

## **The Legal Frame Work of Trade Union Activism and the Role of National Industrial Court (NIC) in Handling Trade Disputes**

**Leonard C. Opara, Esq. LLB (Lagos) BL, LLM (Ife), ACTI**  
Lecturer and Notary Public, is Acting HOD  
Dept. of International Law & Jurisprudence, Faculty of Law  
Nigeria Police Academy, Wudil, Kano State, Nigeria

### **Abstract**

*Nigeria does not have a regulated market for trade union activism. However, some Nigerian legislations and laws have been applied by the various courts involved in settling disputes between Trade Unions, employers of labour and members of trade unions as well as employees' rights. Nigeria law and policy directives by government have encouraged trade union negotiations and collective bargaining in trade dispute resolutions and settlements. This article overviews development in labour relations and the laws relating to trade union and the trade dispute resolutions or adjudications by the National Industrial Court (NIC) of Nigeria, the Nigerian government's position and review the development of legislation by the National Assembly. The article discusses the various legal issues that are encountered in trade union and the role of National Industrial Court in trade dispute settlement and how it can effectively manage trade union activism. This article recommends that a Labour Court of Appeal to be provided in the constitution since it is a specialised court mainly for labour and industrial workers.*

### **Introduction**

Like many other developing countries, Nigeria has engaged in labour relations and the entire world has been engulfed by a gale of trade union activism embarked upon by the workers. It is settled law, both within local jurisprudence and the international arena that there is inherent right in workers, be it in the public or the private sector to form a trade union or association for the welfare and interest of its members. There are various attempts to regulate the rights of association through legislation in the various countries.

There seems to be consistent struggle between the class of employers on the one hand and the class of employees on the other on the issue of trade union activism. We consider it very pertinent to take a critical look at the fundamental basis of this workers' right to trade union activism and how its exercise impinges on the right of the employees. More importantly, too, is the impact of this interplay of conflicting interests on the nation as a whole. It is in this vein that this discourse would pay a closer attention to the incidence of trade union activism and trade dispute within the public and organised private sector. It is becoming appalling that the government has demonstrated an inability to curb this rising wave among its workers especially in a military administration even though in democracy trade unionism plays an active role in the governance of a state.

### **What is Trade Union?**

Trade union is an organisation of workers formed to protect such of their interests that are incidental to their employment. Trade unions include employers association. It is also an agent of social economic change in the social strata. Trade union can be defined as an association of wage /salary earners with the object of safeguarding and improving the wage and employment conditions of its members and to raise members' social status and standard of living in the community. A trade union or labour is an organisation of workers who have banded together to achieve common goals in key areas such as wages, hours, and working conditions, forming a cartel of labour. The trade union, through its leadership, bargains with the employer on behalf of union members (rank and file members) and negotiates labour contracts with employers. This may include the negotiation of wages, work rules, complaint procedures, rules governing hiring, firing and promotion of workers, benefits, workplace safety and policies. The agreements negotiated by the union leaders are binding on the rank and file members and the employer and in some cases on other non-member workers.

These organisations may comprise individual workers, professionals, past workers, or the unemployed. The most common, but by no means only, purpose of these organisations is maintaining or improving the conditions of their employment. Over the last three hundred years, many trade unions have developed into a number of forms, influenced by differing political and economic regimes. The immediate objectives and activities of trade unions vary, but may include:

**Provision of benefits to members:** Early trade unions, like Friendly Societies or Cooperatives Societies often provide a range of benefits to insure members against unemployment, ill health, old age and funeral expenses. In many developed countries, these functions have been assumed by the state; however, the provision of professional training, legal advice and representation for members is still an important benefit of trade union membership.

**Collective bargaining:** Where trade unions are able to operate openly and are recognised by employers, they may negotiate with employers over wages and working conditions.

**Industrial action:** Trade unions may enforce strikes or resistance to lookouts in furtherance of particular goals.

**Political activity:** Trade unions may promote legislation favourable to the interests of their members or workers as a whole. To this end they may pursue campaigns, undertake lobbying or financially support individual candidates or parties (such as the Labour party in Britain) but the situation is different with regard to Labour Party in Nigeria as a political party for public office.

### ***Trade union***

Trade union<sup>2</sup> is “any combination of workers or employers, whether temporary or permanent, the purpose of which is to regulate the terms and conditions of employment of workers, whether the combination in question would or would not, apart from this decree, be an unlawful combination by reason of any of its purposes being in restraint of trade and whether its’ purposes do or do not include the provision of benefits for its workers”.

In **Registered Trustees of National Association of Community Health Practitioners of Nigeria and Others V Medical and Health Workers Union of Nigeria and Orthers<sup>3</sup>**. The facts of the case is where a registered trade union Medical and health Workers Union of Nigeria and others has applied to the Registrar of Trade Union not to register Senior Staff Trade Union of National Association of Community Health Practitioners of Nigeria which caters for the same interest as the one applying for registration. The court held it is the direction of the registrar after he would have made his investigation and become satisfied to ensure that there is no other registered trade union in existence, which has the same interest. From this definition, a trade union is a voluntary incorporated association with the aim of regulating the terms and conditions of employment of workers subject to registration by the Registrar of Trade Union in Nigeria. However, trade unions forms part of the political rubric of society and often than not political power accrue to labour leaders because of their steady access to and influence over great numbers of people. But these days’ business unionism and trade union economise the struggle for a government patronage.

### ***The Nigerian Labour Congress***

The Nigeria Labour Congress (NLC) and the Trade Union Congress (TUC) are the central trade union organisation for the thirty six (36) industrial unions in the country and therefore provides a common platform for its affiliates. It is a symbol of unity and strength of the country’s trade union movement. It was formally constituted as the only national federation of trade unions in the country in 1978. The organisation has had a checked history, surviving three instances of dissolution of its national organs and consequent appointment of state administrators. The first was in 1998 under the military regime of General Ibrahim Babangida. Congress’ opposition to the anti-people Structured Adjustment Programme incensed the military administration to take over Nigeria Labour Congress. The second military intervention was in 1994 during the regime of General Sani Abacha, whose government also became fed up with the labour movement’s agitation for the restoration of democracy. Like the initial case, the military and the present democratic government have cause on issues of labour relations and good governances to the Nigerian society.

The largest organisation of trade union members in the world is the Brussels-based International Trade Union Confederation, which today has approximately 309 affiliated organisations in one hundred and fifty six countries and territories, with a combined membership of 166 million. Other global trade union organisation includes the World Federation of Trade Unions.

National and regional trade unions organizing in specific industry sectors or occupational groups also form global union federations, such as Union Network International and the International Federation of Journalists.

### ***What is Collective Bargaining?***

- (a) Collective bargaining is the process of negotiation on a whole range of issues bordering on the regulation of the terms and conditions of employment between workers and employers or government, aimed at collective agreement.
- (b) Collective bargaining is seen as the most rational process of determining and reviewing the terms and conditions of employment. The process manifests the power relationship between the employers and the trade unions.
- (c) Collective bargaining goes beyond the process of negotiation between unions and employers on issues directly affecting conditions of employment. It is also a means of limiting unilateral decisions and actions by employers and governments.
- (d) Strong, stable, well focused and democratically run unions expand the scope of collective bargaining and thereby strengthen industrial democracy.
- (e) The role of the NLC in collective bargaining shall be as follows:
  - (i) Providing support data for negotiations through research.
  - (ii) Continually reviewing the national minimum wage and ensuring that its negotiation involves broader consultations with all stakeholders.
  - (iii) Influencing labour legislation.
  - (iv) Ensuring acceptance of collective agreement in all sectors of the economy.
  - (v) Intervening in industrial disputes with the aim of strengthening its affiliates.
  - (vi) Enhancing the bargaining capacity of affiliates.
  - (vii) Ensuring adequate protection for negotiators against possible victimisation.
  - (viii) Ensuring all collective bargaining is gender sensitive and serves to enhance the interest of women.
  - (ix) Ensuring that collective bargaining take into account the need to protect industry and work organisation.

### ***Effect of Trade Union and Collective Bargaining***

Section 27 of the Trade Union Act allows for the amalgamation of two or more trade unions where it is now found that the two take charge of the affairs of the same set of workers. Section 28 of the same Act further allows alterations of the rules of a trade union. However, where it is adjudged appropriate to dissolve an existing trade union, such is provided for by the Act in sections 9 and 10.

In case of collective bargaining, special legal problems may arise only if there is a change in the identity or status of the employer. Even then, if the old employer had transferred its undertaking to another, the new company normally takes on the assets and liabilities of the outgoing company. In that case the existing contracts of employment must be continued as they stand of, including the terms of collective agreements, which have been duly incorporated therein. However, vague promises made by the old employer would not be legally binding on the new company.

### ***National Industrial Court (NIC)***

The National Industrial Court was established in 1976 by virtue of section 19 (1) of the Trade Disputes Decree No.7 of 1976<sup>7</sup> as a Revenue Court (now Trade Disputes Act, Chapter T8, Volume 15, Laws of the federation of Nigeria, 2004). Section 19 (1) of the 1976 Act provides that the court shall have jurisdiction and power as conferred on it by the said law or any Act with respect to the settlement of trade disputes, the interpretation of collective agreements and matters connected therewith.

In 1992, the Trade Disputes Act was amended by the Trade Disputes (Amendments) Decree N0.47 of 1992. By virtue of section 5 (a) thereof the court became a superior court of record, with the status of a high court. Section 20 of the Trade Dispute Act<sup>4</sup> and section 1(a) of Trade Disputes (amendment) Decree No. 47 of 1992 gave exclusive jurisdiction to the National Industrial Court in matters of trade disputes, which is National Industrial Court Act 2006.

The new Act empowers the President of the Court to create Judicial Divisions for the court so that the court may perform its statutory duties of dispensing justice most effectively.

The court now has the following judicial division for the effective performance of its duties namely, Lagos, Kano, Abuja, Enugu, Jos, Ibadan, Maiduguri, Calabar, Akure, etc.

The objective behind establishing the court is to create a specialised court to handle special matters which are connected with the economic growth, industrial relations development, and peaceful co-existence between and among labour and employers of labour as well as labour policy formulated i.e. the government. There is no gainsaying that from history, none of the developed economies have been able to grow without a stable industrial mechanism for settlement of industrial disputes. In order to raise the status of the court and to expand its jurisdiction to meet emerging challenges in labour and industrial relations, the national Assembly in the exercise of its statutory duties enacted a new National Industrial Court Act on 14<sup>th</sup> June, 2006 which was assented to by His Excellency, Chief Oluasegun Obasanjo, GCFR, the former President of the country without delay. The Act therefore, takes its root from the powers derived by the legislators who made the law from the constitution.

The NIC Act provides for the establishment of the court. Section 1 (1) of the Act provides that “there is established a court to be known as the National Industrial Courts which shall be a court of a superior record by virtue of section 1(3) ( a). The president of the court shall rank equal with the Chief judge of the Federal High Court or the Chief judge of the High court of the Federal Capital Territory, Abuja, in precedence and the judges of the court shall, in like manner, rank with the judges of the Federal High Court or High Court of the Federal Capital Territory, Abuja”. Furthermore, section 7 (1) of the Act states the jurisdiction of the court in civil causes and matters relating to labour, including trade unions and industrial relations; and environment and condition of work, health, safety and welfare of labour, and matters incidental thereto; and relating to the grant of any order to restrain any person or body from taking part in any strike, lock-out or any industrial action; relating to the determination of any question as to the interpretation of any collective agreement, any award made by an arbitral in request of a labour dispute, organisational dispute, the terms of settlement of any labour dispute or organisational disputes as may be recorded in any memorandum of settlement, any trade union constitution, and any award or judgement of the court.

Section 7 (4) stipulates that an appeal shall lie from the decisions of an arbitral tribunal to the court as of right in matters of disputes specified in subsection 1(a) of this section. Section 7 (5) for the purposes of subsection 4 of this section, a party to an arbitral award shall be entitled to obtain a copy of the records of arbitral proceedings and the award from the arbitral tribunal. Section 7 (6) further states that the court shall, in exercising its jurisdiction or of the powers conferred upon it by this Act or any other enactment or law have due regard to good or international best practice in labour or industrial relations shall be a question of fact.

From the foregoing the intension of the legislation is to give the National Industrial Court exclusive jurisdiction in all matters pertaining to trade union disputes. To construe this interpretation clause as conferring on the national Industrial Court the jurisdiction to adjudicate on all manner of disputes concerning employment matters would do a great violence to the provisions of Section 251 (1) (q), (r) and (s) of the 1999 constitution as amended. It cannot be overlooked that Chapter 432 being an existing law within the meaning of section 315 of the 1999 constitution cannot be given an effect which overrides the clear provisions of section 251 (1), (q), (r), and (s) of the 1999 constitution. Any provision of an existing law, which is in conflict with the provisions of the 1999 constitution, must be pronounced void to the extent of such inconsistency. This is the position of the Supreme Court decision in **Olorunfoba-Oju V Dopamu**<sup>5</sup> per **Oguntade JSC**

“where he stated that to give jurisdiction in all matters relating to disputes in employment matters to the national Industrial Court will clearly overburden a special purpose court which the national Industrial Court was designed to be.”

See also **NEPA V Edegbenro & Ors.** 6 where the court held that ‘the aim of paragraph (q), (r) and (s) of sub section 1 of section 230 of the 1999 constitution as amended was to vest exclusive jurisdiction in the Federal High Court in matters in which the Federal government or any of its agencies in such matters notwithstanding the nature of the claim in the action. The exclusivity of the Federal High court jurisdiction on those matters must by necessary implication apply to other courts including the national Industrial Court, irrespective of the nature of the claim filed before it.

In my opinion I am of the view that matters of trade dispute among trade unions and representative of government on labour relations matters are to be handed by the special court (national Industrial Court) are the intention of the legislators who made that law.

Section 40 of the 1999 constitution of Nigeria as amended states in parts: “ every person shall be entitled to assembly freely and associate with other persons, **and in particular, he may form trade union or any other association for the protection of his interests**” (emphasis my). The International labour Organisation (ILO) Convention 87 and 98 recognises Freedom of Association and Protection of the Right to Organise Convention and Right to Organise and Collective Bargaining Convention respectively, Article 2 of the Convention 87 states: “workers and employers, without distinction shall have the right to establish and, subject only to the rules of the organisation concerned, to join organisations of their own choosing without previous authorization.” The right to join a trade union is mentioned in article 23, subsection 4 of the Universal Declaration of Human Rights (UDHR), which also states in article 20, subsection 2 that “ no one may be compelled to belong to an association”. Prohibiting a person from joining or forming a union, as well as forcing a person to do the same (e.g. “closed shops” or “union shops), whether by a government or by a business, is generally considered a human rights abuse. Similar allegations can be levelled if an employer discriminates based on trade union membership. Attempts by an employer, often with the help of outside agencies, to prevent union membership amongst their staff are known as union busting.

The above provisions form part of our laws because Nigeria have ratified the Conventions and domesticated it into our local laws. See **Abacha V Fawehinmi** 7.

### **What is Trade Dispute?**

Any dispute between employers and employees or within such groups interse, relating to terms and conditions of employment, discipline, union membership, etc. is termed trade dispute.<sup>8</sup> Section 27 of the Trade Dispute Act 9 defines Trade Dispute as meaning “any dispute between employers and employees or workers or between workers and workers which is connected with the employment and physical conditions of work of any person.” Trade dispute is when an employer or group of employers and a trade union disagree following failure of one side to meet the demand of the other for the amelioration or removal of a grievance(s). It shows that trade dispute tend to result in some industrial action which may take the form of strike, look-out, work to rule, go slow, work in or sit in. These actions are overt manifestation of industrial conflict, which are normally expressed through recognised procedures where there are unions.

Two major issues are highlighted to trade disputes namely

- (a) Parties to a trade dispute
- (b) Subject matter of trade dispute.

Parties can be either between workers and employers or between workers and workers. The subject matter may be (i) employment or non-employment or (ii) terms of employment or (iii) conditions of work of any person.

**Types of Disputes:** International Labour Organisation (ILO) has categorised trade disputes into three namely

- (a) **Grievance dispute**
- (b) **Recognition dispute and**
- (c) **Dispute of interest.**

**Grievance Dispute** arises from workers protesting against unfair treatment by the management. Management discriminates against certain workers because of participation in trade union activities. Note that if such trade union has been registered under the trade union Act, such discrimination will be contract to the law.

**Recognition Disputes** arises from when management or employer refuses to extend recognition to a trade union. Where a trade union has been registered, it is empowered by law to perform acts in furtherance of its purposes.<sup>10</sup> The recognition of registered trade unions by employers is compulsory under the Nigerian law.

Section 24 of the Trade Union Act provides:

- (1) **‘subject to this action, where there is a trade union of which persons in the employment of an employer are members. The trade union shall without further assurance, on recognition in accordance with the provisions of the Act be entitled to recognition by the employer.**
- (2) **If an employer deliberately fails to recognise any trade union registered pursuant to the provisions of subsection (1) of this section, he shall be guilty of an offence and be liable on summary conviction to a fine of N1000.00.**

**Disputes of Interest:** It usually manifest where there is a disagreement over terms and conditions of employment or service. Where a trade union makes demand asking for a new term and conditions of service, the employer is usually expected to negotiate in order for the parties to reach an agreement. Where that employer fails to negotiate or both for the parties despite negotiation fail to reach an agreement, a dispute of interest usually would arise. The means of resolving these disputes could be through conciliation or arbitration, or/and outright litigation depending on the legal system. In Nigeria, all these options are available with the National Industrial Court (NIC) being the court of competent jurisdiction to handle such dispute or matter as the case may be.

### ***Trade Unions Struggle/Activism for Democracy in Nigeria***

In Nigeria, public sector trade unions are represented under the umbrella of the National Labour Congress (NLC) and the Trade Union Congress (TUC) which has its interest in the political affairs and governance of the country and it is out to ensure the realisation of certain socialist tendencies by ensuring the welfare of the working class. Trade union performs significant roles in industrial relations as they serve as catalyst in the struggle for a living wage, good conditions of service and as defender of the interest of the working class and the under-privileged or down-thrown in the society. They also promote job security and ensure a fair treatment on the job.

The International Labour Organisation (ILO) in its declaration has recognised the following principles:

- (i) Labour is not a commodity.
- (ii) Freedoms of expression and of association are essential to sustained progress.
- (iii) Poverty anywhere constitutes a danger to prosperity everywhere.
- (iv) All human beings, irrespective of race, creed or sex have the right to pursue both their material wellbeing and their spiritual development in conditions of freedom and dignity of economic security and equal opportunity.

Labour indeed is the dynamo in the industrial relations system. On behalf of the workers or employed, trade unions make agitations for new demands and social change in the work environment. On the other hand, the government is the policy and lawmakers as well as the regulators of industrial relations in the state. They engage in direct or indirect contact with trade unions, employers, workers, management and the society at large through the enactment of laws or policies and the various agencies established to regulate industrial and labour relations. For instance the recent strike and trade disputes between the Academic staff Union of Universities (ASUU) and the Federal government Nigeria that lasted for about six months industrial dispute in which some Civil Society Group sued ASUU at the National Industrial Court with Suit No. NICN/ABJ/242/2013 over illegal and arbitrary strike asking the court to whether or not ASUU can declare a strike over purported breach of the memorandum of agreement by the federal government.

Also to declare the strike by ASUU as illegal and a breach of the constitutional right of the students to education. The group were also seeking a relief for the award of exemplary and special damages against the ASUU. However, ASUU filed a preliminary objection through their counsel in the court challenging the suits which was adjourned for hearing to 3<sup>rd</sup> January 2014 before the disputes was resolved through negotiations between the federal government, NLC and TUC representatives and the ASUU on 11<sup>th</sup> December 2013. This struggle by ASUU was to ensure that government put the Nigerian university system in order.

If the trade union leaders address them properly and consistently to this task, the future struggles would meet the working masses better prepared and can lead to the socialist transformation of Nigeria. If not, the prevailing agonies of the masses will become prolonged and further struggles likely put in jeopardy.

### ***Other Jurisdictions***

In South Africa, trade unions are important force dating back to history to the 1880s. It is a reflection of the racial disunity of the country with the earliest unions being predominantly by the white workers. Trade union in South Africa also fought the apartheid and racial discrimination, played an important role in developing political economic resistance, and eventually were one of the driving forces in realizing the transition to an inclusive democratic government.

In 1986, the largest strike up to date was engaged by the unionism to ‘stayed away’ from work by the black workers in a demand for recognition of an official ‘May Day’ holiday. Presently, trade unions are recognised within the 1996 constitution of South Africa, which provides for the right to join trade unions, and for unions to collectively bargain and strike.

This has translated into the Labour Relations Act, which established the working framework for both unions and employers. Three institutions have also been created to further the goals of reducing industrial relations conflicts, and both eliminating unfair discrimination and redressing past discrimination in the workplace; THE National Economic Development and Labour Council (NEDLAC), the Labour Court, and the Council for Conciliation, Mediation and Arbitration (CCMA).

The Labour Relations Act 2002 is to give effect to section 27 of the South Africa Constitution by regulating organisational rights of trade unions, promoting collective bargaining, regulating the right to strike and the recourse to lockouts, as well as providing mechanisms for dispute resolution and the establishing of Labour Court and Labour Appeal Court as superior courts, 'with exclusive jurisdiction to decide matters arising from the Act. The Act also addresses employee participation in decision-making, and international law obligations in respect to labour relations. The Labour Relations Act does not apply to the South African National Defence Force, the National Intelligence Agency, or the South African Secret Service. Also in South Africa, they have bargaining councils, which are formed by registered trade unions and employers' organisations to deal with collective agreements, attempts to solve labour disputes, and make proposals on labour policies and laws. Furthermore, in South Africa, they have the Workers Forum in some establishments where the union is not in existence to play the vanguard role in labour and economic relations.

In the light of the above, our trade unions should borrow a leaf from them in advancing the cause of its members here in Nigeria to form a formidable force through constitutional means.

### ***Conclusion***

In many countries, a union may acquire the status of a "juristic person" (an artificial legal entity), with a mandate to negotiate with employers for the workers it represents. In such cases, unions have certain legal rights, most importantly the right to engage in collective bargaining with the employer (or employers) over wages, working hours, and other terms and conditions of employment. The inability of the parties to reach an agreement may lead to industrial actions, culminating in either strike action or management lockout, or binding arbitration. In extreme cases, violent or illegal activities may develop around these events.

In other circumstances, unions may not have the legal to represent workers, or the right may be in question. This lack of status can range from non-recognition of a union to political or criminal prosecution of union activists and members, with many cases of violence and deaths having been recorded both historically and contemporarily. Unions may also engage in broader political or social thought or struggle. Social unionism encompasses many unions that use their organisational strength to advocate for social policies and legislation favourable to their members or to workers in general. As well, unions in some countries are closely aligned with political parties. The Trade unions as registered organisations under the Register of Trade Unions and the Ministry of Labour and Productivity shall also work together for the welfare of its members and non-members for good governance.

However, where there is a dispute among the parties the law provides that trade disputes shall be settled in National Industrial Court but the provisions of 1999 constitution also gives legal rights to other courts of competent jurisdiction to entertain matters relating to workers' rights in contract of employment. Furthermore, we shall look at other jurisdiction such as South Africa where their laws provides for a Labour Court of Appeal but the case is different in Nigeria where the National Industrial Court does not entertain appeals on trade disputes irrespective of the constitutional proviso for appeal courts in all causes. The constitution needs to be amended to make a proviso for the Labour Court of Appeal since it is a specialised or special court mainly for Labour and Industrial matters. This is away to improve the industrial disputes in Nigeria which includes the review of the roles and functions of National Industrial court and the independency of the National Industrial Court to handle industrial disputes without government interference.

### **References**

- A.A. Adeogun, (2002) Labour and the Fallout of privatisation and Commercialisation in the Commercial and Industrial Law Review, (2002) Vol.1, pg. 1-15 published by the Department of Commercial and Industrial Law, University of Lagos, Akoka, Nigeria.
- BamdideleAturu, ed(2001) a Hand book of Nigerian Labour Laws published by Fredrich Ebert Stiffung (FES), Lagos.
- Elijah Okougbo, (2004) Strategic Issues on the dynamics of Industrial Relations: Theory & Practice, Lagos, Publishers Wepoapo Enterprises.
- Fajana Sola, (1995) Industrial Relations, Published by Malthouse press Ltd, Lagos.
- Fajana Sola, (2000) Industrial Relations in Nigeria: Theory and Features, 2<sup>nd</sup> ed., Labofir& Co., Lagos.
- O.O.Orifowomo, ‘An Appraisal of the right to Strike under Nigerian Labour Laws’ in Ife Juris Review (2004) Vol.1, IFJR, part 2.
- OladosuOgunniyi (1991) Nigerian Labour and Employment Law in Perspective, published by Folio Publishers Ltd., Lagos.

### **Statutes**

- The 1999 Constitution of the Federal Republic of Nigeria.
- Trade Dispute Act Cap T8 Laws of the Federation 2004
- Trade Union Act (Amendment) 2005
- Trade Union Act Cap 437 Laws of the Federation 1990 (as amended)
- International Labour Organisation (ILO) Conventions.
- Universal declaration of Human Rights (UDHR)