Module 4: Child Right’s Due Diligence
Targeting Mobile Operators
Learning objective and module outline

*Understanding how a mobile operator can use and get value from the Mobile Operators Child Rights Impact Assessment (MOCRIA) and the Child Online Safety Assessment (COSA) tools*

- Child rights and mobile operators. Understanding the context
- Child rights impacts across a typical mobile operators value chain
- Workplace, Marketplace, Community and Supply Chain impacts, risks and responses
- Introduction to the MOCRIA tool
- Case study - child online safety as part of broader child rights impact assessment - Millicom/Tigo
- Introduction to the COSA tool
- Criteria in the COSA tool that are most relevant to Mobile Operators
- The GSMA and other resources and steps you can take
Child rights and mobile operators - Understanding the context

Considerations for Mobile operators in context of Children and Internet

- Mobile operators are a fundamental force in the promotion and protection of child rights
  - Mobile phone service now available to 90% of global population \(^1\) and Mobile Internet penetration is forecast to reach 71% by 2019 \(^1\)
  - An average of 69 per cent of children use a mobile phone and two in three children who use a mobile phone can access internet via a smartphone \(^2\)
  - Mobile operators unaware of % of child use of services due to contracts being with adults
  - 58% of US tweens said they know how to hide what they do online from their parents \(^3\)

Developing world situation
- Limited research and data available regarding use, risks and solutions and role of stakeholders
- Laws and policy may be absent or not enforced
- There is a clear need for data and information and education for children, parents and teachers on
  - Differences between illegal activity such as sharing CSAM and risky online behaviours like cyberbullying, disclosing personal information
  - Approaches to digital literacy and online safety
  - Use of ICT to promote digital and broader child rights
How are children impacted by Mobile Operators?

Example value chain of the mobile technology sector

Key: Black writing shows business activities, Purple writing shows relevant roles, ◼️ shows potential impact and intervention points
Key ways businesses can promote children’s rights in the workplace

**Impact Areas**
- Family-friendly workplaces
- Preventing child labor
- Preventing company facilities and equipment being used for child right violations
- Respecting rights of young workers and caregivers
- Ensuring protection and safety of children at workplace and across network operations

**Risks**
- Decreased brand reputation
- Child not in education, risks of injury, to health and of exposure to immoral activities
- Problems recruiting and retaining skilled workforce, including mothers and carers
- Fines and loss of license to operate
- Inefficient and/or underqualified employees.
- Costs to train new staff, down time due to accidents

**Response**
- Establish living wage, adequate sick leave
- Enable young workers to continue education
- Worker age-verification
- Health and safety
- Family-friendly work environment, e.g. childcare facilities
- Prevent discrimination including during pregnancy and maternity
- Codes of conduct, training and contingency planning

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**Workplace**
Ensuring healthy, positive and appropriate products and marketing for children

### Impact Areas

- Ensure products and services promote and protect child rights in use
- Ensure responsible marketing and advertising which does not infringe on child rights
- Use of communication to support and advance children’s rights

### Risks

- Violating rights of children, including cyberbullying, child sexual exploitation
- Child safeguards are not adequately applied across product value chain
- Missed opportunity to design child safety features / protection of child rights into products
- Missed opportunity for innovation
- Children misinterpret promotional messaging / make ill-informed decisions

### Response

- Follow national/international laws/regulations
- Reduce health/safety dangers from unintended use of products
- Assess risks due to unintended use of products/services
- Ensure consent of parents and children for purchases and use
- Establish responsible marketing/advertising policy
- Promote healthy behaviours and products
- Accessible complaint mechanism
Community

Managing community impacts of operations, networks, products and services

Impact Areas

- Respecting children’s rights in regards to environment and land acquisition and use
- Respecting children’s rights in security arrangements
- Protect children affected by emergencies
- Reinforcing government and community child rights initiatives

Risks

- Health/safety impacts on children as a result of product and network (e.g. emissions, water toxicity)
- Poor relations, lack of trust with community members / Loss of license to operate
- Products/services facilitating exploitation of children in the community
- Child adversely impacted by emergencies or in security arrangements

Response

- Monitor environmental impacts of operations
- Select and train security personal on basis of child rights
- Consult community regarding interaction with children
- Ensure any relocation upholds rights of families / children
- Community / regional level child rights impact assessments
- Collaborate with community stakeholders to develop educational campaigns on responsible ICT use
Ensuring children rights are protected throughout a company’s supply chain

**Impact Areas**
- Ensure workplace rights are upheld by suppliers and subcontractors
- Eliminate any potential sources of child labour or other exploitation of children by suppliers/contractors
- Ensure suppliers products are safe and meet international health and safety standards

**Risks**
- Impacts to children within supply chain (e.g. child labor, exploitation)
- Misalignment of corporate policies and those of suppliers leading to child rights violations
- Lack of knowledge by suppliers on how to identify/mitigate child rights impacts/risks
- Suppliers operating in conflict zones
- E-waste leading to hazards in collection and processing

**Response**
- Introduce supplier code of conduct
- Build children’s rights into selection, review and training of suppliers
- Avoid making demands of suppliers that could result in child labor
- Monitor/audit suppliers regularly to ensure alignment with corporate policies
- Identify high risk suppliers and work with them to identify/improve any child rights impacts
- Introduce complaint mechanism
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, MOCRiA 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:
Case Study – Millicom/Tigo

Millicom and Child Rights Impact Assessments in Africa and Latin America

Mobile Operator CRIA

- Focuses on material issues
- Self-assessment in-country
- Piloted in DRC 2012, Tanzania and Rwanda in 2015
- UNICEF industry version launched for consultation in January 2016
- First assessment with consultation version in Colombia, Feb 2016
  - Key market, with 30% of overall workforce
  - More advanced legislation in child rights protection
- Interviews conducted with over 20 colleagues across 10+ departments
- Assessment coordinated by global CR team

Key Learnings

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
GSMA and industry engagement in Children’s rights

There are extensive networks and resources for mobile operators in relation to child rights

• The GSMA mobile alliance
  – Provides technical measures, co-operation and information sharing
  – Seeks to create significant barriers to the misuse of mobile networks and services for hosting, accessing, or profiting from child sexual abuse materials

• The GSMA European Framework for Safer Mobile Use by Younger Teenagers and Children recommends
  – Working with law enforcement agencies, national authorities and INHOPE
  – Classification of commercial content
  – Access control mechanisms
  – Education and awareness-raising

• The GSMA also
  – Produces issue specific guidelines and toolkits, e.g. on Notice and Take Down procedures, Education, Responsible content
  – Collaborates with UNICEF to promote industry guidelines to safeguard children online in Latin America and the Caribbean

• The EU CEO coalition represents many key ICT industry players who have committed to online safety
Introduction to the Child Online Safety Assessment Tool

The tool consists of a guidance document and an xls assessment mechanism structured by business departments

- The PDF companion guide
- Used in the assessment preparation, completion and for action planning
- The Excel-based questionnaire
- Designed to make it easy to:
  - Assess your performance against the criteria
  - Store the results and related evidence generated during the self-assessment
  - Complete a risk assessment
  - Create a prioritized action plan assigned to individuals

Example screenshot below:
Criteria in the COSA xls tool most relevant to Mobile Operators

Most criteria in the COSA tool are directly relevant to Mobile Operators. There are some criteria where specific addition resources are available.

- Policies and procedures for handling, filtering and blocking CSAM
- Notice and takedown procedures
- CSAM reporting mechanism and access to hotlines
- Processes to ensure non-complicity in restrictions on legitimate activities of mobile operators such as freedom of expression
- Prevention of misuse of payment services for illegal purposes
The structure and scope of the COSA xls tool criteria

Most criteria in the COSA tool are directly relevant to Mobile Operators. There are some criteria where specific addition resources are available.

- Aligning any corporate social responsibility programs so they support national development goals, education and access to ICT’s
  - See for example GSMA programs: ‘mEducation’, ‘Mobile for Development’, ‘mWomen’
The structure and scope of the COSA xls tool criteria

Most criteria in the COSA tool are directly relevant to Mobile Operators. There are some criteria where specific addition resources are available.

- Ensuring that customers/parents and users/children understand safe online behaviours and controls.
- Promoting helplines in local, age appropriate language.
The structure and scope of the COSA xls tool criteria

Most criteria in the COSA tool are directly relevant to Mobile Operators. There are some criteria where specific additional resources are available.

- Providing transparent and clear customer information about the nature of the services that are offered, age restrictions and pricing
- Complying with any legislation or international best practice in relation to collecting, using or disclosing personal identifiable or location information
Engagement and collaboration is key

- Promoting and protecting children’s rights is a non-competitive issue.
- Industry needs to work together and in partnership with other stakeholders such as NGO’s, Academics and government agencies to share research, impact assessment outcomes, challenges and to develop solutions.