



for every child

# INVISIBLE HANDS

*Child-Centered Solutions to Address Child Labor  
in the United States*

NOVEMBER 2024

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## EXECUTIVE SUMMARY

**C**hild labor is a growing problem in the United States (U.S.), fueled by a perfect storm of increased costs of living and a growing population of vulnerable children. Much of the work to end exploitative child labor has focused on legal compliance and enforcement that pushes children out of work. This approach fails to help children who enter hazardous jobs because they face deep poverty. Pushing children out of work may inadvertently drive them into even more dangerous ways of securing income. Solutions to end child poverty must go beyond simple enforcement of child labor laws to account for the risk factors that compel children to engage in hazardous work in the first place. This report examines what puts children at risk of child labor and how to prevent child labor through child-centered solutions.

Child labor does not mean all forms of youth employment, in fact, age-appropriate employment is often beneficial for young people. Governments around the world, including the U.S., have passed laws regulating jobs and working hours that are unsafe for children. The legal working age for most jobs in the U.S. starts at 14. Different rules apply to children working for family businesses or in agriculture. Children under age 18 who are not working in agriculture must not work in the seventeen hazardous jobs specified by the U.S. Department of Labor. (See sidebar on next page.) Children ages 14 and 15 are also restricted from working certain hours during the school year and limited to a maximum number of hours per week. Additional rules around children's employment are different for each state and may be more restrictive. Ensuring children who are employed stay within the laws around children's work is the responsibility of the employer, not the child.

Between 2019 and 2023, the U.S. saw an 88 percent increase in child labor violations across the country. The risks of engaging in hazardous child labor differ for each child, but some common themes exist. Increases in child poverty are driving the recent increase in child labor in the U.S. Children in poverty at the highest risk of child labor are those with limited access to social services, children separated from their parents and migrant children. Despite this

growing problem, many states in the U.S. have introduced or passed laws weakening child labor protections, potentially increasing the safety risk to vulnerable children.

The risk factors for engaging in hazardous child labor differ across workforce sectors. This report focuses on children in the U.S. domestic supply chain, where children are exposed to dangerous jobs such as meat packing and goods manufacturing. The U.S. domestic supply chain also presents unique challenges, given the reliance on contractors and subcontractors, making it more difficult for companies to verify the age of every employee in their supply chain. With the complexities in the domestic supply chain, addressing risk factors to reduce the number of children seeking hazardous jobs is even more critical because of the challenging nature of locating exploited children once they have begun work.

## Jobs That Are Too Dangerous For Children Under Age 18

- Manufacturing and storing of explosives
- Driving a motor vehicle and being an outside helper on a motor vehicle
- Coal mining
- Forest fire fighting and fire prevention, timber tract management, forestry services, logging, and saw mill occupations
- Power-driven woodworking machines
- Exposure to radioactive substances
- Power-driven hoisting apparatus
- Power-driven metal-forming, punching, and shearing machines
- Mining, other than coal mining
- Meat and poultry packing or processing (including the use of power-driven meat slicing machines)
- Power-driven bakery machines
- Balers, compactors, and paper-products machines
- Manufacturing brick, tile, and related products
- Power-driven circular saws, band saws, guillotine shears, chain saws, reciprocating saws, wood chippers, and abrasive cutting discs
- Wrecking, demolition, and shipbreaking operations
- Roofing operations and all work on or about a roof
- Excavation operations



Source: U.S. Department of Labor, [webapps.dol.gov/elaws/whd/flsa/docs/haznonag.asp](https://webapps.dol.gov/elaws/whd/flsa/docs/haznonag.asp)



Reducing the number of children in hazardous jobs will help employers avoid costly child labor violations and protects children from harm. By also addressing the risks that push children into hazardous child labor, the U.S. may be able to prevent hazardous child labor while safeguarding children. For children already engaged in child labor, communities must prioritize protecting children from “falling through the cracks,” by transitioning children out of hazardous work and connecting them to social services and safer forms of work. In short, reducing the risk of child labor requires a community response that includes governments and the private sector.

Thus, research-supported recommendations include:

**Government:**

1. Bolster the social safety net to increase access to services for children with limited access, in particular, rural families in poverty and migrant families.
2. Redirect funds from the penalties paid by companies that violate U.S. child labor laws to create a funding source for child-serving organizations.
3. Introduce child labor education programs in schools across the United States, with a focus on areas of greatest risk for children entering hazardous jobs.
4. End State rollbacks of child labor protections.
5. Increase inspections of hazardous workplaces by the Department of Labor, with a focus on inspections outside of standard working hours.
6. Calculate child labor fines based on the value of the company that has violated child labor laws.
7. Codify the Federal Interagency Task Force to Combat Child Labor Exploitation.

**Private Sector:**

1. Support local child-serving non-profits in communities where companies have a large presence.
2. Support child labor training for professionals who work with children to identify and assist children engaged in child labor.
3. Develop child labor detection and prevention training for all staff within an organization.
4. Adopt best practices in child labor regulation compliance as outlined in the UNICEF USA Child Labor Compliance Framework and Resource Repository

5. Establish partnerships with schools in communities where companies have a large presence to identify children who may be engaged in work, provide workforce training opportunities, and educate youth about their rights in the workplace.
6. Strengthen the age verification system so that companies can verify the ages of employees in contracted and subcontracted companies.
7. Establish partnerships with legal service companies to establish protocols to assist children when child labor violations happen.

## INTRODUCTION AND KEY FINDINGS

Child labor in the U.S. domestic supply chain presents a risk to children and companies. Child labor laws in the U.S. specify seventeen occupations that are too hazardous for children to engage in. Additional protections are provided to children around working hours and mandatory breaks. Unique laws exist for children involved in agricultural work and family businesses. Given the nuances in U.S. child labor laws, this report focuses on child labor within the U.S. domestic supply chain, including raw materials inputs, raw materials processing, material transformation, and final product assembly. This part of the workforce deals with complex corporate partnerships, contracts, and subcontracts, making accountability difficult because many companies do not check the ages of employees in contracted or subcontracted companies.

With the goal of protecting children from harm, solving the issue of child labor in the U.S. supply chain must go beyond accountability for employers and address the risk factors that drive children into hazardous work. Children engaged in hazardous work do so out of poverty and need. Removing children from hazardous occupations may inadvertently push children into more desperate and potentially dangerous ways to secure income. To protect children from poverty and child labor, solutions should address the risk factors that push children to engage in hazardous employment.

This report draws on scholarly, policy, and media sources to understand poverty as a leading risk factor for children entering work that violates their labor rights. This analysis highlights how changes in the U.S., like the tighter labor market and rising living costs, have worsened the link between poverty and child labor. These findings also capture broader population and policy issues that have compounded child labor in the U.S., including an influx of vulnerable migrant children and the move by some states to weaken child labor protections.

Mitigating the risks that drive children into child labor in the domestic supply chain requires a community-level response. Children most often engage in hazardous forms of work out of need

for income. Thus, combating child poverty is paramount in preventing child labor. Accordingly, government and private industries that aim to reduce child labor are encouraged to focus on reducing child poverty first. In addition, access to education and accurate information about child labor is central to reducing child labor while respecting children's agency, particularly for child migrants who may have a different understanding of what appropriate work for a child might be. Existing programs to educate children and employers on local child labor laws have demonstrated an impact in preventing child labor and identifying child labor when it happens.<sup>1</sup> Lastly, reducing hazardous forms of child labor means addressing the issue while protecting children from poverty. To assist children who are engaged in child labor, efforts to identify children early and connect them with necessary social services can safely transition children out of hazardous work and into appropriate employment opportunities and training.



**REDUCE CHILD POVERTY** **REDUCE CHILD LABOR**

**To reduce child poverty, Government should:**

- Bolster the social safety net to increase access for rural families in poverty and migrant families
- Redirect child labor fines to fund child-serving organizations

**Private sector should:**

- Support local non-profits



**EDUCATE ON CHILD LABOR** **REDUCE CHILD LABOR**

**To educate on child labor, Government should:**

- Introduce child labor education programs in schools

**Private sector should:**

- Support trainings for professionals working with children
- Develop child labor detection and prevention workforce trainings





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**To prevent and address harm,  
Government should:**

- End state rollbacks of child labor protections
- Increase inspections
- Calculate child labor fines according to the value of the company
- Codify the federal interagency task force to combat child labor exploitation

**Private sector should:**

- Adopt best practices in compliance as outlined in the UNICEF USA Child Labor Compliance Framework and Resource Repository
- Strengthen age verification system for contractors
- Partner with schools in communities where corporations have a large presence
- Establish partnerships with legal-service organizations

## RATES OF CHILD LABOR IN THE UNITED STATES

**A**n estimated 160 million children, or 1 in 10, are entangled in child labor worldwide.<sup>2</sup> In the U.S., child labor is part and parcel of the history of American industry and labor force development but fell out of favor in the U.S. as children moved from “economically useful” to “morally priceless.”<sup>3</sup> Since the passage of the Fair Labor Standards Act (1938), which barred certain types of labor for distinct categories of youth as described in greater detail below, and in conjunction with compulsory child education laws, child labor has been largely out of sight in the U.S. as exploitative child labor has been perceived to be relegated to countries beyond its borders.

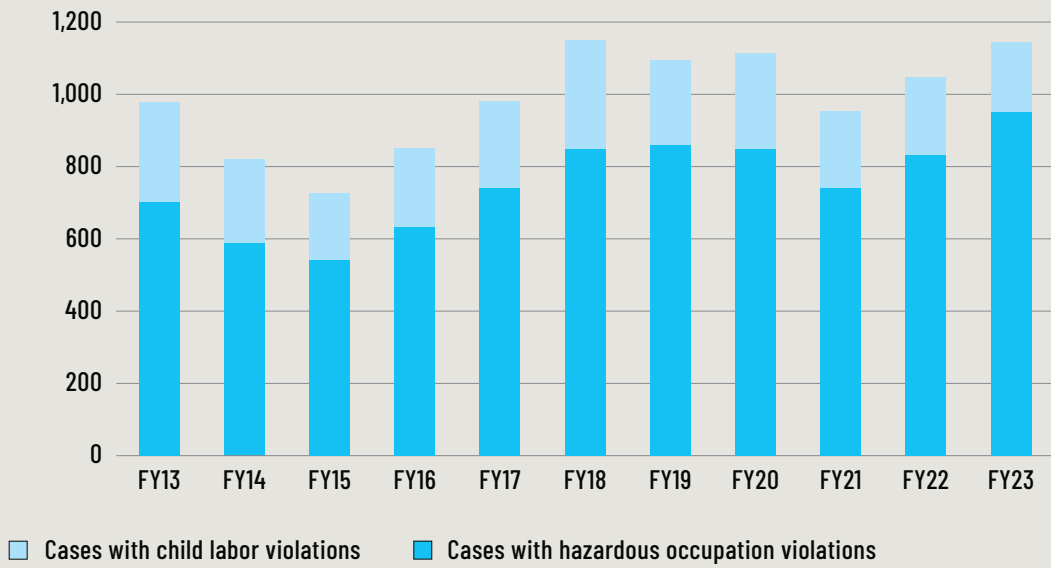
The Department of Labor outlines sixteen non-hazardous jobs that children 14 and older may legally perform in the U.S., such as pricing and tagging goods and pumping gas. It also outlines seventeen hazardous occupations that children under 18 may *not* legally perform in the U.S., including exposure to woodworking machines, meat and poultry packing or processing, and any work requiring the use of heavy, power-driven machinery (See Table 1 and Table 2 in Appendix).

Despite clear regulations on the types of jobs underage children can do, how often and for how long, child labor violations are a persistent issue in the U.S. Between 2019 and 2023, the Department of Labor noted an 88 percent increase in child labor violations, up to 955 in fiscal year 2023 from 858 in fiscal year 2019. The number of children affected during this time increased sharply, from 3,073 children employed in violation of child labor policies in Fiscal year 2019 to 5,792 children in fiscal year 2023.

Dating back further, from the lowest levels in 2015 and to current estimates in 2023, cases of child labor violations increased by 76 percent, while the rates of minors employed in violation of their rights rose by 472 percent (see Figure 1 on next page).<sup>4</sup> On average, about six minors are involved in each case of child labor violation reported by the Department of Labor (see Figure 2 on next page).<sup>5</sup> While egregious, these estimations are an undercount, as many child

FIGURE 1

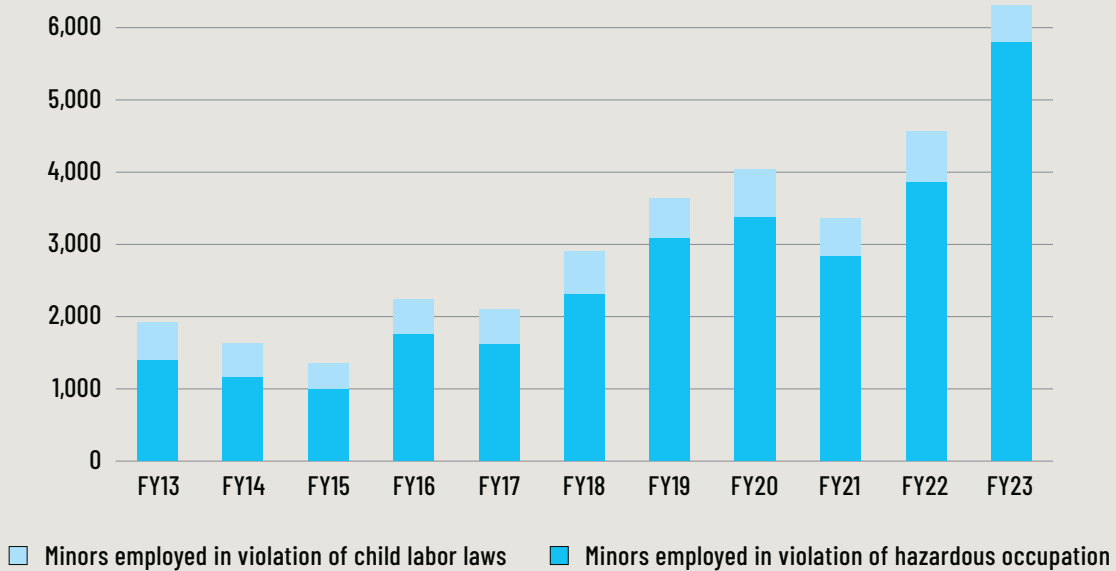
## Cases of Child Labor and Hazardous Occupation Violations



Source: U.S. Department of Labor, [dol.gov/agencies/whd/data/charts/child-labor](https://dol.gov/agencies/whd/data/charts/child-labor)

FIGURE 2

## Minors Employed in Violation of Child Labor Laws and Hazardous Occupations



Source: U.S. Department of Labor, [dol.gov/agencies/whd/data/charts/child-labor](https://dol.gov/agencies/whd/data/charts/child-labor)

labor violation cases are unreported due to fear of employer retaliation and understaffing of auditors with the U.S. Department of Labor. Importantly, there is also no publicly available data on child labor violations among children under age 14 in the U.S., leaving a significant gap in the understanding of this issue in the U.S. and contributing to its undercount.

By 2023, reports of child labor exploitation, injury, and death surged into the mainstream media due to findings that increasing numbers of unaccompanied child migrants arriving in the United States without parents or guardians or legal status were found to be employed in hazardous occupations in violation of their rights.<sup>6</sup> In 2023, 835 companies in the U.S. were reportedly employing children in violation of child labor laws.<sup>7</sup>

Currently, children's labor rights are most frequently violated in the form of hours worked by and occupations employing 14- and 15-year-olds, the employment of 16- and 17-year-olds in hazardous occupations, and the illegal employment of children under the age of 14.<sup>8</sup> As states move to lower the bar on child labor protections, more children are at risk of being employed in violation of their rights.

Despite insights on trends across years and within industries, there is a lack of data documenting child labor rates across employment sectors, primarily within hazardous occupations. Although there is a lack of publicly available data for analysis by experts in the field, such as data on labor violations in children under age 14, that data is available to the government and employers who have received citations for labor violations. These data gaps create challenges for employers in sectors such as the U.S. domestic supply chain to address child labor and to understand the depth and breadth of the issue.

# ORIENTING TO THE LEGAL AND POLICY LANDSCAPE OF CHILD LABOR

## International Framework: A Global Perspective on Child Labor Rights

**T**he International Labor Organization (ILO) and UNICEF have led the conversation on the international recognition of workers' global human and labor rights, including child workers. The ILO defines "child labor" as "work that deprives children of their childhood, their potential, and their dignity, and that is harmful to physical and mental development."<sup>9</sup> The ILO also uses "child labor" to refer to "work that is mentally, physically, socially or morally dangerous and harmful to children and/or interferes with their schooling by depriving them of the opportunity to attend school; obliging them to leave school prematurely; or requiring them to attempt to combine school attendance with excessively long and heavy work."<sup>10</sup> However, each country specifies which types of work falls under the umbrella of "hazardous work" or "labor exploitation," creating a unique set of laws and regulations in each country or even each state within a country.

Importantly, different countries and communities culturally define the meaning of childhood and work in distinct ways; therefore, foreign-born children in the U.S. might understand the meaning of work differently based on their cultural upbringing. Studies

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- International organizations, like the International Labor Organization and UNICEF, set international standards to define child labor. However, each country sets their own legal definition of child labor.
- In the U.S., the Federal government sets minimum standards for child labor laws and allows states to establish additional protections.

suggest that foreign-born children associate work, even in childhood, with unique cultural definitions of independence, care, and autonomy.<sup>11</sup> Thus, while international agencies create standardized definitions of child labor and hazardous work, children do have agency and may interpret their work lives and identities at young ages differently.<sup>12</sup> In the absence of education on child labor laws in each country, children may not interpret their employment – even in hazardous roles that pose a risk to their physical and emotional safety – as problematic.

## **U.S. Federal Framework: The Fair Labor Standards Act of 1938**

In the U.S., labor is governed by The Fair Labor Standards Act (29 U.S.C. § 203). The Fair Labor Standards Act (FLSA) was signed in 1937 and enacted in 1938 and dictates that children are permitted to work in the U.S. after age 14, but some sectors of the workforce are too hazardous for children. At ages 14 and 15, children cannot work during certain hours when school is in session, have limited hours per week, and are not permitted to work in hazardous jobs (listed in Appendix A, Table 2). Children ages 16 and 17, have no restrictions on the hours they can work, but they are still not permitted to work in hazardous occupations. Restrictions for children working in agriculture or working for parents, such as in a family company, differ significantly.

The Department of Labor is tasked with enforcing child labor laws when children's rights are violated under the FLSA. The first penalty for violations is \$15,138 per violation. This is a recent change away from a penalty per child; under newer regulations, an employer can receive multiple violations per employee if a child is employed in violation of multiple regulations. Enhanced penalties of up to \$68,801 are levied against employers each time a violation causes death or severe injury to a child employee.<sup>13</sup> Penalties can increase for repeat violations or if evidence indicates that the violations were willfully committed.<sup>14</sup> Fines are the same for every organization, regardless of the organization's size or resources. In effect, fines are more impactful for smaller companies, whereas many large corporations may find penalties insignificant.

More concerning is the under-resourced workforce in labor inspections within the Department of Labor. Indeed, recent investigative reports document that Department of Labor audits and inspections, which occur between the typical work hours of 9 A.M. to 5 P.M., are bound to miss the hundreds of child labor violations during overnight shifts in plants and factories across the U.S. Child labor inspections within the Department of Labor suffer from chronic underfunding and understaffing, leaving the Department unable to monitor hazardous workplaces effectively.<sup>15</sup>

In addition to efforts to enforce existing child labor regulations, the U. S. federal government is taking measures to assist children who are engaged in hazardous labor. At the U.S. federal



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- Despite recent increases in child labor violations, some states have reduced legal protections for children in the workplace.
- States must ensure the safety of vulnerable children by prioritizing and increasing children's protections in the workplace.

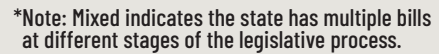
government, the Interagency Task Force to Combat Child Labor Exploitation pulls together federal agencies from across the government to provide comprehensive solutions to child labor in the U.S. Most recently, the Interagency Task Force has focused on enforcing existing child labor laws, increasing education about child labor to the public, and expanding innovative partnership to reduce child labor such as connecting with embassy leadership from several Central American countries to share tools and resources. Notably, the Interagency Task Force includes members from the U.S. Department of Health and Human Services, which oversees most of the U.S. social safety net and services for children. This collaboration has led to calls for actions to support children at the highest risk of child labor, such as the Interagency Task Force's recommendation that the Office of Refugee Resettlement expand post-release services for unaccompanied children and mandate follow-up calls for unaccompanied children that report safety concerns<sup>16</sup> Unfortunately, the Interagency Task Force has not been codified, which leaves the Task Force with limited authority and vulnerable to changes in Administration.

## **U.S. States' Legal Frameworks: Redefining the Parameters of Child Labor Protections**

Through the Fair Labor Standards Act, the federal government sets the floor for child labor standards; it is typically up to states to define the ceiling. States labor laws are varied. Many states require that minors obtain employment certificates or work permits to demonstrate their eligibility to work, including through proof of age, parental permission, medical clearance and/or school authorization.<sup>17</sup> When states implement stronger child labor laws than the FLSA, employers are obliged to comply with whichever laws are most restrictive, prioritizing the highest possible protection of children.

Several states have tried to provide additional protections beyond these minimums. Indeed, in 2024, seven states strengthened child labor protections. Another six, however, moved to weaken child labor laws, even as child labor violations are on the rise. Since 2021, legislators in thirty-one states have introduced over 60 bills to change labor restrictions for minors, ranging from working more hours in the day, more days per week, and without parental consent (see Figure 3 on next page).<sup>18</sup>

## Status of Bills to Weaken Child Labor Protections in the United States, 2024



Source: Data from the Economic Policy Institute, "Child Labor." Retrieved August 1, 2024.  
[epi.org/research/child-labor/](https://epi.org/research/child-labor/)

Examples of state bills enacted since 2023 include:

1. **Arkansas HB 1410:** Passed in March 2023, this bill repeals the state’s employment certificate (work permit) requirement for children seeking employment under the age of 16. It also eliminates the requirement that an application for an employment certificate include proof of age and consent from a parent, among other features.
2. **Iowa SF 542:** Passed in May 2023, this bill increased the number of hours 14-year-olds can work, up two hours from four hours on a school day to six.
3. **West Virginia HB 5162:** Passed in March 2024, this bill creates an apprenticeship program for high schoolers, permitting them to work in hazardous jobs such as roofing and manufacturing.

# THE COSTS OF LABOR FOR CHILDREN'S DEVELOPMENT AND FUTURES

**R**esearch shows that when supervised and confined to specific ages, hours, tasks, and conditions, work can support children's development of valuable skills and positive identity formation for young people in their transition to adulthood.<sup>19</sup> Particularly, in late adolescence, employment can help promote mobility in future employment opportunities as youth develop social capital and valuable skills.<sup>20</sup>

Unfettered, however, child labor can have severe consequences on a child across the life course.<sup>21</sup> Early intensive childhood labor can have detrimental effects on children's development. Working 20 hours or more per week is negatively associated with academic achievement and ambition.<sup>22</sup> Beyond 20 hours, children have less time to focus on schoolwork, are limited in their ability to participate in afterschool activities and extracurricular programs and feel alienated from teachers and peers.<sup>23</sup> Moreover, working longer and later hours can "disrupt the sleeping patterns of youth, which can hinder their brain development and their learning abilities," suppressing children's cognitive development.<sup>24</sup>

Physically, children have historically lost their limbs and lives in canneries, mills, factories, mines, and farms across the U.S. The FLSA was intended to bring an end to these fatalities. Yet today, children are not exempt from fatal injuries. For example, the Labor Department reports that a 14-year-old boy in Nebraska was not only suffering academically because he was "falling asleep in class," but that the boy was "missing class as a result of suffering injuries from chemical burns" from work cleaning meat cutting machines 2021 to 2022.<sup>25</sup>

Education is often perceived as a child's way out of poverty. Yet, child labor can negatively affect children's short-term educational success, as children are "rarely able to make up lost ground" in academic achievement.<sup>26</sup> This risks children's long-term economic mobility, potentially perpetuating the need for child labor among future generations.

## POVERTY, MIGRATION, AND CHILD LABOR IN THE U.S. SUPPLY CHAIN

**H**istorical accounts demonstrate that the connections between child poverty and child labor in the U.S. are not new. Instead, the recent rise in child labor in the U.S. supply chain may be understood as a reincarnation of the U.S. labor market's historical reliance on low-wage workers to maintain profit margins.<sup>27</sup>

For many, “low-wage, high-stress manufacturing firms simply could not compete for native workers with the low-wage service sector firms.”<sup>28</sup> Jobs typically reserved for teenagers entering the labor market, like fast-food jobs, became more attractive to non-college-educated U.S.-born adults as “wages were comparable, but the work was air-conditioned,” as one study noted.<sup>29</sup> As teenagers were displaced from their typical jobs, many entered workplaces that were undesirable to U.S.-born adults, including low-wage, high-stress manufacturing jobs in the U.S. supply chain. Relying on uneducated and undereducated, U.S.-born groups would not be enough to replenish the low-wage workforce. Thereby prompting employers to turn to immigrants, including the unauthorized, to fill job vacancies.<sup>30</sup>

Whereas prior waves of low-wage labor migration to the U.S. have consisted of single adults, today's low-wage migrant workers include unaccompanied children.<sup>31</sup> While child migrant labor in the U.S. has been documented as far back as the early 20th century in railroad and agricultural industries, today's rates of unaccompanied child migrants make

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- Manufacturing jobs have struggled to compete with the service sector for low-wage workers. Migrants, including child migrants, have filled in vacancies in many manufacturing jobs.
- Education and paid workforce training for youth may help young people, particularly migrant youth, to learn about U.S. labor laws and find age-appropriate employment.

child migrants among the most exploited workers in meatpacking, poultry sanitation, roofing and other hazardous occupations in the U.S. domestic supply chain.<sup>32</sup> During the COVID-19 pandemic, school closures prompted children to leave school.<sup>33</sup> Many children began working and did not return to school after their reopening.<sup>34</sup> At the same time, increased migration brought children who were often workers in their origin countries into the U.S.<sup>35</sup> As U.S.-born adult workers were unwilling to engage in jobs considered unsafe, low-paying and otherwise socially undesirable,<sup>36</sup> newly arrived migrant children became rank-and-file workers in the U.S.<sup>37</sup>

The COVID-19 pandemic drastically worsened economic inequality and created institutional disruptions that reversed previous years of progress in mitigating child labor in the U.S.<sup>38</sup> The pandemic's global effect included mass inflation and high unemployment rates. Widespread job losses pushed many families into poverty. As a result, more children were forced to work to supplement household incomes and in increasingly dangerous jobs.<sup>39</sup> As in the decades of job deregulation and degradation following deindustrialization in the 1970s, "adults have moved into industries that used to employ mostly youth, [...] kids are competing with adults for these jobs. [...] The more difficult we make it for low-income kids to find employment, the more likely those kids are to try to make money in more dangerous ways."<sup>40</sup>

With a tightening labor market, both U.S.-born and migrant children are displaced from jobs traditionally associated with youth. Migrant children and many U.S.-born children are unlikely to know U.S. labor laws well enough to understand which jobs are not permitted for children. Educating children on child labor laws empowers children to make safer choices in the jobs they pursue. Additionally, providing paid and age-appropriate workforce training programs through schools allows children to combine the benefits of education with the financial support of employment.

# THE DISPROPORTIONATE BURDEN OF POVERTY

## Children at Highest Risk of Child Labor

Income and wealth inequality in the U.S. has risen drastically, pushing more children and their families into poverty over the last several decades. Poverty affects children's short- and long-term wellbeing,<sup>41</sup> and puts children at higher risk of engaging in hazardous child labor.

Clear throughout history is that children growing up in impoverished families with fewer resources for survival and mobility are among the most likely to engage in hazardous work to survive. In these cases, child labor is a strategy of "transferring resources from the future to the present."<sup>42</sup> Poor and low-income families engage in a "brutal trade-off" in which individuals and families make difficult decisions between surviving and thriving.<sup>43</sup> The urgency of financial decisions in the face of adversity in the present might come at the expense of investments that promote mobility in the future. These trade-offs reproduce intergenerational poverty and ongoing child labor within families.<sup>44</sup>

Poor and low-income children can begin work for various short and long-term reasons. A recent study of the motivations for child migrant labor in California revealed that housing insecurity, experienced as both the actual or perceived loss of housing or the feeling of being in danger within one's household, is among the leading reasons for children's engagement in exploitative low-wage labor in the state<sup>45</sup>, indicating poverty, the cause of housing instability, as one of the primary motivations for children to seek hazardous labor. Reducing child labor must start with the causes of child labor, prioritizing a reduction of child poverty through

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- Child labor is an issue of poverty, children in poverty seek work out of need. Reducing child poverty should be the priority toward reducing child labor.
- Government should take action to reduce child poverty through bolstering the social safety net and increasing access to existing safety net programs.



bolstering the social safety net and supporting non-profit organizations working to end poverty. Chronic underfunding of the social safety net in the U.S. has limited the government's ability to address poverty adequately. Identifying new sources of revenue, such as the fines paid to the Federal Government for child labor violations, may be necessary to bolster the social safety net. Additionally, corporate contributions to non-profit organizations, including corporate sponsorship of foundations and charity organizations often serve as a financial lifeline for child-serving organizations.

## Increased Risk of Poverty and Child Labor in Rural U.S.

Economic distress is found across the U.S. One in five children in the U.S. today lives in poverty, with higher concentrations of poverty in rural regions. One in four children in rural U.S. regions lives in poverty today, a rate that increases for rural children of color.<sup>46</sup> Children experience poverty differently according to their geographic location.<sup>47</sup> While there are many benefits to rural life for children, researchers largely agree that "rural areas can exacerbate many of the challenges of childhood poverty," primarily due to the absence of social services and safety nets.<sup>48</sup> Children in rural areas might be more likely to engage in hazardous work to survive, particularly within the U.S. domestic supply chain.

For at least the last half century, employment hardship has consistently been greater for rural workers than for urban workers.<sup>49</sup> Unemployment and underemployment have persisted in rural areas, evinced as involuntary part-time workers and low-income full-time workers. Labor markets in rural regions are increasingly reliant on foreign-born workers and younger workers.<sup>50</sup>

While deindustrialization contributed to the rise in poverty in rural areas where manufacturing in the U.S. supply chain is concentrated, the recent move of some corporations into rural regions to take advantage of low land and labor costs has spurred interest in the prospects of economic development.<sup>51, 52</sup> Some corporations rely on contractors to hire local low-wage workers and draw in immigrants searching for work,

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- Rural Americans in poverty have less access to social safety net programs from government and many manufacturing jobs are in rural regions of the U.S., providing hazardous work in regions where few alternatives exist.
- Government should work to improve access to the social safety net in rural America.
- Private industry can support local non-profits in rural regions to reduce child poverty.

including migrant children. As populations grow, more housing and commercial buildings are needed, prompting the need for more construction workers, including children.<sup>53</sup> This creates a market where rural children see opportunities in domestic supply chain jobs despite hazardous conditions.

Facing poverty and limited access to the social safety net, rural children engage in low-wage labor as a strategy to climb out of poverty. And because manufacturing, meat processing and packing, and other supply chain industries are concentrated in rural regions, child workers can be drawn into these dangerous occupations. Minimizing the risk of child labor in rural regions must begin with addressing rural poverty. Many rural regions of the U.S. have limited access to poverty reduction programs. Many rural regions lack benefits, such as soup kitchens and homeless shelters. Where services exist in rural regions, the absence of public transportation can make it impossible for impoverished rural families to access them. Bolstering the social safety net and supporting local non-profits, with a focus on increasing access to benefits, is necessary to decrease rural poverty and begin to address the drivers of rural children into child labor.

## Urban Children Separated from Parents and Caregivers

Child poverty is experienced differently in different groups of children. Children in urban regions, for example, may not face the same barriers to accessing social safety net programs that children in rural regions experience. Yet, in urban communities, children separated from their parents/caregivers represent a population at elevated risk of child labor. Although there are many reasons children may be separated from their parents, three groups stand out: (1) children with incarcerated or detained parents, (2) foster youth, and (3) unaccompanied child migrants.

About 2.6 million children have a parent, most commonly a father, currently incarcerated.<sup>54</sup> These children live predominantly in urban centers in the U.S. In urban communities, where higher rates of children separated from their parents and caregivers live, the U.S. domestic supply chain can often be found on the outskirts of the city. Processing and packaging plants present urban youth, separated from their caregivers, with an opportunity for financial security and a sense of stability.<sup>55</sup>

Foster children are also separated from their adult caregivers as minors, and some never regain a secure attachment to a primary caregiver. As of the most recent estimates, there are approximately 355,000 children in foster care in the United States.<sup>56</sup> About 20,000 children age out of foster care without ever being adopted into a family each year, instantly losing access to the support previously provided by the child welfare system.<sup>57</sup> Children in foster care have high rates of school dropout.<sup>58</sup> Foster youth who have dropped out of school and face imminent risk of independence without support are at risk of hazardous child labor as they plan for their independence while still in care.<sup>59</sup>

**REDUCE  
CHILD  
POVERTY**

**REDUCE  
CHILD  
LABOR**

- Youth without parents/caregivers seek employment out of poverty and to prepare for adulthood where they may be cut from any support they receive as children.
- Government must ensure children don't fall through the cracks when they leave hazardous work by prioritizing the safe transition of children into social services and/or safe employment.
- Private industry can support non-profits working with youth, and child labor education programs to help youth find safe work.

Another sizable population of children in the U.S. without the support of a parent or caregiver are foreign-born children who enter the country alone. Unaccompanied child migration to the United States from Latin America has been on the rise over the last decade. Facing extreme poverty, violence, and other significant threats in their home countries, children migrate for survival and to help their families.<sup>60</sup> In many cases, children envision doing so as workers in the U.S. because they were already workers in their origin countries.<sup>61</sup> In the U.S., unaccompanied migrants are among the most exploited child workers.

Since 2021, over 437,000 unaccompanied migrant children have been released to sponsors in the U.S. Sponsors are “adults who are deemed by the U.S. Department of Health and Human Services’ Office of Refugee Resettlement (ORR) to be suitable to provide for the child’s physical and mental well-being and have not engaged in any activity that would indicate a potential risk to the child.”<sup>62</sup>

Several forces coalesce to prompt unaccompanied migrant children’s entry into hazardous work. Upon children’s release from ORR custody, sponsors become immediately responsible for children’s needs regardless of how well-resourced they are. Unaccompanied children have significant needs, including migration debt and financial obligations to left-behind families.<sup>63</sup> Since removal orders against unaccompanied children are activated at the time of ORR release, children and sponsors must immediately secure legal counsel to combat deportation.<sup>64</sup> In 2022, the most recent publicly available data, 44 percent of children receive federally funded Post-Release Services, typically through 30-60-90-day virtual check-ins, leaving the majority of children and adult sponsors with little help.<sup>65</sup>

Children released to sponsors in urban regions encounter high costs of living, underfunded schools and a high risk of poverty. These children might enter the domestic supply chain through urban manufacturing and food packing plants.<sup>66</sup> Children are also being increasingly released to sponsors in rural regions of the U.S., where the social safety net is minimal and difficult to access. The persistence of manufacturing factories, alongside the growing

number of food production and packing factories in rural U.S. regions, draws in children seeking stability and financial support.<sup>67</sup> Business and labor booms promote private and commercial construction booms, creating jobs that may not be appropriate or safe for children. This demand draws in unaccompanied child laborers in construction, including the extremely dangerous job of roofing.<sup>68</sup>

Children who grow up separated from and/or unaccompanied by a parent or other adult caregiver experience the urgent financial burden of lacking an adult to either absorb or offset the cost of living.<sup>69</sup> Reducing rates of child labor for children separated from parents and caregivers requires addressing the root causes of child labor, including poverty and, in many cases, education about child labor laws in the U.S. Additionally, children that have been separated from parents and caregivers lack the support necessary to transition out of child labor without falling into more desperate circumstance. Legal services may be necessary to support foster children or unaccompanied migrant children in accessing appropriate services. For children of incarcerated or detained parents, linkages to social services are needed, highlighting the importance of the U.S. Interagency Task Force to Combat Child Labor Exploitation.

# CHILD-CENTERED SOLUTIONS TO REDUCING CHILD LABOR

Protecting children from hazardous work in the U.S. supply chain begins with protecting children from the risks that lead them into child labor in the first place. Enforcement of existing laws alone is insufficient to protect the wellbeing of children. Government and private sectors have a significant role to play in preventing child labor. At its most basic, the issue of child labor is an issue of poverty. Children engage in hazardous employment in response to poverty. Addressing child labor through punitive approaches that push children out of employment increases the risks that children will engage in even more desperate means to secure necessary income. Enforcement of child labor laws must be paired with supportive services to address the risk of child labor to ensure vulnerable children do not “fall through the cracks.” Children at increased risk of engaging in child labor in the U.S. domestic supply chain include children in poverty, migrant children, children separated from their parents or caregivers and children with limited access to the U.S. social safety net.

## Government

Government interventions in child labor prevention and child worker protections should reflect the systemic conditions from which child labor is born. To this end, considerations include:

### To reduce child poverty:

1. **Bolster the social safety net to support children in or at-risk of poverty, particularly for rural and migrant families.** Increasing support for low-income families, U.S. born children of incarcerated, detained, and deported parents, foster children transitioning out of care,

and children in very rural areas is essential for lowering rates of child labor. Focused efforts at increasing access to the social safety net in rural regions and for migrant children is particularly important to address risk factors for vulnerable children. One in four rural children live in poverty<sup>46</sup> and poverty rates for migrant children in the U.S. are roughly twice that of non-migrant children, yet these populations of children often have the lowest access to poverty reduction programs. Poverty reduction programs for children and families can range from direct cash transfers such as fully refundable tax credits, to food support programs such as the SNAP food assistance program, or housing stability programs such as the Housing Choice Voucher Programs known as Section 8. Some of the U.S. poverty reduction programs are not available to all migrant families, particularly for undocumented families, leaving migrant families with minimal support. Targeted financial support for migrant families and unaccompanied migrant children could come in the form of access to the U.S. social safety net, stipend programs for sponsors of unaccompanied migrant children, and/or increased and ongoing support for children leaving the care of the Federal Office of Refugee Resettlement after arriving in the U.S.

2. **Redirect child labor fines to create a funding source for child serving organizations.**

When child labor is identified, corporations must pay the government thousands, if not millions, of dollars in fines. In 2024 alone, the U.S. Federal Government took in \$15.1 million in fines levied against employers that had violated child labor laws.<sup>70</sup> Funds paid to the government because of child labor should be directed to addressing the causes of child labor, primarily, child poverty. The Department of Labor can redirect funds collected through child labor fines to establish a grant fund, allowing child serving social service organizations to apply for grant funding out of the funds each year.

**To educate on child labor:**

3. **Introduce child labor law education programs in schools.** Particularly in regions of the country with higher numbers of migrant and displaced children, children may not be aware of the legal protections that they have in the workplace. Providing child labor and workers' rights education in the public school system empowers children to understand their rights and the risks of engaging in work that violates their rights.

**To prevent and address the harms of child labor:**

4. **End state rollback of child labor protections.** As child labor violations are on the rise, some states have chosen to lower the bar on child labor protections. Lowering protections for vulnerable children puts more children at risk of harm. In 2024, Alabama, Colorado, Minnesota, Nebraska, Oregon, Utah and Virginia signed bills into law to strengthen child labor protections in those States.<sup>71</sup> These seven States serve as role models to the nation and have demonstrated their commitment to protecting vulnerable children.



5. **Increase resources for inspections of hazardous workplaces, targeting inspections outside of standard working hours.** As previously noted, chronic under-funding of child labor enforcement at the Department of Labor has left staffing levels for compliance inspection at impossibly low levels, resulting in audits that are only conducted during 9:00am-5:00pm working hours. A 2023 New York Times investigation unveiled inspector staffing levels at the Department of Labor had become so low it would take an estimated 100 years for inspectors to visit every workplace in their jurisdiction.<sup>9</sup> Transitioning children out of hazardous labor must begin with identifying those children and connecting them with appropriate services. Inspections alone are insufficient to protect children from the risk factors that drive children into exploitative labor, however, identifying child labor is an essential step in transitioning children out of hazardous labor.
6. **Calculate child labor fines according to the valuation of the company.** Many models exist to calculate fines based on the resources available to a company, including at the Federal government where agencies such as the Environment Protections Agency and the Securities and Exchange Commission provide a process to ensure fines are sufficient to deter even very wealthy companies. In some instances, fines are set high and companies that cannot pay can appeal for a lower fine. In other instances, the Federal Government recognized the importance of deterrence by calculating fines based on a number of factors including the company's resources.<sup>72,73</sup> Tailoring penalties to the level of resources available to the company ensures that the fines serve as a deterrence to every company.
7. **Codify the Federal Interagency Task Force to Combat Child Labor Exploitation.** By codifying the Interagency Task Force to Combat Child Labor Exploitation, the Task Force would be given more legal authority and would establish a permanent place in government that is less subject to changes in Administration. A permanent Interagency Task Force to Combat Child Labor Exploitation with a mandate to protect the rights of children who work is in a better position to integrate services for children engaged in child labor, and transition children out of child labor and into appropriate services. The Department of Health and Human Services, which oversees many programs to support families in poverty and migrant children, sits on the Interagency Task Force to Combat Child Labor Exploitation and offers an opportunity to ensure appropriate services and financial supports are made available to children transitioning out of hazardous labor.

## Private Sector

Private sector interventions in child labor prevention and child worker protections should reflect the regionally specific needs of the children and households these agencies serve, capitalizing in rapport and trust developed through community-based relationships. Private industry solutions to child labor will differ depending on the labor sector, the size of the

organization, the complexity of the supply chain, and many more nuances. These recommendations may need to be tailored to each organization's unique needs and represent efforts to reduce child labor that have shown impact in various global settings. To this end, considerations include:

**To reduce child poverty:**

1. **Support local non-profits in communities where companies have a significant presence.** The U.S. social services system is a mix of public and private organizations. Poverty reductions programs, programs for foster and run-away youth, child truancy programs, and various other programs that can reduce the risk of child labor are often private organizations. In communities where corporations have a significant presence, providing resources and grants to local children's social service programs can support children before they consider hazardous employment, and reduce the number of youths seeking to engage in child labor.

**To educate on child labor:**

2. **Support child labor trainings for professionals who work with children.** Training professionals who work with children to spot and respond to child labor can help transition children out of hazardous work and into safe forms of youth employment. Professionals such as pediatricians, emergency room doctors and nurses, child protective services workers, social workers and school staff work closely with children daily. Yet many do not have any training on child labor. Equipping these professionals with the knowledge to spot and respond to child labor, including information on the Department of Labor's Child Labor Hotline, provides the community with a team of first responders to transition children out of child labor while protecting them from poverty.
3. **Develop child labor detection and prevention workforce training.** Human resource organizations can develop core curricula focused on detecting and reporting child labor violations to supplement and localize federal efforts. These trainings can encourage the use of a child-centered approach to understanding the causes and consequences of child labor as outlined in this report.<sup>74</sup> Including a process for employees to anonymously report child labor to organizational leadership should be integrated into organizational trainings and resources.

**To prevent and address the harms of labor:**

4. **Adopt best practices in child labor regulation as outlined in the UNICEF USA Child Labor Compliance Framework and Resource Repository.** Informed by research and in consultation with industry leaders, UNICEF USA has developed a repository of best

practices in preventing and addressing child labor in the U.S. This Repository combines compliance with the United Nations Convention on the Rights on the Child alongside compliance with U.S. child labor regulations. In response to the unique needs of the U.S. context, the Child Labor Compliance Framework and Resource Repository focuses in on child labor within the U.S. supply chain, however, many best practices outlined in the Repository would be appropriate across many sectors of the workforce in high-income countries.

5. **Strengthen the system for contractors and subcontractors to verify the age of employees.** Many sectors of the workforce must rely on contractors and subcontractors to complete work. When contracting work, parent companies may not verify the ages of the employees of a contracted or subcontracted company. All employees should complete a Federal I-9 form upon hiring which verifies their age and eligibility to work. When contracting hazardous work, parent companies should establish a system to verify the I-9's of employees of staff with the contractor or subcontractor.
6. **Partner with schools in communities where organizations have a large presence.** Truancy, or skipping school, is often the first “red flag” for child labor. When organizations and corporations develop a significant presence in a community, engaging with the local school district can help to prevent child labor violations for the organization while also protecting children. As an essential part of community partnerships, organizations should ensure schools have information on the Department of Labor’s Child Labor Hotline and/or a process to anonymously report child labor directly to organizations’ leadership through an online portal or hotline. Additionally, school partnerships offer the opportunity for employers to provide workforce training to students. Partnerships with schools can provide the opportunity to create a pathway for students to access safer forms of work through workforce trainings, paid internships, and alternative schooling models that provide on-the-job training and apprenticeship opportunities. Workforce training programs can also provide a pathway for private industry to gather the views and perspectives of youth seeking employment. Recognizing the children have agency and are major stakeholders in a community, feedback from youth can provide corporations with a large presence with valuable insight into the future workforce of the community. Lastly, similar to government support for child labor education in schools, corporations can also support child labor law education programs in schools to help reduce the number of children seeking hazardous employment. Many children know very little about employment law in the U.S., particularly migrant children. Providing children with knowledge about their rights and the risks of engaging in hazardous work in the U.S. can reduce the number of children engaging in hazardous work<sup>75</sup>.
7. **Establish partnerships with legal service organizations.** Legal service organizations and legal representatives can work to not only garner protection for children in cases of labor

violations but can identify and mitigate risks for child labor and aid children in locating essential services that bolster their safety and well-being.<sup>76</sup> In some cases, children may also need support from a legal professional in the immigration process. Through partnerships with legal services organizations, companies can establish protocols to assist children that are found working within the supply chain.

## CONCLUSION

**E**ven with regulations on child labor set out in the Fair Labor Standards Act, child labor in the supply chain is on the rise in the U.S. today, with a surge in child labor violations over the last decade. At the same time, a growing number of states have coordinated efforts to reduce child labor protections. This report examines the material, financial, emotional, physical and developmental costs of child labor. While child laborers face acute risk in the present, the impact of their work at young ages is chronic and long-lasting with important implications for future educational attainment and occupational mobility in the future. Historical factors like labor deregulation and the degradation of work, workplaces and wages have long incited children's work in hazardous occupations and under oppressive conditions have been exacerbated by contemporary crises, like the Great Recession and COVID-19.

A vast number of children in the U.S. are employed, but not all working children are subjected to child labor. That is, distinct groups of children, particularly poor and low-income children, foreign-born children, and children separated from one or both parents and other adult caregivers, are at heightened risk of deep poverty and, therefore, child labor exploitation.

Despite the risks and challenges at hand, there are multi-level solutions across the government and private sectors. To mitigate rates of child labor in the U.S. supply chain effectively, U.S. policymakers must ensure that efforts to respond to and mitigate child labor take on a child-centered approach. A comprehensive solution will also include developing future research in this area. More recent, industry and sector-specific data is needed to respond more effectively to the growing child labor crisis. Additional research should focus on understanding which hazardous jobs children are doing, how many are involved, and which groups are affected. This will help address risks and strengthen the resilience for children, families, and communities to support child well-being.

# APPENDIX

TABLE 1

## Non-Hazardous Occupations Children 14 and Older May Legally Perform in the U.S.

The jobs 14- and 15-year-old workers may legally perform are limited to:	
1.	Office and clerical work
2.	Work of an intellectual or artistically creative nature
3.	Bagging and carrying out customer's orders
4.	Cashiering, selling, modeling, art work, advertising, window trimming, or comparative shopping
5.	Pricing and tagging goods, assembling orders, packing, or shelving
6.	Clean-up work and grounds maintenance — the young worker may use vacuums and floor waxers, but he or she may not use power-driven mowers, cutters, and trimmers
7.	Work as a lifeguard at a traditional swimming pool or water amusement park if at least 15 years of age and properly certified
8.	Kitchen and other work in preparing and serving food and drinks, but only limited cooking duties and no baking
9.	Cleaning fruits and vegetables
10.	Cooking with gas or electric grills that do not involve cooking over an open flame and with deep fat fryers that are equipped with and utilize devices that automatically lower and raise the baskets in and out of the hot grease or oil
11.	Clean cooking equipment, including the filtering, transporting and dispensing of oil and grease, but only when the surfaces of the equipment and liquids do not exceed 100° F
12.	Pumping gas, cleaning and hand washing and polishing of cars and trucks (but the young worker may not repair cars, use garage lifting rack, or work in pits)
13.	Wrapping, weighing, pricing, stocking any goods as long as he or she does not work where meat is being prepared and does not work in freezers or meat coolers
14.	Delivery work by foot, bicycle, or public transportation
15.	Riding in the passenger compartment of a motor vehicle except when a significant reason for the minor being a passenger in the vehicle is for the purpose of performing work in connection with the transporting — or assisting in the transporting of — other persons or property
16.	Loading and unloading onto and from motor vehicles, the hand tools and personal equipment the youth will use on the job site

Source: U.S. Department of Labor, "Fair Labor Standards Act Advisor," [webapps.dol.gov/elaws/whd/flsa/docs/haznonag.asp](http://webapps.dol.gov/elaws/whd/flsa/docs/haznonag.asp)



TABLE 2

## Hazardous Occupations Children Under 18 May *Not* Legally Perform in the U.S.

Child labor rules in U.S. prohibit work in, or with the following:
HO 1. Manufacturing and storing of explosives
HO 2. Driving a motor vehicle and being an outside helper on a motor vehicle
HO 3. Coal mining
HO 4. Forest fire fighting and fire prevention, timber tract management, forestry services, logging, and saw mill occupations
HO 5. Power-driven woodworking machines
HO 6. Exposure to radioactive substances
HO 7. Power-driven hoisting apparatus
HO 8. Power-driven metal-forming, punching, and shearing machines
HO 9. Mining, other than coal mining
HO 10. Meat and poultry packing or processing (including the use of power-driven meat slicing machines)
HO 11. Power-driven bakery machines
HO 12. Balers, compactors, and paper-products machines
HO 13. Manufacturing brick, tile, and related products
HO 14. Power-driven circular saws, band saws, guillotine shears, chain saws, reciprocating saws, wood chippers, and abrasive cutting discs
HO 15. Wrecking, demolition, and shipbreaking operations
HO 16. Roofing operations and all work on or about a roof
HO 17. Excavation operations

Source: U.S. Department of Labor, "Fair Labor Standards Act Advisor," [webapps.dol.gov/elaws/whd/flsa/docs/haznonag.asp](http://webapps.dol.gov/elaws/whd/flsa/docs/haznonag.asp)

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**To learn more, contact:**

Anne Day Leong, PhD, MSW  
Senior Director of Research, Evaluation and Research Partnerships  
[aleong@unicefusa.org](mailto:aleong@unicefusa.org)



for every child

125 Maiden Lane, New York, NY 10038  
[unicefusa.org](https://www.unicefusa.org)