**TEMPLATE: CHILD LABOR POLICY**

MARCH 2023

ABOUT THIS TEMPLATE

This template has been developed by the Global Business Coalition Against Human Trafficking ([GBCAT](https://www.gbcat.org/)) for businesses who want to adopt a standalone policy and commitment to address risks of child labor across their operations and supply chain.

It can be freely downloaded on the [GBCAT website](https://www.gbcat.org/) and used by corporate suppliers across any industries. This document offers an example of a comprehensive child labor policy and is subject to adaptation based on company context.

This template should be accompanied by meaningful human rights due diligence in line with the United Nations Guiding Principles on Business and Human Rights ([UNGPs](https://www.ohchr.org/en/publications/reference-publications/guiding-principles-business-and-human-rights)).

ABOUT GBCAT

[GBCAT](https://www.gbcat.org/) is a coalition of businesses committed to combating human trafficking in company operations and supply chains. GBCAT’s work is focused on survivor empowerment and employment, corporate supplier capacity building and providing resources and guidance for businesses to navigate the landscape of anti-slavery tools, trainings and organizations. BSR provides executive leadership and secretariat support for GBCAT.

For more information and to access GBCAT’s free supplier resources, visit the [GBCAT website](https://www.gbcat.org/).

[COMPANY] CHILD LABOR POLICY

OUR COMMITMENT

[Company] is committed to respecting children’s rights and prohibits the use of child labor and all forms of exploitation of children and young workers in accordance with international standards.

[Company] commits that:

* **No child labor will be used**.
  + “Child”is any person below the age of 15, below the age of completing compulsory education, or below the local minimum working age, whichever is greatest.
* **No young worker below the age of 18 will be employed in hazardous work, night work or any form of forced labor**.
  + “Young worker” is any young person who is legally entitled to work and has completed compulsory education.
  + “Hazardous work” is any work which is likely to jeopardize a child or young person’s physical or mental health.
  + “Forced labor**”** is any work or service that is performed involuntarily and under the menace of any penalty.

All [Company]’s policies and procedures must integrate and comply with this commitment.

Our commitment is guided by national legislation and international human rights standards including the [Universal Declaration of Human Rights](https://www.un.org/sites/un2.un.org/files/2021/03/udhr.pdf), the International Bill of Rights (including the Universal Declaration of Human Rights, the [International Covenant on Economic, Social and Cultural Rights](https://www.ohchr.org/en/instruments-mechanisms/instruments/international-covenant-economic-social-and-cultural-rights), and the [International Covenant on Civil and Political Rights](https://www.ohchr.org/en/instruments-mechanisms/instruments/international-covenant-civil-and-political-rights)), the [UN Guiding Principles on Business and Human Rights](https://www.ohchr.org/en/publications/reference-publications/guiding-principles-business-and-human-rights), the [International Labor Organization](https://www.ilo.org/global/standards/subjects-covered-by-international-labour-standards/child-labour/lang--en/index.htm#:~:text=The%20fundamental%20ILO%20standards%20on%20child%20labour%20are,work%20at%2018%20%2816%20under%20certain%20strict%20conditions%29.) (ILO) Conventions and the [UN Convention on the Rights of the Child](https://www.ohchr.org/en/instruments-mechanisms/instruments/convention-rights-child).

Where applicable, [Company] will apply higher human rights standards in situations where national and international human rights standards differ.

SCOPE OF APPLICATION

This policy applies to any operations conducted under [Company] name as well as to its partners, suppliers, contractors or any party with whom it does business.

[Company] expects all its business partners to follow this policy and its principles. All business partners are equally responsible for implementing and monitoring the above principles, whether through the creation of an oversight working group or though the mainstreaming of relevant principles into existing departments.

OUR APPROACH

[Company] will undertake human rights due diligence to identify, prevent and mitigate risks of child labor in line with the [UN Guiding Principles on Business and Human Rights](https://www.ohchr.org/en/publications/reference-publications/guiding-principles-business-and-human-rights). To do so, [Company] will follow a number of actions, including:

* Integrate this child labor policy in all relevant company policies and procedures, including [add relevant policies,] e.g. Human Rights Policy, Supplier Code of Conduct;
* Identify high-risk areas for child labor, directly or indirectly generated by our company operations. This can be done through risk-based mappings and prioritizations like Human Rights Impact Assessments or Sector Wide Impact Assessments;
* Establish relevant processes and integrate these into existing management systems to identify instances of child labor. This may include conducting site visits;
* Engage with relevant stakeholders on the issue of child labor;
* Build organizational capacity on child labor through learning and training, in particular of business partners and suppliers;
* Provide an anonymous grievance mechanism where all stakeholders, including employees, third-party employees, suppliers and customers, can report concerns;
* Where violations are identified, work with qualified individuals and organizations (such as NGOs, for example) to address the situation and provide appropriate remedy. This may include using leverage with partners and engaging external experts;
* Report on child labor risks to stakeholders through an annual report and/or a modern slavery statement;
* Address child labor as a systemic issue by funding human rights and sector-wide initiatives to address its root causes.

GOVERNANCE AND OVERSIGHT

Governance and supervision of our broader human rights work is ensured by [specify key functions / governance body]. [Function / governance body] is in charge of keeping all employees and partners accountable for eliminating child labor in all [Company]’s operations. To do so, it identifies strategic measures, monitors progress and takes key decisions. The [key function / governance body] is overseen by the [highest level of authority e.g., Chief Executive Officer] and includes the [relevant positions], as well as representatives from [relevant stakeholder groups].

*Signature*

[Name]

[Role]

[Date]