



THE VERY GROUP

The Very Group Young Worker, Child Labour and Prevention of Children Entering Production Sites Policy

Purpose:

Child labour is a complex and growing problem across global supply chains it can occur anywhere, in developed and developing economies alike and the nature of the problem and the context will always vary.

This Policy is intended to help all The Very Group suppliers and factories understand the steps they need to take to protect young workers in their supply chain and to ensure compliance with the United Nations International Labour Organisation's Conventions relating to child labour.

Definition:

Young worker: Any person between the legally defined child labour age in your country and 18 who is employed in the workforce. These workers can only undertake non-hazardous employment and the correct safeguards must be in place to protect their health and development

Child labour: Any work carried out by someone below the legally defined child labour age in the country in which you operate, that deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development.

Our Requirements:

The Very Group do not permit children to be involved in the manufacture or supply of goods to us as this often means they are deprived of their rights to a childhood and education and are at risk of endangering their physical, mental and social well-being. Employing young workers within our supply chain is encouraged, provided that adequate precautions are put in place for their protection.

We expect all our suppliers to monitor their own supply chains with regards to child labour and young workers and to contact us immediately if they have any concerns regarding this. In return, if instances of child labour are identified, The Very Group commit to supporting and working with suppliers to develop responsible solutions that are in the best interests of these children and where possible encourage children back into education.

Protecting Young Workers:

Young workers must not be employed at night, work overtime or carry out any form of hazardous work which includes not working in or near areas where chemicals are used.



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The Very Group encourages the use of work-based training programs that enable young workers to learn new skills. These programs should be aimed at developing young workers' skills and experience and workers engaging in these programs must be paid at least minimum wage for every hour worked including any training time.

Supplier and factory responsibilities:

- Factories must have effective systems in place to check the ages of all workers used on site. Factory management must check and hold copies of official documentation that verify the date of birth for every worker. This documentation must show that the worker is legally old enough to work or meets with The Very Groups minimum age requirements.
- Factories must provide training to recruitment/human resources staff to ensure they have a full understanding of how to check the validity of documentation (i.e. in date and genuine) and ensure it belongs to the worker in front of them.
- If official date of birth documents are not available (because the Government does not issue such documents) the worker's age must be established using other appropriate and reliable methods.
- Full compliance with local law restrictions relating to young workers must be guaranteed.
- Specific young worker risk assessments to identify any hazardous work or conditions and put systems in place to ensure young workers are protected.
- Ensure young workers are not engaged in night work, hazardous work or physically demanding work.
- Do not allow children in production areas under any circumstances.

Preventing Children from entering the workforce:

Children must not be permitted in production areas at any time. This includes the children of workers who live in factory provided accommodation and children brought to care facilities on site.

The factory must ensure that:

1. Children cannot enter production areas.
2. All workers and auxiliary workers e.g. security guards, cleaners understand that children cannot enter production areas under any circumstance.
3. Provide safe and adequate supervision of children living in factory provided accommodation.
4. Provide safe and adequate supervision of children brought to the factory whilst their parents/guardians work
5. All entrances to sites are monitored and that security personnel are trained and understand the provisions relating to children within the factory compound.
6. Clear procedures are in place for checking and recording the age of visitors to the factory.

Factories with children living in factory provided accommodation must:

- Ensure children have proper adult supervision during work time from a parent, guardian or nominated and approved adult
- Have a registered guardian(s) who have the right to collect children and take them off the production site – security personnel should retain secure copies of guardians' photo identification at site entrances/exits



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- Ensure accommodation provided and its facilities is safe for children e.g. railings on staircases
- Keep a register of all children living on site, next of kin and other key contacts
- Provide appropriate play areas separate to the production area

Factories with children being cared for at on-site facilities e.g. crèches must:

- Ensure children of school attending age attend school. They can stay in on-site facilities after school hours and during school holidays
- Have a parent and/or guardian's written consent to place children the in facility
- Be accompanied by a trained care giver, their parent or guardian from site gates to child-permitted areas
- Employ carers who can demonstrate sound child care experience and have no criminal history
- Employ sufficient numbers of carers for the number of children
- Provide training to carers on child care and site policies and procedures
- Permit parents/guardians to visit their children during breaks
- Ensure children are collected by their registered parent/guardian within a reasonable time period
- Ensure children are never left without a carer
- Ensure the crèche facility is separate to any production area/building
- Facility is structurally safe and fit for purpose e.g. has clean running water for drinking and bathing, resting areas, toys, activities, proper ventilation and means for temperature control
- Provide food and drink for children

Supplier responsibilities if a child is found on site:

If a child is found at a production site, the supplier should follow the below procedure:

- Immediately take the child away from the production area, to a safe place
- Check that the child is safe and has not been harmed
- Contact the parent/guardian to collect the child
- Arrange for a trained care giver to stay with the child until the parent/guardian arrives
- Investigate the situation to understand how and why the child was permitted to enter the production area
- Identify improvements that can be made to management systems in order to prevent children from entering production sites, and communicate these improvements to The Very Group
- Implement management system improvements and closely monitor that procedures are being followed

Child Labour Remediation:

Children must not be involved in any part of The Very Groups supply chain. However, if child labour is found, we commit to continuing our business relationship with the supplier and



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providing them with support as long as they are willing to work together to develop responsible solutions that are in the best interests of the children.

If a supplier fails to implement suitable remediation efforts then The Very Group reserve the right to exit.

The first step if child labour is suspected is to clarify the true identity and age of the child in question. This can be done by reviewing age documents of the child and verifying that they are genuine.

If document checks confirm the child is underage or if they are inconclusive the following actions should be taken:

- Remove the child from all work immediately. Preventing work from continuing gives a clear message.
- Ensure the child is in a safe place.
- Obtain contact details (preferably with a phone number) of the child's parent or guardian.
- If the documentary evidence is inconclusive checking the age of the child may entail:
 - Communicating or meeting with the children's parents or guardians
 - Contacting local labour authorities to validate identification
- Once age has been verified it is important to sit down and talk to the child to understand exactly what is going on and why. During this you should make the child as comfortable as possible and ensure that you truly understand what they are saying to you.

The Remediation Process:

Ensuring the child's welfare must be the first priority for any remediation programme. It is vital that the people involved in this process understand the specific needs, circumstances and aspirations of both the child and their family and the drivers which pushed the child into work in the first place. The remediation plan needs to ensure that these drivers are tackled so that the risk of the child being pushed back into work is reduced.

Key Stages:

- Identify a remediation team; this should be made up of representatives from the factory, the customer, the trade union or worker committee and if possible local experts from NGO's or the government.
- Evaluate whether an adult family member could be employed by the factory in place of the child. This would ensure the family's income is maintained and also continues the link between the factory and the family, which would increase the chances of the remediation programme working.
- Identify a suitable school or tutoring facility. This should match the needs and circumstances of each child. As well as basic literacy the education should ideally



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involve learning skills which will be useful in gaining good employment as an adult. If a child has migrated for work it is necessary to look for schooling both in their home town and also in the area near the factory.

- Appropriate accommodation must be found for the child. This must be safe and secure and have adult supervision. For children who are away from home the best interim solution may be for them to remain in the factory dormitory for the short term. Long term accommodation must be found though and must be away from the factory premises.
- Agreement of who is going to pay the remediation costs needs to be agreed, this includes education costs, travel expenses and an ongoing payment which is equivalent to the wages being earned by the child. This should continue until the child reaches the national minimum working age.
- There needs to be agreement of who is going to be responsible for monitoring the ongoing programme, this will be looked at further below.
- There should be a commitment from the supplier to re-hire the child when they reach the legal working age if the child wishes this to be the case.
- The child's parents should be consulted at every stage of this process to ensure they fully support and understand the programme.
- The last thing to do is obtain signatures from all parties involved in the remediation setting out the elements of each child's programme (including schools, payments etc) and the duties of each party to ensure success of the remediation.

Ongoing support and monitoring:

All remediation programmes need ongoing monitoring to ensure that at all stages it continues to benefit the child involved. This should be carried out by either the purchasing company, a local NGO or trade union or a local expert, under no circumstances should this be carried out by the factory.

Monitoring should include the following:

- Monitoring of the child's progress at school, via exam results, school reports and discussion with teachers.
- Home visits by someone independent who knows the child to discuss their hopes, fears, progress and ambitions.
- Ensuring ongoing regular payment of a stipend, school fees and any other agreed expenses.

Any findings from the monitoring should then be used to alter the remediation programme if it is not working successfully.

Potential risks of working with children:

It is necessary for all those who are working on remediation programmes to be aware of situations which may present risks and to ensure that these are managed effectively:



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- Ensure that the interview with the child is in a room with windows and is a safe place for both you and the child. When the interview takes place ideally a witness should be present. They are there only to observe and must not ask questions.
- As far as it is possible always ensure you are working with the child in a place visible by others. In general it is inappropriate to:
 - Spend excessive time alone with the child
 - Take the child to your home
- You should ensure a culture of openness exists between all members of the team and the child to ensure that any issues or concerns can be raised and discussed.
- Try to guarantee that a sense of accountability exists between all the adults working with the child so that poor practice does not go unnoticed or unchallenged.
- Try to empower the child – if you discuss with them their rights, what is acceptable and unacceptable and what they can do if they think there is a problem then they are more likely to open up.

The Very Group Responsibilities:

The Very Group commit to working in partnership with the supplier and appropriate local organisations to develop a suitable remediation plan that is in the best long-term interests of the children, as laid out above.