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A case study of tourism companies' modern slavery statements

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Abstract

Modern slavery is perceived to be a problem in the tourism industry but it has received very limited attention in the academic tourism literature. This case study looks to extend the current literature on modern slavery within the tourism industry by reviewing the modern slavery statements of a number of leading tourism companies. The case study outlines the characteristics of modern slavery and reviews, and reflects on, the modern slavery statements of six leading tourism companies, namely, Expedia Group, TUI, Flight Centre Travel Group, Trip Advisor, Intrepid Travel, and Hays Travel. The results reveal that eight themes, namely, corporate commitment; codes of conduct; risk assessment; due diligence; supply chains; building awareness and providing training; the role of stakeholders; future plans and performance measures; effectively captured the spirit of the selected tourism companies' approach to modern slavery statements.

Keywords: Modern Slavery, Modern Slavery Statements, Tourism Companies, Stakeholders, Research Challenges

Introduction

Modern slavery, simply defined as the 'activities involved when one person obtains or holds another person in compelled service' (Unseen 2021a) is an insidious problem in many sectors of the global economy. The Conversation (2017), an independent source of news and views, sourced from the academic and research community, argued that 'the costs of production of the tourist experience are often glossed over', that 'modern slavery practices are especially evident in the tourism supply chain in developing countries', and that 'when it comes to international tourism, concerns over links with modern slavery have been mostly subdued.' Baum and Hai (2019) claimed 'at a time of sustained growth in demand for tourism worldwide, the industry faces persistent challenges with respect to employment, highlighted, inter alia, with respect to low pay, precarious security, poor working conditions, high labour turnover, intersectional disadvantage, occupational ghettoisation and employee sexual and physical abuse that can represent modern slavery. These issues appear to be systemic, structural and universal across all countries and within both formal and informal economies.' In inviting submissions to a session entitled 'Modern day slavery in global tourism supply chains: A geography of marginalization', at its 2019 Annual Conference, the Association of American Geographers (undated) asserted that 'the implications for aligning modern day slavery with tourism is profound because although tourism has become ever more prominent across the global landscape, it has largely evaded scrutiny where connotations of modern slavery have been made.' Further, the Association of American Geographers (undated) argued that the presence of modern slavery in global tourism supply chains is largely under acknowledged, and more specifically that 'relevant scholarly discourses..... Have largely neglected placing global tourism within the constructs of modern day slavery.' The issue of modern slavery in the tourism industry has certainly received limited attention in the academic tourism literature. With these thoughts in mind, this case study looks to explore one of the ways in which a number of leading travel companies have addressed this issue by reviewing their modern slavery statements, and as such, the case study looks to extend the current literature on modern slavery within the tourism industry.

Modern Slavery and Modern Slavery Statements

There are many definitions of slavery and Allain and Bales (2012) argued 'the very term slavery and its contours are contested.' Though the first international definition of slavery, namely 'slavery is the status or condition of a person over whom any or all of the powers attaching to the right of ownership are exercised' was established in 1926 (United Nations Office of the High Commissioner Human Rights 2021), slavery has existed throughout history. While slavery has been officially banned throughout the world it still exists but now revolves around illegal control, rather than legal ownership. Anti-Slavery (2021) estimated that some 40 million people are trapped in modern slavery across the world.

Unseen (2021a), a charity working 'towards a world without slavery', described modern slavery as an umbrella term for the 'activities involved when one person obtains or holds another person in compelled service.' Such activities include human trafficking, forced labour, debt bonded labour, descent-based slavery, slavery of children, and forced or early marriage. Each of these activities has its own characteristics. Debt bonded labour, for example, perhaps the most widespread form of modern slavery, occurs where people trapped in poverty borrow money, and are forced into work to pay off the debt, and in so doing, lose control over their employment conditions, and the original debt. Human trafficking involves the use of violence, threats, or coercion to transport, recruit or harbour people, for labour, forced prostitution or marriage.

In many ways modern slavery often effectively goes unseen in that many of the people working in slavery are in companies' supply chains, while those in customer facing operations might look very much the same as many of their fellow workers. That said, Unseen (2021b), identified some indicative signs of modern slavery and human trafficking. Namely, individuals who show signs of physical or psychological abuse, look malnourished, unkempt, anxious or agitated, or appear withdrawn or neglected. Their living conditions might be dirty, cramped and overcrowded and they might always wear the same clothes, have few personal possessions, and no identification documents. Further, they might be dropped off at, and collected from, their place of work, early in the morning and late at night, and they may be reluctant to seek help from fellow workers, and be very wary of law enforcement officers and agencies.

A number of governments, as well as a wide range of national and international organisations, have been active in looking to tackle the issue of modern slavery. Some of the major political initiatives to tackle modern slavery has focused on urging large companies to address modern slavery both within large own operations and arguably more importantly in the supply chains. In 2015 the UK Government, for example, pioneered this approach in introducing the Modern Slavery Act, requiring all businesses with an annual turnover in excess of £36 million, to produce an annual modern slavery statement, setting out the steps they have taken to prevent modern slavery in their business and supply chains. Here the challenge is for businesses is to take serious and effective steps to identify and root out modern slavery and all businesses must be vigilant and focus on continuous improvement. More recently a small number of countries have also introduced legislation to tackle modern slavery within supply chains. In 2018 Australia, for example, introduced a Modern Slavery Bill, modelled in part on the UK legislation, which included prescribed criteria for corporate modern slavery statements.

Reviewing the Literature

To date, modern slavery in the tourism industry has attracted little attention in the academic literature. In part, this may reflect a reluctance within the industry, and its supply chains, to permit researchers access to documentation and decision makers to allow them to pursue research investigations into modern slavery. Denying access for such research may reflect commercial sensitivities and/or concerns about essentially publicly unspoken corporate concerns about employee recruitment and labour practices within supply chains, and attendant fears of damaging publicity, and possibly criminal prosecution, if modern slavery practices are explicitly revealed. In part the lack of published research on modern slavery within the tourism industry may also reflect researchers' fears for their personal safety if looking to undertake research, in settings where illegal, and criminal activity may be commonplace, and then publish their research findings. Here covert approaches may seem to offer a way forward, but such approaches are unlikely to offer genuine security in an environment where anxiety and suspicion may be rife.

Cheer (2018) argued 'that tourism is inherently labor intensive, provides ideal conditions for potential transgressions that leverage human exploitation, especially concerning labor and human rights. Accordingly, this should signal to tourism geographers that the association between modern slavery practices and tourism presents a potentially rich seam for critical tourism geographies research.' Cheer (2018) further argued that 'one of the clearest manifestations of modern slavery in tourism is the practice of orphanage tourism in less developed contexts' and 'in linking orphanage tourism to modern slavery practices, tacit acknowledgement is made that at stake for children are their human rights, as they become commodities for the explicit purpose to pose as orphans.' Under the banner 'modern slavery and tourism: when holidays and human exploitation coincide', Cheer et al. (2017) outlined work designed to develop a policy framework to help a variety of agencies, including government, non-government and civil society groups, to co-operate more effectively to manage the orphanage tourism phenomenon.

Some work has been published on tourism and historic slavery sites. In a study of 'Transatlantic Slave Trade (TAST) sites' in Ghana, Yankholmes and McKercher (2015) concluded 'no understanding of the slavery heritage tourism phenomenon is complete without a better understanding of the people who consume such sites. The current study presented evidence that indicated that four types of visitors go to these sites. Based on their connection to slavery and trip purpose, these people were found to be racially, geographically and experientially different.' Thus the 'connected slavery heritage visitors', for example, 'tend to be from the United States, largely middle class, well educated with prior interest in the past' and 'they were mostly visiting to re-establish connection to their progenitors.' In a similar vein, the 'connected vacationer was defined as having a strong personal connection to slavery but not seeking their roots' while the 'not connected Caucasian group comprises mostly young people from several European countries, with no connection to slavery and with varied trip purposes.'

Buzinda and Santos (2009) explored the way in which tourists 'endow a former slave plantation with meaning by promoting or demoting its cultural authority' in a study based on the Hampton Plantation and State Historic Park, which was an active state plantation during the 18th and 19th century, in South Carolina. In their conclusion Buzinda

and Santos (2009) concluded as ‘heritage audiences become increasingly international and multicultural, slave related sites ought to craft metanarratives that incorporate pluralistic perspectives. Representations focused on a tourist-centered ethos will allow for portrayals that lure diverse populations and facilitate wider voice resonance within depictions.’ Small (2012) explored the nature, role and functioning of slave cabins and identified the strategies employed in presenting slave cabins as part of heritage tourism, each of which reflected divergent heritage goals.

While Caruana et al. (2020) argued that modern slavery offered potential for many innovative theoretical approaches, little conceptual work has been undertaken on modern slavery within tourism. That said, three sets of theoretical approaches, namely institutional theory, stakeholder theory and contingency theory, merit attention. Flynn and Walker (2020) employed institutional theory, to explore how firms listed on the Financial Times Stock Exchange were responding to modern slavery risks in their supply chains. Here institutional theory was selected because Flynn and Walker (2020) argued that the transparency provision in the 2015 legislation represented institutional, rather than market, pressure on companies.

In their work on modern slavery in supply chains, Stevenson and Cole (2018) suggested that both stakeholder theory and institutional theory offered potential for future research on modern slavery. Here, for example Stevenson and Cole (2018) argued that stakeholder theory was valuable in that while the primary audiences for modern slavery statements were external stakeholders, it was important for companies to consider what their modern slavery statements revealed to their suppliers. Gold et al. (2015) argued that research questions about modern slavery could be fruitfully framed by contingency theory and institutional theory. The former was seen to help to achieve a deeper appreciation of the importance of culture, geography, legislation and regulation, while the latter could help in investigations of how, and why, modern slavery traders can continuously resist pressures to adopt more legitimate forms of business.

This literature review of modern slavery in the tourism industry suggests that the field is currently fragmented, and at a best, embryonic. While the review offers a brief introduction to the field, it does not identify modern slavery in the tourism industry as distinct field of research, not least in that it lacks an agreed framework, empirically informed research and a theoretical foundation. Perhaps more importantly in the light of the aims of this paper, the current literature review reveals little research on how major tourism companies have addressed modern slavery. As such, this highlights a gap in the tourism literature, but given the role tourism companies, often potentially unwittingly, play in modern slavery, it surely merits attention. More generally, Wen et al. (2020) called for more research to ‘examine the dynamics underlying the diverse causes, nature, and consequences of modern slavery.’

Methodology

In looking to undertake an exploratory review of how some of the major tourism companies had approached animal welfare, the authors chose a simple method of enquiry which they believe to be fit for purpose. A preliminary survey of major tourism companies revealed that the modern slavery statements of six companies, namely, Expedia Group, TUI, Flight Centre Travel Group, Trip Advisor, Intrepid Travel, and Hays Travel, were readily accessible on the Internet. The authors believe this is an appropriate approach in a paper designed to review how some of the major tourist companies were addressing modern slavery rather than to provide either a comprehensive or comparative analysis of how companies were tackling modern slavery across the tourism industry.

Internet searches were conducted in May 2021 using the name of each of the selected tourism companies and modern slavery statement as the key phrases. The most recent modern slavery statement from each of the selected companies provided the empirical material for this case study. This material is in the public domain on the selected tourism companies’ websites and the authors took the considered view that they did not need to seek permission to use it. A number of authors have used forms of content analysis to systematically identify themes and issues on corporate websites. However, given the exploratory nature of the paper and that the modern slavery statements posted on the selected companies’ websites were relatively brief and clearly signposted, the authors were minded that content analysis was not appropriate. Rather, the authors undertook a close reading of the statements to draw out the important issues and themes.

The review draws on selected quotations drawn from the selected tourism companies’ websites. the aim here, was to explore how the companies publicly expressed, and evidenced, their modern slavery statements, and the authors took the view that this was perhaps best captured in the companies’ own words, not least in that quotations could convey corporate authenticity, and offer greater depth of understanding (Corden and Sainsbury 2006). At the same time, the authors satisfied themselves that the two conditions outlined by Saunders et al. (2009), relating to the reliability of information drawn from Internet sources, namely the authority and reputation of the source and the citation of a contact on the website, were met.

Findings

The modern slavery statements posted by the selected tourism companies varied in style and content, but rather than describing each statement in detail, the authors looked to identify, and draw out, a number of general themes. More specifically, the authors identified eight themes, namely, corporate commitment; codes of conduct; risk assessment; due diligence; supply chains; building awareness and providing training; the role of stakeholders; future plans and performance measures, which effectively captured the spirit of the selected tourism companies' approach to modern slavery statements. In practice many of these themes are linked together but in this case study they are systematically and separately identified.

The tourism companies' corporate commitments to tackle modern slavery were expressed in a variety of ways. The Expedia Group (2021), for example, asserted that it respected 'human rights and workplace rights', and claimed 'Expedia Group is committed to conducting its business in a manner that protects these rights, and prohibits and opposes all forms of modern slavery, servitude, forced labor and human trafficking.' The Flight Centre Travel Group (2020) claimed 'we are committed to responsible and sustainable travel and tourism, including the identification and prevention of all forms of modern slavery in our business and supply chains.' Intrepid Travel (2019) emphasised its 'zero tolerance approach to modern slavery', and that the company was 'fully committed to preventing slavery and human trafficking in our operation and supply chain', while Trip Advisor (2021) emphasised its commitment to 'assist in preventing and combatting modern slavery.'

A number of the selected companies outlined their codes of conduct which emphasised their approach to ethics, human rights and modern slavery. TUI's (2020) 'Integrity Passport', launched in 2018, looks to strengthen the company's human rights commitment associated with preventing modern slavery. Expedia Group's (2021) code of conduct, namely its 'Boarding Pass', provides the standards of integrity that the company requires all its employees to follow, and it focuses upon acting ethically and with integrity in all its business relationships, including 'opposing modern slavery and human trafficking of any kind.' All the Flight Centre Travel Group's (2016) employees are required to read and comply with the company's 'Code of Conduct', which includes a description of 'modern slavery and human trafficking', which highlights 'key risk areas that employees are encouraged to monitor for signs of human right violations.'

Risk assessments offered some insights into the tourism companies' perceptions of the sources of modern slavery. TUI (2020), for example, reported that the company 'continued to assess our operations and supply chain to improve our understanding of modern slavery risks, by taking into consideration product and industry risks, supply chain complexity and workforce characteristics.' These assessments revealed that 'the highest risk continued to be in areas of our business and supply chain where there are migrant, low-skilled labour, young workers and outsourced workers.' Further, TUI (2020) reported that their assessments revealed child exploitation was a risk area in Kenya and Tanzania.

In addressing the 'risks of modern slavery practices', Flight Centre Travel Group (2020) revealed the 'the potentially high risks regions for modern slavery' included 'the Middle East, Africa and South East Asia', and that 'Cambodia, Thailand and Vietnam' were assessed as 'potentially high risk countries.' At the same time, Flight Centre Travel Group (2020) identified a wide variety of activities including airline charter flights, cruise ships, tour operators, as presenting high risks of modern slavery, and that specific problems across these activities included underpayment and excessive working hours, child labour, and child trafficking.

The majority of the selected tourism companies certainly recognised that their supply chains present a high risk of modern slavery and reported on how they looked to work with their suppliers to combat modern slavery and human trafficking. The Expedia Group (2021), for example, claimed 'to have begun to seek ways to utilise our systems to assist our travel suppliers and partners in identifying potential instances of human trafficking, and enhance their own monitoring.' To this end, the Expedia Group (2021) has developed a 'Vendor Code of Conduct', which sets out the company's expectations of all its suppliers in combatting modern slavery. In addressing 'our supply chains', Hays Travel (2019) reported that the company was committed 'to ensuring that there is no modern slavery or human trafficking in our supply chains', and that 'we have communicated to suppliers, contractors and business partners our zero-tolerance approach to modern slavery.' One of the selected tourism companies reported commissioning regular audits of their supplies in an attempt to check that codes of conduct were being properly observed. Flight Centre Travel Group (2020), for example, reported undertaking 'regular internal and external audits of payroll to ensure our workers are being paid correctly', while Intrepid Travel outlined the work of its internal audit committee.

Due diligence processes are reported as an important theme in many of the selected tourism companies' modern slavery statements. Intrepid Travel (2019), for example, reported that the company conducted a range of due diligence

processes, covering recruitment and employment, global supplier benchmarking, traveller feedback and reports from tour leaders. In addressing recruitment, for example, the company reported conducting ‘the appropriate level of due diligence on our prospective employees before them joining Intrepid Group’ (Intrepid Travel 2019). TUI (2020) reported that the company had ‘fully implemented enhanced due diligence tools and processes in procurement to enable us to categorise high-risk services and suppliers in relation to modern slavery.’

The selected tourism companies acknowledged the importance of awareness raising and training in looking to tackle modern slavery. TUI (2020), for example, emphasised ‘raising awareness of human rights and modern slavery across our business continues to be a key focus area.’ Further the company reported that in 2019 it had developed and rolled out new training sessions and communication material on modern slavery including information on child protection, orphanage tourism, and the internal reporting of modern slavery concerns. Hays Travel (2019) claimed ‘we have provided training to our staff to ensure a high level of understanding of the risks of modern slavery and modern trafficking in our supply chains and our business and to make sure they fully understand the behaviour expected of them.’ Flight Centre Travel Group (2020) emphasised that ‘improving staff and management awareness of modern slavery is vital to our sustainable and ethical approach to reduce the risk of slavery or human trafficking not being identified and addressed within our business or across our supply chains.’

A number of the selected tourism companies acknowledged the role of a range of their stakeholders in tackling modern slavery. TUI (2020), for example, recognised that non-governmental organisations were important partners in the fight against modern slavery, forced labour and human trafficking around the world, and emphasised that the company ‘takes these campaigns seriously and is committed to addressing any issues raised.’ TUI (2020) also reported on its ‘destination stakeholder initiatives’, and here the focus was on looking to protect young children and adolescents, who are at risk of trafficking, commercial sexual exploitation and exploitative labour practices, by providing the tools and support to help to identify and prevent exploitation. More specifically TUI Care Foundation supports academies in Mexico, Thailand, the Dominican Republic, Vietnam, Sri Lanka, Jordan, Germany and Sweden. The TUI Academy in the Dominican Republic, for example, offers a training programme, including vocational training, life skills and an internship within the tourism industry, while the academies in Jordan, Germany and Sweden offer a mentoring programme to young people in vulnerable communities.

Some of the selected tourism companies reported on their future plans to continue, and to strengthen, their battle against modern slavery. Hays Travel (2019), for example, outlined its plans to implement a supplier code of ethics and conduct for its suppliers and to include ‘specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, as part of our contracting process.’ In a similar vein, Intrepid Travel outlined its future plans, which focused on risk assessment, training and awareness raising. More generally, under the banner ‘Looking Ahead’, Trip Advisor (2021), simply reported ‘we will continue to further improve our practices and processes to help combat modern slavery.’ However, only one of the selected companies, namely, TUI, addressed their progress, to date, against performance measures in looking to prevent modern slavery. These measures covered six issues including training on human rights in tourism, steps taken to strengthen supply chain management, and the number of modern slavery cases reported and the actions taken in response to these reports.

Reflections

The selected tourism companies’ modern slavery statements captured a central element in their public approach to tackling what is a complex and challenging problem, but some wider issues merit reflection and discussion. The findings suggest that while each of the tourism companies emphasised their commitments to tackle modern slavery, in part at least these commitments are very much a work in progress in that they are both aspirational and expectational. Aspirational in that the tourism companies explicitly expressed a desire to tackle modern slavery problems within their operations and across their supply chains. Expectational in that they expected companies within their supply chains to comply with policies and codes of conduct established by the tourism companies.

Identifying, and tackling modern slavery problems within supply chains arguably presents a major challenge for the tourism companies. Here the tourism companies’ commitments to tackling the problems of modern slavery are at least one, and in many cases, many, steps removed from their direct corporate control. While approaches developed around codes of conduct certainly help to set corporate expectations, where a tourism companies’ supply chains have a wide geographical span and where suppliers face economic pressures to maintain competitive prices, there is the danger that such codes are nominally, rather than consistently, observed. Here some of the tourism companies claimed their approach to tackling modern slavery in their supply chains was underwritten by independent auditing, but general concern has been raised about the efficacy of the audit process. The pressure group Anti-Slavery International (2021), for example, argued that such approaches have their limitations, not least in that ‘the quality and scope of

auditing may be questionable, or there may be practical difficulties such as auditors being unable to speak with workers in their own language.'

The very concept of the modern slavery statement has attracted a number of criticisms. New and Hsin (2021), for example, argued that while modern slavery statements 'present interesting information about the management of working conditions in the firms' supply chains, they do little to address the problems of modern slavery per se.' Simic and Blitz (2019) argued that modern slavery statements are 'often perfunctory and are used to satisfy international agendas and country commitments, or to enhance the perception of the country and its position in the global outsourcing business.' Simic and Blitz (2019) also argued that the capacity of modern slavery statements 'is often limited, especially as it regards remedying risks', and that 'the quality, scope, depth, and regularity of reports are frequently compromised, especially since there are no meaningful sanctions for non-compliance.'

There have also been issues about the ambivalent role of the media in publicising modern slavery statements. Simic and Blitz (2019, p. 11), for example, argued that on the one hand 'companies' over-reliance on media exposure of transparency statements has been instrumentalised by the state which has paid lip service to proper law enforcement mechanisms.' On the other hand, Simic and Blitz (2019, p.

11) also suggested that 'the possibility of unsolicited media publicity may often act as a deterrent for businesses and could push them in the opposite direction: it can enhance non-compliance or highly restrained compliance.'

More generally, this review of modern slavery statements has some implications for institutional theory, contingency theory and stakeholder theory. The selected tourism companies can be seen to have responded positively to government pressure and legislation to tackle modern slavery. As such the tourism companies' approaches to modern slavery can be seen to be consistent with institutional theory. At the same time, the review suggested that while the selected tourism companies emphasised their commitment to tackle modern slavery, their aspirational and expectational approach and their limited approach to audit processes in their supply chains, suggests that institutional theory does not tell the full story in conceptualising corporate approaches to modern slavery. Contingency theory helps to shed some light on how the selected tourism companies have approached modern slavery, but perhaps only in so far as it signals that many of the characteristics of the tourism industry seem to make it susceptible to modern slavery. In that the tourism companies outlined the role of stakeholder initiatives in tackling modern slavery, stakeholder theory might be seen to be useful in informing how the selected companies have developed their modern slavery statements. However, stakeholder theory is generally seen to be based on open relationships, trust and shared goals, and these qualities are certainly not common to all the stakeholders involved in modern slavery.

Conclusions

This case study provides an exploratory review of how a number of leading tourism companies have addressed modern slavery via an examination of their modern slavery statements. As such, the paper adds to the limited literature on modern slavery within the tourism industry. The authors recognise that the case study has a number of limitations, not least that the empirical material is drawn exclusively from the corporate websites of the selected tourism companies at a set point in time, and does not include any primary information obtained from the tourism companies or their suppliers. However, the authors believe this approach is appropriate in what is an explanatory review, and that the case study makes a small contribution to an area that has received limited attention to date in the academic tourism literature and that it may provide a platform for future research into modern slavery in the tourism industry.

However, while modern slavery within the tourism industry, offers a potentially rich variety of research opportunities, it is important to recognise that it is a very challenging research arena. Slavery may be illegal but it can also be a lucrative economic activity, and those individuals and organisations involved in modern slavery, human trafficking and bonded labour, will generally do all they can to hide, and maintain the secrecy of, their activities. Researchers who look to conduct primary research into modern slavery activities may be placing themselves, possibly their research colleagues, and those who participate in such research, in serious personal danger. Problems, and tactics designed to minimise such problems, are rarely addressed in the research literature but, they may curtail many potentially promising modern slavery research agendas. At the same time, researchers may face a range of ethical issues, not least researchers' responsibility to those who participate in their research. More generally, while there are some guidelines for social science researchers looking to pursue hidden activities (e.g., Ellard-Gray et al. 2015), researching modern slavery within the tourism industry seems fraught with difficulties and dangers.

That said, a number of potential research opportunities into corporate approaches to modern slavery within the tourism industry can be identified. Here, the ways in which a wider variety of tourism companies address the issue of modern slavery merits attention, and could include large scale questionnaire surveys of, as well as personal interviews and focus groups with, senior executives within the industry to learn how tourism companies are developing and

continually looking to strengthen, their policies on modern slavery. Such research agendas may also explore if, and how, employees, customers, suppliers, governments, and law enforcement agencies are involved in the policy development process. In addition, such research into modern slavery within the tourism industry may help both to test, to and illuminate, theoretical approaches to modern slavery, and perhaps more importantly, help to answer the call by Gold et al. (2015) for new theory development to facilitate the understanding of modern slavery.

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