RIGHTS AT WORK!

A project by:

Implemented with La Strada and the Association for Legal Intervention (SIP) in Poland, Animus Association in Bulgaria and AIDRom Romania with financial support from the Dutch Ministry of Foreign Affairs.

Report of the Final Conference:
Rights at Work
Tackling labour exploitation in Poland, Bulgaria, Romania and the Netherlands

Friday, 28 September 2018
10.00 – 17.00
De Burcht, Henri Polaklaan 9, 1018 CP Amsterdam, The Netherlands

1. Introduction

Presentation of main findings project and topics of discussion
Suzanne Hoff, International Coordinator, La Strada International

The concluding conference of Rights at Work, Tackling Labour Exploitation in all Economic Sectors, an international project on labour rights infringements and exploitation in Poland, Bulgaria and Romania was held in the building of De Burcht, the oldest Trade Union building in the Netherlands. It was attended by around eighty participants from all relevant stakeholder-groups; trade unions, NGOs, embassies, labour inspections and academic researchers from Poland, Bulgaria, Romania, the Netherlands and Belgium. The conference started with the presentation of preliminary findings and conclusions of the project, followed by three panel debates, each concluded by a short Q&A and discussion with participants. The conference was organised by the Dutch project partners La Strada International, Fairwork and SOMO, in close cooperation with La Strada and the Association for Legal Intervention (SIP) in Poland, Animus Association in Bulgaria and AIDRom Romania and was organised with financial support from the Dutch Ministry of Foreign Affairs (Human Rights Fund).

Suzanne Hoff, International Coordinator of La Strada International, gave an overview of the background of the project and its main findings and remaining questions, which were debated by the different panels. The project started in September 2016 and included nine seminars and six trainings, targeting national stakeholders in the different countries. Research conducted for the project unearthed a lot of valuable information, which will be published in a full report by the end of the year. This conference aimed at sharing the most important bottlenecks in tackling labour exploitation in the target countries and debate possible solutions.

The project identified eight important bottlenecks in the fight against exploitation of (migrant) workers, namely:

1. Lacking awareness from authorities and the public, mainly in Romania and Bulgaria

2. Not addressing the specific vulnerability of migrant workers
3. Difficulties with interpretation and implementation of legislation
4. Need for structural and systematic cooperation of all relevant stakeholders
5. Capacity and mandate limits preventing trade unions to sufficiently support migrant workers
6. Insufficient labour inspection capacity and absence of a 'firewall' (labour rights versus migration control)
7. Low identification of cases of exploitation
8. Gaps in prosecution of perpetrators

In addition it was mentioned that complex and long supply chains, often made deliberately complex through outsourcing and subcontracting to avoid legal liability, has made it difficult to hold private actors to account.

2. Panel discussions

Panel 1: Labour exploitation, human trafficking & forced labour – law and practice

Introduction to the panel: Current legal definitions of forced labour and human trafficking overlap. In some European countries forced labour is a separate crime, while in others it is part of the human trafficking legislation. In practice, it is difficult to distinguish between human trafficking and forced labour, as the crimes are not well or uniformly understood. The absence of clear definitions in national and international legislation of exploitation has led to inconsistency and gaps in protection. National contexts may also impact on how different forms of exploitation are understood and applied. This panel discussed solutions to these legal problems proposed by academics and practitioners.

Facilitator: Conny Rijken, Tilburg Law School, INTERVICT
Speakers:

- Amy Weatherburn - PhD Candidate at the Vrije Universiteit Brussel and Tilburg University *Understanding labour exploitation: seeking clarification in law and effective implementation in practice*
- Imke van Gardingen, Policy Advisor Labour Migration Dutch trade Union FNV – *A separate approach towards labour exploitation is needed to ensure sufficient attention for the issue*
- Annet Koopsen, Dutch victim Lawyer – *Implications for victims of trafficking and exploitation*
- Antoaneta Vassileva – Project Coordinator Animus Association Bulgaria – *Labour exploitation is not 'just a violation of labour law'; how a narrow definition shapes the understanding of labour exploitation*

The first panel, moderated by **Conny Rijken**, Tilburg Law School, INTERVICT, dealt with bottlenecks to identifying and tackling labour exploitation and human trafficking related to international, European and national legal frameworks and their consequences and prospects for prosecution.

Conny Rijken gave a brief description of the legal problems that still exist, despite 20 years of anti-trafficking work, with regard to a clearly defined and internationally shared concept of exploitation. A clear (international) definition is still lacking, making cooperation and prosecution difficult. If human trafficking cannot be proven then prosecution takes place on civil grounds in the realm of labour law violations. A question currently debated therefore is whether we need separate (criminal) legal provisions for forced labour and labour exploitation, next to the anti-trafficking provisions. This remained one of the main discussion points throughout the day.

Amy Weatherburn then took the floor to give an intensive crash course in the legal vicissitudes in different European jurisdictions. Her PhD makes a comparison between legal definitions of human trafficking and labour exploitation in Belgium, England and Wales. She sketched the historically different forms of labour exploitation in law (slavery, servitude and forced labour) and highlighted the fact that despite important commonalities across countries, different jurisdictions use different definitions, thus criminalising different acts and using different legal tools.
Belgium has criminalised trafficking in human beings, using the definition of the EU Anti-Trafficking Directive and does not have a stand-alone offense for labour exploitation or forced labour. While in England and Wales, the application of law is categorical, and it is possible to choose whether to prosecute a case either as human trafficking, forced labour or slavery.

Imke van Gardingen took us to the practice in the Netherlands and the position of the Dutch trade union FNV. She used the example of a mushroom farmer who was sentenced to prison for exploiting 500 Polish workers, but only after a very difficult investigation. This case and others show how complicated prosecution is and that the labour inspection lacks the means and capacity for large evidence research. Not one of the Polish victims has received compensation so far. She proposes that we need to end the current fragmented approach, believing that labour exploitation would remain marginalised, if only regarded as a form of human trafficking. She posted we could possibly learn from the UK Modern Slavery Act and should explore specific legislation on modern slavery, albeit analyse which articles of the Act would be useful to implement in other jurisdictions. Stakeholders should also work together in the entire international chain of company activities. “We need bold actors, working together and workers who do not hide but organise against exploitation”. Imke also pointed at examples of effective cross-border labour action, such as the case of a ship breaking company in Turkey with a Dutch owner who was successful prosecuted for bad labour conditions.

Annet Koopsen was introduced as the main Dutch legal expert supporting victims of human trafficking in the Netherlands and explained in more detail the legal pros and cons of tackling labour exploitation under labour law, or framing it in the context of human trafficking. She referred to the case of a Chinese man she represented who had suffered terrible working conditions for years, in her eyes amounting to labour exploitation, and could not find sufficient protection at the appeal court. The appeal court did not consider his situation as amounting to trafficking. The case showed the risks for victims to report a crime when a court decides the case falls under labour law instead of criminal law, because they are not offered the same protection (e.g. from deportation or the same rights to compensation). The resulting reluctance by victims to come forward in turn leads to impunity for exploiters. Annet said in principle the Dutch anti-trafficking law is good, but with view to the gap in protection for victims if judges classify the crime as a labour law, it should be considered that victims receive the same level of protection under labour law violations as under the human trafficking criminal act provision in order to guarantee they will be able to push charges and receive compensation.

Antoaneta Vassileva, from Animus Association in Bulgaria made a case for strong definitions in law and highlighted the lack of awareness among the authorities and other stakeholders for labour exploitation in Bulgaria. She referred to the problem with the interpretation of the law, with some stakeholders claiming that labour exploitation cannot be prosecuted if no ‘forced labour’ took place. The amount of prosecuted cases of human trafficking in Bulgaria has increased (from 36 in 2016 to 77 in 2017), but without much consequences for those that violated workers’ rights.
Questions and remarks from the audience instigated a short debate on the benefits of “pushing the standards as high as possible” (rather than aiming to prove criminal intent in all cases). This led to the conclusion that there is a strong need for a common ground in all European countries. It was stated that laws and regulations can also have an important preventive and educational role. Other remarks dealt with the duty of national states to protect labour rights, and the practical perspective of protecting victims in case of denouncing exploitation, and the pros and cons of the very detailed and inclusive Modern Slavery Act of the UK. Rather than adding more layers of complexity to legislation by e.g. introducing hundreds of Articles of the Modern Slavery Act in other countries, a call was made for simplification of legislation to enable prosecution.

Panel 2: Complaint mechanisms, labour inspections, prosecution and liability of employers and the private sector

Introduction to the panel: Prosecution of (trafficking for) labour exploitation lacks behind. Adequate safe reporting, effective labour inspections and complaint mechanisms are crucial to ensure access to justice. Yet they are not established, effective or accessible to vulnerable groups, especially undocumented workers. Due to a lack of reporting and enforcement, it remains difficult to hold employers and the private sector responsible. A number of studies in recent years have recommended how to establish effective complaints mechanisms and allow for redress regarding labour rights violations for all workers, including undocumented workers. This ranges from worker-led monitoring and increased cooperation between NGOs, trade unions and inspectorates, to creating a 'firewall' between labour authorities and immigration authorities, including labour inspections and labour courts.

Facilitator: Katrin McGauran, Researcher SOMO
Speakers:

- Lilana Keith, Advocacy officer PICUM on Labour Rights and Labour Migration - *Safe reporting and the need for adequate complaint mechanisms – see PICUM guidelines*
- Robert Jaworski, Chief specialist at the Legality of Employment Department at the Chief Labour Inspectorate Poland – *The role of the Labour Inspectorate in counteracting and combating the crime of human trafficking.*
- Esther de Haan, Programme Manager / Senior Researcher SOMO - *Experiences with multi-stakeholder and company complaint mechanisms and recommendations for improvement*
- Fabiola Mieres, Honorary Fellow at the Department of Geography, Durham University – *Mapping initiatives (policies, programs and other actions) which explicitly address Trafficking, Forced Labour and/or Slavery (TFLS) in supply chains and making corporations liable*

The **Second panel** focused on complaint mechanisms, labour inspections, prosecution and liability of employers and the private sector.

The facilitator **Katrin McGauran**, Researcher at SOMO stated in the introduction to the panel that there are many complaint mechanisms and most of them are flawed and do not function effectively. The question is how to make them work in practice.

Lilana Keith, Advocacy Officer PICUM on Labour Rights and Labour Migration provided a clear analysis on the basis of PICUM's experiences on what does and what does not work. She gave the example of a undocumented domestic worker who worked 15 hours a day, 7 days a week and was only paid 150 euro a month. She had no day off and no permission to leave the house. Her employer never got her a work permit. In practice she was not able to file a complaint, out of fear to be prosecuted for her irregular status. And she risks to be severely sanctioned, facing arrest, detention and deportation, instead of the employer/trafficker. In order to ensure that workers can safely report and complain, and labour exploitation can be identified, it is very important to separate - in practice and in regulation - labour inspection from inspection on immigration enforcement. She highlighted International Human Rights Law, including several ILO conventions that refer to labour rights, regardless of the legal status of the worker. PICUM promoted effective complaint mechanisms and issued a set of 5 guidelines, of which the first demand is the instalment of an effective **firewall** (between putting forward a complaint to a relevant national body on and any proceedings related to immigration). Several other speakers later also referred to the need for a firewall to ensure access to justice and prosecution.

Robert Jaworski, Chief Specialist at Chief Labour Inspectorate in Poland explained the working practice in Poland, where the labour inspectorate provides a special training to recognise human trafficking, with country specific elements. They have trained around 500 inspectors so far. He also elaborated on the modus operandi regarding prosecuting trafficking for labour exploitation in Poland, which is triggered if 1) they receive a notification from someone, 2) if an inspection finds criminal violations, in which case they

notify the police and 3) if background information indicates that criminal violations are taking place. Mr Jaworski also stressed that a lot of effort is put into non-enforcement activity, such as raising awareness, with employers and workers, for instance, through special campaigns ("I work legally", 2017-2019) which aims to raise awareness about the rules of legal employment. The campaign targets both employers and workers with particular emphasis of Ukrainian citizens seeking employment in Poland. He pointed out that labour inspectors do not have the competences to prosecute the crime of trafficking in human beings for forced labour purposes – their task is to notify a relevant prosecutor's office if they raise a suspicion that this crime has been committed.

Esther de Haan, Programme Manager/ Senior Researcher at SOMO presented findings of research based on interviews with workers regarding complaint mechanisms in the electronics industry in Mexico, India, Thailand and the Philippines. Under the UN Business and Human Rights framework, corporations have an obligation to have some kind of formal complaint mechanism, and in many cases they install a voluntary system of their own. These all have in common that they are not very effective or do not function at all. If they function, this is for relatively small problems compared to severe violations. These can be very important, however, and the result should not be disregarded, especially in situations where there are no other formal institutions to solve these cases. But the overall conclusion was that these voluntary complaint mechanisms cannot be a replacement for institutional legal action, and also not for trade unions and the workers' right to organise.

Fabiola Mieres, from Durham University presented results of her research mapping initiatives addressing Trafficking, Forced Labour or Slavery (TFLS), of which she found 97, including complaint mechanisms. The mapping included an analysis of their impact. The overwhelming majority of initiatives are based on the CSR model which is voluntary and thus problematic as voluntary initiatives, in a number of studies of the past decade, have been found not to be effective in combatting TFLS and are thus not effective at the level of labour exploitation.
Mieres has a clear preference for initiatives based on 'worker driven mechanisms' (where workers are involved from the beginning) and with binding agreements to comply with agreed codes. 'Real effect comes from real sanctions. Where there are strict codes, such as the IFA-initiative, whilst monitoring is often the problem'. She also agreed with the approach suggested by PICUM, such as the firewall.

Katrin McGauran summarised some of the most important points put forward by the panel, such as the firewall, the need for active collaboration of the workers and trade unions, and "the elephant in the room", that is the policy incoherence between labour/anti-trafficking and immigration laws, because restrictive migration policy denies migrant workers basic rights, making them vulnerable to labour exploitation. Tackling labour exploitation means immigration laws need to be revised.

During **questions and remarks from the audience**, Edwin Atema from the Dutch trade union FNV (transport) asked Robert Jaworski how they deal with the fact that many Ukrainian truck drivers are employed by Dutch transport companies, using Polish firms and paying them substandard wages. Mr. Jaworski replied that these are often letterbox constructions that are impossible to act against. A topical debate ensued about the abuse by employers of the Posting of Workers Directive (PWD), which allows for workers to temporarily being employed in one member state under the labour and social security conditions of their home state. This Directive is being abused by employers setting up letterbox companies in EU member states with low wage and social security levels (typically eastern European ones) and letting workers in the construction, transport and meat industry, among others, work under contracts signed with legal entities incorporated in these states. The economic reality, however, is that they effectively work in western European states. This way large parts of the workforce are being exploited in Europe. According to Atema, if there would be enough political will, authorities could act against the practice of those shell companies. The PWD was not discussed by the panels specifically, but is recognised by stakeholders to be problematic together with letterbox companies.

A question from the floor to the panel was why if complaint mechanisms were found to be so flaws, would we advocate for them? Esther de Haan answered that of course it would be better if all companies

complied with the UN Guiding Principles, however, these are voluntary guidelines without mandatory consequences, it is up to companies whether or not to act. The panel agreed that a binding instrument in the form of a treaty, as is currently debated in the UN, is necessary. There is also a credible argument for advocating for company grievance mechanisms in cases where an effective state or other enforcement authority is lacking. In some parts of the world, Fabiola points out, there are regimes without protective laws or enforcement mechanisms. In these cases grievance mechanisms can offer some recourse. Nevertheless, they should not be seen as sufficient replacement for real legal frameworks and active representation of workers. Others join in with recommendations for stricter mechanisms and measures that are more binding for states or the private sector.

Panel 3: Cooperation of stakeholders to address cases of labour exploitation and support victims
Introduction to the panel: Migrant workers are often confronted with precarious working and living conditions, ranging from bad employment to exploitation. Trade unions or alternative workers organisations, migrant rights organisations and NGOs should work together to identify and assist vulnerable and exploited workers. Consistent cooperation between them, however, aiming to address the symptoms and the causes of human trafficking and forced labour, is still lacking. ITUC and Anti-Slavery International found that lack of awareness of strategies and activities or different ways of working were the main obstacles for building broad national coalitions on workers' rights and human trafficking.
This panel looked at the situations in which migrant workers are subjected to exploitation and discussed how different actors in the rights field should work together to identify abuse and provide access to justice.

Facilitator: Eline Willemsen, Project Manager Labour Exploitation FairWork
Speakers:

- Sorin Dandea, trade union CARTEL ALFA Romania – *The role of the Romanian trade union in identifying victims and supporting workers*
- Elena Timofticiuc, National Coordinator AIDRom Romania - *Migrant workers situation in Romania and cooperation with trade union in prevention work*
- Edwin Atema, Dutch trade Union FNV (FNB Transport and Logistics) - *Trade union cooperation to tackle labour exploitation in the transport sector*

After lunch the **third panel** took place on cooperation of stakeholders to address cases of labour exploitation and support victims.

Sorin Dandea talked about the practice of the trade unions, not only in Romania but also in Europe and Brussels. He did not agree with some observations that trade unions are not doing enough, 'they are doing what they can under difficult circumstances, and try to work together as much as possible, with other trade unions in Europa, and with NGOs'. As an example of this collaboration, Mr. Dandea described the fact finding mission, done jointly with the Dutch FNV, on activities from Dutch companies in Romania. With the example of the Dutch shipbuilding company Damen that had bought a Romanian shipyard and wanted to be able to move workers to their operations in Rotterdam, if there would be need for workforce there. In collaboration between the two unions the workers were unionised and it was agreed that they would have dual membership, so to fight against loopholes in the Posting of Workers Directive. Another positive experience mentioned is the 'Fair Mobility' project that started in 2012 and under which the German trade union federation (DGB) opened information centres in the major German cities to assist exploited workers from East Europe. The centres provide practical labour advice to foreign (and local) workers. Mr. Dandea also advocates the simplification of legislation, the use of clear definitions and collaboration with clear agreements with the labour inspectorate.

Elena Timofticiuc from the Romanian NGO AIDRom described the strange situation at the moment in Romania, where on the one hand many people left the country to work in other European countries, while on the other hand - especially since 2015 - many refugees entered the country from amongst others Syria. Although most of them would like to move further west, they often stay first in Romania and enter the labour market there. They face specific problems, including exploitation and discrimination. To raise

awareness, AIDRom started the campaign "Welcome your Neighbour" to raise awareness that Romania is not only a country of origin of victims of trafficking and forced labour, but also a country of destination.

Edwin Atema works for the transport and logistics department. He was a truck driver himself for many years and has seen how bad working conditions and exploitation of workers causes misery. He works with the international transport union in London on cross border supply chain checking and has targeted exploitative employers in the transport sector. He would rather not call his work lobbying but "to nail them down with information". Part of the solution is to organise the exploited workers. He therefore recruited drivers from Romania to help organise Romanian drivers in the Netherlands. Atema calls for working from a broad analysis of the situation wherein exploitation takes place: 'look at the business model, the system of industry and the policy behind it and put the finger at the top of the supply chain'. In this way he has been able to link cases of exploitation to corporations like IKEA and BMW. The main problem he encountered is lack of interest from authorities, next to lack of instruments to intervene. At this moment there is an "explosive increase of employment of non-EU drivers working for companies from western Europe." Mr Atema promised his audience that we would see revealing Europe-wide media-exposure about this in the coming days. The cross-border investigation carried out in collaboration with the investigative journalists network Investigate Europe has since been published and a video documentary made. Different media collected first hand evidence of exploitation in a cross-border investigation on the working conditions and bogus employment contracts Central and Eastern European but increasingly non-EU nationals (Kazakhstan, Philippines) truck drivers face in the transport sector.

Questions and remarks after the three introductions were (partly addressed to the different representatives from labour inspections in the audience) about the daily practice of the labour inspection, and whether they supported the idea of the firewall; a clear separation between immigration control and labour conditions inspections. The Dutch labour inspection claimed that they were not diminishing the work on safety inspection at work, as was claimed from the audience, that their overall budget was being increased and that they were diversifying their approach to tackle cases of forced labour and trafficking. A representative of La Strada Poland stated to be happy to hear that the labour inspectorate in Poland supports the idea of a firewall and sees that it advances their work to fight exploitation and trafficking.

Other debates were about the lack of capacity of trade unions to engage in all sectors and to sufficiently support and unite workers that are exploited, sometimes enhanced by prohibiting laws, For instance in Romania, where it is not possible to start union work in small and medium-sized enterprises. Another point of attention are laws around collective bargaining, which has been made much more difficult for unions in Poland since the conservative government changed the laws in 2010. Others pointed at international regulation such as the Posting of Workers Directive, the revised version of which excludes the transport sector, and the need for higher and fixed minimum salaries in the home countries of drivers. "It is not a case of East against West, but about workers everywhere and their rights".

Sorin Dandea informed participants about the ins and outs of the EU political system for law reform, such as the revision of the PWD, and the yellow card that governments can pull to block that. Sorin is member of the European Economic and Social Committee (EESC), a consultative body comprised of economic and social interest groups whose opinions are addressed to the Council, the European Commission and the European Parliament, thus playing a key role in the EU's decision-making process. Romania blocked the revisions of the PWD with a yellow card, but without consulting the trade union, which was and is in favour of the revision. The Romanian trade unions informed the EU partners that this was not a shared position, allowing for the revision to receive a majority in the Council (EU governments). Elena Timofticiuc told more about the functioning of their multifunctional centre's practice with helping to file complaints, in collaboration with social workers and labour inspection. In a collective case, 40 women won and received extra payment that had illegally been withheld. There have also been cases defending rights of women from Syria and Ukraine, preventing their deportation. She further referred to the specific exploitative situation of undocumented women from (mainly but not only) the Philippines employed for housekeeping work by rich Romanian families. Again, the fear of deportation or other sanctions prevent them from acting against their exploitation.

A specific problem is that employers can close their businesses or go bankrupt and the claimants would lose their source of income, if they press charges. A structural solution for this would be that states guarantee some kind of income in such a case, and minimally guarantee their safety.
Another interesting problem addressed was the bureaucracy within trade unions, where sometimes it is not clear which trade union workers should address to report the infringement of their rights. There is a need for a membership system that would cover the whole region that the supply chain also covers.

In Poland, the influx of migrant workers from mainly Ukraine and former SU countries, but increasingly also from South East Asia has increased strongly as many Polish workers migrated within Europe. Polish trade unions took some time to adapt to that situation but are slowly trying to support workers, action is also taken up by alternative workers organisations and organisations set up by the migrant community themselves. Still migrant workers are very vulnerable and are in need of support.

3. Recommendations on actions to take at national and European level

Suzanne Hoff summarised the day by making a few common observations and gave the participants a last chance to come forward with recommendations for the near future, before closing the conference.

First we had the opportunity to have a presentation of a new campaign that the Romanian government is launching to raise awareness about exploitation and trafficking with the title "Know Your Rights, Respect your Obligations". This campaign is aimed at Romanian citizens, living abroad but also workers within Romania, to prevent trafficking and labour exploitation.

Conclusions and Recommendations:

1. More debate and exchange to discuss gaps and possible solutions related to identify and prosecute human trafficking, forced labour and labour exploitation.
2. Increase awareness among relevant stakeholders and the general public about labour exploitation in Europe, particularly in the three project countries.
3. Further development and revision of existing legislation and ensure a more harmonised interpretation.
4. More outreach work, research and labour inspections to focus on exploitative practices in specific vulnerable sectors.
5. Ensure better protection of migrant workers and train those in contact with migrants and refugee groups to adequately identify victims of trafficking and exploitation.
6. Promotion of multi-disciplinary approach and cooperation, involving and stimulating engagement of trade unions and migrant rights groups.
7. Ensure clearly defined roles and agreements between different stakeholders to address the issue of labour exploitation and adequate training for all relevant stakeholders.
8. Implement more binding corporate accountability measures to hold business and employers liable. This can be enriched with private sector CSR initiatives where it is deemed they might affect a change in corporate practices, but these should not be viewed as a replacement of hard law.
9. Ensure better information provision to workers on their rights and involve workers in initiatives to address labour exploitation and human trafficking (e.g. workers' led monitoring).
10. Inform (future) migrant workers via prevention programmes about risks of exploitation and engage migrant workers to share experience in the country of origin. These campaigns should not have the aim, however, to discourage migration per se.

11. Ensure access to justice and remedies including safe reporting, adequate complaint mechanisms and compensation and back wages for all potential victims of exploitation and other serious labour law infringements, such as violations of collective labour agreements and minimum wage laws.
12. Increase access for workers to the labour market and prevention of discrimination.
13. Enlarge victim protection under labour and/or administrative law, including compensation and safety from sanctions in immigration law (such as deportation).
14. Implement a firewall between the inspection of workplaces for labour law violations (labour inspectorates) and irregular employment relationships (immigration services).
15. Ensure more efforts, to be made by trade unions, to develop systems of dual or international membership and support to migrant workers including undocumented migrant workers.
16. Promote European cooperation among lawyers to support cases of labour exploitation also across European borders (Initiative NHC/CofE to establish a European wide lawyers network).
17. There is a need for European-wide minimum wages and binding global standards.