

Child Safeguarding Toolkit for Business

2026 Edition

ACKNOWLEDGEMENTS

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This guidance document has been drafted to engage companies and other stakeholders on child safeguarding in the context of business policies and practices. It does not offer a comprehensive or conclusive view of research findings or industry practices regarding any of the topics discussed.

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Introduction

All children, wherever they live and whatever their circumstances, have the right to be protected, nurtured, and free from all forms of violence, abuse, neglect, maltreatment, and exploitation as set out in the [United Nations Convention on the Rights of the Child](#).

Child safeguarding is a key component of responsible business practices and strategies, as every company whose employees or business partners engage with children has a legal and moral duty of care to do all it can to protect children from harm.

This toolkit is relevant for companies of all sizes, in all sectors, at all levels of maturity in addressing sustainability and corporate responsibility challenges. This toolkit will:

- Guide companies from all industries to identify potential safeguarding risks to children.
- Outline procedures for setting up child safeguarding policies and plans to keep children safe in all business activities.

Embedding child safeguarding in your business includes promoting a culture where all concerns about children are addressed, no matter how serious they seem. Building a strong culture that prioritizes keeping children safe is the heart of safeguarding in business.

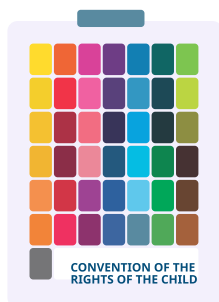


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What is child safeguarding?

All individuals under the age of 18, wherever they live and whatever their circumstances, have the right to be protected, nurtured, and free from all forms of violence, abuse, neglect, maltreatment, and exploitation as set out in the [United Nations Convention on the Rights of the Child](#). Respecting and supporting this right is the essence of child safeguarding in the context of business operations, activities and relationships.

Child safeguarding is the framework of policies, practices, and responsibilities aimed at promoting the welfare of children and preventing harm – whether physical, emotional, sexual, or neglect-related. It refers to all the actions a company takes to keep children they come into contact with safe, and prevent harm of children by employees and other persons who a company is responsible for. This may include contractors, business partners, visitors to premises, and volunteers.

Child safeguarding considers the risk that organisations, and companies present to children, including:

Prevention: Proactive measures to ensure all business activities are safe for children, building policies and guidelines, communicating safeguarding responsibilities to all employees and building reporting processes.

Response: the actions a company needs to take in response to a particular risk or concern

about a particular child or children in order to protect them from further harm.

It is essential that all types of contact with children are considered as a safeguarding risk. This includes situations where an employee has direct in-person or online contact with a child, access to their data, and/or is working with another company who have contact with children on their behalf.¹

Some companies use the words 'child safeguarding' and 'child protection' interchangeably. UNICEF defines child protection as the prevention of, and response to, exploitation, abuse, neglect, harmful practices, and violence against children in all settings - including family, community, and institutional contexts. This approach includes the programmes that strengthen families, communities, and government systems to create a protective environment for children.

Child Rights Due Diligence

Under the [United Nations Guiding Principles on Business and Human Rights](#) (UNGPs) and the [Children's Rights and Business Principles](#) (CRBPs), all companies have a responsibility to conduct due diligence to identify and manage the adverse human rights impacts, including child rights. This includes any safeguarding risks to children.

As part of a company's Child Rights Due Diligence (CRDD), specific child safeguarding concerns may be identified, prompting the development of a safeguarding programme. In other cases, a company may proactively establish such a programme outside of a formal due diligence process – particularly when its business model involves contact with children, or when the behavior of its personnel creates risks to children. This responsibility extends throughout the company's value chain.

¹ For UNICEF, safeguarding is about preventing and responding to risks that our own organisation presents to children.

Child rights due diligence in relation to the digital environment

As digital technologies become an increasingly central part of children's daily lives, their rights must be respected, protected, and fulfilled in the digital environment. This means that all businesses engaging in digital activities have a responsibility to ensure that children are safe and supported online.

UNICEF has developed a suite of tools and resources to support companies in the implementation of child rights due diligence approaches in this context, including the following highlights:

- **Introduction to child rights due diligence in the digital world:** [Taking a child rights-based approach to implementing the UN Guiding Principles on Business and Human Rights in relation to the Digital Environment](#)
- **Conducting child rights impact assessments:** [D-CRIA Toolbox](#)
- **Communicating about child rights impacts:** [Corporate Disclosure Recommendations](#)

Child safeguarding in relation to addressing child labour

Child safeguarding and efforts to address child labour are closely related but have distinct responsibilities for business. While safeguarding focuses on preventing harm by individuals towards children in all interactions with a company, tackling child labour requires companies to adopt responsible policies and practices in line with broader human rights due diligence and to consider the systemic conditions that place children at risk (see [UNICEF's Guidance Note on Child Labour and Responsible Business Conduct, 2022](#)). Both robust child safeguarding and tackling child labour should be part of a company's comprehensive child rights approach.

Why do businesses have a responsibility to keep children safe?

Article 19 of the [United Nations Convention on the Rights of the Child \(UNCRC\)](#) states that children have a right to be protected from all forms of abuse. It is the responsibility and duty of adults to protect children from harm, and respond in situations where children are at risk, or are particularly vulnerable. It is important to recognise the power imbalances between children and adults, and between businesses and children.

Child abuse includes all forms of physical and emotional ill-treatment, sexual abuse, neglect or negligent treatment, and commercial or other exploitation resulting in actual or potential harm to the child's health, survival, development, or dignity in the context of a relationship of responsibility, trust, or power.

The impacts of abuse on a child's physical, mental and emotional health can be severe and long lasting. [Estimates produced by UNICEF \(2024\)](#) suggest child abuse remains globally prevalent.

The global nature and scale of child abuse and maltreatment combined with growing recognition of the role business plays in society has led to increased acknowledgement that businesses have a responsibility to respect children's rights throughout their corporate activities and relationships, and also play a role in promoting the wellbeing of children.

- Most companies, their employees or affiliates come into contact with children at some point during the course of business, and may cause harm to children if they fail to adequately identify and address this risk.

Harm can occur in multiple ways as it relates to companies, including, but not limited to the examples:

Physical abuse, including company employees hitting a child while at work as a means of control or punishment.

Sexual abuse, including sexual activity with a child below 18 years, irrespective of local country definitions of when a child reaches adulthood. This could include a company employee downloading child sexual abuse images on their computer.

Commercial exploitation, including employees engaging in commercial sexual exploitation of children, or a situation where a company is using children as unpaid promoters of commercial content.

Online abuse, including grooming or online bullying, exposure to inappropriate content or contact through for example online platforms or video games, or inadequate data protection.

Emotional abuse or ill-treatment, including repeatedly conveying to a child that they are worthless or inadequate, such as an employee making hurtful or discriminatory statements to a child.

Neglect, which includes inadequate care or supervision, or not giving access to appropriate medical care or treatment to a child when it is needed. A company's employment policies can unintentionally result in children being neglected, for example, rigid working conditions could mean that parents are not able to take their children to the doctor, or children are left at home alone.

Some organisations and companies including UNICEF, as outlined in [UNICEF's Policy on Safeguarding](#), have determined that safeguarding should include harmful practices linked to the personal conduct of employees. This may include situations where an employee hires children for domestic or other work that interferes with their education or negatively affects their development, including child household servants or the worst forms of child labour. Harmful practices also include employees entering into marriage or a similar union with a child, or engaging in female genital mutilation/cutting, amputations, bindings, scarring, burning, branding and violent or degrading initiation rites.

Since abuse occurs in many different forms, all companies should have a zero-tolerance policy stating that no abuse or cause of harm towards children is allowed in any form. Principles of equality and non-discrimination should be included in these policies, stating that all children have equal right to protection regardless of any personal characteristic, including their age, gender, ability, culture, racial origin, religious belief, and sexual identity.

It is important to note that certain forms of abuse disproportionately affect specific groups of children. This may include girls, children with disabilities, children who are LGBTIQ+, children living in vulnerable situations, children in armed conflict, migrant, asylum-seeking, and refugee children, unaccompanied children, children in street situations, children affected by natural disasters, and children in institutional and alternative forms of residential care.

Companies may also involve young people aged 18-24 in activities such as internships,

mentoring, and work experience. While this age group is not legally defined as children, many of the same safeguarding risks still apply. Companies should therefore put appropriate safeguarding arrangements in place for this age group.

This Child Safeguarding Toolkit for Business is informed by the practical experiences of companies that have established child safeguarding policies and programmes, as well as the ongoing work of UNICEF in developing guidance on responsible business conduct.

Throughout this document, the words 'companies', 'businesses', and 'organisations' may be used interchangeably.

Principles and Guidance

Principles outlining the corporate responsibility to respect child rights are the:

[United Nations Guiding Principles on Business and Human Rights](#) (UNGPs): outlines key steps companies should take to 'know and show' respect for human rights; and the

[Children's Rights and Business Principles](#): builds on the UNGPs by providing guidance on the actions companies can take to respect and support children's rights in the workplace, marketplace and community.

[UNICEF's Children's Rights in Impact Assessment](#): provides useful guidance for companies seeking to integrate a child rights lens into their formal risk assessment process.

What harm may occur to children if companies don't take child safeguarding seriously?

CASE SCENARIOS OF CHILD SAFEGUARDING IN BUSINESS

CASE STUDY: AIRLINE SETTLES CASE ALLEGING PILOT'S ABUSE OF CHILDREN

A case centred on the actions of a pilot who allegedly abused 38 children over a ten-year period while volunteering at company-sponsored schools and orphanages in Kenya and Uganda. The prosecution argued that the company could be held vicariously liable for the pilot's actions and that the airline had a duty of care for the children abused in company-sponsored orphanages. The airline agreed to the settlement but still denied liability.

Lawyers for the victims responded, "This settlement should send a message to organizations which send their employees to work or volunteer with children. They need to ensure proper safeguards are in place to prevent such horrific acts."

Lessons learned: If the airline had an effective safeguarding programme in place, including appropriate recruitment, training, and procedures for engagement and reporting structures, this abuse could have been prevented. With a stronger understanding of the safeguarding risks, the pilot might never have been introduced to these children.

CASE STUDY: AN EMPLOYEE COMMUNICATES WITH CHILDREN THROUGH AN APP CHAT CREATED BY THEIR COMPANY.

A food company created a games app that children could access. The game collected personal data about users, including children, without adequate safeguards.

A company employee began conversations with children through the chat function, asking for photographs and details about their lives. These chats led to children sharing and receiving sexualised images.

Lesson learned: The employee had not signed any commitment to keep children safe throughout their work. If the company had understood the risks to children present in their activities, it would have been aware that employees could speak to children through the app. The company could have addressed these risks by asking colleagues to agree to a code of conduct or receive safeguarding training.

Developing a child safeguarding programme

Developing an effective child safeguarding programme includes five key steps:

1 Step	Conduct a child safeguarding risk assessment that reveals the ways in which employees and partners acting on behalf of the company come into contact with children.
2 Step	Conduct a gap analysis of existing policies, processes, and governance structures and develop additional structures and guidance to fill relevant gaps in safeguarding children.
3 Step	Develop a policy commitment that outlines your company's commitment to keep children safe from abuse and maltreatment by its employees and partners acting on its behalf.
4 Step	Develop an implementation plan to meet the commitments outlined in the safeguarding policy.
5 Step	Establish a reporting structure for safeguarding concerns and support employees to take action when they identify a concern.

As part of developing a comprehensive programme, a company that regularly comes into contact with children should seek safeguarding expertise. This may include creating a role to manage the company's safeguarding activities. The child safeguarding policy commitment and implementation plan that follows from this process must complement, reinforce, and cross-reference existing company and staff policies.

Step 1. Risk assessment

Carrying out an assessment is the first step to understanding the risks your business activities might pose to children's safety and wellbeing. This includes through any interaction with the company, its employees or its representatives. The safeguarding risk assessment can be a stand-alone process, or may be integrated into existing risk management processes. The goal of this assessment is to identify all contact that individuals in your company have with children as part of their job responsibilities, and to consider the potential risks of each type of contact.

These questions can act as a guide to understand where the areas with the highest potential risk or impact exist. This includes:

1. What contact does your company have with children as part of its business operations?

- What is the type of activity and where does this contact occur?
 - List all types of activity where contact with children occurs (e.g. face-to-face, online, handling children's data, or images/video).
- Who is involved in this activity?
 - List all of the roles involved in this contact, and include the details, such as business unit, specific position/type of employee, contractor, partner acting on behalf of your company or volunteer.

2. What is the frequency of this engagement with children?

3. Does contact with children require or allow employees or representatives to be alone with children? If so, how?

4. What are the potential risks to children due to that contact?

By answering these questions, your company will be able to identify opportunities for contact its employees or representatives have with children and determine the level of risk for each. A template for the risk assessment is provided in Annex I.

Follow-up assessments should be conducted when new business opportunities, projects, or campaigns are launched to evaluate the potential for new risks and consider ways to mitigate those risks.



It is important to recognize that serious abuse and violence is more likely to occur if small concerning behaviors are not addressed and become normalized over time.

Examples of potential risks include:

Example of contact	Example of a potential risk to children	Risk Mitigation
Marketing activities that require engagement with children	A toy company employee may upset a child actor while producing a commercial featuring their company's product	Ensuring children are never left alone with only one employee, listening to their needs during the commercial filming
Receiving a child safeguarding concern	A young person calls a customer service line reporting abuse by a company employee, but the operator does not know how to report the incident, so it is not addressed	Training and support for employees in specific roles, clearly communicate escalation processes
Commercial venues that offer entertainment and leisure activities for children or young people	A theme park employee makes repeated discriminatory remarks to a child because of their ethnicity	Inclusion embedded in safeguarding training and understanding children who are more at risk of abuse. No tolerance to discrimination clearly communicated by the company
Marketing through social media platforms	Children are encouraged to repost or share an advertisement on social media without considering privacy settings	Involving children safely in the development of marketing campaigns, embedding strong safeguards for child data
Having access to sensitive child data	An insurance company representative mishandles children's data and shares their personal information to a third party without consent	Develop a clear framework on who accesses what data and why, with heightened safeguards for child data
Volunteering with charities for children on behalf of your company	An employee shouts at a child during a corporate volunteer mentoring day	Safeguarding in recruitment and training for volunteers, clear codes of conduct, not leaving volunteers alone with a child
Sales to children	A retail associate in a clothing store may watch a child undress in a changing room	Retail associates receive training and understand how to help a child while maintaining safe boundaries

Providing care for a child or young person	An airline flight attendant uses physical force to control a child while responsible for the child's safety	Specific safeguarding training for specific roles involving care and responsibility for children
Using a third party to collect children's images	Hiring a company who take photos or videos that are used in an undignified way or with identifying information about the child that fails to respect her or his right to privacy or leads to the child being targeted for abuse	Child safeguarding in imagery training, layers of approval, seeking consent from children and their families before taking pictures
Communicating with children or young people through online platforms	An employee makes a connection with children through direct messages on your company's video game platform to abuse them (grooming)	Design the app so that adults cannot have private conversations with children through the platform and develop a clear code of conduct so employees understand the expected standards of behaviour
Interacting with children living in or nearby company premises	A construction company started a project in a community and set up a camp for workers, which led to increased cases of child sexual abuse in the area	A clear no tolerance to abuse statement in policy and a clear code of conduct so employees understand the expected standards of behaviour even when not working
Travelling on behalf of your company to places where child sexual exploitation is known to be prevalent	A corporate employee solicits children for sexual exploitation while on business travel	Develop a clear code of conduct so employees understand the expected standards of behaviour even when not working

Annex I. Child safeguarding risk assessment template

Type of activity (Example)	Relevant? (Yes/ No)	Level of risk? (High/ Medium/ Low)	Which adults are involved in this activity?			Which adults have responsibility for supervising the children?			What guides your practice in this area?			
			Company employees, interns or volunteers	Company contractors	Company business partners	Caregiver (e.g., parent, guardian, teacher)	Company staff	Company representatives	Written policy, procedure or guideline (provide name of the policy)	Unwritten procedures	No policies, procedures, or good practice	
Carrying out direct sales to children												
Having access to sensitive child data.												
Conducting activities that require engagement with children (marketing, focus groups)												
Interacting with children, who live in or near your company premises.												
Volunteering with child charities on behalf of your company												
Providing care for the child/young person												
Providing an 'immersive experience' for children/young people												
Communicating with children/young people through online platforms.												
Travelling on behalf of your company to places where child sexual exploitation is a concern.												
Other												

Step 2. Gap analysis

The next step is to conduct a gap analysis to map the relevant policies and processes already in place. This enables your business to understand the extent to which child safeguarding has already been integrated into its risk management approach. A best practice gap analysis includes two phases:

Review current legal and regulatory statutes, including a benchmark of legislation related to child safeguarding, protection, and abuse. This includes the degree to which existing corporate policies and practices meet national legal frameworks in every country your company operates in.

Assess management practices that provide additional safeguards beyond legal compliance. This should include a review of:

- existing policies, strategies and practices, across your company where child safeguarding could and should be added
- guidance for high-risk positions where there is more contact with children or their data
- the content of codes of conduct, and how these policies and practices are communicated to individuals who are required to sign these (employees, contractors).

Gap Analysis: Questions

1. What are the legal requirements for safeguarding and protecting children in the countries where you operate?

The United Nations Convention on the Rights of the Child (UNCRC) has been ratified by 196 countries, making it the most widely ratified human rights treaty in history. In addition, many countries have incorporated aspects of child safeguarding into national legislation, and most countries have laws prohibiting child abuse and child sexual exploitation. If there is a conflict between national legislation and

international standards, the standard that most protects the child should be followed.

2. How are you ensuring that you are meeting your safeguarding responsibilities in practice?

Your company should seek to understand how each listed activity involving contact with children is currently managed. This should cover all aspects of internal and external business activities and relations. For example:

- Does your company have a governance structure to manage its approach to child safeguarding? How is safeguarding owned, understood and championed at the senior leadership level within the organization?
- Are child safeguarding practices included in your company's employee or vendor code of conduct, or as a stand-alone policy?
- Does your company take adequate measures to ensure safe recruitment practices, for example, conducting background checks for all employees who will have contact with children?
- Is training on child safeguarding provided to all employees, and is additional or specific content provided for employees or partners who have contact with children as part of their typical responsibilities?
- Is a process in place to report and respond to child safeguarding concerns raised by employees and third parties?
- Does your company promote a culture of accountability where reported concerns are taken seriously, immediate actions are taken to minimize any additional risk, and whistle-blowers are protected?

Annex II. Gap analysis template

Legal and regulatory statutes

Companies should ask: *What are the legal requirements upon us with regard to safeguarding children we come into contact with through our work, in the countries in which we operate?*

	Legal requirements (list relevant laws)	Regulatory requirements (list relevant statutes)	Is your company in compliance with these requirements?
Country A:			
Country B:			
Country C:			

Management practices

Companies should ask: *How are we ensuring that we are meeting our safeguarding responsibilities in practice?*

Governance	Does your company have a governance structure to manage your company's approach to child safeguarding?	
	How is safeguarding owned and understood at the senior leadership level within the organization?	
Policy	Does your company have a stand-alone child safeguarding policy?	
	Does your company include child safeguarding practices in its employee or vendor code of conduct?	
	What expectations regarding child safeguarding are placed on business partners?	
Management	Does your company take adequate measures to ensure safe recruitment practices, e.g., conducting background checks for all employees who will have engagement with children?	
	Does your company provide training on child safeguarding to all employees and additional content for employees or partners who have contact with children as part of their responsibilities?	
	Does your company have a process to report and respond to child safeguarding concerns raised by employees and third parties?	

Step 3. Policy commitment

A child safeguarding policy sets out your company's commitment to keep children safe and articulates what will be done to protect children from harm and respond to concerns.

The policy, as well as any additional guidance should be tailored for your company's need and situation. Defining the best suited scope and format for a child safeguarding policy will be different for each company and may take the format of:

- **A stand-alone safeguarding policy and code of conduct**

When a company chooses to develop a stand-alone child safeguarding policy, the document should clearly state its commitment to safeguard children from any harm. This policy should be brief, clear and practical to ensure it will be read and utilized by employees and management to guide decision making and employee conduct. More detailed guidance on how safeguarding risks are managed may be included throughout the relevant business activities.

- **Integrating safeguarding into existing policies (e.g. whistleblowing practices) to include conduct related to safeguarding children**

For some companies, their codes already cover appropriate conduct for employees as it relates to children. As part of the policy development process, the original code of conduct should also be updated to better provide guidance on conduct related specifically to safeguarding children.

The policy, procedure, and code of conduct may be produced in various formats and translated into relevant languages to ensure it is understood and communicated to all relevant stakeholders and business relationships.

When developing the child safeguarding policy, companies should seek to include the points outlined in the checklist.



Annex III. Child safeguarding policy checklist

Policy item	Description of corporate commitment
<p>Statement of commitment</p>	<p><input type="checkbox"/> Outline why child safeguarding is important to your company, and how your company will meet this commitment and its safeguarding responsibilities. This may include references to corporate values, national laws, and international human rights standards, as well as proactive measures for risk management.</p>
<p>Risks related to child safeguarding and statement of equality</p>	<p><input type="checkbox"/> Outline in broad terms the ways in which your company could pose a risk to children’s safety and well-being, as determined through the risk assessment. Provide tangible examples of the impact your company may have on children, so that employees and partners can fully grasp risks. Include a statement of equal treatment and identify children who have an increased risk of being negatively impacted by your company’s activities.</p>
<p>Definitions</p>	<p><input type="checkbox"/> To ensure a common understanding, the commitment should define the following terms:</p> <p>Child – any individual under the age of 18, as defined by the UNCRC, regardless of whether the national age of majority is lower.</p> <p>Child abuse – includes all forms of physical and/ or emotional ill-treatment, sexual abuse, neglect or negligent treatment or commercial or other exploitation, resulting in actual or potential harm to the child’s health, survival, development or dignity.</p> <p>Child safeguarding – the framework of policies, practices, and responsibilities aimed at promoting the welfare of children and preventing harm – whether physical, emotional, sexual, or neglect-related. It refers to all the actions a company takes to keep children they come into contact with safe and prevent harm of children by employees and other persons who a company is responsible for.</p> <p>Child protection – the prevention of, and response to, exploitation, abuse, neglect, harmful practices, and violence against children in all settings - including family, community, and institutional contexts.</p>

Policy item	Description of corporate commitment
Applicability of commitment	<input type="checkbox"/> Clarify that the commitment covers all employees and other persons acting on behalf of your company and applies to all aspects of your company’s operations and business relationships where children are potentially impacted. Reinforce that safeguarding is everyone’s responsibility and that everyone covered is required to adhere to the commitment. Explain how the safeguarding commitment links to other company policies and procedures, for example, the code of ethical conduct.
Acknowledgment of the duty of care and other legal responsibilities	<input type="checkbox"/> Outline your company’s duty of care, other legal responsibilities, and commitment to safeguard children and its zero-tolerance approach to child abuse. Include information on the consequences associated with a breach of commitment, for example, penalties, fines or employment-related actions. Where applicable, link the commitment to national legislation in support of child safeguarding.
Governance structure	<input type="checkbox"/> Name the function or individual within your company that has ultimate responsibility for implementation of the commitment, as well as the ‘corporate sponsor’ or executive assigned to oversee the commitment.
Reporting structure	<input type="checkbox"/> Outline the process for internal and external stakeholders to raise concerns regarding the safety and security of children in relation to company operations; this is typically the contact of the person or function responsible for receiving concerns, and may be made available as part of the existing company whistle-blower mechanisms.
CEO or chairman of the board approval	<input type="checkbox"/> The commitment should be signed off at the highest level of your company, by either the CEO and/or the board. This signals to employees, partners, and external stakeholders the commitment’s importance to the company. Key messages around expectations for keeping children safe should be regularly emphasized by senior management after the launch of the commitment.

CASE STUDY: A PETROL COMPANY COMMITS TO PROTECT CHILDREN ON THE COUNTRY'S ROADS.

A petrol company in South America signed a commitment with tanker truck suppliers to strengthen the protection of children and adolescents on the country's roads. The commitment recognised the prevalence of child sexual exploitation in communities along the roads. Its response was to promote spaces for reflection and training among employees and collaborators, incorporate child safeguarding into internal policies, and develop and sign codes of conduct with staff, spelling out the zero-tolerance policy against sexual exploitation.

The company committed to develop actions to identify high-risk areas on the roads and report cases, in coordination with the relevant entities, and generate content and materials to build their company capacity to identify and prevent child sexual exploitation.



CASE STUDY: IMPLEMENTING A ZERO-TOLERANCE POLICY AGAINST SEXUAL EXPLOITATION

When a mining company commenced work in Eastern Africa, employment opportunities attracted large groups of workers who were away from home and had money to spend. Against a background of poverty and girls leaving school early, prevalence of sexual exploitation increased.

The company took the issue of child sexual exploitation very seriously and invested time to explore and address the problem to determine how it could best protect children.

This included:

1. Instituting a zero-tolerance code of conduct for all its workers. Employees are now expected to sign the policy annually, with adherence to the code is mandatory for all national and expatriate staff.
2. Setting up a task force to monitor implementation of the policy, including reporting and whistle-blowing mechanisms, with any misconduct now resulting in immediate sanctions.
3. Working with key actors from local community networks, so any cases of abuse or exploitation are reported or referred to child safeguarding focal points in the community.

Step 4. Create and roll out an implementation plan

A clear implementation plan ensures your company's safeguarding commitments are operational. To ensure that safeguarding is a priority throughout the organization, it is crucial to have senior management take ownership and continuously support the implementation process. This also helps your company mitigate for potential reputational risks related to child safeguarding issues that may surface in the future.

This chapter will cover implementation related to:

- Governance structures
- Human resources
- Awareness-raising and training

Governance

Developing a governance structure in support of the policy and ensuring senior management and ownership is an essential aspect of embedding safeguarding. A trained designated child safeguarding lead should be appointed, to ensure that there is expertise and resources put into safeguarding work.

Governance of child safeguarding can be integrated into existing structures or may stand alone. Both models require that the individuals who have safeguarding responsibility within the organization have an appropriate level of knowledge and expertise. If your company has a chief risk officer or risk council tasked with addressing a broad range of risks, adding child safeguarding to their mandate can be an efficient and effective way to elevate accountability for the issue. This approach could be appropriate for companies with little contact with children.

Companies with a significant amount of contact between employees and children may require a designated safeguarding lead, nominated safeguarding committee, and a stand-alone

governance model due to the higher levels of safeguarding risk. The safeguarding committee, preferably cross-organizational with representatives from relevant business units, ensures accountability and shared decision making when a concern is reported to the designated safeguarding lead. Together with the safeguarding committee, the designated safeguarding lead would be tasked with operationalizing the child safeguarding policy and would be responsible for responding to safeguarding concerns.

In addition to a governing body, it can be helpful to establish a network of child safeguarding leads across your business. These leads would:

- Provide staff and partners with guidance and support as the first line of contact in high-risk business units,
- Receive safeguarding concerns and escalate them to the designated safeguarding lead.

The designated safeguarding lead would support this group of leads to receive training and resources to help embed child safeguarding across the business, in addition to their regular roles.

Depending on the country context, it could also be useful to establish an agreement with a local non-governmental organization that works on child rights and protection issues. This organization could support and advise your company on the more complex issues that might come up and provide referrals to support services for children who have been harmed.

Human Resources

The human resources department has an essential role in making sure that child safeguarding is integrated into company processes, management structures, and a company culture that prioritises child safeguarding.

Ensuring recruitment practices that focus on children's safety and wellbeing is an effective way to prevent and minimize risks. Consider the following elements when developing recruitment practices:

1. Planning and advertising. Communicate expectations for your company's commitment to child safeguarding. For example, include a link to your company's child safeguarding policy in the job notice.

2. Application form and self-disclosure. For applicants who will be in contact with children or their data (paid or voluntary), consider using a self-declaration form consenting to a background check and highlighting any instances of arrest or criminal prosecution. At minimum, the self-declaration form should include the candidate's consent to a criminal records check or background check certificate, as appropriate. The specific questions it includes should align with the relevant legislation in each country of operation.

3. Interviews. Values-based interview techniques can help determine a candidate's attitudes, perceptions, and behaviour towards children. If the job specifically involves working with children, the interview questions would be adapted and expanded to determine the candidate's specific suitability. The following questions could be used to determine a candidate's attitudes towards child safeguarding:

- What do you understand by child safeguarding?
- Have you ever had any training on child safeguarding?

- Have you ever had concerns about a child? If so, what did you do?
- What would you do if you had concerns about a colleague with regard to their behaviour or attitudes when interacting with children?
- Have you previously worked with children in either a paid or voluntary capacity? If so, what are the main reasons that led you to want to work with children?

It may not be essential for candidates to have an advanced knowledge in safeguarding, but these questions will help to understand the candidate's attitude towards safeguarding and their response to taking on safeguarding responsibility.

4. References and background checks.

When the job requires contact with children, it is necessary to conduct background checks and acquire a criminal record certificate to reveal potential instances of child abuse. The process and legal requirements



of acquiring a criminal record check vary by country. While a criminal background does not necessarily preclude an individual from being hired, information that is disclosed through background checks will need to be risk-assessed to determine whether the individual poses potential harm to children. In addition to background checks, requiring at least two references can provide insight on the top candidates' former job performance with regard to child safeguarding. When their contract is signed, all employees should sign your company's child safeguarding policy, regardless of whether they will have contact with children as part of their job description. This policy sets the expectations for employees' conduct around children, clearly articulates the behaviour and actions that will not be tolerated, and outlines the consequences for failing to meet your company's expectations for child safeguarding.

5. Induction. Appropriate training for all new and existing employees will enable individuals to recognize their responsibilities with regard to their own jobs and the reporting of poor practices or concerns of possible abuse.

6. Monitoring and appraisal. Performance indicators related to child safeguarding should be integrated into existing monitoring and performance appraisal systems in order to ensure continuous accountability. This is especially important for higher-risk roles within different business units. There should also be company-wide key performance indicators or annual reporting that tracks the implementation and effectiveness of the zero-tolerance policy.

Awareness raising of safeguarding

Raising awareness and providing training for staff are key elements of the safeguarding journey and are essential

to protecting children throughout your company's activities. Ensuring that all employees – from facilities custodian to the CEO – are aware of your company's commitment and their corresponding responsibility is a vital step towards creating a safe and rights-aware culture. This aims to make sure that child safeguarding is embedded throughout every aspect of your business, and that everyone understands how to identify and respond to a safeguarding concern.

Awareness raising and training help to promote a culture in which all child safeguarding concerns are addressed and reported.

When one-off incidents such as an employee being alone with a child or making an inappropriate remark to a child are not addressed, there is greater risk of these poor practices recurring, becoming a 'normal' part of the corporate culture.

If the company is serious about building a safer culture, addressing poor practices sends a message that these practices are not acceptable. In accordance with your company's zero-tolerance policy, employees should be guided to report all abuse-related situations that are witnessed or suspected, including bullying, verbal abuse or insults.

Company-wide awareness raising can take many forms, and should be informed by the unique culture and approach to communications developed by the company. Communications can take place through regular in-person or digital communication activities and meetings, onboarding, integration into ethics or code of conduct training or a separate training on child safeguarding.

The goals of corporate-wide awareness raising are:

- To emphasize the importance of building a safe culture for children throughout all activities,
- Outline what child safeguarding risks exist for your company, and how staff and partners can spot concerns,
- Educate staff and partners on how to report child safeguarding concerns through your company's reporting structure.

It is important to recognise that this topic raises many feelings and emotions. Some

colleagues will feel overwhelmed thinking about child abuse, or feel it is not relevant to their work. It is important to prioritise sensitivity and wellbeing in discussions around child safeguarding, as some colleagues may have been personally impacted by abuse themselves.

Facilitators should be skilled in discussing the topic in a calm manner, without creating an atmosphere of mistrust or alarm, and be prepared to respond to individuals who experience distress and need additional support. This could involve having a trained staff counsellor present at the sessions, or preparing a list of referral services.

CASE STUDY: EMBARKING ON THE CHILD SAFEGUARDING JOURNEY – FROM POLICY DEVELOPMENT TO IMPLEMENTATION

A global consumer-goods company conducted a review looking at how its operations impacted children's rights and wellbeing. The initiative was led by the corporate responsibility team, with support from senior management and the corporate compliance board. Following the review, the company decided to work with a child rights expert to develop a new child safeguarding policy. This process involved conducting an internal risk assessment with various business units and obtaining policy commitment from senior management stakeholders, including the CEO.

One key lesson the company identified was that for their business, safeguarding practices work best when embedded in existing governance structures instead of creating new stand-alone mechanisms.

After launching the policy, the newly-developed implementation plan involved raising awareness of child safeguarding across the business, creating a company-wide online learning programme, and developing targeted training for employees who interact with children.

Strengthening Safeguarding Culture

Creating and strengthening a child safeguarding culture within your company should be a priority.

While the compliance aspect of safeguarding is important and policy, procedures, and implementation plans provide the foundation of safeguarding work, these policies will not be brought to life unless the organisation has a strong safeguarding culture.

If robust reporting policies are developed, but employees are not aware of them or do not feel confident to raise concerns or know whom to report them to, the policies will be ineffective.

Signs of a strong and positive safeguarding culture:

- Safeguarding is led and role-modelled by senior management
- Colleagues prioritise safeguarding training and engage in awareness raising programmes
- Colleagues proactively reach out to the safeguarding lead with questions and start risk assessing activities themselves
- Child rights and safeguarding messages are integrated into communications
- Safeguarding materials and resources are distributed and colleagues know where to find them
- Reporting mechanisms are clear and colleagues know how to use them
- There is a practice of continual learning and improving safeguarding activities

Safeguarding Training

For companies with more significant contact with children, tailored and specific training should be embedded into learning and development programmes, with specific training given to employees who engage with children as part of their work.

These employees may include those responsible for taking special care of children's well-being, for example flight attendants caring for children who are travelling alone, or colleagues working in retail, hospitality, and entertainment venues.

Targeted training aims to ensure these colleagues understand how their work could impact the safety and well-being of children, and train them to know how to act responsibly around children and make a report if they are concerned that a child may be at risk.

Targeted training sessions should be designed to provide in-depth detail on specific risks related to your business unit as well as specific actions employees should take to mitigate risks. Training topics should include:

Information about the child safeguarding policy and related policies and procedures.

Introduction to the policy and its content, where to find the policy and other relevant documents and who to turn to in case of questions related to the policy, e.g., the child safeguarding focal point/ HR.

Relevance of child safeguarding to your company.

The training should be informed by a specific list of child safeguarding risks identified, with a special focus on the risks



related to the specific business unit or position. Clear examples or scenarios of actual risks faced by your company should be included.

Employee responsibilities. Outline the specific actions employees should take to meet their responsibility to safeguard children as well as the consequences of non-compliance. This may include presenting child safeguarding case scenarios and outlining how employees should respond. Linking examples to issues employees face in their everyday work is an efficient way of engaging staff and raising employee awareness levels.

A clearly defined reporting process. Provide information on how employees can raise potential concerns regarding child safeguarding, and how those concerns are reviewed and taken forward. The training should include guidance on how to react if a child reports a concern directly to an employee.

Guidance for spotting risks. To support staff in spotting risks, and signs of harm, communications/training should include guidance on factors that increase children's vulnerability (gender, age, disabilities), and how perpetrators may seek to abuse or cause harm. Signs of harm may include:

- witnessing or hearing an inappropriate interaction between an adult and a child
- knowing of someone who is accessing or sharing child sexual abuse images
- seeing an employee use physical force with a child
- hearing an employee demean or degrade a child
- observing a child who is exhibiting inappropriately sexualized behaviour.
- observing a child showing signs of neglect, such as withdrawn behaviour

Most children who experience abuse do not ask for help, so it is important for colleagues to be aware of the signs of harm and to be open and observant. Responding to a child must happen with a high degree of sensitivity and care.

In accordance with your company's zero-tolerance policy, all employees should be guided to report all abuse-related situations that are witnessed or suspected, including bullying, verbal abuse or insults. Underscore that one-time incidents, oversights or bad judgement calls (e.g., an employee being alone with a child or making an inappropriate remark) should be addressed to avoid these poor practices recurring and becoming ingrained in the corporate culture.

Companies conducting targeted training should invest in dynamic and actionable training for their employees. In some cases, this may also include business partners. Whether it is a combination of online and face-to-face training, or quizzes and assessments, ensuring that the training fits the corporate culture and relates to your company's child safeguarding risks will help ensure its success. As this topic can be sensitive, it is important to give colleagues space to process this information and spaces to ask follow up questions.

Discussing anonymized or fictional case study scenarios help to bring safeguarding risks to life and can be used in training and team meetings. Some examples are presented in the following table:

Sample scenarios for training resources:

Scenario	Is this a safeguarding risk?
A company employee contacts a 15-year-old on your company's consumer-facing online forum. She has some great ideas, so he invites her to have a private video call.	While the employee may genuinely wish to discuss the girl's ideas, there is potential here for developing a personal relationship and abusing the employee's position of power. Further, the staff member's actions cannot be accounted for.
An employee downloads child sexual abuse images on their work computer.	Viewing or possessing child sexual abuse images is classified as child abuse and is a criminal offence in many countries.
A company employee hosts groups of students on a study visit, and repeatedly tells discriminatory jokes about sexual orientation to the students.	Making jokes or using inappropriate language about certain characteristics of a person – including age, gender, ability, culture, racial origin, religious belief or sexual identity – is discriminatory and can convey a message to a child or a young adult that they are worthless or inadequate because of their identity. This is classified as emotional abuse. It is important to nourish a corporate culture in which discriminatory humour is not accepted.
During an overseas business trip, an employee joins a business partner for a drink at a nearby bar. At the bar, the employee is approached by someone who is around 16 years old offering sexual activity in exchange for money.	Engaging in commercial sexual activity with a child is child sexual exploitation, a form of abuse, and is a criminal offence in many countries. In cases where national legislation and international standards conflict, it is strongly recommended to prioritize the international standard.
A hotel employee invites a 15-year-old guest to meet after the workday ends.	This is a safeguarding risk because it provides an opportunity for the employee to be alone with the child. Further, the employee's actions cannot be accounted for.

CASE STUDY: TRAINING EMPLOYEES TO IDENTIFY AND REPORT CHILD ABUSE

An oil and gas company provided training to their extensive network of gas engineers to recognise signs of abuse and neglect in children, and to know how to get those children the support and help they need as soon as possible.

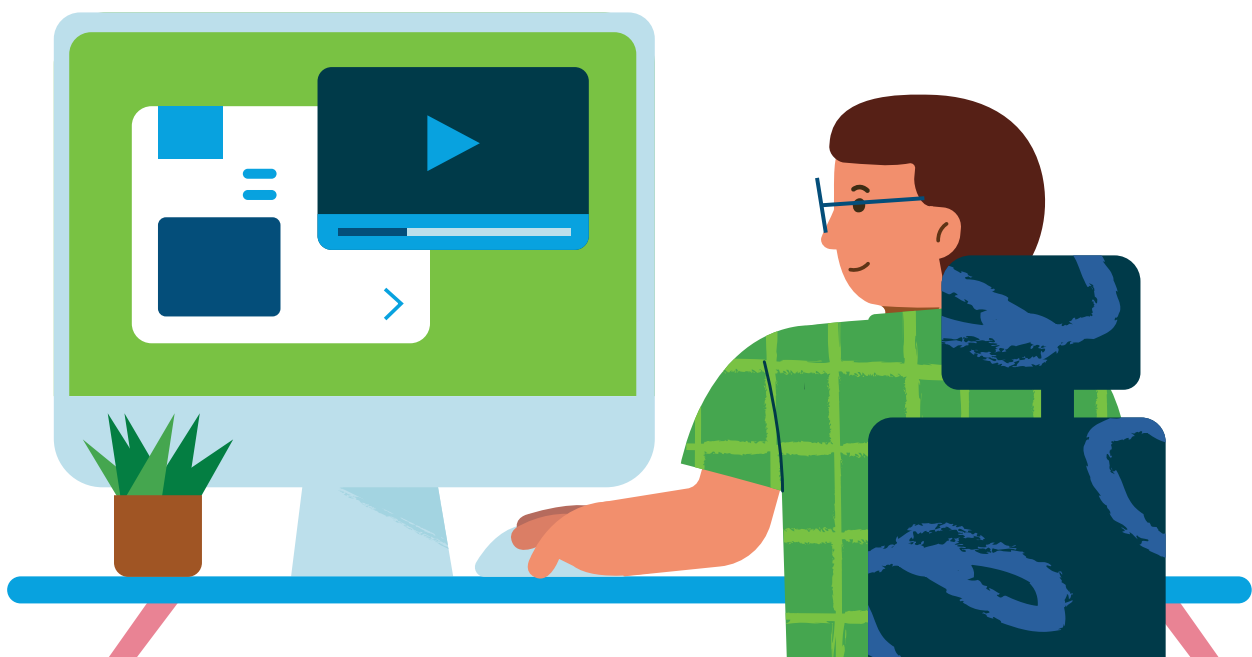
The company recognised that as part of their work, engineers go into family homes across the country on a daily-basis, and may interact with children who are at risk of neglect or abuse. The training supports these workers to feel confident that they would know how to report a concern they had about a child.

CASE STUDY: AWARENESS RAISING: CHILD ONLINE SAFETY

While developing its safeguarding policy, a global toy company developing online games for children conducted a risk assessment and a gap analysis of its work involving children.

To raise awareness among staff, an e-learning training was rolled out, with almost all employees completing this by the end of the first year. In addition, face-to-face training sessions were conducted for business units across different countries and employees with higher levels of contact with children.

With more company employees having higher awareness about child safeguarding, and following the launch of the policy, processes were implemented to ensure children, and their data are protected while using the company's digital products. By using automatically generated screen names and avatar profile pictures, children are able to engage in online communities without sharing identifiable information.



Step 5. Responding to and reporting concerns

Embedding robust safeguarding mechanisms into company policies and practices can significantly reduce the risk of harm, but harm to children may still occur. Increased awareness of safeguarding may lead to increased numbers of reported safeguarding concerns, therefore, processes must be in place to respond to any reported poor practice concerns as well as any serious safeguarding concerns.

Effective reporting structures build on existing company mechanisms such as whistle-blowing policies, but in some cases, it might be suitable to develop a stand-alone reporting structure. Either way, it is essential that the child safeguarding leads are trained in responding to concerns related to child safeguarding risks.

The most important message for companies to communicate to their employees is:

Any concerns that arise should always be reported. The employee should not be placed in a position of deciding whether or not abuse has taken place. What matters is that the concern is passed on to the right person so that action can be taken to protect and support the child.

A child-centred response

Your company should always prioritize the safety of the child. When it comes to responding to the concern, the focus should always be on the child's immediate safety and wellbeing. This includes communicating with the child in a way that is supportive and understanding.

It is also important to consider the company's legal obligations and its responsibilities to staff. To support this process, it can be useful to establish a relationship with a local non-governmental organization that works on child safety topics, so they can help with advice and referrals to support services.

Child safeguarding concerns should be responded to and documented in a

standardized and transparent way. Always make it clear that all information will be handled confidentially and only shared where the duty to protect a child from harm supersedes their right to privacy.

Responding to a child's concern

A child sharing a concern must always be taken seriously. However, most children who experience abuse do not tell anyone, or ask for help. Those working with children should receive training to report any child safeguarding concerns that they may identify, no matter how serious or less serious they seem.

If someone is concerned that a child is in immediate danger, they should immediately contact emergency services. They should also report it to the child safeguarding lead for follow up.

If a child shares information that suggests they are at risk or have been abused, it is important that the employee:

- Remains calm, and does not show shock or disbelief
- Tells the child that they will take what is said seriously
- Listens carefully to what is being said and offers comfort statements, particularly when a child discloses sexual abuse, for example, "I'm sorry this happened to you", "It's not your fault."
- Does not ask detailed, probing, or leading questions
- Explains what they are going to do. Depending on the child's age, this would include asking what type of help is wanted, and who the child feels comfortable having involved
- Tells the child that they cannot keep a secret that could cause harm, but the information will only be shared in order to keep them safe.

A source of additional guidance is [Caring for Child Survivors of Sexual Abuse in Humanitarian Settings \(2023\) a report by the International Rescue Committee and UNICEF.](#)

Supporting colleagues to take action when a report is raised

All employees need to know who their designated safeguarding lead is, and this person's duty to escalate concerns. Your company should also build a clear mechanism for individuals to report actual and potential safeguarding concerns about children, and communicate the structure for processing concerns, including:

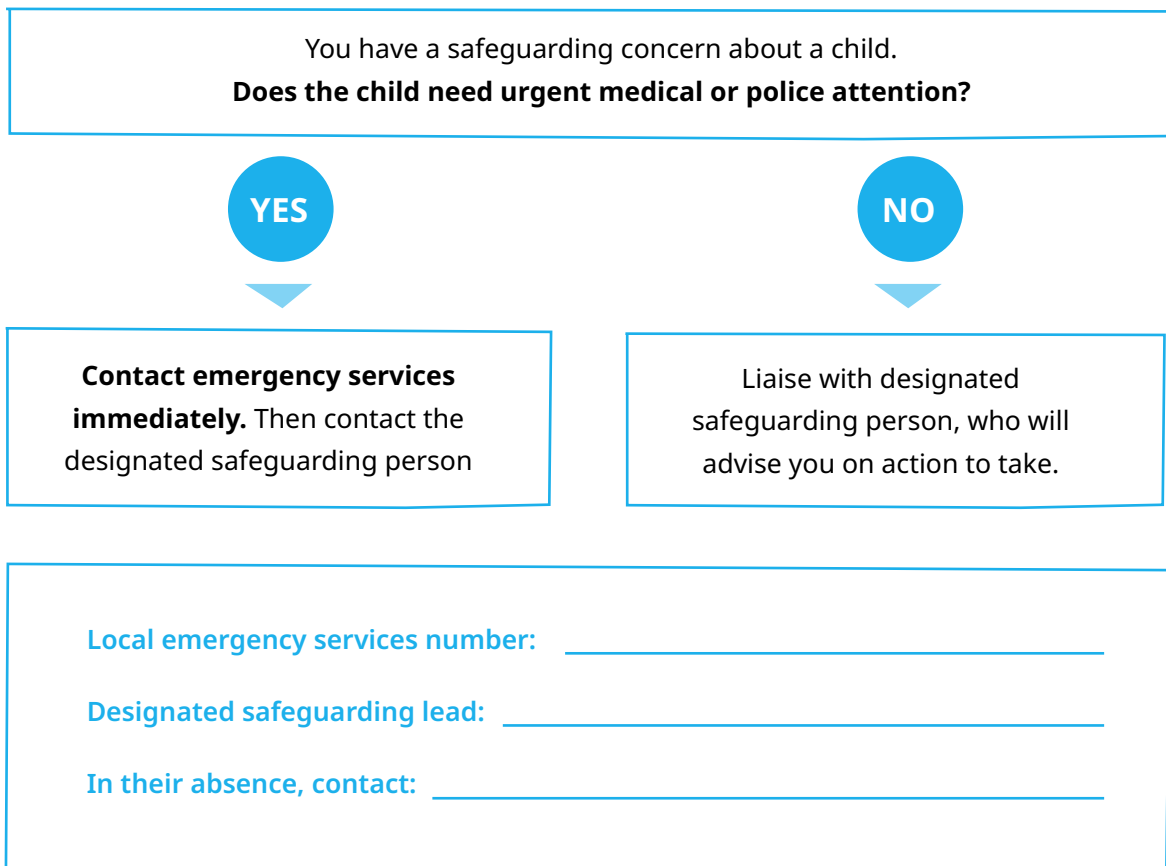
- When there is a concern about a child, how should an employee respond?
- How should the organization respond?
- Who is responsible for receiving the reported concerns?

- Who is responsible for the actions taken after receiving a report?
- What are the overarching principles behind the reporting system? For example, safety, anonymity, confidentiality, fairness?

Safeguarding concerns may arise and be reported to the safeguarding lead in a variety of ways, including:

- a report by a colleague or a member of the public
- information coming to light through safe recruitment processes
- statutory agencies making contact as part of an ongoing investigation.

Reporting safeguarding concerns - example flow chart for employees



Establishing a reporting structure to process concerns is very important. For the response and reporting process to work effectively, the following steps should be taken:

1. Make sure that all employees understand the role of the designated safeguarding lead, who this person is and how to contact them, as well as a deputy lead to be available if the lead is absent.
2. Contact the relevant local agencies and organizations and keep a directory of all contact information that is readily available should the safeguarding lead need to pass concerns on. At minimum, this should include the police, other statutory agencies, for example, social services, relevant charities, and support organizations, and information on how to contact country embassies.
3. Ensure there is an internal system in place for making safeguarding decisions. This may be a 'safeguarding committee', which would include individuals who can support the safeguarding lead in making decisions about the best course of action for any incidents as they arise. The group should include senior personnel, and have access to legal advice when it is needed. A contingency plan should be in place for situations where allegations or concerns involve someone from the safeguarding committee, for example, protecting the identity of the person who reported.
4. Develop a standard safeguarding incident form for recording the details of any concerns raised, and a system for storing this form securely and confidentially.

There may be some scenarios that require additional reporting processes, for example, policies for unattended and missing children

where there are events or general business practices involving children.

It is not the responsibility of the designated safeguarding lead or any other employee to decide whether or not abuse has taken place – their responsibility is to report information to appropriate agencies, so that concerns can be investigated. The welfare of the child or children involved must be the overarching consideration at all times. For additional guidance for the designated safeguarding lead, see Annex V.

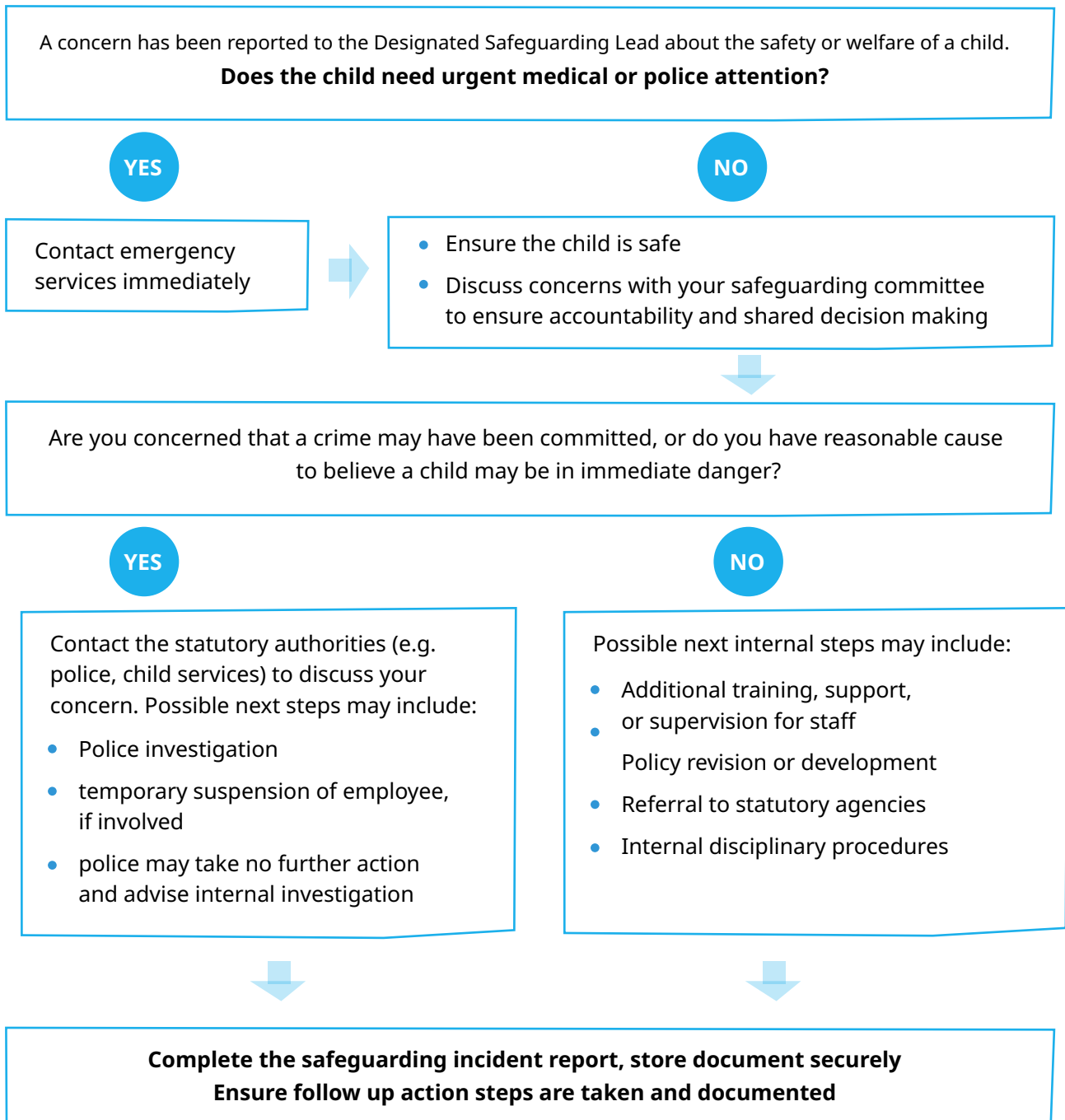
When a child safeguarding concern is raised, a safeguarding form must be completed and stored securely. Information can be continually added to the form as it arises, or when action steps are completed. All companies should monitor their progress, tracking the number of concerns received and processed, and regularly review cases to understand how and why the concern was raised, and how gaps can be filled through strengthening policy, guidance, training, or communication activities.

The 'Responding to Child Safeguarding Concerns Flow Chart' (Annex IV) offers an overview of steps to take and decisions to make after a concern is raised.



Annex IV. Responding to Child Safeguarding Concerns Flow Chart

Action steps for a designated safeguarding lead after a concern is raised



Annex V. Guidance for the Designated Child Safeguarding Lead when responding to a safeguarding concern about a child.

When you receive a safeguarding concern and immediate medical or police attention is required:

- Do not delay in contacting the appropriate medical or law-enforcement agencies to report your concern. Any delay in getting emergency help to the child could cause further harm. These agencies will advise you about the immediate next steps.
- In most countries, it is appropriate to contact the police when you are concerned that a crime has been committed. However, there may be some rare contexts where contacting the police would place the child at increased risk of harm. This must be decided at the local level, and you will need to determine which agency would be most appropriate to contact if you are advised against contacting the police in the first instance. It will be important to have previously addressed this item in your company policy and guidelines for the designated child safeguarding lead.

When immediate emergency assistance is not required:

- Ensure the child is safe and supported, that they are as comfortable as possible, for example, offer a glass of water, and a private/quiet place to sit with some age-appropriate toys or activities, and do not leave the child alone.
- Contact parents as soon as possible, unless they are implicated in involvement with the incident. In the case of possible parent/caregiver involvement, take advice from legal agencies on when to make contact with them.
- Attempt to minimize the number of strangers the child must interact with

and the number of times they are asked to retell the details of the incident.

- When a police investigation is required, the legal investigation will take precedence over any internal company enquiries. After contacting the police, take their advice on whether and how to proceed with an internal investigation.

Possible outcomes of investigations:

- When the concern is quickly resolved and staff are not implicated – for example, a child was thought to be missing and is quickly found – the outcome would be ‘no further action required’. This should nonetheless be recorded on a safeguarding incident form and stored securely.
- Investigations may lead to staff being identified as requiring additional training, support or supervision and/or may lead to the development of additional safeguarding policies or guidance.
- As an internal investigation progresses, information may come to light that increases the level of concern and may lead to a subsequent referral to statutory agencies.
- Internal investigations may also lead to disciplinary action when there is concern that staff have failed in their duty of care to children or to fulfil the requirements of their role. Safeguarding should be clearly referenced in disciplinary and appeals processes, and these processes should be cross-referenced in safeguarding policies.
- When a serious incident has occurred involving a child who is not in their home country, and you are concerned that further intervention may be required when they get home, you should contact their country’s embassy to report your concern.

For every incident that occurs, a safeguarding incident form or equivalent must be completed and stored securely and confidentially.

Conclusion

This document has presented five clear steps that your company can take to strengthen your child safeguarding processes and protect children who come into contact with your company's business activities. These steps include:



It is important to acknowledge that establishing and implementing child safeguarding policies and procedures is likely to raise the number of reports. This is an indicator that the safeguarding culture is being strengthened as employees are more aware of the issues and know whom to contact in cases of concern.

Successful child safeguarding in business operations and work practices is an ongoing journey that involves continuous review and revision of policies and implementation.

At the heart of the effort is a company culture that identifies child safeguarding as a business priority and recognizes that the responsibility of putting child safeguarding policies into practice lies with every individual involved in your company.

