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Your request for observations of 26 May 2026
VN/8850/2026

Report to be submitted to the International Labour Organization (ILO) in 2026 on the application of ratified Conventions

Convention No. 190 concerning Violence and Harassment in the World of Work

In response to the request for observations, the Central Organisation of Finnish Trade Unions SAK and STTK submit the following observations. We reserve the right to supplement them.

INTERNATIONAL LABOUR OFFICE

REPORT FORM FOR THE VIOLENCE AND HARASSMENT CONVENTION, 2019 (No. 190)

The present report form is for the use of the countries which have ratified the Convention. It has been approved by the Governing Body of the International Labour Office, in accordance with article 22 of the ILO Constitution, which reads as follows: “Each of the Members agrees to make an annual report to the International Labour Office on the measures which it has taken to give effect to the provisions of Conventions to which it is a party. These reports shall be made in such form and shall contain such particulars as the Governing Body may request.”

The Government may deem it useful to consult the appended text of the [Violence and Harassment Recommendation, 2019 \(No. 206\)](#),¹ the provisions of which supplement the present Convention and can contribute to a better understanding of its requirements and facilitate its application.

Some of the matters with which this Convention deals may be beyond the immediate competence of the ministry responsible for labour questions, so that the preparation of a full report on the application of the Convention may necessitate consultation of other competent ministries or government agencies.

PRACTICAL GUIDANCE FOR DRAWING UP REPORTS

First report

If this is your Government’s first report following the entry into force of the Convention in your country, full information should be given on the way in which your country has given effect to its obligations under the Convention.

Please provide the information specifically requested below under each Article or group of Articles in the “implementing measures” box, with a reference to the relevant parts of the documents concerned (such as the relevant provisions of the laws, regulations or other measures, or collective agreements, including by extending or adapting existing occupational safety and health measures to cover violence and harassment and developing specific measures where necessary). If any of this material is available from the internet, the link to the relevant documents may be inserted in the “implementing measures” box. Otherwise, please provide a copy of these documents in the language the document has been drafted or it is available.

¹ For questions regarding Article 10, please see, in particular, Paragraphs 14, 16, 17 and 18 of Recommendation No. 206.

Subsequent reports

In subsequent reports, your Government will be requested to review and update the information provided in its last report and to reply to any comments regarding the application of the Convention which have been addressed to your Government by the Committee of Experts on the Application of Conventions and Recommendations or by the Conference Committee on the Application of Standards.

COMPLIANCE WITH OBLIGATIONS UNDER ARTICLE 23, PARAGRAPH 2, £ OF THE ILO CONSTITUTION

Please indicate in the box below the representative organizations of employers and workers to which copies of the present report have been communicated in accordance with article 23, paragraph 2, of the Constitution of the International Labour Organisation.²² If copies of the report have not been communicated to representative organizations of employers and/or workers, or if they have been communicated to bodies other than such organizations, please supply information on any particular circumstances existing in your country, which explains the procedure followed.

Organizations to which copies of the report have been communicated:

Please indicate whether you have received from representative organizations of employers or workers any observations, either of a general kind or in connection with the present or the previous report, regarding the practical application of the provisions of the Convention or the application of the legislation or other measures implementing the Convention. If so, please communicate a copy of the observations received, together with any comments that you consider useful.

Observations received, if any:

The observations of SAK and STTK are based on the perspective of workers' organizations and concern, in particular, how the obligations under Convention No. 190 are fulfilled in the everyday reality of workers and how rights, supervision and remedies are effectively accessible in practice.

The central assessment of SAK and STTK is that Finnish legislation provides a formal basis for giving effect to Convention No. 190, but that there are serious shortcomings in its application in practice. The Finnish legal system contains several statutes through which violence and harassment in the world of work, inappropriate treatment, discrimination and labour exploitation can be prevented and addressed. Particularly relevant are the Occupational Safety and Health Act, the Employment Contracts Act, the Non-discrimination Act, the Act on Equality between Women and Men, the Criminal Code, the Occupational Health Care Act and the provisions on occupational safety and health enforcement. SAK and STTK considered that there were no legislative obstacles in Finland to the ratification of Convention No. 190.

SAK and STTK regard Finland's ratification as an important step towards the elimination of violence and harassment in the world of work. Convention No. 190 entered into force for Finland on 7 June 2025. However, the effective application of Convention No. 190 in practice cannot be based solely on the fact that national legislation formally contains provisions relating to the matter. Convention No. 190 requires procedures that function in practice, effective supervision, accessible remedies, protection against retaliation and opportunities for workers to participate.

In the assessment of SAK and STTK, the most significant shortcomings relate specifically to the effective enjoyment of the rights guaranteed by Convention No. 190. A worker's possibility of obtaining protection often depends on whether the worker recognizes their situation as legally relevant, whether they dare to report the matter, whether they know which authority or body to turn to, and whether they are able to bear the burden and financial risk of a lengthy process. This is particularly problematic for workers in vulnerable situations, such as migrant workers, posted workers, temporary agency workers, part-time workers, young workers, workers in precarious employment relationships and workers in low-paid and subcontracting-intensive sectors.

Labour exploitation, underpayment, threats, intimidation, dependency on the employer, fear relating to residence permits or livelihood, and lack of information may create situations in which the worker is not in fact able to exercise their rights. These phenomena are materially connected with the scope of Convention No. 190, because the Convention's definition of violence and harassment also covers behaviours and practices that cause or are likely to cause physical, psychological, sexual or economic harm.

²² Article 23, paragraph 2, of the Constitution reads as follows: "Each Member shall communicate to the representative organisations recognised for the purpose of article 3 copies of the information and reports communicated to the Director-General in pursuance of articles 19 and 22."

SAK and STTK further consider that recent developments in the world of work must be taken into account as a cross-cutting issue in the application of Convention No. 190 in practice. Restrictions on the right to take industrial action, the expansion of local bargaining without sufficient safeguards on the workers' side, the easing of cooperation obligations, changes to the conciliation system and weakenings of employment security may increase barriers to reporting and weaken workers' effective ability of exercising their rights. For this reason, strengthening workers' collective protection, occupational safety and health enforcement and readily accessible and effective remedies is necessary for the effective application of Convention No. 190 in practice.

From the perspective of ILO supervision, what is relevant is not only whether reforms formally fall within the scope of Convention No. 190, but also whether, in practice, they weaken workers' possibilities to exercise the rights guaranteed by Convention No. 190 without fear of retaliation.

SAK and STTK consider it essential that Finland monitor the application of Convention No. 190 in practice systematically and on a tripartite basis. In accordance with the established approach of the CEACR and the CFA, the assessment must be based on both law and practice. In monitoring, particular attention must be paid to the resources for enforcement, the coverage of workplace-level procedures, the quality of risk assessments, the accessibility of support services for victims, gender-responsive procedures, the recognition of the effects of domestic violence in the world of work, the prevention of labour exploitation, and the collection and publication of disaggregated statistical data.

Sources: Government Proposal HE 89/2023 vp; Act on the International Labour Organization Convention concerning the elimination of violence and harassment in the world of work 257/2024; Government Decree 1028/2024; Occupational Safety and Health Act 738/2002; Employment Contracts Act 55/2001; Non-discrimination Act 1325/2014; Act on Equality between Women and Men 609/1986; Criminal Code 39/1889; Act on Occupational Safety and Health Enforcement and Cooperation on Occupational Safety and Health at Workplaces 44/2006; HEUNI, From Rights on Paper to Rights in Action, Report Series No. 109, 2024; HEUNI, Nordic Perspectives on Labour Exploitation, Report Series No. 111, 2025; Victim Support Finland, Work-related exploitation; Ministry of Economic Affairs and Employment, Action Plan against Labour Exploitation, 2024.

Comments of your Government on observations received, if any:

I. DEFINITIONS

Article 1 and Article 7. Definitions of violence and harassment in the world of work

1. Article 1(1)(a) provides that the term "violence and harassment" in the world of work refers to a range of unacceptable behaviours and practices, or threats thereof, whether a single occurrence or repeated, that aim at, result in, or are likely to result in physical, psychological, sexual or economic harm, and includes gender-based violence and harassment. Article 1(2) provides that without prejudice to subparagraph (a) of Article 1(1), definitions in national laws and regulations may provide for a single concept or separate concepts. Article 7 requires Members to adopt laws and regulations to define violence and harassment in the world of work, including gender-based violence and harassment.

Please indicate in the box "implementing measures" below the definition(s) of violence and harassment in the world of work, whether as a single concept or separate concepts, and specify the relevant national laws and regulations. Please make sure that all definitions are reproduced in the box below, in particular where they provide for separate concepts as foreseen under Article 1(2).

Implementing measures:

SAK and STTK consider it important to state that, although national regulation constitutes the formal basis for giving effect to Convention No. 190, from the perspective of workers what is decisive is the effective accessibility and effectiveness of that regulation.

Finnish legislation does not contain one general and comprehensive definition, within the meaning of Article 1 of Convention No. 190, of violence and harassment in the world of work. Protection is built upon several separate concepts and regulatory frameworks. This is, as such, possible under Article 1(2) of Convention No. 190, since national laws and regulations may use either a single concept or separate concepts. SAK and STTK nevertheless consider that the fragmented nature of the system may weaken the identification and exercise of rights, particularly where violence, harassment, discrimination, inappropriate treatment, psychosocial workload and labour exploitation overlap.

Section 8 of the Occupational Safety and Health Act provides for the employer's general duty of care. The employer shall take the necessary measures to ensure the safety and health of workers at work. Section 10 of the Occupational Safety and Health Act obliges the employer to identify and assess the hazards of the work. Section 27 of the Occupational Safety and Health Act concerns the threat of violence, and section 28 obliges the employer to take action if harassment or other inappropriate treatment causing harm or danger to the worker's health occurs at work. These provisions constitute the central basis for preventing violence and harassment within the meaning of Convention No. 190 at workplaces.

Under the Non-discrimination Act, harassment constitutes prohibited discrimination where the dignity of a person or a group of persons is intentionally or in fact violated on a prohibited ground of discrimination referred to in the Act in such a way that an intimidating, hostile, degrading, humiliating or offensive environment is created. Section 7 of the Act on Equality between Women and Men defines sexual harassment and gender-based harassment as prohibited discrimination. Under section 8 d of the Act on Equality between Women and Men, the employer's conduct is deemed to constitute prohibited discrimination if, after becoming aware of harassment, the employer neglects the measures available to eliminate the harassment. The

provisions of the Criminal Code supplement protection in serious cases of violence, threats, sexual offences, discrimination and exploitation.

SAK and STTK consider that national regulation substantively covers many of the situations required by Convention No. 190. A shortcoming, however, is that workers are not always provided with a clear, coherent and easily accessible procedure for determining whether the matter concerns harassment under the Occupational Safety and Health Act, harassment under the Act on Equality between Women and Men or the Non-discrimination Act, a criminal offence, labour exploitation, or a combination of these. The effective application of Convention No. 190 in practice requires these different avenues of legal protection to be better coordinated.

Sources: Occupational Safety and Health Act 738/2002, sections 8, 10, 27 and 28; Non-discrimination Act 1325/2014, sections 8 and 14; Act on Equality between Women and Men 609/1986, sections 7 and 8 d; Criminal Code 39/1889; Government Proposal HE 89/2023 vp; Occupational Safety and Health Administration, Supervision of harassment and other inappropriate treatment, Occupational Safety and Health Enforcement Guidelines 1/2023; Finnish Institute of Occupational Health, Guide to the application of the Occupational Safety and Health Act.

2. Article 1(1)(b) provides that the term “gender-based violence and harassment” means violence and harassment directed at persons because of their sex or gender, or affecting persons of a particular sex or gender disproportionately, and includes sexual harassment. Article 1(2) provides that without prejudice to subparagraph (b) of Article 1(1), definitions in national laws and regulations may provide for a single concept or separate concepts.

Please indicate in the box “implementing measures” below the definition(s) of gender-based violence and harassment in the world of work, whether as a single concept or separate concepts, and specify the relevant national laws and regulations. Please make sure that all definitions are reproduced in the box below, in particular where they provide for separate concepts as foreseen under Article 1(2).

Implementing measures:

Gender-based harassment and sexual harassment are regulated in Finland in particular in the Act on Equality between Women and Men. Under section 7 of the Act on Equality between Women and Men, sexual harassment means verbal, non-verbal or physical unwanted conduct of a sexual nature by which a person's psychological or physical integrity is intentionally or in fact violated, in particular by creating an intimidating, hostile, degrading, humiliating or distressing environment. Gender-based harassment means unwanted non-sexual conduct related to a person's gender, gender identity or gender expression by which a person's psychological or physical integrity is intentionally or in fact violated and an intimidating, hostile, degrading, humiliating or distressing environment is created.

Section 8 d of the Act on Equality between Women and Men confirms the employer's responsibility to take action in cases of harassment. The employer's conduct is considered to constitute prohibited discrimination if, after becoming aware that a worker has been subjected at work to sexual harassment or gender-based harassment, the employer neglects to take the measures available to eliminate the harassment. This corresponds in its essential respects to the requirement under Convention No. 190 to recognize gender-based violence and harassment.

SAK and STTK consider that the regulation is substantively strong, but that shortcomings remain in its practical application. Reporting sexual and gender-based harassment is often associated with fear, shame, uncertainty, the risk of retaliation and concern about being stigmatized in the workplace community. The effectiveness of legal protection is also weakened by the length of proceedings, the risk of litigation costs and the fact that workplaces do not always have clear, confidential and victim-supporting procedures. From the perspective of Convention No. 190, it is necessary that gender-responsive procedures, training for supervisors, the role of workers' representatives and readily accessible and effective remedies be strengthened in practice.

Sources: Act on Equality between Women and Men 609/1986, sections 7 and 8 d; Government Proposal HE 89/2023 vp; Ombudsman for Equality, Sexual and gender-based harassment; Ombudsman for Equality, 5 June 2024, Sexual and gender-based harassment: the employer has a broad duty to act; Report of the Ombudsman for Equality to Parliament 2022, K 1/2022 vp.

II. SCOPE

Article 2. Persons protected and sectors covered

1. Please indicate in the box “implementing measures” below whether the national laws and regulations, collective agreements or other measures that prevent, address and eliminate violence and harassment in the world of work, protect workers and other persons in the world of work, including:

(a) employees;

☒ Yes

☐ No

- | | | |
|--|------------------------------|-----------------------------|
| (b) other persons working irrespective of their contractual status; | ☐ Yes | ☐ No |
| (c) persons in training (including interns and apprentices); | ☐ Yes | ☐ No |
| (d) workers whose employment has been terminated; | ☐ Yes | ☐ No |
| (e) volunteers; | ☐ Yes | ☐ No |
| (f) job seekers and job applicants; | ☐ Yes | ☐ No |
| (g) individuals exercising the authority, duties or responsibilities of an employer. | ☐ Yes | ☐ No |

Please specify any categories of persons excluded.

Please also specify the relevant provisions of the laws, regulations, collective agreements or other measures.

Implementing measures:

Finnish legislation broadly protects persons working in an employment relationship and in a public-service employment relationship. The Occupational Safety and Health Act applies to work performed on the basis of an employment contract as well as to work performed in a public-service employment relationship or a comparable public-law service relationship. The scope of application of the Occupational Safety and Health Act also covers temporary agency work in such a way that the user undertaking must comply with the occupational safety and health obligations incumbent on the employer insofar as it exercises the right to direct and supervise the work. The employer's general duty of care, the duty to identify and assess hazards, the regulation concerning the threat of violence and the duty to take action in cases of harassment and other inappropriate treatment constitute the central basis for the protection of workers.

The Non-discrimination Act and the Act on Equality between Women and Men supplement protection, in particular with regard to discrimination, harassment, sexual harassment and gender-based harassment. Under the Non-discrimination Act, the concept of employer is also equated with the user undertaking and with the organiser of practical training or other comparable activity insofar as they exercise managerial or supervisory authority. This is important from the perspective of Article 2 of Convention No. 190, because the Convention is not limited only to workers in a traditional employment relationship, but more broadly covers persons in the world of work.

SAK and STTK consider that national regulation secures the protection required under Article 2 of Convention No. 190 most clearly in employment relationships, public-service employment relationships, temporary agency work, traineeships and job-seeking situations. By contrast, there are uncertainties in the effective protection in practice in situations involving work outside an employment relationship, platform-mediated work, work performed in the form of self-employment and voluntary work. It is precisely in these forms of work that the risk of violence, harassment, pressure, economic exploitation and retaliation may be high, while the worker's or person performing work's ability to rely on labour-law protection is more uncertain.

Protection after the termination of the employment relationship is also partial. The employer obligations under the Occupational Safety and Health Act are primarily linked to working conditions prevailing during the work. By contrast, the prohibitions of discrimination and retaliation under the Act on Equality between Women and Men and the Non-discrimination Act, the protection against termination under the Employment Contracts Act, the regulation concerning the processing of personal data, and criminal-law protection may apply also in connection with, or after, the termination of the employment relationship. From the perspective of Convention No. 190, it is important that a worker is not left without protection in situations where harassment, threats, defamation, retaliation or pressure connected with the exercise of rights continue after the termination of the employment relationship.

SAK and STTK consider it important that Finland clarify, in the application of Convention No. 190 in practice, in particular the position of persons who work without a traditional employment relationship or whose employment status is unclear. In platform work, subcontracting chains, seasonal work, domestic work, posted work and situations of the grey economy, formal legal status must not result in a person being left without protection against violence and harassment in the world of work. The purpose of Convention No. 190 is to protect persons in the world of work in reality, not only those whose status is unproblematic under national law.

Recent developments in the world of work underline the need to ensure that clear reporting channels, readily accessible advice, protection against retaliation and the effective accessibility of enforcement authorities are available also in atypical and weakly protected forms of work.

SAK and STTK further consider that the coverage of protection must be assessed intersectionally. Migrant workers, posted workers, young workers, workers with disabilities, workers belonging to gender minorities, part-time workers, fixed-term workers and temporary agency workers, as well as workers whose residence or livelihood status is dependent on the employer, may be particularly exposed to violence, harassment, exploitation and retaliation. The protection of these groups must not be left to the individual worker's own capacity to act, but requires proactive enforcement, multilingual information and a strong role for workers' representatives.

Sources: Occupational Safety and Health Act 738/2002, sections 2, 3, 8, 10, 27 and 28; Employment Contracts Act 55/2001; Non-discrimination Act 1325/2014, in particular sections 4, 8, 14 and 16; Act on Equality between Women and Men 609/1986, in particular sections 7 and 8 d; Criminal Code 39/1889; Act on the Protection of Privacy in Working Life 759/2004; Government Proposal HE 89/2023 vp; HEUNI, From Rights on Paper to Rights in Action, Report Series No. 109, 2024; HEUNI, Nordic Perspectives on Labour Exploitation, Report Series No. 111, 2025; Victim Support Finland, Work-related exploitation; Ministry of Economic Affairs and Employment, Action Plan against Labour Exploitation, 2024.

2. Please indicate in the box “implementing measures” below how the national laws and regulations, collective agreements or other measures that address violence and harassment in the world of work, cover all sectors, whether private or public, both in the formal and informal economy, and whether in urban or rural areas.

Please specify any exclusions related to Article 2(2).

Please also specify the relevant provisions of the laws, regulations, collective agreements or other measures.

Implementing measures:

The central regulation concerning violence and harassment in the world of work in Finland applies, as a starting point, to both the private and the public sector. The Occupational Safety and Health Act applies broadly to work performed in an employment relationship and in a public-service employment relationship. The Non-discrimination Act, the Act on Equality between Women and Men, the Employment Contracts Act and the Criminal Code apply, as a starting point, across different sectors and in both urban and rural areas. The regulation is not formally limited to certain sectors, but aims to secure workers’ safety, health, equality and non-discrimination throughout the world of work.

SAK and STTK consider, however, that formal scope of application alone is not sufficient to guarantee the full realization of Convention No. 190. In practice, there are significant differences in protection between sectors, forms of work and groups of workers. Particular risks are linked to sectors where work is low-paid, subcontracting chains are long, labour turnover is high, workers work alone or on customers’ premises, or the worker’s bargaining position is weak. Such sectors may include, for example, cleaning, the restaurant and accommodation sector, construction, transport, warehouse work, agricultural and seasonal work, care and social services, domestic work, platform work and various service sectors.

In situations of the grey economy, the realization of Convention No. 190 is particularly challenging. The worker may not have a written employment contract, wages may be paid partly or wholly informally, working time may not be recorded, the actual responsible employer may be unclear, or the worker may fear the consequences of reporting for their right of residence, livelihood or future employment opportunities. In such situations, violence, threats, intimidation, economic exploitation and harassment may remain hidden from the authorities.

SAK and STTK consider that the requirement in Article 2(2) of Convention No. 190 that the Convention apply also in the informal economy requires Finland to adopt more proactive and risk-based enforcement than at present. In practice, protection should not depend on whether an individual worker is able personally to identify the correct authority, collect evidence and pursue the matter. Cooperation between authorities, such as the occupational safety and health authorities, the police, the Finnish Immigration Service, the Tax Administration, the non-discrimination and equality authorities and victim support services, must be strengthened. In addition, multilingual advice, accessible and safe reporting mechanisms and information on workers’ rights are needed at workplaces and in sectors where the risk of exploitation is high.

SAK and STTK consider it important that the application of Convention No. 190 in practice is not confined to stating the formal coverage of national regulation, but assesses whether protection in fact reaches those workers who are at greatest risk of becoming subject to violence, harassment or exploitation. This also requires the systematic use of statistical data and findings from enforcement authorities, as well as consultation of workers’ and employers’ organizations in identifying high-risk sectors.

Sources: Occupational Safety and Health Act 738/2002; Non-discrimination Act 1325/2014; Act on Equality between Women and Men 609/1986; Employment Contracts Act 55/2001; Criminal Code 39/1889; Act on Occupational Safety and Health Enforcement and Cooperation on Occupational Safety and Health at Workplaces 44/2006; Government Proposal HE 89/2023 vp; HEUNI, From Rights on Paper to Rights in Action, Report Series No. 109, 2024; HEUNI, Nordic Perspectives on Labour Exploitation, Report Series No. 111, 2025; Victim Support Finland, Work-related exploitation; Occupational Safety and Health Administration, Work-related exploitation; Ministry of Economic Affairs and Employment, Action Plan against Labour Exploitation, 2024.

Article 3. Territorial scope

Please indicate in the box “implementing measures” below whether the national laws and regulations, collective agreements or other measures that address violence and harassment in the world of work cover violence and harassment occurring in the course of, linked with or arising out of work:

- | | | |
|--|---|-----------------------------|
| (a) in the workplace, including public and private spaces where they are a place of work; | ☒ Yes | ☐ No |
| (b) in places where the worker is paid, takes a rest break or meal, or uses sanitary, washing and changing facilities; | ☒ Yes | ☐ No |
| (c) during work-related trips, travel training, events or social activities; | ☐ Yes | ☐ No |
| (d) through work-related communications, including those enabled by information and communication technologies; | ☒ Yes | ☐ No |
| (e) in employer-provided accommodation; | ☐ Yes | ☐ No |

(f) when commuting to and from work.

☐ Yes

☐ No

Please specify any exclusions related to Article 3.

Please also specify the relevant provisions of the laws, regulations, collective agreements or other measures.

Implementing measures:

The employer's obligations under the Occupational Safety and Health Act cover work and working conditions broadly. The employer must ensure the safety and health of workers at work, identify and assess the hazards of the work, and take the necessary measures to eliminate or reduce hazards. With regard to the threat of violence, the work and working conditions must, as far as possible, be arranged so that the threat of violence and incidents of violence are prevented in advance. With regard to harassment and other inappropriate treatment, the employer has, after becoming aware of the matter, a duty to take the measures available to eliminate the defect.

These obligations clearly cover actual workplaces and places where work is performed. They also apply to such public and private spaces in which work is in fact carried out. For example, in customers' premises, during home visits, in mobile work, on construction sites, in transport work, in care and social services and in other work situations organized by the employer or falling within the employer's sphere of influence, the employer must assess the risks of violence and harassment and take preventive measures.

Work-related break rooms, meal areas, washing and changing facilities and other premises used by workers fall, as a starting point, within the scope of the assessment of the safety of the working environment where they are provided by the employer or fall within the employer's sphere of influence. SAK and STTK consider that workplace safety should not be understood narrowly as covering only the actual place where work is performed. Harassment, threats and inappropriate treatment may also occur during breaks, in changing rooms, in shared facilities and in other situations in which the worker is present because of work.

Work-related trips, training, events and social activities fall within the scope of Convention No. 190 where the violence or harassment occurs in the course of, linked with or arising out of work. Under Finnish national regulation, the employer's responsibility in such situations is determined in particular by the connection of the event with work and by the extent to which the employer has organized the event, directed participation in it or been able to influence the circumstances. SAK and STTK consider that workplaces need clearer instructions than at present for preventing and addressing risks of violence and harassment connected with, for example, Christmas parties, recreational days, training events, work-related travel and client events.

Work-related communications, including email, instant messaging, internal workplace communication channels, remote-work tools and the use of social media in connection with work, fall within the scope of the employer's risk management and duty to intervene. SAK and STTK consider it important that digital harassment be expressly recognized as a form of violence and harassment in the world of work. The employer must assess the risks associated with digital communication, define the limits of acceptable conduct and ensure that workers have safe reporting channels also in cases of harassment occurring through electronic means.

Employer-provided accommodation is a particularly important issue from the perspective of Convention No. 190. In Finland, the employer's responsibility may be clear where the accommodation is provided by the employer, is a condition for the performance of the work, or is closely linked with the work. In practice, risks related to accommodation arise particularly in relation to posted workers, migrant workers, seasonal workers and workers in subcontracting chains. SAK and STTK consider that guidance concerning the safety, privacy, prevention of harassment and reporting channels in employer-provided accommodation should be specified more precisely.

An ordinary commute between home and the workplace does not, in Finnish regulation, fall in all respects within the employer's authority and control. Article 3 of Convention No. 190 nevertheless requires that risks of violence and harassment connected with commuting also be identified where they have a sufficient link with work. Such situations may include, for example, transport arranged by the employer, harassment by a customer or co-worker during the commute, travel at exceptional times or to exceptional places because of work duties, or situations in which the organization of work increases the risk of violence or harassment.

SAK and STTK consider that Finnish regulation largely allows for a broad interpretation in accordance with Article 3 of Convention No. 190, but that there are uncertainties in its application in practice. Workplace risk assessments and guidance should take clearer account than at present of digital harassment, violence and harassment by third parties, commuting, employer-provided accommodation, workplace social situations and work-related customer and service situations. Without such clarification, protection too easily becomes dependent on the activity of the individual worker and on whether the situation is recognized in the correct procedure as work-related violence or harassment.

Sources: Occupational Safety and Health Act 738/2002, in particular sections 8, 10, 27 and 28; Act on Equality between Women and Men 609/1986, sections 7 and 8 d; Non-discrimination Act 1325/2014, sections 14 and 16; Government Proposal HE 89/2023 vp; Occupational Safety and Health Administration, Inappropriate treatment; Occupational Safety and Health Administration, Supervision of harassment and other inappropriate treatment, Occupational Safety and Health Enforcement Guidelines 1/2023; Finnish Institute of Occupational Health, Guide to the application of the Occupational Safety and Health Act; HEUNI, From Rights on Paper to Rights in Action, Report Series No. 109, 2024; Victim Support Finland, Work-related exploitation.

III. APPROACH AND CORE PRINCIPLES TO ADDRESS VIOLENCE AND HARASSMENT IN THE WORLD OF WORK

Article 4(2). Approach for the prevention and elimination of violence and harassment in the world of work

1. Please provide in the box “implementing measures” below a **general overview** of the approach adopted for the prevention and elimination of violence and harassment in the world of work, including information on the legislative, regulatory and policy framework and on enforcement and monitoring, remedies and support, sanctions, education and training, inspection and investigation (Article 4(2)).³

Please specify how this approach:

- is inclusive, integrated and gender-responsive; and
- takes into account violence and harassment involving third parties, where applicable.

Please note that **further details** about the elements of such approach will be asked for throughout the report form.

Implementing measures:

SAK and STTK submit the following assessment as organizations representing workers. The focus of the assessment is on how the national implementation and application of Convention No. 190 in practice safeguard workers' rights, protection for reporting, enforcement and the effective access to remedies.

Finland's approach to the prevention and elimination of violence and harassment in the world of work is based on a framework composed of several laws and systems of public authorities. The key statutes are the Occupational Safety and Health Act, the Non-discrimination Act, the Act on Equality between Women and Men, the Employment Contracts Act, the Criminal Code, the Occupational Health Care Act and the Act on Occupational Safety and Health Enforcement and Cooperation on Occupational Safety and Health at Workplaces. In addition, guidance issued by authorities, occupational health care, workplace-level procedures, collective agreements and the activities of the equality and non-discrimination authorities are relevant.

The Occupational Safety and Health Act constitutes the central preventive framework. The employer's general duty of care, the identification and assessment of hazards, the regulation concerning the threat of violence and the duty to take action in relation to harassment and other inappropriate treatment correspond in many respects to the preventive objectives of Convention No. 190. The Non-discrimination Act and the Act on Equality between Women and Men prohibit harassment related to discrimination as well as sexual harassment and gender-based harassment. The provisions of the Criminal Code supplement protection in serious cases involving violence, threats, sexual offences, discrimination and exploitation. The occupational safety and health authorities have enforcement powers, and the Ombudsman for Equality and the Non-discrimination Ombudsman provide guidance and supervise, within their respective mandates, the regulation concerning discrimination and harassment.

SAK and STTK consider that Finland's regulatory framework formally provides a basis for the application of Convention No. 190. The practical problem, however, is the fragmented nature of the system: situations involving violence, harassment, inappropriate treatment, discrimination and labour exploitation may simultaneously fall within the scope of several laws and the competence of several authorities. From the worker's perspective, this may mean uncertainty as to whom they should contact, which procedure applies to their situation and what remedies are available to them.

Convention No. 190 requires an inclusive, integrated and gender-responsive approach. In the assessment of SAK and STTK, these elements exist within the Finnish system, but they are not implemented with sufficient consistency. Gender-based harassment, sexual harassment, intersectional discrimination, racism, exploitation of migrant workers, the position of workers with disabilities, the vulnerability of young workers and barriers to reporting of workers in precarious employment relationships are not always sufficiently reflected in workplace risk assessments, enforcement by public authorities or the design of remedies.

SAK and STTK emphasize that the integrated approach required under Convention No. 190 presupposes better coordination than at present between occupational safety and health, enforcement of equality and non-discrimination, criminal proceedings, occupational health care, victim support services and workplace-level procedures. Workers should not themselves have to bear responsibility for identifying a complex legal framework and choosing the correct procedural channel. Clearer referral pathways, cooperation between authorities, readily accessible advice and procedures that safeguard the worker's position are needed also where harassment or violence is simultaneously linked, for example, to gender, origin, trade union activity or an insecure residence or employment status.

Violence and harassment involving third parties has been recognized in Finland in particular through the obligations under the Occupational Safety and Health Act concerning the threat of violence and the assessment of work-related hazards. Risks caused by customers, patients, pupils, service users, passengers, contractors and other external parties may fall within the

³ According to Article 4(2), such an approach includes: “(a) prohibiting in law violence and harassment; (b) ensuring that relevant policies address violence and harassment; (c) adopting a comprehensive strategy in order to implement measures to prevent and combat violence and harassment; (d) establishing or strengthening enforcement and monitoring mechanisms; (e) ensuring access to remedies and support for victims; (f) providing for sanctions; developing tools, guidance, education and training, and raising awareness, in accessible formats as appropriate; and (h) ensuring effective means of inspection and investigation of cases of violence and harassment, including through labour inspectorates or other competent bodies.”

employer's duties of prevention and intervention where they are linked to the work and working conditions. SAK and STTK nevertheless consider that harassment and violence caused by third parties are, in practice, still too often underestimated. The risks are particularly significant, for example, in social and health care, education, retail, the restaurant and accommodation sector, transport, security work, customer service, home visits, platform work and lone working.

SAK and STTK consider it important that the application of Convention No. 190 in practice is also examined in the light of recent regulatory developments in working life. From the perspective of Article 4, it is essential that the national approach must not remain merely formal, but must safeguard workers' participation, collective protection, functioning reporting channels and protection against retaliation also in situations where power relations in working life change in a manner that is more disadvantageous for workers.

SAK and STTK regret that Finland has not succeeded sufficiently in preventing sexual harassment in working life in particular. According to the national Gender Equality Barometer (2025), almost half of women and more than one third of men have experienced sexual harassment. In one in four cases, the harasser was a co-worker. Sexual harassment is a structural problem that significantly undermines well-being at work and equality in Finnish working life.

The EU-funded EU Gender-based Violence Survey (2024) examined sexual harassment from the perspective of working life. Compared with other European countries, the statistics on sexual harassment in Finnish working life make grim reading: as many as 54 per cent of Finnish women who responded to the survey had experienced sexual harassment during their working life. This figure is the second highest in Europe.

SAK and STTK consider that Finland has not taken sufficiently effective measures to eradicate sexual harassment from the labour market in particular.

SAK and STTK consider that, in applying Convention No. 190 in practice, Finland should strengthen in particular the following areas:

- the resources of occupational safety and health enforcement and proactive enforcement;
- workplace-level procedures against violence and harassment;
- gender-responsive procedures that recognize intersectional discrimination;
- multilingual and accessible guidance;
- the position of workers' representatives and occupational safety and health representatives;
- accessible and safe reporting and support mechanisms;
- protection against retaliation;
- legal aid and psychosocial support for victims;
- the recognition of the connection between labour exploitation and harassment;
- the collection and publication of statistical data disaggregated by forms of violence and harassment, sector, gender and vulnerable groups.

In the view of SAK and STTK, Finland's approach has a legal basis, but its effectiveness in practice requires stronger coordination, enforcement and a worker-centred orientation. The objective of Convention No. 190 is not merely the existence of individual provisions, but the realization of rights both in law and in practice, so that everyone has an effective right to a world of work free from violence and harassment.

SAK and STTK emphasize that, although Finland's regulatory framework is in many respects adequate, there is a particular need for more effective statutory enforcement and more effective sanctions for employers who violate the law.

The Ministry of Social Affairs and Health has launched a campaign against sexual harassment in 2026 and has called on different organizations to commit themselves to its implementation. SAK and STTK regard encouragement of voluntary commitment as a positive measure, but not as a sufficient action by the Finnish State to advance the objectives of Convention No. 190 in the current situation.

The realization of the objectives of Convention No. 190 would require, inter alia, the strengthening of statutory remedies and the increase of sanctions applicable to employer violations.

Sources: Gender Equality Barometer. Publications of the Ministry of Social Affairs and Health 2025:11. EU Gender-based Violence Survey 2024. Government Proposal HE 89/2023 vp; Occupational Safety and Health Act 738/2002, in particular sections 8, 10, 25, 27 and 28; Non-discrimination Act 1325/2014, in particular sections 8, 14 and 16; Act on Equality between Women and Men 609/1986, in particular sections 7 and 8 d; Employment Contracts Act 55/2001; Criminal Code 39/1889; Occupational Health Care Act 1383/2001; Act on Occupational Safety and Health Enforcement and Cooperation on Occupational Safety and Health at Workplaces 44/2006; Occupational Safety and Health Administration, Supervision of harassment and other inappropriate treatment, Occupational Safety and Health Enforcement Guidelines 1/2023; Ombudsman for Equality, Sexual and gender-based harassment; Non-Discrimination Ombudsman, Harassment; HEUNI, From Rights on Paper to Rights in Action, Report Series No. 109, 2024; HEUNI, Nordic Perspectives on Labour Exploitation, Report Series No. 111, 2025; Ministry of Economic Affairs and Employment, Action Plan against Labour Exploitation, 2024.

2. Please specify whether the representative employers' and workers' organizations have been consulted regarding the approach for the prevention and elimination of violence and harassment in the world of work (Article 4(2)): ☒ Yes ☐ No

If yes, please provide information on the consultation process in the box "implementing measures" below.

Implementing measures:

The ratification of Convention No. 190 was prepared in Finland on a tripartite basis. In the preparation concerning the approval and bringing into force of Convention No. 190, labour market organizations and other key stakeholders were consulted. On the basis of Government Proposal HE 89/2023 vp, the preparation assessed the relationship between Finland's national legislation and the obligations under Convention No. 190 and Recommendation No. 206, as well as whether ratification required amendments to national legislation. SAK and STTK considered that there were no legislative obstacles to ratification in Finland.

SAK and STTK consider tripartite preparation important, but emphasize that the national implementation of Convention No. 190 does not end with ratification. The application of Convention No. 190 in practice broadly concerns structures in the world of work, enforcement, remedies, workplace practices, training, statistics and the position of workers in vulnerable situations. The monitoring and development of these issues require continuous and genuine tripartite consideration.

SAK and STTK consider that the expertise of workers' and employers' organizations should be used in particular in the following matters:

- the development of workplace-level procedures against violence and harassment;
- the identification of high-risk sectors and particularly vulnerable groups of workers;
- the prevention of violence and harassment by third parties,
- combating labour exploitation,
- the development of gender-responsive procedures,
- the recognition of the effects of domestic violence in the world of work,
- the development of statistics and monitoring data.

SAK and STTK consider it essential that the application of Convention No. 190 in practice be assessed regularly in the future through tripartite procedures. Such monitoring must also assess how changes in labour-market regulation affect workers' effective ability to report violence, harassment, discrimination and exploitation and to have recourse to remedies without fear of retaliation.

SAK and STTK emphasize that the participation of workers' representatives must not remain a merely formal consultation. The inclusive approach required by Convention No. 190 presupposes that the views of workers and their organizations genuinely influence the priorities for the application of Convention No. 190 in practice, the guidance issued by public authorities, workplace models and the development of enforcement.

SAK and STTK emphasize that the full and effective implementation of Convention No. 190 would require, in particular, the effective implementation of employers' obligations, such as the establishment of safe reporting channels, and the effective application of sanctions in cases of violations.

Sources: Government Proposal HE 89/2023 vp; Government project STM068:00/2019; ILO Convention No. 190, Article 4; ILO Recommendation No. 206, in particular Paragraphs 4–8 and 23; Act on Occupational Safety and Health Enforcement and Cooperation on Occupational Safety and Health at Workplaces 44/2006; Occupational Safety and Health Act 738/2002.

3. Please indicate in the box "implementing measures" how the approach recognizes the different and complementary roles of government, employers and workers and their respective organizations, taking into account the varying nature and extent of their respective responsibilities (Article 4(3)).

Implementing measures:

In the Finnish system, the State has primary responsibility for the legislative framework, enforcement by public authorities, remedies, sanctions, victim support services and the practical monitoring of the application of Convention No. 190. It is the responsibility of the State to ensure that the norms concerning violence and harassment in the world of work are sufficiently clear, that enforcement authorities have adequate powers and resources, and that workers have effective access to safe and effective remedies.

Under the Occupational Safety and Health Act, the employer has primary responsibility for the safety and health of workers at work. The employer must identify and assess the hazards of the work, prevent the threat of violence, take action in relation to harassment and other inappropriate treatment, provide workers with instruction and guidance, and take measures to eliminate identified shortcomings. The employer's responsibility also extends to psychosocial risk factors and to risks caused by third parties where such risks are linked to the work and working conditions.

Workers have duties under the Occupational Safety and Health Act to comply with the employer's instructions, to take care, by the means available to them, of their own safety and that of others, to avoid harassment and other inappropriate treatment directed at other workers, and to report defects and shortcomings they have observed. These duties cannot, however, be

interpreted as transferring responsibility for preventing violence and harassment to the worker. From the perspective of Convention No. 190, the primary responsibility for safe working conditions rests with the employer and the State.

Workers' representatives, occupational safety and health representatives, shop stewards and trade unions have a central role in identifying risks, supporting workers, developing workplace-level procedures and monitoring the effective enjoyment of rights. They can reduce barriers to reporting for workers and provide assistance in situations where an individual worker does not feel able, or is otherwise unable, to pursue the matter. SAK and STTK emphasize that this role is essential in the application of Convention No. 190 in practice.

SAK and STTK consider that the division of roles functions in practice only if workers' representatives have genuine possibilities to act. This requires sufficient time allocation, rights to information, training, protection against retaliation and an obligation on the employer to address issues concerning violence and harassment genuinely in cooperation. From the perspective of Article 4, the position of employee representation is therefore part of the application of Convention No. 190 in practice, not a separate matter.

SAK and STTK emphasize that the prevention of violence and harassment cannot be based solely on unilateral employer policies, but requires workers and their representatives to have a genuine possibility to influence matters.

SAK and STTK consider that the roles of the State, employers and workers' organizations should be defined more concretely than at present in the application of Convention No. 190 in practice. At workplace level, this means clear responsibilities in risk assessment, reporting procedures, investigation processes, support for victims, training and monitoring. At national level, it means tripartite monitoring, resourcing of enforcement, updating of guidance and assessment of the effects of legislation from the perspective of workers' effective protection in practice.

Sources: Occupational Safety and Health Act 738/2002, in particular sections 8, 10, 14, 18, 19, 27 and 28; Act on Occupational Safety and Health Enforcement and Cooperation on Occupational Safety and Health at Workplaces 44/2006; Government Proposal HE 89/2023 vp; Occupational Safety and Health Administration, Supervision of harassment and other inappropriate treatment, Occupational Safety and Health Enforcement Guidelines 1/2023; ILO Convention No. 190, Article 4; ILO Recommendation No. 206, in particular Paragraphs 7 and 8.

Article 5. Fundamental principles and rights at work

1. *Please indicate in the box "implementing measures" below the actions taken to respect, promote and realize the fundamental principles and rights at work, namely freedom of association and the effective recognition of the right to collective bargaining, the elimination of all forms of forced or compulsory labour, the effective abolition of child labour and the elimination of discrimination in respect of employment and occupation, with a view to preventing and eliminating violence and harassment in the world of work.*

Implementing measures:

Article 5 of Convention No. 190 links the prevention and elimination of violence and harassment in the world of work to the ILO fundamental principles and rights at work. This link is essential: violence and harassment are connected with power relations in the world of work, workers' ability to exercise their rights, to organize, to bargain collectively, to obtain protection against discrimination and to work free from exploitation. SAK and STTK consider that the effective application of Convention No. 190 in practice requires the effective enjoyment of all ILO fundamental principles and rights at work.

Freedom of association and the effective recognition of the right to collective bargaining

In Finland, freedom of association and the freedom to organize professionally are protected under section 13 of the Constitution. Chapter 13, section 1 of the Employment Contracts Act protects the freedom of association of employees and employers and prohibits preventing an employee from belonging to an association or participating in its activities. The right to collective bargaining is further based on the Collective Agreements Act 436/1946, legislation on collective agreements for public officials, and ILO Conventions Nos 87 and 98 ratified by Finland.

SAK and STTK emphasize that freedom of association and the effective recognition of the right to collective bargaining are concrete means, in the context of Convention No. 190, of preventing violence, harassment, discrimination and labour exploitation. Collective agreements, occupational safety and health cooperation, support from shop stewards and occupational safety and health representatives, and workplace-level procedures can reduce barriers to reporting and strengthen workers' protection, particularly in situations where an individual worker does not feel able to defend their rights alone.

SAK and STTK draw attention to the fact that recent reforms in working life have in many respects weakened workers' collective bargaining position and their ability to exercise their rights. Restrictions on the right to take industrial action, the expansion of local bargaining, changes to the conciliation system, the easing of cooperation obligations and weakenings concerning employment security may, taken together, shift power relations in the world of work to the detriment of workers.

These developments are relevant to Article 5 of Convention No. 190 insofar as the prevention and elimination of violence and harassment depend, in practice, on collective structures at workplaces through which workers can raise concerns without fear of losing shifts, termination of employment or other retaliatory measures. The risks may be particularly pronounced in non-unionized, small and low-paid workplaces.

For this reason, in assessing the application of Convention No. 190 in practice, consideration should be given to whether national reforms in working life strengthen or weaken workers' effective ability to exercise their fundamental rights. Formal recognition of freedom of association is not sufficient if regulatory developments reduce workers' collective influence and their capacity to raise concerns safely.

Article 5 of Convention No. 190 requires Members, with a view to preventing and eliminating violence and harassment in the world of work, to respect, promote and realize the fundamental principles and rights at work. Against this background, SAK and STTK consider that developments in national regulation should also be assessed in terms of whether they impair the effective exercise of those rights in practice. This is particularly relevant where changes may increase fear of retaliation or weaken the ability of workers and their representatives to raise issues relating to violence, harassment, discrimination or exploitation.

The elimination of all forms of forced or compulsory labour

The prevention of forced labour, trafficking in persons and labour exploitation in Finland is based on the provisions of the Criminal Code and on regulation concerning minimum terms of employment, the position of foreign workers, occupational safety and health enforcement and assistance to victims. Particularly relevant are Chapter 25, sections 3 and 3a of the Criminal Code concerning trafficking in persons and aggravated trafficking in persons, and Chapter 47, section 3 concerning work discrimination, section 3b concerning extortionate work discrimination and section 3c concerning aggravated extortionate work discrimination. Provisions of the Employment Contracts Act concerning minimum terms of employment, provisions of the Aliens Act concerning the right to work and employer obligations, and regulation concerning occupational safety and health enforcement are also relevant.

SAK and STTK consider that formal criminalization alone is not sufficient to eliminate forced labour, trafficking in persons and labour exploitation. Victims may fear termination of employment, loss of livelihood or residence permit, debt bondage, threats or retaliation. Underpayment, excessive working hours, denial of rest periods, recovery of wages paid, control over the worker and false information about rights may, depending on the circumstances, form part of a broader continuum of coercive, abusive or exploitative practices relevant to the prevention and elimination of violence and harassment in the world of work.

From the perspective of Convention No. 190, practices involving economic exploitation, control and intimidation may cause economic, psychological and physical harm to the worker and, where they meet the terms of Article 1, may fall within the Convention's concept of violence and harassment. SAK and STTK consider it necessary for Finland to strengthen enforcement, victims' access to remedies, multilingual advice, safe reporting mechanisms and the capacity of public authorities to identify exploitation also in situations where the worker does not know how, or does not feel able, to exercise their rights.

Labour mobility, subcontracting chains, seasonal work and the position of migrant workers underline the need to ensure that workers in particularly vulnerable situations receive protection irrespective of whether they themselves are able to initiate proceedings before the competent authorities.

The effective abolition of child labour

The prohibition of child labour and the protection of young workers in Finland are based, inter alia, on the Young Workers' Act 998/1993, the Occupational Safety and Health Act 738/2002, the Compulsory Education Act 1214/2020 and ILO Conventions Nos 138 and 182 ratified by Finland. The Young Workers' Act restricts the work performed by young persons and requires that the work must not be detrimental to the young person's health, development or school attendance. The instruction and guidance required under section 14 of the Occupational Safety and Health Act, as well as the identification and assessment of hazards at work, are particularly important in respect of young workers.

SAK and STTK consider that the prohibition of child labour is well implemented in Finland at the level of legislation. From the perspective of Convention No. 190, however, particular attention must be paid to young workers, trainees, summer workers and persons in apprenticeship training who may be exposed to inappropriate treatment, sexual harassment, pressure or other harassment based on the exercise of power.

Young persons do not always have sufficient information about their rights, workplace procedures or reporting channels. SAK and STTK consider it necessary that young persons be provided with understandable induction on the identification of harassment and violence, employers' obligations and the role of the occupational safety and health representative and the shop steward.

The elimination of discrimination in respect of employment and occupation

The prohibition of discrimination and the promotion of equality in Finland are based on section 6 of the Constitution, the Non-discrimination Act 1325/2014, the Act on Equality between Women and Men 609/1986, Chapter 2, section 2 of the Employment Contracts Act and Chapter 47, section 3 of the Criminal Code. Section 8 of the Non-discrimination Act prohibits discrimination, section 14 prohibits harassment and section 16 prohibits victimization. Section 7 of the Act on Equality between Women and Men defines sexual harassment and gender-based harassment as prohibited discrimination, and section 8 d concerns the employer's responsibility to intervene in harassment.

SAK and STTK consider that the elimination of discrimination in employment and occupation is a central precondition for the effective application of Convention No. 190 in practice. Violence and harassment often affect persons whose position in the labour market is otherwise vulnerable, such as women, migrant and posted workers, persons belonging to ethnic minorities, persons with partial work ability, young workers, older workers, persons belonging to gender and sexual minorities, and part-time, fixed-term and other workers in a position of dependency on the employer.

SAK and STTK emphasize the importance of intersectional discrimination. Harassment may be connected simultaneously, for example, with gender, origin, language, age, disability, trade union activity and an insecure labour-market position. Workplace risk assessments, equality and non-discrimination planning and occupational safety and health enforcement must take these intersecting risks into account more systematically than at present.

SAK and STTK consider that the effects of changes in labour-market regulation must be assessed in particular from the perspective of workers in vulnerable situations. If a worker fears termination of employment, reduction of shifts, non-renewal of a fixed-term contract or other retaliatory measures, reporting harassment and discrimination is easily left undone.

The effective application of Convention No. 190 in practice requires safe and accessible procedures: readily accessible and effective remedies, legal aid, interpretation, enforcement by public authorities, a strong position for workers' representatives, and sanctions that are effective in practice and capable of ensuring compliance.

2. Please indicate in the box “implementing measures” below the actions taken to promote decent work, with a view to preventing and eliminating violence and harassment in the world of work.

Implementing measures:

Promotion of decent work

The promotion of decent work in Finland is based on labour legislation, the collective bargaining system, occupational safety and health enforcement, occupational health care, anti-discrimination regulation and workplace-level procedures. From the perspective of Convention No. 190, decent work requires a safe working environment, adequate livelihood, predictable terms and conditions of employment, the right to organize, collective bargaining power and the worker's effective ability to exercise their rights.

In the view of SAK and STTK, the promotion of decent work requires that reforms in working life be assessed also on the basis of their effects in practice. If reforms narrow workers' protection, collective bargaining power or willingness to report shortcomings, they may also weaken the achievement of the objectives of Convention No. 190.

SAK and STTK consider that the promotion of decent work in the context of Convention No. 190 requires, in particular, strengthening occupational safety and health enforcement, clarifying workplace-level procedures, safeguarding the position of workers' representatives, making the prevention of labour exploitation more effective and ensuring that national labour-market policy does not weaken workers' ability to exercise their fundamental rights.

Sources: Constitution of Finland 731/1999, sections 6 and 13; Employment Contracts Act 55/2001, Chapter 2, section 2 and Chapter 13, section 1; Collective Agreements Act 436/1946; Young Workers' Act 998/1993; Compulsory Education Act 1214/2020; Occupational Safety and Health Act 738/2002, in particular sections 8, 10, 14, 27 and 28; Non-discrimination Act 1325/2014, in particular sections 8, 14 and 16; Act on Equality between Women and Men 609/1986, in particular sections 7 and 8 d; Criminal Code 39/1889, in particular Chapter 25, sections 3 and 3a, and Chapter 47, sections 3, 3b and 3c; Act on Occupational Safety and Health Enforcement and Cooperation on Occupational Safety and Health at Workplaces 44/2006; Government Proposal HE 89/2023 vp; ILO Conventions Nos 29, 87, 98, 100, 105, 111, 138 and 182; HEUNI, From Rights on Paper to Rights in Action, Report Series No. 109, 2024; HEUNI, Nordic Perspectives on Labour Exploitation, Report Series No. 111, 2025; Victim Support Finland, Work-related exploitation; Ministry of Economic Affairs and Employment, Action Plan against Labour Exploitation, 2024.

Article 6. Right to equality and non-discrimination

Please indicate in the box “implementing measures” below the provisions of the laws, regulations and policies ensuring the right to equality and non-discrimination in employment and occupation, including for women workers, as well as for workers and other persons belonging to one or more vulnerable groups or groups in situations of vulnerability that are disproportionately affected by violence and harassment in the world of work.

Implementing measures:

The right to equality and non-discrimination is guaranteed in Finland under section 6 of the Constitution, the Non-discrimination Act and the Act on Equality between Women and Men. The Non-discrimination Act prohibits discrimination on grounds including age, origin, nationality, language, religion, belief, opinion, political activity, trade union activity, family relationships, state of health, disability, sexual orientation and any other personal characteristic. The Act on Equality between Women and Men safeguards protection related to sex, gender identity and gender expression and prohibits sexual harassment and gender-based harassment.

Under section 14 of the Non-discrimination Act, harassment constitutes prohibited discrimination where the dignity of a person or a group of persons is intentionally or in fact violated on a prohibited ground of discrimination referred to in the Act in such a way that a degrading, humiliating, intimidating, hostile or offensive environment is created. Section 7 of the Act on Equality between Women and Men contains the definitions of sexual harassment and gender-based harassment. Under section 8 d of the Act on Equality between Women and Men, the employer's conduct may constitute prohibited discrimination if, after becoming aware of harassment, the employer neglects the measures available to eliminate the harassment.

SAK and STTK consider that national legislation formally provides a strong basis for safeguarding equality and non-discrimination. However, significant shortcomings remain in its application in practice. A worker who has experienced discrimination or harassment often obtains legal protection only if they are able to identify the situation as discrimination, dare to report the matter, are able to obtain evidence and have the ability to bear the financial and psychological burden of the process.

From the perspective of Convention No. 190, it is particularly important to identify groups that are disproportionately exposed to violence and harassment. These include, inter alia, women, migrant workers, posted workers, workers belonging to ethnic or linguistic minorities, workers with disabilities, young workers, workers belonging to gender and sexual minorities, part-time workers, fixed-term workers, temporary agency workers, platform workers and workers whose right of residence, livelihood or labour-market position is dependent on the employer.

SAK and STTK emphasize that vulnerability does not arise from an individual's characteristics, but from labour-market and societal structures. For example, insufficient language skills, dependency on the employer, lack of information, insecure employment, subcontracting chains, workplace hierarchies and fear of retaliation may together create a situation in which the

worker's ability to defend their rights is weak. Convention No. 190 requires that such structural risks be identified and addressed in advance.

In the assessment of SAK and STTK, changes in labour-market regulation may particularly affect the equal protection of workers whose position at the workplace is already insecure. In the application of Convention No. 190 in practice, it is therefore necessary to assess whether such changes increase barriers to reporting or weaken workers' practical ability to exercise their rights without fear of retaliation.

SAK and STTK consider it necessary that the application of equality and non-discrimination regulation in practice be strengthened from the perspective of Convention No. 190. Workplace equality and non-discrimination planning should explicitly address violence, harassment, sexual harassment, gender-based harassment, intersectional discrimination and retaliation. Risk assessments must take into account not only physical and psychosocial risks, but also risks arising from discrimination, the exercise of power, the organization of work, workplace hierarchies and insecure employment relationships. In addition, SAK and STTK note that regulation at decree level specifying the Occupational Safety and Health Act for the prevention of harassment and violence has long been prepared in the Ministry of Social Affairs and Health, but the projects prepared on a tripartite basis have not progressed because of opposition from the employers' side.

SAK and STTK also consider that remedies must be strengthened. Victims of discrimination and harassment must have access to readily accessible advice, legal aid, interpretation, support in obtaining evidence and protection against retaliation. The competence and accessibility of the National Non-Discrimination and Equality Tribunal must be strengthened by reference to whether the current system genuinely provides an effective alternative to burdensome and risky court proceedings. In the view of SAK and STTK, sanctions should be effective in practice, proportionate to the violation and capable of providing a genuine deterrent.

SAK and STTK consider that the application of Article 6 of Convention No. 190 in practice requires Finland to commit more strongly than at present to the effective realization of equality in working life. This means not only prohibiting discrimination in law, but also ensuring that those workers who are at greatest risk of becoming subject to violence and harassment are in fact able to exercise their rights safely.

Sources: Constitution of Finland 731/1999, section 6; Non-discrimination Act 1325/2014, in particular sections 5, 7, 8, 14 and 16; Act on Equality between Women and Men 609/1986, in particular sections 6 a, 6 c, 7 and 8 d; Employment Contracts Act 55/2001, Chapter 2, section 2; Criminal Code 39/1889, Chapter 47, section 3; Government Proposal HE 89/2023 vp; Report of the Non-Discrimination Ombudsman to Parliament 2026, K 2/2026 vp; Report of the Ombudsman for Equality to Parliament 2022, K 1/2022 vp; Ombudsman for Equality, 5 June 2024, Sexual and gender-based harassment: the employer has a broad duty to act; HEUNI, From Rights on Paper to Rights in Action, Report Series No. 109, 2024; Victim Support Finland, Work-related exploitation.

IV. PROTECTION AND PREVENTION

Article 7. Prohibition of violence and harassment in the world of work

Please indicate in the box "implementing measures" below the laws and regulations that prohibit violence and harassment in the world of work, including gender-based violence and harassment. Please specify the relevant provisions of these laws and regulations, including where separate definitions are provided for as foreseen in Article 1(2).

Implementing measures:

In Finland, violence and harassment in the world of work are not prohibited in one general act concerning violence and harassment in working life. The prohibition and the related obligations are based on several different provisions. This is, as a starting point, possible from the perspective of Convention No. 190, since the Convention does not require one general national act, but it does require that violence and harassment in the world of work, including gender-based violence and harassment, be effectively defined and prohibited.

Under section 8 of the Occupational Safety and Health Act, the employer shall ensure the safety and health of workers at work. Section 10 of the Occupational Safety and Health Act obliges the employer to identify and assess the hazards of the work. Section 27 of the Occupational Safety and Health Act concerns the threat of violence and requires that work and working conditions be arranged, as far as possible, so that the threat of violence and incidents of violence are prevented in advance. Section 28 of the Occupational Safety and Health Act, in turn, requires the employer to take action if harassment or other inappropriate treatment causing harm or danger to the worker's health occurs at work.

The Non-discrimination Act and the Act on Equality between Women and Men prohibit harassment based on discrimination. Under section 14 of the Non-discrimination Act, harassment constitutes prohibited discrimination where the dignity of a person or a group of persons is violated on a prohibited ground of discrimination referred to in the Act in such a way that a degrading, humiliating, intimidating, hostile or offensive environment is created. Section 7 of the Act on Equality between Women and Men defines sexual harassment and gender-based harassment as prohibited discrimination. Section 8 d of the Act on Equality between Women and Men provides for the employer's responsibility to take action to eliminate harassment after becoming aware of it.

The provisions of the Criminal Code supplement protection in serious cases involving violence, threats, sexual offences, discrimination and exploitation. Relevant provisions may include, for example, those concerning assault, unlawful threats, sexual offences, work discrimination, extortionate work discrimination, aggravated extortionate work discrimination, trafficking in persons and aggravated trafficking in persons. Criminal-law protection is an important part of the system, but it covers only

the most serious cases or cases fulfilling the statutory elements of an offence and does not replace the employer's preventive and workplace-level obligations.

SAK and STTK consider that Finnish regulation contains, in substantive terms, a broad prohibition of violence and harassment in the world of work. A shortcoming, however, is the fragmented nature of the system. From the worker's perspective, it is not always clear whether the matter concerns harassment or inappropriate treatment under the Occupational Safety and Health Act, harassment under the Non-discrimination Act or the Act on Equality between Women and Men, a criminal offence, labour exploitation, or a combination of these. This may make reporting more difficult and hinder the identification of the correct procedural channel.

SAK and STTK consider it important that, in the application of Convention No. 190 in practice, the prohibition of violence and harassment be made more visible and practical at workplaces. Workers must know what is regarded as prohibited violence, harassment, sexual harassment, gender-based harassment, inappropriate treatment and retaliation. Workplaces need clear reporting channels, defined responsibilities, timetables for handling matters and procedures for protecting the victim.

SAK and STTK further consider that the prohibition must also be assessed from the perspective of the changing structures of the world of work. Platform work, subcontracting chains, forms of work outside an employment relationship, remote work, digital communication and employer-provided accommodation may create situations in which the prohibition of violence and harassment is not realized in practice as clearly as in a traditional workplace environment. The effective application of Convention No. 190 in practice requires that workers and other persons in the world of work also have effective protection in these situations.

The prohibition is effective only if the worker can exercise their rights without fear of retaliation, loss of livelihood or termination of employment. For this reason, in the application of Convention No. 190 in practice, attention must also be paid to the effects of general developments in working life on workers' barriers to reporting.

Sources: Occupational Safety and Health Act 738/2002, sections 8, 10, 27 and 28; Non-discrimination Act 1325/2014, sections 8, 14 and 16; Act on Equality between Women and Men 609/1986, sections 7 and 8 d; Criminal Code 39/1889, in particular Chapters 20, 21, 25 and 47; Employment Contracts Act 55/2001; Government Proposal HE 89/2023 vp; Occupational Safety and Health Administration, Supervision of harassment and other inappropriate treatment, Occupational Safety and Health Enforcement Guidelines 1/2023; Ombudsman for Equality, Sexual and gender-based harassment; Non-Discrimination Ombudsman, Harassment.

Article 8. Appropriate measures of prevention

Please indicate in the box "implementing measures" below (specifying the relevant provisions of the laws, regulations, collective agreements or other measures):

Implementing measures:

The appropriate measures taken to prevent violence and harassment in the world of work

In Finland, the prevention of violence and harassment in the world of work is based in particular on the preventive structure of the Occupational Safety and Health Act. The employer's general duty of care, the identification and assessment of hazards, instruction and guidance for workers, the regulation concerning the threat of violence and the duty to take action in relation to harassment and other inappropriate treatment constitute the central basis for preventive measures. The assessment of hazards under section 10 of the Occupational Safety and Health Act must also take into account psychosocial workload factors, the threat of violence, harassment, inappropriate treatment and risks related to the organization of work.

The Act on Equality between Women and Men and the Non-discrimination Act supplement this framework by requiring employers to promote equality and non-discrimination and to prevent discrimination and harassment. Workplace equality and non-discrimination planning can play an important role in identifying sexual and gender-based harassment, discrimination and intersecting risks. Occupational health care, occupational safety and health cooperation and workers' representatives have an important role in identifying risks and developing preventive measures.

SAK and STTK consider that Finnish regulation provides a sound legal basis for the prevention of violence and harassment, but that implementation in practice is uneven. Workplace risk assessments often remain too general and do not always identify harassment, sexual harassment, digital harassment, violence caused by third parties, labour exploitation or risks of intersectional discrimination. Particularly in small workplaces, subcontracting chains, low-paid sectors and atypical forms of work, written procedures may be deficient or unknown to workers.

SAK and STTK consider it important that prevention not be understood merely as the employer's ex post intervention in an individual case of harassment. Convention No. 190 requires a proactive and systematic approach. This means that workplaces must identify risks of violence and harassment in advance, assess the organization of work, the exercise of power, customer situations, lone working, night work, digital communication, accommodation arrangements, language and cultural factors and the impact of insecure employment relationships on barriers to reporting.

Recognition of the role of public authorities in the case of informal economy workers

The Finnish labour-law system is based primarily on the regulation of work performed in an employment relationship. However, in situations involving persons working outside an employment relationship and in the informal economy, workers may remain outside formal employment protection or their employment relationship may be difficult to prove. Article 8 of Convention No. 190 requires that the role of public authorities be recognized in particular in protecting such workers.

SAK and STTK consider that an active role for public authorities is indispensable, because barriers to reporting of workers outside an employment relationship is often high. Workers may fear losing work, jeopardizing their residence permit, the consequences of debt-related dependency, retaliation by the employer, or that the public authority will not recognize their

status as a worker. In such situations, violence, threats, intimidation, control, underpayment and other exploitation may remain hidden.

Cooperation between the occupational safety and health authorities, the police, the Finnish Immigration Service, the Tax Administration, victim support services and other actors must be strengthened. Enforcement must be risk-based and proactive and must not rely excessively on the individual worker's ability to make a report. SAK and STTK consider it important that the legal position of victims of exploitation be strengthened and that reporting be safe also where the worker's residence or livelihood has been dependent on the employer.

Identification of sectors, occupations and work arrangements more exposed to violence and harassment

In Finland, high-risk sectors and situations include, inter alia, social and health services, education, public customer services, retail, the restaurant and accommodation sector, cleaning, construction, transport, security work, night work, lone working, work performed at home or on customers' premises, platform work, seasonal work and work in subcontracting chains. In addition, migrant workers, posted workers, young workers, temporary agency workers, part-time workers, fixed-term workers and other workers in an insecure labour-market position may be particularly exposed to violence and harassment.

SAK and STTK consider that high-risk sectors must be identified systematically and on a tripartite basis. The experiential knowledge of workers and their representatives is essential in this regard. Statistics, findings from enforcement by public authorities, occupational health care data, staff surveys and research evidence are important, but they are not sufficient on their own if workers do not feel able to report their experiences. The large number of unreported cases must also be taken into account in identifying high-risk sectors.

SAK and STTK consider it a shortcoming that Finland does not have sufficiently comprehensive, comparable and regularly published statistics on the different forms of violence and harassment in the world of work. From the perspective of Convention No. 190 and Recommendation No. 206, SAK and STTK consider it necessary that Finland demonstrate in its subsequent reports that it collects and publishes data at least on inspections, reports made by workers, guidance and instructions issued to employers, orders, reports of offences, decisions of courts and boards, sanctions imposed and actually enforced, and compensation, remedies and support measures granted. The data should, where possible, be disaggregated by form of violence and harassment, sector, gender, age, form of work, origin, disability and other vulnerable status. Without such an evidence base, it is not possible to assess reliably how Convention No. 190 is applied in practice.

Effective protection of informal economy workers and workers in high-risk sectors

Effective protection requires measures both at workplace level and at the level of public authorities. Workplaces must have clear written procedures for preventing, reporting, investigating and addressing violence and harassment and for supporting the victim. Risk assessments must be concrete and must lead to practical measures. Workers must be provided with information in a language they understand, and instructions must also be accessible to those who are not in permanent or full-time employment.

SAK and STTK consider that protection is weakest precisely in those sectors and forms of work where the risk is greatest. This concerns in particular subcontracting chains, the informal economy, platform work, seasonal work, the position of migrant workers and workers dependent on the employer. In these situations, proactive enforcement, strengthening the responsibility of contractors, multilingual advice, access for workers' representatives to workplaces and the ability of public authorities to intervene in shortcomings without the individual worker bearing the risk of the entire process are needed.

From the perspective of the application of Convention No. 190 in practice, this underlines the need to strengthen the prohibition of retaliation, enforcement by public authorities and accessible support mechanisms, particularly in forms of work where the worker's position is weak.

Sources: Occupational Safety and Health Act 738/2002, sections 8, 10, 14, 25, 27 and 28; Non-discrimination Act 1325/2014, sections 5, 7, 14 and 16; Act on Equality between Women and Men 609/1986, sections 6 a, 6 c, 7 and 8 d; Occupational Health Care Act 1383/2001; Act on Occupational Safety and Health Enforcement and Cooperation on Occupational Safety and Health at Workplaces 44/2006; Government Proposal HE 89/2023 vp; ILO Recommendation No. 206, in particular Paragraphs 8–13 and 23; HEUNI, From Rights on Paper to Rights in Action, Report Series No. 109, 2024; HEUNI, Nordic Perspectives on Labour Exploitation, Report Series No. 111, 2025; Victim Support Finland, Work-related exploitation; Occupational Safety and Health Administration, Work-related exploitation; Ministry of Economic Affairs and Employment, Action Plan against Labour Exploitation, 2024.

Article 9. Responsibilities of employers

Please indicate in the box "implementing measures" below:

Implementing measures:

Laws and regulations requiring employers to take appropriate steps to prevent violence and harassment

The Occupational Safety and Health Act requires the employer to ensure the safety and health of workers at work. The employer must take into account factors relating to the work, the working conditions, the other working environment and the worker's personal capacities insofar as they affect safety and health at work. The employer must identify and assess the hazards of the work, provide workers with adequate instruction and guidance, prevent the threat of violence and intervene in harassment and other inappropriate treatment.

Sections 8, 10, 14, 27 and 28 of the Occupational Safety and Health Act constitute the central legal basis for the employer's obligations from the perspective of Article 9 of Convention No. 190. In addition, the Non-discrimination Act and the Act on Equality between Women and Men impose obligations on the employer to prevent discrimination and harassment and to promote equality and non-discrimination. The Occupational Health Care Act supports the employer's obligation to prevent health hazards arising from work, including psychosocial workload factors.

SAK and STTK consider that national regulation contains several obligations for employers to prevent violence and harassment, but regard the regulation as insufficient in terms of precision and application in practice. In Finland, regulation at decree level specifying the Occupational Safety and Health Act has long been prepared under the leadership of the Ministry of Social Affairs and Health in order to prevent harassment, violence and psychosocial workload factors. In the view of SAK and STTK, the progress of the regulation has stalled because of opposition from the employers' side, although the need for clearer employer obligations has been recognized.

In addition, SAK and STTK consider that the shortcomings relate above all to practical implementation and to the precision of the obligations. There are major differences between workplaces in how risks are assessed, how harassment is addressed, how workers are trained and how victims are supported. Particularly in small workplaces, non-unionized workplaces, subcontracting chains and insecure employment relationships, the worker's ability to obtain protection may be weak.

Workplace policy on violence and harassment

Article 9 of Convention No. 190 requires employers to be required, so far as is reasonably practicable, to adopt and implement, in consultation with workers and their representatives, a workplace policy on violence and harassment. Finnish legislation does not expressly require all employers to adopt a separate workplace policy on violence and harassment in accordance with Convention No. 190. In practice, however, the obligations under the Occupational Safety and Health Act, the Non-discrimination Act and the Act on Equality between Women and Men require the employer to have procedures for preventing and addressing violence, harassment and discrimination.

SAK and STTK consider this to be one of the central shortcomings in the application of Convention No. 190 in practice in Finland. The employer's obligation to establish workplace-specific procedures for preventing violence and harassment is not sufficiently precise or uniform. In practice, some workplaces have adopted clear instructions, but in many workplaces the procedures are deficient, unknown to workers or too general.

SAK and STTK consider it necessary that the regulation be specified and that workplace-specific obligations include at least:

- zero tolerance for violence and harassment,
- definitions of violence, harassment, sexual harassment and gender-based harassment,
- reporting channels and their accessibility,
- time limits for the handling of cases,
- persons or bodies responsible,
- the worker's right to support,
- the principles of confidentiality and communication of information,
- the prohibition of retaliation,
- the participation of workers and their representatives,
- the monitoring and assessment of cases of harassment and violence.

SAK and STTK emphasize that a workplace policy must not be a merely formal document. It must be known to workers, function in practice and be accessible also to workers whose language skills, form of employment or position at the workplace make it more difficult to exercise their rights.

Occupational safety and health management and psychosocial risks

The identification and assessment of hazards under the Occupational Safety and Health Act covers, as a starting point, psychosocial workload factors as well as harassment, inappropriate treatment and the threat of violence, but the regulation should be specified further. Under the leadership of the Ministry of Social Affairs and Health, regulation at decree level specifying the Occupational Safety and Health Act has been prepared on a tripartite basis in order to prevent psychosocial workload factors, harassment and violence. In the view of SAK and STTK, the progress of the projects has stalled because of opposition from the employers' side, although the need for more precise regulation has long been recognized. From the perspective of Convention No. 190, violence and harassment must be included as part of occupational safety and health management at the workplace in the same way as other risks relating to occupational safety and health.

SAK and STTK consider that, in practice, the assessment of psychosocial risks remains insufficient in many workplaces. Risk assessments may focus on physical risks, while risks related to the organization of work, management, time pressure, inappropriate exercise of power, violence caused by customers, digital harassment, lone working, night work and discrimination receive less attention.

SAK and STTK consider it important that risk assessments concerning violence and harassment also include structural factors relating to work. For example, insecure employment relationships, dependency on a supervisor's decisions on work shifts, subcontracting chains, language barriers, employer-provided accommodation and the worker's right of residence being linked to work may increase the worker's exposure to harassment and exploitation. These factors must be identified as part of occupational safety and health management.

Identification of hazards and assessment of risks with the participation of workers and their representatives

Under the Occupational Safety and Health Act, the employer must investigate and identify the hazards and risk factors arising from the work, working hours, workplace, other working environment and working conditions. The participation of workers and their representatives is indispensable, particularly in the assessment of risks of violence and harassment, because these risks are not always visible in the employer's documents, official reports or accident statistics.

SAK and STTK consider that workers' participation in risk assessment is realized unevenly in Finland. Occupational safety and health representatives, shop stewards and other personnel representatives have an important role, but their actual possibilities to influence matters depend on the size of the workplace, the degree of unionization, the employer's attitude and the resources available. From the perspective of Convention No. 190, it must be ensured that developments in labour-market regulation do not weaken such participation.

SAK and STTK consider it essential that risk assessments make use of workers' experiential knowledge, staff surveys, observations from occupational health care, information from occupational safety and health enforcement, equality and non-discrimination planning, and sector-specific research evidence. Particular attention must be paid to ensuring that workers in situations of vulnerability can also participate safely without fear of retaliation.

Information and training for workers and other persons concerned

Section 14 of the Occupational Safety and Health Act requires the employer to provide the worker with adequate instruction and guidance for the prevention of hazards and risks at work. From the perspective of Convention No. 190, this means that workers must be provided with clear and accessible information on the risks of violence and harassment, the employer's obligations, workers' rights, reporting channels, investigation procedures, the prohibition of retaliation and support services.

SAK and STTK consider that shortcomings in training and guidance are a significant practical problem. Workers do not always know what is regarded as harassment, how to report it, who handles the matter, what happens after a report has been made or how they are protected against retaliation. Especially in respect of migrant workers, posted workers, young workers, temporary agency workers, part-time workers and workers in insecure positions, instructions must be understandable, multilingual and practical.

SAK and STTK consider it important that training also be provided to supervisors, occupational safety and health representatives, shop stewards and human resources personnel. Supervisors must understand the employer's duty to act, the limits of confidentiality, support for the victim, the prohibition of retaliation and when the matter must be referred onwards, for example to the occupational safety and health authority or the police.

Overall assessment

According to the overall assessment of SAK and STTK, the regulation concerning employers' obligations in Finland provides a basis for the application of Convention No. 190, but it does not yet guarantee equal and effective protection for all workers. The practical implementation of the obligations varies too much between workplaces and sectors. More precise regulation, guidance, enforcement, the strengthening of workplace-level procedures, the participation of workers' representatives and particular attention to workers in vulnerable situations are needed.

SAK and STTK consider that the application in practice of Article 9 of Convention No. 190 requires the strengthening of employer obligations. This is particularly important in working life where workers' ability to report violence and harassment also depends on their actual security at the workplace.

Sources: Occupational Safety and Health Act 738/2002, sections 8, 10, 14, 18, 19, 25, 27 and 28; Occupational Health Care Act 1383/2001; Non-discrimination Act 1325/2014, sections 5, 7, 14 and 16; Act on Equality between Women and Men 609/1986, sections 6 a, 6 c, 7 and 8 d; Act on Occupational Safety and Health Enforcement and Cooperation on Occupational Safety and Health at Workplaces 44/2006; Government Proposal HE 89/2023 vp; ILO Recommendation No. 206, in particular Paragraphs 7–10; Occupational Safety and Health Administration, Supervision of harassment and other inappropriate treatment, Occupational Safety and Health Enforcement Guidelines 1/2023; Finnish Institute of Occupational Health, Guide to the application of the Occupational Safety and Health Act; Ombudsman for Equality, Sexual and gender-based harassment; Non-Discrimination Ombudsman, Harassment.

V. ENFORCEMENT AND REMEDIES

Article 10(a) and (h). Monitoring and enforcement

Please indicate in the box "implementing measures" below the measures taken to monitor and enforce national laws and regulations regarding violence and harassment in the world of work (Article 10(a)).

Please also indicate the measures taken to ensure that labour inspectorates and other relevant authorities, as appropriate, are empowered to deal with violence and harassment in the world of work, including by issuing orders requiring measures with immediate executory force and orders to stop work in cases of an imminent danger to life, health or safety, subject to any right of appeal to a judicial or administrative authority which may be provided by law (Article 10(h)).

Please specify the relevant provisions of the laws, regulations, or collective agreements and provide details on any other measures.

Implementing measures:

In Finland, the monitoring and enforcement of provisions concerning violence and harassment in the world of work are divided between several authorities. The occupational safety and health authorities supervise compliance with the Occupational Safety and Health Act, minimum terms of employment, regulation concerning occupational safety and health cooperation and other labour regulation within the limits of their competence. The powers of the occupational safety and health authorities are provided for in the Act on Occupational Safety and Health Enforcement and Cooperation on

Occupational Safety and Health at Workplaces. The authorities have the right to carry out inspections, obtain information, issue instructions and improvement notices and, where necessary, use binding decisions.

The occupational safety and health authorities have competence to intervene in workplace conditions where the employer fails to fulfil its obligations under the Occupational Safety and Health Act. Under the Act on Occupational Safety and Health Enforcement, the authority may issue an instruction or an improvement notice and, in certain situations, a binding decision. In situations seriously endangering occupational safety and health, the authorities may also use immediate powers, including measures relating to the suspension of work where there is an imminent danger to the life or health of the worker. This is relevant for the purposes of Article 10(h) of Convention No. 190.

An occupational safety and health enforcement guideline has been issued on the supervision of harassment and other inappropriate treatment, with the aim of harmonizing enforcement practice and clarifying the role of the occupational safety and health authority. The occupational safety and health authority may supervise, in particular, whether the employer, after becoming aware of harassment or other inappropriate treatment, has taken the measures available to eliminate the defect. As a starting point, however, the task of the occupational safety and health authority is not to resolve disputes between individual persons or to award compensation, but to supervise the fulfilment of the employer's statutory obligations.

SAK and STTK note that the occupational safety and health authorities already supervise more than 100 statutes and that legislative amendments pending or under preparation may increase the tasks assigned to the authorities. SAK and STTK consider that developments in resources give rise to justified concern as to whether the resources of the occupational safety and health authorities are sufficient for the effective, proactive and risk-based enforcement required by Convention No. 190.

In matters concerning discrimination and harassment, competence is also vested in the Non-Discrimination Ombudsman, the Ombudsman for Equality, the National Non-Discrimination and Equality Tribunal and the courts. In criminal-law matters, competence lies with the police, the prosecutor and the courts. Occupational health care, for its part, has an important role in matters relating to work ability, psychosocial workload and support for the worker.

SAK and STTK consider that the enforcement system is legally multifaceted but fragmented from the worker's perspective. Matters relating to violence, harassment, discrimination, occupational safety and health, criminal law, occupational health care and labour exploitation may fall within the competence of several different authorities or procedures. In practice, it may be difficult for the worker to know whom to contact, on what basis the matter will be assessed and what remedies are available.

Taking into account the tasks of the occupational safety and health authority and the resources available, SAK and STTK consider it a particular problem that enforcement is inevitably, in many respects, complaint-driven. This is not sufficient from the perspective of the objectives of Convention No. 190, because victims of violence, harassment and exploitation often do not dare or do not have the strength to report the matter. Fear of retaliation, loss of employment, reduction of shifts, non-renewal of a fixed-term contract, jeopardizing a residence permit or stigmatization in the workplace community may prevent reporting. This applies in particular to workers in situations of vulnerability.

SAK and STTK consider that the resources for occupational safety and health enforcement and the effectiveness in practice of the use of enforcement powers must be strengthened. Enforcement should be more proactive, more risk-based and more proactive than at present. Particular attention must be paid to sectors where barriers to reporting for workers is high and where the risk of labour exploitation, violence caused by customers or third parties, sexual harassment or psychosocial workload is significant.

The importance of enforcement is emphasized in particular where the worker's own bargaining position is weak or where reporting may give rise to fear of retaliation. SAK and STTK consider that the application of Convention No. 190 in practice requires that enforcement not be left dependent on the activity of an individual worker.

SAK and STTK also consider it important to strengthen cooperation between authorities. The occupational safety and health authorities, the police, the non-discrimination and equality authorities, the Finnish Immigration Service, the Tax Administration, occupational health care and victim support services must be able to refer the worker to the correct procedure and ensure that the worker does not have to start the process from the beginning with each different authority. Clearer cooperation practices are needed, in particular in overlapping situations involving labour exploitation and harassment.

Sources: Act on Occupational Safety and Health Enforcement and Cooperation on Occupational Safety and Health at Workplaces 44/2006, in particular sections 3–5, 11, 13, 15 and 16; Occupational Safety and Health Act 738/2002, in particular sections 8, 10, 23, 27 and 28; Non-discrimination Act 1325/2014; Act on Equality between Women and Men 609/1986; Criminal Code 39/1889; Government Proposal HE 89/2023 vp; Occupational Safety and Health Administration, Supervision of harassment and other inappropriate treatment, Occupational Safety and Health Enforcement Guidelines 1/2023; Occupational Safety and Health Administration, Work-related exploitation; Ministry of Social Affairs and Health, Guidance on occupational safety and health enforcement and the use of powers; HEUNI, From Rights on Paper to Rights in Action, Report Series No. 109, 2024; Ministry of Economic Affairs and Employment, Action Plan against Labour Exploitation, 2024.

Article 10(b) and (e). Remedies and support to victims and access to complaint and dispute resolution mechanisms

1. *Please describe in the box "implementing measures" below how easy access is ensured to appropriate and effective remedies and safe, fair and effective reporting and dispute resolution mechanisms and procedures in cases of violence and harassment in the world of work, such as:*

- *complaint and investigation procedures, as well as, where appropriate, dispute resolution mechanisms at the workplace level (Article 10(b)(i));*

- *dispute resolution mechanisms external to the workplace (Article 10(b)(ii));*
- *courts or tribunals (Article 10(b)(iii));*
- *protection against victimization of or retaliation against complainants, victims, witnesses and whistle-blowers (Article 10(b)(iv)); and*
- *legal, social, medical and administrative support measures available for complainants and victims (Article 10(b)(v)).*

Please specify the relevant provisions of the laws, regulations, or collective agreements and provide details on any other measures.

Implementing measures:

In Finland, workers have several possible channels for reporting violence and harassment, discrimination or inappropriate treatment in the world of work. A worker may report the matter to the employer, a supervisor, the occupational safety and health representative, the shop steward, occupational health care or the occupational safety and health authority. In matters concerning discrimination and harassment, the worker may also contact the Ombudsman for Equality or the Non-Discrimination Ombudsman. In serious cases involving violence, threats, sexual offences or exploitation, the matter may fall within the competence of the police and the criminal process.

At workplace level, under section 28 of the Occupational Safety and Health Act, the employer has a duty to take the measures available to it if the employer becomes aware of harassment or other inappropriate treatment causing harm or danger to the worker's health. Section 8 d of the Act on Equality between Women and Men and the provisions of the Non-discrimination Act concerning harassment reinforce the employer's responsibility to intervene in discrimination-based and gender-based harassment. Workplace procedures may include receiving the report, investigating the matter, hearing the parties, interim protective measures, measures aimed at ending the harassment and follow-up.

Procedures external to the workplace include enforcement by the occupational safety and health authority, advice and supervision by the equality and non-discrimination ombudsmen, proceedings before the National Non-Discrimination and Equality Tribunal, courts, the police and the criminal process, as well as support from occupational health care and victim support services. Depending on the situation, the worker may have the right to damages, compensation under the Act on Equality between Women and Men or the Non-discrimination Act, wage claims, consequences relating to termination of employment, criminal injuries compensation or other support.

SAK and STTK consider that the system formally fulfils several of the requirements of Article 10(b) of Convention No. 190. However, shortcomings remain in its application in practice, relating to the fragmentation, slowness, burdensome nature and legal complexity of the procedures. From the worker's perspective, it is not always clear which procedure applies to their situation, what sanctions or remedies may be available, who bears the burden of proof and what risks are associated with the process.

A particularly serious problem is the very high cost risk of civil proceedings. A victim of harassment, discrimination or other inappropriate treatment may have to consider whether they have the financial possibility to bring the matter before a court. This may prevent the exercise of rights even in situations where the worker has a substantively well-founded claim. The requirement under Convention No. 190 of easy access to appropriate and effective remedies presupposes that the procedural threshold does not become unreasonably high.

SAK and STTK consider it necessary to strengthen readily accessible and effective remedies. The competence and accessibility of the National Non-Discrimination and Equality Tribunal should be strengthened, particularly in relation to harassment and discrimination in working life. Workers should have access to free or affordable legal advice, interpretation, psychosocial support and guidance at the different stages of the process. In particular for migrant workers and victims of labour exploitation, it must be ensured that reporting does not endanger their residence, livelihood or possibility to claim what is owed to them.

Protection against retaliation is central from the perspective of Convention No. 190. The Non-discrimination Act and the Act on Equality between Women and Men contain protection against retaliation, and employment contract legislation and the Occupational Safety and Health Act safeguard the worker's position in different ways. However, SAK and STTK consider that protection against retaliation in practice is not sufficiently effective. Retaliation does not always take the form of direct dismissal, but may consist of reducing shifts, non-renewal of a fixed-term contract, changes to duties, pressure, isolation, damage to reputation or other adverse treatment.

The worker's effective protection against retaliation is decisive for barriers to reporting. From the perspective of Convention No. 190, it is necessary to assess whether national procedures strengthen the worker's confidence to report violence, harassment and discrimination.

SAK and STTK consider that the effectiveness of the system of remedies must be assessed from the perspective of the worker's position in practice. A procedure is not safe, fair and effective within the meaning of Convention No. 190 if the worker does not in practice feel able to use it or if the process is so lengthy, costly and burdensome that it remains only a formal possibility.

SAK and STTK emphasize that, in Finland, a central obstacle to achieving the objectives of Convention No. 190 is the lack of safe, effective and preventive remedies. The particularly serious problems are the risk of legal costs and unreasonably lengthy judicial proceedings.

Sources: Occupational Safety and Health Act 738/2002, sections 8, 10, 23, 27 and 28; Act on Occupational Safety and Health Enforcement and Cooperation on Occupational Safety and Health at Workplaces 44/2006, in particular sections 13, 15 and 16; Non-discrimination Act 1325/2014, in particular sections 14, 16 and 23; Act on Equality between Women and Men 609/1986, in particular sections 7, 8 d and 11; Employment Contracts Act 55/2001; Criminal Code 39/1889; Government

2. *Please specify in the box “implementing measures” below how it is ensured that victims of gender-based violence and harassment in the world of work have an effective access to gender-responsive, safe and effective complaint and dispute resolution mechanisms, support, services and remedies (Article 10(e)). Please also specify the relevant provisions of the laws, regulations, collective agreements or other measures.*

Implementing measures:

In relation to gender-based violence and harassment and sexual harassment, the central national regulation is contained in the Act on Equality between Women and Men. Section 7 of the Act on Equality between Women and Men defines sexual harassment and gender-based harassment as prohibited discrimination. Under section 8 d of the Act on Equality between Women and Men, the employer's conduct is considered to constitute prohibited discrimination if, after becoming aware that a worker has been subjected at work to sexual harassment or gender-based harassment, the employer neglects to take the measures available to eliminate the harassment.

The Ombudsman for Equality provides advice and supervises compliance with the Act on Equality between Women and Men. The National Non-Discrimination and Equality Tribunal may examine matters concerning equality and non-discrimination within the limits of its competence. In addition, the worker may bring the matter before a court and claim compensation under the Act on Equality between Women and Men or other remedies. In serious situations involving sexual violence, threats or other criminal offences, the matter may fall within the scope of criminal proceedings.

SAK and STTK consider that the regulation legally recognizes gender-based and sexual harassment. The practical problem, however, is that gender-responsive, safe and effective procedures are not implemented equally in all workplaces. Reporting sexual and gender-based harassment is often associated with particular shame, fear, relationships of dependency and pressure within the workplace community. The victim may have a justified fear that they will not be believed, that the matter will be trivialized, that they will be labelled as a difficult worker or that their labour-market position will deteriorate.

SAK and STTK consider it important that gender-responsiveness be understood as practical procedures and not merely as a general principle. Workplaces must have clear and confidential reporting channels, the ability to obtain support before making a report, competent persons handling the matter, protection of the victim during the process, the prohibition of retaliation, prompt intervention and follow-up. The procedures must also take into account that the perpetrator may be a supervisor, a representative of the employer, a customer, a patient, a service user or another third party.

Gender-responsive procedures also require the recognition of intersectional discrimination. A migrant woman, a young worker, a worker with disabilities, a person belonging to a gender minority, a fixed-term worker or a worker whose right of residence depends on the employer may be in a particularly vulnerable situation. In such situations, a merely formal reporting channel is not sufficient if the worker does not in practice feel able to use it.

SAK and STTK consider that the effectiveness of legal protection is weakened by the fact that compensation under the Act on Equality between Women and Men often requires bringing the matter before a court. This entails a cost risk, a lengthy process and a considerable psychological burden for the victim. From the perspective of Article 10(e) of Convention No. 190 and Recommendation No. 206, it must be assessed whether the system genuinely provides effective and safe legal protection for victims of gender-based violence and harassment.

SAK and STTK consider it necessary that, in relation to gender-based harassment and sexual harassment, the following be developed:

- readily accessible legal advice,
- workplace-specific confidential reporting channels,
- training for supervisors and personnel representatives,
- psychosocial support for the victim,
- procedures in which the victim is not unnecessarily exposed to encountering the perpetrator,
- clear practices concerning the prohibition of retaliation,
- faster and less risky remedies,
- multilingual and accessible information on rights.

SAK and STTK emphasize that the gender-responsive approach required by Convention No. 190 also presupposes an assessment of structures in working life. Insecure employment relationships, part-time work, dependency on work shifts, workplace hierarchies, male-dominated or female-dominated sectors, power relations in customer work and workplace culture may affect whether conditions conducive to harassment arise and whether workers dare to report their experiences.

SAK and STTK consider that the application of Convention No. 190 in practice must also assess the gender impacts of changes in working life and their effects on reporting harassment. This is important to ensure that the protection of victims of gender-based harassment does not remain merely formal.

Sources: Act on Equality between Women and Men 609/1986, in particular sections 6 a, 6 c, 7, 8 d and 11; Non-discrimination Act 1325/2014, in particular sections 14, 16 and 23; Occupational Safety and Health Act 738/2002, sections 8, 10 and 28; Criminal Code 39/1889, in particular Chapter 20; Government Proposal HE 89/2023 vp; Ombudsman for Equality, Sexual and gender-based harassment; Ombudsman for Equality, 5 June 2024, Sexual and gender-based harassment: the employer has a broad duty to act; Report of the Ombudsman for Equality to Parliament 2022, K 1/2022 vp; Report of the Non-Discrimination Ombudsman to Parliament 2026, K 2/2026 vp; ILO Recommendation No. 206, in particular Paragraphs 16 and 17.

Article 10(c). Protection of privacy and confidentiality

Please indicate in the box "implementing measures" below the measures taken to protect the privacy of individuals involved in cases of violence and harassment in the world of work and confidentiality, to the extent possible and as appropriate, and to ensure that requirements for privacy and confidentiality are not misused. Please specify the relevant provisions of the laws, regulations, collective agreements or other measures.

Implementing measures:

In Finland, the protection of privacy and confidentiality in situations involving violence and harassment in the world of work is based on several mutually complementary regulatory frameworks. Section 10 of the Constitution safeguards the protection of private life. The processing of personal data is governed by the EU General Data Protection Regulation and the Data Protection Act 1050/2018. In working life, the processing of personal data is further specified by the Act on the Protection of Privacy in Working Life 759/2004, under which the employer may process only personal data that are directly necessary for the employment relationship. In the processing of data by public authorities, the Act on the Openness of Government Activities 621/1999, in particular its provisions on confidentiality, is also relevant. Occupational health care data and health data fall within a particularly confidential sphere.

From the perspective of Article 10(c) of Convention No. 190, the protection of privacy and confidentiality is indispensable for the legal protection of the victim, the complainant, witnesses and other persons concerned. Reports concerning violence, harassment, sexual harassment, gender-based harassment or labour exploitation may contain sensitive personal data, information concerning health, work ability, gender, origin, sexual orientation, suspected criminal offences or other information requiring special protection from the perspective of private life. Such information must be processed carefully, in a restricted manner and only to the extent required for investigating the matter and fulfilling the employer's statutory obligations.

SAK and STTK emphasize, however, that confidentiality must not be used in a manner that prevents the employer from fulfilling its duty of care under section 8 of the Occupational Safety and Health Act, its duty to identify and assess hazards under section 10, or its duty under section 28 to take measures to eliminate harassment and other inappropriate treatment. The purpose of confidentiality is to protect the victim, the complainant and witnesses — not to prevent intervention in harassment, violence, discrimination or retaliation.

The employer must protect the privacy of the persons concerned and process personal data in accordance with data protection principles, but at the same time it must investigate the report appropriately, hear the persons concerned, take the necessary measures and ensure the safety of the whole workplace community. Data protection principles, such as the principles of necessity, purpose limitation, minimization and confidentiality, should not be interpreted in such a way that the employer could leave the matter uninvestigated or fail to intervene in a situation endangering the safety of the workplace community.

SAK and STTK consider it important that legislation be clarified and that workplaces establish clear procedures for handling reports concerning violence, harassment and inappropriate treatment. The procedures must define at least:

- who receives reports,
- who handles the matter,
- how information is documented,
- to whom information may be disclosed,
- how the persons concerned are heard,
- how the protection of witnesses and complainants is ensured,
- how unnecessary dissemination of information within the workplace community is prevented,
- how it is ensured that confidentiality is not used as an instrument of silence or avoidance of responsibility.

SAK and STTK consider that, in current practice, workplace procedures vary in this respect. Some workplaces have clear confidential reporting channels and handling processes, but in many workplaces workers do not know who processes the information, how the matter proceeds or how their privacy and safety are ensured. This may increase barriers to reporting particularly in situations involving sexual harassment, gender-based harassment, racist harassment and labour exploitation.

The application of Convention No. 190 in practice requires that confidentiality, data protection and the employer's duty to act be reconciled in practice. SAK and STTK consider it important that the occupational safety and health authorities, the

equality and non-discrimination authorities and the social partners produce clear guidance on how workplaces can handle reports of harassment and violence lawfully, while protecting the victim and intervening effectively.

Sources: Constitution of Finland 731/1999, section 10; Regulation (EU) 2016/679 of the European Parliament and of the Council, in particular Articles 5, 6 and 9; Data Protection Act 1050/2018; Act on the Protection of Privacy in Working Life 759/2004, in particular sections 3 and 5; Act on the Openness of Government Activities 621/1999, in particular section 24; Occupational Safety and Health Act 738/2002, in particular sections 8, 10 and 28; Occupational Health Care Act 1383/2001; Government Proposal HE 89/2023 vp; Occupational Safety and Health Administration, Supervision of harassment and other inappropriate treatment, Occupational Safety and Health Enforcement Guidelines 1/2023; Finnish Institute of Occupational Health, Guide to the application of the Occupational Safety and Health Act.

Article 10(d). Sanctions

Please indicate in the box “implementing measures” below the sanctions provided for, where appropriate, in cases of violence and harassment in the world of work. Please specify the relevant provisions of the laws, regulations, or collective agreements and provide details on any other measures.

Implementing measures:

In Finland, in situations involving violence and harassment in the world of work, sanctions may arise under several different regulatory frameworks. Under the Occupational Safety and Health Act and the Act on Occupational Safety and Health Enforcement and Cooperation on Occupational Safety and Health at Workplaces, the occupational safety and health authority may issue instructions, improvement notices and, where necessary, binding decisions to the employer. In cases of serious breaches of occupational safety and health obligations, criminal liability may also arise, for example for an occupational safety offence.

Under the Non-discrimination Act and the Act on Equality between Women and Men, a worker who has been subjected to harassment or discrimination may be entitled to compensation. Under the Employment Contracts Act, a worker may be entitled to damages or other employment-law consequences if the employer has breached its obligations. Under the Criminal Code, sanctions may arise, for example, for assault, unlawful threat, sexual offences, work discrimination, extortionate work discrimination, aggravated extortionate work discrimination, trafficking in persons or aggravated trafficking in persons.

SAK and STTK consider that the system of sanctions is formally broad, but that its effectiveness in practice is insufficient. A central problem is that many forms of violence, harassment, discrimination and exploitation do not come to the attention of the authorities. Sanctions cannot operate effectively or provide an adequate deterrent if workers do not feel able to report the matter, if reports do not lead to adequate investigation or if the process is so lengthy and burdensome that workers abandon the matter.

Compensation and damages systems are in many situations dependent on the individual worker's activity, legal knowledge and capacity to bear risk. This is problematic from the perspective of Convention No. 190, because the Convention requires effective, safe and accessible remedies. If a sanction in practice requires the worker to bring the matter before a court and bear the risk of litigation costs, legal protection may remain merely formal.

SAK and STTK consider it indispensable that the effectiveness of sanctions be assessed from the perspective of the worker's position in practice. In the view of SAK and STTK, sanctions should be effective in practice, proportionate to the violation and capable of providing a genuine deterrent. In addition, the system must encourage employers to take preventive measures and not merely react to individual cases after the fact. Employers must face a real risk of sanctions where they neglect risk assessment, reporting procedures, intervention in harassment, protection of victims or prevention of retaliation.

SAK and STTK consider that the sanctions available under national law in cases of employer non-compliance do not currently provide a sufficiently effective or deterrent response in practice. The length, cost and uncertainty of legal proceedings mean that the system of sanctions does not provide victims with sufficiently effective protection and does not otherwise operate with sufficient effectiveness in practice.

SAK and STTK consider it indispensable that the amount of compensation under the Act on Equality between Women and Men be increased significantly in order to achieve the effectiveness, dissuasiveness and preventive effect of sanctions. In addition, SAK and STTK consider it necessary to take measures to lower the litigation-cost risk of a person who has been subjected to alleged discrimination and to increase free advice.

SAK and STTK consider that accessible sanction and compensation mechanisms must be strengthened. The development of the competence of the National Non-Discrimination and Equality Tribunal should be strengthened by reference to whether it could provide more effective and more accessible remedies in cases of harassment and discrimination in working life. The possibilities of the occupational safety and health authorities to intervene in deficiencies in employers' procedures must also be strengthened from the present level.

Particular attention must be paid to retaliation. Retaliatory measures may be direct or indirect and may take the form, for example, of reducing shifts, termination of employment, non-renewal of a fixed-term contract, changes to duties, pressure or isolation from the workplace community. SAK and STTK consider that retaliation should in practice give rise to effective sanctions. Otherwise, the protection of workers who report remains weak.

From the perspective of Convention No. 190, the sanctions system must provide the worker with real protection also where reporting is associated with fear of adverse consequences. Otherwise, sanctions remain formal and do not guide employers towards prevention.

Sources: Act on Occupational Safety and Health Enforcement and Cooperation on Occupational Safety and Health at Workplaces 44/2006, in particular sections 13, 15 and 16; Occupational Safety and Health Act 738/2002; Non-discrimination

Act 1325/2014, in particular section 23; Act on Equality between Women and Men 609/1986, in particular section 11; Employment Contracts Act 55/2001; Criminal Code 39/1889, in particular Chapters 20, 21, 25 and 47; Government Proposal HE 89/2023 vp; Report of the Non-Discrimination Ombudsman to Parliament 2026, K 2/2026 vp; Ombudsman for Equality, Opinion on the Report of the Non-Discrimination Ombudsman to Parliament 2026; Occupational Safety and Health Administration, Supervision of harassment and other inappropriate treatment, Occupational Safety and Health Enforcement Guidelines 1/2023.

Article 10(f). Impact of domestic violence in the world of work

Please indicate in the box "implementing measures" the measures taken to recognize the effects of domestic violence and, so far as is reasonably practicable, to mitigate its impact in the world of work. Please specify the relevant provisions of the laws, regulations, or collective agreements and provide details on any other measures.

Implementing measures:

Article 10(f) of Convention No. 190 requires the effects of domestic violence to be recognized and, so far as is reasonably practicable, mitigated in the world of work. Paragraph 18 of ILO Recommendation No. 206 states that such measures may include, for example, leave for victims of domestic violence, flexible work arrangements, temporary protection against dismissal, the inclusion of domestic violence in workplace risk assessments, referral to public support services and awareness-raising.

SAK and STTK consider that the effects of domestic violence in the world of work are not yet sufficiently recognized in Finland. National legislation does not contain explicit general regulation requiring employers to establish procedures for recognizing and mitigating the effects of domestic violence in the world of work.

The Service Union United PAM, a member organization of SAK, has sought to negotiate with the employers' side collective agreement provisions recognizing the effects of domestic violence in the world of work and supporting the position of victims. The employers' side has not been prepared to include such provisions in collective agreements. SAK considers that this demonstrates the need to strengthen national measures by which the obligations under Article 10(f) of Convention No. 190 can be implemented effectively in practice.

At workplaces, domestic violence is therefore often treated as a matter belonging to private life, even though it may have significant effects on the worker's safety, work ability, absences, concentration, work performance and workplace safety.

Domestic violence may extend to the workplace in many ways. The perpetrator may harass the victim at the workplace, follow the victim during commuting, send threatening messages during the working day, appear at the workplace or use information on the worker's working hours and workplace as a means of control. Remote work may in some situations increase the risk if the home is not a safe place for the worker. SAK and STTK consider that the workplace may have an important role in supporting the victim, safety planning and referral to services.

SAK and STTK consider it indispensable that the effects of domestic violence in the world of work be included among the areas for development in the application of Convention No. 190 in practice. Workplaces should establish procedures through which the employer, occupational health care, occupational safety and health cooperation and personnel representatives can recognize the effects of domestic violence and refer the worker to appropriate support. The procedures must be confidential, respectful of the victim and focused on safety.

Possible measures in working life include, for example:

- flexible working-time and work arrangements,
- safe arrangements for remote work or work at the workplace, depending on the situation,
- protecting the workstation, work shifts or contact details,
- workplace safety planning,
- referral to occupational health care and support services,
- confidential discussion support,
- handling absences without blaming the victim,
- temporary protection against dismissal or other adverse consequences where domestic violence underlies issues relating to work ability or absences.

SAK and STTK consider that, in recognizing domestic violence, both indifference and excessive interference by the employer in private life must be avoided. It is not the employer's role to investigate domestic violence as a criminal matter, but to recognize its effects on work, work ability and safety and to refer the worker to appropriate support. This requires training for supervisors, occupational health care and personnel representatives.

SAK and STTK consider that taking into account the effects of domestic violence in the world of work is one of the central areas for development in the application of Convention No. 190 in practice in Finland. Without explicit workplace models, guidance and awareness-raising, the application in practice of Article 10(f) of Convention No. 190 will remain insufficient.

Sources: ILO Convention No. 190, Article 10(f); ILO Recommendation No. 206, Paragraph 18; Government Proposal HE 89/2023 vp; Occupational Safety and Health Act 738/2002, sections 8 and 10; Occupational Health Care Act 1383/2001; Act on Equality between Women and Men 609/1986; Ombudsman for Equality, materials concerning sexual and gender-based harassment; national guidance on workplace safety planning and occupational health care.

Article 10(g). Workers' right of removal and duty to inform management

Please indicate in the box "implementing measures" below how it is ensured that workers have the right to remove themselves from a work situation which they have reasonable justification to believe presents an imminent and serious danger to life, health or safety due to violence and harassment, without suffering retaliation or other undue consequences, and the duty to inform management. Please specify the relevant provisions of the laws, regulations, or collective agreements and provide details on any other measures.

Implementing measures:

Under section 23 of the Occupational Safety and Health Act, a worker has the right to refrain from work if the work causes serious danger to the worker's own life or health or to the life or health of other workers. The worker must notify the employer or the employer's representative of the refusal to work as soon as possible. The right to refrain from work continues until the employer has eliminated the risk factors or otherwise ensured that the work can be performed safely.

Article 10(g) of Convention No. 190 requires that workers have the right to remove themselves from a work situation which they have reasonable justification to believe presents an imminent and serious danger to life, health or safety due to violence or harassment, without suffering retaliation or other undue consequences. Section 23 of the Finnish Occupational Safety and Health Act provides the basic legal basis for this right.

SAK and STTK consider that the right to refrain from work must be interpreted in the light of Convention No. 190 so that it also covers situations of violence and harassment. Such situations may include, for example, an imminent threat of violence caused by a customer or patient, threats at the workplace, serious sexual harassment, stalking, violent behaviour, a serious threat arising in accommodation provided by the employer, or digital threats that make continuing the work immediately dangerous.

SAK and STTK consider it important that the worker's assessment of the danger is not assessed afterwards in an unreasonably strict manner as a neglect of duties. Convention No. 190 refers to a situation in which the worker has reasonable justification to believe that the danger is imminent and serious. The worker must not be placed in a position where they have to choose between protecting their health and protecting their employment relationship. Particularly in customer work, care and social services, education, security work, transport, the restaurant sector, night work, lone working and home visits, workers must have clear instructions on when they may remove themselves from the work situation and to whom the matter must be reported.

SAK and STTK consider that workplaces need to specify procedures for:

- when the worker may remove themselves from a situation made dangerous by violence or harassment,
- how the notification is to be made,
- to whom the notification is to be made,
- how the worker is protected against retaliation,
- how the situation is documented,
- how the employer assesses and eliminates the danger,
- how the worker's return to work is organized safely.

SAK and STTK emphasize that the worker's right to remove themselves from a dangerous situation must not remain merely formal. Workers must be aware of this right, and there must be practical guidance on its exercise. In particular, young workers, migrant workers, temporary agency workers, part-time workers, fixed-term workers and other workers in insecure positions may fear that removal will be interpreted as a refusal to work or will lead to adverse consequences.

The effective application of Convention No. 190 in practice requires that workers have clear and functioning protection against retaliation also when they exercise their right under section 23 of the Occupational Safety and Health Act to remove themselves from a dangerous situation.

SAK and STTK consider it important that the occupational safety and health authorities and the social partners provide guidance, specified from the perspective of Convention No. 190, on the worker's right of removal in situations involving violence and harassment. At workplaces, this right should be included in induction, plans for managing the threat of violence, instructions for handling harassment and sector-specific guidance for high-risk sectors.

Sources: Occupational Safety and Health Act 738/2002, section 23 and sections 8, 10, 27 and 28; Government Proposal HE 89/2023 vp; ILO Convention No. 190, Article 10(g); Finnish Institute of Occupational Health, Guide to the application of the Occupational Safety and Health Act, section 23, worker's right to refrain from work; Occupational Safety and Health Administration, Inappropriate treatment; Occupational Safety and Health Administration, guidance concerning the threat of violence and harassment.

VI. GUIDANCE, TRAINING AND AWARENESS-RAISING

Article 11(a). Addressing violence and harassment in the world of work in relevant national policies

Please indicate in the box “implementing measures” below the steps taken, in consultation with representative employers’ and workers’ organizations, seeking to ensure that violence and harassment in the world of work is addressed in relevant national policies, such as those concerning occupational safety and health, equality and non-discrimination, and migration.

Implementing measures:

Violence and harassment in the world of work are addressed in Finland in several national policies and regulatory frameworks. The central policy areas are occupational safety and health, equality and non-discrimination, gender equality, the prevention of labour exploitation, migration and integration policy, crime prevention, action against trafficking in persons and the development of working life. Through these policies it is possible to address issues essential from the perspective of Convention No. 190, such as workplace risk assessment, intervention in harassment, support for victims, enforcement by public authorities, training and the protection of workers in situations of vulnerability.

In policies concerning occupational safety and health, violence and harassment are linked in particular to psychosocial workload factors, the threat of violence, harassment, inappropriate treatment, risks caused by customers and other third parties, and the effects of the organization of work. The identification and assessment of hazards at work under the Occupational Safety and Health Act provides the basis for addressing these issues at workplaces. SAK and STTK nevertheless consider that the perspective of violence and harassment is not yet reflected sufficiently systematically in all occupational safety and health policy measures.

In policies concerning equality and gender equality, harassment and discrimination in working life are central issues. The Act on Equality between Women and Men and the Non-discrimination Act require employers to promote equality and non-discrimination and to take action in relation to harassment. SAK and STTK consider that, from the perspective of the application of Convention No. 190 in practice, it is important to link workplace equality and non-discrimination planning more clearly than at present to the prevention of violence and harassment, the prevention of sexual and gender-based harassment, the recognition of intersectional discrimination and the prevention of retaliation.

In policies concerning migration and the prevention of labour exploitation, Convention No. 190 is of particular importance. Migrant workers, posted workers, seasonal workers and workers whose position is dependent on the employer may be particularly exposed to violence, threats, intimidation, control, economic exploitation and harassment. SAK and STTK consider that combating labour exploitation must be understood as part of the application of Convention No. 190 in practice, because practices connected with exploitation may cause economic, psychological and physical harm to the worker.

SAK and STTK consider it important that national policies also recognize the effects of domestic violence in the world of work. Article 10(f) of Convention No. 190 requires Members to recognize the effects of domestic violence and, so far as is reasonably practicable, to mitigate its impact in the world of work, while Recommendation No. 206 provides guidance on measures that may be taken to that end. In Finland, this perspective is still weakly integrated into labour policy, workplace risk assessments and employer guidance.

SAK and STTK consider that policies concerning violence and harassment in Finland remain too fragmented. Occupational safety and health, anti-discrimination, gender equality, labour exploitation, migration, criminal liability, occupational health care and victim services form an overall framework, but they are not always examined coherently from the perspective of Convention No. 190. As a result, the worker’s path to legal protection may remain unclear and the division of responsibilities between authorities fragmented.

SAK and STTK consider that national policies must be examined as a whole in the light of Convention No. 190. This also applies to changes in working-life regulation where they affect workers’ effective ability to report violence, harassment, discrimination or exploitation.

SAK and STTK consider it necessary that Finland adopt or update a comprehensive policy line or monitoring framework for the application of Convention No. 190 in practice. It should bring together occupational safety and health, gender equality, non-discrimination, the prevention of labour exploitation, the protection of migrant workers, occupational health care, victim services, enforcement by public authorities and workplace-level procedures. The application of Convention No. 190 in practice must take place on a genuinely tripartite basis, making use of the sector-specific expertise of workers’ and employers’ organizations.

Sources: Government Proposal HE 89/2023 vp; Occupational Safety and Health Act 738/2002; Non-discrimination Act 1325/2014; Act on Equality between Women and Men 609/1986; Occupational Health Care Act 1383/2001; Act on Occupational Safety and Health Enforcement and Cooperation on Occupational Safety and Health at Workplaces 44/2006; Ministry of Economic Affairs and Employment, Action Plan against Labour Exploitation, 2024; HEUNI, From Rights on Paper to Rights in Action, Report Series No. 109, 2024; HEUNI, Nordic Perspectives on Labour Exploitation, Report Series No. 111, 2025; ILO Recommendation No. 206, in particular Paragraphs 18, 23 and 24.

Article 11(b) and (c). Guidance and training tools and awareness-raising campaigns

Please indicate in the box “implementing measures” below the steps taken, in consultation with representative employers’ and workers’ organizations, seeking to ensure that:

- *employers and workers and their organizations, and relevant authorities, are provided with guidance, resources, training or other tools, in accessible formats as appropriate, on violence and harassment in the world of work, including on gender-based violence and harassment;*
- *initiatives, including awareness-raising campaigns, are undertaken.*

Implementing measures:

In Finland, several authorities and expert bodies have produced guidance, training and information on violence and harassment in the world of work, inappropriate treatment, discrimination, sexual and gender-based harassment and labour exploitation. The key actors include, inter alia, the Occupational Safety and Health Administration, the Finnish Institute of Occupational Health, the Centre for Occupational Safety, the Ombudsman for Equality, the Non-Discrimination Ombudsman, Victim Support Finland, HEUNI and the labour market organizations.

The Occupational Safety and Health Administration issues guidance on harassment, inappropriate treatment, the threat of violence and labour exploitation, and supervises employers' obligations. The Finnish Institute of Occupational Health and the Centre for Occupational Safety have produced guidance and training materials for workplaces on occupational safety and health, psychosocial workload and workplace procedures. The Ombudsman for Equality provides guidance on sexual and gender-based harassment and on the employer's duty to act. The materials of the Non-Discrimination Ombudsman, in turn, address harassment from the perspective of the Non-discrimination Act. Victim Support Finland and HEUNI provide information on labour exploitation and support for victims.

SAK and STTK consider the existing guidance important and necessary. The problem, however, is that information does not reach all workers and all workplaces equally. In particular, migrant workers, posted workers, seasonal workers, young workers, temporary agency workers, platform workers, workers in low-paid sectors and workers in insecure employment relationships may not know their rights or know where to obtain assistance. In small workplaces and subcontracting chains, information may also remain inadequate.

SAK and STTK consider that the application of Convention No. 190 in practice requires more targeted, multilingual and accessible guidance than at present. Guidance must also be understandable for workers who do not have strong Finnish or Swedish language skills or previous experience of Finnish working life. General material available only on websites is not sufficient if it does not reach workers employed in high-risk sectors. Information must be taken to workplaces, educational institutions, receiving employers, subcontracting chains and sector-specific networks.

SAK and STTK consider it important that training also be directed to employers, supervisors, human resources personnel, occupational safety and health representatives, shop stewards and occupational health care. Supervisors must be able to identify harassment, sexual harassment, gender-based harassment, racist harassment, retaliation, psychosocial workload and labour exploitation. They must also understand when the employer has a duty to act, how confidentiality is safeguarded and how the victim is protected.

Guidance and training under Convention No. 190 should be included in workplace induction, occupational safety and health action programmes, equality and non-discrimination plans and risk assessments. SAK and STTK consider it important that the prevention of violence and harassment does not remain a separate campaign, but becomes a permanent part of the workplace culture of safety and equality.

SAK and STTK consider that Finland also needs national and sector-specific awareness-raising campaigns. The campaigns should emphasize that violence, harassment, sexual harassment, gender-based harassment, racist harassment and labour exploitation have no place in the world of work. The campaigns should provide concrete information on how a worker can act, where assistance is available and what is required of the employer. Particular attention must be paid to high-risk sectors and workers in situations of vulnerability.

SAK and STTK also consider it important that guidance and campaigns do not focus only on the conduct of individual workers. The prevention of violence and harassment also requires an examination of structures in working life, the exercise of power, management, the organization of work, insecure employment relationships, working hours, subcontracting chains and risks caused by customers. Without this perspective, responsibility may be shifted too much onto the individual worker.

As working-life regulation changes, workers must be clearly informed of which rights remain in force, how harassment and violence can be reported and what protection against retaliation exists. In the application of Convention No. 190 in practice, it must be ensured that workers do not refrain from exercising their rights because of uncertainty or insufficient information.

SAK and STTK consider that national awareness-raising campaigns and public information are important, but they are not sufficient to achieve the objectives of Convention No. 190. SAK and STTK welcome the voluntary campaign against sexual harassment launched by the Ministry of Social Affairs and Health in 2026, but note that measures based on voluntary commitment are not sufficient. At national level, it is necessary to increase employers' responsibilities in the prevention of harassment and to strengthen sanctions in cases of violations.

Sources: Ministry of Social Affairs and Health: Commitment by working-life actors to eliminate sexual harassment (web page: <https://stm.fi/seksuaalisen-hairinnan-ehkaiseminen-tyoelamassa>).

Government Proposal HE 89/2023 vp; Occupational Safety and Health Administration, Inappropriate treatment; Occupational Safety and Health Administration, Supervision of harassment and other inappropriate treatment, Occupational Safety and Health Enforcement Guidelines 1/2023; Occupational Safety and Health Administration, Work-related exploitation; Finnish Institute of Occupational Health, Guide to the application of the Occupational Safety and Health Act; Centre for Occupational Safety, Harassment and inappropriate treatment; Ombudsman for Equality, Sexual and gender-based harassment; Non-Discrimination Ombudsman, Harassment; Victim Support Finland, Work-related exploitation; HEUNI, From Rights on Paper to Rights in Action, Report Series No. 109, 2024; ILO Recommendation No. 206, in particular Paragraphs 23 and 24.

VII. METHODS OF APPLICATION

Article 12. National laws, regulations, collective agreements and other measures consistent with national practice

If they have not been already listed above, please specify in the box "implementing measures" below:

- *the laws and regulations that apply the provisions of the Convention with their exact references (please include hyperlinks or, if not available, provide copies of these laws and regulations);*
- *any collective agreements that apply the provisions of the Convention (please include hyperlinks or, if not available, provide copies of these collective agreements); and*
- *any other measures consistent with national practice that have been adopted to apply the provisions of the Convention (such as extending or adapting existing occupational safety and health measures to cover violence and harassment and developing specific measures when necessary).*

Implementing measures:

Convention No. 190 has been implemented in Finland through national legislation, enforcement by public authorities, collective agreements, workplace-level procedures, occupational health care, occupational safety and health cooperation, and equality and non-discrimination planning. The key statutes are the Occupational Safety and Health Act 738/2002, the Employment Contracts Act 55/2001, the Non-discrimination Act 1325/2014, the Act on Equality between Women and Men 609/1986, the Criminal Code 39/1889, the Occupational Health Care Act 1383/2001, the Act on the Protection of Privacy in Working Life 759/2004 and the Act on Occupational Safety and Health Enforcement and Cooperation on Occupational Safety and Health at Workplaces 44/2006.

Finland approved and brought Convention No. 190 into force by the Act on the International Labour Organization Convention concerning the elimination of violence and harassment in the world of work 257/2024. The entry into force of Convention No. 190 was provided for by Government Decree 1028/2024, and Convention No. 190 entered into force for Finland on 7 June 2025. Government Proposal HE 89/2023 vp assessed the relationship between Finnish national legislation and the obligations under Convention No. 190 and concluded that ratification did not require extensive legislative amendments.

SAK and STTK consider that national regulation constitutes the formal basis for giving effect to Convention No. 190. Article 12 of Convention No. 190 nevertheless also permits and requires the use of other means consistent with national practice, including collective agreements and workplace-level measures. SAK and STTK consider it important that collective agreements and workplace-specific guidelines supplement legislation, particularly in matters where national regulation is general in nature.

Collective agreements may provide, for example, for strengthening occupational safety and health cooperation, training, procedures for the prevention of harassment and violence, well-being at work, working-time arrangements, workplace-specific safety planning, the role of shop stewards and occupational safety and health representatives, and support for victims. Workplace-specific guidelines may specify reporting channels, handling procedures, confidentiality, the prohibition of retaliation, the handling of risks caused by third parties and the recognition of the effects of domestic violence in the world of work.

SAK and STTK consider it particularly important that the application of Convention No. 190 in practice is not limited to the fact that individual relevant provisions can be found in different laws. Convention No. 190 requires a comprehensive, preventive and approach that is accessible to workers. For this reason, national implementing measures and their application in practice must be assessed by reference to whether they form a system of protection that is understandable and functional for the worker.

SAK and STTK consider that, in the current application of Convention No. 190 in practice, the central areas for development are:

- strengthening workplace-level procedures against violence and harassment,
- improving the quality of risk assessments,
- safeguarding the participation of workers and their representatives,
- strengthening the resources of occupational safety and health enforcement,
- developing readily accessible and effective remedies,
- strengthening gender-responsive procedures,
- improving the protection of workers in situations of vulnerability,
- recognizing the link between labour exploitation and Convention No. 190,
- taking into account the effects of domestic violence in the world of work,
- developing statistics and monitoring.

In the application of Article 12 of Convention No. 190, it must also be assessed whether collective agreements and workplace-level procedures sufficiently supplement legislation in situations where workers' bargaining position in practice or protection for reporting is weak.

SAK and STTK consider it indispensable that the application of Convention No. 190 in practice be monitored on a tripartite basis. Such monitoring must assess how national implementing measures, including legislation, collective agreements, enforcement by public authorities and workplace practices, together safeguard the right to a world of work free from violence and harassment. The assessment must be based not only on the formal existence of regulation, but also on workers' actual experiences and the functioning of remedies in practice.

Sources: Act on the International Labour Organization Convention concerning the elimination of violence and harassment in the world of work 257/2024; Government Decree 1028/2024; Government Proposal HE 89/2023 vp; Occupational Safety and Health Act 738/2002; Employment Contracts Act 55/2001; Non-discrimination Act 1325/2014; Act on Equality between Women and Men 609/1986; Criminal Code 39/1889; Occupational Health Care Act 1383/2001; Act on the Protection of Privacy in Working Life 759/2004; Act on Occupational Safety and Health Enforcement and Cooperation on Occupational Safety and Health at Workplaces 44/2006; ILO Recommendation No. 206.

VIII. APPLICATION IN PRACTICE

Please indicate in the box "application in practice" below whether courts of law or other tribunals have given decisions involving questions of principle relating to the application of the Convention. If so, please supply the text of these decisions.

Please give a general appreciation of the manner in which the Convention is applied in your country and supply – in so far as the information in question has not already been supplied in connection with other questions in this form – extracts of reports from the labour inspection and other enforcement and/or monitoring bodies, where such bodies exist, addressing violence and harassment in the world of work, and, where such statistics exist, information on the number of workers and other persons concerned covered by the measures giving effect to the Convention, disaggregated by sex and age, as well as the number and nature of cases dealt with and information on the sanctions imposed in practice (including on the number and types of sanctions handed down, and actually enforced) and the remedies granted.

Application in practice:

According to the overall assessment of SAK and STTK, Finnish legislation provides a formal basis for giving effect to Convention No. 190, but there are serious shortcomings in the application of Convention No. 190 in practice. The national legal system contains several central statutes through which violence and harassment in the world of work, discrimination, inappropriate treatment and labour exploitation can be prevented and addressed. This, however, does not yet guarantee workers an effective right to a world of work free from violence and harassment.

SAK and STTK nevertheless consider that the existence of formal regulation alone does not ensure the effective application of Convention No. 190 in practice. The purpose of Convention No. 190 is to secure for everyone the right to a world of work free from violence and harassment. This requires that workers have, in practice, effective means to identify their rights, report shortcomings, obtain support, have access to remedies and be protected against retaliation. Significant shortcomings remain in the Finnish system in these respects.

A central practical problem is the fragmented nature of the system. Situations involving violence and harassment in the world of work may simultaneously fall within the scope of the Occupational Safety and Health Act, the Non-discrimination Act, the Act on Equality between Women and Men, the Criminal Code, the Employment Contracts Act, occupational health care, occupational safety and health enforcement and victim support services. From the worker's perspective, it is not always clear which authority they should contact, which procedure applies to their situation, what evidence is required and what consequences the process may have. This weakens, in particular, the position of workers who already have more limited possibilities to exercise their rights.

SAK and STTK regard it as a particular shortcoming that remedies are often too burdensome, slow and risky. A victim of harassment, discrimination or inappropriate treatment may have to bear a significant psychological, financial and procedural burden. The risk of litigation costs, lengthy proceedings and uncertainty as to the outcome may prevent a worker from taking the matter forward. This is problematic from the perspective of Article 10 of Convention No. 190, which requires easy access to appropriate and effective remedies and safe, fair and effective reporting and dispute resolution mechanisms.

With regard to enforcement, SAK and STTK consider that the role of the occupational safety and health authorities is indispensable, but that the current resources and operating models are not sufficient to fully meet the objectives of Convention No. 190. Enforcement still relies too heavily on the individual worker's own initiative. This is problematic in situations involving violence, harassment, discrimination and labour exploitation, where the worker may fear retaliation, termination of employment, reduction of shifts, non-renewal of a fixed-term contract, jeopardizing a residence permit or stigmatization within the workplace community. SAK and STTK consider that enforcement must be more proactive, more risk-based and more frequently initiated by the authorities than at present.

In the assessment of SAK and STTK, shortcomings are particularly pronounced in respect of workers in situations of vulnerability. Migrant workers, posted workers, seasonal workers, temporary agency workers, part-time and fixed-term workers, young workers, workers with disabilities, workers belonging to gender and sexual minorities, platform workers and workers in low-paid and subcontracting-intensive sectors may be particularly exposed to violence, harassment, discrimination and exploitation. In respect of these groups, the realization of rights must not be left dependent on the worker's own initiative or capacity to bear risk.

Labour exploitation is a central issue for the application of Convention No. 190 in practice. Exploitation may take the form, inter alia, of underpayment, excessively long working days, denial of days off and annual leave, recovery of wages paid, unreasonable fees, threats, intimidation, deception, neglect of occupational safety and health measures and control over the worker. These phenomena may cause economic, psychological and physical harm to the worker and therefore form part of the relevant overall context for the objectives of Convention No. 190. SAK and STTK consider that combating labour exploitation must be linked more clearly than at present to the prevention of violence and harassment in the world of work.

As regards gender-based and sexual harassment, Finnish legislation contains clear definitions and establishes the employer's duty to act. In practice, however, the significant barriers to reporting remain. Shame, fear, dependency on the employer, pressure within the workplace community, the burdensome nature of the process and the risk of retaliation may prevent the victim from bringing the matter forward. SAK and STTK consider that gender-responsive, safe and effective procedures must be strengthened in all workplaces. Particular attention must be paid to intersectional discrimination and to situations in which the worker who is subjected to harassment is otherwise in a weak labour-market position.

SAK and STTK also consider the recognition of the effects of domestic violence in the world of work to be a significant area for development. Article 10(f) of Convention No. 190 requires Members to recognize the effects of domestic violence and, so far as is reasonably practicable, to mitigate its impact in the world of work, while Recommendation No. 206 provides guidance on measures that may be taken to that end. In Finland, workplaces do not yet have sufficient procedures for recognizing the effects of domestic violence on work ability, safety, absences, work arrangements and support for the worker. This is one of the clear shortcomings in the application of Convention No. 190 in practice.

As regards workplace-level procedures, SAK and STTK consider that the situation is uneven. Some workplaces have clear procedures for preventing and addressing violence, harassment and inappropriate treatment. In many workplaces, however, the instructions are too general, deficient, unknown to workers or ineffective in practice. The effective application of Convention No. 190 in practice requires that workplaces have concrete procedures for reporting, investigation, protection of the victim, prevention of retaliation, confidentiality and follow-up.

SAK and STTK consider that developments in working life in Finland over the past three years must be taken into account in the application of Convention No. 190 in practice. Restrictions on the right to take industrial action, the expansion of local bargaining, changes to the conciliation system, the easing of cooperation obligations and weakenings concerning employment security do not all directly concern violence and harassment, but they affect power relations in working life, workers' bargaining position and barriers to reporting. For this reason, the realization of Convention No. 190 cannot be assessed separately from broader labour-market developments.

From the perspective of Convention No. 190, what is decisive is whether national measures strengthen workers' ability to act collectively, to rely on the support of their representatives and to report shortcomings without fear of consequences. The prevention of violence and harassment in the world of work requires a functioning system of shop stewards and occupational safety and health representatives, a collective bargaining system, genuine cooperation and effective protection against retaliation.

SAK and STTK consider that Finland should strengthen the application of Convention No. 190 in practice through the following measures:

- strengthening the resources of occupational safety and health enforcement and enforcement initiated by the authorities,
- developing readily accessible and effective remedies,
- strengthening the competence and accessibility of the National Non-Discrimination and Equality Tribunal in matters concerning harassment and discrimination in working life,
- increasing the binding nature of workplace-level procedures against violence and harassment,
- safeguarding the participation of workers and their representatives,
- strengthening multilingual and accessible advice,
- recognizing the connection between labour exploitation and Convention No. 190,
- strengthening gender-responsive procedures and the recognition of intersectional discrimination,
- including the effects of domestic violence in the world of work in workplace procedures,
- effective application of the prohibition of retaliation in practice,
- improving the effectiveness, proportionality and dissuasiveness of sanctions,
- collecting statistical data disaggregated by forms of violence and harassment, sector, gender, age, form of work and groups in situations of vulnerability,
- establishing binding provisions on reporting channels,
- reducing the litigation-cost risk borne by victims and expediting judicial proceedings,
- regular tripartite monitoring of the application of Convention No. 190 in practice.

SAK and STTK consider that Finland does not yet have a sufficient overall picture of how different forms of violence and harassment manifest themselves in working life, in which sectors and forms of work the risks are greatest, how many cases come to the attention of the authorities, and what sanctions and remedies are realized in practice. In the practice of the

CEACR, the application of Convention No. 190 is assessed by reference to both law and practice. SAK and STTK consider that, in its subsequent reports, the Government should provide disaggregated information on inspections, reports, cases resolved, sanctions imposed and enforced, compensation and damages awarded, support measures for victims and preventive measures at workplace level. The information should, where possible, be disaggregated by sex, age, sector, form of work, origin, disability and other vulnerable status.

If courts of law or other judicial bodies have issued decisions concerning questions of principle relating to the application of Convention No. 190, these should be identified in the report. However, SAK and STTK are not aware, in this context, of decisions in which Convention No. 190 has been expressly applied or in which established case law concerning Convention No. 190 has developed. This does not mean that there is no case law concerning violence and harassment in working life, discrimination or occupational safety and health, but rather that the express application of Convention No. 190 in practice is still at an early stage in Finland.

SAK and STTK request the ILO supervisory bodies, in particular the CEACR and, insofar as freedom of association issues arise, the CFA, to give attention to the fact that compliance with the obligations under Convention No. 190 cannot be assessed solely on the basis of the formal existence of national regulation. What is decisive is whether national implementation, enforcement by public authorities, remedies, sanctions, workplace-level procedures and the operating conditions of workers and their representatives together ensure the effective application of Convention No. 190 in practice. SAK and STTK consider that the Government should be requested to provide disaggregated information on inspections, reports, cases resolved, sanctions imposed and enforced, compensation and damages awarded, support measures for victims and preventive measures at workplace level. The information should, where possible, be disaggregated by sex, age, sector, form of work, origin, disability and other vulnerable status. In addition, SAK and STTK consider that Finland needs to strengthen the accessibility of remedies, the resources and authority-initiated role of occupational safety and health enforcement, the protection of complainants and workers' representatives against retaliation, and the effective protection of workers in situations of vulnerability.

Finally, SAK and STTK wish, as workers' organizations, to reiterate the point made above:

The EU-funded EU Gender-based Violence Survey (2024) examined sexual harassment from the perspective of working life. The finding was that, in Finland, 54 per cent of women have experienced sexual harassment during their working life. This figure is the second highest in Europe.

SAK and STTK submit these observations as workers' organizations in order to complement the account provided in the Government's report on the application of Convention No. 190 in Finland.

Sources:

EU Gender-based Violence Survey (2024),

Government Proposal HE 89/2023 vp; Act on the International Labour Organization Convention concerning the elimination of violence and harassment in the world of work 257/2024; Government Decree 1028/2024; Occupational Safety and Health Act 738/2002; Employment Contracts Act 55/2001; Non-discrimination Act 1325/2014; Act on Equality between Women and Men 609/1986; Criminal Code 39/1889; Occupational Health Care Act 1383/2001; Act on Occupational Safety and Health Enforcement and Cooperation on Occupational Safety and Health at Workplaces 44/2006; Act on the Protection of Privacy in Working Life 759/2004; Occupational Safety and Health Administration, Supervision of harassment and other inappropriate treatment, Occupational Safety and Health Enforcement Guidelines 1/2023; Occupational Safety and Health Administration, Work-related exploitation; Report of the Ombudsman for Equality to Parliament 2022, K 1/2022 vp; Ombudsman for Equality, 5 June 2024, Sexual and gender-based harassment: the employer has a broad duty to act; Report of the Non-Discrimination Ombudsman to Parliament 2026, K 2/2026 vp; HEUNI, From Rights on Paper to Rights in Action, Report Series No. 109, 2024; HEUNI, Nordic Perspectives on Labour Exploitation, Report Series No. 111, 2025; Victim Support Finland, Work-related exploitation; Ministry of Economic Affairs and Employment, Action Plan against Labour Exploitation, 2024; ILO Recommendation No. 206, in particular Paragraphs 16–18 and 23–24.

Convention concerning the elimination of violence and harassment in the world of work, 2019 (No. 190)

PREAMBLE

The General Conference of the International Labour Organization,

Having been convened at Geneva by the Governing Body of the International Labour Office, and having met in its 108th (Centenary) Session on 10 June 2019, and

Recalling that the Declaration of Philadelphia affirms that all human beings, irrespective of race, creed or sex, have the right to pursue both their material well-being and their spiritual development in conditions of freedom and dignity, of economic security and equal opportunity, and

Reaffirming the relevance of the fundamental Conventions of the International Labour Organization, and

Recalling other relevant international instruments such as the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, the International Covenant on Economic, Social and Cultural Rights, the International Convention on the Elimination of All Forms of Racial Discrimination, the Convention on the Elimination of All Forms of Discrimination against Women, the International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families, and the Convention on the Rights of Persons with Disabilities, and

Recognizing the right of everyone to a world of work free from violence and harassment, including gender-based violence and harassment, and

Recognizing that violence and harassment in the world of work can constitute a human rights violation or abuse, and that violence and harassment is a threat to equal opportunities, is unacceptable and incompatible with decent work, and

Recognizing the importance of a work culture based on mutual respect and dignity of the human being to prevent violence and harassment, and

Recalling that Members have an important responsibility to promote a general environment of zero tolerance to violence and harassment in order to facilitate the prevention of such behaviours and practices, and that all actors in the world of work must refrain from, prevent and address violence and harassment, and

Acknowledging that violence and harassment in the world of work affects a person's psychological, physical and sexual health, dignity, and family and social environment, and

Recognizing that violence and harassment also affects the quality of public and private services, and may prevent persons, particularly women, from accessing, and remaining and advancing in the labour market, and

Noting that violence and harassment is incompatible with the promotion of sustainable enterprises and impacts negatively on the organization of work, workplace relations, worker engagement, enterprise reputation, and productivity, and

Acknowledging that gender-based violence and harassment disproportionately affects women and girls, and recognizing that an inclusive, integrated and gender-responsive approach, which tackles underlying causes and risk factors, including gender stereotypes, multiple and intersecting forms of discrimination, and unequal gender-based power relations, is essential to ending violence and harassment in the world of work, and

Noting that domestic violence can affect employment, productivity and health and safety, and that governments, employers' and workers' organizations and labour market institutions can help, as part of other measures, to recognize, respond to and address the impacts of domestic violence, and

Having decided upon the adoption of certain proposals concerning violence and harassment in the world of work, which is the fifth item on the agenda of the session, and

Having determined that these proposals shall take the form of an international Convention, adopts this twenty-first day of June of the year two thousand and nineteen the following Convention, which may be cited as the Violence and Harassment Convention, 2019:

I. DEFINITIONS

Article 1

1. For the purpose of this Convention:

- (a) the term "violence and harassment" in the world of work refers to a range of unacceptable behaviours and practices, or threats thereof, whether a single occurrence or repeated, that aim at, result in, or are likely to result in physical, psychological, sexual or economic harm, and includes gender-based violence and harassment;
- (b) the term "gender-based violence and harassment" means violence and harassment directed at persons because of their sex or gender, or affecting persons of a particular sex or gender disproportionately, and includes sexual harassment.

2. Without prejudice to subparagraphs (a) and (b) of paragraph 1 of this Article, definitions in national laws and regulations may provide for a single concept or separate concepts.

II. SCOPE

Article 2

1. This Convention protects workers and other persons in the world of work, including employees as defined by national law and practice, as well as persons working irrespective of their contractual status, persons in training, including interns and apprentices, workers whose employment has been terminated, volunteers, jobseekers and job applicants, and individuals exercising the authority, duties or responsibilities of an employer.

2. This Convention applies to all sectors, whether private or public, both in the formal and informal economy, and whether in urban or rural areas.

Article 3

This Convention applies to violence and harassment in the world of work occurring in the course of, linked with or arising out of work:

- (a) in the workplace, including public and private spaces where they are a place of work;
- (b) in places where the worker is paid, takes a rest break or a meal, or uses sanitary, washing and changing facilities;
- (c) during work-related trips, travel, training, events or social activities;
- (d) through work-related communications, including those enabled by information and communication technologies;
- (e) in employer-provided accommodation; and
- (f) when commuting to and from work.

III. CORE PRINCIPLES

Article 4

1. Each Member which ratifies this Convention shall respect, promote and realize the right of everyone to a world of work free from violence and harassment.

2. Each Member shall adopt, in accordance with national law and circumstances and in consultation with representative employers' and workers' organizations, an inclusive, integrated and gender-responsive approach for the prevention and elimination of violence and harassment in the world of work. Such an approach should take into account violence and harassment involving third parties, where applicable, and includes:

- (a) prohibiting in law violence and harassment;
- (b) ensuring that relevant policies address violence and harassment;
- (c) adopting a comprehensive strategy in order to implement measures to prevent and combat violence and harassment;
- (d) establishing or strengthening enforcement and monitoring mechanisms;
- (e) ensuring access to remedies and support for victims;
- (f) providing for sanctions;
- (g) developing tools, guidance, education and training, and raising awareness, in accessible formats as appropriate; and
- (h) ensuring effective means of inspection and investigation of cases of violence and harassment, including through labour inspectorates or other competent bodies.

3. In adopting and implementing the approach referred to in paragraph 2 of this Article, each Member shall recognize the different and complementary roles and functions of governments, and employers and workers and their respective organizations, taking into account the varying nature and extent of their respective responsibilities.

Article 5

With a view to preventing and eliminating violence and harassment in the world of work, each Member shall respect, promote and realize the fundamental principles and rights at work, namely freedom of association and the effective recognition of the right to collective bargaining, the elimination of all forms of forced or compulsory labour, the effective abolition of child labour and the elimination of discrimination in respect of employment and occupation, as well as promote decent work.

Article 6

Each Member shall adopt laws, regulations and policies ensuring the right to equality and non-discrimination in employment and occupation, including for women workers, as well as for workers and other persons belonging to one or more vulnerable groups or groups in situations of vulnerability that are disproportionately affected by violence and harassment in the world of work.

IV. PROTECTION AND PREVENTION

Article 7

Without prejudice to and consistent with Article 1, each Member shall adopt laws and regulations to define and prohibit violence and harassment in the world of work, including gender-based violence and harassment.

Article 8

Each Member shall take appropriate measures to prevent violence and harassment in the world of

work, including:

- (a) recognizing the important role of public authorities in the case of informal economy workers;
- (b) identifying, in consultation with the employers' and workers' organizations concerned and through other means, the sectors or occupations and work arrangements in which workers and other persons concerned are more exposed to violence and harassment; and
- (c) taking measures to effectively protect such persons.

Article 9

Each Member shall adopt laws and regulations requiring employers to take appropriate steps commensurate with their degree of control to prevent violence and harassment in the world of work, including gender-based violence and harassment, and in particular, so far as is reasonably practicable, to:

- (a) adopt and implement, in consultation with workers and their representatives, a workplace policy on violence and harassment;
- (b) take into account violence and harassment and associated psychosocial risks in the management of occupational safety and health;
- (c) identify hazards and assess the risks of violence and harassment, with the participation of workers and their representatives, and take measures to prevent and control them; and
- (d) provide to workers and other persons concerned information and training, in accessible formats as appropriate, on the identified hazards and risks of violence and harassment and the associated prevention and protection measures, including on the rights and responsibilities of workers and other persons concerned in relation to the policy referred to in subparagraph (a) of this Article.

V. ENFORCEMENT AND REMEDIES

Article 10

Each Member shall take appropriate measures to:

- (a) monitor and enforce national laws and regulations regarding violence and harassment in the
- (b) world of work;
 - (i) ensure easy access to appropriate and effective remedies and safe, fair and effective reporting and dispute resolution mechanisms and procedures in cases of violence and harassment in the world of work, such as:
 - (ii) complaint and investigation procedures, as well as, where appropriate, dispute resolution mechanisms at the workplace level;
 - (iii) dispute resolution mechanisms external to the workplace;
 - (iv) courts or tribunals;
 - (v) protection against victimization of or retaliation against complainants, victims, witnesses and whistle-blowers; and
 - (vi) legal, social, medical and administrative support measures for complainants and victims;
- (c) protect the privacy of those individuals involved and confidentiality, to the extent possible and as appropriate, and ensure that requirements for privacy and confidentiality are not misused;
- (d) provide for sanctions, where appropriate, in cases of violence and harassment in the world of work;
- (e) provide that victims of gender-based violence and harassment in the world of work have effective access to gender-responsive, safe and effective complaint and dispute resolution mechanisms, support, services and remedies;
- (f) recognize the effects of domestic violence and, so far as is reasonably practicable, mitigate its impact in the world of work;

- (g) ensure that workers have the right to remove themselves from a work situation which they have reasonable justification to believe presents an imminent and serious danger to life, health or safety due to violence and harassment, without suffering retaliation or other undue consequences, and the duty to inform management; and
- (h) ensure that labour inspectorates and other relevant authorities, as appropriate, are empowered to deal with violence and harassment in the world of work, including by issuing orders requiring measures with immediate executory force, and orders to stop work in cases of an imminent danger to life, health or safety, subject to any right of appeal to a judicial or administrative authority which may be provided by law.

VI. GUIDANCE, TRAINING AND AWARENESS-RAISING

Article 11

Each Member, in consultation with representative employers' and workers' organizations, shall seek to ensure that:

- (a) violence and harassment in the world of work is addressed in relevant national policies, such as those concerning occupational safety and health, equality and non-discrimination, and migration;
- (b) employers and workers and their organizations, and relevant authorities, are provided with guidance, resources, training or other tools, in accessible formats as appropriate, on violence and harassment in the world of work, including on gender-based violence and harassment; and
- (c) initiatives, including awareness-raising campaigns, are undertaken.

VII. METHODS OF APPLICATION

Article 12

The provisions of this Convention shall be applied by means of national laws and regulations, as well as through collective agreements or other measures consistent with national practice, including by extending or adapting existing occupational safety and health measures to cover violence and harassment and developing specific measures where necessary.

VIII. FINAL PROVISIONS

Article 13

The formal ratifications of this Convention shall be communicated to the Director-General of the International Labour Office for registration.

Article 14

1. This Convention shall be binding only upon those Members of the International Labour Organization whose ratifications have been registered with the Director-General of the International Labour Office.
2. It shall come into force twelve months after the date on which the ratifications of two Members have been registered with the Director-General.
3. Thereafter, this Convention shall come into force for any Member twelve months after the date on which its ratification is registered.

Article 15

1. A Member which has ratified this Convention may denounce it after the expiration of ten years from the date on which the Convention first comes into force, by an act communicated to the Director-General of the International Labour Office for registration. Such denunciation shall not take effect until one year after the date on which it is registered.
2. Each Member which has ratified this Convention and which does not, within the year

following the expiration of the period of ten years mentioned in the preceding paragraph, exercise the right of denunciation provided for in this Article, will be bound for another period of ten years and, thereafter, may denounce this Convention within the first year of each new period of ten years under the terms provided for in this Article.

Article 16

1. The Director-General of the International Labour Office shall notify all Members of the International Labour Organization of the registration of all ratifications and denunciations that have been communicated by the Members of the Organization.

2. When notifying the Members of the Organization of the registration of the second ratification that has been communicated, the Director-General shall draw the attention of the Members of the Organization to the date upon which the Convention will come into force.

Article 17

The Director-General of the International Labour Office shall communicate to the Secretary-General of the United Nations for registration in accordance with Article 102 of the Charter of the United Nations full particulars of all ratifications and denunciations that have been registered in accordance with the provisions of the preceding Articles.

Article 18

At such times as it may consider necessary, the Governing Body of the International Labour Office shall present to the General Conference a report on the working of this Convention and shall examine the desirability of placing on the agenda of the Conference the question of its revision in whole or in part.

Article 19

1. Should the Conference adopt a new Convention revising this Convention, then, unless the new Convention otherwise provides:

- (a) the ratification by a Member of the new revising Convention shall ipso jure involve the immediate denunciation of this Convention, notwithstanding the provisions of Article 15 above, if and when the new revising Convention shall have come into force;
- (b) as from the date when the new revising Convention comes into force, this Convention shall cease to be open to ratification by the Members.

2. This Convention shall in any case remain in force in its actual form and content for those Members which have ratified it but have not ratified the revising Convention.

Article 20

The English and French versions of the text of this Convention are equally authoritative.

Recommendation concerning the elimination of violence and harassment in the world of work, 2019 (No. 206)

PREAMBLE

The General Conference of the International Labour Organization,
Having been convened at Geneva by the Governing Body of the International Labour Office, and
having met in its 108th (Centenary) Session on 10 June 2019, and
Having adopted the Violence and Harassment Convention, 2019, and
Having decided upon the adoption of certain proposals concerning violence and harassment in the world of work, which is the fifth item on the agenda of the session, and
Having determined that these proposals shall take the form of a Recommendation supplementing the Violence and Harassment Convention, 2019,
adopts this twenty-first day of June of the year two thousand and nineteen the following Recommendation, which may be cited as the Violence and Harassment Recommendation, 2019:

1. The provisions of this Recommendation supplement those of the Violence and Harassment Convention, 2019 (hereafter referred to as “the Convention”), and should be considered in conjunction with them.

I. CORE PRINCIPLES

2. In adopting and implementing the inclusive, integrated and gender responsive approach referred to in Article 4, paragraph 2, of the Convention, Members should address violence and harassment in the world of work in labour and employment, occupational safety and health, equality and non-discrimination law, and in criminal law, where appropriate.

3. Members should ensure that all workers and employers, including those in sectors, occupations and work arrangements that are more exposed to violence and harassment, fully enjoy freedom of association and the effective recognition of the right to collective bargaining consistent with the Freedom of Association and Protection of the Right to Organise Convention, 1948 (No. 87), and the Right to Organise and Collective Bargaining Convention, 1949 (No. 98).

4. Members should take appropriate measures to:

- (a) promote the effective recognition of the right to collective bargaining at all levels as a means of preventing and addressing violence and harassment and, to the extent possible, mitigating the impact of domestic violence in the world of work; and
- (b) support such collective bargaining through the collection and dissemination of information on related trends and good practices regarding the negotiation process and the content of collective agreements.

5. Members should ensure that provisions on violence and harassment in national laws, regulations and policies take into account the equality and non-discrimination instruments of the International Labour Organization, including the Equal Remuneration Convention (No. 100) and Recommendation (No. 90), 1951, and the Discrimination (Employment and Occupation) Convention (No. 111) and Recommendation (No. 111), 1958, and other relevant instruments.

II. PROTECTION AND PREVENTION

6. Occupational safety and health provisions on violence and harassment in national laws, regulations and policies should take into account relevant occupational safety and health instruments of the International Labour Organization, such as the Occupational Safety and Health Convention, 1981 (No. 155), and the Promotional Framework for Occupational Safety and Health Convention, 2006 (No. 187).

7. Members should, as appropriate, specify in laws and regulations that workers and their representatives should take part in the design, implementation and monitoring of the workplace policy referred to in Article 9(a) of the Convention, and such policy should:

- (a) state that violence and harassment will not be tolerated;
- (b) establish violence and harassment prevention programmes with, if appropriate, measurable objectives;
- (c) specify the rights and responsibilities of the workers and the employer;
- (d) contain information on complaint and investigation procedures;
- (e) provide that all internal and external communications related to incidents of violence and harassment will be duly considered, and acted upon as appropriate;
- (f) specify the right to privacy of individuals and confidentiality, as referred to in Article 10(c) of the Convention, while balancing the right of workers to be made aware of all hazards; and
- (g) include measures to protect complainants, victims, witnesses and whistle-blowers against victimization or retaliation.

8. The workplace risk assessment referred to in Article 9(c) of the Convention should take into account factors that increase the likelihood of violence and harassment, including psychosocial hazards and risks. Particular attention should be paid to the hazards and risks that:

- (a) arise from working conditions and arrangements, work organization and human resource management, as appropriate;
- (b) involve third parties such as clients, customers, service providers, users, patients and members of the public; and
- (c) arise from discrimination, abuse of power relations, and gender, cultural and social norms that support violence and harassment.

9. Members should adopt appropriate measures for sectors or occupations and work arrangements in which exposure to violence and harassment may be more likely, such as night work, work in isolation, health, hospitality, social services, emergency services, domestic work, transport, education or entertainment.

10. Members should take legislative or other measures to protect migrant workers, particularly women migrant workers, regardless of migrant status, in origin, transit and destination countries as appropriate, from violence and harassment in the world of work.

11. In facilitating the transition from the informal to the formal economy, Members should provide resources and assistance for informal economy workers and employers, and their associations, to prevent and address violence and harassment in the informal economy.

12. Members should ensure that measures to prevent violence and harassment do not result in the restriction of the participation in specific jobs, sectors or occupations, or their exclusion therefrom, of women and the groups referred to in Article 6 of the Convention.

13. The reference to vulnerable groups and groups in situations of vulnerability in Article 6 of the Convention should be interpreted in accordance with applicable international labour standards and international instruments on human rights.

III. ENFORCEMENT, REMEDIES AND ASSISTANCE

14. The remedies referred to in Article 10(b) of the Convention could include:

- (a) the right to resign with compensation;
- (b) reinstatement;
- (c) appropriate compensation for damages;
- (d) orders requiring measures with immediate executory force to be taken to ensure that certain conduct is stopped or that policies or practices are changed; and
- (e) legal fees and costs according to national law and practice.

15. Victims of violence and harassment in the world of work should have access to compensation in cases of psychosocial, physical or any other injury or illness which results in incapacity to work.

16. The complaint and dispute resolution mechanisms for gender-based violence and harassment referred to in Article 10(e) of the Convention should include measures such as:

- (a) courts with expertise in cases of gender-based violence and harassment;
- (b) timely and efficient processing;
- (c) legal advice and assistance for complainants and victims;
- (d) guides and other information resources available and accessible in the languages that are widely spoken in the country; and
- (e) shifting of the burden of proof, as appropriate, in proceedings other than criminal proceedings.

17. The support, services and remedies for victims of gender-based violence and harassment referred to in Article 10(e) of the Convention should include measures such as:

- (a) support to help victims re-enter the labour market;
- (b) counselling and information services, in an accessible manner as appropriate;
- (c) 24-hour hotlines;
- (d) emergency services;
- (e) medical care and treatment and psychological support;
- (f) crisis centres, including shelters; and
- (g) specialized police units or specially trained officers to support victims.

18. Appropriate measures to mitigate the impacts of domestic violence in the world of work referred to in Article 10(f) of the Convention could include:

- (a) leave for victims of domestic violence;
- (b) flexible work arrangements and protection for victims of domestic violence;
- (c) temporary protection against dismissal for victims of domestic violence, as appropriate, except on grounds unrelated to domestic violence and its consequences;
- (d) the inclusion of domestic violence in workplace risk assessments;
- (e) a referral system to public mitigation measures for domestic violence, where they exist; and
- (f) awareness-raising about the effects of domestic violence.

19. Perpetrators of violence and harassment in the world of work should be held accountable and provided counselling or other measures, where appropriate, with a view to preventing the reoccurrence of violence and harassment, and facilitating their reintegration into work, where appropriate.

20. Labour inspectors and officials of other competent authorities, as appropriate, should undergo gender-responsive training with a view to identifying and addressing violence and harassment in the world of work, including psychosocial hazards and risks, gender-based violence and

harassment, and discrimination against particular groups of workers.

21. The mandate of national bodies responsible for labour inspection, occupational safety and health, and equality and non-discrimination, including gender equality, should cover violence and harassment in the world of work.

22. Members should make efforts to collect and publish statistics on violence and harassment in the world of work disaggregated by sex, form of violence and harassment, and sector of economic activity, including with respect to the groups referred to in Article 6 of the Convention.

IV. GUIDANCE, TRAINING AND AWARENESS-RAISING

23. Members should fund, develop, implement and disseminate, as appropriate:

- (a) programmes aimed at addressing factors that increase the likelihood of violence and harassment in the world of work, including discrimination, the abuse of power relations, and gender, cultural and social norms that support violence and harassment;
- (b) gender-responsive guidelines and training programmes to assist judges, labour inspectors, police officers, prosecutors and other public officials in fulfilling their mandate regarding violence and harassment in the world of work, as well as to assist public and private employers and workers and their organizations in preventing and addressing violence and harassment in the world of work;
- (c) model codes of practice and risk assessment tools on violence and harassment in the world of work, either general or sector-specific, taking into account the specific situations of workers and other persons belonging to the groups referred to in Article 6 of the Convention;
- (d) public awareness-raising campaigns in the various languages of the country, including those of the migrant workers residing in the country, that convey the unacceptability of violence and harassment, in particular gender-based violence and harassment, address discriminatory attitudes and prevent stigmatization of victims, complainants, witnesses and whistle-blowers;
- (e) gender-responsive curricula and instructional materials on violence and harassment, including gender-based violence and harassment, at all levels of education and vocational training, in line with national law and circumstances;
- (f) materials for journalists and other media personnel on gender-based violence and harassment, including its underlying causes and risk factors, with due respect for their independence and freedom of expression; and
- (g) public campaigns aimed at fostering safe, healthy and harmonious workplaces free from violence and harassment.