

STRATEGY PAPER

NO-ONE LEFT BEHIND

THE COMMUTE:
SAFE TRANSPORT TO AND FROM
WORK FOR TRANSPORT WORKERS



ITF

THE INTERNATIONAL TRANSPORT WORKERS' FEDERATION (ITF) IS A DEMOCRATIC, AFFILIATE-LED FEDERATION RECOGNISED AS THE WORLD'S LEADING TRANSPORT AUTHORITY. WE FIGHT PASSIONATELY TO IMPROVE WORKERS' LIVES, CONNECTING MORE THAN 730 AFFILIATED TRADE UNIONS FROM OVER 150 COUNTRIES TO SECURE RIGHTS, EQUALITY AND JUSTICE FOR WORKERS GLOBALLY. WE ARE THE VOICE FOR MORE THAN 16.5 MILLION TRANSPORT WORKERS ACROSS THE WORLD.

This paper was prepared for the ITF women transport workers' committee by external consultant and OSH (occupational safety and health) expert, Susan Murray, in consultation with the ITF sections and affiliates.

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Cover image:

A woman sitting on a bus looking out the window, Athens, Greece. Source: Unsplash, Fotis Fotopoulos

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**THE RECOGNITION
OF THE **COMMUTE**
AS INTEGRAL
TO THE WORLD
OF WORK WAS A
MAJOR POSITIVE
SHIFT TOWARDS
IMPROVED
PROTECTIONS
FOR WORKERS.**

FOREWORD

“On a public holiday I arrived half an hour late because there were no taxis available that day and they summoned me to a disciplinary process. Now I’ve had to ride my bike at 3am in a city where they kill you for a cell phone. I must go out and risk my life to try to get to my job quickly.”

Woman bus rapid transit ticket seller, Colombia¹

This worker's experience from Colombia goes to the heart of why the commute is an issue of grave concern for transport workers, who face a number of health and safety hazards while travelling to and from work, wherever they work in the transport industry. Little or no attention is paid to the safety of transport workers who have to commute to get to work. This must change.

The recognition of the commute as integral to the world of work for the purposes of the International Labour Organization (ILO) 2019 Violence and Harassment Convention No. 190 (C190) was a major positive shift towards improved protections for workers.

While the inclusion of the commute in the scope of C190 should be celebrated, it must also be actively pursued into implementing legislation, policy and collective bargaining agreements at the national and local level.

The expanded scope follows an increasing number of examples of national state practice taking the commute into account to better meet worker realities of where violence and harassment occurs.²

Building on joint work on C190 with other Global Union Federations, the International Transport Workers' Federation (ITF) published the C190 Transport Workers' Toolkit, including a briefing on the commute, to support transport workers taking action to prevent violence and harassment in the world of work. Even though women workers are more at risk from gender-based violence and harassment, it impacts all workers and a holistic approach is crucial to strengthen this work.

Therefore, **NO-ONE LEFT BEHIND** takes this further and sets the scene to develop the ITF's work programme for safe and healthy commuting for all transport workers.

Violence and harassment at work is an evident safety concern for transport workers and a vital occupational safety and health (OSH) issue. The world of work clearly cannot be safe without the absence of violence and harassment; much more is needed to ensure a holistically safe and healthy working environment.

Comprehensive OSH protections should also go beyond an outdated understanding of a physical plane of the workplace in order to



A woman mechanic and her teacher fix the engine of a rickshaw, Somalia. Source: ITF

cover the broader world of work, including the right to a safe commute. This would better reflect the modern realities of worker issues and increasingly relevant risks.

Commuting to and from work typically accounts for one-third of the trips made in cities.³ The ITF and its affiliates are already organising to secure safe, accessible, and affordable public transport as a priority, to ensure the right to mobility for all and to enable transport workers to remain in work, as well as for a managed and just transition from informal to formal public transport provision. Safe commuting for all transport workers alongside prioritising decent and affordable housing for transport workers convenient for their workplaces (to minimise the need to commute) are key campaigning issues, especially for women transport workers.

We demand that all workplaces introduce and implement strong holistic OSH regimes for all transport workers and integrate a gender transformative approach, including gender-based risk assessments for commuting to and from work.

This strategy paper is guided by the lived experiences, stories and invisible challenges of transport workers globally. With that

foundation, the paper looks at a practical and yet transformative approach to the commute as an occupational health and safety issue.

It establishes what the ITF means by the commute, recognising the complexities of the transport sector, and includes calls for action for different actors who have duties and/or interests in securing safe commuting for all, including those who have responsibilities for urban planning and public transportation planning and implementation:

- International financial institutions.
- National governments.
- Municipalities and local transportation authorities.
- Employers.

Trade unions working alongside these actors, and others such as employers' organisations, passenger groups, community groups and campaigners, public transport, housing and urban planning campaigners, women's/ gender rights groups, safety campaigners and disability⁴ activists – is crucial to success.

Please share your bargaining and campaigning successes to help take forward safe and healthy commuting for transport workers!

Contact: women@itf.org.uk

DEFINITIONS

C40

A global network of mayors of the world's leading cities that are united in action to confront the climate crisis.

CONVENTION (ILO)

An international agreement made between tripartite (government, employer, worker) representatives at the United Nations' International Labour Organization (ILO). Conventions may be ratified by ILO member states and become legally binding for that state, while the ten fundamental conventions of the ILO are considered to be binding on all its state members. ILO Conventions cover a wide area of social and labour issues including basic human rights, minimum wages, industrial relations, employment policy, occupational safety and health, social dialogue, social security, and violence and harassment in the world of work (Violence and Harassment Convention 2019, No.190 abbreviated to C190 in this document).

DECENT WORK

The United Nations Committee on Economic, Social and Cultural Rights has defined decent work as work that respects the rights of the human person as well as the rights of workers in terms of conditions of work, safety and remuneration. It provides an income allowing workers to support themselves and their families. These fundamental rights also include respect for the physical and mental integrity of the worker in the exercise of his/her employment. Decent work is also part of the Sustainable Development Agenda⁵ (Goal 8)⁶.

EMPLOYER

A term that has been traditionally used to describe an individual or organisation who engages others to work for them as formal employees. In this document the term

'employer' is also used to describe others who determine livelihoods and working conditions in informal work and non-standard forms of employment.

GENDER

The range of characteristics that a society defines as being masculine or feminine which determine roles, behaviours, constraints and opportunities associated with being male or female. It describes what is acceptable and expected of men and women in a particular culture, at a given time.

GENDER-DISAGGREGATED DATA

Data collected separately on men and women.

GENDER-BASED VIOLENCE AND HARASSMENT

Violence and harassment directed at persons because of their sex or gender or affecting persons of a particular sex or gender disproportionately. It includes sexual harassment.

GENDER-RESPONSIVE

Policy or practice which considers gender norms, roles and relations, and includes specific action to reduce gender inequality.

GENDER-TRANSFORMATIVE

Policy or practice which identifies underlying deep-rooted inequalities between women and men, and which empowers individuals to champion gender equality and challenge all forms of structural oppression and violence, and builds sustainable measures to transform gendered structures and systems.

GLOBAL UNION FEDERATIONS

International federations of national trade unions organising in a specific industry, sector or occupational group. The ITF is a global union federation.

IFI SAFEGUARDS

International Finance Institutions have 'safeguards' that set out the basic protective standards that have to be met by borrowers to receive funding.

INTERNATIONAL LABOUR ORGANIZATION (ILO)

The ILO is the only tripartite United Nations agency. Since 1919 the ILO has brought together governments, employers and workers of 187 Member States to set labour standards, develop policies and devise programmes promoting decent work for all women and men.

PLATFORM WORKER

A worker using an online platform to provide services in exchange for payment. Online platforms act as intermediaries that connect and control information between producers, distributors, employers, workers and consumers.

POSTED WORKER

Under the European Union's Posting of Workers Directive a 'posted worker' is an employee sent by their employer to carry out a service in another EU Member State on a temporary basis.

PROTOCOL

In the context of the ILO a Protocol is a procedural device for adding extra flexibility to an ILO Convention or for extending a Convention's obligations. ILO Protocols are also international treaties but do not exist independently since they are always linked to a Convention.

PSYCHOSOCIAL HAZARD/RISK

Anything in the design, management or organisation of work that could result in negative psychological, physical and social outcomes, such as work-related stress, violence and harassment.

RATIFICATION/RATIFY

When a government formally agrees to put the contents of a standard agreed at an international level into national law and practice, and it becomes binding (obligatory) for that state.

RECOMMENDATION (ILO)

Non-binding guidelines which give important guidance to governments and are important tools for campaigns and negotiations. Recommendations often give more detail on how to achieve outcomes required by a particular (related) convention.

RISK ASSESSMENT

A careful examination of what, in the world of work, could cause harm to people. It enables a weighing up of whether enough precautions are in place or whether more should be done to prevent harm to those at risk, including workers and members of the public.

SYSTEMIC EXCLUSION OF WOMEN FROM DECENT JOBS

Inequality in the allocation of women and men across different job categories. It can be horizontal (under/overrepresentation of women in a sector) or vertical (under/overrepresentation of women in certain roles/pay grades/levels of responsibility/work tasks).

THIRD PARTIES

Not an employer, manager or co-worker. This includes customers, clients, passengers, patients, business contacts, service providers, service users, members of the public, authorities, and vehicle owners.

TRANSPORT BUYER

A company that has a contractual relationship with a transport supplier for the provision of its services. Transport buyers have growing legal obligations to check and fix standards in their supply chain. Their purchasing power and/or control over data can give them influence over transport workers' conditions

moving their goods or passengers, despite not employing these workers directly. These companies are referred to as economic employers, cargo owners, customers, clients, charterers, consignors and consignees in different contexts.

VIOLENCE AND HARASSMENT

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. (C190, Article 1).

WORKPLACE

Any premises, or part of premises, which are not domestic premises and are made available to any person as a place of work, including public or private spaces where they are a place of work. This includes any place to which such person has access or is required to be while at

work; vehicles used in the course of the work, whether or not at the employer's premises; any room, lobby, corridor, staircase, road or other place used as a means of access to or egress from that place of work; and any place where welfare or sanitary facilities are provided for use in connection with the work.

WORLD OF WORK

This term has a broader scope than 'workplace' and includes all activities 'in the course of, linked with, or arising out of work'. This is important for transport workers and informal workers because it also includes public spaces and private spaces, places where workers are paid, take rest breaks or meals, or use sanitary, washing and changing facilities; work-related trips, travel, training, events or social activities; work-related communications; in employer-provided accommodation; and when commuting to and from work.



Bus Passenger, Rome, Italy. Source: Unsplash, Gabriella Marino

ABBREVIATIONS

ACV-CSC	Algemeen Christelijk Vakverbond – Confédération des Syndicats Chrétiens (Belgium)
AMOSUP	Associated Marine Officers' and Seamen's Union of the Philippines
CBA	Collective Bargaining Agreement
CEACR	Committee of Experts on the Application of Conventions and Recommendations (ILO)
ESIA	Environmental and Social Impact Assessment
ETF	European Transport Workers' Federation
EU	European Union
HRDD	Human Rights Due Diligence
IFI	International Financial Institution
ILO	International Labour Organization
ILWU	International Longshore and Warehousing Union (Canada)
ITUC	International Trade Union Confederation
MLC	Maritime Labour Convention
NGO	Non-Governmental Organisation
NSFE	Non-Standard Forms of Employment
NUSI	National Union of Seafarers of India
OSH	Occupational Safety and Health
SNTT	Sindicato Nacional de Trabajadores de Rama, Servicios de la Industria del Transporte y Logística de Colombia
TGWU	Transport and General Workers' Union, Zimbabwe
UN	United Nations
UNGPs	United Nations Guiding Principles on Business and Human Rights

WHAT DO WE MEAN BY ‘THE COMMUTE’?

“We are often ridiculed for saying ‘no’ to night duties or late-night shifts, but what we are saying ‘no’ to is the unsafe work situations that put us at risk of violence. We [women transport workers] have no issues with night duties, as long as we are as safe as men, and not molested and groped on our way back home from work.”

Woman transport worker, India⁷

The Commute is defined in ILO norms (see Protocol of 2002 to Convention 155 [P155]) as the direct way between the place of work and either: (i) the worker’s home [principal or secondary residence]; (ii) the place where the worker usually takes a meal; or (iii) the place where the worker usually receives their remuneration.

This definition is set out in relation to fundamental ILO convention on OSH C155 of 1981, but in the specific and potentially limited context of a ‘commuting accident’.

Further, the nature of work is changing. Informal and non-standard forms of employment are increasingly prevalent and the definition of the workplace or the ‘world of work’ is more complex (as can be seen in the broader definition achieved in C190). As the understanding of the workplace evolves, the concept of the “commute” becomes less clear. This has always been the reality for transport workers.

Core ILO Convention 155 on OSH:

- **Applies “in the working environment”**
- **Lists “workplace” and “the working environment” separately (art 5[a])**
- **“Workplace” covers all places a worker needs to go by reason of their work, which are under the direct or indirect control of the employer (art 3[c])**
- **“Working environment” is broader than “workplace”**
- **Description of the working environment as “arising out of, linked with or occurring in the course of work”**

For transport workers, particularly mobile transport workers, the line between workplace and commute may seem to be blurred because many transport workers are on the move as part of their job.



Passenger and ticket controller, Dakar, Senegal. Source: ITF

A broader understanding of the commute only where this increases protection for transport workers:

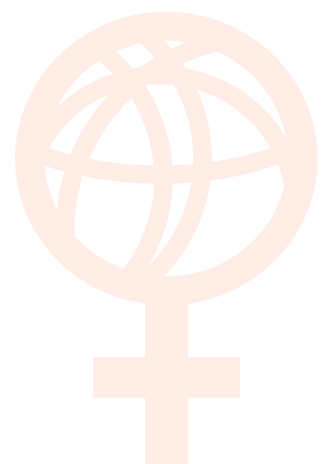
According to International Labour Standards, wherever the worker is in the working environment, the worker already has full OSH rights and protections.

Due to the atypical nature of much transport work, the working environment for some transport workers – for example those working on public transport – may extend into a context which, for a non-transport worker, might look like the commute. The ITF interprets the transport “working environment” broadly and inclusively for greatest worker protection.

In other transport workplaces, the complicated circumstances of the work itself means (at least some of) the commute has already been formally incorporated, by law, agreement or otherwise accepted, into the working environment. This is often when transport work takes place over an extended period during which the worker lives at work, for example when seafarers “ship out” for many months and remain in an environment controlled by the employer.

Due to various and particular risks experienced by transport workers across the board, we argue OSH protections must accompany transport workers on their way home.

The broad understanding of the “commute” in this paper aims to increase and make OSH protections more comprehensive for transport workers. Transport workers have highest OSH protections when “at work”. Nothing in this paper should be understood to “downgrade” what is already protected as the transport workers’ working environment or workplace broadly understood, to be interpreted instead as the commute.





Cabin crew who are away on assignment from their home, or “base”, country where they are employed, are to be considered as at work, even during off-duty hours between shifts where the employer has no involvement in how staff spend this time in the host country.

Case law in the United States of America (USA),^[1] for example, has found that a sexual assault that occurred in cabin crew's hotel accommodation, booked and paid for by the employer, during a brief layover in another country could be considered a part of that airline crew's **work environment**. The circumstances were held to be very different to when stationary employees go home at the close of their normal workday.

Airlines generally provide transportation between the airport and hotel accommodation, which would also be part of this continuous work environment.

The “commute” for cabin crew would then be limited to the journeys between going on- and off-duty at their “base” airport and their place of residence.



Seafarers mostly live and work in isolation and confinement on board a vessel fully controlled by their employer for the duration of their contract. The industry relies on a system of exploitation of unfair labour competition that sources seafarers from countries with low costs of living, meaning that ship owners profit from bringing seafarers from across the world to join a ship even while being responsible for this cost.

The Maritime Labour Convention (MLC) requires the employer to repatriate seafarers^[2], meaning arranging their return to their home country when their contracts expire and at no

cost to the seafarer. Arranging for a return to a seafaring ‘hub’ in the home country is common practice and compliant with this international law.

Under ITF-approved collective bargaining agreements (CBAs), the place of embarkation/repatriation is to be agreed, but is either the seafarer's home, a place of original engagement or of substantial connection. But importantly, it is to be agreed on signing the contract. The employer is responsible for any disability or death caused by an accident or any cause “whilst in the employment of the company including... *whilst travelling to and from the vessel*”. The needs and reasonable requirements for comfort are to be considered and costs covered include travel, subsistence costs and wages during that time. The employer's legal responsibility and the **work environment** effectively continues.

Unfortunately, failure to repatriate, known as the “abandonment” of seafarers by ship owners on their vessels, often without food, fuel, or pay, is all too common. The ITF has reported and resolved cases where seafarers have been trapped on board for years. Extreme restriction of movement such as this can be a direct indication of forced labour.

Due to the nature of the international work, far from home with a costly journey that could not reasonably be covered by the seafarer, and the grave risks of abandonment, what could have been considered a commute has been legally incorporated as an integral element to the work and conditions considered as standard in this industry. Greater coverage has been won via collective bargaining at the ITF international and local affiliate union levels.

Many seafarers working on vessels flying their own national flag also have strong, longstanding CBAs which require the employer to arrange and pay for the entire journey to the vessel from door to door. As seafarers are often at sea for several months, a commute of many hours even for seafarers sailing in national waters is common.

[1] *Ferris v Delta airlines Inc.*, 277 F.3d 128, 135 (2nd Cir. 2001)

[2] Under Regulation 2.5.1.

Considering the above, when seafarers leave the ship while docked in port to exercise their right to shore leave, returning to their ship to continue their assignment cannot be said to be part of the commute.



It is common in the **European Road Transport** industry for truck drivers to cross national borders to deliver goods across the region. Road transport providers often rely on ‘posting’ workers from eastern EU countries, and are increasingly hiring workers from non-EU Eastern European and Central Asian countries who drive exclusively in Western Europe.

For these workers, their truck is their mobile workplace. Wherever their various assignments take them – in the several weeks or months that many drive before returning home – becomes their working environment. The ITF is fighting severe and exploitative conditions in European road transport. Drivers often spend months in the cabs of their trucks without access to adequate rest, cooking and sanitation facilities. Even in the cases where drivers are granted their legal daily rest and right to

nights spent outside of their trucks, drivers in these posted conditions remain on assignment, far from home, and therefore “at work”. Arguably, a truck driver’s commute begins and ends at the location where they pick up or return their trucks. For some, therefore, this would begin *after* a return drive in the truck to their base country.

In cases where truckers are driven to their assignment (and vehicle) in a minivan or similar by an agent of the employer, this may equate to a cross-border commute provided by the employer. This journey, under the direct or indirect control of the employer, should be considered as being already at work with the workers entitled to full pay and OSH protections. But in any case, the prevalence of modern slavery-like conditions in the industry calls for strong OSH protections to be upheld during these cross-border journeys. Deception in relation to travel and difficulty in organising travel are each ILO indicators of trafficking of adults for labour exploitation, relating to deception in recruitment and abuse of vulnerabilities. This journey is an integral part of the work experience which sets the tone of engagement between the employer and isolated worker throughout their assignment.



Train passenger, Berlin, Germany. Source: Unsplash, Bogdan Cadar

WHY COMMUTING IS AN OSH ISSUE

“Another problem that affects workers in an alarming manner is the frequent attacks on operators by users who try to evade paying fares. In fact, an attempt has been made by the managing entity Transmilenio and some of the concessionaires to transfer the responsibility for non-payment of the fare to the driver, which has resulted in serious injuries for them.”

**Sindicato Nacional de Trabajadores de Rama,
Servicios de la Industria del Transporte y Logística de Colombia (SNTT)⁸**

The ITF believes that when transport workers are commuting, they should always be treated as being “at work”. They should not have to rely only on voluntary agreements with employers but should be specifically protected by OSH law.

A key development is the ILO Violence and Harassment Convention (C190) which includes commuting in the definition of the “world of work” for the purposes of preventing violence and harassment.

At present, though, commuting is not widely or consistently recognised as being “at work” in national laws across the world.

As a result, workers when they are commuting may not be covered by occupational health and safety law.

This has grave consequences for workers, for example:

- Incidents and accidents to workers while they are commuting are not recorded and therefore are invisible to OSH regulators.⁹
- Travel to and from work is not generally treated as working time, which also impacts on workers’ pay and related benefits.
- This lack of recognition of the commute as a workplace issue also results in little or no access to workers’ compensation for injuries arising from the commute.
- Trade unions’ efforts to negotiate collective bargaining agreements to support workers having to travel a long distance to work have been met with public opposition, and the lack of parking facilities for workers who have to drive to work creates conflict in neighbourhoods.
- Public information explaining the difficulties faced by transport workers when travelling to and from work is not always available.



Waiting
Station

Passengers at bus stop, UK. Source: Unsplash, Kevin Grieve

WHY A GENDER-TRANSFORMATIVE APPROACH TO HEALTHY AND SAFE COMMUTING IS IMPORTANT

“I finished my shift at half-past midnight feeling happy and calm. I... never thought it would happen to me. Being followed by two men in the dark [when] walking to the car park. I thought I was walking in a safe place... my car seemed to be very far away. Thank goodness I reached it in time... I was afraid I had lost my freedom and autonomy.”

Woman ground staff worker in civil aviation, Italy¹⁰

Women are more at risk when commuting because of systemic challenges:

Many women, including women transport workers, do not have access to safe transportation to and from work. They frequently face violence and harassment on their commute, in addition to other hazards.

The [media release](#) for the World Bank report ‘Women, Business and the Law 2024’ notes: *“... though 151 economies have laws in place prohibiting sexual harassment in the workplace, just 39 have laws prohibiting it in public spaces. This often prevents women from using public transportation to get to work”.*

Women’s commuting can take longer as their journey may include undertaking a disproportionate burden of family responsibilities such as caring for relatives and delivering children to school, combining various journeys, sometimes called ‘trip chaining’.¹¹ The specific travel patterns of women as passengers are not taken into account as women are invariably

excluded from decision making about public transport provision.

Women transport workers are more at risk when commuting because of systemic challenges:

An [ITF survey](#) in 2022/2023 of 4,600 women railway workers from 56 countries found:

- **Only 50%** feel safe commuting
- **19%** feel very unsafe

Women railway workers also reported:

- Feeling vulnerable (17%)
- Experiencing verbal harassment (16%)
- Being followed or stalked (9%)
- Actual physical or sexual violence (3%)

Lack of access to convenient public transport was also an issue. Though 39% of respondents said public transport was their primary method of commuting, 32%

said public transport was unavailable due to late or early shift times, adding to the lack of commuting safety.

And, crucially, **32%** of respondents said that their employer does not see safety in the commute as a workplace issue.

According to a European Transport Workers' Federation (ETF) study, one in two women transport workers have experienced verbal or physical abuse.

A 2020 ETF study revealed that almost half think that their workplace does not prioritise a safe and adequate work environment for women.

A first Europe wide cross-sectoral survey of over 1,000 women transport workers conducted by the ETF in 2016 – 2017 revealed a worrying increase in physical, verbal and non-verbal sexual harassment, stalking, and abuse. 63% of women transport workers across Europe had experienced at least one recent act of violence, and 26% believed that harassment is part of the job and did not report the problem; this includes their commute to work.

The lack of safe commuting arrangements for women transport workers as passengers is yet another factor contributing to the systemic exclusion of women from decent jobs, education, access to public services, and economic independence – alongside inadequate or absent sanitation provision, poor pay and insecure work.

The situation is even more problematic for women workers in precarious, informal or non-standard forms of employment, such as platform workers or those working in informal public transport, for whom there is little or no protection. **The ITF has published an Informal Transport Workers' Charter which demands, among other things, the right to a safe and healthy working environment and an end to violence and sexual harassment against women.**

For many transport workers, multiple and intersecting forms of discrimination are an everyday lived reality, which is reflected in their lack of equal access to employment opportunities, and decent work and safe commuting. Discrimination based on factors such as gender, race or colour, age, sexual orientation or gender identity, disability, economic status, political opinion, religion or beliefs, migration status and national, ethnic, or social origin is often invisible in the face of privilege but very strongly persists in the world of work. Discrimination in any of these forms not only strips workers of dignity and respect, but also creates an environment that damages and corrodes the union movement.

Our work can only be truly inclusive and strengthened when it is informed by intersecting forms of discrimination and an intersectional approach is integrated into our work programme on the commute.

Slashing of employment standards across the transport industry impacts a safe and healthy commute. For example, in the civil aviation industry, privatisation, fragmentation of the service chain and increased competition often lead to commute-related commitments being excluded or withdrawn by employers, exposing workers to danger and further creating barriers to women's employment in the industry.

In addition, even when women workers predominate, women transport workers are frequently un- or under-represented when industrial issues are discussed, including occupational safety and health, and so their concerns (and ideas for solutions) go unheard, putting them at risk of further harm.

Because they are not represented, women transport workers' needs go unrecognised in public debates about safety. It can often be the case that if gender is included in the discussion about public transport safety, the focus is on the needs of passengers without recognising the needs of women transport workers as passengers.

This is why we need collective intervention to protect transport workers, particularly women, when they are travelling to and from work.

WHY COMMUTING MUST BE INCLUDED IN OSH MANAGEMENT

“The insecurity I experience related to my job when I sometimes finish very late and make my way to the parking garage. Sometimes it is dark and it can be quite scary. There should be parking closer to the airport when you don’t have to walk alone in the dark; proper lighting or security personnel present. It should be a given that your security is guaranteed.”

Woman cabin crew worker in civil aviation, Norway¹²

The design of workplaces and surrounding infrastructure is key to the safety and health of workers who have to commute. For example, car parks (which are not always safe in themselves) for airport and airline workers are often not located close enough to the airport terminal buildings for safe access, especially at night. If shuttle buses are not available or simply not affordable, workers often face a walk along busy airport access roads, putting them at risk of violence and road traffic accidents, as in the case of the tragic death of Unite member Cinzia Ceravolo which occurred at John Lennon Airport, Liverpool, UK.¹³

The gravity of the Covid-19 pandemic highlighted the importance of employer OSH measures where the workplace intersects with these public places. It was a significant factor

in re-framing employers’ obligations towards employees who may be exposed to infection during their commute.

Research¹⁴ into airborne transmission of disease on the London Underground revealed high infection transmission while travelling by public transport.

While governments prohibited or severely restricted movement during the pandemic, being required to break mandatory isolation, lockdown or curfew measures, workers performing essential work had the right to expect higher standards of OSH measures to protect them. In the context of such risk, it was clear that exposure ‘arose from work activities’ as the alternative was lockdown at home. Please refer to further discussion on this subject.¹⁵

RISK ASSESSMENT

In the Annex we have provided information about OSH commuting risk assessment which highlights many other risk factors which must be addressed by employers, and transport buyers, in consultation with workers and their representatives.

OSH AND EQUALITY AT WORK

Linking OSH with equality at work is crucial in the campaign for safe commuting for transport workers, because while violence, including gender-based violence, is a product of misogynistic culture it is *enabled* by particular workplace arrangements.¹⁶

Two recent developments are important campaigning tools for trade unions to improve the safety of the commute (and reinforce the need to link OSH with anti-discrimination action) for transport workers:

01. The ILO Violence and Harassment Convention No.190 (C190) adopted in 2019 together with Recommendation 206 (R206).
02. The designation in 2022 by the International Labour Conference (ILC) of a safe and healthy working environment as a fundamental right at work alongside, amongst other rights, the elimination of discrimination in respect of employment and occupation.

Developed and agreed at the ILO on a tripartite basis (representatives of governments, employers, workers), together, these are a firm base from which trade unions can campaign for occupational safety and health hazards associated with travel to and from work to be recognised, and for employers to be required to take action to prevent harm to workers while they are commuting.

ILO CONVENTION 190 (C190) AND ILO RECOMMENDATION 206 (R206)

C190 is the first international treaty to recognise the right of everyone to a world of work free from violence and harassment, including gender-based violence and harassment.

C190 is supported by ILO Recommendation 206 – which gives guidelines on its implementation.

Gender equality is at the heart of C190: Article 11 makes it clear that equality laws and OSH laws should work in unison by requiring member states to ensure that violence and harassment is addressed in national policies such as OSH, equality, and non-discrimination.

The ITF played a key part in ensuring that C190 includes commuting in the definition of the “world of work”.

C190 and R206: linking non-discrimination and occupational safety and health

C190 requires employers and governments to address work arrangements and risk factors that increase violence and harassment, and governments to adopt laws which define and prohibit violence and harassment in the world of work, including gender-based violence and harassment. It may also require the extension or adaptation of existing OSH laws and measures.

C190 also requires governments to take third party violence into account as part of an integrated approach to laws, policies and measures to address violence and harassment. An example would be to require employers to protect workers from third party violence including when they are commuting.

Key provisions of C190

As mentioned in Briefing 4 (The Commute) of the ITF’s ILO C190: A transport workers’ toolkit, the text of C190 and R206 is a useful starting point when negotiating collective bargaining agreements as it is already jointly agreed at international level through the tripartite system at the ILO.

The key articles which link to the commute are:

Article 2 – which confirms the **right of everyone irrespective of their contractual status to a world of work free from violence and harassment**, including gender-based violence and harassment and the extensive application of C190.

Article 3 – which sets out the **wide-ranging definition of the world of work** that goes beyond the physical “workplace” and includes working in public places and when commuting, thus placing obligations on various actors, including governments and employers to protect workers from violence and harassment in these spaces.

Article 4 – which requires Members to **adopt in consultation with representative employers’ and workers’ organisations, an inclusive, integrated and gender-responsive approach** for the prevention and elimination of violence and harassment in the world of work.

Article 5 – which requires ratifying countries to **give effect to the fundamental principles and rights at work**.

Article 6 – which seeks to protect groups which are more likely to experience discrimination by requiring ratifying countries to **adopt laws ensuring the right to equality and non-discrimination in employment**.

Ratifying countries must **ensure protection from and prevention of violence and harassment** in the world of work (**Arts 7–9**). This encompasses a range of different obligations, such as defining and prohibiting violence and harassment in the world of work in laws and regulations (**Arts 4[2][a] and 7**) and adopting appropriate measures to prevent it (**Art. 8**), including by requiring employers to take specific measures (**Art. 9**).

Article 10 – which requires ratifying countries to **monitor and enforce laws and regulations on violence and harassment** and ensure **access to effective remedies**, including gender-responsive dispute resolution and **embedding the right of workers to remove themselves from situations of imminent danger** due to violence and harassment.

Article 11 – which specifically links OSH and non-discrimination by requiring ratifying countries to ensure that harassment in the world of work is **addressed in relevant national policies, such as those concerning occupational health and safety, equality and non-discrimination, and migration**.

For more information, please refer to the ILO’s [C190 Guide](#) and the ITF’s [ILO C190: A Transport Workers’ Toolkit](#).

R206 provides guidance on the implementation of C190. Paragraphs that are relevant to the commute include, for example:

Paragraph 8 discusses the workplace risk assessment – see Annex 1.

Paragraph 9 states that ratifying countries should adopt appropriate measures for sectors and work arrangements in which exposure to violence and harassment may be more likely, such as night work, work in isolation and the transport sector.

A SAFE AND HEALTHY WORKING ENVIRONMENT IS A FUNDAMENTAL RIGHT AT WORK

Protection of workers from sickness, disease and injury were the original foundations of the ILO, but in the wake of the Covid-19 pandemic the decision was taken by the ILO in 2022 to include the right to a safe and healthy working environment as a fundamental principle and right at work – alongside other rights such as the elimination of discrimination in employment and occupation. This is a key factor underpinning this campaign.

As a result, the core health and safety conventions C155 and C187 are now fundamental ILO conventions. As a result, all ILO member states must act to give effect to the fundamental principles and rights therein, even if they have not ratified them.

C155 is the **Occupational Safety and Health Convention** which sets out what must be done by governments and employers to provide a safe and healthy environment for workers.

C187 is the **Promotional Framework for Occupational Safety and Health Convention** which describes a national preventative health and safety culture as a culture in which the right to a safe and healthy working environment is respected at all levels, where government, employers and workers actively participate through a system of defined rights, responsibilities and duties and where the principle of prevention is given the highest priority.

C190 seeks to achieve one essential element of occupational health and safety – to keep workers safe from violence and harassment at work. Many elements are needed for a safe and healthy work environment, but there can be no OSH without ensuring that the world of work is free from violence and harassment. Because of this very particular relationship between OSH and C190, we assert that the nature of OSH as a fundamental principle further elevates

the importance of ratifying and effectively implementing C190.

At least in respect of violence and harassment, governments and employers must consider the commute. If the commute has been identified as such a high risk for violence and harassment, it is difficult to see how this space would not be relevant for other OSH concerns.

REACHING BEYOND THE ILO TO BUSINESS AND HUMAN RIGHTS

Making OSH a fundamental right has impacts beyond the ILO – for example in relation to the UN Guiding Principles on Business and Human Rights (UNGPs). The UNGP framework of company human rights due diligence is important because it takes human rights (including worker and labour rights) and makes them of direct and immediate concern to companies – **both directly employed workers and those in their supply chains**. The UNGPs expressly refer to the ILO fundamental principles – which now includes OSH – as the basic human rights that companies should respect, **at a minimum**.¹⁷

Without having to rely on the state to translate these into national laws, it is therefore widely accepted that companies have a direct responsibility to consider the impact of their activities, including what they have failed to do, on the occupational health and safety of workers.

They must avoid causing or contributing to an unhealthy or unsafe work environment, and actively engage with stakeholders to identify the pertinent OSH risks so they can be prevented or offset.¹⁸ Workers and their unions are the clear relevant stakeholders uniquely placed to identify OSH risks.

Not only direct employers, but also other companies along the supply chain should do this, because their responsibilities can arise through their direct involvement or contribution, but also through business relationships.

Employers have a responsibility to comply with all human rights and international

labour standards wherever they operate internationally. Where transport workers work cross borders and are subject to different legal regimes, employers must respect international standards over and above compliance with national legislation. It is relevant only where national law or context prohibits or makes it impossible to meet its responsibilities fully; and companies should still make every effort to respect rights to the greatest extent possible and be able to demonstrate this.

New national mandatory human rights due diligence laws are following this UNGP framework, referencing fundamental human rights, which now indisputably include OSH. OSH concerns of workers worldwide have been elevated in international and national laws that hold companies to account. This gives workers more power at the bargaining table, different points of leverage along the supply chain, such as investors and clients (which also have HRDD obligations as business partners), as well as accessible mechanisms launched to implement these laws.

“I sometimes think that it can be dangerous for a woman to walk alone at 5 in the morning... As you can see, there is no-one here. The parking spaces in front of Amazon are reserved for Amazon employees and surrounding companies. So those of us who come to provide the driver service have to find parking spaces that are... sometimes dilapidated and we have to walk 500 metres on foot to get to the van. ...it would be helpful to have a transportation system, both urban and suburban, that serves all areas, including isolated ones.”

Woman supply chain courier for Amazon working out of an isolated site with no access to public transport, Italy¹⁹

The [ITF's Supply Chain Human Rights Principles](#) require supply chain actors to:

01. Engage in collective bargaining and support freedom of association.
02. Establish and/or participate in national, international, regulatory, sectoral, bipartite, and multipartite bodies to jointly advocate for, and agree standards for the safety,

fairness, and sustainability of transport in supply chains, involving trade unions as equal parties.

03. Recognise the ITF and its affiliates as representatives of transport workers and cooperate to address actual and potential impacts on transport workers' human rights, including labour rights, in their operations and third-party relationships.
04. Recognise and exercise their duty and/or responsibility to fulfil and/or respect human rights, regardless of the ability and/or willingness of other actors to fulfil their obligations.
05. Implement internationally recognised human rights, other relevant ILO instruments and codes of practice, including those concerning OSH.
06. Guarantee sanitation rights by cooperating with the ITF to implement the ITF Sanitation Charter in their operations and third-party relationships.
07. Promote and pursue decent work in their operations and third-party relationships, including by facilitating the transition from non-standard forms of employment (NSFE) to formal work.
08. Guarantee that subcontracted workers have access to the equivalent standards of directly employed staff.
09. Recognise and cooperate with global union federations and their affiliates to ensure adequate operational-level grievance mechanisms are in place for all workers.
10. Ensure, provide for, and/or adequately resource, the information, training, and support concerning OSH rights and protections for all workers and third parties in their supply chain including safe and healthy commuting.

For more information see [ITF Supply Chain Principles](#); [ITF Human Rights Due Diligence: Respecting the Human Rights of Seafarers in Global Supply Chains](#).

CALL TO ACTION: NATIONAL GOVERNMENTS

The ITF demands that national governments take immediate action to:

01. Protect the health and safety of all transport workers, whatever their employment status, while they are travelling to and from work.
02. Uphold the fundamental right to a safe and healthy working environment.
03. Adopt the principles of the [ITF's Manifesto on Sustainable Public Transport investment, funding and fares](#). This includes:
 - Investing at national level in public transport expansion and improvement.
 - Co-operating with regional and local governments to develop sustainable funding models fitting to the specific circumstances of different public transport systems.
 - Prioritising the improvement of the conditions of the most vulnerable workers including women.
 - Setting fare levels and structures to address inequality and encourage public transport use.
 - Supporting publicly owned and democratically controlled integrated systems that meet universal goals.

This means that governments must:

Encourage, support, and engage in social dialogue and stakeholder engagement

- Recognise the central role that trade unions play in influencing the development of OSH protection and influencing compliance with health and safety legislation in the workplace, particularly in transport supply chains where there is fragmentation and prevalence of non-standard forms of employment.
- Promote collaboration between workers and employers through social dialogue and encourage collective bargaining when taking steps to protect all transport workers when they are travelling to and from work.
- Engage with social partners, including national, regional and global trade unions, regional and global employer associations, international financial institutions, municipalities, national and regional transportation authorities, community groups, passenger organisations and workers associations to provide safe, healthy, and affordable public transport systems which take account of the needs of transport workers as commuters.

- Embed equality practice into all their activities to eliminate all forms of discrimination, including those based on gender, race or colour, age, sexual orientation or gender identity, disability, economic status, political opinion, religion or beliefs, migration status and national, ethnic or social origin, and ensure that the specific vulnerabilities of marginalised groups of transport workers are heard and addressed by involving transport workers at all stages.

Legislate

- Enact mandatory supply chain human rights due diligence (HRDD) legislation, recognising trade unions as critical stakeholders in the design, implementation, and evaluation of HRDD. This includes enacting the demands of the ITF's Supply Chain Human Rights Principles, including safe and healthy commuting.
- Ratify ILO Violence and Harassment Convention 190. Ratification is not simply a paper exercise and must include effective and meaningful implementation in consultation with trade unions.
- Make it a specific criminal offence to attack transport workers.
- Ratify and effectively implement all other relevant ILO Conventions including Convention 155 (Occupational Health and Safety) and Convention 187 (Promotional Framework for Occupational Safety and Health), 2006 and ILO non-discrimination Conventions such as:
 - C111 Discrimination (employment and occupation), 1958
 - C183 Maternity protection, 2000
 - C156 Workers with family responsibilities, 1981
- Adopt and effectively implement the Montreal Protocol 2014 covering civil aviation, which provides deterrents to unruly and disruptive passenger incidents on board flights, into national law.

Extend and embed workers' rights when commuting

- This includes legislating for the right of a worker to refuse to commute without detriment where the commute poses an immediate threat to their health and safety.

Extend employers' health and safety duties

- Introduce or amend legislation to include an employer's duty to protect workers while they are commuting to and from work, including under occupational health and safety law.
- Require all employers to include commuting risks in their health and safety policies, risk assessments and all other relevant procedures and policies, in consultation with trade unions.
- Require all employers to carry out joint labour and gender impact assessments on all their health and safety policies and procedures including travelling to and from work.
- Endorse and implement the demands of the ITF's Transport Workers' Sanitation Charter, for example legislating for decent work in supply chains to ensure that toilet provision, safe parking and rest areas for mobile workers, regardless of their gender, is actively considered and included (in consultation with transport employers and transport trade unions) when developing and updating road, rail, maritime and aviation infrastructures and networks.

Workers' compensation for injuries and ill-health arising from commuting

- Introduce or amend legislation to extend the definition of an occupational accident or disease to include physical and psychological injuries to both formal and informal workers which occur while they are commuting.
- Include commuting accidents and ill-health occurring while commuting in workers' compensation and criminal injuries compensation schemes, particularly those arising from violence and harassment and infections such as Covid-19.

Enforce legislation

- Fund and implement proactive enforcement programmes by labour inspectorates and law enforcement agencies to eradicate violence, including gender-based violence, in the world of work and in the wider community.

Conduct gender-responsive OSH research into commuting and violence

- Conduct and act upon research into the occupational health and safety consequences of commuting for women and men transport workers.

Recording and notification of occupational accidents and diseases arising from commuting

- Ratify P155 – Protocol of 2002 to the Occupational Safety and Health Convention, 1981, and comply with and promote the use of the ILO Code of Practice (1996 Recording and Notification of Occupational Accidents and Diseases in particular the inclusion of commuting accidents.
- Introduce or amend legislation to require employers to report commuting accidents to workers as a separate category under

national OSH reporting requirements. Such data should be sex/gender-disaggregated to identify gender-specific health and safety concerns arising from commuting and action to be taken.

- Collect and act upon data, which should be sex/gender-disaggregated, on commuting accidents and injuries to transport workers (including data collected by employers) in consultation with trade unions and employers' organisations.

Invest in sustainable and decent public transport for the long term to help ensure safe commuting for all

To this end, the ITF demands that:

- All public transport services must be publicly owned and operated.
- Democratic accountability in the planning, development and future of public transport must be guaranteed. Investment in public transport is prioritised over investment that fosters private vehicle use.
- Significant investment and funding are targeted towards sustaining, formalising, and integrating informal services.
- Public finance supports public ownership and operation.

CALL TO ACTION: INTERNATIONAL FINANCIAL INSTITUTIONS (IFIS)

International financial institutions (IFIs) such as the World Bank often provide loans to governments, for example, to develop or improve transport infrastructure and influence national transport policy. They adopt labour safeguard frameworks as part of the lending process, but women's rights and gender equality are currently poorly protected by most IFI safeguard frameworks²⁰. For example, most international financial institutions do not have a standalone gender safeguard dedicated to assessing and preventing gender-related harm and to protecting gender equality as part of their lending processes for transport related projects. This must change.

Similarly, IFIs' safeguard frameworks do not routinely require borrowers to address gender-specific risks in the design of occupational safety and health measures including preventing violence and harassment during travel to and from work.

IFIs, and states making decisions as IFI members, have duties under international human rights law. All states have duties under international law to respect, protect

and fulfil human rights. The UN Committee on Economic, Social and Cultural Rights has confirmed that:

States parties making decisions in their capacity as members of international financial institutions or other international organisations cannot ignore their human rights obligations when acting in their capacity as members of these organisations.

The ITF's priorities for engaging with IFIs are:

- IFI-financed companies and projects should strengthen women's employment and end occupational gender segregation in the transport industry.
- IFI-financed companies and projects should promote decent work, including terms and conditions that address decent work and labour rights in contracts with employers, including contracted operating companies and sub-contractors.
- All IFI projects should incorporate measures to end violence against women transport workers.



Informal transport worker, Uganda. Source: ITF

- Women in decision-making teams: women workers and their representative organisations must be consulted as stakeholders and their views taken into account in project design and labour and gender impact assessments.
- Trade unions must be recognised as stakeholders in all IFI-financed projects.
- Worker-led formalisation: a just and worker-led transition from informal to decent formal work for women and men workers.
- Stronger IFI safeguards including gender safeguards.

IFIs must embed equality practice into all their activities to eliminate all forms of discrimination, including those based on gender, race or colour, age, sexual orientation

or gender identity, disability, economic status, political opinion, religion or beliefs, migration status and national, ethnic or social origin and ensure that the specific vulnerabilities of marginalised groups of transport workers are heard and addressed by involving transport workers at all stages.

In particular, labour safeguards must include the requirement to address gender-specific risks in the design of OSH measures. Gender-specific provisions can be utilised by unions to demand that employers undertake gender-responsive risk assessments and put in place measures to protect women transport workers.²¹ For further detail and advice, please see the ITF's trade union guide: [Labour and gender related safeguard frameworks of international financial institutions \(2022\)](#).

CALL TO ACTION: MUNICIPALITIES AND TRANSPORTATION AUTHORITIES

“While public transportation may be available, safety and reliability often fall short. Women often endure overcrowded buses, trains or metros, where they may encounter problems. This is particularly true during late hours or in remote areas, which leaves women vulnerable to potential dangers.

“Inadequate lighting, poorly maintained vehicles and the absence of security measures further aggravates their safety concerns. Other challenges, including poorly maintained roads, lack of pedestrian-friendly infrastructure, and insufficient lighting at bus stops or train stations, make safety during daily employee commute a hurdle for most women.”

National Union of Seafarers of India (NUSI)²²

The ITF demands that municipalities and transport authorities take the following actions:

WORKER PARTICIPATION

- Fully respect and promote the principles of freedom of association and the right to organise, including the right of workers to establish and join trade unions of their choice; and the independence of trade unions themselves.
- Involve trade unions, both women and men workers, and their representatives, at all stages when planning and implementing safe commuting.

JUST AND FEMINIST CITIES – THE ROLE OF TRANSPORT WORKERS

Public transport and gender equality are essential components of a 'just city'. Passengers feel safer if public transport systems are fully staffed and staff are visible, and women feel safer if there are women transport workers present.²³

Women must be hired into decision-making roles in companies providing public transport, so that management reflects the needs and trip patterns of women, who often represent around two-thirds of public transport passengers.²⁴

Public transport workers help ensure the fundamental and universal right²⁵ to freedom of movement, and passengers' access to their rights to work, to education, healthcare and so on. Public transport is their workplace as well as often their mode of travel to and from work, and this must be a safe space in which to both work and commute.

More women workers and decision makers are equally required in city planning, local authorities and government transport ministries.

There must be universal publicly owned transport in order to lower prices and improve service provision, especially for night-time and off-peak services, and the services must reflect the needs of all women passengers, including women transport workers.

The ITF report Just Cities, based on the vision of women transport workers and women transport union leaders and activists in Latin America, describes a 10-point list of points to define a just city, including:

Be safe. *All citizens can live and work in the city, and public transport is a space free of violence, harassment, or abuse.*

CLIMATE CHANGE

- Women are more likely to be adversely affected by climate change.²⁶ Municipalities and transit authorities must work towards reversing the effects of climate change and ensuring just and equitable urban environments, including safe commuting via sustainable public transport.
- Ensure resilience to extreme weather conditions and disasters: adopt and implement urban disaster risk reduction and management and emergency response systems; integrating safety and health measures and protection protocols for urban workers most exposed to extreme weather events and climate-related health and safety concerns, including transport workers.
- Municipalities should adopt the C40's Mayoral Principles for a green and just recovery in public transport which are set out on page eight of C40's report The Future of Public Transport. Investing in a frontline service for frontline workers and the ITF/C40 Cities statements in their 2021 report Making COP26 Count.
- Integrate Just Transition principles to ensure that jobs in transport most often done by women are not unfairly and disproportionately lost to green technologies or automation without the opportunity for re- and upskilling and retention within the transport industry.
- Embed equality practice into all their activities to eliminate all forms of discrimination, including those based on gender, race or colour, age, sexual orientation or gender identity, disability, economic status, political opinion, religion or beliefs, migration status and national, ethnic or social origin, and ensure that the specific vulnerabilities of marginalised groups of transport workers are heard and addressed by involving transport workers at all stages.

ASSESS GENDER IMPACTS AND INVOLVE WOMEN

- Gender impact assessments and gender-responsive assessment criteria, designed through dialogue and engagement with trade unions and other interested parties such as passenger groups, must be carried out and their findings implemented to support better outcomes.²⁷ Such assessments and criteria should specifically address safe and healthy commuting.
- Adopt a gender perspective in the planning and design of the city (e.g., business, housing, public transport and infrastructure, childcare, open spaces, safe parking, lighting, and technical support) and ensure women's participation. As mentioned above, the ITF research report 'Just Cities' sets out 10 key demands for the creation of just cities.

PROVIDE PUBLIC TRANSPORT SERVICES AND DECENT WORK

- Public transport services²⁸ must be: publicly owned and operated; have democratic accountability in the planning, development and future of public transport guaranteed; be fully staffed; and public finance must support public ownership and operation.
- Maintain fares policies which support publicly owned and democratically controlled integrated transport systems that meet universal goals as set out in the ITF's Manifesto on sustainable public transport investment, funding and fares.
- Consider innovative ways of funding and encouraging the use of public transport by workers, for example, employers in the Île-de-France region must contribute at least 50% of their employees' transport costs based on current fares.

- Provide decent work which must enable the worker-led transition from informal to formal work, support the direct employment of women transport workers and establish fully staffed public transport systems to ensure that workers are not fatigued or overworked, and are always present and visible when the transport is running, day and night.
- Prioritise safety and security on public transport, for example installing CCTV if this effectively assists security and is not used as a tool to monitor workers; directly employ security guards and provide effective lighting in the streets, on rolling stock, in sanitary facilities, and at railway stations, bus stations and bus stops; and ensure that public transport is fully staffed at all times with non-driving staff (such as conductors) always present on platforms and on public transport.
- Implement robust and effective rolling stock and infrastructure maintenance programmes.
- Prioritise affordable housing initiatives to address the challenges of gentrification and ensure that workers live in the communities they serve.
- Consider housing as a key component of the development of transport infrastructure with housing for public transport workers and their families as a priority.
- Collaborate with affected communities to mitigate the displacement of residents due to public transport-related development projects²⁹.

CALL TO ACTION: EMPLOYERS

A UK railway worker who finished her shift after midnight was verbally attacked by a customer who had waited for her shift to end. Even though there was CCTV footage of the incident, she was not shown the footage. It was a stressful experience, exacerbated by a lack of concern by the company: *"I was shaken. The most upsetting thing is that the company did not show any concern... personally, I felt alone at my workplace."*

An unsafe, violent or stressful commute will not only expose a worker to harm but may also render them less safe, happy, effective and productive whilst they are at work.

The ITF demands that employers:

01. Respect the fundamental rights of workers³⁰ including freedom of association, collective bargaining, the elimination of discrimination in respect of employment and occupation and a safe and healthy working environment.
02. Recognise and act upon their moral and legal responsibilities to keep workers safe and healthy while travelling to and from work, including those who are required to travel from the home country to work in another country.
03. Recognise the commute as a workplace issue under C190 and extend their duty of care to embed safe commuting practices for all workers (both their own workers and workers in their supply chain).
04. Acknowledge their responsibility to their own workers and those in the supply chain to provide a safe and healthy working environment that extends throughout its global operations, divisions/business units and transport and logistics supply chains.

05. Recognise that the responsibility for the occupational safety and health of workers is not the personal responsibility of individual workers and their colleagues, but it is a collective issue and falls within the employer's responsibilities, in line with a safe and healthy working environment being an ILO fundamental principle and right at work.
06. Embed the right of workers to remove themselves from serious or imminent danger whether at the workplace or because commuting poses risks to their health and safety (for example exposure to infection or violence) without detriment and have appropriate arrangements in place for reporting and actioning concerns.
07. Embed equality practice into all their activities to eliminate all forms of discrimination, including those based on gender, race or colour, age, sexual orientation or gender identity, disability, economic status, political opinion, religion or beliefs, migration status and national, ethnic or social origin, and ensure that the specific vulnerabilities of marginalised groups of transport workers are heard and addressed by involving transport workers at all stages.

Take practical action with the full participation of trade unions – workers and their representatives – including through the joint OSH committee:

08. Appoint a competent person to advise on commuting and OSH, including associated equality action.
09. Identify hazards and assess the risks of violence and harassment and other

hazards which may arise during the commute (whether workers travel by foot, their own vehicle such as car, bicycle, motor cycle, public transport, employer-provided transport, walking to a pick-up point etc.), including third party violence and associated psychosocial risks with the participation of workers and their representatives, and take measures to prevent and control them.

10. Establish a commuting safety working group within the joint OSH committee.
11. Introduce pro-active and practical OSH measures to protect workers' health and safety not only in their workplace (whether it is a fixed workplace or a vehicle) but also when they are travelling to and from work, and develop, implement and monitor OSH risk assessments and other OSH measures to prevent violence and harassment including a workplace policy on violence and harassment that covers commuting.
12. Enforce within their operation the measures set out in the ILO Convention on Violence and Harassment (No. 190) to protect their workers from violence and harassment at work beyond only those countries that have ratified C190, and to meet their fundamental OSH responsibilities, as set out in C190.
13. Tailor all OSH policies, risk assessments and other procedures and information and training as necessary to individual workers, and address the specific concerns of women transport workers.
14. Adopt an inclusive, integrated and gender-transformative approach to OSH which involves women transport workers and tackles underlying causes and risk factors, including gender stereotyping, multiple and intersecting forms of discrimination and unequal gender-based power relations.



A subway worker cleans a carriage, USA. Source: Unsplash, Robinson Greig

15. Keep all OSH policies and procedures under regular review through consultative mechanisms such as the joint health and safety committee.
16. Recognise that fear of infection during the Covid-19 pandemic has added to the anxiety of transport workers who commute and work on public transport, and provide advice on avoiding infection, and mental health support.
17. 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 the rights and responsibilities of workers and other persons concerned, in relation to the workplace policy on violence and harassment, including when commuting.
18. Support women transport workers in taking up worker representative roles and involve women workers and transport users at all stages.
19. As shift workers may often work alone at night, develop and implement effective lone working policies alongside safe commuting policies and procedures, fatigue management and risk assessments for shift work.
20. Ensure that all policies and procedures including lone working, commuting, stress and fatigue management and prevention are subject to independent labour and gender impact assessments, the results of which are actioned.
21. Work as necessary with other actors, for example the public authorities responsible for road infrastructure to provide safe access to logistics and industrial parks and ports.
22. Act on and cooperate with the [ITF's Supply Chain Human Rights Principles](#) including ensuring, providing for and/or adequately resourcing the information, training and support concerning OSH rights and protections for all workers and third-parties in transport supply chains; and guarantee that subcontracted workers have access to the equivalent standards of directly employed staff.
23. Establish clear systems, procedures and confidential, non-punitive, arrangements for the recording and notification of occupational accidents and diseases and near misses arising while commuting including collecting sex/gender-disaggregated data. Give information to workers about when and how to report and encourage them to report concerns.
24. Train and inform all employees about all OSH policies and procedures.
25. Cooperate with national governments and government regulators and comply with legislation which requires the sharing of data about injuries and ill health arising from employees' travel to and from work.
26. Implement practical steps to protect and support workers during their commute – please see the Annex for examples.

MULTINATIONAL EMPLOYERS AND TRANSPORT SUPPLY CHAINS

The ITF demands that multinational employers act in accordance with the [ITF's Supply Chain Human Rights Principles](#) including taking responsibility for workers' health and safety when they are commuting; and guarantee that subcontracted workers have access to the equivalent standards of directly employed staff. These principles are set out on pages 20–21.

This must include requiring, developing and implementing safe travel to and from work policies as part of their procurement practice and their environmental, social, and governance (ESG) and corporate social responsibility (CSR) initiatives and ensuring those requirements are met throughout the supply chain.



Train Workers, Morocco. Source: ITF

BARGAINING CHECKLIST

THIS IS NOT EXHAUSTIVE

COLLECTIVE BARGAINING

Are women members included in negotiating and bargaining teams such as the health and safety committee, violence prevention and commuting policy development?

Are women's commuting issues identified prior to bargaining and included in the bargaining agenda?

Is there a workplace OSH policy on commuting?

Are appropriate, accessible, conveniently located and private changing facilities and sanitation and hygiene facilities provided for women and men who commute to and from work?

Where public transport is not available does the employer provide transport (for example a bus service) to and from work, particularly:

- For workers whose work starts or finishes at unsocial hours?
- To accommodate workers' childcare needs?

Is this transport provided for all workers, not just employees?

Are health and safety policies and procedures, including risk assessments, gender-responsive, including on the issue of commuting, and are women transport workers involved at all stages?

Is there a workplace policy covering violence and harassment including sexual harassment, and does it cover commuting? Are women transport workers involved in policy development?

Is there a workplace stress policy? Does it include commuting? Are women transport workers involved in policy development?

Does the union appoint Women's Advocates who are specially trained to support members who are survivors of violence and/or specific equality representatives?

Does the union support complaints about discriminatory commuting policies?

Are union members trained in tackling discrimination at work and on conducting equality/gender impact assessments including in relation to commuting hazards?

Are equality/gender impact assessments carried out on all OSH policies including commuting policies?

Is there a comprehensive policy on preventing infection (such as Covid-19) at work including commuting?

Has it been developed through joint discussions between the employer and the trade union?

INTERNATIONAL FINANCIAL INSTITUTIONS

Do IFIs consult and engage with trade unions throughout the lending process for transport projects – from the initial Environmental and Social Impact Assessment (ESIA) to project implementation?

Is commuting covered in the ESIA?

Please refer to the ITF's priorities for engaging with IFIs set out in the ITF's toolkit The Labour and gender-related safeguard frameworks of international financial institutions:

01. Strengthen women's employment and end the systemic exclusion of women from the transport and logistics industry.
02. Promote decent work, including terms and conditions that address decent work and labour rights in contracts with employers, including contracted operating companies and sub-contractors.
03. Incorporate measures in projects to end violence against women transport workers.
04. Include women in decision-making/ negotiating teams: women workers and their representative organisations must be consulted as stakeholders and their views taken into account in project design and labour and gender impact assessments.
05. Recognise trade unions as stakeholders.
06. Facilitate a just and worker-led formalisation from informal to decent formal work for women and men workers.
07. Strengthen IFI safeguards, especially in the area of labour and gender.

NATIONAL LAW

ILO conventions

Has your government ratified and implemented Convention 190 with the involvement of your trade union?

Has your government ratified relevant ILO health and safety and non-discrimination conventions? (See the section on 'Campaigning' below for examples).

Have these been effectively implemented into national law and policies?

OSH Laws

Are there national occupational health and safety laws?

Does your OSH law have a definition of a commuting accident or incident?

Are employers required to report commuting accidents/ill health/injuries to a national reporting system?

If so, is the reporting requirement enforced by government agencies, for example the labour inspectorate?

Does your government take a gender-responsive approach to enforcement of health and safety laws including commuting?

Anti-discrimination laws

Are there national anti-discrimination/equality laws?

Do you have national law against violence including gender-based violence such as sexual harassment?

Does it require employers to protect workers during the commute and generally from third party violence?

OSH research

Is research on women's occupational health and safety a priority for the government?

Does occupational health and safety research include injuries and ill health arising from commuting?

Are there opportunities to raise women's issues and include women worker representatives as part of dialogue with municipal, local, national and international government representatives, and as part of tripartite discussions relating to OSH and the commute?

CAMPAIGNING

Do you have a union campaign on workplace OSH issues, including preventing violence in the world of work including when workers are commuting?

Does your union campaign on disability rights, including ensuring access to public transport for all?

Are women members aware of union campaigns and fully involved in their preparation and implementation?

Does your union provide training and awareness raising for representatives and members on violence and harassment at work and on OSH and commuting?

Does your union organise activities to support international action day campaigns? For example:

- International Women's Day (8 March)
- International Workers' Memorial Day (28 April)
- World Day for Decent Work (7 October)
- World Toilet Day (19 November)
- UN Day for the Elimination of Violence against Women (25 November)

ILO Conventions

Are there opportunities to campaign for your government to ratify and effectively implement key ILO conventions? In particular:

- C087 Freedom of association and protection of the right to organise, 1948
- C098 Right to organise and collective bargaining, 1949

- C111 Discrimination (employment and occupation), 1958
- C183 Maternity protection, 2000
- C156 Workers with family responsibilities, 1981
- C155 Occupational safety and health, 1981
- C187 Promotional Framework for Occupational Safety and Health Convention, 2006
- C190 Violence and harassment, 2019

Campaign for your government to adopt the recommendations of R206 on Violence and Harassment as a route towards effective implementation of C190; and R204 Transition from the Informal to the Formal Economy Recommendation, 2015.

Your community and safe commuting

Can your union establish and build links with NGOs, community groups, disability groups and passenger user groups and other interested parties to campaign for safe and healthy commuting and decent, accessible, safe, and affordable public transport? Please refer to the ITF's Future is Public Transport campaign.

ITF AFFILIATES TAKE ACTION

ITF affiliates are campaigning successfully for safer commuting for workers.

UNITE THE UNION, GREAT BRITAIN

Unite's ongoing campaign for safe commuting, [Get ME home safely](#), includes an online resource pack. Information includes a draft motion to raise with local authorities, a members' survey form and much more.

The **Get Me Home Safely campaign** has been taken to the European stage by the **European Transport Workers' Federation (ETF)** which launched its campaign on 8 March 2023. The demands of the campaign are [here](#).

There are linked ETF campaign materials including a general campaign video and sector-specific videos focusing on logistics, railway workers and civil aviation. The ETF campaign aim was awareness raising and to provide material for implementation at national and local level through its affiliates.

The **ITF's Inland Transport Sections – Road and Rail and Urban Transport** – has also adopted resolutions supporting the Get ME Home Safely Campaign which are being implemented.

The **ITF Congress** held in October 2024 also adopted a resolution on the Get ME Home Safely Campaign.

The **Belgian trade union federation ACV-CSC** launched the 'get me home safety' campaign at its congress in October 2023. The main concern is that few companies in Belgium do a risk assessment of the route that workers have to take to travel to and from work. The law needs to be changed to make this obligatory.

Campaign activities include an article in the federation's national newspaper and in its own [magazine](#). The campaign has already had successes. For example, airline staff (most of whom are women) employed by a major travel and tourism company who were on standby – so they had to get to the airport at short notice – were having to spend standby time in their car in car parks close to the airport. Workers felt very unsafe. ACV-CSC negotiated a collective agreement with the company which allows these workers to spend standby time in a hotel at the airport in safe conditions.

The agreement includes employee entitlement to take a taxi or hire car or a payment in lieu when they start at 0500 or earlier and finish at midnight and other forms of assistance for employees travelling to and from work between midnight and 0500 hours. Travel assistance is also provided to return an employee to their normal start location.

The **Korean Public Service and Transport Workers' Union (KPTU)** reports: On most of the private metro lines, which are owned by the central or local government and contracted out to the private sector, on-call rooms have disappeared to save costs. Although a small section of only one private metro line has an on-call room, it is poorly equipped compared to that of the public metro lines.

Some unions with members working for the private metro lines, which are owned by the central or local government and contracted out to the private sector, have negotiated provisions such as a fixed fare travel subsidy which is automatically increased in line with increases in taxi fares, or employee parking for private vehicles.

The **International Longshore and Warehouse Union (ILWU)** in Canada is alert to safety concerns around commuting and has negotiated the following provisions:

- When a worker goes to work outside their regular port there is a set pay schedule based on distance and travel time.
- Employers are required to provide transportation for workers to some locations.
- This is done via taxis to certain terminals, which are always available. The workers are picked up at their dispatch hall and driven to work. They can also get a taxi back at the end of the day.
- If a worker is on the overnight – graveyard – shift the taxi pick up and drop off takes place at a mutually-agreed upon location as their dispatch hall is in an isolated area.
- Sharing of taxis is permitted (not during the Covid pandemic) though the union discourages workers from sharing rides with other workers unless they know them well.

The **Transport and General Workers' Union of Zimbabwe (TGWU)** has provision in its collective bargaining agreement with the Transport Operating Industry for employers either to provide transport to work for employees or pay a transport allowance based on prevailing public transport.

The **Canadian trade union UNIFOR** has a *National Transit Policy* which outlines six key areas for action. One of these is about worker and passenger safety and calls for “mechanisms to eliminate all incidences of violence and harassment on transit systems” and within the Covid-19 context the implementation, maintenance and enforcement of resources and measures to keep both workers and riders safe. UNIFOR is also calling for the development of a set of national transit safety standards which would encompass areas such as worker and rider injuries, access to workers’ compensation, verbal, physical and sexual harassment, and reporting of incidents.

The 2019 joint agreement signed by the ITF and the **International Association of Public Transport (UITP)** on women’s employment in public transport includes a number of practical recommendations for policies to strengthen women’s employment and equal opportunities and promote decent work. One of the examples of initiatives referenced in the recommendation on health and safety at work is “consideration of safety when travelling to/from work and appropriate measures in place”.

ANNEX

COMMUTING AND OSH RISK ASSESSMENT

“Workers spend more time travelling than working, and obviously [have] little spare time for leisure, for relaxation or even for healthcare, as you are completely stressed out on arrival because you had to deal with so much traffic.”

Union representative, Mexico City, quoted in ITF's Research Report 'Just Cities' and women public transport workers in Latin America



WHAT IS A RISK ASSESSMENT?

A careful examination of what, in the world of work, could cause harm to people. It enables a weighing up of whether enough precautions are in place or whether more should be done to prevent harm to those at risk, including workers and members of the public.³¹

It is the employer's duty to carry out the risk assessment. Trade unions must be involved in the whole process from identifying hazards and risks and taking steps to prevent them and women workers/women trade union representatives should always be included to ensure that the risk assessment and its implementation is gender-responsive.

Risk assessments and impact assessments should be recognised and carried out as a component of a broader human rights due diligence (HRDD) process. The ITF's Supply Chain Principles provide a framework for how governments, transport buyers, employers, investors and all actors can cooperate with the ITF and its affiliates to carry out risk assessments as part of HRDD.

RISK ASSESSMENT AND ILO CONVENTION 190 AND RECOMMENDATION 206

C190 requires risk assessment to identify violence and harassment, at Article 9(c).

R206 provides guidance on factors to be taken into account – all of which are relevant to commuting – when carrying out risk assessments at **paragraph 8**.

ILO CONVENTION 155 – OCCUPATIONAL SAFETY AND HEALTH

Alongside C190, the provisions of Convention 155 must be complied with, particularly **Article 19**, which sets out employers' obligations including having arrangements in place.

EXAMPLES OF RISK FACTORS

Violence and Harassment

Commuting carries the risk of exposure to third party violence and harassment, for example when working in public places or walking to and from public transport stops.

For public transport workers, the commute often takes place within their workplace. They are not just using the service, they are part of the service, interacting with members of the public, which may expose them to additional risk of violence and harassment.

The stress of commuting in dangerous situations, for example when public or private transport is not available (for example when services have closed for the night) workers may have to resort to hitchhiking, cycling or walking at night.

Lack of suitable and convenient public transport

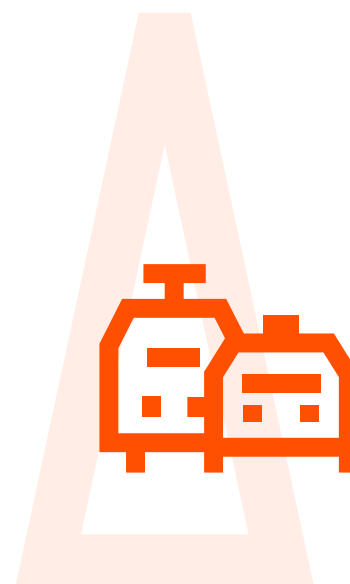
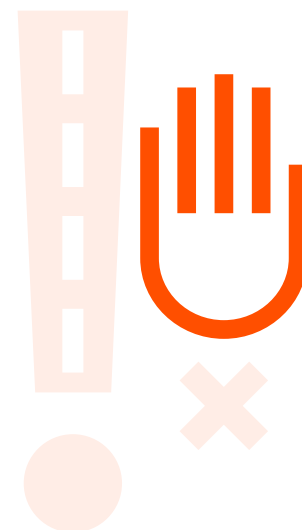
Workplaces may be isolated or remote, potentially putting workers at risk and making commuting even more difficult. C190 recognises working in isolation as a key risk factor for exposure to violence.

Workers whose home is too far from their work to make daily commuting practicable have the difficult choice of unaffordable rents nearer the centre of cities or sleeping at their workplace, which may put them in danger.

The workplaces or the places where workers start and finish work are often located in industrial/logistics areas outside cities, which may be in unsafe areas and are difficult to reach by public transport.

Understaffing (for example at railway stations) puts both staff and transport users at risk of violence.

Infrastructure (for example at airports or warehouse distribution centres) may not include parking at all for staff, and if this is provided it may be unsafe (e.g., poorly lit, no security staff, positioned in a remote location or in an industrial area). Parking safely nearer the workplace may be unaffordable.



EXAMPLES OF OTHER ISSUES WHICH NEED TO BE CONSIDERED IN COMMUTING RISK ASSESSMENTS

Journeys

Many transport workers have lengthy journeys to and from work, which in large cities are often multi-modal – so they may arrive at work already tired and stressed.

Stress can be induced by congestion, crowding and unpredictability.

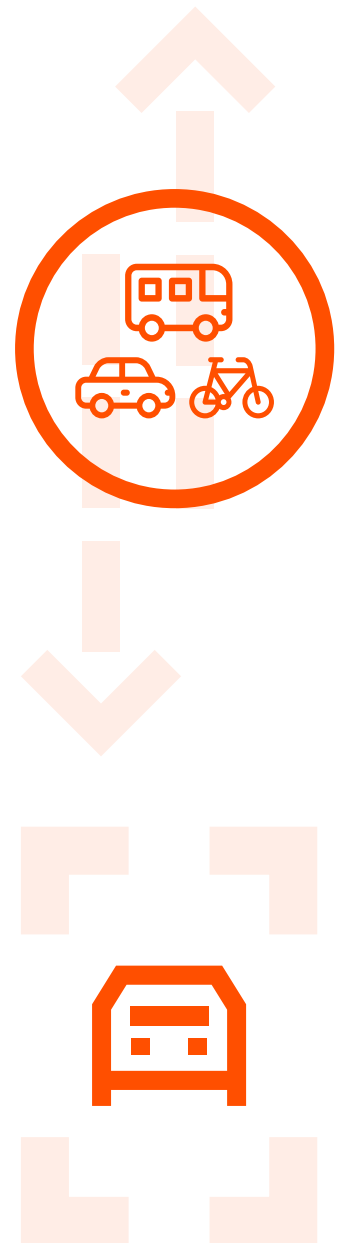
Employer-provided transport is not always suitable or available

Some employers provide transport to and from work for workers, but this is not always secure, properly maintained or otherwise compliant with safety requirements, and it is often reserved only for permanent workers.

Car parking

This may not be in places convenient or safe for workers to use it and may involve a long walk to the workstation in dangerous traffic or potentially violent areas.

Courts in the USA have considered evidence of conduct outside of the workplace, including in a non-workplace parking lot, as relevant to whether there was a hostile work environment (Crowley v L.L Bean, Inc. 303 F.3d 386, 409–10 [1st Cir. 2002]).



Difficulty in accessing welfare facilities at work add to health and safety risks of commuting

Having to be mobile **within** work (including when changing rooms, rest rooms or sanitary facilities are not located close to the workstation).

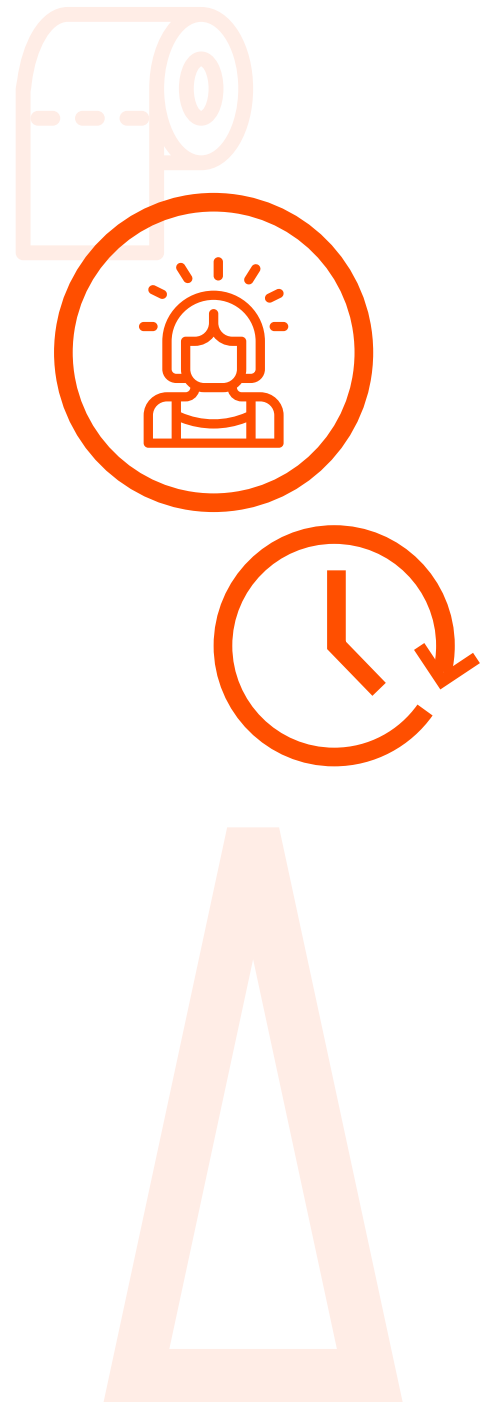
Having no fixed workplace or working alone in remote workplaces.

Shift work and working hours may add to the impact on the health and safety of transport workers who are commuting

Shift work and 24-hour operations are widespread in the transport industry, whether it is in urban transport, civil aviation, warehousing and road, rail, and sea transport. Research has shown that working shifts, particularly night shifts, can seriously affect the health and safety of workers, both women and men, contributing to a poor work-life balance and creating challenges for workers' caring responsibilities, the majority of which are borne by women.

Shift work often involves early starts and late finishes, long and irregular shifts and/or travel to and from work during unsocial hours, for example cleaners, and ticket sellers and drivers who start and finish their shifts at night outside the hours of the public transport they are helping to run.

Although less disruptive than night work, early morning starts can also reduce sleep and increase the risk of fatigue and ill health. Lack of appropriate transport to enable safe commuting will only aggravate the situation.



Fatigue:

which may be exacerbated by commuting and shift work/long hours.

Extremes of temperature:

too hot or too cold, including in vehicles and vehicle cabs and in public transport, is a serious health hazard for transport workers.

Road traffic hazards:

these include dangerous and congested road systems in cities and around access to ports and airports which add to the risk of collisions, adverse weather conditions and road rage.

Climate change:

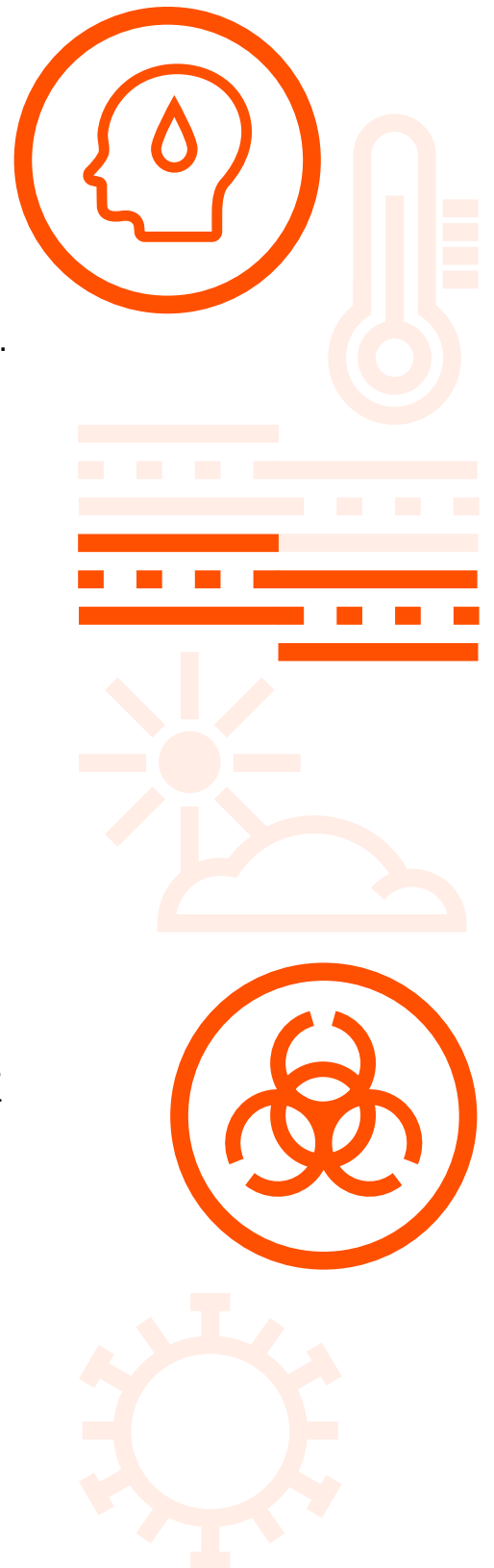
extreme weather events such as tornadoes and rapidly deteriorating situations created by flooding and landslides, which not only affect workers' ability to get to work but put them in danger en route.

Exposure to hazardous substances and polluted air:

such as dust, particulates and vehicle engine exhaust emissions which may cause or exacerbate health problems such as cancer and respiratory ill-health.

Exposure to biohazards:

Biohazards such as Covid-19 and other contagious diseases put workers in public-facing jobs and when commuting at risk of infection, especially on public transport and in other shared spaces such as sanitation facilities, airports, car parks, bus, metro and railway stations and interchanges, motorway service areas, and ships, including cruise ships, and ports. Exposure to biohazards may be accompanied by violence, for example there have been spitting incidents against women transport workers.



THE RISK ASSESSMENT PROCESS: SUGGESTED ACTION POINTS

1. WHAT IS THE PROBLEM WITH COMMUTING?

Ask workers, for example, to carry out a confidential and anonymous survey, share the results with members and agree the collective action to be taken going forward, for example feeding information into risk assessment.

A good example of a [survey form](#) is published by Unite the Union, Great Britain, as part of its 'Get ME home safely' campaign pack.

Other resources include the ILO Vision Zero Fund's [Collective Action for a Safe Commute](#), an action manual for employers and workers in the garment and footwear sector to enhance workers' commuting safety, which includes advice and checklists on the issues to be addressed.

2. OSH POLICY

Is there a jointly agreed world of work policy and procedures addressing OSH during the commute, including preventing sexual harassment and violence?

If there is a policy, has it been developed in consultation with trade unions/via the joint OSH committee?

Is it up to date? Does it cover all workers? Do the policy, procedures and practice encourage reporting of incidents free from retaliation or stigma? Does the policy integrate women transport workers' concerns? Is it kept under regular review to reflect changes such as legislation, working practices, working hours, reports of incidents, new and emerging risks?

If there is no policy, negotiate one. The text of C190 and R206 can help with bargaining and bargaining language.



A person sitting in a bus, Butwal, Nepal. Source: Unsplash, Ravi Sharma

3. THE EMPLOYER MUST CARRY OUT AND IMPLEMENT RISK ASSESSMENTS IN CONSULTATION WITH TRADE UNIONS

The ILO's [A Five Step Guide](#) on risk assessment is a useful general reference point though it does not specifically address gender issues or the commute.

The five steps:

- 1** Identify the **HAZARDS**.
- 2** Identify **WHO** might be harmed and how.
- 3** **EVALUATE** the risk – identify and decide on the safety and health risk control measures.
- 4** Record **WHO** is responsible for implementing **WHICH RISK** control measure and the **TIME** frame.
- 5** **RECORD** the findings, **MONITOR** and **REVIEW** the risk assessment, and **UPDATE** when necessary.

Some countries have developed useful resources in consultation with social partners, for example the Canadian government's [Workplace Harassment and Violence Risk Assessment Tool](#).

GENDER-RESPONSIVE RISK ASSESSMENT AND COMMUTING

A crucial issue is a lack of understanding of the problems facing women transport workers.

Any discussions around OSH and commuting must integrate a gender-responsive approach to commuting risk assessment. This is essential to protect all transport workers and requires consideration of many intersecting factors depending on the particular situation.

Be proactive and include women workers at all stages to ensure that their views are heard and implemented.

Integrate within the OSH processes.

Inform women and men workers about the workplace risks and hazards that have been identified including those associated with the commute.

Train women and men workers on risk assessment and prevention strategies.

Involve women and men workers in the process and in developing and monitoring prevention strategies.

GENDER-RESPONSIVE RISK ASSESSMENTS SHOULD EXAMINE THE COMMUTE IN THE CONTEXT OF:

The characteristics of jobs dominated by men and those dominated by women, and how these relate to the commute.

The specific features of jobs: what, when, how, for how long?

The biological differences between women and men and their respective exposures or responses to chemicals and biological hazards and other hazards.

Whether workplaces are suitable for all workers, for example in relation to provision of appropriate sanitation and changing facilities, in accordance with the ITF's Transport Workers' Sanitation Charter, especially in relation to the commute.

The different responsibilities of women and men in society as well as at work.

Useful resources on gender and risk management have been developed by the ILO and the European Agency for Safety and Health.



CHECKLIST:

Some examples of practical measures for safe commuting to be adopted by employers in consultation with transport workers and their representatives

Many women note that having access to reliable and secure transportation provided by their employer has given them the confidence they sought.

With growing awareness of the challenges women face during their commute, organisations are prioritising implementing employee transport solutions that cater specifically to the safety needs of their female workforce.

National Union of Seafarers of India (NUSI)³²

PUBLIC TRANSPORT

If employees use public transport to travel to and from work, consider the hazards for the total door-to-door trip, for example, asking whether there are contractual requirements to wear seat belts and advising workers of their obligations to wear these.

EMPLOYER-PROVIDED TRANSPORT OR TRANSPORT SUBSIDY

If public transport is not available, provide transport free of charge for all workers whatever their employment status, especially those who are obliged to commute at unsocial times or work or start and finish work in places where there is no public transport access, such as warehousing located in industrial/logistics areas outside cities.

Employer-provided transport should be in a type of vehicle appropriate for passenger use, maintained by trained staff/mechanics, regularly inspected for safety, provide seats and seatbelts for all passengers, not be overloaded, stop at safe pick-up points, and

have a competent driver. First aid kits should be provided and safety requirements should be spelt out in formal contracts between the employer and transport provider, and the employer should monitor the service.

Transport subsidy and safe solutions in the absence of public transport (e.g., paid taxis or minibuses) should be provided and negotiated with the trade unions.

TRAVEL TO WORK IN THEIR OWN VEHICLE

Where workers are obliged to travel to work in their own vehicle, provide safe and secure parking for their cars, bicycles, motor bikes and work vehicles close to the workplace for **all** workers – employees, informal workers³³ and workers in non-standard forms of employment such as sub-contractors and gig workers. This should be supervised by directly employed security staff, be well lit and be clear of any obstructions, such as bushes and trees, which may provide cover for perpetrators of violence.

SAFE ACCESS TO INDUSTRIAL PARKS, PORTS ETC FOR WORKERS

Access to these areas can be extremely hazardous if not managed safely. Employers should work with each other and with the authorities responsible for road transport infrastructure to ensure safe access for workers, whether travelling on transport or as pedestrians to these areas, for example, introducing speed limits, speed bumps, separating pedestrians from vehicles, pedestrian crossings and designating specific access routes to workers.

EMERGENCIES

Inform workers of ways of keeping in touch when commuting, for example, providing a 24-hour staffed telephone line and providing workers with the phone number of the emergency service.

TRAINING

Provide awareness raising and practical training on reducing the risks of road traffic accidents such as wearing seatbelts or helmets, awareness of speed limits and traffic regulations, and particularly for workers who use their own vehicle to travel to and from work.

FLEXIBLE WORKING HOURS

Arrange working hours to accommodate individual workers' caring responsibilities such as childcare and elder care.

MANAGE "INNER COMPANY COMMUTING" SAFELY

For example, in the transport world of work there is often a significant distance between sanitation facilities, changing rooms, car parks and the place where people work. These need to be located in convenient and accessible places.

WORKERS AWAY FROM HOME FOR LONG PERIODS

Many transport workers are often mobile for long periods away from home, such as airline workers, truck drivers and cruise ship workers, who will often arrive at places unfamiliar to them. They will often be tired and disorientated which will add to the risk.

Preventive action should include (this is not exhaustive):

If a worker has to travel several days to reach their workplace, arranging working hours to minimise fatigue, for example building in a rest period before they start work.

Procuring and providing safe and appropriate local transport and information about local transport and services; and safe, clean, appropriate and secure accommodation.

In the case of seafarers, complying with and implementing relevant provisions of the Maritime Labour Convention including provisions on repatriation at no cost to the seafarer.

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