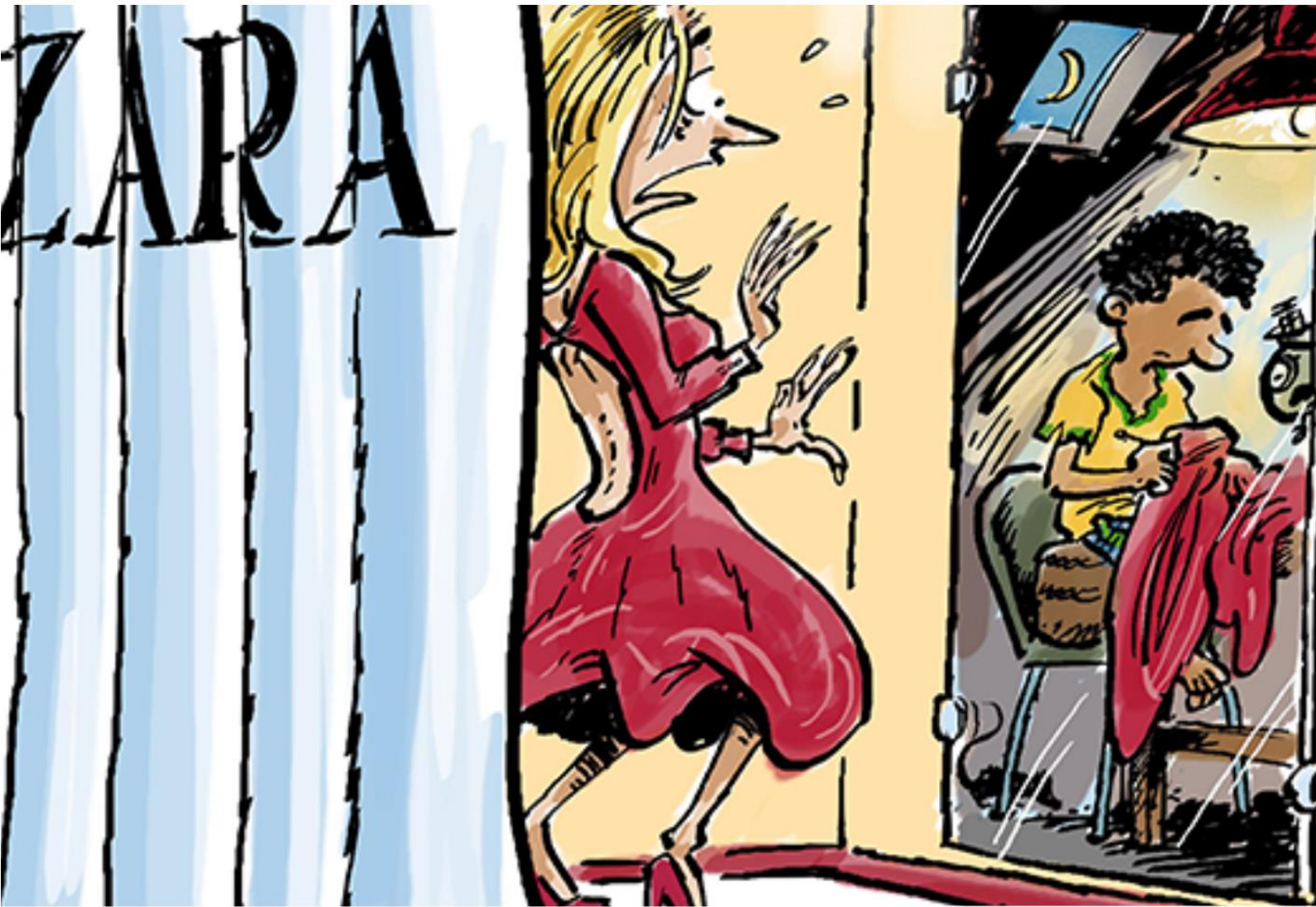


PUTTING CONTEXT INTO PERSPECTIVE: RECOGNISING THE
DIFFICULTIES OF TRACING CHILD LABOUR IN THE INDIAN
AND TURKISH GARMENT INDUSTRY



Master Thesis International Development
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Abstract

This thesis research aimed to explore the country-specific factors of India and Turkey that impact the efforts of Dutch fashion brands in tracing child labour in their supply chain. India and Turkey are popular outsourcing destinations for many fashion brands across the globe. Nevertheless, this shift of labour-intensive parts of the garment supply chain occurred at the expense of the garment workers. Forced labour and child labour are just two examples of the social costs of the unsustainable nature of the fast fashion business model. Although child labour is prohibited in many countries, it continues to persist. Since the matter has gotten more attention, the majority of child labour continues in hidden contexts. Suppliers are faced with excessive demands by their buyers, often exceeding the factory's production capacity. As a result, suppliers will subcontract parts of the production processes to smaller, informal units. The unregistered and unorganised nature of these subcontracted units are more prone to child labour, as both the government and the focal company are unaware of the existence of these manufacturing units. The complex nature of the garment industry has challenged companies' corporate social responsibility and transparency efforts. This research has applied agency theory to understand how contextual factors challenge traceability efforts by examining the question of responsibility and cultural differences among all actors involved. The findings have been based on content analysis and semi-structured interviews with NGOs, supply chain actors of America Today and participants involved in Dutch legislation. The findings confirmed that country-specific factors affect the efforts of Dutch fashion brands to detect child labour in India and Turkey. The extent to which these factors influence traceability is largely shaped by the cultural differences and narratives of the involved actors. An imbalance of responsibility and asymmetrical information create a foundation of distrust among actors. Therefore, the findings demonstrated the importance of building an equal relationship founded on trust.

Keywords: *Fast fashion, child labour, corporate social responsibility, transparency, traceability, agency theory, responsibility, social compliance, distrust.*

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Attached you will find my communication product. The aim of this product was to provide cohesive, but brief information on the contextual factors which might portray as an issue to Dutch fashion brands. For this reason, my main target audience are Dutch fashion brands, but it can also be targeted to people would like to use it in their own qualitative research. Thus, the main message is the following: if a brand wants to effectively trace child labor throughout their supply chain, they should start by building a strong relationship with their suppliers. This means, having an open attitude and get to know more about the cultural context of the producing country. By having a frank conversation with the suppliers, the companies can have avoided a buyer-supplier relationship that will be characterized by distrust and asymmetrical information. Furthermore, it can avoid unclarity about responsibility and an imbalance of power among all involved stakeholders. All in all, this communication product focuses on spreading awareness of the necessity to understand each other's decision-making among Dutch fashion brands, with the particular focus on child labor risks.

I choose this format, as I thought it would suit the most with my research topic. A short report gives the space to write and touch upon several segments of the thesis, and for this reason, was the best choice.

I did not get any help in making this and based it all on my final thesis.

Best wishes,

List of abbreviations

AGT – Dutch Agreement on Sustainable Garments and Textiles

CSR – Corporate Social Responsibility

EC – European Commission

FLA – Fair Labour Association

GMACL – Global March Against Child Labour

ILAB – Bureau of International Labour Affairs

ILO – International Labour Organisation

INGO – International Non-Governmental Organisation

KIT – Royal Tropical Institute

NGO – Non-Governmental Organisation

OECD – Organisation for Economic Co-operation and Development

SCV – Supply Chain Visibility

SCT – Supply Chain Transparency

SDG – Sustainable Development Goals

SER – Dutch Social Economic Council

SSCM – Sustainable Supply Chain Management

SOMO - The Centre for Research on Multinational Corporations

TfS – Traceability for Sustainability

TPS – Temporary Protection Status

UNDP – United Nations Development Principles

UNICEF - United Nations Children's Emergency Fund

1.1. Introduction

Due to the availability of new communication tools, individuals are more informed about emerging trends. In many industries, these rapid-fire developments have accelerated turnover rates. One of the industries which is characterised by the constant changing trends, is the fast fashion industry. "A business model based on offering consumers frequent novelty in the form of low-priced, trend-led products", is a definition often used when addressing the fast fashion sector in academic discussion (Niinimäki et al., 2020). Nowadays, consumers are used to buying and owning almost five times more clothes than people used to have decades ago (Charpail, 2017). This increased consumerism of cheap clothing is possible due to low manufacturing costs. Considering the pace at which the products are being made and designed, 'throwaway fashion' diminishes the need for clothing repair because of their fragile and cheap design (Peters et al., 2021). According to Camargo et al. (2020), the fashion industry is grounded on delivering emerging fashion trends with a short lead time of around five to six weeks. Lead time can be conceptualised as the time needed between a consumer's order and the delivery of the product. Therefore, the business model used by brands such as H&M, Zara and C&A rely on satisfying customers' demands. One can view the driver of increasing clothing purchases both as a result of consumers who are unwilling to change their decision-making and producers who continue their

unsustainable production practices. The mass manufacture of these clothes conceals a rather alarming background.

Despite the industry's alarming implications, a new generation of fashion brands has entered the fast fashion market and adopted a quicker supply chain system, ultra-fast fashion. Brands that can be defined as ultra-fast are ASOS, Boohoo, Shein and Misguided (Camargo et al., 2020). Camargo et al. (2020) describe ultra-fast fashion as an industry that highlights production efficiency even more extensively and faster than the fast fashion industry. More specifically, it immediately reacts to customers' interests by reducing the time span between the design and sale of garment products (Camargo et al., 2020). The difference between fast and ultra-fast fashion brands is quite refined; however, it is relevant to illustrate why these brands are experiencing high sales and success rates. Ultra-fast fashion brands are significantly involved in e-commerce, considering digital innovation has shaped consumer decision-making patterns (Camargo et al., 2019). Whereby fast fashion brands have a lead time of 2 to 4 weeks, ultra-fast brands have a lead time which might solely take a couple of days to a week (Camargo et al., 2020).

By moving the labour-intensive part of the value chain to low-wage countries in south-east Asia, a clear division between consumer and producer countries has emerged (Peters et al., 2021). The shift is possible at the expense of the garment workers, considering the competitiveness in the fashion industry was characterised by a so-called 'race to the bottom' in labour standards (Franceschini, 2019). Furthermore, in order to meet the demands of consumers in the western parts of the globe, child labour and forced labour continue to exist. Even though, in many countries, child labour is strictly forbidden, garment-producing countries are still employing young children (Moulds, n.d.). Child labour is a significant problem in the fashion industry since most of the supply chain necessitates low-skilled labour, and some practices are better equipped for children than adults. Manufacturers like to recruit children to pick cotton since their little fingers do not harm the cotton (Moulds, n.d.). The shifting dynamics within the supply chain are therefore questioned in terms of their unsustainable nature, the impact on garment workers, and the impact on the environment.

1.2. Problem statement and relevance

The unsustainable nature of the industry has made room for questioning the human cost of the garment industry and the pressure it has put on nature's resources (Niinimäki et al., 2020). Even though the impacts of the industry seem to become more publicised, the fast fashion sector continues to grow larger every year (Niinimäki et al., 2020). Child labour is a by-product of the production of inexpensive clothing, which many firms would prefer not to be associated with. The complex nature of the industry's supply chain forms one of the main challenges to tracing risks of child labour throughout a brand's production process. Although efforts to recognise child labour have been made, companies continue to

struggle to monitor child labour, especially upstream in the supply chain¹ (Engelbertink and Kolk, 2021). Most child labour happens in unobservable stages of the industrial process, farther down the supply chain. Non-Governmental Organisations (NGOs) have supported companies who are willing to improve their supply chains in combatting child labour through implementing corporate social responsibility (CSR) practices. Many of the CSR measurements, such as auditing, and building relationships with suppliers, still lack effectiveness (Engelbertink and Kolk, 2021). It is therefore critical to identify the underlying impacts on these existing hazards of child labour and the CSR methods intended to monitor and analyse those.

The academic literature is abundant on the drivers of child labour, leaving a research gap for an in-depth analysis of issues regarding supply chain traceability among garment-producing companies. Moreover, research mainly focuses on the surface level of child labour without providing effective solutions to improve traceability to support businesses (Zhang and Wu, 2021). Current academic debate lacks research on the impact of socioeconomic structures on the traceability of child labour, specifically from the perspective of companies and how companies can address it.

Additionally, most of the research on child labour traceability in the garment industry is focused on the downstream levels of the production process (UNICEF, 2020). Little is known about the severity of child labour in the upstream levels of the industry, and in particular, finding solutions to trace child labour in the upstream levels pose a challenge. According to Engelbertink and Kolk (2021), this research gap can be explained by the fact that neither businesses nor academics have a thorough knowledge of the involved parties or the circumstances in which the worst violations occur and can be averted.

Academic discussion regarding supply chain traceability in the context of sustainability is primarily focused on addressing either economic or operational dimensions of sustainability. As a result, the relation to social and environmental dimensions is mainly limited to production processes where consumer health is at risk (e.g. safe food) (Garcia-Torres et al., 2019; Köksal and Strähle, 2021). Garcia-Torres et al. (2019) touch upon the lack of attention for Traceability for Sustainability (TfS) in the context of the social and environmental costs of the garment industry (e.g. child labour). Regardless of the risen interest in studying management operations in multi-level supply chains, Köksal and Strähle stress the significance of understanding the context in which control strategies, like compliance standards, may be efficient. This begs the question of the settings under which social criteria are subjected, given that multi-tier supply networks are dominated by significant aim conflicts and knowledge asymmetries (Köksal and Strähle, 2021). As a result, this thesis will fill the current research gaps by concentrating on the impact of contextual factors on sustainable traceability efforts in light of the garment industry's social dimension (child labour).

¹ Upstream levels within a supply chain refer to the first parts of the supply chain (e.g. extraction of cotton, spinning mills). Downstream levels refer to the finishing parts of the supply chain and can also include levels beyond the production process (e.g. retail).

This research is relevant in various manners to the field of international development. First and foremost, it is worth mentioning that the fight against child labour is incorporated into two of the Sustainable Development Goals (SDG). The SDGs portray the agenda in the international development field where the three pillars of sustainable development are incorporated – social, economic and environmental development (UN, n.d.). SDG 8.7 refers to "immediate and effective measures to eradicate forced labour, end modern slavery and human trafficking and secure the prohibition and elimination of the worst forms of child labour, including recruitment and use of child soldiers, and by 2025 end child labour in all its forms" (ILO, 2017). SDG 16.2 refers to "End abuse, exploitation, trafficking and all forms of violence and torture against children" (ILO, 2017).

Secondly, the engagement of children affects the sustainability of their future development. Instead of attending quality education, children are working at a young age, barring them from future prospects. These children are the next generation, but they are also the most vulnerable group to global issues such as the environmental crisis and humanity crises. Specifically, children from poor and marginalised groups are facing the most difficult challenges due to the world's present trajectory (UNEP, 2022). Considering children are at the core of all dimensions of sustainable development, providing access to quality education is key to give them the childhood they have the right to and provide education at an early stage in their childhood as it proved to be most important state for significant human development (GSDR, 2015).

1.3. Research aim and questions

The aim of this research is to explore the contextual factors which challenge the traceability of child labour by Dutch fashion brands. The focus will therefore lie on the recurring patterns and trends visible throughout the data collection. The thesis will adopt a company perspective in order to analyse how the discovered elements impact companies' efforts to improve their supply chain. In order to put the thesis topic into context, the thesis conducts a comparative analysis of Turkey and India, focused specially on the cotton production of garments in these countries. The thesis will cut across both case studies by thematically framing them. The themes which will be used are supply chain visibility and inequality. Therefore, the thesis aims to answer the following research question:

What roles do country-specific factors play in relation to Dutch companies' efforts to trace child labour in the Indian and Turkish garment supply chain through themes of inequality and visibility?

Country-specific factors relate to elements that are exclusive to the producing nation; hence, the thesis analysis solely focuses on factors which relate specifically to either Turkey or India.

The following sub questions will support answering the main research question:

1. Which tier in the Indian and Turkish garment supply chain is most prevalent to child labour and why?

2. Which country-specific factors in Turkey and India are challenging the supply chain visibility of a fashion brand and why?
3. To what extent is inequality in Turkey and India enforcing the existing risks of child labour?

1.4. Structure of thesis

The thesis is structured as follows. Chapter 2 concerns the theoretical framework, which discusses concepts relating to child labour, supply chain visibility and CSR. Chapter 3 provides an overview and rationale for the research methodologies utilised throughout the thesis writing process. Chapter 4 contextualises the thesis' research objective in a geographical analysis of both case studies. The two analytical chapters present the main findings of the research. In chapter 5, the focus is to gain a better understanding of the garment supply chain and the perceptions of the role of Dutch brands while also conducting a risk analysis of child labour in the fashion industry. Chapter 6 thematically frames child labour as a supply chain interruption and assesses the impact of factors related to inequality and supply chain visibility. Chapters 7 and 8 provide a discussion and conclusion derived from the findings in relation to the theoretical framework. The last chapter presents the recommendations for companies who want to improve the traceability of child labour.

2. Theoretical framework

2.1. Corporate social responsibility

While economic globalisation, environmental sustainability and social responsibility are starting to become relevant matters more than ever before, the fast fashion industry started to be faced with the significance of sustainable development in society, environment and economy (Li et al., 2014). In order to combat the unsustainable nature of the current supply chain, Li et al. (2014) emphasise the necessity of sustainable measurements that need to be implemented by companies in the fashion industry. Nevertheless, many companies do not take responsibility for the environmental and human costs that come with a labour-intensive industry. This issue becomes visible in the apparent division between the aim of maximising revenues and having social responsibility as an organisation or company (Li et al., 2014). This is where CSR shows its importance. The most frequently used definition in scholarly research is constructed by the EC (2001, p. 6). It is depicted as follows: "a concept whereby companies integrate social and environmental concerns in their business operations and in their interaction with their stakeholders on a voluntary basis." (EC, 2001, p. 6). The social aspect within the definition can be

prescribed to how society is impacted and how measurements can support the entities that are affected. The environmental aspect ascribes significance to the minimisation of negative consequences resulting from the company's production processes. A crucial aspect of CSR is that it goes further than laws and resonates with the international norms of behaviour (Chan et al., 2020).

As CSR has become a significant concept to use in much academic research, Bhattacharya and Sen (2004, p. 9) claim "not only is doing good the right thing to do, but it also leads to doing better". Subsequently, Lindgreen and Swaen (2010) explain how the idea of CSR in contemporary studies has shifted from a theory to practice. Nowadays, with the increasing use of new communication technology, people value and view it as essential for companies and organisations to define their social responsibilities by employing social and ethical norms in their operations (Lindgreen and Swaen, 2010). CSR is often interlinked with theories such as the institutional approach, agency-based approach and stakeholder theory. According to Latapi et al. (2019), the international agreements that were constituted during the 80s and the 90s emphasised the influence of corporate behaviour. This moment posed an important milestone during the development of CSR, as the change of mindset started to spread globally (Latapi et al., 2019).

Additionally, Latapi et al. (2019) emphasise the link between the development of CSR and some of the important milestones of the sustainable development agenda. The analysis done by Latapi et al. shows how the literature on CSR appears deficient in addressing the process of implementing CSR in a company's core operations. Furthermore, the analysis argues that CSR can only be used partly and how this might stimulate concerns about its potential advantages (Latapi et al., 2019). Carroll (2015) criticises the nature of a company's motivation to implement CSR measurements, arguing it has never been pure altruism, even though most idealists would prefer it to be. However, in reality, businesses participate in CSR since they see the advantages for both themselves and society in the structure. It embodies the most broadly accepted type of conscious capitalism to date, and it is anticipated that CSR will expand in lockstep with the global economy (Carroll, 2015).

By building further upon the motivation of businesses to implement CSR, it is significant to analyse where this motivation originates from. Adopting CSR strategies is often used by companies to differentiate themselves from others in order to become more trustworthy to their consumers. Besides the positive effects on the environment and its workers, CSR can also lead to a positive brand reputation (Chan et al., 2020; Li et al., 2014). However, Karaosman et al. (2015) argue that many consumers are unaware of the CSR strategies, and thus it emphasises the absence of empirical evidence from a consumer perspective. Nevertheless, many retailers still lack CSR practices in their supply chain. They are not as transparent towards their consumers, despite their efforts of reporting some of their CSR efforts on their websites (Chan et al., 2020). Li et al. (2014) highlight the ability to establish a long-term

strategic competitive advantage if the company implements CSR measurements effectively. Therefore, Karaosman et al. (2015) explain CSR to be strongly related to marketing.

Yet, while CSR measurements are often used to win a good reputation with their consumers, some retailers do not effectively implement CSR to actually improve the supply chain but instead masquerade it as an idea of having genuine interests. Görg et al. (2018) question the genuineness of the companies that use CSR practices to differentiate themselves from other brands. An example of this corporate hypocrisy is "greenwashing". Greenwashing can be visible when retailers give consumers false information regarding environmental issues of their products or manufacturing process (Görg et al., 2018). Multinational companies' CSR labels are insufficient proof that they worry about their developing-country suppliers. Extra information on the companies' CSR activities may be necessary before a consumer can make an informed purchase choice (Görg et al., 2018).

2.2. Supply chain visibility

With customers' growing knowledge of the labour standards and environmental harm their purchasing habits cause, the need for supply chain transparency (SCT) and visibility among businesses is rising vastly. More firms than before are providing customers with information concerning their goods and manufacturing networks due to the complexity of today's supply chains (Sodhi and Tang, 2019). The conceptualisation of both terms continues to be assessed in academic literature. It is important to distinguish between supply chain transparency and supply chain visibility (SCV), as sometimes, people confuse both. Supply chain transparency is focused on the disclosure of information to the public. This often involves mapping all stakeholders involved and sharing the upstream operations of the production process (Sodhi and Tang, 2019). In order to be able to disclose information to the consumers, a step prior to transparency is supply chain visibility. Supply chain visibility concerns the process of gathering information, both upstream and downstream of the companies' supply chain (Sodhi and Tang, 2019). Another distinction between both concepts relates to the stakeholders involved.

On the one hand, visibility serves the demands of internal stakeholders, such as management, direct suppliers, and consumers. On the other hand, transparency addresses a larger collection of external stakeholders, particularly customers and customer rights lobbying groups and non-governmental organisations (Sodhi and Tang, 2019). This research will draw on Barratt and Oke's (2007, p. 1218) notion of SCV "the extent to which actors within a supply chain have access to or share information which they consider as key or useful to their operations and which they consider will be of mutual benefit". Since this research focuses on firms' efforts to achieve SCV for child labour traceability, the next part will only examine the scholarly debate concerning SCV.

The benefits of gaining SCV are significant for a company's development. End-to-end SCV (from first-tier supplier to end customer) allows supply chain stakeholders to reach a better market activity while

limiting the risks of interruptions to production flows (Somapa et al., 2018). Table 1 pins down the different risks a company experiences when there is no significant effort to improve SCV.

Table 1: Supply chain risks (Somapa et al., 2018)

Risks for buying firm	Suppliers' risky behaviour
Material risks	Use of materials that violate agreements/regulations or use ingredients not allowed in the buying firms' markets
Product risks	Use of unsafe materials in products or unsafe manufacturing practices
Reputation risks	A hazardous working place; use of child labour
Environmental risks	Violation of the environmental regulations not just in the buying firm but also in the suppliers' country
Product development risks	Accepting to deliver a product or component without the necessary capability or manufacturing process to develop it in time for market launch
Product delivery risks	Failing to deliver on time

Kalaiarasan (2022) explains the cruciality of having a significant SVC, as events such as the COVID-19 pandemic have shown the vulnerability of complex supply chains. Lack of visibility in both the upstream and downstream have led to the increase of interruptions throughout the supply chains. Especially, the lower tier suppliers are less visible to the buyer companies, as even in some cases, suppliers further down the chain are unknown to the buyer companies. Therefore, the need to focus on efficient SVC is crucial for manufacturing companies (Kalaiarasan, 2022; Sodhi and Tang, 2019).

Nevertheless, Somapa et al. (2018) and KPMG (2016) argue that most supply chains' efforts to reach visibility have not reached full efficiency. A lack of standard SCV measurements has been cited as a significant worry and difficulty for SC directors, which impedes the advancement of SCV throughout companies. According to Caridi et al. (2014), Information and Communication Technologies (ICTs) are crucial for increasing a company's SCV. However, considering the high expenses and resources required to adopt ICTs, it is key for top management to thoroughly comprehend the advantages for the company in order to be convinced that these investments will be beneficial in the long term (Caridi et al., 2014).

2.3. A Traceability Framework

Supply chain visibility often goes hand in hand with traceability. Traceability is a subset of visibility that refers to a firm's ability to determine the origin of a product. It is an issue of transparency in deciding

if a business makes any of its provenance or other production chain data available to the general public (Sodhi and Tang, 2019). Kumar et al. (2017) showcase the importance of embedding a significant traceability framework into one's supply chain, particularly in the garment industry. Ensuring quality in an industry with a complex web of involved actors is crucial in the modern textile industry. Traceability has become an essential component of CSR management. Along the same lines, Garcia-Torres et al. (2021) argue the predominant role of traceability in Sustainable Supply Chain Management (SSCM) literature, as it significantly impacts product quality and sustainability aspects. Yet, Garcia-Torres et al. prefer using the notion of "Traceability for sustainability" (TfS) instead, as it integrates both operational and sustainable aims into the traceability process. They argue the deficiency or incompleteness of traceability efforts as a cause of the many sustainable crises and thus emphasise the importance of assessing traceability from a sustainability perspective (Garcia-Torres et al., 2019). The UN has conceptualised traceability in the context of sustainability in the following manner: *"The ability to identify and trace the history, distribution, location and application of products, parts and materials, to ensure the reliability of sustainability claims, in the areas of human rights, labour (including health and safety), the environment and anti-corruption (United Nations Global Compact Office, 2014, p. 6)." Garcia-Torres et al. condemn this conceptualisation for neglecting the economic and operational dimensions. TfS does not solely concern information sharing and transparency but instead applies organisational systems and learning methods to manage and regenerate data throughout the entire supply chain in order to ensure that SDGs are met. Garcia-Torres et al. criticise prior research on TfS for lacking literature, even though its importance has been stated several times by academics in the field.*

2.3.1. Traceability for Sustainability and Agency Theory

In the context of sustainable traceability, Merminod and Paché (2011) and Shukla et al. (2018) argue that buyers mainly concentrate on their first-tier suppliers. The buyers shift the responsibility of traceability regarding the upstream processes onto the first-tier suppliers. Merminod and Paché demonstrate this relationship by applying a principal-agent/agency theory. In this situation, the buyer is the principal, and the first-tier supplier is the agent. Although the agent is required to adhere to the principal's CSR policies, it is the principal's responsibility to ensure that proper traceability practices are adopted among all stakeholders. Similarly, agency theory can be implemented in modern outsourcing strategies (Merminod and Paché, 2011). Other perceptual agents, such as NGOs or regulators, construct their agency—that is, their responsibility as well (Power, 2019). Power expresses relevance to including third parties when adopting agency theory. When agency is spread throughout the supply chain, there also may be a great deal of ambiguity regarding both competency and accountability. The accountability among third parties often does not correspond with the established "framework for accountability". The unclarity can be derived from governance issues in relation to traceability, as Power points towards the existing unclarity of responsibility. Furthermore, the imbalanced distribution between capability and responsibility of traceability can lead to anxiety among actors on a supply chain they cannot control (Power, 2019). Shukla et al. explain the existing anxiety as a result of chain liability. Chain liability can

be understood through the lens of the external stakeholders (e.g. consumers and the government), who mainly focus on the buyers' actions and hold them accountable for the manufacturing processes of the buyers' supply chain.

Multi-tier supply chains are characterised by the number of actors involved, which increases the significance of agency theory. The issues that arise when the principal assigns tasks to the agent are addressed by this approach. The norms constituted by buyers' might be at risk by agents motivated by self-interest (Shukla et al., 2018). Köksal and Strähle (2021) identified the complexity of applying agency theory to a multi-tier supply chain. As multi-tier supply chains often involve indirect actors, defining the principal and agent shows to be more complicated. The buyer is the principal to the first tier supplier, while the first tier supplier is the principal to tier 2. The implementation of social compliance might be faced with opportunistic behaviour of the upstream level actors, as they perceive themselves as agents. Therefore, the most effective contract controlling the principal-agent partnership is the main emphasis of agency theory (Köksal and Strähle, 2021). For this reason, Köksal and Strähle have outlined four agency problems where opportunistic action is predicted to arise: 1. Both principal and agent are driven by self-interest, which is visible in their conflicting goals, 2. Due to the contradicting goals, agents are tended to hide information demanded by the principal, leading to asymmetrical information, 3. Risk perceptions differ between principals and agents, and 4. Uncertain context might decrease the control of the involved actors (Köksal and Strähle, 2021). The four underlying assumptions on agency problems will be applied throughout the analysis of this research.

2.4. Defining child labour

The academic literature continues to analyse and debate the notion of child labour. Even though the International Labour Organisation (ILO) has constituted a widely acknowledged definition of the concept, the definition of child labour varies per country and culture. This thesis complies with the ILO's definition: *"child labour can be defined as the work that deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development."* (ILO, n.d.) The conceptualisation of child labour is challenging as it is intertwined between the concept of childhood, labour and work (Bhukuth, 2008; Bilal, 2010). Childhood can be defined based on the child's age; nonetheless, Bilal (2010) suggests that age as a factor is not adequately applicable in all cultures. Khan (2010) provides a different approach and stresses that no common definition of childhood can be used as the sole lens through which one observes child labour. Instead, Grootaert and Kanbur (1995) point toward social status as a determinant in defining childhood or a child. In poorer rural areas, child work is not particularly seen as bad but rather as a socialisation process to introduce a child to socio-economic society. The debate is specifically continuous around the conceptualisation of work. Work can range from helping out at home, working in the family business, or being engaged in paid labour (Grootaert and Kanbur, 1995). According to Bhukuth (2008), when there is an attempt to define 'light work,' there is a lack of unanimity. Paying children subjects them to exploitation, although the ILO distinguishes

between employment that might affect a child's physical and mental growth and those that do not. Bhukuth (2008) criticises this division for being equivocal. Along similar lines, Engelbertink and Kolk emphasise the current inconsistency of national definitions of heavy and light work. The irregularity among companies and NGOs can become a struggle in the case of project application. Due to the difference in heaviness between labour practices, Grootaert and Kanbur emphasise the necessity of defining the type of work and the nature of the child's engagement with its employer to form an effective policy on child labour. Whether the nature of the relationship is exploitative or not, the definition of child labour can vary.

Furthermore, there is a distinction between paid and unpaid child labour. Paid labour refers to the production intended for the market and involves children in economic occupations. Nevertheless, the production which is intended for the market, but is created by unpaid child labour, can also be categorised as children who are involved in economic occupation. In addition, it covers children who are involved in unpaid employment within and outside their home, given that the output they are engaged in is meant for the market (Bhukuth, 2008). In line with Bhukuth's definition of what conforms as 'work,' the labour activity must create revenue, even if the child does not directly profit from it. The same definition also excludes indirect child labour such as domestic work, e.g. helping out with household tasks. Contrastingly, a study by Naidu and Ramaiah (2006) concluded that child labour refers to "any child out of school" (p. 199). Meaning, the concept of child labour refers to any non-school-going child, regardless of whether the child is involved in paid or nonpaid employment. Burra (2001) favours this specific definition of child labour, as it stresses that every not-in-school child is exposed to child labour in some form. Furthermore, this definition prevents societies from minimising the problem of categorising child labour as paid workers or children engaged in hazardous labour practices.

Bilal (2010) focuses on the relationship between child labour and gender. Bilal stresses the difference between boys and girls in child labour. Specifically, the additional challenges young girls encounter and the higher risk of abuse in relation to the projected view of women and girls in societies. Particularly for girls, some circumstances cause friction between child labour and schooling, and these aspects are represented in the enormous gender discrepancies in schooling (Bilal, 2010; Filip et al., 2018). Girls are frequently more susceptible to exploitation owing to particular cultural standards, tasks, and expectations. Before taking preventative action, it is necessary to consider the societal expectations placed on girls and the inequalities in their positions and circumstances. In addition to the societal expectations set for young girls, Filip et al. argue that cultural beliefs are embedded in gender prejudice.

Moreover, cultural beliefs often contribute to child labour in many developing countries. It is customary for children to follow their parents' path in developing countries, leading to a different perception of education. Likewise, cultural beliefs add to the misconception that a young girl's schooling is less significant than a boy's education (Filip et al., 2018). Naidu and Ramaiah also point towards customs,

lack of school and traditional attitudes as a driver of child labour. Prakasha (2016) agrees with this statement and specifically highlights poverty and sociocultural structures to be drivers of child labour. Khan (2010) elaborates on the influence of culture and geographically specific conditions and criticises the western development paradigm for causing cultural and economic frictions between the developed and developing world. Khan also argues that the western lens substantially impacts the efficacy of child labour prevention initiatives. The tension Khan refers to has resulted from the different perspectives on defining childhood and presenting a certain picture of childhood as generally recognised. Hence, the western notion of childhood is visible in the agenda of western NGO interventions. Nieuwenhuys (2009) questions the western global standard of childhood in the light of Indian childhood, as the NGO agenda is designed on what NGOs perceive as the highest possible goal, hereby presuming the western set standard.

According to development theory, children are not perceived as economic agents. The economic perspective of children perceives household depends, not as decision-makers or productive actors. Instead, the economic perspective perceives children as prospective economic actors, a position they gain as soon as they become adults (Khan, 2010; Boyden and Levinson, 2000). The idea of children as potential economic resources can be related to Grootaert and Kanbur's socialisation process of children being introduced into economic development.

Conceptual model

The conceptual model (figure 1) integrates all concepts and theory as discussed in the theoretical framework. Agency theory demonstrates a relationship between the principal and agent. In the light of the thesis objective, principal can be understood as the buyer and the agent as supplier. The literature shows a discussion about who is responsibility for sustainable traceability within the complex chain of the garment industry. TfS can be reached through adequate SSCM, SCT and SCV. These three concepts are all related to CSR and CSR practices are implemented to tackle child labour. Having significant strategies of all concept mentioned above, are argued as important strategies to combat child labour risks and supply chain interruptions.

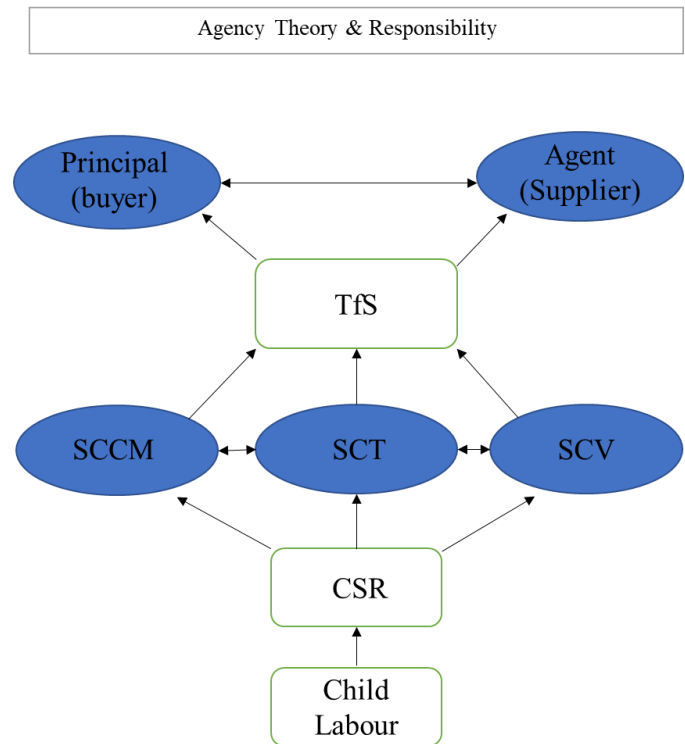


Figure 1 Conceptual model

3. Methodology

3.1. Research strategy

The aim of this research is to understand and map out the influences of contextual factors on the effectiveness of CSR practices conducted by Dutch fashion brands that aim to trace child labour. For

this reason, I intend to investigate the context in which child labour occurs by gaining an understanding of the supply chain and manufacturing process of the garment industry. This study gives a comprehensive understanding of the topic by uncovering the many explanations of the complexity of detecting child labour.

Qualitative research methods allow one to gain an in-depth understanding of specific issues and topics. In addition, qualitative research also aims to acknowledge and comprehend the context's impact on the research questions (Hennink et. al, 2020). Therefore, throughout this thesis I will be using a set of qualitative research methods. According to Hennink et. al (2020), sufficient use of the combination of a number of qualitative methods can also be defined as a “mixed method approach”. The methods which will be used, are the following: semi-structured interviews, content analysis, secondary sources analysis and a comparative analysis.

This section will be structured as follows. Firstly, I will elaborate upon the selection of the interviewees/organizations and why these specific participants are relevant to include in my research. Secondly, I will explain all of the qualitative research methods mentioned above and why these particular methods are used in this thesis. Lastly, I will discuss the methodological considerations in regards to positionality and limitations of the qualitative methods as well as the experience throughout the entire research process.

3.2. Selection of research participants and documents

Organizations/research participants

Throughout the research process, I have been in contact with the Dutch fashion brand America Today. America Today is not my main research focus or case study. Instead, the brand provided me with information and insights from a company point of view. The research outcome therefore does not specifically apply to America Today, but provides a company perspective to the analysis. The rationale for choosing America Today, mostly relied on their position on improving the fashion industry. Furthermore, the brand has been a member of the Dutch Agreement on Sustainable Garments and Textiles (AGT). This agreement focuses on mitigating the negative consequences of the textile industry by applying the due diligence standards according to Organisation for Economic Co-operation and Development (OECD) guidelines and United Nations Development Principles (UNDP) principles. I will elaborate on the effectiveness of the AGT in chapter 5.3. America Today's participation showed a willingness to make changes to their business model. Thanks to the provided contacts by America Today, I was also able to grasp a local context of the producing countries, making the findings not only more pertinent but also more comprehensive.

For the data collection, I made use of semi-structured interviews. The participants that took part in this research, have been selected on a small set of criteria. The interviewees were selected based on their

nationality, function and expertise. Interviews have been conducted with experts in the field of child labour, stakeholders/employees within America Today's supply chain from India and Turkey and participants involved in Dutch legislation which aim to combat child labour. A table with all organizations and interviewees is included in the appendix (appendix A). Throughout the analysis, I refer to each participant with "Interviewee" and a number, which is ranked on the chronological order of data gathering. I choose to do it in this manner, as some interviewees preferred to stay anonymous, so using the same reference ensures coherence. It is worth mentioning, that all of the interviewees portray a different position in the field of child labour. Some have experience either specifically in India or Turkey, while some are more focused on combatting child labour on a more general level.

In appendix B, a table is included with all the documents which have been used for the content analysis. The documents have been selected based on the date of publication (none older than 10 years) and the thesis' codebook (Appendix C). The documents have been used to support the findings of the semi-structured interviews or gain different perspectives.

3.3. Data collection and choice of method

The collection of data mostly took place throughout the months March to May 2022. Before the start of the entire research process, it was unsure whether the COVID-19 pandemic would become an issue to the collection of data. Therefore, I decided to conduct my fieldwork mostly through desk research. Collection of secondary data, took place from February onwards, as the preliminary literature research also contributed to the final collection of secondary data I have used throughout the entire research process. In order to gain a better understanding of the entire field child labour and the detection of the risks of child labour, specific qualitative research methods were chosen. The rationale behind the selection of the methods, will be depicted in the following section.

3.3.1. Semi structured interviews

The reason for using semi structured interviews, is to be able to get an in depth understanding on the severity of child labour and the difficulty of tracing the existence of child labour. It is worth noting that the emphasis of the data collection lies on analysing which country specific factors make it difficult for fashion brands to detect child labour in their supply chain, whereby it is relevant to include various stakeholders in the semi-structured interviews. Throughout the interviews, I gained new insights, which led to the need for new participants. For this reason, I made use of snowball sampling wherein the participating interviewees provided me with new participants who related to the newly gained insights/subjects. The selection of these participants relied on their availability and knowledge on the specific subjects. As the majority of the participants were experts, this thesis applies to an expert discourse. In Bogner et. al (2018)' research on experts interviews, experts are defined "as people who possess specific knowledge that relates to a clearly demarcated range of problems and plays an authoritative role in decision-making of different kinds." (p. 657). Bogner (2009) argues the use of

expert interviews to be an efficient and concentrated approach to collect qualitative data. Especially concerning its shortened time cycle of collecting and processing data from experts, but also gaining access in instances of specific social spheres that are usually resolved around sensitive subjects (e.g. taboos)(Bogner, 2009). This is the case for the thesis' research topic, as discussing child labour is still considered as sensitive (e.g. by fashion brands, can harm reputation). Plus, some of the findings also concerned sensitive topics, such as the caste system or child labour among Syrian refugees, which were therefore portrayed as sensitive by the participating experts.

The semi structured interview guide (appendix D) relies on a topic list which constitutes a basic structure for all interviews. Topics which were touched upon in every interview were: child labour, the fashion industry, supply chains and CSR practices related to child labour.

3.3.2. Transcribing and Coding

All interviews were transcribed. Transcribing the interviews appeared to be time-consuming because most were in Dutch. I utilized Microsoft Word's transcribe tool for most of the transcription, although further scanning was needed to prevent flaws. Deductive and inductive methodologies were applied to analyse data from in-depth interviews. I used NVivo to arrange all transcriptions and codes. Qualitative coding helps to find themes and patterns in gathered data. It enables qualitative coding of unstructured or semi-structured material, such as interview transcripts. Qualitative coding makes the research more systematic and reliable (Delve, n.d.). To build a codebook (Appendix C), I used the primary research question, sub questions and the theoretical framework. Inductive coding has been used for transcribing and evaluating in-depth interviews.

3.3.3. Content analysis

Another qualitative method used during the data collection of this thesis, is the content analysis approach. Content analysis is relevant for understanding both the primary and secondary data. Before I explain the reasoning behind the usage of the content analysis approach, I will give a brief depiction of its definition and how it is put into practice.

Forman (2007) explains content analysis to be a set of methodical, rule-based procedures for analysing the informative content of textual material. As this thesis solely makes use of qualitative methods, I will only make use of qualitative content analysis. Qualitative content analysis concentrates on breaking textual material into manageable components by using inductive and/or deductive codes, and rearranges data to facilitate the formulation and validation of findings. Examining text information gathered from multiple sources using qualitative content analysis, which may be used alone or in conjunction with other empirical methodologies, is a flexible tool for investigating and comprehending complicated phenomena such as child labour (Forman, 2007). There are different forms of qualitative content analysis one can apply. One of the types used quite often by scholars in the social sciences field, is the type of "word count". Word counts entail finding and calculating the prevalence of certain terms

pertinent to the research issue. Analysis may also entail detecting similar terms, quantifying co-occurrence or proximity of words in the text, and recognizing words that are connected to one another (Hennink et. al, 2020). This type of content analysis will be used during the analysis of the semi-structured interviews.

An approach similar to qualitative content analysis, is thematic analysis. Thematic analysis is used for a comparable goal to content analysis, as the approach aspires to study content by dividing those in small parts and subject those parts to descriptive processes (Vaismoradi et. al, 2013). What is relevant about this specific type of analysis in terms of this thesis, is that it aims to seek and find commonalities which span across a group of interviews, or a collection of data. The comparative analysis conducted throughout the research process, makes use of two themes that allows one to think across the two case studies on India and Turkey.

3.3.4. Comparative analysis

In order to present the findings which help to provide support in answering the thesis' research question, I will make use of a comparative analysis. By analysing the primary and secondary data collected on Turkey and India, I aim to pin down the differences and similarities between both countries concerning risks of child labour. The comparative analysis has embedded a thematic analysis to maintain the same point of focus throughout the analysis. The themes inequality and visibility are used to think across both case studies. The contextual factors based on the findings are highlighted in chapter 6 by interpreting them in the two themes.

The use of quotes by the research participants will support the relevance of the factors mentioned in the comparative analysis. The structure of the comparative analysis uses the alternating method. By using the alternating method instead of the block method, I avoid having a descriptive nature of the thesis. This approach is used in order to emphasise the similarities and differences between both cases in a significant and analytical manner (Visvis and Plotnick, n.d.).

Table 2: Operationalisation of variables

<i>Variable</i>	<i>Operationalisation</i>
Child labour	Child labour can be measured based on the definition used in this research. The thesis uses ILO's definition of child labour: <i>child labour refers to work that deprives children (any person under 18) of their childhood, their potential and their dignity, and that is harmful to their physical and/or mental development</i> (ILO, n.d.). The minimum age differs per country, but ILO convention 138 constituted a minimum working age of 14 years. These criteria will help to identify/measure when something can be defined as child labour.
Supply chain traceability	In the context of child labour; to what extent can child labour be identified by the CSR practices conducted by companies (e.g. social compliance, monitoring, audits) throughout the supply chain.
Corporate Social Responsibility	CSR is measured based on the effectiveness of the CSR implementation and the capability to address child labour. This involves mapping all stakeholders and assess their engagement in CSR practices.
Supply Chain Visibility	SCV is measured to the extent a brand is able to gather data both upstream and downstream in their supply chain. The measurement includes the possible suppliers and buyers risks (e.g. child labour).

3.4. Positionality and limitations

In this section, I will touch upon the limitations I have met throughout my research and my positionality as a researcher during the data collection process.

When conducting research about a sensitive topic such as child labour, it is important to understand my positionality as researcher coming from the Netherlands. Child labour is no issue in the Dutch labour market in contrast to the examined case studies. What I noticed throughout the research, is that there is a cultural difference surrounding the concept of child labour between the production country and the buyers' country of origin. Thus, when conducting interviews with local actors in India and Turkey, asking questions about child labour should be phrased carefully and not directly. The questions I asked to the Dutch interviewees were therefore more direct in the sense that the participants were not directly faced with child labour in their own daily life and it did not concern their own culture. Some of the interviewees also highlighted the necessity to approach subjects such as child labour in a more careful manner with local actors.

Together with the majority of the interviewees, we decided that I could use the information given throughout the interviewees based upon upfront approval. Meaning, I would send my final analysis to the interviewees before the deadline. However, some of the interviewees were on holiday and did not respond back before the final deadline. Therefore, I anonymised those who did not respond back due to ethical concerns. For this reason, I only left their function within their NGO/institution (Interviewees 3, 9, 10 and 11).

No major limitations were encountered during the research. The only limitations which might have led to shortcomings, is the fact that it was rather difficult to get in touch with local NGOs/actors. The options to get into contact with local actors showed to be limited due to lack of responses or lack of interest to be involved in an interview. The possibility of conducting more interviews with actors who have more knowledge in terms of context and culture of India and Turkey, would allow for a better understanding of the factors that influence child labour. By primarily conducting interviews with specialists in the field of child labour who are originally from the Netherlands, the final analysis and debates are rather limited. Nevertheless, the majority of the interviewees have actually been on site and have experienced the cultural context of the issue. Yet, that will not be comparable to someone who has in fact grown up in the local context alongside the country's culture. As I only spoke to one participant with an Indian background and one with a Turkish background, it is difficult to form conclusions. The limited amount of participants with a Turkish or Indian background, should therefore be acknowledged in the analysis and kept in mind with the conclusion.

4. Geographical context analysis

One of the main criteria for selecting India and Turkey is that both countries are locations where America Today produces its products. As India and Turkey showcase a high proportion of child labour but are internally structured very differently, comparing the two constitutes an interesting comparative analysis for the research topic. Therefore, the following section will briefly depict both countries in relation to child labour and the garment industry. Furthermore, this section will also contextualise the garment supply chain by outlining the structure and the involved actors.

4.1. India

India is the world's second-most populated country, with 1.3 billion people. India's one-sixth population consists of ethnic groups who speak different languages (Britannica, n.d.). India is divided along religious lines after independence. India, with a Hindu majority, and Pakistan, with a Muslim majority; eastern Pakistan became Bangladesh (Britannica, n.d.). Many British structures (including parliament) survived. India is defined by its diversity of minority languages, castes, religious minorities, and tribes (Britannica, n.d.).

India's political system is heavily affected by the nation's caste system. The caste system has been in systematic use for over 3000 years (BBC, 2019). The system has been a prominent structural feature of Hindu society and is embedded in traditions, and caste rituals originated from a pre-colonial era. It also has been the dominating principle of social organisation in Hindu culture. Until around a century ago, the orthodox believed recognition of the caste system to be the single practical basis for assessing whether or not a person was a Hindu. In regards to religion, it did not matter if one worshipped one god, many gods, or none, nor did it matter how one defined "freedom" or opposed it openly, as long as one completed the tasks required for one's caste (Sana, 1993). Identifying the different castes and their position within Indian society is essential to interpreting the findings on the caste system. The caste system classifies Hindu society into four categories (from highest to lowest caste): Brahmins, Kshatriyas, Vaishyas and the Shudras (BBC, 2019). The categorisation of the different castes is based on a Hindu's work (Karma) and duty (Dharma). Hindus who are not classified into one of these castes will be categorised as Dalits or untouchables. Although the system is still in place and has an apparent impact on Hindu society, India's constitution prohibited caste discrimination in 1950 (BBC, 2019).

One of the issues faced by many sectors in the Indian labour market is child labour. According to Census 2011 (table 3), an estimated 10.1 million children in India are currently working. One can see a decrease in table 3 of children aged from 5-14 years with 7% in 2011 in contrast to 2001. The table shows a reduction of 21% in the number of main workers in this specific age group. However, the number of marginal workers expanded by 48%. Marginal workers are employees who solely work for less than 183 days a year. The majority are students, often working in the informal sectors (Save the Children, 2015). Furthermore, data depicts a vast decrease of child labourers in rural areas, while in urban areas,

it shows a slighter decrease. The decline can be explained due to the increasing rural-urban migration, which fuels the need for more child labourers in urban areas (UNICEF, 2021). Nevertheless, the current process to end child labour has been stalled since the first time in 20 years as a result of the COVID-19 pandemic and economic disruptions. The stall has put over 46 million children worldwide at risk of ending up in child labour by the end of 2022 (Economic Times, 2021). In the case of India, the pandemic resulted in the closing of schools, which left 247 million children possibly be pushed into child labour (UNICEF, 2021). In addition to the impact the pandemic might have on children in India, Dr Yasmin Ali Haque, UNICEF India Representative explains *"Children in poor and disadvantaged households in India are now at a greater risk of negative coping mechanisms such as dropping out of school and being forced into labour, marriage, and even falling victim to trafficking."* (UNICEF, 2021).

% age change of work force aged 5-14 years by their work status in 2011 as compared to 2001 and 1991			
Year	Main Workers	Marginal Workers	Total Workers
1991	26670	681	27351
2001	33486	8413	41899
Change in 10 years	25.56%	1135.39%	53.19%
2011	26,473	12,466	38,939
Change in 10 years (2001-11)	-21%	48% increase	-7%

Table 3 Child Labour in Delhi (Save the Children, 2015, p. 19)

In 2016, India's government established an Amendment act called the Child and Adolescent Labour (Prohibition and Regulation) act 1986, a law which "covers complete prohibition on employment or work of children below 14 years of age in all occupations and processes; linking the age of the prohibition of employment with the age for free and compulsory education under Right to Education Act, 2009; prohibition on employment of adolescents (14 to 18 years of age) in hazardous occupations or processes and making stricter punishment for the employers contravening the provisions of the Act." (Government of India, 2019) The garment industry is seen as one of the sectors that play an essential role in India's economy. Besides the large export flows, the industry employs a large share of the country's population. Tamil Nadu is known to be at the centre of the garment industry which is located in the South of India. Tirupur, situated in West Tamil Nadu, also often goes by "T-shirt city" as it includes around 80 per cent of India's entire output of garment export (Padmini et al., 2018). Besides Tamil Nadu, other textile production hubs are Delhi, Mumbai and Bangalore. The textile sector in Delhi is mostly output-driven, serving mainly the worldwide market and specific domestic markets (Save the Children, 2015). In Delhi, the apparel sector contains both organised and unorganised sectors. The organised sector is made up of licensed firms and producers subject to regulatory systems. Similar in size and activity to the organised sector, the unorganised sector thrives on subcontracting and outsourcing inside the supply chain (Save the Children, 2015).

The organised sectors of the garment industry are often heavily mechanised and based on demand. The mechanisation mostly happens in the first tier production units. Due to the high level of automation in these companies, there are fewer opportunities for employing unskilled labourers, let alone minors. In a largely fragmented clothing business, child labour manifests at the stage of outsourcing (Save the Children, 2015). The vast and expanding apparel industry in Delhi, along with the fast rise of the unorganised sector, allows for the employment of a significant number of trained and unskilled labourers. The unorganised sector, which is not supervised by labour rules, gives these businesses the option to employ children at cheap salaries and gives them the chance to assist their families (Save the Children, 2015).

4.2. Turkey

Turkey is a nation that lies between two different continents, Asia and Europe (BBC, 2018). The country is an upper-middle-income country with efficiently established institutions and public services such as health and education systems (UNICEF, 2020). Turkey's political system is based on a democratic parliamentary republic (Qatar Embassy Ankara, n.d.).

A home to many

Turkey has a population of over 85 million and is home to many ethnic groups. Over the last two decades, the country has seen a large influx of refugees. The nation is currently hosting the largest refugee population in the world, which puts a strain on governmental activities and structures (UNICEF, 2019). Around 4 million refugees are hosted in Turkey, of whom 1.7 million are children (UNICEF, 2019). 3.6 million refugees originating from Syria have been escaping violence and conflict in their country for over a decade. Around 98.5% of Syrian refugees have Temporary Protection Status (TPS). Most of them are residing in camps located in villages and cities already facing developmental struggles (e.g. infrastructure, housing). Therefore, the influx of refugees has only added more pressure on these cities (Worldbank, 2021). With assistance from the World Bank and the European Union, the Turkish government launched a comprehensive approach to the refugee issue. The course has been guided by the notion of enhancing the lives and livelihoods of both refugees and the urban and rural Turkish populations that welcome them (Worldbank, 2021). Furthermore, the Turkish response to the refugee crisis is grounded in the Temporary Protection Regulation (2014) and the Law on Foreigners and International Protection (2013) "to protect human rights of migrants based on national and international legislation and ensuring effective migration management." (Ministry of Foreign Affairs Turkey, 2016)

Even though Turkey is part of the 1951 Convention concerning the status of refugees, it is also one of the few nations to preserve the convention's territorial restriction provision. This restriction signifies that the Turkish government will solely take a legal role in safeguarding European refugees (Baban et al., 2016). Therefore, non-European refugees are authorised to remain in the nation for a restricted time, and some are granted conditional refugee status. While Güney (2021) argued the status as an improvement

to Syrians' accessibility to their legal rights, Baban et al. criticise the status of limiting Syrian refugees from building a sustainable livelihood in Turkey and restricting their access to education and health care and more (Baban et al., 2016). Syrians can gain access to benefits on the requirement that they are registered in their city of residency, yet registering is often perceived as an impediment for some Syrians since it restricts their freedom to migrate to a different city with greater job options (Güney, 2021). As a result, many were not able to work legally and therefore were pushed into the informal economy. In particular, Turkey's garment industry employed large amounts of Syrians, often unregistered. Because a large part of the industry remains unregulated, the employees do not work under a contract and thus do not receive social allowances (The Guardian, 2016). In 2016, a new law concerning a work permit was introduced, the Circular on the Working Permits of Foreigners Afforded Temporary Protection. Before this law, Syrians who had fled the country were unable to receive a working permit as they were under temporary protection status. Aras and Duman (2019) condemn the six-month residency requirement for obtaining a work visa in Turkey, explaining that the requirement should either be eliminated or reduced so Syrians may promptly join the formal labour market. A change of this requirement is vital to discourage child labour and urge families to make their children attend school.

Currently, there is still a group of Syrian asylum seekers who are undocumented. In 2020, there were 62,000 undocumented asylum seekers from diverse nationalities. Undocumented Syrians continue to endure social and cultural challenges which go beyond the existing laws. These challenges include the lack of accessibility to health services and education (Bahar Özvarış et al., 2020). To illustrate, 400,000 Syrian children cannot go to school, which does not include refugee children from other ethnic groups. (UNICEF, 2019). As a result, the risk of refugee children being pushed into child labour has become higher, as the government and NGOs cannot trace the remaining children.

Along with the rise of refugee flows into Turkey, child labour cases have similarly increased. The majority of working children between the age of 5 to 17, work in the service sector with 45.5%, in the agricultural sector the amount of working children accounts for 30.8%, and in the manufacturing sector, 23.7% (ILO, 2019). Furthermore, the ILO explains that there is a clear distinction between genders. While 70.6% of the working children are male, only 29.4% are female. The Turkish government has introduced several laws related to child labour. The current minimum working age set by the government is 15 years (Pietrow, 2019).

In the case of the garment industry, working children between 15 and 18 are only allowed to conduct labour in ginning mills and work in the spinning mills (with many restrictions here as well) (ILO, 2014). In the Turkish apparel industry, it is recognised that marginalised Turkish and refugee groups face the dangers of children's rights violations. Existing risks are exacerbated by the global effects of Covid-19 on impoverished families, particularly Syrian refugees (UNICEF, n.d.). Many Syrian children and migrating Turkish families are engaged in the extraction of cotton. These children work more than six

days weekly (FLA, 2016). While there are some statistics on the labour done by children on cotton fields, there are almost no comprehensive records on the usage of minors in cotton ginning, spinning mills, or textile mills for the apparel sector overall. Likewise, little is known regarding Syrian children's existence and labour standards in the Turkish cotton industry (Stop Child Labour, 2016). According to the Fair Labour Association (2017), frail government enforcement at the agricultural level leads to higher risks of child labour. As a result of illegal fees demanded by subcontractors, wages which are too low to sustain a family and the negligence of social benefits drive children into child labour practices (FLA, 2017).

4.3. The Workplace Index: India and Turkey

The following section will analyse the severity of child labour in Turkey and India, using the child rights atlas by UNICEF. In collaboration with the Global Child Forum, UNICEF created the Children's rights and business atlas. The atlas assists companies and industries in assessing possible and actual impacts on children's lives and incorporating children's rights into due diligence techniques and methods (UNICEF, n.d.). The atlas is supported by the Children's Rights and Business Principles. The ten principles can be divided into three different indices: the workplace index, marketplace index and community and environment index. Three indicators assess these three sorts of indices; legal framework, enforcement and outcomes. Throughout this thesis, I will only apply the workplace index, as this index is the only one which assesses the involvement of children in the workplace. In light of this research, it is worth mentioning that this index is not specified in the apparel industry but focuses on child labour in various industries (UNICEF, n.d.). According to the Children's rights atlas, the garment industry impacts children's rights mainly in the workplace.

The workplace index measures five different problem categories:

- Minimum employment age
- The risks of child sex abuse, forced labour, and child trafficking are considered the worst types of child labour.
- Children under the age of 18 who are involved in dangerous work
- Bad working circumstances: young employees, parents, and carers are in danger of poor working conditions (i.e., low wages, long working hours)
- Maternity protection: the scope of paid maternity leave gaps

Lastly, the indices also assess the appropriate response of due diligence by businesses per country. Depending on the seriousness of adverse children's rights impacts, it can range between basic, enhanced or heightened. The lower the rate of the assessment, the better the country performs in this aspect.

Based on the workplace index and the due diligence response, I have analysed both Turkey and India:

India (UNICEF, n.d.)

India's average scores some decimals higher than the global average of 4.4 (figure 3). Compared to the other indices, the workplace index scores the highest and therefore ends in the enhanced due diligence response needed from companies. Even though India's scores are higher in every segment, one might also see that in both countries, the legal framework receives a "basic" due diligence category. In India, both other categories reflect the need for an "enhanced" due diligence response. Furthermore, when compared to the global average, every indicator within the workplace index also appears to be higher. Solely, the marketplace index accounts for a lower average when compared to the global average. The low enforcement rate and outcome confirm the lack of effort by India's government to spread awareness among closed communities and execute workplace controls.

Index	Score ?	Global Average	Due Diligence Response ?
▼ Workplace Index ?	4.9	4.4	Enhanced
▶ Legal Framework ?	2.8	3.5	Basic
▶ Enforcement ?	6.3	5.5	Enhanced
▶ Outcomes ?	5.2	4.3	Enhanced
▶ Marketplace Index ?	4.2	4.6	Enhanced
▶ Community and Environment Index ?	4.8	4.2	Enhanced

Figure 3 Children's Right Atlas, data on India (UNICEF, n.d.)

Turkey (UNICEF, n.d.)

Turkey scores a more efficient average of 3.7 on the workplace index compared to the global average, which accounts for 4.4 (figure 4). The due diligence response is categorised as enhanced in Turkey. The legal framework indicator scores the lowest with 2.1 and shows the country's effort to implement international and national legal frameworks which aim to protect children's rights. The geographical context analysis confirms this as it outlines the legislation Turkey has implemented in terms of child labour. The outcome indicator accounts for 3.4 and shows above-average results in comparison to the global average of the effectiveness of legislation. Lastly, enforcement is the indicator that scores the highest rate with a 5.9, 0.4 above the worldwide average. The high rate shows the inefficiency of government mechanisms to combat child labour. While the enforcement and outcome indicators of the workplace index are advised to receive an enhanced due diligence response from companies, the legal framework indicator is categorised as a basic response.

Index	Score ?	Global Average	Due Diligence Response ?
▼ Workplace Index ?	3.7	4.4	Enhanced
▶ Legal Framework ?	2.1	3.5	Basic
▶ Enforcement ?	5.9	5.5	Enhanced
▶ Outcomes ?	3.4	4.3	Enhanced
▶ Marketplace Index ?	5.0	4.6	Enhanced
▶ Community and Environment Index ?	3.2	4.2	Basic

Figure 4 Children's Right Atlas, data on Turkey (UNICEF, n.d.)

4.4. The fashion supply chain

In order to grasp the issues in the garment industry, it is crucial to have a clear understanding of the industry's structure. Therefore, this paragraph will examine the garment supply chain. The complex nature of the garment industry supply chain challenges efforts of CSR practices by fashion brands. Mapping all stakeholders involved in the production process becomes rather difficult due to a lack of transparency, outsourcing and extensive subcontracting. Table 4 explains all levels of a fashion brand's

supply chain. It is worth mentioning that a brand has several actors per tier, and the number of actors involved increases when one goes upstream of the supply chain. The different actors are outlined in figure 5.

The content analysis examined an inconsistency of the structure of the garment supply chain. This was noticeable in a number of reports on the garment industry. When comparing the report by Save the Children, with the report by Fair Labour Association, two

Tiers	Type of firm	Function/practice
Tier 1	Garment Manufacturers	These companies acquire textiles and other materials to assemble the finished garment in accordance with the buyer-supplied design and quality criteria.
Tier 2	Spinning Mills	These companies manufacture cloth, yarn, or both. They may do all procedures, including dyeing, printing, and washing, in-house or subcontract them. Fabric manufacturers might get yarn from either domestic or foreign markets.
Tier 3	Ginning Mills	These companies transform cotton fiber into bales, which they then send to spinning mills.
Tier 4	Cotton Farms	Farmers cultivate cotton and export it to ginning mills for washing and processing.

Table 4: The four tiers (FLA, 2017)

distinctions stand out. Firstly, the report by Save the Children defines the final stage of the production process (finishing practices) as tier 5, while the Fair Labour Association (FLA) categorises it as tier 1. Secondly, Save the Children counts 5 different levels in the supply chain, instead of the 4 levels stated by the FLA. This thesis adheres to the FLA report's four-tier structure, which demonstrated to be the most common among research on child labour in the apparel industry.

The supply chain from cotton to garment includes many actors as outlined below:

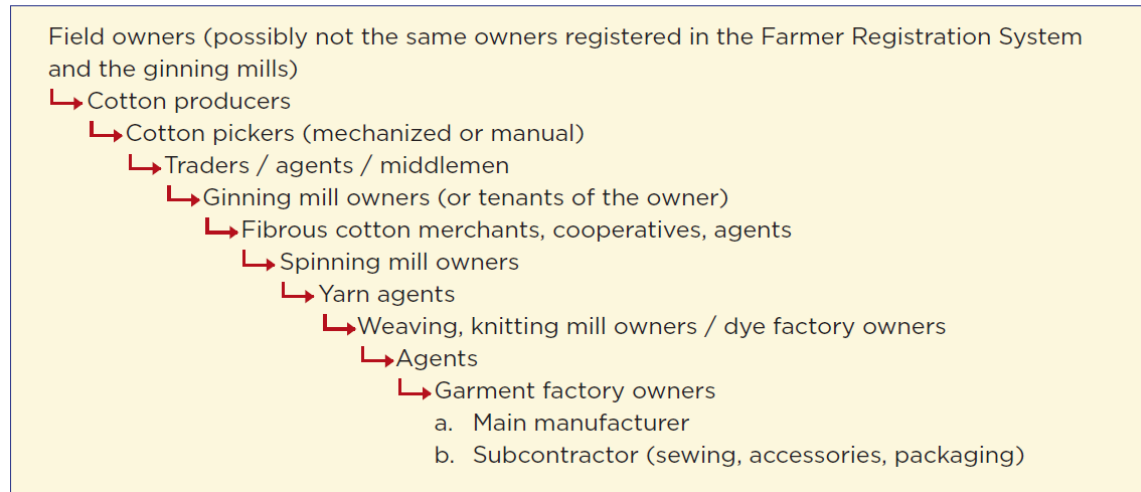


Figure 5 Actors involved in garment supply chain (FLA, 2017)

Structure of analysis

The following two chapters conduct an analysis of the collected data. The focus lies on understanding the different narratives of the research participants, but also on the understanding of the different narratives of all parts of the supply chain. The first chapter analyses the garment supply chain and maps out the probability of child labour in each level. Additionally, it elaborates on the existing perspective on the AGT and the role of Dutch companies in the fight against child labour. The second analytical chapter demonstrates how factors related to inequality and supply chain visibility in India and Turkey, affect the traceability of child labour.

5. Analytical Chapter: A risk assessment of child labour in the garment supply chain

This chapter examines the garment supply chain and child labour risks at every stage of production. Firstly, the Turkish and Indian garment industry's supply chain will be analysed to determine its structure and child labour hazards per tier. Secondly, the key findings assess which supply chain tier is most prone to child labour. Thirdly, I will examine the effectiveness of child labour due diligence standards and the role of Dutch fashion brands. To research the influence of contextual factors in Turkey and India on child labour traceability, analysing child labour in every tier of the textile sector is vital. By separating the tiers of the supply chain, it is easier to understand the reasons for child labour and why dangers are higher at specific levels. This analytical chapter relies on content analysis of NGO reports, policy reports and expert interviews.

In the next section, a risk assessment will be done of child labour in all tiers of the garment supply chain. To have a chronological order of the production process, the analysis will start at tier 4 (extraction of the cotton) and end at tier 1 (before exportation to the buyer).

5.1.1. Fourth tier: the Extraction of Cotton

The production of cottonseeds and cotton is categorised as heavy and dangerous work. The extraction of cotton demands a lot of physical strength and practices involved with dangerous pesticides. According to a report by the EC (2021), these are only two reasons why agricultural practices conducted by children can be classified as the worst form of child labour. The EC report states that 70% of all working children are employed in the agricultural sector, taking the lead among all other sectors. It is more common for younger children to be employed in cotton production, exposing them to heavy work, dangerous chemicals and high temperatures and making long hours (EC, 2021).

In the case of Turkey, I examined the Fair Labour Association's (FLA) report of 2017. The report emphasised the small cotton farms that are high risk of child labour and challenged the traceability of working children. In these smaller farms, cotton is handpicked instead of extracted through

mechanisation. Furthermore, local Turkish institutions argue that most cotton extraction is mechanised but cannot provide data to support the statement. The rest of the work is left for the farm owners' additional family members, including children. During the extraction of cotton, farmers start hiring temporary and migrant labourers. This practice is, therefore, often conducted by migrant families or nomad families (Interviewee 4, partnership developer at UNICEF; FLA, 2017). Depending on the season, these nomad and migrant families relocate to where they may find work, usually in agricultural practices. In addition, the ILAB (Bureau of International Labour Affairs) report on Turkey (2018) also explained that the seasonal nature of agriculture work often leads children to engage in agricultural practices. In the case of Turkey, this is a big issue concerning the large refugee flow. Young refugee children are engaged in cotton picking and therefore miss school hours. Chapter 6.5 discusses a more in-depth analysis of the involvement of Syrian refugee children. Most workers in Turkish cotton farms are employed through intermediaries (FLA). In 2010 the Regulation on Agricultural Employment Intermediation was established to prevent illegal hiring processes.

Nevertheless, intermediaries continue to conduct hiring processes ignoring this law by employing workers without contracts. The uncertainty gives the workers a vulnerable position towards their employers. Turkish national legislation categorises seasonal agricultural work as the worst form of child labour (ILAB, 2018).

Similarly to Turkey, interviewee 7 (anonymous) argues the high probability of child labour in Indian agriculture. In particular, the interviewee pointed toward the role of family farms in India in the fourth tier. India is one of the top three cotton producers (Voora et al., 2022). In 2021, India's cotton export accounted for 10 billion dollars, placing them second behind China (Workman, n.d.). This increase of demand in cotton is apparent in the amount of children working in Indian cotton production. In the cotton-producing provinces, 30% of all working children younger than 14, participate in family farms. Young children's health and safety are at risk when conducting this labour because of the high temperatures, difficult loads, toxic pesticides, and lack of protective gear. The kids may be migrant labourers who reside far from their relatives in some instances (Ward and Mishra, 2019). According to Ward and Mishra, prevention mechanisms as well enforcement is challenging on the agricultural level. India's workplace index reflects this challenge, which shows a negative enforcement rate. ILAB's 2020 report on the worst types of child labour in India mentioned concerns regarding the trafficking of children to work on cotton farms.

5.1.2. Third tier: Ginning Mills

In the third tier, extracted cotton from the fourth tier is processed, cleaned and transformed into usable cotton. Subsequently, the cotton will be compressed and kept in bundles and exported to second-tier spinning mills. The majority of the ginning mills buy their cotton from agents. A smaller percentage of the ginning mills buy directly from cotton-producing farmers. According to the FLA, most of the time,

ginning units and cotton farmers do not maintain a long-term relationship. Instead, the focus lies on the cotton's quality and price. Thus, ginning mills often have no idea where their cotton comes from and are unaware of the working conditions of the employees working on these farms (FLA, 2017). The study by FLA showed that ginning mills do not consider the working conditions, and it does not affect their buying outcome. FLA noticed during their study that many of the practices executed in specific tiers overlap.

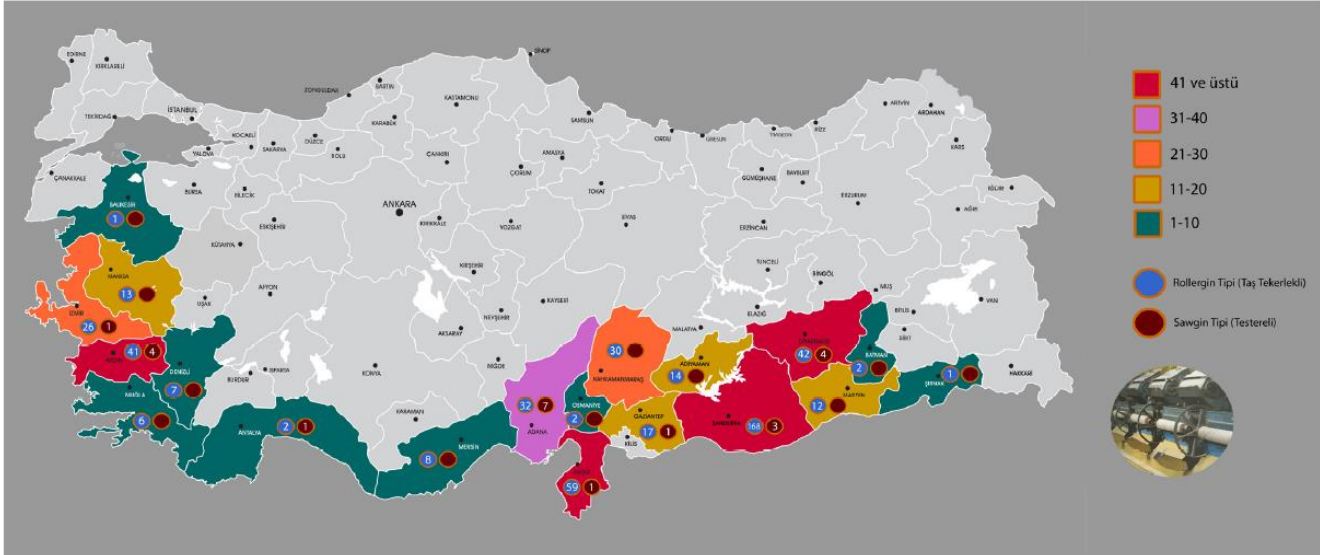


Figure 6 Distribution of Ginning Mills in Turkey (FLA, 2017)

Save the Children (2015) and FLA (2017) found in their studies that ginning mills mostly hired seasonal and temporary labourers. The hiring process of the employees often happens through agents, whereby the managers of the ginning mills rarely conduct interviews to hire employees. As a result, the representatives are not familiar with the background of their workers and their skills. Figure 6 shows the distributions of Turkish ginning mills. One can see how all of the ginning mills are located at the southern borders of Turkey. Seasonal work often attracts migrant workers, which can be explained by its location next to the Turkish-Syrian border.

None of the interviewees mentioned the ginning mills in relation to child labour. The interviewees did argue that the upstream levels of the supply chain present a higher risk of child labour and traceability.

Work in the ginning mills has been categorised as dangerous work by the Turkish national legislation but allows children older than 16 to be employed in these practices (ILO, 2014). The Indian report of the worst forms of child labour by the ILAB (2020) did not include work in the ginning mills. However, the report includes cleaning and shredding cotton, a practice conducted in the third tier. This practice is categorised as hazardous and makes it illegal for children to be employed in this practice (minors older than 16 years as well)(ILO, 2014).

5.1.3. Second Tier: Spinning mills, fabric and yarn production

The second tier of the supply chain concerns the spinning mills. Spinning mills are used to manufacture yarn or cloth and can include the processes of dyeing, printing and washing the materials. Furthermore, the second tier involves yarn and fabric production.

India: Minor practices

The majority of the interviewees have pointed out embroidery as a standard practice involving children in India in tier 2. Embroidery often takes place at home, either within a family business or, in the case of India, in an Addas. Addas are household-based units, where labourers who are nonrelated work together (adults and children). Addas and household units are most likely a result of subcontracting. Chapter 6.2.2. will discuss more on the role of family businesses.

In the context of these minor practices, some mothers want to work from home so they can oversee their children, but doing so raises the chance that everyone will be involved. Only if one is in contact with regional groups and aware of where to look can one discover it (Interviewee 1, director at Arisa).

Outsourcing specialised practices such as cutting threads or embroidery also often happens in closed communities. According to the report by Save the Children (2015) and interviewee 5 (Senior Program Manager at GMACCL), there are a few regions where such practices are traditional and have been in place for years. Specifically, embroidery is a traditional practice conducted by Muslim communities around Delhi. Interviewee 5 explained that children's involvement is more common in these communities. These communities are mostly closed to outsiders, posing a challenge for companies to gain visibility of the units involved in the upstream practices. Interviewee 5 also explained that it is not just the closed nature of these communities but also the government's negligence to increase transparency. The government's lack of enforcement enables these practices to exist further. This lack of enforcement has also been reflected in the workplace index (chapter 4.3) and demands the need for enhanced due diligence response in both Turkey and India. Article 3 of the ILO Convention 182 categorises spinning mills as hazardous work (ILAB, 2020).

Turkey: Short term relationships between tiers

The relationship between ginning and spinning mills is similar to the relationship between tier 3 and 4 units. In Turkey, spinning mills mostly buy yarn or fabric from agents instead of ginning mills. Direct contact between the tier 2 spinning mills and the tier 3 ginning mills is not very regular. The relationship is mostly not based on a contract, and spinning mills solely focus on the quality and the amount of cotton they receive. The lack of contact between the ginning agents and the spinning mills leads to the tier 2 units using different ginning mills yearly. Short-term relationships contribute to the large number of stakeholders involved in the garment supply chain. Hiring ginning agents is interesting for tier 2 suppliers, as they have an entry to domestic and international markets. However, the FLA found that the

spinning mills do not know about the systemic approach of these agents and do not conduct checks at these units. Therefore, the working circumstances and possible risks of child labour do not impact their choice to buy from the ginning agents. The only determining factors for spinning mills are the quality and price of the cotton. Contrastingly, the Turkish legislation of the ILO Convention 182 categorises work in spinning mills as heavy and dangerous but allows minors over the age of 16 to work in spinning mills (ILO, 2014). In terms of dyeing and bleaching the finished garments, minors older than 16 are prohibited from employment. Additionally, this type of work is categorised as hazardous (ILO, 2014).

A lack of trust

7 out of 11 interviewees pointed out that there is a lack of trust among the involved stakeholders. The further one goes upstream of the supply chain, the less connection there is with the suppliers. First-tier suppliers and buyers often have daily contact, which allows for a long-term relationship. Building a relationship with the suppliers takes time and investment. As the first-tier supplier takes the lead, the buyer has no information regarding the second-tier supplier. The lack of information also applies the other way around: the yarn supplier has no idea where his material will end up. Moreover, interviewee 4 explained, *"the less there is a connection with the brand and the less contact you have, the less you can pass on values that are important to you, which creates less trust."* One of the main reasons for this distrust is that most of the supply chain responsibilities are left with the suppliers. For example, tracing and monitoring becomes a task for the suppliers, who often do not have the resources to invest in sufficient tracing strategies. Interviewee 4 explained, *"That first tier supplier cannot guarantee or does not always have a sufficient grip on what goes on behind in the supply chain, but sometimes they also find it scary to say that to the Dutch brand, because they are afraid that if I cannot guarantee that, then they don't want to work with me anymore. And that's why I emphasise the factor trust."* Therefore, interviewees 4, 9 and 3 emphasised the necessity of long-term and equally built relationships to achieve efficient collaboration. The lack of distrust portrays an imbalance of accountability between the stakeholders. Hence, the agency theory, as discussed by Merminod and Paché, can be applied in the garment production process, perceiving how both principal and agent are faced with challenges to gain traceability.

5.1.4. First tier: Ready-made Garment Sector

In the first tier, the products are manufactured into the final product before being sent to the buyer. The first tiers mainly consist of direct suppliers, who have regular contact with the buyers. Interviewee 10 argued that the lack of efficient control and inspection mechanisms contributes to the existing risks of child labour. Companies often hire local companies to conduct audits to make random checks in the tier 1 factories. The interviewees showed to have varying opinions on the effectiveness of these auditing strategies. Interviewee 10 explains the inadequacy of conducting audits to trace child labour, *"In my opinion, social audits are not an adequate tool to detect issues such as child labour, because child*

labour is very much a hidden practice. It's not something that any company or any supplier or subcontractor would openly show."

Interviewee 11, a Turkish quality auditor hired by America Today, described detecting child labour through audits as complex. For many children, it is difficult to estimate whether they are of the minimum working age. Interviewee 10 agreed on the difficulty of estimating a child's age, not only for the auditors themselves but also for the children. In some cases, children have no idea how old they are, as they do not have birth certificates or attend school. This difficulty is the case in both countries. In addition to checking identifications, for children to know their age is critical if one wants to detect child labour. Furthermore, an auditor must understand how to execute age verification in order to be able to identify a child labourer sufficiently. According to a report by The Centre for Research on Multinational Corporations (SOMO) and ICN (2014), children also work in formal factories due to the failure of audits to detect child labour and employers hiding child workers.

Human rights impact assessments can replace social audits to identify child labour. This strategy gives a more in-depth inspection by employing a third party instead of completing a 2 hour, preannounced check (Interviewee 10). The Danish Institute has employed this strategy and proved its effectiveness. By talking to local stakeholders, the human rights impact assessment helps comprehend the background of the tier 1 factory. Through this, one might understand why child labour happens and why parents let their children work. This approach's outcome is a better understanding of the local context.

Indirect child labour

Interviewees 3 and 4 touched upon indirect child labour. Child labour extends beyond direct hiring. Due to poor incomes and lengthy hours, the eldest children must care for the younger ones. The eldest children cannot attend school from a young age, which contradicts the principle of being a child and having the right to education. Indirect child labour can occur from parents not earning enough, pushing children into various industries. Examples are cleaning shoes, rag picking or selling products on the street. Indirect child labour can be visible in all tiers.

The finishing process of the garments (depending on the practice conducted) is categorised as hazardous or even worst form type of work. The Turkish national program for the elimination of child labour classifies labour in small shops as the worst type of child labour. Nevertheless, the legislation does allow minors older than 16 years to be employed in manufacturing jobs, even though labour in industrial firms is classified as the worst type of child labour (ILAB, 2018). The ILAB (2018) emphasises the inconsistency regarding the minimum working age constituted by the Turkish national legislation. The confusion can lead to different understandings of the legal minimum age among sectors.

5.2. The high risk tier and efforts by Dutch brands

Now that the garment supply chain has been outlined, the following section will discuss which tier is most prevalent in child labour based on the results. When I asked the interview participants which tier in the garment supply chain presents the highest risk of child labour, all experts emphasised that the highest risks are found in the upstream levels of the supply chain.

"Most child labour in fast fashion is not so much in the first tiers, but in the small contractors further down the chain up to the level of the cotton fields" – Interviewee 3 (Managing Director at NGO)

While most interviewees agreed that the first tier is most visible to companies, they also agreed that this does not indicate that child labour at the first level can be fully avoided. The interviewees and the reviewed literature discussed the difficulty of reaching full transparency beyond the first tier. America Today has focused on eliminating child labour in collaboration with the FLA and UNICEF and outlined their progress in the 2020 Sustainability report. In tier 1, transparency accounted for 100% in 2020, and tier 2 showed a transparency rate of 78% in 2020 (America Today, 2020).

In a document on hidden child labour, GoodWeave (n.d.) points out that the majority of regulations and business due diligence activities concentrate on tier one manufacturing. Upstream segments account for 28 and 43 per cent of child labour in global value chains among all geographies. According to Save the Children (2015), most child labour is found in the last two tiers. Interviewees 9, 4 and 10 emphasise the need for a shorter supply chain.

In order to be able to conduct a risk analysis of a supply chain, it is crucial to map out all the actors involved in the production process, from tier 1 to tier 4 (Interviewee 8, Senior Consultant at MODINT).

5.3. The role of Dutch fashion brands

The following section assesses Dutch companies' efforts to tackle the issues in the different tiers that cause child labour. In addition to the difficulty of achieving complete supply chain visibility, many businesses are also cautious about revealing information on child labour, as being associated with child labour carries a great deal of weight. Interviewee 4 explained that the public's perception of child labour heavily depends on the nuances of the story a company tells its customers. When comparing environmental issues with child labour, having possible cases in one's supply chain is perceived as much worse than not being CO2 neutral (Interviewee 4). Interviewee 3 agreed with this statement and explained, *"Companies are sometimes hesitant about transparency on child labour. Communicating about this is very sensitive. Companies see it as a major reputation risk. In addition, companies are afraid of being sucked into large projects that cost a lot of money and time and on which they (can) hardly influence."* Interviewee 8 acknowledged this statement considering the complexity of the supply chain. A brand must be aware of what is happening inside its supply chain to connect with its consumers effectively. Interviewee 4 also recognised this issue in her communication with brands and explained

that companies preferably do not use the term child labour and instead refer to children's rights in a discussion.

Nonetheless, the interviewee has seen some progress in brands' external communication. Interviewee 4 explained that companies' motivation to make improvements to their supply chain still differs per company. While some companies do not need the pressure from due diligence laws, others do not have intrinsic motivation to make a change and only will make a change with the risk of facing possible penalties.

In 2016, the Dutch Agreement on Sustainable Garments and Textiles (AGT) was formed to tackle the negative consequences of the fashion industry. The agreement's focus scopes the entire industry, ranging from environmental to social impacts (i.e. child labour, forced labour, labour standards). The agreement was a collaboration between NGOs, fashion brands, trade unions and the Dutch government. To realise the agreement, a secretariat has been put into place to assess, advise and facilitate the plans and activities of the agreement. The secretariat was hosted by the Social and Economic Council of the Netherlands (SER)(IMVO, n.d.). The agreement ended in December 2021 and was evaluated by the Royal Tropical Institute (KIT). The KIT advises the AGT for future prospects in several ways: 1. Stress cooperation between different companies to increase the impact of due diligence, 2. Extent stakeholder engagement further down the chain, 3. Through collective agreements among initiatives, companies can gain more leverage, and 4. Create more best practice tools on complex issues (e.g. child labour) (KIT, 2022).

In the light of the thesis' focus on Dutch companies, I asked the interviewees about their perspectives on the AGT. With this, I mainly focused on the effectiveness of the due diligence standards, the collaborative nature of the agreement and specifically how the agreement impacted child labour in the fashion industry. The interviewees showed to have different opinions on the effectiveness of the AGT and its effect on child labour.

Interviewee 5 specifically stressed the need for a more significant number of companies to improve their due diligence standards. The amount of participating companies, and companies showing efforts to implement due diligence in their business model, is still too little (interviewees 5 and 3). Interviewees 3 and 5 stances towards the AGT show to overlap, as both explain Dutch brands to be small players on the global level, *"Dutch brands are a small player on a global level, certainly next to the Chinese, American, etc., and the number of companies that wanted to sign the clothing covenant is limited in the larger group of companies. But great initiatives have been taken that others in Europe now want to follow up. So better to focus on the front runners!"* Instead, both argue that the focus should lie on national or international legislation to pressure companies to implement and improve their due diligence standards.

A spokesperson of America Today addressed the difficulty of being a smaller brand, *"A lack of leverage is also a challenge for smaller brands like America Today. We also depend on our suppliers and are*

often too small to be able to make all kinds of demands. Especially when you consider that we may be a few per cent for tier 1, and then especially small for tier 4." For this reason, the brand specifically emphasised trust among stakeholders.

Interviewee 4 distinguished between the general success of the AGT and its influence on child labour in the garment industry. From a general perspective, this interviewee believed that due diligence procedures have contributed to the sustainability of businesses. Specifically, if due diligence becomes a legal requirement, businesses will be motivated to implement due diligence. In terms of child labour, the interviewee explained the following *"it can also ensure a level playing field, so that everyone does the same, so that if everyone sets those standards high, then you are no longer the one that sticks its neck out above the ground."*

Interviewee 2 (Former Director at the Indian committee of the NL) and interviewee 3 highlight the use of multistakeholder initiatives, which can be seen as a part of the solution against child labour. However, in practice, it proves to be more challenging, considering child labour is still defined as a taboo subject for many companies, which impedes them from sharing their own experiences on the subject. The latter is the case for companies that did not participate in the AGT (Interviewee 2).

According to interviewee 8 the AGT has laid a foundation for the companies participating in the agreement. Nevertheless, the interviewee also explained that many of the concerns addressed in the AGT are rather geopolitical challenges and cannot be solved by the businesses alone. Furthermore, interviewees 8 and 9 argued that the duration of the agreement (5.5 years) was too short to make systematic changes.

5.4. Conclusion

To reiterate, the interviewees stated that child labour is especially common in the upstream supply chain. However, the first tier must not be ignored. Some minor practices are still outsourced, but the first tier is mostly organised. Child labour in the first tier is more apparent in practices where the focus lies on the finishing details, such as cutting threads. The buyer loses track of his supply chain while outsourcing and agents contribute to stakeholders' lack of transparency. In every layer of the supply chain, short-term supplier connections recurred. Without permanent or contractual connections, suppliers know little about the labour conditions of the employees. This lack of visibility is especially apparent in unorganised and informal units, such as family businesses or home-based workers. These smaller units were apparent in all tiers and can be interpreted as a supply chain visibility issue and a continuation of employer-employee inequality. Moreover, the suppliers' buying decisions lacked transparency. Many stakeholders emphasised product quality and pricing over workplace norms.

6. Analytical chapter: Understanding child labour as a supply chain risk and as a consequence of inequality

This chapter will analyse the findings concerning the themes of supply chain visibility and inequality. The analysis is based on the recurring themes that were found during the semi-structured interviews and the content analysis and will be applied to both case studies. The chapter will be structured as follows. Firstly, the findings concerning visibility will be showcased: subcontracting, deficiencies in child labour legislation and the cultural differences among stakeholders involved in the garment chain. Secondly, the findings that can be perceived through the theme of inequality will be demonstrated: the caste system in India and child labour amongst Syrian refugee children. All findings will be interlinked with the concept of TfS.

6.1. Subcontracting: Losing control over the supply chain

As aforementioned in chapter 5, subcontracting parts of the supply chain process, increases the complexity of the garment supply chain. Subcontracting has been mentioned several times by the majority of the interviewees as a factor to challenge traceability. Subcontracting is used in different ways. While most interviewees discuss outsourcing to independent informal garment units, during the high season, factory owners also use temporary workers. These workers are not directly employed by the factory owner but by a subcontractor. The factory owner pays the subcontractor, and the subcontractor pays the employees. This makes it difficult for the supplier to control the employees' working standards. Interviewee 1 pointed out that the buyers are often unaware of the fact that half of the factory employees are not directly employed by their suppliers.

Nevertheless, SOMO and ICN (2014) particularly point out that the strict deadlines set by the buyers trigger the necessity of subcontracting. Companies outsource manufacturing processes to other facilities and workplaces to meet deadlines and unanticipated demands. Subcontracting is cited as supply chain disruption, particularly in Turkey. Interviewees 4 and 11 agreed with SOMO's and ICN's claims about buyers pressuring suppliers with excessive demands. Due to time constraints, suppliers see less value in having a certified manufacturing unit to satisfy buyers; interviewee 11 explained:

I: How are subcontractors used in Turkey?

III: if you are using subcontractors, little ones, and for example I know that situation because, I used to make the production and production planning also. Sometimes you get stuck. You have lead time. And your fabric is coming on that date and all your subcons are full. What you will do, is search a new subcontractor. Buyer must be satisfied. But if you have to rush to make that production happen, sometimes they skip the certified part.

I: Okay and is it the supplier who is looking for the subcontractors? Or is it the buyer that does that?

III: No, the supplier is looking for the subcontractors, it's the suppliers' responsibility. And yeah, if they get stuck they can rotate the wrong way. It's very easy.

Similar to what was noticed throughout chapter 5.1, the self-interest and behaviour of the different actors reflects the existing imbalance of responsibility.

On the other hand, a representative of America Today explained that they try to avoid making excessive demands to their suppliers e.g. by checking if there is enough capacity in the factory to fulfil an order, asking for feedback on buying practices, and having open conversations with suppliers for example when the need for subcontracting arises.

Interviewee 4 pointed out subcontracting as an issue, particularly, from tier 2 onwards. With the first-tier supplier, the buyers still have regular contact. The complexity and amount of stakeholders mainly increase when one goes more upstream into the supply chain. The interviewee emphasises that it not only concerns the outsourcing of manufacturing processes, but the amount of stakeholders also broadens due to the number of sub materials which are needed to finish the end product. *"A tier 1 supplier could have 10 tier 2 suppliers, and these suppliers all have 10 suppliers as well. So it fans out and the deeper you go, the more different suppliers you encounter. (...) But it can also be the case that even if it is only about yarn, that you have 5 different yarn suppliers, adding to the already large amount of suppliers."* (Interviewee 4).

Preventing subcontracting has proven to be complicated. Interviewees 1 and 9 emphasised that an open attitude is essential to understand supplier's choices. Interviewee 9 (Senior Policy Advisor of an advisory and consultative body) elaborated on this statement, *"I would not say you have to stop subcontracting, but you need to understand that it is happening and why it's happening and what your role in this process is."*

On the other hand, interviewee 4 stressed the necessity to reduce the number of suppliers in a production process. Some fashion brands have over 200 suppliers, making relationships between suppliers complex and challenging to maintain. Instead, shortening the supply chain to allow for a better relationship with one's supplier is argued as a possible solution. Nevertheless, interviewee 10 pointed out that if a brand wants to shorten its supply chain, it should not directly cut the ties with the subcontractors. Cutting ties will not prevent child labour from persisting, and many of the employees' salaries rely on the demands of international buyers.

6.2. Addressing loopholes in Turkish and Indian child labour legislation

Traceability attempts have worked to build a visible pathway into the upstream supply chain in past years, although these initiatives may be limited by regulatory constraints (UNICEF, 2020). Analysing the national child labour law in both case studies, therefore, contributes to understanding how firms'

traceability might be challenged due to ineffective regulation. The Indian and Turkish governments have ratified the ILO Convention concerning child labour rights (182 and 138). Yet, both national labour laws prove to have loopholes which allow for child labour to exist and challenge the traceability of possible child labour risks. The interviewees argued that efficient legislation could enhance the traceability of child labour and decrease supply chain risks.

6.2.1. Turkey: Confusion about the minimum working age

In Turkey, there is a lack of poor compliance with laws which protect children's rights. While the government's role in this situation is crucial to enforce legalisation, the government in Turkey is argued not to have enough capacity to enforce the laws actively. Interviewee 11 stressed the government's inability to inspect the upstream segments of the garment supply chain. The government is more present in the first tier, such as large factories with over 80 employees. Three deficiencies in national legislation can be observed:

Firstly, inconsistency regarding the minimum working age of children in Turkey. The government has distinguished among industries regarding the minimum age of working children. ILO's 2014 report on Turkish national legislation on hazardous child labour shows that the minimum age for admission to employment is 15 years of age. The minimum age for hazardous work is 18 years old. However, the government states in the same document that minors over the age of 16 who have followed training at special technical schools to gain specialised skills in a specific profession are permitted to work in hazardous work (ILO, 2014). This exception undermines the idea of minimum age, as children are still allowed to work in dangerous industries under the condition of requiring a specific skill set. ILAB's 2018 report on Turkey also addressed the inconsistency in minimum working age and perceived it as a gap in Turkey's legal framework. Interviewee 11 pointed out that it is legally demanded to receive permission from the child's parents. Permission is required for children younger than 16. Nonetheless, this practicality is not mentioned in the national child labour law.

The second loophole can be derived from the ILAB report. It concerns the *Regulation on the Principles and Procedures Governing the Employment of Children and Young Workers*. Even though national law classifies seasonal and migratory work and work in small units/industries as the worst forms of child labour, it does not rule out seasonal migratory agriculture practices. Since cotton extraction is a seasonal type of work (e.g. handpicking cotton by children), children have a high risk of ending in agriculture work.

The last loophole applies to small industries and agricultural practices and concerns the Labour Law (4857). This law is currently in practice and comprises regulations on contracts, work conditions, social assistance, legal age, and employee welfare for all industries, including agriculture. However, enterprises (including agricultural) hiring less than 50 people are not included in this law. This allows for a severe legislative deficiency regarding the regulation of workers' rights in cotton extraction. This

loophole in Turkish legislation allows for the continuing exploitation of vulnerable employees. Interviewee 11 agreed that tier 4 is too far down for the government to execute inspections frequently. Therefore, child labour is less on the radar, allowing it to persist without any consequences.

6.2.2. India: Excluding family businesses from the child labour act

Interviewees 2 and 7 emphasised the significant progress made by the Indian government regarding the prevention of child labour. Interviewee 7 further elaborated on the implementation of a zero-tolerance policy regarding child labour, setting a minimum working age of 18 years old. However, interviewee 10 disagreed with this statement. Like Turkey, the Indian government lacks the capacity to enforce its child labour laws, as the government does not have the resources and manpower to conduct inspections. Interviewee 10 pointed toward the inefficiency of the government's control and inspection mechanisms, describing the labour inspections as more generally focused on, e.g. fire safety, and therefore are unable to detect hidden issues such as child labour. This is one of the reasons why outsourcing ends up being cheaper and more attractive for companies. Cheaper due to lack of enforcement and efficient child labour laws (Interviewee 9). Power (2019) included third parties within agency theory, which can also be applied to the government. In this context, the government does not govern its agency through the supply chain, which can be portrayed through legislation.

One of the main loopholes in Indian labour law relates to family businesses. The newly introduced child labour act (2016) prohibits the employment of children under the age of 14 in hazardous jobs. However, the law does not include hazardous practices conducted in family businesses. Many children's rights advocates are not confident that the new amendment would eradicate child labour since the need to work frequently trumps education (Tewari, 2016). Employing children in family businesses continues to be justified with the new legislation, including home-based work and farming (Nagaraj, 2016). This loophole contrasts with ILAB's 2020 report on the worst forms of child labour, where Indian legislation classifies agricultural forms of work as the worst type of child labour. Family businesses are argued to form a complex system between business, ownership and family, and can vary per culture (Kalé et al., 2020).

During one of the interviews, interviewee 10 brought up this flaw and questioned the nature of family businesses: *"As soon as it interferes with education and the child works instead of attending school, then it's child labour. So working in a family business doesn't mean that the conditions are per se better than when you work elsewhere. So it can still be, you know, in a dark basement where a child is sewing buttons."*

Additionally, interviewee 1 agreed on the questionable nature of family businesses by defining it as a grey area in Indian legislation. Nevertheless, the respondent pointed out that hiring home-based workers does not necessarily have to be an issue. Many women have understandable reasons to work at home; if

the conditions are adequate, it does not have to be a problem. The buyer should be aware of the existing home workers and make sure it does not involve hazardous working conditions (Kara, 2019).

Family businesses often occur in unorganised units, which can be seen as an interruption to reaching supply chain visibility. According to the literature review, this interruption can be classified as a buyer risk (Somapa et al., 2018). The traceability framework by Kumar et al. (2017) builds on traceability information, and conforms to the local government accreditation and laws. Hence, adequate labour laws have to be in place to allow traceability efforts to function significantly. In the case of India's Prohibition and Regulation Bill, forming minimum required traceability standards is challenging (Kumar et al. (2017).

6.3. Cultural differences and different narratives among actors

In India, family businesses form the majority of the country's GDP. Family businesses add to GDP and are also one of the most prominent creators of labour in the Indian economy (Dewan, 2021). Involving children in one's family business and teaching them the skill of the industry, is quite common in India. Interviewee 3 built on this statement by explaining the normalisation of child labour *"in some cultural contexts child labour is completely normal and accepted, while school is not. This may also differ for boys or girls."* Examining a country's cultural norms and values and the perception of child labour is crucial in the fight against child labour. Therefore, the following paragraph will discuss the role of culture in the traceability of child labour.

The definition of child labour shows to differ per country. The interviewees with a Dutch nationality and expert background all mentioned that they use the definition by the ILO. In section 2.4, the scholarly debate on child labour is demonstrated while also showing that the thesis follows ILO's definition throughout the research. Keeping this term in mind, many countries where Western companies outsource their manufacturing processes have various definitions for child labour. The inconsistency among stakeholders in the garment supply chain and their different narratives in relation to child labour challenges the visibility and traceability of child labour. According to interviewee 10, a company needs to keep these different notions in mind when addressing an issue such as child labour to their supplier:

"And so when we come with our strong rules and we are saying this is not in line with the international convention, often people can say; but look, this is the reality on the ground. This is our situation, who are you to tell us whether this is right or wrong?" – Interviewee 10

Addressing sensitive issues such as child labour shows to be difficult for many companies (Interviewee 9). Interviewee 10 expressed the importance of spreading awareness among local suppliers. Many local actors do not have the same knowledge and understanding of human rights issues. Interviewee 10 pointed out that local actors do not lack the willingness to comply with CSR standards but that it is instead an issue of distrust.

Interviewee 9 underlined the significance of clear communication and agreements on the standards set by a firm. Gaining a common ground requires initiating a dialogue with one's supplier in order to explain the logic behind these standards and also what one anticipates from them through these standards. Primarily, a company needs to be clear on how they define child labour and why it is essential to their company. On the other hand, interviewee 9 addressed the relevancy of looking through the lens of the supplier. Interviewees 1 and 9 argued if a company wants to reach trust and understanding as a foundation of the relationship with its supplier, openness is key *"there's a cultural lens that you kind of have to think about. You know, when we're asking these questions when we're speaking about them. it will probably not be effective if you call it child labour, or even if you're talking about the test discrimination."*

At the beginning of the interviews, all interviewees were asked how they define child labour. Out of all interviews, interviewee 7 showed a divergent understanding of the notion of child labour. It is worth noting that interviewee 7 is the only Indian participant in this research. When probing the interviewee about his perception of children working in family businesses, the interviewee stated the following *"it is rather difficult to identify child labour in this instance, because these children are not paid and therefore one cannot identify this work as child labour."*

Interviewee 10 disagreed with this statement *"when a child is not paid, then it's forced labour. Then it's just pure exploitation, if the child is working and not getting paid. So no, I would completely disagree."* The literature review emphasises the discussion on the different perspectives of child labour and childhood. Interviewee's 9 stress of understanding the cultural context goes in line with Naidu and Ramaiah's view on the determinants of child labour.

Another recurring factor embedded in cultural beliefs is gender prejudice in Indian society. Interviewee 10 pointed to the perceived role of women in Indian society and the intersection between cultural beliefs and gender inequality. Considering the garment industry is a women dominated industry, the interviewee explained the gender prejudice of future prospects between young boys and girls, *"traditionally, boys were given preference to go to school, because they are the ones that should earn and should get work, etc. And then girls may not be sent to school, so then they are sent to earn money."* This perception of gender roles has also been stressed by Filip et al., arguing that cultural beliefs add to the existing misconception that a young girl's schooling is less significant than a boy's education. The perceived role makes young girls more prevalent to the risk of ending up in the informal sector.

While interviewee 2 partly agreed on considering cultural differences among stakeholders, but he also argued it could lead to the concealment of children's rights abuses, *"Almost all countries have ratified both ILO conventions and are bound by it, apart from small differences in implementation."*

Interviewee 11, the only Turkish participant, was also asked to provide his perception of child labour and described his definition of child labour as similar to the Turkish national regulation.

6.4. India's Caste system

The caste system, which divides all Hindu's in Indian society, continues to play an essential role in the daily life of the people in India. This analytical part will delve deeper into its system by contextualising the system in the garment industry and its role in child labour in India.

The inequality among the different caste is still visible in daily life. Interviewees 1, 2 and 10 all perceived the caste system as a structural driving factor in child labour among the lowest caste. The intersection between child labour and the caste system has also been acknowledged in academic debate. Filip et al. perceive the sociocultural factors such as discrimination and the caste system to pose as a challenge to the traceability of child labour. Chowdhury (2020) mentions the linkage between both as inseparable. Interviewee 2 argued that the caste system not only makes children from the 'untouchable castes' (Dalits) more vulnerable to child labour but also makes it more challenging to tackle the issue. Due to the existing caste ideology and its stigma on the lowest caste, the Dalits are considered by many Hindus to be dirty, inhuman and to not belong to society. This stigma can also be perceived in how Dalits are treated by others, as they are more likely to be exploited and viewed as less worthy. One example interviewee 2 gave concerns the spinning mills in South India.

Ram (2019) confirms the stigmatisation of Dalits in contemporary Indian society, as he describes the structural position of Dalits as spatially isolated. The segregation is visible in their low economic status, lack of political power, lack of education and low social mobilisation. Academic debate has pointed toward the caste system as the root of stigmatisation (Ram, 2019). Ram (2008) highlights the social discrimination Dalits face in the work environment, primarily by their employers. Interviewees 1 and 2 explain that Dalits' opinions and status in the work environment are often perceived as less critical. The social status and lack of opportunities of Dalit families often do not leave other options than sending the children to work. Interviewee 1 specified the taboo and sensitivity around the caste system, explaining the difficulty of addressing the topic.

Further evidence supporting the influence of the caste system on child labour may lie in the findings of Siddharth Kara's study, *Tainted Garments* (2019). In his study, Kara analyses the exploitation of women and girls in the garment industry. One of his most important findings, depicts the origin of the workers. 99.3% of the workers were either of Muslim origin or a highly subordinated caste. Another relevant finding discovered that the hiring agents of migrant garment workers mainly target unmarried women aged 14 to 25, who are either Dalits or from another low caste group. Many of these women and children are employed in forced, bonded, or child labour in the garment industry, which has been categorised as the worst form of child labour by ILO (IDSN, 2019). A similar study conducted by SOMO and ICN (2014) evaluated comparable findings, stating that the majority (60%) of the workers they had interviewed could be categorised as Dalits. The other part of the interviewees was categorised as 'Other backward castes', referring to the caste just ranked above the Dalits.

Interviewee 10 pointed toward another name used to refer to Dalits, "the invisibles". As outcasts, Dalits are less part of the system. Exclusion from socioeconomic structures renders them invisible. *"They are just generally invisible, they are less part of the official system. And so many Dalit children or families, may not have their children registered in official records and then it is easier for them to end up in the workplace, especially informal workplaces."* (interviewee 10). Lack of identification hinders auditors' age verification process and prevents auditors from conducting significant audits. Many young workers do not know their age since they lack proper documents. According to current data, Dalit children are more likely to work in home-based or informal garment jobs. Interviewee 5 indicated that companies are aware but struggle to find a solution. Along similar lines, interviewee 1 agreed with this struggle. Interviewee 1 explained the difficulty of finding a solution at her own NGO, *"We at Arisa, are also a bit searching ourselves, so what can we offer companies to address this theme, because we also realise that if we address it directly, we will not get any further."* On the other hand, interviewee 2 explained *"In fact, Dalits are even more part of the socioeconomic system, but in a very subordinate role because of their birth in a specific caste. One could argue they are more part of this system, because higher caste can more easily escape the caste system e.g. getting a job outside their traditional caste. For Dalits this is much more difficult. "*

Interviewee 7's views rest on the assumption that caste discrimination does not influence the traceability of child labour. Interviewee 5 partly agreed on this statement *"Once you have found that problem of child labour and want to solve it, then the caste system complicates finding and enforcing solutions."* This argument, therefore, circles back to the cultural factor of this thesis. With this, the consensus view seems to be that awareness of the cultural context of the production country is key. In the case of the caste system, the consequences of the system are too far away from the western companies. As the companies are not culturally linked to the production country, it is more difficult to recognise the issue of the system. Therefore, understanding what the system means in the context of their production processes is argued as viable.

6.4.1. The Sumangali Scheme

According to interviewee 5 there are specific areas where the engagement of Dalits is more prevalent in the garment sector. The south of India, particularly the industry's hub in Tamil Nadu, is one of the most prevalent destinations for young girls seeking work. The interviewee pointed toward the Sumangali scheme as the main driver of exploitation in the Southern Indian garment industry. The system is partially rooted in the caste system since it predominantly draws scheduled category women and girls. The Sumangali scheme refers to a system where young women are taught to work in the spinning mills over a period of three years. Companies who apply this system do not pay the girls on a monthly term; instead, they will receive a sum of money upon completion of the contract of three years. This end sum is particularly interesting for the parents of the girl, as it can be used for the dowry. Interviewee 5 criticised this system for several reasons. First, firms who use it exploit it. The girls do not earn a

minimum salary and risk not being paid if they do not complete all three years. Girls who reside in spinning mills are not permitted to leave. Their phones are taken away to prevent them from contacting their family. The work the girls often have to conduct is hazardous practices, even though these forms of work have been categorised as the worst forms of child labour. The girls are presumably under the minimum working age and are often given false promises. Secondly, most parents who send their children to work in the Sumangali scheme often have the best intentions for their children. Hence, interviewee 5 explained, *"This is a very interesting option for parents, because the moment a child no longer has to go to school, at the age of 14, many parents do not want the child at home until they are 18 (...). So then, they can be married off at the age of 18 and the girl is then safe. That's the mindset that those parents have."* Thirdly, the local government has approved the system. The moment a company applies the system, it is not illegal. Though, the way the companies implement the system, is illegal, which makes finding a solution only more complex. SOMO and ICN (2014) also acknowledged the Sumangali as a complex structure to keep young garment workers in a position of bonded labour. The young girls, often from scheduled castes and poorer rural areas, are not only sent away by their parents, but are also recruited by spinning mills. In contemporary literature, the exploitative nature of the structure has resulted in perceiving the system as a form of modern-day slavery (Hiba et al., 2021; Kumar, 2022).

Interviewee 5 explained the difficulty of finding significant solutions to combatting the Sumangali system. He disputed the idea of using audits to detect possible cases of bonded child labour, arguing audits to be inefficient momentary snapshots. Moreover, most companies do not have enough manpower to conduct regular inspections. As the government allows the majority of these systems, it will not create safeguards to ensure that they are implemented legally. Another factor mentioned by interviewee 5 is the work the system generates for the Indian labour market. The employment created through the system is of interest to the government; thus, they are more likely to condone the illegal practices of the Sumangali system.

A more recent article written by Kumar (2022) shows how the Sumangali system still poses as a challenge up to this day, specifically for Dalit families and describes it as *"the carrot being dangled in front of poor and Dalit families in order to secure cheap labour for the textile industries of Tamil Nadu."*

6.5. Refugee flows in Turkey

One recurring topic during the interviews concerning child labour in Turkey is the large flow of refugees. Interviewees 4 and 11 both argued that the refugees are the most vulnerable group in Turkish society to end up in the informal sector.

6.5.1. Registration and assimilation of Syrians in Turkey

Interviewee 4 explained that the major challenge lies in registering the refugees. While more refugees in Turkey have TPS, many remain unregistered. Unregistered Syrians make it hard for the government

to supervise what they do and where they stay. If asylum-seeking children are not recorded in the official system, they will not be missed in school (interviewee 4). As a result, they are more likely to work to support the family. According to Dayıoğlu et al. (2021), progress has been made to increase access to education for refugee children. However, the children who arrive in Turkey at an older age have lower school enrolment rates than younger children. Dayıoğlu et al. argue this to be a result of assimilation issues. Due to war-caused disruptions in education, frequent changes in residential areas, and communication barriers, children who arrive in Turkey at later ages have problems adjusting to the education system. Along similar lines, Dayıoğlu et al. explain that the age of arrival is also a determinant of exposing children to child labour. Another determinant of child labour probability of refugee children concerns a gender aspect. A living father's presence or absence is strongly related to boys' employment, whilst the presence or absence of a living mother is connected with girls' employment.

In some cases, women flee alone with their children to Turkey, often because their husband has passed away in the war (Interviewee 6, CEO at United Work). These women used to be scared to become registered as they were afraid of being sent back to Syria. Interviewee 6 hence explains that they specifically located their offices in Syrian-dominated neighbourhoods in Istanbul in order to spread awareness of the importance of registering.

Interviewee 6 highlighted the progress of reducing the numbers of child labour cases in Turkey and that the flow of Syrians is not something which particularly challenges traceability. The interviewee is part of United Work, a non-profit organization that helps Syrians integrate and become part of the formal employment force in Turkey. United Work contacts companies across various industries to become part of the selection process of companies interested in hiring Syrian refugees. The interviewee explains that companies who are part of this candidate pool are set with a number of criteria, one being child labour (United Work, 2022). Therefore, he explains *"No, we do not see child labour, because if they have child labour they will be less likely to inform us and engage us to help with staff. It is mainly much smaller companies, those larger companies do not dare to use child labour. Bad for the image."* Furthermore, the interviewee noticed that the large majority of the people they are helping to get to work are men. Throughout the entire project, he noticed that this distinction could be explained by the gender roles embedded in Arab culture/customs. Of the entire population they have helped, 11% is accounted as women. Nevertheless, regarding the welfare of the Syrian children, as soon as one of the parents is participating in the labour force, the children can attend school again, *"They then have a life again, they can play again. Now it is the case that if you stop your car because of a traffic jam, four children immediately come at you and then the windows have to open and you get tissues and cookies. These are often Syrian children. (..) it's just so nice to be able to help those children. But that is only possible if the man or the woman is at work and the children have the opportunity to go back to school."*

6.5.2. Syrian children in the garment industry

Interviewee 11 stressed the existence of Syrian child labourers to be existent throughout all tiers of the garment industry. Many work in the agricultural sector of different industries. These refugees are often hired unrecorded, which makes them more vulnerable to exploitation by employers. The complex supply chain of the garment industry only results in the diffusion of refugee children across many stakeholders. These can be tier 1 factories but are more likely informal subcontractors unknown to both the local government and the focal buyer. Turkey exhibits one of the largest informal sector rates amongst OECD nations. Academics view the informal and precarious character of the job market as a suitable field for child labour, including among Syrian refugees, given this context (Fehr and Rijken, 2022). According to interviewees 4 and 6, child labour among Syrian refugees is more prevalent in the South of Turkey, which is the border region between Syria and Turkey. Further evidence supporting this statement may lie in the findings of FLA's 2017 report. The study found Syrian children working in the cotton fields in the South of Turkey. During the cotton season, Syrian families participate in harvesting cotton. Involvement in the extraction of cotton often leads to the involvement of the younger children as well, in order to contribute to the household income. According to interviewee 4, the engagement of Syrian children in agricultural practices goes hand in hand with seasonal work, *"There are, certainly in the east of Turkey, a kind of nomadic families. (...) These nomads move from crops to crops. So when the cotton is picked and the season is over, they move on to the hazelnuts and on and on until yes to get a continuous stream of income."* The nomadic families can either be migrant families from Turkey or refugee families that follow a nomadic trajectory.

The content analysis and reviewed literature showed it is difficult to estimate the number of Syrian children involved in labour. Data retrieved by the Turkish Statistical Institute has been criticised for providing inadequate numbers of child labour in Turkey, one reason being the exclusion of Syrian children within their data (Fehr and Rijken, 2022; Ozgun and Gungordu, 2021). Hence, Fehr and Rijken conducted a study which included Syrian families; when asked whether they were aware of child labour in Turkey, 41% of the 684 participants from Syria said they were. 26% worked within the same household as the respondent and 15% referred to a child working outside the respondents' household.

Another finding by the FLA discovered that many of the Syrian children are younger than 16 years old. The age of 16 is the minimum for children to be engaged in the agricultural sector, according to Turkish legislation. Furthermore, these children often miss out on their education until they are done picking cotton for that day. Unequal treatment of the Syrian refugees can be recognised based on their payment agreements and labour standards. They receive lower wages than their Turkish counterparts, and payments are often arranged by intermediaries, who withhold a part as commission (FLA, 2017). Nevertheless, as this report is from 2017 and there is a lack of recent data, it is unsure whether this is still the case in current cotton production. Though, analysing the study process is relevant to understanding the efficiency of the used measurements.

Now that there is a better understanding of where in the supply chain Syrian children are most likely to be engaged in child labour, three reports have been analysed to examine the used measurements:

- *The FLA 2017* report aimed to study the areas of the cotton supply chain that are most prevalent in child labour in Turkey. In accordance with the comments of the interviewees, the FLA argues it is critical for a firm to disseminate labour standards throughout all tiers of the supply chain. Specifically, in the subcontracted units, it is essential to conduct in-depth research. In these subcontracted units, there are often no monitoring systems, allowing for informal employment of Syrian refugee children.
- **THE MAKING OF A LOST GENERATION: CHILD LABOUR AMONG SYRIAN REFUGEES IN TURKEY** by Dayıoğlu (2021): conducted a study by using a dataset on Syrian refugees in Turkey to assess the prevalence of child labour and the contributing actors. The main findings show a clear gender distinction between Syrian boys and girls. Paid labour shows to be rampant among Syrian boys; 45.1% are between the age of 15 to 17, and 17.4% are between the ages 12 to 14. On the other hand, the participation rate among girls is a lot lower; 8.1% between the ages 15 to 17 and solely 4.7% between the ages 12 to 14. On top of that, only 3% of this group combines labour with education.
- *UNICEF's 2020 report on Syrian refugee children*: In Turkey, UNICEF expanded its campaign to eliminate child labour by increasing government and non-governmental institutions' ability to detect and treat child labour cases and by delivering targeted assistance to at-risk children, teens, and their families. UNICEF's 2018 cooperation with the Izmit Municipality, the "My House" Child Help Centre, provides psychological support to children exposed to child labour and directs them and their families to relevant local resources given by other ministries. UNICEF works with local governments to strengthen their technical capacity to implement effective measures and policy programs (UNICEF, 2018). Most respondents emphasised this multistakeholder function. To profit from multistakeholder efforts, local actors and society must be aware of child labour risks.

Analysing the interviews, academic literature, and NGO reports on Syrian refugee children tells us that the probability of risk of child labour is still apparent among Syrian children. Two observations could be made. Firstly, Many Syrian children and adults work in the informal sector, but precise data are lacking. Registration systems and the difficulty of building sustainable living in Turkey contribute to this issue. Secondly, there is a clear gender difference visible among Syrian boys and girls. Syrian boys are more at risk of ending in child labour, while girls are more likely to end up in child marriage. The two observations combined make us come to a conclusion. The high rates of child labour among Syrian refugees, of which 46% are under 18, and the harsh and hostile circumstances they endure have long-term detrimental effects on their lives. It can cause a generation of children with low human capital. It anticipates a probable failure to integrate host and refugee populations, as well as future societal

tensions, at a time when integration of refugees in Turkey is becoming critical owing to the Syrian civil conflict, which makes their return impossible (Dayıoğlu et al., 2019).

6.6. Conclusion

When I asked the interviewees about the most concerning factor to challenge child labour traceability in relation to either Turkey or India, two factors proved to be dominant topics of discussion; the caste system in India and the large flow of refugees residing in Turkey. The caste system in India has created unequal socioeconomic structures across Hindu society and made the most disadvantaged group vulnerable to exploitation. Understanding the structure of a system such as the caste system demands time and openness. Specifically, when we are looking from a Western lens, addressing sensitive topics requires carefulness. The majority of the interviewees stressed the importance of understanding the different narratives of one's supply chain. The careful approach is also applicable to grasping the existence of child labour in a different culture. In the case of Turkey, Syrian refugees have contributed to the increasing number of child labour. In a similar sense as India, it is crucial to understand the determinants and reasoning behind the existence of child labour. Considering the Syrians are not in their home country makes the process of understanding only more complex. Along with an already rather complex industry, embedded in subcontracting and unregulated garment-producing units, creates a challenge for companies to trace child labour risks throughout their supply chain effectively. Efficient government legislation plays a prominent role in combatting child labour. Therefore, it is vital to consider the loopholes in the law that allow for child labour to continue to exist.

7. Discussion

The following section will discuss the most prominent findings on the role of country-specific factors in relation to child labour. The linkage between the results and the reviewed literature will be examined in order to bring the thesis topic to discussion. Three topics will be addressed: the cultural aspect of conceptualising child labour and the different narratives, TFS in the context of agency theory and child labour as a supply chain risk.

Based on all findings, I found that cultural differences, a lack of trust, and an imbalance of power and responsibility have a significant impact on child labour traceability in India and Turkey. By dividing the recurring patterns in the findings over the themes of inequality and supply chain visibility, I will explain how these have led to the interpretation of the main conclusions.

Cultural differences

During the interviews and analysis of the findings, I found a variation in the conceptualisation of child labour. The disparity has an impact on the supply-buyer relationship as well as the effectiveness of legislation and NGO initiatives. Moreover, cultural differences are embedded in most of the country-specific factors that were analysed. The studied literature demonstrates that scholars are still debating the conceptualisation of child labour. Filip et al., in particular, underline the need to include the cultural views of the producing nation while studying child labour. The findings obtained during data collecting give significant proof of this assertion and tie the statement to traceability, especially in the case of India. The varying definitions showed interesting results in defining child labour. The literature explains the definition's discrepancy due to differing perspectives on childhood and labour. One example which illustrates this discussion is the debate over whether participation in family enterprises is considered child labour. The interviewees contrasted one another, similar to the current debate among scholars. The exclusion of family businesses from the Indian child labour law portrays both the importance of family businesses in Indian society and the position of a child within the context. The interviewees frequently explained the normalisation of child labour as a consequence of tradition and custom. Children are taught the skill of the industry in order to be able to step into the footsteps of their parents' family business. Grooteart and Kanbur's (1995) conceptualisation of childhood perceived through social status reflects this finding in particular. The socialisation process of introducing a child to socio-economic society differs per culture. The interviewees gave several approaches to tackle this disparity. Moving away from one's perception and considering the point of view of one's supplier could create an open relationship. Along similar lines, Khan (2010) touches upon the western development paradigm in the conceptualisation of child labour. The western development paradigm has shaped the internationally acknowledged perception of child labour meanwhile excluding other nation hoods (Khan, 2010). Naidu and Ramaiah argue the role of customs and traditional structures, such as family businesses, as a driver of child labour, which can explain the vision of interviewee 7. Viruru (2008) refers to an intersection between childhood and child labour discourses in Indian contexts. Bilal (2010) delves into the

mechanism of the intersection between both concepts and states the relevance of being able to understand the environment, gender bias and culture in which child labour happens.

The Sumangali system is another finding that confirms the influence of the western lens as embedded in western NGO interventions. While interviewee 5 primarily mentioned the negative impacts of the system, Menon (2019) emphasised the narrative of the Sumangali girls. The civic society bears the moral duty to liberate the victims from the Sumangali scheme's chains. The advocates of liberty and privileges break through the system without comprehending the fundamental requirements that have led to the twenty-first century's proliferation of such a system. The ideology of universalism and the actual implementation of international labour norms to local labour forces are the underlying causes for this contradicting viewpoint, "to safeguard the girls." Therefore, Menon proposes the question, "But is this what the girls desire?". The preceding debate on the consideration of diverse narratives and cultural settings, therefore, circulates back in the use of a system such as the Sumangali scheme.

In the case of Turkey, the findings reveal a less obvious relationship between the preceding debate and the results. The participants in the case of Turkey showed understandings which were more in line with the western notion of child labour. Instead, the challenge of child labour seems to be derived from inefficient government regulation. Not only does this issue apply to the confusion regarding child labour laws, but also the Syrian refugee children. The interviewees particularly touched upon the deficiency of the registration mechanisms for Syrian refugees in Turkey. One advice Aras and Duman stressed is to expand the number of mobile teams which can register and identify unregistered Syrians. State institutions can gain support from International Non-Governmental Organisations (INGOs) to conduct registration sufficiently. Not only is this beneficial for the Syrians in terms of access to legal aid and health care, but it also makes transparency in the supply chain easier for companies. Furthermore, it can decrease the risk of exploitation in the informal sector and the engagement of Syrian children in child labour. Nevertheless, Yaman (2020) touches upon the existing trade-off between child marriage and child labour. Child marriage among Syrian girls in Turkey is quite common and is often preferred over sending a child to work in a textile factory. As a result of poverty, the families are pushed towards this trade-off. To illustrate the severance of the trade-off, Culbertson and Constant (2015) argue that both child marriage and child labour as the *"indicators that survival is taking precedence over education"* (p. 19).

Agency theory

The prevailing ambiguity on who is responsible for managing sustainable traceability across the supply chain has resulted in a debate between the findings and the examined literature. According to the reviewed literature scholars, external stakeholders are typically focused on the buyer's actions in terms of regulating the supply chain. Further discussion focuses on the unequal distribution of buyers' capability and responsibility in the context of SSCM. In contrast, the majority of interviewees feel that the obligation for child labour traceability falls on the buyers, despite literature showing that buyers tend

to transfer accountability to their first-tier supplier. Academics use agency theory to illustrate the unequal power allocation between buyer and supplier by presenting a principal-agent relationship. Nonetheless, the findings underscored the suppliers' existing distrust of their buyers. This mistrust stems from the obligation suppliers face in terms of regulating the supply chain and maintaining transparency. According to the findings, first-tier suppliers frequently lack visibility into upstream operations. There is a difference amongst all stakeholders in their self-interest and behaviour, which reflects the difficulty of control across all actors and also shows an imbalance of accountability/responsibility. According to agency theory, it is the principal's (buyer) responsibility to make sure social compliance is applied throughout the entire production process in order to reach TfS (Garcia-Torres et al., 2019). The underlying assumptions of agency issues by Köksal and Strähle (2021) are reflected in the findings:

1. *Both principal and agent are driven by self-interest, which is visible in their conflicting goals* (Köksal and Strähle, 2021). This assumption is reflected in the relationship between tiers 2, 3 and 4, as outlined in section 5.1. The emphasis of these agents (e.g. ginning mills, spinning mills) lies primarily on the quality and price of the product. The content analysis confirmed that these agents were less concerned about the conditions these employees were engaged in. Contrastingly, the principal aimed to regulate social compliance throughout all tiers. However, because of the short relationships between all agents, there showed a lack of interest in implementing the principal's social standards. In addition, America Today mentioned that in some cases, as a principal one might not have enough leverage to make demands to their agents.
2. *Due to the contradicting goals, agents are tended to hide information demanded by the principal, leading to asymmetrical information* (Köksal and Strähle, 2021). Opportunistic behaviour between both parties leads to a lack of trust in sharing information. Nevertheless, the findings portrayed a different perspective. While in some circumstances, agents will hide child labour out of economic self-interest, others conceal child labour cases due to anxiety and distrust. As mentioned by the interviewees, some of the agents are unable to provide full transparency on the subcontracted processes and thus, cannot ensure that there is no child labour. In order to avoid sharing uncertain data, they might hide the data as they are afraid the buyer will go to a different supplier. Similarly, asymmetrical information can also cause anxiety among the principal. Shukla's et al. concept of chain liability portrays the perspective of third parties within the agency theory (customers, NGOs). The interviewees explained the principal's fear of being transparent towards their customers, as they cannot ensure complete transparency on their entire supply chain.
3. *Risk perceptions differ between principals and agents* (Köksal and Strähle, 2021). This particular assumption relates to the direction the principal and agents take when faced with risks. In the case of child labour, the findings demonstrate that the difference in behaviour can be derived from cultural differences and the narratives of the involved agents, as discussed in

section 6.3. In other words, the values, customs and cultural perceptions shape how an agent/principal perceives a certain risk. Moreover, it also explains that both parties have their priorities set up in a different order.

4. *Uncertain contexts might decrease the control of the involved actors* (Köksal and Strähle, 2021). As argued by Köksal and Strähle, the relevance of examining the context where social compliance is executed, this assumption can be linked to the thesis' research objective. For example, the caste system in India and the Sumangali system make it more difficult for the principal to gain insight into their supply chain. Nevertheless, according to Köksal and Strähle, the principal is tended to shift the responsibility to the agent in these uncertain contexts. Hence, this assumption can be related to the imbalance of agency between all actors but also inadequate knowledge of the context of the production country.

Additionally, the distrust between supplier and buyer, which results from the uneven power distribution, poses a challenge to sufficient supply chain visibility. The literature review points toward the lack of supply chain visibility and transparency in the upstream supply chain as a cause of supply chain interruptions (e.g. child labour)(Kalaïarasan, 2022). Keeping the complex nature of the industry's supply chain in mind emphasises the necessity of sufficient supply chain transparency. All experts participating in the research agreed with the literature, perceiving the lack of transparency as the main reason for the difficulty of tracing child labour.

8. Conclusion

The thesis examined the impact of country-specific factors on the efforts by Dutch brands to trace child labour in Turkey and India. The comparative analysis aimed to recognise patterns that challenge the sustainable traceability of child labour within the garment industry by demonstrating the different perspectives in the child labour field and gaining insight into a company perspective. Agency theory was used to examine how country-specific factors challenge the different roles of buyer and supplier. The thesis aimed to answer the following research question:

What roles do country-specific factors play in relation to Dutch companies' efforts to trace child labour in the Indian and Turkish garment supply chain through themes of inequality and visibility?

All in all, it can be concluded that country-specific factors in both countries challenge child labour traceability efforts. Analysis of the findings showed that all factors discussed above have a confirming impact on the traceability of child labour. While significant progress in the first tier is visible, the findings show that the probability of child labour continues to persist in all tiers of the garment industry. Buyers can maintain a strong relationship with their first-tier supplier, but beyond the second tier, it becomes challenging to maintain control. Therefore, a company's relationship with its supplier is vital in gaining visibility and regulating efficient social compliance throughout the supply chain. In this research, the agency is linked to responsibility, cultural differences and distrust. This point of view ascribes agency to both the buyer and the supplier. Even though the emphasis of the thesis research focused on the company perspective, it is necessary to understand how agency can be applied to the buyer. The findings demonstrated that cultural differences and narratives among supply chain actors shape the perception and behaviour toward child labour. The role of cultural differences specifically became visible in the Indian context. The implementation of the Sumangali system and the different perceptions of childhood and work contradicted the current western lens of conceptualising a child. Shifting away from one's lens is necessary to understand the decision-making of the involved actors in the production process.

Inefficient communication and lack of knowledge regarding the cultural context of the producing country can lead to asymmetrical information and distrust between actors. Agency theory reflected that an unstable relationship between actors could make space for opportunistic behaviour and acting out of self-interest. This behaviour can be derived from the imbalance of responsibility towards the regulation of social compliance (e.g. child labour traceability). The process of subcontracting is often viewed as a form of opportunistic behaviour but might also be perceived as a requirement to meet the demands of the supplier. The multi-tier level nature of the industry's supply chain makes maintaining control over all involved actors challenging. Subcontracting was particularly argued as an issue in Turkey. The minor manufacturing practices are mainly subcontracted to the informal and unorganised units of the industry. Specifically, these unregistered units are more prone to child labour. The lack of government

enforcement in both countries and inefficient government legislation makes space for exploitative working conditions, including for children.

Furthermore, the findings demonstrated the vulnerability and involvement of minority groups in child labour. Hindu society's caste structure presents a challenge to detecting child labour. Even though caste discrimination is illegal in India, Dalits are stigmatised and treated poorly. Systems like the Sumangali scheme draw the lowest castes. Dalit children frequently lack proper identification documents, making age verification and tracking difficult. The sensitivity around the caste system makes it difficult to address. Hence, a lack of knowledge of the system can be circulated back to the cultural differences among supply chain actors. The interviewees differed in their opinion on the role of the caste system in light of the thesis subject. However, they particularly emphasised the struggle to find a solution to diminish child labour probability within the system.

The large influx of Syrian refugees proved to be a factor in increasing child labour risks in Turkey. Inefficient registration mechanisms demonstrated to be one of the main issues to child labour traceability among Syrian children. Some of the Syrians residing in Turkey are still considered asylum seekers. Many of these Syrian families face socioeconomic challenges, such as income inequality and inaccessibility to health or education. With no registration and socioeconomic challenges, many children wind up working in unorganised units. As long as they are not listed in the government system, it becomes hard to track where they live and whether they attend school. Age at arrival is a key factor in whether a child will work. The older the child, the lower the enrolment rate and the higher the possibility of working. In addition, seasonal and temporary labour among Syrian refugee children was prominent. Smaller farms hire families to harvest cotton. Often, the entire family engages in agricultural practices to contribute to the family's income. The data demonstrated uneven treatment between Syrian and Turkish workers.

The role of the discussed factors differs per context. Nevertheless, the extent to which these country-specific factors play a role depends on the cultural differences and narratives of all actors involved in the supply chain. The results do show that all factors contribute to child labour, but the way these issues are addressed and tackled, mainly depends on the relationship between all stakeholders. From the perspectives of both themes, the importance of strong buyer-supplier relationships and understanding of decision-making showed to be crucial.

From the perspective of Dutch fashion brands, it became clear that efforts are made regarding transparency. However, their small role in the entire industry challenges them to make effective changes in the upstream parts of the supply chain. The smaller the brand, the less leverage they have on suppliers to apply social compliance in their production units. Therefore, all participants emphasised trust to be the foundation of a buyer-supplier relationship. Combined with intrinsic motivation and international

legislation, companies can work together through multistakeholder initiatives to change the negative costs of the existing fashion industry.

8.1. Recommendations for future research

There are various manners in which this thesis complements but also recommends future research in light of the thesis objective. Traceability has been used in research on supply chain management for a long time. Sustainable traceability in relation to SSCM has been emerging; however, the focus has been on tracing the process of products in the light of recognising customer health risks. There is currently limited research on sustainable traceability in the social and environmental dimensions. This thesis study is an addition to the current research of TFS in the social dimension by examining the traceability of child labour in the garment industry.

Agency theory in the context of the garment industry's multi-tier supply chains shows a lack of research on the upstream level actors and how these actors are impacted by the social compliance standards set by the buyer (Köksal and Strähle, 2021). Considering the complex nature of the garment industry, it is essential to have adequate research on all actors involved as all are interlinked and impacted by each other's decision-making. Such research is also important as it helps to understand better why specific social compliance processes (e.g. traceability efforts) are showing deficiencies.

The content analysis concerning Turkey showed a lack of quantitative data on the number of Syrian refugee children working in Turkey (Fehr and Rijken, 2022). The majority of the data focused on the share of Turkish children working. With more recent data on the share of working Syrian children, qualitative research can be improved.

9. Recommendations for future child labour traceability

Based on the findings from the study, a couple of recommendations are made to support fashion brands in the future. These recommendations are directed at brands that aim to improve their traceability efforts.

- *Get familiar with the local context:* Understand the cultural background of the nation in which you are producing. Instead of performing audits at random, for example, have a full-time person on the ground. A network of local professional NGOs and unions with whom the employee can consult is essential in this situation.
- *Start a conversation with your supplier(s):* To understand the different narratives and definitions on the issue you would like to address (e.g. child labour), in order to understand each other's decision-making. Also important, in order to avoid misunderstandings and build a long-term relationship based on trust. Examples on how to reach this recommendation: conduct trainings with local employers and your quality assurance employees.
- *Top management should take the lead.* It is important to create awareness and support among all the company's staff (not the local actors), involve your employees beyond the CSR/marketing team.
- *Multistakeholder initiatives:* engage/collaborate with local organizations (e.g. civil society organizations, NGOs and labour unions) and the local government to gain knowledge on the local context and to be able to have inside contacts.

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Appendices

Appendix A: Interview participants details

Interview nr.	Name/Organization	Region focus in relation to thesis	Expertise/function	Date of interview	Received approval for using data
1.	S. Claassen, Arisa Foundation	India	Director at Arisa	15-4-22	Yes
2.	G. Oonk, LIW	India	Former director India Committee of the Netherlands. Currently ambassador at the International Dalit Solidarity Network	15-4-22	Yes
3.	N/A	No specific region	Managing Director	21-4-22 (via email)	No response
4.	N. Jacobs, UNICEF	Turkey	Former partnership developer at UNICEF	22-4-22	Yes
5.	M. Dubbelt, Global March Against Child Labour (GMACL)	India	Senior programme manager	28-4-22	Yes
6.	F. Damen, United Work	Turkey	CEO at United Work NGO	9-5-22	Yes
7.	Anonymous	India	N/A	18-5-22	Yes
8.	M. Geelhoed, MODINT	NL	Senior consultant	19-5-22	Yes
9.	N/A	NL	Senior policy advisor	23-5-22	No response
10.	N/A	India	Senior Advisor at the Danish Institute	30-5-22	No response
11.	N/A	Turkey	Product quality auditor	1-6-22	No response
12.	Spokesperson America Today (not referred to as “interviewee”)	Turkey, India	Sustainability officer	Email correspondence, online meetings	Yes

Appendix B: Documents used for content analysis

Name document	Organization/source
Child labor in cotton supply chains	Fair Labour Association (8 th of June 2017)
Uncovering Hidden Supply Chains: Strategies to Close the Gap Between Child Labour and Forced Labour Legislation and Implementation	GoodWeave (n.d.)
The Hidden Workforce: A study on Child Labour in the Garment Industry in Delhi	Save the Children (2015)
Child Labour: GLOBAL ESTIMATES 2020, TRENDS AND THE ROAD FORWARD	UNICEF & ILO (2020)
2018 Findings on the Worst Forms of Child Labor: Turkey	Bureau of International Labor Affairs (2018)
NATIONAL LEGISLATION ON HAZARDOUS CHILD LABOUR :Turkey	ILO (2014)
2020 Findings on the Worst Forms of Child Labor: India	Bureau of International Labor Affairs (2020)
Ending child labour by 2025: A review of policies and programmes	ILO (2018), Alliance 8.7
Final Evaluation of the Dutch Agreement on Sustainable Garments and Textiles	Royal Tropical Institute (KIT)(2022)
Flawed Fabrics: The abuse of girls and women workers in the South Indian textile industry.	SOMO and ICN (2014)

Appendix C: Code book

Code name	Type of code	Definition in context of thesis subject
Audits	Inductive	Supplier assessment at manufacturing facility
Awareness	Inductive	The state of being aware that something occurs
Caste system	Inductive	System which classifies Hindu society in four different castes
Child labour	Deductive	“child labour can be defined as the work that deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development.” (ILO, n.d.)
Child labour act	Inductive	Law to tackle child labour
Collaboration/multistakeholder	Deductive	Collaboration among different level actors (NGOs, companies, government, unions).
Companies	Deductive	Refers to fashion brands in this context (the buyers)
AGT (covenant)	Inductive	Dutch Agreement on Sustainable Garment and Textiles
CSR	Deductive	Corporate social responsibility

Culture	Inductive	Encompasses the beliefs, customs, behaviours, values and symbols, as a way of life to a group of people.
Documented	Inductive	People who are registered in the country where they reside
Due diligence	Inductive	In line with UN and OECD guidelines on responsible business conduct. These guidelines require businesses to check to what extent they are involved in misconduct and whether they actively act on it (IMVO, n.d.)
Educating employees	Inductive	Spreading awareness on child labour and how to effectively combat risks
Education	Deductive	Primary and secondary education
Family	Inductive	All people directly related to someone
Family business	Inductive	Family businesses are argued to form a complex system between business, ownership and family, and can vary per culture (Kalé et al., 2020)
Fast fashion	Deductive	“A business model based on offering consumers frequent novelty in the form of low-priced, trend led products” (Niinimäki et al., 2020)
Garment industry	Deductive	Industry producing garments
Gender inequality	Inductive	Inequality between men and women
Government	Deductive	“The political system by which a country or community is administered and regulated.” (Brogan, n.d.)
Inequality	Deductive	The unequal distribution of opportunities or/and resources
Informal labour	Inductive	Unregistered labour
Labour standards	Inductive	Working standards according to government regulations
Legislation	Inductive	The implementation of regulation and laws by the government
Local organisations	Inductive	Unions and organisations on the local level
NGOs	Deductive	Non-profit organisations
Poverty	Deductive	Income level below sustainable living wage
Refugees	Inductive	A refugee is a person who has been forced to leave their country due to persecution, hostilities, or other forms of violence.
Religion	Inductive	Worship of a supernatural controlling power, notably God or gods.
Stakeholders	Deductive	Actors involved in a supply chain
Stigmatization	Inductive	the act of considering an individual or something as deserving of shame or extreme contempt.
Subcontracting	Inductive	Outsourcing of parts of a supply chain
Supplier buyer relationship	Inductive	The relationship between supplier and buyer
Supply chain	Deductive	All production processes combined

Sustainability	Deductive	Maintaining our needs without jeopardizing future generations' needs.
Tier 1	Inductive	Ready-Made garments
Tier 2	Inductive	Spinning mills
Tier 3	Inductive	Ginning mills
Tier 4	Inductive	Extraction of cotton
Traceability	Deductive	A firm's ability to determine origin of the product
Transparency	Deductive	To have insight into all stakeholders and operations in the upstream parts of the supply chain and disclose this information to the public
Undocumented	Inductive	People who are not registered in the country where they reside
Urban rural migration	Inductive	Migration between city and the country-side
Visibility	Deductive	Concerns the process of gathering information, both upstream and downstream of the companies' supply chain
Vulnerability	Inductive	The characteristic or situation of being susceptible to the prospect of assault or damage, either physically or psychologically.

Appendix D

Interview guide – Child labour experts conducted in Dutch

Introductie

1. Heb ik uw toestemming om dit interview op te nemen?

Mijn naam is Isa, uw interviewer van vandaag. Ik ben bezig met mijn onderzoeksscriptie m.b.t. kinderarbeid in de fast fashion industrie. Ik schrijf mijn scriptie voor de master International Development studies aan de Universiteit Utrecht. Het doel van dit onderzoek is om meer te kunnen begrijpen van kinderarbeid in de kledingindustrie en de problemen die naar voren komen bij het monitoren van risico's van potentieel kinderarbeid in supply chains. De vragen die ik u zal stellen hebben daarom ook te maken met dit specifieke onderwerp. De data van dit onderzoek wordt alleen gebruikt binnen deze scriptie en wordt vertrouwelijk behandeld indien gewenst.

2. Heeft u nog vragen of opmerkingen voordat we beginnen?

Openingsvragen:

3. U werkt voor (organisatie), wat is uw functie?
4. Hoelang werkt u al bij (organisatie) en hoe bent u in dit specifieke veld terecht gekomen?
5. Bent u gespecialiseerd in één specifieke regio/land? Zoja, welke en waarom?

Vragen m.b.t. kinderarbeid:

6. Wat verstaat u onder kinderarbeid?

In welke vormen? (seksuele uitbuiting, trafficking)

7. In welk land is kinderarbeid momenteel het meest voorkomend uit uw ervaring en kennis?
8. Wat zijn veel voorkomende problemen waar bedrijven en organisaties tegenaan lopen, wanneer ze kinderarbeid proberen te traceren?
9. Wat zijn belangrijke factoren om in het achterhoofd te houden wanneer een bedrijf probeert kinderarbeid te traceren door hun supply chain heen?
10. Zijn jullie verschillen tegen gekomen tussen verscheidene productie sectoren m.b.t. het monitoren van kinderarbeid?
11. Welke CSR maatregelen zijn efficiënt gebleken om kinderarbeid te verminderen?
- 11.a. Zijn er landelijke karaktereigenschappen in de landen die u heeft onderzocht, die specifiek gezien meer invloed hebben op het bestaan van kinderarbeid?

fashion industrie in relatie met kinderarbeid;

12. In hoeverre speelt Nederland een rol in de fast fashion industry?
13. Hoe doen nederlandse merken m.b.t. het verduurzamen van de supply chain?
14. In welke deel (tier) van de supply chain is het risico op kinderarbeid, volgens u, het grootst?
15. Wat zijn de initiatieven die (organisatie) tot nu toe heeft genomen om kinderarbeid aan te pakken en in hoeverre zijn deze efficiënt geweest?
16. Wat hebben de due diligence standards toegevoegd het verduurzamen van de kleding industrie en verminderen van kinderarbeid?

India

17. Wat voor acties worden er momenteel ondernomen door (organisatie) in India m.b.t. kinderarbeid?
18. Wat zijn problemen die specifiek in India naar voren komen bij het monitoren van kinderarbeid?
19. Welke landelijke factoren (armoede, onderwijs) beïnvloeden de hoogte van cases van kinderarbeid voornamelijk, in India?
20. Hoe is over algemeen de relatie tussen de private sector en lokale leveranciers in India?

Sluitende vragen

Hoe ziet u de aanpak van kinderarbeid in de toekomst voor u?