

**SPECIAL ISSUE ARTICLE**

# Child brides or child labor in a worst form?

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In this article, we argue that the early and/or forced marriage of girls under 18 should be understood, in part, as an exploitive form of child labor. We describe the types and conditions of labor that are commonly experienced by child brides and we examine the strengths and weaknesses of current international laws to adequately address the issue. We also argue that the problem of child brides should be addressed by the International Labour Organization (ILO) as one of the worst forms of child labor. Finally, we suggest the ILO Convention No. 182 (known as the Worst Forms of Child Labour Convention) as a legal mechanism. The convention offers one possible way to help to raise awareness in families and across societies about the harms of child marriage and provide for criminal and civil sanctions as tools to combat it.

## 1 | INTRODUCTION

The early and/or forced marriage of girls under 18 is one of many types of child exploitation seen in the world today. As part of “child marriage,” which refers to any legal or customary union in which at least one spouse is under 18 years of age, child brides are subject to a variety of harms (International Center for Research on Women, 2015).<sup>1</sup> Scholars from human rights, health, legal, and social science perspectives have devoted increasing attention to the sexual, psychological, and physical abuse; loss of education; and adverse health outcomes that child brides experience. They have also, for the most part, pointed to culturally specific patriarchal beliefs and marriage customs as the main reasons for the early marriages of girls in different societies.

By conceptualizing child marriage in this way, however, scholars have overlooked one very important aspect: child brides are subject to the worst forms of child labor. Child brides are often expected to perform household, agricultural, and/or other types of work within and for families, including around-the-clock caregiving for disabled, elderly, or other members of a household (Becker, 2017). Yet because of gendered notions about work and rigid ideas about what counts as formal, informal, and domestic labor, these activities have been seen as the “natural responsibilities” of the girls. The unpaid work done by child brides is thus overlooked or accepted rather than being seen as one of the

dimensions that gives harm to the well-being of girls. Marriage, as a family issue, veils the reality of unpaid labor performed by child brides, and scholars, who routinely criticize exploitive child labor outside families, fail to acknowledge the unpaid labor that is performed by girls within them.

In this article, we pose the question of whether the early marriage of girls can be interpreted under the coverage of the International Labour Organization (ILO) *Convention Concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour* (known also as ILO C182, the *Worst Forms of Child Labour Convention*) (International Labour Organization, 1999). It is significant because typical conceptualizations of child marriage as an issue of cultural tradition have led to efforts to change attitudes and marriage customs and this can be an exceedingly slow and difficult thing to do (Cloward, 2016).<sup>2</sup> In Turkey, for example, where child brides have been subject to ongoing debate by academics and in the Parliament, children under 18 are legally protected by national laws that prohibit forced marriage, and that require spouses to be at least 17 years old (16-year-olds are allowed to marry only with a court decision in specific circumstances). Yet child brides can be seen especially in the eastern part of Turkey, and Syrian girls are also commonly married under 18 (Kivilcim, 2016).

Our aim, instead, is to argue for a conceptualization of child marriage as a labor issue and to place it within the framework of ILO C182. We review the literature on child brides and the labor aspects of child marriage, drawing particular attention to the case of Turkey. We then discuss current legal responses, including relevant international laws pertaining to slavery and human trafficking, and call for the application of ILO C182 as a mechanism for combating the problem.

The problem of child marriage is found worldwide, and it is important for the international community to play a role in the struggle against it (Gaffney-Rhys, 2011). We hope that our article will contribute to a more well-rounded understanding of the problem of child brides; help to advocate for taking child brides into programs against the worst forms of child labor within countries; and further discuss internationally about including child brides under the scope of ILO C182. Doing so will help raise awareness across countries and place governments under the microscope when they allow the continued exploitation of girls in child marriage. Ultimately, the practice of families giving or selling girls as unpaid hard workers to another family under the name of “marriage” needs to be recognized before it can be challenged.

## 2 | BACKGROUND ON CHILD MARRIAGE

Child marriage occurs all over the world, though it is especially prevalent in countries of the Global South. Estimates suggest that up to half the girls who live in developing countries will be married by their 20th birthday (Warner, 2011, p. 238). The highest percentages are found in sub-Saharan Africa and the highest numbers in South Asia: India accounts for nearly as many child brides as all other countries put together (Becker, 2017, p. 48). A recent report from the ILO based on interviews with people aged 15 and older suggests that there were over 5 million children in situations of forced marriage in the world in the year 2016. The overwhelming majority of these children were girls, and approximately 40% of them were married at 14 years of age or younger (International Labour Office, Walk Free Foundation, & International Office for Migration, 2017).

Exact data on child marriage is hard to obtain because public records are not available in many countries where it occurs. Countries may not have birth records, especially in rural areas, and they may not have marriage records because the marriages are solemnized by local religious or tribal leaders and not registered with government officials (Warner, 2011, p. 237). For these reasons, trends in child marriage are hard to ascertain, though it is thought that the incidences have become

somewhat less common in some countries, such as Turkey and Tanzania, in recent decades.<sup>3</sup> Despite that, the practice does continue globally (Cloward, 2016, p. 39).

Many factors are associated with child marriage, including poverty, religion, and low education of fathers and husbands, all of which help continue the practice (Turner, 2013, pp. 40–41; Yüksel-Kaptanolu & Ergocmen, 2014). In Turkey, girls who are married early have been more likely to come from extended traditional families in rural areas with fathers who have low educational levels (Ertem, Saka, Ceylan, Deger, & Çiftçi, 2008; Yüksel-Kaptanolu & Ergocmen, 2014). Countries with low levels of economic development are more likely to have the practice, and religion and traditional gender roles also contribute to child marriage (Bunting, 2016; Mathur, Greene, & Malhotra, 2003).<sup>4</sup> Although rural areas are often identified as having high proportions of child marriage, in some countries, such as Iran, there are also substantial numbers in urban areas (Tremayne, 2006, p. 75).

Vulnerable groups, such as refugees, may also be involved. For example, in Turkey, Kivilcim (2016) noted the increase in child marriage involving Syrian refugees and Turkish men.<sup>5</sup> Although less common, conflict settings can make girls vulnerable as well; they can be abducted for marriage or handed over to militias and warlords (Turner, 2013). Child labor outside of the family can also be associated with child marriage, as in Tanzania. There, girls exploited as domestic servants or in small-scale gold-mining areas have been vulnerable to child marriage (Human Rights Watch, 2014, p. 39).

Gender inequality is also a factor in child marriage as both a cause and effect (Gok, 2016). For example, when women's labor force participation in Turkey goes up, child marriage goes down (Yüksel-Kaptanolu & Ergocmen, 2014, p. 1710). In terms of effects, girls are more likely to be married early compared to boys, and they are more likely to be married to someone substantially older compared to boys.

The harms of child marriage are also gendered, and scholars and activists rightfully highlight the sexual exploitation that occurs in child marriage (see, for example, Ouattara, Sen, & Thomson, 1998). They also note early childbearing and health consequences, such as increased risks of obstetric fistulas, maternal mortality, and cervical cancer that occur for girls (Mathur et al., 2003; Nour, 2009). Girl brides face higher rates of sexually transmitted diseases, including HIV, and domestic violence as well (Bokhari, 2009; Yount et al., 2016; Zaman, 2013).

In addition to physical and psychological harms, there are also negative consequences for girls in terms of education and employment. Girls who are married early are often expected to leave school if they are attending one, which can impact reading, writing, and mathematical and financial literacy, and limit their ability to have a voice in family decision making (Parsons et al., 2015). Removing girls from schools also isolates them within families, thus removing potential networks of social support. Furthermore, without education, girls are relegated to future paid work that is low waged and unskilled (International Center for Research on Women, 2015).

The reasons vary, but families continue to choose child marriage due to the lack of resources that prevent them from being able to support all members of their families; concerns about affording a dowry (which can increase with a girl's age), worry that they will not be able to prevent girls against sexual assault or abuses in their communities; or a concern about family honor should the girls engage in sexual activity outside of marriage (Becker, 2017; Cloward, 2016). Very poor families may give a girl as a bride to another family so that she will not go hungry or so that they may be given a bride price in return. Families may also exchange daughters in order to cancel debt or settle family disputes (International Labour Office, Walk Free Foundation & International Organization for Migration, 2017). In one study in southeastern Anatolia, for example, the reasons given by parents and guardians for early marriage for girls included poverty, lack of education, relations with relatives, and patriarchal gender norms among others (Erkan, Yıldız, & Avcı, 2015).

### 3 | LABOR ASPECTS OF CHILD MARRIAGE

In addition to the harms noted above, young girls can be harmed by the work that they perform in the households into which they are married. They are commonly expected to work within the family, providing caregiving for children, in-laws, and/or other family members. Bokhari (2009) provided examples of this in a report on child marriage in the United Kingdom: a 16-year-old girl was brought from Bangladesh to marry an 18-year-old boy in order to care for the husband's four other siblings; other girls were brought to care for adult men with learning disabilities (Bokhari, 2009, pp. 25–26).

In addition to caregiving, girls may also be expected to complete household tasks for the family and because many of the girls are in rural areas in countries with developing economies, such tasks may include labor-intensive and even dangerous activities. They may have to fetch clean water, clean, cook, tend cattle or other animals, farm cash crops, or make traditional food, drink, or other items for sale or for the family's consumption. Girls who marry early are often expected to enter into a relationship of servitude with their new husband and family, and this can even lead to bonded labor, enslavement, or commercial sexual exploitation (International Center for Research on Women, 2015, p. 13). Some are put to work outside the household in the informal sector, or they may be expected to take part in home-based paid work as well as domestic labor in the household (Mathur et al., 2003, p. 10). In such cases, the earnings they make go to the husband or family, and they are still expected to perform unpaid domestic labor in the household.

Researchers working on issues of child labor have often studied child domestic workers as a general population (Bourdillon, 2009). Children in many countries are sent to work in the home of a third party (i.e., strangers, friends, or distant family members), and they complete a wide array of tasks and services ostensibly for pay. The ILO and others have highlighted the vulnerabilities of child domestic workers and the risks they routinely face: long and tiring workdays; exposure to toxic chemicals; carrying heavy loads; using dangerous tools such as knives, axes, and hot pans; inadequate rest, food, or accommodations; and the possibility of physical, verbal, and sexual violence (Blagbrough & Glynn, 1999).<sup>6</sup> Researchers who examined data from six countries so that they could ascertain whether domestic work could be accepted as a worst form of child labor due to its psychosocial effects found that children in India and Togo were the most at risk (Gamlin, Camacho, Ong, & Hesketh, 2015). Research has also shown that many of the children are unpaid, for example, 65% of them in Togo and 94% of them in Costa Rica (Gamlin et al., 2015, p. 218). While recognizing the variation in the conditions of work for child domestic workers around the world, most scholars agree that they need adequate protection from abusive working conditions, and that in some cases, child domestic work is a worst form of child labor.

Child brides performing the same work should be afforded similar protections, but they are not because the work they do is hidden in the family. That is why lifting the veil of marriage from any kind of exploitation of children is so important (Şişli, 2014, p. 141). We need first to clarify the reality of the marriages: it is a form of slavery and sexual exploitation when the child is made to work outside and/or inside of the family, performing sexual and/or domestic labor, caring for disabled, elderly, or other family members, and with little ability to refuse or to leave her situation. The clarification is necessary if we are to understand these girls as experiencing the worst forms of labor.

This requires a shift of thinking among legal scholars, social scientists, and others. In Turkey, most of the research about child brides examines the subject from its socioeconomic and cultural aspects, and highlights the health impacts of child marriage (Burcu, Yıldırım, Sema, & Sanıyaman, 2015; Durdu & Yelboga, 2016; Özcebe & Biçer, 2013). The labor dimension is not often considered; and when it is, it is not emphasized as a worst form of labor. For example, in one report that described child brides as exploited because of their responsibility for housework in crowded families

and that acknowledged the alienation that the girls feel as they try to adapt to their new lives, the authors did not connect their findings to ILO C182 or slavery (Erkan et al., 2015, p. 118). In another study, the issue was framed as child abuse and exploitation (Yüksel & Yüksel, 2014).

## 4 | LEGAL AND CIVIL SOCIETY RESPONSES TO CHILD MARRIAGES

Both national and international regulations have been put into place to try to prevent and address child marriage and national laws have been strengthening throughout the world (Arthur et al., 2017; Singh & Kapur, 2001). Most countries have now established 18 years as the legal age for marriage, though it is also true that the majority of countries ( $n = 146$ ) have exceptions that allow girls to marry at younger ages with the consent of their parents or authorities. Additionally, many countries maintain religious exemptions (Arthur et al., 2017; Becker, 2017, p. 51).<sup>7</sup> Scholars and activists in such countries have thus highlighted the role of judges in addressing child marriage. For example, in Turkey, they have suggested that judges should try to be sensitive to family situations and provide social aid instead of giving permission to marry (Özkan, 2013).

Scholars have cited two concerns about the usefulness of minimum age laws to address child marriage. The first is that it is not just child marriage per se but also the poverty and inequality that girls face that is harmful, so laws focusing on the minimum age of marriage are not targeting the main problem (Bunting, 2016). The second is that the laws can have unintended effects (Suarez, 2017). The minimum age of marriage component of the Nigerian Child Rights Act, for example, had the reverse effect of solidifying a community's defense of child marriage for religious or cultural reasons (Toyo, 2006). We share these concerns, but we underscore that laws can be developed and implemented in ways that are helpful: in Sub-Saharan Africa, national laws on the minimum age of marriage have been successful in reducing the prevalence of child marriage across countries in the region (Maswikwa, Richter, Kaufman, & Nandi, 2015).

In some countries, minimum age laws have been supplemented with laws criminalizing forced marriage specifically. The United Kingdom, for example, has the *Anti-social Behaviour, Crime and Policing Act of 2014*, which not only makes it a criminal offense to force someone to marry but also includes taking someone overseas to do so.<sup>8</sup> We stress that child marriages cannot be avoided by punishment because family customs and marriage traditions are intertwined with broader social, cultural, and economic conditions that can create barriers to social change in particular communities. (Becker, 2017; Cloward, 2016; Erkan et al., 2015). Furthermore, as suggested by Sabbe, Temmerman, Brems, and Leye (2014) in their critique of the legal approach to forced marriage in the United Kingdom, laws that take a criminalization approach can be used to target immigrant groups and result in driving the issue underground.

We view the development and implementation of law as one component of a broader effort to address the problem of child brides, working in conjunction with a variety of local, national, and international strategies and civil society groups to help create social change (Gaffney-Rhys, 2011). Civil society organizations work locally and globally to advocate for new and better laws pertaining to child marriage and for their enforcement. They also attempt to change attitudes and social practices in communities and among governmental officials; empower girls with information, skills, and support networks; educate parents and community members about the harms of child marriage; enhance girls access to a high-quality education; and provide economic support and incentives to girls and their families (International Center for Research on Women [ICRW] & Girls not Brides, 2016; Mathur et al., 2003; Shawki, 2015). They are also increasingly drawing attention to the labor dimensions of child marriage for girls. One of the mottos used by Flying Broom, a NGO based in Ankara

that works on women's issues, was "child marriage is child labour." They sought to raise awareness on May 1, International Workers' Day, that child marriage is not only a patriarchal, economic, or cultural problem, but also has labor dimensions.

## 5 | INTERNATIONAL LAW

The United Nations is important in combating child marriage, helping to develop an international legal framework to address the problem of child brides (Kawewe & Dibie, 1999). As argued by legal scholars Mwambene and Mawodza (2017, p. 33), this framework stresses children's rights and provides guidance for individual countries. Sociologists, too, have pointed out the power of international law. Kim, Longhofer, Heger Boyle, and Nyseth Brehm (2013) showed that a standard minimum age of 18 in international law has been influential in helping to combat the effects of child marriage. They show that adolescent fertility rates drop when countries adopt national laws that follow this international standard without exemptions. All of these scholars point to the power of international law in helping to foster global norms about child marriage that can influence state policies and practices as well as attitudes at local community levels (Cloward, 2016; Shawki, 2015).

A number of international conventions are relevant to early and/or forced marriage, as well as the slavery of children used in any manner. While each one has aspects that may be useful for the issue of child brides, however, they all have drawbacks as well.

- *The 1926 Slavery Convention* asks states to abolish any practice by which women are promised or given in marriage on payment of a consideration in money or in kind to her parents, guardian, family, or any other person or group. However, it does not address children specifically (Warner, 2011).
- *The 1962 Convention on Consent to Marriage, Minimum Age for Marriage, and the Registration of Marriage* calls for minimum ages of marriage for both girls and boys, but does not specify what the age should be (Becker, 2017, p. 48; Warner, 2011).
- *CEDAW* confirms the right to enter marriage only with free and full consent and that child marriage shall have no legal effect, and it suggests a minimum age of 18 (Becker, 2017).
- *The Convention on the Rights of the Child* specifies that children are people under 18 but then undermines that by allowing for local variation in the definition of childhood and by reaffirming parents' rights (Warner, 2011).
- *The Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, Supplementing the United Nations Convention against Organized Crime* uses 18 as the age of adulthood and states that people under this age cannot consent to their exploitation.<sup>9</sup> The Protocol defines trafficking as recruiting, transferring, harboring, or receipt of a child for exploitation. If a child under 18 is moved from one location to another for the purpose of exploitation, they are considered to be trafficked whether they have been taken across borders or simply moved to another household within the same village (Turner, 2013, p. 26). The Protocol asks that states criminalize trafficking and also obliges them to provide assistance and protection for individuals who have been trafficked for whatever purpose, including forced marriage.

Human trafficking and child marriage can thus overlap: child trafficking can end up in forced marriage and forced marriage can lead to sex or labor trafficking (Bokhari, 2009). The experiences of child brides can mirror the experiences of those in human trafficking: in both cases, children may be unable to consent. In both cases, economic transactions may be involved and the girls can lead a life



of bondage or be controlled by others. In both cases, the girls may experience violence and abuse (Warria, 2017).

For these reasons, some scholars believe the Protocol would be useful in addressing the issue of child brides (see, for example, Warner, 2011, pp. 261–266). It has, after all, been widely and rapidly adopted by states and has no religious or cultural exemptions; there are no loopholes by which a trafficker is exonerated by marrying the victim. If the marriage can be considered a form of exploitation, then states have to develop programs to prevent it and develop rehabilitation programs to assist victims as well.

Yet there is one major concern about the Protocol, which was foreshadowed in our earlier discussion of legal responses: the heavy focus on criminalization. Though the Protocol does encourage states to ensure victim protection, the emphasis is really on state cooperation to address trafficking as transnational crime (Shelley, 2007). The Protocol assumes that traffickers are criminals, often tied to organized crime groups that operate across borders, when the reality is that traffickers are often family members or friends and sometimes even a formerly trafficked person themselves, mainly coming from countries in the Global South (see, for example, Siegel & de Blank, 2010). It is not surprising, then, to find that states are not only criminalizing trafficking, but relying in large measure on law enforcement agencies for implementation, and that they can be more concerned with securing borders than with the protection and rehabilitation of trafficked persons (Berman, 2003).

Using the Protocol to address child marriage would criminalize families that practice it. We have already noted that such families are disproportionately likely to be poor, uneducated, or otherwise socially marginalized, leaving the likelihood that a criminalization approach, without accompanying efforts toward social and economic development and adequate protection and support for child brides, will leave them even more vulnerable. Moreover, though the Protocol covers both labor and sexual exploitation, most countries have focused mainly on the latter, taking measures against sex trafficking but doing less to address labor trafficking (See, for example, Limoncelli, 2016, pp. 10–11). Because the usefulness of the Protocol for addressing labor exploitation has yet to be shown, we hesitate to advocate for its application to the issue of labor in the context of child marriage.

## 6 | THE ILO CONVENTION

Due to the important labor dimensions of child marriage and the gaps in existing international law outlined above, we advocate for the application of ILO C182 to address the problem of child brides. The convention defines the worst forms of child labor as including all types of slavery, trafficking of children, and any other type of forced labor. It includes any work that could damage the health, safety, or well-being of children and any activities that sexually exploit children (International Labour Organization, 1999).

When girls are in child marriages and compelled to undertake work or service under the menace of any penalty or for which they have not offered themselves voluntarily, they are in conditions of forced labor under *ILO Convention 29* on Forced Labor (Anti-Slavery International, 2015). Forced labor applies to child marriage “whenever it can be established that a child has been exploited by being forced to engage in sexual relations, undertake domestic duties in the home or work outside the home, for the benefit of the spouse or the spouse's family, if they have not voluntarily offered to do so and are unable to refuse or to leave the marriage” (Turner, 2013, p. 29).

Girls in such situations qualify as being involved in the worst forms of child labor and therefore fall under the ILO's purview. States are obligated to take action to eliminate the practice, including the creation of special programs of action, identifying and helping children who are at risk,

removing children from the situation, and providing protection and support for their reintegration into society; increased efforts toward prevention; and increased opportunities for children to get an education. The convention also asks that states give special consideration to the vulnerable position of girls.<sup>10</sup>

The ILO Convention captures the forced labor and labor exploitation that can occur in child marriage but is overlooked in the other conventions. Child marriages can be interpreted from different points of view using other conventions, for example, as a gender issue or violation of children's human rights or a crime, but when the child bride is being exploited for paid, unpaid domestic, and/or sexual labor by the family into which she was married, then ILO C182 would fit the situation.

## 7 | CONCLUSION

Child labor is defined by ILO as “*work that deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development*” (International Labour Organization, 2017). The goal is to try to keep children out of work by establishing a minimum age limit and by compelling governments to apply social policies for promoting education and preventing poverty. Yet child labor persists all over the world, not only in poor regions but also in wealthier ones, and it remains tied to the informal sector (Docquier, Müller, & Naval, 2014; International Labour Office, 2017). That is why child labor is still an issue that tops the ILO agenda.

Employing children, with low wages and in hard work, can only be possible out of the reach of state control in underground labor markets. Because distribution of incomes is unequal between countries, and also between populations within countries, increasing inequality and decreasing social protections exacerbates child labor and leaves more children in vulnerable and insecure circumstances. Attempting to establish a clear international consensus to protect children against the worst forms of child labor, the ILO developed Convention No. 182 in 1999 (Dennis, 1999).

The ILO defines three categories of children: full-time workers, children who combine work and education, and children who are neither at school nor at work. The last group is called the “nowhere child” and it includes those who are engaged with domestic work within the family. Unfortunately, the ILO has been slow to realize the applicability of its own convention for the child brides that fall into this last category or to recognize the work that they do as child labor.<sup>11</sup> The organization has considered domestic labor done in a third-party household as work, whether or not it is paid, but if that same work is done in one's “own” household, it is not considered work. This has led to an undercounting of girls in child labor statistics and it overlooks the entire population of child brides and the work that they do.

This may be changing, as the ILO finally included estimates of forced marriage in its 2017 *Global Estimates of Modern Slavery* report (International Labour Office, Walk Free Foundation, & International Organization for Migration, 2017). It is a step in the right direction of acknowledging the unpaid domestic work and the labor exploitation of child brides and ensuring that the work that girls do in and for families is not overlooked or excused as “light work” that does not compromise their physical or moral development and is therefore permissible under ILO C182 (Bhukuth, 2008). Ignoring these girls and failing to understand their labor as economic activity not only gives us a skewed understanding of work, it also ignores that such children are denied their rights to an education (Bhukuth, 2008, p. 386). While there is increasing recognition that child domestic work can be a worst form of child labor occurring in the informal economy, there is still little discussion about child brides in this context.

Child labor and child marriage are not simply parallel problems separately affecting girls; they overlap. Scholars have debated the causes and effects of child marriage but not the use of child brides



for paid and unpaid domestic work and/or sexual labor. These types of labor remain veiled by naming them as marriage, but they are a type of slavery in which child bride is exposed to physical, psychological, and/or sexual abuse. If there is forced labor of children by the way of so called “marriage,” ILO Convention No. 182 should be applied.

Marriage, as a family issue, veils the reality of labor performed by the child bride. Because all kinds of slavery and similar practices, besides sale and trafficking of children, and abuse of them sexually, physically, and psychologically in work, are accepted as worst forms of child labor according to the third article of ILO Convention No. 182, the majority of the child marriages can be put under the provisions of convention. Calling them a worst form of child labor will help to raise awareness in families and societies and prevent these types of marriages, in addition to providing criminal and civil sanctions in countries.

The ILO has set targets to eliminate the worst forms of child labor with an international program and in 2013 set standards for decent work for domestic workers though ILO Convention No. 189, yet the work done by children at home is a violation of that convention in many specific conditions. Calling attention to child brides as one of the worst forms of child labor may yet find a place in this program of the ILO and thus garner additional support for stopping the practice of placing girls in child marriages.

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## ENDNOTES

<sup>1</sup>Child marriage overlaps with but is not the same as “forced marriage” in which one or both spouses of any age do not give free and full consent to the marriage or are unable to leave the marriage. However, given that children are not able to give consent, most child marriages are also considered forced marriage (International Center for Research on Women, 2015).

<sup>2</sup>It can also have unintended effects. Suarez (2017) found that raising the minimum age of marriage in India increased problems of female infanticide and sex-selective abortion.

<sup>3</sup>Yüksel-Kaptanolu and Ergocmen (2014) find that child marriage has gone down in Turkey since the late 1970s. Human Rights Watch (2014, p. 34) noted that it has gone down 10% in Tanzania since 2004 but the numbers remain high.

<sup>4</sup>For example, a recent study of 388 undergraduate students in Ankara, Turkey found that those with sexist attitudes were more likely to support child marriage (Kaynak Malatyali, Kaynak, & Hasta, 2017).

<sup>5</sup>The author also notes the labor exploitation of Syrian women and children in formal and informal work in Turkey, but does not connect the two issues to recognize the child labor performed by girls in child marriage.

<sup>6</sup>See also the ILO's website: (2017) on child labor and domestic work.

<sup>7</sup>In the United States, which has no national minimum age for marriage, the states determine marriageable age. As of 2018, at least 20 states had no absolute minimum age due to parental or judicial consent exemptions (Harmon & Blinder, 2018).

<sup>8</sup>See <http://www.legislation.gov.uk/ukpga/2014/12/contents/enacted>

<sup>9</sup>See UN General Assembly (2000) for the exact wording that defines trafficking, but to paraphrase, trafficking involves an action (i.e., the recruitment, transportation, transfer, harboring, or receipt of persons); a means (i.e., threat or use of force or other forms of coercion, abduction, fraud, deception, abuse of power or of a position of vulnerability, or giving or receiving of payments to achieve the consent of a person having control over another person); and a purpose (exploitation for labor or sex).

<sup>10</sup>See: [https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100\\_ILO\\_CODE:R190](https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:R190)

<sup>11</sup>See Messinger and Earn (2017) for an activist perspective on this problem.

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