

Child Protection Procedure

1. Fundamental principles

1.1 Every child labour case is different and the response should be tailored as appropriate to the individual circumstances. A child-centred approach will be adopted which aims to ensure all interventions are in the best interests of the child and their family whilst also ensuring the child's opinions are taken into consideration and their privacy is protected.

1.2 Costs associated with child labour remediation should be shared between all relevant business partners. However, in the absence of an agreement, Pets at Home will pick up immediate costs to prevent any delay in taking necessary safeguarding action. We will actively seek to recoup a share of these costs from all implicated sourcing partners in line with our supplier terms and conditions.

1.3 Definitions

Child	The International Labour Organization (ILO) Worst Forms of Child Labour Convention (No. 182) defines a child as all persons under the age of 18
Child labour	ILO defines child labour as work that deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development. Child labour refers to one or more of the following: 1) Work done by a child who is under the minimum age of admission to employment for the type of work concerned; 2) Work that interferes with compulsory education; 3) Work that is likely to jeopardize a child's health, safety or morals, known as hazardous work; 4) Other "worst forms of child labour" besides hazardous work.
Young Worker	A person who has reached the minimum legal working age, usually 15 (or higher if stipulated by national law), but is under 18 years old (still a child).

2. Investigating young looking workers

2.1 Review systems in place to verify workers age to ensure these are adequate. For any workers you suspect are underage, review identification documents, checking identity, age and whether the documents appear genuine.

2.2 If age verification checks are inconclusive, assume workers are underage until verified otherwise. Verification may require contact with parents and/or local labour authorities.

2.3 If underage workers are identified or suspected, review records for 100% of the site worker population to ensure no further child workers are present.

3. Escalation

3.1 Suspected or verified child labour should be reported immediately to regional ethical leads who will take responsibility for managing the business response:

UK Office - Responsible Sourcing Specialist or designated cover.

Tel: +44 (0)7584 061597

HK Office - Quality & Packaging Manager or designated cover.

Tel: +852-93811758

4. Immediate safeguarding

4.1 Any child found working should be immediately removed from work and relocated to a safe place.

4.2 Care should be taken to sensitively obtain information about the child's current circumstances by completing the attached form. Clearly explain to the child what is happening, why and what the potential next steps are to support them. The child should be reassured that they will be protected. Children should be spoken to in the presence of at least 2 adults (neither of which should be linked to factory management and where possible female, especially when talking to female children). Confidentiality must be maintained for the child and their family.

4.3 The child and parent/guardian's home address and mobile numbers should be obtained. The child should be provided with a suitable emergency contact number.

4.4 The child's wishes and concerns should be taken into account when determining immediate safeguarding arrangements and also agreed with their parent/guardian. Where the child cannot safely be returned home and is living in business-provided accommodation, free food and accommodation must be provided. Accommodation arrangements should be reviewed and any appropriate steps taken to ensure a safe environment is provided until permanent arrangements can be put in place.

4.5 Where the child's safety cannot be assured, an NGO (UNICEF or other suitable local organisation), local ILO office, or local child protection services shall be engaged to help provide suitable emergency care. Local government authorities should be engaged with extreme caution bearing in mind the maturity of local support services and whether the government takes a punitive approach to child labour.

4.6 Arrangements for an interim weekly/monthly support payment plan should be put in place. Payments should be equivalent to the child's current weekly/monthly income or meet at least the local minimum wage if this is higher.

4.7 All interim arrangements should be discussed with senior factory management where appropriate.

5. Remediation Support

5.1 Specialist support should be engaged as soon as possible and deployed onsite within 72 hours to:

- a) Verify that immediate safeguarding arrangements are adequate.
- b) Arrange a suitable health assessment (if appropriate)
- c) Consult with the child and their family to discuss and agree options for remediation or assign an appropriate 3rd party to do so.
- d) Liaise with all business partners to agree remediation plan and costs.
- e) Make arrangements with educational/vocational training providers.
- f) Independently monitor remediation arrangements including the payment of educational costs and weekly/monthly allowances.
- g) Conduct any additional training in child rights and child worker policies for the factory.

5.2 The following providers are approved by Pets at Home Responsible Sourcing Team for immediate engagement:

Priority to contact	Organisation	Contact
1	The Centre for Child Rights and Business Bangladesh, Cambodia, China, Egypt, India, Laos, Myanmar, Turkey and Vietnam	Hong Kong Office: info@childrights-business.org Beijing Office: +86 10 8440 0021
2	Impactt Limited	UK Office: +44 (0) 207 242 6777 info@impactlimited.com

6. Child in the factory but not working

6.1 Move the child to a safe place.

6.2 Meet with parents/guardian and carefully explain why it is unsafe for children to be in the factory. Seek to understand current childcare/schooling arrangements.

6.3 If no suitable childcare/schooling arrangements exist, work with the factory to identify local services and explore how the factory could support parents with their childcare responsibilities.

6.4 Review rules relating to children onsite with the factory management and ensure these are clearly explained to workers

7. Young Workers in hazardous environments

7.1 Ensure the young worker is re-allocated to a low risk role with no detriment to pay.

7.2 Arrange for a full health check to be conducted as soon as possible.

7.3 Ensure all legal restrictions imposed on children and young workers are met (including employment permits, parental agreements, restrictions on working hours and break entitlements)

7.4 Ensure arrangements for safeguarding are appropriate including whilst staying in business-provided accommodation (if applicable)

7.5 Review and address any training needs for young workers and the supervisors/managers responsible for them.

8. Investigation

8.1 Conduct an investigation into the circumstances surrounding the employment of underage workers and ensure learnings are acted upon.

CHILD LABOUR NOTIFICATION FORM

Date & time of notification	
Factory name	
Factory address	
Factory contact name	
Factory contact email and phone number	
Supplier/vendor name	
Supplier/vendor contact email and phone number	
Number of cases identified	
Immediate actions/steps taken by the factory (Take photographs where appropriate)	
Any other relevant information	
Name of the child:	
ID number & copy as attachment (if any):	
Date of birth	
Start date at the factory/site	
Salary	
Work position	
Current situation and location of the child	
Hometown or area of social registration	
Phone number	
Other means to keep in touch	
Family status including primary caretaker and location of parents	
Parents (legal guardian) name and contact number	
Main reasons why child was in employment	
Engaged in hazardous work?	

Duplicate for more than 1 child

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