



**Human Rights Resource
and Energy Collaborative**

UNDERSTANDING CHILD LABOUR RISKS IN YOUR SUPPLY CHAIN



**Human Rights Resource
and Energy Collaborative**

1. Introduction

2. Understanding Child Labour

3. Practical steps you can take

4. Learn more

Introduction

This guidance is designed to help companies understand child labour, and how to identify, prevent and report suspected or actual issues.

It is an introduction to a highly complex issue that often requires specialist input. This resource should be used as a starting place and reference point to assist your understanding of the issue.

Though it has been designed for Australian companies in the mining and energy sector, its applicability extends across industries and countries, and slides may be adapted to suit your company's specific context.

The Human Rights Resources and Energy Collaborative (HRREC) is a collaboration of Australian companies in the energy and resources sector working together to share knowledge and develop practical tools for identifying and addressing human rights risks, including modern slavery and labour exploitation in supply chains.



Understanding child labour

The International Labour Organization (ILO) estimates [138 million children](#) are engaged in child labour globally, almost 8 per cent of children worldwide.

54 million children are performing hazardous work, and [more than 1 million](#) are engaged in mining and quarrying activities.

Walk Free estimates that 3.3 million children are in situations of forced labour.

While some regions have a higher prevalence of child labour, this is a global issue including for developed countries. An estimated 78 million children in child labour are in middle-income countries. Child labour risks are dynamic and shaped by local contexts. Multinational businesses have an ability to use their leverage to influence good business practice and respect the rights of children.

Companies can be connected to child labour and the ‘worst forms of child labour’. Some of these worst forms fall within the definition of modern slavery. These risks can arise through business activities and through activities in their value chains. All employees, contractors, suppliers and business partners should be alert to the risks of child labour and modern slavery and work to prevent and address them.



[Video: The Fight Against Child Labour - UN](#)



Frequently Asked Questions

Who is a child?

A child is a person under the age of 18.¹

What is child labour?

Child labour is unacceptable work that exposes children to harm or abuse because it:

- interferes with or disrupts a child's education and development; and/or
- threatens the physical, mental or moral wellbeing of a child due to the nature of the work.

Not all work performed by children is considered 'child labour'. It should not be confused with youth employment, which provides decent and safe work for children for a limited number of hours per week and is free from harm.

Is child labour only a risk in developing countries?

No. Child labour occurs globally, in both developed and developing countries.

Is child labour considered modern slavery?

By itself, child labour is not considered to amount to modern slavery. However, some of the 'worst forms of child labour' are forms of modern slavery.

What are the worst forms of child labour?

The 'worst forms of child labour' comprise²:

- all forms of slavery (e.g., trafficking, debt bondage, forced labour)
- use, procurement or offering a child for prostitution or pornography
- use, procurement or offering a child for illicit activities, for the production and trafficking of drugs
- work that is likely to harm the health, safety or morals of a child (not always modern slavery; also known as hazardous work)

Example

A local contractor hires 14-16-year-olds to work overnight shifts on the conveyor lines at a large ore-processing plant. Some are recruited through informal brokers and live in nearby camps with their families, who migrated for work. They unload heavy ore, clear blockages in crushers, and handle hazardous chemicals in processing steps without proper protection. These conditions meet the ILO definition of the 'worst forms of child labour.'

¹ International Labour Organization (ILO). (2023). Definition. Retrieved from [International Labour Organization](#).

² ILO (1999). C182 - Worst Forms of Child Labour Convention, 1999 (No. 182). ILO Labour Standards Article 3



Frequently Asked Questions

What is hazardous work?

Hazardous or exploitative work involves any work that is likely to harm the health, safety or morals of a child. No person under 18 years of age should engage in any form of hazardous work.⁴

Hazardous work conditions include:

- working underground, underwater, at dangerous heights or in confined spaces
- poor health and safety standards
- exposure to physical, psychological or sexual abuse
- use of dangerous machinery and tools; carrying heavy loads
- exposure to hazardous substances
- working long hours

What are the causes of child labour?⁵

The causes of child labour are complex, often interlinked and vary from country to country. Reasons may include:

- **Poverty** - families may need their children to work to supplement household income.
- **Lack of access to education, childcare and school closures** - parents may have to bring their children to work due to limited public services and infrastructure.
- **Cultural norms / traditions** - work by children may be expected to support families, such as through a trade.
- **Discrimination** - children from marginalised groups may be denied access to education, forcing them into work.
- **Conflict and displacement** - children in conflict regions or displaced in migration corridors leads to higher vulnerability to work.

⁴ ILO Convention No. 138 Minimum Age Convention

⁵ International Labour Organization. (2023).



Quick checklist: permitted work by age group

When working with third parties, partners or suppliers operating in local contexts with different laws, consider the following guidelines for young workers.

Basic minimum age

This can vary by a country's laws. The minimum age for work should not be below the age for finishing compulsory schooling, and in all cases not lower than 15 years of age (or, provisionally, age 14 in certain developing countries). Some countries set the minimum age at 16.

Age 12-14 'Light work'

Under international standards, children may engage in 'light work' that is not likely to harm their health or development. This work should not limit school or vocational training attendance and is commonly capped at 14 hours per week, though limits vary per national law.

Age 15-17 'Minimum working age'

The minimum age of employment is 15 years (or 14 in developing countries with exceptions) provided this aligns with the minimum age for finishing compulsory school education in that country.

Young workers should not carry out hazardous or night work and in many countries, hours are capped.

Age 18+ 'Hazardous work'

The minimum age for hazardous work is 18 years. This may be reduced to 16 years if the health, safety and wellbeing of children is fully protected. No child under 18 should be engaged in the worst forms of child labour.

Apprenticeships, internships, work experience

Programs such as apprenticeships, internships or work experience programs may hire young workers (age 15 years and above) these are considered youth employment programs and not child labour. Participation in decent youth employment programs can be a positive experience for young workers who have reached the required age, provided safeguards are implemented to respect their rights, safety, personal development, education and wellbeing.



Procurement: Three priorities for supplier engagement

1. Talk to suppliers

Confirm whether they have a policy to prevent child labour and ensure they understand your expectations (e.g. as set out in your Supplier Code of Conduct or contract clauses).

If a supplier lacks a formal policy, discuss how they manage risks in practice. For example:

- How do they verify workers' ages?
- How are workers recruited?
- What are pay and working conditions like?

Flag gaps in a supplier's practices with Legal, Procurement and other relevant functional areas. Strongly encourage the supplier to adopt a formal policy and update contract templates.

2. Know the hot spots

Be aware of the countries, sectors, and stages of the mining cycle where child labour is most common.

Higher-risk settings include, for example:

- Construction services that rely on temporary contractor workforces. These often require families to move frequently, increasing the likelihood that children accompany parents and end up working.
- Gravel and crushed stone supply chains, where informal, low-skilled work is often linked to artisanal mining and quarrying, making oversight and age verification difficult.

3. Spot the red flags

When visiting suppliers' facilities or factories, watch for signs that may indicate child labour risks, such as:

- Children present in the factory or facility and whether it is before, during or after typical school hours.
- Missing employee contracts
- Workers unable to provide proof of age
- Workers doing long hours or hazardous tasks
- Workers and families living on-site

Consider where in your policy framework this issue could be covered, for example:

- A standalone child labour policy
- Whistleblower grievance policy
- Human rights policy
- Remedy action plan or framework
- Modern slavery policy



Addressing child labour in communities near your operations

Companies can play an important role in preventing child labour in communities near their operations.

Consider the following actions:

1. Engage with local partners

Build proactive partnerships with governments and/or civil society organisations that specialise in children's rights. These partnerships can help inform social investment strategies (such as access to education or vocational training), regional economic development programs, and support with remediation efforts if needed.

Tip: Start by reviewing your existing community engagement or social performance plans to identify opportunities for collaboration.

2. Recognise and manage the risk:

Include child labour as a recognised risk in company assessments. This ensures that:

- Human rights assessments and due diligence programs explicitly consider children's rights.
- Teams across functions (such as procurement, human resources, and community engagement) can track and manage risks systematically.
- Any concerns are addressed quickly and consistently.

Tip: Maintain a risk register that identifies where child labour risks are most likely, for example, certain local industries, informal labour supply chains, or any seasonal work patterns.

3. Raise awareness and build capacity

Equip company staff and partners to identify, prevent and respond to child labour concerns. Actions can include:

- Developing training for site teams and local suppliers
- Raising awareness about local risk factors and children's rights
- Encouraging reporting of concerns in a safe and confidential manner

Tip: Collaborate with local teams and experts to adapt training to the cultural, social, and economic context of the host communities.

Responding to cultural norms and local context

Child labour risks should be understood within the broader social, cultural and economic context, recognising that governments hold the primary responsibility for protecting human rights. Effective prevention requires close collaboration with governments, civil society, and community stakeholders. Programs, training, and awareness-raising efforts should be adapted to the local context and address the root causes of child labour, such as limited access to education or economic pressures on families.

Reporting concerns

How to report:

1. Report concerns to your manager or a senior leader.
2. Submit information via your company's Speak Up line, whistleblower or grievance mechanism.

Considerations when responding:

- If you suspect or discover a case of child labour, act immediately.
- Prioritise the interests of the child first and foremost and ensure your actions do not put affected people at additional risk of harm.
- Consider whether and when to involve police or law enforcement and assess if doing so could increase risks for those affected.
- Speak to children's rights experts (such as the [Centre for Child Rights and Business](#) or [Global Child Forum](#)) and your legal teams to understand the local context. Ideally, engagement with expert organisations occurs as soon as child labour is identified as a potential risk factor on a work site.

Make a submission:

Notify the Australian National [Children's Commissioner](#) of any child labour you encounter, including the remediation actions taken and their outcomes.

Should I immediately terminate a contract with a supplier if I suspect child labour?

No, as this would leave the child and their family in the same harmful situation. Instead work with the supplier to improve their practices and provide remedy.



Learn more

Tools and resources

- [List of Goods Produced by Child Labor or Forced Labor](#) - U.S. Department of Labor, Bureau of International Labor Affairs
- [Child Labour in Mining and Global Supply Chains](#) - International Labour Organization
- [What is Child Labour?](#) - International Labour Organization
- [Child Labour Guidance Tool for Business](#) - International Labour Organization
- [Young People and Work: Guidance for Clients](#) - European Bank for Reconstruction and Development
- [Guidance on Child Labour and Responsible Business Conduct](#) - UNICEF
- [DFAT Child Protection Guidance Note – Extractive Industries](#) - Australian Department of Foreign Affairs and Trade
- [How to Do Business With Respect for Children’s Right to Be Free From Child Labour](#) - Shift, International Labour Organization & International Organisation of Employers
- [Modern Slavery Response & Remedy Framework](#) - Walk Free & Human Rights Resources and Energy Collective

International Child Labour Standards

- [Convention 138 - Minimum Age Convention, 1973](#) - International Labour Organization
- [Convention 182 - Worst Forms of Child Labour Convention, 1999](#) - International Labour Organization

