Module 3: Child Rights Due Diligence in the ICT Sector
Learning objective and agenda

Overview of key principles and elements of child rights due diligence, including a review of UNICEF’s Mobile Operator Child Rights Self-Impact Assessment tool

✧ Child Rights Due Diligence Principles & Elements
✧ UNICEF’s Mobile Operator Child Rights Self-Impact Assessment Tool (MO-CRIA)
  ✧ Assessment Process in Detail
  ✧ Key Areas of the MO-CRIATool
  ✧ Continuous Improvement
✧ Exercise: Conducting a Child Rights Self-Impact Assessment
✧ Questions / Feedback
Child Rights Due Diligence Principles & Elements
The role of due diligence in protecting children’s rights

CRBP highlights the importance of human rights due diligence in respecting & protecting child rights

1. **ALL BUSINESS SHOULD ➔➔➔**

   - Recognizing the **core principles** underpinning children’s rights
   - Meeting the **responsibility to respect** children’s rights
   - Becoming a **champion** for children’s rights
   - Making a **commitment** to support the human rights of children

2. **Meet their responsibility to respect children’s rights and commit to supporting the human rights of children**

   Through appropriate policies/processes:
   1. Policy commitment to respect child rights
   2. Human rights due diligence (including child rights)
   3. Remediation processes

Opportunities to support rights of children often identified through human rights due diligence
Key steps to protecting and respecting children’s rights

The importance of effective policy development and remediation efforts

1. Policy Commitment

CRBP Principle 1: Respect and support human rights of children

- Establish grievance mechanisms accessible to children / families, in local languages
- Conform to principles of legitimacy, accessibility, predictability, equitability, transparency and compatibility
- Promote to users and parents
- Communicate outcomes of remediation

2. Due Diligence

- Commit to respect children’s rights
- Clarify expectations for all stakeholders impacting operations, products, services
- Integrate into existing policies (e.g. Code of Conduct) and/or create stand-alone policy
- Ensure Senior Executive sign-off
- Engage, communicate and report
- Embed into corporate policies / procedures impact and risk assessments and actions

3. Remediation
Child rights due diligence

The incorporation of child rights into corporate due diligence processes is often limited to child labour

Effective due diligence should expand beyond child labour

- Adverse impacts on children through the use of products or services
- Risks to the business associated with child rights impacts
- Impacts and risks at a national level
- Impacts and risks at a product and technology level
- Third party suppliers and business partners
- Impacts on different age groups
- Opportunities for positive impacts
- Sufficient training for employees who are involved and in contact with children
Children’s rights due diligence

Key components of effective human rights due diligence

UN Guiding Principles defines human rights due diligence

Key Due Diligence Steps:
- Assessing actual and potential impacts
- Integrating and acting on findings
- Tracking responses
- Communicating on how impacts addressed

Process to identify, prevent, mitigate and account for impacts

Response integrated into procedures and systems
Responsibility at the appropriate level
Sufficient resources
Oversight to assess performance

Characteristics of effective due diligence
How products/services of mobile operators can impact children

Example value chain of the mobile technology sector

- **Materials and components**: Primary materials to components, integration and product supply
- **Manufacturing**: Devices and Platforms that enable mobile devices to operate
- **Devices & operating systems**: Other Networks, e.g. Wifi
- **Mobile Networks**: Device partners, Network partners and other providers
- **Sales channels Retailers/ Sales agents**: Sales Teams, Contracted agents, Marketers, Retail partners
- **App developers, Website owners/ developers, Product and service development teams**: Device partners, Product and service development teams
- **Internet**: Provides access to services and apps
- **Mobile Services**: ISP’s, Operations, Service and in-house app owners, external service and app providers
- **Apps**: Users, Parents or carers, service communities
- **Content**: Provides content development that users access on mobile devices
- **Users**: Internet Apps, Mobile Services
- **Service use**: Users, Parents or carers, service communities
Introduction to the MO-CRIA tool

Working with industry, experts, NGOs and other partners UNICEF has developed a tool that can be used for child rights due diligence

Developed in 2015, based on leading human rights & child rights guidelines, MO-CRIA offers mobile operators:

- An understanding of challenges, opportunities and child rights impacts
- Guidance on how to mitigate potential negative impacts and promote positive impacts
- An easy-to-use and comprehensive self-assessment framework to analyse and manage potential and actual impacts on child rights
- Understanding of strengths and weaknesses in managing child rights within the company’s value chain
- Valuable feedback to develop plans and training programmes to enhance child rights management within the organization

Based on initial work by:
Conducting a MO-CRIA self-assessment

Leveraging the MO-CRIA xls tool & guidance document companies can conduct an in-depth self assessment of child rights impacts

A. Assessment Preparation: Desktop research, value chain mapping, identifying stakeholders necessary for assessment

B. Conducting Assessment: Using MO-CRiA tool analyze impacts by business function

CSR/Sustainability & Compliance  Human Resources  Product, Sales & Marketing  Procurement  Network Operations  Security & Emergencies

C. Tool Outcomes: Self-assessment of a mobile operator’s management of and impact on child rights, including visual/data outputs

D. Improving Practices: Review findings and develop priorities / action plans to address weaknesses/areas of significant risk
Assessment preparation – engagement & planning considerations

Careful internal and external engagement can help inform the assessment, educate, build support and enable action

1. **Identify leader** to conduct assessment

2. Garner **internal buy-in** / communicate benefits of assessment

3. **Map management/staff** to be involved

4. Ensure representation from **high-risk regions**

5. Hold **orientation discussions**

6. **Engage external experts** on child rights

<table>
<thead>
<tr>
<th>Stakeholder</th>
<th>Role</th>
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<tbody>
<tr>
<td>Human Rights/Corporate Responsibility specialist</td>
<td>Coordinating and leading the assessment</td>
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<tr>
<td>Senior Managers/Accountable role</td>
<td>Sponsoring assessment, ensuring buy in from colleagues, agreement to support resultant actions</td>
</tr>
<tr>
<td>Representatives from across business functions and markets</td>
<td>Ensuring local operations and conditions, as well as business process are understood across the company</td>
</tr>
<tr>
<td>Representatives from across business functions and markets</td>
<td>Making sure the company’s self-assessment is accurate and comprehensive, including representing business partners and supplier performance</td>
</tr>
<tr>
<td>NGO’s, Hotlines, Government Agencies, Academics etc.</td>
<td>Providing expertise on child rights; risks, issues, hotline and helpline availability, legislation and potential solutions</td>
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Conducting a self-assessment with the MO-CRIA tool

Assessing baseline performance and opportunities for further action

1. Interview/engage with stakeholder necessary to assess criteria, record details

2. Leverage tables in the guidance document to assess adherence to baseline and further action criteria
Conducting a self-assessment with the MO-CRIA tool

Assessing baseline performance and opportunities for further action

3. Complete notes and evidence

What is your company currently doing? What is the evidence of this?

Keep an organized, easy to access archive of evidence

<table>
<thead>
<tr>
<th>Notes on status</th>
<th>Evidence</th>
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<tbody>
<tr>
<td><strong>Baseline: Criteria met.</strong></td>
<td>Global Code of Conduct, Supplier Code of Conduct (<a href="http://www.xxx.com">www.xxx.com</a>)</td>
</tr>
<tr>
<td>Code of Conduct includes specific direction surrounding child rights. Key stakeholders engaged to inform integration of child rights.</td>
<td>Additional details are available in the 2015 Sustainability Report, page XX, XX and XX.</td>
</tr>
<tr>
<td>Child rights impacts addressed in Code of Conduct training.</td>
<td>Policy mapping: see attached PPT summary of policy mapping for child rights and stakeholder engagement as part of process. Engaged 15 stakeholders including government, NGOs, child rights experts.</td>
</tr>
<tr>
<td>Child rights considerations part of human rights impact assessments.</td>
<td>Training/capacity building: see attached Code of Conduct training outline.</td>
</tr>
<tr>
<td><strong>Further Action: Not met.</strong></td>
<td></td>
</tr>
<tr>
<td>Codes and policies integrate international standards, however, have not included specific reference to each standard. Need to conduct mapping of standards against policy and update policy to note these.</td>
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Conducting a self-assessment with the MO-CRIA tool

Assessing risk and priority to determine next steps, allocation of resources

**Risk**

- **Business Risk**
  (e.g. financial liability, reputational damage, license to operate)

- **Impact Risk**
  (likelihood, severity of impact on children)

**Priority**

- **Risk**
  (what were outcomes of risk assessment for this area?)

- **Progress**
  (what is the company’s progress in this area?)

Engage stakeholders to inform impact risk

Final risk should assume highest risk of two

**Optional task**

Helps identify priorities, integrate into existing human rights and corporate risk management processes

Final risk should assume highest of two
Conducting a self-assessment with the MO-CRIA tool

Leverage tool outputs to develop action plan to improve management of child rights impacts

Raw data and visual outputs summarize performance showing progress according to business function.
The structure and scope of the MO-CRIA tool

*Each business function has a range of criteria covering these areas*

<table>
<thead>
<tr>
<th>CSR &amp; Compliance</th>
<th>Human Resources</th>
<th>Products, Sales &amp; Marketing</th>
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<tbody>
<tr>
<td>Policies and impact assessment frameworks</td>
<td>Employment-related policies</td>
<td>Products and services (development, and making them available to customers)</td>
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<tr>
<td>Grievance mechanisms and remediation</td>
<td>Young workers’ rights and managing risks</td>
<td>Safe use of products and services</td>
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<tr>
<td>Stakeholder engagement and partnerships</td>
<td>Training and development opportunities for young people</td>
<td>Responsible sales, advertising and marketing</td>
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<tr>
<td>Disaster relief</td>
<td>Family-friendly policies and benefits</td>
<td>Accessible remedy for customers</td>
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<td>Children and the Internet</td>
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<td>Socio-economic contribution to the local economy</td>
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<tr>
<td>Supplier code of conduct and policies</td>
<td>Network operations</td>
<td>Security arrangement and policies</td>
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<tr>
<td>Supplier training</td>
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<td>Emergency and conflict situations</td>
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<tr>
<td>Monitoring and supplier review</td>
<td></td>
<td>Freedom of expression</td>
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<tr>
<td>Land, the environment and child rights</td>
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*Procurement*

- Security arrangement and policies
- Emergency and conflict situations
- Freedom of expression

*Network Operations*

- Remedy regarding network operations
Translating Outcomes Into Action
What’s next?

Ensuring outcomes of the child rights impact assessment translates into actions and improvements

Developing a continuous improvement process for managing child rights impacts

Conduct CRiA Assessment

Conduct Research / Engage Stakeholders to Monitor Impact Area Changes

Review Findings & Identify Priorities

Develop Action Plans & Allocate Resources for Key Impact Areas

Track & Communicate Progress
Case Study – Millicom/Tigo

**Millicom implements the Child Rights Impact Assessment (CRIA) tool**

**Developing an Industry-Specific Child Rights Assessment Tool**

- **Goals:** developing a tool that focuses on material issues and can apply self-assessment in-country

- **2012:** Developed pilot tool ‘CRBP checklist’ and conducted in DRC 2012

- **2015:** Pilot ‘industry’ (MO-CRIA) tool in Tanzania and Rwanda

- **2016:** UNICEF industry version launched for consultation

**Columbia Pilot**

- First assessment with consultation version in Colombia, Feb 2016
  - Key market, with 30% of overall Millicom workforce
  - More advanced legislation in child rights protection

- Interviews conducted with over 20 colleagues across 10+ departments

- Assessment coordinated by global CR team
Case Study – Millicom/Tigo

Millicom CRiA key learning

Business area owner experience

• First reaction: “How is child right’s relevant to my area?”

• With guidance and right prompting questions, great opportunity to brainstorm and identify high impact areas

Global CR team practitioner experience

• Tool/Guidance provides examples of good practice

• Encourages thinking beyond ‘child labour’

Application relies on industry and CR experience of the assessor/coordinator

• Global vs local. Local inputs from knowledgeable stakeholders provide local context

Application relies on industry and CR experience of the assessor/coordinator

• Global vs local. Local inputs from knowledgeable stakeholders provide local context
Exercise: Conducting a MO-CRiA Self Assessment
Exercise: Test driving the MO-CRIIA assessment

Understanding the guidance and the tool

• Split into teams of 2 or 3
• Select a company from the team
• You need access to a laptop/the xls MO-CRIIA tool and pdf guidance
  – Ideally one person has xls open and one has the pdf guidance open (use the tables at the back of the guidance)
• Each team is assigned one or two sections (“tab”) of the tool to focus on (e.g. CSR/Sustainability and Compliance, Human Resources, Procurement)
• Teams complete section as far as possible for the company in the assigned sections

• You have 20 minutes to assess your assigned section(s)
• And then 15 minutes for group discussion; feeding back on what you think of the tool and how you could use it at your organization.
• What would you need to successfully complete the tool?