SUMMARY REPORT

Evaluation of The Code of Conduct for the Protection of Children from Sexual Exploitation in Travel and Tourism

ECPAT

THE CODE .ORG

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EXECUTIVE SUMMARY

THE CODE

The Code of Conduct for the Protection of Children from Sexual Exploitation in Travel and Tourism (The Code) was originally developed by ECPAT Sweden in partnership with the United Nations World Tourism Organisation (UNWTO) - currently called UN Tourism - following the first World Congress Against Sexual Exploitation of Children in 1996[1]. Since 1998, The Code[2] has been implemented by numerous private sector entities around the world, and currently has 329 members in 42 countries, working closely with civil society organizations. The Code is currently managed by ECPAT International, with members representing a variety of businesses from the travel and tourism sector, including international and national hotel chains, individual hotels, travel and tour agencies and transport companies in both destination and sending countries. The Code is a global multi-stakeholder initiative and outlines six voluntary criteria that members commit to, in order to ensure the safety of children[3].

THE EVALUATION

The objective of the evaluation was to understand **the types of outcomes** that The Code had contributed to based on the example of the selected destination countries: the Dominican Republic and Colombia with a focus on **how** these outcomes had come about, **for whom and under what conditions**. The sending countries component of the evaluation in France, Germany and the Netherlands took an exploratory approach to understand how and why The Code is implemented differently across contexts of both domestic and international tourism, how LCRs navigate advocacy through national and international partnerships, and the shifting business trends that may affect the future of The Code.

For Colombia and The Dominican Republic, Realist Evaluation was chosen as the main approach, due to its ability to deeply explain how a complex intervention, such as The Code, interacts with and is affected by different contextual conditions, resulting in different outcomes for

1 https://thecode.org/about/

2 "The Code" refers to the The Code of Conduct for the Protection of Children from Sexual Exploitation in Travel and Tourism (which is an international initiative). Relevant national codes and laws that exist to regulate the protection of children from Sexual Exploitation in Travel and Tourism are referred to as "national legislation" in the report. For an overview of national codes of conduct and the international code, the Code of Conduct for the Protection of Children from Sexual Exploitation in Travel and Tourism (The Code) in the Americas, see: ECPAT International (2020) Codes of Conduct on Child Protection for the Travel and Tourism Industry in The Americas. Available at: https://ecpat.org/wp-content/uploads/2021/08/Overview-Code-of-conduct-Child-protection-in-travel-and-tourism-2020.pdf

3 The Code is managed by ECPAT International.

different groups. The main focus was on developing and refining causal pathways that explain outcomes for different stakeholder groups in specific national and subnational settings in the two case study countries.

Realist evaluation is a theory-driven approach that aims to identify the underlying generative mechanisms that drive outcomes by examining the interplay between context, intervention, mechanisms, and outcomes (CIMO). The approach assumes that different contexts may produce varying results based on how individuals or groups interact with interventions. By using theory to guide the evaluation process, realist evaluation provides more nuanced insights that unpack and explain the complexity of programs in ways that directly inform policy and practice. In this sense, realist evaluation is designed with the key stakeholders (making use of their own assumptions and theories) in order to support use of evaluation findings by them.

In line with this approach and following discussions with the evaluation steering committee, the following evaluation questions were developed.

What types of outcomes (within national and local actors) has The Code contributed to within the Dominican Republic, Colombia and the Netherlands (and specific contexts within)? How, for whom and under what conditions?

Sub questions:

1. What intermediate outcomes do the actions taken following successful implementation of The Code lead to? Are there any unexpected or negative outcomes?
2. What "follow-through" actions are taken by Code member employees and managers to ensure that implementation of The Code contributes to intended outcomes? What are the reasonings and motivations behind the actions of key actors (Code member staff)?
3. How does national capacity and commitment to the Code influence different outcomes?
4. How have diverse stakeholders worked together in different contexts, across sectors to enhance/complement their implementation of The Code? What outcomes has this led to?
5. How and why do tourists take action to support the implementation of the Code (e.g. requesting evidence of implementation, reporting potential cases, sharing information with others, supporting CSOs)?

FINDINGS IN RESPONSE TO THE EVALUATION QUESTIONS

1. What intermediate outcomes do the actions taken following successful implementation of The Code lead to? Are there any unexpected or negative outcomes?

Changed attitudes and reporting

We found that some employees had changed their perspective on, and attitudes towards SEC in travel and tourism as an issue in both Colombia and The Dominican Republic, leading to more empathy with survivors following their involvement in training or awareness raising sessions. In spite of some reluctance to link reporting to specific companies, we found several instances where member employees and informal sector workers had reported potential cases in their places of work or communities. Training for employees which was focused on developing human connections with survivors, motivated employees to shift attitudes and take actions such as reporting. Further, broadening the scope of LCR approaches to recognize the role of informal sector workers motivated these workers to identify and report cases.

Tourists who did report potential cases were then less likely to re-report due to being demotivated by a lack of evidence on cases being investigated. This same demotivation is affecting Code members who are unclear on what the impact of The Code is on child protection. In some cases, the implementation of procedures such as screening clients during check-in affected client relationships negatively.

Multisectoral partnerships and mobilisation of Code members

Different multi-sectoral partnerships have been developed in support of implementation of The Code and the prevention of SEC in travel and tourism, with differing results. In The Dominican Republic the establishment of an multi sectoral committee led to an increase in the investigation and prosecution of SEC in travel and tourism cases. In Germany and the Netherlands, The Code plays a role in supporting LCRs to convene working groups dedicated to prevention of, and response to SEC in travel and tourism, which has strengthened professional working relationships between LCRs and public and private sector stakeholders, and influenced the broader travel and tourism sector to focus on the importance of child protection as a key sustainability issue.

Local level authorities and private sector actors demonstrate willingness to talk about SEC in travel and tourism openly with companies and with LCRs, which was confirmed as an overall shift that had happened over time in Colombia and The Dominican Republic. In Colombia and The Dominican Republic Code members engaged in or initiated broader social initiatives in communities, such as offering training for young people, sponsoring local schools and providing donations and mentoring for survivors. In Colombia this was often facilitated by the LCR in

connection with their survivor support programmes. Hotel associations in Colombia and The Dominican Republic mobilised their members to sign up to The Code. In Colombia a hotel association provided funding for smaller hotels to become Code members.

2. What "follow-through" actions are taken by Code member employees and managers to ensure that implementation of The Code contributes to intended outcomes? What are the reasonings and motivations behind the actions of key actors?

Engagement with The Code

Managers in Colombia and The Dominican Republic took steps to provide more conducive working environments and support employees to report potential cases by establishing clear reporting routes and responsibilities and a supportive working atmosphere. In spite of this, several factors limited reporting, such as response times of police and authorities, lack of faith in police and authorities, fear of police complicity in SEC in travel and tourism and fear of falsely accusing clients.

Managers in Colombia and The Dominican Republic who were experienced and prepared to go "above and beyond" were more diligent in implementing the criteria of The Code and also became involved in additional initiatives, such as the mentoring programmes or providing donations for survivors.

Travel and Tourism businesses in the Netherlands and France were driven to engage in The Code through growing interest in sustainability within the sector, and from their client base. Businesses which had made The Code an essential part of their brand and company values were those whose client base was more interested in human rights, child protection, and sustainability, or where incidents of SEC held a higher risk of reputational damage compared to other hospitality venues. These tended to be niche tourism focused on smaller groups of travellers such as the luxury sector or the adventure and nature-oriented tour operators.

In Colombia, national legislation provided an incentive for companies to sign up to The Code as they saw it as a way of complying with legal requirements. The Code was used by LCRs in Colombia and The Dominican Republic as a tool for raising awareness and engaging with businesses about SEC in travel and tourism and their role in prevention. In this way, The Code is "a way in" and a platform for further engagement and collaboration.

While the EU Corporate Sustainability Due Diligence Directive (EU CS DDD) has highlighted the responsibility of partners throughout the supply chain to monitor and report on SEC in travel and tourism cases, the findings indicate that the EU CS DDD has put additional reporting requirements on the private sector, covering a wider variety of issues, which risks losing the specificity of implementation and reporting on SEC in travel and tourism.

LCR Capacity, Influencing and Advocacy

LCR capacity and influence affected advocacy outcomes, particularly at a national level. Providing direct assistance to survivors strengthened the legitimacy and authority of the LCR in Colombia. In the Dominican Republic the LCR was able to influence policy and practice at a local level, but this did not reach to national level influencing. Relationships of trust between Code members (managers) and LCR staff in Colombia and The Dominican Republic were an important factor in ensuring Code implementation and reporting of cases.

The Code provided important funding for the LCR in Colombia (through training fees and donations from members) and in The Netherlands and Germany (through government support to implement Code initiatives and training for Code and non-Code members interested in addressing SEC in travel and tourism).

3. How does national capacity and commitment to The Code influence different outcomes?

The lack of a national strategy on SEC in travel and tourism in the Dominican Republic means there are fewer opportunities to engage with national and local government on the issue, however this was also affected by the LCRs lack of influence and perceived legitimacy. The Dominican Republic's recent entry into GARA is a potential window of opportunity to strengthen policy and practice related to SEC in travel and tourism but has not, yet led to concrete action.

National commitment to addressing SEC in travel and tourism is likely affected by the role that tourism plays in the national economy. This is more significant in the Dominican Republic where there is a push to increase tourist arrivals significantly over the coming years. The existence of national legislation in Colombia, requiring any individual or business registered as a tourism provider to take action to prevent SEC appears to provide a conducive environment for Code promotion, however the legislation does not include actors outside of the traditional tourism supply chain, such as informal sector workers.

Slow or ineffective responses to cases reported was a factor that dissuaded staff from reporting in all countries. Lack of law enforcement capacity is a major limiting factor in both Colombia and The Dominican Republic, and the complexities of the justice system and data privacy sharing law limitations were a major factor affecting reporting in Germany and The Netherlands.

4. How have diverse stakeholders worked together in different contexts, across sectors to enhance/complement their implementation of The Code? What outcomes has this led to?

Multi-sector collaboration and active participation of public servants in joint awareness raising enhanced The Code in The Dominican Republic. This multi-sector collaboration took place in a context of the decline of the tourism industry in the north of the island, which motivated justice sector representatives, hotel associations and

police to take action to prevent SEC in travel and tourism. This led to more cases being reported and more joined up work between public sector workers to investigate cases. In locations where the LCR had less presence and fewer direct relationships with authorities (e.g. in Punta Cana) this was harder to achieve.

ECPAT Germany convened stakeholders across countries in person through destination workshops to ensure coordinated response, while Defence for Children NL is developing a multi-stakeholder multi-country 'barrier' model that will support coordinated implementation of prevention by key stakeholders. Both sending country LCRs act as knowledge and coordination hubs for businesses, tourists, justice authorities and destination country LCRs, and coordinate transnational reporting through the Don't Look Away campaign[4] and other child protection networks they are part of.

5. How and why do tourists take action to support the implementation of The Code (e.g. requesting evidence of implementation, reporting potential cases, sharing information with others, supporting CSOs)? (based on secondary data alone)

Code members are reluctant to share information about SEC in travel and tourism and The Code with tourists in-situ beyond general information or branded materials. This is due to their desire to protect the reputation of their business and destinations. While there is evidence from international initiatives such as the Don't Look Away Campaign that some tourists do report potential SEC cases, in Colombia and The Dominican Republic neither Code members nor LCRs saw tourists as "key players" in terms of reporting.

Tourists are less likely to report in countries they consider 'socially distant' from their own, due to racial and cultural biases. A lack of clarity on warning signs and difficulty in receiving feedback from law enforcement about reported cases can also discourage re-reporting by tourists. In some regions, SEC is seen and normalised as a means of livelihood and social mobility for children and their families. This complicates the concepts of responsibility and victimhood, making it harder for businesses and tourists from sending countries to take action against perpetrators. The notion that communities may be complicit in the exploitation further reduces the perceived responsibility of sending country businesses and tourists to intervene.

RECOMMENDATIONS

Strategic

- Expand guidance documents to outline how The Code aligns with or helps fulfil specific requirements of emerging sustainability compliance and due diligence legislation and initiatives.

4 https://dontlookaway.report/. See also ECPAT https://ecpat.org/story/is-child-protection-a-priority-for-international-travellers/

- Further explore different models of multistakeholder cooperation and risk of harm of different stakeholders addressing both potential risks and opportunities for prevention at different points in the perpetrator's travel continuum.

- Map existing and potential LCRs and categorise organisations according to levels of influence, legitimacy, types of expertise and network to identify opportunities for support and collaboration across geographies and sectors.

- Consider adapting the current structure of The Code to manage and support LCRs more closely at country level and to facilitate quality assurance.

- Continue engaging with strategic partners by identifying specific "windows of opportunity" nationally and internationally that may facilitate new advocacy dialogues around SEC in travel and tourism policy, for example GARA membership and emerging sustainability and due diligence initiatives such as the EU CSDDD.

Programmatic

- Revise and enforce minimum standards for Code related activities, including minimum standards on training content and duration (to be contextualised as necessary).

- Provide example tools for monitoring The Code implementation to LCRs, such as anonymous employee surveys to track actions taken following training.

- Continue to work together with LCRs and members to develop communication materials that focus on the positive contributions clients can make to keeping children safe, sharing example resources across the network.

- Continue to investigate new offending modalities and risks resulting from the evolving trends in travel and tourism, and include this analysis in training materials, policies and procedures for Code members.

- Document and share examples of ways that LCRs have diversified their funding for The Code.

- Step-up work with LCRs to carry out in depth analyses of SEC in travel and tourism in national and local contexts to better understand contextual factors and synergies between broader activities and The Code (including children and young people's perspectives).

- Ask Code members to provide more information (during annual reporting) on actions taken by employees following the implementation of policies and internal procedures.

ACRONYMS AND ABBREVIATIONS

CIENAVYT	Comisión Interinstitucional contra la Explotación Sexual Comercial en Niños, Niñas y Adolescentes en Viajes y Turismo
CIMO	Context, Intervention, Mechanism, Outcome
CSR	Corporate Social Responsibility
EU	European Union
EU CS DDD	EU Corporate Sustainability Due Diligence Directive
GARA	Grupo de Acción Regional de las Américas (in English: The Regional Action Group of the Americas for the prevention of sexual exploitation of children in travel and tourism
IDS	Institute for Development Studies
INGO	International Non-Governmental Organisation
LCR	Local Code Representative
MAIS	Movimiento Para el Autodesarrollo Internacional de la Solidaridad
MEL	Monitoring, Evaluation and Learning
SEC	Sexual Exploitation of Children
SECO	State Secretariat for Economic Affairs (Switzerland)
SRHR	Sexual and Reproductive Health Rights
UN	United Nations
UNICEF	United Nations Children's Fund

SUMMARY EVALUATION REPORT

SEXUAL EXPLOITATION OF CHILDREN IN THE CONTEXT OF TRAVEL AND TOURISM

Over the years the travel and tourism sector, as well as the ways in which offenders (domestic offenders or foreign travelling sex offenders) operate, have seen important changes[5]. There has been a surge in online booking platforms, bypassing traditional travel agents and most flights, accommodation and tours are now booked online lacking direct interaction with tourism staff. Short-term rentals facilitated by online platforms have become a preferred option for travellers, presenting regulation challenges for tourism authorities and opportunities for increased anonymity for offenders. The growth of community tourism has also opened up access to remote areas, including through voluntourism with children, putting travellers in direct and unregulated contact with communities.

While progress has been made at national and international levels in developing policies and legislation to promote and regulate business with regards to due diligence and ending the exploitation of children, frameworks differ widely between countries in terms of their scope, accompanying monitoring mechanisms and whether they are legally binding or voluntary. These developments present new challenges for The Code and efforts to evaluate its effectiveness to understand how it works, warranting greater consideration for new conditions that may be affecting how The Code is promoted and how member companies are supported to fulfil The Code's criteria. These new conditions cover a range of factors from offenders' modalities to private sector responsible business models and shifting policy landscapes. This evaluation is a first attempt to consider these conditions and circumstances in how we understand The Code to work in different contexts.

THE CODE

The Code of Conduct for the Protection of Children from Sexual Exploitation in Travel and Tourism (The Code) was originally developed by ECPAT Sweden in partnership with the United Nations World Tourism Organisation (UNWTO) - currently called UN Tourism

5 The use of online technologies to access purely online CSAM as well as to plan and book SEC activities abroad has been documented in recent years. For example, see: Koning, A., & Rijksen-van Dijke, L. (2017). Child sex tourists: A review of the literature on the characteristics, motives, and methods of (Dutch) transnational child sex offenders. El Tiempo (2024). Las poderosas mafias que controlan la explotación sexual de menores en Colombia. Accessed 8.4.2024.

- following the first World Congress Against Sexual Exploitation of Children in 1996[6]. Since 1998, The Code has been implemented by numerous private sector entities around the world, and currently has 329 members in 42 countries, working closely with civil society organizations. The Code is currently run by ECPAT International, with members representing a variety of different private sector entities from the travel and tourism sector, including international and national hotel chains, individual hotels, travel and tour agencies and transport companies.

01

Establish a policy and procedures

against the sexual exploitation of children

02

Train employees

in children's rights, the prevention of sexual exploitation and how to report suspected cases

03

Include a clause in contracts

through the value chain stating a common repudiation and zero tolerance policy of sexual exploitation of children

04

Provide information to travellers

on children's rights, the prevention of sexual exploitation of children and how to report suspected cases

05

Support, collaborate & engage stakeholders

in the prevention of sexual exploitation of children

06

Report annually

on implementation of the six criteria

Figure 1. The six criteria of The Code

In a number of sending and destination locations, local organisations, referred to as Local Code Representatives (LCRs) promote The Code and support its members to implement the criteria according to established guidelines[7]. In addition to these "core" activities, LCRs and other organisations supporting The Code engage in a range of "wrap-around" and "community-wide" activities that support and enhance the implementation of the criteria[8].

6 https://thecode.org/about/
7 Where there is no LCR, the ECPAT Secretariat supports the applications and membership process.
8 The first criteria of The Code also requires that members are in alignment with The Code Voluntourism Policy https://thecode.org/voluntourism/

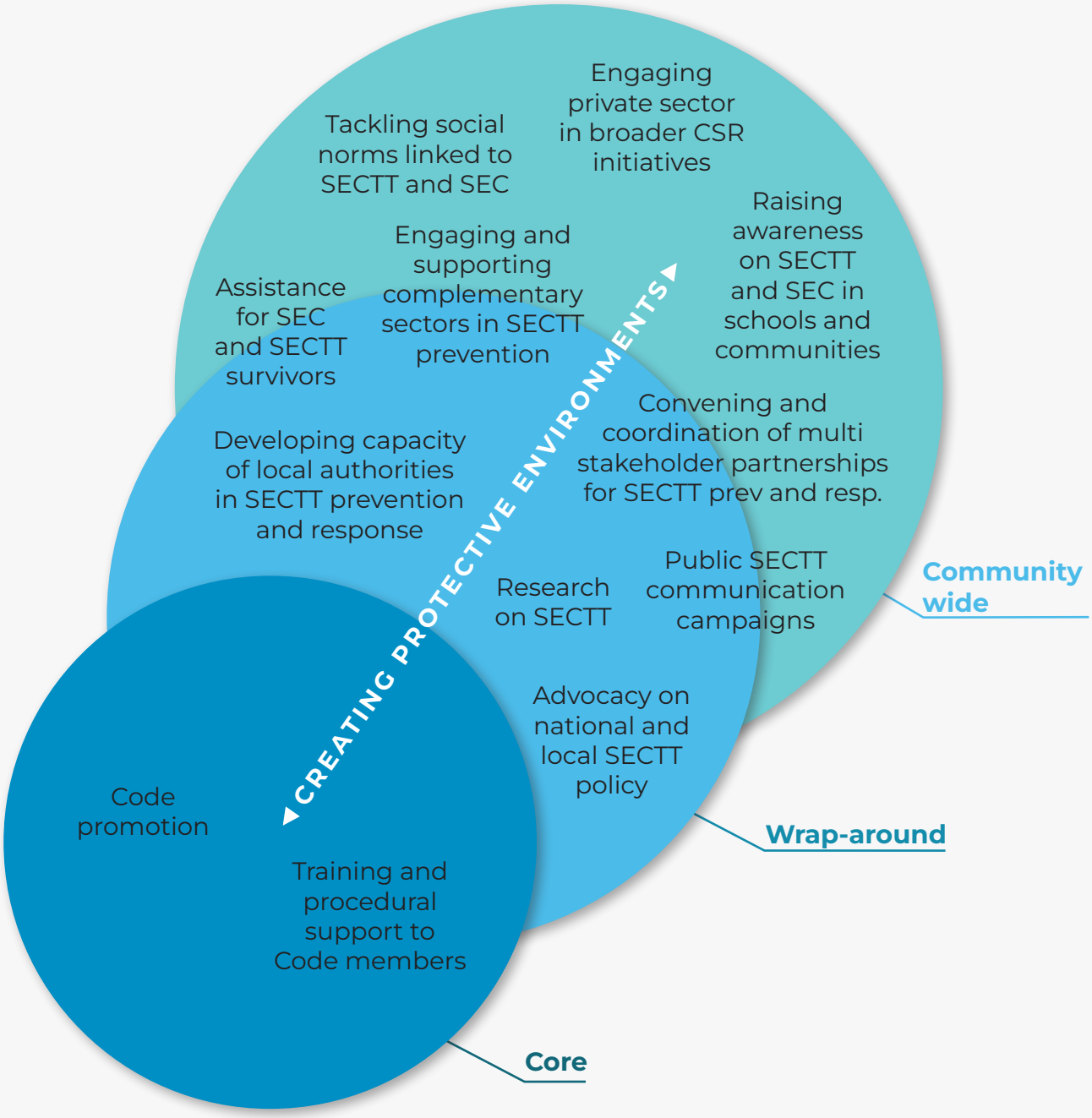


Figure 2. Core, Wrap-around and Community Wide Approaches

BACKGROUND TO THE EVALUATION

This evaluation focused on implementation of The Code in Colombia and The Dominican Republic as selected destination countries, as well as in France, Germany and the Netherlands as "sending" countries in the EU[9]. The evaluation builds on previous external evaluations and assessments of The Code, notably UNICEF's Innocenti Research

9 These countries are rerred to as sending countries due to the transnational travel of European residents to international destinations for vacations

Centre's 2012 assessment of The Code[10], the 2016 external evaluation of the SECO funded Protection of Children in Tourism programme[11], and case studies developed in 2024 by ECPAT International of The Code's implementation in Mexico and Colombia[12]. Findings from these studies have provided important insights as to challenges and promising practices in relation to The Code's promotion and implementation in several countries and globally, while also pointing to a lack of clear monitoring and evaluation systems and tools at country levels and therefore clear documentation of outcomes. The 2016 Global Study on Sexual Exploitation of Children (SEC) in Travel and Tourism also highlighted the need to generate knowledge through the investigation and documentation of promising experiences and lessons learned, in addition to the monitoring and evaluation of policies and programs to generate evidence on effective approaches[13].

THE EVALUATION APPROACH

A theory-based evaluation approach was selected for this evaluation to focus on **"how?"**, **"why?"**, and **"for whom?"** questions. Rather than looking at whether (or not) an intervention "works", theory-based evaluations consider multiple factors that may be at play when change happens. Their aim is to explain how interventions work rather than measure their effects. The main unit of analysis in all theory-based evaluation, therefore, is the theory (or theories) upon which interventions are based, both implicit and explicit. Specifically, a realist approach was chosen amongst multiple possible theory-based evaluation approaches because of its explicit inclusion of context in the way programme theories are developed.

In realist evaluations, contextual factors are an important part of building causal explanations[14]. Context in realist evaluations can include a range of characteristics that are not necessarily external to actors, such as level of education, social norms or legislation. Because mechanisms are sensitive to variations in context, identifying and including salient contextual factors helps to provide transferable findings. For this reason, we used a variety of methods and sources to ensure that we could generate findings that could provide a comparative perspective in relation to the way The Code works in different contexts.

The main units of analyses in this realist evaluation were the underlying mechanisms at play when The Code is promoted and implemented in different national and sub-national

10 Unicef Innocenti Research Center. *Assessing the Code of Conduct for the Protection of Children from Sexual Exploitation in Travel and Tourism – Discussion Paper.* 2012
11 Hummel, J., Kauffmann, A. (2016) *Institutionalizing The Code? Evaluation of: Protection of Children in Tourism, Phase II - Final Evaluation Report.*
12 ECPAT International, (2024). Estándares de Protección Para Las Niñas, Niños y Adolescentes en La Industria de Viajes Y Turismo: La Experiencia de México y Colombia.
13 Unicef (2016). *Government, civil society and private sector responses to the prevention of sexual exploitation of children in travel and tourism. A technical background document to the Global Study on Sexual Exploitation of Children in Travel and Tourism.*
14 Pawson, R. and Tilley, N. (1997) *Realistic Evaluation*. Sage.

settings and with different groups of actors. Mechanisms are a key focus of realist evaluations and provide important clues as to how and why different actors or groups interact with an intervention in a specific context to achieve certain outcomes. This approach can be summed up as answering the key question **"What works, how, for whom, and under what circumstances?**

Evaluation Steps

We developed an initial overarching theory of change for The Code, which was then broken down to develop nested actor-specific causal pathways to operationalise the realist evaluation approach to examine specific mechanisms related to key stakeholders engaging with The Code. We developed actor-specific causal pathways for tourism authorities, civil society organizations, private sector entities, employees, organised crime groups, tourists, and offenders.

We then identified "causal hotspots" within the actor pathways. These refer to segments of the causal pathway to examine in detail during the evaluation in order to better understand the core mechanisms at play. The hotspots were prioritised by the Evaluation Steering Committee based on the potential utilisation of findings, gaps in previous evaluations or studies and areas of interest for ECPAT International and Local Code Representative Organisations (LCRs) within and across the evaluation locations. The prioritised causal hotspots were:

1. Employees' responses to LCR training and supervision (by managers).
2. Local authorities' capacity, commitment and collaborations.
3. Private sector entity actions in support of ending SEC in travel and tourism.
4. LCR influence and brokering
5. Tourist engagement and reporting.

The actor pathways were refined in light of the evidence gathered during the evaluation and validated during sessions with LCR team members. These are presented in Annex 1.

Data Collection

We collected qualitative data through interviews with 32 people in total. Interviewees were NGO representatives, business managers, employees, and public sector workers. We also reviewed secondary data in the form of previous studies, LCR documentation and Code materials and resources related to promotion, guidance, risk analysis and policies. We carried out observations of Code member establishments and participatory network mapping sessions with LCRs.

Presentation of Findings

We present the analytical findings in this report structured around the causal pathways, the causal "hotspots" and the CIMOs that we developed for different stakeholder groups. We present findings for each pathway, as explanations for how the causal

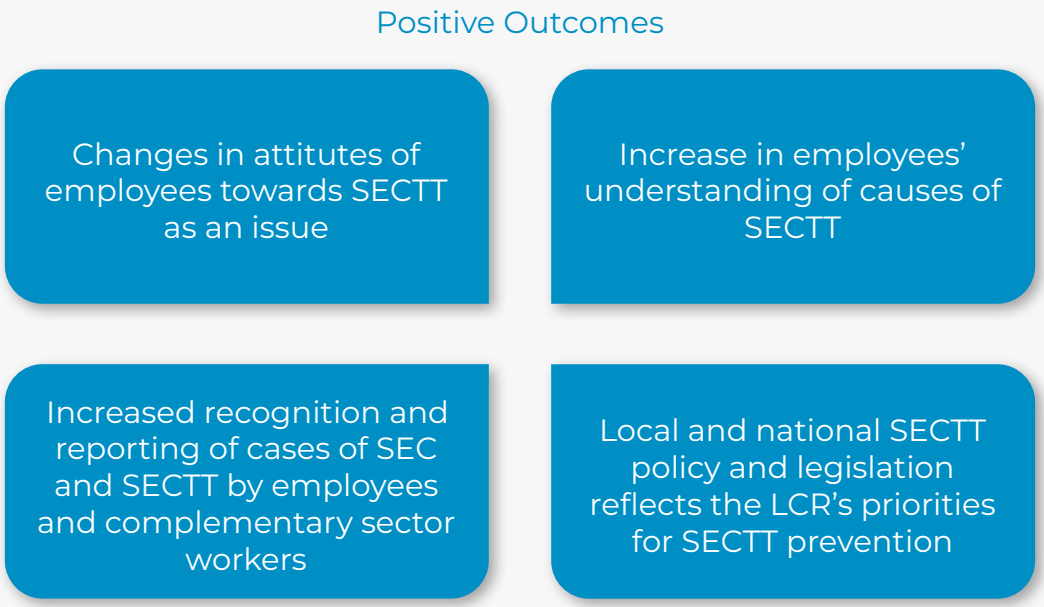
hotspots work within the pathways. The findings summarise the final CIMOs by showing how contextual factors interacted with specific elements or characteristics of the intervention to trigger mechanisms that resulted in outcomes. The revised overall causal pathways are presented in each of the findings sections in this summary report.

CASE STUDY SUMMARIES

Colombia

The LCR in Colombia, Fundación Renacer works with over 25 Code member companies in Colombia[15], the majority of which are hotels. A small number of bars, restaurants and tour operators are also Code members. Most Code members in Colombia are based in Cartagena, which is the main tourist destination.

Outcomes evidenced in Colombia were primarily related to **changes in employee attitudes towards SEC in the context of travel and tourism as an issue, understanding of the causes of SEC, recognition and** reporting of SEC cases by employees and complementary sector workers, **and local and national SEC in travel and tourism policy and legislation reflecting LCR priorities**. There was also some evidence that employees were **fearful of reporting potential cases** or were **frustrated by the response times of local authorities**, as well as **concerns on the part of businesses that they might be associated with SEC** or **concerns that reporting would damage their reputations**.



15 25 members were categorised as "active" in The Code database as of August 2024.

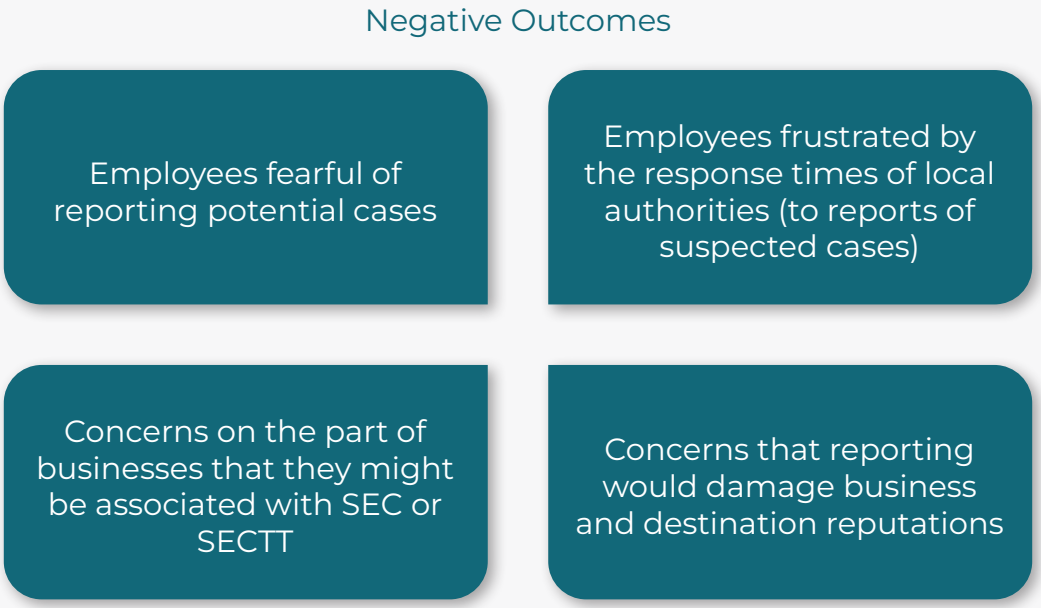


Figure 3. Summary Outcomes for Colombia

Findings on how Managers and Employees identify and report SEC cases through empathy and self-efficacy

We found that hotel and hospitality employees' family status was an important contextual factor influencing the way that they engaged with the training provided by the LCR in Colombia. The training primarily focused on survivors of SEC as vulnerable children with human stories who are being exploited by adults. Employees who were parents, or who felt responsible for younger siblings, nephews or nieces who participated in the training responded to the training by developing a sense of empathy with survivors and an increased sense of responsibility to their own family members as well as increased self-efficacy. This in turn led to a shift in attitudes towards survivors, where children were no longer blamed for getting themselves into situations of exploitation, and in some cases, concrete steps were taken in terms of reporting potential cases. We also found that participants gained a better appreciation of what constitutes exploitation and that employees who had participated in the training reported being more alert to potential situations or cases of exploitation at work, their own families and their communities.

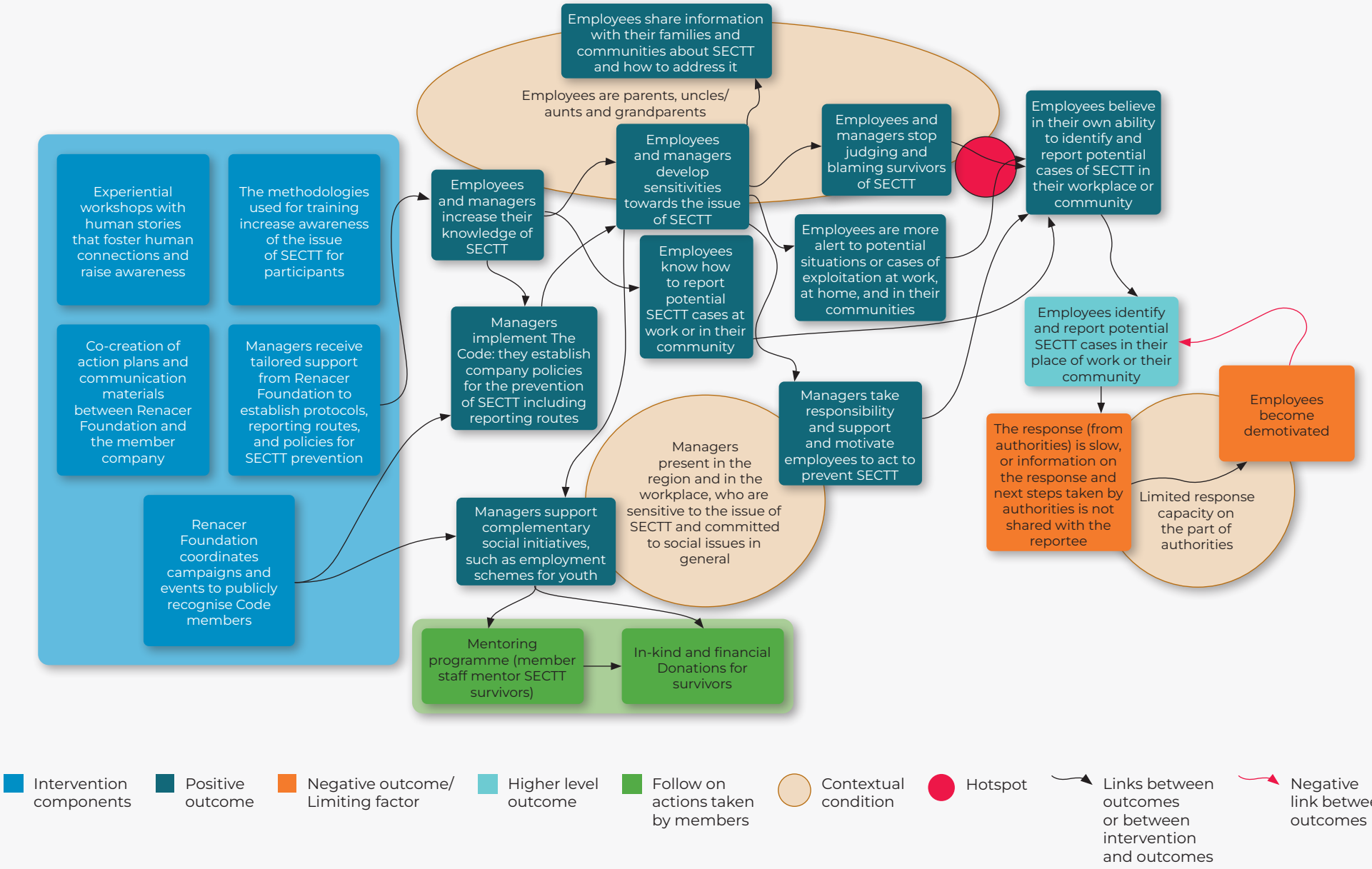


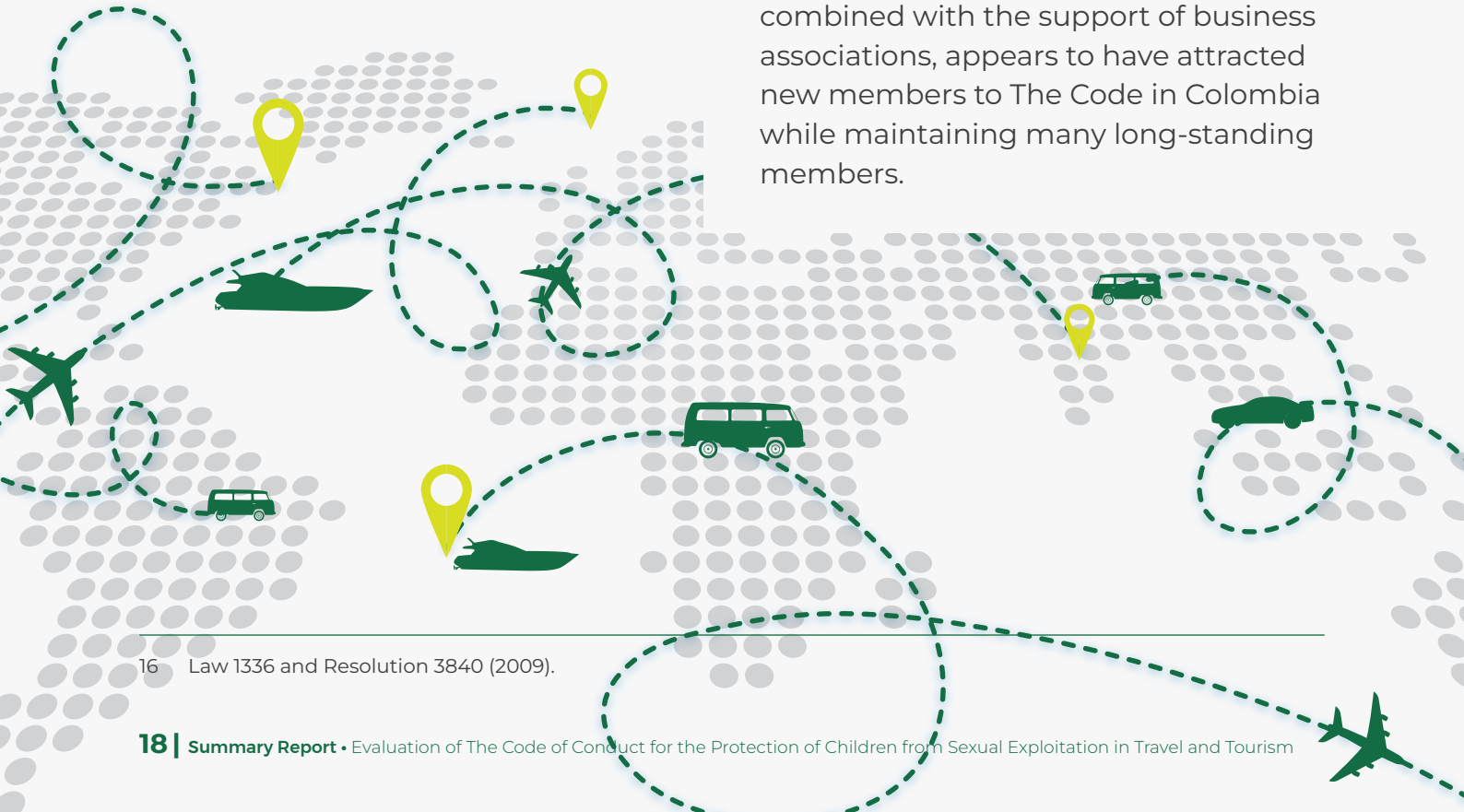
Figure 4. Employee and Manager Causal Pathway for Colombia

Findings on the Reluctance of Code Members to Addressing The Code and SEC in Travel and Tourism with Tourists

We found that business managers of Code members feel it is important to market their specific brands as well as their destinations as sustainable and responsible, however they also struggle with addressing the issue of SEC in travel and tourism directly with clients. There was a lack of visibility of the issue and The Code in business premises and while The Code is seen as a component of the wider sustainable and responsible approach, businesses are concerned about how broaching the issue might affect the reputation of the business and the experience of clients. These feelings of fear and reluctance are resulting in tourists' lack of awareness of SEC in travel and tourism as an issue, and their inability or unwillingness to recognise and report potential cases.

Findings on how Code Members Promote Membership in a Context of National Legislation

In Colombia, The Code exists as a voluntary initiative in addition to national legislation requiring private sector actors to take actions to prevent and respond to SEC in travel and tourism[16]. In this context, The Code has been promoted as a way to distinguish brands or business, as well as a way to access dedicated technical support from the LCR to improve practice, policies and procedures. Business managers in Colombia appeared to see added value in becoming Code members and The Code is also seen as a way to support compliance with national legislation. While some existing Code members seemed motivated by the appeal of a kind of exclusive "club" and the status of The Code as an international initiative, others were motivated to join The Code by their sense of individual and collective responsibility. This approach to membership promotion, combined with the support of business associations, appears to have attracted new members to The Code in Colombia while maintaining many long-standing members.



16 Law 1336 and Resolution 3840 (2009).

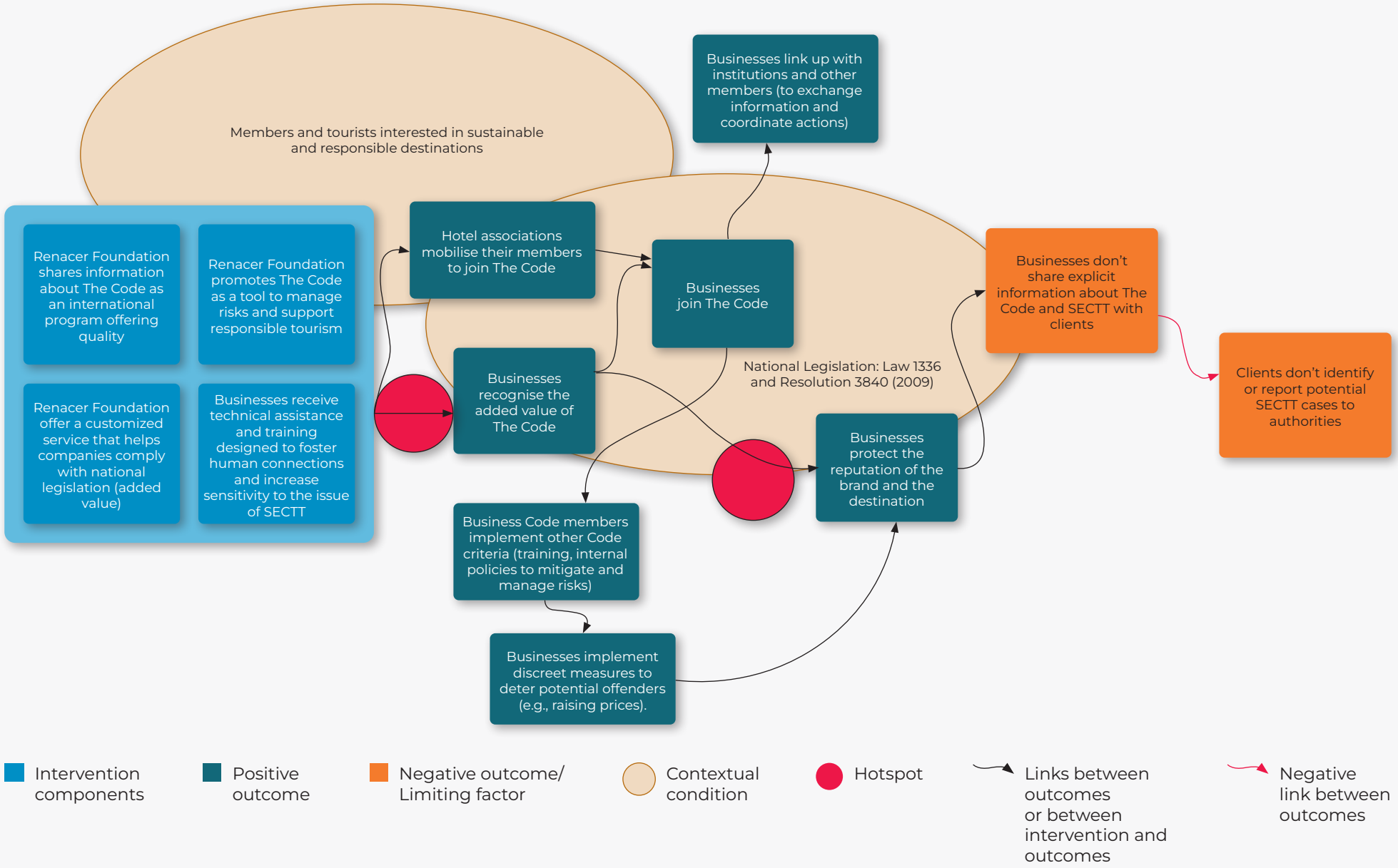
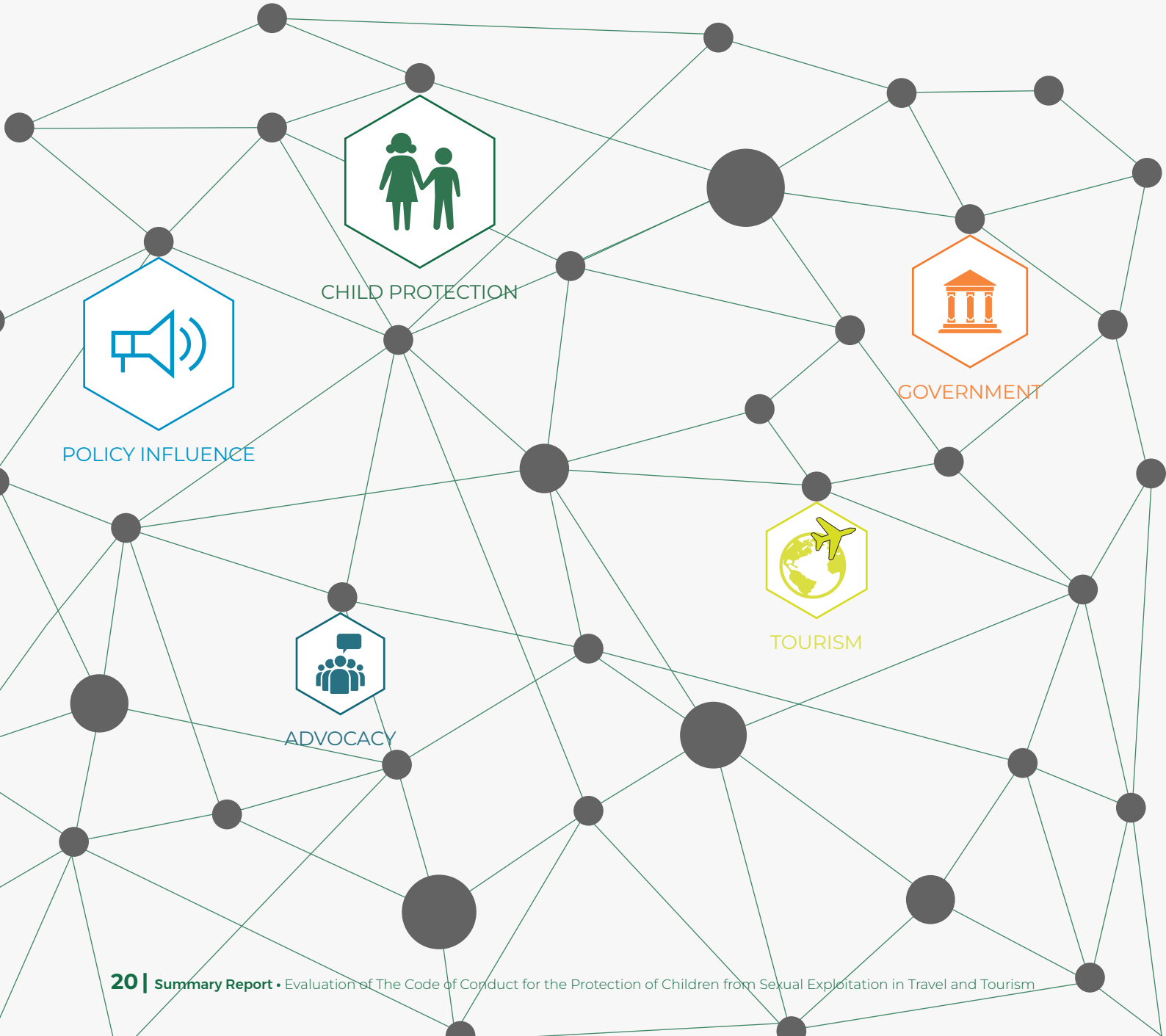


Figure 5. Business Causal Pathway for Colombia

Findings on how the LCR Influences Policy and Programmes through Evidence-based Advocacy

The LCR in Colombia works directly with survivors while also engaging in evidence-based advocacy and alliance building locally and nationally. We found that this approach, together with their broader national focus, provided a certain legitimacy in the eyes of decision makers when engaged on issues of SEC in travel and tourism policy and practice. Because the issue had been raised by an actor who is perceived as legitimate and representative of survivors, decision makers had been motivated to demonstrate greater social accountability as well as accountability to higher level government entities. In this sense, The LCR approach and level of influence significantly affects the potential for LCRs to exert pressure on authorities to improve or strengthen policies and practice aimed at reducing SEC in travel and tourism at local or national levels.



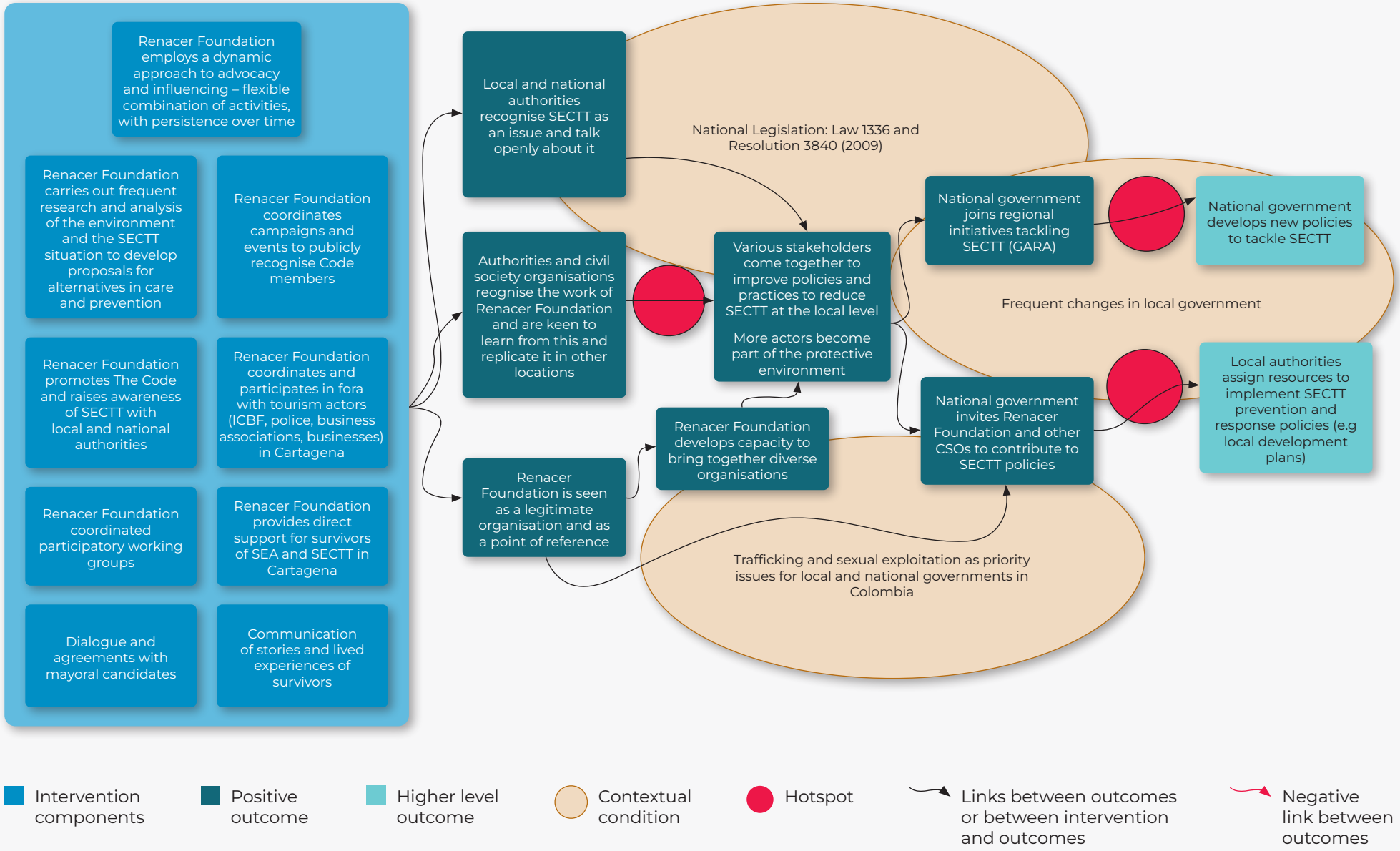


Figure 6. LCR Advocacy and Influencing Causal Pathway for Colombia

Findings on how to Mobilise Informal Sector Workers to Prevent SEC in Travel and Tourism

During data collection in Cartagena it became evident that informal sector workers played an important role in the LCR's efforts to tackle SEC in travel and tourism, an approach which directly complements The Code and work with Code members[17]. These workers provide tourist services but are generally not part of the formal supply chain[18]. Within the tourism sector, they may hire out sun loungers, sell island tours, food or jewellery, or provide hair braiding and massage services, with most of these services offered on beaches or at popular sightseeing spots. In some cases, informal sector workers are organized in associations or cooperatives, which may afford them improved working conditions and collective bargaining power in interactions with local authorities and formal businesses that may be competing for clients or territory. The LCR had actively engaged groups of informal sector workers, providing them with tailored training and recognition through formal qualifications. This meant that they developed a sense of pride and responsibility as well as a sense of self-efficacy and trust in the LCR, resulting in increased and improved actions taken to identify and report potential SEC cases in tourist locations and their own communities.

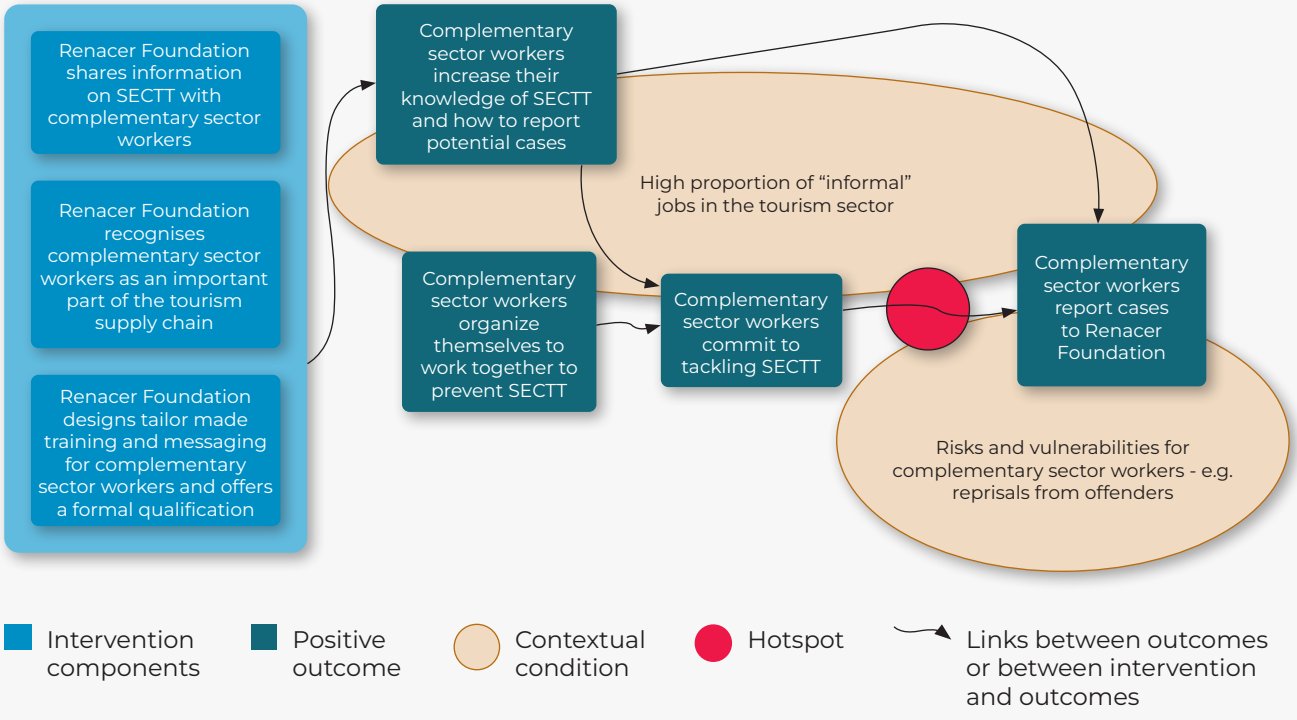


Figure 7. Informal Sector Worker Causal Pathway for Colombia

17 The term "complementary workers" is also used by LCRs to refer to this sector, which is recognised by several stakeholders as an important part of the tourism supply chain and the private sector in general. Criteria

18 Criteria 3 of The Code requires Code members to "Include a clause in contracts throughout the value chain stating a common repudiation and zero tolerance policy of sexual exploitation of children". In some cases, informal sector workers may be recommended by Code members as services providers or may have formal agreements with them, however in many cases, these workers act independently of formal establishments and so would not be covered by supplier contracts.

The Dominican Republic

Currently there are 30 active Code members in the Dominican Republic[19], the majority of which are located in two main tourist destinations, Punta Cana in the east of the island, and Puerto Plata in the north, with a small number located in the capital, Santo Domingo. Members on the whole are hotels or hotel chains, hotel associations and tour operators, although artisan cooperatives and taxi driver associations have also been members in the past. MAIS-ECPAT is the Local Code Representative and has been implementing activities in support of The Code since 2007. The organisation is based in Puerto Plata and focuses on providing training and procedural support to potential and existing Code members as well as raising awareness on SEC in travel and tourism prevention with educational institutions and local authorities.

The following outcomes were evidenced during data collection and analysis for the Dominican Republic.

Positive outcomes identified primarily related to **changes in employee attitudes towards SEC in travel and tourism** as an issue, **recognition and reporting of SEC cases** identified in places of work and communities, and the **development of intersectoral partnerships** in support of The Code and SEC in travel and tourism prevention and response more broadly. There was also some evidence that these partnerships had facilitated an **increase in the investigations and even prosecution of SEC in travel and tourism cases** in the Puerto Plata region of the Dominican Republic.

In terms of negative outcomes and limiting factors, there was some evidence that employees were **fearful of reporting potential cases**, as well as **concerns on the part of businesses that they might be associated with SEC** or **concerns that reporting would damage their reputations**.

Positive Outcomes

- Changes in employee attitudes towards SECTT as an issue
- Development of intersectoral partnerships in support of The Code and SECTT prevention
- Increased recognition and reporting of cases of SEC and SECTT by employees and cases identified in places of work and communities
- Increase in investigations and prosecution of SECTT cases

19 Code members with active membership as at August 2024.

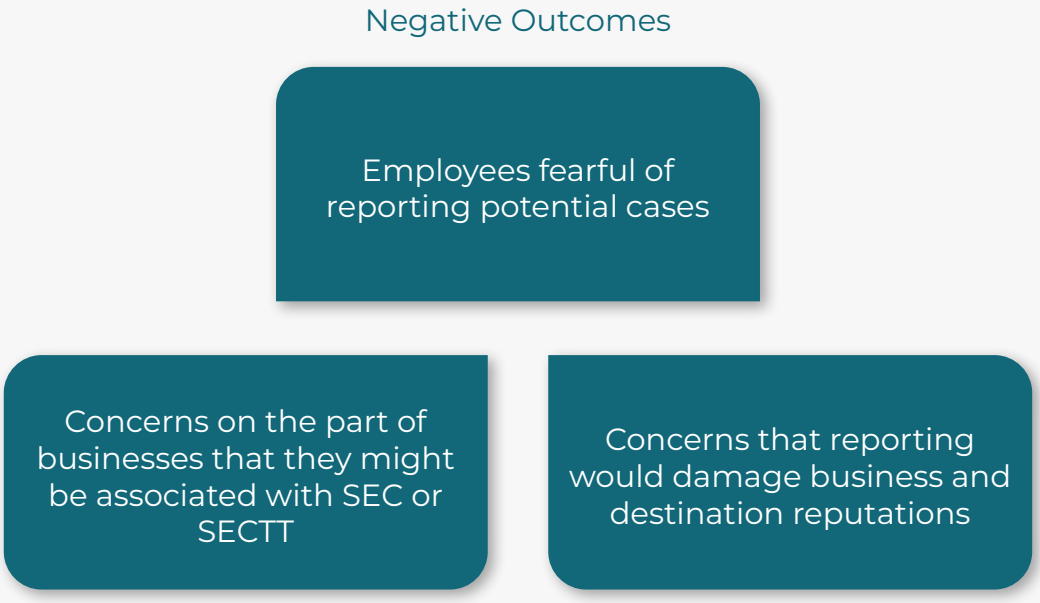


Figure 8. Summary Outcomes for The Dominican Republic

Findings on how Managers and Employees Change Attitudes and Identify and Report SEC in Travel and Tourism through Empathy and a Sense of Responsibility

The LCR described how they aimed to encourage reflection on SEC in travel and tourism by employees during awareness raising sessions by emphasising their roles in their own families as a way of helping them to connect with the issue. This appears to trigger mechanisms such as empathy and a sense of responsibility that support desired outcomes. Content for these sessions in the Dominican Republic was also focused at addressing commonly held beliefs that tend to portray survivors as willing participants and primarily motivated by economic opportunities[20]. LCR trainers described how these beliefs would often come up in discussions in training sessions, often (but not exclusively) expressed by younger participants. In response to this, MAIS emphasised a child's rights perspective and employees' connections to their own families.

As was the case in Colombia, we found that hotel and hospitality employees in The Dominican Republic who were parents or who felt responsible for younger siblings, nephews or nieces responded to the training by developing a sense of empathy with survivors of SEC and an increased sense of responsibility to their own Family members. This in turn led to a shift in attitudes towards survivors of SEC in travel and tourism, where children were no longer blamed for getting themselves into situations of exploitation, and in some cases,

20 The term "rebuscada" is often used to refer to girls or women in the Dominican Republic who are seeking to profit from others, via legal or illegal means. It also refers to someone who will go to any lengths to achieve what they want.

concrete steps were taken to report potential cases. In some cases, employees who had participated in the training reported being more alert to potential situations or cases of exploitation or abuse at work and at home.

Findings on how Managers and Employees Engage and Protect Younger Workers

We found that employee age affected the way that employees engage with The Code in the workplace. Training content was not always tailored to younger adult employees due to the focus on families and responsibilities for younger family members, leading to a lack of engagement with the issue of SEC in travel and tourism for some participants. Managers were concerned that a lack of experience was also a factor that contributed to a reluctance to report SEC in travel and tourism case reporting and that younger adult employees were also vulnerable to being exploited.

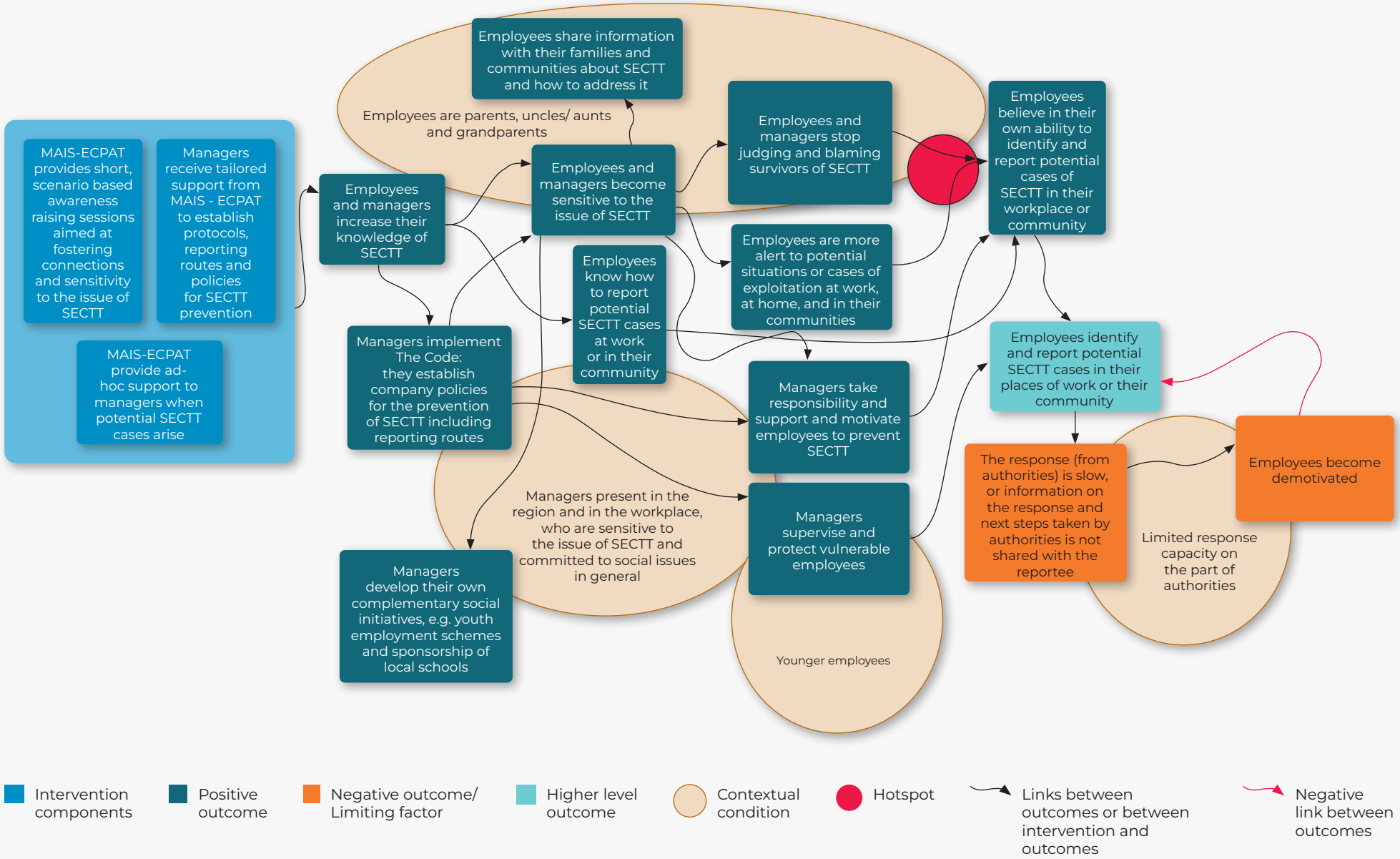


Figure 9. Employee and Manager Causal Pathway for The Dominican Republic

Findings on Code Members' Reluctance to Addressing The Code and SEC in Travel and Tourism with Tourists

Many business managers of Code members felt that it was important to market their specific brands as well as their destinations as sustainable and responsible**.** Some of these displayed The Code logo and some complementary information on their websites, in lobbies and information screens together with other sustainability initiatives, however in the venues visited, this information did not appear to be accompanied by specific information on children's rights, the prevention of sexual exploitation of children and how to report suspected cases, as is recommended in criteria 4 of The Code**.** The Code was seen as a component of this wider sustainable and responsible approach; however, businesses were generally reluctant to broach the issue of SEC in travel and tourism directly with clients due to fears about how this might affect the reputation of the business and the experience of clients. These feelings of fear and reluctance are likely to result in tourists' lack of awareness of SEC in travel and tourism as an issue, and their inability or unwillingness to recognise and report potential SEC in travel and tourism cases.

Findings on Business association' Capacity to Mobilise Members and other Joint Actions

Particularly active and supportive business association managers who were engaged by the LCRs to support Code promotion became champions of The Code, mobilising and engaging their own members to become Code members and to engage in joint actions. Business association managers felt a sense of responsibility to the tourism industry in their local areas as well as a personal commitment to the protection of children and young people. While it is not clear to what extent associations play a role in ensuring effective implementation of The Code criteria at the level of each business or private sector entity, they were able to provide examples of mobilising their members and facilitating joint actions, such as the CIENAVYT initiative in Puerto Plata (see below).

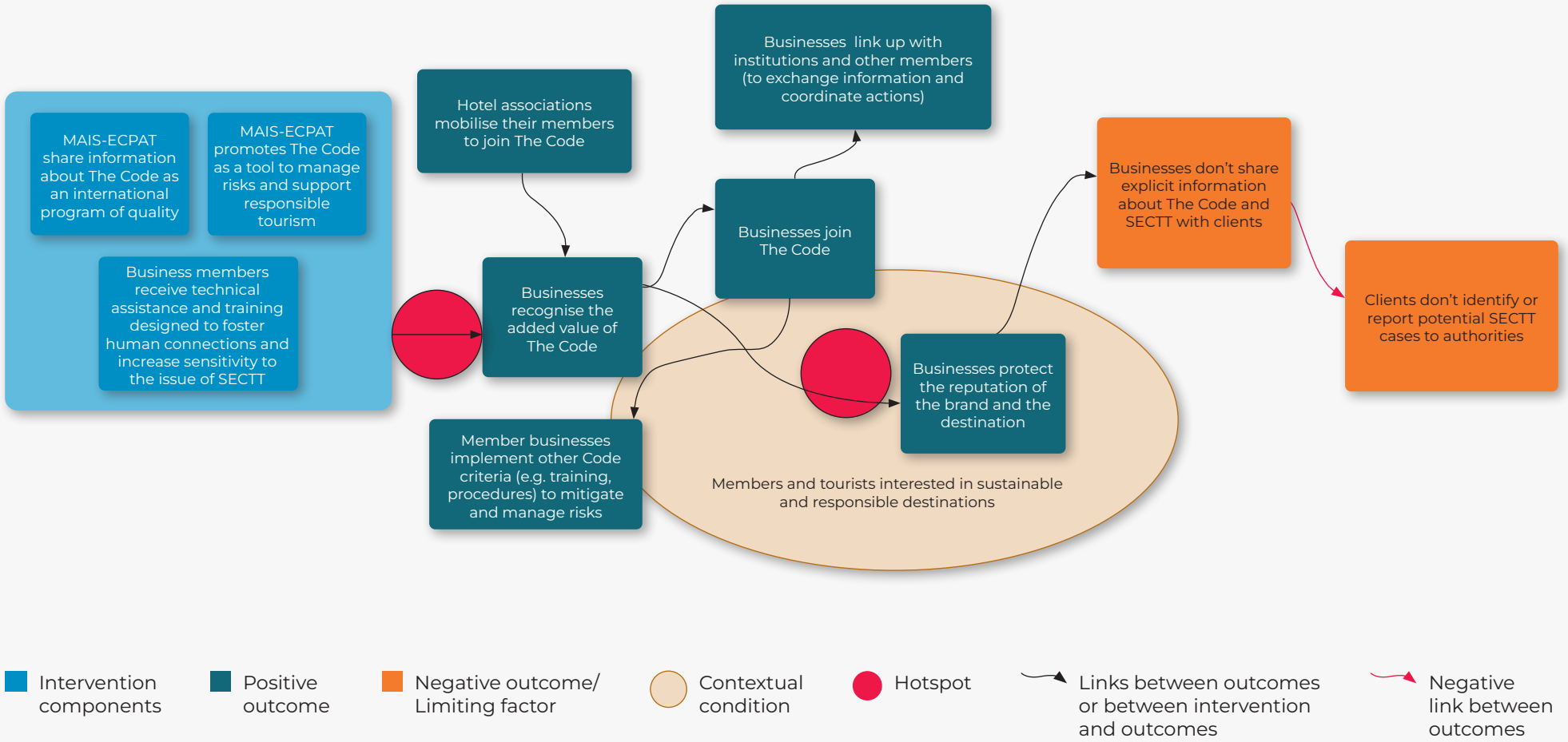


Figure 10. Business Causal Pathway for The Dominican Republic

Findings on Collaborative Action to Prevent and Respond to SEC through Multi-stakeholder Partnerships

Puerto Plata is recognised in The Dominican Republic as a tourism destination with a high incidence of SEC in travel and tourism and one that is often characterised as a "sex tourism"[21] destination by tourists and nationals. Several local actors reported that fewer tourists were now arriving in Puerto Plata compared to several decades ago, when the area was regarded as the main tourist destination in the Dominican Republic[22]. In this context, business managers and business associations have developed a collaborative structure to work together with other businesses, the justice sector, the tourism police, child welfare authorities, the local mayor's offices and educational institutions to prevent and respond to SEC in travel and tourism. This particular structure, named CIENVAYT[23], was instigated by private sector actors, with the support of the LCR and focuses on sharing information and alerts of potential cases and developing joint awareness raising sessions for hotel employees and other sectors such as taxi drivers or tour guides. According to local magistrates, this joint approach has resulted in more investigations of SEC in travel and tourism cases and even prosecutions. Members appear to have been motivated by fears and concerns about SEC in travel and tourism affecting children in their local area, as well as a broader concern about SEC in travel and tourism affecting the reputation of the destination, the tourism sector and the local economy in general.

21 The LCR addresses this frequently used term in training and encourages participants to question this characterization of destinations, maintaining the position that in no circumstances is it acceptable for the tourism sector to benefit from exploitation. ECPAT recommends using "Sexual Exploitation of Children in Travel and Tourism" rather than "Sex Tourism" to indicate that this is not a type of tourism, but a crime. See: Interagency Working Group on Sexual Exploitation of Children (2016). *Terminology Guidelines for the Protection of Children from Sexual Exploitation and Sexual Abuse*. ECPAT International.

22 Many of those interviewed perceived a direct link between the proliferation of what they described as "sex tourism" and the decline of the tourism sector in the north of the island which is regarded as less profitable and less popular than other destinations such as Punta Cana, in the east of the island. However, press reports suggest that there are additional factors such as a lack of foreign investment and fiscal incentives that may also have contributed to this decline. See for example https://www.tourinews.es/destinos-turismo/dominicana-puerto-plata-oscar-lora-caida-declive-turistas-reflexion_4472690_102.html and https://www.arecoa.com/hoteles/2023/07/13/alarma-hotelera-en-puerto-plata-por-caida-del-turismo-via-aerea/

23 CIENAVYT stands for *Comisión Interinstitucional Contra la Explotación de Niños, Niñas y Adolescentes en Viajes y Turismo* which translates as *The Interinstitutional Commision against the Exploitation of Boys, Girls and Adolescents in Travel and Tourism*.

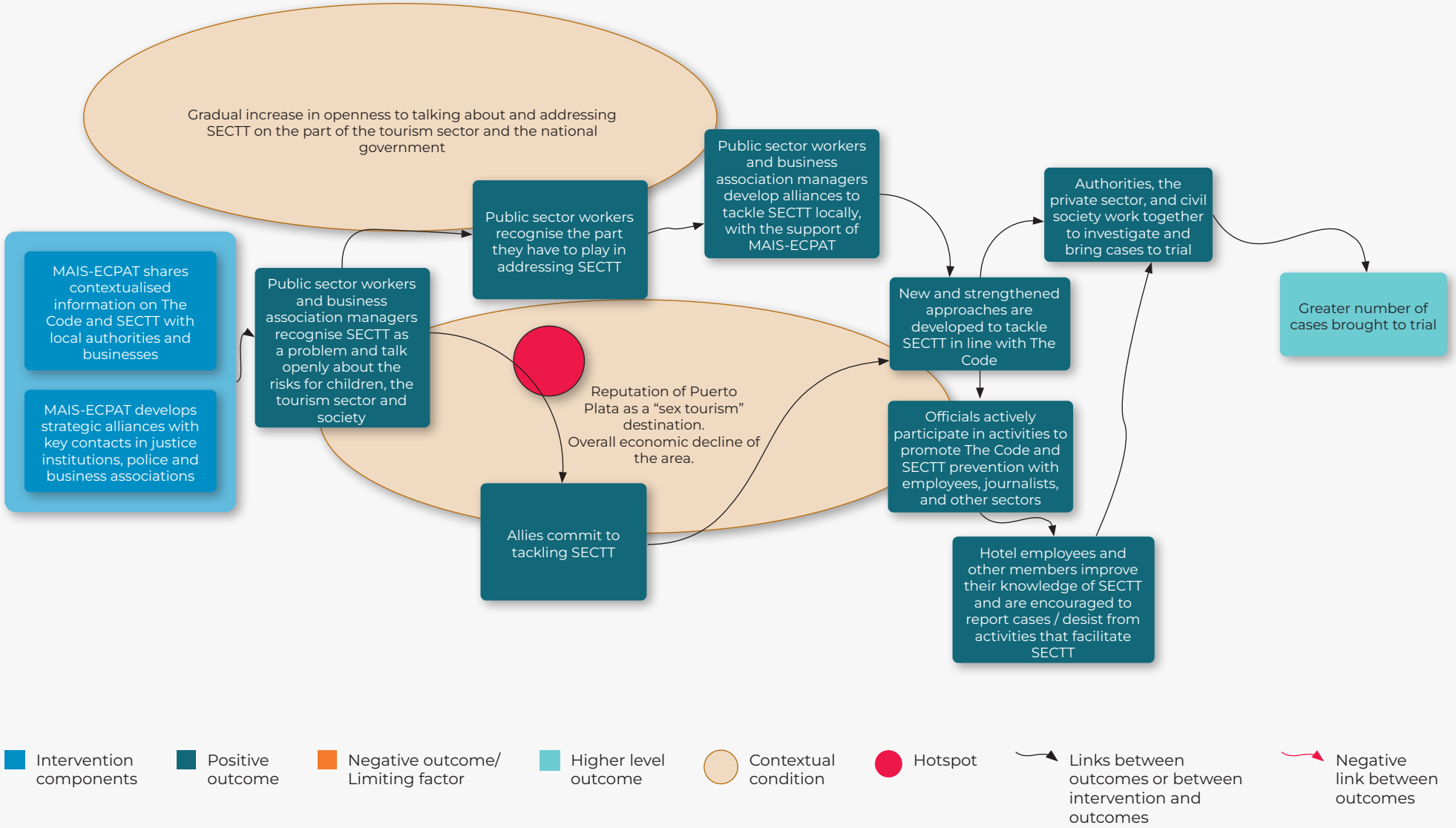


Figure 11. Multi-sector Partnerships Causal Pathway for The Dominican Republic

Findings on Obstacles faced by LCR in policy influencing

The LCR in the Dominican Republic struggled to influence decision makers beyond the local level and faced a less open context in terms of the willingness of the private sector and authorities to discuss the issue of SEC in travel and tourism. This lack of influence affected the ability of the LCR to influence authorities and decision makers to improve or strengthen policies and practice aimed at preventing and reducing SEC in travel and tourism at national levels. While the LCR recognises the importance of engaging with decision makers to influence national policy on SEC in travel and tourism, there have not been any significant achievements in the Dominican Republic in this area. However, the recent entry of the Dominican Republic into GARA and an apparent shift in attitudes to SEC in travel and tourism may provide an important window of opportunity in which to exert increased pressure on national authorities to develop favourable policies and programmes aimed at preventing and responding to SEC in travel and tourism.

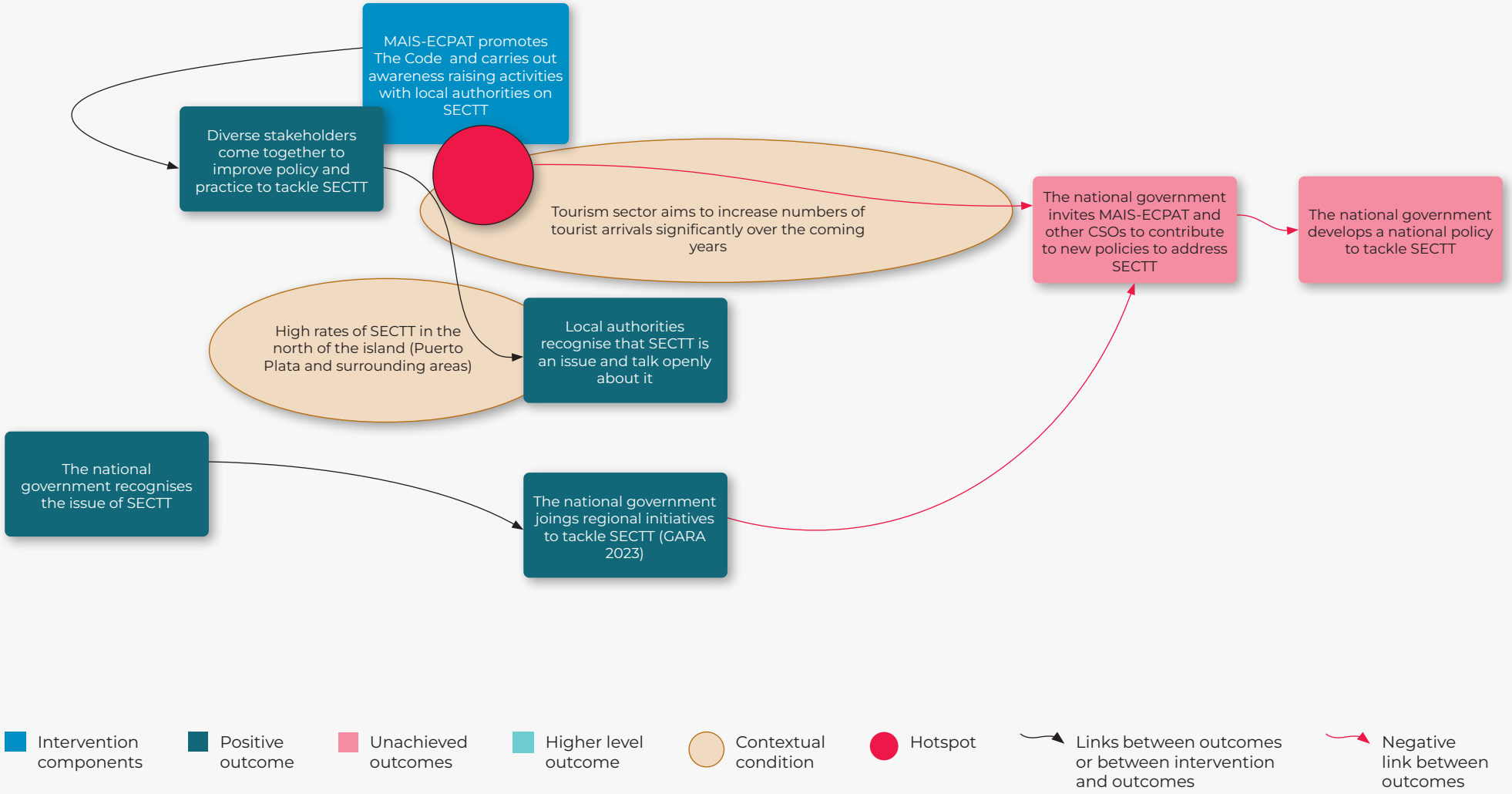


Figure 12. LCR Advocacy and Influencing Outcome Pathway for The Dominican Republic

SENDING COUNTRIES

This section examines the implementation of The Code in 'sending' countries, where tourists and potential transnational sex offenders originate. This exploratory component of the evaluation was based on interviews with LCRs from The Netherlands and Germany, Code members in The Netherlands and France, and criminology and forensic psychology experts but did not undergo a full realist evaluation.

Summary of LCR activities in two sending countries

Defence for Children - ECPAT Netherlands (DCI NL) works with 14 companies in The Netherlands, ranging from large hotel chains to smaller, sustainability-focused operators. It supports businesses with training, webinars, and individual assistance to implement The Code and report annually. DCI NL also participates in multi-sectoral working groups, including one focused on Dutch citizens traveling abroad to exploit children. These groups are developing a barrier model to identify and intervene at key stages in the perpetrator's actions. DCI NL trains tour guides and transport staff to recognise and report exploitation, aiming to expand reporting to customs and security personnel. Additionally, it manages the Don't Look Away website, which handles case reports and refers them to relevant authorities, with increasing reports of incidents involving Dutch citizens abroad.

ECPAT Germany works with 11 businesses, providing tailored support for implementing The Code. Like DCI NL, it offers training, annual reviews, and advocates for child protection in tourism through multi-sectoral working groups. ECPAT Germany has conducted workshops in destination countries, such as Sri Lanka, to improve coordination among stakeholders. It also promotes child protection education for hospitality students. ECPAT Germany handles all cases related to child sexual exploitation in Germany, receiving reports through various channels, with a notable percentage linked to incidents abroad.

Demand for Membership to The Code

Demand for The Code is driven by growing interest in human rights and sustainability in business, interest in investing in destinations for sector sustainability, and mitigating reputational risks. The Don't Look Away campaign[24], which encourages reporting of exploitation, is an entry point for private sector engagement. Legislation such as the EU Corporate Sustainability Due Diligence Directive (CSDDD) also motivates businesses to comply with human rights standards, positioning The Code as a practical tool for accountability. However, the focus on child sexual exploitation in The Code may limit its appeal to some businesses, as broader social and environmental governance initiatives become more prominent. In addition, there is a risk of a diluted implementation of The Code potentially affecting the actual impact of The Code,

24 https://dontlookaway.report/

similarly to 'greenwashing' initiatives. Larger companies, especially those with a global presence, are more engaged, as they benefit from stronger brand reputation and regulatory compliance. Smaller companies, particularly those catering to eco-conscious travellers, are also prominent members. However, businesses whose brand reputation has less emphasis on sustainability or child protection may join but implement The Code minimally.

Implementation of The Code for Businesses in Sending Countries

Businesses that implement The Code focus on awareness-raising through their websites and tour representatives. However, some businesses avoid publicising their child protection efforts to avoid the perception of high risks of exploitation in their destinations. Contract clauses with destination management companies (DMCs) often include child protection measures, but enforcement is typically seen as the responsibility of local actors rather than sending country LCRs or tour operators. Larger companies with direct management of hotels can enforce stricter child protection policies compared to tour operators or franchise operations, which have less control over implementation. In one example, a multinational hotel chain integrates The Code into its operations with tailored training, audit systems, and organisation wide recognition for effective implementation.

Motivation of the Private Sector in Sending Countries to Implement The Code

For companies engaged in The Code, involvement in multi-sectoral working groups and collaborations with LCRs are key motivators. These stakeholders view The Code as a platform for industry leadership and social responsibility. The LCRs provide significant support, such as advice during incidents and case follow-up through the Don't Look Away campaign. However, a lack of clear evidence from law enforcement regarding the effectiveness of reporting and the long timeframes for transnational cases discourage businesses from fully committing to The Code.

The Role of Tourists

Tourists are often encouraged to report suspected cases of sexual exploitation, with campaigns like Don't Look Away emphasising their role. However, views on tourists' responsibility are mixed, with some arguing that local communities and families should take the lead in identification and intervention. Research shows that tourists are more likely to report cases within their own country or cultures that share similar socio-demographic characteristics, suggesting racial and cultural biases influence tourists' willingness to act[25]. Furthermore, once tourists report an incident, the lack of feedback on outcomes due to the anonymous reporting mechanism and lack of reporting from law enforcement often discourages future reporting.

25 Koning, A. (2025). Public Perceptions of Child Sexual Exploitation Abroad: A Vignette Experiment on the Influence of Social Distance. Crime & Delinquency, 71(1), 197-221. https://doi.org/10.1177/00111287211064786

Children and Communities

In some regions, child sexual exploitation is seen and normalised as a means of livelihood and social mobility for children and their families. This complicates the concepts of responsibility and victimhood, making it harder for businesses and tourists from sending countries to take action against perpetrators. The notion that communities may be complicit in the exploitation further reduces the perceived responsibility of sending country businesses and tourists to intervene.

FINDINGS IN RESPONSE TO THE EVALUATION QUESTIONS

1. What intermediate outcomes do the actions taken following successful implementation of The Code lead to? Are there any unexpected or negative outcomes?

Changed attitudes and reporting

We found that some employees had changed their perspective on, and attitudes towards SEC in travel and tourism as an issue in both Colombia and The Dominican Republic, leading to more empathy with survivors following their involvement in training or awareness raising sessions. Despite some reluctance to link reporting to specific companies, we found several instances where member employees and informal sector workers had reported potential cases in their places of work or communities. Training for employees which was focused on developing human connections with survivors, motivated employees to shift attitudes and take actions such as reporting. Further, broadening the scope of LCR approaches to recognise the role of informal sector workers motivated these workers to identify and report cases.

Tourists who did report potential cases were then less likely to re-report due to being demotivated by a lack of evidence on cases being investigated. This same demotivation is affecting Code members who are unclear on what the impact of The Code is on child protection. In some cases, the implementation of procedures such as screening clients during check-in affected client relationships negatively.

Multisectoral partnerships and mobilisation of Code members

Different multi-sectoral partnerships have been developed in support of implementation of The Code and the prevention of SEC in travel and tourism, with differing results. In The Dominican Republic the establishment of an multi sectoral committee led to an increase in the investigation and prosecution of SEC in travel and tourism cases. In Germany and the Netherlands, The Code plays a role in supporting LCRs to convene working groups dedicated to prevention of, and response to SEC in travel and tourism, which has strengthened professional working relationships between LCRs and public and private sector stakeholders, and influenced the broader travel and tourism sector to focus on the importance of child protection as a key sustainability issue.

Local level authorities and private sector actors demonstrate willingness to talk about SEC in travel and tourism openly with companies and with LCRs, which was confirmed as an overall shift that had happened over time in Colombia and The Dominican Republic. In Colombia and The Dominican Republic, Code members engaged in or initiated broader social initiatives in communities, such as offering training for young people, sponsoring local schools and providing donations and mentoring for survivors. In Colombia this was often facilitated by the LCR in connection with their survivor support programmes. Hotel associations in Colombia and The Dominican Republic mobilised their members to sign up to The Code. In Colombia a hotel association provided funding for smaller hotels to become Code members.

2. What "follow-through" actions are taken by Code member employees and managers to ensure that implementation of The Code contributes to intended outcomes? What are the reasonings and motivations behind the actions of key actors?

Engagement with The Code

Managers in Colombia and The Dominican Republic took steps to provide more conducive working environments and support employees to report potential cases by establishing clear reporting routes and responsibilities and a supportive working atmosphere. In spite of this, several factors limited reporting, such as response times of police and authorities, lack of faith in police and authorities, fear of police complicity in SEC in travel and tourism, and fear of falsely accusing clients.

Managers in Colombia and The Dominican Republic who were experienced and prepared to go "above and beyond" were more diligent in implementing the criteria of The Code and also became involved in additional initiatives, such as the mentoring programmes or providing donations for survivors.

Travel and Tourism businesses in the Netherlands and France were driven to engage in The Code through growing interest in sustainability within the sector, and from their client base. Businesses which had made The Code an essential part of their brand and company values were those whose client base was more interested in human rights, child protection, and sustainability, or where incidents of SEC held a higher risk of reputational damage compared to other hospitality venues. These tended to be niche tourism focused on smaller groups of travellers such as the luxury sector or the adventure and nature-oriented tour operators.

In Colombia, national legislation provided an incentive for companies to sign up to The Code as they saw it as a way of complying with legal requirements. The Code was used by LCRs in Colombia and The Dominican Republic as a tool for raising awareness and engaging with businesses about SEC in travel and tourism and their role in prevention. In this way, The Code is "a way in" and a platform for further

engagement and collaboration. Environmental and social governance initiatives such as the EU Corporate Sustainability Due Diligence Directive (EU CS DDD) have highlighted the responsibility of partners throughout the supply chain to monitor and report on social issues and human rights which may include SEC in travel and tourism cases. The findings indicate that initiatives such as the EU CSDDD have put additional reporting requirements on the private sector, covering a wider variety of issues, which risks losing the specificity of implementation and reporting on SEC in travel and tourism.

LCR Capacity, Influencing and Advocacy

LCR capacity and influence affected advocacy outcomes, particularly at a national level. Providing direct assistance to survivors strengthened the legitimacy and authority of the LCR in Colombia. In the Dominican Republic the LCR was able to influence policy and practice at a local level, but this did not reach to national level influencing. Relationships of trust between Code members (managers) and LCR staff in Colombia and The Dominican Republic were an important factor in ensuring Code implementation and reporting of cases.

The Code provided important funding for the LCR in Colombia (through training fees and donations from members) and in The Netherlands and Germany (through government support to implement Code initiatives and training for Code and non-Code members interested in addressing SEC in travel and tourism).

3. How does national capacity and commitment to The Code influence different outcomes?

The lack of a national strategy on SEC in travel and tourism in the Dominican Republic means there are fewer opportunities to engage with national and local government on the issue, however this was also affected by the LCRs lack of influence and perceived legitimacy. The Dominican Republic's recent entry into GARA is a potential window of opportunity to strengthen policy and practice related to SEC in travel and tourism but has not yet led to concrete action.

National commitment to addressing SEC in travel and tourism is likely affected by the role that tourism plays in the national economy. This is more significant in the Dominican Republic where there is a push to increase tourist arrivals significantly over the coming years. The existence of national legislation in Colombia, requiring any individual or business registered as a tourism provider to take action to prevent SEC appears to provide a conducive environment for Code promotion, however the legislation does not include actors outside of the traditional tourism supply chain, such as informal sector workers.

Slow or ineffective responses to cases reported was a factor that dissuaded staff from reporting in all countries. Lack of law enforcement capacity is a major limiting factor in both Colombia and The Dominican Republic, and the complexities of the justice system and data privacy sharing law limitations were a major factor affecting reporting in Germany and The Netherlands.

4. How have diverse stakeholders worked together in different contexts, across sectors to enhance/complement their implementation of The Code? What outcomes has this led to?

Multi-sector collaboration and active participation of public servants in joint awareness raising enhanced The Code in The Dominican Republic. This multi-sector collaboration took place in a context of the decline of the tourism industry in the north of the island, which motivated justice sector representatives, hotel associations and police to take action to prevent SEC in travel and tourism. This led to more cases being reported and more joined up work between public sector workers to investigate cases. In locations where the LCR had less presence and fewer direct relationships with authorities (e.g. in Punta Cana) this was harder to achieve.

ECPAT Germany convened stakeholders across countries in person through destination workshops to ensure coordinated response, while Defence for Children NL is developing a multi-stakeholder multi-country 'barrier' model that will support coordinated implementation of prevention by key stakeholders. Both sending country LCRs act as knowledge and coordination hubs for businesses, tourists, justice authorities and destination country LCRs, and coordinate transnational reporting through initiatives such as the Don't Look Away campaign[26] and other child protection networks they are part of.

5. How and why do tourists take action to support the implementation of The Code (e.g. requesting evidence of implementation, reporting potential cases, sharing information with others, supporting CSOs)? (based on secondary data alone)

Code members are reluctant to share information about SEC in travel and tourism and The Code with tourists in-situ beyond general information or branded materials. This is due to their desire to protect the reputation of their business and destinations. While there is evidence from international initiatives such as the Don't Look Away Campaign that some tourists do report potential SEC cases, in Colombia and The Dominican Republic neither Code members nor LCRs saw tourists as "key players" in terms of reporting.

Tourists are less likely to report in countries they consider 'socially distant' from their own, due to racial and cultural biases. A lack of clarity on warning signs and difficulty in receiving feedback also discourage re-reporting by tourists. In some regions, SEC is seen as a means of livelihood and social mobility for children and their families. This complicates the concepts of responsibility and victimhood, which further reduces the perceived responsibility and motivation of sending country businesses and tourists to intervene.

26 https://dontlookaway.report/. See also ECPAT https://ecpat.org/story/is-child-protection-a-priority-for-international-travellers/

RECOMMENDATIONS

Strategic

- Expand guidance documents that outline how The Code aligns with or helps fulfil specific requirements of emerging sustainability compliance and due diligence legislation and initiatives.
- Further explore different models of multistakeholder cooperation and risk of harm of different stakeholders addressing both potential risks and opportunities for prevention at different points in the perpetrator's travel continuum.
- Map existing and potential LCRs and categorise organisations according to levels of influence, legitimacy, type of expertise and network to identify opportunities for support and collaboration across geographies and sectors.
- Consider adapting the current structure of The Code to manage and support LCRs more closely at country level and to facilitate quality assurance.
- Continue engaging with strategic partners by identifying specific "windows of opportunity" nationally and internationally that may facilitate new advocacy dialogues around SEC in travel and tourism policy, for example GARA membership and emerging sustainability and due diligence initiatives such as the EU CSDDD.

Programmatic

- Revise and enforce minimum standards for Code related activities, including minimum standards on training content and duration as relevant for different contexts.
- Provide example tools for monitoring The Code implementation to LCRs, such as anonymous employee surveys to track actions taken following training and emphasise the importance of case reporting.
- Continue to work together with LCRs and members to develop communication materials that focus on the positive contributions clients can make to keeping children safe, sharing example resources across the network.
- Continue to investigate new offending modalities and risks resulting from the evolving trends in travel and tourism, and include this analysis in training materials, policies and procedures for Code members.
- Document and share examples of ways that LCRs have diversified their funding for The Code.
- Work with LCRs to carry out in depth analyses of SEC in travel and tourism in national and local contexts to better understand contextual factors and synergies between broader activities and The Code (including children and young people's perspectives).
- Ask Code members to provide more information (during annual reporting) on actions taken by employees following the implementation of policies and procedures.

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