Mongolia

MODERATE ADVANCEMENT

In 2024, Mongolia made moderate advancement in efforts to eliminate the worst forms of child labor. The government enacted the revised Child Protection Law, which came into force in September 2024, to enhance the framework for child protection services, case management protocols, interagency coordination, and child protection mechanisms across various sectors, as well as to allocate funding for child protection services. It also developed a handbook that was used to train 400 police, prosecutors, and judges on investigating, prosecuting, and adjudicating cyber-facilitated trafficking crimes. In addition, the government opened used Child Protection Compact funding to open five child-friendly spaces for victim-centered interviewing at police stations and court houses, enabling victims of crime, including survivors of child trafficking, to provide evidence in less-traumatizing spaces. However, there remains a lack of sufficient training for labor inspectors and child rights officers to effectively identify and provide services to victims of child labor and refer suspected perpetrators for criminal investigation. Moreover, although Mongolia's Revised Labor Law authorized unannounced labor inspections that can result in penalties, confusion remains amongst inspectors as to whether unannounced inspections are permitted, which may impede the enforcement of child labor laws. Mongolia's minimum age for work provisions do not meet international standards because they do not provide penalties for violations. Furthermore, the law prohibits only children younger than 8 years old from racing horses—a hazardous form of work—which is far below 18 years of age, the country's minimum age for hazardous work.

PREVALENCE AND SECTORAL DISTRIBUTION OF CHILD LABOR

Statistics on Children's Work and Education		
Children	**Age**	**Percent and Population**
Working	5 to 14	20.7% (147,850)
Boys		24.3%
Girls		16.9%
Urban		14.7%
Rural		34.9%
Hazardous Work by Children	15 to 17	1.9% (2,673)
Boys		2.9%
Girls		0.9%
Urban		1.5%
Rural		2.8%
Attending School	5 to 14	86.4%
Combining Work and School	7 to 14	24.2%

Working Children by Sector, Ages 5-14	
Sector/Industry	**Percent of Population**
Agriculture	63.1%
Industry	8.3%
Services	28.6%

Children in Mongolia are subjected to the worst forms of child labor, including in forced begging and commercial sexual exploitation. Children also perform dangerous tasks in horse jockeying and in the agricultural sector.

Overview of Children's Work by Sector and Activity	
Agriculture	Working in agriculture, animal husbandry,† including herding.†
Industry	Working in factories, construction,† and artisanal mining.†
Services	Working in restaurants/canteens,† bars and hotels,† massage parlors and karaoke venues,† and food processing facilities.† Scavenging in garbage dumpsites, street work, begging, handling freight,† and ticket-taking for public transportation.† Domestic work, cultural performances, and horse jockeying.†
Categorical Worst Forms of Child Labor‡	Commercial sexual exploitation, sometimes as a result of human trafficking. Forced labor in begging, construction, mining, horse jockeying, animal husbandry, and circus work.

† 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 Mongolia's implementation of its international commitments to eliminate the worst forms of child labor.

Area	Suggested Action
Legal Framework	Establish legal penalties for violations of minimum age restrictions.
	Prohibit children under age 18 from participating in horse racing any time of the year.
	Address legal inconsistencies on unannounced inspections between the Law on State Inspection that requires notice before inspections and the Revised Labor Law that allows for unannounced inspections.
	Ensure that laws establishing free public education apply to all children, including non-citizens.
	Criminalize the use of children for prostitution, and ensure that the use, procuring, and offering of all children under 18 for prostitution, pornography, and pornographic performances are subject to criminal penalties regardless of whether force, fraud, or coercion are used.
Enforcement	Increase the number of labor inspectors from 66 to 87 to ensure adequate coverage of the labor force of approximately 1.3 million people and train labor inspectors on evidence collection and provisions in the Revised Labor Law and the Revised Child Protection Law.
	Establish a functional, formalized mechanism for referrals between enforcement authorities and social services, address complex case initiation and referral procedures between anti-trafficking police and prosecutors, ensure that evidence related to human trafficking cases is collected to support investigations, and ensure that child trafficking survivors are not fined, arrested, detained, or charged with crimes and administrative offenses as a result of having been subjected to human trafficking.
	Provide adequate funding for law enforcement agencies and train police officers and government officials on criminal laws related to the worst forms of child labor, including the Child Protection Law and the Law on Petty Offenses, and on procedural checklists used to identify human trafficking victims, to ensure that child labor offenses are prosecuted fully, convicted human traffickers are appropriately punished, and police discontinue the practice of detaining child survivors.
	Conduct unannounced inspections and impose penalties for violations found, and address inconsistencies on unannounced inspections between the Law on State Inspection that requires notice before inspections and the Revised Labor Law that allows for unannounced inspections.
	Publish criminal law enforcement data, including the number of prosecutions and convictions, and whether penalties are imposed for violations relating to the worst forms of child labor.
Coordination	Create formal guidelines and referral procedures for the Multidisciplinary Task Force.
Government Policies	Implement a policy to address the worst forms of child labor in the horse jockeying industry.
Social Programs	Expand existing programs to address the scope of the child labor problem and ensure that they are sufficiently funded and staffed.
	Increase the number of schools to help eliminate overcrowding, ensure that appropriate technology is available to all students, and provide infrastructure to allow full access for children with disabilities.
	Increase the length of stay on offer to children in shelter homes, and ensure that shelters are accessible to children with disabilities.

CHILDREN AT HIGHER RISK

Children without a legal guardian and homeless children abandoned by their families are more vulnerable to child labor in Mongolia. In addition, children with parents suffering from alcoholism are specifically vulnerable to hazardous labor. Mongolian girls are vulnerable to commercial sexual exploitation in communities near border towns, mining towns, or through recruitment on social media. Mongolian children working in other countries, such as China and Türkiye, especially for circuses and as horse jockeys, are at higher risk of sex and labor trafficking. In some cases, children from rural areas use the 30-day visa exemption for Mongolian citizens to cross the southern border into China to work in Inner Mongolia and other provinces, leaving them highly vulnerable to sexual and labor exploitation.

BARRIERS TO EDUCATION ACCESS

Mongolian children encounter numerous education barriers due to an insufficient number of schools, overcrowding, a lack of trained teachers, and a lack of accessibility for children with disabilities. According to educators, infrastructure for children with disabilities is generally inadequate to allow full accessibility in schools, and there is a lack of educational facilities specifically designed for students with disabilities.

LEGAL FRAMEWORK FOR CHILD LABOR

Mongolia has ratified all key international conventions concerning child labor. However, gaps exist in Mongolia's legal framework to adequately protect children from the worst forms of child labor as children aged 8 and older can jockey horses—a hazardous form of work—despite the law's proscription of [or "ban on" or "prohibition of"] hazardous work for children under 18 years old.

Laws and Regulations on Child Labor			
Standard	**Age**	**Meets International Standards**	**Legislation**
Minimum Age for Work	15	✗	Articles 4, 142, and 165 of the Revised Labor Law; Article 16.10 of the Criminal Code
Minimum Age for Hazardous Work	18	✓	Article 2-4 and 142.2 of the Revised Labor Law; Article 16.10 of the Criminal Code
Identification of Hazardous Occupations or Activities Prohibited for Children		✓	Articles 2 and 3 of the List of Jobs Prohibited to Minors; Article 10 of the Law on the National Naadam Holiday
Prohibition of Slavery, Debt Bondage, and Forced Labor		✓	Articles 13.1, 13.13, 16.4, and 16.10 of the Criminal Code; Articles 2, 3, 15, and 17 of the Law on Combating Trafficking in Persons; Article 5.14 and 8 of the Law on Labor
Prohibition of Child Trafficking		✓	Article 3 of the Law on Combating Trafficking in Persons; Article 13.1 of the Criminal Code
Prohibition of Commercial Sexual Exploitation of Children		✗	Articles 12.3, 13.1, 16.8, and 16.9 of the Criminal Code; Articles 8.1.3, 10.2, 13.2.7, and 13.2.10 of the Combating Pornography and Prostitution Act
Prohibition of Using Children in Illicit Activities		✓	Article 142.2 of the Revised Labor Law; Article 192 of the Criminal Code
Minimum Age for Voluntary State Military Recruitment	18	✓	Article 12 of the Law on Military
Prohibition of Compulsory Recruitment of Children by (State) Military		✓	Article 12 of the Law on Military
Prohibition of Military Recruitment by Non-state Armed Groups		✓	Article 29 of the Criminal Code
Compulsory Education Age	16	✓	Article 46 of the Law on Education
Free Public Education		✗	Article 16 of the Constitution of Mongolia; Articles 10.1.4, 10.1.8, 10.1.12, and 3.1.1 of the Law on Education

In 2024, the Government of Mongolia passed a revised Child Protection Law to ensure the safety, right to protection, and well-being of children, including by enhancing the national child protection system; expressly identifying employment support and counseling services to working children so that they can engage in light work under the conditions and requirements in the Labor Law, and protection and prevention from exposure to hazardous and/or the worst forms of child labor; and expressly prohibiting parents, guardians, and caregivers of children from allowing children to engage in child labor unless otherwise permitted by law. In addition, during the reporting period, the Government of Mongolia amended the Law on Combating Human Trafficking including by adding the following powers that the Government member responsible for legal matters in combatting human trafficking shall exercise: 1) to approve regulations for providing child protection services to child victims of human trafficking in collaboration with the

Government member in charge of child and family development and 2) to establish and approve the working procedures of a joint multidisciplinary task forced to provide services to child victims of human trafficking. Mongolia's minimum age for work provisions do not meet international standards because they do not provide penalties for violations of these provisions. While Mongolian law allows for penalties for certain forms of child labor that are "detrimental," there is no penalty for working under the minimum age in general. In addition, Mongolian law also prohibits only children younger than 8 years old from racing horses, which is far below 18 years old, the minimum age for hazardous work. Mongolia's laws do not expressly criminalize the use of a child for prostitution. While it does criminalize procuring and offering a child for prostitution, the force requirement is only excluded for children under 14. The criminal law prohibiting use, procuring, and offering a child for pornography and pornographic performance and suggesting prostitution to a child are not criminal in nature, as the penalties consist of fines and less than one year of imprisonment. In addition, the Constitution formally guarantees the right of free education only for citizens, potentially making it difficult for non-citizen children to enroll in school.

ENFORCEMENT OF LAWS ON CHILD LABOR

In 2024, labor and criminal law enforcement agencies in Mongolia took actions to address child labor. However, insufficient authority and training–especially for rural police and prosecutors outside the capital–unclear mandates, and a lack of funding for labor and criminal law enforcement agencies hindered enforcement efforts. In addition, in 2024 the government did not appoint a Director for the General Authority of Child and Family Development Protection (GACFDP), to be responsible for overseeing efforts to build child rights officers' capacity and improve interagency coordination.

Agencies Responsible for Child Labor Law Enforcement
Ministry of Family, Labor and Social Protection (MFLSP): In 2024, in accordance with the revised Child Protection Law, the Family, Child, and Youth Development Agency was restructured as the General Authority of Child and Family Development Protection within the MFLSP to oversee child protection issues, including child labor. The GACFDP is responsible for identifying and removing children working under hazardous conditions. It also runs a child safety complaint hotline and maintains a database that tracks the case status and social service needs of vulnerable children. In 2024, the GACFDP referred an unknown number of children to social services. The Labor Inspectorate, which also sits within the MFLSP, is responsible for labor inspections, including inspecting for violations of laws on child labor. During the reporting period, the MFLSP revised the oversight questionnaire for labor inspectors to include a section on child labor. However, labor inspectors and child rights officers are insufficiently trained and lack the capacity to effectively identify victims of child labor and refer cases for criminal investigation or to social services. In addition, labor inspectors often do not conduct unannounced inspections due to inconsistencies between the Revised Labor Law and other legislation. Furthermore, the government did not formally appoint a director for the GACFDP in 2024.
Criminal Police Department: Oversees several specialty units that enforce child labor laws, including the Anti-Trafficking Unit under the Organized Crime Division, which identifies human trafficking victims and uses referrals to open criminal investigations into human trafficking and sexual exploitation cases. The National Police Agency has assigned 53 police officers nationwide exclusively to investigate crimes against children. Cybercrimes involving children are investigated by the Division to Combat Cyber Crimes. During the reporting period, the Anti-Trafficking in Persons (TIP) Unit was designated official jurisdiction over human trafficking cases including those involving children by the Prosecutor General's Office. In addition, research indicates that a lack of training for law enforcement officials on the Child Protection Law and the Criminal Code may enable perpetrators to evade accountability, especially in rural areas. Furthermore, in 2024, the Anti-TIP Unit removed nine underage victims from exploitative situations and referred them to NGO-run shelters and services.

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	Yes
Imposed Penalties for Worst Forms of Child Labor Crimes	Unknown

In 2024, **66** labor inspectors conducted **1,487** worksite inspections, finding an **unknown** number of child labor violations. The government also conducted **2** investigations, with an **unknown** number of prosecutions initiated for suspected cases of the worst forms of child labor crimes and **unknown** number of perpetrators convicted.

COORDINATION, POLICIES, AND PROGRAMS

Mongolia established a mechanism to coordinate its efforts to address child labor. However, the mechanism lacks formal guidelines and referral procedures to open criminal investigations or provide social services which diminishes its effectiveness.

Key Mechanism to Coordinate Government Efforts on Child Labor
National Committee for Children: Established in 2018, functions as the overarching national coordinating body for child protection efforts. Headed by the Prime Minister, with the MFLSP serving as Deputy Head, and the head of the GACFDP serving as the Secretariat. Includes membership from relevant ministries, NGOs, and civil society organizations. There are also 767 individual provincial-level and township-level legal committees for children's rights that coordinate the government's legal assistance for child witnesses, crime victims, children under investigation, and children convicted of crimes. These smaller committees meet on a regular basis for individual cases related to children. In 2024, reporting indicates that the National Committee for Children was active and carried out consultations and discussions with the different sector ministries on the revised Child Protection Law.

Mongolia established a policy related to child labor. However, this policy does not address all forms of child labor, particularly in agriculture and horse jockeying.

Key Policies Related to Child Labor
National Action Plan to Respect and Protect Human Rights, Prevent, Identify, and Remedy Human Rights Abuses Committed in Business Operations: Outlines strategies for the MFLSP, the GACFDP, the Ministry of Foreign Affairs, the Confederation of Mongolian Trade Unions, and international organizations to verify that national legislation fully prohibits forced labor and the worst forms of child labor; identify child employment violations in workplaces where the employment of minors is prohibited; and conduct regular workplace inspections. In addition, organizes activities to raise awareness and understanding among employers and workers about forced labor and the worst forms of child labor. In 2024, in accordance with the National Action Plan, the Government of Mongolia passed the revised Child Protection Law to prohibit forced labor; however, children between the ages of 8-18 years are still allowed to be involved in horse jockeying—a hazardous form of work. During the reporting period, the government also conducted labor inspections; however, they were not unannounced.

Mongolia funded and participated in programs that include the goal of eliminating or preventing child labor. However, the programs lack sufficient funding and staffing to address the full scope of the problem.

Key Social Programs to Address Child Labor
Child Protection Compact Partnership (2020–2025): $6.5 million partnership among the Government of Mongolia, the United States Government, and NGOs. Consists of 18 governmental and non-governmental organizations which fund victim-centered, collaborative, and sustainable approaches to identify child trafficking victims. Created the Multidisciplinary Task Force under the National Sub-Council on Trafficking in Persons. Works with the Crime Prevention and Coordinating Council and National Sub-Council on Trafficking in Persons. During the reporting period, 700 prosecutors and judges received training on investigating, prosecuting, and adjudicating trafficking-related crimes with a particular focus on child-friendly and victim-centered approaches. In addition, a handbook was developed and used to train 400 police, prosecutors, and judges on investigating, prosecuting, and adjudicating cyber-facilitated trafficking crimes. Moreover, 125 law enforcement officers received training on forensic interviewing and how to engage and communicate with child trafficking victims. Furthermore, National Police Agency psychologists received victim-centered and trauma-informed criminal investigation training, and investigators received training on how to appropriately investigate online child exploitation cases, collect electronic evidence, work with encrypted applications, profile offenders, and conduct subject and victim interviews using proper techniques.

Key Social Programs to Address Child Labor
Child Money Program:‡ Distributes a monthly stipend to vulnerable children under age 18 and aims to prevent child labor by offsetting costs related to food, school, and clothing. Operated by the General Agency for Social Welfare and Service, the General Agency for State Registration, and the Human Development Fund. Research indicates that economic challenges, including inflation and increased unemployment, have rendered the program inadequate for covering the basic needs of children from vulnerable groups, though the program was active during the reporting period.

‡ Program is funded by the Government of Mongolia.

† The government had other social programs that may have included the goal of eliminating or preventing child labor.

For references, please visit dol.gov/ChildLaborReports