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A labour-free childhood?
African perspectives on international child rights policies.

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"This story of children's rights, it must be good in Europe, no? Because here, we have to look for money..."
(Haoua, 14 years old; Jacquemin 2006, p398)

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ABSTRACT

This paper notes that one prominent trait of Western thinking about children is that childhood should be protected and care-free. For example, if children are engaged in work, their childhood is seen as 'lost'. Therefore, children's activities have been restricted to the spaces of family and formal schooling, which is believed to be the most appropriate route for a harmonious development towards adulthood. The introduction and background of the paper establishes that this Western trajectory for childhood is regarded as a neutral, global norm for a 'good childhood' in the international child welfare discourse, one that non-Western societies are expected to embrace and realise for their children as well; for instance, by ratifying and implementing policies on child labour that promote a labour-free childhood.

The paper focuses on sub-Saharan Africa, the region that has the highest prevalence of child labour in the world. A systematic search for academic research on policy implementation in this region is conducted. Twelve selected articles are reviewed using the analytical instrument of Ideal Types, answering the three research questions:

RQ1: How do the authors depict the child labour phenomenon in sub-Saharan Africa?
RQ2: According to the authors, are international policy instruments relevant for understanding and addressing the child labour issue in sub-Saharan Africa?
RQ3: Is a labour-free childhood a universally valid ideal and the appropriate way to ensure 'good childhoods' for children in sub-Saharan Africa?

The findings show that the central essence of the child labour policies - that children should be redirected from work to school, under the auspices of the nation state - is not a straight-forward undertaking in Africa. The analysis suggests that the current policies have some considerable flaws: since African livelihood strategies, Africa's position in the global economy, and its political history, and sociocultural context overall, differs greatly from the West, Western-based policies are unable to address some problematic forms of child labour and even risk to create new hardships for children struggling for a decent living in the sub-Saharan region. The paper puts particular emphasis on the cultural validity of the child labour 'abolition agenda', because it is shown that, in traditional African conceptualisations, work during childhood has positive connotations. Therefore, the paper considers the possibility of a childhood that includes work, but still qualifies as 'good'.

The paper's concluding argument is that in order for international policies to be truly universal and valid in all sociocultural contexts of the world, they need some revisions, and that the global childhood discourse may benefit from a wider understanding of childhoods, for example by including African wisdoms and knowledge about children into the discourse.

Keywords:
childhood, child labour, child rights, policy, literature review, ideal type, postcolonialism, Africa

PREAMBLE

This paper concludes my program for a master's degree in Children and Youth Studies at University of Gothenburg. I am deeply grateful for the opportunity to spend this time dedicated to in-depth studies of the subjects that I am most passionate about.

For me, it has not only been an inspiring academic undertaking, but also very rewarding on a personal level. My own childhood is not shared by many others: because of my parents' work, ten of my childhood years were spent in Tanzania. At a very young age, I realised that being a Swedish girl and being a Tanzanian girl are two entirely different things - and even though I lived in Tanzania, I did not experience a Tanzanian childhood. Instead, those years in my life represent a very niched experience of being a Swedish girl in a Tanzanian context. I qualify for the term *Third Culture Kid,* which means that I have a mixed cultural identity and a sense of belonging relating both to Swedish and Tanzanian contexts (see Moore & Barker, 2012; Colomer, 2017).

Since my late teenage years, I have been staying in Sweden. I soon found myself struggling to find my place as an adult dealing with children, both in my role as a teacher, and as a mother, because my thinking and understanding of childhood was somehow always a little bit different to everyone else's. It is clear to me now, that my conceptualisation of childhood is not *monocultural* (Moore & Barker, 2012). Because of my intercultural experiences, my thinking about children is a blend of both Swedish and Tanzanian discourses. I do not believe that there is one, singular, childhood: in fact, I know from personal experience that childhoods really only can be talked about in the plural form. Furthermore, due to my first-hand experiences of two extremely contrasting sociocultural contexts, it is a natural choice for me to approach the study of childhood with a specific focus on the significance of culture and power relations.

I suppose that, as I am writing this paper, I am thinking about the younger version of myself: the eight-year-old girl with pale skin and straight, brown hair who knew, so tangibly, that her friends' futures would be very different from her own, and she could not understand why. Now, I have found some more pieces of the puzzle and the image is beginning to make sense, although I do not want to accept the way that it is looking. What I see, is that the cultural values and identities of my African kin are systematically marginalised, ignored and even condemned under the prevailing global system of power relations and Western cultural hegemony. Perhaps this paper can contribute to a shift in the Western-dominated childhood discourse and help to recognise that other kinds of childhoods are valid too.

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And lastly, my children. Out of all the children in the world, you truly are the best.

A notation on the language:
Some Swedish literature is used in this paper. Phrases and quotations are given an English translation as follows: "Orginaltext på svenska [this author's English translation]".

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BACKGROUND

The purpose of this paper is to explore notions on what a 'good childhood' means (see Smith, 2015), or more precisely, interpretations of the 'best interest of the child' principle in the United Nations Convention on the Rights of the Child (henceforth, UNCRC; UNICEF, 1989), focusing on the issue of child labour. The paper will review the responsibilities that contemporary childhood discourses lay upon adults to arrange protected, care-free childhoods. It will include a critical analysis of assumptions about children's needs, as well as ideals and ambitions about what a child is and should become. Employing a postcolonial perspective, a literature review of academic research is performed to identify and discuss discrepancies in the ideological content of international child labour policy documents, and their practical implementation in the region that has the highest prevalence of child labour in the world, sub-Saharan Africa.

In this initial section of the paper, the reader is introduced to childhood constructs, the emergence of international child rights policies, and the perception of child labour in Western discourse. It is concluded with the aim and research questions and a brief layout of the paper.

Approaches for understanding childhood and the child

Western conceptualisations of childhood

Wall (2010) provides a historical background to Western[1] conceptualisations of childhood and identifies three 'models of childhood' - different ways of thinking about the nature of the child or "the way childhood has been interpreted" (p13). He provides examples of the *top-down* story which pictures the child as "essentially unruly" and in need of "careful disciplining" (p15); the *bottom-up* story on the other hand imagines the child as pure and innocent in its essence (p20); while the third is horizontal or *developmental* (Wall 2010, p25), meaning that a child's capabilities are progressively enhanced with time provided that adequate circumstances are in place. According to Wyn (2015), the developmental approach has had a significant impact on contemporary childhood discourse, research and policy (p12). She describes how it imagines childhood as a series of stages that need to be completed in order for the child to achieve adult maturity. In this thinking, one important task for adults is to ensure that the progression happens in the correct way, and to employ interventions if a child deviates from the appropriate path. The *sociocultural approach*, on the other hand, acknowledges that "different experiences of childhood and youth are made possible" (Wyn 2015, p12).

Scholars within the sociocultural tradition often refer to the well-known work of Aries (1962). James, Jenks & Prout (1998) argue that the strength of Aries' theory is that the concept of childhood is not reduced to a 'naturalistic' understanding of the child; however, they also note the risk of 'presentism', "that is, in the way that it appears to lock childhood into the realm of modernity" (1998, p4). Therefore, it may be appropriate to employ a *critical* view on contemporary childhood discourse as suggested by *postcolonial theorists* (see below), that points towards a recognition of childhood as "historically, politically, and socially constructed and that understandings of childhood are multiple, shifting, contingent, and contextual" (Smith 2015, p25).

The choice to take a sociocultural approach and to focus on the sub-Saharan region was, to some part, personal to the author (see *Preamble*), but it is also strongly supported academically.

[1] Wall defines 'the West' as cultures originated in the Mediterranean /European regions (2010, p14). In the literature, several concepts are used to differentiate between parts of the world that are either 'developed' or 'developing'; 'poor' or 'rich' etcetera. In this paper, the terms 'West' and 'Western', as per Wall's definition, will be preferred while terms like 'Global North /South'; 'First /Third world' etcetera may occur in quotations. For a comment on this terminology, see Canella & Viruru (2004), Chapter 1: in particular the paragraph *First, Second, Third and Fourth Worlds*, pp19-20.

It has been argued that Western knowledge and perspectives on childhood are dominating both policy and the academic field while other perspectives are unrecognised and disregarded:

> European and North American urban, middle-class concepts of children and childhood have been promoted worldwide as a standardized universal model of childhood [...] applicable also to societies of developing countries whose economic conditions, social structures, and cultural and religious traditions are vastly different [...] [These notions] are ethnocentrically projected globally as a criterion by which to judge how well all the other world's societies tend to their own children (Myers 2001, p41).

The unfortunate outcome of Western cultural dominance is that non-Western childhoods risk to be judged as underdeveloped, deficit, or *less-than-good*, because the global discourse is lacking an in-depth understanding of the needs of children and the meaning of childhood in contexts other than the Western (see also James, Jenks & Prout, 1998; Cannella & Viruru, 2004; Smith, 2015). A central ambition of this paper is, therefore, to pay attention to global power relations where Western cultural hegemony unfairly condemns non-Western childhood practices that may have positive and legitimate sociocultural value in their local context.

Non-Western sociocultural contexts and postcolonial critique

Here, the reader will be briefly introduced to one example on how Western childhood norms and standards may be unfitting to the African context, by looking at the text "Education for Self-Reliance", written by the Tanzanian *mwalimu*[2] Julius Kambarage Nyerere (1968), who was very influential on politics in sub-Saharan Africa in the early years of decolonisation (see Mmari & Colin, 1995).

For Nyerere, the purpose of education was "to transmit from one generation to the next the accumulated wisdom and knowledge of the society, and to prepare the young people for their future membership in the society and their active participation in its maintenance or development" (1968, p415). In an analysis of Nyerere's text, Wabike (2015) writes:

> Education for Self Reliance (ESR) reform and philosophy authored by Mwalimu J. K Nyerere gave a thorough critique of the education system inherited from the colonial state by showing that it was elitist (for the few), theoretical and bookish (not integrated with production) and alienating (divorcing the recipients of it from his/her African society in general) (Wabike 2015, p21).

Nyerere argued that educational systems in different contexts by necessity must be "very different in organization and in content (...) because the societies providing the education are different" (1968, p415). The problems with the inherited education system had to do with the fact that its curricular content was designed for the sociocultural context of Britain, and therefore it was not appropriate to educate Tanzanian children with skills, knowledge and values that would be useful for them in the future that awaited them. Furthermore, the educational system installed by the British in Tanzania "was not designed to prepare young people for the service of their own country; instead, it was motivated by a desire to inculcate the values of the colonial state" (p416) and, Nyerere claimed, "it was a deliberate attempt to change [indigenous African] values and to replace traditional knowledge with the knowledge from a different society" (p417). Therefore, the British education was "both inadequate and inappropriate" (p417) for the new Tanzanian state. This had to be corrected: Tanzanians needed an education that suited their own culture and the actual need of competences within the local economy. In Nyerere's opinion, *formal* education had limited relevance for Tanzanian citizens. In his visualisation of a context-appropriate education system, which would include basic formal skills such as literacy, mathematics, history etcetera, he also promoted traditional *informal*

[2] Swahili: meaning teacher.

education, learning-by-doing. Children's active participation in livelihood activities, such as agriculture, should be integrated into the day-to-day school routines (Nyerere, 1968).

This example shows that simply stating that children have a right to education is not enough: the education in question must be carefully designed to fit local circumstances so that it equips the child with knowledge and skills that are appropriate and useful for her/him in the society in which s/he lives. Unfortunately, the establishing of a functioning educational system in Tanzania has, despite Nyerere's early insights, not been straightforward[3] and, as this paper will show, the same struggle to provide basic child rights is shared with many nation states in sub-Saharan Africa today.

Nyerere's point about the imposition of cultural values of the coloniser on to the colonised stresses that departing from Western ideas as a 'neutral norm' is problematic not only because of the vastly different economic conditions of the diverse societies in the world, but also the heritage of colonisation. Therefore, to fully understand present-day global imbalances regarding successful implementation of 'good childhoods', this author insist that it is necessary to acknowledge that the *North/ South* (or developed/ developing, rich/ poor etcetera) divide of the world aligns with the *former colonising/ colonised* divide. For the researcher that wishes to scrutinise and challenge Western cultural conceptualisations of childhood, *postcolonial critique* may be a helpful theoretical entry point:

> Postcolonial critique requires that adults place themselves in positions in which they must examine authority, power, knowledge, and even the will to understand. *Adults must be willing to rethink and reconceptualize what they think they know about the child and childhood* (Cannella & Viruru 2004, p63: my emphasis).

One of the ambitions of this paper is to try to take on Canella & Viruru's challenge to *rethink* dominating childhood discourses, in the hope to contribute to a better understanding of the global diversity of childhoods.

Smith (2015) points out that "the child and childhood cannot be defined or predicted" (p26). Considering then, that different sociocultural contexts set different requirements for what specific support a child needs to successfully develop into adulthood, an obvious challenge will occur when people from diverse contexts try to agree on how universal rights for children should be formulated and realised.

Western roots for international 'childhood standards'

Cregan & Cuthbert (2014) review how the care of children, which traditionally had been the responsibility of the family, was taken over by the state during the European industrialisation (see Chapter 3, *Global childhoods: Children as objects of national and global concern,* p35-53). Politicians and professionals were concerned about the situation of poor children in the growing cities, and social institutions took initiatives to provide for their needs when their parents were deemed incapable of doing so themselves. Children's participation in public spaces and work was consistently limited; instead, their place in society was constricted to specific, 'child-appropriate' spaces such as playgrounds, homes and schools (p90). The child discourse that emerged during this time was characterised by *professionalisation* - scholars within academic fields such as medicine, psychology and pedagogy were the ones who knew best how to deal with children's needs (p45). In the 1900's, Western childhood was increasingly *institutionalised:* "As the century progressed it was no longer sufficient to rely on common sense or past practice in dealing with children. Governments, courts and parents came to rely on child experts and professionals in childhood matters" (Cregan & Cuthbert 2014, p36).

[3] For further details on the challenges and dire state of Tanzanian education during recent years, see Wabike's comprehensive article, "Educating a nation towards self-reliance: Tanzania's journey in search for an education that is meaningful to its people" (2015).

While childhood was established as a concern for the nation state, social issues (such as labour rights, feminism, and the anti-slavery movements) were increasingly discussed *internationally* as "a growing sense of membership of a world community" (p38) emerged, and this also included the issue of child welfare. The 'internationalist approach' became especially clear during the World Wars in the first half of the 1900's. The organisations *Save the Children Fund* and *United Nations Children Emergency Fund* (UNICEF) were both founded with the intention and purpose to assist children who were citizens of former enemy states.

> Save the Children Fund embodied an internationalist approach to the welfare of children and is an early sign of the emergence of the concept of *the world's child* - to whom all nations, irrespective of politics and other considerations, owe obligations of care and protection (Cregan & Cuthbert 2014, p39: my emphasis).

After the crisis following the conflicts in Europe was over, UNICEF continued its work with a new focus on the countries in former colonies, that gained independency during the 1950's and 60's (Cregan & Cuthbert 2014, p44). The notion of 'the world's child' was thus expanded and the international campaign for children's welfare was taken to a global scale.

The UNCRC is one of the most important and influential documents in the international child welfare community's pursuit to guarantee a 'good childhood' for every child, regardless of national belonging. Under the headline *How was it decided what should go into the Convention on the Rights of the Child?,* UNICEF answers:

> The standards in the Convention on the Rights of the Child were negotiated by governments, non-governmental organizations, human rights advocates, lawyers, health specialists, social workers, educators, child development experts and religious leaders from all over the world, over a 10-year period. *The result is a consensus document* that takes into account the importance of tradition and cultural values for the protection and harmonious development of the child. It reflects the principal legal systems of the world and acknowledges the specific needs of developing countries (UNICEF 2021a; my emphasis).

Despite its Western sociocultural roots (Myers 2001, p48), it is clear by the UNICEF quotation above that the UNCRC is meant to establish a global, culturally universal norm, or standard, for children's rights and a 'good childhood', such as it has been defined by child experts. Indeed, all nations of the world (except the United States of America[4]) have at the time of the writing of this paper ratified the UNCRC (UNICEF 2021a) and thus obliged themselves to realise its vision about childhood, including its view on how to manage the issue of child labour.

Child protection and child labour

> Childhood is the time for children to be in school and at play, to grow strong and confident with the love and encouragement of their family and an extended community of caring adults. It is a precious time in which children should live free from fear, safe from violence and protected from abuse and exploitation. As such, childhood means much more than just the space between birth and the attainment of adulthood. It refers to the state and condition of a child's life, to the quality of those years (*Childhood defined,* UNICEF 2021b).

What does work or labour mean when it happens during childhood? In UNICEF's definition of childhood above, labour is not mentioned. Instead, a 'precious' time of life is visualised where caring adults ensure a care-free, safe and protected childhood. This aligns with a *protectionist* interpretation of the UNCRC (see Peleg, 2018). Peleg describes how the UNCRC envisions a childhood where "children should enjoy a happy and carefree time", a sentiment that "is linked

[4] USA has signed but not yet ratified the UNCRC: "By signing the Convention, the United States has signalled its intention to ratify, but has yet to do so" (UNICEF 2021a).

to the idealised absence of children from the public space - especially the workplace and the political domain" (2018, p328).

The conception of labour being inappropriate during childhood is clearly illustrated by the *Global Childhood Report* by Save the Children (2021). In the report, Save the Children uses the *end of childhood index* to show to what extent children in each country of the world risk 'missing out on childhood' due to exposure of a 'childhood ender'; labour being one of them. Thus, according to Save the Children, labour is so incompatible with childhood that it in fact ends it. Assuring that children are excluded from labour is, in this view, crucial for childhood to happen at all. However, despite the efforts that have been made to eliminate child labour during the last century, children are still engaged in work in many parts of the world. In their *Complete end of childhood index 2021*, Save the Children lists the percentage of children in the ages 5-17 that are working in the column titled *Child begins work life* (Save the children 2021, p4-7). Amongst those countries that have a 'high' or 'very high' prevalence of child labour, 9 out of 10 are in Africa; when looking at "global and regional averages" (p7), it is clear that sub-Saharan Africa stands out as the only region where the average prevalence of child labour is 'high', around 30 percent. In the language of the dominant discourse of a 'protected and care-free' childhood, this should mean that only 70 percent of African children are experiencing a proper, labour-free childhood. A specific focus on the sub-Saharan region is therefore particularly interesting in an investigation of the child labour issue.

Child labour policy: a litmus paper for notions on 'good childhood'

In this background, it has been established that a good childhood, according to contemporary discourse, should be labour-free. A brief review has been given of the development of the most important international child rights policy document, the UNCRC. Although it is originated in the sociocultural sphere of the West, the UNCRC is written with an ambition to be culturally universal. In the international child welfare community, it is assumed that the childhood envisioned in the UNCRC, including the absence of labour, should be appropriate for arranging a good childhood for all children, regardless of their sociocultural context. However, despite the almost-universal ratification, children are still engaged in work and the sub-Saharan region has the highest prevalence of working children in the world.

This contrasting discrepancy between ideal and reality is an urgent subject for an academic study. Child labour has been defined as something that is incompatible with a 'good childhood': meanwhile, the region where this condemned practice is most prevalent is constituted by former colonised countries. Looking critically at contemporary childhood discourse, and employing a postcolonial approach, might be a way to reach new insights and to identify underlying ideologies and assumptions that may not be culturally universal. For this purpose, *policy documents* such as the UNCRC are potent materials for analysis:

> Policy has an undeniable cultural dimension. It takes shape within specific historical and national or international contexts. In this sense it is appropriate to think about policy in anthropological terms, as a cultural product [...] any policy proposal we put forward may well reflect deep-seated cultural assumptions (Bacchi 2009, ix-x).

Departing from Bacchi's argument, it is a plausible assumption that some aspects of policies and childhood 'standards' that are originated in the Western sociocultural context may not be culturally valid in non-Western parts of the world, such as sub-Saharan Africa.

Aim and research questions

Noting that international child rights policies embody Western ideals about childhood, this paper asks: To what extent are these documents universal and appropriate for arranging 'good childhoods' for children in the many diverse sociocultural contexts of the world? A systematic literature review of academic papers on child labour policy implementation in sub-Saharan Africa, and an analysis of ideological content, will be performed, aiming to answer the following research questions:

RQ1: How do the authors depict the child labour phenomenon in sub-Saharan Africa?
RQ2: According to the authors, are international policy instruments relevant for understanding and addressing the child labour issue in sub-Saharan Africa?
RQ3: Is a labour-free childhood a universally valid ideal and the appropriate way to ensure 'good childhoods' for children in sub-Saharan Africa?

Disposition

The following section, *International policy on child labour*, reviews three important child labour documents and describes some traits of the labour-free childhood that they envision and that may be at odds with non-Western notions of childhood. Next, in *Theoretical framework for analysis,* the analytical instrument of Ideal Types is laid out. The section *Method for literature review* describes how the data for the study is selected through a systematic search for academic articles and the narrative approach for analysis. In *Findings*, the assessments of the articles on how these policies are received in local African contexts is collected. The paper is concluded with a *Discussion* on the cultural validity of the labour-free childhood model, comments on how child labour policies may be adjusted to be more appropriate in the sub-Saharan context, reflections on the methodology of the study, and suggestions for further research.

INTERNATIONAL POLICY ON CHILD LABOUR

The ILO138, ILO182 and the UNCRC

This paper focuses on the three most important international policy documents (Myers 2001, p44) that address the issue of child labour: the *Minimum age convention* and *The Worst Forms of Child Labour Convention* by the International Labour Organisation (ILO), and Article 32 of the UNCRC. This section will take a closer look at how these three texts conceptualise children's work and the working child, why labour is viewed to be detrimental to children, and how it should be eliminated.

The International Labour Organisation conventions: ILO138 and ILO182

The ILO was founded in 1919 as a tripart organisation of governments, employers, and workers (International Labour Organization, 2021a). After the founding of the United Nations, ILO was absorbed to be a specialised agency under it in 1946. Today, the organisation has 187 member states (International Labour Organisation, 2021b). In the online presentation *About the ILO*, the organisation claims to work "to set labour standards, develop policies and devise programmes promoting decent work for all *women and men*" (International Labour Organization 2020a; my emphasis). Although this choice of words may imply that work is a matter for *adults* only, ILO has from its very start been addressing the conditions of working children, mainly by setting minimum ages for specific types of work. For example, conventions regarding the minimum age in industry (number 5), night work for young persons (6), working at sea (7), agriculture (10) and trimmers and stokers (15) were all adopted within the first three years after the founding of the organisation (International Labour Organization, 2021c). At the time of the writing of this paper, the *Minimum Age Convention* is ratified by 173 member states - the only two African countries that have not ratified it are Liberia and Somalia. The *Worst Forms of Child Labour Convention* is ratified by all member states (International Labour Organization 2021c).

The Minimum Age Convention: ILO138[5]

In the ILO138 (International Labour Organization 1973), member states are obliged to set a minimum age for admission to employment: "no one under that age shall be admitted to employment or work in any occupation" (article 2:1) except for 'light work' performed within family settings. According to article 2:3, "The minimum age [...] shall not be less than the age of compulsory schooling and, in any case, shall not be less than 15 years." Children may be employed to do 'light work' from the age of 13, provided that it "is not likely to be harmful to their health or development and not such as to prejudice their attendance at school" (article 7). States that have insufficient economic development and education facilities may lower the indicated minimum ages by one year. Work that is considered to "jeopardize the health, safety or morals of young persons", however, should not be undertaken by anyone under the age of 18 (article 3). Articles 4 and 5 allow for member states to limit the scope of application of the convention. In such cases, the states shall specify what areas of work that they will prioritise. 5:3 indicates what kind of work which, as a minimum, must be included, such as construction or transport, as well as "plantations and other agricultural undertakings mainly producing for commercial purposes, but excluding family and small-scale holdings producing for local consumption", meaning that farming within a family context is allowed.

[5] For a comprehensive commentary on the ILO138, see Myers (2001), pp45-48.

The Worst Forms of Child Labour Convention: ILO182[6]

The ILO182 (International Labour Organization 1999) targets some forms of labour that are of main priority for international action, stressing that the ILO138 remains a fundamental policy instrument. In its Preamble, it is stated that "child labour is to a great extent caused by poverty, and that the long-term solution lies in sustained economic growth leading to social progress, in particular poverty alleviation and universal education".

Article 2 states that "the term child shall apply to all persons under the age of 18". Article 3 defines the *Worst Forms* in four categories: slavery, prostitution, illicit activities and "work which, by its nature or the circumstances in which it is carried out, is likely to harm the health, safety or morals of children" (article 3:D). The work referred to under 3:D "shall be determined by national laws or regulations [...] taking into consideration relevant international standards" (article 4:1).

In article 7:2, member states are obliged to "take effective and time-bound measures" to implement programmes for elimination of the Worst Forms to:

> a) prevent the engagement of children in the worst forms of child labour;
> b) provide the necessary and appropriate direct assistance for the removal of children from the worst forms of child labour and for their rehabilitation and social integration;
> c) ensure access to free basic education, and, wherever possible and appropriate, vocational training, for all children removed from the worst forms of child labour;
> d) identify and reach out to children at special risk: and
> e) take account of the special situation of girls.
> (International Labour Organization, 1999)

In point (e), girls are stated to need special attention. In the writing of ILO182 it is not specified why or in what way girls' situation is 'special': however, literature suggests that it implies domestic work (see for example Peleg 2018, p335).

The UNCRC: Article 32

In the UNCRC, child labour is addressed in article 32[7]:

> 1. States Parties recognize the right of the child to be protected from economic exploitation and from performing any work that is likely to be hazardous or to interfere with the child's education, or to be harmful to the child's health or physical, mental, spiritual, moral or social development.
>
> 2. States Parties shall take legislative, administrative, social and educational measures to ensure the implementation of the present article. To this end, and having regard to the relevant provisions of other international instruments, States Parties shall in particular:
> (a) Provide for a minimum age or minimum ages for admission to employment;
> (b) Provide for appropriate regulation of the hours and conditions of employment;
> (c) Provide for appropriate penalties or other sanctions to ensure the effective enforcement of the present article.
>
> (UNICEF, 1989)

Looking at article 32 of the UNCRC, the language of the ILOs is recognisable; it also references 'other international instruments', implying that the ILO conventions are complementary to the UNCRC (Peleg 2018, p334). Signatories are requested to set a minimum age for employment; however, it does not provide a specific suggestion for this. By stressing children's right to *protection from exploitation* or harmful work, Myers (2001) argues that the UNCRC does not "exclude children from economic participation altogether"; instead, it is "targeting only work

[6] Myers (2001), pp51-52.
[7] Myers (2001), pp48-51.

that is *detrimental* to children" (2001, p48: my emphasis). Education has, as in the ILO conventions, a strong priority in the UNCRC as well.

Comments and criticisms on the child labour policies

Comparing the language of the two ILO conventions, some details will be pointed out that are of particular importance for the present paper. Firstly: in ILO138, the writing does not use the word 'child' other than for the term 'child labour': rather, it refers to 'young person' or 'person under the age of...', whereas in ILO182, it is defined in article 2 that the term 'child' applies to anyone under the age of 18[8]. Secondly, the notion of work that may harm children's 'health, safety or morals' is present in both ILO conventions and is in both cases deemed to be inappropriate under the age of 18. To an extent, the ILO182 is an elaboration of the 3rd and 5th article of ILO138. Thirdly: the ILO138 has not lost its position as a main policy instrument on child labour by the adoption of ILO182, they are rather complementary to each other. Lastly: Both conventions leave a fairly large room of manoeuvre for the signatory states to define in national legislation what specific kinds of work that are to be addressed.

The writing in the UNCRC largely aligns with the ILO conventions. However, the absence of a recommended minimum age leaves room for interpretations where work is possible for young children, as long as their employment is regulated to ensure protection from exploitation and hazards "in order to preclude the possibility that labour will undermine their development" (Peleg 2018, p334). Even so, contemporary discourse on child labour is dominated by an 'abolition agenda', which aims towards ending all forms of work in children's lives completely (Peleg 2018; White, 1999). Although it refers to 'other international instruments', which can be interpreted as a support for the guidelines provided by ILO, work during childhood is not entirely ruled out in the UNCRC. "The prohibition on child labour is therefore a result of a specific reading of the Convention" (Peleg 2018, p334), one that promotes a 'care-free' childhood.

An illuminating example on how children's economic activities are understood is how the two words *work* and *labour* are given different meaning in the discourse:

> According to this distinction between different forms of children's activities, performing light tasks, such as delivering newspapers while riding the bike in a leafy suburb, develops children's sense of responsibility, enables them to earn pocket money, and teaches them to handle their finances. Meanwhile, poor families that send their children to work in factories are seen to be harming the children, disrupting their childhood and compromising their future (Peleg 2018, p331).

This emotive distinction promotes Western children's economic activities and condemns the work that many non-Western children are engaging in for their survival. Furthermore, Peleg points out that the discussion often ignores what children themselves have to say about their work. For the individual child, both 'labour' and 'work' may serve the same purpose - to earn money. However:

> One child will engage in this activity because she needs to support herself or her family, and this will be considered as contradictory to the sort of childhood that she should have, while another child will use the money she earns to treat herself to something that she wants, and this will be considered an expression of autonomy by the universal happy child (Peleg 2018, p331).

As 'work' is potentially safe - or even beneficial - for a child while 'labour' (that is, by all accounts, activities that aim for necessary economic survival) is assumed to be harmful, it can be argued that one of the concerns regarding work during childhood is that it risks robbing

[8] A note of relevance is that the ILO182 was written after the UNCRC in which the child is defined in fixed terms as anyone under the age of 18; the change in terminology in ILO182 might be connected to the strong influence from the UNCRC at that time (Myers, 2001).

children of their *innocence*: when children take on real economic responsibilities, their childhood does not qualify as 'care-free'. This notion is consistently traced to Western childhood ideals in the literature. For example, Smith (2015) writes that Western conceptualisations of childhood "romanticizes the early years of a person's life as unproblematic, leisurely, and free of decision making, where adults protect children's innocence from the corrupt (adult) world" (p22) and warns that such limited understanding of childhood leads to marginalisation or 'othering' (p30-31). White (1999) argues that work, in contemporary international discourse, has become a 'pathology' when associated with childhood; "the legacy of this way of thinking is an unrealistic and essentially child-unfriendly model of childhood" (1999, p134) since it targets the wrong problems and stigmatises non-Western experiences of life and childhood.

Western-defined trajectories for childhood

In the review of child labour policies presented here, a strong message is communicated: that children should be enrolled in school and ideally not work - in the sense of taking on real economical responsibilities - at all. These notions are central for the present discussion because they establish that the only acceptable *habitus* (Cregan & Cuthbert 2014, Chapter 5) for children are school and family, which is an ideal that originates from the West /Global North:

> In the affluent Global North, child labour laws have existed since the nineteenth century and the lives of many children are now regulated solely to the (private) ordered and professionally managed places of home and school [...] These are physical environments in which - we imagine - children are cherished and cared for, nurtured and educated to reach their full potential (Cregan & Cuthbert 2014, p77).

This stance is problematic: first, home and school may in fact not be a safe place for children (p77), and when looking at contexts outside the West, both the concept of home, family and education may be different. Furthermore: "while it may be tempting to assume that the spaces of home, school and work are separate and discrete, this is not the case anywhere in the world" (Cregan & Cuthbert 2014, p78) - while work (for survival) is ruled out in the Western conceptualisation of an appropriate childhood, for many children in other parts of the world, it is an integrated part of life. Still, schooling is promoted in the dominant discourse as the only acceptable occupation for children: “Education has become implicated in global markets, with all countries aiming to increase educational participation” (Wyn 2015, p9), and the child labour policies reviewed here contribute to the school-advocating discourse by providing provisions for 'redirecting' children from work to school.

Wyn discusses the concept of *transition regimes*, which "refers to the institutional processes, practices and discourses of education and welfare systems" (2015, p9) that have been *naturalised* into our thinking about childhood. "Through its integration into policy framework, this approach has taken on the quality of orthodoxy - a taken-for-granted way of framing childhood and youth" (p14-15). The transition regime may explain the notion of *lost childhoods*: a childhood that does not follow the school-only trajectory does, plainly, not qualify as a proper childhood. Looking again at the *Global childhood report* (Save the Children, 2021), it is very clear that a childhood where labour is present is indeed not a childhood. In addition, the language of this document also pinpoints the global polarisation in the matter of 'good childhoods':

> Eight Western European countries rank in the top 10, attaining very high scores for children’s health, education and protection status [...] The 10 bottom-ranked countries – all from sub-Saharan Africa – are a reverse image of the top, performing poorly on most indicators. Children in these countries are the least likely *to fully experience childhood*, a time that should be dedicated to emotional, social and physical development, as well as play. In these and many other countries around the world,

> children are robbed of significant portions of their childhoods (Save the Children 2021, p1: my emphasis).

Here, the West represents the model example of countries who succeed in providing childhoods while countries in Africa are described as the diametrical opposite. The quotation above illuminates the core of the issue that this paper aims to discuss: that the labour-free agenda has a too limited understanding of what a 'good childhood' can be. The "notion of lost childhood continues to reinscribe the understanding of a singular childhood, that is, that there is only one 'right' way to have a 'good' childhood" (Smith 2015, p22-23), which, as this paper has established, is the kind of childhood that Western societies are providing for their children.

Moving forward, this paper joins the expanding research tradition that "seeks to disrupt [...] the contemporary discourses of childhood that privilege the Western minority world constructions of childhood" (Smith 2015, p25). The following sections will describe how the paper will attempt to identify 'pseudo-universal notions' (White 1999, p137) in the alleged socioculturally universal and globally applicable policies regulating children's involvement in work.

THEORETICAL FRAMEWORK FOR ANALYSIS

The previous section has taken a closer look at the international policy documents that are central to the present study and the labour-free childhood that they envision. Some criticism on the relevance of these policies in diverse sociocultural contexts have been detected which motivates a study of their universalism and validity for ensuring a 'good childhood' for children throughout the world. In the following section, a theoretical framework will be laid out for *qualitative analysis of ideas and ideological content* using research articles on policy implementation in sub-Saharan Africa.

Ideology analysis and ideological texts

The methodological framework for analysis is retrieved from the handbook in textual analysis *Textens mening och makt [The meaning and power of text]*, chapter 4 (Bergström & Svärd, 2018). The UNCRC and the two ILOs are here understood as ideological *texts* (p138), in the sense that they aim to give a comprehensive understanding of labour during childhood. For the purpose of the present paper, the ILO138, the ILO182 and Article 32 of the UNCRC will be regarded as one, cohesive entity. Together, they contain the three elements of ideological content: *descriptive statements* - concepts of what childhood and child labour is; *value-statements* - how childhood/ labour during childhood should be; and *prescriptive statements* - the logical action-oriented conclusions on how it should be managed (Lindgren 2017, p92).

Bergström & Svärd stress that the impact and meaning of an ideological text cannot be fully understood without a consideration of its context. The researcher must "röra sig utanför det källmaterial där ideerna uttrycks [move beyond the source material where the ideas are expressed]" (2018 p142). This is the purpose of the use of literature on policy implementation as the basis for the analysis: in the review of how the policies are received in the sub-Saharan context, these aspects may be revealed.

Further theoretical understanding of the concept of ideology is collected from Billig et al (1988) who make a distinction between *lived* (the way of life) and *intellectual* (theoretical system) ideology, and the processes where ideological content is translated between them (p29). Ideology is closely connected to thinking and social interaction, where people share values, norms, hopes etc. with each other. The point of interest for this study is the notion of ideology as *the collected thinking* of "an age or of a concrete historic-social group" (Mannheim 1960; cited in Billig et al 1988, p28). Billig et al state that "this conception comes close to equating the ideology of a society or epoch with its culture" (p28). Approaching ideology as something that is close to the concept of culture is highly useable for the present paper, as the purpose of the study is to examine the texts - the UNCRC and the ILOs - for their validity in diverse sociocultural contexts.

The migration of ideology between theoretical /scientific systems and the day-to-day thinking of people is of special interest as well:

> [...] notions can be observed to pass from formal ideological theories into lived ideology of ordinary life. It can be expected that this passage will transform the concepts [...] The passage need not be unidirectional, going from intellectual discourse to mass discourse. The reverse journey is also made (Billig et al 1988 p26).

In the present analysis, this implicates two things. Looking at the UNCRC and ILOs as a product of cultural discourse, it may have an impact on people's lived ideology, if it is accepted and integrated into their day-to-day thinking. In this case, if some elements of the labour-free childhood in the policies weren't present in people's thinking before, it may be adopted and become part of their *common sense* (1988, p26). Simultaneously, it will put the spotlight on the ideological system that lies behind the policies - the 'age' or 'concrete historic-social group' that

authored them. As shown in the background, the policies are dominated by Western notions on childhood, and in the reading of academic research on policy implementation in sub-Saharan Africa it can be expected that discrepancies will be found, if African notions of work during childhood are different from those in the West.

White (1999) discusses the tension of *universalism* versus *cultural relativism* in human rights conventions: "can one defend the principle of universality in international conventions and debates, while at the same time promoting openness, flexibility and sensitivity to different cultural contexts in the implementation of standards?" (White 1999, p135: edited quotation, references excluded). Billig et al point out that ideologies rarely are consistent systems where "thoughts, beliefs, values and so on fit together into the total mental structure" (1988, p29). They suggest a study of *dilemmas*, or *themes and counter-themes* in ideology: "To uncover the dilemmatic aspects of ideology, it is necessary to look for the contrary themes of lived ideology" (p31). By linking dilemmas to thought, Billig et al argue: "we do not look forward to the end of dilemmas, and towards a pure consistency of thinking, for that would be to look forward to the end of thought" - however: "present dilemmas might be replaced by others. In short, this means seeking to change opinions by changing what people might talk, argue and think about" (1988, p148).

The study of dilemmas suggested by Billig et al provides a suitable approach for assessing the level of universalism of child labour policy:

> All societies must possess their own dilemmatic themes, but this does not mean that present-day dilemmatic themes are universal. In fact, if the dilemmatic aspects of thinking are ideologically created and the produce of history, they can hardly be universal (Billig et al 1988, p149).

This paper will take on the issue of child labour as one of the things that discourse has determined to be a topic worth talking about. As child labour has qualified for discussion, it means that we acknowledge both its existence during childhood and, simultaneously, that its existence is problematic. The task that will be attempted in the present study is to analyse whether the theme or dilemma of child labour, such as it is presented in policy, is interpreted in the same way in the African sociocultural context, or if it may take another form.

Ideal Type

The analytical instrument chosen for the present study is the *Ideal Type*, described by Bergström & Svärd (2018 pp147-153). Coined by German sociologist Max Weber, the Ideal Type is a theoretical construction collecting prominent characteristics of a particular phenomenon. The researcher uses it as a reference point when analysing empirical material to examine to what extent the data aligns with the Ideal Type. It is not to be understood as an objectively correct description, nor as a statistical average:

> Det 'ideala' handlar snarare om en analytisk renodling av ett fenomen som skjuter vissa aspekter i förgrunden för att de är viktiga ur ett teoretiskt perspektiv [The 'ideal' is rather an analytical streamlining of a phenomenon that highlights some aspects because they are important from a theoretical perspective] (Bergström & Svärd 2018, p148).

In order to construct an analytical instrument for the present study, traits are drawn from all three policies (the UNCRC, ILO138 and ILO182) to lay out a rough sketch of their *descriptive statements*, *value-statements* and *prescriptive statements*. This ideal type is strictly based on content that can be derived from the text of the policies, which means that it is lacking practical instructions and some in-depth understanding: it is not designed to reach a definitive or evidence-based answer to a question, but rather to identify a diverse range of perspectives and understandings of the child labour phenomena.

Summizing the review of the policies presented above, *The Child Labour Ideal Type* for the present analysis is shown in Figure 1.

Figure 1.
The Child Labour Ideal Type.

Descriptive statements:

- Child labour is caused by poverty.
- Child labour is caused by inadequate education.
- Child labour is hazardous to the child's health.
- Child labour is detrimental to the child's development.
- Child labour is exploitative.
- Child labour interferes with school.
- Work within a family context is not likely to be harmful to the child.

Value statements:

- A child should not work before the age of 15, and only in safe occupations.
- Light work from the age of 13 is allowed if it does not interfere with school.
- Children younger than 13 may perform light work within a family context.
- From 18 years, childhood is completed, and all forms of work are acceptable.

Prescriptive statements:

- Child labour should be eliminated through alleviating poverty.
- Child labour should be eliminated through redirecting children from work to school.
- States should ensure a labour-free childhood by instituting and enforcing a minimum age for work that aligns with the completion of compulsory education.
- Compulsory education must be free and accessible.
- States should take preventive action as well as remove and rehabilitate children from harmful labour.

This Ideal Type will guide the analysis of the chosen literature on policy implementation in sub-Saharan Africa. The selection of research articles, and a more detailed account on how the analysis will be performed, is described in the next section.

METHOD FOR LITERATURE REVIEW

A literature review is a crucial first step in any research process to provide a background for an empirical investigation and "establish what is already known about the topic" (Bryman 2016, p90), but it can also be performed as a 'stand-alone' study in itself. In that case, the research questions are asked "till litteraturen istället för till personer [to the literature instead of persons]" (Eriksson Barajas, Forsberg & Wengström 2013, p70). For the present study, empirical data collection would be impractical, and a literature review is more appropriate.

A differentiation is made between *narrative* and *systematic* reviews. The systematic approach typically answers research questions like 'what works?' or 'does this work?'. It is often used in fields like medicine to determine evidence-based conclusions and instructions for practice (Bryman 2016, p98). In social sciences, narrative reviews are most common (p91) but the systematic approach is increasingly being used as well (for example in educational research: see Eriksson Barajas et al, 2013). The benefits of the systematic review, compared to the narrative, is claimed to be that it provides a wider, more comprehensive account of the existing literature on the topic investigated, and that the strict and transparent search methodology reduces the risk of researcher bias (Bryman 2016, p98). As the main objective of the present study is to examine ideology and cultural conceptions, an obvious risk for researcher bias exists. Therefore, a systematic review may be fitting: however, a complete systematic methodology is not realistic to achieve within the limitations of a master's thesis (see *Using systematic review in a student research project:* Bryman 2016, p102). In addition, the systematic approach has some limitations that may not allow the study's research questions to be properly addressed. A strict systematic review risks being "more concerned with the technical aspects of how the review is done than with the analytical interpretations generated by it" (Bryman 2016, p105), and an absence of "a thoughtful, interpretive critical reflection" (Greenhalgh, Thorne & Malterud 2018, p4) can degrade the academic quality of the study. This, on the other hand, is a strength of the narrative approach, where the author uses the included literature purposively to build an argument (Bryman 2016, p97).

Greenhalgh et al point out that the distinction between the two traditions is increasingly difficult, or even irrelevant, to make as 'hybrid' forms also occurs (2018, p3). Both the systematic and the narrative approach have advantages that are suitable to the purposes of the present study. Therefore, this paper will draw inspiration from the idea of a hybrid approach: it will borrow some techniques from the systematic methodology *only* for the selection of articles in order to avoid a biased choice of literature. After the selection is made, a *narrative review* of the articles will be performed.

Systematic selection of research articles

The systematic method uses "explicit procedures to arrive at a synthesis of a body of literature" (Bryman p91). It must be specified what kind of literature that is to be collected and "the search strategy must be described in terms that allow it to be replicated" (p99). This requires, for instance, a thorough report of keywords used for the search; which databases that are being used; inclusion criteria; relevance assessment of the search result; and quality assessment (see *Table 5.1,* Bryman 2016, p101).

The data required for the present study was academic research on child labour policy implementation in sub-Saharan Africa. In this section, an account of the systematic literature search process is presented.

Inclusion criteria

The selected articles needed to meet the following requirements:

1. They must be about children's work /labour.
2. They must relate to the sociocultural context of sub-Saharan Africa.
3. They must account for the views of children and/or local communities on children's work.
4. They should offer empirical data relating to RQ1[9] and RQ2[10].
5. They should provide suitable basis for discussion of RQ3[11].

To clarify, criteria number 1 and 2 restrict the scope to articles on child labour in the geographical region of sub-Saharan Africa; number 3 excludes articles that do not address local /African perspectives on the issue on child labour; number 4 prioritise original investigations but also allows overview articles that include relevant data on the research questions; and, although RQ3 will be answered through the analysis, in the case that the included articles provide their own perspectives on this issue, it will add to the quality of the present study.

In addition, all included articles must be published after the implementation of *all* child labour policies that the study is based upon, in other words, articles before the implementation of the ILO182, in 1999, were excluded.

Database

As Bryman has argued, the sheer volume of academic material that needs to be managed in a comprehensive systematic search is very time consuming and therefore not suitable in a student project: however, a *rapid review*, "which conform to many of the principles of systematic reviews but are deliberately limited in scope" can be more achievable, although the risk is that "the strengths of systematic reviews will be compromised" (2016, p102). After a number of test searches in different databases and search engines, the choice was made to use *Supersök [Supersearch]* at the University library (Gothenburg University Library, 2021). This search engine collects literature from all the resources that the institution has access to, which was an advantage for the present student paper as it guaranteed that no literature would need to be purchased. It also provided a wide, transdisciplinary scope which was judged to add richness to the data. As the number of search results in *Supersök* was manageable, it was not viewed necessary to use a more niched search engine. The limited number of search results does indeed imply that the scope of *Supersök* was not entirely complete and a wider search in other databases would possibly have provided a richer data (see below, in *Discussion*). However, although the chosen search strategy was expected to affect the quality of the study negatively, it was viewed to be an acceptable limitation for a master's thesis.

Peer reviewed articles

It was decided that only peer reviewed articles would be used, which excluded book chapters, dissertations as well as unpublished research, but it was a reasonable limitation for a student paper (Bryman 2016, p102). By only using research that has been subjected to the peer review process, it could also be assumed that the collected data was of good quality, thus eliminating

[9] How do the authors depict the child labour phenomenon in sub-Saharan Africa?
[10] According to the authors, are international policy instruments relevant for understanding and addressing the child labour issue in sub-Saharan Africa?
[11] Is a labour-free childhood a universally valid ideal and the appropriate way to ensure 'good childhoods' for children in sub-Saharan Africa?

the work of quality assessment. The search result (presented below) was filtered to only include academic journals.

Keywords and search fields

Through several test searches, the terminology of the field was studied and keywords that were appropriate for the purpose of the study were selected. Continued test searches of keywords, different ways of combining them and entering them in separate search fields in *Supersök* was conducted, resulting in the final search combination showed in Figure 2. Six searches (A-F) were made with different combinations of the selected keywords and phrases (Figure 3).

Figure 2.
Screenshot from Supersök, Gothenburg University Library (2020)

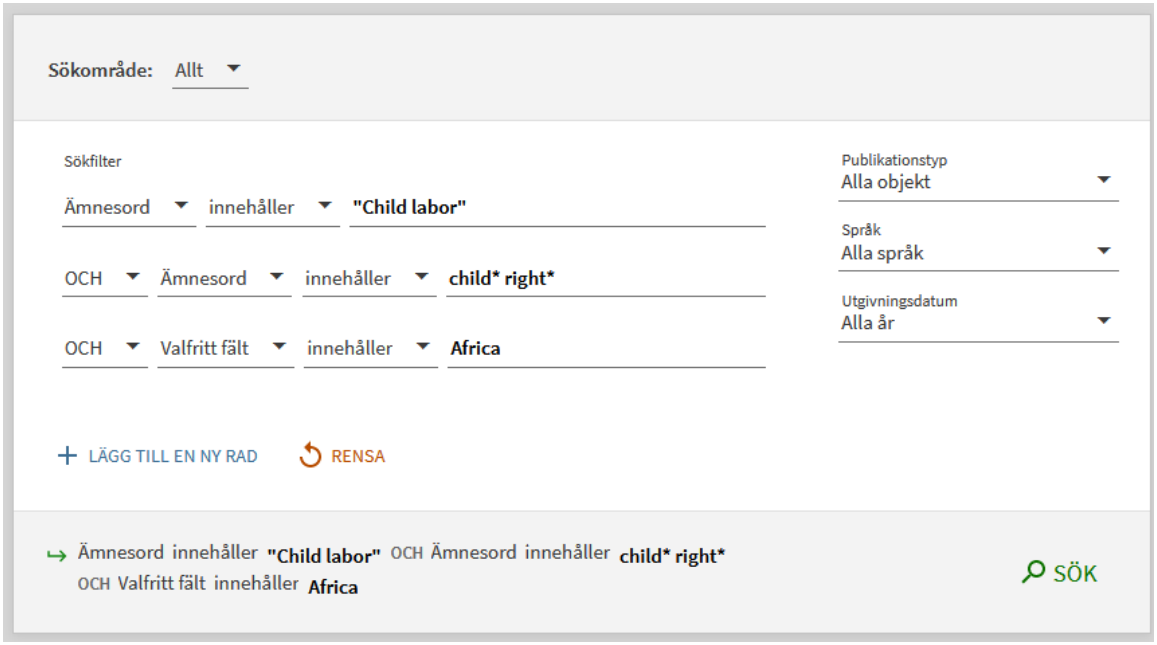

Figure 3.
Searches A-F.

	"Child labor"	"child labour"	child* right*	"ILO 138"	"ILO 182"	Africa
Ämnesord innehåller:	A,C,E	B,D,F	A,B	C,D	E,F	
Valfritt fält innehåller						A,B,C,D,E,F

Filter 'vetenskapliga tidskrifter': A,B,C,D,E F

"Child labor" / "Child labour"
The search combinations were doubled because of the two established spellings of the word 'labour/labor'. By using quotation marks around "child labour" in the field *ämnesord innehåller [keyword includes]*, results where this phrase had been stated as a keyword were found. This means that the search result included authors who meant child labour to be a prominent issue in their text; meanwhile, authors who had not chosen this exact phrase as a keyword were assumed to *not* intend a specific focus on child labour. By selecting *ämnesord innehåller [keyword includes]* rather than *är exakt [is exactly],* the search also included keywords with phrases like "child labour problem" or "legislation on child labour", as well as "child labour policy".

Child right*/ ILO138 /ILO182*
Several test searches were conducted to get hold on articles that discuss international child labour policy and to determine what keywords might be most appropriate. This proved to be challenging. For example, authors who refer to the United Nations Convention on the Rights of the Child may use the abbreviation chosen for the present paper (UNCRC), but other phrases also occur such as "The Convention of..." or "Children's Rights Convention" and so on. Finally, it was decided to try three combinations (that were doubled, because of the labor/labour spellings) with either 'ILO138', 'ILO182' or the truncated words 'child* right*'[12]. In this case, no quotation marks were used. This increased the number of irrelevant articles, for example some that had the keyword phrase "human rights" (which was a too general scope for the present study); but it also allowed for all variations of these words, such as "children's rights" or "rights of children", which lead to a higher number of relevant articles as well. The added work of manual relevance assessment was acceptable considering this benefit.

Africa
Regarding the geographic region that is the focus of the study, tests were made to enter 'Sub Sahara' or 'Global South', which was not proved to be fruitful. When trying specific countries like Tanzania or Kenya, or 'East Africa', the same articles were found if Africa was chosen instead, concluding that a more specified wording did not serve any purpose. By searching in *valfritt fält [any searchfield],* the word Africa may appear in the title, keywords as well as in the abstract in phrases like "in many African countries...." or "in Sub-Saharan Africa...". Test searches showed that this strategy gave the best results.

Assessment of relevance

The total result of the systematic search was 127 articles. An initial assessment of titles and abstracts excluded 104 articles on the following grounds:

- Doublets (17)
- Not peer reviewed (4)
- Language (1: one article written in Portuguese was excluded since there were no resources available for translation)
- Dated prior to 1999, when the ILO182 was written (3)
- Other geographical context than sub-Saharan Africa (19: eg Asia, Europe, the Americas)

[12] After the final relevance assessment, only articles that were found in the 'child* right*'-search remained, meaning that searches C, D, E and F could have been deducted. For methodological transparency, they are still included in the systematic search report.

- Not main focus on child labour: health (1), trafficking (8), slavery (2), child soldiers (4), poverty (2) street children (1), gender issues/ sexual abuse (3), early childhood care (2)
- Quantitative measurements of child labour (5)
- General discussions of child labour policy/ human rights /adults (20)
- Business ethics (12: e.g., discussions on how to approach the use of child labour in a specific company or business field)

The remaining 23 articles were quickly browsed, or read in full, to determine their relevance for answering the research questions of the present study (see *Inclusion criteria*, above). At this point, another 12 articles were excluded. One of these articles met all requirements; it was published in 1999, but before the implementation of ILO182, and it was therefore excluded.

The remaining 11 articles were of two kinds: either original investigations (8) or overview articles (3); all of them met the 4th requirement (RQ1 and RQ2), and most of them also met requirement no 5 (RQ3). However, in the full-text relevance assessment, a few articles were found that did not meet the requirements 3 and 4 (not sufficient focus on local discourses or lacking empirical data) but they did discuss children's work, child labour legislation and contemporary policy environment in Africa on a broad, generalised level and therefore added valuable insights regarding RQ3. As stated above, the research design of the present paper is a 'hybrid' literature review, where *systematic* methods are complemented with the strength of the *narrative* literature review. In the relevance assessment process, one article (Nieuwenhuys, 2007) was therefore specifically brought back into the final selection because it 'fills the gaps' and adds important information that is only briefly addressed in the other studies.

In Appendix A, a flowchart of the relevance assessment process is provided. The final selection of papers is, for the reader's convenience, presented in a separate reference list in Appendix B. A table over the included articles specifying methods, informants etc, is found in Appendix C.

Analysis and narrative presentation

The articles were analysed in two steps. The first read-through aimed towards identifying prominent themes that relate to the statements in the Ideal Type, for example, "what are the reasons for child labour in sub-Saharan Africa?" (descriptive statement); "what is a proper introduction for children into work according to African traditions?" (value statement). The themes were only roughly defined, and largely overlapping, but they served their purpose: to locate clusters of data that were suitable for answering the study's research questions.

The reader is advised to note that one of the identified themes related to issues of *demographics; health; the AIDS/ HIV-epidemic;* and *orphanhood /child-headed households*. These issues are presumably crucial to fully understand the African child labour situation: however, the choice was made for the present study to only refer to these issues briefly, in order to keep a sharp focus on the selected research questions. For further notes on this, see *Discussion; Methodological discussion* below.

After the first step of analysis, the remaining themes were laid out together with the ideal type into a grid system, with the themes along one axis, and the guiding statements of the Ideal Type (slightly altered, for convenience) in the other (see Appendix D). The grid included the following six themes:

- Development; health; age; concept of childhood
- Education
- Poverty; economic necessity; livelihood; survival

- Exploitation; inequality; power relationships
- Local community; culture; governments; politics
- Family; home; women

The articles were then read a second time, extracting the relevant data and laying it out in the grid. Colour codes were used for guidance in this process (not shown in the Appendix). The clusters of data that emerged in the grid were fitted together into a *narrative presentation* where the analysis is interweaved with the presentation of the collected data, inspired by Bryman's advice on narrative reviews: "Do not just summarize the literature [...] Try to use the literature to tell a story about it" (2016 p96). The narrative presentation of the literature was guided by the methodological approach of constructing *intertextual coherence*: "This refers to the way in which existing knowledge is represented and organized; the author shows how contributions to the literature relate to each other and the research reported" (Bryman, 2016, p93).

Ethical considerations

Issues such as participants' protection, informed consent and so on, that are commonly addressed in empirical studies (Bryman 2016, pp125-134), were not relevant for the present study since it was based on peer reviewed articles. The ethical discussion is therefore mostly concerned with academic *quality* and research *politics* (2016, pp134-144). The issue of *bias* has been mentioned above; otherwise, because of the nature of the ethical considerations of the present study, they will be addressed below in the section *Discussion; Methodological discussion*.

FINDINGS

The final selection from the systematic search will henceforth be referred to as *the included articles*. In the presentation of the findings, whenever *the author/s* are mentioned, it refers to the author/s of the included articles if not otherwise specified. When *policies* are mentioned, it refers to the ILO138, ILO182 and article 32 of the UNCRC, as presented above; however, the articles do also refer to other policies, including national legislation in African countries. The reader is advised to keep the limitations of this paper's scope in mind, and that it does not provide a complete overview of the global child labour policy landscape.

Concerning the terminology, the words *labour* and *work* are mostly used without a specific distinction, in alignment with the stance taken by Okyere (2012) who declares that "the terms child work or labour in this document refer to any sort of work done by a child" (p82). In addition, wordings like *economic activities* or *economic participation* are used as well, to point out that some of the tasks that children do are not easily identified as work in the sense of 'waged employment', but they do contribute economically in other ways, e.g. by producing food in the family farm, or by doing household chores that allow parents and other adult family members to spend more time in work outside the home (see for example Nhenga-Chakarisa 2010, p181).

Lastly, the terms *hazards* and *exploitation* are vaguely defined and sometimes used differently in the literature. The reader should note that this paper has interpreted the meaning of exploitation as the opposite of *agency* or *autonomy*; that is, if children have limited opportunities to exercise their agency or are not allowed to make autonomous choices for themselves – including the option to say no to work – this is perceived to be an exploitative situation. The terms hazard and harm are interpreted widely as something that is *detrimental* for a child; their opposite would be something that is *beneficial* to a child's health, well-being or development towards adulthood.

Outline of the findings

The findings aim to answer the research questions:

RQ1:	How do the authors depict the child labour phenomenon in sub-Saharan Africa?
RQ2:	According to the authors, are international policy instruments relevant for understanding and addressing the child labour issue in sub-Saharan Africa?
RQ3:	Is a labour-free childhood a universally valid ideal and the appropriate way to ensure 'good childhoods' for children in sub-Saharan Africa?

Each research question and theme from the analysis will be covered, but in order to allow a comprehensive and logic narrative report they will not be addressed in their categorical order. Instead, the findings are organised as follows:

1. The first section will provide an introductory presentation of traditional African livelihoods, family life and cultural views on work during childhood.
2. The second will draw from the data of the included articles and focus on what types of work the informants /participants are doing and how they are affected by it – whether it benefits them in some way, if they risk being harmed or exploited, or if it interferes with their formal schooling.
3. The third section relates to the idea that child labour is caused by poverty, and what this means in the African context. Poverty on both a family-, community- and state-level is addressed, including a brief historical review and comments on Africa's place in the global economy.

4. The fourth section dives deeper into the school-related points of the Ideal Type and what challenges that are identified for the sub-Saharan region in the included articles when it comes to 'redirecting' children from work to school.
5. The fifth section builds upon the previous sections and ties the findings together around the most central themes of the analysis: childhood notions; protection against detrimental labour; and African cultural values.

Section 1: Traditional African conceptualisations of work during childhood

The most common livelihood practice in sub-Saharan Africa has been sustenance farming in family groups (see Hilson 2012). Throughout history, a strong system of *kinship solidarity* ensured the welfare of each family member; in return, everyone were expected to take an active role and contribute to the needs of their household, including the youngest:

> At the heart of the African socio-political order lies the family, a unit which extends both vertically and horizontally. Family members are linked in strong reciprocal aid relationships which entails complex rights and responsibilities (Nhenga-Chakarisa 2010, p169).

In the traditional family farming economy, children started with simple tasks at an early age and were gradually given more responsibilities as they grew, matured, and learned. The authors note that work in African societies is highly *gendered*, and that this affects children as well:

> [A]n African girl child has the duty to clean the house, cook, fetch firewood, wash clothes and take care of younger siblings. All these burdens are meant to prepare her for motherhood. The boy child has the duty to work in the fields, to harvest and to herd livestock. These jobs are meant to groom the children to play appropriate roles when they become adults (Nhenga-Chakarisa 2010, p170).

Children's participation in the economic activities of the household was the way they learned necessary life skills and prepared for their future adult roles as women and men. Hence, work during childhood in Africa has been "generally viewed from the perspective of socialisation, training, learning, character building and skills acquisition" (Lubaale 2015, p26), and highly integrated into family life (Robson 2004, p239; Hilson 2008, p1235; Hilson 2012, p1667; Abebe & Bessell 2011, p772; Okoli & Cree 2012, p67; Fuseini & Daniel 2018, p10).

Along with the rest of the world, life in Africa has changed in modern times. For example, Okoli & Cree (2012) describe the circumstances of present-day Nigeria:

> Nigeria has undergone tremendous physical, political, social, economic and cultural changes since its independence from Britain in 1960. Social commentators suggest that these changes have had a major impact on the lifestyles and traditional values of the people, creating what Obinyan (1998, p. 64) has described as an 'uncomfortable fusion between tradition and modernity'. Increased urbanisation, sustained by rural urban migration, has led to failing family ties and relationships, increasing rates of divorce and remarriage and a tendency towards individualism, thus, Obinyan asserts, reducing 'communal considerations for people' (Obinyan, 1998, p. 64). Yet, traditional values remain, with important implications for the place of children in Nigerian society (Okoli & Cree 2012, p61).

An important finding of the present paper is that despite these changes, family collaboration in economic activities, in which children were included, is still very much in place. Okoli & Cree (2012) stress the importance of children's duties towards their parents and extended family, a notion that was embraced by the children themselves and expressed in interview excerpts such as "Good children should help their parents do whatever they tell dem [them]" (p 66; original authors' correction). The positive attitude towards children's work is noted and discussed in all the included articles, suggesting that these values, originated in Africa's traditional family-based

agriculture, have survived the processes of modernity. For example, *providing food* appears to carry a particular significance in African culture. It is "a shared responsibility between [children] and their parents" (Fuseini & Daniel 2018, p7), and although farming can be arduous at times, it is deeply embedded in African identity:

> Going to farm is evoked with a mix of pain and longing and is a joint struggle for survival, giving a strong feeling of belonging and strengthening group solidarity, and in some places is a lifestyle and an important part of what it means to be a family (Keilland & Tovo 2006, quoted in Hilson 2012, p1664; edited quote, cursives /parenthesises removed).

Even in families who are not engaging in farming, children are still doing their part to bring food to the table in other ways, e.g. by begging: "As I am going [to beg] it helps the family because the maize I will bring will be what my mother sometime uses to prepare food" (Fuseini & Daniel 2018, p7).

Several of the authors note that, for an outside observer, African children may seem to take on inappropriately high burdens by engaging in economic activities at too early an age: they "take on adult responsibilities" (Abebe & Bessell 2011) or 'play mature roles' (Hilson 2008, p1235; Robson 2004, p227). Based on the included articles, it appears that the concept of childhood as a care-free and, specifically, a work-free period of life, is not present in African thinking about childhood. Instead, work is regarded as something that *benefits* children's development: "integrating children into the working environment is one of the means through which they are empowered to endure the challenges of life as they grow up" (Fuseini & Daniel 2018, p10) and "a good child is one who obeys their parents and works hard to support themselves and their families" (Okyere 2012, p85). Giving them real responsibilities and having them work hard is perceived to "toughen them" (Nhenga-Chakarisa 2010, p175) and make them more resilient and prepared for adulthood (Abebe & Bessell (2011, p772).

In summary, in opposition with the child labour policies, African cultures have a positive view on work during childhood. There is "a cultural predisposition and acceptance of children's involvement in many forms of work" (Okyere 2012, p85), not only historically but also in present day societies and it is possible that this can, in part, explain the high prevalence of child labour in the sub-Saharan region. In addition, it is noted that African childhood is not strictly separated from 'adult' economic life, because the whole family functions an economical unit and children are active participants in providing basic needs for their households.

Section 2: How work impacts on African children's lives

The underlying assumption of the international policies studied in this paper is that labour is detrimental to children's welfare and development; however, as previously mentioned, the international discourse differentiates between harmful 'labour' and benign or possibly beneficial 'work'. One possible interpretation of the child labour policies is that their goal should not be to end children's work entirely: instead, the forms of work that children must be protected from are specifically those that are harmful to their health and development, exploitative, or interfering with formal schooling (see above). The central notion of the harmfulness of child labour is summarised in the Ideal Type in the following descriptive statements:

- Child labour is hazardous to the child's health.
- Child labour is detrimental to the child's development.
- Child labour is exploitative.
- Child labour interferes with school.

In order to explore what the 'labour vs work' or 'harmful vs benign /beneficial' opening in the policies means for African children, this second section of the findings will take a closer look

at the empirics of the included articles to lay out what specific kinds of work that the informants /participants in each study are doing, and to what extent the authors' depictions of these activities align with the Ideal Type statements.

Begging

Fuseini & Daniel (2018) performed qualitative interviews with eight boys, aged 10-14 years, in a Muslim community in northern Ghana. In this context, poor parents sometimes expect their sons to contribute to the household's economy by begging. The article's findings show that, often, the boys are coerced or forced to beg by their parents, but it can also be an autonomous choice. The money they collect pays for food for their family as well as things that they need for themselves, e.g., clothes and bicycles.

Fuseini & Daniel list several negative experiences that the boys report, both physically and psychologically, such as abuse, exposure to weather, dangers in traffic etc:

> The first author observed some child beggars leaving the village one day morning at 8:30. One of them said for him if he does not go his father would cane him and all of them said they would like to be in school. They returned 10 h later, drenched by a downpour, bare footed with their thread-bare clothing soaked (2018, p6).

The positive outcomes of begging are mainly economic relief for themselves and their families. To some extent, they may learn business skills, but mostly, begging is perceived as a 'dead end' activity since it is not viewed as appropriate to continue begging over a certain age. Begging can make it difficult for them to attend school: however, they also need to beg to get money to pay for their schooling, e.g., examination fees.

The authors' conclusion is that begging has many risks, both in short and long term, but it is nevertheless necessary for these children to do it. Without any other source of income, they have no choice but to try to beg for their basic material needs, as well as to finance their education (Fuseini & Daniel 2018).

Street vending

Okoli & Cree (2012) base their article on the first author's PhD dissertation which studied children's activities around a marketplace in Enugu, Nigeria, performing participant observations and interviews with both children and adults. Street vending included tasks such as "retailing various wares from food and household goods to toys, second-hand clothing, mobile telephones and accessories. Some carried their wares on their heads inside cartons, woven baskets, plastic or metal basins; others sold from wheelbarrows" (p65).

Noting that street vending is mentioned by the ILO as a hazardous form of work (p59), and prohibited in Nigerian legislation (p60), observations confirmed that the environment could be hard, unpleasant, and scary for the children: both verbal and physical abuse occurred. The interviewed children did not deny these hardships, but they also had positive feelings about their work. Street vending provided opportunities for fun, play and leisure and could include exciting things like visits from magicians (p65). Some children had previous experiences of domestic work and preferred street vending (p66).

An important note is that they worked alongside their parents (typically the mother) and siblings in a form of apprenticeship (described in the section *The intersections of meanings of work with family and kinship*, p66-67) and that their contributions were necessary to their households' economies. Regarding the issue of exploitation, the authors comment:

> Whatever their personal feelings about vending, all the children interviewed were aware that their labour were a necessary contribution to family income. Work was also a duty owed in return for their families' love and support […] Whether they felt they had a choice in this is a moot point. As

> Useni (aged eleven) said: 'How can you say 'no' if your mother asks you to help her in what she is doing?' (Okoli & Cree 2012, p66).

In all, however, they suggest that street vending children have significant agency in their situation and that this type of work should not be viewed as entirely "damaging and abusive" because, for the informants, "it was, to a large extent, an inevitable part of their lives, exciting and fun, and also hard and unpleasant" (Okoli & Cree 2012, p69) and an integral part of family life.

Giving palliative care

Robson (2004) presents the perspectives of nine young people in Zimbabwe who, during the AIDS/HIV-epidemic, were given the responsibilities to care for close relatives who fell terminally ill. The reader is provided an example of what the work of caring entails by describing young Rindai's routine during his mother's last six months of life: "Each day Rindai carried his mother outside to sit in the sun, took her to the toilet, and brought her food and drink" (p227).

The article maps out the processes that determine why/who is allotted this work and notes that they have very little options to choose another path. Robson stresses that young people in Zimbabwe have a limited influence in matters of their own life, especially when they are of a poor and "less sophisticated rural background" (p235). The *kinship solidarity* system plays an important role and a risk of exploitation, as a direct consequence of the expectations within African societies that children should contribute to the household's needs, is apparent in Robson's findings. Additionally, caring often meant abandoning their education and thus missing out on qualified work opportunities.

In the case of Rindai, the citation above continues:

> His mother withdrew him from school and Rindai couldn't even go out to the shops and do normal 15-year-old things. Adults around him gave him a lot of verbal appreciation. Although he did not voice his frustrations about having to leave school, and not being able to go out, Rindai must have wished he had a sister or other siblings who could have helped. The experience made a big impression on him. He matured overnight (excerpt from interview with a UNICEF worker; Robson 2004, p227).

Even though the author notes that the tasks of giving palliative care affects the informants negatively in many ways (p237), she shows the complexity of the situation and highlights the importance of young people's contributions to their families' needs. She argues that:

> Children are not merely passive victims of processes resulting in them becoming carers, but they can also be considered agents. Taking on caring ensures continuity of the household (rather than break up) albeit in a changed form [...] caring by young people is a creative and active response by them and their households in the face of crises of social reproduction (Robson 2004, p239).

Domestic work

Several of the included articles mention the widespread phenomenon in sub-Saharan Africa of *child relocation*, for example young girls who are sent to family members (e.g. aunts and uncles) to help in household chores (see Nhenga-Chakarisa 2010, p181). Jacquemin's article (2006) studies the outcomes of a project run by a local organisation aimed to support young domestic workers in the Ivory Coast's capital city, Abidjan. The use of young domestic workers is so widespread in this region that it is visible in the city's demographics: "This surplus young female population is on account of migratory flows from the countryside to the city, where most of them are put to work as domestics" (see Table 1; Jacquemin 2006, p391).

She describes the tasks of domestic workers as follows:

> Around their homes, they load basins of water on their heads, carry gas bottles or bags of coal, and yams or maniocs to cook meals; they sweep the courtyards, help with the cooking, scour pots and pans, do the laundry and look after small children; in the city streets, they sell sachets of iced water, oranges, or roasted peanuts; in front of schools, offices and factories, they help women sell snacks, etc (Jacquemin 2006, p390).

According to the author, the "ancient practice of child fosterage" (p391) is a traditional arrangement that has expanded in recent years into new forms where the girls are not necessarily placed with someone who they have a family connection to. Additionally, while the traditional fosterage system often did not include any monetary payment to the girl but instead, they were provided with food, clothes etc. and perhaps a departing payment (e.g., dowry or kitchenware; see p391), today, some categories of domestic workers receive a monthly pay as well.

Jacquemin identifies several risks for domestic workers, many of which are related to the relationship between the girl and her employer. The girls are often very dependent on their host family and have limited say over their situation. The work itself can be taxing with long hours, heavy lifting etc. It is also mentioned that they risk STDs and pregnancies[13] (p396). Despite the negative effects, the interviewed girls insisted that they should be allowed to work, even those who are younger than the required age (15). Considering their economic reality, abstaining from work is not an option. The article quotes Martine, 17 years old:

> No, really, this idea to stop younger girls to work, it's not possible! See the situation: everybody has to look for money! Even those working girls who're not paid, they get something in the end, they wouldn't otherwise (Jacquemin 2006, p397).

Jacquemin does not elaborate on possible benefits from domestic work except economic. She confirms that they hardly have any other option than to accept their positions as domestic workers for their own survival, as well as to help their families: "my parents are too thin, it's the only way I can help them and do something for me as well" (Haoua, 14 years; Jacquemin 2006, p398).

Domestic work, as reported by Jacquemin, apparently aligns well with the Ideal Type when it comes to how work affects the child negatively, including some heavy and hazardous tasks that may harm them both physically and in other ways, and it does not seem to be common that domestics are allowed to attend school (p392). Most prominent in Jaquemin's analysis is the risk for exploitation, which in part can be derived from the cultural practice of fostering: "Under the pretext of 'helping' poor rural relatives, some [placement agencies] have created networks to place little maids, which under the cover of fosterage are close to child trafficking" (Jacquemin 2006, p394). Similar concerns are addressed by Robson (2004, p235) and Lubaale (2015, p25) which shows a paradoxical detail in the policies: according to the Ideal Type, work performed within family settings is assumed to be safe and is to a certain extent excepted from the policies' goal of abolition. This will be further discussed in the fifth section of the findings, *A childhood protected by the family and the state,* below.

Artisanal small-scale mining (ASM)

Three of the included articles are original investigations studying ASM. The fact that mining is given much attention in research is perhaps not surprising, since it is a form of work that has been specifically singled out and defined as a 'Worst Form' of child labour. Okyere (2012) notes:

> [T]he site's environment and the nature of work performed there presented potential health and safety challenges to the children, as the ILO has argued […] It is therefore understandable why the

[13] This implies a risk of sexual abuse: however, this is not explicitly discussed in the article.

> ILO and other commentators advocate for the immediate removal of children from such engagements (Okyere 2012, p85).

However, both Okyere (2012) and Hilson (2008; 2012) promote a more nuanced understanding of the nature of children's work in ASM and the need to look beyond some common assumptions.

Hilson argues that one must look at why *adults* have turned to this line of work in the first place. In both his articles he stresses the challenging conditions for agriculture in the studied regions. In the Upper East region of Ghana, he writes:

> The region's extreme aridity, highly-infertile soils and irregular rainfall patterns restrict agricultural activity [..] there are significantly fewer alternative income-earning options available for inhabitants than their counterparts in the south, where climates can support seasonal agriculture (Hilson 2008, p1239-1240).

In his second article, he goes into more detail to explain how traditional, family-based farming and ASM are connected:

> [ASM] is by far the most important rural nonfarm activity in sub-Saharan Africa, providing numerous subsistence households with the moneys needed to purchase fertilizers, build structures and send children to school. Since these two economic activities dovetail, it can be assumed that many of the families farming together are also mining together (Hilson 2012, p1664).

He continues to suggest that in the processes that he calls *livelihood diversification*, children's 'farm hands' become 'mine hands' (2012, p1664), meaning that patterns of work allocation within families remain the same when they either combine both activities or move completely into mining, and that "the tasks children carry out in ASM communities are the same as those undertaken on family farms" (p1665).

As previously mentioned, the *gendered division* of work in African societies is mirrored in children's work as well. This has been shown above regarding begging, which is viewed to be an activity exclusive for boys, and in domestic work as well as palliative care, which mostly falls upon girls, although boys are also involved to some extent. In the case of ASM, Okyere (2012) describes the different options that are available for girls and boys respectively.

> Children's work at the site, like that of adults, followed highly gendered patterns. This gender discrimination mostly affected girls and limited their work opportunities to the fetching of sand, stones and water [...] Girls also worked as hawkers, kitchen and shop assistants, food sellers and in roles traditionally seen as female's work. The boys on the other hand used hammers, metal pestels and other implements to crack extracted gold ore into smaller pieces. Rarely, a few of the relatively older boys also worked as machine operators grinding the cracked rocks into a powdery form to be mixed with water for processing [...] Other worked in general roles such as running errands (Okyere 2012, p83-84).

Hilson mentions tasks like carrying water and firewood, cooking and cleaning (2012, p1669). He suggests that the tasks that children perform in ASM may in fact be more similar to what otherwise is considered 'light work' in a household, which the policies do allow (see Hilson 2012, p1665) rather than what is stereotypically perceived as detrimental 'Worst Form' mining work. Neither Okyere nor Hilson denies the possibility of hazards for children within the ASM sector, such as injuries or mercury poisoning, but "at the time of this research, there was no mercury being used to amalgamate gold; nor were children working inside the pits with their parents or being asked to carry out hazardous mine-related work" (Hilson 2012, p1669). Other common negative assumptions about ASM were not observed by Okyere:

> The men, women and children were not employers or employees of each other; rather they were all hustling and scraping out a living through mutual dependence and collaboration. This was

> exemplified by the fact that the children were not bound by any contracts or agreements to work with anyone at the site; or indeed to take up work there in the first place. In any of their engagements, they were at liberty to stop and go home at any time of their choosing. Also, as opposed to having work imposed on them or being told what to do, they themselves chose the work they did [...] Overall, the ways in which children worked at the site were devoid of abuse, violence, bondage, servitude, exploitation and other ills that mark children's employment in such scenarios elsewhere. None of the participants mentioned any cases of maltreatment or abuse in their work at the site; neither did the researcher's own observations and enquiries reveal anything of that nature (Okyere 2012, p84).

One reason why children are attracted to ASM is that it is lucrative and easily combined with schooling (Okyere 2012, p86). For example, the majority of Okyere's informants (50/57) were enrolled in school and worked at the site during weekends and vacations (p83). Nevertheless, it was not a preferred occupation for the informants: "No one has to tell me this job is bad" (quoting Janet, 16 years old; Okyere 2012, p85). However, considering the circumstances, neither of the authors believe that it would be beneficial for these children to be 'removed' or 'rehabilitated' from ASM (see Hilson 2008, p1239; Okyere 2012, p88).

In summary, the data of the three ASM-related articles does not indicate that children's work in this field is entirely detrimental, but it has both negative and positive effects, and again: similarly to other types of work presented in this paper so far, their work is driven by basic economic needs as well as to pay for their education. Insisting on excluding children from work in ASM "threaten[s] to narrow their already limited options even further" (Okyere 2012, p87).

Summary

This section has looked closer on seven of the included articles that are based on original investigations and found that the authors' views on how children's work impacts on their life aligns with the Ideal Type to some extent. Regarding the issue of *exploitation*, parents and other adults are sometimes forcing or coercing children to work, but if that is the case, they often accept the given tasks willingly. Arguably, one could say that it is not really their parents that force them into work, but circumstances outside each individual family's control that creates a situation where adults alone are not able to provide their children with their material needs. Some *hazards* of both physical nature, as well as psychological /emotional /developmental etc, have been found, and also that work make it difficult for some children to *attend school*. However, an important note is that even when children engage in hazardous and exploitative occupations, they do it to improve their circumstances. As Okyere puts it:

> [W]hile others see their removal from the hazards at the site to be of primary importance, the children's own priorities lay with addressing the 'hazards' they faced due to poverty and resource constraints. For them, child labour has actually been the solution and not the problem (Okyere 2012, p88).

The remaining five articles that are included in the analysis mainly provide similar views on the matter. Nhenga-Chakarisa (2010) points out that laws and policies are mostly concerned with *physical* hazards, and *risks* rather than actual harm (p187-188) and that they ignore psychological and social dimensions of work that can "mitigate against detrimental outcomes, contribute to a child's resilience and facilitate development" (Nhenga-Chakarisa 2010, p188). Abebe & Bessell (2011) argues for the need of further research, particularly on the issue of children's involvement in exploitative work, and, in line with Hilson (2008, 2012), point out the problem of stereotypical assumptions in laws and policies:

> Just as we know too little about the nature of economic and social exploitation, so too do we know too little about the deleterious impacts of work in children's health (physical, psychological and emotional), making it difficult to determine the kinds of work from which children should be excluded or to identify the precise ways in which work may be made safer for children. Decisions

> on such issues are often driven by assumption, ideology and normative values rather than by robust empirical evidence (Abebe & Bessell 2011, p779).

Lubaale (2015) is the only author who takes a clear stance for an immediate eradication of child labour in sub-Saharan Africa. In her definition of child labour, she writes: "Child labour is characterised by dangerous and exploitative work, carried out at too early an age, involving long working hours, poor working conditions, insufficient pay and involves excessive child responsibility" (p26). In the context of the present discussion of the distinction between benign/beneficial work and detrimental labour, Lubaale's approach is understood as to be focused exclusively on the latter, meaning that she has excluded the forms of work that may be considered acceptable for children from the scope of her article. On a similar note, Nhenga-Chakarisa points out that her article only deals with 'general' forms of work "rather than the worst forms […], the dangers of which are universally acknowledged and condemned" (2010, p167). However, according to Nhenga-Chakarisa, the distinction between 'labour' or 'work', 'light' or 'hazardous' work etc is not entirely straightforward:

> Unless children are looked at within a proper context [...] there are bound to be misunderstandings in defining child labour. Recent studies on child development suggests that children's ability to work, and to benefit or suffer from it, varies significantly from child to child. The new research also shows that child work has many effects, some good and some bad, not all of which can be separated from each other (Nhenga-Chakarisa 2010, p181-182).

In all, a synthesis of the included articles suggests that the child labour policies may not fully understand how work impacts on African children's lives, and most of the authors insist that some regulations need to be changed in order to *allow* children to work, especially those whose survival depends upon it.

Section 3: Understanding child labour and poverty in sub-Saharan Africa

As mentioned above, in the dominating child labour discourse, poverty is viewed as a main reason for why children are engaged in work. This is addressed in most included articles (see for example Hilson 2008, p1235). In the Ideal Type, this conception is summarised in the following statements:

- Child labour is caused by poverty.
- Child labour should be eliminated through alleviating poverty.

This third section of the findings looks at poverty in sub-Saharan Africa with the aim to understand why and how it may contribute to the high prevalence of child labour in this region. The reader is advised to note that as the findings presented here are focused on the most challenging circumstances for the poorest and most vulnerable children and families, they *do not* apply to the whole sub-Saharan region and can therefore not be generalised.

African economy

Although sustenance farming is still an important livelihood strategy throughout sub-Saharan Africa, agriculture has become increasingly difficult to maintain. Some challenges mentioned in the included articles are climate change (Abebe & Bessell 2011, p771; Hilson 2012, p1669), loss of land to mining corporations (Okyere 2012, p83) or hydroelectric dam constructions (Hilson 2012, p1669), and decreased profitability of cash crops and higher prices for farming necessities such as fertilisers (Abebe & Bessell 2011, p774; Hilson 2012, p1669). People have therefore been forced to move to new areas and search for alternative income opportunities. As

previously mentioned, urbanisation has played a certain role in the restructuring of African societies (Okoli & Cree, 2012) but the majority of the population still lives in rural areas (at the time of the writing of his article, 80%; Hilson 2008, p1235). Artisanal mining is one of the ways that rural families can "diversify their income bases" (Hilson 2008, p1233). Another strategy for economic survival is to send male family members to cities (or abroad: Nieuwenhuys, 2007, p160) for paid employment while women and children stay in the villages, which has implications for children's work: "The migration of men to seek employment in urban areas or elsewhere has frequently increased rural women's and children's workload in maintaining the household" (Abebe & Bessell 2011, p777).

As native African livelihood strategies become more strained, global economic forces also play an important part in the changes of work patterns and children's involvement in work. Lubaale (2015) discuss the presence of *transnational companies* (TNCs) in Africa, that, in pursuit of higher profits, outsource production to countries where labour is cheap. "Use of child labour is an often inevitable outcome as children usually require less pay" (Lubaale 2015, p27); indeed, it may even be unpaid, for example in cocoa farming where they participate in the harvest of cocoa beans within the family collaboration umbrella (p27). According to Nieuwenhuys, Africa's advantage in the global economy is "its vast reservoir of cheap labour" (2007, p158) which attracts foreign investors - and, being unpaid, children are the cheapest labour of all. The global demand for low labour costs may therefore lead to increased child labour in regions such as sub-Saharan Africa.

While child labour policies are signed by *states* and intended to be enforced through national government efforts, TNCs operating beyond national borders can be difficult for individual states to control:

> Most developing countries face individual TNCs with revenues many times larger than their domestic economies […] Grouped together in trade associations with the active support of their home countries, TNCs exercise inordinate influence over local laws and policies (Lubaale 2015, p27).

Such "non-state actors" (p26) "can hardly be penetrated by states, yet they remain a hindrance to the protection of children from child labour" (Lubaale 2015, p30). Another factor that contributes to the challenges of state-led regulation of child labour is that African economy is *rural* rather than *urban* (Hilson 2008, p1235); instead of *formal employment*, many engage in *informal* economic activities in private, domestic settings (Robson 2004, p233; Hilson 2008, p1236; Hilson 2012 p1668; Lubaale 2015, p25); and because of the low level of infrastructure, governments' influence in *distant rural areas* can be limited (Hilson 2008, p1236). As the findings have shown above, there is indeed reason to believe that children are subjected to harmful effects of their work: however, several authors question what impact a *formal approach* can have on child labour practices in sub-Saharan Africa where a large portion of children's work is informal, hidden or embedded in private family economies. For example, policy provisions that require that children's time in work is regulated so as not to be too long, or interfere with school, should be very difficult to enforce in a scenario like that described by Okyere, where children, their families and other community members are "not employers or employees of each other; rather they were all hustling and scraping out a living through mutual dependence and collaboration" (quoted above; Okyere 2012, p84; see also Okoli & Cree 2012, p60). In particular, children's *domestic work* such as giving care is "invisible in the geographical imaginations of global northerners because they do not correspond to the stereotype of 'exploited Third World child worker' labouring in a factory producing export commodities" (Robson 2004, p233).

As previously described, Western child welfare systems are *professionalised* and *institutionalised* (Cregan & Cuthbert 2014), and international child rights policies are drafted

by professional 'child experts' (see *Background*). The included articles provide several examples of families and children who dismiss formal laws and regulations because they simply do not make sense in their situation. This is apparent for domestic workers who are required to be 15 years old: "maybe I could tell them that I'm 15!" (Jacquemin 2006, p398); street vending that is prohibited by national law (Okoli & Cree 2012, p60) and in ASM where entire communities emerge around operations that are illegal (Hilson 2008). For these families, the fact that the state prohibits a certain economic activity is irrelevant. If something provides the opportunity to make a living, they must take it, and do the best they can to distribute all the necessary tasks - waged employment as well as domestic, reproductive work - that needs to be done amongst family members in order to provide everyone with their needs. As suggested by several authors, African economy is largely informal: likewise, based on this analysis, it would seem that African poverty is solved, not by the state, but in day-to-day life by individuals and communities *outside formalised systems* of governments and laws.

Poor households and poor nations

In the first section of the findings, it was established that work is a normal and acceptable part of childhood in African cultures. However, when households are facing hardship, children may be needed to take on more burdensome responsibilities or even to engage in work that normally would not be considered to be appropriate for them: "In Benin, many parents recognize child labour as problematic, but use economic explanations, as indicated by the expression 'if I eat sand, my children eat sand' to justify it" (Nordtveit 2010, p707). Collecting the findings of the articles, it is evident that when an African household is put under economic stress, the traditional family collaboration, or "pooling resources" (Okoli & Cree 2012, p60) mechanism, is taken into action, and everyone, children, and adults alike, step in to do their part. Poverty – or rather, challenges in providing a viable livelihood, whether it is done through paid employment, farming or in other ways – can thus lead to increased use of children's labour if adults are not able to provide sufficiently for the household. According to Hilson, increased child labour in the region of his study is caused by "the lack of viable economic alternatives for adults" (2008, p1239), and "the labour of a child can be crucial to a household's survival" (Hilson 2012, p1667; see also Abebe & Bessell 2011, p772; Fuseini & Daniel 2018, p4; Okyere 2012, p86-87; Lubaale 2015, p23).

Some of the included articles elaborate on the dire state of the communities where their studies are performed. For example, Okoli & Cree describe Nigeria as a country with "some of the worst social indicators in the world: one in five children dies before the age of five […] More than half of the population lives below the poverty line; life expectancy is forty-seven years" (2012, p61); Hilson (2008, 2012) elaborates on the poverty of Ghana and Mali; Nordtveit's stratified sampling aimed for "areas of significant poverty" (2010, p701) for his study; Fuseini & Daniel's (2018) study was conducted with children from very poor families. To fully understand the context for families and children in the most impoverished circumstances in sub-Saharan Africa, one must consider not only the poverty of individual households but also the poverty of the nation state and how this relates to children's work.

As noted in the *Background*, sub-Saharan nations have the highest child labour prevalence in the world, and they are also former colonies, while the countries that are most successful in providing labour-free childhoods are former colonisers in the West. The heritage of colonisation has a significant impact on how the development of welfare systems, including those relating to child welfare, in different parts of the world have progressed during modern history. Nieuwenhuys (2007) provides a brief background that helps to understand how Western countries, where the use of child labour was widespread in the initial phases of industrialisation, ended children's involvement in work in the late 1800's:

> The situation drastically changed by the end of the nineteenth [century], when men took the place of children and both women and children could be excluded from industrial employment. Men's wages stabilized at the level of a 'family wage' in which allowances were made for the subsistence of women and a relatively small number of children, guaranteeing the net reproduction of the working-class family. The payment of the family wage was crucially premised on the massive availability of cheap colonial commodities (tea, wheat, cotton, wool, etc.) that significantly enhanced its buying power but as well on the displacement of labour intensive food and raw materials production to the colonies (Nieuwenhuys 2007, p151).

At this time, children in the West began their journey towards a labour-free childhood; meanwhile, the circumstances of children in the colonies were largely ignored. According to Nieuwenhuys there is reason to believe that their work burdens were increased under colonial rule. Thus, "child labour elimination in [the West] went hand in hand with new forms of child exploitation unfolding in the colonial dominions" (Nieuwenhuys 2007, p152).

As African nations gained independence in the mid-1900's, the newly formed states were poor, but nonetheless embarked on ambitious efforts to build societal infrastructure and welfare institutions, in some cases rather successfully[14]. However, the global economic crisis in the 1970's put an end to the route – often a socialist /communist model – that many African states had chosen for themselves. They were eventually forced to accept economic interventions from Western financial institutes such as the World Bank and International Monetary Fund (IMF). Lubaale (2015) describe how the *Structural Adjustment Programs* (SAPs) aimed to get African governments' economies in order by opening up to free market principles (e.g., end price control), privatisation of former government enterprises (electricity, water, telecommunication etc), and restricting government spending (2015, p29-30) with far-reaching consequences for the welfare of children. According to Nieuwenhuys:

> In virtually all countries of the south [the SAPs] entailed dramatic cuts in social spending and the roll back of the state. Protected food prices, feeding programmes and free primary education and health for the mass of children became gradually a thing of the past (Nieuwenhuys 2007, p154; see also Robson 2004, p230).

Implementation of the SAPs was often a condition for loans and to receive aid (Robson 2004, p239) which left African nations with little choice but to accept them, despite "parliamentary and public opposition" (Lubaale 2015, p29-30; see also Nieuwenhuys 2007, p160). Although the programs were well intended, and did not deal directly with children, their ultimate outcome have been "devastating for vulnerable populations, especially the poor" and "create conditions that are opposite to what is needed to end child labour" (Lubaale 2015, p29). With less fiscal space, governments have not been able to provide resources for policy implementation (p30) and, in addition, "the privatisation of state owned enterprises has not only contributed to increased prices but also compromised the state's ability to regulate the use of child labour" (Lubaale 2015, p29).

Robson's article provides an illustrative empiric example of how young people are directly affected by underfunded welfare, in this case healthcare: when health institutions were overwhelmed by the HIV/AIDS-epidemic, the Zimbabwean government promoted home care for the terminally ill. Robson argues that when states "retreat from intervention in social programmes" (2004, p230), the responsibility for social reproduction falls on the private domain, and it is often taken by women and children, in particular girls (Robson 2004, p232; Abebe & Bessell 2011, p773).

[14] For example, Tanzania had almost full enrolment in primary school at the end of 1970's (Wabike, 2015).

Women's and children's unpaid work

Several authors point out the connection between women's and children's work. According to Hilson, literature has shown that "the tasks performed by young children [in sub-Saharan Africa] [...] tend to be typical women's tasks" (2012, p1665) and children's contributions are often an extension of women's domestic work (Abebe & Bessell 2011, p771; Jacquemin 2006, p400). Thus, when changing economic circumstances, e.g., cuts in government spending, lead to increased work for women, children's burdens will also increase (Abebe & Bessell 2011, p772; Robson 2004, p232-233). For a comprehensive understanding of child labour in sub-Saharan Africa, it is therefore highly relevant to pay particular consideration to women's domestic and informal work, which is often unpaid.

In rural areas, "tasks that take little or no time in an urban setting - like getting a glass of water - become extremely time consuming where basic infrastructure and services are missing" (Keilland & Tovo 2006, quoted in Hilson 2012, p1665), but even in cities such as the capital of Ivory Coast, housework is very demanding which is why "households from almost *all* social backgrounds, from the poor to the middle classes, make use of young domestics' services" (Jacquemin 2006, p391; original author's emphasis). Notwithstanding the gendered division of work, if male family members are not able to earn enough income to support the household, women will be forced to leave the home for paid employment: when they do, girls will take over the household chores in her place in what Hilson calls the "substitution effect" (2012, p1670). It applies for boys as well, "who sometimes do men's work if there is not enough men around to perform such tasks" (Keilland & Tovo 2006, p27, quoted in Hilson 2012, p1670), but it has a particular significance for girls, who in the end are allotted the grunt of unpaid reproductive work.

> "[W]omen are the primary recipients of the benefits of children's labour. Although the gender of the child is the main determinant of children's work assignments, in most societies both sexes perform women's activities, whereas girls rarely undertake men's activities in any society [...] while children are expected to help out, their labour in many ways gives women the power, freedom and time to conduct speciality chores outside the home, and in some cases to engage in upward social mobility. It is important to note here, however, that men benefit substantially from the labour – both paid and unpaid – of both children and women. It is the gendered – and, we could argue, generational – division of labour that perpetuates and reproduced patriarchy. This is demonstrated in the graduation of boys into men's work, while girls remain relegated to women's work, including unpaid domestic work (Abebe&Bessell 2011, p776).

Considering how laborious domestic work is in poor contexts in sub-Saharan Africa, the prevailing gender patterns, and the unresolved poverty pushing women into waged employment, children - mostly girls - will be needed as unpaid domestic workers: "As in African homes domestic work remains highly time and energy consuming, it is impossible for *one* woman to combine remunerative work with housework" (Jacquemin 2006, p400). This leads to a discussion of the value of domestic work. Although in the general economic discourse it is mostly dismissed as unproductive (Abebe & Bessell 2011, p775; Okoli & Cree 2012, p69; Jacquemin 2006, p401), the included articles show that women's and children's unpaid work plays a crucial role in national economy:

> Despite the low esteem generally given to children's work, many sectors of African and developing country economies (especially the informal sector, peasant subsistence agriculture and petty commodity production, as well as daily, generational and social reproduction within the domestic sphere) simply would not function without children's labour (Robson 2004, p241; see also Jacquemin 2006; Nieuwenhuys 2007).

Summary

The findings indicate that poverty is indeed part of the explanation for the high incidence of child labour in sub-Saharan Africa: however, the solution, to 'alleviate poverty', must be considered an almost insurmountable challenge in the current situation. As Lubaale (2015) pointed out, African states have extremely limited opportunities to implement changes while other countries, notably from the West, are excerting economic pressure that *increase* the use of child labour in African countries (e.g., the SAPs and TNCs; Lubaale 2015). This injustice is emphasised by Nieuwenhuys (2007):

> Globalisation has opened up ways of tapping a steady stream of disposable adult labour through temporary immigration [...] and outsorcing [...] This labour is cheap because it is embedded in a family economy where women, the elderly, and particularly children provide a host of services for free […] World Bank economists successfully claimed that where patterns of subsistence farming, mutual help in child care, the exchange of services and loans among neighbours and kin and so on are at work, in short where family economy is still well in place as is widely the case in the global south, governments need not only provide additional welfare services but can safely 'do more with less' [...] What the economists failed to highlight was that children [...] play a crucial role in all these activities (Nieuwenhuys 2007, p160-161).

In light of the findings presented here, such attitude towards the management of African governments appears unsympathetic and ignorant about the real economic situation in the sub-Saharan region, especially the place of women and children in the economy, where girls are particularly vulnerable. As one of Hilson's informants, a mother of 11, explained: "My three boys are educated but my eight girls not. Why aren't my girls educated? If I sent them to school, how would I survive? They are doing all the cleaning, washing and *maraîchère*[15] while my husband and I mine" (2012, p1671).

Section 4: A labour-free, school-only childhood

This fourth section looks closer on the school-related issues presented in the Ideal Type in the following points:

- Child labour is caused by inadequate education.
- Child labour should be eliminated through redirecting children from work to school.
- States should ensure a labour-free childhood by instituting and enforcing a minimum age for work that aligns with the completion of compulsory education.
- Compulsory education must be free and accessible.

Compulsory schooling and minimum age for work

Looking at the excerpts from the Ideal Type above, it would seem that the intentions of the policies are to create a 'binary' childhood: at least up until the completion of primary education, children should be exclusively occupied in school, and work should not commence until after schooling is completed. Work and school are presented as incompatible, and since school is the only eligible occupation before the age of 15, children who are engaged in work before that age /school completion must be 'removed' and 'redirected' to school, according to the policies (Abebe & Bessell 2011, p770; Nhenga-Chakarisa 2010, p162-163).

The binary school-and-then-work separation is commented by Nhenga-Chakarisa: "It would seem that the Minimum Age Convention was motivated by an assumption that, if the minimum age were raised, the physical and mental development of children would be enhanced" (2010, p163), although she is not convinced that this assumption is correct:

[15] Subsistence farming.

> While it is generally conceded that minimum age laws have been effective in removing children from formal employment, an issue which has been well researched, it is, however, still unknown whether the laws have improved the development and the welfare of the children concerned (Nhenga-Chakarisa 2010, p184).

The dominating discourse, however, maintains that work is detrimental to a child's development while schooling is beneficial. Schooling is believed to be the best 'antidote' to child labour (Nhenga-Chakarisa 2010, p185; Hilson 2012, p1664; Abebe & Bessell 2011, p769; Hilson 2008, p1237; Nordtveit 2010), and by making formal education compulsory, parents and other guardians will be forced by law to send children to school instead of work. It is also assumed that when compulsory schooling is enforced, children will not have time to engage in work because they spend their time studying (Hilson 2008, p1235). Unfortunately, according to some authors, this reasoning disregards the economic reality of many families in sub-Saharan Africa. As this paper has shown, many children work because of economic necessity, and in cases where a child's time is conflicted between school and work, stopping work would not correct the situation because without work, they would lose their means of survival. Therefore, there is a risk that compulsory schooling will only add to children's already existing burdens of work (Abebe & Bessell 2011, p772; Hilson 2012, p1671; Nieuwenhuys 2007). The policies, on the other hand, are designed to promote a childhood where schooling and work are discrete activities separated by the minimum age, in order to ensure the most beneficial development for individual children as well as for communities and nations as a whole:

> A high incidence of child labour is considered to indicate current and predict future under-development. The separation of childhood from the world of work – including valued and valuable work – becomes a yardstick of modernity, as does the number of children enrolled in school. International policy has been shaped by the view that school attendance is the most appropriate activity for children (Abebe & Bessell 2011, p769-770).

A synthesis of the included articles shows that the idea that compulsory schooling will protect children from work is flawed. Abebe & Bessell (2011) explain:

> Childhood becomes synonymous with school, while adulthood is the world of work. In reality, for many children, this separation represents a tension between the economic needs of the family and an idealised understanding of the rights of the individual child. The presentation of school and work as incompatible often sits uncomfortably with children's own views and experiences. Many children combine school and work quite effectively (Abebe& Bessell 2011, p770).

One particularly troubling consequence of minimum ages is that children's work is *criminalised* (Nieuwenhuys 2007, p149). Since the provisions of the policies require that states institute minimum ages, and enforce them, while school must be compulsory, it follows that, legally, there is no other place outside the home where children younger than the minimum age are allowed to be than in school. For those children who really do need to work for basic needs, this means that they, as workers, are not covered by the same legal protections that their adult counterparts have (see Abebe & Bessell 2011, p768; Nordtveit 2010, p706); Jacquemin 2006, p394).

Jacquemin provides further perspectives on the potential risks of minimum ages in contexts where local perceptions of what is appropriate for children deviates from the norms of international policies. In many cases, neither the girls themselves, nor their surrounding communities (parents /employers etc), embraced the minimum age for employment as domestic servants (2006, p397). One of the interventions in the program run by ICCB [16], which

[16] International Catholic Child Bureau.

Jacquemin's study focused on, was to encourage placement agencies to comply with the minimum age:

> Most employment agencies [...] stopped placing girls under 15, a result the ICCB acclaimed in its annual report 2000: 'Girls under 15 are no longer placed by at least 80 percent of the agencies'. There are the remaining 20 percent of employment agencies that refused to cooperate with ICCB precisely because they do not want to change their lucrative practices [...] The fact that we no longer *see* girls under 15 working as domestics does not necessarily mean that they are no longer there (Jacquemin 2006, p399).

Considering local circumstances in sub-Saharan Africa, the policies may not be effective in 'redirecting' children from work to school based on the included articles. Only legislation in itself will not deter families, communities, employers, or children themselves, from child labour, and prohibiting children from work while forcing them to school may even lead to further hardships, as this section will show.

Problems with formal education in sub-Saharan Africa

Along with the school-promoting agenda follows an assumption that schooling is the most beneficial route towards adulthood, regardless of a child's circumstances. This assumes the existence of a well-functioning educational system where children are adequately prepared with the knowledge and skills they need for adult life in their society, and, needless to say, that the schooling they are offered is devoid of those hazards and harms that are associated with work, and is in fact beneficial to their health, development and so on. However, the analysis of the included articles raises several questions to whether this is really the case for the most economically vulnerable children in sub-Saharan Africa. Here, five challenges will be presented that were identified in the analysis, which shows that the real conditions of the educational systems in this region are perhaps not entirely suitable as an alternative even to hazardous forms of child labour.

First, there are indicators that schools are lacking in *material resources*. Although public schools are officially free, in practice, many of the things needed for the education to happen, such as textbooks, must be purchased by the families or the children themselves (Okyere 2012, p86; Nhenga-Chakarisa 2010, p186; Hilson 2012, p1667). According to Hilson, the educational system in Ghana is "bankrupt" (2008, p1235) and Mali has "one of the poorest educational systems in the world (2012, p1670); in Namibia, School Development Funds are paid for by parents for the upkeep of buildings (Nordtveit 2010, p705); in Nigeria, "parents have to pay for uniforms, writing and reading materials, even desks and chairs" (Okoli & Cree 2012, p68).

Second, there is a shortage of professional *teachers*, often resulting in high student-to-teacher ratios and large classes:

> authorities have indicated that the country requires 75.000 teachers in order to meet the required teacher/pupil ration of 1:35 but currently, the system has only 19,000 teachers […] the situation remains bleak in areas like Talensi-Nabdam, where some schools have one teacher supervising 130 children; in the case of Yamerigo Primary, only three of its nine teachers are trained (Hilson 2008, p1242).[17]

Recruitment of teachers can be particularly challenging in *geographically distant areas*, where inadequate infrastructure also makes it difficult for authorities to manage the organisational aspects of education. For example, inspectors are unable to visit rural schools during rain season when rivers are overflowing (Hilson 2008, p1240); also, children do not have schools within

[17] See also Lubaale (2015): Zambia was prevented from hiring "9,000 desperately needed teachers" (p30) because of the economic restrictions during the SAPs.

commutable distances, adding the cost of transportation to the economic burdens of families (p1243).

These three factors - lack of material resources, low access to educated teachers, and difficulties in organising schooling in inaccessible remote areas - all contribute to a low quality of education at a high cost for families in rural sub-Saharan Africa:

> [C]lassrooms are congested; schools are located vast distances from villages, which discourages children from attending classes; and blackboards, chalk and other essential materials are in short supply […] the backdrop to the failure of the public school system in rural sub-Saharan Africa 'is a fragile state that provides universal but fundamentally underfunded and substandard educational instruction to children' (Bass 2004, quoted in Hilson 2008, p1235).

Furthermore, the *curriculums* are in many authors' views in need of an overhaul (see for example Abebe & Bessell 2011, p773-774) because the content of the education is too far removed from what people perceive as relevant:

> In Benin, most interviewed parents were unable to state a single benefit of formal schooling except that it provided 'knowledge'. The idea of 'knowledge' was often abstract, implying something unclear, but which must be important. A part of the problem is, as noted by one civil servant, 'the low quality of formal education, constant teacher strikes and disconnect between education and work have led to people not seeing the value of school'. Locally, education is seen as having a concrete value only insomuch as it aims are connected to the community (Nordtveit 2010, p707-708) [...] The school, in being a foreign import (and implementing an academic rationalist curriculum with little skills training and work-related information in the three studied countries) appears to bring little utility for the children's future (p710).

Lastly, there are reasons to question whether compulsory formal schooling is *safe* for children. According to Nordtveit, safety concerns, especially for girls, are one of the main barriers to formal education in Benin (2010, p704), and in addition, his article points out some indisputably unacceptable consequences of mandatory schooling. For example, Namibian children engage in prostitution in return for payment of school fees and uniforms (p705), and:

> In Swaziland, police officers warned against the over-emphasis of the benefits of schooling, since some children, believing in the discourse, stop manual daytime labor (e.g., working in the fields, or looking after cattle) and re-enter school. According to an international view of child labor, these children were 'extracted' from child labor and 'reinserted' into schools, This, however, creates a paradox - if the children are not compensated for the opportunity costs of schooling, they still have to revert to labor to make up for these opportunity costs. In some cases they may have taken up nighttime labor, including sex work, to recompense for these costs (Nordtveit 2010, p710).

Without a good understanding of children's circumstances and the nature of the work they are doing, there is a risk that children are 'redirected' from work that is not "particularly hazardous or exploitative" (Nhenga-Chakarisa 2010, p193; Nordtveit 2010, p706), and losing their income can put them in even worse situations.

Is schooling always better than work?

The idea of formal schooling as the only appropriate route for all children, rather than work, is challenged by Nordtveit's results. He argues that "compulsory education has led to undesirable outcomes, especially for the poorest and most vulnerable of the children" (2010, p710). Even for those whose situation is not so dire, considering the high costs and low quality of schools, pursuing a formal education may not be worth the effort (Okyere 2012, p86). Both Nordtveit (2010) and Hilson (2012) discuss parents' sceptical attitude towards schooling:

> Parents in Africa, like parents all over the world, are concerned with two things when it comes to their children: to give them the best they can and to equip them as well as possible to face the future;

> in other words, to educate them… [But] what do parents see when they look at the result of so many years of [schooling] effort? Not only is a diploma increasingly difficult to obtain, but it is no longer a sure way of getting a job (Bonnet 1993, quoted in Hilson 2008, p1238).

However, even if schools were affordable and of good quality, there are doubts as to whether a formal education has value in a largely informal economy (Hilson 2012, p1667). Some statements from the included articles are that school is a "luxury investment" (Nordtveit 2010, p710) and that "education broadens your mind but it does not teach you how to survive" (Hilson 2008, p1238). One illustrative example is the participants in ASM, who come from different backgrounds and are now working in a sector that does not require formal education:

> In the case of ASM, are the many university graduates, retrenched public sector workers and other skilled people now found in camps and elsewhere fully convinced that schooling will facilitate their children securing employment in the formal sector, if it has not done so for them? [...] "In an economic environment where survival depends on work in the informal sector, many parents conclude that taking children out of school and putting them to work is the most sensible solution for survival" (Gootaert & Kanbur 1995, quoted in Hilson 2008, p1238).

Nhenga-Chakarisa criticise international child policy standards for only considering *formal* education and ignoring traditional, *informal* education where work is an important component (2010, p186; see also Hilson 2012, p1666). While the policies view formal education as the only valid source of knowledge (Abebe & Bessell 2011, p769), several of the authors argue that work and informal education may be the best choice for some children (Hilson 2008, p1234; Hilson 2012, p1670; Nhenga-Chakarisa 2010, p187; Abebe & Bessell 2011, p772). Even so, formal education remains important if the circumstances of poor children are to be changed to the better. In Fuseini & Daniel's assessment, "without education, the vicious cycle of poverty will be difficult to eradicate making begging a transmissible 'legacy'" (2018, p9). Indeed, school has a high priority for many of the informants in the included articles:

> Both children and their parents said that good-quality education was of great importance to them. This despite the high costs of education […] Some parents reported that they had arranged and paid for private and expensive out-of-school, extra-mural classes for children to help them pass examinations (Okoli & Cree (2012, p68); It is not necessarily a case of these parents dismissing the importance of a Western-style education altogether […] even in the poorest ASM communities […] there is significant recognition of the importance of a formal education, and that sacrifices are made by most families, including illiterate parents, to improve the lives of their children (Hilson 2012, p1668).

And, the fact that one of the most important motivation for children to work is to afford the costs related to school (Okyere 2012, p83, p86; Abebe & Bessell 2011, p772; Hilson 2012, p1671; Okoli & Cree 2012, p69) cannot be overlooked.

Accessibility of formal education

Based on the analysed articles - perhaps with the exception of Nordtveit's - there is no doubt that African children need and desire a formal education of good quality. However, because of the prevailing circumstances, it is not possible for some families to allow their children to be exclusively occupied in school and not contribute economically to the upkeep of the household: "Evidently, the children who took part in this study require more support than simply being in school if they are to be able to stop working at the artisanal gold mining site" (Okyere 2012, p86). It is clear by the findings of this paper that one of the requirements of the policies, that education must be *free and accessible*, has not been realised for many of the poorest children in sub-Saharan Africa. This questions one of the fundamental assumptions of the policies: rather than being an obstacle to schooling, work is the only way for many children to achieve it. However, it is evident by the included articles that the margins are thin for impoverished

families and that the high costs, as well as the family's need for children's labour, are threatening their schooling:

> [T]he predominant reason for dropout from formal schooling is related to the children's contribution to the family's food security. Hence, a normal response to a question about dropout is that 'my parents told me that I was needed in the field'. In some cases, direct and indirect costs of education may constitute a 'tipping point' which prevents children from attending school (Nordtveit 2010, p708).

Several authors conclude that the most realistic way forward to help make labouring children's lives better is not to exclude them from work, but rather to support them *in* work because the option to stop working does simply not exist (see for example Okoli & Cree 2012, p70). Considering that their work aims to fill basic survival needs, it is not difficult to imagine the potentially very serious consequences if children are prevented from working.

Summary

In Nhenga-Chakarisa's assessment, international child labour policies are "over-estimating the harm of work and neglecting the relevance of poor-quality education" (2010, p185-186) and "condemning all child work and compelling children to go to school without first securing viable alternatives have made them even more vulnerable to poverty" (p185). For school-promoting policies to be favourable for children, the provided education must be of good quality, and the curricular contents must be aligned with the requirements of local economies (Hilson 2008, p1239; Nordtveit, 2010).

Based on the included articles, a labour-free and school-only childhood in sub-Saharan Africa does not appear to be realistic in the foreseeable future. However, if the issues of *accessibility* were to be solved, it is possible that the rest would follow. Lubaale (2015) exemplify how South Africa instituted a *Child Support Grant* in the late 1990's that provided vulnerable households with a modest cash transfer, which led to a significant increase in school enrolment and reduction of child labour (Lubaale 2015, p32). This indicates that children would go to school, and opt out of work, if they could:

> With no one to turn to, children like those who assisted with this study must find their own ways of feeding themselves, sponsoring their education and accessing even some of the basic needs [...] The findings of the study suggests that if they are offered accessible, viable and sustainable alternatives to working in artisanal gold mining, in all likelihood, the children will have no further need to work at the site (Okyere p88).

Section 5: A childhood protected by the family and the state

This concluding section builds upon previously presented findings and emphasises the third research question: *Is a labour-free childhood a universally valid ideal and the appropriate way to ensure 'good childhoods' for children in sub-Saharan Africa?* The focus will be on African childhood conceptualisations, family values, and the protection of children from detrimental effects of labour in the sphere of the family and state-governed institutions. The remaining points of the Ideal Type are:

- A child should not work before the age of 15, and only in safe occupations.
- Light work from the age of 13 is allowed if it does not interfere with school.
- Children younger than 13 may perform light work within a family context.
- From 18 years, childhood is completed, and all forms of work are acceptable.
- States should take preventive action as well as remove and rehabilitate children from harmful labour.

Age and childhood constructs

As previously stated, the developmental stages of childhood that Western scholars have sketched out (see *Background*), and the idea that childhood should be protected and care-free, are assumed to be globally universal and applicable to all children of the world. In these findings, some African childhood notions have been detected that questions the validity of this paradigm, which will be addressed here.

Nhenga-Chakarisa (2010) provide a comprehensive review of different notions of childhood and point out some problematic traits of Western childhood constructs:

> Today, the significance of childhood is well pronounced in modern societies which perceive it as a period of extended economic dependence, protected innocence and weakness, and rapid learning which is achieved through universal schooling. During this time, the child is largely separated from economic and community life [...] *This notion of childhood is historically and anthropologically unusual*, not only for the radical division it draws between childhood and adulthood, but also for valuing children's helplessness rather than usefulness. It extends their dependency to an advanced age by deliberately delaying instruction in certain life skills, notably, the making of a living or the raising of a family (Nhenga-Chakarisa 2010, p173; my emphasis).

The present analysis identifies two central notions in the child labour policies that are at odds with how people in sub-Saharan Africa traditionally view childhood: first, work is not a bad thing for children but rather beneficial to their development; second, the age limits, that are remarkably specific in the policies, have low relevance for African cultures. Since it was first presented in the *Minimum Age Convention*, the age of 15 appears to have been cemented as a definite dividing point and the earliest appropriate age for full-time work[18]; however, the idea that children under 15 should not work "is in conflict with the traditional processes of child socialisation" (Fuseini & Daniel 2018, p10) in African societies. The internal logic of specific age limits for different kinds of work is also criticised by some authors:

> It is often surmised that a child should attend school until the day he or she reaches a specific age [...] after which he or she is eligible for work, which at that point ceases to be the negatively loaded child labor (or in certain cases, the worst forms of child labor), and becomes the positively loaded 'work' [...] The one-dimensional way of understanding childhood (i.e., as if there is a clear and sudden demarcation between the end of childhood and the commencement of adulthood) is largely reflected by international conventions (Nordtveit 2010, p703).

According to Nordtveit's assessment, a child's exact biological age is not commonly known in the three countries where his study is conducted, and people use other markers for the end of childhood, e.g., marriage: "Talking about the age of 15 or 18 as having specific significance in this cultural context, obviously, would be very arbitrary" (Nordtveit 2010, p707).

Nhenga-Chakarisa (2010) provides an in-depth discussion on this issue, with her article illustratively titled *Who does the law seek to protect and from what?* She argues:

> While states have displayed an obvious consensus of concern for children, there is nevertheless disagreement on the conception of childhood, the period of growth that should be protected, and the laws and policies needed to bring about an improvement in child welfare, particularly those designed to tackle child labour (Nhenga-Chakarisa 2010, p167).

[18] Notably, only *safe* work, until the age of 18: implying that after the 18th birthday, an individual's resistance to dangerous, harmful work has matured and they can engage in such occupations without risk for their health, development etc.

The issue becomes even more complicated if children's own opinions are taken into account: if children themselves wish to be included in work that professional 'child experts' condemns as being detrimental child labour, "which of them is to be ignored?" (Fuseini & Daniel 2018, p11).

As noted above, the strict separation of childhood and adulthood found in Western societies, where work is reserved for adults only, appears to be alien to African cultures. For a more culture-appropriate approach on child labour issues in sub-Saharan Africa, Nordtveit suggests that "it may be useful to consider childhood as continuous with adulthood, and that the change from education to work is not an abrupt, age-determined shift, but a smooth transition" (2010, p710).

Kinship solidarity, children's duties, and exploitation in domestic settings

Another feature of international policies that does not fit well with African cultures is the pronounced ideals of *individualism* (Nhenga-Chakarisa 2010, p168), while African societies are rather "characterised by *collectivist* or inter-dependent cultural scripts which stress the importance of kinship [...] each person is expected to compromise personal interests for the good of the community. From infancy, this sense of sacrifice is instilled in everyone" (p169, my emphasis; see also Nordtveit 2010, p708; Lubaale 2015, p25). This has implications for children's protection from harmful labour:

> Although a high premium is placed on children, it is elders who hold most respect in society […] the low status accorded to children is essentially an age-based social stratification, which places them in a secondary and disadvantaged position and reinforces their vulnerability (Okoli & Cree 2012, p61).

Considering that "children occupy the lowest position within the hierarchy" (Lubaale 2015, p25), it is questionable whether they would be able to speak up for themselves and refuse to perform work that they feel is too burdensome or dangerous, especially when adult members of their families sanction such work on the basis that children have a *duty* to contribute to the household: "For many African societies, the phenomenon of exploitative labour is non-existent to adults" (Lubaale 2015, p26). There is a risk, therefore, addressed by *all* included articles, that the deeply embedded kinship solidarity principle may lead to situations that should be considered objectively exploitative for children, but that are largely accepted both by parents, their community, and the children themselves (see Nordtveit 2010, p707; Nhenga-Chakarisa 2010, p175; Okoli & Cree 2012, p69; Robson 2004, p235-236; Jacquemin 2006).

In their writing, the child labour policies appear to rule out that children will be assigned harmful work or be exploited by their own parents. However, these findings have shown that begging and street vending, two forms of work that are both described as rather unpleasant, are often initiated by parents (Fuseini & Daniel 2018; Okoli & Cree 2012); in palliative care and domestic work, there is a high risk for exploitation (Robson 2004; Jacquemin 2006); and in ASM, although children may feel that they make their own, autonomous choices regarding their work, Okyere asks to what extent they really are able to "make decisions about their own lives" (2012, p88) and Hilson's findings show that girls in particular are very vulnerable indeed to be deprived of an education and referred to domestic work (2012, p1671-1672). This is a weakness of the child labour policies, identified by several authors: since the home is assumed to be a safe space for children, there are not adequate provisions in them to protect children from detrimental work within domestic settings (see Abebe & Bessell 2011, p772; Lubaale 2015).

However, even in cases where children's right to protection from harmful work is violated by family members, there are also positive outcomes of such work, and, importantly: these practices, exploitative as they may be, have meaning in their sociocultural context. Most prominent in this analysis is the significance of *family cohesion* which is presented as central

to African cultural identity by several authors. The fact that African children are invited to be active participants in the upkeep of the family creates a tension in relation to Western childhood discourse, which does not imagine children as anything other than *receivers* of care (Robson 2004) by adults who are expected to provide them with everything they need (see the quote *Childhood defined,* above: UNICEF 2021b). However, according to Fuseini & Daniel (2018), even an activity as stigmatised as begging helps to build children's confidence and self-reliance, gives them a sense of pride and significance as they contribute to the household's needs, and it is a way for them to negotiate "their position in the family hierarchy" as it "gives them responsibility and status within the family" (p9). Were these children to be liberated from begging, the authors insist that they must be offered alternative ways to obtain these benefits (Fuseini & Daniel 2018). The informant children of the included articles are all very well aware that the monetary wage, or other material or immaterial gaining that their work provide, is essential for their immediate household (see for example Hilson 2008, p1235; Okoli & Cree p66) and it should be plausible that children's confidence can grow from such experiences. Nhenga-Chakarisa's argument, that work can "bring important rewards, such as teaching children endurance, giving them a sense of pride and self-worth, and making self-sufficiency possible [...] and other capacities needed to live successfully within a social context" (2010, p188) should not be dismissed:

> [T]here are cultural practices, which, by today's standards, are difficult to justify [...] [this] however, seem to have driven the international campaign against child labour to seek the denial of all cultural practices and attitudes. Notable amongst these are the expectation that children will contribute economically to their families, and the belief that children working is an appropriate preparation for adulthood. While such African attitudes can indeed significantly perpetuate child labour, they cannot, with their associated practices, be entirely condemned (Nhenga-Chakarisa 2010, p188-189).

Careless parents, failing states, and bad culture?

According to some authors, in the dominating discourse of protected, care-free childhoods, parents who allow their children to perform detrimental labour are viewed to be 'irresponsible' (Hilson 2008, p1242) or 'careless' (Hilson 2012, p1666), and when poor countries do not achieve a labour-free childhood it is because of "the moral failing of their societies" (Bachman 2006, quoted in Nhenga-Chakarisa 2010, p185). However, with the colonial, political and economic history in mind: is it really reasonable that "an idealised vision of childhood [is] extended from a relatively small group determined by geography, gender and class to an experience that should be shared by all children?" (Abebe & Bessell 2011, p766-767). Nieuwenhuys (2007) provides an important perspective:

> Nowhere does [international child rights policies prescribe] a principle of solidarity with less fortunate children. From now on enterprising parents earning money to spend on their children's good quality food, education, health, housing and recreation, in other words, on the realization of their children's rights, were to be set as examples. The failure to realize rights became a 'failure of parental altruism' and put on the account of poor parents' lack of initiative, ignorance, laziness, insensibility or, worse, religious and political fanaticism. A failure to offer constant care and supervision, to buy private education, to provide children with expensive medicines, vitamin-rich food, electronic toys and mobile phones and so on, was no longer the outcome of some structural injustice in the global system of distribution. Ruling elites could unfurl the familiar interpretation of poverty as resulting from the vicious circle of high fertility, early labour and ignorance [...] and offer no more than support to empower people to 'help themselves' (Nieuwenhuys 2007, p158).

Some authors think that "developed countries, with their superior political and economic power, unjustly dominate the international discourse on child labor" (Hilson 2008, p1235), leading to "developing countries which had tended to regard child labour as necessary are now being forced to view it as only harmful" (Nhenga-Chakarisa 2010, p192).

A closer look at how child labour-abolishing policies are received and implemented suggests that there is a certain ambivalence amongst government authorities in Africa. Several authors note that although domestic legislation does restrict children's involvement in the type of work studied (Okoli & Cree 2012; Fuseini & Daniel 2018; Hilson 2008) or that is not 'officially' considered appropriate (Robson 2004, p237-238), it does not mean "that such well-meaning laws are accepted or adhered to" (Haider 2008, quoted in Abebe & Bessell 2011, p768). A legitimate question on this regard is why African nations have signed and ratified the child labour conventions in the first place. According to Nhenga-Chakarisa,

> it is well known that the motivation for the ratification is always a combination of various factors, with international diplomacy being a primary consideration [...] While some have ratified human rights treaties with the genuine intention to establish a universal normative framework [...] there is also evidence that developing countries simply succumbed to political pressure to ratify from other states and international non-governmental organisations (Nhenga-Chakarisa 2010, p190).

And, for example, despite UNICEF's claims that the UNCRC is a 'consensus document' that encompasses all cultures of the world (see *Background*), representatives from developing countries "are usually late participants in a predetermined process" (Nhenga-Chakarisa 2010, p190-191) when such documents are drafted. It is interesting to note that African nations have adopted their own child rights document, the *African Charter on the Rights and Welfare of the Child*: "Scolars contend that the instrument was born out of the feeling by African member-states that [the UNCRC] missed important socio-cultural and economic realities of the African experience" (p165). Its content is largely aligning with the UNCRC: however, one prominent difference is that children are expressively given *responsibilities* towards their families and community (Nhenga-Chakarisa 2010, p166).

Summary

This section has elaborated on African childhood conceptualisations and examined the capacity of African parents and societies to achieve protected, labour-free childhoods. As predicted in the introductory sections of the present paper, this study has identified some discrepancies between African and Western childhood notions that dispute the 'universalism' of the child labour 'abolition agenda' and confirms the concern of Smith (2015) and White (1999) that non-Western experiences of childhood are stigmatised in the dominating Western discourse (see *Comments and critisisms on the child labour policies* above). Based on the included articles, African childhood is not to the same extent as in the West viewed as a separate, discrete period of life with distinct developmental stages indicated by specific age limits, but rather *continuous with adulthood*; the Western notion of childhood being a privileged, care-free existence does not align with African children being assigned certain *responsibilities*, and having a duty to help their families whenever needed; and the idea that *states* should be responsible for implementing and enforcing child labour abolition laws is questionable, considering the fragile economies of national governments in sub-Saharan Africa and their heritage in the aftermath of colonisation.

DISCUSSION

This paper set out to explore to what extent international child labour policies are culturally universal and appropriate for arranging 'good childhoods' for children in sub-Saharan Africa, guided by the *Child Labour Ideal Type* laid out above. The findings have addressed the first research question, *how do the authors depict the child labour phenomenon in sub-Saharan Africa?,* and showed that working children in this region are indeed exposed to detrimental effects by their work, in alignment with the Ideal Type. However, their work also generates income or other material gains and benefits them in many ways. The predominant consensus of the included articles is that ending these children's involvement in work is not a realistic solution, as argued by Okyere (2012):

> Their inability to attend school, stay at home, rest, play and essentially 'enjoy' being children was not because they worked at an artisanal gold mining site. Instead, they were not able to access the rights guaranteed them by the UNCRC and Ghana's own 1998 Children's Act because they had been let down by those tasked with providing them with these (Okyere 2012, p87).

Regarding the second question, *are international policy instruments relevant for understanding and addressing the child labour issue in sub-Saharan Africa?,* the policy instruments have been found to have limited usefulness in the African context. The paper has shown that, despite the fact that almost all African states are signatories to the documents, their implementation has not been successful. The analysis suggests that the high prevalence of child labour in the sub-Saharan region can to a large part be explained by the difficult political and economic situation and severely underfunded welfare systems: there are simply not enough resources to realise the labour-abolishing agenda. Lastly, the question of whether *a labour-free childhood is a universally valid ideal and the appropriate way to ensure 'good childhoods' for children in sub-Saharan Africa* has been answered in the negative. The most important finding is that work during childhood is appreciated as something positive, and children taking an active part and supporting their families economically is a central and valued part of African culture.

The challenge of universal child rights

This exploration of the ideological contents of child labour policies has, as the paper intended, succeeded in identifying some aspects of international childhood discourse that are not culturally universal, because in the context of sub-Saharan Africa, some significant discrepancies have been found. The postcolonial-inspired approach, guided by Canella & Viruru's (2004) suggestion to "examine authority, power, knowledge and even the will to understand" (quoted above; 2004, p63) has been helpful in this regard as it has provided a deepened understanding of Africa's position in the global community. This paper suggests that sub-Saharan nation states are lacking the economic conditions that are required to implement these policies, but it also seems they may not have any real political or cultural motivation to realise a labour-free childhood. Their signing of the policies may be interpreted as an expression of Western cultural hegemony: that the notions of labour-free childhoods are forced upon them by their former colonisers, while important African cultural values and childhood practices are condemned as detrimental to children. The fact that African nations have adopted their own, region-specific child rights convention supports this argument, as it implicates that the traditional values of kinship solidarity, family cohesion and children's duties, which are incorporated in the ACRWC, are so important for Africans that they had to be defended and formalised in policy.

Two major obstacles in the implementation of child labour policies in sub-Saharan Africa have emerged in the present study: *poverty and the capacity of the states*, and *the dilemma of culture*. As for the first, the assessment of this paper is that children function as a *labour reserve*

within the kinship solidarity system, one that adults can put into use based on need. Considering the economic reality of the poorest, where children's work provides basic material needs for themselves and their families, it is questionable whether policy provisions that aims to end children's involvement in work really will create better childhoods in sub-Saharan Africa. The idea that child labour will diminish with economic development and alleviated poverty may be correct, but based on the present study, it lies beyond the ability of individual states to implement real changes towards this goal. The major challenge here is the lack of economic resources, both for individual households and families, as well as on a community- and state level. For the time being, *poor households* need children's work to survive, and *poor nations* benefit from, and in fact rely on, unpaid work performed by women and children, as the findings have shown.

The dilemma of culture is excellently summarised by Nhenga-Chakarisa (2010):

> The difference between the ideologies that informed human rights treaties and those of African cultures raise serious concerns. Can international human rights instruments, given the preconceptions of their drafters, apply effectively to peoples from different cultures? Can the latter peoples identify with the notions of child labour contained in the international instruments? If some cultures do not possess the conceptions of children's rights as enshrined in international instruments, should their customs and norms on child development be dismissed as bad? (Nhenga-Chakarisa 2010, p188)

Thus, the present paper claims that the universalism of the labour-free childhood ideal has been disproved, which opens up for an extensive discussion of the underlying tenets of international child discourse and globally universal 'standards' or, indeed, human rights overall. If the care-free childhood norm of Western discourse is not culturally valid in non-Western sociocultural contexts, child experts need to reconsider what constitutes 'good childhoods' – in plural - and how they can be arranged.

Conclusion

This paper has aimed to gain a wider understanding of what a 'good childhood' might entail and, inspired by postcolonial critique, try to not be limited by Western-defined assumptions about what is in a child's best interest. The challenge for this author - and perhaps the reader - has been to consider the possibility that labour during childhood is not necessarily detrimental for the child to such an extent that its 'ends' childhood, and instead imagine a 'good childhood' in which labour is present. The paper has shown that labour that is harmful for children is undoubtedly happening in the sub-Saharan region and that efforts are needed to assist working children and improve their quality of life. However, the implementation of international child labour policy in Africa has, so far, not had the desired outcome: that children are redirected from work to school. Based on the findings of the literature review, the reason why the child labour situation in sub-Saharan Africa has been so intractable may be in the policies themselves: they are not aligned with the realities of African children, and therefore not capable to solve their problems. In the global pursuit of a 'good childhood' for each individual child in the world, one needs to consider "the enormous diversity of children's lives and problems" and that "static and universalizing models of childhood" (White 1999, p134) are not helpful to tackle problems that fall outside the realities that such models are capable to imagine. Therefore, this paper proposes that the international child welfare community looks critically at prevailing assumptions about what children need adults to do for them, and that African perspectives, wisdoms and knowledges about children are considered, and added, into the discourse.

Methodological discussion

Limitations

It must be stressed that the systematic methodology has been modified to be suitable for a student paper: it is a *rapid review* which is "deliberately limited in scope" (Bryman 2016, p102), importantly, by restraining the search to easily accessed resources. A richer data material could possibly be retrieved with a more effective search strategy, better calibrated keywords etc. For example, in the reading and analysis, it was noted by the author that several articles were referring to other studies that would probably meet all the inclusion criteria for the present study, but they did not appear in the search result at the chosen search engine. This indicates that the search on *Supersök* did not in fact cover all available resources: therefore, relevant data were probably missed. However, in the twelve included articles, the findings did almost reach saturation: apart from Lubaale (2015), all authors are in consensus about the low validity of international child labour policies in sub-Saharan Africa; and Lubaale, notably, is very clear that her discussion relates only to child *labour* which is detrimental, hazardous, exploitative and so on - that is, work that could be considered 'light' and appropriate for children is beyond her scope.

Bias and objectivity

By restricting the scope to peer reviewed articles, the paper has accepted a heavy *publication bias*. In addition, the issue of objectivity and *researcher bias* is by no means solved by the chosen approach. According to Bryman, the role of the researcher in social sciences can never really be neutralised, because their "values intrude in all phases of the research process - from the choice of a research area to the formulation of conclusions" (2016, p141). This paper takes support from the concept of 'conscious partiality':

> Particularly amongst feminist researchers, to do research on women in an objective, value-neutral way would be undesirable (as well as being difficult to achieve), because it would be incompatible with the values of feminism. Instead, many feminist researchers advocate a stance that extols the virtues of a commitment to women and exposing the conditions of their disadvantage in a male-dominated society (Bryman 2016, p141).

Regarding the present topic, a clear parallel exists to the conscious stance that is taken within the postcolonial research tradition (see Canella & Viruru, 2004). Therefore, this author feels comfortable to 'take sides' (Bryman 2016, p141) and target the Western-dominant global childhood discourse with sharp critique, in the hope that the paper's contribution might help form better child rights policies in the future that are embracing valuable traits of African childhood discourses that, so far, has been disregarded.

Further research

The results of this paper points to some subjects that invites further investigation. The issue of child labour has only been scratched on the surface, and for the researcher that wishes to dive deeper, there are several directions one could take.

As mentioned in *Analysis and narrative presentation*, one theme relating to issues of *health; the AIDS/ HIV-epidemic; demographics;* and *orphanhood /child-headed households* was excluded from the scope of this paper. It was apparent for the author that this theme has such significant importance that it would not have been given justice within the limitations of this paper – it would be worthy of its own study. Using the concept of *dependency ratio*, one could ask: at what point does it become unreasonable to put the entire burden of work onto the adult population, and expect the realisation of 'care-free childhoods' for minors (and retirement for elders)? In particular, a focus on *child-headed households* would illuminate the ideal of

childhood as a protected, innocent period of life with no 'real responsibilities' - how could this possibly be realised for orphans, and by whom? For a further discussion on these issues, see Robson (2004), Hilson (2008, 2012) and Abebe & Bessell (2011).

Another suggestion is to look at the topics that were pruned in the systematic relevance assessment (see Appendix A). For example: considering the impact of global allocation of production in search for cheaper labour - one factor that is evidently pushing for child labour in Africa (Lubaale 2015) - it would be interesting to pick up the *business ethics* category for scrutiny: perhaps a suitable topic for economical sciences to investigate. The issue of *trafficking* is mentioned by Jaqcuemin (2006) and Nordtveit (2010) and in several of the excluded articles and should be a potent topic for a study in the sub-Saharan sociocultural context, where the 'child-relocation' fostering practice is widespread. Is it possible that Westerners are misinterpreting a necessary survival strategy for poor families as child exploitation? And if children are suffering in these arrangements, what kinds of interventions would be effective in protecting them? *Child marriage* is another topic that may benefit from a critical analysis, departing from diverse cultural conceptualisations of childhood, adulthood and age (see Nhenga-Chakarisa 2010; Nordtveit 2010).

Most importantly, however, this author insists that the underlying assumption of the child labour discourse – that children must be protected from work in order to achieve a beneficial development towards adulthood – is flawed, and that *further ideological analysis of the Western-oriented child discourse is needed*. Do modern Westerners really hold the correct answer to how a child should be best prepared for adulthood? Nhenga-Chakarisa (2010) has a very interesting point:

> The problem with the contemporary ideal of childhood is that it denies children's agency in work, yet CRC itself and the African Children's Charter both recognise childhood not only as a period of protection, but also as one where the agency of the child is upheld. Moreover, doubt may be thrown on the developmental and moral validity of a model of childhood, which excludes children from participation in matters that are social and economic. What is the value of isolating and institutionalising children in schools buffered from the important realities of life? The rationale of CRC, however, is that, irrespective of the level of development of a country, children must have a childhood of dependency during which they are empowered with rights […] (Nhenga-Chakarisa 2010, p177).

Lastly, as it is promoted as a 'solution' to child labour, a natural continuation of this study is to focus on *education* and how it can be achieved for the most vulnerable children in sub-Saharan Africa, as well as in other parts of the world. The five challenges identified in the findings (see *Problems with formal education in sub-Saharan Africa*): material resources; educated teachers; infrastructure/ geographical distance; curriculums; and safety; are all potent subjects for further studies. There is also the question of informal education, and whether it may be a more appropriate choice for some children, as several authors have argued. It can be assumed that the international child welfare community is in agreement that children have a right to an education, but perhaps we should ask ourselves what this right entails. Exactly how, and what, should children be educated?

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Robson, E. (2004) Hidden Child Workers: Young Carers in Zimbabwe. *Antipode*, p227-248.

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Appendix A: Assessment of relevance

Initial result from searches A, B, C, D, E and F:

127 articles

Relevance assessment 1, based on meta-information /titles:

	A	B	C	D	E	F	Sum
Search result	78	34	5	1	8	1	127
Excluding:							
doublets	0	9	2	1	4	1	17
Not peer reviewed	4						4
Portugese	1						1
prior to 1999	2	1					3
Not Africa	13	1	2		3		19
Health	1						1
Trafficking	5	3					8
Slavery	2						2
child soldiers	3	1					4
poverty	1	1					2
street children		1					1
Marriage, gender, sexual abuse	1	2					3
Early childhood care	2						2
quantitative measurements	3	2					5
general, adults, human rights	13	6	1				20
business ethics	11				1		12
Sum:	62	27	5	1	8	1	104
Remaining:	16	7	0	0	0	0	23

Remaining:	Excluded:
23	-104

Relevance assessment 2, abstracts and full text:

Remaining	Excluded	Addition of Nieuwenhuys (2007)
11	-12	+1

Final selection

12 articles

Appendix B: final selection of articles

Overview articles (4)

Abebe, T; Bessell, S. (2011) Dominant Discourses, Debates and Silences on Child Labour in Africa and Asia. *Third World Quarterly*, Vol32(4) p765-786.

Lubaale, E.C. (2015) The recognition of the right of children to freedom from child labour in Africa: is it enough? *Africa Focus*, vol 28(1), p23-43.

Nhenga-Chakarisa, T.C. (2010) Who does the law seek to protect and from what? The application of international law on child labour in an African context. *Human Rights Law Journal,* vol 10(1), p161-196.

Nieuwenhuys, O. (2007) Embedding the Global Womb: Global Cild Labour and the New Policy Agenda. *Children's Geographies*, vol 5(1-2), p149-163.

Original investigations (8)

Fuseini, T; Daniel, M. (2018) Exploring the stressors and resources of Muslim child beggars in Dagbon of Northern Ghana in the context of child rights and existing realities. *Cogent Social Sciences,* 4: 1542955

Hilson, G. (2008) 'A load too heavy': Critical reflections on the child labor problem in Africa's small-scale mining sector. *Children and Youth Services Review*, Vol30, p1233-1245.

Hilson, G. (2012) Family Hardship and Cultural Values: Child Labor in Malian Small-Scale Gold Mining Communities. *World Development*, Vol40(8), p1663-1674.

Jaquemin, Mélanie (2006) Can the language of rights get hold of the compex realities of child domestic work? The case of young domestic workers in Abidjan, Ivory Coast. *Childhood*, vol 13(3), p389-406.

Nordtveit, B.H. (2010) Discourses of education, protection, and child labor: case studies of Benin, Namibia and Swaziland. *Discourse: Studies in the Cultural Politics of Education*, vol 13(5) p699-712.

Okoli, R.C.B; Cree, V.E. (2012) Children's work: Experiences of Street-Vending Children and Young People in Enugu, Nigeria. *British Journal of Social Work*, vol 42, p58-73

Okyere, S. (2012) Are working children's rights and child labour abolition complementary or opposing realms? *International Social Work*, vol 56(1), p 80-91.

Robson, E. (2004) Hidden Child Workers: Young Carers in Zimbabwe. *Antipode*, p227-248.

Appendix C: Table of included articles: methods, participants etc

Author	Publ.	Journal	Type of work	Place
Abebe & Bessell	2011	Third World Quarterly	Overview article	
Lubaale	2015	Africa Focus	Overview article	
Nhenga-Chakarisa	2010	Human Rights Law Journal	Overview article	
Nieuwenhuys	2007	Children's Geographies	Overview article	
Fuseini & Daniel	2018	Cogent Social Sciences	Begging	Norhtern rural Ghana
Hilson	2008	Children and Youth Services Review	ASM	Eastern rural Ghana
Hilson	2012	World Development	ASM	Komana West, Mali
Jacquemin	2006	Childhood	Domestic work	Abidjan, capital of Ivory Coast
Nordtveit	2010	Discourse: Studies in the Cultural Politics of Education	Misc.	Benin /Namibia /Swaziland
Okoli & Cree	2012	British Journal of Social Work	Street vending	Enugu, Nigeria
Okyere	2012	International Social Work	ASM	Ghana
Robson	2004	Antipode	Palliative care	Zimbabwe

Author	Data collection	Method	Participants
Fuseini & Daniel	2015	Interviews, 'draw and tell'	8 muslim boys age 10-14
Hilson	2006-2007	Interviews	Adults /stakcholders in Operation Sunlight
Hilson	>2012	Interviews	45 parents, 30 children
Jacquemin	1999-2001	Socioanthropological /interviews/ observations	152 domestic workers, parents,employers, social workers etc
Nordtveit	2006-2008	Interviews, group discussions	Children, parents, employers, social workers
Okoli & Cree	>2009	Participant observation, interviews	64 children age 6-17, adult vendors; 24 in-depth interviews
Okyere	>2012	Ethnography /observations /interviews	54 children age 14-17, adult miners, parents, community leaders
Robson	1997	Interviews	9 young carers, 9 caring professionals (eg social workers)

Appendix D: Grid guide for analysis

	What are the traditional African conceptualisations of work during childhood?	Why are children in sub-Saharan Africa engaging in work and not in formal education?	How are African children affected by schooling and working respectively?	What have been the outcomes of international labour-free childhood policies in sub-Saharan Africa?	Are international child labour policies useful for achieving better childhoods in sub-Saharan Africa?
Development; health; age; concept of childhood					
Education					
Poverty; economic necessity; livelihood; survival					
Exploitation; inequality; power relationships					
Local community; culture; governments; politics					
Family; home; women					