

THE FREEDOM FUND



HIDDEN IN PLAIN SIGHT

Shining a light on the experiences of
child domestic workers in Kenya

Research summary report

July 2023

A study led by the African Institute for Children Studies and commissioned by the Freedom Fund.
This research summary report is authored by Helen Shipman.

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All illustrations in this report are by George Ochuka from a workshop during the launch event for the Freedom Fund's hotspot program in Kenya.

LIST OF ACRONYMS

AICS	African Institute of Children Studies
CBO	Community-based organisation
CDW	Child domestic worker
FBO	Faith-based organisation
FGD	Focus group discussion
ILO	International Labour Organization
MoLSP	Ministry of Labour and Social Protection
NGO	Non-governmental organisation
NHIF	National Hospital Insurance Fund
NSSF	National Social Security Fund

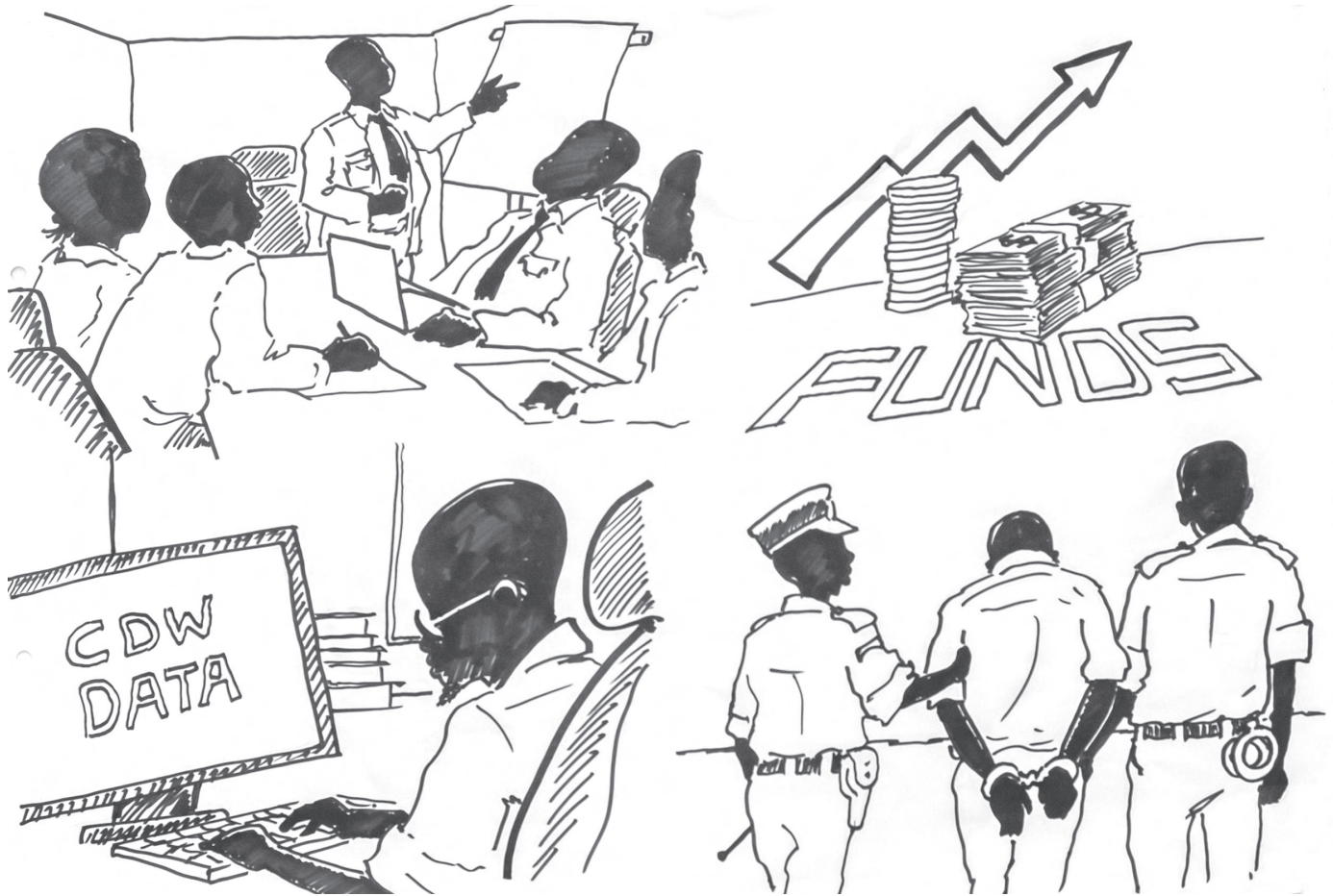
EXECUTIVE SUMMARY

The Government of Kenya has demonstrated a strong commitment to addressing hazardous child labour through policy and legislative changes¹. Nonetheless, many children still find themselves in exploitative work that curtails their basic rights and constitutes modern slavery². This report focuses on one specific form of child labour – child domestic work – which is estimated to be the second largest contributor to working children in Kenya^{3,4}. The informality of children in domestic work means it is often overlooked, framed as a ‘safe’ way for children to earn money and gain skills since it occurs in a ‘family setting’⁵. Yet, like other forms of child labour, it can be exploitative, harming children’s well-being and long-term development⁶.

Now is an opportune time to revisit the risks associated with child domestic work; the determinantal economic effects of covid-19, coupled with yet another severe drought, have left economically vulnerable children at increased risk of entering exploitative domestic work. Furthermore, opportunities exist to strengthen and clarify the policy framework for addressing harmful child domestic work, such as the on-going development of implementation guidance for the new Children Act (2022). Against this backdrop, this report outlines the findings of a study commissioned by the Freedom Fund that aims to shed light on the experiences of child domestic workers (CDWs) in Kenya and provide evidence for the Freedom Fund’s new Kenya hotspot programming. The study used a mixed methods approach, including a survey for 406 CDWs (295 female and 111 male), focus group discussions (FGDs) with 103 CDWs (94 females and 9 males) and 40 key stakeholders, as well as interviews with 20 caregivers and 12 employers of CDWs. Data collection covered nine counties, including urban, rural and border counties⁷.

The study found that children typically migrate from rural areas or neighbouring countries to urban centres to engage in domestic work. In contravention of the Employment Act (2007), participants in the study reported children as young as seven are employed in domestic work. Although not all the consulted CDWs reported experiencing exploitative work conditions, most did. This included being on call 24 hours a day, having fewer than three meals a day, being physically and emotionally abused, and having little or no access to their salaries, which were typically paid to their caregivers. Since caregivers take advances on CDWs’ salaries, CDWs can be locked in bonded labour, working to pay off their caregivers’ debt. The study found that poverty is the predominant factor pushing children into domestic work. Caregivers send children from economically vulnerable households to engage in domestic work in order to contribute to the household income. Participants reported that work placements are found through either informal networks (family and friends) or brokers who place CDWs with third-party employers. Trust-based community structures play a critical role in placing children in domestic work.

The current national legal and policy framework has been notably strengthened to protect the rights of child workers. Nonetheless, study participants identified various ways in which the framework could be further enhanced to specifically protect CDWs. These include strengthening and resolving possible contradictions between education and employment policies and providing clear guidance on what constitutes illegal child domestic work. The latter is needed to prevent child domestic work being constructed as “helping” or “chores”, a normative lens that hides exploitative work conditions. The study also found that when there are state and non-state actors providing services to children in domestic work to prevent or respond to exploitation and abuse, more targeted support is needed, particularly in terms of monitoring CDWs’ “private” work conditions. There are also opportunities to strengthen community-based protection mechanisms by building on the Nyumba Kumi initiative⁸, for instance. The report ends by providing recommendations for strengthening policy and legislation supporting the rights of CDWs, and enhancing prevention, detection, and response mechanisms. These recommendations will form the basis of the Freedom Fund’s new Kenya hotspot program.



INTRODUCTION

Globally, around one in ten children engage in child labour⁹. For some, work provides an opportunity to learn new skills alongside their education and social activities. However, others are forced into hazardous work that curtails their basic rights and constitutes a form of modern slavery¹⁰. Duty bearers, such as states and caregivers, must therefore provide adequate safeguards to ensure children can enjoy the potential benefits of work, should they so wish, while being protected from exploitation.

The Kenyan government has helpfully introduced policies to address child labour and child trafficking, trusting enforcement to the Ministry of Labour and Social Protection (MoLSP), the National Police Service, and the Office of the Director of Public Prosecutions. Activities to eliminate child labour and ensure country-wide implementation of child protection activities lie with the Child Labour Division. Nevertheless, child labour remains a pertinent concern. Kenya National Bureau of Statistics statistics show that 8.5% of children are engaged in child labour, with arid and semi-arid lands registering child labour rates of up to 30%¹¹. Critically, though, the often-hidden nature of exploitation, coupled with limited, recent large-scale surveys on child labour in Kenya¹², means that the prevalence of *hazardous work*¹³ remains unknown.

This report focuses on one specific form of child labour – child domestic work – which is estimated to be the second largest contributor to working children in Kenya¹⁴ after the agriculture sector¹⁵. Although data is scarce, a 2015 study by IDAY-Kenya and PALM identified 350,000 CDWs in Kenya¹⁶. Child domestic work poses specific challenges for policy makers and child protection actors since it occurs in private and is often perceived to be a safe, culturally acceptable means through which children can work¹⁷. Nonetheless, as highlighted within this report, it is often exploitative and harmful to children’s well-being and long-term development¹⁸ – a form of modern slavery. The report therefore aims to increase visibility of CDWs in Kenya, to enrich understanding of their different realities and to suggest

ways of further strengthening policy and programming that protects vulnerable CDWs. The findings will be used to inform the Freedom Fund's current and future programming in Kenya.

WHY IS NOW A GOOD TIME TO FOCUS ON THE EXPLOITATION OF CHILD DOMESTIC WORKERS?

Although concern about the exploitation of CDWs is not new, now is an opportune time to re-focus our efforts on tackling this issue. As the country recovers from the negative economic impact of covid-19, while simultaneously facing one of the worst droughts in 40 years¹⁹, Kenyans face precarious economic times. These conditions increase the risk of children being forced to enter employment, such as child domestic work, to bolster household incomes²⁰. The research described in the report also identifies a recent, perceived increase in the use of commercial recruitment brokers who place CDWs with strangers rather than friends or relatives. Although the latter can also be exploitative, the study found that CDWs placed with strangers were more likely to report inhumane work conditions; this issue therefore requires timely attention. Finally, the findings from our research matched previous studies on CDWs, showing little evidence of significant change as a result of existing interventions²¹. Thus, there is a pressing need for new approaches to prevent and mitigate the rights violations experienced by many CDWs, while simultaneously exploring ways to safeguard children who wish to enter domestic work that is appropriate for their age, physical, psychological and social development.

There are also current opportunities to support our efforts to address exploitation of CDWs. In 2023, the Children Act (2022) guidance is being finalised, representing a chance to clarify exactly what constitutes hazardous forms of child domestic work and to include sensitisation on this issue in future policy dissemination. Furthermore, the government has emphasised a commitment to supporting youth employment initiatives to increase the country's economic growth and development²². As the informal sector represents a significant source of potential employment for youth, now is an opportune time to better understand the positive and negative experiences of CDWs and improve safeguards, as needed.

INTRODUCING THE FREEDOM FUND'S KENYA HOTSPOT

Against this backdrop, the Freedom Fund has decided to start programming in Kenya. The Freedom Fund is a global fund with the sole aim of helping end modern slavery. We are a catalyst in the global effort to end modern slavery, working in the countries and sectors where it is most prevalent. We invest in and partner with organisations and communities on the frontlines of ending slavery and exploitation.

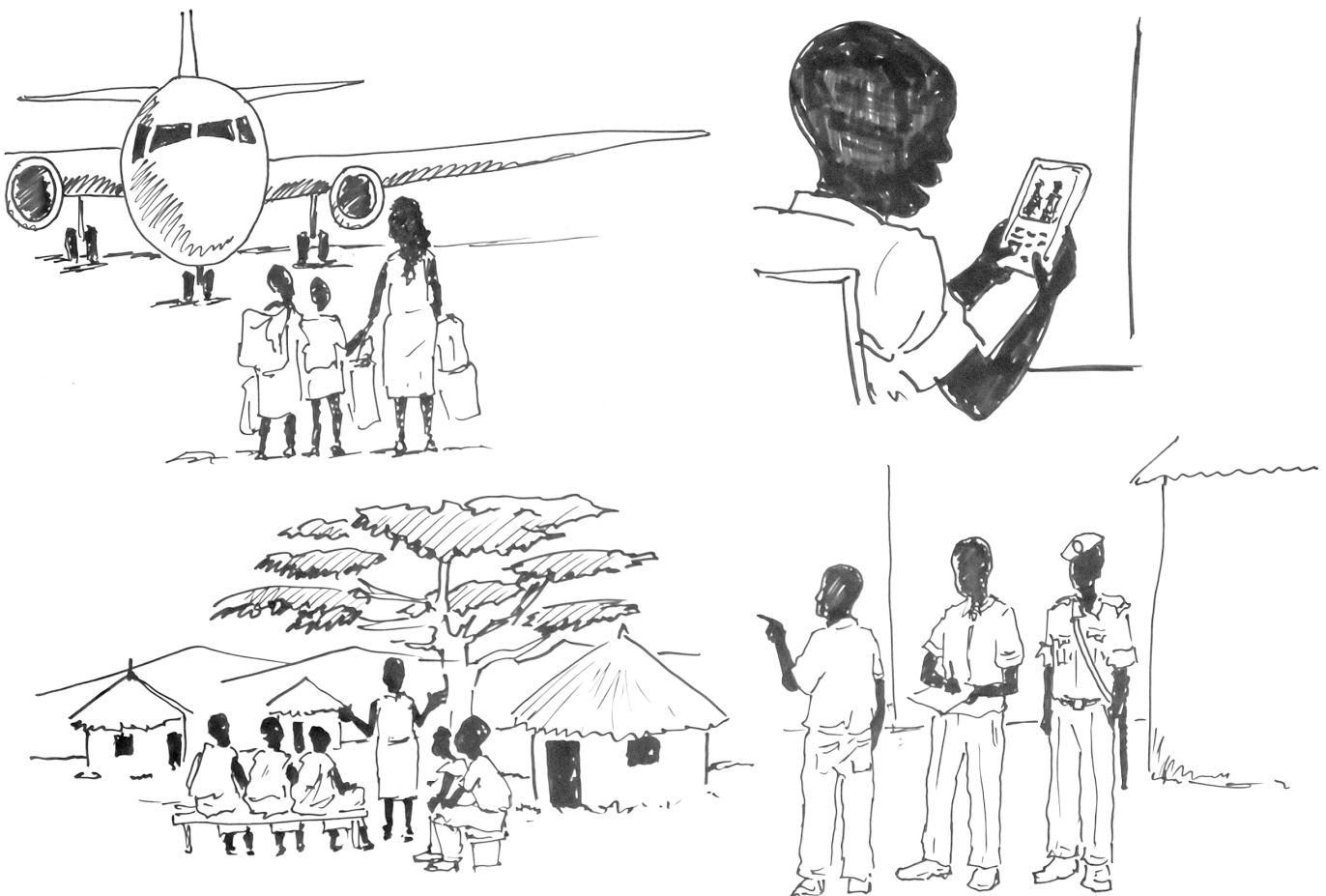
By partnering with survivors and those at risk of slavery as well as visionary investors, governments and anti-slavery organisations, we bring together the knowledge, capital and will needed to dismantle the systems that allow slavery to exist and thrive. Through our investments and support, we aim to shift power, so that frontline organisations and communities can shape and drive the change required to bring modern slavery to an end.

Historically, Kenya's relatively high levels of development, political stability and infrastructure has made the country a major transit and destination hub for regional labour migrants and refugees²³. Nonetheless, despite the Kenya Vision 2030 initiative – which aim to transform the country into a newly industrialising, middle-income country providing a high quality of life to all its citizens by 2030 – the country continues to face multiple development challenges. These include poverty, inequality, climate change and a need for more robust implementation of law and policies²⁴.

The Freedom Fund launched our Kenya hotspot program on the eve of Human Rights Day, December 9th, 2022. The hotspot's overall goal is to create an empowered collective of CDWs, their allies, civic organisations and government institutions with strengthened capacity to transition communities away from child domestic work and to protect children in domestic work from abuse and exploitation. The participation of CDWs and survivors in actively claiming their own rights will be a central feature of the program. We will work at the local level in collaborative efforts between state actors (including social services, labour, justice, education and health service workers) and non-state actors (including community-based organisations, shelters, village leaders, employers and families) to strengthen the protection of the most vulnerable CDWs.

RESEARCH METHODOLOGY

In 2022, the Freedom Fund partnered with the African Institute for Children Studies (AICS) to undertake a formative research study to guide the initial strategic direction of our Kenya hotspot. According to the requirements of the Government of Kenya, the research protocol and related instruments were presented to the Institutional Research Ethics Committee for review and approval. The protocol was then submitted to the National Commission for Science, Technology and Innovation for the granting of a research permit. The study aimed to analyse push factors for child domestic work. We used a mixed methods approach, combining a survey for 406 CDWs and children at risk of entering domestic work (295 female and 111 male), FGDs with 103 CDWs and children at risk of entering domestic work (94 female and 9 male) and 40 key stakeholders, and interviews with 20 caregivers and 12 employers of CDWs. The study covered nine counties, including urban, rural²⁵ and border counties. The border counties were added after the MoLSP officials contacted in the planning phase of this study indicated that there was an increasing number of domestic workers crossing into Kenya for work from Uganda and Tanzania. This information was consistent with findings from a International Labour Organization and MoLSP study on child labour, forced labour and human trafficking²⁶. Snowball sampling identified CDWs, their caregivers and employers, guided by a stakeholder mapping of actors who interact with CDWs, including brokers. To validate the findings, the Freedom Fund and AICS hosted a workshop in December 2022 with 40 key stakeholders: these included representatives from government and civil society, including CDWs. This report draws predominantly on the qualitative data from the research and the validation workshop.



KEY FINDINGS

CHILD DOMESTIC WORK IS COMMONPLACE ACROSS KENYA, AFFECTING BOTH BOYS AND GIRLS

Child domestic work appears commonplace across Kenya, evident in all nine of the surveyed counties. A representative from a community-based organisation (CBO) in Nairobi argued that the number of CDWs is “rising each day due to the [hard] economic times that we are in”. CDWs can be categorised into two groups. First, are those who migrate internally within Kenya for work, often from rural to urban centres (although there are also CDWs in rural areas), or from urban informal settlements to other parts of the cities:

“The children who end up in domestic work often come from the western counties, such as Bungoma, Kakamega and Busia. Some also come from Nakuru.”

Stakeholder in FGD, Nakuru

A second, smaller group of CDWs are those who are sent across borders from neighbouring countries.

“There is a high number of children doing domestic work in Starehe and Mathare [in Nairobi County]. The majority are coming from other East African countries, most commonly from Burundi and Uganda. We have girls coming from the Karamoja region [in the north-east of Uganda].”

Stakeholder in FGD, Nairobi

Key stakeholders nonetheless perceived the latter group to be a sizeable number, pulled to Kenya by better economic conditions than in their home countries.

Although some caregivers lamented that their children had been forced to become CDWs (described in more detail below), child domestic work nevertheless appears to be a socially accepted practice in most communities. For instance, a community leader from Nairobi commented, “you find that [child domestic work] has been normalised within our community”. Although domestic work is traditionally a ‘feminine’ role, the study found that boys also engage in child domestic work as houseboys, though in lower proportions.

When exploring the specific demand for CDWs, the study found that children are perceived to offer several advantages over adult domestic workers: they are cheaper than adults, easier to “control” and not members of workers unions that can monitor any mistreatment.

Furthermore, adult participants reported that children from certain areas, such as Western and Nyanza, are particularly in demand due to a perception that they were kinder, more innocent and hard-working:

“Most people think that the best house helps come from the Western Region. There is this perception that domestic workers from this region are honest.”

Stakeholder in FGD, Kakamega

Children from neighbouring countries, such as Uganda, are reportedly preferred by some employers since they demand a lower average monthly salary (KES 2,000 - 3,000 / USD 17 - 25²⁷) than Kenyan CDWs (KES 5,000 - 7,000 / USD 42 - 58). The demand for CDWs therefore appears to be driven by a combination of economic, social and cultural factors that value children’s vulnerability and dependency over agency, increasing their risk of future exploitation.

MANY CHILD DOMESTIC WORKERS ARE BEING ABUSED AND EXPLOITED IN THE COURSE OF THEIR WORK

Child domestic work is not exploitative per se. Reflecting this, the study found that CDWs who were referred to employers by family members were more likely to report better work conditions, including better pay and job security, contact with family and access to education. Nonetheless, the majority of consulted CDWs reported work conditions akin to modern slavery. Specifically, a fifth of CDWs reported that they were assigned roles or work conditions that differed from the ones agreed at the

point of recruitment²⁸. Some also reported physical and emotional abuse, under the guise of 'discipline', when their work or behaviour was not deemed acceptable. This included slapping, being hit with an object, scolding or withdrawal of privileges. Although no active cases of sexual abuse were reported by CDWs, knowledge of historical cases was disclosed by some participants. The majority of the CDWs (70%) were not taken to a hospital for examination/treatment, resulting in trauma. Parents of CDWs, civil society leaders and employers reported that sexual abuse occurs behind closed doors, putting CDWs at risk of additional physical and psychological harm, including unwanted pregnancies and sexually transmitted diseases.



I met with a child domestic worker early this year. . . I saw many injuries on her body and she looked sad.

The child was not allowed to eat breakfast and her lunch time was always at 3pm. . . She had to sleep in the sitting room, on the couch or on the floor. No blanket, no pillow and no mosquito net were provided. There was no privacy for sleeping. Sometimes, when members of the family go to the toilet at night, they would intentionally kick and wake her.

She was constantly being humiliated by her employer, who would kick and shame her in front of other people, particularly boys of the same age. She wanted to go back home, but her mother had taken an advance [from the employer] every year, so she had to stay and work.



Adult domestic worker, Mombasa

Participants also reported working conditions that contravened Kenyan law. For example, despite the Employment Act (2007) setting limits on children's working hours, 108 CDWs reported working from 5am to 11pm or being on call 24 hours a day, leaving little or no time for education or play. Furthermore, 7% of CDWs reported going entire days without eating. Employers also controlled their social interactions, potentially weakening their external support networks. Some of the consulted CDWs had not left their employment premises for months upon arriving at their place of work and 29% reported that they would not be permitted to leave their workplace if they were severely ill or injured, impeding their basic right to healthcare. Moreover, a fifth of CDWs said they were not permitted to contact loved ones, particularly the youngest participants or those who started work before the age of 15 years. Although the majority of CDWs (89%) reported being compensated for their work (in cash and/or in kind), a tenth performed their duties without pay. Of those who were paid, either their parents collected their salary in person or brokers acted as intermediaries, charging a commission. Only 11% of CDWs reported some degree of financial autonomy by being able to save a portion of their earnings.

Despite the majority of CDWs reporting conditions that curtailed one or more of their rights, most could not leave their work. The findings thus suggest that CDWs' agency continues to be restricted once employed, leaving them trapped in exploitative conditions. Participants observed that, in most cases, parents draw their children's salaries in advance, usually three months or in extreme cases up to one year, locking their child into bonded labour²⁹. In such cases, CDWs are pressurised to stay in employment to avoid subjecting their families to insurmountable debts. Where brokers are involved, the study found that they draw their commission from the advance. If a CDW wishes to leave earlier, their families must pay back double the salary advance; this is known as a 'guarantee' to stop CDWs leaving. Furthermore, the broker can place the child with a different family or business where they will draw an advance on the salary to reimburse the first debt, keeping the CDW's family indebted to them. Consequently, the greater the degree of exploitation, the harder it typically is for CDWs to escape conditions of modern slavery.

CHILDREN ENGAGE IN DOMESTIC WORK FOR A MULTITUDE OF REASONS, BUT RARELY THROUGH THEIR OWN CHOICE

The study found that some CDW respondents choose to enter domestic work in pursuit of better opportunities. However, children typically become CDWs through push factors linked to poverty. Certain children were reported to be particularly vulnerable to poverty-related push factors; these include children from rural areas, orphans, children living with stepparents and families with high ratios of dependents to earners (for example, children with large numbers of siblings, polygamous families, households headed by economically inactive grandparents or female-headed households). The study found that CDWs often enter domestic work after a 'family misfortune' (such as family illness, relationship breakdowns or death) triggered an economic shock at a household level:

"My child started working when I got extremely sick and their father abandoned us. . . I could not pay for their food nor take care of myself. . . The child is supporting our family."

Caregiver of CDW, Isiolo

Children also become CDWs after being forced to leave education. For some, this is linked to poverty, such as households unable to afford the remaining costs of primary or secondary school; this is despite the government introducing 'free' secondary day school in 2017, covering most fees. Other children are pushed from school into domestic work by social factors, such as harsh treatment by teachers, large distances between school and home (on bad roads) in rural areas, and early pregnancy.

Against this backdrop of increased pressure due to external push and pull factors, the study found that the final decision about whether children enter domestic work normally lies with adult caregivers. It was clear that some caregivers did not want their children to enter domestic work:

"I know that a child is not supposed to be employed, but because of poverty, they have to work. If the child is not earning something, even a small wage, then the other siblings will die because there are no other means."

Caregiver of CDW, Isiolo

Yet, when faced with not enough resources to meet the whole families' needs, they had to decide how to balance these needs.

Nonetheless, domestic work was also framed by participants as a potentially protective factor. For instance, when poverty curtailed their child's right to education, some parents negotiated for them to have access to education alongside their work. Other caregivers reportedly sent their children to work as CDWs in urban areas to protect them from forced recruitment into clan security services due to inter-clan conflicts. Since 'idleness' in childhood is culturally linked to disruptive behaviours, participants also explained that domestic work is often perceived as 'better' for the child's character if the child drops out of school and thus has nothing to do. These push factors mean that CDWs' agency is typically very restricted at the point of entering employment, leaving them with little or no opportunities to meaningfully consent to work, let alone negotiate their employment terms.

THERE IS CURRENTLY A LACK OF CLARITY AROUND WHAT CONSTITUTES HARMFUL CHILD DOMESTIC WORK

When discussing how to address modern slavery in relation to child domestic work, validation workshop participants argued that we need to separate 'household chores' and 'work' that is exploitative, hazardous, and dehumanising. However, the Kenyan legal framework currently does not provide a clear definition of what is child domestic work. Nor does it set a minimum age for domestic work, as per the ILO Convention 189 which Kenya has not ratified. Similarly, although the Employment Act (2007) allows children aged 13 to 16 years to engage in "light work", the legislation provides only limited guidance on what this actually means in practice³⁰, with no guidance specific to child domestic work. Thus, employers have considerable freedom to interpret the law from their own perspectives. The Employment Act also distinguishes between work done for non-relatives, which requires a contract, and work done within a family setting, which does not³¹. Since many CDWs are sent to work for extended family, there is consequently a risk that their labour (no matter how exploitative) will not be covered by

the safeguards of formal employment. Finally, validation workshop participants noted contradictions between the Basic Education Act (2013) and Employment Act (2007) that require attention. Specifically, the former prohibits the employment of children who qualify for basic education (up to secondary school – typically 18 years of age), while the latter permits 16 and 17 year-olds to be employed in non-hazardous work, subject to labour officer regulation.

The lack of clarity about what is child domestic work, and particularly harmful work, is further clouded by differing social constructions of the boundary between “childhood” and “adulthood”. Participants noted that employment laws may conflict with cultural constructions of childhood since girls who have been married, circumcised, or given birth are often deemed adults and expected to fulfil adult roles, such as work. For example, a CDW from Kisumu explained, “when a girl has a child from teenage pregnancy, she ceases to be a child and is expected by the parent and community to work and find food for the child”. Therefore, although participants generally defined children as persons below 18 years, the study found that some girls, such as young mothers, risk being considered as adults, losing their protection and status as a dependent child.

Therefore, age-defined boundaries of childhood found within policy may not reflect community-based understandings and realities. Similarly, validation workshop participants noted that child domestic work is often understood as a form of socialisation: “chores” rather than formal “work”. As such, domestic work that impedes a child’s development, and is thus illegal, risks being defined as “chores” or regarded as a normal part of a child’s upbringing. This is further complicated when CDWs work for extended family members, blurring the line between “work” and “help”. In some cases, in Kajiado, Nairobi and Nakuru counties, the line between informal fostership³² and child domestic work also appears blurred, with CDWs being nurtured and educated in exchange for domestic work. The construction of the CDW as a family member therefore risks transforming their labours from “work” to “family chores”.

The lack of clarity over what is child domestic work has potentially significant implications. Critically, if employers and caregivers do not view CDWs as workers, but instead see their work as “helping”, they will not perceive them to be covered by employment legislation. Furthermore, the limited guidance over what constitutes acceptable and unacceptable domestic “work” means that it’s difficult for employers to understand acceptable forms of child work versus prohibited child labour, let alone comply with the law. For instance, the employers interviewed in the study did not perceive long working hours to be problematic because CDWs enjoy frequent “leisure time” during the day while they watch TV with children in their care or provide company to an elderly family member. Some stakeholders, including caregivers, therefore called for clearer definitions of illegal child domestic work:

“I have yet to hear of a policy on child domestic workers. . . The one on child labour needs to be clearer about the minimum age for employment, I understand it [as acceptable] for children 13 years and older.”

Caregiver of CDW, Nakuru

Admittedly, clearer guidance and sensitisation on CDWs’ labour rights will not stop all employers exploiting their workers. However, it would at least prevent employers from using ignorance as an excuse for abuse.

THE CURRENT LEGAL AND POLICY FRAMEWORK DOES NOT AFFORD CHILD DOMESTIC WORKERS THE SAME RIGHTS AS ADULT DOMESTIC WORKERS

The current legislative framework, while designed to protect child workers, nonetheless denies them some of the same basic rights and entitlements enjoyed by adult workers. For example, although The Regulation of Wages (General) (Amendment) Order (2018) set minimum wages for domestic workers, it is not clear if this applies to children since it only lists domestic worker roles without specifying whether the minimum salaries also apply to the “light work” that 13-16-year-olds are permitted to undertake. Similarly, the new Children Act (2022) does not provide guidance on remuneration for children engaged in legally permitted work. Possibly reflecting this, the study found that most CDWs earn considerably less than adult domestic workers. CDWs typically earn KES 5,000 - 7,000 / USD 42 - 58 per month, compared to the legal minimum wage of KES 7,241 - 13,573/ USD 60 - 113 per month for adult domestic workers.

Validation workshop participants also observed that discrepancies between different education and work policies exacerbate the gap between children's and adult workers' rights. For example, children who do not enter secondary school can enrol in technical and vocational education and training for 1- to 2-year vocational courses. However, upon graduating, they do not qualify for full-time employment with the accompanying benefits, such as independent enrolment in the National Health Insurance Fund (NHIF) or National Social Security Fund (NSSF), until they reach 18 years old. CDWs and children at risk of domestic work also noted this gap in rights, reiterating the need to register with basic social security schemes, such as NHIF and NSSF:

"The assistance that child domestic workers need from support organisations includes recognising children who are doing domestic work; registering them for the National Health Insurance Fund and National Social Security Fund; helping them get time off work; and delivering services to protect and support these children."

CDW in FGD, Kakamega

This is not to say that children should work under the same conditions as adults – safeguards protecting their well-being and development are absolutely critical. However, older CDWs often do the same work as adult domestic workers, as permitted by the law, but without equal access to entitlements.

Finally, key stakeholders from Kakamega also noted that child workers, including CDWs, are denied adequate opportunities to exert their right to participation:

"Nobody consults the child domestic workers on what they want in life..."

Stakeholder in FGD, Kakamega

Validation workshop participants noted that the Kenya Union of Domestic, Hotels, Educational Institutions, Hospitals and Allied Workers, the union which covers domestic workers, confirmed that there is an opportunity for older CDWs (over 16 years of age) to join the union and this issue has been discussed. However, as yet, no actions have been taken. It is also not clear how effectively CDWs will be represented and have a voice within adult structures. Thus, at present, CDWs appear to lack the collective bargaining power that can be leveraged by adult domestic workers. Even where alternative participation platforms do exist for children, such as the Kenya Children's Assembly, they do not yet represent all children since the election of child leaders tends to focus on mainstream spaces, such as schools, overlooking children on the peripheries, such as CDWs.

THERE IS EXTREMELY LIMITED MONITORING OR OVERSIGHT OF CHILD DOMESTIC WORKERS' WORK CONDITIONS

Labour officers are responsible for monitoring and enforcing labour law compliance³³. However, despite the policy framework being designed to safeguard child workers, the study found that there was extremely limited state monitoring of CDWs' work conditions. A CDW from Kakamega summed up some of the CDWs' notable frustration at the lack of oversight and support, saying, "We need care and protection from exploitation". The limited oversight of CDWs' working conditions places them at risk of the harmful working conditions outlined in this report, especially given their dependent relationships with their employers.

When considering why monitoring of CDWs is scarce, various challenges were identified. Firstly, validation workshop attendees and research study participants alike observed that CDWs' isolation in private homes renders them invisible, hidden from the organs of the law and omitted from employment statistics. Indeed, CDWs are often "inaccessible" because, unlike workers in a factory, their place of employment is a private residence. Thus, an enforcement gap arises from the distinction between "industrial properties" and "households", with the latter being considered "private" spaces. Compounding this, CDWs who do not go to school are hidden from educators who can otherwise play a critical role in identifying children in need of care and protection. Validation workshop participants also noted that criminal "cartels" facilitate the concealment of CDWs, providing falsified ID cards to hide the fact that children are below the age of legal employment, particularly those going through brokers. None-

theless, the workshop participants noted that the public vs private divide could possibly be bridged by strengthening the capacity of Children's Officers to monitor CDWs' work conditions since they have the mandate to enter houses to check on children's welfare. Supporting this assertion, section 18 of the Children Act (2022) does frame exploitative work conditions, including domestic servitude, as a child protection concern. So although monitoring is not explicitly specified, protecting children from harmful child labour does fall under the remit of Children's Officers.

Key informants who participated in the study also observed significant logistical and economic impediments to monitoring child domestic work. A key informant working in Nairobi County noted that "child labour also gets little attention because there are not enough resources to deal with it". Thus, although stakeholders noted that the law mandates the Department of Labour to conduct checks on workers, in reality the department is not sufficiently resourced to conduct these checks at a household level. This challenge is exacerbated by the fact that CDWs work in individual houses, so are widely dispersed, making it impossible to contact them collectively. This barrier would also likely affect Children's Officers taking on a monitoring rather than response role to hazardous child domestic work.

Given the logistical and financial challenges of monitoring CDWs' work conditions, reporting mechanisms through which children can self-report workplace violations are critical. However, most of the consulted CDWs were not aware of their rights, nor how to report any rights violations. Reflecting on this, a caregiver from Nakuru commented:

"Child domestic workers know very little about their rights, what to do [in the event of violation] or where to report it. . . So I do think it is important to inform them. But it is difficult to reach and communicate with them unless they watch TV or listen to radio."

Caregiver of CDW, Nakuru

As noted by this caregiver, more information is needed on the mechanisms through which CDWs can be targeted with awareness campaigns, particularly for those without access to school or mass media. Concerningly, the study also found that CDWs' understanding of the term "exploitation" was complex. Despite recognising the harmful ways in which they were treated, some CDWs nonetheless highlighted the benefits of their work, such as education, healthcare or shelter. Their vulnerability therefore led them to accept abusive conditions so they could claim what should be universal child rights. This is unlikely to change till CDWs are sensitised on their rights, know how to report rights violations, have access to survivor-centred response services to support them to leave hazardous work and, crucially, have sufficient trust that these response services will prevent them from being further harmed.

COMMUNITY MECHANISMS ARE PLAYING A CENTRAL ROLE IN PLACING CHILDREN IN POTENTIALLY EXPLOITATIVE DOMESTIC WORK RATHER THAN OFFERING CARE AND PROTECTION

In contrast to the challenges state actors face in monitoring CDWs' work conditions, communities are well-placed to take a monitoring and protection role. They not only have close, existing ties with CDWs, their families and their employers, but are already involved in child domestic work processes, especially the placement of CDWs. Specifically, the study found that employers, CDWs and caregivers of CDWs all prefer to turn to people they know and trust within their communities when either hiring a CDW or placing their child with an employer. These might be family, friends, or community figureheads, such as religious leaders³⁴, with the latter sometimes acting as paid intermediaries:

"My employer is from the same village and she knows my family as well. Her family needed help and my family had difficulty, so I decided to work in her house."

Female CDW, Mombasa

Even where CDWs are placed, or seek work, through a broker or recruitment bureau, the latter still rely on community networks; validation workshop attendees described brokers or recruitment bureaus as mainly unregistered entities, run from an individual's home, who use community structures to identify and recruit children. However, whereas community intermediaries draw on community-based trust, participants said brokers tend to be formidable characters in their communities who command fearful respect from their customers.

The central role of community ties and relations in placing CDWs arguably presents an under-utilised protection opportunity since community members are already involved in the recruitment process and know which households have CDWs. Furthermore, where brokers act as intermediaries for salary transmission, they maintain contact during the CDWs' employment, providing an opportunity to monitor the child's work conditions. However, despite some of the interviewed brokers depicting themselves as service providers who help families on both ends of the equation, key stakeholders noted that rather than protecting CDWs, brokers typically earn money from recruiting, transporting and placing them in often abusive and exploitative employment situations, trapping some in bonded labour. Furthermore, when considering the role of the wider community, the study found that almost every research participant believed child domestic work to be a private affair and implied that it is not polite or customary to interfere in people's domestic affairs. In fact, in FGDs in Mombasa and Kajiado counties, adult domestic workers spoke of witnessing CDWs being beaten, spanked, pinched, burnt and kicked by their employers, but did not interfere. A recurring theme of non-interference was evident in all nine counties, driven by fear and a lack of confidence that action would be taken in favour of the abused child. This demonstrates that community-protection initiatives can only be successful if they are accompanied by interventions that challenge accepted social norms and a survivor-centred response system that robustly protects abused CDWs from further mistreatment.

Nevertheless, there is clear precedence for involving communities in community-based protection activities around hazardous forms of child labour. In particular, the validation workshop attendees discussed the aforementioned Nyumba Kumi approach, a successful community-based initiative that has gone as far as retrieving child labourers and engaging in building capacity and relationships between the community and police. Workshop participants consequently argued that civil society, non-government organisations and grassroots administrators should all work together to build relationships and move beyond conflict/disagreements, tackling exploitative child domestic work together.



THERE IS A NEED TO STRENGTHEN AND INCREASE FUNDING FOR SERVICES SPECIFICALLY PREVENTING AND RESPONDING TO HARMFUL CHILD DOMESTIC WORK

Key stakeholders noted that CDWs who have been engaged in hazardous work have complex needs that require a holistic response after the initial safety risks have been addressed. These include health, psychosocial, shelter, protection and educational needs. CDWs and children at risk of entering harmful domestic work who were consulted as part of the study also requested support to achieve their aspirations and nurture their talents, like singing, sports or cooking. This view was echoed by caregivers and other stakeholders who called for CDWs to receive support to advance their skills:

"We also need the national government's Affirmative Action Fund to support children in domestic work to access vocational skills training. For instance, a 15-year-old girl who has dropped out of school and is not interested in returning, she should be assisted to gain vocational qualifications."

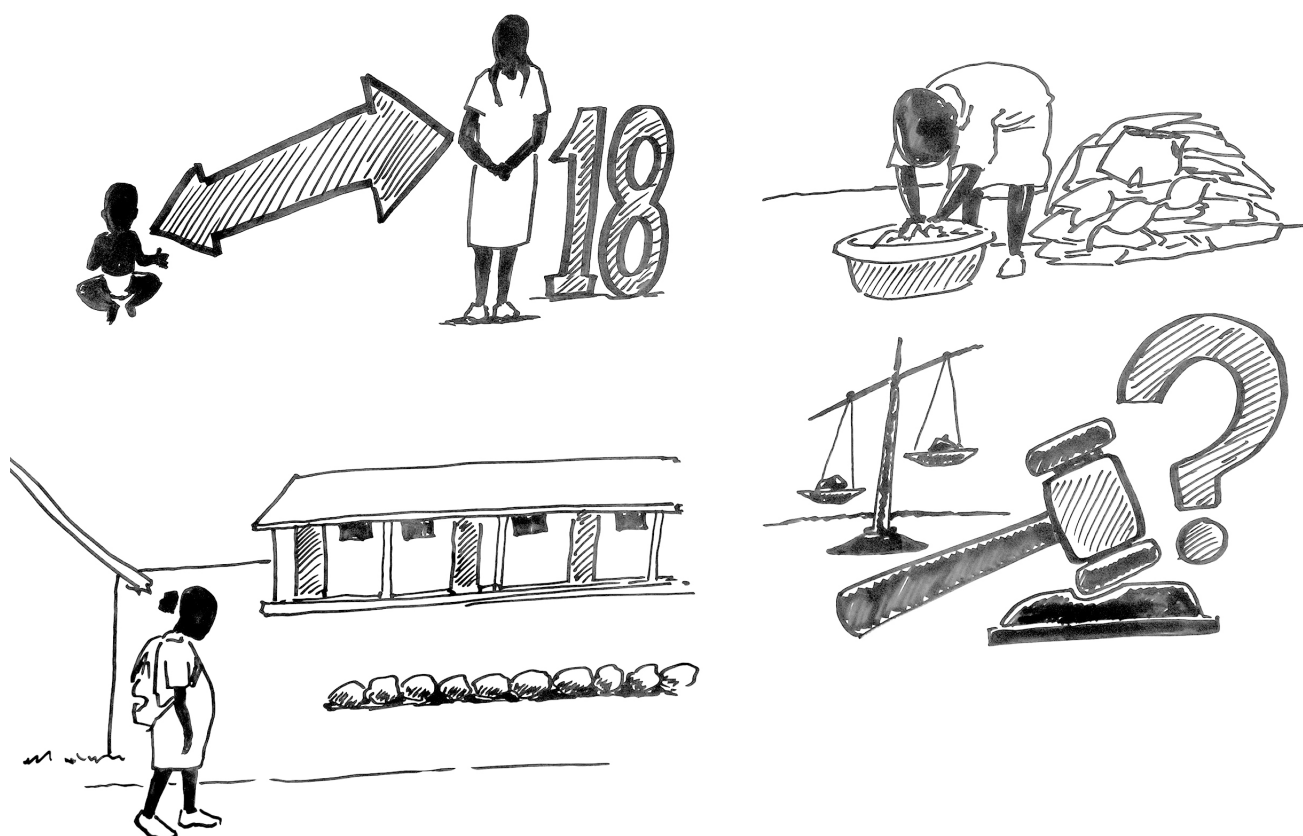
Caregiver of CDW, Nakaru

For these children and caregivers, domestic work was seen as a pathway towards further growth and opportunities. They did not consider domestic work to be the culmination of the child's development or achievement.

When considering who provides services to either prevent vulnerable children from entering domestic work or support CDWs who have experienced abuse and exploitation, survey participants generally perceived there to be insufficient interventions or child protection systems at a community level for CDWs. Mirroring this, a CDW remarked that they wanted the government to take a stronger role in protecting child workers:

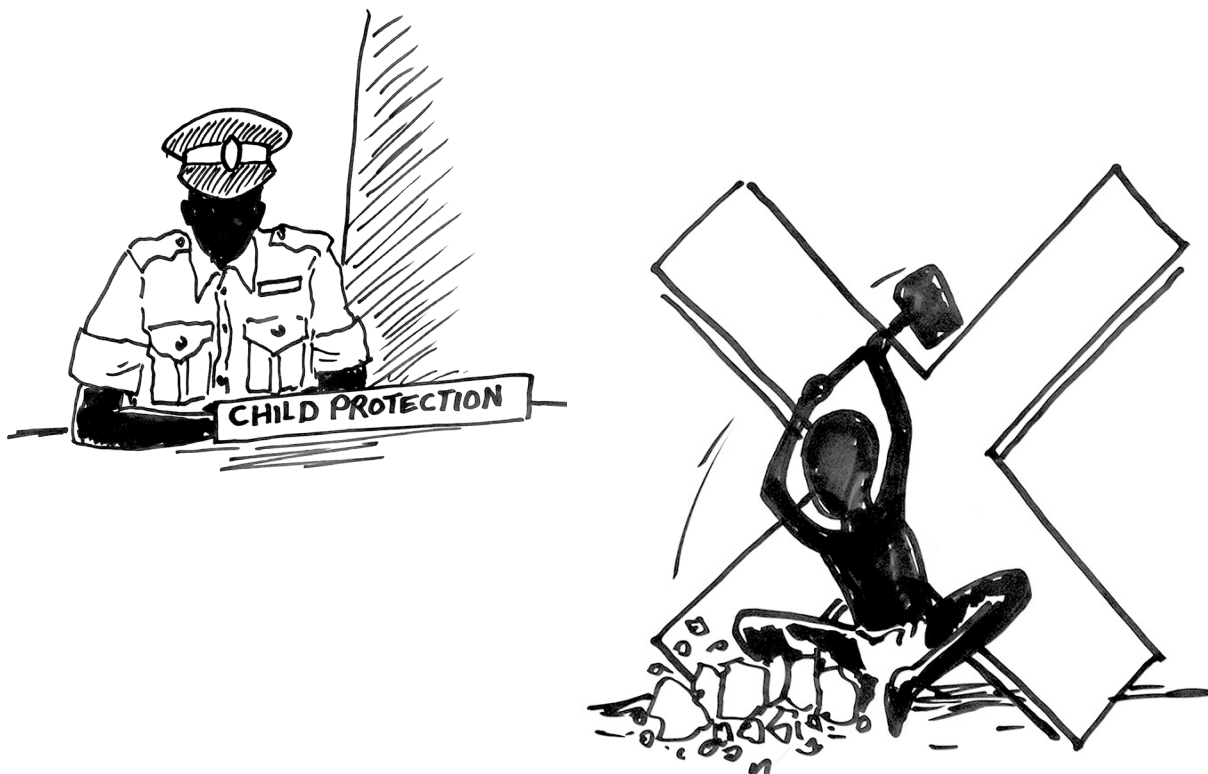
"I became a domestic worker after losing my parents and had no one to help me. I would like the government to support orphans to prevent them from child labour."

CDW in FGD, Garissa



However, despite this finding, it should be noted that there are state mechanisms at a community and sub-county level, such as Chiefs, Sub-County Commissioners, Children's Officers and Education Officers, who can intervene if they are informed that a child is in need of care and protection. As noted earlier, the challenge is first to identify such cases. Furthermore, one non-governmental organisation (NGO) who is working on increasing access to justice for CDWs noted that, in their experience, state actors are not always adequately sensitised on the need for legal interventions in hazardous cases of child domestic work, dismissing cases where there was no evidence of defilement. There is consequently a need to increase local state actors' understanding of what constitutes illegal practices relating to child domestic work. In the validation workshop, participants also noted a need for state and civil society actors to focus on complementarity, rather than emphasising government versus non-government services. This includes learning from each other and practically supporting each other so that local civil society groups are not closed down due to bureaucracy. Civil society should not be expected to shoulder the risk of stopping abuse by themselves and can report cases to state child protection actors so that statutory actions can be taken.

In terms of specific programming gaps, stakeholders called for a welfare fund to support CDWs, with a key informant from Nairobi noting that an emergency fund is required so that children are rescued as needed rather than limited by available funding. A new Child Welfare Fund has been proposed under article 12(7) of the Children Act (2022), although the extent to which CDWs will be able to access it is still unclear. The stakeholder mapping also found that community-based organisations, such as CBOs, Faith-based organisations (FBOs) and NGOs, are a crucial resource for supporting CDWs, with most services focusing on the prevention of, and response to, abusive work. However, key informants warn of the challenges faced by local organisations, especially inadequate and unsustainable funding. It was also noted that CBOs often lack sufficient institutional capacity to support resource mobilisation and are therefore unable to attract and retain adequately qualified technical staff. Finally, the stakeholder mapping identified a gap in CDW-led organisations, as well as limited opportunities for CDWs to make their voices heard, with a stakeholder from Isiolo arguing, "there is a need for empowering the children so that they can have their influence in either raising, voicing, whatever is affecting them or fighting for their rights". CDWs' needs and unfulfilled rights can therefore only be fully understood and addressed once they are engaged in advocacy and dialogue with key stakeholders.



RECOMMENDATIONS

STRENGTHEN LEGAL AND POLICY FRAMEWORK

To strengthen the existing legal and policy framework for regulating child domestic work and preventing and responding to hazardous forms of labour, policy makers should:

- Develop clear guidance on monitoring and responding to child domestic work. This includes defining what constitutes illegal child domestic work, setting a minimum age for children to be employed as domestic workers, and outlining the roles and responsibilities of key actors tasked with safeguarding CDWs, including state actors, private sector actors and non-governmental actors at national, county and sub-county level.
- Allocate sufficient resources to successfully implement new and existing policies that protect the rights of CDWs, such as the Children Act and Employment Act.
- Strengthen the legal and policy framework for tackling child domestic work. This includes ratifying ILO Convention 189 and integrating its measures into national policy and harmonising existing employment and education legislation that address child labour, including the Basic Education Act and Employment Act.

To allow CDWs to play a meaningful role in driving policy and practice, civil society actors should:

- Initiate and/or strengthen networks of child survivors so that they can advocate for their rights. This includes increasing the capacity of CDWs to organise themselves, develop mechanisms for self-representation and create activist initiatives based on their own priorities that can also be used for collective bargaining.

ENHANCE PREVENTION OF HAZARDOUS CHILD DOMESTIC WORK

To reduce the risk of children entering child domestic work against their will, and at the detriment of their well-being and development, state actors (for example, labour officers, children's officers, deputy county commissioners, chief) and civil society actors (for example, NGOs, CBOs, FBOs) should:

- Develop or expand existing economic empowerment programming that targets households with children at high risk of entering hazardous child domestic work. Suggested activities include regulated micro-finance, employment support, financial literacy programmes, school bursaries or scholarships to support the transition from primary to secondary school, and financial assistance programmes, such as conditional cash transfers (where the caregiver receives the cash transfer as long as specific conditions are met, such as their child remaining in school), and unconditional cash transfers (for example, the Hunger Safety Net Programme).
- Expand viable job pathways for out-of-school, rural youth seeking transition to urban areas in search of job opportunities. This may include providing them with vocational skills that are relevant to the local market, including homecare management for those who choose domestic work as a profession, enhancing access to child-centred childcare for young mothers while they undertake training and working with local childcare providers to strengthen the quality and safety of services.
- Develop and launch national and community-based norms and behavioural change campaigns sensitising employers, caregivers, brokers and community intermediaries on CDWs' legal rights and their own responsibilities. The campaigns should raise key stakeholders' awareness of the legal framework safeguarding CDWs' rights, while simultaneously addressing harmful social norms that help perpetuate or conceal hazardous child domestic work. Interventions should be designed in collaboration with CDWs to ensure appropriate messaging and targeting.

STRENGTHEN DETECTION OF AND RESPONSE TO HAZARDOUS CHILD DOMESTIC WORK

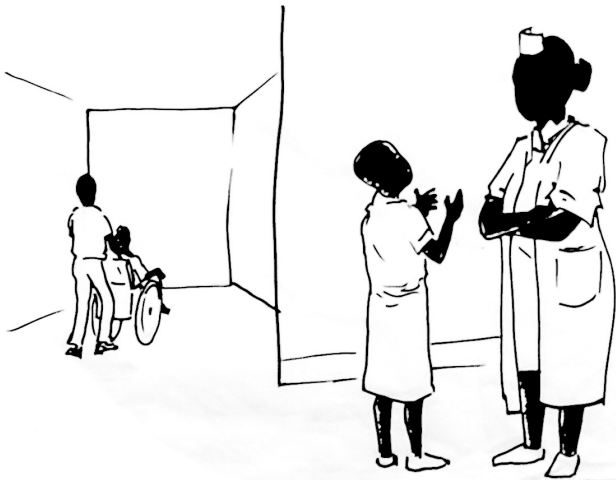
To increase detection of CDWs engaged in hazardous child domestic work, and ensure provision of holistic, trauma-informed, and survivor-centred packages of care for CDWs in need of care and protection, state actors and civil society actors should:

- Expand research and data collection on CDWs, using a child-participatory research approach, to support the development of evidenced-based interventions. This could include the initiation of regular national child labour surveys or the inclusion of a question on child domestic work in the national Census. Information should be shared with child protection and labour actors so that they can tailor their interventions to suit CDWs' unique circumstances.
- Develop and implement awareness campaigns sensitising CDWs on their rights and reporting channels to increase self-reporting. These should be developed in partnership with CDWs to ensure the messaging resonates with the target audience.
- Increase resources for state-monitoring of CDWs. This includes boosting funding and human resources for work-based monitoring of CDWs and sensitisation of employers on the state's right to monitor domestic workers.
- Strengthen the capacity of existing national-, county- and community-based mechanisms through which hazardous child domestic work can be detected. These include community-level government actors (such as chiefs, children's officers, education officers), FBOs, schools, CBOs, community health workers, and labour violation or child protection helplines.
- Pilot community-driven programmes aimed at monitoring and responding to harmful forms of child domestic work. These can be new or adapted approaches, such as the Nyumba Kumi initiative.
- Increase funding and capacity development for state and civil society actors offering child protection response services to CDWs. This includes mobilising existing welfare funds for CDWs and capacity development of key stakeholders on the provision of holistic, trauma-informed interventions to CDWs affected by harmful child domestic. The latter should be gender- and age-sensitive and target state protection actors (for example, children's officers, chiefs, deputy county commissioners), children's rescue centres, schools, judicial services, NGOs, charitable children's institutes and FBOs. Coordination should be strengthened between services to ensure a seamless transition from rescue to reintegration services, including alternative family care (for example, foster care).
- Provide funding for survivor-led services targeting CDWs which focus on prevention, mitigation, and response to modern slavery.
- Address vulnerability factors that increase risk of child pregnancy, and the subsequent risk of young mothers entering child domestic work to support their children. This could include interventions targeting retention of girls in school in low-income areas.

ENDNOTES

- 1 The government of Kenya has instituted policy and legal measures to address child labour, including child domestic work, such as the establishment of the Division of Child Labour in the Ministry of Labour and Social Protection. Kenya's Constitution 2010 expressly identifies child labour as a potential violation of children's rights; legislation and policy addressing child labour includes the Employment Act 2007, Basic Education Act 2013, the List of Hazardous Work, 2014 and the Children Act 2022 which prohibits exploitative child labour.
- 2 Modern slavery refers to situations "when an individual is exploited by others, for personal or commercial gain. Whether tricked, coerced, or forced, they lose their freedom. This includes but is not limited to human trafficking, forced labour and debt bondage" (taken from <https://www.antislavery.org/slavery-today/modern-slavery/>). When attempting to quantify the prevalence of modern slavery, ILO looks at both forced labour and forced marriage, with both being 'situations of exploitation that a person cannot refuse or cannot leave because of threats, violence, deception, abuse of power or other forms of coercion' (p.2), ILO, Walk Free and IOM, "Global Estimates of Modern Slavery: Forced Labour and Forced Marriage." ILO, https://www.ilo.org/wcmsp5/groups/public/---ed_norm/--ipec/documents/publication/wcms_854733.pdf, September 2022.
- 3 Munene, I. I. & Ruto, S. J., 2010. "The Right to Education for Children in Domestic Labour: Empirical Evidence from Kenya." *International Review of Education*, Issue 56, pp. 127-147.
- 4 U.S. Embassy Nairobi, 2021. "Findings on the Worst Forms of child labour: Kenya." https://www.dol.gov/sites/dolgov/files/ILAB/child_labor_reports/tda2021/Kenya.pdf.
- 5 ILO, "Practical Guide to ending child labour and protecting young workers in domestic work, International Labour Organization, Fundamental Principles and Rights at Work Branch (FUNDAMENTALS)" - Geneva: ILO, 2017.
- 6 Thi, A.M., Zimmerman, C., Pocock, N.S., Chan, C.W. & Ranganathan, M. "Child Domestic Work, Violence, and Health Outcomes: A Rapid Systematic Review." *International Journal of Environmental Research and Public Health*. 2022; 19(1):427. <https://doi.org/10.3390/ijerph19010427>.
- 7 The urban counties were Nairobi, Mombasa, and Kisumu; the rural counties were Kakamega, Isiolo and Nakuru; and the border counties were Kajiado, Busia, and Garissa.
- 8 Nyumba Kumi, Swahili for ten households, refers to a community-level governance system popular in Kenya and Rwanda. It is anchored in government policy and requires every ten households in Kenya to be organised as the lowest governance unit and have a representative. The representative serves as a liaison between the ten households and the village elder or local chief. The Nyumba Kumi leader addresses all concerns, including insecurity or access to social services. It is, however, a growing initiative and is more established in rural areas and low-income communities in urban areas.
- 9 International Labour Organization and United Nations Children's Fund, "Child Labour: Global estimates 2020, trends and the road forward", ILO and UNICEF, New York, 2021. https://www.ilo.org/ipec/Informationresources/WCMS_797515/lang--en/index.htm.
- 10 Blagbrough, J. "Child domestic work: Summary framing paper". The Freedom Fund, November 2021, https://freedom-fund.org/wp-content/uploads/ChildDomesticWork_2021_11.pdf
- 11 Taken from: <https://www.unicef.org/kenya/stories/lets-end-child-labour-kenya>.
- 12 In March 2023, the MoLSP reported that a Child Labour Survey would be conducted this year - the first in 15 years (<https://www.labour.go.ke/kenya-conduct-child-labour-survey-after-15-years>).
- 13 'Hazardous child labour is defined by Article 3 (d) of ILO Convention No. 182 concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour, 1999, as: (d) 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'. (Taken from: <https://www.ilo.org/ipec/facts/WorstFormsofChildLabour/Hazardouschildlabour/lang--en/index.htm>).
- 14 Munene, I. I. & Ruto, S. J., 2010. "The Right to Education for Children in Domestic Labour: Empirical Evidence from Kenya." *International Review of Education*, Issue 56, pp. 127-147.
- 15 U.S. Embassy - Nairobi. Reporting. February 11, 2021. "Findings on the Worst Forms of child labour: Kenya." https://www.dol.gov/sites/dolgov/files/ILAB/child_labor_reports/tda2021/Kenya.pdf.
- 16 IDAY-Kenya, PALM and Okemwa, P.F., "Report of Survey: Domestic Workers in Kenya." Final Report. IDAY/PALM, Kenya, 2015.
- 17 ILO, "Practical Guide to ending child labour and protecting young workers in domestic work".

- 18 Thi, A.M. et al., "Child Domestic Work, Violence, and Health Outcomes: A Rapid Systematic Review."
- 19 World Food Programme. "Kenya Annual Country Report 2022." WFP, 2023. <https://reliefweb.int/report/kenya/kenya-annual-country-report-2022-country-strategic-plan-2018-2023>.
- 20 ACAPS, "Kenya: Impact of drought on the arid and semi-arid regions." ACAPS, 29 March 2022, <https://www.acaps.org/country/kenya/crisis/drought>.
- 21 Older studies with similar findings include: Suda, C., "The Invisible Child Worker in Kenya: The Intersection of Poverty, Legislation and Culture," *Nordic Journal of African Studies* 10(2): 163-175 (2001); Abuya, N.E., "Trafficking of children into domestic labour. A case study of Nairobi City, Kenya." Masters Thesis (Criminology and Social Order), Nairobi University, 2011; Chebet, S.P., Masinde, J.R.M., & Kareithi, J., "Factors Influencing The Girl Child In Urban Domestic Service Labour In Eldoret, Uasin-Gishu County, Kenya." *IOSR Journal of Humanities And Social Science (IOSR-JHSS)*, 23(6), Ver. 1: 88-93, June 2018.
- 22 For example, the current government has launched new initiatives to support youth, such as The Kenya Youth Employment & Entrepreneurship Accelerator Program that will run from 2023-2028 and aims to create 1 million jobs and entrepreneurship opportunities, and the Hustler Fund, which aims to provide cheaper credit for micro and small businesses (<https://kepsa.or.ke/kepsanews/kepsa-targets-1-million-new-jobs-and-entrepreneurship-opportunities-for-youth-and-women-in-the-next-5-years>; Home | Hustlers Fund (hustlerfund.go.ke).
- 23 Kenya had the third highest international migrants in the East Africa Region in 2020, after Uganda and Ethiopia. For more details about Kenya's labour market, with a focus on migrant workers, see: ILO and IGAD, "Labour market assessment with focus on migrant workers from the IGAD region: Kenya country report," ILO, <https://igad.int/download/labour-market-assessment-with-a-focus-on-migrant-workers-from-the-igad-region-kenya-country-report/>, 2021.
- 24 For details of Kenya Vision 2030 progress see: Republic of Kenya, "Kenya vision 2030 flagship programmes and projects progress report (fy 2020/2021)," https://vision2030.go.ke/wp-content/uploads/2022/09/FINAL-EDITED-VISION-2030-FLAGSHIP-PROJECT-PROGRESS-REPORT_170820221-1.pdf, August 2022.
- 25 The urban counties were Nairobi, Mombasa, and Kisumu; the rural counties were Kakamega, Isiolo and Nakuru; and the border counties were Kajiado, Busia, and Garissa.
- 26 ILO and MoLSP, Kenya, "Knowledge Attitude and Practices (KAP) Survey on Child Labor, Forced Labor, Human Trafficking, and Violations of Acceptable Conditions of Work in Kenya." Published by ILO CAPSA Project, Nairobi, Kenya, 2021.
- 27 Based on historical average exchange rate from January to December 2022, at USD 1 = KES 120.11, and rounded to the nearest dollar.
- 28 For some, this meant different working conditions. For others it meant also working in their employers' businesses, such as tailors or grocery shops, blurring the line between domestic and non-domestic work and increasing the child's workload.
- 29 Bonded labour refers to situations where individuals who are trapped in poverty borrow money and are forced to work to pay off the debt, losing control over both their employment conditions and the debt (taken from <https://www.antislavery.org/slavery-today/bonded-labour/>).
- 30 Section 56(2) of the Employment Act (2007) says that A child of between thirteen years of age and sixteen years of age may be employed to perform light work which is (a) not likely to be harmful to the child's health or development; and (b) not such as to prejudice the child's attendance at school, his participation in vocational orientation or training programmes approved by Minister or his capacity to benefit from the instructions received.
- 31 This mirrors the ILO Convention 189 that defines domestic work as the employment by third party private households.
- 32 This typically referred to children who were living with extended family, where the line between employer and caregiver risks becoming very blurred.
- 33 Kenya Employment Act 2007, Part VII "Protection of Children" section 54 and 55 on complaints to the labour officer or police officer and powers of labour officer to cancel and prohibit contracts.
- 34 In five of the sampled counties, religious leaders, regardless of denomination, were depicted as the go-to person for families seeking to place children in domestic work and families seeking to hire them.



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The Freedom Fund (US)

315 Flatbush Avenue
#406
Brooklyn, NY 11217
USA
+1 929 224 2448

The Freedom Fund (UK)

Lighterman House
30 Wharfdale Road
London, N1 9RY
UK
+44 20 3777 2200

 www.freedomfund.org
 info@freedomfund.org
 [@Freedom_Fund](https://twitter.com/Freedom_Fund)

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