



Company experience

ASSESSING THE IMPACT OF MOBILE NETWORK OPERATORS ON CHILDREN'S RIGHTS: THE MILLICOM EXPERIENCE



MILLICOM
THE DIGITAL LIFESTYLE

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Foreword

In 2012, UNICEF, Save the Children and the UN Global Compact, in dialogue with businesses, developed the Children's Rights and Business Principles (CRBP). These look at business operations through the perspective of impact on children. They pick up the UN "Protect, Respect and Remedy" Business and Human Rights Framework and translate it into what it means for children.

The CRBPs are a practical set of principles shining a light on both the positive role businesses can have on children's lives and on the considerable negative impact that business strategies and operations can have on children's survival and development. Among the many reasons why looking at business activity through a children's lens is necessary is that activities that do not impact the rights of adults can adversely impact the rights of a child. Impact on children is easily over-looked in due diligence processes framed around adults. Making visible the particular, often unforeseen or unrecognized, ways that businesses impact on children adds a new and important dimension to assessment of social impact and to the implementation of rights-respecting business policies and practices, contracts, operational guidelines, and reports to investors and other stakeholders.

With 2.2 billion children in the world—almost one-third of the world's population—businesses interact directly and indirectly with children on a daily basis. Many businesses are alive to the risk of child labour, and with some 168 million estimated children remaining trapped in child labour—many of them full time—this remains a concern. However, there are so many more forms of interaction and impact. Children play around the edges of industrial sites, they are consumers, and they are young workers. Impact on children can take place through product design, marketing and advertising, or staff interaction with children, through the employment conditions of parents and caregivers, the environmental impact of business operations and the economic and social impact of business activity on the community. However, the incorporation of children's rights into business policies and codes of conduct is still most often limited to the prevention of child labour or philanthropic investments.

Millicom is a company that has taken ownership of addressing its impact on children. It has recognized that the issues extend beyond child labour. It understands that business support for children is not merely about making grants, but has to start from within. It has embarked on a journey of reviewing and putting in place policies and systems aimed at preventing its own operations, supply chains, and products from having a negative impact on children. This process has involved investment in building capacity and raising awareness amongst its own staff, suppliers and business partners, customers, and policy makers.

The positive consequences of Millicom's child rights journey goes beyond its own (and suppliers and retailers) impact on children. While each company is to some extent unique, Millicom's journey represents a lesson for its peers and industry at large. Millicom demonstrates what both can be done if a company puts impact on children at the centre of its operational strategies and what needs to be done to achieve this.

I also like to think that what is good for children is good for business. There are a number of advantages a company can gain by integrating child rights considerations into its policies and processes, as demonstrated by the Millicom experience. They can achieve better risk management through an expanded definition of risk. They can obtain information about impact on child rights that can also serve as an early indicator or 'red flag' to a company of its broader human rights issues. They can retain customers, motivate employees and attract shareholder confidence. And last but not least, they can build trust and long-lasting relationships among wider communities.

I commend Millicom for taking leadership on child rights, for being transparent on its findings, learnings and areas for improvement. Above all, I commend them for recognizing that the job is never done and that this is a continuous work in progress. I encourage other companies to think carefully about what child rights means for them and hope that this report serves as an example for how to undertake or broaden their own child rights journey.



Andrew Mawson

Chief, Child Rights and Business, UNICEF

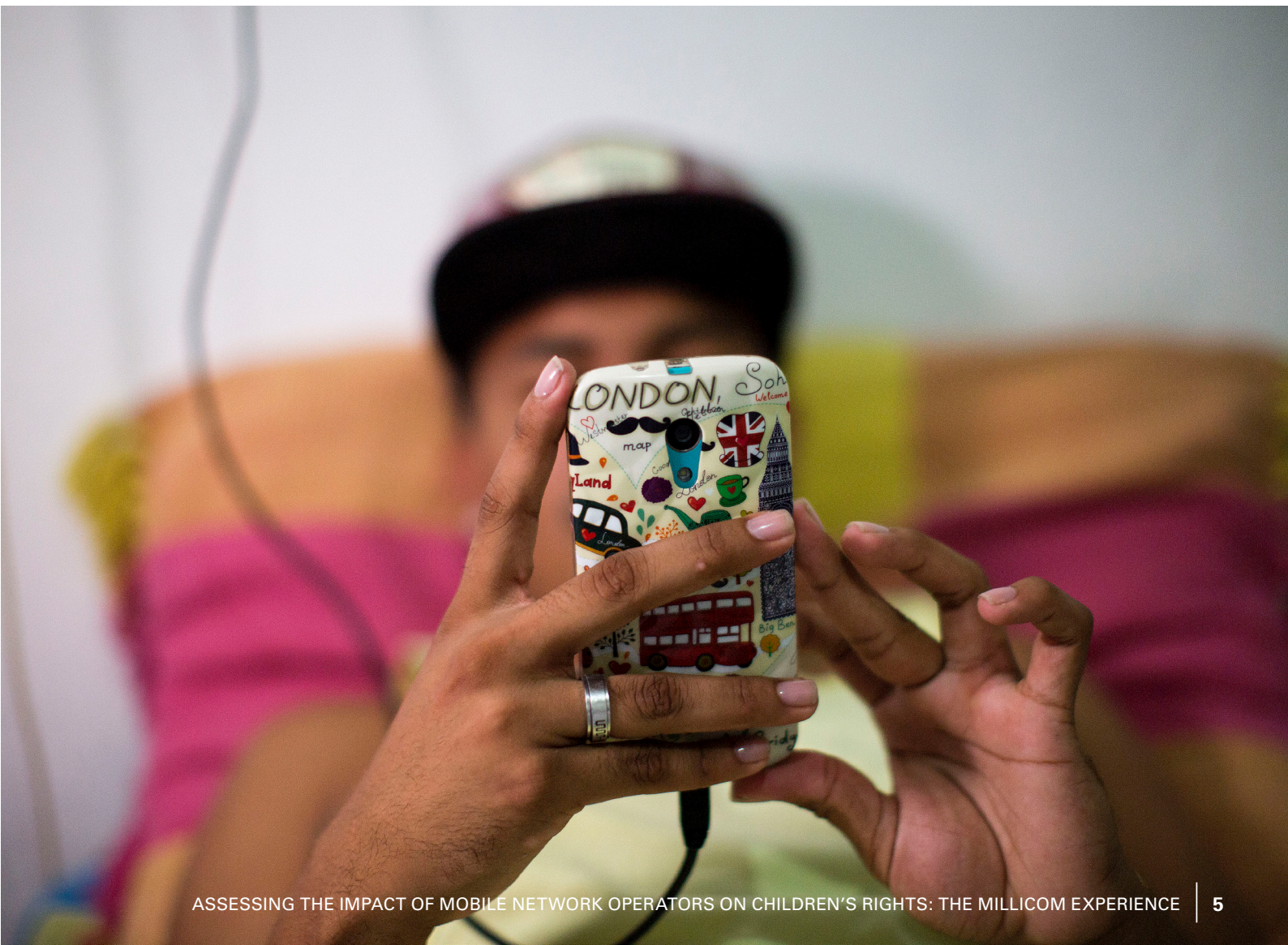
About this report

This report details the process Millicom undertook to carry out child rights assessments of its internal policies and processes. Millicom International Cellular SA is a leading provider of cable and mobile services dedicated to emerging markets in Latin America and Africa. It provides mobile services to more than 57 million customers, with a cable footprint of more than 8.1 million homes across 13 markets.

In 2012, Millicom and UNICEF partnered to map out the risks and opportunities facing the telecommunications sector with respect to children's rights. The aim of the partnership was to develop guidelines and tools for telecommunications companies to assess how their policies and processes might affect children's rights. Millicom piloted UNICEF's framework for assessing the company's impact on children's rights in the Democratic Republic of the Congo (DRC). The pilot led to joint work to develop the Children's Rights Assessment Tool specific to mobile network operators.

The tool allows mobile network operators to assess the impact their business operations may have on children's rights and helps them understand the challenges, opportunities and ways to mitigate potential negative impacts on children. Using the tool, mobile network operators can analyse the strengths and weaknesses of their policies and processes across their operations, from compliance to procurement, human resources and product development.

Millicom has applied the Children's Rights Assessment Tool in Bolivia, Colombia, El Salvador, Rwanda and Tanzania, and plans to deploy it in other countries where it operates. The results of the assessments have helped to refine Millicom's global corporate responsibility strategy and prioritize corporate responsibility programmes, and have led to action plans for children's rights in the ground.



Introduction

The Children's Rights and Business Principles, developed through a process led by UNICEF, Save the Children and the UN Global Compact, call on companies to respect children's rights, avoid infringing on the rights of children and address adverse business impacts on children's rights. The principles encourage companies to voluntarily support children's rights in their business operations, products and services through strategic social investments, advocacy and engagement in public policy, partnerships and other collective action.

Mobile network operators affect children in many ways, from employment practices, which affect parents and young workers, to operational procedures and how they develop, market and deliver products and services (Table 1). Companies can respect and support children's rights through the economic and social development that results from rolling out their services, from opening up access to communication via the Internet, and from developing relationships with business partners and key stakeholders.

Table 1. Risks and opportunities to children's rights enshrined in the Convention on the Rights of the Child (CRC) faced by mobile operators

Impact area	Opportunity or risk	CRC Article
Labour	Gender or parental discrimination	Articles 2, 5, 6, 24, 27, 28, 32, 36
	Child labour in supply chains and distribution channels	
	Working conditions for young workers	
	Vocational training for young people	
	Family-friendly conditions for parents	
Information and communication technology and development	Provision of mobile technology for users to access public services, such as finance, health, education, birth registration and other government services	Articles 8, 17, 28, 29, 31
	Access to the Internet and connectivity of homes and schools	
Marketing	Use of children in marketing materials	Articles 16, 36, 42
	Aggressive marketing or commercial practices	
Security arrangements	Security services interaction with children	Articles 19, 34, 36, 40
Health and safety	Exposure to harmful or hazardous electronic waste	Article 24
	Placement of cell towers and securing base station tower access	
Harmful content, conduct and contact online	Child sexual abuse material online	Articles 19, 28, 34
	Inappropriate online content and contact	
	Dangerous or inappropriate behaviour (sexting, cyberbullying)	
	Excessive Internet use	
Privacy and freedom of expression	Collection and retention of personal data	Articles 12, 13, 16, 17e, 34
	Overly restrictive parental controls	
	Permanence of information about children published on the Internet	

The Millicom business case for children's rights

Company profile

Millicom, a cable and mobile services company, operates in 13 markets in Latin America and Africa, offering traditional fixed and mobile telephony, Internet and cable TV services. The company also offers digital services such as mobile money and Tigo Music.

The issues relating to children's rights and Millicom's ability to mitigate risks to these rights vary among markets according to the degree of Internet penetration and number of customers, cultural norms, and the maturity and enforcement of local regulatory and legal frameworks. A clear challenge for child protection in all of Millicom's markets is that consumer protection laws permit only persons over 18 years of age to open a mobile phone account, Internet connection or cable TV subscription.

Millicom's ability to implement policies that respect children's rights is affected by the structure of subsidiary companies (Table 2). Most subsidiaries are fully owned by the Millicom Group, meaning that global policies approved by the Group's Executive Committee apply. Millicom retains management control of all of its subsidiaries but, in joint ventures, local boards approve policies. In Colombia, additional regulations apply as Millicom's joint-venture partner, EPM, is a public entity. The Government of Zanzibar has a minority stake in Millicom's Zantel operation in Tanzania.

Table 2. Countries hosting Millicom subsidiaries (2016)

Country (company)	Population	Customers (mobile)	Workforce (direct and indirect) ¹	Services	% ownership
Guatemala	16 300 000	9 468 000	4 000	Cable, mobile, mobile financial services (MFS) and business-to-business (B2B)	55
Honduras	8 600 000	4 848 000	2 500	Cable, mobile, MFS and B2B	66.6
El Salvador	6 400 000	3 213 000	1 400	Cable, mobile, MFS and B2B	100
Costa Rica	4 900 000	NA	700	Cable and B2B	100
Colombia	48 800 000	7 764 000	25 800	Cable, mobile, MFS and B2B	50% + 1 share
Paraguay	7 100 000	3,635 000	4 600	Cable, mobile, MFS and B2B	100
Bolivia	11 700 000	3 076 000	2 700	Cable, mobile, MFS and B2B	100
Chad	11 900 000	3 132 000	450	Mobile, MFS and B2B	100
Ghana ²	27 000 000	3 933 000	700	Mobile, MFS and B2B	100
Rwanda	11 600 000	2 966 000	300	Mobile, MFS and B2B	100
Senegal ³	15 100 000	3 646 000	300	Mobile, MFS and B2B	100
Tanzania (Tigo)	50 600 000	10 743 000	1 100	Mobile, MFS and B2B	100
Tanzania (Zantel)	50 600 000	988 000	200	Mobile, MFS and B2B	85

¹ Approximate, as of 31 December 2016.

² Millicom announced in March 2017 an agreement to combine its Ghana operations with those of Airtel.

³ Millicom announced in February 2017 the sale of its Senegal operation to Wari.

Business case

Respecting and supporting children's rights generate benefits for business in many ways. Among the most significant advantages to Millicom are opportunities to:

- **Improve risk management** by embracing a definition of risk that addresses environmental and social issues, including human rights, across business policies and processes in all operational and geographical areas. Consistency and integration of programmes across the Millicom Group, and at both ends of the value chain from procurement processes to distribution channels, can mitigate an extensive range of potential risks. Millicom can take special measures to mitigate risks to children's rights when operating in environments with a high incidence of child labour, a high ratio of youth to adults, a high rate of poverty, poor schooling and a weak legal system, and where the informal economy predominates.
- **Anticipate regulation and identify opportunities for self-regulation** by taking proactive approaches to potential risks relating to children's rights. Millicom can take measures such as: developing self-regulatory approaches; implementing policies and processes to mitigate risks (for example, voluntarily blocking child sexual abuse content) or enhance opportunities; implementing responsible marketing that takes account of the specific vulnerabilities of children; or making parental control available to customers.
- **Build brand reputation and help strengthen the 'social licence to operate'** by demonstrating that its products and positive relationships with local communities can have beneficial impacts and meet the needs of parents and children. For example, Millicom can expand opportunities for children to connect to Internet services that provide access to information and education, and meet other important needs. Harm to children from the unintended use of Internet services can be mitigated by, for example, educational programmes for children, teachers and caregivers about safety online.
- **Gaining and retaining customers** by demonstrating responsible and responsive company behaviour, increasing the number of customers looking to contract with responsible and ethical companies. On child rights, Millicom can offer solutions to customers to address concerns they may have, e.g. regarding safety of their children online, with educational materials and tools such as parental controls.
- **Recruit and retain a motivated workforce** by offering fair wages and decent working conditions that enable employees who are parents or caregivers to combine their family responsibilities with a productive work life, thereby increasing production and reducing absenteeism. Millicom can motivate employees by offering opportunities to volunteer that allow them to positively engage in communities and participate in company initiatives to tackle local social challenges.
- **Attract investor and shareholder confidence** by demonstrating that Millicom takes its environmental and social performance seriously. Environmental, social and governance indicators are increasingly used to measure company performance. Mainstream investors are reviewing companies' environmental, social and governance indicators and related risk management as a way of improving their own financial performance. By demonstrating that it has considered the impact of its core products and services on human and children's rights, Millicom can show that its senior leadership takes a long-term view of sustainability.

From child labour to children's rights

Millicom's focus on children's rights began with the common but narrow concern that most companies have when it comes to children: child labour. In 2012, Millicom management raised specific issues regarding the risks to children participating in the distribution of mobile pre-paid 'top-up' and SIM cards. Child labour was considered to be a highly material risk, as over 90 per cent of Millicom's over 57 million mobile customers use pre-paid plans. Customers regularly top up the balance of their mobile accounts, interacting almost daily with Millicom's local sales force. With hundreds of thousands of points of sale – from individual freelancers to family-run convenience stores – distribution is comparable to fast-moving consumer goods. Millicom management was thus concerned that, in addition to the common concerns of technology companies relating to the use of child labour in manufacturing electronic devices in their supply chains, there could be an even higher risk at the other end of their supply chains, in distribution.

Millicom sought external advice on how to address risks associated with child labour, contacting a number of stakeholders, including UNICEF, for their views on the best way to proceed. UNICEF recommended assessing the company's potential impact on children, both negative and positive, and not limiting the assessment to child labour. At this point, Millicom and UNICEF began collaborating to map the risks and opportunities for children for mobile network operators. They piloted an assessment of the industry's impact on children — beyond child labour — with an in-depth, on-site assessment in the Democratic Republic of the Congo (DRC).

The first child rights assessment

Millicom engaged an external consultancy – TwoTomorrows (now DNV GL, an international company that helps to advance the safety and sustainability of businesses) – to support a pilot assessment of the company's impact on child rights in the DRC. The six-month pilot assessment was based in part on tools for assessing children's rights that UNICEF had developed for industry. It had four components:

- Desk assessment of the telecom children's rights risk landscape
- Assessment of global policies and processes through document reviews and interviews
- Assessment of local policies and processes in the DRC
- Field study of the distribution of services in the DRC, in consultation with external stakeholders

Despite the initial concerns about child labour, the assessors found no evidence that this occurs in the company's DRC operations. They concluded that strong controls were in place, ranging from procedures for hiring sales staff to standards for collecting and storing proper documentation on proof of age. On-site observations and interviews with a number of children's rights organizations working in the country corroborated the findings; these organizations observed that, while child labour was endemic in informal agricultural or domestic work and could be found in other sectors, it was not a high risk for mobile network operators in the country.

Children's rights impacts beyond child labour

The assessment did however expose other potential issues affecting children's rights that Millicom had not initially considered:

- **Family-friendly workplace policies:** Company policies affect parents' and caregivers' abilities to raise and protect children, provide for them materially and emotionally, and enable their development. Family-friendly policies and benefits include decent working conditions; decent wages with statutory sick pay, overtime pay and social contributions; parental leave and flexible or part-time schedules for working parents; breastfeeding and child-care arrangements; and family health insurance.
- **Children's exposure to electronic waste:** Unless Millicom vets companies that buy its electronic waste, children may become involved in taking apart equipment, which not only may promote child labour, but also might expose children to dangerous substances.

- **Security services:** Millicom hires security services to guard personnel, shops and network tower and data centre facilities. These security services may not be aware of how to deal appropriately with under-age intruders.
- **Network deployment:** The construction, placement and security of network towers may have an impact on children. For example, towers should be placed an appropriate distance from schools, playgrounds or other locations frequented by children. During construction and after completion, tower sites should be adequately fenced and secured to prevent children from accessing dangerous electric equipment or to prevent them from climbing the towers. Millicom also has to ensure that suppliers take these considerations into account.
- **Children and the Internet:** In bringing Internet connectivity to markets, Millicom has a responsibility to ensure that children are empowered to participate in the digital world while protecting them from harm and abuse online. Information and communication technologies can provide children with unprecedented opportunities to learn, share, communicate and access information. Despite the profound benefits of the Internet, it also exposes children to risks, such as inappropriate content or contacts, or violation of their privacy.
- **Social investment:** Millicom could align its social investments with the specific children's rights issues that the company faces. Priority could be given to investments that have the potential to minimize risks or maximize opportunities to address children's rights, for example investments that support poverty alleviation in markets where there is a high risk of child labour in supply chains or distribution channels.
- **Marketing:** When featuring children in marketing materials, Millicom could ensure parental consent and prevent exposing children to marketing and advertising that could affect their rights or perpetuate gender stereotypes.

While the DRC assessment reassured Millicom with regard to the major perceived risk of child labour, it specifically pointed to the need to review how the company's global policies were applied in the countries where it operates and to investigate market-specific risks and opportunities for children's rights. Following the findings in the DRC, Millicom integrated a holistic programme on children's rights as one of the core pillars of its corporate responsibility strategy.

Millicom's corporate responsibility strategy and children's rights

In 2014, Millicom set a new corporate responsibility strategy covering five areas informed by a materiality analysis conducted through interviews with key stakeholders and senior management. Five-year plans direct action in each area of the strategy:

- **Diversity:** Focusing initially on improving gender diversity in senior management
- **Children's rights and online protection:** Assessing impacts on children's rights and protecting children online
- **Environmental protection:** Focusing on programmes to deal with electronic waste and conserve energy
- **Privacy and freedom of expression:** Protecting customer privacy and mitigating the impacts of government demands
- **Responsible supply chain:** Implementing a supplier code, supplier assessments and training suppliers

Children's rights are embedded in all five focus areas of Millicom's corporate responsibility strategy. On children's rights and online protection, Millicom began working in partnership with UNICEF to develop a tool to assess the impacts of mobile network operators on children's rights and to protect children online.

In the area of privacy and freedom of expression, Millicom participates in a UNICEF working group on 'children and privacy', which is identifying ways for the wider information and communications industry to respect children's rights. In the area of environmental protection, dealing with electronic waste is a priority, largely because of the risk it represents to child labour in Millicom's markets. The diversity programme's initial focus on gender diversity looks at family-friendly policies and improving inclusion, such as providing breastfeeding facilities in its main offices. Finally, a key area in the programme for ensuring responsible supply chains is preventing child labour.

Policies and codes of conduct

Millicom has a number of policies and codes of conduct that govern its approach to the five key areas of its corporate responsibility strategy (Table 3). Each policy has been updated based on the findings of the child rights assessments. New policies being developed, such as the company-wide Privacy Policy and Responsible Marketing Policy, also include a child rights perspective.

Two policies deal directly with child rights: the Child Labour and Young Workers Policy and the Child Online Protection Policy and Guidelines.

Table 3. Group policies and codes of conduct relating to children's rights

Policy	Children's rights issues
Millicom Code of Conduct	States the company's high-level public commitment to the Universal Declaration of Human Rights, UN Guidelines for Business and Human Rights, and Children's Rights and Business Principles
Millicom Supplier Code of Conduct	Specifies minimum age requirements, family policy requirements for suppliers
Millicom Privacy Policy (in progress)	Specifies special requirements for under-age customers
Millicom Responsible Marketing Policy (in progress)	Specifies requirements for portrayal of children in marketing materials, easy to understand terms and conditions, and exposure of children to marketing messages
Child Labour and Young Workers' Policy	Sets the age limit for hiring employees, as well as the age limit for specific groups of contract workers; contains guidance for verifying age and remediation
Child Online Protection Policy and Guidelines	States the commitment to child protection online and gives specific guidance for technical and other teams

Framework for assessing children's rights

Following the assessment in the DRC, Millicom collaborated with UNICEF to develop a self-assessment tool that would focus on the children's rights issues directly relevant to its business operations. The aims were to enable Millicom operations in different countries to analyse to what extent policies and management systems are applied or followed, and to identify the risks in each market.

Children's Rights Assessment Tool for mobile network operators

The tool for assessing the impacts of mobile network operators on children's rights developed by Millicom and UNICEF features six primary self-assessment areas for specific functional areas within a company: corporate social responsibility; human resources; product, sales and marketing; procurement; network operations; and security. The tool can be used at the corporate level or at the market level, and can be complemented with the following:

- 1. Review of legal and regulatory landscape:** Review of legislation in place to govern human rights/ children's rights in the country, and the capacity of local government to enforce relevant laws.
- 2. Research on allegations and risk drivers concerning children's rights in the operating environment:** Recent media reports covering the company or its industry peers; cases and allegations of negative impacts on children involving the company or any industry peers; the key children's rights issues in the country; and the drivers of risks to children's rights in the country, such as a significant young population, restricted access to the Internet, child poverty and cultural considerations.
- 3. Engagement with key external stakeholders:** Understanding how external stakeholders perceive the company's responsibility towards children and the actions they expect the company to take with respect to its impacts on children's rights. Many mobile network operators produce, market and sell their products and services across multiple locations. Therefore, it is important to engage with regional and in-country stakeholders representing high-value and high-risk areas, and the diversity of the company's operations. Discussions can look at the company's impacts on children's rights in general, or in specific areas.

The assessment process at Millicom

In 2015, Millicom deployed the assessment tool in Rwanda and Tanzania, and in 2016 in Bolivia, Colombia and El Salvador. There are now plans to assess operations in Costa Rica, which focus on cable and fixed-line services. Assessing operations in Costa Rica will allow Millicom to dive deeper into the specific risks to children's rights associated with these services, which are increasingly important in its Latin American markets.

The global corporate responsibility team led four of the assessments, interviewing country teams, local senior management and other key colleagues. One country led its own assessment.

Teams and individuals interviewed first received an introduction covering children's rights in general, Millicom's programme on children's rights and the drivers of risks to children's rights. The introductions were illustrated with findings and examples from assessments already completed relating to each department's potential impacts and potential risks. The illustrations were important in engaging different functions as some initially had difficulty understanding the potential links between their activities and the rights of children.

Interviews with senior management teams identified the approaches, policies and guidelines related to children's rights, dedicating up to two hours to each of the six business areas (Table 4). In-depth discussions with the leaders of operational teams then determined the controls that were in place and how existing guidelines were applied. Interviewees were able to ask questions about policies and procedures, how departments are to ensure controls are in place and implemented in practice, and how departments can assess their effectiveness.

Table 4. Interviewees in six business areas

Business area	Interviewees at country level
Corporate social responsibility and compliance	Two departments: <ul style="list-style-type: none"> • Corporate responsibility: corporate responsibility manager and team • Compliance and business ethics manager
Human resources	<ul style="list-style-type: none"> • Vice-president or head of human resources • Human resources controller • Compensation and benefits manager
Products, sales and marketing	Two departments: <ul style="list-style-type: none"> • Commercial department: leading product development or offerings – head of department • Sales and marketing: vice-president marketing, sales force manager
Procurement	<ul style="list-style-type: none"> • Vice-president or head of procurement • Contract manager or roll-out manager
Network operations	<ul style="list-style-type: none"> • Chief technology officer or head of operations • Network deployment manager • Operations and maintenance manager • Head of legal or corporate lawyer
Security and emergencies	<ul style="list-style-type: none"> • Head of corporate security • Health, safety and security manager • Chair of crisis committee, if in place

Engaging external stakeholders and reviewing regulatory issues

Millicom complements the assessments by consulting widely with external stakeholders: global organizations that work on child protection such as Interpol, Internet Watch Foundation, INHOPE Foundation, International Center for Missing and Exploited Children (ICMEC) and Child Helplines International; industry through the GSM Association (GSMA), in particular the GSMA Mobile Alliance Against Child Sexual Abuse; local government and law enforcement agencies; and children's rights organizations.

In two markets, Colombia and Tanzania, Millicom consulted in-country UNICEF offices. These discussions helped to understand local priorities; identify key developments, risks and opportunities; determine the regulatory context; and investigate opportunities to collaborate. Millicom also plans to consult UNICEF when finalizing action plans.

In addition to directly engaging with external stakeholders on risks to children's rights, Millicom undertakes ongoing risk assessments using Maplecroft-Verisk risk indices and monitors regulatory and legal developments in its markets. These assessments and monitoring allow Millicom to map a variety of risks in its markets, from child labour to political and regulatory risks.

In 2012, Millicom carried out an in-depth risk assessment of labour standards in each market. Laws and regulations most relevant to children's rights concern child protection online, such as criminalization of cyberbullying or possession and distribution of child sexual abuse content. Paraguay, for example, has proposed regulations mandating parental control and filters on public WiFi services. Child protection often features among broader considerations – sometimes described as drivers – in legislative proposals on data retention, cybercrime or law enforcement.

Setting priorities from assessment results

Millicom's global corporate responsibility team needed to be able to compare the results of the assessments in each market and to ensure that the actions to be taken as a result were appropriate but tailored to the local context of each operation. To do this, the Millicom global corporate responsibility team developed a template that covered each topic area to help local teams identify the next steps for mitigating risks and identifying best practices that could be applied across the Group.

The template rates each proposed action to help define priorities and to enable benchmarking with other markets. Each action is rated according to the following criteria:

- Quick win – an action that could be implemented quickly with minimal resources
- Good practice – a 'showcase' example that demonstrates best practice, and which other operations could replicate
- Standard practice – a standard good practice that is consistently applied across the Group
- High risk – urgent action required because of material risk or stakeholder visibility and exposure
- Medium-term to long-term opportunity to improve – an opportunity to use Millicom's global guidelines for improving practices in line with the company's children's rights and online protection priorities and business strategy
- Low priority – not immediate priority or less relevant to the operating entity at this time.
- Long-term opportunity – a need to be addressed at Group level by establishing global guidelines and objectives

The global corporate responsibility team reviews the priorities that local assessment teams have identified and compares the results across markets. Each country team and the global corporate responsibility team then work together to finalize the action plans, ensuring that they reflect the operational context, and regulatory and stakeholder issues. The global corporate responsibility team also reviews the assessments to determine Group-wide priorities.



Findings and action plans

Following each assessment, each country developed an action plan, which was validated locally and at Group level, and in some cases was shared in consultations with external stakeholders.

The in-country assessments have pointed to gaps and opportunities to address children's rights. Some of these relate to improvements needed in the implementation of current policies at the local level. In addition, a number of issues have surfaced in the five markets that have affected the prioritization of Millicom's child rights programme at the Group level.

Findings of local assessments

Generally, most findings at the country level revealed the need to work more in depth in the implementation of different policies, or the need to clarify policy implementation steps with specific teams. These findings are grouped in Table 5, which highlights issues that surfaced in at least one of the local assessments, and have brought more substantial operational-level understanding to the Group-level priorities already identified.

Table 5. Examples of opportunities found in assessments for Millicom to further improve its child rights programmes. Findings are from country-level assessments.

Assessment area	Topic	Finding
Corporate responsibility and compliance	Grievance mechanisms	Consider dedicated grievance mechanism for children (incorporated in whistleblowing); opportunity to establish partnerships with helplines
	Communication	The company's commitments to children's rights could be clearer on subsidiaries' websites in local languages
Sales and marketing	Responsible marketing	Formalize policies on advertising to children or when children are featured in advertising, as some advertising, such as for Tigo Music services, is clearly attractive to children
	Age verification	Work with third-party app providers to strengthen age-verification methods
	Content classification	Formalize process for classifying content that is not suitable for children (with the exception of pay TV third-party content, such as Netflix, where this is already integrated)
	TV programming	Define 'watershed' hours for programmes unsuitable for children where local legislation does not exist
Human resources	Minimum age of employment and preventing child labour	Further improve robustness of implementation of Group's minimum age policy and age checks of outsourced workers is lacking
	Support to pregnant women	Design company-wide procedure to assess the risks to pregnant employees and make changes to their roles; provide training and support to managers in assessing these risks and changing employees' workloads or reassigning them
	Apprenticeships	Identify specific departments and roles best suited for apprenticeships and create specific programmes with universities
Security and emergency services	Grievance mechanisms	For security and business continuity reasons, most Millicom facilities are not branded; those wishing to lodge a complaint about security services and incidents affecting or involving a child may not know who to contact
Supply chain	Training suppliers	Identify categories of suppliers facing higher than usual risks relating to children's rights, and incorporate training on children's rights into their training
Electronic waste	Vetting e-waste suppliers	Align to Group level e-waste programme and carry out assessment and due diligence of suppliers prior to any e-waste sales to them

Outcomes of assessment findings: Action plans

The assessments overall demonstrated a broadly similar pattern of risk, but each country has demonstrated different strengths and weaknesses. Similarly, each assessment brought new issues to the fore since the first assessment implemented in the DRC. These differences underscore the value of undertaking assessments in each country in order to prioritize issues to address and develop appropriate action plans – and to continue to be able to identify and address new issues as the business and operating environments evolve.

The findings of the assessments have encouraged Millicom to take new approaches to a range of issues across the company. At the Group level, priorities address the risks and opportunities identified in several country assessments:

- Preventing child labour and managing young workers
- Protecting children online
- Dealing with electronic waste
- Developing family-friendly policies and supporting working mothers
- Tying social investment to children's rights goals

Preventing child labour and managing young workers

The assessment in the DRC found inconsistencies between Millicom's global guidelines on hiring employees, which give 18 years of age as the minimum, and national policies. In practice, the DRC operation followed Millicom global guidelines, although national policies in force followed local laws and guidance from the International Labour Organization. Following up on this finding, Millicom has set out to align Group and local policies in contexts such as the DRC, as the Group guidelines are appropriate. A lower minimum age would further complicate the already complex challenge of receiving appropriate proof-of-age documentation, when enforcing the policy already required significant company resources.

The Child Labour and Young Workers Policy subsequently developed by Millicom, therefore, sets the minimum age of direct hires at 18 years (with the exception of trainees). The policy identifies tasks where the age limit also applies to outsourced workers:

- Freelance workers (individual sales agents), paid on commission, which may encourage working long hours
- Drivers (to transport maintenance and sales staff), as they may work long hours, and for safety reasons; in many Millicom markets, the legal driving age is 16
- Building and technical maintenance staff, who engage in hazardous and physically demanding labour

While Millicom recognized the importance of providing young people with jobs, it also acknowledged that the company needed to control risks associated with child labour in often very difficult control environments. This meant issuing very clear guidance to local entities that leaves little room for interpretation.

Protecting children in the digital world

The most significant initiative on children's rights resulting from the assessments concerns protecting children online. In all of Millicom's Latin American markets, programmes are now in place to raise awareness among parents on issues that their children may face online and to equip them to accompany their children in the online world. Millicom also runs training programmes for children. By the end of 2016, over 122,000 children had taken part in a training session, and programmes had reached nearly 15,000 teachers and 13,000 parents. Pamphlets providing parents with information on child online safety, developed jointly with UNICEF, are available to Millicom customers in three markets in Latin America; an online portal was launched in 2017.

Millicom is rolling out training on child online protection (COP) to employee volunteers in three countries in Latin America to provide a sustainable foundation for COP programmes in schools. A COP module will be introduced for all employees, together with a module tailored to customer-facing staff.

Millicom also engages proactively on emerging children's rights issues in the digital world. In partnership with UNICEF, Millicom has convened multi-stakeholder workshops in eight markets. The workshops have brought together government, law makers, law enforcement, children's rights organizations and industry to set up national committees, identify gaps in local legislation and bring industry players together in joint efforts. In Costa Rica, for example, thanks to a workshop organized in 2015, the National Online Safety Committee was relaunched by the Vice-Ministry of Telecommunications and a private sector workgroup was established to provide an industry level view on COP.

Millicom is a member of the GSMA Mobile Alliance Against Child Sexual Abuse Content and voluntarily blocks access to child sexual abuse content in most of its Latin American markets. The aim is to have these measures in place across the region in 2017. Millicom is a member of United Nations Global Compact on the global level. In addition, several subsidiaries are members of local networks, reporting Communication on Progress on the local level, including relating to child labour risk.

The local assessments have raised awareness of specific impacts on children's rights of digital products and their sales and marketing, as might be expected because sales and marketing are largely locally driven. While Millicom and all mobile operators are bound by consumer protection regulations that do not allow customers under the age of 18, many under-18s have a mobile phone or access to fixed-line services registered under their parents or guardians. Assessments found that although on paper Millicom subsidiaries do not have customers under the age of 18, there are very few internal policies or formal procedures relating to the minimum age of customers. The exception is Millicom's pay TV policy, which requires additional proof of identity and age to activate services providing adult content. As a result of these findings, Millicom is working on a global responsible marketing policy in 2017.

Dealing with electronic waste

Modernization of Millicom's network infrastructure means that significant amounts of electronic waste will be generated, for example from antennas and radios. The responsible electronic waste programme ensures that waste is collected from the field and taken to central warehouses, separated from scrap metal, and sold only to vetted and certified companies. In ensuring that electronic waste is sold only to certified and specifically vetted buyers, Millicom seeks to mitigate the risk of children dismantling electronics, and being exploited or exposed to dangerous substances. By the end of 2016, eight Millicom markets had implemented the electronic waste programme, and road maps were ready for the remaining operations.

Developing family-friendly policies and supporting working mothers

The assessments, along with consultations involving female staff, pointed to gaps in policies on maternity leave and the lack of support for employees returning from leave. As a result, policies in all corporate locations have introduced extended maternity leave and the same is under review for the operating markets. To support mothers returning to work, by the end of 2016, Millicom had introduced breastfeeding facilities at several of its local headquarters in Latin America. These facilities make it possible for mothers to express and store breast milk in a safe, hygienic environment while at work. In Bolivia, Millicom also offers childcare services in the workplace; 190 female employees and 80 male employees use one of the eight nurseries across the country.

Tying social investment to children's rights

In addition to programmes for protecting children online and engaging with communities and customers, Millicom has taken up recommendations from the assessments to direct social investment to areas that support the rights of children: education, digital and financial inclusion (with specific programmes for women and children), and supporting local entrepreneurs focusing on children.

Education initiatives address poverty and child labour, and range from providing desks, blackboards, libraries and school supplies to promoting digital inclusion, in particular in higher education and of girls. Financial inclusion programmes help women to access mobile money services, which has a positive effect on families and the wider community.

Millicom's lessons learned

Initially triggered by management concerns about child labour, the progression for assessing child rights management within Millicom has led to a paradigm shift in perceptions of children's rights across the company. Millicom has significantly broadened its understanding of the potential of business to have both a positive and a negative impact on child rights. The experience and the leadership Millicom has gained has also garnered understanding of how managing corporate responsibility risks can at the same time bring wider value to the company and the communities in which it operates.

Assessments help build capacity

The assessments have started to improve understanding of how Millicom's business model may affect children's rights – among board members, executives, managers, staff and shareholders. During the first assessments, it became clear that many employees did not see how children's rights related to their work. Providing an initial introduction to children's rights in the telecommunications industry and practical examples of how each department could have an impact on children's rights was important in the assessments, making interviewees more comfortable in exploring risks and opportunities.

By raising awareness of children's rights, the assessments have enabled Millicom to improve practices at the local level. The response from country teams was unequivocally positive and supportive; the issues raised brought new perspectives – and even meaning – to the tasks of company employees. The assessments are building knowledge and skills on children's rights in both the global and the local corporate responsibility teams.

Recognizing the human rights of children can lead to recognition of wider human rights

The assessments of the impacts of the telecommunication sector on children's rights have allowed Millicom to start conversations on human rights in contexts where they otherwise might not have happened. Millicom has been able to share its in-depth understanding of children's rights in the telecommunications sector with the organizations it engages with on privacy and freedom of expression.

Both bottom-up and top-down inputs are valuable

Carrying out assessments at both the global level, based on a general children's rights framework, and locally – with the tailored self-assessment tool – has allowed Millicom to drill down to detailed, operational issues that affect children's rights.

At the local level, assessments have provided important insights into gaps or misunderstandings in implementing

Group policies on children's rights. Local assessments have helped Millicom to ensure that future policies take account of context-specific realities and practices. For example, input from local teams has helped to develop the Millicom Child Online Protection Policy. At the Group level, the insights on challenges to local subsidiaries in implementing Group policies have enabled Millicom to address local issues directly, but also to rethink how policies are applied locally.

Lack of local regulations means subsidiaries must voluntarily self-regulate

The lack of local regulations on recognizing children's rights continues to be a challenge in many Millicom markets. Local regulations may not support good practices for recognizing children's rights, meaning that telecommunications companies do not have a level playing field regarding meeting requirements – recognizing children's rights is essentially voluntary. This demands a lot from local subsidiaries in terms of self-regulating and putting in place robust internal controls.

Assessments of impacts on children's rights can guide corporate social responsibility

Millicom's current five-year corporate responsibility strategy was heavily influenced by the findings of the child rights assessments. The results of the assessments helped to determine priorities, and are helping to develop action plans. The electronic waste programme has been accelerated, and the diversity programme has been amended to provide support for mothers returning from maternity leave.

Ongoing assessments keep knowledge up to date

Ongoing local assessments enable Millicom to keep its knowledge on children's rights up to date. Keeping current enables Millicom to swiftly respond to rapidly evolving developments in the industry, for example, by making the development of a responsible marketing policy for new digital products – including responsibilities regarding children – a key priority for 2017.

A practical guide helps local teams deliver consistent self-assessments

In using the self-assessment tool, local teams found they needed guidance on conducting the assessment, scoring and the depth to which each of the areas should be explored. To deal with this, the global corporate responsibility team developed a practical guide to the tool and Millicom policies. The guide helps to ensure consistency across the assessments and the analyses of the results.

UNICEF recommendations for the telecommunications industry

Sharing Millicom's experience in assessing how its policies and operations might affect children's rights may help other companies wishing to identify risks and opportunities to children in their operations. While business models and contexts differ, the following suggestions may be useful in enabling companies to recognize and respond to children's rights.

Evaluate and respond to rapid developments that could affect children's rights

As new risks emerge, new opportunities arise, new technologies materialize, supply chains adapt and customer bases evolve, it is important for industries to evaluate how these developments could affect children's rights and to incorporate appropriate measures into their operations. This means allowing for ongoing iterations of assessment tools as contexts change.

Go beyond child labour in supply chains

To date, industry initiatives have focused primarily on eliminating illegal child labour from supply chains. However, the impacts of companies' supply chains on children are not limited to child labour. Broader consideration of issues such as family-friendly work places, working conditions and investing in communities can significantly improve the well-being of children and their families in communities where companies operate.

Step up engagement with advocates for children's rights

Children are one of the most vulnerable population groups, meaning that companies need to pay specific attention to guaranteeing respect for their human rights. While a particular business activity might not have an impact on the rights of adults, the same activity could adversely affect the rights of children. But despite this, companies often do not adequately consider children. Moreover, children are usually not well placed to advocate for themselves and may not have a voice in their households or communities. This means that dedicated efforts must be made to reach out to children and to child rights advocates to minimize the risk of excluding children from stakeholder engagement processes. Advocates for children's rights are in close contact with children and can provide expertise on children's rights in particular contexts.

Take a balanced approach to children's rights online

Telecommunications companies should review both the risks and opportunities, and how their operations and products can have an impact on children's rights to protection, participation and inclusion. Companies must strike a careful balance between children's right to protection and rights to access to

information and freedom of expression. This means ensuring that measures to protect children online are appropriately targeted and not unduly restrictive, either for children or for other customers. A protectionist approach risks overlooking how children exercise their rights in a digital world. As measures such as blocking websites and online filtering directly affect how children use the Internet, it is important to understand and explore the full range of children's rights as active users of ICTs.

Start from within to achieve the Sustainable Development Goals

The Sustainable Development Goals offer the telecommunications industry new opportunities to support development of strong economies and societies in which business can thrive, and mitigate potential risks in business practices. Commitment to the Sustainable Development Goals demonstrates a company's values to employees, investors and consumers. In contributing to achieving the Sustainable Development Goals, businesses have a responsibility to start from within by ensuring that operations and supply chains do not have a negative impact on children and their families.

Collaborate with stakeholders

Multi-stakeholder collaboration is crucial to establishing the foundations for safe, secure and positive uses of the Internet and associated technologies. Governments, the private sector, policymakers, educators, civil society, parents and caregivers all play a vital role. Involving stakeholders is fundamental – from identifying impacts through to developing and implementing action plans.

Do not consider children as a homogenous group

Access to technology and the Internet is far from global. Even in industrialized countries, children in underprivileged communities are less likely to be online. The barriers to Internet access are increasingly barriers to education; the emerging digital divide could deepen inequalities that threaten to leave the poorest and most vulnerable children behind. Growing access does not necessarily mean equal access. Special efforts need to be made to ensure that girls, children with disabilities, children in minorities, and children in remote areas, poverty or marginalized situations have equal access to digital media.



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