Child Protection Procedure

1. Commitment

Community Foods commits to The Children's Rights and Business Principles to respect and support children's rights including:

1. Taking steps to seek to eliminate child labour in all our business activities and business relationships.
2. Providing decent work for young workers, parents and caregivers.
3. Ensuring the protection and safety of children in all business activities and facilities.

2. Purpose

We recognise that child labour is prevalent in agricultural supply chains in many of the countries that we source from. In many of these rural communities, child work is not only normalised and culturally acceptable but also seen as economically essential. It is within this context that Community Food's colleagues need be prepared to identify child labour and respond appropriately in the best interests of the child.

3. Scope

The principles outlined in this procedure apply to the business activities of Community Foods and the business relationships linked to our operations, product sourcing and processing. The procedure must be followed by all Community Foods colleagues, and we will provide guidance and training to support its implementation.

4. Definitions

Child	The International Labour Organization's Worst Forms of Child Labour Convention (No. 182) defines a child as all persons under the age of 18
Child Labour	The International Labour Organization 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). A country may have specified the minimum age of 14 years due to insufficiently developed economy and educational facilities.
Adolescent	Individual aged between 10 and 17

Hazardous work	As defined under Article 3 of ILO Recommendation No. 190: (a) work which exposes children to physical, psychological or sexual abuse; (b) work underground, underwater, at dangerous heights or in confined spaces; (c) work with dangerous machinery, equipment and tools, or which involves the manual handling or transport of heavy loads; (d) work in an unhealthy environment which may, for example, expose children to hazardous substances, agents or processes, or to temperatures, noise levels, or vibrations damaging to their health; (e) work under particularly difficult conditions such as work for long hours or during the night or work where the child is unreasonably confined to the premises of the employer.
Light work	Work that is unlikely to harm the health or development of a child, and that does not impact their ability to receive an education. Light work is not considered child labour. Additional elements important to the acceptance of a definition of light work: 1) The work is performed under the direct supervision of an adult 2) The work is less strenuous, performed under normal conditions, including appropriate rest breaks 3) The child receives a 24-hour break per 7 days of work 4) There is no interference with the child's schooling 5) Parental consent or other documentation are collected as required by law 6) Children should not work more than 14 hours a week, and work should not take place before 6:00am or after 8:00pm
ILO Forced labour indicators	1. Abuse of vulnerability 2. Deception 3. Restriction of movement 4. Isolation 5. Physical and sexual violence 6. Intimidation and threats 7. Retention of identity documents 8. Withholding wages 9. Debt bondage 10. Abusive working and living conditions, and 11. Excessive overtime
Family smallholder farm	Small-scale farm which relies on family labour only.
Accompanied children	Children working under the care or supervision of a family-member or legal guardian in the workplace.
Unaccompanied children	Children not working under the care or supervision of a family-member or legal guardian in the workplace.

5. National legal frameworks

In some jurisdictions, children are legally permitted to work at ages below the internationally accepted age or to take on hazardous work. In such cases, we defer to the higher, internationally accepted standards but it is important context to understand the national legal framework which applies. The ILO provides key information by country linked below.

Minimum age for admission to work
Minimum age for light work
Light work - Determination of types and conditions of activities
The minimum age for admission to apprenticeship
The minimum age for hazardous work
List of hazardous activities prohibited for children

6. Key principles

6.1 Sensitive response

Poverty and inequality are key drivers of child labour. Any response must be child-centered, cause no harm, and prioritise the best interests of both the child and their family.

6.2 Individualised support

Each case of child labour is unique. Responses should be tailored to the child's specific circumstances and take into account their views and preferences.

6.3 Privacy and confidentiality

The child's privacy must be protected at all times throughout the investigation and remediation process.

6.4 Shared responsibility and immediate action

Any costs related to child labour remediation should be shared among all relevant business partners. In the absence of a formal agreement, Community Foods will cover immediate costs to prevent delays in safeguarding actions.

6.5 Systemic child labour

Where child labour is identified as a systemic issue within a supply chain, we will actively engage with customers, direct suppliers, NGOs, local communities, and other relevant stakeholders to pursue a collaborative, community-based approach to remediation.

7. Child labour risks in our own operations

Community Foods operates from a production site in Witham, England. Child labour risks are low in the United Kingdom, where education (or some form of vocational training) is mandatory until the age of 18 and universally provided by the state. Community Foods only hires workers directly and indirectly who have reached 18 years of age, with robust identity and age-verification checks completed. Child labour is therefore considered a negligible risk for our own operations. However, if we were to encounter a child working in our business, we would follow the principles outlined in this procedure.

8. Acceptable child work in a family farm context

In many countries, minimum age laws for employment do not apply to children working in their family business. Under Article 5 of the Minimum Age Convention, minimum age requirements are excluded for family run small-scale holdings that produce for local consumption and do not regularly employ hired workers.

In agricultural communities worldwide, it is common for children to work on their family farms. We acknowledge the difficulty of achieving consensus and enforcing a blanket ban on this practice, given how deeply it is embedded in farming life. We also recognise that, in the right context, such work can help children develop valuable skills and contribute to household income. For this reason, we do not classify adolescents assisting with family farm activities as child labour, provided the work is safe, does not interfere with schooling, and they are always supervised by an adult relative.

9. Identifying child labour

The following sections detail recommended actions that Community Foods colleagues should take if they encounter or suspect child labour.

9.1 Age verification systems

Review existing systems used to verify workers' ages to ensure they are robust and effective. For any worker suspected of being underage, carefully examine identification documents to confirm identity, age, and document authenticity (where possible).

9.2 Handling unverified or undocumented workers

If age verification is inconclusive or workers lack documentation, assume they may be underage until confirmed otherwise. Verification may require contact with parents or guardians. Approach children sensitively when asking them their age and be aware of cultural norms on calculating age e.g. in China a person is considered one year old at birth and gains an additional year on the Lunar New Year (Spring Festival).

9.3 Site-wide review

If any underage workers are identified or suspected, conduct a full review of records for 100% of the site's workforce to ensure no additional child workers are present.

10. Safeguarding for unaccompanied children

Children who are not in the care or supervision of an adult family member or guardian must be considered vulnerable, and every possible measure should be taken to ensure their safety.

10.1 Immediate removal and safety

Any child who is found working must be promptly removed from the workplace and relocated to a safe environment.

10.2 Sensitive information gathering

Information about the child's current situation should be gathered with care using the attached form in Section 18. Clearly explain to the child what is happening, why it is happening, and what the next steps will be to support them. Reassure the child that they are safe and will be protected. Conversations should take place in the presence of at least two adults, neither of whom should be affiliated with factory management. Where possible, include a female adult, especially when speaking with female children. Confidentiality must be maintained for both the child and their family.

10.3 Contact details and emergency support

Obtain the child's and their parent/guardian's home address and mobile contact numbers. Provide the child with an appropriate emergency contact number.

10.4 Safeguarding and accommodation

The child's views and concerns must be considered when determining immediate safeguarding arrangements, in consultation with their parent or guardian. If the child cannot safely return home and is residing in business-provided accommodation, free food and shelter must be provided. Accommodation should be reviewed to ensure it is safe until permanent arrangements are made.

10.5 External support and caution with authorities

If the child's safety cannot be guaranteed, engage a suitable NGO (e.g., UNICEF), local ILO office, or child protection services to arrange emergency care. Exercise caution when involving local government authorities, considering the maturity of local support systems and any punitive approaches to child labour.

10.6 Interim financial support

Establish a temporary weekly or monthly support payment plan. Payments should match the child's previous income or meet the local minimum wage, whichever is higher.

10.7 Coordination with factory management

All interim safeguarding and support arrangements should be discussed with senior factory management, where appropriate.

11. Accompanied underage child workers

Underage children who are working under the direct supervision of an adult family member or guardian on a family-run farm or a worker-group may be less vulnerable, but it is important to sensitively explore the nature of their involvement, including:

1. Checking the child's age.
2. Checking if the child is in school and if not, the reason why.
3. What type of work is being carried out.
4. What tasks, if any, the child is not permitted to carry out.
5. The typical hours of work per day and per week.
6. Whether the work is paid or considered subsistence/family-support.

Underage children should be asked to stop working whilst the above information is escalated in line with section 14.

If children are found to be working in a hazardous environment, the relevant requirements in section 12 should be followed.

12. Young workers in a hazardous environment

12.1 Role Reallocation

Ensure the young worker is reassigned to a low-risk role without any reduction in pay.

12.2 Health Assessment

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

12.3 Legal Compliance

Ensure full compliance with all legal requirements related to the employment of children and young workers, including:

- Employment permits
- Parental/guardian consent
- Restrictions on working hours
- Entitlements to breaks and rest periods

12.4 Safeguarding Measures

Review and confirm that safeguarding arrangements are appropriate, including those related to business-provided accommodation, if applicable.

12.5 Training and Support

Identify and address any training needs for the young worker, as well as for their supervisors and managers, to ensure safe and supportive working conditions.

13. Child in the workplace but not working

13.1 Immediate safeguarding

Relocate the child to a safe and secure environment without delay.

13.2 Family engagement

Meet with the child's parent or guardian to explain why the workplace is unsafe for children. Seek to understand the current childcare and schooling arrangements in place.

13.3 Support for Childcare and education

If suitable childcare or schooling options are not available, collaborate with the employer to identify local services and explore ways the employer can support parents with childcare responsibilities.

13.4 Policy review and communication

Review the company policies regarding children on-site with management, and ensure these rules are clearly communicated to all workers.

14. Escalation

Suspected or verified child labour should be reported immediately to the Ethical Lead (or their designated cover) who will take responsibility for managing the business response and longer-term action plan.

15. Remediation Support

15.1 Deployment of specialist support

Where appropriate, specialist support should be engaged promptly and deployed on-site within 72 hours to:

a) **Verify Safeguarding** – Assess and confirm that immediate safeguarding arrangements are appropriate and effective.
b) **Health Assessment** – Arrange a suitable health evaluation for the child, if deemed necessary.
c) **Family Consultation** – Engage with the child and their family to discuss and agree on remediation options or assign a qualified third party to facilitate this process.
d) **Business Partner Coordination** – Liaise with all relevant business partners to agree on a remediation plan and associated costs.
e) **Education and Training** – Coordinate with educational or vocational training providers to support the child's development.
f) **Monitoring and Oversight** – Independently monitor the implementation of remediation measures, including the payment of educational expenses and any agreed weekly/monthly allowances.
g) **Capacity Building** – Deliver additional training to factory staff on child rights and child labour policies to strengthen awareness and compliance.

15.2 The following providers are approved for immediate engagement:

a) **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
b) **Impactt Limited UK Office -** +44 (0) 207 242 6777 info@impactlimited.com

16. Investigation

Investigate the circumstances surrounding the employment of underage workers and ensure that all findings are acted upon to prevent recurrence.

17. Accountability and Responsibility

Responsibility for implementing this policy lies with the leadership team of Community Foods, with support from the Ethical team. All colleagues who have a supplier-facing role must understand this procedure, have the information available when they visit suppliers and respond appropriately if they encounter children whilst on supplier visits.

18. Information Collection Form

Date & time of notification	
Site business name	
Site address	
Site contact name	
Site contact email and phone number	
Supplier/vendor name	
Supplier 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 with employer	
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 - include primary caregiver and location of parents	
Parents/legal guardian name and contact number	
Main reasons why child was in employment	
Engaged in hazardous work?	
Confirm the child is not in a forced labour situation	
Person completing this form	

19. Review

This procedure will be reviewed annually and updated as necessary to reflect changes in law, best practice, and stakeholder expectations. We will monitor compliance and report on progress annually through our published Human Rights and Modern Slavery Statement.

Document Control	
Document Title:	Community Foods Child Protection Procedure E03V2
Date Issued:	10 November 2026
Prepared by:	Ethical Lead
Authorised by:	ESG Steering Committee
Published location:	https://www.communityfoods.co.uk/about/our-policies.
Review date:	10 November 2027

Version Control			
Document Version:	Date:	Comments/Description of Changes:	Changed/Reviewed by:
E03V1	21 October 2025	Original creation	Dawn Rusling (Ethical Manager)
E03V2	10 November 2026	Format changes and version control added	Gillian Darbyshire (Ethical Lead)