

Child and forced labour policy

Protecting children and workers, with a practical response to suspected abuse.

Draft for ASMRAF review - Version 0.2 - 14 October 2026

Prepared for the South African launch. These are proposed rules, not confirmation that legal arrangements, staff or services are in place.

1. Who this protects

This proposed policy applies to mines seeking ASMRAF verification, their contractors, labour brokers, assessors and ASMRAF personnel. It prohibits child labour and all forced, trafficked or bonded labour. As a proposed ASMRAF participation rule, nobody who is a child may undertake hazardous mining or processing work. Any stricter applicable rule also applies. This rule is not a statement that every country has identical labour law.

2. Checks before verification

Assess recruitment methods, age-verification practices, working hours, wages, freedom of movement and ability to leave employment. Interview workers privately and safely, with suitable language support. Check for withheld identity papers, recruitment debts, threats, coercion, wage withholding, exploitative deductions and restrictions on leaving. Do not treat a signed declaration as sufficient evidence or collect children's identity documents casually.

3. Responding to a concern

Prioritise immediate safety. Do not confront a suspected trafficker or expose a complainant to retaliation. Escalate to a trained safeguarding lead, make a factual confidential record and obtain competent advice on mandatory reporting and safe referral. Where someone is in immediate danger, contact appropriate local emergency services. Do not promise confidentiality that prevents a legally required protective disclosure.

4. Protective remediation

Do not respond by simply dismissing a child or withholding wages. Work with appropriate protection services on safe removal from hazardous work, education and family support, considering the child's interests. For forced labour, prioritise safe exit, return of documents, access to earned wages and suitable support. Involve affected people safely in remedy planning. Keep the names and locations of vulnerable people out of public reports.

5. Verification consequences

Credible serious-abuse concerns must be escalated and can prevent or suspend verification. A routine corrective-action plan cannot justify continued abuse. Any restoration requires independent evidence that the harm has stopped, remedial steps are effective and recurrence risks are addressed. Buyers and providers receive only the status and relevant restriction information they lawfully need.

6. Reporting and oversight

Use info@asmraf.org to request a safe reporting route, without sending sensitive case files to a general inbox. A person may ask that their identity be withheld, although ordinary email is not anonymous. Do not penalise good-faith reports. Keep a restricted case log, referral record and follow-up review. The safeguarding lead must arrange staff training and review this policy annually and after any serious case.

Before adoption

Appoint a safeguarding lead, establish South African referral and emergency arrangements, confirm reporting duties and secure case access, and train assessors.

Proposed accountable role: ASMRAF safeguarding lead. Record named appointments and an adoption date before operation.

References

[ILO child labour standards](#)

[ILO mining resources](#)

References inform this draft; they do not imply endorsement or certification of ASMRAF.