



## Joint Submission on List of Issues and Written Replies from Government of Ghana for 100th Session of the UN Committee on the Rights of the Child Review of Ghana

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The Consortium for Street Children (CSC) is the leading international network dedicated to realising the rights of Children in Street Situations. We are committed to creating a just sustainable future for some of the most disadvantaged and stigmatised children by working together to inform and inspire research and action that influences policy and practice worldwide. CSC leads a network of over 200 members working with Children in street situations in 111 countries.

This submission was coproduced with members of the Consortium for Street Children's West Africa Strategic Advocacy Group (WASAG) in Ghana: Street Children Empowerment Foundation (SCEF), Muslim Family Counselling Service (MFCS), Safe Child Advocacy, WUZDA, Centre for Initiative Against Human Trafficking (CIAHT) and Starlight Foundation.

### Introduction

This submission responds directly to the UN Committee on the Rights of the Child's List of Issues (LOI)<sup>i</sup> and the Government of Ghana's written replies<sup>ii</sup>. It focuses specifically on areas most relevant to children in street situations in Ghana, including: budgetary allocation and implementation of the national strategic plan, child labour and trafficking, birth registration and legal identity, access to justice, and data and monitoring gaps.

We strongly welcome Ghana's significant and proactive steps to strengthen access to justice and protect the rights of children in street situations since its last reporting cycle in 2021<sup>iii</sup>. Ghana launched its first ever Five-Year Strategic Plan for Street-Connected Children and Young Persons (2024 – 2028) and the Ministry of Gender, Children and Social Protection established a Sub-Technical Committee to guide implementation with strong representation and collaboration from civil society including members of the Coalition for Street-Connected Organisations in Ghana (CSCC) and the Consortium's West Africa Strategic Advocacy Group (WASAG)<sup>iv</sup>.

Ghana has expanded child-friendly justice systems, increased investment in social protection measures, and mobile birth registration is being rolled out across all districts, while national efforts to combat child labour and trafficking have been strengthened through dedicated action plans and law-enforcement training<sup>v</sup>. Ghana's commitment to global pledges on ending violence against children also demonstrates political will to leave no child behind and strengthen legal protections and non-discrimination for children in street situations<sup>vi</sup>.

Despite these advances, the Five-Year Strategic Plan for Street-Connected Children and Young Persons (2024–2028) recognises that children in street situations across Ghana continue to face violence, systemic discrimination, and routine exclusion from essential services, including legal identity, healthcare, education and justice. The following key recommendations are intended to support Ghana in ensuring that the Strategic Plan not only delivers positive change through domestic legal and policy reforms, but also sets a new global benchmark for the implementation of UNCRC General Comment No. 21 on Children in Street Situations<sup>vii</sup>:

- **Prohibit discrimination based on street-connected status** and repeal legislation, by-laws and policing practices that criminalise survival behaviours including round ups or arrests for loitering, vagrancy and begging.
- **Allocate a dedicated, ring-fenced budget and establish a fully resourced Secretariat** to operationalise and monitor the implementation of the Five-Year Strategic Plan for Street-Connected Children and Young Persons (2024–2028).

- **Remove procedural and financial barriers to birth registration** and rollout flexible identity documentation processes to guarantee universal access to essential services for children in street situations including healthcare, education and justice.
- **Expand safe, independent, child-friendly reporting and complaints mechanisms**, including mobile outreach by Commission on Human Rights and Administrative Justice (CHRAJ) accessible to street-connected children.
- **Strengthen protections for children in street situations vulnerable to labour exploitation and trafficking**, including cross-border child protection safeguards and best-interest determinations for any return or repatriation processes.
- **Formally partner with and fund grassroots organisations and street social workers**, recognising their essential role in prevention, protection, and enabling safe and meaningful child participation in policies and programmes.
- **Embed an ethical and child-rights based approach to collecting reliable, disaggregated data on children in street situations.**
- **Embed safe, meaningful, long-term participation of children in street situations** in the design, implementation and reporting on the Five-Year Strategic Plan for Street-Connected Children and Young Persons (2024–2028).

### Budgetary resources

*“(1)(2)(d) The Committee notes that effective implementation requires the earmarking of sufficient, targeted budgetary resources for children’s rights, particularly for health, education, and protection of children in vulnerable situations”*

*“(13)(d) To compile information and develop public policies to ensure special protection for children in street situations”*

The UN Committee on the Rights of the Child General Comment No. 21 on Children in Street Situations (2017), urges States to “*make the necessary budget allocations for children in street situations*” in order to fulfil their obligations under the Convention<sup>viii</sup>. Ghana has acknowledged that “the implementation of the 5-year strategic plan will undisputedly require a lot of resources if the set outcomes are to be achieved” and has pledged to set up a dedicated fund and “solicit for more resource allocation” including from donors and the private sector.<sup>ix</sup> However, the latest Budget Statement and Economic Policy for the financial year 2026 does not dedicate funding to implement the plan<sup>x</sup>, while the strategic plan itself does not provide cost estimates for outcomes. Adequate staffing, capacity, and a ring-fenced budget is essential to ensuring the protection and care of street-connected children across Ghana. We recommend the Government of Ghana:

- **Allocate a dedicated, ring-fenced budget and establish a fully resourced Secretariat to operationalise and monitor the implementation of the Five-Year Strategic Plan for Street-Connected Children and Young Persons (2024–2028).**

### Child Labour and Trafficking

*“(13)(b) To reduce the prevalence of child labour in the State party, particularly in fisheries, mining, quarrying and agriculture, prayer camps, the trokosi system, commercial sexual exploitation, domestic servitude, the portering of heavy loads and street begging”*

*“(13)(e) To enact and implement legislation to address trafficking in children, to investigate and prosecute trafficking offences and to improve data collection efforts to ensure reliable data on trafficking in children”*

Extreme poverty continues to push many children in Ghana into street situations, where they face heightened vulnerability to multiple forms of violence, discrimination and exploitation. With families lacking stable income or access to adequate social protection – children are often forced to drop out of school and pursue precarious

livelihoods on the streets. Many street-connected children working in hazardous sectors (e.g. street hawking, cocoa farming, mining and fishing industries) are exposed to physical hazards, health risks<sup>xi</sup>, exploitative and unsafe conditions, disrupted education, harassment and sexual exploitation and abuse, which violate their rights to protection, equality and non-discrimination, survival and development, education, and health among others<sup>xii</sup>.

Kayayei (market porters) are young women and girls, often from rural communities in the northern regions of Ghana, who migrate to major cities such as Accra, Kumasi and Tamale in search of education and economic opportunities. Kayayei often face overlapping vulnerabilities from entrenched gender discrimination, unsafe and exploitative working conditions, exposure to crime, health hazards, and frequent verbal, physical, and sexual abuse. Children involved in rural-urban migration are vulnerable to becoming trapped in cycles of exploitation and hardship. In the absence of safe alternatives, many are forced into survival sex to meet basic needs such as food, water, or shelter.

Children without legal identity, including those in street situations and migrant children are at especially high risk of trafficking, as they are difficult to trace across porous borders. Headcount exercises conducted by Muslim Family Counselling Services (MFCS) and other partners (e.g. Chance for Children and Save Child Advocacy) in Asafo, Kumasi (2013 and 2021) indicate that many girls in street situations especially those engaged in or pushed into commercial sexual exploitation were mostly trafficked across the border from Nigeria.

Ghana's Five-Year Strategic Plan for Street-Connected Children and Young Persons (2024 – 2028) includes the commitment to develop guidelines for addressing the issues of street-connected children of foreign nationality who are frequently victims of child trafficking, including through a needs assessment that covers specific barriers to access essential services, safety, trafficking and repatriation. However, safeguarding measures could be strengthened further to ensure any detention of street connected children of foreign nationality is used strictly as a measure of last resort and for the shortest appropriate period, and that any return or deportation procedures are grounded in best-interest determinations and fully compliant with international law. We recommend the Government of Ghana:

- **Strengthen safeguards for children in street situations of foreign nationality** by ensuring detention is a last resort and that any return or deportation follows rigorous guidelines and best-interest determinations in line with international law.

### Hidden Barriers to Birth Registration and Legal Identity

*“(5)(a) To ensure that all children born in the State party are registered and issued free birth certificates, including children in rural areas and asylum-seeking and refugee children”*

Lack of legal identity is a major structural barrier preventing children in street situations from accessing essential services such as education, healthcare, justice systems, and social protection. Without birth registration, these children remain invisible to the state and unable to claim basic rights. UNCRC General Comment No. 21 (2017) notes that children in street situations often fall outside traditional assumptions about family and residence. Yet services in Ghana are often rigid and poorly adapted to their lived realities.

While Ghana has made commendable progress in expanding mobile birth registration systems across all districts and improving access in rural areas, children in street situations – who are densely concentrated in urban centres such as Accra, Kumasi and Tamale – continue to face significant barriers. They represent a highly mobile population with limited family and social support structures – exacerbating barriers to conventional registration approaches. The exclusion of children in street situations from obtaining retroactive birth registration is reinforced by hidden costs, complex procedures, requirements around parental/guardian consent, digital exclusion and long distances to travel to registration centres<sup>xiii</sup>. These practical obstacles intersect with stigma and discrimination

from service providers, perpetuating their marginalisation and heightening their vulnerability to violence, exploitation and abuse.

While Ghana's 5-year strategic plan includes a commitment to "take steps to reduce barriers to essential services for street connected children", it does not specify measures required to guarantee access to legal identity<sup>xiv</sup>. This pledge could be strengthened as birth registration is often the gateway to basic rights. UNCRC General Comment No. 21 (2017) states that "as a minimum, States should ensure that free, accessible, simple and expeditious birth registration is available to all children at all ages" with a recommendation that "children in street situations should be supported proactively to obtain legal identity documents" including through flexible and innovative approaches<sup>xv</sup>. We recommend the Government of Ghana:

- **Guarantee universal access to legal identity for all children, including those in street situations, by ensuring that birth registration is free, accessible, simple, and expeditious at any age.** This should include proactive outreach measures, mobile registration services, simplified procedures for children without caregivers, and temporary or alternative documentation pathways, in full alignment with UNCRC General Comment No. 21.

### Access to Justice and Accountability

*"(1)(2)(f) The State party should provide the Commission on Human Rights and Administrative Justice (CHRAJ), particularly its Women and Children's Unit, with sufficient human, technical, and financial resources to ensure its functional autonomy"*

*"(1)(2)(g) To ensure pathways for access to justice and remedies for children, including administrative complaint mechanisms and child-friendly judicial procedures."*

*"(14) Please provide information on the measures taken to implement the Committee's previous recommendations<sup>15</sup> to adopt the justice for children policy, establish specialized child justice court facilities, ensure that the deprivation of liberty is used only as a measure of last resort and for the shortest possible amount of time and ensure that children are not detained together with adults"*

Ghana has made commendable progress in child-friendly justice, including establishing child-friendly courts, introducing a nationwide child-friendly policing standard operating procedure, expanding child-protection services, and providing child-sensitive training to justice stakeholders. We further welcome reforms to the Child Rights Act and Juvenile Justice Act which aim to strengthen diversion and fully uphold the "best interests" principle in line with the UN Convention on the Rights of the Child.

Despite these advances, children in street situations still face a multitude of barriers to justice. Many lack awareness of their rights or access to basic services. Systemic obstacles such as lack of legal identity, complex legal procedures, social stigma, and distrust of authorities further limit their access. Street-connected children often come into contact with police due to survival behaviours, such as loitering or survival sex. Fear of criminalisation, reprisals, or further victimisation prevents many from seeking assistance or reporting abuse.

These risks are compounded by the absence of safe, independent reporting mechanisms and limited access to legal aid, psychosocial support, and trauma-informed protection measures. In order to deliver on Ghana's 2024 Global Ministerial pledges to strengthen child-centred justice systems, the government must expand accessible, confidential reporting and support mechanisms for all children, including those in street situations by 2030<sup>xvi</sup>.

UNCRC General Comment No. 21 also urges States to immediately repeal laws and practices that directly or indirectly discriminate against children due to their street-connected status: "abolish any provisions allowing or supporting the round-up or arbitrary removal of children and their families from the streets or public spaces; abolish where appropriate offences that criminalize and disproportionately affect children in street situations, such

as begging, breach of curfews, loitering, vagrancy and running away from home; and abolish offences that criminalize children for being a victim of commercial sexual exploitation, and so-called moral offences, such as sex outside of marriage<sup>xvii</sup>.”

However, there is no explicit legal prohibition of police round-ups of street-connected children in Ghana. Additionally, without birth certificates or reliable age documentation, children in street situations are often presumed to be older than they are and are therefore vulnerable to criminalisation under the [Beggars and Destitutes Act 1969 \(NLCD 392\)](#), section 2(1) which provides that “any person found begging and any person wandering or placing himself in any premises or place for the purpose of begging may be arrested by a police officer without warrant and shall be liable on conviction to a fine not exceeding fifty new cedis or to imprisonment not exceeding three months or to both<sup>xviii</sup>”. Detention with adults places children at heightened risk of violence, sexual exploitation and abuse, and denies them special protection afforded in the youth justice system.

Ghana’s Child-Friendly Policing Standard Operating Procedure represents a global promising practice model for addressing these protection gaps and justice barriers facing street connected children. It recognises children in street situations as rights-holders in need of care and protection, rather than treating them as offenders or delinquents<sup>xix</sup>. The guidance is trauma-informed, promotes diversion and alternatives to detention, embeds non-discrimination and child-centred approaches to justice, and prioritises the “best interests” of the child in line with the UN Convention on the Rights of the Child.

However, the impact of this progressive framework is hindered by uneven local implementation at the district level, and gaps in sustained capacity-building and sensitisation with law enforcement. To realise its full potential, systematic refresher training, regular field-level audits, and dedicated resourcing are urgently needed – including through collaboration and funded partnerships with locally embedded civil society organisations and street social workers – who hold deep expertise and trust with children most at risk. We recommend the Government of Ghana:

- **Impose an immediate national moratorium** on all street sweeps, round-ups, and the arrest or detention of children in street situations for status offences or survival behaviours including loitering, vagrancy, begging, or survival sex in line with UNCRC General Comment No. 21.
- **Institutionalise sustained, nationwide training for police and law enforcement** on Ghana’s Child-Friendly Policing Standard Operating Procedure, developed and delivered in partnership with civil society, with specific modules on the rights, specific needs, and vulnerabilities of children in street situations and on trauma-informed, non-discriminatory policing practice.
- **Establish a child-safe, confidential, and independent complaints and reporting mechanism**, including proactive mobile outreach by the Commission on Human Rights and Administrative Justice (CHRAJ), to ensure that children in street situations can safely report abuses without fear of reprisal or criminalisation.
- **Implement the recommendations of the 2025 UN Special Rapporteur on the Sale, Sexual Exploitation and Sexual Abuse of Children’s report on a “child-centred response to the sexual exploitation of children in street situations”**, including ensuring access to basic services, safe reporting of abuse, and child-rights-based police training<sup>xx</sup>:

## Data and Monitoring Gaps

“(17) Please provide updated statistical data, for the past three years, disaggregated by age, sex, ethnic origin, national origin, geographical location and socioeconomic status, on the following: (a) Cases of abuse and violence perpetrated against children, including torture, inhuman or degrading treatment, all forms of corporal punishment, sexual abuse in and outside of the home, domestic violence, bullying and online sexual violence and abuse, and on prosecutions and sentences handed down in the State party in such cases; (g) children in street situations”



Despite their resilience and agency, children in street situations are often overlooked and rendered invisible within legal, policy and data systems due to severe and persistent data gaps. They are a highly mobile and fluid population, not captured in census data, and excluded from household surveys. Some grow up entirely on the streets, while others spend much of their lives there despite having a home.

Gathering data on marginalised children, including those in street situations, entails significant safeguarding and data-protection risks. Without robust safeguarding measures in place, research can inadvertently expose children to harm, including retraumatisation or the misuse of sensitive information (e.g. traffickers, abusers). Ethical data collection demands obtaining full and informed consent, ensuring voluntary participation and utilising child-friendly methods and trauma informed approaches that are sensitive to risk, safe and accountable<sup>xxi</sup>.

Ghana's Five-Year Strategic Plan recognises the urgency of these data gaps, with Strategy 1 calling for "nationwide data collection on children in street situations," including a national headcount. While observational headcounts conducted by NGOs (e.g. StreetInvest and the Muslim Family Counselling Services) offer promising models, they are too often underfunded and ad hoc. The Ministry of Gender, Children and Social Protection has itself acknowledged the monitoring and evaluation limitations of previous data collection efforts in 2015 and 2017<sup>xxii</sup>.

Tools already exist to strengthen national approaches. The Consortium for Street Children have developed a resource pack on empowering street-connected children to participate in advocacy, offering trauma-informed, gender-sensitive, and participatory tools that align with UNCRC General Comment 21 and can inform national data collection<sup>xxiii</sup>. We recommend the Government of Ghana:

- **Embed a child-rights based approach to collecting reliable, disaggregated data on children in street situations within its Five-Year Strategic Plan for Street-Connected Children and Young Persons (2024–2028)** - including through safe and respectful participatory research underpinned by robust ethics, safeguarding and data-protection guarantees.

### Ensuring Safe and Meaningful Child participation

Safe and meaningful child participation must be central to Ghana's commitment to advancing the rights of children in street situations. This requires sustained investment in locally embedded civil society organisations and street social workers, whose trusted relationships and community-rooted expertise make them indispensable partners. Their contextual understanding of the street connected children's lived realities enables safe participation, strengthens prevention and response to violence, exploitation and abuse, and ensures that children can genuinely influence the policies and programmes that affect their lives. Formalising and adequately funding these partnerships would significantly reinforce national efforts to uphold the rights of street-connected children.

Ghana can draw on promising practice models to embed child participation as the cornerstone of its Five-Year Strategic Plan for Street-Connected Children and Young Persons (2024–2028). The Consortium for Street Children's "Street Champion" model empowers children in street situations as right holders through participatory research and advocacy rooted in lived experience. By centering their voices as rights-holders, it builds their resilience, confidence, and rights awareness, and it draws on years of work in Ghana, India, Kenya, and Sierra Leone, demonstrating its adaptability in diverse contexts.

Similarly, initiatives such as Ghana's Children's Parliament, supported by the Street Children Empowerment Foundation (SCEF), help create child-friendly spaces for children to contribute directly to policy making. These models ensure that children's perspectives are not only heard but shape the co-design, implementation, and monitoring of national policies and programmes. By championing and embedding these participatory approaches, Ghana can set a strong example across the region. We recommend the Government of Ghana:

- **Ensure children in street situations are involved in planning, policy formulation, and reporting on Ghana’s Five-Year Strategic Plan for Street-Connected Children and Young Persons (2024–2028)** including through long-term, accessible, and child-friendly platforms where they can voice their experiences, needs, and solutions on the issues that affect them institutionalised at local, national, and global levels.

<sup>i</sup> [https://tbinternet.ohchr.org/\\_layouts/15/treatybodyexternal/Download.aspx?symbolno=CRC%2FC%2FGHA%2FQ%2F6-7&Lang=en](https://tbinternet.ohchr.org/_layouts/15/treatybodyexternal/Download.aspx?symbolno=CRC%2FC%2FGHA%2FQ%2F6-7&Lang=en)

<sup>ii</sup> [https://tbinternet.ohchr.org/\\_layouts/15/treatybodyexternal/Download.aspx?symbolno=CRC%2FC%2FGHA%2FRQ%2F6-7&Lang=en](https://tbinternet.ohchr.org/_layouts/15/treatybodyexternal/Download.aspx?symbolno=CRC%2FC%2FGHA%2FRQ%2F6-7&Lang=en)

<sup>iii</sup> [https://tbinternet.ohchr.org/\\_layouts/15/treatybodyexternal/Download.aspx?symbolno=CRC%2FC%2FGHA%2F6-7&Lang=en](https://tbinternet.ohchr.org/_layouts/15/treatybodyexternal/Download.aspx?symbolno=CRC%2FC%2FGHA%2F6-7&Lang=en)

<sup>iv</sup> <https://www.mogcsp.gov.gh/formation-of-sub-technical-committee-for-street-connected-children-and-young-persons/>

<sup>v</sup> <https://www.unicef.org/ghana/press-releases/new-ghana-accelerated-action-plan-against-child-labour-2023-2027-launched>

<sup>vi</sup> <https://endviolenceagainstchildrenconference.org/wp-content/uploads/2024/11/Ghana-pledge.pdf>

<sup>vii</sup> <https://www.streetchildren.org/resources/general-comment-no-21-2017-on-children-in-street-situations/>

<sup>viii</sup> <https://docs.un.org/en/CRC/C/GC/21>, section B, para 13, p6

<sup>ix</sup> Five-Year Strategic Plan for Street-Connected Children and Young Persons (2024–2028), p19

<sup>x</sup> <https://mofep.gov.gh/publications/budget-statements>

<sup>xi</sup> <https://www.hrw.org/news/2024/11/18/ghana-submission-un-committee-rights-child>

<sup>xii</sup> <https://www.state.gov/reports/2024-trafficking-in-persons-report/ghana/>

<sup>xiii</sup> Submission to Call for Inputs on Human Rights Council Resolution 52/25: study on universal birth registration and the use of digital technologies (CSC, August 2024). See: <https://www.streetchildren.org/wp-content/uploads/2024/08/CSC-Birth-Registration-and-the-Use-of-Digital-Technologies.pdf>

<sup>xiv</sup> Five-Year Strategic Plan for Street-Connected Children and Young Persons (2024–2028), p15

<sup>xv</sup> <https://www.streetchildren.org/resources/general-comment-no-21-2017-on-children-in-street-situations/>

<sup>xvi</sup> <https://endviolenceagainstchildrenconference.org/wp-content/uploads/2024/11/Ghana-pledge.pdf>

<sup>xvii</sup> <https://docs.un.org/en/CRC/C/GC/21 para 14>, p6

<sup>xviii</sup> [https://lawsghana.com/pre\\_1992\\_legislation/NLC%20Decree/BEGGARS%20AND%20DESTITUTES%20ACT,%201969%20\(NLCD%20392\)/187](https://lawsghana.com/pre_1992_legislation/NLC%20Decree/BEGGARS%20AND%20DESTITUTES%20ACT,%201969%20(NLCD%20392)/187)

<sup>xix</sup> <https://www.unicef.org/ghana/media/1891/file/SOP%20-%20Child-Friendly%20Policing.pdf>

<sup>xx</sup> [https://documents.un.org/symbol-explorer?s=A/80/113&i=A/80/113\\_1754322193044](https://documents.un.org/symbol-explorer?s=A/80/113&i=A/80/113_1754322193044)

<sup>xxi</sup> <https://www2.ohchr.org/english/bodies/crc/docs/advanceversions/crc-c-gc-12.pdf>

<sup>xxii</sup> Five-Year Strategic Plan for Street-Connected Children and Young Persons (2024–2028), p9

<sup>xxiii</sup> <https://www.streetchildren.org/wp-content/uploads/2025/01/Resource-pack-2025-edits.pdf>