

An Analysis of China's Social Credit System: Evolution, Impact, and Controversies

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White 2 CCTV Camera Mounted on Black Post Under Clear Blue Sky, by AS Photography, 3 April 2016
<https://www.pexels.com/photo/white-2-cctv-camera-mounted-on-black-post-under-clear-blue-sky-96612/>

I. Introduction

This report delves into the multifaceted landscape of China's Social Credit System (SCS), a framework designed to evaluate and regulate the behaviour of its 1.4 billion citizens and businesses.¹

¹ S. R. Hoffman, 'Programming China: the Communist Party's autonomic approach to managing state security' (*Political Science*, 2017) <<https://eprints.nottingham.ac.uk/48547/>> accessed 25 August 2024.

Emerging from a historical backdrop dating back to the 1980s,² the SCS highlights the Chinese government's commitment to establishing trust and accountability across various sectors.³ Officially launched in 2002, it encompasses diverse components, including Public Credit Information (PCI) and localised blacklisting efforts,⁴ aimed at promoting lawful conduct and societal trust.⁵ However, these mechanisms raise significant concerns regarding privacy and civil rights, as mandatory data collection and pervasive surveillance practices often clash with constitutional protections and international standards.⁶ By examining these intricate elements, this report seeks to illuminate the ongoing tension between state authority and individual rights within the context of the Social Credit System.

II. Overview of the Social Credit System

The origin of China's Social Credit System (SCS) dates back to the 1980s when the Chinese government began efforts to establish a credit rating system for rural citizens and small businesses lacking formal credit histories.⁷ Drawing inspiration from Western models like FICO,⁸ the Chinese government aimed to build societal trust and regulate business practices, particularly in areas such as food safety, intellectual property, and financial fraud.⁹ These sectors were critical because misconduct in these areas could undermine public trust. By regulating these practices, the government sought to create a more transparent and reliable business environment, reduce risks for consumers, and encourage lawful behaviour among companies.

The SCS achieves its goals through various mechanisms that hold individuals and businesses accountable for their actions. Individuals and businesses are assigned credit scores based on their behaviours, including financial transactions, legal compliance, and social conduct. A higher score reflects trustworthy behaviour, while a lower score indicates potential risks or misconduct. Those with high credit scores may receive benefits such as easier access to loans, lower interest rates, and expedited services, thereby incentivising positive behaviour and compliance with laws and regulations. Conversely, individuals and businesses with low scores face various penalties, including

² Frank N. Pieke and Bert Hofman, 'PC Futures: The New Era of Socialism with Chinese Characteristics' (*C. National University of Singapore Press*, 7 September 2022) <<https://doi.org/10.56159/eai.52060>> accessed 20 August 2024.

³ Zeyi Zang, 'China just announced a new social credit law. Here's what it means' (*MIT Technology Review*, 22 November 2022) <<https://www.technologyreview.com/2022/11/22/1063605/china-announced-a-new-social-credit-law-what-does-it-mean/>> accessed 25 August 2024.; Jessica Reilly, Muyao Lyu and Megan Robertson, 'China's Social Credit System: Speculation vs. Reality' (*The Diplomat*, 30 March 2021) <<https://thediplomat.com/2021/03/chinas-social-credit-system-speculation-vs-reality/>> accessed 24 August 2024.

⁴ National Catalog of Basic Public Credit Information' (*China Law Translate*, 14 July 2021) <<https://www.chinalawtranslate.com/en/public-credit-information-list/>> accessed 19 August 2024.; 'Guiding Opinions on Strengthening and Regulating Efforts on the Management of Lists of Persons Receiving Efforts on the Management of List of Persons Receiving Joint Incentives for Trustworthiness or Joint Punishment for Untrustworthiness' (*China Law Translate*, 23 March 2018) <<https://www.chinalawtranslate.com/en/guiding-opinions-on-strengthening-and-regulating-efforts-on-the-management-of-lists-of-persons-receiving-joint-incentives-for-trustworthiness-or-joint-punishment-for-untrustworthiness/>> accessed 17 August 2024.

⁵ 'Further Improving Systems for Restraining the Untrustworthy and Building Mechanisms for Building Creditworthiness that have long term Effect' (*General Office of the State Council*, 18 December 2020) <https://www.gov.cn/zhengce/content/2020-12/18/content_5570954.htm> accessed 19 August 2024.; 'Several Provisions of the Supreme People's Court on Restricting High Spending by Persons Subject to Enforcement' (*Supreme People's Court*, 17 May 2010) <<https://www.court.gov.cn/shenpan-xiangqing-1650.html>> accessed 17 August 2024.

⁶ Vrinda Vinayak, 'The Human Rights Implications of China's Social Credit System' (*Oxford Human Rights Hub*, 6 September 2019) <<https://ohrh.law.ox.ac.uk/the-human-rights-implications-of-chinas-social-credit-system/#:~:text=Freedom%20of%20movement%20is%20not%20constitutionally%20guaranteed%2C%20and,available%20to%20children%20contingent%20on%20their%20parents%E2%80%99%20scores>> accessed 25 August 2024.

⁷ S. R. Hoffman, 'Programming China: the Communist Party's autonomic approach to managing state security' (*Political Science*, 2017) <<https://eprints.nottingham.ac.uk/48547/>> accessed 25 August 2024.

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⁹ Jessica Reilly, Muyao Lyu and Megan Robertson, 'China's Social Credit System: Speculation vs. Reality' (*The Diplomat*, 30 March 2021) <<https://thediplomat.com/2021/03/chinas-social-credit-system-speculation-vs-reality/>> accessed 24 August 2024.

travel restrictions, difficulties in securing loans, and limitations on access to certain public services, which discourage unethical behaviour and ensure that there are tangible consequences for misconduct.

The system also involves publicising credit scores or records of individuals and businesses, impacting their reputation. This transparency holds them accountable to the community and encourages responsible behaviour. Furthermore, the SCS utilises data from multiple sources, including financial institutions, government agencies, and social media, to continuously monitor behaviour. This comprehensive approach allows for timely interventions when individuals or businesses violate laws or regulations, thereby ensuring adherence to laws, regulations, and contracts. The system reinforces the idea that individuals and businesses must act responsibly, with legal consequences for violations serving as a deterrent to unethical behaviour.

On a broader level, the government aims to promote societal trust by encouraging both individuals and businesses to act in ways that enhance mutual reliability within society. The system applies across various aspects of life, from daily interactions to business dealings and adherence to laws and regulations. By incentivising ethical behaviour and holding wrongdoers accountable, the government seeks to create a more cohesive, orderly, and cooperative society.

The Social Credit System was formally introduced during the 16th National Congress of the Chinese Communist Party (CCP) in 2022, although its final form had yet to be defined.¹⁰ The system's development progressed with the People's Bank of China creating the Credit Reference Center in 2006, which by 2019 had amassed basic financial records for 990 million citizens.¹¹ In 2007 the Inter-ministerial Joint Conference on the Establishment of the SCS was formed to guide its implementation.¹²

China's Social Credit System is a complex policy framework involving multiple systems managed by both state and private entities.¹³ It addresses two key areas: financial creditworthiness, which assesses the financial reliability of individuals and companies, and social creditworthiness, which aims to cultivate trust by targeting issues like corruption, tax evasion, and environmental pollution.¹⁴

The overarching goal of the Social Credit System is to strengthen trust in Chinese society by holding individuals and businesses accountable for their actions.¹⁵ By addressing a broad spectrum of societal and economic challenges, the system seeks to ensure adherence to laws, regulations, and contracts, ultimately fostering a more trustworthy and orderly environment in China.¹⁶

III. Balancing Local and Central Control in Social Credit¹⁷

¹⁰ Vincent Brussee, 'Social credit: The Warning States of China's Emerging Data Empire' (*Palgrave Macmillan*, 2023) <<https://link.springer.com/book/10.1007/978-981-99-2189-8>> accessed 25 August 2024.

¹¹ *ibid.*

¹² *ibid.*

¹³ *ibid.*

¹⁴ Kristina Kironka and Richard Q. Turcsanyi, 'Contemporary China: A New Superpower?' (*Routledge*, 18 august 2023) <<https://doi.org/10.4324/9781003350064>> accessed 24 August 2024.

¹⁵ Jessica Reilly, Muyao Lyu and Megan Robertson, 'China's Social Credit System: Speculation vs. Reality' (*The Diplomat*, 30 March 2021) <<https://thediplomat.com/2021/03/chinas-social-credit-system-speculation-vs-reality/>> accessed 24 August 2024.

¹⁶ *ibid.*

¹⁷ Zeyi Zang, 'China just announced a new social credit law. Here's what it means' (*MIT Technology Review*, 22 November 2022) <<https://www.technologyreview.com/2022/11/22/1063605/china-announced-a-new-social-credit-law-what-does-it-mean/>> accessed 25 August 2024.; 'Chinese Corporate Social Credit System (CSCS)-PwC China Compass' (*PwC*, 15 February 2021) <<https://www.pwc.de/en/international-markets/german-business-groups/china-business-group/chinese-corporate-social-credit-system-cscs.html>>

The central government's limited direction on developing a social credit system for non-financial sectors has opened the doors for cities and small towns to implement their own approaches. As it happened in Rongcheng in 2013, when the city introduced a system where each resident started with a base score of 1,000 points which could be adjusted based on their actions. For instance, in a 2016 rule that has since been overhauled, the city decided that spreading harmful information on WeChat, forums, and blogs would result in a 50-point deduction while winning a national-level sports or culture competition would add 40 points. In one extreme case, a resident lost 950 points within three weeks for repeatedly posting letters online about a medical dispute. However, such scoring systems have never been elevated to the national level.

The Chinese central government has responded to local governments' overreach in enforcing social credit regulations by recognising that some local authorities were using the system to penalise minor offences like jaywalking, improper recycling, and not wearing masks. The central government thereby issued guidance to local governments to punish actions already deemed illegal under existing laws. As a result of this regulation, the local government in Rongcheng adjusted its approach, allowing residents to opt out of the scoring program in response to these guidelines.

Several provinces adopted this approach by developing localised systems to comply with the new regulations. For instance, Suzhou in Jiang Province has developed a Corporate Credit System within China's broader Social Credit System framework, emphasising business accountability and contract fulfilment. Businesses that maintain high scores are rewarded with preferential treatment in areas such as government procurement, public projects, and financial services, incentivising lawful behaviour. Conversely, companies with lower ranking face penalties, including restrictions on bidding for government contracts and potential public blacklisting, which can harm their reputation and limit business opportunities. In addition, Suzhou's system monitors individual citizens, particularly concerning financial reliability, such as timely debt repayment and adherence to financial regulations. This dual approach encourages ethical business practices while fostering mutual trust within both the business community and society at large, supporting a more structured and transparent environment.

IV. Regulatory Aspects of Public Credit Information (PCI)¹⁸

Public Credit Information (PCI) forms a key component of China's Social Credit System (SCS), serving as the foundation for evaluating the legal compliance and trustworthiness of businesses and individuals. It comprises various legal and administrative records, including business registration filings, professional licences, court judgments, criminal and administrative penalties, permits, and results from regulatory inspections. These records collectively assess whether entities

accessed 19 August 2024.; 'China steps up social credit system for financial market' (*Global Times*, 19 March 2022) <<https://www.globaltimes.cn/page/202203/1257134.shtml>> accessed 20 August 2024.

¹⁸'National Catalog of Basic Public Credit Information' (*China Law Translate*, 14 July 2021) <<https://www.chinalawtranslate.com/en/public-credit-information-list/>> accessed 19 August 2024.; 'Guiding Opinions on Strengthening and Regulating Efforts on the Management of Lists of Persons Receiving Efforts on the Management of List of Persons Receiving Joint Incentives for Trustworthiness or Joint Punishment for Untrustworthiness' (*China Law Translate*, 23 March 2018) <<https://www.chinalawtranslate.com/en/guiding-opinions-on-strengthening-and-regulating-efforts-on-the-management-of-lists-of-persons-receiving-joint-incentives-for-trustworthiness-or-joint-punishment-for-untrustworthiness/>> accessed 17 August 2024.

adhere to the regulatory frameworks governing their operations. In addition to mandatory data, PCI also integrates voluntary disclosures, such as financial reports or corporate social responsibility activities, further shaping the credit evaluations.

These records feed into the national credit evaluations that categorise market entities into ratings such as excellent, good, fair, or poor, based on their adherence to laws and regulations.¹⁹ Companies with higher ratings are rewarded with benefits, including preferential access to government contracts and financial incentives, whereas those with lower ranking face penalties, such as public blacklisting and restrictions on participation in government procurement.

While primarily relevant to businesses, the application of PCI to individuals is more restricted, and sensitive personal information, such as religious beliefs, juvenile records, or data about individuals with limited capacity, is generally excluded unless required by law. Furthermore, minor infractions, like fare evasion or running a red light, are only included when the offence is deemed serious or malicious. The overall purpose of PCI is to assist regulatory bodies in identifying significant violations and ensuring that only relevant data is used for enforcement, preventing unnecessary distractions and safeguarding privacy.

This comprehensive integration of PCI into the Social Credit System aims to ensure that both businesses and individuals maintain responsible behaviour, promoting a structured and trustworthy societal framework.

V. Sector-Specific Blacklisting and Judicial Enforcement Mechanisms²⁰

Agencies in various sectors, such as food safety and market supervision, are tasked with developing and enforcing ‘blacklisting rules’ for legal violations that fall under their jurisdiction. This includes establishing criteria for adding and removing entities from their respective blacklists and outlining the consequences of being blacklisted. Each sector’s ‘blacklisting rules’ are made publicly and open for public comment for 30 days before they are adopted. Inclusion on a blacklist is reserved for the most serious violations of the law, such as those that endanger health and safety, disrupt marketplace operations, violate judicial or administrative orders, or involve a refusal to perform national defence duties.

A significant exception to the general blacklisting process is managed by the courts, which targets ‘judgement defaulters’. These are individuals capable of fulfilling court-order obligations but deliberately refuse to do so, often by concealing assets to evade enforcement. The court has the authority to limit spending for individuals with outstanding judgments to safeguard assets, prompting other agencies to impose direct restrictions, such as blocking the purchase of flights, home renovations, vacation travel, and enrolment in expensive private schools.

This enforcement ties closely to the rankings seen in the composite credit index from June 2024, which rated cities like Xiamen (93.22) and Guangzhou (92.35) at the top. Cities with higher composite credit scores reflect their ability to enforce such mechanisms effectively, indicating strict adherence to regulations across sectors. In areas such as Suzhou or Hangzhou, blacklisting has

¹⁹ General Office of the State Council, ‘Notice of the General Office of the National Development and Reform Commission on Advancing and Utilizing the Results of Comprehensive Public credit Appraisals of Market Entities’ (2019) 885.

²⁰ ‘Further Improving Systems for Restraining the Untrustworthy and Building Mechanisms for Building Creditworthiness that have long term Effect’ (*General Office of the State Council*, 18 December 2020) <https://www.gov.cn/zhengce/content/2020-12/18/content_5570954.htm> accessed 19 August 2024.; ‘Several Provisions of the Supreme People’s Court on Restricting High Spending by Persons Subject to Enforcement’ (*Supreme People’s Court*, 17 May 2010) <<https://www.court.gov.cn/shenpan-xiangqing-1650.html>> accessed 17 August 2024.

played a significant role in elevating business trustworthiness, legal compliance, and overall public safety. For example, companies in these cities that avoid blacklisting are often rewarded with preferential treatment in government procurement or financing, incentivising lawful behaviour, which, in turn, is reflected in their city’s higher composite credit index.



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Despite detailed national statistics on individuals or companies blacklisted not being regularly published, the individual blacklist entries are accessible online, thereby offering transparency.

VI. Privacy and Civil Rights Concerns in China’s Social Credit System²²

The right to privacy is a concern with regard to the social security system in China. Despite Article 40 of China’s Constitution²³ guaranteeing “privacy of correspondence”, the system mandates the collection and utilisation of data from all 1.4 billion citizens. Since 2020, this data has been compiled from both public and private sources without the need for individual consent or opt-in. The widespread sharing of data among private companies and government agencies, exemplified by applications like the ‘Deadbeat Map’, which shows details of any person on the government blacklist within 500 metres of a user, raises privacy concerns. The volume of data being collected and stored also increased the risk of hacking personal information, especially since China does not impose any security or reporting standards on data collection agencies.

Additionally, freedom of speech, as ensured by Article 35 of the Chinese Constitution,²⁴ is undermined through financial and travel sanctions imposed on dissidents. While freedom of movement is not constitutionally guaranteed, the Social Credit System significantly curtails it, resulting in widespread travel bans for those who are blacklisted. Article 49 of the Chinese

²¹ ‘Credit China’ (*Credit China*, 2024) <<https://www.creditchina.gov.cn/csxynw/?navPage=12>> accessed 20 August 2024.

²² Vrinda Vinayak, ‘The Human Rights Implications of China’s Social Credit System’ (*Oxford Human Rights Hub*, 6 September 2019) <<https://ohrh.law.ox.ac.uk/the-human-rights-implications-of-chinas-social-credit-system/#:~:text=Freedom%20of%20movement%20is%20not%20constitutionally%20guaranteed%2C%20and,available%20to%20children%20contingent%20on%20their%20parents%E2%80%99%20scores>> accessed 25 August 2024.; ‘Credit China’ (*Credit China*, 2024) <<https://www.creditchina.gov.cn/csxynw/?navPage=12>> accessed 20 August 2024.

²³ ‘Constitution of the People’s Republic of China. The State Council The People’s Republic of China’ (2019) article 40.

²⁴ ‘Constitution of the People’s Republic of China. The State Council The People’s Republic of China’ (2019) article 35.

Constitution,²⁵ which emphasises the sanctity of the family, has also been distorted, with children's access to benefits now tied to their parents' social credit scores. Although China is a signatory to the International Covenant on Civil and Political Rights (ICCPR), which permits restrictions on free speech in limited circumstances under Article 19(3),²⁶ the social credit system's surveillance and arbitrary sanctions violate these principles. Such actions go beyond the intended scope of restrictions and infringe upon the right to privacy.

VII. Conclusion

China's Social Credit System, conceived in the 1980s and officially launched in 2002, represents a significant evolution in the management of societal and economic behaviour.²⁷ Originally aimed at addressing credit gaps for rural and small business sectors, the system has grown into a multifaceted framework encompassing both financial and social evaluations.²⁸ It integrates various local and central controls,²⁹ Public Credit information (PCI),³⁰ and sector-specific blacklisting mechanisms to foster accountability and trust within society.³¹

The system's development reflects a complex balance between local experimentation and central oversight.³² Local authorities, such as those in Rongchen, have tested innovative approaches to scoring, though these have sometimes clashed with national regulations.³³ Regulatory aspects, particularly concerning PCI and blacklisting, are designed to ensure legal compliance while maintaining a focus on significant violations rather than minor infractions.³⁴

However, the Social Credit System has raised substantial privacy and civil rights concerns.³⁵ The mandatory data collection and surveillance practices challenge constitutional protections and

²⁵ 'Constitution of the People's Republic of China. The State Council The People's Republic of China' (2019) article 49.

²⁶ International Covenant on Civil and Political Rights (adopted 16 December 1966, entered into force 23 March 1976) 999 UNTS 171 (ICCPR) article 19 para 3.

²⁷ Vincent Brussee, 'Social credit: The Warning States of China's Emerging Data Empire' (*Palgrave Macmillan*, 2023) <<https://link.springer.com/book/10.1007/978-981-99-2189-8>> accessed 25 August 2024.

²⁸ S. R. Hoffman, 'Programming China: the Communist Party's autonomic approach to managing state security' (*Political Science*, 2017) <<https://eprints.nottingham.ac.uk/48547/>> accessed 25 August 2024.

²⁹ Zeyi Zang, 'China just announced a new social credit law. Here's what it means' (*MIT Technology Review*, 22 November 2022) <<https://www.technologyreview.com/2022/11/22/1063605/china-announced-a-new-social-credit-law-what-does-it-mean/>> accessed 25 August 2024.

³⁰ 'National Catalog of Basic Public Credit Information' (*China Law Translate*, 14 July 2021) <<https://www.chinalawtranslate.com/en/public-credit-information-list/>> accessed 19 August 2024.; (2018, March 23). 'Guiding Opinions on Strengthening and Regulating Efforts on the Management of Lists of Persons Receiving Efforts on the Management of List of Persons Receiving Joint Incentives for Trustworthiness or Joint Punishment for Untrustworthiness' (*China Law Translate*, 23 March 2018) <<https://www.chinalawtranslate.com/en/guiding-opinions-on-strengthening-and-regulating-efforts-on-the-management-of-lists-of-persons-receiving-joint-incentives-for-trustworthiness-or-joint-punishment-for-untrustworthiness/>> accessed 17 August 2024.

³¹ 'Further Improving Systems for Restraining the Untrustworthy and Building Mechanisms for Building Creditworthiness that have long term Effect' (*General Office of the State Council*, 18 December 2020) <https://www.gov.cn/zhengce/content/2020-12/18/content_5570954.htm> accessed 19 August 2024.; (2010, May 17). 'Several Provisions of the Supreme People's Court on Restricting High Spending by Persons Subject to Enforcement' (*Supreme People's Court*, 17 May 2010) <<https://www.court.gov.cn/shenpan-xiangqing-1650.html>> accessed 17 August 2024.

³² Zeyi Zang, 'China just announced a new social credit law. Here's what it means' (*MIT Technology Review*, 22 November 2022) <<https://www.technologyreview.com/2022/11/22/1063605/china-announced-a-new-social-credit-law-what-does-it-mean/>> accessed 25 August 2024.

³³ *ibid.*

³⁴ 'National Catalog of Basic Public Credit Information' (*China Law Translate*, 14 July 2021) <<https://www.chinalawtranslate.com/en/public-credit-information-list/>> accessed 19 August 2024.; (2018, March 23). 'Guiding Opinions on Strengthening and Regulating Efforts on the Management of Lists of Persons Receiving Efforts on the Management of List of Persons Receiving Joint Incentives for Trustworthiness or Joint Punishment for Untrustworthiness' (*China Law Translate*, 23 March 2018) <<https://www.chinalawtranslate.com/en/guiding-opinions-on-strengthening-and-regulating-efforts-on-the-management-of-lists-of-persons-receiving-joint-incentives-for-trustworthiness-or-joint-punishment-for-untrustworthiness/>> accessed 17 August 2024.

³⁵ Vrinda Vinayak, 'The Human Rights Implications of China's Social Credit System' (*Oxford Human Rights Hub*, 6 September 2019) <<https://ohrh.law.ox.ac.uk/the-human-rights-implications-of-chinas-social-credit-system/#:~:text=Freedom%20of%20movement%20is%20not%20constitutionally%20guaranteed%2C%20and,available%20to%20children%20contingent%20on%20their%20parents%E2%80%9999%20scores>> accessed 25 August 2024.

international standards, particularly regarding privacy, freedom of speech, and family rights.³⁶ The extensive reach of the Social Credit System, along with insufficient data protection measures, highlights a profound conflict between state authority and individual rights, raising further concerns about the potential for abuse and overreach.³⁷

While China's Social Credit System aims to enhance trust and enforce compliance, it must navigate the complex interplay of regulatory effectiveness and respect for fundamental rights.³⁸ Addressing these challenges will be crucial for ensuring that the system fulfils its intended goals without undermining core civil liberties.³⁹

Bibliography

- 'China steps up social credit system for financial market' (*Global Times*, 19 March 2022)<<https://www.globaltimes.cn/page/202203/1257134.shtml>> accessed 20 August 2024.
- 'Chinese Corporate Social Credit System (CSCS)-PwC China Compass' (*PwC*, 15 February 2021) <<https://www.pwc.de/en/international-markets/german-business-groups/china-business-group/chinese-corporate-social-credit-system-cscs.html>> accessed 19 August 2024.
- 'Constitution of the People's Republic of China. The State Council The People's Republic of China' (2019) article 35.
- 'Constitution of the People's Republic of China. The State Council The People's Republic of China' (2019) article 40.
- 'Constitution of the People's Republic of China. The State Council The People's Republic of China' (2019) article 49.
- 'Credit China' (*Credit China*, 2024)<<https://www.creditchina.gov.cn/csxynew/?navPage=12>> accessed 20 August 2024.
- 'Further Improving Systems for Restraining the Untrustworthy and Building Mechanisms for Building Creditworthiness that have long term Effect' (*General Office of the State Council*, 18 December 2020) <https://www.gov.cn/zhengce/content/2020-12/18/content_5570954.htm> accessed 19 August 2024.
- Frank N. Pieke and Bert Hofman, 'PC Futures: The New Era of Socialism with Chinese Characteristics' (*C. National University of Singapore Press*, 7 September 2022)<<https://doi.org/10.56159/eai.52060>> accessed 20 August 2024.
- General Office of the State Council, 'Notice of the General Office of the National Development and Reform Commission on Advancing and Utilizing the Results of Comprehensive Public credit Appraisals of Market Entities' (2019) 885.

³⁶ *ibid.*

³⁷ *ibid.*

³⁸ Jessica Reilly, Muyao Lyu, and Megan Robertson. (2021, March 30). China's Social Credit System: Speculation vs. Reality. *The Diplomat*. China's Social Credit System: Speculation vs. Reality – The Diplomat.

³⁹ *ibid.*

‘Guiding Opinions on Strengthening and Regulating Efforts on the Management of Lists of Persons Receiving Efforts on the Management of List of Persons Receiving Joint Incentives for Trustworthiness or Joint Punishment for Untrustworthiness’ (*China Law Translate*, 23 March 2018) <<https://www.chinalawtranslate.com/en/guiding-opinions-on-strengthening-and-regulating-efforts-on-the-management-of-lists-of-persons-receiving-joint-incentives-for-trustworthiness-or-joint-punishment-for-untrustworthiness/>> accessed 17 August 2024.

International Covenant on Civil and Political Rights (adopted 16 December 1966, entered into force 23 March 1976) 999 UNTS 171 (ICCPR) article 19 para 3.

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Kristina Kironska and Richard Q. Turcsanyi, ‘Contemporary China: A New Superpower?’ (*Routledge*, 18 August 2023) <<https://doi.org/10.4324/9781003350064>> accessed 24 August 2024.

‘National Catalog of Basic Public Credit Information’ (*China Law Translate*, 14 July 2021) <<https://www.chinalawtranslate.com/en/public-credit-information-list/>> accessed 19 August 2024.

‘Several Provisions of the Supreme People’s Court on Restricting High Spending by Persons Subject to Enforcement’ (*Supreme People’s Court*, 17 May 2010) <<https://www.court.gov.cn/shenpan-xiangqing-1650.html>> accessed 17 August 2024.

S. R. Hoffman, ‘Programming China: the Communist Party’s autonomic approach to managing state security’ (*Political Science*, 2017) <<https://eprints.nottingham.ac.uk/48547/>> accessed 25 August 2024.

Vincent Brussee, ‘Social credit: The Warning States of China’s Emerging Data Empire’ (*Palgrave Macmillan*, 2023) <<https://link.springer.com/book/10.1007/978-981-99-2189-8>> accessed 25 August 2024.

Vrinda Vinayak, ‘The Human Rights Implications of China’s Social Credit System’ (*Oxford Human Rights Hub*, 6 September 2019) <<https://ohrh.law.ox.ac.uk/the-human-rights-implications-of-chinas-social-credit-system/#:~:text=Freedom%20of%20movement%20is%20not%20constitutionally%20guaranteed%2C%20and,available%20to%20children%20contingent%20on%20their%20parents%E2%80%99%20scores>> accessed 25 August 2024.

Zeyi Zang, ‘China just announced a new social credit law. Here’s what it means’ (*MIT Technology Review*, 22 November 2022) <<https://www.technologyreview.com/2022/11/22/1063605/china-announced-a-new-social-credit-law-what-does-it-mean/>> accessed 25 August 2024.