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Dangerous, Yet Not So Unique. Characteristics of the Chinese Social Credit System

Abstract: Since 2015, the Social Credit System – an initiative of the government of the People’s Republic of China which aims to strengthen trustworthiness of the business entities and citizens, promote obedience to law and customs, and develop the Communist Party of China’s control over social trends and potential threats to the political stability – has been attracting worldwide attention. International media portrays the System as a mechanism which leads China to totalitarianism and destroys hope for development of the Chinese democratic movement. Therefore, interests of both sides, the West and China, are seen as contradictory. Harmful beliefs like the one that Chinese still export products of poor quality and on the Chinese side that the Western ideals lead to demoralization are common thanks to some sort of Occidental and Oriental propaganda. That is why it is necessary to compile and analyze the known facts regarding the Social Credit System, which in contrast to the media narration turns out to be a tool with interesting capabilities, not necessarily contradictory to the other major civilizations’ values.

Keywords: *China, Social Credit System, surveillance, trustworthiness, reputation, blacklist, scoring*

The People’s Republic of China, an East Asian unitary state established in 1949 and recognized by almost all of the independent countries as the sole representative of the Chinese nation, is also called a “perfect dictatorship” (Yang, 2019). One of the programmes which makes the world label the Republic as an autocracy is the Social Credit System (shehui xinyong tixi), announced in 2014 by the State Council – Chinese government (Creemers, 2014). According to the Chinese ruling elites, the System is predicted to be fully operational and cover all of the Chinese citizens in 2020, but our knowledge on the progresses in the field of development and implementation of the System is still insufficient.

Social Credit System (SCS) is a network of trustworthiness control mechanisms based on surveillance, documentation, punishments and rewards for natural and juridical persons.

A multiplicity of unknowns concerning the level of advancement of this programme, its algorithms and legal, moral and technological basis is the reason for which the assumptions surrounding the SCS' assumptions is often based on fear, hostility and disinformation. Due to the scale of this initiative (population of China, which is planned to be covered by the SCS, is 1,4 billion people) there is a need to make a detailed examination of its basis, structure, social reception and possible threats that it poses to the freedom, trust and security of the Chinese people. Despite attracting the attention of the scientific world, the SCS is often being presented in a form of dangerous simplification. The basic mistake is perceiving the SCS as one, monolithic government programme. Recipients of such incomplete media visions may believe that in 2020 China will become a country like North Korea and Orwellian Oceania, an apparatus with the ability to interfere in the thoughts and everyday behavior of citizens. Meanwhile, the „ecosystem” of social trust in many places remains in a pilot form, without nationwide regulations, and this is mainly the case in more economically and technologically developed provinces.

The descriptive purpose of this work is to compile information about the SCS, its political and economic foundations and impact on China, while the explanatory goals are to compare the SCS with the other countries' initiatives, to answer the question whether this initiative is characteristic only in the Chinese reality or can be applied in other forms outside the Sinosphere and to explain the concept of justice in the Chinese society. This publication may serve as a basis for further exploration of the System in terms of its technological architecture, historical counterparts, and cooperation of political elites with the private sector. Normative assessments and attempts to predict the effects of implementing the initiative do not occur in this text.

To prepare this work I used English and Polish sources, both primary (legal acts, scientific publications or analysis of reports of governmental and non-governmental organizations) and secondary (press articles, historical novels or document bases). Such a broad spectrum, based on the perception of governments, press, scientists, and activists, allows avoiding subjective perception of the of the Social Credit System, explaining the fear of it and determination in its implementation. The source materials dates from 2009 to 2019 – the period that began with the scandals related to the socio-economic security of the Chinese and which ended with a significant increase in Western interest in the development of the SCS.

From the „Reputation Society” to the „Reputation State”

What is the real difference between the Chinese and Western methods of controlling society? As it will be shown in this article, it is very difficult to identify the absolutely different elements of the policies of both political centers. That is why I believe that the best definitions of both standards are the formulations used in the analysis of the European University Institute: reputation society and reputation state. What are these models based on? Are their assumptions incompatible?

The reputation society, based on the cited analysis and other research work (Dellarocas, 2011, p. 4; Dai, 2018, p. 6–7) is a society that uses systems of reputation and evaluation of its members in various respects. This type of society uses such systems because they are associated with a simple division of citizens into groups of good or bad, filtering the content surrounding the unit in terms of quality, facilitating the grouping of people depending on common interests or advantages, and building a sense of identity of group members with similar assessment criteria. Such a society is decentralized in terms of evaluation systems. It is easy to notice this element in Western countries, where citizens build their reputation on many social networks and trading platforms, which are not controlled by the state. The advantages of such a model of social discipline are obvious: people providing services try to do it at the highest level and be reliable, enterprises can easier and faster examine clients' preferences for a given product, social media users limit the publication of offensive to other content, etc. However, professor Xin Dai (Ocean University of China) points out four potential threats resulting from this state of affairs: danger of collecting and disclosing information by unwanted persons, market reputation susceptibility to manipulation and commissioned opinions, monopolistic and anti-competitive tendencies of some entities and uneven occurrence reputation systems in various market fields (Dai, 2018, p. 8–9). An additional factor that may prove embarrassing for the development of society is the increasing importance of competition and security of one's own image, which in extreme cases may lead to reluctance to cooperate and making their activities dependent on the current bonus system. In view of all these concerns, it is worth examining the second model of the evaluation system, namely the reputation state.

Reputation society has been present in the People's Republic of China since the beginning of the 21st century. Over the last decades, today's powerful service platforms began to operate and experiment with the implementation of the user rating system, based on the then small credit databases to embrace the extremely intensive development of the Chinese information society. The authorities in Beijing conducted research on the possibilities of checking the credibility of citizens, and then supported the pilot versions of point systems in Suining, Rongcheng and other Chinese cities. The breakthrough in 2013-2014, related to the announcement of the construction of a nationwide SCS, was the beginning of the transition from the society of reputation to the reputation state. As indicated by experts from the European University Institute, such a system is characterized by a greater degree of state interventionism in collecting information about citizens and establishing and implementing principles generally valid in the state, as well as going beyond the acquisition of credit data only (Mac Sithigh & Siems, 2019, p. 16). This means that the state of reputation is a more centralized and forced model, and it adds to the existing competences of the authorities the right to set mechanisms praising and penalizing specific activities of members of society, regardless of their level of importance. The 2010-2020 decade, during which the PRC has to transform its initial social trust projects to a complete system, covering almost one and a half billion Chinese citizens, is unique in terms of technological and legal government

involvement. At the same time, dilemmas related to the difficulty of implementing the System's assumptions and the lack of regulation of some problems show that it is far from being completed. Should the reputation state be treated as the next stage in the development of the information society, or as an equivalent model to the reputation society, and is it possible to use the practices of two civilization circles – Western and Chinese – in developing the best solution to the problems of modern information society?

The answer to this question is associated with a much more complicated issue, namely: can a democratic society use the modified mechanisms developed by the authoritarian state and, above all, should it use them? I did not extend this question to the reverse case deliberately, because the use of legal, technological and economic gains of the Western world by the People's Republic China and other undemocratic regimes is a fact, and the reason why the West is unable to respond to the growth of the position of this authoritarian group. However, the efficiency of using these gains is disputed and could be increased by the partial democratization of certain sectors of social activity. Coming back to the question asked, I believe that it is fundamental to the ethics of democratic communities. Despite the growing criticism of the PRC policies, related primarily to the development of the SCS, a more thorough analysis of its mechanisms and similarities between this initiative and Western solutions can only bring benefits in my opinion. This will benefit quality of regulation of the activities of citizen assessors, the security of data collected and stored so far by private enterprises, as well as the level of knowledge of natural and legal persons working and operating in China. Transferring specific elements of the Chinese system to European, American or Australian ground is another matter. Certainly, they would have to be elements that do not interfere significantly in everyday life and are not associated with surveillance. While state scoring systems, unreliable public lists or too accurate personal data collections could be met with public opposition, a balanced and private system of black and red lists and increased state control over the arbitrariness of private entities based on reputation and user data seem to be solutions worthy of further reflection from Western governments. Threats to the health security or problems with law execution are present both in democracies and autocracies. To tackle these issues, Western countries should establish organized social credit information systems, which could replace current decentralized, uncertain model in which commercial platforms gain and sell users' data. Reputation state is in this perception the next step after the reputation society and instead of antagonizing this model, the West should create its own, civilized version of it and develop it after consultations with citizens and covering only the fields that the law enforcement agencies cannot manage.

Chinese Government's Perception of the Social Credit System

There are several reasons why the idea and experiments with the SCS cause concern. These doubts are related to, among others, an unusual approach to the privacy of citizens, and a difficulty with studying the mechanisms of the SCS – the number of regulations on which

it is based is still increasing. In addition, any analysis of documents on which the current local networks of the project are based is hampered by the fact of duality of political reality at the central and provincial levels, by which I mean the Chinese central authorities' lack of control and knowledge over the specific actions, statistics and law implementation conducted by the regional and local administrative bodies. Firstly, systemic solutions are currently being applied in the highly developed provinces, such as Shanghai or Fujian, and may prove incompatible in the territory of the poor periphery like Tibet Autonomous Region or Xinjiang Uygur Autonomous Region, which means that the latter cannot be treated as examples of future Chinese practices. Secondly, there is a very well-known problem of the Chinese administration: arbitrariness and rivalry of the provincial authorities, which conceal the actual results of their politics to satisfy the headquarters (Kamiński, 2015, p. 122). It came up along with the economic decentralization of the post-Mao era, which was needed to heal the Chinese economy, but which does not seem to be an obstacle for the central authorities despite their will to control every level of administration (Chung, 2016, p. 29).

Reasons for Implementation of the Social Credit System

Every venture concerning the security of citizens has two sources: official and unofficial. Official reasons are usually being presented as the problems concerning the society and bothering ordinary citizens. Unofficial reasons are much more complicated and touch the political questions, such as strengthening the position of the ruling elite in its clashes with the party opposition. However, it does not mean, especially when talking about the socio-political system of the People's Republic of China, that these sources are not connected. This is the case with the SCS, which, according to the assurances of the Chinese authorities, is created primarily in order to establish an „objective, fair, rational and balanced credit rating system” (Creemers, 2014) and increase the security of Chinese citizens. On the other hand, such a powerful tool enables the Chinese Communist Party to control public discourse regarding its leadership, coordinate government and market data collection and make decisions based on real-time information analysis (Hoffman, 2018). There are many official reasons for implementing the System, which shows us the perspicacity of the Chinese Communist Party. First, precise data is needed for the development of each of the areas listed in the Outline, which makes compilation of such data obvious and more acceptable. Secondly, references to the well-being of citizens, typical of Chinese legislation and preceding substantive regulations, distort the perception of the fundamental human rights system.

However, the efforts of the Chinese authorities cannot be considered unfounded. After the implementation of Deng Xiaoping's economic reforms, a desire to get rich, both on the side of the Chinese and foreign investors, contributed to the enormous corruption of Chinese officials and the problems with control of the quality of production. In addition, the vast majority of Chinese citizens had no credit rating, which made the credibility of market entities impossible to verify. Despite the efforts of the People's Bank of China and

the establishment of its Credit Reference Center in 2006, most Chinese still did not use credit systems or had a bank account, which made it difficult for banks and other financial institutions to assess customer credibility (Creemers, 2018). The climax occurred during the second term of Hu Jintao as the President of the People's Republic of China: in 2007 food produced in China caused animal poisoning and was recalled by many companies (Kruczkowska, 2007). In 2008 almost 300,000 children became ill because of melamine contained in Chinese milk (Gazeta Wyborcza, 2008). Finally, in 2009 over 600 children got poisoned with lead from the Changqing plant (Dziennik Gazeta Prawna, 2009). At the same time, Chinese society began to struggle with increasing corruption (the PRC has been ranked below 70th position of the Corruption Perception Index list since 2004). The other thing is that the "livelihood issues", e.g. affordable housing, were being pointed out as the main concern by the Chinese (Xinhua, 2011). Additionally, Chinese citizens were considered used as a cheap labor force. Because of all these pathologies, the PRC citizens began to articulate their safety needs and quality standards, to which Xi Jinping, the new President of the Republic, decided to comply since 2013. He presented the SCS as a fresh solution to the mentioned problems, despite the fact that mechanisms for controlling society were developed from the beginning of the century. In 2012, as the new Secretary General of the Communist Party of China, he announced a campaign against the corruption and the Two Centennial Objectives (the centenary of the Party and the centenary of the Republic), and in 2013 – the introduction of the SCS. However, it is worth considering what the true meaning of these impressive intentions is. As for the anti-corruption campaign, despite Xi's declared efforts, the level of corruption has not decreased – in 2014, China dropped to the 100th place on the list of the Corruption Perception Index. If one considers the fact that the Xi administration has sentenced more than a hundred thousand people for corruption (Leng & Wertime, 2015), these are not satisfactory results. This is one of the reasons why the campaign is considered necessary for Xi to weaken political fractions which oppose him and prevent the party from losing credibility and power. Two goals concern increasing the wealth of Chinese people, but at the same time they indicate the desire to empower the Chinese nation by creating numerous and strong middle class. The Great Rejuvenation of the Chinese Nation mentioned by Xi concerns, among others, the unification of China under communist rule, and thus the peaceful conquest of Taiwan, ruled by the Republic of China (China Daily, 2019). Finally, the SCS, based on the fears and slogans mentioned in this article, is being described as a manifestation of the will to limit the democratization of Chinese society because of its possibilities to control the actions of citizens subordinate them to the one and only communist party's interpretation of social trust.

Syncretism of Chinese Authorities' Actions

The State Council (the government of the People's Republic of China), headed by Li Keqiang, plays by far the most important role in the process of implementation of the SCS. It was

at the Council's initiative that the Interministerial Joint Conference for the Construction of the System was convened in 2007 (Creemers, 2018, p. 9). The State Council also issued the System Construction Outline in 2014. It is this body and its subordinate institutions that grant the modernized Unified Social Credit Code to natural and legal persons. While for individuals it is the equivalent of the Polish PESEL number, for enterprises it is a new, complex registration number, containing information about the issuing body, type of registered entity and its region (Slater, 2018). The Council and its ministries are responsible for preparing the vast majority of legal and conciliatory acts that form the basis of the entire programme: guiding and implementing opinions, regulations and memoranda of understanding. Guiding opinions are issued only by the State Council and contain the general government's objectives regarding the Social Credit System and general instructions to all ministries, commissions and levels of state administration. There we can find records about the need for comprehensive development of trust assessment in all possible workplaces, the need to develop penalties and rewards system, or the need of consolidation of the legal basis of the SCS (Daum, 2017a). Opinions regarding implementation are being published by the provincial authorities as part of the process of implementation of the assumptions of the State Council, presented in the guiding opinions - they almost do not differ in content from the central provisions, and the implementation of the orders contained in these opinions is left to local and regional authorities (Daum, 2017c). When it comes to regulations, these are legal acts containing specific provisions regarding the objectives and procedures related to the SCS. Thanks to them, we can learn about the types of rewards (e.g. optimization of the number of state inspections in the enterprise), the mode of operation of public administration (e.g. checking credit profiles for transfers of use of state lands), or the compulsion to ensure an appropriate level of managing information security of citizens by individuals providing this information (Daum, 2017b).

The most intriguing and most popular type of acts forming the SCS is the memorandum of understanding. This type of agreement, according to Jarosław Sozański's „Law of Treaties,” refers to specific and topical issues in relations between the parties (Sozański, 2008). Indeed, in documents of this kind, issued jointly by several entities, e.g. ministries, there are solutions collected by the participants of negotiations and ways of implementing these solutions. There is also the issue of „common penalties”, mainly in the form of blacklists – in addition to each point of the memorandum there are assignments mentioning bodies responsible for implementation of these penalties (Daum, 2018a). Furthermore, by studying the memoranda of understanding we can discover the exact legal basis for the penalties implemented under the SCS. These discoveries confirm that the ground for current solutions was already laid in the times of Jiang Zemin and Hu Jintao, but more importantly, that the SCS is not a structure above the law and focuses on the execution of law. There is a good example of the memorandum of understanding of 2016 regarding measures against people who do not pay taxes or delay in paying them (Daum, 2016). The penalties included in this act are based on specific regulations and communiques of central authorities issued in the 1990s

and later. The right to prevent a citizen who does not pay taxes on time before leaving the country is not something completely new – it is based on Article 44 of the People's Republic of China Act on the Administration of Tax Collection, adopted by the Standing Committee of the National People's Congress in 1992 and announced by the President of the PRC in 2001. Limiting the possibility of such a citizen to take up the position of manager or director of an enterprise results from legal changes (Company Law of the People's Republic of China, 1994), introduced in 2013 (art. 146), before the announcement of the SCS. Memoranda of Understanding are therefore the most accurate source of knowledge about the basic acts and types of punitive measures of the System and should be studied extremely carefully.

The other authority that has a real impact on the implementation and development of the SCS is the judiciary. Although the Chinese judiciary is not independent and its judgments are often the way to implement the policy of the Party's leadership, the Supreme People's Court is of great importance when it comes to the coordination and shape of the SCS. It was this central institution that announced a list of citizens who had lost their credibility through their actions and who would be subject to the first system restrictions, even before the government published the SCS Construction Outline (Cao, 2013). This was the first time that the Chinese authorities used the so-called blacklist, a mechanism that was developed and made available to all major state authorities over the years. Hundreds of lists, which can be made public at any time, contain names, surnames, identification numbers, photos and descriptions of the offenses of the citizens who, for example, has been repeatedly crossing the street on a red light, or who, despite the instructions of the aircraft crew, behaved noisy on board (Baynes, 2018). Interestingly, in 2013 Zhou Qiang, a great supporter of the rule of law and reduction of influence of local politicians on the courts, was elected President of the Supreme People's Court. The court under his leadership dealt with the development of higher penalties for persons acting against minors and those who trade and publish confidential information. At the same time, however, trials and court investigations during Zhou's term have reached a new level of „transparency“. In 2014, the National Trial Information System was established. In 2015, the central judiciary began cooperation with the Alibaba group credit assessment programme – Sesame Credit. Thanks to this, the Court can share data collected by the state in exchange for help in enforcing its judgments and penalties from blacklists on recipients of the Ant Financial services (within the Alibaba Group). As we can see, confidential information to which the Supreme People's Court has access is used to strengthen the SCS. In connection with the development of the so-called „smart courts“ in some Chinese cities, lawsuits have become feasible on the Internet, and in addition they are being broadcasted live (Ko, 2019).

Despite the formal separation of powers, all state organs of the PRC are completely subordinated to the Communist Party of China - the significance of these bodies and their activities depend on the current political situation at the top of the party hierarchy. The National People's Congress, its Standing Committee (responsible for interpretation of the constitution) and the People's Political Consultative Conference of China, the consultative

body of the Assembly, all represent the legislative authority, theoretically the one with the highest political position and responsible for selection and appointment of most of the important officials in the country. However, when it comes to the SCS, the legislature did not take any major initiatives and focused on debates and amendment proposals (Cui, 2019) and even the introduction of the latter to the executive branch is uncertain. Exemplary draft amendments concern increasing the transparency of the SCS, giving citizens the opportunity to appeal and restore their credit or improving updates of system data, currently blocked by delays and geographical distances (Knight, 2018). According to some studies, these procedures are partly included in the existing sets of regulations, however a visible desire to develop the mentioned mechanisms may mean that the current solutions are insufficient (Mac Sithigh & Siems, 2019, pp. 13–14).

Dichotomy of Provincial and Central Administration

The dualism of power is a unique element of Chinese social reality. It can be seen in relations between law and politics (as I have mentioned, the SCS was created also for political reasons and in complex political situation), state offices and party offices (in China it is a common situation that the Communist Party officials have more influence than their civil service counterparts), and most importantly, provincial and central authorities. All three axes are interrelated: the ruthless hierarchical system in the Chinese Communist Party means that lower-level party and civilian officials often overstate production or environmental statistics as part of the struggle for promotion in the power structure (Kamiński, 2015, p. 122). This phenomenon is one of the basic difficulties in implementing climate or anti-corruption policies (Kozieł, 2019), this distorting of reality at the local level that Li Keqiang, the Prime Minister of the PRC, admitted that statistics of Chinese provinces should not be trusted (Orange, 2018). It is possible that this is the reason for the gradual development of the System on the basis of local pilots and experiments in cities of different provinces – a powerful system introduced too quickly would be inefficient due to problems with data. There is a fear that due to the dichotomy of the authorities, the implementation of the programme at the national level will be significantly slowed down, but it is rather unfounded – the provincial authorities' sluggishness and their reluctance to provide real data to Beijing is another reason for faster introduction of the credibility checking and social monitoring system.

Organization of the Social Credit System

Such a large state initiative as the SCS requires not only special legal basis and cooperation of the three powers. Supervision and assessment of over a billion people forces the Chinese Communist Party to reach for unique technical solutions, invest in countless tools to control everyday life and cooperate with private or rather cryptostate companies. Examination of the organizational structure of the SCS allows us to partially understand its chaotic nature,

including tools that are often viewed as ordinary elements of modern existence, both in China and the Western world.

Geographic Development of the System's Jurisdiction

According to the Mercator Institute for China Studies (MERICS), the first wave of SCS-related experiments took place in August 2015 in the provinces of Shandong, Liaoning, Jiangsu, Sichuan, Anhui and Zhejiang (Ohlberg et al., 2018, p. 3), and in April 2016, the scope of pilot local systems expanded to include locations in the provinces of Hubei, Henan, Shanghai, Beijing, Guangdong, Fujian, Heilongjiang and Inner Mongolia. Since then, according to the information on the government Credit China website, prototype installations and regulations regarding various types of credit systems and public trust have also appeared in the provinces of Jiangxi, Shanxi and Jilin (Credit China, 2019). The development of the project in Manchuria and Inner Mongolia is a sign of the Chinese authorities' determination to expand its coverage to larger and less populated provinces, where due to ethnic and cultural differences, as well as the threat of separatism, monitoring of residents is developed on an unprecedented scale, which for China's Communist Party is much more important than developing the local branches of the SCS. Similarly, another interesting issue is that the jurisdiction of the SCS may reach beyond the PRC and the Chinese - there is a risk that Western companies will have to adapt to the SCS' and CCP's policies in order to remain on the Chinese market (Munro, 2018).

Technical elements of the Social Credit System

Dang'an and Social Credit System. Collection of citizens' data has been practiced by the authorities of the People's Republic of China since the Mao Zedong era-the basic system set up for this purpose is dang'an (in Mandarin Chinese: archive, record). Paper dang'an are personal files of Chinese people, containing their photos, detailed data on their behavior, their characteristics and documentation of their career and learning. There are two copies of the file, one is kept by the local Public Security Bureau and the other by the authorities of the work unit to which the citizen belongs. Whenever a school or workplace changes, dang'an is moved to the new location. This system creates good conditions for public surveillance and for monitoring legitimacy, however, the form of personal files has not been properly disseminated among the population, and additionally it is burdensome when it comes to quick decision-making. Therefore, the Chinese authorities are making efforts to digitize the information collected in this way so far, which will certainly contribute to the development of the SCS databases (Walton, 2001, p. 19).

Monitoring of the Chinese society. Chinese monitoring is carried out through special cameras, which are equipped with a facial recognition system and provide the control panel with an image on which individual units are marked with identification numbers. These

data allow system to match the right people to their detailed files, which makes it easier for authorities to reprimand them or check their current activities. Despite the security reasons declared by the Chinese government, some forms and applications of the monitoring network raise doubts, such as the construction of surveillance drones with the appearance and movements of pigeons (Zhou, 2018). The residents' behaviors registered by the SCS and the Integrated Joint Operations Platform in Xinjiang are used to create public „lists of shame” with pictures of people committing offenses and are intended to increase a sense of responsibility for their conduct. Therefore, beyond control, monitoring fulfils the role of an additional data source for entities coordinating the SCS. According to the IHS Markit analysis of 2017, the number of such cameras installed in People's China by 2020 is expected to increase from 176 to 626 million (Hersey, 2017).

Social scoring. The scoring system became notorious in 2010, when in the Suining district of Jiangsu province Chinese authorities conducted an experiment to assess citizens' behaviors and give them appropriate social categories based on these behaviors. The initiative was described by citizens and media as a failure, mainly because of arbitrary scoring rules and similarities with the Japanese „good citizen” programme from the period of occupation, which also introduced the strict distinction between the good and bad actions and people (Udemans, 2018). In subsequent scoring projects, unpleasant experiences were considered and an attempt was made to make the systems more sustainable and transparent. The example of Rongcheng in Shandong Province shows us, that this strategy has been so successful that city residents have created offenses catalogues appropriate for schools or hospitals (Daum, 2019). The reason the point system was well received in Rongcheng is the improvement of the penalties and rewards – the rules of granting the points to citizens are clearly defined and related to law violations, not indefinite inadvertence. Another noteworthy initiative is the Honest Shanghai application, which is based on government data and awards points to users and whose innovation is the lack of penalties for a low score (Schmitz, 2017).

In some cities, to restore a good scoring one has to give a specific amount of money to charity (Arsene, 2018), however, this method may raise doubts about the final recipients of funds from such a source and equality between poorer and richer citizens. It is also difficult to imagine how the unification of point systems into one network can take place on similar principles. Finally, there is the possibility that Jeremy Daum pointed out – point systems may be only propaganda experiments (especially since they do not have a major impact on life in the cities studied) (Daum, 2019), while the blacklists are meant to be the real means of control (Gan, 2019).

Black lists, red lists, irregularity lists. A very controversial element of the SCS are the so-called black and red lists. The blacklist mechanism, just like scoring systems, is designed to force PRC citizens to behave properly in all possible areas of social life and to punish those who act unlawfully and are not trustworthy. In this regard, ministries, major companies and the Supreme People's Court publish their black lists. As Rogier Creemers pointed out during the SMC050 “China, China, China...” conference, it is the Court's blacklist that is the most

burdensome. On the other hand, it contains the names of citizens who not only broke the law, but are also delaying the execution of the court's judgment, so this is not a collection of random or unaware people. It is the penalties intended for those present on this list that are most often cited in discussions on the SCS. Prohibitions of traveling by plane (for smoking cigarettes on board), buying first-class seats on a train (for traveling with an invalid ticket), or becoming a director of an enterprise are based on the conviction that a person who has the means and time to use such opportunities certainly has the means and time also to fulfil the court judgment (Creemers, 2018). Blacklists are also published as part of local initiatives (e.g. in Dezhou, Shandong Province), which indicates the popularity of the solution (Cho, 2017). An element that is relatively less present in the regulations and media is the irregularities lists, which seem to be some kind of preliminary black lists – companies and individuals who figures on them receive specific warnings that in the case of further misbehaviors they will be charged with blacklist punishments (AHK China, 2019; Boquen, 2020).

Red Lists are elements of the SCS mechanism which reward citizens who are role models. According to one of the memoranda issued by the People's Bank of China and the Chinese Regulatory Commission on Banks, regarding entities operating in charitable and poor organizations, possible awards are, among others, tax breaks, financial help with organizing a wedding or funeral, a better position in the process of adopting a child and tips on implementing government projects (Daum, 2015). These are not material awards, but procedural ones, useful in a country with a bureaucratic tradition.

Realization of the System's Roadmap

The People's Republic of China, despite the implementation of economic reforms and market liberalization conducted in the 1980s, retained the typical communist features of administration and planning of political and economic initiatives. Such formula is visible also in the case of the SCS, was officially announced by the PRC State Council on June 14, 2014 in the Outline of the Construction of the Social Credit System for 2014-2020. International media did not publish this information until the beginning of 2015 (Business Wire, 2015), which may result from both keeping the topic secret (perhaps due to the caution of the People's Republic government) and the lack of interest from the international community (unaware of the importance of the project). In any case, the subsequent years of inquiries into the shape, basis and importance of the SCS have resulted in the translation of Chinese law databases in this respect (Jeremy Daum's China Law Translate project), analysis of control mechanisms (Rogier Creemers) or sociological research (Genia Kostka). We do not have any information about peripheral regions such as Xinjiang and Tibet, especially since their supervision is already extremely detailed, and for surveillance of communities that may, according to the Chinese government, threaten stability in the country, forced re-education and special measures have been used for a long time. The Integrated Joint Operations Platform, which is the headquarters for informers from the Xinjiang region, has been called

the „monitoring system of social trust” (Xiao, 2019). The Platform is an initiative which takes the monitoring in Xinjiang to new heights and can be treated as a typical totalitarian surveillance apparatus. Its formation may explain the phenomenon of testing the elements of the SCS almost exclusively in the provinces located within the so-called Proper China. In poorer and ethnically separate regions, such as Xinjiang, the government wants, beyond the control of credibility and the rule of law, to exercise real supervision over the behavior of citizens of Uyghur origin, considered as elements threatening the stability of party power. Another problem may be the issue of dichotomy of policy implementation by central and local authorities. The deadline for the completion of work on the SCS, anticipated from the beginning for 2020, may therefore encounter difficulties. For now, no breakthrough steps can be seen in the field of unification of various programme models, there is also little information about the state of its infrastructure in locations other than those selected for testing. Since 2018, some press agencies have been informing that the construction of the nationwide SCS will be complete not in 2020, but in 2021, and the originally planned date is meant for the capital of the PRC (Gorey, 2018). This is likely because of the reasons given earlier, and also because of the possible willingness by the Chinese government to check the integrated system network on a smaller scale initially. At the same time, the postponed date will coincide with the main goal of the Chinese Communist Party’s centenary – the completion of the „xiaokang (moderately prosperous) society”. Since such a society is not only aiming at achieving the economic strength and middle-class enlargement, but also some level of social cohesion and sustainable development (Ross, 2013), there can be no tolerance to the irresponsible people and companies, who pose a threat to the social trust and do not obey by the legal regulations. In this way of thinking, the SCS is a great tool to prevent the actions that can lead to disruption of the sustainable development, ecology, social integrity and other moderate elements of the xiaokang society. The SCS also corresponds with almost every one of the Core Socialist Values, presented by the Communist Party of China in 2012. These Values reflects in fact the basic elements that have to be provided in order to create the moderately prosperous society. Prosperity, civility, harmony, equality, justice, rule of law, patriotism, dedication, integrity and friendship can also be easily linked to the SCS assumptions, although it is difficult to say the same about the last two Values – freedom and democracy, limited by the control mechanisms and strict legal and moral expectations, guarded and executed by the authorities.

Although in recent time the SCS elements has been visible in practice, it is doubtful that in 2020 there will be any major reform merging the multiple social credit methods and practices used by the state administration, private companies, self-governments etc. One of the examples of such new elements is the planned implementation of the social credit scheme in the field of cheating university students – such students may be stripped of access to mortgages and public transport or speed Internet connection (Dean, 2020). Another project, called Suishen Code and launched in Shanghai, is related to the COVID-19 pandemic and focuses on using the colored QR codes of the citizens, earlier needed for

the medical purposes. One of these was the information which citizens are free to move about Shanghai and which have to be quarantined for 7 or 14 days: the first category was granted a green code and the latter two – yellow and red codes. Since the Chinese government largely manages to decrease the number of coronavirus' victims, Shanghai authorities decided to use the aforementioned codes “as proof of the personal identification” even when the citizens conduct actions not related to the coronavirus, like going to the swimming pool, to the theatre or the library (Shen, 2020). Social scoring initiatives are also gaining popularity in the eyes of Chinese local administration: the city of Suzhou for example created the Suzhou Civility Code, which for now is voluntarily and which increase or decrease one's personal rating depending on the citizen's action which improve the community (e.g. by helping the elders and charity) or which are condemned by the law (e.g. assaulting women and jaywalking) (Chiu, 2020). The most interesting initiative related to the SCS is probably its adaptation to the economic problems caused by the COVID-19 outbreak. Thanks to the SCS mechanisms, individuals and companies who in one way or another contribute to the bad epidemic situation, e.g. by selling fake medical equipment, selling the overpriced medicaments or non-complying with the restrictions, are subjected to punishments resembling those from the black lists. On the other hand, natural and legal persons contributing to fight with the pandemic (e.g. by sending or paying medical volunteers) can count on some advantages, like being placed on the red list. One more important thing is that due to the epidemic situation, some companies' bad social credit ratings may be temporarily hidden from the public social credit lists or raised if those companies prove that their difficult situation is caused mainly by the coronavirus pandemic (Gigler & Kang, 2020). Such solution shows that the Chinese authorities' goal is to re-establish the healthy economic situation and that the SCS is used in order to ensure the private sector's engagement in battling the pandemic.

Western Similarities and Oriental Aspirations – An Opportunity or a Danger?

The dangers arising from building Western communities' approach to the SCS on fear of its „totalitarian” character include, among others, discouraging the residents of the West from examining the SCS in terms of the usefulness, ignoring the significance of differences between civilizations, and above all – distracting citizens from problems with data occurring in their own countries. Meanwhile, in their analysis, Daithí Mac Sithigh and Mathias Siems from the European University Institute prove that many solutions commonly used in the West are based on similar principles as the SCS, and also suggest undertaking detailed studies on this project (Mac Sithigh & Siems, 2019, p. 29–30). Studying the similarities of systems from different civilization circles may contribute to the discovery of a compromise way of modification of the legal models of states in order to develop the information security and protect the rule of law.

Common Dilemmas of Different Reputation Systems

Scoring systems in China seem to some observers a novel tool to further constrain human dignity and freedom. It should be remembered, however, that scoring have accompanied civilizations since the dawn of time as a convenient method of comparing the performance of various individuals, checking their knowledge or regulating public entertainment. Today, scoring accompanies citizens, even in the form of penalty points for unlawful driving, numerical scores in schools or reactions available on social media (think Facebook and YouTube). The essence of these systems is, as in the case of the SCS, punishment of misconduct, ostracism toward their perpetrators and rewards for attitudes recognized in the community as appropriate. Creditworthiness profiles created on the basis of such scoring, in popular opinion associated with China, are also widely used in Western countries (Mac Sithigh & Siems, 2019, p. 9). Examples of companies using such practices include German Schufa, American Tala, Singaporean Lenddo, Australian Trustbond and Polish Credit Information Bureau (Biuro Informacji Kredytowej), but also eight Chinese companies, which obtained permissions for creating provisional versions of the social credit systems from the People's Bank of China and since 2018 act under Baihang Credit, a group coordinated by the state authorities (Koetse, 2018).

Table

Element	Schufa	Tala	Lenddo	Equifax	Trustbond	Biuro Informacji Kredytowej	Baihang Credit companies
Exchange of data with the public authorities	No	No	No	Yes	No	Yes	Yes
Blacklists & redlists	No	No	No	No	No	No	Yes
Use of non-traditional data (e.g. social media, contact lists, digital trails)	No	Yes	Yes	Yes	Yes	No	Yes
Public availability of the „untrustworthy” users’ data (e.g. debtors)	Yes	No	Yes	No	No	Yes	Yes
Cooperation with foreign credit systems	Yes	No	No	Yes	No	Yes	No
Scoring	Yes	Yes	Yes	Yes	Yes	Yes	Yes

Comparison of basic elements of main credit information companies

As we can see, the companies from the Baihang Credit group are in some aspects similar to their Western counterparts. In fact, the main factor that accounts for the uniqueness of the SCS is the element of blacklists and redlists: while in the other systems the only “reward” is

a better chance to get a credit and the only “punishment” is a problem with getting a loan, in the Chinese version we see a special connection between the credit systems of multiple companies and other services provided by them. If a person has a low credit score or commits a crime included on the blacklist, his or her access to some of the company features may be limited and if he or she behaves properly, the access can be extended and the profile can be upgraded. What makes the SCS special is also its diversified nature: it is still under construction, it is designed not only for credit rating but for wider trustworthiness development and its final form is planned to be supervised by the state only, just like the Chinese want it to be (Kostka, 2018, p. 22).

Scoring based on user’s input or “various sources of information” allows other users and enterprises themselves to value an entity’s credibility. What’s more, thanks to agreements between scoring agents from different countries, a given person appears in databases even after permanent emigration to another country (Kisiel, 2015). Ignoring such facts comes with ignorance or omission of the constant development of Chinese point systems in the public debate, especially after the defeat of the previously discussed experiment in Suining.

Collecting and storing data is another common element of both types of systems. Both Western and Chinese private entities collect large amounts of data from their users. Both Facebook and Ant Financial, in addition to assessing users based on certain algorithms, use data on physical appearance, activity history, contact details, and have access to various functions of customers’ smartphones, etc. These data are invaluable to them, which is related to the overall increase of the importance and value of information as good. Thanks to these data, they can develop the level of their services, study social trends, promote initiatives they support, shape public discourse, tailor advertising or offers to the needs of clients, as well as influence great politics. While in the case of Chinese realities, it is obvious that enterprises collecting data from citizens are associated with the government’s policy (on the example of the SCS), until recently Western entities were considered independent and able to face the state authorities over the issue of protection of the rights and privacy of their members. The biggest blow this vision received was the scandal related to the possession of data by tens of millions of Facebook users by Cambridge Analytica, a company that used a simple application that uses information from both the profiles of those who downloaded it and their “friends” (Cadwalladr & Graham-Harrison, 2018). In addition, some trickery of unaware Internet users allowed the application to access their tables, timelines and private messages. The whole thing was a compromise on Facebook data protection and the reason for deep reflection on private companies’ privacy guarantees. Considering this and other cases of threat to information security in the West, one may wonder whether the privacy of citizens suffers more through similar uncontrolled data leaks or through systematized, comprehensive private-state databases like those in the People’s Republic of China. After all, private Western companies still have less data than Chinese cross-sectoral economic giants, and these data are most often associated with the specific purpose and policy of websites. In the case of the PRC, entities such as Tencent or Alibaba, thanks to agreements signed with the

city authorities or the Supreme People's Court, have access to information from almost every area of the individual's life (Kobie, 2019). Similar cooperation of a formally independent group with the government would probably be received in the West even cooler than the news of Cambridge Analytica, however, when it comes to information security, citizens' data are more closely guarded in China, on the basis of transfer to specific business entities, on agreed terms, in order to strengthen credibility. Of course, this information security is being developed in order to prevent bodies other than the government from using data of Chinese citizens and as such it does not mean security from the state surveillance and cannot be compared to the solutions like these from the European General Data Protection Regulation, aimed at making the data collection more transparent for the citizens. The Chinese state has complete control over the flow of this data, which Western countries do not have in the face of the activity of independent service powers. In this difficult dilemma, the question should be asked who should be trusted more: the state or the private sector?

The last of the most important problems faced by Eastern and Western societies is monitoring. In the case of Western countries, the proportions regarding it are more balanced than the planned 2 Chinese citizens per camera (7 citizens per camera in the United States and over 13 citizens per camera in the United Kingdom), however, there is a problem of finding out who is the owner of non-state cameras, as well as the lack of appropriate regulations regarding the granting of the possibility for natural and legal persons to install monitoring (Panoptykon Foundation, 2014, p. 3). In addition, the issues of limiting freedom and privacy, unnecessary costs borne by the society for maintaining the good condition of cameras, as well as awareness of their low effectiveness in reducing the level of crime are important. Similarly, big doubts apply to face recognition technology – in May San Francisco, the headquarters of many technology giants, announced a departure from this type of monitoring because of violation of privacy connected to it. City authorities considered too extensive community monitoring capabilities of the police to be a threat to democratic governance (Conger et al., 2019). This problem is also present in other Western countries: in Australia, the use of such cameras by the border guards and the police in public places raises concerns of scientists who question the effectiveness of such methods, worry about the privacy of citizens, and above all pay attention to the “freezing effect” of surveillance, which exerts psychological pressure on residents and harms natural behavior. Interesting fact raised by researchers is that the effectiveness of face recognition technology is low – efficiency of 1 to 3 recognized persons out of 10 observed, and additionally problems with recognizing people of different skin colors and different sexes is certainly not enough in the process of strengthening the security of citizens (Turner, 2019). The example of the Commonwealth of Australia is particularly important from the point of view of the discourse on the Social Credit System, because de-sensing citizens' behavior and depriving them of their right to privacy are the most serious allegations made by the international media against this initiative. Another issue when it comes to monitoring in the West is the question of excess CCTV cameras. This phenomenon is most clearly seen in the United

Kingdom, where specialists note the significant advantage of the number of monitoring devices in Great Britain over those installed in continental Europe, and also warn the public against moving toward greater, not necessarily useful and cost-effective state surveillance (BBC, 2015). Germany, which has experienced mass surveillance in its history during the Third Reich and the German Democratic Republic, is also experiencing a crisis of efficiency of the social monitoring. Conducting tests of face recognition technology by the German authorities (primarily by the Ministry of the Interior) faces resistance from communities dealing with personal data protection and privacy. The main reasons for this are the lack of access to information about the details of government programmes regarding the development of social control (both the government and entities cooperating with it are shunned), as well as the planned designation of monitored persons, which involves scanning the faces of citizens (Delcker, 2019). Such practice is associated with the weakening of the right to privacy. In connection with the aforementioned creditworthiness assessment systems, monitoring in Western countries (especially when it is enriched with the ability to recognize the faces of individuals) is even more reminiscent of Chinese practices mentioned earlier. The latter are of course much more advanced and the chance for a democratic control over them is even smaller than in Western countries. In China, facial recognition technology is used on a massive scale to identify certain people faster and take appropriate action in the event of their inadvertent actions. Additionally, due to the huge population of the PRC, the authorities want to be able to recognize specific units among the crowd of other monitored people (Wang, 2018). All these facts allow us to see fundamental differences in the needs and perception of problems between Western countries and the People's Republic of China. However, part of the reality of monitoring is common to both of these civilization circles, which prompts reflection on the prevailing media interest only in the Chinese approach to the mentioned issues (with are present in the West as well).

Question of Different Approaches to Punishment

The attitude of different of countries toward the institution of punishment is of fundamental importance for the dispute over the SCS. The differences here are colossal - while in most Western countries the maximum penalty is life imprisonment, China is the undisputed leader in the field of capital punishment execution number of executions per year – according to Susan Trevaskes there are about 10,000 executions in China per year (Trevaskes, 2008, p. 394). It is worth mentioning that as a result of the liberalization of the death penalty policy, the punishment is more often pronounced with suspension of execution, which means that the convict has a two-year period during which he can save himself from loss of life by good conduct. While in the West penalties are imposed with respect for human rights, in People's China these rights depend on the fulfilment of certain civic obligations. Finally, when court judgments within the Occident are generally issued without political overtones, the advantage of party administration over state administration in the PRC makes it pos-

sible to issue judgments related to the policy and perspective of the current leadership of the Chinese Communist Party. However, the most important difference in the approach to punishment is seen in the regulations regarding the System.

To understand the motives of the Western and Chinese legislators, one should study examples of penalties in the legal systems of both parties – in this work I use models from Poland and China. The penalty of life imprisonment provided by both states, which is optional in each of them (i.e. in their legal systems there is no crime in, for which this penalty must be imposed), may be imposed in the event of various crimes. While in Poland these are acts that mainly hit the humanity, the state and the international community as a whole (e.g. genocide, violent change of the Polish political system, aggressive war), in the PRC these are primarily actions that threaten security and trust in society (e.g. trade weapons, hijacking, embezzlement). As previously described, the penalties envisaged by the SCS are based on bills and other Chinese laws that have been in force for a long time, which shows the Chinese residents and authorities' interest in security and credibility. The approach of the Polish State may result from its turbulent history (especially the experiences of the 20th century) and its commitment to protect the territorial integrity of other countries (Georgia, Ukraine), as well as to maintain peace and stability in the world (like during the UN and NATO missions). Chinese perception is certainly based on the experiences from the time of Deng Xiaoping and later leaders' rule and associated with the influx of new political and economic ideas into an incredibly developing population difficult to control. Control is the keyword here. It should be remembered that when drug or weapon trafficking is detected in Poland, Polish law enforcement authorities have access to their European databases (e.g. Europol) outside their information databases, as well as the possibility of requesting the release of a citizen of a given EU country who has committed such act on Polish territory. The People's Republic China, in which these acts are punishable by life imprisonment, can turn to Interpol for help, although cooperation on this line may be hampered by kidnapping of the Interpol President Meng Hongwei in 2018 (Chen & Wong, 2018). In terms of extradition Beijing may face resistance from countries that do not believe in integrity of the extradited person's trial, and in case of some crimes (e.g. corruption) fearing the state of human rights and security of such a person in China.

Another issue is the adequacy of the penalty. Penalties provided in the Polish Criminal Code, e.g. fine, restriction of liberty, as well as timely and life imprisonment are also used in China (of course, not always for the same offenses or in the same dimension). They perform a protective, punitive and compensatory function in both countries. So, what makes the SCS, and thus more broadly, the People's Republic of China criminal system, unique? In my opinion, it is its understanding of the adequacy of the penalty to the committed offense, resulting from the more than two thousand years of bureaucratic tradition of China, cultivated also by the People's Republic of China and from the economic condition of its inhabitants. First of all, the penalties in China have a nature of certain difficulties for citizens: in the event of non-payment of a public transport ticket, the citizen receives a temporary ban on using

it, in the case of non-payment of taxes the penalty is the inability to leave the country and when it comes to economic fraud, the state prevents the enterprise from operating on the Chinese market. Although penalties such as fines are also envisaged in Western countries for these crimes, they do not seem to be appropriate for the PRC's realities, which are based on a multi-level mixed civil-party administration, something unheard of in the liberal democracies with a clear division between party and civil service offices, and a sense of collective among the Chinese communities. Cutting off from some possibilities or goods not only means that the convicted person is treated as a second-class citizen, but also affects his relations with people, fearing for their reputation and their own access to the privileges of social credit systems. It should be remembered that, as in many countries of the former Eastern Bloc, in the People's Republic of China, granting citizens special privileges, such as the possibility of teaching abroad within the Confucius Institutes, obtaining a visa to the Schengen Area, or not having to make a deposit when renting a car, is the prerogative of local, regional and state authorities. In Western democracies, we can see rather the power of limiting such possibilities. For this reason, the advantages recognized by these authorities, such as credibility, have become more important for the Chinese people than to get rich, as in the times of Deng Xiaoping. After some time, Chinese society reached a level at which citizens began to desire higher standards of living and access to the outside world - and doors to both of these domains are guarded by the communist party. In addition, penalties depriving a citizen of the possibility of exercising privileges available to other persons may act on the potential perpetrator of an offense even more deterrent than fines common in the West, and be less costly to the state than depriving a citizen of liberty. The penalty of restriction of liberty in China would be a compromise, but it raises two problems. First, it limits the constitutional rights of a citizen and human rights, which means that its application in the case of acts of less social harm would not be commensurate. Secondly, punishments of the SCS are more closely linked to penalized activities.

It should be remembered that any research on the SCS conducted without considering the differences in community value systems and in the way public administration exercises power will be full of understatements. Similarly, it makes no sense to criticize the SCS' solutions without understanding the motives and adequacy of the penalties provided by this system. Punishments in a given society are always most strongly associated with those acts that society considers as a real threat, hence the incompatibilities in perceiving the essence of penalizing certain behaviors are understandable.

Summary

The People's Republic of China was born in the chaos of civil war and struggle against the Japanese invader, but it could also fall in chaos - this time by catastrophic economic and ideological initiatives. Deng Xiaoping, aware of the economic disaster in the PRC after the Mao era, saved the country by opening it to the world. Thanks to this, China regains its role

of great power, but to make it possible, it is necessary to control the growing ambitions and ventures of citizens eager for profit. Although the world recognizes the Chinese people as injured and enslaved, the SCS is one of the initiatives that enjoy their real recognition, unlike the hukou system or the liquidation of the Wall of Democracy from 1978-1979 (Góralczyk, 1999, p. 176–182).

A system in which punishments actually discourage people from committing crimes is desirable for every society that respects the rule of law and justice. Therefore, recognizing the reasons and grounds for the security needs and the nature of power in China, I consider the SCS to be one of the most effective solutions in the field of protection and enforcement of these ideas, and the fear of its abilities to be largely unjustified. Assessing people on the basis of their behavior and often suspicion is common also in the countries of the Euro-Atlantic civilization, problems with storage and use of data are also problems of the Western societies. In contrast, the Chinese society is subjected to an authoritarian regime whose advantage over democracy is that it allows the swift realization of the will of the authorities and the coordination of initiatives that would be difficult to accept by public opinion and political forces with different interests in pluralist model. This means that we should look for solutions acceptable to both sides of the dispute, in accordance with the expectations of citizens, with respect for their social culture and appreciation of its level of development and the strength of the institutions created so far.

The SCS is a very broad topic – the history of surveillance, cooperation between the state and companies in its construction or the perception of the Western media could be a subject of a separate research paper. Therefore, my intent was primarily to show the SCS as it really is: what the most important challenges it faces are, what functions it should perform, what it should be based on, how it is perceived by the Chinese, and what logic stands behind such a powerful undertaking, but also to prove that this initiative uses mechanisms present also in Western creditworthiness systems and values important for Western societies. It is impossible to completely examine and gather information on all these issues, which is caused by the working phase of the SCS construction, the lack of credible opinion polls in China, the multitude of credit solutions in the West, and the project's connections with the secret plans of the leadership of the Chinese Communist Party. However, this analysis is a compendium of knowledge on various aspects of the SCS, described separately and partially by other authors. It allows understanding of the SCS' regulations and structures in a broader political, economic and social context and indicates the role of the SCS as law enforcing programme. This analysis is not complete due to the mentioned vastness of the subject, as well as the number of not yet elaborated or translated Chinese sources. Finally, it facilitates work on formulating sociological theories that focus on functioning of citizens under omnipresent monitoring, the relationship between the administrative punishments and the level of crime and the differences in approach to trust systems.

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