

Framework on Safeguarding Children from Trafficking in Sport

Mission 89 and GoodCorporation have developed this framework to help organisations tackle the issue of child trafficking in sport. This framework complements any existing Child Safeguarding Policy.

This framework is designed for all sport organisations, i.e. governing bodies, international federations, and clubs. It draws on best practice models from international organisations like UNICEF, FIFA and StreetFootballWorld. It ensures that key safeguarding controls are in place in the sporting organisation and that these include processes to prevent child trafficking.

Trafficking in persons is defined by the United Nations as “recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation” (Palermo Protocol).

This links directly with child safeguarding, which is defined by Keeping Children Safe as the responsibility that organisations have to make sure their staff, operations, and programmes do no harm to children, that is that they do not expose children to the risk of harm and abuse, and that any concerns the organisation has about children’s safety within the communities in which they work, are reported to the appropriate authorities.

This framework promotes:

- a Code of Ethics that places the special rights of children in sport at its forefront
- the welfare of children in sport that holds all stakeholders, be it major international governing bodies or local sports clubs at grassroots level, accountable for the youth in their care
- harmonisation of rules and regulations to do with the recruitment of children who are players/athletes
- awareness raising and education on issues to do with the trafficking of children in sport

For evaluation purposes, this framework can be used internally as a self-assessment tool or as the basis of an external review which can be conducted jointly by GoodCorporation and Mission 89. Our independent assessment process looks at four levels of evidence for each practice in the framework:

The assessor checks:

That a policy exists
Policy documents are reviewed

That a system is in place to implement the policy
Systems are examined

That records exist that show that the system works in practice
A sample of records is reviewed

That stakeholders agree that the system works in practice
Interviews are held with employees, parents, carers, children, agents, intermediaries and other business partners, and civil society organisations

Framework on Safeguarding Children from Trafficking in Sport

1. Policy and governance

- PG1: There is a safeguarding policy that acknowledges the special rights of children in sport and incorporates anti-trafficking measures where appropriate.
- PG2: There is a demonstrable top-level commitment to the issue of child safeguarding and trafficking in sport as well as the protection of young women and other vulnerable groups.
- PG3: Adequate resources are devoted to implementing and monitoring the policy and supporting processes.
- PG4: There is a process to assess regularly the child safeguarding and trafficking risks of the organisation and to ensure appropriate mitigation measures are in place.
- PG5: Where there may be risks of children being trafficked, the organisation reviews its own processes and those of its business partners to prevent child exploitation.
- PG6: There are adequate policies and procedures that take into account the specific issues regularly faced by young women in sport.
- PG7: Safeguarding policies are developed in collaboration with experts and civil society organisations, based on evidence garnered from research.

2. Culture and awareness-raising

- CA1: The organisation communicates its safeguarding and trafficking policies to its employees, intermediaries and other third parties, and obtains their commitment to abide by it.
- CA2: The organisation informs the parents or guardians or carers of children with whom it interacts about its child safeguarding and trafficking policies.
- CA3: Employees and intermediaries who may come into contact with children as part of their role receive relevant training on the safeguarding and trafficking policies and children's rights.
- CA4: The organisation raises children's awareness of their rights and how to claim and secure them.
- CA5: There is a designated senior manager able to give guidance and advice on safeguarding as well as the prevention of child trafficking to employees, intermediaries and any other third parties.
- CA6: A responsible marketing and advertising policy in relevant geographical areas is in place to ensure that children and their families are aware of the risks of being deceived by false intermediaries.

3. Participation of children in sport

- PC1: The free and informed consent of a parent or guardian is obtained prior to participation by a child in any of the organisation's activities.
- PC2: The organisation ensures that any child involved in its activities has a contract in place which has been agreed to by its parents or guardians or carers. The contract is driven by the best interest of the child, is in line with international norms and in a language that they understand.
- PC3: Any international movement of children involved in the sport is governed by clear written agreements that are driven by the child's welfare and best interests and with the explicit consent of the parents or guardians or carers of the child.

4. Vetting

- V1: There is a process to identify and thoroughly screen those employees, consultants and intermediaries who may come into contact with children as part of their role, both on recruitment and periodically thereafter.
- V2: If intermediaries are used for the recruitment of children into the sport, there is a process to ensure that these organisations are properly vetted and hold appropriate licences and qualifications.
- V3: There is a process to forbid any form of third-party ownership agreement and to ensure that children have the right to freely decide their career choices.
- V4: The adequacy of third parties' policies and standards on child trafficking and safeguarding is checked prior to engagement if they are likely to be interacting with children.
- V5: The organisation places contractual requirements on intermediaries and other third parties to have safeguarding and anti-trafficking measures in place.
- V6: Contracts with intermediaries and other third parties contain the right to audit safeguarding and anti-trafficking practices and incorporate sanctions for malpractice.

5. Providing a safe environment

- PE1: Upon arrival in the country of destination or agreed location, children are treated in compliance with the agreed contracts and any changes to the contract requires the prior, informed consent of the parents or guardians of the child.

- PE2: The organisation ensures that children are not in a situation of debt bondage preventing them from returning home after recruitment.
- PE3: Children are provided with adequate chaperon arrangements and have regular contact with their families.
- PE4: Children have reasonable timetables for sport and education that protect the child's welfare.
- PE5: Children's accommodation is risk assessed and appropriate facilities for children are available, including provision of adequate and sufficient food, with supervision arrangements clearly set out.
- PE6: A process is in place to protect children from sexual harassment, violence and exploitation.
- PE7: Where the organisation has responsibility for transport, there is a process to ensure that children are transported safely both during recruitment and thereafter.
- PE8: The organisation meets children's educational needs beyond proficiency in sport through adequate tutoring and liaising with schools.
- PE9: Controls are in place to protect children using the internet and social media in connection with the organisation.
- PE10: Children's personal data and images are subject to a data protection policy, which is communicated internally, including to the children themselves.

5. Protecting young women

- PW1: A process is in place to educate and protect young women and other vulnerable groups from sexual harassment, violence and exploitation.
- PW2: The organisation communicates to children, the parents or guardians or carers of children with whom it interacts, its employees, intermediaries, and any other third parties on the prevention of gender-based violence in sport.
- PW3: The organisation provides young women with tailored training programmes to support them when they are menstruating and respects their reproductive rights.

6. Monitoring

- M1: There is a regular review of the efficacy of the measures in place relating to safeguarding and the prevention of child trafficking, including whether measures are being complied with in practice.

- M2: The Board regularly considers the organisation's safeguarding and anti-trafficking measures and the adequacy of resourcing and receives regular data on the extent of the exploitation of children in sport.
- M3: The organisation abides by all applicable safeguarding regulations and standards in relation to children in any country in which it works.
- M4: The views of potentially affected stakeholders, including parents or guardians or carers and children, as well as other experts are proactively sought to help review and strengthen policies and procedures.

7. Responding to violations and concerns

- RV1: There is an obligation to report safeguarding and trafficking concerns. This is well communicated and understood by everyone involved with children in the organisation.
- RV2: There is a confidential channel for raising concerns that is well communicated and accessible to adults and children both internally and externally. The issues raised through this channel are addressed in a timely manner.
- RV3: There is an impartial investigation process for dealing with all violations and concerns. All parties involved have a fair chance of being heard and represented.
- RV4: Records of all violations are kept and there is a gatekeeper who has overall responsibility for all violations and concerns.
- RV5: Where appropriate, there is a process for informing the relevant statutory authorities of any child safeguarding or trafficking violations and concerns.
- RV6: There is a process for implementing remedial action following an investigation, both in terms of the specific case and its broader implications.
- RV7: Children, parents or guardians or carers and other parties understand the process and possible remedies.
- RV8: Sanctions are imposed in cases where required practices and behaviour are not followed.
- RV9: Cooperation and child-friendly support are provided by the organisation to children who experience violations in order to remove all barriers, including financial, legal and social, to access justice.
- RV10: Children who experience violations receive psychological support.



#NOTINOURGAME

Mission 89's aim is to mitigate child trafficking in sport through research, education, and the implementation of mandatory regulations to keep sports training academies accountable for the safety and well-being of children in their care.

Mission 89's research into child trafficking in sport will provide a detailed examination of the issue as it exists today, develop educational and vocational programmes at grassroots level to empower those most vulnerable to exploitation, and establish a licensing and accreditation system to differentiate legitimate institutions from sham organisations exploiting young athletes.

GoodCorporation helps businesses understand and manage their ethical risks by advising on best practice, helping them build appropriate practice into their operations and evaluating how well their processes are working.

Business ethics have been GoodCorporation's main focus since its foundation in 2000. Having completed over 600 assessments in 85 countries, GoodCorporation possesses unrivalled benchmark data and real insight into how different companies and industries meet business ethics challenges. This experience and data underpin the methodologies we have developed to support our clients in implementing the highest management standards.