



HUMAN RIGHTS IN TOURISM

An Implementation Guideline for Tour Operators

This guideline is
presented by




www.humanrights-in-tourism.net
info@humanrights-in-tourism.net

Imprint

Concept and content development	Christian Baumgartner, Heinz Fuchs, Angela Giraldo, Ruth Hopfer-Kubsch, Günter Koschwitz, Jesco Kreft, Peter-Mario Kubsch, Ilyta LaCombe, Matthias Leisinger, Antje Monshausen, Christine Plüss, Gwendolyn Remmert, Johannes Reißland, Nina Sahdeva, Miriam Schaper, Christiane Staffhorst, Petra Thomas, Andreas Zotz
Editing	Andreas Zotz (Naturefriends International)
Consultancy	Christopher Schuller, Deniz Utlu (German Institute for Human Rights), Sören Stöber (ABTA – The Travel Association)
Copyediting	Cornelia Kühhas
Graphic design	Hilde Matouschek www.officina.at
Picture credits	Hermann Erber / www.outdoor-foto.at (cover picture), Maria Estella Dürnecker / NFI Fotomchampionship 2012 (S. 4), Franck Guiziou / hemis / laif (S. 5), Tourism Concern (S. 6), jikphoto.ch (S. 7), Claus Mikosch / Dreamstime (S. 10), Hilde Matouschek (S. 11), Eric Gevaert / fotolia (S. 17), imageteam / fotolia (S. 18), Naturefriends International (S. 20), Kuoni Travel Holding Ltd. (S. 28), Studiosus Reisen München GmbH (S. 30)
Published in	October 2013
© Editors	arbeitskreis tourismus & entwicklung (Working Group on Tourism and Development) Missionsstraße 21, CH-4003 Basel, Tel.: +41 (0)61 261 47 42, E-Mail: info@akte.ch Bread for the World – Protestant Development Service (Protestant Agency for Diakonia and Development) Caroline-Michaelis-Straße 1, D-10115 Berlin, Tel.: +49 (0)30 652 11 1807, E-Mail: tourism-watch@brot-fuer-die-welt.de kate ecology and development, Blumenstraße 19, D-70182 Stuttgart Tel.: +49 (0)711 248 397 0, E-Mail: info@kate-stuttgart.org Naturefriends International – NFI Diefenbachgasse 36/9, A-1150 Wien, Tel.: +43 (0)1 892 38 77, E-Mail: office@nf-int.org
In cooperation with	a&e erlebnis:reisen – ae abenteuer & exotik Begegnungsreisen GmbH (Hamburg) Global Compact Network Germany (Berlin) forum anders reisen e. V. (Freiburg) Gebeco GmbH & Co KG (Kiel) Hamburg Foundation for Business Ethics Hauser Exkursionen international GmbH (München) Kuoni Travel Ltd. (Zürich) ONE WORLD Reisen mit Sinnen – Pardon / Heider OHG (Dortmund) Studiosus Reisen München GmbH TourCert GbR (Stuttgart) viventura GmbH (Berlin)

CONTENT

Why this guideline? Human rights matter – also in tourism	4
Significance in tourism What has the work of a tour operator to do with human rights?	6
UN Guiding Principles on Business and Human Rights Why are they important for my business?	10
Overview of instruments How can I read this guideline and implement it in my business?	12
STRATEGY Developing a corporate human rights policy	14
SURVEY Assessing the impacts of business activities on human rights	16
INTEGRATION Integrating human rights into business culture and management	20
REMEDY Facilitate grievances and improve the situation of the affected	24
REPORTING Conduct progress review and report publicly	26
Putting implementation into practice How have tourism businesses proceeded?	28
Further Reading  Practical tools and further information	32
Roundtable Human Rights in Tourism Presentation of Members	34



Why this guideline?

Human rights matter – also in tourism

Whether due to the awareness of clients, investors or critical media-businesses are increasingly confronted with the question of how they can respect human rights when carrying out their business activities. Human rights issues are not only significant in the international political arena and for public awareness, but are also becoming increasingly important in corporate governance / business management.

For many businesses in the tourist industry, it no longer matters whether but rather how they address their human rights responsibility. Obvious incentives such as motivated staff, fair business relations, and respect for the local population are indispensable for the creation of quality tourism products. Tourism that aggravates the competition for scarce resources – such as water, food, and land –, that creates exploitive labour conditions, or ignores the needs of the local population will

not remain profitable for long. For destinations that are prone to corruption, or that lack official regulation, conformity with internationally agreed legal standards is an essential prerequisite for lasting and successful business activities.

Since tour operators depend on a variety of service providers for their tourism products – for example, for transport, tour guides, accommodation or catering – it is not always easy for them to assess the full impact of their business activities. Moreover, they are active in many different places where the legal prerequisites, local culture, and ecological standards vary significantly.

Human rights are as much an issue for overseas travel as ...





... for domestic tourism services.

Framework for active and diligent engagement

In June 2011, the United Nations Human Rights Council unanimously endorsed the *Guiding Principles on Business and Human Rights*. These provide the internationally agreed reference framework for economy, justice, politics and civil society, specifying corporate responsibility to respect human rights wherever businesses operate in the world.

Accordingly, businesses must prevent their activities from adversely affecting human rights, and provide remedy in case of abuse. This responsibility refers not only to their own acts (and failures to act), but also to their immediate impact on human rights with respect to business operations, goods and services – even if they themselves have not contributed to this impact. According to the *Guiding Principles*, this means, that companies should act with human rights due diligence in all of their business activities.

In short: respecting human rights is not a passive responsibility. It must be systematically integrated into all corporate processes, including business management. This applies to the tourism sector as well.

Integration into already existing sustainability systems

This guideline is based on the *Guiding Principles on Business and Human Rights* and was specifically devised by the members of the *Roundtable Human Rights in Tourism* to address the needs of tour operators. It supports the development of a human rights strategy that can be integrated into already existing management structures of the tourism industry, and individually adapted to their size and business activities – to specify social needs and to root human rights issues deeply within the organisation.

The tools presented here increase the efficiency of existing sustainability management programmes as business activities, for instance, are more strongly based on international legal standards. Recognised as a right, the social dimensions of sustainability are thus essentially strengthened.

The guideline encourages those businesses that have so far failed to practice sustainability, Corporate Social Responsibility (CSR), or environmental management, to make a first big step towards sustainable entrepreneurship. The guideline offers a simple, but systematic way forward.

Significance in tourism

What has the work of a tour operator to do with human rights?

A tour operator is confronted with human rights in a myriad of ways. Critical human rights issues come up in daily business, in communication with the clients, as well as in business relations. The aim of any tour operator must be to respect human rights and promote their implementation within the scope of their individual options. It is important therefore that a tourism business is familiar with the connections of their own economic activities and supply chains with various aspects of human rights.

The brief examples presented in the following are meant to give an idea of situations in the tourism industry that may lead to the risk of impacting human rights. The range of situations that call for a tour operator to take action is quite substantial. These may include critical situations that tour operators have long been familiar with, but which so far have not been identified as human rights issues, such as the commercial sexual exploitation of children.



Exploited

The crew aboard a cruise ship of a renowned European shipping company works in precarious conditions. The majority of the crew members are recruited from low-wage countries since Western or Central European staff are almost impossible to find for this kind of work, especially in service areas such as hotels, restaurants, cleaning and engine room work. The less qualified the job, the poorer the payment and lodgings. A seven-day-week with 18 hour-plus shifts are the rule.

- ☞ What are the labour conditions in our cruise deals?
- ☞ What are the labour conditions in my company?

One of the human rights contravened here is:

- **The right to work with dignity**
Universal Declaration of Human Rights, Article 23 (1), (2), (3) & Article 24:
“Everyone has the right to work, to free choice of employment, to just and favourable conditions of work and to protection against unemployment; [...] the right to equal pay for equal work; [...] the right to just and favourable remuneration ensuring; [...] the right to rest and leisure, including reasonable limitation of working hours and periodic holidays with pay.”

Obtrusive

In an African region popular for its safari tourism lives a population group famous for its wattle and daub dwellings. Their villages have turned into a tourist attraction. The locals are forced to erect barbed wire fences in order to protect their privacy against the tourist intrusion.

- ☞ Visiting the village is also part of our excursion programme – what should we do?
- ☞ Our customers are seeking cultural exchange even with people living in their traditional ways. How can we develop fair options for that?

One human right contravened here is:

- **The right to privacy**
Universal Declaration of Human Rights, Article 12:
„No one shall be subjected to arbitrary interference with his privacy, family, home [...]“

Discriminated

The owner of a restaurant in the historic center of a Middle European town has advertised for a waitress or waiter. She does not hire the best qualified applicant, who belongs to an ethnic minority, because in the past, visitors have complained about staff from this ethnic group.

- ☞ Shall we continue to include this restaurant in our excursion programme?
- ☞ Could the same thing happen in our own recruitment process?

One human right affected here is:

- **Protection against discrimination**

Universal Declaration of Human Rights, Article 1:

"All human beings are born free and equal in dignity and rights."

Water grabbing

A resort with golf courses is built in a Central American country. The water required for this operation comes from a reservoir that also supplies a neighbouring village. The resort uses so much water that the local population can no longer sufficiently irrigate their fields or satisfy their own needs for food and drinking water. The village community had not been consulted or involved in the hotel planning project.

- ☞ We promote the hotel as an exclusive resort – what now?

Human rights affected here include:

- **The right to an adequate standard of living, including food, water and housing**

Universal Declaration of Human Rights, Article 25 (1):

"Everyone has the right to a standard of living adequate for the health and well-being of himself and of his family, including food, clothing, housing and medical care and necessary social services[...]."

Declaration on the Right to Development, Article 2 (3):

States have the right and the duty to formulate appropriate national development policies that aim at the constant improvement of the well-being of the entire population [...] on the basis of their active, free and meaningful participation in development."

Heavy burdens

Local tour operators at Mount Kilimanjaro use native porters. The porters run a high risk of permanent brain damage since the tours are conducted at brief intervals with insufficient acclimatisation periods. On top of this, tour operators pressure the porters to carry more than the legally allowed maximum load.

- ☞ Are our trekking providers actually making sure that the porters work under fair conditions, without being exposed to health and safety hazards?

Human rights affected here include:

- **The right to health**

Universal Declaration of Human Rights, Article 25 (1):

"Everyone has the right to a standard of living adequate for the health and well-being of himself and of his family."

- **The right to work with dignity**

Under pressure

Some employees of a hotel chain working in the Mediterranean region wanted to start their own trade union. Yet the hotel management refused to acknowledge the trade union, threatening to terminate contracts and pressuring them to join another trade union, favoured by the hotel.

- ☞ The hotel is our business partner – what should we do?
- ☞ What about the unionisation of employees at our business locations?

One of the human rights affected here is:

- **Freedom of Association and Protection of the Right to Organise**

Universal Declaration of Human Rights, Article 23 (4): "Everyone has the right to form and to join trade unions [...]."

Without protection

“Why do you cry? Forget it!” is emblazoned on the t-shirt of the 13-year old waitress in a popular South East Asian entertainment district. In the impoverished rural area, the parents have no other choice but to send their daughter to work in the tourist centre instead of sending her to school. Since then, the girl has been slaving around the clock in the bar, at the mercy of offensive employers and tourists. Her employer frequently forces her to accompany the tourists to their hotel rooms.

- ☞ What do we do to protect children?
- ☞ Do the young staff members in our contract hotels and excursion restaurants really have access to education?

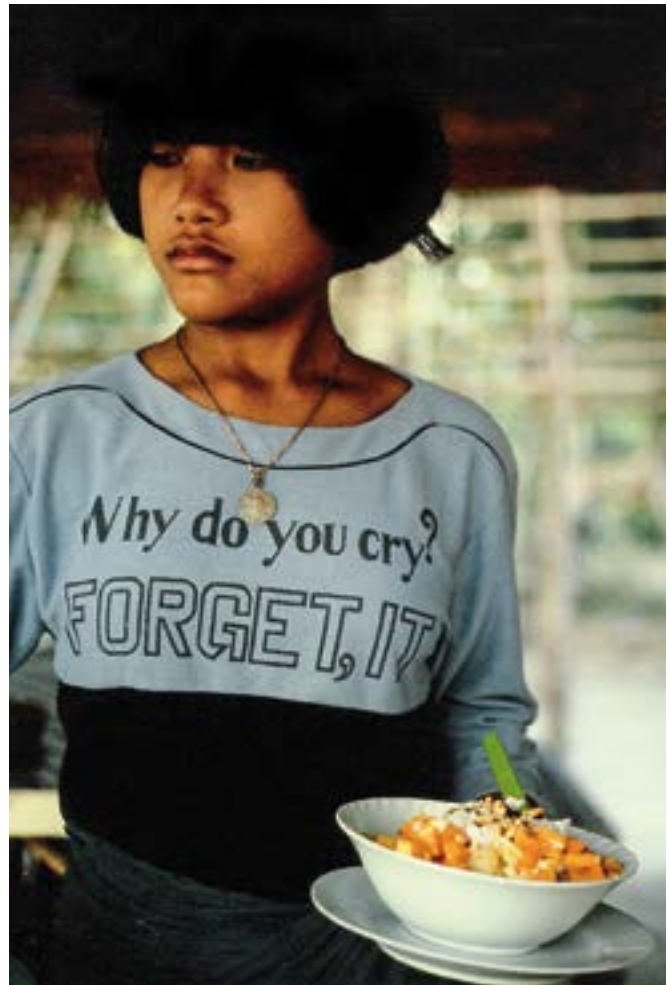
Human rights affected here include:

- **The rights of the child**

Convention on the Rights of the Child, Article 32 (1), 34:
 “States Parties recognize the right of the child to be protected from economic exploitation and from performing any work that is likely to be hazardous or to interfere with the child’s education, or to be harmful to the child’s [...] development. States Parties undertake to protect the child from all forms of sexual exploitation and sexual abuse.”

- **The right to education**

Universal Declaration of Human Rights, Article 26 (1):
 “Everyone has the right to education.”



Under duress

For the construction of a huge resort in the Middle East, cheap manpower is hired from abroad. The employers confiscate the workers’ passports. They are accommodated in squalid dwellings and not allowed to leave the construction site. When they are denied payment of the agreed wages, the employees stop working. Subsequently, they are threatened with prison and left begging for food.

- ☞ We had planned to include the resort as an exclusive novelty in our portfolio – what should we do?

Human rights contravened here include:

- **The Rights of Migrant Workers**

International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families, Article 7:
 “States Parties undertake [...] to respect and to ensure to all migrant workers and members of their families within their territory or subject to their jurisdiction the rights provided for in the present Convention [...]”

- **The right to protection against forced labour**

International Covenant on Civil and Political Rights, Article 8 (3a):
 “No one shall be required to perform forced or compulsory labour.”

- **The right to work with dignity**

- **The right to an adequate standard of living**

Everyone welcome aboard?

A female passenger using a wheelchair was forced to leave the airplane of a popular European low-cost carrier on the grounds that in case of an emergency, she would not be able to use the emergency exit without assistance. The wheelchair user sued the airline for damages and the court subsequently ordered the company to pay compensation to the disabled woman – one of the first judicial decisions in favour of travellers with disabilities.

☞ How effectively are the rights of disabled persons respected on the tours we offer?

Human rights affected here:

- **The Rights of Persons with Disabilities**

Convention on the Rights of Persons with Disabilities, Article 4 (1):

“States Parties undertake to ensure and promote the full realization of all human rights and fundamental freedoms for all persons with disabilities without discrimination of any kind on the basis of disability.”

Ousted

To transform a South American canyon into an accessible tourist attraction, access roads and a hotel complex are built. The project development company claims to own the land, despite failing to submit the necessary documentation. The police forces the local indigenous population from the land.

☞ We just included the resort as an exclusive “Eco Lodge” in our programme – what should we do now?

Human rights affected here are:

- **The Rights of Indigenous Peoples**

*International Covenant on Civil and Political Rights, Article 1/
International Covenant on Economic, Social and Cultural Rights,
Article 1:*

“All peoples have the right of self-determination. By virtue of that right they freely determine their political status and freely pursue their economic, social and cultural development.”

*United Nations Declaration on the Rights of Indigenous Peoples,
Article 10:*

“Indigenous peoples shall not be forcibly removed from their lands or territories. [...]”

Unequal treatment

For several years, a young woman – a graduate from the school of tourism – has been working as a trained travel agent in a German travel agency. When a new male colleague with the same qualification is recruited for her department, she incidentally discovers that his salary is 13 per cent higher than hers. Likewise, he has been promised specific career opportunities for good performance, whereas the employer never mentioned these opportunities to her.

- ☞ Do female employees in our company have the same opportunities and receive the same salaries as their male colleagues?
- ☞ What about the situation in our contract hotels and other business partners

One of the human rights affected here is:

- **Women’s Rights**

Convention on the Elimination of All Forms of Discrimination against Women, Article 2:

“States Parties condemn discrimination against women in all its forms, [...]”

The examples above depict a selection of human rights issues for which conflicts have been documented. These issues should be considered as particularly relevant. Yet this is not an exhaustive overview. Tourism – as any other economic sector – holds the inherent risk to adversely affect all issues concerning human rights

More on the human rights issue in tourism:

☞ **Putting Tourism to Rights.**
A challenge to human rights abuses in the tourism industry
www.tourismconcern.org.uk/putting-tourism-to-rights.html

☞ **Putting Tourism to Rights: A Call for a Human Rights Approach in Tourism** (Short version of the German publication “Alles was Recht ist”).
http://tourism-watch.de/files/eed_tourism_human_rights_shortversion_2011_en_2.pdf

UN Guiding Principles on Business and Human Rights

Why are they important for my business?

In 2011, the United Nations Human Rights Council accepted the *Guiding Principles on Business and Human Rights*. After years of extensive research and consultations, the UN Special Representative on Business and Human Rights, Professor John Ruggie, formulated the duties of states and businesses. With his analytical framework *Protect, Respect and Remedy*, he was able to detail a pragmatic way forward in the yearlong unsuccessful debate on ensuring human rights in the globalised economy.

John Ruggie’s *Guiding Principles* are reflected in frameworks of the European Commission, the *Organisation for Economic Co-operation and Development (OECD)*, the *International Organization for Standardization (ISO)* and the *Global Reporting Initiative (GRI)*. Some states have begun to develop national action plans for the implementation of these principles, and also to increase pressure on businesses. Likewise, committed businesses in various sectors of the economy, including tourism, have initiated a proper implementation process of the *Guiding Principles*.

“Protect, Respect and Remedy” Framework		
State duty to protect	Corporate responsibility to respect	Access to Remedy
States’ international human rights law obligations require that they respect, protect and fulfil human rights. This includes the duty to protect against human rights abuse by third parties through appropriate strategies, regulation and jurisdiction.	Businesses have the responsibility to respect all human rights. Hence, they must act with due diligence and avoid infringing on the rights of others.	Victims of business-related human rights abuse need better access to judicial and non-judicial means that allow them access to effective remedy, such as compensation or punitive sanctions.

Source: Global Compact Network Germany, Twenty Fifty Ltd., German Institute for Human Rights (2013: *Respecting Human Rights – Guidance for Businesses*)



The *UN Guiding Principles on Business and Human Rights* describe the corporate responsibility to respect human rights as follows:

Corporate responsibility to respect means acting with due diligence to avoid infringing on the rights of others, and addressing harms that do occur. This applies across business activities and through relations with suppliers or other business partners. It subsequently demands that the necessary measures are taken to contribute to the protection and implementation of human rights.

The **Access to Remedy** is a duty shared by states and businesses. Hence, appropriate steps must be taken to ensure that when such abuses occur, those affected have access to effective grievance mechanisms and appropriate compensation.



! What consequences arise for me as a tour operator?

- This is not just about the rights of **my customers or my employees**. I am also responsible for the impact of my business activities – including my supply chain – **on other persons**. These include, for instance, the local population at the destination and the employees in my contract hotels or their subcontractors, such as laundries and building companies.
- It is imperative to **identify potential human rights impacts from my corporate actions and decisions** – for example in the creation of tour itineraries, in the selection of Destination Management Companies (DMC) and hotels, or in investments. This is a responsibility for small and large businesses alike.
- I must ensure that this risk assessment is continuously followed and put into practice by every employee in my company. Human rights due diligence must be a **component of my management processes and corporate culture**.
- I am in constant **dialogue with the various stakeholders in my business** and consider their evaluations in my decisions. When I visit my destination areas, for example, I not only speak with local people, but also with the management personnel of my business partners, but also with their employers, local people as well as local NGOs or agencies.
- If I notice adverse effects on human rights, **I will take measures to improve the situation of the people affected** – such as committing the contracted hotels to comply with the Labour Standards of the International Labour Organisation (ILO) and motivating my contract partners to improve the situation of their employees. I will terminate cooperation with those service providers who severely violate human rights, or continue to do so following consultations.

More about the UN Guiding Principles on Business and Human Rights and their significance for businesses:

- 📖 Putting Tourism to Rights: A Call for a Human Rights Approach in Tourism (Short version of the German publication)
- 📖 My Business and Human Rights
- 📖 The Corporate Responsibility to Respect Human Rights – Interpretative Guide

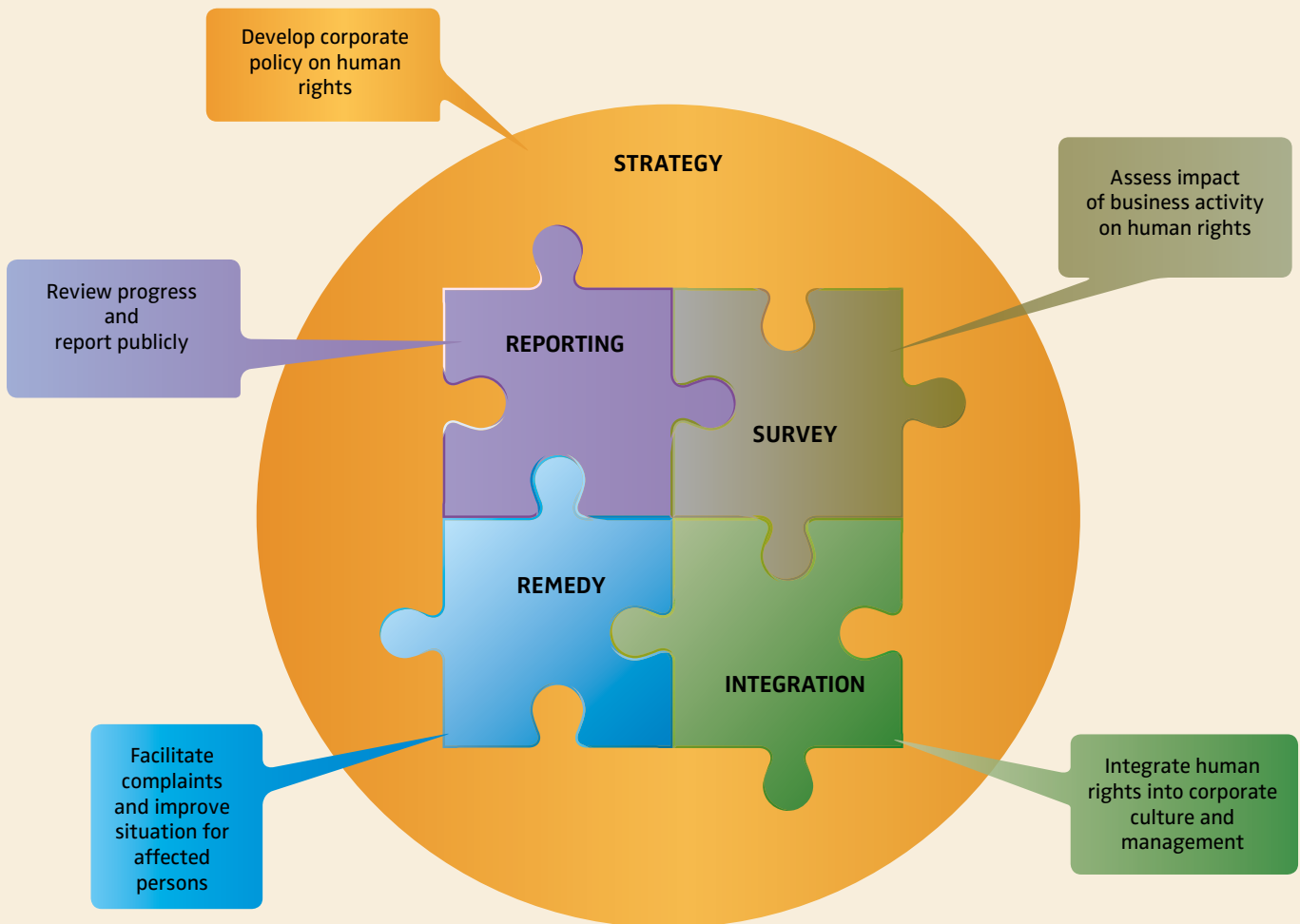
Overview of instruments

How can I read this guideline and implement it in my business?

This guideline addresses tour operators, assisting them in systematically implementing the UN Guiding Principles on Business and Human Rights. The implementation process is divided into five key fields of action: **Strategy**, **Survey**, **Integration**, **Remedy**, **Reporting**.

The five fields of action are derived from the business-relevant UN Guiding Principles 11 through 24 and 29 through 31. The methods, instruments and steps relevant for their implementation will be explained in the following chapters.

All fields of action **depend on each other**, are **closely intermeshed** and require **continuous mutual adaptation** in their implementation. The sequence of implementation may vary from business to business and depends, for instance, on the size of the company, the destinations, the nature and scope of service providers, and above all on the approach to human rights of existing management structures or business practices.



In general, the following procedure is advisable:

1. At the beginning of the process, **strategy** and **survey** are implemented in close coordination and, in part, simultaneously. The strategy covers the operational framework and objectives for the entire process cycle and contains a public and written commitment to human rights. The survey results are reflected in the development of the strategy.
2. Strategy and survey constitute the starting point for **integration**, **remedy** and **reporting**. These three fields of action are likewise implemented in close coordination and, in part, simultaneously.
3. Integration, remedy and reporting in turn form the basis to operationalise the **survey** (= continuous updating) as well as a **strategy** adjustment where applicable.

To facilitate the implementation of these fields of action, the following elements are outlined in the next chapters:

- The ✓ checklists summarise the most important implementation measures. If relevant, operational links or practical tools and methods are recommended for these measures. They are tagged with the Symbol ✕.
- The information boxes tagged with the ! symbol contain specific implementation instruments and explain selected issues in more detail.
- The 👁 symbol tags all those tools and in-depth sources of information that are summarised on pages 32–33 (Further Reading) and explained in more detail.

Following the five fields of action, we look at real-life situations on pages 28–31: the case studies of tour operators Kuoni and Studiosus illustrate ways of putting the featured instruments into practice.

! Tips for implementation in your business

This guideline is a general tool for tour operators to address human rights issues. Not every recommendation has the same relevance or is applicable for all businesses. The guideline provides a systematic approach for internal analysis and implementation. These are tips for an initial approach:

- Proceed step by step and seek the assistance of experts.
- Check and systematise, set priorities.
- Act according to the PDCA (plan-do-check-act) method.
- Start in areas like child protection, corporate social responsibility or risk management, for which tried and tested procedures and instruments already exist in the industry.
- Join forces with other businesses or associations to avoid duplication of work and to create synergies.

Human rights in the CSR system of TourCert: Information for certified companies

This guideline was developed in cooperation with TourCert, a non-profit organisation for certification in tourism. TourCert's CSR management and reporting system covers many requirements of the instrument featured here. Businesses certified by TourCert will find many parallels in the logic of the fields of action for individual prioritisation and consolidation. In general, TourCert criteria and minimum requirements have been adapted in accordance with the *UN Guiding Principles*.

STRATEGY

Developing a corporate human rights policy

The objective of developing a human rights-based corporate strategy and policy is to create the structural conditions for the long-term embedding of human rights into a business including its supply chain.

An important component of this strategy is to **commit in public and in writing to a commitment to human rights** and to acknowledge the UN *Guiding Principles* as a reference framework. This commitment serves as the basis for the development of

and adaptation to specific corporate guidelines on human rights. It is the key element for the management system and for internal and external communication.

The *Commitment to human rights in tourism* depicted below shall serve as guidance and template for tour operators. This template has been developed in consultation with non-governmental organisations and the tourism industry. Tour operators – regardless of size, structure and destination areas – can

Commitment on human rights in tourism

In our activities in the tourism industry, especially as tour operators, we work on a daily basis for and with people: customers, employees including subcontractors, and the local population at destinations. These people are the basis for our business success and the quality of the services we provide. We respect their human dignity and rights.

We acknowledge the Universal Declaration of Human Rights and its legal binding implementation instruments as the basis for our business activities, in particular:

- the International Covenant on Civil and Political Rights
- the International Covenant on Economic, Social and Cultural Rights, as well as
- the Labour Standards of the International Labour Organisation (ILO).

Tourism affects many aspects of human rights, such as the right to information and participation in decision-making processes, to protection against discrimination, to housing, food, water, health and education, to work with dignity, to join trade unions, to protection against forced labour and to privacy. Moreover, the human rights of potentially high-risk groups must be protected, especially migrant workers, children, women, indigenous people and people with disabilities.

We welcome the *Guiding Principles on Business and Human Rights (UNGPs)* of the United Nations Human Rights Council. On their basis, we commit to our human rights responsibility and due diligence in tourism:

1. We have a human rights-based corporate policy.
2. Within the scope of our corporate possibilities, we carefully check the impact of our business activities on human rights.
3. We integrate human rights policy into our corporate culture, into the business management and into our cooperation with subcontractors.
4. We implement an appropriate grievance mechanism and strive to provide remedy in case of human rights abuse.
5. We frequently review the progress of our measures and report publicly.

We pursue the aim to constantly improve the human rights situation at the destinations where we are active. In dialogue with our employees and external stakeholders, we consistently conduct – within the scope of our influence – the implementation of human rights due diligence and agreed goals for continuous improvement.

adopt it as a general public commitment to human rights. The five fields of action mentioned have been formulated on the basis of the UN *Guiding Principles on Business and Human Rights*, particularly regarding the business-relevant Principles 11 through 24 as well as 29 through 31, and comply with the fields of action in this guideline.

Based on the *commitment*, tour operators can develop a specific corporate human rights strategy. **The approach may vary from business to business.** It depends on size, structure, product portfolio, destination, ownership structures and already existing corporate practices.

Many tour operators already work with guidelines that contain numerous references to human rights, such as directives on personnel management, on product design or on contracting. Human rights, moreover, are often part of sustainability strategies, even if they are not always explicitly specified as such. It is recommended to **supplement and consolidate existing strategies and guidelines regarding issues of human rights.**

The aim is that employees, subcontractors and customers are clearly informed about the corporate approach regarding human rights. In doing so, the reference framework should always explicitly remain the International Bill of Human Rights, that is, the *Universal Declaration of Human Rights (UDHR)*, the *International Covenant on Civil and Political Rights*, the *International Covenant on Economic, Social and Cultural Rights (ICESCR)*, and the Labour Standards of the International Labour Organisation.

To allow the strategy to take full effect in the business routine, it must be developed on the basis of a careful analysis of the adverse human rights impacts with which a business enterprise may be involved (**survey**). The fields of action 'strategy' and 'survey' are closely linked and should thus be continuously and mutually checked and adapted.

An important basis for mainstreaming the human rights strategy in business is its **adoption and thus assumption of responsibility at the most senior level of the business enterprise.**

✓ CHECK LIST Develop corporate policy for human rights

- Ensure binding engagement at the most senior level of a company
- Public commitment to human rights
 - ✳ *Commitment to human rights in tourism*
- Analysis of corporate management capabilities regarding human rights due diligence
 - ✳ *Tools for analysis, e.g. 👁 human rights quick check for tour operators, 👁 OCAI – Organisational Capacity Assessment Instrument*
- Identify human rights conflict-affected and high-risk areas by involving internal and external stakeholders
 - ✳ *Survey*
- Develop human rights guidelines or strengthen existing corporate policy regarding its human rights references
- Acknowledge relevant guidelines and principles of conduct and integrate them into the guidelines
 - ✳ *International Bill of Human Rights (UNHR, ICCPR, ICESCR, ILO Labour Standards etc.), OECD Guidelines for Multinational Enterprises, UN Guiding Principles on Business and Human Rights, Code of Conduct for the Protection of Children from Sexual Exploitation in Travel and Tourism (www.thecode.org), Ten Principles of UN Global Compact etc.*
- Adopt corporate human rights policy; external and internal communication
 - ✳ *In larger companies, this may involve a longer process, which should be included using intermediate steps in the action plan werden (integration).*

SURVEY

Assessing the impacts of business activities on human rights

Careful, systematic and frequent analysis of the impacts that business activities have on human rights is required to indicate the **strengths and weaknesses as well as opportunities and risks**. A survey is linked to the **strategy** development and provides a basis for the **integration** of measures into corporate processes.

A first significant step in conducting a survey is to **identify all relevant internal and external stakeholders**. Subsequently, and in dialogue with those stakeholders, **the actual or potential human rights impacts of business activities** are identified. This step is called Human Rights Impact Assessment. In the implementation of these measures, the generation of a **stakeholder map and a materiality matrix** is recommended (! pages 18–19).

When the company conducts the survey and the stakeholder dialogue for the first time, the results have to be included in the **strategy** development. Part of the continuous updating will be an assessment of necessary changes or adjustments.

Within the course of the survey two crucial questions need to be answered:

Which human rights issues should I assess?

In keeping with the *UN Guiding Principles*, businesses are principally required to assess their business activities regarding all impacts on human rights. In the process, special attention should also be given to human rights risks affecting a large group of persons, or risks that could have a particularly severe effect for a small number of people. In addition, such fields are particularly relevant when potential damage is irremediable. It is recommended that tour operators approach the issue

“step by step” and set priorities according to the relevance of tourism activities and the respective areas of destination. (! Stakeholder Map & Materiality Matrix, page 19). A collection of brief examples and further information provides some guidance in the chapter Significance in tourism (pages 6–9). Additionally, tour operators can draw on their own experiences with human rights issues, such as child protection, or in assessing labour conditions in the supply chain.

How can I assess the human rights impacts of my subcontractors with due diligence?

This question is crucial for tour operators who have mostly complex and differentiated supply chains: in larger businesses the number of business relationships may well run into the thousands. Once again, this is a matter of prioritising according to the principles *relevance and opportunity for action*. Hence, an initial step may be to assess all direct suppliers who are particularly relevant in the product portfolio, for example, due to sales figures, number of overnight stays, indirect suppliers whose location increases the risk of adversely affecting human rights, the stakeholders involved, or other available information. In the assessment of business relations, it is advisable to exchange experiences with other tour operators and to cooperate in the implementation across the industry.

The question of how comprehensive the survey should be is one that is continuously faced by a tour operator and one that will never be universally answered. Guidance is provided by the principle that the **assessments of all relevant stakeholders will be included in an open and participative dialogue**, and that a high degree of process and learning orientation is involved in the procedure. It is the only way to do justice to the external demands made on one's own business.

✓ CHECK LIST Assess the impact of business activities on human rights

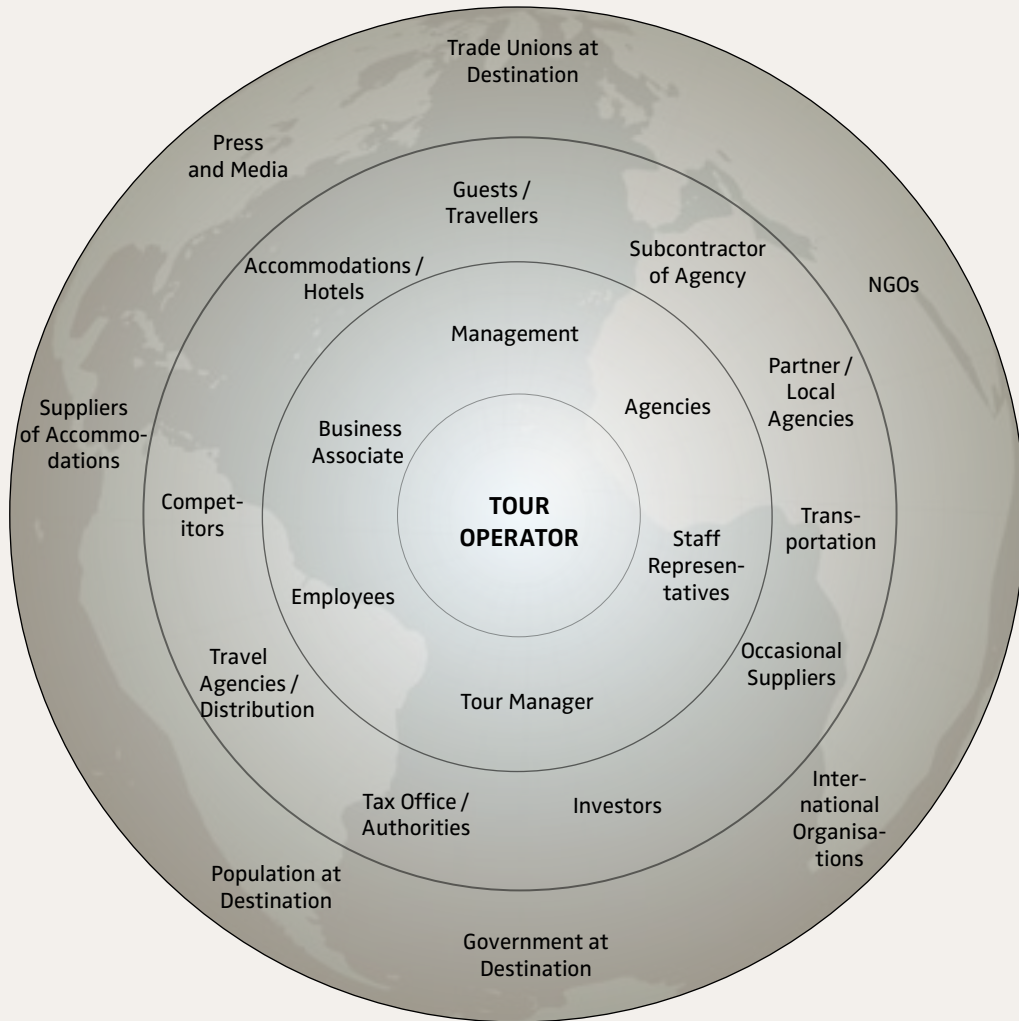
- Identification of relevant stakeholders
 - In the enterprise and its immediate environment (e.g. proper employees)
 - in business relationships (e.g. suppliers and their employees)
 - outside the immediate business relationships (e.g. communities, agencies, NGOs, trade unions etc.)
 - ✂ ! Stakeholder map (page 18)
- Analyse adherence to human rights and identify human rights fields which the business enterprise can effectively influence
 - at the proper business location (Which aspects of human rights have an immediate effect on the company?)
 - in the destinations and at the subcontractor sites (including: which risks of "complicity" may arise due to business relations?)
 - ✂ Evaluation of existing secondary data (e.g. country specific human rights reports, industry reports etc.), expertise of third parties (e.g. human rights organisations, governmental bodies), assessment by responsible senior staff or product managers, respectively.
- Structured consultation of internal and external stakeholder groups regarding the identified human rights fields of conflicts and hazards
 - based on the stakeholder map
 - ensure the anonymity of the interviewees (where relevant or necessary)
 - include insights from established grievance mechanisms (remedy)
 - ✂ (Online) questionnaires, private interviews based on (semi-) structured guidelines, moderated dialogue etc.
- Assess results by means of a materiality analysis
 - which human rights fields are relevant for the stakeholders and in which human rights fields can I implement measures as a business enterprise?
 - To which business partner / supplier should I pay special attention?
 - Prioritisation must be assessed and adjusted following each step of survey.
 - ✂ ! Materiality matrix (page 19)
- Document survey and review it for further measures
 - include results in strategy, integration und remedy einfließen lassen
 - derive indicators from the identified problem areas, integrating them into reporting
 - ✂ Assessment report / protocol on survey
- Frequently repeat survey and improve it continuously using the findings from the other fields of action



! Stakeholder map and materiality matrix

The objective of the stakeholder map is to identify the essential and strategic stakeholders of a tour operator. In the following example, stakeholders are divided into two groups: internal stakeholders and external stakeholders, with the latter group again divided into those, who have business relations with the tour operator (commercial), and those who do not (non-commercial, e.g. the population in the destination country).

Exemplary stakeholder map of a tour operator

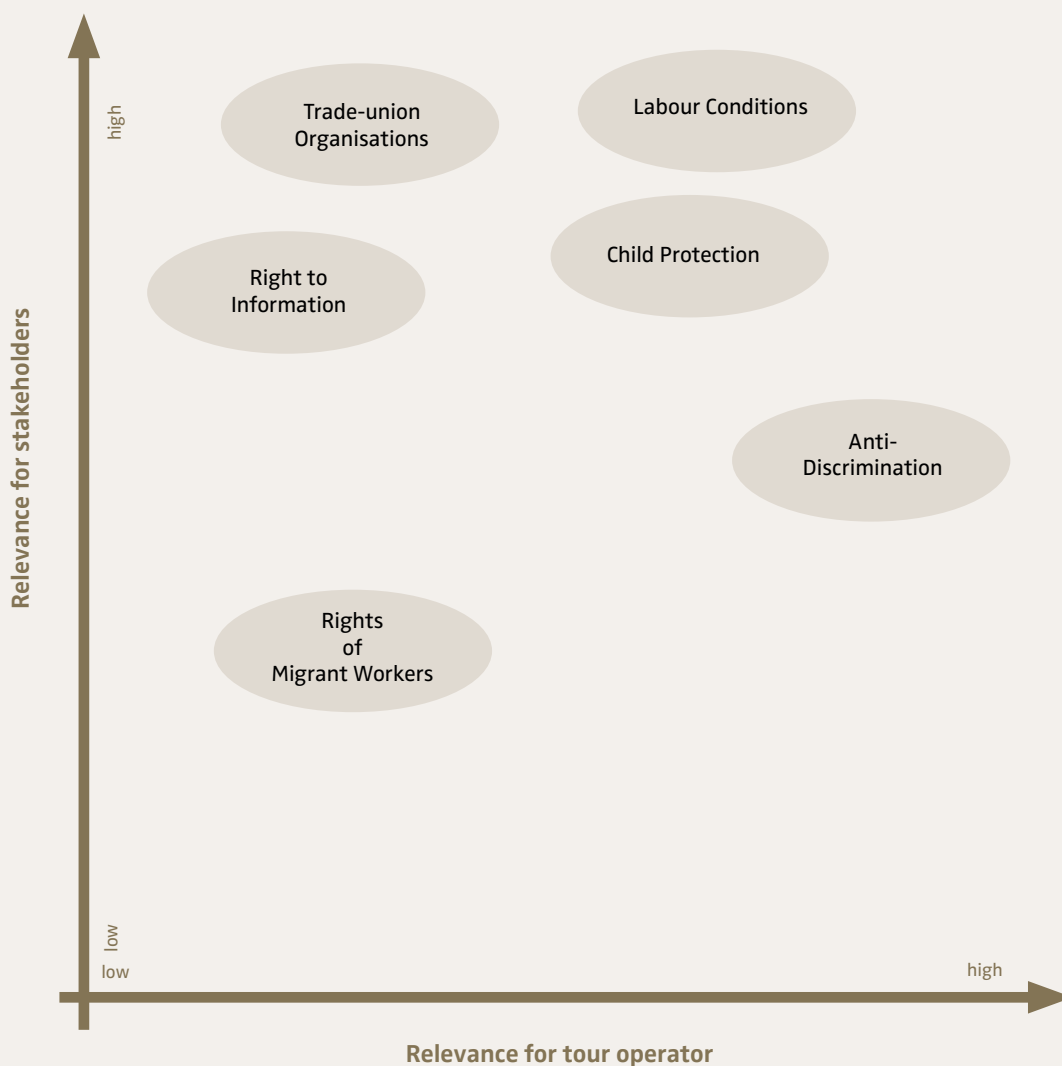


Inner ring: internal stakeholders
 Middle ring: commercial stakeholders
 Outer ring: non-commercial stakeholders

Consultation with relevant stakeholders results in the identification of human rights issues that are of specific relevance. A *materiality matrix* enables a diagrammatic connection of these standards with the activities of the tour operator. For the tour operator, its relevance may refer to his own action potential or to the business itself.

An internal team determines the structure (and thus the axes) as well as the priorities. The diagram draws attention to the main points and, with aims and measures, substantiates the fields considered relevant by both sides.

Exemplary materiality matrix



Practical survey example::

👁️ *Assessing Human Rights Impacts in Kenya*

INTEGRATION

Integrating human rights into business culture and management

Integrating a human rights approach into business routine and management takes place on the basis of **Strategy** and **survey**. In the current field of action, **specific improvement measures** are developed and operationalised with particular **attention given to the risk areas identified in the survey**.

The first step towards operationalisation is **appointing a body or person to coordinate** the corporate human rights policy. This body should be affiliated at senior management level and must have sufficient control of budget, time and authority. In so doing, it must be ensured that human rights due diligence will be respected in all of the company's processes and areas, and not merely remains a task of the appointed body.

The central control instrument for integrating a human rights approach into management structures is a **human rights action plan**. This systematically summarises all implementation measures and establishes the respective time horizons and responsibilities (! Human Rights Action Plan, pp. 22–23). The Action Plan should draw on the International Bill of Human Rights and be incorporated – where applicable – into already existing instruments (e.g. sustainability or CSR improvement programmes). Subsequently, it will be linked to the development of performance indicators for the progress review (**reporting**).


In preparing an action plan, it is crucial that the planned measures cover **all areas of the business and its supply chain** and – wherever possible – provide incentives for learning processes so as to advance further improvements within the organisation.

Important to this end is the **agreement on clear human rights standards and principles of conduct** with the own employees as well as with service providers. Internally, this may be implemented for example with a *General Code of Conduct for Employees* or by means of specific procedural instructions for the different corporate task areas (product development, purchasing, human resources etc.). Regarding the suppliers, the development of a Supplier Code of Conduct is recommended. This document is considered a mutual agreement between a tour operator and one of his service suppliers. It contains principles of conduct for both parties and can be integrated through clauses into existing contracts or annexed completely to them.

Another key factor is that the company practices **systematic awareness raising and qualification** of everyone involved regarding human rights. For the successful implementation of a human rights policy, it is essential that the entire business staff is aware of the issue and is appropriately trained in the matter. Senior staff in particular must command the required knowledge and power of judgement to make correct and sensitive decisions – their example provides guidance for other employees (! Education and Awareness Raising, page 21).



✓ CHECK LIST Integrating human rights in corporate culture and management

- Appoint body/person to steer human rights policy and provide him/her with sufficient budget, time and authority
 - ✘ *Management, human rights representative, body responsible for CSR etc.*
- Converge goals and improvement measures with defined responsibilities and time frame in an Action Plan
 - ✘ **!** *Human Rights Action Plan (pages 22–23)*
- Take measures to integrate principles of conduct in own corporate processes
 - ✘ *General Code of Conduct for Employees, internal procedural instructions, for instance, in areas such as product development (selection of destinations or itineraries), purchasing (selection of hotels and service providers), human resources, tour guides, customer communication etc.*
- Take measures to integrate or rather reinforce human rights standards into cooperation with service providers
 - ✘ *Review existing contracts and templates, introduce a Supplier Code of Conduct (Example:  TourCert Supplier Code of Conduct)*
- Take measures to convey basic knowledge and build awareness among employees and suppliers
 - ✘ *Education and coaching for specific target groups, e.g. for corporate governance, CSR/sustainability management, risk and compliance management, product management, human resources, purchasing, tour guides, sales etc. (! Education and Awareness Raising)*
- Continuously monitor effectiveness and efficiency of measures by means of performance indicators
 - ✘ *Reporting*

! Education and Awareness Raising

Internal educational measures should essentially pursue three objectives: Learners shall become familiar with the international human rights framework and standards expected from their company.

They shall become aware of the conflicting human rights areas of their business activities. And moreover, they shall be competent in finding solution strategies and making the right decisions.

Online Training: Human Rights in Tourism

The *Roundtable Human Rights in Tourism* has developed an open access online training to introduce tour operator experts to the subject.

In addition, examples of basic knowledge concerning human rights in tourism illustrate how the protection of human rights is put into practice. The modules are adapted to the five fields of action in this guideline.

Extent: 5 modules

Duration: 2–3 hours

Created by Nina Sahdeva, arbeitskreis tourismus & entwicklung (akte – Working Group on Tourism and Development)

For more information visit:

www.humanrights-in-tourism.net



The adopted corporate human rights policy can serve as a basis to adapt or develop demand-oriented tutorials for different internal target groups – e.g., senior management, hotel purchasing / contracting, product management, or tour guiding – as well as supplement existing advanced training.

! Human Rights Action Plan

Exemplary Human Rights Action Plan for a medium-sized tour operator specialised in Sout East Asia (approx. 50 employees);

Period: 01/2013-12/2013;

No.	Area of Measures	Aim	Measures	Responsibility	Date of Creation (MM/JJJJ)	Dead-line (MM/JJJJ)	State of Implementation	Notes
1	Management	Integrate human rights in all management processes and procedural instructions	Check and review procedural instructions in the departments marketing / public relations, production, purchasing and human resources regarding human rights	All heads of department	01/2013	08/2013	in process	In consultation with the human rights representative
2			Sign <i>Code of Conduct for the Protection of Children from Sexual Exploitation in Travel and Tourism</i>	senior management	01/2013	03/2013	done (2/2013)	Human rights representative subsequently initiates implementation
3	External communication	Public commitment to human rights	Supplement corporate mission statement with human rights clause	senior management	01/2013	01/2013	done (1/2013)	
4			Post <i>Commitment to Human Rights in Tourism</i> on website and communicate via press release	head of marketing & PR	01/2013	01/2013	done (1/2013)	
5	Internal communication	Integrate human rights into internal communication	Put human rights / action plan on the agenda of the monthly head of department meetings	senior management	01/2013	02/2013	done (2/2013)	
6			Introduce human rights into internal "newsletter"	human rights representative	01/2013	02/2013	done (2/2013)	
7	Training & tutorial	Qualify and raise awareness of employees	Conduct workshop for senior staff	senior management	01/2013	03/2013	done (3/2013)	Consult external human rights experts
8			Employees of the departments production, purchasing und distribution complete online tutorial	heads of production, purchasing und distribution	01/2013	12/2013	in process	In consultation with Human Resources
9			Review staff manual	head of human resources	01/2013	10/2013	not yet started	

No.	Area of Measures	Aim	Measures	Responsibility	Date of Creation (MM/JJJJ)	Deadline (MM/JJJJ)	State of Implementation	Notes
10	Cooperation with service providers	Reinforce human rights standards in contracting	Develop Supplier Code of Conduct, translate it into relevant languages and send it to all service providers	head of production	01/2013	10/2013	in process	Include results from human rights impact assessment
11		Raise awareness of service providers for human rights	Develop guideline for purchasers on the issue of the human rights situation for company visits		01/2013	07/2013	not yet started	In consultation with purchasing department
12	Human rights impact assessment and stakeholder dialogue	Interview external stakeholders on potential human rights impacts of our business activity	Consult local population and staff regarding our tour programmes in Thailand (= destination with the highest turnover). Conduct 4 dialogue events in cooperation with a local NGO.	human rights representative	01/2013	05/2013	in process	Involve product managers and tour guides. Previously obtain thorough analysis of secondary information on human rights situation in Thailand
13			Analyse results from consultation process in Thailand and include them into management system / measure planning	human rights representative	01/2013	07/2013	not yet started	
14	Grievance mechanism	Establish anonymised grievance mechanisms for internal and external stakeholders	Explore possibilities for cross-company grievance mechanisms at associations, authorities and other tour operators	human rights representative	01/2013	06/2013	in process	Otherwise establish internal grievance procedure
15	Review progress / Reporting	Assess effectiveness of management system and measures	Develop indicators and initiate data collection process	senior management	01/2013	06/2013	in process	In consultation with senior management and heads of department
16		Report transparently about the human rights process	Integrate human rights management and indicators into the existing sustainability report based on the G4 sustainability reporting guidelines	human rights representative	01/2013	12/2013	not yet started	

REMEDY

Facilitate grievance and improve the situation of the affected

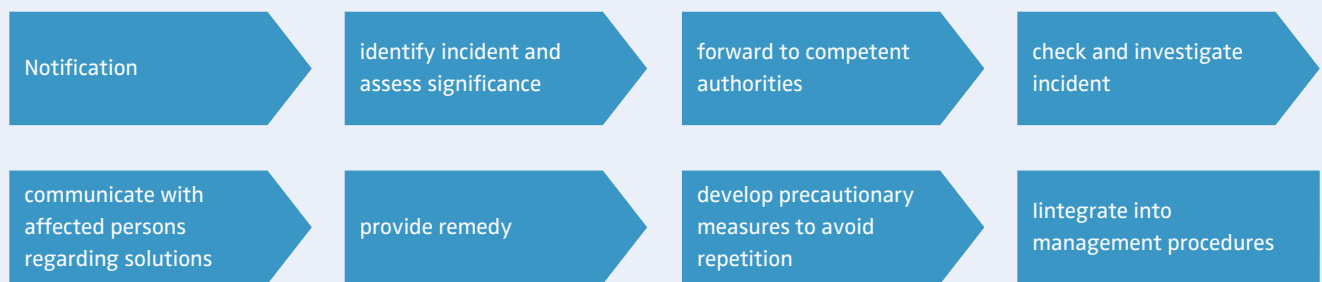
In corporate risk and quality management, effective grievance and notification procedures are instruments to **identify concrete human rights violations as soon as possible and to provide improvements and remedy**. They improve communication with customers, the local population, business partners and other stakeholders. Hence, grievance and notification procedures must be accessible to all interest groups.

Grievance procedures must be accessible in particular to people who have been **harmed by entrepreneurial activities** – whether inside or outside the company. It is important that affected parties can be represented by legal experts, trade unions or NGOs vis-à-vis the business. In addition, **notification mechanisms** must also be accessible to persons who have **witnessed human rights abuses**, e.g. travellers. The protection of victims must take the highest priority in grievance and notification procedures.

An initial step in the introduction of a company-induced grievance procedure is the comprehensive identification of groups and individuals potentially affected by human rights abuse (**survey**). Depending on the business area and size, it should be evaluated if a genuine sector-specific solution is preferable or if grievance offices should be located for example within associations or NGOs.

However, these mechanisms are by no means **an adequate substitute for public legal procedures or non-judicial grievance offices**, such as the national contact points of the OECD. Businesses must always facilitate free access to legal proceedings and out-of-court grievance procedures, and should cooperate in external procedures.

From grievance or notification procedure to effective management tool



✓ CHECK LIST Facilitate grievances and improve situation for affected persons

- Determine target group:
 - Immediately affected persons inside and outside the company and their representatives (grievance office).
 - Persons who wish to report their observations (notification office).
- Protect injured parties and informants against negative effects; if necessary, preserve their anonymity.
- Determine notification modalities: to whom and how can something be reported?
The grievance mechanism must be easily accessible (low-threshold and barrier free).
- Define route, handling time of complaints and competences – depending on type, severity and urgency of the reported events.
- Identify cooperation opportunities with state and non-state agents (e.g. law enforcement authorities).
- Inform and instruct the persons involved in the proceedings:
 - Persons who receive complaints and their seniors.
 - Persons who want to make a complaint or notification.
- Equip the notification offices with sufficient personnel, authority and clear procedural instructions regarding the objective assessment of the incoming notifications.
- External evaluation or review of reliability and confidentiality of the notification procedure.
- Provide remedy for identified human rights abuses:
 - *Remedy*: effective and timely measures to improve the situation of the persons affected.
 - Reach an understanding with the persons affected regarding the appropriateness of the planned remedy measures.
 - Ensure legal compliance: remedy measures must comply with recognised human rights standards.
- Systematisation of reported incidents and integration into **survey** to avoid repetition.

! Prerequisites for an efficient grievance mechanism

- Individuals and groups that are potentially affected by human rights abuses (right holder)
 - are familiar with the grievance office,
 - trust it,
 - can easily use it,
 - have access to information and consultancy in using the grievance office and
 - are protected against negative consequences (victim protection).
- Procedures and deadlines in the handling of complaints are transparent, appropriate and conceivable.
- The situation of the people affected by grievances is improved by appropriate and timely remedy measures, which are negotiated in dialogue with the affected parties and legally compliant.

For more information on remedy and grievance mechanism, see:


- 👁 ACCESS Facility
- 👁 Rights-Compatible Grievance Mechanisms – A Guidance Tool
- 👁 The Right to Remedy, Ludwig Boltzmann Institute for Human Rights

REPORTING

Conduct progress review and report publicly


Public reporting and a frequent progress review, which includes robust indicators to measure effect and success, are all part of the process involved in permanently embedding human rights due diligence into businesses. In so doing, **internationally acknowledged standards** should be applied, such as the guidelines of the *Global Reporting Initiative (GRI)* or the *UN Global Compact's Ten Principles*.

If sustainability reporting is already conducted on the basis of recognised standards, it is recommended that human rights aspects are integrated or strengthened in the already existing system. In addition to the **inclusion of specific indicators for the human rights sector**, it must be ensured that the **extent of stakeholder involvement** (in all relevant areas of strategy development, impact analysis and possible compensation at local level) is reported. In addition to the internal processes, the impacts of supply chains and business relations

should also be reported. It is recommended to refer to the  *GRI G4 Sustainability Reporting Guidelines*.

To develop the desired steering effect, the performance indicators must be intermeshed with all processes in the other fields of action. Hence, the set of indicators should, for instance, measure in particular those areas classified by the **survey** as relevant. Likewise, the indicators should be used frequently to measure the implementation results of the action plan (**integration**) and the effectiveness of the grievance mechanism (**remedy**). Alternatively, the development of these performance indicators over time may provide information that indicates whether the **strategy** needs to be revised.

Within the scope of reporting, **internal processes to review the human rights management system** or to **acknowledge external auditing and validation procedures** should be employed.

✓	CHECK LIST	Conduct progress review
		<ul style="list-style-type: none"> • For already existing monitoring systems: identification of existing and future performance indicators with human rights references • Development or integration of robust indicators for the following areas: <ul style="list-style-type: none"> - Effectiveness and efficiency of management tools - Extent of stakeholder involvement - Effectiveness of training and awareness raising measures in companies and for service providers - Extent and quality of human rights-related customer information - Effectiveness of survey - Effectiveness of grievance mechanism - Effectiveness of arbitration and remedy measures in identified human rights abuses ✂ ! Exemplary indicators (page 27),  <i>GRI G4 Sustainability Reporting Guidelines</i>, survey results • Operationalise data collection • Integrate indicators into the action plan for the purpose of steering and result checking <ul style="list-style-type: none"> ✂ ! <i>Human Rights Action Plan</i> (pages 22–23) • Frequently evaluate and advance indicators • Develop procedures for internal auditing or use respective external validation procedures <ul style="list-style-type: none"> ✂ <i>Internal audit, certification initiatives</i>

✓ CHECK LIST Public reporting

- Devise standardised reporting according to recognised standards
 - ✂️ 👁️ *GRI G4 Sustainability Reporting Guidelines, Ten Principles of UN Global Compact etc.*
- Frequent documentation and interpretation of:
 - risks
 - identified human rights abuses
 - remedy measures taken
 - performance
 - progress
 - aims
- Integration into existing report formats
 - ✂️ *Sustainability report, business reports etc.*
- Publication of report on a regular basis and active communication with stakeholders

! Exemplary indicators for tour operator with human rights reference

Management

- Number of service providers who have signed a *Supplier Code of Conduct* or contractually agreed to standards and labour conditions
- Number of investment agreements with human rights clauses
- Number of measures to reduce identified human rights hazards

Survey / human rights impact assessment

- Number of destinations checked within the scope of survey
- Number of destinations with corruption risks
- Number of stakeholders interviewed on human rights risks
- Existence of a business-related itemisation/chart of human rights risk areas (yes / no indicator)
- Number of service providers with whom an active dialogue on human rights is being conducted
- Number of service providers with whom human rights risks have been identified
- Non-discrimination staff satisfaction index (anonymous employee survey)

Awareness raising and training

- Number of human rights trained employees
- Number of human rights training programmes for service providers

Customer information

- Existence of customer information on human rights, e.g. in the scope of travel leaflets, country information, consultations etc. (yes / no indicator)


Grievance and remedy

- Number of incidents reported at the grievance office
- Number of complaints satisfactorily resolved for the affected party

Implementating human rights strategies

How have tourism businesses proceeded?

Case study: Kuoni


Kuoni has been dealing for quite some time with the human rights relevant aspects of tourism. Hence in 2006, the group signed the Code of Conduct for the Protection of Children and advocates respecting fair labour standards in the supply chain. Publication of the study  *Putting Tourism to Rights: A Call for a Human Rights Approach in Tourism* has not only put things into perspective, but also triggered a systematisation of the approach.

Within the scope of a stakeholder dialogue, the Kuoni Group developed a *Statement of Commitment on Human Rights* and an action plan for its implementation. In this context, a survey and human rights impact assessment pilot project was conducted in Kenya. The experiences gained throughout are meant to help as far as possible in a next step to standardise the process of human rights due diligence.



Implementing human rights						
No.	Implementation measures	Field of action				
		Strategy	Survey	Integration	Remedy	Reporting
1.	Specification of corporate responsibility already embedded in the <i>Kuoni Code of Conduct</i> in the Statement of Commitment on Human Rights and its adoption by senior management. Priority is given to the protection of children, the safeguarding of fair labour conditions and an on-going human rights due diligence.	X				
2.	Checking the impacts of business activities on human rights within the scope of a survey and human rights impact assessment . The impacts were assessed on the basis of business risks and business influence, from which subsequently mitigation measures were derived. The following priorities accrued: <ul style="list-style-type: none"> Labour conditions within Kuoni Private Safaris (especially access to grievance mechanisms) Labour conditions for hotel staff (wages, casual contracts, access to management, working hours) Fair distribution of income from tourism Child protection, child labour, commercial sexual exploitation of children Societal influence and the right to an appropriate living standard 		X			
3.	Development of stakeholder dialogue for exchange of experience and critical reflexion		X			
4.	Integrating issues into training schemes and establishing an internal network			X		
5.	Conducting risk assessment to extend survey and human rights impact assessment to other countries		X			
6.	Internal working groups for the implementation and initialisation of improvement measures: <ul style="list-style-type: none"> Implementing a Supplier Code of Conduct in any supplier contract, monitoring according to the <i>Travelife Certification Scheme</i> Integrating into existing internal audit procedures Developing guidelines for further replication of the human rights due diligence process 		X	X		X
7.	Establishing notification office at cr@kuoni.com. The notification address is attended by the Corporate Responsibility department as well as by the Compliance Committee, which initiates the necessary measures.				X	
8.	External information and raising customer awareness via various communication channels			X		
9.	Integrating human rights aspects into the existing format of the Kuoni Sustainability Report according to the criteria of the Global Reporting Initiative (GRI). Constant update on progress at: www.kuoni.com					X

Case study: Studiosus

The mainstays in Studiosus's Mission Statement are *fair business relations and assuming social responsibility*. Thus, for years, social responsibility has been part of the corporate sustainability management and labour processes. Publication of the study  *Putting Tourism to Rights: A Call for a Human Rights Approach in Tourism* shows that Studiosus already fulfils the majority of human rights-related demands. Yet, at the same time, an improved structure was sought to assess the measures already taken and those necessary in the future.

Studiosus decided to put a process into motion based on the study, the *UN Guiding Principles on Business and Human Rights* and the *ILO Labour Standards*, which makes the implementation structure of human rights comprehensible within the company. This enabled a notably quicker integration of social issues into the company's tourism processes.



Implementing human rights						
No.	Implementation measures	Field of action				
		Strategy	Survey	Integration	Remedy	Reporting
1.	Inclusion of Statement of Commitment on Human Rights into the corporate mission statement.	X				
2.	Survey per country by Studiosus's regional experts and tour guides to identify possible relevant human rights problems in the context of the tours offered.		X			
3.	<i>At the same time:</i> Internal and external talks to exchange experiences		X			
4.	Integration of human rights issues into innovation events, regional / country seminars and workshops for tour guides			X		
5.	New strategic aim to advance the respect for human rights and the integration of first goals and measures into the already existing sustainability programme (= action plan)	X		X		
6.	For the implementation of measures, the analysis of the country survey indicated the following human rights priorities: <ul style="list-style-type: none"> • Labour conditions for staff of coach operators, labour conditions for hotel staff (time off, working hours, wages, accommodation, social security) • Child labour / child protection • Protection against discrimination of religious, language, ethnic and/or cultural minorities • Protection of privacy • Right to adequate standard of living (especially food and water) 		X			
7.	Putting this into effect resulted in three priority areas of work or measures respectively: <ul style="list-style-type: none"> • Cooperation with suppliers (e.g. coach operators, hotels, agencies) • Programme design (e.g. for encounters and sightseeing) • Obligation to inform customers (via tour guides, catalogues, tour information and other) 			X		
8.	Working groups to initiate improvement measures: implementation of social passages / clauses in all supplier contracts and their subsequent translation into English, Spanish, French and Italian, as well as distribution. <ul style="list-style-type: none"> • Working Group Coach to develop social clauses in the contracts with service partners • Working Group Hotel to develop social clauses in the contracts with service partners • Working Group Tour Guiding to develop a code of conduct for service partners 			X		
9.	Development and distribution of a Supplier Code of Conduct			X		
10.	Establishing notification office at HumanRightsAlert@studiosus.com. The notification addresses are attended by the Committee on Social Responsibility, which will initiate the necessary measures.				X	
11.	External information on stewardship of human rights at Studiosus			X		X
12.	Monitoring: <ul style="list-style-type: none"> • Development of questionnaire for service partners for the purpose of frequent survey and additional awareness-raising • Test run the questionnaire with selected hotels with subsequent analysis • Dispatch questionnaire to all hotels, subsequent analysis 			X		X
13.	Integrating human rights aspects into existing format of Studiosus Sustainability Report according to the criteria of the Global Reporting Initiative (GRI).					X

Further Reading

Practical tools and further information

ACCESS Facility

ACCESS Facility is a global non-profit organisation that supports rights-compatible, interest-based problem solving to prevent and resolve human-rights conflicts between companies and communities. ACCESS Facility curates an online database with field reports about effective ways to solve problems and a list of grievance mechanisms.

www.accessfacility.org

Alles was Recht ist – Menschenrechte und Tourismus (German version, English summary)

Protestant Development Service/Tourism Watch, 2011, in cooperation with the Working Group on Tourism and Development -akte.

The study describes the international human rights instruments in matter of global tourism. The short version “**A Call for a Human Rights Approach in Tourism**” summarises the main demands and recommendations from the study.

http://tourism-watch.de/files/eed_tourism_human_rights_shortversion_2011_en_2.pdf

http://tourism-watch.de/files/Alles_was_Recht_ist.pdf

Putting Tourism to Rights. A challenge to human rights abuses in the tourism industry

Tourism Concern, 2009

This report exposes the violations of human rights that have occurred as a direct result of tourism through an examination of key articles of the UDHR and subsequent UN declarations. It challenges the UK Government and industry to recognise that human rights are a fundamental element of any sustainable approach to development – including tourism development, and calls for action to ensure their protection.

<http://www.tourismconcern.org.uk/putting-tourism-to-rights.html>

Assessing Human Rights Impacts in Kenya

Kuoni, 2012

In 2012, Kuoni conducted a human rights impact assessment in a selected destination. The pilot project included a first assessment of the human rights risks and impacts connected to the business activities and relations of Kuoni in Kenya. The project report describes the assessment process, its results and the possible measures that accrued.

<http://www.kuoni.com/corp-responsibility>

Gri G4 Sustainability Reporting Guidelines

The GRI Sustainability Reporting Guidelines are widely used for the preparation of sustainability reports. The current G4 Guidelines, comprehensively reviewed in 2013, include for example specific criteria in the field of human rights, and consider the involvement of stakeholders as well as the supply chain as standard elements in the reporting process.

<https://www.globalreporting.org/reporting/g4/Pages/default.aspx>

Respecting Human Rights – An introductory guide for business

Published by Global Compact Network Germany (DGCN), twenty-five Ltd, German Institute for Human Rights (DIMR) & 2013

This guideline depicts the chances and challenges involved in the issue of human rights. Essential human rights are explained by using real-life examples, and their meaning for business activity embedded into case studies.

http://www.globalcompact.de/sites/default/files/themen/publikation/respectinghumanrights_148x220_131029_download.pdf

My Business and Human Rights

European Commission, 2012

This European Commission guide was developed in specific for small and medium-sized enterprises for the implementation of the UN Guiding Principles on Business and Human Rights.

http://ec.europa.eu/enterprise/policies/sustainable-business/files/csr-sme/human-rights-sme-guide-final_en.pdf

Organisational Capacity Assessment Instrument (OCAI)

The Global Compact Network Germany website provides a starting tool that contains a self-assessment questionnaire with 22 questions centred on the major elements of the corporate responsibility to respect human rights. Businesses can analyse their management capacities with regard to fulfilling human rights due diligence and identify goals.

https://www.globalcompact.de/tools/ocai_en

Quick-Check “Human Rights” for Tour Operators

For a head start into a tourism-related business analysis to evaluate key issues surrounding the human rights agenda, the non-profit organization for certification TourCert provides a checklist with a strengths and weaknesses profile.

<http://www.tourcert.org>

Rights-Compatible Grievance Mechanisms: A Guidance Tool for Companies and Their Stakeholders

Corporate Social Responsibility Initiative, Harvard University, 2008

This tool provides a step-by-step guidance for companies in the concept and implementation of effective private grievance mechanisms.

http://www.hks.harvard.edu/m-rcbg/CSRI/research/publications/Workingpaper_41_Rights-Compatible%20Grievance%20Mechanisms_May2008FNL.pdf

TourCert Supplier Code of Conduct

The Supplier Code of Conduct of the CSR certification organisation contains fundamental human rights demands and may serve as guidance and a template for tour operators in developing their own supplier code.

<http://www.tourcert.org/index.php?id=tourcert&L=1>

The Corporate Responsibility to Respect Human Rights: An Interpretative Guide

United Nations, 2012

This guide by the Office of the United Nations High Commissioner for Human Rights provides additional background explanation to the UN Guiding Principles on Business and the “Protect, Respect and Remedy” Framework to support a full understanding of their meaning and intent.

http://www.ohchr.org/Documents/Publications/HR.PUB.12.2_En.pdf



Roundtable Human Rights in Tourisms

Presentation of Members



Since 1991, the Hamburg based tour operator **a&e erlebnis reisen** provides tours into 80 countries worldwide. True to the company's motto "Meeting at Eye Level", the focus of the sustainable tour concepts is the exchange with people in their foreign cultures. a&e erlebnis reisen is CSR certified.

www.ae-erlebnisreisen.de



arbeitskreis tourismus & entwicklung

arbeitskreis tourismus & entwicklung (akte – Working Group on Tourism and Development) campaigns for the rights of the native populations in the destination areas and advocates fair trade in tourism in a critical dialogue with the travel industry. Via its website **akte** encourages travellers to be informed consumers.

www.akte.ch | www.fairunterwegs.org



Deutsches Global Compact Netzwerk

The **UN Global Compact** is a strategic policy initiative for businesses that are committed to aligning their operations and strategies with ten universally accepted principles in the areas of human rights, labour, environment and anti-corruption.

www.unglobalcompact.org



Forum anders reisen is a business association of about 130 tour operators committed to sustainable tourism. It stands for travel experiences guided by the human being and the environment. Its members use local resources with due diligence and meet other cultures with respect.

www.forumandersreisen.de

Gebeco

Gesellschaft für internationale Begegnung und Kooperation

Since 1978 **Gebeco**, the Society for International Encounters and Cooperation, stands for responsible tourism, with the maxim of treating local hosts in a fair manner and with respect. Today, Gebeco is the biggest Tourcert CSR certified tour operator in Germany.

www.gebeco.de

HAMBURGER STIFTUNG FÜR WIRTSCHAFTSETHIK

The **Hamburg Foundation for Business Ethics** develops and funds projects dealing with ethical issues, values and value conflicts. It regards value-based conduct as an expression of entrepreneurial responsibility towards human beings, environment and society.

www.stiftung-wirtschaftsethik.de



Hauser Exkursionen

The focus of the hiking, trekking and mountaineering tours offered by **Hauser Exkursionen** is on global sustainability. Founded in 1973, the company is leading the market in the German-language area with over 700 routes. Hauser Exkursionen is a forum anders reisen member and CSR certified.

www.hauser-exkursionen.de



kate

Umwelt & Entwicklung

kate ecology and development works as a non-profit consultancy and educational organisation for sustainable economic management. kate assists organisations and companies in sustainable management and develops operational models for more corporate responsibility and global justice.

www.kate-stuttgart.org



KUONI

As a leading global travel-related service and destination management provider, **Kuoni** is active in 100 countries on five continents. Alfred Kuoni, who as a visionary adventurer and discoverer opened some of the first travel agencies in Europe, founded it in 1906 in Switzerland.

www.kuoni.com



ONE WORLD. Genussvoll. Nachhaltig. Authentisch. Aktiv. Der Spezial-Reiseveranstalter für besondere Erlebnis-Studienreisen in Afrika, Asien und Europa. In kleinen Gruppen mehr erleben. Durchführung schon ab 4 Gästen. Gründungsmitglied im forum anders reisen, CSR-zertifiziert.

www.reisenmitsinnen.de



EINE MARKE DER NATURFREUNDE INTERNATIONALE

The trademark **respect** represents the voice of **Naturefriends International (NFI)** for environmental and development issues in tourism. It promotes a sustainable tourism in all its dimensions – ecologically, socio-culturally and economically. **respect** provides information and educational work for travellers and the tourist industry.

www.nf-int.org | www.respect.at

Studiosus

Studiosus is Europe's leading provider for educational journeys. High quality programmes, outstanding tour guides and constant innovations guarantee Studiosus its leading position. Safe traveling and the concept of sustainability are moreover key components of the corporate philosophy.

www.studiosus.com | www.studiosus-foundation.org



TourCert
Gesellschaft für Zertifizierung im Tourismus

TourCert, the non-profit organisation for certification in tourism, awards the CSR label "CSR TOURISM certified" to tourism businesses. Companies must meet social and ecological requirements in their core business and will be reviewed by independent experts on a regular basis.

www.tourcert.org



TOURISM WATCH

As the development agency of the Protestant Churches in Germany **Bread for the World** campaigns with its desk **Tourism Watch** for sustainable, socially responsible and environment-friendly tourism.

www.brot-fuer-die-welt.de | www.tourism-watch.de



Viventura is Germany's leading South America expert and stands for sustainable and authentic South America tours. Viventura uses its non-profit association viSozial to support a variety of social and environmental projects.

www.viventura.com



ROUNDTABLE
Human Rights
in Tourism

The multi-stakeholder initiative *Roundtable Human Rights in Tourism* considers itself an open platform to advance human rights in tourism. It provides incentives for enterprises, organisations and institutions that are campaigning for the respect of human rights in tourism. Participation is open to all institutionalised actors who identify with the principles of the Roundtable.

The *Roundtable Human Rights in Tourism* aims at:

- Setting in motion a process of rights responsibility according to the *UN Guiding Principles on Business and Human Rights* (Ruggie 2011) and winning tour operators for compliance with human rights due diligence;
- Developing an industry standard as well as a management concept for human rights responsibility according to the *UN Guidelines on Business and Human Rights*, recommending them for the tourism industry and making them known;
- Implementing human rights standards into the business processes of tour operators by providing information and various materials, and advancing access to good practice with knowledge transfer;
- Raise awareness in the public and the media: bring travellers, businesses, investors, educators, students and responsible politicians to respect human rights in tourism.

More information at:

www.humanrights-in-tourism.net | info@humanrights-in-tourism.net

Member organisations of the *Roundtable Human Rights in Tourism*



Promoted/Funded by:  Austrian Development Cooperation

