

CHILD LABOR REMEDIATION IN THE US: STAKEHOLDER MAPPING & ENGAGEMENT

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PREPARED BY

THE CENTRE
FOR CHILD RIGHTS AND BUSINESS

PRESENTED FOR

 **AIMprogress**

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1. EXECUTIVE SUMMARY

AIM-Progress and its members commissioned The Centre for Child Rights and Business (The Centre) to map and engage stakeholders that can support child labor remediation (CLR) processes in the US. In addition, a child labor remediation framework was developed.

The mapping included a desktop child labor risk analysis of 13 states and counties. After consultations with AIM-Progress, the list of potential sites was narrowed down to seven communities in Northwestern Indiana and Southwestern Minnesota, which were selected for further outreach.

A total of 100 local civil society organizations (CSOs) with service provisions in these locations were mapped, and 74 organizations were contacted to learn more about their specific programs, target groups, and organizations. The response to the initial email contact was minimal, but several reminders and follow-up calls enabled us to meet and engage with 21 organizations and agencies, either online or in person.

Between May 5-10, 2025, two staff members from The Centre travelled to selected communities in Indiana and Minnesota to hold stakeholder meetings and consultations with local CSOs and child protection service organizations.

The mapping and engagement, which not only covered available service provision but also included discussions about child labor risks, migration patterns, etc., revealed the following:

- Seven key civil society organizations in five locations are well-suited to serve as the primary child labor remediation partner should child labor be suspected or confirmed in these areas.
- In addition to the seven key organizations, there are specialized organizations that can support various components in tentative remediation processes, e.g., access to emergency shelter, legal aid, and education.
- None of the organizations we met with has had previous experience in child labor remediation; as this has not been done before, despite identified high-profile cases and available services that can be used to support vulnerable children and youth.
- Child labor risks are high, and there are accounts of children working in agriculture as well as in manufacturing. However, none of the organizations we met with currently engage systematically with these children, simply because they have other priority areas and do not necessarily know what to do or which partners to involve for child labor remediation.
- Child labor risks in these communities are linked to several contextual risks, which include low-paying jobs, lack of housing, persistent drug abuse, groups of migrant workers who fear deportation, lack of child care, and support organizations facing declining funds from the federal and state levels.

The recommendations for next steps include:

01

Appointing a coordinating entity to serve as the main focal point for AIM-Progress members and selected organizations. The organizations, in their current form, lack the capacity to respond quickly and accurately to various companies regarding child labor suspicions and cases. Many of them also lack experience in working directly with the business sector and understanding the implications for confidentiality.

02

Providing training on child labor remediation to the selected partners: Most, if not all, do not have any experience or knowledge about child labor remediation processes as described in Human Rights Due Diligence frameworks.

03

Compiling a roster of specialized support organizations offering legal aid, education, and other services.

04

Formalizing a child labor remediation network with clear Terms of Reference and confidentiality agreements for involved partners.

2. INTRODUCTION AND METHODOLOGY

This chapter presents the project and the methodology used to identify project sites and local stakeholders, as well as to carry out the mapping and engagement.

2.1. INTRODUCTION

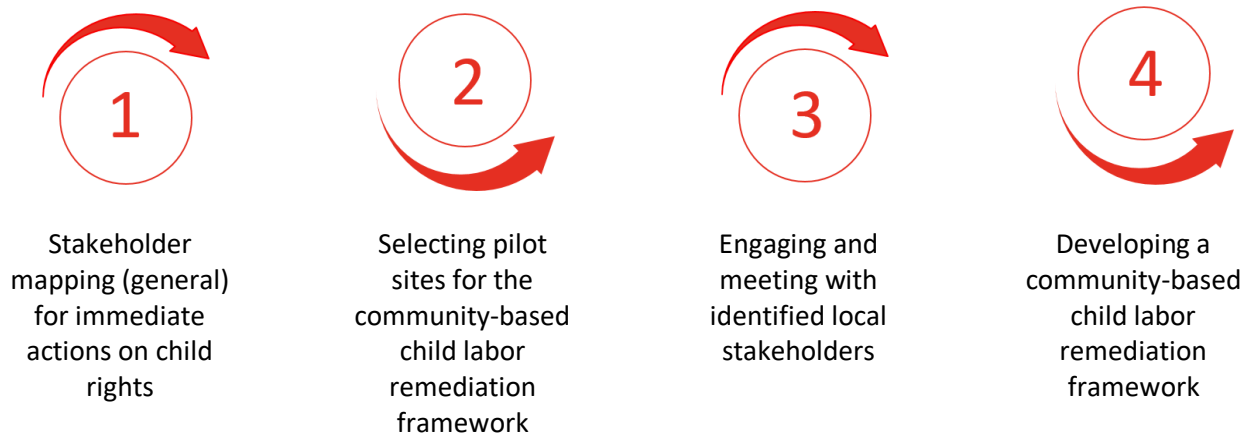
This project stems from the 88% increase in child labor cases identified by the US Department of Labor (US DOL) in the United States from 2019 to 2023¹. While the child labor cases have led to several business consequences for the involved companies, the child rights perspective and access to proper child labor remediation for the impacted children have been notably absent.

AIM-Progress commissioned The Centre for Child Rights and Business (The Centre) to develop a child labor remediation (CLR) framework and identify suitable partners to support local child labor remediation efforts in the US. This report summarizes the findings of the stakeholder mapping and engagement in Indiana (IN) and Minnesota (MN) between March and May 2025. It should be read in conjunction with the presentation of the proposed child labor remediation framework (see the enclosed PDF “Child Labor Remediation Framework for the US”).

Although this report focuses on six communities in rural Indiana and Minnesota, we believe the lessons learned, identified gaps, and suggested next steps are broadly applicable across the country.

2.2. KEY PROJECT STEPS AND METHODOLOGY

This project has included several steps:



This report focuses on the results of stakeholder engagement in Step 3, but it will also present the key information shared in members' calls and emails regarding the preceding steps.

¹ For the increase in child labor violations identified by DOL, see [here](#).

The following main activities were undertaken during this project:

Step 1:

AIM-Progress shared a list of tentative pilot states. Based on this information, The Centre developed a risk matrix to better understand where the risks of child labor are highest. The suggested pilot sites were shared with AIM-Progress members and compared to their suppliers'/business locations list.

Step 2:

Indiana (IN) and Minnesota (MN) were chosen as the two pilot states. To further refine the selection of sites and communities, the business locations were assessed based on poverty levels, educational statistics, and the density of the migrant population. Consequently, the communities of Van Buren, IN, and Worthington, MN, were identified. However, considering the rural context and the limited presence of local civil society organizations in Van Buren, we broadened the scope to include additional counties and locations in Indiana, such as Logansport, Wabash, Huntington, Marion, and Fort Wayne. Nobles County and the city of Worthington were designated as the site in Minnesota. Nevertheless, the final list of resource organizations comprises entities outside these cities due to their relevance and relative proximity.

The members also suggested the state of Iowa, but no cities in Iowa (IA) were visited as the risks were deemed higher across the border in Worthington, MN. We also learned that due to a lack of support structures in Northwest Iowa, migrants residing in MN travel to IA for work.

Step 3:

Engagement with civil society organizations took place in March and April 2025. Eighty-one stakeholders in the selected locations were identified and shortlisted. Seventy-four stakeholders were contacted via email and phone to request online meetings prior to an in-person meeting. Only ten organizations responded positively to our meeting request, despite each stakeholder being contacted at least three times.

In the end, we interviewed 10 stakeholders via Zoom, and met 11 stakeholders in person during our travel to IN and MN from May 5 to 10, 2025. The stakeholder engagement followed an interview guideline to ensure we captured the necessary data. Notes from the conversations and interviews were taken and transcribed, forming the basis for this report.

The meetings included an introduction to The Centre and our services, an overview of what child labor remediation entails, and the fact that a group of companies commissioned us to carry out the mapping.

Step 4:

The suggested child labor framework (simplified version) is outlined in a separate report to AIM-Progress.

3. CHILD LABOR RISKS

This chapter provides information about child labor risks in the selected communities, based on publicly available information and The Centre’s on-site observations.

3.1. DEFINITION OF CHILD LABOR

According to the ILO, child labor “is work that deprives children of their childhood, their potential, and their dignity and that is harmful to physical and mental development”, and includes:

-  Work performed by children that is off-limits for their age
-  Hazardous work performed by anyone under the age of 18

The US Fair Labor Standards Act (FLSA) guidelines form the basis of federal child labor regulations. State laws may or may not follow federal law, but the more restrictive regulations should always take precedence, according to the Department of Labor. Indiana and Minnesota follow the federal regulation regarding the minimum age limit, which differs according to the context:

Table 1: Minimum age of employment according to FLSA, Indiana and Minnesota state laws

	NON-AGRICULTURAL EMPLOYMENT	AGRICULTURAL EMPLOYMENT
Basic min. age for full-time employment	16	16
Min. age for hazardous work	18	16
Min. age to start working outside school hours	14	12 (10 for hand harvesting)

The laws regulate not only the minimum age but also the maximum hours of work for minors. While working hours are almost unregulated in agricultural settings, they are regulated in non-agricultural settings. The table below for non-agricultural working hour restrictions shows that Minnesota has less restrictive regulations on child labor than Indiana.

Table 2: Hour restrictions on the employment of minors in non-agricultural settings according to FLSA, Indiana, and Minnesota laws

	WORKING HOUR RESTRICTION FOR 16–17-YEAR-OLDS		WORKING HOUR RESTRICTION FOR 14-15-YEAR-OLDS	
	When school is in session	When school is not in session	When school is in session	When school is not in session
Federal Law (FLSA)	Undefined	Undefined	Max. 3hrs/school days 8hrs/non-school days Max. 18hrs/week <i>Not before 7 am or after 7 pm</i>	Max. 8hrs/day 40hrs/week <i>Not before 7 am or after 9 pm</i>
Indiana Law	Max. 8hrs/day, or 9hrs/day not followed by a school day* 30 hrs/week, or 40hrs/school week* <i>Not before 6 am or after 10 pm</i> * parental permission	Max. 8hrs/day, or 9hrs/day not followed by a school day* 30 hrs/week, or 48hrs/non-school week <i>Not before 6 am or after midnight* on nights not followed by a school day</i> * parental permission	Max. 3hrs/day 18hrs/week <i>Not before 7 am or after 7 pm</i>	Max. 8hrs/day 40hrs/week <i>Not before 7 am or after 9 pm</i>
Minnesota Law	Undefined <i>Not before 5 am or after 11 pm</i>	Undefined	Max. 8hrs/day 40hrs/ week <i>Not before 7 am or after 9 pm</i> Less restrictive than FLSA	Max. 8hrs/day 40hrs/week <i>Not before 7 am or after 9 pm</i>

3.2. CHILD LABOR RISKS ACCORDING TO PUBLICLY AVAILABLE DATA

The risks associated with child labor depend on several factors, with poverty and economic hardship being the most significant. Most cases identified by the US DOL have included migrant children, including undocumented and unaccompanied minors. In this context, it should be noted that approximately 300,000 unaccompanied minors arrived in the US between 2021 and 2023. While the number of unaccompanied minors arriving in the US in recent months is low, many of these children are still in the US searching for work. Many of them also arrived at a very young age, thus still being below the minimum working age. However, it should be noted that

child labor is not solely an issue related to migrant children. Below is a table presenting key indicators that can be used to gauge the risk.

Table 3: Risk indicators relating to child labor risks

STATE/TOWN	THE POVERTY RATE FOR MINORS (2023)	RATE OF NO HIGH SCHOOL GRADUATION FOR 18- TO 24-YEAR-OLDS (2023)	FOREIGN-BORN RATE (2023)	# OF UN-ACCOMPANIED MINORS RELEASED TO SPONSORS IN FY2020-2025 ²	DOL CHILD LABOR VIOLATION COUNT (2022-2024) (PER 10,000)
State of Indiana	15.4%	13.8%	6.3%	7,823	0.78
Van Buren, IN	26.4%	5.9%	2.2%	0 (for Grant county)	0
State of Minnesota	10.1%	11.2%	8.6%	4,750	0.81
Worthington, MN	15.5%	22.0%	22.1%	415 (for Nobles county)	1.6³

3.3. IDENTIFIED CHILD LABOR RISKS IN SELECTED LOCAL COMMUNITIES

The meetings with stakeholders in Indiana and Minnesota paint a bleak picture of communities under financial strain, struggling with drug abuse, and support organizations facing cuts as federal funding is withdrawn. Several individuals we spoke with confirmed that children are working.



Everyone knows that there are kids working, and many are undocumented. We get a referral or get involved if a case is referred to us by law enforcement agencies or if a child has been injured. The challenge for us is that we get very few referrals.

Child protection services officer

Child labor was more pronounced in Worthington than in Indiana. One possible reason for this is that people in Worthington are more aware of child labor and what it entails, following the 2022 US DOL revelation⁴ that 22 underage children had been working night shifts performing sanitation work at the JBS meatpacking plant in Worthington.

We also noted that social services tend to view child labor primarily as a Department of Labor issue, rather than a child protection or child welfare issue. As a result, many organizations either do not understand or are not aware that their services could play a role in child labor remediation. In Chapter 4, we will explore how existing services could contribute to the child labor remediation process.

² For the number of unaccompanied minors the data of the last 5 years is extracted by county, see [here](#), and by state, see [here, since the minors who were released to sponsors 5 years ago may still be minors depending on the age of their first entry](#).

The populations of IN (6,924 million) and MN (5,793 million) are relatively close. Therefore, the numbers are not adjusted per capita.

³ See [here](#) for the rates of DOL identified child labor cases in Worthington.

⁴ [Ibid](#), 22 Child Labor cases were identified in Worthington by DOL.

Worthington and child labor

The fact that children were working in the sanitation shift at JBS was an open secret in the community. However, no one knew what to do, and many were afraid that involving law enforcement or the DOL would worsen the children's situation. So when the DOL eventually discovered the children, there was no support system in place to care for them. These children have since disappeared or gone into hiding, and several individuals said that it is common for youth to cross the border into Iowa to work on egg farms. It should also be noted that in 2024, the DOL identified nine children working night shifts at a pork processing plant in Sioux City, Iowa⁵. Sioux City is only 1.5-hour drive from Worthington, and we were told that informal labor agents operate in the city, actively recruiting children – primarily for farm work – and providing transportation to worksites for underage children.



I know several at school that are working the night shift at various locations; they come in, sleep through the morning classes. Everyone knows a man here in the community who picks up kids, even middle school kids, and takes them to work. They often do farmwork, including removing weed with a machete.

High school youth in Worthington

It should also be noted that none of the stakeholders we met with in Worthington were aware of whether and how the funds from the recent DOL settlement with JBS⁶ had been distributed to support the affected children.

Migration and changing demographics

The influx of unaccompanied minors to the selected communities has more or less ended in the last couple of months. Before, the community of Worthington (13,000 inhabitants), according to a representative from an NGO, the area could have “100 unaccompanied kids per month arriving, the official numbers are far too low and underreported”. The current data shows that 62% of the population in Worthington identifies as ‘non-white’, with Hispanics making up 43%. In 2010, the situation was reversed, with 67% of the population identifying as “white”. This rapid demographic shift has rendered several support structures inadequate or poorly aligned with current challenges.

In Indiana, we discussed the issue of Temporary Protection Status (TPS), including Employment Authorization for Haitians, which is set to end on August 3, 2025.

⁵ [Qvest LLC must pay \\$171K after federal investigators find sanitation contractor employed 11 children at Sioux City pork processing plant | U.S. Department of Labor](#)

⁶ [US Department of Labor secures agreement with JBS USA, nation’s largest meat packing processor, to address child labor compliance | U.S. Department of Labor](#)



No one knows how this will play out, I suppose their jobs will be backfilled with undocumented migrants.

A founder of a CSO working for migrants speaking about TPS removal of Haitian citizens

3.3.1. CONTEXTUAL RISKS THAT ARE IMPACTING CHILD LABOR

A range of interconnected circumstances and challenges all contribute to the prevalence and risks of child labor in the communities we visited. For information on how organizations and stakeholders tackle these challenges, please refer to Chapter 4.

- C Low income levels and the existence of working poor or “ALICES”:** Asset Limited, Income Constrained, and Employed (ALICE) individuals are common. In Indiana, a social organization reported that 50% or more of the people who turn to them for help (such as access to food pantries, assistance with paying for gas and electricity, etc.) are employed. However, they earn too little to support their families. Those working for meatpacking companies may earn relatively well, but it is not enough to sustain a family if they have children and only one source of income. Workers in manufacturing, for example, may earn just enough to be ineligible for the Supplemental Nutrition Assistance Program (SNAP), yet still struggle to meet their family’s basic needs.
- C Lack of child care:** This was one of the most frequently raised concerns. The shortage of child care options makes it difficult for both parents to work. As noted above, this has ripple effects on household income. We heard stories of desperate mothers searching Facebook for someone to watch their children so they could go to work.
- C Drug epidemic:** Methamphetamine use was mentioned repeatedly by organizations, especially in Indiana. Grandparents raising their grandchildren – because the parents are incarcerated or struggling with addiction – has become common⁷. These grandparents often rely on food pantries and thrift stores to meet basic needs.
- C Lack of funding for general support services or funding only targeting specific needs:** The broader support system is fragmented across agencies and organizations that focus on specific areas, such as refugee resettlement, domestic violence, housing insecurity, or child abuse and neglect. Because child labor can fall under multiple categories, it often slips through the cracks and goes unaddressed by any single agency.
- C No child labor-based programming:** None of the organizations The Centre contacted had programs explicitly focused on child labor. The concept was unfamiliar to most. Only after The Centre explained the specific vulnerabilities of children in such situations did some organizations begin to see connections with their existing services.
- C Lack of knowledge about child labor:** There is a general lack of awareness around what constitutes child labor and child trafficking. Local actors did not always accurately describe these issues.
- C Lack of awareness in the community about available support:** Many community members, especially migrants, are hesitant to seek help from organizations. They fear being registered or having their names recorded on documents. While a range of services exists, these are often underutilized due to limited community outreach and trust.

⁷ The week after we returned from the trip to MN and IN, the New York Times featured an article on this theme [My Parents Expected to Be Retired. Instead, They Are Raising My Sister’s Kids. – The New York Times](#)

- C Lack of access to safe, long-term shelters and housing:** One of the most frequently cited gaps is the lack of safe, mid-to-long-term housing for youth not under child protective oversight, since affordable housing options are not affordable enough for “ALICE” families and individuals.
- C Interconnectedness of improper shelter and risk of abuse:** CSOs have observed that youth without proper shelter are more vulnerable to exploitative relationships with adults, which can lead to abuse and sex trafficking. Teen pregnancies were frequently mentioned, particularly among girls living in overcrowded housing situations with minimal parental supervision due to long work hours.
- C Lack of decent work for youth:** One of the main underlying reasons for child labor violations is that youth under 18 who want to work struggle to find age-appropriate job opportunities. As a result, they often turn to informal farm work involving hidden child labor or use fake IDs to secure jobs in places with weak identity verification processes.

4. STAKEHOLDER MAPPING AND ENGAGEMENT

This chapter covers stakeholder engagement results in Indiana and Minnesota, including a general overview, local context, description of key organizations identified, how the state child protection services are organized, and the strengths and weaknesses in child labor remediation preparedness.

4.1. GENERAL OVERVIEW

Engaging with local stakeholders takes time and requires effort to build trust. Organizations such as child protection services at the regional level, migrant support organizations, churches, and social work organizations handle sensitive issues and have an obligation to protect the privacy of the people they serve. As a result, they are often cautious about sharing information. Many are also protective of their main “support area” (e.g., access to housing, refugee resettlement, youth development), due to intense competition for federal and state grant funding.

Furthermore, there are very few organizations with staff/offices across the country that can serve as a one-stop shop for all CLR cases. In each location (except Logansport), the most suitable organization was locally established and has no direct counterpart in other cities.

Despite these hurdles, we identified one key organization in each of the five main locations that is both suitable and willing to serve as the initial point of contact for any child labor remediation needs. These identified organizations also have flexible funding structures that allow them to respond to urgent child labor matters. Where appropriate, the selected organizations will refer cases to other organizations for relevant support.

Finally, although child labor risks in both states are similar, the organizational structure of child protection services varies in each state, which influences how responses are implemented. Therefore, we provide a summary of the stakeholder engagement based on the states.

4.2. INDIANA STAKEHOLDER ENGAGEMENT RESULT

Before presenting the results, it is important to highlight the local context. The area consists mainly of relatively small rural towns, a mix of large and smaller agricultural areas/farms, manufacturing industries, and an abundance of low-entry-level jobs, many of which are now filled by migrant workers. In some places, open xenophobia and racism persist, according to stakeholders. However, the influence of one strong, trusted local organization can be enough to shift people’s perceptions and slowly turn these towns into safe havens for migrants, as is evident in Logansport and Wabash. Logansport, for example, has a population of 18,233, including an estimated 2,000–3,000 Haitians, as well as large numbers of migrants from Mexico, Venezuela, and Guatemala.

4.2.1. IDENTIFIED ORGANIZATIONS

The organizations listed below have been identified as key organizations for child labor remediation in this part of Indiana. They are led by committed, solution-oriented staff and have a flexible funding structure, allowing them to respond to urgent and evolving needs. These organizations are well-respected in their communities and possess strong local networks. Importantly, they are committed to taking action even if that means connecting a child or family to other support providers when they cannot resolve the issue themselves (e.g., finding emergency shelter). All of these organizations agreed to be contact points in the event that child

labor is identified in their communities. In addition to these key organizations, several others specialize in areas such as providing shelter and education, etc.

Table 4: Key organizations identified in Indiana

SELECTED PARTNER ORGANIZATION	ORGANIZATION TYPE	SERVICE TYPE	LOCATION
Immigrant Connection	A non-profit organization that provides low-cost services, affiliated with a church. Part of the Immigrant Connection National Network of church-based immigration legal services offices	Legal services, a broad range of migrant support services	Logansport (main office), Marion city office and more than 30 branches across the US
Wabash County Diversity Coalition	A non-profit organization under the fiscal sponsorship of the Community Foundation of Wabash County	Migrant integration and support	Wabash County (office in North Manchester City)
United with Love	Non-profit organization with free services	Social services for families in need, including access to food, housing, and clothing	Huntington County and City
Amani Family Services	Private non-profit organization with free services	Comprehensive migrant services	Allen County, Fort Wayne City

Immigrant Connection, Logansport and Marion, IN: Immigrant Connection is a nonprofit organization that oversees a national network of Department of Justice (DOJ)-recognized immigration legal service offices. Their mission is twofold: to expand access to high-quality, low-cost immigration legal services and to foster community through welcoming programs designed for immigrant families. Their programs provide support related to immigration legal services, as well as offering citizenship classes, conversational English, immigrant family connection events, and tutoring for immigrant students. With 35 offices across 20 states, including Indiana, Minnesota, and Iowa, Immigrant Connection operates on a unique sustainability-through-service model. Rather than relying on external funding, Local IC Sites are supported through affordable legal fees (for example, \$40 for an initial consultation), which directly cover the salaries of site staff. Offices are hosted in partnership with churches, creating trusted, community-based locations. In addition to serving individuals and families, Immigrant Connection partners with schools and businesses, including meat processors and food manufacturers, to offer legal counseling on employment authorization and immigration status for their workforce. Their services are intentionally flexible and responsive, adapting to the unique needs of each community they serve.

Wabash County Diversity Coalition, North Manchester and Wabash, IN: The Coalition was founded on the belief that it benefits rural areas experiencing population decline to become welcoming destinations for all in order to thrive, keep schools open, and attract businesses and employees. The Coalition focuses on supporting all individuals, including new Americans, in the community by addressing everyday challenges and providing

guidance on available city and county services. They offer services such as bilingual community potlucks, bilingual programming and life navigation courses, entrepreneurship workshops in Spanish in partnership with the NiiC, and assistance to organizations in the areas of safety, education, and outreach. Their referral systems and services are flexible and responsive.

United with Love, Huntington, IN: A 40-year-old Christian social services organization, United with Love is not affiliated with any specific church. They are funded by the local community, churches, donations, and state support. The organization operates the largest food pantry in the county, providing families with access to food up to six times per month. They also offer personal assistance with expenses such as gas, pet food, electricity, rent, and medical bills. The organization has handled cases involving the safeguarding of unaccompanied working youth. Their referral systems and services are flexible.

Amani Family Services, Fort Wayne, IN: Amani serves as a one-stop shop for migrants in Allen County, supporting individuals from 35 countries and providing services in 17 languages. Their offerings include safety planning for migrants who have experienced crime, individual therapy and support groups for substance addiction, and case management for Department of Child Services (DCS)-referred cases involving child abuse, including child marriage and trafficking. They also handle foster care cases. Their referral systems are flexible, and their services are comprehensive; however, future federal funding, particularly for health services, remains uncertain.

Identified weaknesses among the identified civil society organizations:

- Little to no experience in child labor remediation: None of the organizations have practical experience in child labor remediation, although they have broad experience working on various components of a typical remediation process. However, all of them are keen on learning more, and some have previous experience with related issues, such as sex trafficking.
- Little to no experience working directly with businesses as a partner: Several receive funding from local business entities for various community initiatives, but few, except Immigration Connection, work directly with brands and suppliers, e.g., providing direct services at workplaces.
- Risk of funding shortage: Several organizations shared that they fear the federal funding they usually receive via the state system will be reduced for the next fiscal year, particularly health services. Some are in the process of changing their names or are considering this given the current political climate.

4.2.2. ORGANIZATION OF CHILD PROTECTION SERVICES

Since most of the identified organizations are non-governmental, it is also important to understand how Child Protection Services (CPS) in Indiana is structured, and why it may not necessarily be considered the first “go-to” entity in child labor remediation. We also outline the key strengths and limitations of this system.

CPS in Indiana is administered through the State Department of Child Services (DCS), operating via county-level offices across 16 regions. These offices are led by regional directors and are part of a centralized, state-level department – not local, city, or county government. This centralized model has implications for how services are delivered and coordinated at the local level.

The DCS services act as the central coordinating body for most of the civil society organizations (CSOs) that are contracted to deliver federally or state-funded child protection services in Indiana. Admissions to essential services like shelters and mental health services are typically only possible through DCS referrals. CSOs working

under DCS contracts are strictly bound by the scope of services defined in their contracts with the DCS and therefore have limited flexibility in responding to cases outside those parameters.

Due to this centralized coordination model, some CSOs were convinced that the DCS would be the only authority to coordinate any child labor-related issues. However, past child labour cases demonstrate that this is not necessarily the case. The Centre has contacted DCS offices in multiple cities across Indiana, but was consistently turned away.

Identified strengths within the CPS

Several support mechanisms exist within child protection services that can be utilized or partially utilized during child labor remediation.

- C The implementation of the McKinney-Vento Act:** This federal law protects the educational rights of homeless children and youth. In Indiana, the Act is implemented through school-based liaison officers, and it appears to be functioning more effectively here than in other states where The Centre has conducted outreach. Access to services depends on the availability of shelters, the capacity of liaison officers, and adequate funding (see Box 1 for more information).
- C Youth Service Bureau corporations:** YSBs provide services for out-of-school youth, those in the juvenile justice system, and youth needing skill-building or guidance. These organizations serve as implementation arms of DCS services and are typically managed by different CSOs, often covering multiple counties. They are centrally coordinated by the Indiana Youth Services Association, which functions as a support extension of DCS.
- C Safe Place programs:** Safe Place offers 24/7 emergency support for young people in crisis, including access to temporary shelter through host families or kinship care. In the areas assessed in Indiana, the program is operated by the YMCA in Fort Wayne (currently fundraising to build a shelter) and the Youth Services Bureau in Huntington. However, availability depends on the presence of a service provider near the child's location, and in some areas, no local partner may exist.

Identified weaknesses within the DCS system

- C High workload at DCS offices:** Local CSO personnel note that high caseloads can lead to some cases, such as 16-17-year-olds needing shelter, being deprioritized. Some Indiana CSOs prefer not to refer cases to DCS unless they clearly involve child maltreatment (abuse or neglect), believing older teens (above 16 years) are often overlooked due to cultural norms and workload. As a result, they primarily report cases of abuse, especially sexual abuse, while avoiding foster care placement when it may not serve the child's best interest.
- C Strict service contracts and little flexibility:** Although state functions are outsourced to civil society organizations, strict service contracts create barriers between them. The Centre contacted two Indiana shelters—The Villages and Josiah Whites—both of which required referrals from the Juvenile Justice System or DCS. Their criteria include foster care placement or probation for substance recovery, sexually harmful behavior recovery, or behavioral treatment. Consequently, many youth involved in child labor fall outside eligibility.
- C DCS offices focus on coordination rather than direct public service.** They are not centrally located and lack in-house translators, making access difficult, especially for vulnerable populations. Self-referrals in child labor cases are rare, and those working with children—teachers, social workers, and

counselors—often lack awareness of the risks and prevalence, leading to underreporting. Even when child labor cases are identified, there is no response mechanism in place, and the children would fall outside of the eligibility criteria.

- C DCS referral dependency for shelters to serve minors:** Shelters⁸ mostly serve minors within the system of child protective services, whose cases are processed and referred by DCS (according to the mandatory reporting rule in Indiana⁹). Therefore, shelter admissions are strictly coordinated by DCS, leaving self-referrals unserved. Minors living outside their parents' house, or living with their parents in improper housing conditions, are left out.
- C Lack of preparedness for new migrant communities:** Northeast Indiana has received migrant communities from Haiti, Afghanistan, Ukraine, Burma, and Central America over the last 10 years, and while service offerings have somehow been redesigned to meet specific needs, migrant communities are still facing gaps. For example, some shelters are faith-based and serve, mostly, Christian populations with little to no services for other faith groups.

⁸ E.g.: Josiah Whites (a church-based shelter for minors) in Wabash, IN and New Life Ministries in Huntington, IN both serve youth in the probation period or the foster care system.

⁹ For mandatory reporting rule in Indiana, see [here](#): “Indiana is a mandatory reporting state; anyone who suspects a child has been neglected or abused must by state law make a report.”

Box 1: The McKinney-Vento Act

McKinney-Vento Act

McKinney-Vento is a federal act that aims to ensure the educational rights of homeless youth. It operates through liaison officers in schools. The provision of services depends on funding and the capacity of the liaisons.

Service offerings: Enrolling the child immediately to school after arranging transportation services through state services (in 1-2 school days). Providing educational support such as make-up homework and exam opportunities, academic support, partial credits, etc. Using the funding for books, stationery items, physical check, eyeglasses, uniforms, school trip, etc. for the children. Referring children and families to available services (e.g. housing, legal, medical) and supporting them in filling out applications.

Eligibility: Children who lack (1) fixed, (2) regular, or (3) adequate nighttime residence. Including undocumented children.

Referral mechanism: Self-referral by parents, identification through school personnel or school liaisons, or any other organization.

Challenge: Public schools provide services regardless of funding but must apply for grants, with funding based on the number of homeless children served in the previous term. Many children and families remain unaware of these services. Efficiency depends on local service availability and liaison expertise, necessitating long-term case management.

This act's **definition** of homelessness is more inclusive than the Housing and Urban Development Act (HUD).

4.3. MINNESOTA STAKEHOLDER ENGAGEMENT RESULT

Our visit to Minnesota focused on Worthington, a small rural town in the southwestern part of the State with around 13,000 inhabitants. The city has historically attracted migrant workers due to the prevalence of jobs in food manufacturing, meat processing, and farms specializing in corn, wheat, eggs, and dairy products. Workers travel across the county and state lines (including into Iowa). Migrants often live in one city and work in another, relying on informal carpooling systems. The city has 30 nationalities and at least 15 spoken languages, including those of Guatemalan (indigenous and Spanish-speaking), El Salvadoran, Mexican, Somali, and Haitian communities.

Our meetings with local stakeholders confirmed that while more than 20 child labor cases were exposed in 2023, non-exposed child labor still exists in the community. Fake IDs and Social Security Numbers are used by children under 18 to access work opportunities. We were told that children as young as “middle school” (11-13 years) are recruited by informal labor agents to do farm work, including using sharp tools such as machetes to do weeding. While this is not illegal according to the state law, this is not acceptable from a child protection perspective. Also, if there is widespread use of children in farming and illegal workplaces, there is a high risk that the use of children will spill over to the formal sector.

We were also told that labor trafficking is common and that local law enforcement agencies only consider labor trafficking a crime if a person is trafficked across state borders.

4.3.1. IDENTIFIED ORGANIZATIONS

The Centre met with several organizations in Worthington, including the Child Protection Services/Nobles County Community Services. Compared to Indiana, the service delivery of CSOs and government services that The Centre met with is more accessible, with multiple referral routes and self-referral options. There is an established collaboration between the CSOs and the CPS unit in Worthington. The cases of affected children are shared with and referred to United Community Action Partners UCAP for shelter needs, Southwest Crisis Center for forensic interviews, and Southwestern Minnesota Opportunity Council Inc. (SMOC) for transportation, fuel, and utility cost support. The organizations mentioned that the news releases about child labor cases in Worthington in the previous years have served as a wake-up call regarding the prevalence and scale of undocumented and unaccompanied minors in their community.

Our preferred partner organization is Minnesota Seeds of Justice, which then coordinates with other local service providers, including legal, educational, and child protective services, in the event of a child labor remediation effort.

Table 5: Selected partner organizations in Minnesota

SELECTED PARTNER ORGANIZATION	ORGANIZATION TYPE	SERVICE TYPE	LOCATION (CITY/TOWN)
Minnesota Seeds of Justice	Charitable Organization	Migrant services, health services, and youth development	Worthington

Minnesota Seeds of Justice: The organization was established three years ago, but their work dates back 15 to 20 years. Their leading team, which speaks several languages, is well known among the migrant communities and have had multiple posts in the university, public schools, boards of other support organizations, etc. Their services are needs-based and may be short or long-term depending on the funding. They work on addressing health disparities, health care access, youth leadership and youth development. They organized job fairs, provided COVID-19 vaccines to migrant workers, facilitated “your rights” sessions, provided emergency shelter, and continue to offer culturally relevant food in the food pantry. They possess local knowledge and a vast network, and they are mindful of the risks of child labor in the community. Their services are adaptable; however, funding is limited. They are in the process of changing their name to “Minnesota Seeds”.

Identified weaknesses among the identified civil society organizations

- ❑ Little to no experience in child labor remediation: None of the organizations have practical experience in child labor remediation, although they have broad experience working on various components of a typical remediation process. However, one of the organizations we met with is an expert in “forensic interviewing” of children, and does that on behalf of the police or when a crime is suspected. This is a great asset to have in the local community, as child laborers often are scared and traumatized when exposed.

- Little to no experience working directly with businesses as a partner: The local law firms work with some local business partners, providing legal advice regarding immigration law.
- Risk of funding shortage: As with the organizations in Indiana, a funding shortage is expected, and there is much uncertainty about how this will play out.

4.3.2. ORGANIZATION OF CHILD PROTECTION SERVICES

Unlike the organizational structure of child services in Indiana, Child Protective Services (CPS) in Minnesota is administered not by the state-level department unit but by the county-level local government units of human services in 84 counties. This means that child services in each county are an integrated part of other county-level community services, working within the same public-facing office in collaboration. According to our observations, the decentralized structure has a positive impact on the approach and implementation of services. The Family & Children's Social Service under the Nobles County Community Services is thus an integral part of the solutions in a potential child labor remediation effort.

Different organizations use different labels to prioritize child labor cases, and the flexible programming could potentially help prioritize child labor cases in Worthington. In our discussions, one of the CSOs mentioned that they could classify child labor under "domestic violence" programming, to provide immediate support by attributing a priority status. The Family and Child Services mentioned that they could use the Child Welfare case type for child labor cases to provide comprehensive support to the family, including financial assistance.

It should be noted that the child protective services (CPS) was not called in or notified when the child labor cases in these communities were exposed, because it was seen as a DOL issue. There is hence a need for greater collaboration between child protection services and DOL officers to ensure that the rights of the child are protected at every step of child labor violation investigations.

5. CONCLUSIONS AND NEXT STEPS

Child labor remains a reality in the U.S., yet child protection agencies and local organizations often struggle to address it. Their challenge lies in protecting the child without worsening their situation, particularly for migrant children, whose exposure may reveal broader immigration challenges such as detention and deportation. Many child protection officers are also unaware of potential company-led remediation programs.

The Centre's recent work has shown that there are viable pathways for most affected children, including access to legal aid and shelters. Furthermore, there is a strong local commitment to supporting vulnerable children, with organizations eager to learn more about child labor remediation with the best interest of the child in focus. Hence, the fear of "doing the wrong thing" should not deter action from local CSOs and child protection services.

For remediation to be effective, businesses that face child labor in their supply chains must engage in open discussions about financial compensation and support, and take responsibility for labor violations in their business operations, including those of their contractors. While this is a contentious issue, we recommend that companies adopt a child rights approach, prioritizing children's well-being over commercial interests.

Based on the findings described in this report, we suggest the following next steps:

- C** **Appointing a coordinating entity** to serve as the main focal point for AIM-Progress members and selected organizations. The organizations, in their current form, lack the capacity to respond quickly and accurately to various companies regarding child labor suspicions and cases. Many of them also have no experience working directly with the business sector, and what this entails in terms of confidentiality.
- C** **Providing training on child labor remediation to the selected partners:** Most, if not all, do not have any experience or knowledge about child labor remediation processes as described in Human Rights Due Diligence frameworks.
- C** **Compiling a roster of specialized support organizations** offering legal aid, education, and other services.
- C** **Formalizing a child labor remediation network** with clear Terms of Reference and confidentiality agreements for involved partners.