based on the premise that, "what one proposes to do about something reveals what one thinks is problematic (needs to change). Following this thinking, policies contain implicit representations of what is considered to be the 'problem' ('problem representations')" (Bacchi 2012:21). Therefore, how the problem, victims, perpetrators and circumstances of trafficking are presented in NGO discourse will reflect the influence of the hegemonic discourses perpetuated by the state. Bacchi asks, "What presuppositions or assumptions underpin this representation of the 'problem'?...What is left unproblematic in this problem representation? [and] What effects are produced by this representation of the 'problem'?" (2012:21). Policy is not a proposed solution but the produced version of the problem by powerful actors which perpetuates or excludes certain elements. Policy is, "an exercise of power" (Bacchi 2007:14), and by examining the NGO networks which deal most practically with

trafficking, a CDA approach paired with an examination of the framing and discourse provides insight into the differing presentations of human trafficking in countries with different legislative emphases.

This discourse analysis includes examination of anti-trafficking NGO network platforms, reports, and website content to study the network's norms and their framing of the problem of trafficking (Klotz & Lynch 2007:19). This research takes a constructivist perspective, focusing on discourse as the manifestation and communication of ideas (Klotz & Lynch 2007:3) and how the problem of human trafficking is framed in these different national and legislative contexts.

The sources analysed are the websites of the two anti-trafficking networks and recent publications discussing the nature of trafficking including the circumstances, victims and perpetrators. The Swedish network has an extensive website of which several subpages were analyzed. The ATMG in the UK does not have their own website but rather is hosted by a parent organization, Anti-Slavery International, therefore their extensive publications provided the majority of the analyzed content for this case. Both serve the same purpose: to describe the group, their structure, goals and functions, and to illustrate the dynamics of human trafficking in their country.

7. Case Studies: The UK & Sweden

This research was completed via a comparative case study of the anti-trafficking NGO networks in the UK and Sweden by conducting a discourse analysis of the documents and online publications from these networks. The aim is to examine how emphasizing different elements of human trafficking within the larger state or society, lead these key NGO networks to produce different discourses related to the problem

itself. NGOs interpret the law and have their own organizational ideologies, which will affect their perceptions of victims and the problem of trafficking as a whole. These organizations filter the larger discourses communicated through policy, the 'law on paper' into 'law in practice' as they engage with victims and anti-trafficking advocacy (Matos et al. 2017:317). Though there is naturally some difference that can be attributed to population demographics and sociocultural factors, a major point of difference is the issue each nation has emphasized and led with in their human trafficking legislation.

These countries were chosen for their unique and distinct perspectives and concepts about what trafficking is but also what it is not. Both the UK and Sweden have become well known for their approach or legislative model, which produce differing versions of the problem. Sweden's Nordic Model, criminalising the buying not the selling of sex, has been adopted in several other countries. The UK's approach to modern slavery, so-called to distinguish it from the Atlantic slave trade, with forced labor as an umbrella issue which includes trafficking in the UK has been held up as an example of good practice and was used in Australia to develop the Modern Slavery Bill in 2018³. New Zealand has also incorporated some of the provisions related to corporate responsibility to demonstrate fair and not exploitative practices in their supply chains (Broad & Turnbull 2018:129). The Swedish approach centers on sex-trafficking and prostitution as the primary focus of their approach while the UK approach, though of course still incorporating sex-trafficking, takes a more general perspective to trafficking as a form of slavery and forced labor. As a result of these different points of emphasis,

³<https://theconversation.com/at-last-australia-has-a-modern-slavery-act-heres-what-youll-need-to-know-107885>

different perceptions and framings of human trafficking emerge and produce varying views of victims, perpetrators and the industry and process of trafficking in general.

This comparative case study (Van Evera 1997:56), comparing evidence of trafficking discourse between cases to test constructivist theories and examine the diffusion of ideas from government policy, as a representation of the status quo or general cultural perspective, to NGO Networks in defined information sharing and cooperative structures. Although the cases are not identical with a single point of difference, the point of study is the differing perspectives and framing of the trafficking problem and the communication of those ideas beyond the government which legislates the framing through policy. The major point of difference in this study is the prominent piece of legislation either state has pushed into a frontline position, exemplifying that nation's larger perspective and thinking on the issue, in this instance criminalizing the buying of sex in Sweden and on modern slavery in the UK (Van Evera 1997:84). The comparison will provide more complete information, including what is absent from the discourse of one case which is just as valuable as what is present. Doing a single case study loses the context of how different models create perceptions and framing of the problem. How the problem of trafficking is approached in different countries (or models) produces different practices and beliefs which in turn affects the efficacy of measures to combat trafficking by determining a worldview or in this case view of the problem.

8. Legislative Influences

8.1 The Modern Slavery Act and Trafficking Policy in The UK

The UK introduced a legal offense of trafficking in 2002 via the Nationality, Immigration and Asylum Act although this offense only addressed trafficking for prostitution and was not a complete policy (Skrivankova 2007:205). The legislative approach was expanded via the 2003 Sexual Offences Act, which removed the requirement of evidence of coercion, deception or force by perpetrators in order to prove sexual exploitation, as set forward in the UN Trafficking Protocol (Skrivankova 2007:205). In 2004, all forms of trafficking were finally addressed in legislation through the Sexual Offences Act 2004 and the Immigration and Asylum Act 2004, and NGOs including Anti-Slavery International lobbied successfully for inclusion of a statute criminalising forced labor independent from human trafficking (Craig 2015:18). A more holistic platform was implemented in 2007 with the UK Action Plan on Tackling Human Trafficking which sought to implement a human rights approach, emphasizing victim support rather than just law enforcement. At this stage however, labor exploitation trafficking was still deemed not prevalent enough to be labeled as a significant problem (Skrivankova 2007:207) and remained largely absent larger trafficking discourse in the UK which remained focused on sex-trafficking and child-trafficking, in spite of an expanded definition of trafficking.

The Modern Slavery Act was implemented in 2015⁴ in England and Wales, after years of debate and revisions, while Northern Ireland and Scotland developed parallel legislation (Sands 2019:433). In part this law related to EU and ECHR, “positive

⁴ Modern Slavery Act https://www.legislation.gov.uk/ukpga/2015/30/pdfs/ukpga_20150030_en.pdf

obligations to criminalise and investigate crimes of slavery, servitude, forced and compulsory labour” (Sands 2019:433). The MSA was, “the first national legislation to use the term ‘modern slavery’ and to explicitly target ‘slavery’ as opposed to ‘human trafficking’, ‘forced labour’, or other terms” and recognised 17 types of modern slavery (Broad & Turnbull 2018:119). In the MSA it is explicitly mentioned that consent does not preclude the applicability of the law⁵, since manipulation and initial agreement leading to eventual abuses is well documented in trafficking and modern slavery research (Machura et al. 2019:202). Perpetrators are defined as, “as a person knowingly holding “another person in slavery or servitude” or knowingly requiring “another person to perform forced or compulsory labour”⁶. It provided for specialised child advocates, the confiscation of trafficker’s assets, a statutory defense for those who were compelled to commit crimes while a trafficking victim and a number of other measures (Sands 2019:433). The use of ‘Modern Slavery’ as a label for the act expands the forms of exploitation that the law applies to, regardless of whether they were geographically moved or ‘trafficked’ in common conceptions (Muraszkiewicz 2019:402). The argument in using this terminology spoke to the larger discourse that, “human trafficking, whether for sexual or labour exploitation, was the tip of a much larger modern slavery iceberg” (Craig 2015:137) and therefore should be approached as a component of this larger issue classification. More recently, evaluations have found that the MSA has not met prosecutorial standards, with very few cases being investigated or prosecuted and making limited provisions for victim protection (Sands 2019:433).

⁵ MSA (Section 1[5])

⁶ MSA (Section 1[19])

8.2 Sweden's Nordic Model and Trafficking Policy

The Kvinnofrid Law (Violence Against Women Act)⁷ contained The Prohibition of Purchasing Sexual Services Act of 1999 which banned the buying of sexual services in Sweden rather than criminalizing the seller. It described prostitution as, “a form of 'exploitation', in terms of male violence against women, and harmful to society writ large” (Carson & Edwards 2011:73). Shortly thereafter, Sweden ratified the UN Palermo Protocol in 2000, the current international standard defining human trafficking and the first measure to define human trafficking in international law as a crime in its own right independent of other offenses (UNODC 2019). In 2001 the Government appointed a special advisor on prostitution and trafficking in human beings based in the Government Division on Gender Equality, further evidence of the linked discourse of the two spheres, to shape state action and coordination going forward (Ekberg 2018:5). Sweden passed national legislation banning trafficking in 2002, revising the law in 2004 and again in 2010 (Erikson & Larsson 2020:185). The first revision expanded criminalization from a focus on sex-trafficking to include, “trafficking within national borders and for additional purposes such as forced labour, war service and exploitation for the removal of organs” (Ekberg 2018:11) to comply with the Palermo Protocol. These two policies, banning the buying of sex and trafficking in human beings continue to be linked together practically and in Swedish sociopolitical discourse (Erikson & Larsson 2019:3). It is worth noting that the law criminalizing the purchase of sex preceded the larger trafficking law by several years.

⁷ Kvinnofrid: Regeringens Proposition 1997/98:55 (In Swedish)
<https://www.regeringen.se/49bba3/contentassets/1733625e719c43b28f073fa9cdec90f2/kvinnofrid-prop.-19979855>

The once unique Nordic Model has since been adopted by other countries, including Iceland, Norway, Canada, Ireland, France and Israel. Although this policy did not explicitly target trafficking, it has been linked to it domestically and internationally as a means of reducing the demand for sexual services therefore reducing the appeal as a destination country for traffickers (Erikson & Larsson 2020:185). The success of this model is highly debated as reports from the government itself show continuously low prosecution rates and lack of information on forms of prostitution other than street prostitution such as internet-based (Zeegers & Althoff 201:363; Erikson & Larsson 2019:3). While the Nordic Model was born out of the increasing popular framing of prostitution as patriarchal oppression of women in the 1980s (Zeegers & Althoff 2015:361), it has become inextricably linked to larger discourses of trafficking and migration and continues to be a prominent policy domestically.

9. NGO Networks

9.1 Anti-Trafficking Monitoring Group

The NGO network in the UK, the Anti-Trafficking Monitoring Group (ATMG)⁸ was formalized in 2009, first established as an informal coalition in 2007, currently has 12 member organizations⁹. Chaired by one of the oldest NGOs in the UK, Anti-Slavery International formed in 1839 (Weissbrodt 2013:5), the group brings their long history as an abolitionist group to the ATMG which addresses all forms of human trafficking including forced labor under the umbrella concept of modern slavery.

⁸ <https://www.antislavery.org/what-we-do/uk/anti-trafficking-monitoring-group/>

⁹ Current ATMG Members: Anti-Slavery International, Ashiana Sheffield, Bawso, ECPAT UK, Focus on Labour Exploitation (FLEX), Helen Bamber Foundation, Kalayaan, Law Centre (NI), The Snowdrop Project, The TARA service, UNICEF UK, JustRight Scotland.

The ATMG has published a number of reports since its formation, on topics including the legal treatment of victims, uncoordinated multi-agency approaches and issues with policies addressing trafficking and supporting victims (Broad & Turnbull 2018:126). While the MSA was still being drafted in 2013, a report was published calling for, “the consolidation of pre-existing legislation pertaining to trafficking around the term ‘modern slavery’” (Gadd & Broad 2018:1446). The ATMG and other NGOs lobbied successfully for the publication of a draft of the legislation which was heavily criticised and reformulated before publication, although with limited incorporated recommendations from these groups (Craig 2015:19). The group gained status following the passage of the MSA, as modern slavery and human trafficking experienced a resurgence in political and social discourse. The ATMG called the 2015 MSA a, “hugely positive development”, but still limited in victim support and less effective than similar legislation in Scotland and Northern Ireland, requiring significant compensatory action by anti-trafficking NGOs and the ATMG in particular (EIN 2016). Even before the MSA was enacted, the ATMG was serving to compensate for legislative gaps in anti-trafficking work in the UK. The Convention on Action Against Trafficking in Human Beings¹⁰ was applied in the UK in 2009 but did not lay out a formal monitoring mechanism for victims, therefore the ATMG’s efforts to collect data and conduct research sought to make a dent in the vastly insufficient quantitative knowledge about trafficking (Lancet 2010). These reports continue to be a major contribution of the ATMG, their most recent publication is a retrospective of their work since establishing themselves as an official anti-trafficking NGO network in 2009. There is less academic study of this network than its Swedish counterpart, appearing more frequently in news

¹⁰ <https://rm.coe.int/168008371d>

media¹¹ and in references to their knowledge production functions putting out reports and providing the anti-trafficking industry in the UK with data.

9.2 Swedish Civil Society Platform Against Trafficking in Human Beings

The Swedish Network is newer than the comparable group in the UK, established in 2013 and unlike the ATMG, did not precede the key policy influencing their trafficking discourse. The Swedish Civil Society Platform Against Trafficking in Human Beings (CSTHB or The Platform)¹² was established following a 2013 evaluation from the European Council trafficking expert group GRETA and findings that their victim support services were lacking (Ekberg 2018:26). The Platform evolved from an informal effort between organizations into an official collaboration with membership criteria, values and coordinated goals in victim support and policy development (Erikson & Larsson 2020:185). CSTHB is described as a, “human rights-based, non-profit organization with the aim to combat human trafficking, and to strengthen the human rights of victims” (Ekberg 2018:26). There are currently 17 NGO members in the CSTHB¹³, which also allows for expert individual membership in addition to these groups, each of which have some direct contact and experience with victims (Erikson & Larsson 2019:9).

Member organizations continue to pursue their own agendas, though they still must in accordance with the CSTHB’s values, and address varying aspects of a victim’s needs including housing, psychological and medical care, and legal advice (Erikson &

¹¹<https://www.independent.co.uk/news/uk/home-news/home-office-u-turn-financial-support-modern-slavery-trafficking-coronavirus-a9695266.html>

¹² <https://manniskohandel.se/>

¹³ Current CSTHB Members: Noomi, Hela Människan i Malmö, Göteborgs Räddningsmission, Realstars IF, ECPAT Sweden, The Salvation Army, Safe-Care, Talita, Erikshjälpen, Caritas Sweden, IMT Insamlingsstiftelsen mot, Hela Människan Sweden, Swedish Red Cross, Stiftelsen Unga Kvinnors Värn, Föreningen Hjälp till Behövande, Unizon, Qjouren, Child 10.

Larsson 2020:185). The membership is diverse, including radical feminist organizations as well as faith-based or religious groups, all working under the “victims-first” goals (Erikson & Larsson 2020:193). A crucial criterion for exclusion however, are any groups that support or recognize sex work as a legitimate or chosen form of labor. The CSTHB shares the national abolitionist view of prostitution and supports the Nordic Model of client criminalization, seeing all women in this situation as exploited; the Platform’s Coordinator states these values are a necessary condition for their close relations with public authorities (Erikson & Larsson 2019:9). So while the goal of victim support at the heart of the CSTHB is enough to bring together groups with highly varying interests, those that support a pro-sex-work position are not allowed to become full members and thus there is a definitive divide which excludes groups of alternative perspectives (Erikson & Larsson 2020:193).

The CSTHB was directly involved in the development and practicalities of the National Referral Mechanism (NRM) and the National Support Program (NSP), also the result of GRETA finding a lack of civil society collaboration in Sweden (Erikson & Larsson 2020:196); despite their high involvement in public anti-trafficking efforts does not rely on public funding (Erikson & Larsson 2020:185). They do collaborate closely with the National Task Force against Prostitution and Human Trafficking (NMT) and thus information and ideologies will crossover between the governmental and non-governmental organizations (Erikson & Larsson 2019:10).

10. Discourse Analysis of Two Anti-Trafficking NGO Networks

10.1 UK ATMG

The ATMG describes itself as, “a coalition established in 2009 to monitor the UK’s implementation of European anti-trafficking legislation. The group examines all types of human trafficking, including internal trafficking and the trafficking of British nationals” (UK1). Increasing efforts to achieve recognition for domestic trafficking is evident. It is worth noting briefly that neither this website nor the reports discussed address the membership criteria of the ATMG so although we know their roster has changed it is not clear how new members came to join the network or what led others to leave. They operate according to a human rights-based approach, prioritizing “the well-being and best interests of victims of human trafficking” (UK1). The ATMG self-identifies as playing a crucial advocacy role in improving the anti-slavery response of the UK Government (UK1), and in the reports discussed below, describes their relationship as a ‘critical friendship’ wherein they cooperate although the ATMG criticizes the Government’s actions and inadequate provisions for victims. They publish numerous reports and briefings, serving a knowledge producing function, focusing on the widely accepted three ‘Ps’ of human trafficking: “Prevention, Protection and Prosecution” (UK1). The research findings determine the ATMG’s advocacy choices, presenting them as heavily led by evidence in a field, human trafficking, with spotty and unreliable data (Goodey 2008:424). 2019 marked the network’s ten year anniversary, prompting the second retrospective report discussed wherein the ATMG continue to hold themselves up as a kind of conscience of the government and advocate for victims. The two reports discussed below were chosen for their generality to cover the largest

scope of action and information on the issue of human trafficking and modern slavery in the UK.

The first report examined is, “Before the Harm is Done: Examining the UK’s response to the prevention of trafficking” published in 2018 (UK2). The report is extensive, reviewing action in the UK since 2012, “relating to the prevention of human trafficking, in order to assess the extent to which it contributes to the UK’s implementation of the 2005 Council of Europe Trafficking Convention and the EU Trafficking Directive requirements” (UK2:4). Of primary interest are the sections that describe, according to the ATMG, what human trafficking is, the circumstances and actors involved and the conceptual overlap with modern slavery, all of which allows for the examination of trafficking framing and discourse.

Overall, despite significant developments made in the UK, these, “examples of good practice do not represent the overall situation” (UK2:4). This mixed assessment is consistent with the tone throughout, acknowledging improvements but critical of government practice given that trafficking, “is often seen through the prism and policies of immigration and crime, hindering effective action” (UK2:4). In addition to immigration, wider austerity policies and Brexit pose further threats to anti-trafficking efforts and are thematically intertwined in the framing of UK trafficking throughout. The term ‘modern slavery’ and its emergence in UK trafficking discourse is noted explicitly. “Until 2013, UK law and policy used the terminology of “human trafficking” and to a lesser extent “forced labour” and “contemporary slavery”. Since 2013, the term “modern slavery” has become more prominent and, from 2015, it is referred to by the UK Government as “an umbrella term that covers the offences of human trafficking, slavery, servitude and forced labour”

(UK2:10). This new and dominating framing of these issues did not come from advocates like the ATMG but from the State which has produced some concern among NGO stakeholders for its vagueness and the obvious historical connotations (UK2:10). They therefore continue to use 'human trafficking' in step with international law while using 'modern slavery' in reference to the UK policies and legislation (UK2:10). The ATMG maintained their previous approach to human trafficking regardless of new expanded terminology, remaining more closely aligned with the framing and definition put forward by the Palermo Protocol. The process of trafficking includes three separate but interrelated elements:

1. Acts: recruitment, transportation, transfer, harbouring or receipt of persons;
2. Means: the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person;
3. Purpose: exploitation, at minimum but not limited to prostitution or other forms of sexual exploitation, forced or bonded labour, slavery or practices similar to slavery, servitude, or exploitation of children for criminal activity. (UK2:10)

The exception to this is the trafficking of children, which does not include the second stage. Human trafficking is defined here as, "the process of bringing an individual into a situation of exploitation. Individuals do not have to be transported across borders for trafficking to take place" (UK2:10). The latter being a key point and one less commonly known in common trafficking discourse as the image is still one of foreigners brought into the country. This image produces blindness to internal exploitation and in particular, forced labor exploiting. The ATMG explicitly addresses how this framing affects the proposed solutions and responses (UK2:10). The framing in the UK, and many other

states, still sees victims only in terms of, “their movement and rarely from the perspective of exploitation or, in particular, the abuse of a position of vulnerability” (UK2:10).

In detailing the causes of trafficking, the ATMG maintains, “trafficking is caused by individual and structural factors that increase the vulnerability of a person or a group to exploitation. While poverty is often cited as a chief cause, this interpretation is simplistic” (UK2:11). Larger systemic issues related to employment and migration policies and international relations approaches, “are insufficient to protect the human rights and workers’ rights of men, women and children, and therefore make them vulnerable” (UK2:11). The issue being one of workers’ rights and exploitative practices rather than traditional discourses in trafficking laws related to immigration and border policy. They identify several push factors, or reasons to leave, including: “poverty, human rights abuses, lack of social or economic opportunity and dangers from conflict or instability. Instability caused by political and civil unrest, internal armed conflict and natural disasters can lead to displacement and increased vulnerability to exploitation” (UK2:11); this shifts the focus from destination to source countries. They maintain however, that the UK’s hostile immigration policies, which make it more difficult for people to come into the country, increases the risk of the exploitation and trafficking of individuals seeking work. In terms of vulnerable populations, ATMG emphasizes, “structural violence against women and girls, who are disproportionately more affected than men” (UK2:11). This has been disputed however, as forced labor increases in prominence in the framing of trafficking and exploitation, it is unknown how many male victims remain unseen or do not come forward due to these dominant narratives of

trafficked foreign women as the typical victim and cultural conceptions of masculinity incompatible with victimhood.

The second report and most recent ATMG publication in 2019, “Real people, real lives: Ten years of advocacy for victims of slavery in the UK” (UK3) is a larger overview, more focused on the actions of the organization and its aims. They emphasize the importance of monitoring, research and data collection in anti-trafficking efforts which are knowledge production functions the ATMG serves in the UK (UK3:6). There is increasing use of ‘modern slavery’ as a state of exploitation rather than just in reference to the MSA, in contrast to the terminological clarification in the prior report.

Corporations, workplaces and labor supply chains are put forward as a prime focus in legislation and ATMG discourse as unethical business practices and a lack of accountability lead to exploitative or forced labor when unchecked (UK3:24). They lay out a spectrum of exploitation, ranging from decent work to forced labor (UK3:23), again shifting focus to the modern slavery concept and therefore the solutions to the problem being labor laws and corporate practice for example.

This report also provides a number of case studies throughout, likely included with the aim of putting a human story on the abstract policies and practices discussed.

The demographics and basic details of these case studies are as follows:

1. Female, Nigerian, sent to England at 15 as a domestic worker, sexually assaulted and beaten, eventually ran away, pregnant, found by police and sent to detention center because asylum claim was rejected, trafficking organization provided aid and support (UK3:15).
2. Four teenage females, trafficked from Vietnam, forced to work in nail bars across England, worked without wages, two were found on multi-agency welfare visit, later went missing from care, two women and a man were sentenced for modern slavery offenses related to this case in 2018 (UK3:17).

3. Female, age 14, trafficked from West Africa, trapped in domestic servitude for two years, escaped and placed in accommodation with little support, met older man who became controlling and violent, became pregnant and child was put on protection register, she felt judged by social workers for being in a violent relationship, received little support, finally was referred to ATMG member ECPAT UK and received support and life skills assistance (UK3:18).
4. Female, survivor of trafficking supported by Praxis, financial aid support was cut, unable to buy basic necessities, heightened risk of being forced back to traffickers because she needed money, financial aid was reinstated, safety and independence was restored (UK3:20).
5. Female, Albanian, trafficked for social exploitation in the UK, now has a young child and is trying to rebuild life (UK3:21).
6. Male, Vietnamese, trafficked to the UK and locked in cannabis cultivation, forced labor, abused by captors, struggles with trauma (UK3:21).

Of these case study examples, only one was male, and all but one were initially trafficked into work or exploitative labor though many were sexually or violently assaulted during the initial form of exploitation or false promise of work. This correlates with the promotion of the modern slavery framing of trafficking and exploitation. Modern slavery is linked with forced labor which has connections to labor regulations and accountability rather than framing the problem as human trafficking which has connotation of movement and migration. While the ATMG report certainly highlights how many victims are treated as immigrants first and victims second (UK3:17), and rightly attributes many of these issues to hostile government policies, the absorption of the modern slavery narrative suggests corporate or business responsibility is an increasingly prominent problem narrative. Both are valid, but the framing of trafficking in the latter generalizes the crime and changes the focus of criticism from government and state policy alone to a number of actors expanding the scope of responsibility.

10.2 Sweden CSTHB

The Swedish NGO network has a far more extensive website with information on their mission, membership, and their narratives of trafficking. They also produce annual statistical reports from their members on the demographics and experiences of victims encountered in the past year. The Platform or CSTHB is, “a human rights-based non-profit organization focusing on combatting human trafficking and to restore the dignity of victims of trafficking and further to work for strengthen human rights for victims” (SE1). The membership and criteria for the CSTHB is discussed in detail, primarily relating to the values that must be shared by prospective members (SE2;SE4). These values include the belief that prostitution is a form of exploitation and is linked to human trafficking (SE2). They aim to, “ensure that victims of all forms of human trafficking and human trafficking-like exploitation and prostitution have access to their human rights and that human trafficking is counteracted and prevented” (SE2). Therefore, NGOs supporting sex-workers are not granted full membership and, though they claim to be non-religious, this stance increases the appeal of the platform to religious groups.

The CSTHB provides victim assistance and encounters more victims than the police as many are afraid of going to the authorities. Those that do not go to the police and file a report however, do not receive official ‘victim’ status from the Swedish government and therefore do not receive certain services beyond NGO assistance (SE1). The CSTHB collects and publishes information on these first contact interactions to help fill in data collection gaps, illuminate trends in trafficking and identify the unique needs of differing victim groups (SE1).

The Palermo Protocol¹⁴ definition of trafficking is used by the CSTHB to describe the complex chain of events that make up trafficking (SE5). Trafficking may include, “several different forms of exploitation [including for] sexual purposes, forced labor, begging, slavery and organ donation” and involves exploitation under the perpetrator’s coercion or control (SE5). They maintain trafficking remains prolific because, “there are so many poor people with few alternatives and little access to rights and security” and, “there are profits to be made at little risk to human traffickers” (SE5). Frequently victims come from limited socioeconomic circumstances or are seeking a way out of poverty, making them vulnerable to exploitation (SE5). Internal trafficking and exploitation occurs as well. An individual abroad may choose to enter into ‘human smuggling’, trying to get into another country but unable to gain legal access, and end up in debt or exploitative circumstances that lead to trafficking (SE5). Given their emphasis on sex-trafficking and prostitution, trafficking continues because there is still high demand despite the Nordic Model making buying sexual services illegal; the success of this Model is highly debated.

The CSTHB provides a selection of case studies, or a sampling of victims, in a section entitled “100 Women We Met” (SE6). They chose, “to present here information about 100 vulnerable women and girls civil society has had contact with - as well as information about their total of 80 children” (SE6). 11 of the 100 are girls, between 15 and 18; how many are under 15 is unclear. It is noteworthy that they only discuss female victims, not a mix, not a proportional blend along the known female-male ratio of trafficking victims, but women and girls only. Further narrowing the picture of human trafficking being portrayed, 98 of the 100 women discussed were trafficked for sexual

¹⁴ <https://www.ohchr.org/Documents/ProfessionalInterest/ProtocolonTrafficking.pdf>

exploitation. A third of those also experienced other forms of exploitation such as forced labor, begging or forced criminal acts (SE6). The focus is firmly on female sex-trafficking throughout the CSTHB discourse and all other forms of trafficking seem almost entirely secondary.

Just over half of these victims sought aid from a member of the civil society rather than the authorities, and only a few of these make police reports (SE6). Fear of harm to family by perpetrators in the home country are repeatedly mentioned as a barrier to victim outreach and involvement with any legal proceedings (SE6). In just over half of these 100 cases, there was a relationship between the victim and perpetrator, whether they are, “family members, relatives, acquaintances, come from the same place or network” or are in a dependent relationship with the perpetrator (SE6). Family is also included as a factor increasing vulnerability, as, “many women end up in human trafficking and prostitution when they try to support their family and household”; They are drawn in by false promises of work and caught in traps set by traffickers (SE6). In this framing, even if individuals choose sex work, which the CSTHB does not recognize, they are still being exploited and consent is irrelevant. A number of factors further increase vulnerability: lack of documentation or identification, immigration status, money, not knowing the language, literacy, mental disabilities, belonging to a minority group, and experiencing abuse or violence early in life (SE6). The case studies provided are clearly portraying a specific vision of trafficking victims: the young foreign female exploited in sex-trafficking.

11. Findings and Discussion of Research

Both networks, though non-governmental, remain highly influenced by the specific domestic hegemonic discourse supported by state discourse. Promotion of a forced labor narrative through the framing of modern slavery in the UK and the almost complete focus on female sex-trafficking overlapping with prostitution discourse in Sweden, shows the prolific impact of dominant government framings on the discourse of NGOs. A key difference between the two networks and their reflection of hegemonic discourse is that of inclusive terminology versus exclusive membership. One expands the concept of trafficking and the other limits the discourse to conform with the dominant narrative by only admitting groups in line with those norms. Though technically separate from the government, these two networks reflect and largely maintain the hegemonic framing of the problem and the resulting policy solutions to the crime of human trafficking.

The discourses are manipulated into different framings of human trafficking based on which of the associated issues, like migration, prostitution and gender, are emphasized into varying, “discursive knots” producing specific narratives with varying solutions (Gleason et al. 2018:300). At each discursive intersection, different perspectives on the process of trafficking and the victims produce different attributions of responsibility and redirects focus. Certain interests are served by these different discursive framings and are used to distract from or justify certain policies. Rather than dealing with social welfare, immigration policies, weak workers rights and other structural weaknesses the state emphasizes public awareness campaigns; though important these are surface-level short term solutions. The alternative is to take

responsibility for harmful policies and for creating an environment that is favorable to, fosters or facilitates trafficking largely by increasing the vulnerability and decreasing the options available to victims. The policies, initiatives and larger social shifts required to effectively address these foundations of common variables in trafficking, would require long-term financial investment and fundamental shifts in that society and their economic and political approaches to trafficking.

The discursive themes that were utilized in different combinations and to varying degrees in the framings discussed here include a number of points or binaries. Among these are gender, immigration, otherness, prostitution/sex work, consent/agency, poverty, corporate responsibility/supply chain ethics and legitimate/exploitative labor. It is difficult to neatly separate or classify these different discursive themes to analyze individually as this issue and the trafficked individuals are highly intersectional in their identities or relevant categorizations. Which topics are highlighted in each case is therefore examined more so than individual thematic comparison across cases. This has revealed particular 'knots' which vary in their presentation, degree of emphasis and sociopolitical context.

The exclusion of organizations based on their opposition to the values of the CSTHB, namely those which support sex work or do not categorize all prostitution as exploitation shows a narrowing of the framing of trafficking and a specific narrative at the expense of other issue framings. "The normative divide concerning prostitution is apparently too great to permit full cooperation with organizations that support sex work" (Erikson & Larsson 2020:193,194). The narrative entrenched in law by the 1999 policy effectively banning prostitution by targeting the buyers rather than the sellers of sex, has

evidently influenced the discourse of the CSTHB even down to their membership criteria. There is a reflection of the government's discourse, creating a power imbalance between the groups included in this dominant civil society structure versus those excluded which would challenge or expand their approach to trafficking and their discourse of trafficked women in particular.

The UK ATMG remains far more directly critical of the government and specific policy rather than more general issues discussed in the Swedish case. Their terminological approach is inconsistent, in the first report they separate and clarify the terms but seem to use them more interchangeably in their most recent publication; the long term benefits or harms of this kind of terminological expansion on anti-trafficking efforts remains to be seen. The ATMG may have some advantage in their framing capacity, as they predate the MSA by several years while the Nordic Model was well established in the trafficking discourse by the time the CSTHB was created.

From the theoretical basis of constructivism, the problem of human trafficking for societal and political spheres is a constructed one. That is human trafficking is of course not an imagined occurrence but meaning that the form and practice are not objectively consistent across all cases, nations, etcetera. The problem is not one with an objective form and universal presentation. Stakeholders in positions of power, typically government but also wealthy corporate interests, can take advantage of the narrative's malleability to use the issue of trafficking to mask, tie in or address a number of other issues; when the data available is as inadequate and inconsistent as it is with human trafficking, the nature of the problem is whatever the hegemonic narrative says it is.

12. Conclusion

The two anti-trafficking NGO networks compared here present different reflections of discourse on human trafficking relative to the hegemonic powers in their environment. The Swedish CSTHB reflects the country's Nordic Model of prostitution, banning the purchase of sexual services, focusing almost entirely on female sex-trafficking and including any kind of sex work as a form of exploitation. The ATMG has some advantage since it was well established before the law that dominates UK anti-trafficking discourse, the MSA, was introduced and remains more critical of government practice than their Swedish counterpart. By focusing on sex-trafficking in the former case and forced labor or general exploitation in the latter, these NGO networks reflect the framing of the issue in their country and the intertwined issues of immigration and prostitution which are intertwined with trafficking discourse. Trafficking as an organized crime problem, for example, rather than one fostered by economic inequality, demand for cheap labor, and hostility to migrants implies a law enforcement solution rather than grand structural and systemic change.

Although largely considered to be the conscience of the state, pushing for more progressive policies and practices, this constructivist discourse analysis highlights the extent to which NGOs and NGO networks remain influenced by the framing of the problem of human trafficking by powerful state interests. This influence beyond the purview of government only serves to perpetuate and reinforce existing norms favored by hegemonic powers. While NGOs are by definition distinctly separate entities from government and therefore not under their direct control, NGO discourse and perception of the problem of human trafficking remains highly dependent on the state's framing.

References

- Acosta, R. (2008). "The fluid market of advocacy network research" The International Society for Third-Sector Research. Working Paper Series Volume VI.
- Ausserer, C. (2008). 'Control in the Name of Protection': A Critical Analysis of the Discourse of International Human Trafficking as a Form of Forced Migration. *St Antony's International Review*. 4. 96-114.
- Bacchi, C. (2007). The Ethics of Problem Representation: Widening the Scope of Ethical Debate, *Policy and Society*, 26:3, 5-20.
- Bacchi, C. (2012). Introducing the 'What's the Problem Represented to be?' approach. *Engaging with Carol Bacchi : Strategic interventions and exchanges*. University of Adelaide Press.
- Broad, R. & Turnbull, N. (2018). From Human Trafficking to Modern Slavery: The Development of Anti-Trafficking Policy in the UK. *European Journal on Criminal Policy and Research*, 25(2), 119-133.
- Bucken-Knapp, G., Schaffer, J. & Strömbäck, K. (2012). Security, Equality, and the Clash of Ideas: Sweden's Evolving Anti-Trafficking Policy. *Human Rights Review*, June 2012, Volume 13, Issue 2, pp 167-185.
- Chaney, P. (2017) Comparative analysis of state and civil society discourse on the implementation of the United Nations' convention on the rights of the child in North Africa, *The Journal of North African Studies*, 22:1, 6-3.
- Craig, G. (2015). Human Trafficking and the UK Modern Slavery Bill. *Social Inclusion*, 3(1), 136-139.
- EIN. (2016). Recent reports examine the UK's efforts to tackle human trafficking and slavery. <https://www.ein.org.uk/news/recent-reports-examine-uks-efforts-tackle-human-trafficking-and-slavery>.
- Ekberg, G. (2018). Swedish Laws, Policies and Interventions on Prostitution and Trafficking in Human Beings: A Comprehensive Overview.
- Eleveld, A. (2016). The Role of Ideas in Policy and Institutional Change: A Comparison of the Open Functional Approach, Constructivism and Discourse Theory. *Political Studies*, 64, 70-87.

Erikson, J. & Larsson, O. (2019). Beyond client criminalization: Analyzing collaborative governance arrangements for combatting prostitution and trafficking in Sweden. *Regulation & Governance*.

Erikson, J. & Larsson, O. (2020). How platforms facilitate collaboration across organizational boundaries: fighting human trafficking in Sweden. *Policy Sciences*.

Fairclough, N. (2001). Critical discourse analysis as a method in social scientific research. In Wodak, R., & Meyer, M. *Introducing Qualitative Methods: Methods of critical discourse analysis* (pp. 121-138). SAGE Publications, Ltd.

Finnemore, M. & Sikkink, K. (2001). Taking Stock: The Constructivist Research Program in International Relations and Comparative Politics. *Annual Review of Political Science*, 391-416.

Friesendorf, C. (2007). Pathologies of Security Governance: Efforts Against Human Trafficking in Europe. *Security Dialogue*, 38(3), 379-402.

Gadd, D. & Broad, R. (2018). Troubling recognitions in British responses to modern slavery, *The British Journal of Criminology*, Volume 58, Issue 6, November 2018, Pages 1440–1461.

Gleason, K., Baker, C. & Maynard A. (2018). Discursive context and language as action: A demonstration using critical discourse analysis to examine discussions about human trafficking in Hawai'i. *J Community Psychol*. 46:293–310.

Hopf, T. (1998). The Promise of Constructivism in International Relations Theory. *International Security*, 23(1), 171-200.

Klotz, A. & Lynch, C. (2007) *International relations in a constructed world*. 2nd ed. Abingdon: Routledge. Chapter 1, 3-23.

Laclau, E. & Mouffe, C. (1985). *Hegemony and socialist strategy*. London: Verso.

Lancet. (2010). Protecting people who have been trafficked. Volume 375, Issue 9733, p2194.

Lilyblad, C. (2019). NGOs in constructivist international relations theory. In *Routledge Handbook of NGOs and International Relations* (1st ed., pp. 113-127). Routledge.

Matos, M., Gonçalves, M. & Maia, A. (2017). Human trafficking and criminal proceedings in Portugal: Discourses of professionals in the justice system. *Trends in Organized Crime*, 21(4), 370-400.

Mattheis, A. (2017) A mashup of policy tools and CDA as a framework for educational policy inquiry, *Critical Policy Studies*, 11:1, 57-78.

McCourt, D. (2016). Practice Theory and Relationalism as the New Constructivism. *International Studies Quarterly*, 60(3), 475-485.

Meriläinen, N. & Vos, M. (2015). Public Discourse on Human Trafficking in International Issue Arenas. *Societies* (Basel, Switzerland), 5(1), 14-42.

O'Brien, E. (2016). Human Trafficking Heroes and Villains. *Social & Legal Studies*, 25(2), 205-224.

Pal, L. (1995) Competing paradigms in policy discourse: The case of international human rights. *Policy Sci* 28, 185–207.

Saurugger, S. (2013). Constructivism and public policy approaches in the EU: from ideas to power games, *Journal of European Public Policy*, 20:6, 888-906.

Scollon, R. (2001) Action and Text: Towards An Integrated Understanding of the Place of Text in Social (Inter)Action, Mediated Discourse Analysis and the Problem of Social Action. In: *Methods of Critical Discourse Analysis*.

SE1: English: Swedish Platform Civil Society against Human Trafficking.
<https://manniskohandel.se/english/>

SE2: Values. <https://manniskohandel.se/var-verksamhet/mal-och-vardegrund/>

SE4: Membership. <https://manniskohandel.se/var-verksamhet/medlemskap/>

SE5: What is Human Trafficking?
<https://manniskohandel.se/manniskohandel/vad-ar-manniskohandel/>

SE6: One Hundred Women We Met.
<https://manniskohandel.se/manniskohandel/roster-fran-utsatta/>

Sharapov, K. (2017). 'Traffickers and Their Victims': Anti-Trafficking Policy in the United Kingdom. *Critical Sociology*, 43(1), 91-111.

UK1: ATMG Website
<https://www.antislavery.org/what-we-do/uk/anti-trafficking-monitoring-group/>

UK2: Before the Harm is Done: Examining the UK's response to the prevention of trafficking (2018)
<http://www.antislavery.org/wp-content/uploads/2018/09/Before-the-Harm-is-Done-report.pdf>

UK3: Real people, real lives: Ten years of advocacy for victims of slavery in the UK (2019)

<https://www.antislavery.org/wp-content/uploads/2019/09/Real-people-real-lives-ATMG-report-1.pdf>

UNODC. (2019). Issue paper: The International Legal Definition of Trafficking in Persons: Consolidation of research findings and reflection on issues raised.

Van Dijk, T. (2005). Critical Discourse Analysis. In *The Handbook of Discourse Analysis* (eds D. Schiffrin, D. Tannen and H.E. Hamilton).

Van Evera, S. (1997) What Are Case Studies? How Should They Be Performed?. *Guide to Methods for Students of Political Science*. 49-88.

Watt, M. & Westhuizen, A. (2017). (Re)configuring the criminal justice response to human trafficking: a complex-systems perspective, *Police Practice and Research*, 18:3, 218-229.

Zeegers, N. & Althoff, M. (2015). Regulating Human Trafficking by Prostitution Policy? *European Journal of Comparative Law and Governance*, 2(4), 351-378.

Appendix 1: Acronyms

ATMG - Anti-Trafficking Monitoring Group

CDA - Critical Discourse Analysis

CSTHB - Swedish Platform Civil Society against Trafficking in Human Beings

ECHR - European Convention on Human Rights

MSA - Modern Slavery Act

NGO - Non-Governmental Organization

UK - United Kingdom

WPR - 'What's the Problem Represented to be?' Framework

Appendix 2: Source Documents

UK

1. ATMG Website
<https://www.antislavery.org/what-we-do/uk/anti-trafficking-monitoring-group/>
2. Before the Harm is Done: Examining the UK's response to the prevention of trafficking (2018)
<http://www.antislavery.org/wp-content/uploads/2018/09/Before-the-Harm-is-Done-report.pdf>
3. Real people, real lives: Ten years of advocacy for victims of slavery in the UK (2019)
<https://www.antislavery.org/wp-content/uploads/2019/09/Real-people-real-lives-ATMG-report-1.pdf>

Sweden (SE)

Platform Swedish Civil Society against Trafficking in Human Beings Website

<https://manniskohandel.se/> (translated page titles)

1. English: Swedish Platform Civil Society against Human Trafficking
2. Values
3. National Support Program (reference only)
4. Membership
5. What is human trafficking?
6. One hundred women we met