



2025

Feasibility Study

for a Child-Friendly Grievance Mechanism in Ghana



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Definitions

Grievance mechanism

Grievance mechanisms are processes for receiving, investigating, and addressing complaints or concerns about potential or actual adverse human rights impacts.

Operational grievance mechanism

A grievance mechanism is designed to receive and address concerns from individuals or communities who may be impacted by operational activities. Operational-level grievance mechanisms enable grievances to be raised early and remediated directly.

Access to remedy

Access to remedy means that individuals and communities whose human rights are harmed by business activities can seek and obtain redress through legitimate, transparent, and effective grievance mechanisms, whether state-based or non-state-based.

Children

All persons under the age of 18 years.

Rights-holders

Individuals or groups whose human rights may be impacted by operational activities.

Duty-bearers

States that have the obligation to protect, and businesses and other actors that have the responsibility to respect and fulfil the human rights of individuals (rights-holders).

Child protection

Child protection refers to preventing and responding to violence, exploitation, abuse and neglect of children.

1. Introduction

The International Cocoa Initiative commissioned Partner Africa to undertake a feasibility study on implementing a child-friendly grievance mechanism in Ghana.

The study aimed to understand the feasibility of a child-friendly grievance mechanism in Ghana and explore conditions for success through a series of workshops and interviews, drawing on examples from other industries and aligning with the UNGPs' 7 effectiveness criteria. The study should also be seen in a context where considerable work has been done on child labour in West Africa, by organisations such as the ICI investing in creating awareness of the risks of child labour in cocoa-growing communities and working with communities and individuals to remediate child labour.¹

In most global supply chains, children face numerous challenges in accessing channels to raise their voices. Even though children are some of the most vulnerable people in global supply chains, alongside migrant workers, elderly, female and casual workers. Too often, projects aimed at protecting workers' rights are not sensitive to children and do not take into consideration the risks and needs particular to children.

Children are entitled to fundamental rights that ensure their safety, dignity, and ability to thrive. These include the right to be protected from harm, the right to education, the right to be heard, and the right to access support or remedy when their wellbeing is threatened. Creating clear, safe, and accessible ways for children to raise concerns is therefore essential. Such mechanisms—whether within communities, schools, workplaces, or supply chains—must be child-sensitive, confidential, and responsive so that children feel empowered to speak up and receive meaningful support.

These rights are directly connected to the issue of child labour. When children are involved in work that is harmful, hazardous, or interferes with their education and development, their fundamental rights are being violated. Many of these violations occur in the context of business activities, especially within complex supply chains where oversight can be limited and risks may be hidden. Under international human rights standards, businesses have a responsibility to respect the rights of all individuals linked to their operations, products,

The objectives of this feasibility study were to:

- ✦ Create a **preliminary framework for implementing a child-friendly grievance mechanism**, focusing on the cocoa sector and related industries within cocoa regions
- ✦ Provide an overview of **child rights risks in the specified cocoa districts and analyse actors involved**, using the ICI Social Protection Mapping Study for guidance
- ✦ Establish the **key criteria and conditions necessary for the successful implementation** of a child-friendly grievance mechanism.
- ✦ Identify potential **implementation risks and recommend strategies to mitigate** them effectively.
- ✦ Develop a **step-by-step plan for institutionalising the mechanism**, including efficient reporting processes, case management responsibilities, and a budget with potential funding sources.

or services—including children. This means identifying, preventing, and mitigating child labour risks, engaging responsibly with affected communities, and ensuring that children have access to remedy when harm occurs. Where businesses contribute to or cause harm, they are expected to participate in making things right, including through remediation processes that prioritise the best interests of the child.

Child labour is most prevalent at the bottom of supply chains, areas in which buyers have very little visibility and leverage, especially in agricultural contexts where raw materials such as cocoa are grown by smallholders defined by casual, seasonal work. Nonetheless, the responsibilities and duties that stakeholders have in global supply chains to provide **access to remedy** mean that it is critical to explore how we can provide avenues for children to voice their concerns and for risks and harms to be mitigated and remediated.

2. Theoretical approach

2.1 The UNGPs and the 7 effectiveness criteria

A grievance mechanism (GM) is a formal process through which individuals or groups can raise concerns or complaints about actual or potential adverse impacts on their rights, to resolve issues, provide remediation, and improve accountability and performance. GMs can operate on various levels: local or community level, company level, industry level, multi-industry level, national level, regional level or international level. They can include judicial and non-judicial processes for handling grievances, and can be state-based, non-state-based, or a combination of the two. An operational grievance mechanism is a system for addressing concerns or complaints directly at the operational level. Although extensive research has been done on the accessibility of GMs in providing access to remedy at the level of communities, such as that of the smallholder producers, much less research has been undertaken on the degree to which GMs can be accessible to children. This makes this study particularly timely, especially given the extent of child labour prevalent in African supply chains.

This feasibility study is guided by the fundamental principles outlined for grievance mechanisms in the United Nations Guiding Principles for Business and Human Rights (UNGPs). These principles are referred to as the **7 effectiveness criteria** and, for this study, were reviewed to be responsive to the specific needs and risks associated with children and reporting child labour. As this feasibility study deploys the 7 effectiveness criteria of the UNGPs as a guiding framework, it situates the study firmly within a human rights framework. The UNGPs were developed to recognise the responsibilities businesses and the duties states have to respect human rights in global supply chains, including those of children.

The third pillar of the UNGPs – Access to Remedy – is considered by many as the most important pillar of the UNGPs. It guides the responsibilities of states and the private sector to provide access to reporting human rights violations and the remediation of harms that occurred. Approaching grievance mechanisms through the lens of the UNGPs helps delineate the different responsibilities and duties of state-based and non-state-based actors (i.e., duty-bearers), and those who need to have access to remedy and whose rights need to be respected/protected (i.e., rights-holders such as community members and children). In rights-based grievance mechanisms, it is important to distinguish between the state's *duty to protect* human rights and a

“The emphasis on human rights is important, especially in relation to grievance mechanisms”

company's *responsibility to respect* them. While states must ensure that victims have access to effective remedy, this does not mean they alone must directly provide it in all cases. Rather, states are required to establish and maintain conditions in which remedy is accessible—by strengthening judicial systems, reducing legal and practical barriers, and providing effective non-judicial grievance mechanisms to complement courts. Because judicial processes cannot address all alleged abuses, states may also expand or create non-judicial avenues to fill gaps where appropriate.

For companies, the responsibility to provide remedy depends on their involvement in the harm. When a business has caused or contributed to an adverse impact, it is expected to provide or cooperate in effective remediation, including through operational-level grievance mechanisms. Where agreement on an appropriate remedy cannot be reached between the company and affected people, the UNGPs' Interpretative Guide notes that involving a neutral third party as mediator may be necessary.

The UNGPs also made human rights a key compass for addressing and remediating corporate impacts. The emphasis on human rights is important, especially in relation to grievance mechanisms, as it enables us to ensure that grievance mechanisms are equitable and designed in such a way that people, including children, are treated with respect and dignity. Situating this study within an international human rights framework, instead of limiting it to local legal codes or other standards, enables individuals to raise concerns in relation to internationally recognised conventions, including those protecting children's and other fundamental rights.

The key to understanding the fundamental principles of an effective grievance mechanism is about differentiating between channels through which rights-holders can lodge a grievance (e.g. an entry point or a reporting channel) and the entire process through which a grievance is received and resolved. In this report, grievance mechanisms are considered in the latter definition, where trust is achieved by effectively responding to and remediating a grievance. As stated by the UNGPs: ***“A grievance mechanism can only serve its purpose if the people it is intended to serve know about it, trust it and are able to use it”*** (pg. 34). The way to guarantee access and trust in a grievance mechanism is by following the 7 effectiveness criteria of the UNGPs. This criteria states that non-state-based operational grievance mechanisms should be:

- 1 **LEGITIMATE,**
- 2 **ACCESSIBLE,**
- 3 **PREDICTABLE,**
- 4 **EQUITABLE,**
- 5 **TRANSPARENT,**
- 6 **RIGHTS-COMPATIBLE , AND**
- 7 **A SOURCE OF
CONTINUOUS LEARNING**

i

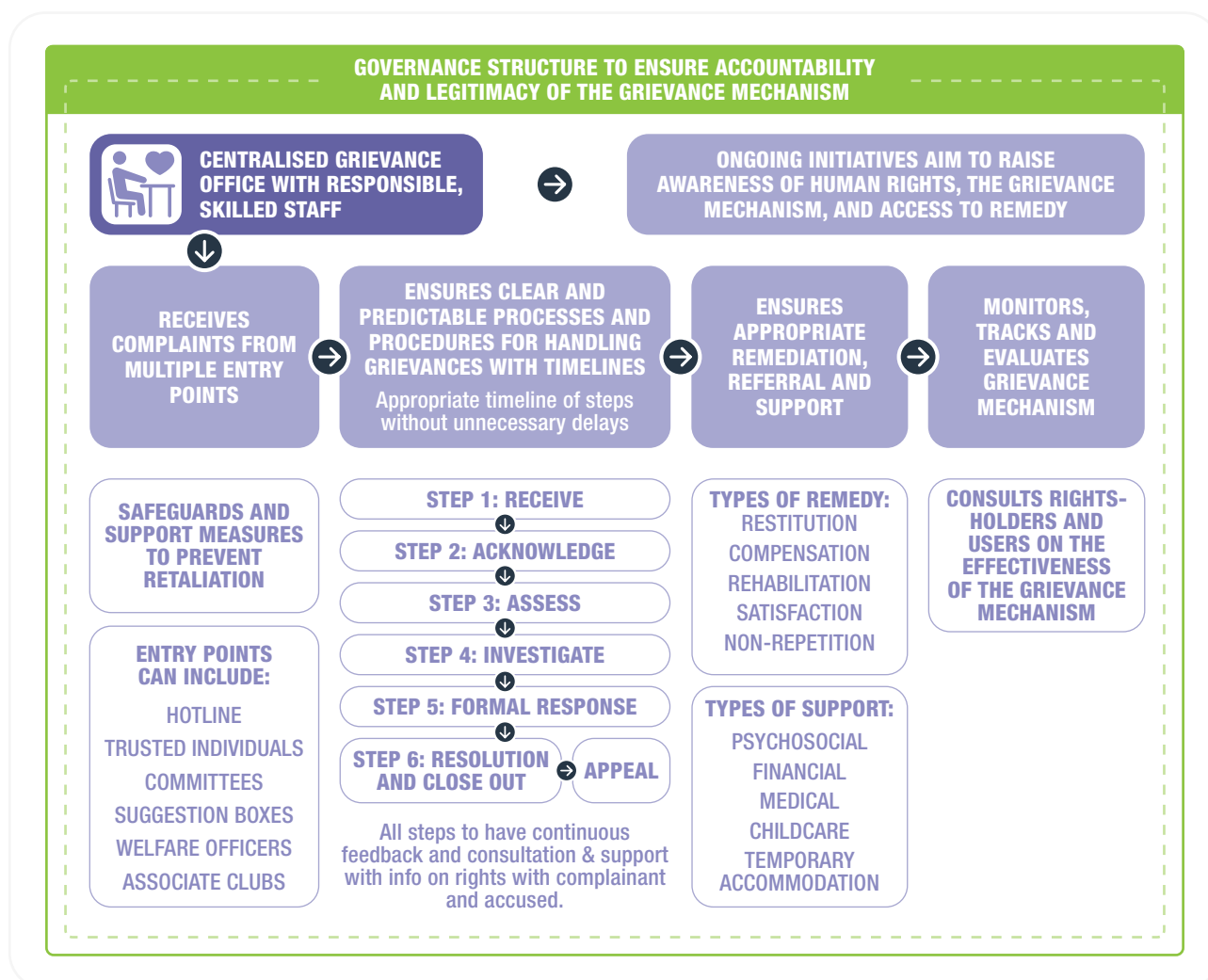
International Best Practice Frameworks for Grievance Mechanisms:

- [United Nations Guiding Principles \(UNGPs\)](#)
- [OECD Guidelines for Multinational Enterprises](#)
- [ILO Tripartite Declaration of Principles Concerning Multinational Enterprises and Social Policy](#)
- [Ethical Trade Initiative – Access to Remedy: Practical Guide for Companies](#)
- [Shift – Remediation, Grievance Mechanisms and the Corporate Responsibility to Respect Human Rights](#)



In practice, this means that grievance mechanisms must be trusted, easy to use, clear in process and outcomes, fair, respectful of rights, open about performance, and regularly improved. The UNGPs' effectiveness criteria apply to both state-based non-judicial grievance mechanisms (such as National Human Rights Institutions) and non-state-based grievance mechanisms (such as company operational grievance mechanisms).

The diagram below provides an overview of the elements that make up a best practice example of a grievance mechanism. Partner Africa specifically developed this blueprint model of a grievance mechanism for this feasibility study so that child-friendly elements are built on best practice guidance. (see information box below). This model is presented in more detail in section 7 of this report, where the fundamental elements have been enhanced to be **effectively child-friendly**.



■ **Figure 1: The diagram presents a potential model for a state-based (non-judicial) and non-state-based grievance mechanism that meets the 7 effectiveness criteria.**

The diagram above illustrates the key building blocks of an effective grievance mechanism, which should be adapted to local contexts and the specific needs of vulnerable people in scope for whom the mechanism is intended, e.g., children or women. Below is a summary of these fundamental elements, aligned with the 7 effectiveness criteria of the UNGPs.



→ GOVERNANCE STRUCTURE TO ENSURE ACCOUNTABILITY AND LEGITIMACY

An independent multi-stakeholder governance structure (such as a stakeholder body and/or grievance committee), that includes rights-holder representation, is established to enhance legitimacy and equity by ensuring oversight, impartiality, and accountability. It reinforces trust and prevents conflicts of interest, victimisation and retaliation in grievance handling. To maintain independence and trust, the governance committee should be structurally separate from day-to-day operations, especially in operational grievance mechanisms.

→ CENTRALISED GRIEVANCE OFFICE WITH RESPONSIBLE, SKILLED STAFF

The grievance mechanism should be anchored in a centralised office staffed by trained, impartial, and trusted personnel. Staff must possess the skills to handle sensitive cases—such as those involving gender, children or power imbalances—with confidentiality, empathy, and cultural awareness. The office should operate independently from management or industry influence, ensuring accessibility, accountability, and adherence to the UNGPs' effectiveness criteria, particularly legitimacy, equity, and rights-compatibility.

→ ONGOING INITIATIVES TO CREATE AWARENESS OF HUMAN RIGHTS

Regular awareness-raising is undertaken to ensure that all stakeholders and rights-holders—including workers, children, families, and community members—understand their rights and responsibilities. Awareness efforts are sensitive to literacy barriers, language, gender, children and local socio-cultural dynamics.

→ ONGOING INITIATIVES TO CREATE AWARENESS OF THE GRIEVANCE MECHANISM AND ACCESS TO REMEDY

Information campaigns and sessions are conducted to ensure all stakeholders and rights-holders understand how to use the grievance mechanism, what it covers, and the outcomes to expect. These efforts enhance transparency and predictability, empowering users to make informed decisions about reporting concerns. Awareness initiatives are designed to be accessible, considering literacy barriers, language, gender, age, and local socio-cultural dynamics. Importantly, they adopt a survivor-centred approach, prioritising the rights, needs, and wishes of victim-survivors in all actions and decisions, ensuring their dignity, safety, and agency are upheld throughout the grievance process.

→ MULTIPLE ENTRY POINTS

Multiple, confidential entry points—such as hotlines, in-person reporting, suggestion boxes, or community focal points—are available to make the mechanism confidential, anonymous, accessible and safe. These channels must accommodate different literacy levels, ages, languages, and digital access barriers.

→ CLEAR AND PREDICTABLE PROCESSES AND PROCEDURES FOR HANDLING GRIEVANCES WITH TIMELINES

A clear, well-communicated centralised point is established to ensure that all grievances are logged, acknowledged, and tracked from the start to resolution in a manner that would foster trust and accountability. This supports predictability and helps ensure consistent and fair treatment of all cases. Documented procedures have been developed (such as standard operating procedures – SOPs) — from intake to resolution — building predictability and transparency, setting clear expectations for all parties. Defined timelines and responsibilities reducing the risk of delays and builds user confidence. These processes and procedures are aligned with human rights conventions. They ensure that all parties are continuously consulted, treated with dignity and respect, and informed of the process and their rights. The process also provides support services, such as psychosocial or medical support, transportation, information about paralegal services. It may include the following steps:

1. Receive
2. Acknowledge
3. Assess
4. Investigate
5. Formal Response
6. Resolution and close out
 - a. Appeal (where required)

→ REMEDIATION

Several pathways to remedy are clearly defined to restore rights and dignity, including mediation, referral and support. Remediation is rights-compatible and may include restitution, compensation, rehabilitation, guarantees of non-repetition. These pathways also include support to access state-based services such as the police service, judicial, social welfare etc.

→ MONITORING, TRACKING AND REVIEW

Processes are in place for ongoing learning and continuous improvement of the grievance mechanism. Continuous feedback and consultation with affected individuals throughout the process reinforce accessibility, trust, and participation—making the mechanism both effective in delivering remedy and instrumental in strengthening respect for human rights. Other rights-holders, especially more vulnerable rights-holders such as children, illiterate people, people with disabilities, women, are consulted on the effectiveness of the grievance mechanism, especially with regard to its accessibility and mandate to foster trust and accountability.

3. Methodology

This study employed a qualitative approach to assess the feasibility and design requirements for implementing a child-friendly grievance mechanism within Ghana.

This approach was selected to ensure we capture the complex social, cultural, and institutional dynamics within Ghana's cocoa-growing regions, as well as to provide children a safe space to participate in the study by sharing ideas and thoughts on how they can safely report issues of child rights risks and abuses. The methodology was structured in sequential phases, combining desk-based research, stakeholder engagement, field research, and participatory validation processes.

The study commenced with an inception phase involving alignment meetings with key project stakeholders to establish clear project parameters, communication protocols, and methodological agreements. An inception report was developed (and signed off by ICI) outlining the agreed approach, methodology, and implementation timeline, serving as the foundational framework for all subsequent research activities.

A comprehensive literature review was conducted examining child rights risks within Ghana's cocoa sector, existing grievance mechanism models, and the broader environmental, cultural, social, legal, and political context. This desk-based research was enhanced through virtual stakeholder interviews with experts on grievance mechanisms and key actors within Ghana's cocoa sector.

Concurrent with the literature review, a detailed stakeholder mapping exercise was undertaken to identify relevant duty-bearers, rights-holders, and supporting actors involved with child protection in Ghana and beyond. This mapping exercise utilised both purposive sampling based on ICI's input and snowball sampling techniques to ensure comprehensive stakeholder identification and understanding of respective current roles, leverage points, and capacity gaps. See [Annexure A](#) for a full list of stakeholders engaged for this research. Before fieldwork deployment, the research tools were developed, each tailored to specific target groups. Special care was taken to develop research tools that were appropriate to the wide range of

Research Phases



Phase 1: Inception Phase

- ✦ Alignment meetings with stakeholders
- ✦ Establish project parameters
- ✦ Communication protocols
- ✦ Inception report development



Phase 2: Desk-based research (with virtual interviews)

- ✦ Child rights risks examination
- ✦ Grievance mechanism models review
- ✦ Context analysis (environmental, cultural, social, legal, political)
- ✦ Virtual stakeholder interviews
- ✦ Stakeholder mapping (identifying duty-bearers and rights-holders)



Phase 3: Field plan preparation

- ✦ Tailored tools for target groups
- ✦ Key informant interview guides
- ✦ Child-friendly interview tools (fun, non-threatening approaches)
- ✦ Safeguarding measures integration



Phase 4: Stakeholder interviews and workshops

- ✦ Hosting of community, district and national workshops
- ✦ Engaging communities and children on reporting mechanisms



Phase 5: Data Collation and Analysis

- ✦ Collating data from desk-based research, workshops and field research
- ✦ Develop recommendations and draft concepts



Phase 6: Validation of research

- ✦ Hosted two workshops to validate the research collected and recommendations developed



Phase 7: Development of final report

- ✦ Based on study develop a final report

stakeholders engaged in this project. For example, for the key informant stakeholder interviews, the targeted questions were very specific to the institutional capacities of existing organisations and agencies in implementing child-friendly grievance mechanisms, as well as to get an understanding of existing reporting procedures and their strengths and weaknesses. **The interview tools for children were developed in such a way as to create a fun and non-threatening environment, making sure that children can speak freely and without fear of victimisation.** This approach proved to be important, as it was evident that children were very much aware of how “outsiders” view children working on farms and that they might get someone in trouble if too much is shared on the conditions of this work. **Partner Africa considered the voices of children to be fundamental to this study and took great care to harness their views in the recommendations put forward in this report.** The field plan and stakeholder engagement plan included robust safeguarding measures to protect vulnerable participants, particularly children. Research associates received specialised training in child protection protocols and ethical research practices. Throughout all phases, the methodology prioritised participant safety, informed consent, and cultural sensitivity. Special safeguarding measures were implemented for children, including age-appropriate engagement methods and creating secure environments. All research activities were conducted



in accordance with international standards for ethical research involving vulnerable populations. The researchers allocated for this fieldwork speak the local languages and have deep expertise on issues related to human rights and sustainability, especially in the Ghanaian cocoa industry.

Field research was conducted in two cocoa-growing districts in Ghana, identified by the ICI:

- Assin South District
- Bibiani-Anhwiaso-Bekwai Municipality (commonly referred to as Bibiani Municipality)

Data collection combined engaging research participants through interactive and participatory workshops and individual and group interviews, ensuring diverse perspectives were captured across different stakeholder categories and geographical locations. See below for an overview of the different research methods deployed in this study:

National Workshop

Interactive workshop with high-level stakeholders from civil society, state departments, and the private sector with expertise on child protection, the Ghana cocoa industry and child rights risks. The workshop was held in Accra, Ghana and comprised of 20 participants. Workshop was designed to facilitate discussion around key topics ensuring that research outcomes are achieved.

District Workshop

Interactive workshop with stakeholders from district level, including civil society, local state departments and community representatives with expertise on child protection, the Ghana cocoa industry and child rights risks. The workshop was held in Assin South, Ghana and comprised of 23 participants. The workshop was designed to facilitate discussion around key topics ensuring that research outcomes are achieved.

Community Workshop

Interactive workshop with community members including traditional leaders, community-level civil servants, smallholders, and community members involved with child protection. The workshop was held in Bibiani, Ghana and comprised of 23 participants. The workshop was designed to facilitate discussion around key topics ensuring that research outcomes are achieved.

Virtual and in-person In-depth Individual Interviews

Structured interviews with duty-bearers and key actors involved with child protection and child rights risks, grievance mechanisms, community welfare, the cocoa industry. 12 experts were engaged in-person or virtually.

Focus Group Discussions (FGDs)

Community-level discussions with guardians, teachers, community leaders, and other stakeholders. Four FGDs were held in three different communities, namely: Tsehentse of the Assin South District and Fahiakobo and Abesinsuom of the Bibiani Municipality. The average number of participants of the FGDs was 11. The FGDs were segregated by gender.

Child-Sensitive Research

Age-appropriate participatory methods including storytelling and participatory discussions.

Children between the age of 6 and 17 were engaged in all the regions and districts in scope.

A total of 45 children participated in this study.

Casual Community Interviews

Open-ended participatory interviews with community-level rights-holders and duty-bearers. The interviews were held in two communities of the Assin South district known as Tsehentse and Abodweseso and in three communities of the Bibiani Municipality known as Abesinsuom, Basengele and Fahiakobo. The interviews comprised of 17 people.

Overall, 195 individuals were engaged in the study through a combination of qualitative methods. These included 41 individual interviews, nine focus group discussions (four with adults and five with children, totalling 89 participants), and three stakeholder workshops involving 65 participants.


195

Total Individuals Engaged

through a combination of qualitative methods


41

Individual Interview Sessions


9

Focus group discussions


89

Interviewed Participants

during the 41 interviews and 9 focus groups


3

Stakeholder Workshops

involving 65 participants


45

Children Engaged in the Study

“Engaging children in cocoa-growing communities in the study was essential”



Engaging children in cocoa-growing communities in the study was essential because they are the primary users of child-friendly grievance mechanisms. Their participation ensured that the research captured firsthand experiences, identified barriers and enablers from their perspective, and upheld their right to be heard in matters affecting them in the communities they live in. This approach strengthened both the validity of the findings and the rights-based foundation of the study.

Two validation workshops were subsequently conducted at the district and national level to validate the research findings and recommendations. These sessions provided opportunities for stakeholders to review, discuss, and provide feedback on preliminary findings and recommendations of the research, ensuring the final outputs reflected perspectives from all stakeholders and practical implementation considerations.

The outcomes of the workshops and validation meetings largely centred on participants' feedback regarding existing avenues for children to report concerns, particularly state-based structures (see Chapter 6). Participants discussed both the opportunities and barriers associated with these mechanisms, but expressed a strong view that a potential investment in a Child-Friendly Grievance Mechanism (CFGM) would need to be led and owned by the government to ensure effectiveness and sustainability. Community workshop participants also highlighted that they currently lack sufficient support in protecting children and expressed a desire for greater guidance and resources to fulfil this role.

The data collected was systematically collated and analysed to identify key themes and patterns. This analysis was benchmarked against existing guidance on child-friendly grievance mechanisms and the 7 effectiveness criteria of the UNGPs to develop the recommendations presented in this report.

Research limitations

- The study was confined to only two out of the ten cocoa regions in Ghana and therefore geographically excluded most of Ghana. This restricted the generalisation of the data to other communities in Ghana (see point below). However, additional interviews with experts on child protection in Ghana were also consulted to represent a broader constituency in the data. These experts have oversight responsibility for child protection in all cocoa regions.
- The two regions in the scope of the fieldwork have been subjected to a range of interventions on child protection, and there was, in general, awareness of the risk of child labour, and the spotlight that the international community was placing on the risks of child labour in Ghana, especially in relation to cocoa. This awareness cut across community interviews, including children, parents, adults and community leaders. As a result, participants may be more informed about child labour risks, more cautious in their responses, or more likely to provide socially desirable answers. Their awareness may not reflect the situation in less-intervened communities.
- The data validation process included a district and a national validation workshop. A community validation workshop was not held due to budget and operational constraints; however, community representatives were invited and attended the district validation workshop.
- A key limitation of this research concerns the degree to which children can safely and meaningfully participate in research processes. In contexts where extensive child labour research has already been conducted, children may experience research fatigue, distrust, or even fear of repercussions from adults or employers if they are seen engaging with researchers. Power imbalances and the risk of re-traumatisation further constrain the extent to which children's voices can be ethically and safely included. As a result, while every effort was made to apply child-friendly and ethical research principles, children's participation may have been more constrained than ideal, potentially limiting the depth of first-hand perspectives captured.
- Given the sensitivity of the subject of the research, those duty bearers tasked with the responsibility to protect children may have been inclined to present existing measures in a more positive light or to be defensive of current approaches. While their perspectives are valuable, this dynamic may have influenced the level of critical reflection or openness to the gaps in child protection systems in discussions.

4. Introduction to Child-Friendly Grievance Mechanisms

To understand the feasibility of a child-friendly grievance mechanism tailored to the Ghanaian context, the study examined existing child-friendly grievance mechanisms, particularly those with similar socio-economic and agricultural contexts. Lessons from such frameworks provide valuable insights into effective approaches, potential challenges, and key considerations for ensuring children's rights are protected within sector-specific grievance processes.

4.1 Overview of existing channels through which children report issues

Globally, child-friendly grievance mechanisms (CFGMs) are designed to ensure that children can safely report abuse, exploitation, or other concerns and receive age-appropriate support. They typically emphasise accessibility through multiple reporting channels (such as hotlines, community focal points, or digital tools), confidentiality and protection from retaliation, participation of children in the design of the mechanisms, and clear, timely referral pathways to protection and social services. In the agricultural sector, CFGMs must navigate additional challenges associated with dispersed and informal work sites, seasonal and family labour, and low literacy levels. Successful models, therefore, integrate reporting options at the level of the community with company-level grievance mechanisms. A company-level grievance mechanism is a formal process established by a business to receive and handle grievances. These approaches acknowledge that addressing the root causes of child labour and other forms of exploitation requires both responsive grievance handling and preventive socioeconomic measures.³

Existing channels through which children can report issues can be roughly classed into three groups. The first and most common are **national child helplines**. These are typically set up under [Child Helpline International](#), featuring a 24-hour hotline that can be used by children and others to report issues, often with

the prefix 116. In Ghana, this helpline is currently being piloted. National child helplines provide free confidential counselling and referral services and are the most effective when backed by state funding and fully integrated with state support services and scaled across the nation. Additional hotlines may exist along with child-friendly hotlines available to report issues related to domestic violence, child abuse, etc., and are also available to children, albeit not explicitly as "child-friendly" as child hotlines.

Another state-based institutional channel through which child-related issues can be reported is through **National Human Rights Institutions (NHRIs) or ombudsperson structures**. UNICEF has developed a guide for states to review current NHRI processes to be more child-friendly and meet the duties of states to provide children access to remedy.⁴ The overarching principles that UNICEF sees as instrumental to child-friendly complaint mechanisms are:

1

Using the Convention on the Rights of the Child as a framework

2

The best interests of the child need to be respected throughout

3

Communicate with children directly in a safe, respectful and non-threatening manner

4

Ensure that the mechanism is non-discriminatory and is accessible to the most vulnerable children, including migrant children

5

Continuously assess the safety of children

6

Staff responsible for handling children should receive adequate training



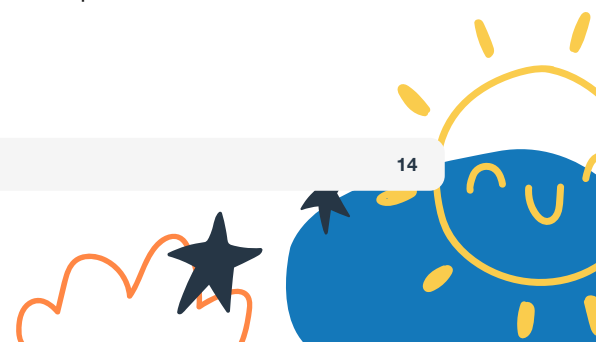
While several states have established standards and toolkits to make NHRI's more child-friendly, most still face challenges such as limited awareness among children and caregivers, weak links between reporting and effective remediation, and under-resourced referral systems.⁵ The UNICEF guideline does not specifically reference examples of African NHRIs that are child-friendly, but both Kenya and South Africa receive and handle child-related abuses. These state-based organisations are born from the domestication of international human rights conventions, including those related to the Convention on the Rights of the Child (UNCRC). The Commission on Human Rights and Administrative Justice (CHRAJ) is Ghana's independent NHRI, with a specialised Special Groups Unit handling child rights issues. While there is no separate budget for children's rights, these issues are embedded across CHRAJ's human rights, anti-corruption, and ombudsman mandates. The Commission collaborates with line ministries, law enforcement, UN agencies, and NGOs to address child protection, conduct awareness campaigns, and engage children directly through school programmes, human rights clubs, and residential camps. CHRAJ also participates in regional and international human rights bodies. Complaints handling is a core function: the Commission receives, investigates, and provides remedies for violations, and in 2023, the majority of complaints received related to children's rights, including issues such as maintenance, denial of basic necessities, custody disputes, early and forced marriage, and corporal punishment.⁶ Through these efforts, CHRAJ plays a central role in promoting, protecting, and monitoring the rights and welfare of children in Ghana.

Inter-state support to receive and handle child-related issues is managed by institutions such as the African Committee of Experts on the Rights and Welfare of the Child (ACERWC) - a regional treaty body that accepts communications on violations of the African Charter on the Rights and Welfare of the Child. This mechanism is not directly accessible to children, but the relevance is in its power to address regional cases such as those of trafficked child labour.

Existing state-based services for children to report issues, often owned by ministries charged with the responsibility of child protection, are further enhanced by non-governmental organisations (NGOs) and other organisations offering children access to remedy or reporting (see Chapter 6 for Ghana-specific examples). Locally based and international NGOs' reporting channels and child protection services are independent of the state but plug (and are often well integrated) into state services where needed. For example, where a child-related issue is criminal in nature, the NGO will support victims to report the issue to the local police service.

More recently, due to international pressure on businesses to address human rights violations in their supply chains, including those related to children, businesses too have started implementing initiatives to enhance child protection, including giving children, parents, workers and other rights-holders access to non-state-based grievance channels. Although these mechanisms are largely driven by the concerns of the existence child labour in global supply chains – particularly in mining and commodities such as cocoa – and therefore do not always cover the full range child rights risks (such as child neglect or domestic abuse), they are still useful to consider for this study given the high risk of child labour in Ghana, and the international concern for child labour in cocoa supply chains. On the ground, these are often implemented with NGOs and range in nature, from more standard hotline-type grievance channels to community-based child protection committees or child office desks or hubs.

For example, the Centre for Child Rights and Business has established a series of Child Rights Action Hubs to strengthen collective action on child labour prevention and remediation in high-risk supply chains.⁷ These hubs operate as multi-stakeholder platforms bringing together businesses, community organisations, and government actors to coordinate child protection and promote sustainable remediation pathways.



Addressing the known risks of child labour in the mining sector of the Democratic Republic of Congo (DRC), the Child Rights Action Hub addresses child labour and other human rights risks associated with artisanal and small-scale cobalt mining. The hub supports community-based grievance and remediation processes that provide affected children and their families with immediate assistance, including case management and referrals, alongside long-term measures such as access to education, vocational training, and alternative livelihoods. By centering local participation and building capacity within communities, these hubs aim to establish a sustainable, locally owned system for preventing child exploitation in mining areas. Grievance mechanisms such as these, driven by the private sector and NGOs, are further discussed below in relation to the differentiation between proactive and reactive grievance mechanisms. Yet in general, children are largely poorly represented in non-state-based business-owned grievance mechanisms.

4.2 Proactive and reactive grievance mechanisms

A useful distinction can be made between proactive and reactive grievance mechanisms. Most grievance mechanisms are **reactive in nature**, responding to issues only once they are reported rather than actively seeking them out. **Proactive mechanisms** are systems that work to prevent, detect early, and remediate child abuses before harm occur. They rely on community members themselves—those who live and work in the affected areas—to monitor risks, engage with families, and identify early warning signs. Through regular monitoring, risk-based targeting, and data-informed decision-making, these mechanisms help uncover child labour vulnerabilities before they escalate. By combining early detection with local engagement and follow-up on remediation, proactive mechanisms strengthen community ownership and reduce the likelihood of children being exposed to harmful working conditions.

The ICI's Child Labour Monitoring and Remediation Systems (CLMRS) is a leading example of such a proactive mechanism.⁸ CLMRS integrates continuous monitoring within communities and supply chains, combining household visits to seek out children at risk of child labour and simultaneously raising awareness on child labour. This allows companies and local actors to proactively identify children at risk early, connect families to social services, and strengthen prevention through targeted remediation. The key strength of the CLMRS lies in its bottom-up, supportive approach to addressing child labour, which helps overcome the trust and socio-cultural barriers that often limit the effectiveness of reactive grievance mechanisms. By engaging local people in monitoring and response, CLMRS creates strong ownership and enables context-specific solutions that reflect the realities of affected children and families.⁹

This grassroots model makes CLMRS both proactive and adaptable, allowing interventions to be better aligned with local needs.¹⁰

Similarly, the chocolate brand Tony's Chocolonely has implemented CLMRS within cocoa farming cooperatives, led by local facilitators who visit households to identify and address child labour cases.¹¹ The system engages communities and local structures to ensure that responses—such as support for schooling, healthcare, and birth registration—are appropriate and sustainable. The approach also addresses underlying economic factors by working with cooperatives through long-term contracts and premium payments timed to support families at the start of the school year, helping reduce reliance on child labour.

However, the effectiveness of proactive grievance mechanisms such as CLMRS can be limited by resource constraints, inconsistent implementation across communities, and challenges in sustaining long-term remediation where deep-rooted socio-economic factors drive child labour, as discussed in more detail in Chapter 7.

As per the research done by The Remedy Project and The Centre for Child Rights and Business, barriers that are generally specific to children in accessing both proactive and reactive grievance mechanisms include:¹²

- No or poor procedures in place for handling grievances raised by children or related to children's issues
- Grievance processes are not sensitive to children's perspectives and rights, and cases are not always handled in the best interests of the child
- Inappropriate or ineffective remediation if a case of child labour has been reported, leading to resolutions that may cause more harm
- Focus is more on the risk of child labour than on meaningful remediation
- Poor or no attention is paid to the root causes of child labour, failing to ensure proper monitoring and follow-up
- Mechanisms are poorly financed and resourced, undermining the potential to provide meaningful "access to remedy"

Ultimately, in line with the UNGPs and UNICEF guidance, grievance mechanisms should move beyond only identifying child-related issues to ensuring access to remedy. This means restoring the dignity of children who have been harmed and re-establishing their access to their rights — including the right to education, to rest and play, and to develop and grow in a healthy environment. It also implies that grievance mechanisms need to be accompanied by initiatives tackling the root causes and drivers of child-related issues, such as child labour.

5. Overview of Child Rights Risks in Ghana

This section provides an overview of child rights risks in Ghana. It draws on desktop research and the field research undertaken for this study, presenting risks that are general to Ghana and more specific to the regions in which the fieldwork was undertaken, as well as the cocoa industry. The field research data confirms the desktop research and points to key underlying drivers for child rights risks highlighted at the end of this chapter.

Children are exposed to a wide spectrum of risks as they depend on their guardians and parents for their safe and dignified growth and development. These include risks related to their development (such as malnutrition, poor living conditions etc), risks related to exploitation and abuse (such as child labour and hazardous work, sexual exploitation and abuse, child trafficking, violence etc), civil rights risks (such as suppression of freedom of expression or invasion of privacy), discriminatory risks (such as discrimination based on gender, disability or identity, migrant-status etc) and lastly risks related to the family environment (such as a lack of care or safe environment, removal of the child from the parents etc). Each of these risks violates a child's fundamental rights as inscribed in the Convention on the Rights of the Child, which can be summarised **as children's rights to be heard, their rights to a standard of living adequate for their physical and mental development, their rights to be protected from abuse and exploitation, and their rights to protection from discrimination. The actions taken to guarantee these rights can be summarised as child welfare and child protection.**

In Ghana, children face a wide range of risks, often rooted in the socio-economic context of the country. Impoverished parents struggle to adequately protect their children against harm and ensure their children's access to a decent standard of living and education.

Key risks children face



Child Labour



Suppression of Expression



Hazardous Work



Invasion of Privacy



Malnutrition



Discrimination



Poor Education Access



Unsafe Home Environment



Sexual Violence & Abuse



Poor Living Conditions



Child Trafficking



Early Marriage



Violence & Neglect



Limited Agency

770k children in cocoa growing areas in child labour

55% of children in those areas work in cocoa

Top 10 Ghana ranks among the top 10 globally for child labour

In 2022, **17%** of children showed signs of stunted growth due to malnutrition.¹³ Many children still do not enrol or complete school in Ghana; learning outcomes are typically low, with only **19-25%** of pupils meeting the proficiency criteria in national assessments, and many children finish school without basic literacy and numerical skills.¹⁴ Children's safety and well-being are also undermined by exposure to sexual violence, abuse, and harassment, with girls being particularly at risk. While difficult to adequately account for this risk due to fear of reporting, up to **25%** of sexually active girls and **7%** of boys have reported instances of coercion and rape in a study done in 2015.¹⁵

Child labour remains a serious concern: according to the 2018/19 NORC study, around **770,000** children in Ghana's cocoa-growing areas are engaged in cocoa production, and **55%** of children in agricultural households in those areas (5–17 years old) work in cocoa — nearly half involved in hazardous labour.¹⁶ Ghana is ranked among the **top 10** countries globally with the highest rates of child labour, reflecting the deep-rooted challenges of child protection, as **73.4%** of children are what UNICEF refers to as “multi-dimensionally poor”.¹⁷ A child is considered multidimensionally poor when they are deprived of three or more fundamental rights essential to their well-being and development, such as nutrition, health, education, water, sanitation, housing, or protection. This is considered the key driver of child rights risks not only in Ghana, but more widely as well. At the regional level, Sub-Saharan Africa has the highest prevalence and number of children in child labour, with nearly **88.6 million** children (**23.9%**) affected, far exceeding other regions such as Asia, Latin America, and Europe. This underscores the scale of the issue in Ghana as part of a wider regional crisis.¹⁸

In the day-to-day lives of ordinary Ghanaians, the actual impact of child labour and its extent vary. For example, household-based or smallholder farming dominates the agricultural sector, where children support their families with farm work. This work spans a wide spectrum — from activities that clearly constitute child labour due to abusive and exploitative conditions, to forms of work where the impact on children is harder to determine, to tasks that can positively support children's development and family wellbeing.

During interviews, stakeholders acknowledged that child labour, including the worst forms of child labour, is a problem in Ghana. They noted that children work on the farms without shoes or any protection. They carry heavy loads and often work with cutlasses to cut cocoa pods. One female farmer noted: “**Children carry heavy farm products for long distances. I saw one just recently and I queried her mother about it. I told the child to put down the heavy load and not carry it again**”. Beyond child labour, other child rights risks noted during interviews

included child neglect (due to poverty but also other reasons), violence, child sex work, and defilement of young girls. In the communities, teachers and farmers reported various issues related to child labour, including safety concerns.

Another key concern that emerged was the **limited involvement of children themselves in identifying and remediating these risks**. During one interview, a key stakeholder highlighted this gap, noting: “**A prevalent child rights risk is the non-involvement of children in decision-making and in the processes that affect them.**” This lack of participation constitutes a rights concern in its own right, as it undermines children's agency and voice — both essential principles within the child rights framework. This risk has been noted by a study from 2018 as well, noting that children feel particularly insecure in participating in child protection processes when adults are in their presence, such as their parents, which relates to the local socio-cultural dynamics in Ghana.¹⁹



The exclusion of children from policies and frameworks designed to protect them is deeply rooted in socio-cultural beliefs about the role of children in society. In many African communities, including Ghana, children are often seen from the perspective of the family or community, which can overshadow their individual rights to education, rest, and participation in decision-making processes.²⁰ For instance, socio-cultural norms may prioritise collective family responsibilities over individual child welfare, leading adults to expect children to work even if detrimental to their development and well-being or engage in early arranged marriages. Furthermore, these socio-cultural contexts can create barriers for children to report issues, as children are not typically encouraged to voice disagreements with adult decisions (discussed in more detail in Chapter 7). This lack of agency and empowerment of children can perpetuate harmful practices and hinder the effective implementation of child protection measures. Added to these local dynamics is the fact that often in rural communities, who is considered a child is not always based on age but instead on culturally significant factors, such as if a young person has undergone certain rites of passage, contradicting the definition of a child and its accompanying protections by international frameworks.²¹ As one participant mentioned in the community workshop, *“Do not conflict our social customary rights with children’s rights.”* Yet, it should be noted that cultural norms can vary greatly between and within communities, and it is often the case that exploitation and abuse of children stem from a range of factors, not just how children are perceived socio-culturally.



In summary, children in Ghana face a wide range of risks. Some stem from the impoverished communities in which they live—such as limited access to quality education, child labour, and food insecurity—others relate to how vulnerable children are exploited through sexual harassment, abuse, violence, and other forms of exploitation, and how children are perceived. Grievance mechanisms on their own, particularly reactive grievance mechanisms, cannot adequately address these risks. Grievance mechanisms and access to remedy need to be accompanied by a range of interventions that address the root causes and drivers of child rights risks. The most prominent root causes and drivers that emerged from both the desk research and fieldwork are:



POVERTY AND ECONOMIC VULNERABILITY

often push households to rely on children’s labour to meet basic needs, or households are unable to meet children’s developmental needs



LIMITED ACCESS TO EDUCATION, due to costs, distance, or lack of facilities, reduces opportunities for children to attend school.



SOCIAL AND CULTURAL NORMS, including expectations around child work and gender roles, can normalise risks around child labour



POOR AWARENESS OF CHILD RIGHTS AND ASSOCIATED RISKS

means that communities, caregivers, and workers may not fully recognise or prevent exploitation.



PRESSURES IN GLOBAL SUPPLY CHAINS, including low prices for raw materials and products combined with poor yields (particularly in Ghana), incentivise exploitative practices



LACK OF SUPPLY CHAIN TRANSPARENCY makes it harder to identify and address child rights risks, particularly in the informal markets



LIMITED RECOGNITION OF CHILDREN’S VOICES

both in policy development and at the community level, where socio-cultural norms often prevent children from speaking out or reporting issues.

Another driver is the extent to which both state and non-state organisations aiming to enhance child protection—through enforcement or grievance mechanisms—are accessible to children and communities. This issue is explored in more detail in [Chapter 7](#) on the barriers that children face in reporting issues.

6. Ghana Child Rights Protection Governance

This section provides an overview of national and regional governance systems for child protection in the cocoa sector, outlining existing legal frameworks and grievance mechanisms with their existing/potential actors and stakeholders with a duty/responsibility to advocate for child-friendly grievance mechanisms.

Legal frameworks give authority and boundaries to grievance mechanisms, while grievance mechanisms operationalise laws and reveal whether those laws are effective in protecting children's rights in Ghana.

Overview on this chapter

The section will provide an overview on the following national and regional governance systems for child protection:

- Legal Frameworks on Child Protection
- Existing structures providing children and rights-holders access to remedy
 - State-based structures
 - State-based reporting structures: Barriers and opportunities in providing access to remedy for child-related risks
 - Informal and non-state-based structures for child protection and access to remedy
 - Non-state-based reporting structures: Barriers and opportunities in providing access to remedy for child-related risks



6.1. Legal Frameworks on Child Protection

This section reviews the laws, policies, institutions, practices and stakeholders responsible for promoting and enforcing children's rights in Ghana. Additionally, the **current challenges and opportunities** for the legal frameworks to enhance the implementation of grievance mechanisms are discussed.

Ghana has made progress in combating child labour by ratifying important International Labour Organisation (ILO) conventions. Ghana has ratified 52 conventions of the ILO, including 8 out of the 10 fundamental conventions, of which a number of them are relevant to child labour protection, including C029, C105, C138 and C182. Below is listed the 10 fundamental conventions and their relation to the Ghanaian legal landscape:

ILO Forced Labour Convention (C029)
In force, 20 May 1957

ILO Freedom of Association and Protection of the Right to Organise Convention (087)
In force, 2 June 1965

ILO Right to Organise and Collective Bargaining Convention (C098)
In force, 2 July 1959

ILO Equal Remuneration Convention (C100)
In force, 14 March 1968

ILO Abolition of Forced Labour Convention (C105)
In force, 15 December 1958

ILO Discrimination (Employment and Occupation) Convention (C111)
In force, 4 April 1961

ILO Minimum Age Convention (C138)
In force, 6 June 2011

ILO Worst Forms of Child Labour Convention (C182)
In force, 13 June 2000

ILO Occupational Safety and Health Convention (C155) *Not adopted*

ILO Promotional Framework for Occupational Safety and Health Convention (C187) *Not adopted*

In addition, Ghana has also ratified the African Charter on the Rights and Welfare of the Child (ACRWC).

While ILO conventions are considered the most effective framework through which children can be protected in the working environment (that is, through the domestication of the conventions into the local law), it is also important to mention the United Nations' Convention on the Rights of the Child and the African Charter on the Rights and Welfare of the Child, which also provide important benchmarks for child protection.

Below is a summary of the local legal landscape that gives effect to international standards on child protection:

- ✦ **Children's Act (Act 560, 2016 - with another revision underway)** — provides a national legal framework for defining a "child" and sets out child rights, welfare principles, and protections. The Act is a foundational statute used alongside other labour and trafficking laws.
- ✦ **Labour Act (Act 651, 2003)** — establishes the minimum age of employment, prohibits hazardous and night work for children under 18, and creates labour-inspection and enforcement mechanisms used against child-labour offences.
- ✦ **Human Trafficking Act (2005)** — criminalises trafficking (including trafficking of children), removes consent as a defence, and provides for rescue, care and rehabilitation of victims.
- ✦ **Criminal Offences Act of 29 of 196** – bans slavery and customary servitude, including that of children

In addition to these legal frameworks guiding the protection of children exposed to a wide range of risks, the Ghanaian government have since 2009 developed national plans of action to improve child protection through various interventions and varying focus areas, e.g. worst forms of child labour (particularly mining) and improvement of coordination between departments. These action plans have been instrumental in the establishment of the multistakeholder National Steering Committee on Child Labour (NSCCL) and the Child Labour Unit, which are core to national implementation and coordination with districts and partners.

The most recent national action plan for 2023 to 2027 (NAP III - Ghana Accelerated Action Plan Against Child Labour - GAAPACL) was developed in collaboration with the United Nations Children's Fund (UNICEF) and the International Cocoa Initiative (ICI), with agriculture being a key focus area, along with mining, quarrying, transportation, etc. NAP III holds great promise for the fight against

child labour. Yet according to critics, one of the gaps that has been identified with NAP III is the discrepancy between policy and law, whereby the enhanced powers given to, for example, labour officers to support with child labour-related cases contained in NAP III have not yet been recognised in law.²² Equally, while it may be too early to review the effective implementation and roll-out of NAP III, the limited research undertaken for this study suggests that it has not yet reached rural communities.

The focus on child labour in the cocoa industry has also spearheaded policy and legal developments in other ways. In 2008, the government adopted a policy framework to guide definitions of hazardous work by children in the cocoa sector, which has since been extended to other sectors as well.

In summary, the Ghanaian legal landscape has grown considerably to better protect children from harm. However, some gaps remain in building strong bridges between the departments hosting various initiatives in protecting children, and translating policy into law, and law into practice.





6.2. Existing structures providing children and rights-holders access to remedy

This section reviews current structures available to rights-holders (including children) to raise complaints, provide child protection and access to remedy. Drawing on the International Cocoa Initiative's (ICI) Social Protection Mapping Study (SPMS)²³ and research, delineate between state-based structures and non-state-based structures. Issues of accessibility and other challenges that exist in relation to children's use of these reporting channels are further discussed below.

6.2.1. State-based structures

Ghanaian state-based grievance mechanisms are run by various statutory bodies that hold oversight responsibility for child protection, including child labour, including:

- ✦ The Ministry of Gender, Children and Social Protection (MoGCSP)
- ✦ The Commission on Human Rights and Administrative Justice (CHRAJ)
- ✦ Domestic Violence and Victim Support Unit (DOVVSU) of the Ghana Police Service
- ✦ Ministry of Labour, Jobs and Employment
- ✦ The Ghana Education Service (GES) under the Ministry of Education
- ✦ The Ghana Health Service (GHS) under the Ministry of Health
- ✦ The National Commission for Civic Education (NCCE)
- ✦ The Judicial Service and the District Assemblies

The tables on the following page provides operational details of the grievance mechanisms. This table is not an exhaustive overview of the functions and responsibilities of each of the state-based bodies represented here but instead presents the most prominent systems that emerged from the workshops held with state-based organisations. Beyond statutory child protection bodies, other state agencies — such as the Ghana Cocoa Board (COCOBOD) and the Ministry of Food and Agriculture — also bear responsibility for safeguarding children in cocoa-growing communities. The latter Ministry has further decentralised its functions to the district level through the District Agricultural Development Units (DADUs), which play a key role in supporting child protection efforts locally.

These bodies invite children (or their representatives) to report violations, seek remedies, and some also hold duty bearers accountable, in line with the legal framework discussed above. Children and other rights-holders can raise complaints to state-based bodies through in-person reporting (or “walk-ins”) at designated offices or at social gatherings, such as at religious meetings and through helplines. Access to remedy is provided through support services, restitution, sanctions, or referral pathways, depending on the reporting channel and host. In addition, it seems that some of these state-based structures also actively raise awareness on child rights issues and undertake campaigns to advertise the entry points through which child rights issues can be raised. For example, there is evidence that both the Ministry of Gender, Children and Social Protection (MoGCSP), the National Commission for Civic Education (NCCE), and the National Commission on Human Rights and Administrative Justice (CHRAJ) have undertaken awareness campaigns to further children's rights and access to reporting channels.²⁴ It was not determined to what degree these campaigns can be considered accessible to children of all ages.



Tables follow on next page



The following tables summarises the state-based structures providing child protection and access to remedy:

STATE BODY
Ministry of Gender, Children & Social Protection (MoGCSP) – Department of Children
ENTRY POINTS
In-person reporting District Social Welfare and community development offices
Toll-free line and Helpline of Hope through the Single Window Citizen System Engagement (SWECS)
GRIEVANCE HANDLING
Case management processes (reports assessed, monitored and followed up) through the Social Welfare Information Management Systems (SWIMS).
REMEDIATION, REFERRAL OR SUPPORT
Remediation There is a gender-based violence grievance redress system (Orange Support Centre).
Referrals To courts for legal action and to other state bodies
Support Protective remedies (such as foster care, shelter, etc. for children)

STATE BODY
Commission on Human Rights and Administrative Justice (CHRAJ)
ENTRY POINTS
In-person reporting At national, regional or district CHRAJ offices
GRIEVANCE HANDLING
Investigation of complaints
REMEDIATION, REFERRAL OR SUPPORT
Remediation Mediation or settlement
Referrals

STATE BODY
Domestic Violence & Victim Support Unit (DOVVSU – Ghana Police Service)
ENTRY POINTS
In-person reporting Police/DOVVSU stations
Hotlines
GRIEVANCE HANDLING
Criminal investigations
REMEDIATION, REFERRAL OR SUPPORT
Remediation Such as prosecution and protective custody orders
Referrals To state bodies, such as Social Welfare for child protection support

STATE BODY

Labour Inspectorate (Ministry of Labour, Jobs and Employment)

ENTRY POINTS**In-person reporting**

Regional/district labour offices (complaint desk) and workplace inspections

**A toll-free line****GRIEVANCE HANDLING****Investigation****REMEDIATION, REFERRAL OR SUPPORT****Remediation**

Such as restitution (withdraw children from hazardous work) or sanctions/fines on offenders

**Referrals**

To DOVVSU or Social Welfare for follow-up

STATE BODY

Judicial Service (Family Tribunals & Juvenile Courts)

ENTRY POINTS**In-person reporting**

Tribunal clerks or Legal Aid

GRIEVANCE HANDLING

Receive, hearing and adjudicating the case

REMEDIATION, REFERRAL OR SUPPORT**Remediation**

Through sanctions, punishment in accordance with the law

STATE BODY

Ghana Education Service (GES)

ENTRY POINTS**In-person reporting**

Teachers, headteachers (at schools) or to GES district offices

GRIEVANCE HANDLING

Reports feed into Parents Teacher Associations (PTAs)/School Management Committees for case assessment

REMEDIATION, REFERRAL OR SUPPORT**Referrals**

To police/Social Welfare for abuse cases of children

**Support**

Counselling for children

STATE BODY

Ghana Health Service (GHS)

ENTRY POINTS**In-person reporting**

Hospitals, clinics, Community-based Health Planning and Services (CHPS) compounds, etc.

GRIEVANCE HANDLING

Case examination and documentation

REMEDIATION, REFERRAL OR SUPPORT**Support**

Such as medical treatment, Psychosocial support services

**Referrals**

To Social Welfare and DOVVSU for legal/protection action

STATE BODY

National Commission for Civic Education (NCCE)

ENTRY POINTS

In-person reporting
To local NCCE offices

GRIEVANCE HANDLING

Receive, assessment

REMEDiation, REFERRAL OR SUPPORT

Support
Such as counselling and warnings



Referrals
To CHRAJ, MoGCSP, or police

STATE BODY

Ghana Cocoa Board (COCOBOD)

ENTRY POINTS

In-person reporting
Cocoa health and extension officers

GRIEVANCE HANDLING

Receive and investigate at the district and local level

REMEDiation, REFERRAL OR SUPPORT

Support
Such as monitoring of cases



Remediation
Such as mediation



Referrals
Through sanctions (of perpetrators not victims)

STATE BODY

District Assemblies

ENTRY POINTS

In-person reporting
Social Welfare and Community Development, District Agricultural Development Unit, etc.

GRIEVANCE HANDLING

Receive and investigate at the district and local level, case management

REMEDiation, REFERRAL OR SUPPORT

Support
Such as monitoring of cases



Remediation
Such as mediation



Referrals
To higher-level state structures

STATE BODY

Judicial Service (Family Tribunals & Juvenile Courts)

ENTRY POINTS

In-person reporting
Tribunal clerks or Legal Aid

GRIEVANCE HANDLING

Receive, hearing and adjudicating the case

REMEDiation, REFERRAL OR SUPPORT

Remediation
Through sanctions, punishment in accordance with the law

Overall, the state-based grievance mechanisms can be considered to be **more reactive than proactive in nature**. As one civil servant observed: ***“Most of the grievance mechanisms we have in Ghana are designed in a way that children will report issues, but not someone identifying these issues.”*** In other words, the state-based bodies highlighted are available to receive child-rights issues, but do not actively seek them out. State-based mechanisms typically intervene after a complaint or rights violation in the cocoa growing community has occurred, focusing on investigation, resolution, and redress rather than prevention. While these mechanisms—such as DOVVSU, CHRAJ, MoGCSP and the courts—play an essential role in addressing reported cases, they often rely on individuals’ ability and willingness to report. The reactive nature of state-based grievance mechanisms partly reflects the legal and institutional foundations from which they draw their authority, as detailed in the review of Ghana’s framework on child labour.²⁵

6.2.2. State-based reporting structures: Barriers and opportunities in providing access to remedy for child-related risks

Findings indicate that state-based reporting structures are not always available or easily reachable within local communities and among children. For example, the Department of Children (under the MoGCSP) operates at the national and regional levels but has no presence at the district level. Added to this, social welfare and community development officers are present but often under-resourced and lack sufficient human capacity. The limited accessibility of state-based child protection reporting structures in local communities arises from a combination of geographical remoteness, resource and staffing constraints. Many respondents explained that even the presence of judicial or police offices in the community does not necessarily encourage frequent reporting, as these agencies are often seen as intimidating and unapproachable, especially from the perspective of a child (see [Chapter 7](#)).

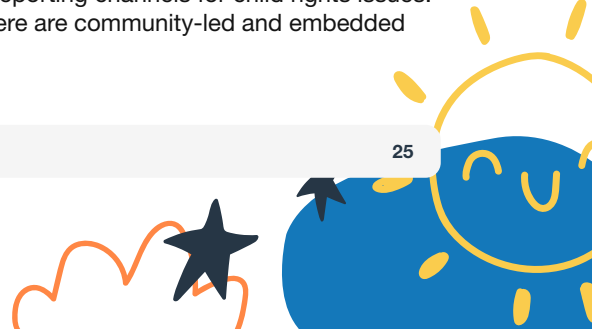
These factors make it difficult for children or parents to safely and effectively report child rights risks locally, especially in rural areas where child rights risks are high. This limited accessibility was expressed by most community members. One male farmer remarked, ***“In this community and other cocoa-growing communities that are remote, there are no police or social welfare and community development officers here to report issues unless we travel to the town, and we often lack the resources to do so.”***

Moreover, as state-based structures are often governed by bureaucratic processes, they often miss the opportunity of supporting reported cases to avoid further harm or escalation. For example, some child-related issues are not always deemed serious enough to be recorded in the state case management system SWIMS. This is important and also related to a limited capacity to respond. If, for example, the number of social workers is limited, then it’s not surprising that cases deemed “more severe” such as sexual abuse or violence are prioritized over family child labour. There is therefore an opportunity to better link state-based organisations with locally embedded reporting structures that are more culturally attuned to communities. The Inter-Sectoral Standard Operating Procedures for Child Protection and Family Welfare, developed by UNICEF for the Ministry of Gender, Children and Social Protection (Department of Children), provides an opportunity to better integrate the divergent state services working on child protection and guides the referral pathways to the right state-based support services.²⁶

6.2.3. Non-state-based structures for child protection and access to remedy

Beyond the state-based reporting channels, we identified several non-state-based reporting channels and informal structures. Again, these structures are not comprehensive of all available channels in Ghana to report child-related issues, but instead present the key structures that emerged within the scope of the study. In many communities across Ghana, traditional structures play a central role in safeguarding children. These structures typically include children and rights-holders approaching chiefs, queen mothers, elders, and Unit Committee members with child-related issues. Chiefs and elders are highly respected authority figures in local governance structures. They mediate disputes, including those involving child protection, and are often the first point of contact for families with concerns about children. Queen mothers, on the other hand, hold a unique and influential role in many Ghanaian communities, particularly regarding women, children, and family welfare. They are often responsible for advising on family and social matters, including safeguarding the rights of girls and children. Finally, Unit Committee Members represent the community and are tasked with linking residents to government programs, including social protection or child welfare initiatives.

In addition to these local community leaders, community members also prefer to turn to faith-based leaders (such as pastors and Imams), peers, grandparents and parents with child-related issues. Particularly influential were child rights clubs and parents’ and teachers’ associations in providing informal reporting channels for child rights issues. Lastly, there are community-led and embedded



structures for child protection, often initiated by businesses or NGOs/CSOs, such as Child Labour Monitoring and Remediation Systems (CLMRS), Community Child Protection Committees (CCPCs), and Access and Address Committees. These are often industry-led and supported by specialised civil society actors such as the ICI, Child Rights International, and Roots Link Africa. Up to 40% of Ghana's 850'000 cocoa farming householders are covered by these industry-led initiatives.

The following tables summarises the informal and non-state-based structures for child protection and access to remedy:

INFORMAL/NON-STATE ACTORS

Traditional leaders such as community chiefs, queen mothers and elders

ENTRY POINTS



In-person reporting

OPERATIONAL NOTES

Receive, call a meeting with perpetrator to mediate to address the issue

ACCESS TO REMEDY

Warning or caution (for perpetrators) and referral to state structures where need be (victims/survivors)

INFORMAL/NON-STATE ACTORS

Religious leaders such as pastors and Imams

ENTRY POINTS



In-person reporting

OPERATIONAL NOTES

Receive, call a meeting with accused

ACCESS TO REMEDY

Counselling, spiritual support (prayer), mediation and referral to state bodies (for victims/survivors)

INFORMAL/NON-STATE ACTORS

Peers and family members such as friends, siblings and guardians (particularly mothers)

ENTRY POINTS



In-person reporting

OPERATIONAL NOTES

Peers often refer to trusted adults while trusted adults often mediate to address the issue

ACCESS TO REMEDY

Dialogue, awareness raising, negotiation and referral to CCPCs and state structures where necessary (for victims/survivors) and warning for perpetrators

INFORMAL/NON-STATE ACTORS

Clubs and associations

ENTRY POINTS



In-person reporting

OPERATIONAL NOTES

Clubs document and often mediate to address the issue

ACCESS TO REMEDY

Awareness raising, advocacy and referral to CCPCs and state structures where necessary (for victims and survivors)

INFORMAL/NON-STATE ACTORS

NGOs / CSOs

ENTRY POINTS



In-person reporting



Local offices

OPERATIONAL NOTES

Case intake, documentation, needs assessment

ACCESS TO REMEDY

Mediation, psychosocial support, counselling, provision of basic needs and referral to state bodies

INFORMAL/NON-STATE ACTORS

Industry-led initiatives

ENTRY POINTS



In-person reporting

Community facilitators, Community Child Protection Committees (CCPCs) and project managers



Toll-free numbers

OPERATIONAL NOTES

Community monitors, Child Labour Monitoring and Remediation Systems (CLMRS); record cases, mediation (especially, with the case of CCPCs)

ACCESS TO REMEDY

Mostly referrals to company headquarters except CCPCs that often refer to state structures where necessary and also warn and caution perpetrators

Based on interviews with local communities, traditional/local leaders, and children, these non-state-based channels act as first points of contact to report child-related issues, given that most of the communities visited do not always have access to the state-based structures. These informal and formal reporting structures **play a critical role in closing the gap** between communities and children and state-based structures.

The data suggest that, for many children, non-state mechanisms often provide more practical access to support, as they tend to be locally embedded, trusted, and culturally attuned. We describe the non-state mechanisms as culturally attuned because they operate within local social norms, use familiar languages, and engage trusted community figures, making children and families more willing to access support compared with formal state agencies. As one farmer explained in the context of the Community Child Protection Committees: ***“The CCPC members are in the community with us, we feel their presence, and they are easy to access in the community.”***

The research suggests Community Child Protection Committees (CPCs) are gaining prominence in cocoa-growing communities. The CCPCs are locally driven structures rooted in community organisation. Participants described CCPCs as accessible, responsive, and culturally aligned with community practices, allowing them to play a growing role in actively identifying and addressing child protection issues at the local level. For many respondents, the CCPCs represent the main avenue for reporting child rights violations. While overall reporting remains limited, the study suggests that the committees are playing an important role in resolving the cases they receive and/or identify. As one farmer in a focus group discussion noted: ***“In this community, cases such as child abuse at home and on the farm that have been reported to the CCPCs have been resolved swiftly and peacefully.”***

The reporting patterns identified in the study are visualised in Figure 2 on the following page.



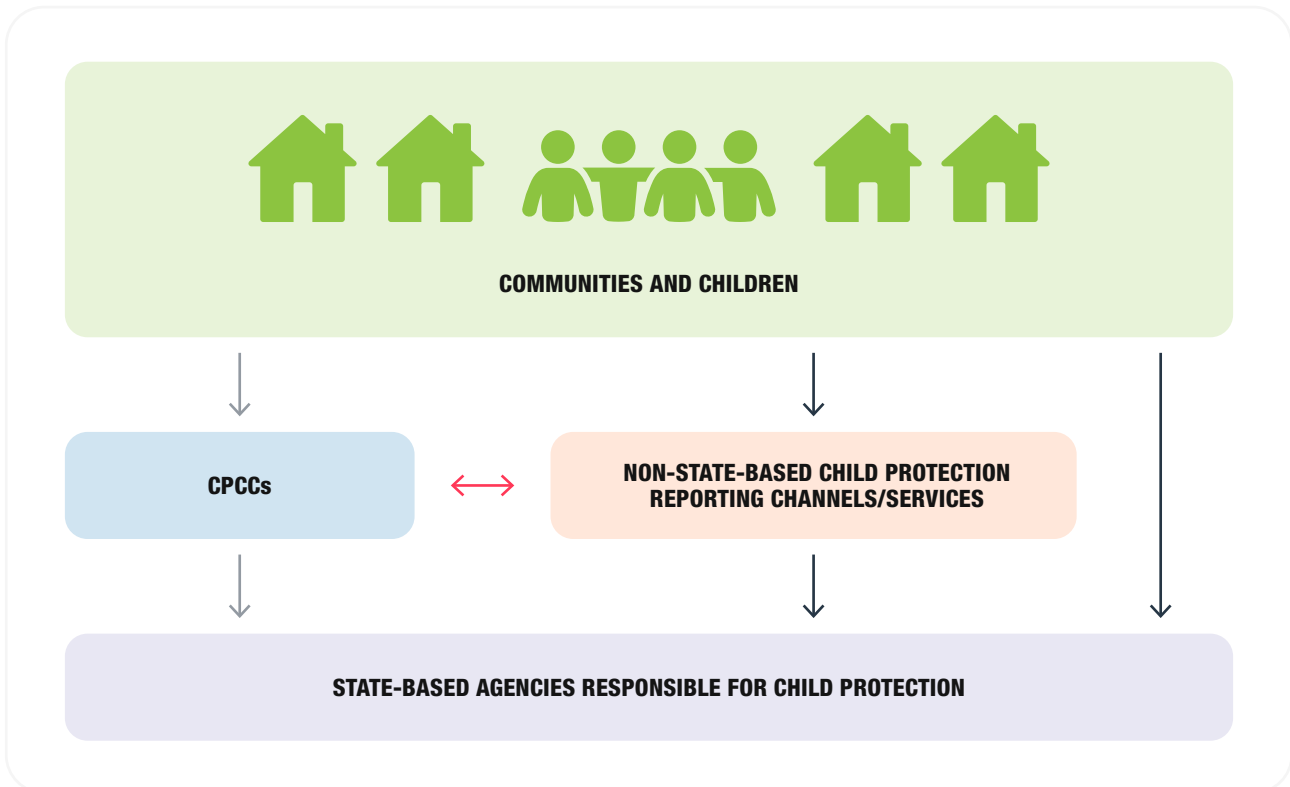


Figure 2: The diagram presents the study's key finding: most community rights-holders, including children, tend to report concerns through community-based or non-state structures—most commonly CCPCs, traditional leaders, or parents who escalate matters to the CCPCs—while reports made directly to state-based mechanisms are rare. Although CCPCs and other non-state structures may refer cases to state-based mechanisms when issues cannot be resolved locally, there is limited accountability and oversight regarding how reports are handled and how victims are safeguarded.

6.2.4 Non-state-based reporting structures: Barriers and opportunities in providing access to remedy for child-related risks

From the research undertaken in the two communities in scope, the Community Child Protection Committees (CCPCs) seemed to function as a central hub within the local child protection system. CCPCs do not exist in all communities and there is very poor knowledge of how many communities have functioning CCPCs. The research focussed on regions where there are active CCPCs but this should not be extrapolated to other regions. Among the children who were aware of the CCPCs, perceptions were generally positive. Most community members viewed the committees as approachable and trusted structures that promote schooling and discourage child labour. The CCPCs are also directly linked to a range of non-state structures and informal channels, such as NGOs, community associations, religious institutions, and family- or peer-based support networks. Most of these non-state actors refer cases to the CCPCs and, in many instances, form part of their broader composition, illustrating a web of community-based collaboration.

Most notably, CCPCs are community-owned and managed. While NGOs such as Care International, in partnership with companies such as Cargill and Mondelez, initially supported their establishment, our findings indicate that the communities themselves have taken ownership of these structures. This sense of local ownership reinforces the legitimacy and trust of the CCPCs. In other communities, the CCPCs were set up as part of the ILO-driven ACCEL Project, particularly Bibiani. The project is supported by the Ministry of Foreign Affairs of the Netherlands, in partnership with the Ministry of Labour, Jobs and Employment of Ghana, and is specifically aimed at building the capacity of the CCPCs.

CCPCs often act as the bridge between state-based mechanisms and non-state-based/informal mechanisms. The CCPCs do not operate in isolation but are (to some degree) integrated into Ghana's legal frameworks that have been implemented to address child labour in Ghana since 2000 (see 6.2 on the legal landscape).²⁷ For example, the National Child Protection System (NCPS), which connects community-level

initiatives with district, regional, and national structures, is linked to the CCPCs. In practice, CCPCs serve as the first point of contact at the community level, referring (*in theory*) reported cases to the District or Municipal Child Protection Committees (DCPCs/MCPCs). These district-level bodies, in turn, coordinate with Regional Child Protection Committees and ultimately link to national institutions. Although this vertical coordination does not always occur for all reported cases, it is intended to enhance both the visibility and institutional legitimacy of CCPCs within communities, strengthening their role as an essential component of the broader child protection framework.

However, the duplication of CCPCs within certain regions appears to be both an indication of their widespread presence and a potential risk for fragmentation, competition, and confusion. For example, in one cocoa-growing community, respondents explained that: ***“An attempt by another organisation to establish a new CCPC, despite the presence of an existing one, is not ideal.”*** This situation appears to stem either from a lack of community awareness about the existing committee or from the perception that cocoa companies—particularly Licensed Buying Companies—are expected to establish their own structures. Such instances of duplication seem less a result of deliberate overlap and more a consequence of information gaps, limited visibility of existing mechanisms, and company-driven expectations within the child protection landscape.

Moreover, the National Child Protection Committee (NCPC), alongside its regional district and regional counterparts, could be better leveraged to support CCPCs. They provide a ready-made institutional framework through which community-level mechanisms such as the CCPCs can be supported, monitored, and legitimised. As pointed out by a government official, ***“The CCPCs draw their power from DCCPCs/MCPCs. They also often ask for guidance and direction from DCCPCs/MCPCs and are expected to relay information to the DCCPCs/MCPCs.”*** Supporting these vertical linkages would enable grievances identified at the community level to be systematically referred, tracked, and addressed through formal state systems.

The DCCPCs and MCPCs should be strengthened and institutionalised to provide technical supervision, uphold confidentiality, and connect with national-level databases and social welfare services. This could be done through the current revision of Ghana’s Children’s Act, providing these committees a solid legal and policy foundation for a credible and sustainable child protection mechanism.

Additional challenges for CCPCs include:

- No/poor financial incentives for committee members (particularly in terms of transport)
- Limited organisational commitment/motivation to partake in the committee;
- Limited resources and authoritative power
- Frequent transfer of experienced personnel, part of the DCPCs that receive and handle complaints from the CCPCs
- Power dynamics within and between committees
- A tendency for referred cases to be handled individually rather than collectively, which limits institutional learning and accountability in the handling of reported issues
- Weak engagement from representatives of statutory bodies that form part of the DCPCs/MCPCs;
- The functioning of the DCPCs or MCPCs—structures that form the immediate institutional link to the CCPCs—also weakens the overall system.

This chapter has provided an overview of the state-based and non-state-based reporting structures that emerged most strongly in the scope of the research undertaken for this study. The overview highlights the extensive efforts made in recent years to strengthen Ghana’s remedy ecosystem, both through state-based bodies and industry-led initiatives. However, it remains evident that greater integration across the various initiatives is needed, alongside better efforts to leverage the accessibility of community-level reporting structures.

Furthermore, to address the persistent risks of retaliation and stigmatisation that often accompany reporting within communities, there is a need to establish a localised and independent avenue through which children can safely raise concerns and receive full support throughout the process. These recommendations are explored in detail in **Chapter 8**. Before turning to them, it is important to examine the barriers that children face in reporting risks, particularly those shaped by socio-cultural factors.

7. Barriers Children Face in Reporting Risks

One of the most pressing issues related to enabling child rights through access to remedy is related to the local socio-cultural dynamics. In a study done by UNICEF in 2021, it is reported that traditionally, Ghanaians view the protection of children from a collectivist perspective, whereby the wider community is responsible and accountable for protecting vulnerable people such as children.²⁸

However, factors such as a decline in the quality of life, increased poverty, inequality and urbanisation are eroding the responsibility for social protection as embedded in local communities. This study found that the local community and its actors are still very much considered as *the* focal point through which interventions should be implemented in order for them to be successful. Yet local dynamics can also inhibit the ability of children to access grievance channels and remediation. These community dynamics include how children are perceived and defined in the community.

Most of the participants engaged in this study emphasised that children cannot report issues affecting them or others due to traditionally held beliefs about the “place” of a child. Children reporting issues such as child labour are seen to disobey their parents or guardians, to bring their family name in disrepute, and transgress strong social borders of what is considered to be “appropriate behaviour” for a child. In short children reporting issues are seen as deviant. In community interviews, participants noted that children do not report issues for fear of being shouted at, victimised, threatened (especially by perpetrators), beaten, or accused of being disrespectful. Furthermore, research highlights that cultural norms that expect children to be obedient recipients of adult decisions hinder children’s participation in the child protection process.²⁹ Moreover, children’s loyalty to their families can influence their willingness to report child labour or exploitation, particularly when parents are struggling to provide basic needs. In short, how can a child report a struggling mother and father for child labour? Although communities must be sensitised to the long-term benefits of providing their children access to education, it often remains very difficult when immediate needs are overwhelming in the face of poverty.

“Children reporting issues such as child labour are seen to disobey their parents or guardians, to bring their family name in disrepute, and transgress strong social borders of what is considered to be “appropriate behaviour” for a child.”

Specific barriers that emerged from the workshops and field research in reporting child-rights issues are summarised below:



SOCIAL NORMS AND A LACK OF CONFIDENCE

The lack of confidence in reporting channels – particularly state-based channels – and social norms keep community members, particularly children, from reporting issues. In most cocoa-growing communities in Ghana, issues related to child labour, neglect, or abuse are often treated as private family matters. Reporting child-related risks can therefore be perceived as betraying the community or bringing shame to one's family. As one participant in a focus group discussion commented, ***“In this community, people are afraid that if they report, everyone will know, and they will say you disgraced your own family.”*** A child participant added that: ***“If a child speaks up, the parents may be angry. So, most children just keep quiet.”*** Studies confirm that cultural expectations around family authority, privacy, and maintaining family honour reinforce patterns of silence, which in turn exacerbate the underreporting of child-related risks.³⁰ Community members reported that girls in particular are discouraged from speaking up, and communities may also discourage children from reporting thinking that they do not have the capacity.



LACK OF SAFEGUARDING PROCESSES

Another significant challenge identified was the lack of sufficient safeguarding mechanisms for individuals who report child-related risks. Respondents explained that fear of retaliation, social exclusion, or damaged relationships often discourages both adults and children from reporting child rights violations. As one male farmer observed: ***“Threat from perpetrators stops children and their families from reporting abuses to the CCPC or elders in the community.”*** Similarly, one female farmer pointed out that ***“Sometimes even when a child tells us something, we are afraid to take it forward because of fear of being neglected by friends in the community.”***



LACK OF TRUST IN REPORTING STRUCTURES

A recurring theme across the interviews was a lack of trust in existing child protection systems, both state and non-state-based mechanisms. Many respondents questioned the effectiveness and transparency of the entry points as well as the handling of cases. As one male farmer commented,

“Due to the fact that sometimes there's no help or solution when reports are made, children or families do not see the need to request help. Also, there is a lack of trust in issues likely to be resolved making it difficult for people to open up or share their problems.” Similarly, another female farmer explained that: ***“Sometimes when you report an issue to the elders in the community or the CCPC, they do not act on it, so people don't trust the system to resolve the issue.”*** These perceptions of inaction are eroding confidence in the existing mechanisms as a means of resolving child-related risks.



HOTLINES ARE NOT OPERATING 24HOURS, AND MISUSE OF HOTLINES

A key concern raised by participants regarding helplines is the issue of their lack of availability for the full 24 hours, which significantly limits their accessibility to children and families. Respondents explained that helplines and reporting offices often operate only during regular working hours, leaving little room for emergencies or cases that occur outside these times. This restricts both timely reporting and responsiveness to urgent child protection issues. As one participant in the workshop stated: ***“In Ghana here, there's no one to answer the hotline when you call in the evening or weekend.”*** Another participant added that: ***“Most often, the lines are busy, or [attendants] have left the desk.”*** Another challenge mentioned by several respondents was the misuse of reporting hotlines through prank calls, which further strains the effectiveness of child protection mechanisms. As one participant in a workshop mentioned: ***“Sometimes we receive calls that turn out to be jokes and pranks.”***

Additional barriers to children and community-based rights-holders include:

- Lack of anonymity and confidentiality when reporting issues
- Children fear losing their home or shelter
- Low awareness among children and communities about child rights issues
- Low awareness of the available means through which issues can be reported
- Poor engagement of children and communities in the design and implementation of reporting structures
- Poor implementation of remediation strategies that fail to restore children's rights and address systematic drivers and root causes such as poverty and socio-cultural norms
- Traditional folktales discourage children from talking about events that might impact their families

- Children face literacy barriers and cannot access reporting channels or information regarding child rights
- Faith-based organisations (such as Sunday school) encourage children to obey their parents “no matter what”

Considering these systematic barriers and challenges to children reporting within the socio-economic context of Ghana, an effective grievance mechanism must tackle both barriers to access and capacitate communities to increase child protection. The gaps also illustrate a broader area for improvement in the child protection ecosystem—while mechanisms exist for identifying and responding to child risks, safeguards for those who raise concerns remain weak or absent (especially in terms of implementation). Most notable is the gap between locally embedded structures and state-based mechanisms.

One of the key paradoxes that would have to be resolved for the implementation of an effective child-friendly grievance mechanism is challenging the traditionally held beliefs of children while simultaneously leveraging local community support networks, without which interventions will fail.



In summary, the existing gaps and barriers identified that a potential child-friendly grievance mechanism needs to address to be effective include:

- 1 Children do not perceive most existing structures as child friendly and therefore rarely report concerns
- 2 Poor linkages between community-based reporting structures and state-based structures
- 3 Staff responsible for handling child-related issues are not professionally trained in handling children and child rights
- 4 Inadequate access for children to report confidentially and anonymously
- 5 Children-related issues are not always addressed through remediation plans that comprehensively tackle underlying root causes to prevent recurrence and promote children's long-term well-being
- 6 Poor support for community-based structures in terms of skills, resourcing and institutional support
- 7 Poor integration of the various structures receiving child-related issues and looking after child welfare and child protection
- 8 Poor monitoring and evaluation of child-related issues
- 9 Inadequate awareness campaigns that actively address the root causes of child rights issues, including poor knowledge of child rights and reporting channels
- 10 Lack of enforcement by state services on child abuse and exploitation

In the next chapter, the feasibility criteria for a potential child-friendly grievance mechanism are detailed, which address the barriers and challenges children face in being heard and accessing remedies.

8. Proposals for a Child-Friendly Grievance Mechanism

8.1 Introduction

This study has shown that there is room for improvement to help children in Ghana to raise grievances about issues affecting them and receive adequate support in response. However, a grievance mechanism alone cannot fully address the root causes of human rights abuses. Any grievance mechanism should be complemented by coordinated efforts to tackle underlying issues such as poverty, inadequate access to quality essential services, incomes below the “living income” threshold, climate change and broader socio-political vulnerabilities.

Based on best practice guidance and the research conducted for this study, Partner Africa suggests the establishment of a Child-Friendly Grievance Mechanism (CFGM) called a **Child Rights Office**. The Child Rights Office is conceived not as a standalone replacement for existing systems, but as a strategic “missing piece”: a child-centred structure designed to strengthen coordination, accountability, and accessibility across existing child protection, grievance, and case management mechanisms. At the heart of the CFGM is the creation of an independent, locally based Child Rights Office, mandated to receive, refer, and follow up on child-related grievances and rights violations. While this office represents a new institutional structure, it responds to limitations in existing mechanisms for children to raise concerns, which, despite being trusted in principle, often struggle to guarantee anonymity, suffer from limited capacity, and operate grievance channels with a broad community focus that makes them insufficiently child-specific. This model is not framed as the creation of a parallel system, but is intentionally designed to leverage and enhance existing government and non-governmental systems, standard operating procedures, and referral pathways. The Child Rights Office would be overseen by an independent **Governance and Oversight Structure**, responsible for ensuring accountability,

integrity, and adherence to child-rights principles. It is suggested that the Governance Structure comprises of representatives from the government, NGOs, the private sector and rights-holders. However, an alternative model to the Child Rights Office is presented below as a more feasible and proportionate approach to addressing CFGM-related risks within the current context. While the Child Rights Office model offers a comprehensive framework, it was not put forward as a primary recommendation due to its comparatively high cost, which was viewed as a limiting factor for implementation. Feedback from stakeholder consultations highlighted concerns regarding affordability and sustainability, leading to a preference for a model that is more practical and scalable. The full proposal for the Child Rights Centre can be found in Annexure C. An alternative, albeit less comprehensive, would involve strengthening the capacity of existing community-based structures to more effectively identify, address, and remediate child rights violations. While this approach may be more feasible in low-resource settings, it is essential to acknowledge that reliance on community-based mechanisms can limit children’s ability to raise concerns anonymously, which may reduce accountability, accessibility, and uptake, particularly in sensitive cases. Furthermore, at a minimum, there is a clear need to improve coordination both within and across communities by strengthening linkages among community-based structures. Furthermore, enhanced integration between non-state mechanisms and formal, state-based child protection systems is essential to ensure effective referral pathways, accountability, and accountability of responses.

8.2 Recommendations in formalising and strengthening community-based structures to improve access to child friendly grievance mechanisms

The findings highlight that Community Child Protection Committees (CCPCs) already occupy a central and trusted role within community-level child protection systems. Their strengths lie in their accessibility, community ownership, and embeddedness within local social networks, making them a natural entry point for children to raise concerns. However, to function as an effective and child-friendly grievance mechanism, CCPCs must not only be strengthened operationally, but also aligned with 7 effectiveness principles of the UNGPS — namely legitimacy, accessibility, predictability, equity, transparency, rights-compatibility, continuous learning, and child-centred engagement. The recommendations below address these principles, ensuring that CCPCs are not only functional, but also trusted, safe, and responsive mechanisms for children.

Strengthening Coherence and Clarity of CCPC Structures (Legitimacy and Trust)

The duplication of CCPCs within communities undermines trust, creates confusion, and weakens accountability. For CCPCs to be perceived as legitimate grievance mechanisms, children and communities must clearly understand which structure is responsible for receiving and handling grievances. Establishing a “one CCPC per community” principle, supported by a district-level registry, is therefore important. External actors should be required to strengthen existing committees rather than create parallel ones. Legitimacy can be further reinforced by clearly defining roles and responsibilities, ensuring that designated individuals within CCPCs are accountable for the fair and confidential handling of child-related grievances. Importantly, oversight from district-level structures should be formalised to ensure impartiality, while safeguards must be introduced to prevent interference from adults—such as parents or community leaders—in the reporting and handling of children’s grievances.

fairly and consistently. Regular coordination meetings between CCPCs and district actors should also be institutionalised to reinforce accountability and strengthen system coherence.

Enhancing Rapid and Inclusive Communication Channels Urgent Cases (Accessibility and Protection)

Delays in communication significantly reduce the effectiveness of CCPCs, particularly in urgent or high-risk situations. To ensure accessibility and responsiveness, children and CCPC members must have access to immediate reporting channels. Introducing multiple access points—such as mobile phone-based communication (calls, SMS, messaging platforms)—can provide children with safer and more flexible options for reporting. These channels should be designed with consideration for different barriers, including literacy, gender, disability, and fear of retaliation. Clear protocols for urgent case escalation must also be established, ensuring that children are protected from harm and that responses are timely and appropriate. CCPCs also indicated the need for transport to address reports in a timely manner.

Improving Integration with District Systems (Predictability and Accountability)

The inconsistency of referrals between CCPCs and district-level bodies limits the predictability and reliability of the grievance process. For children to trust the system, they must be confident that reporting will lead to action. Clear, standardised referral pathways should therefore be established, including defined timelines for each stage of the process and clarity on expected outcomes. District-level focal persons should be designated to ensure that all referred cases are acknowledged, tracked, and responded to. These measures enhance predictability and ensure that grievance processes are conducted

Promoting Consistent Case Management and Shared Learning (Transparency and Continuous Improvement)

The absence of structured case management limits both transparency and institutional learning. It also means that local dynamics can interfere with the handling of cases, such as conflict of interest. To address this, CCPCs should adopt standardised procedures that clearly outline each stage of the grievance process, from intake to resolution. Children should be kept informed of the progress of their cases in a child-friendly and safe manner (especially

protecting them from retaliation and further harm), ensuring transparency while protecting confidentiality. At the same time, anonymised case discussions within CCPCs can support collective decision-making and strengthen accountability. Data on cases should be systematically collected and analysed to identify patterns, improve responses, and demonstrate the effectiveness of the mechanism. This contributes to building trust and ensures that CCPCs function as a source of continuous learning.

Enhancing Child-Friendly Access and Inclusive Participation (Accessibility and Equity)

Despite their community presence, CCPCs are not always fully accessible or inclusive for all children. Barriers such as stigma, fear of retaliation, gender norms, and literacy challenges must be actively addressed. CCPCs should aim to provide multiple, child-friendly access points and ensure that children of different ages, genders, and backgrounds are aware of how to access them. Special consideration must be given to vulnerable groups, including very young children, children with disabilities, and those at risk of victimisation. Awareness raising programmes should leverage existing leadership structures such as school teachers and elders to ensure that messaging around child protection and child rights are culturally sensitive and endorsed by local leaders. In addition, children should be meaningfully involved in the design and ongoing evaluation of CCPC processes, ensuring that the mechanism reflects their needs and preferences. Providing access to trusted intermediaries or advisors (e.g., trusted adults such as school teachers or even older peers) can further support children in navigating the grievance process on fair and informed terms.

Strengthening Resourcing and Incentive Structures (Sustainability and Accessibility)

Limited resources and lack of incentives continue to undermine the effectiveness and sustainability of CCPCs. These constraints directly affect accessibility, as committee members may be unable to respond promptly or consistently. Addressing this requires targeted, low-cost support, including transport stipends, communication allowances, and basic materials. Non-financial incentives—such as recognition, certification, and access to training—can further enhance motivation and commitment. Ensuring that CCPCs are adequately resourced, even at a minimal level, is critical to maintaining their accessibility and reliability as grievance mechanisms.

Expanding Access to Quality Services and Effective Remediation Pathways (Legitimacy and Rights-Compatibility)

The limited formal recognition of CCPCs weakens their authority and their ability to ensure rights-compatible outcomes. Strengthening their institutional legitimacy requires clearer legal and policy backing, particularly through integration into national frameworks such as the Children's Act and the Social Protection Bill. This should include clearly defined mandates, reporting obligations, and alignment with child rights standards. Ensuring that all outcomes and remedies are consistent with internationally recognised child rights principles is essential to maintaining the integrity and effectiveness of the mechanism.

Reinforcing the Effectiveness of District-Level Systems (Accountability and System Effectiveness)

The effectiveness of CCPCs is closely linked to the performance of district-level structures. Weak engagement, limited capacity, and high staff turnover at this level undermine the overall system. Strengthening district-level accountability is therefore critical. This includes assigning clear responsibilities, ensuring consistent participation of statutory actors, and introducing basic performance monitoring systems. Tracking response times, case outcomes, and user satisfaction—particularly from children—can help ensure that the system remains accountable and effective.

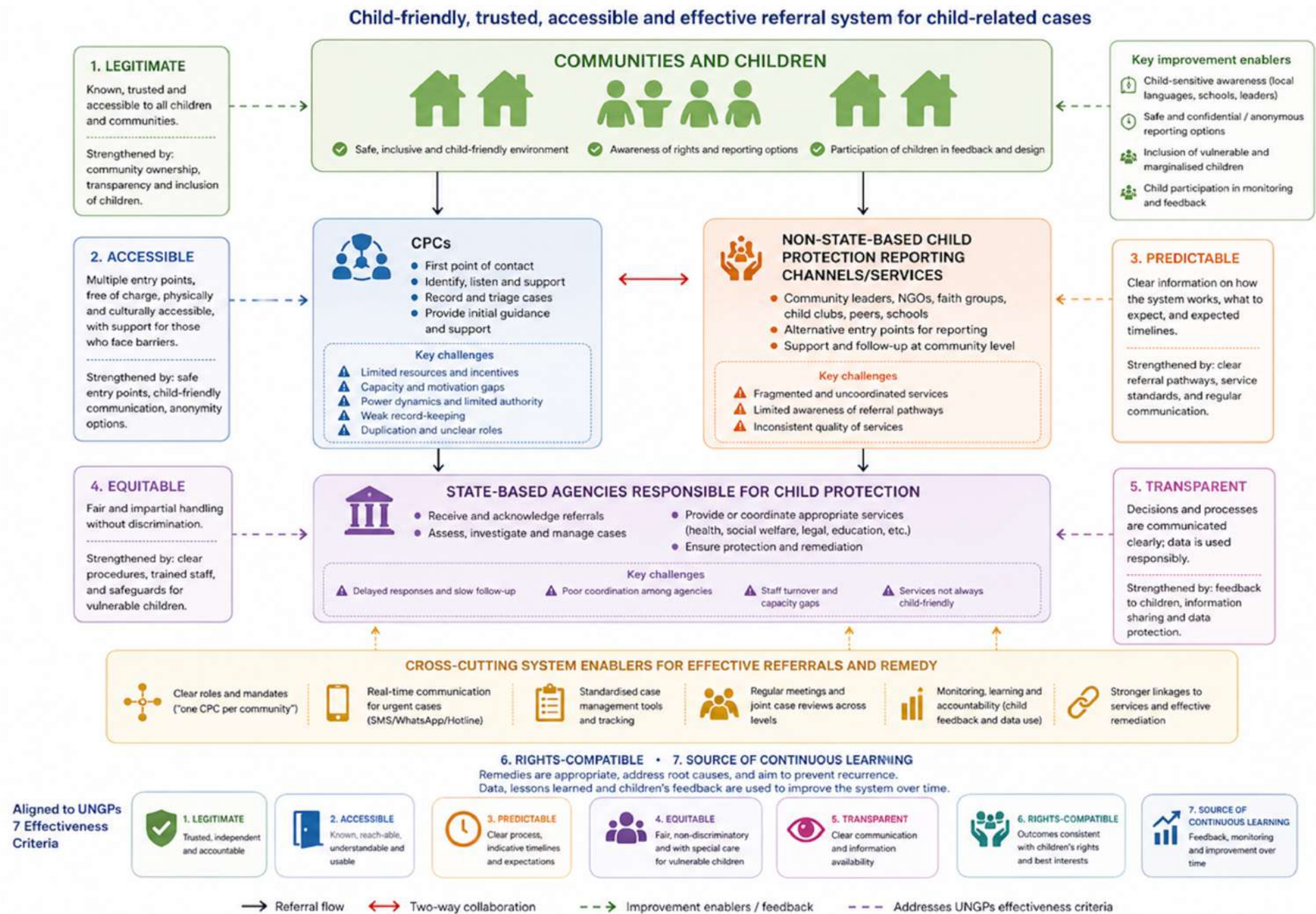
Building Stronger Institutional Mandates and Authority for CCPCs (Rights-Compatibility and Equity)

For CCPCs to function as effective grievance mechanisms, reporting must lead to meaningful and rights-compatible remediation. This requires strong and consistent linkages to services such as social welfare, health care, legal aid, and psychosocial support. Clear referral pathways should be established, and district-level service mapping should be conducted to ensure that appropriate support is available. CCPCs should also follow up on referred cases to ensure that children receive the necessary assistance and that outcomes are sustained. This ensures that the mechanism not only identifies harm but also contributes to restoring children's rights and well-being.

8.3 Final reflections on strengthening existing community-based structures

Strengthening CCPCs along the lines outlined above represents one practical direction that could be considered in a resource-constrained environment. By building on existing community-based structures and incrementally aligning them with core effectiveness principles — such as legitimacy, accessibility, predictability, equity, transparency, and rights-compatibility — it may be possible to enhance their role as entry points for reporting and pathways to remedy without requiring significant new institutional investment.

However, the extent to which these measures can be successfully implemented will depend on broader system factors, including the functionality of district-level structures, the availability of minimal resources, and the degree of policy and institutional support. As such, this approach should be viewed as a feasible, incremental option rather than a comprehensive solution. It may serve as a foundation for strengthening child protection systems over time, particularly if accompanied by ongoing monitoring, learning, and adaptation based on the experiences of children and communities.



■ Figure 3: The diagram shows how child protection cases move from communities to CCPCs and onward to state services, highlighting key gaps. Barriers to reporting, weak coordination, and limited resources disrupt effective referrals and responses. It also points to needed improvements, including clearer referral pathways, better communication, and more child-friendly reporting to ensure timely support.

9. Closing Reflections

This feasibility study found that establishing a child-friendly grievance mechanism in Ghana is both necessary and achievable, but only if designed with careful attention to the realities children face.

The study revealed a paradox at the heart of child protection in cocoa-growing communities: whilst children are acutely vulnerable to rights violations, the social norms that bind communities together—respect for elders, family privacy, and collective responsibility—often silence children's voices. Yet the study also demonstrates that communities are not resistant to change. The growing trust in Community Child Protection Committees, the willingness of traditional leaders to engage, and children's own clarity about what they need to feel safe all point to genuine opportunities for meaningful progress. The proposals set out in this report are anchored in community structures but connected to state systems, offering practical pathways to bridge this gap. It can provide children with accessible, trusted channels for remedy whilst respecting and leveraging local dynamics.

In summary, if the recommendation for a CFGM in this study is fully aligned with child friendly indicators and the UNGPs' effectiveness criteria for grievance mechanisms, it means that:

- Reporting mechanisms are increasingly trusted by children and communities, with simple indicators used over time to assess accessibility and confidence.
- Children's perspectives are more systematically considered in how reporting pathways are designed, communicated, and improved.
- CCPCs, supported by district-level actors, are better equipped to handle and refer cases in a manner that is sensitive to children's needs and circumstances.
- Safeguards are strengthened to reduce the risk of undue influence or interference from adults, helping to protect children's safety and autonomy.
- District-level structures play a more consistent role in supporting oversight, coordination, and fairness in how cases are managed and followed up.
- Reporting pathways are more visible and

accessible, with multiple entry points that are appropriate for children and adapted to local contexts.

- Greater attention is given to vulnerable and marginalised groups, with efforts made to reduce barriers to access.
- Confidentiality and protection from retaliation are more consistently upheld across the referral process.
- Communication with children is more age-appropriate and responsive throughout case handling and resolution.
- Basic data and learning mechanisms are introduced to track cases, identify gaps, and gradually strengthen system performance and trust.

Taken together, these shifts would support a more coherent and responsive referral system that is better able to connect community-level reporting with district-level services. While progress is likely to be gradual, strengthening existing structures such as CCPCs offers a pragmatic pathway toward improving access to remedy in a way that is grounded in local realities.

Ultimately, the effectiveness of this approach will depend not only on increased reporting, but on whether children are able to access timely, safe, and meaningful support, and whether responses contribute to addressing the underlying drivers of harm. This will require continued coordination and commitment across government, NGOs, private sector actors, and communities. In particular, there remains an opportunity for industry actors, including those in the cocoa and mining sectors, to support these efforts by investing in the strengthening of existing community and district-level systems rather than creating parallel mechanisms.

Most importantly, children must remain at the centre of access to remedy. Not as passive beneficiaries, but as active participants whose voices shape how protection is designed, implemented, and improved over time. Only then can Ghana build a child protection ecosystem that truly serves the best interests of its most vulnerable citizens.

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25. Hammond, A. F., & Dowuona-Hammond, C. (2025). A review of the legal, policy and institutional framework on child labour in Ghana. African Human Rights Law Journal, 25(1), 194–222. <https://doi.org/10.17159/1996-2096/2025/v25n1a8>
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28. Citizens' knowledge and perceptions about poverty, vulnerability rights, and social protection in Ghana: A Baseline Study – Report Commissioned by UNICEF, Ghana, May 2021. Accessible [here](#).
29. Manful, E., Cudjoe, E., & Abdullah, A. (2020). Towards child-inclusive practices in child protection in Ghana. Children and Youth Services Review, 119, Article 105594. <https://doi.org/10.1016/j.childyouth.2020.105594>
30. Ibid.
31. Access this document [here](#).

Annexure A: List of stakeholders engaged in this research study

PRIMARY STAKEHOLDERS (DIRECTLY AFFECTED / RIGHTS-HOLDERS)	
1	Children (including farmers or caretakers' own children, children from the family and children from the community)
2	Working children that are non-migrants
3	Migrant children and working children
4	Parents, caregivers and guardians
5	Smallholder farmers
6	Farming communities
DUTY-BEARERS (INSTITUTIONAL ACTORS)	
1	COCOBOD (Cocoa Health and Extension Division)
2	Social Welfare and Community Development
3	Commission for Human Rights and Administrative Justice
4	Labour Department
5	Ghana Education Office (national and district level)
6	Ghana Police Service Anti-Human Trafficking Unit and Domestic Violent and Victim Support Unit)
7	Ministry of Gender Children and Social Protection
8	Child Labour Unit
9	Minerals Commission
10	Ministry of Food and Agriculture and Department of Agriculture at the District Level
11	Traditional Authorities
12	Community based child protection volunteers/agents
13	License Buying Companies
14	Farmer cooperatives
15	Purchasing Clerks
16	Manufacturers (e.g., Mondelez) and Processors/Grinders
17	Ghana Immigration Service
SUPPORTIVE ACTORS (SERVICE PROVIDERS AND CIVIL SOCIETY ORGANISATIONS)	
1	ICI
2	Trade Unions (e.g. General Agricultural Workers Union)
3	UNICEF Ghana/Global
4	Child Rights International (Ghana)
5	The Remedy Project

Annexure B: Key indicators for Child-Friendly Grievance Mechanisms

Using extensive desktop research and input from internal and external expertise, the table below presents the indicators of the “7 effectiveness criteria” for grievance mechanisms as per the UNGPs in **child-friendly** terms:

Legitimate: Enabling trust from the stakeholder groups for whose use they are intended, and being accountable for the fair conduct of grievance processes;	• The grievance mechanism (GM) is be trusted by children and KPIs are available that ensures that the GM is trusted by children going forward. • Children are involved in the design of the GM and continuously are engaged for feedback on its functioning (monitoring). • There are responsible persons/committees/bodies made accountable for the fair conduct of grievance processes, with special accountabilities for the receiving and handling of grievances from children. • Processes are in place to ensure that parties (including parents, family members and other adults) refrains from interfering with the fair receiving and handling of grievances reported by children. • There is a formal and independent oversight structure with specific responsibilities related to ensuring the GM is accessible to children, and that children are protected when using the GM
Accessible: being known to all stakeholder groups for whose use they are intended, and providing adequate assistance for those who may face particular barriers to access;	• All children, irrespective of age, gender, ethnicity, religion, or region know about the GM. • The GM is publicised in ways that are accessible to children considering age-appropriate communication and awareness campaigns. • There are multiple access points that are suitable to children of different ages, genders, locations etc, and there is knowledge of which access points children are most likely to use • Special consideration in terms of accessing the GM is made for vulnerable children such as very young children, illiterate children, children with disabilities, children fearing retaliation or victimisation, children from ethnic minorities, children from very conservative smallholder backgrounds, children and girls • Adequate assistance is provided to children facing barriers to report grievances • Children are protected from retaliation and victimisation when raising grievances
Predictable: providing a clear and known procedure with an indicative time frame for each stage, and clarity on the types of process and outcome available and means of monitoring implementation;	• The GM considers children in all processes and outcomes available, including in implementation and monitoring • The GM provides clear and accessible information about its procedures in a format that is publicly available to children
Equitable: seeking to ensure that aggrieved parties have reasonable access to sources of information, advice and expertise necessary to engage in a grievance process on fair, informed and respectful terms;	• The GM ensures that children has reasonable access to sources of information (presented in a child-friendly manner), advice and expertise necessary to engage in a grievance process on fair, informed and respectful terms as appropriate • Children are adequately informed on how to use the mechanism in a child-friendly and accessible manner • Support is available that can provide children with external advice and these are trained in handling sensitive matters related to children sensitively and are respected and trusted

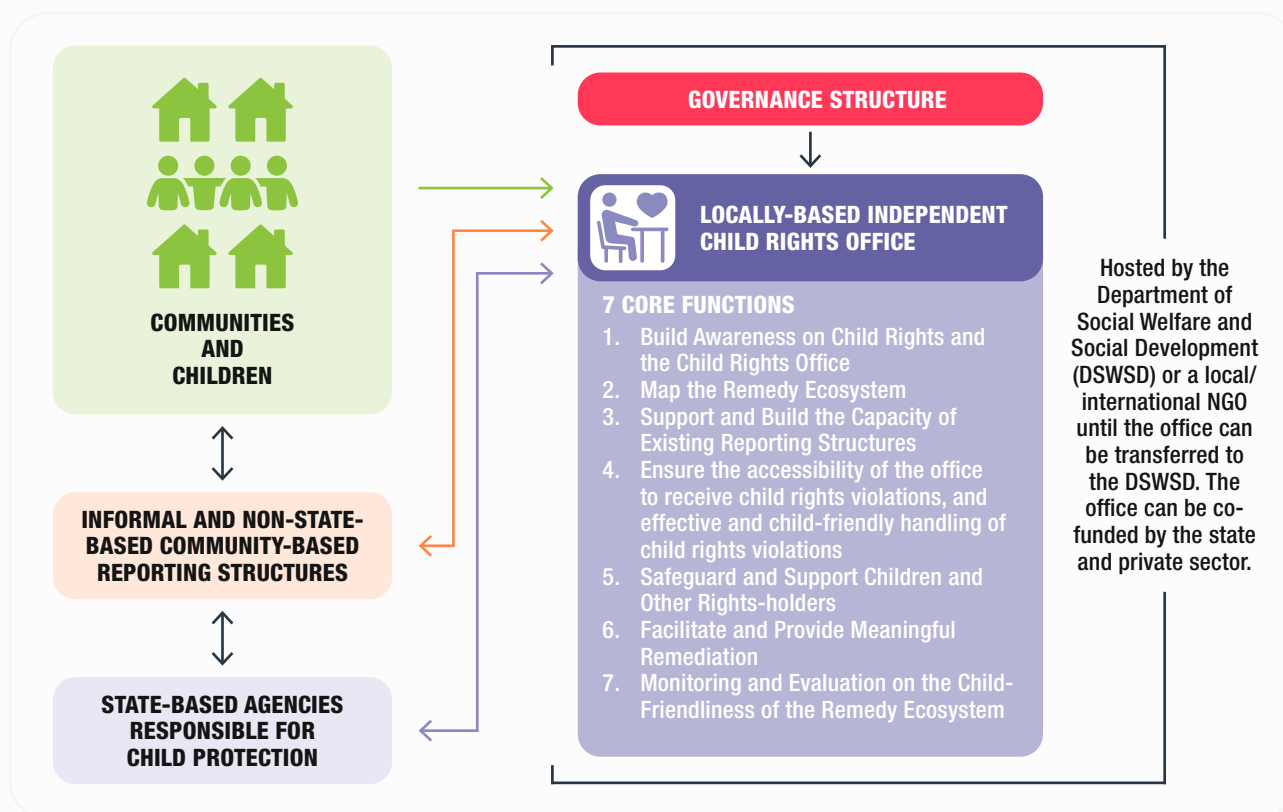
Transparent: keeping parties to a grievance informed about its progress, and providing sufficient information about the mechanism's performance to build confidence in its effectiveness and meet any public interest at stake;	• The GM keeps children informed of the progress of their grievance in a child-friendly manner that also protects children from further harm/victimisation • The mechanism demonstrates, in child-accessible ways, that it is effective, trustworthy, and able to protect and respond to children's concerns in their best interests. • Data is tracked and analysed to show publicly that the GM is working - specifically on child-friendly KPIs and can be trusted by children (e.g. statistics, case studies, detailed information about the handling of certain cases) • Information on the operational capacity of the GM is done in a way to protect user confidentiality, and especially children from retaliation and victimisation.
Rights-compatible: ensuring that outcomes and remedies accord with internationally recognized human rights;	• The outcomes and remedies of the GM accords with internationally recognised children's rights. • The procedures enable and ensure child rights-compatible outcomes. • The mechanism treats all complaints seriously, including those which do not represent allegations of child/human rights abuse.
A source of continuous learning: drawing on relevant measures to identify lessons for improving the mechanism and preventing future grievances and harms;	• The mechanism continuously identifies lessons for improving in terms of its accessibility to children and prevents future grievances and harms related to children • There is regular analysis of the frequency, patterns and causes of grievances, which is triangulated by data related to children's ages, locations, genders, ethnic background etc. • Meaningful indicators have been developed to assess the success of the child-friendliness of the GM. • Procedures are in place to enable feedback from potential/existing children using the GM. • Stakeholders and partners are engaged on the monitoring of the GM to ensure that it improves its child-friendliness over time based on trends.
Based on engagement and dialogue: consulting the stakeholder groups for whose use they are intended on their design and performance, and focusing on dialogue as the means to address and resolve grievances.	• Children are consulted on the mechanism's design and performance. • Children's perspectives are considered for public-facing aspects (e.g. choice of access points, modes of dispute resolution, transparency) • Child-appropriate dialogue is used as the means to address and resolve grievances. • Children are adequately supported in mediation and dialogue procedures. • Recourse to a legitimate, independent and child-friendly third party is possible.

Annexure C: Proposal for a Child Rights Office

This annexure details the best practice proposal for setting up a child-friendly grievance mechanism in Ghana, establishing a Child Rights Office. At a minimum, each centre should serve one district. We propose phased implementation approach, beginning with a pilot in a single district and scaling progressively to other districts identified as high-risk for child-related harms. This approach allows for learning, adaptation, and institutional strengthening prior to national expansion. Ideally, the Child Rights Office would be hosted within the Department of Social Welfare and Social Development (DSWSD). The DSWSD is widely regarded as one of the most child-friendly government departments and is already integrated into the SWIMS case management system, supported by child-appropriate standard operating procedures. Where immediate government hosting is not feasible, we envisage that a local NGO (or international NGO with local expertise) could initially host the Child Rights Office, with a planned transition of full responsibility to the DSWSD over time. Finally, the proposal recognises the importance of private-sector engagement, particularly from the cocoa and mining sectors, in supporting the funding of the office. Private-sector funding of district-level Child Rights Offices would provide a practical mechanism for companies to meet their human rights and child-rights due diligence commitments, including ensuring access to effective remedy for children and affected communities. The Child Rights Office should be headed by an experienced human rights expert with expertise in addressing and remediating child-related issues. The expert should be overseen by the Governance Structure and employed by the host. We suggest several core functions for the office, including integrating community-based structures with national structures (where applicable), while also monitoring reported cases and providing support to community structures on remediation, monitoring, and evaluation. The office should receive complaints and grievances from the existing community-based channels that are already operating in communities, as well as offer additional entry points for reporting, including directly approaching the office. Such entry points can include a hotline, trusted individuals, community committees, suggestion boxes, welfare offices and associate clubs, most of which are already in place.

Feasibility criteria and conditions of success for a child-friendly grievance mechanism

This section details the criteria and conditions of success for a child rights centre in Ghana.

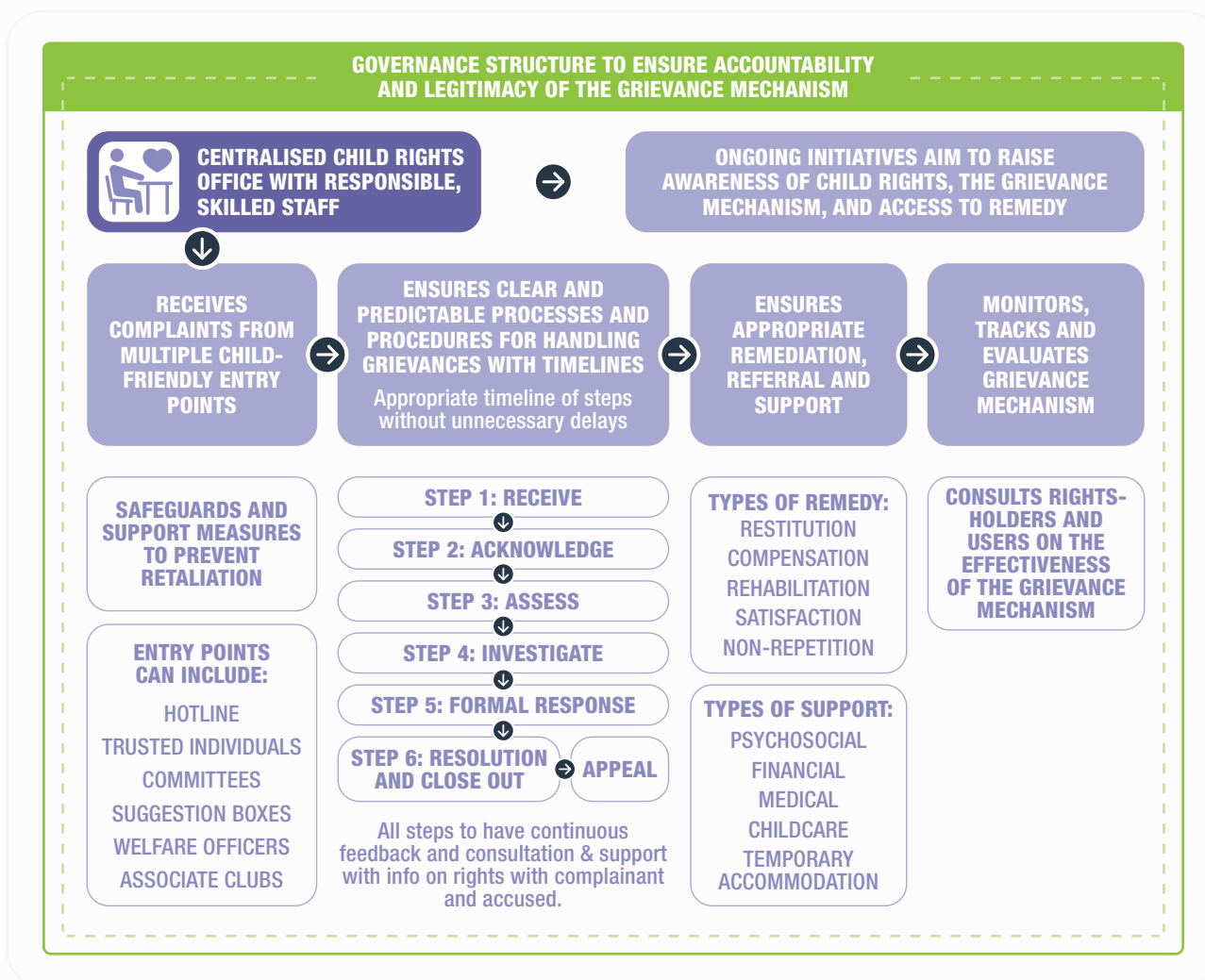


■ **Figure 4:** This diagram illustrates a proposed framework to strengthen children's access to grievance channels and remedy by linking community-based and state-based protection systems through a locally based independent child rights office. On the left, community rights-holders—including children—primarily report concerns through informal and non-state-based community structures such as CCPCs, traditional leaders, or parents. These trusted local mechanisms are preferred but often lack the capacity to handle child rights violations or to refer cases effectively to state-based agencies. The child rights office, at the centre of the framework, acts as a vital bridge between local and state systems. The arrows indicate two-way communication and referral flows: the office receives reports directly from communities or reports through its door or additional entry points (e.g. WhatsApp line and email), supports and trains local structures, and connects unresolved or serious cases to relevant state authorities. A Governance Structure body ensures accountability across the system. Together, these elements create a coherent, child-friendly ecosystem for reporting, remediation, and protection within communities. While we suggest state support to host the child rights office, this support is recommended to be administrative and logistical. The center should remain independent operationally and in terms of decision-making, whilst being overseen by a multi-stakeholder governance structure.

The first key component of the CFGM involves the establishment of a **of a National Governance Structure** that oversees the entire CFGM and the child rights office(s). The body comprises state representatives (particularly CHARJ and DSWSD), non-governmental organisations (especially those with a mandate in child protection, such as the ICI, UNICEF, and ILO), the private sector (especially those businesses/sectors with a strong commitment to child protection), independent consultants with expertise in child rights, and rights-holder representation. This enhances the legitimacy and equity of the CFGM by ensuring oversight, impartiality, and accountability. It reinforces trust and prevents conflicts of interest, victimisation and retaliation in grievance handling. This oversight body is mandated to perform eight core functions:

1. **Ensures legitimacy and accountability:** Provides independent oversight of the child-rights office's functioning to ensure impartiality, transparency, and alignment with child rights and child-friendly principles and international standards (e.g. UNCRC, UNGPs).
2. **Approve and review policies and procedures:** Regularly review and endorse grievance handling procedures, ensuring they are child-sensitive, accessible, and culturally appropriate.
3. **Monitor case handling and outcomes:** Oversee the monitoring of grievances —without interfering in individual cases — to ensure child friendliness, timely processing, fair outcomes, and appropriate remediation and referral actions.
4. **Assess system performance:** Evaluate the effectiveness of the child-rights office using the child-friendly indicators (See Annexure B)
5. **Promote stakeholder participation:** Ensure meaningful representation of key stakeholder groups, including child protection actors, community representatives, NGOs, the private sector and government bodies in the operation and evaluation of the child-rights office and the impact of international supply chains on child labour (e.g., poor purchasing practices increasing the risk of child labour)
6. **Safeguard confidentiality and protection:** Oversees that all cases, especially those involving children, are handled with strict confidentiality, do not expose complainants to retaliation or harm and address the socio-cultural factors that make children vulnerable when reporting harm
7. **Support learning and continuous improvement:** Review periodic reports and lessons learned to strengthen the child friendliness of the office, preventive actions, awareness-raising, and system improvements.
8. **Provide strategic guidance:** Advise on systemic issues emerging from grievances and ensure these inform policy, training, and broader child protection efforts.





■ *Figure 5: This diagram presents an effective child-friendly grievance that meets the 7 effectiveness criteria of the UNGPs, described in more detail on the following pages.*

The second key component of the CFGM involves the child-rights office, which implements the 7 effectiveness criteria of the UNGPs, whilst remaining a haven for children to safely report issues and receive access to remedy. The office works closely with both existing **proactive** and **reactive** reporting structures, building their capacity to identify, refer, and manage child-related grievances in a rights-based and sensitive manner. It also receives reports directly through multiple entry points, such as WhatsApp messages and/or emails, as well as direct reporting at the office.



This strengthens existing structures trusted by communities and children and provides alternative channels for reporting violations safely and anonymously.

The **Child Rights Office** is mandated to perform seven core functions, each of which is described below:

1 Build Awareness on Child Rights and the Child Rights Office

To strengthen community understanding and trust in the mechanism, the Child Rights Office actively implements child rights awareness and outreach programmes. These promote knowledge of children's rights, available reporting channels and access points, and the functions of the independent Child Rights Office. Awareness activities use age-appropriate and culturally sensitive communication methods, ensuring that children, parents, teachers, and community leaders all understand how and when to use the reporting channels and the services of the office. Awareness efforts should be culturally sensitive, emphasising the role that parents and the community have in keeping children safe, whilst encouraging the healthy development of children if they work on farms. Outreach programmes should also be sensitive to literacy barriers, all ages of children, language and gender. By increasing visibility and accessibility, the office builds confidence among children and their communities that reporting is safe and trustworthy.

CORE FUNCTION 1: KEY CRITERIA

- ☐ The Child Rights Office has implemented child rights awareness and outreach programmes to strengthen community understanding and trust in the mechanism.
- ☐ Awareness activities promote knowledge of children's rights, available reporting channels, and the role of the independent Child Rights Office.
- ☐ Communication methods specifically target children and are age-appropriate and culturally sensitive, engaging children, parents, teachers, and community leaders.
- ☐ Outreach emphasises community and parental responsibility for child safety and supports healthy child development in farm settings.
- ☐ Activities are inclusive of all literacy levels, ages, languages, and genders.
- ☐ Increased visibility and accessibility have built community and child confidence that reporting is safe and trustworthy.

2 Map the Remedy Ecosystem

The Child Rights Office will take overall responsibility for mapping and overseeing the access-to-remedy ecosystem of the district where it is located. This process involves identifying and analysing both proactive and reactive mechanisms, including state-based structures (such as social welfare and community development offices and police units) and non-state-based mechanisms (such as NGOs, community associations, faith-based organisations, local clubs and traditional authorities). Mapping these reporting structures will help to understand existing pathways through which children seek help, identify overlaps or gaps in the system, and strengthen linkages between community-level and institutional actors. This comprehensive mapping will lay the foundation for a coordinated, child-centred response across the ecosystem.

CORE FUNCTION 2: KEY CRITERIA

- ☐ The Child Rights Office has mapped and oversees the district's access to remedy ecosystem.
- ☐ Proactive and reactive mechanisms have been identified and analysed.
- ☐ Both state-based (e.g. social welfare offices, police units) and non-state-based (e.g. NGOs, community and faith-based groups, traditional authorities) structures are included.
- ☐ Existing help-seeking pathways, overlaps, and gaps have been assessed.
- ☐ Linkages between community and institutional actors have been strengthened.
- ☐ A coordinated, child-centred response framework has been established.
- ☐ The mapping builds on ICI's work and includes informal networks.



3 Support and Build the Capacity of Existing Reporting Structures

Recognising the vital role of community-level actors and leaders, the office should provide capacity-building and technical support to existing local structures, including community-based officers, child protection committees, teachers and community leaders. Training focuses on child-friendly indicators, effective case handling procedures, safeguarding practices, and the sensitive management of issues such as child labour, abuse, neglect, or exploitation (See Annexure B). This approach strengthens the ability of local actors to identify risks early, respond appropriately, and uphold children's rights within their own communities.

CORE FUNCTION 3: KEY CRITERIA

- ☐ Provides capacity-building and support to local child protection structures, including informal structures such as community leaders, teachers, Queen mothers and Unit Committees
- ☐ Trains community-embedded structures on child-friendly indicators, case handling, and safeguarding (See Annexure B).
- ☐ Equips actors to manage child labour, abuse, neglect, and exploitation.
- ☐ Strengthens early risk identification and appropriate response.

4 Ensure the accessibility of the office to receive child rights violations, and effective and child-friendly handling of child rights violations

The Child Rights Office has a core responsibility to ensure that it establishes reporting channels that are owned by the office and fully accessible, trusted, and safe for children. These could include WhatsApp lines, SMS hotline, email and accessing the office in person. To make the office more child-friendly, it has private safe spaces where children can share their experiences, preferably with children's books and stationery for drawing and playing. There are no formalities keeping children from reporting (e.g., paperwork that needs to be completed, or a security guard). Ensuring accessibility begins with the active involvement of children in the design and ongoing monitoring of the mechanism. Children's perspectives should shape how it the Child Rights Office operates and children prefer to seek help.

The office also recognises that children may prefer to continue using informal and non-state-based structures, and the office receives these cases and supports local community leaders in case handling. Each report made by a child, irrespective of how trivial and regardless of the nature, should be properly recorded and responded to. A victim-survivor approach is used to place the child's safety, dignity, and well-being at the centre of all actions. It ensures that cases are managed in a trauma-informed, confidential, and respectful manner, prioritising the child's immediate protection and informed participation throughout the process. Staff are trained to apply "do no harm" principles and maintain transparent communication, ensuring that the grievance process contributes to the child's healing, empowerment, and restoration of rights. Children's informed consent is key to gaining trust, and children should guide staff as to how they would like to be informed throughout the process.

Child-friendly tools are readily available to help children understand their rights. The process also provides support services, such as psychosocial or medical support, counselling, childcare, transportation, and information about paralegal services.

The Inter-Sectoral Standard Operating Procedures (SOPs) for Child Protection and Family Welfare developed for the Ministry of Gender Children and Social Protection (Department of Children), should be utilised for case management.³¹ All reports should be logged, acknowledged, and tracked from the start to resolution in a manner that fosters trust and accountability with children. All reports received are triaged so that the correct support services and (where applicable) state-based child protection services are engaged or reports are escalated. Formal referral protocols have been developed, or the Office is reliant on the SOP referred to above. This supports predictability and helps ensure consistent and fair treatment of all cases. Documented procedures should be developed to build predictability and transparency, setting clear expectations for all parties. Defined timelines and responsibilities reduce the risk of delays and build user confidence.

To maintain fairness and transparency, the office has designated specific trained officers accountable for receiving and handling child-related grievances, ensuring that these processes are managed sensitively with care and kindness and without bias. Measures are also in place to prevent interference from adults—including parents, supervisors, or community leaders — who might attempt to influence a child's decision to report or the outcome of a case.

1 2 3 4 5 → 6

Detailed below are the steps involved in handling child-related grievances:

Step 1: Receive

1

The Child Rights Office receives grievances through multiple access points suitable to children of different ages, genders, and backgrounds. Special provisions are made for vulnerable children—such as very young, illiterate, or disabled children, or those fearing retaliation. Each grievance is documented and handled confidentially (as far as feasible) and sensitively, ensuring children are protected from further harm.

Step 2: Acknowledge

2

Every grievance is promptly acknowledged in a child-friendly manner, ensuring that children understand that their concerns have been received, taken seriously, and will be handled confidentially. Information on what to expect next is clearly communicated through means that they prefer.

Step 3: Assess

3

The grievance is assessed to determine its nature, urgency, and the level of risk to the child. During this stage, responsible persons trained in handling child-related issues evaluate the appropriate response path while ensuring non-interference from adults or other parties.

Step 4: Investigate

4

Investigations are conducted with utmost sensitivity and in line with child protection standards. The process safeguards the child's privacy, dignity, and emotional well-being, and ensures that the investigation process is transparent and fair.

Step 5: Formal Response

5

The office provides feedback to the child (and, where appropriate, their guardian or trusted representative) in an accessible, age-appropriate format preferred by the child. Support services are made available to support the child as needed (e.g. health services etc.)

Step 6: Resolution and close-out

6

Remedies are designed to be child rights-compatible, responding to, and remediating, not only the individual case but also identifying structural interventions to prevent recurrence. The child is informed about the resolution and the steps taken to protect them.

Appeal (where required)

Children have the right to appeal decisions and are supported in the processes so that they are aware of their rights and options. Appeals will be handled transparently, and outcomes will be monitored to ensure fairness and accountability.

CORE FUNCTION 4: KEY CRITERIA

- ☐ Establish accessible, trusted, and safe reporting channels for children (e.g., WhatsApp, SMS, email, in-person).
- ☐ Provide child-friendly spaces for reporting, with minimal formalities and supportive materials (books, stationery).
- ☐ Involve children in the design, monitoring, and ongoing improvements of the mechanism.
- ☐ Accept and support cases reported through informal or non-state structures.
- ☐ Record, acknowledge, and track all reports from receipt to resolution.
- ☐ Triage reports to engage appropriate support services or escalate to state-based protection when needed.
- ☐ Develop documented procedures with clear timelines and responsibilities for transparency and predictability.
- ☐ Ensure children's informed consent guides communication and process involvement.
- ☐ Prioritise children's well-being and interests throughout case handling.
- ☐ Provide child-friendly tools to explain children's rights and available support services (psychosocial, medical, counselling, childcare, transport, paralegal information).
- ☐ Designate trained officers responsible for receiving and handling grievances sensitively and without bias.
- ☐ Implement measures to prevent adult interference in reporting or outcomes.
- ☐ Steps in handling grievances include receipt, acknowledgement, assessment, investigation, formal response, resolution and close-out and appeal (where necessary) and are child-friendly.

5 Safeguard and Support Children and Other Rights-holders

Central to the Child Rights Office's mandate is the responsibility to safeguard and support children and other rights-holders who report, or are victims of, child rights violations. The office should ensure that all cases are handled confidentially, respectfully, and in a manner that prioritises the safety and best interests of the child. This includes referral to appropriate services such as psychosocial support, legal aid, medical assistance, or alternative care. Where needed, the office will coordinate with state and non-state protection agencies to guarantee comprehensive and timely responses to each case.

CORE FUNCTION 5: KEY CRITERIA

- ☐ Safeguard and support children and other rights-holders reporting or affected by child rights violations.
- ☐ Handle all cases confidentially, respectfully, and prioritise the child's safety and best interests.
- ☐ Refer children to appropriate support services (psychosocial, legal aid, medical assistance, or alternative care).
- ☐ Coordinate with state and non-state protection agencies to ensure comprehensive and timely responses.



6 Facilitate and Provide Meaningful Remediation

Several pathways to remedy are clearly defined to restore children and other rights-holders' rights and dignity, including mediation, referral and support. Remediation is rights-compatible and may include restitution, compensation, rehabilitation, and guarantees of non-repetition. These pathways also include support to access state-based services such as the police service, judicial, social welfare, etc. The Child Rights Office serves as a hub for channelling initiatives and programmes that contribute to remediation—not only addressing immediate cases of harm but also tackling their underlying causes. Particular emphasis is placed on connecting children and communities to education initiatives, skills development programmes, and child labour funds. By integrating remedial actions that address the root causes and structural drivers of child-related risks, such as poverty and lack of schooling, the office helps ensure that remediation is meaningful and leads to the restoration of children's rights.

CORE FUNCTION 6: KEY CRITERIA

- ☐ Define clear pathways to remedy that restore children's and rights-holders' rights and dignity (e.g., mediation, referral, support).
- ☐ Ensure remediation is rights-compatible, including restitution, compensation, rehabilitation, and guarantees of non-repetition.
- ☐ Facilitate access to state-based services (police, judiciary, social welfare) as part of remediation.
- ☐ Act as a hub for initiatives addressing both immediate harm and the underlying causes of child rights violations.
- ☐ Establish a child labour fund to support families and their children.
- ☐ Connect children and communities to education and skills development.
- ☐ Integrate remedial actions that tackle structural drivers of child-related risks (e.g., poverty, lack of schooling) to ensure meaningful restoration of rights.

7 Monitoring and Evaluation on the Child-Friendliness of the Remedy Ecosystem

The Child Rights Office will work collaboratively with both state-based and non-state-based structures to monitor the functioning and child-friendliness of the remedy ecosystem over time. This will include collecting data on case handling, user satisfaction, accessibility, and protection outcomes, as well as conducting regular evaluations against child-friendly indicators aligned with the UNGPs - see [Annexure B](#). Findings will inform continuous improvement efforts, ensuring that the grievance mechanism remains effective, trusted, and responsive to children's evolving needs. Continuous feedback and consultation with affected individuals (especially children) throughout the process reinforce accessibility, trust, and participation—making the mechanism both effective in delivering remedy and instrumental in strengthening respect for human rights. Other rights-holders, especially more vulnerable rights-holders such as children, illiterate people, people with disabilities, and women, are consulted on the effectiveness of the grievance mechanism, especially concerning its accessibility and mandate to foster trust and accountability.

CORE FUNCTION 7: KEY CRITERIA

- ☐ Monitor the child-friendliness and effectiveness of the remedy ecosystem with state and non-state partners.
- ☐ Collect and evaluate data on cases, accessibility, satisfaction, and protection outcomes.
- ☐ Use child-friendly UNGP-aligned indicators to inform continuous improvement.
- ☐ Seek ongoing feedback from children and vulnerable rights-holders.
- ☐ Ensure the mechanism remains trusted, accessible, and responsive.

Phased implementation approach: Step-by-step plan for institutionalising the mechanism across Ghana

To ensure the feasibility criteria is practical, context-appropriate, and effectively embedded, it is recommended that the criteria be first piloted in one region with a single office. This initial phase will serve as a learning and refinement period, allowing the project team to assess the functionality of the criteria, identify potential challenges, and make necessary adjustments before broader rollout. While the Department of Social Welfare and Development (DSWD) should formally host the CFGM, its implementation should be guided by an independent implementation body comprising representatives from the ICI, UNICEF, and other child rights organisations, which could subsequently evolve into the governance structure for the mechanism.

Following the pilot, key learnings and feedback should be systematically documented and integrated into the CFGM to strengthen its applicability across different regional contexts. Only once the model has been tested and refined should scaling to additional regions—particularly those identified as high-risk for child rights issues—be undertaken. This phased approach will help ensure that implementation is effective. Importantly, a clear and well-defined plan for financing and resourcing the scale-up phase should be developed as part of the pilot evaluation. This will ensure that expansion is adequately supported, with appropriate human and financial resources in place to maintain quality and consistency across regions. Scaling across regions in Ghana should be prioritised based on assessed risks of child rights violations, informed by existing evidence, as well as the level of private sector engagement, particularly in high-risk, export-oriented sectors such as mining and cocoa production.

The following section provides a step-by-step implementation plan for a Child-Friendly Grievance Mechanism (CFGM). It proposes four phases for full implementation. It is important to note that it is expected that the implementation of CFGM needs to be steered by an implementation committee (or an implementation project team) that has experience and expertise in grievance mechanisms, child protection and can connect the various stakeholders (local and national) to ensure smooth implementation.



Staff managing child-related grievances should have:

- ☒ It is recommended that the office have both a male and a female staff member.
- ☒ Strong knowledge of child rights, safeguarding, and protection frameworks.
- ☒ Child-centred and gender-sensitive approach in all interactions.
- ☒ Effective communication skills with children of different ages and backgrounds.
- ☒ Case management and documentation skills, ensuring confidentiality and accuracy.
- ☒ Investigation and interviewing skills appropriate for sensitive child cases.
- ☒ Ability to identify and refer cases to appropriate protection and support services.
- ☒ Trauma-informed and psychosocial awareness.
- ☒ Cultural competence and capacity to engage with families and communities.
- ☒ Commitment to continuous learning and adherence to child-friendly principles.

Phase 1: Foundation (Months 1–6)

STEP 1: Establish Governance Structure

- Form an oversight multistakeholder body with representation from government, NGOs, the private sector, and rights-holders. It is recommended that MoGCSP represents this government role and that all stakeholders roles and responsibilities are clearly defined in the mandate.
- Develop a clear mandate and principles for the CFGM that are aligned with the Conventions of the Rights of the Child
- Develop a clear governance mission that defines the responsibilities of the Governance Structure, explicitly outlining its role in ensuring the grievance mechanism meets child-friendly standards and that all cases are handled in the best interests of the child, in line with the CFGM mandate.

STEP 2: Establish the host and funding

- Secure commitment from relevant state-based organisations and the Department of Social Welfare and Social Development (DSWSD), and to host the child rights office and potentially draw up an MOU with an NGO to initially run the office on behalf of the Ghanaian government. It is recommended that private sector and NGO funding is explored to initially support the set up of the host.
- Develop a business case for private sector engagement, emphasising a CFGM that tackles the



root causes of child labour and helps companies meet expectations under the UNGPs and emerging HRDD legislation, particularly in relation to access to remedy.

- Negotiate funding agreements with cocoa and mining sector partners (as well as others where feasible), particularly for establishing a child labour fund to provide financial assistance for cases involving child labour due to abject poverty, provide access to vocational training, and education.
- Ensure that an appropriate budget is allocated to cover the operational costs of the office, including staff salaries, awareness campaigns, capacity-building activities and a fund for remediation activities.
- Prioritise the appropriate district to launch the pilot Child Rights Office based on expectations around funding (cocoa companies may prefer cocoa-growing regions) and a high risk of child rights issues.

STEP 3: Recruit Core Team

- Hire an experienced human rights expert as the office head
- Recruit trained case officers with child protection expertise
- Establish reporting lines and accountability frameworks, including clear roles and responsibilities, defined reporting procedures, and consequences for breaching protocols (e.g., breaches of confidentiality or failure to adhere to child-friendly principles).



Considerations for the Child Rights Office:

- ☒ Create a safe, child-friendly space that is private, non-intimidating, with child-appropriate furniture, books, toys and stationery
- ☒ Ensure that there are private meeting rooms
- ☒ Ensure the office is an accessible location, such as close to schools, community centres
- ☒ Consider how information will be kept secure
- ☒ Consider adding noticeboards or posters that are child-friendly, informing children of their rights
- ☒ Basic IT and equipment

Phase 2: System Design (Months 4-9)

STEP 1: Map the Access to Remedy Ecosystem

- Identify and document all state and non-state reporting structures (including community leaders, teachers and clubs) in the pilot region
- Analyse gaps, overlaps, and referral pathways
- Build partnerships with service providers (psychosocial, legal, medical)

STEP 2: Develop Operational Infrastructure

- Draft child-friendly SOPs for grievance handling (receive, acknowledge, assess, investigate, respond, resolve, appeal). The SOPs developed by UNICEF should be consulted.
- Design multiple child-friendly access points specifically for the CFGM (in-person, WhatsApp, SMS, email)
- Create a confidential case logging and tracking system integrated with SWIMS

Phase 3: Pilot Launch (Months 10-18)

STEP 1: Capacity Building

- Train local CCPCs, traditional leaders, and community officers on child-friendly indicators
- Conduct staff training on safeguarding and child-sensitive case handling
- Establish referral protocols with police, social welfare, and judicial services (e.g., clear referral pathways for when incidents can be locally resolved, or when they should be referred)

STEP 2: Awareness Campaign

- Deploy culturally sensitive, age-appropriate outreach in pilot communities on child rights, and the CFGM and its services
- Engage parents, teachers, and community leaders on child rights, and the CFGM and its services
- Launch reporting channels with clear messaging on safety and confidentiality on the CFGM and its services

STEP 3: Operational Testing

- Process initial grievances through the full case cycle
- Monitor accessibility, response times, and child satisfaction
- Refine procedures based on early feedback

Phase 4: Evaluation & Scale (Months 19-24)

STEP 1: Monitor Performance

- Assess against child-friendly indicators (UNGP-aligned)
- Collect data on case outcomes, user satisfaction, and protection effectiveness
- Conduct an independent evaluation with child participation

STEP 2: Remediation & Prevention

- Connect cases to education, skills development, and child labour funds
- Address systemic issues identified through grievance patterns
- Report findings to the oversight body for policy recommendations

STEP 3: Scale Preparation

- Document lessons learned and best practices
- Secure funding for expansion to additional high-risk regions
- Replicate the model with adapted local considerations

Critical Success Factors: Independent oversight, sustained private sector and public funding, meaningful child participation, strong community trust, effective referral networks, and continuous capacity building.

Resourcing and financing the CFGM

During the research, it was very difficult for participants to engage in discussions on the resources needed to implement the CFGM. The costs shared in this report are provisional and based on desktop research and should be reviewed against actual costs. The first set of costs is related to the setting up of the Child Rights Office (CRO), whereas the second set of costs is for the annual operational costs for the CFGM and one CRO.

If the pilot proves to be effective, scaling costs should consider the one-time start-up costs. Scaling the CFGM would involve significant financial investment; yet the cost implications should not be understood as a simple multiplication of pilot costs. One-time start-up costs would diminish in relative importance over time, and meaningful economies of scale are likely in areas such as procurement, training, awareness-raising, and specialist services. A phased scaling approach, informed by pilot cost data and refined budgeting, would be essential to ensure financial sustainability and cost-effectiveness at scale.

One-time start-up costs (assuming the office building is rented):

	Estimated cost (USD)	Estimated cost (GHS)
Governance structure	Voluntary	Voluntary
Office furniture and equipment	\$5'000 – \$10'000	GH¢57,850 – GH¢115,700
Initial setup for entry points (phones, WhatsApp, email, basic IT)	\$1'000 – \$2'000	GH¢11'570 – GH¢23'140
Total one-time start-up costs (one Child Rights Office)	\$6'000 – \$12'000	¢69'420 – ¢138'840

Recurring Annual Operations Costs (one Child Rights Office):

	Estimated cost (USD)	Estimated cost (GHS)
Governance structure	Voluntary	Voluntary
Local Office rent and utilities	\$3'000 – \$8'000	GH¢578'500 – GH¢1'157'000
Operational costs (printing, office supplies and maintenance – including a child-friendly reception/private room)	\$3'000 – \$6'000	GH¢34'710 – GH¢69'420
Staff Salaries	\$90'000 – \$180'000	GH¢1'041'300 – GH¢2'082'600
Awareness Campaign	\$8'000 – \$15'000	GH¢92'560 – GH¢173'550
Entry point operational costs	\$1'000 – \$3'000	GH¢11,570 – GH¢34,710
Capacity Building and Training	\$8,000 – \$12,000	GH¢92,560 – GH¢138,840
Remediation Fund	\$50,000 – \$100,000	GH¢578,500 – GH¢1,157,000
Total Annual Operational Costs for Pilot Implementation of one Child Rights Office	\$213,000 – \$424,000	GH¢2,964,410 – GH¢4,926,680

This section presents some of the key risks to implementing the CFGM and strategies to mitigate these risks.

● **Potential Risk:**

Children face harm or fear harm from parents, employers, or community members after reporting, and/or whistleblowers are targeted.

● **Mitigation strategies:**

- ✦ Raise awareness with local communities on child rights and risks (preventing retaliation and better understanding)
- ✦ Implement strict confidentiality protocols and engage children on how they can be protected
- ✦ Offer anonymous reporting channels (SMS, WhatsApp line)
- ✦ Establish emergency response protocols for immediate threats
- ✦ Create safe spaces for children at risk of retaliation
- ✦ Train staff on threat assessment and protective measures
- ✦ Develop witness protection partnerships with police/social services

● **Potential Risk:**

Communities distrust the new mechanism; children fear reporting

● **Mitigation strategies:**

- ✦ Continue to consult children and community representatives on the mechanism
- ✦ Continue to review the child friendliness of the CFGM
- ✦ Leverage trusted local leaders as champions and intermediaries for the CFGM
- ✦ Demonstrate quick wins through visible case resolutions, including to children
- ✦ Maintain transparency through regular community feedback sessions in a child-friendly manner where feedback involves children
- ✦ Publish anonymised success stories showing tangible outcomes
- ✦ Strengthen existing community structures

● **Potential Risk:**

Private sector withdraws support; insufficient resources for scale; operational sustainability threatened

● **Mitigation strategies:**

- ✦ Secure multi-year funding commitments in formal agreements
- ✦ Diversify funding sources (multiple companies, development partners, government)
- ✦ Build a cost-sharing model with the Ministry of Gender, Children and Social Protection (MoGCSP) for long-term integration
- ✦ Demonstrate ROI through impact metrics attractive to funders
- ✦ Establish contingency fund (6-12 months operating costs)
- ✦ Phase expansion based on confirmed funding availability

● **Potential Risk:**

Ministerial host lacks capacity; referral agencies are unresponsive or under-resourced; cases fall through gaps; duplication of efforts

● **Mitigation strategies:**

- ✦ Formalise MOUs with all state agencies (police, courts, social welfare) and non-state organisations
- ✦ Establish dedicated liaison officers in partner agencies
- ✦ Conduct joint training to align procedures and build relationships
- ✦ Create clear escalation pathways with defined timelines
- ✦ Regular coordination meetings with multi-agency representation
- ✦ Document and report systemic bottlenecks to the governance structure

● **Potential Risk:**

Insufficient expertise in child protection; high turnover disrupts operations; inconsistent case handling

● **Mitigation strategies:**

- ✦ Offer competitive salaries and professional development opportunities
- ✦ Provide continuous training on trauma-informed, child-centred approaches
- ✦ Develop comprehensive onboarding program and procedure manuals
- ✦ Create a mentorship system pairing junior and senior staff
- ✦ Establish clear career progression pathways
- ✦ Conduct regular supervision and peer review sessions

● **Potential Risk:**

Communities view child rights violations as acceptable; parents resist interventions; gender norms limit girls' access

● **Mitigation strategies:**

- ✦ Frame messaging around child safety and healthy development, not prohibition
- ✦ Engage traditional and religious leaders in awareness design
- ✦ Use culturally appropriate communication (local languages, storytelling)
- ✦ Emphasise family economic support alongside child protection
- ✦ Train staff on cultural sensitivity and community engagement
- ✦ Adapt procedures to local contexts while maintaining rights standards

● **Potential Risk:**

Office overwhelmed by grievances; slow response times erode trust; quality of handling declines

● **Mitigation strategies:**

- ✦ Implement a triage system prioritising urgent/high-risk cases
- ✦ Build the capacity of community structures to handle lower-level issues locally (but still report formally cases for transparency and accountability)
- ✦ Monitor caseload metrics and adjust staffing accordingly

- ✦ Use case management software for efficiency tracking (e.g., SWIMS)
- ✦ Create referral protocols to distribute workload appropriately

● **Potential Risk:**

Confidential information leaked; children identified and exposed; legal liability

● **Mitigation strategies:**

- ✦ Use the secure, password-protected SWIMS case management system
- ✦ Limit data access on a need-to-know basis with audit trails
- ✦ Train all staff on data protection
- ✦ Use coded identifiers rather than names in documentation
- ✦ Conduct regular security audits and penetration testing
- ✦ Establish clear sanctions for confidentiality violations

● **Potential Risk:**

Private sector funders influence case outcomes; political interference; the office serves corporate interests over children

● **Mitigation strategies:**

- ✦ An independent governance structure monitors impartiality and decision-making
- ✦ Establish a clear separation between funders and case handling operations
- ✦ Prohibit funder representation in case review processes
- ✦ Conduct independent reviews or assessments of case outcomes for bias
- ✦ Empower the oversight body to investigate conflicts of interest
- ✦ Build a transparent governance mission with ethical guidelines on impartiality and keeping the best interests of the child at the heart of the office's operations

● **Potential Risk:**

Resolutions do not address root causes; poverty drives repeat violations; children return to harmful situations

● **Mitigation strategies:**

- ✦ Connect families to livelihood programs, microfinance, and social safety nets that are part of the CFGM mandate

- ✦ Partner with education providers for school enrolment support
- ✦ Sustain child labour funds and community development initiatives
- ✦ Advocate for systemic policy changes based on grievance patterns
- ✦ Monitor post-resolution outcomes to ensure sustainability
- ✦ Address structural drivers (poverty, school access) in remedy design

● **Potential Risk:**

No data on effectiveness; the governance structure is ineffective; the mechanism fails to improve over time

● **Mitigation strategies:**

- ✦ Establish clear KPIs aligned with child-friendly indicators
- ✦ Conduct quarterly performance reviews with the oversight body
- ✦ Commission independent evaluations with child participation
- ✦ Implement real-time dashboards tracking case progress
- ✦ Create feedback loops where users assess mechanism quality
- ✦ Publish annual transparency reports on outcomes and challenges

● **Potential Risk:**

Model fails to replicate in new regions; local conditions vary significantly; expansion outpaces capacity

● **Mitigation strategies:**

- ✦ Document detailed implementation learnings during pilot
- ✦ Conduct feasibility assessments before regional expansion
- ✦ Adapt model to local contexts while maintaining core principles
- ✦ Phase scale-up incrementally with built-in adjustment periods
- ✦ Ensure funding and partnerships are secured before expansion
- ✦ Build regional champions and train-the-trainer programs



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