Joint Alternative Report on the Human Rights Situation of Children with Albinism in Tanzania Submitted to the Committee on the Rights of the Child (CRC Committee)

Ву



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Introduction

Children with albinism in Tanzania face significant human rights violations, including discrimination, social exclusion, violence, and inadequate access to essential services such as education and healthcare. Despite Tanzania's legal commitments under the Convention on the Rights of the Child (CRC), children with albinism continue to experience systemic challenges that hinder their full participation in society. Harmful traditional beliefs and myths exacerbate their vulnerability, leading to cases of abduction, ritual killings, and abandonment.

It is worthy of note to state that after nearly seven years of persistent advocacy by albinism groups and civil society organizations, Tanzania has made history by adopting its first-ever National Action Plan (NAP) on Albinism. The document was officially signed on December 3, 2024, during the International Day of Persons with Disabilities, representing a major stride towards securing the rights and well-being of persons with albinism in Tanzania. However, this crucial policy document is not available to the public as at March 2025, three months after its adoption by the government.

Tanzania signed the United Nations Convention on the Rights of Persons with Disabilities (CRPD) on March 30, 2007, and ratified it on November 10, 2009. The country also signed the Optional Protocol to the CRPD on September 29, 2008, and ratified it on November 10, 2009. However, Tanzania has not submitted its initial state party report to the CRPD Committee for review since 2011.²

This alternative report, submitted by the Africa Albinism Network (AAN) and the Tanzania Albinism Society (TAS), provides a comprehensive assessment of the human rights situation of children with albinism in Tanzania. The report examines Tanzania's compliance with key provisions of the CRC and highlights critical gaps in legal protections, policy implementation, and enforcement mechanisms. Additionally, it offers recommendations aimed at ensuring the effective protection and inclusion of children with albinism in all aspects of society.

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¹ United Republic of Tanzania, National Action Plan for Persons with albinism 2023/2024 – 2027/2028

² https://www.rodra.co.za/tanzania

Executive Summary

This report analyzes Tanzania's implementation of the CRC concerning the rights of children with albinism. Although Tanzania has enacted laws to promote equality and non-discrimination, these laws fail to specifically address the unique vulnerabilities of children with albinism. As a result, they continue to face discrimination in education, healthcare, and social participation.

Key issues identified in this report include:

- Non-Discrimination (Article 2) Despite constitutional guarantees, children with albinism face systemic discrimination, particularly in education and healthcare. There is a lack of reasonable accommodations in schools and inadequate access to essential medical services such as dermatological and vision care.
- Best Interests of the Child (Article 3) Many children with albinism are institutionalized rather than supported within their families due to safety concerns. The government has not developed community-based protection mechanisms to integrate these children into society while ensuring their safety.
- Right to Life, Survival, and Development (Articles 6 and 19) The persistent threat of ritual killings and abductions remains a major concern. Despite some government efforts, law enforcement responses have been slow and ineffective, leading to continued impunity for perpetrators.
- Family Environment and Alternative Care (Article 20) Due to widespread stigma, many children with albinism are abandoned or placed in shelters rather than family-based care systems, which contradicts international child protection standards.
- 5. **Rights of Children with Disabilities (Article 23)** While Tanzania has adopted laws to protect persons with disabilities, they do not sufficiently address the

unique challenges faced by children with albinism, such as the need for assistive learning devices and sun protection materials.

- 6. **Right to Health (Article 24)** Tanzania's healthcare system does not adequately cater to the medical needs of children with albinism. Essential health provisions such as sunscreen and vision care are either unavailable or unaffordable, leading to preventable health complications, including skin cancer.
- 7. **Right to Education (Articles 28 & 29)** Many children with albinism face barriers to quality education due to lack of specialized learning materials, teacher training, and safety concerns. High dropout rates among children with albinism reflect the inadequacy of inclusive education policies.
- 8. Protection from Harmful Practices and Trafficking (Articles 34, 35, 36, and 39) Harmful traditional practices, including the trafficking of children with albinism for ritual purposes, persist due to weak enforcement of child protection laws and deeply ingrained cultural beliefs.

The report presents detailed recommendations, including legal reforms, policy implementation, and awareness campaigns, to ensure that Tanzania fully complies with its obligations under the CRC and protects the rights of children with albinism.

Article 2: Non-Discrimination

The principle of non-discrimination is a core provision of the CRC, obligating State Parties to ensure that all children, regardless of their status, enjoy their rights without discrimination. Tanzania has ratified the CRC and has incorporated non-discrimination provisions into its legal framework. The Constitution of Tanzania, under Article 13, guarantees equality before the law and prohibits discrimination based on various grounds.³ However, the constitution failed to explicitly state disability as one of the grounds for non-discrimination unless it is read into under article 13(5) which is confusing and lacks clarity.

³ The Constitution of the United Republic of Tanzania, 1977, Article 13

Additionally, the Disability Act prohibits discrimination against persons with disabilities in education,⁴ employment,⁵ and healthcare,⁶ while the Children's Act provides general protections for children,⁷ including those with disabilities. However, these laws do not explicitly address the specific vulnerabilities of children with albinism, leading to gaps in enforcement and protection considering the severity of human rights violations faced by persons with albinism including children.

Despite Tanzania's legal commitments, children with albinism continue to face systemic discrimination in multiple areas of life. In the education sector, many children with albinism encounter barriers to learning, including the lack of reasonable accommodations such as assistive devices, large-print materials, and protection from harmful UV exposure. The Education Act and the Inclusive Education Policy recognize the rights of children with disabilities to education, but they fail to include specific provisions addressing the needs of children with albinism. This exclusion contributes to lower enrollment rates and poor educational outcomes for children with albinism.

In the healthcare sector, children with albinism face inadequate access to essential medical services, particularly in dermatological care and vision support. Many healthcare facilities lack essential services tailored to their needs, such as access to sunscreen and skin cancer treatment. Although the Health Act and related policies ensure healthcare access for all, they do not mandate the specific inclusion of children with albinism, leaving them vulnerable to preventable health conditions. This oversight results in a lack of prioritization for the medical needs of children with albinism within Tanzania's healthcare policies and programs.

⁴ The Persons with Disabilities Act of Tanzania, 2010, Section 28

⁵ As above, Section 31

⁶ As above, Section 26

⁷ The Law of the Child Act, 2009,

⁸ Mdomondo E, Educating children with albinism in Tanzanian regular secondary schools: challenges and opportunities, International Journal of Education and Research, 2015. Available chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://www.ijern.com/journal/2015/June-2015/32.pdf?utm_source=chatgpt.com.

⁹ The Persons with Disabilities Act of Tanzania, 2010, Section 27

¹⁰ Report of the 43rd Session of the African Committee of Expert on the Rights and Welfare of the Child (ACERWC), April 2024

Report of the Independent Expert on the enjoyment of human rights by persons with albinism on her mission to the United Republic of Tanzania

Beyond education and healthcare, social exclusion and violence against children with albinism remain significant concerns. Harmful myths and cultural beliefs contribute to the marginalization of children with albinism, increasing their risk of abduction, trafficking, and ritual killings. The African Court on Human and Peoples' Rights recently ruled that Tanzania has failed to adequately protect persons with albinism from such attacks. The absence of targeted legal protections within the Disability Act and other frameworks exacerbates this vulnerability. The failure to provide specific safeguards against violence means that many children with albinism live in fear and isolation, often forced into institutional care for their safety rather than being integrated into their communities.¹²

While Tanzania has made legislative efforts to prohibit discrimination, the current legal framework lacks explicit recognition of children with albinism as a distinct group requiring specific protections within anti-discrimination laws. Furthermore, clear enforcement mechanisms are needed to ensure compliance with non-discrimination provisions. The government must also establish comprehensive policy frameworks that mandate reasonable accommodations in education and healthcare tailored to children with albinism. Without these necessary legal and policy reforms, Tanzania will continue to fall short of its obligations under Article 2 of the CRC.

Proposed Recommendations

- 1. Amend the Education Act to Ensure Reasonable Accommodations for Children with Albinism: The Education Act should be amended to explicitly mandate reasonable accommodations for children with albinism, ensuring their right to equal access to quality education. Section 4 of the Education Act should be revised to include provisions requiring the provision of assistive devices such as magnifiers, large-print books, protective clothing, and sunscreen in schools.
- Amend the Health Act to Provide Free or Subsidized Dermatological and Vision Care: Tanzania's Public Health Act (2009) does not currently mandate specific healthcare provisions for children with albinism, leaving them vulnerable

¹² African Court on Human and Peoples Rights, center for human rights and others v. United republic of tanzania application no. 019/2018 judgment on merits and reparations 5 february 2025.

to preventable health conditions. A new provision should be introduced requiring the government to provide free or subsidized dermatological care, vision support, and sunscreen for children with albinism.

3. Strengthen Legal Protections Against Attacks on Children with Albinism: Tanzania's Children's Act should be amended to include stronger legal protections against violence, ritual killings, and abductions targeting children with albinism. Specifically, Part VI (Protection of Children), Section 94 should be revised to recognize children with albinism as a vulnerable group requiring special protection, with strict penalties for those involved in violence against them. This amendment is critical, considering the African Court on Human and Peoples' Rights ruling, which found that Tanzania has failed to adequately protect persons with albinism.

4. Integrate Albinism-Specific Provisions into the National Inclusive Education Policy:

The Inclusive Education Policy should be revised to include albinism-specific provisions, particularly under Strategy 2, which addresses learning accommodations for children with disabilities. The amendment should require mandatory teacher training on albinism-related needs, including low-vision support, proper classroom seating arrangements, and sun protection measures.

Article 3: Best Interests of the Child

The best interests of the child is a fundamental principle under Article 3 of the CRC, requiring that in all actions concerning children, whether undertaken by public or private institutions, courts of law, administrative authorities, or legislative bodies, the child's best interests shall be a primary consideration. While Tanzanian laws recognize this principle, children with albinism are often neglected in its implementation, leaving them vulnerable to abuse, exclusion, and institutionalization.

The Tanzanian legal framework does not fully integrate the best interests principle across all relevant legislation. The Constitution lacks an explicit provision requiring that the best interests of the child be a primary consideration in all actions concerning them.

This omission weakens the legal mandate to ensure that all policies and decisions affecting children are made in their best interests. The Disability Act, particularly Sections 7, 8, and 9, aligns with the best interests principle in a broad sense but lacks explicit child-focused provisions. The Act does not provide specific references to the best interests of children with disabilities in legal proceedings, care services, or policy implementation. As a result, children with albinism are often overlooked in the design and application of social protection mechanisms.

The lack of explicit legal protections tailored to children with albinism has led to severe consequences. Many children with albinism face rejection from their families and communities due to harmful myths and superstitions, resulting in forced institutionalization. Reports indicate that children with albinism are often placed in segregated shelters, ostensibly for their protection, but such placements contradict the best interests principle by depriving them of family and community life. The CRC Committee has repeatedly emphasized that institutionalization should be a last resort, yet in Tanzania, the absence of alternative community-based protection mechanisms has led to its overuse. The community of the comm

Moreover, the failure to prioritize the best interests of children with albinism is evident in the inadequate enforcement of laws against violence and trafficking. The African Court on Human and Peoples' Rights, in its 2025 judgment, underscored Tanzania's failure to provide effective protection against ritual killings and abductions of persons with albinism. The government's response has often focused on punitive measures rather than preventive strategies that ensure the safety and well-being of children with albinism within their communities.

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application no. 019/2018 judgment on merits and reparations 5 February 2025.

 $[\]frac{13}{https://news.un.org/en/story/2017/07/562442-tanzania-attacks-persons-albinism-decline-local-attitudes-must-change-un-expert?utm source=chatgpt.com$

¹⁴ Concluding observations on the combined third to fifth periodic reports of the United Republic of Tanzania ¹⁵ African Court on Human and Peoples Rights, center for human rights and others v. United republic of tanzania

Proposed Recommendations

- 1. Facilitate family-based care for children whenever possible and provide support to extended family networks and other community members who care for children deprived of their family environment and to child-headed households, with a view to reducing the institutionalization of children.¹⁶
- Conduct a national audit of shelters including privately own shelters, housing children with albinism and develop a transition plan to reintegrate them into family and community environments.
- 3. Revise the Disability Act to include explicit child-focused provisions, ensuring that the best interests of children with disabilities, including albinism, are central to legal proceedings, care services, and policy implementation.

Articles 6 and 19: Right to Life, Survival, and Development and Violence Against Children

The right to life, survival, and development is a fundamental principle under Article 6 of the Convention on the Rights of the Child (CRC), requiring States to ensure that every child has the inherent right to life and to take necessary measures to guarantee their survival and development. Similarly, Article 19 obligates States to take all appropriate legislative, administrative, social, and educational measures to protect children from all forms of violence, abuse, neglect, and exploitation. Despite these obligations, children with albinism in Tanzania remain at severe risk due to continued attacks, killings, and mutilations driven by harmful beliefs in witchcraft.¹⁷

While Tanzania's Constitution guarantees the right to life under Article 14¹⁸ and the right to dignity under Article 12¹⁹, it does not explicitly address the survival and development

 $^{^{16}}$ Concluding observations on the combined third to fifth periodic reports of the United Republic of Tanzania

¹⁷ https://www.researchgate.net/publication/335440203 Human rights violations of persons with albinism in Tanzania The case of children in temporary holding shelters?utm source=chatgpt.com or https://www.scielo.org.za/scielo.php?pid=S1727-

^{37812020000100041&}amp;script=sci arttext&utm source=chatgpt.com

¹⁸ Article 14 states "Every person has the right to live and to the protection of his life by the society in accordance with the law."

of children or protection from violence. This legal gap weakens the overall framework meant to safeguard children, particularly those at heightened risk, such as children with albinism. The lack of targeted interventions and enforcement mechanisms further exacerbates the crisis, allowing impunity to persist despite national and international condemnation.

As of June 2024, Tanzania reported 209 cases of killings and attacks against people with albinism, according to Under the Same Sun. 20 Although reported attacks declined between 2018 and 2019, with only two cases recorded in the first half of 2019, violence has persisted. Between January 2019 and December 2023, incidents were reported in Mwanza and Arusha, and more recently, two brutal attacks against children with albinism were reported in May 2024.

On May 30, a two-and-a-half-year-old girl was abducted in Kagera Region after her mother was strangled by two assailants. The child's mutilated body was found 18 days later in a water-filled culvert, missing its hands, tongue, and eyes.²¹ Nine suspects, including the father, a traditional healer, and a priest, were arrested for allegedly attempting to sell the child's body parts. Earlier, on May 4, a 10-year-old boy with albinism was attacked with machetes while fetching water in Geita Region, sustaining severe injuries to his face and arm. The assailant fled after neighbors intervened, leaving behind weapons.²²

Despite some government interventions, including the recent adoption of the National Action Plan on Albinism in December 2024, enforcement gaps persist. The African Court on Human and Peoples' Rights, in its 2025 judgment, underscored Tanzania's

¹⁹ Article 12 states "(1) All human beings are born free, and are all equal. (2) Every person is entitled to recognition and respect for his dignity."

https://www.underthesamesun.com/wp-content/uploads/2024/09/Attacks-of-PWA-2-page 02.09.2024.pdf

²¹ https://www.thecitizen.co.tz/tanzania/news/national/tanzania-outlines-measures-to-protect-people-with-<u>albinism-4664394?utm_source=chatgpt.com</u>
²² As above.

failure to provide effective protection against these crimes. Law enforcement responses remain slow and ineffective, leading to continued impunity for perpetrators.²³

Sections 6, 41, and 42 of the Disability Act recognize the rights of persons with disabilities to security and protection from harm. However, the law does not specifically address the targeted violence and ritual killings affecting children with albinism, limiting its effectiveness in providing necessary protections. The absence of comprehensive community-based protection mechanisms has resulted in the overuse of institutionalization as a response to threats, depriving children with albinism of family and community life.²⁴

Proposed Recommendations

- Fully implement and fund the National Action Plan on Albinism: Allocate sufficient resources to ensure effective implementation. Establish a monitoring and evaluation mechanism to assess progress and address gaps in enforcement. Increase public awareness campaigns to dismantle harmful superstitions driving attacks.
- 2. Strengthen community policing and intelligence-led security responses: Expand specialized community policing units to proactively prevent attacks and provide rapid response to threats. Establish local intelligence networks to track and dismantle criminal networks involved in the trafficking of body parts. Strengthen police-community collaboration to encourage the reporting of suspicious activities related to albinism-related violence.
- 3. Ensure swift and stringent prosecution of perpetrators to deter future crimes: Expedite investigations and trials of individuals involved in attacks and killings of children with albinism. Enforce harsher penalties, including life

https://archive.crin.org/en/library/news-archive/tanzania-un-criticises-government-segregating-childrenalbinism.html?utm_source=chatgpt.com

²³ African Court on Human and Peoples Rights, center for human rights and others v. United republic of tanzania application no. 019/2018 judgment on merits and reparations 5 February 2025.

imprisonment, for those convicted of ritual killings and attacks. Train law enforcement and judicial officers on handling cases involving persons with albinism sensitively and effectively.

- 4. Amend the Disability Act to explicitly criminalize attacks against children with albinism and introduce specific protection measures: Introduce legal provisions that classify attacks against persons with albinism as hate crimes with severe penalties. Establish a dedicated fund for the care, rehabilitation, and legal support of survivors of attacks. Provide legal aid and psychological support services for victims and their families.
- 5. Develop and implement alternative community-based protection mechanisms: Establish foster care and family reintegration programs to prevent unnecessary institutionalization. Ensure that shelters for children with albinism are temporary solutions, prioritizing reintegration into safe family environments. Support local organizations and communities in providing safe spaces and protective environments for at-risk children.

Article 20: Family Environment and Alternative Care

Children with albinism in Tanzania frequently experience abandonment or institutionalization due to stigma and safety concerns.²⁵ Many families reject their children with albinism because of deep-seated myths, discrimination, and fear, leaving them without the necessary parental care and emotional support.²⁶ The lack of targeted legal protections and support systems further exacerbates their vulnerability, leading to inadequate care arrangements and social exclusion.

Section 18 and 19 of the Law of the Child Act provides for the care and protection of children deprived of family care, aligning with the principles of the CRC. However, it does not specifically mention children with albinism, despite the unique challenges they

²⁵ Report of the Independent Expert on the enjoyment of human rights by persons with albinism on her mission to the United Republic of Tanzania

Reimer-Kirkham, S., Astle, B., Ero, I. *et al.* Mothering, Albinism and Human Rights: The Disproportionate Impact of Health-Related Stigma in Tanzania. *Found Sci* **27**, 719–740 (2022). https://doi.org/10.1007/s10699-020-09701-0

face. Many of these children are placed in institutional care facilities, which are often underfunded and ill-equipped to meet their specific health, educational, and psychosocial needs.²⁷ Although the government-run shelter has since been converted into boarding schools, privately owned shelters continue to operate with limited government supervision. This undermines their right to a nurturing and protective family environment and contravenes global best practices that prioritize family-based care over institutionalization.

The Independent Expert on Albinism has documented the severe challenges faced by children with albinism in enjoying their right to family life. Societal stigma, discrimination, and misconceptions about albinism frequently result in family abandonment.²⁸ Parents who keep their children with albinism often face community pressure, economic hardship, and social isolation, leading them to give up their children to state care.²⁹ However, due to a lack of strong reintegration programs and family-support services, many of these children remain in institutions instead of being placed in family-based alternative care. This is contrary to global best practices in child welfare, which emphasize deinstitutionalization and the promotion of foster and kinship care.

The failure to provide adequate family support services, community awareness programs, and foster care alternatives places Tanzania in violation of its obligations under the CRC. The absence of targeted legal and policy interventions to prevent the unnecessary institutionalization of children with albinism highlights a significant gap in the child protection system. These children require specialized support to remain with their families or be placed in family-based alternative care settings that promote their well-being and development.

²⁷ Masaka, M.B. (2017) Provision of psychosocial support for trafficked children under institutional care in Dar es Salaam region. Master dissertation, University of Dar es Salaam. Dar es Sala

²⁸ Report of the Independent Expert on the enjoyment of human rights by persons with albinism on her mission to the United Republic of Tanzania

²⁹ As above

Proposed Recommendations

- Tanzania should strengthen family-based care and reintegration programs by expanding national guidelines on child reintegration, providing direct financial assistance to families raising children with albinism, and enhancing communitybased foster and kinship care systems.
- 2. The legal and policy framework for alternative care should be improved by amending the Law of the Child Act to include specific protections for children with albinism, developing a National Alternative Care Strategy that prioritizes family-based care, and ensuring strict enforcement of regulations governing children's homes.
- 3. Monitoring and oversight of alternative care institutions should be strengthened by establishing an independent oversight mechanism, developing a confidential reporting system for children with albinism in care, and training social welfare officers and caregivers on their specific needs.
- 4. Targeted awareness and social protection programs should be implemented, including community sensitization to combat stigma, parenting education and psychosocial support for families, and school-based programs to ensure children with albinism have access to education without being institutionalized.
- 5. Economic support for families should be enhanced by expanding social safety net programs to provide financial assistance to families caring for children with albinism and promoting vocational training and income-generating activities for caregivers.

Article 23: Rights of Children with Disabilities

Children with albinism in Tanzania face multiple barriers in accessing education, healthcare, and social services, despite being recognized under disability laws. Discriminatory attitudes, lack of reasonable accommodations, and inadequate policy implementation continue to hinder their full participation in society. While Tanzania has

made legislative commitments to protect the rights of persons with disabilities, these measures often fall short of addressing the unique challenges faced by children with albinism.

The Constitution of Tanzania provides for non-discrimination; however, it does not explicitly mention children with disabilities non does it state disability as one of the grounds for discrimination. This absence of a constitutional guarantee of special protection and support for children with disabilities weakens their legal standing and limits enforcement mechanisms. Without explicit constitutional recognition, the rights of children with disabilities, including those with albinism, remain inadequately safeguarded.

The Disability Act acknowledges the rights of persons with disabilities, including provisions on accessibility, education, and healthcare. However, it does not contain specific measures tailored to the needs of children with albinism, such as the provision of assistive devices, accessible learning materials, and UV protection.³⁰ The lack of targeted interventions results in widespread exclusion and inadequate support in critical areas such as education and healthcare.

In the education sector, children with albinism face persistent challenges, including limited access to reasonable accommodations, such as large-print books, low-vision aids, and protective school environments.³¹ Many schools lack the resources to provide inclusive education, and teachers are often not trained to support students with albinism effectively.³² Consequently, many children with albinism experience high dropout rates and lower educational attainment compared to their peers.³³

Healthcare services also remain inaccessible for many children with albinism. Essential services such as dermatological care, sunscreen distribution, and vision support are

³⁰ ADRA, Persons with Albinism, Situational Analysis

³¹ Report of the Independent Expert on the enjoyment of human rights by persons with albinism on her mission to the United Republic of Tanzania

³² As above

³³ ADRA, Persons with Albinism, Situational Analysis

either unavailable or inconsistently provided.³⁴ Although Tanzania has policies to promote healthcare access for persons with disabilities, these policies do not mandate specific provisions for children with albinism, leaving them vulnerable to preventable health conditions, including skin cancer and severe visual impairment.

Proposed Recommendations

 Strengthen the implementation of laws and policies relating to children with disabilities, particularly children with albinism including the implementation of the National Action Plan on Albinism Adopted on December 3 2024. We also encourage the government to allocate enough funding resources and human resources to effectively implement the National Action Plan on Albinism.

Article 24: Right to Health

Tanzania's compliance with Article 24 of the CRC remains inadequate, particularly concerning the right to health for children with albinism. Despite policy commitments, significant legal and structural gaps hinder access to essential healthcare services for this vulnerable group. The Constitution of Tanzania recognizes the right to health under national policies but does not explicitly guarantee it as a legally enforceable right, especially for children with disabilities, including those with albinism. This omission limits access to essential health services and perpetuates discrimination, violating the principles of the CRC. Article 26 of the Persons with Disabilities Act emphasizes universal access to healthcare for persons with disabilities but lacks explicit provisions ensuring non-discriminatory access for children with albinism, who frequently face stigma and misconceptions in medical settings.

Similarly, the Public Health Act promotes access to essential healthcare services but fails to address the specific needs of children with albinism, such as dermatological care, vision care, and sun protection materials. Given their heightened vulnerability to skin cancer and severe visual impairments, Furthermore, Tanzania's Essential

³⁴ ADRA, Persons with Albinism, Situational Analysis

Medicines List does not include sunscreen, despite its necessity in preventing lifethreatening skin conditions for children with albinism.

The Law of the Child Act recognizes the right to health and medical services but does not specifically address the unique healthcare needs of children with albinism. Likewise, the National Health Insurance Fund Act provides coverage for basic health services but excludes specialized care essential for children with albinism. Given that many families struggle to afford necessary medical interventions. According to research conducted by ADRA in 2021, persons with albinism in the Morogoro region of Tanzania receive only 10% of the total amount of sunscreen they need annually. The same research also revealed that a 60g bottle of sunscreen costs approximately USD 15, making it difficult for families of children with albinism to afford.³⁵

In addition to legal gaps, systemic barriers further obstruct access to healthcare for children with albinism. Although healthcare policies promote capacity-building for healthcare providers as indicated in the state party report, there is no mandatory training on the medical and psychosocial needs of children with albinism. Moreover, while policies support community health initiatives, targeted outreach programs for children with albinism, particularly in rural areas, remain absent.

It is worthy of note to state that the State Party report of the United Republic of Tanzania failed to provide any information on interventions it has carried out to safeguard the health rights of children with albinism. This omission highlights a critical gap in the government's commitment to ensuring equitable healthcare access for children with albinism, particularly in addressing their urgent dermatological and vision-related needs. The lack of targeted policies and concrete actions further exacerbates their vulnerability to preventable conditions such as skin cancer and severe visual impairments. Without dedicated interventions, these children remain at a heightened risk of exclusion from essential healthcare services, reinforcing systemic discrimination and neglect.

³⁵ ADRA, Persons with Albinism, Situational Analysis

Proposed Recommendations

- 1. The government should include sunscreen in the Essential Medicines List and ensure its nationwide availability. Sunscreen should be officially classified as an essential medicine under national health policies, guaranteeing its presence in all public health facilities. To make sunscreen more affordable and accessible, the government should establish local production and distribution mechanisms, such as expanding the KiliSun initiative, to reduce dependency on imports and lower costs. Additionally, sunscreen should be integrated into universal health coverage programs, making it freely available to children with albinism in both urban and rural areas.
- 2. It is also essential to provide free or subsidized protective care for children with albinism. This should include a national subsidy program for essential protective items such as UV-protective clothing, sunglasses, wide-brimmed hats, and assistive devices that help reduce sun exposure and prevent skin damage. The government should ensure that children with albinism have access to free and regular dermatological check-ups and early detection programs for skin cancer at government hospitals and clinics. Furthermore, school-based healthcare programs should be expanded to include routine vision assessments, skin screenings, and access to protective resources to ensure children with albinism receive the necessary support in educational settings.
- 3. Healthcare providers must be adequately trained on albinism-related conditions and inclusive healthcare practices. Medical and nursing curricula should include albinism-specific training, focusing on dermatological care, low-vision support, and psychosocial counseling. Additionally, the government should conduct regular capacity-building workshops for community health workers, nurses, and dermatologists, equipping them with the knowledge and skills to provide specialized care for persons with albinism. To standardize care across all healthcare facilities, the Ministry of Health should develop clinical guidelines for the diagnosis, treatment, and long-term management of albinism-related conditions.

Articles 28 & 29: Right to Education

Children with albinism in Tanzanian schools face a multitude of challenges that severely impede their right to education. Bullying and exclusion are rampant, often stemming from deeply ingrained societal stigma and misconceptions about albinism. They are frequently subjected to verbal abuse, physical harassment, and social isolation by their peers, and sometimes even by teachers.³⁶ This creates a hostile learning environment that undermines their self-esteem and motivation. Furthermore, a critical lack of appropriate learning materials and accommodations for their visual impairments hinders their ability to fully participate in the curriculum.³⁷ Standard textbooks and teaching methods are often unsuitable for students with low vision, and assistive technologies are rarely available.³⁸ The absence of trained teachers who understand the specific needs of children with albinism exacerbates these challenges. Consequently, many children with albinism struggle to keep up with their studies, leading to poor academic performance and high dropout rates.³⁹

The Tanzanian education system's inclusivity in accommodating children with albinism remains significantly inadequate. While there are policies that promote inclusive education, their implementation is inconsistent and often falls short. Many public schools lack the resources, infrastructure, and trained personnel necessary to effectively support students with albinism. There is a need for more teacher training on inclusive practices and albinism related visual impairment, and for more resources to be allocated towards providing accessible learning materials and assistive technologies. While some efforts are being made to raise awareness and promote inclusivity, a more comprehensive and sustained approach is needed to ensure that all children with albinism in the country have equal access to quality education. This necessitates a

³⁶ https://www.hrw.org/news/2019/02/09/it-felt-punishment-growing-albinism-tanzania?utm_source=chatgpt.com

³⁷ ADRA, Persons with Albinism, Situational Analysis

³⁸ Report of the Independent Expert on the enjoyment of human rights by persons with albinism on her mission to the United Republic of Tanzania

³⁹ ADRA, Persons with Albinism, Situational Analysis

⁴⁰ Report of the Independent Expert on the enjoyment of human rights by persons with albinism on her mission to the United Republic of Tanzania

fundamental shift in attitudes and practices within the education system, coupled with increased investment in resources and training.

The Education Act and the National Strategy for Inclusive Education emphasize the right of every child to education without discrimination. However, the Education Act does not explicitly mention children with albinism, who frequently face stigma, safety threats, and systemic discrimination in schools. These challenges often lead to increased dropout rates among children with albinism with only 10 percent progressing to secondary school. Both the Education Act and the Inclusive Education Policy promote equal access to education for all children, including those with disabilities. However, the Act does not guarantee specialized learning materials and reasonable accommodations for children with albinism, such as low-vision aids, magnifiers, and large-print books. The National Strategy for Inclusive Education acknowledges the need to review and update guidelines on the education of children with albinism to address these gaps.

Despite provisions emphasizing a safe learning environment, children with albinism remain at high risk of abduction and attacks due to harmful superstitions. Many children are placed in government boarding schools and privately own shelters instead of being supported within their communities, which can hinder their educational and social development. The Inclusive Education Policy promotes teacher training on inclusive education. However, the Education Act does not mandate specialized training for teachers on the needs of children with albinism, such as low vision support, proper seating arrangements, and sun protection. This lack of training result in inadequate support for these students, affecting their academic performance and overall school experience.

⁴¹ https://www.thecitizen.co.tz/tanzania/magazines/success/-education-struggles-of-children-with-albinism-2663770?utm_source=chatgpt.com

⁴² Report of the Independent Expert on the enjoyment of human rights by persons with albinism on her mission to the United Republic of Tanzania

⁴³ United Republic of Tanzania, Ministry of Education Science and Technology, National Strategy for Inclusive Education, 2018 - 2021

⁴⁴ https://www.hrw.org/news/2019/02/09/it-felt-punishment-growing-albinism-tanzania?utm_source=chatgpt.com

The Education Act and the Inclusive Education Policy recognize the need for assistive devices for children with disabilities. However, there is no specific requirement for schools to provide essential materials for children with albinism, such as sunscreen, protective clothing, and prescription eyewear. This oversight led to health issues and further marginalization of these students.⁴⁵

Proposed Recommendations

- 1. The National Strategy on Inclusive Education should be reviewed, updated, and fully implemented, given that the existing strategy expired in 2021. The revised strategy must incorporate specific provisions addressing the unique needs of children with albinism, including reasonable accommodations, teacher training, and specialized resources. The government should allocate dedicated funding for its implementation and establish a monitoring mechanism to assess progress and effectiveness.
- 2. The government must ensure the provision of specialized learning materials and assistive devices to enhance the educational experience of children with albinism. This includes large-print books, magnifiers, high-contrast writing materials, monoculars, and other low-vision aids to address their visual impairments. Additionally, protective materials such as sunscreen, sunglasses, and wide-brimmed hats should be made available in schools to prevent UV-related health complications. Schools should be mandated to integrate these resources as part of the inclusive education framework, ensuring they are readily accessible to students in need.
- 3. Teacher training programs should be redesigned and standardized to equip educators with the necessary skills to effectively support children with albinism. Training modules should focus on low-vision support techniques, proper classroom seating arrangements, sun protection measures, and inclusive teaching methodologies. The Ministry of Education should collaborate with

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⁴⁵ https://www.hrw.org/news/2019/02/09/it-felt-punishment-growing-albinism-tanzania?utm_source=chatgpt.com

teacher training institutions and disability rights organizations to incorporate these specialized training components into the national teacher education curriculum.

Articles 34, 35, 36 and 39: Protection from Harmful Practices and Trafficking and Special Protection Measures

Traditional practices and trafficking continue to pose significant threats to children with albinism in Tanzania. Harmful cultural beliefs surrounding albinism have led to cases of abduction, trafficking, and ritual killings, exposing these children to extreme violence and exploitation. The Constitution of Tanzania condemns exploitation and upholds the dignity of all persons, but it does not explicitly address child trafficking, child labor, or harmful cultural practices such as child marriage and female genital mutilation. This omission weakens legal protection against exploitative practices affecting children with albinism.

Tanzania has adopted laws against human trafficking, including the Anti-Trafficking in Persons Act, but enforcement remains inconsistent. While this law provides a framework for combating trafficking, it lacks explicit provisions that recognize and address the specific vulnerabilities of children with albinism. Similarly, child protection laws, such as the Law of the Child Act, do not contain targeted measures to combat harmful traditional practices that threaten the safety of children with albinism.

Despite government interventions, such as the National Action Plan on Albinism endorsed in December 2024, enforcement gaps persist, leaving children with albinism vulnerable to ritual attacks and trafficking. Law enforcement agencies often fail to investigate or prosecute perpetrators effectively, leading to impunity for those who engage in such crimes. Many families of affected children lack access to justice, and fear of retaliation discourages them from reporting cases. Additionally, harmful traditional beliefs continue to fuel demand for body parts of persons with albinism,

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⁴⁷ As above

leading to increased risks for children. 48 Awareness campaigns have been but they have not been sufficient to eradicate implemented, deep-rooted misconceptions that drive such harmful practices.

The Constitution of Tanzania enshrines general human rights and anti-discrimination principles, but it does not specifically mention children with disabilities or those facing particular forms of violence, such as ritual killings targeting children with albinism. 49 This omission allows for systemic gaps in protection and has contributed to continued human rights violations against this vulnerable group. The recent African Court on Human and Peoples' Rights ruling reaffirmed that the Tanzanian government has failed in its obligation to protect children with albinism from human rights abuses, underscoring the urgent need for legal reform.⁵⁰

Despite the existence of the Law of the Child Act, which outlines general protections for children, there are no explicit provisions recognizing children with albinism as requiring special protection. Reports from the United Nations Independent Expert on the Enjoyment of Human Rights by Persons with Albinism indicate that Tanzanian children with albinism are frequently subjected to abductions, ritual attacks, and mutilations, often leaving them permanently disabled and socially marginalized.51 The Anti-Trafficking in Persons Act of Tanzania criminalizes human trafficking, but law enforcement agencies struggle with enforcing protections for children with albinism due to ineffective investigation procedures and weak judicial enforcement mechanisms. The African Court, in its 2025 ruling, further condemned the government's failure to prevent and prosecute cases of abduction and killings of children with albinism, citing systemic barriers that hinder access to justice for victims and their families.

Another significant concern is the lack of comprehensive recovery, reintegration, and rehabilitation services for children with albinism who are victims of violence, mutilation,

⁴⁹ Constitution of Tanzania, Articles 12–14

⁴⁸ https://www.the-indepen<u>dent.com/life-style/health-and-families/witchcraft-albino-trade-body-part-human-</u> rights-un-subsaharan-african-a7958946.html

⁵⁰ African Court on Human and Peoples Rights, center for human rights and others v. United republic of tanzania application no. 019/2018 judgment on merits and reparations 5 February 2025.

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and societal exclusion. The CRC (Article 39) and the ACRWC (Article 16) both mandate state parties to ensure that child victims receive appropriate support to promote their physical and psychological recovery and social reintegration. However, in Tanzania, survivors of attacks are often placed in government or privately own shelters that lack proper care, education, and family reintegration services.

Proposed Recommendations

- 1. The government, in collaboration with traditional leaders, religious institutions, civil society organizations, and media outlets, should implement sustained public awareness campaigns to dispel harmful myths surrounding albinism. These campaigns should utilize radio, television, social media, and community dialogues to educate the public on the rights and dignity of persons with albinism. Sensitization programs should also be integrated into school curricula to foster inclusion and acceptance from an early age. Furthermore, peer education initiatives should be launched in schools and communities to engage young people in promoting social inclusion and reducing discrimination.
- 2. Children with albinism who have survived trafficking, ritual attacks, or social exclusion require long-term, specialized care. The government should establish child protection units within law enforcement and social welfare services that specifically cater to the needs of children with albinism. These units should provide legal aid, counseling, and case management services for survivors and their families. Additionally, specialized education and vocational training programs should be developed to empower affected children and support their reintegration into society.

Conclusion

Despite Tanzania's legal commitments to child rights and disability inclusion, children with albinism continue to face significant human rights violations. The persistence of discrimination, violence, and lack of access to essential services highlights the urgent need for targeted legal and policy interventions. While some progress has been made

through legislative measures, enforcement remains weak, and key gaps continue to undermine the full realization of the rights of children with albinism.

To address these challenges, Tanzania must take decisive action, including amending existing laws to explicitly protect children with albinism, strengthening enforcement mechanisms, and implementing inclusive policies in education and healthcare. Additionally, there is a pressing need for community-based awareness campaigns to dispel harmful myths and cultural beliefs that perpetuate discrimination and violence against children with albinism.

The recommendations outlined in this report provide a roadmap for the Tanzanian government to fulfill its obligations under the CRC and ensure that all children, including those with albinism, can live in dignity, free from fear, and with equal opportunities to thrive. The Africa Albinism Network and the Tanzania Albinism Society urge the Committee on the Rights of the Child to prioritize these issues in its review of Tanzania's human rights record and advocate for concrete actions to safeguard the well-being and rights of children with albinism in Tanzania.