

## Open Request for Proposals

### Kenya Hotspot Program

The Freedom Fund is seeking proposals from local civil society organisations to contribute towards its Kenya hotspot program, dubbed the 'NIA' program, a Swahili word for 'intention' or 'purpose' and an acronym for 'Not Invisible Anymore'. The program seeks to combat exploitative and abusive child domestic work, which refers to children's work in the domestic work sector in the home of a third party or employer. The overall goal of the program is to create an empowered collective of child domestic workers, their allies, civic organisations and government institutions with strengthened capacity to transition communities away from child domestic work (CDW) and to protect children in domestic work from abuse and exploitation.

The NIA program will prioritise working with the most vulnerable children with lived experience of child domestic work, and those at risk of engaging in child domestic work. This includes children who are orphaned, child mothers, adolescents in educational transition, and children in female-headed households. The hotspot strategy will focus on strengthening child-centred advocacy on domestic work, strengthening and broadening the reach of survivor-centred services for children in domestic work and child survivors of domestic work, increasing economic resilience amongst at-risk households and communities and strengthening the policy framework and implementation (Please see Annex 1 for the full hotspot strategy). The programmatic focus will be in Nairobi, Kisumu, Busia and Kakamega for the initial 3 year implementation period.

We are initially seeking proposals for three-year projects that align with our strategy for combating exploitative child domestic work (Annex 1). Applicants may focus their project interventions in 4 geographical areas: **Nairobi, Kisumu, Busia and Kakamega**. Proposals may focus on one, or multiple of these areas.

*This document contains an overview of the Freedom Fund open application process and expectations for proposal submissions. Annex 1 provides a detailed description of the NIA Program strategy. Applicants will be expected to show how their proposal contributes to the program strategy, whilst also outlining their experience, expertise and analysis of the interventions most needed.*

#### A. Overview of the Freedom Fund

The [Freedom Fund](#) is a leader in the global movement to end modern slavery. It:

- **invests** in those countries and sectors with the greatest incidence of slavery.
- **analyses** which interventions work best and **shares** that knowledge.
- **brings together** a community of activists committed to ending slavery and empowered by the knowledge of how best to do so.
- **generates** funding by demonstrating how effective interventions can protect those at risk of being enslaved and free those in slavery.

We work in 11 countries through a clustered investment hotspot model, identifying and championing organisations that work with impacted communities to eradicate modern slavery. In South Asia, Southeast Asia, South America and East and West Africa, we fund initiatives that address unsafe migration, commercial sexual exploitation of children, forced labour, bonded labour and child labour. One significant area of work for us, within the larger child labour space, is Child Domestic Work – we support work to improve conditions for children in domestic work and address domestic servitude in Ethiopia and now in Kenya and are in the early stages of this support in Nigeria and Liberia.

## B. Planning your proposal

We expect applicants to undergo a process of proposal planning, and encourage you to consider the following principles and best practice:

### 1. Strategic relevance:

Discuss and assess if the strategic focus of the RFP fits the long-term strategy and expertise of your organisation. If it does fit, please consider which of the NIA program objectives are most relevant to your organisation strategy and expertise and design your project proposal accordingly. You do not need to include all 4 program objectives in your proposal – you may focus on those you think most relevant to your organisational strengths. You may also expand on what we have included in the strategy in your proposal if you have different ideas on how exploitative and abusive child domestic work can be tackled most effectively.

If the focus of the RFP is not a fit, it may be that developing a project proposal is not the best strategic option for your organisation.

### 2. Community consultation:

If the strategy, as described in Annex 1, matches the long-term strategy and expertise of your organisation, we invite you to consult with affected communities, including current and former child domestic workers, to collect their views about the relevance of your proposed approach. You can decide on the best way to lead these consultations. Please note that in the application form, you will be required to describe what you have done to consult with communities and explain how their views are reflected in the proposal.

## C. Application Process & Guidelines

Applications will be considered complete and will be reviewed when the organisation has submitted the following materials.

- Completed Grant Application (Please see attached Grant Application Template).
- Details of TWO referees from previous/current funders (Please include these in section 6 of the grant application).
- Completed Organisation Information Form (Please see attached Organisation Information Template. You are only required to provide information if something has changed - see sections highlighted in yellow. Otherwise, the information you already submitted is sufficient).
- Completed Project Budget (Please see attached Excel Project Budget Template).
- Due diligence self-assessment checklist (Annex 2)
- Safeguarding and General Risk Assessment

**Please find the RFP pack [linked here](#) with all the required forms to complete your application.**

### Due diligence:

All organisations are required to meet our mandatory due diligence standards to receive funding.

All applicants first submit a due diligence self-assessment at the application stage, which allows them to evaluate themselves against our standards and identify where there might be gaps. For successful applicants

whose applications are taken forward to the second stage, the Freedom Fund will do its own comprehensive on-site due diligence assessment, which is led by an independent consultant.

Although all our mandatory standards must ultimately be met, if compliance gaps are found during the on-site due diligence assessment the Freedom Fund may decide to work with the organisation to strengthen capacity in the identified areas. Organisations will be contractually required to meet all standards within a specified time frame and will be asked to provide regular progress reports. Sufficient resources (human or financial, from either FF or organisation) must be available to implement corrective action.

#### **Office of Foreign Asset Control (OFAC):**

In accordance with the Freedom Fund's Aid Diversion policy, sanctions / OFAC (Office of Foreign Asset Control) checks are run on all Freedom Fund partners, technical assistance providers, consultants and suppliers. The primary reason for conducting checks is to detect any risk of Freedom Fund funds being diverted to terrorist groups or sanctions targets, and risk that Freedom Fund may otherwise breach counter-terrorism laws or sanctions regulations. On occasion, these checks may also identify other 'flags' that require our attention, e.g. alerts relating to safeguarding, governance, financial operations/fraud etc. If necessary, such alerts may require further investigation/clarity before an agreement can proceed. If you have any concerns about the checks or their purpose, please let the Freedom Fund know.

#### **D. Deadline and submission information**

Please submit your full grant application by **30 June 2023** via email to [kenya@freedomfund.org](mailto:kenya@freedomfund.org) and [shicks@freedomfund.org](mailto:shicks@freedomfund.org).

#### **E. Project Duration and Budget**

- The Freedom Fund is accepting proposals for **36 month projects for the period of 1 October 2023 to 30 September 2026**.
- Applicants may focus their project interventions in any of the 4 geographical areas: **Nairobi, Kisumu, Busia and Kakamega**. Proposals may focus their project interventions in one, or multiple of these geographical areas.
- **Applicants' grant funding request must be between US\$75,000 and US\$250,000**. Please note that the Freedom Fund's preference is that the requested annual project budgets should be no more than one-third of the organisation's total annual operating budget of the previous fiscal year. If the project you would like to undertake requires an annual budget larger than one-third of the organisation's previous operating budget, please discuss this with a representative of the Freedom Fund before preparing your application.
- **Please find the RFP pack [linked here](#) with all the required forms to complete your application.**

#### **F. Benefits and Responsibilities of Freedom Fund Partnership**

The Freedom Fund seeks to create opportunities for partner organisations to engage with other organisations and funders at the national and international level, share in cross-learning with fellow grantees and ensure that regional and global policies are informed by partners' experiences.

As a Freedom Fund grantee, partner organisations also have certain responsibilities. Applicants should take these into consideration when developing the proposed project budget, allocating funds to allow participation in these activities:

- Participation in and contribution to program and organisational capacity building, coordination, and learning through workshops, meetings, and events organised by the Freedom Fund. Typically, there are at least two such meetings per quarter. Often for these meetings, two staff members may join

- in, so please take this into account when preparing your budget.
- Collaboration with other grantees in the program. This collaboration may include sharing information, tools, and other resources; participating in exposure visits; and furthering the development of a robust community of practice.
- Collaboration with the Freedom Fund's associated organisations, including academic institutions, to participate in data collection, research, and/or program evaluations.
- Participation in organisation site visits. We reserve the right to send staff or consultants, the Freedom Fund's donors, or other representatives to monitor progress or conduct due diligence on the project, as part of our risk management policy, with prior arrangement with the organisation.
- Participation in independent audits commissioned by the donor to verify and validate project expenditure.
- Submission of financial, narrative and impact reports on a quarterly basis.

## G. Project Review and Granting Timelines

After receiving your organisation's completed application, it will be reviewed and assessed, considering the proposal's strength and alignment with the Freedom Fund priorities and strategies. Funding is dependent upon the strength of your project proposal as well as past project performance.

**Selection:** Review of the application and visits to the organisation will inform selection of implementing partners. The below criteria will be taken into account as applicants are assessed and selected:

- **Project Context:** The proposal shows clear understanding of the social, economic and political environment of the planned project. The current conditions in the local environment are favourable for the project's implementation. If unfavourable conditions exist the organisation has planned adequate steps to mitigate risk and support the project's success.
- **Project Relevance:** The proposal addresses the root causes of the problem. It should demonstrate a clear understanding of the problem and have a good explanation of how the project will lead to change.
- **Project Design:** The project proposal is clearly described with a logical structure. Activities, outputs, outcomes, and impact are clearly defined, measurable, and realistic. The timeline, budget, targets, and project narrative are coherent. The group of target beneficiaries is achievable and appropriate in relation to the proposed activities. The project design reflects best practices.
- **Programmatic experience:** The organisation has previous experience implementing projects with a similar theme, design and scale. It also has experience and a positive community presence in the location. This adequately prepares it to accomplish the specific project goals. Preference will be given to those organisations who have implemented projects relevant to anti-slavery programming.
- **Proactivity and commitment:** The organisation is responsive and active, responding to project proposal queries. The organisation puts forth due effort throughout the proposal submission and review process. The organisation is proactive and committed to their work.

## H. Proposal Development Timeline

1. **Proposal Q&A workshop:** A Q&A workshop for queries related to your applications will be held at the beginning of June (date TBC)
2. **Proposal submission deadline:** The deadline for submissions of grant applications is **30 June 2023**.

3. **Proposal review:** The first review of proposals will take place in July. Applicants will be informed by **31 July 2023** at the latest if their application will be taken forward to the next stage.
4. **Program Co-Creation Workshop:** Successful applicants will be invited to a co-creation workshop that will be held in August (date TBC). This will be an opportunity for successful applicants to discuss their project plans with the other applicants and identify where collaboration may be possible and appropriate. It will also be an opportunity, if need be, to reflect on the project proposals and make revisions where necessary.
5. **Proposal development:** Following the co-creation workshop, successful applicants will have up to 3 weeks in **August 2023** to revise and develop their proposals, with support from the Freedom Fund team.
6. **Due Diligence:** Formal due diligence assessments led by our Financial Technical Advisor will take place in **August/September 2023** for all successful applicants. We will be in touch individually with each applicant to coordinate dates. At this stage, all applicants will be required to undergo OFAC and reference checks.
7. **Application Review:** Following the proposal development stage, the Freedom Fund will do a final review of grant applications and seek additional clarifications as needed.
8. **Funding Decision:** The Freedom Fund will inform you by **15 Sept 2023** if your grant application has been successful.
9. **Contracting:** Once a funding decision has been reached, contracting with successful applications will begin. This will involve a back-and-forth process with organisations as the contracts are drafted and countersigned.

## Annex 1

### Kenya Hotspot Strategy and Intervention Focus

#### Program Objectives, Outcomes & Outputs

**Impact:** No child is exploited and/ or abused while carrying out domestic work in third party households.

**Program Goal:** To create an empowered collective of children in domestic work, their allies, civic organisations, and government institutions with strengthened capacity to transition communities away from CDW and to protect children in domestic work from abuse and exploitation.

**Program intervention areas:** The current geographic focus is on Nairobi, Kisumu, Busia and Kakamega for the initial 3-year implementation period.

To achieve this goal, the program has the following objectives:

1. Strengthen child-centred advocacy on child domestic work.
2. Increase the reach of child and survivor-centred services for CDWs and former CDWs.
3. Increase economic resilience of at-risk communities and households in CDW source and destination areas.
4. Strengthen the policy framework and implementation.

## Objective 1: Strengthen child-centred advocacy<sup>1</sup> on child domestic work

The right of children to participate in decisions affecting their lives is enshrined in the UN Convention on the Rights of the Child and in ILO Convention No. 182. The NIA program will be keen to engender a rights-holder-led/child-led, child-centric approach, meant to change adult perceptions of children as passive victims of child labour, abuse, and violence and building an understanding of them as equal citizens and individuals capable of analysing and responding to their situations and problems.

<b>OBJECTIVE 1: Strengthen child-centred advocacy on child domestic work.</b>		
<b>Outcomes</b>	<b>Potential activities – October 2023 to September 2026</b>	<b>Example target definitions</b>
1.1. Children in domestic work, child survivors and at-risk children have united within groups, recognised their own knowledge and power, and lead in advocacy to address child domestic exploitation	<p>1.1.1 <u>Form groups of children in domestic work, child survivors and at-risk children and equip them with essential knowledge and life skills (Ambassadors of Change):</u></p> <ul style="list-style-type: none"> <li>● Provide training in life skills such as problem solving, communication skills, decision-making, creative thinking, interpersonal relationship skills, self-awareness building skills, empathy and coping with stress skills.</li> <li>● Provide leadership skills training to CDWs especially capacity for self-reflection and self-determination; ability to run group activities and make plans.</li> <li>● Enable participants to internalise beliefs about their rights, be able to challenge harmful social and cultural norms, and have the knowledge of how to use accessible channels for reporting violations.</li> <li>● Develop child-led county-wide networks (or strengthen existing ones) to link with local groups and to include children in domestic work in their agenda.</li> <li>● Arrange mentorship and further training of emerging leaders from these groups, as change makers.</li> </ul>	<p><i># of groups of CDWs, survivors and at-risk children supported</i></p> <p><i># of members of groups of CDWs, survivors and at-risk children supported</i></p> <p><i># of CDWs, survivors and at-risk children trained in life and leadership skills</i></p> <p><i># of participants that demonstrate improved knowledge of rights, and greater willingness and knowledge of how to report on exploitative work. (Shown in pre- and post-test or OB statements with number of cases reported)</i></p> <p><i># of reports on exploitation or other violations submitted through appropriate channels.</i></p> <p><i># of child-led county-wide networks supported</i></p> <p><i># of CDWs that become emerging leaders following mentorship and training</i></p> <p><i>Qualitative reporting of CDWs participation in these county-wide networks.</i></p>
	<p>1.1.2 <u>Create adult groups, including parents of children in DW or at risk, and adult domestic workers so that they can explore together the issues</u></p>	<p><i># of adult groups supported</i></p> <p><i># of members of adult groups supported</i></p>

<sup>1</sup> Child-centred advocacy in this context is understood to mean any activity intended to raise consciousness about child domestic workers among decision-makers or the public, especially among employers and child domestics themselves.

	<p><u>faced by children, the importance of education and improved schools as well as what they can do about their own economic resilience.</u></p> <ul style="list-style-type: none"> <li>● Engage parents in schools and provide training on child rights &amp; protection</li> <li>● Training to adult domestic workers through their unions on child rights &amp; protection</li> <li>● Provide support and encouragement for local groups of CDWs/children at risk, and helping them reach the officials with whom they want to engage</li> </ul>	<p><i># of parents who attended training on child rights and protection</i></p> <p><i># of adult domestic workers who attended training on child rights and protection</i></p> <p><i># of parents/guardians/caregivers of CDWs and at-risk children and adult domestic workers that demonstrate improved knowledge of rights, and greater willingness and knowledge of how to report on exploitative work.</i></p>
	<p>1.1.3 <u>Promote social inclusion of children in domestic work, and survivors in schools and communities:</u></p> <ul style="list-style-type: none"> <li>● Hold events and develop activities to raise affirmative awareness on child domestic work within schools.</li> <li>● Ensure inclusion of CDWs and survivors within Children’s Parliaments and Assemblies<sup>2</sup></li> </ul>	<p><i># outreach events to raise awareness on CDW in schools</i></p> <p><i># participants participating in outreaches</i></p> <p><i># Children’s Parliaments and Assemblies ensuring equitable inclusion and participation of CDWs.</i></p>
<p>1.2. Improved public attitudes and household behaviour towards child domestic work</p>	<p>1.2.1 <u>Promote a behaviour change campaign directed at employers and the wider public</u> (strategies and approach to be determined). This will promote empathy, respect and awareness of harmful aspects of CDW. It will include awareness-raising and advocacy to transform social attitudes and to address the widespread acceptance of child labour in domestic work and the beliefs amongst employers and parents that these situations represent a protective and healthy environment for children – especially girls.</p>	<p><i>Pre- and post-test measures of employers’ attitudes and likely behaviours, who have been exposed to the campaign</i></p>

**Objective 2: Increase the reach of child and survivor-centred<sup>3</sup> service provision for CDWs and former CDWs**

Children in domestic work 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.

<sup>2</sup> The Kenyan Children Assembly allows children (7-17yrs) to exercise their civic duties in Kenya. The children’s assembly is an institution where children gather to participate in decision making, policy formulae, planning and implementation of child affected activities and issues affecting them.

<sup>3</sup> A survivor-centered approach seeks to empower survivors by prioritizing their rights, safety, well-being, needs and wishes. Organizations must ensure that survivors have access to appropriate, accessible and good quality services. The principle of “do no harm” is at the heart of the survivor-centered approach.

The Freedom Fund’s formative assessment showed that prevention and reporting services were the most common service offered in the counties assessed, followed by vocational skills training, rescue services and safe shelters. Other services such as medical care, legal assistance, psychiatric or counselling services, housing, food distribution, and education services do exist, but they are frequently not accessible to children in domestic work and are not adequately suited for them.

<b>OBJECTIVE 2: Increase the reach of child centred and survivor-centred services for CDWs and former CDWs</b>		
<b>Outcomes</b>	<b>Potential activities – October 2023 to September 2026</b>	<b>Example target definitions</b>
2.1 Services for CDW and former CDW are expanded, more comprehensive and better coordinated.	<p>2.1.1 <u>Identify and map the services provided in each intervention area, and support new or expanded services to address the main gaps in assistance.</u></p> <ul style="list-style-type: none"> <li>● Scope out the available services provided by government and civil society, identifying their ability to reach to potential participants.</li> <li>● Guided by CDW and former CDW, identify the most important gaps to be addressed, based on the limits of funding.</li> <li>● Determine whether the interventions could or should be provided by statutory bodies – identify (lobby) how they can be planned and budgeted for by government.</li> <li>● Determine whether the interventions could be provided by civil society partners – lobby to allocate the required funds.</li> <li>● Develop and document the package of services for CDW and former CDWs in each target area, as comprehensively as possible.</li> </ul>	<p><i># of intervention areas where scoping of available services and planning are completed.</i></p> <p><i># of intervention areas where a comprehensive package of services is being implemented, based on CDW/former CDW inputs.</i></p> <p><i>Additional targets for specific services, within partner workplans – demonstrating that CDW and survivors of abuse and exploitation have improved access to specialised services for their rehabilitation and reintegration.</i></p>
	<p>2.1.2 <u>In each intervention area – and across the hotspot – ensure coordination between service providers, for efficient delivery.</u></p> <ul style="list-style-type: none"> <li>● Set up an operational inter-sectoral/inter-partner coordination network that brings together all stakeholders in the child protection space in the intervention areas.</li> <li>● Identify roles and responsibilities as well as agreed referral channels between organisations and agencies.</li> </ul>	<p><i># coordination networks functioning effectively within intervention areas, where roles, responsibilities and clear referral procedures have been agreed.</i></p>



<p>2.2 Government and civil society services for CDW are more child- and survivor-centred.</p>	<p>2.2.1 <u>Train the organisations in each area in trauma-informed and survivor-centred approaches for providing their services</u></p> <ul style="list-style-type: none"> <li>Partner with relevant organisations and with CDW/former CDW to identify required content for training of service providers.</li> <li>Prepare and provide a program of training for frontline workers in identifying CDWs who are especially at-risk, arranging child-centred and trauma-informed services, and use of the evidence to advocate for rights for CDWs.</li> </ul>	<p># training programs designed</p> <p># frontline service providers trained</p> <p># of participants showing significant increase in child/survivor centric knowledge, attitudes and practices as a result of training (measured through training evaluations)</p> <p># of service users (CDWs and former CDWs) reporting high levels of respect and dignity when receiving services from participating agencies.</p>
<p>2.3 Investigations of abuse and exploitation of CDWs by law enforcement officials are more child-centred and more successful in providing justice to survivors</p>	<p>2.3.1 <u>Train law enforcement officials in the target areas on improved investigation and response:</u></p> <ul style="list-style-type: none"> <li>Design training for law enforcement officials, regarding human rights of CDWs, legislation on child labour and domestic work, and on effective community policing approaches, identification, investigation and prosecution methods, based on insights from survivors, if possible.</li> </ul>	<p># of law enforcement officials trained</p> <p># of workshops with law enforcers held</p> <p>Qualitative feedback from survivors on experiences of support by law enforcement in their protection and access to justice.</p>
	<p>2.3.2 <u>Ensure collaboration between law enforcement, civil society groups and CDWs:</u></p> <ul style="list-style-type: none"> <li>Hold workshops between law enforcement and NGOs to develop joint action plans.</li> <li>Re-activate and sustain community policing initiatives including cohesion of community structures with law enforcement agencies that prioritise CDW issues.</li> </ul>	<p># of workshops between law enforcement and NGOs held</p> <p># joint action plans finalised between civil society groups and law enforcement.</p> <p>#of locations with functional community policing initiatives, with a focus on CDW issues.</p>

**Objective 3: Increase economic resilience of at-risk communities and households in CDW source and destination areas.**

The formative assessment found that some CDWs choose to enter domestic work in pursuit of a better lifestyle or opportunities. However, more typically, children become CDWs through push factors linked to their vulnerabilities. The most frequently reported push factors were poverty (including the need to raise school fees), large numbers of siblings, lower education level of the head of household and poor performance in formal education. Of these, poverty was the most discussed, where the CDWs reported several manifestations with lack of a reliable source of income being the most common.

**OBJECTIVE 3: Increase economic resilience of at-risk communities and households in CDW source and destination areas**

Outcome	Potential activities – Oct 2023 – Sept 2026	Example target definitions
<p>3.1 At-risk communities and households have increased economic resilience and are less likely to let their children go into domestic work.</p>	<p>3.1.1 <u>Bring together parents, guardians and other caring adults as a community support group for the CDWs and other children who are advocating for their rights.</u></p> <ul style="list-style-type: none"> <li>● Enable the groups to gather hyperlocal data on issues faced by children, challenges to their education, economic challenges to families etc. Enable groups to formulate their actions and priorities, including bringing collective recommendations to the authorities.</li> <li>● Help group members to participate in the positive parenting curriculum and seek its wider adoption by county government.</li> <li>● Enable children’s groups to bring their issues and ideas to these adult groups, for encouragement and help with connections.</li> </ul>	<p># of community support groups supported</p> <p># of active community support group members</p> <p># adults completing the positive parenting curriculum</p>
	<p>3.1.2 <u>Promote access to sustainable earned income for households:</u></p> <ul style="list-style-type: none"> <li>● (As noted under Objective 1) Facilitate access to regulated micro-finance institutions or bank loans for small businesses.</li> <li>● Enable households to access expertise and other resources for their micro-enterprises.</li> <li>● Seek out referral channels to statutory and voluntary programs of community-based investment in sustainable livelihoods in the targeted locations.</li> </ul>	<p># of individuals gaining access to new income</p> <p># households participating in sustainable economic empowerment initiatives</p>
	<p>3.1.3 <u>Facilitate households’ access to financial assistance and social protection programmes.</u></p> <ul style="list-style-type: none"> <li>● Enable participating households to apply for conditional cash transfer programs, pensions, and social health insurance.</li> <li>● Provide financial literacy programmes for the households.</li> </ul>	<p># of individuals gaining access to government social protection schemes.</p> <p># of individuals participating in financial literacy courses/programmes</p>
	<p>3.1.4 <u>Link CDWs and children at high risk of exploitation (above 14 years) to vocational training programs and safe employment support, within the local area.</u> Access various appropriate skills training programs, including conducting trainings using the Home Care Management curriculum, so that older adolescents and young workers can access a professional approach to domestic work.</p>	<p># of adolescents completing vocational training</p> <p># of adolescents accessing safe and legal employment</p>

**Objective 4: Strengthen policy framework and implementation.**

Child domestic work is not simply a labour, children’s rights or gender issue. It relates to a range of policy areas such as legislative action and enforcement, social protection, education, vocational training, labour markets, health, and social norms, amongst other things. Child domestic work is not simply of concern to the children, their families and communities, but is also pertinent to wider national development agendas and plans, including poverty reduction and decisions concerning budgetary resource allocations.

To its credit the Kenyan Government has developed and implemented several policies to address the issue of child labour. 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 still requires ratification. 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 means in practice with no guidance specific to child domestic work. There are also contradictions between the Basic Education Act (2013) and the Employment Act (2007) that require attention.

Enforcement of the legal frameworks falls within the remits of the Ministry of Labour, Social Security and Services, the National Police Service, and the Office of the Director of Public Prosecutions. The Child Labour Division, which is within the Ministry of labour, has the responsibility for activities to eliminate child labour, coordination of services provided to children, and ensuring that child protection activities are implemented countrywide. The Department of Children’s Services was also identified as a viable starting point in the Freedom Fund’s research, which can later link to other government departments and gain support of other government agencies, police etc.

Objective 4: Strengthen the policy framework and Implementation		
Outcomes	Potential activities – Sept 2023 – Oct 2026	Example target definitions
4.1 National guidelines and regulations are issued in order to more clearly and coherently define responsibilities to protect child domestic workers.	4.1.1 <u>Work to identify and clarify legal inconsistencies between the Children Act and the Employment Act and the Regulation of Wages and Conditions of Employment Act with regard to any legal employment of children under 18:</u> Obtain legal advice and build legal consensus about which legal reference should be followed by stakeholders when dealing with children working.	<i>Report agreed and issued by legal experts on legal guidance to be followed with regard to inconsistent laws.</i>
	4.1.2 <u>Work with Labour and Social Protection Ministry to issue guidelines to regulate any permitted work by children of different ages:</u> <ul style="list-style-type: none"> <li>• Enable partner NGOs and child-led advocacy with the Dept of Children’s Services in order to develop and issue national guidelines to law enforcement and County/Sub-County Children’s Offices about legal and permissible terms and conditions of work for children of different ages (e.g. Under 14 years; 14 – 15 years; 16 – 17 years).</li> <li>• Consider the feasibility for permissible employment of older children being undertaken only with formal registration of the child/household/employer with the appropriate authority, so that the child’s conditions can be inspected within the household, and the child informed about statutory channels for assistance.</li> </ul>	<i># of national guidelines issued on permissible terms and conditions for children of different ages and defining the specific responsibilities for enforcement.</i>  <i># of national regulations issued requiring registration of child workers, to facilitate inspection. This can</i>

	<ul style="list-style-type: none"> <li>● Ensure that the specific protection responsibilities of law enforcement, labour officials and Children’s Offices for CDWs are clearly defined, and the officials are notified.</li> <li>● Lobby for domestication of convention 189 &amp; 190. must also take steps to incorporate the provisions of the convention into its domestic laws, policies, and practices, to ensure that the convention's standards are upheld and enforced at the national level.</li> </ul>	<p><i>be piloted in at least two counties</i></p> <p><i>#new laws or amendments to existing laws that are consistent with the provisions of the convention.</i></p>
<p>4.2 Government-led <b>structures</b> at national, county and sub-county levels have enabled active coordination between stakeholders to protect child domestic workers.</p>	<p>4.2.1 <u>Arrange regular coordination meetings at national, county, sub-county level between key government officials with responsibilities for child protection and representatives of children’s groups, community support groups and NGOs</u></p> <ul style="list-style-type: none"> <li>● In locations where the supported partners are active, support these coordination meetings to take place, and integrate this with community policing initiatives (Nyumba Kumi), with involvement of village elders and area chiefs.</li> <li>● Ensure connection and regular reporting to County and Sub-County Children Offices</li> <li>● Enable these coordination meetings to undertake action planning to enhance access to education and vigilance for protection of CDWs, as well as having capacity for emergency response to children in situations of exploitation.</li> <li>● Help village-based groups to promote child-centred education, especially ensuring integration of children from low-income families.</li> <li>● Provide relevant trainings and tools for child- and survivor-centred assistance by responsible officials, as appropriate.</li> <li>● Ensure that the needs of CDWs are appropriately reflected within County Integrated Development Plans, with sufficient budget and staffing allocation.</li> </ul> <p>4.2.2 <u>Arrange participation by partners and children’s representatives in national coordination bodies for child protection</u></p> <ul style="list-style-type: none"> <li>● Ensure that CDW and former CDW priorities are regularly heard at the national level</li> <li>● Ensure that emerging models, results and good practices from the hotspot areas are articulated and shared, and the scope for scale up with national support is identified.</li> </ul>	<p><i># of active national, county &amp; sub-county coordination bodies for child protection.</i></p> <p><i># of officials trained in child/survivor centred assistance.</i></p> <p><i># of counties with CDWs properly included in CIDPs (County Integrated Development Plans).</i></p> <p><i>National coordination body for child protection regularly listens to CDW priorities.</i></p>

<p>4.3 Systems and tools for <b>data collection and statistical analysis</b> on child domestic work have been improved and used.</p>	<p>4.3.1 <u>Review and seek improvements in the structure and use of the Children Protection Information Management System (CPIMS) and other data systems related to CDW</u></p> <ul style="list-style-type: none"> <li>● Analyse the contents, indicators and scope of CPIMS, identifying ways to improve how it monitors protection of CDWs and former CDWs.</li> <li>● Analyse strengths and weaknesses in how it is used by stakeholders with relevant responsibilities.</li> <li>● Review the use of statistical data available through this system.</li> <li>● Develop any required new tools to supplement existing government data captured on CDW.</li> <li>● Engage with the County Integrated Development Plan national management team, to ensure inclusion of child labour/CDW indicators in CIDP3.</li> <li>● Arrange training for statutory and voluntary staff on data collection and case management systems – promoting effective use of enhanced digital systems.</li> <li>● Ensure maximum use of learning from Kenya’s 2023 Child Labour Survey.</li> </ul>	<p><i>Listing of improvements made in CPIMS and improved use of CPIMS</i></p> <p><i>Inclusion of CDW indicators in CIDP3</i></p> <p><i># of officials and NGO staff trained in CDW data collection and case management systems</i></p>
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