unicef

for every child

CHILD SAFEGUARDING TOOLKIT FOR BUSINESS

A step-by-step guide to identifying and preventing risks to children who interact with your business

Contents

What is child safeguarding?

All children, wherever they live and whatever their circumstances, have the right to be protected, nurtured and free from all forms of violence, abuse, neglect, maltreatment and exploitation as set out in the Convention on the Rights of the Child.[1] Respecting and supporting this right is the essence of child safeguarding.

For companies, 'child safeguarding' refers to actions that address how business operations and work practices impact children's welfare. At its most basic, safeguarding entails the prevention of physical, sexual and emotional abuse and maltreatment by employees and other persons whom the company is responsible for, such as partners, visitors to corporate premises or volunteers.

Child safeguarding refers to all of the actions a company takes to keep all children they come into contact with safe – and includes the proactive measures put in place to ensure children do not come to harm as a result of any direct or indirect contact with the company. Child safe-guarding encompasses the prevention of physical, sexual and emotional abuse, neglect and maltreatment of children by employees and other persons whom the company is responsible for, including contractors, business partners, visitors to premises and volunteers.

Every company whose employees or business partners engage directly or indirectly with children has a legal and moral duty of care to do all it can to protect children from harm. A child safeguarding policy provides companies with a formal approach to managing this duty of care. In addition to its primary role, ensuring the well-being of children, a good child safeguarding policy also protects the company, its employees and its reputation. By setting clear standards of conduct, a properly implemented policy can reduce the risk of litigation by preventing or reducing the number of situations in which children suffer harm as a result of a company failing in its duty of care.

Direct contact refers to face-to-face contact with children. Examples include working directly with children to make films, attend events or participate in research. **Indirect contact** refers to contact with children online, through their data – including images of a child and text posted by a child – and contact via a third party. See page 10 for additional examples.

This toolkit is relevant for all companies, of all sizes and at different levels of maturity in addressing sustainability and corporate responsibility challenges. It provides companies from all industries with guidance on how to identify and mitigate actual and potential safeguarding risks. It outlines procedures for setting up a child safeguarding policy, rolling out the implementation plan and addressing and reporting potential allegations of inappropriate behaviour towards children.

Child protection is only one part of child safeguarding, which is the umbrella that covers all the child-centred actions and measures the company needs to have in place in order to prevent or reduce the likelihood of concerns arising (e.g., codes of conduct, safe recruitment procedures, policies and safe recruitment practices, training and communication). Despite these preventive measures, however, protection concerns about a child may still appear. As illustrated in the figure on the next page, one part of the umbrella represents child protection – the actions an individual or a company needs to take in response to a particular risk or concern about a particular child or children in order to protect them from further harm. Child protection is an essential part of safeguarding if there is a concern that a child is being abused or their safety is compromised.

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1   Convention on the Rights of the Child, article 19, <www.ohchr.org/EN/ProfessionalInterest/Pages/CRC.aspx>.

Child protection is an important part of safeguarding and refers to the actions a company takes to address a specific concern that a particular child is at risk of significant harm due to her or his contact with corporate actors, business partners, products or services. Child protection is essential if there is a concern that a child is being abused or his or her safety is compromised.

The link, and difference, between child safeguarding and child protection

Child safeguarding

Safeguarding
Lead

Policies

Safe
Recruitment

Codes
of Conduct
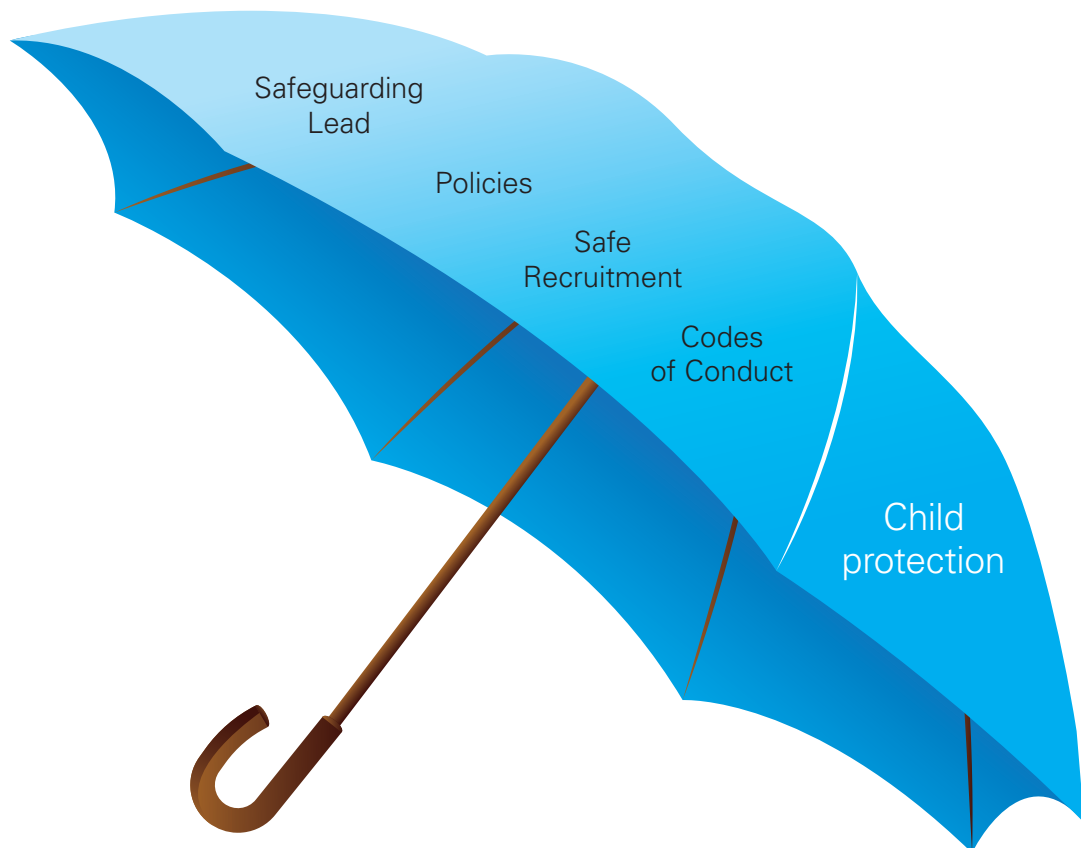
Child
protection

Why do children need safeguarding?

The impacts of abuse on a child's physical, mental and emotional health can be severe and long lasting. Global studies suggest child abuse remains rampant: More than 1 billion children aged 2–17, or 1 in 2 of the world's children, have suffered physical, sexual or emotional violence or neglect in the past year.[2] One in five women and 1 in 13 men report being sexually abused as children,[3] and every five minutes a child dies as a result of violence.[4] Violence and abuse against children often remain hidden because of the reluctance of victims to disclose their abuse, seek help to cope with the experience or take action to protect themselves from further victimization.[5] For example, nearly half of all adolescent girls aged 15–19 who reported ever having experienced physical and/or sexual violence said they never told anyone about it.[6]

In most circumstances, children are less powerful than adults and this makes them inherently more vulnerable. Therefore, it is the responsibility and duty of adults to protect children from harm and respond in situations where children are at risk.

There is increased recognition of the global nature and scale of child abuse and maltreatment, and a number of multi-stakeholder initiatives are working across sectors to address the issue, including the Global Partnership to End Violence Against Children[7] and the Solutions Summit.[8]

While the availability of statistics on child abuse linked to business activity is limited, there is a growing recognition of the potential risk to children's well-being and dignity caused by adults working in positions of trust.[9] The majority of companies, their employees or affiliates come into direct or indirect contact with children at some point during the course of business, and may cause harm to children if they fail to adequately identify and address this risk.

Since risks may become incidents in very different situations – ranging from physical and sexual abuse to violation of a child's data privacy to impacts of a viral advertising campaign – all companies should carry out a safeguarding risk assessment to identify which issues are relevant for them to address.

Just as the implications for children's safety may surface in various situations, abuse takes many forms: a company employee might engage in child sexual abuse while travelling for business; a child might be bullied or groomed while using an online chat room hosted by a staff member; or a child may be subjected to harmful or inappropriate actions while modelling in an advertisement. Child abuse can occur in multiple ways as it relates to companies, including:

- Physical abuse, including a company employee hitting a child while at work as a means of control or punishment. This could include any employee in direct contact with a child such as security personnel or a restaurant or amusement park employee.

- Sexual abuse, including sexual activity with a child below 18 years, irrespective of local country definitions of when a child reaches adulthood. This could include an employee soliciting children for sex or a company employee downloading child sexual abuse images on their computer.

- Commercial exploitation, including employees engaging in commercial sexual exploitation of children, for example a hotel employee facilitating sexual abuse by hotel guests. Commercial exploitation may also be indirect, for example in a situation where a company is using children as unpaid promoters of sharable and viral commercial content.

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[2] Hillis, Susan, et al., 'Global Prevalence of Past-Year Violence Against Children: A systematic review and minimum estimates', *Pediatrics*, vol. 137, no. 3, January 2016, p. 1, available at <www.cdc.gov/violenceprevention/childabuseandneglect/vacs/publications.html>.

[3] Stoltenborgh, Marije, et al., 'A Global Perspective on Child Sexual Abuse: Meta-analysis of prevalence around the world', *Child Maltreatment*, vol. 16, no. 2, May 2011, pp. 79–101.

[4] World Health Organization, *Global Health Estimates (GHE) Summary Tables: Deaths by cause, age, sex and region, 2012*, WHO, Geneva, 2014, recalculated by UNICEF for ages 0–19.

[5] United Nations Children's Fund, *A Familiar Face: Violence in the lives of children and adolescents,* UNICEF, New York, 2017, p. 8, available at <www.unicef.org/publications/index_101397.html>.

[6] United Nations Children's Fund, *Hidden in Plain Sight: A statistical analysis of violence against children*, UNICEF, New York, 2014, p. 90.

[7] Global Partnership to End Violence Against Children, <www.end-violence.org>.

[8] Solutions Summit, <www.solutions-summit.org>.

[9] *See, for example*: Keeping Children Safe Coalition, 'Standards for Child Protection: Tool 1', 2011, open PDF from <https://resourcecentre.savethechildren.net/node/8559/pdf/kcstool1-_english.pdf>.

- **Online abuse**, including grooming or online bullying, exposure to inappropriate content or contact through for example online chatrooms or video games, or inadequate data protection.

- **Emotional abuse or ill-treatment**, including repeatedly conveying to a child that he or she is worthless or inadequate, such as an employee making hurtful or discriminatory statements to a child.

- **Neglect**, which includes inadequate care or supervision, such as an airline steward disregarding his or her duties to care for children travelling alone, or not giving access to appropriate medical care or treatment to a child when it is needed. Sometimes a company's employment policies can unintentionally result in children being neglected, for example, inflexible working conditions could mean that parents are not able to take their children to the doctor or older children have to stay home from school to care for younger siblings.

Since abuse occurs in many different forms, all companies should have a zero-tolerance policy stating that no abuse or cause of harm towards children is allowed in any form. Principles of equality should be included in these policies, stating that all children have equal right to protection regardless of any personal characteristic, including their age, gender, ability, culture, racial origin, religious belief and sexual identity. It is also important to note that certain forms of abuse disproportionately affect girls, and there is additional vulnerability and increased risk for children who are disabled, lesbian, gay, bisexual, transgender and intersex young people, children from minority ethnic groups, displaced or refugee children, and those who are in institutional care.

> **Child abuse** includes all forms of physical and emotional ill-treatment, sexual abuse, neglect or negligent treatment, and commercial or other exploitation resulting in actual or potential harm to the child's health, survival, development or dignity in the context of a relationship of responsibility, trust or power.

The guidance outlined in this toolkit is informed by the practical experiences of companies that have established child safeguarding policies and programmes, as well as the ongoing work of UNICEF and Article One in developing human rights and business guidance. These tools and materials were developed as part of a three-year partnership between UNICEF and the LEGO Group. The collaboration includes the development of a child safeguarding policy and training materials, along with the development of implementation mechanisms.

The next section introduces six steps in the process of developing a child safeguarding programme. Throughout the toolkit, scenarios from various business environments are used to demonstrate the work in practice.

Why do children need safeguarding?

HOW IS CHILD SAFEGUARDING DIFFERENT FROM RESPECTING CHILD RIGHTS?

Freedom from abuse is every child's right, and safeguarding children against abuse is one part of a company's responsibility to respect and support child rights. But corporate responsibilities extend to ensure that child rights – from the right to education and health to the right to be free from child labour and discrimination – are respected in all aspects of business activities. This includes not only safeguarding against abuses by employees and partners, but also ensuring that child rights are respected at each stage of the company's value chain, beginning with the procurement of raw materials and continuing on to the use of products and services by end users, including children.

Two set of principles offer vital information on the corporate responsibility to respect child rights: the **United Nations Guiding Principles on Business and Human Rights**,[1] which outline key steps companies should take to 'know and show' respect for human rights; and the Children's Rights and Business Principles,[2] which build on the Guiding Principles by providing guidance on the actions companies can take to respect and support children's rights in the workplace, marketplace and community. In addition, UNICEF's *Children's Rights in Impact Assessments*[3] provides useful guidance for companies seeking to integrate a child rights lens into their formal risk assessment process.

[1] Office of the High Commission for Human Rights, 'Guiding Principles on Business and Human Rights:
Implementing the United Nations "Protect, Respect and Remedy" Framework', United Nations, New York and Geneva, 2011,
available in all six United Nations languages at <www.ohchr.org/EN/PublicationsResources/Pages/ReferenceMaterial.aspx>.
[2] UNICEF, United Nations Global Compact and Save the Children, 'Children's Rights and Business Principles', 2013,
<http://childrenandbusiness.org>.
[3] United Nations Children's Fund and Danish Institute for Human Rights, Children's Rights in Impact Assessments:
A guide for integrating children's rights into impact assessments and taking action for children, UNICEF
and DIHR, Geneva and Copenhagen, December 2013, open PDF from <www.unicef.org/csr/css/Children_s_Rights_in_Impact_As-
sessments_Web_161213.pdf>.

SCENARIO: AIRLINE SETTLES CASE ALLEGING PILOT'S ABUSE OF CHILDREN

In 2016, an airline settled a case regarding the abuse of 38 children aged 5–18. The case centred on the actions of a pilot who allegedly abused children over the course of 2001–2013 while volunteering at company-sponsored orphanages in Kenya and Uganda. The prosecution argued that the company could be held vicariously liable for the pilot's actions and that the airline had a duty of care for the children abused in company-sponsored orphanages.

The airline agreed to the settlement, but denied liability. In response, lawyers for the victims said, "This settlement should send a message to organizations which send their employees to work or volunteer with children. They need to ensure proper safeguards are in place to prevent such horrific acts."

Lesson learned: If the airline had an effective safeguarding programme in place, this abuse could have been prevented. For example, if appropriate recruitment, training and procedures for engagement at the orphanage, as well as reporting structures for flagging concerns had been in place, the pilot might never have been recruited by the company or allowed to engage directly with children.

Developing a child safeguarding programme

This section describes six crucial steps for the development of a corporate programme in child safeguarding. It presents a step-by-step, stand-alone programme, but the child safeguarding policy commitment and implementation plan that follows from this process must complement, reinforce and cross-reference existing company and staff policies.

As part of developing a comprehensive programme, a company that regularly comes into contact with children – directly or indirectly – should seek support and guidance and work with a safeguarding expert. When a company starts developing a child safeguarding programme, the process typically involves the following steps:

Conduct a child safeguarding risk assessment that reveals the ways in which employees and partners acting on behalf of the company come into direct or indirect contact with children.

STEP 1

Develop an implementation plan to meet the commitments outlined in the safeguarding policy.

STEP 4

Conduct a gap analysis of existing policies, processes and governance structures that may support the safeguarding of children, and develop additional structures and guidance to fill relevant gaps.

STEP 2

Establish a reporting structure for actual and potential cases of abuse to be received and processed.

STEP 5

Develop a policy commitment that outlines the company's commitment to keep children safe from abuse and maltreatment by its employees and partners acting on its behalf.

STEP 3

Provide guidance for employees on how to take relevant action when a concern is / needs to be reported.

STEP 6

SCENARIO: A GAME APP REMOVED DUE TO MARKETING COMMUNICATIONS EXPLOITING CHILDREN'S VULNERABILITY

A food-processing company created an app that children could access through a quick-response code on the company's website. The app included two games in which players controlled a character to collect items to populate the game 'world'. The following concerns were raised:

- The game blurred the lines between the game world and the real world.
- The questions in the game were directed at children playing the game or the characters in the game.
- The persuasive and negative language and tone in the game could lead children to understand that if they did not consume a certain product, they were failing in some way.
- The game prompted children to ask their parents to buy the product.

In 2013, a ruling required the company to take down the app with instructions to ensure that the marketing communications did not exploit children's naivety or vulnerability nor make them feel inferior if they did not buy or ask their parents to buy the company's products.

Lesson learned: *If the company had an effective safeguarding programme in place, it would have been aware that this type of marketing communication is classified as commercial exploitation, and could have created a game that ensures children would have a safe and positive gaming experience.*

Step 1
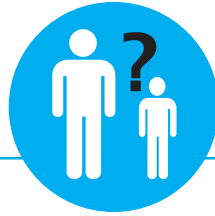
Risk assessment

Carrying out at an assessment is the first step to understanding the risks business activities might pose to children's well-being through interaction with the company, its employees or its representatives. The self-assessment can be a stand-alone appraisal, or integrated into an existing risk management system or impact assessment processes. The goals of the assessment are to reveal all opportunities company employees and representatives have that could place them in direct or indirect contact with children as part of their job responsibilities, and to determine the risk level of each engagement.

Examples of direct contact and potential risks include:
- Direct sales to children (a retail associate in a clothing story watches a child undress in a changing room).
- Marketing activities that require engagement with children (a toy company employee physically abuses a child actor while producing a commercial featuring the company's product).
- Travelling on behalf of the company to places where child sexual exploitation is a concern (a corporate employee solicits children while on business travel).
- Interacting with children living in or nearby company premises (a security guard at a plantation site physically and or sexually abuses children).
- Volunteering with charities for children on behalf of the company (an employee abuses a vulnerable child during a corporate volunteer mentoring day for disadvantaged young people).
- Providing care for a child or young person (an airline steward uses physical force to control a child while responsible for the child's safety).
- Commercial venues that offer entertainment and leisure activities for children or young people (a theme park employee makes repeated racial remarks to a child).

Indirect contact and examples of risks includes:
- Communicating with children or young people through online platforms (an employee grooms children through direct messages on the company's video game platform).
- Having access to sensitive child data (an insurance company representative mishandles children's data and shares their personal information to a third party without consent).
- Marketing through social media platforms (children's vulnerability is exploited when they are encouraged to be 'cool' by reposting or sharing an advertisement in social media, while it is not clearly identified as a form of commercial promotion).
- Receiving a claim of child abuse (a young person calls a customer service line reporting abuse by a company employee, but the operator does not know how to report the incident).

- Collecting children's images (photos/videos are used in an undignified way or with identifying information about the child that fails to respect her or his right to privacy or leads to the child being targeted for abuse).

Once the opportunities for contact have been mapped out, questions should be asked to understand where the areas with the highest potential risk or impact exist. This includes:

1. What contact does the company have with children/ young people as part of its business operations?

a. Direct contact with children:
– What is the type of activity and where does this contact occur? (List all types of activity where face-to-face contact with children occurs.)
– Who is involved in this activity? (List all of the roles involved in this contact, and include the details, such as business unit, specific position/type of employee, contractor, partner acting on behalf of the company or volunteer.)

b. Indirect contact with children:
– What is the type of activity, and where does this contact occur? (List all types of activity where indirect contact with children occurs, e.g., online, handling children's data, or images/video.)
– Who is involved in this activity? (List all of the roles involved in this contact, and include the details, such as business unit, specific position/type of employee, contractor, partner acting on behalf of the company or volunteer.)

2. What is the frequency of this engagement with children and/or young people?

3. Does contact with children and/or young people require or allow employees or representatives to be alone with children? If so, how?

4. What are the potential risks to children and/or young people due to that contact? (Consider health, safety and potential abuse or neglect issues, as listed on page 6.)

By answering these questions, a company will be able to identify opportunities for contact between its employees/ representatives and children, and determine the degree of risk for each. A template for the risk assessment is provided in Annex I. Follow-up assessments should be conducted when new business opportunities, projects or campaigns are launched to evaluate the potential for new risks and come up with ways to mitigate those risks.

Step 2

Gap analysis

The next step is to conduct a gap analysis to map the relevant policies and processes already in place. This enables the business to understand the extent to which child safeguarding has been integrated into its risk management approach. A best practice gap analysis includes two phases:

Review of current legal and regulatory statutes, including a benchmark of legislation related to child safeguarding, protection and abuse. This would encompass an assessment of the degree to which existing corporate policies and practices meet national legal frameworks in every country the company operates in.

Assessment of management practices that provide additional safeguards beyond legal compliance. This should include a review of:
– existing policies, strategies and practices across the company to determine where considerations related to child safeguarding are already stated, or where they could and should be added;
– guidance for high-risk positions; and
– policies and codes of conduct governing partners acting for or on behalf of the company, along with how these policies and practices are being communicated to the applicable individuals (e.g., employees, contractors).

During the first phase of analysis, the question companies need to ask themselves is: What are the legal requirements with respect to child protection in the countries in which we operate? In many countries, aspects of child safeguarding are incorporated into national legislation, and most countries have laws prohibiting child abuse and child sexual exploitation. In some countries, however, legislation does not reflect the internationally recognized, basic ethical standards. **If there is a conflict between national legislation and international standards, it is strongly recommended to prioritize the international standard.**

For the second phase, companies need to ask: How are we ensuring that we are meeting our safeguarding responsibilities in practice? Specifically, the company should seek to understand how each instance of direct and indirect contact with children surfaced during the risk assessment is currently managed. This should cover the company as well as its business relations. For example:

• Does the company have a governance structure to manage its approach to child safeguarding? How is safeguarding owned and understood at the senior leadership level within the organization?
• Are child safeguarding practices included in the company's employee or vendor code of conduct or as a stand-alone policy?
• Does the company take adequate measures to ensure safe recruitment practices, e.g., conducting background checks[10] for all employees who will have direct or indirect engagement with children?
• Is training on child safeguarding provided to all employees and additional content for employees or partners provided to those who have direct and indirect contact with children as part of their typical responsibilities?
• Is a process in place to report and respond to child safeguarding concerns raised by employees and third parties?
• Does the company promote a culture of accountability where reported concerns are taken seriously, immediate actions are taken to minimize any additional risk, and whistle-blowers are protected?

If the company lacks specific mechanisms to manage risk – for example, whistle-blowing policies and processes to determine how concerns raised about employees should be managed in a robust and transparent way – these should be developed and implemented as a priority. A partner's inability to implement such mechanisms should be considered when entering or continuing a partnership. For additional guidance on how these mechanisms should be structured, see Step 4 and Annex II, which provides a simple template for the gap analysis.

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[10] The process and legal requirements of acquiring a criminal record check vary by country. Additional information on the criminal record certificate requirements of different countries can be found at: <www.gov.uk/government/publications/criminal-records-checks-for-overseas-applicants>.

Step 3
Policy commitment

A child safeguarding policy sets out the company's commitment to keep children safe and articulates what will be done to protect children from harm and respond to concerns. The policy commitment is not the end result of the safeguarding process, but merely a first step that informs the path towards implementation and continuous development. A child safeguarding policy should be based on a thorough understanding of the company's risks as identified during a formal assessment (Step 1).

The policy as well as the accompanying procedural guidance should be tailored to suit the company's need. The commitment could, for example, be integrated into existing policies and company codes, or written into a stand-alone policy, complemented by a separate procedural guidance document – depending on the degree of risk posed to children's safety and well-being by the company activities. In some cases, it may be helpful to have the guidance produced in various formats (Q&A documents, videos, etc.) or translated into various languages. The results of the gap analysis (Step 2) will help determine the most suitable format for the policy commitment. The United Kingdom's NSPCC offers a useful guide on how to draft a safeguarding policy.[11]

When developing the child safeguarding policy, companies should seek to include the points outlined in the checklist on the next page.

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[11] National Society for the Prevention of Cruelty to Children, 'Writing a Safeguarding Policy: How to set out an organisational approach to protecting children', NSPCC, London, 2018, <www.nspcc.org.uk/preventing-abuse/safeguarding/writing-a-safeguarding-policy>.

Child safeguarding policy checklist

POLICY ITEM	DESCRIPTION OF CORPORATE COMMITMENT	✔
Statement of commitment	Outline why child safeguarding is important to the company, and how the company will meet this commitment and its safeguarding responsibilities. This may include references to corporate values, national laws and international human rights standards, as well as proactive measures for risk management.	☐
Risks related to child safeguarding and statement of equality	Outline in broad terms the ways in which the company could pose a risk to children's safety and well-being, through both direct and indirect contact, as determined through the risk assessment. Provide tangible examples of the impact the company may have on children, so that employees and partners fully grasp risks. Include a statement of equal treatment and, when necessary, identify the most vulnerable children (as listed on page 9), who have an increased risk of being negatively impacted by the company's activities.	☐
Definitions	To ensure a common understanding, the commitment should define the following terms: • **Child** – any individual under age 18, regardless of whether the national age of majority is younger. • **Child abuse** – includes all forms of physical and/or emotional ill-treatment, sexual abuse, neglect or negligent treatment or commercial or other exploitation, resulting in actual or potential harm to the child's health, survival, development or dignity. • **Child safeguarding** – actions taken by the company to prevent physical, sexual and emotional abuse and maltreatment perpetrated by employees or other persons whom the company is responsible for, including contractors, business partners, visitors to premises and volunteers. Safeguarding includes proactive measures to keep all children who come into contact with a company employee or representative safe from harm as a result of that contact. • **Child protection** – actions taken to address a specific concern that a particular child is at risk of significant harm due to his or her contact with corporate actors, business partners, products or services.	☐
Applicability of commitment	Clarify that the commitment covers all employees and other persons acting on behalf of the company, and applies to all aspects of the company's operations and business relationships where children are potentially impacted. Reinforce that safeguarding is everyone's responsibility and that everyone covered is required to adhere to the commitment. Explain how the safeguarding commitment links to other company policies and procedures, for example, the code of ethical conduct.	☐
Acknowledgment of the duty of care and other legal responsibilities	Outline the company's commitment to safeguard children and its zero-tolerance approach to child abuse. Include information on the consequences associated with a breach of commitment, for example, penalties, fines or employment-related actions. Where applicable, link the commitment to national legislation in support of child safeguarding.	☐
Governance structure	Name the function or individual within the company that has ultimate responsibility for implementation of the commitment, as well as the 'corporate sponsor' or executive assigned to oversee the commitment.	☐
Reporting structure	Outline the process for internal and external stakeholders to raise concerns regarding the safety and security of children in relation to company operations; this is typically the phone number or email of the person or function responsible for receiving concerns, and often made available as part of the existing company whistle-blower mechanisms.	☐
CEO or chairman of the board approval	The commitment should be signed off at the highest level of the company, by, for example, the CEO or the chairman of the board. Not only does the CEO's signature align with external stakeholder expectations, but it also signals to employees and partners the commitment's importance to the company. Key messages around expectations for keeping children safe should be regularly emphasized by senior management after the launch of the commitment.	☐

Step 3

Policy commitment

DEVELOPING A STAND-ALONE SAFEGUARDING POLICY

Defining the best-suited scope and format for a child safeguarding policy will depend on a number of factors, including: the results of the risk assessment and the gap analysis; the pre-existence and appropriateness of other relevant policies and practices (e.g., whistle-blowing policies, grievance procedures); the strategies already in place to integrate respect for children's rights in the business; the nature of the company's activities, operations and structures – and pragmatism, what will work in the company's specific context.

When a company chooses to develop a stand-alone child safeguarding policy, the document should clearly state its commitment to safeguard children from any harm. To ensure it will be read and utilized by employees and management to guide decision making and employee conduct, this policy should be brief, clear and practical.

The level of child safeguarding risks varies from company to company. Accordingly, the need for more detailed guidance on how these issues are managed throughout the relevant business activities might take different forms. There are opportunities to integrate the employee conduct guidelines into existing codes of ethical conduct or to draft a separate guidance document/child safeguarding code of conduct if the assessment shows extensive risks for children's safety and well-being.

For some companies, their codes already cover appropriate conduct for employees as it relates to vulnerable groups, including children. As part of the policy development process, the original code of conduct should also be updated to better provide guidance on conduct related specifically to safeguarding children.

SCENARIO: IMPLEMENTING A ZERO-TOLERANCE POLICY AGAINST SEXUAL EXPLOITATION

When a mining company commenced work in Eastern Africa, employment opportunities attracted large groups of men who were away from home and had money to spend. Subsequently, brothels appeared near the construction camps. Against a background of poverty and girls dropping out of school, the issue of sexual exploitation soon became apparent.

The company took the issue of child sexual exploitation very seriously and invested time to explore the problem in the local environment and to determine how it could best protect children. To address such issues as prostitution and child exploitation, the company instituted a zero-tolerance code of conduct for all its workers. Staff members are expected to sign the policy at the time they are recruited and annually thereafter, and adherence to the code is mandatory for all national and expatriate staff.

The company also set up a task force to monitor implementation of the policy, including reporting and whistle-blowing mechanisms. Any misconduct results in immediate sanctions.

As part of implementation, the company also works with key actors from local community child protection networks, and any cases of abuse or exploitation are reported or referred to child protection focal points in the community of concern.

Step 4
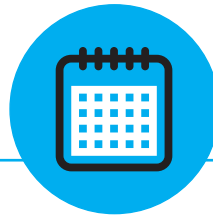
Create and roll out an implementation plan

Drafting or expanding a policy on child safeguarding must be followed by a clear implementation plan to operationalize the commitments throughout the company. This includes developing a governance structure to provide oversight and management of the safeguarding programme, and establishing and implementing guidance for relevant business units, particularly human resources.

To ensure that safeguarding is a priority in the entire organization, it is crucial to have senior management take ownership and continuously support the implementation process. This also helps the company mitigate for potential reputational risks related to child safeguarding issues that may surface in the future.

In addition, the company should develop a robust training and awareness-raising programme as well as mechanisms to report concerns for all employees and partners. The plan should be developed with the support of the child safeguarding expert and include ongoing monitoring of child safeguarding measures, for example, maintaining updated training records, and regularly consulting with employees regarding their knowledge of and comfort utilizing the mechanisms for reporting concerns.

The content in this step covers three crucial topics: governance, human resources, and company-wide awareness and training.

Governance

As a company works to embed its policy across the organization, it is essential to develop a governance structure in support of the policy and to appoint a child safeguarding focal point within the company. Senior management ownership and support should be ensured throughout the process. Governance of child safeguarding can be integrated into existing structures or stand alone. Both the integrated and stand-alone models require that the individuals who have safeguarding responsibility within the organization have an appropriate level of knowledge and expertise.

If the company has a chief risk officer or risk council tasked with addressing a broad range of risks, adding child safeguarding to their mandate can be an efficient and effective way to elevate accountability for the issue. This approach could be appropriate for companies with minor safeguarding risks, as identified during the risk assessment (Step 1).

For companies that have significant safeguarding risks – typically driven by the level of direct contact between the company and children – a designated safeguarding lead and a stand-alone governance model might be required. Together with the safeguarding committee, the designated safeguarding lead would be tasked with operationalizing the child safeguarding policy and would be responsible for processing safeguarding and protection concerns. The safeguarding committee, preferably cross-organizational with representatives from relevant business units, ensures accountability and shared decision making when a concern is reported to the designated safeguarding lead.

In addition to a governing body, it may be appropriate to establish a network of child safeguarding leads across the business. These leads would be the first line of contact in high-risk business units, providing staff and partners with guidance and support. In cases of protection concerns, they would help in submitting claims to the designated safeguarding lead. Leads would not be expected to serve in this role full-time. Rather, they would be provided with training and resources in addition to their regular role to help embed child safeguarding across the business.

Depending on the country context, it could also be useful to establish an agreement with a local non-governmental organization that works on child protection issues. This organization could, for example, help advise the company on the more complex issues that might come up and provide referrals to support services for children who have been harmed.

Step 4

Create and roll out an implementation plan

Human resources

The human resources department has an essential role in making sure that child safeguarding is integrated into company processes and management structures. It also facilitates the promotion of a corporate culture that translates child safeguarding policy into action. Ensuring recruitment practices that focus on children's safety and well-being is an effective way to prevent and minimize risks. Consider the following elements when developing recruitment practices:[12]

1. Planning and advertising

Communicate expectations for the company's commitment to child safeguarding. For example, include a link to the company's child safeguarding policy in the job notice.

2. Application form and self-disclosure

For applicants who will be in direct or indirect contact with children (paid or voluntary), consider use of a self-declaration form consenting to a background check and highlighting any instances of arrest or criminal prosecution.[13]

3. Interviews

Values-based interview techniques can help determine a candidate's attitudes, perceptions and behaviour towards children. If the job specifically involves working with children, the interview questions would be adapted and expanded to determine the candidate's specific suitability. Along with asking about gaps in employment history, the following questions could be used to determine a candidate's attitudes towards child safeguarding:

– What do you understand by child safeguarding?
– Have you ever had any training on child safeguarding?
– Have you ever had concerns about a child? If so, what did you do?
– What would you do if you had concerns about a colleague with regard to his or her behaviour or attitudes when interacting with children?
– Have you previously worked with children in either a paid or voluntary capacity? If so, what are the main reasons that led you to want to work with children?

4. References and background checks

When the job requires direct or indirect contact with children, it is necessary to conduct background checks and acquire a criminal record certificate to reveal potential instances of child abuse. The process and legal requirements of acquiring a criminal record check vary by country.[14] While a criminal background does not necessarily preclude an individual from being hired, information that is disclosed through background checks will need to be risk-assessed to determine whether the individual poses potential harm to children.

In addition to background checks, references can be a powerful tool to get insight on the top candidates' former job performance with regard to child safeguarding. Requiring at least two references from former employers is recommended.

When the contract is signed, all employees, regardless of whether they will be required to have direct or indirect contact with children as part of their job description, should also sign the company's child safeguarding policy. This policy sets the expectations for employees' conduct around children, clearly articulates the behaviour and actions that will not be tolerated, and outlines the consequences for failing to meet the company's expectations for child safeguarding.

5. Induction

Appropriate training for all new and existing employees will enable individuals to recognize their responsibilities with regard to their own jobs and the reporting of poor practices/concerns of possible abuse.

6. Monitoring and appraisal

Performance indicators related to child safeguarding should be integrated into existing monitoring and performance appraisal systems in order to ensure continuous accountability, especially when it comes to higher-risk roles within different business units. There should also be company-wide key performance indicators or annual reporting that tracks the implementation and effectiveness of the zero-tolerance policy.

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[12] *Adapted from:* National Ice Skating Association of Great Britain & N.I., 'NISA Safeguarding & Policies', 2018, available at <www.iceskating.org.uk/index.cfm/work-force-coaching/coaching/nisa-safeguarding-policies>.
[13] At minimum, the self-declaration form should include the candidate's consent to a criminal records check or application for an international child protection certificate, as appropriate. The specific questions it includes should align with the relevant legislation in each country of operation.
[14] Additional information on the criminal record certificate requirements of different countries can be found at the UK Government web page, 'Guidance: Criminal records checks for overseas applicants', 2017, <www.gov.uk/government/publications/criminal-records-checks-for-overseas-applicants>.

Awareness raising and training

Raising awareness and providing training for staff are key elements of the safeguarding journey, and essential to protecting children throughout the company's activities. Ensuring that all employees – from the facilities custodian to the CEO – are aware of the company's commitment and their corresponding responsibility is a vital step towards creating a rights-aware culture. This aims to make sure that child safeguarding is embedded throughout every aspect of the business, and that everyone understands how to identify and respond to a safeguarding 'red flag'.

Adequate levels of awareness raising and training help promote a culture in which all child safeguarding concerns are addressed and reported. There is a continuum from poor practice to abuse, and when one-off incidents such as an employee being alone with a child or making an inappropriate remark to a child are not addressed, there is greater risk of these poor practices recurring, becoming a 'normal' part of the corporate culture.

For some companies, a broad awareness-raising programme may be sufficient. This is especially the case if a company has limited or no direct contact with children. For companies that have more direct contact with children, formally integrating child safeguarding training into annual ethics or compliance training is a more effective model to emphasize the company's commitment.

Company-wide awareness raising can take many forms, and should be informed by the unique culture and approach to communications developed by the company. The communications can take place through all-staff email messages, announcements at staff 'town halls', postings on the company's intranet, policy review at hiring, integration into ethics or code of conduct training or a separate e-learning course on child safeguarding. Regardless of the specific approach, these communications should be ongoing to ensure regular reflection by staff.

The primary objective for the corporate-wide awareness raising is twofold:

• Outline what child safeguarding risks exist for the company, and how staff and partners can spot concerns.
• Educate staff and partners on how to report child safeguarding concerns through the company's reporting structure.

Step 4

Create and roll out an implementation plan

Raising the issue of child safeguarding risks and its prevention can be challenging. Some people may feel threatened by the issue of child abuse or think that it is not relevant to their work. Sensitivity in discussions around child safeguarding is crucial because participants may have experienced abuse as children or as adults. Those facilitating awareness-raising sessions should be skilled in discussing the issues without creating an atmosphere of mistrust or alarm, and be prepared to respond in case individuals experience distress and need additional support. This could involve having a trained staff counsellor present at the sessions, with a list of referral services prepared ahead of time.

Sample safeguarding training slide

Throughout the process of developing and implementing a child safeguarding policy, it is equally important to focus on creating and strengthening a child safeguarding culture within the company. If robust reporting policies are developed, but employees are not aware of them or do not feel confident to raise concerns or know whom to report them to, the policies will be ineffective. A positive child safeguarding culture needs to be led and role-modelled by senior management and reinforced by a clear internal training and communication strategy.

When a company faces significant child safeguarding risks, targeted training should be conducted in addition to the general awareness-raising programme. In particular, employees who have regular direct or indirect contact with children should be provided with

Our company has a zero-tolerance policy when it comes to child abuse.

How do you know if a child is in danger?

Is a colleague or partner:
- Seeking to spend time alone with a child?
- Acting inappropriately towards a child?
- Physically or sexually abusing a child?

Do you have a concern about the safety of a child?

If so, please report the incident to your line manager or through the ethics line **IMMEDIATELY**

Child Safeguarding incident reported to the ethics line

Set up a case file

Could the incident possible be a criminal offense?

Refer immediately to police

Cooperate with the investigation and maintain a case file as appropriate

Does the incident require external support (e.g. NGO or social worker?)

Make appropriate referral and continue to monitor

Deal with incident in line with corporate policy

Provide an incident report

in-depth training on child safeguarding. These employees are typically front-line employees who engage directly with children, including airline stewards, retail associates, hotel employees, security personnel, fast-food workers or amusement park employees.

Frequently, these employees are responsible for taking special care of children's well-being (e.g., airline stewards caring for children who are travelling alone). Targeted training aims to ensure that they understand how their work could impact the safety and well-being of children; know how to act responsibly around children; and are prepared to make a report if they are concerned that a child may be at risk. All of these factors are essential to upholding a company's child safeguarding commitment.

Targeted training sessions should be designed to provide in-depth detail on specific risks related to the business unit as well as specific actions employees should take to mitigate risks. Each training module should include:

- **Information about the child safeguarding policy and related policies and procedures**
  Introduction to the policy and its content, where to find the policy and other relevant documents and who to turn to in case of questions related to the policy, e.g., the child safeguarding focal point.

- **Relevance of child safeguarding to the company**
  The training should be informed by a list of child safeguarding risks identified during Step 1, with a special focus on the risks related to the specific business unit or position. Clear examples or scenarios of actual risks faced by the company should be included.

- **Employee responsibilities**
  Outline the specific actions employees should take to meet their responsibility to safeguard children as well as the consequences of non-compliance. This may include presenting child rights dilemmas and outlining how employees should react in each scenario. Linking examples to issues employees face in their everyday work is an efficient way of engaging staff and raising employee awareness levels.

- **A clearly defined reporting process**
  Provide information on how employees can raise potential concerns regarding child safeguarding, and how those concerns are reviewed and taken forward. The training should include guidance on how to react if a child reports a concern directly to an employee.

- **Guidance for spotting risks**
  To support staff in spotting risks, or 'red flags', communications/training should include guidance on factors that increase children's vulnerability (gender, age, disabilities), and information on potential perpetrators of abuse (e.g., how sexual offenders groom children online).

Red flags include but are not limited to witnessing or hearing an inappropriate interaction between an adult and a child; knowing of someone who is accessing or sharing child sexual abuse images; seeing an employee use physical force with a child; and hearing an employee demean or degrade a child. In some cases, a potential abuse situation is revealed by a child showing signs of neglect, such as withdrawn behaviour or exhibiting inappropriately sexualized behaviour. Most children who experience abuse do not ask for help, so a disclosure from a child must be approached with a heightened awareness and responsiveness.

In accordance with the company's zero-tolerance policy, all employees should be guided to report all abuse-related situations that are witnessed or suspected, including bullying, verbal abuse or insults. Underscore that one-time incidents, oversights or bad judgement calls (e.g., an employee being alone with a child or making an inappropriate remark) should be addressed to avoid these poor practices recurring and becoming ingrained in the corporate culture.

Companies conducting targeted training should invest in dynamic and actionable training for their employees and, in some cases, business partners. Whether it is a combination of an e-learning programme, face-to-face training, online quizzes or other platforms, ensuring that the training fits the corporate culture and relates to the company's child safeguarding risks will help ensure its success. Because issues related to child safeguarding, child protection and child abuse are sensitive in nature and have different implications in different cultural contexts, in-person training and face-to-face discussions should always be part of targeted training programmes.

Sample scenarios are useful tools to illuminate child safeguarding risks facing a company. This is especially the case for risks that may be more common but less understood. A few examples of these dilemmas are presented in the table on the following page.

Step 4

Create and roll out an implementation plan

Sample scenarios for training materials

DILEMMA	IS THIS A SAFEGUARDING RISK?
A company employee engages with a 15-year-old girl on the company's consumer-facing online forum. She has some great ideas, so he invites her to have a private video call.	While the staff member may genuinely wish to discuss the girl's ideas, there is potential here for developing a personal relationship and abusing the employee's position of power. Further, the staff member's actions cannot be accounted for and might be misconstrued.
A staff member downloads child sexual abuse images on his or her computer.	Viewing or possessing child sexual abuse images is considered child abuse. Moreover, in many countries, it is a criminal offence.
A company employee hosts groups of students on a study visit as part of a work-life excursion, and is repeatedly telling discriminatory jokes about sexual orientation to the students.	Making jokes or using inappropriate language about certain characteristics of a person – including age, gender, ability, culture, racial origin, religious belief or sexual identity – is discriminatory and can convey a message to a child or a young adult that she or he is worthless or inadequate. When such jokes are told repeatedly, this is classified as emotional abuse. It is important to nourish a corporate culture in which discriminatory humour is not accepted.
During an overseas business trip, an employee joins a business partner for a drink at a nearby bar. At the bar, the employee is approached by young persons (about 16 years old) offering sexual liaison.	Engaging in commercial sexual activity with a child is sexual exploitation and is a criminal offence in many countries. In cases where national legislation and international standards conflict, it is strongly recommended to prioritize the international standard.
A theme park employee invites a 15-year-old boy to meet after the workday ends.	This is a safeguarding risk because it provides an opportunity for the employee to be alone with the child. Further, the employee's actions cannot be accounted for and might be misconstrued.

SCENARIO: CHILD ONLINE SAFETY AS A FOCUS OF AWARENESS RAISING AND TRAINING

While developing its safeguarding policy, a global consumer-goods company with a growing online portfolio of products and services for children conducted a company-wide child online safety assessment. This revealed the need to go beyond compliance to more broadly address the business impact on children's rights and safety by developing a child online safety policy.

The policy included information on the potential risks for children, ranging from issues such as inappropriate contact, conduct or content to data privacy and data collection breaches. It also covered how the company was addressing these risks. Following the launch of the policy, processes have been implemented to ensure children and their data are protected while using the company's online products. By using automatically generated screen names and avatar profile images, for example, children are able to engage in online communities without sharing their personal identifiable information.

To raise awareness among staff, a child online safety e-learning programme was rolled out, with more than 95 per cent of all employees completing this by the end of the first year. In addition, face-to-face training sessions were conducted for high-risk employees and business units across different countries.

Child online safety is also considered as an integral part of the company's online product development process, bringing together employees from product design, marketing, sustainability, compliance and legal departments. An essential part of raising awareness on the issue is working together with other companies in multi-stakeholder working groups to advance the regulatory environment, and share good practices and lessons learned on a global scale.

Annex III of this toolkit offers a checklist for corporate child online safety policies.

Step 5
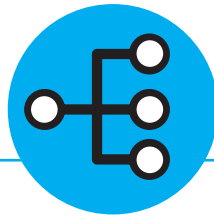
Establish a reporting structure to process concerns

This toolkit provides guidance for companies on how to minimize the potential for child abuse as a result of direct or indirect contact with company employees or representatives. But even in cases where robust safeguarding mechanisms are in place, abuses may occur. When a company's child safeguarding programme is successful, the number of reported concerns is likely to increase.

Given this, it is essential that a company highlights the most important message for all employees: **Any concerns that arise should always be reported, without placing the employee in a position of deciding whether or not an abuse has taken place**. What matters is that the concern is passed on to the right person so that action can be taken to protect the child from harm.

All staff members need to know who their designated safeguarding lead is and that this person has a duty to escalate concerns. The company should also institute a clear mechanism for individuals to report actual and potential concerns and communicate the structure for processing allegations, including:

• When there is a concern about a child, what is the initial response required from an employee, and what is the organizational response to taking that concern forward?

• Who is responsible for receiving the reported concerns and the actions taken after receiving a report?

• What are the overarching principles behind the reporting system – safety, anonymity, confidentiality, fairness?

The most effective reporting structures build on existing company mechanisms such as whistle-blowing policies. If the business is developing robust governance mechanisms for child safeguarding, it might be appropriate to develop a stand-alone reporting structure. Either way, it is essential that the designated child safeguarding focal points are trained in processing claims related to child safeguarding risks.

This includes guidance on how to process the reports as well as when and how to refer concerns to external agencies or involve local authorities. In some contexts, for example, contacting the police or local authorities when there is a concern that a crime has been committed might place the child at increased risk of harm. These questions can help clarify when and how local authorities should be engaged:

• If engaging with the local authorities, is there any risk that this might have a more negative impact on the child's safety and well-being than not reporting to them?

• If the answer is yes, which other actor (e.g., a local non-governmental organization) would be capable and trustworthy to take the matter forward?

The company should always prioritize the protection of the child, while considering its legal obligations and its responsibilities to staff. To support this process, it can be useful to establish a relationship with a local non-governmental organization that works on child protection issues, so they can help with advice and referrals to support services.

When it comes to processing the concern, the focus should always be on the child's immediate well-being. This includes communicating with the child in a way that is supportive and understanding *(see box on the following page)*. As with other types of incidents, child safeguarding concerns should be processed in a fair and transparent way that prioritizes the confidentiality of those involved. Always make it clear that all information will be handled confidentially and only shared where the duty to protect a child from harm supersedes an individual's right to privacy.

RESPONDING TO A CHILD'S CONCERN

Most children who experience abuse do not ask for help, and children's disclosures must always be taken seriously. Most importantly, the employee should immediately contact emergency services if the child is in immediate danger, or report it to the child safeguarding focal point for follow up if the child is not in immediate danger.

If a child suggests they want to tell an employee a 'secret' or disclose information that suggests they are at risk or have been abused, it is important that the employee:

• Remains calm and does not show shock or disbelief.
• Listens carefully to what is being said and offers comfort statements,
  particularly when a child discloses sexual abuse, for example,
  "I'm sorry this happened to you", "It's not your fault."
• Does not ask detailed, probing or leading questions.
• Tells the child that they will take what is said seriously.
• Explains what they are going to do. (Depending on the child's age, this would include
  asking what type of help is wanted, and who the child feels comfortable having involved.)
• Tells the child that they are cannot keep a secret that could cause harm, but the information
  will only be shared in order to keep them safe.

One source of additional guidance is *Caring for Child Survivors of Sexual Abuse in Humanitarian Settings*, a report by the International Rescue Committee and UNICEF, <www.unicefinemer-gencies.com/downloads/eresource/docs/GBV/Caring for Child Survivors Humanitarian Settings Aug 2011.pdf>.

Step 6

Take action when a concern is raised

This step involves the concrete actions that a company should take after a concern of a child's safety or well-being has been raised. The concern can be raised either through the company's existing whistle-blowing mechanism or through a separate reporting structure for safeguarding concerns – but it is of paramount importance to have a structure in place for employees and other stakeholders to report potential concerns, as well as ensure necessary remediation procedures when a concern is raised. The figure below illustrates how employees could report a concern.

Reporting safeguarding concerns – flow chart for employees

You have a safeguarding concern about a child.
Does the child need urgent medical or police attention?

YES

Contact emergency services immediately.
Then contact the designated safeguarding person.

NO

Liaise with the designated safeguarding person, who will advise you on action to take.

- Local emergency services number: _____

- Designated safeguarding lead: _____

- In their absence, contact: _____

Essential preparatory steps for implementing the safeguarding programme within the company include the following:

1. Make sure that all employees understand the role of the designated safeguarding lead, and know who this person is and how to contact him or her. The company also needs to designate a deputy lead to be available if the designated lead is absent.

2. Contact the relevant local agencies and organizations and keep a directory of all contact information readily available should the safeguarding lead need to pass concerns on. At minimum, this should include the police, other statutory agencies (e.g., social services), relevant charities and support organizations, and information on how to contact country embassies.

3. Ensure there is an internal system in place for making safeguarding decisions (referred to as the 'safeguarding committee' in this toolkit). The committee needs to include individuals who can support the safeguarding lead in making decisions about the best course of action for any incidents as they arise. The group should include senior personnel (e.g., the line manager) and have access to legal advice when it is needed. A contingency plan should be in place for situations where allegations or concerns involve someone from the safeguarding committee (e.g., protecting the identify of the person who reported).

4. Develop a standard safeguarding incident form (or equivalent) for recording the details of any concerns raised, and a system for storing this form securely and confidentially. When relevant, ensure there are also policies for unattended and missing children to manage these types of incidents.

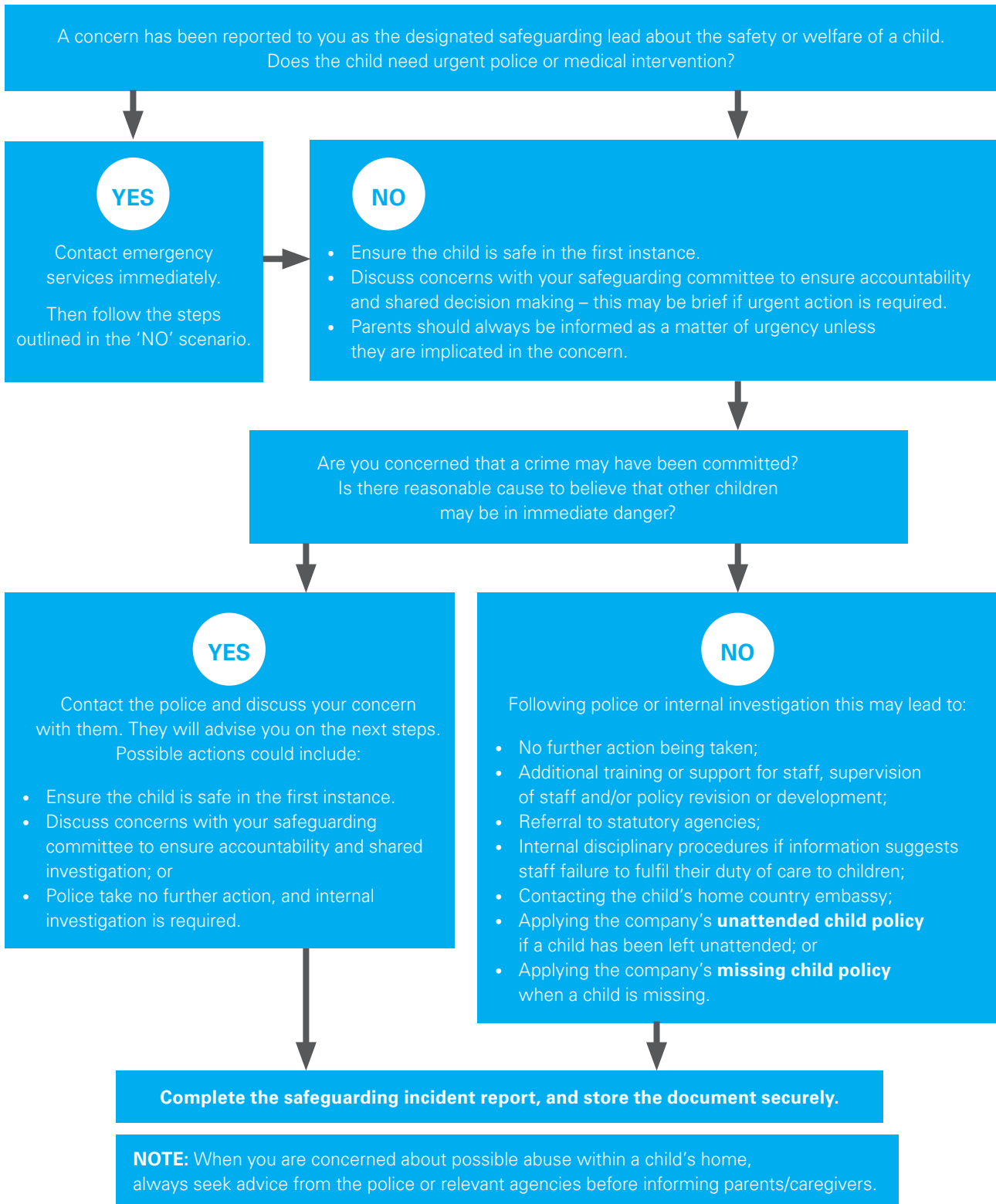Safeguarding concerns may arise and be reported to the safeguarding focal point in a variety of ways, including a report by a colleague or a member of the public, information coming to light through safe recruitment processes, or statutory agencies making contact as part of an ongoing investigation. The following flow chart offers an overview of steps to take and decisions to make after a concern is raised.

Step 6

Take action when a concern is raised

Action steps for the designated safeguarding lead after a concern is raised

A concern has been reported to you as the designated safeguarding lead about the safety or welfare of a child. Does the child need urgent police or medical intervention?

YES

Contact emergency services immediately.

Then follow the steps outlined in the 'NO' scenario.

NO

- Ensure the child is safe in the first instance.
- Discuss concerns with your safeguarding committee to ensure accountability and shared decision making – this may be brief if urgent action is required.
- Parents should always be informed as a matter of urgency unless they are implicated in the concern.

Are you concerned that a crime may have been committed? Is there reasonable cause to believe that other children may be in immediate danger?

YES

Contact the police and discuss your concern with them. They will advise you on the next steps. Possible actions could include:

- Ensure the child is safe in the first instance.
- Discuss concerns with your safeguarding committee to ensure accountability and shared investigation; or
- Police take no further action, and internal investigation is required.

NO

Following police or internal investigation this may lead to:

- No further action being taken;
- Additional training or support for staff, supervision of staff and/or policy revision or development;
- Referral to statutory agencies;
- Internal disciplinary procedures if information suggests staff failure to fulfil their duty of care to children;
- Contacting the child's home country embassy;
- Applying the company's **unattended child policy** if a child has been left unattended; or
- Applying the company's **missing child policy** when a child is missing.

Complete the safeguarding incident report, and store the document securely.

NOTE: When you are concerned about possible abuse within a child's home, always seek advice from the police or relevant agencies before informing parents/caregivers.

In all cases, it is important to remember that it is not the responsibility of the designated safeguarding lead or any other employee to decide whether or not abuse has taken place – their responsibility is to report information to appropriate agencies so that concerns can be investigated. The welfare of the child or children involved must be the overarching consideration at all times. *(For additional guidance for the designated safeguarding lead, see Annex IV.)*

Whenever an incident occurs, a safeguarding incident form must be completed and stored securely. All companies should monitor their performance in fulfilling their commitment to child safeguarding, for example, tracking the number of concerns received and processed.

The establishment and implementation of child safeguarding policies and procedures is likely to raise the number of reports since employees are more aware of the issues and know whom to contact in cases of concern.

Successful child safeguarding in business operations and work practices is an ongoing journey that involves continuous review and revision of policies and implementation. At the heart of the effort is a company culture that identifies child safeguarding as a business priority and recognizes that the responsibility of translating child safeguarding policies into practice lies with every single employee and business partner.

Annex I. Child safeguarding risk assessment template

Type of activity – direct or indirect	Relevant? (Yes or No)	Level of risk? (High, Medium, Low)	Which adults are involved in this activity?			Which adults have direct responsibility for supervising the children during this activity?				What guides your practice in this area?		
			Company employees, interns or volunteers (specify business unit and for direct contact)	Company contractors (specify which ones)	Company business partners (specify which ones)	Primary or proxy caregiver (e.g., parent, guardian, teacher)	Company staff	Company representatives	Other	Written policy, procedure or guideline (provide name of the policy and link to it)	Unwritten procedures	No policies, procedures, or good practice
1. Carrying out direct sales to children												
2. Travelling on behalf of the company to places where child sexual exploitation is a concern.												
3. Conducting marketing activities that require engagement with children.												
4. Interacting with children, who live in or near the company premises.												
5. Volunteering with child charities on behalf of the company												
6. Providing care for the child/ young person.												
7. Providing an 'immersive experience' for children/young people												
8. Communicating with children/ young people through online platforms.												
9. Having access to sensitive child data.												
10. Other												

Annex II. Gap analysis template

Legal and regulatory statutes Companies should ask: *What are the legal requirements with respect to child protection in the countries in which we operate?*			
	Legal requirements (list relevant laws)	Regulatory requirements (list relevant statutes)	Is the company in compliance with these requirements?
Country A:			
Country B:			
Country C:			
Management practices Companies should ask: *How are we ensuring that we are meeting our safeguarding responsibilities in practice?*			
Governance	Does the company have a governance structure to manage the company's approach to child safeguarding?		
	How is safeguarding owned and understood at the senior leadership level within the organization?		
Policy	Does the company have a stand-alone child safeguarding policy?		
	Does the company include child safeguarding practices in its employee or vendor code of conduct?		
	What expectations regarding child safeguarding are place on business partners?		
Management	Does the company take adequate measures to ensure safe recruitment practices, e.g., conducting background checks[15] for all employees who will have direct or indirect engagement with children?		
	Does the company provide training on child safeguarding to all employees and additional content for employees or partners who have direct and indirect contact with children as part of their typical responsibilities?		
	Does the company have a process to report and respond to child safeguarding concerns raised by employees and third parties?		

[15] The process and legal requirements of acquiring a criminal record check vary by country. Additional information on the criminal record certificate requirements of different countries can be found at: <www.gov.uk/government/publications/criminal-records-checks-for-overseas-applicants>.

Annex III. Child online safety policy checklist

When a separate policy commitment for children's online protection is needed, companies should seek to include the items outlined in this checklist.

POLICY ITEM	DESCRIPTION OF CORPORATE COMMITMENT	✔
Statement of commitment	Outline why child online safety is important to the company and the purpose of the policy (e.g., to prevent, respond to and resolve any potential risks to children's safety when using the company's digital products and services; strengthening governance and accountability). Describe how the company will meet this commitment. This could include referencing corporate values, national laws, international human rights standards and other child online safety standards (e.g., Guidelines for Industry on Child Online Protection,[16] Children's Online Privacy Protection Act[17]) and taking a proactive approach to managing risk.	☐
Risks related to child online safety	In broad terms, outline the ways in which the company through its employees or partners and digital products and services can pose a risk to children's safety in the online environment – both directly and indirectly – as determined through the risk assessment. It is important to provide tangible examples for employees and partners to fully grasp risks. These risks may include but are not limited to inappropriate or harmful contact, conduct or content, child sexual abuse content, illegal content, data privacy and data collection breaches.	☐
Definitions	To ensure a common understanding, the commitment should always include the following definition: **A child** is defined as any individual under age 18, irrespective of local country definitions of when a child reaches adulthood. With regard to different types of risks, they may be defined as relevant to the particular company, for example: • **Child online sexual abuse** – recorded images, video and streaming of children subjected to sexual abuse and exploitation; • **Inappropriate content** – harmful, age-sensitive or illegal content, such as pornography, substance abuse, hate speech, or the promotion of suicide, anorexia or violence; • **Inappropriate conduct** – harassment or exploitation of other people online, cyberbullying, trolling, stealing content or infringing on copyrights; • **Inappropriate contact** – cyberbullying, grooming; and • **Commercial engagement** – responsible data collection and online privacy, digital advertising, subscription terms, in-game purchases, etc.	☐

continues on the next page

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[16] International Telecommunication Union and United Nations Children's Fund, 'Guidelines for Industry on Child Online Protection', ITU and UNICEF, 2015, open PDF from <www.unicef.org/csr/files/COP_Guidelines_English.pdf>
[17] Federal Trade Commission, 'Title XIII – Children's Online Privacy Protection', Washington, D.C., 1998, <www.coppa.org/coppa.htm>.

Annex III. Child online safety policy checklist

POLICY ITEM	DESCRIPTION OF CORPORATE COMMITMENT	✔
Key principles and implementation processes	State and explain the key processes the company will implement in order to mitigate relevant risks and comply with the policy. Explain any links to other relevant policies and procedures (e.g., child safeguarding, data protection and marketing policies; code of ethical conduct) and clarify the protocol if there is a conflict between the current industry standards, national regulations or the company policy. In these situations, it is recommended that the company complies with the strictest standard. In addition to the implementation guidance provided in this toolkit, online safety measures might include: • Labelling or gating content that is not appropriate for children; • Putting parental controls in place and offering contextual guidance to parents on how to use such tools respectfully and responsibly while not inflicting a child's right to access to information or participation; • Providing guidance on how to deal with abuse or misuse, such as reporting tools, 'house rules', the go-to employees who are trained to intervene and can provide links to external agencies (e.g., child helplines) as appropriate; • Guidance on dealing with child sexual abuse content or illegal content, including notice and takedown processes; • Data privacy and protection measures, e.g., on sharing and storing personal information; and • Offering online safety awareness guidance to parents and children.	☐
Applicability of commitment and acknowledgment of the duty of care	Clarify that the commitment covers all employees and other actors acting on behalf of the company, and applies to all aspects of the company's online operations where children are potentially impacted. Reinforce that respecting children's digital rights is everyone's responsibility and that everyone covered is required to adhere to the commitment. Include information on the consequences associated with a breach of commitment, e.g., penalties, fines or employment-related actions.	☐
Governance structure	Name the function or individual within the company that has ultimate responsibility for implementation of the commitment, as well as the 'corporate sponsor' or executive assigned to oversee the commitment.	☐
Reporting structure	Outline the process for internal and external stakeholders to raise concerns regarding the safety of children in relation to company operations; this is typically the phone number or email of the person or function responsible for receiving concerns, and often made available as part of the existing company whistle-blower mechanisms.	☐
CEO or chairman of the board approval	The commitment should be signed off at the highest level of management, for example, by the CEO or chairman of the board. Not only does the signature of top management align with external stakeholder expectations, but it also signals to employees and partners the commitment's importance to the company. Key messages around expectations for keeping children safe should be regularly emphasized by senior management after the launch of the commitment.	☐

Annex IV. Guidance for the designated child safeguarding lead

When you receive a safeguarding concern and immediate medical or police attention is required:

- Do not delay in contacting the appropriate medical or law-enforcement agencies to report your concern – inform them first, before parents or anyone else. Any delay in getting emergency help to the child could cause further harm. These agencies will advise you about the immediate next steps.
- In most countries, it is appropriate to contact the police when you are concerned that a crime has been committed. However, there may be some rare contexts where contacting the police would place the child at increased risk of harm. This must be decided at the local level, and you will need to determine which agency would be most appropriate to contact if you are advised against contacting the police in the first instance. It will be important to have previously addressed this item in the company policy and guidelines for the designated child safeguarding lead.

When immediate emergency assistance is not required:

- Ensure the child is safe and supported. If there is direct contact with the child, ensure that he or she is as comfortable as possible, for example, offer a glass of water, and a private/quiet place to sit. Be sure that the child is not left alone.
- Contact parents as soon as possible, unless they are implicated in involvement with the incident. In the case of possible parent/caregiver involvement, take advice from legal agencies on when to make contact with them.
- Attempt to minimize the number of strangers the child must interact with and the number of times she or he is asked to retell the details of the incident.
- When a police investigation is required, the legal investigation will take precedence over any internal company enquiries. After contacting the police, take their advice on whether and how to proceed with an internal investigation.

When internal or partner staff are implicated in the concern:

- Children's welfare must take precedence over all other considerations.
- Depending on the seriousness of the concern and the potential for other children to be harmed, it may be appropriate to temporarily suspend a staff member or partnership while an investigation is carried out. The safeguarding committee should make the decision to suspend, making sure the concern has reached the threshold for taking this action and there is corporate responsibility for this decision.
- Plan how and when to communicate the situation to other staff members and potential external stakeholders. In situations affecting the entire organization, ensure timely and transparent communication/information on the incident and how it is handled.

Possible outcomes of investigations:

- When the concern is quickly resolved and staff are not implicated – for example, a child was thought to be missing and is quickly found – the outcome would be 'no further action required'. This should nonetheless be recorded on a safeguarding incident form and stored securely.
- Investigations may lead to staff being identified as requiring additional training, support or supervision and/or may lead to the development of additional safeguarding policies or guidance.
- As an internal investigation progresses, information may come to light that increases the level of concern and may lead to a subsequent referral to statutory agencies.
- Internal investigations may also lead to disciplinary action or termination of a partnership when there is concern that staff have failed in their duty of care to children or to fulfil the requirements of their role. Safeguarding should be clearly referenced in disciplinary and appeals processes, and these processes should be cross-referenced in safeguarding policies.
- When a serious incident has occurred involving a child who is not in their home country (e.g., while on holiday), and you are concerned that further intervention may be required when they get home, you should contact their country's embassy and report your concern.

For every incident that occurs, a safeguarding incident form or equivalent must be completed and stored securely and confidentially.