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# LABOUR INSPECTION AS AN INSTRUMENT TO PROTECT WORKERS IN INFORMAL ECONOMY: CHALLENGES, OPPORTUNITIES AND RESPONSIBILITIES

## Executive summary

Wednesday, 7 June 2017

Workshop

In conjunction with 106<sup>th</sup> Session of the International Labour

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## Background

This NGO workshop was jointly organized by the International Catholic Centre of Geneva (CCIG), Kolping International/the German Commission for Justice and Peace (GCJP), the International Coordination of Young Christians Workers (ICYCW), International Young Christian Workers (IYCW), the World Movement of Christian Workers (WMCW), Caritas Internationalis (CI), and the International Catholic Migration Commission (ICMC), with the collaboration of the Migrant Forum in Asia (MFA). Furthermore, the event was made possible with the support of the World Council of Churches (WCC).

‘Labour Inspection as an Instrument to Protect Workers in Informal Economy: Challenges, Opportunities and Responsibilities’ was designed to raise awareness about best practices of labour inspection and highlight its potential as a mechanism to protect the world’s most vulnerable workers: those working in the informal economy.

Across the globe and within the borders of every country, employment comes in many different forms which vary in their degrees of formality. At one end of the spectrum lies the informal economy, in which workers may be subject to unsafe working conditions and left without protections as a result of their unrecognized working status. Domestic workers, migrant and subcontracted labourers are frequently cited as examples of vulnerable workers who may face the harsh realities of the informal economy. Despite accounting for an integral part of the global value chain, youth, women, and migrants often find themselves in the most precarious situations and are still far from having their fundamental rights guaranteed.

When effectively administered at the national level, labour inspection can help provide protections and improve working conditions for workers in the informal economy. Labour administrations and their inspectors should serve the dual role of counseling employers and workers about international standards on wages, working time, and acceptable working age amongst others, while also uncovering faults in the system to be reported to national authorities.

Since its inception, the ILO has recognized the importance of labour inspection in promoting State compliance with international labour standards. This conviction led to the 1947 Labour Inspection Convention (No. 81) which called upon ratifying States to establish national systems for labour inspection of

industrial and commercial workplaces. Subsequently, the concerned workplaces were extended to include agriculture with the 1969 Labour Inspection Agriculture Convention (No. 129). While important efforts have been made at the international level to promote labour inspection, all too often national labour bureaus are understaffed or underfunded, leaving them unable to fulfill their most basic duties. This coalition of NGOs believes labour inspection is a critical instrument for advancing the rights and protections of workers in the informal economy that should be at the forefront of advocacy efforts on the issue.

Coinciding with the 106th session of the International Labour Conference titled, “Building a future with decent work”, which this year focused on the precarious working situations of migrants labourers, the workshop convened prominent members of civil society, the ILO, and actors in the field, to create a space for dialogue among concerned stakeholders and advocates.

Participants had the opportunity to hear testimonies from NGOs working in the field and experts at the international level, as well as the chance to contribute their own experience to the discussion.

Panelists, **Ms. Prossy Nambatya** (Joint Action Committee on Decent Work in Uganda), **Mr. Berhanu Sinamo** (ICYCW), and **Ms. Apinya Tajit** (Caritas Thailand) offered testimonies of the challenges of labour inspection based on their experience working in NGOs in Africa, Latin America, and Southeast Asia, respectively. Later in the morning, **Mr. Markus Demele** (GCJP), delivered a presentation on a recent publication by trade unions and Catholic organizations in Germany: “Labour inspection in a globalised world”. Following the presentation, panelists, **Mr. Arsenio Fernandez Rodriguez** (ILO), **Ms. Martine Combemale** (Human Resources without Borders), **Ms. Nicola Piper** (Sydney Asia Pacific Migration Centre) and **Mr. Markus Demele** himself, took part in a panel reflection on the position paper, eventually opening up the discussion to members of the audience.

This brief report provides a summary of the discussions that took place during the workshop and aims to keep all interested organizations, NGOs and individuals up to date on the organizers’ activities, working areas and achievements.

## AGENDA

### 9:30 – Welcome and Opening Remarks

**Prof. Dr. Isabel Apawo Phiri**, Deputy General Secretary for Public Witness and Diakonia, World Council of Churches

**Ms. Maria D’Onofrio**, Secretary General, International Catholic Center of Geneva

### 9:45 – Introduction: *Challenges in protecting the rights of migrant workers*

**Ms. Jasmine Lidasan**, Migrant Forum in Asia

### 10:15 – Testimonies from:

Africa - **Ms. Prossy Nambatya**, Joint Action Committee on Decent Work in Uganda

Latin America - **Mr. Berhanu Sinamo**, Int. Coordination of Young Christian Workers

South East Asia - **Ms. Apinya Tajit**, Caritas Thailand

Moderation: **Ms. Sarah Prenger**, International Young Christian Workers

### 11:00 – Questions and Discussion

### 11:15 – Coffee Break

### 11:30 – Presentation of “Labour inspection in a globalised world”

*Position paper from the German Confederation of Trade Unions (DGB) and the German Commission for Peace and Justice (GCJP)*

**Mr. Markus Demele**, Kolping International

### 11:45 – Panel Discussion followed by Plenary Debate

**Mr. Arsenio Fernandez Rodriguez**, Technical Specialist, ILO

**Ms. Martine Combemale**, Human Resources without Borders

**Ms. Nicola Piper**, Sydney Asia Pacific Migration Centre

**Mr. Markus Demele**, Kolping International

Moderation: **Ms. Hildegard Hagemann**, Kolping International/GCJP

### 13h15 – Concluding Remarks

**Ms. Marilea Damasio**, General Secretary, World Movement of Christian Workers



## EXECUTIVE SUMMARY

The morning workshop began with a warm welcome from **Prof. Dr. Isabel Apawo Phiri** (Deputy General Secretary for Public Witness and Diakonia, World Council of Churches, WCC). She affirmed the WCC's belief in the importance of promoting Decent Work, explaining that the council has long criticized economic policies that encourage greed in the financial sector at the expense of the people and the earth. Ms. Phiri spoke of the power of labour inspection to make visible what would otherwise be invisible, making reference to Book II of Genesis and the life-affirming role that work should have.



**Ms. Maria D'Onofrio** (CCIG Secretary General) followed by offering her own opening remarks. She explained how the International Catholic Center of Geneva, together with its members and partners, has convened consultations linked to the activities of the ILO over the past 7 years in order to help promote Decent Work for various vulnerable groups. She also emphasized the importance of the topic chosen for the 2017 Workshop by reaffirming that the role that labour inspection plays in promoting Decent Work and protecting workers' safety is often overlooked.



**Ms. Jasmine Lidasan** (Representative of MFA) was next to take the floor, delivering an introduction focused on the particular challenges of protecting the rights of migrant workers in the Asian context. She began with a definition of a migrant worker as a person who has been, is, or will be engaged in a remunerated activity in a State of which he or she is not a national. From this basis, she delineated the various struggles of these workers and their often precarious employment arrangements. She cited several egregious practices of employers such as withholding migrant workers' passports and wages, changing

the initial terms of contracts upon migrants' arrival, denying the worker personal days and even taking out loans in the names of a worker, leaving them with unconsented, crippling debt. According to Ms. Lidasan, employers and recruiters are not the only actors at fault, but the media also plays a significant role in projecting a negative image of migrant workers, pushing them further into the shadows of society and weakening public motivation for advocacy on their part. Moreover, for many migrant workers, advocating for their rights is accompanied by risks, including the threat of apprehension or deportation. In some countries, advocating may even be forbidden by local law. In other cases, migrant workers may be intimidated by authorities not to speak out. Ms. Lidasan acknowledged that this seemingly hopeless position may negatively impact the mental health of migrant workers over the long term. Ms. Lidasan asserted that labour inspection is absolutely integral in ensuring basic rights for migrants workers and in pursuing sustainable development. She also called for the inclusion of more women in labour inspection administration to instill practices more sensitive to issues linked to gender.

“MIGRATION IS AN EXPRESSION OF THE HUMAN ASPIRATION FOR DIGNITY, SAFETY AND A BETTER FUTURE. IT IS PART OF THE SOCIAL FABRIC, PART OF OUR VERY MAKE-UP AS A HUMAN FAMILY. (...) IT IS OUR COLLECTIVE RESPONSIBILITY TO MAKE MIGRATION WORK FOR THE BENEFIT OF MIGRANTS AND COUNTRIES ALIKE. WE OWE THIS TO THE MILLIONS OF MIGRANTS WHO, THROUGH THEIR COURAGE, VITALITY AND DREAMS, HELP MAKE OUR SOCIETIES MORE PROSPEROUS, RESILIENT AND DIVERSE. LET US INTENSIFY OUR WORK AND BE SURE TO FOLLOW-UP.”

(Ban-Ki Moon, UN Secretary-General's remarks to High-Level Dialogue on International Migration and Development – 3 October 2013)

## Testimonials from the field

The discussion then shifted to the panel, which was moderated by **Ms. Sarah Prenger** (ICYW). The first testimonial from the field came from Uganda, with the input of **Ms. Prossy Nambatya** (Joint Action Committee on Decent Work in Uganda, Uganda Episcopal Conference). Ms. Nambatya began with an overview of the factors that contribute to the current state of the work force in Uganda, and her organization's efforts collaborating with the trade unions and Uganda's Ministry of Gender, Labour and Social Development, which is responsible for labour inspection. In Uganda, the unemployment rate is as high as 64% of the workforce. Ms. Nambatya explained that this high level of unemployment has driven Ugandans to migrate from rural to urban areas, at times crossing borders to seek employment. With this mass migration to urban areas, many of the jobs that migrants find take place in households, yet homes are not considered formal workplaces and are not easily accessible to labour inspectors. Moreover, Ms. Nambatya cited that it is mostly women who engage in domestic work with little to no protections. She described the deficiency of labour inspection in Uganda, as the product of a variety of negative contributors. First and foremost, the Ministry concerned with labour inspection is severely underfunded and understaffed for effectively conducting inspections. As a result, abusive



**"Labour is an important factor of production, we need to be creating an enabling environment to harness its**

employers take advantage of weak labour inspection practices to further exploit their workers. Further compacting the situation, many workers may not be aware of their rights under national laws, let alone fully literate. Ms. Nambatya called for the translation, localization and dissemination of information on relevant labour laws to local populations as

a means of increasing the capacity of workers to advocate for their own rights. She also insisted that mechanisms be put in place to operationalize existing laws and regulations on migrant labour, which currently cannot be implemented due to insufficient resources and political will.



Next to shed light on a particular region of the world and its labour inspection practices was **Mr. Berhanu Sinamo** (ICYCW International President) with his testimonial from Latin America. Mr. Sinamo focused on young populations in particular, who face unemployment rates of up to 50% in Latin America. He underscored the potential negative effects of youth unemployment on individuals' career trajectories and future income as well as an increased likelihood of engaging in drug abuse and criminal activity. Mr. Sinamo shared the individual stories of two young workers in Paraguay, where the constitution establishes labour rights such as a maximum of 8 hours of work a day and freedom of association. Nevertheless, these workers reported being required to work overtime, with little to no possibility of taking personal days, at times working in hazardous conditions and being prohibited from forming unions. Furthermore, Mr. Sinamo made reference to complaints from workers about the lack of confidentiality in the system of labour inspection, where employers are immediately informed of the contents of inspectors' reports, about the absence of formal contracts, which result in job insecurity and finally, about the reality that even in work arrangements with contracts, employers often disregard prior agreements. He concluded his intervention by advocating for the precision, expansion and reinforcement of laws protecting workers in the informal economy.



Last to offer insight from the field, was **Ms. Apinya Tajit** (Caritas Thailand) with a testimonial from her work in Thailand. Ms. Tajit chose to speak about a particular issue her work tackles: forced labor at sea. She explained that the seafood and fishing industry represent a particular challenge for enforcing labour laws and obtaining access for labour inspection since fishing boats go to sea for months at a time. The victims of this kind of human trafficking, according to Ms. Tajit, are often poor, uneducated and unaware of their working rights, and may fear seeking help from authorities who are often corrupt and may collude with



traffickers. While the legal framework exists for punishing such crimes and offering victims protections, these laws are largely unenforced. Ms. Tajit described her work for an organization, “Stella Maris Seafarers Centres” that provides legal counsel for victims of seafaring trafficking, refers their cases to the Labour Inspectorate Unit of Thailand, and monitors the progress of formal complaints. With this organization as an intermediary between the forced labourer, the trafficker and the authorities, faced with the threat of international pressure, each individual case is more likely to be addressed by the government thus increasing pressure for it to put mechanisms in place to prevent trafficking. Ms. Tajit concluded by asserting that NGOs cannot solve this problem alone and that it is high time States began to enforce existing laws.

## ***“Labour Inspection in a globalized world”***

### **Presentation of the Position Paper**

Following a short break, **Mr. Markus Demele** (Kolping International) offered a summary of the arguments made in the position paper published by the German Confederation of Trade Unions (DGB) and the German Commission for Peace and Justice, giving audience members a context for the discussion that would follow. Mr. Demele identified several recommendations highlighted in the paper, intended both for the European context as well as that of the Global South. These recommendations included the adoption of a law requiring German enterprises that engage in foreign transactions to practice due diligence in regards to human rights, the requirement of proof of time in the workplace in order to more effectively monitor minimum standards, and the establishment of indicators to monitor the implementation of labour inspection. Additionally, he cited the suggestion made in the paper that states adopt guidelines put forth by the Organization for Economic Co-operation and Development (OECD) on establishing a system of national contact points for



labour inspection, in which workers file complaints, which remain on record, about specific companies. He briefly described the system of labour inspection in Germany, which he considers falsely based on a notion of equality between employers and employees and too fragmented. He contrasted this with the more extreme challenges of labour inspection in the Global South, where economically weak countries face even greater difficulty enforcing labour laws, and social dialogue on the subject is often suppressed. He finished by calling for European actors to offer their support to countries in the Global South in the development of transparent labour inspection structures and to promote cooperation with ILO country offices.

## Panel Discussion and Plenary Debate



**Mr. Arsenio Fernandez Rodriguez** (ILO) was the first member of the panel to remark on the publication expressing his support for the central arguments of the paper. He did however, offer several concrete suggestions for making the paper's recommendations even more feasible. Mr. Fernandez Rodriguez considered the suggestion of setting up an international labour court an initiative worth looking into. He

underscored that the enforcement of national labour legislation should remain a public prerogative undertaken by the labour inspection, notwithstanding the need for a closer cooperation with civil society and in particular with social partners. While he stressed that the ILO system of labour inspection (which is comprised of two supervisory systems, one that follows up on reports from States that have ratified ILO conventions and another that handles specific cases) generally works, he agreed with the sentiment expressed in the paper that it is necessary to increase the resources of the ILO in order to enable it to provide more assistance in establishing labour inspection practices in developing countries.

**“The participation of social partners is a prerequisite for labour inspection to carry out its duties.”**

Next to take the floor was **Ms. Martine Combemale** (Human Resources Without Borders) who addressed social auditing and the issue of corruption that accompanies it. Ms. Combemale described the phenomenon of social auditing, which delegates the responsibility of labour inspection to private auditing firms and has developed into a problematic private industry. According to Ms. Combemale, this deeply flawed system can actually create more problems than it solves. In some cases, employers bribe auditors, sometimes paying them more than the workers they actually employ. Ms. Combemale went on to explain that in many situations, auditors only inspect the areas that subcontractors allow them to see, clearly abandoning the necessary element of independence. Furthermore, the efforts companies are in the process of undertaking to improve labour conditions and rights might not be acknowledged or fully understood by the auditing firms, making their reporting futile and at times even counterproductive. Ms. Combemale believes that social auditing has the potential to greatly improve human rights and productivity, but sees an immediate need for a new approach to the system of administering it.



**Ms. Nicola Piper** (Sydney Asia Pacific Migration Centre) was the final panelist to offer her input before opening the discussion for audience participation. Ms. Piper centered her contribution on the specific challenges faced by migrant workers. She spoke of the urgent need to create a firewall between labour inspection and immigration control. Migrant workers could face deportation without the right to claim unpaid wages or other forms of persecution for simply advocating for their labour rights. This threat leads Ms. Piper to call for a strict separation between labour and immigration laws, forbidding labour authorities from reporting workers in the country illegally to immigration services. However, Ms. Piper claimed that in reality, immigration control is often given priority in funding over labour inspection, citing the example of Australia which in 2015, spent 20% more on border control than labour inspection. She concluded by calling upon civil



society and unions to inspire the political will for improving labour inspection practices.

**“We need to create a firewall between labour inspection and immigration control. Migrant workers should be able to have their rights protected without fear of deportation.”**

Following the conclusion of the panel, which was moderated by **Ms. Hildegard Hagemann** (German Commission for Justice and Peace) a Question & Answer session was held in order to provide a venue for contributions from other participants of the event. Among the topics raised by the audience was the role of the media in mobilizing actors around the cause of labor inspection. Panelists discussed the fleeting nature of attention devoted to an issue after initial media



exposure and meditated on ways to prolong public engagement with a cause. Furthermore, a participant in the event expressed the need to give the subject of ‘labour inspection’ more rhetorical appeal, in order to gain more widespread momentum for the promotion of it. Another member of the audience mentioned the possibility of the ILO taking on a tripartite approach to address labour issues, welcoming in religious leaders who often possess major platforms and influence over their followers, to promote decent work. Finally, the important role of social dialogue in the good governance of labour migration was also highlighted.



## Concluding remarks

**Ms. Mariléa Damasio** (WMCW General Secretary) concluded the morning workshop with an impassioned speech which called for continued collaboration amongst all concerned stakeholders to find the correct balance between international, national and regional labour governance, to increase training on and education on labour rights, and to once and for all put an end to human trafficking. Ms. Damasio thanked all who participated in the event before ending her speech on an uplifting note: “We represent different countries. We share a faith--this is what brings us together and brings us to fight together.”



**“We represent different countries. We share a faith--this is what brings us together and what brings us to fight together.”**



## ANNEXES

### 1. List of participants

Participant	Organization
Griselda Almenara	Caritas Internationalis
Yvette Angulo	International Catholic Centre of Geneva
Isabel Apawo Phiri	World Council of Churches
Yasmine Idrissi Azzouzi	Caritas Internationalis
Hélène Durand Ballivet	International Catholic Centre of Geneva, Association Catholique Internationale de Services pour la Jeunesse Féminine
Jörg Basten	Renovabis
Martine Combemale	Human Resources without Borders
Mariléa Damasio	Mouvement Mondiale des Travailleurs Chrétiens
Markus Demele	German Commission for Justice and Peace, Kolping International
Hildegard Hagemann	German Commission for Justice and Peace, Kolping International
Larry Kohler	International Catholic Centre of Geneva
Lars Kupias	World Council of Churches, Communication
Mantalin Kyrou	International Catholic Migration Commission
Raquel Lara	International Coordination of Young Christian Workers
Nigussu Legesse	World Council of Churches
Prossy Nambatya	Joint Action Committee on Decent Work in Uganda, Bishops Conference Uganda
Stefano Nobile	Caritas Internationalis
Sarah Prenger	International Young Christian Workers
Pier Paolo Raimondi	Permanent Mission of the Holy See
Arsenio Fernandez Rodrigues	International Labour Organization
Sukaina Samhan	World Alliance of Young Men's Christian Associations
Werner Sengenberger	International Labour Organization
Berhanu Sinamo Deboch	International Coordination of Young Christian Workers
Elina Soomets	Estonia Labor Inspectorate

Veronica Usai	International Coordination of Young Christian Workers
Lyda Verstegen	International Alliance of Women
Joseph Viloux	Action Catholique Ouvrière, Mouvement Mondiale des Travailleurs Chrétiens
Olga Zhyvytsya	Caritas Internationalis

## 2. Links to panellists presentations

To consult the panellists full presentations, see the following links:

- Opening remarks by Ms. Maria D’Onofrio, CCIG Secretary General:  
[http://www.ccig-iccg.org/wp-content/uploads/2017/06/MariaDOnofrio\\_Opening\\_Remarks\\_CCIG\\_Labour\\_Inspection.07.06.2017.pdf](http://www.ccig-iccg.org/wp-content/uploads/2017/06/MariaDOnofrio_Opening_Remarks_CCIG_Labour_Inspection.07.06.2017.pdf)
- Presentation, *Challenges in Protecting the Rights of Migrant Workers*, by Ms. Jasmine Lidasan, Migrant Forum in Asia:  
[http://www.ccig-iccg.org/wp-content/uploads/2017/06/JasmineLidasan\\_Presentation\\_CCIG\\_Labour\\_Inspection.07.06.2017.pdf](http://www.ccig-iccg.org/wp-content/uploads/2017/06/JasmineLidasan_Presentation_CCIG_Labour_Inspection.07.06.2017.pdf)
- Presentation by Ms. Prossy Nambatya, Joint Action Committee for Decent Work in Uganda:  
[http://www.ccig-iccg.org/wp-content/uploads/2017/06/ProssyNambatya\\_Presentation\\_CCIG\\_Labour\\_Inspection.07.06.2017.pdf](http://www.ccig-iccg.org/wp-content/uploads/2017/06/ProssyNambatya_Presentation_CCIG_Labour_Inspection.07.06.2017.pdf)
- Presentation by Mr. Berhanu Sinamo, International President of the International Coordination for Young Christian Workers.  
[http://www.ccig-iccg.org/wp-content/uploads/2017/06/BerhanuSinamo\\_Presentation\\_CCIG\\_Labour\\_Inspection.07.06.2017.pdf](http://www.ccig-iccg.org/wp-content/uploads/2017/06/BerhanuSinamo_Presentation_CCIG_Labour_Inspection.07.06.2017.pdf)  
 Remarks by Mr. Berhanu Sinamo:  
[http://www.ccig-iccg.org/wp-content/uploads/2017/06/BerhanuSinamo\\_Notes\\_CCIG\\_Labour\\_Inspection.07.06.2017.pdf](http://www.ccig-iccg.org/wp-content/uploads/2017/06/BerhanuSinamo_Notes_CCIG_Labour_Inspection.07.06.2017.pdf)
- Remarks by Ms. Apinya Tajit, Caritas Thailand:  
[http://www.ccig-iccg.org/wp-content/uploads/2017/06/Apinya\\_Tajit\\_Notes\\_CCIG\\_Labour\\_Inspection.07.06.2017.pdf](http://www.ccig-iccg.org/wp-content/uploads/2017/06/Apinya_Tajit_Notes_CCIG_Labour_Inspection.07.06.2017.pdf)  
 Presentation by Ms. Apinya Tajit:  
[http://www.ccig-iccg.org/wp-content/uploads/2017/06/ApinyaTajit\\_Presentation\\_CCIG\\_Labour\\_Inspection.07.06.2017.pdf](http://www.ccig-iccg.org/wp-content/uploads/2017/06/ApinyaTajit_Presentation_CCIG_Labour_Inspection.07.06.2017.pdf)
- Presentation, *Labour Inspection in a Globalised World*, by Mr. Markus Demele, German Commission for Justice and Peace  
[http://www.ccig-iccg.org/wp-content/uploads/2017/06/MarkusDemele\\_Presentation\\_CCIG\\_Labour\\_Inspection.07.06.2017.pdf](http://www.ccig-iccg.org/wp-content/uploads/2017/06/MarkusDemele_Presentation_CCIG_Labour_Inspection.07.06.2017.pdf)  
 Remarks by Mr. Markus Demele

[http://www.ccig-iccg.org/wp-content/uploads/2017/06/MarkusDemele\\_Notes\\_CCIG\\_Labour\\_Inspection.07.06.2017.pdf](http://www.ccig-iccg.org/wp-content/uploads/2017/06/MarkusDemele_Notes_CCIG_Labour_Inspection.07.06.2017.pdf)

- Remarks by Mr. Arsenio Fernandez, Technical Specialist, Labour Administration, Labour Inspection and Occupational Safety and Health Branch at the ILO

[http://www.ccig-iccg.org/wp-content/uploads/2017/06/ArsenioFernandez\\_Notes\\_CCIG\\_Labour\\_Inspection.07.06.2017.pdf](http://www.ccig-iccg.org/wp-content/uploads/2017/06/ArsenioFernandez_Notes_CCIG_Labour_Inspection.07.06.2017.pdf)

- Remarks by Nicola Piper, Sydney Asia Pacific Migration Centre

[http://www.ccig-iccg.org/wp-content/uploads/2017/06/NicolaPiper\\_Notes\\_CCIG\\_Labour\\_Inspection.07.06.2017.pdf](http://www.ccig-iccg.org/wp-content/uploads/2017/06/NicolaPiper_Notes_CCIG_Labour_Inspection.07.06.2017.pdf)

To consult the publication “Labour inspection in a globalized world”:

- [http://www.justitia-et-pax.de/jp/publikationen/weitere\\_veroeffentlichungen/index.php](http://www.justitia-et-pax.de/jp/publikationen/weitere_veroeffentlichungen/index.php)

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