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THE REPUBLIC OF UGANDA
MINISTRY OF GENDER, LABOUR & SOCIAL DEVELOPMENT

Enabel

COMBATING CHILD LABOUR IN UGANDA:

Lessons from Select Sub-Saharan Countries

REPORT

July 2026

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List of Abbreviations

ACERWC	African Committee of Experts on the Rights and Welfare of the Child
ACRWC	African Charter on the Rights and Welfare of the Child
ARBHR	Advancing Respect for Human Rights by Businesses in Uganda
AU	African Union
BCEA	Basic Conditions of Employment Act
CLFZs	Child Labour Free Zones
CLMRS	Child Labour Monitoring and Remediation Systems
CLPA	Child Labour Action Programme
CRC	Convention on the Rights of the Child
CSG	Child Support Grant
CT-OVC	Cash Transfers to Orphans and Vulnerable Children
ECOWAS	Economic Community of West African States
ENABEL	Belgian Agency for International Cooperation
EU	European Union
FCUBE	Compulsory Universal Basic Education
FPE	Free Primary Education
GSFP	Ghana School Feeding Programme
HIV/AIDS	Human Immune deficiency Virus/ Acquired Immune deficiency Syndrome
IGAD	Intergovernmental Authority on Development
ILO	International Labour Organisation
ISER	Initiative for Social and Economic Rights
KII	Key Informant Interviews
KIPPRA	Kenya Institute for Public Policy Research and Analysis
KZN	KwaZulu-Natal
LEAP	Livelihood Empowerment Against Poverty
MNCs	Multi-National Companies
MoES	Ministry of Education and Sports
MoFPED	Ministry of Finance, Planning and Economic Development
MoGLSD	Minister/ Ministry of Gender, Labour and Social Development
NAP	National Action Plan
NAP-BHR	National Action Plan on Business and Human Rights
NGO	Non-Governmental Organization
NSCCL	National Steering Committee on Child Labour
OVCs	Orphans and Vulnerable Children
PSSB	Presidential Secondary School Bursary
PTA	Parent – Teachers Association
RECs	Regional Economic Communities

SADC	Southern African Development Community
SAGE	Social Assistance Grant for Empowerment
SAYP	Survey of Activities of Young People
SDG	Sustainable Development Goal
SGB	School Governing Body
SHS	Senior High School
UBOS	Uganda Bureau of Statistics
UPE	Universal Primary Education
USE	Universal Secondary Education

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For more information, please visit https://www.iser-uganda.org

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1.0 Introduction

Child labour remains one of the most persistent challenges to human development in the 21st century, effectively depriving millions of children of their potential, dignity, and fundamental rights.[1] Over the years, there has been significant progress globally: since 2000 the rate of child labour has reduced almost by half, from 245.5 million (16%) children aged 5 to 17 in 2000 to 137.6 million (7.8%) in 2024.[2] Those engaged in hazardous work also reduced from 170.5 million (11.1%) to 54 million (3.1%).[3]

Child labour has reduced from **245.5 million** in 2000 to **137.6 million** in 2024

16% in 2000 to **7.8%** in 2024

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At the beginning of 2020, despite global estimates of approximately 160 million children in child labour worldwide – with nearly half in hazardous work – all regions were registering progress.[4] Sub-Saharan Africa, however, has experienced a mixed result. While child labour worldwide fell significantly between 2000 and 2024, progress has recently stalled.[5] Sub-Saharan Africa is a significant outlier: unlike other regions, child labour in absolute terms has increased since 2012.[6] As of 2024, an estimated 87 million children in Africa are engaged in child labour, exceeding the combined total of all other regions.[7]

At the beginning of 2020 **160 million** children in child labour worldwide

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1 L Kiss and others *Violence against children and child labour in Uganda: What evidence exists?* Policy Brief (2023) 2; ILO & UNICEF *Child labour: Global estimates 2020, trends and the road forward* (2021) 16.

2 ILO & UNICEF *Child labour: Global estimates 2024, trends and the road forward* (2025), available at https://www.ilo.org/sites/default/files/2025-06/2024%20Global%20Estimates%20of%20Child%20Labour%20Executive%20Summary%20ENGLISH%20EMBARGOED.pdf (accessed 15 February 2025).

3 As above.

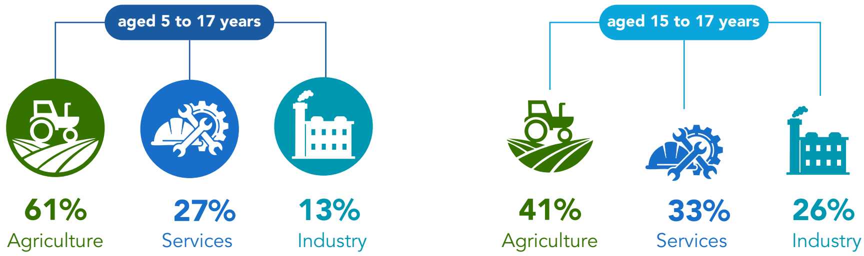
4 As above, (n 2).

5 ILO & UNICEF (n 2) 8-9; OM Musah 'Communicating child labour eradication to Africa against dwindling Western efforts at goal attainment' (2025) 1(6) UKR *Journal of Arts, Humanities and Social Sciences* 209 - 210

6 ILO & UNICEF (n 2) 27; RB Frempong *Child labour in Sub-Saharan Africa: Empirical evidence and new perspectives* unpublished PhD thesis, University of Bayreuth (2019) 16 & 99.

7 Stop Child Labour *Cooperating with the private sector in child labour free zones in Africa* (2017) 8; ILO & UNICEF (n 2) 21-24.

Agriculture remains the biggest contributor to child labour at 61% for children aged 5 to 17 years, followed by services at 27% and industry at 13%.[8] For children aged 15 to 17 years, agricultural contribution reduces to 41% while services increase to 33% and industry to 26%,[9] indicating a high employer preference for older children in the service and industry sectors.



The persistence of child labour points to a global failure to achieve Sustainable Development Goal (SDG) Target 8.7, which committed to ending child labour by 2025. Poverty, the absence of free and high-quality education, weak legal protections with weak enforcement, and the absence of universal social protection are regarded as the key drivers on the continent.[10]

In 2022, at the 5th Global Conference on the Elimination of Child Labour held in Durban, South Africa, delegates adopted the Durban Call to Action, committing to accelerate multi-stakeholder efforts to prevent and eliminate child labour; end child labour in agriculture; realise children's right to universal access to free, compulsory, quality, equitable and inclusive education; achieve universal access to social protection; and increase financing and international cooperation.[11]

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8 ILO & UNICEF (n 2) 8.

9 As above, 8-9.

10 M Dunne, S Humphreys & C Szyp 'Education and work: *Children's lives in rural sub-Saharan Africa*' in *Children's work in African agriculture* (2023) 85; UNICEF *Ending child labour through a multisectoral approach* (2021) 2 & 7, available at https://www.unicef.org/sites/default/files/2021-12/Child%20Labour%20Brief%20Dec%202021%20Final.pdf.

11 ILO & UNICEF (n 2) 40 & 53. The Durban Call to Action (2022) commits to: acceleration of multi-stakeholder efforts; ending child labour in agriculture; universal free and compulsory quality education; universal social protection; and increased financing and international cooperation.

Building directly upon this foundation, the 2026 6th Global Conference in Morocco culminated in the adoption of the Marrakech Global Framework for Action against Child Labour.[12] This newer framework does not replace the Durban commitments; rather, it operationalizes them in response to the global community missing the SDG Target 8.7. Recognizing that the 49 thematic pillars of the Durban Call to Action remain unfulfilled, the Marrakech Framework shifts the global strategy from a focus on political commitment to a mandate for strict legal enforcement and institutional accountability. It introduces rigorous monitoring mechanisms - such as the International Labour Organisation (ILO) Child Labour Observatory - while sharpening policy focus onto the root economic drivers of child labour, specifically advocating for adult living wages, supply chain due diligence, and targeted interventions in small-scale agriculture.

As a Pathfinder Country under Alliance 8.7 – the global coalition committed to achieving SDG Target 8.7 – Uganda formally joined in December 2018 when the Minister of Gender, Labour and Social Development (MoGLSD) wrote to the ILO Director General expressing Uganda’s commitment to take lead and devote extra effort towards eliminating child labour in all its forms by 2025.[13] However, as the Marrakech Framework later observed globally, this 2025 timeline proved overambitious. Despite these SDGs, legal, policy, and institutional commitments,[14] the persistence of child labour suggests a disjuncture between law and lived reality that continues to undermine both economic advancement and social order.

According to recent data, the proportion of children involved in child labour in Uganda rose from 38.5% in 2019/20 to 39.5% in 2021, with the highest rates found among children

[12] International Labour Organization *Marrakech Global Framework for Action against Child Labour* (2026) https://www.ilo.org/publications/marrakech-global-framework-action-against-child-labour (accessed 23 June 2026).

[13] ILO 'Uganda holds its Alliance 8.7 National Strategic Planning Workshop', available at https://www.ilo.org/ africa/technical-cooperation/accel-africa/uganda/WCMS_763347/lang--en/index.htm (accessed 16 June 2026). In December 2018, the Honourable Janat B Mukwaya, Minister of Gender, Labour and Social Development, wrote to the ILO Director General expressing Uganda's commitment to join Alliance 8.7 as a Pathfinder Country.

[14] ILO 'Uganda signs third decent work country programme', available at https://www.ilo.org/resource/article/uganda-signs-third-decent-work-country-programme (accessed 16 June 2026).

aged 5 to 11.[15] This is especially true for the agriculture[16] and extractive sectors,[17] particularly in the Albertine[18] and Busoga regions,[19] where the exploitation of children is sustained by structural poverty, weak regulatory enforcement, and informal economic structures.

The proportion of children involved in child labour in Uganda rose from **38.5%**in 2019/20 to **39.5%** in 2021

This study proceeds from the premise that piecemeal interventions, however well-intentioned, are no longer sufficient to address these systemic constraints. What is required is a clearer appreciation of what has worked elsewhere and why. The study examines data from targeted consultations in the Albertine and Busoga sub-regions – used as focal mirrors reflecting broader national dynamics – alongside the experience of Ghana, Kenya, and South Africa: jurisdictions that have grappled with child labour.

The study addresses the following research questions:

This study analyses data on the prevalence of child labour in Uganda's Albertine and Busoga sub-regions while exploring strategies implemented in other Sub-Saharan African countries, namely Kenya, Ghana, and South Africa to reduce child labour. Specifically, the research addresses the following questions:

1. What strategies have helped reduce or eliminate child labour in Ghana, Kenya, and South Africa?
2. What household and community actions help reduce child labour and protect children?
3. Which of these strategies can work effectively in Uganda in eliminating child labour?

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[15] US Department of Labor 2023 *findings on the worst forms of child labor: Uganda* (2024) 1.

[16] ILO 'Child labour in Uganda: The case of joining forces' (2024), available at https://www.ilo.org/resource/article/child-labour-uganda-case-joining-forces (accessed 16 February 2026).

[17] E Njieassam 'Child labour in artisanal and small-scale gold mines in Uganda: are legal protections adequate?' (2023) 67(1) *Journal of African Law* 54.

[18] ILO *Accelerating action for the elimination of child labour in Uganda's tea and coffee supply chain: ACCEL Africa Project* (February 2023) 1.

[19] K Hamidu, M Kibuukamusoke & T Ismail *A study on child labour and its gender dimensions in sugarcane growing in Uganda* (2019) 15.

The objectives of the research are:

1. To identify, analyse, and compare strategies and frameworks that have demonstrably reduced or eliminated child labour in Ghana, Kenya, and South
2. Africa.
   To examine household and community-level interventions that reduce incentives for child labour and strengthen child protection.
3. To determine which regional strategies are contextually appropriate to Uganda as a whole, with particular reference to the Albertine and Busoga regions as illustrative focal areas.

1.1 Scope of the Study

This study aims to provide a comprehensive and contextually grounded analysis of child labour elimination strategies. Its primary geographical concern is with the Albertine and Busoga regions of Uganda, used as focal mirrors through which broader national dynamics are examined. Beyond these areas, the study draws on a comparative analysis of Ghana, Kenya, and South Africa, whose legislative and programmatic approaches provide instructive benchmarks for Uganda as a whole. The research focuses on children aged 5 to 17 years, while also examining transitions into the youth labour market for those aged 18 to 30 years, recognising that early engagement in work can have lasting effects on human capital and adult economic outcomes.

1.2 Methodology

The study employed a mixed-methods research design, integrating document review with targeted qualitative data collection over a period of approximately five months (February to July 2026). This dual approach ensured that the legal and policy analysis was grounded in the practical socio-economic realities of the Albertine and Busoga regions, and facilitated an in-depth exploration of the experiences and perceptions of various stakeholders, including state actors, multinational corporations, and children.

1.2.1 Methods

The desk review involved a systematic analysis of the legal and policy landscape across Sub-Saharan Africa, with a specific focus on Ghana, Kenya, and South Africa. International human rights conventions and treaties, regional instruments, national court decisions, relevant legal opinions, case files, policy briefs, and reports from human rights organisations were reviewed. Documents were sourced from government archives, legal databases, NGOs, and academic publications, with themes coded systematically to facilitate cross-document comparisons.

1.2.2 Primary Data Collection

To capture nuanced real-world insights not available in published literature, the study utilises key informant interviews (KII). The primary tool is an interview guide facilitating open-ended dialogue with purposively selected experts, policymakers, and business and human rights practitioners in Uganda. This approach ensures that the final lessons for Uganda are grounded in both documented evidence and contemporary expert experience.

1.2.3 Ethical Considerations

The study adhered strictly to international ethical standards for research involving human subjects. Given the focus on child labour, the research prioritised the principle of 'the best interests of the child,' ensuring that no part of the data collection process causes further trauma or stigmatisation. Informed consent was obtained from all adult participants. All data was anonymised, and strict confidentiality protocols were maintained. Participants had the right to withdraw at any stage, maintaining a "do no harm" approach throughout.

1.3 Limitations of the study

While this study utilises a robust mixed-methods design, several methodological and data-related limitations must be acknowledged. First, there is a persistent scarcity of quantitative data regarding the worst forms of child labour other than hazardous work, such as trafficking and commercial sexual exploitation, which are clandestine and rarely captured by household surveys. Second, the study relies heavily on cross-sectional data, which limits the ability to establish definitive causality. Third, the approximately five-month study period, while more extensive than originally planned, still necessitates heavy reliance on desk reviews and a limited sample of stakeholder interviews that may not capture the full diversity of localised cultural norms across every district.

2.0 What is Child Labour?

The question of what constitutes child labour in international law emerges from a collection of mutually reinforcing frameworks.[20] These standards collectively identify child labour as work that is mentally, physically, socially, or morally dangerous to children and interferes with their schooling.[21]

The United Nations Convention on the Rights of the Child (CRC) provides the foundational human rights standard. Under Article 32, state parties recognise the right of the child to be protected from economic exploitation and from performing any work that is likely to be hazardous, interfere with the child's education, or be harmful to the child's health or physical, mental, spiritual, moral, or social development. CRC General Comment No. 20 further emphasises the state obligation to implement these protections through national legislation.[22]

ILO Convention No. 138 on Minimum Age establishes the primary chronological boundaries for legal employment, fixing the minimum age at not less than the age of completion of compulsory schooling and in any event not below 15 years,[23] subject to limited flexibility for developing states who may specify an initial minimum age of 14 years.[24] Light work is permitted for children aged 13 to 15,[25] while work that is hazardous by its nature is strictly prohibited for anyone under 18.[26]

ILO Convention No. 182 on the Worst Forms of Child Labour defines these intolerable practices as including all forms of slavery, debt bondage, forced labour, the use of children

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[20] EV Edmonds *Defining child labour: A review of the definitions of child labour in policy research* (2008) 1; J Bol 'Using international law to fight child labor: A case study of Guatemala and the Inter-American System' (1997) 13 *American University International Law Review* 1139.

[21] Edmonds (n 20); UN Human Rights Council 'Worst forms of child labour: assessing progress and persisting challenges: Report of the Special Rapporteur on contemporary forms of slavery, Tomoya Obokata' (10 July 2025) UN Doc A/HRC/60/28; M Dahlén *The ILO and child labour* (2008) 27-28.

[22] UN Human Rights Council (n 21); Dahlén (n 21). See also CRC General Comment 20 (2016) on the implementation of the rights of the child during adolescence, UN Doc CRC/C/GC/20.

[23] ILO Minimum Age Convention 138 of 1973, art 2(3).

[24] Minimum Age Convention 138 of 1973, art 2(4).

[25] Minimum Age Convention 138 of 1973, Art 7(1)-(2). Light work permitted for children aged 13-15.

[26] Minimum Age Convention 138 of 1973, art 3(1); ILO Worst Forms of Child Labour Convention 182 of 1999, art 3(d). See Edmonds (n 20) 18-19.

for prostitution, and other illicit activities. ILO Recommendation No. 190 provides a detailed list of characteristics that constitute hazardous work.[27]

International case law has established that state responsibility extends beyond direct state action.[28] The Inter-American Court of Human Rights, in Velásquez Rodríguez,[29] established that a state can be held responsible for exploitative actions of private individuals if it fails to show due diligence. In Aloeboetoe,[30] the Court recognised that effective remedies may require ensuring continued access to education.

Importantly, African regional jurisprudence has reinforced these obligations. In 2014, the African Committee of Experts on the Rights and Welfare of the Child (ACERWC) issued a landmark decision in the matter of the *Centre for Human Rights (University of Pretoria) and La Rencontre Africaine pour la Défense des Droits de l'Homme (RADDHO) v. Government of Senegal).*[31] The case concerned approximately 100,000 talibé children in Senegal who were forced by teachers to beg on the streets for long hours. The ACERWC found the Senegalese government accountable even though the exploiters were non-state actors, establishing that a state's failure to effectively enforce its own laws to protect children from private exploitation violates Articles 4, 5, 11, 14, 15, 21, and 29 of the African Charter on the Rights and Welfare of the Child (ACRWC). This decision reinforces the principle that states bear a positive duty to protect children from exploitation by third parties.[32]

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27 ILO Worst Forms of Child Labour Convention 182 of 1999, art 3; ILO Worst Forms of Child Labour Recommendation 190 of 1999, para II(3)(a)-(e). See Edmonds (n 20) 19-20.

28 Bol (n 20) 1212-1213.

29 *Velásquez Rodríguez v Honduras* (Preliminary Objections) IACHR (26 June 1987) Ser C No 1, para 3.

30 *Aloeboetoe v Suriname* (Reparations and Costs) Inter-American Court of Human Rights (10 September 1993) Ser C No 15. See Bol (n 20) 1221.

31 Decision No. 003/Com/001/2012.

32 *Centre for Human Rights (University of Pretoria) and La Rencontre Africaine pour la Défense des Droits de l'Homme (RADDHO) v Government of Senegal, African Committee of Experts on the Rights and Welfare of the Child, Decision No 003/Com/001/2012, decided April 2014, published May 2015. The Committee found Senegal in violation of arts 4, 5, 11, 14, 15, 21 & 29 of the African Charter on the Rights and Welfare of the Child. See AfricLaw 'Promoting and protecting children's rights in Africa: Case of the talibés of Senegal' (31 May 2018), available at https://africlaw.com/2018/05/31/promoting-and-protecting-childrens-rights-in-africa-case-of-the-talibes-of-senegal/ (accessed 16 June 2026).*

Recent international assessments reiterate that child labour is defined by its contravention of these established conditions,[33] and the legal framework is now viewed through a mainstreaming approach, integrating elimination of child labour into broader development goals.[34]

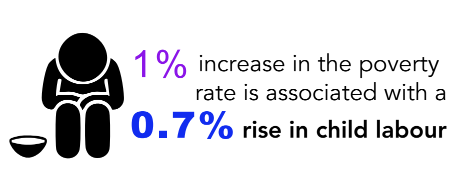
Within Africa, the ACRWC explicitly prohibits the economic exploitation of children.[35] Regional interpretations distinguish between "child labour" and "child work," the latter being salutary family activities. When activities interfere with school attendance or exceed thresholds – such as 1 hour per week for children aged 5-11 or 14 hours for those aged 12-14 – they are formally classified as child labour.[36]

2.1 Major Drivers of Child Labour

The persistence of child labour in Africa is driven by a complex intersection of structural, economic, social, and environmental factors;

2.1.1 Poverty and the "Luxury Axiom"

Widespread poverty is the fundamental economic driver.[37] Statistical estimates suggest that a 1% increase in the poverty rate is associated with a 0.7% rise in child labour.[38] For many households, child labour is a survival strategy to buffer against uninsured shocks such as the death



[33] UN Human Rights Council (n 21) 2.

[34] As above; SDG Target 8.7.

[35] African Charter on the Rights and Welfare of the Child (1990) art 15, read together with art 11. See CO Kaniye-Ebeku 'International and regional legal and policy framework on child labour' (2024) *International Journal of Law and Society* 245.

[36] OM Musah 'Communicating child labour eradication to Africa against dwindling Western efforts at goal attainment' (2025) 1(6) *UKR Journal of Arts, Humanities and Social Sciences* 210 & 213. ILO/UNICEF standard thresholds are 1 hour per week for children aged 5-11 and 14 hours per week for children aged 12-14.

[37] Frempong (n 6) 16 & 99; H Liang 'A study on Africa child labour issues and recommendations' (2025) *Advances in Social Science, Education and Humanities Research* 824

[38] Liang (n 37) 824.

of a breadwinner or crop failure, and climate-induced disasters which frequently destroy family livelihoods, pushing children into the workforce as a negative coping mechanism.[39]

2.1.2 The Education Gap

While many African countries have abolished primary school fees, indirect costs – uniforms, transport, and Parent – Teachers Association (PTA) levies – remain prohibitive. The poor quality of rural education leads parents to perceive farming or vocational apprenticeship as a more rational economic model than formal schooling. At least 6 in 10 adolescents in child labour are currently out of school.[40]

2.1.3 Informality and Unregulated Markets

Approximately 86% of jobs in Africa are in the informal economy, largely beyond the reach of labour inspectors and government regulation.[41] This creates high demand for low-cost labour in sectors like artisanal mining and small-scale agriculture.

86% of jobs in Africa are in the **informal economy**

2.1.4 Climate Change, Conflict, and Disease Outbreaks

Africa is home to a high share of the world's fragile and conflict-affected countries. Equally significant is the role of disease outbreaks. The COVID-19 pandemic dramatically accelerated child labour through two compounding mechanisms: the prolonged closure of schools, which removed the protective effect of education and school meals for millions of children; and the catastrophic loss of household income during lockdowns, which left families with no option but to turn to child labour for survival. This dynamic is extensively documented in the joint report by ISER, Human Rights Watch, and Friends of the Nation, in which working children in Uganda described carrying heavy bags of ore at gold

[39] Stop Child Labour (n 7) 8; ILO & UNICEF (n 2) 27.

[40] Liang (n 37) 824; BP Mani 'Child labour laws and their enforcement in the informal sector: A critical analysis of implementation challenges and policy effectiveness' (2024) 1(1) *Indian Journal of Jurisprudence and Reviews* 12-13; ILO & UNICEF (n 2) 27. At least 6 in 10 adolescents in child labour are currently out of school.

[41] E Njieassam (n 17) 54.

mining sites, crushing ore with hammers, breathing in dust and fumes, and handling toxic mercury – activities directly attributable to the economic devastation of the pandemic.[42]

2.1.5 Lack of Child-Sensitive Social Protection

Weak or non-existent social protection systems leave families without a financial buffer against economic shocks.[43] Where social protection programmes are poorly designed, too narrowly targeted, or carry high eligibility thresholds, they fail to reach the households most likely to resort to child labour. This structural gap is particularly acute in Uganda, where the existing Social Assistance Grant for Empowerment (SAGE) programme covers only a small fraction of vulnerable households and carries an eligibility age cap of 80years that far exceeds national life expectancy.[44]

2.2 Continental Strategies and Their Effectiveness

Africa has adopted several ambitious frameworks to combat these drivers, though effectiveness varies significantly across jurisdictions.

2.2.1 Policy Frameworks

The African Union (AU) has spearheaded the Ten-Year Action Plan on Child Labour (2020-2030) and integrated elimination targets into both Agenda 2063 and Agenda 2040.[45] These frameworks emphasise a 'whole-of-society' approach, linking child protection to universal education and social protection.

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[42] Human Rights Watch, Initiative for Social and Economic Rights (ISER) & Friends of the Nation *'I must work to eat': Covid-19, poverty, and child labor in Ghana, Nepal, and Uganda* (26 May 2021), available at https://iser-uganda.org/wp-content/uploads/2022/07/I_Must_Work_to_Eat.pdf (accessed 11 April 2026). Researchers interviewed 81 children aged 8-17 in Uganda, Ghana and Nepal. Children in Uganda described carrying heavy bags of ore at gold mining sites, crushing ore with hammers, breathing dust and fumes, and handling toxic mercury.

[43] UNICEF & ILO *The role of social protection in the elimination of child labour: Evidence review and policy implications* (2022) 19; UNICEF (n 10) 7.

[44] Initiative for Social and Economic Rights (ISER) & Research & Action for Income Security (RAISE), 2026, Budgeted Out: Government Promise to Older Persons Broken; An Analysis of the 2026/27 National Budget.

[45] African Union Commission *Agenda 2063: The Africa we want – framework document (2015) 87 & 157; ACERWC Secretariat Report of the Child Rights Symposium with Regional Economic Communities, 26-27 June 2025* (2025) 14.

2.2.2 Regional Economic Communities (RECs)

Communities like ECOWAS, SADC, and IGAD have established regional action plans and codes of conduct to harmonise legal standards across borders. IGAD recently adopted a child protection framework that includes meaningful child participation in policy design.[46]

2.2.3 Child Labour Free Zones (CLFZs)

The CLFZ model focuses on area-based elimination regardless of sector.[47] A notable example is the West Nile CLFZ in Uganda, where collaboration between teacher unions, NGOs, and private coffee companies returned 500 children to school within two years.[48]

2.2.4 Corporate Accountability

Multinational companies are increasingly engaged through Child Labour Monitoring and Remediation Systems (CLMRS).[49] Uganda's National Action Plan on Business and Human Rights (NAP-BHR) – the second plan adopted by any African country – explicitly identifies child labour as a major issue in agriculture, domestic services, and extractive industries, and requires businesses to undertake human rights due diligence through comprehensive impact assessments.[50] However, corporate accountability mechanisms remain largely focused on export-oriented supply chains and often fail to address the broader informal sector,[51] and enforcement is hampered by a severe shortage of labour inspectors.

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45 African Union Commission *Agenda 2063: The Africa we want – framework document (2015) 87 & 157; ACERWC Secretariat Report of the Child Rights Symposium with Regional Economic Communities, 26-27 June 2025* (2025) 14.

46 ACERWC Secretariat (n 45) 14.

47 Stop Child Labour (n 7) 10 & 12.

48 Stop Child Labour (n 7) 34.

49 J Engelbertink & A Kolk 'Multinational enterprises and child labour: Insights from supply-chain initiatives in different sectors' (2021) 6(4) *Journal of Modern Slavery: A Multidisciplinary Exploration of Human Trafficking Solutions* 94-95.

50 Ministry of Gender, Labour & Social Development *The national action plan on business and human rights* (2021) 20.

51 Liang (n 37) 824; K Abdulkareem, SO Ehiane & NI Nnamezie 'Reflecting on the trend of child labour in South Africa' (2021) 8(12) *African Journal of Democracy and Governance* 74.

3.0 Uganda 

Uganda's legal regime against child labour is founded on Article 34(4) of the Constitution,[53] which protects children from social and economic exploitation. The Constitution defines a child as any person below the age of 18,[54] with an exception to 16 years for light employment not harmful to the child.[55] These protections are further elaborated in the Children Act, which establishes the best interests principle[56] and prohibits harmful employment; the Employment Act, which governs working hours for children;[57] the Education Act, which provides for compulsory primary education;[58] and the Occupational Safety and Health Act.[59]

The framework extends to specialised criminal and sectoral laws including the Penal Code Act,[60] the Prevention of Trafficking in Persons Act,[61] and the Mining and Minerals Act, which has the eradication of child labour as one of its objectives and provides for revocation of mineral rights where the holder employs child labourers.[62] Uganda has also ratified ILO Conventions No. 138 and No. 182,[63] the CRC and ACRWC.[64]

These laws, however, contain several loopholes. The Education Act mandates school attendance only until age 13, creating a three-year gap before children can legally work at 16.[65] Minimum age protections do not apply to children working without a formal employment relationship, leaving most children in subsistence agriculture and domestic

[52] *Africa tripartite regional consultation on child labour: Final report in preparation of the sixth global conference on the elimination of child labour* (Morocco, 2026) (2025) 2.

[53] Constitution of the Republic of Uganda, 1995, art 34(4).

[54] Art 257(c).

[55] Art 34(5).

[56] Children Act Cap 62, sec 3.

[57] Employment Act Cap 226, sec 31.

[58] Education (Pre-Primary, Primary and Post-Primary) Act Cap 247, sec 11(3).

[59] Occupational Safety and Health Act Cap 231, secs 82-93.

[60] Penal Code Act Cap 128, sec 228.

[61] Prevention of Trafficking in Persons Act Cap 131, sec 4.

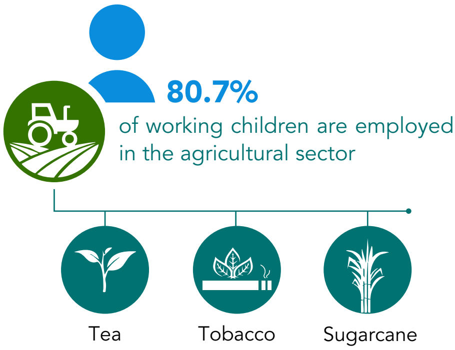
[62] Mining and Minerals Act Cap 159, sec 2(o) & sec 158(d).

[63] ILO Convention No 138 ratified 25 March 2003; ILO Convention No 182 ratified 21 June 2001.

[64] UN Convention on the Rights of the Child: signed 17 August 1990; ratified 16 September 1990. African Charter on the Rights and Welfare of the Child: signed 16 February 1992; ratified 17 August 1994.

[65] Njieassam (n 17) 55-56. The Education Act mandates school attendance only to age 13 (completion of primary school), creating a gap before the minimum working age of 16 under the Employment Act.

service without legal recourse.[66] Uganda's NAP-BHR acknowledges child labour as a major issue across agriculture, domestic services, and extractive industries,[67] yet did not adopt specific measures addressing root causes.[68] Enforcement is split between the MoGLSD and local governments, with only 180 labour inspectors for a workforce of over 18 million.



The nature of children's work in Uganda is predominantly rural and agricultural. Over 80.7% of working children are employed in the agricultural sector, often as unremunerated family labourers.[69] Children are frequently found cultivating sugarcane, tobacco, and tea, or performing dangerous tasks in extractive industries.[70] The burden borne by these children constitutes a triple burden of work, household labour, and schooling.[71]

Structural poverty is a significant predictor of child labour.[72] The COVID-19 pandemic exacerbated these vulnerabilities, as school closures and income losses pushed more children toward hazardous work – a dynamic extensively documented by ISER and Human Rights Watch in their joint report.[73] Children who work are significantly more likely to drop out of school, permanently impairing their lifetime employment and pay.[74] Once a child enters paid employment, it becomes increasingly difficult to reintegrate them into formal schooling.[75] Uneducated child labourers become unskilled adult workers forced to rely on their own children's labour to meet subsistence needs.[76]

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66 Uganda Bureau of Statistics & Understanding Children's Work (UCW) Programme *Understanding children's work and youth employment outcomes in Uganda* (2014) 20.

67 Ministry of Gender, Labour & Social Development (n 50) 20 & 25.

68 Ministry of Gender, Labour & Social Development (n 50) 25.

69 UBOS & UCW (n 66) 21; T Mwebaze *Extent and determinants of child labour in Uganda* (2007) 16.

70 UBOS & UCW (n 66) 28; US Department of Labor (n 15) 1.

71 ILO & UNICEF (n 2) 62; UBOS & UCW (n 66) 47.

72 UBOS & UCW (n 66) 47

73 Human Rights Watch and others (n 42). The report documents children in Uganda's Moroto, Buikwe, and Kampala districts working in gold mining, quarrying, maize mills, and sugarcane fields following the COVID-19 lockdowns.

74 D Haguma *Child labour and the wellbeing of children: The law and practice in Uganda* (2013) 3 & 33.

75 Mwebaze (n 69) 5.

76 Mwebaze (n 69) 5.

3.1 The Situation in the Busoga Sub-region and the Albertine Region

The data informing this report draws primarily from the Albertine and Busoga regions, which are one of the focal areas for the Advancing Respect for Human Rights by Businesses in Uganda (ARBHR) project – an EU-funded initiative implemented by Enabel in partnership with ISER, other NGOs and the MoGLSD, launched in November 2024. ISER focuses on efforts towards elimination of child labour in the agriculture and extractives supply chains. The ARBHR project targets these regions because of their high concentration of business-related human rights abuses, including child labour in sugarcane, rice, tobacco, and artisanal mining sectors.[77] While the findings from these regions serve as illustrative focal points, the lessons and recommendations derived from this study are intended for Uganda as a whole.

A gold mining site in Budde Village, Bugiri District

[77] Enabel, ISER & Ministry of Gender, Labour and Social Development *Advancing respect for human rights by businesses in Uganda (ARBHR): Project overview* (2024). EU-funded, , launched November 2024. Focal regions: Busoga (Iganga, Mayuge, Bugiri, Bugweri), Albertine (Hoima, Kikuube, Masindi, Kiryandongo) and Kampala Metropolitan. See https://www.enabel.be/country/uganda/ (accessed 16 June 2026).

The Busoga sub-region, which is composed of 11 districts and one city accounts for up to 45% of children from poor households involved in work.[78] The sub-region is characterised by labour-intensive economic activities that drive high demand for underage workers, particularly in sugarcane and rice plantations.[79] Children in Busoga are frequently documented performing dangerous tasks such as cutting and loading heavy sugarcane, scaring birds in rice fields, and working in waterlogged rice paddies.[80] The sub-region also hosts artisanal gold mining sites where children are exposed to mercury and other hazardous conditions.

The Albertine or Bunyoro region, covering 8 districts and one city faces a severe child labour crisis, with a reported prevalence of 26% in Masindi district alone.[81] Agriculture accounts for 84% of working children in this region,[82] with particular concentration in tobacco and tea cultivation. Children as young as 12 are involved in preparing land and harvesting tobacco, exposing them to harmful fumes.[83] Those in the tea sector perform strenuous tasks such as carrying loads up to 24 kilograms and face pesticide exposure.[84] The region also has high involvement in stone quarrying and sand mining.[85]

A mother & her children harvesting sugarcane at a sugarcane plantation

[78] R Luwangula *Final evaluation of 'Eradicating child labour in Uganda' project: Final report* (2023) vi; Terre des Hommes Netherlands *Uganda factsheet* 2025 (2025) 2, available at https://int.terredeshommes.nl/uploads/e755c4ba-uganda-factsheet-2025.pdf (accessed 17 March 2026).

[79] Luwangula (n 78) 11 & 38.

[80] Luwangula (n 78) 11-12 & 19.

[81] Masindi District Local Government *The district action plan to eliminate child labour* (2023) 4 & 9.

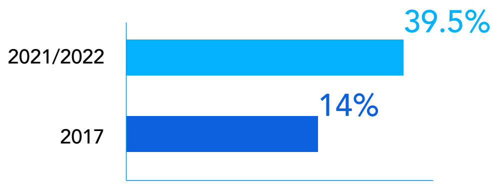
[82] Masindi (n 81) 9 & 15.

[83] Masindi (n 81) 42-43.

[84] Masindi (n 81) 43.

[85] Masindi (n 81) 4.

The prevalence of child labour in Uganda has increased markedly: within five years, numbers rose from 14% in 2017 to 39.5% by 2021/2022.[86] The National Population and Housing Census 2024 reinforces this, with structural poverty cited as a significant predictor – 56% of children live in multidimensional poverty.[87] The HIV/AIDS epidemic has left a legacy of orphanhood and child-headed households,[88] and the high cost of education despite ostensibly free tuition,[89] cultural norms that view agricultural work as traditional socialisation and lack of child sensitive social protection continue to fuel the crisis.



The prevalence of child labour in Uganda has increased markedly

56%
of children live in multidimensional poverty

3.2 Efforts to End Child Labour

Uganda has deployed several key instruments to address child labour, including the National Child Labour Policy (2006), the Employment of Children Regulations (2012), and the Second National Action Plan for the Elimination of Child Labour (NAP II, 2020/21-2024/25), which aimed to reduce child labour to 4% by 2025. That target has not been achieved; the US Department of Labour assessed Uganda's progress as only "minimal advancement" in 2023.[90] The following factors explain this outcome.

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86 ILO (n 16) 2; Mwebaze (n 69) 22.

87 Uganda Bureau of Statistics *National population and housing census 2024: Final report vol 1 (Kampala, 2024) 281; UBOS Multidimensional poverty index 2024* (Kampala, 2026), available at https://www.ubos.org/wp-content/uploads/publications/03_2026MPI_NPHC_2024_26_03_ED.pdf (accessed 16 June 2026).

88 Terre des Hommes Netherlands (n 78) 2; Kiss and others (n 1) 1.

89 US Department of Labor (n 15) 2; Kiss and others (n 1) 1.

90 Ministry of Gender, Labour & Social Development *Second national action plan for the elimination of child labour (NAP II, 2020/21-2024/25)* (2021). The NAP II was launched by President Museveni on International Labour Day with a target to reduce child labour from 22.8% to 4% by 2025. US Department of Labor (n 14) 1 (assessing Uganda as showing 'minimal advancement' in 2023).

Inefficiency of Poverty Alleviation Initiatives

Uganda's economy is largely agrarian, with 33.1% of households engaged in subsistence production.[91] Despite successive poverty alleviation programmes,[92] approximately 27% of households remain in multidimensional poverty.[93] Such conditions force poor households to push their children into child labour for survival.[94] An officer from a sugar miller, citing challenges faced even as they try to curb child labour on out grower plantations, underscored the issue of poverty thus;

> *Another challenge is the farming community. They are very poor. Someone finds it cheaper to use his family as labour. And you really have no mandate to stop them and say, don't use this child, or something like that. [Also], we cannot supervise everything that out growers do. So, at the end of the day, you find children, because his family cannot afford meals, or other basic necessities.*[95]

However, it is not appropriate for sugar millers to claim that they lack the mandate to stop children from engaging in child labour. Uganda's NAP-BHR singles out child labour as one of the major human rights violations by business operations and mandates them to undertake due diligence to eliminate human rights abuses such as child labour. On several occasions, the business community, especially the sugar millers, have been capacitated on matters of business and human rights. Additionally, poverty has also been contextualised in instances of child headed families;

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[91] Uganda Bureau of Statistics *Uganda national household survey* 2019/2020 (Kampala, 2021) 29, available at https://www.ubos.org/wp-content/uploads/publications/09_2021Uganda-National-Survey-Report-2019-2020.pdf (accessed 11 April 2026).

[92] J Simon, B Wakwale & J Oloba 'Government poverty alleviation programs and poverty reduction in Uganda: Evidence from Mbale District' (2025) 5 *International Journal of Advanced Multidisciplinary Research and Studies* 591.

[93] UBOS (n 87).

[94] UBOS (n 87).

[95] An interview with an official of a sugar miller held on 10th June 2026.

> *We also have an issue with children who are parents. And you actually see that that is what they do [engage in child labour for survival]. Like they are heads of homes, and yet they are children. Children being fathers. It's unfortunate, and it's a bit complex. Someone is the breadwinner, and yet they are also babies. How do you deal with that?*[96]

This points to weaknesses within the traditional and state systems of social protection to offer support to such children and shield them from carrying huge obligations at a young age.

Low Levels of Social Protection Coverage

Despite high poverty levels and incidents of child – headed families, social security coverage remains extremely low.

The government's SAGE programme provides a monthly grant of
UGX 25,000
to persons aged
80 years and above[97]

This grant is inadequate to sustain a household with young children, and the eligibility age of 80 years means few beneficiaries are alive to receive it, given that Uganda's average life expectancy is 68.2 years.[98] Furthermore, efforts to rescue children from child labour are frustrated by the absence of adequate social protection alternatives, as one civil society actor described:

> *Remember, our social protection systems are not strong as a country. One time we encountered a person who was transporting 21 children on a truck and we attempted to prosecute him for child trafficking. He was related to all the children in one way or another. The parents were saying that the man (driver) was helping us. Now we wanted to add the parents as co-accused. But then you have 21 children who will need homes or families to stay in [if you undertake this process] – which we don't have as a country.*[99]

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96 Interview with an Official of the MoGLSD held on 4th June 2026.

97 Uganda Bureau of Statistics (n 87) xxi. The SAGE programme provides UGX 25,000 per month to persons aged 80 years and above.

98 Uganda Bureau of Statistics (n 87) 281. Uganda's average life expectancy is 68.2 years, meaning the SAGE eligibility threshold of 80 years exceeds life expectancy by over a decade.

99 Interview with a CSO actor held in May 2026

The only homes available are babies' homes owned and operated by the private actors for those aged 0 – 48 months which may not benefit the children above that age.[100] This is in addition to remand homes owned and operated by the state but strictly for children in conflict with the law. Since engagement in child labour does not amount to conflict with the law, such homes are also not beneficial to children engaged in child labour.

Subsidised Education Programmes Window-Dressed as Free Education

In 1997 the government introduced Universal Primary Education (UPE), followed by Universal Secondary Education (USE) in 2007. These initially boosted enrolment but their effectiveness is limited by high dropout rates and a primary completion rate of only 52.7%.[101] While the law prohibits school fees in UPE and USE schools, it permits "voluntary contributions" for emergencies.[102] In UPE, the government currently allocates only UGX 20,000 per learner per year as capitation (operation) grant for the day to day running of the school – well below the National Planning Authority's recommended threshold. A District Inspector of Schools observed:

> *Because when you look at the money given to a learner to a particular school, you find that it's very little; it cannot sustain the school. The school might not be in position to cater for all other essentials of the school and then add on feeding the learners. Therefore, the government should increase the capitation grant.*[103]

Schools consequently turn to parents to fill the gaps through unregulated non-tuition fees, contributing to dropout particularly among children from poor backgrounds. Uganda Bureau of Statistics (UBOS) has reported that 6 out of 10 learners are dropping out of school due to the high cost of education.[104]

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100 Government of Uganda, The Approved Schools (Babies Homes) Rules, SI No. 9 of 1991

101 National Planning Authority *Comprehensive evaluation of the Universal Primary Education (UPE) policy – thematic report 5: Financing and costing of UPE* (2018). Recommended capitation grant: UGX 63,546 (urban); UGX 59,503 (rural). Current allocation: UGX 20,000. See also Auditor General *Value for money audit report on UPE for the year 2023* (2023).

102 Education (Pre-Primary, Primary and Post-Primary) Act Cap 247, secs 3, 6 & 10. Sec 10(1)-(2) permits 'voluntary contributions' for emergencies.

103 An Interview with a District Inspector of Schools held on 4th March 2026.

104 Uganda Bureau of Statistics (n 91) 29. UBOS reports 6 out of 10 learners dropping out due to high education costs.

The capitation grant shortfall is documented by both the National Planning Authority and the Auditor General.[105]

Weak Enforcement of Laws and Policies

Despite Uganda's compliance with international human rights obligations through enacted laws,[106] the legislative framework remains inadequate. As the second African country to adopt a NAP – BHR, Uganda set out to implement the Children's Rights and Business Principles;[107] however, given the high levels of informality, a framework specifically addressing child labour in supply chains would have been more effective. A senior labour officer described the enforcement gap:

> *The truth is we don't have the statistics at the moment, but the fact remains that some children are in child labour engagement… And the reason we don't have the statistics is that we've not been having the funding to cater for child labour mitigation. And at district level they would say they are going to fund from local revenue which local revenue never comes… This office here is the least funded office amongst all the sectors in the department.*[108]

In addition to the limited number of labour officers, even where there are few who attempt to act, the enforcement is further frustrated by the uncooperative conduct of the business operators especially the plantation farmers:

> *'They [labour officers] are not enough. Some districts do not have labour officers. But we are working with public service to recruit more. [Also], sometimes we are unable to conduct monitoring visits because plantations are guarded and you can't access them. You find people with pangas, and some of them are drug addicts. And when you come with police, they run away and you are frustrated.'*[109]

105 Auditor General (n 97); National Planning Authority (n 97).

106 See the Employment Act Cap 226 and the attendant regulations.

107 Ministry of Gender, Labour & Social Development (n 50) 25.

108 Interview with a Senior Labour Officer, District Labour Office held on 4th March 2026.

109 Interview with a MoGLSD official supra.

4.0 Comparative Review of Other Jurisdictions

This section examines the experience of Kenya, Ghana, and South Africa in confronting child labour. The three jurisdictions were selected because they share structural similarities with Uganda – agrarian economies, high rates of informality, and colonial legal inheritances – while having pursued distinct approaches to child labour elimination. South Africa's social protection and education reforms offer the clearest evidence of results, while Ghana's experience provides instructive lessons on both the potential and the limits of well-designed strategies when underlying poverty is not adequately addressed, and Kenya illustrates the transformative but incomplete impact of free education and cash transfers.

4.1 Kenya 

In Kenya, agriculture remains the cornerstone of the economy.[110] Three out of every 10 children in Kenya are engaged in work for survival,[111] often a direct consequence of poverty and weak social protection systems.[112] Many of these children are engaged in physically demanding and hazardous activities, risking exposure to toxic substances, agricultural chemicals, and dangerous tools.

4.1.1 Trends over Time

Data from the last two decades indicates a notable downward trend. In 1999, surveys estimated that 1.9 million children were involved in labour.[113] The 2019 Kenya National Bureau of Statistics Census reported that 8.5% of children aged 5 to 17 (approximately 1.37 million) were engaged in labour.[114]

In 2019 **8.5%** ofchildren aged 5 to 17 **(approximately 1.37 million)** were engaged in labour.

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[110] Kenya National Bureau of Statistics (KNBS) *Kenya census of agriculture pilot report for 2024/2025* (Nairobi, 2024); Ministry of Mining, Blue Economy and Maritime Affairs *Kenya mining investment handbook* 17.

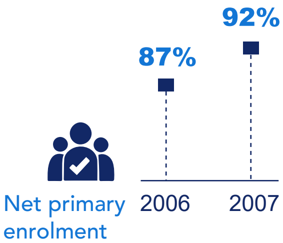
[111] Terre des Hommes *Kenya factsheet 2025* (2025) 3, available at https://int.terredeshommes.nl/uploads/2fd0fa0a-kenya-factsheet-2025.pdf (accessed 18 March 2026).

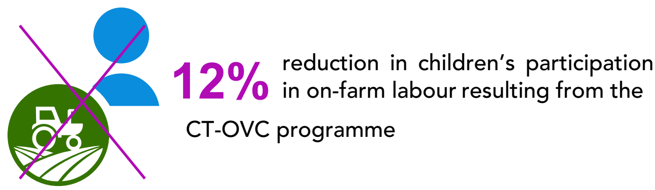
[112] UNICEF 'Let's end child labour in Kenya' (10 June 2021), available at https://www.unicef.org/kenya/stories/lets-end-child-labour-kenya (accessed 18 March 2026).

[113] BW Maina *Child labour and its determinants in Kenya* Discussion Paper No 157 (2013) 2. See KNBS *Kenya integrated household budget survey: Child labour analytical report* (2008).

[114] KNBS Census (2019), cited in US Department of Labor *2023 findings on the worst forms of child labor: Kenya* (2024) 1-2, available at https://www.dol.gov/sites/dolgov/files/ILAB/child_labor_reports/tda2024/Kenya.pdf (accessed 18 March 2026).

This downward trend is attributable in significant part to the introduction of Free Primary Education (FPE) in 2003, which caused net primary enrolment to surge from 87% in 2006 to 92% in 2007, directly reducing the availability of children for daytime labour.[115] The Cash Transfers to Orphans and Vulnerable Children (CT-OVC) programme demonstrated a measurable impact, with a statistically significant 12% reduction in children's participation in on-farm labour and increased secondary school enrolment for older children in beneficiary households.[116]





However, regional and sectoral disparities remain stark. Child labour incidences reach as high as 30% to 47% in arid counties like Mandera and Marsabit.[117] The agricultural sector continues to be the largest employer of working children,[118] and there are reports that the worst forms, including commercial sexual exploitation, increased following school closures during the COVID-19 pandemic.[119]

4.1.2 The Legal Framework

The 2010 Constitution of Kenya provides for the protection of every child from abuse, neglect, harmful cultural practices, and hazardous or exploitative labour,[120] with the child's

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115 A Githitho-Muriithi 'Education for all and child labour in Kenya: A conflict of capabilities?' (2010) 2(2) *Procedia: Social and Behavioral Sciences* 4615.

116 US Department of Labor / Center for Learning on Evaluation and Results (CLEAR) 'Cash transfer programme productive activities and labour supply: Evidence from a randomised experiment', available at https://clear.dol.gov/study/cash-transfer-programme-productive-activities-and-labour-supply-evidence-randomised-experiment (accessed 18 March 2026). The study found a statistically significant 12% reduction in on-farm labour for children aged 10-15 in CT-OVC beneficiary households, and increased secondary school enrolment for children aged 12-18.

117 US Department of Labor (n 116) 1

118 As above.

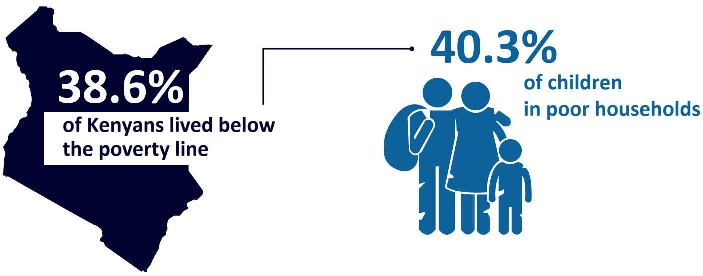
119 As above, 1-2.

120 Constitution of Kenya, 2010, art 53.

best interests as paramount.[121] The Children Act reiterates the best interests principle[122] and prohibits child labour.[123] The Employment Act provides that a child below the age of 13 is excluded from employment altogether, while children between 13 and 16 may engage only in light work not prejudicing their health or schooling.[124] Night work is prohibited for all children.[125]

4.1.3 Key Drivers of Child Labour in Kenya

Poverty remains the primary driver; in 2022, approximately 38.6% of the population lived below the poverty line, with 40.3% of children in poor households.[126] The HIV/AIDS pandemic has created an orphanhood crisis, leaving an estimated 1.7 to 2 million children orphaned,[127] many of whom become heads of households.[128] Climate change has exacerbated vulnerabilities in arid and semi-arid lands, where severe droughts force children into livestock herding.[129]



121 Art 53(2).

122 Children Act of Kenya, 2022, sec 8.

123 Sec 18 of the Children Act of Kenya, 2022.

124 Employment Act (Kenya) Cap 226, Part VII, secs 52-65.

125 Sec 53 (minimum ages) & sec 60 (night work prohibition 6.30 pm–6.30 am) of the Employment Act (Kenya) Cap 226.

126 AB Osaiyuwu *Exploring child labour: An examination of child trading in Nigeria* unpublished PhD thesis, Anglia Ruskin University (2023) 29-30 & 42; Ministry of Labour and Social Protection *National action plan for the elimination of child labour 2024-2028* (2024) 12.

127 A Githitho-Muriithi (n 115) 4613; Ministry of Labour (n 126) 12.

128 *National policy on the elimination of child labour (27 January 2025) 10-11; N Thomas Child labour and the violation of child rights: A case study of Kenya* (2013) 12.

129 P Onyango *The role of advocacy against child labour* CMI Report (2015) 8; CA Suda 'The invisible child worker in Kenya: The intersection of poverty, legislation and culture' (2001) 10(2) *Nordic Journal of African Studies* 163-164.

4.1.4 Strategies for the Elimination of Child Labour in Kenya

Policy Formulation

Kenya's strategy for the elimination of child labour includes the National Policy on the Elimination of Child Labour (2015) and the National Action Plan (NAP II) 2024-2028, aimed at mainstreaming child labour interventions into county-level planning.[130] The Kenya Institute for Public Policy Research and Analysis (KIPPRA) has provided additional analytical support on arid-area approaches.[131]

Strategic Litigation and Public Prosecution of Perpetrators of Child Labour

Enforcement of child labour laws has been demonstrated in two landmark cases. In *Joseph Maraka Adoro (a minor) v. Paul Njogo Kihara,*[132] the court ruled that work becomes illegal child labour the moment it interferes with the child's right to education and safety. In *B.A.A. v. Republic,*[133] the High Court upheld a three-year sentence for luring a 14-year-old schoolgirl out of school to engage in child labour.

Free Education and Regulation of Non-Tuition Fees

The introduction of FPE in 2003 caused net primary enrolment to surge from 87% to 92% within a single year.[134] The government subsequently introduced a '100% Transition Policy' to ensure all primary graduates reach secondary school.[135] Crucially, unlike Uganda, Kenya regulates non-tuition fees through ministerial guidelines,[136]

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130 National policy on the elimination of child labour (n 128) 13; Ministry of Labour and Social Protection (n 114) 2; Kenya Institute for Public Policy Research and Analysis 'Approaches to ending child labour in the arid areas' (2024), available at https://kippra.or.ke/approaches-to-ending-child-labour-in-the-arid-areas/ (accessed 22 May 2026).

131 Kenya Institute for Public Policy Research and Analysis (n 124).

132 JMA v Paul Njogo Kihara [2005] KEHC 638 (KLR).

133 BAA v Republic EKLR [2011].

134 Githitho-Muriithi (n 115) 4615.

135 National policy on the elimination of child labour (n 128) 11; Ministry of Labour (n 126) 3.

136 ISER Uganda's failure to regulate school fees in primary and secondary schools: A comparative analysis with other African countries regulating school fees in schools (2023) 19, available at https://iser-uganda.org/wp-content/uploads/2024/04/Ugandas-failure-to-regulate-school-fees-in-primary-and-secondary-schools.pdf (accessed 21 April 2026).

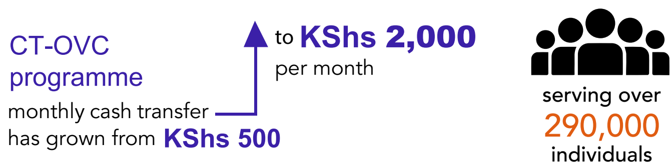
offering meaningful protection from unregulated school charges – a factor that materially reduces the cost-driven dropout that fuels child labour.

Support to Orphans and Vulnerable Children

The Presidential Secondary School Bursary (PSSB) allocates approximately KShs 1.35 million per constituency across all 290 constituencies to cover school fees for Orphans and Vulnerable Children (OVCs) in public boarding secondary schools,[137] administered through community-level Constituency Bursary Sub-committees.

Cash Transfer Programmes

With the support of development partners, the CT-OVC programme was launched as a pilot in 2004 covering 500 households in Kwale, Garissa, and Nairobi, and has been expanded to cover over 440,000 vulnerable households nationwide.[138] The monthly cash transfer has grown from KShs 500 to KShs 2,000 per month and the programme is now fully government-funded.[139] The government has consolidated this under the National Safety Net Program (2013-2026), serving over 290,000 individuals through five interlinked programmes.[140]



[137] Ministry of Gender, Culture & Children Affairs (Kenya), State Department for Children Affairs 'Presidential secondary school bursary (PSSB)', available at https://www.childrenservices.go.ke/presidential-secondary-school-bursary-pssb (accessed 21 April 2026). Approximately KShs 1.35 million per constituency across all 290 constituencies.

[138] Ministry of Gender, Culture & Children Affairs (Kenya), State Department for Children Affairs 'Cash transfer for orphans and vulnerable children (CT-OVC)', available at https://www.childrenservices.go.ke/cash-transfer-orphans-and-vulnerable-children-ct-ovc (accessed 21 April 2026). Launched 2004; pilot covered 500 households in Kwale, Garissa, and Nairobi; expanded to 440,000+ households nationwide.

[139] CT-OVC (n 138). Monthly transfer grew from KShs 500 to KShs 2,000 per month; the programme is now fully government-funded.

[140] World Bank 'World Bank to help Kenya build national safety net' (23 July 2013), available at https://www.worldbank.org/en/news/press-release/2013/07/23/world-bank-help-kenya-build-national-safety-net (accessed 21 April 2026). The National Safety Net Program (2013-2026) serves over 290,000 individuals through five interlinked programmes.

Corporate Accountability

Kenya's NAP-BHR acknowledges the lack of mandatory human rights due diligence requirements for businesses and is considering reviewing the Companies Act 2015 to require mandatory periodic reviews for high-risk business activities.[141] There has also been an interstate partnership with Uganda and Malawi in 2024 to address child labour in tea plantations,[142] though mandatory due diligence legislation is yet to be enacted.

4.2 Ghana 

In February 1990, Ghana became the first country to ratify the CRC[143] and is also a Pathfinder Country under Alliance 8.7.[144] The country, however, maintains only 179 labour inspectors monitoring a workforce of over 15 million people.[145] Ghana's economy is heavily reliant on the agricultural sector, particularly cocoa, fishing along Lake Volta, and gold mining.[146] Structural adjustment programmes in the early 1980s led to the privatisation of key sectors,[147] and despite these reforms, the nation continues to struggle with high levels of poverty and inequality in rural areas.[148]

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141 Government of Kenya *National action plan on business and human rights: For the implementation of the UN Guiding Principles on Business and Human Rights* (2019).

142 ILO 'Kenya joins Alliance 8.7 as a Pathfinder Country' (February 2026), available at https://www.ilo.org/publications/kenya-joins-alliance-87-pathfinder-country (accessed 16 June 2026). The 2024 interstate partnership between Uganda, Kenya and Malawi on tea plantation child labour was coordinated with ILO support.

143 UNICEF 'Convention on the Rights of the Child' (Ghana), available at https://www.unicef.org/ghana/convention-rights-child (accessed 19 March 2026). Ghana signed the CRC on 29 January 1990 and ratified on 5 February 1990, becoming the first country to ratify.

144 Child Labour Platform 'SDGs', available at http://childlabourplatform.org/sdgs/ (accessed 19 March 2026).

145 RA Aglagoh *The legal framework for the protection of victims of the worst forms of child labour in agriculture in Ghana: A human rights based approach* (2024) 19.

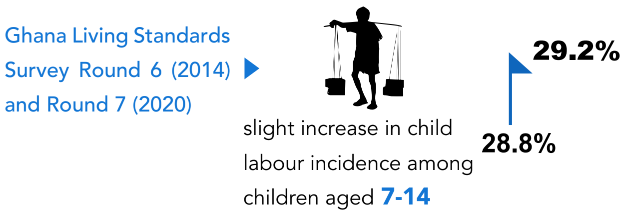
146 AF Hammond & C Dowuona-Hammond 'A review of the legal, policy and institutional framework on child labour in Ghana' (2025) 25 *African Human Rights Law Journal* 200-201.

147 T Crabbe, Forest Trends & FERN *Child labour laws and policies in Ghana with specific emphasis on the cocoa sector* (2020) 5.

148 Hammond & Dowuona-Hammond (n 146) 199; Aglagoh (n 145) 13.

4.2.1 Trends over Time

Ghana's experience is instructive because it illustrates both what well-designed strategies can achieve and the structural limits they face when underlying poverty is not adequately addressed. Earlier surveys, including the Ghana Living Standards Survey Round 6 (2014) and Round 7 (2020), indicated a slight increase in child labour incidence among children aged 7-14, from 28.8% to 29.2%. Sector-specific evidence suggests a decline in hazardous work within the cocoa sector between 2008 and 2014, demonstrating that targeted Child Labour Monitoring and Remediation Systems can produce meaningful reductions when properly resourced.[149]



However, the number of children in child labour reportedly rose from 230,000 in 2022 to 345,662 in 2023,[150] likely exacerbated by economic shocks and rising inflation. The agricultural sector remains the primary site of exploitation, accounting for 63.5% of all working children aged 5-14.[151] The lesson for Uganda is clear: well-established policy frameworks can be overwhelmed when macro-economic shocks are not accompanied by adaptive social protection responses.

4.2.2 The Legal Framework

Ghana's 1992 Constitution provides for the fundamental right of every child to be protected from work constituting a threat to their health, education, or development.[152]

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149 Crabbe and others (n 147) 7. The Ghana Living Standards Survey Round 6 (2014) and Round 7 (2020) recorded child labour incidence among children aged 7-14 rising from 28.8% to 29.2%. See *Ghana Statistical Service Ghana living standards survey round 6 (GLSS 6): Main report* (2014), available at https://www.statsghana.gov.gh/gssmain/fileUpload/Living%20conditions/GLSS6_Main%20Report.pdf (accessed 19 March 2026); Ghana Statistical Service Ghana living standards survey round 7 (GLSS 7): Main report (2018), available at https://www.statsghana.gov.gh/gssmain/fileUpload/pressrelease/GLSS7%20MAIN%20REPORT_FINAL.pdf (accessed 19 March 2026).

150 Aglagoh (n 145) 19.

151 As above 14-15.

152 Constitution of the Republic of Ghana, 1992, art 28.

The Children's Act[153] defines a child as any person under the age of 18[154] and creates a clear legal distinction between permissible child work and prohibited one, which is child labour.[155] The general minimum age for employment is 15 years;[156] light work is permitted for children aged 13 and above;[157] and hazardous work is strictly prohibited for anyone under 18.[158] The Act explicitly identifies mining, quarrying, porterage of heavy loads, and work involving chemicals or machines as hazardous.[159] The Human Trafficking Act of 2005 criminalises the recruitment or transportation of children for exploitative purposes.[160]

The judiciary's ongoing 'Justice for Children' reforms aim to create a child-friendly justice system.[161] However, there is a noted absence of widely reported successful prosecutions against duty-bearers, suggesting that accountability is yet to be fully realised.[162]

4.2.3 Key Drivers of Child Labour in Ghana

Poverty is the single most significant driver – the 'tree trunk'[163] upon which other issues like deforestation and gender inequality stand. For many households in cocoa-growing areas, the lack of a living income makes it impossible to hire adult labourers, forcing reliance on children for labour-intensive tasks.[164] The norm of informal apprenticeship also plays a vital role:[165] many parents believe that involving children in family occupations as young as five is traditional schooling necessary to build resilience.[166] Social factors such as unplanned

[153] Children's Act, Act 560 (Ghana).

[154] Children's Act (n 153) sec 1.

[155] Children's Act (n 153) secs 89-90; Constitution of Ghana, art 28(2).

[156] Children's Act (n 153) sec 90.

[157] Children's Act (n 153) sec 89.

[158] Children's Act (n 153) sec 91; A Ansong & KS Agomor 'Exploring legal and non-legal approaches to eliminating child labour in the cocoa industry in Ghana' (2024) 33(47) *Journal of Legal Studies* 5.

[159] Children's Act (n 153) sec 90(2); Hammond & Dowuona-Hammond (n 146) 207.

[160] Human Trafficking Act, Act 694 (Ghana), secs 1-2; Aglagoh (n 145) 73.

[161] Aglagoh (n 145) 96 & 107; Judicial Service of Ghana *Children before the courts: Towards child-friendly justice* (2018) 15.

[162] Aglagoh (n 145) 91 & 93.

[163] Ansong & Agomor (n 158) 2.

[164] Ansong & Agomor (n 158) 14-15; Hammond & Dowuona-Hammond (n 146) 199-200; Aglagoh (n 145) 126.

[165] Ansong & Agomor (n 158) 11.

[166] Aglagoh (n 145) 13 & 128; Ansong & Agomor (n 158) above.

parenthood often lead families to send children to work.[167] The cultural expectation of obedience makes it difficult for children to refuse work instructions.[168]

4.2.4 Strategies for the Elimination of Child Labour in Ghana

Policy Formulation

Ghana's response is structured through successive National Plans of Action.[169] The current policy – the Ghana Accelerated Action Plan Against Child Labour (NPA III, 2023-2027) – builds on previous efforts to halve child labour in agriculture and other priority sectors.[170] It emphasises a child-rights-centred approach focusing on galamsey (illegal mining), street hawking, and domestic servitude.[171] Institutional oversight is coordinated by the National Steering Committee on Child Labour (NSCCL) and the Child Labour Coordinating Secretariat.[172] Enforcement is primarily the mandate of Labour Inspectors and the Ghana Police Service.[173]

Increase of Labour Inspectors, Enforcement and Public Prosecutions

In 2023, the government increased the number of labour inspectors from 48 to 179, leading to more worksite inspections and a number of convictions.[174] This is a directly instructive step for Uganda, which currently has only 180 inspectors for a substantially larger workforce.

Cash Transfers

The Livelihood Empowerment Against Poverty (LEAP) programme provides bi-monthly cash transfers to vulnerable households, with amounts varying based on the number of eligible persons (from GHS 64 for one eligible member to GHS 106 for four or more

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[167] Ansong & Agomor (n 158) 12-13.

[168] Ansong & Agomor (n 158) 1; A Abdullah and others 'Social norms and family child labor: A systematic literature review' (2022) 19(7) *International Journal of Environmental Research and Public Health* 14.

[169] Hammond & Dowuona-Hammond (n 146) 195.

[170] As above, 216; Aglagoh (n 145) 15.

[171] Hammond & Dowuona-Hammond (n 146) 215; Aglagoh (n 145) 87.

[172] Hammond & Dowuona-Hammond (n 146) 216; Crabbe and others (n 147) 33.

[173] Crabbe and others (n 147) 32.

[174] Aglagoh (n 145) 19.

persons in household), with soft conditions including school enrolment and non-involvement of children in any form of child labour as conditions to benefit from the program.[175]

Gazetting Child Labour Free Zones

The government has promoted CLFZs – geographic areas where community monitoring has successfully eradicated child labour[176] – demonstrating that the CLFZ model used in Uganda's West Nile is replicable at scale.

Free Compulsory Universal Basic Education

Public education is a bedrock of the national strategy to address the "educational opportunity cost" of child labour.[177] Ghana's Free Compulsory Universal Basic Education (FCUBE) and Capitation Grant have significantly increased gross enrolment by removing formal tuition fees.[178] The Ghana School Feeding Programme (GSFP) serves as a powerful pull factor, improving cognitive development and making the classroom a more attractive alternative to hazardous work.[179] In 2017-2018, the government abolished fees for Senior High School (SHS), covering all fees for students in public senior and vocational high schools including boarding, meals, and textbooks.[180]

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175 Ministry of Gender, Children and Social Protection (Ghana) 'Livelihood Empowerment Against Poverty (LEAP)', available at https://www.mogcsp.gov.gh/projects/livelyhood-empowerment-against-poverty-leap/ (accessed 22 April 2026). Payment amounts per cycle: one eligible member GHS 64; two members GHS 76; three members GHS 88; four or more members GHS 106.

176 Hammond & Dowuona-Hammond (n 146) 214.

177 Aglagoh (n 145) 35 & 42.

178 Aglagoh (n 145) 121; Dunne and others (n 10) 93-94; A Boateng & M Dako-Gyeke 'Child labor in Ghana:

179 Current policy, research, and practice efforts' in FM Ssewamala, OS Bahar & MM McKay (eds) *Child behavioral health in sub-Saharan Africa* (2022) 278.

180 L Casely-Hayford and others 'The intended and unintended effects of secondary school fee abolition: Evidence from Ghana's free senior high school policy' (2025) 61(4) *Comparative Education* 566, available at https://doi.org/10.1080/03050068.2025.2463820.

4.3 South Africa 

Approximately 5 out of every 100 children in South Africa are classified as being engaged in child labour.[181] Millions of children remain trapped in hazardous industries like agriculture, mining, and domestic work due to structural poverty and educational barriers.[182] In 2024, the Department of Employment and Labour, in collaboration with the ILO, undertook targeted interventions in KwaZulu-Natal (KZN) and Western Cape, training community organisations, workers, employers' bodies, and public officials to detect child labour.[183]

4.3.1 Trends over Time

South Africa presents the clearest evidence of results from sustained, multi-pronged reform. Between 2010 and 2019, the number of children engaged in child labour declined by approximately 210,000.[184] Survey of Activities of Young People (SAYP) data shows that child labour probability dropped from 7.04% in 2010 to 5.02% in 2019.[185] Despite this downward trend, progress remains brittle; economic pressures and global shocks such as the COVID-19 pandemic have threatened to reverse these gains.[186] As of 2019, an estimated 571,000 children were still classified as being in child labour, predominantly concentrated in rural areas and the agricultural sector.[187]

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181 D Yu, S Murozvi & C Herwel 'Examining *child labour activities in South Africa' (2025) 54 Child & Youth Care Forum* 1338 & 1352.

182 US Department of Labor *2024 findings on the worst forms of child labor: South Africa* (2024) 1, available at https://www.dol.gov/sites/dolgov/files/ILAB/child_labor_reports/tda2024/South-Africa.pdf (accessed 19 March 2026).

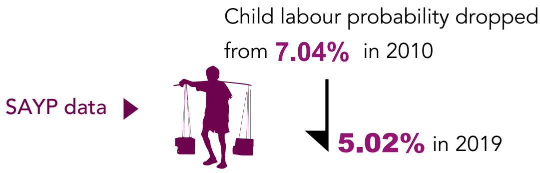
183 US Department of Labor (n 182) 1.

184 Yu and others (n 181) 1338.

185 As above, 1352.

186 UNICEF (n 7); Yu and others (n 181) 1346.

187 Yu and others (n 181) 1353 & 1359.



4.3.2 The Legal Framework

South Africa's constitution guarantees that all children are protected from exploitative labour practices.[188] The Basic Conditions of Employment Act (BCEA) prohibits the employment of any child under the age of 15 or who is still subject to compulsory schooling.[189] In 2013, the government significantly strengthened this regime by amending the BCEA to include protections for children working without formal contracts,[190] closing a critical loophole that previously left children in subsistence agriculture and domestic service without legal recourse. Additionally, the Occupational Health and Safety Act provides additional regulations protecting child workers aged 15 to 17,[191] and hazardous work is strictly prohibited for children.[192] South Africa has also enacted the Children's Amendment Act of 2007, [193] the Criminal Law Amendment Act of 2007,[194] and the Prevention and Combating of Trafficking in Persons Act to address more egregious crimes that children may be exposed to in the course of their involvement in employment.[195]

4.3.3 Key Drivers of Child Labour in South Africa

Household poverty remains a primary determinant, compelling families to utilise all available labour resources.[196] High rates of adult unemployment and severe income inequality create an environment where children's earnings are vital.[197] The HIV/AIDS

[188] Constitution of the Republic of South Africa, 1996, sec 28(1)(e).

[189] Basic Conditions of Employment Act (BCEA) 75 of 1997, sec 42.

[190] Sec 43(1) of the Basic Conditions of Employment Amendment Act of 2013.

[191] Occupational Health and Safety Act 85 of 1993, secs 8 & 43; BCEA sec 43.

[192] GN R710 in GG 33067 of 6 April 2010 (BCEA Regulations on Hazardous Work by Children) para 8.

[193] Children's Amendment Act 41 of 2007, secs 141-142.

[194] Criminal Law (Sexual Offences and Related Matters) Amendment Act 32 of 2007, secs 15-22.

[195] Prevention and Combating of Trafficking in Persons Act 7 of 2013, secs 18, 35 & 36.

[196] Yu and others (n 181) 1341. See DV Veeran 'Combating child labour – A South African challenge' (2003) 39(1) *Social Work/Maatskaplike Werk* 15.

[197] Yu and others (n 181) 1342-1344.

pandemic exacerbated child vulnerability by increasing the prevalence of child-headed households and orphans.[198] Research confirms that children from households where parents are absent are significantly more likely to engage in market work for longer hours.[199] Social norms regarding informal apprenticeship influence parental decision-making in rural areas,[200] with some communities viewing child involvement in family work as necessary socialisation.[201] In some instances, parents prioritise informal skills over formal education due to high graduate unemployment rates.[202]

4.3.4 Strategies for the Elimination of Child Labour in South Africa

National Child Labour Action Programme

The National Child Labour Action Programme (CLPA), now in its second phase, coordinates activities across various government departments to prevent and eliminate child labour by 2030.[203]

Cash Transfers and Social Protection

South Africa's social protection programmes are among the most effective tools in reducing child labour. The Child Support Grant (CSG) reaches over 13 million children, providing a monthly cash transfer of R580 per child plus a top-up of R290 to primary caregivers. Studies have shown that receipt of the CSG is associated with positive educational outcomes and a reduced likelihood of child labour.[204] Similarly, the Old Age Pension (R2,400 per month

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198 As above, 1338 & 1342. See D Budlender & D Bosch *South Africa: Child domestic workers: A national report* (2002) 15.

199 FM Ssewamala & OS Bahar 'Children at the intersection of HIV, poverty, and mental health in Sub-Saharan Africa (SSA)' in FM Ssewamala, OS Bahar & MM McKay (eds) *Child behavioral health in sub-Saharan Africa* (2022) 8; UNICEF 'Childhood: When social protection is most crucial' in V Nationen (ed) *Promoting inclusion through social protection* (2018) 32.

200 A Dawes and others 'Child agricultural work in South Africa: A contested space' in A Minujin & S Nandy (eds) *Childhood poverty: Multidisciplinary approaches* (2012) 11-12.

201 Abdullah and others (n 168) 9-10.

202 As above, 12.

203 ILO 'South Africa's fight against child labour' (11 June 2024), available at https://www.ilo.org/resource/article/south-africa%E2%80%99s-fight-against-child-labour (accessed 19 March 2026).

204 Ssewamala & Bahar (n 199) 8; UNICEF (n 199) 32. The Child Support Grant (R580/month per child) reaches over 13 million children; receipt is associated with positive educational outcomes and reduced likelihood of child labour. The top-up of R290 per month is paid to the primary caregiver.

for ages 60-75; R2,420 for those over 75) has made a measurable impact: in households with pension recipients, children's school completion rates increase and total hours worked decrease.[205] These transfers act as a buffer against uninsured shocks, preventing families from resorting to child labour.

Free Education, No-Fee Schools, and School Feeding

no-fee school programme covering approximately **81%** of the country's poorest primary schools

The South African Schools Act of 1996 mandates compulsory education for all children until age 15 or the completion of Grade 9, tying the education obligation directly to the permissible age of light work.[206] The government has implemented a no-fee school programme covering approximately 81% of the country's poorest primary schools.[207] The names of the no – fee schools are determined based on the economic status of the community around the schools and published in the provincial gazette.[208] For schools that do charge fees, charges are set by School Governing Body (SGB) vote and parents may apply for full, partial, or conditional exemption.[209] Schools are not allowed to charge school fees for orphans.[210] The government also provides school meals in public schools as part of efforts to eliminate food insecurity and enhance regular attendance.[211] These policies have successfully increased completion rates at both primary and secondary levels.[212]

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205 US Department of Labor (n 182) 4. The Old Age Pension (R2,400/month for ages 60-75; R2,420 for those over 75) is associated with increased school completion rates and decreased total work hours for children in recipient households.

206 South African Schools Act 84 of 1996, sec 3(1).

207 Department of Basic Education 'Government bridges inequality gap through no fee school policy' (undated), available at https://www.education.gov.za/ArchivedDocuments/ArchivedArticles/Governmentbridgesinequalitygap.aspx (accessed 19 March 2026).

208 South African Government: Education at https://www.gov.za/about-sa/education#:~:text=School%20fees%20and%20exemption,Higher%20Education%20and%20Training accessed on April 23, 2026.

209 South African Government 'Education', available at https://www.gov.za/about-sa/education (accessed 23 April 2026). School fees set by School Governing Body vote; parents may apply for full, partial, or conditional exemption.

210 South African Government (n 209). Schools are prohibited from charging fees for orphans.

211 South African Government (n 209). School meals provided through the National School Nutrition Programme in all public schools.

212 A Chanee 'Narrowing the achievement gap of Grade 12 in no-fee schools in Gauteng using pro-poor funding' (2020) 40(4) *South African Journal of Education* 1.

Amendment of Employment Legislation

The 2013 amendment to the BCEA to extend protections to children working without formal contracts is South Africa's most important legal innovation in the fight against child labour. This single legislative step closed the loophole most exploited by employers of children in agriculture and domestic service – sectors defined by their informality. This reform is directly replicable in Uganda through an amendment to the Employment (Employment of Children) Regulations, 2012.

5.0 Summary of Lessons Learnt

The comparative review of Kenya, Ghana, and South Africa yields clear and transferable lessons for Uganda. The following table synthesises the strategies employed and their applicability to the Ugandan context.

Area	Kenya	Ghana	South Africa
Education policy	FPE introduced in 2003; Implementing 100% Transition Policy from primary to secondary; ministerial fee guidelines regulate non-tuition charges.	Free Compulsory Universal Basic Education + Free SHS; GSFP.	No-fees policy that covers 81% of poorest primary schools in the county; compulsory schooling to Grade 9/age 15; free education for orphans, conditional, partial or exemption policies for parents who cannot afford school fees in schools that charge fees, school meals in public schools.
Cash transfers	CT-OVC covering over 440,000 households with KShs 2,000 per month leading to 12% reduction in on-farm child labour; increased secondary enrolment in beneficiary households.	LEAP: provides bi-monthly cash transfers (GHS 64-106/household); soft conditions on school enrolment and no involvement of children in child labour are part of the conditions to benefit from LEAP.	CSG reaching over 13m children by providing R580 per child per month; Old Age Pension of older persons starting from 60 years and above. These two programs have increased school attendance and reduced child labour in recipient households.

Area	Kenya	Ghana	South Africa
Legal protections	Children Act 2022 & Employment Act: set minimum age 13 (light work), 16 (industry); night work prohibited for all children.	Children's Act set minimum age 15 (general), 13 (light work), 18 (hazardous).	BCEA prohibits employment of any child under 15 years or still in subject to compulsory schooling. In 2013, BCEA was amended to cover children working in informal/uncontracted workers; Occupational Health & Safety Act contain provisions that protect health & safety of children lawfully permitted to work.
Corporate accountability	NAP-BHR considers mandatory Human Rights Due Diligence for companies; 2024 interstate partnership (Uganda, Kenya, Malawi) on tea plantations.	NSCCL and the Child Labour Coordinating Secretariat coordinates cross-sector enforcement and reporting.	CLPA coordinates multi-department enforcement; targeted ILO/Department of Labour inspections in KZN and Western Cape.
Labour inspectorate	Child labour committees in key counties; the 2024 interstate collaboration on elimination of child labour in tea plantations between Kenya, Uganda & Malawi.	In 2023, Inspectors were increased from 48 to 179 leading to more worksite inspections and convictions.	Targeted area-based enforcement; training of community organisations and public officials.
Child Labour Free Zones	Community committees in Kwale, Kajiado, Mombasa, Nairobi.	CLFZs in cocoa and galamsey zones; community monitoring model.	Not a primary strategy; sector-based enforcement preferred.

Area	Kenya	Ghana	South Africa
OVC support	PSSB (KShs 1.35M per constituency, 290 constituencies); CT-OVC for poorest households.	LEAP offers cash transfers every two months to vulnerable households; GSFP school feeding.	CSG; no-fee policy includes full orphan exemption from all school fees. Conditional, partial or full exemption for some parents who cannot afford.
Key lesson for Uganda	Regulate all school fees (not just tuition); expand OVC bursary; scale CT-OVC model with government funding.	LEAP model for SAGE reform; CLFZs replicable; build shock-responsive social protection; strengthen enforcement beyond single-commodity focus.	Extend legal protections to informal/uncontracted workers; implement no-fee model with orphan exemptions; expand CSG-style cash transfers.

Several cross-cutting themes emerge from this comparative analysis:

Social protection is the most powerful lever. South Africa's CSG – reaching over 13 million children – produced measurable, sustained reductions in child labour. Kenya's CT-OVC produced similar results. Cash transfers directly address the 'luxury axiom': when household income rises above the subsistence threshold, families are more willing and able to keep children in school.

Free education requires complementary action. Both Kenya's FPE and Ghana's FCUBE produced immediate enrolment gains, but these were eroded where hidden costs were not regulated, teacher quality was poor, or school feeding was absent. Uganda's UPE and USE suffer from the same failure modes.

Closing legal loopholes for informal workers is critical. South Africa's 2013 amendment extending BCEA protections to children without formal contracts is the single most relevant legal reform for Uganda, where the majority of child labourers work in informal settings.

Enforcement capacity must match legal ambition. Ghana's near-quadrupling of labour inspectors (48 to 179) is instructive for Uganda, which has only 180 inspectors for a far larger workforce. No law protects children if it cannot be enforced. This should be backed up with public prosecution of perpetrators of child labour or in some instances, parents or guardians of the exploited children litigating against those who exploit their children.

COVID-19 and disease outbreaks revealed the brittleness of progress. All three countries experienced setbacks during the pandemic. The lesson – documented by ISER and HRW for Uganda specifically – is that social protection systems must be designed as shock-responsive buffers, not static programmes.

6.0 Recommendations

The elimination of child labour in Uganda requires a shift from fragmented, piecemeal interventions toward a comprehensive, multi-sectoral approach. The following targeted recommendations are addressed to specific duty-bearers.

6.1 MoGLSD

i. Establish an Information Management System tracking employer compliance with employment, health, and safety standards, enabling strategic deployment of limited enforcement personnel.

ii. Integrate District Labour Offices into a centralised reporting structure, providing institutional backing to enforce compliance, particularly against high-influence local corporate actors.

iii. Amend the Employment (Employment of Children) Regulations 2012 to extend protections to children working without formal contracts – modelled on South Africa's 2013 BCEA amendment – closing the loophole most exploited in subsistence agriculture and domestic service.

6.2 MoGLSD and Ministry of Finance, Planning and Economic Development (MoFPED)

i. Implement the Cabinet resolution reducing SAGE eligibility from age 80 to 65 years, directly aligning the programme with Uganda's national life expectancy of 68.2 years.

ii. Pilot universal, child sensitive cash transfers targeted at primary caregivers of children, modelled on Kenya's CT-OVC and South Africa's Child Support Grant, as essential buffers against uninsured shocks in flood-prone Busoga and drought-affected Albertine.

iii. Significantly increase funding for District Labour Offices. The current ratio of 180 inspectors for 18 million workers is functionally equivalent to no oversight.

6.3 Ministry of Justice and Constitutional Affairs, and Parliament

i. Review the Companies Act and introduce mandatory human rights due diligence obligations for companies, particularly large-scale plantations and extractive sector operators, requiring transparent periodic human rights reviews covering full supply and value chains.

6.4 Ministry of Education and Sports (MoES) and Parliament

i. Amend the Education (Pre-Primary, Primary and Post-Primary) Act to fund and provide for genuinely free and compulsory basic education and explicitly prohibit the employment of children of compulsory school-going age.

ii. Issue binding regulations for all school charges – both tuition and non-tuition – modelled on Kenya's ministerial fee guidelines, to prevent the cost-driven dropout that is a primary driver of child labour.

6.5 MoES, MoFPED and Parliament

i. Increase the capitation grant allocation to UPE and USE schools to at least the National Planning Authority's recommended threshold.

ii. Recruit and deploy sufficient teachers in UPE and USE schools.

iii. Provide sufficient instrunctional materials and infrastructure in UPE and USE schools.

iv. Implement a universal, government-funded school feeding programme across all UPE and USE schools, serving as both a nutritional intervention and attendance incentive.

6.6 District Local Governments especially the labour and education offices

i. Sensitize the communities on the difference between child work and child labour and its dangers to children and society in general.

ii. Routinely monitor and inspect work places especially plantations and mines to ensure that children are not engaged in child labour.

iii. Arrest and prosecute culprits of child labour in the courts of law to act as example to the rest of the society.

iv. Undertake effective monitoring and supervision of UPE and USE schools to ensure that children attend school regularly.

v. Coordinate with SMCs and Local Council leadership to ensure that parents who withdraw their children out of school and engage them in child are brought to book.

6.7 Business entities

i. Establish due diligence mechanisms for elimination of human rights abuses such as child labour in their respective supply chains.

6.8 Community Leaders, Households, and Civil Society

i. Challenge social norms that view child labour as traditional socialisation. Empower communities to identify and report invisible forms of exploitation, including hidden domestic servitude and artisanal mining.

ii. Promote the meaningful participation of children as agents of change through school clubs, youth councils, and advocacy platforms.

iii. Undertake continued awareness creation to enable the communities to understand the difference between child work and child labour.

iv. Target the root causes of gender inequality, specifically the disproportionate burden of household chores placed on children, which reinforce underinvestment in their education and perpetuates cycles of poverty.

v. Support parents/ guardians that are willing to take action against persons that engage their children in child labour with litigation costs or even leading them to the responsible government offices.

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