

Bhutan

MINIMAL ADVANCEMENT

In 2024, Bhutan made minimal advancement in efforts to eliminate the worst forms of child labor. Bhutan's Department of Labor adopted a Supplementary Adaptive Labor Inspection Protocol to identify ways to perform labor inspections despite budgetary and personnel limitations, including by integrating online systems for filing complaints into the Bhutan Labor Market Information System, encouraging whistleblowing, and establishing a reporting system for urgent labor-related violations. Additionally, Bhutan implemented its Thirteenth National Five Year Plan, which includes goals for strengthening the education system, which supports the reduction of child labor. However, Bhutan's laws do not meet international standards on the minimum age for work as the Labor and Employment Act allows children aged 13 to enter the labor force; forced labor prohibitions do not criminalize slavery; and the prohibition of child trafficking in the Penal Code (Amendment) Act of Bhutan 2021 still includes the necessity of force, fraud, or coercion in child trafficking cases. In addition, the government has not adopted a national policy to address child labor.

PREVALENCE AND SECTORAL DISTRIBUTION OF CHILD LABOR

Statistics on Children’s Work and Education		
Children	Age	Percent and Population
Working	5 to 14	3.8% (6,338)
Hazardous Work by Children	15 to 17	Unavailable
Attending School	5 to 14	84.7%
Combining Work and School	7 to 14	3.3%

Some children in Bhutan are subjected to the worst forms of child labor, including in commercial sexual exploitation, sometimes as a result of human trafficking, and in forced domestic work, including forced caregiving. Some children also perform dangerous tasks in construction.

Overview of Children’s Work by Sector and Activity	
Agriculture	Farming.
Industry	Construction.†
Services	Domestic work. Working in automobile shops. Working in hospitality services, including restaurants.
Categorical Worst Forms of Child Labor‡	Commercial sexual exploitation, sometimes as a result of human trafficking. Forced domestic work, including forced caregiving.

† 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.

SUGGESTED GOVERNMENT ACTIONS TO ELIMINATE CHILD LABOR

The suggested government actions below would close gaps USDOL has identified in Bhutan's implementation of its international commitments to eliminate the worst forms of child labor.

Area	Suggested Action
Legal Framework	Increase the minimum age for work from age 13 to age 15 to meet international standards.
	Ensure that laws prohibiting forced labor criminalize slavery.
	Make primary education compulsory and establish a compulsory age for education that is the same as the minimum age for work.
	Criminally prohibit child trafficking without requiring proof of the use of force, fraud, or coercion.
	Make publicly available the legal statute that prohibits the recruitment of children under age 18 into Bhutan's military.

Area	Suggested Action
Enforcement	Provide labor inspectors with adequate training and refresher courses on child labor laws and associated standard operating procedures, and adequately fund the inspectorate to ensure labor inspection coverage of all sectors and geographies.
	Ensure that routine and targeted inspections take place based on analysis of data related to risk-prone sectors and patterns of serious incidents.
	Provide criminal law enforcement agencies with sufficient personnel and training opportunities to ensure that they are able to adequately handle child trafficking crimes.
	Publish criminal law enforcement information related to the worst forms of child labor, including the number of investigations, prosecutions, convictions, and penalties imposed and collected.
	Publish labor law enforcement information, including the number of child labor violations for which penalties were imposed and collected.
	Increase the number of labor inspectors from 17 to 25 to ensure adequate coverage of the labor force of approximately 378,000 people.
Coordination	Publish information on the activities undertaken by the National Child Labor Task Force to address and prevent child labor.
Government Policies	Adopt a comprehensive policy or national action plan that addresses the worst forms of child labor and includes child labor prevention strategies.
Social Programs	Collect and publish data on the extent and nature of child labor to inform policies and programs.
	Implement programs to make education more accessible for stateless children, children living in remote locations, and children with disabilities, by improving transportation to schools and ensuring that children have access to identity documents for school enrollment.
	Ensure that the PEMA Secretariat (the National Nodal Agency for Mental Health Promotion and Services in Bhutan), the National Commission for Women and Children, and non-governmental service providers receive enough funding to effectively implement programs, including providing shelter homes and officers to oversee child protection, probation, and welfare services.
	Establish social programs aimed at eliminating or preventing child labor in all sectors in which it is known to occur, including in agriculture, domestic work, and commercial sexual exploitation. Ensure that these programs are adequately staffed, and target them toward children particularly vulnerable to child labor, including girls.

CHILDREN AT HIGHER RISK

Bhutanese girls are vulnerable to commercial sexual exploitation and sex and labor trafficking, including for forced domestic work and caregiving. Some girls in Bhutan are trafficked through debt bondage and face threats of physical abuse from traffickers. Girls who drop out of school in rural Bhutan are vulnerable to being trafficked to urban centers in Bhutan to work involuntarily as domestic helpers.

BARRIERS TO EDUCATION ACCESS

Children living in remote villages and those with disabilities may face difficulties in accessing public schools due to a lack of transportation. Additionally, although they have access to primary and secondary education, a small number of children who are stateless also lack access to the documentation necessary to enroll in higher education, making them more vulnerable to child labor and human trafficking.

LEGAL FRAMEWORK FOR CHILD LABOR

As Bhutan is not a member of the ILO, it has not ratified ILO Convention 138 Minimum Age for Work and ILO Convention 182 Worst Forms of Child Labor. However, it has ratified all other key international conventions concerning child labor. However, Bhutan's laws do not meet international standards on the minimum age for work because the Labor and Employment Act allows children aged 13 to enter the labor force.

Laws and Regulations on Child Labor			
Standard	Age	Meets International Standards	Legislation
Minimum Age for Work	13	X	Sections 170 and 171 of the Labor and Employment Act; Regulation on Working Conditions 2012: Acceptable Forms of Child Labor
Minimum Age for Hazardous Work	18	✓	Sections 170 and 171 of the Labor and Employment Act
Identification of Hazardous Occupations or Activities Prohibited for Children		✓	Section 9(e) of the Labor and Employment Act; Section 9 of the Regulation on Working Conditions 2012: Acceptable Forms of Child Labor
Prohibition of Slavery, Debt Bondage, and Forced Labor		X	Amendment 9 of Penal Code (Amendment) Act of Bhutan 2021; Sections 6–8, 9(a), and 10 of the Labor and Employment Act; Sections 154 and 155 of the Penal Code; Preamble and Sections 221 and 224 of the Child Care and Protection Act
Prohibition of Child Trafficking		X	Sections 9(a) and 10 of the Labor and Employment Act; Sections 221 and 224 of the Child Care and Protection Act; Amendment 9 of Penal Code (Amendment) Act of Bhutan 2021; Sections 154, 155, 379, and 380 of the Penal Code
Prohibition of Commercial Sexual Exploitation of Children		✓	Sections 9(b) and 10 of the Labor and Employment Act; Sections 222–224 of the Child Care and Protection Act; Sections 225 and 375–380 of the Penal Code
Prohibition of Using Children in Illicit Activities		✓	Sections 9(c) and 10 of the Labor and Employment Act; Section 220 of the Child Care and Protection Act
Minimum Age for Voluntary State Military Recruitment	18	✓	Defense Service Rules and Regulations
Prohibition of Compulsory Recruitment of Children by (State) Military		N/A*	
Prohibition of Military Recruitment by Non-state Armed Groups		✓	Sections 9(a) and 10 of the Labor and Employment Act
Compulsory Education Age		X	
Free Public Education		✓	Article 9.16 of the Constitution of the Kingdom of Bhutan

* Country has no conscription

Bhutan's minimum age for work is not compliant with international standards because the Labor and Employment Act allows children aged 13 to enter the labor force. Although Bhutan provides free education through grade 10, attendance is not compulsory, which may increase the risk of children's involvement in child labor. Laws prohibiting forced labor are also insufficient as they do not criminally prohibit slavery. In addition, while the Bhutanese Parliament passed the Penal Code (Amendment) Act of Bhutan 2021, which amended the legal definition of human trafficking to make the legislation consistent with international

standards for adults, it still includes the necessity of force, fraud, or coercion in child trafficking cases. Moreover, although the Royal Government of Bhutan reports that the minimum age for voluntary recruitment into Bhutan's military is age 18, the relevant Defense Service Rules and Regulations were not available for public review.

ENFORCEMENT OF LAWS ON CHILD LABOR

In 2024, labor and criminal law enforcement agencies in Bhutan took actions to address child labor. However, gaps exist within the operations of enforcement agencies, including a lack of human resources and insufficient training provided to enforcement officials, that may have hindered adequate enforcement of their child labor laws.

Agencies Responsible for Child Labor Law Enforcement	
Department of Labor (DOL) under the Ministry of Industry, Commerce and Employment (MoICE): DOL under MoICE investigates child labor complaints and ensures that employers comply with child labor laws. In addition, DOL refers cases involving the worst forms of child labor to the police and regularly inspects companies for compliance with the Labor and Employment Act. Regulations on working conditions cover issues related to child labor, hours of work, and penalties. DOL conducted trainings and labor inspections during the reporting period. In 2024, DOL employed 29 labor officials who conducted inspections, 16 at headquarters and 13 in regional offices around the country, though reporting indicates that the inspectorate is still unable to conduct sufficient investigations with its personnel. More trainings on child labor laws and regulations are needed for inspectors.	
Royal Bhutan Police: Investigate and enforce criminal laws related to the worst forms of child labor. Include dedicated Women and Child Protection Units and Women and Child Protection Desks (WCPDs) tasked with enforcing laws protecting women and children. Refer survivors of child abuse and exploitation to child welfare officers and the National Commission for Women and Children. Criminal and civil cases involving child labor are adjudicated by the Child Justice Court. During the reporting period, the Royal Bhutan Police opened a WCPD at Lhuentse, marking the establishment of a WCPD in the primary police stations in all 20 districts of Bhutan. These Desks are staffed by professionals skilled at preventing and responding to child protection violations, including violence, abuse, trafficking, and exploitation. Officials report that limited staff and insufficient trainings may hinder anti-trafficking enforcement efforts.	

Enforcement Mechanisms and Efforts	
Has a Labor Inspectorate	Yes
Able to Assess Civil Penalties	Yes
Routinely Conducted Worksite Inspections	Yes
Unannounced Inspections Permitted	Yes
Has a Complaint Mechanism	Yes
Imposed Penalties for Child Labor Violations	Yes
Conducted Criminal Investigations for Worst Forms of Child Labor Crimes	No
Imposed Penalties for Worst Forms of Child Labor Crimes	Unknown

In 2024, 29 labor inspectors conducted 3,874‡ worksite inspections, finding 2 child labor violations. It is **unknown** whether investigations into suspected cases of the worst forms of child labor were conducted, prosecutions were initiated, or perpetrators were convicted.

‡ Data are from July 2023 to June 2024.

COORDINATION, POLICIES, AND PROGRAMS

Bhutan established a mechanism to coordinate its efforts to address child labor. However, research was unable to identify specific activities undertaken by the coordinating mechanism to address or prevent child labor during the reporting period.

Key Mechanism to Coordinate Government Efforts on Child Labor

National Child Labor Task Force: Coordinates government efforts on child labor across multiple government agencies and ministries. Led by MoICE, and comprises representatives from government, international organizations, civil society, and the private sector. Although the National Child Labor Task Force was active during the reporting period, research could not determine what activities were undertaken by the Task Force to address or prevent child labor.

Bhutan established policies that may impact child labor. However, these policies do not directly address child labor or its worst forms.

Key Policies Related to Child Labor

Thirteenth National Five-Year Plan (2024–2029):* A government-wide policy aimed at economic development, social progress, and enhanced governance nationally. The policy calls for the strengthening of the Bhutanese education system through the creation of an Education Transformation Program, by increasing access to early childhood education and development, strengthening curricula, and improving education facilities and human resources. The policy also calls for expanding restorative justice programs for children. Addressing the root causes of children's vulnerability to exploitation may prevent them from being subjected to child labor or child trafficking. However, the policy does not directly address the issue of child labor or child trafficking.

* Policy was approved during the reporting period.

Bhutan funded and participated in programs that include the goal of eliminating or preventing child labor. However, these social programs lack sufficient human resources and are inadequate to address the problem in all sectors and in all areas in which child labor has been identified, including in agriculture, domestic work, and commercial sexual exploitation; additionally, a lack of data on child vulnerabilities and child protection presents challenges in targeting social programs.

Key Social Programs to Address Child Labor

Women and Children Hotlines:‡ Respond to issues related to women and children, including human trafficking cases, and provide emergency assistance and referral services. The hotline operates 24 hours a day, 7 days a week, and is staffed by trained counselors. The PEMA Secretariat, established in 2022 as the lead national organization promoting mental health and well-being, has assumed responsibility for many of the services previously handled by the National Commission for Women and Children (NCWC), including the operation of a hotline to report child protection issues and to oversee referrals to related services. MoICE, through NCWC, also has a hotline that can receive anonymous complaints about child labor abuses. MoICE's online system is for employers and employees to report complaints and accidents. The hotline was active during the reporting period.

Shelters for Vulnerable Women and Children:‡ Include Respect, Educate, Nurture, and Empower Women (RENEW), a Thimphu-based civil society organization that receives government funding and provides shelter, counseling, and survivor services for women and children who have been survivors of human trafficking. During the reporting period, RENEW operated the Gawaling Happy Home, which is a shelter that provides services to women and girls, and boys up to the age of 14, who are survivors of domestic violence, violence against women and girls, and human trafficking, with \$8,000 in government funding. Gawaling Happy Home provides counseling, legal aid, emergency medical aid, crisis intervention, meditation practice, education for children, and livelihood training. The civil society organization, Nazhoen Lamtoen Children Halfway Home, also provides shelter, counseling, and support services to children, including children in conflict with the law, such as vocational training to boys upon their release from juvenile detention centers, in part through government funding.

‡ Program is funded by the Royal Government of Bhutan.

For references, please visit dol.gov/ChildLaborReports