



Addressing Child Safeguarding *in the* Private Sector



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ACRONYMS

CRBP Children's Rights and Business Principles

CSA Child Sexual Abuse

CSAM Child Sexual Abuse Material
CSR Corporate Social Responsibility

E&S Environmental and Social

ESG Environmental and Social Due Diligence
ESG Environmental, Social and Governance

ESIA Environmental and Social Impact Assessment
ESMS Environmental and Social Management System

FP Focal Point

GBV Gender-based Violence
GPN Good Practice Note
HR Human Resources

ICT Information and Communication Technology

IFC International Finance Cooperation
ILO International Labour Organization

KPI Key Performance Indicator

LGBTQI Lesbian, Gay, Bisexual, Transgender, Queer/Questioning and Intersex

PS Performance Standard

SEAH Sexual Exploitation, Abuse and Sexual Harassment

UN United Nations

UNCRC United Nations Convention on the Rights of the Child, 1989

UNGP United Nations Guiding Principles on Business and Human Rights

WHO World Health Organization

GLOSSARY

Term	Definition
Adolescent	The World Health Organization (WHO) defines adolescents as ages 10 to 19 years. The phase is typically subdivided into early adolescence (10–14 years old) and late adolescence (15–19), to account for the different milestones and states of maturity that separate younger and older adolescents. ¹
Allegation	A child safeguarding allegation is a complaint involving one or more perpetrators and one or more children. When investigating an allegation, it can be difficult to distinguish child abuse or a harmful practice from a culture of poor practice that has developed over time. This difficulty may reflect the individual style of management, the staff group, many of whom may have been there a long time, and/or local practices that are deemed acceptable. ²
'Best interests' (of the child)	'The term'best interests' broadly describes the well-being of a child. As each case is unique, a general definition of what is in the best interests of the child cannot be given. The 'best interests' of the child need to be examined on an individual basis, taking into account the specific features of each case.' According to Article 3 of the United Nations (UN) Convention on the Rights of the Child, 1989, when adults make decisions, they should think about how they affect children and do what is best for them. This is the essence of the 1959 UN declaration that the child shall enjoy special protection and shall be given opportunities and facilities by law and by other means, to enable them to develop physically, mentally, spiritually, and socially in a healthy and normal manner and in conditions of freedom and dignity.
Bullying	Bullying is unwanted, aggressive behavior that involves a real or perceived power imbalance. It can be a one-off incident, but it is often repeated over time and can be physical, verbal, psychological, online, or indirect. The actions and behavior of a bully include seeking to harm, intimidate, or coerce someone who is vulnerable. In the child safeguarding context, the word 'bullying' usually refers to a peer-to-peer relationship between two or more children.
Case	A situation where concerns about a child's safety and well-being are identified and addressed. ⁵
Case management	A systematic process in which a trained and supervised caseworker assesses the needs of a client (the child) and, when appropriate, the client's family. He or she then arranges, and sometimes provides, coordinates, monitors, evaluates, and advocates for a package of multiple services to meet the specific client's complex needs. ⁶

World Health Organization. Adolescent health (who.int)

² Keeping Children Safe (2016). <u>Management of Child Safeguarding Allegations</u>, p. 6.

³ UNHCR (2017). <u>Children – Protection and Care Information Sheet</u>, p.1.

 $^{^{4}\}quad \text{Online guidance from US Government. } \underline{\textbf{Stopbullying.gov}}$

⁵ International Rescue Committee (2024). <u>Child Protection Case Management</u>.

⁶ National Association of Case Workers (2013), <u>NASW Standards for Social Work Case Management</u>, p.13.

Term	Definition
Child	Article 1 of the United Nations (UN) Convention on the Rights of the Child, 1989, defines children as those under the age of 18 years, regardless of the age of majority or age of consent locally. ⁷
Child abuse	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.8
Child labor	Work that is harmful to the child's health or physical, mental, spiritual, moral, or social development. PLO Conventions No. 138 and No. 182 define child labor as work that deprives children of their childhood, their potential and their dignity, and that is harmful to their physical or mental development including by interfering with their education; by depriving them of the opportunity to attend school; obliging them to leave school prematurely; or requiring them to attempt to combine school attendance with excessively long and heavy work.
Child protection	Child protection focuses on protecting children in families and in communities from harm. Child protection encompasses national policy, laws, and social welfare systems (and other allied systems such as education and health) to prevent and respond to child abuse. Responsibilities are often spread across government agencies, with services delivered by local authorities, non-State providers, and community groups.
Child safeguarding	The responsibility that an organization has to make sure its staff, operations, and programs do no harm to children, meaning that they do not expose children to the risk of harm and abuse, and that any concern an organization has about children's safety within the communities in which it operates are reported to the appropriate authorities. ¹⁰
	Child safeguarding refers to all the actions that organizations can take to keep safe all children with whom the organization may come into contact. Child safeguarding involves prevention, mitigation, reporting, and response. It encompasses the policies, procedures and practices employed to safeguard children who come into contact with an organization from unintended harm including all forms of abuse, and the responsibility of all personnel to embed these at the activity/implementation level to ensure a child-safe organization."
Child sexual abuse	Any form of sexual activity, physical or not, with a child, perpetrated by an adult or by another child who has power over the child. In these contexts, all forms of sexual activity with a child are considered as sexual abuse. Child sexual abuse often involves body contact, but not always. Sexual abuse is not only penetrative—it includes contact or noncontact forms of sexual abuse. Contact abuse is where an abuser makes physical contact with any part of a child's body or forces the child to make physical contact with someone else. Noncontact abuse is where a child is abused without being touched and includes exposing or flashing, and voyeurism, as well as making, viewing, or distributing child abuse images or videos.

⁷ United Nations (1989). <u>Convention on the Rights of the Child</u>.

⁸ UNICEF (2018). Child safeguarding toolkit for business. A step-by-step guide to identifying and preventing risks to children who interact with your business. p. 7.

⁹ IFC (2012). <u>Performance Standard 2: Labor and Working Conditions</u>, para 21.

 $^{^{10}}$ Keeping Children Safe (KCS). <u>The International Child Safeguarding Standards</u>, p. 5.

UNICEF (2018). Child safeguarding toolkit for business. A step-by-step guide to identifying and preventing risks to children who interact with your business.

¹² UNICEF (2024). Caring for Child Survivors of Sexual Abuse Guidelines.

Term	Definition
Child sexual exploitation	A form of sexual abuse that involves children being engaged in any sexual activity by someone in a position of power and often involves the exchange of money, gifts, food, accommodation, affection, status, or anything else that the child (or the child's family) needs, including employment. It usually involves a child being manipulated or coerced, which may involve befriending children, gaining their trust, and giving them drugs and alcohol. The abusive relationship between victim and perpetrator involves an imbalance of power where the victim's options are limited. It is a form of abuse that can be misunderstood by children and adults as consensual. ¹³
Child sexual exploitation and abuse material (CSAM)	Whereas many jurisdictions still refer to images and videos of child sexual abuse as "child pornography" or "indecent images of children," these Guidelines use the single term "child sexual abuse material" (CSAM), in alignment with the ITU/UNESCO Broadband Commission for Sustainable Development Guidelines and the Weprotect Global Alliance's Model National Response which provide guidance on establishing response to online child sexual exploitation and abuse. 14
Commercial exploitation	Exploiting a child through work or other activities for the benefit of others and to the detriment of the child's physical or mental health, education, moral or social-emotional development. It includes, but is not limited to, child labor, child trafficking, child sexual exploitation, illegal adoption, and the production of child sexual abuse materials for online publication. ¹⁵
Confidentiality	An ethical principle that restricts access to and dissemination of information. In investigations on sexual exploitation and abuse, for example, or fraud and corruption, it requires that information is available only to a limited number of authorized people for the purpose of conducting the investigation. Confidentiality helps create an environment in which witnesses are more willing to recount their versions of events and builds trust in the system and in the organization. ¹⁶ It also protects those involved from retribution.
Do No Harm	Minimizing or avoiding harmful outcomes of actions taken by businesses in the course of their work. The 'do no harm' principle is particularly important when working with children and vulnerable population groups: businesses must ensure that their operations do not inadvertently cause harm or worsen pre-existing vulnerabilities. ¹⁷
Disclosure	The process of revealing information related to abuse experienced or perpetrated. Disclosure of abuse can be communicated directly or indirectly. The term disclosure is clearer than 'identification' when it indicates that the individual sharing details of an incident or concern has decided to discuss the incident with the organization. An individual who discloses abuse may become a complainant. A person may also disclose abuse of a third party by somebody else.

¹³ Keeping Children Safe (2022). <u>The International Child Safeguarding Standards</u>, p.6.

¹⁴ International Telecommunication Union (ITU) (2020). <u>Guidelines for Industry on Child Online Protection</u>.

 $^{^{15}}$ Keeping Children Safe (2022). <u>The International Child Safeguarding Standards</u>, p.6.

¹⁶ CHS Alliance (2017). <u>PSEA Implementation Quick Reference Handbook</u>, p. 1.

¹⁷ Keeping Children Safe (2022). <u>The International Child Safeguarding Standards</u>, p. 4.

Asian Development Bank (2023). Good Practice Note on Addressing Sexual Exploitation, Abuse and Harassment in ADB-Financed Projects with Civil Works, p.49

Term	Definition
Discrimination	Treating a person or group of people less favorably than another person or group based on protected characteristics. ¹⁹ For this guidance note, protected characteristics include age, disability, gender identity, marriage and civil partnerships, pregnancy and maternity, ethnic identity, race, religion or belief, sex, sexual orientation, perceived or actual class status, education background, trade union membership or affiliation, political beliefs, and nationality. This is not an exhaustive list. ²⁰
Duty of care	A legal or moral obligation requiring adherence to a standard of reasonable care to prevent foreseeable harm. ²¹
Emotional abuse	Persistent emotional maltreatment that impacts on a child's emotional development. Emotionally abusive acts include restriction of movement, degrading, humiliating, bullying (including cyberbullying), and threatening, scaring, discriminating, ridiculing or other nonphysical forms of hostile or rejecting treatment. ²²
Forced labor	Forced labor is any work or service not voluntarily performed that occurs under threat of force or penalty. It includes any kind of involuntary or compulsory labor, such as indentured labor, bonded labor or similar labor arrangements, slavery, and slavery-like practices. ²³
Gender-based violence (GBV)	An umbrella term for violence directed toward or disproportionately affecting someone because of their actual or perceived gender identity. The term 'gender-based violence' is primarily used to underscore the fact that structural, gender-based power differentials around the world place women and girls at risk for multiple forms of violence. This includes acts that inflict physical, sexual, or mental harm or suffering, threats of such acts, coercion, and other deprivations of liberty, whether occurring in public or in private life. While women and girls suffer disproportionately from gender-based violence (GBV), men and boys can also be targeted. The term is also used by some actors to describe targeted violence against lesbian, gay, bisexual, transgender, and intersex (LGBTI) populations—with reference to violence linked to norms of masculinity/femininity and/or gender norms. ²⁴
Grievance mechanism	Processes that can be used by workers, community members and service users to make complaints or report concerns. 25 Grievance mechanisms specifically for child safeguarding are typically referred to as Reporting Mechanisms.
Informed consent	 Consent is when a person makes an informed choice to agree freely and voluntarily to do something. There is no consent when agreement is obtained through: The use of threats, force, or other forms of coercion, abduction, fraud, manipulation, deception, or misrepresentation. The use of a threat to withhold a benefit to which the person is already entitled; or A promise made to a person to provide a benefit.²⁶ In relation to children, a child's capacity to consent is related to their developmental capacity and ability to understand the implications of decisions made.

¹⁹ Government of the United Kingdom (2010). **Equality Act 2010**.

²⁰ ADB (2023). Good Practice Note on Addressing Sexual Exploitation, Abuse and Harassment in ADB-Financed Projects with Civil Works, p.49

²¹ IFC, European Bank for Reconstruction and Development (EBRD), and CDC Group (2020). <u>Addressing Gender-Based Violence and Harassment: Emerging Good Practice for the Private Sector</u>, p. 8.

 $^{^{22}}$ Keeping Children Safe (2022). <u>The International Child Safeguarding Standards</u>, p.6.

²³ International Labour Organization (1930). *Forced Labour Convention 29* (Article 2).

²⁴ UN (2017). Glossary on Sexual Exploitation and Abuse. 2nd edition, p.9.

²⁵ IFC, EBRD, CDC (2020). <u>Addressing Gender-Based Violence and Harassment: Emerging Good Practice for the Private Sector</u>, p. 8.

²⁶ ADB (2023). Good Practice Note on Addressing Sexual Exploitation, Abuse and Harassment in ADB-Financed Projects with Civil Works.

Term	Definition
Investigator	An individual who is authorized and responsible to investigate a child safeguarding (or child protection) concern. ²⁷ Such an 'investigator' may be part of the government child protection system or a trained third party. Local national laws will establish who is permitted to carry out investigations and under what circumstances, and any procedures that must be followed. Businesses must comply with those laws.
Mandatory reporting	State laws and policies that require agencies or persons, typically teachers, social workers and health staff, to report actual or suspected child abuse (physical, sexual, neglect, emotional and psychological abuse, unlawful sexual intercourse). These requirements, if any, vary from place to place and depend on the context and nature of the concern.
Neglect	Neglect and negligent treatment refer to a persistent failure to meet a child's basic physical and/or psychological needs that is likely to result in serious impairment of a child's healthy physical, spiritual, moral, and mental development. It includes the failure to properly supervise and protect children from harm and provide for nutrition, shelter, and safe living/working conditions. ²⁹
Online abuse	Includes grooming or online bullying, exposure to inappropriate content or contact through, for example, online chatrooms or video games, or inadequate data protection. ³⁰
Online grooming	Online grooming refers to "the process of building a relationship with a child either in person or using the Internet or other digital technologies to facilitate either online or offline sexual contact with that person." It is the criminal activity of becoming friends with a child to try to persuade the child to have a sexual relationship. 31
Physical abuse	Actual or potential physical harm perpetrated by another person, adult, or child. It may involve hitting, shaking, poisoning, drowning, or burning. Physical harm may also be caused when a parent or carer fabricates the symptoms of or deliberately induces illness in a child. ³²
Safeguarding	The responsibility of an organization is to make sure that its staff, operations, and programs do no harm to children and adults at risk, and that they do not expose them to the risk of harm and abuse. ³³
Safeguarding against sexual exploitation, abuse, and sexual harassment (SEAH)	A set of actions an organization has in place to prevent SEAH from occurring; to protect people, especially vulnerable adults, and children, from sexual exploitation, sexual abuse, and sexual harassment; and to respond appropriately when harm does occur. ³⁴

 $^{^{27}}$ UN (2017). Glossary on Sexual Exploitation and Abuse. 2nd edition, p. 12.

²⁸ International Rescue Committee (2012). <u>Caring for Child Survivors of Child Sexual Abuse. Guidelines for health and psychosocial service providers in humanitarian settings</u>, 2nd edition.

 $^{^{29}\,}$ Keeping Children Safe (2022). $\underline{\textbf{The International Child Safeguarding Standards}}, p.6.$

³⁰ UNICEF (2018). Child safeguarding toolkit for business. A step-by-step guide to identifying and preventing risks to children who interact with your business, p. 6.

³¹ ITU (2020). <u>Guidelines for industry on Child Online Protection</u>, p. 60.

³² Keeping Children Safe (2022). <u>The International Child Safeguarding Standards</u>, p.6.

³³ CHS Alliance (2017). **PSEA Implementation Quick Reference Handbook**, p. 1.

³⁴ Safeguarding Resource and Support Hub. What is safeguarding?

Term	Definition
Sexual abuse	The actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. It includes sexual assault (attempted rape, kissing/touching, forcing someone to perform oral sex/touching) as well as rape. It may also include involving children in looking at, or producing sexual images, watching sexual activities, and encouraging children to behave in sexually inappropriate ways. Under many policies and national laws, any sexual activity with someone under the age of 18 is sexual abuse, regardless of the age of majority or consent locally. Mistaken belief in the age of a child is not a defense. ³⁵
Sexual exploitation	Any actual or attempted abuse of a position of vulnerability, differential power, or trust for sexual purposes. Includes profiting monetarily, socially, or politically from sexual exploitation of another. Under UN regulations it includes transactional sex, solicitation of transactional sex and exploitative relationships. ³⁶
Sexual harassment	A continuum of unacceptable and unwelcome behaviors and practices of a sexual nature that may include, but are not limited to, sexual suggestions or demands, requests for sexual favors and sexual, verbal, or physical conduct or gestures that are or might be perceived as offensive or humiliating. ³⁷
Survivor-centered approach	A survivor-centered approach is based on a set of principles and skills designed to guide professionals—regardless of their role—in their engagement with survivors (predominantly women and girls but also men, boys, and gender minorities) who have experienced sexual or other forms of violence. The survivor-centered approach aims to create a supportive environment in which the survivor's interests are respected and prioritized, and in which the survivor is treated with dignity and respect. The approach helps to promote the survivor's recovery and ability to identify and express needs and wishes, as well as to reinforce the survivor's capacity to make decisions about possible interventions (and non-intervention is one possible option). In cases involving children, the survivor-centered approach is guided by an assessment of the best interests of the child and is sometimes referred to as a 'child-centered' approach.
Trafficking	Trafficking in persons is defined as the recruitment, transportation, transfer, harboring, or receipt of persons, by means of the use of force or other forms of coercion, abduction, fraud, deception, abuse or power, or of a position of vulnerability, or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation. Women and children are especially vulnerable to trafficking. ³⁸
Victim or survivor	A child who has experienced abuse and/or exploitation. The terms 'victim' and 'survivor' can be used interchangeably, although 'victim' is generally used more in the legal and medical sectors, and 'survivor' in the psychological and social support sectors. For some children, 'victim' is a term they identify with or relate to in certain contexts. They may feel that it validates their experience by highlighting that a crime has been committed against them. Others may prefer the term 'survivor' because it acknowledges the abuse but focuses on overcoming as opposed to suffering. Others may not want a label attached to their experiences at all. ³⁹ 'Children who have experienced' is a more neutral term that can be used as an alternative to victim or survivor.

³⁵ Keeping Children Safe (2022). <u>The International Child Safeguarding Standards</u>, p.6 and Safeguarding Resource and Support Hub. <u>What is safeguarding?</u>

³⁶ Safeguarding Resource and Support Hub. <u>What is safeguarding?</u>

³⁷ As previous footnote.

³⁸ IFC (2012). **Performance Standard 2: Labor and Working Conditions**, para 22.

³⁹ NSPCC (2024). Why language matters: improving safeguarding and child protection practice with words.

Term	Definition
Violence	Defined by the World Health Organization as "the intentional use of physical force or power, threatened or actual, against oneself, another person, or against a group or community, that either results in or has a high likelihood of resulting in injury, death, psychological harm, maldevelopment, or deprivation".40
Violence against children	Violence against children (VAC) includes all forms of violence against people under 18 years old. For infants and younger children, violence involves child maltreatment (that is, physical, sexual, and emotional abuse and neglect) at the hands of parents, caregivers, or other authority figures. Boys and girls alike are at risk of physical and emotional abuse and neglect; girls are at greater risk of sexual abuse. As children reach adolescence, peer violence and intimate partner violence, in addition to child maltreatment, become highly prevalent. 41
Worst forms of child labor	 ILO Convention No. 182 identifies four categories of the worst forms of child labor:⁴² I. All forms of slavery or practices like slavery, such as the sale, trafficking of children, debt bondage and serfdom or compulsory labor, including forced or compulsory recruitment of children for use in armed conflict. II. The use, procuring or offering of a child for prostitution, to produce pornography or for pornographic performances. III. The use, procuring or offering of a child for illicit activities, for the production and trafficking of drugs as defined in the relevant international treaties. IV. Hazardous work which, by its nature or the circumstances in which it is carried out, is likely to harm the health, safety, or morals of children. According to this Convention, the precise nature of those tasks that are prohibited are to be defined and reviewed by each country.
Young worker	A person who has reached the minimum legal working age, usually 15 years (but under 18, therefore still a child). ⁴³

Disclaimer: The glossary does not have any legal effect and serves as a reference tool in connection with this guide.

 $^{^{40}}$ WHO. <u>The VPA Approach</u>.

⁴¹ WHO (2022). <u>Violence against children factsheet</u>.

⁴² International Labour Organization (1999). Convention C182 – Worst Forms of Child Labour Convention (No. 182).

 $^{^{43}\,}$ ILO (2020). Supplier guidance on preventing, identifying and addressing child labour.



EXECUTIVE SUMMARY

The International Finance Corporation (IFC) has developed this comprehensive Good Practice Note (GPN) to support private sector entities in addressing child safeguarding risks and impacts. This guidance underscores the vital role businesses play in protecting children and advancing sustainable development. It offers foundational knowledge, practical steps, and user-friendly tools and approaches to help businesses embed child safeguarding into their operations, supply chains, and strategic decision-making. The guidance aligns with established international standards, good practice in child safeguarding, and legal instruments, including the United Nations Convention on the Rights of the Child (1989), ILO Conventions on Child Labour, and the United Nations Guiding Principles on Business and Human Rights.

MAIN SECTIONS OF GPN



Section 2. Understanding Safeguarding

- > Definitions
- > The Business Case



Section 3. Causes and Risks

- > Causes of Abuse and Exploitation
- > Industry Sector Risk Factors



Section 4. Key Actions for Businesses

> 5 Step Framework for Assessment, Mitigation, and Response



Section 5. Key Actions for Financial Institutions

> Role of Financial Institutions in Promoting Safeguarding



Annexes

> Practice tools and resources

KFY HIGHLIGHTS

UNDERSTANDING CHILD SAFEGUARDING

This GPN differentiates between child safeguarding, which pertains to organizational responsibilities, and child protection, which refers to broader national systems and policies (see 2.1).

Child safeguarding encompasses the obligation of organizations to ensure that their operations and those working for and with them do not cause harm or expose children to abuse, exploitation, or neglect. It emphasizes proactive measures to prevent and mitigate risks, acknowledging the heightened vulnerability of children due to their age and developmental stage.

THE BUSINESS CASE FOR CHILD SAFEGUARDING

Child abuse and exploitation present serious economic, social, and ethical consequences, costing the global economy an estimated US\$ seven trillion⁴⁴ annually. Addressing these risks is essential for businesses to mitigate reputational, financial, and operational threats while aliqning with sustainability objectives.

Risk arises in diverse sectors—from child labor in supply chains to exploitation in marketing, tourism, health care, and education. By implementing robust safeguarding measures, businesses can enhance stakeholder trust, reduce liability, and demonstrate leadership in responsible business conduct. Companies are encouraged to adopt the highest safeguarding standards, even where local regulations may be less stringent.

CAUSES AND RISK FACTORS

The root causes of child abuse and exploitation span multiple levels: individual, familial, community, and societal. Contributing factors include poverty, insufficient legal

protections, and harmful cultural norms. Tailored, sectorspecific responses are essential as sectors present specific heightened risks for children. For example:

- > Agriculture: High prevalence of child labor due to economic pressures and traditional practices.
- > Hotels and Tourism: Potential for child sexual exploitation and child unsafe environments in family-oriented facilities.
- Information and Communication Technology: Online grooming, exposure to harmful content, and data privacy breaches.
- > Infrastructure: Labor influxes can increase risks of child exploitation within local communities.

ACTION FRAMEWORK FOR BUSINESSES

The GPN proposes a five-step framework to guide businesses in building effective child safeguarding systems:

- **1. Identify Risks and Impacts** Conduct risk assessments to understand how business activities may affect children.
- Assess Capacity and Competency Evaluate internal policies, training, and resources for managing safeguarding risks.
- Conduct In-Depth Assessments In high-risk contexts, undertake detailed evaluations to identify vulnerabilities and sector-specific threats.
- **4. Implement Prevention and Response Measures –**Establish policies, codes of conduct, grievance mechanisms, and procedures to prevent harm and manage incidents.
- 5. Monitor, Learn, and Improve Continuously assess and enhance safeguarding practices to ensure ongoing effectiveness and adaptation.

Specific suggestions for actions that Financial Institutions can take are also included.

⁴⁴ Pereznieto, P., Montes, A., Routier, S., Langston, L. (2014). The costs and economic impact of violence against children

PRACTICAL TOOLS AND RESOURCES

The GPN provides tools for crafting child-sensitive policies and procedures (see annexes). It advocates integration with broader environmental and social management systems and promotes collaboration with key stakeholders, including communities, governments, NGOs, and child protection experts. In high-risk contexts, businesses are also

encouraged to engage directly with children using ethically sound consultation methods.

Key tools include tips sheets and information on principles for engaging with children, establishing child-sensitive grievance mechanisms, developing appropriate Codes of Conduct, safer recruitment strategies, and the role of the Focal Point in child safequarding.

Conclusion

This document aims to equip businesses with essential knowledge and tools to proactively address child safeguarding.

For example, a well-developed Child Safeguarding Code of Conduct policy is a cornerstone of effective child safeguarding within a company. Whether integrated into broader policies or created as a standalone document, it provides clear guidance on expected behaviors, fosters accountability, and helps create a safe environment for children. By tailoring the policy to their specific context and ensuring widespread awareness, companies can demonstrate their commitment to safeguarding children and maintaining ethical practices.





INTRODUCTION

Children, defined as individuals under the age of 18, make up one-third of the global population, and account for more than 50 percent in many of the world's poorest countries. 45 Despite their significant presence, children often remain an overlooked stakeholder group in business decision-making and operations. Businesses impact children in various roles—either as consumers, workers, members of communities, or dependents of employees—and these interactions can have profound and lasting effects on their well-being. 46 By integrating child safeguarding into their operations, businesses can play a critical role in protecting children, promoting their rights, and contributing to sustainable development.

This Good Practice Note (GPN) aims to assist businesses in preventing harm to children by providing essential knowledge on child safeguarding and outlining key actions to enhance their safety. It aims to strengthen practices by businesses, including strategies to address gender-based violence and harassment in the workplace, which may also affect children, and through strengthening company social performance. It is important to note that the GPN is not intended to serve as a comprehensive guide to child safequarding or child protection, nor does it provide detailed quidance for implementing all recommended actions. Instead, it offers foundational guidance and actionable insights to help businesses take meaningful steps toward safeguarding children. To complement the GPN, IFC is developing additional practical materials to support businesses in implementing the key actions outlined in this document.

1.1 FORMAT AND CONTENTS OF THE GOOD PRACTICE NOTE

Although child safeguarding is a new focus for many private sector businesses, some organizations have already made significant strides in developing and implementing measures to protect children from harm. These efforts include identifying, preventing, and addressing risks related to child abuse and exploitation. This GPN builds upon those experiences, highlighting established good practices and providing guidance to help businesses introduce or enhance their own child safeguarding measures.

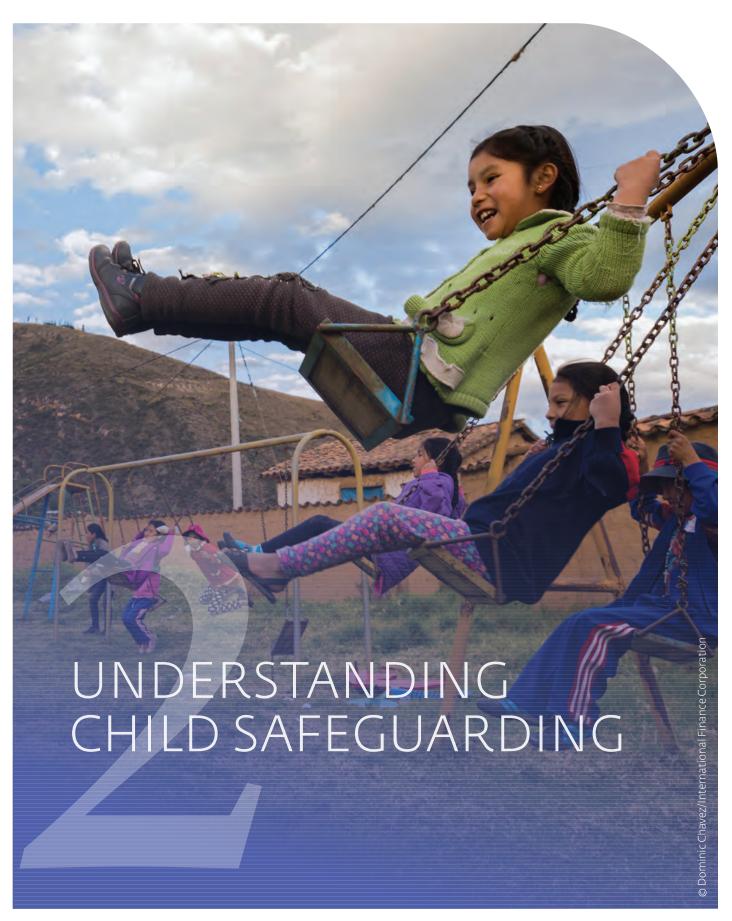
The GPN begins by defining child safeguarding and outlining the business case for its adoption, emphasizing why it is a critical consideration for the private sector. It then delves into key aspects of safeguarding, presenting essential information and practical steps businesses can take to protect children effectively. The document concludes by highlighting specific actions that Financial Institutions can undertake to strengthen child safeguarding efforts across the private sector.

To ensure clarity and avoid redundancy, the term 'abuse and exploitation' is used as a comprehensive umbrella term encompassing all forms of child maltreatment, abuse, violence, and exploitation, as detailed in the glossary.

By leveraging insights from other sectors and tailoring them to the private sector context, this GPN aims to equip businesses with the tools and knowledge needed to prioritize child safeguarding, mitigate risks, and contribute to the broader goal of protecting children from harm.

⁴⁵ United Nations Development Programme (UNDP) and Oxford Poverty and Human Development Initiative (OPHI) (2023). Global Multidimensional Poverty Index, p.1.

⁴⁶ UNICEF (2021) <u>Tool for Investors on Integrating Children's Rights into ESG Assessment</u>.



2



UNDERSTANDING CHILD SAFEGUARDING

<u>The United Nations Convention on the Rights of the Child (UNCRC)</u> defines a child as any person below the age of 18 years old, irrespective of the local age of majority or age of consent. Adolescents, ages 10–18 years, are therefore also included within the UNCRC definition of children.

This section examines the concept of child safeguarding, highlighting its significance and the implications for businesses. It outlines why private companies should prioritize child safeguarding as part of their operations and decision-making processes. Additionally, it provides an overview of the relevant legal and regulatory frameworks that govern child safeguarding, offering businesses a clear understanding of their obligations and responsibilities.

This information is designed to deepen understanding and emphasize the importance of implementing child safeguarding measures within business operations. It underscores the critical role businesses can play in protecting children and promoting their safety.

2.1 DEFINING CHILD SAFEGUARDING

Child safeguarding is a key component of the broader concept of social safeguarding. It refers to the responsibility of organizations and companies to ensure that their staff, operations, and programs do not cause harm to individuals, including children and adults at risk, nor expose them to the risk of harm or abuse. ⁴⁷ This responsibility extends beyond

The United Nations Convention on the Rights of the Child (UNCRC) ratified by nearly all nations worldwide, and

(UNCRC) ratified by nearly all nations worldwide, and typically reflected in domestic (national) legislation, explicitly states that children have the right to be protected from all forms of physical or mental violence, injury or abuse, neglect or negligent treatment, maltreatment or exploitation, including sexual abuse.

addressing Sexual Exploitation, Abuse, and Sexual Harassment (SEAH) or child labor, and covers all forms of abuse.

Child safeguarding focusses on protecting children from both unintentional and intentional harm.⁴⁸ It includes proactive

⁴⁷ CHS Alliance (2017). **PSEA Implementation Quick Reference Handbook**.

⁴⁸ Although all the activities of the business are covered, including operations and supply chains, child safeguarding in this context does not extend to activities and actions that are subject to other market and regulatory frameworks. For example, in the case of manufacturing of a drug, the process of manufacturing and the supply of resources would be considered as part of the child safeguarding function, but the licensing and approval for use of the drug by children would be considered as outside of the scope of child safeguarding.

measures taken by companies to identify, mitigate, and manage child safeguarding risks and impacts throughout the planning and execution of projects, including within their supply chains. These measures are designed to ensure the safety and well-being of children at all ages and stages of development, recognizing them as a vulnerable group (by definition, on account of their age).

Additionally, children with heightened vulnerabilities—such as those with disabilities—may require tailored safeguarding considerations to address their specific needs and ensure their protection. By integrating child safeguarding into their operations, businesses can play a vital role in fostering safe environments and upholding the rights of children.

Box 2.1. Child Protection versus Child Safeguarding?

While closely related, child safeguarding and child protection have distinct focuses. Child safeguarding refers to the internal measures an organization or business implements to ensure children who interact with its operations, activities or services are not exposed to harm, including abuse or exploitation, because of the organization's actions or omissions.

In contrast, child protection is a broader concept that encompasses efforts to safeguard children within families and communities who are identified as experiencing—or at risk of—significant harm. It involves national policies, legal frameworks, and social welfare systems designed to prevent and respond to all forms of child abuse. Responsibility for child protection is typically shared across government agencies, with services delivered by local authorities, non-State actors, and community organizations.

Child safeguarding is a critical component of the wider child protection framework, focusing specifically on the role and responsibilities of organizations in preventing harm to children within the scope of their operations and influence.

Child safeguarding encompasses the actions and measures organizations take to ensure the safety and well-being of children with respect to their business operations. Businesses and investors, each with their unique roles and responsibilities, have a duty of care to identify, assess and mitigate risks and impacts to the safety and well-being of children who are involved in or affected by their operations. This responsibility is integral to fostering ethical and sustainable business practices.

Breaches of child safeguarding can occur in various scenarios within business contexts, highlighting the need for proactive measures. For instance, an employee might perpetrate child sexual abuse during business travel or through involvement

in a corporate social responsibility project. A child could be subjected to bullying or grooming in an online chat room hosted by the business or experience harmful treatment while participating in an advertisement as a model.⁴⁹ Furthermore, children may face commercial exploitation in the manufacturing or agricultural sectors or endure corporal punishment in educational settings linked to business-sponsored initiatives.

These examples underscore the critical importance of robust child safeguarding measures to prevent harm and ensure businesses operate responsibly. By addressing these risks, a company can protect children, uphold their rights, and contribute to its broader social sustainability goals.

⁴⁹ UNICEF (2018). Child safeguarding toolkit for business. A step-by-step guide to identifying and preventing risks to children who interact with your business.

2.2 BUSINESS CASE FOR CHILD SAFEGUARDING

Background

Child abuse and exploitation are pervasive issues that occur in all countries and affect children of all ages (see Box 2.2.). ⁵⁰ The global economic ramifications are staggering: associated costs have been estimated at US\$ seven trillion annually, ⁵¹ accounting for up to eight percent of global GDP (Gross Domestic Product). ⁵²

Beyond the devastating and long-lasting impact on children's physical, emotional, and psychological well-being, child abuse and exploitation have far-reaching consequences for the broader economy. These costs include immediate

expenditure on medical and psychological care, as well as long-term financial demands, especially for health care and criminal justice. Additionally, the economic potential of affected individuals is often eroded by consequences such as lower educational attainment, 53 reduced productivity, and limited workforce participation.

Addressing child abuse and exploitation is not only a moral imperative but also an economic necessity. By investing in prevention and safeguarding measures, businesses, governments, and communities can mitigate these costs, protect children's rights, and contribute to a healthier, more sustainable global economy.

Box 2.2. Prevalence of Child Abuse and Exploitation

- > Among girls ages 15 to 19 worldwide, almost one quarter (around 70 million) are victims of some form of physical violence.⁵⁴
- > One in five girls, and one in ten boys have experienced some form of sexual abuse and exploitation before the age of 18.55
- > For children of sexual and/or gender minorities, 21 percent of trans girls, 22 percent of questioning young people, 27 percent of trans boys and 28 percent of nonbinary young people reported childhood sexual abuse. 56
- > Around 120 million girls worldwide (roughly one in 10) have experienced forced intercourse or other forced sexual acts at some point in their lives. 57
- > Almost one in three children with disabilities worldwide have experienced abuse including physical, emotional, or sexual abuse, as well as neglect.⁵⁸
- > One in five women and one in 13 men report being sexually abused as children. 59
- > Every five minutes a child dies because of violence. 60

⁵⁰ Ligiero, D., Hart, C., Fulu, E., Thomas, A., & Radford, L. (2019). What works to prevent sexual violence against children: Executive Summary. p. 5.

⁵¹ Pereznieto P., Montes A., Routier S., Langston L. (2014). The costs and economic impact of violence against children.

⁵² United Nations Office of the Special Representative on Violence Against Children (2022). <u>The violence-prevention dividend: why preventing violence against children makes economic sense</u>.

⁵³ As previous reference.

⁵⁴ Ligiero, D., Hart, C., Fulu, E., Thomas, A., & Radford, L. (2019). What works to prevent sexual violence against children: Executive Summary.

⁵⁵ CPC Learning Network (2023). Adapting World Bank ESF SEA/SH Risk Management to the Needs of Diverse Children.

⁵⁶ Mark Capaldi, Jennifer Schatz, Mark Kavenagh, (2024) Child sexual abuse/exploitation and LGBTQI+ children: Context, links, vulnerabilities, gaps, challenges and priorities, Child Protection and Practice, Volume 1.

⁵⁷ UNICEF (2014). <u>Hidden in Plain Sight: A statistical analysis of violence against children</u>.

⁵⁸ Fang, Zuyi, et al (2022)'Global estimates of violence against children with disabilities: an updated systematic review and meta-analysis, The Lancet Child & Adolescent Health, vol.6, issue 5, 313–323.

⁵⁹ Stoltenborgh, Marije, et al. (2011)'A Global Perspective on Child Sexual Abuse: Meta-analysis of prevalence around the world', Child Maltreatment, vol. 16, no. 2.

⁶⁰ World Health Organization (2012) Global Health Estimates (GHE) Summary Tables: Deaths by cause, age, sex and region, WHO, Geneva.

Impact on Businesses

Beyond the broader economic and social ramifications of child abuse and exploitation, businesses must recognize the direct impact their operations may have on children and take proactive steps to prevent harm. All businesses, particularly those that interact with or affect children, have a responsibility to assess whether their activities pose risks to children's safety. Where risks are identified, businesses must implement effective measures to safeguard children from harm. ⁶¹ Currently, corporate risk assessments rarely account for children, and when they do, the focus is often limited to child labor. 62 However, a growing number of businesses are taking steps to adopt child safeguarding measures, 63 recognizing that failure to address these risks can lead to severe financial and reputational damage. Additionally, the long-term consequences of neglecting child safequarding include reduced productivity and diminished economic potential, as victims and survivors may face barriers to workforce participation and educational attainment.64

Although data on the financial costs to businesses of failing to implement child safeguarding measures remains fragmented (often undisclosed)—particularly in cases involving settlements—there are nevertheless documented instances of businesses suffering losses caused directly by their failure to protect children. These losses include legal liabilities, reputational harm, operational disruptions, and diminished stakeholder trust.

By integrating child safeguarding into their risk management frameworks, businesses can not only protect children but also mitigate financial and reputational risks, strengthen stakeholder relationships, and contribute to sustainable economic growth.

Through implementing child safeguarding measures proportionate to the risks identified in their business operations, companies can uphold the human rights of children, enhance environmental and social sustainability practices, strengthen their reputation, and contribute to a more sustainable business environment. Proactively preventing child safeguarding incidents and ensuring an adequate response to any such cases not only supports the welfare of children but also fosters the development of resilient and thriving communities. ⁶⁵

The implementation of child safeguarding measures should be viewed as a critical risk mitigation strategy. It enables businesses to proactively address potential risks, reducing exposure to situations that could result in ethical violations, reputational damage, and financial losses. 66 By prioritizing child safeguarding, businesses can align their operations with global sustainability goals while protecting their long-term interests and contributing to positive social outcomes.

2.3 LEGAL AND REGULATORY FRAMEWORKS

The fundamental right of children to be protected from abuse and exploitation is firmly enshrined in international law and reinforced by national legal frameworks and child protection systems. This reflects a global commitment to upholding children's rights and promoting their safety, well-being, and development. The 1948 *Universal Declaration of Human Rights* proclaimed that childhood is entitled to special care and assistance, establishing a foundational principle for the protection of children. The importance of providing particular care to children has been reaffirmed through key international instruments, including the Geneva Declaration of the Rights

⁶¹ Further information on the legal and regulatory framework is provided in section 2.3 of this publication.

⁶² Due to insufficient awareness of child safeguarding and children rights, businesses often consider children only in relation to labor conditions but do not conduct necessary risk assessments in relation to other areas and activities. A failure to disclose risks not related to child labor leads to further exacerbation of the issue of invisibility of child safeguarding risks. For more information refer to: UNICEF (2021). Tool for Investors on Integrating Children's Rights into ESG Assessment, p. 7.

⁶³ Note – Examples are provided throughout this Good Practice Note.

⁶⁴ United Nations Office of the Special Representative on Violence Against Children (2022). <u>The violence-prevention dividend: why preventing violence against children makes economic sense</u>.

⁶⁵ UNICEF (2014). <u>Children are everyone's business: workbook 2.o. A guide for integrating children's rights into policies, impact assessments and sustainability reporting</u>.

⁶⁶ Adapted from Oxford Policy Management (2018). Five reasons why companies should care about child safeguarding.

of the Child (1924), the Declaration of the Rights of the Child (1959), and the statutes and relevant instruments of specialized agencies and international organizations. These frameworks collectively underscore the global responsibility to uphold children's rights and ensure their protection from harm, serving as a cornerstone for efforts to create safe and

'The responsibility to respect human rights is a global standard of expected conduct for all business enterprises wherever they operate. It exists independently of States' abilities and/or willingness to fulfil their own human rights obligations and does not diminish those obligations.'

—from UN Guiding Principles on Business and Human Rights (2020, page 13).

nurturing environments for all children.

The <u>UN Convention on the Rights of the Child (UNCRC)</u> is widely recognized by the majority of states as the primary legal instrument setting out the civil, political, economic, social and cultural rights to which children are entitled. It serves as a comprehensive framework for the protection and promotion of children's rights globally.

At the national level, legal frameworks typically establish protections for children by defining child abuse and exploitation, mandating reporting requirements for suspected cases, creating child protection systems⁶⁷ and prescribing penalties for perpetrators. These frameworks provide the foundation for safeguarding children and ensuring accountability for violations of their rights. In addition, there are several regulatory and policy frameworks and good industry practice standards aimed at businesses, as outlined below.

In instances where discrepancies arise between national laws and international standards, it is widely regarded as best practice to prioritize the standard or legislation that provides the higher level of protection for children. This approach ensures that safeguarding measures align with

the most robust and comprehensive framework available, reinforcing the commitment to upholding children's rights and promoting their safety and well-being.

Standards for Business

Businesses can align their operations with international standards related to children's rights and child safeguarding to ensure robust protection and ethical practices. Key standards include:

- United Nations Convention on the Rights of the Child (UNCRC, 1990): The most comprehensive legal framework outlining the civil, political, economic, social, and cultural rights of children, ratified by most states globally.
- > International Labour Organization (ILO) Conventions:
 - ILO Convention No. 138 on Minimum Age (1973):
 Establishes minimum age requirements for employment to prevent child labor.
 - ILO Convention No. 182 on the Worst Forms of Child Labour (1999): Focuses on eliminating hazardous work and exploitation of children.
- > Keeping Children Safe standards: a set of guidelines developed to safeguard children from harm, abuse, and exploitation within businesses. These standards provide guidance on implementing child protection policies, procedures, and training to ensure a safe environment for children.
- > The Children's Rights and Business Principles (CRBP):
 Developed by UNICEF, the UN Global Compact, and
 Save the Children, these principles guide businesses in
 integrating children's rights into their strategies and
 operations. CRBP focuses on child labor, child protection,
 education, and health care, aiming to ensure that
 businesses respect and support children's rights. They

are founded on the rights outlined in the Convention

⁶⁷ A child protection system is defined as the set of laws, policies, regulations and services on social welfare, education, health, security and justice that serve to support prevention and response to child protection risks. These services are provided by government agencies, local authorities, non-state actors, community groups and other actors. Source: UNICEF (2021). <u>Child Protection Systems Strengthening</u>, p. 9.

of the Rights of the Child and its Optional Protocols. The principles are also based on ILO Convention No.182 on the Worst Forms of Child Labour and No. 138 on the Minimum Age.

> UN Guiding Principles on Business and Human Rights
(UNGP): a framework for businesses with guidance on
how to respect and protect human rights (including the
rights of children), emphasizing the responsibility of
corporations to avoid infringing on human rights and
obligation to address adverse impacts when they occur.

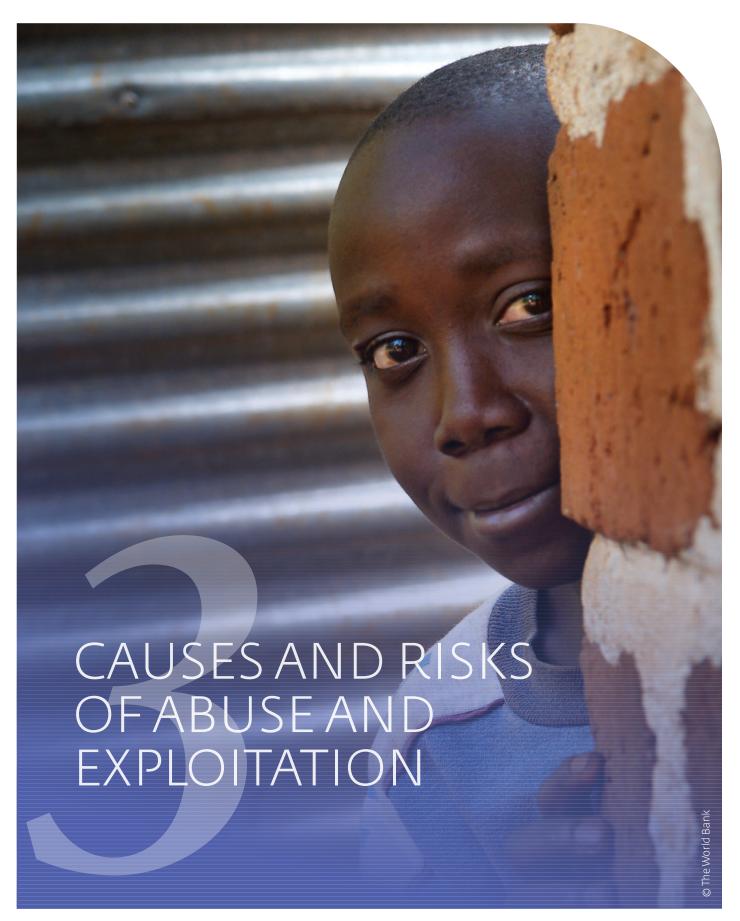
By adhering to these international standards, businesses can demonstrate their commitment to safeguarding children, mitigating risks, and contributing to the broader global effort to protect children's rights and well-being.

In addition, standards applicable to businesses may be derived from those established by funders or conditions tied to loans. For instance, the 2012 IFC Performance

Standards on Environmental and Social Sustainability

provide comprehensive guidance on good practices for risk identification, mitigation, and management in private sector operations. IFC Performance Standard 2 emphasizes that economic growth through employment creation and income generation must be accompanied by the protection of fundamental workers' rights. Et specifically considers children, stating that in countries where individuals under the age of 18 can be legally employed or engaged as apprentices, businesses are required to identify child workers and act upon applicable labor laws in order to protect children from harm.

⁶⁸ IFC (2012). Performance Standard 2: Labor and Working Conditions, para 1.



3

CAUSES AND RISKS OF ABUSE AND EXPLOITATION

This section provides an overview of the underlying causes of child abuse and exploitation, along with an analysis of specific industry sector risks. Without this information, businesses cannot assess the potential risks their activities may create or exacerbate, nor implement appropriate mitigation and response actions.

3.1 CAUSES OF CHILD ABUSE AND EXPLOITATION

Child abuse and exploitation and the business sector

These are complex, multifactorial issues influenced by a combination of individual, family, societal, and cultural factors. ⁶⁹ By recognizing the multifaceted causes, businesses can play a critical role in creating safer environments for children, ensuring their protection, and supporting their development. Key risk factors include:

1. Company-Level Factors:

- Limited child safeguarding awareness: A lack of systems and processes to identify and mitigate risks can increase vulnerability.
- > Risk-enabling business activities: Examples include inactive leadership, failure to address risks in supply chains, and poor project design.
- > Negative business culture and norms: Certain industries may perpetuate harmful views of children, such as private-sector investments in prisons where children are viewed as dangerous, private hospitals and orphanages where children are seen as "damaged goods", or companies where children are targeted as "easy prey" for sales.

2. Societal Factors:

- > Weak legal frameworks: Lack of enforcement or sanctions against abuse and exploitation.
- > Violence-supportive norms: Acceptance of practices such as child marriage and child labor.

3. Community-Level Factors:

- > High poverty rates: Economic hardship increases vulnerability.
- > Labor influx: Large-scale projects can bring risks of exploitation.
- > Remote or rural settings: Limited access to services and oversight can heighten risks.
- > Prevalence of abuse and GBV: Communities with high rates of gender-based violence and child abuse are particularly vulnerable.

In addition, influences at individual and family level can increase children's vulnerabilities and need to be appreciated by companies when considering how their activities (and

⁶⁹ Adapted from Ligiero, D., Hart, C., Fulu, E., Thomas, A., & Radford, L. (2019). What works to prevent sexual violence against children: Executive Summary, p. 7.

the actions of their staff) may impact children's lives. This includes:

1. Family-Level Factors:

- > Displacement: Families forced to relocate may face instability, increasing risks for children.
- > Family honor dynamics: Cultural pressures may prioritize family reputation over child safety.
- > Lack of parental support: Poor family structures or absent caregivers can leave children unprotected.

2. Individual-Level Factors and Intersectional Vulnerabilities

Children inevitably reflect society's diversity in language, culture, religion, and economic status. Their age and developmental stage also impact their vulnerability. For example:

- > **Age and gender:** Younger children and girls are often more vulnerable.
- > **Disability:** Children with disabilities may face heightened risks.
- > Lack of education: Limited awareness of rights and protections can increase susceptibility to exploitation.
- > Infants and toddlers are more susceptible due to their dependency and limited communication skills.
- > Adolescents face risks related to increased independence and fear of retaliation or disbelief if they report abuse.70

Intersecting inequalities such as gender, sexuality, disability, race, ethnicity, and other personal factors can place specific children at greater risk. These factors must be considered when evaluating risks and designing mitigation measures.⁷¹

Power imbalances and gender inequality are key drivers of child abuse and exploitation

Abuse and exploitation often stem from power imbalances between adults and children. Children are naturally and legally dependent on caregivers and other adults, making them vulnerable. Perpetrators of abuse often hold greater authority, physical strength, and influence, and may occupy positions of privilege relative to the child and their family. This imbalance creates an environment where abuse can occur.⁷²

Action for businesses – creating safer environments

As mentioned above, child abuse and exploitation are not simple issues. There is no single cause: instead, a range of interconnected influences contribute to its occurrence. Among these, poverty significantly increases children's vulnerability to exploitation. Businesses must thus understand the complex interplay of these factors, and take proactive steps to mitigate risks, such as:

- **Building awareness:** Educating leadership and staff on child safeguarding principles.
- > **Strengthening systems:** Implementing robust policies and processes to identify and address risk, such as child protection policies and Codes of Conduct.
- > Engaging communities: Collaborating with local stakeholders to address societal and community-level vulnerabilities.
- > **Supporting families:** Providing resources and support for families in need that are affected, or likely to be affected, because of the business activities.
- > Considering individual needs: Designing interventions that account for intersecting vulnerabilities and personal circumstances.

⁷⁰ Public Health England (2020). **No child left behind: understanding and quantifying vulnerability**.

⁷¹ World Bank (2022). Good Practice Note: Addressing Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) in Human Development Operations.

⁷² As previous footnote.

3.2 INDUSTRY SECTOR RISK FACTORS

Child safeguarding risks vary across industries, with some sectors facing unique challenges due to the nature of their operations. While many risks are common across sectors, understanding industry-specific vulnerabilities is essential for businesses to identify, mitigate, and address risks effectively.

Agriculture

The agricultural sector is particularly high-risk for child labor due to socio-economic and cultural factors including:

- > **Poverty:** Families may rely on children's income, especially in areas with limited access to education.
- > **Traditional practices:** Family businesses often involve children from a young age.
- Risks to children: Exposure to harmful substances, physically demanding tasks, long hours, low wages, and school dropout are common, especially in remote and poorer areas.
- > **Seasonal and migratory work:** Creates opportunities for exploitation and trafficking.
- Children accompanying parents: Even when businesses enforce policies against hiring children, those accompanying parents to work remain vulnerable to abuse and exploitation.

Education and Recreation

Children may face harm both within and beyond the confines of the classroom, from peers, from adults in positions of authority, and when engaged in organized recreational activities or sports. Teachers and school staff hold positions of responsibility and trust and have direct contact with children. Harm can manifest in various ways—in addition to child-on-child abuse—when teachers or other staff resort to physical punishment or emotional harm (such as heavily criticizing), or when children are physically injured for lack of supervision or because of participation in a dangerous or unsuitable activity. Staff and others may exploit their

position of authority by coercing children into sexual activity in exchange for academic or other benefits or subjecting them to sexual harassment. Consider:

- > **Abuse by peers or authority figures:** Includes physical punishment, emotional harm, and sexual exploitation by teachers, staff, or others in positions of trust.
- > **Bullying and harassment:** Students who belong to sexual and/or gender minorities, are particularly vulnerable to abuse due to their sexual orientation or gender identity.
- > **Unsafe environments:** Risks are heightened in areas with less supervision, such as restrooms, changing areas, dormitories, hallways, and playgrounds.
- > Transportation and facilities: Safeguarding risks extend to commutes, outings, and activity venues, including facilities under construction (see infrastructure)⁷³.

If left unaddressed, these risks can result in dropout, limiting children's opportunities for learning and development.

Health

Health care settings can prevent and address child abuse and exploitation; however, they can also serve as venues where abuse and exploitation occur, perpetrated by health care workers and auxiliary staff against child patients, as well as risks from adult patients and visitors. Specifically:

- > Health care professionals hold positions of trust and have direct interaction with and proximity to children, often in enclosed environments such as hospital rooms, where there is the risk that physical, emotional, or sexual abuse might occur.
- > Health care providers may violate children's rights to confidentiality and privacy. Such breaches can lead to stigmatization, discrimination, and psychological distress for both children and their families.
- > Adult patients and visitors may pose a risk to children.

⁷³ Asian Development Bank (2023). Good Practice Note on Addressing Sexual Exploitation, Abuse and Harassment in ADB-Financed Projects with Civil Works, p. 60.

Information Communication and Technology (ICT)

Children face significant risks when online, even for educational purposes, as they may encounter individuals seeking to exploit or abuse them through social media or chat groups. Such risks include:

- > Exposure to harmful content: Exposure to inappropriate content such as pornography, violence, extremism, or materials related to self-harm.
- Online exploitation: Risks such as identity theft, stalking, cyberbullying, and other forms of online harassment.
- > **Privacy concerns:** Children may unknowingly share personal information, increasing their vulnerability to exploitation.

Infrastructure

Infrastructure projects can create environments that heighten risks for children in numerous ways:

- > Labor influx: The arrival of large, typically male workforces can increase risks of sexual exploitation and abuse, particularly for adolescent girls in surrounding communities.
- > Hazardous work conditions: Children may seek employment opportunities, exposing them to exploitative labor or unsafe environments.
- > Economic opportunities: Infrastructure projects can also attract children due to the new economic opportunities, such as selling goods or working as housekeepers, creating the risk for children to be exploited and abused.74
- > Accidents: Children are often injured because of accidents in poorly secured work areas, or inadequate traffic management.

Marketing

Marketing activities can pose risks to children's privacy and well-being. The collection and use of children's personal data for marketing activities raises privacy concerns, especially

if proper consent and data protection measures are not in place. Key concerns for companies are:

- > **Data collection:** Improper consent and data protection measures can lead to unauthorized access to children's personal information and potential exploitation by malicious individuals.
- > Participation in campaigns: Children's paid involvement in marketing campaigns raises concerns about exploitation, privacy violations, and negative psychological impacts.
- > **Compliance:** Ensuring adherence to labor laws is crucial to protect children's well-being.

Travel and Tourism

The travel and tourism industry can inadvertently contribute to child exploitation, through child sex tourism, whereby travelers engage in sexual activities with children, either through premeditated plans or because the opportunity presents itself and the practice is normalized. This demand for sexual services can perpetuate the exploitation of children, because it can be financially lucrative for traffickers and facilitators who exploit vulnerable children for profit. Business travel often involves little supervision, creating opportunities for hidden abuse. Lack of awareness, language barriers and cultural differences may further hinder efforts to identify and address instances of child sexual exploitation and abuse.⁷⁵

Additionally, amusement parks, family resorts, and popular tourist destinations can attract predators due to high traffic and moments when children are unsupervised. These environments provide opportunities for grooming and exploitation, especially with the sharing of location details online. To mitigate these risks, it is essential for businesses to implement strict security measures and to be vigilant, ensuring children are always supervised and aware of safety protocols.

The negative impact of abuse and exploitation on children cannot be overstated. The legacy can include severe and lifelong physical, emotional, and psychological damage (see Annex A).76

⁷⁴ Adapted from DFAT (2017). Child Protection Guidance Note: Child Protection in Infrastructure Activities.

⁷⁵ ECPAT (2016). Offenders on the move: global study on sexual exploitation of children in travel and tourism.

⁷⁶ As previous footnote.

Other risks to children through travel and tourism that businesses should be aware of include:

- > Trips, or excursions that expose children to greater vulnerability—such as visits to orphanages.
- > Unsafe environments—in offering services like babysitting, for example, or at children's clubs without
- qualified staff or supervision (leading to accidents, for example, or getting lost).
- > Increased begging by children in tourist areas resulting in exploitation and potential trafficking in children (this is countered by encouraging tourists to donate to recognized charities instead of giving money to individual children).





4

KEYACTIONS FOR BUSINESSES

This section aims to equip private sector companies with the essential knowledge to understand how to address child safeguarding issues and risks. The process has been distilled into five key steps, each playing a crucial role in building a robust child safeguarding framework. By following these steps, a safer environment can be created for children interacting with the organization, upholding ethical responsibilities and maintaining reputation. Each step is underpinned by fundamental guiding principles that are integral to action promoting children's best interests, their well-being and development (see Annex B).

It should be noted that specialist child safeguarding and protection guidance may be needed. This is particularly the case where business operations directly interact with children (for example, as consumers in the tourism industry).

Step One: Identify Child Safeguarding Risks and Impacts

The Children's Rights and Business Principles (CRBP) highlight that a business's responsibility toward children extends far beyond addressing child labor and must begin with a holistic understanding of the diverse ways in which business operations can impact children's rights. The CRBP urges businesses to identify and assess any actual or potential adverse impacts on children's rights—directly from their own activities, or indirectly through business relationships.77

Increasingly, investors expect companies to conduct comprehensive environmental and social risk assessments and establish robust environmental and social management systems (ESMS). When children are integral to business operations—or potentially affected—child safeguarding

measures should be integrated into the company's ESMS to ensure risks are effectively managed and mitigated.

Research and practical experience indicate that child safeguarding risks typically emerge in three ways, as outlined in Table 4.1. These categories provide a framework for businesses to identify, assess, and address risks to children within their operations and supply chains, ensuring alignment with global standards and best practices.

By embedding child safeguarding into their ESMS, businesses can not only fulfil their obligations under the CRBP but also demonstrate leadership in promoting children's rights and contributing to sustainable development.

⁷⁷ UNICEF (2014). Children are everyone's business: workbook 2.o. A guide for integrating children's rights into policies, impact assessments and sustainability reporting, p. 12.

Table 4.1. Child safeguarding primary threat sources

Threat source Ex

Explanation

Impact of business activities

Large-scale business projects, such as infrastructure development, for example, or land acquisitions, can have significant and far-reaching impacts on children. These projects often lead to population displacement or migration, which can disrupt critical social systems, including care arrangements, access to education, and health care services. Relocation can destabilize families and communities, leaving children particularly vulnerable to neglect, exploitation, and abuse. Furthermore, land acquisition projects may have long-term consequences for future generations, affecting their access to resources and opportunities.

Risks also frequently manifest within supply chains, when businesses procure goods or resources from suppliers that employ children or operate in exploitative environments. These secondary effects can contribute to child labor, trafficking, and various forms of abuse. **Businesses must recognize that their operations and procurement practices can indirectly perpetuate extremely harmful practices, even if they are not directly involved.**

To mitigate these risks, businesses should conduct thorough risk assessments, implement child safeguarding measures, and ensure that their supply chains adhere to ethical and legal standards. By addressing these challenges proactively, businesses can protect children's rights, reduce harm, and contribute to sustainable and responsible development.

Unintentional acts

In a business setting these can have devastating consequences for children, including injury, abduction, or even death. These incidents often result from inadequate care or the absence of robust policies and procedures to guide staff in planning and ensuring safe business operations. Such risks may also arise when company employees fail to comply with established legal requirements: this underscores the critical need for businesses to enforce stringent safeguarding protocols.

To mitigate these risks, businesses must, as a matter of urgency, establish and implement comprehensive child safeguarding measures involving:

- > **Clear policies and procedures:** Ensure all staff are equipped with guidelines to prevent harm and promote safe practices.
- > Training and awareness: Provide regular training to employees on child safeguarding protocols and legal requirements.
- > Monitoring and enforcement: Implement systems to monitor compliance and address any breaches swiftly and effectively.

Deliberate acts

Opportunistic or predatory offenders pose significant risks to children in business settings. These individuals intentionally seek roles or positions within organizations that provide access to children, with the intent to abuse. For example, offenders may target employment or volunteer opportunities in child-centered organizations, such as schools, children's hospitals, or youth programs. They may also infiltrate third-party contractor roles, such as cleaning staff or facility maintenance, where oversight may be limited.

Predators may misuse online platforms, exploit corporate social responsibility (CSR) programs, or take advantage of international operations with lax oversight. Additionally, businesses sponsoring youth events or activities may inadvertently provide opportunities for offenders to establish trust and gain unmonitored access to children. These individuals often exploit gaps in organizational child safeguarding policies, inadequate background checks, and weak oversight mechanisms to commit abuse under the guise of legitimate roles.

In some cases, perpetrators may not actively seek out opportunities to abuse children but exploit situations that arise. For instance, delivery drivers or other transient workers who spend extended periods away from home may engage in commercial sexual exploitation of children in the local areas where they are lodging.

Mitigation strategies can include:

- **Comprehensive background checks:** Ensure thorough vetting of all employees, contractors, and vendors, particularly those in roles with access to children.
- > **Child safeguarding policies:** Develop and enforce clear policies that outline acceptable behavior and procedures for interacting with children.
- > **Training and awareness:** Provide regular training to staff and contractors on recognizing and preventing abuse, as well as reporting suspicious behavior.
- **Oversight and monitoring:** Strengthen supervision and monitoring mechanisms, especially in high-risk roles or activities involving children.
- > **Risk assessments:** Conduct regular assessments to identify vulnerabilities in operations, supply chains, and CSR programs that could be exploited by offenders.

Child safeguarding risks are widespread in all countries, sectors, and business activities. The level and nature of these risks can vary significantly depending on the specific business operations, activities, and local context. Even within the same company, child safeguarding risks may differ from one workplace to another due to variations in operational practices, workforce composition, and community dynamics.

Given this variability, it is essential for businesses and investors to conduct a basic assessment of child safeguarding risks associated with their country context, sector, projects, and operations.⁷⁸ Such assessments enable organizations to:

- > **Identify vulnerabilities:** Understand the specific risks posed by their activities and operations.
- > **Tailor mitigation strategies:** Develop targeted safeguarding measures that address the unique challenges of each context.
- > Ensure compliance: Align practices with local laws, international standards, and best practices for child protection.
- > **Promote accountability:** Demonstrate a commitment to safeguarding children and minimizing harm.

By integrating child safeguarding assessments into their risk management processes, businesses can proactively address potential risks, protect children's rights, and contribute to sustainable and responsible operations.

Assessing risk – Child Safeguarding Risk Assessment Framework

To effectively identify and address child safeguarding risks, businesses and investors are encouraged to adopt a structured approach to risk assessment. This approach ensures a systematic evaluation of potential risks and their impacts, enabling organizations to implement targeted mitigation measures.

Steps for Conducting a Child Safeguarding Risk Assessment

1. Identify Risks:

- > Analyze business activities, operations, and supply chains to identify potential risks to children.
- > Consider country-specific factors, sector-specific vulnerabilities, and project-specific dynamics.

2. Assess Likelihood:

> Evaluate the probability of identified risks materializing based on operational practices, workforce composition, and community context.

3. Evaluate Impact:

> Assess the potential consequences of risks materializing, including harm to children, reputational damage, and legal liabilities.

4. Prioritize Risks:

> Rank risks based on their likelihood and impact to focus on the most critical areas requiring intervention.

5. Develop Mitigation Measures:

- > Design and implement safeguarding policies, procedures, and training programs to address identified risks.
- > Strengthen oversight mechanisms and monitoring systems to ensure compliance and effectiveness.

6. Monitor and Review:

> Continuously monitor safeguarding practices and review risk assessments to adapt to changing circumstances and emerging risks.

Benefits of a structured approach

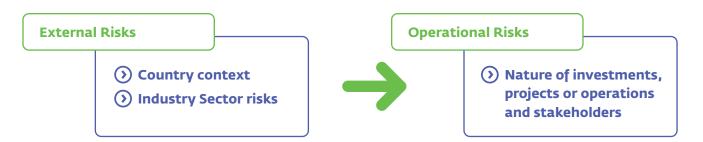
- > Consistency: Ensures a standardized process for identifying and addressing risks across all operations.
- > Proactive Management: Enables businesses to anticipate and mitigate risks before they materialize.

⁷⁸ IFC, EBRD, CDC (2020). <u>Addressing Gender Based Violence and Harassment: Emerging Good Practice for the Private Sector, European Bank for Reconstruction and Development</u>.

- > **Alignment with Best Practices:** Integrates child safeguarding into broader environmental and social risk management frameworks.
- Accountability: Demonstrates a commitment to protecting children and upholding ethical business practices.

The example provided below aligns with the principles of Environmental and Social Impact Assessment (ESIA) and introduces a risk assessment framework (Figure 4.1). This framework outlines the steps for conducting a basic assessment of child safeguarding risks associated with business activities and operations, as well as evaluating the potential impact of those risks materializing.

Figure 4.1. Risk assessment framework



The framework has been designed to streamline the assessment of diverse risk factors, to obtain a robust overview of potential child safeguarding risks and the potential consequences. It is crucial for businesses and investors to allocate time to recognize and understand the child safeguarding risks linked with different aspects of their sector, and the impact of their projects, or operations, as well as the varying contexts of different countries, and to continually monitor these conditions.

EXTERNAL RISK FACTORS

Businesses and investors must consider the country context when developing strategies to prevent child abuse and exploitation and ensure safe operations. The external operating environment in each country or local context can exacerbate risks and increase the severity and ramifications of any harm to children that occurs. Additionally, businesses do not operate in isolation—the external environment can influence how a company operates and shape its values and practices.

High-Risk Country Characteristics

Countries where children are at high risk of abuse and exploitation often share the following characteristics:

- > **Widespread poverty:** Economic hardship forces families into vulnerable situations, increasing the likelihood of exploitation.
- > Lack of education: Limited access to education reduces awareness of rights and protections, leaving children more susceptible to harm.
- > Weak legal and child protection frameworks: Inadequate laws, enforcement structures, and child protection systems create opportunities for abuse and exploitation.
- > Ineffective law enforcement: Poor oversight and enforcement emboldens offenders, who begin to assume they can abuse freely without detection or sanction.⁷⁹

⁷⁹ ECPAT (2011). Off the Radar: Protecting Children from British Sex Offenders who Travel, p.4.

These high-risk environments can negatively impact children and attract both predatory and situational offenders, who feel less inhibited and perceive fewer consequences for their actions.

Importance of Contextual Risk Assessment

Understanding the country's economic, legal, social, cultural, and security context is essential for identifying threats, risks, and emerging issues. Table 4.2 below outlines illustrative risk factors that can increase the likelihood of child abuse and exploitation being widespread and tolerated. These factors also highlight how discrimination and societal norms can hinder openness to disclosing abuse, further emboldening offenders. Additional data can be obtained from the **World Bank Gender Data Portal**.

Key Benefits of Contextual Analysis

 Risk Identification: Assessing the external environment helps businesses identify specific threats and vulnerabilities that may impact children.

- **2. Proactive Mitigation:** Understanding the context enables businesses to design targeted safeguarding measures to address local risks.
- **3. Alignment with Values:** Ensures that business operations align with ethical standards and contribute to positive social outcomes.
- **4. Accountability:** Demonstrates a commitment to operating responsibly and protecting children in highrisk environments.

By integrating country context into risk assessments, businesses and investors can better understand the external factors that influence child safeguarding risks. This approach allows for the development of informed strategies to prevent harm, mitigate risks, and operate responsibly in diverse environments.



Table 4.2 – Summary of External Risk Factors and Mitigation⁸⁰

Risk Factor	Explanation	Recommendations for Businesses and Investors
Legal age of a child Further information: World Population Review Age of Majority by Country	A low national or customary legal age for defining a child can significantly increase the vulnerability of younger children to harm. Such definitions may expose children to situations for which they are not developmentally prepared, leaving them susceptible to exploitation, abuse, and other harmful activities. Additionally, ambiguous, or inadequate legal frameworks can create loopholes that are exploited by individuals or entities seeking to engage in harmful practices involving children. **Key Risks** 1. Developmental Vulnerability: Younger children may be placed in situations—such as employment, marriage, or other adult responsibilities—that exceed their physical, emotional, and cognitive capacities, increasing their risk of harm. 2. Legal Loopholes: Ambiguities in laws and regulations stemming from low age definitions can be exploited by offenders, enabling harmful activities such as child labor, trafficking, or sexual exploitation. 3. Inconsistent Protections: A low legal age may result in gaps in child protection systems, leaving children without adequate safeguards or access to support services. 4. Normalization of Harm: Societal acceptance of lower age thresholds may perpetuate harmful practices, reducing accountability and intervention efforts.	 Align with International Standards: Adopt definitions of a child consistent with international frameworks, such as the United Nations Convention on the Rights of the Child (UNCRC), which defines a child as anyone under the age of 18. Strengthen Safeguarding Policies: Implement robust child safeguarding measures that exceed local legal requirements to ensure comprehensive protection for children. Advocate for Legal Reform: Collaborate with governments and civil society organizations to advocate for raising the legal age definition and closing loopholes in laws and regulations. Conduct Risk Assessments: Evaluate the legal and cultural context of operations to identify vulnerabilities and design targeted mitigation strategies. Educate and Train Staff: Provide training on child safeguarding and the risks associated with low legal age definitions to ensure staff are equipped to recognize and address potential harm
Age of sexual consent Further information: Age of Consent Laws by Country	Countries with a lower age of sexual consent make sex with children legal, which can place them at risk of sexual abuse or exploitation as well as significant lifelong sexual and reproductive health issues. In such contexts, behaviors or indicators of potential abuse may be overlooked or normalized by staff and society, as they are perceived to fall within legal or cultural norms. This normalization can hinder the identification and reporting of abuse, further exacerbating risks to children.	 Legal Frameworks: Understand the local laws regarding the age of sexual consent and assess how they may impact child safeguarding risks. Cultural Norms: Evaluate societal attitudes toward child sexual exploitation and abuse, particularly in contexts where harmful practices may be normalized. Training and Awareness: Equip staff with the knowledge and skills to recognize and respond to indicators of abuse, even in environments where such behaviors may be considered "normal." Advocacy: Collaborate with local stakeholders to advocate for stronger legal protections and raise awareness about the risks associated with lower ages of sexual consent. Mitigation Strategies Enhanced Monitoring: Establish systems to identify and address risks related to sexual exploitation and abuse. Policy Development: Create clear policies that exceed local legal standards to ensure children are protected. Community Engagement: Work with local communities to challenge harmful norms and promote child protection.

⁸⁰ Adapted from IFC, EBRD, CDC (2020). <u>Addressing Gender Based Violence and Harassment: Emerging Good Practice for the Private Sector, European Bank for Reconstruction and Development</u>, p. 19-20.

Risk Factor	Explanation	Recommendations for Businesses and Investors
Human rights rating is poor Further information: Freedom House Countries and Territories	Poor human rights indicators often reflect systemic inequalities and the discriminatory treatment of marginalized groups – based on factors such as race, ethnicity, gender, disability, or socio-economic status – within a society. These inequalities can create significant power imbalances – such as inequalities in access to resources, education, and legal protections – and create environments where children are more susceptible to harm from those in positions of authority or privilege. Such risks are exacerbated for children within marginalized groups. Additionally, in societies with weak human rights protections, harmful practices such as child labor, trafficking, and harassment may be overlooked or tolerated, further endangering children.	 Assess Human Rights Context: Evaluate human rights indicators in the country or region of operation to understand the treatment of marginalized groups and the potential impact on children. Promote Equality: Implement policies and practices that actively promote inclusion and equality, reducing power imbalances and safeguarding children. Engage Communities: Work with local stakeholders to address systemic inequalities and advocate for stronger protections for marginalized groups. Strengthen Safeguarding Measures: Develop robust child safeguarding frameworks that account for the heightened risks faced by children in marginalized communities.
Gender and sex inequality is high Further information: OECD Social Institutions and Gender Index (SIGI)	Widespread discrimination against women, girls, and individuals – including men and boys – who do not conform to traditional gender norms significantly increases their vulnerability to abuse, exploitation, and harassment. This systemic inequality often limits access to reporting mechanisms and support services, further perpetuating harm and reducing opportunities for intervention and protection. **Key Impacts of Gender-Based Discrimination** 1. Heightened Vulnerability: Discrimination creates environments where marginalized individuals are more likely to experience abuse and exploitation due to societal power imbalances and lack of protections. 2. Barriers to Reporting: Fear of stigma, retaliation, or disbelief often discourages individuals from reporting violations. 3. Limited Access to Support Services: Marginalized groups may face challenges accessing essential services, such as health care, legal aid, and psychosocial support, due to systemic exclusion or lack of resources tailored to their needs, particularly in contexts where gender norms are rigidly enforced.	 > Promote Gender Equality: Implement policies and practices that actively challenge gender-based discrimination and foster inclusive environments. > Strengthen Reporting Mechanisms: Ensure accessible, confidential, and nondiscriminatory channels for reporting violations, with specific measures to support marginalized groups. > Enhance Support Services: Collaborate with local stakeholders to improve access to services for survivors of abuse and exploitation, including tailored interventions for individuals facing gender-based discrimination. > Raise Awareness: Conduct training and awareness campaigns to educate staff and communities about the harmful impacts of gender-based discrimination and the importance of safeguarding vulnerable individuals.
Attitudes toward abuse against children Further information: UN Dispatch Rankings by Country	When abuse against children is normalized or accepted within a community or society, it creates a dangerous environment where harmful behaviors are allowed to persist unchecked. This normalization leads to a reluctance to report or intervene in cases of abuse, enabling perpetrators to continue their abusive actions with impunity: perpetuating cycles of harm. **Key Consequences of Normalized Abuse** 1. Reluctance to Report: Societal acceptance of abuse discourages individuals, including victims and witnesses, from reporting incidents due to fear of stigma, retaliation, or disbelief. 2. Lack of Intervention: Communities may fail to act or intervene in abusive situations, viewing them as culturally or socially acceptable rather than harmful. 3. Perpetrator Impunity: The absence of accountability allows offenders to continue their abusive behavior without fear of consequences, further emboldening them. 4. Cycle of Harm: Normalization perpetuates systemic abuse, creating environments where children are consistently exposed to exploitation and harm.	 Raise Awareness: Partner with local stakeholders to challenge harmful norms and educate communities about the importance of child safeguarding. Strengthen Reporting Mechanisms: Develop accessible and confidential channels for reporting abuse, ensuring victims and witnesses feel safe and supported. Advocate for Accountability: Collaborate with governments and organizations to strengthen legal frameworks and enforcement mechanisms that hold perpetrators accountable. Implement Safeguarding Policies: Establish clear policies and procedures within business operations to prevent abuse and protect children. Engage Communities: Work with local leaders and organizations to foster cultural change and promote zero tolerance for child abuse.

Risk Factor	Explanation	Recommendations for Businesses and Investors
Rate of child marriage is high Further information: UN Women EVAW-global database	The age of marriage is often closely tied to the age of consent for sexual activity, creating significant implications for child safeguarding. Child marriage is not only an indicator of societal acceptance of sex with a child but also reflects broader issues such as the denial of bodily autonomy for girls and limited access to education. These factors collectively contribute to harm and perpetuate cycles of vulnerability and inequality. **Key Risks Associated with Child Marriage** 1. Acceptance of Sexual Activity with Children: Societal norms that permit child marriage implicitly condone sexual activity with children, exposing them to physical, emotional, and psychological harm. 2. Violation of Bodily Autonomy: Child marriage undermines girls' ability to make decisions about their own bodies, often subjecting them to coercion, abuse, and exploitation. 3. Impact on Education: Girls who are married as children are often forced to leave school, limiting their opportunities for personal and economic development and perpetuating cycles of poverty and dependence. 4. Health Risks: Early marriage increases the likelihood of complications from pregnancy and childbirth, as well as long-term sexual and reproductive health issues.	 Align with International Standards: Support global frameworks such as the United Nations Convention on the Rights of the Child (UNCRC) and Sustainable Development Goal 5, which aim to eliminate child marriage and promote gender equality. Advocate for Legal Reform: Collaborate with governments and civil society organizations to raise the legal age of marriage and strengthen protections against child marriage. Promote Education: Invest in programs that support a girl's access to education and empower her to make informed decisions about her futures. Raise Awareness: Conduct community engagement initiatives to challenge harmful norms and promote the importance of bodily autonomy and gender equality. Implement Safeguarding Policies: Ensure business operations and supply chains do not inadvertently contribute to practices that perpetuate child marriage or related harms.
Rate of child labor is high Further information: UNICEF Child Labour Statistics	Child labor exposes children to significant physical, psychological, and social risks, undermining their well-being and future opportunities. Beyond the immediate harm, child labor often deprives children of their right to education, limiting their ability to achieve socio-economic advancement and perpetuating cycles of poverty and inequality. Employers may exploit children by subjecting them to abuse, withholding wages, or forcing them into hazardous working conditions.	 Adopt International Standards: Align operations with global frameworks such as the International Labour Organization (ILO) Conventions No. 138 (Minimum Age) and No. 182 (Worst Forms of Child Labour). Strengthen Safeguarding Policies: Implement robust child safeguarding measures to prevent child labor in business operations and supply chains. Conduct Risk Assessments: Evaluate supply chains and operations to identify and mitigate risks of child labor, particularly in high-risk countries and sectors. Promote Access to Education: Support initiatives that provide children with access to high-quality education and vocational training, reducing reliance on child labor. Collaborate with Stakeholders: Partner with governments, NGOs, and local communities to advocate for stronger legal protections and enforcement mechanisms. Monitor and Enforce Compliance: Regularly audit suppliers and contractors to ensure adherence to child labor laws and ethical standards

Risk Factor	Explanation	Recommendations for Businesses and Investors
Child trafficking: source or destination country Further information: World Population Review Child Trafficking by Country	Child trafficking is a grave violation of human rights, driven by vulnerabilities such as poverty and inadequate protection systems. In source countries, these factors create environments where children are at heightened risk of being trafficked for various exploitative purposes, including forced labor and sexual exploitation. In destination countries, the demand for cheap labor in sectors such as agriculture, manufacturing, and construction further fuels this issue. Traffickers exploit these economic demands by deceiving children and their families with false promises of employment, education, or a better life. Once trafficked, children are subjected to abuse, exploitation, and conditions that strip them of their dignity and rights. Key Contributing Factors 1. Source Country Vulnerabilities: Poverty: Economic hardship forces families into desperate situations, making them susceptible to traffickers' false promises. Weak Protection Systems: Inadequate legal frameworks and enforcement mechanisms fail to safeguard children from trafficking risks. 2. Destination Country Demand: Cheap Labor: Industries such as agriculture, manufacturing, and construction rely on low-cost labor, creating opportunities for traffickers to exploit children. Exploitation of Economic Gaps: Traffickers capitalize on the disparity between source and destination countries, using deceptive recruitment practices to lure victims.	 Conduct Supply Chain Audits: Ensure operations and suppliers are free from exploitative practices, including forced labor and trafficking. Strengthen Safeguarding Policies: Implement robust child protection measures across all business activities and partnerships. Collaborate with Stakeholders: Partner with governments, NGOs, and local communities to address vulnerabilities in source countries and reduce demand in destination countries. Raise Awareness: Educate employees, suppliers, and communities about the risks and indicators of child trafficking. Advocate for Legal Reform: Support stronger legal frameworks and enforcement mechanisms to protect children from trafficking.
Child sex tourism destination Further information: Sage Journal A Cross-National Comparison of Destination Countries and Non-Destination Countries	Child sex tourist destinations are locations where individuals travel on holiday and/or with work and engage in commercial sexual activities with children. Although tourism can bring economic benefits to local communities, it can also create environments where children are exposed to exploitation and harm. In some cases, these destinations may attract individuals seeking to exploit children through commercial activities, including labor, entertainment, or other services. Vulnerabilities are exacerbated in areas with weak law enforcement, inadequate child protection systems, and limited oversight of tourism-related industries. Key Risks 1. Exploitation in Tourism-Related Activities: - Children may be employed in unsafe or exploitative conditions in sectors such as hospitality, entertainment, or informal labor markets. - Lack of regulation and oversight can lead to abuse and exploitation. 2. Weak Legal and Protection Frameworks: - Destinations with insufficient child protection systems and weak enforcement of laws are more likely to see exploitation thrive. - Perpetrators may exploit gaps in legal frameworks to avoid accountability. 3. Underground Markets: - In some locations, underground markets for exploitative activities involving children may emerge, fueled by demand from tourists.	 Implement Safeguarding Policies: Develop and enforce child protection policies across all tourism-related operations and partnerships. Conduct Risk Assessments: Evaluate the local context to identify vulnerabilities and risks to children in tourism-related activities. Collaborate with Local Authorities: Partner with governments and NGOs to strengthen child protection systems and law enforcement in tourist destinations. Raise Awareness: Educate tourists, employees, and local communities about the risks of exploitation and the importance of safeguarding children. Monitor and Enforce Compliance: Regularly audit operations and supply chains to ensure adherence to child protection standards

Risk Factor	Explanation	Recommendations for Businesses and Investors
Child protection framework is weak Further information: ICMEC Child protection legislation by country	The ineffective implementation and weak enforcement of existing laws significantly increase the risks faced by vulnerable children. Poorly enforced legal frameworks result in underreporting of abuse and exploitation, allowing perpetrators to act with impunity. Additionally, the absence of adequate services or the lack of capacity within existing systems further exacerbates the challenges in protecting and supporting vulnerable children. **Key Challenges** 1. Underreporting of Abuse: - Weak enforcement discourages victims and witnesses from reporting incidents due to fear of retaliation, stigma, or lack of trust in the system. - Limited awareness of rights and protections among vulnerable populations contributes to the low reporting rates. 2. Perpetrator Impunity: - Poorly implemented laws create environments where offenders face few consequences for their actions—or none—emboldening them to continue abusive behaviors. - Gaps in legal frameworks and enforcement mechanisms hinder accountability and justice for victims. 3. Inadequate Support Services: - The absence of specialized services, such as health care, psychosocial support, and legal aid, leaves vulnerable children without the resources they need to recover and rebuild their lives. - Existing services often lack the capacity, funding, or trained personnel to address the scale and complexity of child safeguarding needs.	 Advocate for Stronger Enforcement: Collaborate with governments and civil society organizations to strengthen the implementation and enforcement of child protection laws. Support Capacity Building: Invest in initiatives that enhance the capacity of local services to support vulnerable children, including training personnel and funding for essential resources. Develop Safeguarding Policies: Implement robust child safeguarding measures within business operations and supply chains to mitigate risks and protect children. Raise Awareness: Conduct community engagement programs to educate stakeholders about the importance of reporting abuse and accessing support services.

Risk Factor	Explanation	Recommendations for Businesses and Investors
Poverty and discrimination are high Further information: World Population Review Poverty Rate by Country	Children's vulnerability to exploitation is exacerbated by systemic factors that restrict their access to information and resources needed to seek help. These barriers not only increase the likelihood of abuse and exploitation but also limit children's ability to escape harmful situations and access support services. Key Factors Increasing Vulnerability 1. Lack of Awareness: Limited access to education and information about rights and protections leaves children unaware of how to identify exploitation or seek help. Cultural norms or societal stigma may discourage children from recognizing abusive behaviors as unacceptable. 2. Restricted Access to Resources: Inadequate availability of child-friendly reporting mechanisms, health care, legal aid, and psychosocial support prevents children from accessing the help they need. Geographic isolation, particularly in rural or remote areas, further limits access to essential services. 3. Power Imbalances: Exploitation often thrives in environments where children are dependent on adults for care, resources, or employment, making it difficult for them to challenge abusive behaviors. Discrimination based on gender, disability, ethnicity, or socio-economic status can further marginalize children and increase their vulnerability. 4. Weak Legal and Protection Frameworks: Poorly enforced laws and inadequate child protection systems fail to safeguard children and hold perpetrators accountable. Fear of retaliation or disbelief discourages children from reporting abuse.	 Promote Awareness: Support initiatives that educate children, families, and communities about their rights, protections, and available resources. Strengthen Reporting Mechanisms: Develop accessible, child-friendly channels for reporting abuse, ensuring confidentiality and safety. Enhance Support Services: Partner with local organizations to improve access to health care, legal aid, and psychosocial support for children in vulnerable situations. Address Discrimination: Implement policies that promote inclusion and equality, reducing barriers that prevent marginalized children from accessing help. Advocate for Legal Reform: Collaborate with governments to strengthen child protection laws and enforcement mechanisms.

Risk Factor	Explanation	Recommendations for Businesses and Investors
Corruption Further information: Transparency International Country data	Corruption among local authorities—including government officials, police, and security services—significantly undermines efforts to combat abuse and violence against children. When corruption is prevalent, it reduces the effectiveness of enforcement actions, weakens accountability mechanisms, and creates an environment where perpetrators can act with impunity. **Key Impacts of Corruption** 1. Reduced Enforcement of Laws: - Corruption within law enforcement and judicial systems leads to the neglect or dismissal of cases involving abuse and violence against children. - Perpetrators may bribe an official to avoid investigation, prosecution, or punishment, emboldening them to act with greater impunity. 2. Impunity for Perpetrators: - Corruption enables offenders to exploit gaps in accountability, allowing them to continue abusive behaviors without fear of consequences. - Victims and their families may lose trust in authorities, discouraging them from reporting abuse or seeking justice. 3. Barriers to Support Services: - Corruption can divert resources away from child protection services, leaving vulnerable children without access to essential support such as health care, legal aid, and psychosocial assistance. - Mismanagement of funds intended for child safeguarding programs further exacerbates systemic failures. 4. Erosion of Public Trust: - Widespread corruption undermines public confidence in government institutions, reducing community engagement in efforts to protect children.	 Advocate for Transparency: Support initiatives that promote transparency and accountability within local authorities and law enforcement agencies. Collaborate with Civil Society: Partner with NGOs and community organizations to strengthen independent oversight and monitoring of child protection systems. Implement Anti-Corruption Policies: Develop and enforce robust anticorruption measures within business operations and supply chains to ensure ethical practices. Support Capacity Building: Invest in training and resources for local authorities to improve their ability to respond to abuse and violence effectively.

Risk Factor	Explanation	Recommendations for Businesses and Investors
Climate change and natural disasters Further information: Resource Watch Climate Risk Index	Countries experiencing the effects of climate change and natural disasters face heightened risks of displacement and family separation, which significantly increase the dangers of trafficking, exploitation, and abuse for children. These crises disrupt social systems, including access to education and health care, and exacerbate vulnerabilities, leading to higher rates of child labor, early marriage, and neglect. **Key Impacts of Climate Change and Natural Disasters on Children** 1. Displacement and Family Separation: - Natural disasters and climate-related events often force families to flee their homes, leading to separation and leaving children unaccompanied or in unstable environments. - Displaced children are at greater risk of trafficking, exploitation, and abuse due to their lack of protection and oversight. 2. Disruption of Education and Health care: - Damage to infrastructure and social systems can limit access to schools and health care facilities, depriving children of essential services. - Prolonged disruptions can lead to school dropout, reducing opportunities for future socio-economic advancement. 3. Increased Vulnerability to Harmful Practices: - Economic hardship caused by climate crises can push families to rely on child labor or resort to early marriage as a coping mechanism. - Neglect and lack of supervision in disaster-affected areas further expose children to exploitation and abuse.	 Support Disaster Response Efforts: Partner with governments and NGOs to provide immediate relief and protection for displaced children and families. Invest in Resilient Infrastructure: Develop and support projects that strengthen community resilience to climate change and natural disasters, ensuring access to education and health care during crises. Implement Safeguarding Measures: Integrate child protection policies into disaster response and recovery efforts to prevent trafficking, exploitation, and abuse. Promote Economic Stability: Support initiatives that provide families with sustainable livelihoods to reduce reliance on harmful practices such as child labor and early marriage.

Risk Factor	Explanation	Recommendations for Businesses and Investors
Fragility and conflict Further information: The Fund for Peace Fragile States Index	Fragility and conflict create environments where families struggle to meet their basic needs, such as food, shelter, and security. These dire circumstances significantly increase vulnerability to sexual exploitation, including situations where individuals, including children, may be coerced into exchanging sexual acts for survival essentials. Such exploitation perpetuates cycles of harm and deepens the challenges faced by already vulnerable populations. Key Impacts of Fragility and Conflict 1. Increased Vulnerability to Exploitation: Families facing extreme poverty and insecurity may resort to harmful coping mechanisms, including survival sex, to meet their basic needs. Children, particularly girls, are at heightened risk of being coerced or manipulated into exploitative situations. Breakdown of Social Protections: Fragile and conflict-affected areas often lack functioning child protection systems, leaving children without safeguards against exploitation. Weak law enforcement and judicial systems allow perpetrators to act with impunity. Psychological and Physical Harm: Sexual exploitation causes severe physical and emotional trauma, with long-term consequences for children's health, well-being, and development. Stigma and discrimination against survivors further isolate them and limit access to support services.	 Support Humanitarian Efforts: Partner with governments and NGOs to provide immediate relief, including food, shelter, and security, to families in conflict-affected areas. Strengthen Child Safeguarding Measures: Implement robust policies to prevent exploitation in business operations and supply chains, particularly in fragile contexts. Advocate for Legal Protections: Collaborate with stakeholders to strengthen legal frameworks and enforcement mechanisms to protect children from exploitation. Invest in Community Resilience: Support programs that provide sustainable livelihoods and education to reduce reliance on harmful coping mechanisms.
Industry sector	Specific risks are associated with different industry sectors, reflecting the nature of the sector.	See Section 3 of this GPN

OPERATIONAL RISK FACTORS

Nature of investment, project, or operations

Businesses and investors must acknowledge the potential impacts their investments, projects, or operations may have on children to effectively implement strategies that prevent harm. This requires a thorough reflection on the nature of the work, how it is delivered, and the environments it

Figure 4.2. Child Rights & Business Principles framework

creates, ensuring adjustments are made to foster a safer and more protective setting for children.

The framework of the Children's Rights and Business Principles (CRBP) can be used when examining and evaluating risks in three key areas that cover core business operations, wider activities, and supply chains (see Figure 4.2)81.



Considering these three areas can be helpful to assess what and where risk factors exist that can create circumstances where child safeguarding risks emerge or are heightened, and children negatively impacted. Examples of risk factors include:

- Workplace: Lack of child safeguarding policies and procedures, dependency on informal networks or subcontractors, complex supply chains, unsecured facilities, inadequate supervision.
- > Marketplace: Exploitative content, manipulative, or deceptive advertising techniques to influence children's preferences and behavior—and elicit personal data without adequate consent or safeguards—resulting in privacy concerns and unregulated marketplaces.

> Community and environment: Dominance of the informal economy, poor infrastructure, services and utilities, labor influx, land acquisition and involuntary resettlement.

Risk assessments should rely on recent and substantiated primary data such as community mapping and feedback from stakeholder consultations. The importance of accurate and current information cannot be overstated, especially considering the dynamic nature of situations, such as population movements prior to project implementation or gaps in data regarding vulnerable children and groups within business-affected communities, which can significantly impact the effectiveness of child safeguarding mitigation measures. 82

⁸¹ Global Child Forum (2020). <u>Implementing a children's rights perspective: a workbook for business</u>, p. 11

⁸² IFC (2012). <u>Guidance Note 1: Assessment and Management of Environmental and Social Risks and Impacts</u>.

Data constraints, such as the scope, reliability, assumptions, deficiencies, and uncertainties in forecasts, must be clearly outlined. For projects with distinct physical components, it is crucial to identify the extent and complexity of potential adverse impacts and risks within the project's entire area of influence. This includes all areas affected by on-site and offsite activities, assets, facilities, and related infrastructure.⁸³

Business project risk factors can include but are not limited to:84

- > Project activities that may be perceived to challenge existing gender/social norms.
- > Project activities that change the power structures or incentives on the ground, such as prices for commodities, changes in availability of services/supplies, or payments that change power/roles.
- > Lack of child safeguarding training, protocols, monitoring, and sanctions for employees or contractors.
- > Lack of capacity to supervise employees or contractors.
- > Unclear expectations of child safeguarding requirements that extend to third parties (such as contractors and suppliers).
- > Children living in or near the project site—including children belonging to at-risk groups—putting them at greater risk of harm.⁸⁵
- > Lack of a child-friendly grievance mechanism⁸⁶ and protocols at the project level to respond to child abuse and exploitation, limited knowledge of these mechanisms, or fear of retribution for reporting incidents of harm.

 Lack of child protection service providers that child victims, survivors, and others such as parents and bystanders can easily, safely, and confidentially access.

KEY STAKEHOLDERS

Stakeholder Engagement for Child Safeguarding

To effectively identify where a business directly or indirectly interacts with children and to thoroughly assess child safeguarding risks and impacts, stakeholder engagement is essential. In many jurisdictions, companies have both legal and ethical obligations to engage with relevant stakeholders when addressing child safeguarding risks. Businesses are therefore encouraged to identify and engage with a diverse range of stakeholders to ensure a comprehensive approach.

Key Stakeholders

Stakeholders include both local communities directly affected by the project (Affected Communities), such as children and families, and those indirectly involved or with an interest in the project. These may include investors, business owners, national and local authorities, neighboring projects, and nongovernmental organizations (NGOs) or local child protection experts⁸⁷.

Key stakeholders often bring diverse perspectives and expertise on child safeguarding issues. Collaborating with these stakeholders enables businesses to:

- > Identify vulnerable children at risk of adverse impacts.
- > Pinpoint potential sources of harm.
- > Assess the likelihood and severity of harm.
- > Consider legal implications and resource availability.

⁸³ As previous footnote.

⁸⁴ Adapted from the World Bank (2022). Good Practice Note: Addressing Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) in Human Development
Operations 2, 16

⁸⁵ At-risk groups include children in care; children living in poverty, child-headed households, child workers or street children, children in early marriages or young mothers, children with disabilities, children who belong to sexual and/or gender minorities, child victims and survivors of abuse and sexual exploitation, children belonging to armed groups, children living with HIV, and children in organized crime networks. Intersectionality with race and ethnic groups can also constitute additional risks.

⁸⁶ Note that in relation to child safeguarding, the term'reporting mechanism' is typically used instead of grievance mechanism. Grievance mechanism is used in this paper to align with IFC standards.

⁸⁷ IFC (2012). Performance Standard 1: Assessment and Management of Environmental and Social Risks and Impacts, para 1.

Engaging stakeholders also fosters broader buy-in and enhances the effectiveness of child safeguarding prevention efforts.⁸⁸

It is important to bear in mind that in cases where activities pose a high risk of child abuse or exploitation, or where children are direct recipients of services, consultations with children are recommended. However, such consultations

must be conducted with the utmost care. It is critical to involve child safeguarding or child protection experts to prevent any potential harm during the consultation process and to establish appropriate protocols.

For further guidance, Annex E provides a summary of ethical considerations for consulting with children.

Summary of suggested key questions for business operations and activities:

- > What is the key business operation, product or activity?
- > Where is the physical presence, the office, or where employees work?
- > What are the wider operational business relationships (for example, supply chain activities, distribution and so forth)?
- > Where and how are products and services sold and used?
- > What business functions are involved (for example, human resources, legal, procurement, consultancy, developers, marketing, design, information technology)?
- > What aspects will affect children up to the age of 18?
- > Who will it affect? Which groups of children?
- > What are the potential consequences for children?
- > What is the likely or actual impact? Is it positive, negative or neutral?
- > What is the evidence? How have the views and experiences of children been included?

Adapted from UNICEF UK (2021). Child rights impact assessment: template and guidance for local authorities, p. 12.

⁸⁸ IFC, EBRD, CDC (2020). <u>Addressing Gender Based Violence and Harassment: Emerging Good Practice for the Private Sector, European Bank for Reconstruction and Development</u>.

Step Two: Assess Business Capacity and Competency

After identifying child safeguarding risks and impacts arising because of the business or activities proposed (outlined in Step 1), the next step is an assessment of the company's capacity and competency to manage child safeguarding risks. Core aspects of business capacity and resources will need to be assessed. However, this assessment, and any consequent mitigation actions, should be balanced against the risks to children identified in Step 1. For example, a small company whose activities do not impact on children may not feel it is proportionate to develop processes which would be required of a business which runs several large schools. Areas to be assessed include:89

- > Leadership and business culture: to motivate and oversee action and to establish a positive organizational culture which places the best interests of children above all other considerations.
- > Zero tolerance policies and code of conduct: to publicly state child safeguarding commitments and to define acceptable and unacceptable behaviors, with the consequence of sanctions (including dismissal) for violations.
- > Stakeholder engagement: to ensure diverse perspectives and expertise on child safeguarding issues and risks and provide valuable input on available resources and support mechanisms.

- Recruitment practices: to ensure safe recruitment, for example background checks, to avoid negligent hiring of unsuitable personnel.
- > **Training and awareness raising:** to acquire knowledge and promote attitude and behavioral change.
- Working with contractors and suppliers: to clarify roles and responsibilities and ensure safe partnerships.
- > **Grievance and case handling mechanisms:** to enable reporting and safe follow-up for children managed by personnel trained to address cases of child abuse.
- > Monitoring, learning and improvement: to identify risks, learn from experience, demonstrate impact, and contribute to continuous improvement.

A lack of capacity and resources in any of these areas can increase child safeguarding risks and leave businesses ill-equipped to respond effectively (see Step 4 for more information).

Investors can incorporate such an assessment into their appraisal and E&S due diligence processes. Businesses can conduct capacity and resource assessments during the project or operational design phase or include them in ongoing internal processes.

Step Three: Conduct In-depth Assessments for High-risk Operations and Sectors

Whether a more in-depth assessment is necessary may be obvious from the outset (for example the nature of the business operations or sector) or may emerge through the process of carrying out the assessment of safeguarding risks and capacities (Steps 1 and 2). In either case, the basic assessment of child safeguarding risks and business capacity and resources covered in Steps 1 and 2 can be used as a starting point to determine the scope of an in-depth assessment of child safeguarding risks.

⁸⁹ Adapted from IFC, EBRD, CDC (2020). <u>Addressing Gender Based Violence and Harassment: Emerging Good Practice for the Private Sector, European Bank for Reconstruction and Development</u>.

An in-depth assessment of child safeguarding is recommended when businesses or investors can see significant child safeguarding risks implied by the country and sector risk profile and the nature of business operations (Step 1), and/or gaps and vulnerabilities in the business capacity and resources to proactively prevent and respond to child safeguarding issues and mitigate risks (Step 2).

When a thorough in-depth assessment of child safeguarding risks is necessary, it should be conducted by a specialized child safeguarding or protection expert with the requisite experience, skills, and knowledge to ensure it is carried out sensitively and safely. If a child safeguarding/protection expert is not available locally, it may be necessary to identify

a regional or international expert to conduct the in-depth assessment. Ideally, they will have experience of the country context; however, this is not essential if they are working with others who have knowledge of the country's economic, legal, social, cultural and security context. 90

If it is difficult to find and hire a child safeguarding expert, postpone the assessment rather than entrusting it to someone without the requisite skills and experience. This is especially important if conducting an in-depth assessment without expertise can cause serious harm or distress to children involved, heightening risks for them and others involved.⁹¹

Child safeguarding assessment - requisite skills and experience

- > Knowledge of global child safeguarding standards and guiding principles.
- > Familiarity with legal obligations including reporting requirements.
- > Knowledge of child rights, the root causes of child abuse and the different forms it can take, and the impact on children.
- > Knowledge of specific contexts that increase the risk of harm to children.
- > Experience of assessing, designing, and/or implementing approaches to prevent and mitigate risks.
- > Experience of assessing, designing, and/or implementing child-friendly grievance mechanisms

Step Four: Implement Prevention and Response Measures to Safeguard Children

There are a multitude of actions that businesses can adopt to promote child safeguarding effectively. This includes both prevention and response measures. Where possible, to avoid duplication and confusion, it is suggested that child safeguarding measures are integrated into existing organizational systems and structures. As mentioned earlier, actions taken should be proportional to the level of risk to children. Nevertheless, it is recommended that all business

should know how to respond to a safeguarding concern, and there should be proportionate and sufficient mechanisms (such as grievance and complaints procedures) and referral pathways in place to ensure that incidents and cases can be reported safely and when necessary, referred (routed onward) for support. Annex C details considerations for establishing new grievance mechanisms or adapting existing ones for child safeguarding.

⁹⁰ As previous footnote, p.83.

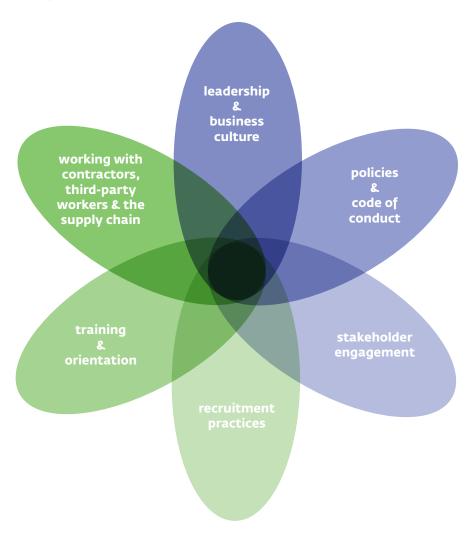
⁹¹ As previous footnote, p.41.

A preventive approach is a critical component of safeguarding, rooted in the underlying principle of acting before harm occurs (see Figure 4.3 below). Therefore, preventive measures are essential for all projects with any impact on children (direct or indirect) and should be adapted to suit the extent and scope of businesses' engagement with children. For organizations employing

minors (individuals under 18 years old), implementation of child safeguarding measures should be obligatory (for example, as outlined in the IFC's PS2 on Labor and Working Conditions). 92

Prevention measures for businesses can be categorized into the following key areas:

Figure 4.3. Six Dimensions of Prevention



As a general point, to be effective, any personnel with designated responsibility for child safeguarding, including management representatives, must have clear lines of

responsibility and authority. Additionally, effective child safeguarding requires strong management support and adequate allocation of human and financial resources.⁹³

⁹² IFC (2012). Performance Standard 2: Labor and Working Conditions, para 21.

⁹³ As previous footnote, para 17.

LEADERSHIP AND BUSINESS CULTURE

Leadership is at the front and center of all prevention work, setting the tone and modelling the principles and standards expected of everyone in the business. 94 Leaders play a vital role in shaping the culture and priorities of the organization and implementing robust child safeguarding measures. It is the responsibility of leadership to ensure that the business minimizes the risk of harm to anyone, including children, in the process of its operations. Consequently, they should ensure that child safeguarding is seen as a priority and that child safeguarding measures are integrated into organizational operations, contributing to improved sustainability.

Examples of actions leaders can take include:

- > Make a clear commitment to child safeguarding.
 - Commitment and oversight of the management of child safeguarding measures at the senior level is crucial for successful implementation of child safeguarding measures. Without that commitment, expressed at a senior level, child safeguarding measures may be seen as less important, or even optional. Making a commitment to child safeguarding means that senior management understands the risks related to child safeguarding, oversees implementation of necessary measures and monitors progress.
- > Foster an organizational culture that incorporates child safeguarding. Changes may need to be made to the culture of the organization, so that child safeguarding is considered relevant and important to the organization: this entails being open and transparent about its measures and how it addresses concerns and incidents. Organizational culture is determined by a range of factors including management and leadership style, focus of business and, in some cases, where it is located.95

A commitment to respect children's rights is closely related to the overarching values of the business and its broader environmental and social sustainability strategy,

building on ongoing efforts in this area. A shift of organizational culture can be accomplished through:

- Integration of child safeguarding measures into the organization's mission, vision, and value.
- Clear and consistent communication on the importance of child safeguarding, allowing space for all personnel to discuss it and ask questions.
- Attention to child safeguarding in policies, procedures, and operations.

> Commit to continuous oversight of critical

- Provision of essential resources (including financial), training and orientation.
- matters. Regular updates on child safeguarding issues should ideally be communicated to the Board of Directors, with urgent matters being brought to their attention immediately. A clear process should be in place outlining issues which need to be reported to the Board on a (suggested) quarterly basis. It is recommended that a focal point for child safeguarding is appointed among the directors to ensure all staff are aware of the importance

of the matter and to ensure adequate responsibility at the

POLICIES AND CODE OF CONDUCT

leadership level.

On the basis of the risk assessment, high-risk businesses and operations should put in place a child safeguarding policy that clearly affirms commitment and outlines the responsibilities of employees, contractors, subcontractors, paid and nonpaid associates, and service providers in this area. A child safeguarding policy (which can be standalone or integrated in other policies) establishes a comprehensive commitment to preventing harm to children and outlines the measures in place to achieve this objective. The child safeguarding policy should reference wider organizational policies and procedures (such as human resources, HR), with child safeguarding measures integrated into all business areas, including the broader organizational risk management processes.

 $^{^{94}\,}$ As previous footnote, p. 6.

⁹⁵ Adapted from Keeping Children Safe (KCS). <u>The International Child Safeguarding Standards</u>, p.26.

Policies should reflect the right of children to protection from abuse and exploitation as outlined in the <u>United</u>

Nations Convention of the Rights of the Child (UNCRC). Child safeguarding commitments must be included in all relevant policies, Code of conduct, business principles, mission and vision, and any environmental and social commitments. 96

Existing policies and procedures can be adapted to integrate child safeguarding, and new policies and procedures may need to be introduced. Operational systems and processes, including risk assessment and quality assurance systems, program and project design and implementation and reporting processes, should then be adjusted accordingly.

It is suggested that businesses require all personnel working for, or on behalf of, the business to adhere to a Code of Conduct. A Code of Conduct outlines acceptable and unacceptable behaviors and practices, including with regard to children, for all individuals employed or engaged by the organization. Annex F contains more information on developing appropriate Codes of Conduct relating to child safeguarding. Codes of Conduct should explicitly prohibit sexual activity with individuals under the age of 18 and clarify that mistaken beliefs regarding a child's age or their ability to consent to sexual activities are not valid defences. Where there are instances of employees who are already married to somebody under the age of 18 years old, especially if cultural practices make prohibition difficult or risk community backlash, 97 it will be important to carefully consider how to manage such situations.

Rather than developing a separate Code of Conduct dedicated to child safeguarding, a relevant clause can be included in the Code of Conduct covering broader issues, unless children are at high risk, in which case a dedicated, detailed Code of Conduct would avoid confusion. It is recommended that as well as providing guidance on appropriate behavior toward children, the Code of Conduct should also include sanctions for violation.

Once the child safeguarding policy is finalized, it should be approved by the organization's management body. The policy should be publicized and promoted extensively, implementation should be monitored, and policies reviewed on a regular basis.

STAKEHOLDER ENGAGEMENT

Child safeguarding issues should be integrated into consultations with stakeholders to understand the needs of the communities and the risks they are facing. 98 Early identification of key stakeholders facilitates the business planning processes. Stakeholder engagement process activities should be refreshed periodically given that relevant situations can change unexpectedly.

Key stakeholders who can advise on the situation for children include child-focused organizations, individuals who represent children, caregivers, school staff, parent groups, youth groups, faith, and community leaders. It is important to promote inclusive stakeholder engagement, recognizing that children may be impacted differently than adults; engaging with experts will yield insights into the impact business operations may have on children and the best way to mitigate any risks. This includes the ways in which children can safely report concerns (see Annex C).

Businesses need to share their commitment to child safeguarding and provide publicly accessible information on available protective structures and response services in appropriate ways that take account of local context and cultures. This will enable communities (including children) to understand what standards of behavior they can expect, how to report any violations of expected behavior or safeguarding concerns, what happens next, their rights and what support is available to them. Promoting adequate treatment of children's issues and prioritizing their well-being helps

⁹⁶ As previous footnote.

⁹⁷ IFC (2023). How to support your company to write and implement an employee code of conduct for prevention of sexual exploitation and abuse.

⁹⁸ It is important to understand all issues affecting children's rights, including the pre-existing context and its implications for children's rights and identification of any substantial risks they face, including child labor and sexual exploitation, abuse and other forms of harm.

mitigate risks associated with child safeguarding and fosters positive relationships with communities. 99

As mentioned previously, consideration should be given to consulting directly with children, whenever business operations are identified as posing a high risk of child abuse, when children are direct recipients of services, or when there is any risk of revictimization.¹⁰⁰

RECRUITMENT PRACTICES

Strong recruitment practices, ¹⁰¹ which involve robust reference and criminal background checks, can act as a powerful deterrent for predatory offenders seeking opportunities to gain access to children. ¹⁰² The values of the business and its commitment to child safeguarding measures should be emphasized during the recruitment process to ensure that only individuals who align with the business's values are employed. Special measures must be implemented for personnel who have direct contact with children, whether through their role or Corporate Social Responsibility (CSR) activities.

There are a number of ways that businesses can strengthen their recruitment processes; these are partly dependent on location, but could include:

- > Job descriptions and advertisements should explicitly reference the business' child safeguarding policy and expected behaviors.
- > Interviews provide an opportunity to assess candidates' attitudes toward children's rights and their past behavior, including their views on sexual relationships with individuals under 18 years old and on early marriage, among other areas.
- > All staff should undergo mandatory background checks, including obtaining at least two references from previous managers, peers, or employers.

- In addition to performance-related inquiries, questions regarding substantiated cases of child abuse should be included in background checks.
- > Contracts should include the business's child safeguarding policy and expected behaviors as well as the Code of Conduct.
- All new staff should be trained on the importance of child safeguarding.

Annex G contains more information on safer recruitment practices.

TRAINING AND ORIENTATION

Training and awareness raising are essential to ensure all personnel, associates, service providers and contractors are aware of the principles underpinning the safeguarding measures the business has put in place, and procedures for reporting incidents and concerns. Child safeguarding training should be provided to all personnel, without exception, including staff who have no direct engagement with children in their daily work. The primary objective of the training is to ensure that all staff members are aware of the business's dedication to upholding children's rights and maintaining a zero-tolerance stance toward child abuse.

Child safeguarding training can be incorporated into a broader session on safeguarding and protection from sexual exploitation and abuse (SEAH) and/or GBV (gender-based violence). Individuals engaged in high-risk projects or high-risk activities due to their direct contact with children may require a dedicated session on child safeguarding or more advanced training to address specific needs and challenges effectively. Similarly, more in-depth training should be provided to those who have a specific remit in relation to child safeguarding, such as those responsible for actioning reports of incidents and concerns. Following the initial training, annual refresher

⁹⁹ Adapted from UNICEF (2014). Engaging Stakeholders on Children's Rights. A tool for companies, p.7.

¹⁰⁰ CPC Learning Network (2023). Adapting ESF SE/SH risk management to the needs of diverse children. Six Actions to Keep Children Safe from Sexual Exploitation and Abuse, p. 2.

¹⁰¹ Within a business setting recruitment relates to staff, but there may be other unpaid roles for which people are recruited such as volunteers. If the role involves contact with children, irrespective of whether it is paid or unpaid, parttime or fulltime, then safe recruitment processes should always be followed.

¹⁰² Erooga, M. (2009). Towards safer organisations: adults who pose a risk to children in the workplace and implications for recruitment and selection.

sessions should be implemented, with attendance mandatory for all staff members.

There are numerous child rights organizations at the global and national level who can assist in the development and delivery of appropriate child safeguarding training. Training should cover areas such as definitions and principles of child safeguarding, legal context, acceptable behavior, roles and responsibilities within the team, guidance on how to recognize signs and symptoms of child abuse, how to report cases as well as how to handle disclosures.¹⁰³

Additionally, awareness raising activities should be undertaken at the community level. Businesses should publicize their commitment to child safeguarding and share relevant policies and procedures so that communities (including children) are aware of acceptable behavior, ways to report concerns and incidents of child abuse, and what happens when an incident is reported.

All communication materials should be tailored for different audiences and made available in formats and languages that are easily accessible and understandable by all, including children.

CONTRACTORS AND THIRD-PARTY WORKERS

Contractors and third-party workers should also be aware of the child safeguarding policy and procedures and the expectations the business has of them. This can be accomplished through appropriate contractual obligations and a Code of Conduct that includes child safeguarding clauses. A dedicated version of the Code of Conduct for contractors and suppliers can be developed based on the staff Code of Conduct. Training for contractors and third-party workers engaged in high-risk projects is recommended.

Businesses should communicate their commitment to child safeguarding along with relevant policies including a Code of Conduct at the earliest stage. This information should be incorporated into the procurement procedures to ensure clarity for all applicants regarding the expectations placed on them in this area.

As soon as procurement procedures begin, due diligence should be carried out on all contractors and third-party workers to consider risks and potential impact on children and existing child safeguarding measures. The child safeguarding risk assessment should be embedded into organization-wide assessments.

During the contractual phase, a formal agreement should be established, with the contractor committing to adhere to the relevant child safeguarding policies and procedures. If the contractor lacks their own child safeguarding measures, an agreement outlining how they will be supported to achieve a satisfactory level of compliance and competence around child safeguarding should be included in the contract, or they should agree to adopt the child safeguarding measures of the business. Contracts should include a clause on reporting and responding to child safeguarding concerns, ensuring a transparent and accessible grievance mechanism is available and widely publicized. The contract should specify who is responsible for investigations, and the implications if concerns are confirmed.

It is not recommended that agreements be summarily terminated if a safeguarding concern has arisen; it is however crucial that a clear process of response be in place and followed, and information shared. The threat of withdrawal of funding when a case of child abuse is reported can lead to negative outcomes, with businesses hiding or not addressing grievances properly for fear of financial implications. Termination is an option that should be triggered by the partner's attitude towards the concern or failure to take necessary remedial action.¹⁰⁴

¹⁰³ Adapted from CPC Learning Network (2023), Adapting ESF SE/SH risk management to the needs of diverse children. Six Actions to Keep Children Safe from Sexual Exploitation and Abuse, p. 3. https://cdn.prod.website-files.com/6536395eddeda04982e8229f/6536395eddeda04982e82746_Six-Actions-to-Keep-Children-Safe-from-SEA.pdf

¹⁰⁴ Adapted from Keeping Children Safe (KCS). <u>The International Child Safeguarding Standards</u>, p.19..

SUPPLY CHAIN

For supply chains, where there is a high risk of child abuse, businesses should identify and monitor risks on a regular basis and introduce preventive measures to minimize risks of child abuse occurring. As indicated in IFC PS2, ¹⁰⁵ a business should monitor its primary supply chain on an ongoing basis to identify any significant changes; if new risks are identified, appropriate steps must be taken.

To better understand the scope of the issue, businesses should consider engaging experts to map child safeguarding risks within the supply chain.

By regularly reviewing and updating practices based on monitoring results, businesses can both evaluate the effectiveness of safeguarding measures and foster a culture of learning and improvement, ensuring the highest level of protection for children.

Step Five: Monitor, Learn from, and Improve Child Safeguarding Practice

SUPERVISION AND OVERSIGHT

It is recommended that a monitoring mechanism be established, with a set of indicators assessed on a regular basis. This should be embedded in wider organizational processes established to monitor risks.

Data collected during monitoring can then be used to improve organizational processes, identify areas for improvement and guide programmatic decisions. It can be used to show in which areas progress is being made and increase overall accountability. Businesses should consider reporting progress at regular intervals or include updates in the annual sustainability or corporate responsibility reporting cycle. 106 Additionally, data regarding any reports of safeguarding concerns or incidents should be reviewed and analyzed to feed into revision and updating of safeguarding policies and procedures.

Regular reporting to key management forums should be put in place, including at the Director level, to track progress and performance on child safeguarding. External or independent bodies, such as the Board of Trustees or oversight committees, should be used to monitor performance in this area and hold senior executives to account in relation to child safeguarding.

KEY PERFORMANCE INDICATORS (KPIs)

Key Performance Indicators (KPIs) should be set up to monitor progress in child safeguarding on an ongoing basis. A strong set of KPIs enables businesses to assess their impact and effectiveness of child safeguarding measures with data from monitoring used to inform decision-making processes (see Table 4.3 below).

KPIs should be based on the outcomes of the child safeguarding risk assessment, tailored to the pre-identified risks, sociopolitical situation, social norms, business activities impacting children, the size of the organization and the scope of its work and the wider context of operations. KPIs should also be formulated to reflect and measure actions to mitigate disadvantages that children face, such as any inability to raise concerns or access grievance mechanisms. If in doubt, businesses should consider hiring child safeguarding and protection experts to help set up KPIs and identify key areas of concern.

KPIs should be related to all areas of a business's work, including business operations, suppliers, customers' and other business partners' activities, to create a broad reporting framework.¹⁰⁷

 ¹⁰⁵ IFC (2012). <u>Performance Standard 2: Labor and Working Conditions</u>, para 27.
 106 As previous footnote.

¹⁰⁷ IFC (2012). Performance Standard 2: Labor and Working Conditions, para 36.

Table 4.3. Sample Key Performance Indicators

Area	Sample KPI
Policies and procedures	 Percentage of operations with implemented local community engagement, risk assessment and mitigation processes. What does the business say publicly about its commitment to respect children's rights? For example, number of reports, public statements and so forth per year; number of orientation or awareness-raising sessions conducted. Percentage of employees that participated in the child safeguarding training in the last 12 months.
Grievance mechanism	 Percentage of operations with child safeguarding grievances received. Is the grievance mechanism publicly available and promoted in each investment? For example, the number of cases/reports received and handled per project.
Stakeholder engagement	 Percentage of operations with stakeholders engaged specifically on child safeguarding. Percentage of stakeholders with awareness of business commitment to child safeguarding and what it means in practice.
Marketing	> Percentage of operations with processes to identify, assess and monitor specific risks and impacts on children.
Supply chain and procurement	> Percentage of supplier procurement contracts including minimum requirements in relation to child safeguarding.

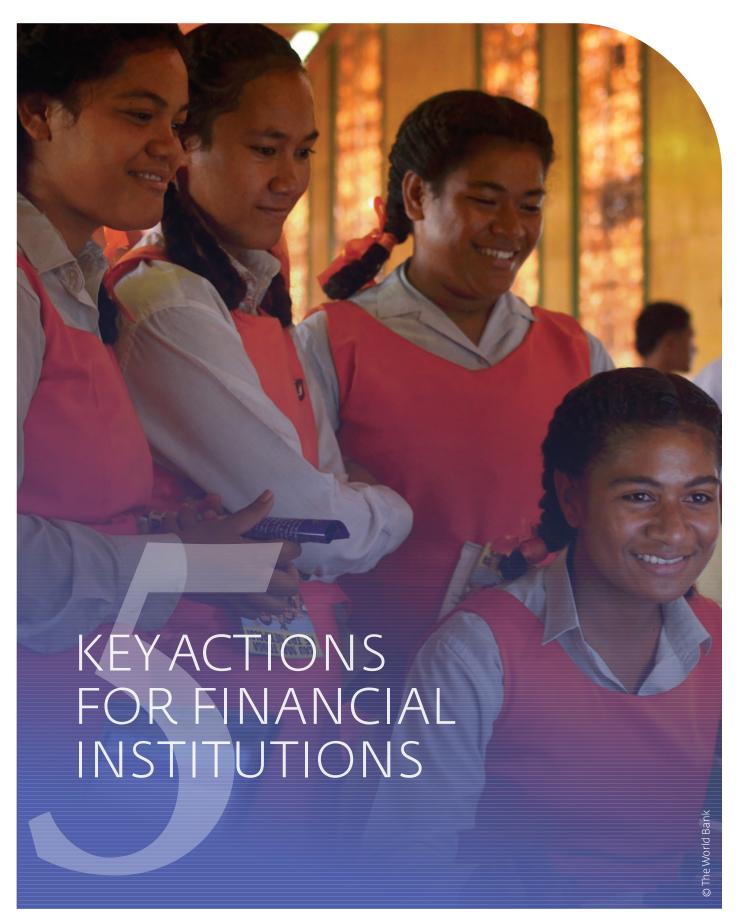
Before attempting any monitoring/data collection activities, a risk assessment should be conducted to identify potential unwanted impacts and prevent unintended harm being caused in the process, especially for in-person activities. To avoid risks, a business should carefully select individuals involved in the on-site visits and explain its commitment to child safeguarding, and the requirements of its child safeguarding policy and Code of Conduct before commencing any work.

Due to the sensitivity of work around child safeguarding, monitoring activities should be conducted in a safe and ethical way. Guiding principles include:

> **Obtaining informed consent:** Ensure that all participants understand the reason and process for data

collection and have access to a grievance mechanism. Where direct engagement with children is necessary, appropriate procedures need to be in place to ensure no harm is done in the process.

- > Importance of privacy and confidentiality: All personal data and information needs to be collected and stored safely. Establish business-wide processes of data storage and retention and implement additional safeguards for identifiable data. Use data protection processes and procedures to inform the monitoring and learning activities.
- > Cultural sensitivity and respect: Remain respectful of local social norms, customs, and traditions. Ensure that the community members understand the aim of the activity and are consulted in the process



5



KEYACTIONS FOR FINANCIAL INSTITUTIONS

Financial institutions and intermediaries may face challenges in exerting control over how their funds are utilized and the extent to which the businesses they support have implemented child safeguarding measures. It is recommended that these organizations also have their own child safeguarding policies and procedures. This is particularly important when a financial institution provides child-care services to its employees, or offers internships to minors, or when it provides financing to sectors with a marked risk of child abuse (for example, education, agribusiness, health, entertainment, hospitality, and so forth).

While the overarching guidance is like that for businesses, financial intermediaries can take specific steps to assess and supervise that the actions of the companies they finance align with their expectations regarding child safeguarding. These include:

- 1. Due diligence: It is recommended that financial intermediaries conduct focused screening and environmental and social due diligence (ESDD) assessments to gain an adequate understanding of potential child safeguarding risks associated with their investments and measures their clients have in place to mitigate these. 108 High priority areas for child safeguarding risks can be identified by assessing subsector risks and context or country of operation. This can be achieved through the development of child safeguarding-specific assessment tools for the FI's internal resources. Use of expert consultants is advisable for investments in businesses with higher risk to children (for example schools for all ages from kindergarten onward, daycare centers, certain health care facilities).
- 2. Investment agreements: For investments of higher risk in terms of child safeguarding (for example schools and others, where due diligence has identified the investment as such), child safeguarding should be built into the contract to ensure that the funding recipient aligns with the values and commitment of the Financial Intermediary and has robust child safeguarding measures in place (for example a child safeguarding policy, either standalone or included in the entity's E&S policy). Where the need for a particular investment to have child safeguarding improvements is identified, corrective actions should be incorporated in a time-bound action plan as part of the agreement.
- 3. Capacity building: In cases where there are shortcomings in the child safeguarding measures, Financial Intermediaries should require the implementation of relevant policies, training and awareness activities, and a grievance mechanism as part of a time-bound action plan. Enhanced child safeguarding mitigation measures should be focused on

¹⁰⁸ To ensure that the process is conducted to the standard expected, Financial Intermediaries should train internal resources on identifying and managing high child safeguarding risks.

the priority areas identified in the due diligence process. Financial Intermediaries may also consider entering into agreements to support the investees in enhancing their child safeguarding measures. This can be undertaken in parallel with ongoing supervision of identified gaps and progress in implementation of corrective actions.

- 4. Broker partnerships between businesses and local organizations: If the businesses funded by Financial Intermediaries have limited expertise in child safeguarding, help can be requested from relevant experts or organizations. Hiring an expert or collaborating with local organizations specializing in child protection can help facilitate the process of improving safeguarding measures.
- 5. Raise child safeguarding risks as an issue associated with existing business priorities:

Child safeguarding measures should be integrated into relevant business processes and included in the broader organizational risk assessment. Noncompliance with the commitment to child safeguarding should be seen as sufficient reason to require immediate corrective actions, potentially impacting on the agreement and leading to the use of levers.

- **6. Introduce monitoring with a focus on child safeguarding:** For entities with sizable portfolios such as banking institutions, the portfolio monitoring exercise can be done on a sample of the identified high-risk clients/exposures.
- 7. Discuss the need for action on child safeguarding with co-investors during policy dialogue and when developing country strategies: Influencing and exchange of good practice in child safeguarding can help achieve better results. Incorporating relevant measures into wider country strategies helps ensure that all adequate measures are included in any new activities. Financial intermediaries can leverage their role and engage with other investors and FIs to influence attitudes and approaches regarding safeguarding and advocate for increased action on child safeguarding.



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ANNEX A: OVERVIEW OF THE IMPACT OF CHILD ABUSE ON CHILDREN



The effects of what happened have stayed with me, undealt with and unprocessed, throughout my life. The damage from my early years has colored everything else at all stages of my life. I know it sounds dramatic but I'm just telling it like it is"

—One in Four (2015) Survivor Voices: breaking the silence on living with the impact of child sexual abuse in the family environment.

Abuse can leave children struggling with difficult emotions and memories and anxiety that will not go away. It can lead to poor self-esteem, substance abuse, depression, self-harm, and suicide.

Prolonged exposure to abuse or violent situations can lead to "toxic stress," which has detrimental effects on learning, behavior, and health throughout a person's lifetime. 109

Research has demonstrated that the impact of abuse can be seen in seven key areas, as shown in Table A.1 below:100

Table A.1. Child abuse impact

Physical health	Physical injuries, high body mass index (BMI), unexplained medical problems, problems related to childbirth
Emotional well-being	Emotional distress, trauma (especially posttraumatic stress disorder, PTSD), anxiety, depression
Externalizing behaviors	Substance misuse, risky and inappropriate sexual behaviors, offending
Interpersonal relationships	Reduced relationship satisfaction and stability, issues with intimacy and parent–child relationships
Socio-economic	Lower educational attainment, higher unemployment, financial instability, homelessness
Religious and spiritual belief	Disillusionment with religion, faith as a coping mechanism
Vulnerability to revictimization	Sexual revictimization in childhood and adulthood, and other types of victimization

¹⁰⁹ Report of the Independent Inquiry into Child Sexual Abuse (2022) for the UK Government.

¹¹⁰ As previous footnote.

These impacts commonly emerge and subsequently play out in the lives of victims and survivors in a complex, dynamic and unpredictable ways. Outcomes in each of these seven areas have been shown to interact with, cause, compound, or (in some cases) help to mitigate outcomes in other areas. Outcomes can occur, or recur, at any stage of the victim or survivor's life course."

Children are not a homogeneous group, and thus, the type and severity of the effects of abuse can vary significantly among different subgroups and among individual victims and survivors. Indeed, evidence indicates that significant long-term harm is not an inevitable outcome. Some children exhibit resilience or attain recovery, while others manage to return to 'adaptive' or 'positive' functioning following a period of adversity. However, bbecause we cannot predict which children will experience lasting harm, comprehensive recovery and support services must be available to all - while continuing to work to eliminate abuse at its roots.

 $^{^{\}hspace{-0.5em} 111}$ As previous footnote.

¹¹² As previous footnote.

ANNEX B: KEY GUIDING PRINCIPLES

These principles should underpin all child safequarding policies, procedures, and activities:

'Best interest of the child' – One of the four core principles in the United Nations Convention on the Rights of the Child, 1989, which applies universally to all actions and decisions concerning children. When adults make decisions, they should consider how these decisions affect children and do what is best for the children. It mandates active measures to uphold their rights, foster their survival, growth, and well-being, and provide support to parents and other caregivers routinely responsible for realizing children's rights. During any child safeguarding investigations, the 'best interest of the child' must be a guiding principle while taking any decisions which relate to, or will impact on, the child.¹¹³ This means promoting the development, safety, and well-being of the child at all times. The needs of children will differ, and actions must be tailored to each individual child.

Child participation – Actively involving children in decisions that affect their lives, ensuring their voices are heard and their perspectives considered. It recognizes children as rights holders with valuable insights and experiences, promoting their empowerment and autonomy. The United Nations Convention on the Rights of the Child emphasizes the importance of children's participation in matters that concern them.

While child participation is valuable, it is critical to acknowledge the potential risks of harm if participatory methods are not carefully assessed and sufficiently planned. All activities involving children should be conducted under the supervision of experts to ensure the safety and well-being of children.

Do no harm – The commitment to minimizing or avoiding harmful outcomes of actions taken by a business in the course of its work. The principle is particularly important when working with children and vulnerable communities, emphasizing the necessity for businesses to ensure that their operations do not inadvertently cause harm or worsen pre-existing vulnerabilities.

Confidentiality – The ethical and legal obligation to protect sensitive information obtained during the safeguarding processes, including disclosures of abuse or harm experienced by a child. It involves ensuring that this information is shared only with authorized individuals on a need-to-know basis, respecting the privacy and dignity of the child and their family, and maintaining strict protocols for the secure storage and handling of confidential data. Confidentiality is crucial for building trust with those involved in the care of a child who has been abused, facilitating open communication, and safeguarding the well-being of all involved parties.

Accountability – All businesses are subject to the principles of corporate accountability, which recognize responsibilities beyond profit generation such as consideration for the social, environmental, and ethical implications of their operations. Transparency regarding child safeguarding measures is essential for businesses to be accountable, as an organization's credibility relies on openness and appropriate risk mitigation and response to concerns. Businesses must take a zero-tolerance stance on inaction in response to any instance of child abuse. This means addressing all reports and taking a survivor-centered approach throughout the process.

Survivor-centered (child-centered) approach – The commitment to treat the needs and wishes of the victims and survivors of any form of harm (including, but not limited to, sexual exploitation and abuse) as the utmost priority, while providing support tailored to the needs of the individual. Overruling the survivor-centered approach should occur only in exceptional circumstances, linked solely to their well-being, and undertaken in a transparent and ethical way, with a commitment to uphold at all times the rights and dignity of the child and their best interest. A survivor-centered approach means that businesses need to incorporate adequate, professional advice in relation to child safeguarding and involve stakeholders with relevant expertise.

¹¹³ Adapted from UNICEF (2010). Children's Rights and Business Principles.

ANNEX C: GRIEVANCE MECHANISMS FOR CHILDREN AND RESPONDING TO CONCERNS

All companies need to be ready to receive and respond to child safeguarding reports. The sophistication of grievance mechanisms and response processes to ensure timely and safe handling of safeguarding concerns and child abuse incidents should reflect the level of safeguarding risk and the extent of contact and impact the business has on children.

For some companies, adapting an existing grievance mechanism may be sufficient. Similarly, such businesses may only need to know when and how to make referrals of concerns to the relevant child protection agency (depending on the national law).

This annex summarizes some of the key issues that need to be considered when developing new or adapting existing grievance mechanisms and responding to safeguarding concerns. It should not be considered detailed guidance.

Reports of safeguarding concerns and incidents can be a sign that the grievance mechanism is working, accessible to children, and concerned adults. As part of its commitment to child safeguarding, a business should take the 'no tolerance of inaction' approach. This means introducing a strict policy covering any form of inaction over reported child safeguarding cases and clear consequences for contractors and suppliers who fail to take appropriate action.

Businesses should establish a grievance mechanism to receive and facilitate resolution of Affected Communities' concerns and grievances about the client's environmental and social performance. The grievance mechanism should be scaled to the risks and adverse impacts of the project and have Affected Communities as its primary user. This is to address and resolve complaints or grievances regarding a negative impact brought about by the

project's activities and/or individuals working on the project. 115

Existing grievance mechanisms are not necessarily well suited for all cases. They are not equipped to receive and handle child safeguarding reports, especially those involving allegations of serious child abuse and will therefore need adapting. Usually within the context of child safeguarding and child protection a grievance mechanism is referred to as a 'reporting mechanism' or in some cases a 'complaints mechanism'. The nomenclature is far less important than how it actually functions.

Typically, grievance mechanisms are designed for adults, and children often lack access to them. Therefore, it is important

Mandatory reporting obligations for child abuse are legal mandates in some countries that compel specific professionals or individuals to notify authorities of suspected or known cases of child abuse. These obligations differ depending on the jurisdiction, underscoring the importance for businesses to understand the specific laws and requirements relevant to their country of operation. Non-compliance may lead to legal repercussions, including fines or, in certain instances, criminal charges.

that businesses develop or adapt mechanisms that are accessible to children (see Table C.1 below). ¹¹⁶ Child-sensitive grievance mechanisms highlight the integrity of a business's commitment to respect children's rights and can serve as a pathway to improve business operations, activities, and relationships. ¹¹⁷

¹¹⁴ IFC (2012). Performance Standard 1: Assessment and Management of Environmental and Social Risks and Impacts, para 35.

¹¹⁵ IFC, EBRD, CDC (2020). <u>Addressing Gender Based Violence and Harassment: Emerging Good Practice for the Private Sector, European Bank for Reconstruction and <u>Development</u>.</u>

Global Child Forum (2020). Implementing a children's rights perspective: a workbook for business, p. 39.

¹¹⁷ UNICEF (2018). <u>Discussion Paper: Operational-level grievance mechanisms fit for children</u>, p. 7.

Adapting or developing a grievance mechanism suitable for children necessitates careful attention to their distinct needs, vulnerabilities, and communication preferences and includes the following.¹¹⁸

Table C.1. Key Elements of an Appropriate Grievance (Reporting) Mechanism

Consultation	Involve children and communities in (re)designing and shaping the mechanism as early as possible and through existing structures for child participation, where these exist, to build greater trust and buy-in, and to ensure the mechanism is fit for purpose when it comes to children. Consultations should not include any direct questions to individuals about their specific experiences.
Identifying barriers to reporting	Consider potential obstacles that could prevent children, and especially vulnerable groups of children, from accessing grievance mechanisms, such as societal attitudes, physical or geographical constraints, communication challenges, and economic limitations, and take steps to address these barriers.
Ensuring safety and confidentiality	Ensuring a child's safety is paramount in the design and implementation of any grievance mechanism: to uphold their rights, prevent further harm, and promote their overall well-being.
Making accessible	Children should be informed about the availability of the grievance mechanism, what types of incidents to report, and how to make reports. The business should promote its grievance system using easy-to-understand language and communication channels suitable for children, such as schools, youth clubs, or with the support of children's organizations. Ways of using the grievance mechanism should be adapted to suit the needs and context.
Seeking informed consent or assent ¹¹⁹	Recognize children as active participants in decision-making processes and seek to ensure their informed consent or assent to pursue a course of action or receive services. Give them 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.
Building awareness and capacity	Ensure that personnel receiving complaints are adequately prepared and trained to safely receive complaints and interact with children.

It is recommended that businesses engage a child safeguarding or protection specialist to help during the planning/design of the grievance mechanism and to support its implementation. To identify a suitable child protection specialist for this work, the business should consult with local organizations working in the areas of child welfare and protection. If strong local expertise is not available, the business may need to engage international expertise.

¹¹⁸ Adapted from Global Child Forum (2020). <u>Children's Rights and Business Workbook</u>; UNICEF (2014). <u>National human rights institutions (NHRIs) Series: Tools to support child-friendly practices.</u> <u>Child-Friendly Complaints Mechanisms</u>; IFC (2021). <u>How to Support Your Community to Develop a Community-Based Grievance Mechanism for Sexual Exploitation and Abuse</u>.

¹¹⁹ This is recommended in order to ensure that any policies and procedures developed are based on best practices in safeguarding children, are consistent with national law and promote the best interests of children.

RESPONDING TO REPORTS

Businesses should establish transparent case handling procedures for managing reports related to child safeguarding concerns and incidents. For some companies, with a low risk of receiving reports, it can be sufficient to establish which child protection agency to contact in order to refer (route) the case to them for action. These should include a specific focal point for child safeguarding to ensure all reports are handled consistently and safely.

For companies that do have contact with children and are more likely to receive reports, a more comprehensive and systematic case-handling process will be required.

Staff without the necessary skills and experience should never be involved in responding to an allegation or incident of child abuse to avoid causing further harm and to ensure compliance with relevant laws and regulations. ¹²⁰ Connected to this, case handling should always follow the relevant law of the country where the incident or events have occurred. Procedures should also outline how reports will be acknowledged and managed, by whom, and within what timeframe. Prioritizing the safety and well-being of the child should be the primary consideration in all decision-making.

For companies that do need more comprehensive procedures to respond to cases this can be achieved by ensuring the availability of individuals with specialized knowledge in dealing with children and child abuse, retaining experts in child protection, involving children's organizations in grievance handling, and selecting social workers or NGO workers with the requisite expertise and experience to communicate sensitively with children. This expertise is essential for children who have undergone abuse and trauma, ensuring that their best interests are given precedence, and that a thorough and safe response is provided.

The risks and harm that could result from safeguarding concerns (for example, when an incident has not occurred but may happen because of poor practice or non-implementation of preventive actions) and/or child abuse incidents should be comprehensively assessed and documented, with measures put in place to reduce the likelihood of their occurrence, and their potential impact.¹²¹

Further IFC guidance on the development of grievance mechanisms:

- > How to Support Your Business to Develop a Community-Based Grievance Mechanism for Sexual Exploitation and Abuse (ifc.org)
- > Addressing Gender-Based Violence and Harassment: Emerging Good Practice for the Private Sector (ifc.org)

¹²⁰ IFC (2021). How to support your company to develop a community-based grievance mechanism for sexual exploitation and abuse.

¹²¹ UNICEF (2018). <u>Discussion Paper: Operational-level grievance mechanisms fit for children</u>.

ANNEX D: OVERVIEW OF HIGHER-RISK INDUSTRY SECTORS

Table D.1. Typical Risks by Sector

SECTOR	REASONS	EXAMPLE
Agribusiness	Due to factors such as hazardous working conditions, informal employment practices, and widespread poverty, which can expose children to exploitation, abuse, and neglect	Child labor (for example, child working in a tea plantation)
Education	Teachers and others working in schools wield authority and hold a position of trust, engaging extensively with children of all ages and across various environments, often with differing degrees of supervision.	Physical chastisement (typically a teacher hitting children as a form of discipline, also known as corporal punishment)
Health	Health care professionals occupy positions of trust and engage directly with children of all ages and frequently within confined settings such as hospital rooms.	Patient abuse (for example, a child sexually abused by a medical professional)
ICT	The pervasive influence of digital technologies, including social media platforms and online gaming environments, renders the ICT sector a high-risk environment for child safeguarding.	Grooming (for example, an adult befriends a child online and establishes an emotional connection, with the intention of sexually exploiting them).
Marketing	The marketing sector presents a high risk for child safeguarding due to its potential to expose children to inappropriate content, manipulative advertising practices, and breaches of online privacy.	Psychological abuse (for example, a child exposed to harmful adult content)
Infrastructure	The infrastructure sector presents a heightened risk for child safeguarding, given that its extensive projects are often situated in remote or marginalized communities, alongside the influx of male workers, potentially leaving children susceptible to abuse and exploitation due to insufficient safety measures and supervision.	Sexual exploitation (construction worker sexually exploits child from affected community)
Travel and tourism	The travel and tourism sector presents a high risk for child safeguarding due to factors such as transient environments, lack of oversight, and potential exposure to exploitation and abuse by tourists, business travellers and/or local individuals.	Trafficking (traffickers promise a child and their family a better job or educational opportunity to persuade the child to leave home)

ANNEX E: ETHICAL PRINCIPLES FOR CONSULTATION WITH CHILDREN

CHILD PARTICIPATION: A FUNDAMENTAL RIGHT

Under Article 12 of the United Nations Convention on the Rights of the Child (1989), all children—defined as anyone under the age of 18—have the right to participate in decisions that affect their lives. In some countries, this right is also a legal requirement. Businesses and investors have a unique opportunity to support and facilitate child participation across various processes, from stakeholder engagement to project design, risk assessments, and the development of safeguarding policies and procedures.

This guidance note outlines the principles for ethical and safe child participation, ensuring that children's voices are heard and respected in meaningful ways.

KEY PRINCIPLES FOR ETHICAL AND SAFE CHILD PARTICIPATION

Child participation is not only about what is done but also how it is done. To ensure participation is meaningful, ethical, and safe, the following principles should serve as the foundation and framework for engaging children:

1. Purposeful:

- > Participation must have a clear purpose and objectives.
- > Avoid tokenistic involvement by ensuring children's input is meaningful and contributes to decision-making processes.

2. Voluntary:

- > Children must have the choice to participate or not, with the freedom to withdraw at any time without repercussions.
- > Consent must be obtained from both children and their legal guardians or parents, with clear communication about confidentiality and how their input will be used.

3. Respectful:

- > A child's views and opinions must be taken seriously and considered in decision-making.
- > Adults may not always agree with a child's perspectives, but that input must be treated with respect, and a child should never feel belittled or dismissed.

4. Inclusive:

- > Ensure equal opportunities for all children to participate, regardless of age, origin, sex, gender identification, sexual orientation, language, belief, ability, or other status.
- > Special efforts should be made to include marginalized groups, such as girls, children who belong to sexual and/or gender minorities, refugees, and children with disabilities, with tailored support as needed.

5. Relevant:

- > Focus on issues that children are knowledgeable about and that directly affect them.
- > Preparatory work may be required to build children's confidence or raise awareness on specific topics before seeking their input.

6. Transparent and Accountable:

- > Clearly communicate the purpose of participation and how children's input will be used.
- > Provide feedback to participants, explaining how their contributions influenced decisions or policies. If feedback cannot be provided, this should be made clear from the outset.

7. Child-Friendly:

- > Consider the ages and capacities of children when organizing participation activities.
- > Use child-friendly methods, such as games, visual aids, and interactive demonstrations, and ensure the timing and location are suitable for children.
- > Facilitate participation in ways that allow for rest, fun, and comfort.

8. Safe or Do No Harm:

- > Prioritize children's physical safety and emotional security throughout participation processes.
- > Ensure facilitators have the necessary skills and experience to support children effectively.
- > Avoid asking children to share traumatic experiences, such as abuse, unless it is part of a carefully managed therapeutic process.

HOW BUSINESSES CAN SUPPORT CHILD PARTICIPATION

Businesses can integrate child participation into their operations in several ways, including:

- > **Stakeholder Engagement:** Consult children as part of broader stakeholder engagement processes to understand their perspectives on projects and initiatives.
- > **Project Design and Feedback:** Involve children in the design and review of projects, ensuring their input shapes outcomes that affect them.
- > **Risk Assessments:** Seek children's views during risk assessments to identify potential safeguarding concerns and develop effective mitigation strategies.
- > **Policy Development and review:** Engage children in the creation of safeguarding policies and procedures to ensure they reflect children's needs and priorities.

RAISING AWARENESS AND BUILDING CAPACITY

To ensure effective child participation, businesses should:

- > **Train Facilitators**: Equip staff and facilitators with the skills and knowledge needed to support ethical and safe child participation (or identify suitable external expertise to assist).
- > **Promote Awareness:** Use multiple channels, such as websites, posters, and community outreach, to inform children and their caregivers about participation opportunities.
- > **Monitor and Evaluate:** Continuously assess the effectiveness of participation processes and make improvements based on feedback from children and stakeholders.

Conclusion

Child participation is not only a legal and ethical obligation but also a powerful tool for creating inclusive and impactful business practices. By adhering to the principles of purposeful, voluntary, respectful, inclusive, relevant, transparent, child-friendly, and safe participation, businesses can ensure that children's voices are heard and valued. This proactive approach not only protects children's rights but also enhances the quality and sustainability of business operations.

ANNEX F: CODES OF CONDUCT

WHY CODES OF CONDUCT MATTER

Codes of Conduct are essential tools for establishing expected behaviors and creating a positive and safe environment for children. They go beyond a simple list of rules, serving as a shared set of agreed and acceptable behaviors that guide interactions and help maintain child safeguarding standards. Sometimes referred to as "Codes of Behavior," these documents are critical for ensuring that all individuals within a company understand their responsibilities and act in ways that protect children.

FORMAT OF CHILD SAFEGUARDING CODES OF CONDUCT

The format of a Child Safeguarding Code of Conduct depends on the company's activities and level of engagement with children:

1. Integrated Approach

- > For companies with limited contact with children, child safeguarding provisions can be incorporated into existing Codes of Conduct (for example, for Gender-Based Violence), HR policies, or contract clauses.
- > This approach ensures that safeguarding measures are embedded within broader organizational policies.

2. Dedicated Code of Conduct

- > For companies with substantial activities involving children, a separate Child Safeguarding Code of Conduct is recommended.
- > A dedicated Code of Conduct consolidates all relevant information in one place, making it easier to share with children and their parents/caregivers.
- > This is particularly important as children and parents/caregivers may not recognize unacceptable behavior unless it is explicitly outlined.

TYPES OF CODES OF CONDUCT

There are two main forms of Codes of Conduct:

1. Compliance-Based Codes of Conduct

- > Explicitly outline what behaviors are acceptable and unacceptable.
- > Useful for companies with less frequent contact with children or where nonspecialists are involved.
- > Provides clear guidance on expected behavior, reducing ambiguity.

2. Values-Based Codes of Conduct

- > Express the company's values (for example, treating people with dignity and respect) but leave interpretation to individuals.
- > More suitable for companies conducting diverse activities, employing child specialist professionals, or operating in dynamic environments where flexibility is required.

For most companies, a compliance-based Code of Conduct is appropriate as it provides clear and actionable guidance, particularly for nonspecialist staff.

DEVELOPING CHILD SAFEGUARDING CODES OF CONDUCT

When developing a Child Safeguarding Code of Conduct, the following considerations are important:

1. Contextual Relevance

- > The Code should reflect the realities of the company's operations and the local context, including the perspectives of adults and children.
- > Engaging children and their caregivers in the development process fosters buy-in and commitment to the Code.

2. Standard Provisions

- > Many provisions in the Code of Conduct are standard and can be adapted to suit the company's specific circumstances.
- > A sample compliance-based Code of Conduct can serve as a starting point, with adjustments made to reflect the nature of activities and engagement with children.

3. Clarity and Accessibility

- > The Code of Conduct should be written in clear, simple language to ensure it is easily understood by all stakeholders, including children and their caregivers.
- > It should be widely disseminated through multiple channels, such as websites, posters, leaflets, and contracts, to maximize visibility and accessibility.

RECOMMENDATIONS

To ensure the effectiveness of a Child Safeguarding Code of Conduct, companies should:

- > **Tailor the Code to Operations** Reflect the specific activities and level of engagement with children.
- > **Engage Stakeholders** Involve children, caregivers, and staff in the development process to ensure relevance and buy-in.
- > **Provide Training** Offer training and briefings to ensure all staff and third parties understand the Code and their responsibilities under it.
- > Monitor and Update Regularly review and update the Code to reflect changes in activities, risks, or legal requirements.

Conclusion

A well-developed Child Safeguarding Code of Conduct is a cornerstone of effective child protection within a company. Whether integrated into broader policies or created as a standalone document, it provides clear guidance on expected behaviors, fosters accountability, and helps create a safe environment for children. By tailoring the Code to their specific context and ensuring widespread awareness, companies can demonstrate their commitment to safeguarding children and maintaining ethical practices.

SAMPLE CODE OF CONDUCT

When working with children under 18 years old, I will:

- > Comply with the child safeguarding policy (and procedures) and put the well-being and safety of children above everything else.
- > Treat all children equally regardless of their age, race, skin color, ethnic, national, or social origin, gender, disability, language, religion, political or any other opinion, wealth, birth or any other status, sexual orientation, or any other reason, and not have favorites.
- > Ensure all activities are suitable for children's abilities and ages.
- > Always ensure that children are properly supervised.
- > Respect children's privacy, for example, not entering toilets without permission and not providing personal care that children can do for themselves.
- > Share any concerns I have about the safety and well-being of children, including about individual children, with the Child Safeguarding Focal Point or with management.

Specifically, I will NOT:

- > Humiliate or belittle children, even if it is meant as a joke.
- > Use physical chastisement or corporal punishment or use any violence against a child.
- > Spend time alone with individual children away from others and instead work in an open way where I can be seen by others.
- > Engage in or allow any verbal, physical or sexually provocative games or inappropriate touching with children.
- > Engage in any sexual relationship with anyone under 18 years of age, which includes not making sexually suggestive comments to a child.
- > Engage in inappropriate use of social media, which includes not engaging children in private social media conversations.
- > Post photographs or other information about children or their families on my personal social media (for example Facebook or websites) or the [Company] social media, without the permission of the children concerned and their parents.
- > Not to undertake my duties while under the influence of alcohol or while using nonmedically prescribed drugs.

I understand that if I do not follow the Code of Conduct, I may be subject to measures that could include suspension or termination of contract and referral to outside child protection agencies or the police. By signing the Code of Conduct, I confirm that there are no reasons for concern about my suitability to be involved with children and programs/activities (for example, no previous convictions or allegations of child abuse).

NAME:	DATE:
SIGNATURE:	
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ANNEX G: SAFER RECRUITMENT

Ensuring that the right people are hired to work in organizations, including companies and businesses, is a critical step in creating a safe environment where children are protected, can thrive, and reach their full potential. Safer recruitment practices demonstrate an organization's commitment to child safeguarding and help reduce the risk of harm to children.

WHY SAFER RECRUITMENT MATTERS

Protecting Children: Adults who intend to harm children may target organizations where they can gain access to them. Even individuals without harmful intent may still be unsuitable to work with children if they lack the necessary temperament, patience, or knowledge.

Sending a Clear Message: Implementing safer recruitment practices signals to potential applicants that the organization takes child safeguarding seriously. This can deter individuals with harmful intentions from applying.

Reducing Risk: While no recruitment process can be 100 percent "safe," safer recruitment aims to minimize the risk of hiring unsuitable individuals, especially for roles involving direct contact with children.

ADDRESSING CONCERNS ABOUT SAFER RECRUITMENT

Explaining the Process: Some individuals may feel anxious or offended by the idea of background checks or other recruitment measures. It is important to explain that these processes are standard for everyone and are not triggered by any personal perception.

Reassuring Applicants: Emphasize that these measures are part of the organization's commitment to protecting children and ensuring a safe environment. Most reasonable people will understand and appreciate the importance of these steps.

CHALLENGES IN SAFER RECRUITMENT

In some contexts, it may be difficult to fully implement all the safer recruitment practices due to local challenges, such as:

- > Difficulty obtaining references or verifying qualifications.
- > The potential for police checks or references to be forged.
- > Situations where applicants, such as refugees, may not have access to their documentation.

The key is to do what is reasonable and feasible, using a combination of strategies rather than relying on a single approach. Always ensure that recruitment practices comply with national laws, including any specific requirements for working with children.

SAFER RECRUITMENT STRATEGIES

The table below outlines practical steps to incorporate safer recruitment into your hiring practices. These strategies can be adapted to your organization's context and the local environment.

Table G.1. Structured Recruitment and Follow-up: Essentials

Job Descriptions	Clearly outline the responsibilities of the role, including any contact with children.
Application Forms	Use standardized forms to collect consistent information, including employment history.
Interviews	Include questions about the applicant's experience of working with children and their understanding of child safeguarding.
References	Request references from previous employers, particularly those where the applicant worked with children.
Background Checks	Conduct police or criminal background checks where feasible. Be aware of the potential for forged documents.
Verification of Qualifications	Verify the applicant's qualifications and training, especially if required for the role.
Code of Conduct	Ensure applicants understand and agree to the organization's code of conduct, particularly regarding behavior toward children.
Probation Periods	Implement probationary periods to assess the suitability of new hires in practice.
Ongoing Monitoring	Regularly review staff performance and behavior, particularly in roles involving children.
Legal Compliance	Ensure that recruitment practices comply with national laws and regulations. In some countries, specific requirements for working with children may be outlined in legislation, such as: Mandatory qualifications. Background checks. Limitations on the type of information that can be requested.

Key Takeaways

- > Safer recruitment is a proactive approach to protecting children and creating a safe environment.
- > It involves a combination of strategies to reduce the risk of hiring unsuitable individuals.
- > While challenges may arise, the goal is to do what is reasonable and feasible within the local context.
- > Clear communication about the process can help reassure applicants and demonstrate the organization's commitment to child safeguarding.

By implementing safer recruitment practices, organizations can build trust, protect children, and create a culture where safeguarding is a top priority.

 Table G.2. Safer Recruitment and Follow-up: Further Recommendations

Safer Recruitment Practices

RECRUITMENT AND SELECTION PROCESSES

Profile of candidate and job descriptions	Include the skills and knowledge that are needed to safely work with and for children within the profile. This will depend on the position. Clearly, a teacher is going to have much more contact with children and relies more heavily on relevant interactive skills than someone in a more administrative role.
Advertisement	Include a clear statement about the company's commitment to safeguarding children in any advertisement about the position.
Interview questions	Include at least one question that relates to child safeguarding.

ACTIONS BEFORE APPOINTMENT

Self-declaration	Applicants should complete and sign a declaration of good character, including the section confirming they are safe to work with children and giving permission for checks to be made.
Reference checks	Two professional references should be provided. Depending on the position, references must include a previous employer. References should always be sought upon and obtained directly from the referee using an email address, postal address, or phone number. Open references (for example, the candidate providing a written reference) are generally not sufficient.
Proof of identification	Verify candidate's identity (for example, using a passport or national ID card) to ensure false information has not been used to secure a position.
Qualification and registration checks	Any qualifications or professional registrations claimed in the application should be verified by asking to see original certificates.
Police record checks	Anyone deciding whether to request a police record check must consider whether the post requires access to children as well as the validity, reliability, and availability of such checks. Where a police record check is required, it should be sought from the country where the candidate is living as well as any other country where the person may have lived and/or worked. Some countries have a database of offenders or people who are not suitable to work with children. If this exists, then it should be checked.
	Having a conviction does not necessarily mean that the person cannot be appointed. It depends on the offence. Any conviction for mistreatment or abuse of a child should automatically remove that candidate from consideration.

Safer Recruitment Practices

ACTIONS AFTER APPOINTMENT

Code of conduct	All staff and others (including managers, directors, interns, and consultants) should sign a code of conduct. This should be explained to them so that they are clear about expected behaviors.
Induction	As soon as possible, after the newly hired persons begins to work for the company, a briefing or orientation should be provided on the company's child safeguarding policy. This must include providing the name and contact details of the child safeguarding focal point.
Probationary period	A probationary period can be used to actively assess suitability for the position. Terms and conditions, including the duration of the probationary period, will depend on the country's employment laws, but ideally, it should be at least three months.

ANNEX H: THE FOCAL POINT IN CHILD SAFEGUARDING

WHY A CHILD SAFEGUARDING FOCAL POINT IS ESSENTIAL

The role of a Child Safeguarding Focal Point (FP) is critical in ensuring that children of all ages and abilities are protected within a company's operations. While it may be possible to combine this role with another similar function, such as a GBV Focal Point, it is strongly recommended to have a dedicated Child Safeguarding Focal Point when there is substantial engagement or contact with children. This ensures that safeguarding measures are implemented effectively, and that children's needs remain a priority.

ROLE OF THE CHILD SAFEGUARDING FOCAL POINT

The Focal Point serves as a central contact for child safeguarding within the company, providing advice, support, and coordination for the implementation of child safeguarding policies and procedures. However, the responsibility for safeguarding children does not rest solely with the Focal Point—it requires the support of management and the cooperation of all employees and stakeholders.

While the role is important, it need not be overly burdensome. Most of the time, the Focal Point's responsibilities involve being available to assist and advise as needed. During incidents or emergencies, additional work may be required. For larger companies or those with operations across multiple sites, it is advisable to appoint multiple Focal Points, with one main Focal Point responsible for overall coordination.

Suggested Responsibilities of the Child Safeguarding Focal Point	
Leadership and Representation	 Act as the first point of contact for child safeguarding matters within the company. Represent the organization in safeguarding-related discussions and decisions.
Policy Awareness and Training	 Ensure staff, third parties, children, and parents are familiar with the child safeguarding policy and their responsibilities under it. Provide or facilitate training and briefings on safeguarding policies and procedures.
Risk Assessments	> Conduct or support risk assessments to ensure activities account for safeguarding risks, such as corporate social responsibility programs or stakeholder engagement involving children.
Partnerships and Referrals	 Establish partnerships with local authorities, civil society organizations, and experts in child protection, health, and law enforcement. Maintain referral pathways for incidents requiring external advice or intervention.
Incident Management	 Act as the first point of contact for abuse incidents and escalate concerns to management and local authorities as appropriate. Keep accurate records of incidents and actions taken.
Monitoring and Reporting	 Maintain and monitor the safeguarding implementation/action plan. Produce reports for senior management on safeguarding activities and incidents.
Training and Development	> Participate in child safeguarding training to stay updated on best practices and legal requirements.

SUGGESTED SKILLS AND CHARACTERISTICS

To effectively fulfil the role, the Child Safeguarding Focal Point should possess the following skills and attributes:

- > **Approachability** Ability to communicate effectively with adults and children.
- > **Respect and Authority** Recognized within the company as a trusted and credible figure.
- > Calm Under Pressure Ability to remain composed during sensitive or distressing situations.
- **Empathy** A child-centered approach that prioritizes the needs and interests of children.
- > **Professionalism and Confidentiality** Ability to handle emotionally sensitive issues with discretion and consistency.
- > **Organizational Skills** Ability to maintain accurate records of training, incidents, and safeguarding activities.
- > Training and Presentation Skills Capability to deliver training and raise awareness about safeguarding policies.
- > **Knowledge and Experience** Ideally, some background in child safeguarding and child protection.

INCREASING VISIBILITY OF THE FOCAL POINT

To ensure the effectiveness of the role, companies should make the name and contact details of the Focal Point widely known. This can be achieved through:

- > Internal Communication Posters in offices, leaflets, and clauses in contracts.
- > **External Communication** Company websites, community outreach, and engagement with parents.
- > Multiple Channels Use a variety of methods to maximize visibility and accessibility.

Conclusion

A dedicated Child Safeguarding Focal Point is essential for creating a safe environment for children and ensuring the effective implementation of safeguarding policies. By appointing qualified individuals, providing adequate support, and raising awareness of the role, companies can demonstrate their commitment to protecting children and fostering a culture of accountability and care.

