

Interrogating Labour Strike in the Contemporary Nigerian Industrial Relations System: The Right and Limitations in Focus

Longe, Olukayode. (PhD)

Department of Management and Accounting, Lead City University, Ibadan, Oyo State, Nigeria

DOI: <https://doi.org/10.56293/IJMSSSR.2025.5538>

IJMSSSR 2025

VOLUME 7

ISSUE 2 MARCH – APRIL

ISSN: 2582 – 0265

Abstract: This paper interrogates the issue of labour strike in the Nigerian industrial relations system. Central to the discourse are the accentuated matters of the right to strike and its limitations. From the extant literature, these duo components of industrial relations have customarily been objects of contestation and curtailment attempt from government and other employers of labour. This raises some pertinent questions, which are: Is incessant labour strike good for any industrial relations system? What is right to strike? and does it exist in Nigeria? and Is there any limitation on the right to strike in the country? or Is this limitation in conformity with the global principle?

The answer to these questions constitutes the focus of the paper. No doubt, labour strike is worker's right and a notable lubricant of the industrial relations system, It is a powerful tool in the hand of labour to assert their right, but it is a costly equilibrating mechanism, not good for any industrial relations system. The right to strike subsists within the Nigerian industrial relations system and endows labour with power to express their dissatisfaction, but guided by the framework of labour law and regulations. The paper unfolds that both the procedural and substantive limitations, imposed on the right to strike in Nigeria are in tandem with the global principle, but still need to satisfy the test of reasonableness. It recommends that industrial relations needs to be humanised and a better attitude of the state and other employers towards employees must be cultivated in order to reduce excessive industrial actions, foster peaceful co-existence and ensure amity between labour and management in Nigerian work organisations

Keywords: Labour strike, Industrial relations, Right of strike and Limitation

1.0 Introduction

In recent decades, the Nigerian industrial relations system has been characterised by intense conflicting relationship rather than harmonious and cooperative labour management relations. This development has culminated in numerous and incessant labour strikes in Nigerian workplaces, most especially in the public sector. According to Bamidele (2020), virtually all the sectors of the Nigerian economy has witnessed one form of industrial action or the other. The International Centre for Investigative Reporting (2021) showed an utmost concern for the precariousness of this use or abuse of strike action in Nigeria when it documented that, incessant strikes by doctors and health workers, resulted in loss of about 300 working days between 2013 and 2021. Similarly, Kazeem (2022) affirmed that the Academic Staff Union of University (ASUU) also in Nigeria has spent one (1) in every four (4) days on strike in the last six (6) years. Even the essential services where there is prohibition of strike have also embarked on industrial action and most of these labour strikes are increasing violations of certain basic labour legislation restrictions in the country.

Looking back, incessant strikes have been an historical problem in Nigeria (Agbakwuru, 2021) and the pattern of this strike has been cyclical and counterproductive in form. Although, there is no nation in both developed and developing nations alike without strike history, but currently labour strikes are now at the extreme in Nigeria. The proclivity of this anathema of strike action is attributed to the consequential factor of the right to strike. It is one of the numerous rights which the workers are entitled to and it is pivotal to the instrumentality of any workers union (Zanath, 2024). This right provides workers with the freedom to embark on strike in any democratic

nation, as it is recognized as a redistribution of power resource and necessity for workers bargaining condition in organised work places. As such, the right to strike brings pressure on the employers to listen to employees' demands (Grayathri & Rhuvisha, 2023) and it is a legal right of labour to controvert employers' arbitrary power. Without it, labour unions and workers lack any strength to defend their positions against the economic and political power of employers (Garcia & Andres, 2017). Thus, the right to strike endows labour with power to express their dissatisfaction and to reverse partly or fully any unfavourable situations which may have become unbearable for them to cope with for one reason or the other in workplaces.

Nowadays in Nigeria, labour strike has no doubt literally become a certainty of industrial life. Its essence has been to take a force stand against management, when collective bargaining has not yielded desired result in resolving workers demand of interest. In this manner, strike action is presently regarded as a legitimate weapon for employees in projecting their demands (Archie, 2019). Though, it has been creating some tensions and anxieties, it is not that its dark cloud does not have some silver linings in work places. With the dismantling of communism in Eastern European blocs, where strike actions were initially outlawed, and the emergence of trade unions as an autonomous body, rather than an apparatus of state in these nations, labour strike has now become a notable lubricant of the global industrial relations system. In effect, it is basically a crucial instrument in the fight against domination and arbitrary power of management (Gourevitch, 2018) and a weapon in the armoury of the middle class to fight collectively and pressurize employers (Malegaonkar, 2019). Besides, labour strike goes far beyond exclusively wage issue, to involve equity and reform at work. In Nigeria, it is presently used by the trade unions as both an instrument of advocacy and system for advancing workers right, challenging negative government policy and even positively influencing employers' role in corporate governance.

More importantly, labour strike is labour's right and most potent force for achieving a better condition of service (Anyogu & Wosu, 2023). The question however to ask is, whether excessive labour strike is good for any industrial relations system. Strike can be an equilibrium factor in industrial relations and workers strategy for agitating for better working condition, but Abdulkareem (2019) proffered that excessive labour strike is not good for any industrial relations system. Viewed seriously, labour strike is a costly equilibrating mechanism and an outcome of an unstable workplace relationship especially on matters in which there are disagreements and which majority of workers are dissatisfied. It is an artificial and non-optimal behaviour in industrial relations. It is also usually one aspect of industrial relations that involves the most negative commentary (Shimawa, 2020). As such, labour strike is a hard dent on the industrial relations system and serious collapse of the grievance system in work-organisations. For these reasons, Addisson & Teixeira (2019) opined that strike action is a reflection of the extent to which work institutions are unable to generate favourable climate of employee management relations or trust, which may in turn adversely impact on plant level productivity and financial performance. It negatively affects investors' confidence and subsequently investors' return (Manugwa & Ferreira, 2021). As an end product of incongruity in relationship between labour and management on grievance issues, it is a heedless drain of the use of power resource.

However, according to Odeku (2014) trade unions and workers do not just embark on strike action, even if it is their right to do so, but unresolved industrial disputes usually trigger strike actions. Ideally in every country, there are labour legislations which have core concern for social justice to ensure fair employment practices and proper functioning of the nation's industrial relations system. In Nigeria, the promulgation of the Trade Dispute Act of 1976 as amended in 1977, 1997, and 2004. for settlement of industrial disputes presupposes the inevitability of conflict in work-relations. This Act is indispensable for effective conflict prevention and resolution which is germane to cordial relations between labour and management, in order to maintain and keep their institutional identities and resolve their disagreement promptly without resorting to strike actions. The non-recognition of the sanctity of collective agreement by government and the recalcitrant attitude of some management to the spectrum of labour problems have potentially been responsible for the incessant labour strikes most especially in the Nigerian public sector organisation. In this connection, it is apposite again to ask why should any employer of labour take with levity employees' dispute of interests and rights, until they become disgruntled and discontented or rather, why should any government fail to honour a binding contract and sanctity of collective agreement signed with their employees?

Thus, it is not surprising when Adediran (2021) reiterated that it is of common knowledge, that the language government understand best in Nigeria is strike. This suggestively is the import of this study. The accentuated

issues in the Nigeria industrial system are the matters of the right to strike and its limitations. Any country's industrial relations system should aim to control and protect established job values, employment relationship and procedural rules governing employment relationship for the achievement of industrial peace and tranquillity. The harmony of the workplace or organisation can create a comfortable work atmosphere (Fadillah, Nur & Siti, 2022). With the incessant resurgence of labour strike in the Nigerian industrial relations system, it is pertinent to ask some logical questions: does the right to strike has any limitation in Nigeria and is this limitation in conformity with the global principle and practice? The answers to these questions are confined to constitute the icing of our discourse, and focus of this paper. It is however necessary to first locate, what is labour strike, which in turn will lead us to the issue of the right to strike and its limitation. In conclusion, the paper proffers ways to stem the tide of incessant labour strike in order to ensure cordial industrial relations in Nigeria.

2.0 What is Labour Strike?

There appears to be no exact definition of the term labour strike (Giame, Awhefeala & Edu, 2020). It is an unsettled concept in industrial relations. Even the legal concept of strike varies from nation to nation, as no country's laws on strike are alike (Waas, 2012) and many jurisdictions do not legally define strike action explicitly (Waas, 2014). However, the general normative idea underlying the concept of strike is that, it is a temporary work stoppage or withdrawal of labour services. It is the most recognisable and publicised aspect of workplace disputes (Kazeem, 2022). Put in the simplest form, Nkanu, Otu & Utu-Baku (2023) stated that labour strike is a refusal to work as a protest. This definition implies that as a part of organisational life, labour strike is a key protest that workers can embark upon to assert their demands. Within this perspective, most strikes are simply initiated by labour unions to bring pressure on management to compel, previously unthinkable demand to become acceptable. From all indications, labour strike can be said to be a deliberate and concerted temporary withdrawal of work or services purposefully deployed to force management to accept a particular goal of workers. It is a powerful weapon in the hands of labour union and signifies a strategic response to unfavourable situations that can affect both the labour and management in the work place

Accordingly, Manugwa & Feirreira (2021) described labour strike as a platform that enables workers to demonstrate their disagreement and or their dissatisfaction towards their employers concerning labour relations issues such as remuneration, working conditions and employee benefits. By its nature, it is an assembled and combined action constructed by the organised labour as a matter of last resort in pursuit of their grievances, especially in a country, where the system of industrial relations is hinged on the constituent of free and fair collective bargaining. Within this context, Igbokwe (2021) referred to labour strike as a weapon that is ultimate and often potentially available to collectivity of employees, when collective bargaining breaks down in organisations. This view suggests that labour strike is a collective expression of the voice of labour on temporary work stoppage by withdrawing their services from the work situation which allows them to retain their dignity and still extract concession from management during negotiation. In essence, labour strike can be understood as the refusal of workers to work, which occurs as a response to employee's grievances (Ayuba, Dang, & Nvan, 2020, and Nwanze & Akudu, 2021).

The Nigerian Labour Congress (2001) which is the central body of labour unions in the country, defined labour strike as collective withdrawal of labour by trade unions in search of, among others, better conditions of work for their members. Also, from the general opinion of some trade unions, the phenomenon of strike action is simply referred to as a method of bargaining. This makes labour strike to be seen as a bargaining tactics and deadlock breaking strategy, employed by workers in the event of total impasse, when collective bargaining fails to yield the desired results during negotiation in organisations. Suggestively as such, labour strike is usually perceived as one of the legitimate as well as potent instrument which strengthens the workers' bargaining power to deal with management on equal footing (Nwoko, 2014). Thus, labour strike is best typified as the driving force of union's power and sanction to redress perceived workers' injustice and repression in the work place. By and large, it is the right to strike that gives the freedom to workers to embark on strike, but what is right to strike and does this right subsist in the Nigerian industrial relations?

3.0 The Right to Strike

The right to strike is an off-shoot of human right. It is one of the essential means available to workers for the promotion of their economic and social interest (Anyagou & Wosu, 2023). It is also a globally accepted right

(Grayathri&Bhuvisha, 2023) and a right to resist oppression from the owners of capital (Gourevitch, 2018). As such, no nation can lay claim to democracy as the right to strike is a basic gauge of the democratic value of any country. Also, embedded in the notion of the right, is that, it is the most significant international labour standard for the practice of industrial relations. For this reason, the right to strike endows workers with the economic sanction of superior bargaining power to drive fair and effective negotiation. Any curtailment of this right involves the risk of weakening the basis of collective bargaining in organised workplaces. Indeed, the right to strike has now become a fundamental right recognised by a large majority of countries around the world as embodied in the United Nations International Convention on Economic, Social and Cultural rights of 1966 (Giame, Awhefeala & Edu, 2020). The right at the same time is recognised under the various regional human rights instruments (Otuturu, 2021) and has been given a vast protection under the international law.

According to Obiekwu&Obibhunnum (2019), the right to strike has been provided for by different countries in various ways in order to bring about an enduring industrial harmony and national development. Today, the right is indeed a pivotal aspect of the freedom of association of workers under the International Labour Organisation (ILO). As such, ILO did not think that the right to strike does not exist (Brudney, 2021), despite its non-textual recognition by the body. In this manner, it is not a vague right, but a right that is germane to the enthronement of social justice for workers, not to be subjected to slavery and non-decent work in organisations. With its cathartic effect in industrial relations, the right to strike has become a background necessity to safeguard labour unions and their members from risks and also strengthen their capacity to deal with management on equal footing during negotiation process. In other words, the right to strike is a right that is generally perceived as a means of achieving union's collective interest (Arinze-Umobi& Arinze Omobi, 2022). It is the key stone of contemporary industrial society, providing trade unions and their members with the ability to promote their socio-economic interests and welfare issues in the workplace.

As a result, the right to strike is an important development as both the history and practice of industrial relations supported its existence (Brudney, 2021). This, makes it to occupy a strategic position in the collective bargaining paradigms of organised work places. In effect, the right to strike is a right to restore inequality and lack of parity of power which stems from an unjust social order in an industrial relations system. Extending this, Gourevitch (2016) argued that the right to strike is a right that workers claim to refuse to perform work, they have agreed to do, while retaining a right to a job. Against these logical facts, there is however the apparent apprehension that in global industrial relations, the right is far from being a categorical right. The International right to strike is far from absolute (Brudney, 2021). It is devoid of structured or fixed code of operation as the right varies in approach, from one country to another, depending on the nations' industrial relations reality. The right can be restricted or even prohibited in pursuant to national interest as its finale is adjustable.

Retrospectively, up to 1968 in Nigeria, there was undoubtedly an absolute and total right to strike, because there was no law prohibiting strike in the country. The outbreak of the civil war in the country in 1968 changed the industrial relations posture of the government, which led to the promulgation of the Trade Dispute Emergency decree of 1968, which banned labour strike and lock-out. The ban continued with the Emergency Provision Amendment No. 2 Decree of 1969, which introduced tougher criminal penalty of five years imprisonment, without an option of fine for its breach. The two emergency decrees were abrogated in 1976 by the Trade Dispute Decree and as amended in 2005, with the right to strike restored, but with some legal limitations, which do not confer an absolute right on the Nigerian workers to go on strike. As reiterated by Anyogu&Wosu (2023), there is no positive constitutional or statutory provision guaranteeing the right to strike in Nigeria. This is not to suggest that the right to strike in the country is never a recognised labour right, but it is subject to special legal framework and condition.

The International Labour Organisation (ILO) labour update on Nigeria (2021) also emphasised that there is no provision in the country's legislation on the right to strike. What the Nigerian workers enjoy is limited right, which is more like an ordinary freedom and abridgeable in the face of the law. Unlike in countries which have systematic code of operation, with full constitutional backing such as France, Italy, Hungary, Germany and even South Africa, the right to strike in those countries is categorical and non-relative. As a matter of fact, in Nigeria, the Trade Union Act of 2005 as amended in Section 18 (1) prohibited any form of strike action in connection with any trade dispute except the required procedures of the law are complied with. In other words, being a legal inhibition, that section appears to have erased whatever recognition that might have been conferred on the right

to strike in Nigeria. This notwithstanding, Nigerian workers still enjoy this right, as the right to strike exists within the country's industrial relations system except that it is regulated by labour law but constitutionally protected and also balanced with some legal limitations.

4.0 Limitations of Labour Strike

Labour strike like any other human rights has its own limitation. The restriction imposed may be procedural or substantive, but must both satisfy the test of reasonableness. In most countries, the desire to mitigate the nuisance value of industrial action, ensure smooth functioning of social order and secure industrial peace compels the need for such limitations. This makes the right to strike to be generally exercised subject to satisfying some laid down procedures (Arinze-Umobi & Arinze-Umobi, 2023). In Nigeria, both the procedural and substantive limitation emerged from the labour legislation in order to ensure proper functioning of societal obligations and safeguard the perils which industrial actions may likely impose on the consuming public. The pursuance of the legitimate right of the public and nations' interest for strikes not to create unnecessary discomfort for the general public necessitates the two limitations. Thus, the statutes of limitations are ubiquitous (Philip & Ajala, 2017) and in most countries, not only in Nigeria.

4.1 Procedural Limitation

In Nigeria, the procedural limitation of strike is guided by the framework of labour legislations and regulations. This framework strives to balance the right of the labour with the general exigencies of the public. As such, the procedural limitation involves the series of steps to be followed and complied with, prior to the construction of strike actions in the country. According to Akpodiete and Ogbonda (2023), the basic processes that must be adhered to before workers can embark on strike action in Nigeria include:

- Proper notification of the intention to go on strike.
- Exhaustion of the provision of mediation, conciliation and arbitration processes
- Approval from relevant trade union bodies and
- Consideration regarding essential services and public interest.

Even though, the law has accorded the labour unions to go on strike, it also provides the procedures, which set the limitations before embarking on such action. Consequently, failure to act in accordance with the procedural guidelines can render labour strike illegal, and may lead to sanction and court interventions. Hence, labour strike in Nigeria still has a criminal colouration (Giame, Awhefela & Edu, 2020). As expected, the method adopted by labour to embark on strike action must not be contrary to public order. Any unilateral and unauthorised stoppage of work or service is tantamount to breach of employment contract. In other words, the procedural limitation of the right to strike is subsumed within the Nigerian industrial relations system ostensibly to protect and allow the ordinary populace to pursue their legitimate activities without any undue hinderance or obstruction. This, thus serves as prerequisite for moderating the reckless use or curtailing the unnecessary abuse of strike development in the country and for the nation's interest not to be put in jeopardy.

4.2 Substantive Limitation

The substantive limitation subsists within the gambit of the law to govern the scope and provide justification for labour disputes that can activate strike action. According to International Labour Organisation (2022), national legislation frequently lays down a number of conditions that must be met by workers and their organisations, before they can exercise the right to strike. The substantive limitation is purposefully put in place to ensure that strike actions are based on legitimate disputes as spelt out by the law which are related to labours' right. It is somewhat different from the procedural type, in that, it does not prescribe the process to be followed before the commencement of strike but adjudges the rationalisation for strike action. In Nigeria, the labour law specifically spells out issues of substantive limitation and emphasises grounds, under which labour strike is legally permissible or not. Issues that can trigger strike action must be related to the spectrum of employees' problems in the workplace, like wages and salaries, working conditions and terms of employment. In the face of substantive limitation, labour strike is not allowed or permitted for purely personal employee grievances. Relatedly, under the Nigerian labour law, trade union cannot engage in strike action for political reasons or as a result of any

government policies, unless such policies directly infringe on labour rights. Government also can elect to restrict or prohibit strike action in the essential services sector when matters of public welfare or interest are endangered.

In this regard, labour strike that violates the substantive limitation is considered as illegal and both the government and other employers of labour can seek legal redress to stop such strike action. This suggests that, strike action can only be justified, if it arises from disputes over employees working conditions or disputes of rights. Labour strike outside the scope of employment relationship is substantively unlawful. Also, union's demand outside the purview of employment terms and conditions is legally not justifiable by strike action. Unilateral labour strikes without going through the process of collective bargaining are illegal, since labour strike must be primarily in pursuit of workers' better condition of service and not for political interests. The government has the defacto and dejure right to declare any labour strike, which is deemed to threaten public safety, national interests and security as illegal, and when it is against the purview of the substantive limitation.

5.0 Conclusion and Recommendations

Labour strike is an industrial relations phenomenon and a contentious issue of organisational life. It is scored the lowest point in the management trajectory of industrial relations practice as an outcome of rigidity in behaviours and serious dents on labour management relations. The deployment of strike action by labour union is no doubt a mechanism to express grievance, enforce demand and seek redress to promote issues of interest, such as worker's welfare. By its nature, labour strike is a bargaining tool and deadlock breaking strategy deployed by the labour class to force the acceptance of their goals on management in organized workplaces. As such, strike action has become a significant arsenal in the armoury of the labour unions to foster worker's right and extract concessions from management. Although, it is now a ceremonial social crisis in Nigeria, this signals the need for active government intervention in the settlement of trade dispute in the country. The industrial actions by labour unions are nearing mounting state of anarchy most especially in the public sectors organisations in Nigeria.

In all fairness, both management and labour should not look upon themselves as too separate and distinct segment of an organisation. Conversely, they should see themselves as partners in an enterprise working together for corporate goal accomplishment. The 2 social actors have their rights in the Nigerian industrial relations system. Such rights are not nebulous, but however definable in the face of the labour law. Their legalities are also derivable of statute, legislation, collective bargaining and international convention. The right to strike exists within the context of the Nigerian industrial relations system, but it is regulated by law. In Nigeria, the right is not a constitutional specifying right, neither is it a positive nor absolute right, but subject to certain limitations based on the country's legislative framework and national economic interest. The right must however be made meaningful and the limitation imposed need to satisfy the test of reasonableness, Likewise, the enforcement of any limitation must not be high-handed and devoid of social justice.

Thus, it has become increasingly obvious that without industrial harmony and peaceful collaboration amongst the most active participants in the Nigerian industrial relation system, it will be almost impossible to put strike action in abeyance in the country. It is clear from the interrogation carried out, that in Nigeria, industrial relations need to be humanised and a better attitude of the state and other employers towards employees must be cultivated in order to stem the resurgence of strike actions in the country. Management and workers need a change in their philosophy and behaviour towards each other to reduce industrial conflict, foster peaceful coexistence and ensure amity in the work place. Government must improve social dialogue and ensure prompt responsiveness to workers dispute of rights and interests before they escalate and grow into strike action. The State as the biggest employer of labour must lead by examples, abhorring all unfair labour practices to bring about industrial harmony that is necessary to boost labour morale and commitment. Lastly, government intervention through the processes of mediation, conciliation and arbitration suggest that disputes settlement is often unduly prolonged in Nigeria, leading to labour frustration. Evolving, establishing and utilising a better alternative to offer speedy and prompt settlement of labour disputes in the best interest of national stability, social justice and industrial peace must be a core concern of all stakeholders.

References

1. Abdulkareem, S. (2019). ASUU Crisis Affecting Academic Staff and Students of Unilorin. Vanguard. April 26, 63858, 35.
2. Addison, J. & Teixeira, P. (2019). Strikes, Employee Workplace Representation Unionism and Trust. Evidence from Cross-Country Data. *Journal of Economics Behaviour and Organisations* 158(1): 109-133.
3. Adediran, A. (2021). The Nigerian Industrial Relations System: Challenges and Contradictions. Munich GRIN Verlag <https://www.grin.com> II document IIVII30835.
4. Agbakwuru, K (2021). Solution to Incessant Strikes and Non-Implementation of Collective Bargaining Agreement. A Nigerian Perspective. *International Journal of Advanced Academic Research*. 7(5): 1-12.
5. Akpodiete, O. & Ogbonda, E. (2023). Basic Provision of the Extent to Which the Right to go on Strike by Trade Unions in Nigeria is Absolute? *International Journal of Economics and Business Management*. 9(9): 1-13.
6. Anyogu, F. & Wosu, E. (2023). A Legal Appraisal of Employees Right to Strike in Nigeria. A Cross National Comparism. *African Journal of Law and Human Right* 7&2): 48 – 53.
7. Archie, P. (2019). Strike; Meaning, Definition and Type. <https://www.businessmanagement-humsnresource.com/management-strike-meaning/21155>.
8. Arinze-Umobi, C. & Arinze-Umobi, P. (2022). Medical Practitioner's Right to Embark on Strike in Nigeria vis avis the Sanctity of Human Life: Case Study of Kwara State University Teaching Hospital. *Journal of Refugee Law and International Criminal Justice* 1(1): 136 – 150.
9. Ayuba, K., Dang, M. and Nvan, R. (2020). An Assessment of the Impact of Strike Action on the Productivity Level of Academic Staff of Nigerian Public Universities. A Study of Plateau State University, Gboko. *Ajorms Journal*, 1(1), 2020: 1-18.
10. Bamidele, A. (2020). Industrial Action in Nigeria: Legality, Causes and Consequences. *Journal of Current Issues in Social Sciences*, 6(1): 1-8.
11. Brundney, J. (2021). The Right to Strike as Customary International Law. *Yale Journal of International Law*. 46 (1), 246-257.
12. Fadillah, I. Nur, H. & Siti, A. (2022). The Effect of Industrial Bah Harmony Towards Employee Performance and Organisational Citizenship Behaviour at Manufacturing Industry in Zohor Bah. *Research in Management of Technology and Business*. 3(1): 2232-247.
13. Garcia, L., & Andres, J. (2017). The Right to Strike as Fundamental Human Rights: Recognition and Limitation in International Law. *Revista Chilena De Derecho*, 44(3): 781-804.
14. Gayathri, M. & Bhuvisha, W. (2023). Right to Strike. *International Journal of Multi-Disciplinary Research*. 5(6) 1-11.
15. Giame, B. & Awhefeala, & Edu (2020). An Overview of the Right to Strike in Nigeria and Some Selected Jurisdiction. *Beijing Law Review*. 11(2): 464-486.
16. Gourevitch, A. (2018). The Right to Strike. A Radical View. *American Political Science Review*. 112(4): 905-917.
17. Gourevitch, A. (2016). QUITTING WORK, BUT NOT THE JOB. Liberty and the Right to Strike. *Perspective in Politics*. 14(2): 307 – 323.
18. Igbokwe, P. (2021). Introduction to Labour-Management Relations. *Global Journal of Management and Business Research*, 21(3): 31-38.
19. International Centre for Investigative Reporting (ICIR), 2022. Strike and Economy. How Nigeria Loss Nearly 300 days – The Nation, Nigeria.
20. International Labour Organisation (2021) – ILO. Industrial Relations Report in Nigeria. Legal Date Base on Industrial Relations. Geneva.
21. International Labour Organisation (2022). Substantive Provision of Labour Legislation. The Right to Strike. Industrial and Employment Relations Dept; Publication. ILO, Geneva.
22. Kazeem, K. (2022). Sixteen Years Record of ASUU Strikes in Nigeria. Chat of the Day. Dataphyte, 17/2/2022.
23. Malegaonkar, S. (2019). Types of Strike Regarding Industrial Disputes in India. *International Journal of Management and Humanities* 4(1), 2019: 7-10.
24. Manugwa, M., & Ferreira, S. (2021). The Effect of Labour Strikes in the Share Returns of 3SE. top 40 Companies – *Financial Economics Journal*, 17(4): 31 – 38.
25. Munogbo, U., Dim, E. and Akpunomu, W. (2018). Effect of Strike/Industrial Conflict in Employee Performance. *International Journal of Trend in Research and Development*. 4(6), 2018: 32-40.

26. Nkanu, O., Otu, O., & Utu-Baku, I. Strike Activities Planning in Nigerian Universities. Impact and Possible Solutions for Today and Beyond. *Global Journal of Educational Research* 22(1), 2023: 125-134.
27. Nwanze, O. & Akudu, G. (2021). Implications of the Use of Strike Action as an Instrument of Achieving Better Conditions of Service in our Educational System. *Journal of Research and Sustainable Development*. 4(1), 2021, 62 – 72.
28. Nwoko, K. (2014). Forward to the Past: Strikes and Striking as Dialogue by Other Means in Nigeria' Demographic Process. *Journal of History and Diplomatic Studies*.
29. Obiekwe, D. & Obibhunun, L. (2019). The Roles of Labour Union in Nigeria Industrial Harmony and Development. *International Journal of Sustainable Development and World Policy*, 8(1): 10-20.
30. Odeku, K. (2014). An Overview of the Right to Strike Phenomenon in South Africa. *Mediterranean Journal of Social Sciences* 5(3): 695-702.
31. Otuturu, G. (2021). Substance of the Right under International Law. The Right to Strike in Regional Human Right Law. *Citarahab International Business School Law Journal*, 3(1): 127-139.
32. Philip, A. & Ajala, T. (2017). Limiting the Statute of Limitations. An Agenda for Firm. *Journal of Private and Property Law, University of Lagos*, 35(1): 1-24.
33. Shimawa, D. (2020). Impact of Industrial Union's Strike in the Performance of Public Universities in Nigeria. *International Journal of Innovative Research in Social Science and Strategic Management Technique*. 7(1): 247 – 256.
34. Waas, B. (2012). Strike as a Fundamental Right of Workers: Its Risks or Conflicts with other Fundamental Rights of Citizens. General Report II. Paper Presented at the World Congress of Industrial Relations. Santiago De Chile, Sept, 20th.
35. Waas, B. (2014). The Right to Strike. A Comparative View. Wolters Kluwe Law and Business. New York, USA.
36. Zanath, G (2024). The Right to Strike in International Law and Legal Challenges; Exploring Alternatives to ILO Convention No. 87. *Bloc of the European Journal of International Law*. Ejvwalk.org. the right <https://www.ejvwalk.org>.