



# Child Remediation Policy

**Doc No:** EPOL 019 **Title:** Child Remediation Policy

**Issue Date:** 21/11/2025 **Issue:** 1

**Author:** Jim Higgins

**Authorised:** Robert Fenton

**Applies to:** All employees, contractors, suppliers, subcontractors, and labour agencies

**Jurisdiction:** United Kingdom

**Aligned with:**

- Children and Young Persons Act 1933
- Education Act 1996
- Employment of Women, Young Persons, and Children Act 1920
- Working Time Regulations 1998 (as related to young workers)
- Modern Slavery Act 2015
- ILO Conventions 138 & 182
- UN Guiding Principles on Business and Human Rights (UNGPs)

## 1. Purpose

This policy sets out the steps to be taken if a child (a person below the minimum legal working age) is found working within our operations or supply chain.

Its purpose is to:

- Protect the welfare, safety, and best interests of the child.
- Ensure compliance with UK legislation and international labour standards.
- Prevent recurrence of child labour through corrective and preventive actions.

## 2. Scope

This policy applies to:

- All employees within the organisation
- Temporary and agency workers
- Contractors, subcontractors, and labour agencies
- All suppliers involved in manufacturing, distribution, or service provision

## 3. Legal Definitions (UK Context)

**Child**

A person **under the age of 16** who is required to be in full-time education under the **Education Act 1996**.



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## Young Worker

A person aged **16 or 17** who is above the minimum school leaving age but under 18.

### Minimum Working Ages (UK)

- **Under 13:** Cannot work.
- **13–15:** Restricted “light work” only; strict hours and activity limitations.
- **16–17:** Can work but with strict protections (working time limits, no hazardous work).
- **Hazardous or manufacturing environments:**  
*Children under 18 may not be employed in hazardous, industrial, or manufacturing roles unless part of approved training under supervision.*

## 4. Policy Statement

The company strictly prohibits the use of child labour. When child labour is identified, our response prioritises the **child’s safety, education, and long-term wellbeing**.

Children will **never be penalised**, and any remediation support will be provided without financial or legal burden to them or their family.

## 5. Identification and Verification

### 5.1 Identification

Child labour may be identified through:

- Age-verification checks
- Site audits
- Supplier visits
- Employee reporting
- Concerns raised by third parties or authorities

### 5.2 Verification

Where age concerns exist, the company will request verification through:



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- Passport
- Birth certificate
- Government-issued documents
- School records
- Other legally recognised documents

## 6. Immediate Response Steps

If a suspected child labour case is identified:

1. **Remove the child from work immediately**, ensuring no harm or discrimination.
2. **Conduct a safety assessment** to confirm the child is not at risk.
3. **Notify the Compliance Manager or HR Lead** within 24 hours.
4. **Record the incident** in the Child Labour Case Log.
5. **Suspend use of the labour supplier** (if relevant) pending investigation.

No disciplinary action will be taken against the child.

## 7. Family Engagement and Welfare Assessment

Within 48 hours of identification:

- Meet with the child and family/guardian in a **supportive and confidential** manner.
- Assess:
  - Living conditions
  - Financial situation
  - School attendance and education status
  - Reasons for entering employment
- Determine whether social services or external child-protection agencies need to be involved (in alignment with UK safeguarding requirements).

## 8. Remediation Plan

A tailored remediation plan will be developed for each case, which may include:



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## 8.1 Education Reintegration

- Support to re-enrol the child in school.
- Payment of school-related costs (uniforms, transport, meals, materials).
- Coordination with local education authorities if necessary.

## 8.2 Financial Support for the Family (If Appropriate)

To prevent economic pressure causing re-employment of the child:

- Temporary income support
- Compensation equivalent to lost wages (time-limited)
- Referral to government welfare support where relevant

## 8.3 Health & Wellbeing Support

- Medical assessment if the child performed hazardous tasks
- Access to counselling or psychosocial services if needed

## 8.4 Safe Transition for Young Workers (16–17)

If the individual is above the minimum school-leaving age but under 18:

- They may only return to work **after a risk assessment** and **confirmation of legal compliance** for young workers.
- Hazardous tasks are strictly prohibited.

All actions will be documented in a Remediation Case File.

# 9. Preventive Actions

Following any confirmed case:

- Conduct root-cause analysis.
- Strengthen age-verification procedures.
- Retrain supervisors, HR, and recruiters.
- Review supplier compliance.
- Amend contracts with labour agencies or suppliers as needed.
- Increase frequency of audits for high-risk suppliers.



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## 10. Roles and Responsibilities

### Management

- Ensure enforcement of this policy
- Approve remediation plans
- Maintain compliance with UK law

### HR / Compliance Team

- Lead investigations
- Conduct family engagement
- Oversee documentation

### Supervisors

- Report suspicions immediately
- Prevent unauthorised employment of minors

### Suppliers and Contractors

- Must comply with this policy as a contractual requirement

## 11. Monitoring and Follow-Up

- Monthly checks for 6–12 months to ensure the child remains in education
- Quarterly supplier audits
- Annual risk assessments of supply chain labour practices

Failure of a supplier to cooperate may result in:

- Contract termination
- Suspension
- Mandatory corrective action programmes



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## 12. Confidentiality

All information relating to the child and family will be treated as confidential and shared only with authorised personnel or relevant safeguarding bodies.

## 13. Review of Policy

This policy will be reviewed annually or following any child labour case, legal change, or audit requirement.

**Robert Fenton**  
**Group Managing Director**