

Policy Framework to Address Labour Exploitation and Informality in Global Tourism

Supply Chains

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Abstract

The global tourism industry is a vital contributor to employment and economic growth, particularly in developing countries. However, it also harbours widespread informality, labour exploitation, and unsafe working conditions. Subcontracting practices, informal hiring, and gendered labour roles have contributed significantly to systemic vulnerabilities in tourism labour markets. These issues are compounded by weak enforcement of labour laws and gaps in national and international regulatory frameworks. Women and migrant workers are disproportionately affected, often relegated to low-wage, insecure positions without access to social protection or legal recourse. While organizations such as the International Labour Organization (ILO) and the United Nations World Tourism Organization (UNWTO) provide ethical guidelines, these are mostly voluntary and lack enforceability. This report critically evaluates the root causes of labour exploitation in global tourism supply chains, focusing on subcontracting, gender-based disparities, and informal hiring practices. Through literature review, case studies, and policy analysis, the report identifies major legal and regulatory shortcomings and proposes a strategic framework for ethical tourism workforce governance. The recommendations include enforceable labour monitoring systems, gender equity programs, international certification schemes, and reforms to better protect informal and subcontracted workers. Ultimately, the report aims to provide a sustainable roadmap for ethical labour practices in tourism worldwide.

Introduction

Tourism is a major engine for global economic development, contributing over 10% to global GDP and supporting more than 330 million jobs worldwide. It encompasses a diverse range of services, including hospitality, food and beverage, transportation, travel planning, cultural activities, and entertainment. In many developing nations, tourism is one of the few industries offering large-scale employment opportunities, especially for women and young people.

Despite its potential to alleviate poverty and foster socio-economic development, the tourism sector remains plagued by systemic labour issues. These include low wages, precarious employment, long working hours, lack of job security, and exposure to health and safety hazards. These conditions are especially severe in developing countries and in sectors characterized by a high degree of informality and weak regulatory oversight.

One of the core structural problems in the tourism labour market is the widespread use of subcontracting. Rather than hiring staff directly, many tourism businesses outsource services to third-party vendors. While this model provides flexibility and reduces administrative costs, it creates a fragmented labour system where responsibility for workers' rights is diluted. Subcontracted workers often lack formal contracts, receive lower wages, and are denied access to basic benefits such as healthcare, paid leave, and social protection.

Gender inequality is another deeply rooted problem in the tourism workforce. Women make up more than half of the global tourism workforce, yet they are disproportionately concentrated in low-wage, low-skilled, and informal roles. They are also more likely to experience sexual harassment, wage discrimination, and limited opportunities for career advancement. Social norms and cultural restrictions in certain countries further restrict women's ability to participate in the formal economy.

In addition to subcontracting and gender disparities, informal hiring practices are widespread in the tourism sector. Informal workers, such as freelance tour guides, street vendors, and seasonal staff, often operate outside the scope of labour laws and are excluded from legal protections and social benefits. During economic downturns or crises, such as the COVID-19 pandemic, informal workers are the first to lose their jobs and have no access to unemployment support or recovery programs.

The legal and regulatory frameworks governing tourism labour markets are often fragmented and poorly enforced. Although international organizations like the ILO and UNWTO provide guidelines and standards for decent work, these are non-binding and rarely enforced at the national level. Many governments prioritize tourism as a source of foreign exchange and investment, often turning a blind eye to exploitative labour practices to remain competitive in the global market.

This report aims to provide a critical evaluation of labour exploitation and informality in the global tourism supply chain. It explores the role of subcontracting, gendered labour divisions, and informal hiring practices in perpetuating exploitation. It also examines legal gaps and regulatory challenges at both the national and international levels. Based on this analysis, the report proposes a comprehensive and enforceable policy framework to monitor labour rights and promote ethical certification of tourism supply chains. The goal is to contribute to the creation of a more equitable, inclusive, and sustainable global tourism labour market.

Literature Review

1) Subcontracting and Labour Fragmentation

Subcontracting refers to the practice of outsourcing services or job functions to external vendors rather than hiring employees directly. In the tourism industry, subcontracting is

prevalent in sectors such as housekeeping, food and beverage, transportation, and maintenance. While subcontracting allows for operational efficiency and cost reduction, it also leads to fragmentation of labour responsibility and oversight.

According to Baum (2015), subcontracted workers often experience lower wages, job insecurity, and lack of benefits compared to directly employed staff. A 2018 study by the ILO found that workers employed through subcontractors were more likely to be denied overtime pay, maternity leave, and access to grievance mechanisms. Employers often evade accountability by shifting responsibility to subcontractors, who in many cases operate informally or lack the capacity to comply with labour regulations.

In regions such as Southeast Asia and the Caribbean, subcontracting has become a means for tourism operators to maintain flexibility in the workforce while avoiding the responsibilities of direct employment. This results in a dual labour market: one comprising formal employees with basic rights and protections, and another composed of subcontracted or outsourced workers with little or no job security.

2) Gendered Labour Divisions

Gender inequality in the tourism sector is systemic and deeply entrenched. Women constitute more than half of the global tourism workforce but are overwhelmingly represented in low-wage and low-skill positions, such as housekeeping, food preparation, and customer service. According to the UNWTO Global Report on Women in Tourism (2018), women earn significantly less than men in comparable positions and are underrepresented in managerial and decision-making roles.

Cultural and societal norms often exacerbate these disparities. In many societies, women are expected to undertake care-related tasks, both at work and at home. As a result, they are steered toward service-oriented roles that are often undervalued and underpaid. Moreover, women working in tourism frequently face harassment, verbal abuse, and limited access to training and promotion opportunities.

Scheyvens (2011) emphasizes the importance of gender-sensitive policies and practices in promoting equity in the tourism workforce. She argues that without deliberate efforts to address gender-based discrimination, tourism development may reinforce existing social hierarchies rather than challenge them.

3) Informality in the Tourism Workforce

The informal economy encompasses jobs that are not regulated by legal or institutional frameworks. In the tourism sector, informal employment includes freelance tour guides, street vendors, seasonal workers, and small-scale service providers. These workers often lack formal contracts, are not covered by labour laws, and do not receive social security or health benefits.

The ILO (2020) estimates that over 60% of global employment is informal, with tourism being one of the sectors most affected. Informality allows employers to avoid regulatory compliance, tax obligations, and responsibilities related to worker welfare. Informal workers, in turn, have limited bargaining power, low job security, and poor working conditions.

Informal employment is particularly prevalent in developing countries and rural areas where tourism is a key economic driver but where formal job opportunities are limited. During crises such as the COVID-19 pandemic, informal workers were disproportionately impacted, losing their livelihoods without access to government relief or social protection.

4) Legal and Regulatory Challenges

Despite the existence of international labour standards, enforcement at the national level remains weak and inconsistent. The ILO's Decent Work Agenda and core conventions provide a framework for promoting fair employment, yet many tourism-reliant countries have not ratified these agreements. Even in countries with strong legal frameworks, enforcement mechanisms are often underfunded, inefficient, or compromised by corruption.

The UNWTO's Global Code of Ethics for Tourism outlines principles for responsible and sustainable tourism, including respect for human rights and fair labour practices. However, the code is voluntary and lacks enforcement mechanisms. National labour laws often fail to cover informal and subcontracted workers, leaving large segments of the workforce unprotected.

In summary, the literature reveals a complex and interrelated set of factors contributing to labour exploitation and informality in tourism. Addressing these issues requires a coordinated and multi-level response involving international organizations, national governments, businesses, and civil society.

Methodology

This report uses a qualitative approach grounded in document and thematic analysis to understand the complex dynamics of labour exploitation in global tourism supply chains.

Primary data sources include:

- Reports and policy documents from international organizations such as the ILO and UNWTO

- Academic studies and journal articles analyzing tourism labour markets
- NGO reports and case studies highlighting specific examples of exploitation
- Comparative reviews of national labour laws in tourism-reliant countries

Thematic analysis focused on four key areas identified in the literature: subcontracting, gendered labour divisions, informal hiring practices, and legal and regulatory gaps. Case studies were selected from regions where tourism plays a major economic role — including Southeast Asia, Sub-Saharan Africa, and the Caribbean — to illustrate the global nature of these challenges.

The limitations of this methodology include the reliance on secondary data, which may not capture recent changes or localized practices, and the lack of fieldwork, which could have provided primary insights from workers and employers. Nonetheless, the approach provides a comprehensive understanding of systemic issues and supports the development of actionable policy recommendations.

Findings

Subcontracting: Cost Savings vs. Worker Vulnerability

The widespread use of subcontracting in tourism businesses helps reduce operational costs but significantly increases the vulnerability of workers. Subcontracted workers often face:

- Lower wages and delayed payments
- Exclusion from training and promotion opportunities
- Lack of access to grievance mechanisms
- Increased exposure to exploitation and abuse

In Thailand's hotel sector, for example, subcontracted cleaners reported earning up to 30% less than directly employed colleagues and lacked health insurance and maternity leave (Fair Tourism Coalition, 2022). This system allows parent companies to deny responsibility for violations, as accountability is transferred to subcontractors who may themselves operate informally.

Gendered Labour Divisions and Inequality

Women's overrepresentation in low-paid, informal, and precarious jobs limits their economic security and social mobility. According to UN Women (2021):

- Women in tourism earn approximately 20–25% less than men
- They are concentrated in roles such as housekeeping, front desk, and food services
- They experience higher rates of sexual harassment, often with no safe reporting channels

Cultural norms and family responsibilities also restrict women's opportunities for formal, full-time employment, further perpetuating inequality.

Informality: Flexibility for Employers, Insecurity for Workers

Informality in the tourism workforce offers employers flexibility to adjust staffing levels based on demand but results in:

- Lack of contracts and social protections
- Exclusion from unemployment benefits and healthcare

- Vulnerability to sudden job loss, especially during crises

During the COVID-19 pandemic, millions of informal tourism workers lost their livelihoods overnight without access to government relief programs.

Legal and Regulatory Gaps

National labour laws often fail to protect subcontracted and informal workers. Even where laws exist, enforcement is typically weak. For example:

- Few tourism-dependent countries have ratified all core ILO conventions
- Labour inspections are often infrequent due to resource constraints
- Political and economic incentives discourage strict enforcement

At the international level, the voluntary nature of the UNWTO Global Code of Ethics means there are no penalties for violations, limiting its effectiveness.

Discussion

The analysis of subcontracting, gendered labour divisions, informal hiring, and legal gaps in the global tourism supply chain illustrates that labour exploitation is not merely a series of isolated abuses but rather a deeply embedded structural issue. This complexity arises from the tension between tourism's dual nature: as both a significant driver of economic growth and a sector highly dependent on cost flexibility and fluctuating demand.

Subcontracting emerges in this context as a double-edged sword. On the one hand, it enables tourism businesses to adjust staffing levels according to seasonality and market fluctuations, which is crucial in an industry vulnerable to external shocks such as pandemics, political instability, or economic crises. On the other hand, subcontracting systematically shifts responsibility for worker welfare from core businesses to smaller, often under-regulated providers. The evidence presented in the findings—such as lower wages, exclusion from training, and lack of grievance mechanisms among subcontracted staff—shows that this system structurally disadvantages workers. By design, it fragments accountability and creates multiple layers through which violations can be obscured. This finding supports earlier literature, including Baum (2015) and Fair Tourism Coalition (2022), which identified subcontracting as a key factor perpetuating worker exploitation.

Informality in tourism further compounds these vulnerabilities. While informality can provide employment opportunities, especially in regions where formal jobs are scarce, it comes at a significant cost to workers: no legal contracts, no access to health or social protection, and minimal bargaining power. The data highlights that during crises, such as the COVID-19 pandemic, informal workers were among the first to lose their livelihoods and had no safety nets. This underscores that informality is not simply a short-term economic necessity but a systemic risk that makes the entire sector more fragile and workers more disposable. It also highlights a critical paradox: while governments and businesses promote tourism for its development potential, the benefits rarely extend to the most vulnerable workers who sustain it.

Gendered labour divisions are a cross-cutting issue that deepens the structural disadvantages of informality and subcontracting. Women dominate customer-facing, low-paid, and precarious jobs, such as housekeeping and food service, yet remain

underrepresented in leadership roles. The persistence of wage gaps and high levels of reported harassment without effective redress mechanisms reveal institutional bias and inadequate protection. Cultural norms in many countries, which shape both employer practices and national policies, further reinforce this inequality. Importantly, the literature shows that gender inequity is not a residual problem but a systemic feature of how the tourism workforce is organized.

From a legal and regulatory perspective, the report's findings highlight a significant enforcement gap. While international frameworks such as the ILO's Decent Work Agenda and the UNWTO's Global Code of Ethics articulate strong principles, they lack binding enforcement mechanisms. National legal systems often have inadequate coverage of subcontracted and informal workers, and where laws do exist, inspections are underfunded or politically deprioritized. This mismatch between standards and enforcement allows exploitative practices to persist, especially in countries that heavily rely on tourism revenue and are hesitant to impose regulations that might deter investment.

Another critical insight is the limited **voice and participation of workers themselves**, especially informal and subcontracted staff. Without representation in trade unions or direct access to grievance mechanisms, these workers remain invisible in policy discussions. This lack of inclusion perpetuates a policy-making process that prioritizes macroeconomic growth over social justice.

The discussion also links directly to the **strategic recommendations** proposed. For example, establishing enforceable monitoring systems and independent audits addresses the transparency problem inherent in subcontracting. Ethical supply chain certification can create market incentives that make fair labour practices an economic asset rather than a cost. Legal reforms and ratification of ILO conventions would strengthen the legal basis for worker

protection, while gender equity measures directly tackle systemic discrimination and promote economic empowerment.

A nuanced finding is that informality cannot be fully eliminated by regulation alone, especially in countries with large informal economies. Instead, policies should seek to protect informal workers and create gradual pathways to formalization, such as portable social protection and registration programs. This balanced approach recognizes economic realities while prioritizing worker rights.

The discussion also emphasizes the need for **multi-stakeholder collaboration**. Governments alone cannot address exploitation if businesses and civil society are excluded. Ethical reforms require buy-in from the private sector, especially multinational tourism corporations that have significant leverage in shaping supply chain practices. Similarly, civil society organizations and trade unions play a crucial role in representing marginalized voices and monitoring compliance.

Finally, the analysis shows that ethical tourism is not a peripheral concern but central to the sector's sustainability and resilience. Exploited and unprotected workers contribute to high turnover, skill shortages, and reputational risks that undermine tourism's competitiveness and development potential. Conversely, fair wages, social protection, and inclusive practices can improve productivity, service quality, and industry reputation.

In summary, this discussion reveals that labour exploitation in tourism is deeply systemic, shaped by economic models, institutional weaknesses, and cultural norms. It is not simply the result of a few unethical actors but an industry-wide challenge requiring comprehensive reform. Addressing these challenges demands an integrated approach that combines enforceable monitoring, legal reform, gender equity measures, and support for informal

workers. Through this, tourism can shift from being a sector associated with vulnerability to one recognized for inclusive and sustainable growth.

Conclusion

Labour exploitation and informality in the global tourism supply chain are deeply entrenched challenges rooted in the very structure of how tourism businesses operate and compete internationally. Subcontracting practices, while intended to increase operational flexibility and cost efficiency, have inadvertently fragmented accountability, making it easier for primary employers to distance themselves from the treatment of workers who ultimately deliver frontline services. This dynamic, documented across multiple regions and business types, highlights the tension between economic objectives and social responsibility in tourism.

The problem of informality compounds this issue, affecting a significant proportion of the tourism workforce worldwide. Informal workers, whether they are seasonal staff, freelance guides, or vendors, typically lack written contracts, access to social protection, and the security of being recognized by law. This exclusion not only leaves them vulnerable to exploitation and sudden economic shocks, as seen dramatically during the COVID-19 pandemic, but also undermines the broader goals of decent work and sustainable economic growth.

Gender inequality runs parallel to these structural issues, amplifying the vulnerability of women in tourism. The overrepresentation of women in low-paid, informal, and customer-facing roles — combined with wage gaps and underrepresentation in leadership — reflects persistent cultural biases and institutional shortcomings. Addressing gender disparities is

therefore not only a moral imperative but a necessary strategy to unlock the full economic and social potential of the tourism workforce.

Despite the existence of international frameworks, such as the ILO's Decent Work Agenda and the UNWTO Global Code of Ethics, implementation remains largely voluntary and inconsistent across countries. Many tourism-dependent nations prioritize short-term competitiveness and foreign investment over labour reforms, resulting in limited enforcement of existing laws. National regulatory systems often lack resources, face corruption, or are constrained by political considerations that favour business interests over worker protection.

Given these intertwined challenges, the report argues that isolated reforms are insufficient. Instead, what is required is a **coherent and enforceable policy framework** that bridges international standards and local realities. This framework must simultaneously strengthen legal protections, introduce credible monitoring and certification mechanisms, and actively empower vulnerable groups such as women and informal workers.

The recommended strategies, including enforceable labour rights monitoring, ethical supply chain certification, legal reform, gender equity measures, and support for informal workers, are mutually reinforcing. Together, they provide a roadmap for moving beyond symbolic commitments toward practical and measurable improvements in workers' lives. Equally critical is the active engagement of all stakeholders — from governments and multinational tourism corporations to local NGOs and trade unions — to ensure policies are grounded in local contexts and truly benefit the people most affected.

Ultimately, tourism's promise as a tool for sustainable and inclusive development cannot be fulfilled unless the rights, dignity, and safety of its workers are safeguarded. By placing ethical employment and social justice at the heart of tourism policy and practice, the industry

can evolve from being a source of vulnerability to a model of equitable economic opportunity. Only then can tourism genuinely align with the broader goals of human development and global sustainability.

Recommendations / Strategic Framework

Based on the critical evaluation of subcontracting, gendered labour divisions, informal hiring, and legal gaps, this report proposes a **multi-layered, enforceable strategic framework**. This framework aims to tackle exploitation, reduce informality, and embed ethical standards in tourism supply chains. The recommendations are grouped into six interrelated pillars.

Enforceable Labour Rights Monitoring

One of the biggest barriers to ethical tourism is the lack of credible, independent monitoring of labour practices. Current models often rely on voluntary codes of conduct, which have limited impact due to self-reporting and conflicts of interest.

To address this, governments and international bodies should establish independent tourism labour observatories. These observatories would have the mandate to:

- Collect and analyze data on wages, working conditions, subcontracting, and informality;
- Identify sectors and regions with higher risks of exploitation;
- Publish regular reports to increase transparency.

In addition to observatories, there should be a requirement for annual third-party audits of medium and large tourism businesses, including hotels, resorts, tour operators, and major

subcontractors. These audits must be based on objective standards aligned with ILO conventions and UNWTO guidelines. Public disclosure of audit findings would create reputational pressure for compliance.

Moreover, governments should establish accessible reporting systems, such as hotlines and digital platforms, allowing workers and civil society to report abuses confidentially. These reports should trigger mandatory investigations by labour inspectors, reducing the gap between policy and enforcement.

The combination of observatories, audits, and reporting platforms would transform monitoring from a passive system to an active, enforceable mechanism that deters violations and empowers workers.

Ethical Supply Chain Certification

Certification can be a powerful tool to create market incentives for ethical behaviour. However, many current certifications in tourism are limited to environmental standards (e.g., eco-labels) and rarely address labour rights.

This report proposes the creation of a **“FairTourism” certification**, an international, labour-focused standard. To qualify, tourism businesses would have to demonstrate:

- Compliance with minimum wage and decent work standards;
- Non-discriminatory practices, including gender equity measures;
- Formal contracts for all workers, including those hired indirectly;
- Mechanisms to address grievances and workplace harassment.

Certification should not be merely symbolic. It should be **linked to economic incentives**: certified businesses could receive tax benefits, preferential access to government subsidies, and visibility in international marketing campaigns.

To ensure credibility, certification must be **managed by an independent body** with multi-stakeholder governance, including representation from trade unions, women's organizations, and civil society. Certification criteria should be reviewed regularly to remain relevant and responsive to emerging challenges, such as the impact of digital platforms and automation on jobs.

By combining ethical certification with market advantages, this approach aligns business interests with worker welfare and transparency.

Legal and Regulatory Reform

Legal frameworks remain the backbone of labour protection, but many countries have outdated or incomplete laws that fail to cover informal and subcontracted workers. A strategic approach must focus on both **updating national laws** and ensuring **better enforcement**.

First, governments should ratify and implement **core ILO conventions**, including those that protect domestic, migrant, and part-time workers — categories heavily represented in tourism. National laws should then be aligned with these conventions, closing gaps such as:

- Extending coverage to subcontracted and informal workers;
- Mandating written contracts and clear wage structures;
- Including provisions for safe and equitable workplaces.

Second, the establishment of **fast-track labour courts or arbitration panels** in key tourism regions can expedite resolution of labour disputes. Long delays in courts often discourage workers from seeking justice.

Third, penalties for violations must be substantial enough to outweigh the economic benefits of exploitation. This includes increased fines, temporary license suspensions, or public “naming and shaming” for repeat offenders.

Finally, governments should invest in **labour inspection capacity**, training inspectors in tourism-specific challenges, such as seasonality and subcontracting. Digital tools, such as real-time payroll monitoring, can also increase transparency and reduce corruption.

Gender Equity Measures

Gender inequality is both an ethical issue and an economic barrier that limits the potential of the tourism workforce. Addressing this requires structural and cultural changes supported by policy.

Mandatory **equal pay audits** should be introduced for tourism businesses, revealing pay gaps and forcing management to justify disparities. Governments could require the publication of these audits, as seen in some European countries, creating accountability through transparency.

To address the underrepresentation of women in leadership, targeted **leadership and skills training programs** should be supported by both governments and businesses. Scholarships and mentorship schemes can help women advance from entry-level positions to management.

Sexual harassment remains widespread in tourism, partly due to the customer-facing nature of work and power imbalances. Businesses should be legally required to have **clear anti-harassment policies** and confidential, victim-centered reporting mechanisms.

Lastly, national tourism policies should mainstream gender equity, making it a criterion in tourism investment approvals and licensing.

Support for Informal Workers

Simply outlawing informality is neither feasible nor just, given its scale in tourism. Instead, policies must recognize informal workers and create pathways to formalization.

Governments can introduce **portable social security schemes** — micro-insurance and pension plans that workers can carry across seasonal or part-time jobs. These programs should be designed with low administrative barriers to encourage enrollment.

Registration programs can help informal workers gain official status without losing flexibility. For example, licensed street vendors or guides could access training, health coverage, and small business grants.

Legal aid and **rights awareness campaigns** are also crucial. Many informal workers do not know their rights under existing laws. NGOs and unions, supported by public funding, can fill this gap through workshops and media campaigns.

By reducing the vulnerabilities of informal workers, these measures contribute to a fairer and more resilient tourism labour market.

Public-Private Partnerships and Stakeholder Engagement

Sustainable change requires collaboration among governments, businesses, trade unions, civil society, and international organizations. Public-private partnerships (PPPs) can fund worker training, gender equality initiatives, and research on labour market trends.

Governments should also incentivize ethical practices by offering tax breaks or marketing support to businesses that demonstrate compliance with labour standards.

Finally, tourism policy-making bodies at the national and regional levels should include worker representatives and civil society. Their participation ensures that policies reflect real worker needs and are more likely to gain broad support.

These partnerships can align economic development with social justice, transforming the tourism industry into a force for inclusive and sustainable growth.

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