



CHILD SAFEGUARDING GUIDELINE



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Corporate Responsibility Group

Contact: nachhaltigkeit@dertouristik.com or cr@dertouristik.com

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1. BACKGROUND

As one of the world's largest economic sectors and an important driver of development, tourism has social impacts. While many people benefit from the positive impacts such as job creation and economic development of destinations, there are also negative impacts that can affect the protection of human rights. This applies to both adults and children. Sexual exploitation of children is one of the worst downsides of tourism. DER Touristik Group has a long-standing commitment to preventing these crimes. However, the impact of tourism on human rights and especially on children's rights is multifaceted. Meeting the challenges requires approaches that include globally ramified value chains. Through the design of its products, the industry has direct influence on whether and how children's rights are protected, and can actively counter risks to children arising from tourism activities. DER Touristik Group continuously assesses human rights risks and opportunities within the value chain and in the destination areas. This process involves external experts, NGOs, and other stakeholders such as service providers, affected groups, and employees.

Based on the risk analysis carried out in 2018, the topic of child safeguarding as well as Thailand as a travel destination were identified as focal points. As a result, a Human Rights Impact Assessment was conducted in Thailand in 2019 to gain a more comprehensive understanding and derive participatory and effective actions. The need to a broader child safeguarding approach arose primarily from points of contact between children and tourism value creation and the resulting risks to the protection of their rights.

Following a literature review on activities linked to child right risks and product types, a group-wide portfolio analysis was conducted between November 2021 and February 2022. A total of 107 data sets containing information from the product ranges of tour operators, destination management companies, and partners were analysed and risk-related activities within DER Touristik Group's value chain were identified. For example, about 8% of respondents answered that their product range include tourist visits to orphanages while 23% of respondents stated that they offer school visits in the destination areas. Both of these activities have a negative impact on the protection of children's rights. Volunteering offers are also considered controversial. If children participate in tourist activities such as dances, shows, performances or similar, there is a risk of crossing the line to child labour. The fundamentally desirable integration of local communities in tourism value creation via host families or project visits also entails risks that can be countered by requirements and processes. Details on activities and product requirements can be found in chapter 4.

RESULTS PORTFOLIO ANALYSIS

Homestays	School visits	Projects	Performances	Orphanages	Volunteering
34 %	23 %	20 %	14 %	8 %	4 %

Proportion of respondents who stated having relevant activities on offer.

For this reason, DER Touristik Group has developed its Policy Statement on Child Safeguarding and this Guideline. These documents demonstrate the commitment to safeguarding children's rights and protecting children and define corresponding responsibilities within the group. The Guideline sets out child safeguarding requirements for tourism products and identifies impermissible products and activities that will henceforth be delisted. It also examines the informal sector and provides basic information on the issue of children in tourism for travellers. Furthermore, it describes the measures and objectives for implementing the principles and requirements of the Guideline and contains a guide for communication on the subject of children's rights and child safeguarding.

2. COMMITMENT

The group-wide policy on child safeguarding is based on DER Touristik Group's commitment to protecting human rights. The public version of DER Touristik Group's Policy Statement on Child Safeguarding is addressed to administrative units, tour operators, destination management companies (DMCs), the Hotel Division and all other units of DER Touristik Group:

As an international travel group and tourism division of REWE Group, DER Touristik Group is aware of its social responsibility. Entrepreneurial success is only possible in the long term if the impact of our business activities is in line with people and the environment. DER Touristik Group is therefore committed to strengthening human rights and preventing human rights violations. This commitment applies both to our own business activities and to our global business partners. It explicitly includes the rights of children and young people and their protection from all forms of exploitation and violence. To this end, DER Touristik Group, with the involvement of partners and stakeholders, implements an internal Child Safeguarding Guideline and related tools in the form of guidelines, reporting mechanisms and training, based on the following principles:

Laws, Norms, and Standards

DER Touristik Group commits itself and its partners, suppliers, and service providers to protecting the rights of children and young people. The Universal Declaration of Human Rights,

the UN Convention on the Rights of the Child, internationally and nationally applicable laws, the core labour standards, and the Minimum Age Convention of the International Labour Organization (ILO) represent non-negotiable standards in this respect, which are supplemented by the UN Guiding Principles on Business and Human Rights. The aim is to give children and young people the best possible opportunities for a self-determined life and to prevent any form of child labour.

Children are involved in tourist activities in numerous contexts, therefore the boundaries between mere participation in activities and commercial exploitation of children can become blurred. Especially in upstream economic sectors of tourism value creation, such as souvenir production, agriculture, vehicle maintenance or other services, there is a risk of child labour. This is unacceptable in any form. For this reason, DER Touristik Group continuously analyses where potential risks for violations of human rights and children's rights exist within the scope of its business activities and value creation. Employees and partners are trained to identify, successively reduce, and eliminate such risks, and a reporting process enables a response to violations. The measures to implement the Child Safeguarding Guideline are designed to ensure that age-appropriate employment of young people along the value chain complies with legal requirements and the highest international standards.

Requirements for Tourism Products

DER Touristik Group defines strict requirements for tourism products and obligates its partners to implement them, thus ensuring that risks to children associated with the activities are minimised and eliminated. Tourist activities must never lead to negative effects on children and young people. They must not lead to disadvantages for their physical and mental development that adversely affect their future opportunities.

Experts agree that some tourist activities hamper efforts to protect children's rights and have a negative impact on their development. These include tourist visits to schools and orphanages, which often place commercial considerations above the well-being of children. School visits are a disruption of places of learning. A large proportion of children in orphanages have at least one living parent. Placement in such institutions is also a consequence of tourism demand. DER Touristik Group undertakes not to organise tourist visits to orphanages or schools as part of its programmes or those of its partners. Corresponding programme items are replaced by activities in which children's rights are protected. For offers such as overnight stays in host families (homestays) or project visits, strict requirements apply which are implemented with the involvement of the hosts and project partners to ensure the protection of the children and young people. DER Touristik Group will no longer offer any volunteering since it cannot be guaranteed that no children will be involved in these offers.

Training and Awareness-Raising

DER Touristik Group trains the employees of its tour operators, hotels, and destination management companies, as well as tour guides and business partners, on the subject of children's rights and child safeguarding.

Employees in the tourism departments of DER Touristik Group tour operators have a direct influence on the design of tourism products and activities. They implement the principles of child safeguarding on the basis of the processes, requirements and measures defined in the Child Safeguarding Guideline jointly and with the involvement of partners. This includes training and awareness-raising measures on children's rights and child safeguarding, involving not only employees but also partners such as projects in the destination areas or host families (homestays). In addition to the requirements for protecting children's rights in the design of tourism products, they are also sensitised to the problem of sexual exploitation of children in tourism and trained to deal with suspected cases.

Prevention of Sexual Exploitation of Children

One focus of DER Touristik Group's child safeguarding programme is the prevention of sexual exploitation of children in tourism. Travellers and partners are sensitised and made aware of options for action, such as reporting suspected cases. A contractual zero-tolerance clause regarding the sexual exploitation of children applies to all partners, suppliers, and service providers.

Child sex offenders use the tourism infrastructure, which includes hotels and means of transport as well as places such as restaurants, bars, or beaches to sexually exploit children. For this reason, employees of the destination management companies, tour management and the accommodation of DER Touristik Hotels & Resorts as well as partner hotels bear a high level of responsibility for the protection of children from sexual exploitation. DER Touristik Group raises awareness of the problem among employees, customers and partners and communicates low-threshold options for reporting suspected cases. Guests can also confidentially contact tour management or hotel employees and make a valuable contribution to child safeguarding by reporting suspicious situations via the reporting platform <https://dontlookaway.report/>. Observations are then passed on to the child protection organisation ECPAT or forwarded to the appropriate law enforcement agencies. Together, we can break the culture of looking the other way and strengthen the rights of children around the world.

Implementation of the Six Criteria of The Code

DER Touristik Group is a signatory to "The Code", the code of conduct for the protection of children from sexual exploitation in tourism, and consistently implements its six criteria.

With its six criteria, the international organisation "The Code" provides a framework which numerous tourism companies worldwide pursue and against which they measure their results. These include guidelines and processes, employee training, the involvement of partners, for example through contractual agreements, awareness-raising among travellers, the involvement of a broad spectrum of stakeholders, and annual reporting on the measures implemented.

Recommendations for Travellers

DER Touristik Group provides information and recommendations for action against any forms of child exploitation outside the tourism value chain in the environment of tourism infrastructure and in the informal sector.

In many travel destinations, guests are confronted with situations that they do not know in this form from their home countries. Examples include begging children or children offering goods and services or performances on the street or in the vicinity of attractions. Organised groups often force these children to earn money, keeping them away from education and thus from opportunities for a self-determined life through employment in the informal sector. The children end up being trapped in the vicious circle of poverty, and it is not uncommon for dependencies to develop that can easily lead to the sexual exploitation of children. Donations of any kind to children should therefore be discouraged. Instead, children and young people in need of help can be supported by recognised organisations and travel companies that have a proven social commitment in the destination areas.

Social Commitment

DER Touristik Foundation promotes the social and economic living conditions of people and is committed to protecting ecological habitats in less developed tourist regions worldwide.

Established in 2014, the non-profit organisation DER Touristik Foundation, pools the DER Touristik Group's social commitment beyond the scope of its business activities and ensures that sponsorship projects are supported effectively and sustainably. Their aim is to harness the power of tourism to protect the diversity of our planet and sustainably improve economic development and living conditions, particularly in less developed tourist regions. In addition to preserving ecological habitats and biodiversity, the DER Touristik Foundation is committed to providing opportunities for children's education and promoting training for young people, thus contributing to sustainable development. Donations from partners and guests flow in full into the sponsorship projects.

Dialogue with Stakeholders

DER Touristik Group is in continuous dialogue with stakeholders such as child safeguarding experts and other relevant groups involved in child safeguarding.

DER Touristik Group is a member of the "Roundtable Human Rights in Tourism", the Child Safeguarding Working Group of the German Travel Association (DRV), the Sustainable Tourism Working Group of the British travel association ABTA and other bodies and industry associations. It is in constant exchange on current developments with child protection organisations such as ECPAT and their worldwide partner organisations as well as authorities. Their joint commitment is to work together on awareness-raising campaigns and to implement cross-industry initiatives to uphold children's rights and prevent the exploitation of children in tourism.

The document is available in English and German. It can be translated into other languages as required. The translation is to be coordinated with the Corporate Responsibility Group department. The terminological requirements from the so-called Luxembourg Guidelines (see chapter 6.1. 'Terminology' and 7.3. 'Resources') must be observed.

3. RESPONSIBILITIES

Overall responsibility for child safeguarding within DER Touristik Group lies with the Executive Board and the Extended Executive Board. The Corporate Responsibility Group department is considered the central control unit coordinating all measures. Within the department, overall responsibility lies with the department management. Operationally, the topic is assigned to the Human Rights and Child Safeguarding Officer. He advises and coordinates various business units with the involvement of external child safeguarding experts.

Within the individual international units, responsibility lies with the management of the respective country. In the divisions (Central Europe, Northern Europe, Eastern Europe) or corporate units (DER Touristik UK, DER Touristik Suisse, etc.) with Corporate Responsibility departments or officers, the tasks are coordinated accordingly by these or the person designated for this purpose. In the destination management companies, the Sustainability Officers and in the company's own hotels, the Sustainability Officers (at DER Touristik Resorts & Hotels, the so-called SEHA Agents) are entrusted with child safeguarding. The respective product managers of the tour operator concerned, the Destination Management Company or the hotel are involved. Other departments are involved through training measures and internal reporting processes and are in contact with the Corporate Responsibility Coordinators at country or Group level, in particular to check compliance with requirements.

The Take Action Tool provides an overview of the most important fields of action for travellers, all departments and units resulting from the requirements of the Child Safeguarding Guideline (see Chapter 4. 'Requirements').

TAKE-ACTION-TOOL

TRAVELLERS

Protecting child rights

- Get informed on child rights and child safeguarding through information provided by DER Touristik Group and other sources
- Interact with children appropriately to their age, respect their privacy
- Do not give presents or donations to children directly. Do not buy from children
- Donate to reputable organisations supporting children and families
- Ask for permission taking photographs
- Seek aid in case children are at danger
- Report child rights violations to the Human Rights & Child Safeguarding Officer at DER Touristik Group
- Report suspected cases of sexual exploitation to child protection organisations, the police or the International Reporting Platform

School & orphanage visits

- Do not visit school and orphanages
- Donate to reputable organisations promoting the education of children and the empowerment of women and families

Volunteering

- Volunteer only with organisations implementing the Volunteering Policy of The Code

Homestay & project visits

- Visit homestays and projects only with providers with Child Safeguarding Policy
- Get informed about the cultural standards
- Interact with children appropriately to their age and while parents are present
- Do not give gifts or donations to children directly
- Respect the privacy of children. Ask for permission when taking photographs

Hotels- & accomodation

- Report suspected cases of sexual exploitation to hotel staff, tour guides, the Human Rights & Child Safeguarding Officer at DER Touristik or the International Reporting Platform
- Do not invite unrelated children to the hotel or the room, whatever the intention is

PRODUCT, PROCUREMENT, CONTRACTING, DMC & TOUR GUIDES

Protecting child rights

- Attend the detailed child safeguarding training module
- Identify relevant products in the annual portfolio analysis
- Involve partners in stakeholder dialogue and offer voluntary training
- Ensure that the ILO Minimum Age Convention 138 is met when children are involved in activities
- Implement the Supplier Code of Conduct with zero tolerance policy
- Provide information to travellers, communicate the hintbox and the International Reporting Platform for cases of sexual exploitation

School & orphanage visits

- Do not sell and replace school and orphanage visits by activities meeting the requirements of the Child Safeguarding Policy
- Inform inquiring schools and orphanages about the DER Touristik Group Child Safeguarding Policy

Volunteering

- Do not sell and replace volunteering activities by activities meeting the requirements of the Child Safeguarding Policy

Homemestay & project visits

- Involve partners in stakeholder dialogue and offer voluntary training
- Ensure Supplier Code of Conduct and contractual Zero Tolerance Clause are signed by partners
- Ensure that the ILO Minimum Age Convention 138 is met when children are involved in activities
- Implement and monitor child safeguarding requirements of partners along with contracting process
- Enforce attendance of partners in mandatory child safeguarding training
- Sensitise clients for cultural standards within the destination

Hotels- & accomodation

- Involve partners in stakeholder dialogue and offer voluntary training
- Ensure Supplier Code of Conduct and contractual Zero Tolerance Clause are signed by partners
- Ensure that the ILO Minimum Age Convention 138 is met when children are involved in activities

LEGEND

- Requirements
- Impermissible activities
- Conditions for permissible activities

PARTNERS

Protecting child rights

- Sign Supplier Code of Conduct and contractual Zero Tolerance Clause
- Involve stakeholders e.g. local child rights/ protection organisations in dialogue
- Ensure that the ILO Minimum Age Convention 138 is met when children are involved in activities

Homestay & project visits

- Sign Supplier Code of Conduct and contractual Zero Tolerance Clause
- Involve stakeholders e.g. local child rights/ protection organisations in dialogue
- Ensure that the ILO Minimum Age Convention 138 is met when children are involved in activities
- Attend child safeguarding training with focus on requirements (incl. a quiz)
- Provision of own sleeping quarters for guests
- Apply the two-adult principle
- Provide knowledge on cultural standards to guests
- Vocational training facilities are only visited if visits take place outside of the regular training and/or if guest interaction is part of the training approach

Hotels- & accomodation

- Sign Supplier Code of Conduct and contractual Zero Tolerance Clause
- Involve stakeholders e.g. local child rights/ protection organisations in dialogue
- Ensure that the ILO Minimum Age Convention 138 is met when children are involved in activities
- Own Hotels: Attend mandatory child safeguarding training with focus on the prevention of sexual exploitation of children
- Partner Hotels: Voluntarily attend child safeguarding training with focus on the prevention of sexual exploitation of children

MARKETING, COMMUNICATION, RETAIL & SALES

Protecting child rights

- Promote the Child Safeguarding Policy of DER Touristik Group
- Implement the guidelines on terminology and visual language when communicating about children
- Provide information to travellers on how to interact with children during travels
- Sensitise for sexual exploitation of children in tourism and communicate the International Reporting Platform
- Ensure that the ILO Minimum Age Convention 138 is met when depicting children (e.g. do not show children working)

School & orphanage visits

- Children in schools and orphanages are not promoted or depicted in advertising of tourism products

Volunteering

- Volunteering activities are not promoted or depicted in advertising of tourism products

Homestay & project visits

- When promoting homestays and project visits, interpret and explain cultural standards and relevant child safeguarding requirements

Hotels- & accomodation

- The implementation of the 6 criteria of The Code for DTHR, Supplier Code of Conduct, Zero Tolerance Policy and International Reporting Platform can be communicated around hotel stays

MANAGEMENT & CR TEAMS

Protecting child rights

- Adopt the policy statement on Child Safeguarding (incl. its principles, processes and requirements)
- Implement the Child Safeguarding Guideline (incl. its processes, requirements and initiatives)
- Lead the annual portfolio analysis
- Implement the 6 criteria of The Code and report annually on the implementation
- Create training materials and sensitise for the focus topic of prevention of sexual exploitation as part of general trainings
- Carry out stakeholder dialogue at the respective level of the units

School & orphanage visits

- Provide information on school and orphanage visits in training materials

Volunteering

- Provide information on the Volunteering Policy of The Code in trainings

Homestay & project visits

- Provide information on permitted activities in trainings. Provide particular requirements for homestays and project visits to partners and for relevant employees

Hotels- & accomodation

- Complement existing training with focus on the prevention of sexual exploitation by missing components such as child rights in the supply chain, local stakeholder dialogue and internal reporting mechanisms

LEGEND

- Requirements
- Impermissible activities
- Conditions for permissible activities

4. REQUIREMENTS

This chapter contains mandatory requirements to be met for a wide variety of contexts and products associated with risks to the protection of children's rights. They include legal and institutional requirements, but go beyond these by including details on the design of products and involvement of partners, thus specifically addressing risks within the tourism value chain. The requirements are mandatory and must be implemented as part of the initiatives and objectives (chapter 5).

4.1. Legal and Institutional Requirements

DER Touristik Group aligns its business operations regarding the protection of children's rights with the following internationally applicable standards and guidelines:

- Universal Declaration of Human Rights of the United Nations (UN)
- Conventions and recommendations of the International Labour Organization (ILO) on labour and social standards (incl. the Minimum Age Conventions 138 and 182)
- Principles of the United Nations Global Compact (UNGC)
- UN Guiding Principles on Business and Human Rights (UNGPR)
- UN Convention on the Rights of the Child
- UN Convention on the Elimination of All Forms of Discrimination against Women
- Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises

In addition, all national standards and laws apply, such as the German Supply Chain Due Diligence Act, which came into force on January 1, 2023.

Guiding principles and guidelines have been derived for DER Touristik Group from the findings and international standards mentioned. They form the binding framework for action for all employees and business partners and, together with DER Touristik Group's Policy Statement on Human Rights, are to be acknowledged and complied with:

- DER Touristik Group Mission Statement
- DER Touristik Group Supplier Code of Conduct including the clauses on human rights and social standards and the zero tolerance clause on the sexual exploitation of children
- REWE Group Declaration of Principles Human Rights
- REWE Group Code of Conduct
- REWE Group Guideline on Sustainable Business Practices
- REWE Group Guideline on Fairness
- REWE Group Code of Conduct for Suppliers

4.2. Compliance With the 6 Criteria of The Code

As a member of The Code, DER Touristik Group has committed itself to implementing the 6 criteria of The Code. The Code of Conduct for the Protection of Children from Sexual Exploitation in Travel and Tourism (in short: The Code) is a multi-stakeholder initiative aimed at combating the sexual exploitation of children in tourism. The Code provides tools and support to raise awareness of this issue, defines roles and responsibilities within the industry.

The 6 criteria of The Code

- Establish a policy and procedures against sexual exploitation of children
- Train employees in children's rights, the prevention of sexual exploitation and how to report suspected cases
- Include a clause in contracts throughout the value chain stating a common repudiation and zero tolerance policy of sexual exploitation of children
- Provide information to travellers on children's rights, the prevention of sexual exploitation of children and how to report suspected cases
- Support, collaborate and engage stakeholders in the prevention of sexual exploitation of children
- Report annually on the implementation of the 6 criteria of The Code

4.3. Product Requirements

In addition to legal and institutional requirements that address all activities, specific product requirements are defined for hotels as well as for host families and project visits and impermissible activities, such as visits to schools and orphanages, are described.

4.3.1. Requirements for Hotels

All hotels from the portfolio of DER Touristik Group's tour operators must sign and comply with the group-wide Code of Conduct for Suppliers. In doing so, they commit to complying with the law, prohibiting corruption and bribery and observing human rights and social standards. This includes the prohibition of forced labour, slavery, practices similar to slavery or involuntary prison labour. The Code of Conduct includes measures against discrimination and for fair treatment as well as binding standards on remuneration and working hours. The service provider complies with the basic employee rights of the applicable national legislation and recognises the core labour standards of the International Labour Organization (ILO) as well as the Convention Concerning Minimum Age for Admission to Employment. **Service providers shall not deploy illegal child labour.**

Service providers commit themselves in particular to the **protection of children from sexual exploitation**. They confirm that they will take appropriate measures to ensure that business operations or premises are not used for the purpose of sexually exploiting or procuring children for sexual purposes or for the production, distribution or storage of pornographic material involving minors. They also confirm that suspicious behaviour by guests, employees, business partners or other persons observed on the premises of the service provider or during excursions or brought to the attention of the service provider will be reported to local law enforcement authorities *Ausbeutung geschult*.

DER Touristik Group's Child Safeguarding Guideline stipulates that all partner hotels are offered training on children's rights and child safeguarding. In cases where particular risks have been identified and in hotels where incidents have been reported, training may be mandatory.

Hotels which are part of DER Touristik Group already receive mandatory and continuous training on the topic of children's rights and child safeguarding, with a focus on the prevention of sexual exploitation.

4.3.2. Requirements for Host Families and Project Visits

Homestays and project visits can be associated with risks to the protection of children's rights. The risks can be minimised by complying with several requirements. In this chapter, individual and overall product requirements are defined. In this context, awareness-raising among travellers in the form of "Do's and Don'ts" is particularly important – see chapter 5.2. 'Awareness-Raising of Stakeholders'.

Host Families / Homestays

Homestays offer travellers the opportunity to stay with local people. For guests, this adds value to their travel experience, while host communities participate in the tourism value creation. However, they often have little experience with tourism and little knowledge of potential dangers. Children are exposed to risks arising from differing cultures, traditions, and social norms, among other factors, as they are considered particularly vulnerable and in need of active safeguarding by adults. This applies both to children in the holiday countries and to children travelling with their parents.

Homestays involve the risk that children will not have sufficient privacy; a child right according to Article 16 of the UN Convention on the Rights of the Child. Therefore, it must be ensured that they have sufficient places of retreat and, in particular, spatially separated sleeping quarters. **Guests are not allowed to share a room with children under any circumstances.** Children of homestay operators often take on household tasks related to the homestay. As a result, there is a risk of a blurred line to illegal forms of child labour. Therefore, the age limits defined by the ILO for work performed by children must be observed (see chapter 4.3.3. 'Impermissible Products – Child Labour' and 7.1. 'Definitions and Abbreviations').

In order to ensure the implementation of child safeguarding requirements in practice, regular monitoring in the form of surveys and checklists are to be carried out by the contractor – usually

the Destination Management Company. In these surveys, homestay operators are to describe their experiences with guests and the extent to which children are involved in the process. In addition, it should be checked whether DER Touristik Group's requirements for child safeguarding are known and what support services are requested with regard to homestays as well as the protection of the family and children. This is regularly reviewed in the risk analyses on human rights due diligence conducted by DER Touristik Group.

In order to ensure the protection of children and the safeguarding of their rights, it is important that homestay operators, contracting parties, tour management and travellers are each informed about the contents of this Child Safeguarding Guideline in a way that is appropriate for the target group (see chapter 5.2. 'Awareness-Raising of Stakeholders'). In this way, risks can be avoided, problematic situations can be identified, and necessary measures can be taken in case of emergency.

Further requirements for homestays can be found in section 'Overall Risks and Measures'

Project Visits

One form of tourism offer is the possibility to participate in different projects, such as nature and animal conservation projects, initiatives that promote cultural heritage, educational projects, and various types of charitable or social projects. During project visits, travellers can gain insights into the respective topics and challenges and contribute to the promotion of the pursued goals by providing financial support. If this involves encounters with children, it must be ensured that their rights are protected. All project partners where there are casual or planned encounters between visitors and people under the age of 18 must have a Child Safeguarding Guideline in place. Travellers are informed in advance about cultural characteristics, rules, and appropriate behaviour. During their stay, they are always accompanied by employees of the project institution. Direct, unsupervised contact between guests and children, such as playing, is prohibited in the context of project visits.

Visiting facilities for the institutional accommodation of children (e.g. orphanages) as well as kindergartens and schools in a tourist context is not permitted (see chapter 4.3.3. 'Impermissible Products'). An exception is visiting vocational training institutions for tourism to which restaurants, tourist accommodation or similar services are connected and where interaction between trainees and guests is part of the curriculum. When visiting vocational training facilities, it must be ensured that encounters take place according to defined rules so as not to disrupt training. The visits must be physically separate from other learning facilities. Visits to accommodations and other private areas are also prohibited.

Overall Risks and Measures (Homestays and Project Visits)

Risks associated with both homestays and project visits include **inappropriate, non-age-appropriate behaviour by adults towards children**, and thus the risk of physical, emotional, and sexual violence. Various measures must be taken to prevent these risks. Homestay operators, the tour manage-

ment and employees of projects which are being visited as part of tourist activities are informed about DER Touristik Group's Child Safeguarding Guideline and must agree to it. They are given access to online short training courses which they must complete (e.g., via smartphones). These include an introduction to the topic of children's rights, DER Touristik Group's position on the safeguarding of children, risks and requirements for operations, and measures that serve to protect children's rights. The addressees are encouraged to inform tourists about cultural characteristics, rules and appropriate behaviour, especially when dealing with children. In doing so, travellers are made aware of their role model function. In the context of **homestays and project visits, the two-adult principle** applies to ensure appropriate behaviour. This means that children must never be left alone with adults who are not parents or guardians.

In addition, the online short trainings address the question of what to do in the event of a suspected or actual violation of children's rights (See chapter 5.5. 'Reporting Processes'). The training sessions are documented and repeated on a regular basis. Furthermore, DER Touristik Group establishes contacts with local child protection organisations, which can also provide advice.

Informing visitors is of particular importance.

- Content specifications for training of homestay operators and project partners can be found in chapter 5.1 'Training for Employees and Partners'
- Recommendations for raising awareness of homestay guests and project visitors can be found in chapter 5.2 'Awareness-Raising of Stakeholders' as well as in chapter 6 'Communication'

4.3.3. Impermissible Products

Activities that pose a high risk to the protection of children's rights are not permitted as part of the implementation of DER Touristik Group's Child Safeguarding Guideline and will be discontinued or replaced. **In the following sections, such activities and associated risks are described in more detail. Recommendations** are given on **how travellers can contribute more effectively to communities in the destination areas instead of engaging in risk-related activities.** The aim of this chapter is not only to suggest the cancellation of the activities in question without replacement, but also, where possible, to modify the products to find suitable alternatives – for example, instead of visiting a primary school class, a cooking class with local people could be offered.

School Visits

Visiting schools as part of tourist programmes has become increasingly popular in recent years. The institutions concerned are often regularly visited by guests. Often, the visitors have good intention and contribute to the generation of donations. However, this leads to the schools and children becoming financially dependent on the tourists and income generation being prioritised over the educational mission.

School visits have a negative impact on children's school attendance and development in many ways. Schools should first and foremost be safe and secure places of learning. However, tourist

visits cause children to be distracted from the lessons. Regular contact with constantly changing strangers bears the risk of impairing children's development. The children are often forced to sing, put on shows or dance to please tourists. They may also become used to being photographed, so that their right to their own image can be at risk.

The **development and purchase of products** that include **school visits** are **no longer permitted at DER Touristik Group with immediate effect.** Existing products are to be modified with the suppliers to such an extent that school visits no longer take place and alternative programme items are found. The only exception are certain training institutions for vocational training in tourism (see chapter 4.3.2. 'Requirements for Host Families and Project Visits').

Orphanage Visits

The term of orphanage refers to the institutional placement and care of children who have lost one or both parents. Other terms are used synonymously, such as children's home, foster home and the like. The majority of tourists who visit orphanages comes with good intentions and is unaware of the prevailing deficits. Visiting orphanages has given rise to a veritable orphanage industry in various destinations, a development that has often run parallel to the development of tourism. Due to the great interest in visiting or staying in orphanages within the framework of volunteering programmes, the demand of orphanages for "orphans" is increasing. There are numerous confirmed cases of traffickers who kidnap children from poor families and then take them to orphanages to earn money with them. In many cases, they even get the consent of the parents, who are promised an education and better future opportunities for their child. UNICEF estimates that at least 2.7 million children are living in orphanages or facilities for the institutional placement of children. However, the majority of these have at least one living parent or other relatives. Many orphanages are run by private individuals, are not officially registered, and are hardly subject to inspections. The primary goal of the many illegally run orphanages is to make a profit.

Orphanages cannot always provide a good education as there is usually a lack of qualified teachers. In some cases, teaching is done by volunteers who often do not have enough teaching experience. Moreover, the children are disturbed in their learning by visitors for whom they put on shows, performances or dances to please tourists and generate donations. Many of the children who grow up in this type of orphanage and are affected by the deplorable conditions there do not manage to lead an orderly and self-determined life in adulthood.

Thus, without knowing, tourists contribute to the children growing up far away from their families in institutionalised accommodations and partly affected by violence. **Due to the uncontrollable risks and deplorable conditions, DER Touristik Group will discontinue visits to orphanages and institutional care facilities with immediate effect.** Existing products are to be adapted with the provider of excursion programmes and replaced by alternative activities.

In most cases, it is best for children to grow up with their parents or families. Therefore, supporting projects that work to empower women and promote families is a good alternative. DER Touristik Group, for example, promotes families by having this Guideline which allows homestay accom-

modations under strict conditions. These can serve as a source of income and, in turn, can help families to have the financial means to provide for their children.

Child Labour

Cultural or folkloric performances are popular elements in travel programmes. These include in particular **performances, dances, and shows**. While they can **maintain traditions and generate income, they can also create new dependencies**. An assessment of the pros and cons reveals existing grey areas. What is clear, however, is that any form of tourist performance in which children participate is associated with risks in connection with their rights. Performances often take place in the context of school and orphanage visits (both impermissible), project visits, visits to communities, villages, and indigenous groups, or in hotels. As a result, children often do not attend school or are discouraged from learning if they contribute to their families' income generation in this way. Whenever children become part of the tourism value chain, there is a risk of commercial exploitation and blurring of the lines between voluntary promotion of cultural heritage and child labour.

Illegal child labour can occur in a wide variety of contexts and often takes place in the background: in souvenir production, luggage transport, escorting, or caring for vehicles, working in laundries, on plantations, in food processing and in other scenarios. Even if child labour is less visible in the immediate tourism value chain, risks exist in upstream activities.

The study "Focus on children's rights – Shaping the restart in tourism" by ECPAT, Bread for the World – Tourism Watch and the Roundtable Human Rights in Tourism shows that one out of ten children worldwide has to work in order to contribute to the family's livelihood. Approximately half of them even work under conditions that pose a risk to the health, safety, or morals of children, although this is prohibited under the ILO Convention for persons under the age of 18. The ILO Minimum Age Convention 138 stipulates that the minimum age for work shall not be less than the age of completion of compulsory schooling and, in any case, shall not be less than 15 years. Exceptions exist only for light, non-hazardous work performed by young people aged 13 and above for a limited period of time, outside school hours (see details in chapter 7.1. 'Definitions').

Any form of child labour in the products of DER Touristik Group is not permitted unless the age limits defined by the ILO are observed. For this reason, **DER Touristik Group implements a code of conduct for suppliers with commitment to the ILO Minimum Age Convention.**

The following age limits must be strictly observed and complied with in tourism activities and performances involving children:

13 years Light work

- Light, age-appropriate work to assist in the family business or to earn pocket money that is not dangerous to the child's health and development
- No negative impact on the child's education and on school, study, play or sleep times or vocational orientation programmes
- No continuous work, i.e., basically within a narrow time not exceeding 2 hours a day, only after school or during holidays
- No exploitative conditions
- Supervision of the child by parents or other guardians is necessary to ensure compliance with the above mentioned points

15 years Starting age for work subject to conditions

- The right of juvenile workers to employment must be respected, and juvenile workers must not be excluded from work because of their age
- Heavy, hazardous, or mentally stressful work is not permitted
- Young people must not be employed on night shifts or in work that is hazardous to their health or immoral
- Safety and social development must not be impaired
- Employers must comply with all legal requirements for employment and maintain personnel lists and job descriptions
- Evidence of further training in occupational health and safety and health checks must be provided
- Overtime is not permitted. The combination of work time, school time, and commuting time must not exceed ten hours

18 years Starting age for work

- All legal regulations must be complied with
- Health and safety regulations in particular must be complied with

These requirements also apply especially to performances, dances and shows, where they are often neglected. **The extent to which children's rights are protected in the respective offerings must be examined on a case-by-case basis.** For this purpose, in the case of the participation of persons under the age of 18, the age of the participants in the performance must be enquired when the contract is concluded. The participation of persons under the age of 15 must be prohibited if the time limit according to the Minimum Age Convention cannot be met without doubt. **In unclear cases, the Human Rights and Child Safeguarding Officer of DER Touristik Group is to be contacted at any time for advice and individual assessment.**

Voluntourism (Volunteer Tourism)

Voluntourism or volunteer tourism means that travellers do voluntary work in order to support communities or environmental projects. If the travellers are sufficiently qualified and the trips are well organised, this form of tourism can make a positive contribution to the project and to the volunteers' personal development. However, volunteers are often not deployed according to their qualifications or are not adequately prepared, so that background information on cultural characteristics and professional knowledge may be missing. Language barriers may also arise. Volunteering opportunities where travellers work with children such as teaching English at schools or providing childcare at orphanages are particularly popular. In the absence of child safeguarding measures, children may be exposed to intentional or situational sexual and physical assaults. If volunteering commitments only last a few hours, days or weeks the children's caregivers and attachment figures change very frequently. The constant change can have a negative impact on the children's development. Potential consequences can be attachment disorders as well as learning difficulties and the inability to build relationships. As volunteers often pay money to the volunteering recruitment companies for their commitment institutions can become financially dependent on the volunteers while at the same time forcing local professionals out of employment.

Before considering a volunteer placement, it is necessary to actively address the risks involved. The organisation of responsible volunteering programmes is a task for highly specialised tour operators who are able to take intensive care of both the projects in the destination countries and the volunteers in the country of origin. Careful preparation of the stay and the selection of suitable candidates and activities are essential. **DER Touristik Group will no longer offer voluntourism products** since the criteria mentioned above cannot be guaranteed. **People interested in voluntourism are advised to read the Voluntourism Policy** (<https://thecode.org/voluntourism/>) **of The Code** and to contact providers who implement it.

5. MEASURES AND OBJECTIVES

The implementation of the DER Touristik Policy Statement on Child Safeguarding requires measures and processes which are implemented by the responsible units among the group. These include **training of employees, awareness-raising of stakeholders** (e.g. members of the industry and partners) and **clients, building networks, monitoring the implementation of requirements, creating reporting and escalation processes in case of suspected cases or violations as well as reporting on implemented measures.**

5.1. Training for Employees and Partners

Training for employees and partners is primarily intended to raise awareness and enable them to act in the event of suspected cases and violations against children's rights. Specifications for training contents and objectives for the implementation of the training are defined by the Corporate Responsibility Group department together with the specific units and specialist departments.

The Corporate Responsibility Officers of the international divisions (Central Europe, Northern Europe, Eastern Europe) as well as the hotel division and the DMC division coordinate the implementation of the training of the units. Within the respective units (tour operators, destination management companies or hotels), the Corporate Responsibility Officers (e.g. the Sustainability Officers of the DMCs) implement the trainings in the respective destination area or at the respective location.

The training can be carried out internally by the DER Touristik Group's Human Rights and Child Protection Officer, employees of the Sustainability Departments / Corporate Responsibility Departments of the international divisions or external trainers from child protection organisations. The internationally active child protection organisation ECPAT provides trainers who can be requested via the ECPAT network and deployed in destination areas, depending on availability. Training budgets are to be planned by the tour operators as well as the DMC and the hotels of DER Touristik Group.

Training material (in German and English) for different target groups is provided centrally and can be adapted to the needs of the respective target groups in coordination with the Corporate Responsibility Group. Depending on the respective requirements, training materials and concepts can also be created individually – for example in cooperation with local child protection organisations – whereby minimum content requirements must be met in coordination with the Corporate Responsibility Group department. Generic training differs in format and content depending on the respective target group:

TARGET GROUP-SPECIFIC TRAINING FORMATS

Product, Purchasing, Contracting, DMC, Tour Management	<ul style="list-style-type: none"> Comprehensive training on children's rights & product requirements (webinar & live)
Homestay & Projekte	<ul style="list-style-type: none"> (Online-) Training for homestays & projects with specific focus & requirements
DER Touristik Hotel Division	<ul style="list-style-type: none"> Comprehensive on-site training for employees of Hotel Division Group Webinar-based training for employees of Hotel Division
Partner Hotels	<ul style="list-style-type: none"> Reference to training offers for partner hotels (online short training) provided by The Code or ECPAT
Marketing, Communication, Sales, Travel Agency	<ul style="list-style-type: none"> Webinar-based short training for employees
All employees	<ul style="list-style-type: none"> Online training on children's rights Online training provided by The Code on the prevention of sexual exploitation

The number of the trained employees as well as of the trained homestay and project partners will be monitored. Reporting on training in the prevention of sexual exploitation of children in tourism

to The Code will be carried out annually by the Human Rights and Child Safeguarding Officer of DER Touristik Group in coordination with the Corporate Responsibility Officers of the individual divisions and the Corporate Responsibility Officers of the individual units respectively countries. Training courses that employees have attended on the The Code platform are registered automatically and do not have to be recorded manually as is the case with training formats DER Touristik Group implemented itself.

Training for staff and selected partners is a key element in child protection. They allow for awareness-raising among key stakeholders and create capacity for action in eliminating risks and dealing with violations of children's rights. Resources on online training for the prevention of sexual exploitation are listed in chapter 7.3 Resources. Further training material on children safeguarding will be successively made available in the Toolkit (see chapter 7.3).

5.2. Awareness-Raising of Stakeholders

DER Touristik Group raises awareness among its stakeholders about children's rights and child safeguarding in tourism. This includes not only employees but also partners and representatives of the industry as well as customers.

Partners

For partners such as homestays or projects, measures to raise awareness are part of the product requirements. They will be sensitised to the issues of children's rights and child protection through appropriate training (see chapter 5.1. 'Training for Employees and Partners' and chapter 4.3.2. 'Requirements for Host Families and Project Visits').

Members of the Industry

Industry members are sensitised as part of the committee work of DER Touristik Group. Creating networks (see the following chapter 5.3. 'Creating Networks and Stakeholder Dialogue') is intended to establish committees at different levels and in different source and destination areas to allow for broader parts of the industry to get involved in order to achieve a more comprehensive impact of child safeguarding.

Do's and Don'ts for Travellers

Information for travellers will be made available for use on the websites of tour operators, hotels and destination management companies (DMCs). For this purpose, the information on the website <https://www.dertouristik.com/kinderschutz/> may be replicated. Recommended actions for travellers on child safeguarding are provided below. These also refer to contacts of travellers with children outside the tourism value chain, in the environment of tourism infrastructure and in the informal sector.

Photography

Photos are a way of capturing memories of the travel. However, care should be taken when people and children are depicted. In any case, photos should always respect the dignity and culture of each individual depicted. **Photos should never be taken without the consent of the person to be photographed or the parent or guardian.** Children in particular are less able to speak for themselves and need the protection of responsible adults. As an alternative, a group of people can be chosen as the motif so that the focus is not on individual persons. If in doubt, refrain from taking a photo or consider taking photos of landscapes and sights instead. If, for example, holiday photos of children are shared on social media without consent, the right to one's own image is violated.

Begging, Gifts and Monetary Donations

In many tourist destinations, children offer souvenirs and services or beg. Travellers often accept these offers or donate money with good intentions. Without knowing it, they perpetuate the vicious circle of lack of education and poverty. In many places, children are part of organised "begging gangs" and are commercially exploited. The possibility of using children to generate income through tourism is often the reason why this option is preferred to school attendance in the first place. In this way, alms actually reinforce exploitative structures. Gifts addressed to children can also convey the image that tourists are superior or generally trustworthy. Moreover, sweets can be harmful to the children's health, especially if dental hygiene is poor. Travellers are therefore advised **not to give gifts and money directly to children.** Instead, money can be donated to reputable organisations that promote sustainable support for children and families. Appropriate gifts and donations in kind should be addressed to parents, caregivers or organisations and, if possible, coordinated in advance.

DER Touristik Foundation (<https://www.dertouristik-foundation.com/>) is such a non-profit organisation that is committed to promoting the education of children, young people and women in less developed travel countries.

Travellers as Role Models

Travellers should **be aware of their own role model function for children and young people in the destination areas.** For example, excessive alcohol consumption should be avoided when children are present. Respect for people, nature and animals should be maintained at all times. In this context, it is important to familiarise oneself with the cultural characteristics of a destination, for example by means of travel guides and literature. In case of uncertainties, the qualified tour guide can be asked for advice.

Don't Look Away – Seek Professional Help in Suspected Cases

As soon as it becomes apparent that a child could be in danger, be it because of **suspected sexual violence, child labour** or other situations in which **children's rights could be violated**, it is important to act immediately and show civil courage (see chapter 5.5. 'Reporting Processes').

The aim of raising awareness among various stakeholders is to involve both the industry and travellers in the protection of children's rights and thus to develop the greatest possible leverage within the value chain as well as in the informal sector.

5.3. Creating Networks and Stakeholder Dialogue

DER Touristik Group is in continuous dialogue with stakeholders such as child safeguarding experts and other relevant groups involved in child safeguarding. It is a member of the "Roundtable Human Rights in Tourism", the Child Safeguarding Working Group of the German Travel Association (DRV), the Sustainable Tourism Working Group of the British travel association ABTA and other bodies and industry associations. It is in constant exchange on current developments with child protection organisations such as ECPAT and their worldwide partner organisations as well as authorities. Their joint commitment is to work together on awareness-raising campaigns and to implement cross-industry initiatives to uphold children's rights and prevent the exploitation of children in tourism. DER Touristik Group is also a signatory to "The Code", the code of conduct for the protection of children from sexual exploitation in tourism.

All business units of DER Touristik Group are equally called upon to actively participate in creating networks to uphold children's rights and protect children. This applies in particular to organisations in the destination areas. Cooperation with local child protection organisations makes it possible to identify risks in the respective destination and to offer professional support and assistance with remedial measures in the event of violations of children's rights or cases of sexual exploitation. Support and cooperation with stakeholders in child safeguarding is also a criterion to be fulfilled as a signatory of The Code (criterion no. 5, see chapter 4.3. 'The Six Criteria of the Code').

Cooperation with child protection organisations makes it possible to identify risks in the respective destination and to offer professional support and assistance with remedial measures in the event of violations of children's rights or cases of sexual exploitation.

5.4. Implementation and Monitoring of Requirements

The various levels of the value chain are equally responsible for implementing the product requirements. DER Touristik Group is responsible for ensuring that its tour operators implement the requirements. The tour operators ensure that their destination management companies implement the requirements, and the destination management companies ensure that the

respective partners implement the requirements. In particular, the contracting parties must check with the respective partners in the course of concluding the contract whether the respective requirements have been met or to communicate these and to work with the partners on successive implementation.

As part of an **annual portfolio analysis carried out by DER Touristik Group, the relevant products are identified** and evidence of implemented measures and monitoring is requested from the individual business units. Activities that do not comply with the guideline and whose conformity cannot be established are to be replaced by complying activities in the process of product design, purchasing and contracting or to be discontinued if necessary.

For shows, performances and other activities involving persons under the age of 18, the age of the actors involved and details of the extent of their employment shall be requested and documented at the time of contracting and renewal. The questionnaires will be provided as part of the Toolkit (see chapter 7.3. 'Resources').

When host families and project visits are involved, the implementation of the requirements (for details see chapter 4.3. 'Product Requirements') includes that partners are informed about the requirements by the contracting party – for example the local Destination Management Company – and are sensitised via the short trainings provided for this purpose. Participation in the training must be documented. Whether risks exist and partners fulfil the requirements is checked regularly at the time of contract renewal and at the latest annually by means of questionnaires. The questionnaires will be provided as part of the Toolkit (see chapter 7.3. 'Resources').

For the establishment of conformity with all requirements that go beyond the legal and institutional requirements, a transitional period applies until the next conclusion of the contract or of a maximum of one year from the notification of the requirements to the respective contracting party. If it is determined during the annual inspection that conformity has not been established, the contract can only be renewed until conformity has been demonstrated.

Monitoring the implementation of measures during homestays and project visits ensures that the requirements of this guideline are met. Thus, an active contribution is made to safeguarding children's rights. Monitoring also allows risks to be identified and successively eliminated.

5.5. Reporting Processes and Case Management

Information on suspected cases and violations of children's rights makes it possible in the long term to **review the effectiveness of the requirements and measures set out in the Child Safeguarding Guideline**. In the short term, it provides support to those affected with the help of stakeholder networks and child safeguarding experts.

5.5.1. Reporting and Escalation Mechanisms of DER Touristik Group

In the event that employees of DER Touristik Group become aware of violations against children's rights, or if there are suspected or proven cases of sexual exploitation of children in tourism, it is **mandatory to report to the Human Rights and Child Safeguarding Officer of DER Touristik Group**.

1. Reporting path about the escalation via mail

Any suspicion has to be reported to the Corporate Responsibility Group department at nachhaltigkeit@dertouristik.com or cr@dertouristik.com with inclusion of superiors and (if available) Corporate Responsibility Officers of the respective unit (e.g. Sustainability Officer of a destination management company) and division at international level (see chart).



2. Direct reporting

A report can also be made directly without involving other persons, with the request for confidentiality regarding the reporting person: nachhaltigkeit@dertouristik.com or cr@dertouristik.com

3. Anonymous reporting channel via the REWE Group Hint Box

In addition, REWE Group will provide an anonymous Hint Box as part of the measures to implement human rights due diligence: <https://rewe-group.reporting-channel.com/>. This is a public platform and therefore also accessible for external stakeholders.

The Human Rights and Child Safeguarding Officer advises and coordinates the respective business unit in case management in cooperation with external child safeguarding experts. The aim of the internal reporting process is first of all to provide support to those affected. Support measures are evaluated and coordinated centrally in cooperation with the business units involved and with the respective child protection organisations in the DER Touristik Group network and in the respective destination areas. For this purpose, the Human Rights and Child Safeguarding Officer will set up an ad-hoc advisory body for case management. Within this body, decisions are made on a consensus basis and as balanced and interest-free as possible.

In addition to offering support and compensation, dealing with violations requires a root cause analysis. Corrective measures and adjustments to the policy must be made if it becomes apparent that requirements and measures are not effective. Depending on the frequency and severity, cases and their resolution shall be reported to the management on an ad-hoc basis or at regular intervals.

5.5.2. External Reporting Platforms

One focus of DER Touristik Group's child safeguarding programme is the **prevention of sexual exploitation of children in tourism**. Employees, partners and particularly travellers are sensitised and made aware of the possibility of reporting suspected cases via the reporting platform <https://dontlookaway.report/>.

All observations are then passed on to the child protection organisation ECPAT or the relevant law enforcement agencies. The portals have proven effective in preventing the sexual exploitation of children in tourism.

DER Touristik Group will not receive any information on individual reports submitted to this platform. Therefore, in addition to reporting via the external platform, employees are requested to submit reports via internal reporting mechanisms.

The aim of internal and external reporting processes is to record all violations against children's rights or suspected cases if possible, to identify risks and to support those affected.



Don't look away!
Report suspected cases of sexual exploitation of children:
<https://dontlookaway.report/>

5.6. Reporting

The annual reporting on child protection is carried out via the sustainability report of REWE Group as the parent company of DER Touristik Group. It follows the GRI Standards 2–23 Product-Related Risk Analyses, 408 Child Labour and 409 Forced or Compulsory Labour, and 413 Local Communities.

In addition, annual reporting on the implementation of the six criteria of “The Code” for the prevention of the sexual exploitation of children in tourism is carried out at DER Touristik Group level. The report is published on The Code’s online platform and includes the latest version of the external Policy Statement on Child Safeguarding, the number of employees trained in the respective reporting year, evidence of the zero tolerance clause regarding the sexual exploitation of children in partner contracts, evidence of awareness-raising among travellers and information on the cooperation with stakeholders.

As part of the internal reporting on human rights due diligence, annual reports are submitted to the Executive Board and Extended Executive Board on the implementation of measures and requirements for the protection of children and in particular on suspected cases or violations of children’s rights.

The aim of reporting on child safeguarding is to make activities to protect children and children’s rights transparent and measurable in order to raise awareness of this issue and related measures among stakeholders.

6. COMMUNICATION

DER Touristik Group raises awareness of children’s rights and child safeguarding among its customers and partners. For this purpose, a Toolkit with relevant material is provided (see chapter 7.3. ‘Resources’). Information on child safeguarding is to be replicated or linked on the business units’ websites. Strategy-related content created by business units themselves must be coordinated with the Human Rights and Child Safeguarding Officer of DER Touristik Group.

DER Touristik Group aims to use effective and appropriate language in its communication. Texts and images are not neutral, but reflect the position of the child in society and the company’s attitude towards the child. This applies both to the portrayal of children in tour operators’ advertising and to reporting on children as part of initiatives by DER Touristik Group companies or projects by DER Touristik Foundation. Terminology and images must correctly reflect facts, ideas and concepts and should not be manipulative. Particularly when it comes to issues such as sexual violence and exploitation of children, sensitivity is required with regard to terminology and its impact.

In the **portrayal, the dignity, privacy and the right to the protection of personal data of children must be guaranteed**. Portrayals should generally **put children in a positive light** while **recognising their need for safeguarding**. At the same time, portrayals should never stigmatise children. Positive communication gains the attention of the addressees and should always highlight the opportunities and possibilities for all involved. A term like “fear” can be replaced by “hope”, “against” by “for” and instead of emphasising a “problem”, the focus can be on the “solution”. The wording has a direct impact on the reception of a text by the addressees.

TIP: Always ask yourself: “Would I want this for my own child or niece/nephew? Would I present her/him like this in this context?”

It is impossible to anticipate every single question when creating texts and selecting images. However, as a guide, the following are some basic requirements for terminology and imagery in the context of children. In case of doubt, content should be coordinated with DER Touristik Group’s Human Rights and Child Safeguarding Officer.

6.1. Terminology

According to the definition of the UN Convention on the Rights of the Child as set out in chapter 7.1., children are persons below the age of 18 old. Other terms, such as “young person” or “teenager” need to be assessed differently and do not necessarily allow conclusions to be drawn about the age and the associated legal status of a person.

Especially when protecting children from different forms of exploitation, including sexualised violence and sexual exploitation, sensitive language is needed. It should never stigmatise, turn victims into perpetrators or relativize acts of violence. Language should always be culturally and gender sensitive. In order to ensure that the language used in relation to the topic of sexual exploitation of children and sexualised violence is appropriate, DER Touristik Group is guided by the “Terminology Guidelines for the Protection of Children from Sexual Exploitation and Sexual Abuse”, or “Luxembourg Guidelines”, which were developed on the initiative of the child protection organisation ECPAT by an inter-institutional working group (ECPAT International, ECPAT Luxembourg (2016); see also chapter 7.3. ‘Resources’).

There are terms that can be used without hesitation in the context of protecting children from sexual violence and exploitation. Their meaning is generally accepted, unambiguous and does not harm the child through stigmatisation or the like (symbol: **O**). For other terms, there is disagreement on how they should be used. Special attention should be paid to how this term is used (symbol **Ø**). The use of other terms should be limited or avoided completely (symbol: **⊗**).

Below, you find examples for three common terms:

O “Sexual exploitation of children” (in the context of travel and tourism)

This term appears to have a generally agreed meaning and/or can be used without stigmatising and/or otherwise harming the child.

“What distinguishes the concept of child sexual exploitation from other forms of child sexual abuse is the underlying notion of exchange present in exploitation. However, it must not be overlooked that the bartering is done on the child’s back, even if the child receives something in return. Similarly, the idea of exploitation is arguably applicable to all victims of abuse in the sense of exploiting the vulnerability of a child.” (Luxembourg 2016: 25, 60. abridged).

Ø “Teenager”

Special attention should be paid to how this term is used.

Correct: Child

“The term ‘teenager’ is closely related to that of ‘adolescent’, and these two terms are often defined in an identical fashion, in particular with regard to the upper age limit of 19 years. The term ‘teenager’ has, semantically speaking, a very clear definition: it means a person between 13 and 19 years of age—that is, a person in her/his ‘teens’—thus refers in the English language to the suffix ‘teen’ in the words ‘thirteen’, ‘fourteen’, and so forth. While there is no particular indication against the use of this term, care should be taken when it is used in the context of child sexual exploitation and sexual abuse, so as to distinguish between teenagers up to age 18 and teenagers

aged 18 and above, and to ensure teenagers under the age of 18 are granted the rights and protection accorded to all children.” (Luxembourg 2016: 10).

⊗ “Child prostitute”

The use of the term should be avoided.

Correct: Exploitation in/for prostitution

“In order to avoid the risk of stigmatising children exploited in/for prostitution, or of inadvertently legitimising such practices, it is preferable to use terms other than “child prostitution” to define this phenomenon, in particular in non-legal contexts. Moreover, it is noteworthy that, while the qualification of the act under international law is still to be found in existing legal documents, which often use the term “child prostitution”, nothing prevents States from using other, more suitable terms to criminalise the same acts. “Exploitation in prostitution” or “exploitation for prostitution” arguably represent a more appropriate way to address the issue, because it underlines the element of exploitation of the child and leaves no doubt as to the fact that the child is not to be held responsible for the acts that follow from her/his situation.” (Luxembourg 2016: 30).

SOME OF THE MOST COMMON TERMS ARE LISTED BELOW ACCORDING TO THEIR RECOMMENDED USE:

O Terms with a generally accepted meaning	Ø Terms that should be used with caution	⊗ Terms to be avoided
Sexual exploitation of children (in the context of travel and tourism)	Commercial sexual exploitation of children	Child prostitute
Child sexual assault	Children in prostitution	Child sex workers
Sexual violence against children	Travelling child sex offenders	Child sex tourism
Exploitation of children in/for prostitution	Teenagers	Child sex tourists
Perpetrators of sexual crimes against children	Transnational child sex offenders	
Child sexual molestation		
Child sexual abuse		
Sexual abuse of children		
Sex offender		

A complete list of terms and detailed information on terminology in connection with the protection of children from sexualised violence can be found in the guide available at <https://www.terminologie.ecpat.de/> and <http://luxembourgguidelines.org/>. A practical guide is the Term Check summary: <https://www.terminologie.ecpat.de/leitfaden-fuer-angemessene-sprache/begriffs-check/>. The documents are listed in chapter 7.3. 'Resources'. Further general definitions of terms used in this Guideline can be found in chapter 7.1. 'Definitions and Abbreviations'.

Term Check in connection with sexualised violence: <https://www.terminologie.ecpat.de/leitfaden-fuer-angemessene-sprache/begriffs-check/>

6.2. Imagery

Images are directly connected to the context they visually convey. Their careful selection is therefore just as important as appropriate wording. An image conveys a statement regarding the attitude towards the child and should therefore be related to the accompanying text or other content. Due to the diversity of motifs, contexts and associations, it is virtually impossible to define specific requirements regarding the selection of appropriate images. For this reason, only basic guidelines for suitable motifs can be provided here. In case of doubt, please contact the Human Rights and Child Safeguarding Officer of DER Touristik Group.

When depicting children, the dignity, personal rights and the right to one's own image of the children portrayed must be respected and guaranteed in all cases. **Publication should not take place without the consent of the child and the parent or guardian.** When selecting suitable content, the statements that images make about the children depicted should always be questioned. A child should not be portrayed as a helpless or will-less being, but as a person at eye level to the viewer. Pictures that show children in the reality of their lives and in relation to other people within a group direct the view from the individual to the community.

The depiction of nude children as well as lascivious, sexualising or ecstatic poses should be avoided. If children are shown in swimwear, this clothing should not be too skimpy and the children should ideally be shown in the context of their family. Close physical contact (hugging, sitting on the lap, etc.) between adults and children should only be depicted if it is clearly a family context and not, for example, children from the target area and adults from the area of origin or vice versa. **Images of children must not depict impermissible activities:** For example, **tourist visits to schools or orphanages or volunteering with children.** Similarly, images of activities that contradict ILO Minimum Age Convention No. 138 are not permitted, such as children under 18 doing hazardous work or children under 15 being shown working (see chapter 4.3.3. 'Impermissible Products').

EXAMPLE 1 – TOURISTIC PRODUCTS

When selecting images, special attention must be paid to aspects such as nudity and the context in which children are shown. The example shows how critical images of children can be replaced by more sensitive pictures.



When communicating on the issue of sexual exploitation of children in tourism, it must be avoided that the depicted children can be identified, i.e. their faces should not be recognisable. At the same time, the images should at best not allow a clear conclusion to be drawn about the gender in order to show that the protection of children's rights and protection against sexual exploitation concerns all children regardless of gender. Especially in the context of this topic, physicality should be avoided in the depictions. Instead of depicting children, symbols can be used that are typically associated with children.

EXAMPLE 2 – AWARENESS-RAISING OF CHILD SAFEGUARDING

In child safeguarding awareness communication, children should never be portrayed in a stigmatising, recognisable or body-emphasising manner. Depictions should be gender neutral. Children should not be portrayed as potential victims, but as individuals and in a positive light. The use of images that symbolically represent children can also be considered.



Key Visual

A key visual as a picture and textual messages exists for communicating child safeguarding. The image of the key visual can be used as a whole or in sections. The image can be supplemented with text: **Children's rights never go on holiday** (example below). A further addition can be made: **Children's rights never go on holiday. Find out how we protect children on journeys together.**



The key visual is part of the DER Touristik Group Child Safeguarding Toolkit which includes the policy statements (German, English), the guideline (German, English) as well as further resources on the issue of child safeguarding and will be successively complemented (see chapter 7.3. 'Resources').

7. FURTHER INFORMATION

7.1. Definitions and Abbreviations

Volunteer tourism: see Voluntourism

Hazardous child labour: The ILO Convention 182 Concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour, adopted in 1999 defines hazardous child labour as work which is likely to harm the health, safety or morals of children. What work this includes in detail is determined individually by UN member states. According to the Convention which has been ratified by 173 of 183 UN member states, such hazardous work is prohibited for children under 18 years of age.

Homestay: A form of accommodation where guests share the homes of their hosts. This can be free of charge, i.e. accommodation services in exchange for help in the household, or as is common in the tourism context, against payment. A homestay allows the guest to gain a deeper insight into the daily life of the host community as well as cultural exchange between hosts and guests. Homestays can be an opportunity for communities to participate in tourism value creation. Within the context of homestays, children are exposed to certain risks and must therefore be particularly protected.

Juvenile labour: Juvenile labour refers to work carried out by a person who has reached the minimum working age but is not yet 18 years old. Young people are entitled to basic labour rights. In principle, the legal provisions and the conventions of the International Labour Organisation (ILO) apply. In addition to requirements that apply to all workers, young

people are not allowed to carry out hazardous or mentally stressful work.

In the Minimum Age Convention No. 138, the UN International Labour Organisation (ILO) stipulates that the minimum age for admission to employment shall not be less than the age of completion of compulsory schooling and, in any case, shall not be less than 15 years. Exceptions are only permitted for light, non-hazardous and non-mentally stressful work for a limited period of time outside of school hours or during holidays to help in the parental household, in the family business or to earn pocket money, which is permitted to young people from the age of 13.

Youth: Different institutions have different definitions for youth and young people. The UN General Assembly defines youth as persons between the ages of 15 and 24 years. Within this category, another distinction is made between teenagers (13 to 19 years of age) and young adults (20 to 24 years of age). Furthermore, the UNO refers to persons between the ages of ten and 24 years as 'young people'. Irrespective of the above, the UN Convention on the Rights of the Child uses the term 'child' for young people up to the age of 18 years. Within the context of labour and employment, however, different age restrictions apply (see chapter 4.3.3. 'Impermissible Products – Child Labour').

Child: In the UN Convention on the Rights of the Child, the term "child" is defined as any person under the age of 18 years old.

Child Labour: The UN Convention on the Rights of the Child (CRC) defines child labour as work performed by persons under the age of 18 years that is likely to be hazardous or to interfere with their education (CRC, Article 32).

According to UNICEF, child labour includes all types of work for which children are too young, which are hazardous or exploitative, which are harmful to their physical and mental development, or which prevent them from attending school. It violates the worldwide applicable children's rights.

In the Minimum Age Convention No. 138, the UN International Labour Organisation (ILO) stipulates that the minimum age for admission to employment shall not be less than the age of completion of compulsory schooling and in no case less than 15 years. Exceptions are only permitted for light work for a limited period of time outside of school hours or during holidays to help in the parental household, in the family business or to earn pocket, which is permitted to young people from the age of 13, excluding hazardous and mentally stressful work. The worst forms of child labour include slavery or practices similar to slavery, the sexual exploitation of children, the use, procuring or offering of a child for illicit activities as well as work which is likely to harm the health, safety or morals of children.

Child Safeguarding: Child safeguarding comprises the active protection of children's rights. Every child is entitled to comprehensive protection from all forms of commercial exploitation and sexual abuse. The focus of child safeguarding often lies on the prevention of sexual exploitation.

Act on Corporate Due Diligence Obligations in Supply Chains: The German Supply Chain Act (Lieferkettensorgfaltspflichtengesetz; LkSG)

came into force on 1 January 2023. It is the first law that regulates responsibility of companies to respect human rights within their supply chains. The due diligence obligations contained therein include, among other things, the prohibition of child and forced labour. From 2023, this law applies to German companies with headquarters, central office, administrative headquarters, registered office or branch office and 3,000 employees in Germany and from 2024 to companies with 1,000 or more employees in Germany.

Sexual Exploitation: The terms "sexual abuse" and "sexual exploitation" are central to describing violations of children's rights of a sexual nature and are well established in international law. Article 34 of the UN Convention on the Rights of the Child refers to the exploitative use of children in prostitution and other unlawful sexual practices, as well as the exploitative use of children in pornographic performances and depictions. The African Charter on the Rights and Welfare of the Child (1999) refers in particular to the inducement, coercion or encouragement of a child to engage in any sexual activity. The term exploitation plays a key role here, as it emphasises the barter aspect that is part of exploitative practices, in contrast to sexual violence and sexual abuse.

Sexualised Images of Children (Posing): "Posing images" are images of children who pose partially clothed or nude with particular emphasis on the sexualisation of the child, i.e. an unnaturally sexualised posture and sexually suggestive depictions of nude body parts, such as the child's buttocks.

Volunteering: Volunteering or voluntourism refers to organised tourism services whose main objective is to involve travellers in voluntary work. Such assignments can last a few hours up to several months. While volunteers pay for

placement, the work they do is usually unpaid. The concept often involves international travel with placements in environmental and animal welfare projects or in the context of projects whose beneficiaries belong to underprivileged social groups. This can result in potential risks for children and young people.

Orphanage: While the formal terminology refers to the so-called "institutional care", the term "orphanage" is widely used. It refers to the institutional placement and care for children who have lost one or both parents. It summarises various forms of placement such as residential homes, (small) group homes, boarding schools, shelters, transitional quarters, children's homes, children's villages and the like. Residential care refers to various forms of group accommodation for children who are cared for by staff. In the context of tourism, visits to such facilities enjoy a certain popularity, although the term orphanage is not necessarily representative: many of the facilities of this kind used for tourism accommodate children who are not orphans at all.

Abbreviations

DMC: Destination Management Company

ECPAT: Originally 'End Child Prostitution in Asian Tourism' and later 'End Child Prostitution, Child Pornography & Trafficking of Children for Sexual Purposes'; designations no longer in active use. In Germany: Arbeitsgemeinschaft zum Schutz der Kinder vor sexueller Ausbeutung e.V. (Working Group for the Protection of Children against Sexual Exploitation)

ILO: International Labour Organization

NGO: Non-Governmental Organization

OECD: Organisation for Economic Co-operation and Development

UNGC: United Nations Global Compact

UNGP: United Nations Guiding Principles on Business and Human Rights

UNICEF: United Nations International Children's Emergency Fund

UNO: United Nations Organization

7.2. Stakeholders

Important stakeholders with whom DER Touristik Group cooperates for the protection of children's rights and for safeguarding children in tourism are listed below. These stakeholders enable access to further networks, especially in building capacities for child safeguarding in the respective source and destination areas. The stakeholders ECPAT Deutschland e.V., Kindernothilfe e.V. and Tourism Watch / Brot für die Welt were involved in the development of this Guideline as part of a stakeholder review process.

ABTA Sustainable Tourism Committee – ABTA is a trade association for UK travel agents, tour operators and the wider travel industry. The focus of ABTA's work is to help members run successful travel businesses and provide travellers with advice, guidance and support. [Sustainability | ABTA](#)

DRV AG Kinderschutz – The Deutsche Reiseverband (DRV) (German Travel Association) represents the tourism industry in Germany. The DRV AG Kinderschutz (DRV's Child Safeguarding Working Group) is committed to raising awareness and informing travellers as well as employees of the travel industry in order to protect children from sexual assault. [Kinderschutz: DRV](#)

ECPAT Deutschland e. V. – Working Group for the Protection of Children against Sexual Exploitation – is a nationwide association of 28 institutions and groups. ECPAT Germany is member of ECPAT International, an international children's rights organisation. Today, the network has 122 members in 104 countries. (As of September 2021) The members in the respective destination areas are partners for the exchange on

destination-specific problems and the implementation of measures. [Ecpat Deutschland e.V. – Arbeitsgemeinschaft zum Schutz der Kinder vor sexueller Ausbeutung](#)

Kindernothilfe e.V. – Kindernothilfe is one of the largest non-governmental development cooperation organisations in Germany. Its work is focused on the commitment against violence, for education, against child labour and for the participation of children. [Kindernothilfe: Seit über 60 Jahren Hilfe für Kinder in Not](#)

Roundtable Human Rights in Tourism – Roundtable Human Rights in Tourism e.V. is a non-profit association and an international multi-stakeholder initiative for the promotion of human rights. Roundtable acts as an open network to support tourism companies on their way to respecting human rights in tourism according to the United Nations Guiding Principles on Business and Human Rights by preventing human rights violations along their supply chains in their business activities. [Roundtable Human Rights in Tourism \(human-rights-in-tourism.net\)](#)

The Code – The Code of Conduct for the Protection of Children from Sexual Exploitation in Travel and Tourism is a multi-stakeholder initiative aimed at combating the sexual exploitation of children in tourism. The Code provides tools and support to raise awareness for this topic and defines roles and responsibilities within the industry in relation to the sexual exploitation of children in tourism. The Code works with travel agencies and tourism companies to fight these crimes. [The Code – We protect children in travel and tourism](#)

Tourism Watch – As the specialist unit of the Policy Department of the German charity "Brot für die Welt" (Bread for the World), Tourism

Watch works together with ecumenical partners from all over the world to promote sustainable, socially responsible and ecologically compatible tourism. Their focus lies on issues such as commitment to human rights and social standards, strengthening and networking civil society locally and in European source markets, raising awareness among travellers for a responsible and encounter-oriented tourism and sound public relations and press work. [Tourism Watch | Tourism Watch – Informationsdienst Tourismus und Entwicklung \(tourism-watch.de\)](#)

7.3. Resources

DER Touristik Child Safeguarding Toolkit
The DER Touristik Child Safeguarding Toolkit contains the following:

- Policy Statement on Child Safeguarding (German, English)
- Child Safeguarding Guideline (German, English)
- Key Visual
- Information as well as Do's and Don'ts for travellers to be included in the websites of tour operators and DMSs or in information brochures
- Questionnaires for monitoring the requirements for homestays and project partners
- Questionnaires to enquire about age and activities in shows and performances

The Toolkit will successively be complemented with further material and resources, such as training material, monitoring checklists, etc.

Download-Link: https://teams.microsoft.com/l/team/19%3a_s8tQ2HV3PiAGEE07RU-kNkYm5XOpwDzJ-PpbVqoRcQ41%40thread.tacv2/conversations?groupId=1c74b3d3-a39d-4d0e-91ae-58148a4ff1ce&tenantId=f10d619e-6154-45e4-9879-283640920dca

Contact to request Toolkit:
nachhaltigkeit@dertouristik.com
cr@dertouristik.com

Information on Children's Rights in Tourism
Focus on children's rights – Shaping the restart in tourism (ECPAT 2020): <https://ecpat.de/2022/09/22/kinderrechte-im-fokus/> and https://ecpat.de/wp-content/uploads/2022/09/22_Studie_Tourismus_Digital-1.pdf

Information on the Sexual Exploitation of Children in Tourism

Global Study on Sexual Exploitation of Children in Travel and Tourism (ECPAT International, 2016, English, Spanish): <https://ecpat.org/resource/the-global-study-on-sexual-exploitation-of-children-in-travel-and-tourism/> and <https://ecpat.org/wp-content/uploads/2021/08/Global-Report-Offenders-on-the-Move.pdf>

Terminology Guidelines for the Protection of Children from Sexual Exploitation and Sexual Abuse: ECPAT International, ECPAT Luxemburg (2016): [Terminologischer Leitfaden \(ecpat.de\) / Luxembourg Guidelines – ECPAT](#)

ECPAT Term Check

The Term Check gives you a quick overview of the most relevant terms in connection with the more detailed Terminology Guidelines (see above) <https://www.terminologie.ecpat.de/leitfaden-fuer-angemessene-sprache/begriffs-check/>

Video Information on the Sexual Exploitation of Children in Tourism

Information video: Don't look away: Children need protection – worldwide (ECPAT 2018, German, 2:09min): [Nicht wegsehen: Kinder brauchen Schutz – weltweit](#)

Information video: ECPAT's speak out:**The Sexual Exploitation of Children by Tourists and Travellers**

(ECPAT 2016, English, 3:32min):

[The Sexual Exploitation of Children by Tourists and Travellers](#)

Awareness video: Protect children from child sex tourism in Africa

(Fair Trade Tourism 2015, English, 2:13min):

[Kinderschutz am Beispiel der touristischen Wertschöpfungskette](#)

Awareness video: Witness –**Little souls, big danger...**

(ECPAT 2014, German, 0:45min):

[Witness-Filmspot „Kleine Seelen, Große Gefahr – Nicht wegsehen“](#)

Information video: Child protection and children's rights in tourism

(Naturefriends International 2016, German, 3:31min):

[Kinderschutz und -rechte im Tourismus](#)

Trainings for the Prevention of Sexual Exploitation of Children in Tourism**The Code E-Learning**

Free e-learning (approx. 15–30 minutes) for employees of The Code members. There are several modules for different tourism functional areas available.

<https://thecode.org/e-learning-login/>

E-Learning Code: TOUR8224b927c4

After entering the e-learning code of DER Touristik Group, users can participate in the training by entering their last name, surname, email address, country and their preferred language (several options available). Participation will be taken into account in the annual reporting to The Code. A certificate can be downloaded.

ECPAT Serious Game

Interactive and entertaining method to raise awareness on this topic among tourism professionals and students:

<http://www.ecpat-serious-game.eu/ge.html>

Every child, everywhere, ABTA's online child safeguarding tool

ABTA Knowledge Zone: free training to raise awareness on the safeguarding of children while travelling for ABTA members and their employees. (English):

<https://www.abta.com/industry-zone/education-and-career-development/online-learning>

Kontakt Corporate Responsibility Group:

nachhaltigkeit@dertouristik.com
cr@dertouristik.com

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DER Touristik Group GmbH
Humboldtstraße 140-144
51149 Köln
www.dertouristik.com