

# PROTECTING CHILDREN IN TRAVEL AND TOURISM A GLOBAL CASE STUDY: HOW TO REGULATE THE ISSUE OF VOLUNTOURISM WITH CHILDREN?

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A global case study based on actionable models and experiences from selected origin and destination countries, with a technical brief to guide action across countries and regions.



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# 1. DOCUMENTATION CONTEXT

This case study on how to regulate voluntourism that involves children is based on the analysis of actionable models resulting from the experiences of the selected origin and destination countries that undertook efforts to address this issue over the last years. The approaches and promising practices in this case study are presented

as practical examples, with a technical brief to guide governments, businesses, civil society organisations, and other institutions to build effective partnerships and take action to protect children from the negative impacts of unregulated voluntourism.

In this case study, **professional volunteering is distinguished from voluntourism with children, the latter** referring to products offered through the travel market usually to unskilled volunteers, who pay companies or other entities to travel and work in distant communities, as an attractive alternative to mass tourism. Although travellers may have good intentions, such trips may negatively affect the well-being of children, with certain forms of voluntourism posing additional risks to their safety by providing avenues for perpetrators of sexual crimes to groom, access, and sexually exploit and abuse children.

This case study recognises that **voluntourism is a complex and diverse industry, encompassing a wide range of activities that sometimes do not directly engage with children**, and that cover other thematic areas, such as for example environmental or development projects. Such activities can be positive if organised in a responsible way, including in relation to wildlife and impacts on local communities. Even in case of activities that do not directly involve children, **the risks and impacts on children need to be considered when working in local and remote communities** as part of direct interactions, homestays or other activities. Importantly, all forms of professional volunteering and volunteering activities in tourism (voluntourism) need to adhere to the highest child protection standards.

This case study reflects **practical approaches** that have been undertaken in response to the Global Call for Robust Child Protection structures in Travel and Tourism<sup>1</sup> that was launched based on the recommendations from two reports presented in October 2023 by the United Nations' Special Rapporteur on the Sale, Sexual Exploitation and Sexual Abuse of Children and the United Nations' Special Representative of the Secretary-General on Violence against Children at the United Nations General Assembly. These reports aim to place child protection at the core of sustainable development and to reshape voluntourism practices.

One of the key conclusions of this joint action was that **voluntourism practices need to be reshaped**, as it is a market fuelled by financial gains for companies and other types of organisations that cater to travellers looking for trips that they hope will have a positive impact. Voluntourism packages are offered to gain profit, while intentionally, or as a result of lack of awareness, distorting the understanding of how to bring about change, especially when it comes to engaging with children. Travellers are increasingly seeking to visit less touristed areas or to ensure they have a positive impact on the communities they visit.<sup>2</sup>

<sup>1</sup> ECPAT International. (2023). [Global Call for Robust Child Protection structures in Travel and Tourism](#).

<sup>2</sup> Skyscanner, (2025). [Future of travel - Looking to the horizon](#).

<sup>3</sup> Action Pour les Enfants (APLE) - [ECPAT Cambodia](#).

<sup>4</sup> PEaCE - [ECPAT Sri Lanka](#).

<sup>5</sup> [ECPAT Philippines](#).

<sup>6</sup> The project "Strengthening Child Protection System in the Travel and Tourism Context" was implemented by ECPAT International with the financial assistance of UBS Optimus Foundation.

It is the role of governments to take urgent measures to regulate voluntourism practices to protect children's rights to quality education, privacy and a life free from all forms of violence, including sexual exploitation.



**The practical experiences and approaches to reshaping the issue of voluntourism presented in this case study come from selected destination countries in Asia.**

Three organisations have been collaborating with ECPAT International on the project "Strengthening Child Protection System in the Travel and Tourism Context": Action Pour les Enfants (APLE) - ECPAT Cambodia,<sup>3</sup> PEaCE - ECPAT Sri Lanka,<sup>4</sup> and ECPAT Philippines.<sup>5</sup> The project aimed at improving child protection measures within voluntourism regulation, by developing actionable and replicable models in other countries.<sup>6</sup> These cases are complemented with the experience of ECPAT Indonesia which also undertook the journey to address the issue of voluntourism with children.

Progress in reshaping voluntourism practices with children was also reflected in the approaches taken to regulate this issue by four origin countries in Europe. The involved organisations were: ECPAT Germany<sup>7</sup> and Tourism Watch @ Brot für die Welt,<sup>8</sup> Tearfund Ireland,<sup>9</sup> Comhlámh and Comhlámh's End Orphanage Volunteering Working Group<sup>10</sup> from Ireland; Defence for Children - ECPAT Netherlands<sup>11</sup> and Better Care Network Netherlands.<sup>12</sup> The study also includes an example of the advocacy approach undertaken by ECPAT Norway<sup>13</sup> in response to the global call to regulate the issue of voluntourism.

This case study also reflects the practical solutions from Australia, and from the Thematic Brief on Volunteering, Voluntourism, Tourism, and Trafficking in Orphanages<sup>14</sup> that was developed by the Task Force led by members of the Transforming Children's Care Collaborative to provide guidance to governments, policymakers and decision-makers.

In addition, the case study includes the outcomes from the six regional dialogues that were organised by ECPAT International with its global network of 134 organisations, as well as other partners including local civil society organisations and global alliances, such as Down to Zero Alliance,<sup>15</sup> as well as international and regional intergovernmental bodies. The regional workshops were organised by ECPAT International to step-up "Collective Action to End Child Sexual Exploitation and Abuse of Children" in Southeast Asia and Pacific, Middle East and North Africa, West, Central and North Africa, the Americas, South Asia, Europe, Central Asia and the Caucasus.<sup>16</sup> The dialogues reflected on practical avenues and approaches to address the issue of unregulated voluntourism across the regions, bringing together 550 participants from 260 organisations and a total of 143 countries.<sup>17</sup>

Finally, the case study was informed by the outcomes from a Global Roundtable organised by ECPAT International in Bangkok (December, 2024) with the participation of Ms. Mama Fatima, United Nations Special Rapporteur on the sale and sexual exploitation of children, in cooperation with Better Care Network and other partners, to take stock of the progress made one year from the launch of the Special Rapporteur's report on this issue, with a closer look at the phenomenon of voluntourism.<sup>18</sup>



This case study was developed as a partnership between ECPAT International and Better Care Network. Voluntourism has a global nature and requires cooperation and coordination within and between origin and destination countries, and the following examples demonstrate that there is no one solution that fits all. While each country has achieved some progress, each has also some gaps and remaining challenges reflecting the complexity of regulating this sector.

With this premise, this global case study is intended to inspire global, regional and country-level action to make a real change by bringing positive contribution to children and local communities.

<sup>7</sup> ECPAT [Deutschland e.V.](#)

<sup>8</sup> [Tourism Watch @ Brot für die Welt.](#)

<sup>9</sup> [Tearfund Ireland.](#)

<sup>10</sup> [Comhlámh. End Orphanage Care & Volunteering.](#)

<sup>11</sup> [Defence for Children - ECPAT Netherlands.](#)

<sup>12</sup> [Better Care Network Netherlands.](#)

<sup>13</sup> [ECPAT Norway.](#)

<sup>14</sup> Global Policy and Advocacy Working Group. (n.d.). [Volunteering, Voluntourism, Tourism, and Trafficking in Orphanages. Thematic Brief.](#) Transforming Children's Care Collaborative.

<sup>15</sup> The Down to Zero Alliance is committed to the protection of children and the prevention of sexual exploitation in 12 countries in Asia and Latin America. [Terre des Hommes Netherlands](#) (lead), [Child Rights Coalition Asia](#) (CRC Asia), [Conexión](#), [Defence for Children - Ecpat](#), [Free A Girl](#) and [Plan International](#) work together in the Down to Zero Alliance with the Ministry of Foreign Affairs of the Netherlands to address the sexual exploitation of children. More at: [Down to Zero.](#)

<sup>16</sup> The reports from the Regional Workshops can be accessed here: [ECPAT International: collective action.](#) The workshops were held in Bangkok, Thailand; Dakar, Senegal; San Jose, Costa Rica; Jordan, Amman; Kathmandu, Nepal; Vienna, Austria; and in Tashkent, Uzbekistan, between March and October 2024.

<sup>17</sup> In this case study, examples from Latin America have been also reflected (Colombia, Peru and Uruguay). This global case study also reflects the recommendations from a destination country in Africa, through the contribution of the [Kenya Alliance for Advancement of Children \(KAACR\).](#)

<sup>18</sup> The global roundtable was held on 17th December 2024 in Bangkok and online, with the contributions of: [Action Pour les Enfants \(APLE\)](#) - ECPAT Cambodia; [PEaCE - ECPAT Sri Lanka](#); [ECPAT Philippines](#); [ECPAT Indonesia](#); [ECPAT Korea](#); [ECPAT Foundation Thailand](#); [ECPAT Germany](#); [DCI-ECPAT Netherlands](#) and [Better Care Network Netherlands](#); [Tearfund](#) and [Comhlámh](#), as Co-Convenors of the End Orphanage Volunteering Working Group in Ireland; [ECPAT Norway](#) and the Norwegian School of Hotel Management - [University of Stavanger](#); and [Better Care Network](#) and the representatives of the Transforming Children's Care Collaborative's Task Force on Orphanage Tourism, Voluntourism and Trafficking.

## 2. INTRODUCTION

Why do voluntourism activities involving children need to be regulated?

**“Volunteering is good. It’s the unregulated, unskilled volunteering for the purpose of tourism (voluntourism) with children that is not, but it can be made better”**

*- Ms. Mama Fatima Singhateh, the United Nations Special Rapporteur on the sale and sexual exploitation of children.*

**Professional volunteering** is organised with the primary objective of capacity building and facilitating skills transfer, quite often as part of formal international cooperation for development programmes and agendas.<sup>19</sup> Placements for professional volunteers are often initiated and determined by host government institutions and organisations, based on the pre-identified structural needs. Unlike voluntourism products, professional volunteering is not designed to cater to popular demand for certain touristic experiences. Such skilled professional volunteering should be clearly distinguished from voluntourism.

**Voluntourism packages involving children**, widely available on the market, are designed to offer short-term opportunities to tourists, who in general lack relevant skills and qualifications. As part of tourism packages, voluntourists may not be requested to undergo any background checks, although they enter in direct contact with children in various settings, including schools, orphanages, childcare centres, sports programmes, and other community projects. Voluntourism products with children are primarily designed to cater to the interests and desires of tourists in terms of experiences, rather than to serve the best interests of the children involved.

## Regulated Volunteering

- **Definition:** Structured programmes where skilled professionals address societal or environmental challenges.
- **Key Practices:**
  - **Skills Match:** Volunteers bring professional qualifications and expertise.
  - **Safeguards:** Includes background checks, child safeguarding policies, and community consultation.
  - **Focus:** Long-term capacity building and sustainable impact.
- **Why It's Important:** Creates meaningful change while ensuring the safety and dignity of children and communities.

## Unregulated Voluntourism

- **Definition:** Short-term tourism packages marketed as volunteering opportunities, often involving interactions with children from local communities.
- **Key Risks:**
  - **Lacks skills requirement:** Participants are not required to have the relevant skills or training, resulting in unqualified volunteers.
  - **No Safeguards:** Rarely includes background checks, leading to risks for children.
  - **Profit Over Impact:** Focused on the tourist experience rather than community needs or child protection.

**Why It's Harmful:** Puts children at risk and disrupts local development efforts.

**All forms of professional volunteering and volunteering activities in tourism** (voluntourism) need to adhere to the highest child protection standards. Professional volunteering has its own set of challenges; children can also be harmed, targeted or sexually exploited even though this type of volunteering is typically more structured. In all contexts that bring people into contact with children, including in volunteering as a part of official development assistance, good intentions are not enough - children's rights and best interest of the child need to be given paramount consideration in the development of all initiatives.

While the concept of voluntourism with children is globally marketed on noble intentions, it **raises significant concerns about the heightened vulnerability of children, particularly in regions lacking robust legal protection and effective child protection systems.** Voluntourism initiatives, which are often conducted without adequate regulation and supervision, pose inherent risks to the physical safety, well-being, as well as holistic educational and psychological development of children.

**The absence of safeguarding procedures in unregulated and unsupervised placements can result in direct and potentially harmful engagement, especially with children and communities in vulnerable settings.**<sup>20</sup>

<sup>19</sup> Learn more from the International Forum for Volunteering in Development: [International Forum for Volunteering in Development](#) and [Forum: Research Centre](#).

<sup>20</sup> Watch the visual: [What's the difference?](#) between regulated volunteering and voluntourism, and why it matters.

**The lack of stringent requirements, including supervision and criminal background checks for volunteers, also creates avenues for perpetrators.**

This may lead to the establishment of relationships and methods of contact that facilitate grooming and subsequent exploitation and abuse of children in destinations by perpetrators seeking access. At the same time, with many perpetrators being situational abusers, unregulated access to children is an important factor in abuse cases.

**Due to the informal and increasingly decentralised nature of voluntourism,**

the statistics on the scale and scope of the phenomenon is limited. The voluntourism market involves a wide range of travel and tourism companies, business, civil society, religious, sport, cultural and other organisations. It fuels the growth of tourism rather than creating lasting change for local communities. There is clear evidence that unregulated voluntourism is directly responsible for harming children and that it does not contribute to the sustainable development of the communities. A simple Google search for voluntourism products advertised on Internet websites by travel and tourism companies, tour operators and other organisations in origin and destination countries, demonstrates that this market responds to the trend of seeking localised and purposeful travel as an alternative to mass tourism, and offers a variety of “doing good” experiences that do not consider the real impact on children and communities.

**The voluntourism market can facilitate contact with children in diverse sectors and settings,** from schools and childcare centres or orphanages, to sports facilities, religious settings, festivals, business initiatives, private charity initiatives, and even programmes that work with children living in the streets. It can include both

formal activities and informal activities. In some cases, regulations may exist, but they do not cover all involved entities or reach down to the grassroots level, where voluntourism activities take place. For example, due diligence regulations of the European Union for business apply mostly to large companies, while voluntourism activities tend to be organised by smaller business or other organisations; therefore, regulating only large actors does not cover the target market. In addition, when national regulations cover voluntourism, they may exclude international contexts. The country case studies analysed below also demonstrate that regulations may be hard to implement if there are no mechanisms to reach, engage, monitor and act at the level where voluntourism activities actually occur, at local and community levels. The regulations or absence of such on voluntourism can also depend on the space granted to civil society organisations to operate in a given country, rather than being motivated by child protection concerns.

**The complexity of risks to children requires wide-ranging interventions at local, national, regional and international levels, led in cooperation with sectors, actors and stakeholders within and across origin and destination countries.**

## Key recommendations on regulating voluntourism

The key recommendations in this case study were informed by global, regional and local perspectives, and localised approaches. The global recommendations have been extracted from the abovementioned Global Call for Robust Child Protection Structures in Travel and Tourism and Thematic Brief on Volunteering, Voluntourism, Tourism and Trafficking in Orphanages, that was developed in partnership with civil society organisations working on the issue.

### The Global Call for Robust Child Protection Structures in Travel and Tourism

Based on the findings of the report on the sale and sexual exploitation of children in travel and

tourism, including a closer look at the phenomenon of voluntourism of the United Nations Special Rapporteur on the Sale, Sexual Exploitation and Sexual Abuse of Children, and input from authorities and advocates, a global call for responsible and regulated voluntourism practices was launched at the United Nations General Assembly 2023 in New York.<sup>21</sup>

The recommendations focused on the urgent need for collective action to regulate harmful forms of voluntourism through due diligence measures and “do no harm” policies and practices, so that children are not exploited for profit in the travel and tourism industry; a need for a global commitment to create sustainable travel and tourism, where voluntourism is regulated and children are protected, and to turn recommendations into actions for a world free of child sexual exploitation.

<sup>21</sup> ECPAT International. (2023). [Global Call for Robust Child Protection structures in Travel and Tourism.](#)

## Other recommendations from the report exhorted specifically to:

- **Create a regulated system of all forms of volunteering**, conduct thorough background checks on volunteers and provide training and support to ensure that they understand and respect the rights of children.
- **Strengthen existing laws** to address all forms of exploitation of children, including the sale, sexual abuse and trafficking of children in travel and tourism.
- **Work with organisations (business, non-governmental organisations, religious organisations, sport institutions, cultural event organisers and other) and intermediaries in the sector offering voluntourism** “products” and “packages” to closely regulate their operation and elaborate measures for the prevention of the commodification of children.
- **Support the redirection of private and public funding away from orphanages** and alternative care facilities towards provision of services, family-based care and critical aftercare services for young people in exiting care.
- **Promote and ensure a cross-sectoral approach**, including the role of international and regional bodies, the private sector, civil society and community actors that should work together to address and respond to the phenomenon of unregulated voluntourism with children, as part of sustainable and responsible tourism development.

## Thematic Brief on Volunteering, Voluntourism, Tourism and Trafficking in Orphanages

The Thematic Brief<sup>22</sup> was developed to provide guidance to governments, policy and decision-makers, to support implementation of international commitments made in the context of the United Nations General Assembly’s Resolution on the Rights of the Child focusing on children without parental care adopted in 2019.<sup>23</sup> It explains how to take appropriate measures to address and prevent the harms associated with orphanage volunteering, orphanage tourism and voluntourism and the orphanage trafficking connected to it.

➤ **It includes recommendations relevant to countries of origin and destination for volunteers.**

<sup>22</sup> Global Policy and Advocacy Working Group. (2023). Thematic Brief: Volunteering, Voluntourism, Tourism and Trafficking in Orphanages. Transforming Children’s Care Collaborative.

<sup>23</sup> United Nations General Assembly. Resolution adopted by the General Assembly on 18 December 2019 [on the report of the Third Committee (A/74/395)].

# KEY RECOMMENDATIONS ENCOURAGE TO:

- "Ensure criminal laws enable the prosecution of orphanage trafficking and exploitation offenses, including the unlawful removal of a child from parents or guardians and placement in a care facility for the purpose of exploitation or profit,<sup>24</sup>
- Criminalise the grooming of children under the age of 18 and trusted persons (parents, guardians, caregivers)<sup>25</sup> for child sexual exploitation purposes to facilitate both online and offline sexual exploitation by persons in positions of power, authority, or trust,
- Establish by law extraterritorial jurisdiction for all offenses of child trafficking, exploitation and grooming,<sup>26</sup>
- Establish enforceable child protection regulation for the travel, volunteering and tourism industry that includes a prohibition on orphanage volunteering and visits to orphanages, and regulation of other forms of voluntourism activities with or for children. Regulations should apply to all tourism and volunteering activities carried out within the country's territory, as well as to the activities conducted by domestically registered entities, including those implemented by third parties through supply chains. Penalties should be prescribed for infringements and focus on penalizing legal persons who facilitate and/or profit from orphanage tourism/voluntourism,
- Incorporate regulation on the use of volunteers and visitors in existing child protection, child welfare and alternative care regulations, and specifically prohibit visits to and volunteering within residential childcare facilities,
- Ensure there are child and youth-friendly reporting mechanism accessible to children in residential care and children and young people who have transitioned or aged out of care,<sup>27</sup>
- Establish sufficient not-for-profit sector regulation and ensure charitable activities comply with international child rights norms, safeguard children's best interests, and protect children from harm, abuse, rights violations and regressions."<sup>28</sup>

<sup>24</sup> These laws should impose criminal sanctions on perpetrators involved in the acts and purposes of orphanage trafficking. However, this does not extend to voluntourism, funding, or visiting an orphanage, which are considered "drivers" of orphanage trafficking rather than constitutive elements of the offense. For more information about the links and differentiation between orphanage trafficking, orphanage voluntourism and child institutionalisation see: Van Doore, Kate and Rebecca Nhep, 'Orphanage trafficking, modern slavery and the Australian response' (2019) 7(2) Griffith Journal of Law & Human Dignity.

<sup>25</sup> Grooming may involve cultivating a trusting relationship with a parent, guardian or caregiver of a child, referred to as a 'trusted person' for the purpose facilitating sexual abuse or exploitation with the child at a later date. Grooming offenses should acknowledge that trusted persons can also be victims of grooming and should criminalise grooming of trusted persons as a part of child grooming offenses.

<sup>26</sup> Extraterritorial jurisdiction when applied to criminal offences enables governments to prosecute their citizens or residents for criminal conduct committed wholly or partially abroad. This extended jurisdiction is crucial for preventing and prosecuting child exploitation and trafficking, particularly when barriers hinder effective prosecution in the countries where the crimes occur. Extraterritorial jurisdiction deters these crimes universally and prevents perpetrators from exploiting countries with weak rule of law or systemic challenges within their criminal justice systems.

<sup>27</sup> The mechanism should be accessible to their parents and trusted adults in their life as well.

<sup>28</sup> Global Policy and Advocacy Working Group. (2023). Thematic Brief: Volunteering, Voluntourism, Tourism and Trafficking in Orphanages. Transforming Children's Care Collaborative. 10.

## What are the recurring challenges in translating the recommendations to regulate voluntourism into action at country level?

To translate the global recommendation into practical approaches at country level, it is key to consider the decentralised nature of voluntourism that requires diverse entry points for regulation in each country context. The practical experiences highlighted in this case study illustrate the complexities involved in translating global recommendations into actionable models, with meaningful change often requiring significant time and sustained efforts.

Experiences from the countries that have taken steps to address the issue revealed also significant confusion among governments, businesses, and organisations in distinguishing between formal, professional volunteering and the unstructured, short-term voluntourism offerings marketed to individuals without professional qualifications. This underscores the need to establish clear definitions of "volunteering" and "voluntourism," accompanied by regulations for all forms of volunteering and voluntourism involving children. Such regulations should mandate stringent safeguarding procedures, with particular attention to voluntourism with children, which is particularly high-risk.

➤ **Voluntourism, despite being a popular segment of the domestic and international tourism market, poses significant risks to children's rights and must be regulated as part of broader child protection systems.**

As demonstrated in this case study, identifying effective entry points for regulation requires a thorough understanding of the specific legal and regulatory contexts in both origin and destination countries. This underscores the necessity of tailored approaches, as a one-size-fits-all solution is not applicable.

The challenges include the regulation of voluntourism activities provided by business and corporate entities. In destination countries, there is a general lack of mandatory measures for businesses, while in origin countries the due diligence laws and supply chain laws mostly apply to big corporations, leaving smaller tourism companies in the market out of reach. Voluntary measures, such as the Code's Voluntourism Policy,<sup>29</sup> have been observed by leading companies committed to keeping children safe,<sup>30</sup> but their limitations in terms of outreach need to be recognised as common to any voluntary initiative.

In several countries, efforts have focused on ending volunteering in orphanages, in the context of both formal volunteering for development programmes and voluntourism packages marketed by companies and organisations that currently operate without oversight.

➤ **While orphanages and other residential care centres<sup>31</sup> remain high-risk environments, progress has been made in curbing this form of volunteering and these efforts must continue.**

<sup>29</sup> [The Code's Voluntourism Policy.](#)

<sup>30</sup> [The Code Member companies.](#)

<sup>31</sup> Residential care is defined as overnight care provided in any non-family-based setting (Save the Children). There are numerous care settings that are included in the definition of residential care including orphanages, children's villages, children's homes, shelters and transit centres, group homes, institutions and in some cases boarding houses. Residential care may also be provided in faith-based settings such as churches, temples and pagodas.

However, other unregulated forms of voluntourism, such as activities in schools, sports clubs, daycare centres and similar settings, also require attention. These issues should be brought to the attention of relevant line ministries and regulatory bodies, including those responsible for education, sports and recreation, and children and youth affairs.

Additional challenges, beyond addressing the risk of sexual exploitation of children by domestic perpetrators in the context of national volunteering, include the establishing of effective international cooperation agreements between origin and destination countries to address the risks resulting from international voluntourism. These challenges are particularly evident in extraterritorial cases, where foreign perpetrators exploited children within unregulated voluntourism settings.

**Strengthening collaboration and regulatory frameworks is essential to address these complex issues and to curb the demand by preferential abusers,**

who actively seek unregulated avenues and spaces to exploit children domestically and abroad, as well as by travellers who may exploit children during their stay, whether it was their original purpose or because the circumstances allowed it.

While many countries have regulations governing formal volunteering with professional volunteers, voluntourism often falls outside these regulatory frameworks. This can be linked to the growth of localised experiences in the travel and tourism sector, involving small and non-formal enterprises and other actors who are not covered

by existing regulations which, when they exist, are usually designed for larger companies and operators. This creates significant gaps that expose children to the negative impacts of unregulated voluntourism activities and heighten their vulnerability to sexual exploitation. Addressing these gaps requires targeted regulations designed to manage the unique risks of voluntourism.



# 3. THE APPROACHES

## Voluntourism Regulation - a matter for international cooperation

Voluntourism is a globalised activity that crosses multiple State borders and legal jurisdictions. **No country can regulate voluntourism alone.** Protecting children in the context of voluntourism requires international cooperation, with both countries of origin and of destination for volunteers taking steps to regulate the aspects of the supply chain that fall within their jurisdiction.

The responsibility of the governments of origin and destination countries to regulate the issue of voluntourism arises from their obligations under international law. By ratifying the Convention on the Rights of the Child, governments commit to enacting appropriate domestic legislation, regulations, and mechanisms to respect, protect, and fulfil children's rights as outlined in the Convention. Regulating voluntourism falls under the State's obligation to "protect," which requires governments to prevent non-state actors, including individuals and companies, from interfering with children's enjoyment of their rights. This duty to protect has implications for domestic and extraterritorial regulation: domestically, governments must implement laws and regulations that protect children within their borders from any infringement on their rights due to the conduct of non-state actors operating in their territory, including domestic entities and overseas visitors. For voluntourism, this may include placing restrictions on certain volunteering activities and mandating criminal background checks for all volunteers working directly or indirectly with children. Extraterritorially, governments must enact laws that prevent their citizens and domiciled entities (such as companies registered in their country) from interfering with the rights of children in other countries through their actions overseas. This may involve regulation

that imposes child protection and minimum conduct standards for volunteers-sending organisations' overseas activities, travel restrictions for individuals convicted for sexual crimes against children, and extraterritorial jurisdiction for offences of sexual exploitation, allowing foreign governments to prosecute their citizens and residents for crimes committed whilst abroad.

**The combination of domestic and extraterritorial regulatory measures enacted by origin and destination countries results in comprehensive supply chain regulation of voluntourism through international cooperation.**

## No one-approach-fits-all - analysing the country landscape

The measures each government implements will vary according to its unique legal and regulatory landscape and whether the country primarily functions as voluntourism origin, destination, or dual-role country.

In each case, a multisectoral regulatory framework may be required to address all sectors and entities involved in the voluntourism supply chain.

**GIVEN THAT THERE IS NO “ONE SIZE FITS ALL”  
APPROACH, EACH COUNTRY’S STRATEGY FOR REGULATING  
VOLUNTOURISM SHOULD BE GUIDED BY A COMPREHENSIVE  
LANDSCAPE ANALYSIS THAT INCLUDES  
FIVE KEY COMPONENTS:**

- 1. Supply Chain Analysis:** Identifying the aspects of the voluntourism supply chain that fall within the country’s jurisdiction and regulatory reach.
- 2. Sector Analysis:** Identifying the sectors and stakeholders involved in voluntourism activities within the country’s jurisdiction that need to be covered by regulation.
- 3. Risk and impacts Analysis:** Identifying sector-specific risks and impacts to children (in all their diversities) associated with voluntourism activities and the sites where these risks occur.
- 4. Legal and Regulatory Framework Analysis:** Identifying the existing laws and regulations relevant to voluntourism supply chain segments and determining the gaps and opportunities for regulatory reform.
- 5. Sociocultural, Gender and Political Context analysis:** Identifying relevant context specific factors that may have influenced voluntourism, result in awareness of risks, or related reforms that can be leveraged to advance voluntourism regulation.

## Supply chain analysis

The voluntourism supply chain is made up of the following stakeholders:



Figure 1: Voluntourism Supply Chain

To regulate voluntourism, countries must first have clarity of which segments of the voluntourism supply chain and corresponding activities fall within their jurisdiction and responsibility. Destination providers, receiving organisations, host projects and voluntourists (for the duration of their stay in the country) fall within the jurisdiction of destination countries. Accordingly, these countries must regulate the activities and the conduct of stakeholders involved in these segments of the supply chain.

Voluntourism organisations, retailers, wholesalers, third

party brokers and voluntourists (in their capacity of citizens and residents) fall within the jurisdiction of origin countries. The governments of these countries are responsible for regulating the conduct and activities of stakeholders involved in these segments of the supply chain. The issue of regulating voluntourism needs to be addressed considering the complexity of the supply chains in travel and tourism, that reflect today's reality of travel in which several actors are involved across jurisdictions, such as digital booking platforms offering attractions and activities in local communities, or financial institutions that manage the payments.

## Sector analysis

Voluntourism activities span multiple sectors, each of which may have its own regulatory framework. Sectors can be disaggregated based on whether they are governmental, private or community-based and this affects the type of registration that the entities may have. Private sector entities are generally commercial in nature and are covered by corporate law and regulation. Community sector entities are generally non-for-profit and covered by not-for-profit laws and charity regulation. These regulatory frameworks are particularly relevant for origin countries and can be used to regulate the overseas activities of domestically registered corporations and charities.

Sectors can also be disaggregated by field, such as education, health, sports, cultural events, child protection and tourism. Each of these sectors also has its own regulatory framework that govern the activities and

services that fall within it, whether run by government agencies, companies or not-for-profit entities. This type of regulations often includes minimum standards, codes of professional conduct and registration and accreditation requirements for service providers.

**These regulatory frameworks are particularly important for destination countries, allowing governments to regulate the engagement of voluntourists in host projects that involve contact with children.**

## Risk and impact analysis

After conducting a sector-based analysis to identify all sectors involved in the voluntourism supply chain within the country's jurisdiction, a risk assessment should be carried out to identify how voluntourism may interfere with children's enjoyment of their rights in the context

of host projects or sites within each sector. The nature of the risk, the likelihood of its occurrence and the severity of its effects should inform the type of regulatory action to be taken to protect children from it.

### Measures should include:

- **Prohibitions:** Bans on volunteering activities that are detrimental to children or pose an unacceptable risk of harm. For example, prohibitions on orphanage volunteering and voluntourism should be included in child protection sector regulations, preventing residential care services from acting as host projects and accepting volunteers.
- **Restrictions:** Limitations imposed on specific types of volunteering activities to mitigate or minimise risks or interferences with children's rights. For example, voluntourism activities in schools may be restricted to extracurricular roles or teacher assistance to reduce the risk of disrupting children's education, which could occur if voluntourists regularly assume the role of classroom teacher.
- **Professional Standards:** Industry standards, accreditation, and qualification requirements that apply to volunteers, imposing an obligation on host projects to thoroughly vet voluntourists who engage in professional services with children.
- **Child Protection Standards:** Mandatory standards that set out requirements for criminal background checks, codes of conduct, and supervision requirements for all voluntourists who engage with children and other vulnerable groups.

## Legal and regulatory framework analysis

Once sectors and sector-specific risks have been identified, countries should conduct an analysis of their existing legal and regulatory frameworks to determine the relevant legal rules, regulations, and codes of conduct that apply to the sectors involved in voluntourism. This analysis should also identify the regulatory bodies and authorities responsible for enforcing these laws and regulations. Additionally, it should assess which risks identified in the risk analysis are adequately addressed by current laws and regulations, as well as identify any gaps that require new regulations or reforms.

Governments may choose to address these regulatory gaps in various ways, such as enacting specific regulations applicable to all entity types and sectors engaged in voluntourism activities, amending existing laws and regulations across the relevant sectors, or implementing a combination of both approaches.

## Sociocultural, gender and political analysis

Analysing the sociocultural and political landscape can help identify both barriers and opportunities that may shape the approach to pursuing regulatory reforms in the voluntourism sector. In many countries, cultural and historical factors have significantly influenced the development of voluntourism, making it essential to address these influences when implementing awareness-raising efforts and regulatory reforms. For example, **colonial legacies may continue to shape how voluntourism-origin countries perceive the role and value of volunteers**, resulting in reluctance to regulate or restrict these activities. It might also influence the perception of risks, misleading engaged actors in identifying what is safe or not based on the gender, nationality or ethnicity of the children and travellers. In voluntourism-destination countries, the close ties between aid, trade, and tourism may lead to hesitance in regulating voluntourism due to concerns about its impact on tourism revenue or foreign relations. These barriers must be considered and addressed to generate sufficient political will and public support for regulation. The issue of voluntourism therefore raises essential questions about the power dynamics that still exist between countries and represents an additional entry point for decolonisation efforts.

In some contexts, related issues that have been or currently are under scrutiny can serve as a catalyst for building political momentum toward regulating voluntourism. In many voluntourism-origin countries, connections have been drawn between orphanage voluntourism and historical decisions to phase out institutional care, alongside inquiries into systemic abuse within institutional care settings. These factors have contributed to strong political will for regulating orphanage voluntourism.



**In other cases, increased awareness of sexual exploitation of children in travel and tourism, modern slavery, and even terrorism financing through charities has spurred legislative and regulatory reforms, offering opportunities to incorporate provisions addressing high-risk voluntourism activities within not-for-profit and modern slavery legislation.**



## Which actors need to be involved?

There are several key actors who will need to be engaged and involved in strengthening voluntourism related legislation and regulation, however this will differ from one country to another, including both origin and destination countries. Engagement efforts should focus on 'change makers': key actors who can drive advocacy efforts within and across relevant sectors and government officials with powers to initiate, draft and propose new legislation, policies or regulation.

**This may include parliamentarians, ministers and directors or senior officials from relevant government ministries, departments and regulatory bodies including:**

- The ministry and/or departments in charge of **tourism**
- The ministry and/or departments in charge of **transport**
- The ministry and/or department in charge of **justice**
- The ministry and/or department in charge of **foreign affairs** (plus the embassies)
- The ministry and/or department in charge of **education**
- The ministry and/or department in charge of **child protection**
- The ministry and/or department in charge of **culture**, cultural and religious events and festivals
- The ministry and/or department in charge of **sports**
- The ministry and/or department in charge of **taxation**
- The ministry and/or department in charge of **immigration**
- The ministry and/or department in charge of **finance**
- Corporate and **financial regulators**
- **Charity/Nonprofit sector regulator**
- **Formal volunteering regulators** and coordinating departments/agencies
- **Local governments/councils** in key tourist areas (in highly decentralised countries)

**For awareness raising and advocacy purposes, it may be helpful to involve representatives from sectors involved in voluntourism who will be impacted by regulation, including from:**

- **Businesses offering voluntourism**
- **Travel and tourism associations, councils and standard setting/certification bodies**
- **Faith-based** sector, including religious leaders and organisations
- **Education** sector
- **Cultural** organisations and sector
- **Sport** organisations and settings

When advocating for and promoting newly enacted voluntourism regulations, it is beneficial to identify and engage with representative associations, sometimes known as umbrella groups, apex or peak bodies, that represent the interests of companies and organisations involved in voluntourism activities. These associations are often found within the tourism industry, international development, charities sector, and among groups of churches or religious organisations. In some countries, there are also representative associations for privately run children's homes (orphanages) and volunteering organisations.

These associations play a crucial role in liaising with the government, disseminating information, setting standards, and socialising new laws, regulations, and policies within their sectors. This is important because government-employed personnel, including employees of international institutions, diplomats or peacekeepers, may also engage in voluntourism activities with children, including outside of their formal roles. In some cases, the associations are involved in enforcing codes of conduct, which are often imposed as a condition of membership to the individual organisations.

**Engaging with such bodies can facilitate smoother implementation and broader acceptance of voluntourism regulation, as these associations can help bridge the gap between policymakers and stakeholders.<sup>32</sup>**

<sup>32</sup> See the reference to PhilCV (the volunteering for development peak body in the Philippines) in the Philippines case study for an example.

# HARMS OF ORPHANAGE VOLUNTOURISM AND OTHER FORMS OF VOLUNTOURISM ON CHILDREN

Orphanage voluntourism is a popular activity within the voluntourism sector, documented in over 37 countries.<sup>33</sup> It facilitates contact between vulnerable children, removed from the protective environment of their families, and a continuous stream of unqualified volunteers, many of whom are inadequately screened or supervised. This practice is associated with numerous harms. It sustains institutional care, an outdated model known to negatively impact children's physical, emotional, and psychological development. It exacerbates the psychological harm caused by institutionalisation, as children endure repeated cycles of forming and breaking bonds with short-term volunteers, depriving them of the stable, caring relationships that are essential for optimal development. Furthermore, orphanage voluntourism provides opportunities for repeat offenders and situational offenders to access highly vulnerable children, heightening the risk of sexual abuse and exploitation. It also incentivises the recruitment and harbouring of children in institutions to attract and gain profit from volunteers and visitors' donations, a practice recognised as 'orphanage trafficking.'

Given the severity and scope of these risks, orphanage voluntourism has been the subject of global calls for prohibition. This case study reflects these calls, advocating for the inclusion of explicit bans on orphanage voluntourism and child protection regulations worldwide.

Other forms of voluntourism with children, including in schools, faith-based organisations, sport or childcare centres, disrupt educational process and negatively affect children's wellbeing as the result of their commodification as "tourism attractions". They also impact the welfare of the entire communities, posing additional risks to the safety and protection of children.

<sup>33</sup> Better Care Network. (2018). Orphanage Tourism Research. New York.

## 4. BUILDING SYSTEMIC RESPONSES - COUNTRY EXPERIENCES

This chapter presents concisely **practical experiences and examples by groups of voluntourism origin and destination countries** reflecting how they approached, or how civil society organisations advocated in their countries for the regulation of the issue. The responses consider the landscape analysis discussed above, which

includes the five key components of supply chain, sector, risk and impacts analysis, legal and regulatory framework analysis, and sociocultural and political contexts considerations.

### How have the destination countries approached the regulation of voluntourism?

This chapter presents experiences from Cambodia, Philippines and Sri Lanka. The three ECPAT member organisations from these countries collaborated with ECPAT International on the project “Strengthening Child Protection System in the Travel and Tourism Context”

that aims at improving child protection measures on regulating voluntourism to develop actionable and replicable models in other countries. This chapter also includes an analysis of approaches to address the issue of voluntourism with children by ECPAT Indonesia.



### REGULATING VOLUNTOURISM: CAMBODIA CASE STUDY

Cambodia is one of the most popular voluntourism destinations, with a wide array of short-term unskilled volunteering experiences on offer for tourists, including construction, English teaching, environmental conservation, temple preservation, sports coaching, childcare, health care, community development and volunteering in local schools, early learning centres, churches and pagodas. While voluntourism is facilitated as a for-profit activity by private sector companies it has also become an effective way for local non-governmental organisations and associations in Cambodia to attract and retain foreign donors, providing them with a tangible hands-on way to contribute beyond financial support.

The voluntourism supply chain in Cambodia includes destination providers (private sector tourism companies), receiving organisations (typically local non-governmental organisations and associations), host projects (run by organisations and community groups), and voluntourists. While some destination providers and receiving organisations directly advertise and sell voluntourism products in-country and online, most form part of the supply chain of overseas companies that market and sell experiences in voluntourism-origin countries.

## Sectors involved in voluntourism in Cambodia include the private sector, community sector, education, rural development, tourism, child protection and the healthcare sector. Government Ministries with regulatory responsibility over these sectors include:

- The Ministry of Interior: responsible for the registration and regulation of non-government organisations and associations.
- The Ministry of Tourism: responsible for regulating tourism activities, including community-based tourism.
- The Ministry of Education: responsible for licensing and standard setting for all education providers.
- The Ministry of Social Affairs, Veterans and Youth: responsible for child protection and child welfare, including regulating private services and enforcing child safe organisation standards.
- The Ministry of Health: responsible for licensing all health care providers and professionals.
- The Ministry of Cults and Religions: regulatory responsibility for churches and pagodas.

## Addressing Child Exploitation in the Tourism Sector

The sexual exploitation of children in the travel and tourism industry was the key tourism-related risk to children to be raised and addressed by the Ministry of Tourism with civil society and United Nations' agencies support. In 2000, the Ministry of Tourism launched the Child Safe Tourism Programme in partnership with World Vision and ECPAT's Child Wise Tourism Project. This project aimed to address the risks of sexual exploitation of children in Cambodia's rapidly growing tourism sector. By 2005, a new partnership with the International Labor Organisation saw the programme expand its focus to also address child labour and trafficking in the tourism industry. A National Child Safe Tourism Commission was established in 2001 along with three provincial commissions in key tourism areas. In 2008, the Minister of Tourism endorsed a Strategic Plan on the Promotion of Child-Safe Tourism to Prevent Trafficking in Children and Women for Labour and Sexual Exploitation in the Tourism Industry. Supporting operational guidelines were also developed, focusing on labour protections, tourism regulations, and social protection services for children identified as victims of exploitation or child labour.

In 2006, public awareness campaigns on child exploitation in travel and tourism began with media campaigns and widespread dissemination of printed materials advocating for child safe tourism. Training sessions were conducted for key industry associations, including the association for travel agencies, hotels,

guesthouses and restaurants, non-governmental organisations, and the inter-trade union women's committee. A hotline was established, and stakeholders and community members were encouraged to report any suspicions or concerns of child exploitation. Specialised monitoring teams were formed, responsible of monitoring labour conditions in tourism venues and travel and tourism related businesses' compliance with tourism regulations.

In 2005, Friends International launched the Child Safe Movement, a grassroots initiative designed to engage actors from various sectors as child-safe agents. The movement focused on training these agents to safeguard children and report any concerns. It specifically targeted the tourism industry and voluntourists, raising awareness about the risks of sexual abuse and exploitation in these areas. Additionally, the movement promoted ethical volunteering practices, actively combating harmful forms of voluntourism that endangered children.

In 2010, The Guardian published an article highlighting the rapid proliferation of residential care institutions in Cambodia, particularly unregistered ones, and linking this surge to the growing popularity of orphanage tourism.<sup>34</sup> Research into this practice revealed instances of child abuse, appalling living conditions, financial misconduct, as well as trafficking, labour, and sexual exploitation within these institutions. Furthermore, the demand for orphanage voluntourism experiences incentivised the recruitment and unlawful removal of children from their families. These children were falsely portrayed as orphans to voluntourists, who were encouraged to pay or donate in exchange for visits or volunteer opportunities.

In response to these concerns, Friends International and UNICEF launched the "Children are Not Tourist Attractions" campaign in 2011, raising awareness about the harms of orphanage tourism. In 2014, the Ministry of Tourism and World Vision launched a new Child Safe Tourism Campaign, also including a focus on the risks to children associated with orphanage tourism and discouraging its practice. APLE Cambodia and World Vision also engaged in extensive engagement with the tourism sector, raising awareness of the signs of child abuse, ethical engagement with children in tourism, the legal framework for child protection and how to report concerns of child abuse and exploitation. This initiative was implemented in six key tourist areas across the country.

Also in 2014, APLE Cambodia analysed child sexual abuse and exploitation in institutions in Cambodia, highlighting the involvement of various individuals, including foreign nationals, volunteers, donors, and institution founders. The analysis indicated a significant correlation between voluntourism and abuse and revealed patterns of exploitation where individuals, leveraging their association with institutions through founding, donating, or volunteering, take advantage of their roles to abuse children. This includes cases where convicted sex offenders were allowed to have unsupervised access to children due to inadequate child protection measures within these institutions. As awareness of the harms associated with orphanage tourism has grown, APLE Cambodia and local authorities have observed a shift in behaviour. Tourism companies and voluntourists seeking direct contact with children are increasingly turning to community-based visits to avoid scrutiny. This highlights the importance of not only addressing orphanage tourism through appropriate prohibitions but also ensuring that all forms of voluntourism involving children are adequately regulated to capture emerging trends and shifts in practice.

Cambodia has taken significant steps in improving its child protection regulatory framework. A raft of new regulations has been enacted which improves oversight over residential care services, mandating registration of all residential care institutions, regular inspection and adherence to minimum standards. Cambodia's recently amended Alternative Care Policy establishes a clear priority on prevention of separation, family-based care such as kinship and foster care, and the progressive elimination of institutional care. Small-scale residential care facilities that provide individualised care in an environment as close to a family as possible are included as an option of last resort, to be used temporarily and only when family-based care options have been exhausted. Residential care institutions are not permitted to recruit or admit children without the involvement of mandated child protection authorities responsible for assessment and decision making. However, none of the existing child protection regulations include provisions to regulate voluntourism with children or prohibit orphanage tourism.

Organisations providing social services, including child welfare services, are required to register and have a Memorandum of Understanding with the Ministry of Social Affairs, Veterans and Youth, which is contingent upon completing child-safe organisation training. However, this does not include restrictions or provisions for volunteers. Approximately half of all residential care institutions still in operation are unregistered and do not have a current Memorandum or accreditation from the Ministry.

## Current Legislation and Regulation

The Tourism Law 2009<sup>35</sup> is the primary legislation governing tourism in Cambodia. The law sets out categories of tourism businesses and licensing requirements. It includes provision for regulation setting out classification systems for tourism services, codes of conduct, and standard setting. However, the law does not include voluntourism companies as a type of tourism business nor voluntourism or volunteering as a tourism activity. As such there is no provision under the law to regulate voluntourism actors or activities.

**A new Child Protection Law, designed to harmonise existing laws and address identified gaps in protections for children, is currently being negotiated.**

<sup>34</sup> Ian Birrel. (2010). [Before you pay to volunteer abroad, think of the harm you might do. The Guardian.](#)

<sup>35</sup> Ministry of Tourism. (2009). [Law on Tourism.](#) Kingdom of Cambodia

APLE Cambodia is advocating for specific provisions within the Child Protection Law to regulate voluntourism with children and establish a prohibition on volunteering with children in residential care institutions.

In the education sector, there are various laws, regulations and national strategic plans to bolster the quality of education across the country. However, there are no existing provisions for regulating voluntourism with children in schools, early learning centres, day care centres or sports clubs, which all fall under the regulatory oversight of the Ministry of Education, Youth and Sport.

In 2018, regulations mandating child protection policies in Buddhist pagodas were introduced.<sup>36</sup> These regulations require mandatory child protection training for all persons involved in pagodas, set out a reporting mechanism for any concerns, suspicions or allegations of child abuse, and require that all adults involved with pagodas, including volunteers, sign a child protection code of conduct. Whilst this is a positive step towards making pagodas safer places for children, the regulations do not impose any restrictions on voluntourism activities, including orphanage tourism, despite many pagodas currently provide residential care for vulnerable children.

## Visas

Cambodia does not have a specific visa category for volunteers, nor is there clear guidance on the appropriate visa for visitors intending to volunteer. Many voluntourists enter under the tourism visa, or E-visa, typically intended for employment or business activities. The E-visa can be obtained on arrival for a 30-day stay without requiring any documentation or screening. Employer documentation is only necessary when applying for an extension, making this relevant only to long-term volunteers entering unpaid employment type arrangements.

## Voluntary Standards

The tourism sector in Cambodia has made some progress through engaging business in voluntary initiatives like The Code of Conduct for the Protection of Children from Sexual Exploitation in Travel and Tourism (The Code).<sup>37</sup> However, more efforts are needed to build a sense of responsibility within the sector to build sustainable tourism destinations with child protection at the core. The Code's Voluntourism Policy, which was co-developed among other partners with APLE Cambodia, sets out child protection standards for travel and tourism companies. This policy discourages orphanage voluntourism and highlights the negative impacts of voluntourism with children, redirecting business to positive solutions they can take to support local communities. The landscape analysis conducted by APLE revealed that

**while efforts have been made to raise awareness of the risks that voluntourism poses to children and to encourage voluntary regulations by business, the country lacks appropriate regulations for business to safeguard children and stop harmful forms of voluntourism, such as orphanage tourism.**

<sup>36</sup> Ministry of Cults and Religion. (2018). *Policy on Wat Sagnkahak Komar*. Kingdom of Cambodia.

<sup>37</sup> *The Code* (short for The Code of Conduct for the Protection of Children from Sexual Exploitation in Travel and Tourism) is a voluntary set of criteria that members commit to, to keep children safe.



# REGULATING VOLUNTOURISM: THE PHILIPPINES CASE STUDY

Voluntourism has grown in popularity in the Philippines with activities such as community development, environmental conservation, sports and recreation, health care, and activities involving children and youth, including teaching in schools and orphanage voluntourism. The voluntourism supply chain includes companies that advertise voluntourism experiences online, intermediaries/brokers that link international voluntourists to local organisations, tour guides and destination providers that facilitate placements, and local non-governmental organisations, grassroots organisations, community groups and faith-based organisations that may directly negotiate voluntourism opportunities with tourists. Voluntourists come from a range of countries, most notably the United States, Australia, United Kingdom, Germany, France, Japan and South Korea. Stakeholders involved in discussions in the Philippines identified risks to children associated with voluntourism activities that allow direct contact between children and tourists include abuse, grooming, and sexual exploitation. Children in residential care institutions exposed to orphanage tourism are further exposed to the risks of psychological harm, with repeated interactions potentially exacerbating attachment disorders.

In early 2024, ECPAT Philippines conducted a landscape analysis to better understand the state of voluntourism in the country. Interviews were conducted with key representatives from government and the private sector, including tourism boards and travel agencies. The analysis aimed to identify both past and current efforts to raise awareness of voluntourism-related risks to children, as well as existing mechanisms for regulating voluntourism practices to safeguard children. While all stakeholders noted the absence of an effective regulatory framework specific to voluntourism, they also identified several mechanisms and opportunities that could be leveraged to develop voluntourism regulation moving forward. These efforts and opportunities are summarised below.

## Advocacy and Awareness Raising

Efforts to address the broader issue of child exploitation in travel and tourism in the Philippines began in 2006 with the Department of Tourism's Child Wise Tourism Program. Part of a broader initiative put in place by the Association of Southeast Asian Nations to combat child sexual exploitation in the travel and tourism sector, the programme included training and awareness campaigns for service providers, delivered by ECPAT Philippines as one of the accredited trainers of the Department of Tourism. In 2014, the Department of Tourism further partnered with the ChildSafe Movement, updating the Child Wise Tourism program into the Child Safe Tourism program. This included the delivering of training sessions and campaigns, such as the "7 Tips for Tourists" campaign, which promoted child-safe tourism, including a specific focus on volunteering practices and educating tourists about how to spot and report suspicions or concerns of child sexual exploitation via the national human trafficking hotline.

In 2019, the Department of Tourism further updated the program launching the TourISM WoRCS Program,<sup>38</sup> consisting of a series of training sessions and seminars, primarily conducted by ECPAT Philippines, aimed at fostering sustainable tourism practices that protect the rights of children and women. The Program also seeks to establish "child-safe and women in tourism" focal persons in every regional office.

## Formal Volunteering Regulation

The Philippines has established a robust and highly regulated framework for formal volunteering, encompassing both domestic and international volunteering programmes. The framework is overseen by the Philippine National Volunteer Service Coordinating Agency, governed by Act No. 9418 on Strengthening Volunteerism<sup>39</sup>.

<sup>38</sup> Department of Tourism. (2019). [DOT launches TourISM WoRCS to combat children, women's abuse](#). Philippines.

<sup>39</sup> Philippine National Volunteer Service Coordinating Agency. (2006). [Republic Act No. 9418](#). Republic of the Philippines.



## The Coordinating Agency maintains a register of domestic volunteers and manages the International Volunteering Programme,

which places skilled international volunteers with government agencies, academic institutions, and non-governmental organisations within the Philippines. This programme collaborates with approved foreign volunteer sending organisations from volunteer-origin countries that have well established, rigorous recruitment and screening policies, most of which are funded by governments as part of official overseas development assistance programmes.

The Coordinating Agency's responsibilities include receiving and processing requests for foreign volunteers, coordinating with accredited foreign volunteer sending organisations to screen and match volunteers with approved roles, granting special visas for these international volunteers and co-implementing the Philippine Standards for Volunteering for Development with the Philippines Coalition on Volunteering, which are applicable to all approved volunteer involving and engaging organisations.<sup>40</sup>

While these Standards are based on the Global Standards for Volunteering for Development, they diverge from them by allowing volunteering in orphanages, which is instead prohibited in the latter. The Coordinating Agency is also responsible for measuring the contribution of volunteers to national development and efforts towards the Sustainable Development Goals, lobbying for volunteerism related policies, developing and monitoring the Corporate Volunteering Guide and facilitating knowledge sharing.

## Voluntourism

Voluntourism is classified as a tourism activity and thus falls under the oversight of the Department of Tourism rather than the Philippine National Volunteer Service Coordinating Agency. The primary law governing tourism, Republic Act No. 9593,<sup>41</sup> outlines several state obligations and objectives, including the mandate to ensure that tourism development promotes the welfare of all Filipinos and prevents the exploitation of women and children within the sector. The Act also established the Office of Tourism Standards and Regulation, responsible for creating and enforcing regulations, standards, and accreditation mechanisms for tourism enterprises. However, voluntourism is not specifically mentioned in the Act, and voluntourism

providers are not explicitly listed among the tourism enterprises subject to regulation. Consequently, no regulations or standards currently govern the operations of voluntourism companies, nor is there a policy outlining restrictions on voluntourism activities that may pose risks to children.

In 2022, the Department of Tourism commissioned a study titled "Managing Voluntourism: Towards Enriching and Responsible Voluntourism in the Philippines," through the Asian Institute of Tourism.<sup>42</sup> The study provided insights and recommendations for the government in developing voluntourism offerings. The study emphasised the importance of engaging destination communities throughout the process and highlighted the need to establish parameters to structure voluntourism and address its potential impacts. The study led to the development of a voluntourism training module which outlines the four endorsed types of voluntourism: cultural/ heritage conservation, sustainable farming, environmental conservation, and community resilience. The training module prohibits volunteering activities directly involving children and includes child protection guidelines for voluntourists that are to be implemented by local stakeholders in the communities where voluntourism takes place. ECPAT Philippines' pre-existing relationship with the Department of Tourism as a formal training partner under the TourISM WoRCs Program, provided them with an opportunity to contribute towards the development of this module. ECPAT Philippines advocated for voluntourism products with children to be excluded from the government's endorsed forms of voluntourism set out in the module. They also provided input into the development of the child protection components of the voluntourism training module. The Department of Tourism also advised that existing child protection laws and structures at the local government unit level should be strengthened to address risks of sexual abuse and exploitation of children within the voluntourism context.

## Identifying Entry Points

Following a comprehensive landscape analysis and consultations with the Department of Tourism, ECPAT Philippines decided upon a dual strategy to advocate for the regulation of voluntourism activities involving children. This approach focused on enhancing the voluntourism training module and supporting local government units to draft and enact ordinances designed to protect children in the context of travel and tourism, including voluntourism, in key tourism areas. The strategy capitalises on existing policy and regulatory reforms within the tourism sector and acknowledges the highly decentralised structure of Philippines, which requires local government units

<sup>40</sup> Philippine National Volunteer Service Coordinating Agency. (2022). PNVSCA Renews Memorandum of Understanding with PhilCV. Republic of the Philippines - National Economic and Development Authority.

<sup>41</sup> Department of Tourism. (2009). Republic Act No. 9593. Republic of the Philippines.

<sup>42</sup> Note: unpublished study.

to implement national laws and policies within their jurisdictions through local ordinances. Addressing the risks of voluntourism to children through local ordinances strengthens implementation by embedding monitoring and enforcement responsibilities within local child protection mechanisms. This approach establishes a practical framework for regulation, oversight, and accountability, effectively addressing the limitations of enforcement by the Department of Tourism, whose structure does not extend to the local community level.

## Voluntourism Training Module

The findings from the study commissioned by the Department of Tourism: “Managing Voluntourism: Towards Enriching and Responsible Voluntourism in the Philippines”, informed the creation of a voluntourism training package that defines the types of government-endorsed voluntourism offerings and includes child protection training as part of the TourISM WoRCs Program. ECPAT Philippines collaborated closely with the Department of Tourism to develop the voluntourism training module while advocating for the exclusion of child-focused voluntourism from permitted activities. During the pilot phase, the module was delivered to selected local government units, with an evaluation currently underway. Upon completion, it is anticipated by the Department of Tourism that the module will be endorsed as the national voluntourism framework, after which it will be made available to interested units, building their capacity to oversee voluntourism development in their areas. As per the Department of Tourism’s advice, the units will be responsible for strengthening local child protection mechanisms and enacting and implementing local ordinances to regulate voluntourism entities and activities, while also enforcing national child protection, anti-human trafficking, and tourism laws in relation to voluntourism.

Upon formal adoption of the voluntourism training module as a national framework, there are two anticipated outcomes. First, voluntourism companies in the Philippines will in effect be prohibited from facilitating child-related voluntourism activities, as these fall outside of permissible, government endorsed voluntourism offerings. Accordingly, high-risk forms of voluntourism such as orphanage tourism, and voluntourism in schools, daycare centres, and other children’s services will be prohibited. International volunteers wishing to work with children will be required to follow the formal, highly regulated volunteer pathway, adhering to the Philippines Standards for Volunteering for Development. Additionally, approved volunteer-receiving organisations must comply with sector-specific regulations and codes of conduct, such as the Department of Education’s Child Protection Policy or the Department of Social Welfare’s Minimum Standards of Residential Care, which include provisions for managing volunteers.

Second, the adoption of the voluntourism training module as a national framework is anticipated to prompt the development of specific voluntourism standards by the Department of Tourism’s relevant standards-setting office. While this process may take time, it is expected to culminate in a comprehensive framework for regulating voluntourism, with clear prohibitions on activities that place children at risk.

## Local Government Ordinances

At the local government level, ECPAT Philippines has worked with 13 local government units to advocate for and support the drafting of local ordinances against sexual exploitation of children in travel and tourism. Once ratified by the local Chief Executive, these ordinances will be implemented by the Provincial Committee Against Trafficking and Violence Against Women and Children and by the Local Council for the Protection of Children—two primary bodies mandated to oversee child protection.

➤ **These ordinances provide an actionable model that other local government units receiving voluntourism training can follow, showcasing effective local regulations to protect children involved in voluntourism activities.**

➤ **Working at the local government level in parallel to the national level is key to enhancing effective implementation, considering the decentralised governance structure of the Philippines.**



# REGULATING VOLUNTOURISM: SRI LANKA CASE STUDY

In Sri Lanka, efforts to improve voluntourism regulation began in 2022 with a stakeholder engagement process aimed at establishing a baseline understanding of voluntourism and its associated risks to children. This process involved identifying key actors across government and civil society, conducting interviews, and organising a National Consultation on Child Protection in Voluntourism, led by PEaCE - ECPAT Sri Lanka. These initiatives facilitated an internal mapping and analysis of the voluntourism sector, including risk and impact assessments, as well as evaluations of the existing legal and regulatory frameworks. Additionally, key countries that send voluntourists to Sri Lanka were identified. Voluntourism is gaining popularity in Sri Lanka, with an estimated

**25-30%**  
OF TOURISTS SEEKING TO INCORPORATE  
VOLUNTOURISM ACTIVITIES INTO THEIR TRIPS.

The majority of international voluntourists, as analysed by PEaCE - ECPAT Sri Lanka, come from Western countries such as the United Kingdom, Germany, the Netherlands, the United States, Canada and Australia. A smaller portion of voluntourists originate from Asian countries, including India, China, Japan and Hong Kong. Voluntourism in Sri Lanka is most popular among young people between the ages of 17- 22 years old, and it also involves national volunteers. Voluntourism activities span several sectors, including education, child protection, environment, rural development and health. The most popular voluntourism activities include teaching English, volunteering in schools, day care centres and orphanages, farming, community development and environmental conservation. Organisations recruiting and receiving voluntourists include not only businesses,

such as private companies, but also civil society organisations and religious organisations.

## Voluntourism Risks

Stakeholders' engagement through consultations led by PEaCE - ECPAT Sri Lanka and key informant interviews have identified several risks to children associated with unregulated voluntourism activities. Among the most harmful practices is orphanage voluntourism, which fuels the growth of orphanages, negatively impacts child development and exposes children to trafficking and sexual exploitation. Children may be groomed, as the emotional bonds that develop between voluntourists and children can lead to sexual exploitation and abuse. This confirmed the findings of a child rights risk assessment in Sri Lanka's accommodation and tourism industry conducted by Save the Children. The assessment highlighted the risk of sexual exploitation of children associated with voluntourism.<sup>43</sup>

Voluntourism also presents risks to local communities, through other activities such as tourism in urban poverty settlements so called "slum tourism" or voluntourism projects that prioritise the interests and experiences of voluntourists over the sustainable development needs of the communities. Such projects can undermine local development efforts, misrepresent communities, and perpetuate harmful stereotypes and power dynamics, ultimately leading to further marginalisation of the local communities while exposing children to risk of exploitation. The intersection of gender, age, poverty, ability status, among other factors, can further exacerbate these risks and increase children's exposure to harm.

PEaCE - ECPAT Sri Lanka called for all stakeholders to work closer together - the government, private sector, child protection institutions, and policy makers - to regulate voluntourism and prevent its negative impacts on children.<sup>44</sup> The National Consultation led by PEaCE - ECPAT Sri Lanka revealed significant gaps in some stakeholders' understanding of the risks posed by voluntourism activities to children. Notably, some practices such as orphanage voluntourism, which have been subject to international calls for prohibition, were still being facilitated by large organisations managing identical care institutions, as well as certain government officials.

<sup>43</sup> The Centre for Child Rights and Business. (2024). [Research Report: An Assessment of Child Rights Risks in Sri Lanka's Accommodation and Tourism Sector](#). Save the Children Sri Lanka.

<sup>44</sup> See the video intervention: [Interview with Mohammed Mahuruf: Voluntourism in Sri Lanka](#) held at the Regional Workshop for South Asia on the Collective Action to end the sexual exploitation of children. Kathmandu, Nepal, 2024.

This highlights the urgent need for more awareness-raising efforts and national campaigns aimed at increasing knowledge about the risks and detrimental impacts of voluntourism involving children, in addition to clear regulations. Such initiatives are essential to shift perceptions and foster stronger protection systems for all children, as well as to take an intersectional approach looking at how different children can be exposed to risk situations.

## Formal Volunteering Framework

The Ministry of Primary Industries and Social Development introduced a National Policy on Volunteerism in 2021,<sup>45</sup> aiming to promote, enhance, and improve coordination for volunteering across the country. This policy includes provisions for establishing a National Volunteering Secretariat and a quality assurance mechanism to ensure that volunteering work meets established quality standards. While voluntourism is not explicitly mentioned in the policy, "overseas volunteers" and "international volunteers" are included within the scope of the policy and subject to clearance and approval from State authorities. This indicates that the policy primarily addresses formal volunteering rather than voluntourism. However, the lack of a clear definition of volunteering within the policy makes it difficult to distinctly differentiate it from voluntourism activities. The policy introduces a provision for the government to enact legislation on volunteerism, providing a key opportunity to advocate for the inclusion of strong child protection and safeguarding measures.

In August 2022, the Cabinet of Ministers issued a Decision prohibiting international volunteers from volunteering in child development centres (residential care services) whilst still permitting local volunteering.<sup>46</sup> Although this Decision was limited to the formal volunteering framework, it is an important precedent that can be leveraged for similar prohibitions in voluntourism.

The Immigrants and Emigrants Act<sup>47</sup> serves as Sri Lanka's primary legislation governing immigration, detailing provisions related to visas and visa regulations. Two resident visa categories are particularly relevant to volunteers: the Education Category, which allows for volunteering as an acceptable activity, and the Personnel Attached to an NGO or INGO Category, designated for international volunteers working with registered (international) non-governmental organisations. Both visa categories require a request to be submitted by the volunteer-receiving organisation and must be coupled with a recommendation from the relevant line ministry (volunteers under the education category); the NGO Secretariat via the Ministry of Defence (volunteers at local organisations); or the Ministry of Foreign Affairs/Department of External Resources (volunteers at international organisations).<sup>48</sup> However, there is no specific visa category for voluntourists engaged in unskilled or short-term voluntourism activities. Many voluntourists enter Sri Lanka using the 'visit visa types', even though engagement in paid or unpaid employment is prohibited under these visa types, and volunteering is not explicitly mentioned as a permissible activity.<sup>49</sup>

## Voluntourism

The Sri Lanka Tourism Development Authority is the governmental body responsible for the planning, development, regulation, and implementation of policies related to tourism and related industries in Sri Lanka. The Tourism Act 2005<sup>50</sup> serves as the primary legislation governing tourism activities. However, this Act does not provide measures for the regulation of voluntourism activities with children which, especially post-COVID, has become a growing sector. The Act is now considered as in need of revision to address the rapid transformations within the tourism industry.

Discussions initiated by the former Prime Minister in 2018, in collaboration with the private sector and civil

society organisations, included both aspects of promoting and regulating voluntourism. These conversations aimed to encourage certain forms of voluntourism as a means of boosting foreign exchange. However, these conversations stalled with the change in leadership, leaving the issue of voluntourism regulation unresolved. More recently, and as a part of the USAID Indo-Pacific Opportunity Project promoting inclusive and sustainable economic growth, voluntourism has been proposed as a category of niche tourism products to diversify the tourism sector. Research was conducted by the International Development Group on the Sri Lankan tourism landscape, and it involved focus groups and stakeholder consultation with tourism authorities, experts and enterprises already operating in niche tourism areas that are currently unrecognised and unregulated.

<sup>45</sup> Ministry of Primary Industries and Social Empowerment. (2021). [National Policy on Volunteerism Sri Lanka](#). Sethsiripaya, Battaramulla, Sri Lanka.

<sup>46</sup> News.lk - The Government Official News Portal. [Cabinet Decisions - 15.08.2022](#).

<sup>47</sup> Department of Immigration and Emigration. [1948 No. 20 Immigrants and Emigrants Act and Amendments](#). Sri Lanka.

<sup>48</sup> Department of Immigration and Emigration. [Residence Visa](#). Sri Lanka.

<sup>49</sup> Department of Immigration and Emigration. [What are the general conditions on the Visa approval? Notice](#). Sri Lanka.

<sup>50</sup> The Sri Lanka Tourism Development Authority. (2005). [Tourism Act](#).

The research culminated in the development of the report *USAID Indo-Pacific Opportunity Project (IPOP) - Sri Lanka Tourism and Sustainability Activity: Recommendations for Proposed New Sustainable Niche Tourism Categories in Sri Lanka*.<sup>51</sup>

➤ **The report recommended for Sri Lanka to formally develop niche tourism as a component of the tourism sector, with 12 niche tourism categories identified for development, including voluntourism.**

The report also proposed the Sri Lanka Tourism Development Authority to develop registration criteria for niche tourism to encourage and enable enterprises involved to register with the tourism authority. If adopted, this recommendation will provide an avenue for the registration and regulation of voluntourism. Work remains to be done to seize this opportunity and ensure that registration criteria include appropriate safeguards for voluntourism activities with children, including prohibitions on high-risk activities such as orphanage voluntourism.

The Sri Lankan Government has acknowledged the risk of child abuse in the tourism sector and has tasked the National Child Protection Authority with engaging all relevant stakeholders and sectors involved in tourism to mitigate these risks. In fulfilling this mandate, the National Child Protection Authority established the Forum for Child Protection in Travel and Tourism, which brings together key government departments, corporate sector representatives, civil society actors and child protection stakeholders. PEaCE - ECPAT Sri Lanka successfully advocated for the Authority to include voluntourism on the Forum's agenda, by highlighting the specific risks to children associated with voluntourism activities. Initial discussions led by the Authority towards the end of 2024 identified several existing tourism-related guidelines to strengthen child safeguarding measures, including the *HomeStay Guidelines* and *Tour Guide Curriculum*. Additionally, the *Voluntourism Guidelines*, developed by ECPAT in collaboration with Forum members and other key stakeholders, are scheduled for validation in 2025.

➤ **This process, led by the National Child Protection Authority, aims to adopt these guidelines as national standards for child-safe voluntourism, and the consultations are ongoing in 2024-2025.**

<sup>51</sup> International Development Group LLC. (2023). *USAID Indo-Pacific opportunity project (IPOP) - Sri Lanka Tourism and Sustainability Activity: Recommendations for Proposed New Sustainable Niche Tourism Categories in Sri Lanka* USAID.



## REGULATING VOLUNTOURISM: INDONESIA'S APPROACH

Indonesia is another popular destination for voluntourism activities with children in Asia. A desk review of packages offered online to tourists who are interested in combining travelling with volunteering points to several activities, such as engagement in orphanages, schools, and childcare activities, including with disabled children among other social or environmental projects. In general, both foreign and domestic tourists are rarely required to demonstrate professional skills, nor to provide criminal background checks, and child safeguarding measures are not in place, putting children in local communities at risk.

### Current legislation and regulations

While regulation of formal volunteering activities is in place, with several laws and schemes regulating them,<sup>52</sup> volunteering in tourism is not regulated and mitigation of risks that results from these activities has not yet been recognised as a priority across the country. Some progress has been made in Bali, where the Provincial Regional Technical Implementation Unit for the Protection of Women and Children recognised that the issue of voluntourism represents a gap in current regulations, as these activities can be misused by perpetrators to sexually exploit children. The attention to the issue was triggered by a case of sexual violence against children committed by a foreigner who married an Indonesian citizen and run a foundation that allowed voluntourism activities with children. This case pointed also to the fact that the visa process needs to be more carefully examined, as criminal background checks from foreign countries have its limitations.

ECPAT Indonesia together with the child protection network of other organisations continues to advocate with the government at both national and local levels. Together with the Ministry of Women Empowerment and

Child Protection, ECPAT has been conducting assessments, training and monitoring on developing the child friendly tourism village programme in several provinces that have become priority tourism destinations in Indonesia. At the local level, the Provincial Government, through the Social Services, Women's Empowerment and Child Protection offices and the abovementioned Provincial Regional Technical Implementation Unit, is strongly supportive and open to cooperation in continuing the good practice of creating child-friendly communities in Bali's tourism sector. However, more agencies and institutions should participate and share the same spirit, including the tourism association and the private sector.

### Addressing Child Exploitation in the Tourism Sector

To address child exploitation in tourism in Indonesia, the Dutch Association of Travel Agents and Tour Operators and Riksja Travel initiated a consortium "Child Labor Eradication in the Tourism Sector" in 2019. The consortium resulted in positive developments. Member companies do not allow orphanage tourism and visits in orphanages or childcare centres and regularly carry out due diligence including through supply chain, not allowing activities that are detrimental or risky for children. Visit packages to both orphanages and schools have been stopped with leading responsible companies actively voicing efforts to protect children as part of the consortium.<sup>53</sup> The consortium members took this initiative after understanding the risks related to child protection in the context of voluntourism related activities with children. In this way, the initial intention to involve local communities and social foundations to generate income can be redirected to positive solutions. Also, trainings organised as part of the consortium influenced other actors such as the Bali Tourism Board, or the Association of Indonesian Tour Guide in Bali, to take action to regulate voluntourism, and work more broadly on child protection.

<sup>52</sup> Regulation of the Minister of Social Affairs Number 14 of 2020 concerning the Practice Standards of Social Works; [The Regulation of the Agency for the Protection of Indonesian Migrant Workers Number 1 of 2021](#) concerning Volunteer Communities of Indonesian Migrant Workers; Law No. 9 of 1964 - Indonesian Volunteer Movement, Strategy or Plan related to volunteering activity; or [Law No. 24 of 2007 on Disaster Management](#).

<sup>53</sup> Child Labor Eradication in the Tourism Sector Consortium in Indonesia as of December consists of companies: ANWB Reizen, de Jong Intra Vakanties and Sawadee in the Netherlands; and Happy Trail, Khiri Travel, Discova and Marintur operating in Indonesia.

## IN BALI, A MEMORANDUM OF UNDERSTANDING

proposed by ECPAT Indonesia formulates a basis for a joint and cross-sectoral approach in coordinated efforts to protect children in the travel and tourism sector. This includes an important element of engaging traditional leaders, so that the problem can also be addressed through customary regulations at the level of villages through so-called *parerem*.

## ENGAGING EDUCATIONAL SECTOR

The education sector plays a key role to change the mindsets towards unregulated voluntourism with children. To engage the education sector, interviews were conducted by ECPAT Indonesia with tourism departments and students in Bali.

## THIS ALLOWED TO RAISE AWARENESS

in the sector that unregulated voluntourism activities with children are not only not beneficial but put children at risk of sexual exploitation. While grounds for discussing this topic were built, more needs to be done to engage tourism schools and universities and encourage them to incorporate child protection and the issue of voluntourism, into their training curricula to become part of the child protection system.

# How is voluntourism with children falling between the regulatory cracks in Latin America, despite partial regulation of formal volunteering?



## Legal and policy frameworks regulating volunteering - examples from Colombia, Peru and Uruguay

In Latin America, an online market review of voluntourism offers showed that such products include activities with and for children with projects revolving around childcare placements, teaching, sport coaching activities in schools, or placements in the community centres to engage with street or disabled children in large cities, tourism destinations, and favelas. Accommodation for voluntourists is often provided in private houses with local families or hostels, sometimes in the proximity of attractive tourism locations. Some offers require basic knowledge of Spanish or Portuguese, thus limiting the possibilities of engagement for only English-speaking volunteers. The luxury travel and tourism industry also offers the possibilities to combine travel and volunteer activities through tailor-made programmes, for example in schools.

**Some organisations offer special programmes such as summer programmes, or travel-oriented experiences with volunteering being a small part of broader packages.**

While placements include direct engagement with children in vulnerable settings, child safeguarding standards and a minimum threshold for qualification, skills and experience for work are not commonly implemented, and only a few organisations ask for criminal background checks. Unregulated voluntourism products can be found across the region. The chapter below, is limited to the analysis of the regulatory frameworks in three selected countries (Colombia,

Peru and Uruguay) and brings attention to the fact that although some countries have robust regulatory frameworks for formal volunteering, these do not cover voluntourism activities.

## Formal volunteering framework vs. voluntourism: Colombia

Colombia has regulated voluntary work through a law<sup>54</sup> that establishes the purposes and principles of volunteering and recognises two types of organisations: volunteer organisations, whose purpose is to develop plans, programmes, projects and volunteer activities; and other entities which carry out volunteering activities. The law applies to Colombian organisations that send volunteers and to incoming volunteers. While there is an element of travel of the volunteers from one country to another, it is not associated with tourism-related activities, leaving the phenomenon of voluntourism products offered by companies and other organisations on the tourism market out of its scope.

The law created the National Volunteer System, which aims to promote and strengthen volunteer activities through strategic alliances. It was regulated by decree creating a volunteer registration system for Volunteer Organisations, and entities with volunteering actions have the obligation to update this registry with information on the volunteer, including the name and ID, number of monthly volunteering hours, profession, level of education and tasks. The obligations for volunteers are not provided for in the law, such as for example the requirement of professional skills, the need to receive training or initial induction, or to provide a criminal record certificate in the case of working with children. Although standards have been established to outline the operations of organisations running volunteering programmes, there are no minimum safeguarding measures in the case of volunteer work that involves contact with children.

<sup>54</sup> Función Pública. (2001). Ley 720 de 2001. Congreso de Colombia.

Also, while volunteering activities listed in the law include “social services, civic, leisure and free time, religious, educational, cultural, scientific, sports, health, development cooperation, environmental protection, economic protection, or research and similar activities”, these do not define the target populations, or whether these activities can be carried out for and with children.

The issue of unregulated voluntourism packages offered on the market is not contemplated within the scope of this legislation, and the current legal framework for formal volunteering leaves gaps in terms of clarity about any activities with children. The inclusion of the requirement of safeguarding measures is necessary in formal volunteering to ensure the protection of children with whom professional and trained volunteers could engage or interact with in local communities.

## Formal volunteering framework vs. voluntourism: Peru

In Peru, the General Law on Volunteering<sup>55</sup> recognises volunteering activities of Peruvian and foreigners and indicates the legal conditions under which such activities can be carried out. The law covers volunteering in public or private entities, urban areas, as well as in rural and indigenous communities and with vulnerable populations.

This law also created the National Volunteer System<sup>56</sup> administered by the Ministry of Women and Vulnerable Populations. The registry is open for registration by individuals and volunteer organisations, but it is not mandatory. However, the law establishes that “all volunteer organisations must have intervention protocols, according to the nature and risk of the action to be carried out”, which could be interpreted that working with children would require having such regulation, especially when engaging with vulnerable populations. For the preparation of these protocols, technical assistance can be obtained. It also indicates that training should be provided by volunteer organisations to volunteers. This law also created the National Commission for Volunteering, which is mandated to support, promote and assist organisations of volunteer services at the national level. The areas of activity of the National Commission include supporting disadvantaged children and mothers, which reaffirms the need for the above mentioned protocols.

**The law establishes the rights of the volunteers to receive free and certified training by the volunteer organisation, the Ministry of Women and Vulnerable Populations or other specialised entities.**

It sets the requirement for background checks, and demonstrating no record for crimes committed against sexual freedom, illicit drug trafficking, terrorism or other crimes, as a prerequisite to engage as a volunteer. The volunteers have a right to participate in the definition of the tasks or activities in which the service will be developed and propose modifications. There are also guidelines for the supervision of volunteering.<sup>57</sup>

Peruvian legislation on volunteering is the most comprehensive of those analysed in Latin America, since it allows protection measures for children to be established, including the registration of volunteers, protocols and background checks. It is necessary to establish the link between this regulated framework for volunteering to address the issue of unregulated voluntourism packages offered on the market.

## Formal volunteering framework vs. voluntourism: Uruguay

Uruguay has a Law on the Promotion of the Solidarity Participation of Individuals in Voluntary Activities for Public or Private Non-Profit Institutions<sup>58</sup> which defines and regulates the participation of nationals or foreign individuals in volunteering activities in public institutions, directly or organised through non-profit organisations.

**Volunteering organised by business companies for national or foreign volunteers falls outside of this scope. Although the possibility of a foreign person travelling to the country to volunteer is envisaged, no link with tourism and voluntourism activities are identified in this law.**

<sup>55</sup> Law No. 28238 of 2024: [Ley N 28238 - Ley General del voluntariado](#). and The regulations governing voluntary action also include the [Regulations of Law No. 28238, General Law of Volunteering, approved by Supreme Decree No. 003-2015- MIMP of July 2, 2015](#).

<sup>56</sup> Gobierno de Perú. [Sistema Nacional de Voluntariado \(Sinavol\)](#).

<sup>57</sup> Dirección de Voluntariado. (2021). [Lineamientos para la supervisión del voluntariado en el marco de la Ley General de Voluntariado y su Reglamento](#). Dirección General de Población, Desarrollo y Voluntariado. Ministerio de la Mujer y Poblaciones Vulnerables.

<sup>58</sup> Normativa y Avisos Legales del Uruguay. (2005). [Ley N. 17885. Promoción de la participación solidaria de particulares en actuaciones voluntarias para instituciones públicas o privadas sin fines de lucro](#). Centro de Información oficial.

The law also establishes the concept of “social volunteers”, understanding it as physical persons who act individually or through an institution, officially recognised by the government or not, which implies that they could operate with some margin of informality. The law establishes mechanisms to formalise the relationship between the institution and the volunteer through collaboration agreements. In terms of monitoring, the law provides that public institutions must notify the National Civil Service Office of the list of volunteers and the description of the tasks assigned to them. Agreements must be registered with the Ministry of Labour and Social Security. This law also recognises a series of rights for volunteers to receive the information, training, guidance, support and resources. It also defines duties that require participation in the training and to comply with the legal system. There are no specific requirements for safeguarding measures that would be

required for any work with children. Basic requirements are provided for, such as the registration of volunteers with a description of the tasks, as well as the training.

The issue of unregulated voluntourism packages is not contemplated within the scope of the laws and regulations for volunteering in Uruguay, although the possibility is established for foreigners to travel to the country to carry out volunteer work that can involve children. The current legal and policy framework leaves gaps to protect children in travel and tourism - including in formal volunteering. There is a need to regulate all forms of professional volunteering with children, whether by paid staff or volunteers, and ensure that safeguarding policies are in place in all the organisations where professional volunteers work, including non-governmental.<sup>59</sup>

These legal and regulatory frameworks from three countries in Latin America regulate formal volunteering activities to varying extent, sometimes without clear safeguarding measures for the activities with children. All these frameworks do not address the issue of unregulated voluntourism with children offered on the tourism market in various settings such as schools, sport clubs or childcare centres.

While legal and policy changes will take time, a good practice example of a guidance comes from the Regional Action Group of the Americas for the prevention of sexual exploitation of children in travel and tourism, that developed an Action Protocol Model for Tour Guides<sup>60</sup> with guidelines for preventing, identifying, and reporting suspected situations of sexual exploitation, and/or child labour including in the remote areas and local communities.

**The guidelines also specifically call upon all tour guides to discourage travellers and tourists from engaging in volunteer activities with unregulated and unsupervised access to children and/or visits to institutions that offer residential care, putting children at risk of sexual exploitation.**

<sup>59</sup> See the video intervention: [Interview with Gonzalo Salles: How can professional volunteering support child protection work?](#) held at the Regional Workshop for The Americas on the Collective Action to end the sexual exploitation of children with the San Jose, Costa Rica, 2024.

<sup>60</sup> ECPAT International. (2022). [The Americas - Preventing the sexual exploitation of children in travel and tourism \(GARA\)](#).

# How have the origin countries approached the regulation of voluntourism?

## Case studies from Australia, Germany, Ireland, The Netherlands and Norway

### Regulating Voluntourism: Australia case study

Australians have a well-established tradition of volunteering, both domestically and internationally. Within Australia, the domestic volunteering sector is governed by a robust framework that ensures the safety and ethical management of volunteers. This framework is overseen by Volunteering Australia,<sup>61</sup> the national representative association for the volunteering sector, and supported by individual state and territory associations. Organisations that engage volunteers within Australia must comply with a variety of legal requirements, including workplace safety regulations, negligence laws, child safe standards, and mandatory screening checks for those working with children. These standards are detailed in the National Volunteering Guide<sup>62</sup> and are aligned with Australia's National Volunteering Impact Strategy.<sup>63</sup>

In addition to legal obligations under federal labour, state labour and occupational health and safety laws,<sup>64</sup> all volunteer engaging organisations, whether public, private or charitable organisations, must adhere to sector-specific codes of conduct and professional standards, which often outline qualifications, accreditation requirements, and quality assurance measures. These sectoral codes are enforced by the sector specific departments or regulatory bodies, mainly at the state level. These standards ensure that both employees and volunteers meet the necessary criteria, particularly in professional roles and roles engaging with children or vulnerable persons.

**Furthermore, these standards influence, and in some cases restrict, the types of activities that volunteers can participate in, and the level of training and supervision required, especially in sensitive environments.**

In recent years, the Australian government has broadened its focus to address the risks to children posed by overseas travel and voluntourism activities. This shift is largely due to the growing evidence of risks associated with sexual exploitation of children in travel and tourism and orphanage voluntourism, which exposes vulnerable children overseas to a range of risks and incentivises orphanage trafficking and exploitation.<sup>65</sup> As a result, the government has introduced measures to restrict overseas travel for individuals convicted for sexual crimes against children on the National Child Offender Register and to discourage and regulate the involvement of Australian citizens, residents, and organisations in orphanage voluntourism activities abroad.<sup>66</sup>

### Preventing sexual exploitation of children in travel and tourism

In 2017 Australia became the first country to introduce legislation to restrict overseas travel for individuals convicted for sexual crimes against children who are on the National Child Offender Register with reporting obligations.<sup>67</sup>

<sup>61</sup> Volunteering Australia.

<sup>62</sup> Justice Connect. (2024). [National Volunteering Guide Part 1](#) and [National Volunteering Guide Part 2](#).

<sup>63</sup> Volunteering Australia. [Impact Strategy 2024-2027](#).

<sup>64</sup> See the [National Volunteering Guide Part 2](#) (p. 34) for more information about the legal obligations of volunteering involving organisations in Australia.

<sup>65</sup> Lyneham S. & Facchini L. (2019). [Benevolent harm: Orphanages, voluntourism and child sexual exploitation in South-East Asia](#). Trends & issues in crime and criminal justice no. 574. Canberra: Australian Institute of Criminology.

<sup>66</sup> There have been several successful prosecutions of Australian citizens for violating this division under the Commonwealth Criminal Code. The division includes provision whereby Australian federal police can inform international law enforcement partners for them to take action including denying the person entry into another country.

<sup>67</sup> To read more about the complexities surrounding child sex offender registries, please see: ECPAT International. (2023). [New ECPAT International study breaks down the complexities surrounding child sex offender registries](#).

The Passports Legislation Amendment (Overseas Travel by Child Sex Offenders) Act 2017<sup>68</sup> amended the Criminal Code and Foreign Passports Law, bringing into effect three new measures designed to prevent sexual exploitation of children in travel and tourism:<sup>69</sup>

- 1. A criminal offence for reportable offenders who travel, or attempt to travel, overseas without permission.**
- 2. A border alert to stop reportable offenders at the border, preventing their overseas travel.**
- 3. A scheme for the cancellation of passports held by reportable offenders by the Minister for Foreign Affairs.**

All offenders on the National Child Offender Register with reporting obligations must formally request permission to travel overseas from a competent authority (State or Territory Police Commissioner). Permission is only granted in exceptional circumstances, and offenders who hold valid passports yet travel or attempt to travel overseas without permission are subject to criminal sanctions.

## Regulating Orphanage Voluntourism

Efforts to regulate Australia's involvement in orphanage voluntourism began in 2015 with the formation of ReThink Orphanages Australia, a cross-sectoral working group. Informed by a sector mapping exercise, the group united representatives from across involved sectors, including education, not-for-profits, travel and tourism, and faith-based organisations, to engage with the government on the issue. At the time, anecdotal evidence suggested Australia was one of the largest donors and voluntourism-origin countries, particularly focused on Southeast Asia, but there was no data quantifying Australia's involvement in funding or voluntourism in overseas residential care institutions.

One of ReThink Orphanages' first initiatives was a sector mapping exercise, which mined existing data to establish the extent of Australia's involvement in orphanage voluntourism. Released in 2016, the Mapping Australia's Support for the Institutionalisation of Children Overseas Report<sup>70</sup> revealed the existence of 565 Australian registered charities operating or involved in overseas residential care institutions and of 245 non-governmental organisations funding or sending volunteers to these institutions, many of which supported multiple facilities in different countries. The report also

identified 312 faith-based organisations supporting overseas residential care institutions, although the true figure was likely higher due to reporting exemptions for religious organisations. In the travel and tourism sector, 22 Australian agencies were identified as facilitating voluntourism in orphanages, with an additional 61 brokers located outside of Australia and recruiting Australian voluntourists. In the education sector, 57% of universities were involved in facilitating orphanage volunteering/ voluntourism, with involvement rates in secondary schools varying between 4% and 16%, depending on the state.<sup>71</sup> To fill gaps in data for religious organisations, further research via the National Church Life Survey was undertaken in 2017 and revealed that

**36%**  
OF CHRISTIAN CHURCHES

**52%**  
OF INDIVIDUAL CHURCHGOERS

supported overseas residential care institutions, often through funding and voluntourism.<sup>72</sup>

<sup>68</sup> Federal Register of Legislation. Passports Legislation Amendment (Overseas Travel by Child Sex Offenders) Act 2017. Australian Government.

<sup>69</sup> National Guidelines: Assessment of applications from reportable offenders for permission to travel overseas.

<sup>70</sup> van Doore, KE, Healy L and Jones, M. (2016) Mapping Australia's Support for the Institutionalisation of Children Overseas. ReThink Orphanages.

<sup>71</sup> Ibid.

<sup>72</sup> Hancock, N. and Pepper, M. (2017). Local Church Support for Overseas Residential Care Facilities and the Charitable Status of Churches. NCLS Commissioned Report No. 2017.19 NCLS Research, Sydney; and Pepper, M. and Hancock, N. (2017). Church Attender Support of Overseas Residential Care Facilities for Children. NCLS Commissioned Report No. 2017.11. NCLS Research, Sydney.

This data played a key role in ReThink Orphanages' advocacy efforts with parliamentary committees, the Senate, the Department of Foreign Affairs, the Attorney General's Department, the Australian Tax Office, the Australian Charities and Not-for-Profit Commission, and the Department of Education, to raise awareness on the risks associated with orphanage voluntourism. In 2017,



## a Parliamentary Inquiry into the creation of a Modern Slavery Act provided an opportunity to examine orphanage trafficking and its links to orphanage tourism, voluntourism, and funding.

The inquiry's report, *Hidden in Plain Sight*,<sup>73</sup> included a chapter with recommendations for a whole-of-government approach to combat orphanage trafficking, calling for legislative and regulatory actions across multiple sectors.

In 2018, Australia enacted the Modern Slavery Act,<sup>74</sup> becoming the first country to formally recognise orphanage trafficking as a form of child trafficking. The Guidance for Reporting Entities with obligations to report under the Act identified orphanage voluntourism as a sector-specific risk that Australian reporting entities were required to consider in their modern slavery reporting.<sup>75</sup> Additionally, the Australian Taxation Office began public consultations on new charity sector regulations designed to govern Australian charities' overseas activities. ReThink Orphanages, alongside the Australian Council for International Development, submitted recommendations to regulate Australian charities' involvement in orphanage voluntourism and the funding of residential care institutions.

These efforts culminated in the establishment of the Australian Charities and Not for Profit Commission External Conduct Standards in 2019,<sup>76</sup> setting criteria for Australian charities to protect vulnerable individuals from harm, abuse, or exploitation. Recognising residential care as a high-risk environment and volunteering with children as a high-risk activity, these standards required charities to implement strict protective measures. Furthermore, charities were required to ensure that all third-party organisations they worked with overseas were appropriately registered and licensed, preventing them from partnering with or sending volunteers to unregistered orphanages.

In 2018, the Department of Foreign Affairs and Trade launched the Smart Volunteer Campaign,<sup>77</sup> to discourage Australians from participating in orphanage voluntourism, a practice that puts children at risk. The campaign not only raised awareness but also involved collaboration with state and territory governments to ensure that schools and universities ceased participation in such activities. Moreover, the Department of Foreign Affairs engaged with the travel and tourism sectors to promote responsible volunteering and established policies to ensure that no government funding went to charities, development programmes, or education sector initiatives linked to orphanage voluntourism.

Further efforts were made in 2022 when the Attorney General's Department conducted a targeted review of Australia's Human Trafficking and Slavery Offences. Public consultations during the review explored whether existing laws adequately covered orphanage trafficking and exploitation. ReThink Orphanages' submissions, advocating for amendments to ensure Australia's child trafficking offences are fit for prosecution of Australian citizens, residents and entities involved in orphanage trafficking and exploitation offences overseas were reflected in the government's 2023 findings report,<sup>78</sup> although these recommendations have yet to be implemented.

<sup>73</sup> Parliament of the Commonwealth of Australia. (2017). *Hidden in Plain Sight: An inquiry into establishing a Modern Slavery Act in Australia*. Canberra.

<sup>74</sup> Federal Register of Legislation. *Modern Slavery Act 2018*. Australian Government.

<sup>75</sup> Commonwealth of Australia. (2023). *Commonwealth Modern Slavery Act 2018: Guidance for Reporting Entities*. Canberra.

<sup>76</sup> Australian Charities and Not-for-profits Commission. *ACNC External Conduct Standards*. Australian Government.

<sup>77</sup> Smartraveller. (2021). *Going overseas to volunteer*.

<sup>78</sup> Attorney-General's Department. *Targeted Review of Modern Slavery Offences in Divisions 270 and 271 of the Criminal Code Act 1995 (Cth)*. Australian Government.

While Australia has made notable progress in regulating orphanage voluntourism, particularly within the charities and education sectors, there is still a critical gap regarding the regulation of voluntourism activities provided by corporate entities, including orphanage voluntourism. In 2024, ReThink Orphanages analysed Australia's Corporations Act 2001,<sup>79</sup> which is the principal legislation regulating business entities operating in Australia. The Corporations Act provides for the regulation of companies, products and services, including the licensing and conduct of companies, and sets out the duties of company officers (the director or secretary of the corporation). This makes the Corporations Act potentially relevant for the regulation of for-profit voluntourism companies. ReThink Orphanages Australia issued a report recommending the addition of mandatory child protection standards to existing directors duties regulations made under the Corporations Act.

**Such standards would help regulate overseas voluntourism activities by for-profit providers, addressing a key deficiency in Australia's voluntourism regulatory framework.**

## Regulating Voluntourism: Germany

In Germany, the risks of abuse, grooming and exploitation of children, as well as the harm caused to the well-being, emotional and cognitive development of children resulting from abandonment and traumatisation in the context of orphanage voluntourism have been recognised and studied since 2015. In 2023, ECPAT Germany and Tourism Watch @Brot für die Welt conducted a new market analysis to understand the relevance of the voluntourism offers, in the aftermath of Covid-19 pandemic.<sup>80</sup> Interviews with providers showed that they expected the quantitative demand to return to pre-Covid levels in 2025.

**Cuts in public budgets for international cooperation might result additionally in defunding publicly funded international official volunteering programmes.**

This may result in further demand in the commercial voluntourism market, sending voluntourists abroad through unregulated channels.

The main changes observed in the new study were that marketing of authentic experiences, including homestays, seemed more popular compared to the pre-pandemic research results, in line with the global tourism trends. The research brought attention to family accommodations or volunteer houses, which pose children's protection at risk, even if the volunteer projects are not directly focused on working with children but for instance in the environmental sector.

<sup>79</sup> Australian Government. (2019). *Corporations' Act 2001*.

<sup>80</sup> ECPAT Germany, Tourism Watch. *Update 2023: Child Protection and Voluntourism Preliminary findings on the German voluntourism market*.

It was observed that, although there are global campaigns on ending orphanage volunteering,

# THERE WERE STILL 9 OF 24 TRAVEL AND TOURISM COMPANIES IN GERMANY THAT SEND VOLUNTEERS TO ORPHANAGES.

**This number is even slightly higher than in earlier market analyses conducted in Germany.**

The market research allowed to understand the relevance of the voluntourism issue for Germany, what kind of products do providers offer and which child protection measures are integrated in these offers. It revealed that although there are measures in place, these are not adequately applied, as only a few companies require a police clearance certificate in the selection process, and not all of them offer preparatory courses. This study identified gaps, which ECPAT Germany and Tourism Watch @Brot für die Welt addressed through an advocacy campaign with the government. As part of The Federal Child Protection Act (Bundeskinderschutzgesetz) and the Child and Youth Strengthening Act (Kinder- und Jugendstärkungsgesetz), the call is to harmonise the regulatory framework for child protection by applying child safeguarding and minimum standard regulations requirements to both commercial and non-commercial volunteer services, as currently this act applies only to non-governmental organisations. Additionally, the scope of these regulations should be extended to activities outside Germany. Therefore, beyond the specific regulations for professional volunteering inside Germany and abroad in line with the Federal Volunteer Service Act (Bundesfreiwilligendienstgesetz) as well as the Youth Volunteer Service Act (Jugendfreiwilligendienstgesetz), that require supervision and certification procedures for placement sites, further advocacy is needed to introduce specific regulations for the protection of children in origin and destination countries.

ECPAT Germany also engaged with business willing to implement child protection measures, as described in The Code and its Voluntourism Policy<sup>81</sup> to stop offering volunteering in orphanages, and address child protection risks within the scope of their business activities. A good practice example comes from DER Touristik (a member of The Code) that screened all their portfolio and offers, and among the salient risks they identified visits to orphanages, schools, children at homestays, performances and dances with children, as well as voluntourism activities with children. As a result, the company prohibited products that consist of visits to schools or orphanages and provides clear reference not to allow children to do performances or dances as part of tourism attractions.

The German Act on Corporate Due Diligence Obligations in Supply Chains, similarly to the EU Directive on corporate sustainability due diligence, only applies to large corporations - in the case of Germany, those with more than 1000 employees, and none of the companies offering voluntourism falls under this law. This calls for continuing engagement through a smart mix of voluntary and mandatory measures. Beside these shortfalls, the law is an important milestone and offers important orientation to companies on how to conduct due diligence for human rights and child protection. The recently developed online training by Futouris and Roundtable Human Rights in Tourism, funded by the German Ministry of Economic Cooperation and Development, aims to equip small-scale suppliers in travel destinations to understand this new regulation and to develop and implement measures to address human rights risks.

<sup>81</sup> [The Code Voluntourism Policy](#).

The five modules of the online course are published on GIZ's atingi platform.<sup>82</sup> ECPAT Germany and Tourism Watch @Brot für die Welt contributed to the formulation of the Global Call for Robust Child Protection Structures in Travel and Tourism through their contributions to the United Nations General Assembly 2023, aimed at pushing for further actions to close gaps in child protection issues related with unregulated voluntourism. A webinar on how to protect children from sexual exploitation by voluntourists in Southeast Asia, hosted by the Roundtable Human Rights in Tourism in November 2024, reflected that voluntourism is on the rise in the region and beyond, providing international travellers with direct opportunities to engage with children in local communities, with no safeguarding measures in place. It was reflected that the demand comes mostly from the United States, United Kingdom, Australia, Canada and European countries, and that there is a need for a more coordinated approach to regulate voluntourism between both origin and destination countries, including with the engagement of police, immigration authorities and customs officers.<sup>83</sup>

Importantly, ECPAT Germany calls for one standard: to apply the same child protection regulatory standards for commercial operators in tourism and for non-commercial actors, so to better protect children in the context of voluntourism.<sup>84</sup>

## Regulating Voluntourism: Ireland

Historically, many Irish people have visited, volunteered in or financially supported orphanages around the world. Ireland has its own traumatic history of orphanages and residential care institutions for children, which featured high levels of systematic abuse and neglect.<sup>85</sup>

Since 2016,

**the Comhlámh's End Orphanage Volunteering Working Group has been campaigning to end orphanage volunteering from Ireland and to raise awareness about the harm caused by the institutional care of children,**

drawing on the parallels with their own history. The Working Group emerged from the Comhlámh Code of Good Practice - a set of standards developed by

<sup>82</sup> [Atingi Platform](#) can be accessed after registration free of charge.

<sup>83</sup> [Lunch and Learn with Anita Dodds: Protect Children from Sexual Exploitation by Voluntourists in South-East Asia](#), webinar held on 14 November 2024.

<sup>84</sup> See the video intervention: [Interview with Antje Monshausen: Voluntourism in Germany](#) held at the Collective Action to End Child Sexual Exploitation and Abuse: Regional Workshop in Europe. Vienna, Austria, 2024.

<sup>85</sup> [The Commission to Inquire into Child Abuse.](#)

<sup>86</sup> Tearfund Ireland. [Vivid Conference.](#)

<sup>87</sup> ECPAT International. [Comhlámh End Orphanage Volunteering Working Group and End Orphanage Volunteering Working Group \(2023\).](#)

[IRELAND - Regulating voluntourism as part of child protection standards for the travel and tourism industry.](#)

<sup>88</sup> [Forum. The Global Volunteering Standard.](#)

Comhlámh and the international volunteering sector in Ireland to promote values-led international volunteering. Following a long process of engagement with the Code of Good Practice's signatories, a principle to end the sending of volunteers to orphanages was successfully included in it. Tearfund Ireland worked alongside the Working Group to organise a conference on global care reform, bringing together experts from sending and receiving countries.<sup>86</sup> Additionally, a global citizenship education resource *Just Care: Just Volunteering* was developed to support learning and reflection on the issue.

Following this campaign, the Irish Department of Foreign Affairs has updated its foreign travel advice warning that people travelling from Ireland should not visit or volunteer in orphanages, and signposting Comhlámh as the key organisation for the promotion of values-led international volunteering. Irish Aid, the official development programme of the Irish Government, has actively engaged with the recommendations. This has included a review of funding criteria - any organisations receiving funding by Irish Aid, whose programmes includes an international volunteering component, are required to be signatories to the Comhlámh Code of Good Practice, which, as stated above, includes robust criteria that promotes child-safe volunteering. Additionally, Irish Aid now requires these funding applicants to demonstrate how they are supporting the efforts to end orphanage volunteering. Finally, there is now an ongoing dialogue on the call to introduce a dedicated funding stream for care reform strategies, including family and community-based support programmes.

In 2023, the Comhlámh's End Orphanage Volunteering Working Group in cooperation with ECPAT International launched a case study reflecting key progress, gaps and recommendations for regulating volunteering in orphanages.<sup>87</sup> The case study was launched at the United Nations General Assembly to influence further action to close gaps in child protection.

In early 2024, Comhlámh launched the revised Code of Good Practice, with Principle 7 reaffirming the commitment of the signatories to ending orphanage volunteering and supporting global care reform. Through 2024, Comhlámh has contributed to the review of The Global Volunteering Standard<sup>88</sup> which aims at improving the outcomes of volunteering for development activities. While this global standard applies to formal volunteering in development that equally requires safeguarding standards for children, it also includes specific commitment to promote child-safe volunteering in all environments. Specifically, it urges organisations not to work with companies that include (or have the

potential to include) orphanages and other residential care facilities in tourism programmes or packages; and not to allow or facilitate one-off, short-term visits to orphanages or residential care facilities for children. Additionally in 2024, the Comhlámh End Orphanage Volunteering Working Group organised a series of knowledge sharing sessions for key stakeholders in government, civil society, faith-based groups and the education sector. These events focused on exploring the concrete steps that are required from individuals, organisations, and governments to regulate voluntourism and to promote global care reform.

A key learning from the Working Group is that regulation is unlikely to materialise in the short term. An important dimension is to work with all stakeholders to promote mindset change. The campaign has recently focused on the education sector, having identified that school trips to orphanages are prevalent. Another target group are tourism students - this cohort has an important role to play in promoting ethical travel and engaging and advocating with businesses that are facilitating voluntourism overseas to ensure that all forms of unregulated voluntourism with children are addressed, in orphanages and in other contexts. An important step forward has been the inclusion of the invitation not to travel to orphanages, as part of the travel advice for travellers from Ireland published by the Department of Foreign Affairs,<sup>89</sup> as well as a signpost to the Code of Good Practice. Efforts have been made to engage also the Department of Education to develop specific guidelines from schools not to visit or volunteer in orphanages as part of school trips.

This requires addressing the issue of orphanage volunteering through formal programmes run by government funds or promoted through ministries, but also addressing all forms of unregulated voluntourism with programmes offered on the market by business and other organisations. The learning from the Irish case study indicates also to the importance of engaging distinctively with faith-based organisations, shedding light on the tradition of volunteering in the faith-based sector, and the cultural shift that is necessary to engage more locally to create the mindset change.

## Regulating Voluntourism: The Netherlands

In The Netherlands, the efforts to regulate voluntourism started with the initiative of Better Care Network Netherlands on the issue of orphanage voluntourism back in 2007, through campaigning and advocacy. In 2015, Volunteer Correct Foundation was founded, introducing a transparency-index on how volunteer-

sending organisations communicate their offers to future volunteers, and if they offer assignments in orphanages. This association was put on hold due to the Covid-19 pandemic and has not been reestablished. The government started to investigate the possibility of introducing regulations as a result of a study commissioned in 2019, since the available legal instruments and measures to prevent transnational perpetrators of sexual crimes against children, even convicted ones, from travelling abroad, were not often used. The statement of the government was that it is the citizens' and sector's responsibility to regulate. In 2020 a motion on a general duty of care for companies in accordance with the Organisation for Economic Cooperation and Development's guidelines was passed in the House of Representatives. The examples of regulations that apply to nationals who can potentially engage in voluntourism activities include the Certificate of Conduct (in Dutch: 'Verklaring Omtrent Gedrag') for persons who want to work with children in the Netherlands, but it is not obligatory for working with children abroad. The Dutch Passport Act makes it possible to refuse or to revoke a passport in certain cases where there is a reasonable suspicion that a person may commit a criminal offence abroad, similar to one for which they have been irrevocably convicted in the past ten years, but it is not often used. As part of a comprehensive preventive approach, The Netherlands focuses on helplines and treatment programmes, such as 'Stop it Now' to support potential offenders in managing their behaviours.

In 2023, DCI-ECPAT Netherlands together with ECPAT International, as part of the Down to Zero Alliance programme, launched a case study developed together with Better Care network Netherlands, reflecting key progress, gaps and recommendations for regulating voluntourism in the Netherlands.<sup>90</sup> The case study was launched at the United Nations General Assembly to influence further action to close gaps in child protection issues related with unregulated voluntourism.<sup>91</sup>

The Dutch government website features tips about international volunteering and discourages volunteering in orphanages.<sup>92</sup> As of 2024, the specific messages about volunteering in orphanages have been removed from the travel advice pages of specific countries because the travel advice formulation had to be more concise, however, there are chapters about laws and customs that warn about long prison sentences for "sex with minors".<sup>93</sup> The small-scale private development initiatives, such as foundations set up by small group of volunteers after, for example, travelling or volunteering in the Global South, form the biggest category of providers of volunteer travel opportunities to residential care facilities for children in low and middle-income countries.

<sup>89</sup> Department of Foreign Affairs. [Backpacking, volunteering and adventure tourism](#). Ireland.

<sup>90</sup> ECPAT International. Defence for Children - ECPAT Netherlands, Better Care Network Netherlands (2023). [THE NETHERLANDS - Regulating voluntourism as part of child protection standards for the travel and tourism industry](#).

<sup>91</sup> ECPAT International. (2023). [A global call for robust child protection structures in travel and tourism](#).

<sup>92</sup> [Volunteer work: questions and answers](#).

<sup>93</sup> The Ministry of the Foreign Affairs of The Netherlands. [Foreign Travel Advice in the chapters "Laws and customs" chapters](#). Additionally, the topic of volunteer work is discussed under key [Topics](#) and at [Volunteer work: questions and answers](#).

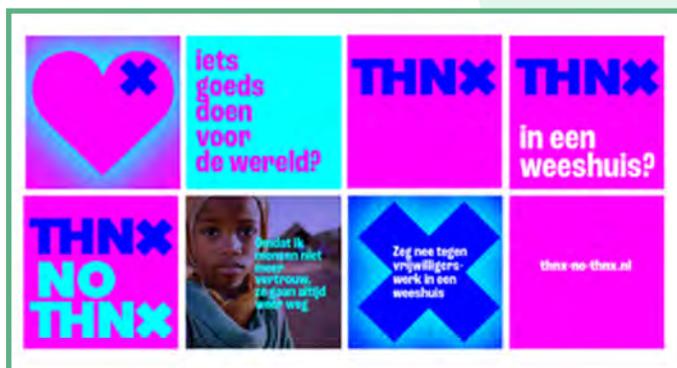
The government intends to stimulate these initiatives, for example by increasing their visibility or offering financial support for training and communication. Better Care Network Netherlands emphasises the need for training and awareness raising for volunteering projects with children and for the focus on development and implementation of child protection measures. The Certificate of Conduct to work with children abroad is yet to be mandatory, and background checks are not being requested structurally and thoroughly when it concerns international volunteering with children, especially in case of packages offered by private development initiatives.

In terms of the private sector regulations, once it becomes effective in 2025, the European Union's Corporate Sustainability Due Diligence Directive<sup>94</sup> will require companies to conduct due diligence and take responsibility for human rights abuses and environmental harm throughout their global value chains. It will apply to large corporations, but smaller companies offering voluntourism products will fall outside of this law. The due diligence regulations, combined with the voluntary measures promoted among the Dutch companies members of The Code, can help influence a growing number of companies to step up child protection measures and require a minimum threshold for qualification, skills, and experience for any work with or for children. The Code member companies, in line with The Code's Voluntourism Policy, do not offer visits to orphanages and residential care centres as part of their travel packages. Instead, they redirect tourists to solutions that can meaningfully help children and the communities. This leadership and good practices examples can encourage other companies to follow suit.

At the end of 2024 the initiative 'Volunteer Aware' was launched.<sup>95</sup> It is a platform that promotes responsible international volunteering among volunteer providers, the volunteers as well as the media. The platform provides advice through a transparency index that evaluates important aspects of ethical volunteering by comparing policies and approaches. Part of Volunteer Aware's mission is to discourage projects or assignments in children's homes and orphanages, and to ensure that any other projects promote family-based care. However, as for now members still promote unskilled volunteering with children in alternative care. As part of the transparency index, the platform offers a self-assessment tool for the organisations, requiring also to pay attention to community-based projects that offer access to children that are in a very vulnerable situation.

### Engagement of different relevant stakeholders has progressed, especially through:

- Checklist for private funds to assess international project proposals with children;<sup>96</sup>
- Guidance for transforming orphanages into family-based care of private initiatives;<sup>97</sup>
- University engagement, with a new university signing a pledge for not offering internships in orphanages (the fourth university joining the pledge);<sup>98</sup>
- Campaign launched in December 2024, addressing young volunteers: "Thnx-no-thnx - Volunteering? Thanks! In an orphanage: no thanks". Also, key statements (why not?) in this campaign are delivered by care leavers and experts from the Global South.



<sup>94</sup> [The Corporate Sustainability Due Diligence Directive \(CSDDD\) - Directive \(EU\) 2024/1760.](#)

<sup>95</sup> [Volunteer Aware.](#)

<sup>96</sup> Better Care Network Netherlands. [Informatie voor fondsen: Het financieren van kwalitatief goede \(alternatieve\) opvang voor kinderen zonder adequate ouderlijke zorg in lage- en middeninkomenslanden.](#)

<sup>97</sup> Better Care Network Netherlands. [Info voor particuliere initiatieven die werken met kwetsbare kinderen.](#)

<sup>98</sup> Better Care Network Netherlands. [Christelijke Hogeschool Ede tekent Pledge tegen stages in weeshuizen.](#)

Defence for Children - ECPAT Netherlands calls for ending unqualified voluntourism with children causing harm; sustainable travel and tourism is where children are protected, and voluntourism is regulated.<sup>99</sup> The approach is to continue improving child protection regulations concerning voluntourism with children in orphanages and other settings. This includes, among others advocating for requirements for charity status and Chamber of Commerce's registration, obligatory Certificate of Conduct, global citizenship programmes in the educational curriculum, advice and dialogue with volunteer sending agencies and networks like Volunteer Aware, and the use of legal options to prevent individuals convicted for sexual crimes against children from travelling abroad to engage in unregulated voluntourism activities.

## Regulating Voluntourism: Norway

In Norway, the issue of unregulated voluntourism first started to be addressed at the initiative of the Norwegian School of Hotel Management, Department of Leadership and Service Innovation, at the University of Stavanger. The Norwegian School of Hotel Management is the second oldest school of hotel and tourism in the world. Since 2018, ECPAT Norway has been invited by the Norwegian School to co-organise annual lectures and workshops on the protection of children in travel and tourism. These sessions allowed to reflect on voluntourism with children, including the approaches that businesses should take to regulate this issue in line with The Code's Voluntourism Policy.<sup>100</sup> Awareness raising activities have also been organised in partnership with SOS Children's Villages and International Baccalaureate students, as voluntourism continues to be popular especially among young people. Recently, a few tour operators have introduced minimum requirements of police clearance certificates for prospective voluntourists. In Norway, several companies in the travel and tourism sector continue to offer voluntourism trips to orphanages and other spaces with open access to "underprivileged children" without any safeguarding measures.

Norway is one of the first countries in Europe moving from soft to hard law in making responsible business a legal requirement for companies. In 2022, a Transparency Act was introduced that requires enterprises to carry out due diligence assessments and publish the results. The Act promotes enterprises' respect for human rights and decent working conditions and requires opening access to information regarding how enterprises address adverse human rights impacts. While the act refers to the two International Covenants on Economic, Social and Cultural Rights and on Civil

and Political Rights, as well as to the International Labour Organisation's core conventions on fundamental principles and rights at work, it does not mention the Convention on the Rights of the Child and its Optional Protocols, the Trafficking Protocol or the Lanzarote Convention.<sup>101</sup> As a result, the protection of children from sexual exploitation is oftentimes left out of the due diligence assessments. Furthermore, the act applies to larger enterprises, while voluntourism travels are often offered by smaller companies, leaving an additional gap.

To explore the scope of this new Act, the Norwegian School of Hotel Management, in collaboration with The Rafto Foundation and ECPAT Norway, organised the only event at the annual political festival Arendalsuka 2022 that explored how the Act could have an impact on the tourism sector, highlighting the industry's potential to address social inequalities and prevent human rights violations, especially in destinations where tourism is a significant sector. Building on this, in February 2023 the School hosted a full-day seminar "The tourism industry puts human rights on the agenda", where diverse stakeholders examined how the Act could strengthen human rights compliance within tourism. Through discussions and workshops, the seminar explored how the Transparency Act could regulate the sector's responsibility for safeguarding people and children living in destination countries. The event underscored the importance of collaboration in embedding human rights into the tourism value chain, ensuring the sector contributes to reducing risks and impacts, while addressing inequalities.

The Government is currently developing a strategy against human trafficking and related forms of exploitation, and

**ECPAT Norway is advocating for the inclusion of the Special Rapporteur's recommendations from the report on the exploitation and sexual abuse of children**

in the context of travel and tourism, including a closer look at the phenomena of voluntourism, concerning the strengthening of law, policy and practice to address all forms of exploitation against children, including orphanage tourism and other voluntourism travels that exploit children for profit in the travel and tourism industry.<sup>102</sup>

<sup>99</sup> See the video intervention: [Interview with Mirjam Blaak: Voluntourism in the Netherlands](#) held at the Collective Action to End Child Sexual Exploitation and Abuse: Regional Workshop in Europe. Vienna, Austria, 2024.

<sup>100</sup> [The Code Voluntourism Policy.](#)

<sup>101</sup> Council of Europe. [Lanzarote Convention.](#)

<sup>102</sup> Office of the High Commissioner for Human Rights. (2023). [A/78/137: Sale, sexual exploitation and sexual abuse of children - Report of the Special Rapporteur on the sale, sexual exploitation and sexual abuse of children.](#)

To promote change in the travel and tourism sector and among travellers, ECPAT Norway developed a series of e-learning modules, including on the issue of voluntourism.<sup>103</sup> The courses and video reflect on risks and impacts for children resulting from unregulated voluntourism activities and explain how to make ethical and responsible choices when choosing to work as a volunteer abroad.

Furthermore, in the follow up to the Global Call for Robust Child Protection Structures in Travel and Tourism, including regulating voluntourism,<sup>104</sup> the Norway School of Hotel Management and ECPAT Norway launched a campaign on voluntourism for and with young people. The campaign was developed together with young people themselves, it seeks to promote responsible travel choices and end the demand for unregulated voluntourism trips among young people. The campaign is run on social media by young people. In 2025, the campaign will be presented at education

fairs in all the major cities in Norway, that last year gathered

# 40,000

## YOUNG PEOPLE BETWEEN THE AGES OF 15-19,

thus presenting a big potential to influencing behavioural change among this new generation that can be best ambassadors to influence broader mindset change.

## Frivillig på barnehjem?

### Huskeliste før reisen:

-  Pakket badetøy og powerbank?
-  Forstått at "å hjelpe" betyr mer enn selfies med søte barn?
-  Googlet organisasjonen?
-  Husket at barna du møter ikke er attraksjoner?
-  Lest hva lokalbefolkningen faktisk mener om prosjektet?
-  Glemte å spørre hva som skjer med barna etter at du reiser?
-  Tro at 2 uker med deg endrer livene deres?
-  Tenkt på hva du faktisk kan bidra med (spoiler: det er ikke å "redde verden" alene)?



<sup>103</sup> ECPAT Norway: [E-learning](#)s and a video on the issue of voluntourism: [Part 5: Volunteer tourism - ECPAT Norway](#)

<sup>104</sup> ECPAT International. (2023). [A global call for robust child protection structures in travel and tourism.](#)

# What are the key lessons learned resulting from the processes across the countries?

## 1. Voluntourism needs to be clearly defined and delineated from formal and professional volunteering

In many countries, voluntourism is not clearly defined in law or policy and falls into a definitional and regulatory gap between tourism and formal volunteering. In most of the countries analysed, voluntourism was neither explicitly included nor excluded in the definition of volunteering provided in national volunteering frameworks, nor was it classified among the types of tourism activities or enterprises listed in tourism laws. These definitions in existing law and policy establish the regulatory jurisdiction of government agencies and mandated authorities, in terms of the scope of activities and entities governed by current regulations, standards, and codes of conduct.

The lack of a clear definition of voluntourism, coupled with a lack of understanding of the difference between formal volunteering and voluntourism and the negative impacts of the latter on children, result sometimes in confusion amongst stakeholders and ambiguity regarding which law should act as the primary governing statute for voluntourism, which government agency or regulatory body should oversee standard setting and regulatory enforcement, and whether existing volunteering standards or regulations could or should apply to voluntourism.

**This gap also affects the potential to restrict or prohibit high-risk voluntourism activities involving children through the application of existing child protection regulation to voluntourism activities.**

Closing this definitional gap and clearly situating voluntourism under the oversight of a specific government department/agency or regulatory body is essential for national efforts to strengthen voluntourism regulation. Such regulations should cover both public and private settings, formal and non-formal, educational, health, cultural, sport and institutional arrangements, business, profit and nonprofit organisations, big and small, national as well as international.

## 2. Awareness of the risks of unregulated voluntourism to children must be raised for the regulatory agenda to progress

The risks and negative impacts of unregulated voluntourism on children must first be acknowledged to drive a much-needed shift in mindsets before regulation can be pursued. However, these processes should be pursued concurrently, considering that any regulatory process requires time. While the harms of voluntourism in orphanages have gained increasing recognition—leading to growing efforts to discourage and regulate such practices—this awareness has yet to extend fully to other high-risk settings. Unskilled and unregulated voluntourism in schools, sports clubs, daycare centres, cultural events and similar environments continues to be overlooked, despite posing serious risks to children's safety, well-being, and rights.

Experiences from both origin and destination countries reveal a troubling trend: many organisations offering voluntourism projects perceive their activities as “good

volunteering.” This perception persists even when these projects involve short-term, ad hoc, and unsupervised engagements in settings where safeguarding protocols and industry standards would typically prohibit such ad hoc access and engagement with children in the volunteers' countries of origin. Such contradictions highlight the need for a fundamental change in how voluntourism is understood and practised, emphasising that good intentions alone do not equate to safe or ethical outcomes. This was clearly explained by the Kenya Alliance for Advancement of Children, calling for an urgent need for reshape voluntourism practices to regulate harmful forms of voluntourism, by separating tourism activities from voluntourism with children, because the two ideas, from the experience of civil society organisations in Kenya, are not working well for children.<sup>105</sup> This illustrates the fact that the very

<sup>105</sup> See the video intervention: [Interview with Timothy Ekesa | How does unregulated voluntourism put children at risk in Kenya?](#) conducted during the Regional Workshop for Africa on the Collective Action to end the sexual exploitation of children. Dakar, Senegal, 2024.

characteristic of unskilled voluntourism with children poses inherent risks to children and does not align with a "do no harm" strategy that should be guided by the best interests of the child. It has become evident, from the experience of Kenya and elsewhere, that attempts to facilitate "good" voluntourism with children has created more confusion and continued to lead to harm and exploitation of children.

Most countries featured in the case study identified awareness-raising and training initiatives as essential first steps toward regulating voluntourism. Integrating knowledge of the risks voluntourism poses to children

into existing tourism training programs proved to be a key entry point. These initiatives helped to generate awareness, build consensus, and garner political will, paving the way for policy and regulatory reforms. Moreover, awareness-raising and training efforts contributed to shifting mindsets and practices, which is crucial for mitigating voluntourism-related risks to children in the short term. Given that regulatory processes often require significant time to be enacted and fully implemented, these preliminary steps play a vital role in protecting children while laying the groundwork for long-term solutions.

### 3. Voluntourism regulation is best progressed when linked to other reforms, and situated within existing regulatory frameworks

Country case studies indicate that to advance voluntourism regulation, voluntourism must be integrated into existing policy frameworks and linked to ongoing or planned regulatory reforms that already enjoy political support. Landscape analyses enabled national actors to identify relevant entry points and opportunities to align voluntourism with broader yet related agendas within their specific country context. In some origin countries, the momentum to enact or amend modern slavery legislation was leveraged to raise awareness of high-risk forms of voluntourism, such as orphanage voluntourism, which is associated with child trafficking and sexual exploitation. This created an opening to engage stakeholders across related sectors and government agencies to address regulatory gaps in criminal law, modern slavery legislation, charity sector regulation, and foreign aid.

In destination countries, previous efforts to combat the sexual exploitation of children in travel and tourism through collaboration between law enforcement, child protection and tourism actors created a foundation to underscore the gaps in child protection when voluntourism remains unregulated. In several countries, awareness raising regarding the risks of voluntourism to children was incorporated into existing child safe tourism campaigns and training packages, allowing information to be readily disseminated through pre-existing channels.

In one destination country, the landscape analysis highlighted child protection and care system reforms as the primary entry point for pursuing the regulation of voluntourism involving children. This approach leveraged existing momentum within the child protection sector, particularly an ongoing stakeholder process to draft a new law on child protection. Once enacted, this law would need the development of new regulations for its implementation, creating an opportunity to advocate for specific measures addressing voluntourism activities with children. This strategy contrasted with the diminished activity of the child-safe tourism committee, which had been affected by recent leadership changes and

post-pandemic resource constraints. By aligning with the more active and engaged child protection sector, stakeholders could capitalise on the existing reform process to advance regulatory efforts addressing the risks of voluntourism.

Number of origin and destination countries have well-established frameworks for skilled volunteering, including national policies, standards, regulations, and mechanisms for coordinating volunteer recruitment, approval, placement, and the issuance of work permits and visas. In volunteer-receiving countries, these frameworks often encompass both domestic and international volunteering linked to government-funded volunteering for development programmes under Official Development Assistance. These skilled volunteering frameworks are typically overseen by a government-appointed regulatory body responsible for policy development, standards, and coordination. However, an analysis of country case studies revealed that voluntourism is rarely addressed within these frameworks, and definitions of volunteering are generally too broad to distinguish effectively between formal volunteering and voluntourism activities.

**By introducing a clear definition of voluntourism that differentiates it from formal volunteering, receiving countries can leverage existing volunteering regulations and standards to restrict or even prohibit harmful forms of voluntourism without imposing a substantial new regulatory burden on the government.**

With a defined framework, countries could, for instance, establish straightforward prohibitions on voluntourism in certain high-risk settings while preserving avenues for skilled volunteering in those same settings, subject to rigorous existing regulations and oversight. Current volunteering regulations typically emphasise screening, skills matching and placement, visas, monitoring, and volunteer safety. They also rely on relevant sector-based standards, regulations, and codes of conduct to guide how volunteers interact with children and other community members. Where there are gaps in these sector-based standards, or volunteering regulations, governments efforts could focus on addressing those gaps. This approach is likely to result in greater benefits for children than the development of separate, duplicative regulatory frameworks for high-risk voluntourism activities.

For voluntourism activities that are low-risk or do not involve contact with children, tourism regulation may be sufficient or could be expanded to include voluntourism activities and entities. The analysis of the

case studies showed that many countries have or are developing child-safe tourism frameworks, which incorporate child protection training into accreditation or licensing processes, involve national and local tourism authorities in implementing child-safe policies, and connect to child protection reporting mechanisms and laws on the sexual exploitation of children in travel and tourism. By explicitly defining voluntourism as a form of tourism activity or including voluntourism companies in the types of regulated tourism entities, these activities and entities can be brought under existing tourism regulatory oversight, preventing them from operating in a legal or policy vacuum. Once voluntourism activities and entities are clearly defined in tourism legislation and under the supervision of tourism authorities or regulatory bodies, voluntourism can be fully considered in all tourism related legislative and policy reform efforts, capacity building, training, and awareness-raising initiatives, thus providing a sustainable pathway for strengthening voluntourism regulation over time.

## 4. Multi sector stakeholder engagement and awareness raising promotes multi sectoral action

Regulating voluntourism requires a multi-sectoral approach, often driven by engagement across diverse stakeholders and agencies. Examples from various countries demonstrate the critical role civil society organisations play in raising awareness and supporting government efforts to develop and deliver training on child-safe tourism and voluntourism to key stakeholders. Such awareness-raising and training initiatives frequently generate the political will needed to advance legal and regulatory reforms, while also creating opportunities for civil society organisations to participate in consultations and shape these reforms. In most countries analysed, key entry points for regulation emerged only after sustained efforts in awareness-raising and training had already laid the groundwork within and across voluntourism involved sectors.

**Multi-stakeholder engagement is also essential to address governmental silos and fostering a harmonised, whole-of-government approach to voluntourism regulation. Voluntourism is frequently promoted as an economic activity aimed at enhancing tourism revenue.**

Consequently, the development of voluntourism products and regulatory frameworks often falls under the purview of government departments specialising in tourism and economic development. However, these departments typically lack both the mandate to uphold child rights and the expertise in child protection necessary to ensure that the design and implementation of such initiatives consider their impact on children's rights.

Governmental silos are common and can result in departments with intersecting responsibilities being unaware of or excluded from relevant processes. Multi-stakeholder engagement helps to mitigate these challenges by increasing the visibility of initiatives across government and fostering opportunities for multisectoral collaboration. Such collaboration enables child rights impact assessments to be integrated into the development and regulation of voluntourism, ensuring that children's rights are prioritised throughout the process.

## 5. Regulatory frameworks need to be designed commensurate to the structure of government in each country

The analysis of country-level efforts underscores the importance of strategically aligning voluntourism regulation with the structure of government to ensure effective implementation. Advocates must not only identify the appropriate legal, policy, and regulatory frameworks but also determine which government authorities will be responsible for their implementation and oversight. This understanding can significantly influence the design of regulatory reforms and the selection of stakeholders for awareness-raising and training initiatives.

For instance, in the Philippines, the highly decentralised nature of government and the limited reach of the Department of Tourism, which operates only down to the regional level, prompted a strategic decision to focus on local government ordinances. These ordinances were designed to operationalise the national voluntourism training package at the community level, where voluntourism activities occur. By situating regulation

within the mandates of local child protection mechanisms, this approach ensures a practical framework for implementation, monitoring, and oversight. While such a decentralised approach may take longer to achieve comprehensive regulation across all local government units, it is expected to result in more effective and context-specific implementation. Localised regulation enables tailored responses to community needs and provides mechanisms for sustained oversight of voluntourism activities, making policies more effective in the long run.

In Australia, some voluntourism involved sectors, such as the corporate and charity and not-for-profit sector, are regulated at a federal level, whereas others such as education are subject to state-based regulation. Accordingly, whilst the Department of Foreign Affairs and Trade's Smart Volunteering Campaign was developed at the federal level, dissemination and implementation included engagement with both federal and state-level regulatory bodies across different sectors.

## 6. Engagement of children and youth can create a mindset change towards responsible forms of volunteering

Engaging with children and youth is key to help devise alternative means to support child protection systems, for instance by channelling good intentions of young people towards more sustainable and ethical approaches and giving a meaningful role to child participation in the process. This was demonstrated for example in Norway, where a communication campaign about responsible volunteering was designed with youth

and an educational institution. Such approaches can help young people to choose volunteering opportunities that do not involve contact with children, such as environmental conservation projects, beach clean-ups, or sustainable farming initiatives, to contribute meaningfully to the development of local communities without putting children at risk.

## 5. KEY RECOMMENDATIONS FOR THE GLOBAL UPTAKE

**What are the key parts of the process to address the issue of unregulated voluntourism with children in the respective countries?**

Below are key action points that resulted from the analysis of the experiences and approaches of the selected sending and receiving countries, that can be used by the governments as a practical guidance to take action, and by civil society organisations to advocate for change with governments, business and other organisations offering voluntourism products.

- Clearly **define the issue of voluntourism with children** as distinguished from professional volunteering, to promote only responsible and sustainable forms of volunteering.
- Ensure that all forms of **regulated and professional volunteering include necessary child safeguarding** measures, as children can be at risk of sexual exploitation in organised settings too.
- Raise awareness about the **impacts and risks to all children** resulting from unregulated forms of voluntourism, considering gender and intersectional lens, to influence mindset change.
- **Challenge power dynamics** inherent to voluntourism with children and explore possibilities of joint work with other organisations that address the root causes linked to the “saviourism”.
- **Identify and use the existing entry points** where regulation of voluntourism can be included as part of existing child protection laws and policies, as well as relevant laws and regulations in other sectors, including tourism, foreign affairs, education, travelling sex offenders’ registries, childcare reforms etc.
- **Strengthen multisectoral collaboration** and coordination within countries to eliminate silos and ensure harmonisation across all branches of government. This approach best ensures that children’s rights and best interests are given paramount consideration in the development of all voluntourism initiatives, regardless of whether they are designed as components of economic or tourism growth strategies.
- **Strengthen cooperation within and between sending and destination countries** to curb the demand for unregulated forms of voluntourism, and redirect tourists to meaningful forms of engagement that can support local communities and keep children safe.

## 6. CONCLUSION

**Origin and destination countries that put in place child protection measures in formal volunteering settings, and at the same time regulate the issue of voluntourism with children, can position themselves at the forefront of the Sustainable Development Agenda.**

The journey on which ECPAT network members embarked in Cambodia, the Philippines, Sri Lanka, and Indonesia over the last year, since the launch of the report on regulating the issue of voluntourism at the United Nations General Assembly in 2023, was a pioneer approach testing the existing resources for the most effective ways for their adaptation and implementation at country levels to influence change in their respective countries. These efforts were coupled by the experiences of civil society organisations from origin countries, including Australia, Germany, Ireland, the Netherlands and Norway, that made important strides in ensuring that tourism is safe for children, as the result of reshaping voluntourism practices. Other civil society organisations across the regions from Asia, Africa, Europe and the Americas have been undertaking efforts to influence change to protect children from negative impacts of unregulated voluntourism.

The Global Call for Robust Child Protection Structures in Travel and Tourism continues to be used as a leverage to promote change. In practical terms, the promising practices that were tested on the ground and have been analysed in this global case study reflect actionable approaches that other countries can use as a practical guidance to ACT NOW.

For more information and resources on the topic of voluntourism, please refer to the [Regulating Voluntourism - Resource Hub](#) on ECPAT's website. The resource hub includes materials as well as video messages from sending and destination countries.