Compliance of Pakistan with ILO standards on freedom of association

I. Ahmad

Centre for Labour Research,
Rawalpindi, Punjab, Pakistan

For citation: Ahmad, Iftikhar. 2023. "Compliance of Pakistan with ILO Standards on Freedom of Association." *Russian Journal of Labour & Law* 13: 319–328. https://doi.org/10.21638/spbu32.2023.122

The author examines the adherence of Pakistani legislation with ILO standards regarding freedom of association. Current Industrial Relations regulation has undergone several positive changes on a provincial level, including granting rights to form trade unions and collectively bargain, expanding union rights to female workers in the agricultural sector in Sadh and Punjab, creating the Industrial Relations Bill in Balochistan, expanding the right to freedom of association and collective bargaining to workers in Special Economic Zones, etc. However, despite the indisputable progress, Industrial Relations regulation is subject to criticism. For instance, it still does not resolve the inability of an employee to be a member of several trade unions if he/she works part-time although Pakistani law allows workers to work at multiple workplaces under certain conditions on a case-by-case basis. Since the legislation of Pakistan does not recognize and regulate part-time work, those few that are allowed to be doubly employed are not subject to the fundamental rights of a full-time worker including the right to freedom of association. Besides that, Industrial Relations regulation considers the concept of go-slow an unfair labour practice although ILO has justified it in multiple conventions. The author finds the aforementioned criticism valid. However, regarding the empowerment of the Registrar to inspect the accounts and records of a registered trade union, the author considers the criticism unwarranted. In the conclusion the author mentions the necessity of the creation of regulation on the enterprise level similar to that which exists on the provincial one.

Keywords: freedom of association, industrial relations regulation, International Labour Organization standards.

1. Introduction

The right to form an association is considered to be the social, economic and political right of a person. The principle of freedom of association is not only enshrined in the Universal Declaration on Human Rights (UDHR)[1], International Covenant on Civil and Political Rights (ICCPR)[2] and International Covenant on Economic, Social and Cul-

[1] Article 20 of the UDHR. Available at: https://www.un.org/en/about-us/universal-declaration-of-human-rights (accessed: 24.05.2022).

[2] Article 22 of the ICCPR. Available at: https://www.ohchr.org/en/professionalinterest/pages/ccpr.aspx (accessed: 24.05.2022).

tural Rights (ICESCR)[3] but also in ILO Constitution (1919)[4], the Philadelphia Declaration (1944)[5], the ILO Declaration on Fundamental Principles and Rights at Work (1998)[6], and the ILO Declaration on Social Justice for a Fair Globalization (2008)[7]. The right to organize and form organizations of employers and workers is the prerequisite for sound social dialogue and collective bargaining. The right to freedom of association ensures that workers and employers can freely associate to efficiently negotiate working conditions and work relations. Collective bargaining not only allows for negotiating better working conditions but also prevents labour disputes and thus increases workers' productivity.

2. Basic research

2.1. International legal regulation of freedom of association

Freedom of Association and Protection of the Right to Organise Convention (no. 87), ratified by Pakistan in 1951, requires that workers have the right to establish and join organizations of their own choice without previous authorisation. They must be free to draw up their constitutions and rules, elect their representatives in full freedom, organise their administration and activities and formulate their programmes. The Convention further contains provisions through which the State should take all necessary and appropriate measures to ensure that workers and employers freely exercise the right to organize. Moreover, the State should refrain from any interference which would restrict these rights.

Right to Organise and Collective Bargaining Convention (no. 98), ratified by Pakistan in 1952, requires that workers should be protected against acts of anti-union discrimination with respect to their employment. The employment of a worker must not be subjected to the condition that he shall not join a union or shall resign from trade union membership. Similarly, causing the dismissal of a worker or prejudicing a worker by reason of union membership or because of participation in union activities outside the working hours or during the working hours (with the consent of the employer) are acts of discrimination. Workers' and employers' organizations must enjoy adequate protection against any acts of interference by each other and especially acts that are designed to promote the domination or financing and control of workers' organizations by employers or employers' organizations. The Convention requires that necessary measures, appropriate to national conditions, must also be taken to encourage and promote the full development and utilization of machinery for promoting voluntary negotiations between workers' organizations and employers to regulate the terms and conditions of employment through collective agreements.

---

[3] Article 8 of the ICESCR. Available at: https://www.ohchr.org/en/professionalinterest/pages/cescr.aspx (accessed: 24.05.2022).

[4] Preamble of the ILO Constitution. Available at: https://www.ilo.org/dyn/normlex/en/f?p=1000:62:0::NO:62:P62_LIST_ENTRIE_ID:2453907:NO (accessed: 24.05.2022).

[5] Article 1(b) of the Philadelphia Declaration. Available at: https://www.ilo.org/legacy/english/inwork/cb-policy-guide/declarationofPhiladelphia1944.pdf (accessed: 24.05.2022).

[6] Article 2(a) of the ILO Declaration (1998). Available at: https://www.ilo.org/declaration/thedeclaration/textdeclaration/lang--en/index.htm (accessed: 24.05.2022).

[7] Article A(iv) of the ILO Declaration (2008). Available at: https://www.ilo.org/wcmsp5/groups/public/---dgreports/---cabinet/documents/genericdocument/wcms_371208.pdf (accessed: 24.05.2022).

The Industrial Relations legislation is usually criticized for having a long list of exclusions however these exclusions are based on the peculiar nature of the organizations and their functioning. Compared with IRO-2002 and IRA-2008, the list of exclusions however has reduced considerably. Other than security institutions and installations exclusively connected with the Armed Forces of Pakistan, IRA excludes institutions for the treatment or care of sick, infirm, destitute and mentally unfit persons as well as educational institutions, except that run on a commercial basis. The workers of charitable organizations are also excluded from the purview of labour legislation. The rationale behind excluding these institutions is that industrial action (strike, go-slow, etc.) can put the lives of sick, infirm and destitute people in danger. Similar is the case of charitable organizations. It must however be mentioned that despite these so-called exclusions, workers in these organizations have the right to form associations and negotiate with their employers for improvement in their employment terms and conditions.

2.2. Associations and unions in Pakistan

Under Article 17 of the Constitution of Pakistan, every citizen has the right to form associations or unions, thus every individual can form and join at least an association. In the healthcare sector, there are well-known examples of the Young Doctors Association, Pakistan Paramedical Staff Association, and All-Pakistan Lady Health Workers Employees Association[8], which are working for the protection of their members' rights (Junaidi 2013). In the print media, the Pakistan Federal Union of Journalists and All Pakistan Akhbar Farosh Federation are also well-known cases.

In the educational sector, the public sector has many associations as well as unions. This includes the notable case of the Punjab Teachers Union, registered in 1937 under the Trade Union Act of 1926 and certified as a collective bargaining agent. Other teachers' associations are registered under the Societies Registration Act of 1860. Some of the famous teachers' associations are Mutahida Mahaz Asatza (national), Tanzeem-e-Asatza (national) and Primary Teachers Associations (provincial).

Similarly, the public sector workers are not prohibited from forming associations rather the law allows occupational associations (confined to a distinct class of Government servants) under Government Servants (Conduct) Rules, 1964 (section 28). Similar conduct rules for civil servants have been notified at the provincial level under the respective Civil Servants Acts. These are Balochistan Government Servants (Conduct) Rules, 1979 (section 30); Khyber Pakhtunkhwa Government Servants (Conduct) Rules, 1987 (section 32); Punjab Government Servants (Conduct) Rules, 1966; and Sindh Civil Servants (Conduct) Rules, 2008 (section 31).

The All Pakistan Clerks Association (APCA) is a notable example of the association of persons engaged in the public sector in the lower grades (BPS 1-16) (Iqbal 2022)[9]. Similarly, the self-employed (and included in it are domestic and home-based workers)

[8] Pakistan has more than 100,000 lady health workers (LHWs). In line with the Supreme Court directions, the Government regularized the services of these LHWs and they have been salaried employees since 2013.

[9] In March 2021, the APCA was able to win a 25 % increase in basic wages, termed as Disparity Reduction Allowance. The new allowance is applicable to civil employees of Federal Government (BS 1-19) who have ever been allowed additional allowances. Available at: https://minutemirror.com.pk/disparity-reduction-allowance-29530 (accessed: 24.05.2022).

can form associations as guaranteed under article 17 of the Constitution. Under the Sindh Home-Based Workers Act 2018, the provisions of the Sindh Industrial Relations Act 2013, and thus the right to form trade unions, is expanded to all Home-Based Workers. Furthermore, Sindh and Balochistan have allowed the formation of trade unions in the agriculture and fisheries sectors through amendments in their industrial relations legislation. Two unions and one federation of home-based workers have also been registered in Sindh.

The Industrial Relations Acts further specify that supervisors and apprentices are also treated as workmen and have the right to form and join organizations. The industrial relations legislation considers any person responsible for the management, supervision and control of the establishment as an employer. Thus, managerial employees have all those rights of association that employers have under the laws. Industrial Relations legislation clearly stipulates that "employers may establish and, subject to the rules of the organization, may join associations of their own choice without previous authorization". Similarly, they are allowed to establish and join federations and confederations and any such organization, federation or confederation may affiliate with international organizations and confederations of employers' organizations. Thus, senior white-collar workers also have the rights to form associations, federations and confederations for protecting their rights.

A step towards achieving gender parity has been taken by fixing the number of women trade union officers/executives in the same proportion in which they are employed in the establishment. Such provision has been added through section 6(2)(c) in the Punjab Industrial Relations Act 2010 and section 3(i) in the Sindh Industrial Relations Act 2013.

2.3. Development of the legislation on freedom of association in Pakistani law

The area of Freedom of Association has seen a few legislative improvements. The Azad Jammu and Kashmir Industrial Relations Act was passed in 2017. This extended the right to form trade unions and collectively bargain to Azad Jammu & Kashmir, as is provided in the rest of Pakistan. In addition, in 2019, coverage of union rights was expanded to women agricultural workers in Sindh through the 2019 Sindh Women Agricultural Workers Act. Furthermore, under the 2016 Special Economic Zones Act, all labour laws have been expanded to workers engaged in SEZs. This translates to the right to freedom of association and collective bargaining for SEZ labourers.

In order to ensure freedom of association and freedom to collectively bargain, hurdles in the registration of trade unions have been removed. Amendments have been made to the Punjab Industrial Relations Act, 2010 (PIRA 2010) to ensure effective and meaningful representation of women workers in the executive body of the trade unions where a certain number of women workers is ordinarily employed. Moreover, there is no restriction on the women workers employed in the agricultural sector to form or join trade unions of their choice under the Punjab Industrial Relations Act, 2010. At present, there are 1376 registered trade unions in Punjab enjoying membership of around 274,930 industrial workers. Workers of the informal sector may also register under PIRA 2010, and domestic workers have already registered unions.

Under Clause 1(3) of the 2013 Sindh Industrial Relations Act (SIRA 2013), workers employed in the fishing and agriculture sector have also been granted the right of trade unionism. Accordingly, the workers have the right to form trade unions, determine collective bargaining agents for the establishments they are working in, raise industrial disputes and raise individual grievances for redressal. However, owing to typical socioeconomic conditions and illiteracy, the expected number of trade unions applied for registration is at a minimum and only two unions of agriculture workers and three landlord associations have been registered by the Registrar of Trade Unions. The Sindh Department of Labour is striving very hard to create awareness among the agriculture workers to register their trade unions and in this regard a series of workshops was conducted in collaboration with ILO at Mirpurkhas, Sanghar and Shahdadpur, giving awareness of the rights of workers under SIRA 2013 under which 250 male agriculture workers and 200 female agriculture workers were educated on the right of association under SIRA 2013.

As per the Khyber Pakhtunkhwa Industrial Relation Act, 2010 (KPIRA 2010) both male and female workers are entitled to the right of freedom of association, peaceful assembly and collective bargaining. Rules under KPIRA 2010 have been framed.

Unionization in Balochistan has been adversely affected due to the Trans-Provincial provision in the Industrial Relations Act, 2012. The employers take ill benefits from the Trans-Provincial provision which has decreased the number of provincial unions. The workers' organizations in the 9th Provincial Tripartite Consultation Committee's meeting requested the Labour Department to extend a plea to Federal Govt. for any appropriate amendment in IRA, 2012 for the survival of unionism at the provincial level. Furthermore, the Balochistan Industrial Relations Bill 2020 has been drafted and has been brought in line with ILO convention standards. The Bill will now be sent to the relevant law department for vetting. Currently, 343 trade unions are registered in Balochistan, and there are 45 collective bargaining agents.

Similarly, the Registration of ICT-based unions falls within the domain of NIRC under the Industrial Relations Act, 2012. It is of utmost importance that ICT should have an IRA of its own so that not only appellate forums for the ICT wages Authority under the payment of wages Act be created but at the same time, the ICT labour department should also be empowered to register ICT-based unions. Currently, the registration of ICT-based unions has gone down tremendously since the introduction of the IRA in 2012.

2.4. Criticism of the Pakistani legislation regarding freedom of association

The ILO Committee (CEACR) had observed that government must not violate the rights of workers' organizations to organize their administration and to formulate their programmes by specifying the term of a trade union office and the frequency of meetings of a union's executive and general body in a trade union constitution. The industrial relations laws prescribe the general guidelines/requirements for the registration of a trade union. The legislation also stipulates the requisite information that a trade union constitution must contain. However, the formulation of the constitution lies with the union itself. These provisions have been incorporated into the industrial relations laws to create harmony among different trade unions and to ensure that homogeneous information is provided in the constitutions of trade unions. Legislation has prescribed a standard format

and basic information for incorporation in the trade unions' constitutions. Considerable flexibility is already available and unions can decide their matters accordingly. The requirement that a trade union officer may be elected for two years promotes trade union democracy and gives chance to other members to become part of the trade union executive. The other provisions (restoration of a trade union membership or compensation to a member by the union as provided under section 48 of IRA 2012) are there to construct check and balance for the healthy promotion of trade union activities in the country so that workers are not punished by their unions for not participating in an illegal strike or lockout.

CEACR has made observations repeatedly regarding disqualification of a person on becoming or remaining an officer of the trade union after being convicted and imprisoned for an offence involving moral turpitude. The Provincial industrial relations laws now permanently disqualify a person from a trade union office on his conviction. The federal law however stipulates that conviction and imprisonment should not stop a person from being elected as an officer of a trade union on a lapse of a certain time period (fixed as 5 years under the IRA 2012) after the completion of sentence. A person found guilty of moral turpitude or who is convicted of a criminal offence of heinous nature under the 1860 Pakistan Penal Code such as theft, assault, murder or attempt to murder, etc. cannot be allowed to hold the position of trust in which he/she has to represent the workers before the employer and the government.

Industrial Relations legislation has been criticized many times for not allowing workers to become members of more than one trade union (if they are engaged in more than one job in different sectors or occupations), however, the situation is not as simple as it looks. A worker, even if he/she is involved in different occupations in the same enterprise (for some hours in one job and other hours in another job), cannot be allowed to become a member of more than one trade union at a time since that worker is supposed to vote during referendums (for determination of collective bargaining agent) and this may cause ambiguity/overlapping. However, interesting is the case of workers engaged in employment (for limited hours/part-time work) in two different workplaces. Current labour legislation does not recognize part-time work and thus does not regulate it. There is a restriction on double employment of a worker under the 1934 Factories Act, therefore a worker is not usually allowed to engage in employment at two different workplaces and thus cannot become a member of more than one trade union. The Factories Rules authorise an Inspector to permit the employment of an adult make worker in more than one factory on the same day if he/she is satisfied that the total working hours of such workers on any one day do not exceed ten hours and that such worker receives weekly holiday as specified under the law. This issue arises since labour legislation does not recognize part-time work and there is only a limited number of workers who are engaged in part-time work. The Draft Model Provincial Anti-Discrimination (Employment and Occupation) Act, 2015, developed by the federal Ministry is the only law, which defines part-time work and gives these workers' rights equivalent to those of full-time workers.

The provincial governments must enact laws and regulate part-time work ensuring that these workers are eligible for all rights guaranteed under labour legislation and available to full-time workers. The provincial Governments have further explained that the restriction on becoming a member of more than one trade union is applicable to a specific workplace only. If a worker is engaged in work at multiple workplaces, they can become a

member of more than one trade union depending on the number of jobs they are engaged in. In the Form-C of the Provincial Industrial Relations Rules, in all provinces a declaration from the trade union member stating the following: "I do hereby declare that I am not a member of any other trade union in the establishment/group of establishments/industry (as the case may be) to which the trade union relates" is required.

Hence, it is evident that the prohibition of union membership in more than one trade union is applicable only at the enterprise level. If a worker is working in more than one enterprise, no such restriction is applicable to such a worker. Both the federal and provincial industrial labour legislation require that every third and subsequent union must have at least 20 % of the workers employed in the establishment as its members as a pre-condition for its registration. The government has been contending that these provisions are included to avoid the mushroom growth of ineffective trade unions, maintain the effectiveness of CBAs and promote healthy trade union activities. However, it has turned counterproductive, as it is allowing union-busting by employers through the formation of two pocket unions before a genuine union can be registered. While those first two unions do not have to meet any such requirements (their individual membership can be as less as seven workers), the third union has to have 20 % of workers in an enterprise as its members. In large enterprises, the 20%-membership condition actually plays against workers' right to join and form a union. If the aim is to control the mushroom growth and multiplicity of trade unions, membership requirements should be the same for every union. Even in the case of genuine trade unionism, workers must have the option to establish a new union for reasons of independence, effectiveness and on the basis of ideological choice. The arbitrary trade union unity imposed directly or indirectly by law is contrary to the freedom of association right. Law can require minimum membership however that number must be fixed in a reasonable manner so that the establishment of organizations is not hindered. The minimum membership criterion must take into account the level at which a trade union is being established (industry or enterprise level) and the size of the enterprise (thus the use of percentages instead of numbers is preferable).

Under the federal and provincial industrial relations legislation, certain rights (especially the right to represent workers in any proceedings and to check-off facilities) are granted only to the most representative unions, i. e., collective bargaining agents. However, the distinction between the most representative union (CBAs) and minority unions (non-CBAs) should not deprive the trade unions of defending the occupational interests of their members (especially representing them in proceedings).

The concept of go-slow is one of the preliminary forms of strike action and is justified under provisions of C87 & C98. It is considered an unfair labour practice under the current federal and provincial industrial relations legislation. The Standing Orders Ordinance 1968 (and its provincial variants) considers go-slow as gross misconduct, which can lead to summary dismissal of a person without any notice and severance payment. The Industrial Relations legislation and Standing Orders Ordinance define go-slow as an organized, deliberate and purposeful slowing down of normal output, or the deterioration of the normal quality of work by a body of workmen acting in a concerted manner. The restrictions as to the form of strike action (including go-slow) can only be justified if the action ceases to be peaceful. Go-slow strikes (slowing down the pace of work) and work-to-rule (strict adherence to rules) actions are also covered by provisions of C87 & 98.

Go-slow (especially the part which leads to slowing down of normal output) needs to be regulated properly instead of declaring it as an unfair labour practice. Go-slow can be allowed for certain days and on the completion of such days, the trade union must either resort to a full strike or go back to normal work. If the go-slow leads to deterioration of the normal quality of work, other sanctions can be applied. There is no doubt that allowing go-slow (leading to the deterioration of quality of work) as a legal form of industrial action can adversely affect the productivity of the concerned establishment and can be used as a weapon against the employers and economic activity. However, even in that case, it should not lead to summary dismissal.

The Federal and Provincial Industrial Relations legislation has been criticized for conferring on the Registrar the power to inspect the accounts and records of a registered trade union or investigate or hold such inquiry into the affairs of a trade union (5(d) of the IRA, 15(e) of the BIRA, and 15(d) of the KPIRA, PIRA and SIRA). The reality is that the Registrar of Trade Unions exercises vigilance upon the affairs of a trade union with a view to ensure that the unions work properly and there is no embezzlement of its funds. The Registrar of trade unions is empowered to inspect the accounts and records of the registered trade union so that the funds of the union are utilized transparently. The spirit of the relevant provision of the law is to prevent malpractices in the affairs of the trade union. It is not a coercive measure rather it is a facilitative one by the Government to ensure that union funds are not embezzled by any corrupt executive. As for holding of inquiry in the affairs of a trade union, a Registrar does not act arbitrarily. The powers conferred on the office of Registrar are exercised only after receiving a complaint and/or if there are sufficient grounds to exercise such powers.

There also has been criticism on the long list of grounds allowing cancellation of a trade union's registration. These grounds include among others, the contravention to the provisions of Industrial Relations legislation or the trade union's own constitution, failure to submit returns to the registrar, obtaining less than a specific percentage of total votes polled in a referendum (10–15 %), embezzlement or misappropriation of funds, and election of a person, convicted of a heinous offense or offenses involving moral turpitude under Pakistan Penal Code, to the trade union executive.

The first clarification in this regard is that registration of a trade union is canceled only on the order of NIRC (at the Federal level) or Labour Courts (at the Provincial level). Registrar of Trade Unions, on its own, has no jurisdiction to cancel the trade union registration. This is not only provided under laws (11(2) of IRA; 12(2) of BIRA, KPIRA, PIRA & SIRA) but also regulated by different courts. The ground "contravention to the provision of Act or Union Constitution" is however too vague and needs amendment. Failure to submit returns to the Registrar must be kept as a ground for cancellation of a trade union's registration. It is only through requiring regular submission of annual returns that reliable trade union membership data can be collected and maintained. On the basis of that data, the most representative status of trade unions can be determined.

Governments are required to consult with the most representative unions and nominate a delegation comprising of the most representative unions to the international bodies. The Federal Ministry of OP&HRD had submitted a proposal to the Pakistan Bureau of Statistics to include trade union-related questions in the Labour Force Survey to determine the actual situation of trade unions and collective bargaining in the country. However, no progress could be achieved on that front.

The current legislation requires that in the event of the existence of a single union in an enterprise, it can be granted collective bargaining rights if one-third of the employed workers are its members. Although Pakistan follows the model of industrial relations where a Collective Bargaining Agent (CBA) is the sole and exclusive representative of all workers (after its determination), it would be worthwhile to look into the option of allowing a union having less than one-third of employed workers as its members to negotiate with the employers at least on behalf of its own members. The minimum requirement for this partial collective bargaining agent can be 15–20 % of employed workers as members. This process can attract workers towards unionization and can lead to higher union density in the country.

The Export Processing Zones Authority Rules exempt the EPZs from provisions of important labour laws including Industrial Relations legislation. There are eight (8) EPZs in Pakistan employing thousands of workers. These workers have no right to form and join unions, bargain collectively and strike. It is important to indicate here however that the 2016 Special Economic Zones Act requires applicability of all local labour and employment laws to SEZs as these are applicable to other territories of Pakistan (§ 30 of the Act & Rules 35 & 51). Pakistan may follow the Sri Lankan model here and require the applicability of the same labour laws inside and outside export processing zones. The Ministry of OP&HRD reviewed the draft Export Processing Zones (Employment and Service Conditions) Rules 2009 in November 2019, recommending some reforms. No corrective action has yet been taken by EPZA.

3. Conclusion

Industrial Relations legislation in Pakistan is enacted with the aim "to regulate the formation of trade unions and trade union activities, relations between employers and workmen and the avoidance and settlement of any differences or disputes arising between them." To facilitate this amicable settlement of disputes, many fora have been established under the IRAs. These include the institutions of shop steward, collective bargaining agent, joint management board, worker participation in management (management committee) and works council. There are also judicial fora of labour court and labour appellate tribunal. Management Committee and joint management boards have overlapping functions and thus need to be consolidated into one forum. Punjab and Sindh have already formed Joint Works Councils (by combining the functions of management committees and joint management boards) under their respective legislation. Similar provisions need to be incorporated in IRA 2012, KPIRA 2010 and BIRA 2010. While nearly a decade has passed after the enactment of new industrial relations legislation at the provincial level, it would be relevant to collect data on the establishment of a works council at the enterprise level.

The Ministry of Human Rights, in collaboration with the United Nations Development Program, has developed a National Action Plan on Business and Human Rights (2021–2026), aimed at ensuring observance of Pakistan's duty to protect against human rights abuses by third parties, including businesses, and creating an environment conducive to fostering corporate respect for human rights. The following actions have been recommended under the Action Plan in the area of freedom of association for the next five years.

References

Junaidi, Ikram. 2013. "100,000 lady health workers get their service regularized." *DAWN*. January 21, 2013. Available at: https://www.dawn.com/news/780257/100000-lady-health-workers-get-their-service-regularised (accessed: 24.05.2022).

Iqbal, Javed. 2022. "Disparity Reduction Allowance? Without improving service delivery, there is no possibility to reduce disparity." *Minute Mirror*. February 24, 2022. Available at: https://minutemirror.com.pk/disparity-reduction-allowance-29530/ (accessed: 24.05.2022).

Received: June 6, 2022
Accepted: June 30, 2022

Author's information:

Iftikhar Ahmad — Master in Industrial and Labour Relations; Ia72@cornell.edu