

The Global South Labour That Runs the Modern AI Economy: A Case for BRICS Stewardship

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Abstract

COUNTRIES OF THE GLOBAL SOUTH bear a disproportionate share of the development costs of artificial intelligence (AI), both as suppliers of data labour and as the primary sites where emerging systems are deployed, tested, and iterated upon. This asymmetry between the Global North and Global South reflects patterns of technological extraction where the South absorbs risk while value accrues elsewhere. Can BRICS operate as a forum to help close this AI development gap? This article explores the common frameworks that could enable BRICS member states to leverage their structural position as primary suppliers of data labour in the global AI supply chain. It examines the mechanisms that could translate these frameworks into model standards that advance the protection and well-being of this data labour, recognise it as a critical component of the global AI stack, and enable responsible AI development.



Introduction: What Is Data Labour?

A news story in late May 2026 illuminated a disturbing reality for the future of Indian labour.¹ Workers in a textile factory in Western India were made to strap cameras to their foreheads as they worked. The cameras were meant to capture their every move, and the workers could only take them off during toilet and lunch breaks. This data extraction was intended to train future robots that could soon replace these very workers.² Such invisible data labour^a is critical to the artificial intelligence (AI) global supply chain,³ and is disproportionately sourced from the Global South,⁴ contributing to what scholars have called “data colonialism”.⁵ In their book *Data Grab: The New Colonialism of Big Tech and How to Fight Back* (2024), Ulises Mejias and Nick Couldry argue that the labour that goes into training AI systems is frequently performed by people in need in the Global South.⁶ This unequal relationship between the people who perform this labour and the ones who benefit from it replays the global division of labour that is a long-term colonial legacy.

Machine learning systems such as large language models (LLMs) process high volumes of human-generated data to train their algorithms to mimic human language, tone, and behaviour.^{7,8} Data labellers teach them to distinguish between text and images, and understand the human physical and linguistic world.⁹ For instance, cameras on driverless cars can recognise a pedestrian crossing because humans have helped these systems learn to do so. An explanation for this is data annotators sort large quantities of captured video from streets around the world into categories such as pedestrian crossing, lamppost, and traffic lights. This labelling helps AI algorithms learn about the physical world.

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- a Data labour’ is a concept that entails the generation, labelling, management, and moderation of data for various digital services. This labour includes the work that users put in to train algorithms on social media feeds; the labour of labelling data to train modern-day AI models; it can be the ego-centric data that is generated by people who record themselves performing everyday chores to train AI robots; and it includes the labour of human content moderation that keeps online feeds clean and safe. As the AI economy evolves, there may be more functions feeding into the digital services and AI stack that relies on human labour for creating and maintaining digital services. This labour is informal and highly precarious. This article uses ‘data labour’ or ‘data work’ to denote work that directly feeds into the development of the AI stack: data labelling and ego-centric data collection for robot training. But since data workers might perform many jobs in a day and their relationship with providers does not change based on the type of work, readers must keep the broader data labour ecosystem framing while assessing challenges and policy solutions.



This training, known as ‘ghost work’, often exploits economic and social conditions in less-developed countries such as India and South Africa, using labour and regulatory arbitrage to access on-demand labour.^{10,11} While this labour is globally distributed, it is disproportionately concentrated in the Global South. BRICS members can make this data labour visible to highlight the critical role their populations play in developing the global AI stack.

How Data Labourers Are Exploited

The market for exploitative data labour in the form of gig work is not new, especially for dominant technology firms like Meta.¹² To keep their social media platforms such as Facebook and Instagram free from violent and hateful content, they subject human content moderators sitting in countries like Kenya or Colombia to unreasonable working hours and harsh working conditions.¹³ This exploitative archetype is now being used to train AI models and future robots. The management of these gig workers, whether for food delivery or data annotation, is often delegated to opaque algorithms, which can cut pay, suspend contracts, and penalise them for low performance.¹⁴ This type of management often results in physical, psychological, and sexual harm.¹⁵

In Kenya, for instance, data workers have initiated a class action lawsuit against Meta and Sama (a sub-contractor) for workplace abuse.¹⁶ In India, where labour regulation and welfare laws are weak, wages are abysmally low, and workers often migrate to urban spaces for jobs, data work is promoted with a promise of dignity and safety, but ends up serving commercial goals rather than offering meaningful dignity to the labourers.¹⁷ A 2021 report by the National Association of Software and Service Companies (NASSCOM) predicts that by 2030, around one million workers could be engaged in data work in India.¹⁸ Analysts have pointed out that in countries like India, which is home to the world’s largest share of online gig workers,^{19,20} highly precarious data work is largely carried out by women, who have little bargaining power, if at all, and are exposed to physical and mental abuse.^{21,22}

Similarly, while the rise of platform work in, say, South Africa, could provide economic opportunities, it also leads to certain challenges for workers. A comparative study of food courier motorbike riders in Accra (Ghana), Johannesburg (South Africa), and Nairobi (Kenya),²³ highlighted a new form

of precarious work undertaken predominantly by men working long hours with no paid leave or social security benefits. The study found that these riders faced constant risks of accidents and harassment, while the hiring companies do not provide even basic occupational health and safety protection. While these harms are evident in the case of platform labour, data work is an extension of the same economy and is bound to follow a similar trajectory, unless safety is woven into the architecture right from the inception stage.

Workers who sustain AI systems are not peripheral actors; they form the foundation of the entire AI supply ecosystem. The data labour problem primarily concerns labour governance issues, with millions of workers facing poor conditions such as low wages and weak protections.²⁴ Technology firms exploit platform-based labour by outsourcing tasks globally, often classifying workers as independent contractors, thus limiting their access to essential rights and protections.²⁵ Algorithmic administration exacerbates these vulnerabilities, utilising rating systems and automated decisions to control workers without traditional employer obligations.²⁶ This leads to the “invisibilisation of labour”, where substantial economic contributions remain undercompensated and anonymous.²⁷ Although the International Labour Organization (ILO) promotes initiatives to protect worker rights, there is currently no comprehensive international legal framework for data labour.²⁸ As a result, regulatory inconsistencies leave many workers exposed to exploitation.

Regulatory and Policy Gaps: India and South Africa

Exploitative acts towards data labour do not emerge in a vacuum. Rather, they are enabled, and often intensified, by gaps in existing labour and regulatory frameworks. Although platform behaviour plays an important role, labour exploitative harms cannot be solely attributed to that; regulatory lacunae also contributes.

India and South Africa illustrate this issue.^{29,30} While the two have different labour histories, their existing labour law frameworks were largely designed around a conception of employment that largely presupposes an identifiable employer–employee relationship.³¹ Data labourers often do not fit this mould



as they work through intermediary platforms and are often classified as independent contractors, thereby getting excluded from the protections that formal employment status would confer.^{32,33,34}

India

In India, the Code on Social Security (CSS) represents a meaningful first step to extend certain protections to the unorganised labour force, including gig and platform workers.³⁵ The CSS formally acknowledges, for the first time, that these categories of labour exist and warrant recognition. It defines gig workers as those who perform work outside the traditional employer–employee relationship, and platform work to mean a work relationship negotiated via an online platform.³⁶ It allows the Government of India to frame welfare schemes for gig and platform workers covering health benefits, old-age protection, education, and life cover (including other benefits decided by the central government), and envisions the creation of a social security fund partially contributed to by aggregators.³⁷

While it is proceeding in the right direction, in practice, the CSS remains inoperative in India at the time of writing, with welfare schemes for gig and platform workers awaited. Its coverage also remains uncertain. The schedule lists categories of work eligible for social security contribution by aggregators but does not account for newer forms of work such as data annotation or training AI models, including robots. Commentators have also pointed out obstacles even for traditional gig workers regarding implementation, disregard of disguised employment,^{b,38} the optional nature of social security,³⁹ mandatory registration for all gig and platform workers,⁴⁰ and non-recognition of multi-platform work.⁴¹

Data labourers comprise a particularly vulnerable subset of this workforce, yet they remain effectively invisible both within these projections and the policy architecture that surrounds them. This is a structural omission that has governance consequences, given that workers who remain statistically uncounted will, in practice, remain unrepresented in policymaking.

b Disguised employment': the disguising of the employment relationship between online platforms and workers. Although often of contractual nature, often online platforms singlehandedly determine the terms and conditions of the contract between them and the workers.

As a social security code, CSS's scope is confined to welfare protection and does not address working conditions. Challenges such as opacity of algorithmic task allocation, mandatory non-disclosure agreements,⁴² unilateral changes to pay structures, or the psychological toll of moderation work are outside its ambit by design. Addressing these may require a separate, specialised instrument, or making changes to other labour laws. None of the codes and regulations operational in India currently were designed with the specificity of data labour.

South Africa

In South Africa, platform- or gig-based work provide 'self-employment' opportunities for many young people desperate for an income. Drawing on the traditional gig economy, with promises of 'flexibility' and 'freedom', the platform companies lead workers to believe they are in a 'partnership', as opposed to simply being employed. This platform business model has transformed the employer–employee relationship and undermined worker rights.⁴³ It is also probable that high unemployment levels in South Africa influenced these companies to avoid South African national labour regulations by presenting themselves as technology intermediaries rather than geographically tethered service providers.⁴⁴

A proposed amendment 50A to the Basic Conditions of Employment Act of South Africa,⁴⁵ introduced in 2025, represents a potentially significant step. It incorporates expanded definitions of 'employer' and 'employee' that could extend labour protections to platform workers. However, the discussion around the platform economy is still "like a battlefield,"⁴⁶ and the amendment itself is pending.

Like the CSS in India, the amendment 50A does not establish a framework to address platform or gig sector-specific working conditions. While classifying data labourers as 'employees' would extend them basic social security, the specific harms around data work will remain unaddressed, as they require dedicated regulatory interventions.



The Fairwork project's evaluation of digital labour platforms across both India and South Africa confirms the scale of the regulatory gap.⁴⁷ Only 25 percent of evaluated digital labour platforms ensured payments to their workers that were at least equivalent to the minimum wage, and offered health and safety protections or transparent appeal processes, with fewer than 10 percent recognising freedom of association. Data labourers are bound to be subjected to the same platform logic, which remains informal, unbundled, jurisdictionally ambiguous, but with even less visibility and without any monitoring or regulatory attention similar to the Fairwork project.

Why Data Labour Protection Is Important for BRICS

The implications of the data labour model extend beyond worker welfare and are directly relevant to the strategic interests of BRICS countries. Muldoon et al. (2024) highlight “AI data work” as essential for AI development, raising important concerns for labour rights.⁴⁸ This issue affects data sovereignty, technological growth, governance, and geopolitical relations as well. Heylyung Yun (2024) emphasises the need for a nuanced digital governance approach that transcends the simplistic competition-versus-cooperation paradigm, illustrating how geographical boundaries are mirrored in cyberspace through diverse data practices.⁴⁹

The BRICS nations, as some of the key global emerging economies, play a critical role in the global AI landscape. They serve as leading suppliers of AI labour, and are major emerging consumer markets and innovation hubs.⁵⁰ Their growing influence in global governance underscores the need to incorporate their perspectives into frameworks to protect citizens and manage data responsibly. Recent BRICS declarations, especially the 2025 Rio Leaders' Statement on the Global Governance of AI (BRICS AI Statement 2025),⁵¹ emphasise AI governance and digital sovereignty, aiming for inclusive digital development and equitable technology transfer.

However, Couldry and Mejias (2024), and Kate Crawford (2021) warn that if the global digital and AI economy concentrates power in a few countries and corporations while positioning much of the Global South as resources, labour, and data suppliers rather than decision-makers, the South may remain merely



a supply source, with limited say in governance, thus perpetuating existing inequalities.^{52,53} This article argues that BRICS members should proactively engage in drafting key protocols that protect their economic and regional priorities regarding AI development.

The Current Gap in BRICS

Regulatory shortcomings at the national level are mirrored by similar limitations at the multilateral level. BRICS declarations have progressively engaged with AI governance, including, most notably and recently, the BRICS AI Statement 2025,⁵⁴ which represented a meaningful advance. Among other commitments, the declaration affirmed that AI poses risks to working conditions, work intensity, job displacement, and threats to employment and workers' dignity. It stresses the importance of safeguarding the rights and well-being of all workers, particularly those directly affected by digital transformation. While largely framed from the perspective of future readiness, it signals a welcome shift from labour being positioned as an afterthought to having an acknowledged stake in global governance discourse.

However, the 2025 Statement stops short of specifically naming data labour or proposing concrete, implementable mechanisms to operationalise its commitments towards workers in the global AI supply chain, such as model protocols, common principles for compensation, or occupational standards. In this context, the upcoming India BRICS summit in September 2026 is an opportunity to frame data labour as a matter of digital sovereignty and an important contributor to the global AI supply chain. This invisible labour force is critical to the development and maintenance of AI systems and helps counter dominant nations' claim of being the deserving creators, managers, and beneficiaries of technological development. This recognition of data labour will also help the supplying countries negotiate an equal seat at the table in the development, governance, and deployment of emerging technologies.

Globally, the International Labour Organization (ILO) is the primary institution with the mandate, expertise, and universal reach to set global labour standards, which become binding on member states upon ratification. The ILO Convention No. 193 on Decent Work in the Platform Economy,⁵⁵ adopted in June 2026, sets the first international labour standard for platform work.⁵⁶



The definitions in it are broad enough to cover platform work, “regardless of whether that work is performed online or in a specific geography.”⁵⁷ If ratified under state jurisdictions, this could act as a pushback towards the ‘digital platforms as technological intermediary’ defence that have been used in the past and would bring data annotation and other AI supply chain work within its ambit.⁵⁸

In-principle formal coverage, however, often does not turn into enforceable protection. This is where BRICS holds a comparative structural advantage over ILO, especially for the Global South. Currently, the success of the ILO Convention No. 193 stands contested in the Global South, with the Indian government notably abstaining from voting on it and South Africa voting in its favour.^{59,60} A platform like BRICS, centred on negotiating economic and political interests among its members, becomes a more effective platform to build consensus among countries on the direction of data labour. BRICS can directly negotiate a political buy-in on Global South data-labour-supplying states. A labour protocol negotiated among the supplying members themselves would not just be more representative of their interests and participatory in nature but would be practically enforceable. This kind of protocol should therefore be charted out in tandem with the evolving ILO considerations on data work to supplement structural thinking with practical enforceability.

Recommendations

While this article has highlighted the precarity of data work within the global AI supply chain, it does not argue that such work should be ceased. Rather, it suggests that working conditions should be regulated in the interests of worker dignity and well-being, as recognised by the BRICS AI Statement 2025.

BRICS should move beyond declarations towards tangible commitments by putting in place structures like a Digital Labour Protocol, a model instrument developed by and for Global South countries. This could become a tangible instrument to advance data labour protection standards as well as a strong positioning mechanism for Global South actors to proactively set their own priorities rather than adopt them from the Global North.



Strategic Policy Recommendations

A more concrete set of policy interventions is required to translate these principles into action. BRICS nations should pursue five strategic priorities to embrace their agency and transform their position from AI input providers to governance partners:

Create a BRICS Data Labour Protocol

BRICS should develop a dedicated Data Labour Protocol to address the gaps in the ILO Convention 193. While some data labourers may fall within the Convention's protection if their work coincides with platform work, in its current form it does not directly address issues around data labour. More importantly, the convention itself only becomes effective if ratified by countries. The convention also does not recognise AI data labourers, including data annotators, content moderators, model evaluators, and supply-chain workers as a distinct category, leaving them vulnerable to AI-supply-chain-specific risks like psychological harm from repeated exposure to distressing content, opacity in algorithmic task allocation,⁶¹ and non-disclosure agreements restricting worker concerns.

BRICS should introduce a model Data Labour Protocol drawn up collaboratively by member states that is representative of member interests and practically implementable. The adoption could be voluntary to start with and eventually be phased into a more solid, region-specific set of data labour protocols across member nations.

The protocol should include explicit recognition of AI data workers, as a distinct category that requires targeted protection against occupational hazards. It should also establish standards for occupational health, grievance redressal, fair wages, right to form associations, and other labour rights, such as severance packages and mental health support.

This protocol fits within BRICS' existing economic and industrial policy priorities. BRICS has historically convened around trade, investment, and value-chain positioning for its member economies; data labour represents the digital economy manifestation of the same asymmetry BRICS has long sought to correct in commodities and manufacturing, where Global South



states supply low-paying inputs while value concentrates elsewhere. In this context, the envisioned protocol is not an expansion of BRICS' scope but an application of it to a new and rapidly growing sector.

Reform Labour Laws

The BRICS Data Labour Protocol or any intervention made will only have an impact if it is adopted into the national legislation, particularly by India and South Africa. This would ensure that both the Indian CSS and the South African Basic Conditions of Employment Act evolve keeping data labour as a recognised category. These social security reforms should be developed in tandem with the labour protocol to establish a clear and enforceable set of guidelines for this new emerging employer-employee relationship. Governments, particularly in these two countries, should reform labour laws to support better data collection for platform-based workers, recognising their status as distinct from traditional employment models. This involves extending rights and benefits to independent contractors and implementing mandatory registration for all gig workers to aid in tracking and representation

Strengthen Digital Sovereignty

Digital sovereignty is a top priority for the Global South, including the BRICS countries.⁶² As the United States (US) exerts its technological dominance through export control and supply-chain sanctions,^{63,64} other nations are keen to enhance their self-sufficiency.⁶⁵ Investing in domestic AI capacity is sound public policy, but countries need to rationalise the extent of self-reliance when it comes to a truly global AI supply chain. For instance, India joining the US-led Pax Silica initiative to consolidate the supply chain for critical AI resources might be strategic, but does not bolster its digital sovereignty claims.⁶⁶

The AI supply chain is globally distributed by design.⁶⁷ NVIDIA and Apple have built trillion-dollar businesses because they outsourced manufacturing capacity to manufacturers like TSMC in Taiwan.⁶⁸ The most advanced lithographic machine needed to make cutting-edge semiconductors only comes from one factory in the Netherlands,⁶⁹ and data-centre capacity is still concentrated within Big Tech firms.⁷⁰ For building modern AI models, NVIDIA not only controls the physical supply of advanced chips but runs its chips exclusively on proprietary software.⁷¹ In this scenario, BRICS nations





must be creative about supply chain diversification and closely coordinate to protect against risks of concentration. Instead of traditional notions of state sovereignty, they could explore “commons digital sovereignty,”⁷² which advances the concept of collective production of digital public goods.

They must build on their existing strengths, for instance, China’s semiconductor production or India’s software expertise and distribute critical components of the AI stack in public interest across the Global South.⁷³ A Digital Labour Protocol could operate in a similar manner by establishing ethical and labour protective tools and agreements to enhance resilience and diffuse concentration. Building on innovative proposals such as the BRICS Platform on Digital Public Goods,⁷⁴ a repository for all open-source technology applications created by BRICS members, AI sovereignty must be a shared goal met by collaboration and coordination, and in the interests of the people of the Global South.

Harmonise BRICS Positions in AI Governance

BRICS members should coordinate their positioning across global and multilateral processes and forums to create a united position on data labour and their participation in it. Currently, engagements by member states remain scattered and uncoordinated. A unified front could strengthen their supply-side position as a whole. Countries that provide substantial AI labour should have a proportionate voice in establishing the rules governing the global AI economy.⁷⁵ While harmonising may not, and should not, mean identical domestic policies, given the diversity of experiences and contexts among nations, a shared understanding on fundamental priorities could be a solid structure.





Taken together, these recommendations point towards a broader vision of equitable participation in the AI economy. Through coordinated action on labour standards, digital sovereignty, AI governance, infrastructure development, and multilateral reform, BRICS can transform the Global South from a site of digital extraction into a co-author of the future digital order.

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