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Response to call for input on “The use of technology in facilitating and preventing contemporary forms of slavery”

We appreciate the United Nations’ attention to this important matter, and providing an opportunity for stakeholders to provide input to inform the report of the Special Rapporteur on contemporary forms of slavery.

At Google, we believe in harnessing the power of technology to advance human rights. Through our Human Rights Program, we've developed a deeper understanding of both the opportunities and risks associated with technology and contemporary forms of slavery. We welcome the opportunity to share these insights.

This submission draws upon Google’s participation in various anti-trafficking and anti-slavery initiatives and engagement with civil society organizations, as well as our own commitments, policies, and practices aimed at eliminating slavery, servitude, forced or compulsory labor, human trafficking, and child labor associated with our supply chains, business operations, products, and services.

We have addressed a subset of questions outlined in the [call for input](#) where we feel our contribution and perspective would be most valuable.

Question 3. Are there examples of positive measures taken by technology companies to prevent their technologies and platforms from being used to facilitate contemporary forms of slavery? If so, please provide details.

Google’s approach to respecting human rights and preventing contemporary forms of slavery is grounded in internationally recognized human rights standards, including the International Bill of Human Rights and its implementing treaties, the United Nations Guiding Principles on Business and Human Rights (UNGPs) and the OECD Guidelines for Multinational Enterprises. Our company-wide work on human rights is conducted through our Human Rights Program, which advances company-wide strategy on civil and human rights, advises product teams on potential civil and human rights impacts, conducts human rights due diligence, and engages external experts and stakeholders.

Our human rights work in the supply chain is governed by our Supplier Responsibility program. Our [Supplier Code of Conduct](#) sets supplier expectations designed to protect the health, safety, and treatment of workers, including the prohibition of any form of modern slavery. In addition, our [Policy Against Modern Slavery](#) which applies to all employees, temps, vendors, and contractors, defines modern slavery, gives a concrete list of prohibited actions, and provides reporting channels for suspected instances of modern slavery. Our human rights and anti-slavery commitments are also embedded throughout our corporate policies and related content policies.

Through human rights due diligence, Google works to identify, prioritize, and address actual and potential human rights impacts. As part of this due diligence, we work with internal team members as well as expert experts and affected stakeholders to assess the ways in which our products, platforms, and services may be associated with human trafficking and contemporary forms of slavery. We also assess the risk of modern slavery in our supply chains and have expanded our audit program to identify and manage these risks.

Question 4. Are there examples of positive measures taken by technology companies to promote access to protection, justice and remedies for victims? How do they cooperate with other relevant stakeholders in this regard?

The Google Human Rights Program works to ensure Google products, business operations, and decisions related to emerging technologies are informed by human rights considerations. For example, the program advises product teams on potential human rights impacts to help prevent and avoid harms, undertakes human rights due diligence, and engages external experts and stakeholders.

Google is committed to better understanding how our products may be associated with modern slavery risks. As described in our [2021 Modern Slavery Act Statement](#), we developed search terms in partnership with a third party, to identify listings on Maps that exhibit characteristics associated with human trafficking. We then worked to both remove and prevent those listings from being displayed to users.

Beyond our own products and services, Google has helped train suppliers on modern slavery risks. For example, in 2021, we partnered with an independent third party to train suppliers on modern slavery and forced labor risks. The trainings covered indicators of modern slavery and topics such as responsible recruitment. Over 100 individuals from over 52 different suppliers attended the training. Our post-survey results demonstrated that most attendees gained a better understanding of modern slavery risks and felt better equipped to establish internal processes to identify and prevent modern slavery within their operations.

Through our membership in the [Global Business Coalition Against Human Trafficking](#), we have supported the development of resources for suppliers on modern slavery, including [GBCAT's infographic and toolkit on Addressing Forced Labor and Other Modern Slavery Risks](#). To better support survivors of modern slavery, Google also supported the development of [GBCAT's](#)

[Trauma-Informed Company Training](#) which provides people managers with practical recommendations on how to better support survivors of human trafficking in the workplace.

Google also hosts multiple reporting channels for our employees and members of our extended workforce to report concerns about modern slavery anonymously and without fear of retaliation. Additionally, Google offers a channel for users to [report concerns](#) across all of its content and platforms.

If a modern slavery concern is raised through the helpline or other reporting channels, our Anti-Modern-Slavery team is notified and coordinates with other appropriate stakeholders to investigate and address the issue. Facilitating access to reporting mechanisms is a critical way to identify risks early before they escalate in severity and to provide remedies to victims of human rights abuses.

Additionally, Google has worked with partners to develop and support anti-human trafficking tools and programs, such as the [Global Fishing Watch human trafficking program](#), the [Polaris Project's Hotline](#), and [Thorn's Spotlight](#).

Question 5. Are there examples of positive measures taken by civil society organisations and other non-governmental stakeholders in preventing modern technology from being used to facilitate contemporary forms of slavery? If so, please provide details.

Governments, the private sector, international organizations, and civil society each have a role to play in respecting and safeguarding human rights. Google participates in multi-stakeholder efforts and initiatives, such as the [Global Network Initiative](#) and the [B-Tech Project](#) to inform and evolve our approach to human rights, and supports the [Freedom Online Coalition](#), [Declaration for the Future of the Internet](#), and the [Copenhagen Pledge](#) to promote human rights frameworks and shared values globally.

Additionally Google participates in multiple collaborative initiatives to support industry innovation and the advancement of human rights in the tech sector. As a member of the [BSR Human Rights Working Group](#), Google joins business across sectors to share best practices, challenges and experiences implementing the UNGPs and further developing the field of business and human rights, including the elimination of contemporary forms of slavery. Similarly, as part of the [Responsible Business Alliance](#) (RBA), Google supports global efforts to strengthen corporate social responsibility in global supply chains. One [focus area of the RBA](#) is eradicating trafficked and forced labor in electronics industry supply chains.

As part of the [Global Business Coalition Against Human Trafficking](#), Google supports efforts to harness the power of business to prevent and reduce human trafficking and to support survivors. Additionally, as a member of [Tech Against Trafficking](#), Google supports efforts to identify and advance technology solutions that disrupt and reduce human trafficking. As an example, the [TAT Accelerator Program](#) aims to advance and scale the work of selected organizations which offer promising

technology solutions to combat contemporary forms of slavery. The 2023 Accelerator program participants include the [Issara Institute](#) and [Polaris' Nonechka Program](#). Both organizations are developing and scaling innovative tools to engage with workers that may be in situations of slavery to provide them with access to resources and remedy for labor exploitation.

Beyond participation in these initiatives, Google and Googlers (including corporate matching of employee donations, cash grants, and ad grants) have also [contributed over US\\$5.5 million](#) in 2021 to organizations fighting contemporary forms of slavery.

Question 7. What practical recommendations would you propose for Governments and technology companies to overcome these challenges?

Technology presents a myriad of opportunities to address the many contemporary forms of slavery, but capitalizing on these opportunities must be done with due regard for victims and their privacy, and with safeguards in place to prevent, avoid, and mitigate misuse or abuse of the technology.

To this end, Google refers to the [Tech Against Trafficking Written Testimony](#) submitted to the United States House Committee on Science, Space, and Technology regarding the Role of Technology in Countering Trafficking in Persons. The recommendations therein draw from the OSCE and Tech Against Trafficking paper on "[Leveraging innovation to fight trafficking in human beings: a comprehensive analysis of technology tools](#)" and highlight the role that technology can play in combatting contemporary forms of human trafficking, recognizing the various challenges around data privacy and the potential misuse of technologies.

We encourage governments to support technology solutions and policies that are grounded in evidence and to ensure that policies support the design, development, and use of sustainable and effective anti-trafficking technology solutions. This requires increased investment, adequate data standards and protections for victims, and continued robust collaboration between the public and private sectors. Only through cooperation and partnership can true progress be achieved.

Question 9. What are the existing limitations and challenges in using such technologies, and what recommendations do you have to overcome them?

Google sees the following five limitations and challenges as most pressing, and offers recommendations for each. These are also informed by the [Tech Against Trafficking Written Testimony](#).

First, while technology can have a multiplier effect for organizations looking to expand their impact, many civil society organizations using these types of tools have limited capacity, resources, and personnel to take on, maintain, and scale effective technology. **Ongoing technical support** is therefore crucial to effectively address contemporary forms of slavery. Maintaining tech tools is particularly important, as organizations often receive funding to deploy or develop a specific technology. However, without ongoing resources and support, they have difficulties keeping the technology up to date and operational.

Second, survivors of exploitation are often excluded from the development and deployment of the very tools meant to provide them with support. **Active engagement and participation of those closest to the issue**, those benefiting from interventions, is important to inform the effective use of these technology tools.

Third, technology solutions must be **fit for purpose**. Those who are funding, developing, and implementing technology-based solutions should take steps to ensure that the solution is actually fit for purpose, taking into account issues of access, geographic coverage, literacy, organizational resources, and technical infrastructure prior to deploying a solution. This requires stakeholder engagement and an informed approach.

Fourth, we must recognize that **there are limits as to what technology is capable of doing**. Technology cannot act as a substitute for the multitude of other actions that are also needed in order to effectively combat contemporary forms of slavery. Political will, adequate resources, and commitments from actors across sectors are all irreplaceable. Technology is but an important component in a larger effort.

Fifth, and finally, we must **consider the simple solutions**. Complex or advanced technological solutions are not always necessary; depending on the issue being address, straightforward, easy to deploy tech solutions may be more effective as they are easier to maintain and scale, and are more accessible to a wider range of organizations and/or victims. Most organizations working to prevent contemporary forms of slavery are looking for simple, streamlined solutions, or are focused on the underlying infrastructure that would allow them to use such services in the first place (e.g., laptops, reliable internet, and so on).

There is no single solution to the potential misuse of technology for contemporary forms of slavery, just as no one actor or technology can address the problem in isolation. The approach must be multifaceted, and informed by a diverse set of perspectives. Technology companies, governments, and international organizations alike must continuously seek to collaborate and learn from one another in order to be most effective.