

Protecting Children's Rights: Risk Assessment

A Child Labour Risk Assessment (CLRA) is a critical step in identifying conditions that may lead to child labour and the worst forms of child labour. By understanding where and why risks exist – such as poverty, lack of education, cultural norms, or inadequate employer policies or purchasing practices – organisations can take proactive measures to address these vulnerabilities before they result in harm. It also ensures compliance with legal and ethical standards, protects children's rights, and strengthens the sustainability of supply chains by reducing reputational and operational risks.

Child labour key drivers include:

- **Low-income smallholder farms:** Child labour often occurs in poor family units with low education and income
- **Large farms or plantations:** Migrant workers bring children due to high harvest targets, piece-rate systems, and lack of childcare or schooling
- **Cultural acceptance:** In some regions, child labour is seen as skill-building, especially where poverty and limited education access prevail

Risk factors that increase child labour:

- **Limited access to education** (high costs, lack of schools/daycare, documentation issues, long distances)
- **Low wages** pushing families to involve children, especially during peak seasons
- **Absence of employer policies** (e.g., age verification)
- **Weak law enforcement** due to few inspectors and remote locations
- **Lack of awareness** about children's rights and legal requirements

This quick guide provides information on the:

- Steps to conduct a CLRA
- Concrete examples on how to conduct a CLRA and define mitigation measures

4C Managing Entities (MEs) are required to conduct a CLRA on a regular basis, and 4C recommends doing this annually. Among other, the assessment should cover key criteria such as:

- working conditions for young workers under 18 and identification of hazardous work
- methods for age verification
- access to education, both formal and informal education
- compliance with minimum wage (workers), family's income and income sources (BPs), and family's socioeconomic situation



- awareness of children's rights and social norms of child protection, education and acceptable activities for children.

The table below outlines the key steps for setting up an effective CLRA process, along with the measures that MEs and Business Partners (BPs) should take to implement it. It also provides guidance for auditors to evaluate the effectiveness of the CLRA.

What are the steps to conduct a CLRA?

Steps	What should the MEs and/or BPs do?	What should auditors do?
Step 1. Preparation	1.1 Appoint a responsible person or outsource the assessment to someone with adequate qualifications (e.g., knowing social issues, human rights, child labour, forced labour). 1.2 Scoping exercise: It is key to understand the drivers behind child labour in the local context. These factors help design a time and cost-efficient assessment with clear targeted group(s). 1.3 Understand the labour profile of your BPs, workers of BPs, and ME • MEs and BPs shall keep and maintain an updated record of the number of children of all BPs (especially smallholder BPs). BPs should regularly provide the MEs with updated information on their source of labour (including family labour force, hired labour) on the farms or facilities	• Confirm that a designated person has been appointed or an outsourced person has been assigned for overseeing the CLRA process. Check for written documentation specifying the role and responsibilities • Ensure that local drivers of child labour have been identified. Review reports or notes. Interview the responsible person to confirm understanding of the local context • Check that updated records exist for the labour profile of the 4C Unit. Ask BPs and MEs how they collect and update this information and how it is used to assess child labour risk

Steps	What should the MEs and/or BPs do?	What should auditors do?
Step 2. Identify actual and potential risks	To identify potential and actual risks of child labour, it is essential to assess conditions linked to key risk factors. This process should begin by developing a set of guiding questions to evaluate these conditions. Key steps include: 2.1 Consult with relevant stakeholders 2.2 Review complaints/grievances 2.3 Conducting field observations All findings should be documented carefully, as this information will form the basis for defining appropriate prevention measures for each criterion assessed.	• Review meeting records, minutes or reports showing consultations with stakeholders • Review grievance mechanism and records. Review actions taken to address grievances • Review reports of field assessments. Ask field staff about the assessment methods and results • Review risk assessment matrix or reports showing results and mitigation measures defined • Verify whether the documented results of the CLRA align with the auditor's own findings from interviews and field observations conducted during the audit
Step 3. Identify prevention measures	3.1 Identify prevention actions for each identified risk It is recommended for MEs to define a mitigation action for all risks identified through the CLRA. This will allow responding to potential risks (through prevention measures) or remediating actual child labour cases. 3.2 Appoint a responsible person and team accountable for implementation	• Review the CLRA documentation to confirm that for every identified risk, there is a corresponding mitigation or prevention action defined • Check records showing implementation progress or monitoring of these actions • Ask the responsible person how mitigation measures were determined and how they are tracked • Confirm that a specific person and/or team has been formally appointed to oversee implementation of mitigation actions

How to identify actual and potential risks?

To identify potential and actual risks of child labour, conditions linked to key risk factors must be assessed. For this, it is key to consult relevant stakeholders, review existing complaints or grievances and make observations in the field. The table below provides examples of questions that can help guide this process and uncover risks effectively.

Working conditions for young workers under 18 years	• Is there a national hazardous work list available in the country? • If yes, is this being used to determine tasks for young workers under 18 years? • If no, is there another list of hazardous work being used as reference? • Have the tasks, processes and working conditions for young workers under 18 years been defined? • Are young workers under 18 years provided with regular trainings on Operational Safety & Health (OSH) procedures? • Are they provided with adequate Personal Protective Equipment (PPE)? • Are young persons supervised by adult and experienced workers?
Age verification	• Is there a valid process to verify the age during the hiring process? • Are there records available for recording and keeping track of young worker's age? • Is there a list of children below 18 years living on the farm?
Access to education	• Are there schools nearby for children of compulsory school age to attend? • Are school enrolment and attendance continuously monitored? (at school) • Are there transport options available for schools located in a far distance? • If no schools or transport is available, are there other means of official education provided on site? • Are migrant workers hired during the harvesting season? • If yes, do they arrive with their children? If yes, are facilities available which offer learning experiences and activities for children during working hours of their parents? • Do school breaks and vacations overlap with peak harvest season? • If yes, where and how do children spend their day? • Is there access to adequate childcare?
Minimum wage	• Are workers paid at least the minimum wage? • Are there piece-rate workers? If yes, has the piece-rate level been set in a way that enables workers to earn the minimum wage?



Awareness raising	- Are MEs, BPs and their respective workers aware of the difference between child labour and acceptable activities for children and acceptable working conditions for young workers under 18 years? - Are children below 18 years carrying out hazardous work in any farming activity related to coffee or other crops?
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Once the specific risks faced by the 4C Unit are understood, the next step is to define clear actions to mitigate them. A risk assessment matrix can be a useful tool for this, as it outlines risks by specific criteria and helps identify appropriate mitigation measures. The table below provides an example of what such a matrix might look like, along with possible mitigation actions.

	Main findings	Risk level	Mitigation measures
Working conditions for young workers under 18 years	- Trainings on OSH have been provided for young workers - List of hazardous work for young workers is available	Low	Ensure regular trainings continue to be provided for supervisors and young workers on safe work practices and monitor working conditions regularly.
Access to education	- School records and teacher interviews indicate that school attendance in the local community is low - Additionally, some farmers reported that schools are located far from their farms, which may contribute to the low attendance rates	Medium	- Support transportation options for children (e.g., school bus or community transport) - Provide school-related incentives (scholarships, supplies) - Collaborate with local authorities to establish satellite learning centres closer to farms - Raise awareness among farmers about the importance of education
Awareness raising	- Interviews revealed that many farmers and workers have limited knowledge of children's rights and the legal implications of child labour - No structured training or awareness programs on child labour prevention were reported by most stakeholders	High	- Develop and deliver training sessions for farmers, workers and community members on child labour risks and legal requirements - Use posters, radio messages and community meetings to raise awareness about the importance of preventing child labour

Example

What should auditors consider before the audit?

- Before the field audit, auditors should carry out a desktop child labour risk assessment.
- This includes reviewing data and reports from international organisations, recent publications, and news to understand country and regional risks.
- Special attention should be given to factors such as social conflicts, remoteness, limited school access, poverty levels, compulsory education data, dropout rates, and other relevant national laws.
- Auditors must also review national legislation on acceptable activities for children and acceptable working conditions for young workers, hazardous activities, and consult relevant stakeholders.
- Additionally, they should assess the quality of the Managing Entity's Internal Management System (IMS), focusing on child labour risk assessments, past non-conformities, suspended certificates, and compliance history.
- The findings should guide sample size determination and help prioritise farms and areas for deeper inspection. 4C recommends the following sources, though additional sources may also be used:
 - [Findings on the Worst Forms of Child Labour](#), Bureau of International Labour Affairs, USA
 - [List of Goods Produced by Child Labour and Forced Labour](#), U.S Department of Labour
 - [Percentage of children aged 5-17 years engaged in child labour](#), United Nations Children's Fund (UNICEF)
 - [Children in employment, total \(% of children ages 7-14\)](#), World Bank
 - [Child Labour Observatory](#), International Labour Organization (ILO)