

Promoting Occupational Safety and Health for Cambodian Entertainment Sector Workers

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Abstract

Cambodia has developed booming textile, garment, tourism, and entertainment service industries since the mid-1990s. The 2007 global financial crisis pushed many garment workers, who lost their jobs, into the entertainment sector. Entertainment workers are typically engaged informally by their employers and are subjected to long working hours, sexual harassment, and violence. Many who sell beverages are forced into excessive alcohol consumption as part of their work. Many are also expected by their employers and clients to provide sexual services. To address unsafe and unhealthy working conditions for these workers, an innovative occupational safety and health regulation was adopted in 2014. This first-of-its-kind occupational safety and health regulation was developed jointly by the Cambodian Ministry of Labour and Vocational Training and employers' and workers' organizations in the entertainment sector. The implementation of this regulation can also be a viable contribution of occupational safety and health to HIV interventions for these workers.

Keywords

entertainment sector workers, legal reform, occupational safety and health, sexual assault, violence

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Introduction

The Kingdom of Cambodia (hereafter called Cambodia), is located in the Southern Indochina Peninsula of Southeast Asia. The country is bordered by Thailand, the Lao People's Democratic Republic, Vietnam, and the Gulf of Thailand. As of 2014, its population was more than fifteen million.¹ The World Bank classified the country as low income. However, its gross domestic product has been stable at a rate of around 7% since 2010.¹ Textile, garments, and tourism have been strong growth sectors of the country's economy, particularly during the period of mid-1990s until 2007 just prior to the global financial crisis.² Accompanying tourism is a booming entertainment service industry.

According to the government of Cambodia, the entertainment service industry includes "enterprises, establishments and companies producing, wholesale or retail, all types of beverages," and services such as "hotels, restaurants, guest houses, karaoke parlors, discotheques, beer gardens, casinos, massage parlors, cultural or eco-tourism recreation centers."³ This industry is today one of the largest industries in Cambodia.

Entertainment workers, as defined by the Cambodian Ministry of Labour and Vocational Training, is "a worker, who enters into a written or oral contract with an employer or the employer's representative of the entertainment service *entity*,"³ such as an establishment, an enterprise, or a company. In Cambodia, these sector workers also include those engaged by the producers and sellers of beverages, such as hostesses, singers, waitresses, bartenders, and others. This category of workers, however, also includes workers who exchange sex for money.³

This officially accepted term in Cambodia was coined partly in order to develop HIV programs for sex workers, given that the sex trade is illegal in the country. The term has enabled the health ministry, as well as a range of international and national civil society organizations, to conduct on-site HIV prevention, care, support, and treatment services mostly for those who engaged in commercial sex prior to 2007.

The Socioeconomic Context of Occupational Safety and Health Risks Faced by Entertainment Workers in Cambodia

At least thirty-four thousand female entertainment workers are estimated to be active in Cambodia since 2009,⁴ an increase from approximately seventeen thousand such workers reported in 2007.⁵ This number was projected to reach almost forty thousand by 2014.⁶ However, there is no reliable data on the actual size of this workforce due to the informal nature of the workplace in this sector.

The significance of the entertainment industry, as a base for sex work, increased in Cambodia with the passage of the Law on Suppression of Human Trafficking and Sexual Exploitation in December 2007.⁷ This law led

to the closure of brothels and other venues where sexual services were directly provided.⁸ This change resulted in the rapid growth of entertainment establishments where sex is indirectly sold, along with other products and services such as massage, karaoke, hair dressing, and alcohol at bars.

Prior to this 2007 anti-trafficking law, the garment industry, another high-growth economic sector in Cambodia, was attracting a growing number of workers to meet the production lines of its international orders. Most of the garment factory workers were young women; many were from poor rural areas. They were drawn to these factories located in or around major cities.⁹ As the Cambodian economy was negatively impacted by the 2007 global financial crisis as a result of fallen demand from overseas markets, there was lower foreign direct investment from countries affected directly by the global financial crisis, and there was a reduction in the number of tourists. The garment sector, being highly dependent on trade, foreign direct investments, and overseas development assistance, faced drastic downsizing as a result of decreasing global demand. By 2009, an estimated ninety factories were closed resulting in approximately fifty thousand jobs lost.¹⁰ Most women who previously worked in garment factories did not go back to rural homes. Although some garment factory young workers have engaged in sex work on the side previously, with the 2007 anti-trafficking law and closure of brothels amid the closures of factories, a large number of these women moved from the garment industry into the entertainment sector.¹¹ Table 1 indicates an 88% to nearly 400% increase in the size of entertainment service industry workers with a nearly 68% corresponding downturn in the number of brothel-based workers.^{12–14}

The average age of entertainment workers in Cambodia was twenty-five and mostly female.⁸ Most female entertainment workers captured in research began their sexual activities between the ages of 14–19, while among male entertainment workers, this was at the age of 15. Transgender entertainment workers began at around seventeen to nineteen years of age.^{4,15} However, accurate data to determine the exact proportion of gender distribution among these entertainment workers was lacking.

Occupational Safety and Health Risks of Entertainment Workers

The International Labour Organization (ILO) study further found that with the growth of the entertainment service industry, a range of new occupational safety and health (OSH)-related vulnerabilities emerged among these workers. The foremost concerns reported by women working in the entertainment sector were sexual violence, assaults, and harassment by customers, managers, police, and people in the community surrounding the entertainment worksites. In addition to their customers, these workers reported regularly encountering harassment in the form of unwanted touching, groping, and verbal abuse.^{12,16}

Table 1. Changes in locations where entertainment workers sold sex from 2008 to 2009.

Venues	KHANA (2008)	NCHADS (2009)	Percentage change
Karaoke bars	2699	5063	88
Massage parlors	494	2424	391
Beer gardens	1489	6659	347
Beer promotion	1326	6045	356
Freelance	337	799	137
Brothels	765	248	-68

Source: ILO, Cambodia—Addressing HIV vulnerability of indirect sex workers during the financial crisis: situation analysis, strategies and entry points for HIV/AIDS workplace education.

One of the other major health concerns reported by women workers who participated in the study, particularly those working as hostesses in nightclubs, was the requirement that they consume alcohol themselves as a means of enticing customers to purchase more drinks. Many of these women experienced serious health problems as a result of this regular, excessive drinking which their employers (which include beverage industries) called for in order to increase their revenues.¹²

Sexually transmitted infections and HIV also constituted a significant risk due to sexual transmission from customers, especially from long-term customers or from regular sexual partners, with whom condoms were often not used. The HIV prevalence among entertainment workers who also engage in sex work varied between 9% and 15%.¹⁷ The unwanted pregnancy rate was high among female entertainment workers with 46% having at least one induced abortion and 40% with two or more induced abortions.¹⁸⁻²⁰ The entertainment industry's structure presented challenges for reaching entertainment workers to deliver health programs and other support services. In addition to the highly dispersed locations of the workplaces in this sector, most entertainment workers do not disclose their additional sex work especially since the 2007 anti-trafficking law, for fear of being arrested.⁸ In addition, the managers of entertainment venues, unlike the brothels, mostly do not welcome nongovernmental organization staff to access their workers at workplaces due to business reputation and legality concerns. Furthermore, most sexual transactions between these workers and their clients were taking place outside of the actual entertainment venues. Access to these workers, consequently, is mostly dependent on managers and others.^{12,21}

The ILO's assessment in 2009 of OSH and working conditions of entertainment workers found other specific OSH challenges faced by workers in this sector. These challenges included excessively long working hours: on average, most women in the entertainment sector work over ten hours a day, seven days a week without any days off. Another challenge was the lack of paid sick leave. On

the contrary, when a worker was required to take time off for child care or to visit medical doctors, he or she would be fined or financially penalized for being absent from work.¹²

Such negative financial repercussions imposed by employers on these workers contravened the country's OSH policy. For example, the Cambodian Labour Law specifies that "in all establishments of any nature... , the number of hours worked by workers of either sex cannot exceed eight hours per day, or 48 hours per week."²² It further specifies that "the extension of the daily working hours cannot exceed one hour and that hours of work cannot exceed ten hours per day."²² The same law also "prohibited [the employer] from using the same worker for more than six days per week,"²² and that establishments, such as "hotels, restaurants and bars,"²² are to give weekly time off for their workers, by rotating the day off. Furthermore, the labor law indicated that "the workers are entitled to paid leave each year,...(including) weekly time off,...-sick leave,..., special leave granted up to a maximum of seven days during any event directly affecting the worker's immediate family."²²

Creating an Enabling Working Environment

The gaps identified in OSH protections and the lack of decent working conditions for Cambodian entertainment sector workers, despite being a growing segment of the Cambodian workforce, was of concern to the ILO and the Cambodian Ministry of Labour and Vocational Training. As many entertainment workers were in small establishments scattered around the country, such workers were in a vulnerable position in attempting to negotiate decent working conditions through representatives or directly with their employers. At the same time, these workers, such as women working in beer gardens, were the main source of the lucrative revenues generated for their employers, the beer sellers.

The Cambodian Food Service Workers Federation (CFSWF) is a trade union established in December 2007 and registered with the Ministry of Labour and Vocational Training. It is a member of the Cambodian Labour Confederation, one of the largest Cambodian labor union confederations with a membership of more than 60,000.²³ With the facilitation of the ILO, based on findings of the ILO study, the CFSWF developed workplace programs and began working with the beer promotion workers, on protecting their rights and improving their work conditions with the beer companies. CFSWF has accepted many women entertainment workers in restaurants, pubs, karaoke clubs, and other entertainment venues as members. CFSWF empowered them by organizing them into workers unions and encouraged them to participate in social work and promoted them to be women union leaders. CFSWF trained them on issues relating to gender, sexual harassment, workplace violence, OSH, and workers' rights, and provided them with legal assistance when they faced sexual harassment or violations of workers' rights at work.²⁴

This marked a significant step for entertainment workers. Membership with the Food and Service Workers Federation enabled entertainment workers to negotiate a labor agreement to protect their OSH rights in accordance with the country's labor laws. Once entertainment workers found a collective voice, through trade union membership, they were in a position to get the attention of entertainment-sector employers. This led to a process of negotiation and an agreement that a national policy on work conditions and OSH for workers in the entertainment sector was needed.

The employers' and workers' organizations involved, including the Women's Network for Unity, Smart Girls, and the National Entertainment Workers' Network, reviewed the findings from the ILO situation assessment and identified issues for policy development. They then formed the basis for initiating a dialogue with the Ministry of Labour. Through the collective demand from the trade unions, the Ministry, with technical support from the ILO, began the process of considering and discussing the possibility of developing a ministerial regulation to protect these workers' rights.

A thorough legal review on relevant labor laws and regulations was carried out to ascertain the legal basis for developing such a policy. A policy was then drafted and circulated to the concerned Ministries, workers', and employers' organizations for review and comments. The team under the Secretary of State and the Tripartite Coordinating Committee (TCC)/Ministerial AIDS Committee and the Department of Safety and Health of the Ministry shepherded the draft regulations throughout many discussions and meetings engaging all stakeholders.

A final revised version, based on tripartite consultations^a with the Ministry, the workers and the employers' representatives, was then submitted for formal endorsement by the Minister.

The Minister of Labour supported the proposed regulation and signed it into law as "Ministerial Regulation on Working Conditions, Occupational Safety and Health Rules of Entertainment Service Enterprises, Establishment and Companies" on 20 August 2014.²⁵

The Significance of the Regulation

The regulation was jointly launched by the Ministries of Labour and the Ministry of Tourism on 7 October 2014. A joint statement by both Ministries at the launch stated that "The regulation aims to improve working conditions, occupational safety and health rules of entertainment service enterprises, establishments and companies." The statement further stated that "In addition, the regulation also calls for the elimination of forced labor and related violations in the industry, including penalties and wage reductions and mandatory abortions."²⁶

The Minister of Labour indicated at the launch ceremony that the regulation “was part of a national effort to create a supportive environment, where HIV prevention, care and treatment could be strengthened, and where occupational safety, health and working conditions were addressed.”²⁶ The minister further stated that, “This edict will ensure the protection of entertainment workers, who have operated outside the formal economy.”²⁶ The entertainment workers after becoming part of the workers unions, would also be covered by the Cambodian labor regulation on implementation of work place HIV programs.²⁷

In turn, the leader of the National Entertainment Workers’ Network observed that the government, through the launching of this regulation, “has finally recognized that entertainment workers are actually workers, like all others, and should be protected under labor law.”²⁶

This regulation is the first example of a labor regulation aimed specifically at protecting workers in the entertainment sector from occupational illness and accidents, placing an affirmative obligation upon employers in the industry to take measures to ensure a safe and healthy workplace for all of their workers. The following are some specific elements of this regulation.

The regulation enforces the national legislation governing work conditions—including limits on work hours—OSH measures, and other labor protections. In particular, employers’ obligations to those entertainment sector workers “sent to sell or promote all types of beverages” was stressed.²⁵ The regulation specifies that entertainment sector workers are entitled to the same rights and benefits as all other workers under the labor law.²⁵

In particular, maximum work hours for entertainment sector workers: an eight-hour work day and a maximum forty-eight-hour work week were established.²⁵ Fair labor conditions, such as overtime pay, prohibitions against wage deductions, and protection from unfair dismissal are set out in these regulations.²⁵ The regulation explicitly addressed the specific risks faced by entertainment sector workers, particularly those required to promote the sale of beverages, and those who provide sexual services.²⁵ The risks addressed by the regulation include protections against forced or compulsory labor, including forcing “entertainment workers to work overtime, drink alcohol, use drugs or undergo abortions.”²⁵ This provision is in accordance with the ILO’s Forced Labor Convention, 1930 (No. 29), which calls for the suppression of all forms of forced or compulsory labor.²⁸

When entertainment workers are required to drink with clients of the establishments where they work, to promote sales of alcoholic beverages, and are required or encouraged to sell sex to “keep clients happy,” they often face increased risk of sexual assault and violence. These factors in turn lead to an increased risk of HIV transmission. The regulation thus provided protection against violence at work in that “no individual can commit violence or sexual assault on entertainment workers.”²⁵ This is also consistent with the ILO

Recommendation concerning HIV and AIDS and the world of Work, 2010 (No. 200), which provides that “measures should be taken in or through the workplace to reduce the transmission of HIV and alleviate its impact by... (c) ensuring actions to prevent and prohibit violence and harassment in the work place.”²⁹ In this regard, it should also be noted that gender-based violence, which includes harassment and abuse, has been interpreted by the ILO supervisory bodies to constitute a form of sex discrimination, which is a prohibited ground of discrimination under the ILO’s Discrimination (Employment and Occupation) Convention, 1958 (No. 111).³⁰

Implementation and Conclusions

This landmark labor regulation gave equal rights and protection to entertainment workers as with workers in other labor sectors.⁶ The President of the Cambodian Food and Service Workers Federation indicated that “the Ministry of Labour should actively monitor the implementation of the regulations in order to ensure a positive result.”²⁶ He further stated that it would require “strong efforts from all stakeholders, especially employers and trade unions, to effectively implement the regulation.”²⁶ The General Manager of the Cambodian Federation of Employers and Business Association, at the time of the official launch of the regulation, expressed his support and stated that “the employers’ association is ready to implement this edict effectively to make better health and labor conditions for the workers in this informal sector.”²⁶ Noting that entertainment workers are among the most vulnerable populations for HIV in Cambodia, the Vice Chair of the National AIDS Authority indicated that “this effort will strengthen the enabling environment for them to benefit from improved access to HIV programs and services.”²⁶

The Minister of Labour and Vocational Training indicated that initially, the government will encourage voluntary compliance with the regulation on the part of “all the people, especially the entertainment establishment owners.” However, if there is persistent failure to comply, then penalties will be imposed in accordance with the regulation.⁶

An action plan to train key stakeholders on the regulation and on ways to deal with challenges faced by the sector in its implementation has been developed by the Ministry of Labour and Vocational Training. The Ministry, with the external support of the ILO and funding from the ILO and the Global Fund to fight AIDS, TB, and malaria, began disseminating this regulation nationally since the beginning of 2015 to inform and familiarize the industry, its customers, and labor inspectors. Meanwhile, the minister has made provisions to allocate from his own budget, although limited, to facilitate monitoring and implementation. In addition, a regulation implementation guideline has been developed jointly with the Ministry, the employers, and workers trade unions. By the end of 2015, all labor inspectors had been trained to apply this regulation when they

conduct inspections of entertainment worksites. Training has also been conducted with nongovernmental organizations working with entertainment workers, managers of entertainment venues, trade unions, and entertainment workers to enable them to know the workers' rights. A channel for complaints of violations has also been established.

Trained labor inspectors were expected to provide regular reporting to the Ministry on the implementation of these regulations to ensure it has been actively pursued. The TCC is represented by the Ministry responsible for the labor inspectors, the employers responsible for the sector management, and trade unions representing the sector workers. It has been instrumental in the creation and adoption of these regulations. The TCC has now been charged by the Ministry to monitor progress in their implementation. The TCC will also, through its monitoring, recommend enterprises that implement well their workplace HIV and OSH program for recognition by the Ministry of Labour and Vocational Training with a certificate at an annual award ceremony.

Conclusions

As expressed by the Regional Director for Asia and the Pacific of the ILO, "Cambodia's effort to protect entertainment workers is "ground breaking," as it dares to reach into a sector where most governments fail to provide adequate protection.³¹ Entertainment workers in Cambodia, as well as elsewhere in Asia and the Pacific region, face similar labor-related violations which are in violation of workers' rights under the International Labour Conventions. These Conventions apply to all workers, including those in informal settings.

Cambodia, in adopting this OSH regulation, has demonstrated an innovative approach and leadership from the labor sector, to protect the OSH of entertainment workers. This is a transformative approach to HIV prevention while strengthening labor rights and OSH among these workers. While the regulations were unique to the Cambodian context, they nevertheless offer a good practice example in ensuring OSH protection for workers in the informal economy, in particular for entertainment workers, who are present in every country and every economy.

The potential challenges in the implementation of these regulations related to constraints in resources, including the limited number of labor inspectors to regularly cover most of the entertainment establishment throughout the country. While the trade unions will sound warnings if there are violations, it is important that the TCC be able to stand firm in ensuring fair and transparent dialogue to resolve any violations identified in order to ensure effective implementation of these regulations.

There can be both direct and indirect impacts when the regulations have been fully implemented. However, it will take several years for the relevant stakeholders to be fully able to implement, monitor, and hold accountable parties

involved in monitoring compliance with these regulations. It would be useful to conduct a comprehensive evaluation on the impact of these regulations at that time. The findings from the ILO 2009 study provided a baseline of the situation prior to the adoption of these regulations. The regular labor inspector reports of implementation to the Ministry of Labour and Vocational Training could provide progress information. Nevertheless, such an evaluation should take a broader view to go beyond the fulfillment at worksites of the regulations based on the implementation guidelines, to additionally consider the cost and benefits of implementation for entertainment workers; and to entertainment sector businesses; the improved image of tourism in Cambodia; as well as on the unique contribution of the labor sector, complementing that of the public health sector, in confronting HIV epidemics within the country.

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Note

- a. Tripartism: The International Labour Organization is unique in its formation in that it is formed through the constituency of Ministry of Labour, employers' and workers' organizations, and all decisions on International Labour Standards are through a consultation process in dialogue with these three partners.

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