

HEMA Child labour policy

Introduction

This policy is intended to ensure that all suppliers involved in the supply or manufacturing of goods for HEMA are aware of, and have in place, a clear protocol on roles and responsibilities in preventing, mitigating and remediating child labour (**child labour protocol**).

Definitions

The definitions used in this policy are sourced from internationally recognized standards to ensure uniformity and effectiveness in our internal practices.

a child means every human being below the age of 18 years unless, under the law applicable to the child, majority is attained earlier. ([Convention of the Rights of the Child](#))

child labour is work that deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development. ([Convention of the Rights of the Child](#))

minimum age for admission to employment or work is 15 years (13 years for light work), 14 years in developing countries (12 years for light work). The minimum age for hazardous work is 18 (16 under certain strict conditions). ([ILO Convention 138](#))

worst forms of child labour are forms of work which, by their nature or the circumstances in which they are carried out, are likely to harm the health, safety or morals of children and therefore are prohibited for all children. ([ILO Convention 182](#))

situations in which children between 15 – 18 years are employed in non-hazardous work, but are coerced in such work through the use of violence or intimidation, or by more subtle means such as accumulated debt, retention of identity papers or threats of denunciation to immigration authorities, are also considered to be child labour. ([ILO Convention 29](#))

Pre-conditions

In conformity with [HEMA Supplier Code of Conduct](#) and the below, each production location must have a protocol regarding child labour based on HEMA's requirements.

Each production location is required to actively share these requirements with each of their suppliers and subcontractors, cascading it through the supply chain.

HEMA will support suppliers and production locations in implementing the protocol and in remediating and mitigating child labour (see chapter Division of Responsibilities).

Young Workers

Under the right conditions, employment of those between 15 and under 18 years of age is allowed (and encouraged). Young workers are essential to building a strong workforce,

and it will enable adolescents who lack access to formal education. However, this is only allowed under strict circumstances.

Child-friendly age verification protocol

Age verification is a central part of a clear employment policy. However, this should always be done with the best interest of the child in mind. [ILO Supplier Guidance on Preventing, Identifying and Addressing Child Labour, Chapter 11 \(p13\)](#)

Scenario's

HEMA has worked out several general scenarios to guide suppliers/production locations in case of (alleged or suspected) child labour. Note: each instance has to be assessed and treated individually, as each situation will differ.

Scenario 1 Child labour suspicion

Any instance of child labour will start with a suspicion that a worker or an applicant is under the minimum working age. In this case, the following guidelines should be followed by or at the supplier and production location:

1.1 At the gate (during the application period)

When an applicant turns out to be a child, it is essential that the supplier/production location does not hire the applicant but also that there is a contingency plan. The supplier and production location will ensure that:

- The child's/applicant's age is verified via a robust age verification system or protocol;
- A local organisation specialised in child labour prevention is contacted;
- The caretaker(s) or parent(s) are contacted and informed;
- Safe transportation home is arranged and paid for by the supplier/production location or local organisation;
- The child's main motivation for application is determined; if (s)he is driven by the wish or need to economically support a household, the supplier/production location can consider hiring a family member of the applicant to mitigate the loss of potential income.

1.2 At the work floor

If an (alleged) child is found on the work floor of the production location, direct action from supervisors is required. The supplier and production location will ensure that:

- The (alleged) child is taken to a safe location at the production location (designated area, for instance, a childcare room) and explained the situation.
- The age of the alleged child is verified via a robust and child-friendly age verification system or protocol.
- The caretaker(s) or parent(s) are contacted and informed.
- Safe transportation home is arranged and paid for by the supplier/production location.

The supplier will file a report to HEMA within 24hrs of discovery, and HEMA will within 48hrs assess the situation and propose a support plan.

If the worker is under the minimum working age, scenario 2.1 will apply. In case of a worker working under dangerous or hazardous conditions, scenario 2.2 will be put into action.

Scenario 2 Child labour confirmed case

2.1 A child under the minimum working age is identified

If a child under the legal working age is identified at the production location, the supplier and production location will jointly ensure that the guidance set out in 1.2 is followed, and in addition, ensure that:

- A health check and any additional health care that might be needed is provided.
- An assessment is performed whether the minor could remain to be employed at the production location.
- All available documentation on the child's work history is collected and reviewed. This includes but is not limited to photos, video recordings, interviews, work schedules and contracts.
- Employment is terminated, and all outstanding payments are fully fulfilled.
- A proposal for remediation is drafted within 72 hrs. This can include but is not limited to enrolment in suitable education for the child, follow-up protocol (to ensure continuous enrolment), an offer to rehire the child when (s)he reaches the minimum working age and making some sort of payments (in money or in kind) to the child (without the child having to perform any work) until (s)he reaches the minimum working age.
- A notice is sent to HEMA within 24 hrs after the identification of the child, while the proposal for remediation is shared with HEMA within 72 hrs.

2.2 A young worker is identified as conducting labour that is dangerous or harmful (defined as child labour)

If a young worker is identified conducting labour that is dangerous or harmful, the production location will ensure that:

- The young worker is provided with a health check and care.
- The young worker is reallocated and allowed to resume working at the production location.
- The worker will fall under the young worker protocol till (s)he becomes 18 years of age.

In any of the above cases, the supplier and/or the production location will review their hiring policy, their child labour protocol (including young worker protocol), in collaboration with a specialised NGO, with the support of HEMA if needed. Such a review may impact policy adjustments to prevent future cases.

Division of responsibilities

Suppliers and production locations

Suppliers and production locations are required to implement their child labour protocol and ensure staff is familiar with it through training and regular refreshments.

Suppliers must inform HEMA of any cases or suspected cases found on the production location within 24 hours.

HEMA

HEMA will support suppliers and production locations in the implementation and upholding of their child labour protocol by **providing documentation and explanation** upon request.

HEMA will support suppliers and production locations in cascading the protocols and requirements for the prevention of child labour to their suppliers/subcontractors, by **providing HEMA policies** (HEMA Supplier Code of Conduct and HEMA child labour policy) in **selected local languages**, upon request.

HEMA will support suppliers and production locations in case of identified child labour via our [**Emergency Response Plan**](#). Appropriate form of remedy will be decided on a case-by-case basis.