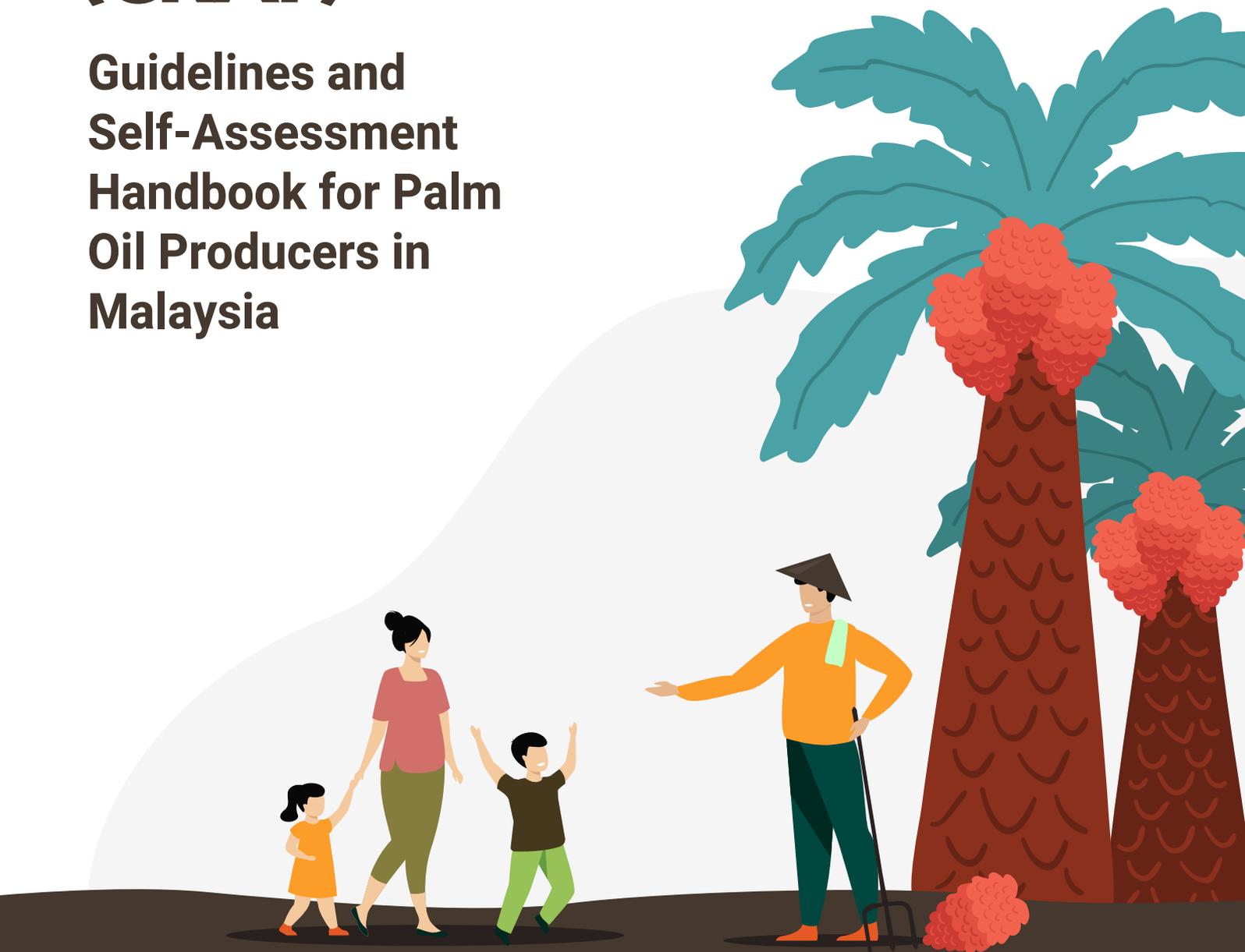


# **CHILD RISK ASSESSMENT FRAMEWORK (CRAF)**

**Guidelines and  
Self-Assessment  
Handbook for Palm  
Oil Producers in  
Malaysia**





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## **Disclaimer**

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## About Us

Earthworm Foundation (EF) is an impact-driven non-profit that works on the ground to create conditions for nature and people to thrive. Partnering with businesses, civil societies and governments, EF focuses on implementing responsible sourcing commitments in value chains, innovating practical solutions to the social and environmental challenges of production practices, and catalysing industry-wide chain reactions to help achieve transformation at scale.

Children in Plantations (CiP) is Earthworm's programme to protect the rights of children in the palm plantation sector, with a focus on Sabah, Malaysia. EF Malaysia works mainly with companies in the palm oil industries to identify issues affecting children in plantations and to develop solutions to mitigate the risks faced by children.

Earthworm Foundation (EF) extends a special thank you to ADM Cares, Nestle and PZ Cussons for supporting the development and publication of the Child Risk Assessment Framework (CRAF).

For more information about Earthworm Foundation, visit our webpage at [www.earthworm.org](http://www.earthworm.org)

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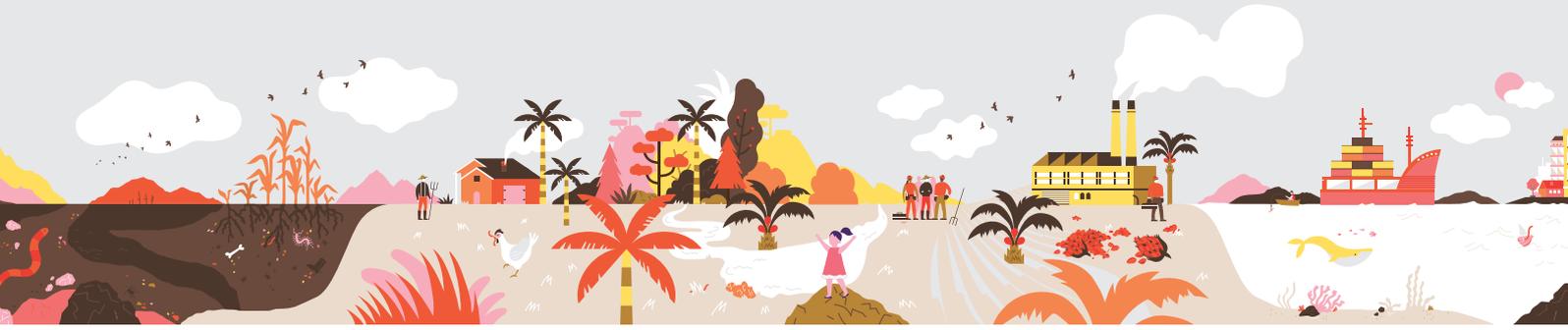


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## About the Child Risk Assessment Framework (CRAF)



### Context

The social impacts of the palm oil sector on children's well-being have been under heightened scrutiny in recent months. Associated Press investigations have found child labour<sup>1</sup>, allegations of sexual exploitation, abuse and exposure of pregnant workers to chemicals linked to palm oil plantations in Malaysia. Recently, the industry also witnessed action taken in response to some of these issues when US Custom and Border Protection banned the import of palm oil and palm oil products from one Malaysian producer. The prevalence of these social and human rights issues put palm oil producer companies risk of reputational damage, exclusion from supply chains, financial liabilities if fines are imposed, and restricted market access.

"Children are affected in multiple ways by the palm oil sector-as dependent of workers, members of the community, and at times, workers themselves. Child labour has long been a recognised concern in the industry. However, the impact of the sector on children extends beyond child labour. Children living in remote areas-in and around palm oil plantations have limited access to education, healthcare, decent living conditions, clean water, sanitation, birth the registration, and they are also vulnerable to sexual exploitation and abuse. A lack of protection for pregnant and nursing female workers is also a key concern and will directly and indirectly have an impact on children. Due to poverty, these children also experience poor nutrition" ---UNICEF<sup>2</sup>

### What is Child Risk Assessment Framework (CRAF)?

This CRAF is a guidance document with six toolkits of guidelines and self-assessment frameworks for palm oil producer companies to:

-  Identify potential risks faced by children in palm oil plantations
-  Develop policies, procedures and interventions to minimise risk by responding in a timely manner to the identified potential risks
-  Remediate adverse impacts discovered
-  Review whether adequate measures have been taken to prevent, eliminate or reduce these risks
-  Make oil palm plantation sites and the surrounding areas a safe place to work and to live, for children and for young people

This CRAF was designed for palm oil plantation companies in Sabah, Malaysia, but it can be adapted to other industries and locations where children and young persons are present. It aims to help companies to understand and to apply the requirement of international standards such as the ILO Conventions on Child Labour & Worst Form of Labour, the industrial standards and criteria of the Roundtable on Sustainable Palm Oil (RSPO), the national legislation, customers' standards or buyer's requirements.

1 <https://apnews.com/article/indonesia-slavery-asia-malaysia-only-on-ap-f258329cd8ec06fb9b296ef7ee6f6e42>

2 See Palm Oil and Children in Indonesia: Exploring the Sector's Impact on Children's Rights, UNICEF, 2016 available at <https://www.unicef.org/indonesia/media/1876/file/Palm%20oil%20and%20children%20in%20Indonesia.pdf>



## Who Should Use the Child Risk Assessment Framework (CRAF)?

It has been developed for human resource managers, estate managers, mill managers, sustainability officers and Fresh Fruit Bunches (FFB) procurement team.

## Why Should Companies Undertake a Child Risk Assessment?

The UN Convention on the Rights of the Child (CRC)<sup>3</sup> recognises the fundamental human dignity of all children and the urgency of ensuring their well-being and development. It makes clear the idea that a basic quality of life should be the right of all children, rather than a privilege enjoyed by a few. As set out in the UNICEF Children Rights and Business Principles<sup>4</sup>, companies have responsibilities to prevent and address risks to child rights in their business operations.

Because these issues deserve care and close attention, companies need to employ a holistic approach to protect children in plantations. This is to ensure that:

- children are safe where they live, learn and play;
- they are free from child labour;
- young workers' safety is protected;
- girls and boys have access to education that build their skills and capacities, with or without documentation;
- children are registered at birth;
- children at heightened risks of sexual exploitation and abuse are identified and assisted;
- pregnant workers and breastfeeding mothers are protected from performing tasks that will harm the foetus/baby's health; and
- to reduce the morbidity and mortality of children by ensuring adequate access to healthcare services, clean water and sanitation, decent living condition and good nutrition

## How to Use the CRAF?

There are six toolkits in this document. Each toolkit is divided into two sections:



The first section of each toolkit provides guidelines on what companies can do to prevent and to mitigate specific types of risks faced by children and young people in plantations.



The second section contains assessment criteria that companies can use to self-assess its practices in the prevention and mitigation of risks.

Ideally, companies are strongly recommended to work closely with third party organisations or service providers that have technical expertise in child protection, children's education, early childhood, gender-based violence (GBV) and maternal health, to implement the guidelines and to conduct the self-assessments in these toolkits.

### Tips

- **Consider the CRAF as a menu of options to pick and choose depending on your company's need.**
- **It is up to you to decide which sections and toolkits are relevant for your particular situation.**
- **This document can be read in full by those who are interested- in gaining an in-depth understanding of the issues, or it can be used as a reference guide for information on specific topics.**

<sup>3</sup> <https://www.unicef.org/what-we-do/un-convention-child-rights/>

<sup>4</sup> [https://www.unicef.org/corporate\\_partners/index\\_25078.html](https://www.unicef.org/corporate_partners/index_25078.html)



# Why Are Children's Rights Relevant for Palm Oil Producers?



**Children are people in their own right**, just like the adults, with contributions to make and ideas to share. They are human beings and are the subject of their own rights. Respect for children's right is a right thing to do both for the company and its workforce.



Companies have the responsibility to make sure their staff and **business operations do no harm to children**, and companies' activities do not expose children to the risk of harm and abuse, and are obligated to address those risks with measures that establish child-safe companies.



Company has legal obligation to **comply with the national laws** in Malaysia.



Company needs to **manage its reputation**- child labour puts company at a greater risk of reputational damage which can lead to exclusion from supply chain, and in order to run your business without interruption/ and opposition, you need to ensure good reputation.



Company has the **corporate responsibility** to respect children's rights -- avoiding any infringement of the human rights of others, including children, and addressing any adverse human rights impact with which the business is involved.



**To stay in business or to grow** your business, company needs to comply to several industry standards, legal, buyer and creditor's requirements, as international buyers will require proof that business is free of child labour.



# Glossary

Term	Description
<b>Best Interest of the Child</b>	When a decision or intervention is made about a child's situation, it must ensure the end goal is to protect the security and safety, the well-being and development of the child.
<b>Child</b>	According to the United Nations, a child is any person under the age of 18.
<b>Child Labour</b>	Child labour is work performed by children that is mentally, physically, socially or morally dangerous and harmful to children, affecting their health and personal development, or that interferes with their schooling - whether or not work performed by children is defined as child labour depends on the child's age, the hours and type of work and the conditions in which the work is performed <sup>5</sup> .
<b>Child Rights</b>	All children have the right to be treated with dignity and fairness, to be protected, to develop to their full potential and to participate. The Convention of the Rights of the Child (CRC) sets out the civil, political, economic, social and cultural rights that everyone under 18 is entitled to <sup>6</sup> .
<b>Child Rights Due Diligence</b>	An approach that enables companies to identify, prevent, address and monitor the direct and indirect impact they may have or contribute towards on children as a result of their business practices – in the workplace and beyond.
<b>Child Sexual Abuse</b>	Refers to any form of sexual activity with a child by an adult or by another child who has power over the child. By this definition, it is possible for a child to be sexually abused by another child. Child sexual abuse often involves body contact <sup>7</sup> .
<b>Confidentiality</b>	Survivors have the right to choose to whom they will or will not tell their story, and any information about them should only be shared with their informed consent <sup>8</sup>
<b>Disclosure</b>	The process of revealing information. Disclosure in the context of sexual abuse refers specifically to how a non-offending person (for example, company employee, teacher or helper) learns about a child's experience with sexual abuse. <sup>9</sup>
<b>Do No Harm Approach</b>	A 'do no harm' approach involves taking all measures necessary to avoid exposing people to further harm as a result of the actions of humanitarian actors. <sup>10</sup>
<b>Gender-based Violence (GBV)</b>	Gender-based violence (GBV) is an umbrella term for any harmful act that is perpetrated against a person's will and that is based on socially ascribed (i.e. gender) differences between males and females <sup>11</sup>
<b>Hazard</b>	A danger or risk - anything that has the potential to cause harm.
<b>Hazardous Work</b>	Refers to work undertaken in dangerous or unhealthy conditions that could result in a child being killed or injured/harmed due to poor safety and health standards in work place.
<b>ILO Conventions</b>	Refers to international agreement on an important labour-related issue that has been reached by governments, workers and employers meeting at the annual International Labour Conference of the ILO. Ratification may involve the inclusion of provisions specific to the circumstances of the country. Once ratified, the country is bound to carry out the provisions of the Convention (as ratified). The ILO reviews the implementation of Conventions and holds countries accountable <sup>12</sup>
<b>Light Work</b>	The Convention No.138 on Minimum Age for Work defines light work for children as: a) unlikely to be harmful to their health or development b) not such as to prejudice their attendance at school, their participation in vocational orientation or training programmes approved by the competent authority, or their capacity to benefit from the instruction received

<b>Mandatory Reporting</b>	This refers to state laws and policies which mandate certain agencies and/or persons in helping professions (teachers, social workers, health staff, etc.) to report actual or suspected child abuse (e.g., physical, sexual, neglect, emotional and psychological abuse, unlawful sexual intercourse) <sup>13</sup>
<b>Service providers</b>	Education, Health and psychosocial service providers charged with providing direct services to children and/or survivors of gender-based violence. These professionals include caseworkers, social workers, health workers, child protection workers, gender officers
<b>Sexual Exploitation</b>	Any actual or attempted abuse of a position of vulnerability, differential power or trust for sexual purposes. This includes profiting monetarily, socially or politically from the sexual exploitation of another (see also sexual abuse) <sup>14</sup> .
<b>Survivor</b>	A person who has experienced gender-based violence. The terms “victim” and “survivor” can be used interchangeably. Although “victim” is generally preferred in the legal and medical sectors, and “survivor” in the psychological and social support sectors. Throughout CRA, we use “child survivor” <sup>15</sup> .
<b>Third-party supplier</b>	Refers to any third-party supplier of goods or services to the Company that does not come under the direct control of either the Company (first party) nor the customer/buyer (second party) in a business transaction.
<b>UN Convention of the Rights of the Child (CRC)</b>	An important agreement by countries who have promised to protect children’s rights. It explains who children are, all their rights, and the responsibilities of governments. All the rights are connected, they are all equally important and they cannot be taken away from children <sup>16</sup>
<b>Undocumented migrant</b>	Refers to a migrant worker who is not in possession of a valid work pass (pas lawatan kerja sementara - PLKS) in Malaysia.
<b>Worst Forms of Child Labour</b>	The worst form of child labour includes all types of slavery, including but not limited to the sale and trafficking of children; forced labour to pay off a debt; including using children in war and armed conflict; all activities which sexually exploit children, such as prostitution, pornographic performances; any involvement in illegal activities, especially the production or trafficking of drugs; any work which could damage the health, safety or well-being of children (so called “hazardous work”) <sup>17</sup> .
<b>Young Persons in Employment</b>	Not all work done by children under the age of 18 is classified as child labour. The legislation allows for some forms of work to be undertaken by children under the age of 18. Participation in decent work which does not affect their health, personal development or education can be a very positive experience for children or adolescents who have reached the required age <sup>18</sup> .

5 Cited the ILO’s definition of child labour available at <https://www.ilo.org/ipec/facts/lang-en/index.htm>

6 Cited the UNICEF UK Child Rights Partners factsheet, UNICEF, available at [https://www.unicef.org.uk/child-rights-partners/wp-content/uploads/sites/3/2016/08/CRC\\_summary\\_leaflet\\_Child\\_Rights\\_Partners\\_web\\_final.pdf](https://www.unicef.org.uk/child-rights-partners/wp-content/uploads/sites/3/2016/08/CRC_summary_leaflet_Child_Rights_Partners_web_final.pdf)

7 Cited the Caring for Child Survivors of Sexual Abuse, IRC & UNICEF, 2010 available at <https://www.unicef.org/media/73591/file/IRC-CSS-Guide-2012.pdf.pdf>

8 Cited the Minimum Standards for Prevention and Response to Gender Based Violence in Emergencies, UNFPA, 2015, available at [https://www.unfpa.org/sites/default/files/pub-pdf/GBVIE\\_MinimumStandards.Publication.FINAL\\_ENG\\_.pdf](https://www.unfpa.org/sites/default/files/pub-pdf/GBVIE_MinimumStandards.Publication.FINAL_ENG_.pdf)

9 Cited the Caring for Child Survivors of Sexual Abuse, IRC & UNICEF, 2010 available at <https://www.unicef.org/media/73591/file/IRC-CSS-Guide-2012.pdf.pdf>

10 Cited the Minimum Standards for Prevention and Response to Gender Based Violence in Emergencies, UNFPA, 2015, available at [https://www.unfpa.org/sites/default/files/pub-pdf/GBVIE\\_MinimumStandards.Publication.FINAL\\_ENG\\_.pdf](https://www.unfpa.org/sites/default/files/pub-pdf/GBVIE_MinimumStandards.Publication.FINAL_ENG_.pdf)

11 Ibid

12 Cited the Checkpoints for Companies: Eliminating and Preventing Child Labour, ILO, 2016 available at [https://www.ilo.org/global/publications/WCMS\\_456960/lang-en/index.htm](https://www.ilo.org/global/publications/WCMS_456960/lang-en/index.htm)

13 Cited the Caring for Child Survivors of Sexual Abuse, IRC & UNICEF, 2010 available at <https://www.unicef.org/media/73591/file/IRC-CSS-Guide-2012.pdf.pdf>

14 Ibid

15 Ibid

16 Cited the UNICEF’s definition of child rights available at <https://www.unicef.org/media/60981/file/convention-rights-child-text-child-friendly-version.pdf>

17 Cited ILO’s definition of worst forms of child labour available at <https://www.ilo.org/ipec/facts/lang-en/index.htm>

18 Cited the Checkpoints for Companies: Eliminating and Preventing Child Labour, ILO, 2016 available at [https://www.ilo.org/global/publications/WCMS\\_456960/lang-en/index.htm](https://www.ilo.org/global/publications/WCMS_456960/lang-en/index.htm)



## Background Context of Children in Plantations

Nearly 85 % of global palm oil is produced in Indonesia and Malaysia. Malaysia currently accounts for 28 % of the world's palm oil production and 33% of world exports<sup>13</sup>. There are 505,972 plantation workers in Malaysia<sup>14</sup>. The palm oil industry in Malaysia relies heavily on migrant labour, which makes up 70-80% of the plantation workforce. It's also a destination country, predominantly for undocumented labour migrants from neighbouring Indonesia and Philippines. This is especially apparent in the palm oil industry in Sabah.

*"Unlike in Peninsular Malaysia, as of 2015, foreign workers in Sabah may be granted family visas, thus enabling them to bring their family members with them, on the condition that they earn RM2,500 (monthly) or above. Indonesian and Filipino children are often seen to migrate with their parents (legally and irregularly) to Sabah, while some children of foreign workers were born in Sabah. The Government of Indonesia estimated that there are at least 60,000 Indonesian children living around plantation areas across Sabah, where some of them may be living in poverty with relatively little access to education"<sup>15</sup>.*

Based on findings from the previous Earthworm Foundation consultation with companies in Sabah that took place in 2017, it was found that children and young persons were involved in a number of plantation activities including weeding at nurseries, stacking palm fruits, harvesting and manuring, slashing, collecting loose fruits and spraying<sup>16</sup>. These activities were reported to have taken place in both commercial plantations and small growers' estates. The children and young people who were found to be involved in these activities on commercial plantations were not on any official employment record.

These findings are consistent with several empirical studies that have been conducted in Sabah, and according to ILO's report<sup>17</sup> migrant children were found to be working on palm oil plantation sites. Some of

these children work informally but on a full-time basis, and therefore miss out on education, assisting their parents by undertaking tasks that might be harmful to their health and safety. The Employment Survey in Oil Palm Plantation, Malaysia 2018<sup>18</sup>, published by the Ministry of Plantation Industries and Commodities (MPIC), estimated that 33,600 children aged 5-17 years old are child labour. The prevalence rate of child labour associated with palm oil is 11.5% with Sarawak being the highest at 15.3%, followed by Sabah at 12.1%. Less than 500 children are in forced labour with the highest share seen in Sabah at 86.2%. The majority of these children are non-Malaysian citizens (85.5%) and are mainly between the age group of 15 and 17 years old<sup>19</sup>.

In October 2020, the US Customs and Border Protection (CBP) blocked the import of palm oil made by a Malaysian producer over forced labour concerns including forced child labour<sup>20</sup>.

The use of child labour is clearly prohibited in the No Deforestation, No Peat and No Exploitation (NDPE)<sup>21</sup> commitments under the No Exploitation component. About 70% of the refining capacity in Malaysia and Indonesia is currently covered by NDPE policies. The Roundtable on Sustainable Palm Oil (RSPO) standards considers the protection of children's rights and their safety, including the prohibition of child labour on plantations, to be a priority<sup>22</sup>. This implies that palm oil producers have the responsibility to prohibit the use of child labour in their own business operations and in their supply chains. Malaysia has ratified the UN Conventions of the Rights of the Child (CRC), ILO Fundamental Conventions on Minimum Age Conventions (138), Worst Forms of Child Labour Convention (C182) and Forced Labour Convention (C 29) which are of particular relevance on combatting child labour, forced labour and human trafficking<sup>23</sup>. Malaysia has ratified the Protocol to Prevent, Suppress and Punish Trafficking in Persons, especially women and children.

13 <http://mpoc.org.my/malaysian-palm-oil-industry/>

14 <https://rspo.org/news-and-events/news/protecting-local-labour-rights-in-the-palm-oil-sector>

15 Cited the Children in the Plantation of Sabah: Stakeholder Consultation Report, TFT, 2017, available at <https://toolsfortransformation.net/wp-content/uploads/2020/04/TFT-Children-in-Plantations-Report.pdf>

16 Ibid

17 Poulsen B., Too Yang-Tau., AB Wahab, A. Background Study on Strengthening Nation Action Plan To Address Child Labour in Malaysia: ILO Working Paper (Geneva, ILO), 2019

18 Cited the Employment Survey in Oil Palm Plantations, Malaysia 2018, Ministry of Plantation Industries and Commodities, 2018

19 Ibid

20 <https://www.scmp.com/news/asia/southeast-asia/article/3103754/us-bans-palm-oil-imports-one-malaysias-biggest-producers>

21 <https://proforest.net/en/publications/04-understanding-commitments-to-no-deforestation-no-peat-and-no-exploitation-ndpe>

22 [https://rspo.org/library/lib\\_files/preview/1404](https://rspo.org/library/lib_files/preview/1404)

23 Background on Strengthening National Action Plan To Address Child Labour in Malaysia (unpublished), ILO, 2019



## What Makes a Child or Young Person at Risk in Palm Oil Plantations?



1. **Lack of Documentation** contributes to children at risk in Sabah. In particular, migrant children face multiple forms of discrimination that stem largely from their uncertain legal status in Malaysia. The fear of arrest and detention has meant that many migrant workers do not apply for birth certificates for their children. This can have wide-ranging impact as without a birth certificate, children are denied access to education, healthcare, and other basic services. Children who are not attending school are likely to start working at very young ages. Their lack of documentation and legal status means that they are without recourse in the event of unfair treatment, abuse, violence or injury in the workplace.



2. **The Low Wages of Working Parents cause children and young persons to be at risk of being mobilised by their parents- to assist them to produce higher outputs to earn enough money to live.** Palm oil activities where children and young persons may be working include collecting loose fruits (children and young persons); harvesting and manuring (young persons); spraying (young persons); loading fresh fruit bunches (young persons); and slashing, which may pose common safety and health hazards<sup>24</sup>.



3. **Medium and Small Size palm oil producers and third-party suppliers have limited knowledge and awareness of the law.** The Background Study on Strengthening Nation Action Plan To Address Child Labour in Malaysia, conducted by Poulsen B., Too Yang-Tau., AB Wahab, A., in 2019, pointed out that many companies are not aware about what is permissible and non-permissible work for children and young people.



4. **Lack of Law Enforcement** due to the limited number of labour inspectors, coupled with the remoteness of many plantations and oil palm companies, has been the key challenge for enforcement agencies such as the Labour Department to undertake comprehensive monitoring of compliance to national laws and regulations concerning children and young workers<sup>25</sup>.



5. **Limited educational facilities and child care facilities (i.e. crèche)** in or around plantations have caused some parents to bring their children to work in plantations. This further risks children assisting their parents in their work. Some learning centres are located far from their housing areas, and parents (workers) are reluctant to send their children to these learning centres. For young people, there are very limited options for continuing their secondary education. As such, these young people often seek employment in the same plantation where their family members work.



6. **Gaps in Access to Healthcare** in remote areas due to lack of transportation and distance. Poulsen B., Too Yang-Tau., AB Wahab, A. found that many communities have to travel at least three hours along dangerous terrain or logging roads to reach the nearest clinic. There are also gaps in the overall quality of services, especially for children in rural areas and marginalised communities who face health concerns such as malnutrition.

<sup>24</sup> Children in Plantation of Sabah, Earthworm Foundation, 2018, available at <https://www.earthworm.org/uploads/files/Children-in-Plantations-of-Sabah-2017-report.pdf>

<sup>25</sup> Poulsen B., Too Yang-Tau., AB Wahab, A. Background Study on Strengthening Nation Action Plan To Address Child Labour in Malaysia: ILO Working Paper (Geneva, ILO), 2019



## A Brief Snapshot of the National Legal Framework that is Relevant for Children in Plantations

Legislation	Scope
Child Act 2001 <sup>24</sup> (Peninsular Malaysia, Sabah & Sarawak)	Provisions relating to the care, protection and rehabilitation of children
Children & Young Persons' (Employment) (Amendment) Act 2019 <sup>25</sup> (Peninsular Malaysia) <i>(For full details, refer to toolkit 1)</i>	Has special provisions relating to the employment of children and young people in Peninsular Malaysia-e.g. working hours, types of works, hazardous list
Sabah Labour Ordinance 1950 <sup>26</sup> <i>(For full details, refer to toolkit 1)</i>	Provisions relating to the employment of children and young people in Sabah
Sarawak Labour Ordinance 1952 <sup>27</sup> <i>(For full details, refer to toolkit 1)</i>	Provisions relating to the employment of children and young people in Sarawak
Education Act 1966 <sup>28</sup>	Provisions relating to education and matters connected therewith
Domestic Violence Act 1994 (Amendment 2017) <sup>29</sup>	Related to the provision of legal, physical protection and remedy in situations of domestic violence
Sexual Offences against Children's Act 2017 <sup>30</sup>	The law is aimed at protecting children aged 18 and below from sexual crimes which is in line with the Child Act 2001.
Workers' Minimum Standards of Housing and Amenities (Amendment) Act 2019 -applicable to Peninsular Malaysia & Federal Territory of Labuan <sup>31</sup>	The law outlines the responsibilities of employer to ensure that the accommodation provided to employees and their families has decent amenities & facilities for the employees and the duties and responsibilities listed out with regards to health and safety.
Anti-Trafficking in Persons & Anti-Smuggling Act 2007(APTISOM Act)- Peninsular Malaysia, Sabah and Sarawak	Provisions related to the prosecution of offenders, and protection of victims particularly women and children.

24 <https://orphancare.org.my/wp-content/uploads/2017/02/Child-Amendment-Act-Malaysia-2016-1.pdf>

25 [http://www.federalgazette.agc.gov.my/outputaktap/20190118\\_A1586\\_BI\\_BI.pdf](http://www.federalgazette.agc.gov.my/outputaktap/20190118_A1586_BI_BI.pdf)

26 <https://toolsfortransformation.net/wp-content/uploads/2017/03/Malaysian-Law-Sabah-Labour-Ordinance-CAP-67.pdf>

27 [http://lawnet.sarawak.gov.my/lawnet\\_file/Ordinance/ORD\\_F-LABOUR%20LawNet\(Watermark\)FRO.pdf](http://lawnet.sarawak.gov.my/lawnet_file/Ordinance/ORD_F-LABOUR%20LawNet(Watermark)FRO.pdf)

28 <http://www.agc.gov.my/agcportal/uploads/files/Publications/LOM/EN/Act%20550.pdf>

29 <https://learningpartnership.org/sites/default/files/resources/pdfs/Malaysia-Domestic-Violence-%28Amendment%29-Act-2017-%28Act%20A1538%29-English.pdf>

30 <http://www.foongchengleong.com/downloads/Sexual%20Offences%20Against%20Children%20Act%202017.pdf>

31 [http://www.maicsa.org.my/media/5315/technical\\_announcements\\_200703\\_2\\_2.pdf](http://www.maicsa.org.my/media/5315/technical_announcements_200703_2_2.pdf) and [http://www.maicsa.org.my/media/5314/technical\\_announcements\\_200703\\_2\\_1.pdf](http://www.maicsa.org.my/media/5314/technical_announcements_200703_2_1.pdf)



# Toolkit 1

Risks Relating to Child Labour & Young  
Workers in Palm Oil Plantations



# Toolkit 1

## Risks Relating to Child Labour & Young Workers in Palm Oil Plantations

This toolkit provides guidelines on what companies can do to:

- (a) prevent risks of child labour;
- (b) prevent and mitigate the occupational, safety and health risk of young workers;
- (c) provide remedy if child labour is found; and
- (d) include elements of assessment criteria in the company's self-assessment in regard to the prevention and mitigation of child labour.

Child labour is work performed by children that is mentally, physically, socially or morally dangerous and harmful to children, affecting their health and personal development, or that interferes with their schooling—whether or not work performed by children is defined as child labour depends on the child's age, the hours and type of work and the conditions in which the work is performed<sup>32</sup>.

Work in palm oil plantations and mills can be described as work that harm children's health and safety. Mills use heavy processing machinery such as boilers and work in plantations can involve using hazardous chemicals (pesticides and herbicides), moving heavy loads and using sharp equipment. Therefore, no children should be in employment in either palm oil plantations and mills<sup>33</sup>.

Prevention and responding to the risk of child labour requires due diligence by palm oil producers and their third-party suppliers. Good practices to address child labour have emerged from previous interventions to prevent children at risk from becoming child labourers, abolish hazardous working conditions, and withdraw/rehabilitate children from the worst forms of child labour.

<sup>32</sup> Cited the ILO's definition of child labour available at <https://www.ilo.org/ipec/facts/lang-en/index.htm>

<sup>33</sup> Guidelines for Indonesian Palm Oil Companies: Mitigating the Risk of Child Labour in Plantations, Earthworm Foundation, 2020





## Definition of Child, Children in Employment and Child Labour in Malaysia

Below is the summary table for the employment terms between a child and a young person and summary definition of hazardous work and light work.

Information	Children and Young Persons (CAYPEA) (Employment) Act (Amendment 2019) <sup>34</sup>	Sabah Labour Ordinance 1950 <sup>35</sup>	Sarawak Labour Ordinance 1952 <sup>36</sup>
Geographical applicability.	Peninsular Malaysia	Sabah	Sarawak
Definition of (a) Child(ren) (b) Young persons	A child refers to a person under the age of 15 years old. A young person refers to a person who is 15 years old and above but under the age of 18		
Definition of Light Work	Any work which is not likely to be harmful to the child's health, mental, or physical capacity or to prejudice his/her attendance at school.		
Definition of Child Labour in Malaysia	There is no specific definition of child labour in the current legislation. However, the legislation does refer to the "non-allowable work" to be engaged by children and young people.		
<b>Permissible Employment According to Age Group</b>			
Children < 12 	Must not engage in any work but to be in school	Must not engage in any work but to be in school	
13-14 	Allowed to engage in light work including work carried out by his/her family.	Allowed to engage in light work including work carried out by family.	
	Employment in any public entertainment in accordance to terms and conditions granted under the CAYPEA Act	Employment in any public entertainment in accordance to terms and conditions granted under the Sabah and Sarawak Labour Ordinances	
	Apprentice with a contact approved by the Director General of Law	Apprentice with a contact approved by the Director General of Law	
	Work approved by Federal Gov/ State Gov and carried on in school/ training institution	Work approved by Federal Gov/State Gov and carried on in school/ training institution	
	Maximum of 6 days a week if attending school	Maximum of 6 days a week if attending school	
	Maximum of 7 hours a day if attending school	Maximum of 7 hours a day if attending school	
	Maximum of 3 consecutive hours without a rest of at least 30 mins	Maximum 3 consecutive hours without a rest of at least 30 mins	
	Must not work between 8pm- 7am (except in public entertainment)	Must not work between 8pm- 7am (except in public entertainment)	

<sup>34</sup> [https://storage.googleapis.com/wzukusers/user-27630244/documents/5c9b45e50d8daty8yXxx/Children%20and%20Young%20Persons%20\(Employment\)\(Amendment\)%20Act%202019.pdf](https://storage.googleapis.com/wzukusers/user-27630244/documents/5c9b45e50d8daty8yXxx/Children%20and%20Young%20Persons%20(Employment)(Amendment)%20Act%202019.pdf)

<sup>35</sup> <https://toolsfortransformation.net/wp-content/uploads/2017/03/Malaysian-Law-Sabah-Labour-Ordinance-CAP-67.pdf>

<sup>36</sup> [http://lawnet.sarawak.gov.my/lawnet\\_file/Ordinance/ORD\\_F-LABOUR%20LawNet\(Watermark\)FRO.pdf](http://lawnet.sarawak.gov.my/lawnet_file/Ordinance/ORD_F-LABOUR%20LawNet(Watermark)FRO.pdf)

Information	Children and Young Persons (CAYPEA) (Employment) Act (Amendment 2019) <sup>34</sup>	Sabah Labour Ordinance 1950 <sup>35</sup>	Sarawak Labour Ordinance 1952 <sup>36</sup>
Geographical applicability.	Peninsular Malaysia	Sabah	Sarawak
<b>Permissible Employment According to Age Group</b>			
15-17 	Employment involving light work that is suitable to the capacity of the young person (whether or not the work is carried on by his/her family)	Allowed for employment suitable to the capacity of the young person	
	Employment in any office, shops, hotels, restaurants/workshop, cinema, boarding house, theatre, stall, factory, club, association	Employment in any office, shops, hotels, restaurants/workshop, cinema, boarding house, theatre, stall, factory, club, association  <i>*no female young person may be engaged in any employment in hotels, bars, restaurants, boarding houses or clubs unless such establishments are under the management or control of her parent or guardian</i>	
	Employment in industrial undertaking suitable to the young person's capacity	Employment in industrial undertaking suitable to the young person's capacity	
	Employment in any vessel under the personal charge of the young person's parents/guardian	Employment in any vessel under the personal charge of the young person's parents/guardian	
	Maximum of 6 days a week	Maximum of 6 days a week	
	Maximum of 7 hours a day/ or if attending school, max 8 hours including school hours	Maximum of 7 hours a day/ or if attending school, max 8 hours including school hours	
	Must not work between 8pm-6am except in agriculture, public entertainment, and any vessel	Must not work between 8pm-6am except in agriculture, public entertainment and any vessel	
	<p>Hazardous work is not allowed for all children and young people in Peninsular Malaysia.</p> <p>Refer to CAYPEA Amendment 2019-4th Schedule<sup>37</sup> for full list of hazardous work.</p> <p>However, the legislation provides one exception:            *A young person, however, may be engaged in hazardous work with personal supervision if he/she is working under an apprenticeship contract or undergoing vocational training, as provided under the newly inserted Section 2(1B) CAYPEA via the 2019 Amendments.</p>	<p>No hazardous work is allowed for all children &amp; young people in East Malaysia. No further definition/ and list of hazardous work provided by Sabah &amp; Sarawak Labour Ordinances.</p> <p>No child or young person is allowed for any employment contrary to the provisions of the Factories and Machinery Act 1967 [Act 139] or the Electricity Supply Act 1990 [Act 447] or in any employment requiring him to work underground.</p>	

\*Source 1: Children and Young Persons Employment (Amendment Act 2019), Sabah Labour Ordinance, Sarawak Labour Ordinance

\*Source 2: Poulsen B., Too Yang-Tau., AB Wahab, A. Background Study on Strengthening Nation Action Plan To Address Child Labour in Malaysia: ILO Working Paper (Geneva, ILO) 2019

<sup>34</sup> [https://storage.googleapis.com/wzukusers/user-27630244/documents/5c9b45e50d8daty8yXxx/Children%20and%20Young%20Persons%20\(Employment\)\(Amendment\)%20Act%202019.pdf](https://storage.googleapis.com/wzukusers/user-27630244/documents/5c9b45e50d8daty8yXxx/Children%20and%20Young%20Persons%20(Employment)(Amendment)%20Act%202019.pdf)

<sup>35</sup> <https://toolsfortransformation.net/wp-content/uploads/2017/03/Malaysian-Law-Sabah-Labour-Ordinance-CAP-67.pdf>

<sup>36</sup> [http://lawnet.sarawak.gov.my/lawnet\\_file/Ordinance/ORD\\_F-LABOUR%20LawNet\(Watermark\)FRO.pdf](http://lawnet.sarawak.gov.my/lawnet_file/Ordinance/ORD_F-LABOUR%20LawNet(Watermark)FRO.pdf)

<sup>37</sup> [https://storage.googleapis.com/wzukusers/user-27630244/documents/5c9b45e50d8daty8yXxx/Children%20and%20Young%20Persons%20\(Employment\)\(Amendment\)%20Act%202019.pdf](https://storage.googleapis.com/wzukusers/user-27630244/documents/5c9b45e50d8daty8yXxx/Children%20and%20Young%20Persons%20(Employment)(Amendment)%20Act%202019.pdf)



## What Can Companies Do to Prevent Child Labour?

### 1. **Develop a No Child Labour Policy:** Commit to Zero Tolerance against Child Labour & Worst Forms of Child Labour:

- Develop a No Child Labour Policy and signed off by the top management (e.g. Group CEO). Please refer to a sample template<sup>38</sup> on Policy Prohibiting Child Labour. You can also refer to Wilmar's No Child Labour Policy<sup>39</sup>
- Senior Management must communicate to contractors and third-party suppliers that its operation and products have to be free from child labour
- Top Management to communicate to employees and workers at all levels about company's commitment to say no to child labour.

### 2. **Develop Clear Recruitment Procedures** to Ensure All Workers are above the minimum legal age of employment at the time of hiring:

- Develop Standard Operating Procedures (SOP)s requesting for the proof of identification and proof of age to check birth date and to retain copies of birth registration to ensure workers are above the minimum legal age of employment.  
Without the proof of age, one cannot decide if a certain type of work is suitable for an individual
- Develop a workers' list<sup>40</sup> which consist of information such as their name, birth date, gender, academic qualification, work experience, nationality, job functions and date joined.
- Develop a system to verify the age of workers by requesting for birth certificates, school enrolment certificate, end of school completion certificates and interviews.  
Refer to ILO Tool on Age Verification: Protection for Unregistered Children from Child Labour<sup>41</sup>
- Keep a separate register of young workers below the age of 18 years old.

38 <https://toolsfortransformation.net/wp-content/uploads/2019/09/Annex-B-%E2%80%93-Sample-Policy-Prohibiting-Child-Labour.pdf>

39 [https://www.wilmar-international.com/docs/default-source/default-document-library/sustainability/policies/wilmar-no-child-labour-policy.pdf?sfvrsn=7d029e7f\\_2#:~:text=Wilmar%20does%20not%20employ%20any,compulsory%20labour%20its%20global%20operations.&text=This%20policy%20applies%20throughout%20Wilmar's,%2C%20and%20third%2Dparty%20suppliers.](https://www.wilmar-international.com/docs/default-source/default-document-library/sustainability/policies/wilmar-no-child-labour-policy.pdf?sfvrsn=7d029e7f_2#:~:text=Wilmar%20does%20not%20employ%20any,compulsory%20labour%20its%20global%20operations.&text=This%20policy%20applies%20throughout%20Wilmar's,%2C%20and%20third%2Dparty%20suppliers.)

40 <https://toolsfortransformation.net/wp-content/uploads/2019/09/Annex-D-%E2%80%93-Sample-Workers-Registration.pdf>

41 [https://www.ilo.org/ipec/Informationresources/WCMS\\_IPEC\\_PUB\\_29095/lang-en/index.htm](https://www.ilo.org/ipec/Informationresources/WCMS_IPEC_PUB_29095/lang-en/index.htm)

3. **Company to create a list of hazardous work that must not be carried out by children and young persons:**



Develop a list of hazardous work that must not be carried out by children and young persons based on the (CAYPEA) (Employment) Act (Amendment 2019)-Fourth and Fifth Schedule. Companies in Sabah and Sarawak are encouraged to use the CAYPEA enhanced hazardous list as guidance, as the Sabah and Sarawak Labour Ordinances are yet to be updated to reflect the enhanced hazardous list.

Please refer to the table below for a list of example.

Types of Work	Enhanced Definitions of Hazardous Work based on the Children and Young Persons Employment Act (Amendment 2019)	Permissible/ Non-Permissible
Harvesting fresh fruit branches without wearing protective gear, cutting fruit stalks and palm fronds  Carrying overload sacks of palm fruits to carts, climbing palm trees	Work in an environment with extreme temperature and moisture or high-speed wind;	Non-Permissible
	Working at height which can lead to serious bodily injury;	
	Manual handling works which may pose high risk such as lifting, lowering, pushing, pulling, carrying or moving a load.	
	Work in a dusty environment that is detrimental to health	
Spraying, Transport Fertiliser & Chemicals, weeding and pest control	Work in relation to production, processing, handling, storage, transport, removal, disposal or treatment of hazardous chemical as defined in the Occupational Safety and Health (Classification, Labelling and Safety Data Sheet of Hazardous Chemicals) Regulations 2013 [P.U. (A) 310/2013];	Non-Permissible
	Work in relation to production, processing, handling, storage, transport, removal, disposal or treatment of pesticides and schedule waste as defined in the Pesticides Act 1974 [Act 149] and the Environmental Quality (Scheduled Wastes) Regulations 2005 [P.U. (A) 294/2005].	
Kernel Crushing Plant, handling heavy machineries in mill plantations , loading ramp	Any machine tools or production machine which can pose high risk such as drilling machines, grinding machines, cutting machines, lathes machines, scraping machines, power press machine, knitting machines, weaving machines, packaging machines and bottling machines;	Non-Permissible
	Heavy-duty machinery such as tractors, rock breakers, graders, asphalt mixers, piling machine and agriculture machinery	
Manual weeding	Using of manual tools such as bush knives can exposed the user to dangerous cuts.	Non-Permissible
Cleaning the estate office	Not harmful and not worst forms of child labour. Even so, OSH risk analysis is needed, for instance using the HIRARC (Hazard Identification, Risk Assessment, and Risk Control) to minimize injuries and accidents	Permissible
Childcare caregiver		Permissible

4. **Organise Regular/Routine Training** for All Employees and Workers on the awareness of Child Labour & Worst Form of Child Labour (as per needs, eg. weekly, monthly, annually)



Set up a training plan and routine according to the needs of your company.

Organise awareness raising sessions to increase workers and employees' understanding about the laws<sup>42</sup> governing child labour in Malaysia.

- Make it compulsory for mandur/supervisor, estate managers, mill workers, plantation workers, smallholders and third-party agents to attend the training.
  - Develop and maintain training attendance records to record attendance and training materials.
  - Engage service providers<sup>43</sup> to assist in developing training content that can include: how to spot “red flags” in the use of or risk of child labour; negative consequences of child labour if found in business or supply chains; and how it can negatively affect an individual child and their families.
5. Mandate new employees and workers to attend a **compulsory training/ on-boarding session** on no child labour policy:
- Make it compulsory for company's new recruits to be trained on the company's No Child Labour Policy
  - Articulate the company's expectation of its new recruits, including third-party suppliers and contractors concerning child labour
  - Request third-party suppliers to share their policies on child labour, and verify that if it includes the risk of the worst forms of child labour;
6. **Third-party suppliers' compliance:** Incorporate child labour expectations into suppliers' contracts and written agreements:
- Incorporate specific provisions on child labour in the contract's agreements with third-party third-party suppliers.  
\*These provisions need to be articulated in the contract -that for those who are found to be in breach of company's policies will face penalties.
  - Attach a copy of company's policy on the prohibition of child labour and worst forms of child labour to the third-party suppliers' contract. This is to enhance the understanding and compliance of third-party suppliers.
7. Conduct third-party supplier/partner **due diligence:**
- Assess if third-party supplier's procurement systems have a mechanism to prevent children under the legal age from being employed
  - Enquire third-party suppliers if there are/have been any reported cases of child labour
8. **Communicate No Child Labour policy message** to all employees, workers, third-party suppliers, contractors in languages that are understandable to them
- Develop user-friendly info-graphics and communication materials to illustrate the company's commitment against Child Labour.  
You can refer to a sample of infographics<sup>44</sup> developed by Nestlé.
  - Display materials such as posters in conspicuous places such as the public notice boards, on the walls, waiting areas, canteens etc. where they are easily visible to all workers and to outsiders.

To know more, you can refer to ILO-IOE Child Labour Guidance Tool for Business: How To Do Business With Respect for Children's Rights to be Free From Child Labour<sup>45</sup>.

42 \* e.g. what is permissible or non-permissible work for children and young workers; the limit on work days and hours and other conditions provided for in the law.

43 Services for Vulnerable Children in Sabah: What Business and Employees Should Know, Earthworm Foundation, 2019

44 <https://www.nestle.com/ask-nestle/human-rights/answers/nestle-child-labour-supply-chains>

45 <http://www.ilo.org/ipecinfo/product/download.do?type=document&id=27555>

## What can companies do to mitigate the Occupational, Safety and Health Risk of Young Workers?

### 1. Develop an Occupational, Safety and Health Policy (OSH) that also considers the young workers' vulnerability by ensuring effective and necessary measures are available to deal with all potential emergency situations and accidents within plantation sites.

- Develop an OSH policy that outlines measures that are to be taken to protect the safety and health of young workers, in particular covering how accidents and injuries should be reported, investigated, corrected and prevented from recurring  
The policy should include prohibitions on assigning to young workers particular tasks in accordance with legislation, and ensure that young workers under 18 do not undertake hazardous work.
- OSH policy to be signed off by top management
- Disseminate the OSH policy to young workers in the languages that they can understand
- Organise a briefing session with young workers to go through the OSH policy

### 2. Provide training to all employees and workers (including young workers) on OSH related topics, in languages that are understandable to them.

- Organise training regularly for young workers to ensure they comply with OSH standards in languages that they understand
- Develop training records to document attendance and training materials
- Develop training content  
Suggested topics: accident and emergency procedures; how to report accidents and injuries; safe working procedures on ergonomics; how to correctly use personal protective equipment; good hygiene practices; information on hazards of chemicals.
- Organise briefing sessions with young workers, supervisors/ mandur and estate managers on hazardous work that must not be carried out by children and young persons based on the CAYPEA Act Fourth and Fifth Schedule (Amendment Act 2019 ) and the Sabah Labour Ordinance, Sarawak Labour Ordinance.
- Organise townhall sessions to understand workers' perspectives on risks and their work environment and what can be improved from their viewpoint.

### 3. Ensure young workers receive **Personal Protective Equipment (PPE)** and know how to use such PPE.

- Provide adequate free provision of PPE to young workers
- Provide regular training to young workers on how to use PPE and the importance of it

### 4. Develop Covid-19 related protective measures to protect the health and safety of workers.

- Conduct regular awareness raising sessions for all workers on preventive measures with posters and videos on handwashing technique, social distancing and ensure emergency contacts are made available in various languages;

- Provide adequate supply of face masks to be worn during working hour
- Provide adequate supply of hand sanitiser
- Ensure workers' body temperatures are measured with a thermal scanner prior to start of work (on a daily basis).
- If workers display symptoms of Covid-19, assist workers to seek medical attention and care.
- Companies in Sabah are encouraged to implement the Employees' Minimum Standards of Housing, Accommodations and Amenities (Accommodations and Centralized Accommodation) Regulations 2019 even though it is gazetted for Peninsular Malaysia and Labuan.
- Conduct regular disinfection of common areas in the plantation.

## Mitigating the Risk of Child Labour: Remedies

For a company to fully meet its responsibility to respect child rights, a company ought to actively engage in the remediation of impacts it's operations have caused or otherwise contributed to. Having systems in place to enable effective remedy shows that a company is compliant with laws, upholds the rights of children and is able to restore respect for children's rights quickly and effectively should a case of child labour occur.

If Child Labour is found, what can companies do? (\*This section has been adapted from the Operational Procedures For Remediation of Child Labour in Industrial Contexts<sup>46</sup>, published by Impactt Limited in 2008. )

Below are the steps that your company can take if:

- Your workers are suspected to be underage
- Your workers bring family members, including children aged below the minimum age standard, to work locations, whether the child concerned does the work or not

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<sup>46</sup> [http://impacttlimited.com/wp-content/uploads/2017/01/Impactt\\_CLOPIIndustrialcontexts\\_REVISION\\_26112008.pdf](http://impacttlimited.com/wp-content/uploads/2017/01/Impactt_CLOPIIndustrialcontexts_REVISION_26112008.pdf)

## Phase 1a: Urgent Action (immediate term)

Responsible Party: Supervisor/Mandur, Plantation Estate Manager, Workers Welfare Contact Point

### STEP 01

#### Check their ID and make sure it is a genuine document to verify his/her age

In the case of undocumented children, it is suggested that company personnel ask questions such as:

- What is your date of birth?
- What year of animal were you born?-an alternative way to find out the age of the child if he/she doesn't know about their age
- What year did you enter school (if you have attended school?)
- What school have you attended?
- When was the last time you attended a school?
- Where did you work before coming here?

**\*Please note that If it involves a female child, ideally, female personnel should be mobilised to approach the child**

For more info on the importance of conducting a child-sensitive grievance mechanism, see [UNICEF's Operational Level Grievance mechanism fit for Children](#)

### STEP 02

If age verification is inconclusive, company personnel are best advised to remove the child immediately from the workplace and ensure the child is in a safe place such as school, childcare or his/her parents' house, if this is known

### STEP 03

Get the contact details of his/her parents/guardian and find out where the child. Ensure safe return of the child to their home, or another safe space until the child is back in the care of their parents/guardians.

## Phase 1b: Urgent Actions (Within 5 days)

Responsible Party: Company Management At Estate Level

### STEP 04

Verify the age of child(ren) through discussions with parents or close relatives or by checking other identity documents such as birth certificates, diplomas etc

### STEP 05

If the child(ren) is/are proven to be underage, notify higher management/decision makers and get their commitment for remediation

## Phase 2: Develop Remediation Action Plan (2 months)

### Responsible Parties: Company Management at Estate Level, and

#### STEP 06

Establish a remediation team and develop a Terms of Reference for the team in accordance with a remedial process. The remedial process has to consider the best interest of the child<sup>47</sup>.

An example of the remedial process can be found on the flow chart on page 18. While the company will lead in the child remediation process, third-party organisations/ service providers<sup>48</sup> that have expertise and relevant experience in working directly with children and families, should be appointed to be part of this remediation team. Hence, it is advisable for the company to establish a partnership agreement with a third-party organisations/ service providers.

#### STEP 07

The remediation team or appointed team representative should explain to the parents about the legal requirements and restrictions on working ages, and the importance of education. If the parents are your company workers, explain to them your company's policy on the well-being of children that should be followed by all company workers.

#### STEP 08

A team representative should ask the parents some questions about what has caused the child to work, assess the family background, and their needs and factors that cause the child to work. If the child does not want to go to school, find out the reasons.

#### STEP 09

If the causes are complex, and frequency of the cases is high, or if remediation cannot be done solely by your company's resources alone, contact service providers organisations that work for the welfare of children. For undocumented children, where service providers cannot be found or for serious matters, contact their Consulate or Embassy whereas for local children, government service providers would be more appropriate. You can refer to EF Services for Vulnerable Children Directory<sup>49</sup>

<sup>46</sup> <https://www.earthworm.org/uploads/files/Guideline-Mitigating-the-Risks-of-Child-Labour.pdf>

<sup>47</sup> The term "best interest" describes the well-being of the child. Any decisions should be made with the ultimate goal of fostering and encouraging the child's happiness, physical, mental and emotional development.

<sup>48</sup> Relevant organisations that have expertise in child protection, children's education, medical care, psycho-social services, shelter provisions should be appointed as part of the remediation team.

<sup>49</sup> <https://www.earthworm.org/uploads/files/Children-in-Plantations-Directory-2019.pdf>

## STEP 10

Based on an understanding of the causes discovered in step 8, prepare a remediation plan. Plans can be prepared on a case-by-case basis or can be more general and applied to similar cases that occur frequently. Any budget requirements to implement the plan must be developed and approved by higher management at this stage.

An example of remedial actions could be returning children to school or skills training through coordination with the government and/ other parties. If the dismissal of children from work affects family income, then children who can be employed as young workers could be considered to work in jobs that are not hazardous. For example, this could be work in a plantation office or employee housing. Young workers should be employed in line with all necessary regulatory requirements.

## STEP 11

Get senior management's buy in and approval on the remediation plan.

## STEP 12

Consult with parents/guardians and other relevant stakeholders on the development and implementation of the remediation plan and agree on the actions to be taken

## STEP 13

The company and its local partners (service providers) should then implement the plan

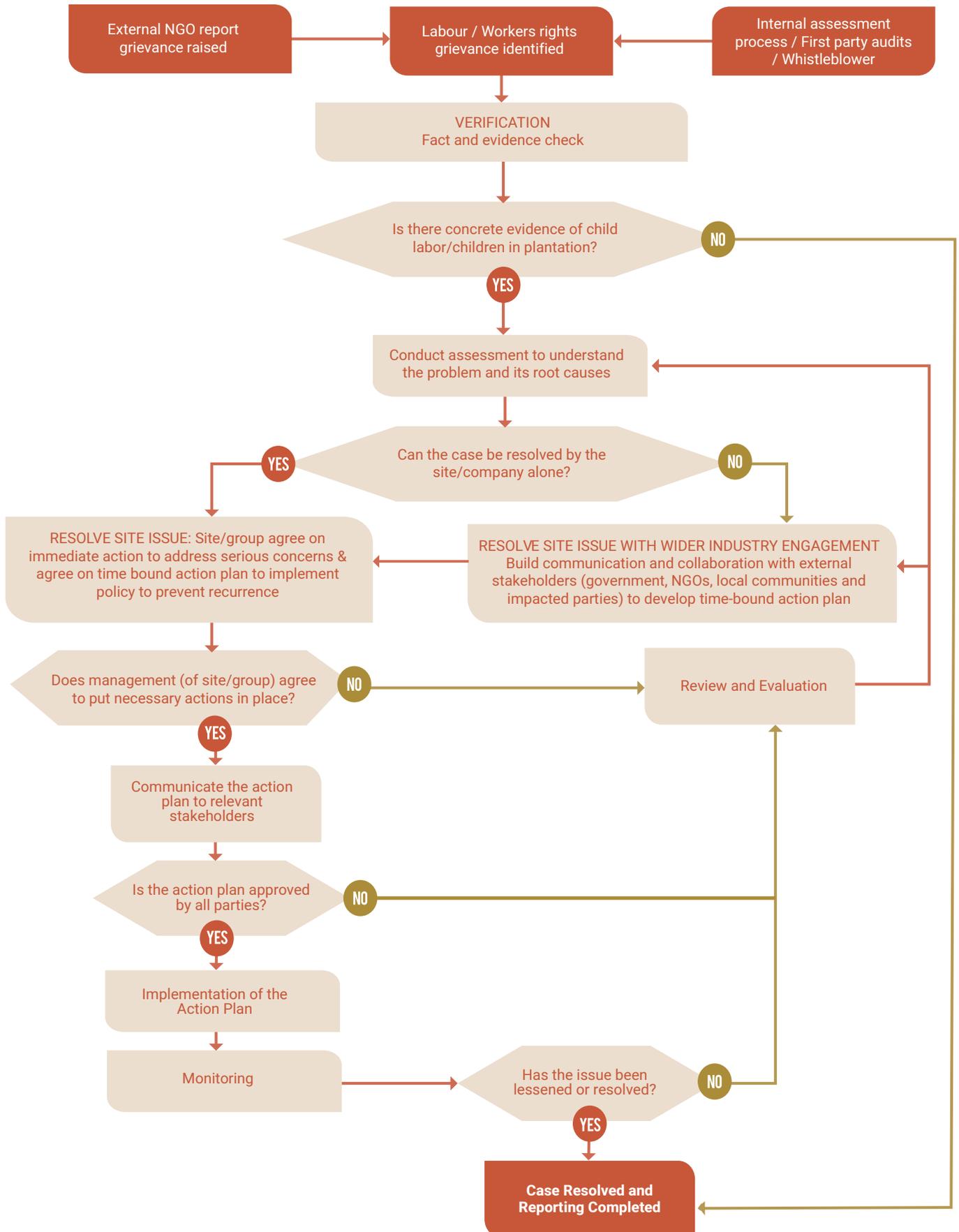
### Phase 3: Monitoring

**Responsible Parties: Company management at estate level and group level/headquarters**

## STEP 14

The well-being of the affected child(ren) and the effectiveness of the remediation plan should be monitored regularly to ensure the process is successful. This supervision can be carried out independently by the company or contracted to a third party for independent to increase accountability. You can refer to the EF Directory of Services for Vulnerable Children in Sabah for prospective third- party organisations/ service providers that your company might consider to work with.

## Decision making tree



## Self-Assessment

To effectively prevent and mitigate the risk of child labour, the steps set out above will take time to implement. To help make this a reality, this self-assessment questionnaire can be used by companies on a quarterly basis to record progress, support the establishment of milestones and to improve business practices.

Assessment Criteria (policies, procedures, processes and measures to address business impact on children)	Result (Y/N/Partially)	If you don't do this, what are the potential impacts on children & young persons? Allocate a Risk Level to each assessment criteria (High <sup>50</sup> , Medium <sup>51</sup> , Low <sup>52</sup> )
<b>Policy Commitment Against Child Labour &amp; Worst Form of Child Labour</b>		
Is there a written policy statement against Child Labour -that is signed off by the top management (e.g. group CEO)		
Do you have a mechanism to remove children if child labour is found on your plantation sites?		
<b>Standard Operating Procedures on Recruitment</b>		
Is there a clear recruitment procedure to ensure all workers recruited are above the minimum legal age of employment at the time of hiring?		
Are there procedures in place to verify the age of workers and to record workers profile information?		
Is there a workers' list which includes information such as their name, birth date, gender, academic qualification, work experience, nationality, job functions and date joined?		
Is there a list of workers aged under 18?		
Is there a list of hazardous work that must not be carried out by children and young persons, based on Malaysian national legislation?		
<b>Training</b>		
Is there annual training conducted for all employees, workers, contractors and third-party suppliers on the awareness of Child Labour & Worst Form of Child Labour?		
Is there training provided to estate managers and welfare of workers' focal point to detect Child Labour/ Worst Form of Child Labour?		
Do you mandate new employees, workers, third-party suppliers and contractors to attend a compulsory training/on-boarding session on Child Safeguarding Principles and No Child Labour Policy?		

50 Serious imminent risk to personal safety & health requiring immediate intervention and/ follow up within a few days

51 Likelihood of serious risk to personal safety & health requiring urgent scheduled intervention and follow up within 4-6 weeks. Note that cases placed in the medium risk category can move into the high-risk category if intervention does not take place

52 Likelihood of serious risk to personal safety & health is low but intervention for specific needs may be required

Third-party supplier Due Diligence			
Assessment Criteria (policies, procedures, processes and measures to address business impact on children)	Result (Y/N/ Partially)	If you don't do this, what are the potential impacts on children & young persons? Allocate a Risk Level to each assessment criteria (High <sup>53</sup> , Medium <sup>54</sup> , Low <sup>55</sup> )	
Is there a policy and practice to incorporate specific provisions against child labour & worst forms of child labour into contracts with third-party suppliers/ and contractors?			
Do you assess third-party supplier's compliance and ability to comply with no Child Labour Policies in their operations?			
Is there a mechanism in place to track and monitor the performance of third-party suppliers and contractors to assess their compliance on no child labour policies?			
Communication			
Do you communicate no child labour policy message to all employees, workers, third-party suppliers, contractors in languages that are understandable to them?			
Is there a policy that makes clear to all workers including the third-party suppliers and contractors that its operations and products have to be free from child labour and the worst form of child labour?			
Do you have user-friendly info-graphics and communication materials on the company's commitment against child labour?			
Do you display these messages in conspicuous places where they are easily visible to all workers and to outsiders?			
Child Labour Remedial Plan			
Do you have a child labour remedial plan, when child labour is identified?			
For those who have been assigned to deal with grievance reports, are they trained to deal with children?			
Occupational Safety and Health for Young Workers			
Assessment Criteria (policies, procedures, processes and measures to address business impact on children)	Result (Y/N/ Partially)	If you don't do this, what are the potential impact on children & young persons? Allocate a Risk Level to each assessment criteria (High <sup>56</sup> , Medium <sup>57</sup> , Low <sup>58</sup> )	
Is there an Occupational, Safety and Health Policy (OSH) to prevent accidents, injuries and diseases on plantation sites and mills?			
Is the OSH visibly displayed on notice boards in languages that are understandable for all workers?			

53 Serious imminent risk to personal safety & health requiring immediate intervention and/ follow up within a few days

54 Likelihood of serious risk to personal safety & health requiring urgent scheduled intervention and follow up within 4-6 weeks. Note that cases placed in the medium risk category can move into the high-risk category if intervention does not take place

55 Likelihood of serious risk to personal safety & health is low but intervention for specific needs may be required

56 Serious imminent risk to personal safety/ health/education/moral/ growth and development requiring immediate intervention and/ follow up within a few days

57 Likelihood of serious risk to personal safety/health/education/moral/growth and development requiring urgent scheduled intervention and follow up within 4-6 weeks. Note that cases placed in the medium risk category can move into the high-risk category if intervention does not take place

58 Likelihood of serious risk to personal safety/health/education/moral/growth and development is low but intervention for specific needs may be required

Are young workers provided with adequate training to ensure they comply with OSH standards for young workers?		
Are young workers provided with adequate free provision of Personal Protective Equipment (PPE), and appropriate & periodic training on how and why to use it in the right way?		
Are young workers registered for medical care, and covered by accident insurance? Both mills and estates must provide insurance coverage and medical care for all workers. For foreign workers, it is required under the Employment Injury Scheme - Employees' Social Security Act 1969 (Act 4)		
Are young workers being briefed on accident and emergency procedures in a language that they can understand?		
Does each estate and/or mill have accident and emergency procedures to be briefed to young workers, and particularly the newly joined young workers, including telephone contact numbers and details of the appointed first point of contact should an accident happen?		
Does the plantation site ensure mandatory medical check-up for chemical sprayers?		
Do the estates and/or mills identify, assess hazards and risks and determine risk control measures i.e. Hazard Identification, Risk Assessment, and Risk Control) (HIRARC)?		
<b>Covid-19 Preventive &amp; Response Measures</b>		
Are young workers briefed on Covid-19 preventative measures? Are there posters and videos on handwashing technique, social distancing and emergency contacts made available in various languages?		
Provide adequate free supply of clean face masks to be worn during working hours & hand sanitiser.		
Implement the Workers' Minimum Standards of Housing and Amenities (Amendment) Act 2019		
Put in place medical referral mechanism to refer workers who display the Covid-19 symptoms.		
Conduct regular disinfection of common areas in the plantation.		



# Toolkit 2

Risks Relating to Education  
& Child Care



## Toolkit 2: Risks Relating to Education & Child Care

This risk indicator is focused on school-age immigrant children who are at risk of remaining out of school; and children who are discriminated against due to their immigration status and not able to access early childhood care or nursery services in palm oil plantation.

This toolkit provides guidelines on what companies can do to:

- (a) mitigate the risk for children who are out of school, with specific focus on how to provide schooling facilities and child care facilities for children of plantation workers; and
- (b) include criteria in the company's self-assessment in regard to mitigating the risk of children who remain out of school, and parents who are unable to access to early childcare services.

Education has proved critical in the prevention of child labour. Plantation workers face several barriers to ensure that all their children can be enrolled and remain in education. Foreigners, including children of migrant workers, cannot be enrolled in national schools. They face social, protection, legal, economic and educational barriers, for example, lack of documentation, availability of alternative education/schools and having a history of interrupted schooling.

The Roundtable on Sustainable Palm Oil (RSPO) standards require companies to contribute to sustainable community development. Hence, companies play a crucial role to secure these children access to basic education, and to improve the availability of schools and enable better and safe education opportunities for the workers' children.

### What companies can do to support the education of workers' children

- Develop and maintain a register of workers' children, their ages and their schooling status<sup>59</sup>
- Commission service providers such as NGOs to identify school age children not in education, and to assess their needs and support them to access appropriate education options.
- Seek the support of top management to approve budget for the education of workers' children.
- In locations where schools / learning centers are not available or accessible, support the establishment of alternative learning centers/ community learning centers.
- Explore the possibility of enrolling workers' children in other plantation companies' learning centers or jointly establish<sup>60</sup> a Community Learning Centre (CLC)/ Alternative Learning Centre (ALC) with neighboring plantations in the event that companies lack adequate resources or lack adequate number of children to construct new schools.
- Provide free transportation and safe bus services for children to access learning centres or schools located beyond plantation estates.
- Ensure school vehicles can accommodate the number of students to avoid overcrowded buses and that they can all sit safely.
- Provide support to undertake necessary repair work, building of protective walls and fences, addition of classrooms and the provision of school equipment (desks, chairs, whiteboard etc.)
- Include the needs of children with disabilities in the design of education facilities in regard to access (entrance and exit), classroom space, furniture and water and sanitation facilities.
- Provide internet connection for teachers and students to remain in virtual connection through free online platforms when access to schooling is restricted due to pandemic or other factors.
- Provide adequate children's face masks to be worn during school hours.
- Provide adequate supply of hand sanitizer.
- Ensure adequate supply of clean water and electricity in schools.
- Support the establishment<sup>61</sup> of early care and parenting groups, play groups, and kindergarten that has a learning curriculum for children.

\*Please refer to EF's Services for Vulnerable Children for the List of alternative and community learning centres in Sabah<sup>62</sup>

## Self-Assessment

To effectively prevent and mitigate the risk of children who remain out of school and children who are discriminated against and not able to access early childhood care, the steps set out above will take time to implement. To help make this a reality, this self-assessment questionnaire can be used by companies on a quarterly basis to record progress, support the establishment of milestones and to improve business practices.

Assessment Criteria (policies, procedures, processes and measures to address business impact on children)	Result (Y/N/ Partially)	If you don't do this, what are the potential impact on children & young persons? Allocate a Risk Level to each assessment criteria (High <sup>63</sup> , Medium <sup>64</sup> , Low <sup>65</sup> )
In locations where schools/learning centres are not available or accessible for workers' children, is there any support from company to provide basic education for workers' children?		
Is there support to undertake necessary repair work, building of protective walls and fences, addition of classrooms and the provision of school equipment (desks, chairs, whiteboard etc.)		
Does the Human Resources department keep records of the schooling status of workers' children?		
Is there provision of free transportation and safe bus services for children to access to schools/ learning centres located beyond plantation estates?		
Does company work with NGOs to identify out of school children, assess their education needs and support them to access appropriate education?		
In times of Covid-19, does company provide adequate internet services and support for the continuity of education for teachers and students to remain in virtual connection through free online platforms?		
Does company provide adequate face masks for all children?		
Does company ensure adequate hand sanitizer?		
Does company ensure adequate clean water & electricity are provided in schools?		
Does company raise the awareness of Covid-19 amongst children and young people in a child-appropriate manner, including about hygiene and distancing behaviours to prevent the spread of the virus? This could include symptoms and what to do if someone falls ill.		
Support the establishment of early care and parenting groups, play groups, and kindergarten that has a learning curriculum for children.		

59 \*This is to determine who is in schools/ and learning centers and who is not, and to better understand the reasons why some are not in schools

60 Please refer to EF Services for Vulnerable Children in Sabah: What Business & Employees Need to Know for the detailed approaches of how company can provide basic education for workers children, available at <https://www.earthworm.org/uploads/files/Children-in-Plantations-Directory-2019.pdf>

61 As required by the Workers' Minimum Standard of Housing and Amenities Act 1990) (Act 446) (amendment 2019) if there are at least 5 children under the age of 4, company is required to establish a nursery

62 <https://www.earthworm.org/uploads/files/Children-in-Plantations-Directory-2019.pdf>

63 Serious imminent risk to children remain out of school; and children who are discriminated against and not able to access early childhood care or nursery services requiring immediate intervention and/ follow up within a few days

64 Likelihood of serious risk to children remain out of school; and children who are discriminated against and not able to access early childhood care or nursery service requiring urgent scheduled intervention and follow up within 4-6 weeks. Note that cases placed in the medium risk category can move into the high-risk category if intervention does not take place

65 Likelihood of serious risk to children remain out of school; and children who are discriminated against and not able to access to early childhood care or nursery services is low but intervention for specific needs may be required



# Toolkit 3

Risks related to Maternity Protection,  
Healthcare & Nutrition



## Toolkit 3:

### Risks related to Maternity Protection, Healthcare & Nutrition

(This risk indicator is focused on factors that affect female workers who are pregnant and/or breastfeeding mothers.)

This section provides guidelines on measures companies can put in place to:

- (a) mitigate the risk of female workers during pregnancy, child birth and throughout their breastfeeding period;
- (b) provide basic healthcare services for plantation workers and their children who live on plantation sites;
- (c) increase the workers access to affordable and nutritious food for their families; and
- (d) include assessment criteria in the company's self-assessment in regard to mitigating the risks related to maternal protection and healthcare.

#### Maternity Protection

In line with the UNICEF Children's Rights and Business Principles<sup>66</sup> to advance children's rights to health and development through businesses, companies are compelled to ensure that pregnant workers and working mothers are entitled to maternity protection and breastfeeding at the workplace.

#### What can company do to mitigate the risks for female workers during pregnancy, child birth and throughout breastfeeding period?



Develop a company policy to prohibit discrimination related to pregnancy in:

- Refusing to hire
- Adverse differential treatment (e.g. wage status)
- Termination of employment
- Harassment



Provide once a month medical check-up for workers, especially for female workers. At a minimum, workers should have blood pressure, skin and eye check-ups.



Provide free pregnancy tests at the request of workers, whenever there is indication of pregnancy.



Upon confirmation by a doctor that a worker is pregnant, transfer pregnant workers to do lighter tasks and ensure she refrains from handling chemicals throughout her pregnancy, after childbirth and throughout the breastfeeding period.



Management should ensure that while the worker is rotated to non-hazardous roles, she continues to earn her full wage in line with minimum wage regulations.



Ensure that pregnant workers receive access to free vaccinations that are required by the Ministry of Health.



As constituted in the Employment Act 1955, the Sarawak Labour Ordinance, and the Sabah Labour Ordinance, every female employee is entitled to paid maternity leave for the period of not less than 60 days. Company needs to provide maternity leave for their workers.



Provide basic breastfeeding facilities in plantation estates with the necessary equipment and facilities, including: hand washing basin, refrigerator/ice-box, electrical outlets for breast pumps and a small table with comfortable seats.

<sup>66</sup> [https://www.unicef.org/corporate\\_partners/index\\_25078.html](https://www.unicef.org/corporate_partners/index_25078.html)

## Self-Assessment

To effectively prevent and mitigate the risk faced by female workers who are pregnant and breastfeeding mothers who work on plantations sites, the steps set out above will take time to implement. To help make this a reality, this self-assessment questionnaire can be used on a quarterly basis to record progress, support the establishment of milestones and to improve business practices.

<b>Pregnant Female Workers &amp; Breastfeeding Mothers (To Be Free from Chemical Exposure)</b>		
<b>Assessment Criteria (policies, procedures, processes and measures to address business impact on children)</b>	<b>Result (Y/N/ Partially)</b>	<b>If you don't do this, what are the potential impact on children &amp; young persons? Allocate a Risk Level to each assessment criteria (High<sup>67</sup>, Medium<sup>68</sup>, Low<sup>69</sup>)</b>
Does company have a policy to protect pregnant women workers from being discriminated against?		
Does company allow pregnant workers to be transferred to light work tasks to prevent workers from being exposed to chemicals?		
Does company provide regular check-ups for pregnant workers who have had contact with chemicals?		
Does the company ensure pregnant workers receive free vaccinations?		
Does company provide maternity leave for workers who have given birth?		
Does the company guarantee that breastfeeding women are not exposed to hazardous chemicals and materials?		

<sup>67</sup> Serious imminent risk to discrimination at work/ poor maternal health/foetal health/ child health requiring immediate intervention and/ follow up within a few days

<sup>68</sup> Likelihood of serious risk to discrimination at work/poor maternal health/foetal health/ child health requiring urgent scheduled intervention and follow up within 4-6 weeks. Note that cases placed in the medium risk category can move into the high-risk category if intervention does not take place

<sup>69</sup> Likelihood of serious risk to discrimination at work/poor maternal health/foetal health/child health is low but intervention for specific needs may be required

## Healthcare and Nutrition

How can companies provide basic healthcare services for plantation workers and their children who live on plantation sites, and what actions can company take to increase the workers access to affordable and nutritious food for their families?

<b>HealthCare</b>	
✓	As outlined in the Workers' Minimum Standard of Housing and Amenities Act 1990 (446), estate management should construct at least a clinic that provides medical facilities, paramedics, doctors and ambulances
✓	Arrange for a registered medical practitioner to visit the clinic at least once a fortnight, as required by the law to supervise the operations and management of the clinic and to provide medical treatment to workers and their dependants.
✓	Provide free vaccinations to workers and their family members, as required by the Workers Minimum Standards of Housing and Amenities 1990 (446) to protect them from infectious disease.

✓	Companies should ensure there is a provision of an ambulance/ transportation to send workers to the nearest government hospital, in cases where the medical officer requires the sick patient to receive hospital treatment.  *Companies need to realise that for undocumented migrants-they face challenges to access to assistance such as medical care, and every effort is needed in order to facilitate their access to treatment without discrimination, and to protect them from being arrested and detained when doing so
✓	Provide health insurance coverage so that women workers can access medical care during their pre and post-natal phases easily.
Nutrition	
✓	Allow sundry shops to be established in the estates / mills compound to ensure access to food.
✓	Establish canteen for workers.
✓	Ensure shops / canteens submit their price list of goods / food to the management for verification they match or are below market prices and ensure that prices of goods are clearly displayed.
✓	Allow food vendors to enter plantation compound to sell fresh and healthy food to workers and their families.
✓	Depending on the budget of the company, company can provide rice allowance or meal allowance for their workers.

## Self-Assessment

To effectively provide basic healthcare services and to increase the workers access to affordable and nutritious food for their families, the steps set out above will take time to implement. To help make this a reality, this self-assessment questionnaire can be used by companies on a quarterly basis to record progress, support the establishment of milestones and to improve business practices

HealthCare		
Assessment Criteria (policies, procedures, processes and measures to address business impact on children)	Result (Y/N/ Partially)	If you don't do this, what are the potential impact on children & young persons? Allocate a Risk Level to each assessment criteria (High <sup>70</sup> , Medium <sup>71</sup> , Low <sup>72</sup> )
In locations where there are no local healthcare facilities, does the company provide healthcare services on plantation sites?		
Are workers and their families given access to immunisation against any infectious diseases?		

70 Serious imminent risk to illness requiring immediate intervention and/ follow up within a few days

71 Likelihood of serious risk to illness requiring urgent scheduled intervention and follow up within 4-6 weeks. Note that cases placed in the medium risk category can move into the high-risk category if intervention does not take place

72 Likelihood of serious risk to illness is low but intervention for specific needs may be required

Are the medical care services accessible by all workers (including temporary workers and migrant workers) and their dependants on-site?		
In emergency cases, is there reliable transportation provided for workers and their families to be transported to the nearest government hospital?		
<b>Nutrition</b>		
<b>Assessment Criteria ((policies, procedures, processes and measures to address business impact on children)</b>	<b>Result (Y/N/ Partially)</b>	<b>If you don't do this, what are the potential impact on children &amp; young persons? Allocate a Risk Level to each assessment criteria (High<sup>73</sup>, Medium<sup>74</sup>, Low<sup>75</sup>)</b>
Do workers and their families have easy access to adequate, affordable and nutritious food?		
Are the prices of sundry goods sold at the shops on sites fair and being monitored by company?		

73 Serious imminent risk to malnutrition requiring immediate intervention and/ follow up within a few days

74 Likelihood of serious risk to malnutrition requiring urgent scheduled intervention and follow up within 4-6 weeks. Note that cases placed in the medium risk category can move into the high-risk category if intervention does not take place

75 Likelihood of serious risk to malnutrition is low but intervention for specific needs may be required



# Toolkit 4

Risks Related to Birth Registration



## Toolkit 4: Risks Related to Birth Registration

(This risk indicator is focused on children who are at risk of not having legal proof of identity, and therefore are left uncounted and invisible.)

This toolkit provides guidance on what companies can do to:

- (a) Assist their workers to obtain birth registration for their children to reduce the risk of children becoming stateless and missing out on receiving social assistance, attending schools, and healthcare services; and
- (b) Include assessment criteria in the company's self-assessment in regard to risk mitigation.



### What is Birth Registration?

Birth registration is a process of declaring (of birth), recording (of information) and producing a certificate within a civil registry of the occurrence and characteristics of birth, in accordance with the national or state legal requirement. In Sabah, all births can be registered in any National Registration Department (NRD) office. For Malaysian nationals, they are issued with a "green" birth certificate, and a "red" birth certificate for non-Malaysian including undocumented immigrant children.



### Current Challenges

Local communities, workers in rural areas and immigrants are often unaware of the importance of birth registration in Malaysia and notifying their foreign consulates. As such, many local and migrant workers' children in rural areas lack legal identity documents.

Some of the key reasons that may hinder birth registration in rural areas are:

- Administrative barriers;
- Difficulty in accessing registration offices due to cost of travel to and from these remote locations;
- High illiteracy among the parents; and
- Lack of awareness among parents on the importance of securing a birth certificate



### Why is Birth Registration needed?

Birth registration is the first form of legal documentation and gives legal identity. Needless to say, the lack of a birth certificate leads to many deprivations and can place the child at risk of exploitation. Birth registration is a fundamental human right for all children, regardless of their status of nationality and ethnicity.

### What a Company can do to help workers' children to obtain birth registration?



Obtain birth registration forms from the local National Registration Department (NRD).



Distribute birth registration forms to all workers with children and/or whose wives are pregnant.

- Establish partnerships with service providers such as the NGO Good Shepherds to conduct sessions with workers on the importance of birth registration and how to register the birth of their children.
- Assist workers to fill out birth registration forms and to submit forms to the consulates/ or National Registration Department (NRD).
- Company to collect all completed birth registration forms and supporting documents from workers (parents).
- Company to extend an invitation letter to the consulates in Sabah to set up an appointment to visit the company.
- Establish good working relationship with service providers to facilitate birth registration process.

## Self-Assessment

To effectively prevent and mitigate the risk of children not having a legal identity, the steps set out above will take time to implement. To help make this a reality, this self-assessment questionnaire can be used by companies on a quarterly basis to record progress, support the establishment of milestones and to improve business practices.

Assessment Criteria (policies, procedures, processes and measures to address business impact on children)	Result (Y/N/ Partially)	If you don't do this, what are the potential impact on children & young persons? Allocate a Risk Level to each assessment criteria (High <sup>76</sup> , Medium <sup>77</sup> , Low <sup>78</sup> )
Does the company have a policy to assist workers' children to obtain birth registration?		
Does company have an awareness-raising programme for their staff and workers on the importance of birth registration?		
Does company brief workers on the steps they need to take to help their children to acquire birth registration?		
Does company engage partners to facilitate in birth registration programmes for their workers' children, which include non-migrant children?		
Has company established a working relationship with consulates and embassies to help register their migrant workers' children?		

<sup>76</sup> Serious imminent risk to children not having a legal identity and thus cannot access to basic services- requiring immediate intervention and/ follow up within a few days

<sup>77</sup> Likelihood of serious risk to children not having a legal identity and thus cannot access to basic services- requiring urgent scheduled intervention and follow up within 4-6 weeks. Note that cases placed in the medium risk category can move into the high-risk category if intervention does not take place

<sup>78</sup> Likelihood of serious risk to not having a legal identity and thus cannot access to basic services is low but intervention for specific needs may be required



# Toolkit 5

Risks Related to Child Protection



## Toolkit 5: Risks Related to Child Protection

(This risk is focused on children at risk of sexual exploitation, violence and abuse on plantation sites.)

This section provides guidelines on what companies can do to:

- (a) prevent risks of child sexual exploitation, violence and abuse;
- (b) provide remedy if sexual exploitation, violence and abuse is found; and
- (c) include assessment criteria in the company's self-assessment in regard to the prevention of child sexual violence, abuse and exploitation.

### Child Sexual Exploitation, Violence and Abuse in Palm Oil Plantations

Child Sexual Exploitation is considered as one of the worst forms of child labour, according to the ILO Convention 1999 (No182)<sup>79</sup>. Recently, the US Border and Customs Border Protection cited sexual and physical violence as one of the factors that blocked the import of palm oil made by a Malaysian producer. The United Nations Conventions of the Rights of the Child<sup>80</sup> (UNCRC) provides a solid legal framework for protecting children against all forms of abuse, including sexual abuse and exploitation.

The three primary laws that uphold child rights—specifically rights related to child protection in Malaysia are:

- Domestic Violence Act 1994<sup>81</sup>
- Child Act 2001
- Sexual Offences Against Child Act 2019

Tackling sexual exploitation, violence and abuse against children and young workers who work or live on plantation sites, should be a top priority for companies. In dealing with child survivors of sexual exploitation and abuse, the best interest of the child and the principle of “Do No Harm” should guide any intervention and decision. When a decision or intervention is made about a child's situation, it must ensure the end goal is to protect the security and safety, the well-being and development of the child. Every effort must be made to prevent and to minimise harmful consequences.

Companies are strongly advised to seek assistance from child protection experts and/or third-party organisations that have established experience in (a) addressing sexual violence and abuse, and (b) direct experience working with children survivors of violence.



Special consideration and care should be taken when providing remedy to child survivors. The ethical aspect to ensure the availability of at least basic care and support services to which a child survivor may be referred is important.

Companies need to realise that for undocumented migrants, particularly women and children survivors of violence, face challenges to access to assistance such as medical care, and every effort is needed in order to facilitate their access to treatment without discrimination, and to protect them from being arrested and detained when doing so. Access to affordable and professional healthcare is critically important for survivors. Without it, they face risks such as pregnancy complications, pregnancy-related death and sexually transmitted disease.



**Important Resource for Companies!:** [How to Support Survivors of Gender-based Violence \(GBV\) when a GBV Actor is not available in your area](#)

# How Can a Company Help Prevent Child Sexual Exploitation, Violence and Abuse?

## 1. Make A Commitment of Zero Tolerance against Child Sexual Exploitation, Violence & Abuse

- Develop a policy statement against Child Sexual Exploitation, Violence & Abuse
- \*The policy should clearly state that exchange of money, employment, goods, or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour is prohibited.
- Top Management to sign off policy statement.
- Establish partnerships with third party organisations<sup>82</sup> to provide technical support & advice in the prevention of Child Sexual Exploitation and Abuse (CSEA).
- Distribute a copy of the policy to all employees, workers, third-party suppliers and contractors.
- Develop an anonymous whistle-blower channel.
- Brief employees about the whistleblower policy and reassure them that no action will be taken against any worker who makes such an allegation in good faith.
- Develop a list of service providers that provide medical, shelter, psycho-social supports for child survivors of sexual violence and abuse.

## 2. Communicating Policy

- Brief employees, workers, third-party suppliers and contractors on the standards of conduct, reporting procedures, disciplinary actions when policy is violated.
- Develop user-friendly info-graphics and communication materials the company's commitment against Child Sexual Exploitation and Abuse.
- Display materials such as posters in conspicuous places such as the public notice boards, on the walls, waiting areas, canteens etc. where they are easily visible to all workers and to outsiders.

## 3. Establish an ethical grievance mechanism that is centered on “Do No Harm” approach

- Develop a mechanism<sup>83</sup> that outlines clear grievance procedures on how to receive complaints/ investigate cases and to develop responses.  
Please refer to page 38 for further details.
- Develop an Internal Complaint Mechanism for Receiving and Reviewing Sexual Exploitation, Violence and Abuse (CSEA)
- Incorporate a provision in the contractual agreement with third-party suppliers that all relevant information relating to CSEA is shared in a confidential and need-to-know basis.

79 [https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0:NO:P12100\\_ILO\\_CODE:C182](https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0:NO:P12100_ILO_CODE:C182)

80 [http://www.unicef.org.uk/wp-content/uploads/2010/05/UNCRC\\_united\\_nations\\_convention\\_on\\_the\\_rights\\_of\\_the\\_child.pdf](http://www.unicef.org.uk/wp-content/uploads/2010/05/UNCRC_united_nations_convention_on_the_rights_of_the_child.pdf)

81 The Domestic Violence Act 1994 (DVA) was passed in 1994 and implemented in 1996, sending a clear message that domestic violence is not just a family matter, but a crime. The DVA is read in conjunction with the Penal Code and the Criminal Procedure Code. The DVA criminalises multiple forms of violence—from physical abuse, to sexual abuse, to psychological abuse—perpetrated by family members, and allows individuals experiencing such abuse, whether at the hands of a spouse or a family member, to access protection.

82 Sabah Women's Action Resource Group (SAWO), Women's Aid Organisation (WAO), Women's Centre for Change (WCC)

83 This formal mechanism should allow workers to seek remedy without fear including mechanism to report abuse, exploitation anonymously, taking into consideration language barriers

- ✓ A main contact person to be appointed to work with human resources to work with survivors of exploitation, and abuse.
- ✓ Facilitate survivors to receive free medical treatment without discrimination, and for undocumented migrant children extra effort needs to be taken protect them from being arrested and detained when receiving such treatment. Ensure the physical safety of the survivor. If need be, work with third party organisation to provide temporary safe shelter for survivor if she/he is in danger.

4. Recruitment and vetting

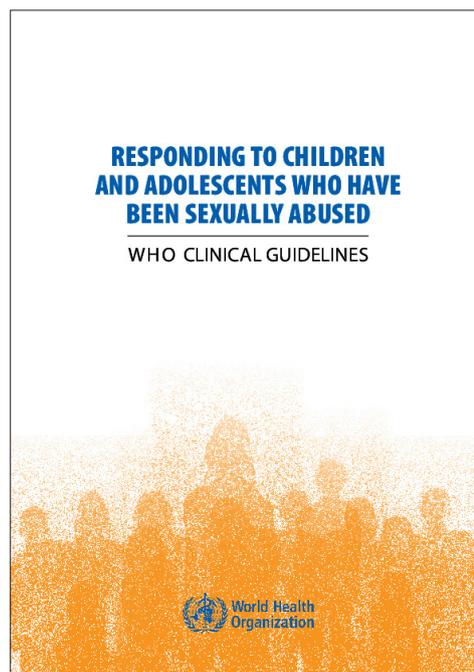
- ✓ Human resources department to develop a vetting mechanism to run criminal background checks on prospective employees.

5. Organise Annual Training for All Employees and Workers, on Child Sexual Exploitation and Abuse & Reporting Procedures

- ✓ Organise awareness raising sessions at least twice a year to increase employees and workers understanding about the laws governing Sexual Offences against Child Act 2019, Child Act 2001, and what does sexual exploitation look like, and how to report CSEA involving Company and third-party suppliers' personnel.
- ✓ Human Resources to ensure all mandur/ supervisor, workers' welfare focal points, estate managers, mill workers, plantation workers attend the training.
- ✓ Develop training records to document training attendance and training materials.
- ✓ Develop training module to include topics such as how to recognise CSEA; negative consequences of child sexual exploitation, violence and abuse, if found in business or supply chains; and how it can negatively affect an individual child and their families.

**Important Resource for Companies:**

How To Respond to Children and Adolescents Who Have Been Sexually Abused



6. Mandate new employees, workers to attend a compulsory training/ on-boarding session on child safeguarding principles and prevention of CSEA

- ✓ Ensure company's new recruit employees and workers are trained in the company's CSEA policy.
- ✓ Company to articulate the expectation of its new recruits, including third-party suppliers and contractors.
- ✓ Company to ask their third-party suppliers to share their policies on CSEA; describes mitigating steps that the company will take to address CSEA.

7. Third-party supplier engagement: prevention of Child Sexual Exploitation, Violence and Abuse in contractual clauses

-  Incorporate a paragraph or clause on CSEA in contracts with third-party suppliers, and contractors and outline the legal consequences if the contracting party violates the provision and ensure their accountability.
-  Establish partnership with third party organisations to address the psycho-social, medical needs, and safe shelter for survivors.
-  Ensure that a copy of company's policy on CSEA will accompany all third-party suppliers contracts and discussions held with partners to further embed understanding and compliance.

## How to Provide Remedy to Child Survivor of Sexual Exploitation, Violence and Abuse

All responses should be guided by the principles of Safety of Survivor/ and Complainant, Confidentiality, Respect, Best Interest of the Child, Consent, Survivor's Right to Information, Survivors Rights to Access Assistance

<b>STEP 1</b>	A child sexual exploitation, violence/abuse incident related to your company is disclosed
<b>STEP 2</b> (immediately)	<p><b>Company policies may require reporting of the abuse to the top management- to ensure organisational accountability and to ensure that personnel do not abuse.</b></p> <p><b>In this context, immediately,</b> the survivor/complainant allegation must be reported to the estate manager and to the human resources department at the headquarters level. These requirements need to be explained to child survivor/caregiver at the beginning, prior to proceeding with case management and service referral, when mandatory reporting is discussed during the process to obtain informed consent.</p>
<b>STEP 3</b>	Ensure the physical and emotional safety of the child survivor throughout all interactions with him/her. If the survivor discloses, she/he is in danger from immediate family or people they are living with, inform the child that you need to work with third-party organisation such as service providers on how to ensure the child's safety.
<b>STEP 4</b>	As company personnel may not be trained on how to deal with child survivors of sexual exploitation, violence and abuse, it is strongly suggested that company reach out to child protection specialist, service providers <sup>84</sup> with relevant expertise to explain to the child survivor the duty to report certain incidents in accordance with company policies, to explain the reporting mechanism to the survivor and what they can expect after the report is made; how they can be supported and to interview the survivor. Please refer to annex 1 for the list of service providers.
<b>STEP 5</b>	The service provider or child protection specialist is to sign a Non-Disclosure Agreement (NDA) with the company to ensure confidentiality.
<b>STEP 6</b>	<p>Phase 1: This service provider/ child protection specialist, would be required to gather information such as:</p> <ul style="list-style-type: none"> <li>• Survivor's details, health status, family background</li> <li>• Place, date and time of incident</li> <li>• Details of perpetrators</li> <li>• Awareness of survivors' family in relation to survivor being abused</li> <li>• Survivor's view of her/his security (safety assessment)</li> <li>• Survivor health needs assessment- The urgency of medical referrals is determined by the presence of injuries and/or complaints of pain and/or the timing of the assault and/or nature of the assault and/or for evidence collection. If the last incident was within 120 hours and/or the <u>child is injured/experiencing physical pain, the child should be immediately referred for emergency medical treatment.</u> If the child is physically free of injury and pain, the sexual assault occurred more than 120 hours prior, and the nature of the assault did not include physical violence, touching or penetration, a medical referral may be necessary but not urgent<sup>85</sup>.</li> </ul>

<sup>84</sup> Women's Aid Organisations (WAO) in Peninsular Malaysia at <https://wao.org.my/>; Sabah Women's Action Resource Group (SAWO) in Sabah at <http://www.sawo.org.my/where-to-find-us.html>; Sarawak Women for Women at <https://sarawwws.org/about-us/>; All Women's Action for Society in Peninsular Malaysia (AWAM) at <https://www.awam.org.my/>

<sup>85</sup> Cited the Caring for Child Survivors of Sexual Abuse, IRC & UNICEF, 2010 available at <https://www.unicef.org/media/73591/file/IRC-CSS-Guide-2012.pdf.pdf>

	<p>Precaution: Companies need to realise that for <u>undocumented migrants, particularly women and children survivors of violence</u> face challenges to access to assistance such as medical care, and <u>every effort is needed in order to facilitate their access to free medical treatment without discrimination, and to protect them from being arrested and detained by local authorities when doing so.</u></p> <ul style="list-style-type: none"> <li>• Contact number of a person, whom the survivor trust, if any</li> <li>• Needs assessment of the survivor's</li> <li>• Provide recommendation that is of best interest to the survivor</li> </ul>
<b>STEP 7</b>	<p>This information will only be shared with the focal point of the company who is assigned to handle this case. The focal point is to protect the identity and safety of the survivor by <u>not disclosing personal identifying information</u> such as their names, their photos, their home address, location where they live and schools that they attend; ensure that the survivor's voice is not recorded; only share only non-identifying information with the team in an effort to protect the child survivor.</p>
<b>STEP 8</b>	<p>For a child whose age is 15 and above, generally, they are mature enough to understand their experience and make their own decisions.</p> <ul style="list-style-type: none"> <li>• Ask the child if they have someone (identified adult) whom they trust for on-going support and provide information on available services and how to access to these services.</li> <li>• Ask the survivor's permission if they would like to be linked to the identified service providers.</li> <li>• If the survivor says yes, ask for permission to share any information about the child/adolescent their experience. Tell the survivor who you want to talk to, why you want to talk to them and what information you want to share.</li> <li>• Inform the survivor of the benefits and the potential and risks<sup>86</sup> of seeking assistance.</li> <li>• Do not force the child if she/he says no.</li> <li>• Facilitate a confidential and safe referral of the child to a credible service provider/ child protection specialist</li> </ul> <p>For a child whose age is between below 14 years old, they may or may not be able to self-report, and make decisions on their own.</p> <ul style="list-style-type: none"> <li>• Ask the survivor, if there is someone she/he trust (identified adult) to go for support and provide information on available service and how to access these services.</li> <li>• Ask the identified adult (if the survivor is unable to decide because of the level of maturity) if they would like to be linked to the identified service providers.</li> <li>• If the answer is yes, ask for permission to share any information about the child/adolescent or their experience. Tell the survivor who you want to talk to, why you want to talk to them and what information you want to share</li> <li>• Inform the identified adult and survivor of the benefits and the potential risks<sup>87</sup> of seeking assistance.</li> <li>• Do not force the child if she/he says no.</li> <li>• Facilitate a confidential and safe referral of the child to a credible service provider/ child protection specialist.</li> </ul>
<b>STEP 9</b>	<p>Company is to reach out to the identified service providers/ third-party organisations if the child wants to receive support from third-party organisations/ service providers.</p>
<b>STEP 10</b>	<p>Child survivor should not be sent to referral agencies alone, unless they are adolescents and there is good reason to do so. Generally, children should be accompanied by their caregivers, and if appropriate, their caseworkers.</p>
<b>STEP 11</b>	<p>Company to schedule a case follow up meeting with the service providers to regularly monitor the well-being of the child survivor.</p>

<sup>86</sup> The risk of seeking care is that the services may not exist or may be of poor quality; the service providers may be insensitive or cause harm; the survivor's confidentiality will be broken exposing them to more harms, among other concerns.

<sup>87</sup> The risk of seeking care is that the services may not exist or may be of poor quality; the service providers may be insensitive or cause harm; the survivor's confidentiality will be broken exposing them to more harms, among other concerns.

## Self-Assessment

To effectively prevent and mitigate the risk of child sexual exploitation and abuse on plantation sites, the steps set out above will take time to implement. To help make this a reality, this self-assessment questionnaire can be used by companies on a quarterly basis to record progress, support the establishment of milestones and to improve business practices.

Assessment Criteria (policies, procedures, processes and measures to address business impact on children)	Result (Y/N/ Partially)	If you don't do this, what are the potential impact on children & young persons? Allocate a Risk Level to each assessment criteria (High <sup>88</sup> , Medium <sup>89</sup> , Low <sup>90</sup> )
Is there a written policy on Zero Tolerance against Child Sexual Exploitation and Abuse-signed off by the top management?		
Is there a policy that clearly states the standards of conducts expected of its employees, workers, third-party suppliers and contractors, reporting procedures, disciplinary actions when employees, workers, third-party suppliers and contractors violate the policy?		
Prevention of Child Sexual Exploitation and Abuse contractual clauses to outline the legal consequences if the contracting third-party suppliers and contractors violates the provision?		
Is there a recruitment and vetting process put in place avoid the re-recruitment of past Sexual Exploitation and Abuse perpetrators?		
Is there an annual Training for All Employees, Workers, Contractors and Third-party suppliers on Child Sexual Exploitation and Abuse & Reporting Procedures?		
Is there a list of service providers that provide medical, psycho-social, shelter for child survivors of sexual violence and abuse?		
Does company mandate New Employees, Workers, Third-party suppliers and Contractors to Attend A Compulsory Training/ On-boarding session on Prevention on Child Sexual Exploitation and Abuse?		
Does company disseminate CSEA policies to all employees, workers, third-party suppliers and contractors in languages that are understandable to them?		

Does company have a whistle-blower policy to protect people who report against CSEA?		
Does third-party supplier partner due diligence process include assessment on CSEA?		
<b>Assessment Questions to Identify Gap in the Provision of Remedy to Child Survivor of Sexual Exploitation &amp; Abuse</b>		
<b>Assessment Criteria (policies, procedures, processes and measures to address business impact on children)</b>	<b>Result (Y/N/ Partially)</b>	<b>If you don't do this, what are the potential impact on children &amp; young persons? Allocate a Risk Level to each assessment criteria (High<sup>91</sup>, Medium<sup>92</sup>, Low<sup>93</sup>)</b>
Is there an Internal Complaint Mechanism for Receiving and Reviewing Sexual Abuse and Exploitation?		
Is there training provided to workers' welfare main contact/gender contact/ estate plantation managers on how to report child sexual exploitation/ abuse cases if cases are to be found in plantation areas?		
Is there training provided to all young workers to be aware about the laws governing Sexual Offences against Child Act 2019, Child Act 2001, and what does sexual exploitation look like, and how to report Child Sexual Exploitation and Abuse Involving Company and third-party suppliers' personnel?		
Has company established a partnership with third-party service providers organisations such as NGOs to provide services to young workers, should they be found to be survivors of sexual exploitation?		

88 Serious imminent risk to personal safety/ physical health/ psychological impact/ social isolation & marginalisation requiring immediate intervention and/ follow up within a day or two

89 Likelihood of serious risk to personal safety/physical health/psychological impact/social isolation & marginalisation requiring urgent scheduled intervention and follow up within 4-6 weeks. Note that cases placed in the medium risk category can move into the high-risk category if intervention does not take place

90 Likelihood of serious risk to personal safety/physical health/ psychological impact/social isolation & marginalisation is low but intervention for specific needs may be required

91 Serious imminent risk to personal safety requiring immediate intervention and/ follow up within a few days

92 Likelihood of serious risk to personal safety requiring urgent scheduled intervention and follow up within 4-6 weeks. Note that cases placed in the medium risk category can move into the high-risk category if intervention does not take place

93 Likelihood of serious risk to personal safety is low but intervention for specific needs may be required



# Toolkit 6

Risks Related to Onsite Safety,  
Accommodation,  
Water & Sanitation



## Toolkit 6:

# Risks Related to Onsite Safety, Accommodation, Water & Sanitation

**On Site Safety** (This considers the risks to children in situations where they stray into palm oil plantation sites or go there to play.)

**Accommodation, Water & Sanitation** (This considers the indirect health risks that children might face when they do not have a safe and decent living space on plantation sites/ in surrounding areas.)

This section provides guidelines on what companies can do to:

- (a) Prevent risk of child injury;
- (b) Mitigate the indirect risks of child ill health by enhancing access to clean water and sanitation and decent quality condition of housing; and
- (c) Include assessment criteria in the company' self-assessment to reduce the aforementioned risks.

Companies are responsible for ensuring, as far as practicable, the safety and health of visitors, including children on plantation sites. Workers on plantation sites are also required to work safely so people are not harmed. Workplace safety and health planning should address situations where children may:

- be visiting or accompanying their parents; and/or;
- live in close proximity in the surrounding areas;

## What A Company Can Do to Mitigate On-Site Safety Risk

### 1. Develop a workplace policy on children onsite safety

- Develop clear safety rules that every worker knows and follows on the entry of children into plantation sites and mills and their access to parts of it.
- Communicate instructions to all workers on safe work procedures where there maybe children
- Communicate the rules to all at the plantation sites/ mills including supervisors/mandurs, workers and children
- Communicate instructions to workers who are parents/ guardians on necessary supervision of children to ensure safety on plantation sites and mills
- Make a list of emergency numbers to keep near the telephone i.e. hospital, police, fire-brigade

### 2. Control access and movement

- Install physical barriers such as gates, guards and fences to prohibit children from entering hazardous areas

- Make it compulsory for all workers to return their tools to the store after use and not to be brought home
- Put in place a surveillance system to ensure rules are followed e.g. using high level supervision to prevent children's access to certain areas
- Put up clear warning signs near dangerous sites? Ex: Pond, lake, chemical storage areas, wild animals.
- In situations where the plantation sites are in close proximity to the housing areas, set up a safe play playground for children

### 3. Conduct socialisation sessions for children

- Organise an awareness raising session for children to inform them:
  - Which areas and equipments are out of bound
  - Banned activities such as riding on tractors etc

## Self-Assessment

To effectively prevent and mitigate the risk of child safety on plantation sites, the steps set out above will take time to implement. To help make this a reality, this self-assessment questionnaire can be used by companies on a quarterly basis to record progress, support the establishment of milestones and to improve business practices.

Assessment Criteria (policies, procedures, processes and measures to address business impact on children)	Result (Y/N/ Partially)	If you don't do this, what are the potential impact on children & young persons? Allocate a Risk Level to each assessment criteria (High <sup>94</sup> , Medium <sup>95</sup> , Low <sup>96</sup> )
Is there a written policy for on-site safety for children that is signed off by top management?		
Is there a briefing session to communicate with all employees and all workers on clear safety rules concerning the access of children to plantation sites/ mills?		
Is there a communication session organised to workers who are parents/ guardians on necessary supervision of children to ensure safety on plantation sites and mills?		
Is there a list of emergency numbers compiled by the estate office?		
Are there clear warning signs on plantation areas/ and in mills?		

Are hazardous areas securely fenced or locked to prevent children from entering?		
Is there a surveillance system put in place to monitor the movement of children from entering into dangerous and hazardous areas?		
Do you conduct regular awareness sessions for children to inform them what are allowed and not allowed on plantation sites?		
Is there special storage allocated for workers to keep their equipment after used-to prevent them from bringing the equipment back to their house?		

## What A Company Can Do to Improve the Living Conditions of Children?

### 1. Provide each worker and their family a free housing unit

- Refer to the Workers' Minimum Standards of Housing & Amenities Amendment Acts (446) 2019 to ensure compliance on foreign workers housing standards
- Provide free adequate safe and clean water for drinking, cooking, personal hygiene and for laundry, handwashing
- Provide free electricity supply for all housing units
- Provide free adequate supply of soaps for each family
- Ensure proper sewage and rainwater drainage system are constructed in housing areas
- Provide playground and recreational facilities

### 2. Organise Awareness Raising Sessions for Workers and their Families on the Importance of Hygiene

- Organise awareness raising sessions regular for all workers, their families and children on hygiene education and handwashing

## Self-Assessment

To effectively prevent and mitigate the risk of indirect health risks that children might face when they do not have a safe and decent living space on plantation sites/ in surrounding areas), the steps set out above will take time to implement. To help make this a reality, this self-assessment questionnaire can be used by companies on a quarterly basis to record progress, support the establishment of milestones and to improve business practices

Assessment Criteria (policies, procedures, processes and measures to address business impact on children)	Result (Y/N/ Partially)	If you don't do this, what are the potential impact on children & young persons? Allocate a Risk Level to each assessment criteria (High <sup>97</sup> , Medium <sup>98</sup> , Low <sup>99</sup> )
Has company upgraded the housing facilities for migrant workers based on Workers' Minimum Standards of Housing & Amenities Amendment Acts (446) 2019?		
Are housing units equipped with clean and safe drinking water?		
Are the housing units equipped with adequate electricity supply?		
Does company provide soaps for each housing units?		
Are housing units adequately equipped with domestic sewage system and rainwater drainage system?		
Does the company raise the awareness on the importance of hygiene to its workers and their families?		

94 Serious imminent risk to personal & physical safety requiring immediate intervention and/ follow up within a few days

95 Likelihood of serious risk to personal & physical safety requiring urgent scheduled intervention and follow up within 4-6 weeks. Note that cases placed in the medium risk category can move into the high-risk category if intervention does not take place

96 Likelihood of serious risk to personal & physical safety is low but intervention for specific needs may be required

97 Serious imminent risk to ill health requiring immediate intervention and/ follow up within a few days

98 Likelihood of serious risk to ill health requiring urgent scheduled intervention and follow up within 4-6 weeks. Note that cases placed in the medium risk category can move into the high-risk category if intervention does not take place

99 Likelihood of serious risk to ill health is low but intervention for specific needs may be required

# Annex 1

List of service providers that focus on providing support to survivors of sexual violence and abuse

Organisation	Location	Contact Number	Website
Women's Aid Organisation (WAO)	P.O.Box 493 Jalan Sultan 46760 Petaling Jaya, Selangor	+603 7956 3488 (hotline)  +603 7957 5636 / 0636	<a href="https://wao.org.my/">https://wao.org.my/</a>
All Women's Action Society (AWAM)	No. 85, Jalan 21/1, Taman Paramount, 46300 Petaling Jaya, Selangor	+603-7877 4221	<a href="https://www.awam.org.my/">https://www.awam.org.my/</a>
Sabah's Women's Action-Resource Group (SAWO)	Lot 24, 2nd Floor, Block C, Damai Point 88300 Kota Kinabalu W.D.T. 14, Sabah, 88860 Kota Kinabalu	+6088 269 291	<a href="http://www.sawo.org.my/">http://www.sawo.org.my/</a>
Sabah Law Society	Menara MAA, Lorong Api-Api 1, 88000, Kota Kinabalu, Sabah	+6088-232662	<a href="https://www.sabahlawsociety.org/y">https://www.sabahlawsociety.org/y</a>
Sarawak Women for Women Society	2nd Floor, No. 1610, Jalan Rock, 93200 Kuching, Sarawak	+6082-416 053	<a href="https://sarswws.org/">https://sarswws.org/</a>
Tenaganita	12, Jalan 6/11 46000 Petaling Jaya Selangor Darul Ehsan, Malaysia	Hotline  +6012 335 0512 +6012 339 5350	<a href="http://www.tenaganita.net/">http://www.tenaganita.net/</a>
Women Centre for Change (WCC)	241 Jalan Burma, 10350 Penang	+604-228 0342 or +6011-3108 4001	<a href="https://www.wccpenang.org/">https://www.wccpenang.org/</a>



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