



# **The right to strike in the public services**

## **Slovenia**



## **Contents**

- 1. Legal basis**
- 2. Who has the right to call a strike?**
- 3. Definition of strike**
- 4. Who may participate in a strike?**
- 5. Procedural requirements**
- 6. Legal consequences of participating in a strike**
- 7. Case law of international/European bodies**
- 8. Bibliography**

## **Notes**

This factsheet reflects the situation in April 2021; it was elaborated and updated by Diana Balanescu (independent expert), reviewed by EPSU/ETUI; comments received from the Slovenian EPSU/ETUC affiliates, ZSSS and Pergam, were integrated.

## 1. Legal basis

### International level

Slovenia has ratified:

#### UN instruments<sup>1</sup>

**International Covenant on Economic, Social and Cultural Rights**

(ICESCR, Article 8)

**International Covenant on Civil and Political Rights**

(ICCPR, Article 22)

#### ILO instruments<sup>2</sup>

**Convention No. 87 concerning Freedom of Association and Protection of the Right to Organise**

(on 29 May 1992)

**Convention No. 98 concerning the Right to Organise and to Bargain Collectively**

(on 29 May 1992)

**Convention No. 151 concerning Labour Relations (Public Service)**

(on 20 September 2010)

**Convention No. 154 concerning the Promotion of Collective Bargaining**

(on 2 February 2006)<sup>3</sup>

### European level

In particular, ratification of:

**Article 6(4) (the right to collective action) of the Revised European Social Charter (ESC)**

with no reservations (ratification on 7 May 1999; entry into force 1 July 1999)<sup>4</sup>

Slovenia has accepted **the Additional Protocol to the European Social Charter Providing for a System of Collective Complaints**

(entry into force on 1 July 1999)<sup>5</sup>

**Article 11 (the right to freedom of assembly and association) of the European Convention on Human Rights**

(ratification and entry into force on 28 June 1994)<sup>6</sup>

## National level

### The Constitution of Slovenia

Article 77 of the Constitution of the Republic of Slovenia<sup>7</sup> guarantees the right to strike: *'Employees have the right to strike. Where required by the public interest, the right to strike may be restricted by law, with due consideration given to the type and nature of the activity involved.'*<sup>8</sup>

These constitutional provisions have been interpreted by scholars to mean that it is the workers who are the bearers of the right to strike, even though this right may be exercised only collectively.<sup>9</sup> According to Article 76 of the Constitution, *'The freedom to establish, operate and join trade unions shall be guaranteed.'* Thus, in guaranteeing trade union activity, this article implicitly provides that trade unions may organise a strike.<sup>10</sup>

### Applicable laws

- **In general:** Article 1(1) of the Law on Strikes/Strike Act<sup>11</sup> defines a strike as an organised stoppage of work by workers, with the purpose of exercising economic and social rights and interests arising from work.

According to this definition, a strike may be organised for the purpose of exercising not only interests related to work, but also economic and social rights. Thus, the right to strike is not limited to the conclusion of a collective agreement, nor is it required that a strike be aimed at inducing the employer to enter into a collective agreement.<sup>12</sup>

- **Specific laws relevant to public sector:** e.g. Law on Public Employees/Civil Servants Act, Defence Act, Police Act, Enforcement of Penal Sanctions Act, Health Services Act, Air Navigation Act, Customs Service Act, Railway Transport Act, Medical Practitioners Act, Veterinary Medicine Act and Roads Act.

**There is very little case law on the right to strike.** As mentioned above, the right to strike is explicitly recognised by the Constitution and ordinary statutory law.

**The role of collective agreements** is to provide for measures to be taken during a strike so as to ensure that 'minimum services' are maintained (mostly with respect to the public services listed above).

The **Strike Act** specifies that the 'social partners' must cooperate to provide a minimum level of services. In addition, the Strike Act provides that material compensation for the period that workers are on strike must be determined by collective agreement.<sup>13</sup> In the past, collective agreements in Slovenia generally provided that the trade union which called a strike was obliged to organise the action in accordance with its **strike rules**.

The existence of such rules in a legal system in which the right to strike is deemed a constitutional right of individual workers (regardless of whether they are organised collectively by a trade union) was considered disputable.<sup>14</sup> As a result, new collective agreements stipulate that trade unions which announce a strike must do so in accordance with the law.

Therefore, all requirements imposed by strike rules have been systematically excluded from collective agreements, given that they are applicable as standard to unionised workers. In accordance with the Constitution, a group of workers who are not unionised may also call a strike. In the light of the principle of equality under the Constitution and the law, the strike rules have been repealed. A strike must be in accordance with the law, regardless of who organises it.

## **2. Who has the right to call a strike?**

According to the Strike Act, strikes may be called by a trade union (i.e. its representative body) operating at the level of the employer or organised at other levels (e.g. industry level) or at the level of the highest body of trade union organisations such as federations and confederations (in the case of a general strike in the country), or it may be called by the majority (of a larger group of employees bound by the same interests) of the workforce concerned (e.g. at plant or enterprise level).<sup>15</sup> In practice, strikes are, as a rule, called by trade unions.<sup>16</sup>

### 3. Definition of strike

The **Strike Act** does not expressly guarantee any specific type of strike. There are no explicit legal provisions on, for example, solidarity/secondary/sympathy action, warning strikes, sit-ins, go-slow action, rotating strikes, work-to-rule action, picketing, blockades, etc. A purely political strike is unlawful.<sup>17</sup>

Some judges have maintained that the statutory definition of strike refers only to the usual stoppage of work and does not cover any of the new forms of strike such as **go-slows** or **work-to-rule** that have emerged recently.<sup>18</sup> There have been reports, for example, of customs officers staging a strike by performing their work more meticulously, or policemen going on strike by working only to the extent laid down by law.<sup>19</sup> Recent case law shows that, despite the narrow legal definition of a strike, in practice, forms of strike action such as solidarity, warning, go-slow, rotating and work-to-rule strikes are legally recognised in Slovenia.

Certain forms of collective action have developed in practice and become a subject of discussion in academic circles,<sup>20</sup> despite the fact that the case law of Slovenian courts is not very extensive in this respect:

- **Solidarity strikes** are, at least indirectly, permitted under the Strike Act, as the definition of a strike set out in the Act does not require that the strike action be directed at the employer;
- According to the prevailing view, the non-violent occupation of work posts should be treated as a legal strike;
- Any act, including **picketing**, that prevents anyone who has decided not to take part in a strike from working is illegal;
- As held by the Supreme Court, a unilateral decision to ‘freeze’ a strike for a given period, during which the employer is supposed to fulfil the relevant requirements, is not in accordance with the Strike Act;
- The legal literature supports the view that strikes which are aimed at issues that are subject only to management prerogatives are illegal.

#### 4. Who may participate in a strike?

According to the **Constitution** and the **Strike Act**, each individual worker is free to decide whether or not to participate in a strike.<sup>21</sup> This constitutional right may not be restricted to the organiser of the strike and the potential existence or non-existence of its membership. Thus, it is considered irrelevant who is responsible for calling a strike (i.e. the workers themselves or a trade union).<sup>22</sup>

##### **Limitations to the right to strike**

According to the Constitution, the right to strike may be restricted where required by the **public interest**, with due consideration given to the type and nature of the activity involved.<sup>23</sup>

Strike action in certain sectors may be forbidden (for example the right to strike of military personnel as described below). The Strike Act and other ‘special’ acts (acts covering a specific sector or activity) provide for limitations to the right to strike, mostly in the form of procedural requirements regarding the exercise of the right to strike.

These acts do not define the term ‘public interest’ and do not draw a distinction between civil services and essential services.<sup>24</sup> One of the reasons for this is that the law has been in force without any amendments since 1990, despite there having been significant changes in society.

The notion of ‘**activities of special public importance**’ is being used (see below). The provision of minimum services is a requirement of practically all ‘special’ acts. Legal opinion supports the view that the extent to which workers are affected by the limitations to the right to strike is too great.<sup>25</sup>

##### **Public sector in general**

According to the Law on Public Employees/Civil Servants Act, civil servants have the right to strike.<sup>26</sup> The Law on Public Employees states that the mode of exercising this right and the limitations on strikes in order to protect the public interest are determined by a separate law (Employment Relationships Act, ERA-1<sup>27</sup>).<sup>28</sup> Organising or participating in a strike under the conditions laid down by this law:

- does not involve a violation of an employee’s ‘work obligation’;
- may not constitute grounds for beginning the procedure to assess the disciplinary and financial responsibility of a worker and;
- may not lead to a worker being given a notice of dismissal.<sup>29</sup>

Under the existing strike legislation, the minimum service requirement applies to all public officials, providing that the duties that must be carried out during the strike are defined in general regulations or a collective agreement (in cases where a special law limits the right to strike). Article 19 of the Strike Act makes failure to comply with these requirements an offence, punishable by a fine.<sup>30</sup> However, treating all workers in the civil service as a uniform category has been criticised by some scholars as not fully taking into account the constitutional concept of the right to strike (and its possible limitations).<sup>31</sup>

In Slovenia, the public sector encompasses public administration, most public health services, all levels of education, the police and armed forces, customs, tax administration and pharmaceutical services. However, railway transport does not count as public sector, nor do waste collection services or electricity and water providers, even though they provide public services.

### **Activities of special public importance**

The right to strike of workers in organisations which perform activities of special public importance and in organisations which are of special importance for military defence may be exercised only under the condition that they ensure:<sup>32</sup>

- provision of a minimum level of work which ensures the security of people and property, or is an irreplaceable condition for the life and work of citizens or the functioning of other organisations and;
- performance of Slovenia's international duties.

The work and duties which have to be ensured are determined by a general legal instrument or by collective agreement.<sup>33</sup>

Notice of a strike in activities of special public importance must be given to:<sup>34</sup>

- the management body of the employing organisation or the employer;
- the appropriate trade union if the union is not the organiser of the strike;
- the competent body of the socio-political community (nowadays, the terms 'state' and 'local community' are used instead).

The strike must be announced at least 10 days before it is due to start by submitting the strike decision, strike demands and a statement on how the minimum level of work is to be ensured.<sup>35</sup>

The parties to the dispute – the bodies to which notice of the strike was given and the strike committee – must put forward proposals for resolving the dispute and inform both the workers involved and the general public about these proposals. The proposals must be presented during the period between the declaration of the strike and the day that it is due to begin.<sup>36</sup>

For example, the right to strike in the **military** and **police forces** is exercised under the conditions laid down by specific laws. The Defence Act prohibits strikes by military personnel while they are on duty.<sup>37</sup> Employees engaged in administration in the field of defence and enlisted military personnel must ensure the minimum level of service required by law, but their right to strike is suspended if there is an increased risk of an attack against the state or if there is an immediate threat of war.<sup>38</sup>

Measures to ensure the **minimum service** required by law are provided for by the Police Act, Enforcement of Penal Sanctions Act, Health Services Act, Air Navigation Act, Customs Service Act and Railway Transport Act.<sup>39</sup> Regulations (decisions) may be adopted in order to regulate the performance of work during a strike (decisions of this kind have been adopted for the rail transport sector and veterinary services).<sup>40</sup> The Strike Act stipulates when minimum services must be assured. It is provided that collective agreements set out, in accordance with ‘special’ acts (acts covering a special sector or activity), the conditions of work and tasks to be performed and the manner in which they are to be performed during a strike.<sup>41</sup>

‘Essential services’ in the strict sense of the term have been defined by the ILO as those services ‘the interruption of which would endanger the life, personal safety or health of the whole or part of the population’.<sup>42</sup>

## 5. Procedural requirements

- Mechanisms to resolve collective disputes are provided for in collective agreements. However, there are no data on their use.<sup>43</sup>
- The decision to call a strike must be adopted by a majority<sup>44</sup> of the workers in consultation with the employer (where there is no trade union organisation operating in the workplace), by the trade union leadership at the level of a department/activity or at company level, or by the leadership of a national organisation of trade unions;<sup>45</sup> this decision must specify the workers' demands, the starting time and date and the location of the strike, as well as information on the composition of the strike committee.<sup>46</sup>
- The strike committee must give prior notice of any strike action of at least 5 days in the private sector, 7 days in public administration and 10 days in activities of special importance for society or the state such as health care, the police, criminal prosecution, customs, transport and the military.<sup>47</sup>
- The strike committee and the representatives of the bodies to which notice of the strike was given must make every effort, from the day the strike is announced and for the duration of the strike, to settle the dispute by agreement.<sup>48</sup>
- The provision of minimum services (see above).
- The freedom to work must be ensured for non-strikers.<sup>49</sup>
- A strike must be organised and carried out in such a manner as to safeguard people's health and safety and ensure the protection of property, as well as to enable the continuation of work after the strike has ended.<sup>50</sup>
- A strike may end with an agreement between the parties to the dispute or by a decision of the party responsible for taking the strike decision.<sup>51</sup>
- There is no **peace obligation** in Slovenia. A relative or absolute peace obligation would be a violation of the constitutional system of Slovenia, where the right to strike is the individual right of workers.<sup>52</sup>

## 6. Legal consequences of participating in a strike

### Participation in a lawful strike

- According to the **Strike Act**, participation in a lawful strike does not constitute a violation of work obligations and may not serve as a basis for the introduction of disciplinary procedures or of the procedure for assessing workers' liability for damages.<sup>53</sup> Under the **Employment Relationships Act**, participation in a lawful strike is not a valid ground for termination of the employment contract by the employer.<sup>54</sup>  
In the event of unlawful termination of an employment contract in the context of a lawful strike, the employee concerned is entitled to initiate proceedings with the competent court, resulting in his or her reinstatement.<sup>55</sup> In the event that a worker does not wish to be reinstated or the court decides that the continuation of the employment relationship would no longer be possible, the worker is entitled to receive compensation.<sup>56</sup>
- Workers participating in a strike maintain their basic rights deriving from the employment relationship, with the exception of the right to remuneration. They also retain their rights to pension and disability insurance in accordance with the relevant regulations. Financial compensation during a strike may apply if this is foreseen under a collective agreement or general legal document.<sup>57</sup>
- Given that workers have the right to wage compensation for the duration of a legal strike *if so provided in a collective agreement*, there is very little call to use the strike funds set up by the trade unions. There have been some strikes of a longer duration where trade unions have paid striking workers a sum of money. In principle, trade unions with a small membership do not have strike funds in place, but this is not the case for the larger trade unions.<sup>58</sup>
- Neither the Constitution nor any other legislation permits employers to use a **lockout** as an instrument in the negotiating process or during a strike.<sup>59</sup> The employer may not employ alternative workers to replace those on strike.<sup>60</sup>

### Participation in an unlawful strike

- Workers who organise an illegal strike may be held liable for any damage incurred as a result of the strike, but only if all conditions of liability for damages have been met. Disciplinary measures, such as an admonition or other sanctions such as a fine, may also be imposed.<sup>61</sup>

- A trade union may be held liable for any damage incurred due to an illegal strike, but it may not be sanctioned by means of a penalty (fine) imposed in relation to such a strike. The organisation of an illegal strike does not constitute grounds for revocation of other trade union rights.<sup>62</sup>
- The consequence of an illegal strike is not the termination of the employment contract in summary proceedings but the potential termination of the employment contract in regular proceedings, provided that all the conditions for the termination of the employment contract have been satisfied.<sup>63</sup>

## 7. Case law of international/European bodies on standing violations

### International Labour Organisation

- No decision has been taken by the **Committee of Freedom of Association** (CFA) in respect of Slovenia to this date;<sup>64</sup>
- There are no recent comments of the **Committee of Experts on the Application of Conventions and Recommendations** (CEACR) relevant for the right to strike. In previous direct requests on the application of ILO Convention No. 87, the CEACR had requested information on any progress made in respect of the adoption by Slovenia of new legislation regulating strikes.<sup>65</sup>

### (Revised) European Social Charter

#### Collective complaints under Article 6(4) of the European Social Charter

To date, no complaint in respect of Article 6(4) of the Charter has been submitted to the ECSR.<sup>66</sup>

#### Conclusions on Article 6(4) of the European Committee of Social Rights (ECSR)

In its Conclusions 2018, the ECSR noted that the report provided updated information on the rules applicable to strike action in certain sectors such as the administration of justice, defence, police, health care, prison service, financial administration services, veterinary services and search and rescue services. The Committee noted that the sectors in which the right to strike may be restricted are fairly extensive and asked the next report to demonstrate that the restrictions satisfy the conditions laid down in Article G of the Charter.

The ECSR referred to its general question regarding the right of members of the police to strike.

The ECSR recalled that a minimum service is imposed in the event of a strike in these sectors. Specific legislation for each sector lays down the general minimum requirements that must be observed during a strike. The ECSR asked how in practice the minimum service requirements are agreed; whether when establishing a minimum service to be provided during a strike, workers (and or their organisations) are involved on an equal footing with employers regarding the nature or degree of the minimum service to be provided. It notes that as regards the legislation on the minimum services to be provided in the financial administration services of the state seem to permit a senior official to make a final decision if no agreement can be made with the strike committee. The ECSR sought clarification of the situation.<sup>67</sup>

## 8. Bibliography

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- Bardutzky, Samo; Zagorc, Saša: *Slovenia: Second Wave of Challenges to Constitutionalism*, *VerfBlog*, 19 March 2021, available at: <https://verfassungsblog.de/slovenia-second-wave-of-challenges-to-constitutionalism/>.

## Notes

- 1 Status of ratification by Slovenia of UN instruments: <https://treaties.un.org/Pages/ParticipationStatus.aspx?clang=en> (accessed on 3 April 2021).
- 2 Status of ratification by Slovenia of ILO conventions: [http://www.ilo.org/dyn/normlex/en/f?p=1000:11200:0::NO:11200:P11200\\_COUNTRY\\_ID:103533](http://www.ilo.org/dyn/normlex/en/f?p=1000:11200:0::NO:11200:P11200_COUNTRY_ID:103533) (accessed 3 April 2021).
- 3 ILO Recommendations No. 159 and No. 163 are also relevant to labour relations in the public sector; see Clauwaert, S. and Warneck, W. (2008), *Better defending and promoting trade union rights in the public sector. Part I: Summary of available tools and action points*, Report 105, Brussels: ETUI, Annex 3, pp. 87-91.
- 4 Status of ratifications of the Revised European Social Charter: [https://www.coe.int/en/web/conventions/full-list/-/conventions/treaty/163/signatures?p\\_auth=jPYjkVEL](https://www.coe.int/en/web/conventions/full-list/-/conventions/treaty/163/signatures?p_auth=jPYjkVEL) (accessed on 3 April 2021).
- 5 Slovenia has accepted the Protocol by a declaration made in application of Article D paragraph 2 of Part IV of the Revised European Social Charter. See the status of ratification of the Additional Protocol to the European Social Charter Providing for a System of Collective Complaints, available at: [http://www.coe.int/en/web/conventions/full-list/-/conventions/treaty/158/signatures?p\\_auth=102WXSxN](http://www.coe.int/en/web/conventions/full-list/-/conventions/treaty/158/signatures?p_auth=102WXSxN) (accessed 3 April 2021).
- 6 Status of ECHR ratifications: [https://www.coe.int/en/web/conventions/full-list/-/conventions/treaty/005/signatures?p\\_auth=jPYjkVEL](https://www.coe.int/en/web/conventions/full-list/-/conventions/treaty/005/signatures?p_auth=jPYjkVEL) (accessed on 3 April 2021).
- 7 The Constitution of the Republic of Slovenia was adopted on 23 December 1991.
- 8 Warneck, W. (2007), *Strike rules in the EU27 and beyond: A comparative overview*, Report 103, Brussels: ETUI-REHS, p. 66.
- 9 Waas, B. (ed.), 'The Right to Strike. A Comparative View', 2014, p. 468.
- 10 *Idem*, p. 468.
- 11 Official Gazette of the Republic of Slovenia Nos 22/1991 and 66/1993. The Strike Act has been adopted in the former Yugoslavia. In 1991, the Slovenian Parliament decided to apply it temporarily on the territory of Slovenia, pending the adoption of a new act. No such act has so far been adopted (see Waas, B., p. 467).
- 12 Waas, B., p. 471.
- 13 ETUI Report 103, p. 66; see also Waas, B., p. 469.
- 14 Waas, B., p. 469.
- 15 ETUI Report 103, p. 66; see also Waas, B., pp. 469-470.
- 16 Waas, B., p. 470.
- 17 ETUI Report 103, p. 66.
- 18 Waas, B., pp. 467 and 472.
- 19 *Idem*, p. 467.
- 20 Waas, B., p. 473.
- 21 ETUI Report 103, p. 66.
- 22 Waas, B., p. 470.
- 23 ETUI Report 103, p. 66.
- 24 Waas, B., p. 472.
- 25 *Idem*.
- 26 ETUI Report 103, p. 67; see also Waas, B., p. 469.
- 27 Employment Relationships Act (ERA-1, 2013), which also applies to civil servants in this respect.
- 28 ETUI Report 103, p. 67.
- 29 Eurofound, 'Strike legislation and trends examined', published on 27 November 2002, available at: <https://www.eurofound.europa.eu/observatories/eurwork/articles/strike-legislation-and-trends-examined>.
- 30 ECSR, Conclusions 2004, Article 6(4) Slovenia.
- 31 Waas, B., p. 472.
- 32 ETUI Report 103, p. 66.
- 33 *Idem*.
- 34 ETUI Report 103, p. 67.
- 35 Eurofound Report, 2002.
- 36 ETUI Report 103, p. 67.
- 37 *Idem*.
- 38 Waas, B., p. 468.
- 39 *Idem*.
- 40 Waas, B., p. 469.
- 41 *Idem*.
- 42 Compilation of decisions of the Committee on Freedom of Association (ILO CFA), 6th edition, 2018, Chapter 10, paras. 836 - 841 – ILO CFA has defined and listed as “essential services in the strict sense of the term” where the right to strike may be subject to restrictions or even prohibitions, the following: the hospital sector, electricity services, water supply services, the telephone service, the police and armed forces, the fire-fighting services, public or private prison services, the provision of food

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to pupils of school age and the cleaning of schools, air traffic control. The ILO CFA has stressed that compensatory guarantees should be provided to workers in the event of prohibition of strikes in essential services, see paras. 853 - 863; See also Clauwaert, S. and Warneck, W. (2008) *Better defending and promoting trade union rights in the public sector. Part I: Summary of available tools and action points*, Report 105, Brussels: ETUI, pp. 79-81.

43 Eurofound, 'Living and working in Slovenia', Industrial action and disputes, 16 March 2021, available at: <https://www.eurofound.europa.eu/country/slovenia#industrial-action-and-disputes>.

44 Of a larger group of employees bound by the same interests.

45 Waas, B., p. 470.

46 ETUI Report 103, 2007, p. 66.

47 Waas, B., p. 470.

48 Waas, B., p. 470; see also Eurofound, 2002.

49 Waas, B., p. 471; see also Eurofound, 2002.

50 ETUI Report 103, p. 66.

51 *Idem*.

52 Waas, B., p. 471.

53 Waas, B., p. 473; see also ETUI Report 103, p. 67.

54 Waas, B., p. 469; see also ETUI Report 103, p. 67.

55 ECSR, Conclusions 2006, Article 6(4) Slovenia.

56 ECSR, Conclusions 2010, Article 6(4) Slovenia.

57 Eurofound, 'Living and working in Slovenia', Industrial action and disputes, 16 March 2021, available at: <https://www.eurofound.europa.eu/country/slovenia#industrial-action-and-disputes>.

58 Waas, B., p. 476.

59 Eurofound, 2002.

60 ETUI Report 103, p. 67.

61 Waas, B., p. 474.

62 *Idem*.

63 *Idem*.

64 Until 3 April 2021; The Committee of Freedom of Association (CFA) has developed general principles on the right to strike in the public sector. See Compilation of decisions of the Committee on Freedom of Association (ILO CFA), 6th edition, 2018, Chapter 10, paras. 836 - 841 – ILO CFA has defined and listed as “*essential services in the strict sense of the term*” where the right to strike may be subject to restrictions or even prohibitions, the following: the hospital sector, electricity services, water supply services, the telephone service, the police and armed forces, the fire-fighting services, public or private prison services, the provision of food to pupils of school age and the cleaning of schools, air traffic control. The ILO CFA has stressed that compensatory guarantees should be provided to workers in the event of prohibition of strikes in essential services, see paras. 853 - 863; See also Clauwaert, S. and Warneck, W. (2008) *Better defending and promoting trade union rights in the public sector. Part I: Summary of available tools and action points*, Report 105, Brussels: ETUI, pp. 79-81.

65 See, for example, Direct Request (CEACR) – adopted 1996, published 85th ILC session (1997) in which the CEACR noted the Government's statement that a new Act on Strikes was under preparation. The CEACR requested a copy of the draft law on strike in its Direct Requests adopted in 2001, 2002 and 2004. In its Direct Request (CEACR) – adopted 2006, published 96th ILC session (2007), the CEACR requested the Government to indicate whether the adoption of new legislation regulating strikes (whereby it would also be possible for the social partners themselves to decide on strike rules) was still envisaged. Available at: [https://www.ilo.org/dyn/normlex/en/f?p=1000:13100:0::NO:13100:P13100\\_COMMENT\\_ID,P11110\\_COUNTRY\\_ID,P11110\\_COUNTRY\\_NAME,P11110\\_COMMENT\\_YEAR:2275885,103533,Slovenia,2006](https://www.ilo.org/dyn/normlex/en/f?p=1000:13100:0::NO:13100:P13100_COMMENT_ID,P11110_COUNTRY_ID,P11110_COUNTRY_NAME,P11110_COMMENT_YEAR:2275885,103533,Slovenia,2006) .

66 Until 3 April 2021, see ESC, Country profile: Slovenia, available at: <https://www.coe.int/en/web/european-social-charter/slovenia>.

67 ECSR, Conclusions 2018 on Article 6(4), Slovenia, available at: <http://hudoc.esc.coe.int/eng?i=2018/def/SVN/6/4/EN> .