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## **Trust is good, control is better: technopolitical visions and realities in China's social credit system**

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Chapter Four

## Model-Making

Jiangsu Province (江苏省) is a powerhouse of economic and political innovation and thought in contemporary China. Among all provinces – excluding direct-administered municipalities (直辖市) such as Beijing and Shanghai – it is the third smallest but fifth most populous, and most highly densely populated. It has the country’s highest GDP per capita and second highest in absolute terms after Guangdong. If it were a state in its own right, it would have been the 12<sup>th</sup> largest economy in the world in 2022, just shy of Brazil and just larger than both South Korea and Australia. Its wealth and stature are in no small part down to its 1,000km of geographically-advantageous coastline along the Yellow Sea, as well as its positioning within the Yangtze River Delta with Shanghai to its immediate south-east.<sup>1</sup> Historically, the province formed part of the Jiangnan region, the cradle of culture and a proto-market economy in China’s mid-imperial period.<sup>2</sup> Politically, Jiangsu has proved an important testbed for reform and experimentation. In the 1980s and 1990s, the province pioneered the rollout of “town and village enterprises” (乡镇企业), employing some 30 per cent of the rural workforce at their peak.<sup>3</sup> More recently, Xi Jinping appears to have taken a personal shine to the province, exhorting officials to “strive to be an example, strive to be a model, and lead from the very front” (争当表率、争做示范、走在前列) on all four of his tours to the province since taking office, including most recently in July 2023.<sup>4</sup> Jiangsu has become synonymous with commerce, innovation and a technocratic style of governance. Between 2017-20 – social credit’s most productive years – the provincial Party Committee was led by Lou Qinjian 娄勤俭, an archetypal technocrat of the kind described in Chapter One. Lou left for university in 1978, just one year after the reopening of higher education in

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<sup>1</sup> For detail on Jiangsu’s spatial development, see Jaros, *China’s Urban Champions* Chapter 7.

<sup>2</sup> von Spee, *China’s Southern Paradise*.

<sup>3</sup> Oi, ‘Fiscal Reform and the Economic Foundations of Local State Corporatism in China’; Naughton, *The Chinese Economy*.

<sup>4</sup> Xinhua, ‘Carry Forward the Glorious Mission of “Striving to be an Example, Striving to be a Model, and Leading from the Front”’; Xinhua, ‘Firmly Grasp the General Requirements of “Striving to be an Example, Striving to be a Model, and Leading from the Front”’.

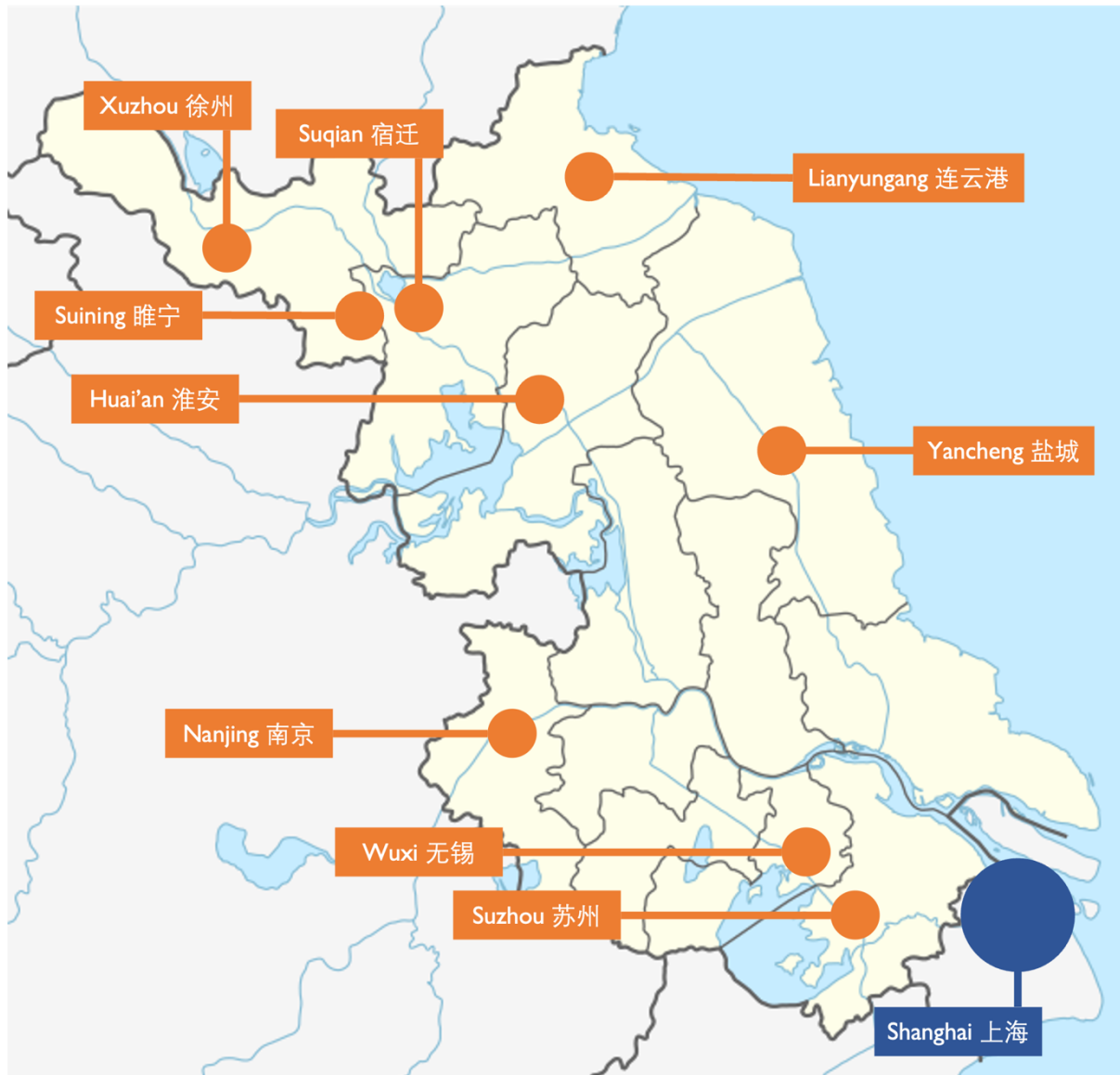


Figure 15: Map of Jiangsu Province, including key cities discussed in this chapter

the wake of the Cultural Revolution and just as “spring of science” fever was beginning to take hold. He studied computer science and engineering, eventually gaining a PhD in the subject. His career began in the Ministry of Industry and Information Technology, climbing its ranks to serve as Vice Minister between 2008-10 before then entering the murky world of provincial politics.

Perhaps unsurprisingly, Jiangsu is also home to one of the most developed provincial social credit systems. As I will describe below, the province was a very early and very eager adopter of the technology. Work began in 2004, giving it a head-start in both theoretical development and implementation. Jiangsu featured significantly in lists of early model cities and stands head-and-shoulders above other provinces in terms of social credit

documentation published (see Chapter Three). The innovations pioneered in Jiangsu, especially in social credit's earliest years before its scope had become more formalised, had a clear and undeniable influence on central planning. Its system is feted for both its depth and breadth; from a regulatory and technical standpoint, Jiangsu's social credit system permeates horizontally across government departments and vertically through every tier of administrative authority. The "Jiangsu model" (江苏模式) of social credit development is thus held up in policy circles as an example of best practice.<sup>5</sup>

The province therefore provides an excellent case study of social credit technology-making in action. In this chapter, I document the development of the system from its earliest thinking to its implementation at the local and hyper-local level. It contains three primary sections. The first explores the roots and early missteps of social credit work in Jiangsu. The second highlights the roll-out and diversity of the system between 2015-20. The third provides a brief case study of the system's adaptability in the face of new policy challenges, namely COVID-19.

## ROOTS

Social credit construction in Jiangsu predates that of almost all other provinces, beginning in the immediate wake of the system's announcement at the central level. Work commenced in November 2004 with the publication of the *Provincial Government Opinions on Accelerating the Construction of a Social Credit System* and the *Interim Measures for the Collection and Use of Public Credit Information in Jiangsu Province*.<sup>6</sup> These documents emphasised the system's focus on the market, lifting language directly from Jiang Zemin's 16<sup>th</sup> Party Congress *Work Report* to describe a system whose goal should be to promote a "unified, open, competitive and stable market system" by reducing transaction costs, optimising the investment environment and regulating economic order. They also mentioned the role of social credit in "improving moral standards and consciousness of trust across the population so as to create a harmonious social environment". The documents identified three primary goals: To establish a network of credit-related rules and regulations to act as "one safeguard" (一个保障) for the policy's rollout; to build "two systems" (两个系统) covering credit supervision (what would later evolve into joint rewards and punishments) and credit services; and to achieve improvements in the three areas (三个提高) of credit awareness among the public, commercial credit provision and trust in government institutions. Two institutions were set up to help steer these aims. Comprising 24 provincial government departments and headed

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<sup>5</sup> Wu Fuxiang, 'The Jiangsu Zhejiang Models: Path Selection and Success'; Market Information, 'What Makes the "Jiangsu Model" so Successful?'

<sup>6</sup> Jiangsu Provincial People's Government, 'Provincial Government Opinions on Accelerating the Construction of a Social Credit System'; Jiangsu Provincial People's Government, 'Interim Measures for the Collection and Use of Public Credit Information in Jiangsu Province'.

up by Executive Vice Governor Jiang Dingzhi 蒋定之, the “Provincial Social Credit System Construction Leading Small Group” (省社会信用体系建设领导小组) (hereafter, the Leading Small Group) met for the first time in 2005, issuing a work plan and committing to meet every six months to review the system’s progress.<sup>7</sup> Separately, the “Provincial Credit Office” (省信用办) was set up to coordinate social credit planning, investment and implementation. A website, “Trustworthy Jiangsu” (诚信江苏), housed credit-related information in an early example of e-government at a time when China’s national level of internet penetration stood at just 8.5 per cent.<sup>8</sup>

Progress accelerated in 2007-08, as the government published a swathe of credit-related documents. Firstly, an updated *Opinions on Accelerating the Construction of a Social Credit System* proposed a two-phased, long-term plan.<sup>9</sup> Phase one would prioritise the setup of social credit’s basic functions at the provincial level by 2010. Phase two would align Jiangsu’s credit system with international standards, adapt to the development needs of the day and raise the overall level of trustworthiness in the province, all by 2020. On a more practical level, the government issued two sets of *Interim Measures* for the management of both personal and commercial credit, as well as regulations on the setup of credit service institutions in the province.<sup>10</sup> In February 2008, the General Office of the Provincial Government issued its *Three-Year Action Plan* for social credit construction, laying out a clear policy agenda for the period through to the end of the 11<sup>th</sup> Five Year Plan.<sup>11</sup> Numerous plans fanned out from these core texts; according to reports at the time, some 50 government documents pertaining to Jiangsu’s social credit system had been published by the end of 2008.<sup>12</sup>

Collectively, these documents outline many of the characteristics we now recognise as foundational to the social credit system, but that at the time were still in theoretical development at the national level. They describe a system made up of “one network and three databases” covering corporate credit, personal data and loan information supplied by market actors, punishments for misbehaving subjects, and a reliance on devolved

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<sup>7</sup> For a list of the inaugural members of Jiangsu’s social credit Leading Small Group, see Jiangsu Provincial People’s Government, ‘Notice on the Establishment of the Provincial Leading Small Group for the Construction of a Social Credit System’. The first provincial-level social credit work plan can be seen here;

<sup>8</sup> By way of comparison, some 66.9 per cent of Japan’s population were internet-connected, and 68 per cent in the US.

<sup>9</sup> Jiangsu Provincial People’s Government, ‘Opinions on Accelerating the Construction of a Social Credit System’.

<sup>10</sup> Jiangsu Provincial People’s Government, ‘Jiangsu Province Interim Measures for Personal Credit Information Management’; Jiangsu Provincial People’s Government, ‘Jiangsu Province Interim Measures for Enterprise Credit Information Management’; Jiangsu Provincial Credit Office, ‘Notice Issuing the “Registration Measures for Credit Service Institutions in Jiangsu Province (Trial)”’.

<sup>11</sup> Jiangsu Provincial People’s Government, ‘Three-Year Action Plan for the Construction of a Social Credit System in Jiangsu Province’.

<sup>12</sup> Ministry of Commerce Department of Market Supervision, ‘Jiangsu Province Comprehensively Promotes the Construction of a Social Credit System with Remarkable Results’.

implementation.<sup>13</sup> The primary focus was still economic, but hints of a broader ideological agenda were visible; the 2007 *Opinions* link the system to the central government's *Implementation Outline for the Construction of Citizen Morality* published in 2001, highlighting its potential to “improve the public’s awareness of integrity and develop honesty and trustworthiness across the whole of society” through the development of modern credit management technologies.<sup>14</sup> Finally, they emphasise the role of piloting in the implementation and innovation of the system. The 2005 *Leading Small Group Work Plan* prioritised the establishment of city-level experiments and e-government processes to track and assess their success as part of a wider provincial development strategy.<sup>15</sup> Nanjing and Suzhou were the first locations to set up pilots, but it wasn’t long before other cities and even counties would develop their own interpretations of social credit.

### *Suining*

Social credit in the late-2000s lacked a north star. As discussed in Chapter Two and above, a handful of central and provincial authorities had attempted to define the system and its potential uses, ranging from tool in the provision of financial credit to mechanism in the routine surveillance of individuals and companies for administrative and judicial reform. This absence of a formal definition and boundaries provided scope for adaptation and experimentation according to local policy needs. Again, as discussed in Chapter Two, this was a period of considerable change in China’s policy landscape, including a renewed focus on moral governance in light of a brewing “trust crisis” – or at least perceptions thereof. Credit technologies were seen by some as a potential weapon in this battle. Early local-level tinkering in Jiangsu’s Suining County (睢宁县) would produce what became one of the most egregious and infamous instances of social credit overreach, its example cited extensively in Chinese and English literature alike.<sup>16</sup>

Suining County falls under the administration of Xuzhou City, though geographically it is far closer to the larger Suqian (see Figure 15), itself one of the first cohort of social credit model cities announced in 2017. In the late-2000s, economic growth in the county had slowed considerably and local officials found themselves facing a string of governance challenges.<sup>17</sup> In their eyes – perhaps in an attempt to shift responsibility from their own

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<sup>13</sup> Jiangsu Provincial People’s Government, ‘Provincial Government Opinions on Accelerating the Construction of a Social Credit System’.

<sup>14</sup> Jiangsu Provincial People’s Government, ‘Opinions on Accelerating the Construction of a Social Credit System’; Central Committee, ‘Implementation Outline for the Construction of Citizen Morality’.

<sup>15</sup> Jiangsu Provincial People’s Government, ‘Notice Forwarding the Provincial Leading Small Group for the Construction of a Social Credit System’s Key Points and Tasks for the Construction of Jiangsu’s Social Credit System in 2005’.

<sup>16</sup> Creemers, ‘China’s Social Credit System’; Zhang, ‘Governing (through) Trustworthiness’; Liu, ‘Multiple Social Credit Systems in China’; Mistreanu, ‘Life Inside China’s Social Credit Laboratory’.

<sup>17</sup> In 2007, Suining was the third most-populous of Jiangsu’s 52 county-level administrations, but ranked bottom in terms of GDP per capita.

mismanagement – at least part of the problem lay in local customs and culture. Showing a remarkable level of contempt for their fellow Suining-er, the county Party committee in 2009 published a book titled *Change in Suining*, describing the local population as “fond of arguing, combative and highly litigious”.<sup>18</sup> Zhu Pinwu 朱品武, head of the Suining Credit Office would later tie this issue directly to the area’s economic woes, saying;

Managing society is one of the most important functions of the government. Social environment, official style and folk customs are very critical in the development of the economy. If the government fails to take action in its management of society – especially when it comes to both folk and official customs – then society will get out of hand and there will be no environment for economic development.”<sup>19</sup>

In response, local Party Secretary Wang Tianqi 王天琦 began to introduce a range of increasingly alternative policies. This began with top-down reforms tackling corruption and promoting good behaviour among officials, banning lunchtime drinking for example.<sup>20</sup> Beyond the stricter management of cadres, new measures emphasised the role of moral discipline among the general public. In May 2009, the county Party committee published its *Lighting the Lamp of the Heart to Punish Evil and Celebrate the Good: Focused Actions for the Construction of Folk Customs in Suining County*, outlining a range of efforts to improve the area’s moral situation as a key to unlocking economic growth and inbound investment.<sup>21</sup> One of these proposed solutions was the use of public credit information to “mould the masses into greater levels of trust”.

Work on a new credit system in Suining began in the summer of 2008 with a public consultation. Door-to-door surveys and townhall sessions were hosted across five different locations alongside 15 symposia with local officials, business owners and farmers. Five thousand questionnaire responses were gathered, culminating in 19 revisions to the county’s original plan outlining what behaviours should be included within the scope of the system.

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<sup>18</sup> He Chao, ‘Jiangsu’s Suining Divides People into Four Levels with “Good Citizens” Receiving Preferential Treatment’.

<sup>19</sup> NetEase, ‘Zhu Pinwu: Terminology like “Good Citizen” Misleads Public Opinion’.

<sup>20</sup> The ban on alcohol was precipitated by a tragic incident in January 2008, in which a local official drove into five children, killing two of them, while drunk. Within the first year of the ban coming into force, 18 government officials were fired for daytime drinking, including the deputy head of the Civil Affairs Bureau, vice principal of a local primary school, and the mayor of Lanshan Town. See Wang Guoqiang, ‘Jiangsu Suining’s Storm of “Strict Cadre Management”’; Wang Guoqiang, ‘Jiangsu’s Suining Dismisses More than 50 Cadres from their Posts’.

<sup>21</sup> Li Runwen and Liu Chang, ‘Managing the Storm and Establishing Rules in Suining: Chronicling Political Reform in Suining, Jiangsu’.

The final drafts of two core documents on Suining's "mass credit management" (大众信用管理) system were ratified in September 2009 for launch at the start of the following year.<sup>22</sup>

The documents describe a system of routine public surveillance, gathering data on a wide range of social behaviours to be quantified and collated into an individual score subject to corresponding rewards and restrictions. A *Behaviour Code* outlined a general code of conduct across daily life, while *Evaluation Details* enumerated 29 specific acts and the impact they would have on an individual's credit score. Citizens would start with 1,000 points, with scores rising or falling between 10-100 points for a range of behaviours. "Social management" issues such as infringements of the one-child policy, counterfeiting or run-ins with local urban management authorities (城管) would lose you 35 points. Issues related to family morality, property theft or traffic violations would see you docked 50. Spreading misinformation or libellous claims would lose you 100. Total scores would then be calculated on a quarterly basis and published as a rank from A-D, with 'A' for scores above 970 and 'D' for those below 600. As per the county's *Mass Credit Management Measures*, these grades were supposed to be used in administrative licensing, government tendering and welfare assistance.<sup>23</sup> The cost of setting the system up through a Shenzhen-based software company reportedly ran to 800,000 RMB (110,000 USD).<sup>24</sup>

Data collection began in January 2010. Just a few weeks in, however, the authorities decided and subsequently announced that rather than wait until the end of the quarterly cycle, they would publish interim findings for January and February in order to galvanise wider participation in the system. And so in mid-March came the first two batches of results.<sup>25</sup> Instances of 1,064 positive and 1,926 negative acts were tabulated alongside the names, addresses and total scores of the corresponding individuals. These were published in full not only online, but on the front page of the local *Suining Today* newspaper (see Figure 16). Recorded behaviours included non-payments of taxes, running a red light, giving birth to a second child and loan defaulting.

Keen to share the news of their innovative approach to social management, Suining Party officials granted exclusive interviews and access to reporters from the *Southern Metropolis Daily* (南方都市报). The newspaper – known for its hard-hitting investigative work – wrote up a scathing review of the system, triggering a wave of wider interest from journalists and academics at the national level.<sup>26</sup> The regulations were criticised by some as a

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<sup>22</sup> Suining County CCP Committee, 'Suining County Mass Credit Management Measures'; Suining County CCP Committee, 'Suining County Mass Credit Information Evaluation Details'.

<sup>23</sup> Suining County CCP Committee, 'Suining County Mass Credit Management Measures'.

<sup>24</sup> Chen Qiang, 'Suining County's "New Credit Administration" Launched in March, Yet Most People are Unaware or Give it Mixed Reviews'.

<sup>25</sup> He Chao, 'Jiangsu's Suining Divides People into Four Levels with "Good Citizens" Receiving Preferential Treatment'.

<sup>26</sup> Zhang Jun, 'The County Government Giving "Ratings" to its Citizens to Spur Good Behaviour and Give Preferential Treatment to "Good" Citizens'; Zou Xiaoming, 'What's Wrong with Suining's "Good Citizen Certificates"?'; Ju Jing, 'County Party Committee Secretary Wang Tianqi Responds to Suining's Credit Rating



kind of *jiafa* (家法), referencing the moralising rules that apply within the family but that are not appropriate within the context of the state. Others compared the system with the “good citizen certificates” (良民证) issued by occupying forces during the Second Sino-Japanese War as a way of identifying potential resistance.<sup>27</sup> Many criticised the intrusiveness of its methods and scope, especially when it appeared that so few people on the ground had actually heard of the system.<sup>28</sup>

Mortified by the barrage of negative coverage, Suining’s Propaganda Department sent a letter to *Southern Metropolis* in an attempt to quell the firestorm.<sup>29</sup> They stated, somewhat unconvincingly, that their goal was to improve citizens’ credit rather than citizens themselves, reminding readers that government officials are also included in the system. They denied any abuse of power and reiterated that citizens’ right to privacy would be respected. For his part, Zhu Pinwu didn’t see what all the fuss was about, defending the scores as “scientifically calculated” and justifying the inclusion of private information as a “reflection of one’s overall *suzhi*”.<sup>30</sup> This defensiveness escalated through March, culminating in the local government’s publication of a 10,000 word diatribe titled *Who Will Listen to Suining?*<sup>31</sup> By April, officials had stopped granting interviews and the news cycle moved on. Contrary to English-language reporting on Suining’s “mass credit”, the system was, however, not shuttered but reformed. Points deductions for a handful of activities were removed, though – having learned a lesson about public scrutiny – precisely what changes were made was kept secret from the media.<sup>32</sup>

## THE JIANGSU MODEL

It is hard to know whether what happened in Suining represented a conscious attempt to trial credit-based behavioural nudging, or a local administration gone rogue. That is, after all, one of the benefits of such fragmented governance; siloed experimentation allows for siloed criticism, shielding the system as a whole from meaningful blowback. At the provincial level, however, it is clear that Jiangsu drew on the example of Suining, as well as other early iterations of credit-based governance in Suzhou, Nanjing and elsewhere to lay the foundations for what would go on to become one of the most comprehensive social credit

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<sup>27</sup> For studies on the use of citizen ratings and categorisation during the Japanese occupation of China, see Mitter, ‘Classifying Citizens in Nationalist China during World War II, 1937–1941’; Harari, ‘Between Trust and Violence’.

<sup>28</sup> Chen Qiang, ‘Suining County’s “New Credit Administration” Launched in March, Yet Most People are Unaware or Give it Mixed Reviews’.

<sup>29</sup> Zhu Zhigeng, ‘Suining County Party Committee Propaganda Department Sends Letter to Southern Metropolis Daily in Response to its Use of the “Good Citizens” Term’.

<sup>30</sup> NetEase, ‘Zhu Pinwu: Terminology like “Good Citizen” Misleads Public Opinion’.

<sup>31</sup> The article failed to assuage public concern and was removed several days later.

<sup>32</sup> Liu Juntao and Pan Xuhai, ‘The Whirlpool of Suining County’s Government Credit Reporting’.

systems in the country. These early experiences in turn moulded the system's theoretical development at the national level. Lian Weiliang, social credit's architect-in-chief, joined the NDRC in February 2012. By July, his department had been appointed co-lead of the *Inter-ministerial Joint Conference for the Construction of a Social Credit System*, a signifier of the system's expanding remit away from the purely financial and towards the regulatory (see Chapter Two). By November, Lian was meeting with provincial leaders from Jiangsu, Shanghai, Guangdong and Shaanxi to hear about their experiences thus far in the realm of social credit, as well as ideas for future development.<sup>33</sup> As shown in Chapter Two, the drafting of the 2014 *Planning Outline* was a consultative process – as indeed the whole of the social credit project has been. Given Lian's effusiveness for local piloting (see Chapter Three), the feedback he heard from his Jiangsu colleagues was presumably useful. Indeed, it is clear that much of the language, structure and process outlined in the earliest Jiangsu documents is repeated in the 2014 State Council plan.

### Legislation

With the central *Planning Outline* now published, the game of policy ping pong continued, the ball now firmly back in the provinces' court. Work began on a local roadmap to complement the national programme, culminating in the publication of the *Jiangsu Provincial Planning Outline for the Construction of a Social Credit System (2015-2020)* in March 2015.<sup>34</sup> This document took on the role of capstone in the apex of Jiangsu's blossoming public credit canon, consisting at this point of more than 100 provincial rules and regulations. The *Provincial Planning Outline's* development rationale echoed that of its central-level cousin, describing social credit as key in the cultivation of socialist core values, development of the socialist market economy, innovation of social governance and improvement of administrative efficiency. It also highlighted the technology's role in enhancing the province's overall competitiveness both domestically and internationally. Structurally, it lists everything we see in the national plan, emphasising the need to establish a legal basis for the system's development, the building of technical infrastructure, the expansion of a joint rewards and punishments scheme – namechecking three trial provincial regulations published in 2013 – the creation of a credit services market, and finally the propagation of trust culture throughout the population.<sup>35</sup> The document also outlines the role of piloting across the whole spectrum of government. At the provincial level, the plan advocates for a focus on a handful of applications for concentrated development and promulgation. At the city level, it

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<sup>33</sup> NDRC, 'Deputy Director Lian Weiliang Presides over Credit Legislation Symposium'.

<sup>34</sup> Jiangsu Provincial People's Government, 'Notice Issuing the Jiangsu Provincial Planning Outline for the Construction of a Social Credit System (2015-2020)'.

<sup>35</sup> Jiangsu Provincial People's Government, 'Jiangsu Provincial Punishment Measures for Untrustworthy Legal Persons (Trial)'; Jiangsu Provincial People's Government, 'Jiangsu Provincial Punishment Measures for Untrustworthy Natural Persons (Trial)'; Jiangsu Provincial People's Government, 'Implementation Measures for the Administrative Management of Credit Reports, Credit Commitments and Credit Reviews in Jiangsu Province'.

suggests the setup of “demonstration zones” that prioritise the creation of cross-jurisdictional linkages between credit information and rewards and punishments. Not to be perturbed by the experience in Suining, it also encourages the construction of county-level systems as a way of incubating social credit with local characteristics.

With a provincial vision now established, the real meat on the Jiangsu social credit system’s bones began to emerge, lending colour to its unique characteristics. In the absence of clear central leadership, a quick succession of provincial documents attempted to define 1) the parameters of data collection in the social credit system, and 2) the consequences to be imposed on credit subjects for their behaviour. In 2017, the provincial government issued its *Implementation Opinions on the Establishment of a Joint Punishment Mechanism for Judgement Defaulters*, formally expanding a 2016 set of measures that had only targeted the corporate space to encompass a wider range of regulatory functions.<sup>36</sup> Jiangsu led the charge in broadening the social credit system to include rewards as well as punishments. As early as 2015, the province had published a set of trial measures on the promotion of “trustworthy” subjects, marrying the language of the 2014 *Planning Outline* with the CCC’s *Opinions on Promoting the Institutionalisation of Trust* of the same year.<sup>37</sup> The measures advocate for the creation of red-lists based on meritorious conduct shared between different rungs of government for reward.<sup>38</sup> At this point, no such formal mechanism existed at the central level, first appearing in 2018 before being further codified in provincial legislation.<sup>39</sup> In 2019, the *Notice on Applications of Jiangsu Province’s System of Credit Joint Rewards and Punishments* gave full play to the use of credit information for both positive and negative incentivisation.<sup>40</sup> Public credit information was defined in 2018 as data on both legal and natural persons generated or obtained by administrative bodies in their day-to-day work that had the potential to be used for identification and analysis.<sup>41</sup> The *Provincial Public Credit Information Management Measures* replaced some earlier documents mentioned in the previous section of this chapter and put Jiangsu at the forefront of a nationwide effort to standardise the scope of the social credit system.

Despite this head start and for reasons not immediately clear, Jiangsu did not manage to issue a set of provincial level “social credit regulations” before the conclusion of its five year

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<sup>36</sup> Jiangsu Provincial People’s Government, ‘Opinions on the Implementation of Joint Punishment Measures for Judgement Defaulters’; Jiangsu Provincial People’s Government, ‘Jiangsu Provincial Management Measures for Tax Untrustworthiness (Trial)’.

<sup>37</sup> State Council, ‘Planning Outline for the Construction of a Social Credit System (2014-2020)’; CCC, ‘Opinions on Promoting the Institutionalisation of Trust’.

<sup>38</sup> Jiangsu Provincial Credit Office, ‘Jiangsu Province Measures for the Management and Publication of Red Lists for Honesty and Trust-Keeping (Trial)’; Jiangsu Provincial Credit Office, ‘Jiangsu Province Measures for the Management and Publication of Red Lists for Honesty and Trust-Keeping (Trial)’.

<sup>39</sup> Jiangsu Provincial People’s Government, ‘Jiangsu Provincial Implementation Opinions on Establishing and Improving a Joint Reward System for Trust-Keeping and a Joint Punishment System for Trust-Breaking’.

<sup>40</sup> Jiangsu Provincial Credit Office, ‘Notice on Applications of Jiangsu Province’s System of Credit Joint Rewards and Punishments’.

<sup>41</sup> Jiangsu Provincial People’s Government, ‘Jiangsu Provincial Public Credit Information Management Measures (Trial)’.

2015-20 roadmap. In contrast, seven other provinces had managed to do so by the end of 2020, as had five municipal governments, four of which were in Jiangsu.<sup>42</sup> This was perhaps simply because the province's already highly-developed legislative framework did not necessitate the creation of new regulations until the further standardisation and recentralisation of the system post-2020 (see Chapter Five). Put simply, other administrations had some catching up to do before Jiangsu needed to refocus its efforts on social credit law-making. The expiry of the five year *Planning Outline* was marked with the publication of a three year bridging plan in January 2020.<sup>43</sup> Work clearly accelerated, however, and by July 2021, the *Jiangsu Provincial Social Credit Regulations* were finalised for implementation on 1<sup>st</sup> January 2022, the contents of which I analysed in Chapter Three.<sup>44</sup>

### Organisation

The governance of Jiangsu's system is as perfect a microcosm of the wider social credit project as one can find (see Figure 17). In structure, rhetoric and administration, it mirrors the national scheme to a tee, but with all the experimental novelty expected of local pilots in China's fragmented authoritarianism. At the centre of the provincial system's organisation sit three key institutions.

The first is the Leading Small Group (领导小组) mentioned above. Its membership has changed on three occasions since its setup in 2005 and currently stands at a total of 42 departments (see Figure 18).<sup>45</sup> The group is led by the Executive Vice Governor and is overseen by the Provincial Development and Reform Commission (PDRC), with whom it conveniently shares an office space. Over the years, the group has met relatively infrequently. Its original 2005 *Work Plan* set a goal of meeting every six months; in reality, it managed to come together on just three occasions between 2015-20.<sup>46</sup> Its primary role is to review national instructions as they come down the *tiao*, adapting these to local characteristics and getting consensus around key tasks. For example, in 2018 when the CCC issued its request for a retooling of social credit to focus on the 19 issues worthy of "special governance" (see Chapter Two), the Leading Small Group convened a special joint meeting

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<sup>42</sup> The seven provinces that had published social credit regulations by the end of 2020 were Hubei, Shanghai, Hebei, Zhejiang, Henan, Shandong and Tianjin. The five cities with municipal regulations in place by this point were Wuxi, Taizhou, Suqian, Xiamen and Nanjing. See Chapter Three, Figure 10 for more detail.

<sup>43</sup> Jiangsu Provincial Social Credit Construction Leading Small Group, 'Jiangsu Province Three-Year Action Plan for the Further Promotion of Social Credit System Construction'.

<sup>44</sup> Jiangsu Provincial People's Congress Standing Committee, 'Jiangsu Provincial Social Credit Regulations'.

<sup>45</sup> Jiangsu Provincial Development and Reform Commission, 'Jiangsu Province Makes Adjustments to its Social Credit Construction Leading Small Group'.

<sup>46</sup> Jiangsu Provincial Credit Office, 'The Organisational Protections and Coordination of Credit System Construction have been Continuously Strengthened'.

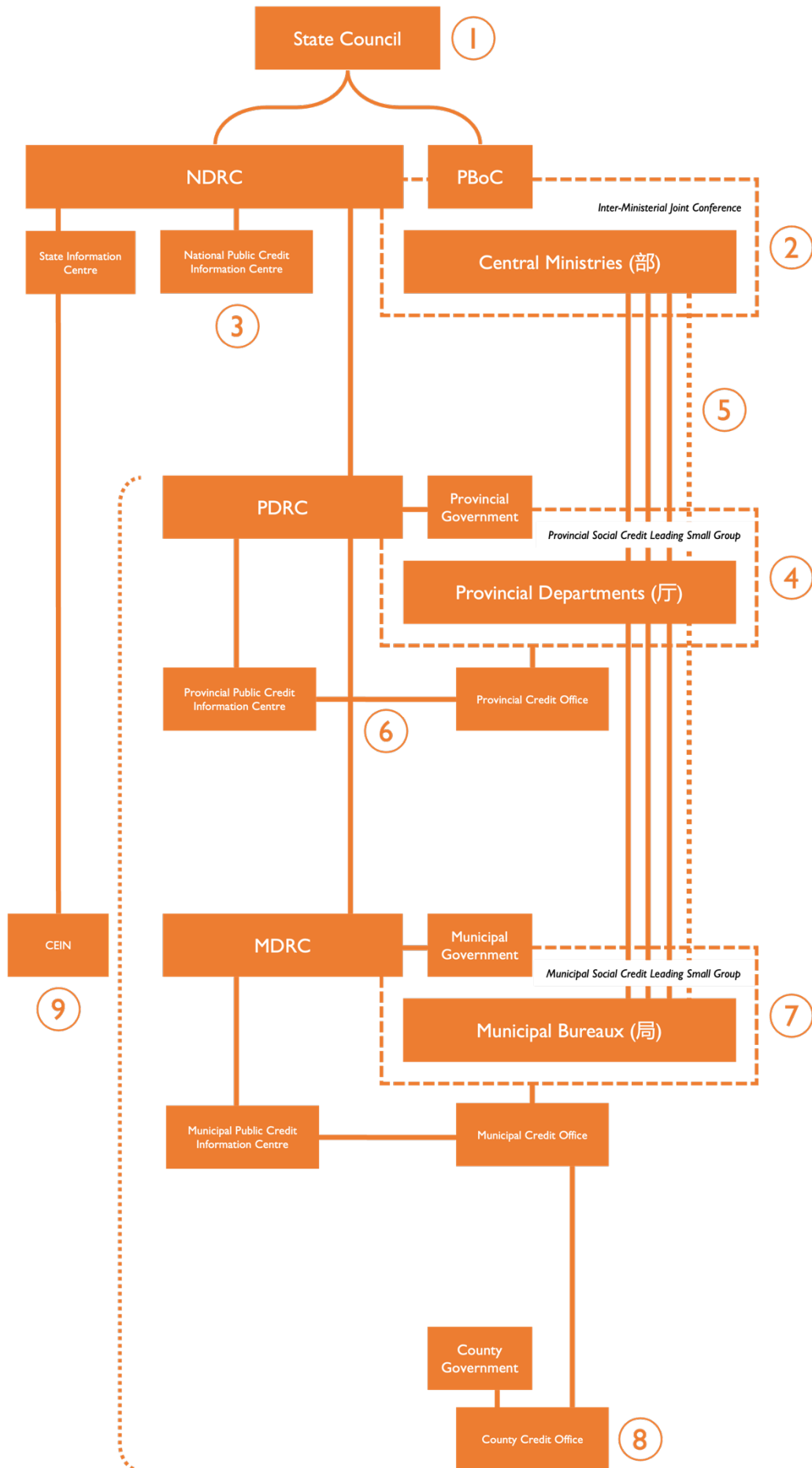


Figure 17: Institutional organisation of the social credit system across central and local government

1. The State Council is China's highest administrative authority. Led by the Premier, the council is currently composed of 24 constituent ministries and commissions, including the NDRC and PBoC. Its primary role is to formulate administrative measures, issue decisions, monitor implementation, prepare economic plans and budgets, and draft legislative bills for consideration by the NPC.
2. The NDRC and PBoC co-lead the Inter-ministerial Joint Conference for the Construction of a Social Credit System, in charge of coordinating social credit policy implementation at the central level.
3. Housed within the NDRC, the National Public Credit Information Centre coordinates the collection, sharing and publication of social credit data across departments and locales.
4. At the provincial level, Social Credit Leading Small Groups are headed up the PDRCs and local government officials. These groups are in charge of coordinating social credit policy implementation horizontally across the province, ensuring consistency and connectivity.
5. Provincial – and by extension municipal – government departments and bureaux report vertically to their respective higher authority, receiving guidance and instruction on social credit priorities and techniques.
6. Credit Offices report into local Social Credit Leading Small Groups, providing executional support. These offices sit alongside local Public Credit Information Centres that in turn integrate with the national technical system.
7. The structures seen at the provincial level are then repeated at the municipal level.
8. County and township level social credit systems take a variety of forms; some more developed iterations mirror the same structures seen at the provincial and municipal levels. Some consist only of a County Credit Office.
9. The CEIN monitors, quantifies and assesses performance across the entirety of the sub-national system, compiling reports and rankings. It feeds into the State Information Centre, a component of the NDRC.

of 33 departments to decide on a collective response, publishing the *Implementation Plan for the Deepening of Special Governance of Prominent Issues of Untrustworthiness*.<sup>47</sup>

While the Leading Small Group steers top-level coordination of Jiangsu's social credit system, it is the Provincial Credit Office (省信用办) that is responsible for day-to-day implementation. The primary role of the Credit Office is to ensure the setup of social credit structures and data collection across Jiangsu. Like other governing authorities, the Credit Office operates within a grid of institutional relationships. Horizontally, it assists provincial-level departments in the design and execution of social credit-related legislation and mechanisms; vertically, it oversees Credit Offices at the municipal-level and below.<sup>48</sup> In addition to publishing guidance in the form of "measures" (办法), the Office organises quarterly work exchange meetings as a way of monitoring progress and fostering cross-jurisdictional knowledge-sharing. In one such session in 2018, the directors of municipal and district credit offices met in Yangzhou to discuss recent policy updates to the system, learn from best practice and align plans for the next working year. Hitherto based out of the Provincial Economic and Information Technology Commission (江苏省经济和信息化委员会), the Credit Office moved in with the PDRC in November 2018, as part of a broader centralisation of NDRC supervision of social credit.<sup>49</sup>

Working hand-in-glove with the Credit Office is the Provincial Public Credit Information Centre (省公共信用信息中心). Its role is purely a technical one, building and maintaining the core infrastructure and standards required to collect, process, store, analyse, secure and share social credit data. The Centre manages integrations not only between departments and localities, but also up to the national credit information platform. The next section of this chapter covers this technical work in much more detail.

This whole structure is then replicated at the municipal and county level (see Figure 17). Currently, at least thirteen different localities across Jiangsu have established their own leading small groups, credit offices and public credit information centres. Each cooperate internally with other government departments at the municipal and county level, as well as vertically as they collaborate with peers both up and down the reporting line. The whole system is overseen by the NDRC through its provincial and municipal branches respectively. The PDRC tracks performance across departments, periodically releasing its view on progress, while as I have documented in Chapter Three, the CEIN – itself a part of the State Information Centre, an office of the NDRC – scores and ranks cities and counties.<sup>50</sup>

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<sup>47</sup> Jiangsu Provincial Guidance Commission on the Construction of Spiritual Civilisation, 'Implementation Plan for the Deepening of Special Governance of Prominent Issues of Untrustworthiness'.

<sup>48</sup> Jiangsu Provincial People's Government, 'Notice Issuing the Provisions on Main Responsibilities, Internal Organisation and Staffing of Jiangsu's Provincial Economic and Information Technology Commission'.

<sup>49</sup> Jiangsu Provincial Credit Office, 'The Organisational Protections and Coordination of Credit System Construction have been Continuously Strengthened'.

<sup>50</sup> Yuandian Credit, 'The "Vanguard" List is Live! Forging a New Path through an Atmosphere of Credit Construction and Evaluation'.

Figure 18: Members of the Jiangsu Provincial Social Credit System Construction Leading Small Group, April 2023

省法院	Provincial High People's Court
省检察院	Provincial People's Procuratorate
省文明办	Provincial Civilisation Office
省委网信办	Provincial Office of the Cyberspace Affairs Commission
省委编办	Provincial Office of the Institutional Organisation Commission
省发展改革委	Provincial Development and Reform Commission
省教育厅	Provincial Department of Education
省科技厅	Provincial Department of Science and Technology
省工业和信息化厅	Provincial Department of Industry and Information Technology
省民宗委	Provincial Committee for Ethnic and Religious Affairs
省公安厅	Provincial Public Security Department
省民政厅	Provincial Department of Civil Affairs
省司法厅	Provincial Department of Justice
省财政厅	Provincial Department of Finance
省人力资源社会保障厅	Provincial Department of Human Resources and Social Security
省生态环境厅	Provincial Department of Ecology and Environment
省住房城乡建设厅	Provincial Department of Housing and Urban-Rural Development
省交通运输厅	Provincial Department of Transportation
省水利厅	Provincial Department of Water Resources
省农业农村厅	Provincial Department of Agriculture and Rural Affairs
省商务厅	Provincial Department of Commerce
省文化和旅游厅	Provincial Department of Culture and Tourism
省卫生健康委	Provincial Health Commission
省应急厅	Provincial Department of Emergency Management
省国资委	Provincial State-owned Assets Supervision and Administration Commission
省政务办	Provincial Government Affairs Office
省市场监管局	Provincial Administration for Market Regulation
省广电局	Provincial Radio and Television Administration
省体育局	Provincial Administration for Sport
省统计局	Provincial Bureau of Statistics
省医保局	Provincial Healthcare Security Administration
省粮食和储备局	Provincial Food and Strategic Reserves Administration
省地方金融监管局	Provincial Bureau of Local Financial Regulation and Supervision
省药监局	Provincial Food and Drug Administration
省知识产权局	Provincial Intellectual Property Office
省总工会	Provincial Federation of Trade Unions
省税务局	Provincial Taxation Administration
南京海关	Nanjing Customs Authorities
江苏海事局	Jiangsu Maritime Safety Administration
人民银行南京分行	Nanjing Branch of the People's Bank of China
江苏银保监局	Jiangsu Banking and Insurance Regulatory Bureau
江苏证监局	Jiangsu Securities Regulatory Bureau

Funding for the social credit system is provided by the provincial government. Between 2009-13, an annual budget of 10 million RMB (1.4 million USD) was allocated to the system's construction, a vanishingly small 0.002 per cent of the province's 480 billion RMB of government spending in 2010.<sup>51</sup> In 2014, this budget was increased to 17 million RMB.<sup>52</sup> In addition to this annual sum, further funds have been made available out of a provincial pot for "special" projects. Documents from 2016 and 2020 list social credit as one of just four categories of proposal eligible for funding in this way.<sup>53</sup> In 2017 and again in 2021, the Provincial Credit Office issued guidance for departments and localities on how they could apply for grants to help in the construction of data gathering systems.<sup>54</sup> Between 2016-20, over 100 million RMB (14 million USD) of "special funds" were allocated to 112 social credit projects across the province.<sup>55</sup>

### Information

Since their founding, the primary function of the Provincial Credit Office and Public Credit Information Centre has been to define what constitutes "social credit information" and to build a technical system for its collection and use.

"Credit information" (信用信息) is defined in the 2021 *Jiangsu Provincial Social Credit Regulations* as "objective data and material that can be used to identify, analyse, and judge the credit status of credit subjects".<sup>56</sup> It consists of both "public credit information" – data gathered by government agencies in the performance of their duties – and "market credit information" submitted by credit service providers, industry associations and chambers of commerce as part of their commitment to self-regulatory practices. The exact scope of what constitutes public credit information is detailed in provincial-level "catalogues" (目录), three of which were published in 2018.<sup>57</sup> In accordance with central-level social credit

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<sup>51</sup> Jiangsu Provincial Department of Finance, 'Report on Jiangsu Province's 2010 Budget Implementation and 2011 Budget Draft'.

<sup>52</sup> Jiangsu Provincial Credit Office, 'The Organisational Protections and Coordination of Credit System Construction have been Continuously Strengthened'.

<sup>53</sup> Other eligible categories included "modernising government services, building of features with provincial characteristics, or price controls (e.g. production and circulation of reserve commodities or compensation for losses caused by gov policies)" See Jiangsu Provincial Department of Finance, 'Interim Provisions on the Application of Provincial Special Funds for Credit Information'; Jiangsu Provincial Department of Finance and Jiangsu Provincial Development and Reform Commission, 'Jiangsu Province Measures for the Management of Special Funds for the Development of a Modern Service Industry'.

<sup>54</sup> Jiangsu Provincial Credit Office, 'Notice on Strengthening the Management of Special Funds for the Construction of a Provincial Social Credit System'; Jiangsu Provincial Development and Reform Commission, 'Jiangsu Provincial Measures for the Project Management of Social Credit System Construction'.

<sup>55</sup> Jiangsu Provincial Development and Reform Commission, 'Jiangsu Provincial Plan for the "14th Five-Year Plan" and Social Credit System Construction'.

<sup>56</sup> Jiangsu Provincial People's Congress Standing Committee, 'Jiangsu Provincial Social Credit Regulations' Article 4.

<sup>57</sup> Jiangsu Provincial Credit Office, 'Jiangsu Provincial Public Credit Information Catalogue (2018 Edition)'; Jiangsu Provincial Credit Office, 'Jiangsu Province Departmental and Work Unit Catalogue for the

reform (see Chapter Five), the 2021 *Regulations* stipulate that the Jiangsu system align itself with the 2021 *National Basic Catalogue of Public Credit Information*, publishing only a “supplemental catalogue” (补充目录) at the provincial level.<sup>58</sup> This was duly completed in December 2022 and released for public comment (see Chapter Five).<sup>59</sup> Departments, municipalities and market entities are required to collect data listed within the scope of the provincial catalogue and submit to the Public Credit Information Centre, where it is inputted into one of two databases of “credit files” (信用档案). The first of these was established in 2011 covering legal persons, collecting credit information on state-owned enterprises, private businesses, non-governmental organisations and other societal groups. The second was completed later in 2015 and holds information on permanent residents over the age of 18. By the end of 2020, Jiangsu’s Public Credit Information Centre had collected 6.9 billion pieces of credit information, approximately 81 per cent of which pertained to natural rather than legal subjects. The system included records for 3.73 million companies, 49,000 public institutions, 97,000 societal organisations, 140,000 farming cooperatives and village committees, and close to 64 million citizens. Between 2015-20, the volume of information collected on individuals alone increased 56-fold to reach 5.6 billion data points.<sup>60</sup>

This credit information is not simply warehoused, however. The Public Credit Information Centre is also responsible for the “platformisation” (平台化) of social credit data, managing a network of integrations horizontally between provincial ministries, as well as vertically between municipal and county-level systems, while simultaneously feeding into the national public credit infrastructure.

Figure 19 shows the remarkable diversity of credit information sharing and application across the province. On a departmental level, the Centre seeks out access to additional data that can help it expand its functionality. In 2019, a data-sharing agreement was signed with the Provincial Government Affairs Office to integrate with its database of 36 million companies nationwide as part of a push to improve its licensing and approvals process.<sup>61</sup> This kind of relationship goes both ways, with the Centre also assisting various peers with access to information for wider use. Jiangsu’s finance, taxation, housing, transportation, human resources, environment and civil affairs bureaus all maintain their own systems that pull on public credit information for effective empirical decision-making. The Public Credit Information Centre also manages a web of satellite platforms and sub-systems across the province. By 2020, some 295 sites had been

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Classification of Untrustworthy Credit Behaviour’; Jiangsu Provincial Credit Office, ‘Catalogue of Public Credit Information to be Submitted by Districts and Cities to the Provincial Level’.

<sup>58</sup> Article 35 of Jiangsu regs; *National Basic Catalogue of Public Credit Information*

<sup>59</sup> Jiangsu Provincial People’s Congress Standing Committee, ‘Jiangsu Provincial Social Credit Regulations’ Article 35.

<sup>60</sup> Jiangsu Provincial Credit Office, ‘Jiangsu’s Provincial Credit Management System is Continuously Improving’.

<sup>61</sup> Jiangsu Provincial Credit Office, ‘A Province-Wide Credit Information System has been Fully Established’.

<b>Service Area</b>	<b>Method</b>	<b>Example</b>
Administrative Applications	Batch push	120 million pieces of credit information on legal subjects to provincial departments and a further 118 million pieces to 13 districts and cities for those administrations to design their own applications
	Platform queries	11 different provincial departments queried the database a total of 14.7 million times
	Credit checks	887 batches of credit reviews provided to 32 provincial departments and 13 districts and cities, covering 232,500 businesses to be used in administrative matters such as government bidding and financing
	Civil servant recruitment checks	Credit files of 828 candidates across 42 different batches were queried as part of the vetting process for civil servant recruitment and transfers across various departments
Societal Applications	"Credit Jiangsu" website	A "one-stop-shop" of credit information where subjects can check their own records and apply for "credit repair" training and amendments; approximately 2,000 applications are received each month, with 20,528 credit files repaired
	Public Credit Information Service Hall	16,000 credit information reports issued as reference for companies tendering for construction projects
	Self-service terminal	Provincial Government Service Hall hosts two public credit terminals, providing convenient self-service access to credit information; Nanjing, Wuxi and Taizhou have also set up such access points
	Credit information integrated service platform	298 outlets across the province, issuing 82,000 integrated credit inquiry reports and 22,200 credit review reports on market entities
Financial Applications	Credit checks	13 financial institutions have requested a total of 94 million pieces of credit information in making lending decisions
	Data sharing	Agreement with Jiangsu United Credit Information to support the construction of the Jiangsu provincial CreditEase Loan platform
Third-Party Credit Service Applications	Data sharing	Data sharing agreements with four societal organisations and 57 credit service institutions to support the development and application of credit information products

Figure 19: Credit information applications in Jiangsu province, 2015-20

set up across 13 separate municipalities and 96 of their constituent counties.<sup>62</sup> Relevant data collected at this local level is then also integrated upwards to national level infrastructure.

Jiangsu was the first province to achieve this technical integration and by the end of 2020 had submitted some 3.5 billion pieces of credit information to the national platform, ranking second out of all provinces in terms of volume. In return, the central government issued 191 million entries related to tax violations and other untrustworthy acts for ingestion into the Jiangsu database.<sup>63</sup> The final dynamic at play in Jiangsu's platformised credit system is the sharing of data with non-governmental actors for integration into a wide range of processes and decisions. The Public Credit Information Centre currently has data-sharing agreements with 13 banks, four societal organisations and 57 credit service providers, encouraging them to make use of credit information in the creation of CreditEase products. This kind of third-party action has been greatly emphasised as part of recent reforms to the social credit system that encourage its application beyond its traditional scope (see Chapter Six).

In addition to these data-sharing agreements, there is of course also the public-facing aspect to Jiangsu's social credit system. The "Trustworthy Jiangsu" website was renamed "Credit Jiangsu" (信用江苏) in 2017 to bring it in line with the national-level "Credit China" platform. It serves not only as a repository for credit-related news, policies and case studies, but also as a portal for individuals and companies to query their own credit files and apply for "credit repair" (信用修复). The "Jiangsu Credit Service" (苏信服) WeChat official account provides similar services for mobile users. Several cities have created their own smartphone apps, with Suzhou and Nanjing both winning national awards for their efforts.<sup>64</sup>

#### *Incentivisation*

Another key function of Jiangsu's social credit institutions is to coordinate the design and rollout of a provincial-wide joint rewards and punishments mechanism. As with other aspects of the system, this revolves around a web of departmental and local documents that take their lead from a central guiding text. Pre-2022, the heart of Jiangsu's joint incentives network lay in its 2018 *Provincial List of Joint Rewards for Trust-Keeping and Punishments for Trust-Breaking*.<sup>65</sup> The *List* distilled relevant entries from 36 national-level systems for joint punishment and six for joint reward into 218 measures – 51 positive and 167 negative – for application across Jiangsu.

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<sup>62</sup> Jiangsu Provincial Credit Office, 'Implementation Opinions on Further Promoting the Integrated Construction of Provincial and Municipal Public Credit Information Systems'.

<sup>63</sup> Jiangsu Provincial Credit Office, 'A Province-Wide Credit Information System has been Fully Established'.

<sup>64</sup> Liu Mengyu and Wu Xian, 'Wonderful Competition for "Credit at Your Fingertips"'.

<sup>65</sup> Jiangsu Provincial Credit Office, 'Jiangsu Provincial List of Joint Rewards for Trust-Keeping and Punishments for Trust-Breaking (2018 Edition)'.

	Inputs		Outputs	
	Positive	Negative	Rewards	Punishments
Provincial High People's Court		44		
Provincial Department of Education			1	4
Provincial Public Security Department		3		7
Provincial Department of Civil Affairs	16	12	7	4
Provincial Department of Human Resources and Social Security		6	3	2
Provincial Department of Transportation		22	1	6
Provincial Department of Agriculture and Rural Affairs		8		5
Provincial Forestry Department				5
Provincial Department of Water Resources				16
Provincial Department of Commerce		17	1	21
Provincial Department of Culture			1	2
Provincial Health and Family Planning Commission				3
Provincial Taxation Administration	14	15	9	12
Provincial Industry and Commerce Bureau		10	1	14
Provincial Food and Drug Administration		4	2	7
Provincial Administration for Sport			1	
Provincial Administration for Work Safety	11	7	6	6
Provincial Bureau of Statistics		7		1
Provincial Tourism Bureau				3
Provincial Food and Strategic Reserves Administration				1
Provincial Ocean and Fisheries Bureau				1
Provincial Intellectual Property Office			1	
Provincial Price Bureau				1
Provincial Public Resources Trading Centre				4
Provincial Civilization Office			3	14
Nanjing Customs Authorities	10	10	14	11
Provincial Securities Regulatory Bureau		2		5
Provincial Finance Office				1
Provincial Banking and Insurance Regulatory Bureau				10
Provincial Postal Administration				1

Figure 20: Table of Jiangsu provincial rewards and punishments, 2018<sup>66</sup>

<sup>66</sup> Adapted from [http://credit.jiangsu.gov.cn/art/2021/11/18/art\\_83774\\_10117323.html](http://credit.jiangsu.gov.cn/art/2021/11/18/art_83774_10117323.html)

Figure 20 shows a breakdown of these incentives across jurisdiction. Inputting departments are those that have issued social credit provisions covering behaviours that will have a positive or negative impact on a subjects' file; for example, there are 22 acts designated by the Provincial Department of Transport that will see you black-listed. Outputs are the rewards or punishments issued cross-departmentally when a subject has been red- or black-listed. Some of these relationships are considerably one-sided. The Provincial High People's Court lists 44 behaviours it considers black-list-worthy, but itself does not administer any rewards or punishments on behalf of other departments. Conversely, the Provincial Department of Water Resources metes out 16 forms of punishment against entities black-listed by its peers but does not itself refer subjects to the listing system. Just as with credit information, the central government directed reforms to the joint rewards and punishment system in 2021, instructing provinces to issue only "supplemental lists" (补充清单) of possible incentives to complement a *National Basic List* (see Chapter Five). Again, this hierarchy was incorporated into the 2021 *Provincial Regulations* and followed up by a local list at the end of that year.

The definition of "untrustworthy" conduct in Jiangsu is devolved to provincial-level departments or local-level credit offices. Crucially, however, such designations must be rooted in law and backed up by either an effective ruling or judgement document or other document showing an administrative decision or ruling.<sup>67</sup> Unsurprisingly, given the system's use as a tool for judicial enforcement, most examples of Jiangsu's joint punishment system in action relate to administrative issues. The Provincial Department of Transport, for example, maintains a black-list of passengers who have been caught fare-dodging, while the Tax Bureau ranks Jiangsu's tax-payers from A-D, with details of the lowest-graded subjects circulated among other departments for further sanctions.<sup>68</sup> Several departments have used the system as a way of maintaining professional standards. The Provincial Department of Science and Technology black-lists individuals found to have violated codes of scientific conduct and ethics, while the Provincial Department of Justice maintains credit files on lawyers, potentially restricting their activities if black-listed elsewhere in the social credit system.<sup>69</sup> Departments are encouraged to cooperate and co-publish, especially where tackling cross-jurisdictional matters such as the 19 issues nominated by the CCC for "special governance". Ten different provincial ministries launched a crackdown on food

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<sup>67</sup> Jiangsu Provincial People's Congress Standing Committee, 'Jiangsu Provincial Social Credit Regulations' Article 27.

<sup>68</sup> Jiangsu Provincial Department of Transport, 'Jiangsu Provincial Measures for the Management of Lists of Joint Rewards for Trustworthy and Joint Punishments for Untrustworthy in Transportation'; Jiangsu Provincial People's Government, 'Opinions on Collaboration and Co-Governance in Taxation in Jiangsu Province'.

<sup>69</sup> Jiangsu Provincial Department of Science and Technology, 'Measures for Credit Management in Jiangsu Province's Science and Technology Plan'.

safety in Jiangsu's meat industry, while six co-issued focused measures on illegal theatre productions and other performances.<sup>70</sup>

As I discussed in Chapter Three, punishments in the Jiangsu social credit system are limited to restrictions on access to government funding, contracts or welfare, increased supervision in the form of spot-checks and inspections, and the withholding of administrative privileges given to non-black-listed or red-listed subjects as detailed below.<sup>71</sup> The Provincial Department of Housing and Urban-Rural Development prohibits black-listed entities from tendering for engineering and construction projects, while the Department of Industry and Information Technology expands its restrictions on applications for special funding beyond business to include other administrative agencies, public institutions and societal organisations.<sup>72</sup> Cross-departmental punishments create some tenuous links within the system; the Provincial Department of Public Security queries an individual's traffic violations history in making its hiring decisions.<sup>73</sup>

The rewards offered to subjects that either avoid black-listing or – where such systems are in place – are red-listed range from preferential treatment in government tendering, approvals and other administrative processes, a reduction in the frequency of inspection or other supervision, the waiving of deposits, and the provision of credit points that in turn can be exchanged for public resources.<sup>74</sup> Many of these perks are monetary. The Provincial Department of Civil Affairs provides benefits for red-listed organisations with AAA ratings in the elderly care sector that include access to government subsidies, better access to loan finance and fewer site inspections.<sup>75</sup> The Department of Water Resources provides red-listed companies and individuals with cheaper prices for their utilities. Other provisions allow for simplified bureaucratic approvals as a way of relaxing the ease of doing business. The Provincial Food and Strategic Reserves Administration recognises upstanding grain producers with priority access to new licencing and approvals.<sup>76</sup> The Nanjing Customs Authorities exempt red-listed companies from certain guarantees and inspections.

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<sup>70</sup> Jiangsu Provincial Credit Office, 'Rewards for Trust-Keeping and Punishments for Trust-Breaking are in Effective Operation'; Jiangsu Provincial Department of Culture and Tourism, 'Jiangsu Provincial Measures for the Management of "Red Lists" in the Cultural and Tourism Market (Trial)'.

<sup>71</sup> Jiangsu Provincial People's Congress Standing Committee, 'Jiangsu Provincial Social Credit Regulations' Article 46.

<sup>72</sup> Jiangsu Provincial Department of Housing and Urban-Rural Development, 'Notice on Strengthening the Management of Untrustworthy Conduct in Housing Security'.

<sup>73</sup> Jiangsu Provincial Credit Office, 'Rewards for Trust-Keeping and Punishments for Trust-Breaking are in Effective Operation'.

<sup>74</sup> Jiangsu Provincial People's Congress Standing Committee, 'Jiangsu Provincial Social Credit Regulations' Article 44.

<sup>75</sup> Jiangsu Provincial Department of Civil Affairs and Jiangsu Provincial Development and Reform Commission, 'Jiangsu Provincial Implementation Measures for the Management of Joint Punishment Lists for Untrustworthiness in the Elderly Care Service Market (Trial)'.

<sup>76</sup> Jiangsu Provincial Food and Strategic Reserves Administration, 'Jiangsu Provincial Measures for the Punishment of Seriously Untrustworthy Conduct by Grain Enterprises'.

Education

Taking instruction from central social credit planning, Jiangsu's Credit Office works closely with the Provincial Civilisation Commission to raise overall awareness and participation of the social credit system, as well as build a general "culture of trust".

Propaganda and other forms of PR and media engagement have sat at the heart of these efforts. Since its launch, the "Credit Jiangsu" website has published some 8,000 articles documenting social credit best practice for a general audience, while two provincial-level publications, the *Construction of a Jiangsu Social Credit System Work Bulletin* and *Credit Construction Trends*, cater to colleagues and researchers working in the space.<sup>77</sup> The latter provides analysis of national-level policy developments and experiences, while the former focuses primarily on work reports and reflections from local-level credit departments as a way of knowledge-sharing. By the end of 2023, close to 400 editions of the *Jiangsu Work Bulletin* had been published.

Local officials have been frequently drafted into these propaganda efforts. In 2017, 13 district and municipal leaders participated in a "Mayors Talking About Credit" initiative organised by Xinhua News Agency, giving interviews in print and broadcast media.<sup>78</sup> In 2020, Jiangsu's Credit Office organised a livestream from its workplace to give viewers an inside view on how credit is made.<sup>79</sup> At the national level, the Jiangsu system has been celebrated through extensive positive media coverage and through its participation in a number of awards. The province is a frequent winner in various categories of the "Xinhua Cup" awards at city credit summits (see Chapter Three). At the 2019 Jinan edition, Jiangsu went home with 10 per cent of all awards on offer, including the coveted "Best Social Credit Organisation".<sup>80</sup> Public participation in such campaigns is encouraged, with an annual "Credit Knowledge Competition" giving residents the chance to win recognition for their social credit savviness. In 2017, more than 220,000 people reportedly participated in the online campaign, with the winners announced during the provincial Spring Festival television gala.<sup>81</sup>

Jiangsu hosts regular training sessions for social credit practitioners across the province. The first annual professional training day was held for credit managers in 2016, providing qualifications for some 1,200 people by the end of 2020. Occasionally, outside experts are brought in, with one such session in 2017 hosting speakers from the NDRC, State Information Centre, CEIN, and Renmin and Peking Universities to discuss social credit theory and practice with 300 Jiangsu officials from over 50 departments and localities.<sup>82</sup> The

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<sup>77</sup> Jiangsu Provincial Credit Office, 'Deputy Director Dai Yueqiang Gives a Speech at the "Credit Jiangsu" Platform Operations and Maintenance Meeting'. Other provincial research and material is available here <http://credit.jiangsu.gov.cn/col/col78364/index.html>

<sup>78</sup> Six of these interviews can be found here at 'Mayors Talking About Credit 市长谈信用'.

<sup>79</sup> Jiangsu Provincial Credit Office, 'An Environment of Social Trustworthiness has Improved Significantly'.

<sup>80</sup> Yu Rui and Lü Dandan, 'Short Videos Showcasing Outstanding National Credit Cases and Applications from the Second "Xinhua Credit Cup" Launch'.

<sup>81</sup> Jiangsu Provincial Credit Office, 'An Environment of Social Trustworthiness has Improved Significantly'.

<sup>82</sup> Jiangsu Provincial Credit Office.

PDRC together with provincial Party authorities and Civilisation Commission have published a variety of pamphlets and readers as guidance for social credit officials over the years, including the *Jiangsu Civil Servant Trust Knowledge Reader* and the *Civil Service Trust Manual*.<sup>83</sup>

### *Localisation*

Jiangsu province has always put great store in its localised approach to social credit construction. From the system's earliest days, the province has incubated city-level experiments in a deliberately iterative policy-making process. As discussed in Chapter Three, this has proved hugely successful – at least according to CEIN metrics – with Jiangsu's constituent cities outperforming many of their contemporaries elsewhere. Four of the five first municipalities to issue *Social Credit Regulations* were in the province. If Jiangsu's social credit system is a microcosm of the national structure, local systems at the city- and county-level represent yet another distillation of the same principles, mirroring the province's approach to organisation, legislation, information and incentivisation, while still making room for all important innovation. Each of these aspects of local social credit is more abstracted from provincial norms than the last.

Organisationally, local systems extend and replicate the same *tiao* and *kuai* relationships that govern social credit at the provincial and national level (see Figure 17). Suzhou's social credit system, for example, is governed by offspring of the same three institutions that exist province-wide. Its Leading Small Group – established in 2013 and headed up by the city's mayor – oversees the work of a Credit Office employing 13 full-time staff and a Public Credit Information Centre whose databases plug directly in with the provincial network. Each of the nine districts and cities that fall under Suzhou's administrative authority maintain their own Credit Office branches, further extending the system's overall reach down to the county, township and village level. This whole structure is supervised by Suzhou's Municipal Development and Reform Commission (市发改委) (MDRC), itself an arm of the PDRC and NDRC in turn. Just as at the provincial level, Suzhou's social credit system is funded predominantly out of specially-allocated funds, costing some 40 million RMB (5.6 million USD) between 2015-20.<sup>84</sup> Elsewhere in the province, some cities have embraced the system even more enthusiastically. Xuzhou's Leading Small Group was made up of 63 departmental founding members at a time when the provincial group comprised just 24 representatives. It is also the only Leading Small Group province-wide headed up by the Municipal Party Secretary.<sup>85</sup>

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<sup>83</sup> Jiangsu Provincial Social Credit Construction Leading Small Group, *Jiangsu Civil Servant Trust Knowledge Reader*.

<sup>84</sup> Suzhou Municipal Development and Reform Commission, 'Suzhou Municipal Measures on the Management of Special Funds for the Construction of a Social Credit System'.

<sup>85</sup> Li Yueyue, 'Xuzhou Successfully Establishes National Model Zone for the Construction of a Social Credit System'.

One of the primary roles of these governing bodies has been to build a legislative base for social credit locally. Just as at the provincial-level, the documents issued here can be generally grouped in three ways. First, city Credit Offices are responsible for creating a canon of central municipal planning documents. These borrow heavily from parent plans at the provincial and national levels, and do not tend to meaningfully deviate either in substance or rhetoric. Atop Xuzhou's social credit pyramid sit its *Implementation Opinions on the Construction of a Social Credit System*, *Implementation Opinions on the Strengthening of Governmental Trust*, and more recently its *Implementation Opinions on Accelerating the Construction of a Social Credit System and Building New Credit-Based Supervision Mechanisms* (more on “new credit-based supervision mechanisms” in Chapter Six).<sup>86</sup> Beyond these municipal plans, the second category of local documentation covers implementation and, in particular the adaptation and application of joint rewards and punishments. Just as at the provincial level, this is where some variation occurs as different departments bend the system to their own specific needs. In Suzhou, black-listing systems for lawyers, scientists, domestic workers and many more professions draw inspiration from social credit parameters designed further up the vertical *tiao*.<sup>87</sup> Wuxi's network of social credit legislation consists of over 20 departmental documents, from construction to local law enforcement.<sup>88</sup> The third type relates to lower-level iterations of the previous two categories. As mentioned above, greater Suzhou's nine districts each host their own Credit Offices as part of a system that runs “vertical to the bottom and horizontal to the edge” (纵向到底、横向到边).<sup>89</sup> Beginning in 2019, Zhenze Town launched a “four-dimensional” social credit pilot in tandem with the Suzhou Public Credit Information Centre, covering day-to-day supervision, local business, rural governance and the silk industry.<sup>90</sup> The municipal centre set up a credit database covering the 200 or so local companies working in silk, with the goal of using “credit big data” to optimise resource allocation and regulate foul practice.

This decentralised model of local informational systems and sister-systems is echoed province-wide. In Xuzhou, like many more rural areas, the rollout of a social credit network has gone hand-in-hand with a broader drive towards informatisation. Beginning in 2015,

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<sup>86</sup> Xuzhou Municipal Credit Office, ‘Implementation Opinions on the Construction of a Social Credit System’; Xuzhou Municipal People's Government, ‘Notice Issuing Xuzhou's Municipal Implementation Opinions on Strengthening the Construction of Governmental Trustworthiness’.

<sup>87</sup> Suzhou Municipal Bureau of Justice, ‘Suzhou Municipal Several Provisions on the Construction of Trust Dossiers for Lawyers (Trial)’; Suzhou Municipal Bureau of Science and Technology, ‘Suzhou Municipal Credit Red- and Black-List System for Science and Technology’; Suzhou Municipal Bureau of Commerce, ‘Implementation Opinions on Joint Punishment of Persons Responsible for Untrustworthiness in the Domestic Service Field’.

<sup>88</sup> Wuxi Municipal People's Government, ‘Opinions on Strengthening the Construction of Trustworthiness Systems in the Joint Management of the Construction Industry and Project Bidding’; Wuxi Municipal People's Government, ‘Wuxi Municipal Measures for the Credit Rating Evaluation of Public Institutions (Trial)’; Wuxi Municipal Bureau of Urban Management, ‘Wuxi Municipal Measures for the Management of Untrustworthy Conduct in the Field of Urban Management (Trial)’.

<sup>89</sup> Credit Jiangsu, ‘Suzhou City: Actively Explore the “Suzhou Path” of City Credit Construction’.

<sup>90</sup> Suzhou Municipal Credit Office, ‘Zhenze Town in Suzhou's Wujiang District Creates a New Model for Rural Social Credit System Construction’.

municipal-level departments and county-level localities began integrating a suite of databases. By 2017, the city had coordinated a network of 11 information platforms, including smart city and social security systems, with credit data embedded in 23 local and 75 municipal institutions.<sup>91</sup> In more developed areas, these infrastructures have evolved into sophisticated networks. In Suzhou, for example, “one network” – the website Credit Suzhou – integrates with “two databases”, one for legal and one for natural subjects to create “one platform” that supports “two primary applications” (一网两库一平台、两大应用做支撑), namely “Qixintong” and the city’s “Osmanthus Points” system. “Qixintong” (企信通) (translated roughly as “business credit connect”) is Suzhou’s enterprise credit information platform, drawing on big data to provide decision-making support for companies, financial institutions and government. Assessing businesses across 11 different dimensions and 34 sub-categories, the system seeks to give early warning for potential credit risks through data-mining and analytics. By the end of 2020, it had collected more than 100 million pieces of credit data on more than 720,000 companies.<sup>92</sup> For many credit information centres, however, the social credit system is a much more manual technology. A core task at the local level has been to enforce a practice of “dual disclosure”, wherein officials log decisions on administrative permits and penalties not only in their own government terminals, but also within the social credit system’s networks. By the end of 2021, Wuxi had submitted over two million data points in this way, 1.86 million in reference to government licences and 160,000 on administrative punishments.<sup>93</sup>

Incentivisation is where local systems have historically been most creative in their interpretation and implementation of social credit. In principle, each city-level scheme again mirrors wider legislative setups, with a central set of joint rewards and punishments documents, with departmental and lower-level variations feeding in. In Suzhou, the *Implementation Opinions on Establishing and Improving Joint Rewards for Trust-Keeping and Joint Punishments for Trust-Breaking* were published in 2017, and by the end of 2020 had been supplemented with 99 other related documents to create a web of social credit enforcement.<sup>94</sup> Before reforms to the system in 2021, many of these auxiliary measures skirted the edges of what was really understood to be social credit (see Chapter Five). In Wuxi, the five general applications of CreditEase Plus (see Chapter Three) were expanded to cover 13 different areas from pensions, to inspections, government procurement, street-level social management, market trading and book-borrowing.

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<sup>91</sup> Xuzhou Municipal Credit Office, ‘Working Hard to Make Up for Shortcomings While Concentrating on Advantages, the Construction of Xuzhou’s Social Credit System Reaches New Heights’.

<sup>92</sup> CEIN, *Monitoring and Evaluation Report on the Status of China’s City Credit Construction (2019 Edition)*, 369–74.

<sup>93</sup> Wuxi Municipal Credit Office, ‘Consolidate the Basic System, Highlight Key Applications and Effectively Promote the Leapfrog Development of the Social Credit System’.

<sup>94</sup> Suzhou Municipal Credit Office, ‘Expand Breakthrough Innovation to Establish an Upgraded Version of City Credit Service Management’; Suzhou Municipal People’s Government, ‘Implementation Opinions on Establishing and Improving the Joint Rewards for Trust-Keeping and Joint Punishments for Trust-Breaking System’.

Five cities in Jiangsu province operate social credit points systems (see Chapter Three). The most famous of these – and indeed one of the first and most established schemes nationwide – is Suzhou’s “Osmanthus Points” (桂花分) programme. Citizens are scored out of 200 across five metrics covering basic information, social security payments and personal credit file entries on red- and black-listed behaviour. At its inception, “moral data” were also captured in the system, including number of hours volunteered or volume of blood donated, measures that have since proved controversial (see Chapter Five). Residents check their scores at self-service inquiry terminals, scanning their ID cards to bring up their osmanthus record. Points can then be used in exchange for a variety of city-wide perks, including deposit-free book-borrowing, subsidised travel on public transport and discounted entry to local tourism sites. At one point there was talk of an integration with ride-sharing platform DiDi, with drivers able to see a passenger’s osmanthus score before accepting a trip, but this does not appear to have materialised.<sup>95</sup> Gu Bin 顾斌, director of the Suzhou Municipal Credit Office has justified the creation of the city’s points system as the “invisible blood” (隐形血脉) of urban development, an essential tool that brings social credit to life in ways that integrate into ordinary life.<sup>96</sup> As discussed in Chapter Three, credit points are one of the more contentious components of the social credit system, despite being actively encouraged by CEIN and NDRC assessors in city rankings and the appointment of model systems.

Points systems are typical of the local-level innovation seen at the fringes of the social credit system and can be understood as a consequence of Lian Weiliang’s push for cities to develop the “final mile” of credit delivery.<sup>97</sup> In Jiangsu, a variety of grassroots schemes have emerged that tinker with social credit principles and technologies in the pursuit of local policy objectives. In Xuzhou, the *Implementation Opinions on Deeply Promoting Trust Construction in Street-Level and Town-Level Government Affairs* describe a “credit + civilisation + grid + N” system of credit management tools across Gaodang Village, Yaoji Town and Suining County, with a specific goal of poverty alleviation through a social credit system targeted at farmers.<sup>98</sup> The programme’s pilot saw the collection of 36,000 datapoints, with 565 citizens designated as “trustworthy” and 38 as “untrustworthy”.<sup>99</sup> Trustworthy villagers were given access to a special 1.8 million RMB credit line provided by the Suining Rural Commercial Bank, reportedly saving 4,000 RMB in interest rates. They also received free health check-ups, priority consideration in job applications and discounted haircuts, cinema tickets and dining options. It is not clear what, if any, restrictions were applied to the 38

<sup>95</sup> Suzhou Aunt Lou, ‘Didi Taxis Connecting with Suzhou’s “Osmanthus Points”!’

<sup>96</sup> Liu Weiwei, ‘Let Trust be Full of Fragrance: Suzhou Establishes its “Osmanthus Points” System of Personal Credit Evaluation’.

<sup>97</sup> Wang Wenbo, ‘Technology Ushers in a Period of Accelerated Implementation for City Credit Construction’.

<sup>98</sup> Xuzhou Municipal Credit Office, ‘Implementation Opinions on Deeply Promoting Trust Construction in Street-Level and Town-Level Government Affairs’.

<sup>99</sup> Xuzhou Municipal Credit Office, ‘Working Hard to Make Up for Shortcomings While Concentrating on Advantages, the Construction of Xuzhou’s Social Credit System Reaches New Heights’.

untrustworthy villagers. Similar programmes elsewhere in the district have been hijacked by external organisations presumably looking for a PR-boost to their corporate social responsibility profiles. Ant Financial – Alibaba’s fintech division – partnered with Xuzhou’s Fengxian County to create an “inclusive finance + smart county” (普惠金融 + 智慧县域) programme of rural financing for the hitherto un-banked.<sup>100</sup> The scheme saw a total of 3.8 billion RMB (530 million USD) of loans issued to 210,000 individuals and companies, while the data collected as part of the programme were also used to provide discounts on rents, hospital deposits, parking spaces and public transport for trustworthy entities.

## SHOCK TO THE SYSTEM

The development of the social credit system is a story of evolutionary adaptation to new governance demands and priorities. In no other instance was this more evident than the system’s response to China’s – and indeed the world’s – biggest policy challenge of recent decades, the COVID-19 pandemic.<sup>101</sup>

While the precise origins of COVID-19 remain contested on the international stage, the epicentre of the world’s first large-scale outbreak of the virus in early January 2020 centred on Wuhan, capital of Hubei Province. The first instance of an ‘unknown pneumonia’ was reported in the city on 8<sup>th</sup> December 2019. Yet despite a rising number of suspicious cases and repeated warnings from whistle-blowing medical professionals, local authorities were reluctant to react, instead admonishing those who had spoken up. Crucial windows of opportunity were squandered in the earliest and most effective period for containing the spread of the virus, a situation that was compounded by the mass movement of domestic travellers during Spring Festival. The Chinese government was slow in its initial response, withholding information from both the World Health Organisation and the general population, a decision that ultimately resulted in further transmission of the virus.<sup>102</sup> By the time President Xi Jinping had warned the public on 20<sup>th</sup> January – six days after central authorities had privately determined that a pandemic was likely – an additional 3,000 individuals had been infected, according to internal Party documents.<sup>103</sup>

Yet despite this lacklustre start, the Chinese state was quick to mobilise once the severity of the situation had become impossible to ignore. Three days after Xi’s warning, Wuhan was placed under a strict lockdown and the nation entered a so-called “people’s war” (人民战争) against the virus, in which citizens of all backgrounds from frontline

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<sup>100</sup> Credit China (Xuzhou, Jiangsu), ‘Inclusive Finance, Smart County’.

<sup>101</sup> This section draws on research conducted in the writing of Knight and Creemers, ‘Going Viral’.

<sup>102</sup> Associated Press, ‘China Delayed Releasing Coronavirus Info, Frustrating WHO’.

<sup>103</sup> Associated Press, ‘China Didn’t Warn Public of Likely Pandemic for 6 Key Days’.

medical personnel to journalists and food delivery staff would play their role.<sup>104</sup> The totality of China's governing apparatus was marshalled, from the Politburo down to the village committee.<sup>105</sup> On 20<sup>th</sup> January, the State Council launched its *Joint Mechanism for Prevention and Control*, a body tasked with smoothing over interdepartmental inefficiencies between all central and provincial ministries related to the public health emergency.<sup>106</sup> From the offset, however, the Chinese leadership recognised that the country's pandemic response would need to extend far beyond the realm of public health. On 25<sup>th</sup> January, the *Central Leading Small Group for Prevention and Control* was formed as the top decision-making body related to the pandemic, reporting directly to the Politburo Standing Committee and chaired by Premier Li Keqiang. Of the nine senior Politburo and State Council officials attending the Leading Small Group, only one had a background in public health – Sun Chunlan 孙春兰, through her portfolio as Vice Premier – while two members contributed their experiences in public opinion management and propaganda, including Wang Huning.<sup>107</sup> The importance of social management in China's pandemic response was underscored on 5<sup>th</sup> February with a speech by Xi Jinping at the 3<sup>rd</sup> meeting of the CCP Central Committee for Comprehensive Law-Based Governance.<sup>108</sup> The speech touched on China's legal and governmental response to the virus, rather than the unfolding public health crisis. Xi spoke of the need to not only introduce new legislation specific to the pandemic, for example bans on the wildlife trade, but also of the need to bolster existing institutions of enforcement and punishment to tackle a wide range of social ills, such as the manufacturing of counterfeit medical supplies and the spreading of rumours. The speech was a rallying cry for legislators and officials to adapt and redeploy existing systems of governance for the “people's war”. This call to arms rippled out across central and local government departments, with the official *Opinion* passed alongside Xi's speech forming the basis for hundreds of pieces of COVID-related legislation issued throughout the country.<sup>109</sup>

As the country mobilised for “total war” (总体战), China's social credit system would play its part.<sup>110</sup> At least 15 provinces and 19 municipalities across the country circulated updates to their local social credit systems in direct response to the coronavirus.<sup>111</sup> Each of

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<sup>104</sup> Li, ‘China Is Dispatching Journalists to Tell the Coronavirus Story It Wants Its People to Hear’; Yang, ‘China's Food Delivery Workers Are Lifeline in Coronavirus Outbreak’.

<sup>105</sup> He, Shi, and Liu, ‘Crisis Governance, Chinese Style’.

<sup>106</sup> Xinhua, ‘Sun Chunlan Presides over State Council Meeting on Mechanisms of Joint Prevention and Control of the Pneumonia Epidemic Caused by the Novel Coronavirus’.

<sup>107</sup> The other was Huang Kunming 黄坤明, head of China's Propaganda Department.

<sup>108</sup> Xi Jinping, ‘Comprehensively Increase the Power of Rules-Based Prevention and Control and Rules-Based Governance to Provide Strong Legal Protection for Epidemic Prevention and Control’.

<sup>109</sup> Central Committee for Comprehensive Law-Based Governance, ‘Opinions of the Central Committee for Comprehensive Law-Based Governance on the Prevention and Control of the Novel Coronavirus in Accordance with the Law, and the Effective Protection of the People's Life, Health and Safety’.

<sup>110</sup> Qian, ‘The Trouble with “Total War”’.

<sup>111</sup> At the provincial level, social credit legislation was issued in Anhui, Guangdong, Guangxi, Hebei, Heilongjiang, Henan, Hunan, Jiangsu, Jiangxi, Jilin, Qinghai, Shaanxi, Shandong, Sichuan and Zhejiang. At the municipal level, documents were published in Anshan, Fuzhou, Guyuan, Hangzhou, Huai'an, Nanjing, Nanning,

these localities in turn published varying numbers of documents across all levels of government, elaborating further on how social credit would be used in the fight against the pandemic.

In Jiangsu, this process began on 8<sup>th</sup> February with a meeting of the provincial CCP Standing Committee at which a *Decision on Prevention and Control* was published.<sup>112</sup> The document called on officials across the province to “form a cross-department, cross-level and cross-regional prevention and control system” that “makes full use of big data and other information technologies” to stop the spread of the virus. Three days later on 11<sup>th</sup> February, deputy director of the PDRC Qi Biao 祁彪 summoned colleagues from the provincial Credit Office and Public Credit Information Centre for an emergency meeting on their response to this call to arms.<sup>113</sup> The meeting concluded with the publication of a *Notice on the Submission of Trust-Breaking Lists for the Prevention and Control of the Novel Coronavirus*, requesting all provincial departments and localities to prepare and submit updates to their relevant social credit systems.<sup>114</sup> On 18<sup>th</sup> February, the PDRC followed this up with a *Notice on Effectively Strengthening Credit Management and Services in Response to the Impact of the Novel Coronavirus Epidemic*, outlining 17 key tasks for the social credit’s redeployment.<sup>115</sup> Within one month, 24 cities and districts issued COVID-related amendments to their social credit systems, creating a “combined fist” (组合拳) in the fight to contain the virus and its impact on society at large.<sup>116</sup> A survey of these documents reveals three broad themes; a tightening of some punishment measures, a relaxing of others, and the system’s retooling to provide targeted relief.

The first and perhaps primary instinct of the Credit Office was to double-down on the system’s regulatory capacity and reinforce its ability to restrict behaviours that might run counter to the pandemic prevention effort. The provincial *Decision on Prevention and Control* instructed departments to include non-compliance with facemask-wearing, stay-at-home notices, quarantining or medical treatment in their punishment systems, while also targeting the spread of misinformation and rumours.<sup>117</sup> For the first time, criminal records were also

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Ningbo, Quzhou, Rongcheng, Shanghai, Shenzhen, Shijiazhuang, Taizhou, Wenzhou, Yangzhou, Yulin, Zhangzhou and Zhucheng. See Knight and Creemers, ‘Going Viral’.

<sup>112</sup> Jiangsu Provincial People’s Congress Standing Committee, ‘Decision on Preventing and Controlling the Pneumonia Epidemic of Novel Coronavirus Infections in Accordance with the Law to Effectively Protect the People’s Lives, Health and Safety’.

<sup>113</sup> Li Ruizhe, ‘Multiple Cities from Across Jiangsu Province Attach Great Importance to the Use of Credit Management Mechanisms in the Prevention and Control of the Novel Coronavirus Epidemic’.

<sup>114</sup> Jiangsu Provincial Credit Office and Jiangsu Provincial Public Credit Information Centre, ‘Notice on Submitting Lists of Untrustworthy Subjects in the Prevent and Control of the Novel Coronavirus Epidemic’.

<sup>115</sup> Jiangsu Provincial Development and Reform Commission, ‘Notice on Effectively Strengthening Credit Management and Services in Response to the Impact of the Novel Coronavirus Epidemic’.

<sup>116</sup> Jiangsu Provincial People’s Government, ‘Press Conference on Furthering the High Quality Development of the Provincial Social Credit System’.

<sup>117</sup> Jiangsu Provincial People’s Congress Standing Committee, ‘Decision on Preventing and Controlling the Pneumonia Epidemic of Novel Coronavirus Infections in Accordance with the Law to Effectively Protect the People’s Lives, Health and Safety’.

inputted into credit files; pre-COVID, the social credit system in Jiangsu had included information only on administrative issues and run-ins. A new *Notice on Further Improving Joint Punishment of Persons Responsible for Trust-Breaking Behaviours that Seriously Endanger Normal Medical Order* instructed that individuals with convictions for medical-related crimes would be added to provincial black-lists.<sup>118</sup> The system was also strengthened in the field of market regulation. Credit Office documents emphasise the use of social credit mechanisms to target counterfeiting and the sale of fake drugs and medical equipment, transportation hindering the emergency services, and the trade in wild animals.<sup>119</sup> Conscious of the economic impact of China's lockdown measures, provincial documents also anticipated the system's use in providing market stability through targeted measures against price gouging, hoarding and other monopolistic behaviours that could hinder the supply of medical and food essentials. Local schemes in Wuxi, Xuzhou, Nantong, Lianyungang and Huai'an replicated these updates with their own tweaks to municipal joint punishments covering both individual and market behaviours.<sup>120</sup>

While some aspects of the social credit system were tightened in response to COVID-19, others were relaxed in consideration of the unique pressures facing credit subjects. The PDRC's own *Notice on Strengthening Policy Support and Fully Promoting the Resumption of Business Work and Production* mentioned the need not only for strictness but leniency.<sup>121</sup> It encouraged relevant departments to show compassion for businesses who might slip into black-listing territory – for example in the delivery of services, non-payment of national insurance premiums and taxes, breaches of contract or other untrustworthy behaviours – on account of the *force majeure* of the pandemic. It suggested extending notice periods and even suspending black-lists altogether. In Yancheng, small businesses were given a loan repayment holiday to prevent defaults and black-listing.<sup>122</sup> In some locations, other elements of the social credit system were also paused so as to ease potential impediments to the state's COVID response. In Nanjing, for example, companies engaged in epidemic-related

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<sup>118</sup> Jiangsu Provincial Bureau of Public Security and Jiangsu Provincial Health Commission, 'Notice on Further Improving Joint Punishment of Persons Responsible for Trust-Breaking Behaviours that Seriously Endanger Normal Medical Order'.

<sup>119</sup> Jiangsu Provincial Development and Reform Commission, 'Notice on Effectively Strengthening Credit Management and Services in Response to the Impact of the Novel Coronavirus Epidemic'.

<sup>120</sup> Xuzhou Municipal Credit Office, 'Notice on Effective City-Wide Credit Work During Epidemic Prevention and Control'; Wuxi Municipal Credit Office, 'Notice on Strengthening Credit Work During Epidemic Prevention and Control'; Nantong Municipal Credit Office, 'Nantong Municipal Government's "Twelve Policy Opinions" on Fully Responding to the Epidemic and Supporting Business Development'; Huai'an Municipal Credit Office, 'Huai'an Municipal Implementation Measures for Joint Punishment of Personal Untrustworthiness in the Prevention and Control of the Novel Coronavirus Epidemic'; Lianyungang Municipal Credit Office, 'Notice on Joint Punishments for Untrustworthiness in Municipal Prevention and Control of the Novel Coronavirus Epidemic'.

<sup>121</sup> Jiangsu Provincial Development and Reform Commission, 'Notice on Strengthening Policy Support and Fully Promoting the Resumption of Business Work and Production'.

<sup>122</sup> Credit China, 'Yancheng Municipal Justice Bureau's Ten Measures to Support Small and Medium-Sized Enterprises in Fighting the Novel Coronavirus Epidemic'.

production were no longer subject to environmental checks on pollutants.<sup>123</sup> The provincial government used the pandemic as an opportunity to accelerate its credit repair efforts in an attempt to clear a backlog of black-listed companies now under even more pressure. The provincial Credit Office launched a new and improved “convenient channel” (便捷通道) for streamlined corporate credit repair, de-black-listing some 1,175 entities out of 1,390 applications within its first month.<sup>124</sup> Yancheng assured businesses in the city that they would expedite all credit repair applications to a one-day turnaround time.<sup>125</sup> Among Lianyungang’s 22 policy announcements for business support during the pandemic was the optimisation of a “one-stop-shop” credit repair mechanism.<sup>126</sup>

The final re-appropriation of social credit in Jiangsu’s fight against COVID-19 was as channel for the funnelling of economic support. A PDRC Notice from 20<sup>th</sup> February outlined the use of social credit management and services to protect supplies, stabilise the economy and aid businesses in their recovery.<sup>127</sup> Beyond the black-list related measures outlined above, this document promoted the idea that the system could be used to help get money to companies that needed it in the post-pandemic period. Cities across the region lent out vast sums of money to small businesses, with Wuxi alone channelled three billion RMB (420 million USD) of financing to local companies through a redeployment of its CreditEase Loans system.<sup>128</sup> In Suzhou, the “Qixintong” platform was used to assess company eligibility for state-provided rebates related to job stabilisation. Credit information held on the platform allowed for quicker assessment, dramatically simplifying the approvals process and ultimately getting money to the 133,000 affected companies and their 1.2 million employees faster.<sup>129</sup>

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<sup>123</sup> Nanjing Municipal Ecology and Environment Bureau, ‘Notice Issuing “Exemptions for Environmental Untrustworthy Conduct During the Prevention and Control of the New Coronavirus Epidemic”’.

<sup>124</sup> Luo Peng, ‘Multiple Localities and Departments across Jiangsu Form a “Combined Fist” of Credit Management Policies for Epidemic Prevention and Control’.

<sup>125</sup> Yancheng Municipal Finance Bureau, ‘Municipal Finance Bureau Fully Implements Multiple Policy Measures in Support of SMEs in Overcoming Difficulties’.

<sup>126</sup> Lianyungang Municipal People’s Government, ‘Lianyungang Issues 22 “Business-Friendly” Measures to Support Enterprises in Overcoming Difficulties and Achieve Development’.

<sup>127</sup> Jiangsu Provincial Development and Reform Commission, ‘Notice on Effectively Strengthening Credit Management and Services in Response to the Impact of the Novel Coronavirus Epidemic’.

<sup>128</sup> Wuxi Municipal CCP Committee and Wuxi Municipal People’s Government, ‘Policy Opinions on Responding to the Novel Coronavirus Epidemic through Supporting Enterprises to Overcome Difficulties and Ensuring the Smooth Operation of the Economy’.

<sup>129</sup> Suzhou Municipal Development and Reform Commission, ‘Ten Policy Opinions in Support of Service Industry Enterprises to Overcome the Difficulties of the Novel Coronavirus Epidemic’; Li Ruizhe, ‘Multiple Cities from Across Jiangsu Province Attach Great Importance to the Use of Credit Management Mechanisms in the Prevention and Control of the Novel Coronavirus Epidemic’.

## CONCLUSION

Jiangsu's COVID response provides a clear example of how social credit policy is activated and adapted across the whole spectrum of the Chinese system. It highlights the flexibility of social credit's application in response to the policy exigencies *du jour*, its structure allowing for top-down directives to ripple across horizontal and vertical axes of governance networks. At its lower levels, in particular, its devolved nature allows for maximum tinkering in accordance with local needs, whether in the provision of finance during times of economic hardship, trust culture construction through the circulation of credit points, regulation of site-specific industries, poverty alleviation in rural areas, or big data-driven systems for better corporate risk assessment and management. Jiangsu also provides an informative case study of localised piloting gone wrong in the form of Suining County. The structural strength of networks comes from the ability for one node to falter without impacting the wider system; information and power is simply rerouted. The siloeing of boundary-pushing iterations of the system in this way has allowed for sometimes extreme forms of experimentation, all while shielding higher-ups from criticism if and when things go wrong. Cynics – and indeed many central planners and legal scholars, as I will show in Chapter Five – see many of these experiments, most notably city points, as surface-level developments that merely pay lip-service to social credit's lofty “civilising” goals. At best, they do little to contribute to the system's broader regulatory agenda; at worst, they detract from its usefulness and undermine its legitimacy. Yet, at the provincial level, officials have remained committed to social credit, believing in its power as a technology for policy implementation.

By the NDRC's own metrics, the “Jiangsu Model” has proved highly successful. The province is over-represented in national rankings of municipal social credit systems, lists of model cities and in awards nominations. Jiangsu has served as a petri dish for the development of social credit practice. The province has built a rich network of dedicated social credit institutions across all levels of government, constructing a legislative framework that has proved consistently ahead of not only other regions but even national-level planning. Its credit information databases are almost unrivalled in terms of the depth and breadth of their inter-departmental and cross-regional integrations, underpinning a highly-developed yet devolved system of corresponding rewards and punishments. Jiangsu's practical experiences have fed back into national social credit theory-making. The province has participated in a number of central government research projects led by the NDRC. In 2021, it was asked to help draft the central *Guiding Opinions on the Construction of an Integrated National Credit Information Sharing Platform*.<sup>130</sup> In total, Jiangsu has contributed to more than 40 separate insight initiatives, covering everything from rural social credit construction to the setup and maintenance of public credit information centres, welcoming

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<sup>130</sup> NDRC, ‘Guiding Opinions on the Construction of an Integrated National Credit Information Sharing Platform’.

ministries and municipalities from across the country to learn from the Jiangsu Model for themselves.<sup>131</sup>

As I will show in the third and final section of this thesis, Jiangsu has not, however, been immune to the wider pressures on social credit. This chapter has primarily covered developments in the technology at the provincial level from its launch through to the end of 2020. The COVID-19 pandemic clearly marked an important moment in the system's overall arc, an opportunity for reflection that coincided with the conclusion of both the 2014-20 central *Planning Outline* as well as the provincial five-year roadmap for social credit construction. The system would change significantly from this point onwards, as the NDRC made a concerted effort to curtail some of its more extreme excesses at the local level through a recentralisation of decision-making, as hinted at earlier in this chapter. Chapter Five documents social credit's post-COVID "reform period" from the perspective of central government. It also, however, draws on numerous examples of system innovation first trialled in Jiangsu, further underscoring the importance this province continues to have in social credit's evolution.

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<sup>131</sup> Jiangsu Provincial Credit Office, 'Jiangsu's Provincial Credit Management System is Continuously Improving'.

