MO-CRIA:
Child Rights Impact Self-Assessment Tool for Mobile Operators

GUIDE TO SECOND EDITION

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Foreword

Mobile technology has become an integral part of children's daily realities all around the world – offering access to a world of information and opportunities to connect, learn, play, and much more. With mobile accounting for most broadband connections in low- and middle-income countries, the importance of the role played by mobile operators in this increasingly digital world cannot be overstated.

Indeed, the onset of the COVID-19 pandemic and the resulting surges in demand for mobile data around the world have only served to further highlight the many ways in which meaningful access to mobile technologies has become an indispensable lifeline for millions around the world, including children. The contributions that mobile technology can make to enhancing children's lives across different Sustainable Development Goal areas, from quality education to gender equality, have also long been recognized.

This second edition of the Child Rights Impact Self-Assessment Tool for Mobile Operators (MO-CRIA) offers a simple and yet comprehensive framework for mobile operators seeking to build a deeper understanding of child rights challenges, opportunities, and impacts related to their business. The 2021 edition builds on the experiences of companies which implemented the original tool.

When considering the impact of mobile operators on children's rights, it is a natural initial reaction to focus in on the digital environment itself. Of course, this is a vital and necessary element of impact assessment— and this revised tool offers greater detail on this topic, reflecting the increased importance of considering children's rights online.

But child rights impacts are also found in how companies manage facilities and assets, as well as how they develop, produce, market, and deliver products and services – whether this is done directly or through business partners and suppliers. Like all businesses, mobile operators have a responsibility to respect children's rights throughout their operations and through their relationships with employees, business partners, and other key stakeholders. This version of the MO-CRIA self-assessment tool has been updated with guidance and considerations across these different arenas.

Calls for companies to carry out human rights due diligence of their operations and wider value chain have and will continue to intensify. In light of this, the MO-CRIA self-assessment tool is a resource to support and facilitate further action.

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Abbreviations

CRBP	Children's Rights and Business Principles
CRC	Convention on the Rights of the Child
CRIA	child rights impact assessment
CSAM	child sexual abuse material
DRC	the Democratic Republic of the Congo
DRR	disaster risk reductio
EMF	electromagnetic field
GRI	Global Reporting Initiative
GSMA	Global System for Mobile Communications Association
HRIA	human rights impact assessments
ICMEC	International Centre for Missing & Exploited Children
ICNIRP	International Commission on Non-Ionizing Radiation Protection
ICT	information and communication technology

Glossary

Best interests of the child	One of the four core principles in the United Nations Convention on the Rights of the Child (CRC), this applies to all actions and decisions concerning children. It calls for active measures to respect their rights and promote their survival, growth and well-being as children, as well as measures to support and assist parents and others who have day-to-day responsibility for realizing children's rights.[1]
Child	Under CRC article 1, "a child means every human being below the age of 18 years unless, under the law applicable to the child, majority is attained earlier."
Child labour	Any work that deprives children of their childhood, their potential and dignity, and that is harmful to physical and mental development. It is defined by the ILO Minimum Age Convention, 1973 (No. 138), and the Worst Forms of Child Labour Convention, 1999 (No. 182), and by the United Nations Convention on the Rights of the Child.[2]
Child sexual exploitation and abuse	Describes all forms of sexual exploitation and sexual abuse, e.g. "(a) the inducement or coercion of a child to engage in any unlawful sexual activity; (b) the exploitative use of children in prostitution or other unlawful sexual practices; (c) the exploitative use of children in pornographic performances and materials", as well as a "sexual contact that usually involves force upon a person without consent". Child sexual exploitation and abuse increasingly takes place through the internet or with some connection to the online environment.[3]

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1 UNICEF, UNGC, Save the Children, 'Children's Rights and Business Principles',: <http://childrenandbusiness.org/the-principles/introduction/>
2 A more detailed definition can be found on the ILO website at 'What is child labour' <https://www.ilo.org/ipec/facts/lang--en/index.htm>
3 ITU, 'Guidelines for Industry on Child Online Protection', 2020, <www.itu.int/en/ITU-D/Cybersecurity/Pages/COP.aspx>

Child sexual abuse material (CSAM)	Although many jurisdictions still label images and videos of child sexual abuse 'child pornography' or 'indecent images of children', we refer to the issues collectively as 'child sexual abuse material' (CSAM). The term CSAM is used to refer to material that represents acts that are sexually abusive and/or exploitative to a child. This includes, but is not limited to, material recording the sexual abuse of children by adults; images of children included in sexually explicit conduct, and the sexual organs of children when the images are produced or used for primarily sexual purposes. This term more accurately describes the content. Pornography refers to a legitimate, commercialized industry and, as the Luxembourg Guidelines state, the use of the term: "may (inadvertently or not) contribute to diminishing the gravity of, trivializing, or even legitimizing what is actually sexual abuse and/or sexual exploitation of children. The term 'child pornography' risks insinuating that the acts are carried out with the consent of the child and represent legitimate sexual material".[4]
Conflict minerals	Mining of some metals and minerals used in mobile network equipment and devices has been linked to armed conflict in countries such as the Democratic Republic of the Congo, by directly or indirectly benefiting armed groups. Mining in these conflict zones has also been linked to abuses such as child and forced labour and the use of children as soldiers. 'Conflict minerals', as defined by the US legislation, currently include the metals tantalum, tin, tungsten and gold (3TG), while the OECD 'Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas' has a broader scope and covers all minerals, not only 3TG.[5]
Cyberbullying	Cyberbullying describes an intentionally aggressive act carried out repeatedly by either a group or an individual using digital technology and targeting a victim who cannot easily defend him or herself. It usually involves "using digital technology and the internet to post hurtful information about someone, purposely sharing private information, photos or videos in a hurtful way, sending threatening or insulting messages (via email, instant messaging, chat or texts), spreading rumours and false information about the victim or purposely excluding them from online communications".[6]
Grooming	Grooming/online grooming, as defined in the Luxembourg Guidelines, refers to, "the process of establishing/building a relationship with a child either in person or through the use of the Internet or other digital technologies to facilitate either online or offline sexual contact with that person". It is the criminal activity of becoming friends with a child in order to try to persuade the child to have a sexual relationship.[7]
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	Software that allows users, typically a parent, to control some or all functions of a computer or other device that can connect to the internet. Typically, such programmes can limit access to particular types or classes of websites or online services. Some also provide scope for time management, e.g. the device can be set to have access to the internet only between certain hours. More advanced versions can record all texts sent or received from a device. The programmes normally will be password protected.[8] 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 CRC. It is unlikely to be possible to remove all the risks to children that exist online. Additionally, beyond a certain point, attempting to do so could threaten children's access to the multiple benefits provided by meaningful access to the internet.
Grievance mechanisms and remediation	The term remediation refers to both the processes of providing a remedy for an adverse human rights impact and to the substantive outcomes that can counteract or make good the adverse impact. Where a business identifies that it has caused or contributed to an adverse impact on human rights, it should provide for or cooperate in their remediation through legitimate processes, including effective operational level grievance mechanisms or judicial mechanisms, as appropriate. Operational level mechanisms should be accessible to girls and boys, their families and those who represent their interests, and meet the effectiveness criteria for non-judicial grievance mechanisms set out in UNGP 31.[9]
Young worker	Not all work carried out by a child is child labour. For UNICEF, 'young workers' are those above the legal working age and under 18 years. The international minimum age for full time, non-hazardous work is 15. National standards may be higher. In accordance with International Labour Organization (ILO) Convention No. 138, countries with an insufficiently developed economy and education system may have temporarily registered a general minimum age of 14. Business has an important role to play in promoting decent youth employment and in respecting and supporting the rights of children in the workplace who have reached the general minimum age for employment.[10]

4 Ibid.
5 Dodd-Frank Act on Disclosing the Use of Conflict Minerals, Section 1502, <www.sec.gov/opa/Article/2012-2012-163htm—related-materials.html>; and the OECD 'Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas', <www.oecd.org/corporate/mne/mining.htm>
6 ITU, 'Guidelines for Industry on Child Online Protection', 2020, <www.itu.int/en/ITU-D/Cybersecurity/Pages/COP.aspx>
7 Ibid.
8 Ibid.
9 Ibid.
10 UNICEF, 'Respecting the rights of young workers', <www.unicef.org/csr/243.htm>

1. Introduction

Children[11] make up almost one third of the world's population[12] and interact with business directly and indirectly in multiple ways: for example, as consumers, as family members of employees, as members of communities affected by business operations, and as young workers.[13]

Childhood is a time when physical, social and emotional experiences and conditions have profound impact in shaping emerging physical, social and mental capacities, with lasting consequences for both individuals and society, sometimes intergenerationally. Growth in childhood is rapid and formative, and children, especially young children, require others to assist and take care of them as parents and caregivers. In all of these ways, children are different from adults.

This is recognized in the existence of a specific United Nations Convention articulating the rights of children. The Convention on the Rights of the Child, the most ratified human rights standard in the world, sets out the rights that must be realized for children to develop to their full potential. It offers a vision of the child as an individual and as a member of a family and community, with rights and responsibilities appropriate to his or her age and stage of development. By recognizing children's rights in this way, the Convention firmly sets the focus on the whole child.

The Convention recognizes the fundamental human dignity of all children and the urgency of ensuring their well-being and development. It makes clear the idea that a basic quality of life should be the right of all children, rather than a privilege enjoyed by a few. It also outlines that children need special safeguards and care.

WHAT DOES THIS MEAN FOR MOBILE OPERATORS?

As a relatively vulnerable (and often invisible and marginalized) business stakeholder group, children "can be disproportionately, severely and permanently impacted by business activities, operations and relationships".[14] Making children visible merits special consideration and attention from businesses when they consider their human rights impacts.

Mobile operators affect children through the ways they manage their facilities and assets, and how they develop, produce, market and deliver products and services – whether directly or through business partners and suppliers. They have a responsibility to respect children's rights throughout their operations and through their relationships with business partners and key stakeholders. The Children's Rights and Business Principles (CRBPs) provide explicit guidance on what it means for business to respect and support children's rights (see box below).

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11 United Nations Convention on the Rights of the Child defines children as everyone under the age of 18; <www.ohchr.org/en/professionalinterest/pages/crc.aspx>
12 United Nations Children's Fund, 'The State of the World's Children 2019 Statistical Tables', October 2019, <https://data.unicef.org/resources/dataset/sowc-2019-statistical-tables/>, accessed 13 April 2021.
13 International Labour Organization Convention No. 138 requires national governments to set the minimum legal age of children allowed to enter the workforce, seeking to ensure that work does not interfere with compulsory schooling. It also provides strict age-related guidelines on the nature of work that a child can lawfully undertake.
14 Professor John Ruggie, former United Nations Special Representative of the Secretary-General for Business and Human Rights; <www.unicef.org/csr/theprinciples.html>

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. The Guiding Principles represent a milestone in setting the standards for companies conducting human rights due diligence, including impact assessments. Since their launch, corporate consideration of human rights and children as distinct rights holders and stakeholders has steadily grown.

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, UNICEF, the United Nations Global Compact, and Save the Children released the Children's Rights and Business Principles (CRBPs) 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 CRBPs 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.

9. Help protect children affected by emergencies.

10. Reinforce community and government efforts to protect and fulfil children's rights.

The CRBPs 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.

To support mobile operators in understanding and evaluating their child rights impacts, UNICEF and the mobile operator Millicom, with support from Den Norske Veritas, teamed up in 2014 to develop the first edition of the 'mobile operator child rights impact self-assessment' or 'MO-CRIA' tool.

The MO-CRIA self-assessment tool is primarily designed to offer an easy-to-use and comprehensive self-assessment framework for mobile operators to:

■ more fully understand the challenges, opportunities and child rights impacts related to their industry and their operations;

■ analyse and manage their potential and actual impacts on child rights, and build plans to enhance child rights management within the organization as well as mitigate potential negative impacts;

■ uncover strengths and weaknesses in managing child rights within the company's current human rights framework.

This guide to the MO-CRIA self-assessment tool is meant to support the 'assessor', or the person(s) coordinating and leading the self-assessment process. It outlines the background, purposes and functions of MO-CRIA self-assessment tool; provides practical advice on implementing the tool; further information on each issue

to help assess the company's current performance; and supporting material to explain child rights implications to colleagues participating in the assessment.

The MO-CRIA tool is based on the ten principles outlined in the CRBPs covering core workplace, marketplace and community issues, some of which are specific to the industry, while others are shared with most businesses and other sectors. MO-CRIA covers both risks and adverse impacts on child rights, but also opportunities mobile operators have to support the realization of child rights. The tool was updated in 2021 to reflect increased focus on child rights impacts in the digital world and to further improve usability, based on feedback from companies who had applied the tool to date.

Since the MO-CRIA self-assessment tool was first launched, the discipline and practice of business and human rights has evolved and matured. Human rights and child rights impact assessments are an important element of a company's overall human rights due diligence, which aims to understand systemic risks to human rights and child rights relating to the company's operations. When gauging their risks, the UNGPs call for companies to draw from "internal or independent external human rights expertise" and to engage in "meaningful consultation with potentially affected groups".[15]

Indeed, whilst the MO-CRIA has been developed through extensive stakeholder consultation and involvement of child rights experts at UNICEF, it remains a self-assessment tool. As such, it should be complemented with stakeholder engagement and input that help the company to understand the actual and potential impacts to children. Similarly, if a company's internal expertise on human rights is limited, they may wish to consider involving independent external experts to carry out the assessment.

Human Rights and Child Rights Impact Assessments

Human rights impact assessments (HRIAs), including impact assessments focused on child rights (a 'child rights impact assessment' or CRIA), are important due diligence activities which form part of a company's responsibility to respect human rights, as defined in the UNGPs.

The B-Tech Project, led by UN Human Rights, outlines: "There are benefits to a company conducting or commissioning HRIAs as one tool within a wider due diligence toolkit. They can act as an internal lightening rod to focus business leaders on specific end-use human rights risks. An HRIA process can also build the competence of company practitioners to identify, and communicate about, human rights risks in ways that are consistent with the UNGPs. This is especially the case when they are led or supported by credible experts with human rights expertise. And HRIAs can produce outputs – most often in the form of reports – that companies can use to guide internal decision-making about how they will address the human rights risks identified."

The MO-CRIA self-assessment tool can be used as an important input to a more comprehensive CRIA or HRIA. However, it should not be the only mechanism through which a company seeks to understand and manage its child and overall human rights risks but should be complemented by on-going engagement and learning from human rights experts and affected stakeholders. For further guidance, consider the 10 key criteria for conducting human rights impact assessments compiled by the Danish Institute for Human Rights (available here).

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15 Article 18, UN Guiding Principles on Business and Human Rights (2011), <https://www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf>

Grievance Mechanisms and Access to Remedy

The third pillar of the UNGPs sets out the expectations for states and companies to provide access to remediation for those whose human rights may have been adversely affected by a company's operations. This includes the company putting in place mechanisms (also referred to as 'grievance mechanisms') and collaborating with established mechanisms, such as judicial or non-judicial processes, through which grievances concerning business-related human rights abuse can be raised and remedy can be sought.

Several sections of the MO-CRIA indirectly touch on the issue of effective access to remediation, as achieving this requires action from different functions within the company. These sections include public policy commitments that include respect for child rights (see section 1.1.1); stakeholder and community engagement involving children (see section 1.3.1); collaboration with law enforcement (see section 2.5); and the support of child hotlines and helplines (see sections 2.6 and 2.9).

There are also dedicated sections around 'operational-level grievance mechanisms' (those managed by the company or a group of companies). These mechanisms can be a means of the company addressing grievances directly and early by itself. A company's own employees as well as external stakeholders should be able to address their concerns at an early stage and seek remediation of any harm caused. Grievance mechanisms are relevant across many issues – from harassment in the workplace to suspected child labour within the company's supply chain.[16] Examples of grievance mechanisms include anonymous whistle-blowing lines and customer service channels.

Beyond providing access to grievance mechanisms, it is important to ensure that the mechanisms serve their purpose and are effective in practice. The UNGPs include a set of effectiveness criteria (UNGP 31) to help define what this entails.[17] Important things to consider are: that grievance mechanisms are both legitimate and accessible; that those receiving reports have the competence to handle them or know where to escalate them; that the investigation processes are fair and protect the privacy of all involved, and that the outcomes and remedies adequately address any harms identified. See more about child-sensitive grievance mechanisms in UNICEF's discussion paper: 'Operational-level Grievance Mechanisms Fit for Children'.

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16 See sections 1.2; 4.3; 5.6; 5.7; 6.4 and 7.4.
17 See details in Effectiveness Criteria set out in the 31st Principle of the UNGP, <www.ohchr.org/Documents/Publications/ GuidingPrinciplesBusinessHR_EN.pdf>

2. How To Use The MO-CRIA Self-Assessment Tool

The MO-CRIA self-assessment tool is an Excel-based questionnaire that is designed to make it easy to capture answers and related evidence generated during the self-assessment in one place. The tool also aggregates answers into a results overview, providing companies with a simple visual representation of strengths and weaknesses.

> **CLICK HERE TO ACCESS**
> **MO-CRIA SELF-ASSESSMENT EXCEL TOOL**

UNDERSTANDING MO-CRIA FORMAT AND STRUCTURE

The MO-CRIA questionnaire features seven primary self-assessment areas:

1. Corporate Responsibility/Sustainability and Compliance

2. Children and the Digital Environment

3. Human Resources

4. Products, Sales and Marketing

5. Procurement

6. Network Operations

7. Security

These seven areas should broadly correspond to functions or teams within the company (see '*Identifying colleagues to involve in the assessment*' below). While some thematic areas included in the tool cut across different functions, this structure is intended to facilitate the process of collecting inputs from different teams and colleagues.

Format and structure: The MO-CRIA self-assessment tool consists of seven functional level worksheets, nine columns, and clearly marked assessment areas for each topic. The figure below shows an Excel-page snapshot, highlighting basic instructions:

FIGURE 1: Layout of the MO-CRIA Self-Assessment Excel tool

Further explanation of the columns of the MO-CRIA self-assessment tool spreadsheet is provided below.

Column 1: Assessment area. Broad groups of related questions are marked by a light-blue heading, followed by the specific questions to be answered.

Column 2: Baseline expectation. This refers to the minimum standard to ensure that the item is addressed. It is possible that local laws and regulations already impose similar or even more stringent requirements on the company. In these cases, the stricter requirements should always prevail. This guide provides further information and background on each baseline expectation to support in the assessment process.

Column 3: Yes, No, N/A. Consider the statement for the 'Baseline' expectation as well as the guidance relating to it in this Guide. Does your company meet the baseline expectation? Does the company have all the expectations outlined in place? Choose 'Yes' or 'No' accordingly by clicking on the bottom-right corner of the cell to reveal the drop-down menu. The expectations call for companies to have policies, processes and activities in place that relate specifically to children. If the company has in place policies and processes relating to human rights in general, but children are not specifically considered, the company should score 'No'.

If the item does not apply to your company, choose 'N/A' (use the 'Notes on status' column to record why it does not apply to the company).

Column 4: Further action. This refers to activities that go beyond the baseline expectation and represent good practice beyond minimum, basic expectations. Consider the statement in the 'Further action' column as well as the guidance provided in this document. Does the company have most or all of the expectations outlined here in place? Choose 'Yes' or 'No' accordingly by clicking on the bottom-right corner of the cell to reveal the drop-down menu.

Column 5: Yes, No, N/A. Record the response by clicking on the bottom-right corner of the cell to reveal the drop-down menu. Choose 'Yes' if the 'Further action' requirement is met or 'No' if not. If the item does not apply to your company, choose 'N/A' (use the 'Notes on status' column to record why it is not applicable).

Please note: The tool includes automatic formatting to help highlight 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 be highlighted in green.

FIGURE 2: Sample Automatic Color Coding of Tool Rows

Assessment area		Baseline expectation	Yes, No, N/A	Further action	Yes, No, N/A
4.1 Products and services					
4.1.1	Development and promotion of products and services	Policies and procedures are in place to assess, review, and monitor products, applications, games, content, and services provided and promoted to customers to make sure they are appropriate and safeguard children's mental, moral, and physical health and development.	Yes	When the company works with third parties to develop products and services, it ensures that it communicates, and requires third parties to align to, its policies to assess, review and monitor products and services to make sure they are appropriate and safeguard children's mental, moral, and physical health and development.	Yes
4.1.2	Data protection	The company carries out privacy impact assessments and sets clear standards for privacy and the collection and storage of personal data about or from children as a result. Collection of data from children is not permitted without the consent of parents or caregivers as defined in local law.	Yes	The company requires all relevant business partners and suppliers to have policies and processes in place to respect children's right to privacy and data protection that align with legal requirements and the company's policies, whichever are highest.	No
4.1.3	Pricing	The company provides transparent, clear and age-appropriate information about the costs of services, including add-on services. Services are not sold to underage customers, as defined by local law.	No	If the company provides any SMS or other mobile payment services directly to customers or to business clients, there are safeguards in place to avoid unintentional purchases by children and/or refund mechanisms are in place for when these occur.	No
4.2 Responsible sales and marketing					
4.2.1	Marketing and advertising policy	The company adheres to relevant local laws and regulations on advertising to children in its advertising and marketing activities and has a global responsible marketing, sponsorship, and advertising policy or code of conduct in place that includes specific considerations	N/A	The company cooperates with and engages in voluntary marketing initiatives that take account of potential child-rights impacts related to product advertising.	N/A

Column 6: Notes on status. Use this column to record what the company is currently doing in each area, for example, developing a code of conduct including child rights/ aligned to the CRBPs; conducting a global risk assessment including issues related to child rights. It is also valuable to record who has provided information for future reference.

Column 7: Evidence. Record the names of the documents and records referred to in the 'Notes on status' section as evidence for the assessment here. Evidence can be internally or externally available documentation, for example copies of policies, standard operating procedures, internal audits, results of risk and impact assessments, supplier audits, sustainability reporting or references to publicly available communications materials. 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 the number of the relevant tool section so current and future users can easily locate internet 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.

[Optional] Column 8: Summary of gaps. This column can be used to highlight gaps between the company's current status and the expectations outlined in this guide for 'Baseline' and 'Further Action'. This column has been added for convenience of having all the information in one document.

[Optional] Column 9: Priority (High, Medium, Low). Setting a priority level for each item based on the level of risk created for children will help identify top areas for action following the assessment. This can also provide an opportunity to integrate the findings within existing human rights risk assessment and management processes. To complete this column, consider the likelihood and potential severity of the impacts on children. This includes the scale of the impact (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, exposure to sexual/physical violence, or possible injury/death). If you choose not to include this step, you can hide the column in the tool.

In many cases, companies do not have a deep insight into risks to children. Consequently, partnering or working with stakeholders who are experts in child rights issues relevant to the industry (e.g. non-governmental organizations (NGOs) or academia) is highly recommended. See 'stakeholder engagement' below for more.

VISUAL DATA OUTPUTS

As the worksheets are filled out, the MO-CRIA excel tool automatically generates charts that summarize the results, providing a visual overview of the company's strengths and weaknesses with respect to children's rights.

Click on the 'Visual outputs' tab to view a series of four charts displaying the results of the assessment. This includes graphs on performance across the six key functions, broken down by 'baseline' and 'further action' criteria (*see example below*).

FIGURE 3: Sample 'Summary Of Results' Output From MO-CRIA Self-Assessment Excel Tool

Use the 'Data output' tab to view the raw data behind each chart in the visual outputs tab (*see example below*).

FIGURE 4: Sample 'Summary Of Findings' Output From MO-CRIA Self-Assessment Excel Tool

3. Carrying Out The Self-Assessment

Completing the MO-CRIA self-assessment questionnaire involves consulting different teams and functions within the company as well as conducting desk-based research. Mobile operators who have used the MO-CRIA self-assessment tool have designated an internal team or focal point to manage the overall coordination and collection of information, or have commissioned external expert consultants for this task. This may depend on the level of resources and expertise at hand.

Most mobile operators have carried out the MO-CRIA self-assessment over a period of one to two months. However, because the self-assessment tool is divided into seven sections, it is also possible to focus on one section at a time and extend the assessment over a longer period. Because MO-CRIA is a self-assessment tool, it does not itself require consultations with affected stakeholders and independent external experts – although some operators have also integrated MO-CRIA questions into their existing HRIAs. Others have commissioned expert organizations to support them in carrying out the self-assessment. To increase the credibility of the MO-CRIA process, it is strongly encouraged that companies publish information about how they carried out MO-CRIA; how it was complemented by additional stakeholder consultations and input; what the assessment findings were, and what actions the company is putting in place as a result.

If the company consists of several subsidiaries, the MO-CRIA self-assessment tool can be used both at group/headquarters and country office/subsidiary levels. However, in this type of structure, some questions may be more relevant at group level and others on the ground at country level. Some companies have piloted the assessment in one operating country first and applied learnings of this initial risk assessment to subsequent assessments.

This section provides more information to help understand the practical steps that are needed to carry out the assessment and determine the right approach.

IDENTIFYING THE COLLEAGUES TO INVOLVE IN THE ASSESSMENT

The first step consists of identifying the right teams to provide answers to the questions in the tool. The seven sections of the tool should broadly correspond to functions and teams within the company. It is understood that the names of teams and the scope of their responsibility will vary between companies. The decision to divide the tool by function, rather than by child rights issue, has been taken in order to help facilitate the practical implementation of the assessment.

Many mobile operators have a presence in a number of countries where they source, market and sell their products and services. It is important that, as well as central, company-wide teams, enough regional and/ or in-country stakeholders are included in the self-assessment to represent the diversity of the company's operations and to understand how operations, products and services may impact children in particular countries and contexts. It is particularly important to include countries and regions where risks may be higher, or that are commercially important for the company.

The seven sections of MO-CRIA self-assessment tool are listed below with additional considerations relevant to identifying colleagues to involve in the assessment.

1 **Corporate Responsibility/Sustainability and Compliance**

The components of this section may cut across a number of different company functions, and may require consultation with numerous teams. Questions relate to broad policy commitments and governance regarding human rights and child rights; implementation of child rights into other corporate policies; grievance mechanisms; engagement with external stakeholders, including governments; measurement and reporting; and community engagement.

These issues would typically be addressed by teams who are in charge of the company's sustainability or corporate responsibility strategy and programs. Some companies may have dedicated human rights teams or community engagement teams who should also be consulted. The company's policies and the related compliance programs may be managed by a dedicated compliance team, by internal audit or by the team of the company secretary. Some questions may be relevant to the regulatory, public policy or corporate affairs teams.

2   Children and the Digital Environment

Questions in this section relate to fighting child sexual abuse online, child online protection policies, processes and related engagement and collaboration with external parties. Many of these topics may be managed by sustainability and corporate responsibility teams. Some questions may be relevant to the regulatory, public policy or corporate affairs teams, while some – such as relating to fighting CSAM and related law enforcement collaboration – may be relevant to security or legal teams.

If companies decide to start their assessment with this section or only focus their assessment on impacts in the digital environment, this should also include the following elements of other sections:

Section 3: Human Resources

- **3.4** Child Safeguarding

Section 4: Products, Sales and Marketing

- **4.1.2** Data protection

- **4.2.1** Marketing and advertising policy

- **4.2.2** Marketing and advertising: implementation and governance including sponsorship policy

Section 7: Security

- **7.5** Privacy and freedom of expression during emergency situations

3   Human Resources

Questions in the human resources section relate to minimum age policies; young workers and their employment; family-friendly policies; employee benefits, and child safeguarding policies, including involving travel, volunteering, and the use of company facilities.

These are all questions that would usually fall under the responsibility of human resources but some, such as use of company facilities and equipment or travel polices, could also be addressed by administrative teams, IT teams or facility management. Likewise, child labour and decent work for parents and caregivers are also particularly relevant for procurement and supply chain compliance teams.

4   Products, Sales and Marketing

Questions in this section relate broadly to marketing and advertising, including product development, impacts of new innovations and product evolution (such as artificial intelligence and 5G), and safety, pricing, customer data collection, targeted advertising, and sponsorships.

These questions can be addressed to marketing, go-to-market, product quality or safety, and commercial teams – but can perhaps also be addressed by legal departments (including privacy teams).

5   Procurement

Questions in this section relate to procurement of products and services both in terms of direct suppliers and issues further down in the supply chain, such as addressing the issue of conflict minerals, and how child rights issues are considered in responsible supply chain policies and management processes. They should be directed to procurement and supply chain teams, in particular any dedicated responsible supply chain managers or compliance resources.

6   Network Operations

Questions in this section relate to building and rolling out telecom networks, procuring and leasing land, as well as mobile masts and health. Colleagues responsible for network planning and operations, the company's compliance function (in relation to land purchase in particular), or colleagues managing any tower company relationships would be the relevant teams to consult on these questions.

7   Security

Questions in this section relate to the provision of security services at different mobile operator premises from offices to network sites; emergency preparedness and business continuity planning; and managing requests from governments relating to national security and crime prevention.

It is most likely that most of these questions can be addressed by the corporate security department, but some companies may have dedicated business continuity units. Health and safety teams may also be involved in managing these issues. Issues related to government requests are likely to involve corporate affairs or legal teams.

LAUNCHING THE MO-CRIA SELF-ASSESSMENT PROCESS

Some companies who have used the MO-CRIA self-assessment tool have launched the assessment with a joint meeting involving all the colleagues identified (*see 'Identifying colleagues to involve in the assessment' above*). This meeting can be used to explain the objectives of the assessment; what is expected of them and, importantly, as an introduction to how children's rights are relevant to the daily activities of the company and why they merit special focus within any existing sustainability work.

Particularly if internal child rights expertise is limited and the company is not using external advisors to carry out the assessment, they may consider inviting child rights experts to join this meeting, to provide an overview of children's rights and business. This can be followed by more detailed information about the assessment itself. UNICEF has produced an introductory presentation on the MO-CRIA self-assessment that can be used for this purpose.

**CLICK HERE TO ACCESS
MO-CRIA INTRODUCTION SLIDE DECK**

GATHERING INPUT FROM COLLEAGUES

Input to the tool can be collected in several ways. The company may decide to set up interviews, by phone or in person, to go over questions relevant to each team. Alternatively, different teams may fill in the section of the spreadsheet that relates to them, which can then be reviewed with the assessor.

While the seven sections of the self-assessment broadly identify the main teams to involve, there may be some areas or questions that require 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 internal expertise from across the business as required.

The company should not limit itself to direct impacts but consider the full value chain and how it may cause, contribute, or be directly linked to child rights impacts. The company should also consider where it has influence and leverage with third parties and how these manage risks, such as business partners or suppliers. For example, if a specific function or activity is outsourced, it is important to include colleagues who manage these relationships.

ADDITIONAL INPUTS TO THE ASSESSMENT

In addition to interviews with colleagues, there are other ways the assessor can collect supplementary information that will help in understanding risks to children in different business areas or geographies. This information can help to decide which colleagues to interview but also to prioritize actions that can address higher risk areas once the assessment is complete (these may encompass specific functions or countries). Importantly, these steps will bring external perspectives to the self-assessment, which add to its relevance and credibility.

UNDERSTANDING RISKS TO CHILDREN

It is valuable to build a wider understanding of child rights risks and expectations and how risks may vary by country by consulting specialized sources. This may bring to light additional information to that provided by colleagues, further understanding of actual and potential impacts on children's rights and help to surface any blind spots. Some useful resources include:

- The *Children's Rights and Business Atlas*, an interactive data-driven platform, jointly produced by UNICEF and the Global Child Forum. The Atlas attempts to put indicators to the CRBPs across 198 countries and territories, allowing companies to unpack which issues might be of specific concern in their areas of operation and industrial sector. It can serve as a starting point for including informed children's rights examinations into all due diligence frameworks.

- ILO Conventions, particularly 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 the *ILO NORMLEX database*, which can also be used to find information about whether conventions have been ratified by particular countries and the local laws that implement them. In addition to child labour, information can be found about things like maternity leave requirements, for example.

- 'Guidelines for Industry on Child Online Protection', ITU, 2020. These guidelines address issues related to protecting children in all areas and against all risks of the digital world, highlighting good practices that can be considered in the process of drafting, developing and managing company child online protection policies. They include specific guidance for companies who provide connectivity, data and hosting services. See Section 2 on 'Children and the Digital Environment' below.

- 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 collates information from trusted sources, with expert oversight, and provides interactive maps and quarterly reports on 'digital inclusion' and other information and communication technology (ICT) industry topics.

- *ICMEC's Rule of Law project*, analyses CSAM legislation in 196 countries around the world. It highlights gaps in current legislation and offers a ''menu' of concepts to be considered when drafting anti-CSAM legislation. This resource is important in understanding risk relating to legislative gaps and can support policy advocacy initiatives.

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Document review and desktop research

Companies can gather supplementary information and evidence for the assessment through document review of, for example, internal policies and procedures as well as any external assessments of the company's sustainability performance. Internal reports on sector-wide issues, international operations and country-level analysis (along with previously undertaken studies on risk, legal and regulatory trends) will offer a wealth of detail that can be applied to assessing children's rights impacts.

Stakeholder engagement

To align with current best practice, it is recommended that the MO-CRIA self-assessment tool is complemented by engagement with external experts and with affected rights-holders and their representatives. This is important both to help identify impacts and prioritize follow-up actions, and to make sure that these focus on the most salient issues. Stakeholders to engage can include experts who understand the challenges and potential solutions related to children's rights in the locations where the company operates. These can be found among international organizations; NGOs or charity project partners; suppliers; or industry associations and trade unions. Engaging with children's representatives or children

directly (with the relevant safeguards in place), can also be critical to ensure a meaningful assessment. If any direct engagement with children is planned, please see: UNICEF's *Engaging Stakeholders on Children's Rights, Part III: How to consult children directly.*

Questions which could be asked of external stakeholders may include:

■ What, in your view, are the primary child rights impacts of the mobile industry?

■ What are the current strengths and weaknesses in managing child rights (for the company specifically, and the wider industry or sector)?

■ What issues pose the biggest risk to children in this specific context?

■ Are there new, or emerging, issues relevant to the mobile industry that are currently unmanaged or difficult to manage?

■ Where could the company/industry make the biggest positive impact on child rights?

■ How can the mobile industry best address adverse impacts?

ACTING ON MO-CRIA FINDINGS

Using the MO-CRIA self-assessment tool will help companies uncover strengths and weaknesses in managing child rights within their current human rights framework and to build plans to improve in future. The outputs of the MO-CRIA excel tool will provide a comprehensive visual overview of these strengths and weaknesses. In addition, findings from desk-based research and consultations with external expert stakeholders (*see 'Stakeholder engagement' box*) will help in building a robust approach to managing child rights and to consider the company's leverage to help fill the gaps identified.

The guidance tables outlining 'Baseline' expectations and 'Further action' (*see Chapter 4*) can themselves form the foundation of action plans. For example, if the company did not meet the 'Further action' requirements for section 1.1.1 on 'Business principles, codes of conduct and policies', the bulleted list of expectations can be used as a basis for a roadmap for improvement. Whenever possible, actions should be accompanied by targets and indicators to track progress as well as timelines.

Additional steps to consider are:

- Choosing a set of 'red' issues (i.e. the gaps in current practice identified by the self-assessment) and integrating these into the company's sustainability plan.

- Communicating about the experience of implementing the MO-CRIA self-assessment and encouraging other companies to follow suit.

- Joining advocacy initiatives to drive change where the company cannot act alone.

- Making time-bound commitments and re-doing the assessment to track progress.

4. MO-CRIA Guidance Tables

The following guidance tables provide support on how to interpret the questions in each of the seven assessment areas; how to assess whether baseline and/or further action requirements are met; and how to improve performance. Each of the following tables contains:

■ Baseline expectation.

■ Guidance on baseline expectation.

■ Further action (where applicable).

■ Guidance on further action (where applicable).

Users are encouraged to reference these guidance tables before and throughout the completion of the MO-CRIA questionnaire to ensure accuracy. They may also be helpful in providing additional context and clarity to colleagues involved.

1   CORPORATE RESPONSIBILITY/SUSTAINABILITY AND COMPLIANCE

1.1 POLICIES AND IMPACT ASSESSMENT FRAMEWORKS

1.1.1 Business principles, codes of conduct and policies

Baseline expectation: Children's rights considerations are integrated into the company's business principles, codes of conduct and other policies where relevant.

Guidance: Your company's general commitment to respecting and supporting children's rights is the first step in achieving baseline expectations. Establishing and communicating this formal, high-level commitment is critical to make sure policies are followed and respected and that the organization can be held accountable for living up to them.

At a minimum, the company code of conduct or an appropriate high-level company-wide policy (for example a human rights policy) should include a commitment to respecting children's rights. In addition, the company's supplier requirements should also make reference to specific child rights issues.

- Global, company-wide policies are approved by the highest governance body of the company, such as the executive committee or the board of directors.
- The company has made public its commitment to children's rights, e.g. by publishing relevant policies on the company external website, where these can be easily accessible by business partners and suppliers.
- The company makes its policy commitments to children's rights easily accessible to all staff, in all regions, e.g. via the company's intranet or other policy repository and communicated in a way that ensures all internal staff understand the content and implications of the commitment. These resources should also be available to internal and external stakeholders.

Further action: The codes and policies make specific reference to recognized international child rights standards (e.g. CRBPs, the CRC, or relevant ILO Conventions). Specific rights are addressed in additional, dedicated policies as necessary. There are plans and processes in place to implement these policies through communication, training, and controls, and to measure the effectiveness of these implementation efforts.

Guidance: Risk and impact assessments (see section 1.1.2 below) will help companies understand the relevant child rights considerations for different parts of the business and for different internal functions. Results of these assessments should be included in policies and codes of conduct (e.g. child rights considerations should appear in ethics, HR, health and safety, privacy or marketing policies). Consider whether some areas merit new, dedicated policies. Each policy should be accompanied by an implementation plan. Seek expert, external support where possible to review policies and implementation plans.

- Policies are approved by senior management and specify a policy owner and, if relevant, the team responsible for implementing it.
- The company carries out regular (and in some cases mandatory) training on children's rights and related policies for relevant employees. Completion of this training is tracked to ensure awareness of the policies.
- The company considers how implementation goals can be tied to leadership incentives, such as performance management goals.
- Controls are designed that allow the company to carry out checks to make sure the policies are being followed. This can be done on a regular (e.g. annual) basis together with compliance or internal audit functions.
- The company has in place a set of targets and metrics to measure the successful implementation of these policies (such as training completion statistics, results of controls).
- The company reports these metrics to a designated senior management representative and, whenever possible, includes them in its external reporting.
- The company allocates appropriate resources to ensure effective policy implementation – including resources to address gaps and non-compliance.

1.1.2 Integrating children's rights into risk and impact assessments

Baseline expectation: The company conducts human rights or social impact assessments and risk assessments at corporate/global level that include child rights considerations.

Guidance: For many companies, implementing the UNGPs includes regular mapping of actual and potential human rights impacts. These can relate to whole operations, specific business lines or countries, or they can be carried out as part of product development, mergers and acquisitions, or at new market entry. They can also focus on specific rights, such as privacy considerations.

- The company conducts corporate/global-level impact and/or risk assessments which include specific child rights considerations, or the company carries out a dedicated, separate child rights risk or impact assessment.

Further action: The company has completed impact and risk assessments, or has tools in place to do so, relating to children's rights at country level (including in its supply chain and with business partners) as part of (new) product or service development/launch/deployment, in mergers and acquisitions, and relating to new and existing business partnerships.

Guidance: It is widely recognized that proactive risk analysis and mapping, human rights impact assessments, and consultations with internal and external stakeholders can be vital tools for evaluating and mitigating child rights and human rights risks (whether they arise from the country context, local site situation, product features and use cases, or the legal and human rights context where products/services are produced or used).

- The company identifies how mobile products and services could be misused to harm children and develops ways to block abusive usage, prior to approval, release, and distribution.
- The company seeks to understand how products are being used and whether there are any unintended impacts and consequences to children that were not anticipated.
- The company has formally integrated the assessment of child rights impacts, opportunities, and risks into the company's innovation and product/service development process (e.g. by providing guidance on types of impacts, where in the development process the assessment should occur, responsible parties, etc.). As part of this, before product release and distribution, this assessment is reviewed by a senior level employee who can verify that child rights impacts, opportunities, and risks were accurately assessed. If internal expertise is limited, the company is involving external expertise for such reviews.
- In situations of new market entry or large mergers and acquisitions, the company integrates the assessment of child rights impacts, opportunities, and risks into its due diligence.
- The company identifies child rights risks related to business partner practices, including in the supply chain and by service providers, as part of its overall human rights/child rights risk assessment processes.

1.1.3 Governance, accountability and resources

Baseline expectation: Senior management accountability for child rights is defined and adequate human resources and budgets are allocated to make sure that policies and actions in response to child rights risk and impact assessments are coordinated and implemented effectively across the company – including impacts in the supply chain.

Guidance: To appropriately prioritize risks and resources to manage child rights risks, the accountability and final responsibility for addressing children's rights is designated to senior managers or executives who can allocate a budget and resources to put policies into action and address the findings of risk and impact assessments.

Further action: Based on risk and impact 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 can be demonstrated in several ways:

- A focal point to champion children's rights is assigned within the business, and cross-functional groups established to implement related activities.
- Relevant job descriptions include responsibility for specific child rights issues.
- The company provides training and incentives for staff to deliver on the company's child rights objectives.
- Grievance mechanisms exist that allow reporting of child rights issues by employees and external stakeholders and these are communicated across the whole company (see section 1.2 below).
- The company takes a proactive approach to ensure respect for and promote child rights within the activities of business partners, including in the supply chain.

1.1.4 External reporting and transparency

Baseline expectation: The company publishes information about its policy commitments, its material child rights issues, and explains its overall approach, programs, and objectives relating to child rights on its communications channels or as part of its annual sustainability reporting.

Guidance: Transparency is key to mitigating negative child rights impacts and promoting positive impacts.

- The company provides a transparent overview of the way it manages the potential and actual child rights impacts of its activities (both negative and positive), including targets and objectives. This is linked to publicly available policies and measurements whenever possible.
- For any incidents or allegations involving child rights violations and issues, the company reports about the cases, the company response and the outcomes as transparently as possible.
- Care is taken to protect children's identity, privacy, and safety throughout reporting and tracking procedures. This includes the use of any photos of children in communications, where parental consent should be sought. While reporting needs to be transparent, it should not pose risks to rights holders, staff or legitimate business confidentiality.

Further action: 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: Measurement and reporting on child rights issues should follow the risks and impacts that have been identified. The objective is to include enough information to enable other parties to evaluate the company's management of risks and the efforts it is making to implement its policies.

- Company reporting uses consistent definitions to make sure data can be aggregated at group level, if relevant.
- The company consults outside resources when setting child rights objectives and performance indicators for the company. Guidance on incorporating child rights actions and results into annual sustainability reporting is available through UNICEF's tool on *Children's Rights in Sustainability Reporting*. 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 'Communication on Progress' public disclosure commitment, as well as providing guidance on child rights-specific reporting beyond these frameworks.
- The company is reporting child rights related KPIs. Examples can include: Percentage of employees trained in child rights-related policies; number of child rights impact assessments completed; number of business partners and suppliers engaged on child rights concerns; as well as outcomes and impacts of dedicated child rights programs, such as the number of children actively engaging with online safety initiatives.
- The company has set targets for performance whenever possible and reports on progress on a regular (e.g. annual) basis, for example, as part of its sustainability reporting.

1.2 GRIEVANCE MECHANISMS AND ACCESS TO REMEDY

1.2.1 Remediation

Baseline expectation: Where a business identifies that it has caused or contributed to an adverse impact on human rights, it should provide for, or cooperate in, its remediation. The company has established remediation processes that include specific steps to be taken if such impacts are identified.

Guidance: Companies should define on a general basis what remedial actions they are prepared to support in cases where impacts on child rights occur in their operations, and make them available before any cases arise, whenever possible.

- The company has identified remediation plans for cases where it has caused or contributed to adverse impacts on child rights, including cases where these may take place in the company's supply chain.

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: In cases where the company will not have the possibility to directly provide remedy, for example. in cases where its products and services have been misused by third parties, companies should still support and cooperate with mechanisms that can provide remedy and support to victims, including through cooperation with law enforcement, where appropriate.

- The company supports the work of child hotlines and helplines or child rights organizations. (For guidance on child sexual abuse materials and related remedies see section 2 below).

1.2.2 Grievance mechanisms

Baseline expectation: Customers and other stakeholders or claimants are provided with easily accessible grievance channels and mechanisms to report alleged grievances, including violations of child rights by the company or through the misuse of its products and services. The channels for reporting violations should be accessible to girls and boys, their families, and those who represent their interests across all territories where the business operates.

Guidance: According to UNGP 31, company grievance 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". (See Chapter 1, Introduction - 'Grievance mechanisms and access to remedy').

- The company supports and promotes channels where internal and external stakeholders can report any company related abuse or misconduct, violations of company policies and codes of conduct, such as, but not limited to, allegations of child labour, violations of decent work provisions for parents and caregivers, product health/safety impacts, or inappropriate commercial practices. These include toll-free numbers, customer service lines, or online platforms and anonymous 'whistle-blower' lines.
- Company grievance mechanisms are accessible both to children and their representatives to file complaints equitably and in their own language. Information on company grievance mechanisms is made public and accessible to all stakeholders.
- Appropriate mechanisms are in place to respond promptly and effectively to address and resolve grievances: it is clear to those receiving grievances how to address and potentially escalate these, in particular those relating to child rights. Allegations are assessed and investigated in a way that protects the rights holders, especially with regards to retaliation or reprisals.
- Effectiveness of the company grievance mechanisms is regularly analysed and monitored, for example, recording the number of reports submitted through each channel; number of incidents that were investigated; number of reports found to be valid and the outcomes of investigations, to identify and influence policies, procedures and practices that should be altered to prevent future harm.

Additional guidance on child-sensitive grievance mechanisms is available in the UNICEF discussion paper on Operational-level Grievance Mechanisms Fit for Children.

Further action: The company has reviewed and improved the effectiveness of its grievance mechanisms to consider specific needs of children at every stage of the process.

Guidance:

- Children's safety and privacy is protected throughout the process of receiving, processing, investigating, and responding to allegations and reports to make sure that their rights are protected, and that they do not experience reprisals from an alleged offender or others. Informed consent from the child or their legal representative (as appropriate) is sought before embarking on a grievance process.
- Community engagement includes feedback on the functioning of the grievance mechanisms, in accordance with the effectiveness criteria, and consultations including the views of children and/or their representatives (such as child rights organizations).
- Grievance mechanisms are communicated in child-friendly ways and through channels that children are likely to become aware of.
- Staff or external parties involved in the grievance procedures have been trained on how to handle grievances involving children – including specific guidance on ethics, escalation 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. Alternatively, the company has external child rights expertise at hand to handle any sensitive situations involving children.
- Advocacy groups can access available grievance mechanisms on behalf of children. Children should not be refused access or turned away in favour of a grievance filed by their parents and caregivers.

1.3 STAKEHOLDER ENGAGEMENT AND PARTNERSHIPS

1.3.1 Stakeholder engagement with children

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 their lives. These consultations can be used, for example, as input to policy creation and risk and impact assessments.

Guidance: Although children may not be direct customers of mobile operators, they are likely to have information, experience, and opinions that can help understand the company's potential or actual impacts on children's rights. There may be some areas where the views and experiences of children would be especially valuable, such as online safety, barriers children experience to accessing information, and the benefits children experience from using mobile technology.

- The company consults children on issues affecting them. Consultations with children are conducted with expert assistance and issues such as child safeguarding are addressed, especially if direct engagement with children is involved (in focus groups, for example).
- Consultations are made as accessible as possible, with steps taken to enable participation by children with disabilities, children from areas with restricted internet access, and children who may experience other linguistic or literacy barriers.
- The company consults with representatives of children such as parents or caregivers and child rights organizations. In some cases, this may be more appropriate than consulting with children directly, for example when planning community investments that are likely to have impacts on children.

Further guidance on working with children is provided in UNICEF's tool on *Engaging Stakeholders on Children's Rights, Part III: How to consult children directly*.

Further action: Country or site-level assessments routinely include stakeholder consultations related to children's rights and include voices of children and/or their representatives. Mobile operators can also support independent research into children's use and views of mobile technology, and how to improve its impact on their lives.

Guidance: Engagement is often beneficial and/or necessary at 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, and assessing the impacts/benefits of community investments and/or development projects located in a specific country/region.

- A country or site-level impact assessment engages country specific/local NGOs, local government, country and regional offices of international organizations, and local community leaders, to identify child rights risks and opportunities, and to understand how the company can respect and support children's rights in collaboration with business partners and government.
- The company takes part in or funds independent research into children's experiences of mobile technology and services, including on how to improve its impact on their lives.

1.3.2 Community and government engagement on issues concerning children

Baseline expectation: The company engages with national authorities such as legislators, regulators and policy makers, and child rights organizations and other relevance stakeholders (e.g. relevant United Nations agencies, organizations advocating on rights online, and other human rights actors) in the countries where it operates to address key child rights issues such as child labour and child online protection. The company advocates for clear and up-to-date laws aligned to international standards and appropriate law enforcement where needed.

Guidance: Engagement objectives and initiatives should be closely linked to core business activities and address challenges related to business operations and their impact on children. Companies can help build the capacity of legislators to understand new challenges in the digital space and, together with civil society, promote responses that respect and support children's rights. Effective and up-to-date laws will help companies to build responses and internal processes with, for example, law enforcement that are transparent and that protect sensitive data. In these engagements, the company should always act in the best interests of the child and not, for example, seek to obstruct initiatives to strengthen regulation.

- Child rights-related issues, such as decent work for parents and caregivers, child labour or child online protection (encompassing issues such as cyberbullying or supporting research to inform evidence-based decision-making), are included the company's policy engagement activities with regulators and other government stakeholders, such as ministries of education, culture or health.
- The company is engaged with child rights organizations in its countries of operation to understand the legislative gaps and challenges. Resources by International Centre for Missing and Exploited Children (ICMEC) and FOSI (Family Online Safety Institute (FOSI) can be helpful in these efforts (*see Chapter 3: Carrying out the self-assessment - 'Understanding risks to children'*).

Further action: As part of efforts to combat child labour and violence against children, the company takes an active role to address the root causes of poverty and child exploitation in the communities where it operates through multi-stakeholder initiatives aiming to address and alleviate poverty.

Guidance: Eliminating child labour and breaking cycles of poverty are a shared responsibility and efforts to address the root causes are unlikely to be effective without a multi-stakeholder approach that involves state and civil society actors as well as the private sector. The benefits that mobile operators' economic activities bring to a local community, as well as a country, also support children's rights and increasingly provide social (e.g. education, healthcare, housing) and economic benefits for children (e.g. income and job opportunities for their families).

- The company has a policy, code of conduct, standard or other document that addresses corruption and bribery, and is applied in all the company's local markets. Both internally and throughout the value chain, the company has established a zero-tolerance policy on any and all forms of bribery, corruption, extortion and embezzlement, and outlines the terms of enforcement.
- The company demonstrates that it is committed to paying all appropriate taxes, fees and royalties to local governments in its countries of operation.
- Working in cooperation with suppliers, other companies, mobile operator associations and employers' organizations, the company supports the development of approaches to promote decent work for parents and caregivers and address child labour. This can include, for example, the adoption and promotion of 'living wages' and family-friendly policies within the company's own operations and with suppliers.
- Mobile operators offer new opportunities through their technology for parents and caregivers to generate income and support innovation, e.g. through the use of mobile payments, savings and credit solutions.
- Companies can join collaboration initiatives that seek to address different challenges relating to exploitation, such as Tech Against Trafficking, or where companies work together to raise standards and to build capacity among shared suppliers, such as Joint Audit Cooperation and the Responsible Business Alliance.

See other ways mobile technology can support child rights in the following sections 1.3.3 and 1.3.4.

1.3.3 Technology for good – commercial solutions

Baseline expectation: The company's commercial offerings support the realization of children's rights. This can include research, innovation, and product or service development that aims to provide affordable access to information and communication technologies among under-represented and marginalized groups, or development of commercial digital solutions that directly benefit the rights of children, including their health, well-being and education.

Guidance: There are many ways that mobile operators can innovate on affordability to address issues like irregularity of income and access, including accessibility challenges faced by persons with disabilities. These solutions can open many new opportunities for parents and caregivers of the most marginalized children and improve the lives of families and children as a result.

- The company has commercial offers that enable access to digital services to bottom-of-the-pyramid or other disadvantaged population groups. These can range from solutions that support customers with irregular incomes to stay connected, to mobile financial services and products that facilitate savings and access to loans and insurance.
- The company's product and service portfolio includes products and services that support children's survival and development; promote healthy lifestyles for children; promote positive parenting practices; improve the protection of children from online harms such as sexual exploitation and abuse, and support broader access to critical information as well as products and services among those who are marginalized. This can include, for example, various commercial digital services promoting maternal, infant and child health, or commercial services for education and remote learning.
- The company makes efforts to tackle access barriers faced by particular underrepresented groups (e.g. women) within its customer base.

A more complete list of how mobile operators can support children's rights, including industry best practice, can be found in the UNICEF and GSMA joint project on 'Enhancing Children's Lives through Mobile.'

Further action: The results of human rights and child rights assessments inform the company's commercial solutions and social investment programs in ways that address adverse child rights impacts and risks identified.

Guidance: Child rights risk and impact assessments (see section 1.1.2) may identify areas where commercial programs or social investments could play a role in mitigating and preventing identified risks.

- The company uses findings from human rights or other risk and impact assessments as an input to the company's social investment and product development activities, to understand how company resources can be used to mitigate risks and positively impact the rights of children across the company footprint.
- The company adopts a holistic child rights-based approach in these efforts (addressing protection, participation, and privacy issues simultaneously), ensuring that by protecting some rights it is not impacting others. For example, its parental control solutions also take into account children's right to privacy.

1.3.4 Technology for good - social investment and in-kind giving

Baseline expectation: The company has social investment programs that support the realization of children's rights. These can include programs or initiatives to broaden access to information and communication technology and services for disadvantaged, under-reached or marginalized populations.

Guidance: Mobile operators' social investment and community programs can range from stand-alone initiatives to contributions and cooperation with government and civil society programs that are already in place. In both scenarios, companies should seek strategic investments based on the priorities or context of each country and business operation, including health, education, recreation, child protection and raising awareness of children's rights.

- The company explores how it can leverage its core competencies to develop products and services that support children's survival and development; promote healthy lifestyles for children; promote positive parenting practices; improve the protection of children from online harms such as sexual exploitation and abuse, and support broader access to critical information as well as products and services among those who are marginalized. This can include the use of anonymized mobility data to support the work of international organizations and aid agencies within the privacy requirements of local law and internationally defined principles.
- The company has programs in place to support schools and children's education. These may include providing access for schools in remote areas; product donations to and development of products for low-income communities (e.g. low-cost plans/devices); digital literacy programs targeting marginalized children, and/or long-term infrastructure developments to increase access to mobile technology.
- These activities align with core business activities and strategies, to be more impactful and sustainable in the long-term. The company has planned for long-term outcomes as well as sustainable investments that are designed to last beyond its presence and support of any specific project. This can be through 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 investments in the long run.
- The activities align with local and national priorities (for example, the countries' Sustainable Development Goal priorities and targets).

A more complete list of how mobile operators can support children's rights, including industry best practice, can be found in the UNICEF and GSMA joint project on 'Enhancing Children's Lives through Mobile.'

Further action: The company seeks to understand potential adverse or unintended impacts to children of its social investment and community engagement activities – including such issues as access to information, freedom of expression, privacy and rights impacts online.

Guidance:

- Before launching social investment activities, the company considers whether the planned activity may result in adverse impacts to children. An example: blocking access to content that is deemed inappropriate for children creating negative impacts on their right to access information; or inequalities of access to services increasing between different groups as a result.
- The company considers risks relating to when the company may no longer be able to continue to support the activity.
- If the company engages in zero-rating, it seeks to identify how all aspects of its zero-rating policies and practices affect children's fundamental rights to freedom of expression and information, to privacy, and to freedom from discrimination, and to mitigate any risks posed by those impacts.
- The company, in collaboration with partners, re-evaluates whether changes are needed in the focus of existing programs when there are significant changes in the external environment that may bring new risks or opportunities, such as with the COVID-19 pandemic.

1.3.5 Disaster relief and crisis efforts

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

Guidance: Emergencies are extremely difficult environments in which to operate and companies should consider the most valuable ways they can support efforts without hindering the work of relief agencies. Providers of essential services like mobile operators can make direct contributions of service to relief operations, particularly if structured and integrated into broader international efforts. These can also include longer-term support for children affected by disasters, e.g. through technology solutions that support their continued education.

- The company engages in durable partnerships with respected providers of humanitarian assistance.
- The company has in place business continuity plans for different disaster and crisis scenarios and these plans include considerations for children.
- The company business continuity plans account for families of employees and how they may be impacted.

Further action: In countries that are prone to disaster, the company's disaster preparedness and response plans and processes relating to services, technology, and connectivity encompass government and community consultations, including with children.

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 capacity 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). Children 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.

- In the context of disaster assistance, the company supports sustainable community development through DRR that emphasizes community dialogue.
- The company DRR considers children as active players in community preparedness and involves them in DRR planning.

2 CHILDREN AND THE DIGITAL ENVIRONMENT

2.1 POLICY ON CHILDREN'S RIGHTS IN THE DIGITAL ENVIRONMENT

Baseline expectation: The company has defined a company-wide policy, principles, standard or code of conduct that addresses children's rights online and these are applied in all of the company's local operations.

Guidance: Mobile operators can have an impact on children and their rights both online and offline.

The company has adopted a policy on children's rights in the digital environment. The policy aligns to international standards, is informed by child rights impact assessments and stakeholder engagement and identifies individuals or teams responsible for its implementation. The policy covers a commitment to:

- Respect internationally recognized human rights and international standards and regional standards as they relate to children in the digital environment, such as privacy regulations.
- Integrate child rights considerations into all appropriate corporate policies and management processes.
- Collaborate in creating safe and age-appropriate online environments; educating children, parents, caregivers, and teachers about children's safety online; building children's resilience online; and supporting responsible use of information and communication technologies.
- Define what constitutes material and content that the company will not accept in its services, and develop standard procedures to handle child sexual abuse materials (CSAM).
- Put in place training and controls on the policy, and monitor and evaluate its implementation.
- Report publicly on the progress of implementation of the policy.

Such a policy could also cover the issues addressed below in Section 4 'Products, Sales and Marketing'.

Further action: The company's principles, policy, standard and/or code regarding child sexual abuse materials (CSAM). is extended to all relevant business partners, including suppliers.

Guidance:

The policy, standard and/or code is clearly communicated to and reviewed with all relevant business partners. It should be easily accessible and any updates/revisions should be communicated in a timely fashion.

The company measures and assesses the implementation of the policy, and reports on these in a transparent way (*see 1.1.4 above*).

2.2 COMMUNICATING ABOUT THE COMPANY'S POLICY ON 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:

Terms and conditions of service communicate to customers that:

- Accessing, storing, making available and sharing of illegal content, including CSAM, will not be tolerated.
- The company will cooperate with hotlines and law enforcement investigations in the event that illegal CSAM is reported or discovered.
- The company will not unnecessarily prohibit the free flow of information on the internet. Where the company proactively blocks known illegal CSAM, the terms and conditions inform customers of this policy.

This information should also be clearly available on the company's website.

2.3 SAFETY BY DESIGN

Baseline expectation: The company takes proactive steps to assess the positive and negative impact on children's rights across different age groups in the design, development and introduction of new digital products and services.

Guidance: It is much more effective to proactively build features related to children's rights into products and services than to try to react to the consequences of rights infringements and associated impacts on children. There is a significant opportunity to support children's rights in an age-appropriate way through products and services that have these considerations built in.

- The company proactively identifies and documents how products and services may be used to harm or exploit children and applies 'safety by design' and 'privacy by design' practices. It regularly assesses how products and services, including resources provided for customers, could facilitate child exploitation and abuse or other online harms directly or raise secondary or indirect risks stemming from their use. Based on the assessment, the company takes proactive steps to mitigate harms or exploitation and to ensure continued good practice over time. Actions can include:
  - Product development or modifications that address specific risk factors.
  - Training and awareness-raising among staff and consumers on the legal, moral and physical ramifications of child exploitation and abuse, and how and where this should be reported.
  - Partnering with stakeholders, including children, or law enforcement to understand, prevent or address misuse of products to exploit or abuse children.
  - Regularly auditing the company's risk assessment and mitigation procedures to make sure they are up to date and applied as intended.

2.4 PREVENTING ACCESS, SHARING AND STORING OF CHILD SEXUAL ABUSE MATERIAL (CSAM)

Baseline expectation: The company has in place measures to restrict access, sharing and storing of CSAM that are consistent with local laws and international standards, and these restrictions are strictly limited to CSAM.

Guidance: Blocking access to known CSAM will help limit its spread and prevent further re-victimization of the children impacted.

- The company deploys internationally recognized URL or website blocking lists created by appropriate authorities (e.g. the national law enforcement or hotline, Cybertip Canada, Interpol, IWF), to make it harder for users to access identified CSAM. These lists should be implemented across the company's operations when possible.
- If customers attempt to access websites or pages that are restricted, the company redirects the customer to a 'STOP page' which clearly explains the reasons why the page has been removed from view. This page includes contact details for customers to be able to file complaints if they think a page should not be restricted. It also includes contact details for help for persons with sexual interest in children.
- To receive help requests from local and international authorities and CSAM hotlines, the company has assigned focal points to receive any requests in investigations relating to CSAM. A legal review of all requests should be carried out and procedures should be in place to reject requests that do not follow the rule of law.
- Internal functions, such as customer care, fraud prevention and security know how to handle and escalate reports of potential CSAM so these are submitted to law enforcement and hotlines. Ideally, this should be done in a way that neither exposes front-line staff to harmful content nor re-victimizes the affected child/children and young people.
- Companies that host materials should refer to 'Notice and takedown' procedures in section 2.5 below.

Further action: The company is advocating for up-to-date laws relating to online child sexual exploitation and abuse.

Guidance: Laws may often lag behind technological developments or national regulations do not provide sufficient protection to children in the online space. This may mean that sharing, possessing or accessing CSAM online as opposed to offline may not be criminalized. Having an up-to-date understanding of emerging issues, as well as clear and effective laws and procedures, will help all parties involved to combat CSAM more effectively, including internet service providers such as mobile operators.

2.5 'NOTICE AND TAKEDOWN' PROCEDURES AND IDENTIFICATION OF CSAM

Baseline expectation: If the company hosts content, or sells content storage services on the cloud provided by a third party, it has 'notice and takedown' processes in place or ensures that the third party partner does.

Guidance: Illegal CSAM can only be permanently removed from the internet if done by the company that hosts the website or platform where the content is residing. If illegal content remains accessible longer than necessary, opportunities to reduce risks to children are missed.

- If the company hosts websites or provides cloud storage services, it has in place processes to immediately remove access to any CSAM that is found – including notice and takedown processes and procedures in place to remove CSAM/illegal content. If the company's cloud services are provided by a third party, the company requires the third party to have such procedures in place.
- This process includes legal reviews to confirm the authenticity and legality of requests and designates the responsible teams involved, limiting the exposure by employees to the content in question as much as possible at every step.
- Effective policies and procedures for documenting and retaining evidence are established to make sure that all relevant evidence is passed on to law enforcement when legitimate and legal requests are received. This includes records of the profile/location of where it was discovered, and notification of the person(s) responsible for the policy.
- To address situations where staff may be exposed to abusive material, a policy or program is in place to support staff resiliency, safety and well-being of staff.

UNICEF and the GSMA Mobile Alliance offer guidance on this assessment area in 'Notice and Takedown: Company policies and practice to remove online child sexual abuse material'.

Further action: If the company hosts content, or sells content storage services on the cloud provided by a third party, proactive identification technologies that also maximise rights to privacy and security, such as scanning technology, are in place to identify images that are most likely to contain CSAM, before they are shared.

Guidance:

- If the company hosts websites or provides cloud storage services, it has in place proactive technical measures to identify and block known illegal content before it is uploaded. Many options, such as photo hashing technology, are available for filtering and blocking of illegal content. If the company's cloud services are provided by a third party, the company requires the third party to scan content prior to upload.
- The company works in partnership with others seeking similar solutions, helping to create more effective approaches to blocking and filtering. For example, see the Technology Coalition.
- The company has processes in place to report any materials found to hotlines or other clearing houses or law enforcement, depending on the local legal requirements.

2.6 SUPPORTING MECHANISMS TO REPORT CSAM

Baseline expectation: The company works with relevant partners to promote and provide free access to hotlines to report CSAM.

Guidance: Customers should be aware of how to report CSAM. Mobile operators can play an important role in creating awareness of such reporting channels and putting in place mechanisms to ensure that all reports are handled swiftly and securely. At the national level, there are currently two potential reporting solutions for CSAM online: hotlines and reporting portals. A full up-to-date list of all existing hotlines and portals can be found at INHOPE.

- Hotlines: An interactive version of the GSMA INHOPE guide is available that provides guidance on how to develop internal processes for customer care staff to submit reports of questionable content to law enforcement and INHOPE.
- Reporting portals: The IWF offers a reporting portal solution that allows internet users in countries and nations without hotlines to report images and videos of suspected CSAM directly to the IWF through a bespoke online portal page.
- If a national hotline is available, the company links to it from its corporate website and from any relevant content services promoted by the company. If a company is operating in markets with less developed regulatory and law enforcement oversight of this issue, it can refer reporters to the INHOPE website, where any of the international hotlines can be selected to make a report.
- When promoting reporting mechanisms, the company includes clear information on its usage by, for example, giving guidance on the illegal content and conduct to be reported and clarifying what materials cannot be attached with the report in order to avoid further distribution on the web.
- In addition, or alternatively, the company provides customers with dedicated contact points to report any such material, which is then referred on to hotlines. The company has developed a working relationship with the national hotlines where they exist and has agreed processes for reporting CSAM to them. If a relationship with law enforcement and a hotline is not already established, it engages with them to develop processes together.

Further action: The company is supporting the establishment of a hotline in countries that do not already have one.

Guidance: If a national hotline is not available, the company is exploring opportunities to set one up (see the GSMA INHOPE Hotlines Guide for a range of options, including working with INHOPE and the INHOPE Foundation).

2.7 MEASURES TO PROTECT CHILDREN FROM INAPPROPRIATE CONTENT

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

Guidance: Parental control tools can be effective in enabling parents and caregivers to support children to have positive experiences online. Considering that these control tools can have significant implications on a child's ability to access information and opportunities online, they should be designed in ways that align with children's evolving capacities and with their developmental context accompanied by appropriate guidance for parents and caregivers. For example, children between the ages of 6-9 years will require very different safeguards from those over 13 years of age. At the same time, it should be recognized that children mature at different rates, and age ranges are not a perfect measure of the needs and evolving capacities of each individual. Importantly, children should not be unduly restricted from accessing legitimate and helpful information such as educational material or health and wellness resources online.

- The company offers or promotes simple and intuitive tools for parental control for younger children that work on network, device or application level. This can be company branded or solutions offered by others.

- For any tools that the company provides directly, these are set up so that if parents or caregivers opt to use them, they are easy to install and configure. The company clearly states what the controls cover and what their limitations may be, for example, when outside of the operator network (on Wi-Fi). Options of functionality that can be included among the controls are: lists of safe vs. unsafe web pages ('white' and 'black' lists, different levels of content filters); usage monitoring; contact management; geolocation; and time/program limits. Parental controls that allow for tracking should make it clear to children when they are being monitored.

- No data is collected from children under the age of digital consent for the purposes of parental controls without parental consent, as appropriate, and the company clearly identifies why it collects this data. Data collected by parental control or related tools should not be reused for commercial purposes.

- Parental control systems are accompanied by guidance on their appropriate usage so that children's rights to privacy, access to information, and play (among others) are not infringed.

- Where possible, the company promotes national support services that parents and caregivers may use to report infringements and seek support in the case of abuse or exploitation.

2.8 PROMOTING RESILIENCE AND SAFE INTERNET USE

Baseline expectation: The company provides advice to children, parents, caregivers, and teachers on how technologies work and guidance to understand the actions they can take to stay safe online.

Guidance: As those closest to the child, parents, caregivers and teachers have the greatest opportunity to influence safe behaviours. Parents and other caregivers are also best positioned to apply methods that are in the best interests of a child and appropriate for their individual level of maturity. Efforts to support child safety online should also aim to support children's resilience to confront issues online with confidence and to seek support of adults when needed, and to support other children as peer educators or ambassadors on these issues. Advice to children and adults should consider that different approaches will be appropriate for different ages and maturity levels. It is important that children's right to privacy of communications and movement; and their right to access information, express themselves and play are equally considered in these approaches.

- The company actively supports the primary role of parents or caregivers in evaluating and minimizing risks of harm to their children online. The company encourages adults, including parents, caregivers, and teachers, to be involved in children's consumption and use of online content, so that they can help and guide children in the choice of content, as well as helping establish rules of behaviour and good conduct.

- The company operates dedicated websites or other materials to provide safety tips, articles, tutorials, features, and dialogue about digital citizenship, as well as links to useful content from third-party experts and access to helpdesks or other support services. Alternatively, companies can join forces with other companies to create parental support materials together – an example of this is www.internetmatters.org

- The company partners with local experts, such as children's NGOs, charities, and parenting groups or consults children directly (see section 1.3.1 above), to shape the company's safety messaging and reach the intended audience.

- The company provides transparent, clear, and easy-to-use information on products and services to help empower both young users and parents or other caregivers. Safety advice should be easily spotted and provided in clear and simple language. The company should make efforts to track the impact and effectiveness of these safety resources.

- The company approach includes mechanisms to educate parents or caregivers to become involved in their children's online activities, particularly those of younger children by, for example, enabling parents to review children's privacy settings.

Further action: The company leads or takes part in digital literacy programs in schools and other educational settings.

Guidance: Teachers and educators are in a key position to support children in gaining digital skills and staying safe online. The need to support digital skills of teachers has been highlighted during the COVID-19 pandemic. Digital skills will become ever more critical as they become an increasingly central part of working life. 'Digital literacy' can be defined as the skills that are needed to live, learn, and work in a society where communication and access to information is increasingly through digital technologies, including mobile devices.[18]

- The company works with child rights experts, schools and government educational institutions to define what role the company can play in supporting digital literacy of teachers and children and to embed new technologies and connectivity to teaching methods. These programs are aligned to the early childhood education and/or national school curriculum as well as programmes for out-of-school children in each country of operation.
- As well as providing access to connectivity and devices, additional elements of digital literacy are considered in the programs: ICT proficiency; information, critical thinking and media literacy to counter fake news; digital learning and development; digital creation innovation and scholarship; communication, collaboration and participation; and digital identity and well-being.
- The company measures the effectiveness of all of its programs, from child online protection to digital literacy and resilience, to make sure they are having the intended outcomes and effects on behaviour change.

Learn more about the Giga initiative, launched by UNICEF and ITU, dedicated to connecting every school to the internet and every young person to information, opportunity and choice here.

2.9 SUPPORTING CHILD HELPLINES

Baseline expectation: The company promotes child helplines and other services that enable children to seek support in the case of concerns, abuse or exploitation both online and offline.

Guidance: Child helplines play a crucial role in supporting children who are experiencing challenges or abuse, whether online or offline. During the COVID-19 pandemic these services have been under pressure as demand for them has grown. Mobile operators can support the work of child helplines in many ways.

- The company promotes child helplines though its marketing channels.
- The company provides free calls to child helplines and waives any interconnect charges with other telecom operators. The company also supports any call routing that may be needed to forward calls to specific experts or services in a different language.
- The company ensures that any parental control solution it provides does not prevent children from accessing child helpline services. Calls to child helplines should not appear on itemized phone bills to protect children's privacy.
- More information and case studies on collaborations between mobile operators and child helplines can be found in the GSMA and Child Helpline International Practical Guide.

Further action: The company provides support to child helplines beyond awareness and access, e.g. through capacity building and in-kind support.

Guidance:

The company also supports the work of child helplines in other ways, including operational support, such as:

- Sharing call statistics to better plan resourcing.
- Supporting helplines with expertise on new technologies (e.g. trends to prepare for) as well as developing staff skills.
- Providing in-kind support via IT tools, devices and data centres, and facilities.
- Providing helplines with expertise on child online protection issues.

For a complete an assessment of Children and the Digital Environment, the following elements of other sections should also be included:

Section 3: Human Resources
3.4 Child Safeguarding

Section 4: Products, Sales and Marketing
4.1.2 Data Protection
4.2.1 Marketing and advertising policy
4.2.2 Marketing and advertising: Implementation and governance including sponsorship policy

Section 7: Security
7.5 Privacy and freedom of expression during emergency situations

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18 Western Sydney University, 'What is Digital literacy?'

3.1 CHILD LABOUR AND YOUNG WORKERS

3.1.1 Minimum age

Baseline expectation: The company has a policy clearly stating the minimum age for employment, which is in line with or older than national law or international standards, whichever is higher. All employees, especially those in charge of recruitment, such as HR teams, recruitment agencies and managers, and other appropriate employees, are made aware of minimum age requirements and relevant control mechanisms and trainings. Investment in HR systems (e.g. age verification) and capacity-building activities are in place.

Guidance:
- The policy clearly states the minimum age for employment in line with national law or international standards, whichever is higher. It includes 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 is 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 (as relevant for the countries where the operator is present) and understandable for low-skilled workers. Efforts should also be made to make sure the policy is understood by illiterate workers.

Minimum practice here would include 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.

Further action: Company records of employees include proof-of-age documentation.

Guidance: Ensuring all employees have proof-of-age documentation in place will help identify young workers entitled to specific rights and can prevent children below the legal working age being hired by the company.
- The company maintains a record of proof-of-age documentation of all employees, such as a copy of a birth certificate or a government ID.
- If government identification is not available, or there are concerns over the authenticity of proof-of-age documentations, the company has identified other approaches that can be adopted to determine age of a potential employee. Guidance can be drawn from ILO Minimum Age Verification.

3.1.2 Minimum age policy violation remedies

Baseline expectation: The company has clear policies and processes in place that protect the best interests of the child when managing remediation in cases where children below the minimum age are found to be working, in every country where the company operates.

Guidance: Where this is found, the company removes children from situations of child labour – and immediately from hazardous situations – while promoting the best interests of the child by providing alternatives that prevent her or him from being pushed into more dangerous survival alternatives, such as sexual exploitation or trafficking.
- The company continuously monitors and analyses information on children employed in violation of minimum age requirements; the company can do this alone or in partnership with other actors such as government child protection systems.
- The company has in place mechanisms to manage situations where child labour is found in its operations. Before an underage worker is dismissed from employment, these remediation programs consider:
  - 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.
- Each incident requires an approach tailored to the child's age, working conditions, home situation and education level, and the availability of schooling based on the child's best interests. Companies should 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 has established a procedure to identify high-risk countries, regions or activities for all forms of child labour, and has a process in place to mitigate risks accordingly.

Guidance:
As part of its overall human rights and child rights risks and impact assessments (see 1.1.2 above), the company has in place processes to understand the specific situation and risks relating to child labour in the areas, countries or regions where the business is operating. Close attention is paid to situations where:

- There is a high inherent 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.
- Low levels of birth registration, weak legal systems, and lack of government policies/effective institutions.

3.1.3 Worst forms of child labour

Baseline expectation: The company has identified risks related to the worst forms of child labour (including but not limited to hazardous work, trafficking, sexual exploitation, debt bondage and forced labour) linked to its operations. Company policies prohibit work that is 'hazardous' (harmful to health, safety or morals) for workers under age 18 in accordance with national law or the relevant international Labour Organization (ILO) standard, whichever is stricter. Where risks are identified, human resources teams and others responsible for recruitment are made aware of the risks and relevant control mechanisms and trainings.

Guidance: The worst forms of child labour include hazardous work, trafficking, sexual exploitation, debt bondage and forced labour. For mobile operators, hazardous work could include working at heights or with electricity (technical maintenance) or being exposed to harmful chemicals/toxins. Additionally, any work that happens at night or requires long hours may also fall under the definition of 'worst forms of child labour' under local legislation and ILO standards.

- The company has a full understanding of what specific local requirements may exist relating to young workers, i.e. employees above the legal minimum age (or 15 as per ILO standards, whichever is higher) but below the age of majority – usually employees between 15—18 years of age. Special requirements may include limited working hours per day, additional rest periods, parental consent, or health examinations before starting work.
- The company has identified types of tasks and work that is prohibited for workers under 18 years of age.
- The company maintains a record of all employees under 18 years of age, and provides ongoing supervision.
- There are periodic reviews and reporting 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.
- If child rights violations are discovered, the processes for remedy are followed as identified in section 3.1.2.

3.2 TRAINING AND DEVELOPMENT OPPORTUNITIES FOR YOUNG WORKERS

3.2.1 Supervision and training

Baseline expectation: A mechanism is in place for supervision of young workers under 18 years of age, with clear instructions and training on how to perform tasks safely and effectively.

Guidance: Young workers are often new to the working environment, so it is especially important that they receive any relevant health and safety training and training on how to handle any incidents at work.

- Training and supervision are provided for workers under 18 years of age who are employed by the company to make sure that they are not required to handle tasks that are beyond their physical and psychological capacities.

ILO provides further guidance on health and safety considerations for companies employing young workers.

Further action: Training is provided for workers under 18 years of age on their rights as outlined in the applicable ILO 'Decent Work' agenda.

Guidance: The ILO 'Decent Work' agenda calls out for "opportunities for work that is productive and delivers a fair income, security in the workplace and social protection for families, better prospects for personal development and social integration, freedom for people to express their concerns, organize and participate in the decisions that affect their lives and equality of opportunity and treatment for all women and men". These same requirements should be extended to young workers who, as new members of the workforce, may not be as aware of their rights as their adult counterparts.

- Workers under 18 years of age receive training on their rights, provided in formats that are easy to understand and using their local language. The company evaluates the effectiveness of 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.

3.2.2 Opportunities for workers under 18 years of age

Baseline expectation: For companies that employ workers under 18 years of age, flexible hours are available for them to pursue development opportunities both at and outside the workplace.

Guidance: Young workers under 18 years of age should have an opportunity to continue to pursue further education, if they so choose, while they are working. Companies should remove obstacles and make concrete efforts to encourage and help young workers to combine work and further education.
- The company aligns its vocational training programs with government-led national development plans, in particular regarding digital skills.

Further action: The company offers a variety of work opportunities for workers under 18 years of age but older than the mandatory schooling age – through work experience or apprenticeships, vocational training or paid internships.

Guidance: Companies can contribute to the opportunities and development of young workers under 18 years of age by providing different opportunities to try, test and learn in the practical working environment.
- The company supports or collaborates with schools and educational institutions and provides work experience, apprenticeships, vocational training or paid internships to young workers under 18 years of age.

More about the value and importance of providing opportunities to young people can be found on the Generation Unlimited website.

3.2.3 Collective bargaining

Baseline expectation: When collective bargaining agreements are signed by the company, these cover the right to collective bargaining by workers under 18 years of age. The collective bargaining agreements signed by the company have measures in place to protect these workers from discrimination, violence and abuse. If workers under 18 years of age are allowed to be union members or participate in a union, they are assigned a union representative to make sure that their rights are fulfilled.

Guidance:
- Collective bargaining agreements include workers under 18 years of age.
- Young workers are assigned a dedicated union representative.
- Workers under 18 years of age understand their labour rights, and 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 workers under 18 years of age – and implementation of this policy - is monitored regularly and communicated to all staff.

Guidance:
- The collective bargaining agreement includes a zero-tolerance clause regarding harassment and exploitation of workers under 18 years of age. This clause applies to full-time, fixed-term or part-time workers.
- Company policy on zero tolerance regarding harassment and exploitation of workers under 18 years of age is in place in situations/countries where those under 18 years of age can't be included in collective bargaining agreements. This policy applies to full-time, fixed-term or part-time workers.

3.3 EMPLOYMENT POLICIES AND BENEFITS

3.3.1 Paid parental leave and flexible work

Baseline expectation: Family-friendly policies are established for parents and caregivers that include paid parental leave (e.g. maternity, paternity and adoption leave), flexible work arrangements or part-time work. At minimum, these align with ILO standards and local law in each location of operation, and at a higher standard when possible. The company has put in place specific safeguards to make sure that pregnant and breastfeeding women, or employees on parental leave are not discriminated against in hiring, employment and promotion decisions.

Guidance: The way parents and caregivers are treated at work has significant impact on their children. This applies to all employment policies, especially regarding non-discrimination and family-friendly workplaces.

- The company complies with the provisions of ILO Convention No. 183 on maternity protection, including the international minimum of 14 weeks' paid maternity leave, with a compulsory six-week period after birth, and considers providing the recommended 18 weeks. Compensation during maternity leave should equal at least two thirds of previous earnings.

- Adoptive parents are entitled to the same leave as biological parents.

- Paid leave is provided for fathers in line with local legislation at minimum, and ideally beyond.

- These policies are communicated to all employees, especially managers, in an accessible format and language.

- Proactive steps are taken to prevent discrimination against pregnant women and mothers. There is a ban on any pregnancy testing or demands for sterilization certificates of women of childbearing age applying for a job. Pregnant women are able to take time off for pre-natal appointments and the company prohibits the firing of pregnant employees, or those on parental leave, because of their status.

- Managers are aware of the leave all parents and caregivers are entitled to. Manager trainings and policies emphasize that any discrimination of employees is not tolerated based on their desire to take any length of parental leave they are entitled to.

Further action: The company has taken steps to implement leave and working hour policies that go beyond those defined in local law. These can include extended parental leave, additional compensation for employees on parental leave and/or flexible working hours and family-friendly leave arrangements or part-time work for working parents and caregivers.

Guidance:

- The company's parental leave policies go beyond ILO Convention No. 183 and local law (whichever is highest) in time and/or compensation.

- The company has a flexible and part-time working policy.

- The company measures and tracks how parental leave and flexible working policies are taken up by employees; how many employees return to work from parental leave, and regularly reviews its approach as needed based on the results.

3.3.2 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:

- Internal guidelines protect pregnant women in the workplace, identifying specific tasks that may be hazardous to their health. For mobile operators, e.g. working at height, security, customer service and call centre staff may require special considerations.

- Travel policies take into account the particular needs of pregnant employees, for example, by giving them the choice to decline long-term or arduous business travel or by ensuring they can travel in business class for long haul flights after the second trimester.

- Pregnant workers are 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 negatively impact the worker's wages. The company complies 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 employees.

3.3.3 Breastfeeding support

Baseline expectation: The company offers breastfeeding mothers who return to work safe and appropriate facilities to breastfeed or to express breast milk and store it safely. It also offers paid breastfeeding breaks during working hours and respects any shortened working day or week they may be entitled to by local law.

Guidance: Particularly in jurisdictions where maternal/parental leave entitlements do not exceed six months, company support for mothers who return to work can make a significant difference in their decision to exclusively breastfeed or return to work. It also sends an important message to all employees of a gender-responsive, inclusive workplace.

- Women returning from maternity leave should be provided with safe and hygienic facilities in the workplace where they can breastfeed or express milk and store it safely during working hours. Such facilities can be combined with health facilities on site, for example. They should ensure privacy and have handwashing facilities, equipment and a fridge to store milk. See UNICEF guidance on 'Breastfeeding support in the workplace' for details.

- Breastfeeding mothers are provided with paid breastfeeding breaks that allow enough time to breastfeed or express milk during working hours.

- The company respects and informs new mothers of any legal provisions that may allow them reduced working hours without a wage impact for a defined period of time while they continue to breastfeed (usually this time ranges from when the child is 6 months to 2 years old).

3.3.4 Other benefits

Baseline expectation: Employee policies stipulate payment of statutory sick pay, overtime pay, and social contributions to all its employees, including young 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: Consider the needs of workers who have family responsibilities in the scope of benefits provided by the company. Ensuring these benefits are gender-sensitive, non-discriminatory and inclusive of all kinds of families is a key consideration for an inclusive workplace that treats all employees and their children equally. Anti-discrimination policies are important to protect all children by ensuring their parents receive fair and equal opportunities and benefits in the workplace.

- Benefits that are available to nuclear, biological families are extended to single-parent families and workers with different family compositions, regardless of the marital status or sexual orientation of parents, caregivers or children's legal status as dependants (e.g. adopted, fostered, stepchild, offspring from a previous relationship, etc.).
- The company has anti-discrimination policies in place, so that all employees have the same access to employment, training, and progression within the company across different types of functions and levels without, "distinction, exclusion or preference made on the basis of race, colour, sex, religion, political opinion, national extraction or social origin (among other characteristics)", as per ILO Convention No. 111.

Further action: Employee policies stipulate additional provisions for parents and caregivers, such as supporting children with disabilities and special leave arrangements for migrant workers.

Guidance:

- The company has benefits for parents and caregivers of children with disabilities that take into account additional needs for flexibility and other considerations.
- Company benefits account for situations where parents and caregivers may need leave for gravely ill children.
- If the company employs migrant workers, support is available to children in the home or children left behind. This could include offering family housing in which workers could maintain their family units or permitting time for family reunification or family visits.

3.3.5 Health care provisions

Baseline expectation: The company offers access to health care advice and supports access to or provision of health care services, including for family members, when this is not adequately provided by the state.

Guidance:

- In countries where access to health care is not provided by the state, the company benefits include health insurance that includes all dependents. It is particularly critical for children and their families to have access to quality health care services in during the COVID-19 pandemic.

The company may offer health care services in the office environment, ranging from on-site clinics to offering vaccinations to staff on-site.

3.3.6 Childcare support

Baseline expectation: Provisions for accessible, affordable and quality childcare exist and are supported by the company. In locations where childcare services are inaccessible, expensive or of poor quality, the company either provides access to childcare facilities or caregivers or supports employees in other ways (e.g. paying childcare and/or school fees, referral systems, etc.).

Guidance: Providing appropriate childcare facilities and support for working parents and caregivers is an investment in the workforce. Workers are better able to concentrate knowing their children are safe, stress associated with childcare logistics is reduced, and it can encourage especially skilled female workers to remain with the company.

- Company benefits may include childcare facilities in the workplace; subsidies for childcare fees; referral services to help workers find a suitable childcare centre; or ad hoc babysitting services for employees.
- If the company establishes workplace childcare facilities, these are assessed for quality on a regular basis.

Further guidance is available from the IFC: *Guide for Employer-Supported Childcare*

3.4 CHILD SAFEGUARDING

3.4.1 Misuse of company resources to exploit children

Baseline expectation: A policy is in place to prohibit the use of any company facilities, property, expense accounts, and IT networks for any purposes involving child exploitation and physical, emotional, sexual or verbal abuse – or these considerations are embedded in company policies regarding travel, expenses, IT use or other codes of conduct.

Guidance: Employees may come into contact with children in their everyday work, when volunteering on company time, or when traveling for business. It is important for protection of all parties that any interactions with children are framed in ways that do not allow for any misconduct. There are also risks that employees use company equipment or business travel to exploit children.

- The company prohibits the misuse of company property or information and communication technology for sexually exploitative conduct.
- Guidelines on how to meet these requirements across the company are developed and supported by training.
- A significant amount of child sexual exploitation and abuse happens during business travel. Company policies should prohibit the use of expense accounts for any activities related to sexual abuse and exploitation or other forms of exploitation of children. The company prohibits employees from using expense accounts, per diem allowances or credit cards to cover the sexual exploitation of children or to access CSAM, outlining that the company is committed to working with law enforcement regarding any misuse of its assets. See ECPAT International's 'Global Study On Sexual Exploitation of Children in Travel and Tourism 2016' for more.
- The company implements measures to detect unusual activity on company servers to prevent the use of company devices and systems for sharing CSAM. There are also dedicated solutions that can be bought to identify the use of company IT equipment to share CSAM.

Further guidance can be found in UNICEF's *Child Safeguarding Toolkit for Business*.

Further action: Background checks have been carried out on employees who have direct contact with children – whether in person or online.

Guidance:
- If any staff members work with children directly (including young workers under 18 years of age), the company requires a criminal record check with police authorities before employment.

3.4.2 Child safeguarding policy

Baseline expectation: There is a dedicated policy specifying child safeguarding controls and accountabilities for all employees who come into contact with children as part of their work activities, whether in person or online. The policy is communicated to all employees, with a focus on those who have direct contact with children, and is communicated externally, as relevant.

- The company has reviewed and mapped situations where staff may have direct contact with children and outlines procedures and specific considerations to safeguard children in all such activities. This includes, when appropriate, to address child safeguarding with business partners when organizing events at external venues, for example. Procedures specify that children's consent should always be sought before participation; they are always appropriately supervised, shown respect, and are treated fairly and without discrimination.
- The company has defined a child safeguarding policy, facilities or volunteering policies that reduce risks of harm to children in interactions between adult employees and children. For example, it applies the 'two-adult rule' for adult-child interactions, whether these take place in person or online.
- The company has defined and communicates its expectations for child safeguarding to employees, suppliers and other business partners prohibiting any type of violence, exploitation or abuse of children, including, but not limited to, sexual exploitation, and outlines the corrective action procedures for any policy violation.
- Processes are in place for any employees who have direct contact with children in their work (for example, at company stores, events, when supervising workers under 18 years of age, or when they are volunteering), to acknowledge the child safeguarding policy.

Further action: The company has grievance mechanisms in place to receive reports from employees and external stakeholders regarding child safeguarding concerns.

Guidance:
- Company whistle-blowing or other grievance mechanisms include the ability to receive, process, investigate and respond to complaints about violence, exploitation, and abuse of children in the context of business activities, including use of company IT equipment to access CSAM. These mechanisms are anonymous and investigation processes are confidential to protect employees who make reports.
- The grievance mechanisms are accessible to children and to their representatives, such as parents and caregivers, 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.
- The company informs employees, customers, suppliers, service providers, and other stakeholders about the available channels to report incidents of potential abuse (e.g. phone hotlines and online channels).

4 PRODUCTS, SALES AND MARKETING

4.1 PRODUCTS AND SERVICES

4.1.1 Development and promotion of products and services

Baseline expectation: Policies and procedures are in place to assess, review, and monitor products, applications, games, content, and services provided and promoted to customers to make sure they are appropriate and safeguard children's mental, moral, and physical health and development.

Guidance: Many countries have specific, often mandatory, standards for a wide range of goods and services for children. These standards address issues such as acceptable levels of harmful substances along with other safety, privacy and security concerns. For mobile operators, these standards could relate to, for example, radio frequency emissions and related issues (addressed in more detail in section 4.2.3); or cases where companies are marketing and selling products specifically as suitable for children (such as child-directed mobile devices, smart watches, etc.).

- The company has developed relevant policies and standards with reference to national laws and applicable standards.
- The company has identified and reduced potential health dangers from both intended and unintended use of products or services. Any products designed or specifically marketed as suitable for children meet particularly high quality and safety requirements. Safety concerns are also addressed for products or services that are not designed for children's use but may nonetheless present hazards to children.
- The company considers how new technologies may impact child rights or introduce new considerations for child protection. This is relevant, for example, to the increased use of AI solutions by mobile operators or the impacts of 5G and ubiquitous connectivity. These issues are especially relevant when companies provide connectivity to sectors that provide products and services to children.

Further action: When the company works with third parties to develop products and services, it ensures that it communicates, and requires third parties to align to, its policies to assess, review and monitor products and services to make sure they are appropriate and safeguard children's mental, moral, and physical health and development.

Guidance: Mobile operators rely on a wide range of third parties to develop and deliver products and services. It is important the mobile operators use their influence and leverage to make sure that these third parties working on their behalf apply the same standards when it comes to child safety.

- The company communicates its policies relating to children and product safety and security to the third parties it collaborates with. These policies form a part of the agreement and contractual requirements.
- The company trains third parties on its requirements relating to child safety in product development, or child safety is included in other training provided to the third party.
- The company monitors that third parties are implementing its policies and requirements as agreed. This can be through product development approval processes, self-assessments and audits by the company.

4.1.2 Data protection

Baseline expectation: The company carries out privacy impact assessments and sets clear standards for privacy and the collection and storage of personal data about or from children as a result. Collection of data from children is not permitted without the consent of parents or caregivers as defined in local laws.

Guidance: Regulatory regimes increasingly define 'a digital age of consent' below which the collection and processing of personal information requires consent by a child's parents or caregivers. In current regulation, this age usually varies between the ages of 13-18 but is consistently below 18. In line with international norms of children's rights, many of these regulations stipulate that collection, sharing or reselling of children's data should not be undertaken unless specific and valid consent has been obtained. Examples of laws are the United States Federal Trade Commission 'Children's Online Privacy Protection Rule' (COPPA) and the General Data Protection (GDPR) requirements in force in the European Union.

- Collection, storage, and sharing of children's data meet applicable legal requirements, and the company is transparent on how information will be used. At a minimum, the company complies with minimum ages and parental consent requirements as set in law. Companies could go further by both implementing a global digital age of consent in alignment with the highest age limit legally required, and generally consider higher standards for everyone under 18 years of age.
- The company has in place Privacy Impact Assessments (PIAs) that are carried out before any product development, and include considerations for children's data and rights.
- Privacy and data usage policies include specific information on how children's data is handled. The company should make sure that this data is handled (e.g. used, shared, stored, retained) only for the specific purposes the children and/or their parents or caregivers have consented to.
- These policies should also include company contact information for children and parents or caregivers to raise privacy-related questions or concerns; and set out in clear and easily understood language children's and/or parents' and caregivers' rights regarding access, correction, and deletion of their data, and how to go about making such requests.
- These policies are easy to find and written in a language that is easy to understand, including by children.

Additional guidance on children's rights and data privacy can be found in UNICEF's *Industry Toolkit on Children's Online Privacy and Freedom of Expression.*

Further action: The company requires all relevant business partners and suppliers to have policies and processes in place to respect children's right to privacy and data protection that align with legal requirements and the company's policies, whichever are highest.

Guidance: Mobile operators rely on a wide range of third parties to develop and deliver products and services. It may be difficult for customers, especially children, to always understand whose privacy policies apply in which situation as they move between services. This is why it is important that, where these third parties are involved in the collection, storage, and sharing of customer data, they are required to have equivalent privacy policies and practices in relation to children's data.

- Third party partners are contractually required to comply with legal requirements and minimum age(s) for data collection and consent as set in law, or to the standards as the company has defined them (if these are higher).
- Customers are informed whenever they are moving to a service or product of a third party where that third party's privacy policies apply and provided details regarding what data is shared between the companies.
- Controls are in place to make sure that third party partners are applying requirements as agreed.

4.1.3 Pricing

Baseline expectation: The company provides transparent, clear and age-appropriate information about the costs of services, including add-on services. Services are not sold to underage customers, as defined by local law.

Guidance: In most jurisdictions a child cannot personally have a mobile phone subscription – this needs to be arranged by their parents, caregivers, or another adult on their behalf. However, since children still use mobile phones, this should be taken into account in the company's pricing and customer communication.

- When mobile operators market and sell subscriptions and plans to families, this is accompanied by clear explanations of what services are included in the package and what premium services may incur additional costs.
- Parental consent is required for any additional services for subscriptions designed for children. The company provides apps or other ways for customers, including children, to follow their consumption of voice, SMS, and data services, and sends alerts to customers when usage is reaching the maximum allowance on their plan and when additional charges may apply.
- Ideally, the company should find ways to help customers, including children in age-appropriate ways, to understand what the limits of their plan are and how the use of different data services – from web surfing to video streaming – consume data. This will help children manage their consumption and help avoid unplanned costs.
- The company avoids default settings that would easily allow children to access premium services that require additional payment.

Further action: If the company provides any SMS or other mobile payment services directly to customers or to business clients, there are safeguards in place to avoid unintentional purchases by children and/or refund mechanisms are in place for when these occur.

Guidance:
- The company has a policy in place to reimburse accidental or uninformed purchases by children, for example, those made by a child without parental consent. This policy is easy to find and the process for requesting reimbursement is easy and clearly communicated to customers.
- The company works with third parties who may use its payment services to implement the same standards. It is clear to the customer where and who to turn to when accidental or uninformed purchases by children happen.

4.2 RESPONSIBLE SALES AND MARKETING

4.2.1 Marketing and advertising policy

Baseline expectation: The company adheres to relevant local laws and regulations on advertising to children in its advertising and marketing activities and has a global responsible marketing, sponsorship, and advertising policy or code of conduct in place that includes specific considerations relating to children.

Guidance: Depending on the jurisdiction, there may be legal restrictions on marketing that is targeting or may be seen by children, or which uses children's data. Children may by more susceptible and unable to recognize commercial influence. Activities and images depicted in advertising can impact children in other ways, for example by influencing their self-image. The company has in place a responsible marketing policy which covers key child rights considerations such as those listed below. This policy should be updated regularly to reflect the rapidly changing media landscape:

- Product information is clear, accurate, and complete, and empowers parents/caregivers and children to make informed decisions.
- Advertising is clearly identified as such, so that it is easily recognizable by children.
- Influencers for child-directed products, applications, and services are responsibly used (in particular young teenagers and child influencers), and commercial intent clearly identified in a way that is clear and recognizable by children.
- Advertising to children and parents/caregivers promotes healthy behaviours and products as well as positive and diverse role models.
- Advertising does not reinforce discrimination or promote gender or other stereotypes (*see further UNICEF guidance here*).
- Cartoon characters, celebrities or other symbols likely to engage a younger audience in product advertisements are not used.
- Digital marketing directed at children is not placed adjacent to, or on, websites containing content that is not suitable for children.
- Children's data is never collected and used/resold for targeted, behavioural marketing.
- The company does not procure viral marketing campaigns targeted at children and does not deploy sentiment analysis and neuromarketing tactics aimed at children.
- Marketing that includes any direct appeal to children to persuade their parents or other adults to buy products for them, is not used in any circumstances.

See the UNICEF *Children and Digital Marketing Industry Toolkit* for further guidance.

- When children are represented in advertising and marketing: child and parent or guardian permission is obtained; children's safety is safeguarded in all cases; age-appropriate contexts, content, setting, dress and time are observed, and images of children captured from public places are rendered unidentifiable.
- If the company operates in an area where national law on marketing and advertising to children is weak or lacking, then the company takes a proactive approach and implements a marketing policy that incorporates existing best practices on a voluntary basis.

Additional guidance on the above is provided by the *International Chamber of Commerce's Consolidated Code of Advertising and Marketing Communication Practice*.

Further action: The company cooperates with and engages in voluntary marketing initiatives that take account of potential child rights impacts related to product advertising.

Guidance: Apply evolving best practices and join voluntary initiatives that establish marketing codes and standards.

- The company is a member of existing industry initiatives or supports government and national NGO activities to promote healthy behaviour and products.
- The company uses its participation and influence within trade groups or business associations to push for sector-wide principles or codes of conduct in advertising.
- The company supports government initiatives to develop appropriate standards that protect children's rights in marketing and advertising.

4.2.2 Marketing and advertising: implementation and governance including sponsorship policy

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 (including 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 third-party advertising and marketing agencies the company works with.

Guidance: In many cases marketing and advertising activities are outsourced to third parties.

- The company's responsible marketing requirements are communicated to third party partners from the beginning of the relationship and these form part of contractual requirements. Special considerations on children should be included in these policies as outlined in section 4.2.1 (see above).
- Internal marketing teams are trained on the responsible marketing policy and are required to check and audit the compliance of third parties they manage to the company policy.

Further action: The company has policies in place for sponsorship and co-sponsorship of cultural or sporting events, sports teams and individuals that take into account supporting and promoting positive and healthy behaviour and setting a positive example for children. In addition, the company can consider giving some of its advertising space to organizations that promote child rights.

Guidance: Who and what companies choose to sponsor reflects on the company by association. Sponsorships are also a powerful way to use the company's leverage to promote positive role models and behaviour. There are several ways companies can consider exercising this leverage.

- Company's sponsorship policies require the sponsored party to be transparent that they are sponsored by the company, including when they are paid to endorse products and services.

- When sponsoring sports or e-sports, the company considers its leverage to promote positive content and behaviour. Company sponsorship decisions also consider being inclusive and aim to promote a variety of diverse role models for children.

- When the company considers sponsoring an event or person, it has policies and positions in place to avoid being headline co-sponsors and hence associating its brand with other products or services that are not child-friendly or safe for children, such as gambling, alcohol or tobacco, and unhealthy foods or drinks.

- Mobile operators have considerable advertising and marketing platforms and channels at their disposal. Companies can donate space in these channels for purposes and organizations that support child rights. These can include child helplines or organizations that work with vulnerable children such as children with disabilities or refugee children.

4.2.3 Safety of mobile devices

Baseline expectation: The company requires providers of mobile handsets to test and ensure 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:

- The company requires all network device vendors to manufacture and test equipment regularly to ensure that it functions within the limits set by ICNIRP or any local standards for electromagnetic field (EMF) emissions.

- All handsets that the company is reselling are specific absorption rate (SAR) tested to levels that remain significantly below international recommendations.

4.3 GRIEVANCE MECHANISMS FOR CUSTOMERS

Baseline expectation: Within company grievance mechanisms, there is an established and clearly communicated customer service and complaints mechanism where children, or those acting on their behalf, can contact the company about issues relating to its products and services and their use. The grievance mechanism includes processes for receiving, handling, investigating, and responding to complaints.

Guidance:

- The company customer service processes and training include handling complaints and reports from children. The company ensures that customer service agents know how to respond and handle contacts from child customers who may not be direct customers and account holders, whether the issue refers to misuse of services, collection of children's data, or other concerns.

- Given that in most cases children will not be the direct customers and account holders, the customer service mechanism and reporting are also accessible to those who can report incidents on their behalf, such as parents, caregivers, community members, local NGOs, and government officials. Phone hotlines and online chats for reporting incidents can be effective.

- If children report having been harassed or abused while using the company services, depending on the issue, the company has guidance accessible to children on, for example, how to block unwanted calls or messages, and in the cases of child exploitation and abuse, customer service is trained to refer these reports to relevant hotlines, clearing houses or law enforcement as defined within the company's procedures and local legal requirements. See section 2.5 for details of law enforcement collaboration in cases of abuse.

Additional guidance on child-sensitive grievance mechanisms is available in the UNICEF discussion paper on Operational-level Grievance Mechanisms Fit for Children.

5 PROCUREMENT

5.1 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 specific reference to children's rights, and makes this code/policy publicly available. The supplier code of conduct covers minimum criteria in relation to employment policies for parents and caregivers, child safeguarding, and clearly states the minimum age for employment in line with national law or international standards, whichever is the highest.

Guidance: Mobile operators rely on many third parties to build and maintain their infrastructure and sell and market their services. In many cases, these third parties can be seen to represent the mobile operator. As a buyer of products and services, mobile operators have influence and leverage to push for suppliers to align to their policies on child rights and demand these suppliers do the same with their own suppliers. Increasingly, legislative requirements are being introduced to make sure that global companies understand risks within their supply chain and among their business partners and can demonstrate action to manage them.

- At minimum, the company has in place a global code of conduct for suppliers that is publicly available, and covers a wide range of issues, including:
  - Compliance with health, safety, environmental, labour and anti-corruption laws and standards, in line with the company's own internal policies on these issues.
  - Specific sections on human rights and children's rights, particularly employment policies and benefits for parents and caregivers, child safeguarding, prohibition of child labour, minimum age, treatment and requirements for young workers, and required controls (see section 3).
  - Specific requirements for suppliers to have family-friendly policies in place, including coverage related to paid parental leave, pregnancy and maternity protection, breastfeeding support and in accordance with ILO Conventions that prohibit discrimination against workers with family responsibilities and young workers (age discrimination) (see section 3).

Further action: Supplier code of conduct requirements are built into legally binding contract conditions with business partners and suppliers and the company has management systems in place to monitor and support their implementation.

Guidance: Making the requirements of the supplier code of conduct contractually binding sends a clear message of their importance.

- Legal contracts with suppliers include: a requirement to comply with standards set out in the supplier code of conduct; rights to assess and audit the supplier's management of the issues it identifies; and allowing unannounced audits at supplier premises. However, business partners and suppliers should also be supported to meet these standards through adequate management systems, training, capacity building, incentive structures, and other initiatives (see 5.8 below).
- The contract also outlines the actions the company can undertake if suppliers are found to be in breach of these requirements.

5.2 TRAINING PROCUREMENT STAFF ON THE SUPPLIER CODE OF CONDUCT

Baseline expectation: The supplier code of conduct is communicated to all procurement teams and easily available on internal websites. Training programs are provided for managers, procurement staff, and other employees who buy products and services. These programs include child rights considerations.

Guidance: It is important that procurement staff are aware of the requirements of the supplier code of conduct, so they can proactively raise issues with suppliers from the beginning of the relationship and assess potential risks in different use cases.

- The policy and training are visibly supported by the most senior procurement staff to underscore the importance of the topic.
- Training covers overall supplier requirements as well as other parts of the responsible supply chain program, such as selection, monitoring, and supplier engagement.
- The training covers guidance to recognize and address child rights concerns, including employment policies and benefits for parents/caregivers; what procurement categories are high risk in terms of child rights violations; what forms of child rights violations are most prevalent for mobile operators; and how to spot 'red flags' for child rights and decent work violations in the company's different locations of operation.

The United Nations Global Compact's *Decent Work Toolkit for Sustainable Procurement* includes a section on training for procurement staff, including training exercises.

Further action: Participation of procurement personnel in supplier code of conduct training is tracked and reported as part of the company's sustainability reporting.

Guidance: Setting targets and reporting the completion rates of procurement training is a way for the company to demonstrate to external audiences that it is taking proactive steps to manage risks in its supply chain.

- Training participation of procurement personnel is recorded.
- Managers are incentivized with targets for training completion for their employees as part of their performance targets to promote a rights-based approach.

5.3 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 child labour and other relevant children's rights considerations including employment policies and benefits for parents and caregivers.

Guidance:

At minimum, suppliers are made aware of the supplier code of conduct in the tendering phase and that they may be assessed or audited for their compliance.

- The company supplier selection process includes criteria relating to the issues raised in the supplier code of conduct, including prohibition of child labour and decent work for parents and caregivers. Prequalification may include steps such as filling in a self-assessment questionnaire. The results of this questionnaire form part of the overall supplier qualification score.

- If the supplier otherwise meets selection status but some gaps are identified, an eventual contract includes an action plan requiring the supplier to close the gaps within a reasonable timeframe to avoid contractual penalties.

- If significant non-compliance with the company's selection criteria is found, particularly relating to child labour; discriminatory practices against women; or violations of employment policies and benefits for parents/caregivers, the supplier will not be considered for future tenders. If this happens, the company informs the supplier that the selection criteria were not met, specifies why they were not met, and encourages the supplier to demonstrate compliance and reapply.

Guidance on how to communicate with suppliers and solve dilemmas can be found in United Nations Global Compact's *Decent Work Toolkit for Sustainable Procurement*.

Further action: The company's contract conditions and supplier code of conduct are reviewed periodically to ensure that children's rights expectations are up to date and continually improved.

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

5.4 IDENTIFYING HIGH-RISK SUPPLIER CATEGORIES

Baseline expectation: The company has identified which supplier categories pose highest risks for severe child rights violations (e.g. discrimination on the basis of pregnancy and the worst forms of child labour, including hazardous work, trafficking, sexual exploitation, debt bondage and forced labour in the supply chain). This information is used to prioritize training to relevant category managers, and the company requires additional due diligence or assessments and reporting for suppliers within these categories.

Guidance:

- The company assesses the most important risks for each supplier category, including an evaluation of the risk, scale and extent of children's rights impacts in the supply chain. Additional monitoring of the expectations of suppliers can be put in place to reduce the risk of children's rights violations.

Further action: The company takes part in collaborative industry initiatives to improve supply chain management to maximize collective influence in addressing child rights-related issues with suppliers.

Guidance: There are several initiatives that support a collaborative approach to improved practices among shared suppliers and which attempt to jointly tackle challenging issues.

Examples include: the Joint Audit Cooperation and the Responsible Business Alliance.

5.5 MONITORING SUPPLIERS

Baseline expectation: The company's supplier monitoring activities include regular monitoring of compliance with the supplier code of conduct through self-assessments, with the aim of continually improving performance. Monitoring cases of child labour and other child exploitation concerns are part of these processes.

Guidance: As a first step, companies should build an understanding of the level of performance of suppliers in managing key risk areas, such as child labour, gender discrimination, and other decent work deficits that impact children, through supplier self-assessments. For new suppliers this should be done in the qualification phase.

- The self-assessments cover the scope of issues outlined in the Supplier code of conduct. These self-assessments can be designed, distributed and scored in-house, or the company can choose to use third-party platforms dedicated to responsible supply chain management for this purpose.

- In supplier categories where high child rights risks have been identified, management of these issues is given priority in the company's social and environmental assessments.

Further action: The company has established an on-site supply chain auditing program that takes into account country- and industry-specific issues, including those related to children's rights.

Guidance:

- Regular on-site audits of suppliers are conducted either by company staff or external auditors in the case of high risk suppliers. This may be done as part of collaborative cross-industry approaches (see 5.4). These audits include evaluation of any evidence of decent work and child rights violations including, but not restricted to, child labour in the supply chain. In supplier categories where high child rights risks have been identified, management of these issues is given priority in the audit corrective actions.

5.6 GRIEVANCE MECHANISM (REPORTING VIOLATIONS)

Baseline expectation: The company's grievance mechanisms are open to external parties, including suppliers, and/or the supplier code of conduct requests suppliers to have their own channels and processes in place for receiving, processing, investigating, and responding to complaints related to risks to and impacts on children's rights.

Guidance: Grievance mechanisms can include anonymous whistle-blowing channels, customer service channels or other dedicated ways to collect feedback, concerns, and any allegations of misconduct from all stakeholders.

- The company informs employees, community members, suppliers, service providers, workers in the supply chain, and other stakeholders about the grievance mechanisms and available channels to report violations of the company's supplier code of conduct, including any issues relating to child labour and exploitation.
- The mechanisms are effective and accessible to children and those who can report incidents on their behalf, such as community members, local NGOs, and government officials. Providing in-person support services through an NGO and offering a free phone hotline or other channels for reporting incidents can be effective. The chosen approach takes illiteracy and local languages into consideration.

See further details of effective grievance mechanisms in section 1.2 as well as Chapter 1: Introduction - 'Grievance mechanisms and access to remedy'.

Additional guidance on child-sensitive grievance mechanisms is available in the UNICEF discussion paper on Operational-level Grievance Mechanisms Fit for Children.

Further action: The company's audit processes include ways to receive confidential feedback directly from workers, and these include issues relating to child labour and exploitation.

Guidance:

The company is making efforts to collect feedback confidentially on issues covered in the supplier code of conduct, in a way that does not endanger the employee and their employment status. This can be done through surveys on mobile devices, online, over the telephone or through interviews directly with workers and third parties. Information relating to child labour, child exploitation, treatment of pregnant employees, and other violations of decent work standards for parents and caregivers should be covered in these efforts.

5.7 CORRECTIVE ACTIONS AND REMEDIATION

Baseline expectation: When suppliers fall short of requirements in self-assessments and on-site audits, the company has a clearly defined plan for follow-up to improve compliance.

Guidance: To create positive change and make sure practices are improved, companies need to engage with suppliers on the results of assessments and audits and support them to implement improvement measures.

- Where non-compliance or gaps are identified in self-assessments and on-site audits, the company communicates clear corrective action plans to the supplier to improve their compliance. The supplier is expected to action these within a specific timeframe, and with goals that are specific, measurable, attainable, relevant, and timely.
- The company follows up on the completion of these action plans and repeats self-assessments and on-site audits within an agreed timeframe.
- If suppliers are not willing or able to improve performance and close gaps in self- assessments, the company engages directly with them to see how it can support them in implementing solutions, including engaging in on-site audits where risks are deemed high.
- If child labour or exploitation is found in on-site audits, the company works with the supplier 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 (see section 3.1.2 for more details).
- Before an underage worker is dismissed from employment, the company has defined a remediation process, such as help 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.
- The remediation process takes into account 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/caregivers, schools, government agencies, and local NGOs and international child rights organizations to find the best solution.

Further action: The company has defined what further action it will take with suppliers that do not adequately respond to the corrective action plans and who fail to address issues found.

Guidance: The company has clearly defined its process for determining corrective action plans for suppliers and, if so required, the need to delist/deselect suppliers that do not adequately respond to these audits.

- The company has pre-empted these scenarios within its contracting (see section 5.1) and is in a position to enact penalties contractually on suppliers who are in violation of its supplier code of conduct, which can range from monetary penalties to suspension of work.
- Suppliers who do not respond or fail to demonstrate good will to improve their management of risks are blacklisted from further tenders.
- Company supplier management systems and tools allow for suppliers to be flagged to share this knowledge across the organization.

5.8 SUPPLIER CAPACITY AND CAPABILITY BUILDING

Baseline expectation: The company proactively works in partnership with suppliers to help minimize non-compliance; for example, through training, awareness-raising, and improved monitoring systems. Child rights-related issues are included in these efforts.

Guidance: Suppliers in some countries or small- and medium-sized suppliers may not have all the policies and processes required by the supplier code of conduct. Supplier capacity and capability building efforts may, in many cases, be a more effective way to improve supplier performance than self-assessments and audits. These efforts can also be delivered through cross-industry collaborative initiatives.

- The company improves supplier's capacity and capability to handle child rights risks through classroom or online training, or workshops to help suppliers manage risks and put in place policies and processes.
- Sustainability and child rights topics are included on the agenda of supplier days and other regular supplier engagement and follow-up activities.

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: There are different ways companies can incentivize suppliers to invest in better risk management and consider their own way of doing business and how this may be exacerbating or creating risk in the value chain.

- The company has put in place supplier rewards for good sustainability performance; awards or other incentives specific to the area of sustainability and/or code of conduct implementation.
- The company engages directly with long-term high-risk suppliers to address shared risks and opportunities relating to children's rights.

Shift has produced guidance for companies to recognize business models that may create inherent human rights risks, see Shift: 'Business Model Red Flags; Is your business wired in ways that put people at risk?'

5.9 REPORTING

Baseline expectation: The company has defined key performance indicators for the different elements of its responsible supply chain approach, from supplier code of conduct implementation to employee training and supplier audits and grievance mechanisms. Targets have been set for these KPIs.

Guidance: Setting KPIs and measuring the effectiveness of different elements of the responsible supply chain approach is key for its follow-up, continued improvement, and overall success in driving improvements with suppliers. Metrics should include consideration of child labour and exploitation whenever relevant.

The company has metrics on its responsible supply chain program, which can include:

- Percentage of suppliers who have signed/acknowledged the supplier code of conduct.
- Percentage of supplier contracts that include the supplier code of conduct as a mandatory element.
- Percentage of procurement personnel trained in the supplier code of conduct.
- Number (or percentage) of suppliers who have completed self-assessments against the supplier code of conduct.
- Percentage of supplier spend covered by suppliers assessed through self-assessments against the supplier code of conduct.
- Number of suppliers requiring corrective action plans.
- Number of corrective actions needed by type in the supplier self-assessments.
- Average self-assessment score of suppliers.
- Number of on-site supplier audits carried out.
- Number of audit findings and corrective action plans requested by type.
- Number (or percentage) of suppliers trained in the supplier code of conduct.
- Number of suppliers participating in capacity building initiatives.
- Number of suppliers engaged specifically on child rights.
- Number of suppliers who have implemented specific child rights-related improvements.
- Number of reports of violations received through grievance channels by type.

Further action: The company publicly communicates about the implementation of its responsible supply chain program and reports performance against the supplier code of conduct, including children's rights violations and remedies.

Guidance:
- The company communicates publicly on how it manages risks relating to child rights issues covered in its supplier code of conduct.
- This can include information about the supplier code of conduct; how it is implemented and enforced with suppliers; information about supplier self-assessments and audits and their results; information about grievance mechanisms and reports received; and transparency regarding any violations and how the company has dealt with them.
- This information is readily available on the company website, supplier centre, or published as part of annual sustainability reporting. The company makes public some or most of the indicators it follows internally as well as its targets and progress in meeting them.
- Guidance for reporting on adherence to the supplier code of conduct can be found in UNICEF's 'Children's Rights in Sustainability Reporting' and the GRI 'G4 Standards'.

5.10 CONFLICT MINERALS AND SUPPLIERS IN CONFLICT ZONES

Baseline expectation: Suppliers are required to demonstrate the sourcing of raw materials used in 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 products is not financing armed conflict.

Guidance: Mining of some metals and minerals used in mobile network equipment and devices has been linked to armed conflict in some countries by financially benefiting armed groups. It has also been linked to abuses such as child and forced labour and child soldiers.
- The company has adopted a public, company-wide policy for the supply chain of minerals originating from conflict-affected and high-risk areas. The policy does not simply ban minerals from such areas but actively supports responsible sourcing through robust, internationally recognized schemes.
- The company works with suppliers to improve traceability of minerals and identify and assess risk in their supply chains.
- Conflict minerals is an issue that no one company can solve on its own and requires collaboration between companies and their suppliers. The company takes part in existing industry initiatives to maximize collective influence in addressing child rights-related issues.

The OECD 'Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas' provides internationally accepted guidance for managing this issue.

Further action: The company's procurement policy and process address the heightened risk of human rights and child rights violations when suppliers are operating in conflict zones.

Guidance:
- The company assesses or reassess the company's and suppliers' impact on children in conflict situations as part of heightened attention to due diligence. For this, the company can 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 may need to be strengthened to make sure that children's rights and labour standards are rigorously applied in locations affected by conflict. Companies should also be alert to the increased risk of trafficking for labour or sexual exploitation of children who have been separated from their families.

5.11 ELECTRONIC WASTE MANAGEMENT

Baseline expectation: The company has a responsible electronic waste management system to ensure that e-waste is only passed to, or sold to, certified suppliers that have robust systems in place to treat any hazardous chemicals and materials responsibly and make sure that child labour is not used.

Guidance: E-waste is an area where the risk of child labour may be high in some countries, as children are brought in to take apart obsolete devices and extract precious metals for reselling. This type of work may also result in exposure to dangerous chemicals or substances, making it unsuitable work for anyone under the age of 18.
- The company carries out due diligence of its e-waste suppliers and partners who they sell or pass e-waste to. This includes being aware of whether these suppliers plan to export the waste to other countries where risks may be higher.

6 NETWORK OPERATIONS

6.1 NETWORK EXPANSION AND DEPLOYMENT

Baseline expectation: The company has a policy on community impacts relating to network deployment and site acquisition, which can include impacts on the environment, land rights as well as natural resource use. This policy takes into account children's specific vulnerabilities and rights when evaluating the siting of, and securing access to, base station sites, making sure that children are unlikely to gain access to dangerous equipment or towers.

Guidance:
- In network deployment, the company considers how the siting of the network towers and antennas could impact children, including through impacts on the environment, land rights, and access to natural resources.
- When planning, constructing, and operating sites, the company process considers their proximity to homes, schools or other areas where children are likely to be.
- Sites are fenced or additionally guarded, including during construction, 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, tower companies, contractors and subcontractors, and uses its influence to develop their respect for children's rights through contractual requirements, advocacy, dialogue, and training.

6.2 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, the company applies international standards for land and property inheritance to prevent children, and especially girls, from losing inheritance and property rights.
- The community consultations consider how the land use and related construction may affect family access to, and sourcing of, food and water.
- In community consultations, the company addresses any concerns parents or caregivers may have for their children's well-being or health.
- If any families need to be relocated due to network deployment, steps are taken 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 facilitates, and local transport. 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 make sure that children can enrol in school in their new location.

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

Guidance: Access to connectivity and power can improve lives in disadvantaged communities, for example, by providing (and/or improving) access to technology in community infrastructure such as schools, hospitals, and local government.
- The company identifies and provides opportunities to positively improve disadvantaged community members' lives through, for example, the provision of excess power from the site to the community, or other initiatives to support these communities to take advantage of connectivity.

6.3 IMPACTS OF NETWORK MAINTENANCE

Baseline expectation: The company's network maintenance processes include monitoring of environmental and community impacts, including potential and actual impacts on families and children. Network maintenance includes regularly checking the EMF emission levels of base station sites to ensure these operate within safety limits set by the *ICNIRP*.

Guidance:
- Network maintenance visits include assessment of any environmental impacts of the site on the surrounding environment (e.g. from the use of fuel); assessment of site safety; and good condition of access controls (such as fencing).
- Reporting from network maintenance visits allows employees to record and communicate any feedback from the community on any new concerns.
- Children and their specific vulnerabilities to resource scarcity, pollution, and toxicity are considered in environmental and health impact assessments.
- Regular EMF checks are carried out by equipment vendors, network maintenance teams, tower companies or managed services providers maintaining sites.

6.4 GRIEVANCE MECHANISMS AND ACCESS TO REMEDY FOR IMPACTED COMMUNITIES

Baseline expectation: With regard to network deployment and base station operations, the company has in place clearly communicated channels and mechanisms to receive, process, investigate, and respond to any complaints from impacted communities, including children.

Guidance: Communities that live around planned and existing base station sites should be able to easily and directly contact the company and voice any concerns or complaints they may have regarding the site and its operations. Where deployment or maintenance of sites is outsourced, the company should make sure that the business partner can provide such grievance mechanisms or that processes are in place for them to be forwarded to the company.

- The company informs employees, community members, suppliers, service providers, and other stakeholders about the grievance mechanisms and available channels to report risks to, or impacts on, children, including issues related to natural resource use, acquisition, and resettlement that relate to network deployment and operations.

- The mechanisms are effective and accessible to children and those who can report incidents on their behalf, such community members, local NGOs and government officials.

See further details of effective grievance mechanisms in section 1.2. Additional guidance on child-sensitive grievance mechanisms is available in the UNICEF discussion paper on Operational-level Grievance Mechanisms Fit for Children.

7 SECURITY

7.1 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. The policy incorporates respect for children's rights and prohibits the use of children in security arrangements.

Guidance: Work in security services is unsuitable to anyone under the age of 18 (e.g. due to handling of weapons or working hours). Security services will encounter children during their work and should be especially trained to understand how to handle these encounters.

- Policies regarding security specifically refer to human rights and 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 18 should not be engaged for security purposes, and should not be used by the security provider for any other tasks – including food preparation, logistics, administration and espionage.
- 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.
- A strict code of conduct is outlined regarding the use of force and against physical punishment or child abuse by security personnel, and describes the disciplinary proceedings against any security personnel who have perpetrated such abuse.
- Where security arrangements are provided by third parties, the above are contractually required from the third-party provider.

Further action: A process is in place to identify, assess, and monitor risks to, and impacts on, children's rights related to security arrangements.

Guidance: The company has conducted a risk assessment to understand the potential for violating human rights, including the rights of children, through the use of security services who are guarding corporate offices, personnel and assets such as base station sites and data centres (among others). Risks may be heightened in areas of conflict or where organized crime is prevalent. 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. When possible, this should be done in consultation with the wider community rather than relying solely on official records.
- Rule of law, considering the local prosecuting authority and judiciary capacity to hold those who are responsible for human rights abuses accountable.

7.2 TRAINING OF SECURITY PERSONNEL IN USE OF FORCE AND TREATMENT OF CHILDREN

Baseline expectation: Security personnel, whether direct employees, contractors or suppliers' employees, or suppliers, receive training on the company's security policy, children's rights and child protection, including use of force and treatment of children in interactions with security personnel.

Guidance:
- Training for security personnel includes common scenarios in which violations against children might take place, and the procedures they should follow in order to avoid such violations. It describes the legal consequences of infringements, for both the company and the security provider.
- The training emphasizes respect for children's rights and the necessity of enforcing child protection measures, and includes 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.

7.3 CONSIDERING CHILDREN IN EMERGENCIES AND BUSINESS CONTINUITY MANAGEMENT

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 children in the community.

Guidance: Children are a vulnerable group in any emergency or disaster and their safety should be considered in the company's planning for such situations. Children to consider may be employees, children of employees, or children in the company's wider value chain (e.g. children in communities, as customers, or employed by suppliers).

- Special considerations on children and their rights are included within the company disaster and emergency preparedness planning. This can include:
  - The needs of young workers, employees with children and pregnant employees in vulnerability analyses; contingency planning; and during times of emergency, evacuation, and warning procedures and drills.
  - Identifying 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. This could include how the company can help State child protection with its services when appropriate – this was, for example, the case during the COVID-19 pandemic.

Further action: The company has a process in place to ensure it does not exacerbate discrimination and tensions between communities that are involved in conflict. Due diligence processes address the heightened risk of child rights violations during conflict.

Guidance: In conflict, it is especially important to make sure that the company's practices are transparent and non-discriminatory (on ethnic, religious, political affiliation, gender, disability and other grounds) in recruitment, occupation assignment, remuneration, training, promotions and retrenchment.

- In situations of social or armed conflicts, the company carries out constructive and regular engagement with a range of stakeholders to make sure it does not unintentionally benefit one group over another, as well as helping the company to build trust with all concerned parties where there is distrust and/or violence.
- The company assesses or re-evaluates its impact on children in conflict situations as part of heightened attention to due diligence. Depending on the company's business operations, monitoring systems may need to be strengthened to make sure that children's rights and labour standards are rigorously applied. Companies should also be alert to the increased risk of trafficking for labour or sexual exploitation of children who may have been separated from their families.

7.4 GRIEVANCE MECHANISM AND ACCESS TO REMEDY FOR SECURITY SERVICES

Baseline expectation: The company has in place clearly communicated channels and mechanisms to receive, process, investigate and respond to any complaints linked to the company's use of security services, and these are accessible to children and their families.

Guidance:
- The company informs employees, community members, suppliers, service providers, and other stakeholders about the grievance mechanisms and available channels to report risks to, or impacts on, children related to the use of security services.
- The mechanisms are effective and accessible to children and those who can report incidents on their behalf, such community members, local NGOs and government officials.

See further details of effective grievance mechanisms in section 1.2. Additional guidance on child-sensitive grievance mechanisms is available in the UNICEF discussion paper on Operational-level Grievance Mechanisms Fit for Children.

7.5 PRIVACY AND FREEDOM OF EXPRESSION DURING EMERGENCY SITUATIONS

Baseline expectation: Strategies are in place to anticipate, respond to, and minimize adverse impacts on privacy and freedom of expression – including those of children – where governments are believed to be using the company's products or services for illegitimate or political purposes, for example, when requesting service restrictions or requesting information about individuals.

Guidance: Mobile operators may, at times, receive orders from government authorities to shut down or restrict services on their networks. In many cases, these types of requests relate to some type of conflict or emergency situation. These service restriction orders may include blocking particular mobile or internet services or content, restricting data bandwidth; or degrading the quality of SMS or voice services. They are often referred to as network shutdowns or internet shutdowns.

- The company has processes in place to carefully evaluate the proportionality and legitimacy of government requests to restrict services or for user information. This can include ensuring that governments follow established domestic and international legal processes and standards related to any requests; confirming the legal basis and the specific nature of the request in writing from an authorised signatory of the government department making the request; interpreting the request in light of the above to minimize any negative effects on freedom of expression; being prepared to challenge the requests if they appear not to have a sound legal basis, are overbroad or inconsistent with standards in this area and the company considers that it has leverage to do so.
- The company carries out risk assessments to understand situations where such requests may happen; identify high risk countries; put in place processes to ensure legal reviews are carried out; and identify potential mitigation actions.

Further information can be found from the Global Network Initiative.

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

Guidance: Many stakeholders value transparency by mobile operators in cases where they have been requested to restrict their services, including what steps the company has taken to ensure the legitimacy of requests and what steps it has taken to minimize their impact. Of course, this transparency must consider any risks to personnel involved in these situations which are often very sensitive.

5. Appendix

FREQUENTLY ASKED QUESTIONS

Should we implement the MO-CRIA self-assessment tool if we haven't done a human rights impact assessment before?

Yes, absolutely. There is no reason not to start with child rights. In some cases, it may even be an easier place to begin understanding your human rights impacts.

How long does it take?

This depends on the approach you take. Companies have done the assessment in one to three weeks while others have taken several months. You could also complete a section at a time – or one market at a time.

Do you have to hire external experts to do the assessment?

Not necessarily. The MO-CRIA is designed as a self-assessment tool that can be done with in-house resources. However, if internal expertise on child rights is lacking, it may be advisable to involve external experts. Note also that consultation with external stakeholders is strongly encouraged (see more on Stakeholder Engagement on page 17).

Should this be done at Group or subsidiary level?

This is up to the company. If the company is a large Group, it makes sense to assess Group-level policies and controls, the home market and involve a representative sample of subsidiaries. These can be the largest markets in terms of revenue and customers, or higher risk markets.

Does MO-CRIA involve engaging with affected stakeholders and external experts?

Because MO-CRIA is a self-assessment tool, it does not itself require consultations with affected stakeholders and independent external experts. However, to increase the credibility of the MO-CRIA process, it is strongly encouraged that companies publish information about how they carried out MO-CRIA; how it was complemented by additional stakeholder consultations and input; what the assessment findings were; and what actions the company is implementing as a result.

ADDITIONAL TOOLS FOR COMPANIES

Children Are Everyone's Business: Workbook 2.0
UNICEF, 2014; available in English and Spanish

Children's Rights in Impact Assessments
UNICEF and Danish Institute for Human Rights, 2013; available in English, French and Spanish

Children's Rights in Policies and Codes of Conduct
UNICEF and Save the Children, 2013; available in English and Spanish

Children's Rights in Sustainability Reporting
UNICEF, 2013; available in English, French and Spanish

Engaging Stakeholders on Children's Rights
UNICEF, 2014