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Reviewing child labour and its worst forms: Contemporary theoretical and policy agenda

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Abstract

The global response to child labour is based on the standards set by three major international conventions. This review examines the historical development of the conceptualizations of various forms of child labour, relevant views and perspectives, contemporary theoretical underpinnings, and policy suggestions. The emerging evidence shows that child labour incidences in all its forms have increased in many parts of the world, and the global target to eradicate child labour by 2025 seems unattainable. The evaluation indicates that the current global age-based abolitionist policy to fight child labour has lost some ground. The covid-19 pandemic has worsened the situation and the worst forms of child labour have become even more widespread and deeply normalized in many contexts and communities. The current scholarship of child labour remains critically ignorant of the relevant societal and cultural norms. Contemporary theorists and empiricists emphasize on constructing knowledge with the children and families engaged in child labour and focusing on finding innovative community-led alternatives to the worst forms of child labour. Regulations, policies, and support programmes must recognize the economic contribution of working children and work towards the children's best interests.

Key words: Child labour, Worst forms of child labour, Hazardous labour, Global policy, Emerging evidence, Contemporary debates

1. Introduction

Although child labour is an age-old phenomenon, the effort to reduce its incidence was first formally adopted in the United States in 1938 when the Fair Labor Standards Act prohibited oppressive child labour and set the minimum age of employment to sixteen (Shefelman 1939). However, the international consensus to eliminate global child labour to allow children a formative childhood developed in the second half of the twentieth century (Dessy and Pallage 2005). Reflecting on this general agreement, three international conventions – ILO Convention No. 138 on Minimum Age for Admission to Employment in 1973, United Nations Convention on the Rights of the Child, 1989 (UNCRC), and ILO's

Worst Forms of Child Labour Convention, 1999 (No. 182) – have standardized the legal parameters of child labour and provided the basis for global action against it (Bhukuth 2008; Khan et al. 2015). During this period, child welfare emerged as a major global concern and harmful child labour significantly declined in the western developed countries (Cunningham 2000). In the twenty-first century, international development agencies have run comprehensive global policy strategies, namely developing fresh regulatory and conventional frameworks to protect children, promoting decent work opportunities for young adults, providing social protection to children in need, ensuring access to education, and shielding children against a wide range of vulnerabilities (ILO 2019). Besides enacting anti-child employment legislation, national governments have undertaken various measures – rules, policies, and programmes – to sanction and cease the practice of harmful child labour. Local government and non-government organizations have also initiated projects, interventions, and schemes to support poor children and their families so that they can find alternatives to child labour. However, the latest global estimates (recorded in 2020) show that global progress against child labour has stalled.; 160 million children remain engaged in child labour, according to statistics from various international organizations. This number is 8 million more compared to 2016 (in absolute terms), while the percentage has stayed the same (ILO and UNICEF 2021). In addition, the economic and livelihoods disruptions caused by the ongoing Covid-19 pandemic are forcing countless vulnerable children into child labour across developing countries (Hoque 2021; Kaur and Byard 2021). Now in 2021 (which UN declared the international year for the elimination of child labour), an analysis suggests that 8.9 million children will engage in the practice by 2022 (ILO and UNICEF 2021). The increasing number and eroding situation indicate that the current policies and actions to fight harmful child labour are losing ground¹.

The scholarship of the issue of child labour has also travelled far and deep since a wide range of perspectives and scholarly debates have compounded the understanding of the relevant concepts, causes and consequences. Dominant theoretical approaches to study and explain child labour come predominantly from the perspective of economics (K. Basu 1998; K. Basu and Van 1998; Gupta 2001; López-Calva 2001); political economy (Bachman 2000; Dimova 2021; Maffei 2005), modern slavery (Nolan and Bott 2018), morals and ethics (Satz 2003) and human rights (Humbert 2009). Some studies present global perspectives (Develtere and Huybrechs 2008; Myers 1999), while others focus on national and local contexts (Webbink, Smits, and de Jong 2012). However, the academic disputes regarding various forms of child labour, and the direction of evidence-based policy suggestions in addressing those forms, have been the highlights of this scholarship. In this essay, I review this scholarly journey concerning global child labour, explore the gaps and argue why it is imperative to emphasize on finding alternatives to the worst forms of child labour instead of eliminating its generic forms.

¹A UNICEF press release, published on the 10th of June 2021, quotes its executive director saying, “we are losing ground in the fight against child labour, and the last year (with global lockdowns, school closure, economic disruptions, and shrinking national budgets) has not made that fight any easier” (UNICEF 2021).

2. Conceptualizing Child Labour: Issues with Definitions and Forms

With no universally agreed definition, child labour remains a deeply contested concept (Abebe and Bessell 2011; Bhukuth 2008; Erdem Türkelli 2019). While work and labour for children are often used interchangeably in literature, the ILO categorizes three types of working children: children in employment, child labourers, and children in hazardous work (Fors 2012; ILO 2006). Some commonly used criteria to define labour for children are ‘age of the child’, ‘number of working hours’, ‘type of work’, ‘location and environment of work’ and ‘what it limits or offers’ (ILO, 2017). The current classifications are multifaceted, but in a nutshell, child labour refers to the work that deprives children of their childhood, their potential and dignity, and which is harmful to their physical and mental development (ILO, 2018). Khan et al. (2015) argue that child labour is a legal rather than a statistical concept since standards set by the conventions provide the basis of national and international actions against it. The provisions set by the ILO convention No. 138 were – (a) the minimum age for any economic activity of children is 12, (b) regulations may permit the employment from 13 years of age (12 years in developing countries) in ‘light work’², (c) legislations can set the minimum age as 14 – 16 for non-hazardous work, and (d) the minimum age is 18 for ‘hazardous works’ (i.e., work that its by nature or the circumstances in which it is carried out, is likely to jeopardise the health, safety or morals of young persons). The UNCRC, recognizing labour rights, have demanded the protection of children by being exploited through enacting regulations for working hours and conditions, and sanctions for breaches relating to this (Erdem Türkelli 2019). Following this conventional advancement, ILO launched the International Programme on the Elimination of Child Labour (IPEC) in 1992 to promote a global organization to combat and eradicate child labour practices. However, by the mid-1990s, it became more commonly understood that not all work is harmful for children. Some work could be beneficial to achieve survival levels of consumptions and also to acquire skills (Rogers and Swinnerton 2002). During this period, economic models of Basu and Van (1998) and Rogers and Swinnerton (2002) established how shortage of adult labour and parental misbeliefs can result in child labour. Kabeer et al. (2003) showed that lack of educational opportunities can also result in child labour. The issue of child labour, which was once defined only by the minimum employment age, now has various socio-economic facets to it, Therefore, the Millenium Development Agenda, which primarily focused on education, health, and poverty reduction was seen as a win-win strategy to reduce child labour. (Grimsrud 2003).

² Article 7 of the Convention defines “light work” as works (a) not likely to be harmful to their health or development; and (b) not such as to prejudice their attendance at school, their participation in vocational orientation or training programmes approved by the competent authority or their capacity to benefit from the instruction received (Khan et al. 2015, 3).

Eventually, to maneuver a wider consensus and more effective direction towards fighting global exploitative³ or harmful child labour, ILO Convention (No. 182, Article 3) defined ‘the worst forms of child labour’ as:

- a) all forms of slavery or practices similar to slavery, such as the sale and trafficking of children, debt bondage and serfdom, as well as forced or compulsory labour, including forced or compulsory recruitment of children for use in armed conflict;
- b) the use, procuring or offering of a child for prostitution, for the production of pornography or for pornographic performances;
- c) the use, procurement or offering of a child for illicit activities, for the production and trafficking of drugs as defined in relevant international treaties; and
- d) work which, by its nature or the circumstances in which it is carried out, is likely to harm the health, safety, or morals of children.

Through this Convention, ILO/IPEC prioritized the elimination of the worst forms of child labour and marked a significant shift of global policy. Hazardous works (i.e., sexual work, work in mining or underground or at high altitudes, work with dangerous machinery, chemicals or substances) which represent the largest category of children working in the worst forms, also became a priority within the elimination agenda (Brando 2020). In 2002, IPEC, in its flagship global report ‘A Future Without Child Labour’, clarified this abolitionist policy and the basic distinctions embodied in the ILO Conventions Nos. 38 and 182 with an explanatory figure (Internationales Arbeitsamt and International Labour Conference 2002). As illustrated in Figure 1, the (unconditional) worst forms of child labour (i.e., slavery, trafficking, debt bondage and other forms of forced labour, forced recruitment of children for use in armed conflict, prostitution and pornography, and illicit activities) were universally prohibited for everyone below 18 and prioritized for elimination, followed by hazardous labour. The shaded area in figure 1 represents the abolition criteria, while the non-shaded area represents the acceptable child work. This is offered as a guide to governments across the world to formulate national abolitionist and restrictive legal and policy frameworks to fight global child labour. This acts as a shift from previous sudden and radical abolition of all types of child labour to a more sensible gradual approach (Brando 2020).

³ Rogers and Swinnerton (2002) notes that the term *exploitative child labor* generally emerged to distinguish certain works that were clearly harmful to the children involved.

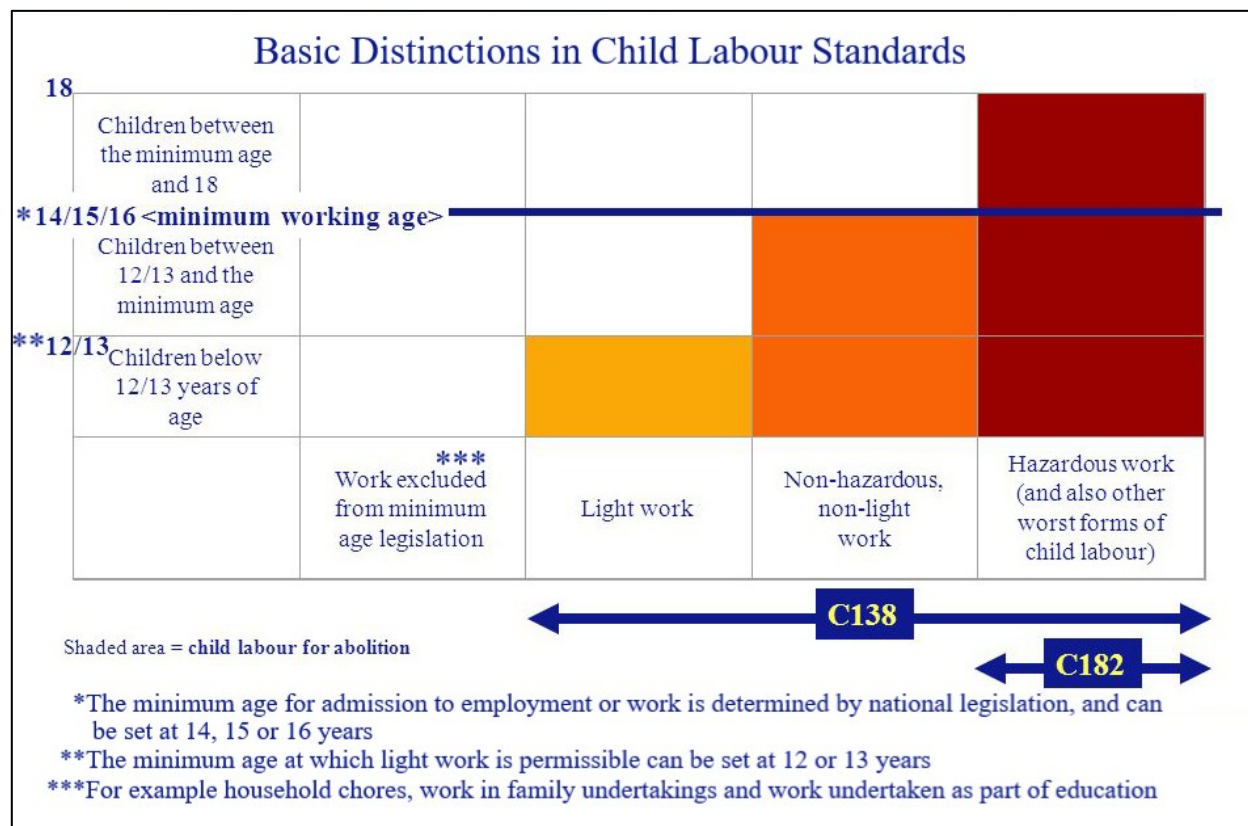


Figure 1: Basic distinctions in ILO child labour standards (Source: IPEC 2002).

Many expected that the introduction of this new abolitionist policy would direct governments and agencies to formulate targeted policies and programmes to support children and families engaged in the worst forms of child labour. This could potentially work to eradicate the worst forms from developing countries. However, the definitional and conceptual interpretation regarding child labour became even more complicated in the 2000s, when growing evidence pointed out heterogeneous socio-cultural views and their different implications in various contexts. Edmonds et al. (2008) reviewed 34 theoretical pieces, 90 empirical research works, and 27 national studies conducted by various statistical bureaus, and found that what is meant by ‘harmful work’ for children had been interpreted in several ways. Further, child labour was understood to “refer to activities in which child participation makes the child worse off”. This created a problem since it was not possible to know from those statistical reports what working children would have been doing had they not been engaged in labour. The review also critically noted that hazardous work, which was defined based on the characteristics of the work instead of relying on the alternatives, did not face the question of the counterfactual intrinsic. Bhukuth (2008) argues that these various takes on the issue of child labour make it a heterogeneous phenomenon. Further, he says that taking poor and marginalized children away from hazardous work may, instead of solving the problem, deepen their marginalization. The debates and controversies further intensified with some emerging theoretical and empirical works (Abebe and Bessell 2011). A few pertinent

questions remained problematic to answer – (i) what is harmful work and what is not? (ii) How do we differentiate between hazardous, potentially hazardous, and non-hazardous work? (iii) Who exactly will specify these terms?

After acknowledging the problems with the current classifications of the aforementioned forms of child work/employment introduced by ILO, Brando (2020) summed up the difference pointing out that child work is paid or unpaid work that causes no harm to children’s health or personal development and does not affect their schooling (see figure 2). In contrast, generic labour harms children’s personal development and dignity, hazardous labour harms children’s health, safety and moral of children, and the unconditional worst forms are illicit and unacceptable⁴. This latest classification of defining terms of child labour,





 Child Employment	 Child Labour	 Hazardous Labour	 Worst Forms
<p>Work in any form of market production and certain types of non-market production.</p> <p>Formal/informal; paid/unpaid; in/out of family.</p>	<p>Deprives them of their childhood, potential, dignity, and that is harmful to their development.</p> <p>Mentally, physically, socially and morally dangerous; interferes with school.</p>	<p>By its nature or the circumstances in which it is carried out, is likely to harm the health, safety or morals of children.</p> <p>Used as proxy category for ‘worst forms’.</p>	<p>Enslaved, separated from their families, exposed to serious hazards and illnesses and/or left to fend for themselves.</p> <p>Slavery, prostitution, illicit activities, armed conflict.</p>

Figure 2: Simplified definitions of child employment, child labour, hazardous labour, and the worst forms of child labour (Source: Brando, 2020)

unfortunately, has not led to a better clarification of the concept.

Fors (2012) notes that the common perception of child labour occurring in industrial settings such as a factory or mine was somewhat mistaken since the majority of children were employed by their parents to work in family farms or businesses. Although poverty remained the underlying factor of child labour, evidence showed that alongside subsistence poverty, market imperfections, global supply chains, household and parental characteristics, macroeconomic national and international political factors and lack of implementation of laws and policies may all contribute to the decision to send a child for labour (Bachman 2000; Doepke and Zilibotti 2009; Fors 2012; Tama et al. 2021). In the 2000s and 2010s, cities in the global south have experienced rapid urbanization which resulted in massive rural-to-urban migration, increased urban poverty, and practices of hazardous child labour in industrial jobs (Ensing 2009; Narasaiah 2005; Save the Children 2012; Webbink, Smits, and

⁴ Although ILO Conventions No. 138 and No. 182 specify unacceptable forms of child labour that are to be abolished, the problem arises when poorly designed labour force surveys fail to reflect the distinction between acceptable and unacceptable forms of work for children (National Research Council 2004).

de Jong 2012; World Vision 2014). These hazardous jobs in urban industries attracted millions of families to engage their children in child labour in informal economies. Gutheil (2019) describes how millions of children are trapped as labourers – *mired* in mining in DRC; *enslaved* in fishing in Philippines; *surrounded* by tobacco in Zimbabwe and Indonesia; *hemmed* in by cotton, clothing and chocolate in Kyrgyzstan, Bangladesh, and China; and *burdened* in brick kilns in India. Child labour even in its worst forms are regularly detected and reported from many parts of the developing world. Due to the high degree of prevalence, some industrialized places have been marked as ‘hotspots’ of child labour (Subrahmanian and Groppo 2020; Wood 2010). Fresh forms of hazardous and harmful child labour are on the rise in many contexts (Ampofo 2021; Frimpong et al. 2021; Ali 2021). Academics and researchers have embarked on new approaches to unpack these contexts to generate insights and construct knowledge. The outcomes demand an impetus in shifting the direction towards eliminating the worst forms of child labour.

Target 8.7 of the 2015 UN Global Sustainable Development Agenda asks governments and agencies to take immediate and effective measures to “...secure the elimination of the worst forms of child labour, including recruitment and use of child soldiers, and by 2025 end child labour in all its forms.” However, with the increasing number of working children engaged in a wide range of the worst forms of child labour in a more urbanized world, this target remains seemingly unattainable.

3. Contemporary Theoretical Perspectives and Knowledge Needs

Global policy responses formulated by the abovementioned ambiguous conceptualizations of child labour have drawn critical responses and theoretical debates. These debates continue to shape the understanding of child labour and its various forms, identify the gaps in existing knowledge, and to suggest ways in which inquiries may be conducted. Erdem Türkelli (2019) illustrates three key debates in relation to the currently dominant discourse of eliminating child labour in its all forms (i.e., keeping children away from paid work is always beneficial). First, the critics of minimum age for work argue that such restrictions do more harm than good, because it pushes working children further out into the fringes of the labour market and encourages hidden practices under informal arrangements (Aufseeser et al., 2017; Bourdillon et al., 2009; Bourdillon & Carothers, 2019). Fors (2012) argues that bans, boycotts, and trade policies cannot effectively reduce child labour incidences. Referring to the studies of Basu and Zarghamee (2009) and Doepke and Zilibotti (2009), Fors contends that a generic ban would be difficult to enforce in the rural areas, and such a ban by local or international trading partners on goods that children produce may drive child labour out of the export sector and into other formal or informal sectors of the economy. Second, the current conceptualization of exploitative child labour lacks meaningful engagement of the most vulnerable children, families and communities (Bourdillon and Carothers 2019; Liebel 2012). Instead of taking an abolitionist approach, prioritizing a participatory approach to children’s work-related health and environmental rights could be useful (Hanson and Nieuwenhuys 2013; Posso 2019). Such approaches can

allow communities and families themselves to find alternatives to the worst forms of child labour. Third, there is a lack of clarity in terms of how restriction-based approaches distinguish between hazardous and non-hazardous work in relation to wfcl, and various crimes such as sex work, and child and drug trafficking (Fontana and Grugel 2015; Huijsmans and Baker 2012). Therefore, legislations of prohibiting the worst forms of child labour cannot be effective if associated social, economic and cultural factors are not adequately addressed.

The traditional theories and studies of child labour have a heavy focus on socio-economic factors. However, the theoretical understanding of why child labour occurs is still lacking on a few critical fronts. Firstly, these dominant perspectives largely concentrate on the wider understanding of child labour but does not differentiate this to the worst forms of child labour to any great extent in their analyses. In fact, the issue of worst forms of child labour has received little attention from theorists⁵ and empiricists (Abebe & Bessell, 2011; Basu & Chau, 2007). Secondly, evidence suggests that in many contexts child labour in all its forms has become part of cultural normalization and socialization processes (Delap 2001; Ensing 2010; Tshabangu 2018). However, very few theoretical attempts have been made to understand the cultural persistence of child labour in these contexts. Third, the existing evidence of child labour largely comes from surveys of children, which alone cannot be informative about the determinants (Edmonds, 2007). Gatsinzi (2020) argues that in many contexts, states fail to provide children with legal birth registration documents, which makes the regulation difficult to impose and raises questions about those surveys determining the exact chronological age of such children. These issues shed light on the current policy's lack of understanding of cultural relativism (Gatsinzi 2020). Therefore, context-based qualitative research can generate more insightful understanding and policy recommendations.

The most common explanation of child labour that IPEC puts forward (i.e., work that deprives children from their childhoods) fundamentally involves two concepts – child and childhood (ILO 2004). How ‘child’ is defined and what childhood entails in a socio-cultural context are complex social functions of various factors that are continuously evolving (Karikari 2016; Takyi 2014). What characteristics distinguish an adult from a young child vary in terms of location, cultural attitudes, and time variables. For instance, an individual's biological age is still not a prime factor in determining childhood in some societies (Karikari 2016; Takyi 2014). What a young child was expected to do during the Industrial Revolution in the UK, was different to today's societal values and norms (Cunningham 2000; Humphries 2010). From a normative perspective, Satz (2003) argues that not all societies define childhood in terms of chronological age. Instead, they actively consider social factors too. Modern societies view children as developing persons whose incomplete cognitive, moral, and affective capacities to behave competently in their own interests justify adults' paternalistic behaviour to protect, nurture, and educate them through socialization, Satz adds.

⁵ Dessy and Pallage's (2005) theory of worst forms of child labour is limited to its economic propositions and deals with parental investment in children's education.

Societal norms and beliefs are long-established and hold communities together across all societies. Several economic studies have explored how social norms (with their adopted definitions), along with other factors such as poverty, influence children and families to engage in child labour. For instance, Basu and Van (1998) provides a critical understanding of parental altruism and household norms regarding child labour decisions. López-Calva (2001) constructed the ‘social stigma model’ to explain the supply of child labour in societies which disapprove of people sending their children to work and where parents care about that ‘embarrassment.’ Goto's (2011) theoretical analysis of household decisions on child labour in relation to materialistic utility and societal norms highlights the importance of adult labour efficiency. After analyzing three relevant dominant discourses – (i) the work-free childhoods perspective; (ii) the socio-cultural perspective; and (iii) the political economy perspective, Abebe and Bessell (2011) suggest that the causes and nature of children’s work, and the problems and benefits associated with it, can only be understood within the local ecological context. Krauss (2016) terms this ecological approach of studying cultural influence as ‘social norms viewing child labour as part of socialization’. These emerging theoretical underpinnings call for the construction of knowledge in participation with children engaged in child labour and their families and to look for ways to build community-led solutions.

4. Emerging Evidence and Policy Discussions

Why harmful child labour still widely persists is a contemporary question in academia, and a few recent studies have attempted to provide answers. The issue remains widespread even in societies where income poverty has significantly declined, making it a real puzzle for many scholars. Sarkar and Sarkar (2016) chose an economic perspective to this puzzle and highlighted the role of income inequality as a channel for the transmission of child labour. They also showed that free public education may raise schooling, improve health, and reduce income inequality, but does not necessarily eradicate child labour.

Recent estimates and surveys reveal that child labour incidences have increased in many parts of the world, even in their worst forms. In 2020, about seventy-nine million children were engaged in hazardous work, and more than one-fourth of children within the age bracket of 5 to 11 were in family-based child labour likely to harm their safety, health, and morals (ILO and UNICEF 2021). The findings of a recent survey which adopted ILO’s definition of the worst forms of child labour reveal that 34.6 percent of children living in the poor slum areas of Dhaka – the capital city of Bangladesh⁶ – are found to be engaged in the worst forms of child labour (Maksud, Hossain, and Arulanantham 2019). Kasper's (2021) review of 48 recent academic sources reveals that social and spatial economic informalities are creating spaces in urban neighbourhoods with specific dynamics driving families to engage in the worst forms of child labour. Several reports and papers published by the Child

⁶ The findings of the survey are distressing since the Bangladesh Labour Act, 2006 prohibits the employment of any child less than 14 years of age in any occupation or establishment and strictly bans the employment of anyone below 18 in certain enlisted hazardous works.

Labour Action-Research-Innovation in South and South-Eastern Asia reveal that various forms of hazardous child labour remain widespread across many economic sectors and business supply chains in the capital cities of Bangladesh, Myanmar and Nepal (Aked 2021; Constant et al. 2020; Oosterhoff and Hacker 2020). Gatsinzi (2020) notes that child labour in rural sub-Saharan Africa is far more nuanced than has been diagnosed by current donors. During the pandemic, many developing countries have witnessed a sharp rise in child marriages which exposed millions of children to the worst forms of child labour (Bhatnagar 2021; Hoque 2020). These findings indicate that the worst forms of child labour have not only become widespread but also widely normalized in many hotspots.

Governments across many developing countries fail to administer legislation and policies against child labour in these hotspots. De Guzman Chorny et al. (2019) studied analyses of child labour legislation from 193 UN member states and revealed that one in five ratifiers of ILO and UN Conventions legally allow children to do hazardous work. The analyses further showed that the loopholes in legislation and implementation continue to undermine children's right to protection. Das and Chen (2019) note that although the economic aspects of child labour have rightly received much attention, other aspects including violence against children as workers have been largely neglected. The issue of labour rights of the working children has also been significantly absent from contemporary policy discussions. Howard (2014) argues that if child labour is not going to be eradicated, it should at least be formalized, regulated, and recognized for the best interests of the children. In 2014, Bolivia brought a legal amendment to the *Code of the Child and Adolescent*, setting a new national standard (i.e., allowing children ten years old and older to work independently) to recognize the indigenous traditions and the country's social and cultural realities (Liebel 2015). This law challenged the dominant abolitionist policy and contained provisions pertaining to the protection of working children (Howard 2014). However, the initiative received intense criticisms from a faction of the international community led by ILO and the United States government, and eventually, those provisions (regarding the legal protections for working children under the age of 14) were removed in 2018 without consulting the children (Liebel 2019). On this background, Willman (2020) finds that children in Bolivia still possess various perspectives on working, which permit us to move beyond current debates of child labour and recognize children's views and aspirations.

Previous qualitative studies have also illustrated the importance of integrating children's views and engaging families in constructing the understanding of harmful child labour (Jijon 2020; Togunde and Weber 2007; Zhang et al. 2019). Karikari's (2016) critical discourse analysis of the worst forms of child labour points out that current policies are not cognizant or sensitive to local constructions and conceptions of appropriate roles of children at various ages. Jonah and Abebe (2019) argues that while the current abolitionist framework emphasizes children's right to education, the dichotomy is that most children support their schooling through their income. They add that the concept of work-free childhoods is at odds with prevailing sociocultural and economic realities. These discussions highlight that the current global and national policies are neither based on the context-specific evidence, nor formulated for the best interests of the working children.

The emerging evidence necessitates immediate attention to the children engaged in the worst forms of child labour, and their families. Generic child labour has been rooted in cultures, systems, and traditions across many societies. Policy and support programmes should aim to attack the socio-cultural norms and realities that generate hazardous labour and the worst forms of child labour.

5. Conclusion

This review has illustrated the historical developments of the understanding of child labour and demonstrated how definitions and classifications of child labour has shaped the global fight against this phenomenon. Scholars continue to debate various approaches to study and understand the phenomenon of child labour but have struggled to find effective ways to address the issue. With the rapid urbanization, social exclusion, and destabilized livelihoods in the current pandemic-affected world, child labour incidences in all forms continue to increase and pose a great threat to the progress of many developing countries. With the changing nature and landscape of hazardous labour, the dominant global age-based abolitionist ideology has not been successful. Contemporary theorists and empiricists have emphasized understanding local contexts and generating qualitative evidence through involving the families and communities where children are engaged in harmful child labour. The eradication, or at least the alleviation, of the worst forms of child labour must be prioritized, and innovative community-led participatory solutions can help to reduce harmful social and cultural norms that normalize harmful child labour in its biggest hotspots. The emerging evidence and critics point out that children's contribution through labour in their own lives and in supporting their families must be recognized. Therefore, policies should regulate the phenomenon in ways that can ensure children's best interests, and support programmes must target the elimination of the root causes of child labour and provide the alternative to its worst forms.

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