

# Human Rights Assessments in the Tourism Sector

*A data collection guide for  
practitioners*



INSTITUT FÜR  
NACHHALTIGEN  
TOURISMUS GMBH

HAMBURGER STIFTUNG FÜR  
WIRTSCHAFTSETHIK

twentyfifty®

## Human Rights Assessments in the Tourism Sector - A data collection guide for practitioners

---

### **Institut für nachhaltigen Tourismus GmbH / Institute for sustainable tourism (Inatour)**

The Institute for sustainable tourism (Inatour) is a consultancy and research lab with a special focus on sustainability in tourism. Located in Wernigerode at the Harz University of applied sciences, Inatour is providing customers with scientific support in the fields of hotel resource management, destination development, sustainable cruise ship management, supply chain organisation and human rights protection. More than ten years of experience in the tourism sector and a large industry network of tour operators, suppliers and non-governmental organizations, are the foundation of Inatour's proficiency and success.

**[www.inatour.de](http://www.inatour.de)**

### **Hamburger Stiftung für Wirtschaftsethik / Hamburg Foundation for Business Ethics**

The Hamburg Foundation for Business Ethics is a privately funded non-profit organization, focusing on ethical risk assessments along the supply chains of industries such as electro recycling, toys, textile, cacao, mining and tourism. The Foundation also develops impact tools to minimize some of the identified risks and instigate social change.

**[www.stiftung-wirtschaftsethik.de](http://www.stiftung-wirtschaftsethik.de)**

### **twentyfifty ltd.**

twentyfifty is a management consultancy that builds the capacity of companies to understand and address their impacts, enabling them to lead change that benefits business and society. twentyfifty has over a decade's experience of helping companies to put their commitments to respect human rights into practice and implement the UN Guiding Principles on Business and Human Rights.

**[www.twentyfifty.co.uk](http://www.twentyfifty.co.uk)**

### **Publisher:**

Institut für nachhaltigen Tourismus GmbH (Inatour)

### **Concept and Content:**

Larissa Dietrich, Madeleine Koalick and Matthias Leisinger | twentyfifty Ltd.

**Cover picture:** © Harald Zeiss, Inatour

**First published:** February 2017

## Table of Contents

---

|   |           |
|---|-----------|
| <b>About this guide .....</b>   | <b>4</b>  |
| <b>Choosing the assessment destination .....</b>  | <b>5</b>  |
| Country-based comparison of human rights risk levels .....  | 5         |
| Other considerations for prioritisation .....   | 6         |
| <b>Planning the data collection .....</b>   | <b>8</b>  |
| Preliminary identification of most important human rights topics.....   | 8         |
| National, regional or local baseline data .....   | 9         |
| Mapping the local value chain and potentially affected groups .....   | 11        |
| Practical considerations for the selection of hotels / suppliers and supply chains to be covered by assessment..... | 13        |
| <b>Data collection guidance .....</b>   | <b>14</b> |
| Interview sampling .....  | 14        |
| Data collection checklists .....  | 17        |
| 1. Employee rights and protection .....   | 17        |
| 2. Security / Safety of personnel and tourists .....  | 21        |
| 3. Customer protection and information .....  | 22        |
| 4. Impacts of suppliers, contractors and other business partners.....   | 23        |
| 5. Women's and children's rights and protection.....  | 24        |
| 6. Community impacts and engagement .....   | 26        |
| 7. Anti-corruption.....   | 29        |
| Considerations for data collection and evaluation .....   | 30        |
| <b>References for further reading .....</b>   | <b>31</b> |

## About this guide

---

To meet their responsibility to respect human rights as per the [United Nations \(UN\) Guiding Principles on Business and Human Rights](#), companies must proactively practise human rights due diligence and assess their impacts on people. A number of companies in the tourism sector have tested and used approaches to human rights impact assessments (HRIA) individually (e.g. [human rights impact assessments by Kuoni](#)) or in cooperation with others (e.g. [sector-wide impact assessment in Myanmar](#)).

So far, there is no agreed upon standard methodology for conducting such assessments. Human rights as a subject area do not allow for the same level of standardisation as in the environmental sphere because of the qualitative nature of human rights impacts and the high dependency on the specific local context. That said, to ensure that the data collected in the context of human rights impact assessments is comparable and the collection process follows accepted quality criteria, this guide aims to:

- provide guidance on data collection for practitioners conducting or evaluating human rights impact assessments in tourism destinations (e.g. companies, consultancies and NGOs); and
- support the collection of comparable data in the context of company-led human rights impact assessments.

Given the context-specific nature of human rights impacts, **the scope of this guide is limited to a typical human rights assessment in a tourism destination with beach hotels and excursions.** It is not a guide on how to conduct a full HRIA. It provides guidance on how to determine the assessment destination and prepare the in-country data collection process. This is followed by an overview of criteria for the collection of data in the context of human rights impact assessments covering the following impact areas:

- Employee rights and employee protection (especially for vulnerable groups)
- Security / Safety of personnel and tourists
- Customer protection (e.g. privacy)
- Impacts of suppliers, contractors and other business partners
- Women's and children's rights and protection
- Community impacts and engagement
- Anti-corruption

### 10 Key Quality Criteria for Human Rights Impact Assessments, Danish Institute for Human Rights, [Human Rights Impact Assessment Guidance and Toolbox](#)

#### Process

- Participation
- Non-discrimination
- Empowerment
- Transparency
- Accountability

#### Content

- Human rights standards as benchmark
- Full scope of impacts
- Assessing impact severity
- Impact mitigation measures correctly prioritised
- Access to remedy

Please note that the following information was compiled based on practical experience, expert resources and consultations with practitioners in the field of human rights impact assessments. It is aimed at HRIA practitioners and is not an academic study. It is not aligned with standards of scientific research.

## Choosing the assessment destination

Following a human rights approach, the decision where to conduct a human rights impact assessment should always be based on where the company perceives the greatest risk of having the most severe negative human rights impacts determined by the factors **scale, scope and irremediability**<sup>1</sup>. In practice, most companies will base their decision on a combination of high human rights risk levels and practical considerations such as the importance of the destination for the business or the company's local leverage.

### Country-based comparison of human rights risk levels

To determine and compare general country human rights risks levels of destination countries, companies can resort to publicly available resources (see table 1 below) or purchase access to specialized service providers' data banks (e.g. [Verisk Maplecroft](#)).

**Table 1** summarizes information on publicly available indices that can serve as a proxy for the general human rights risk at destination country level. It is recommended to use a combination of a minimum of 3 or preferably more of the indices below covering different human rights related risk factors, e.g. the *Global Rights Index* and the *Corruptions Perceptions Index* as a proxy for the implementation of civil, political and workers' rights and the *Human Development Index* as a proxy for the realization of economic and social rights. The indices can be translated into score bands of low, medium and high-risk categories. A combination of these risk categories can be used to rank tourism destination countries according to their general human rights risk profile. See **Table 2** for an implementation example. The broader the spectrum of human rights issues covered, the more balanced the overview of relevant risk factors, particularly when post-conflict countries<sup>2</sup> are amongst the analysed countries.

**Table 1: Overview of country-based indices covering selected human rights risk factors**

| Human rights related risk factors                           | Publicly available indices   | Description   |
|---|--|---|
| <b>A. Protection of civil liberties and workers' rights</b> | <ul style="list-style-type: none"> <li>• <a href="#">Global Rights Index</a>, International Trade Union Confederation</li> <li>• World Bank (<a href="#">indicators Voice &amp; Accountability</a>)</li> </ul> | <ul style="list-style-type: none"> <li>• Index looks at collective labour rights.</li> <li>• Can be used as a proxy for political participation and empowerment. Caveat: Last data gathered in 2014.</li> </ul>   |
| <b>B. Levels of poverty / economic and social rights</b>    | <ul style="list-style-type: none"> <li>• <a href="#">Human Development Index</a>, UN Development Programme</li> <li>• <a href="#">GINI index</a>, World Bank</li> </ul>  | <ul style="list-style-type: none"> <li>• Summary measure of average achievement in key dimensions of human development: enjoying a long and healthy life, education and having a decent standard of living. No measurement of inequality, empowerment, human security, etc.</li> <li>• Measures the level of income inequality within a country. Caveat: Latest available data is from 2014.</li> </ul> |
| <b>C. Corruption</b>  | <ul style="list-style-type: none"> <li>• <a href="#">Corruptions Perceptions Index</a>, Transparency International</li> </ul>  | <ul style="list-style-type: none"> <li>• Measures the perceived levels of public sector corruption; high levels of corruption often correlate with higher levels of human rights abuse and prevent effective access to remedy.</li> </ul>   |

<sup>1</sup> For further information on these criteria, refer to the [OHCHR, The corporate responsibility to respect human rights, Interpretative Guide](#), pages 19-20.

<sup>2</sup> See [Guidelines for the Implementation of human rights-related due diligence in fragile contexts](#) by the German Roundtable on Human Rights in Tourism from October 2016.

## Human Rights Assessments in the Tourism Sector - A data collection guide for practitioners

|  |   |  |
|--|---|--|
| <b>D. Crime and violence</b>                                     | <ul style="list-style-type: none"> <li>• Order and Security component of the <a href="#">Rule of Law Index</a>, World Justice Project</li> </ul>  | <ul style="list-style-type: none"> <li>• The Rule of Law index ranks 113 countries according to how the rule of law is experienced in practical, everyday situations by the general public worldwide. The Order and Security component measures crime, political violence and vigilante justice.</li> </ul>  |
| <b>E. Political instability or conflict</b>                      | <ul style="list-style-type: none"> <li>• <a href="#">Global Peace Index</a>, Institute for Economics and Peace</li> <li>• <a href="#">Conflict Barometer</a>, Heidelberg Institute for International Conflict Research</li> </ul> | <ul style="list-style-type: none"> <li>• Conflict puts a broad range of human rights at risk and indicates whether particular attention needs to be paid to security provision.</li> </ul>   |
| <b>F. Gender inequality / Children's rights</b>                  | <ul style="list-style-type: none"> <li>• <a href="#">Global Gender Gap</a>, World Economic Forum</li> <li>• <a href="#">Kid's Rights Index</a>, Kids Rights Foundation and Erasmus University Amsterdam</li> </ul>                | <ul style="list-style-type: none"> <li>• Ranks countries according to how well they are leveraging their female talent pool, based on economic, educational, health-based and political indicators.</li> <li>• Ranks countries according to how they adhere to and are equipped to improve children's rights based on UNICEF data and concluding observations of the UN Committee on the Rights of the Child.</li> </ul> |
| <b>G. Weak protection of migrants / risks for modern slavery</b> | <ul style="list-style-type: none"> <li>• <a href="#">Global Slavery Index</a> (focus on migrant workers), Walk Free Foundation</li> <li>• <a href="#">Trafficking in persons report</a>, US state department</li> </ul>           | <ul style="list-style-type: none"> <li>• Provides an indication of the prevalence of the worst forms of labour abuses.</li> <li>• Ranks government efforts to tackle slavery.</li> </ul>   |
| <b>H. Natural disasters</b>                                      | <ul style="list-style-type: none"> <li>• <a href="#">World Risk Index</a>, Bündnis Entwicklung Hilft &amp; United Nations University – Institute for Environment and Human Security</li> </ul>                                    | <ul style="list-style-type: none"> <li>• Indicates the risk of disaster in consequence of extreme natural events.</li> </ul>   |

### Other considerations for prioritisation

Other considerations that might guide the country selection process in addition to human rights risk concern the leverage of the company in the countries in question and the importance of the considered destinations to the business. The following criteria can be used as a proxy for leverage or business criticality<sup>3</sup>:

- Customer volumes
- Size of the local business (by number of employees or by turnover)
- Engagement and willingness of local management to review and improve their practice (e.g. existing understanding of and interest in corporate responsibility)

<sup>3</sup> To learn more about prioritization tools and how to use them, refer to Step 4, '[Prioritize your actions and agree next steps](#)' of the online platform, '[5 steps towards managing the human rights impacts of your business](#)'.



Human Rights Assessments in the Tourism Sector -  
A data collection guide for practitioners

**Table 2: Template for internal risk overview**

| Countries | OVERALL COUNTRY RISK | TI Corruption Perceptions Index 2016 CPI<br>Score: From 0 (highly corrupt) to 100 (low levels of corruption) | ITUC Global Rights Index 2016<br>Score: From 5+ (no guarantee of rights due to the breakdown of the rule of law) to 1 (irregular violation of right) | UN Human Development Index 2015<br>(based on 2014 values)<br>Value: The closer to 1.0, the higher the level of human development | World Economic Forum Gender Gap 2016<br>Score: Highest possible score is 1 (equality), lowest possible score is 0 (inequality) | Business criticality (company perspective) | Leverage (company perspective)          |
|-----------|----------------------|--|--|--|--|--|---|
| Chile     |                      | 66   | 3  | 0.832  | 0.699  | ▪ Low customer volumes                     | ▪ No local team, managed from Argentina |
| Egypt     |                      | 34   | 5  | 0.690  | 0.614  | ▪ Low customer volumes                     | ▪ Local management is engaged           |
| Malaysia  |                      | 49   | 4  | 0.779  | 0.666  | ▪ Increasing customer volumes              | ▪ Good contact to local management      |

## Planning the data collection

Once the destination country for the human rights impact assessment has been selected, further data must be gathered to prepare for the in-country research. This data often only relates to the country level and is only available retrospectively; analysing it can therefore not be a substitute for direct engagement with affected groups to assess the current situation and actual impacts.

### Preliminary identification of most important human rights topics

Performing desk research on the human rights situation in the country chosen for the assessment helps to identify major areas for potential human rights impacts and make sure the in-country research and stakeholder engagement focuses on these impact areas (e.g. through a specific focus on high-risk affected groups in the country context). Most reports and databases have not been designed for a business audience, so practitioners must interpret the information against the background of the company's specific business activities and relationships and how they could impact people. For example, if governmental authorities systemically discriminate against women or a minority, it is very likely these groups are also exposed to higher risks at the workplace or in local communities affected by a new hotel resort.

| Information collected through desktop research  | Information sources   |
|---|---|
| <b>Overview of the human rights situation in the country and its adherence to international commitments</b>   |   |
| <ul style="list-style-type: none"> <li><b>Signed/ratified international/regional human rights conventions</b></li> </ul>                                | <ul style="list-style-type: none"> <li>Office of the High Commissioner for Human Rights (OHCHR), <a href="#">country profiles / overview of human rights treaty ratifications</a></li> <li>International Labour Organization (ILO) <a href="#">Information System on International Labour Standards, country profiles</a> (overview of ratification status, examination of individual cases before ILO organs, and relevant state reports/survey responses)</li> </ul>  |
| <ul style="list-style-type: none"> <li><b>Significant gaps in the implementation of international human rights standards in national law</b></li> </ul> | <ul style="list-style-type: none"> <li>Human rights treaty bodies monitor states' implementation of the core international human rights treaties. The <a href="#">OHCHR treaty bodies database</a> provides access to country reports and recommendations issued by these treaty bodies</li> <li>See also ILO Information System on International Labour Standards, country profiles (above)</li> <li>Review most important national labour laws and how international standards are reflected in there</li> <li>The <a href="#">UN Expert Mechanism on the Rights of Indigenous Peoples</a> conducts studies and research on the rights of indigenous peoples and provides the UN treaty bodies with expert advice; each study includes submissions from governments and international and local NGOs on the national implementation of indigenous rights and ongoing cases</li> </ul> |
| <ul style="list-style-type: none"> <li><b>Overview of most vulnerable/disadvantaged groups in country/assessment region</b></li> </ul>                  | <ul style="list-style-type: none"> <li>The <a href="#">Danish Institute for Human Rights country guides</a> provide a good overview of major human rights issues and vulnerable / high risk groups in specific sectors</li> <li>The United States (US) state department publishes comprehensive <a href="#">annual reports on the human rights practices of all UN member states</a></li> <li>Civil society country reports and news, e.g. <ul style="list-style-type: none"> <li><a href="#">Amnesty International</a></li> <li><a href="#">Human Rights Watch</a></li> <li><a href="#">Minority Rights Group International</a></li> <li><a href="#">Survival international</a></li> </ul> </li> </ul>   |



## Human Rights Assessments in the Tourism Sector - A data collection guide for practitioners

|   |  |
|---|--|
|   | <ul style="list-style-type: none"> <li>○ <a href="#">National human rights institutions</a></li> <li>○ National / local NGOs</li> </ul>  |
| <ul style="list-style-type: none"> <li>• <b>History of local conflicts/political/social instability</b></li> </ul>  | <ul style="list-style-type: none"> <li>• The annual <a href="#">Global Peace Index report</a> contains short country descriptions explaining the country ranking and underlying factors</li> <li>• The <a href="#">Uppsala Conflict Data Program (UCDP)</a> provides a database of internal and external conflicts from 1946 to the present</li> <li>• US state department reports (see above)</li> </ul>  |
| <ul style="list-style-type: none"> <li>• <b>Where relevant, data on natural disasters/impacts of climate change on the country in question (e.g. droughts, rising sea level)</b></li> </ul>         | <ul style="list-style-type: none"> <li>• The <a href="#">World Risk Index</a> annual report provides detailed information on individual countries exposure and vulnerability to natural disaster / climate change</li> </ul>   |
| <b>An overview of human rights issues in the tourism sector in the country</b>  |  |
| <ul style="list-style-type: none"> <li>• <b>Development of tourism in the past and future trends, with a focus on the impact of tourism on local economic development</b></li> </ul>                | <ul style="list-style-type: none"> <li>• The World Tourism Organisation collects a range of <a href="#">country-specific data</a> (number of arrivals, overnight stays, departures) over time and monitors <a href="#">general and regional trends</a> in the international tourism industry</li> <li>• Information from development organisations working with tourism in certain countries (e.g. <a href="#">Overseas Development Institute report on impacts of tourism on local livelihoods in Namibia</a>, <a href="#">GIZ overview of tourism projects in the context of development cooperation from 2015</a>)</li> </ul> |
| <ul style="list-style-type: none"> <li>• <b>Relevant factors characterising the local tourism industry, such as seasonality or migrant labour / high water use in water scarce areas</b></li> </ul> | <ul style="list-style-type: none"> <li>• Information from NGOs (e.g. Tourism concern for <a href="#">country-specific ethical tourism topics</a>, fairunterwegs for <a href="#">general information on trends and developments related to ethical tourism</a> (in German only), Ecpat for inter alia <a href="#">country specific reports on the sexual exploitation of children</a>)</li> <li>• Local/international multi-stakeholder organizations specialised in the sector regularly publish reports on specific regions / topics (e.g. <a href="#">Roundtable on Human Rights and Tourism</a>)</li> </ul>                   |
| <ul style="list-style-type: none"> <li>• <b>Allegations against tourism companies in the country and their supply chains</b></li> </ul>   | <ul style="list-style-type: none"> <li>• The <a href="#">Business and Human Rights Resource Centre</a> gathers sector specific information on human rights related allegations, legal cases and company responses</li> </ul>   |
| <ul style="list-style-type: none"> <li>• <b>Existing / outstanding initiatives addressing social or human rights impacts of tourism</b></li> </ul>  | <ul style="list-style-type: none"> <li>• Information from national/regional sector bodies and (local) tourism associations</li> <li>• Information on existing local certification or audit reports where available (e.g. <a href="#">travel life hotel certification reports</a>)</li> </ul>   |

### National, regional or local baseline data

Reports by national, regional or local government or international organizations (e.g. surveys, assessments, census, impact evaluations) can provide a **preliminary set of baseline indicators** on the current realisation of basic human rights in specific assessment regions. This information can be used to inform the assessment team about certain risks and vulnerabilities and highlight what to take into consideration during the qualitative interviews with local stakeholders and affected groups (see data collection checklists further below). In the future, relevant data will also be collected to measure progress towards the realisation of the Sustainable Development Goals. This data, once available, can provide additional insights into most of the mentioned impact areas. In general, if no statistical data is available in a country, the bureaucratic capacity of this country is relatively low and this might be an indicator of an overall low law enforcement capacity.

## Human Rights Assessments in the Tourism Sector - A data collection guide for practitioners

| Baseline data   | Potential data sources  |
|---|---|
| <b>Employee rights and protection</b>   |   |
| <ul style="list-style-type: none"> <li>Labour force participation rate (men/women)</li> <li>Unemployment rate</li> <li>Working poverty rate</li> <li>Gender wage gap</li> <li>National minimum wage</li> <li>Voluntary and involuntary labour turnover in the tourism sector</li> </ul> | <ul style="list-style-type: none"> <li>ILO, <a href="#">ILOSTAT database, country profiles</a></li> <li>Ministry of Labour</li> <li>Local census / household data gathered by the national statistics office</li> </ul>   |
| <ul style="list-style-type: none"> <li>Average monthly earning / average living costs</li> </ul>  | <ul style="list-style-type: none"> <li>Audit reports / national statistics office / Ministry of Labour</li> </ul>   |
| <ul style="list-style-type: none"> <li>Documented evidence of discrimination, forced labour or child labour and regional distribution</li> </ul>  | <ul style="list-style-type: none"> <li><a href="#">ILO Child labour statistics</a></li> <li><a href="#">ILO Information System on International Labour Standards, country profiles</a> (with information on pending cases)</li> <li>Media and NGO reports</li> </ul>  |
| <ul style="list-style-type: none"> <li>Injury rates in tourism</li> </ul>   | <ul style="list-style-type: none"> <li>Audit reports / national statistics office / industry associations</li> </ul>  |
| <b>Security / Safety of personnel and tourists</b>  |   |
| <ul style="list-style-type: none"> <li>Regional crime statistics</li> <li>Homicide rates</li> </ul>   | <ul style="list-style-type: none"> <li>Local ministry for interior affairs / national security reports</li> <li><a href="#">Country specific data by the United Nations Office on Drugs and Crimes (UNODC)</a></li> <li><a href="#">Travel security alerts by the German Federal Foreign Office</a> (in German only)</li> </ul> |
| <ul style="list-style-type: none"> <li>Documented evidence of protests and assemblies that have been forcibly dispersed</li> </ul>  | <ul style="list-style-type: none"> <li>Media reports</li> </ul>   |
| <ul style="list-style-type: none"> <li>Documented evidence of terrorist attacks / threats / kidnappings</li> </ul>  | <ul style="list-style-type: none"> <li><a href="#">Global Terrorism Database</a></li> <li>Media reports</li> <li>National security reports / publications</li> </ul>  |
| <ul style="list-style-type: none"> <li>Evidence of unsafe conditions in hotels</li> </ul>   | <ul style="list-style-type: none"> <li>Written reviews on platforms such as booking.com or tripadvisor.com can include relevant info related to health and safety and other impacts on tourists</li> </ul>  |
| <b>Women's and children's rights and protection</b>   |   |
| <ul style="list-style-type: none"> <li>Maternal mortality rates</li> </ul>  | <ul style="list-style-type: none"> <li>World Health Organization (WHO) <a href="#">Global Health Observatory</a></li> <li><a href="#">World Bank data on cause of death, by communicable diseases and maternal, prenatal and nutrition conditions</a></li> </ul>  |
| <ul style="list-style-type: none"> <li>Diphtheria-tetanus-pertussis (DTP3) immunization coverage</li> <li>Under-five mortality rate</li> </ul>  | <ul style="list-style-type: none"> <li><a href="#">WHO Global Health Observatory</a></li> <li><a href="#">WHO Global Health Observatory</a></li> </ul>  |
| <ul style="list-style-type: none"> <li>Percentage of girls enrolled in schools (primary /secondary)</li> </ul>  | <ul style="list-style-type: none"> <li>World Bank School <a href="#">enrolment, primary and secondary (gross), gender parity index (GPI)</a> based on UNESCO data</li> <li>Ministry for Education</li> </ul>  |
| <ul style="list-style-type: none"> <li>Average literacy rate amongst women</li> </ul>   | <ul style="list-style-type: none"> <li>World Bank <a href="#">literacy rate, adult female (% of females ages 15 and above)</a> based on UNESCO data</li> </ul>  |
| <ul style="list-style-type: none"> <li>Prevalence of (child) sex work</li> </ul>  | <ul style="list-style-type: none"> <li><a href="#">Ecpat country specific reports on the sexual abuse of children</a></li> </ul>  |

## Human Rights Assessments in the Tourism Sector - A data collection guide for practitioners

|  |  |
|--|--|
| <ul style="list-style-type: none"> <li>• <b>Women's land rights</b></li> </ul>   | <ul style="list-style-type: none"> <li>• Food and Agricultural Organisation (<a href="#">FAO Gender and land rights database</a>) offers country profiles and gender and land related statistics</li> </ul>                                      |
| <ul style="list-style-type: none"> <li>• <b>Women's rights in law</b></li> </ul>   | <ul style="list-style-type: none"> <li>• <a href="#">Guardian women's rights country by country</a></li> </ul>   |
| <b>Community impacts and engagement</b>  |  |
| <ul style="list-style-type: none"> <li>• <b>Percentage of people living in poverty</b></li> <li>• <b>Percentage of people dependent on food aid / social security</b></li> </ul> | <ul style="list-style-type: none"> <li>• ILO, <a href="#">ILOSTAT database, country profiles</a></li> <li>• National ministries</li> </ul>   |
| <ul style="list-style-type: none"> <li>• <b>Illiteracy rates</b></li> </ul>  | <ul style="list-style-type: none"> <li>• World Bank <a href="#">Adult literacy rate, population 15+ years, both sexes (%)</a> based on UNESCO data</li> </ul>  |
| <ul style="list-style-type: none"> <li>• <b>Pupil teacher ratio</b></li> </ul>   | <ul style="list-style-type: none"> <li>• World Bank <a href="#">Pupil-teacher ratio in primary education (headcount basis)</a> based on UNESCO data</li> </ul>   |
| <ul style="list-style-type: none"> <li>• <b>Percentage of population employed / number of population seeking work</b></li> </ul>   | <ul style="list-style-type: none"> <li>• See under employee rights and protection</li> </ul>   |
| <ul style="list-style-type: none"> <li>• <b>Percentage of population with safe access to water</b></li> </ul>  | <ul style="list-style-type: none"> <li>• World Bank <a href="#">Improved water source (% of population with access)</a> based on WHO/UNICEF Joint Monitoring Programme for Water Supply and Sanitation (<a href="#">wssinfo.org</a>).</li> </ul> |
| <ul style="list-style-type: none"> <li>• <b>Average water consumption per person</b></li> </ul>  | <ul style="list-style-type: none"> <li>• Ministry of Agriculture / Environment or Health</li> </ul>  |
| <ul style="list-style-type: none"> <li>• <b>Cost of 20 litres of water as percentage of average household income</b></li> </ul>  | <ul style="list-style-type: none"> <li>• Ministry of Agriculture /Environment or Health</li> </ul>   |
| <ul style="list-style-type: none"> <li>• <b>Extent of internal displacement</b></li> </ul>   | <ul style="list-style-type: none"> <li>• Global Internal Displacement Database and Report by <a href="#">Internal Displacement Monitoring Center</a></li> </ul>  |
| <b>Anti-corruption</b>   |  |
| <ul style="list-style-type: none"> <li>• <b>Existence of local anti-corruption ombudsmen</b></li> </ul>  | <ul style="list-style-type: none"> <li>• <a href="#">Transparency International's local chapters</a></li> </ul>  |
| <ul style="list-style-type: none"> <li>• <b>Evidence of national / regional corruption scandals</b></li> </ul>   | <ul style="list-style-type: none"> <li>• Media reports</li> </ul>  |
| <ul style="list-style-type: none"> <li>• <b>Evidence of corruption related to local audit processes</b></li> </ul>   | <ul style="list-style-type: none"> <li>• Audit reports / company compliance system</li> </ul>  |

### Mapping the local value chain and potentially affected groups

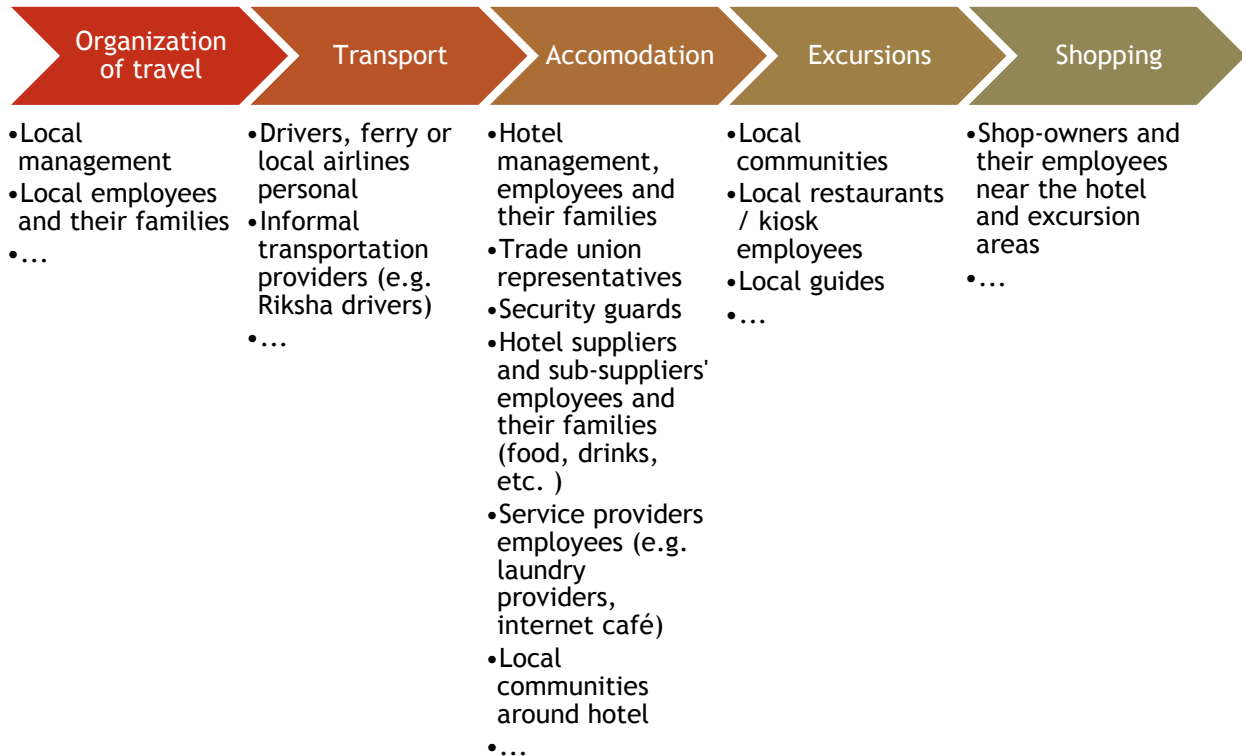
To get a better understanding of its (potentially) affected groups, the company undertaking a HRIA needs to obtain a simplified overview of its local value chain (see figure 1 below) including key business activities (e.g. hotels, excursions, conference management, tours) as well as key business relationships in the destination country (e.g. hotel suppliers, airlines, tour providers, other sub-contracted services). **Figure 1** below provides an overview of a simplified local value chain of a tour operator with local beach hotels and excursions. The specific components of the local value chain are highly dependent on the business model and local products of the company leading the assessment (e.g. trekking, ethnic tourism, cruise ships, outdoor sports) – this is hence a process every company should undertake individually.

Along the value chain, the key individuals and groups that can be directly or indirectly affected by the business activities and relationships (e.g. local management, own employees and their families, contract workers, trade unions, management and employees/ contractors/ day labourers of suppliers

## Human Rights Assessments in the Tourism Sector - A data collection guide for practitioners

and sub-suppliers, etc.) as well as their local representatives (e.g. civil society or community organizations) and local government representatives should be mapped. They are the key groups and individuals that need to be considered during the assessment.

**Figure 1: Simplified tourism value chain in tourism destination**



## Human Rights Assessments in the Tourism Sector - A data collection guide for practitioners

### Practical considerations for the selection of hotels / suppliers and supply chains to be covered by assessment

The number of (partner) hotels, suppliers and sub-suppliers that can be covered by a company-led human rights impact assessment depend on the available personnel and budget resources. Companies should adequately plan the use of their resources in consideration of the human rights context and risks in the country and the company's local product mix (see table below for an example limited to beach hotels and excursions). A greater diversity of products and local risk factors should result a greater number of assessed hotels and business partners.

| Criteria / Examples       | Local known human rights risk factors <sup>4</sup> (e.g. seasonality, migrant labour, near vulnerable communities, where armed security is used)  | Local product mix (e.g. exclusive hotels, beach hotel, hillside hotel, all-inclusive, hostels, resorts)   | Regional risk factors (e.g. conflict prone regions versus politically stable parts of the country, areas affected by natural disaster, region is known for child sex tourism) | Local high risk supply chains  | Selection  |
|---------------------------|---|---|---|--|--|
| <b>Dominican Republic</b> | <ul style="list-style-type: none"> <li>Known impacts of resort x on local communities and evidence of local protest</li> <li>Hotel x offers excursions with higher health and safety risks</li> </ul> | <ul style="list-style-type: none"> <li>100 % all inclusive</li> <li>x hotels with 10-50 employees, x hotels with 50-200 employees</li> <li>50 % of the hotels are exclusive (100% of guests from assessment company)</li> <li>20% are 5-star, 60% are 4-star and 20% are 3-star hotels</li> </ul> | <ul style="list-style-type: none"> <li>All hotels in politically stable areas</li> </ul>  | <ul style="list-style-type: none"> <li>E.g. Food / agricultural supply chains or furniture / deforestation and community displacement</li> </ul> | <b>Minimum:</b> <ul style="list-style-type: none"> <li>Hotel selection should reflect product mix, with a focus on high-risk hotels</li> <li>At least one supplier for each high-risk supply chain with a volume of spend above 10%</li> </ul>                                     |
| <b>Sri Lanka</b>          | <ul style="list-style-type: none"> <li>Known land rights issues related to hotels x,y,z</li> <li>Armed guards at hotels a,b,c</li> </ul>  | <ul style="list-style-type: none"> <li>70 % beach, 30 % hillside hotels</li> <li>x hotels with 10-50 employees, x hotels with 50-200 employees</li> <li>20% of the beachside hotels cover 80% of the local customers</li> </ul>   | <ul style="list-style-type: none"> <li>x hotels in post-conflict areas</li> <li>x hotels in areas affected by natural disaster</li> </ul>                                     | <ul style="list-style-type: none"> <li>E.g. Use of recruitment agencies / forced labour risks</li> </ul>   | <b>Advanced:</b> <ul style="list-style-type: none"> <li>Hotel selection should reflect product mix including different star rankings, human rights risk factors and regional criteria</li> <li>Deep-dive assessment of tier 2 and beyond for one high risk supply chain</li> </ul> |

<sup>4</sup> Again, this should consider the severity of the (potential) human rights impacts determined by their scale, scope and irremediability.

## Data collection guidance

---

Desktop analysis and in-country engagement with stakeholders and affected groups are the main data sources during a human rights impact assessment. The in-country engagement is essential for the company undertaking the assessment to understand how its activities and business relationships relate to its identified major human rights impact areas, how current management systems perform and what can be done to further mitigate or prevent actual or potential negative impacts at headquarter and local level.

### Engaging high-risk affected groups

Structural discrimination, marginalisation or vulnerability of specific high-risk groups identified during the desktop analysis (e.g. children, disabled people, indigenous people, migrant workers) will require the assessment team to take extra care to make sure their perspectives and voices are heard during the assessment process.

The conditions of the interview process (confidential, without management representatives present, if possible off-site, provision of assessors' contact details etc.) and the composition of the assessment team (e.g. language skills, mixed gender teams, cultural diversity) are critical in this context. It is highly recommended to consult expert publications such as the [HIRA Toolbox of the Danish Institute for Business and Human Rights](#) or the UNICEF guide '[Engaging stakeholders on children's rights](#)' and consult with local civil society organisations for further guidance on how to engage with specific high-risk groups.

## Interview sampling

The table below provides initial guidance for the sampling of key stakeholders and affected groups during the in-country engagement process (suppliers and business partners, hotel and supplier management and employees, local service provider employees and local communities).



## Human Rights Assessments in the Tourism Sector - A data collection guide for practitioners

| Stakeholder / affected group   | Qualitative considerations  | Quantitative considerations   |
|--|---|---|
| <b>Hotel and supplier employees (including trade union representatives and outsourced staff)</b><br><br><b>Note:</b> If possible, worker selection should be done by the assessor based on available documentation provided by the employer (payrolls, contracts, absence sheets, etc.) including information on the number and positions of outsourced staff (from partner hotel or local management) | <ul style="list-style-type: none"> <li>Assessors should make sure the interviewed workers represent the entire diversity of the workforce, including as a minimum:               <ul style="list-style-type: none"> <li>Different genders</li> <li>Different age groups</li> <li>Worker representatives</li> <li>New employees</li> <li>Workers of different pay grades including those from the lowest paid jobs</li> <li>Workers with different contracts (seasonal, short-term, long-term)</li> <li>Workers from different shifts / tasks including both front and back office (front desk, gardeners, cleaners, cooks and kitchen aids, spa employees etc.)</li> </ul> </li> <li>Where applicable, assessors should make sure the interviewed workers represent:               <ul style="list-style-type: none"> <li>Different ethnic, religious, linguistic, national, migrant groups</li> <li>Recent parents</li> <li>Seasonal workers</li> <li>Young workers</li> <li>Disabled workers</li> </ul> </li> <li>Assessors should conduct off-site / informal interviews with employees when interacting with them – many of them (e.g. gardeners, laundry staff, security staff, drivers, tea ladies) might be outsourced and have no contracts etc.</li> </ul> | <ul style="list-style-type: none"> <li>At a minimum, 5% of the overall workforce should be interviewed – 10% of the overall workforce would be desirable, particularly if a review of the employer documentation reveals a very diverse workforce</li> <li>As much as possible, assessors should make sure the sample of the interviewees is proportionate to the overall composition of the workforce</li> <li>At least 50 % of the selected workers should be interviewed individually, the remaining can be interviewed in group interviews</li> </ul> |
| <b>Local communities including community organizations / human rights defenders</b><br><br><b>Note:</b> It is highly recommended to cooperate with local experts or civil society groups to reach out to local communities   | <ul style="list-style-type: none"> <li>Assessors should to the extent possible ensure that interviewed community representatives reflect the diversity of the local population, with a specific focus on high risk groups such as:               <ul style="list-style-type: none"> <li>Women and girls</li> <li>Children and young people</li> <li>Disabled people</li> <li>Elderly people</li> <li>Migrants and displaced persons</li> <li>Indigenous people</li> <li>Ethnic, religious, linguistic or national minorities</li> <li>Local human rights defenders</li> </ul> </li> </ul>   | <ul style="list-style-type: none"> <li>The quantitative extent of local community engagement depends on the specific human rights risks communities are facing around hotels or excursion destinations [e.g. related to land rights, local livelihood (fishing or cultivation of crops, water contamination or use, etc.), or heightened risks for (child) sex tourism]</li> <li>Assessors should make sure the composition of the interviewees is proportionate to the overall composition of the communities i.e. as based on</li> </ul>                |

## Human Rights Assessments in the Tourism Sector - A data collection guide for practitioners

---

|  |   |   |
|--|---|---|
|  | <ul style="list-style-type: none"><li>• Assessors should work with local NGOs to reach out to / learn about the specific challenges faced by LGBTI people / people living with HIV/Aids or other diseases (who might face risks of retaliation if speaking out in front of their communities)</li><li>• It is recommended to use focus groups or group interviews to understand the scope and breadth of community impacts, with different formats for different high risk groups (e.g. women and children)</li></ul> | available government data or data provided by civil society organisations or the community itself |
|--|---|---|

## Data collection checklists

The data collection checklists have been clustered around seven major human rights impact areas: Employee rights and employee protection (especially for vulnerable groups); security and safety of personnel and tourists, customer protection (e.g. privacy), impacts of suppliers, contractors and other business partners, women's and children's rights and protection, community impacts and engagement; and anti-corruption. The specific focus of the interviews should be adapted to the specific human rights risks identified before and during the engagement process.

### 1. Employee rights and protection

| Indicators for interview processes  |   |
|---|---|
| Topics  | Evidence related to <ul style="list-style-type: none"> <li>respecting human rights</li> <li>promoting/supporting human rights</li> </ul>  |
| <b>Structural indicators (government / civil society / development agencies / international organization / trade union representatives)</b> |   |
| <b>Cases / allegations involving company / partner hotels / suppliers</b>   | <ul style="list-style-type: none"> <li>Information on cases or patterns of employee rights violations in the tourism sector related to the company in question and business partners / suppliers</li> <li>Evidence of practice of pregnancy / health tests before hiring related to company in questions / business partners or suppliers</li> </ul>  |
| <b>High risk groups</b>   | <ul style="list-style-type: none"> <li>Information on patterns of vulnerability (building on those identified in desktop research)</li> </ul>   |
| <b>Government role</b>  | <ul style="list-style-type: none"> <li>Evidence of government restrictions on trade union rights in assessment regions</li> <li>Evidence of governmental labour inspections in assessment regions / at partner hotels / suppliers</li> <li>Evidence of government initiatives addressing employee rights in the tourism sector</li> </ul>   |
| <b>Living wages</b>   | <ul style="list-style-type: none"> <li>Requirements for a local living wage in comparison to national / sector-wide minimum wages</li> </ul>  |
| <b>Grievance mechanisms</b>   | <ul style="list-style-type: none"> <li>Evidence of existing grievance mechanisms in the tourism industry</li> </ul>   |
| <b>Management practice (management documentation and interviews with local management, partner hotel or supplier management)</b>            |   |
| <b>Policy</b>   | <ul style="list-style-type: none"> <li>Information on available policies / handbooks / Standard Operating Procedures / guidance covering employee rights</li> <li>Information on distribution / communication of policy commitment to employees</li> <li>Information on monitoring of implementation and whether contract workers / informal workers on premises are covered by policy</li> </ul> |

## Human Rights Assessments in the Tourism Sector - A data collection guide for practitioners

|   |   |
|---|---|
| <b>Workforce / young workers</b>  | <ul style="list-style-type: none"> <li>• Information on workforce composition, e.g. percentage of young and child workers (as defined by ILO standards), persons with family responsibilities, migrant workers, people with disability, minorities, contract workers, etc.</li> <li>• Percentage and background (gender, migrant workers, etc.) of employees with long-, short-term or seasonal contracts</li> </ul>  |
| <b>Recruitment / contracts / performance management / dismissal</b>           | <ul style="list-style-type: none"> <li>• Information required from workers (e.g. health checks) during recruitment</li> <li>• Information on how recruitment staff is trained to avoid discrimination</li> <li>• Percentage of workers with a written contract</li> <li>• Information on how performance management is done</li> <li>• Information on surveillance measures used on site</li> <li>• Information on the management of lay-offs</li> <li>• Information on voluntary and involuntary labour turnover rates</li> <li>• Information on documents / records retained by company</li> </ul>  |
| <b>Forced labour / child labour / young workers</b>                           | <ul style="list-style-type: none"> <li>• Information on age determination processes and evidence of documentation requested from workers by company</li> <li>• Information on conditions for salary advances</li> <li>• Information as to whether deposits are required from workers</li> <li>• Information on restrictions on employees' freedom of movement</li> <li>• Evidence of monitoring, reporting or remediating cases when child workers were detected; general information approach to child labour remediation</li> <li>• Information on existence and conditions of apprenticeship programs</li> <li>• Information on specific precautions taken to protect young workers from hazardous work and support their access to education</li> </ul> |
| <b>Wage determination and living wages / social security / other benefits</b> | <ul style="list-style-type: none"> <li>• Information on how wages are determined and increased, wage records, overtime pay rates, existence of in-kind remuneration</li> <li>• Examples of wage calculation and pay check deductions available to workers, timing of payments</li> <li>• Information on contribution of the company to social security systems (when available)</li> <li>• Information if and how company checks local wages correspond to local living wage requirements</li> <li>• Information on housing or other benefits provided to employees (uniform, transport, payment of school fees)</li> </ul>   |
| <b>Working hours</b>  | <ul style="list-style-type: none"> <li>• Information on entitlement to paid holiday leave</li> <li>• Maximum working hours including overtime, average overtime, rest periods during the day / week</li> <li>• Information on existence of flexible working arrangements, provision of medical leave / time to care for ill children or family emergencies (if not legally required)</li> <li>• Provision of paternity / maternity leave (if not legally required)</li> <li>• Information on the applicability of religious holidays (if not legally required)</li> </ul>   |
| <b>Trade unions / collective bargaining</b>                                   | <ul style="list-style-type: none"> <li>• Evidence of the existence of unions, works council or alternative means of association</li> <li>• Evidence of access provided to trade union representatives on company grounds, existence and content of collective bargaining agreements, percentage of unionised workers, evidence of strikes and how they were resolved</li> </ul>   |

## Human Rights Assessments in the Tourism Sector - A data collection guide for practitioners

|  |   |
|--|---|
| <b>Health and Safety</b>   | <ul style="list-style-type: none"> <li>• Information on health and safety management processes and statistics (e.g. number of workplace accidents), content and frequency of training, provision of protective equipment</li> <li>• Information on specific health and safety measures for workers at higher risk (e.g. pregnant women, drivers)</li> <li>• Number of health and safety inspections, fire drills etc.</li> <li>• Information on follow-up to non-compliances</li> <li>• Information on existence and conditions in dormitories and worker transport facilities</li> </ul>   |
| <b>Non-discrimination / diversity / sexual harassment</b>  | <ul style="list-style-type: none"> <li>• Evidence of measures to protect (high risk) workers from sexual harassment and discrimination (e.g. trainings, awareness raising)</li> <li>• Information on incidents of discrimination and how they were followed-up</li> <li>• Information on specific regulations for employee clothing / specific religious needs of employees</li> <li>• Measures to ensure employee privacy</li> <li>• Information on measures to promote diversity</li> </ul>   |
| <b>Grievance mechanisms</b>  | <ul style="list-style-type: none"> <li>• Existence of grievance mechanisms and information on how it is currently being communicated to and used by employees /contract workers</li> <li>• Alignment of existing grievance mechanisms with the UN Guiding Principles effectiveness criteria</li> </ul>  |
| <b>Supplier / business partner due diligence</b>   | <ul style="list-style-type: none"> <li>• Information on the consideration of employee rights when selecting, monitoring, training or ending relationships with suppliers / other business partners (e.g. recruitment agencies)</li> </ul>   |
| <b>Outcome – impact indicators (relevant for interviews with hotel / supplier employees / informal workers / service provider employees and community representatives)</b> |   |
| <b>Forced labour</b>   | <ul style="list-style-type: none"> <li>• Existence of written contracts and measures taken to ensure awareness of rights and responsibilities in case of illiterate employees</li> <li>• Information on whether identity documents are withheld or fees were paid to obtain the employment</li> <li>• Evidence that workers are free to leave the premises when they resign or their shift is ending</li> </ul>   |
| <b>Working hours / overtime / holiday / benefits / living wages</b>  | <ul style="list-style-type: none"> <li>• Information on voluntary and involuntary labour turnover</li> <li>• Information on the payment of overtime or tips, usual overtime hours per week / month, conditions for overtime, requirement of night work</li> <li>• Workers indicate whether they can satisfy basic needs and those of their families while enabling some discretionary income with their wages</li> <li>• Information on whether employment status / employment benefits / working conditions have been affected by tourism activity / company</li> <li>• Description of training opportunities for employees</li> </ul> |
| <b>Health and safety impacts</b>   | <ul style="list-style-type: none"> <li>• Evidence of personal protective equipment where required and that it was provided at no cost to the employee</li> <li>• Information on obtained injuries or long-term health effects related to work</li> </ul>  |

## Human Rights Assessments in the Tourism Sector - A data collection guide for practitioners

|   |  |
|---|--|
|   | <ul style="list-style-type: none"> <li>• Information on health and safety training received, local sanitation and first aid facilities, access to drinking water, sick leave and health care coverage</li> <li>• Conditions of transport safety, conditions of dormitories or overnight facilities where they exist</li> </ul>   |
| <b>Discrimination / harassment / adequate working conditions:<sup>5</sup></b> | <ul style="list-style-type: none"> <li>• Evidence / information on discrimination, harassment, abuse or threats, signs of preference, distinction or exclusion in the hiring, promotion or training process based on health status, sexual orientation, age, gender, ethnicity, political or religious beliefs</li> <li>• Evidence of different working conditions for migrant workers vis-à-vis their colleagues in similar positions</li> </ul>  |
| <b>Trade unions / collective bargaining</b>                                   | <ul style="list-style-type: none"> <li>• Evidence of existence of worker representation or works councils or other forms of worker engagement</li> <li>• Information of perception of trade unions amongst employees (trust in unions, dissatisfaction with negotiation positions, etc.)</li> <li>• Existence of employee-only meetings</li> <li>• Evidence of strikes and reaction of management</li> <li>• Existence and awareness of collective bargaining agreements and their contents amongst workers</li> </ul> |
| <b>Grievance mechanisms</b>   | <ul style="list-style-type: none"> <li>• Evidence that employees are aware of and use existing grievance mechanisms</li> <li>• Information on the type and nature of filed complaints and whether employees were satisfied with the solution and the grievance process</li> </ul>  |
| <b>Privacy / freedom of expression / religion</b>                             | <ul style="list-style-type: none"> <li>• Evidence of searches of personal belongings or employees correspondence / telephone calls</li> <li>• Evidence of the accommodation of religious needs in holiday and work schedule</li> <li>• Perception of employees as to whether they can express their opinion without fearing repercussions</li> </ul>   |
| <b>Child labour / young workers</b>   | <ul style="list-style-type: none"> <li>• Evidence of (former) child workers and remediation measures when child labour was discovered</li> <li>• Information on specific protection measures for young workers and whether they can attend school if still of school age</li> </ul>  |
| <b>Workers with family responsibilities</b>                                   | <ul style="list-style-type: none"> <li>• Information on how migrant workers arrange for child care and how often they get to see their families</li> <li>• Evidence of pregnancy tests or other health tests</li> <li>• Existence of health and safety precautions for pregnant women</li> <li>• Evidence of and use of breast feeding and child care facilities</li> <li>• Awareness of workers of maternity or paternity leave provisions and whether it has been taken by employees</li> </ul>                      |

<sup>5</sup> To be raised carefully, in a culturally appropriate manner and in individual interviews only (!).



## 2. Security / Safety of personnel and tourists

| Indicators for interview processes   |   |
|--|---|
| Topics   | Evidence related to <ul style="list-style-type: none"> <li>respecting human rights</li> <li>promoting/supporting human rights</li> </ul>  |
| <b>Structural indicators (government / civil society / development agencies / international organization / trade union representatives)</b>                                |   |
| <b>Cases / allegations involving company / partner hotels / suppliers</b>  | <ul style="list-style-type: none"> <li>Evidence of incidents or complaints in relation to security forces protecting tourism facilities / related to the activities of the company</li> <li>Evidence or allegations of executions / undue arrest / detention / torture/ disappearances or other form of violence against communities related to the company / touristic activities in the region</li> </ul>   |
| <b>High risk groups</b>  | <ul style="list-style-type: none"> <li>Evidence of risks for human rights defenders / campaigners / community members protesting tourism projects (detention, torture, arbitrary arrests)</li> </ul>  |
| <b>Management practice (management documentation and interviews with local management, partner hotel or supplier management)</b>   |   |
| <b>Personal safety</b>   | <ul style="list-style-type: none"> <li>Information on management processes to ensure the personal safety of employees and clients particularly in high risk periods (elections, natural disasters, emergencies)</li> <li>Information on measures to protect workers from harassment, violent or threatening conduct from customers or third parties</li> <li>Information on emergency procedures (evacuation plans, alarm systems, medical relief, training of employees)</li> <li>Information on specific measures to ensure safety of child tourists (e.g. when in kids' clubs etc.)</li> </ul> |
| <b>Security personnel due diligence</b>  | <ul style="list-style-type: none"> <li>Information on security risk assessments</li> <li>Evidence of selection process and background checks, contract contents and training delivered to security guards</li> <li>Information on number of security guards and whether they are armed, range of measures they are allowed to deploy to ensure security</li> <li>Information on complaints made related to the security personnel and how company responded</li> <li>Information on monitoring of impacts on local communities related to local security arrangements</li> </ul>                  |
| <b>Government engagement</b>   | <ul style="list-style-type: none"> <li>Evidence of interaction with public armed forces / policemen (where applicable)</li> <li>Evidence of measures to avoid complicity with human rights abuses (e.g. related to local protests)</li> </ul>   |
| <b>Outcome – impact indicators (relevant for interviews with hotel / supplier employees / informal workers / service provider employees and community representatives)</b> |   |
| <b>Security guards</b>   | <ul style="list-style-type: none"> <li>Information from security guards on training they received, what they do if someone external enters hotel premises or attacks guests, how they treat suspects or protesters, anecdotal evidence of cases</li> </ul>  |
| <b>Safety of tourists</b>  | <ul style="list-style-type: none"> <li>Evidence of cases of robbery / violence against tourists</li> </ul>  |

### 3. Customer protection and information

| Indicators for interview processes   |   |
|--|---|
| Topics   | Evidence related to <ul style="list-style-type: none"> <li>• respecting human rights</li> <li>• promoting/supporting human rights</li> </ul>  |
| <b>Structural indicators (government / civil society / development agencies / international organization / trade union representatives)</b>                                |   |
| Cases / allegations involving company / partner hotels / suppliers / local government  | <ul style="list-style-type: none"> <li>• Evidence of patterns of customer rights violations</li> <li>• Government interference with e-mail / telephone / internet use</li> </ul>  |
| <b>Management practice (management documentation and interviews with local management, partner hotel or supplier management)</b>   |   |
| Customer marketing and information   | <ul style="list-style-type: none"> <li>• Information on measures to raise awareness amongst customers on human rights issues (e.g. related to sex and child sex tourism or environmental impacts) and encourage appropriate/ethical behaviour on religious and cultural sites or use of local products</li> <li>• Information on ethical marketing standards (if available)</li> <li>• Information on communication of sustainability efforts to customers and business partners</li> </ul> |
| Customer privacy   | <ul style="list-style-type: none"> <li>• Policy commitments related to customer data / security</li> <li>• Information on video surveillance measures on premises and how footage is handled</li> </ul>   |
| Grievance mechanisms   | <ul style="list-style-type: none"> <li>• Information on customer complaints mechanisms and incoming cases</li> </ul>  |
| <b>Outcome – impact indicators (relevant for interviews with hotel / supplier employees / informal workers / service provider employees and community representatives)</b> |   |
| Community impacts  | <ul style="list-style-type: none"> <li>• Information on the perception of local communities regarding respectful treatment by tourists / any concerns or grievances related to tourists visiting their communities or how tourism affects cultural sites</li> </ul>   |

#### 4. Impacts of suppliers, contractors and other business partners

| Indicators for interview processes   |   |
|--|---|
| Topics   | Evidence related to <ul style="list-style-type: none"> <li>respecting human rights</li> <li>promoting/supporting human rights</li> </ul>  |
| <b>Structural indicators (government / civil society / development agencies / international organization / trade union representatives)</b>                                |   |
| Cases / allegations involving company / partner hotels / suppliers / local government  | <ul style="list-style-type: none"> <li>Evidence or information on cases or allegations of involvement in human rights abuses related to major hotel groups/chains</li> </ul>  |
| Good practice  | <ul style="list-style-type: none"> <li>Evidence of good practice examples related to supply chain management and the tourism industry (e.g. sector initiatives, fair trade certifications, local sourcing projects)</li> </ul>  |
| Government initiatives   | <ul style="list-style-type: none"> <li>Information on government agenda related to tourism development / available studies on economic impact of tourism</li> </ul>   |
| <b>Management practice (management documentation and interviews with local management, partner hotel or supplier management)</b>   |   |
| Policy commitments   | <ul style="list-style-type: none"> <li>Information on code of conduct and other relevant policy frameworks and whether they cover tourism related human rights risks (e.g. workers' rights, community impacts, child labour)</li> </ul>   |
| Risk and impact assessment processes   | <ul style="list-style-type: none"> <li>Information on existing risk or impact assessment processes to understand and address value or supply chain related sustainability risks (e.g. pre-qualification assessments or background checks, audits, percentage and tiers of suppliers that have signed code of conduct, key risks at different supply chain stages etc.)</li> </ul>   |
| Integration and monitoring   | <ul style="list-style-type: none"> <li>Information on current performance management and monitoring measures and which human rights aspects they cover</li> <li>Information on usage of certification, information on processes to address identified risks of subcontracting</li> <li>Information on integration of human rights related risks in buying practices / pricing</li> <li>Information on training provided to employees or business partners to recognise and escalate negative human rights impacts</li> <li>Information on incentives for suppliers / business partners to encourage ethical behaviour (contract clauses, guarantees for long-term commitments, capacity building)</li> <li>Information on initiatives around local sourcing / supplier diversity</li> </ul> |
| Grievance mechanisms   | <ul style="list-style-type: none"> <li>Information on how suppliers / business partners are encouraged to set up functioning grievance mechanisms and / or whether own grievance mechanisms are available to suppliers / business partners' employees</li> </ul>  |
| <b>Outcome – impact indicators (relevant for interviews with hotel / supplier employees / informal workers / service provider employees and community representatives)</b> |   |
| Covered in employee rights and protection / community impacts  | <ul style="list-style-type: none"> <li>Refer to community impacts, employee rights and women and children's rights to identify actual impacts linked to buying or sourcing practices, e.g. when speaking to supplier employees about their wages or overtime</li> </ul>   |

## 5. Women's and children's rights and protection

| Indicators for interview processes  |   |
|---|---|
| Topics  | Evidence related to <ul style="list-style-type: none"> <li>• respecting human rights</li> <li>• promoting/supporting human rights</li> </ul>  |
| <b>Structural indicators (government / civil society / development agencies / international organization / trade union representatives)</b> |   |
| <b>Cases and patterns of vulnerability</b>  | <ul style="list-style-type: none"> <li>• Information/ reports on negative impacts on women or children in the tourism sector/related to the company</li> <li>• Information on areas of vulnerability for women and children, especially girl children, to be negatively impacted through tourism and how government and tourism companies address them</li> </ul>   |
| <b>Good practice</b>  | <ul style="list-style-type: none"> <li>• Information on existing good practice ensuring that women and children are benefitting from tourism</li> </ul>   |
| <b>Government initiatives</b>   | <ul style="list-style-type: none"> <li>• Information on the existence and effectiveness of governmental monitoring of child labour and child sexual abuse</li> <li>• Information on government initiatives related to childcare or provision of health and education (e.g. to migrant workers)</li> </ul>   |
| <b>Management practice (management documentation and interviews with local management, partner hotel or supplier management)</b>            |   |
| <b>Policy commitment</b>  | <ul style="list-style-type: none"> <li>• Policy commitments regarding equal pay and benefits for women and men; non-discrimination; zero tolerance towards all forms of violence and sexual harassment at work</li> </ul>   |
| <b>Risk and impact assessment</b>   | <ul style="list-style-type: none"> <li>• Information on risk and impact assessment processes to ensure activities and business relationships do not negatively impact women and children</li> <li>• Awareness of actual examples of negative impacts and how they were resolved</li> </ul>  |
| <b>Integration and monitoring</b>   | <ul style="list-style-type: none"> <li>• Measures to implement equal pay and benefits for women and men</li> <li>• Measures to ensure women's participation in decision-making bodies and processes</li> <li>• Measures to ensure women's health and safety at work, including regarding reproductive health, to prevent sexual harassment and to ensure the safety of female employees when travelling to and from work</li> <li>• Information on the provision of safe and decent accommodation for female migrant workers</li> <li>• Measures to promote education, development and promotion opportunities for female employees</li> <li>• Measures that promote decent work for caregivers (secure work, fair wages, predictable working hours and shifts to enable consistent child care)</li> <li>• Information on how families with children are supported if a caregiver is injured or killed at work</li> <li>• Information on 'working with children' checks or screening for relevant employees</li> <li>• Information on how employees working with customers' children are trained to ensure the children's safety and wellbeing</li> </ul> |

## Human Rights Assessments in the Tourism Sector - A data collection guide for practitioners

|  |   |
|--|---|
|  | <ul style="list-style-type: none"> <li>Information on whether the company facilitates school or orphanage tourism and measures taken to ensure it does not have negative impacts on children</li> <li>Information on initiatives to establish childcare centres, provide financial support for childcare or contribute to employee children's school fees</li> <li>Information on specific initiatives / projects to support women and children, information on staff or business partner training to detect signs of child or women abuse, child sex tourism and trafficking</li> </ul>  |
| <b>Communication</b>   | <ul style="list-style-type: none"> <li>Information on the public stance the company takes to prevent abuse of women and children (customer communication, information leaflets, posters)</li> </ul>   |
| <b>Grievance management</b>  | <ul style="list-style-type: none"> <li>Information on existing grievance mechanisms and how these are used by female employees or caregivers</li> <li>Information on grievance systems available to customers regarding their children and their use</li> <li>Information on existing grievance mechanisms and whether these are used by victims of trafficking / child sex tourism or customers</li> </ul>   |
| <b>Stakeholder engagement</b>  | <ul style="list-style-type: none"> <li>Information on engagement of the company with women and children (as specific high risk groups)</li> <li>Information on how the company engages with the local police to prevent child sex tourism</li> <li>Information on how the company engages with local authorities to prevent sexual harassment / abuse of women on the way to and from work</li> <li>Information on cooperation with local civil society to protect children's and women's rights</li> </ul>   |
| <b>Outcome – impact indicators (relevant for interviews with hotel / supplier employees / informal workers / service provider employees and community representatives)</b> |   |
| <b>Community impacts</b>   | <ul style="list-style-type: none"> <li>Information on whether women/children feel less / more secure since the start of touristic activities</li> <li>Information/evidence of cases of sexual harassment / abuse / exploitation related to tourism with regard to women, children and adolescents</li> <li>Information on the perception of job opportunities for women</li> <li>Information on prevalence of school or orphanage tourism in the community (which may involve commercial or sexual exploitation of children as well as separation of children from their families)</li> </ul>   |
| <b>Employee impacts</b>  | <ul style="list-style-type: none"> <li>Observations by employees related to risks for women and children in and related to the workplace and how they are currently mitigated</li> <li>Information on how safe and fairly treated female employers feel at work</li> <li>Information on how female workers perceive their opportunities for promotion etc. vis-à-vis their male colleagues</li> <li>Information on whether employees with caregiving responsibilities benefit from employer-provided childcare (if applicable) and if yes, if it is sufficient; alternatively, whether they can adequately plan and pay for childcare</li> <li>Information on whether the children of migrant workers have access to health and education services</li> <li>Information on whether female (migrant) workers feel their accommodation is safe and decent</li> <li>Information on whether female employees feel safe travelling to and from work</li> </ul> |
| <b>Security of women and children</b>  | <ul style="list-style-type: none"> <li>Information on cases of sexual violence or abuse of women and children since the beginning of tourism</li> </ul>   |

## 6. Community impacts and engagement

| Indicators for interview processes  |   |
|---|---|
| Topics  | Evidence related to <ul style="list-style-type: none"> <li>respecting human rights</li> <li>promoting/supporting human rights</li> </ul>  |
| <b>Structural indicators (government / civil society / development agencies / international organisation / trade union representatives)</b> |   |
| Cases   | <ul style="list-style-type: none"> <li>Information on cases of displacement or community protest related to tourism</li> </ul>  |
| Good practice / positive impacts  | <ul style="list-style-type: none"> <li>Examples of functioning community engagement or grievance processes</li> <li>Examples of local communities benefitting from tourism and information on enabling factors</li> <li>Information on jobs / training provided by tourism industry</li> </ul>  |
| Legislation   | <ul style="list-style-type: none"> <li>Information on national legislation related to the treatment of indigenous peoples or ethnic / religious minorities, environmental legislation, land rights and usage including customary land right systems and how they are relevant for tourism in country</li> </ul>   |
| <b>Management practice (management documentation and interviews with local management, partner hotel or supplier management)</b>            |   |
| Policy commitment   | <ul style="list-style-type: none"> <li>Information on existing policy commitments related to community engagement and management of community impacts</li> </ul>  |
| Risk and impact assessment  | <ul style="list-style-type: none"> <li>Information on existing risk or impact assessment processes addressing community impacts and how community representatives were consulted in this process with specific focus on: Risks related to water use and waste and sewage water disposal, access to electricity, land rights, impacts on food availability, environmental degradation, usage of traditional/spiritual land, and/or relocation of communities related to tourism infrastructure and operations</li> </ul> |
| Integration and monitoring  | <ul style="list-style-type: none"> <li>Information on how results of risk assessment processes are integrated in policies and processes</li> <li>Information on training for employees around community impact</li> <li>Information provided to tourists on how to respect community rights</li> <li>Information on how the company seeks to promote local businesses / informal traders</li> <li>Percentage and type of locally sourced goods</li> </ul>   |
| Grievance management  | <ul style="list-style-type: none"> <li>Information on allegations / protests / cases related to community rights and how they were responded to</li> <li>Information on available grievance mechanisms and how they are used, subject of complaints received so far</li> </ul>  |
| Community Engagement  | <ul style="list-style-type: none"> <li>Information on existing community engagement processes (e.g. with which communities, points and subjects of interactions, formats and regularity, which communities or groups might not be covered /included by these processes, civil society engagement)</li> </ul>  |
| Social investment / positive impacts  | <ul style="list-style-type: none"> <li>Information on existing community programs and how their focus was determined</li> <li>Information on the percentage of local staff and the position they hold, information on local recruitment processes</li> </ul>  |



## Human Rights Assessments in the Tourism Sector - A data collection guide for practitioners

| <b>Outcome – impact indicators (relevant for interviews with hotel / supplier employees / informal workers / service provider employees and community representatives)</b> |  |
|--|--|
| <b>Tourism benefits /positive impacts</b>  | <ul style="list-style-type: none"> <li>Information on examples of positive economic impacts related to tourism (job creation, improvement of infrastructure)</li> </ul>  |
| <b>Community engagement</b>  | <ul style="list-style-type: none"> <li>Information on community perception of community engagement: Power relations, quality of engagement, examples of actual consultations that have taken place and objectives of these engagement process</li> <li>Information on inclusiveness of consultation process (e.g. how were women, children, non-literate people considered)</li> <li>Information of community members' satisfaction with the consultation outcomes and the information provided during the consultation process</li> </ul>   |
| <b>Job opportunities for community members at the tourism industry / hotel / supplier</b>  | <ul style="list-style-type: none"> <li>Information on cases of discrimination, harassment or forced labour, information on wages and social benefits received</li> <li>Information on local conflict related to the (non-)employment</li> <li>Information on employment and training opportunities provided to local community</li> </ul>  |
| <b>Land rights / livelihood impacts</b>  | <ul style="list-style-type: none"> <li>Evidence/information on negative impacts related to access to land / traditional land usage, freedom of movement and consequences for local livelihood, safe access to resources (hunting or fishing areas, water), religious sites, etc.</li> <li>Where applicable, information on land acquisition process, i.e. consultation, compensation, information provided, (forced) relocations, and community perceptions of the outcome of this process (satisfied / dissatisfied)</li> <li>Information on the specific impacts on high risk groups (women, children)</li> <li>Information on rising food, water or rent prices since the beginning of tourism activity, changes in average income percentage spend on food, water, housing or basic education</li> </ul> |
| <b>Health impacts</b>  | <ul style="list-style-type: none"> <li>Information on changes to health and access to healthcare related to tourism activity (e.g. new diseases transmitted by tourists, rising cost or declining quality of health service, distance between homes and health care facilities)</li> </ul>   |
| <b>Access to education</b>   | <ul style="list-style-type: none"> <li>Information on changes in access to education (e.g. longer distances)</li> <li>Percentage of children attending primary / secondary school, any new, closed or reopened schools linked to tourism activity, changing costs for education)</li> <li>Information on educational programs by company and how they are perceived by community members</li> </ul>  |
| <b>Self-determination/cultural rights</b>  | <ul style="list-style-type: none"> <li>Evidence or information of negative impacts on traditions, religion, knowledge or cultural life (e.g. changing traditional roles, traditional authorities, economic exchange systems, religious sites or buildings affected by tourism activity)</li> <li>Information on the self-identification of the community as indigenous group and impacts of touristic activity on recognition process</li> <li>Information on changed community structures linked to tourism (e.g. younger men leaving villages to search work in cities or at hotels)</li> <li>Information on impacts of company measures to ensure community culture and traditions are respected</li> </ul>   |
| <b>Discrimination</b>  | <ul style="list-style-type: none"> <li>Evidence / information on cases of discrimination related to tourism activity</li> </ul>  |

## Human Rights Assessments in the Tourism Sector - A data collection guide for practitioners

|                                      |  |
|--------------------------------------|--|
| <b>Privacy / family life</b>         | <ul style="list-style-type: none"> <li>Information on impacts of touristic activities on personal or family privacy (e.g. through guided tours)</li> </ul>   |
| <b>Freedom of expression</b>         | <ul style="list-style-type: none"> <li>Information on communities' ability to criticise the company / tourism related activity without reprisal</li> <li>Information on cases of intimidation or harassment/ punishment by the company related to criticism or protest against tourism activity</li> </ul>   |
| <b>Impacts on community security</b> | <ul style="list-style-type: none"> <li>Perception or evidence of changed security situation since the beginning of tourism / construction of hotels</li> <li>Information on cases of mistreatment / harassment /abuse / threats by company representatives / security guards or detainment / enforced disappearances / casualties</li> <li>If cases of mistreatment exist, collect information on the reaction of the company and government representatives</li> </ul>  |
| <b>Grievance mechanisms</b>          | <ul style="list-style-type: none"> <li>Evidence / information that the community is aware of existing grievance channels and if they are actively used</li> <li>Information on follow up / reaction to complaints and whether community members were satisfied</li> <li>Information on whether communities were involved in the design of grievance mechanisms</li> <li>Information on accessibility of governmental or judicial grievance mechanisms (costs, evidence of actual cases and the outcomes, financial support)</li> </ul> |

## 7. Anti-corruption

| Indicators for interview processes   |   |
|--|---|
| Topics   | Evidence related to <ul style="list-style-type: none"> <li>• respecting human rights</li> <li>• promoting/supporting human rights</li> </ul>  |
| <b>Structural indicators (government / civil society / development agencies / international organisations / trade union representatives)</b>                               |   |
| Good practice  | <ul style="list-style-type: none"> <li>• Information on creative/effective projects to address corruption</li> </ul>  |
| Cases  | <ul style="list-style-type: none"> <li>• Information/ reports on corruption and bribery in the tourism sector/related to the company</li> </ul>   |
| <b>Management practice (management documentation and interviews with local management, partner hotel or supplier management)</b>   |   |
| Compliance / anti-corruption processes   | <ul style="list-style-type: none"> <li>• Information on measures that seek to prevent bribery and corruption amongst employees and business partners (e.g. policies, trainings, key performance indicators, disciplinary processes, speak up lines)</li> <li>• Information on actual cases/allegations and how they were solved (check information during employee interviews)</li> </ul> |
| Government relations   | <ul style="list-style-type: none"> <li>• Information on preferential conditions (e.g. tax exemptions or incentives) and other forms of government interactions (procurement from government, contracts with government) and how these are handled</li> </ul>  |
| <b>Outcome – impact indicators (relevant for interviews with hotel / supplier employees / informal workers / service provider employees and community representatives)</b> |   |
| Community impacts  | <ul style="list-style-type: none"> <li>• Information/evidence on cases of bribery, corruption related to tourism activity (e. g. company representative / local government requesting extra payments for services or favours, appropriation of money meant for the community, distribution of money that is not fair and transparent, corruption related to land use)</li> </ul>          |
| Employee interviews  | <ul style="list-style-type: none"> <li>• If time allows, check existence of above mentioned systems during employee interviews</li> </ul>   |

## Considerations for data collection and evaluation

Experience from past human rights assessments across different sectors shows that collecting and analysing human rights related data is challenging because human rights impacts can hardly be quantified and are highly dependent on the specific local context. Different interviewees may express different perspectives on potential and actual human rights impacts and incidents that have occurred. Triangulation of information can help to reduce bias and improve the validity of assessment results.

Most interview partners will not be aware that what they have experienced relates to their human rights. Understanding human rights impacts – especially when they concern more vulnerable individuals and groups – requires cultural sensitivity and the ability to understand nuances. A thorough human rights impact assessment should involve an assessment team with a broad range of skills (legal knowledge, community engagement competence, local knowledge of the country in question, etc.) and sufficient resources to make sure that the approach and scope of the assessment (e.g. number of considered hotels, engagement formats) is adequate given the complexity of the company's human rights risk profile in the country or region in question.

Equally important, corporate human rights impact assessment data should be analysed using a human rights framework. This means, among other things, that the severity of (potential) impacts should be assessed (based on scale, scope and irremediability as defined in the UN Guiding Principles) and most severe impacts addressed first.

## References for further reading

---

**Danish Institute for Human Rights, Human Rights Impact Assessment Guidance and Toolbox**, available here: <http://www.humanrights.dk/business/tools/human-rights-impact-assessment-guidance-and-toolbox>

**Danish Institute for Human Rights, Human Rights Indicator Platform**, available here: <https://business-humanrights.org/en/platform-for-human-rights-indicators-for-business-hrib>

**Kuoni Human Rights Impact Assessment Report, Kenya (2012)**, available here: [http://cr.kuoni.com/docs/assessing\\_human\\_rights\\_impacts\\_0.pdf](http://cr.kuoni.com/docs/assessing_human_rights_impacts_0.pdf)

**Kuoni Human Rights Impact Assessment Report, India (2014)**, available here: [http://cr.kuoni.com/docs/kuoni\\_hria\\_india\\_2014\\_website\\_0\\_0\\_4.pdf](http://cr.kuoni.com/docs/kuoni_hria_india_2014_website_0_0_4.pdf)

**Myanmar Centre for Responsible Business, sector-wide human rights impact assessment in the tourism sector in Myanmar**, <http://www.myanmar-responsiblebusiness.org/swia/tourism.html>

**Nomogaia, Human Rights Impact Assessment Toolkit**, available here: <http://nomogaia.org/tools/>

**Rights & Democracy, Human Rights Impact Assessment Guide**, available here: <http://hria.equalit.ie/en/>

**Roundtable Human Rights in Tourism**, <http://www.menschenrechte-im-tourismus.net/en/home.html>

**UNICEF & Danish Institute for Human Rights, Children's Rights in Impact Assessments, 2013**, available here: <https://www.unicef.org/csr/156.htm>

**UNICEF, Engaging Stakeholders on Children's Rights, 2014**, available here: <https://www.unicef.org/csr/568.htm>