

## MINIMAL ADVANCEMENT – EFFORTS MADE BUT REGRESSION IN LAW THAT DELAYED ADVANCEMENT

In 2021, Kazakhstan made minimal advancement in efforts to eliminate the worst forms of child labor. The government approved dedicated funding for agencies to address the trafficking of children, increased penalties for sex crimes against children, and included child labor identifiers on labor inspection checklists. In addition, it adopted a new national action plan to combat trafficking in persons for 2021–2023 and published a number of reports on current action plans to address human trafficking and child labor. However, despite new initiatives to address child labor, Kazakhstan is assessed as having made



only minimal advancement because it implemented a law that delays advancement to eliminate child labor. On December 30, 2021, the President of Kazakhstan signed a law significantly restricting the circumstances under which unannounced inspections can be performed. The new law, which will come into effect on January 1, 2023, codifies and expands the government's existing practice since January 2020. Under the newly revised Entrepreneurial Code, unannounced inspections will be prohibited in all cases except in the presence of compelling grounds and supporting evidence enclosed to such a complaint, or if an inspection is mandated by judicial or tax authorities. The lack of unannounced inspections may leave potential violations of child labor laws and other labor abuses undetected in workplaces. Children in Kazakhstan are subjected to the worst forms of child labor, including in commercial sexual exploitation, sometimes as a result of human trafficking. Children also engage in child labor in markets. The government lacks current, comprehensive, and detailed research on child labor, including in cotton production. In addition, labor inspections of small enterprises are permitted only in cases that pose a mass threat to life and health, law and social order, or national security.

### I. PREVALENCE AND SECTORAL DISTRIBUTION OF CHILD LABOR

Children in Kazakhstan are subjected to the worst forms of child labor, including in commercial sexual exploitation, sometimes as a result of human trafficking. Children also engage in child labor in markets. (I-3) Table I provides key indicators on children's work and education in Kazakhstan.

**Table I. Statistics on Children's Work and Education**

Children	Age	Percent
Working (% and population)	5 to 14	3.2 (79,690)
Attending School (%)	5 to 14	90.7
Combining Work and School (%)	7 to 14	3.6
Primary Completion Rate (%)		102.0

Source for primary completion rate: Data from 2020, published by UNESCO Institute for Statistics, 2022. (4)

Source for all other data: International Labor Organization's analysis of statistics from Multiple Indicator Cluster Survey 3 (MICS 3), 2006. (5)

Based on a review of available information, Table 2 provides an overview of children's work by sector and activity.

**Table 2. Overview of Children's Work by Sector and Activity**

Sector/Industry	Activity
Agriculture	Farming, including harvesting vegetables, weeding, and harvesting cotton and tobacco† (1,6-9) Herding cattle (6)
Industry	Construction† and road repair, activities unknown (1,6,10)
Services	Working in markets and on the streets, including transporting and selling items (1,2,6,8,11,12) Domestic work, including childcare (1,6,10,13) Working in gas stations (1,8)

# Kazakhstan

## MINIMAL ADVANCEMENT – EFFORTS MADE BUT REGRESSION IN LAW THAT DELAYED ADVANCEMENT

**Table 2. Overview of Children’s Work by Sector and Activity (Cont.)**

Sector/Industry	Activity
Services	Car washing (1,2,8,12)
	Working in restaurants† as waiters (1,2,8,12,14)
Categorical Worst Forms of Child Labor‡	Commercial sexual exploitation, sometimes as a result of human trafficking (1,3,8)
	Forced begging (3,10)
	Use in illicit activities, including selling drugs (1,3)

† Determined by national law or regulation as hazardous and, as such, relevant to Article 3(d) of ILO C. 182.

‡ Child labor understood as the worst forms of child labor *per se* under Article 3(a)–(c) of ILO C. 182.

There is no current and comprehensive research on child labor in Kazakhstan that can provide details about the number of children working in different sectors (including in construction, services, or the cultivation of cotton or other forms of agriculture), the nature of their work, or the hazards involved. (2)

Migrant children from the Kyrgyz Republic, some of whom may be unaccompanied, are reported to engage in work in Kazakhstan. (6) Working migrant children are often unable to work legally, limiting their entitlement to work protections. Although migrant children who are above the minimum working age theoretically have the right to a legal work permit, in practice, many are unable to obtain such a permit because they do not list "work" as their purpose for visiting the country when entering Kazakhstan. (6,15) Fear, corruption, and discrimination against migrants can also prevent migrant children from the Kyrgyz Republic from obtaining legal work permits. Kyrgyzstani migrant children over age 16 who are in irregular migration status are vulnerable to administrative fines, arrest, and detention with adults. (6)

The government has continued its efforts to repatriate and reintegrate Kazakhstani children from conflict zones in Syria and Iraq. Seven children, who had been living with male relatives or other adults who were participating in armed conflict in Syria, were repatriated and provided with rehabilitation services in February 2021. (3)

Migration authorities sometimes register migrant children under age 16 as unnamed family members, rather than under their own names, which prevents them from receiving Kazakhstani identification documents. (16,17) Some of these undocumented migrant children fall victim to forced child labor and commercial sexual exploitation in Kazakhstan. (3,6,7) Although Kazakhstan guarantees free education regardless of migration status, migrant children face barriers to accessing education. Some school officials refuse to enroll or award diplomas to students who lack Kazakhstani identification documents, and many parents of undocumented children lack awareness of their right to appeal such decisions to regional education officials. (1,6,16) Landlords often do not register migrant tenants, which prevents migrant children from enrolling in local schools. (17) In 2021, the COVID-19 pandemic further exacerbated barriers to migrant and other vulnerable children's education. Reports indicate that some migrants in Kazakhstan who were awaiting return to their home countries did not enroll their children in school. (1,2) In addition, limited access to internet and other infrastructure impeded the ability of migrant, refugee, and internally displaced children to access distance learning and education resources while in-person schooling was suspended. (1)







Children with disabilities in Kazakhstan face challenges accessing education due to inaccessible school buildings, a lack of specialists able to provide inclusive education services, and official disability evaluations that render children eligible for at-home education only or ineligible for education entirely. (17,18) Children with disabilities who live in specialized, closed-care institutions may be compelled to assist caregivers in feeding, changing diapers, bathing, and dressing younger children. (13) Disabled children who are unable to access mainstream or inclusive education are at greater risk of being sent to such state institutions. (18)

## II. LEGAL FRAMEWORK FOR CHILD LABOR

Kazakhstan has ratified all key international conventions concerning child labor (Table 3).

## MINIMAL ADVANCEMENT – EFFORTS MADE BUT REGRESSION IN LAW THAT DELAYED ADVANCEMENT

**Table 3. Ratification of International Conventions on Child Labor**

Convention	Ratification
 ILO C. 138, Minimum Age	✓
 ILO C. 182, Worst Forms of Child Labor	✓
 UN CRC	✓
 UN CRC Optional Protocol on Armed Conflict	✓
 UN CRC Optional Protocol on the Sale of Children, Child Prostitution and Child Pornography	✓
 Palermo Protocol on Trafficking in Persons	✓

The government has established laws and regulations related to child labor (Table 4). However, gaps exist in Kazakhstan's legal framework to adequately protect children from the worst forms of child labor, including the minimum age for work.

**Table 4. Laws and Regulations on Child Labor**

Standard	Meets International Standards	Age	Legislation
Minimum Age for Work	No	18	Articles 31 and 69 of the Labor Code (15)
Minimum Age for Hazardous Work	No	18	Article 26.1(2) of the Labor Code; Article 153 of the Criminal Code (15,19)
Identification of Hazardous Occupations or Activities Prohibited for Children	Yes		Article 26.1(2) of the Labor Code; Decree of the Minister of Health and Social Development No. 944 of 2015 (15,20)
Prohibition of Forced Labor	Yes		Article 7 of the Labor Code; Articles 3, 128, and 135 of the Criminal Code (15,19)
Prohibition of Child Trafficking	Yes		Article 135 of the Criminal Code (19)
Prohibition of Commercial Sexual Exploitation of Children	No		Articles 134, 135, and 312 of the Criminal Code (19)
Prohibition of Using Children in Illicit Activities	Yes		Articles 132, 133, and 135.2(9) of the Criminal Code; Article 26.1(2) of the Labor Code (15,19)
Minimum Age for Voluntary State Military Recruitment	Yes	19	Article 38.1(2) of the Military Service Act (21)
Prohibition of Compulsory Recruitment of Children by (State) Military	Yes		Article 31 of the Military Service Act (21)
Prohibition of Military Recruitment by Non-state Armed Groups	Yes		Article 41 of the Law on Children's Rights; Articles 132 and 267 of the Criminal Code (19,22)
Compulsory Education Age	Yes	17‡	Article 30 of the Constitution; Articles 12 and 30 of the Law on Education (23,24)
Free Public Education	Yes		Article 30 of the Constitution (23)

‡ Age calculated based on available information (25,26)

In 2021, Law No. 393-VI entered into force, which amended the criminal code to increase penalties for sexual offenses against minors, including the involvement of children into commercial sexual exploitation by means of coercion and the production or distribution of child pornography. These offenses now carry increased prison terms, and those convicted are barred from the possibility of early release and precluded from working in jobs which involve contact with children. (19,27) On December 30, 2021, the President of Kazakhstan signed a law significantly restricting the circumstances under which unannounced inspections can be performed, which will come into effect on January 1, 2023. The revised Entrepreneurial Code will prohibit unannounced inspections in all cases except in the presence of compelling grounds and supporting evidence enclosed to such a complaint, or if an inspection is mandated by judicial or tax authorities. (28,29) These restrictions will severely impact the ability of the labor inspectorate to identify and prosecute child labor offenses.

# Kazakhstan

## MINIMAL ADVANCEMENT – EFFORTS MADE BUT REGRESSION IN LAW THAT DELAYED ADVANCEMENT

The Labor Code's protections, including the minimum age for employment and prohibitions on hazardous work, do not meet international standards because they do not cover children without a written work contract. In addition, although Article 69 of the Labor Code establishes caps on the maximum number of hours children ages 14 to 16 or 16 to 18 may work in a week, the law does not determine the activities or conditions in which children may engage in light work. (15)

Article 134 of the Criminal Code of the Republic of Kazakhstan criminalizes involving a minor in prostitution, and Article 135 of the Criminal Code criminalizes trafficking of minors, including for the purpose of sexual exploitation. No law clearly criminalizes the users (clients) of prostitution involving children. (19) However, government officials report that any users identified in the course of a prostitution investigation involving minors will be charged under Article 122, which criminalizes adult sexual relations with persons under the age of 16. (30)

### III. ENFORCEMENT OF LAWS ON CHILD LABOR

The government has established institutional mechanisms for the enforcement of laws and regulations on child labor (Table 5). However, gaps exist within the operations of enforcement agencies that may hinder adequate enforcement of their child labor laws.

**Table 5. Agencies Responsible for Child Labor Law Enforcement**

Organization/Agency	Role
Ministry of Labor and Social Protection (MLSP)	Enforces child labor laws and conducts labor inspections through the Ministry's Committee on Labor, Social Protection and Migration. Implements the special social service program that funds shelters for survivors of human trafficking, including child survivors. (1,2)
Ministry of Education and Science (MOES)	Coordinates child protection activities, including response to child labor complaints. (1,2) An official from the regional-level Department of Education responds to reports of child labor and determines whether law enforcement should investigate the case. (31) If the case is in agriculture, local officials meet with parents and school officials to reinforce that children should be in school during the academic year. The Ministry's Center for the Adaptation of Minors provides assistance to survivors of the worst forms of child labor and makes referrals to appropriate government services or NGOs for further assistance. (31)
Ministry of Internal Affairs (MOIA)	Through the Anti-Trafficking Unit, identifies and carries out initial investigation of criminal cases of the worst forms of child labor and hazardous child labor. Engages in identification and protection of human trafficking victims, including child victims. (1,2)
Prosecutor General's Office	Provides oversight of police operations related to child labor crimes to ensure compliance with all relevant protocols and legal requirements. (1,2)
Child Protection Hotlines	Receive reports of illegal child labor. There are three hotlines: one run by the MOES Child Protection Committee, one run by the Ombudsman for Children's Rights, and one run by a local NGO. (8,27)

The Government of Kazakhstan maintains mobile squads in all regions of the country to monitor and respond to child labor violations. These squads consist of internal affairs officers, officials from local administrations, state labor inspectors, health professionals, youth workers, and psychologists. (32)

### Labor Law Enforcement

In 2021, labor law enforcement agencies in Kazakhstan took actions to address child labor (Table 6). However, gaps exist within the operations of the Ministry of Labor and Social Protection (MLSP) that may hinder adequate labor law enforcement, including lack of an appropriate number of inspectors.

**Table 6. Labor Law Enforcement Efforts Related to Child Labor**

Overview of Labor Law Enforcement	2020	2021
Labor Inspectorate Funding	\$3.1 million (1.3 billion KZT) (2)	Unknown
Number of Labor Inspectors	274 (2)	256 (1)
Mechanism to Assess Civil Penalties	Yes (15,33)	Yes (15,33)
Initial Training for New Labor Inspectors	Yes (2)	No (1)
Training on New Laws Related to Child Labor	N/A	No (1)
Refresher Courses Provided	Yes (2)	Yes (1)

## MINIMAL ADVANCEMENT – EFFORTS MADE BUT REGRESSION IN LAW THAT DELAYED ADVANCEMENT

**Table 6. Labor Law Enforcement Efforts Related to Child Labor (Cont.)**

Overview of Labor Law Enforcement	2020	2021
Number of Labor Inspections Conducted	3,982 (2)	4,300 (1)
Number Conducted at Worksite	228 (2)	4,300 (1)
Number of Child Labor Violations Found	5 (2)	9 (1)
Number of Child Labor Violations for Which Penalties Were Imposed	5 (2)	9 (1)
Number of Child Labor Penalties Imposed that Were Collected	5 (2)	9 (1)
Routine Inspections Conducted	Yes (2)	Yes (1)
Routine Inspections Targeted	Yes (2)	No (1)
Unannounced Inspections Permitted	Yes (32,34)	Yes (34)
Unannounced Inspections Conducted	Yes (2)	Yes (1)
Complaint Mechanism Exists	Yes (2)	Yes (1)
Reciprocal Referral Mechanism Exists Between Labor Authorities and Social Services	Yes (2)	Yes (1)

In 2021, the MLSP conducted periodic recertification of labor inspectors, requiring competence in all facets of labor inspection, including child labor. Labor inspectors also participated in training organized by international donors. (1) Article 143, which regulates labor inspection checklists, was amended in December 2021 to include identifiers for forced and child labor. (27) However, the number of labor inspectors is likely insufficient for the size of Kazakhstan's workforce, which includes more than 9.18 million workers. (35) According to the ILO's technical advice of a ratio approaching 1 inspector for every 20,000 workers in transitional economies, Kazakhstan would need to employ about 459 labor inspectors. (36,37)

A moratorium on labor inspections in small enterprises remained in effect during the reporting period. (1) Under this moratorium, an inspection can only occur at a small enterprise in cases that pose a mass threat to life and health, law and social order, or national security. (38,39) Small enterprises include businesses with fewer than 100 employees and average revenue below a government-determined threshold. (34) Under the newly revised Entrepreneurial Code, beginning in 2023, all small businesses will be exempt from inspections in their first 3 years after registration. (29,34)

Moreover, additional restrictions will come into force in 2023 that prohibit unannounced inspections unless suspected violations are supported by compelling evidence or the inspection is mandated by judicial or tax authorities. (29) This law officially codifies what has been standard practice since 2020, and is in part a response to complaints from business owners that labor inspectors use unannounced inspections as a pretext to solicit bribes. (30) Under current law, labor inspectors generally must notify entities at least 1 full day prior to a site visit or inspection unless the Entrepreneurial Code provides for an exception to this notice requirement. (1,34) Labor inspectors from the MLSP are empowered to conduct unplanned inspections on the basis of complaints, which are only considered valid if they are not anonymous. These notice requirements limit inspectors' ability to check that working conditions comply with national labor laws, including those related to child labor. (2,34) Labor inspectors are also currently authorized to conduct unannounced inspections of businesses on the basis of requests from law enforcement agencies, in response to complaints related to certain extreme health and safety hazards, and in cases in which the worksite is in a remote location. (1,2,34) In addition, labor inspectors can conduct routine inspections on the basis of risk assessment reports. (1,34)

The government also works with NGOs to conduct raids to detect child labor violations during annual, interministerial campaigns to raise awareness about, detect, and address incidences of child labor. These campaigns are widely publicized, limited in duration, and occur at approximately the same time each year. (1,2) As a result, the raids conducted during these campaigns may fail to adequately detect child labor in seasonal agriculture or at businesses that conceal violations in anticipation of these high-profile campaigns. There is also no indication of any inspections or raids specifically targeted at agriculture, which remains a high-risk sector for child labor. (6) From June 1 to 12, 2021, the Ministry of Education and Science (MOES) cooperated with other government agencies and NGOs to conduct more than 6,500 raids at more than 9,500 sites to detect child

# Kazakhstan

## MINIMAL ADVANCEMENT – EFFORTS MADE BUT REGRESSION IN LAW THAT DELAYED ADVANCEMENT

labor as part of the government's annual "Twelve Days Against Child Labor" campaign. (1,27) Raids were targeted at locations with a high risk for child labor, including markets, gas stations, and construction sites. As a result of these checks, 14 children were found to be engaged in child labor in construction and in restaurants, and their employers were fined for violations of labor legislation. (1)

### **Criminal Law Enforcement**

In 2021, criminal law enforcement agencies in Kazakhstan took actions to address child labor (Table 7). However, gaps exist within the operations of criminal law enforcement agencies that may hinder adequate criminal law enforcement, including insufficient allocation of human resources.

**Table 7. Criminal Law Enforcement Efforts Related to Child Labor**

Overview of Criminal Law Enforcement	2020	2021
Initial Training for New Criminal Investigators	Yes (2)	Yes (1)
Training on New Laws Related to the Worst Forms of Child Labor	N/A	Yes (1)
Refresher Courses Provided	Yes (2)	Yes (1)
Number of Investigations	19 (2)	2 (1)
Number of Violations Found	19 (2)	2 (1)
Number of Prosecutions Initiated	4 (2)	1 (1)
Number of Convictions	3 (2)	0 (1)
Imposed Penalties for Violations Related to the Worst Forms of Child Labor	Yes (2)	No (1)
Reciprocal Referral Mechanism Exists Between Criminal Authorities and Social Services	Yes (2)	Yes (1)

In 2021, the Anti-Trafficking in Persons Training Center at the Ministry of Internal Affairs (MOIA) Legal Academy in Karaganda trained 168 police officers on identification of victims of human trafficking. Of those, 68 were from juvenile police units specifically trained on countering the trafficking of minors into the worst forms of child labor, including commercial sexual exploitation and use in illicit activities. (1) The MOIA employs 42 operational officers who work specifically on trafficking in persons, including cases involving minors. However, reports indicated that the number of officers may be insufficient to adequately enforce criminal prohibitions against the worst forms of child labor in Kazakhstan. (2)

During the reporting period, police identified and initiated prosecution of two cases of minors being coerced into commercial sexual exploitation, for which one individual was sentenced to 3.6 years in prison. Additionally, three individuals were sentenced to no fewer than 5 years in prison for trafficking minors into commercial sexual exploitation in prosecutions that were initiated in previous years. (27) During 4 anti-trafficking operations throughout the year, police uncovered an additional 10 cases of coercing minors into commercial sexual exploitation. (27) While there were no reports of minors being used for the production or trafficking of drugs, 13 minors between the ages of 16 and 17 were detained in 2021 for the sale and possession of drugs. (1)

All children identified in the worst forms of child labor in 2021 were removed from the exploitative situations and referred to NGOs and government-run shelters for social services and other assistance. The government also approved designated funding for government agencies to eliminate child trafficking. (1)

## **IV. COORDINATION OF GOVERNMENT EFFORTS ON CHILD LABOR**

The government has established mechanisms to coordinate its efforts to address child labor (Table 8).



## MINIMAL ADVANCEMENT – EFFORTS MADE BUT REGRESSION IN LAW THAT DELAYED ADVANCEMENT

**Table 8. Key Mechanisms to Coordinate Government Efforts on Child Labor**

Coordinating Body	Role & Description
National Coordination Council on Combating the Worst Forms of Child Labor	Implements the National Action Plan (NAP) for the Elimination of the Worst Forms of Child Labor 2020–2022. (40) In May 2021, the Council met to discuss implementation of NAP and developed recommendations for improving prevention efforts. In February, the Council also published a report on the results of implementation activities under NAP in 2020. (1)
Interagency Trafficking in Persons Working Group	Coordinates efforts to eliminate human trafficking and recommends improvements to anti-human trafficking legislation, prevention strategies, protection of survivors, and prosecution of offenders. (41) Chaired by MOIA and MLSP on a 2-year rotational basis, its members include state bodies, international organizations, and NGOs. (41) In 2021, the working group met three times, during which it adopted a new NAP on trafficking in persons for 2021–2023 and discussed media monitoring to identify trafficking, including child pornography. (1,27)
Committee for the Protection of Children's Rights	Works to protect children from exploitation. Operates under MOES at province-level departments of education. (8) In 2021, the Committee for the Protection of Children's Rights published a report on the status of children's rights in Kazakhstan during the previous year. (1,42)
The Institute of the Ombudsperson for Children's Rights	Monitors observance of the rights of children. Receives and responds to complaints about violations of children's rights and drafts annual reports on children's rights. (1,43) In 2021, the agency received and responded to 334 complaints about violations of children's rights. (1)

**V. GOVERNMENT POLICIES ON CHILD LABOR**

The government has established policies that are consistent with relevant international standards on child labor (Table 9).

**Table 9. Key Policies Related to Child Labor**

Policy	Description
National Action Plan for the Elimination of the Worst Forms of Child Labor (2020–2022)	Addresses three priority areas, including (a) the creation of policies and laws to eliminate the worst forms of child labor; (b) the creation of programs to monitor vulnerable communities and sectors with the highest risk of child labor; and provide services to children who have been exploited in child labor; and (c) raising awareness about the worst forms of child labor. (40) During the reporting period, the government published a report on activities undertaken in 2020 to implement the National Action Plan. (1)
National Action Plan to Counter Trafficking in Persons (2021–2023)†	The Interagency Trafficking in Persons Working Group of MLSP adopted a new National Action Plan for 2021–2023 in February 2021. The new National Action Plan includes legislation improvements to provide shelter assistance to non-citizen survivors, align the legal definition of human trafficking with international standards, and improve identification procedures for front-line officials. (1) Some of the planned activities specifically target the worst forms of child labor, including efforts to prevent forced child labor, including the exploitation of child labor on cotton and tobacco fields and at construction sites; monitor and exchange data between competent agencies on advertisements of human trafficking and child pornography; and conduct human trafficking prevention and awareness campaigns for children. (1)

† Program was adopted during the reporting period.

‡ The government has other policies that may have addressed child labor issues or had an impact on child labor. (2,44)

**VI. SOCIAL PROGRAMS TO ADDRESS CHILD LABOR**

In 2021, the government funded and participated in programs that include the goal of eliminating or preventing child labor (Table 10). However, gaps exist in these social programs, including the inadequacy to address the problem in all sectors.

**Table 10. Key Social Programs to Address Child Labor**

Program	Description
Juvenile Care Centers†	MOES-run centers for minors located throughout Kazakhstan. Provide temporary shelter and assistance to vulnerable children, including child survivors of the worst forms of child labor, and street children. (2,41) Research was unable to determine whether the centers were active during the reporting period.
Shelters for Trafficking Victims†	Funded by the government and operated by NGOs, provide legal, psychological, medical, and educational services to survivors of human trafficking, including minors, in seven provinces and two cities, including Almaty. (41,45) In 2021, the government provided funding for nine shelters for survivors of human trafficking and forced labor, and passed legislation to make shelter services available to non-citizens. (1)

# Kazakhstan

## MINIMAL ADVANCEMENT – EFFORTS MADE BUT REGRESSION IN LAW THAT DELAYED ADVANCEMENT

**Table 10. Key Social Programs to Address Child Labor (Cont.)**

Program	Description
Awareness-Raising Campaigns†	Raise public awareness on child labor issues, including the annual "Twelve Days Against Child Labor" campaign, which in 2021 included thousands of social media posts and online events to raise awareness about child labor and child assistance hotlines. (1,2)
Camps for School-aged Children‡	Funded by the Government of Kazakhstan, camps provide services for children during school breaks across 13,000 recreational organizations. In 2021, the program received a budget of \$8.8 million and reportedly benefited 2 million children, including 500,000 vulnerable children. (1)

† Program is funded by the Government of Kazakhstan.

‡ The government had other social programs that may have included the goal of eliminating or preventing child labor. (46)

The government continued to take steps to identify and provide assistance to vulnerable children as a part of its 2020–2023 Roadmap to Strengthen the Protection of the Rights of Children, Counter Domestic Violence and Address Suicide among Adolescents. The MOES Committee for Children's Rights initiated changes to laws and regulations related to inclusive education, social protection of vulnerable of children, and strengthening the institution of the family. (1) More than 7,000 teachers and psychologists assisted around 2 million children and their parents and helped to resolve 150,000 crisis situations. (1)

The government also hosted a nationwide series of events dedicated to the World Children's Day and the 30th anniversary of the Independence of Kazakhstan in October and November 2021. The events focused on reaching vulnerable children, including orphans, children left without parental care due to labor migration, and children with special educational needs. (1)

Although the Government of Kazakhstan implemented programs in 2021 to protect vulnerable children and raise awareness about child labor, research found no evidence that it has carried out programs to assist children engaged in child labor in agriculture or service sectors.

## VII. SUGGESTED GOVERNMENT ACTIONS TO ELIMINATE CHILD LABOR

Based on the reporting above, suggested actions are identified that would advance the elimination of child labor in Kazakhstan (Table 11).

**Table 11. Suggested Government Actions to Eliminate Child Labor**

Area	Suggested Action	Year(s) Suggested
Legal Framework	Ensure that minimum age provisions and hazardous work prohibitions apply to all children, including those working without an employment contract.	2016 – 2021
	Criminally prohibit and penalize the use of a child for prostitution.	2019 – 2021
	Ensure that the law's light work provisions specify the activities and conditions in which children may engage in light work.	2020 – 2021
Enforcement	Strengthen the labor inspection system by eliminating barriers for onsite and unannounced inspections.	2020-2021
	Publish information on the labor inspectorate's funding and provide trainings for new labor inspectors as well as trainings on new labor laws.	2021
	Increase the number of labor inspectors to meet the ILO's technical advice.	2014 – 2021
	Lift the moratorium on labor inspections at small enterprises and ensure that the labor inspectorate conducts routine, targeted, and unannounced labor inspections at such businesses as appropriate.	2020 – 2021
	Strengthen detection of child labor by ensuring that targeted enforcement efforts, such as raids and labor inspections, are undertaken throughout the year and in all sectors in which children are vulnerable to child labor, including in agriculture.	2020 – 2021
	Increase the number of human trafficking-focused law enforcement officers to ensure adequate enforcement of criminal prohibitions against the worst forms of child labor.	2019 – 2021
Social Programs	Conduct research to gather comprehensive data on child labor, including the activities carried out by children working in agriculture, in construction, and in services, to inform policies and programs.	2013 – 2021
	Remove barriers that prevent migrant children who are above the minimum age for work to obtain work permits.	2021



## MINIMAL ADVANCEMENT – EFFORTS MADE BUT REGRESSION IN LAW THAT DELAYED ADVANCEMENT

Table 11. Suggested Government Actions to Eliminate Child Labor (Cont.)

Area	Suggested Action	Year(s) Suggested
Social Programs	Ensure that all children have access to education, including children with irregular migration status and children with disabilities, and raise awareness in vulnerable communities about existing remedies for denial of school enrollment.	2018 – 2021
	Ensure that Juvenile Care Centers continue to operate, and publicize information on activities undertaken during the reporting period.	2021
	Institute programs to address child labor, particularly in the agriculture and service sectors.	2014 – 2021

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