

# **Travelife's broken promises to hotel workers**

A study of labour rights at hotels in Turkey contracted by Apollo (Kuoni), Fritidsresor (TUI) and Ving (Thomas Cook)



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Schyst resande is a network of seven organizations – Unionen, Fair Trade Center, the Swedish Hotel and Restaurant Workers Union, the Church of Sweden, Church of Sweden Youth, Union to Union and the IOGT-NTO movement. The network believes that tourism can contribute to sustainable development, but only if travelers and the tourism industry take responsibility for their social, economic and environmental impacts.

<http://www.schystresande.se>

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# 1. Executive summary

A revision of the Travelife standard titled “Travelife Standard for Hotels and Accommodations” was launched on January 1, 2014. The standard covers the areas of sustainability management systems, environmental management, labour and human rights, community integration, suppliers and customers.

This report scrutinizes the Travelife system both in theory and in practice. It serves to ask the question: What positive improvements have been achieved and which challenges still exist? The criteria of the standard are compared to international labour and human rights standards. The review of the standard comprises a combination of interviews with workers at Travelife certified hotels and non-certified hotels in Turkey. The hotels are connected to three of Sweden’s biggest tour operators: Apollo (Kuoni)<sup>1</sup>, Fritidsresor (TUI) and/or Ving (Thomas Cook).

The evaluation of the Travelife criteria uncovered fundamental flaws: the absence of core labour standards such as freedom of association and the right to collective bargaining, along with a lack of references to international labour rights standards such as the ILO core conventions.

According to Schyst resande’s interviews with hotel workers in Turkey, violations of the local labour law as well as international human and labour rights occur at the hotels. The most severe violations are related to breaches of freedom of association, low wages and a lack of occupational health and safety. Many workers are afraid to join a trade union, cannot survive on their incomes and are suffering from work related injuries and/or stress. In addition, they are vulnerable and have little access to social security because of the seasonal employment and they do not get proper overtime payments.

The interviews also reveal that breaches of the Travelife standard occur at Travelife certified hotels. Clear violations of the standard have been found regarding labour and human rights related to the terms or conditions of employment including wages, overtime payment, effective grievance procedures and employee training procedures. In addition, there are indications of possible breaches of the Travelife standard concerning working hours and workplace discrimination.

When comparing the Travelife certified hotels with the non-Travelife certified hotels in the study, there are almost no differences in their compliance with labour and human rights standards. It is also discouraging that no substantial improvements regarding working conditions in the hotel sector in Alanya 2015 were discovered, compared to the situation in 2012.

From this field study emerges findings that truly question the quality and credibility of the Travelife standard. A big gap is discovered between the criteria of the standard and the hotel workers’ experiences of violations of labour and human rights. The report raises important questions for Travelife concerning the inefficiency of the certification method and also questions the sustainability work of the tour operators Apollo, Fritidsresor and Ving at a broader level. Violations of labour and human rights in the hotel sector in Turkey were revealed by Schyst resande as early as 2012, and the findings of this report confirm that the tour operators have failed to take action to address the violations.

Schyst recommends that Travelife takes the necessary steps to improve the quality of the audits, to seek support from Apollo, Fritidsresor and Ving and share experiences with and learn from multi-stakeholder initiatives such as Fair Wear Foundation and Ethical Trading Initiative. Apollo, Fritidsresor and Ving should make sure that all accommodations in their supply chain comply with national labour law. Further more, they should conduct risk analysis, take action to mitigate violations, reward hotels with a better social performance and support consumers in making more sustainable travel choices.

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<sup>1</sup> In June 2015 Kuoni announced that DER Touristik, the travel division of REWE Group, is acquiring Apollo. The transaction is expected to be completed in the third quarter of 2015, <http://www.kuoni.com/group/group-news/ad-hoc-news/2015/tour-operating-units>

# 1. Introduction and aim of the report

The Travelife Standard for Hotels and Accommodations (hereafter called Travelife and the Travelife standard/certification) is an ethical and environmental standard within the tourism sector. During the past few years, the Travelife standard has been revised and on January 1, 2014, the new Travelife standard was launched.

The aim of this report is to investigate how the new Travelife standard integrates labour rights and human rights. The report also seeks to make the voices heard of the employees at Travelife certified hotels in Turkey concerning working conditions and investigate if there are any differences between the working conditions at Travelife certified hotels and non-certified hotels.

In the end of the report, Schyst resande provides recommendations to Travelife and the three biggest Swedish tour operators that sell package holidays to Travelife certified hotels to Swedish consumers; Apollo (Kuoni), Fritidsresor (TUI) and Ving (Thomas Cook).

In 2011, Schyst resande made a review of the Travelife standard. The report saw Travelife as a positive opportunity for dialogue within the tourism sector and for developing policies concerning environmental protection and human and labour rights. But the report also criticized Travelife for not referring to international conventions and laws concerning environmental protection and human rights. Furthermore, the report pointed to a lack of transparency since the criteria that were used to assess the hotels' performance on social and environmental responsibility were not disclosed. This made it impossible for consumers and civil society to evaluate the information that Travelife presented. The credibility of the standard was also questioned, since the standard is a business driven initiative where the audits were conducted by the travel operators themselves and not by independent auditors. The length of time the auditors spent at the accommodations in order to conduct Travelife audits were also viewed as too short for the necessary information gathering.<sup>2</sup>

In 2012, Schyst resande and Fair Trade Center revealed violations of labour rights at hotels certified by Travelife in Turkey in the report titled No place in the Sun. According to interviews with hotel workers, the Travelife certified hotels had engaged in illegal overtime, lack of overtime compensation and discrimination of female employees occurred at Travelife certified hotels. In addition, workers reported that the wages were too low to cover their basic needs, and they did not feel free to join a trade union. In addition, they reported problems regarding health and safety and a lack of safety training. Travelife certified hotels had a positive trend concerning that all employees had written employment contracts and a higher percentage of the employees interviewed at Travelife certified hotels had received training in health and safety, compared with the workers at non-Travelife certified hotels in the study.<sup>3</sup> This report will also present a brief comparison between the findings of the working conditions revealed at hotels in Turkey in 2012 and now, three years later.

It takes a credible product label to reach out to consumers and also keep their trust. According to the Swedish Trade Federation, 27% of Swedish consumers rank ethics and good corporate social performance as very important within the tourism sector. There is clear consumer interest in products and services that are ethically and/or environmentally sustainable. However, in most cases, consumers are generally dissatisfied with the information given from companies concerning sustainability issues. Consumers expect that information is readily available when they need it. They demand that such knowledge is accessible and can be easily understood, as opposed to having to make an effort to search to find it. Consumers also report that they receive information concerning these issues mainly through product labeling.<sup>4</sup> This increasing demand for sustainable products and services, gives the Travelife standard a significant marketing opportunity.

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2 Schyst resande 2011, En granskning av Travelife Sustainability System, (A review of the Travelife Sustainability System), <http://www.schystresande.se/schyst-resandes-material>, p. 46-47

3 Schyst resande and Fair Trade Center 2012, No place in the Sun (Ingen solskenshistoria), [http://fairtradecenter.se/sites/default/files/Rapport\\_Ingen\\_solskenshistoria.pdf](http://fairtradecenter.se/sites/default/files/Rapport_Ingen_solskenshistoria.pdf), p. 44

4 The Swedish Trade Federation, Det ansvarsfulla företaget 2014 (The responsible company 2014), [http://www.svenskhandel.se/globalassets/\\_gammalt-innehall/csr/det-ansvarsfulla-foretaget-2014.pdf](http://www.svenskhandel.se/globalassets/_gammalt-innehall/csr/det-ansvarsfulla-foretaget-2014.pdf), p. 25

## 2. Method

The purpose of this report is to investigate to which degree the Travelife standard is compliant with international norms for human and labour rights. The report covers both the Travelife standard in theory as well as a field study of the actual social performance of hotels in Alanya, Turkey. The environmental aspects of the Travelife standard and the tourism sector are not in focus of this report. The report is written by Fair Trade Center on behalf of Schyst resande.

The study sample consists of 33 hotel workers who have been interviewed, at across a total of 10 hotels in the Alanya area. There are five hotels that have been certified by Travelife's new standard Gold Award, while the remaining five of the hotels are not certified by Travelife. Non-certified hotels were included to be able to compare their social performance with certified hotels. All hotels are connected to Swedish tour operators Apollo (2 Travelife hotels and 1 non-Travelife hotel), Fritidsresor (1 Travelife hotel and 3 non-Travelife hotels) and/or Ving (2 Travelife hotels and 1 non-Travelife hotel). In 2012, seven of the hotels in this study were also interviewed for the report previously mentioned, No Place in the Sun. To see if there are any differences in working conditions between trade unionized and non-unionized hotels, one of the selected non-Travelife hotel is a trade unionized workplace.

For ethical reasons, we have made some information in this report confidential. In order to prevent any direct negative implications for the local individuals and companies/accommodations, the names of the hotels and workers are not mentioned in the report. The interviewed hotel workers in Turkey do not constitute a representative sample but the results can be seen as an indication of the challenges regarding working conditions in the hotel sector.

From the interview sample, 20 of the interviewees are employed by hotels that have received the Travelife certification, and 13 of the interviewees are employed at non-Travelife certified hotels. The female to male ratio consists of 17 women, and 16 men, all between the ages of 18-46 years old. The positions held by the employees consists of 16 hotel housekeepers and the rest of the interviewees are bartenders, waiters, chefs, bellboys or receptionists. The interviews were conducted with randomly selected employees, sometimes in the hotel area but without hotel management knowledge, and when possible outside of the hotel area. Interviews were also conducted with two local trade unions in the hotel sector and with the hotel management of one Travelife certified hotel.

Turkish human rights researchers Bilge Seçkin Cetinkaya and Aynur Eylem Polat conducted the interviews in April 2015. The locally based researchers have extensive experience in doing interviews with workers in the hotel sector and in the garment industry. Bilge Seçkin Cetinkaya also worked as an auditor for Fair Wear Foundation, a multi-stakeholder initiative that works with companies and factories to improve labour conditions for garment workers, and is thus very familiar with the challenges concerning labour rights and industrial relations in Turkey.

A questionnaire<sup>5</sup> was sent to Travelife regarding compliance with international norms for human and labour rights and written responses were received in April 2015. Clarifications were discussed during a Skype call the same month with Travelife's Business Manager Sören Stöber and Relationships Manager Fiona Humphries. Travelife has had the opportunity to correct the facts in the report regarding the standard.

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5 Appendix: Questions to Travelife



***According to the Swedish Trade Federation, 27% of Swedish consumers rank ethics and good corporate social performance as very important within the tourism sector.***



## 3. The Travelife standard

### 3.1 About Travelife

In 2007, Travelife was founded by the UK trade associations ABTA and ECEAT-Projects, a Dutch not-for-profit organization promoting sustainability in tourism. Leeds Metropolitan University (UK), Lund University (Sweden) and the Dutch travel association ANVR supported the launch of the initiative. The methodology of Travelife was developed during a European Union supported project called LIFE.<sup>6</sup> Travelife Ltd. is owned by ABTA and supported by major European trade associations and tour operators like Thomas Cook, TUI and Kuoni.<sup>7</sup>

Travelife has launched two different sustainability systems. One is aimed for travel companies and is called the “Travelife Sustainability System for Tour Operators and Travel Agencies” and the other one is named “Travelife Standard for Hotels and Accommodations”.<sup>8</sup> This report only focuses on the second standard.

Travelife has 1,300 members in total among accommodations and hotels, which represent a small percentage of accommodations globally, according to Travelife.<sup>9</sup> The Travelife membership exists in three different stages where a company reaches Travelife certification on the last stage of membership. The membership fee for the certification depends on the country and the size of the property, ranging between € 800 for smaller and € 1,400 every two years for very large companies.<sup>10</sup>

### 3.2 Travelife Standard for Hotels and Accommodations

The new standard of Travelife for hotels and accommodations was launched January 1, 2014. During the revision of the Travelife standard, the consultation considered and applied the views of international bodies and NGOs. Travelife is a member of the Roundtable on Human Rights in Tourism alongside Tourism Watch and other NGOs.<sup>11</sup> The former three levels of certification; Bronze, Silver and Gold, do not exist anymore. According to the new system, hotel accommodations can only be certified by the Gold Award or the Award of Excellence. Another difference with the new standard is that the accommodations need to fulfill all the criteria of the standard to get certified. The revision of the Travelife standard have enhanced many areas in line with developments in sustainable tourism practice, including labour and human rights, according to Travelife.<sup>12</sup>

The standard covers the areas of sustainability management systems, environmental management (energy, water, hazardous substances, solid waste and wildlife) labour and human rights, community integration, working with suppliers and customers.<sup>13</sup> This report only analyses the labour and human rights part of the standard.

Since the application of the new standard, around 350 accommodations have been certified with the Travelife Gold Award and more than 10 million guests are staying at Travelife certified accommodations per year.<sup>14</sup> Travelife is a web-based standard which requires accommodations to monitor and self-assess their sustainability performance.<sup>15</sup> Hotels and Accommodations also undertake a third party audit which are corroborated with the requirements of the standard. If they

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6 Travelife’s website, [http://www.travelife.info/index.php?menu=about\\_travelife&lang=en](http://www.travelife.info/index.php?menu=about_travelife&lang=en)

7 Ibid. 150618, [http://www.travelife.org/Hotels/What\\_is\\_TL.asp?p=2](http://www.travelife.org/Hotels/What_is_TL.asp?p=2)

8 Ibid. 150427, [http://www.travelife.info/index.php?menu=about\\_travelife&lang=en](http://www.travelife.info/index.php?menu=about_travelife&lang=en)

9 Sören Stöber, Travelife Business Manager, Skype interview 150416

10 Sören Stöber, e-mail correspondence 150629

11 Sören Stöber, survey reply 150408

12 Sören Stöber, e-mail correspondence with 150629

13 Travelife Sustainability System for Accommodations Standard – Type I, [http://www.travelife.org/Hotels/documents/TL\\_standards.pdf](http://www.travelife.org/Hotels/documents/TL_standards.pdf)

14 Sören Stöber, survey reply 150408

15 Travelifes’ website, [http://www.travelife.org/Hotels/What\\_is\\_TL.asp?p=2](http://www.travelife.org/Hotels/What_is_TL.asp?p=2)

meet these requirements, they will achieve Travelife Gold Award certification.<sup>16</sup>

At the time of the writing of this report, the Travelife Award of Excellence is due for roll out as a pilot in 2015. The main differences between the Gold Award and the Award of Excellence is that the Award of Excellence requires that properties comply with all the requirements of the Global Sustainable Tourism Council criteria for hotels and accommodations and in addition those of the EU Eco-label for Tourism Accommodations. Both checklists are based on the Travelife standard.<sup>17</sup>

### 3.2.1 Analysis of the Travelife criteria regarding international human and labour rights

There are 12 criteria in the Travelife standard regarding labour and human rights. These criteria cover terms and conditions of employment, that employees can enter or leave their employment freely, wages, working hours, overtime, benefits, disciplinary procedures, representation of employees, discrimination, grievance procedures, child labour and training of employees.

This means that all areas of the eight ILO Core Conventions<sup>18</sup> concerning human rights at work are not covered in the standard since it does not have any specific criteria concerning freedom of association (FoA) and the right to collective bargaining. According to Schyst resande, this is problematic because the standard is missing two of the most fundamental rights at work. The checklist of the standard, which is used during audits (more information concerning the checklist below), does however have three questions regarding this topic: “Do you have evidence to show that all employees know, from the start, how they can contact senior management if they have a problem?”, “Do you allow your employees to join a trade union, if there is one?” and “Do you allow your employees to meet up in working hours, form an association and elect a spokesperson in order to discuss issues without management involvement?”<sup>19</sup> In the Travelife criteria, the term “representation of employees” means that all employees can seek representation from senior management about key employment issues.<sup>20</sup> This wording is not equal to the FoA and the right to collective bargain. It is problematic since distrust can exist or manifest between senior management and employees. In some cases, senior management could potentially be discriminating employees, thus making it hard for employees to seek representation from them.

The Travelife standard does not explicitly refer to any specific labour rights conventions except for the Rights of the Child and the ILO conventions of 138 and 182. Schyst resande asserts the importance of making clear reference to specific labour rights conventions, most especially the ILO core conventions. In doing so, the content of the standard becomes clearer. International conventions are detailed and concise, leaving little to no room for varying interpretation of what labour rights mean in practice. According to the United Nations Guiding Principles for Business and Human Rights, the ILO core conventions are a fundamental part of the internationally recognized human rights which all businesses have a responsibility to respect.<sup>21</sup> When Schyst resande raised this concern with Travelife during the production of this report, they responded that Travelife wants the standard to be workable and applicable for their members and not too complicated. But Travelife expressed the desire to have clear and open communication with stakeholders and they plan to discuss the issue and potentially update the standard in this regard.<sup>22</sup>

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16 Sören Stöber, e-mail correspondence 150629

17 Sören Stöber, survey reply 150408

18 ILO's eight core conventions covers: Freedom of association and the effective recognition of the right to collective bargaining (ILO convention no. 87 and 98); the elimination of all forms of forced or compulsory labour (no. 29 and 105); the effective abolition of child labour (no. 138 and 182); and the elimination of discrimination in respect of employment and occupation (no. 100 and 111): <http://www.ilo.org/global/standards/introduction-to-international-labour-standards/conventions-and-recommendations/lang--en/index.htm> <http://www.ilo.org/global/standards/introduction-to-international-labour-standards/conventions-and-recommendations/lang--en/index.htm>

19 Travelife Gold checklist, [http://www.travelife.org/Hotels/documents/checklist\\_type1.pdf](http://www.travelife.org/Hotels/documents/checklist_type1.pdf)

20 Travelife Sustainability System for Accommodations Standard – Type I, [http://www.travelife.org/Hotels/documents/TL\\_standards.pdf](http://www.travelife.org/Hotels/documents/TL_standards.pdf)

21 The Office of the United Nations High Commissioner for Human Rights (OHCHR) 2011, Guiding Principles on Business and Human Rights, Implementing the United Nations “Protect, Respect and Remedy” Framework, Principle 12, [http://www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR\\_EN.pdf](http://www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf)

22 Sören Stöber, Skype interview 150416

Regarding the living wage issue, the standard's criteria outlines that "The business pays employees at least a living wage that is equal to or above the legal minimum."<sup>23</sup> Schyst resande believes that this wording is contradictive since in many countries, there is a big gap between a living wage and the legal minimum wage, which this kind of criteria does not address. According to the Travelife standard criteria on wages, there is no definition or existing benchmark of a living wage. Travelife admits that the living wage issue is a big challenge. Travelife auditors should be aware of the local situation at the destinations and address this in the audits. But, according to Sören Stöber, Travelife Business Manager, "Travelife should not tell hotels what to pay, as a London-based organization. Local unions and governments have to play a part too and it can be very challenging for a small organisation to set or prescribe local living wages."<sup>24</sup>

Occupational health and safety (OHS) is mentioned in a criteria regarding training of employees. According to the criteria, accommodations are obliged to provide training regarding this issue, including a stated criteria regarding hazardous substances where it says that a system must be in place to manage the use of the chemicals. The checklist Travelife use during audits have one question related to OHS that states that all employees that handle chemicals should be given training and protective equipment, in line with national and international health and safety standards. Schyst resande thinks that the wording of the criteria should be complemented and clearly state that effective regulations shall be implemented to prevent accidents and minimize health risks as much as possible in accordance with ILO Convention 155<sup>25</sup>.

### 3.2.2 Subcontractors

All of Travelife's criteria regarding labour and human rights states that:

*"This criterion does not apply to businesses who only use the services of individuals who are not employed directly by the business i.e. contractors/agency staff."*

This is applicable to both the Gold Award and the Award of Excellence. But the audit checklists of the Gold Award and the Award of Excellence differs concerning the hotels responsibility for monitoring their supply chain.

The Travelife Gold Award checklist does not apply to the subcontractors of the hotels. Travelife does not audit the subcontractors of the accommodations (second-tier suppliers). As Sören Stöber, Travelife Business Manager says:

*"We are not there yet. In the perfect world, all suppliers should be covered. We have made it to the first step where we focus on the accommodations."*<sup>26</sup>

In contrast, the Award of Excellence requires the hotels to monitor their suppliers. The hotels' supply chain can include numerous suppliers such as local bakeries and laundries. The hotels are not only expected to send their sustainability policy to the supplier, the engagement has to go further and deeper. While the Award of Excellence is not fully developed yet, it is planned that the hotels will bear the main responsibility for monitoring their supply chain. Travelife says that it might be relevant for them to do "spot-checks in hot spots, like laundries in Thailand". Travelife also admits that many hotels do not have the capacity to monitor the supply chain, especially not smaller hotels.<sup>27</sup>

In the hotel sector, more and more businesses are run through management and franchise contracts, and many hotel departments are outsourced or subcontracted to external service providers. This means that many hotels have very few directly employed staff. According to the current Travelife criteria, hotels could get away with neglecting all responsibility for any bad treatment of workers that are not hired directly by the business, and still get certified.

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23 Travelife Sustainability System for Accommodations Standard – Type I, [http://www.travelife.org/Hotels/documents/checklist\\_type1.pdf](http://www.travelife.org/Hotels/documents/checklist_type1.pdf)

24 Sören Stöber, Skype interview 150416

25 ILO, [http://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100\\_INSTRUMENT\\_ID:312300](http://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_INSTRUMENT_ID:312300)

26 Sören Stöber, Skype interview 150416

27 Fiona Humphries, Travelife Relationships Manager, Skype interview 150416

According to the UN Guiding Principles on Business and Human Rights, the corporate responsibility to respect human rights requires companies to identify, address and mitigate human rights impacts with which they may be involved through their business relationships.<sup>28</sup> Recent research on the hotel sector, shows that severe human and labour rights violations can occur at subcontractors.<sup>29</sup>

Consequently, in order to ensure compliance with the UN Guiding Principles, responsibility for human and labour rights at subcontractors and for contract workers/agency staff needs to be incorporated into the Travelife criteria and the checklist for both the Gold Award and the Award of Excellence. Travelife should also ensure that adequate processes for monitoring the supply chains of the hotels are put in place.

### 3.2.3 Audits and breaches of the standard

When conducting an audit, two different checklists are used. One checklist is for small accommodations (that can accommodate up to 160 guests per night) and another checklist are used for medium to large accommodations (that can accommodate more than 160 guests per night).<sup>30</sup> During the revision of the Travelife standard, Travelife consulted with a range of properties to establish the most appropriate criteria for different sized accommodations. They identified several property types that had varying operational impacts – for example, the sustainability footprint of a larger hotel is very different to that of a small bed and breakfast – and took the decision to focus the different checklist types accordingly.<sup>31</sup>

The main differences between the checklist for small accommodation and the checklist for medium to large accommodations are related to the environmental criteria and there are almost no differences between accommodation types in terms of Travelife’s social criteria including labour and human rights.<sup>32</sup>

In 2014, Travelife conducted about 500 audits and all accommodations are re-audited every two years. All of the Travelife audits are conducted by independent Travelife-qualified, third party auditors. Only in exceptional circumstances does Travelife use internal auditors. All audits are announced.<sup>33</sup> One audit takes a minimum of six hours and a maximum of one day.<sup>34</sup>

Confidential staff interviews are a requirement of the Travelife criteria and properties must allow them to take place with no detrimental effect to their employees. To maintain the integrity of the interviews, the auditor selects a random sample using payroll records. Travelife’s auditors are required to randomly pick a selection of workers (a minimum of three) from low-level/low-paid occupations (for example housekeeping, kitchen). The selection process is done without hotel management involvement. Interviews with workers are held in private, they are confidential, no records are taken and they take place without the supervision of management.<sup>35</sup>

The Travelife standard also requires that all properties must have a grievance procedure in place, allowing employees to make formal complaints. But there is no common Travelife system for grievances, this should be handled by each accommodation independently.<sup>36</sup> Schyst resande asserts that a more effective way of handling grievances would be to set up common local complaints

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28 OHCHR 2011, Principle 13, [http://www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR\\_EN.pdf](http://www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf)

29 Fair Trade Center and Schyst resande 2014, Fortsatt tvångsarbete på underleverantör till Fritidsresor och Ving (Continued forced labor at Fritidsresor’s and Ving’s subcontractor), <http://fairtradecenter.se/sites/default/files/Granskning%20tv%C3%A4tteriet%202014.pdf>

30 Travelife Gold Checklist Type I and Type II Accommodations, [http://www.travelife.org/Hotels/documents/checklist\\_type1.pdf](http://www.travelife.org/Hotels/documents/checklist_type1.pdf) and [http://www.travelife.org/Hotels/documents/checklist\\_type2.pdf](http://www.travelife.org/Hotels/documents/checklist_type2.pdf)

31 Sören Stöber, survey reply 150408

32 Ibid.

33 Ibid, survey reply 150413

34 Ibid, meeting with Schyst resande 141104

35 Ibid, survey reply 150413

36 Ibid, survey reply 150408

procedures that all employees at Travelife certified hotels could use. This would make the process safer for workers using the system as well.<sup>37</sup>

Audits are also used as a tool to understand relevant structural issues at the destinations. The idea in the long-term is to compile data from the audits to be able to use the information to influence public policy via ABTA (the UK travel association) and the tour operators, for example.<sup>38</sup>

The auditor will hold a meeting with the Travelife implementation team once the audit has been completed, where they will clarify and discuss any outstanding issues. They will then write an audit report, which is verified by Travelife head office and then the result is communicated to the Travelife lead at the accommodation. The Travelife lead will then communicate the audit result to the hotel staff.<sup>39</sup>

According to Travelife, the most common breaches of the standard at the accommodations are related to monitoring energy and water consumption, managing solid waste, particularly food, managing hazardous substances, child protection and sustainable procurement policies. The most difficult breaches to address are managing solid waste, managing hazardous substances and child protection.<sup>40</sup> Breaches of human and labour rights are not mentioned by Travelife as common breaches or breaches that are difficult to address. Schyst resande thinks this is very strange, since earlier research in Thailand and Turkey 2012 and current research in Turkey reveals several examples of violations of human rights and national labour law at hotels and in their supply chain (detailed information could be found in the chapter about field study findings). If the monitoring process of the Travelife standard fails to reveal violations of human and labour rights, the certification system needs to be improved to find and address these violations.

Travelife is not in contact with trade unions on a regular basis and has not been in contact with the International Union of Food, Agricultural, Hotel, Restaurant, Catering, Tobacco and Allied Workers' Associations (IUF). Travelife says that they do not have the time or the resources to be in contact with local trade unions in different countries and today they do not have the right contacts to the unions either. Since Travelife covers many areas, both environmental and social issues, there are very many NGOs to be in contact with, according to Travelife. The local auditors are sometimes in contact with unions or use their websites as information sources.<sup>41</sup> Schyst resande strongly believes that Travelife could benefit from a dialogue with the trade union in many ways and should consider establishing contact with the global trade union federation IUF. The global trade union could share contact details to their affiliates on a national and local level and share their expertise on labour rights in the hotel sector, and help to develop the appropriate grievance methods. Local trade unions have relevant information about working conditions at hotels that Travelife auditors could use to complement the hotel audits. Travelife could also explore the possibility to use proactive freedom of association (FoA) and workers' participation methods, such as guarantees of freedom of association and trade union access.<sup>42</sup>

If a property does not comply with a criteria requirement during their third party audit, they will not attain Travelife's Gold Award certification. They then have 30 days to put in place improvements and to provide evidence that they have complied with the criteria. If the breaches are substantial, Travelife will execute a re-audit of the hotel. A re-audit has been executed a couple of times, according to Travelife. If a property is able to address all their non-compliances within 30 days, then they will achieve Gold Award certification. If an audit reveals too many breaches of the standard, the hotel cannot get certified or loses the certification. Right now there are not a fixed limitation

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37 Fair Wear Foundation has a complaints procedure that Travelife could learn from, <http://www.fairwear.org/514/about/verification/>

38 Sören Stöber, Skype interview 150416

39 Ibid, survey reply 150413

40 Ibid, survey reply 150408

41 Ibid, Skype interview 150416

42 For an explanation of these methods, read Fair Trade Center's report "Living wage – from dream to reality" [http://fairtradecenter.se/sites/default/files/rapport\\_levnadslon\\_EN\\_10042015.pdf](http://fairtradecenter.se/sites/default/files/rapport_levnadslon_EN_10042015.pdf), 11-14

on how many breaches that are allowed, or how much compliance that is needed to get certified. Travelife is currently working on such a limitation.<sup>43</sup>

The accommodation is solely responsible for complying with all the requirements of the standard. The tour operators contracting the accommodation do not carry any responsibility for improvement measures or supporting the accommodations in fulfilling the criteria. However, different tour operators work with their suppliers to facilitate improvements, but this is on a voluntary basis and not a regular part of the Travelife standard.<sup>44</sup>

### *3.2.4 Education material and trainings*

When the new Travelife criteria was launched, Travelife developed new materials for their members that was meant to help members prepare for future audits with the goal of reaching the standard. Travelife has developed fact sheets on 20 different subjects including fair employment, grievance procedures etc.

Travelife does not arrange specific trainings on how to meet the criteria for its members, although they regularly organize workshops, to spread word about Travelife to hotels. They put a lot of effort and time on raising awareness among their members and hotels.

“Communication and demystifying sustainability is very important, as well as making the principles workable in practice.” says Fiona Humphries, Travelife Relationships Manager.<sup>45</sup>

Travelife stresses that they cannot be a certification body and a consulting firm at the same time, so there is a limitation to how much they can help the hotels to comply with the standard.<sup>46</sup>

Travelife educates their auditors and the auditor training explains the role of human rights and the impact it has on labour issues. The auditors also receive guidance on how to audit Travelife’s social criteria. In terms of local labour laws, auditors are expected to research the local legal context to ensure they understand the employer obligations. All Travelife auditors are selected because of their academic qualifications, skills and previous experience.<sup>47</sup>

Travelife does not arrange any extra training for employees at the accommodations as this responsibility rests solely with the accommodations. According to the standard, the accommodations should provide employees with the appropriate training when they start working for the company. This is to be followed with a regular refresher training regarding their right to fair working conditions and benefits and their role in supporting and protecting human rights, among other things.<sup>48</sup>

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43 Sören Stöber, survey reply 140408 and Skype interview 150416

44 Ibid, interview 150416

45 Fiona Humphries, Skype interview 150416

46 Sören Stöber, Skype interview 150416

47 Ibid, survey reply 150413

48 Travelife Sustainability System for Accommodations Standard – Type I, criteria 3.12



*The Travelife criteria lack references to international labour rights standards, such as the ILO core conventions, and do not cover freedom of association and the right to collective bargaining.*

## 4. The Swedish tour operators' engagement in Travelife

### 4.1 Apollo

Apollo is Sweden's third largest tour operator after Fritidsresor and Ving and is owned by the Swiss travel group Kuoni, although Kuoni has announced that the company will be sold to REWE Group.<sup>49</sup> Apollo belongs to Kuoni Nordic along with Apollo in Norway, Denmark and Finland. Kuoni Nordic has nearly 1,000 employees and a total of 1 million travelers annually to destinations worldwide.<sup>50</sup>

Apollo has offered Travelife certified hotels since 2009. The standard search function on the company's website does not include a filter for finding hotels with sustainability certification. Consumers can however find information about which hotels that are certified both under each hotel's webpage and under a special headline where you find the whole list of Travelife certified hotels that Apollo offers.<sup>51</sup> Unfortunately, this information is not up to date. The list is from 2013 and Apollos general information on Travelife is divided into the former certification levels of Travelife bronze, silver and gold.<sup>52</sup> According to the list, Apollo offers 66 certified hotels. Another page at the website with the headline "Sustainable hotels" (Hållbara hotell) offers another list of Travelife hotels where 62 Travelife hotels are present, certified by the old scheme of gold, silver and bronze.<sup>53</sup> According to a press release from Apollo, they offer almost 100 certified hotels.<sup>54</sup> The press release does not state if the hotels are certified by the new or the old Travelife criteria.

In addition, no information is available on Apollo's website about the current certification scheme which offers only two levels, and with a new set of criteria. This makes it challenging for consumers to find accurate information from Apollo on their current offer of Travelife certified hotels.

In 2015, Apollo was the first Scandinavian tour operator to be certified according Travelife's criteria for tour operators, "Travelife Sustainability System for Tour Operators and Travel Agencies". The certification concerns sustainability management and all processes around purchasing, personnel, suppliers, responsibility at the destinations and communication with customers.<sup>55</sup>

### 4.2 Fritidsresor

Fritidsresor is a part of TUI Nordic together with other brands on the Scandinavian market such as Danish and Norwegian Star Tour, Finnish Finnmatkat and TEMA. Fritidsresor is the biggest tour operator at the Swedish market and TUI Nordic has a 20 percent Nordic market share. TUI Group is the world's leading tourism group, with operations in more than 180 destinations worldwide and the group has about 77,000 employees in 130 countries and 30 million customers annually.<sup>56</sup>

As with the case of Apollo, the information about Travelife at Fritidsresor's website is not updated. Fritidsresor refers to the three levels of Travelife that does not exist anymore (bronze, silver and gold).<sup>57</sup>

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49 In June 2015 Kuoni announced that DER Touristik, the travel division of REWE Group, is acquiring Apollo. The transaction is expected to be completed in the third quarter of 2015, <http://www.kuoni.com/group/group-news/ad-hoc-news/2015/tour-operating-Units>

50 Apollo's website: <http://www.apollo.se/om-apollo/fakta-och-siffror>

51 Ibid, <http://www.apollo.se/om-apollo/en-battre-resa/for-dig-som-reser/res-ansvarsfullt/bo-hallbart>

52 Ibid, <http://www.apollo.se/om-apollo/en-battre-resa/en-hallbar-leverantorskedja/travelife-sustainability-system>

53 Ibid, <http://www.apollo.se/hotell/travelife-guld>

54 Apollo's press release, 150305: <http://www.mynewsdesk.com/se/apollo/pressreleases/apollo-tar-taeten-paa-csr-omraadet-bliir-foersta-nordiska-researrangoer-att-haallbarhetscertifieras-av-travelife-1126376>

55 Ibid.

56 Fritidsresor's website: <http://www.fritidsresor.se/om-fritidsresor/om-foretaget/>

57 Ibid: <http://www.fritidsresor.se/om-fritidsresor/reko-resande/miljocertifiering/miljocertifieringssystem1/>



The standard search function on the company's website does not include a filter for finding hotels with sustainability certification. Fritidsresor does however offer a list of all eco-labelled hotels during the summer season 2015, available for download at the website. According to this list, Fritidsresor offers 110 Travelife certified hotels in total, but is not clear if the hotels are certified with the old or the new Travelife standard.<sup>58</sup> During the research of this report, Fair Trade Center found several examples of hotels that were on the list but did not have the new Travelife certification.

In Fritidsresor's contracts with new hotels, it is a requirement that the hotels should join Travelife. Fritidsresor argue that: "In this way we ensure that our partners are working actively on these issues for a sustainable business. Travelife does however not have any specific requirements for improvements in the same way as the eco-label ISO 14001, but gives an overall picture of and insight into the hotels' actual work."<sup>59</sup>

### 4.3 Ving

Ving and Globetrotter are part of Ving Sverige AB with approx. 180 employees and over 650,000 passengers annually. Ving Sverige AB is part of the international travel group Thomas Cook Group plc, listed on the London stock exchange. Ving offer tours to over 400 destinations in 50 countries.<sup>60</sup>

Ving has accurate information about Travelife on their website, where they also explain that the standard has changed from three levels to two. They also state that the hotels are being revised during 2015, so it is therefore more clear for the visitor of the website that hotels on Ving's Travelife list is now under revision. Ving offers 154 Travelife certified hotels and the tour operator's goal is that all Ving's own hotels such as Sunwing Family Resorts, shall be marked with Travelife's Award of Excellence, and that all Sunprime Hotels get the label Gold Award during 2015.<sup>61</sup>

The standard search function on the company's website does not include a filter for finding hotels with sustainability certification. Ving does however provide customers with a search tool, "Hotellhittaren" (The hotel finder), where it is possible to find the eco-labelled hotels easy, although there is not a way to more specifically find only Travelife certified hotels with that tool.<sup>62</sup>

Ving sees higher awareness in sustainable travel from consumers: the "Interest in Travelife and the increased awareness of environmental and social responsibility results in an ever-increasing number of hotels to join the Travelife program."<sup>63</sup>

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58 Ibid: <http://www.fritidsresor.se/PageFiles/14690/Milj%C3%B6m%C3%A4rkt%20hotell%20Sommar%202015.pdf>

59 Ibid: <http://www.fritidsresor.se/om-fritidsresor/reko-resande/tui-travel-plc/hotellinformation/reko-resande/miljoarbete/res-mal-och-hotell/travelife/>

60 Ving's website: <http://www.ving.se/fakta-och-siffror>

61 Ibid: <http://hallbartresande.ving.se/certifieringar/>

62 Ibid: <http://www.ving.se/hitta-hotell>

63 Ibid. <http://hallbartresande.ving.se/certifieringar/>

## 5. The possibilities and limitations of auditing

The positive effects of multinational corporation (MNC) codes of conduct and auditing working conditions at suppliers have been questioned. The former UN Special Representative on Business and Human Rights have pointed out that auditing alone has failed to generate sustained improvements, and emphasized “You don’t fatten a pig by weighing it over and over again.”<sup>64</sup> Some academic researchers regard codes of conduct as PR tools and others argue that it could harm workers’ rights “by crowding out public regulation”.

This is a lesson that MNC’s with a high profile within Corporate Social Responsibility (CSR) have already learned from. In their latest sustainability report, H&M presents their “next generation of supplier assessment” that moves their approach from “yes or no based compliance audits” and put greater focus on partnerships and involvement of local stakeholders. According to H&M, this is because audits are not enough to tackle systemic issues.<sup>65</sup> H&M is also integrating their second-tier suppliers (subcontractors to H&M’s suppliers) into the sustainability assessments and thus acknowledges the fact that many of the worst violations of human rights occurs further down in the supply chain.<sup>66</sup>

But there are also academic researchers presenting evidence that codes of conduct and auditing can in fact improve working conditions under certain circumstances and some research has been done on when and how codes of conduct and auditing can lead to positive effects.<sup>67</sup>

Research based on case studies of 11 companies and their suppliers imply that auditing to some extent improve quantifiable “outcome issues” such as minimum wages, working hours, health and safety and child labour (issues that are easier to audit, in general) but fail to improve “process issues” like discrimination, freedom of association and right to collective bargaining.<sup>68</sup>

Other factors that could influence the effects of codes and auditing are the ownership of the supplier, the characteristics of the buying company and labour regulations in the country where the supplier is located. If the ownership is foreign, this is positively related to compliance with codes of conduct as well as well-known brand names and countries with strong labour regulations.<sup>69</sup>

Corporate driven initiatives (such as Travelife) have been criticized for not bringing enough positive changes but research in the toy sector shows that they could have significant impacts on workers’ rights since they “provide buyers with a unified front vis-à-vis suppliers”. The research also indicate that codes of conduct and audits can improve working conditions over time and that this is more likely to happen when buyers increase their demands and value transparency higher than initial compliance.<sup>70</sup> According to the UN, respected multi-stakeholder or industry initiatives can be a particularly valuable source of advice and experience in addressing business and human rights challenges.<sup>71</sup>

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64 Prof. John Ruggie, Former UN Secretary-General’s Special Representative on Business & Human Rights, keynote speech “From Audit to Innovation”, BSCI Annual Conference November 2014

65 H&M Conscious Actions Sustainability Report 2014, [http://sustainability.hm.com/content/dam/hm/about/documents/en/CSR/reports/Conscious%20Actions%20Sustainability%20Report%202014\\_en.pdf](http://sustainability.hm.com/content/dam/hm/about/documents/en/CSR/reports/Conscious%20Actions%20Sustainability%20Report%202014_en.pdf), p. 34

66 Ibid, p. 36

67 Niklas Egels-Zandén, 2014: Revisiting Supplier Compliance with MNC Codes of Conduct: Recoupling Policy and Practice at Chinese Toy Suppliers, *Journal of Business Ethics*, p. 59

68 Ethical Trading Initiative 2006, The ETI Code of labour practice: Do workers really benefit? <http://www.ethicaltrade.org/sites/default/files/resources/Impact%20assessment%20summary.pdf>, p. 12-14

69 Egels-Zandén, 2014, p. 63.

70 Ibid, p. 71.

71 OHCHR 2011, [http://www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR\\_EN.pdf](http://www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf)

The main difference between corporate driven initiatives and multi-stakeholder initiatives (MSIs) is that MSIs normally engage trade unions and NGOs in a leading position together with corporations from one or more sectors. Some MSIs, like the Ethical Trading Initiative (ETI) in the UK, focus mainly on exchange of experiences and knowledge between their members, and do not offer a verification process for suppliers.<sup>72</sup> Other MSIs offer a verification process, like the Fair Wear Foundation (FWF) in the Netherlands, engaged in the garment sector. FWF has developed a unique verification system that involves local partners in the auditing and grievance processes. FWF's auditors interview workers offsite prior to visiting factories to avoid situations where workers are told by the management what to answer. Auditors also interview trade unions at the workplace or worker representatives when a union is not present and trade union representatives participate when audit outcomes and improvements are discussed.<sup>73</sup>

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72 ETI's website, <http://www.ethicaltrade.org/about-eti/what-we-do>

73 FWF's website, <http://www.fairwear.org/514/about/verification/>



*The information on Apollo's and Fritidsresor's websites about Travelife and certified hotels is outdated, making it hard for consumers to make informed choices about sustainable travel.*

## 6. Field study at hotels in Turkey

### 6.1 The tourism sector in Turkey

The booming Turkish tourism sector reached 31.5 million international visitors in 2013. The direct contribution of the travel and tourism industry to the country's GDP is TL 57.5 billion.<sup>74</sup>

Turkey is the seventh most visited country by Swedes and in 2013, 740,000 Swedes visited the country, an increase by 16 percent compared to the figure from 2012.<sup>75</sup>

For charter tourists, Antalya in Turkey (including Alanya and Side) is the most popular destination. One of the main reasons for the popularity is the low price level of accommodation and food in combination with a high hotel standard.<sup>76</sup> After Greece, Turkey is the most popular summer destination for Apollo travelers.<sup>77</sup> Turkey is one of Fritidsresor's most popular destinations, making up about 15 percent of the company's sales of package tours.<sup>78</sup>

### 6.2 Labour rights in Turkey

Although Turkish labour law is quite good in theory, the workers continue to face many problems especially regarding low wages, long working hours and limited access to freedom of association and collective bargaining. According to the International Trade Union Confederation (ITUC) and their Global Rights Index, Turkey is ranked in the fifth category where there is no guarantee of workers' rights, together with countries such as Saudi Arabia, Colombia and Bangladesh.<sup>79</sup>

Turkey has ratified all of the ILO's core conventions. However, the country faces strong criticism from the ILO and the European Union for not complying with the standards regarding freedom of association and right to collective bargaining. In 2012, a new Trade Unions and Collective Bargaining Act took effect but it does not fully comply with the international standards.<sup>80</sup>

There are approx. 707,000 people working in the hotel sector of the Antalya and the Alanya area. Only 4 percent of the workers are members of a trade union.<sup>81</sup> A trade union should represent at least 1 percent of the workers employed in the industry, to be able to take part in collective bargaining. At the workplace level, a union should represent 50 percent or more of the employees to be able to sign a collective bargaining agreement (CBA). At enterprises with multiple workplaces, 40 percent of the work force needs to be part of a trade union to be covered by a CBA.<sup>82</sup>

There is a general problem of unregistered employment in the Turkish labour market. It is not unusual that employers have double bookkeeping to reduce taxes and social security costs by falsifying the payrolls. Unregistered workers are more vulnerable since they do not have any social security.<sup>83</sup>

The majority of the Turkish people cannot afford basic living needs. Almost half of the population does not have enough money to eat meat or fish every second day and cannot afford unexpected financial expenses. Official data regarding a Turkish living wage is not available, but according to local trade unions, a living wage estimation that could support a family of four people

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74 The Republic of Turkey Prime Ministry Investment Support and Promotion Agency 2013: Travel & Tourism, <http://www.invest.gov.tr/en-US/infocenter/publications/Documents/TOURISM-INDUSTRY.pdf>

75 Expressen 140212, <http://www.expressen.se/res/populara-resmal--hit-reser-svensken-helst/>

76 Svenska Dagbladet 140630, [http://www.svd.se/resor/hit-reser-svenskarna-just-nu\\_3684420.svd?sidan=1](http://www.svd.se/resor/hit-reser-svenskarna-just-nu_3684420.svd?sidan=1)

77 Apollo's website: <http://www.apollo.se/om-apollo/fakta-och-siffror>

78 Fritidsresor's website:

<http://www.fritidsresor.se/om-fritidsresor/om-foretaget/> and <http://www.fritidsresor.se/om-fritidsresor/om-foretaget/vara-resor/>

79 ITUC Global Rights Index 2014, [http://www.ituc-csi.org/IMG/pdf/survey\\_ra\\_2014\\_eng\\_v2.pdf](http://www.ituc-csi.org/IMG/pdf/survey_ra_2014_eng_v2.pdf), p. 38

80 Fair Wear Foundation Turkey Country Study 2015,

<http://www.fairwear.org/ul/cms/fck-uploaded/documents/countrystudies/turkey/TurkeyCountryStudy2015web.pdf>, p. 12

81 Ministry of labour and social security 2014,

[http://www.csgeb.gov.tr/csgebPortal/ShowProperty/WLP%20Repository/csgeb/dosyalar/istatistikler/2014\\_ocak\\_6856](http://www.csgeb.gov.tr/csgebPortal/ShowProperty/WLP%20Repository/csgeb/dosyalar/istatistikler/2014_ocak_6856)

82 Fair Wear Foundation 2015, p. 12-13

83 Ibid, p. 13

is between 3,333 and 4,199 TRY per month.<sup>84</sup> The current monthly minimum net wage of 949 TRY (the gross salary is 1,201.50 TRY<sup>85</sup>) is only about 1/3 of an estimated living wage. Depending of the family size, employees can get a monthly living allowance from the government of 90–135 TRY.

The Turkish labour law states a maximum of 45 working hours a week, a daily maximum of 11 hours and 7,5 hours maximum for night work. Overtime work shall not exceed 270 hours per year and overtime should always be voluntary. Working overtime is not permitted for workers under the age of 18, during pregnancies or for workers with poor health and temporary workers. Overtime should always be recorded and paid for. Employees are entitled to one weekly day of rest. After one year of employment, the employee is entitled to an annual leave of 14–26 days, depending on the number of years of employment.<sup>86</sup>

According to the Labour Act, “no discrimination based on language, race, sex, political opinion, philosophical belief, religion and sex or similar reasons is permissible in the employment relationship.” Pregnant employees should not work for 16 weeks; eight weeks before birth and eight weeks after delivery. Companies with 150 female employees or more should provide childcare facilities, but many companies does not comply with the law in this aspect.<sup>87</sup>

### 6.3 Field study findings

#### 6.3.1 Precarious work and social security

A vast majority of hotel workers in Turkey are seasonal employees. This is also true for the interviewees in this study where 85% of the workers are seasonal employees. For the workers, this alters their economy and social security negatively. Most of them work around 6-8 months at the hotels and the rest of the year they are either unemployed or have temporary work such as domestic worker or helping out family members in smaller businesses.

All 33 interviewees are registered workers, meaning that the employers pay social security fees during their period of employment. In the case of seasonal employment, they get no paid leave or social security during the part of the year when they are not scheduled to work at the hotels. This can have a profound impact on the workers’ social security and their quality of life. One hotel housekeeper from a Travelife certified hotel connected to Apollo was involved in a car accident just prior to the commencement of her seasonal work schedule. Both she and her husband were injured and the car was destroyed. Since they were unemployed and had no access to social security at the time of the accident, they were forced to pay for the hospital and medical bills themselves and did not get any financial support for not being able to work. The couple is now experiencing serious debt and the husband is unable to return to the workplace because of the injuries. The hotel housekeeper says:

*“If we had been registered workers and working at hotel during the time of the accident, the social security system would have paid for us when we cannot work. Because of the accident I was shattered psychologically and financially, I don’t know what to do. I have two kids to support and I work now and try to keep them in school.”*

In theory, the hotel workers should benefit from better social security protection during the period of the year when they work at the hotels. But that is not always true in practice. If a worker becomes sick or has an accident during the period of employment and gets support from the social security system, he or she still face the risk of losing the job at the hotel. It is a general problem in Turkey that employers fire employees during the time they do not attend work. If that happens, the employer has to pay compensation to the worker, but that is a cold consolation for workers that are in need of an employment. Based on the interviews, 85% of the interviewees, working at 8 of 10 hotels, believe that they would be fired if they had an accident and had to stay off work for a longer period. A housekeeper from a Travelife certified hotel connected to Fritidsresor says that:

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84 Ibid, p. 24 and 27

85 Ministry of labour and social security 2014, <http://www.csgeb.gov.tr/csgebPortal/cgm.portal?page=asgari>

86 Fair Wear Foundation 2015, p. 29-30

87 Ibid, p. 17-18

*“I think they would fire me if I become sick and cannot work for a week.”*

A housekeeper from a non-Travelife hotel connected to Ving tells about a colleague that had a work accident where she drank cleaning detergent by mistake because a water bottle was used to contain the chemicals. The colleague felt sick and was taken to the hospital but her manager at the hotel told her not to tell the truth about the accident and to tell the doctors that she had had an accident at home instead of an accident at work. As a result, the case was not registered as a work related accident and she did not get proper compensation from the employer.

Concerning precarious employment and social security, there are almost no differences between workers at Travelife hotels and workers at non-Travelife hotels, according to Schyst resande’s comparison of the findings.

Compared to the situation in 2012, there is an improvement in the number of workers that have a written contract of employment. In the study of 2012, less than half of the workers had a written contract whereas now all of the 33 workers interviewed have a written contract, even though many of them have not read the contract or do not know the content.

### 6.3.2 Wages and working hours

The precarious employment of the seasonal employees within the hotel sector affects the working conditions like wages. Most workers are very happy to simply have gotten a job, so often they do not run the risk of jeopardizing the opportunity by demanding higher wages, better working hours or even asking questions about how their wages are calculated.

This is reflected in the interviews with workers. For example, 6 hotel housekeepers, at a Travelife hotel connected to Ving, were interviewed the same day as their employment started at the hotel for the season. None of the 6 knew what their wage would be, as they had not discussed this with the employer before the employment started. They also reported that this was a common behavior by employers in the sector. Other workers’ testimonies confirm this and also tell about very non-transparent systems of wage calculation that means that the workers do not understand why they get a certain wage figure.

All interviewees that know their wage figure earn at least the legal minimum net wage (LMW) of 949 Turkish lira (TRY)<sup>88</sup> each month. At the Travelife hotels, 45% of the interviewees earn the LMW. The rest of the workers earn slightly more and the highest paid interviewee is a waiter that earns 1,500 TRY<sup>89</sup>. The hotel housekeepers are the lowest paid workers in the study. Even though the wages are equivalent to the LMW or more, many workers do not perceive their wage as a living wage; a wage that cover the workers’ and their families’ basic needs and some space for savings.<sup>90</sup>

At Travelife hotels, 90 percent of the interviewees do not think that their wage is enough to live upon and feed their family. When asked, workers estimate that a living wage should correspond to approx. 3,000 TRY. According to local trade unions, a living wage estimation that could support a family of four people is between 3,333 and 4,199 TRY per month.<sup>91</sup> This is more than three times as much as the current LMW and reveals a big gap between the hotel workers’ wages and a living wage. The wage situation is more or less the same for workers at non-Travelife hotels.

A bartender from a Travelife hotel connected to Apollo says:

*“I and my family survive because my wife and my kids have the opportunity to spend two months during the summer at her parents’ house. All inclusive indeed (laughing).”*

A waiter at a Travelife hotel connected to Fritidsresor:

*“If you are single and stay in the hotel’s dormitories it’s enough. But if you have a family, it is not enough.”*

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88 949 TRY is approx. 324 EUR

89 1500 TRY is approx. 512 EUR

90 For practical guidance on how companies can work to implement a living wage in their supply-chain, see for example Ethical Trading Initiative’s briefing Living Wages in Global Supply Chains: a new agenda for business, <http://www.ethicaltrade.org/resources/living-wages-in-global-supply-chains> or Fair Trade Center’s report From dream to reality, <http://fairtradecenter.se/node/1744>

91 Fair Wear Foundation 2015, p. 24 and 27

In addition to low wages, excessive overtime is common. Just over half of the workers from Travelife hotels work overtime on a regular basis, especially bar and restaurant workers. Cemalettin Kelten, the Mediterranean regional branch president of the local trade union for hotel workers, Toleyis, confirms that the working hours for hotel workers are not within the legal limits:

*“Working 12, 14 or even 16 hours a day is not unusual. Hotel workers at non-unionized hotels work until their boss gives them permission to leave.”<sup>92</sup>*

None of the workers that work overtime get proper overtime compensation according to the law. The lack of overtime payment is a problem at 3 of 5 Travelife hotels that are connected to Apollo, Fritidsresor or Ving. At the non-Travelife hotels, workers have the same problem with no overtime payments.

According to the labour law, workers are entitled to one day off per week. Nevertheless, nearly a third of all interviewees cannot always use their day off because they have to work. Fewer workers at Travelife hotels are denied their days off, comparing to workers at non-Travelife hotels, where nearly half of the interviewees can use their free days every week.

Compared to the situation in 2012, no signs of improvements regarding wages, excessive overtime and overtime payments can be seen. Regarding wages, the situation has worsened according to the interviewees. Even though the LMW is revised annually and is higher now compared to the figure in 2012, a living wage in the perception of the workers now ends up to three times as much as the LMW, whereas in 2012 the workers needed double as much wage to cover their basic needs.

### 6.3.3 Occupational health and safety

A positive trend, compared to the situation in 2012, is that all of the workers in this study have taken part in occupational health and safety (OHS) training to prevent work related accidents and poor health related to the work situation. In the 2012 report, only a third of the workers had participated in such trainings. According to the workers, this is related to an increased number of audits of the hotels conducted by the Ministry of labour and social security. Some of the interviewed hotel housekeepers also verify that they have gotten safety equipment such as gloves and protective masks. However, this positive trend is combined with the testimonies of hotel housekeepers who state that they have no time to use the safety equipment in their daily work. Many of the hotel housekeepers experience such work related stress that they do not use the safety instructions and equipment because it slows down their work too much. A hotel housekeeper from a Travelife hotel connected to Fritidsresor says:

*“This job is really hard because there is a really huge workload on us. My hands are bleeding and the skin is very dry. They gave us training and said that we should wear gloves. But we have to clean too many rooms and work really quick. When we use the gloves, we lose a lot of time, so we don't use them.”*

Almost half of the hotel housekeepers at the Travelife hotels suffers from back pain. The housekeepers are also worried about the danger associated with using cleaning products, what kind of chemicals the cleaning detergent they use might contain, and how this might affect their health. At non-Travelife hotels, the situation is even worse for the housekeepers, and all of the interviewed hotel housekeepers suffer from back pain. A hotel housekeeper from a non-Travelife hotel connected to Ving says:

*“I have serious problems with my back; herniated discs. I have to have surgery. I think it is related with my job, because we have to bend and carry and move very heavy things.”*

The heavy workload and stress impact the housekeepers both physically and psychologically and many of them have no time for breaks during the working day.

### 6.3.4 Discrimination

Of the workers interviewed, there are four Kurdish people in total, working at Travelife hotels and non-Travelife hotel. The workers with Kurdish background have experienced discrimination at

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92 Cemalettin Kelten, Toleyis Mediterranean regional branch president, 150415



other hotels before, because of their ethnicity. None of them think that they are discriminated at the current workplace but they say that many hotels do not want to hire workers that are Kurdish. One worker's husband got fired from a hotel because he was Kurdish (not a hotel included in this report).

Several other workers (Kurdish and non-Kurdish), from 6 out of 10 hotels, also states that many hotels do not want to hire Kurdish workers. Based on the workers' testimonies, discrimination of Kurdish people because of their ethnicity is a structural problem in the sector.

Among the interviewed workers, there is no sign of gender discrimination in terms of wages in situations where both men and women have the same job. But many of the interviewees describe a gender gap at the hotels where male workers normally have positions like managers, bartenders and waiters and almost all hotel housekeepers are females. The less paid workers at the hotels are very often the housekeepers and this is also true for this study. Therefore this can be seen as a structural problem rather than an individual wage problem. A hotel housekeeper at a Travelife hotel connected to Ving says:

*“Cleaning is not valued as much as work undertaken by men. But without us it is not possible to run a hotel. The working conditions here are not very bad. But in general that is a problem.”*

### 6.3.5 Freedom of Association

Another structural problem in the sector are violations of FoA and the right to collective bargaining. FoA and the right to collective bargaining are core labour standards and so called “enabling rights” which means that they give workers the possibility to influence their working conditions and rights at the workplace. Without access to FoA and the right to collective bargaining, it is very hard for employees to express their will and try to improve their working conditions jointly. Issues like wages, working hours, OHS and discrimination can all be improved by workers themselves if they are allowed to become members of trade unions and where the employer respects and bargains with the trade unions. That is, in short, why FoA and the right to collective bargaining are very important, and basic, human rights.

Unfortunately, this study has revealed severe violations of these rights. At 6 out of 10 hotels, workers think that their boss would not approve if they were members of a trade union. At 7 out of 10 hotels, workers think that they could be fired for becoming trade union members. A bartender at a Travelife hotel connected to Fritidsresor says:

*“Who can be a member of the union anyway? It is obvious that when you become union member you can get fired.”*

A bartender at a Travelife hotel connected to Ving says:

*“No one is a union member here. Because when you join a union you are fired.”*

This picture is shared by one of the local trade unions for hotel workers, Toleyis. Their Mediterranean regional branch president, Cemalettin Kelten, confirms that it is very hard to organize workers within the hotel sector. According to him, it is common that employers close down hotels where unionizing attempts are made by the trade union and the workers are often fired. The employers are organized in a business association that allows them to share the costs in such an event. They will share the expenses associated with the closing of the hotel, and distribute the hotel guests to other member hotels that belong to the organisation.<sup>93</sup>

According to our comparative findings, the situation regarding FoA is not any better at Travelife hotels compared to non-Travelife hotels. Some of the workers do not even know what trade unions are or what they do. Only one of the hotels in the report is a unionized workplace with a collective bargaining agreement in place. This is a non-Travelife connected to Apollo. At this hotel, the working conditions are better than at many other hotels, according to the interviewees. The workers interviewed at this hotel are satisfied with their working conditions in general and according to Cemalettin Kelten, the workers get a wage bonus every three months, on top of their monthly wage. One worker at the unionized hotel says that a colleague had a work related accident and it was no problem for him to get proper sick pay and the workers think that they could have a longer period of sickness without running the risk of getting fired.

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93 Cemalettin Kelten, Toleyis Mediterranean regional branch president, interview 150415



*Only one of the hotels in this study is a unionized workplace with a collective bargaining agreement in place. This is a non-Travelife connected to Apollo. At this hotel, the working conditions are better than at many other hotels, according to the interviewees.*

Another remarkable difference between the unionized hotel and the other hotels are the workers' right to freedom of speech. At the hotels without a trade union, many workers were afraid to talk to the researchers. They also worried at what their managers would do if they found out that they had participated in the study. At the unionized hotel, workers were relaxed and did not seem to worry about this and feel free to talk to the researchers without fear. In this sense, it is obvious that FoA can enable workers to gain access to their freedom of expression.

However, this does not mean that the unionized hotel is perfect in every aspect. For example, overtime work is compensated with time off and not in overtime payment. But in total, the working conditions are better compared to other hotels, according to the workers.

The situation regarding FoA at the hotels has not improved since 2012. According to the workers, it has not gotten better. The local trade union Dev-Turizm İş argues that the situation has worsened since they can hardly organize new members at all. According to the union, the employers obstruct their unionizing attempts and warn the workers of trying to become trade union members. It is also common that employers ask questions related to union membership in application forms, to hinder trade union members from advancing in recruitment processes.<sup>94</sup>

### 6.3.6 *Travelife knowledge among workers*

All 20 workers interviewed at Travelife hotels were asked if they had ever heard of Travelife and if so, if they knew what it is. Only one worker had heard of Travelife but he did not know anything about it. The workers were also asked if they had ever participated in a Travelife interview before. Some of the workers mentioned being asked questions by an auditor, however they were unsure of the person's identity. They could not identify whether this person was representing Travelife or the Ministry of Labour and Social Security. A worker from a Travelife hotel connected to Fritidsresor says:

*“Nearly every three months some auditors come here. The management always knows that they are coming. I have never spoken to them, they do not speak to workers. Because managers know that if workers explain their problems it is trouble for them.”*

According to a manager at a Travelife hotel that was interviewed in the research for this report, the auditor that comes to the hotel from Travelife do not speak to any workers and does not even speak the local language. This is not in line with Travelife's statement regarding that staff interviews are a requirement of the Travelife criteria and properties must allow them to take place with no detrimental effect to their employees.<sup>95</sup>

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94 Representatives of Dev-Turizm İş, Antalya, interviews 150415

95 Sören Stöber, survey reply 150413

## 7. Conclusion

Schyst resande believes that collaboration between the different tour operators around a common standard for environmental and social performance, as well as consumer-oriented labels could drive change towards a more sustainable tourism sector. From this perspective, Travelife could be an opportunity for enabling increased respect for the human rights of the workers within the sector.

However, this report uncovers essential weaknesses of the Travelife criteria and the monitoring process of the accommodations regarding human and labour rights. The criteria lack references to international labour rights standards, such as the ILO core conventions, and do not cover freedom of association and the right to collective bargaining. A lack of responsibility for human and labour rights at subcontractors and for contract workers/agency staff of the hotels is also revealed. The environmental criteria and monitoring process of this part of the standard has not been evaluated in this study.

According to Schyst resande's interviews with hotel workers in Turkey, violations of the Travelife criteria are to be found at the hotels. Furthermore, the local labour law as well as international human and labour rights are being broken. The most severe violations are related to breaches of freedom of association, poor wages and a lack of occupational health and safety. Workers are afraid to join a trade union, they cannot survive on their incomes and are often suffering from work related injuries and stress. In addition, they are very vulnerable and have little access to social security because of the seasonal employment. Finally, they do not get properly compensated for overtime work.

Clear violations of the Travelife standard have been found regarding labour and human rights related to five criteria: the workers do not know or understand the terms or conditions of their employment including remuneration (criteria 03.01), the accommodations do not pay employees a living wage (criteria 03.03), overtime is not paid (criteria 03.05), effective grievance procedures are not in place (criteria 03.10) and the accommodations do not provide employees with appropriate training regarding the rights to fair working conditions and benefits (criteria 03.12).

There are indications of possible breaches of the standard that needs to be investigated further by Travelife, concerning if working hours comply with the national law (criteria 03.04) and if people are discriminated against in terms of recruitment etc. because of ethnicity such as a Kurdish background (criteria 03.09).

When comparing Travelife certified hotels with non-Travelife certified hotels in the study, there are almost no differences concerning respect for labour and human rights. Slightly fewer hotel housekeepers have problems regarding OHS at Travelife hotels, but still half of the hotels housekeepers suffers from back pain which is still very problematic and not in line with international labour rights regarding health and safety.

At the unionized hotel in the study, the working conditions are better than at other hotels (both Travelife and non-Travelife hotels), according to the workers. Compared to workers at non-unionized hotels, they are not afraid of talking to the researchers and express their thoughts. This confirms the findings of 2012, where unionized hotels also stood out positively in terms of working conditions.

No substantial improvements regarding working conditions in the hotel sector in Alanya 2015 can be seen, compared to the situation in 2012. There are indications of improvements regarding the proportion of workers that has signed a contract of employment and an increase in the number of inspections by the Ministry of Labour and Social Security, compared with 2012. It is discouraging to note that workers still face precarious work, severe violations of FoA, poor wages and a lack of safe and healthy workplaces.

The standard search function on Apollo's, Fritidsresor's and Ving's websites does not include a filter for finding hotels with sustainability certification. Apollo and Fritidsresor offer information that is not up to date about Travelife and certified hotels even though the new standard has been in place for over 1.5 year. This makes it hard for consumers to make informed decisions about sustainable travel.

## 8. Recommendations to Travelife and Apollo, Fritidsresor and Ving

According to the UN Guiding Principles on Business and Human Rights, the corporate responsibility to respect human rights requires companies to identify, address and mitigate human rights impacts with which they may be involved through their business relationships.<sup>96</sup> Working with business partners, industry driven initiatives or multi-stakeholder initiatives can help enterprises to respect human and labour rights. But Apollo, Fritidsresor and Ving have the overall responsibility for the working conditions in their supply chain and cannot “outsource” the duty respect human and labour rights in their supply chain to Travelife or the accommodations. In addition, the tour operators are the ones selling package holidays and should be held accountable for their sustainability performance to their consumers and other stakeholders.

### Recommendations to Travelife

*Regarding the Travelife criteria:*

- **Add Freedom of association and the right to collective bargaining to the standard** and include references to specific international standards concerning human and labour rights (especially the missing ILO core conventions: 87, 98, 29, 105, 100, 111).
- **Improve the criteria regarding health and safety** to prevent accidents and minimize health risks, in accordance with ILO Convention 155.
- **Clarify the wording of the standard regarding living wage.** Wages and benefits paid for a standard working week shall meet at least legal or industry minimum standards and always be sufficient to meet basic needs of workers and their families and to provide some discretionary income (ILO Conventions 26 and 131).
- **Incorporate responsibility for human and labour right at subcontractors and for contract workers/agency staff** of the hotels into the Travelife standard. Travelife should also put more effort into reviewing the supply chain of the hotels including human and labour rights risk analyses.
- **Transparent reporting** on the progress of the issues covered by the standard should be presented annually.

### Regarding improving the monitoring and audit process of the standard:

- **Improve the quality of the audits** in order to avoid certifying hotels that do not comply with the Travelife criteria.
- **Go beyond pass/fail compliance** and involve workers and local stakeholders including trade unions in the process of monitoring accommodations and improvement programs. Establish cooperation with the global union for farm, food and hotel workers (IUF) for support within labour rights.
- **An easy and safely accessible complaints mechanism** should be available for hotel workers. According to the UN Guiding Principles on Business and Human Rights, industry initiatives should ensure that effective grievance mechanisms are available that are legitimate, accessible, predictable, equitable, transparent and rights-compatible.<sup>97</sup> If the accommodations do not have enough capacity, Travelife could set up a common grievance mechanism for workers at certified hotels.
- **Seek support from Apollo, Fritidsresor and Ving.** Include responsibility of the tour operators

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<sup>96</sup> OHCHR 2011, Guiding Principles on Business and Human Rights, Implementing the United Nations “Protect, Respect and Remedy” Framework, Principle 13, [http://www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR\\_EN.pdf](http://www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf)

<sup>97</sup> Ibid, Principle 30 and 31, [http://www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR\\_EN.pdf](http://www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf)

(including but not limited to Apollo, Fritidsresor and Ving) within the standard regarding especially sustainable purchasing practices and capacity building of accommodations in improvement measures. This should also include a commitment to share identified violations of the standard with the tour operators.

- **Share experiences with and learn from multi-stakeholder initiatives**, such as the Fair Wear Foundation in the Netherlands and the Ethical Trading Initiative in the UK. They have developed best practice methods and resources for auditing, complaint mechanisms, living wage and freedom of association.

### **Recommendations to Apollo (Kuoni), Fritidsresor (TUI) and Ving (Thomas Cook)**

*Regarding the violations of labour and human rights at hotels in Turkey:*

- **Urgently make sure that all accommodations in their supply chain**, Travelife certified or not, comply with national labour law, as a minimum.
- **Conduct risk analysis of where the most acute violations of human rights** at the hotels occur. Based on this report, specific priority should be given to wages, freedom of association, occupational health and safety and vulnerable groups of workers, such as hotel housekeepers, in the hotel sector in Turkey.
- **Support the accommodations in capacity building** and improvement measures to respect human and labour rights and local labour law.
- **A proactive strategy regarding freedom of association is needed.** This should include a dialogue with the global union for farm, food and hotel workers (IUF) but also hotel workers' trade unions on a national and local level.
- **Set up strategies to pay higher wages** for workers at the accommodations with a time-bound goal for reaching a living wage.
- **Demand accurate information from Travelife** regarding violations of human and labour rights at the hotels.
- **Reward hotels with a better social performance with commercial incentives** such as price premiums, volume increases and extended contract duration. Choose accommodations that already have collective bargaining agreements in place.
- **Support consumers in making more sustainable travel choices.** Make sure that the information at the company website is correct and up to date, and that Travelife certified hotels are easier to find and book, along with hotels certified by eco-labels.

# Appendix 1: Questions to Travelife

## General questions about the Travelife standard

1. According to the Travelife website, the standard “is based on leading international sustainability and CSR standards and guidelines”. Could you please enclose the detailed standard? We are not able to find it on the website.
2. On what international conventions does the standard rest?
3. How many accommodations in total are certified by the new Travelife standard?
4. How many accommodations are certified by the Golden Award?
5. How many accommodations are certified by the Golden Award of Excellence?
6. What are the main differences between the Golden Award and the Golden Award of Excellence?
7. In which countries are the certified accommodations located and how are they distributed in percentage?
8. How many guests are staying at Travelife certified accommodations per year?
9. What are the most common breaches against the Travelife standard at the accommodations? If possible, please comment on regional patterns of violations.
10. What is the process if you find breaches against the Travelife standard at an accommodation/at a sub-contractor to the accommodation?
11. What are the most difficult breaches to address?
12. What responsibility for improvement measures lies upon: a) the accommodation b) the tour operators contracting the accommodation and c) Travelife?
13. In which areas have you noted the most significant improvements in terms of social performance (human and labour rights) of accommodations over the last three years?
14. What would you say are the key factors for achieving improvements of social performance (human and labour rights) at accommodations through the Travelife certification? (Eg. capacity building, commitment from management, cooperation with stakeholders).

## About the Travelife Gold checklists

15. Could you please enclose the latest versions of the Travelife Gold checklist, both for medium to large accommodations and small accommodations?
16. Why are there different versions of the checklist for medium to large accommodations and small accommodations?
17. What are the main differences between the checklist for medium to large accommodations and the checklist for small accommodations?

## Communication of sustainability work

18. Do you do an annual report where the result of the Travelife standard and the audits are included?
19. If yes, question 18, since what year?
20. If yes, question 18, is the report publicly available? (Please enclose the latest one and a web link).
21. Do you publish a list of all Travelife certified accommodations? (Please enclose the list and a web link).
22. How do you raise awareness about Travelife certified accommodations among consumers?

## Ability to influence the travel industry

23. Has Travelife taken any measures to meet the following challenges in the travel industry? Please justify why/why not measures have been taken and the choice of method:
  - A. Large variations of guests in high season compared to low season that leads to precarious employments at the accommodations.

- B. Difficulties for employees to join trade unions and violations of the freedom of association.
  - C. Employees lack access to a safe complaint mechanism.
  - D. The legal minimum wage in destination countries (low income countries) seldom constitute a salary that covers workers' basic needs.
  - E. In many countries, migrant workers are particularly vulnerable at the labour market and in the tourism sector and face violations of human rights.
24. How do you think the demand from guests for Travelife certified accommodations has changed in the last five years? (Increased, decreased or unchanged).
  25. Do you cooperate with stakeholders such as relevant trade unions (at global, national and local level) and NGOs to try improve working conditions at the accommodations and prevent violations of human and labour rights?
  26. If yes, question 25: Which trade unions and/or NGOs? How do you cooperate?

### **Questions about the auditing process**

1. How far down the supply chain do you conduct audits?
2. Do you audit the sub-contractors of the accommodations?
3. Are the audits done by internal or external auditors, and how are the two methods distributed in percentage?
4. Are the audits both unannounced and announced and how are these two methods distributed in percentage?
5. How many of the accommodations are audited each year and how often is each accommodation audited?
6. Do you conduct interviews with workers during audits and if so, how and where do you conduct these interviews?
7. How many employees are interviewed during the audit? How many from high level staff, how many from low level staff?
8. How do you secure the safety and anonymity of the employees interviewed?
9. Do you report back the result of the audit to the employees?
10. If there is a trade union represented at the accommodation, do you interview representatives from the trade union?
11. If there is not a trade union represented at the accommodation, do you interview relevant local free and democratic trade unions and/or relevant local NGOs in the nearby area?
12. What does the training of auditors contain in terms of human and labour rights issues and local labour law?
13. What qualifications do the auditors need to have in regard to human and labour rights?



## Appendix 2: Questions to hotel workers

	<b>BACKGROUND</b>	
<b>1</b>	What is your name? What is your age? Where in Turkey do you come from? Which ethnic group do you belong to? Gender?	
	<b>CURRENT JOB</b>	
<b>2</b>	Which hotel do you work for? Are you registered?	
<b>3</b>	For how long have you worked for this hotel?	
	<b>WORKING HOURS</b>	
<b>4</b>	What are your working hours? Do you work overtime?	
<b>5</b>	How many breaks per day do you have?	
<b>6</b>	How long are these breaks?	
<b>7</b>	Do you have a day off? (How many days off did you have in the last month?)	
<b>8</b>	When is the last time you had a day off?	
<b>9</b>	Does the staff get paid for working over time/extra long days?	
<b>10</b>	If you can't work overtime (take care of sick child for example), can you say no?	
<b>11</b>	Do you do the same work the whole day?	
<b>12</b>	Do you get (paid) holiday time? How many days?	
<b>13</b>	Are you ever able to take holiday?	

14	Or do you have to work extra time or another job to make a living?	
	<b>CURRENT JOB</b>	
15	What are your main duties at the hotel?	
16	Do you have any other duties?	
17	How did you get the job?	
18	Are you employed on a seasonal, apprentice or permanent basis?	
19	Have you signed a contract with your employer?	
20	In what language was the contract written?	
21	What did the contract say? Did you understand the contract? Do you understand the language the contract was written in?	
22	What do you like with your job? What do you not like?	
23	Has your boss ever treated you in a bad way (discrimination)?	
24	Who is your employer?	
25	How many workers are employed by the hotel? (Estimation of total numbers of workers).	
	<b>SOCIAL SECURITY</b>	
26	If you have a fever for a week and cannot work, will you have any salary?	
27	If you will have a bad accident at work, will your employer pay you any money as economic compensation if you can't work for a long time?	
28	Does a woman use their maternity leaves and breast feeding leaves? How much and for how long?	

	<b>WAGE/SALARY</b>	
<b>29</b>	What is your wage/salary (total per month)?	
<b>30</b>	Are you paid per hour/day/week or month?	
<b>31</b>	When do you get paid (at the end of the day/week/month)? Do you get paid on time?	
<b>32</b>	Is this salary enough to live out off/ "feed your family" (living wage), or is a second job necessary to make a living?	
<b>33</b>	How much would you need to cover the basic expenses?	
<b>34</b>	If applicable: How much does your Kurdish/Russian/Moldavian colleagues earn for the same job?	
<b>35</b>	How common is it for workers to have their wage withheld by the management as a means of punishment?	
<b>36</b>	Has it happened to you?	
<b>37</b>	Why did it happen (what's the story behind the incident)?	
<b>38</b>	Do men and women earn the same wage for similar kind of work at the hotel where you work (eg. are the two sexes equally paid)?	
<b>39</b>	Do you get meals/transport from the employer (any other benefits)?	
	<b>LIVING CONDITIONS</b>	
<b>40</b>	Where do you live?	
<b>41</b>	Do you commute everyday or live in/ close to the hotel on working days	
<b>42</b>	If applicable: How many people do you live with (in the camp)?	
<b>43</b>	What are your living conditions? Concerning:	
	Clean water	

	Sanitation facilities	
	Electricity	
	Sleeping	
	Cooking	
44	Approx total area of living (m <sup>2</sup> )	
45	Are they the same for everyone? (i.e., families / single)	
	<b>BACKGROUND</b>	
46	Do you have a family	
47	Where do they live?	
48	Do your children go to school? If not, why? What do they do?	
49	Do you send them money?	
50	Could they get by without you sending them money?	
	<b>ETHNIC GROUPS</b>	
51	What other ethnic groups are there within your work force (for example Kurds, Russians, Moldavians, Ukrainians etc)? How many workers of each group in the workforce?	
52	Are other ethnic groups treated differently than the Turkish workers? (discrimination?)	
	<b>WORKING ENVIRONMENT</b>	
53	Is there any danger in your job? What?	
54	Have you ever had a work accident? Or have you ever seen others get injured? How and when? What happened after that?	
55	What measures have the hotel management taken to minimize these risks?	
56	Have the management organized trainings on health and safety?	

	<b>CHILDRENS SITUATION AND FORCED LABOUR</b>	
<b>57</b>	How old is the youngest person working here?	
<b>58</b>	For how long time has he/she worked her?	
<b>59</b>	What are his/her duties (can we talk to him/her later on)?	
<b>60</b>	Salary?	
<b>61</b>	Working hours?	
<b>62</b>	Days per week?	
<b>63</b>	Where does he/she lives? With the family?	
	<b>FORCED LABOUR</b>	
<b>64</b>	Do you have any information on forced labour (no salary) being used inside the hotel?	
	<b>UNION/LABOUR ORGANIZATION</b>	
<b>65</b>	If something is wrong at the place where you live or where you work, can you ask the boss/manager if he can help you to fix that?	
<b>66</b>	What is the boss' attitude towards you and the other employees? Have you ever heard about a trade union?	
<b>67</b>	Are you, or have you been, a member of a trade union? Which one?	
<b>68</b>	Have you got any help from a trade union? Which one, and with what?	
<b>69</b>	If applicable: What is the boss' attitude towards the trade union?	
<b>70</b>	Do you ever heard about any organizing attempt in your place in the past? What happened?	

71	If applicable: Are trade union members at your work place treated differently than the rest of the employees? How?	
72	If applicable: How many of the workers at the hotel are trade union members? (Estimate in percentage if possible).	
73	Do you feel free to join a trade union of your own choice? If not, why?	
	<b>TRAVELIFE</b>	
74	If applicable: Did you know that this hotel is certified by the Travelife standard?	
75	Do you know what the Travelife standard is? Has your employer ever given you any information about this?	
76	Have you ever been interviewed by a Travelife auditor? If yes, please give more details. Have you heard of anyone else in the staff being interviewed?	
	<b>END</b>	
77	If applicable: How is your working conditions at this hotel compared to the situation in 2012? Has the working conditions changed for the better/ worse or are they the same? What has changed?	
78	Any other comments regarding your job conditions?	
79	Have you heard of a similar work place where the working conditions are much better for the workers than here? (A “good example” concerning working hours, wage, safety, and labour organizing.) Which one?	
	<b>ADDITIONAL QUESTIONS TO MIGRANT WORKERS</b>	
80	How long have you worked in this job? (How long have you worked as a cleaner/gardener/etc. in Turkey?)	
81	How long time have you been in turkey, and how long have you worked?	
82	How did you get to Turkey? Describe the trip to Turkey?	

<b>83</b>	Do you have a work permit?	
<b>84</b>	Who arranged it?	
<b>85</b>	How much did you pay?	
<b>86</b>	Who did you pay to?	

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