

EXAMPLES OF
HOW COUNTRIES
DETERMINE
HAZARDOUS
CHILD LABOUR

STEP BY STEP

Volume I:

Costa Rica

Netherlands

Pakistan

Sri Lanka



IPEC
INTERNATIONAL LABOUR OFFICE

International Programme on the Elimination of Child Labour



INTERNATIONAL LABOUR OFFICE

International Programme on the Elimination of Child Labour

EXAMPLES OF HOW COUNTRIES DETERMINE HAZARDOUS CHILD LABOUR

Volume I: Costa Rica Netherlands Pakistan Sri Lanka

Introduction

Countries ratifying ILO Convention No.182 must undertake a process of “determining” hazardous child labour. This process has been outlined in a companion brochure entitled, “Eliminating Hazardous Child Labour Step by Step”. The process involves making a list of hazardous work that will be prohibited to children and adolescents under the age of 18, identifying where this hazardous work is found, and putting the list into law as well as into action. Because this list is so essential to subsequent efforts to eliminate the worst forms of child labour, the Convention emphasizes the importance of a proper consultative process, especially with workers’ and employers’ organizations.

This brochure is the first in a series describing how different countries have undertaken this process. New examples will be added as they come available. These examples are not to be seen as models or “best practice”, but simply demonstrate a range of ways in which the matter is being approached. It is not helpful to simply follow exactly in the footsteps of another country, or to copy their list of hazardous work. If that were possible, C.182 would have put forward a universal list that all should follow. Instead, it leaves the determination of hazardous work to be done by the countries themselves, primarily because all countries are different, with a different mix of occupations and industries, and different types of child labour. It is in going through the full process that one gains an understanding of what hazardous child labour is in one’s own country. And by having key partners engaged in this process—government, trade unions, industry, occupational health and safety experts, civil society—a country is already well on the road to addressing the problem. People will be more ready to act, having been involved in the process of discovering the problem.

Six steps for determining hazardous child labour



Step 1: Create a structure

- Determine who will manage the process
- Involve employers and workers plus others with special expertise

Step 2: Collect existing and new information

- Review international standards
- Take stock of current laws and regulations
- Gather information on risks, hazards, and locations

Step 3: Compile the list of hazardous work

- Identify criteria for selecting items for the list
- Determine hazardous occupations, activities, and conditions
- Decide how to protect youth who are old enough to work legally

Step 4: Formalize the list

- Consult social partners
- Have the "competent authority" give the list legal force

Step 5: Promote and use the list

- Use the list for awareness-raising
- Set a timetable for action

Step 6: Review the list periodically

- Update the list and laws

Step 1.

Create a structure

- Determine who will manage the process
- Involve employers and workers and others with special expertise



Sri Lanka

Sri Lanka ratified Convention No. 182 on 1 March 2001. At that time, the country already had in place a committee that was regularly used to provide advice on child labour matters and which seemed to be a suitable structure for the C.182 purpose as well. Called the National Steering Committee for the International Programme on the Elimination of Child Labour (NSC), the committee is composed of high-level representatives from the Government (namely, the Ministry of Employment and Labour, the Ministry of Justice, the Ministry of Women, the Ministry of Education, the Women and Children's Affairs Division, and the National Child Protection Authority), staff from the ILO and UNICEF, representatives from workers' and employers' organisations, academic institutions, and non-governmental organizations (NGOs) active in the field of child labour.

After ratification of Convention No. 182, the Minister of Labour asked the NSC to advise him on a list of hazardous occupations and processes¹. Further to this request, the NSC decided to appoint a technical subcommittee "to determine the types of child labour likely to harm the health, safety or morals of children". The subcommittee consisted of government representatives from children's affairs, justice and law, and health, NGOs, and a representative of IPEC. To ensure that there was the necessary technical expertise, the NSC added to the subcommittee experts in the field of occupational safety and health (OSH) and industrial safety. Representatives of employers' and workers' organisations which were already part of the NSC itself also became members of the subcommittee. By including the social partners in this subcommittee work, Sri Lanka had a good basis for reaching consensus in the future when the official consultations would take place on the final list. Apart from this, social partners also brought expertise and practical insight that would contribute to the quality of the final list.

Pakistan

Pakistan is an Islamic Republic and follows a federal parliamentary system of democracy. It ratified Convention No. 182 on 11 October 2001 and started the process of determining hazardous child labour soon after.

The structure which was adopted by Pakistan was to use a project as a vehicle for determining hazardous child labour. Pakistan had decided to start a Time-Bound Programme (TBP) with the technical assistance of ILO-IPEC. (The aim of a TBP is the elimination of the worst forms of child labour within a specific time frame.) Thus, an important and crucial part of the preparatory phase of the TBP was devoted to the determination and identification of hazardous child labour.

The Ministry of Labour was designated as the responsible body for steering the process in general, but the Provincial Departments of Labour played a leading role in each of their respective Provinces.

Costa Rica

Costa Rica ratified Convention No 182 on 10 September 2001. Costa Rica created by decree the National Committee for the Prevention and Eradication of Child Labour and Protection of Young Workers, which is composed of Government (NO CAPITAL) representatives (Ministry of Labour and Social Security, Ministry of Health, Ministry of Childhood, Ministry of Education, Mixed Institute of Social Help, National Learning Institute, etc.). Employers' and workers' organizations, NGOs, UNICEF and ILO-IPEC were observers.

The Office of Attention and Eradication of Child Labour and Protection of Young Workers was founded in 1998 by the Minister of Labour and Social Security; this office acts as the Secretariate of the National Directive Committee for the Prevention and Eradication of Child Labour and Protection of Young Workers, and it also coordinates the actions of the Ministry of Labour regarding the observance of Conventions 138 and 182, both of them ratified by the country.

¹As referred to in Article 4, paragraph 1 of C.182, the "competent authority" is the organ or person that has the power to legislate a list of hazardous occupations or processes in order to implement article 3(d) of Convention no. 182. In the Sri Lankan context at the time, the competent authority was the Minister of Labour (see Step 4 for further details).

Step 2.

Collect existing and new information

- Review international standards
- Take stock of current laws and regulations
- Gather information on risks, hazards and locations

Apart from reviewing relevant international standards and gathering information on risks, hazards and locations in the country, it is also crucial to get a good understanding of existing legislation that relates to hazardous work for children. Since legislation is always evolving, it may even be expedient to examine if in the past provisions on hazardous occupations or processes for children have been enacted.

Sri Lanka

In Sri Lanka such a list was present under the main child labour law, the "Employment of Women, Young Persons and Children Act". A regulation, installing a list of hazardous occupations for children (up to 14 years), had been issued in the past, but was repealed in 2000 when a minimum age of 14 years for admission to employment was established. Although outdated, it was useful to draw on this material, and then see from the more recent standards, experiences and scientific data what would need to be added.

The Technical Committee studied and examined the laws in force in Sri Lanka relating to children and child labour in particular, other laws such as the Penal Code, the "Explosives Act", the "Poisons, Opium and Dangerous Drugs Ordinance", the "Mines and Minerals Law" and publications of the ILO relating to precarious employment and hazardous employment

Pakistan

In the preparatory phase of the TBP, the Pakistan government and IPEC generated information on the worst forms of child labour and its prevalence in order to develop a comprehensive Programme.

Before the Provincial consultations took place, the Government of Pakistan prepared an initial list of 14 hazardous occupations in consultation with Provincial governments, the social partners NGOs working in the field of child labour and the Centre for Improvement of Working Conditions and Environment (an occupational safety and health institute), and social partners. The list was based on the potential hazards of the different sectors of industry or occupations and the degree of hazards posed by the work to the health and safety of child workers. Existing legislation was taken into account as well.

It was found that "the Employment of Children Act" is the main child labour law (enacted in 1991) that gives effect to the Convention on the Rights of the Child. As stated in Step 1, it does not stipulate a general minimum age for admission to employment or work, although it prohibits any child under the age of 15 years to be employed in hazardous occupations or processes.



Costa Rica

The Childhood and Young Persons Code was approved in 1998, and it adjusts the country regulations regarding childhood, to the International Conventions ratified by the country. There is a chapter in it which regulates the Special Regime of Protection of Young Workers between 15 and 18.

It is important to point out that in January 2002, before the ratification of Convention 182, and in accordance with Convention 138, the Ministry of Labour and Social Security elaborated, by means of a Ministerial Resolution, a regulation of Forbidden and Restricted Activities for young people, which constitutes a big development regarding legislation.

After the ratification of Convention 182, and in accordance with all its provisions, the National Directive Committee requested ILO-IPEC for technical support in determining hazardous labour carried out by children and young people. The process started, therefore, under the supervision of the Ministry of Labor and Social Security, close together with the IPEC program. It was a significant moment for the country, since IPEC together with different national institutions, initiated a project based on some preparatory activities for the immediate eradication of the worst forms of Child Labour, which would eventually become a Time-Bound Program in 2003.

² Ratified by Pakistan on November 12, 1990.

Step 3.

Compile the list of hazardous occupations

- Identify criteria for selecting items for the list
- Determine hazardous occupations, activities, and conditions
- Decide how to protect youth who are old enough to work legally

Sri Lanka

To facilitate the process, including the organization of the necessary meetings, the Ministry of Labour arranged for a national consultant. ILO-IPEC also engaged an international occupational health and safety specialist from a neighboring country that had already gone through the process of hazard determination during the final stages of the process to ensure a broader perspective to the exercise. Together, these two consultants acted as resource persons to the Government of Sri Lanka in its determination of hazardous child labour. They were able to provide complementary internal and external viewpoints and to expedite the process, without which the burden would have had to rest on existing staff.

When the government was ready to embark on the determination process, the national and international consultants, along with the IPEC staff, compiled relevant documents. Next, the consultant and technical team held discussions with the IPEC staff to lay out the strategy for subsequent meetings and to sketch out a plan for a formal tripartite workshop. IPEC then organized a series of sub national level workshops to get input that would be helpful in compiling the list of hazardous child labour. The details of these workshops are as follows:

(1) A sub-national workshop was organized to help the national consultant to formulate a strategic plan concerning the worst forms of child labour in Sri Lanka. Some of the group work included enumerating HFCL and an occupational analysis followed. These were fed into a consolidated list for discussion at a tripartite consultation. The meetings at sub national level too included the participation of the

social partners whilst also extending it to NGOs and professionals. The participants represented the government, trade unions and NGOs. The discussions were facilitated by a representative of the department of labour and ILO-IPEC. This group identified 27 hazardous forms of child labour.

(2) Workshops of children (3 in all) were held to solicit their perspectives on what should be prohibited work for children and young people. Approximately ninety girls and boys, ranging in age from 10 to 18 participated and identified a list of 32 areas of hazardous child labour based on their interpretation of HFCL.

The Technical Committee had six sittings. In these, the Committee reviewed the outcomes of the above meetings plus available occupational safety and health studies, child labour project reports and statistics, and the earlier legislation. Based on these discussions, the Committee prepared a draft report that included its recommendations concerning work to be included in the list. ILO/IPEC Geneva was sent this draft report for comment. Comments were made on the report from both the legal and occupational health perspectives, and duly transmitted to the Technical Committee. The Committee then met once again and discussed the comments in detail and made its own observations in the final report. In this report, the Committee identified a list of 25 hazardous forms of child labour (HFCL) relating to article 3(d) of C.182. Subsequently, the findings of the sub national consultations with adults and children were added on to this list. The NSC was kept posted regularly on the progress of the technical committee work. A formal tripartite workshop was then proposed by the technical committee to the NSC. The plans were

presented to the NSC at which ILO offered the services of an international expert to facilitate the final phase of the process. The NSC recommended that ILO enlists the services of an expert within the region. At the planning stage, the consultants (the national and international) and key figures from the Department of Labour met to review initial plans and the list of participants. This resulted in an additional three experts in occupational health and safety being invited.

The Secretary, Ministry of Employment and Labour chaired the workshop. The Consultant obtained the support of a leading pediatrician and head of the National Child Protection Authority to assist them on technical issues.. The national and international experts and IPEC officials facilitated the discussions. The participants were divided into six groups based on their background, so that there was a uniform distribution of experts in each group. Each group was given a package of materials which included (a) the lists of hazardous child labour that had emerged from the previous series of preparatory workshops and Committee deliberations, (b) the ILO brochure entitled Eliminating Hazardous Child labour Step by Step, and (c) forms which had been developed by the consultants to facilitate decisions. At the end of the day, each group was asked to summarize the outcome of their discussion. The result of the workshop was a list of 48 items recommended for prohibition some of them absolute and some others conditional - based on the norms set per ILO C 138 and C 182. A report on the proceedings accompanied the draft list and was developed by the consultants as an outcome on the exercise.

Pakistan

It was decided that the determination process would be best served when the different Provinces of Pakistan would have an important role to play. There were several reasons for this decision. First of all, the implementation of child labour legislation is at the provincial level. Secondly, and more importantly, by taking a provincial approach, sectors would be taken into account that are specific to each province. For

instance, deep-sea fishing only occurs in two Provinces, while ship-breaking activities are pursued in only one Province.

In order to involve stakeholders from the start, a series of consultative workshops were organized in each Province. These included employers and employees. Six consultative workshops were held altogether in main cities of each of the different Provinces (Peshawar, Multan, Lahore, Hyderabad, Harachi and Quetta). After these, a national tripartite workshop in Islamabad was organised. In addition to the social partners, delegates from the Provincial Labour Departments, the Federal labour ministry, the Ministry and Provincial departments of Social Welfare, representatives of civil society and UNICEF took part in the consultations.

After each Provincial workshop, a list of hazardous occupations and processes was formulated pertinent to the specific situation of the Province in question. The National Consultative workshop was then held in order to discuss the Provincial lists and formulate a national one. As a result, all the provinces and other stakeholders were able to reach consensus on a list of 29 hazardous occupations and processes that would be prohibited to children under the age of 18.

The Netherlands

The Netherlands ratified Convention No. 138 on 14 September 1976 and declared the minimum age for admission to employment or work to be 15 years. Convention No. 182 was ratified on 14 February 2002. Another important instrument to which the Netherlands is bound is a Directive of the European Community from 1994, No. 94/33/EC, concerning the protection of young people at work. This Directive requires the prohibition of employing young people in several types of hazardous work.

In the Netherlands, employment of children under the age of 16 years is prohibited. Not only the employer but also the guardian of the child (usually the parents) is responsible for living up to this ▶

Step 3.

- Compile the list of hazardous occupations



prohibition. The reason why the Netherlands has issued a minimum age of 15 years upon ratification of Convention No. 138, is that children of 15 years are allowed to do non-industrial light work. The definition of this type of work has been elaborated in a regulation, which states for instance that the child must not lift more than 10 kilograms. Also, the work may not interfere with the education of the child, which means that on a schoolday a child of 15 years old cannot do non-industrial light work for more than two hours. Special rules have been made for delivering newspapers as it is a job that is often performed by children. The minimum age remains 15 years, but an extra condition is that the parents need to co-sign the employment contract.

Directly pertaining to the “hazardous list”, Dutch legislation delineates occupations and processes which are absolutely prohibited to children under the age of 18 years.³ The main prohibitions are laid down in the Working Conditions Decree, which has been enacted before the adoption and subsequent ratification of Convention no. 182.

In the Dutch context, it is therefore useful to read the absolute prohibitions together with regulations for children above the minimum age of 16 years. Dutch legislation stipulates that children of 16 or 17 years old may only perform certain occupations or processes if and when there is appropriate expert supervision present. This requirement means that the supervisor needs to make sure first if the child has been given the right training or education for the job and has been well-informed of any potential risks associated with the job. Apart from this, it means in general that if the supervision is not organised in the way that dangers can be prevented, it is prohibited to employ children under the age of 18 years for this type of work. The occupations or processes where adequate expert supervision is required partly relate to the prohibited list. For example, it is absolutely prohibited to let children work with “poisonous substances”, whereas it is only allowed to employ children of 16 or 17 years old for work with “irritating” substances if there is the defined supervision present. Also, occupations are included that do not relate to the “list”, such as work in a slaughterhouse or boring, repetitive work on the basis of piece-rate.

Another aspect of the list which is important to take into account is that it should be practical. The list should have some detail, but it should not be too difficult for labour inspectors to enforce and employers should be able to understand the rules in order to follow them. The Netherlands has developed a means of facilitating implementation of the list. For purposes of enforcement, prevention of accidents and identification of hazardous work, every company should create a "risk inventory and evaluation". With regard to young employees, the employer must examine, among other things, what specific risks for children exist within the company (e.g. what kind of substances could they get in touch with, is there a risk of falling down etc.), what measures are being taken to prevent and limit the risks and what the age of the child is. By making this report, which should be done in co-operation with the working conditions service of the company, the prevalence of hazards are reduced and the employer gets insight into the risks for working children. The report also gives the labour inspectors an easy overview of the working conditions in a specific company. On the basis of this risk inventory and evaluation, the employer needs to inform all employees, including children, on the risks of their jobs and the preventive and protective measures being taken.

³Note: When implementing article 3(d) of Convention no. 182, it is expedient to also look into potentially dangerous work that does not end upon the list.

Costa Rica

It is within this framework that a group of studies and analysis starts, following three different stages:

The first stage concerns the current legislation related to Child Labour and Protection of Young Workers; both a compilation and an analysis of the legislation were accomplished.

In the second stage, an analysis was carried out using the information from the IX National Census of Population and Housing, specifically:

- ✓ Occupation.
- ✓ Occupational level.
- ✓ Occupational accidents.
- ✓ School Attendance.
- ✓ Type and nature of school activities.
- ✓ Level of income and basic needs.

The analysis of the census data considered the linkages between work, lack of school attendance, and gaps in coverage of basic needs (poverty level). The labour carried out by children and young people was identified and located geographically, so it was possible to know in which part of the country the child labour rates were higher, especially those of the worst forms. Based on this analysis several intervention programs are now being developed.

The third stage will start once this information has been reviewed by Occupational Health Council of the Ministry of Labor and Social Security, and the Office of Attention and Eradication of Child Labour and Protection of Young Workers. and with the technical support of ILO-IPEC enter on the 3rd stage. The already existing list will become more detailed and complete with the addition of the data from Census. Finally, legislation on the prohibited and restricted activities for young people will be enacted.

Step 4.

Formalise the list

- Consult the social partners
- Have the “competent authority” give you the list legal force

Sri Lanka

Once the draft report of hazardous work had been finalized by the Consultants in consultation with the members of the Technical Committee, it was presented by the Consultants to the National Steering Committee (NSC). The NSC expressed general agreement with its contents and, after providing comments and adding one more item to the list, endorsed it. The list was presented then to the National Labour Advisory Council (NLAC), a tripartite body that advises on various labour issues and is chaired by the Minister of Employment and Labour. Since the Minister is empowered to prohibit “absolutely the employment of children in any specified occupation” and can prescribe “the age below which children are not to be employed”, this effectively means that the Minister of Labour is “the competent authority” noted in Convention No. 182 and who—after consultation with the social partners in the NLAC—may enact the list. Following approval of the Parliament, the Minister can issue a regulation and publish this in the Official Gazette. Prior to issuing regulations and parallel to seeking the approval of parliament, with assistance from the ILO-IPEC, the legislative framework for WFCL including HFCL is being reviewed.

The preliminary report of the review exercise was to be presented to and discussed amongst stakeholders which includes members of the judiciary drawn from the Court of Appeal as well. Recommendations made then will be considered prior to amending the law to give effect to the exercise.

The Netherlands

Article 4 Paragraph 1 of the Convention prescribes that the social partners be consulted when hazardous child labour is being determined. In the case of the Netherlands, the social partners were consulted at an earlier point, when ILO Convention No. 144, concerning Tripartite Consultation, was ratified. Since the Netherlands has ratified this Convention, the Dutch social partners were also consulted on the possible ratification of Convention No. 182. The social partners have thus been involved in the process at an early stage, which improves the quality of the process.

A hazardous “list” was originally included in the Working Conditions Act of 1998, and based on this Act, the “Working Conditions Decree” was issued. Although the Government generally does not need the approval of Parliament for a decree, it is customary for the Government to seek advice of the Social Economic Council. This Council is tri-partite in its structure and is the main advisory body of the government on social and economic policy. Apart from this function, the Council has administrative tasks and is also involved in enforcing industrial relations legislation. Hence, it is also the forum for negotiations between the social partners (and the government) on issues such as wage moderation and labour market flexibility. Through this channel, the employers’ and workers’ organisations have been consulted on the enactment of the Working Conditions Decree.

While the “list” should be practical and comprehensible, it is inevitable that technical descriptions will be used, for example when

describing the level of exposure to radiation or to dangerous substances. In order to make the piece of legislation that deals with the hazardous “list” not too long or difficult to understand, it makes reference to other legislation. In the case of the Netherlands, the Working Conditions Decree refers to another Act, which has a detailed list of substances that have a specific label such as “poisonous” or “carcinogenic”.

Costa Rica

Some experts on child and young people’s labour, childhood legislation and occupational health were interviewed regarding:

- ✓ The national consultation
- ✓ The legal way of determining hazardous labour.
- ✓ The character of the rule.
- ✓ The application of the legal instrument.
- ✓ The possible objection for the enactment of the rule.

Once the study was completed, it was put through a national Tripartite Consultation (Government, employers and workers plus) NGOs and international organizations (UNICEF and ILO), as well as experts on childhood and young people.

The Council of Occupational Health of the Ministry of Labour and Social Security had an important role in this process of Consultation, and it was as well the one who were in charge of the Regulation of Prohibited and Restricted Activities of 2002.

In addition to this National Consultation, some studies and awareness workshops were carried out with employers, workers, NGOs and delegates from the different political groups in the Legislative Assembly in order to allow them a chance to comment and fully understand this unique document.



Step 5.

Collect existing and new information

- Promote and use the list for awareness-raising
- Set a time table for action

Once the list has been created, the next step may be raising awareness about its existence. This does not only involve the training of labour inspectors but also informing employers, children and the wider public. It could also be helpful to inform the public on the number of children that perform hazardous work. In accordance with Article 6 Paragraph 2 of the Convention, such a campaign should be made in consultation with the social partners and other concerned groups.

The Netherlands

The Netherlands regards the setting up of a programme of action as its most important obligation under Convention No. 182. The action programme it has established focuses on prevention, awareness-raising and enforcement of the law against the worst forms of child labour, including hazardous work. Before the programme has been established, the social partners and a number of NGOs have been consulted in order to get their views and wishes. In this way, the programme of action has been set up with key stakeholders involved during the entire process.

Several actions have been taken in order to raise awareness. A free information package on the rules of work was made for schools. It includes a teacher's manual and a leaflet for the children. Also a brochure has been published in several languages for the general public on the rules concerning work by children, as well as another specifically focused on those who employ or wish to employ children. The Ministry of Social Affairs and Employment, in close co-operation with the youth organisations of two major Dutch trade unions, has recently opened an internet site for children where they are informed on all sorts of labour-related issues⁴. For the many children that work during the holiday season, a special brochure on holiday work has been published.

Also an integral part of the action programme are the projects that are carried out by the labour inspectorate. Projects have been done that focus on child labour during holidays (due to its prevalence), but also outside the holiday-season in order to see the effects of the new legislation. The latter projects have paid specific attention to hazardous work for children under the age of 18 years.

⁴www.jongerenloketet.szw.nl

Costa Rica

A new stage started when the consultation process finished and all the comments taken into account in the document. A new Commission consisting of the legal department, the inspection department, the occupational health department and experts on child labour, was created within the Ministry of Labour and Social Security. The task of this Commission was to draft a bill on the Prohibition of Hazardous and Unhealthy Labour for Young Workers". The next step is for the Minister of Labour to present this draft bill in the Legislative Assembly in accordance with Law No 8122-A which says:

"2nd Article – For the goods of the 4th article of Convention 182, determining the types of child labour likely to harm the health, safety or morals of children can only be determined by law; therefore, any other authority is not competent enough as to make such a determination"



Step 6.

Review the list periodically

- Update the list
- Update the laws and regulations accordingly

Since C.182 has only recently been adopted, there are as yet no countries which are at the stage of revising their list. However, there are a considerable number of countries which have developed lists or legislation on hazardous child labour under earlier Conventions, such as C.138. These can now be reviewed or revised in light of C.182 and R.190.

Costa Rica

There will be a new, revised and extended regulation next to the previously mentioned law, as it was explained before about prohibited labours; it will be revised regularly as it was pointed out in the "Draft Bill about the Prohibition of Hazardous and Unhealthy Labour for Young Workers"



For further
information,
contact



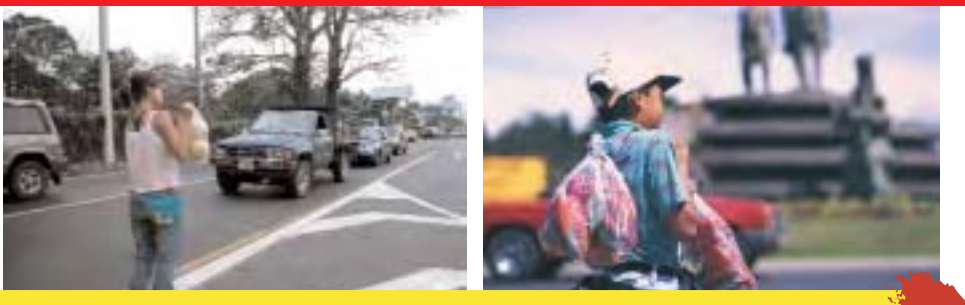
International Programme for the Elimination of Child Labour
4, route des Morillons
CH-1211 Geneva 22, Switzerland
Tel: +41 22 799-8181
Fax: +41 22 799-8771
e-mail: childlabour@ilo.org
www.ilo.org/childlabour

STOP





HAZARDOUS CHILD LABOUR



STOP HAZARDOUS CHILD LABOUR



IPEC

INTERNATIONAL LABOUR OFFICE