



# CHILD PROTECTION POLICY IMPLEMENTATION MANUAL

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## Introduction

All children, wherever they live and whatever their circumstances, have the right to be protected, nurtured and free from all forms of violence, abuse, neglect, maltreatment and exploitation as set out in the [Convention on the Rights of the Child](#) (CRC). Demonstrating its commitment to addressing the welfare and driving respect for children's rights in Indonesia's palm oil industry, Wilmar International introduced its [Child Protection Policy](#) in 2017. The policy sets out Wilmar's commitment to protecting all children in its operations and supply chains. All Wilmar suppliers and contractors are also expected to commit and adhere to the policy.

To guide and support Wilmar's suppliers and contractors in adhering to the Child Protection Policy, Wilmar developed this Child Protection Implementation Manual to address child protection, and to establish best practices by building corresponding policies, procedures and remedial actions. This manual's main objective is to support Wilmar's suppliers and contractors in implementing child protection, but with hopes that it will be adopted by other companies to promote adoption of child protection principles and practices in the agriculture industry.

Wilmar's Child Protection Policy is based on the principles of the [Convention on the Rights of the Child](#) (CRC) and provides a comprehensive framework for the protection, provision for and participation of all children without discrimination to ensure their survival and development.



## What is child protection and why is it important for your business?

Child protection is the protection of children from violence, exploitation, abuse and neglect. Child protection is important for businesses that come into direct and indirect contact with children. Establishing child protection policies and procedures can help to create 'child safe' businesses that can prevent and respond to instances of intentional and unintentional harm to children.

With policies and practices geared toward the prevention of harm, children will feel safe, respected and listened to. When children are safeguarded, families are more secure and children are better able to develop. This is important for companies that have employees and their families living on-site, as child protection can stabilise the workforce, and create a safe and pleasant working atmosphere. Furthermore, a proactive approach to protecting the welfare of children will minimise legal and reputational risks and supply chain disruption while building stakeholder trust and sustainable business.

The updated Roundtable on Sustainable Palm Oil (RSPO) Principles and Criteria now require members to have a formal child protection policy, a documented process for evidence of age, and training for company staff on child protection<sup>1</sup>. Therefore, adopting a solid policy and approach to child protection has the added benefit of supporting compliance with the RSPO certification scheme.

## What are children's rights?

The [Children's Rights and Business Principles](#) state that all businesses have a responsibility to respect and support the rights of children. Children's rights are fundamental entitlements. Special protection must be given to all children to ensure the realization of their happy, healthy development without fear of harm, discrimination or exploitation.

Children's rights are enshrined in several international treaties, of which the Convention on the Rights of the Child (CRC) is most important and authoritative. The CRC covers a range of rights including civil rights, family, health, welfare, education, leisure, play and culture. Importantly, the CRC sets out the principles that "In all actions concerning children, the best interests of the child shall be the primary consideration."

Children's rights are also outlined in:

- International Labour Organization (ILO) Convention No. 138 on Minimum Age
- ILO Convention No. 182 on Worst Forms of Child Labour
- Convention on the Elimination of Discrimination against Women (CEDAW)
- International Convention on the Protection of the Rights of All Migrant Workers and Members of their Families (ICMW)
- Optional Protocol to the CRC on the sale of children, child prostitution and child pornography
- RSPO Guidance on Child Rights for Palm Oil Producers
- All applicable national laws and regional directives

<sup>1</sup> RSPO Principles & Criteria (P&C) 2018, criterion 6.4

## About this Manual

The manual is intended to help the following business entities who come into contact with children in palm oil communities, to understand the steps they need to take to safeguard children and to ensure respect for children's rights.

- All Wilmar operations worldwide, including those of our subsidiaries
- All third-party suppliers

Adhering to Wilmar's Child Protection Policy is mandatory for all Wilmar employees, suppliers and contractors and this manual is particularly relevant for the protection of children who use Wilmar's managed services (including schools, childcare facilities, clinics and transportation).

This manual demonstrates how Wilmar and its suppliers will meet its legal obligations and reassure employees, suppliers, contractors and the general public on what Wilmar and its suppliers are expected to do to respect children's rights. To this end, the manual aims to:

- Raise awareness of the most salient child protection issues prevalent in Indonesia's palm oil industry
- Give a voice to any concerns through established procedures
- Ensure that all reports of abuse or potential abuse are dealt with in a serious and effective manner, keeping the best interest of the child as paramount
- Put in place an efficient monitoring system to track progress
- Provide appropriate training to employees, suppliers and contractors on the implementation of the Child Protection Policy

Wilmar's Child Protection Policy shall be referred to as "the Policy" throughout the document.



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## How to Use this Manual

The manual is designed to provide a basic understanding of child protection in the context of Indonesia's palm oil industry, and to provide guidance on identifying and mitigating risks to children. The manual is divided into three sections:

**Section I** starts with a background on children's rights and child protection issues in Indonesia's palm oil industry and defines important concepts.

**Section II** sets out a 6-step approach to the implementation of Wilmar's Child Protection Policy on a day-to day basis.

**Section III** provides an in-depth overview of child labour, how it can be addressed according to best practice and guidance on how to develop a child labour remediation plan.

## DEFINITIONS

**Child:** person under the age of 18<sup>2</sup>

**Children's Rights:** a subset of human rights with particular attention to the special protection and needs of minors<sup>3</sup>

**Child Protection:** the protection of children from violence, exploitation, abuse and neglect<sup>4</sup>

**Child Labour:** work that deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development<sup>5</sup>

**Sexual Exploitation:** the sexual exploitation of children is defined as abusing or taking advantage of a child for personal gain, by involving them in sex work or sexual activity<sup>6</sup>

<sup>2</sup> UNICEF, The Convention on the Rights of the Child: The Children's Version

<sup>3</sup> UNICEF, Child rights and why they matter

<sup>4</sup> [UNICEF, Child Protection](#)

<sup>5</sup> ILO, What is child labour?

<sup>6</sup> [UNICEF webpage on Child Protection: Violence against children](#)



## Section I: The Situation of Children in Indonesia

Indonesia is the world's fourth most populous country, and with roughly 89 million people under the age of 18, the country also has the fourth largest child population<sup>7</sup>. In recent decades, Indonesia has made considerable progress in reducing poverty due in large part to economic growth. Despite this progress, approximately 26 million people continue to live below the poverty line and a further 70 million are vulnerable to falling into poverty each year.

Data on the situation of children is not always widely collected, and due to Indonesia's large size and diversity, national trends often mask significant disparities across regions. Nationally, about 50 million children are living in poverty and at risk of child labour, trafficking and exploitation. Child poverty rates are generally higher in rural areas where palm oil plantations are located and are associated with gender and educational background of parents and caregivers. Almost 98% of children aged 7 to 12 years attend primary school, although children living in the poorest households are four times more likely to be out of school than children from the wealthiest households. Data from 2011 (latest available) estimate that there are 2.3 million children aged 7-15 years who are out of school.

### Children in Indonesia's Palm Oil Sector

Although child labour is a major concern in Indonesia's palm oil industry, children are directly and indirectly impacted by the palm oil industry in a number of other ways, both positive and negative. The industry plays a large role in supporting family livelihoods in rural parts of Indonesia. UNICEF estimates that up to 5 million children are affected by the palm oil industry in Indonesia as dependents of workers, members of the community and at times workers themselves<sup>8</sup>.

Some of the most concerning impacts on children stem from substandard working conditions for parents and caregivers. For instance, low wages and unreasonable quotas for working parents can create a need for children to work to supplement family incomes, which increases the risk of child labour and affects their educational opportunities. Long working hours and lack of affordable childcare can also limit parent's ability to supervise and nurture their children during the working day and put children at risk of abuse, neglect and exploitation. Furthermore, limited maternity protections can increase the risk to workers and their children of exposure to toxic chemicals, which can have devastating impacts on child health.

Children in palm oil communities can be vulnerable to a number of child protection risks, due to poverty, limited access to government services and social exclusion. Rural areas of Indonesia have low rates of birth registration, which can limit children's access to education, healthcare and social protection services.

Given the intersectionality of child protection risks, companies should link other policies and practices to address concerns regarding children.

<sup>7</sup> [World Bank Country Profile: Indonesia \(2019\)](#)

<sup>8</sup> [UNICEF, Palm Oil and Children in Indonesia: Exploring the Sector's Impact on Children's Rights \(2016\)](#)

For example, initiatives and policies at company or estate level, such as programmes covering women's interest and rights, education and health need to be cognizant of impacts to children. Wilmar's Women's Charter<sup>9</sup> and Human Rights Framework<sup>10</sup> also include specific elements linked to child protection.

*Further reading*

- [UNICEF Palm Oil and Children in Indonesia: Exploring the Sector's Impact on Children's Rights, 2017](#)
- [RSPO, Children's Rights in RSPO Member Palm Oil Plantations in Indonesia, 2019](#)

## Indonesia's Legal Framework on the Protection of Children

Indonesia is a signatory to a number of international human rights treaties that obligate the government to enact laws and policies to protect and fulfill children's rights. The government ratified the CRC in September 1990, and has adopted a number of other instruments including the Optional Protocol on the involvement of children in armed conflict, the Optional Protocol on the sale of children, child prostitution and child pornography, and the International Convention on the Protection of the Rights of All Migrant Workers and Members of their Families. Indonesia was also the first country in the Asia and Pacific region to ratify all eight core ILO conventions covering the fundamental principles and rights at work, including No. 138 and No. 182 on child labour.

Since ratifying these important treaties, Indonesia has made progress in adapting their provisions into national laws. In 2016, amendments were made to the 2002 Child Protection Law to further strengthen laws protecting children from sexual offences. In 2018, Indonesia made a moderate advancement in efforts to eliminate the worst forms of child labour, according to the US Department of Labor. The government has also ratified the Association of Southeast Asian Nations (ASEAN) Convention Against Trafficking in Persons, Especially Women and Children, which enhances human trafficking protections for children.

*Further reading*

- [US Department of Labor, 2018 Findings on the Worst Forms of Child Labor: Indonesia, 2019](#)

<sup>9</sup> [Wilmar Women's Charter, 2019](#)

<sup>10</sup> [Wilmar Human Rights Framework, 2019](#)



## Child Protection Risks for Children in Indonesia's Palm Oil Industry

In order to protect the interests and wellbeing of children within all operations, both inside and outside of the workplace, in workers' communities and employer-provided facilities, the following key principles should be adopted:

- Every child has the right to be protected from abuse and exploitation, recognizing that the best interests of the child should prevail in any decision-making regarding their rights. The company should take responsibility to meet its obligations regarding duty of care towards children and take action if a child or young person is at risk or is actually harmed.
- To ensure that its own operations, those of suppliers and contractors adhere to and comply with the Policy, and seek to align their respective procedures with the principles and approaches as set out in the Policy.
- Recognise the potential risks and impacts of its operations and those of its suppliers and contractors on the rights of children, and will do all it can to reduce or mitigate these impacts.
- Ensure that employees, workers, suppliers and contractors are properly trained and communicated related to the Policy as a key part of its responsible recruitment process.

The principles above apply to a range of child protection issues covered in Wilmar's Child Protection Policy. A selection of important issues are covered below, including child labour, violence against children, sexual exploitation, welfare of children living with working parents, access to education, road safety and birth registration.



## Child Labour

Child labour is one of the key child protection concerns in the palm oil sector. As defined by the ILO Minimum Age Convention (No. 138) and Worst Forms of Child Labour Convention (No. 182), child labour is work that is harmful to children's mental, physical, social or moral development.

Wilmar has a zero-tolerance policy on child labour as set out in its **No Child Labour Clause**, which is applicable to all employment practices in Wilmar's operations, as well as its suppliers and contractors.

For more on child labour and Wilmar's approach to addressing child labour, see Section III.

## Violence against Children

Violence against children in homes, schools and communities is prevalent in Indonesia. Though Indonesia has seen a decline in bullying, physical fights and physical attacks,<sup>11</sup> boys are especially at risk of physical attacks in school by teachers and peers. Teachers often use corporal punishment to discipline children and awareness on how to report such incidents of violence is limited.

In Indonesia, adolescent girls are more likely than boys to be subjected to harmful practices such as child marriage. According to UNICEF, one out of every nine girls are married before the age of 18, and girls from the poorest households are more likely to be married as children than their wealthiest counterparts<sup>12</sup>.

## Sexual Exploitation

The sexual exploitation of children is defined as abusing or taking advantage of a child for personal gain, gratification or profit resulting in inhumane and harmful treatment of the child (including accessing sexual images on the internet)<sup>13</sup>. Sexual exploitation and abuse can also involve forcing, or grooming a child to take part in sexual activities, whether or not the child is aware of what is happening. This may include non-contact activities, such as involving a vulnerable person in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse can be carried out by adults or other children.

Sexual exploitation is illegal, constitutes gross misconduct and grounds for disciplinary action and prosecution. Wilmar recognises that protecting children from harm is everyone's responsibility and that it has an obligation to put in place reasonable measures to ensure, as far as possible, the safety and wellbeing of children in the communities in which they live. This applies to all persons who come into direct contact with children such as caretakers, teachers / educators, bus drivers, management and any personnel who live alongside children in plantation communities.

<sup>11</sup> [UNESCO, Behind the numbers: Ending school violence and bullying, 2019](#)

<sup>12</sup> [UNICEF \(Indonesia\), Child Protection](#)

<sup>13</sup> [Save the Children Resource Centre](#)

Wilmar and its suppliers should respond to all forms of child exploitation and child abuse swiftly and appropriately from when these are made known. Suppliers and contractors should develop an approach to protect children from sexual exploitation and abuse through mandatory vetting of all employees and the provision of training on the prevention of exploitation and abuse developed with child rights experts / organisations. In addition, suppliers must cooperate with investigations teams and law enforcement officials when child victims and witnesses are involved.

### RAISING AWARENESS ON SEXUAL HARASSMENT, VIOLENCE AND ABUSE AGAINST WOMEN AND GIRLS

Since 2019, Wilmar's Women Working Group have organised awareness programmes on sexual harassment and abuse against women and girls in our plantations. To date, approximately 1,461 women and girls have benefitted from this awareness programme.

Mainly focusing on women and girls, the programme also emphasises that both women and men from all walks of life can be subjected to sexual harassment, though women are the primary victims.

The objectives of the programme are to:

- Raise awareness that sexual harassment can happen to anyone and anywhere (e.g. home, online, public transport, public spaces or areas, etc.)
- Raise awareness on the many forms of sexual harassment i.e. Verbal, Gestural, Psychological, Visual, Physical and Online
- Raise awareness on child sexual exploitation
- Raise awareness on what can be done if they, or a person they know, is sexually harassed and / or abused

Overall, the awareness programme has created a trusted space for open dialogue, to voice concerns directly with the management and to identify possible solutions to any issues raised.

## WHAT CAN COMPANIES DO?

- Put in place a vetting process when hiring employees, especially those who have direct contact with children. A vetting process can include the following:
  - Request a *Keterangan Kelakuan Baik* (SKKB), equivalent to a Criminal Record Bureau (CRB) check or police certificate, issued by the Indonesian police to rule out all forms of misconduct involving children, such as sexual exploitation, violence and abuse
  - Check employment history including an assessment of reference checks and / or disciplinary proceedings instigated as a result of malpractice
  - Request relevant information from professional organisations associated with teachers, childcare service providers, healthcare practitioners, etc.
  - Issue code of conduct / child protection policy to prospective employees and require commitment and signature upon commencement of employment
- Ensure that contractors and suppliers conform to similar procedures
- Where issues have been identified, companies should:
  - Put victims first and engage qualified child rights experts and organisations competent in handling children
  - Report any concerns or suspicions of abuse / exploitation and any violations of the Policy to a Human Resources Representative / nominated contact either directly or via an anonymous hotline / email address. They will decide on the appropriate steps to take which may include referring the matter to local authorities and supporting criminal prosecution.
- Strengthen victim assistance by working with law enforcement.
- Only share sensitive information related to sexual exploitation and abuse of children involving employees with law enforcement officials and the appropriate internal senior functions.

## Welfare of Children Living with Working Parents

Companies should ensure the welfare and wellbeing of children who live with their working parents, and for families that use supplier managed services (e.g. schools, childcare, clinics and transportation). This also extends to children living in worker housing and recreational facilities.

Wilmar expects suppliers to work toward strengthening education and health care systems in palm oil communities as well as ensuring that childcare is easily accessible and suits parent's working patterns. This is imperative to build resilient communities around the plantations which will ultimately result in a stronger workforce and more productive plantations.

Promoting gender equality also produces the “double dividend” of benefiting both women and children and is pivotal to the health and development of families, communities and nations. If women are able to achieve economic self-sufficiency and to be protected from violence and discrimination, this will also impact positively on the lives of children.

## TRAINING VISITS TO ESTABLISHED CHILD CARE CENTRES AND NURSERIES

Initially, Wilmar crèche employees were provided with only basic training. Through continuous feedback from employees and external parties, Wilmar and the Women Working Group (WoW) saw the urgency of focusing on the learning needs of children and detailed safety requirements, as well as equipping caregivers with the right knowledge.

In 2018, Wilmar conducted in-depth training on the Child Protection Policy (CPP) for its crèche caretakers and nannies with a primary focus on child safety and handling. A series of meetings was held with WoW to define and introduce the role of a dedicated crèche sub-committee, which allows for easier reporting to the management on crèche-related issues and to facilitate regular updates on crèche matters and child welfare.

In August 2018, selected Wilmar crèche workers visited two established nurseries and kindergartens in Kota Kinabalu, Sabah, Malaysia to learn more about best childcare practices. They also learned more about meal plans, safety and health checks. Following their visit, crèche workers understood the need to introduce educational, play-based activities for children. They had also learned effective communication methods.

The objectives of the visit were:

- To better understand the importance of, and to manage, the crèches cleanliness and the safety of the children
- To gain knowledge, ideas and skills on improving childcare in the crèches

To date, the WoW continues to monitor crèches and improve the facilities through regular interactions with the crèche sub-committees, parents and with the estate management.

## Access to Education

According to the World Bank, Indonesia's education system is the fourth largest in the world. However, a shortage of schools and qualified teachers in Indonesia poses significant challenges for the education system. In rural areas, primary school enrolment rates are lower; the more affluent areas, however, have achieved universal primary education<sup>14</sup>.

In respecting the right to education, Wilmar expects suppliers and contractors to provide all children of its staff the best possible opportunities to access primary and secondary schooling. Access to education is critical in ensuring and enabling other rights, such as health and adequate standard of living. While there is no legal obligation to provide schools, Wilmar recognises that education can unleash a child's potential and be a powerful deterrent to child labour.

<sup>14</sup> World Bank, The Promise of Education in Indonesia

Provision of educational opportunities fill a critical service gap where operations are remote and where schools are located far from communities. Transport to schools is often provided in such cases. Oftentimes, parents do not see the value of education and this can be a key barrier to children realising their right to education.

Where schools are run or funded by companies, responsible recruitment practices should be instated (e.g. vetting / police background checks) to ensure safety and suitability prior to working directly with children.

## SECURING ACCESS TO EDUCATION DURING THE COVID-19 PANDEMIC

Schools across the globe have closed, and many lessons moving online, due to circumstance surrounding the pandemic. School closures affect more than 9,000 children of school going age who live in our estates in Indonesia, Ghana, Malaysia, and Nigeria, where online connectivity can be challenging even at the best of times.

To help maintain education in Wilmar's oil palm estates, the company adopted the following guidelines during school closures in the Covid-19 pandemic period:

- Schools will remain shut and no classroom learning shall resume until government ruling or order is received
- We work with schools and teachers on developing new SOPs for when school lessons resume. Wilmar will assist with the provision of disinfectants, hand sanitisers, and PPE
- We assist teachers to facilitate access to homework, worksheets, and reading materials by printing it out at our office or by providing readily available activity books
- Learning materials are distributed to children in our estates through cooperation with teachers, members of our women committees / women working groups, and our estate staff
- We maintain open communications with teachers to help monitor the situation and providing assistance where we can, such as with homework checks and evaluations, as well as providing supplies and other help needed
- Where online or televised/radio programmes are in place, we will work with the teacher to help ensure maximum usage.

To ensure that education continues to be accessible to children living in our estates during this period of school closures in the Covid-19 pandemic, coordination between the teacher and management is important. We organise regular meetings with teachers to find out what kind of suitable material can be provided for the children, and how best we can monitor progress of the children.



## WHAT CAN COMPANIES DO?

- Work with parents to understand the barriers that their children face in accessing education, including household poverty, hidden costs such as tuition fees, books and uniforms that may be unaffordable for the family, as well as transportation options and costs for getting to and from school.
- Help parents understand the value of education by connecting them to opportunities, including potential scholarships or social support programmes such as childcare, transport buddy systems, clubs, activities, and hobbies.
- Help workers' children to access secondary education, i.e. by providing transport, so that children are less likely to need to enter work at a young age.
- Instate responsible recruitment practices when hiring teachers / care workers to ensure the safety of children.
- Work with local government to extend access to education in remote areas.
- Collaborate with local NGOs and / or local universities to improve teacher training and enhance the quality of education.
- Provide transportation for workers' children attending primary and secondary schools.
- Provide scholarships to children in palm oil communities. Even if free tuition is offered, parents can use scholarship funds for school uniforms and books, for example.

## Road Safety

Protecting the safety and wellbeing of children extends beyond operations to children living in communities. Where there are large vehicles moving through work sites, the safety of children must be taken seriously. This is to prevent any potential road incidents and fatalities. In order to reduce such risks, it is important to increase awareness of moving vehicles on plantation sites to improve safety and protection of children from potential road traffic injuries. Working with local civil society organisations could strengthen road safety education of children and adolescents – improving local awareness of simple safety and traffic rules for children.

## WHAT CAN COMPANIES DO?

- Work with relevant civil society organisations to provide training to communities on road safety education to increase awareness.
- Put in place safety measures, such as speed limits in areas with children, display of adequate and visible traffic safety signs.
- Provide training to drivers and operators of large moving vehicles to adhere to road safety rules.
- Put in place a rule against allowing unlicensed children and adolescents to drive on company premises.
- Provide socialisation to children regarding self-protection for road safety.

## CHILD SAFETY AND PREVENTION OF ACCIDENTS

Wilmar has conducted annual child safety assessments since 2018. The focus on child safety and accident prevention involving children in our estates has been effective, with a reduction in incidents from 2018 to 2019. Measures that have contributed to this are:

### 1. Creating Safer Environments for Children

Road related incidents were the biggest threats to children on our estates. Wilmar has implemented safety measures to mitigate vehicles transporting heavy equipment, including gates, speed bumps and pedestrian paths around residential areas, creches, and schools. Trucks and heavy equipment must be placed in designated parking areas away from residents and children. For other risks we have also filled unused open ponds and erected warning signs around open bodies of water.

### 2. Educating Caretakers and Children

Wilmar provided training to schools, parents and children on safety around plantations—especially in relation to food handling, fire, natural disasters, and haze. Furthermore, we educated students at Wilmar-owned schools on sexual harassment issues.

### 3. Protecting the Health of Children and Families

Wilmar implemented an immunisation programme for children at our Sabahmas Estate and all estates in Indonesia, and worm prevention medication was offered to children at our Kiabau estate. We also provided families of all employees with face masks as protection from haze pollution in Indonesia.

## Birth Registration

Low rates of birth registration, particularly in remote areas where access to services can be difficult, is a challenge in Indonesia. It is estimated that only 58% of children in Indonesia under 5 years old from rural areas are registered, compared to 76% in urban areas<sup>15</sup>. Lack of birth registration prevents children from accessing basic services, such as health, education, and social services, which increases the risk of being forced into child labour, trafficking and other forms of exploitation and abuse.

Companies can play a vital role in supporting birth registration by providing logistical support including transport to birth registration centres, paid leave for the purpose of registering childbirth, and assistance to workers to understand birth registration requirements.



### WHAT CAN COMPANIES DO?

- Provide transportation to birth registration centres and offer assistance to cover partial or full costs of registration.
- Provide paid leave for the purpose of registering childbirth.
- Provide assistance to workers who have difficulties understanding birth registration and explain documentation requirements to workers.
- Work with local authorities to encourage registration efforts in workers' communities.

<sup>15</sup> [Palm Oil and Children in Indonesia: Exploring the Sector's Impact on Children's Rights, UNICEF Indonesia \(2016\)](#)

## Household Safety in Plantation Communities

Households in plantation communities may sometimes be unsafe for children, particularly if they are not protected from contact with work equipment (such as harvesting tools stored at or near the home). Safety hazards could include latent exposure to chemicals on personal protective equipment (PPE) that may be brought home, or accidents caused by sharp or heavy work tools left around or near houses / play areas, as well as the spread of disease and infection from a sick parent to a child. In addition, plantation workers may be unaware of the importance of sanitation, hygiene, and nutrition for the health and wellbeing of their children.

### WHAT CAN COMPANIES DO?

- If specific storage areas are not able to be provided for workers to store their tools, provide training on how to safely maintain and store their work equipment at home, including ensuring that the PPE and work tools are cleaned properly and kept out of reach of children.
- Provide basic health and first aid training to parents, including information on how to avoid the spread of disease through handwashing, avoiding physical contact when infectious, and when to seek medical advice. Training should also include guidance on how to protect the health of children during forest fires and haze (e.g. caused by slash-and-burn) with face masks.
- Provide workers with basic training on the principles of good nutrition, including hygienic food preparation and balanced dietary requirements that include fresh fruit and vegetables and limited processed / packaged food.
- Include housing as part of buildings assessed and audited for hazards and ensure housing design and maintenance accommodate safety concerns around fire safety.



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## Section II: Put in Place Policies and Procedures to Protect Children

Child protection is everyone's responsibility. Wilmar requires its business operations, its suppliers, and its contractors to address potential and actual risks to children's safety and ensure that children are protected from violence, exploitation and violations of their rights. This applies not only to a company's operations in working hours, but also to any facility owned or operated by a company.

All of Wilmar's suppliers and contractors are required to adhere to Wilmar's Child Protection Policy. The following section has been based on [UNICEF's Child Safeguarding Toolkit for Business](#) (2018), which outlines six practical steps that companies should take to protect and safeguard children in their operations and supply chains.



## 1. Conduct a Child Protection Risk Assessment

In order to understand how business activities, employees or representatives pose risks to children, it is essential to conduct a risk assessment. A risk assessment can take the form of either a standalone self-assessment or integrated in an existing risk management or impact assessment process. Such assessments are an important first step in determining the level of risk through engagement of company employees, suppliers, and contractors with children. In Wilmar's own operations, a child specific risk assessment and review, is conducted annually. It is not compulsory for companies to conduct a risk assessment annually, as long as there is a clear way to review the risks at regular and defined intervals and how to mitigate them.

### HOW TO CONDUCT A CHILD PROTECTION RISK ASSESSMENT

#### *i. Identify and map all the opportunities for direct or indirect contact with children*

Examples of direct contact and potential risks include:

- Interacting with children living in or nearby plantation communities, either off-hours or during the course of regular job duties (e.g. bus drivers for the school bus service who are employed by the company)
- Providing care for a child, as part of regular job duties or a dedicated childcare role (e.g. creche workers who are employed by the company)

Examples of indirect contact and potential risks include:

- Communicating with children through online platforms (e.g., an employee sends a message to a child through social media)
- Having access to children's data or images / videos of children (e.g., a company has private information on workers' children and shares this with a third party without their consent)

#### *ii. For each direct and indirect contact opportunity identified above, the following questions should be answered:*

- What is the type of activity and where does this contact occur?
- Who is involved in this activity?
- What is the frequency of this engagement with children and / or young people?
- Does contact with children and / or young people require or allow employees or representatives to be alone with children? If so, how?
- What are the potential risks to children and / or young people due to that contact?

By answering the above questions, businesses will be able to identify where there is engagement between children and its employees.



### iii. *Engage with external child protection experts to conduct the assessment*

Working with qualified child rights / child protection professionals and experts can help businesses to increase their awareness of all the ways in which their actions and facilities impact children by building a fuller picture of how companies cause and contribute to risks. Qualified experts can also ensure safe and meaningful participation of children in the assessment.

With this in mind, civil society organisations can guide businesses to put policies and standards in place that protect working and other children in and around their facilities; raise and monitor safety and protection concerns expressed by children and members of the community; help businesses enforce laws and policies that protect children from abuse and exploitation; and provide advocacy expertise and training to assist companies and children alike in advancing children's right to be protected from all forms of violence and exploitation.

## 2. Conduct a Gap Analysis of Existing Policies and Practices

Conducting a gap analysis to map internal policies and processes in place can enable a business to understand the extent to which child protection has been integrated into its risk assessment and management processes.

### HOW TO CONDUCT A GAP ANALYSIS OF POLICIES AND PRACTICES

#### i. *Review current legal and regulatory statutes*

This should include a benchmark of legislation related to child protection and abuse and how existing policies and practices meet Indonesia's national legal frameworks.

#### ii. *Understand legal requirements for the protection of children in Indonesia and assess management practices that go beyond legal compliance*

This should include a review of:

- Existing policies and practices across the company to determine where considerations related to child protection are already stated or where they could and should be added
- Any guidance for high risk positions (for example, employees who are in direct contact with children)
- Policies and codes of conduct applicable to any business relationships and how these are communicated to employees and suppliers alike.

## Gap Analysis Checklist

- Is there a governance structure to address and manage child protection within the company?
- Is child protection covered in its own standalone policy or integrated in other company codes of conduct?
- Is there a policy on responsible recruitment where vetting / background checks are carried out on existing and prospective employees / associates?
- Does the company make provisions for training of employees and suppliers on child protection, especially those who come into direct and indirect contact with children?
- Are there existing channels for the receipt of complaints / concerns on potential exploitation or abuse of children?
- Is there a point person who is trained and able to deal with child protection issues?

### 3. Develop a policy commitment

A policy commitment is a statement that sets out a business's responsibility to respect rights, including children's rights, as described in the [UN Guiding Principles on Business and Human Rights](#). A child protection policy should be approved at the senior level of the business, informed by relevant internal or external expertise and embedded across all departments and areas of operation. It should clarify the business's expectations of employees, suppliers and others directly linked to its operations. It should be communicated internally and externally, and ideally be publicly available.

## HOW TO DEVELOP A CHILD PROTECTION POLICY

- Statement of commitment: Outline why child protection is important for the company and how it will meet its responsibilities
- Identification of Risks: Describe the risks related to child protection and the ways in which the company interacts with children. This does not have to be indicated in the policy, but is a helpful step in developing a policy that addresses key concerns
- Definitions of key terms and concepts: Provide a glossary of terms aligned with the legal framework (e.g. the definition of and age range of child worker)
- Scope of Commitment: Define who the policy applies to. For example, employees, suppliers and persons who routinely or indirectly interact with children.
- Statement of duty of care: Describe the duty of care and legal obligations that your company will adhere to in order to prevent and protect children from exploitation and abuse, such as child labour. Include detail on how the policy will be enforced and the consequences for any breaches (e.g. fines, penalties, termination / suspension of contracts with suppliers).

- Governance structure: Provide detail on the individual(s) and / or function(s) within the company that have ultimate responsibility for the implementation of the policy, including any senior officials who have oversight. This does not have to be directly captured in the policy but should at least be defined in the procedures or internal operational documentation.
- Reporting structure: Describe the process for internal and external stakeholders to raise concerns regarding the safety and security of children.
- Executive sign-off: Provide assurance that the policy has been approved and endorsed by the most senior officials in the company, for example, the CEO or Chairperson of the Board

*For an example of a child protection policy, see [Wilmar's Child Protection Policy](#).*

#### 4. Develop an Implementation Plan

An implementation plan details how to operationalise a Child Protection Policy. It should be led from the top and from the bottom: senior leadership should be onboard, and all staff need to be aware and invested in the success of the policy. The implementation plan should also describe how the policy will be embedded in the company, through existing management systems and processes like recruitment and hiring.

### HOW TO DEVELOP A CHILD PROTECTION POLICY IMPLEMENTATION PLAN

#### *i. Establish a Governance Structure for Child Protection*

Governance structures should include allocation of dedicated staff resources in the organisation with child protection responsibilities and an appropriate level of knowledge. Child protection should also be added to the mandate of the chief risk officer or risk council of the company, as appropriate.

A network of child protection representatives should be established so that there is a minimum of one at each site of operation; they can report directly to the child protection lead at HQ and provide visibility on child protection issues across the organisation. These responsibilities could be in addition to the individuals' regular day job (e.g. creche worker).

#### *ii. Open to external partnerships with local child protection experts to increase line-of-sight on child protection issues*

These partnerships could help the company to resolve some of the more complex issues that may arise and provide referral services for children who have been harmed.

### *iii. Embed the policy within the company's existing management systems*

The human resources department has a particularly important role to play. The company's commitment to child protection should be communicated to all staff and to potential recruits through the following channels:

- Continuous training: Staff member(s) with access to children should be given specific training on child protection, as per the company's policy . This should include regular refresher sessions as needed and specialised training, where relevant
- Job advertisements: Include a link to the company's child protection policy in the advertisement, if the advertised position involves direct contact with children
- Application forms and self-disclosure: Require applicants who will be in direct contact with children to disclose any prior convictions related to arrest or criminal prosecution.
- Interviews: Test the applicant's knowledge and commitment to child protection through interview questions.
- References and background checks: Use these to ensure that applicants have no prior criminal record.
- Induction: Train all new applicants in the child protection policy.
- Monitoring and appraisal: Consider using performance indicators for individual performance that relate to the successful implementation of the child protection policy.

Policies and procedures that support this Child Protection Policy must also include the following, at a minimum: dangerous areas must be off-limits and clearly marked, with safety barriers; corporate facilities must not be used to abuse, exploit or otherwise harm children; staff must remain vigilant about the presence of children on and around company premises; and young workers must be protected from hazards. Companies must also make clear that violence, abuse and exploitation are never tolerated in the course of business activities.

### *iv. Conduct internal awareness raising within the company*

All staff should be trained on the Child Protection Policy, the relevance of child protection to the company, their responsibilities for child protection, how to spot child protection risks, and how to safely report a child protection issue.

## 5. Establish a Reporting Structure

A reporting structure should be in place to receive and respond to reports regarding a child's wellbeing. This process may already build on existing human resources policies regarding whistleblowing and grievance mechanism to handle any complaints from employees, suppliers or contractors. While this may build on existing reporting structures, a standalone structure may be designed to process claims that are solely related to child protection issues. It would then be important to liaise with external agencies including local authorities and child rights experts or NGOs that can advise on how to appropriately deal with these matters, including advice and referrals.

In all actions impacting children, the best interest of children should be the guiding principle. This means that during any decision-making process, the child's protection, preservation of well-being and right to live and grow in an environment that is favorable to his / her mental and physical development is prioritised. This should always ensure the appropriate level of confidentiality, fairness and transparency of processes are always exercised.

### CHILD PROTECTION REPORTING CHECKLIST

- The organisation has established a set of principles for these reports, including guarantee of non-reprisal against reporting staff; anonymity; safety; confidentiality; and fairness
- The organisation has respected the child's right to privacy and does not disclose any information of data relating to the child without prior knowledge and consent
- The organisation has assigned an individual who is responsible for receiving and resolving these reports
- The organisation has a clear and transparent procedure for dealing with a report

#### *Further reading*

- [UNICEF, Child Safeguarding Toolkit for Business, May 2018](#)
- [RSPO, Child Rights Guidance for Palm Oil Producers, December 2020](#)

## 6. Provide Guidance for Employees on how to Take Action

These are concrete actions that should be taken when concerns about a child's safety and wellbeing are raised. The concern can be dealt with via the company's whistleblowing policy or reporting structure so that employees and any stakeholders can report any potential concerns. It is important to note that the lead person responsible for child protection should not determine whether abuse or misconduct has taken place or not. It is their responsibility, however, to report any potential concerns to the relevant law enforcement bodies / authorities.

### EMPLOYEE ACTION CHECKLIST

- Ensure that all employees understand the role and responsibilities of the designated child protection lead, know how to contact him / her and any deputies in place
- Have a contact sheet with details of local authorities, law enforcement agencies, such as the police, social services etc. and relevant NGOs with child protection expertise
- A delegated child protection committee should include individuals who support the child protection lead and advise on best course of action for any potential incidents should they arise
- Develop a standard incident form to record any details of concerns raised and a system for securing this confidentially

#### *Further reading*

- [UNICEF, Child Safeguarding Toolkit for Business \(May 2018\)](#)



## Section III: Implementing Child Labour Remedial Action Guidelines

### The Situation of Child Labour in Indonesia's Palm Oil Industry

Child labour has been a longstanding concern in the palm oil industry. Child labour is most common among smallholder farmers than larger plantations. Nevertheless, in Indonesia's palm oil plantations, children are often engaged by family members as unpaid helpers, known as *kernet* workers, often without the knowledge of the company.

According to UNICEF, statistics indicate that over 5 percent of children in Indonesia aged between 5 to 17 are in child labour. Over 60 percent of these children are in agricultural industries such as palm oil<sup>16</sup>. Most children working in palm oil plantation are picking or collecting palm fruit; carrying sacks of fruit; and pushing carts of fruit to collection sites.

Children working in palm oil face many hazards to their health and safety. Carrying heavy loads can damage children's growing bodies; using dangerous equipment such as sharp blades to harvest oil palm can permanently injure them; exposure to toxic pesticides can poison children and cause life-long health issues; and excessive physical exertion can leave children too tired to study and attend school.

Child labour most often occurs due to poverty and lack of educational opportunities. Children often work to supplement family incomes. Low wages for parents working in the industry and demanding harvesting quotas also motivate parents to recruit their children as *kernet* workers. Lack of educational opportunities, especially in remote areas, means that children drop out of school at an early age to enter work in the palm oil industry.

### What is Child Labour?

The term 'child labour' is often defined as work that deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development. It refers to work that:

- is mentally, physically, socially or morally dangerous and harmful to children; and
- interferes with their schooling by depriving them of the opportunity to attend school; obliging them to leave school prematurely; or requiring them to attempt to combine school attendance with excessively long and heavy work.

All work that is harmful to children is child labour. But not all work is harmful to children. Age-appropriate tasks that do not interfere with school and leisure time can be a positive part of growing up. From a young age, many children complete domestic chores, run errands, or assist their parents in the family farm or business, gaining skills they will need as future workers and community members.

<sup>16</sup> [UNICEF, Palm Oil and Children in Indonesia: Exploring the Sector's Impact on Children's Rights \(2016\)](#)

Whether or not children's work can be called 'child labour' depends on the child's age, the hours of work, and the conditions under which it is performed. The following terms are important to understand when child work becomes child labour:

### Wilmar's 'No Child Labour' Clause

Wilmar recognises the minimum age for full employment as 18 years old. Noting the ILO Minimum Age Convention, 1973 (No. 138) defining 15 years old as the minimum age of work, where local regulations allow the employment of young persons between the ages of 15 to 17 years old.

Any person who are of legal working age but below 18 years old are considered as 'young workers' and may participate in non-hazardous work under the supervision of an adult. The work must not negatively impact the young worker's health, safety, personal development, education, and right to play.

Wilmar will only allow 'young workers' where the local minimum school age is below 15 years old, and where there is local regulation requiring specific consideration and controls for appropriate safeguards for young persons, which includes but not limited to, limited working hours, no work at night, no heavy work, and safe work. Development of localised specific guidelines are required for this allocation. In any event, Wilmar will comply with the safeguards in ILO Convention 182 against the worst forms of child labour. This is consistent with regulations in countries like Indonesia.

### INDONESIA'S LAWS ON CHILD LABOUR

Indonesia has strong laws and policies against child labour. The government ratified major international treaties on child labour, including ILO Conventions No. 138 on Minimum Age of Employment, 182 on the Worst Forms of Child Labour.

Under the Manpower Act, 18 is the minimum age for full time employment. Children aged 13 to 15 years may perform only light work that is not dangerous and does not interfere with schooling. Ministerial Decree No. 235 also prohibits hazardous occupations and activities for children under 18, including jobs where there are physical hazards, chemical hazards, or that are by nature hazardous.

## Policies and Procedures to Prevent Child Labour

The best way to address child labour is to prevent it. As a starting point, all Wilmar staff, suppliers and contractors need to ensure that children are not working in their facilities or operations. This section sets out guidance for suppliers and contractors on how to identify child labour risks and prevent them.

1. Define hiring policies and procedures: Implement a policy on minimum age for employment to ensure that the company does not hire children below the minimum age or in conditions of child labour.

The policy can be a stand-alone commitment or integrated into existing policies governing recruitment and human resources management. To ensure compliance, employees should be offered training on the policy and held accountable for its implementation.

2. Verify the ages of employees: Age verification procedures are important to ensure that the company does not inadvertently hire children. Without proof of age, the company cannot decide if the work is suitable for the worker. Sometimes, adolescents may present false identification in order to obtain employment, so this step is a critical safeguard to preventing child labour. Age verification procedures can include but are not limited to:
  - Reviewing the personnel records to identify whether there are child workers
  - Developing and communicating the company's policy for prohibition of child labour
  - Putting in place a requirement that all workers to show proof of ID during recruitment
  - Establishing human resources record keeping procedures

Reliable techniques to verify workers' ages include:

- Checking reliable forms of identification, ideally photo ID cards such as the Resident Identity Card (*Kartu Tanda Penduduk*) or birth certificates or passports
- Requesting submission of school certificates
- Using targeted questions to interview applicants who appear below the minimum age. E.g. applicant's background such as education history, family members and so on to assess if the applicant is being honest about his / her age

3. Carry out a workplace assessment: Identifying hazardous work in the company – work that should never be carried out by children – is an important step towards preventing child labour.

Carry out a workplace assessment to identify hazards and determine which forms of work are hazardous and should be prohibited for children. This can be achieved through observation and by consulting staff, workers, workers' representatives, labour inspectors and other relevant stakeholders.

As mentioned above, while young workers above the minimum age for work are allowed to take on non-hazardous work under strict conditions, they have the right to be protected from any type of work or employment which is likely to jeopardise their health, safety or morals. Suppliers should ensure that young workers are treated according to the law, including measures to avoid hazardous jobs and provision of decent working conditions.

## CHILD MARRIAGE AND CHILD LABOUR

In 2019, Indonesia raised the legal age of marriage for girls, from 16 to 19 . However, in some parts of Indonesia, child marriages is still a common practice.

There can sometimes be a misconception that married persons under the age of 18 should be treated as adults in recruitment or hiring. However, international and national laws do not make an exception for child labour on the basis of marriage.

Wilmar also does not recognise an exception based on marriage. Young workers aged between 15 to 18 can only be employed under strict conditions, as stipulated in Wilmar's No Child Labour clause and consistent with ILO safeguards.

### Remedial Action Guidelines

This section sets out the operational principles and procedures on how to treat instances of child labour when it cannot be prevented. These procedures apply to Wilmar's operations and all its suppliers and contractors. Though this guidance does not set out how to tackle the root causes of child labour, it seeks to guide remediation on a case-by-case basis while dealing with some of the most common challenges.

## WHAT IS A CHILD LABOUR REMEDIATION PLAN?

A Child Labour Remediation Plan is a set of operational procedures to guide the company's response to establish the long-term best interest of the child once instances of child labour are identified. Qualified organisations or a third-party service provider can be engaged in the development of the remediation plan. Necessary budgets should be allocated to ensure the remediation plan runs smoothly. The remediation plan should be personalised and may or may not conclude when the child reaches the minimum working age.

If child labour is found, it is imperative to act swiftly to find a solution. It should be considered given the specific circumstances of each child or group of children, such as age, gender, level of maturity, vulnerability, race or ethnicity, the social and cultural context, among other factors.

Additionally, where it has been found that there are young workers involved in hazardous work, the remediation proposal should include a discussion with the child's parents or guardians on assigning young workers to undertake non-hazardous work with adult supervision.

Wilmar is committed to working with its suppliers in situations where child labour have been found, to develop and implement systems to correct such violations and to build systems aimed at reducing child labour on a systematic basis.

Where appropriate, Wilmar will provide technical assistance to help suppliers with known violations to address specific issues; and provide technical assistance on broader labour issues that underlie child / forced labour (e.g., workplace cooperation, health and safety, working conditions).

For child violations i.e. harassment and abuse, child protection procedures should apply, which includes reporting the case to the authority through formal channels. Corrective actions has to be implemented and to develop a remediation action plan, covering the following actions:

#### Identify Potential Child Labourers

If workers are suspected to be underage, it is strongly advised to not approach them directly in the first instance. Their IDs should be checked as part of a routine document check process and any facts should be established by interviewing people close to the suspected underage worker.

The age and identity of the child should be clarified upon review and verification of age and identity documents. Note that, if children do not have identity documents, it will be more difficult to ascertain actual age. If the identity and age of the child cannot be determined, the following actions should be taken:

- Communicate or meet with parents or guardians if they can be located
- If ID checks are inconclusive, contact local labour authorities to validate identification
- Assess age through other documents, such as school certificates

Identifying the age of the child is important as this will determine the most appropriate approach in the remediation plan.

#### Remove the Child from Work Immediately

Children should be immediately removed from work and placed in a safe environment. The reasons for discontinuing work should be clearly explained to children in the presence of trained experts or qualified individuals or organisations with experience working in child welfare. The legal requirements and Wilmar's Child Protection Policy should be explained to the child, as should their ability to be employed once they reach the appropriate minimum age.

#### **Actions to Avoid**

It is very important that the company does not:

- Expel any of the suspected or confirmed child laborers
- Threaten the children or their families or hamper the progress of investigation and remediation
- Conceal or falsify any information and documentation

Although children should be removed from work, it is important not to expel their family members from employment. Keeping their family members in employment increases the likelihood of a sustainable remediation plan.

## Develop a Remediation Plan that Accounts for the Best Interests of the Child

It is vital to listen and respond to the views of the child and his / her parents or guardians when determining options for remediation and measures to be put in place. Their agreement should be sought to participate in the remediation programme, maintaining awareness of situations which may present risks and manage these.

It is also important to determine the best approach for the child's age. Older children above the minimum school leaving age could be assisted with accessing vocational training and entering age-appropriate work, while younger children should be supported with re-entering school.

The remediation plan should be agreed upon (signed) by both the company and the affected party in order to formalise the obligations embodied in the plan.

- **Assemble a remediation team to deal with child labour and children's welfare**

Qualified individuals and organisations that may be engaged in developing the plan include local NGOs, members of women's committees, government officials, health professionals, education professionals, social workers or other knowledgeable individuals. The team must maintain a commitment keeping the best interest of the child in mind.

In Indonesia, there are several government bodies, NGOs, and initiatives tackling child labour. Therefore, it is important to map and prioritise stakeholders to coordinate efforts in addressing the issue. Once the stakeholders are identified, roles and responsibilities of each stakeholder should be defined while establishing how the remediation programme will be funded.

- **Investigate the situation of the child, including needs, circumstances, and aspirations of the child**

The investigation should incorporate dialogue with the child and parents to understand his / her views and desires. If relevant, it is important to understand why the child stopped attending school and entered the workforce, and any obstacles that might exist to re-entering education.

If the child has expressed that he / she does not want to go to school, it is important to understand the child's reasons. Some children may experience bullying or abuse in school. In the case of migrant children, they may face obstacles with enrolment and understanding local languages. Understanding the reasons behind absenteeism can ensure that the child is able access educational opportunities that suits his / her specific needs.



- **Define and implement an appropriate remediation plan**

Ensuring the best interests of the child must be the first priority for any remediation plan.

If the child is to be supported in returning to education, a school or training facility should be identified appropriate to the child's age and needs. If the child is approaching the minimum age of employment, professional / vocational training could be offered if they choose to return to age-appropriate work.

Appropriate accommodation should be arranged for the child, particularly if the child is living without his / her parents. If the child lives away from home, with or without their families, it is imperative to assess educational facilities both in the child's main residence and in the host territory.

The supplier may agree to re-hire the child when he / she reaches the legal working age, should the child desire to re-enter employment. This step could provide the child with an important incentive to finish education, rather than searching for work elsewhere.

It is also important to obtain signed agreements from the child's parents or guardians, setting out the elements or stages of the remediation plan and the duties of each party.

Parents and children should always be consulted, and their consent obtained for any remediation plan before implementation. In cases where parents have sent their child away from home to work, this process of persuasion may be difficult, and it is particularly important to ensure that parents are confident that the family's income will not be reduced by participating in the remediation plan.

- **Reach an agreement on how remediation costs will be funded**

Companies should fund education costs and travel expenses to the child or his / her family. This should continue until the child reaches the minimum working age or finishes the agreed training / educational/tutoring course in the remediation programme, whichever is longest. The supplier should also cover any expenses to monitoring and follow up on the remediation plan. To achieve this, it is advisable for suppliers to allocate budget to cover remediation costs.

A payment of a stipend should be made to the child both during the investigation and throughout the remediation plan. The stipend should be equivalent to the amount the child was earning whilst employed, or at least local minimum wage standard, whichever is higher. The stipend should be paid in weekly or monthly, rather than as a lump sum.

In the case of children working to help parents (e.g., *kernet* workers), there should be efforts to develop alternative solutions agreed with the child and his / her family. For example, employment of an unemployed adult family member in place of the child labourer may be a sustainable solution.

## Monitor Implementation of the Remediation Plan and Provide Ongoing Support to the Child.

Successful remediation is dependent on ongoing monitoring to ensure that the child remains in school and that the programme is adjusted to meet the child's changing needs.

A monitoring report should be developed and distributed to stakeholders to be kept informed of progress to encourage accountability.

Monitoring includes the following elements:

- Monitoring of the child's progress at school (*if applicable*)
- Collaboration with parents or child welfare officials to conduct regular home and school visits
- Regular payment of stipend, school fees and any other expenses

The monitoring findings should then be used to strengthen the remediation programme.

- Partnerships and collaboration

Working with external stakeholders, such as workers' unions or NGOs in palm oil communities could further strengthen education systems and health care systems, while working to ensure that childcare provision works for working parents, for example, ensuring that it is provided for in a place that is easily accessible and suits their working patterns. More resilient communities around the work sites will result in a stronger workforce and more resilient and productive plantations. Where possible, Wilmar can assist with including supplier companies in external partnerships and collaborations that Wilmar is part of.

It is also important to invest in greater awareness and understanding of the issues affecting children on plantations as well as establish / increase collaboration with industry associations to learn from best practices and formulate solutions.

- Root causes of child labour

While working to develop long-term solutions, it is essential to understand the drivers behind child labour, taking into consideration the child's circumstances, economic background, and family life. With the support of appropriate specialists who are familiar with the local contexts and issues, remediation programmes and monitoring will have to consider the drivers as a measure to prevent the child from entering work again. Specialist support may be needed to gain a greater understanding of the wider context and circumstances.

### *Further reading*

- [ILO IOE Child Labour Guidance Tool for Business, 2015](#)
- [ILO Checkpoints for Companies: Eliminating and Preventing Child Labour, 2016](#)
- [ILO Age Verification: Protection for Unregistered Children from Child Labour, 2016](#)
- [ILO Helpdesk Q&As on Business and Child Labour](#)

## ANNEX I – Standalone Illustrated Guidance for Implementing Child Protection in Estates



# 1. IDENTIFY CHILDREN AT RISK

## A Collate

A LIST OF POTENTIALLY AFFECTED CHILDREN



## B Clarify

AGE & IDENTITY OF CHILD



# 2. REMOVE THE CHILD FROM WORK IMMEDIATELY

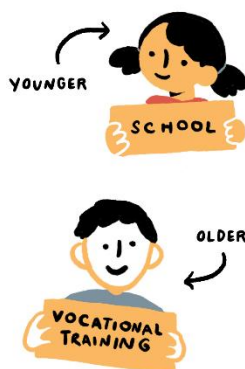
## A Place

THE CHILD IN A SAFE ENVIRONMENT



## B Transfer

CHILDREN INTO SCHOOL



## C Ensure

THE COMPANY DOES NOT:





### 3. DEVELOP A PLAN THAT ENSURES THE CHILD'S WELLBEING

**LISTEN AND RESPOND TO THE VIEWS OF THE CHILD TO ENSURE THAT THE CHILD'S BEST INTERESTS ARE CENTRAL TO THE PLAN.**

**IN ADDITION:**



#### **A ASSEMBLE A REMEDIATION TEAM**

HEALTHCARE PROFESSIONALS      NGOS      EDUCATION PROFESSIONALS



#### **B INVESTIGATE THE SITUATION OF THE CHILD**



#### **C DEFINE AND IMPLEMENT THE PLAN, OBTAINING SIGNED AGREEMENTS FROM THE CHILD'S GUARDIANS.**

**INCLUDE:**

- STAGES OF PLAN
- DUTIES OF EACH PARTY



#### **D REACH AN AGREEMENT ON HOW REMEDIATION COSTS WILL BE FUNDED**



## 4. MONITOR THE PLAN & PROVIDE ONGOING SUPPORT

### Successful Remediation & MONITORING INCLUDES:



DEVELOP & DISTRIBUTE  
MONITORING REPORT TO  
STAKEHOLDERS TO ENCOURAGE  
ACCOUNTABILITY.



CHECK UP ON THE  
CHILD'S PROGRESS  
AT SCHOOL



ADJUST  
PROGRAMMING TO  
MEET CHILD'S  
CHANGING NEEDS

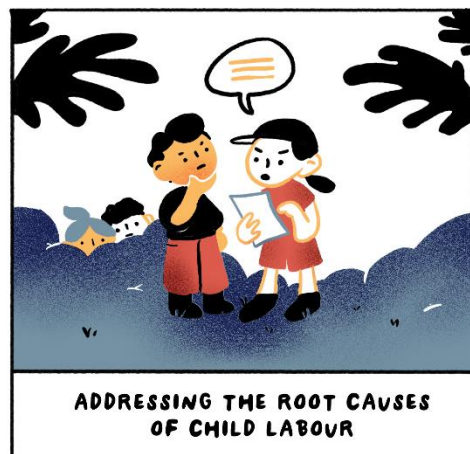


CONDUCT  
REGULAR HOME  
AND SCHOOL VISITS



PROVIDE REGULAR  
PAYMENT OF  
STIPENDS, SCHOOL  
FEES AND ANY  
OTHER EXPENSES

SUCCESSFUL REMEDIATION SHOULD BE SUPPORTED BY:







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