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Please send any comments and queries to <CSR@unicef.org>.

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### ABBREVIATIONS

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<th>Full Form</th>
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<tr>
<td>CRBP</td>
<td>Children’s Rights and Business Principles</td>
</tr>
<tr>
<td>CRC</td>
<td>Convention on the Rights of the Child</td>
</tr>
<tr>
<td>CSR</td>
<td>corporate social responsibility</td>
</tr>
<tr>
<td>DRR</td>
<td>disaster risk reduction</td>
</tr>
<tr>
<td>EMF</td>
<td>electromagnetic field</td>
</tr>
<tr>
<td>ICT</td>
<td>information and communication technology</td>
</tr>
<tr>
<td>ICNIRP</td>
<td>International Commission on Non-Ionizing Radiation Protection</td>
</tr>
<tr>
<td>ILO</td>
<td>International Labour Organization</td>
</tr>
<tr>
<td>ISP</td>
<td>Internet service provider</td>
</tr>
<tr>
<td>ITU</td>
<td>International Telecommunication Union (United Nations)</td>
</tr>
<tr>
<td>MO-CRIA</td>
<td>child rights impact self-assessment tool for mobile operators</td>
</tr>
<tr>
<td>NGO</td>
<td>non-governmental organization</td>
</tr>
<tr>
<td>UNICEF</td>
<td>United Nations Children’s Fund</td>
</tr>
</tbody>
</table>
### GLOSSARY

<table>
<thead>
<tr>
<th>Term</th>
<th>Definition</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>adolescent</strong></td>
<td>UNICEF and other United Nations agencies define ‘adolescence’ as age 10–19. For international law, anyone under 18 is considered to be a child, whereas those 18–19 years old are adults, unless the age of majority is attained earlier under national law. In the context of children’s rights, it is vital for business to consider the unique needs of adolescents, who are in a transitional phase separate from both early childhood and adulthood. As adolescent girls and boys grow, they take on additional responsibilities, experiment with new ways of doing things and push for independence – developing values and skills that have great impact on their well-being. For information and resources on adolescents and young people, see &lt;www.unicef.org/adolescence&gt;.</td>
</tr>
<tr>
<td><strong>child</strong></td>
<td>As stated in the Convention on the Rights of the Child article 1, “a child means every human being below the age of eighteen years unless, under the law applicable to the child, majority is attained earlier.”</td>
</tr>
<tr>
<td><strong>child sexual abuse material</strong></td>
<td>‘Child sexual abuse material’ refers to representation – by any means, including but not limited to photography, video, drawings, cartoons, text and live streaming – of a child engaged in real or simulated explicit sexual activities or any representation of the sexual parts of a child for primarily sexual purposes. Although there is no internationally agreed definition of ‘child abuse material’, the MO-CRIA tool and guidance use the term as defined above, based on the Optional Protocol to the Convention on the Rights of the Child on the sale of children, child prostitution and child pornography, article 2. For the purposes of this publication, the term is preferred over ‘child pornography’ because it leaves no doubt that abuse and exploitation are involved.</td>
</tr>
<tr>
<td><strong>cyberbullying</strong></td>
<td>International law does not define ‘cyberbullying’. For the purposes of this guide, it is defined as behaviour that is harmful or intended to cause harm, occurs repeatedly, and involves an imbalance of power that prevents the victim from challenging or ending the behaviour. Cyberbullying can involve direct approaches, such as chat or text messaging; semi-public tactics, such as posting a harassing message on an e-mail list; and public communication, such as creating a website devoted to making fun of the victim. Children have reported that bullying online is an important issue for them. While more bullying takes place offline than online, information and communication technologies provide new, more invasive and anonymous opportunities for children and young people to bully others.</td>
</tr>
<tr>
<td><strong>grooming</strong></td>
<td>Online grooming is the process by which an individual befriends a young person for online sexual contact, sometimes with the involvement of webcams</td>
</tr>
</tbody>
</table>
that allow ‘sharing’ of the exploitation among networks of child sex abusers, and sometimes extending to a physical meeting to commit sexual abuse. The areas of cyberspace that enable abusers to groom potential victims include chat rooms, social networking sites and instant messaging.

The term ‘grooming’ has not been defined in international law; some jurisdictions use the term ‘luring’.

**notice and takedown**

Operators and service providers are sometimes notified of suspect content online by customers, members of the public, law enforcement or hotline organizations. ‘Notice and takedown’ procedures refer to a company’s processes for the swift removal (‘takedown’) of illegal content, defined according to the jurisdiction, as soon as it has been made aware (‘notice’) of the presence of illegal content in its services.

**parental control tools**

‘Parental control tools’ are software-based programs that allow users, typically parents, to control some or all functions of a computer or other device that can connect to the Internet. These programs are usually password protected.

Some control tools can limit access to particular types or classes of websites or online services; others also provide scope for time management, i.e., the device can be set to have access to the Internet only during certain hours. More advanced versions can record all texts sent or received from a device.

Control tools need to strike a balance between the right to protection from all forms of violence and exploitation, and a user’s rights to information, freedom of expression, privacy and non-discrimination, as defined in the Convention on the Rights of the Child. It is unlikely ever to be possible to remove all the risks to children that exist in the online environment. Moreover, beyond a certain point, attempting to do so could threaten the very essence of the Internet and its multiple benefits.
INTRODUCTION

Mobile operators affect children through the ways they operate their facilities and develop, market and deliver products and services. They can respect and support children’s rights through the economic and social development that results from their operations, and through relationships with business partners and key stakeholders.

UNICEF works with businesses to embed children’s rights across their activities, operations and relationships, and is taking an industry approach to engaging with companies. Collaborative initiatives in priority sectors – including the mobile operator industry – are an important strategy to develop good practices and set precedents.

To support mobile operators in evaluating their child rights impacts, Millicom and UNICEF, with support from Den Norske Veritas, teamed up in 2014 to develop the ‘MO-CRIA’ self-assessment tool. MO-CRIA is designed to strengthen corporate practices, policies and processes, with the goal of making it possible for children worldwide to safely explore and enjoy the best of what the information and communication technology industry has to offer.

This guide outlines the background, purposes and functions of MO-CRIA, and offers detailed instructions and advice for using the tool.
The Children’s Rights and Business Principles

Under the United Nations Guiding Principles on Business and Human Rights, all businesses have a responsibility to identify, prevent, mitigate and, where appropriate, remediate their potential or actual negative impacts on human rights.¹ The Guiding Principles represent a milestone in setting the standards for companies conducting human rights due diligence, including impact assessments. But despite momentum in corporate consideration of human rights, the business focus is just recently beginning to include children as distinct rights holders and stakeholders.

Companies interact with children on a daily basis as workers, consumers and community members. Recognizing the need for explicit guidance about what it means for business to respect and support children’s rights in the workplace, marketplace and community, the United Nations Global Compact, Save the Children and UNICEF released the Children’s Rights and Business Principles (CRBP) in March 2012.

Developed in consultation with children, companies, investors, trade unions, national human rights institutions, civil society, governments, academics, United Nations entities, child rights experts and business experts, the CRBP offer 10 concrete actions that can be taken by all companies:

1. Meet their responsibility to respect children’s rights and commit to supporting the human rights of children.
2. Contribute to the elimination of child labour, including in all business activities and business relationships.
3. Provide decent work for young workers, parents and caregivers.
4. Ensure the protection and safety of children in all business activities and facilities.
5. Ensure that products and services are safe, and seek to support children’s rights through them.
6. Use marketing and advertising that respect and support children’s rights.
7. Respect and support children’s rights in relation to the environment and to land acquisition and use.
8. Respect and support children’s rights in security arrangements.
10. Reinforce community and government efforts to protect and fulfil children’s rights.

The CRBP call on companies to respect children’s rights, avoid any infringement on the rights of children, and address any adverse child rights impact with which the business is involved. They also encourage companies to support children’s rights by taking voluntary actions that seek to advance children’s rights through core business operations, products and services, strategic social investments, advocacy, public policy engagement, and working in partnership and other collective action.

For the full CRBP document, additional resources, news and events, visit the UNICEF, Global Compact and Save the Children website, <http://childrenandbusiness.org>.

MO-CRIA objectives and development process

The MO-CRIA tool is primarily designed to:

• Enable mobile operators to more fully understand the challenges, opportunities and child rights impacts related to their industry and their operations, and how to mitigate potential negative impacts.

• Offer an easy-to-use and comprehensive self-assessment framework for companies to analyse and manage their potential and actual impacts on child rights.

• Uncover strengths and weaknesses in managing child rights within the company’s human rights framework, and build plans and training programmes to enhance child rights management within the organization.

Development of this child rights impact self-assessment tool and guidance began in 2012, when Millicom, a UNICEF partner organisation, commissioned DNV Two Tomorrows to develop a risk assessment tool based on the Children’s Rights and Business Principles for their mobile operations. This was initially tested in the Democratic Republic of the Congo in 2013 and subsequently has been used elsewhere in Africa and Latin America, enabling UNICEF to further improve and develop for broader application. Starting in 2015, UNICEF engaged many different stakeholders on the tool-in-progress, including the GSMA Mobile Alliance leading non-governmental organizations (NGOs) specializing in child rights for the ICT sector, and independent human rights consultants working in the ICT sector.

The content was separated into Excel and a Word based guidance document. After establishing the basic structure around six business functions, draft questions and indicators were added, then assessed for their relevance to mobile operators. Guidance was expanded in this Word based document. The aim was to keep MO-CRIA broad and simple – with a focus on the core workplace, marketplace and community issues in the industry – but at the same time be specific enough to drill into the detail where needed.
Preparing for assessment: Research and value chain mapping

Desktop research to scan the key resources and essential documents is a great first step. At the company level, internal reports on sector-wide issues, international operations and country-level analysis – along with previously commissioned studies on legal issues and regulatory risks – will offer a wealth of detail that can be applied to assessing children’s rights impacts.

The essential external resources begin with the Convention on the Rights of the Child (CRC), available in Arabic, English, French, Russian and Spanish at <www.unicef.org/crc/index_30160.html>. This is the gold standard for answering the question: What are child rights? The CRC is a binding international treaty, which means that all governments that ratified it (nearly every country in the world) are legally committed to upholding children’s rights. It covers social and economic rights such as food, water, housing, health care, education and a pollution-free environment, as well as civil and political rights – participation, religious freedom and juvenile justice. All of these rights apply to all children everywhere, no matter who they are or what their family is like and regardless of their sex, race, abilities, religion, language, political opinions or wealth.

Additionally, UNICEF offers multiple resources for business at <www.unicef.org/csr>, as well as two crucial publications for understanding the CRBP:


When developing child rights risk indicators, resources include:


- International Labour Organisation (ILO) conventions, particularly Convention No. 138, on the minimum age for admission to employment and work, and No. 182, on the worst forms of child labour. All ILO conventions can be downloaded from <www.ilo.org/dyn/normlex/en/f?p=1000:12000:0::NO:::>


- The Family Online Safety Institute’s Global Resource and Information Directory (GRID) is designed as a factual and up-to-date source for governments, industry, lawyers, academics, educators and others who are working to make the Internet safer for children. The portal at <www.fosigrid.org> collects information from trusted sources, with expert oversight, and provides interactive maps and quarterly reports on ‘digital inclusion’ and other ICT industry topics.

Mapping the company’s value chain is tremendously helpful in preparing for the assessment, and in reviewing the results to see whether actual and potential, direct and indirect impacts and risks have been adequately covered. Before delving into the assessment questions, mapping the perceived risks across the value chain can provide focus for the next steps. When the MO-CRIA results are available, the map can help mobile operators integrate the findings into existing risk-management processes.
The figure below illustrates a sample value chain for mobile operators:

- **Mobile Operators**
- **Manufacturing**
- **Materials and components**
- **Mobile Networks**
- **Other Networks** e.g. Wifi
- **Devices & operating systems**
- **Product & service development**
- **Sales channels/ Retailers/ Sales Agents**
- **Device partners, product and service development teams**
- **Content**
- **Internet**
- **Mobile Services**
- **Apps**
- **Device partners, marketing and retail**
- **Supply chain partners**
- **Devices and platforms that enable mobile devices to operate**
- **Primary materials to components, integration and product supply**
- **Sales terms, contracted agents, marketers, rural partners**
- **ISPs, operations, services and inhouse app owners, external service and app providers**

**Users**
- Users, parents, or carers, service communities

**Device, product & service development**

**Sales, marketing and retail**

**Device partners, network partners and other providers**

**Provides access to services and apps**

**Content development that users access on mobile devices**

**App developers, website owners/developers, product and service development team**

**Users, service use**

**Users, service use**

**Users, service use**

**Users, service use**

**Users, service use**

**Users, service use**

**Users, service use**

**Users, service use**
Working with stakeholders

Engaging with both internal and external stakeholders – before, during and after the assessment – will be a vital part of preparing for the evaluation, making sure the company’s answers to the self-assessment questions are accurate and comprehensive, and following up the results with refreshed or new policies, procedures and activities. This will also help make sure that the assessment is well-informed, free of bias and apropos to the company’s specific operating environment.

Before starting on the MO-CRIA questions, map the management and staff who need to be part of the assessment. Identify their locations (headquarters, regional or national) in line with the six assessment areas: (1) Corporate Social Responsibility/Sustainability and Compliance; (2) Human Resources; (3) Products, Sales and Marketing; (4) Procurement; (5) Network Operations; and (6) Security. Orientation discussions with internal stakeholders can be held to orient them to the assessment and explain the relevance of their specific function in this assessment.

While using the six primary areas as a foundation for the assessment, there may be some areas that will need the involvement of managers and staff from other operational/technical departments – particularly in large, multinational corporations. In order to complete the most accurate and comprehensive assessment possible, MO-CRIA users are encouraged to call on their internal expertise across all business units and throughout the value chain.

Many mobile operators have diverse locations for producing, marketing and selling their products and services. So it is important that sufficient regional and in-country stakeholders are included to represent high-value and high-risk areas, as well as the diversity of your company’s operations – above and beyond the people who will be gathering evidence, filling out the MO-CRIA worksheets, and putting the results into action.

Consider conducting interviews, by phone or in person, with external stakeholders who can provide expertise on child rights for your industry and/or company.

Questions may include:

- What are the primary child rights impacts in your industry?
- What are the current strengths and weaknesses in managing child rights (for your company and industry or sector)?
- What key issues are not adequately being addressed/pose the biggest risk to children, as well as companies/organizations?
- Are there new, or emerging, issues that are currently unmanaged or difficult to manage?
- Are there region specific issues / trends you feel are important to highlight (for your industry/sector)?

Experts who understand the risks, issues and potential solutions related to child rights in the locations where the company operates can be found among international organizations, NGOs or charity project partners; suppliers, industry associations and trade unions; and recruitment agencies or providers for outsourcing services.
How to use the MO-CRIA tool

The MO-CRIA tool is an Excel-based questionnaire that is designed to make it easy to answer questions, and store the results and related evidence generated during the self-assessment. The PDF-format guide for using this child rights impact self-assessment tool for mobile operators is set up to be used as a companion to the worksheets. Both the tool and the guide are available at the UNICEF website, <http://www.unicef.org/csr/toolsforcompanies.htm>. The MO-CRIA Excel file features six primary self-assessment areas:

1. Corporate Social Responsibility/Sustainability and Compliance
2. Human Resources
3. Products, Sales and Marketing
4. Procurement
5. Network Operations
6. Security & Emergencies

Each of these areas is related to the department responsible for the key organizational functions of a mobile network operator in the areas that are most likely to influence the company’s management of and impact on children’s rights. As appropriate for your business scope and context, MO-CRIA can be used at multiple levels, from headquarters to country offices, as well as for subsidiaries.

Format and structure: Six functional level worksheets, nine columns, and clearly marked assessment areas for each topic – that is the essence of MO-CRIA. The figure below shows an Excel-page snapshot, highlighting basic instructions:

1. Assess baseline performance
2. Identify opportunities to go beyond baseline criteria
3 & 4. Record status and evidence
4. (optional) Allocate a risk level and priority to each self-assessment area

Tool highlights areas where attention is needed
**Assessment area** appears in column 1. Broad groups of related questions are noted with a light-orange heading, followed by the specific questions to be answered.

**Baseline expectation** appears in column 2. This refers to the minimum standard required to ensure that the topic is addressed.

**Yes, No, N/A** appears in column 3. Does your company meet the baseline expectation? Assess and answer by clicking on the bottom-right corner of the cell to reveal the drop-down menu. If the baseline criteria are only partially met, consider the company’s operating context: Is enough being done to effectively manage this area? Choose ‘Yes’ or ‘No’, accordingly. If the question does not apply to your company, choose ‘N/A’ (use the ‘Notes on status’ column to record why the item is not related to the company’s operations).

**Further action** appears in column 4. This refers to activities that go beyond the baseline expectation. For each question or statement, assess the company against the baseline and/or good practice: Does it meet these requirements?

**Yes, No, N/A** appears again in column 5. Assess and answer by clicking on the bottom-right corner of the cell to reveal the drop-down menu.

**Please note: The tool includes automatic formatting to help easily call out where attention is needed. This includes:**

- If you select "No" for the Baseline criteria, the row will be highlighted in red
- If you select "Yes" for the Baseline criteria and "No" for the Further Action criteria, the row will be highlighted in orange
- If you select "N/A" for both Baseline and Further Action criteria, the text will be crossed out and cell highlighted in grey
- If you select "Yes" for both Baseline and Further Action criteria, the row will remain in its current format

<table>
<thead>
<tr>
<th>Assessment area</th>
<th>Baseline expectation</th>
<th>Yes, No, N/A</th>
<th>Further action</th>
<th>Yes, No, N/A</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.1 Policies and impact assessment frameworks</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>1.1.1 Business principles, codes of conduct and policies</td>
<td>Children’s rights considerations are integrated into the company’s business principles, codes of conduct and other policies where relevant, and are applied locally.</td>
<td>No</td>
<td>The codes and policies make specific reference to the recognized international standards (Children’s Rights and Business Principles, Convention on the Rights of the Child) and this is further detailed and explained in context of the specific rights in question.</td>
<td>Yes</td>
</tr>
<tr>
<td>1.1.2 Public commitment to children’s rights</td>
<td>The company has made a commitment to children’s rights that is publicly available on its external website and communicated internally to all staff.</td>
<td>No</td>
<td></td>
<td>Yes</td>
</tr>
<tr>
<td>1.1.3 Integrating children’s rights into risk and impact assessments</td>
<td>The company has completed a human rights or social impact and risk assessment at the corporate/global level that includes considerations related to children’s rights.</td>
<td>Yes</td>
<td>The company has completed impact and risk assessments related to the specific context in all countries of operation.</td>
<td>Yes</td>
</tr>
<tr>
<td>1.1.4 Considering the impact of products and services on children’s rights</td>
<td>The company assesses children’s rights impacts, opportunities and risks that may be associated with its product and service innovation, research, development and distribution.</td>
<td>Yes</td>
<td>Appropriate procedures are in place to ensure that all products and services are considered from a child rights perspective before approval for release and distribution.</td>
<td>Yes</td>
</tr>
</tbody>
</table>
**Notes on status** appears in column 6. Use the cells in this column to record what the company is currently doing in each area, for example, developing Code of Conduct including child rights/aligned to child rights principles (CRBP), conducted global risk assessment including issues related to child rights (regional risk assessments under development).

**Evidence presented** appears in column 7. Record the names of the documents and records used as evidence for your assessment here. Keep copies of these documents and records in a secure, easy to access, corporate archive (e.g. corporate intranet or shared central server). It is recommended that file names align to tool naming/numbering so current and future users can easily locate documentation (e.g. 1.1.1_Baseline_Code of Conduct.pdf or 1.1.1_Further Action_Code of Conduct.pdf). If documentation is accessible via the company website or intranet, simply include the link in the tool.

Completing these seven columns fulfils the core functions of the assessment. **The next two items are optional**, though highly desirable in many cases. Conducting a risk analysis as part of MO-CRIA will help identify priorities, as well as provide an opportunity to integrate the assessment findings within existing human rights risk assessment and management. If you choose not to assess the risk and priority levels, hide these columns in the tool.

**Risk** *(High, Medium, Low)* appears in column 8. Assigning a risk considers the likelihood and potential severity of the effects on children, including the scale, or numbers of children who are likely to be affected, and the scope, or importance of the potential effects, for example, impeding access to education, exposure to harmful chemicals/toxins, lack of access to medical care, exposure to sexual/physical violence, possible injury/death or separation from their families.

In many cases, companies do not have as deep of insights into risks to children, and therefore it is recommended that companies partner or work with stakeholders who are experts in child rights for their industry or sector (e.g. NGOs, academia).

**Priority** *(High, Medium, Low)* appears in column 9. Use this column to assign a priority level to each assessment area that will, in turn, drive actions after MO-CRIA is completed. To prioritize actions, first consider the risk assessment outputs – the highest risks should have higher priority for action. Next, consider the company’s progress in this area: Have the criteria been fully addressed, partially addressed, or not addressed at all? Also consider the department/company capacities for taking action to mitigate the risk, and whether control or influence over the assessment area is within the given responsibilities of the business.
**Visual outputs and Data outputs:** When the worksheets are filled out, MO-CRIA automatically generates charts that summarize the results, documenting the company’s strengths and weaknesses in regard to protecting children’s rights, as well as actions that can be taken to improve alignment with guidelines and best practices.

Click on the 'Visual output' tab to view charts on progress across key functions, and progress in addressing baseline expectation and criteria for further action.

Use the ‘Data output’ tab to view the numbers (raw data) behind each chart in the visual outputs tab.

**Summary of findings (baseline and further action), by number and percentage**

<table>
<thead>
<tr>
<th></th>
<th>Number</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>Baseline</td>
<td>38</td>
<td>19</td>
</tr>
<tr>
<td>Further action</td>
<td>27</td>
<td>29</td>
</tr>
<tr>
<td></td>
<td>67%</td>
<td>33%</td>
</tr>
<tr>
<td>Further action</td>
<td>48%</td>
<td>52%</td>
</tr>
</tbody>
</table>
MO-CRIA GUIDANCE TABLES

The MO-CRIA tool features worksheets on six primary self-assessment areas – Corporate Social Responsibility/Sustainability and Compliance, Human Resources, Products, Sales and Marketing, Procurement, Network Operations and Security. These guidance tables provide support on how to interpret the questions in every area, as well as on how to improve performance against and/or address the issues. Each of the following tables outlines the:

- Department responsible for the self-assessment area
- Assessment area details
- Baseline expectations
- Guidance for achieving the baseline
- Further action
- Guidance for going beyond the baseline

We encourage users to reference these guidance tables prior to and throughout completion of the MO-CRIA tool to ensure accurate completion and results. As needed, users may also find the guidance tables helpful in providing context and guidance to stakeholders involved who may not specialize in such topics.

### 1. Corporate Social Responsibility/Sustainability and Compliance

#### 1.1 Policies and impact assessment frameworks

<table>
<thead>
<tr>
<th>1.1.1 Business principles, codes of conduct and policies</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Baseline expectation:</strong> Children’s rights considerations are integrated into the company’s business principles, codes of conduct and other policies where relevant, and are applied locally.</td>
</tr>
<tr>
<td><strong>Guidance:</strong> Your company’s general commitment to respecting and supporting children’s rights is the first step in achieving baseline expectations. The next steps for integrating children’s rights into the CSR framework include taking action to:</td>
</tr>
<tr>
<td>• Obtain senior-level commitment, and allocate resources and responsibilities for conducting a child rights impact assessment to the appropriate functions within the business.</td>
</tr>
<tr>
<td>• Map current policies and codes of conduct – including any that are related to human rights, ethics, health and safety, privacy, marketing, procurement and suppliers – to identify the children’s rights issues that are already covered, areas that could be stronger, and where there are gaps that need to be filled.</td>
</tr>
<tr>
<td>• Involve internal and external stakeholders, such as senior directors (e.g. legal/compliance, human resources, marketing, supply chain, etc.) and external experts in child rights (e.g. NGOs, government, academia) in the process to integrate children’s rights considerations into the corporate policies and codes of conduct.</td>
</tr>
<tr>
<td>• Support effective implementation of the child rights codes and policies by embedding them within the company’s procedures and culture. This could be carried out by providing training on children’s rights, offering leadership incentives, and setting up accountability mechanisms within the company and across its relationships throughout the value chain.</td>
</tr>
<tr>
<td><strong>Further action:</strong> The codes and policies make specific reference to the recognized international standards (Children’s Rights and Business Principles, Convention on the Rights of the Child) and this is further detailed and explained in context of the specific rights in question.</td>
</tr>
</tbody>
</table>
Guidance: After reviewing all relevant policies to make sure that they fully reflect its commitments to children as stakeholders and rights holders, mobile operators can:

- Use the CRBP to focus on particular issues, e.g., combating child labour; providing decent work for young workers, parents and caregivers; ensuring safety in all business activities, facilities, products and services; and using marketing and advertising that respect and support children’s rights.
- Work with suppliers, customers and business partners to identify their potential risks to children’s rights that might differ from the company’s direct operations.
- Based on mapping results, prioritize the issues that have the greatest areas of risk and opportunity for impacting children’s rights across the value chain.
- Obtain senior-level commitment, assign senior management responsibility, and allocate resources and responsibilities for addressing child rights issues identified in the mapping to the appropriate functions within the business.

1.1.2 Public commitment to children’s rights

Baseline expectation: The company has made a commitment to children’s rights that is publicly available on its external website and communicated internally to all staff.

Guidance: Ensure commitment to children's rights is easily accessible on the company's global website and any regional / brand specific websites as relevant. Ensure commitment is easily accessible to all staff, in all regions via the company’s intranet (or equivalent). Develop and implement communications plan to ensure all internal staff understand content and implications of the commitment, and where to access the commitment both internally and externally.

Further action: –

Guidance: –

1.1.3 Integrating children’s rights into risk and impact assessments

Baseline expectation: The company has completed a human rights or social impact and risk assessment at the corporate/global level that includes considerations related to children’s rights.

Guidance: For many companies around the world, implementing the Guiding Principles on Business and Human Rights includes regular mapping of actual and potential human rights impacts. Mobile operators can be integrate children’s rights into this ongoing process by reviewing their human rights mapping in light of specific and in-depth concerns related to children – including risks and opportunities in business lines, sites, facilities, products and services.

Further action: The company has completed impact and risk assessments related to the specific context in all countries of operation.

Guidance: Whether the company is entering a new market or already operating in a priority or high-risk market, it is widely recognized that risk analysis and mapping, human rights impact assessments, and consultations with internal and external stakeholders can be vital tools for evaluating and understanding the country context, local site situation, user communities, and the legal and human rights context where products/services are used.

1.1.4 Considering the impact of products and services on children’s rights
**Baseline expectation:** The company assesses children’s rights impacts, opportunities and risks that may be associated with its product and service innovation, research, development and distribution.

**Guidance:** In particular, this evaluation can focus on two areas:
- Identifying how mobile products and services could be misused to harm children and ways to block abusive usage.
- Exploring how mobile operators can leverage their core competencies to develop products and services that are essential to children's survival and development, promote healthy lifestyles for children, and support broader access to products and services among those who are marginalized.

**Further action:** Appropriate procedures are in place to ensure that all products and services are considered from a child rights perspective before approval for release and distribution.

**Guidance:** Formally integrate the assessment of child rights impacts, opportunities and risk into the company’s innovation and product/service development process (e.g. provide guidance on types of impacts, where in the development process the assessment should occur, responsible parties, etc.). As part of this, require that prior to release and distribution, this assessment be reviewed by a senior level employee who can verify that child rights impacts, opportunities and risks were accurately assessed.

### 1.1.5 Stakeholder engagement in impact and risk assessments

**Baseline expectation:** The company recognizes children as stakeholders and involves children or their representatives in stakeholder and community consultations on issues with potential impact on children.

**Guidance:** Children have information, experience and opinions that can help a mobile operator understand its potential or actual impacts on their rights. While many companies are familiar with finding out what children’s opinions are during product and marketing development, consultations with children in a human rights context require additional preparation, following particular methods and standards.

It is important to start by determining whether direct consultation with children is necessary, and to make sure that any consultations with children are conducted with expert assistance. During stakeholder consultation on issues that affect children, or while planning for business initiatives such as community investments that will have impacts on children, it might be sufficient to consult with their representatives such as parents, caregivers, local organizations, and the country or regional offices of international agencies.


**Further action:** Country or site-level assessments routinely include stakeholder consultations related to children’s rights.
**Guidance:** Engagement is often beneficial and/or necessary at the country or site-level for a variety of reasons including identifying local risks/opportunities, understanding the level of severity/opportunities of a specific child rights issue, assessing the impacts/benefits of community investments and/or development projects located in a specific country/region. A country or site-level impact assessment will engage country specific/local NGOs, local government, and local community leaders, to identify child rights risks and opportunities, and to understand how the company can respect and support child rights in collaboration with business partners and government.

1.1.6 Taking action after completing risk and impact assessments

**Baseline expectation:** Human resources and budgets are allocated to ensure that policies and actions in response to child rights risk and impact assessments are coordinated and implemented effectively across the company. This is endorsed and sponsored by senior management.

**Guidance:** The role of accountability for children’s rights is held most effectively by senior managers or executives who can allocate a budget for the material resources and staff development needed to put policy into action.

**Further action:** Based on assessment results, the company has nominated individuals at various levels of the organization to incorporate child rights-related actions across relevant internal departments, functions and processes, and across all locations where the company operates.

**Guidance:** Incorporating children’s rights in policies and procedures, creating a culture of respect for children’s rights, and recognizing these rights as a core value of the business are primary goals to be followed with steps to:

- Assign a focal point to champion children’s rights within the business, and establish cross-function groups to implement related activities.
- Amend job descriptions to include responsibility for specific child rights issues.
- Provide training, empowerment and incentives for staff to deliver on the company’s child rights objectives.
- Ensure the sensitivity of grievance mechanisms for child rights issues.

1.1.7 Monitoring and reporting

**Baseline expectation:** Measures to assess and report on progress include key performance indicators related to children’s rights. The company includes a performance review in its internal reporting processes, and reports publicly on the successes and failures against its action plan.

**Guidance:** Use consistent and continuous monitoring to collect data on any incidents or allegations involving child rights violations and issues, both for cases in which the company was deemed to be responsible and when no responsibility was identified. Consult outside resources when setting child rights objectives and performance indicators for the company; indicators on child labour risks, for example, are outlined at the Global Reporting Initiative (GRI) website, <www.globalreporting.org>.

Be prepared to provide accessible external reports on what your company is doing to address its potential and actual impacts on children’s rights. Include enough information to enable other parties to evaluate the company’s response, as frequently as needed to reflect the impact’s significance.

Take care to protect children’s identity, privacy and safety throughout reporting and tracking procedures. While reporting needs to be transparent, it should not pose risks to stakeholders, staff or the legitimate business obligations to confidentiality.
### 1.2 Grievance mechanisms and remediation

#### 1.2.1 Grievance mechanisms (reporting violations)

**Baseline expectation:** Customers and other stakeholders are provided with easily accessible grievance channels, such as toll-free hotlines or websites, to report alleged ethical violations, including violations of child rights by the company or through its products and services. The channels for reporting violations of their rights can be easily accessed and understood by children across all countries where the business operates.

**Guidance:** Support and promote channels for reporting violations such as child sexual abuse material, child labour, product health/safety impacts with appropriate toll-free numbers or online platforms, anonymous hotlines, and ‘whistle-blower’ protection for employees. Identify focal points for establishing and testing the corporate channels for discovering potential infringements of ethics and rights. Effectiveness can be measured by recording the number of reports submitted through each channel, incidents that were investigated, reports found to be valid and the follow-up results.

**Further action:** Staff or external parties involved in the remedy procedures have participated in training provided by the company on how to handle grievance reports from children – including specific guidance on ethics, processes, how to engage with children of different ages, and how to take children’s specific needs into consideration during any investigation of a grievance.

**Guidance:** When children and young people report allegations of rights violations, be sure they are assisted by a person who is trained to speak with them. Children’s safety, identity and privacy must be protected throughout the process to ensure that they do not experience reprisals from the alleged offender or others.

#### 1.2.2 Remediation (corrective action)

**Baseline expectation:** To address potential or actual violations of children’s rights, the company has established remediation mechanisms that include specific steps to be taken if such violations are identified in its operations.

**Guidance:** According to Principle 31 in the Guiding Principles on Business and Human Rights, ‘Effectiveness criteria for non-judicial grievance mechanisms’, the mechanisms should be legitimate, accessible, predictable, equitable, transparent and rights-compatible – as well as “a source of continuous learning: drawing on relevant measures to identify lessons for improving the mechanism and preventing future grievances and harms.”

**Further action:** The company has taken steps to understand and address any obstacles children may face in accessing remedial processes and actions. It has also established, and is implementing, a plan to reduce and remove these obstacles in all countries of operation.
**Guidance:** Grievance mechanisms for child rights issues need to be accessible to children and their families. Ensure that advocacy groups can access the mechanisms on behalf of children and young people. In addition, children should not be refused access or turned away in favour of a grievance filed by their parents. Also consider how formal and informal grievance mechanisms, such as an NGO-sponsored hotline (formal) or informal mediation process, can reinforce each other by the latter providing insights on issues that have the potential to escalate a larger violation.

### 1.2.3 Cooperation with enforcement agencies

**Baseline expectation:** The company’s remediation procedures include a commitment to cooperate with legitimate external processes, including judicial mechanisms that provide remedies for adverse impacts that may result from the company’s operations.

**Guidance:** While recognizing that law and enforcement vary across jurisdictions, mobile operators should make a public commit to responding effectively when children’s rights violations are identified – following national and international law, and working with national and local enforcement agencies. Building relationships with the relevant government agencies/departments can help the company build trust, develop joint solutions and establish mutually agreed reporting processes to ensure the most effective response.

**Note on cooperation with law enforcement:** In jurisdictions that lack adequate legal frameworks and/or governance over the protection of child rights, companies should leverage the resources of peers and local/international NGOs with the aim of achieving the same results – building trust, developing joint solutions and establishing reporting processes that result in the most effective response. Companies should aim first to engage with local agencies/NGOs and where not available, turn to international organizations.

**Further action:** –

**Guidance:** –

### 1.3 Stakeholder engagement and partnerships

#### 1.3.1 Community and government engagement on issues concerning children

**Baseline expectation:** In all countries where it operates, the company engages in partnerships with national authorities and/or other stakeholders such as child helplines to address key child rights issues, such as child labour, and advocates for appropriate law enforcement and stronger policies where needed.

**Guidance:** Partnership objectives and activities should be closely linked to core business activities and address challenges related to business operations and their impact on children.

**Further action:** As part of efforts to combat child labour and violence against children, the company takes an active role in eliminating poverty in the communities where it is operating and is engaged in multi-stakeholder initiatives to address the root causes of child exploitation.
Guidance: Eliminating child labour is a shared responsibility, and efforts to address the root causes are unlikely to be effective without a multi-stakeholder approach. Working in cooperation with suppliers, other companies, mobile operator associations and employers’ organizations can help develop an industry-wide approach to address child labour and create a common culture for change.

In addition to ensuring that the company’s supply chain is based on payment of living wages to those who work in it, support social protection programmes that assist families in generating income.

1.3.2 Transparency and communication

**Baseline expectation:** As part of its annual sustainability reporting, the company communicates key results and findings of child rights-related risk and impact assessments, as well as actions taken in response to the assessments.

**Guidance:** Transparency is key to working in partnership to tackle and reduce negative child rights impacts and to promote positive impacts. Additionally, reporting and disclosure on children’s rights-related issues (beyond child labour) is significantly underdeveloped.

Guidance on incorporating child rights actions and results into annual sustainability reporting is available through UNICEF’s Children’s Rights in Sustainability Reporting (Second edition with a foreword by GRI), September 2014, <http://www.unicef.org/csr/reporting.htm>. The tool aims to show companies how their reporting processes can and should be aligned with internationally recognized reporting frameworks such as the Global Reporting Initiative (GRI) and the United Nations Global Compact’s ‘Communication on Progress’ public disclosure commitment, as well as providing guidance on child rights-specific reporting beyond these frameworks.

**Further action:** The company publicizes detailed information about child rights-related initiatives at the local, national and international levels in the public domain, including information about child rights violations and remedies.

**Guidance:** –

1.3.3 Social investment and community programmes

**Baseline expectation:** The company engages in partnerships with national authorities and/or other stakeholders to positively address human and child rights issues that may be related to its product and service delivery – including such issues as access to information, freedom of expression, privacy and online safety. Children and other vulnerable groups are addressed as a priority in community involvement and investment efforts.

**Guidance:** Use findings from human rights or other risk and impact assessments to determine the company’s involvement with markets, resources and partners that can have the biggest positive impact on children in the community, in line with the core business activities and strategies. At the same time, be alert to the unintended consequences for children of well-meaning community development projects that are not aligned with the best interests of the child.

Careful planning can help mobile operators bring about sustainable gains both for business and children in a number of ways. When weighing costs and benefits, plan for long-term outcomes as well as sustainable investments that will last beyond the company’s presence. Consider, for example, how community investments can be turned into long-term, productive community assets by securing or providing a long-term funding source, engaging and garnering buy-in from influential community stakeholders, or building the local skills and capacity needed to support the investment long-term,
Further action: The company’s approach to strategic social investment programmes aligns with government plans and priorities regarding children’s rights. The company has also established programmes or initiatives to broaden access to information and communication technology for disadvantaged, under-reached or marginalized populations.

Guidance: Mobile operators’ social investments for children can range from stand-alone initiatives to contributions and cooperation with government and civil society programmes that are already in place. In both scenarios, companies should seek strategic investments based on the priorities for each business operations context, as identified by children and child rights experts, including health, education, recreation, child protection and raising awareness of children’s rights.

1.4 Disaster relief

1.4.1 Disaster relief efforts

Baseline expectation: The company has a defined approach to natural or human-caused disasters in the countries where it operates – including contingency plans and post-disaster coordination with local authorities and humanitarian agencies – with a focus on the most vulnerable groups, including children.

Guidance: Engage in durable partnerships with respected providers of humanitarian assistance. Emergencies are extremely difficult environments in which to operate and navigate. While the company might wish to make in-kind donations or volunteer staff time, financial contributions to respected, experienced aid providers will generally be far more effective.

Companies in certain sectors – such as information technology, logistics, telecommunications and transport – can make direct contributions of service to relief operations, particularly if structured and integrated into broader international efforts. However, the company should avoid making in-kind donations that involve disproportionate transport or operational costs, or that lock aid providers into inappropriate or expensive commitments they would otherwise not have undertaken.

Further action: In countries that are prone to disaster, the company’s relief support plans and processes as related to technology and connectivity services encompass government and community consultations, including with children, to ensure appropriate disaster preparedness and response.

Guidance: In many parts of the world, natural hazards such as drought, storms and floods are a regular part of life. But hazards become disasters only when a community’s capacities to cope within existing resources are overwhelmed – potentially leading to loss of life, health, livelihoods, assets and services. A vital part of emergency preparedness and response, therefore, is disaster risk reduction (DRR).

In the context of disaster assistance, mobile operators can support sustainable community development through DRR that emphasizes community dialogue, including the involvement of children.

Young people are often active and constructive participants in creating solutions, and a company should call on their insights and skills when working to support both preparedness and disaster relief. Avoid thinking of children solely as victims, a source of problems, or simply as a disaster-affected group – their ability to play a constructive role in community preparedness, recovery and dialogue is frequently underestimated.

1.5 Children and the Internet

1.5.1 Policies and processes to combat child sexual abuse content
**Baseline expectation:** The company has a policy, standard, code of conduct or other document that addresses child sexual abuse materials – and this is communicated to users, and applies in all of the company’s local operations. All customers are informed of this policy in the company’s terms and conditions.

**Guidance:** At minimum, the policy should cover a commitment to meet international and regional standards to:

- Integrate child rights considerations into all appropriate corporate policies and management processes, and develop standard procedures to handle child sexual abuse material.
- Create a safer and age-appropriate online environment, and educate children, parents and teachers about children's safety and their responsible use of information and communication technologies
- Use general terms of service to inform customers about what constitutes illegal material, notify them that such material may be reported to the authorities and removed – and that by breaching the law, customers may be prosecuted. This information should also be clearly available on the company’s website.

To access case studies for mobile operators on developing standard processes to handle child sexual abuse material, see ITU, <www.itu.int/en/cop/case-studies/Pages/sector1.aspx>.

**Further action:** The company’s policy, standard and/or code regarding child sexual abuse material is extended to all business partners, including suppliers.

**Guidance:** The policy, standard and/or code should be clearly communicated and reviewed with all business partners, including suppliers. It should be easily accessible and any updates/revisions should be communicated in a timely fashion.

### 1.5.2 Alignment with international laws and standards

**Baseline expectation:** The company’s measures to restrict access to child sexual abuse content are consistent with local laws and international standards, and these restrictions are strictly limited to child sexual abuse content.

**Guidance:** Assign focal points to receive any requests from the authorities to restrict content access, and carry out a legal review of all requests. Procedures should be in place to reject requests that do not follow the rule of law. In most cases, the company would not know the reason for these requests, but they may relate to child sexual abuse materials.

**Further action:** Processes are in place to evaluate any internal or external request to restrict telecommunication services, take down content or support law-enforcement investigations.

**Guidance:** Develop or enhance procedures to check the legality of all requests for content takedown. In case of child sexual abuse material, be ready to support potential criminal investigations and safeguard content during those investigations, and to display ‘notice and takedown’ messages if users try to access the removed content.

### 1.5.3 Advice and reporting mechanisms

**Baseline expectation:** The company works with relevant partners to promote and provide free access to helplines for children who are survivors of abuse, and hotlines to report child sexual abuse content.
**Guidance:** In all countries of operation, reporting mechanisms that are easy to find and use should be set up and based on user demographics, such as the local languages. As an alternative or in addition to corporate reporting mechanisms, mobile operators can refer customers and business partners through the value chain to national and international hotlines, which often provide an effective reporting mechanism. One example is Child Helpline International, <www.childhelplineinternational.org>.

Companies should seek to promote the national helpline in the countries where it operates, or support the establishment of a helpline in countries that do not already have one.

**Further action:**

**Guidance:**

1.5.4 ‘Notice and takedown’ procedures and enforcement

**Baseline expectation:** The company has policies and procedures in place to notify the party in violation and take down child sexual abuse content. These procedures include a commitment to support appropriate law enforcement in related investigations.

**Guidance:** Consider setting up an easy, one-click button that takes users to the abuse reporting mechanism. This should be done in the context of the company's products/services so it is easy to access and use. Ensure there is an effective filter to sift reports according to whether they are related to content that is: potentially malicious but not illegal, potentially illegal, or most likely not illegal. All content reports need to pass swiftly through to the appropriate enforcement agency or hotline for review. Any decision on illegality should be made by a competent legal authority and be free of political, commercial or other unwarranted influences.


**Further action:**

**Guidance:**

1.5.5 Information on safe Internet use

**Baseline expectation:** The company has developed or makes available activities and educational materials to promote a safe online environment for children, parents, teachers and guardians. It cooperates with relevant authorities and other stakeholders to provide a safe online environment for children and other vulnerable groups.

**Guidance:** Mobile operators can inform customers—including children, adolescents, parents and teachers—about risks online, how to protect privacy, and other aspects of safe Internet use through their websites, product marketing materials and/or broader communications/advocacy campaigns. Activities may include developing fun/engaging educational videos, safety messaging at product launches/key product events, age-appropriate product development, and more.

Additional goals for supporting a safe online environment include:

- Working with government to provide intelligence on emerging risks, trends in violations and tackling key sources of online perpetrators.
- Reviewing corporate and other ‘block’ lists for abusive or exploitative online content to make sure these lists are based on standards established by respected and externally monitored entities, such as law enforcement agencies, the INTERPOL international police organization (<www.interpol.int>) or the United Kingdom-based hotline, Internet Watch Foundation (<www.iwf.org.uk>).
**Further action:** The company leads or participates in digital literacy programmes targeted to reach children on such topics as: how to protect themselves online from predators and from disclosing personal information; protecting their privacy and online reputation; and the consequences of harmful online behaviour such as cyberbullying or sexting. These programmes are aligned to the national school curriculum in each country of operation.

**Guidance:** ‘Digital literacy’ can be defined as a threefold capacity involving technical, media and social skills – related to the ability to use technology, evaluate the quality of online sources, and understand the social norms that apply to the digital world.

Mobile operators are investing in education and communication initiatives to support their customers in making informed decisions about the content and services they use, and to empower parents and teachers to guide children towards safe, responsible and appropriate use of mobile products. This may include:

- Signposting age-sensitive content.
- Providing clear and easy-to-access information for consumers on content pricing and subscription terms.
- Offering clear and flexible privacy controls

For more information on the ways that digital literacy can help keep children and young people safe by empowering them to become ‘cyber savvy’, see ‘Children’s Rights in the Digital Age’, produced by the Young and Well Cooperative Research Centre and UNICEF, available at <www.unicef.org/publications/index_76268.html>.

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### 1.5.6 Measures to protect children from inappropriate content

**Baseline expectation:** Content filtering solutions and/or parental control tools are offered free of charge for the company's mobile and fixed Internet services.

**Guidance:** Build simple and intuitive tools/toggles for parental control options into product services and game platforms aimed for children under age 13. This will help encourage parents to be more involved in their children’s online usage and minimize the risk of ‘option fatigue’ when there are too many or too complicated choices for settings.

**Further action:** The company proactively assesses its products and services to identify, filter and block any content that is not appropriate for minors.

**Guidance:** On a regular basis, actively assess commercial content hosted on the company’s servers, both branded and contracted from third-party content providers. Where possible, create proactive technical measures to block known illegal content, including in private groups, and to analyse the objects and metadata linked to a profile to detect criminal behaviour or patterns – and take the appropriate action.

Many options, such as photo hashing technology, are available for filtering and blocking illegal content. Currently, however, these can sometimes be costly to implement and maintain. Working in partnership with others seeking similar solutions is likely to lead to a more effective approach, often at the ISP level.

When limiting content access in order to protect children, also take care that children and young people are not inappropriately restricted from accessing legitimate and helpful information such as educational material or health and wellness resources.

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### 1.5.7 Age verification

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### Baseline expectation:
The company has age-verification systems in place for any content or applications that are not appropriate for minors.

### Guidance:
Enforcing minimum age requirements, and supporting the research and development of new age-verification systems such as biometrics, using known international standards for the development of such tools.

Take steps to identify and remove underage users who have misrepresented their age to gain access. If they are not already in place, set up appropriate sign-on processes to determine whether users are old enough to access the content or service, and use nationally established age-verification systems linked to a reporting function or a help desk/centre that can help encouraging users to report people who have falsified their ages.

### Further action:

#### Guidance:

1. Implement a tax policy that outlines how it meets national legislation and international principles, including its commitment to pay all taxes, fees and royalties to national, regional and local governments in countries of operation.

### Baseline expectation:
The company has a policy, code of conduct, standard or other document that addresses corruption and bribery, and is applied in all of the company's local markets.

### Guidance:
The benefits that mobile operators' economic activities bring to a local community, as well as a country, also deliver wider benefits of supporting children's rights and increasing the social (e.g. education, healthcare, housing) and economic (e.g. income and job opportunities for their families) benefits available to children.

As a baseline, every company should provide a public statement on how it upholds national law and international principles on corporate tax obligations — including a commitment to pay all appropriate taxes, fees and royalties to local governments in its countries of operation. Both internally and throughout the value chain, establish a zero-tolerance policy on any and all forms of bribery, corruption, extortion and embezzlement, and outline the terms of enforcement.

### Further action:
The company implements a tax policy that outlines how it meets national legislation and international principles, including its commitment to pay all taxes, fees and royalties to national, regional and local governments in countries of operation.

### Guidance:

Paying taxes, royalties, duties and other fees should be viewed as a vital way to support governments in their ability to deliver basic services to children, not as a cost to be avoided. Publicly announcing the amount of taxes paid helps companies hold government agencies accountable for their obligations to children.


### 1.6 Information and communication technology (ICT) for development
**Baseline expectation:** The company works proactively to support the development of ICT infrastructure and services that benefit children.

**Guidance:** In alignment with national development plans, mobile operators can help bridge the ‘digital divide’, with a focus on children. This includes providing access for schools in remote areas, product donations to and development of products for impoverished communities (e.g. low-cost plans/devices), digital literacy programmes targeting marginalized children, and long-term infrastructure developments to increase access to mobile technology.

**Further action:** –

**Guidance:** –
## 2. Human Resources

### 2.1 Employment-related policies

#### 2.1.1 Minimum age

**Baseline expectation:** *The company has a policy clearly stating the minimum age for employment – and this minimum age is in line with or older than national law or international standards, whichever is higher. The company communicates its minimum age policy, details of the controls for implementation and reporting mechanisms to all relevant stakeholders, especially those in charge of recruitment, such as HR teams, recruitment agencies and managers, and other appropriate employees.*

**Guidance:** Develop a policy with explicit reference to ILO Convention No. 138 on the minimum age for employment and work, and ILO Convention No. 182 on the prohibition and immediate action for the elimination of the worst forms of child labour.

Make sure the policy clearly states the minimum age for employment in line with national law or international standards, whichever is higher. Include the definition of ‘child labour’ – for example, that the minimum age for any employee is 15 or the minimum school leaving age, whichever is oldest, unless a minimum age of 14 has been agreed through consultation with the country’s government and employers’ and workers’ organizations.

The minimum age policy should be publicly available and communicated to all relevant internal and external stakeholders, including all suppliers and subcontractors, and embedded within standard operating procedures and key performance indicators of human resources. This policy should be available in multiple languages and understandable for low-skilled workers. Efforts should also be made to ensure the policy is understood by illiterate workers.

**Further action:** *The company maintains up-to-date records of all employees who are under 18 years old and their allocated tasks.*

**Guidance:** Maintain a record of all employees under age 18 and the tasks they are assigned as employees. This will help identify young workers entitled to children’s rights and can also reduce the practice of employing children below the legal working age. The record should include proof of age (see guidance on how to establish an age verification mechanism in section 3.1.2 Content classification and age verification).

#### 2.1.2 Minimum age policy violation remedies

**Baseline expectation:** *The company has clear policies and processes in place for managing remediation in cases where children below the minimum age are found to be working, in every country where the company operates.*

**Guidance:** Continuously monitor and analyse information on children employed in violation of minimum age requirements; the company can do this alone or in partnership with other actors. This information will provide knowledge on the situation, trends and impact of company actions to address minimum age violations.

**Further action:** *The company has established a procedure to identify high-risk countries, regions or activities related to the minimum age policy – both within the company’s operations and among its business partners – and has a process in place to mitigate risks accordingly.*
**Guidance**: Understand the specific situation in the area, country or region where the business is operating. Pay close attention to ‘red flags’, including:
- High risk or incidence of child labour in the area, country or region, and high levels of internal or international labour migration.
- The age of school completion is not the same as the legal working age.
- Access to education is limited and education quality is poor, accompanied by low levels of school enrolment and completion.
- Poverty and high prevalence of informal economies.
- Weak legal systems, and lack of government policies/effective institutions.

### 2.1.3 Collective bargaining

**Baseline expectation**: Collective bargaining agreements with local trade unions have been signed by the company, and these agreements cover young workers’ right to collective bargaining. The collective bargaining agreements signed by the company have measures in place to protect young workers from discrimination, violence and abuse. If children under age 18 are allowed to be union members or participate in a union, these workers are assigned a union representative to ensure that their rights are fulfilled.

**Guidance**: Ensure that young workers understand their labour rights, and that these rights are respected in the workplace. Young workers are entitled to enjoy their rights on equal terms with adult employees, including:
- Contracts, fair salaries, occupational safety and health, benefits and equal pay for work of equal value.
- Representation during contract negotiations.
- Membership in trade unions of their own choosing.

**Further action**: The collective bargaining agreements or a company policy specify zero tolerance of harassment and exploitation of young workers – and implementation of this policy is monitored regularly and communicated to all staff.

**Guidance**: Integrate a zero-tolerance clause regarding harassment and exploitation of young workers into all relevant agreements, including with regard to any business facilities, property, resources and communications networks. Pay particular attention in situations/countries where those under age 18 cannot be included in collective bargaining agreements.

### 2.1.4 Use of company facilities, property, expense accounts and communication networks

**Baseline expectation**: A policy is in place to prohibit the use of any company facilities, property, expense accounts and communication networks for child exploitation and physical, sexual or verbal abuse. This policy specifies child safeguarding accountabilities for all employees who come into direct contact with children as part of their work activities. The policy is communicated to all employees, with a focus on those who have direct contact with children and is communicated externally, as relevant. In addition, a formal mechanism has been set up for receiving, processing, investigating and responding to complaints about violence, exploitation and abuse of children in the context of business activities, including use of company information technology equipment to access child sexual abuse content.
**Guidance:** Define and communicate the company’s expectations for employees, suppliers and other business partners prohibiting any type of violence, exploitation or abuse of children, including but not limited to sexual exploitation, and outline the corrective action procedures for any violation of the policy.

Be vigilant about enforcing prohibitions against misusing company property or information and communication technology for sexually exploitative conduct. Most companies have implemented measures such as Internet blockers to prohibit use of company devices and systems for downloading child abuse images, facilitation of commercial sex or access to chat rooms by children.

Company policies should prohibit the use of expense accounts for any activities related to the sexual abuse or exploitation of children. This includes prohibiting employees from using expense accounts, per diem allowances or credit cards to cover the sexual exploitation of children or to access child sexual abuse materials.

**Further action:** Guidelines for implementing the policy in various areas of the company are developed and supported by training, with all staff signing off as recipients of these policies.

**Guidance:** Review and map all situations where staff may have direct contact with children. Clearly outline procedures for all activities or contact with children and young people. Specify that children are always appropriately supervised, are consulted and shown respect, and are treated fairly and without discrimination.

Ensure that a grievance mechanism is in place and is accessible to children and those who can report child rights violations on their behalf, such as community members, local NGOs and government officials. If a child reports an allegation to a company staff member, the child should be shown that she or he is taken seriously. Responses to children must be confidential, safe and timely. Children should be interviewed by professionally trained staff, and any investigation should be conducted by a relevant authority outside the company.

Also inform employees, customers, suppliers, service providers and other stakeholders about the available channels to report incidents of potential abuse. Phone hotlines and online channels for reporting child abuse incidences can be effective.

### 2.2 Young workers’ rights and managing risks

#### 2.2.1 Worst forms of child labour

**Baseline expectation:** The company has identified whether the worst forms of child labour – including but not limited to hazardous work, trafficking, sexual exploitation, debt bondage and forced labour – are relevant to its operations. Work that is ‘hazardous’ – harmful to health, safety or morals – for workers under age 18 is prohibited in accordance with national law or the relevant International Labour Organization (ILO) standard, whichever is stricter. Where risks are identified, all workers are made aware of the risks and control mechanisms, such as regular audits.
**Guidance:** The worst forms of child labour include hazardous work, trafficking, sexual exploitation, debt bondage and forced labour. For mobile operators, this could include working at heights or with electricity (technical maintenance) or being exposed to harmful chemicals/toxins.

Establish procedures and practices to prevent, identify and investigate alleged abuse, intimidation, harassment, trafficking, sexual exploitation and labour exploitation of a child. If child rights violations are discovered, arrange immediate assistance for the child and referral to the appropriate local child protection authority. If a government authority is not available, refer to a local child rights NGO.

Clearly identify work that is prohibited for workers under 18 years old. Maintain a record of all employees under age 18 and provide ongoing supervision. Periodically review and report on whether young workers are effectively prohibited from carrying out hazardous tasks; that their welfare, health and safety are safeguarded, in particular their exposure to stress and strain; and that their workload is adjusted accordingly.

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**Further action:** The company has taken steps to understand the prevalence and risks of the worst forms of child labour in all countries of operation. In high-risk countries or regions, the company engages with communities and government to address root causes of child labour.

**Guidance:** Each country has to define what it considers ‘hazardous’ work in line with ILO Conventions 138 and 182. However, many have standards that are lower than international norms or even non-existent. In such cases, a company should employ the higher international standards and create internal guidelines to protect young workers.

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### 2.2.2 Reporting and remediating worst forms of child labour

**Baseline expectation:** Clear policies and procedures are in place for reporting, addressing and remediating any cases of the worst forms of child labour in the company’s direct or indirect operations. These policies and procedures are publicly available and communicated internally and externally. Include staff signoff of receipt and knowledge of policies.

**Guidance:** Aim to remove children from child labour – and immediately from hazardous situations – while providing alternatives that prevent them from being pushed into more dangerous survival alternatives, such as sexual exploitation or trafficking. Before an underage worker is dismissed from employment, make sure a remediation programme is available, such as:

- Assistance with access to education, transitional schooling or vocational training.
- Replacing a child labourer with an adult family member to compensate for the family’s loss of income.

Keep in mind that each incident requires an approach tailored to the child’s age, working conditions, home situation and education level, and the availability of schooling. Companies can cooperate with parents or caregivers, schools, government agencies, and local NGOs and international child rights organizations to find the best solution.

**Further action:** –

**Guidance:** –

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### 2.2.3 Minimum and living wage

**Baseline expectation:** The company pays its employees and ensures contractors are paid minimum wages as defined by local legislation. It also ensures that overtime regulations concerning are respected in accordance with local law or ILO standards, whichever is stricter.
### Guidance:

**Further action:** The company has taken steps to understand what constitutes an adequate living wage in the country/countries of operation — and a ‘living wage’ is defined as a remuneration that is high enough for a worker to meet her or his basic needs. This policy is implemented to cover both employees and subcontractors.

**Guidance:** Identify and consider what steps can be taken to provide a living wage — enabling families to survive without recourse to child labour — for each country where the business operates. Be aware that the legal minimum wage in many countries is lower than the living wage.


### 2.3 Training and development opportunities for young people

#### 2.3.1 Supervision and training

**Baseline expectation:** A mechanism is in place for supervision of young workers, with clear instructions on how to perform tasks safely and effectively and adequate training to ensure young workers understand the requirements of their role in the company. This information should be made visible in common areas.

**Guidance:** Consider recruiting workers above the minimum age for employment, particularly in areas with high levels of youth unemployment. This type of policy can help address disempowerment and lack of opportunities among idle youth.

Provide supervision of young workers to ensure that they are not required to handle tasks that are beyond their physical and psychological capacities.

**Further action:** Training is provided for young workers on their rights as outlined in the applicable ILO ‘Decent Work’ regulations.

**Guidance:** Young workers should receive training on their rights, provide in formats that are easy to understand and using their local language. Evaluate the effectiveness of their participation in such training.

Complementary provisions include making all employment policies, health, safety and pay-related information, in particular pay stubs, available in an accessible format and language.

#### 2.3.2 Opportunities for young people

**Baseline expectation:** For companies that employ young people, ensure flexible hours for them to pursue development opportunities both at and outside the workplace.

**Guidance:** Remove obstacles and make concrete efforts to encourage and assist young workers to combine work and education.
**Further action:** The company provides opportunities for apprenticeships and vocational training to young people who are older than the mandatory schooling age, e.g., 14–15 years old, but still minors (under age 18, or the national age of majority).

**Guidance:** The company can align its vocational training programmes with government-led national development plans, in particular to use mobile technology for development and to bridge the digital/communications divide. Equipping young workers with relevant skills will contribute to economic development.

### 2.4 Family-friendly policies and benefits

#### 2.4.1 Family-related policies

**Baseline expectation:** Policies are established for maternity, paternity and adoption leave, breastfeeding protection, flexible schedules or part-time work for working parents, in alignment with local law as a minimum standard in each location of operation, and at a higher standard when possible.

**Guidance:** Develop policies that outline employees' rights to decent working conditions, including but not limited to statutory sick pay, overtime pay, social contributions, living wages, parental leave, flexible working practices, family health policies, special arrangements for migrant workers and childcare arrangements.

Ensure that payment of statutory sick pay, overtime pay and social contributions are covered by the policy.

**Further action:** In addition to basic family leave policies, the company has taken steps to map or survey employee needs and implement family-friendly measures at the national level beyond those defined in local law – including flexible working hours and family-friendly leave arrangements or part-time work for working parents.

**Guidance:** –

#### 2.4.2 Maternal health

**Baseline expectation:** Employee policies outline protective measures for maternal health in the workplace so that pregnant women are not exposed to potential health hazards, for example, heavy physical work in a warehouse, hazardous work in technical maintenance, or night-time work in a call centre.

**Guidance:** Create internal guidelines to protect pregnant women in the workplace. Ensure training, protective equipment and regular health checks for all employees who handle chemicals or other materials potentially hazardous to their reproductive health.

Pregnant workers should be removed from any work environment that may threaten their health and relocated to a safer work environment through the duration of the pregnancy and after childbirth while breastfeeding. These changes should not impact the worker’s wages negatively. Comply with all applicable rules and regulations, especially for chemicals and other dangerous substances, including instructions about what to do in case of an accident. All safety warnings must be made available and posted in languages and pictures understood by the employees.

**Further action:** Company policies take the particular needs of pregnant employees into account, for example, exempting them from long-term or arduous business travel.
Guidance: Comply with the provisions of ILO Convention No. 183 on maternity protection, including the international minimum of 14 weeks paid maternity leave, with a compulsory 6-week period after birth, and consider providing the recommended 18 weeks.

Prevent discrimination against pregnant women and mothers. Ban any pregnancy testing or demands for sterilization certificates of women of childbearing age applying for a job. Prohibit the firing of pregnant women and mothers based on their status, including during maternity leave.

Consider providing paternity leave to support fathers in caring for their infants and new mothers with the many physical and emotional demands related to childbirth and parenthood.

2.4.3 New mothers

Baseline expectation: The company offers breastfeeding mothers who return to work appropriate facilities to breastfeed their babies, or to express breast milk and store it safely.

Guidance: When workers are breastfeeding an infant, they should be removed from any work environment that may threaten their health and relocated to a safer work environment. There may be legal requirements to give breastfeeding mothers reduced working hours for a defined period of time (six months to two years), or to provide them with facilities in the workplace where they can breastfeed or express milk and store it safely during working hours. These changes should not impact the worker's wages negatively.

Further action: –

Guidance: –

2.4.4 Benefits

Baseline expectation: Employee policies stipulate payment of statutory sick pay, overtime pay and social contributions to all of its employees, including young workers and student workers. When granting benefits to employees with dependent children, the company does so without discrimination on grounds of the child’s legal status as a dependant.

Guidance: Take into account the needs of workers who have family responsibilities, including the care and support of children in the home or children left behind by migrant workers. This could include offering family housing in which workers could maintain their family units, or permitting time for family reunification or family visits on company premises.

Benefits that are available to nuclear, biological families should be extended to single-parent families and workers with different family compositions, regardless of the marital status or sexual orientation of parents or children’s legal status as dependants (adopted, fostered, stepchild or offspring from a previous relationship).

Further action: Employee policies stipulate other provisions for parents and caregivers, such as supporting children with disabilities, permission to work from home, transportation services to and from facilities, and special leave arrangements for migrant workers.

Guidance: –

2.4.5 Health care

Baseline expectation: The company offers health-care advice and supports access to or provision of health-care services.

Guidance: –
| Further action: – |
| Guidance: – |

### 2.4.6 Childcare

**Baseline expectation:** Provisions for childcare exist and are supported by the company. In locations where childcare services are expensive or of poor quality, the company either provides access to childcare facilities or caregivers, or supports employees in paying school fees.

**Guidance:** Provide appropriate childcare facilities for working parents as an investment in the workforce. Workers are better able to concentrate knowing their children are safe, and workplace childcare can encourage skilled female workers to remain with the company.

If the company establishes workplace childcare facilities, be attuned to emerging standards and guidance on quality. Some companies have adopted innovative solutions for on-site childcare, such as the provision of mobile crèches at construction sites.

Alternatives to on-site facilities include subsidies for childcare fees and referral services to help workers find a suitable childcare centre.

| Further action: – |
| Guidance: – |
### 3. Products, Sales and Marketing

#### 3.1 Products and services (development, and making them available to customers)

<table>
<thead>
<tr>
<th>3.1.1 Product and services development and promotion</th>
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<tbody>
<tr>
<td><strong>Baseline expectation:</strong> In all countries where the company operates, policies and procedures are in place to assess, review and monitor products, applications, games, content and services provided and promoted to customers to ensure they are appropriate and safeguard children’s mental, moral and physical health.</td>
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<tr>
<td><strong>Guidance:</strong> Develop relevant policies and standards with reference to national laws and applicable standards. Many countries have specific, often mandatory, standards for a wide range of goods and services for children – including toys, nursery furniture, children’s clothes, playground equipment and safety equipment such as helmets. These standards address acceptable levels of harmful substances, safety and security concerns. For companies that conduct research and testing involving children, policies should mandate compliance with international and national ethical and scientific guidelines. Identify and reduce potential health dangers from both intended and unintended use of products or services. Products designed for children should meet particularly high quality and safety requirements. Safety concerns must also be addressed for products or services that are not designed for children’s use but nonetheless present hazards to children. Once products and services are available on the market, end-user monitoring can track any safety risks or harms to children.</td>
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<tr>
<td><strong>Further action:</strong> The company supports children’s rights, for example, through research, innovation, and product or service development that aims to provide affordable access to information and communication technologies among marginalized groups, such as the poorest individuals and people with disabilities.</td>
</tr>
<tr>
<td><strong>Guidance:</strong> Companies can use innovation to seek avenues for positively impacting children’s well-being and development, aligned with core competencies in products, services and distribution channels. Examples include:</td>
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<tr>
<td>• Developing products and services that are essential to children’s survival and development.</td>
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<tr>
<td>• Supporting equal access to products and services.</td>
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<tr>
<td>• Promoting healthy lifestyles for children.</td>
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<tr>
<td>The company should promote services and access that is affordable for lower income groups, and have ways to promote accessibility to technology for groups including the elderly and people with disabilities.</td>
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</table>

#### 3.1.2 Content classification and age verification

| **Baseline expectation:** Procedures are in place to: (1) inform users of content or applications that are not appropriate for children; (2) classify content and applications offered to children; and (3) verify the end user’s age when she or he seeks to access or use these products and services. |
**Guidance:** The company has in place or is working with others to develop a content classification/age rating system consistent with national and international standards for ICT or other media. Where content classification standards do not exist and the content is sensitive regarding children’s age/developmental stage, the company should provide advice and reminders about the nature and age-classification of the content.

Developing products and services with age classification systems in mind helps maximize age-targeted market potential and reduces risks of products and services falling into an age classification that the product or service was not developed for.

Enforce minimum age requirements, and support the research and development of new age-verification systems such as biometrics, using known international standards for the development of such tools.

Take steps to identify and remove underage users who have misrepresented their age to gain access. If they are not already in place, set up appropriate sign-on processes to determine whether users are old enough to access the content or service, and use nationally established age-verification systems linked to a reporting function or a help desk/centre that can encourage users to report people who have falsified their ages.

**Further action:** –

**Guidance:** –

### 3.2 Safe use of products and services

#### 3.2.1 Acting on complaints or product defects

**Baseline expectation:** *If a defect or risk for children is discovered in products, games, applications or services, the company has a process to recall the product or remove/improve content in a timely fashion.***

**Guidance:** Put in place a process to recall, modify or repair products with risks and defects. If there are any serious concerns regarding potential mental, moral or physical harm to children, the company should take immediate action.

Develop terms and conditions or acceptable use policies that explicitly state the company’s position on the misuse of its products or services to exploit or abuse children.

**Further action:** *Performance data and other relevant information on product and service complaints and defects impacting on children and actions taken as a result of the complaints/defects are published by the company, at least once a year and ideally more often.***

**Guidance:** Guidance on reporting on this topic, as well as specific indicators, is provided in UNICEF’s Children’s Rights in Sustainability Reporting (Second edition with a foreword by GRI), September 2014, [http://www.unicef.org/csr/reporting.htm](http://www.unicef.org/csr/reporting.htm). Sample indicators include: the percentage of significant product and service categories for which health and safety impacts are assessed for improvement; any banned or disputed products aimed at children or family use.

#### 3.2.2 Product and service misuse

**Baseline expectation:** *The company’s terms and conditions of service provision clearly communicate its policies and procedures regarding misuse of its products or services to exploit or abuse children.*
**Guidance:** Inform employees, customers, suppliers, service providers and other stakeholders about the available channels to report harm or risks to children related to products and services. Ensure the mechanism is accessible to children and those who can report incidents on their behalf, such as community members, local NGOs and government officials. Phone hotlines and online channels for reporting incidents can be effective.

**Further action:** Procedures are established for the company to assess and monitor use of its products and services to ensure that they are not used inappropriately to abuse, exploit or otherwise harm children. All business partners are required to have processes in place and clearly communicated to prevent and act upon misuse of products and services to harm children.

**Guidance:** Identify any risks that products and services may be used to exploit children. Assess whether products and services, including resources and facilities for customers, are likely to facilitate child exploitation and abuse directly or raise secondary or indirect risks stemming from their use. Based on the company’s assessment, take proactive steps to counter exploitation. Actions can include:
- product development or modifications that take specific risk factors into consideration;
- training for staff and awareness raising among staff and consumers on the legal, moral and physical ramifications of child exploitation and how and where this should be reported.
- partnering with stakeholders or law enforcement to prevent or address misuse of products to exploit or abuse children.

### 3.2.3 Data protection

**Baseline expectation:** The company sets clear standards for privacy and the collection and storage of personal data about or from children, not allowing this without the consent of parents.

**Guidance:** Ensure that data collection, storage and sharing meet legal requirements, and that the company transparent on how information will be used. Always encourage young children to obtain their parents’ and or guardians’ permission before giving any information online, including to a marketer – and include an age-verification mechanism as part of personal data collection.

**Further action:** All business partners are required to have processes in place and clearly communicated to prevent and act upon any violation of children’s right to privacy and data protection.

**Guidance:** Where personally identifiable information from children under age 13 is collected, used or disclosed, comply with requirements of the United States Federal Trade Commission ‘Children’s Online Privacy Protection Rule’ (COPPA) or equivalent. Information on complying with COPPA is available at [www.ftc.gov/tips-advice/business-center/guidance/complying-coppa-frequently-asked-questions](http://www.ftc.gov/tips-advice/business-center/guidance/complying-coppa-frequently-asked-questions).

### 3.2.4 Pricing

**Baseline expectation:** The company provides transparent, clear and stage-appropriate information about the costs of services, including add-on services. Services are not sold to underage customers, or as defined by local law.
**Guidance:** If services or content such as movies, television shows or games are designed for and/or marketed to children of a certain age or developmental stage, the appropriate information should be available in a format and language that is easy for the age group/development level to understand. Use available classification systems or laws to determine what is suitable for children at specific ages.

**Further action:** The company avoids default settings that would easily allow children to access premium services that require additional payment. In addition, it offers no-fee services or content that supports children’s well-being and promotes their rights, for example, children’s helplines.

**Guidance:** Avoid addressing children directly and encouraging them to buy virtual goods or credits with a mobile phone or other means that do not require prior parental control. Provide clear and early warning about additional costs to children and parents.

### 3.3 Responsible sales and marketing

#### 3.3.1 Marketing and advertising

**Baseline expectation:** The company has a global responsible marketing and advertising policy or code of conduct in place covering children and other vulnerable groups. Marketing policies encompass: (1) the effects on children of using unrealistic, unhealthy and sexualized body images in advertising; (2) the minimum age for targeting advertising towards children; (3) unsuitable marketing locations such as schools, playgrounds and other places where children frequently gather; and (4) guidelines for the appropriate use of children in advertising and marketing.

**Guidance:** Adopt a broad view of what ‘harmful’ means for children within the marketing and advertising policies. This requires making a conscious choice to refrain from direct marketing that is likely to harm children mentally, morally or physically. Ensure that the policy takes into account the effects of violent content and promoting behaviour that is unsafe or dangerous.

If the company operates in an area where national law is weak, vague or non-existent, be proactive and implement a marketing policy that incorporates existing best practices for advertising to children. Support government initiatives to develop appropriate standards that protect children’s rights.

Refer to relevant guidance on avoiding the commercialization and sexualization of children. Use the company’s participation and influence within trade groups or business associations to push for sector-wide principles or a code of conduct that restrains such practices.

Develop and disseminate messages and advertising to children and parents that promote healthy behaviours and products. Such messages should be positive in tone and make a compelling case for healthy behaviour by providing both accurate information and appealing results.


**Further action:** The company cooperates with and engages in voluntary marketing initiatives that take account of potential child-rights impacts related to product advertising aimed to reach children under age 13.

**Guidance:** Apply evolving best practices and join voluntary initiatives that establish marketing codes and standards.
3.3.2 Marketing and advertising policy, implementation and governance

**Baseline expectation:** The company’s responsible marketing policy or commitment is publicly available and communicated to all relevant internal teams. Focal points within the company are identified, and procedures for implementing the policy and taking action if violations occur are clearly communicated throughout business operations. In addition, the responsible marketing policy or commitment is actively promoted and enforced among all advertising and marketing agencies the company works with.

**Guidance:** Refer to relevant guidance on avoiding the commercialization and sexualization of children (see above). Use the company's participation and influence within trade groups or business associations to push for principles or a code of conduct for the entire sector to refrain from such practices.

Develop and disseminate messages and advertising to children and parents that promote healthy behaviours and products. Such messages should be positive in tone and make a compelling case for healthy behaviour by providing both accurate information and appealing results.

**Further action:** The company supports and promotes positive and healthy behaviour among children through marketing, advertising and communication channels by developing and promoting applications and services that support child development and promote responsible e-commerce. This could include, for example, communication to promote children’s responsible behaviour online or discourage excessive gaming.

**Guidance:** Join existing initiative or support government and national NGOs activities to promote healthy behaviour and products. Ensure that good practices for supporting children’s healthy lifestyles are implemented in all markets, and identify the age ranges for specific stages of childhood, such as preschool, pre-teen and adolescence.

Policies for children’s advertising should consider scheduling, frequency and the type of marketing being conducted for various age groups. Do not place advertisements in locations or venues that are likely to be frequented or accessed by children of inappropriate age groups for the product.

At a minimum, locations such as schools, childcare and early childhood education facilities should be free from commercial promotions that specifically target children. Take adequate security measures to protect children in all Internet-marketing venues, including social media, chat sites, blogs and web pages. Carefully consider product placement in stores, e.g., place unhealthy products on higher shelving and out of young children’s sight lines.

Children should be protected from being used and exploited as a ‘marketing technique’ to promote products of any type at schools or elsewhere. Do not hire children as ‘brand ambassadors’ or in peer-to-peer marketing at schools or on social networking sites. When children are represented in advertising and marketing, be sure that:

- Child, parent or guardian permission is obtained, and children’s safety is guarded in all cases.
- Age-appropriate contexts, content, setting, dress and time are observed.
- Images of children taken in the public realm are rendered unidentifiable.

3.3.3 Digital advertising
Baseline expectation: The marketing policy takes into account the potential impacts of marketing to children specifically through the use of digital media. Measures to implement the policy align with global standards such as the International Chamber of Commerce framework. When acting as a content distributor for online or media content, the company has implemented processes to avoid exposing children to inappropriate advertising in any form of online media. The company also avoids addressing children directly and encouraging them to buy virtual goods or credits with their mobile phone or other means that do not require prior parental consent.

Guidance: Regularly update the company’s marketing and advertising policy to reflect the rapidly changing media landscape. This enables businesses to recognize and proactively address the potentially adverse impacts of digital media, including the use of personalized promotions aimed specifically to children.

Further action: The company actively engages with its partners to provide content and applications to ensure that children’s rights are considered in development of advertising apps and other digital advertising and marketing tools.

Guidance: –

3.4 Remedy

3.4.1 Customer service and complaints mechanism

Baseline expectation: An accessible customer service channel and grievance mechanism and/or other remedies are in place and clearly communicated to customers. Within the company, there is an established and clearly communicated process for receiving, handling, investigating and responding to complaints from customers and the general public, including children, about content and applications targeting children.

Guidance: Inform employees, customers, suppliers, service providers and other stakeholders about the available channels to report harm or risks to children related to products and services. Make sure that customer service agents are able to forward complaints to the appropriate department.

Ensure the mechanism is accessible to children and those who can report incidents on their behalf, such as community members, local NGOs and government officials. Phone hotlines and online channels for reporting incidents can be effective.

Further action: If children and adolescents report having been abused while using the products, refer them to local key stakeholders within the child protection system (e.g. child helplines, law enforcement).
## 4. Procurement

### 4.1 Supplier code of conduct or policies

#### 4.1.1 Supplier code of conduct

**Baseline expectation:** *The company has established a supplier code of conduct or policy statement concerning human rights, including labour rights and children’s rights, and makes this code/policy publicly available. The code of conduct for suppliers requests suppliers to have family-friendly policies in place, including coverage related to pregnancy and maternity, in accordance with ILO conventions to accommodate, prohibit discrimination against, and ensure adequate standards of living for workers with family responsibilities and young workers.*

**Guidance:** A global code of conduct for suppliers should be publicly available, and cover a wide range of issues, including:

- Compliance with health, safety, environmental, labour and anti-corruption laws and standards.
- Specific sections on human rights and children’s rights, particularly relating to treatment of underage workers, age limits and required controls.

Request that suppliers develop policies that outline employees’ right to decent working conditions, including but not limited to statutory sick pay, overtime pay, social contributions, living wages, parental leave, flexible working practices, family health policies, special arrangements for migrant workers and childcare arrangements.

**Further action:** *All elements of the code of conduct are built into contract conditions and are represented in dialogue, self-assessment, audits, training and capacity-building opportunities for suppliers, subcontractors, customers and other business partners. Where possible, the company fosters long-term relationships with suppliers, contractors and subcontractors – and uses its influence to develop their respect for children’s rights.*

**Guidance:** Ensure the respect for core labour standards and human rights within the company’s own operations and throughout the value chain.

#### 4.1.2 Training on the supplier code of conduct

**Baseline expectation:** *Training programmes are provided for managers, procurement staff and other employees who purchase products and services, as well as suppliers. The programmes promote the company’s child labour policy throughout the supply chain.*

**Guidance:** Training for sourcing and procurement teams should cover practices to recognize and prevent child labour, including how to spot ‘red flags’ in the use or risk of child labour relevant to mobile operators and the company’s specific locations of operations.

Provide training to suppliers to help them understand company requirements, and the benefits of responsible business practices.
**Further action:** The company provides additional training on country-specific issues for managers, procurement employees and suppliers. In addition, it promotes capacity building on child labour and other child rights-related risks for suppliers, in cooperation with other companies in the industry and external support such as government agencies and non-governmental organizations.

**Guidance:** –

**4.1.3 Compliance with national laws/international standards**

**Baseline expectation:** In regard to human rights, including labour rights in general and those of young workers and children specifically, the company’s supplier code of conduct demands suppliers’ and distributors’ compliance with all national laws and regulations or international standards, whichever is the highest, in terms of the risk profile of the country in question. The company has established a supply chain assessment and/or auditing programme that takes into account country- and industry-specific issues, including those related to young workers and children’s rights.

**Guidance:** Develop a policy with explicit reference to ILO Convention No. 138 on the minimum age for employment and work, and ILO Convention No. 182 on the prohibition and immediate action for the elimination of the worst forms of child labour.

Make sure the policy clearly states the minimum age for employment in line with national law or international standards, whichever is higher. Include the definition of ‘child labour’ – for example, that the minimum age for any employee is 15 or the minimum school leaving age, whichever is oldest, unless a minimum age of 14 has been agreed through consultation with the national government and employers’ and workers’ organizations.

**Further action:** Factors related to children’s rights are highlighted and given priority in the company’s social and environmental assessments, and audits to screen, select, monitor and prioritize supplier relationships.

**Guidance:** Ensure that respect for children’s rights is built into contract modalities and conditions and represented in dialogue, self-assessment, audits, training and capacity-building opportunities for suppliers. Where possible, foster long-term relationships with suppliers – and use the company’s influence to develop their respect for children’s rights.

**4.1.4 Minimum age requirements**

**Baseline expectation:** The supplier code of conduct clearly states the minimum age for employment in line with national law or international standards, whichever is the highest. A process is in place for monitoring, reporting and managing cases where children below the minimum age are discovered in the supply chain and distribution network. In addition to monitoring, the company has a clearly defined plan for improving compliance, and takes corrective action with suppliers/distributors that do not adequately respond to the compliance improvement plans.
**Guidance:** Continuously monitor and analyse (as the company alone or in partnership with others) information on children employed in violation of minimum age requirements. This information will provide knowledge on the situation, trends and impact of company actions to address minimum age violations. Aim to remove children from child labour – and immediately from hazardous situations – while providing alternatives that prevent them from being pushed into more dangerous survival alternatives, such as sexual exploitation or trafficking.

Before an underage worker is dismissed from employment, make sure a remediation programme is available, such as assistance with access to education, transitional schooling or vocational training, or replacing a child labourer with an adult family member to compensate for the family’s loss of income.

Keep in mind that each incident requires an approach tailored to the child’s age, working conditions, home situation and education level, and the availability of schooling. Companies can cooperate with parents or caregivers, schools, government agencies, and local NGOs and international child rights organizations to find the best solution.

**Further action:** The company proactively works in partnership with suppliers/distributors on projects that help minimize non-compliance, for example, training and improved monitoring systems.

**Guidance:** Ensure that respect for children’s rights is built into contract modalities and conditions, and represented in dialogue, self-assessment, audits, training and capacity-building opportunities for suppliers. Where possible, foster long-term relationships with suppliers – and use the company’s influence to develop their respect for children’s rights.

4.1.5 Ethics and reporting

**Baseline expectation:** The supplier code of conduct addresses corruption, taxation and bribery. The company has a process in place for monitoring, reporting and managing cases where corruption, taxation avoidance or bribery is discovered. In addition to monitoring, the company has a clearly defined process to put in place corrective action plans and eventually delist/deselect suppliers that do not adequately respond to compliance improvement plans.

**Guidance:** Establish a zero-tolerance policy on any and all forms of bribery, corruption, extortion and embezzlement, and outline the terms of enforcement. Provide a statement on how the company meets national legislation and international principles on corporate tax obligations. This should include a commitment to pay all taxes, fees and royalties to local governments in countries of operation.

**Further action:** The company publicly reports performance against the supplier code of conduct, including children’s rights violations and remedies.

**Guidance:** Guidance for reporting on adherence to the supplier code of conduct can be found in UNICEF’s Children’s Rights in Sustainability Reporting (Second edition with a foreword by GRI), September 2014, [www.unicef.org/csr/reporting.htm](http://www.unicef.org/csr/reporting.htm) and the Global Reporting Initiative (GRI) G4 Guidelines [www.globalreporting.org](http://www.globalreporting.org).

4.1.6 Exploitation and abuse
**Baseline expectation:** The supplier code of conduct includes a zero-tolerance policy on violence, exploitation and abuse of children, including but not limited to sexual exploitation and trafficking, to be applied throughout the suppliers’ value chain. A process in place for monitoring, reporting and managing cases where child exploitation is identified. In addition to monitoring, the company has clearly defined corrective action plans and will eventually delist/deselect suppliers that do not adequately respond to these plans.

**Guidance:** Consider establishing a child protection policy or code of conduct that stipulates zero tolerance for any type of violence, exploitation or abuse of children. Integrate this zero-tolerance clause into other relevant company policies. This is particularly relevant if the company provides services to children, has direct contact with children, or if the business is located in an environment where there is a significant presence or risk of child exploitation.

**Further action:** The company publicly reports performance against the supplier code of conduct, including children’s rights violations and remedies.

**Guidance:** Guidance for reporting on adherence to the supplier code of conduct can be found in UNICEF’s Children’s Rights in Sustainability Reporting (Second edition with a foreword by GRI), September 2014, [www.unicef.org/csr/reporting.htm](http://www.unicef.org/csr/reporting.htm) and the Global Reporting Initiative (GRI) G4 Guidelines [www.globalreporting.org](http://www.globalreporting.org).

### 4.1.7 Grievance mechanism (reporting violations)

**Baseline expectation:** The supplier code of conduct requests suppliers to have channels and processes in place for receiving, processing, investigating and responding to complaints related to risks to and impacts on children’s rights, including violations of child labour law and the rights of young workers and pregnant women – with procedures in place for monitoring, reporting and managing cases where grievance mechanisms are found to be inadequate. In addition, the company has a clearly defined process to develop corrective action plans and eventually delist/deselect suppliers that do not adequately respond to these plans.

**Guidance:** Inform employees, community members, suppliers, service providers and other stakeholders about the grievance mechanism and available channels to report occurrences of environmental risks or impacts related to children and pregnant women.

Ensure the mechanism is accessible to children and those who can report incidents on their behalf, such as community members, local NGOs and government officials. Making a physical space available through an NGO and offering a phone hotline or online channels for reporting incidents can be effective. Take illiteracy and local languages into consideration.

**Further action:** The company publicly reports performance against the supplier code of conduct, including children’s rights violations and remedies.

**Guidance:** Guidance for reporting on adherence to the supplier code of conduct can be found in UNICEF’s Children’s Rights in Sustainability Reporting (Second edition with a foreword by GRI), September 2014, [www.unicef.org/csr/reporting.htm](http://www.unicef.org/csr/reporting.htm) and the Global Reporting Initiative (GRI) G4 Guidelines [www.globalreporting.org](http://www.globalreporting.org).

### 4.1.8 Safety of mobile networks and devices
Baseline expectation: The supplier code of conduct requires providers of mobile handsets and network equipment to test that their products operate within the safety guidelines defined by the International Commission on Non-Ionizing Radiation Protection (ICNIRP) or other relevant standards. The company has a process in place for monitoring, reporting and managing cases where product safety is found to not meet ICNIRP standards. In addition to monitoring, the company has a clearly defined process to develop corrective action plans and eventually delist/deselect suppliers that do not adequately respond to non-compliances.

Guidance: Require all network equipment vendors to manufacture and test radio equipment regularly to ensure that it functions within the limits set by ICNIRP or any local standards for EMF emissions. Require that handset vendors communicate the handsets’ SAR (specific absorption rate) levels to ensure that levels remain significantly below international recommendations.

Further action: –

Guidance: –

4.1.9 Selecting suppliers

Baseline expectation: The supplier selection and tendering process includes steps to screen, select, evaluate and prioritize suppliers based on social and environmental criteria, including children’s rights.

Guidance: Procurement teams should participate in training on children’s rights as relevant to criteria for assessing and selecting suppliers. Significant non-compliance with the company’s selection criteria should prevent the use of the supplier – when this occurs, inform the supplier that the selection criteria were not met, and why they were not met, and encourage the supplier to demonstrate compliance and reapply for supplier status.

Further action: The company’s contract conditions and code of conduct for suppliers are reviewed periodically to ensure that children’s rights expectations are current and continually improved.

Guidance: Companies can leverage ongoing research and insights by experts in child rights such as UNICEF, the UN Global Compact, ILO and others to ensure the latest intelligence and expectations on child rights are incorporated into contracts and code of conduct for suppliers.

4.1.10 Identifying high-risk suppliers

Baseline expectation: The company identifies high-risk suppliers or purchased items that may have a greater negative impact on children’s rights. Clear procedures in place for identifying and addressing the worst forms of child labour, including hazardous work, trafficking, sexual exploitation, debt bondage and forced labour in the supply chain. The company requires additional due diligence or assessments and reporting from suppliers that are identified as higher risk of engaging in the worst forms of child labour.

Guidance: Assessing supplier risks should include an evaluation of the risk of, scale and extent of children’s rights impacts in the supply chain. Additional monitoring of the expectations for suppliers can be put in place to reduce the risk of children’s rights violations.
**Further action:** The company participates in collaborative industry initiatives to improve supply-chain management in high-risk countries to maximize collective influence in addressing child rights-related issues in a particular country.

**Guidance:** –

### 4.1.11 Monitoring suppliers

**Baseline expectation:** The company’s supplier monitoring and capacity-building activities include regular monitoring through self-assessments of code compliance, with the aim of continually improving performance. Regular on-site audits of suppliers are conducted, and the company has clearly defined its process to delist/deselect suppliers that do not adequately respond to these audits.

**Guidance:** Establish procedures and practices to prevent, identify and investigate alleged abuse, intimidation, harassment, trafficking, sexual exploitation and labour exploitation of a child in the supply chain. If child rights violations are discovered, arrange immediate assistance for the child and referral to the appropriate local child protection authority or, if no government authority is available, refer to a local child rights NGO.

Where non-compliance is found through periodic monitoring, implement clear improvement action plans and expectations for performance improvement, including goals that are specific, measurable, attainable, relevant and timely. Work with suppliers to implement solutions.

**Further action:** Where possible, the company fosters long-term relationships with suppliers, contractors and subcontractors – and uses its influence to develop respect for children’s rights.

**Guidance:** Example may be through partner projects that target performance improvements in areas of high risk or poor performance.

### 4.1.12 Suppliers in conflict zones

**Baseline expectation:** The company’s procurement policy and process addresses the heightened risk of human rights and child rights violations during armed conflict in the sourcing country or region. Suppliers are required to demonstrate the sourcing of raw materials used to produce their products through existing certification and transparency mechanisms. This includes complying with relevant ‘conflict minerals’ legislation in markets of operation, and demonstrating that the supply of minerals and other resources used in their products is not financing armed conflict.
**Guidance:** Assess or reassess the company’s and suppliers’ impact on children in conflict situations as part of heightened attention to due diligence. Collect detailed information from such sources as United Nations human rights mechanisms, including reports of the Special Representative of the Secretary-General for Children and Armed Conflict, to inform due diligence or update an existing assessment.

Depending on the company’s operations, monitoring systems will need to be strengthened to ensure that children’s rights and labour standards are rigorously applied in locations affected by conflict. Also be alert to the increased risk of trafficking for labour or sexual exploitation of children who have been separated from their families.

Understand, follow and monitor the application of guidelines for business operations in conflict zones, especially as they:

- Urge the protection of children against recruitment into armed groups by private security providers or a country’s formal armed forces.
- Suggest safeguards against trafficking or sexual exploitation for children separated from their families or relatives.
- Respect child labour standards, supply chain integrity and other principles.

For all suppliers, partners or others with whom the business is linked, include contractual requirements that these parties will inform the company of all relevant business relationships, including with other suppliers, subcontractors and associates; promptly address issues of non-conformance related to children’s rights as and when they arise; participate in any child-focused human rights and social compliance monitoring organized by the company. This could be done by making the supplier code that includes these provisions a mandatory annex to all supplier agreements.

**Further action:** *The company participates in collaborative industry initiatives to improve supply-chain management in high-risk countries in order to maximize collective influence in addressing child rights-related issues in a particular country.*

**Guidance:** Where country-specific industry initiatives do not exist, leverage regional or international initiatives. In countries deemed high-risk, companies may also consider partnering with local stakeholders to form multi-stakeholder initiatives where they do not currently exist.

### 4.1.13 Environment and child rights

**Baseline expectation:** *The company’s environmental and resource-use polices and processes take into account potential and actual impacts on children. The company has a responsible electronic waste management system to ensure that e-waste is only sold to certified suppliers that will treat any hazardous chemicals and materials responsibly.*

**Guidance:** Integrate children’s rights considerations into relevant supplier environmental policies. Target and monitor emissions standards and toxicity levels, and take children’s specific vulnerabilities to resource scarcity, pollution and toxicity into account in environmental and health impact assessments.

**Further action:** *The company supports a ‘life cycle’ approach to end-of-life products and equipment, with processes and systems to trace and take back these products. It also supports the development of industries related to reprocessing and obtaining new value from end-of-life equipment, such as through reuse and materials recycling.*

**Guidance:** –
## 5. Network Operations

### 5.1 Network operations

#### 5.1.1 Network expansion and deployment

**Baseline expectation:** The company has a policy on environmental impact, land and natural resource use and acquisition relating to network deployment. This policy takes into account children’s specific vulnerabilities and rights when evaluating the siting of and securing access to base station sites – taking care to ensure that children are not likely to gain access to dangerous equipment or towers.

**Guidance:** In network deployment, consider how affects on the environment could impact children. To ensure that sites are not accessible to children, consider their proximity to homes, schools or other areas where children are likely to be present. The sites should always be fenced or additionally guarded, including during the construction phase, to make sure that children cannot access the site, climb towers or come in contact with dangerous equipment.

**Further action:** The company fosters long-term relationships with network suppliers, contractors and subcontractors, and uses its influence to develop their respect for children’s rights through advocacy, dialogue and training.

**Guidance:** –

#### 5.1.2 Impact of network deployment on families and communities

**Baseline expectation:** The company carries out stakeholder consultations that include potentially affected families as part of its network deployment planning.

**Guidance:** If land purchase or access-road construction is needed in order to install base station sites, apply international standards for land and property inheritance to prevent children, and especially girls, from losing inheritance and property rights.

Take steps to ensure that relocated children and their families have adequate housing, supporting documents and uninterrupted access to basic services, such as schools, health clinics, water and sanitation, and local transportation. The quality of their new housing or land, and the legal nature of the land title, should be at least equivalent to those of the old site as a minimum of secure tenure. Relocations should include necessary documentation to ensure that children can enrol in school in their new location.

**Further action:** The deployment projects take into account possibilities to positively affect the community members’ lives, and especially children, through access to power and new technologies.

**Guidance:** For example, access to such resources may decrease the digital divide for communities providing (and/or improving) access to technology for key community resources (e.g. schools, hospitals, local government).

#### 5.1.3 Network maintenance
Baseline expectation: The company’s environmental and resource-use policy and targets, especially in the context of network operations, take into account the potential and actual impacts on children. Network maintenance includes regularly checking the electromagnetic field (EMF) emission levels of base station sites to ensure these operate within safety limits set by the ICNIRP. Clearly communicated mechanisms are in place for the local community to contact the company in case of concerns relating to current base station sites, including concerns related to children’s rights.

Guidance: Integrate children’s rights considerations into relevant environmental policies, including respect of international and national standards and limits on EMF emissions. Take into account children’s specific vulnerabilities to resource scarcity, pollution and toxicity in environmental and health impact assessments. Regular EMF checks should be carried out by equipment vendors, network maintenance teams, tower companies or managed services providers maintaining sites.

Further action: The company fosters long-term relationships with network suppliers, contractors and subcontractors, and uses its influence to develop their respect for children’s rights through advocacy, dialogue and training.

Guidance: –

5.1.4 Remedy regarding network deployment and operation

Baseline expectation: In regard to network deployment and base station operations that are accessible to children and their families, the company has mechanisms in place to receive, process, investigate and respond to any complaints linked to land and natural resource use and acquisition, including resettlement.

Guidance: Inform employees, community members, suppliers, service providers and other stakeholders about the grievance mechanism and available channels to report risks to or impacts on children related to natural resource use, acquisition and resettlement including related to network deployment and operations. Ensure the mechanism is accessible to children and those who can report incidents on their behalf, such community members, local NGOs and government officials. Making a physical space available through an NGO and offering a phone hotline or online channels for reporting incidences can be effective. Take illiteracy and local languages into consideration. Consider an award or other incentive system to reward staff for bringing grievances forward to facilitate adjudication of grievances and underline the necessity for transparency.

Further action: The company evaluates the nature of complaints over time to establish if improvements can be built into planning and design of future network operations.

Guidance: –
## 6. Security

### 6.1 Security

#### 6.1.1 Children’s rights in security arrangements, policies and process

**Baseline expectation:** *A policy is in place related to procurement of security services, covering both public and private security service providers that incorporates respect for children’s rights and prohibits the use of children in security arrangements. A process is in place to identify, assess and monitor risks to and impacts on children’s rights related to security arrangements.*

**Guidance:** Policies regarding security and human rights should specifically refer to children’s rights, including the prohibition of recruitment or use of children in security arrangements, both directly and indirectly through security providers. This means that anyone under age 18 should not be engaged for military purposes, and should not be used by the security provider for any other tasks – including food preparation, logistics, administration and espionage.

Outline a strict code of conduct against physical punishment or child abuse, and describe the disciplinary proceedings against any security personnel who have perpetrated such abuse.

Conduct proper risk assessment to understand the potential for violating human rights, including the rights of children in contact with security services related to guarding corporate offices, personnel and assets such as base station sites and data centres. These assessments can include:

- Identification of security risks that may result from political, economic, civil or social factors, or the possibility of heightened levels of risk in particular facilities or communities.
- Assessment of the potential for violence, which can be better understood through consultation with civil society organizations and host governments.
- Human rights records, such as those available in regard to public security forces, paramilitaries, and local and national law enforcement, as well as the reputation of private security. Consult with the wider community rather than relying solely on official records.
- Rule of law, considering the local prosecuting authority and judiciary capacity to hold accountable those who are responsible for human rights abuses.

**Further action:** –

**Guidance:** –

#### 6.1.2 Use of force and treatment of children during interactions with security personnel

**Baseline expectation:** *The company’s security policy encompasses guidelines on appropriate communication, conduct and use of force in situations where children have witnessed or are victims of policy violations, or have allegedly committed an offence on company property. Security personnel receive training on the company’s policy, children’s rights and child protection.*
Guidance: Training for security personnel should include common scenarios in which violations against children might take place, and the procedures they should follow in order to avoid such violations. Describe the legal consequences of infringements for both the company and the security provider.

Emphasize respect for children’s rights and the necessity of enforcing child protection measures, and include information on child-specific reactions to stress, how to communicate with children, and how to approach them as perpetrators, victims or witnesses.

Training on appropriate behaviour when encountering potential child perpetrators is particularly important. Use of physical restraint and force on children is to be strictly exceptional, employed only when all other control measures have failed and for the shortest possible time. In addition, prohibit security personnel from forcing children to carry out unpaid personal services.

Further action: –

Guidance: –

6.1.3 Compliance with national laws/international standards

Baseline expectation: The company considers children’s rights and specific needs in contingency planning for emergency situations (business continuity management) caused by business operations, conflicts or other types of emergencies, including children of employees or in the community. Due diligence processes address the heightened risk of child rights violations during armed conflict. The company has a process in place to ensure it does not exacerbate discrimination and tensions between the communities that are involved in conflict.

Guidance: Assess or re-evaluate the company’s impact on children in conflict situations as part of heightened attention to due diligence. To inform due diligence or update an existing assessment, collect detailed information from such sources as United Nations human rights mechanisms, including reports of the Special Representative of the Secretary-General for Children and Armed Conflict.

Depending on the company’s business operations, monitoring systems will need to be strengthened to ensure that children’s rights and labour standards are rigorously applied. Also be alert to the increased risk of trafficking for labour or sexual exploitation of children who have been separated from their families.

Understand, follow and monitor the application of guidelines for business operations in conflict zones, especially as they:

• Urge the protection of children against recruitment into armed groups by private security providers or a country’s formal armed forces.

• Suggest safeguards against trafficking or sexual exploitation for children separated from their families or relatives.

• Respect child labour standards, supply chain integrity and other principles.

Ensure the company’s practices are non-discriminatory (ethnic, religious, political affiliation, gender, disability and other grounds) in recruitment, occupation assignment, remuneration, training, promotions and retrenchment.

Mobile operators should also take part in broad community participation and engagement. Constructive and regular engagement with a range of stakeholders can ensure that the company does not unintentionally benefit one group over the other, and help the company to build trust with all concerned parties in a context where there is distrust and/or violence.

In regard to emergencies, assess or re-evaluate the impact of the business on children, and address the company’s role during emergencies. Be sure to consider the particular rights and needs of children and pregnant women in surrounding communities in vulnerability analyses, contingency planning and during times of emergency, evacuation, and warning procedures and drills. Identify the specific resources and capabilities that would be required to protect children in different disaster scenarios related to company operations, and ensure proper communication and partnerships with emergency services.
### 6.1.4 Freedom of expression during emergency situations

**Baseline expectation:** The company has a policy and defined procedures in place to respect children’s right to free speech and access to information.

**Guidance:** Educate colleagues about the principles of humanitarian action and the protection of children’s rights. International standards and other instruments seeking to protect children, include the CRC, the Convention on the Elimination of All Forms of Discrimination Against Women, the ILO Convention on the Worst Forms of Child Labour, among others. Mobile operators can play a role in learning about these standards and sharing them with the workforce and throughout the value chain.

**Further action:** Where it is legally possible, the company publishes information on situations in which freedom of expression among users of its products/services has been threatened and how the company has responded.

**Guidance:** As the world becomes increasingly dependent on mobile technology, mobile operators face challenges where basic rights – such as freedom of expression – are threatened in the name of national or global security. For example, network shutdowns instigated by government as a result of perceived threats during crisis. Transparency in reporting among mobile operators is increasing. Knowing that a company acknowledges a threat exists and has a process in place to address this helps build and preserve authentic relationships with stakeholders.

### 6.1.5 Grievance mechanism regarding security services

**Baseline expectation:** Mechanisms are in place to receive, process, investigate and respond to any complaints linked to the company’s use of security services that are accessible to children and their families.

**Guidance:** Inform employees, community members, suppliers, service providers and other stakeholders about the grievance mechanism and available channels to report risks to or impacts on children related to natural resource use, acquisition and resettlement including related to network deployment and operations.

Ensure the mechanism is accessible to children and those who can report incidents on their behalf, such community members, local NGOs and government officials. Making a physical space available through an NGO and offering a phone hotline or online channels for reporting incidences can be effective. Take illiteracy and local languages into consideration. Consider an award or other incentive system to reward staff for bringing grievances forward to facilitate adjudication of grievances and underline the necessity for transparency.

**Further action:** The company evaluates the nature of complaints over time to establish if improvements can be built into planning and design of future operations.

**Guidance:** —