

Stakeholders working towards responsible  
business conduct in the natural stone sector

## Child labour and children's rights



In June 2021, for the first time in two decades, progress to end child labour stalled, reversing the previous downward trend. At that time, the number of children in child labour had risen to 160 million worldwide, an increase of 8.4 million children in the last four years. This number did not include the effects of the COVID-19 pandemic, which most likely exacerbates the root causes of child labour. Nine million additional children are at risk of being pushed into child labour by the end of 2022 as a result of the pandemic.<sup>1</sup> This is a very worrying development, that could also have its impact on the use of children as labour force within the natural stone sector, where (hazardous) child labour has been an issue for many years.

## Child labour and children's rights

Efforts have been made to diminish the risk of child labour: some companies have e.g. invested in projects that keep children away from quarries and factories and offer them the opportunity to pursue their right to education. It is however important to stay cautious (keep monitoring child labour and remediate when cases show up) and be aware that child labour can occur in your supply chain, despite the existence of local and international legislation. Child labour is a gross violation of children's rights and all countries worldwide have legislation on this. International Labour Organisation (ILO) conventions on child labour<sup>2</sup> and article 32 of the UN Convention on the Rights of the Child<sup>3</sup> set clear rules on child labour. The International standards like the OECD guidelines and the UN Guiding Principles describe companies responsibilities towards addressing child labour. There is also the Dutch law on due diligence on child labour<sup>4</sup> that has been approved by

1 UNICEF (2021) Child labour rises to 160 million – first increase in two decades, <https://www.unicef.org/press-releases/child-labour-rises-160-million-first-increase-two-decades>

2 ILO (consulted on 28/06/2022) ILO Conventions on child labour, <https://www.ilo.org/ipec/facts/ILOconventionsonchildlabour/lang--en/index.htm>

3 UNICEF (consulted on 28/06/2022) An international agreement for child rights, <https://www.unicef.org.au/our-work/information-for-children/un-convention-on-the-rights-of-the-child>

4 Information on 'Wet zorgplicht kinderarbeid': <https://zoek.officielebekendmakingen.nl/stb-2019-401.html>

both Parliaments, but has not yet entered into force. This law might be replaced with the broad Due Diligence legislation that is proposed by a number of political parties in the Netherlands, or by the legislation that the Dutch cabinet is working on. In Belgium, the Parliament has also taken first steps, in April 2021, towards due diligence legislation by voting in favour of a law proposal to strengthen the obligations of companies throughout their supply chains.

While many countries have laws against child labour, the enforcement of these laws and governmental systems to address child labour can be weak, particularly in low income countries. This should inform companies to enhance their due diligence in these countries.

The fight against child labour is not the only sub-theme of children's rights that companies in the natural stone industry can promote. Companies may also have an impact on and contribute to the children's right to education and play, to protection, to be heard and to participate in decision-making.

This guidance sheet will help you in addressing child rights' issues in your supply chains and gives direction on how to support these rights. Whether it is within your own business sites in risk prone countries or through your suppliers.

## Why should we address child labour and children's rights?

In recent years, public authorities in Belgium and the Netherlands have become more and more aware of the negative impact of their purchases of natural stone in public procurement processes on certain communities in production countries. This shift has taken place mainly because of the possible link with child labour.

Some production countries are adapting policies regarding child labour. In India, e.g., child labour is addressed by a recent initiative (from July 2021). The initiative of the Government of Rajasthan implies that any company that participates in a state tender will have to accept the legally bound conditions of prohibition of child labour.<sup>5</sup> Most of the sandstone in Rajasthan is bought by the government(s) in India. In that regard, this new initiative will have a positive impact on child labour in the region of Rajasthan.

Today, communities are becoming more and more aware that children have the right to go to school. The Indian government has drawn up a national action plan for tackling the problem of child labour. Child labour is still a very common issue in India and (local) laws are not enforced, but Western companies that do wish to address child labour can increasingly count on government support. Several Indian governmental initiatives exist from which workers in quarries can benefit. Due to language barriers the support of local NGOs is often crucial in giving workers access to these initiatives.<sup>6</sup>

Child labour is a reality, even more today due to effects of the pandemic, and is illegal in all countries of the world.<sup>7</sup> Because it is illegal, it is often hidden.

5 Government of India (2021), <https://finance.rajasthan.gov.in/pdfdocs/GT/10044.pdf>

6 These are findings from the TruStone multi-stakeholder dialogue in Rajasthan (2021)

7 Find here the list of countries that ratified the different conventions via: <https://www.ilo.org/global/standards/subjects-covered-by-international-labour-standards/child-labour/lang--en/index.htm>



Children make up almost a third of the world's population and interplay with business as consumers, employees' family members and workers. Within the natural stone industry, due to the physical presence of quarries, businesses often have a strong link with the communities that are close to their business sites.

Children are an important and unique stakeholder group within these local communities: they have specific vulnerabilities and needs. In some cases, business activities that have no negative impact on adults may be very harmful to children's well-being. For instance, as traffic increases on the roads that surround a new quarry, there is an increased likelihood that children will be injured or killed in accidents. This impact is in part a result of an inability to read warning signs, but it is also a product of poor internal company awareness raising on speed restrictions and community safety. Children are extra vulnerable to violence, abuse and exploitation, especially in the case of in-migration (children moving with their parents to look for work in or around quarries but also the children within the host communities might become extra vulnerable). In their due diligence process companies ought to take the specific vulnerabilities and needs of children into consideration and account for them in their business operations and value chain. Children should become part of their stakeholders group and be given the opportunity to voice their opinion and participate as this is their right according to the UN Convention on the Rights of the Child.

Addressing child labour also plays an important role in tackling poverty in production countries, which will bring economic benefits for all.

Children's rights are captured in the UN Convention on the Rights of the Child. The UNGPs require companies to implement human rights due diligence and identify and address negative impacts on amongst other children's rights. By implementing human rights and due diligence, the company's image and employee satisfaction may be impacted positively. Besides that, paying attention and taking action to protect the rights of children and improve their lives will contribute positively to the reputation of a company and may open new business opportunities for companies.

## What is child labour & what are children's rights?

The United Nations Convention on the Rights of the Child explains who children are, all their rights, and the responsibilities of governments. All the rights are interconnected and equally important and they cannot be taken away from children.

### Children's rights

A child is any person under the age of 18. And all children have [all these rights stipulated in the Convention](#). Some of these rights include the following:

- Children have the right to the best health care possible, clean water to drink, healthy food
- Children have the right to food, clothing and a safe place to live so they can develop in the best possible way.
- Every child has the right to go to school and learn.

Some children do not have access to education. Worldwide, 11 per cent of primary-school-aged children do not go to school. In low-income countries, only two thirds of children are estimated to complete primary school.<sup>8</sup> Sometimes this is due to the fact that children live in very poor conditions and have to work to survive. When a child is working and can therefore never (or not enough) attend school, this is considered child labour. Working children generally miss out on education or learn less because they have to combine learning with working. This deprives them of prospects going forward and any possibility of breaking out of the cycle of poverty.

<sup>8</sup> UNICEF (consulted July 2021) Education, [www.unicef.org/education](http://www.unicef.org/education)

In the natural stone sector, children under the age of 14 mainly work in rubble processing, including: chipping cobblestones and gravel, unloading lorries, etc. Children under the age of 18 work in quarries.<sup>9</sup>

### What is child labour?

The term “child labour” is often defined as work that deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development. It refers to work that:

- is mentally, physically, socially or morally dangerous and harmful to children; and/or;
- interferes with their schooling by: depriving them of the opportunity to attend school; obliging them to leave school prematurely; or requiring them to attempt to combine school attendance with excessively long and heavy work.

When entering into a dialogue about child labour with your supplier(s), it is crucial to understand the legal terms<sup>10</sup>, both internationally and nationally.

ILO Convention No. 138 states that the minimum age at which children can start working should not be below the age of compulsory schooling and in any case not less than 15 years; with a possible exception for developing countries.<sup>11</sup>

<sup>9</sup> TruStone Initiative – SER IRBC agreements (2019) Stakeholders working towards responsible business conduct in the natural stone sector, <https://www.imvoconvenanten.nl/en/trustone/initiatief/-/media/7182FEB8DC2549BABAFE1C34BCB7A194.ashx>

<sup>10</sup> Stop Child Labour (consulted June 2022) 5x5 stepping stones for creating child labour free zones, [https://www.stopkinderarbeid.nl/assets/SCL\\_CLFZ\\_handbook\\_FINAL\\_LR\\_complete.pdf](https://www.stopkinderarbeid.nl/assets/SCL_CLFZ_handbook_FINAL_LR_complete.pdf) and ILO (consulted June 2022) What is child labour, <https://www.ilo.org/ipec/facts/lang--en/index.htm> and ILO (consulted June 2022) Child labour in india, [https://www.ilo.org/wcmsp5/groups/public/---asia/---ro-bangkok/---sro-new\\_delhi/documents/publication/wcms\\_557089.pdf](https://www.ilo.org/wcmsp5/groups/public/---asia/---ro-bangkok/---sro-new_delhi/documents/publication/wcms_557089.pdf)

<sup>11</sup> Exceptions to the minimum age of 15 are permitted in ILO-designated countries where the economic circumstances and educational facilities are underdeveloped. The ILO designates these countries at their request and after consulting representative employers’ associations and employee representative organisations.

ILO Convention No. 182 prohibits hazardous work which is likely to jeopardize children’s physical, mental or moral health. It aims at immediate elimination of the worst forms of child labour for children below 18 years.

The following scheme from the Stop Child Labour coalition gives a good overview of the regulation on minimum ages of child labour:

### Minimum ages – there is more than one...

		Light work that does not interfere with education, health and development	Work that is neither hazardous nor other worst forms of child labour*	Hazardous work or other worst forms of child labour
18 years	Children above the general minimum age but under 18	Acceptable youth employment	Acceptable youth employment	Worst forms of child labour
14/15 years	Children below the general minimum age for work and employment	Light work only	Child labour	Worst forms of child labour
12/13 years	Children below 12/13 years	Child labour	Child labour	Worst forms of child labour

\* ILO (consulted June 29 2022) The worst forms of child labour, <https://www.ilo.org/ipec/Campaignandadvocacy/Youthinaction/C182-Youth-orientated/worstforms/lang--en/index.htm>

A company needs to thoroughly investigate its supply chains to prevent and eliminate child labour. It can also have a positive impact on the issue of child labour by setting appropriate standards for wages and working hours of its employers. The risk of child labour is linked to other major risks in the natural stone industry, like the lack of living wages and proper health and safety measures and forced labour. The root causes of child labour are embedded in low wages (for adults), harmful traditional practices, lack of law enforcement, poor education system, gender imbalances, etc. By tackling the root causes of child labour, the cycle of poverty will be addressed.

Certain operations and parts in the supply chain are prone to the risk of child labour, and this even more in specific regions. The more remote and informal a small-scale mining activity, the more likely children are to be involved. Almost all work performed by children in mining and quarrying is hazardous<sup>12</sup> and considered to be one of the worst forms of child labour.<sup>13</sup>

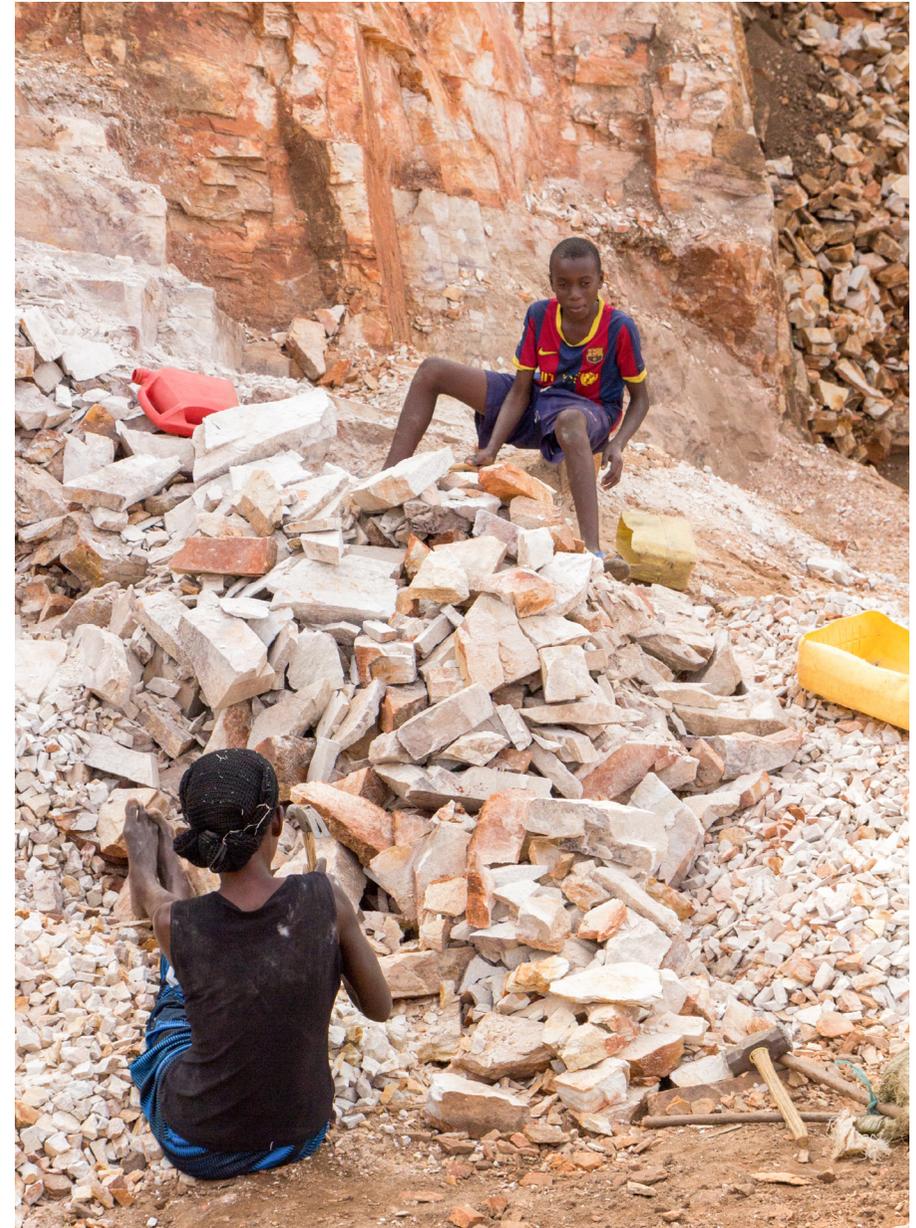
Housekeeping (cleaning, serving meals) in the quarries is mainly done by women and also children, which is seen as child labour. The making of cobble stone is known to be a part of the supply chain that is prone to child labour. To work from home (e.g. in cobblestone making) often involves children and is extremely difficult to detect.

In general in sandstone quarries, skilled work is mostly done by men while the unskilled work like loading and unloading stones and waste stone clearing is done by both men and women and paid on a daily or piece rate.<sup>14</sup> This brings along several issues in terms of children's rights. Besides the high risk of child labour in parts of the industry, irregular income (due to the piece-rate pay system) for men and women can have a major impact on the growth process of their children. Processing sandstone within households will lead to health and safety risks for (unborn) children.

<sup>12</sup> All work performed by children is hazardous unless you specify it with age and type, hours of work permitted by law.

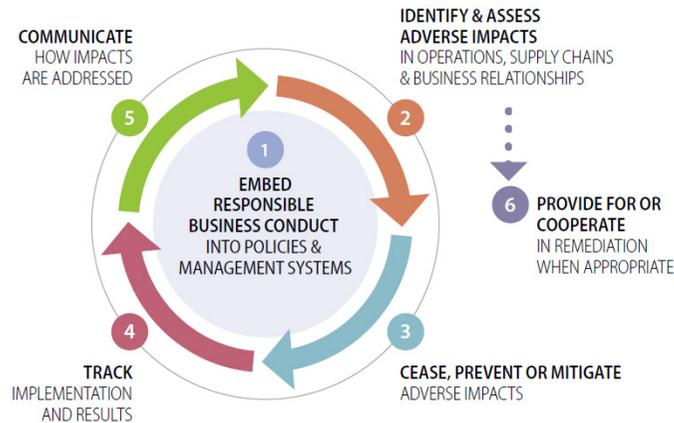
<sup>13</sup> ILO (geraadpleegd op 29 juni 2022) The burden of gold Child labour in small-scale mines and quarries, [https://www.ilo.org/global/publications/world-of-work-magazine/articles/WCMS\\_081364/lang-en/index.htm](https://www.ilo.org/global/publications/world-of-work-magazine/articles/WCMS_081364/lang-en/index.htm)

<sup>14</sup> Arisa (June 2020) Between a rock and a hard place, p.9



# How to address child labour?

## Child rights and due diligence



As a TruStone-member your company commits to tackling the issue of child labour in your entire supply chain, as required by the OECD guidelines and UNGPs. You can do this by including the theme in all six due diligence steps.

The [Childrens Rights & Business Principles](#)- set up by Save the Children, UNICEF and the UN Global Compact - provide guidance to prevent and address risks to children's rights, including child labour in all due diligence steps.

As most child labourers are engaged in the informal sector, many companies do not engage children in their own facilities and hence are not faced with the realities of the problem. When companies subcontract parts of their production to smaller factories, workshops and/or home workers, the prevalence of child labour increases drastically.<sup>15</sup>

<sup>15</sup> Stop Child Labour (2017) Cooperating with the private sector in child labour free zones in India, [https://www.stopkinderarbeid.nl/assets/HI-17-06-SKA-CSR-guidelines-India\\_HR\\_03.pdf](https://www.stopkinderarbeid.nl/assets/HI-17-06-SKA-CSR-guidelines-India_HR_03.pdf)

Your company surely can play a very important role in ending child labour in the communities where you and your suppliers operate. A multi-stakeholder approach, where you and your supplier(s) work with community groups, NGOs and/or labour unions and governments, is the recommended route towards success. The TruStone Initiative offers opportunities to reach out to experts, governments and other companies or suppliers and supports you in playing a role that fits to your capacities as a company.

### Step 1: Include children's rights in your policies and code of conduct

The first step to ensure that measures are being taken to prevent child labour from occurring within your supply chain, is to make a public statement. In this statement, there should be a description of the company's commitment to respect children's rights in your business operation and value chain. In a code of conduct, your company can stipulate what is expected of your suppliers regarding children's rights and key risk areas like child labour.

#### Example extract code of conduct

We do not accept child labour in any shape or form.  
The business partner shall comply with the national minimum age for employment, or the age of completion of compulsory education and shall not employ any person under the age of 15. For mining activities the business partner shall not employ any person under the age of 18.

Describe the company's commitment to working with governments, partners and others to respect children's rights, address child labour, ensure the right to education, living wages and sustainable solutions to address the root causes of child labour.

The example extract code of conduct here above only refers to your commitment to no child labour in your supply chains. This commitment is crucial. However, within the natural stone sector, several risks are common that can have an important impact on the development of a child's life (it's mental and physical health, it's education opportunities...). Here are some examples that can be included in your company's code of conduct or policy declaration to demonstrate your commitment to children's rights in general (that go beyond child labour)<sup>16</sup>:

- Stipulate decent working conditions and provisions for all; young workers and student workers, as well as parents and caregivers
- Define family-friendly employment terms and conditions at the workplace. This includes such elements as maternity and parental leave and benefits, flexible working arrangements and access to childcare facilities.
- Describe the company's commitment to minimising and mitigating environmental risks that may have an impact on children's health. This can include water usage, waste disposal and siting options. In all cases, it should establish company standards and targets that specifically take into account children's vulnerabilities to pollution and toxicity levels.
- Include a clear statement on the process for land acquisition and use. Outline a commitment to and procedures for consultation with local communities, including indigenous groups, and women and children. In addition, describe how resources will be managed to ensure that children and their families have access to resources, and that their livelihoods and basic services are not affected.
- Commit to ensuring the best interests of children in all community investment initiatives.
- Provide a statement on how the company meets national legislation and international principles on corporate tax obligations.
- Establish a zero-tolerance policy on any and all forms of bribery, corruption and extortion.

<sup>16</sup> UNICEF & Save the Children (2013) Children's Rights in policies and codes of conduct, [https://resourcecentre.savethechildren.net/node/7962/pdf/children\\_s\\_rights\\_in\\_policies\\_26112013\\_web\\_0.pdf](https://resourcecentre.savethechildren.net/node/7962/pdf/children_s_rights_in_policies_26112013_web_0.pdf)

The toolkit '[Children's rights in policies and codes of conduct](#)' made by Save the Children and UNICEF recommends ways for all businesses to incorporate children's rights into their policies and codes of conduct, based on the Children's Rights and Business Principles.

## **Step 2: Check the risk of child labour in your business operations and value chain**

An important step in the due diligence process is identifying adverse impacts. There are various possibilities to gather information. Public sources, like reports of NGOs, can provide information if a certain risk is common in a certain region. Suppliers can share information about their risk assessments. To enrich the gathered information and find out if a risk also occurs within your supply chain, it is recommended to start a conversation about the specific risk with (local) stakeholders and people that might be affected by the risk. Stakeholder engagement is a crucial part of implementing due diligence in line with international standards.

This social dialogue also helps in addressing opportunities to advance children's rights and to build trust and long-lasting relationships among communities. Children's rights' stakeholders include: child rights advocates, NGOs, teachers, religious leaders, health workers, parents and other caretakers. More information on how to include child rights advocates and children in your stakeholder group can be found in the UNICEF-toolkit '[Engaging Stakeholders on Children's Rights](#)'.



## Children & stakeholder engagement

### Why?

- Hear, understand and respond to children's unique opinions, views, experiences and information that can be useful to business in conducting human rights due diligence
- Obtain information about child rights impacts that can also serve as an early indicator or 'red flag' to a company
- Build trust and long-lasting relationships among wider communities, and avoid unnecessary grievances and reduce potential for community conflict

### How?

- Start conversations with child rights advocates (NGOs, teachers, health workers, parents, youth organisations, community leaders, academic experts, government entities... ) in order to understand the breadth and severity of operational impacts on children in the surrounding villages of the business' operation (e.g. quarries)
- Include child rights advocates as part of a (regular) collective stakeholder discussion
- Only consult children directly when needed (to gain information no other person can provide)

### How to include children in stakeholder engagement?

Companies should firstly engage with Children's Rights advocates, direct consultation with children can do more harm than good if not carried out appropriately and ethically.

### When consulting children directly, you and/or your suppliers should be aware of the following:

- Sufficient capacity and time is needed to effectively engage with children (a third-party should facilitate the consultation)
- There needs to be a clear return to the stakeholder for engaging in terms of improved outcomes for children
- Participation should be voluntary, with informed consent from the child and from the parents and caregivers
- Consultations should be part of a wider long-term approach to stakeholder engagement
- Child safeguards and confidentiality should be ensured throughout the process
- Consultations should be carried out with respect for the cultural practices, beliefs and norms of each community or group

### Questions you may ask your supplier:

- Is the supplier willing to start a conversation about child labour with its own suppliers?
- Are the views of children or their representatives taken into account when making business decisions?
- Is the supplier aware of reports of child labour in its supply chain?
- Has the supplier been engaged in conversations around the abolishment and prevention of child labour?

### Step 3: Take actions to reduce the risk of child labour in your value chain

With regard to child labour, here are some actions<sup>17</sup> you can take to reduce the risk:

- Communicate your child labour policy (e.g. code of conduct) to all your business relations.
- Make the minimum age policies at national and state level (if applicable) public and available, in multiple languages and understandable for low-skilled and illiterate workers.
- Integrate child labour standards through human rights clauses in contractual agreements.
- Screen business relations, e.g. use preselection questionnaires that assess child rights performance.
- Monitor child labour systematically<sup>18</sup>: one of the most potent means of addressing child labour is to regularly check the places where girls and boys may be working. Once child labour has been detected see if the children can be offered alternatives that prevent them from being pushed into more

<sup>17</sup> UNICEF & The Danish Institute for Human Rights (2013) Children's rights in impact assessments: A guide for integrating children's rights into impact assessments and taking action for children, [https://sites.unicef.org/csr/css/Children\\_s\\_Rights\\_in\\_Impact\\_Assessments\\_Web\\_161213.pdf](https://sites.unicef.org/csr/css/Children_s_Rights_in_Impact_Assessments_Web_161213.pdf)

<sup>18</sup> ILO (consulted June 2022) Child labour monitoring, <https://www.ilo.org/ipec/Action/Childlabourmonitoring/lang--en/index.htm>

dangerous survival alternatives, assist them with access to education and see if they can be replaced with an adult family member to compensate for the family's loss of income. In all cases, make sure that children are immediately removed from hazardous situations.

- Provide training to staff, like managers, to address child labour throughout the value chain.
- Work together with experts (e.g. NGOs), other companies and government(s) to address root causes and work all together on attitude change so that the actions will become sustainable.
- The provision of living wages is a crucial step in finding a solution to address child labour. Check out the TruStone [living wage guidance](#) to find out how to take steps to work towards living wages.
- Take steps to support government efforts to prevent and address child labour.

### Disengage or join forces?

When you notice your supplier is not meeting your demand to end child labour at its sites, it is crucial to continue the conversation with this supplier. This is with a view to be able to start joint efforts to end child labour, by addressing its root causes and breaking the cycle that keeps child labour in the supply chain.

A good example of joint efforts to end child labour? Set up Child Labour Free Zones:

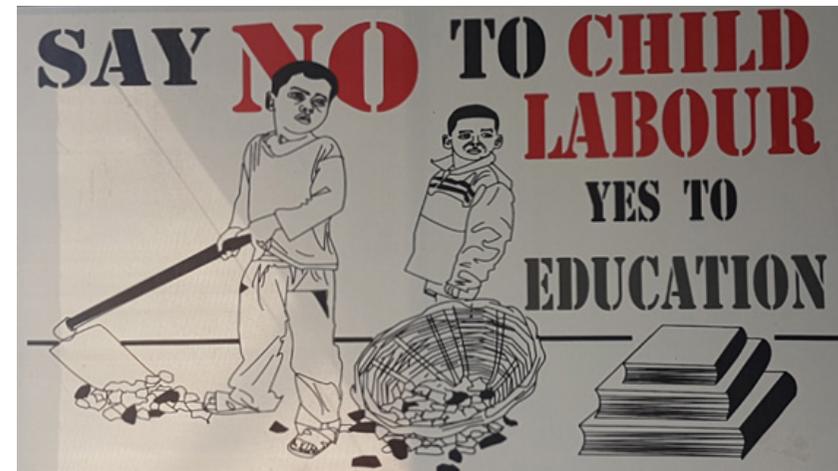
Child Labour Free Zones are geographical areas – such as a village, quarry area, urban neighbourhood, or cluster of communities – where all children are systematically being taken away from labour and (re)integrated into formal, full-time schools. No distinction is made between different forms of child labour, because every child has the right to education. The focus is on all children within that area who do not attend school.

The Child Labour Free Zones-methodology takes into account the many factors that contribute to children dropping out of school and joining the workforce.

The area-based approach towards Child Labour Free Zones involves all stakeholders, including teachers, parents, children, unions, community groups, local authorities, religious leaders and employers. The power comes from the people living in these communities who set the norm that ‘no child should work; every child must be in school’. Because of this, collaboration with your local supplier(s), who are closely related to these communities, is an important step to success.

The website [www.stopchildlabour.org](http://www.stopchildlabour.org) provides concrete steps to create a Child Labour Free Zone ([https://www.stopkinderarbeid.nl/assets/Creating\\_Child\\_Labour\\_Free\\_Zones.pdf](https://www.stopkinderarbeid.nl/assets/Creating_Child_Labour_Free_Zones.pdf)).

The project of the Arte Foundation to eradicate child labour in granite production is an example of how a Child Labour Free Zone can be implemented: [https://www.rvo.nl/sites/default/files/2020/06/70702\\_RVO\\_FBK\\_MK910-WCAG-TG.pdf](https://www.rvo.nl/sites/default/files/2020/06/70702_RVO_FBK_MK910-WCAG-TG.pdf)



*A factory in Jaipur, India displays its stance against child labour*

Actions to undertake with regard to family-friendly workplaces:

- Take into account the needs of workers with family responsibilities, including the care and support of children left behind by migrant workers. This includes offering family housing in which workers could maintain their family units, or permitting time for family reunification or family visits on company premises.
- Implement policies that allow employees to be able to reconcile family and working responsibilities at all stages of their lives. These include flexible work arrangements, childcare, leave from work to have and take care of children.

With regard to children’s rights in relation to the environment and the land acquisition and use:

- Undertake stakeholder mapping to identify local leaders in the affected area (by land acquisition or mining) to better understand community dynamics. Women, children and indigenous people are often overlooked or marginalised in stakeholder consultations.

- Bring a child-sensitive approach to assessing the impact on the environment or the place where operations take place (factories, quarries...) and the people that live there. When possible, e.g. in the case of factories, consider alternative siting options to those that are near schools, playgrounds etc... Take into account routes children use to get to school, and sports and cultural activities. Take into account children's specific vulnerabilities to resource scarcity, pollution and toxicity in health impact assessments.
- Take steps to ensure that relocated children and their families (due to the development of new quarries e.g.) have adequate housing, supporting documents and uninterrupted access to basic services, such as schools, health clinics, water and sanitation, and local transportation.

With regard to community and government efforts:

- Paying taxes, royalties, duties and other fees should be viewed as a vital way to support governments in their ability to deliver basic services to children.
- Make sure your community investments can be turned into long-term, productive community assets and are sustainable investments. Invest in programs that benefit the most vulnerable and marginalised children. Consult governments, local communities and child protection experts that can help you with identifying these children and analysing which kind of support is most needed. Invest in building capacities as well as infrastructure.

#### Step 4: Track implementation and results

The continuous follow-up of the progress of the action plan is essential. As a company you want to know if the policy and actions taken in the field of child labour and other children's rights are being executed and whether or not children are getting the protection they are entitled to.

Companies themselves could ask questions to their business partners – suppliers – and their employees (or representatives). This can be done e.g. by asking certain specific questions as referred to in [Step 2](#).

Regular inspections (both announced and unannounced) of all production units (including subcontracted and home-based) are an important step in identifying if child labour occurs, especially in high-risk areas.

When developing the processes and procedures for inspections, it is best to determine the conditions most conducive to the risk occurring.

Consider the following questions to be able to plan ahead and increase the efficiency of inspections:

- Are there certain days or times when children may be found working?
- What times are schools in session? No child should be seen in any workplace or working at home during this time.
- How many entrances and exits are there? Can the factory be approached in a way that minimises the likelihood of children being removed through those exits?<sup>19</sup>

It is important to directly involve people affected by the risk of child labour, or their representatives like parents or caretakers, teachers, NGOs, with the monitoring of the progress. One way to monitor pupils is by facilitating the formation of monitoring teams (for example one including a teacher, a student,

<sup>19</sup> Source: <https://goodweave.org/wp-content/uploads/2021/06/210617-InspectionMonitoring-GoodWeave-KFC.pdf>

and a parent) that are responsible for keeping track of a selected number of at-risk pupils in a specific geographic zone<sup>20</sup>.

Within the Child Labour Free Zone approach, community members – like teachers – are trained to track children in and out of school or children themselves check on their friends why they are not in school. (See [Step 3](#) to get to know more about how you can join efforts with other stakeholders to establish ‘Child Labour Free Zones’).

### Step 5: Communicate about efforts taken

The UN Guiding Principles on Business and Human Rights (UNGPs) and OECD Guidelines for Multinational Enterprises stress the importance of public communication of due diligence efforts and results. By showing your efforts and results in tackling child labour and promoting child rights, your companies’ profile will become much more transparent. Being transparent shall attest your company’s commitment to addressing such risks and impacts.

It could be useful to address in your communication the link between children’s rights and the Sustainable Development Goals (SDG’s) of the UN. The SDGs are recognised by companies, governments, international organisations and civil society organisations as an inspirational shared blueprint to reach peace and prosperity. All SDGs are relevant to the fulfilment of the rights of children, not only those which explicitly reference children. The SDGs cannot be achieved without the realisation of child rights.



Some companies take the initiative to make social investments in the communities where they operate. These investments can be important voluntary actions of companies to promote children’s rights and protect children’s lives in the regions where they do business. Within the communication about these efforts, it is crucial to address the way the company has made the decisions that led to these investments, how consultations with child rights’ stakeholders have taken place to understand the risks in the supply chain.

The [‘No child left behind’ – project](#) and blog of London Stone and Beltrami/Stoneasy, is an example of how companies can communicate about how they address risks related to their business and implement projects supported by experts in the region in order to play a significant role in improving the wellbeing of children.

<sup>20</sup> Stop Child Labour (2015) 5x5 stepping stones for creating child labour free zones, [https://www.stopkinderarbeid.nl/assets/SCL\\_CLFZ\\_handbook\\_FINAL\\_LR\\_complete.pdf](https://www.stopkinderarbeid.nl/assets/SCL_CLFZ_handbook_FINAL_LR_complete.pdf)

**Step 6: Make people that may be adversely affected by your or your suppliers' business operations aware of the possibility to notify the TruStone independent Complaints & Disputes Committee**

Despite the effort taken by your company to inform your suppliers about your zero child labour policy, risks might still need to be addressed. It is therefore important that workers and their families, are aware of the existence of the TruStone Complaints & Disputes Committee. People that might be adversely affected by business operations in your value chain, will only be able to address these issues when they know about the existence and role of the Committee. Children, and those who can report child labour violations on behalf of children, should be informed about the Committee via your website, your code of conduct. There might be local grievance mechanisms available, in the region where you are your suppliers are active, that could be more accessible to children and their caretakers or other community members.

You can mention the Committee as well as local grievance mechanisms (if available) during your visits to the suppliers, and use these visits to talk to workers' representatives like local labour unions and NGOs about the possibility to notify problems related to child labour and other child rights to the TruStone Complaints & Disputes Committee.

Ensure that families and children are provided with appropriate and accessible information on how relevant grievance mechanisms work (like the TruStone Complaints & Disputes Committee). NGOs or local youth clubs that work on children's rights might be called on to explain the grievance process to children.

An aggrieved person (or group of persons) that wishes to file a complaint against a company that is part of the TruStone Initiative, can contact the independent Committee by sending an email to [trustone-complaints@internationalrbc.org](mailto:trustone-complaints@internationalrbc.org).

For further questions or suggestions about this guidance: please contact the TruStone secretariat via [InitiatiefTruStone@ser.nl](mailto:InitiatiefTruStone@ser.nl)

**TIP**

would you like your company to invest in children's rights or would you need financial support to address child labour issues? Have a look at the website from [MVO Nederland](#) or the [Fund against Child Labour](#) from the Dutch Government to find out what the opportunities are to receive funding to tackle child rights' issues or to boost the sustainability of your international supply chain.

