

The Role of National Councils in Combating the Phenomenon of Child Labor in Egypt

**The National Council for Childhood
and Motherhood (NCCM) is a Model**

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Preamble

The National Council for Childhood and Motherhood (NCCM) was established in 1988 by Presidential Decree No. 54 of 1988, and was amended by Presidential Decree No. 273 of 1989. The council has been entrusted, among other things, with the responsibility of formulating policies, planning, coordinating, monitoring and evaluating activities related to the protection and development of children and mothers in Egypt, in collaboration with various non-governmental organizations.

The NCCM's primary mission is to protect and promote the rights of all Egyptian children, and to ensure their upbringing in a safe environment that helps to develop their physical, mental, spiritual, moral, and social capacities. The council is granted these powers based on the Egyptian Constitution and the Child Act No. 12 of 1996, amended by Act No. 126 of 2008.

In March 2011, the NCCM began to operate under the Ministry of Health and Population (MOHP), in clear violation of the Egyptian Constitution and the Paris Principles of 1993 on the establishment of independent national human rights mechanisms, for monitoring and following-up.

Combating child labor was a priority for NCCM before Egypt's January 2011 Revolution. However, after affiliation with the Ministry of Health and Population, the activities of the NCCM have undergone a significant transformation; it has overlooked serious issues like combating child labor, particularly the involvement of children in the worst forms of work, and all the focus of the council became on specific issues like the prohibition of underage marriage and combating female circumcision and family violence. Despite the gravity of these issues, they should not substitute the work on fighting the worst forms of child labor in line with the National Action Plan for Combating the Worst Forms of Child Labor in Egypt and Supporting Family (2018 – 2025), the SDG Goal No. 8.7, the International Labor Organization (ILO) Conventions, and relevant international and regional conventions and covenants signed by the Egyptian government.

Therefore, **Maat for Peace, Development and Human Rights** decided to issue a special report evaluating the role of the NCCM in combating child labor phenomenon, by focusing on the competencies of the council according to the

resolution of its establishment and its position in the Constitution and the law, in addition to the other resolutions and amendments that have been introduced to it since 1988 until today. The study also discusses the efforts made by the NCCM in this context, the obstacles facing its work, particularly in the last period, as well as its cooperation with the international organizations and donor community. Finally, the study touches upon the extent of the council's contribution to achieving the national plan to eliminate the worst forms of child labor and supporting family (2018-2030).

The Competencies of the NCCM under Article 3 of the Resolution of its Establishment¹:

- ✎ Proposing a general policy in the field of childhood and motherhood;
- ✎ Drafting a comprehensive national plan for childhood and motherhood in the different fields, especially in the field of social and family care, health, education, culture, media, and social protection within the framework of the general plan of the State;
- ✎ Following up and evaluating the application of general policy and national plan of childhood and motherhood, in light of the reports submitted by the ministries, bodies, and various actors, and issuing directives to work on removing obstacles;
- ✎ Gathering available information, statistics, and studies in the fields related to childhood and motherhood, evaluating their indicators and results, and determining the fields of benefit from them;
- ✎ Proposing the training programs that contribute to improving the level of performance in the implementation of childhood and motherhood activities;
- ✎ Proposing the suitable cultural, educational, and media programs for awareness of public opinion on childhood and motherhood needs, their problems, and methods of addressing them on a sound basis;
- ✎ Encouraging volunteer activity and expanding its size and base in the fields of childhood and motherhood;
- ✎ Cooperation between governmental and non-governmental organizations working in the fields of childhood and motherhood at the regional and international level;

¹ القرار الجمهوري رقم 54 لسنة 1988، الجريدة الرسمية العدد 5، 4 فبراير 1988، المادة الثالثة، على الرابط التالي: <https://bit.ly/3xWHxIS>

- ☞ The council, in light of its formation and competencies, must perform its coordinative role between the different ministries and public bodies, by issuing final and effective resolutions.



NCCM in Constitution & Law

Article 214 of the Egyptian Constitution reads: “National Councils have legal personalities and enjoy technical, financial, and administrative independence. They are to be consulted with regards to draft laws and regulations pertaining to their affairs and fields of work”.

Article 140 of Child Act reads: “A council named NCCM is established and has legal personality and based in Cairo; its establishment and competencies shall be determined by virtue of a decree of the president.”

The resolutions that has formed the council since its establishment in 1988:

- Presidential Decree No. 54 of 1988 on the establishment of the NCCM, provided that it operates under the Council of Ministers².
- Presidential Decree No. 273 of 1989, amending Law No. 54 of 1988 to make the NCCM operating under the Prime Minister³.

² المرجع السابق

³ القرار الجمهوري رقم 273 لسنة 1989، الجريدة الرسمية العدد 28، 17 يوليو 1989، على الرابط التالي: <https://bit.ly/2U7iqEA>

- Presidential Decree No. 75 of 2009 on the transfer of some competencies of NCCM in favor of the Minister of Family and Population.
- Resolution No. 28 of 2011 on making the NCCM operating under the Ministry of Health and Population⁴.
- Prime Minister's Resolution No. 2152 of 2016, on the restructuring of NCCM, headed by the Minister of Health and Population⁵.

The NCCM Efforts to Combat Child Labor:

Having reviewed the situation of the NCCM in the Egyptian Constitution and law, as well as the resolutions that have formed the council since its establishment, we explain in this part of the report the efforts made by the council to reduce the phenomenon of child labor, particularly before the council's operation under the Ministry of Health and Population. Some of the efforts can be summarized in the following:

- **Launching the Strategic Framework for Childhood and Motherhood and the National Plan from 2018 to 2030 (March 2018).** In this strategy, an entire chapter was devoted to combating child labor, in which it called for the need to review the legislation related to child labor, including updating the list of dangerous jobs and professions. In addition to building capacities of government agencies related to child labor, developing programs to address the phenomenon of child labor, expanding opportunities for training and vocational education, in addition to activating oversight, monitoring, and inspection mechanisms on child labor through training inspectors from the Ministry of Manpower, training members of child protection committees general and subsidiary, creating a database for working children⁶.
- **The program of expanding education and protection systems to capture children in danger.** This program was implemented by NCCM in partnership with UNICEF and funded by the European Union from 2016 to 2020. It aimed to support the government in strengthening the legal framework for the protection of children, and help the Egyptian government in preparing a procedure manual for dealing with children in danger. The overall target of the project is to increase opportunities of access to

⁴ تحديد تبعية المجلس القومي للسكان والمجلس القومي للأمومة والطفولة لوزير الصحة والسكان، الجريدة الرسمية العدد 10 مكرر(أ)، 16 مارس 2011، على الرابط التالي: <https://manshurat.org/node/7558>

⁵ قرار رئيس الوزراء رقم 2152 لسنة 2016، الجريدة الرسمية، العدد رقم 32 مكرر " 14 أغسطس 2016، على الرابط التالي:

<https://bit.ly/3ddWf6o>

⁶ انظر، الإطار الاستراتيجي والخطة الوطنية للطفولة والأمومة (2018-2030)، ص 198 على الرابط التالي: <https://bit.ly/3ilviWx>

education and protection for the poorest children to prevent them from dropping out of education and involvement in the worst forms of works⁷.

- **Working on promulgation of the Child Act No. 12 of 1996, amended by the Law No. 126 of 2008.** This Act was issued based on the efforts of the legislative workgroup inside the NCCM, which continued for nearly five years before its issuance. The third chapter of the Act addresses the phenomenon of child labor.
- **Implementation of the national program for the protection of young people from drugs** in partnership with the United Nations Office on Drugs and Crime, and a number of ministries, national councils, and non-governmental organizations, for countering the illegal use of children in trafficking in drugs and illicit psychotropic substances. The program also aimed at providing comprehensive training for youth to empower them to fight smoking and drugs, promoting the family role as a front line of defense that early detects the problem of addictions, and raising the capabilities of the social workers in schools, youth, and civil society centers and the cadres dealing with youth⁸.
- **Preparing the consolidated periodic reports submitted by Egypt** to the United Nations Committee on the Rights of the Child and its two optional protocols attached to the convention, participation in preparing the national report submitted by Egypt to the mechanism of universal periodic review and many other contractual committees at the United Nations, in addition to organizing many training courses for publication of the Convention on the Rights of the Child and the two optional protocols in schools in the period from February –December 2015, and in December 2017, in cooperation with the Ministry of Education and the National Center for Child Culture, and UNICEF to educate children about their rights. The Anti-Human Trafficking Unit at the NCCM has also organized a variety of training courses for the teachers and the persons dealing with the Non-Egyptian children, especially the Sudanese and Somalis, and implementing many activities with children to educate parents on how to deal with their children and avoid being trafficked or working as domestic workers.
- **Implementing the program “Children in Danger” by cooperation with the European Union.** With a budget of 20 million Euro, the program targeted five categories of children at risk who are (street children, workers, people with disabilities, girls subject to circumcision, or those who were

⁷ للمزيد على الرابط التالي: <https://bit.ly/3dbaTeT>

⁸ البرنامج القومي لحماية النشء من المخدرات، المجلس القومي للطفولة والأمومة، على الرابط التالي: <https://bit.ly/3xUao0v>

circumcised, and the children out of education). Through this program, many non-governmental organizations implemented programs in the governments in greatest need to improve the quality of life of the children at risk, including the children involved in the worst forms of work, and promoting their right to life, survival, and growth⁹.

- **Developing the national strategy to eliminate child labor** and its action plan in 2006. This strategy aimed at preparing preventive, curative, and rehabilitative programs for working children, and revising and amending policies and legislation related to child labor. The strategy is implemented in cooperation with relevant ministries, 23 non-governmental organizations, businessmen, and international partners.
- **The implementation of a project to combat child labor in hazardous foundries in the province of Qaliubiya.** It is a pilot project implemented by the NCCM in Qaliubiya, which is home to the largest gathering of foundries in Greater Cairo. The project implementation began in 2008 and continues to the present moment. It aims to eliminate the worst forms of child labor, as these children are subjected to countless health risks due to spending long hours in these factories exposed to dangerous materials such as lead, copper, and chromium. The work on this project began by conducting a survey study to find out the characteristics and conditions of child labor in these areas. This project aims to provide children with alternative options, such as educational and training opportunities that develop their abilities and create safe working conditions, as well as providing alternative support to the families of these children through loans that help them improve their incomes. The project works by creating partnerships with families, non-governmental organizations, the private sector, other concerned bodies, and the local community to ensure the continuity of applying the proposed solutions.¹⁰
- **Protection of children working in the city of craftsmen.** It is a pilot project implemented by the NCCM in 1996, and continued until 2002 to protect 700 children working in small workshops in the city of craftsmen in a suburb of Cairo. The project provided children with integrated services, including appropriate education, health care, and health awareness¹¹.

⁹ التقارير الأولية للدول الأطراف الواجب تقديمها في عام 2004، مصر، ص 7 ، علي الرابط التالي: <https://bit.ly/3xW4s7g>

¹⁰ تقرير مصر الدوري الثالث والرابع المقدم إلى لجنة حقوق الطفل، ص 87، علي الرابط التالي: <https://bit.ly/3wGJKbu>

¹¹ التقرير الدوري الجامع للتقاريرين الثالث والرابع إلى لجنة حقوق الطفل، مصر، ص 86، على الرابط التالي:

https://www2.ohchr.org/english/bodies/crc/docs/CRC.C.EGY.4_ar.doc

Despite the efforts made by the NCCM from the beginning of its establishment and even before the Egypt's January 2011 Revolution in reducing child labor, the main turning point in the work of the council was its operation under the Ministry of Health and Population on March 16, 2011, based on Resolution No. 28 of 2011¹². After affiliation with the MOHP, the activities of the NCCM have undergone a significant transformation; it has overlooked serious issues like combating child labor, and it could no longer have the final say on many resolutions on children in Egypt¹³, as its independency has been undermined. This has drove workers in the council to reject the resolution and protest against it more than once¹⁴. In addition, this affiliation represents a clear violation of the Egyptian constitution, which stipulates that the national councils have legal personalities and enjoy technical, financial, and administrative independence.

The status quo of the NCCM:

After affiliation with the MOHP, the NCCM has become dependent council, and its activities have undergone a significant transformation that can be summarized as follows:

- ✎ **Failure to activate the general and sub-committees for child protection** whether at the governorate or center and neighborhood levels. These committees technically follow the NCCM, and they play a key role in the preventive intervention before children are harmed, and in responding to the risks associated with protection problems concerning children such as violence, sexual exploitation, abuse, and neglect¹⁵. This is as explained in article 96 of the Child Act No. 12 of 1996, amended by Law No. 126 of 2008¹⁶. Accordingly, the work of the child protection committees is supposed to include receiving reports about children at risk, including those who are involved in the worst forms of work that result in harm to their health, development, moral behavior, or any other form of exploitation, that is through meeting weekly to find out the problems that have been monitored during the week and the preparation of the next week's plan, and among the powers of the committee is to summon the child's parents or

¹² مصدر سبق ذكره، على الرابط التالي: <https://manshurat.org/node/7558>

¹³ الدكتورة هالة أبو على رئيس المجلس القومي للأمومة والطفولة للأهرام: القضاء على ظاهرة أطفال الشوارع خلال خمس سنوات، الأهرام، 14

يوليو 2016، على الرابط التالي: <https://bit.ly/3gSQ4qS>

¹⁴ «القومي للطفولة» يرفض التبعية لـ«السكان»، المصري اليوم، 31 مارس 2015، على الرابط التالي: <https://bit.ly/2U4cAnu>

¹⁵ تتبع لجان حماية الطفل إدارياً ومالياً للمحافظ وذلك طبقاً لقانون الحكم المحلي والمادة 97 من قانون الطفل الذي ينص على ذلك لأن من يختص بتشكيل اللجان هو المحافظ. أما عن التبعية الفنية فهي للمجلس القومي للطفولة والأمومة لأنه معني بالأعمال التي من شأنها حماية الطفل وكذلك ليتم ربط الحالات التي يتم رصدها عن طريق الإدارة العامة لنجدة الطفل 16000.

¹⁶ قانون الطفل رقم 12 لسنة 1996 المعدل بالقانون رقم 126 لسنة 2008، المادة 96، على الرابط التالي: <https://bit.ly/2Srgbvw>

legally responsible for him and warn him in the prosecution in case he abused his child¹⁷. These committees are also supposed to be present in the Child Prosecution Office to follow up the investigations to which one of the child victims is a part, however, these committees do not exercise this role that they are entrusted with, and according to the reports of non-governmental organizations, the Child Prosecution Office often was using the civil society organizations to attend with children instead of child protection committees¹⁸.

Until recently, according to Nasr Musallam, Director General of Development and Gender at NCCM, only 10 out of 27 governorates have active child protection committees, and some of these committees do not have headquarters and are forced to meet in administrative headquarters affiliated with the governorate. In a related context, the complaints, received from the regions to the Child Help Plan, are transferred to the Child Protection Subcommittees, but they are not received directly despite what the law stipulates that the Subcommittee must receive the communications transferred from the Child Rescue Plan, but what happens is that the subcommittees transfer these calls to some non-governmental organizations located in the center or neighborhood to deal with the communication¹⁹.

☛ **The Child Rescue Plan²⁰ does not respond to child labor complaints.**

In addition to the deficient role of child protection committees in reducing the risk of children involvement in the worst forms of work prohibited by Ministerial Resolution No. 118 of 2003 and Labor Organization Convention No. 182 of 1999, we find that the Child Rescue Plan No. 16000 of NCCM did not intervene in the issue of fight against child labor, and did not consider it one of its competencies, and its interventions were limited to preventing minors' marriage, female circumcision, and issues related to family neglect, and this contradicts its tasks entrusted to it as a mechanism for monitoring children's rights and for receiving complaints related to any form of child abuse.

☛ **Incomplete responsibility for unaccompanied children.** Law No. 82 of 2016 on combating illegal immigration and smuggling of migrants has made NCCM in article 3 the body entrusted with the responsibility of unaccompanied children whose legal representative has not been established.

¹⁷ «المصري اليوم» تبحث عن مقار لجان حماية الأطفال في 3 محافظات.. والمحصلة «صفر»، المصري اليوم، 20 يوليو 2017، على الرابط <https://bit.ly/2U6MgcN> التالي

¹⁸ المرجع السابق

¹⁹ المرجع نفسه

²⁰ أنشئ الخط المجلس القومي للطفولة والأمومة بالتعاون مع المنظمة الدولية لخط نجدة الطفل في أمستردام بهولندا

However, a large number of these children are still exploited by criminal networks who use them in begging and other illegal acts such as prostitution and forced labor in contravention of SDG 8.7. Not to mention the absence of any database to the present moment for unaccompanied children, which is an issue at the heart of the council's work²¹.

☞ **The General Department for Child Rescue does not exist.** according to Child Act No. 12 of 1996 amended by Law No. 126 of 2008, article 97 also provides for the establishment of a department known as the “General Department for Child Rescue” affiliated with NCCM, whose tasks include following up the general and subsidiary child protection committees and receiving complaints from children and adults, but according to Ahmed Moslehi, head of the Child Defense Network, the administration does not exist, pointing out that there is a technical secretariat that supervises the committees, as the technical supervision of the committees of the National Council for the Child and the administrative and financial supervision of the governorate and neighborhood ²².

☞ **Absence of cooperation with civil society organizations.** Before the NCCM affiliation with the Ministry of Health and Population, there was fruitful cooperation with the non-governmental organizations and various civil associations. For example, the National Child Rights Coalition, which includes about 65 other organizations, was a partner of the council, but that did not last long²³. According to Doaa Abbas, head of the Legal Society for Child and Family Rights, the role of NCCM diminished after the January 2011 revolution, and it ignored the role of civil society, and dealt with specific non-governmental organizations and did not prefer dealing with other associations and institutions. She explained, “My association tried to meet the Secretary of NCCM more than once, but she did not receive a response to that”²⁴.

The challenges facing the NCCM:

☞ In March 2011, the NCCM began operation under the Ministry of Health and Population instead of the Council of Ministers, which was rejected by the Council members themselves. This affiliation contravenes the Egyptian

²¹ قانون مكافحة الهجرة غير الشرعية وتهريب المهاجرين رقم 82 لسنة 2016، الجريدة الرسمية، العدد 44 مكرر أ، 7 نوفمبر 2016، علي الرابط التالي: <https://manshurat.org/node/13565>

²² قانون الطفل رقم 12 لسنة 1996 المعدل بالقانون رقم 126 لسنة 2008، المادة 97، علي الرابط التالي: <https://bit.ly/3wXB1lh>

²³ 65 منظمة حقوقية تطالب بوقف ضم "القومي للطفولة" للصحة، اليوم السابع، 22 مارس 2011، على الرابط التالي: <https://bit.ly/3jsH2CL>

²⁴ مصدر سبق ذكره، على الرابط التالي: <https://bit.ly/2U6MgcN>

constitution which provided for the independency of the national councils, and that they have legal personality and report to the Council of Ministers.

- ☞ Appointing employees in child protection committees, whether general or subsidiary, which are not fully dedicated to the tasks of these committees, most of them perform these tasks besides their basic governmental work, under the need of each children case to follow up to 9 months, according to Jamal al-Khatib, Adviser to the Secretary-General of the NCCM, which makes the tasks of these employees difficult.
- ☞ Lack of trained media cadres to deal with the issues of children's rights from a human rights point of view.
- ☞ Absence of subcommittee headquarters in the different centers due to the administrative dependency of the committees on the government, the national council has no administrative authority on these committees and they are formed by the Governor according to law.
- ☞ Absence of an independent budget for the general and subcommittees for child protection, the source of the budget of these committees is the allocations of neighborhoods and centers.
- ☞ These committees lack the logistic tools to carry out their work, like the computers to write a case study on or even papers for use or ink for paper printing.
- ☞ The subcommittees for child protection have no administrative structure and no powers to motivate or punish the employee in case of default, the employees of these committees are not paid except for low allowances if they go to deal with the case of a child at risk, and this rarely happens.

Cooperation with international organizations and donor community on combating child labor

United Nations Children's Fund "UNICEF"

Since its establishment in 1988, the NCCM has cooperated with many international bodies and donor community. This cooperation started in partnership with UNICEF by concluding conventions in more than one field. The organization contributed to funding some studies on childhood and motherhood in the five-year plan (97/98 – 2001/2002), in addition to funding the preparation of the second report to follow up the implementation of the Convention on the Rights of the Child (CRC), which is submitted to the United Nations Committee on the Rights of the Child. This partnership also resulted in launching a comprehensive 10-year national action plan in cooperation between the council and UNICEF, which

prioritizes the issues related to child protection, including child labor, poverty alleviation, and street children ²⁵.

This cooperation continued till this moment, but it is noted that there are few joint projects between the council and UNICEF regarding the fight against child labor, and often the aspects of cooperation are in other issues like combating child marriage, combating female circumcision, and supporting girls' education and preventing them from dropping out of education.

European Union

The European Union is a key partner of the NCCM in Egypt. The European Union has funded many projects, programs, and campaigns carried out by the council, whether related to the fight against child labor or other issues related to child protection. The last campaign was "I am against bullying" for combating bullying against children in Egypt. The European Union also budgeted 20 million Euro before for implementing the program "Children in Danger" with the participation of 101 non-governmental organizations in the different governorates of Egypt, the European Union targeted in this program five categories of children at risk (street children, workers, people with disabilities, girls subject to circumcision or those who were circumcised, and the children out of education).

International Labor Organization (ILO)

The current aspects of cooperation between the council and ILO are working on activating the council's role in the national plan to combat the worst forms of child labor and family support. NCCM, along with the international organization, is scheduled to participate in more than one event in the framework of the ILO regional project activities "Accelerate the elimination of child labor in the supply chains in Africa", which is funded by the Dutch government²⁶.

Plan International Organization

Plan International is one of the international organizations that constantly cooperate with NCCM, on various projects including combating child labor, particularly the worst forms of child labor. On 12 June 2021, on the occasion of the World Day Against Child Labor, the organization, in partnership with NCCM,

²⁵ النظر في التقارير المقدمة من الدول الأطراف، الملاحظات الختامية مصر، ص 5، علي الرابط التالي:

<http://hrlibrary.umn.edu/arabic/CRC11.pdf>

²⁶ إطلاق خطة تفعيل دور القومي للطفولة لمكافحة عمل الأطفال، الدستور، 25 أبريل 2021، علي الرابط التالي:

<https://www.dostor.org/3435921>

prepared a visual content that includes concepts about child labor in the Egyptian Children's Code, and the mechanisms related to child protection in Egypt from the worst forms of work²⁷. Plan International also contributed to preparing the procedural manual for protecting and assisting the asylum-seeking and refugee children, and victims of migrant smuggling and human trafficking, which was prepared by NCCM²⁸.

United States Agency for International Development (USAID)

The aspects of partnership and cooperation between the USAID and the national council are **funding the project to combat violence against children** with a budget of 10 million dollars. This project worked on activating the provisions provided in the Child Act promulgated by Law No. 12 of 1996, amended by Law No. 126 of 2008, including the provisions related to child labor, by training cadres working in the enforcement of the child rights, as well as improving the services of the governmental and non-governmental organizations provided to the children at risk, and raising the level of protection provided to them, with a focus on street children and children in conflict with the law.

NCCM and the national plan to combat the worst forms of child labor

The strategy for implementing the national plan to combat the worst forms of child labor and supporting family (2018-2030) is divided into more than one axis. NCCM is responsible for implementing some of these axes in the strategy and a partner in implementing others. In the table below, we explain the efforts of the council in implementing the strategy of the national plan to combat the worst forms of child labor and family support:

²⁷ يمكن العودة إلى المحتوى المرئي من خلال الرابط التالي: <https://bit.ly/35PTy7d>
²⁸ "الطفولة والأمومة" يطلق الدليل الإجرائي لحماية الأطفال ملتمسي اللجوء، مصراوي، 19 يناير 2020، علي الرابط التالي:

<https://bit.ly/3gWYn4S>

No.	Target	Achieved or not
1	Harmonization the legislative framework for child labor with the ILO conventions, treaties, and covenants related to child labor	(has not been achieved) The Child Act and its implementing regulations still involve legislative loopholes regarding the fight against child labor
2	Raising Awareness of child labor	(has been achieved) NCCM launched the strategic framework and the National Plan for Childhood and Motherhood (2018-2030). In this strategy, an entire chapter was devoted to combating child labor and working on knowledge promotion on child labor.
3	Promotion, monitoring, protection, and prevention of child labor through building the technical capabilities of the stakeholders.	(has not been achieved) Maat has not monitored any training related to building technical capabilities of the stakeholders for preventing child labor by NCCM.
4	Raising social awareness and mobilization to fight against child labor	(has not been achieved) Except for visual content published by the official page of the NCCM on the social media website Facebook, we have not seen any other efforts regarding the awareness related to the fight against the worst forms of child labor.

Recommendations:

Maat for Peace, Development and Human Rights recommends the following:

- ☛ The need for the independency of NCCM as a legal person as stated in article 214 of the Egyptian constitution.
- ☛ NCCM should cooperate with civil society organizations, for example, the 8.7 coalition to make clear progress in fighting against the worst forms of child labor and eliminating child labor by 2025, in accordance with the Sustainable Development Goal 8.7.
- ☛ Ensure that the NCCM obtains sufficient human, technical, and financial resources, ensuring its independency, and promotion of its strength in its relationship with all ministries and other government entities at the central, governorate, and center levels.
- ☛ Develop a system for effective coordination and exchange of information between child protection committees at the governorate level (general committees) and centers (subcommittees).
- ☛ Consider amending article 97 of Child Act No. 12 of 1996 amended by Law No. 126 of 2008, provided that the formation of child protection committees is within the competencies of the NCCM and not the competence of the governor, and that the administrative, financial, and technical dependency to be on the NCCM.