

GLOBAL CHILD FORUM

A WORKBOOK
FOR BUSINESS

How

TO

Implement a
Children's Rights
Perspective



WHY USE THIS WORKBOOK?

Global Child Forum brings together thought leaders and influencers from business, civil society, academia and government in order to spur corporate action for social change around children's rights.

Although considerable efforts have been undertaken by many businesses to respect children's rights, obstacles remain. Numerous companies, for example, are uncertain as to how to begin addressing the issue of children's rights. Global Child Forum has therefore developed this workbook for businesses to use at the outset of their children's rights journey as well as for those looking to advance work already underway.

CHILDREN AT THE HEART OF SUSTAINABILITY

It is often the case that companies state an intention to address human rights first, and after think about the issue of children's rights. However, if your company is aligning with the UN Guiding Principles on Business and Human Rights (UNGPs)¹, it has in fact already committed to paying particular attention to the rights and needs of vulnerable groups, including children, women, migrants, refugees, indigenous peoples, and people with disabilities. Respecting and supporting children's rights aligns with a long-term perspective of sustainable corporate performance, positioning your business to gain long-term direct benefits such as brand reputation, increased employee motivation, improved relationships with suppliers, and risk management. In other words, promoting children's rights is not only the right thing to do; companies do well by doing good.

BUSINESS IMPACT ON CHILDREN

Children can be positively and negatively affected by business decisions and activities in both obvious and subtle ways. More obvious impacts can be seen within supply chains and workplaces, where children as young workers aged 15–18 are legally employed. Such children have no protection from hazardous tasks and long working hours that could adversely affect their health or education. Less obvious impacts include how human resources policies address parental leave or the manner in which products are used, perhaps in ways that are detrimental to children's health or self-esteem.

ALIGNMENT WITH EXISTING FRAMEWORKS AND GUIDANCE

The workbook has been written in alignment with the UN Guiding Principles on Business and Human Rights (UNGPs) and the Children's Rights and Business Principles (CRBPs). Other guidance and best practice are referenced and made available to help you gain clarity and understanding on children's rights within your business operations.

We hope that this guide will not only inform and inspire, but also equip business leaders and sustainability professionals with tools to take action – action to ensure that children's rights are respected and supported by businesses across the world. What is good for children, is good for business.

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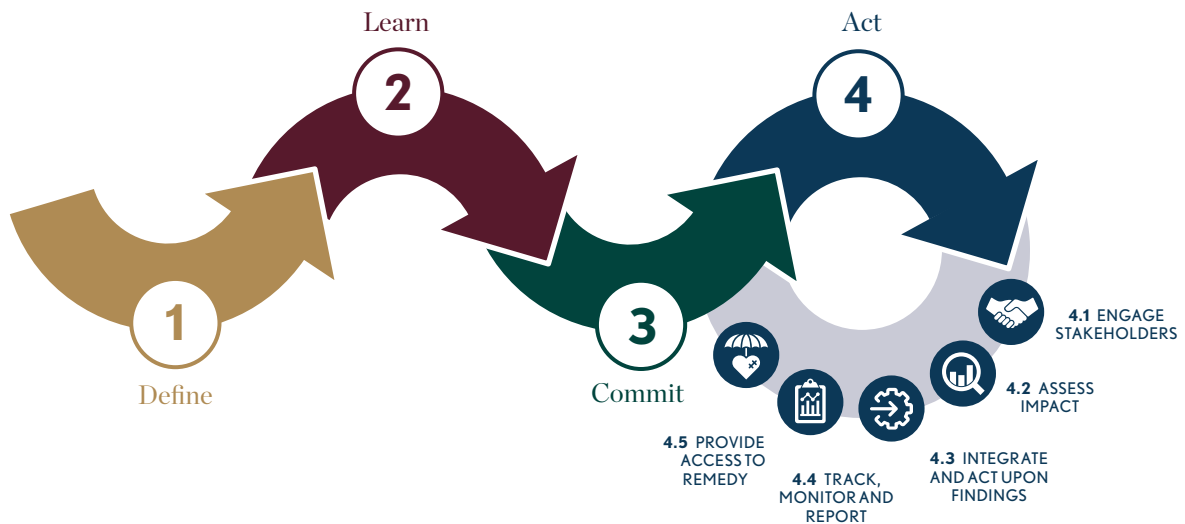
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Introduction

ABOUT THIS WORKBOOK



The purpose of this document is to provide a practical step-by-step guide for companies on how to incorporate children's rights into existing business processes using available human rights guidance. The guidance is based on the two key authoritative standards regarding business and children's rights: The United Nations Guiding Principles (UNGPs), and the Children's Rights and Business Principles (CRBPs).

A child is defined by the UN Convention on the Rights of the Child as **a person below the age of 18.**



All the resources included in this workbook are also available via the Global Child Forum Knowledge Centre.

The workbook aims to:

- Inform and inspire businesses and senior leaders as well as representatives responsible for human rights and sustainability.
- Help businesses understand the need to focus on children and their specific vulnerabilities.
- Equip sustainability practitioners and other key

- employees with knowledge and clear step-by-step guidance to understand and address your company's impact on children.
- Assist businesses in making use of tools, guidance and frameworks on children's rights.
- Introduce ways to embed learnings throughout your organisation that lead to taking the best and most effective decisions for children.

WHY CARE ABOUT CHILDREN'S RIGHTS?

Children are important stakeholders for all businesses, in all industries and across all geographies to varying degrees: as consumers, family members of employees, workers within your supply chain, community members affected by your supply chain or as future employees and business leaders of your company.

Children are more vulnerable than adults because they are, to a large extent, still developing both physiologically and psychologically. Furthermore, children are dependent on adults to make decisions for them, as their ability to voice their opinions to adults in general and to the corporate sector in particular is often limited.

GIVEN THEIR HEIGHTENED vulnerability, children are more susceptible to the impact your business may be having and therefore require special attention. The impact a business has on children can be broad, long-lasting and even irreversible – almost every business activity leaves a footprint on children's lives. *For example:*

– Employing migrant workers involves disruption. Entire families must relocate, giving rise to significant and risky change for the children involved, or, as often occurs, children

are left behind and grow up without their parents.

- Products and services can have unforeseen or unintended impacts. An internet service provider, for instance, risks giving children access to harmful online content or exposing them to potential online abuse.
- The environmental impact of producing your product or service could affect the access a child and their community has to resources, land or even their right to health through issues such as air quality or access to healthcare.

Definition of a young worker

A young worker is a worker under the age of 18 but above 15 or the minimum school leaving age, whichever is oldest.



One of the key areas to address with regards to young workers is what work and tasks are safe. More information can be found on the ILO website.



Adopting a children's rights perspective shouldn't be separate from other processes. Rather, it can serve to strengthen your existing human rights and sustainability work by incorporating this perspective into your values and commitments. This workbook aims to provide guidance on how to incorporate children's rights into your current activities.

There are direct business benefits for engaging on children's rights, *for example*:

- + Working for a responsible company contributing value to society, results in lower staff turnover and the ability to attract a higher quality workforce
- + Supporting young workers can benefit the future of your company as they mature and learn.
- + Responsible brands are increasingly preferred by consumers and investors.
- + Manage brand reputation and value.
- + Investing in children's healthy development often results in worthwhile dialogue with key stakeholders.
- + Improved business continuity and more sustainable supply of goods resulting from integrating human rights and increased engagement with suppliers and workers.
- + Discovering new opportunities as a result of taking a children's rights perspective on customers, operations, employees and surrounding communities.

Your business could be a powerful force for change, impacting the well-being of children across the world. Using this workbook, we urge you to:



- Take action to understand and address any negative impacts your business might have.
- Advocate for children's rights across your business and business relationships, encouraging others to act in the best interests of children.
- Invest your resources effectively in programmes relating to children and their communities based on the actual impact of your particular operations and the affected stakeholders' needs.

Best interests of the child

As outlined in the UN Convention on the Rights of the Child, all adults must do what is best for children. When adults make decisions, they need to consider the child's views, aspirations, safety, well-being, family environment, skills, as well as many other considerations.

1

Clarifying roles and responsibilities

This section explores why and how children's rights is a responsibility for a company's top management and provides resources and examples on how companies can incorporate and embed children's rights into corporate governance structures.

1.1 WHO IS RESPONSIBLE FOR THE CHILDREN'S RIGHTS AGENDA IN YOUR COMPANY?

The board of directors is ultimately responsible for committing a business to respect human rights (including children's rights) through its formal governance structure. As such, boards are increasingly expected by governments, civil society and consumers to proactively ensure that businesses respect children's rights throughout their respective operations.

In addition to various guidance documents setting out how companies can choose to act with respect for human rights and children's rights, there are also legal requirements in some countries that stipulate actions required at the board level. Two examples are:

UK'S MODERN SLAVERY Act requires the approval, signing and publication of annual statements outlining efforts to eradicate modern slavery from company operations and supply chains.² This ensures that the issue of modern slavery (which includes the Worst Forms of Child Labour) is discussed at board meetings.

THE FRENCH DUTY of Vigilance Law requires action from parent companies to identify and prevent adverse human rights and environmental impacts resulting from their own activities as well as those of subcontractors and suppliers. The law requires companies to identify, analyse and rank risks and have in place established procedures to regularly assess subsidiaries, subcontractors and suppliers.³

1.2 WHAT DOES THE RESPONSIBILITY ENTAIL?

Businesses have a responsibility to respect human rights and children's rights. In order to comply with this, the UN Guiding Principles on Business and Human Rights⁴ state that businesses should have in place policies and processes that are appropriate to their size and circumstance, including (to the right):

COMPANIES THAT ARE proactively investing in children's rights often anchor a children's rights



UN GUIDING PRINCIPLES ON BUSINESS AND HUMAN RIGHTS

A policy to respect human rights, including children's rights.

A human rights due diligence process to identify, prevent, mitigate and account for how businesses address their impacts on human rights, including children's rights.

Processes for remediation of any adverse human rights impacts a business causes or to which they contribute. Or in other words, all victims of exploitation or abuse which the company has caused or have played a part in, have a right for their situation to be corrected, for example through compensation .



agenda at the board level by making a public corporate commitment. This commitment can take a number of forms, including as an addition to a vision or mission statement, or by communicating intentions or making a pledge related to children's rights.

1.3 HOW TO EMBED CHILDREN'S RIGHTS INTO YOUR COMPANY'S PROCESSES?

Once your company has made its commitment to children's rights, engaging the relevant internal stakeholders, will help to develop and communicate your overall children's rights vision. Ensuring you have clear, actionable goals for each department. This allows internal stakeholders to take responsibility for – and action on goals related to children's rights in their respective departments, increasing a sense of ownership and engagement throughout the organisation. For a business with a less developed human rights strategy, initial support from the sustainability and/or legal departments will almost certainly be needed to assist in setting goals. Outside support from experts may also be considered.

Once in place, these defined, actionable goals should ideally be integrated into business activities and governance processes for each department or business unit. By doing so, parallel processes for business and children's rights goals are avoided, and existing reporting structures can be leveraged for follow-up.

Because every business is unique, you can choose to develop governance systems or models to take action and monitor activities to embed children's rights that align with your company specifically. These could include:

- Cross-functional working groups bringing together relevant functions across the business.
- Sustainability guiding functions which focus on awareness raising, information sharing, support and guidance.
- Legal or compliance driven models where emphasis is on oversight and accountability.
- Separate responsibilities in different departments across the business.

ADDITIONAL TOOLS



Shift: "Business and Human Rights: A Five-Step Guide for Company Boards" provides practical guidance for directors on how to make sure senior management is aware of and is addressing human rights issues.



UN Global Compact: "Organizing the Human Rights Function within a Company" can be useful for children's rights and provides a suggested setup for the human rights function in your organisation.



CHECKLIST: CLARIFYING ROLES AND RESPONSIBILITIES IN YOUR BUSINESS

Actions for senior management/ board of directors:

Senior management are engaged.

Senior managers have assigned responsibility to a key individual or team with the ability within their roles to take accountability for work on respecting and supporting children's rights.

Choose or develop a governance system to ensure action and monitor activities to embed children's rights.

Schedule board meeting or senior level meetings for presentation on key issues and plans for embedding children's rights – this should be scheduled fairly early on into this work.

After completing the work in chapter 2 and 4 of this workbook you will have developed a business-wide action plan, from this you can develop Key Performance Indicators (KPIs) and as the senior leadership you should ensure they are integrated into your business strategy.

2

Understanding how your business impacts children

This section provides information and resources that can be used to map out and understand a business' overall interactions with, and impact on, children by focusing on children's rights in the workplace, marketplace and community and environment.



The Children's Rights and Business Principles (CRBPs) examines a business' impacts on children's rights in three areas: *Workplace, Marketplace, Community & Environment*. We suggest completing the following steps to develop an understanding of your company's impact on children. Once you have undertaken this initial mapping and identification, you can use it to inform how to craft a organizational commitment and where and how you will undertake human rights due diligence.

DEFINING WHAT MATTERS



The Global Reporting Initiative: GRI is the world's leading standard for sustainability reporting. In its case studies and deep dives the organization provides in depth guidance on how to assess what issues matter most for an organization from a sustainability standpoint.

STEP ONE

Map your overall operating context

STEP TWO

Identify and prioritise your relevant stakeholders on children's rights

STEP THREE

Identify your potential material children's rights issues to focus on

STEP ONE

Map your overall operating context

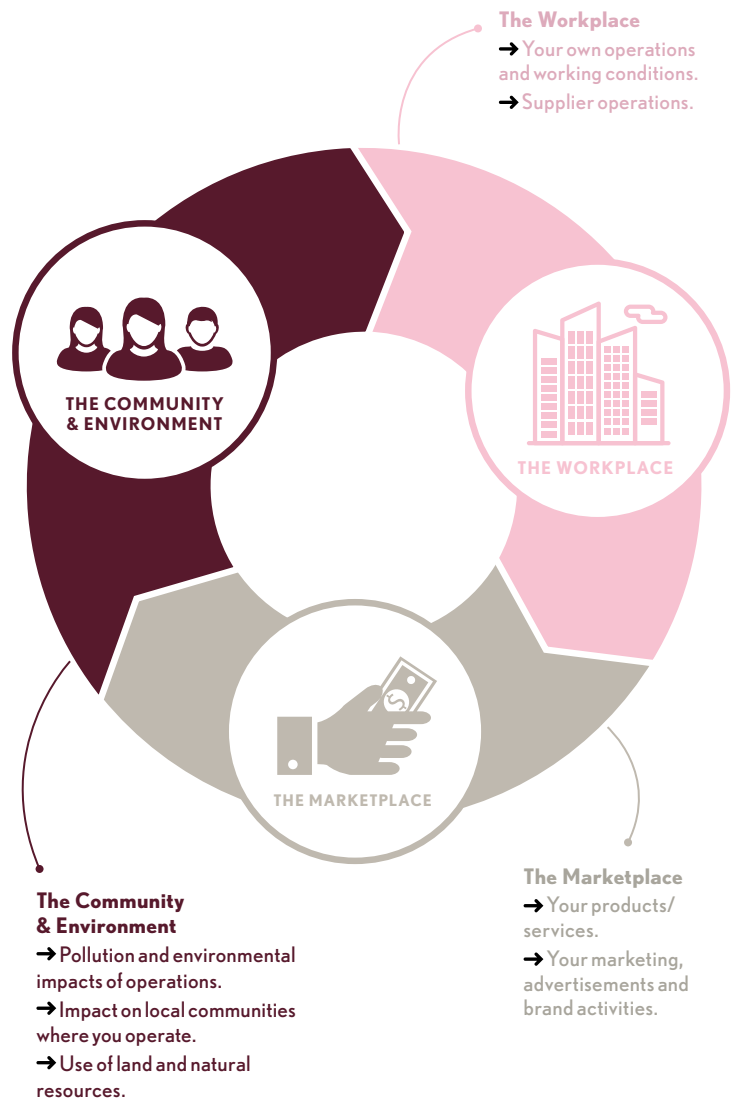
IN ORDER FOR a business to understand its impacts on children (positive and negative), it must consider its operating context, including wider business operations, as well as who its stakeholders are and how it interacts with them.

The first step is to map your organisation's activities, operations and supply chains and start thinking about the areas of your business where there are potential issues affecting children. This can be a high-level mapping initially, and key topics to consider include:

- Where you have a physical presence / office(s) or where your employees work.
- Wider business operations and relationships (e.g. supply chain activities, distribution etc.).
- Where and how your products and services are sold and used.
- What business functions are involved (e.g. human resources, legal, procurement, consultancy, developers, marketing, design, IT).
- Geographies in which you operate and the political, economic and social situations in-country.

Keep in mind the CRBPs framework of the three areas within which your wider business operations, activities and supply chains can be analyzed. Examples to the right might include:

Considering these three areas can be helpful when completing the exercise in Template 1 to ensure you cover all critical areas of your business. You can use or adapt the templates in the end of this chapter to map your operating context or create your own. You can also refer to the Global Reporting Initiative's standards on materiality and boundaries for a fuller understanding of how issues of stakeholder engagement and materiality can be approached.



STEP TWO

Identify & prioritise your relevant stakeholders on children's rights



TIP BOX

IDENTIFYING YOUR STAKEHOLDERS

A stakeholder is a person, group or organisation with an interest in, or influence on, a business project or activity, as well as those potentially affected by it. Relevant stakeholders for the assessment of children's rights impacts include affected rights-holders, duty-bearers and other relevant parties.

- 1** Rights-holders are all individuals who are actually or potentially adversely affected by your business operations and activities, such as parents, young workers, children in local communities, or children consuming your products.
- 2** Duty-bearers are actors who have duties or responsibilities towards rights-holders, such as governments, a company operating a project with direct impact on children, or its suppliers and contractors.
- 3** Other relevant parties may include individuals or organisations whose knowledge or views could assist in the assessment of child rights impacts, such as local NGOs or child rights experts as well as those with a vested interest in your business and its impact such as investors and company owners.

ONCE YOU HAVE a clear view of your business operations and activities, you can map key stakeholders within your sphere of influence to identify where you are directly and indirectly coming into contact with children. When trying to identify stakeholders, you need to consider three main types of stakeholders (explained in the tip box), and also consider both internal and external stakeholders.

ONCE YOU HAVE identified who your stakeholders are, you need to prioritise which stakeholders are most relevant to engage with and when, you can use Template 2 to help with your prioritisation. The template uses the information on the tip box to help you decide which stakeholders will help provide you with useful and accurate information. Crucially, children as stakeholders must not be overlooked. However, consulting children directly requires particular sensitivities; you must ensure that it is in the best interests of the concerned child/children to participate. Engaging with children as part of your due diligence will likely only take place in assessing and verifying your impact as outlined in chapter 4. For further guidance on prioritising stakeholders and engaging with child-

ren directly, use UNICEF's '*Engaging stakeholders on children's rights*' tool⁵. Good practice on engaging children includes using children's rights experts or representatives, who can sometimes be found in local authorities as well as civil society groups and NGOs.

When prioritising stakeholders to engage on children's rights, a good approach is to connect specific children's rights issues to specific stakeholders and understand how they relate.

Prioritising your stakeholders

Legitimacy: How legitimate is the stakeholder's claim for engagement on children's rights or a specific children's rights issue?

Knowledge: Does the stakeholder understand how children are impacted?

Influence: Does the stakeholder have regional, national or international influence on public debate around this issue?

Contact with children: Does the stakeholder have access to children's viewpoints and opinions?

Willingness: Is the stakeholder willing to engage with your business?

Local power structures: Ensuring you understand who does and does not have a voice, who is the spokesperson, etc.



STEP THREE

Focus on your company's material issues

USING THE INFORMATION collected on your business's operations, activities and known stakeholders, it can be useful to undertake a first assessment to identify your potential impact on children. When completing the exercise, try and identify the most salient issues, that is, the issues believed to have the most severe negative impact on human rights as a result of business operations, activities and relationships. The intention is to focus on the risk to people rather than the risk to business.

The following are general and non-exhaustive examples of filled-in templates which can inspire you to start to identify initial positive and negative impacts. These are general examples, and you may need to refer to guidance documents or experts to analyse your unique impacts in more detail.

Example: Company A

Company A is an international game app creator which sells its games online via electronic devices like mobile phones.

	BUSINESS OPERATIONS AND ACTIVITIES	STAKEHOLDERS	POTENTIAL IMPACT	CHILDRENS' RIGHTS ISSUES
WORKPLACE	<ul style="list-style-type: none"> → Creating internal HR policies, hiring workers responsible for creating content of app → Procurement of goods not for resale (computers, etc) 	<ul style="list-style-type: none"> → Employees and their families (children) → Business relationships that you procure from → Young workers (undertaking work experience, training or first employment) → Investors 	<ul style="list-style-type: none"> → Treatment of employees and knock-on impact such as wages and working hours and impact on family life and providing for children 	<ul style="list-style-type: none"> → Low wages
MARKETPLACE	<ul style="list-style-type: none"> → Selling products online on phone and other electronic devices → Marketing of apps to customers 	<ul style="list-style-type: none"> → Customer/end user of app. Even if aimed at adults, children could still access the app 	<ul style="list-style-type: none"> → The game app could be inappropriate for children and it could be susceptible to inappropriate pop-ups/ adverts that affect a child's health and self-esteem → Games can help children to learn and develop in an entertaining way if developed appropriately 	<ul style="list-style-type: none"> → Aggressive marketing affecting the health and self-esteem of children → Providing learning and education through gamification
COMMUNITY & ENVIRONMENT	<ul style="list-style-type: none"> → Location of offices → Use of resources or pollution 	<ul style="list-style-type: none"> → Community near offices 	<ul style="list-style-type: none"> → Pollution from office impacts local community or wider community and environment 	<ul style="list-style-type: none"> → Pollution from business activities

Example: Company B

Company B is a global bank, engaged in borrowing, lending and investing activities.

	BUSINESS OPERATIONS AND ACTIVITIES	STAKEHOLDERS	POTENTIAL IMPACT	CHILDRENS'S RIGHTS ISSUES
WORKPLACE	<ul style="list-style-type: none"> → Lending, investing and trading → Other internal processes across e.g. Sales, Human Resources, IT, Finance & Treasury, Legal & Compliance 	<ul style="list-style-type: none"> → Employees, their families and children → Investors 	<ul style="list-style-type: none"> → Long working hours and frequent travel for employees can impact family life and children's access to their parents 	<ul style="list-style-type: none"> → Right to family life for workers who travel often and don't see their children or who work long hours
MARKETPLACE	<ul style="list-style-type: none"> → Borrowing funds from customers and financial institutions → Lending to customers and investing in businesses → Trading → Contacting and reviewing potential investments 	<ul style="list-style-type: none"> → Depositors → Investments → Other investors in companies you have invested in → Employees of your invested companies and their families & children 	<ul style="list-style-type: none"> → Investing in/lending to an online casino that provides a high return while marketing heavily in channels where youth and children are frequent receivers → Providing access of services to parents/ young people → Impact on money laundering and transactions from illegal activities relating to children (trafficking and child pornography) 	<ul style="list-style-type: none"> → Potential unsuitable marketing activities impacting children → Potential connection to money laundering and transactions impacting children
COMMUNITY & ENVIRONMENT	<ul style="list-style-type: none"> → Location of own offices, incl. regional branches → Location of investments' offices and/or production facilities 	<ul style="list-style-type: none"> → Community near offices → Communities near investments' offices or production facilities → Global environment 	<ul style="list-style-type: none"> → Pollution or waste from investments' production facilities impact local community and environment → Positive impact on children through social investments and supporting local communities in proximity to operations 	<ul style="list-style-type: none"> → Pollution from business activities impacting local communities



Example: Company C

Company C is a B2B, designing, manufacturing and selling premium textiles.

	BUSINESS OPERATIONS AND ACTIVITIES	STAKEHOLDERS	POTENTIAL IMPACT	CHILDRENS' RIGHTS ISSUES
WORKPLACE	<ul style="list-style-type: none"> → Employment of workers and HR functions looking after them → Production of products → Activities within other internal departments such as Sales and commercial, Management → Activities by UK suppliers and international suppliers 	<ul style="list-style-type: none"> → Employees and their children → Owner of company → Young people/ workers in the international supply chain 	<ul style="list-style-type: none"> → Ensure income provides for the family → Mental health impact of employment → Flexible working policies and impact on family life → Working hours and impact on family life and workers well-being → Health and safety risks to parents and children 	<ul style="list-style-type: none"> → Right to family life for workers who have long working hours or are unable to support their family adequately with their income
MARKETPLACE	<ul style="list-style-type: none"> → Marketing and sales of own-brand product → Sales of private label products 	<ul style="list-style-type: none"> → Consumers → Companies acquiring our products 	<ul style="list-style-type: none"> → Children can be exposed to the company's marketing since sales and marketing are online → Children could use products purchased by adults which could potentially harm their sensitive skin 	<ul style="list-style-type: none"> → Positive impact on local schools and children
COMMUNITY & ENVIRONMENT	<ul style="list-style-type: none"> → Manufacturing in UK → Farming/Agricultural supply chain activities internationally → Liaison with local schools on various projects 	<ul style="list-style-type: none"> → Community near factory in UK → Community near location where materials are sourced and the impact on children → Children in local schools 	<ul style="list-style-type: none"> → Increased traffic in the area in the UK and road safety for children → Wider impact on communities and children could include use of resources and pollution → Improved educational opportunities → Better understanding of impact on children near manufacturing site 	<ul style="list-style-type: none"> → Pollution from business activities near sourcing communities → Risk of children being exposed to marketing/ product unintentionally, need to child-proof product



CHECKLIST: UNDERSTANDING HOW YOUR BUSINESS IMPACTS CHILDREN

Actions for sustainability and human rights practitioners within companies who have been assigned responsibility by senior management:

Map your business' overall operating context.

Identify and prioritise you relevant stakeholders.

Identify your potential material child rights issues using Template 1 and the guidance in chapter 2.

Human Rights Due Diligence

HRDD is an ongoing risk management process to help companies identify, prevent, mitigate and account for how they address adverse human

rights impacts. HRDD includes four key steps:

→ Assess actual and potential human rights impacts.

→ Integrate and act on the findings.

→ Track, monitor and report how impacts are addressed.

→ Provide access to remedy.

Once you have a list of identified potential and actual impacts, you can use it as the basis for strategy development and further investigation, such as human rights due diligence.



Marks & Spencer

Interactive supplier map provides tracking of all suppliers

RETAILER MARKS & SPENCER has created its own Global Sourcing Principles that align with national and local laws around issues related to human and children's rights such as forced labour, discrimination, harassment, wages, working hours, etc. In addition, the company has published supplier tool kits on modern slavery and forced labour.

The company requires all its suppliers to comply with its Global Sourcing Principles and has developed an interactive map where suppliers are listed, including information on the location, name, type of manufacturer/supplier, number and gender split of workers and where the goods are sold within Marks & Spencer, amongst other things.

The interactive map also provides information on local initiatives to respect human and child rights in line with its Global Sourcing Principles, for example, if the manufacturer is connected to a trade union and has established a worker's committee or certifications of a raw materials supplier.



Link to Marks & Spencer's interactive supplier map.

Template 1

How do your business operations, activities and supply chains impact children?

	Business operations and activities	Stakeholders	Potential impact	Child rights issues	Actions to be taken	Person/department responsible for action
WORKPLACE	Example: → Employment of workers and HR functions looking after them → Production → Sales and commercial → Management → UK suppliers → International suppliers	→ Employees and their children → Owner of company → Young people/workers in the international supply chain	→ Ensure income provides for the family → Mental health impact of employment → Flexible working policies and impact on family life → Working hours and impact on family life and workers well-being → Health and safety risks to parents and children	→ Right to family life for workers who have long working hours or are unable to support their family adequately with their income	→ Undertake a worker satisfaction survey to understand and verify the actual impact on family life, including asking if the wages are adequate etc → Undertake analysis of cost of living and compare with salary in the location of operation	→ Human Resources
MARKETPLACE						
COMMUNITY & ENVIRONMENT						

Template 2

Prioritisation of stakeholders to engage

Use this template to outline which stakeholders can inform you about different issues and why they are best placed to do so. This has been developed from Unicef's guidance and outlines some key qualities to look for in a stakeholders, such as; having excellent knowledge on the issues and impact, being willing to engage and being a legitimate source you can rely on. There is an example available to show you how to use the template.

PEOPLE/ ORGANISATIONS/ GROUPS	CRITERIA						
	ISSUES	Legitimacy	Knowledge	Influence	Contact with children	Willingness	Local power structures
Example: Workers within your company	Right to family life for workers with children and working long hours	Can talk first hand about the impact on their family and children and any impact on family time	Will be able to share stories about what the impact is	No influence on public debate externally, but could share information internally in business	They are in direct contact with their own children	Engagement is voluntary and workers put themselves forward to share experiences as part of impact assessment	Power structures are not relevant for this issue

3

Making a corporate commitment on children's rights

**This section provides examples, tools and tips for
how to craft an organizational commitment to
advancing children's rights issues.**

When you have developed an initial understanding of how your company's operating context relates to children and have prioritised your stakeholders, your company can use this information to make better informed commitments and take steps to make these public. However you may also find it useful to make policy commitments once you have undertaken human rights due diligence and have an understanding of your actual impacts on children. By aligning your corporate commitment with the issues identified, you can be certain that your goals are aligned with your business activity and key stakeholders.

ONE WAY IN which companies often communicate their commitments is through policies or guidance documents. Using the following steps, you can incorporate children's rights into policies effectively:

ADDITIONAL TOOLS



UNICEF: "Children's Rights in Policies and Codes of Conduct" is a specific tool on making commitments to children rights which includes guidance on content for certain types of commitments and policies.



The Office of the United Nations High Commissioner for Human Rights (OHCHR): "The Corporate Responsibility to Respect Human Rights" provides broader human rights commitment guidance based on the UN Guiding Principles' on Business and Human Rights.



The International Labor Organisation's (ILO): "Child Labour Guidance" is a tool that provides specific information on content and ensuring your commitments address conflicts between local laws and ILO conventions on child labour.



Global Child Forum: "Global Child Forum Best Practice on Child Labor Policy" includes best practice and tips on how to craft policy commitments regarding children's rights in the context of child labor."

STEP 1

Collate & review

- Collate all current and relevant policies and guidance documents, both those that specifically relate to children and more general guidance around employees, suppliers and business relationships.
- Review all public statements and commitments on children's rights, human rights and broader sustainability issues.

STEP 2

Assess & develop

- Assess if children are accurately represented based on your operating context, stakeholders and salient issues.
- Review and update policies where appropriate.
- If necessary, consider making new commitments, policies and guidance documents to ensure children's rights are adequately covered.

STEP 3

Check & test

- Engage relevant stakeholders such as suppliers, NGOs and child rights experts to ensure your policies fit the intended purpose.
- Check and test that the guidance meets the needs of your business. This could be done by asking employees or suppliers to read and use it where appropriate.

STEP 4

Communicate & make operational

- Share your commitments and policies with relevant stakeholders, internally and externally.
- Develop the processes and activities necessary to ensure your commitments and policies are embedded. This could include choosing the appropriate channels for communicating, providing training or developing KPIs to uphold the commitments.



TIPS FOR MAKING COMMITMENTS ON CHILDREN'S RIGHTS

- Align the comments to the UN Convention on the Rights of the Child and the Children's Rights and Business Principles.
- Set clear expectations for the behaviours of employees, suppliers and other business partners, for example in the company's code of conduct.
- Reference or provide links to further guidance for employees and suppliers, etc.
- Relate supporting guidance back to core business activities and give examples relevant to your business.
- Consider where stand-alone commitments and policies are useful, vs integrating into current documents such as child safeguarding guidance.



CHECKLIST: MAKING A CORPORATE COMMITMENT ON CHILDREN'S RIGHTS

Actions for sustainability and human rights practitioners:

Collate all current and relevant policies and guidance documents. Some may be specific to children, others may be more general guidance around employee, suppliers and business relationships.

Review all public statements and commitments on children's rights, human rights and broader sustainability issues.

Assess whether children are accurately represented based on your operating context, stakeholders and salient issues.

Review and update policies where appropriate. If necessary,

consider making new commitments, policies and guidance documents to ensure children's rights are adequately covered.

Engage relevant stakeholders such as suppliers, NGOs and child rights experts to ensure your policies are fit for intended purpose.

Check and test that the guidance meets the needs of your business. This could be done by asking employees or suppliers to read and use it where appropriate.

Share your commitments and policies with relevant stakeholders, internally and externally.

Develop the processes and activities necessary to ensure your commitments and policies are embedded. This could include choosing the right channels for communicating, providing training or developing KPIs to uphold the commitments.

Microsoft

Global Human Rights Statement

MICROSOFT INCORPORATES CHILDREN'S rights into their wider human rights statement, including referencing the Children's Rights and Business Principles and children as a vulnerable group to be given special consideration: "... Our business operations are informed by the human rights guidelines described in the following documents: International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work, and Children's Rights and Business Principles, and OECD Guidelines for Multinational Enterprises... Vulnerable groups: In meeting our com-

mitment to respect human rights, we give special consideration to vulnerable groups such as children, women, and persons with disabilities. We strive to ensure that our technology, business activities, and employment practices are respectful of the human rights of all individuals and empower every person to achieve more, consistent with the relevant human rights defined in the: Convention on the Elimination of all Forms of Discrimination Against Women, and Convention on the Rights of the Child, Convention on the Rights of Persons with Disabilities".⁶

TUI: CHILD PROTECTION POLICY

TUI has developed a stand-alone child protection policy recognising its direct contact with children

"TUI Travel PLC is committed to child protection – both those we take on holiday and those in destinations. We condemn the exploitation of children, a fundamental abuse of a child's human rights and dignity, and we reserve the right to immediately terminate business with any person or company that is engaged or associated with any form of exploitation. Travel and tourism businesses have an important role to play in protecting children's rights. The TUI Travel PLC Code of Conduct commits the Group to upholding the principles of the UN Global Compact."⁷

ISS: POLICY ON SAFEGUARDING CHILDREN AND VULNERABLE ADULTS

ISS undertook a deep dive of their policies and developed a dedicated child protection policy to protect children their employees come into contact with. They outline the environments that are relevant and discuss local implementation requirements.⁸



4

A background image showing three people in silhouette, performing a yoga pose (Urdhva Dhanurasana) with their hands clasped above their heads. They are standing on a beach or shore, with the ocean and a sunset sky in the background. The sky is a mix of blue, purple, and orange. The people are wearing dark clothing. The person on the left is wearing a light blue t-shirt with the word 'shine' written on it.

Respecting and promoting children's right in your business

This section provides guidance on developing actions to respect and promote children's rights in accordance with leading legislative frameworks, policy advice and corporate practice.

Once you have mapped your potential impacts on children and stakeholders as outlined in chapter 2, you will have a good foundation to proceed to work on assessing and addressing your actual impact(s) on Children's Rights using this chapter to support your work. The following guidance is aligned with the UN Guiding Principles on Business and Human Rights (UNGPs) as well as other guidance pertaining to how to respect and support children's rights in business. The diagram below provides an illustrative image of human rights due diligence, which is a process highlighted in the UNGPs. It is important to note that human rights due diligence is not a linear process with an end date. Steps can be taken in various sequences, concurrently and repeatedly, and together create an ongoing risk management process to identify, prevent, mitigate and account for adverse human rights impacts.



4.1 ENGAGE STAKEHOLDERS THROUGHOUT THE PROCESS

In chapter 2 of this guidance document you learnt how to identify your stakeholders and how to prioritise whom to engage. Engaging with prioritised stakeholders on children's rights will be useful in all stages of human rights due diligence. By consistently and systematically consulting relevant stakeholders, you can reduce the risk of missing important perspectives while drastically increasing the quality of the child rights initiatives that are implemented. It is important to have a robust plan in place prior to engaging with anyone in order to ensure no children or individuals are negatively affected by the stakeholder engagement. The table on the following page is an example of a stakeholder engagement plan.

Key steps to respect and promote child rights:

→ Engage stakeholders throughout the process.

Businesses need to prioritise and engage with stakeholders in order to be informed at all stages of human rights due diligence.

→ **Assess impact.** Take steps to identify actual and potential impacts on people, including children, which might occur as a result of your business activities.

→ **Integrate and act upon findings.** Once your impacts on children are identified, it is time to prioritise the most salient issues, mitigate existing ones and prevent future impacts.

→ **Track, monitor and report.** Businesses need to monitor the effectiveness of their actions on children and communicate internally and externally the progress being made as well as where further efforts are needed.

→ **Provide access to remedy.** Where impacts on children have been identified, efforts should be made to restore those children to a situation they would have been in had the impact not occurred. Due to the vulnerability of children, some impacts are irremediable and therefore companies should focus on prevention activities.

ADDITIONAL TOOLS



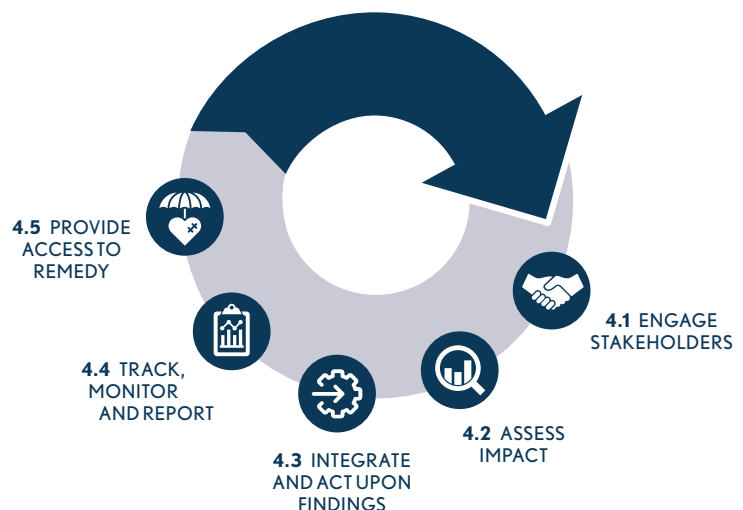
The Danish Institute for Human Rights: "Cross-Cutting: Stakeholder Engagement" provides guidance on how to identify and engage rights-holders.



Shift: "Bringing a Human Rights Lens to Stakeholder Engagement" provides guidance as to the rights issues to engage with stakeholders on and how engagement should take place.



Shift/Mazars: "UN Guiding Principles (on Business and Human Rights) Reporting Framework" provides businesses with questions on stakeholder engagement.



Before engagement

Research: Conduct preliminary research to understand business impact on children's rights and consult with colleagues and any experts if relevant.

Plan: Select any facilitators you may need and formulate questions. If you are planning to engage with children then you need to ensure questions are in an age appropriate language. Also plan how to gain access to children and stakeholders and consider risks of children participating.

Inform any parents or guardians of children to be involved and obtain written permission.

During engagement

Inform any other relevant parties of stakeholder engagement and keep participants informed.

Interact and facilitate a child-friendly consultation.

Make a grievance mechanism available and accessible to all.

After engagement

Analyse information and create an action plan if any remedial steps are deemed necessary.

Provide feedback for any stakeholders consulted.

Ensure the safety and privacy of all participants.

The UNICEF Stakeholder Engagement tool⁹ advises that it is not always in the best interest of children to directly engage them in stakeholder consultations, and the following criteria need to be considered in order to do so:

- What are the specific issues to consult on?
- Ensure you have the right third party facilitation.
- Accommodate children's routines.
- Are children treated with respect in stakeholder engagement?
- How will their involvement benefit children and other rights holders?
- Ensure that participation is voluntary and there is written consent from a parent or guardian.
- Ensure child safeguards are in place and their confidentiality is protected.
- Ensure that consideration and respect is upheld for different beliefs, cultural practices, and norms of community groups.



4.2 ASSESS YOUR COMPANY'S IMPACT ON CHILDREN

The process of identifying a company's impact on children should include identifying both actual impacts that have occurred as well as potential negative impacts that could occur in the future – these are often referred to as “human rights risks”. It is important for businesses to prepare for the task of assessing their impacts; it can be challenging and resource intensive. The aim of this section is to understand how to effectively collect information and data that can help you understand how you impact children and take action to prevent and mitigate adverse impacts. You will need to refer to the information collected from chapter 2 and use the templates you have filled in.

HOW TO ASSESS YOUR COMPANY'S RISK TO CHILDREN'S RIGHTS

The following steps can help you focus your resources and systematically assess your company's impact on children.

Businesses are using various methods to assess their impacts, and it's often beneficial to work with more than one to triangulate and verify information and to ensure it fits in with your business operations and processes. Some widely recommended methods include:

Social Audits – most prominently used within supply chains, often used as an assessment of your company's performance on key compliance and sustainability objectives. Many companies find them of value in providing an overview of the standard of conditions in facilities. There is, however, a growing recognition of the need to raise the bar, by ensuring greater stakeholder engagement.

Human Rights Risk Assessments – are often desk-based exercises using materials already available to provide an overview of key issues, often at impact, product, or country level.

Human Rights Impact Assessments – involve a more in-depth process using stakeholder engagement and site visits to collect new primary data to provide more detailed information on the actual situation within your operations and on local communities. Many businesses are coming to see these as more useful; the information is directly applicable to their operations, giving them the ability to act on real information rather than on assumptions.

The following steps can be used to help you develop your own methodology for human rights due diligence:



Step 1: Background research

A **FIRST STEP** in assessing your company's impact is to gather information already available to your business and sector/industry. This exercise will require less time if you have already undertaken the preliminary information activity suggested in chapters 2 and 3 such as information about your operations and stakeholders, as well as collation and review of policies and guidance documents.

Key activities could include

- Collating and analysing all policies, guidance documents and reports from your company. This might include audits or country reports, depending on how your business collects information.
- Engaging key internal stakeholders and relevant functions in your business to help gather information.
- Collect information about your sector and operations from available data sources and published reports.
- Collect information about the countries in which you operate and the specific child rights issues in those locations for your sector. You could, for example, use the Children's Rights and Business Atlas listed in the tools.
- Engage with child rights experts and NGOs who can provide further insight on your potential impacts and on the situation for children.
- Plan further research. By understanding where your risks could be and using the guidance on materiality, you can start to decide where to focus your resources for future investigation and verification of issues.

Deliverables could include

- An understanding of the social, economic and political operating context for your business and your industry/sectors relevant issues.
- An overview of the systems and processes your company currently has in place to address human rights risks, including an understanding of where children are covered/not covered – essentially, understanding the gaps.
- A detailed hypothesis regarding the impact your company is having on children.
- A plan for next steps to verify your findings and further understand your impacts.

TIP FOR FOCUSING ON CHILDREN

Review the collected information and data using the Children's Rights and Business Principles, taking into account your operations and potential issues in the marketplace, workplace and the community.

ADDITIONAL TOOLS



Global Child Forum and UNICEF: The Children's Rights and Business Atlas is an online, open source tool providing country-by-country data on children's rights in the marketplace, workplace, community and environment.



UNICEF: Country reports on each country in which they operate and the situation for children in those countries, including information on access to health and education and statistics on child labour. These reports

can be useful in understanding the social, political and economic contexts of the countries in which you operate.



The US Department of Labor's Bureau of International Labor Affairs: Findings on the Worst Forms of Child Labor publishes reports on goods/products and the worst forms of child labour.



DLA Piper and UNICEF: Advertising and Marketing to Children, provides information on the regulatory framework in relation to marketing to children.



Step 2: Further investigation and verification

USING YOUR INITIAL your findings of the potential children's rights impacts, you can take steps to gather further data and evidence and verify this information with stakeholders and rights-holders.

Ensuring direct engagement with stakeholders and rights-holders allows your business to take more effective measures.

Key activities could include

→ Undertaking research in relevant locations, sites and supply chain facilities to ensure you understand your impact on children.

→ Engaging with rights holders relevant to the areas of operation under review, including employees.

→ Engaging with other local and relevant stakeholders who can help inform you of your impact. These might include local NGOs, trade unions, child rights experts, local authorities and community groups.

→ Speaking to managers and employees with specific insight within your business operations, relationships and supply chains.

→ Undertaking a full human rights impact assessment in a particular area of operation or country of operation.

Methods to engage with stakeholders could include

→ **Semi-structured interviews:** Allow for standardisation in information collection but also give interviewees the freedom to provide in-depth information in specific areas. The standard mode is to conduct the interview 1-to-1, which is a useful way to gain sensitive information or deeper insight into potential or actual impacts.

→ **Focus groups:** Interviewing groups of stakeholders or rights-holders together where appropriate, this often allows for collection of information from a number of sources quickly, though it is less appropriate for sensitive issues.

→ **Questionnaires/surveys:** Allow a large number of stakeholders the opportunity to provide information anonymously in a standardised format.

→ **Observations:** Allow you to observe what is happening in practice.

Deliverables could include

→ Outline of main findings related to the company's impact in a specific setting.

→ Documentation of the methods used and stakeholders engaged.

→ Primary data collected from interviews or chosen methods, evidence of issues/impacts.

TIP FOR FOCUSING ON CHILDREN

It's important to recognise that oftentimes adverse children's rights impacts are hidden or difficult to recognise. Your company's impact on children may not be direct. Consider ways in which children are indirectly impacted as members of communities near your operations or as the children of workers.

TIP FOR ENGAGING WITH CHILDREN

If you are considering engaging children directly, use UNICEF's guidance to first determine if doing so is in the best interests of the child/children involved. Also, enlist child rights specialists (who are first background checked) to engage directly with children at all times to ensure they are safe and protected from further harm.

ADDITIONAL TOOLS



UNICEF: "Children's Rights in Impact Assessments" is a tool that can assist in developing questions you might want to ask of your own company when trying to understand your impact.



Danish Institute for Human Rights: "Human Rights Impact Assessment – Guidance and Toolbox" is a guidance to undertake a full Human Rights Impact Assessment.



BSR: "Human Rights Impact Assessment" is another guidance on the same topic.



Step 3: Analysis of findings

AT THIS POINT, the collected data from steps 1 and 2 is analysed with an eye toward understanding impacts on children and developing ways to address them in the setting that has been examined.

Assessing your company's risks is an ongoing process rather than a one-off evaluation. You should be prepared to repeat such processes on a regular basis or whenever significant changes are made in your operations.

Key activities could include

- Analysis of data collected from different sources.
- Verifying or rejecting initial hypotheses regarding the company's impact.
- Drawing conclusions from the salient issues evaluated in this specific setting into a broader context: Can the impacts we see in this setting be applicable in other settings as well?
- Investigation of the generalisability of the findings from the specific setting.
- Documentation of learnings with regard to the process of assessing impact.

Deliverables could include

- Document outlining the company's impact on children in the specific setting to be used in action planning.
- Analysis of potential generalisability of the findings outside the specific setting to other areas of your business.
- An updated process with learnings related to the process itself to further improve the company's impact assessment capabilities.

ADDITIONAL TOOLS



ILO-IOE:
"How to do business with respect for children's right to be free from child labour" aims to improve global supply chain governance, due diligence and remediation processes to advance the elimination of child labour.



UNICEF:
"Children's Rights In Impact Assessments" provides insights on how to analyse data and use the findings.



CHECKLIST:

ASSESSING YOUR COMPANY'S IMPACT ON CHILDREN

Actions for human rights and sustainability practitioners and other key individuals within companies:

Based on the findings of your work, select area(s) of your business in which to undertake due diligence.

Begin desk-based research and initial stakeholder engagement with key business functions to gain understanding about your impact in the chosen area of your business.

Engage with child rights experts and NGOs who can provide further insight on your potential impacts and the situation for children.

Make a plan and decide on your methodology for in-depth research.

Determine whether you have adequate resources and expertise to undertake the work, otherwise recruit individuals or consultants who can deliver the work to an adequate standard.

Undertake in-depth research in relevant locations, sites and supply chain facilities to ensure you understand your impact on children.

Engage with rights holders and other local and relevant stakeholders who can help inform you of your impact. Examples include local NGOs, trade unions, local authorities and community groups.

Analyse all information collected to ensure learnings are fully understood.

Verify or reject initial hypothesis regarding the company's impact.

Draw conclusions from the salient issues evaluated in this specific setting into a broader context: Can the impacts we see in this setting be applicable in other settings as well?

Document learnings with regard to the process of assessing impact

Update process with learnings related to the process itself to further improve the company's impact assessment capabilities.

Kuoni

Human Rights in the Travel Service Sector

ENGAGING SEVERAL LAYERS OF STAKEHOLDERS

→ When initiating a country-wide human rights impact assessment in India, travel and destination services agency Kuoni directly consulted a wide variety of identified local stakeholders.

→ These included national government representatives, NGOs, international organizations and children directly.

→ Initially two local NGOs were engaged to develop a framework for conducting focus group interviews to assess the impact of tourism on children's lives.

→ The NGOs selected 47 children living in touristic areas, the cities of Jaipur and Cochin, to participate in the focus groups.

The discussions revealed that the children's perception was that the government's focus was on developing tourism rather than reducing poverty in the affected areas.



Source: UNICEF Child Rights and Mining Toolkit.

HUMAN RIGHTS IMPACT ASSESSMENT METHODOLOGY USED IN KENYA

SWISS TRAVEL SERVICES provider Kuoni conducted a full human rights impact assessment on its operations in Kenya. Beyond the specific framework of the project, its goal was also to design and test an impact assessment methodology that could be used throughout the Kuoni Group.

The assessment was conducted using qualitative methods that provided sufficient standardization for comparing findings. Three specific methods were employed:

1. Background research and document analysis

Background research was conducted in preparation for country and site visits to understand the broader issue of human rights in Kenya, as well as the impact of the tourism sector. Three briefings were the main output of the initial document analysis:

→ Human rights protections in Kenya.

→ Human rights impact of the tourism sector in Kenya.

→ Existing Kuoni policies and practices on sustainability.

2. Semi-structured interviews

After the initial research had been completed, Kuoni conducted a number of interviews with relevant internal and external stakeholders during a country visit to Kenya.

→ Questionnaires were constructed to increase standardisation of interviews. Questions mainly concerned seven focus areas: employee rights, security, customers, suppliers, women & children, community and anti-corruption.

→ Stakeholders interviewed using the questionnaire were: local Kuoni management team, management and workers at key hotels, local community members, NGOs and government representatives.

3. Focus group workshops

In addition to the semi-structured interviews, focus group meetings were conducted with child sex workers and rehabilitated child sex workers.

→ These interactions did not follow the questionnaire as outlined above, and instead sought to establish the causal factors leading to children's involvement in sex work in the tourism sector.

→ The focus group was conducted with support from an experienced local NGO as well as a social worker to ensure the appropriate approach and language.

After information concerning Kuoni's impact on human rights in Kenya had been gathered, the data was compiled and analysed, resulting in an impact report and concrete suggestions on actions to be taken to mitigate the company's impact on human rights.



Source: TwentyFifty, Case Study – Human Rights Impact Assessment



4.3 INTEGRATE AND TAKE ACTION ON FINDINGS

Once a business has identified, assessed and verified its impacts on children, the learnings should be used to mitigate and to prevent future negative impact on children. As part of this, businesses need to prioritise the most salient risks and integrate actions into business practices. Using the guidance in this section and Template 3 will provide you with the tools to undertake a prioritization exercise in order to develop an action plan using Template 4.

PRIORITISING THE MOST SALIENT CHILD RIGHTS IMPACTS

A principled approach is called for when selecting which impacts/issues are to be focused on. The UN Guiding Principles on Business and Human Rights (UNGPR) provide guidance based on the severity of harm to people. The severity can be judged by understanding the scale, scope and irremediability of the issue. The following chart developed by Global Compact Network Netherlands, Oxfam and Shift¹⁰ provides a useful way to assess severity in line with the UNGP framework:

EXAMPLES

Dimensions	Definition	Potentially less severe	Potentially more severe
Scale	How grave or serious the impact would be.	A 14-year-old helping out behind the counter in the family store.	A 10-year-old child working in artisanal mining.
Scope	How widespread the impact would be (i.e., how many people would be affected).	One or two individuals.	A whole community.
Remediability	How hard it would be to put right the resulting harm.	A worker is fired on a discriminatory basis but can be promptly reinstated with appropriate compensation, apologies and guarantee of non-repetition.	A worker contracts an incurable disease due to a lack of appropriate health and safety measures.

KEY CONSIDERATIONS FOR PRIORITISING CHILD RIGHTS IMPACTS:

- The severity of an issue should take into account the likelihood of an impact occurring.
- Consider how specific vulnerabilities of children, such as their health and undeveloped immune systems, can result in impacts.
- Look at the disadvantages that children face, such as their ability to voice concerns and access to reporting issues.
- Use child rights experts to ensure that you have made the correct assumptions and that the prioritisation and actions are in the best interests of the children.



EMPLOYING A FRAMEWORK that breaks down different types of impact is useful in order to identify the best way to take action. It is important to understand how the business affects human rights and people. The UN Guiding Principles on Business and Human Rights (UNGPs) outline three different dimensions of impact – caused, contributed to and linked to:

→ If your company has caused an impact, your business can take steps on its own to stop the activity which is causing harm.

→ If your company has contributed to an impact, you may still be able to stop the activity, or perhaps take steps to change practices that facilitated exploitative or harmful practices. You may also need to work collaboratively with other companies contributing to the same issue since a group of buyers has more leverage over their supplier than an individual company.¹¹

→ If your company is linked to an impact, you can work collaboratively with others to change activities, or perhaps lobby governments to put in place legal safeguards to protect children and other vulnerable stakeholders.

The learnings from chapter 3 on material children's rights issues can be used by your business to prioritise impacts on children's rights, using the guidance provided above.

INTEGRATE LEARNINGS FROM ASSESSMENT OF IMPACTS

Following the assessment of your business' impact on children in a specific area, learnings might be applicable to a broader part of your operations or business activities. Therefore, before action is taken in response, it is important for you to understand the applicability and potential impact of your findings to other parts of your business in order to correctly scope the action to be taken. In other words, could the solution to one issue be applied to similar issues or even to the same issues in other markets? This is related to the concept of generalisability brought up in 4.2, analysis of findings.

ACT UPON YOUR FINDINGS

Once salient children's rights issues are prioritised, two actions need to be carried out:

1 Take action to prevent further harm: eliminate the probability of such events happening again. Prevention is far less costly than remediation and ensures you are acting in the best interests of children.

2 Take action to mitigate observed material negative impacts: reducing the impact and even providing remedy (see section 4.5).

Prevention activities could include

→ Stopping the business activity if it is causing severe impact such as risk to life.

→ Training key stakeholders, employees, suppliers, etc. to conduct business differently, in a way that does not cause harm.

→ Raising awareness of the issues, communicating your standards and expectations to stakeholders, employees, consumers, etc.

→ Monitoring the occurrence to ensure it does not occur again.

Mitigating activities could include

→ Integrate learnings regarding impact on children into current policies and processes.

→ Work within your business and with suppliers to strengthen grievance mechanisms in the workplace and local community – establish that they are accessible to children or individuals/organisations acting on behalf of children.

ADDITIONAL TOOLS



Global Compact Network Netherlands, Oxfam and

Shift: "Doing business with respect for human rights" provides advice for businesses seeking to respect and support human rights.



Shift: "Identifying and prioritizing risks" is a report that provides insights from a workshop with 12 Dutch companies and other expert stakeholders regarding human rights.



Shift: "Using Leverage in Business Relationships to Reduce Human Rights Risks" is a guidance on using leverage in business relationships to reduce risk, and provides information on how to systemically influence the behaviour of others.



ILO-IOE: Child Labour Guidance Tool for Business, page 37 provides guidance on how to integrate and take action on child labour impacts.



- Work with local communities to co-develop actions.
- Educate vulnerable workers and communities on their rights and applicable laws.
- Work with local governments to ensure enforcement of the law, or collaborate with them on important issues.

Whether your actions are intended to mitigate existing impacts or prevent future harm, you will need to develop an action plan to help you outline what the key issues are, what the desired actions

are, who is responsible for ensuring an action is completed and by what date. The action plan is the central document in your efforts to respect and support children's rights and links the identified impacts from section 4.2 to the tracking and monitoring processes outlined in section 4.4.

AN ACTION PLAN can take the following form. Template 4 found in the end of this chapter can also be used by your business to create your own action plan:

IDENTIFIED RISK	ACTIONS NEEDED	OUTCOME	OUTCOME INDICATOR	LEAD	DEADLINE
Unequal parental leave causing problems for women's empowerment in work and children's relationship with father.	<ul style="list-style-type: none"> → Undertake assessment of parental leave needs. → Develop new policy and process to change leave in line with stakeholder feedback and business needs. 	<ul style="list-style-type: none"> → A child friendly parental leave policy that fully supports right to family life. → Empowerment of women in the workplace. 	<ul style="list-style-type: none"> → Higher satisfaction rate in employee surveys. → Increased number of women staying in work after childbirth. → Increased number of women in senior management. 	HR Manager	2021/04/16



CHECKLIST: INTEGRATE AND ACT UPON FINDINGS

Actions for human rights and sustainability practitioners and other key individuals within companies:

Understand the severity of your impact on children using the UNGP framework and guidance in this document.

Engage with stakeholders to verify your thoughts on impact.

Prioritise children's rights impacts using templates from chapter 3.

Understand your company's role with regard to different impacts/issues using the UNGP's caused, contributed and linked to framework, choose actions.

Develop action plan and take action.

Key questions to ensure your actions are in the best interest of children

- Does your action ensure the best interest of the child at all times?
- Does your action ensure the child is safe?
- Does it consider the short- and long-term effects on the child, family and community?
- Have you listened to the perspectives of the children or qualified child rights experts to validate the desired effect of your approach?
- Does your action take into consideration the specific vulnerabilities of children?

Template 3

Prioritisation of salient child rights impacts

Fill in this template, using the information you have collected from undertaking due diligence, and the guidance provided in chapter 4. Once you have populated the details of salient child rights impacts you can hold a workshop or meeting with key colleagues and or outside stakeholders to discuss the findings and prioritize your impacts. The information you have collected could be mostly qualitative and therefore it can be hard to quantify and decide on the impact level. Therefore you need to work together and draw on available expertise to prioritize the impacts using the categories provided. There is an example provided in the template of a salient issue and suggested risk level.

IDENTIFIED IMPACT (Describe the issues)	17 year old (young worker) found work in hazardous conditions in factory	
BUSINESS CONNECTION AND LEVERAGE (Linked, caused, contributed)	Your business directly buys product from supplier factory and therefore has helped contribute to the impact	
CHILDREN'S VULNERABILITY (Disadvantaged, migrant, refugee, disability) YES/NO	The child in question is a migrant, who travelled to the country with family members and so is regarded as more vulnerable and they do not speak the local language very well	
IRREMEDIABILITY (How hard it is to put right the resulting harm)	It is possible to remove the child (young worker) from the hazardous work and give them safe and appropriate tasks	
SCALE (How serious the impact is/could be)	High Child was using dangerous machinery, worked long hours and did not attend school	
SCOPE (How widespread the impact is/could be so how many children are affected)	Only one child / young worker found, but policies and processes showed gaps and so could be possible to happen again	
IMPACT LEVEL (High, Medium, Low)	High Because of risk to life, situation was against the law and the vulnerability of the child	
PRIORITY	High based on the impact level and the business connection as you have a direct relationship with the supplier and are a big client you are able to assert leverage over the supplier and work with them to improve the situation.	

High | Risk of death or long-term health impact

Medium | No long-term impact but could be missing out on education

Low | Child might be working slightly longer hours than allowed

Nikon


PROMOTING AND ALLOWING FLEXIBLE CHILDCARE LEAVE FOR EMPLOYEES

JAPANESE CAMERA MANUFACTURER

Nikon has put in place a program aimed specifically at promoting work-life balance for its employees.

The program allows parents to take childcare leave without citing a reason for up to two years, with the option of spreading out the leave by means of staggered working hours, reduced working hours and hourly leaves.

Nikon reports figures for the programme annually in its Sustainability Report. To illustrate, nine male and 96 female Nikon employees utilised childcare leave with reduced working hours in the financial year ending in March 2018.

 **Source:** Nikon's 2018 Sustainability Report

Telia

TELIA HRIA INCORPORATING CHILDREN'S RIGHTS USING UNGP SEVERITY FRAMEWORK

TELIA USED CONSULTANCY BSR to help assess its actual and potential human rights impacts in Sweden. They used the UNGP framework and put the information into a table. A snapshot is provided below.

 **Source:** Telia 2017 Human Rights Impact Assessment (p25)

Screenshot from Telia 2017 Human Rights Impact Assessment.

BSR | Human Rights Impact Assessment – Telia Sweden

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Priority	Impact	Description	Severity					
			Scope	Scale	Remediable	Likelihood	Connection	Leverage
Medium	Privacy	Law enforcement agencies may make overbroad requests for personal data, or access overbroad data following a court order.	Medium	Moderate	Possible	Likely	Linked	Low
		Telia Sweden or related commercial entities (such as advertising partners) may retain, process, or access more personal information than required for the stated purpose.	Large	Minor	Possible	Possible	Cause	High
		Telia Sweden may develop innovative products and services (such as in relation to the Internet of Things or other adjacent markets) without adequate privacy protections in place.	Large	Moderate	Possible	Possible	Cause	High
Medium	Anti-Discrimination	Rights holders in Telia Sweden (employees and potential employees) may be discriminated against based on characteristics such as gender, LGBT status, national origin, ethnicity, language, pregnancy, or disability—for example, through reduced career opportunities.	Medium	Moderate	Likely	Likely	Cause	Medium
		Rights holders (customers and users) may experience discrimination as a result of certain big data analytics applications and algorithms	Medium	Moderate	Possible	Likely	Linked	Medium

Sansiri

CHILDSAFE ZONES AND LEARNING PROGRAMMES ON CONSTRUCTION SITES

SANSIRI IS A commercial real estate developer in Thailand with a track record of implementing initiatives to reduce its impact on children and promote child rights.

Due to the increased number of migrant workers employed by subcontractors, and with entire families relocating to work on projects, Sansiri realised that this resulted in a high number of children being present on their construction sites.

A first step: Implementing child safe zones

→ To engage with subcontractors, Sansiri collaborated with Baan Dek – a local NGO focusing on fostering children's education and health in Thailand.

→ To ensure children were protected from the hazardous environment of a construction site, Sansiri and Baan Dek worked with subcontractors to provide "child safe zones" on the site where children could play without risk of being harmed.

Taking it one step further: Implementing learning programmes inside safe zones

→ However, setting up safe zones did not constitute a long-term solution to the problem of integrating children from migrant families into Thai society.

→ After the initial setup, using Baan Dek's expertise, a learning programme was instituted in the "child safe zones" to allow migrant children to learn Thai.

→ The end-goal of the learning programme is to transition the migrant children to public schools in Thailand.

Source: Global Child Forum Knowledge Centre, Sansiri: *Every child has the right to learn, to play and to live a healthy life*





4.4 TRACK, MONITOR & REPORT ON CHILDREN'S RIGHTS

Creating a systematic process for tracking, monitoring and reporting is a crucial element in ensuring that implemented initiatives effectively reduce any negative impacts and promote children's rights. Tracking and monitoring does not involve only your own actions and progress; it can also include monitoring the performance of your business relationships, suppliers and customers.

DATA SOURCES

Examples of data sources that are a good starting point for companies setting up tracking mechanisms for the first time includes:

- Information from your assessments and stakeholder engagement as part of human rights due diligence.
- Information from existing grievance mechanisms such as reports from whistle-blower hotlines, complaint boxes, feedback forms or trade union representatives.
- Employee surveys, which could contain information about exploitation, discrimination, and perceptions about how issues are being managed.
- Customer surveys or complaint mechanisms, which could supply information about the use of your products and services.
- Audit processes and reports, which may already include indicators used by your company.
- Country reports if you are operating globally.

DEVELOP KPIs

It's important to consider how your tracking and monitoring processes and the indicators you develop link to your internal and external reporting. Establish a streamlined process to facilitate making comparisons year to year.

Types of indicators to track and monitor on children's rights include:

USE YOUR ACTION PLANS

Using the action plan from page 42 will address the key impacts and initiatives your company needs to track and monitor. In addition, other areas of focus outside the action plan can be included that relate to broader governance and processes that are being improved upon.

IDENTIFY DATA SOURCES

You will need to collect information from various internal and external sources in order to track progress and ensure that people responsible for areas of progress are aware of the pre-determined delivery format of monitoring reports. You can use the suggested list of data sources to the left.

DEVELOP KPIs

Children's rights information for tracking and monitoring can be both quantitative and qualitative. Developing key performance indicators related to your business operations, as well as suppliers', customers' and other business partners' operations will help build a broad picture for your company to report against.

Incident indicators

are the most traditional type of KPI used to track child rights initiatives and can consist of quantitative data directly relating to actual incidents of children's rights abuses.

Process indicators

are used to describe the processes the company has in place to reduce its negative impact on children. They aim to complement the incident indicator through qualitative information the company has in place to assess and reduce the risk of children's rights abuses.

Impact indicators

are used to describe the long-term improvements being made such as initiatives and remedies implemented by the company. These can be reported in full form using case studies describing the improvements.



Key Performance Indicators on children's rights

CRBP IMPACT AREA	TYPE OF INDICATOR	POTENTIAL ISSUE AREA	EXAMPLE OF INDICATOR	ALIGNMENT WITH FRAMEWORKS
WORKPLACE	Incident	Child Labour	Number of children aged 5–17 years engaged in child labour	GRI G4-HR5 SDG 8.7
	Process	Young workers	Policy in place to protect young workers from work that is harmful to their health, safety, or moral development, and beyond their physical and psychological capacity	SDG 8
	Impact	Fair wages	Equal pay for work of equal value / Average hourly earnings of female and male employees by occupation, age, and persons with disabilities	SDG 8.5 SDG 8.5.1
MARKETPLACE	Incident	Marketing	Total number of incidents of non-compliance with regulations and voluntary codes concerning marketing communications, including advertising, promotion, and sponsorship, by type of outcomes	GRI G4-PR7
	Process	Marketing	Number of reported incidents of non-compliance with regulations and voluntary codes concerning marketing to children including advertising, promotion, and labelling	GRI Standard 417-2 and 417-3
	Impact	Product safety/ impact	Number of products that have a positive impact / or no negative impact or harm on the environment in how they are disposed / Reduction in waste through prevention, recycling and reuse	GRI Standard 417-1 SDG 12.5
COMMUNITY & ENVIRONMENT	Incident	Indigenous Peoples	Total number of incidents of violations involving rights of indigenous peoples	GRI G4-HR8
	Process	Community engagement	Percentage of operations with implemented local community engagement, impact assessments, and development programs	GRI G4-SO1
	Impact	Indigenous Peoples	Actions taken on incidents reported	GRI G4-HR8

SDG
IndicatorsGRI
Standards

HOW AND TO WHOM CAN YOU REPORT ON CHILDREN'S RIGHT

Companies need to consider communication beyond merely reporting KPIs as a part of a sustainability appendix in an annual report. This could, for example, include communicating directly to affected stakeholders, employees, NGOs and human rights organisations. To successfully report on children's rights issues, it is crucial that companies adapt their communication efforts to the relevant stakeholder group(s) and even consider providing the information in a child-friendly format.

What reporting on children's rights could include

- Policies and commitments on children's rights and the process in governing these policies and their implementation.
- Your company's operating context and where it has identified its potential and actual harms to children.
- The actions you have taken to prevent and mitigate impacts on children's rights.
- Who you work with in the process of conducting assessments and formulating action plans.
- Your plans/next steps and how you intend to make improvements.





Example of child-friendly reporting

The UN Special Rapporteur developed a child-friendly document on 'Children's Rights and the Environment'.

ADDITIONAL TOOLS

Ensure that measured indicators relate to external reporting standards such as the Global Child Forum's Global Benchmark Report as well as the GRI Standards. This will simplify reporting and align the tracking process with external reporting needs.

 **Global Reporting Initiative - GRI:** "Sustainability Reporting Standards".

 **Shift and Mazars:** "UN Guiding Principles Reporting Framework" provides a structured way to report on human rights issues, including questions and criteria.

 **The Danish Institute for Human Rights:** "Human Rights Compliance Assessment".



CHECKLIST: TRACK, MONITOR AND REPORT ON CHILDREN'S RIGHTS

Actions for human rights, sustainability practitioners and other key individuals within companies:

Using your action plan, you can decide what you will track and monitor progress on, what will be reported internally, and what is appropriate for external audiences.

Decide on governance structures and processes you

are improving based on your findings and track progress.

Identify the sources that will provide you with the information to determine whether progress is being made.

Develop quantitative and qualitative KPIs to report against.

Transparently report on your findings and progress both internally and externally.

Consider developing child-friendly and accessible report formats so you can share progress and actions with relevant stakeholders, including children.

KEY CONSIDERATIONS FOR PRIORITISING CHILD RIGHTS IMPACTS

- The severity of an issues should take into account the likelihood of an impact occurring.
- Consider how specific vulnerabilities of children, such as their health and undeveloped immune systems, can result in impacts.
- Look at the disadvantages that children face, such as their ability to voice concerns and access to reporting issues.
- Use child rights experts to ensure that you have made the correct assumptions and that the prioritisation and actions are in the best interests of the children.

Norsk Hydro

Confronting History, Engaging the Future

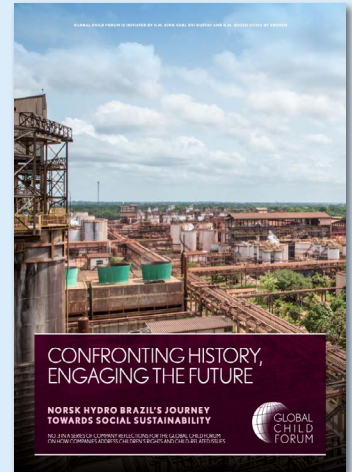
NORSK HYDRO ENTERED Brazil in 2011 with a long history of successfully fostering healthy communities that grew up around its operations in Norway. The difficult history and operating environment of the Amazon region, however, challenge Hydro's commitment to go "beyond compliance" to make a positive difference – particularly with regard to vulnerable

populations, including children.

This case study is part of a series of company reflections for Global Child Forum on how companies address children's rights and child-related issues.



Source: Global Child Forum, Norsk Hydro Brazil's journey towards social responsibility.



Millicom

Reporting child rights indicators internally and externally

MILlicom CLOSELY TRACKS its child rights initiatives using a number of KPIs, for instance:

"% of operations with controls systematically applied in line with their minimum age policy"

"% of operations that have hosted a multi-stakeholder child online protection workshop to date"

Results from the KPIs are reported monthly to the executive committee, and progress is monitored and discussed quarterly by the Board of Directors. Results from the KPIs are published yearly in Millicom's Annual Report, with comparable numbers from previous years included to track progress.



Source: Millicom's Annual Report 2018.





4.5 PROVIDE ACCESS TO REMEDY

Remediation is the act or process of providing remedy, i.e. to restore individuals or groups that have been harmed to the situation they would have been in had the harm not occurred. For example, covering the costs of a child's education and providing other necessary support if that child was employed and missed out on schooling for some period of time.

This section offers guidance on

- What role do businesses have in providing access to remedy for children?
- How to provide child-friendly access to remedy through grievance mechanisms?
- What does a remedy process look like?
- What can effective remedy for children look like?

WHAT ROLE DO BUSINESSES HAVE IN PROVIDING ACCESS TO REMEDY?

Governments have a responsibility to ensure that rights-holders such as children whose rights have potentially been infringed upon have adequate and appropriate access to effective mechanisms for redress.

In the same manner as governments, businesses are responsible for putting in place processes to address adverse human rights impacts they have caused or contributed to, especially with respect to children. A key component in achieving this is creation of a grievance mechanism; that is, a formal complaints process that can be used for children being negatively affected by certain business activities or operations. It also includes providing mechanisms that are accessible and child friendly, thereby enabling children to report issues.

HOW TO PROVIDE CHILD-FRIENDLY ACCESS TO REMEDY THROUGH GRIEVANCE MECHANISMS

Children often lack access to grievance mechanisms. Therefore, it is important that your business develops mechanisms which are accessible and 'child friendly'.

CHALLENGES FOR CHILDREN IN ACCESSING REMEDIES

When considering how your business will provide access to remedies, an awareness of the challenges children face in accessing such remedies is critical. Such challenges might include:

- Children face higher risks of rights abuses and violations than adults.
- Children face barriers such as lack of information or literacy.
- Children's inability to cover fees and costs associated with seeking remedy.
- Physical distance from legal offices, police stations and courts and an inability to obtain transportation to such locations.
- Lack of voice or lack of respect for children's opinions on matters that affect them – some people/systems might regard (or by law not allow) children as being unable to participate in proceedings.
- Remedial mechanisms might not be adapted to children's needs or fail to provide them with appropriate access.
- Children are dependent on the goodwill of adults to inform and support them. They are also dependant financially, logistically and emotionally.

Key considerations when developing a grievance mechanism include

- The child's safety, identity and privacy are protected throughout the process.
- The child is shown they are taken seriously, and that the response is timely.
- Steps are taken to ensure children give informed consent before participating (see guidance on this below).
- Language which is accessible and understood by the children involved is used. Children's potential illiteracy as well as local challenges that could impact the reporting of issues are taken into consideration.
- Collaborations with NGOs or youth groups able to explain the process to children are formed.
- Child rights groups and others can access the grievance mechanisms on behalf of children and young people.
- Young workers have the ability to submit confidential complaints.
- Subsequent guidance and reports are written in child-friendly language.



UNICEF's guidance on informed consent on grievance related to child rights

Before deciding whether to initiate a grievance process related to impacted children, children should be given information about their rights and the potential benefits and risks of their participation. Children should have sufficient space and time to ask questions, and be offered the assistance of a supportive adult, such as a parent, guardian, educator or child protection professional. Where children do not have the capacity to provide informed consent, the informed consent of their parents or guardian should be sought.



WHAT CAN EFFECTIVE REMEDY FOR CHILDREN LOOK LIKE?

The process to the right can be used to provide effective remedy to children. This should be adapted depending on the severity of the impact, the vulnerability of the child and the context in which you are operating. Remember to have the specific challenges for children in mind during the remedy process. It is important that your company develops its own plan now, prior to any incident occurring, so it can act quickly in the best interests of children and your company.

An important item not yet addressed is the necessity for continuous evaluation and improvement of mechanisms. Your company needs to make sure that an evaluation is conducted on what has happened and what preventative steps and changes should be made in order to avoid the same issue from recurring.

STAKEHOLDER ENGAGEMENT IN PROVIDING ACCESS TO REMEDY

When providing remedy, you should be in contact with potential rights-holders who are affected negatively by your business. In addition, other relevant parties such as NGOs, local authorities, unions, and business partners should be engaged when necessary in the process of providing remedy to affected rights-holders. Such parties can also serve to provide an independent oversight and review of decisions made.

PROVIDING EFFECTIVE REMEDY TO CHILDREN

Adverse child rights impact is identified

Immediately: Ensure the child is safe and protected from further harm, victimisation or reprisal.

Engage and use child rights experts to consult with the child and the family to understand their wishes.

Investigate the situation

Put together a team to work with the child rights expert and the involved part of your business, business relationships or suppliers to understand the full impact and also take responsibility for ensuring remediation. The team's role is to first establish:

- What happened? / How did the situation occur?
- Who is responsible? / Who is involved?
- What is the severity of the harm?

Agree on process and next steps

The team must now work together, in consultation with the affected child/children (through the expert) and agree on a process, next steps and ways to support the child. Together they will:

- Determine the appropriate remedial actions needed, taking into consideration children's specific vulnerabilities.
- Ensure the relevant authorities are informed where appropriate.
- Establish what time frame the actions will be completed in, or for how long.
- Determine who will pay for the remedial actions.
- Take steps to monitor and ensure remedies are underway and meeting the needs of the child.

Provide ongoing support and information

The team will also be responsible for ensuring that:

- The child/children and their families are kept informed of progress and steps being taken.
- A learnings exercise is undertaken to fully understand how the adverse impact occurred and what preventative steps can be put in place for the future.
- Consideration is given to long- and short-term actions to be taken; adequate resources are available.



CHECKLIST: PROVIDING ACCESS TO REMEDY

Actions for human rights and sustainability practitioners and other key individuals within companies:

Develop a remedy strategy and process that your company can use and communicate to other business relationships to ensure a standard of remedy is provided.

Engage child rights experts to support access and the process of

remedy when needed, for example, in the development of a grievance mechanism.

Consider the challenges for children in accessing remedy.

Create and implement appropriate child-friendly grievance mechanisms.

Ensure informed consent from children and other vulnerable stakeholders.

Evaluate and continuously improve mechanisms.

Wilmar International

Grievance Mechanisms

THE AGRIBUSINESS GROUP Wilmar International, whose business activities include oil palm cultivation, oilseed crushing, edible oils refining, sugar milling and refining as well as manufacturing of consumer goods, has made its grievance mechanism public. They have established a grievance standard operating procedure (SOP) which provides a process flow chart to follow.



Source: Wilmar International
Grievance Procedure

They also provide access via multiple methods, including email, phone, fax, and in writing. Wilmar publishes grievances found, reports of the incidents, and progress being made to remediate situations.



Source: Wilmar
Grievance List



Template 4

Action plan

Using your collected information and your prioritized salient child rights risks you can create an action plan for your business to clearly communicate what needs to be done, by when and by whom.

IDENTIFIED RISK	ACTIONS NEEDED	OUTCOME	OUTCOME INDICATOR (KPI)	LEAD	DEADLINE



GLOBAL CHILD FORUM

Founded in 2009 by the Swedish Royal Family, Global Child Forum is a leading forum for children's rights and business dedicated to innovative thinking, knowledge-sharing and networking. Global Child Forum believes in the power and responsibility of business, working in partnership with all parts of society, to create a prosperous, sustainable and just society for the world's children. In addition to forums, Global Child Forum delivers research perspectives, best practices and risk assessment tools designed to unlock opportunities for business to integrate children's rights into their operations and communities. For more information, please visit: www.globalchildforum.org.

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PHOTO CREDITS

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GRAPHICS

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