



# UNIONS IN ACTION TO END VIOLENCE AND HARASSMENT IN THE WORLD OF WORK:

RESULTS OF ITUC 2024 SURVEY ON ILO CONVENTION 190

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## **ACKNOWLEDGEMENTS**

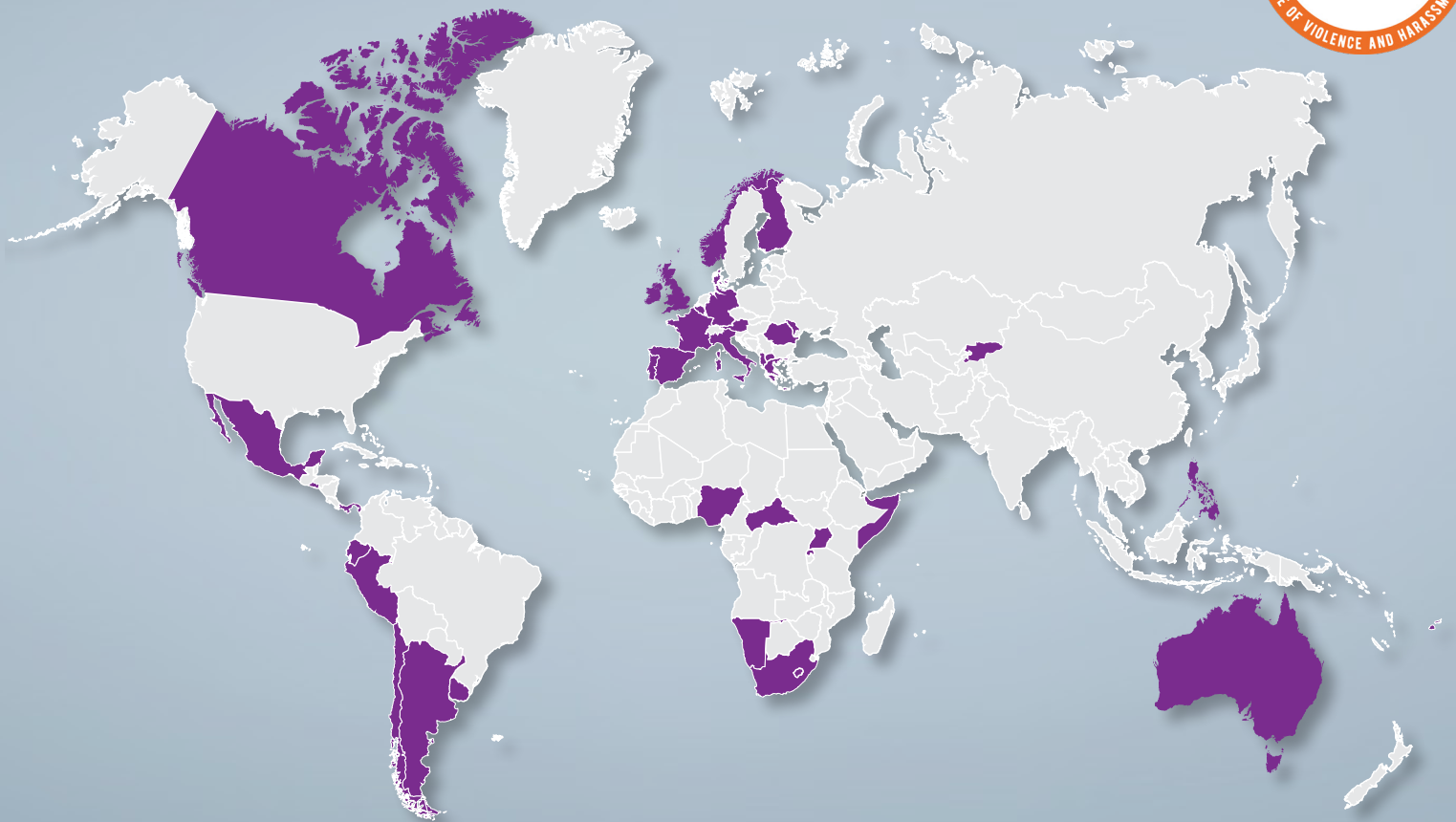
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## INTRODUCTION

This report commemorates the fifth anniversary of the adoption of ILO Convention 190 (C190). As of November 2024, 45 countries have ratified C190, with many more planning to do so. Trade union action, in collaboration with progressive alliances worldwide, has generated momentum towards establishing workplaces free from violence and harassment.<sup>1</sup>

Ending violence and harassment through a gender-transformative approach has been a central pillar of the ITUC campaign for the ratification and implementation of C190.<sup>2</sup> This campaign has been built through the inspiring work of affiliates in their campaigns, advocacy, and bargaining initiatives to create a world of work free from violence and harassment.

## ILO VIOLENCE AND HARASSMENT CONVENTION



■ COUNTRIES WHICH RATIFIED C190

<sup>1</sup> See “Violence and harassment in the world of work: Trade union initiatives, strategies and negotiations on implementing the Convention on Violence and Harassment (No. 190) and Recommendation (No. 206),” Geneva: International Labour Office, 2024, ILO ACTRAV, for a comprehensive collection of trade union initiatives and strategies to prevent, address and eliminate violence and harassment in the world of work

<sup>2</sup> The ITUC’s 4th World Women’s Conference and the 5th ITUC World Congress recognized the vital role of affiliates in working towards a world of work that is free from violence and harassment and reinforced in the ITUC’s New Social Contract based on gender-transformative and inclusive policies

In 2024, the ITUC conducted its third survey on trade union actions for the ratification and implementation of ILO C190, receiving 114 responses from union confederations in 80 countries (17 from Africa, 19 from the Americas, 24 from the Asia-Pacific region, and 20 from Europe). This survey builds upon the results of the previous two surveys conducted in 2022 and 2023, showcasing the significant and ongoing progress by unions in advocating for C190's ratification and implementation. Notably,

women union members continue to lead the struggle for gender-equal and violence-free workplaces.

However, these positive developments have taken place alongside an increase in violations of workers' fundamental rights in many countries, including violations of collective bargaining rights,<sup>3</sup> even though these rights are crucial to eliminate violence and harassment in the world of work.

### Survey results in summary



OF UNION RESPONDENTS **ARE CURRENTLY WORKING TO SECURE THE RATIFICATION** AND/OR IMPLEMENTATION OF C190.



UNIONS IN **18 COUNTRIES** REPORT THAT THEIR GOVERNMENTS **HAVE ALREADY RATIFIED C190**, AND THAT CAMPAIGN AND ADVOCACY EFFORTS ARE NOW FOCUSED ON STRATEGIES TO ENSURE ITS EFFECTIVE IMPLEMENTATION.<sup>4</sup>



UNIONS IN **25 COUNTRIES EXPECT RATIFICATION IN 2024 OR 2025**. IN THESE COUNTRIES, EFFORTS HAVE CONCENTRATED ON USING C190 IN NEGOTIATIONS WITH EMPLOYERS, WHILE ALSO CONTINUED PUSH FOR RATIFICATION. UNIONS IN COUNTRIES UNCERTAIN ABOUT RATIFICATION TIMING HAVE ALSO ADOPTED THESE STRATEGIES.



OF UNIONS **WERE ACTIVELY ENGAGED IN SOCIAL DIALOGUE** TO ALIGN NATIONAL LAWS WITH C190.



UNIONS **PARTICIPATE IN VARIOUS ACTIVITIES TO IMPLEMENT C190 AND RECOMMENDATION 206 (R206)**, INCLUDING TRAINING, AWARENESS RAISING, AND NEGOTIATIONS WITH EMPLOYERS. MOST UNIONS (84%) ARE ENGAGED IN AWARENESS RAISING AND TRAINING FOR UNION MEMBERS, WHILE 75% ARE FOCUSED ON LOBBYING AND DISCUSSIONS WITH GOVERNMENTS AIMED AT THE RATIFICATION OF C190 AND THE ALIGNMENT OF NATIONAL LAWS.

<sup>3</sup> [https://www.ituc-csi.org/IMG/pdf/2023\\_ituc\\_global\\_rights\\_index\\_en-v2.pdf](https://www.ituc-csi.org/IMG/pdf/2023_ituc_global_rights_index_en-v2.pdf)

<sup>4</sup> Argentina, Australia, Belgium, Canada, Fiji, Finland, France, Germany, Italy, Mexico, Norway, Panama, Peru, Philippines, Samoa, San Marino, South Africa, Spain

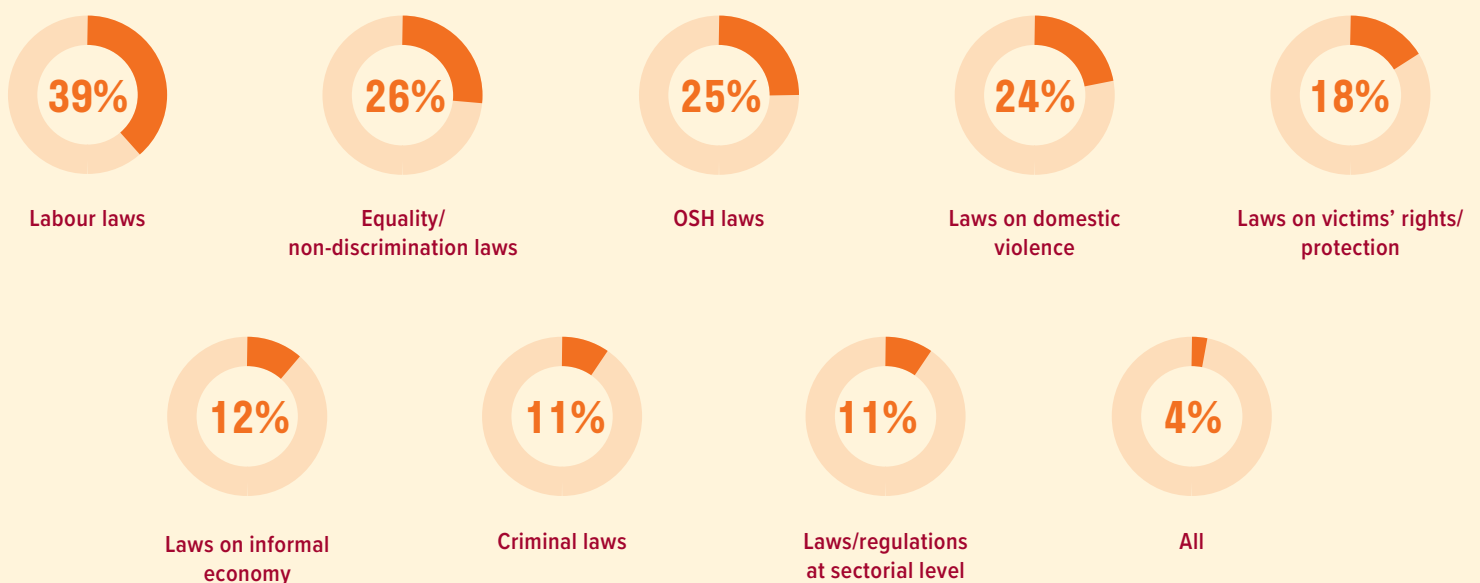
## ALIGNING NATIONAL LAWS WITH C190

Progress has been made on legal reforms in countries that have ratified or are preparing to ratify C190. Aligning national laws with C190 is crucial for many unions to establish employer duties to prevent and address violence and harassment and to ensure trade union participation.

As shown in Chart 1, the largest proportion of unions responding to the survey (39%) reported progress in aligning labour laws with C190 and 26% of unions reported changes in equality and non-discrimination laws to reflect C190 provisions. These results also highlight union advocacy for an intersectional approach that addresses multiple and intersecting forms of discrimination.

An **intersectional perspective** is crucial, as it means that recognition is given to multiple and intersecting forms of discrimination faced by women, racialised workers, disabled workers and LGBTQI+ workers, who are disproportionately affected by violence and harassment. In a survey carried out in 2024 by UNISON in the UK,<sup>5</sup> 78% of women workers, 71% of Black, Asian and ethnic minority workers (BAME), 80% of people living with a disability, and 79% of LGBT+ workers reported experiencing violence and harassment in the last two years. Similarly, the Canadian Labour Congress' (CLC) 2022 survey in Canada found higher rates of sexual harassment for women, trans, nonbinary, gender-diverse, Indigenous and disabled workers.

Chart 1: Legislative changes to align with C190



<sup>5</sup> UNISON (forthcoming) Tackling Violence in Public Services: An Occupational Safety and Health Approach

<sup>6</sup> Berlingieri, A., Welsh, S., MacQuarrie, B., McFadyen, N.D., Bigras-Dutrisac, H. with the Canadian Labour Congress. (2022). Harassment and violence in Canadian workplaces: It's [not] part of the job. London, ON: Centre for Research and Education on Violence Against Women and Children, Western University <https://documents.clctc.ca/human-rights/Respect-at-Work-Report-2022-03-28-EN.pdf>

In **Australia**, ratification of C190 prompted amendments to the Fair Work Act and the Sex Discrimination Act. The Fair Work Act now includes a prohibition on sexual harassment and enhanced protections against discrimination and domestic violence in the workplace. A new ‘positive duty’ introduced under the Sex Discrimination Act 1984 obliges employers to take proactive measures to prevent unlawful conduct, sexual harassment and sex-based harassment in the workplace and connected to work, a hostile working environment and acts of victimisation.

Notably, 25% of unions responding to the survey reported changes concerning occupational safety and health (OSH) laws, ensuring that provisions for the prevention of violence and harassment are now included in OSH risk assessment procedures. These measures, which involve identifying, assessing, controlling and reviewing violence and harassment – including a gender-responsive approach and the inclusion of psychosocial hazards and risks – as OSH risks, have gained importance since the adoption of C190.

A growing number of trade unions focusing on OSH laws and workplace policies to implement C190 are also leveraging the inclusion of “a safe and healthy working environment” within the ILO Declaration on Fundamental Principles and Rights at Work. This recognition followed the designation of the Occupational Safety and Health Convention, 1981 (No. 155) and

the Promotional Framework for Occupational Safety and Health Convention, 2006 (No. 187) as fundamental Conventions at the International Labour Conference (ILC) in 2022.

Similarly, 24% of unions reported the introduction of laws recognising domestic violence as a workplace issue, ensuring that its effects in the workplace are taken into account.

Only 4% of unions reported that all relevant laws listed in Chart 1 have been amended in line with C190, while 12% stated that the laws in their countries are already aligned with C190. However, as many as 27% of unions indicated that their governments are not considering legislative reforms to comply with C190. While progress is evident in some countries, the survey suggests there is still a long way to fully integrate C190 into national laws.

## DOMESTIC VIOLENCE

The Georgian Trade Union Confederation (GTUC), conducted a study titled *The Impact of Domestic Violence in the Workplace* with support from the Solidarity Centre, the US-based international workers’ rights organisation allied with the American Federation of Labor and Congress of Industrial Organizations (AFL-CIO). The study provides a detailed overview of provisions in C190 addressing domestic violence as a workplace issue and offers examples of laws and collective agreements from other countries to promote legal changes and collective bargaining that supports victims of domestic violence in a work context.

In Italy, provisions for leave and support for survivors of domestic violence are included in many national and sectoral collective bargaining agreements, covering sectors such as, public administration, metalworking, tertiary services, food production and construction. These agreements have successfully increased paid leave from 3 months (as provided in the law) to a maximum of six months and also guarantee the right to a job transfer to other company offices or workplaces.

## RISK ASSESSMENT IN PREVENTING VIOLENCE AND HARASSMENT

In Canada, recent amendments to OSH laws require employers to prevent violence and harassment, including gender-based violence and harassment (GBVH) and domestic violence, and to carry out risk assessments. In 2024, the Canadian Labour Congress (CLC) participated in a government-funded initiative with Western University in Ontario to develop new risk assessment tools and provide training for employers and unions to carry out risk assessments and develop prevention plans.

In the Netherlands, violence and harassment are included as risks in the mandatory risk assessment and evaluation (RI&E), which employers must conduct in consultation with unions. This assessment aims at identifying risks faced by workers, prioritising the most severe or significant risks, and setting out measures to prevent harm in a plan of action.

## UNION ACTIVITIES

Unions are engaged in a wide range of activities to implement C190 and R206, ranging from training and awareness raising to negotiations with employers, as illustrated in Chart 2. The vast majority of unions (84%) are engaged in awareness raising and providing training for union members, while 75% have focused on lobbying and discussions with governments, legislature, and parliaments to secure the ratification of C190 and the alignment of national laws. These activities are often conducted in partnership with other unions, NGOs, and stakeholders, thereby strengthening lobbying efforts.

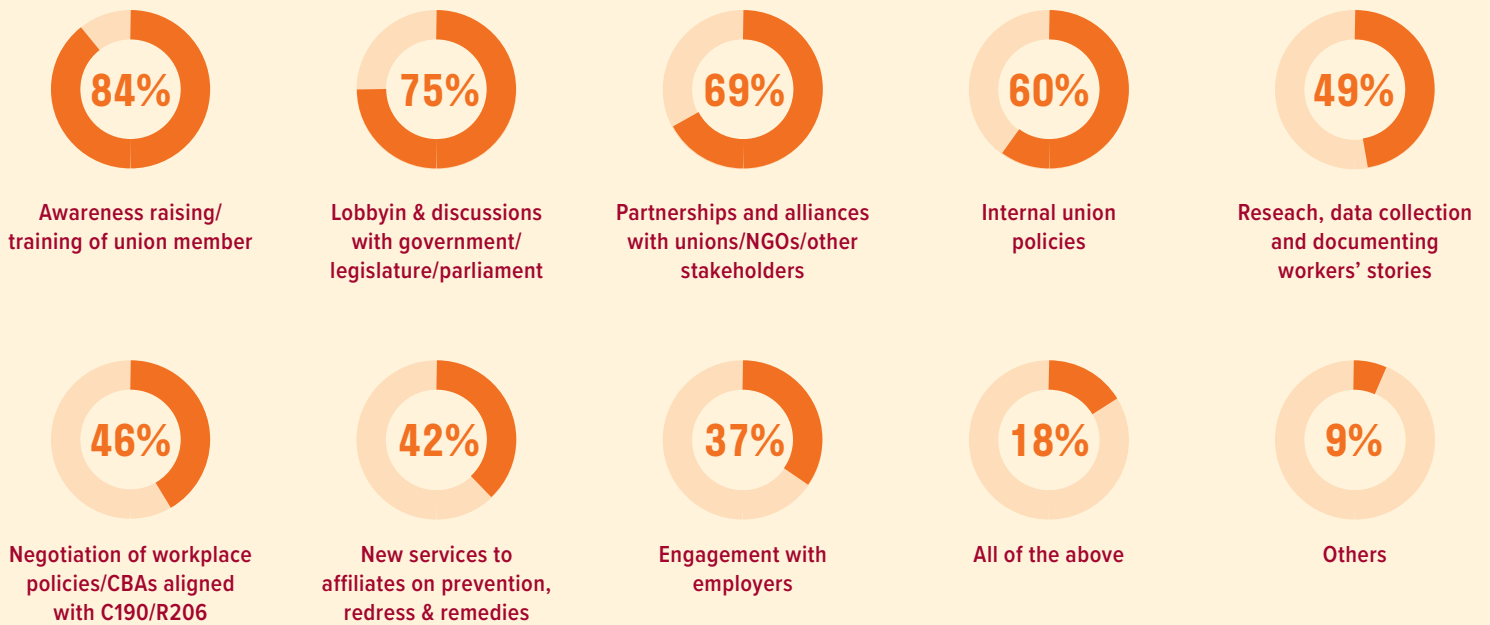
Another significant development is that more unions are adopting internal policies and awareness-raising initiatives to ensure they are equipped as organisations to prevent violence

and harassment affecting their staff, union representatives and affiliates. As in previous surveys, unions continue to emphasise the importance of collecting data and documenting workers' experiences – not only to amplify the voices of those disproportionately affected by violence and harassment, but also to provide an evidence base for lobbying and advocacy.

Forty-two per cent of unions are involved in delivering new services to affiliates on prevention, redress and remedies. Nearly half of all unions (46%) are engaged in negotiating workplace policies and collective bargaining agreements (CBAs), and over one-third (37%) are engaged in discussions with employers. The chart below illustrates the range of union activities in the area and demonstrates the fact that unions are engaged in multiple activities. Eighteen per cent of unions were involved in all the activities listed in the chart.



Chart 2: Activities carried out by unions in the last year



The ASI Venezuela federation has engaged in extensive lobbying, campaigning and training of union members for the ratification of C190. Although the Convention was submitted to the National Assembly on 18 March 2020, no progress has been made since then. In addition to ongoing campaigning and advocacy for ratification, C190 is integrated in all of the union’s activities, serving as a framework for negotiating clauses on violence and harassment and guiding the advocacy efforts of the women’s, youth and LGBTQI+ secretariats.

### AWARENESS RAISING AND TRAINING OF UNION MEMBERS

Union-led training and awareness raising for members and affiliates have been essential in highlighting GBVH, providing tools for collective bargaining, carrying out risk assessments, and negotiating workplace policies that workers can trust. A key component of union training has been ensuring a gender-responsive approach and the inclusion of workers disproportionately affected by violence and harassment.

### THE ROLE OF TRAINING: UNIONS STAND UP TO VIOLENCE AND HARASSMENT

In 2024, training for shop stewards from the Uganda Printers, Paper, Polyfibre and Allied Workers Union, Uganda Textile, Garment, Leather and Allied Workers Union and Uganda Hotels, Food, Tourism, Supermarket and Allied Workers Union achieved impressive results by equipping shop stewards to address sexual harassment effectively.<sup>7</sup> The training provided tools to help unions negotiate for the implementation of C190, which was ratified by Uganda in 2023. It covered reporting mechanisms, comprehensive workplace policies and CBAs to end GBVH, and risk assessment to prevent GBVH. Unions subsequently engaged with factory owners to implement these policies.

<sup>7</sup> <https://www.industriall-union.org/workers-confront-sexual-exploitation-at-ugandan-cardboard-manufacturing-factory>

In one notable case, a shop steward confronted harassment at her workplace (a factory) and initiated investigations that exposed cases of sexual abuse of young women workers, especially those employed on short-term contracts and promised permanent jobs. She stated that the training empowered her to stand up against sexual harassment at her workplace.

### UNION TRAINING ON PREVENTING GBVH AS PART OF HUMAN RIGHTS DUE DILIGENCE

As part of an initiative to prevent GBVH as part of human rights due diligence (HRDD) in the battery supply chain, unions affiliated to IndustriALL in the nickel mining sector in Indonesia participated in training in September 2023 to strengthen their capacity to negotiate policies and agreements to address and prevent GBVH. A specific focus was on ensuring GBVH is included in occupational safety and health, especially in risk assessment procedures. In 2024, a zero-tolerance policy on violence and harassment was included in the first CBA negotiated for workers covering seven companies in the Morowali Industrial Park (IMIP). This policy stipulates that employers must maintain zero tolerance for sexual harassment and violence in the workplace, establishing that sexual harassment is grounds for dismissal.

### COALITIONS AND ALLIANCES

One of the success stories of the campaign for the ratification and implementation of C190 and R206 has been the formation of coalitions and alliances, which bring unions together for a common cause, often in alliance with NGOs. A notable example is the creation of the National Inter-Union Roundtable for the Ratification of C190 and R206 (MNIRC-190) (Mesa Intersindical por la ratificación del C190) in **Nicaragua**, formed by nine trade union organisations to push for the government's ratification and implementation of C190.

MNIRC-190 has also conducted studies to promote a common legal framework, developed guidelines for implementing C190, and launched a national training programme for trade union leaders. In 2024, the coalition published a study titled *Comparative analysis study of Nicaraguan legislation in relation to C190*, which highlights existing provisions in Nicaragua's legislation that align with C190. The study aims to establish the basis for arguments

in bipartite or tripartite dialogues and negotiations to prevent, remedy and eradicate violence and harassment, and to promote the right to equality, non-discrimination and a world of work free of violence and harassment for both men and women.

In 2024, two years of lobbying by Australian Council of Trade Unions (ACTU) and its partners in the Power to Prevent coalition led the government to introduce legislation that will make it easier for victims-survivors of sexual harassment and discrimination to pursue legal action against perpetrators by removing one of the main deterrents victim-survivors face – the significant costs associated with bringing cases to court.<sup>8</sup> Currently, only 1 in 230,000 sexual harassment victims are able to take their cases to court. Victim-survivors of workplace sexual harassment now have a fair chance to seek justice without the fear of financial ruin holding them back. The new cost model is expected to primarily benefit low-income and vulnerable workers who experience sexual harassment and discrimination.

<sup>8</sup> Historic win: harassment victim-survivors granted fairer access to justice - Australian Council of Trade Unions ([actu.org.au](https://actu.org.au))

## A FOCUS ON THIRD-PARTY VIOLENCE AND HARASSMENT

Many unions are developing new tools to prevent and address third-party violence and harassment (TPVH) and ensure its inclusion in national laws, workplace policies, and OSH risk assessment procedures.

Unions have identified TPVH as a significant issue in sectors where workers frequently interact with customers, clients, pupils, students and the general public.<sup>9</sup> In 2024, European employers and trade unions from seven sectors – health, education, transport, hospitality, central and regional government, local government and telecoms – began formal negotiations to update the 2010 European guidelines on third-party violence. Recognising the rapidly changing world of work, the negotiations also emphasised the importance of addressing gender-based violence and harassment, cyber harassment and digital sexual abuse. Webinars, research, and a European-level conference in 2023 inform these negotiations.

In a national survey of 22,478 public sector workers conducted by the UK public service union, UNISON in 2024,<sup>10</sup> 87,7% of respondents reported experiencing at least one form of violence and harassment or GBVH at work in the past two years. Third parties were identified as the primary perpetrators of violence and harassment. Years of austerity in health, education and other public services have worsened this issue, leading to reduced staffing levels and lower levels of quality of service.

The survey findings are being used to lobby the government for legal changes to include third party violence and harassment in labour and equality laws in OSH risk assessment procedures. UNISON's campaigns and

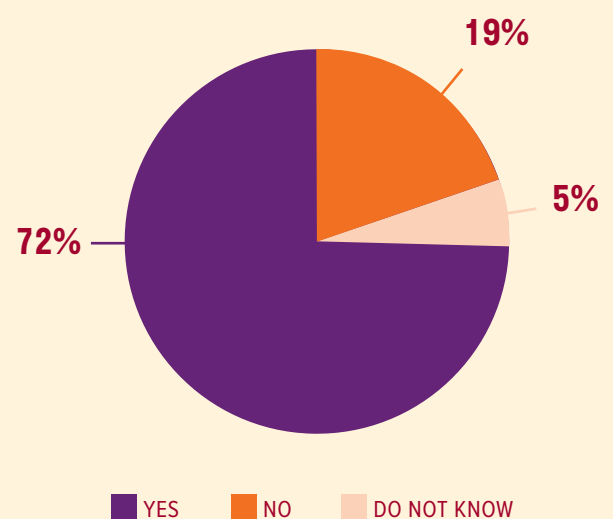
advocacy to end violence and harassment, combined with the ratification of ILO C190 in the UK, have significantly raised the visibility of this issue.

## UNIONS ENGAGED IN SOCIAL DIALOGUE

As illustrated in Chart 3, 72% of unions responding to the survey were engaged in social dialogue specifically to align national laws and policies with C190 and R206. In addition to these social dialogue initiatives on national laws and policies, unions were also involved in social dialogue with public or private employers around workplace cooperation, information sharing, consultation and the negotiation of CBAs.

One key role of unions is to ensure that the ratification of C190 leads to the amendment of CBAs. For example, following the ratification of C190 in the Philippines in 2024, SENTRO began drafting language for clauses to align CBAs with the provisions of C190.

Chart 3: Unions engaged in social dialogue to align national laws and policies with C190/R206



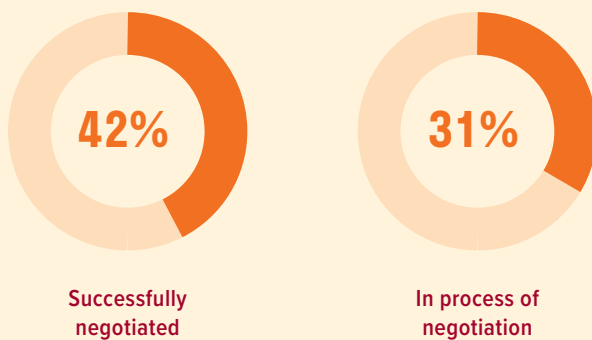
<sup>9</sup> ILO/Pillinger 2024; EPSU et al./Pillinger 2023

<sup>10</sup> UNISON, forthcoming 2024.

## NEGOTIATION OF WORKPLACE POLICIES AND CBAs ALIGNED WITH C190

Trade unions are key to negotiating agreements for their members. As illustrated in Chart 4, 42% of unions responding to the survey have successfully negotiated workplace policies and CBAs addressing violence and harassment, in alignment with C190. In addition, 31% of unions are currently in the process of negotiating workplace policies and CBAs.

Chart 4: Negotiation of policies and CBAs aligned with C190



The following is a selection of recent agreements from Argentina, Israel, Italy, Kazakhstan, Panama, Senegal and Zimbabwe:

- **Argentina:** On 16 May 2024, the General Directorate of Culture and Education of the Province of Buenos Aires, the Ministry of Labor and the Ministry of Education of the Province of Buenos Aires, and the teachers' federation Frente de Unidad Docente Bonaerense (FUDB) signed an agreement in the education sector to prevent, protect, and provide reparation for acts of violence in the workplace, adding new provisions to existing regulations.

- **Israel:** The Histadrut-General Federation of Labour reports that many collective agreements now include clauses on preventing sexual harassment and sanctions against harassers, in line with the principles of C190. An example is the CBA of the Open University in Tel Aviv, signed on 5 March 2024, which prohibits sexual harassment and sexual violence, with sanctions against perpetrators, including dismissal.
- **Italy:** In the transport sector in 2023, ASPI<sup>11</sup> and transport unions signed a protocol and code of conduct to address and prevent workplace violence, promoting a culture of respect and zero tolerance towards any offensive, harmful, or unwanted behaviour. The agreement focuses on preventing gender violence and supporting women victims, including provisions for paid leave and psychological support. Violence and harassment is incorporated into occupational health and safety risk assessment.
- **Kazakhstan:** The Federation of Trade Unions of the Republic of Kazakhstan is promoting a zero-tolerance policy aligned with C190 covering all workers among its affiliates. The policy sets out clear obligations for affiliates to prevent and respond to workplace violence, ensuring a safe and discrimination free environment. Affiliates are asked to include zero tolerance for violence in agreements, incorporating annual monitoring, risk assessments, prevention and educational programmes, complaints mechanisms, and support for victims.
- **Panama:** Landmark agreements have been signed with companies, hotels, the public sector, agriculture, and universities.

<sup>11</sup> The Autostrade per l'Italia group includes four other motorway concession companies and eight companies that provide ancillary services to the core motorway business.

These agreements include measures such as establishing Gender Committees, introducing clauses to address complaints and protect victims of harassment, and recognising the vital role of women workers in these sectors.

- **Senegal:** Trade unions are currently negotiating revisions to the Labour Code, in alignment with C190. The National Women's Committee of the CNTS Confederation continues to actively advocate for the ratification of C190. Additionally, a cross-government Ministerial Council on Policies for the Promotion and Support of Women has been established to reinforce the government's commitment to strengthening gender equality and ending all forms of violence and harassment against women.
- **Zimbabwe:** Recent CBAs, codes of conduct, and policies in various sectors have incorporated clauses on violence and harassment aligned with C190. Examples include the CBA for the textile manufacturing industry, which prohibits violence and harassment, a Code of Conduct in the transport sector, and a sexual harassment policy developed by the Public Service Commission, all designed to create a safe working environment.

## ACTION BY GLOBAL UNIONS

Several recently agreed or updated Global Framework Agreements (GFAs), joint commitments and memoranda of understanding negotiated between global unions and multinational enterprises (MNEs) reference C190, with clauses on preventing violence and

harassment and GBVH. For example, there is stronger language on the prevention of GBVH and an explicit reference to C190 in the updated **GFA between H&M and IndustriALL**, agreed in 2024.<sup>12</sup> In addition, IndustriALL signed legally binding agreements with global brands in Cambodia's garment and textile sector in 2024, which resulted in brand-supported CBAs.<sup>13</sup>

Under the framework of the **IUF and RIU hotel group agreement to end sexual harassment**,<sup>14</sup> a joint initiative between IUF and RIU includes training to prevent sexual harassment. At their annual meetings, RIU and the IUF continue to evaluate the progress of their actions and the introduction of policies and effective procedures to end sexual harassment in all RIU hotels.

In November 2023, **UNI EUROPA and the social partners in telecommunications, finance and gaming** signed European-level cross-sectoral guidelines to eliminate all forms of violence and harassment.<sup>15</sup> The guidelines cover domestic violence, third-party violence, and psychosocial risks of telework, and are aligned with C190 and the Council of Europe Convention on Preventing and Combating Violence against Women and Domestic Violence (the Istanbul Convention).

In addition to these agreements, global unions have adopted several initiatives. The **ITF Women's Advocate Programme** has recently trained affiliates in Latin America transport sector to respond to violence against women in the workplace and at home.<sup>16</sup> **Global unions and the ITUC** have also collaborated to produce training resources aimed at helping unions combat violence and harassment against LGBTIQ+ workers.<sup>17</sup> These resources focus on understanding the disproportionate impact of

<sup>12</sup> <https://www.industriall-union.org/industrial-global-union-if-metall-and-hm-group-update-global-framework-agreement>

<sup>13</sup> <https://www.industriall-union.org/industrial-and-global-brands-sign-legally-binding-agreements-supporting-collective-bargaining-and>

<sup>14</sup> [https://www.iuf.org/wp-content/uploads/2021/12/IUF\\_RIU-Agreement-to-eradicate-sexual-harassment-at-workplace-e.pdf](https://www.iuf.org/wp-content/uploads/2021/12/IUF_RIU-Agreement-to-eradicate-sexual-harassment-at-workplace-e.pdf)

<sup>15</sup> [https://uniglobalunion.org/wp-content/uploads/EU-Cross-Sectoral-Guidelines-on-Violence-and-harassment-at-work\\_Official.pdf](https://uniglobalunion.org/wp-content/uploads/EU-Cross-Sectoral-Guidelines-on-Violence-and-harassment-at-work_Official.pdf)

<sup>16</sup> <https://www.itfglobal.org/en/news/itf-continues-challenge-violence-against-women-in-latin-america>

<sup>17</sup> <https://www.ituc-csi.org/taking-action-on-violence-and-28078>

violence and harassment on vulnerable groups, including LGBTQI+ workers, building awareness of C190's relevance to LGBTQI+ workers, and encouraging unions to integrate C190 into their bargaining processes.

With rising backlash and increasing reports of violence and discrimination against LGBTQI+ workers, the **Council of Global Unions LGBTI Coordinating Committee** organised an online event during PRIDE 2024, *Forward despite the backlash: LGBTI rights and the freedom of association*. The event featured speakers from the UN, ITF, IJF and unions from Zimbabwe, the Philippines and the USA.

In November 2023, IndustriALL Global Union adopted a ground-breaking internal Global Policy on GBVH, Misogyny, and Sexism. The policy sets out a detailed process for handling complaints, along with guidelines for affiliates on establishing internal policies, negotiating CBAs and implementing prevention

programmes to end GBVH, misogyny, and sexism. In parallel, IndustriALL launched the global #NoExcuses campaign in March 2024.<sup>19</sup> All IndustriALL head office leadership and staff completed a two-day training session on implementing the policy and additional detailed guidance is being developed for IndustriALL's staff and leadership involved in complaint handling.



<sup>18</sup> <https://www.iuf.org/news/council-of-global-unions-un-expert-links-lgbti-rights-with-the-freedom-of-association/>

<sup>19</sup> <https://www.industriall-union.org/noexcuse>

**ITUC**  
**International Trade Union Confederation**

[info@ituc-csi.org](mailto:info@ituc-csi.org)

[www.ituc-csi.org](http://www.ituc-csi.org)

Phone: +32 (0)2 224 0211

Boulevard du Jardin Botanique, 20  
1000 Brussels, Belgium

**Publisher responsible in law:**  
Luc Triangle, General Secretary

