



REPUBLIC OF ZAMBIA

OFFICE OF THE AUDITOR GENERAL

PERFORMANCE AUDIT REPORT ON GOVERNMENT MEASURES TO REDUCE INCIDENCES OF CHILD LABOUR IN ZAMBIA 2018 -2022



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DEFINITION OF TERMS

Term	Definition
Child Labour	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/or 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 ¹ .
Formal Sector	A sector in which a worker: <ol style="list-style-type: none"> i. Has a formal contract with the employer; ii. Has pre-defined work conditions and job responsibilities; iii. Gets an assured and decent fixed salary; iv. Has fixed duration of work time, and v. Is covered by a social security for health life risks.
Hazardous Work	Work that is carried out in conditions likely to harm the health or safety of children. ²
Informal Sector	A sector in which a worker: <ol style="list-style-type: none"> i. Has no formal contract with the employer; ii. Has no pre-defined work conditions and job responsibilities; iii. Gets irregular and unevenly paid; iv. Has no forum to express his grievances; v. Has no fixed duration of work time and vi. Is not covered by a social security for health life risks.
Labour Inspector	An Officer responsible for enforcing labour legislation and providing information and advice on ways in which to comply with legislation.
Labour Officer	An Officer responsible for undertaking and participating in the design, implementation and monitoring of industrial relations programmes and activities in order to ensure industrial harmony.
Light work	This is work which is not likely – <ol style="list-style-type: none"> i. To be harmful to the health or development of a child or young person ii. To prejudice the attendance at school, participation in vocational orientation, or a training programme

¹ <https://www.ilo.org/ipec/facts/lang--en/index.htm#:~:text=The%20term%20%E2%80%9Cchild,sectors%20within%20countries>

² Ministry of labour and Social Security Annual Child Labour Report 2018

Term	Definition
	approved by the competent authority of a child or young person.
Rehabilitation	Provision of education and financial assistance to children that have been withdrawn from child labour
Reintegrated	Placing a child who was engaged in child labour into a safe environment where they can have their rights fulfilled and receive the support needed to reach their full potential.
Withdrawal	Removal of children from incidences of child labour

ACRONYMS

7NDP	Seventh National Development Plan
8NDP	Eight National Development Plan
ARISE	Achieving Reduction of Child Labour in Support of Education
CCLC	Community Child Labour Committee
CRUPLE	Combined Rate of Unemployment and Potential Labour Force
DCLC	District Child Labour Committees
DLO	District Labour Officer
ILO	International Labour Organisation
INTOSAI	International Organisation for Supreme Audit Institutions
JCM	Jesus Cares Ministries
MLSS	Ministry of Labour and Social Security
MCDSS	Ministry of Community Development and Social Services
MYSA	Ministry of Youth, Sport and Arts
OAG	Office of the Auditor General
OSHS	Occupational Safety and Health Services
NAP	National Action Plan
NCCC	National Coordination Committee for Children
NCLSC	National Child Labour Steering Committee
NGOs	Non-Governmental Organisations
NPDD	National Productivity Development Department
NSC	National Steering Committee
SPRIZ	Support for Poverty Reduction in Zambia
TWG	Technical Working Group
YWCA	Young Women's Christian Association
ZamStats	Zambia Statistical Agency
ZANIS	Zambia National Information Services

PREFACE

I am pleased to publish and submit the Performance Audit Report on Government Measures to Reduce Incidences of Child Labour Cases in Zambia. The Office of the Auditor General is mandated to carry out Performance Audits in Ministries, Provinces and Agencies (MPAs) and to report the results to the President and Parliament for debate. With this mandate, my Office conducted a performance audit for purposes of assessing the effectiveness of measures put in place by Ministry of Labour and Social Services to reduce incidences of child labour in Zambia.

Zambia, being a developing country faces many challenges regarding child labour. There have been reported cases of children engaged in activities such as stone crushing, tobacco farming, illegal mining to mention a few. Therefore, this audit is cardinal as the country has put in place laws and policies that seek to address issues relating to child labour such as the Employment of Young Persons and Children Cap 274 amended Act No.10 of 2004, Children's Code Bill 2022 and the Employment Act Cap 268 of the Laws of Zambia which prohibit the employment of any person under the age of 15, which is the maximum age description of a child in Zambia.

As Zambia seeks to attain the Sustainable Development Goals, it is imperative that my Office audits the implementation of Sustainable Development Goals. Therefore, the audit on Child Labour is in line with Sustainable Development Goal No. 8: Decent Work and Economic Growth - Target 8.7 which aims to eliminate the worst forms of child labour.

It is my sincere hope that the recommendations put forward in the report will improve the performance of Ministry of Labour and Social Services in reducing child labour incidences to enable achievement of objectives. I wish to thank the Ministry of Labour and Social Security and all stakeholders for the support rendered during the audit.



Dr. Dick Chellah Sichembe
AUDITOR GENERAL

EXECUTIVE SUMMARY

1. Background

There are a number of impediments to the growth of children in every society. One of these impediments 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/or 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 work³. In the world, 160 million children – 63 million girls and 97 million boys – engage in child labour accounting for almost 1 in 10 of all children worldwide nearly half of whom 79 million children are in hazardous work.

2. Audit Objective

The audit objective was to assess the effectiveness of measures put in place by Ministry of Labour and Social Services to reduce incidences of child labour in Zambia.

3. Audit Criteria and Scope

The audit criteria for which the MLSS was assessed was drawn from the following sources: National Child Labour Policy; Ministry of Labour and Social Security Strategic Plan 2017-2021; International Labour Organisation – Handbook for District Child Labour Committees 2008; National Action Plan on Child Labour 2010 – 2015; National Action Plan on Child Labour 2020 – 2025; and the Children’s Code Bill, 2022.

The audit covered the period 2018 to 2022 and examined the programmes implemented by the MLSS to reduce child labour incidences in Zambia. The audit focused on legislative and policy framework, prevention and enforcement programmes and coordination mechanisms in place to reduce child labour.

4. Audit Findings

The audit established that the Ministry had established the National Steering Committee on Child labour, however, the committee was inactive and there were no minutes provided to show what activities or interventions the Ministry was carrying out in curbing child labour. The audit also revealed that although the Ministry of Labour and Social Security had an establishment of twenty-two (22) District Child Labour Committees out of the fifty-four (54) districts in which they had presence, only four (4) districts had active District Child Labour Committees namely Kaoma, Nkeyema, Chipata and Kasama districts.

³ <https://www.ilo.org/ipec/facts/lang--en/index.htm#:~:text=The%20term%20%E2%80%9Cchild,sectors%20within%20countries>

Further, the Ministry did not have a data capture and monitoring tool for child labour cases. Interviews revealed that the Ministry relied on Cooperating Partners to provide information on reported incidences of child labour in the districts. The audit also revealed that there was no system in place to track and follow up children that had been withdrawn from child labour either by the Ministry or other Cooperating Partners.

The audit revealed that the Ministry had not developed a national database and information system on child labour cases. However, as at December 2022, the Ministry of Labour and Social Security had developed a Labour Market Information System (LMIS) to help maintain a national database of labour cases. The Ministry did not adequately undertake child labour inspections which were meant to monitor, manage and control incidences of child labour as they did not meet the targeted number of inspections. This was due to inadequate labour inspectors to coordinate and investigate child labour cases in the districts visited thereby affecting coverage of children in the communities.

There was low coverage of programmes relating to child labour carried out by the Ministry. During the period under review, the Ministry of Labour and Social Security in collaboration with key stakeholders did not conduct regular monitoring of various programmes, projects and activities pertaining to the reduction of child labour as most projects with stakeholder were discontinued in 2018.

5. Conclusion

The audit concludes that although the Ministry of Labour and Social Security has put in place measures to reduce incidences of child labour, the measures in place have not been effective to reduce incidences of child labour in the Zambia.

6. Recommendations

The audit recommends that the Ministry of Labour and Social Security prioritises available resources to implement child labour programmes by:

- i. Ensuring Labour Officers' capacity is built through provision of training programmes;
- ii. Ensuring guidelines are in place to provide for child labour inspections in the informal sector;
- iii. Ensuring that activities centred around child labour are planned and implemented using a multi sectoral approach with relevant stakeholders;
- iv. Monitoring project implementers to validate data and statistics obtained; and
- v. Leveraging on their coordination with relevant stakeholders to enhance awareness of child labour.

CHAPTER ONE: INTRODUCTION

1.0. Overview

This chapter highlights the mandate of the Office of the Auditor General (OAG), the background and motivation of the audit and the expected benefit of the audit to society. The title of the audit is “Government Measures to Reduce Incidences of Child Labour Cases in Zambia” which is under the jurisdiction of the Ministry of Labour and Social Security (MLSS).

1.1. Mandate

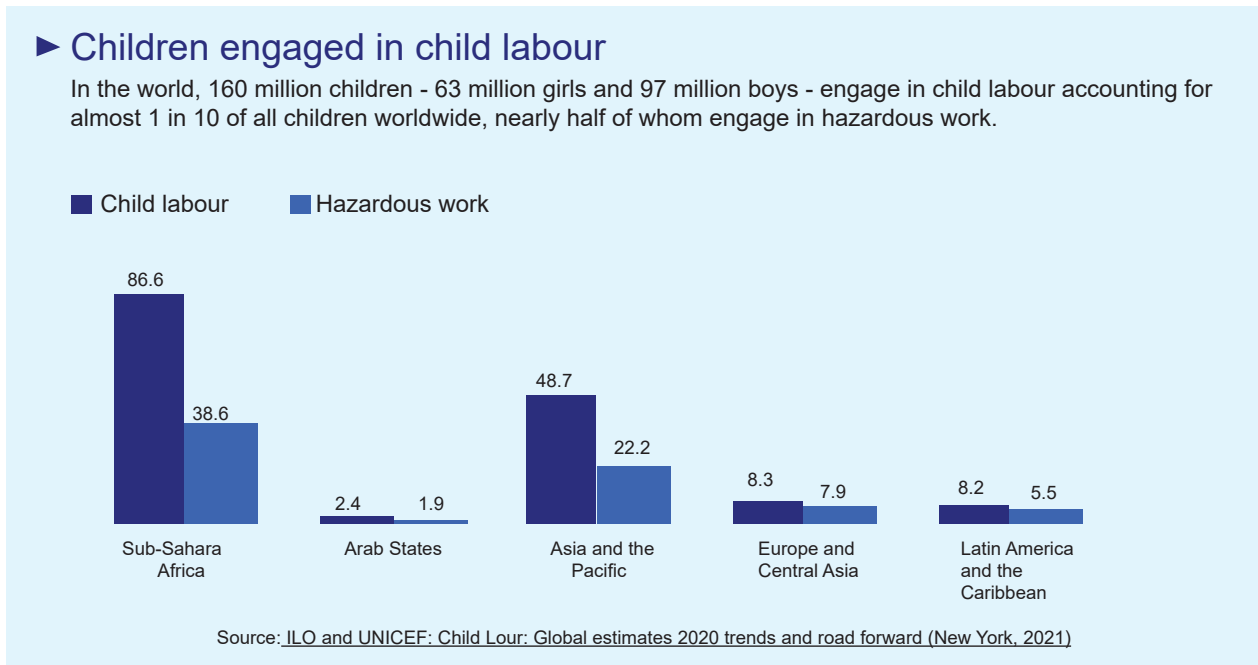
In accordance with the provisions of Article 250 of the Constitution of Zambia (Amendment) Act No.2 of 2016, Public Audit Cap 378 and Public Finance Management Act No.1 of 2018, the OAG is mandated to carry out performance audits in Ministries, Provinces and Agencies (MPAs) and to report the results to the President and Parliament for debate. With this mandate, the OAG conducted a performance audit to assess whether measures put in place by the Ministry of Labour and Social Security (MLSS) to reduce child labour incidences were effective.

1.2. Background

There are a number of impediments to the growth of children in every society. One of these impediments is child labour. Child labour is commonly driven by family and community poverty, paired with lack of access to decent work for adults and youth which result in income insecurity, weak social protection, lack of free quality education and other public services. At the global level, 160 million children – 63 million girls and 97 million boys – engage in child labour accounting for almost 1 in 10 of all children worldwide as of 2020 nearly half of whom are in hazardous work. Figure 1.1 below shows the global estimates of child labour in 2020. ⁴

⁴ ILO and UNICEF: Child Labour: Global Estimates 2020

Figure 1. 1: Global Estimates of Child Labour, 2020



Source: ILO and UNICEF: Child Labour Global Estimates 2020

Zambia, being a developing country also faces many challenges on child labour. According to the 2020 Labour Force Survey, the Combined Rate of Unemployment and Potential Labour Force (CRUPLE) as at the end of 2020 stood at 37.3%. Youth CRUPLE stood at 46.9%. The rate of unemployment stood at 13.8% while youth unemployment stood at 19.9% leading to continuous child labour of different forms in communities. It has been established that children in Zambia have been engaged in worst forms of child labour in both rural and urban areas, most prominently are the agriculture, mining sector (small scale mining) and vending. Zambia had a population of approximately 17,885,422 as of 2019 of which 8,334,618 were children below the age of 16 years⁵.

According to the 2018 Zambia Child Labour Survey Report (ZCLSR), the estimated number of children in child labour was 955,301 out of which, rural areas accounted for 640,052 representing 67% while urban areas accounted for 315,249 representing 33% out of 955,301, females were at 544,522 representing 57% while males were 401,779 representing 43%. Of the children engaged in child labour, 26,063 were engaged in hazardous work which is a subset of child labour. Table 1.1 shows the number distribution of children engaged in hazardous work by rural/urban, sex and industry in 2018.

⁵ Ministry of Community and Social Services National Social Policy of 2018 defines a child as any person below the age of 16 years.

Table 1.1: Number Distribution of Children Engaged in Hazardous Work by Rural/Urban, Sex and Industry for 2018

Industry	Total			Rural			Urban		
	Both Sexes	Male	Female	Both Sexes	Male	Female	Both Sexes	Male	Female
Total	26,063	21,142	4,921	19,100	15,302	3,798	6,963	5,840	1,123
Agriculture, forestry and fishing	15,179	11,786	3,393	15,179	11,786	3,393	-	-	-
Mining and quarrying	133	133	-	133	133	-	-	-	-
Manufacturing	2,045	1,836	209	-	-	-	2,045	1,836	209
Water supply; sewerage, waste management and remediation activities	232	-	232	232	-	232	-	-	-
Construction	2,808	2,808	-	1,113	1,113	-	1,695	1,695	-
Wholesale and retail trader; repair of motor vehicles and motorcycles	94	94	-	94	94	-	-	-	-
Transport and storage	518	232	287	232	232	-	287	-	287
Other services activities	2,543	2,268	275	1,003	1,003	-	1,540	1,265	275
Activities of households as employers	2,511	1,986	525	1,114	941	173	1,397	1,045	352

Source: Zambia Child Labour Survey Report (ZCLSR) 2018

Zambia in its quest to reduce child labour has developed laws and regulations related to child labour and ratified most key international conventions concerning child labour such as Worst Forms of Child Labour Convention 1999 - No.182 and the Minimum Age Convention 1973 -No.138 among others. Although Zambia has made considerable progress in the fight against child labour over the recent years, child labour still remains a significant challenge in the country with higher involvement of children in economic activities. While there have been many notable actions such as the implementation of the National Action Plan for the Elimination of the Worst Forms of Child Labour (NAP) in 2009, which was validated in January 2010 and officially launched in November 2011⁶, progress in addressing child labour is still slow as the prevalence of child labour in the country remains high in the rural and peri-urban areas due to high levels of poverty.

This situation has now been worsened with the advent of the Corona Virus Disease (COVID-19). It has been established that due to COVID-19, many small and medium scale enterprises have lost income, while large scale companies have adopted a strategy to reduce the labour force in their places of work. At household level, family bread winners have experienced reduced income or have lost employment as a consequence of measures put in place to contain and control the spread of the pandemic.⁷

⁶ Ministry of Labour and Social Security (MLSS), National Action Plan for the Elimination of the Worst Forms of Child Labour 2010-2015, January 2010

⁷ National Action Plan Against Child Labour II 2020-2025

The MLSS is charged with the responsibility of formulating and administering policies as well as regulating activities in the labour and employment sector to enhance the sectors' contribution to sustainable social and economic development for the benefit of the people of Zambia. The Ministry is also responsible for the implementation of programmes aimed at eliminating child labour. Addressing matters relating to child labour will also help Zambia to attain the Agenda 2030. Of particular importance in the Agenda 2030 is Sustainable Development Goal (SDG) No. 8: Decent Work and Economic Growth - Target 8.7 which aims to eliminate the worst forms of child labour, including recruitment and use of child soldiers, and by 2025 end child labour in all its forms. Zambia has attached importance to matters of child labour as evidenced in the Seventh National Development Plan (7NDP) in which Government recognizes labour as one of the most significant factors of production. In this regard, the Government planned to strengthen the labour administrative system and promote the decent work agenda through accelerated implementation of labour reforms and create a comprehensive social security system. In addition, through the Eighth National Development Plan (8NDP) Government seeks to strengthen enforcement of labour laws to enhance compliance and decent work.⁸

1.3. Motivation

Child labour affects the citizens as it can be detrimental to economic development. Child Labour is a violation of fundamental human rights and has been shown to hinder children's development. According to the United Nations Children's Fund (UNICEF)⁹, "child labour can result in extreme bodily and mental harm, and in some instances death. It can also lead to slavery and sexual or economic exploitation. Child labour cuts off children from schooling and health care, restricting their fundamental rights and threatening their future".

During the 2021 World Day against child labour on 12th June, 2021, commemorated under the theme "Act now: Stop Child Labour", the MLSS Permanent Secretary mentioned that there was need to find solutions to end child labour especially at a time when the whole world was grappling with the effects of the COVID-19 pandemic which ultimately is likely to make children more vulnerable and prone to being engaged in different forms of child labour for survival.¹⁰ In addition, on 13th June, 2021, the Eastern Province Labour Officer stated that the negative effects of COVID-19 on the economy and livelihoods of individual households were likely to increase the vulnerability of children to child labour.

⁸ Eighth National Development Plan 2022-2026

⁹ <https://www.unicef.org/protection/child-labour>

¹⁰ <https://zambianeye.com/zambia-joins-universe-mark-world-day-against-child-labour/>

To fight the scourge, the Labour Officer stated that the MLSS developed a mechanism to collect child labour data in order to strengthen the information base on the vice and enhance service delivery on labour matters. At the same event, the Chipata District Administrative Officer (DAO) said poverty was the major factor perpetuating child labour and assured that government would continue strengthening child justice to guarantee child protection.¹¹

Interest has also been shown by Parliament such that on 19th November 2020, during the commemoration of the World Children's Day, the first Deputy Speaker of the National Assembly of Zambia mentioned that children should be given a platform and the right tools in the development process. The Deputy Speaker further stated that the commemoration of the World Children's Day was important in the wake of the 2030 Global Agenda and SDGs which seek to leave no one behind, including children. The Deputy Speaker reiterated that children should have adequate access to quality education, skills training and empowerment which is in line with the recently launched Generation Unlimited Partnership, a global partnership that aims to ensure that every young person is in education, learning, training or employment by 2030.¹²

Meanwhile, Chairperson of the Parliamentary Caucus on Children (PCC), said children form a significant demographic representation of the population of Zambia, standing at 8.4 million of the total population approximated at 17,885,422 and therefore, there is need to take their welfare as a matter of urgency. The Chairperson stated that the gathering was special as it depicted the participation of children in national affairs that seek, among others, to address challenges such as child, early and forced marriage, inadequate education and violence in schools, poverty and malnutrition, poor health, including HIV and AIDS, child labour, homelessness and child imprisonment.¹³

1.4. Expected Benefit of the Audit to Society

It is against this background that the OAG undertook an audit to assess effectiveness of measures put in place by the MLSS to reduce incidences of child labour in Zambia. The audit on child labour has the potential of adding value and promoting change in the way the Ministry implements measures to eliminate child labour in the country thus improving the welfare of children in the country.

¹¹ <https://www.lusakatimes.com/2021/06/13/children-call-for-comprehensive-child-labour-education-link/>

¹² Commemoration of World Children's Day on Monday, 19th November, 2018 at Parliament Buildings

¹³ <https://www.parliament.gov.zm/node/7796>

CHAPTER TWO: AUDIT OBJECTIVE AND AUDIT QUESTIONS

2.0. Introduction

This chapter highlights the main and specific audit objectives, scope and audit questions to be answered to achieve the audit objective.

2.1. Main Audit Objective

To assess the effectiveness of measures put in place by MLSS to reduce incidences of child labour in Zambia.

2.1.0 Specific objectives

The specific objectives relating to the audit are shown below:

- 2.1.1 To assess the policy and legal framework in place to reduce incidences of child labour;
- 2.1.2 To ascertain whether the MLSS effectively implements, enforces and manages programmes aimed at reducing child labour;
- 2.1.3 To ascertain whether coordination mechanisms in place with stakeholders are effective in reducing child labour.

2.2. Audit Questions

The audit will answer the following questions:

- 2.2.0 To what extent has the MLSS developed and reviewed policies and legislation that reduce incidences of child labour?
- 2.2.1 To what extent has the MLSS ensured the effective implementation, enforcement and management of programmes aimed at reducing child labour?
 - 2.2.1.1. Has the MLSS carried out enforcement activities to reduce incidences of child labour?
 - 2.2.1.2. Has the MLSS established national and district child labour committees for the prevention and mitigation of child labour in the districts?
 - 2.2.1.3. How has the MLSS ensured public awareness on the dangers of child labour?
 - 2.2.1.4. Has the MLSS developed a database to enable tracking of children withdrawn, rehabilitated and reintegrated from child labour?

2.2.1.5. To what extent has the MLSS conducted coordinated child labour inspections?

2.2.1.5.1. Has the MLSS conducted regular monitoring of programmes pertaining to the reduction of child labour?

2.2.1.5.2. How has the MLSS enhanced the capacity of labour inspectors to conduct child labour inspections?

2.2.2 To what extent has the MLSS ensured effective coordination with stakeholders to reduce child labour?

2.3. Audit Scope

The audit examined the programmes implemented by the MLSS to reduce child labour incidences in Zambia. The audit focused on legislative and policy framework, prevention and enforcement programmes and coordination mechanisms in place to reduce child labour.

The audit covered the period 2018 to 2022. Stakeholders from the Ministry of Community Development and Social Services (MCDSS), Ministry of Education (MoE) and the Ministry of Youth, Sport and Arts (MYSA) were engaged during the audit to obtain information on the extent of coordination with the MLSS to reduce child labour.

CHAPTER THREE: METHODOLOGY

3.0. Introduction

This chapter describes the methodology used during the audit. The methodology includes an explanation and justification of the audit design. It further explains the sample population, sampling techniques, data collection and analysis methods.

3.1. Audit Standards

The audit was conducted in accordance with International Standards for Supreme Audit Institutions (ISSAIs) and guidelines in the OAG Performance Audit Manual. The standards require that the audit is planned and executed in a manner which ensures that an audit of high quality is carried out and that sufficient evidence is obtained to support the findings. The audit used a Problem-Based Approach which examines, verifies and analyses the causes of particular problems or deviations from criteria. The audit also adopted a mixed method of analysis that was inclusive of quantitative and qualitative approaches.

3.2. Audit Sampling

The MLSS has provincial offices in all the ten (10) provinces and is present in fifty-four (54) out of 116 districts. The audit sampled twelve (12) out of fifty-four (54) districts namely: Mongu, Kaoma, Nkeyema, Chipata, Lundazi, Chipangali, Kitwe, Ndola, Sinazongwe, Gwembe, Choma and Pemba. Purposive sampling technique was used to select the districts to be visited. The selection criteria included a mix of districts that had established District Child Labour Committees (DCLCs) and were implementing projects aimed at reducing child labour as well as districts that had not established the DCLCs.

3.3. Data Collection Methods

The data collection methods used during the audit are as explained below.

3.3.1. Document Review

Documents were reviewed to obtain information on effectiveness of measures in place by MLSS to reduce child labour incidences. The documents reviewed included the; 7NDP, 8NDP, National Action Plan on Child Labour 2020-2025, MLSS Strategic Plan 2017-2021, Employment Code Act No. 3 of 2019 and other relevant pieces of legislation. **Appendix 1** shows the list of documents reviewed and purpose of review.

3.3.2. Interviews

Structured interviews were conducted with officials at MLSS. The purpose of the interviews was to obtain information on the effectiveness of measures in place to reduce child labour and to corroborate data obtained from document review.

Stakeholders¹⁴ were also interviewed to ascertain the extent of coordination with MLSS and to obtain information on the strategic alliances created both at national and international levels in ensuring a conducive environment for the elimination of child labour. **Appendix 2** shows the list of officials interviewed.

3.3.3. Site Visits

Site visits of child labour projects being implemented by Cooperating Partners in collaboration with MLSS were conducted. This was to verify existence of the projects and obtain information on the programmes undertaken to reduce child labour.

3.4. Data Analysis

Qualitative and quantitative data was analysed using Microsoft excel and content analysis. The results were interpreted using graphs and tables.

¹⁴ Ministry of Community Development and Social Services, Ministry of Education, Ministry of Youth, Sport and Arts and International Labour Organisation.

CHAPTER FOUR: DESCRIPTION OF THE AUDIT AREA

4.0. Introduction

The chapter describes the mandate, roles and responsibilities, funding arrangements and objectives of the MLSS. It also highlights the key stakeholders engaged in reducing incidences of child labour and the systems description.

4.1. Mandate

The MLSS draws its statutory mandate from the Government Gazette Notice No.1123 of 2021. The Ministry implements basic social protection services that seek to provide social assistance and promotional service and is responsible for the following portfolio functions:

- i. Employment Policy;
- ii. Social Security Policy;
- iii. Labour Policy;
- iv. Educational and Occupational Assessment;
- v. Occupational Safety and Health Services;
- vi. Industrial and Labour Relations; and
- vii. Monitoring productivity.

4.2. Organisation of the Ministry of Labour and Social Security

The MLSS is headed by a Minister who is assisted by the Permanent Secretary responsible for the operations of the Ministry. The Permanent Secretary is assisted by the Labour Commissioner in charge of the Labour Department and seven (7) Directors in charge of Occupational Safety and Health, Social Security, National Productivity Development, Human Resource and Administration, Finance, Planning and Research, Procurement and Internal Audit. The Ministry has presence in all the ten (10) provinces. Relevant to this audit is the Labour Department and Planning and Research Department.

4.2.1. Labour Department

The department is mandated to provide policy and legal framework on administration and management of labour. The functions of the Department are to administer and enforce labour laws and labour relations matters among others to reduce incidences of child labour.¹⁵ The Department comprises of four (4) units namely Labour Inspection, Industrial Relations, Employment and Legal Unit. The roles and responsibilities of the units are as shown below:

¹⁵ www.mlss.gov.zm

4.2.1.1. Inspections Unit

The unit is responsible for securing the enforcement of legal provisions relating to conditions of work such as:

- i. Protection of wages;
- ii. Workers welfare;
- iii. Enforcement of contracts for instance minimisation of casual or child labour; and
- iv. Collective agreements and basic occupational health and safety standards for workers in industrial and commercial workplaces.¹⁶

4.2.1.2. Industrial Relations Unit

The unit facilitates interaction between government, workers and employers on all work-related issues, involving Trade Unions and Employers' Associations or Federation. It also considers matters related to recognition agreements, collective bargaining and agreements, settlement of collective disputes, Tripartite Consultative Labour Council meetings and enforcement of the Industrial Labour Relations (CAP 269) Act of 1993.

4.2.1.3. Employment Unit

The unit is responsible for all employment-related programmes and activities such as management of public exchange services, employment permits screening, labour market information, Zambianisation¹⁷ programmes, welfare and development services so as to harmonise the employment patterns and labour market information in the country. The Employment Unit has a child labour designated focal point person responsible for ensuring that matters of child labour are addressed. The unit carries out inspections related to children working in establishments and also liaises with Cooperating Partners such the International Labour Organisation (ILO) and other social partners of which many are NGOs.

4.2.1.4. Legal Unit

The Legal unit is responsible for labour law reforms.

4.2.2. Planning and Research

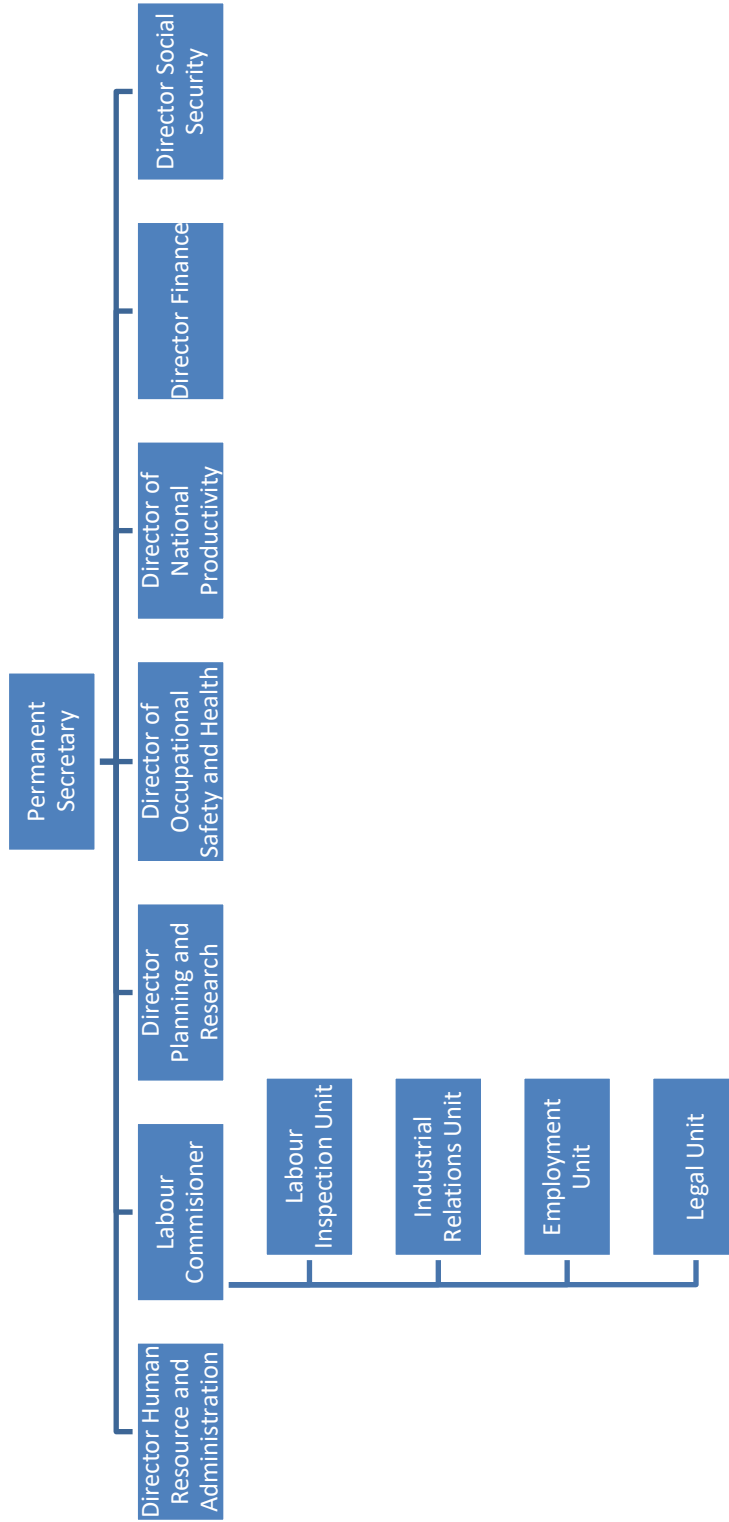
The department conducts research on matters related to child labour and informal sector employment on the key target areas.

¹⁶ www.mlss.gov.zm

¹⁷ Zambianisation is the process of adequately preparing Zambian nationals with requisite qualifications and skills to take over jobs occupied by foreign nationals.

The organisation structure for the MLSS is as shown in Figure 4.1 below while **Appendix 3** shows structure for the Labour Department.

Figure 4. 1: Ministry of Labour and Social Security Organisation Structure



Source: Ministry of Labour and Social Security

4.3. Budgets and Funding Arrangements

During the period under review, the MLSS had a total budget of K109,095,134 out of which K29,907,410 representing 27% of the total budget was allocated to the Labour Inspections Unit. Table 4.1 below shows the budgetary allocation per year from 2018 to 2021.

Table 4. 1: Funding Details Ministry of Labour

Year	Ministry's Budget (K)	Approved Labour Department	Expenditure towards Child Labour	%Approved labour Department
2021	33,450,981	13,142,263	80,000	39
2020	32,974,070	13,465,147	55,000	41
2019	36,761,343	2,350,000	100,000	6
2018	5,908,740	950,000	0	16
Total	109,095,134	29,907,410	235,000	27

Source: Estimates of Revenue and Expenditure 2018-2021¹⁸

As can be seen in Table 4.1 above, during the period under review, K235,000 was spent on child labour activities such as inspections, community sensitisation and coordination activities. However, expenditure details were not provided for child labour activities in 2018.

4.3.1. Key Stakeholders and their Roles

In executing its mandate, the MLSS collaborates with Ministries, Provinces and Agencies (MPAs) as well as Cooperating Partners to implement child labour programmes. The key stakeholders include:

4.3.2. Ministry of Community Development and Social Services

The MCDSS implements Basic Social Protection Services that seek to provide social assistance and promotional services (livelihood and empowerment) to the poor and vulnerable in society. The MCDSS collaborates with the MLSS through the National Coordination Committee for Children (NCCC) with a focus on child survival, development, protection and participation.

4.3.3. Ministry of Youth, Sport and Arts

The MYSA is responsible for the following:

- i. Coordination and monitoring of the implementation of the National Child Policy;
- ii. Coordination of child development programmes;
- iii. Domestication of the Convention on the Rights of the Child;

¹⁸ Information on child labour funding details not provided for 2018.

- iv. Promotion and protection of children's rights to survival development, protection and participation; and
- v. Combating streetism.

4.3.4. District Child Labour Committees

The DCLCs were established to oversee and implement various programmes outlined in the National Action Plan on Child Labour at district level. The composition of the DCLCs includes relevant Government line Ministries such as the MYSA, MoE and MCDSS. The committee also includes unions and employers' representatives, local leadership including chiefs and NGOs.

4.3.5. International Labour Organisation

The ILO is responsible for setting international standards on child labour as well as on other fundamental principles and rights at work. The ILO assists countries to develop, adopt and implement policies in a wide range of areas that have a direct impact on child labour such as national child labour elimination strategies and policies, national action plans for the elimination of the worst forms of child labour and sectorial policies and programmes.

4.4. Systems Description

This section describes in detail how relevant systems, processes and activities relating to child labour are supposed to function.

4.4.1. Formulation of laws and policies

The MLSS develops and reviews policies and legislation that prevent child labour. MLSS also ensures that formulated policies and legislation conforms to international conventions on child labour.

4.4.2. Labour Inspections

In order to monitor, manage and control child labour incidences in the country, Labour Inspectors conduct inspections in establishments to ensure that employers are complying with the labour laws and are not engaging children below the legal age in their work places. There are four types of labour inspections conducted namely:

- i. **Routine inspections:** are conducted on a regular basis to ensure that there is compliance with the labour laws;
- ii. **Follow up inspections:** are conducted usually after a routine inspection to ensure that all the recommendations made from the findings of the routine inspections have been adhered to;
- iii. **Special inspections:** are conducted when there are contentious issues at the establishment in relation to non-compliance of labour laws. These inspections are usually joint with other stakeholders; and

- iv. **Investigative inspections:** are conducted when there are issues pertaining to non-compliance from complaints. This is to ascertain whether there is compliance from both sides i.e. the employer and employee. These are undertaken to look into the checks and balances of the working environment and the industrial relations at the place of work.¹⁹

Once the inspections are conducted, the District Labour Officers (DLOs) prepare and submit quarterly reports to the MLSS headquarters. Labour inspection reports are submitted to the Assistant Labour Commissioner who then makes relevant observations and recommendations on the course of action to be taken should employers fail to comply with the labour laws. The final inspection report is then submitted to the Labour Commissioner.

4.4.3. Community Engagement

The communities are target areas for engagement in reduction of child labour cases. Labour inspectors will conduct community engagement through inspections, interviews and awareness programmes with the assistance of DCLCs and stakeholders to identify the challenges faced by families involved in child labour incidences.

4.4.4. Research and Data Capture

Planning and Research Department conducts research on matters related to child labour and informal sector employment on key target areas. The Planning and Research Department also designs data capturing tools used to populate a database which is then submitted to the Labour Commissioner for possible adoption. The data capturing tool provides statistics on the number of children engaged in child labour and the nature of work. The available data on child labour will be used as a basis to monitor, manage and control incidences of child labour in the country.

4.4.5. Engagement of Stakeholders

The MLSS will launch and coordinate child labour projects within the districts through the DCLCs. The DCLCs will monitor programmes related to child labour such as mobilisation of communities against child labour, identification and design projects for reducing incidences of child labour and mobilisation of resources. The DCLCs will assist in the monitoring and evaluation of child labour programmes in the catchment areas.

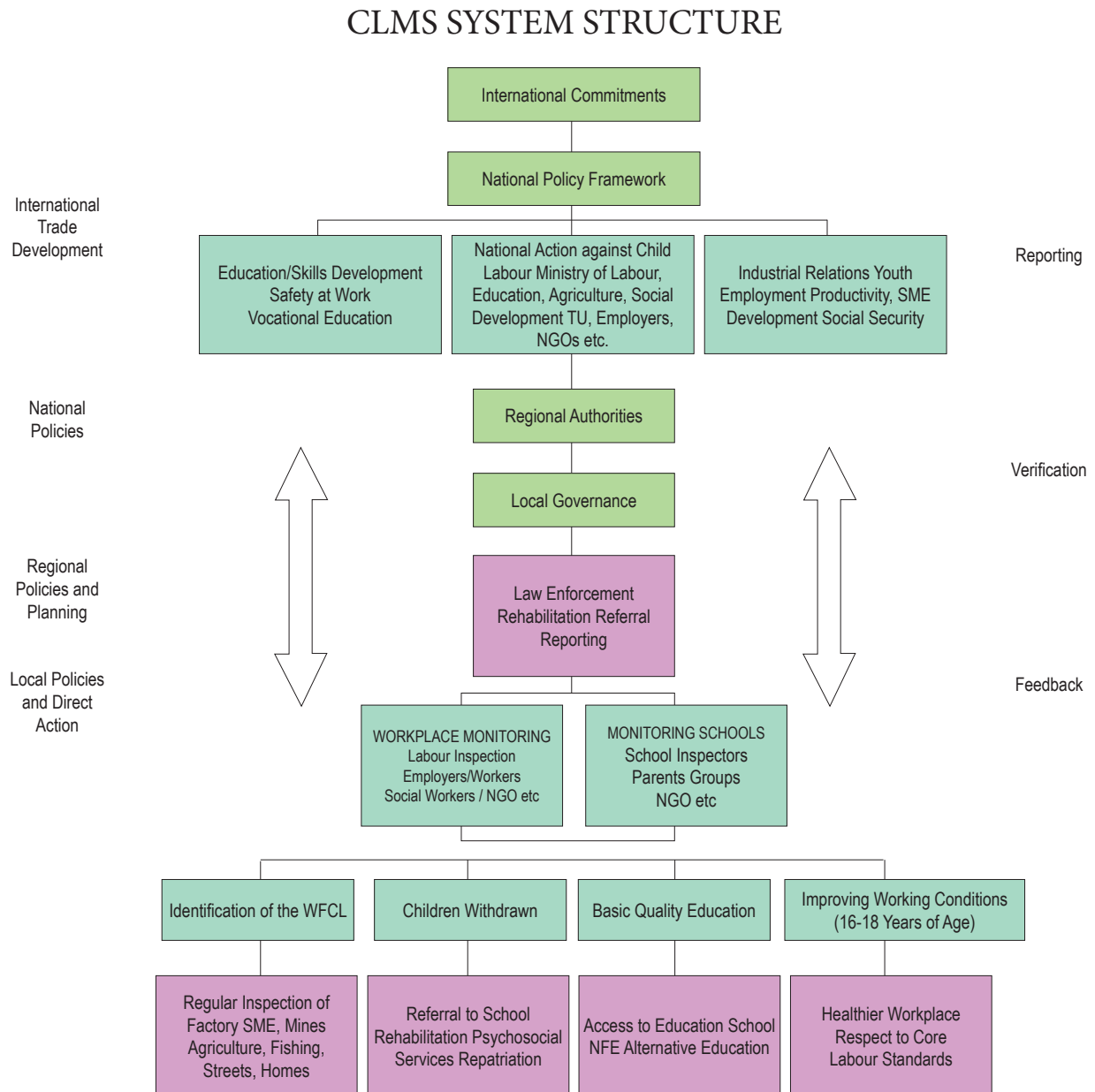
4.4.6. Withdraw and Reintegration of Children engaged in Child Labour

Once the labour inspections are conducted, Labour Inspectors will identify children engaged in child labour who will then be withdrawn from the establishments. The MLSS

¹⁹ www.mlss.gov.zm

will liaise with relevant stakeholders to rehabilitate and reintegrate the withdrawn children. See Figure 4.2: Child Labour Monitoring System Flow chart below.

Figure 4.2: Child Labour Monitoring System



Source: ILO Time-Bound Manual for Action Planning - Overview of Child Labour Monitoring System

CHAPTER FIVE: AUDIT CRITERIA

5.0. Introduction

The chapter introduces the audit criteria that were used to assess the performance of the MLSS with respect to its set targets and objectives.

5.1. Sources of Audit Criteria

The audit criteria for which the MLSS were assessed was drawn from the following sources:

- i. National Child Labour Policy
- ii. Ministry of Labour and Social Security Strategic Plan 2017-2021
- iii. International Labour Organisation – Handbook for District Child Labour Committees 2008
- iv. National Action Plan on Child Labour 2010 – 2015
- v. National Action Plan on Child Labour 2020 – 2025
- vi. Children’s Code Bill, 2022

5.2. Specific Criteria

5.2.1. Development and Review of Policies and Legislation to reduce Incidences of Child Labour

According to the National Action Plan on Child Labour 2010 – 2015, MLSS shall develop and review policies and legislation that prevent child labour. MLSS shall also strengthen and harmonise legislative and policy frameworks to guide action against child labour. Further, the National Child Labour Policy shall support legal reforms to ensure maximum protection of children from child labour.

5.2.2. Effective Implementation, Enforcement and Management of Programmes to reduce Child Labour

5.2.2.1. Prevention, Withdrawal, Rehabilitation and Reintegration of Children

One of the specific objectives of the National Action Plan on Child Labour 2010 – 2015 is the prevention and mitigation of child labour. Government shall prevent, withdraw, rehabilitate and reintegrate children who are engaged in child labour. The MLSS shall also establish DCLCs for the prevention and mitigation of child labour in the districts.

According to the Children’s Code Bill 2022, a person shall not subject a child to economic exploitation or any work that is hazardous or likely to interfere with the child’s education, physical or mental health, spiritual, moral, emotional or social development.

5.2.2.2. Establishment of National and District Child Labour Committees for the prevention and mitigation of child labour

According to the National Action Plan on Child Labour 2010 – 2015, the MLSS shall establish National and District Child Labour Committees to spearhead the implementation of the policy.

The National Action Plan on Child Labour 2010 – 2015 requires that the implementation framework for child labour programmes shall include DCLCs among others. The DCLCs shall:

- i. Mobilise communities against child labour;
- ii. Assist in policy review and development;
- iii. Provide local ownership of programmes against child labour;
- iv. Identify and design projects for the elimination of child labour;
- v. Mobilise resources; and
- vi. Assist in monitoring and evaluation of child labour programmes.

Further, the ILO Handbook for DCLCs also states that the DCLC shall facilitate and implement the process of eliminating child labour at district level.²⁰

5.2.2.3. Public Awareness on the Dangers of Child Labour

According to the National Action Plan on Child Labour 2010 – 2015, the MLSS shall:

- i. Promote awareness and understanding of child labour issues thereby providing community participation in child labour prevention, rehabilitation and reintegration;
- ii. Sensitise the public and communities about the dangers of child labour;
- iii. Conduct child awareness programmes targeting schools, communities, workers and employers;
- iv. Sensitise the public, communities and employers on situations where a child may be allowed to work; and
- v. Promote traditional and cultural practices that discourage child labour.

5.2.2.4. Development of a Database to enable Tracking of Children Withdrawn from Child Labour

According to the National Child Labour Policy of 2010 - 2015, the MLSS shall develop a tracking mechanism for children withdrawn from child labour. The MLSS shall also undertake regular surveys and other forms of participatory research to generate gender

²⁰ International Labour Organisation – Handbook for District Child Labour Committees 2008

disaggregated data and information on child labour. Further, they will collaborate and establish strong networks with research institutions and NGOs to share information, knowledge and materials on child labour. Databases will also be created at district and national levels on child labour.²¹

5.2.2.5. Coordinated Child Labour Inspections

According to the National Action Plan on Child Labour 2010 – 2015, the MLSS shall effectively enforce laws against child labour and intensify coordinated child labour inspections. According to the Strategic Plan, the Ministry shall increase adherence to the labour laws, show prevalence of child labour by sector and ensure 75% reduction of child labour cases.

5.2.2.5.1. Monitoring of Programmes to Reduce Child Labour

According to the National Action Plan on Child Labour 2010 – 2015, the MLSS in collaboration with key stakeholders will conduct regular monitoring of various programmes pertaining to the eradication of child labour. Further, appropriate indicators will be developed to guide the policy implementation based on research findings to assess and critically review the performance of the policy. The National Steering Committee will monitor and evaluate the implementation and impact of the policy to enhance accountability and effectiveness.²²

5.2.2.5.2. Capacity Enhancement of Labour Inspectors

According to the National Action Plan on Child Labour 2010 – 2015, the MLSS shall enhance the capacity of labour inspectors to conduct labour inspections.

5.2.3. Coordination with Stakeholders.

Government shall coordinate with relevant stakeholders for effective withdrawal, rehabilitation and reintegration of children engaged in child labour. Coordination shall be achieved through the following measures:

- Developing strategic alliances with non-governmental organisations, inter-governmental organisations, the private sector and cooperating partners such as the International Labour Organisation/International Programme for the Elimination of Child Labour in order to access resources needed to eliminate child labour; and
- Encouraging non-governmental organisations and community-based organisations to design and implement more programmes that support the elimination of child labour.²³

²¹ *ibid*

²² National Child Labour Policy of 2018

²³ National Child Labour Policy 2018

CHAPTER SIX: FINDINGS

6.0. Introduction

This chapter highlights the findings generated by the audit through comparing sufficient and appropriate evidence to criteria, verifying the problem(s) and analysing causes to the problems based on audit criteria.

6.1. Development and Review of Policies and Legislation to reduce incidences of Child Labour

According to the National Action Plan on Child Labour 2010 – 2015, MLSS shall develop and review policies and legislation that prevent child labour. MLSS shall also strengthen and harmonise legislative and policy frameworks to guide action against child labour. Further, the National Child Labour Policy shall support legal reforms to ensure maximum protection of children from child labour.

The audit revealed that the MLSS had developed policies and legislation to reduce child labour. The MLSS developed the Employment Code Act No.3 of 2019 and the National Child Labour Policy to ensure maximum protection of children from child labour. The MLSS had also developed the National Action Plan (NAP) on the elimination of the worst forms of child labour for the period 2010 to 2015. This meant that the MLSS operated with an expired Action Plan for the period 2016-2020. Interviews revealed that the MLSS had commenced a review of the NAP for the period 2020 to 2025 which was finalised in December 2020 and launched on 12th June 2021.

The NAP guides the child labour policy which was developed to support legal reforms to ensure maximum protection of children from child labour. Without an updated NAP from 2016 to 2020, the MLSS did not take into consideration emerging or current developments during the period under review.

6.1.1. Prevention, Withdraw, Rehabilitation and Reintegration of Children Engaged in Child Labour

One of the specific objectives of the NAP on Child Labour 2010 – 2015 is the prevention and mitigation of child labour. MLSS shall prevent, withdraw, rehabilitate and reintegrate children who are engaged in child labour. The MLSS shall also establish DCLCs for the prevention and mitigation of child labour in the districts.

During the period under review, the MLSS conducted activities to prevent and mitigate child labour. A review of documents revealed that in 2018, thirty-eight (38) inspections were conducted which resulted in the withdrawal of 116 children from child labour. In 2019, the MLSS conducted 160 inspections out of the planned 500 in which 120 children aged 8-17 years were identified and withdrawn from child labour. From the children withdrawn, sixty (60) were re-integrated into schools and placed on social welfare assistance to specifically support them with school requirements.

In 2020, the MLSS conducted 178 inspections from the planned 500 inspections. It was reported that 160 children were withdrawn from the planned total of 120 children. In 2021, the MLSS planned to conduct 500 inspections out of which 153 were conducted. Table 6.1 below shows the planned number of inspections against actual implemented.

Table 6.1: Planned vs Actual Child Labour Inspections

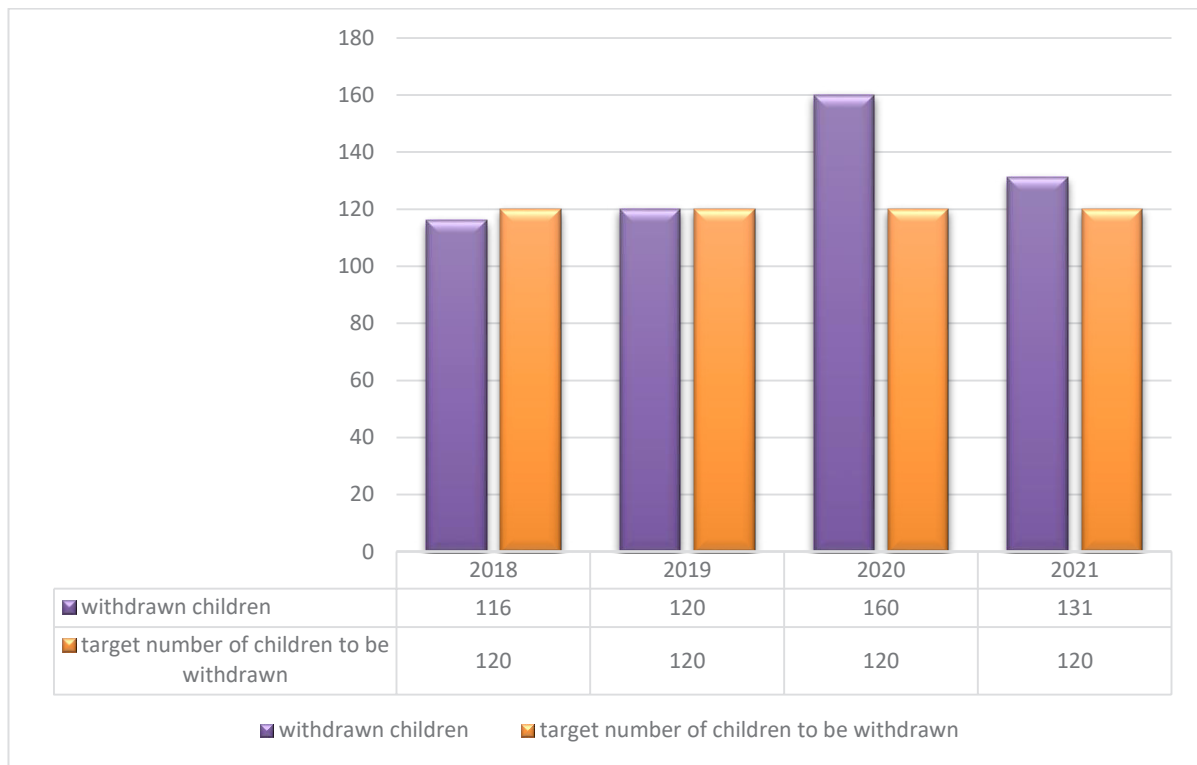
Year	Planned number of Inspections	Actual Number of Inspections	% Inspections
2018	Not Provided	38	-
2019	500	160	32
2020	500	178	35.6
2021	500	153	30.6

Source: MLSS Annual Reports 2018 - 2021

During the inspections, the MLSS withdrew 138 children from child labour. The analysis of statistics obtained from the MLSS Annual reports for the period under review showed that the 75% reduction of child labour incidences had not been achieved as there was an increase in the number of cases reported from 116 in 2018 to 138 in 2021 representing 19% increase²⁴. Figure 6.1 below shows the number of children withdrawn from child labour.

²⁴ 2022 data not provided by the Ministry.

Figure 6.1: Number of Children Withdrawn from Child Labour 2018-2021



Source: MLSS Annual Report 2020

The MLSS was unable to meet the target number of inspections aimed at withdrawing and rehabilitating children engaged in child labour due to insufficient financial and human resources to enforce child labour laws. A review of the 2020 Annual Report revealed that there was inadequate infrastructure in terms of availability of office space in some districts. This resulted in the MLSS being unable to deploy Labour Inspectors in all the 116 districts to undertake child labour activities as MLSS had presence only in fifty-four (54) districts. As a result of inadequate Labour Inspectors, a smaller number of enforcement activities were undertaken by the MLSS, which may result in non-compliance to child labour laws.

In the response dated 27th January 2023, the Ministry mentioned that they were unable to deploy Labour Officers to all the districts as they did not have establishments in all districts and only had a presence in fifty-four (54) out of the 116 districts. The Ministry could not operate to full capacity because some of the positions were frozen and could not be operationalised due to non-issuance of Treasury Authority. In addition, the Ministry was unable to meet the target number of child labour inspections due to inadequate funding on child labour activities.

However, the Ministry was granted Treasury Authority to reactivate eleven (11) frozen positions and create fourteen (14) positions as shown in table 6.2 below.

Table 6.2: List of Positions Reactivated and Created

Ministry of Labour and Social Security	
Positions Reactivated	Positions Created
<ul style="list-style-type: none"> • Senior Inspector of Factories – OSHS • Inspector of Factories – OSHS • Senior Productivity and Quality Improvement Officer – National Productivity Development Department (NPDD) • Productivity and Quality Improvement Officer – NPDD • Social Security Officer – NPDD • Principal Labour Officer – Labour Department • Senior Labour Officer – Central Province • Labour Officer – Central Province • Labour Inspectors (2) – Eastern Province • Senior Inspector of Factories – Copperbelt Province 	<ul style="list-style-type: none"> • Principal Monitoring and Evaluation Officer – Planning Department • Senior Monitoring and Evaluation Officer – Planning Department • Principal Labour Officer (9) – Labour Department • Assistant Director – Social Security • Assistant Labour Commissioner – Southern Province • Assistant Labour Commissioner – Northern Province

Source: Ministry of Labour and Social Security

Although the MLSS stated that most of appointments had since been facilitated by the Civil Service Commission, the number of staff was still inadequate. However, to ensure improvement in service delivery, the Ministry stated that they would continue engaging the Treasury for additional operationalisation of its structure.

6.2. Establishment of the National and District Child Labour Committees

According to the National Action Plan on Child Labour 2010 – 2015, the MLSS shall establish National and District Child Labour Committees to spearhead the implementation of the policy.

The audit revealed that the MLSS had established the National Child Labour Steering Committee (NCLSC), however, the committee was inactive and there were no minutes to show what activities or interventions were carried out to reduce child labour during the period under review, 2020 to 2022.

In response, the MLSS mentioned that the onset of the COVID 19 pandemic made it difficult for the NCLSC to meet after 2019. However, from inception, the NCLSC held two (2) meetings during the period under review. The first meeting was held on 13th February 2018 for the revision and finalisation of the NAP 2020-2025 while the second meeting was held on 12th June 2019, in commemoration of the World against Child

Labour. Stakeholders that attended the meeting included the MCDSS, ILO and MYSA among others.

The DCLC is a group of strategic stakeholders elected to represent the wider community in the district to make decisions or gather information about child labour. The DCLC comprises of stakeholders who have a role to play or can contribute towards the reduction of child labour in the district. However, the audit revealed that although the MLSS had an establishment of twenty-two (22) DCLCs out of the fifty-four (54) districts in which they had presence. From the twenty-two (22) DCLCs established only four (4) districts had active DCLCs namely Kaoma, Nkeyema, Chipata and Kasama districts. **Appendix 4** shows the districts with established DCLCs.

Further, site visitation in the fifteen (15) districts revealed that only three (3) districts namely Chipata, Kaoma and Nkeyema DCLCs were active and minutes of the meetings were availed to show activities of the DCLCs during the period under review. **Appendix 5** shows the status of the DCLCs in the fifteen (15) districts visited.

Interviews conducted with the Labour Commissioner, Provincial Officers and DLOs revealed that the cause for inactive DCLCs in the affected districts was due to inadequate resources to mobilise the relevant stakeholders which included other line Ministries and NGOs. It was also revealed that there was inadequate staffing at the MLSS as sixty-two (62) districts did not have labour officers to spearhead the formation of the DCLCs due to non-operationalisation of the revised organisation structure which was approved in 2014. In addition, a review of the independent final evaluation by Japan Tobacco International (JTI) revealed that low funding to counterpart Ministry partners coupled with lack of transport for the DCLC to carry out their responsibilities affected the operations of the DCLC leading to limited inspections by DCLC members. It was reported that in most cases, members used their own resources to carry out DCLC activities.

In the absence of active DCLCs in some districts, programmes relating to child labour could not be implemented effectively such as mobilisation of communities against child labour as well as mobilisation of resources to assist in monitoring and evaluation in catchment areas. For instance, through the DCLCs, Kaoma and Nkeyema were able to establish forty-five (45) Community Child Labour Committees (CCLCs) while Kasenengwa and Chipangali districts in Eastern province established thirty-seven (37) CCLCs to mobilise communities and create awareness to community members.

In a response dated 27th January 2023, the MLSS stated that the DCLCs were inactive as they depended on the support from donors, such as ILO. Following the end of their support the DCLCs were unable to convene meetings. However, although support was limited, some DCLCs were able to achieve some of their intended objectives of withdrawing children from child labour.

6.2.1. Implementation of District Child Labour Committee Activities

According to the National Action Plan on Child Labour 2010 – 2015, the DCLCs shall mobilise communities against child labour. The DCLCs shall also identify and design projects for the reduction of child labour.

The audit revealed that the DCLCs had not identified and designed projects for the reduction of child labour in twelve (12) of the fifteen (15) districts visited. Further, the DCLCs did not undertake any mobilisation activities within the communities except for the World Day against Child Labour commemoration where the DCLCs were required to mobilise communities and identify children to be supported with school requirements such as school uniforms, books and mathematical sets.

Further, a review of the monitoring reports showed that the DCLCs did not withdraw any children from child labour in communities. The non-withdrawal of children was highlighted as a problem in the monitoring reports prepared by the Provincial Labour Officers. This meant that children in the respective districts continued to be engaged in incidences of child labour.

The failure to mobilise and identify communities was attributed to lack of incentives especially staffing and transport which greatly affected coordination and implementation of the DCLCs.

As a result, DCLCs did not achieve the intended objectives of ensuring that child labour incidences were reduced.

6.2.2. Awareness of the Public on the Dangers of Child Labour

According to the NAP on Child Labour 2010 – 2015, the MLSS shall:

- Promote awareness and understanding of child labour issues thereby providing community participation in child labour prevention, rehabilitation and reintegration;
- Sensitise the public, employers and communities about the dangers of child labour and on situations where a child may be allowed to work;
- Conduct child awareness programmes targeting schools, communities, workers and employers; and
- Promote traditional and cultural practices that discourage child labour.

Although the MLSS undertook awareness campaigns which included the World Day against Child Labour, radio and television programmes and creation of child labour clubs in schools, much needed to be done to increase awareness in the communities on child labour.

In addition, there was limited public awareness on the existing labour laws, more especially in the rural communities. At district level, the audit revealed that awareness programmes were not adequately conducted by the DCLCs as only three (3) out of the

fifteen (15) districts visited had conducted awareness programmes namely Kaoma, Nkeyema and Chipata districts. A review of reports from Kaoma revealed that most of the establishments were aware of the prevailing labour laws as the field station had continued to conduct awareness. However, it was noted that new establishments were opening up and as such the department embarked on continuous sensitisation to ensure that employers complied with the law. Kaoma and Nkeyema districts worked in collaboration with the JTI and Winrock International who provided transport, financial support and other logistics for awareness activities.

The twelve (12) districts did not conduct awareness activities due to lack of resources such as transport and staffing to conduct the activity. Table 6.3 below shows the awareness programmes conducted in Kaoma and Nkeyema during the period under review.

Table 6.3: Awareness Programmes Conducted on Child Labour

District	Awareness Programmes Conducted
Kaoma/Nkeyema	<ul style="list-style-type: none"> • In 2018, monitoring and sensitisation of the labour laws that regulate the labour market. • In 2019, coordinated the commemoration for World Day against Child Labour which was held on 12th June, 2019 under the theme, “Children Shouldn’t work in fields but work on dreams”. The communities sensitised were: <ul style="list-style-type: none"> ✓ Kaoma district - Mulalila community ✓ Nkeyema district - Kamung’omba, Mawilo, Chitwa and Kajejeje communities. • In 2020, the field station conducted sensitisation on the dangers of child labour and also the Provisions of Section 80 of the Employment Code Act No. 3 of 2019 of the laws of Zambia. • In 2021, sensitisation of the tobacco farming community on the child labour legal framework and other labour laws relating to employment relationships.
Chipata	<ul style="list-style-type: none"> • In 2019, the district managed to raise awareness on adverse effects of child labour with the support of Jesus Cares Ministries. • 880 community beneficiaries were identified and supported by SPRIZ. The women supported were drawn from eleven (11)

	communities and the membership comprised guardians to children withdrawn from child labour. ²⁵
Chongwe	<ul style="list-style-type: none"> In 2020, the Ministry in conjunction with the Institute of Mentorship Foundation undertook a programme of creating Child Labour Clubs in five identified schools being Katoba, Twikatani, Ncute and Kyindu Primary Schools and Katoba Secondary School within Chongwe District which are the first of the expected 104 clubs in all schools in Chongwe.²⁶

Source: Ministry of Labour and Social Security Activity Reports 2018-2021

In response, the MLSS stated that to further strengthen awareness, the Ministry was working with Zambia National Information Services (ZANIS) to sensitise the nation on child labour, labour inspections, factories inspections and psychometric testing.²⁷ In this regard, a sixteen (16) series interview programme on ZANIS TV was scheduled to air from Monday 3rd February 2023 to 9th June 2023. The topic of discussion specific to child labour will be Child Labour, Labour Migration and Forced Labour to be aired on 28th April 2023.

6.3. National Database and Information

According to the National Child Labour Policy of 2010 - 2015, the MLSS shall develop a tracking mechanism for children withdrawn from child labour. The MLSS shall also undertake regular surveys and other forms of participatory research to generate gender disaggregated data and information on child labour. Further, they will collaborate and establish strong networks with research institutions and NGOs to share information, knowledge and materials on child labour. Databases will also be created at National and District levels on child labour.²⁸

According to ILO, labour statistics play an essential role in the efforts of member States to achieve “decent work for all” and for the ILO's support of these efforts. These statistics are needed for the development and evaluation of policies towards achieving the “decent work for all” goal and assessing progress. They are also an important tool for information and analysis, helping to increase understanding of common problems, explain actions and mobilise support.

Interviews with officials at the MLSS revealed that a national database and information system on child labour cases was not in place. This was despite the MLSS having established a data centre with assistance of ILO who provided computers and furniture. However, the data centre was not operational as the monitoring and reporting framework

²⁵ Eastern Province Annual Report 2019

²⁶ A field report on the formation of Child Labour Clubs in Chongwe District in collaboration with Institute of Mentorship Foundation MLSS/IK 30/03/2020

²⁷ Report of the Meeting held at ZANIS on 27th January 2023 between MLSS and ZANIS staff.

²⁸ International Labour Organisation – Handbook for District Child Labour Committees

was not in place to aid the collection of data in the districts for input into the system. Further, the districts faced challenges in terms of inadequate equipment such as computers to enable the input of data into the system.

The MLSS was also working in collaboration with other stakeholders such as the Child Protection Unit under the MCDSS and MoE on developing a comprehensive and robust Labour Market Information System (LMIS) with one of the key indicators being child labour. However, the system was not operationalised as of December 2022.

The audit also revealed that the MLSS working with Zambia Statistical Agency (ZamStats) conducted quarterly labour force surveys as a form of research on the labour force status for the period under review. The labour force survey showed that the labour force comprised 3,465,526 employees comprising 2,042,680 males representing 58.9% and 1,422,845 females representing 41.1%. However, the statistics reported by ZamStats did not include a component on child labour even though the survey questionnaire provided a section for children aged 5 to 17 years old.

In response, the MLSS stated that in future, the labour force survey report will include disaggregated child labour indicators for persons aged 5-17 years. However, this information was presented separately in a Child Labour Report. Table 6.4 below shows the detailed breakdown of the labour force.

Table 6.4: Number and Percentage Distribution of the Labour Force (15 years or older) by Province and Gender, Zambia 2020

Province	Total	Male		Female	
	Number	Number	Percent	Number	Percent
Total	3,465,526	2,042,680	58.9	1,422,845	41.1
Central	378,099	235,853	62.4	142,246	37.6
Copperbelt	724,653	427,727	59.0	296,926	41.0
Eastern	198,511	121,078	61.0	77,434	39.0
Luapula	172,206	94,856	55.1	77,350	44.9
Lusaka	1,178,495	681,417	57.8	497,078	42.2
Muchinga	127,598	80,359	63.0	47,239	37.0
Northern	112,554	74,196	65.9	38,358	34.1
North Western	151,164	86,719	57.4	64,444	42.6
Southern	308,445	176,769	57.3	131,676	42.7
Western	113,802	63,707	56.0	50,095	44.0

Source: Labour Force Survey 2020

As can be seen in Table 6.4 above, the total labour force reported in the 2020 survey showed that there were 3,465,526 employees which included children aged 15 years. The Constitution of Zambia defines a child as a person who has attained, or is below, the age of eighteen years.

However, according to the ILO report on the status of the child labour situation in Zambia for 2020, it was reported that gaps existed in the legal framework to adequately

protect children from the worst forms of child labour, including an undefined age range for compulsory education and lack of a list of activities considered to be light work, as required by Zambian law. For instance, the Education Act No.23 of 2011 requires that Government provides free education up to the ninth grade and stipulates that education is compulsory for children of "school-going age." The Act however, does not set a specific age or define "school-going age" which may allow children to leave school before they are legally able to work and thereby increase their vulnerability to the worst forms of child labour.

It was revealed that in Kaoma and Nkeyema, the ILO developed a database where all ILO implementing partners were required to input data on child labour. The implementing partners included Young Women's Christian Association (YWCA), Jesus Cares Ministries (JCM) and Achieving Reduction of Child Labour in Support of Education (ARISE) projects. However, the database was only available up to 2018 when the projects came to an end.

The lack of a database on tracking children withdrawn meant that the MLSS did not have up to date disaggregated data on the status of child labour in the country which would aid in decision making.

In a response dated 27th January 2023, the MLSS stated that data centre has been overtaken by the installation of the LMIS which is more decentralised as all districts with labour officers would use the system. The Ministry was also working with Smart Zambia Institute (SZI) to develop the LMIS. In operationalising the LMIS, the Ministry has since procured computers, Wi-Fi routers, tablets and printers which have been distributed to all districts with the presence of labour officers. In addition, officers have been trained on the use of the LMIS.

It was further mentioned that the Ministry has included a child labour component in the LMIS which will enable the establishment of the National Child Labour Database. This system will enable the Ministry to produce disaggregated data to show incidences of child labour. It will also include disaggregated child labour indicators for persons aged 5-17 years.

6.4. Development of a Tracking Mechanism on Child Labour

According to the National Action Plan on Child Labour 2010 – 2015, the MLSS shall develop a tracking mechanism for children withdrawn from child labour.

During the period under review, the MLSS did not have tracking mechanisms such as data capture and monitoring tool for child labour cases. Interviews with the provincial and district child labour officers in fifteen (15) districts visited highlighted that tracking of children withdrawn from child labour was a challenge as there was no system in place. It was further revealed that the MLSS relied on Cooperating Partners such as ARISE, JCM and YWCA to withdraw and rehabilitate children. For instance, Sinazongwe,

Chipata and Chipangali districts relied on Cooperating Partners to track children withdrawn from child labour. However, monitoring visits were not conducted by the MLSS to validate the statistics provided by Cooperating Partners. The audit also established that Cooperating Partners did not submit progress reports for validation despite a provision in the MoU's.

Interviews revealed that the MLSS did not have adequate human resource and transport to track children that were withdrawn from child labour. Without a tracking mechanism, the MLSS may provide inaccurate information on the status of children engaged in child labour and whether they have been successfully rehabilitated and reintegrated.

In response, the MLSS stated that there has been an ongoing collaboration with the MDCSS to identify and withdraw children found in child labour. Efforts have also been made to establish a tracking system in the LMIS which has since been activated and is being rolled out in all Labour offices country wide. In addition, a monitoring and evaluation unit has since been created and two (2) officers have been appointed to analyse data from the LMIS. Figure 6.2 shows officers receiving training on the LMIS in Chipata district.

Figure 6.2: Training of Labour Officers on the Labour Market Information System in Eastern Province



Source: Ministry of Labour and Social Security

6.5. Coordinated Child Labour Inspections

According to the National Action Plan on Child Labour 2010 – 2015, the MLSS shall intensify coordinated child labour inspections.

A review of the MLSS Annual Reports for the period under review showed that child labour inspections to monitor, manage and control incidences of child labour did not meet the targeted number of inspections. For instance, in 2019, the MLSS conducted a total of 160 child labour inspections out of the planned 500 inspections representing 32%. In 2020, 178 out of 500 child labour inspections representing 35.6% were undertaken while 153 out of 500 representing 30.6% were conducted in 2021.

A review of documents at the provincial and district offices also revealed that there were no plans to specifically conduct child labour inspections and that such inspections were conducted as part of the routine labour inspections in the formal sector. It was further established that the MLSS relied on the data collection tool used during formal sector labour inspections which had a component on child labour. However, it was observed that the tool did not have provisions to capture statistics such as gender and age of children and nature of child labour.

Interviews conducted with the thirteen (13) provincial and DLOs also revealed that the current reporting format for labour inspections did not disaggregate on how many child labour incidences occurred during the labour inspections. However, it is important to note that the high number of child labour incidences were more prominent in the informal sector in which children were involved in stone crushing and illegal mining activities in Kitwe district as well as tobacco farming in Kaoma, Nkeyema, Chipata and Chipangali districts.

Interviews conducted with project implementers namely JCM and Support for Poverty Reduction in Zambia (SPRIZ) in Chipata confirmed that child labour incidences were prominent in the informal sector. As a result, they were implementing projects to empower and train communities prone to child labour which resulted from high poverty and illiteracy levels of parents/guardians requiring their children to support the families. Interviews with the parents/guardians in Chipangali and Kapara village communities revealed that children were engaged in child labour incidences as their parent or guardians were unable to send them to school due to inadequate resources to provide school requisites such as uniforms, books and shoes.

A physical inspection of activities in Kitwe District showed that children were engaged in illegal mining activities, however, access to the illegal mining sites at the time of audit was a challenge. Interviews with the labour officers also confirmed that access to the site was a challenge due to perpetrators being hostile when approached for labour inspections.

It was established through interviews and a review of documents that the cause for not achieving the planned activities was due to inadequate and inconsistent funding during the period under review to carry out the activities. A review of the funding releases revealed that during the period under review, K235,000 was released for child labour activities.

At the provincial and district offices, it was revealed that there were no budget lines allocated for child labour and funding was inadequate and inconsistent with the districts not prioritising child labour activities such as sensitisation, child labour inspections and formation of DCLCs among others. This may result in the Ministry not being able to enforce labour laws which would prevent individuals from perpetrating child labour. **Appendix 6** shows the funding received by the districts and how it was utilised during the period under review.

In response, management acknowledged that the MLSS was unable to deploy labour officers to all the districts due to inadequate staffing. In addition, poor funding of the programme generally adversely affected many aspects of child labour implementation including coordination. However, it was mentioned that the 2023 budget had provided for child labour activities such as the world day against child labour, child labour awareness, monitoring and withdraw of children from child labour amounting to K362,780.

6.6. Capacity of Labour Inspectors to Conduct Labour Inspections

According to the National Action Plan on Child Labour 2010 – 2015, the Ministry shall enhance the capacity of labour inspectors to conduct labour inspections.

The audit revealed that in the period under review, the MLSS did not have adequate labour inspectors to coordinate and investigate child labour cases in all the districts visited. Interviews and a review of the staff establishment revealed that the MLSS had a total of eighteen (18) from a proposed eighty-six (86) Labour Inspectors in the new structure.

A review of the 2020 ILO report on child labour status in Zambia also revealed that the MLSS had insufficient number of labour inspectors compared to the average workforce of 6.9 million, representing a ratio of 1:383,333. This was in contrast to ILO's recommended ratio of 1 inspector for every 40,000 workers in less developed economies. This therefore meant that the MLSS would have to employ an additional 154 inspectors to meet ILO's recommended ratio. Table 6.5 below shows the number of labour inspectors against the proposed establishment in ten (10) provinces.

Table 6.5: Existing and Proposed Labour Inspectors per Province

No.	Province	Existing	Proposed
1	Lusaka	5	6
2	Muchinga	1	7
3	Central	4	9
4	Copperbelt	0	11
5	North-Western	1	6
6	Northern	0	3
7	Luapula	3	6
8	Western	1	13
9	Southern	2	19
10	Eastern	1	6
	TOTALS	18	86

Source: MLSS – Existing and Proposed Establishment

Interviews also revealed that the districts did not have a child labour unit specialised in managing matters of child labour due to the inadequate number of inspectors. This resulted in work overload on labour officers especially those operating from the field stations as they had to monitor child labour programmes and also carry out inspections of business premises to ensure compliance with labour laws. Table 6.6 shows the number of available labour officers against the establishment in the districts visited.

Table 6.6: Staff Establishment against Actual

Provincial/ District	Establishment	Available	Variance	Comment
Mongu	23	20	3	Only nine (9) out of the sixteen (16) districts had labour officers with seven (7) districts namely Lukulu, Kaoma, Mongu, Senanga, Sesheke, Shangombo and Kalabo not having a labour officer to attend to matters of child labour. The available staff included one (1) labour inspector based in Mongu district
Kaoma/Nkeyema	2	3	(1)	No Labour Inspector

Provincial/ District	Establishment	Available	Variance	Comment
Lundazi	0	1	(1)	The officer in Lundazi was supposed to operate from Chisefu district which had no labour officer to implement child labour activities.
Chipata	6	9	(3)	The three (3) officers were stationed in Chipata district.
Sinazongwe	0	1	(1)	The establishment neither provided for a Labour Officer nor a Labour Inspector. However, an Officer was deployed to the district administratively.
Choma	3	2	(1)	
Pemba/Gwembe	2	1	(1)	The available officer was also responsible for operations in Gwembe and Mazabuka districts.
Kitwe	0	5	(5)	Available officers were under Ndola district as there is no establishment under Kitwe district.
Ndola	20	6	(14)	
Vubwi	1	0	(1)	The Officer was operating from Chipata district for administrative convenience.

Source: Performance Audit Analysis 2022

6.7. Monitoring of Programmes and Projects on Child Labour

According to the National Action Plan on Child Labour 2010 – 2015, the MLSS in collaboration with key stakeholders will conduct regular monitoring of various programmes, projects and activities pertaining to the eradication of child labour.

Effective monitoring and evaluation is of paramount importance together with appropriate feedback mechanisms.²⁹ The audit revealed that there was low coverage of child labour eradication programmes by the MLSS resulting in some rural communities lagging behind in reducing child labour. During the period under review, the MLSS signed MOUs with Cooperating Partners to reduce child labour incidences in selected districts. It was further revealed that child labour projects were implemented in four (4) out of fifteen (15) districts and were implemented as indicated below:

- i. The EMPOWER Project: the goal of the project was to reduce the prevalence of child labour in targeted rural areas in Eastern province;
- ii. The FACT Project: the project was aimed at eliminating all forms of child labour particularly in tobacco farms;
- iii. The Decent Work in the Tobacco Sector (DWit) Project;
- iv. ARISE Project.

However, the audit revealed that the MLSS in collaboration with key stakeholders such as the DCLCs did not regularly monitor the above stated projects. In addition, interviews with officers at provincial and district offices revealed that the MLSS did not have monitoring tools for child labour programmes and projects which made it difficult for the MLSS to track children that were withdrawn from child labour incidences by Cooperating Partners. Furthermore, it was established that project monitoring was affected by lack of transport and funding for fuel resulting in the MLSS being unable to validate child labour statistics from all the implementing partners.

Furthermore, interviews with the DLOs revealed that staffing was also a challenge in Lundazi, Sinazongwe, Pemba, Gwembe and Mazabuka districts as there was one (1) officer to carry out all activities relating to labour such as enforcement, occupational health and dispute resolution. A review of the staff establishment revealed that some districts visited namely Sinazongwe, Lundazi and Chipata did not have positions for labour officers while the available officers were deployed for administrative convenience.

6.8. Coordination with Stakeholders in Reducing Child Labour

According to the National Action Plan on Child Labour 2010 – 2015, Government shall coordinate with relevant stakeholders for effective withdrawal, rehabilitation and reintegration of children engaged in child labour by developing strategic alliances with non-governmental organisations, inter-governmental organisations, and the private sector and cooperating partners.³⁰

²⁹ Interview with Ministry of Community Development and Social Services

³⁰ National Child Labour Policy 2018

During the period under review, the MLSS coordinated with non-governmental organisations, inter-governmental organisations, the private sector and cooperating partners to implement programmes related to child labour. The MLSS was also a member of the National Coordination Committee for Children (NCCC) Technical Working Groups (TWGs) on child protection and Participation which was chaired by MCDSS.

However, interviews with officials from the MCDSS revealed that there was inadequate coordination between the NCCC, a committee under the MCDSS as there was no representation from MLSS during the period under review. Similarly, the National Steering Committee (NSC) on Child Labour, a committee under MLSS³¹ did not meet regularly, with the last meeting held on 21st February 2018. In addition, there was also lack of coordination between the District Child Protection Committee under MYSA and the DCLCs under MLSS in that child labour statistics obtained by the respective Committees was not shared and consolidated due to the absence of a national database and information system.

It was further revealed that despite child labour matters requiring a multi-sectoral approach among government institutions, relevant committees worked in silos. Child labour statistics captured by individual Ministries were not shared and as a result the MLSS did not have aggregated data on child labour which affected decision making.

In a response dated 27th January 2023 the MLSS stated that they would continue to promote the operationalisation of the institutional arrangement as outlined in the National Policy and Action Plan on Child Labour and will hold regular steering committee meetings. The Ministry has since received nomination of members to sit on the National Steering Committee and the first meeting is scheduled to be held in the first quarter of 2023. Further, the LMIS has been implemented by MLSS which will facilitate the standardisation of statistics across the various stakeholder institutions dealing with the Child.

³¹ https://www.dol.gov/sites/dolgov/files/ILAB/child_labor_reports/tda2020/Zambia.pdf

CHAPTER SEVEN: CONCLUSIONS

The audit concludes that although the MLSS has put in place measures to reduce child labour, the measures in place have not been effective to reduce incidences of child labour in the Zambia. The main reason is that the MLSS continues to face challenges in the implementation, enforcement and management of child labour programmes.

The MLSS has developed policies and legal framework to reduce incidences of child labour which includes the National Action Plan on Child Labour and the National Child Labour Policy among others. However, during the period under review, the MLSS has operated with an expired Action Plan which may not take into consideration emerging or current developments in reducing incidences of child labour during the period under review. On a positive note, the MLSS has the Action Plan was updated and launched as of June 2023.

The MLSS has not effectively implemented, enforced and managed child labour programmes. The Ministry has not developed an effective tracking mechanism to combat child labour. Data on reported cases in the selected provinces and districts has not been systematically captured to show the national position on child labour to enable the Ministry make timely and informed decisions on child labour programmes. Without a tracking mechanism, the Ministry will not be able to effectively conduct monitoring and follow up children withdrawn and rehabilitated from child labour. Further, in the absence of a tracking and follow-up mechanism, children withdrawn may go back to child labour activities thereby affecting their growth and education. In addition, the Ministry may fail to direct resources to priority areas.

Awareness has been carried out to some extent. However, the districts have challenges in conducting awareness programmes as resources are not available for this activity. Further, the inactive DCLCs in some districts has affected the implementation of awareness programmes as the DCLCs play a critical role in mobilising communities for awareness programmes. Without awareness programmes, members of the communities will not be knowledgeable on child labour and what constitutes it resulting in children being exposed to incidences of child labour. Further, the DCLCs have not been operationalised in some districts resulting in the Ministry being unable to effectively coordinate the activities of the CCLC that play a critical role in mobilising communities in the fight against child labour as well as identifying and designing projects for the elimination of child labour.

Coordinated child labour inspections have not been carried out by the Ministry due to inadequate funding, inadequate staff and transport to conduct the exercise. Further, the districts have not planned for the child labour inspections which are instead incorporated in the labour inspections conducted in the formal sector. However, child labour

incidences are more prevalent in the informal sector which means that child cases may continue to remain undetected and unreported.

Various child labour programmes have been implemented in selected districts on child labour. However, monitoring of the projects has been done to a limited extent with the Ministry not having the capacity to validate the reports and statistics submitted by the various project implementers. There is no specific budget line for monitoring child labour programmes and availability of transport and staffing is also a challenge. Without monitoring programmes, the Ministry will be unable to reduce on the child labour incidences and provide policy guidance to the project implementers.

The MLSS has ensured coordination with stakeholders through the establishment of the NSC. However, activities relating to child labour have not been adequately addressed through this committee as they have not been meeting as required to deliberate on matters concerning the welfare of children. The National Child Labour Steering Committee on child labour is meant to enhance the coordination, however, the committee is inactive with the Ministry not providing documentation to show interventions carried out to curb child labour. Without regular meetings, coordination will continue to be ineffective.

CHAPTER EIGHT: RECOMMENDATIONS

The audit recommends that the MLSS should:

- i. Prioritise the available resources to ensure that the DCLCs are established and reactivated in the districts to spearhead the enforcement of child labour laws;
- ii. Operationalise the national database centre to capture all matters related to child labour. This will ensure that data will be aggregated at national level and resources directed accordingly;
- iii. Consider developing a stand-alone child labour data collection tool for purposes of collecting uniform data on child labour;
- iv. Ensure the Labour Officers' capacity is built through provision of training programmes to equip officers with current developments on child labour;
- v. Ensure guidelines are in place to provide for child labour inspections in the informal sector which is highly susceptible to child labour incidences;
- vi. Ensure that activities centred around child labour are planned and implemented using a multi sectoral approach with relevant stakeholders to ensure that efforts to combat child labour are not duplicated;
- vii. Ensure regular monitoring of project implementers to validate data and statistics obtained from the implementing partners. This will ensure availability of up to date and accurate data on child labour; and
- viii. Leverage on their coordination with relevant stakeholders to enhance awareness of communities on child labour in the in the country.

APPENDICES

Appendix 1: List of Documents Reviewed and Purpose of Review

No.	Name of Document	Purpose of review
1.	7NDP 2017-2021 and 8NDP 2022-2026	To assess the strategic objectives and developmental outcomes in reducing incidences of child labour.
2.	National Action Plan on Child Labour 2010-2015 and 2020-2025.	To review the activities intended to reduce incidences of child labour.
3.	Ministry of Labour and Social Security Strategic Plan 2017-2021	To understand the strategic objectives and long-term goals of the Ministry in reducing child labour and providing a conducive labour environment.
4.	Employment Code Act No. 3 of 2019	To obtain information relating to the rules and regulations for employment of young persons and minors.
5.	Worst Forms of Child Labour Convention, 1999	To understand the worst forms of child labour and whether the country has domesticated the labour convention of 1999.
6.	Child Labour and Forced Labour Reports – Bureau of International Labour Affairs	To obtain information on the global statistics as well as current developments relating to child labour.
7.	Children’s Code Bill, 2022	To obtain information on the reforms and laws relating to children in Zambia.
8.	ILO press releases 2018 – 2021	To obtain information on the status and prevalence of child labour in the country. The press releases also provided information on programmes being implemented on child labour.
9.	Annual reports 2018 to 2021	To ascertain programmes implemented by the Ministry in reducing child labour.

Source: Performance Audit Analysis 2022

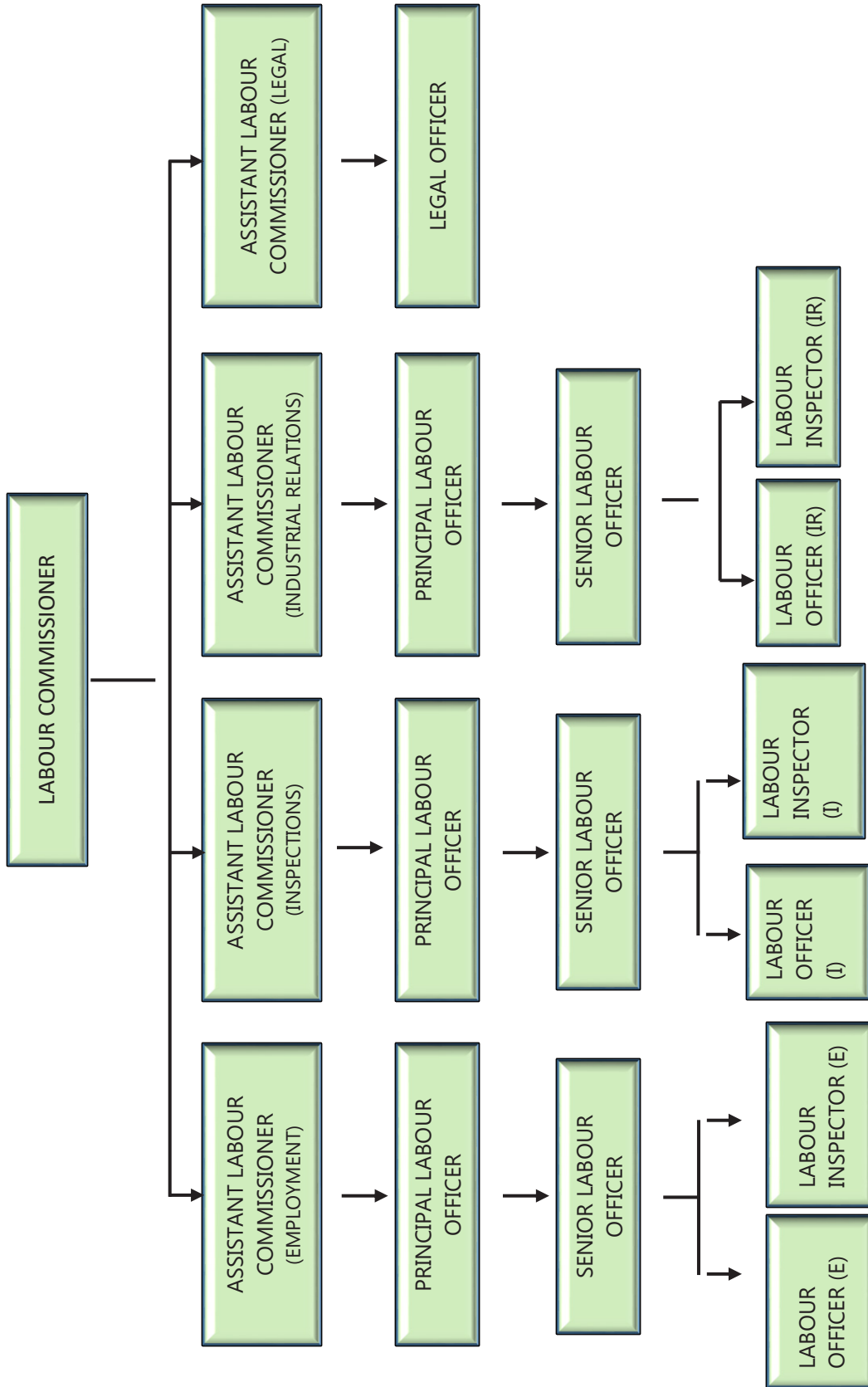
Appendix 2: List of Places Visited and Interviewees

Province	Place	Personnel Interviewed
Lusaka	Ministry of Labour and Social Security	<ul style="list-style-type: none"> • Permanent Secretary • Labour Commissioner • Assistant Labour Commissioner • Labour Officer
	Ministry of Community Development and Social Services	<ul style="list-style-type: none"> • Director – Child Development Department • Director – Social Welfare
	Ministry of Education	<ul style="list-style-type: none"> • Permanent Secretary
	Ministry of Youth, Sport and Art	<ul style="list-style-type: none"> • Director – Child Development (MCDSS)
	International Labour Organisation	<ul style="list-style-type: none"> • Director – ILO
Copperbelt	Ministry of Labour and Social Security	
	Ndola	<ul style="list-style-type: none"> • Provincial Labour Officer
	Kitwe	<ul style="list-style-type: none"> • District Labour Officer • Senior Labour Officer
	<ul style="list-style-type: none"> • Ministry of Community Development and Social Services 	<ul style="list-style-type: none"> • District Social Welfare Officer
	Kitwe	<ul style="list-style-type: none"> • Vice Chairperson – District Child Labour Committee
Western	Ministry of Labour and Social Security	
	Kaoma/Nkeyema	<ul style="list-style-type: none"> • District Labour Officer • Assistant Labour Officer (2)
	Mongu	<ul style="list-style-type: none"> • Provincial Labour Officer
Eastern	Ministry of Labour and Social Security	
	Chipata	<ul style="list-style-type: none"> • Provincial Labour Officer
	Lundazi	<ul style="list-style-type: none"> • Acting District Labour Officer
	Jesus Cares Ministries	<ul style="list-style-type: none"> • Project Officer

Province	Place	Personnel Interviewed
		<ul style="list-style-type: none"> • Business and Livelihood Officer
	Support for Poverty Reduction in Zambia	<ul style="list-style-type: none"> • Project Officer
Southern	Ministry of Labour and Social Security	
	Choma	<ul style="list-style-type: none"> • District Labour Officer
	Pemba	<ul style="list-style-type: none"> • Labour Officer
	Sinazongwe	<ul style="list-style-type: none"> • Labour Officer
	Ministry of Community Development and Social Services	
	Choma	<ul style="list-style-type: none"> • District Child Development Officer • District Social Welfare Officer

Source: Performance Audit Analysis 2022

Appendix 3: Organisation Structure (Labour Department)



Source: Ministry of Labour and Social Security

Appendix 4 District Child Labour Committees Established

No.	Province	Districts
1.	Lusaka	<ul style="list-style-type: none"> • Lusaka • Kafue
2.	Central	<ul style="list-style-type: none"> • Kabwe • Kapiri Mposhi • Mkushi
3.	Muchinga	<ul style="list-style-type: none"> • Mpika • Nakonde
4.	Luapula	<ul style="list-style-type: none"> • Mansa • Kawambwa • Nchelenge
5.	Northwestern	<ul style="list-style-type: none"> • Solwezi
6.	Copperbelt	<ul style="list-style-type: none"> • Ndola • Kitwe • Mufulira
7.	Southern	<ul style="list-style-type: none"> • Livingstone • Choma • Mazabuka
8.	Western	<ul style="list-style-type: none"> • Kaoma • Mongu
9.	Eastern	<ul style="list-style-type: none"> • Lundazi • Chipata
10.	Northern	<ul style="list-style-type: none"> • Kasama

Source: Performance Audit Analysis 2022

Appendix 5: Establishment of DCLCs and Status

District	DCLC Established	Status	Comment
Ndola	No.	Inactive	The provincial office had not engaged the districts to activate the DCLC since 2015.
Kitwe	No	Inactive	The DCLC was not functional in Kitwe and there were no minutes provided to show evidence of the last meeting held.
Choma	No	Inactive	The DCLC was not active, however, a meeting was held with the District Commissioner in January 2022 to facilitate for the formation of the child labour committees. The provincial office was awaiting feedback from the MLSS on matters of resources and logistics.
Sinazongwe	No	Not established	The DCLC was not functional and there were no minutes provided to show evidence of the last meeting held.
Pemba/Gwembe	No	Not established	The DCLC was not functional and there were no minutes provided to show evidence of the last meeting held.
Chipata	Yes	Active	The DCLC was functional. Further, the Community Child labour Committees were operational to aid with mobilisation of community members.

District	DCLC Established	Status	Comment
Lundazi	No	Inactive	The DCLC was not functional and there were no minutes provided to show evidence of the last meeting held.
Chipangali	No	Not established	The DCLC was not functional and there were no minutes provided to show evidence of the last meeting held.
Mongu	No	Inactive	The DCLC was not functional and there were no minutes provided to show evidence of the last meeting held.
Kaoma	Yes	Active	The DCLC was functional. Further, the Community Child labour Committees were operational to aid with mobilisation of community members. The DCLC was established in 2013 with a total membership of forty-five (45), drawn from different government department, NGOs and Faith Based Organisations.
Nkeyema	Yes	Active	The DCLC was functional. Further, the Community Child labour Committees were operational to aid with mobilisation of community members.
Lusaka	No	Inactive	The DCLC was functional. Further, the Community Child labour Committees were operational to aid with mobilisation of community members.

Source: Performance Audit Analysis 2022

Appendix 6: Funding Received by Districts for Child Labour Activities

No.	DISTRICT	2018	2019	2020	2021	TOTAL
1	Pemba	2,000.00	3,000.00	-	2,000.00	7,000.00
2	Sinazongwe	-	-	-	-	-
3	Kitwe	-	-	-	-	-
4	Ndola	-	-	-	97,000.00	97,000.00 ³²
5	Mongu	5,000.00	5,000.00	-	-	10,000.00
6	Kalomo/Nkeyema	-	4,140.00	-	-	4,140.00
7	Chipata	-	-	-	-	-
8	Choma	2,000.00	2,000.00	2,000.00	2,000.00	8,000.00

Source: Performance Audit Analysis 2022

³² The K97,000 was shared amongst eight (8) districts in Copperbelt Province

