

Purpose

Right To Play International (“Right To Play”) is committed to providing a workplace that is inclusive, respectful, diverse and supportive, where all Team Members and Partners are treated with respect and dignity regardless of their race, skin colour, ethnic origin or linguistic background. It is important for us that any one who comes in contact with Right To Play experiences equity and inclusion regardless of their race. The purpose of this Policy is to establish clear standards of expectations for all Team Members and Partners in order to protect Team Members from racist actions or experiences in the workplace.

Scope

This policy applies to all employees / board of director members/ ambassadors/ beneficiaries/ consultants / volunteers / interns / teachers and coaches/ fee-for-service providers, partners and other representatives (collectively called “Team Members”) of Right To Play.

For actions or behaviours directed to beneficiaries, please also refer to the Beneficiary Protection Policy or the Child Safeguarding Policy if the beneficiaries are younger than 18 years of age for more information.

Statement

At the core of who we are at RTP is a diverse, inclusive and respectful organization. The reach of our programs, the diversity of our staff and other RTP initiatives reflect our belief in diversity. We believe that diversity makes our organization stronger. We will continue to strive to be an inclusive and diverse workplace at all levels.

Right To Play is committed to providing a Workplace free of racism in which all Team Members and Partners are treated with respect and dignity. Right To Play does not tolerate subtle or overt acts of Racism, Discrimination, Violence or any other form of mistreatment. This prohibited conduct can occur regardless of the intention of the person who committed it, however it will be evaluated as long as the action or behaviour corresponds to this policy and results in a negative physical or emotional impact on Team Members or Partners.

Right To Play is a global organization present in a number of countries that have different races and ethnic groups. Right To Play values and celebrates the racial and ethnic diversity of its Team Members and Partners.

Racism is any offensive conduct, joke or/and comment in reference to race, skin colour, ethnic or linguistic background. Any act of racism will not be tolerated by Right To Play, regardless of whether it is culturally acceptable. This Policy and its implementation shall comply with the local law applicable to each Right To Play’s office location. Nonetheless, Right To Play may consider a Team Member or Partner’s behaviour to be in violation of this Policy, even if the local law does not consider the given behaviour or action to be unlawful.

Anti-Racism Policy

Racist behaviour is more than overt acts that are racially motivated such as violence against or segregation of ethno-racial groups. Racism could be pervasive and invisible and it continues to negatively impact ethno-racial groups in all aspects of life. Racism is deeply embedded in social institutions and dominant culture. Racism affects everyone in a society, causes deep-rooted pain, humiliation and even death. Racism increases the obstacles to equal participation and protection in private and public life. It impacts education, access to housing, voting, social services and healthcare, jobs, and much more.

Right To Play International also recognizes that women of colour and people with intersectional identities face even more specific barriers because of the intersectionality of racism, sexism and homophobia. Right To Play recognizes that intersectionality of identity (age, ability, location, education, etc.) makes some people more vulnerable than others.

Right To Play has ZERO tolerance for racist behaviours. In essence, Right To Play will not tolerate any act of racism. Any act of racism will be subject to investigation and/or disciplinary action with outcomes which could range from training or warning or suspension or termination of employment or a combination of disciplinary outcomes, depending on the act of racism. Right To Play prohibits all forms of racist behaviours.

Right To Play's Commitment

Right To Play International is committed to providing a workplace free of racism in all forms by:

- Promoting the awareness of and appreciation for all racial, cultural, and linguistic groups where Right To Play International operates;
- Providing an environment free of bias and discrimination, this notably includes any processes, practices, and internal structures;
- Modelling anti-racism practices throughout its operations, ensuring team members are committed to anti-racist communications and culture;
- Providing an environment where equal treatment and respect is mandatory, not just simply encouraged;
- Fostering a workplace culture where there is a safe space to promptly address or report subtle or overt acts of racism and/or discrimination is an obligation;
- Providing various (formal and informal) channels to report incidents, concerns or suspicions of racism and/or discrimination to address issues in a way that team members are most comfortable;
- Being inclusive in the recognition of the diversity of thoughts, experiences, skills and talents of all of our employees;
- Encourage programming to include culturally responsive and culturally specific games which includes but is not limited to: celebration of language, creative cultural expression, and unique cultural and tribal play.

Implementation

These commitments will be actioned on by:

- The Chief People Officer, will ensure that the Global Diversity, Equity & Inclusion Committee (GDEIC) has a diverse representation from across the organization to review processes, practices, and policies;
- The Right To Play GDEIC will review policies every two years to screen for bias and systemic discrimination;
- Country offices are required to create their own DEI committee to address local needs and set team goals. The committee will comprise of the people and culture representative, gender equality focal person, and child protection focal person (at the minimum);
- National offices are required to appoint a DEI representative to address local and team needs;
- All DEI representatives and/or committees in HQ/National/Country offices will be supported by the GDEIC;
- Members of the Global Leadership Team and all staff Managers with supervisory responsibilities are required to support the DEI committee or representative
- People and Culture will identify local legislation, resources (MHPSS, legal, medical, social, mental health) specific to HQs, Country and National offices
 - All Offices will allocate funds for Mental Health and Psychosocial Support for staff
- Providing anti-racism training for all staff
 - Including specialized training for executive team and leadership positions;
 - Ensuring hiring managers are trained on understanding of internal and unconscious bias and how that impacts their view when hiring;
 - Training for new employees and additional training/communication for current employees on the process to report;
 - A refresher course every two years
- Team composition will be reviewed and reported by global leadership annually to ensure commitment to racial/ethnic diversity hiring, which will include a quarterly report on racial/ethnic self-identification on current staff representation and leadership levels to the Executive Team (ET) and annually reporting to the International Board of Directors (IBOD) on same;
- Right To Play will conduct consistent anti-racism staff monitoring and evaluation to check on the status of knowledge and experience;
 - Annual staff survey will be conducted by the GDEIC to receive feedback in relation to their experience with diversity, equity, and inclusion at Right To Play;
 - Managers are accountable to include a diversity, equity, and inclusion approach
- Each leader is required to collaborate with Team Members to understand what methods of communication/ expressions are culturally acceptable
- Right To Play may engage a third-party reporting agency as an option to investigate and respond to reports of racism and/or discrimination;

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- The Chief People Officer will work with leadership and managers to create safe reporting methods within teams and training will include what Leaders and Managers must do if a Team Member reports.

Complaint, Investigation and Disciplinary Procedure Reporting Racist Behaviours:

Team Members should immediately flag or address any racist behaviour observed or experienced by calling the attention of the ‘perpetrator’ to the racist behaviour immediately and requesting that they put a stop to it. A Team Member has the option to resolve the matter directly with the alleged offender, if the Team Member is comfortable doing so, by requesting the alleged offender stop the behaviour in question.

Team members are also required to report all incidents of racism, including if they witness, receive or have been told that another person has witnessed or have been at the receiving end of such behaviours to one of the key contacts listed below. If the person engaging in the behaviour is a Manager (or any other individual to whom a Team Member would have ordinarily reported the incident), the Team Member may report the incident to any of the other key contacts listed below.

Reporting incidents, suspicions or concerns is essential to maintaining a safe, respectful, and inclusive Workplace. When in doubt about whether a particular conduct is racist or not, Team Members and Partners should report.

Right To Play offers the following channels for Team Members and Partners to report any incidents or complaints in the most suitable way:

- Any Manager or member of People and Culture;
- Online, through a confidential, anonymous website at www.clearviewconnects.com;
- Canada or USA: over the phone through Right To Play’s Canada/US dedicated toll-free number: 1-866-921-3463;
- All Other countries: over the phone through Right To Play’s International Collect Call number: +1 905-323-4617; or
- By mail through the confidential post office box at: Clearview Connects, P.O. Box 11017, Toronto, Ontario, M1E 1N0.

Steps to a complaint:

1. You have identified a issue/action/verbal instance that goes against Right To Play’s Anti-Racism policy
2. When possible, write down your experience and your feelings for your personal records
3. Identify who you feel comfortable reporting to:
 - Your Manager
 - People and Culture (P&C Team)
 - Any other manager
 - DEI focal person

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- Confidential and anonymous external: Clearview Connects (numbers and links above on pg. 4)
4. If you need, ask to have a support person/peer in the room with you when you explain the situation
 - Reach out to Right To Play's medical providers for mental health support services
5. Once the reporting is finished, the complaints process involves an investigation into the situation. This is taken very seriously by Right To Play and post investigation, the complainant will be updated on the outcome.

Investigation of Complaints: Complaints of racist behaviours will be promptly investigated by Right To Play. A member of the P&C Team will lead the investigation. All Team Members and Partners are expected to cooperate fully in any investigation. If after the investigation, Right To Play finds that a violation of this Policy has occurred, it will determine what remedial action should be taken to avoid future incidents and to protect all workplace parties. Any Team Member or Partner determined by Right To Play to be responsible for a violation of this Policy will be subject to appropriate disciplinary action. Disciplinary action for violations of this Policy will take into consideration the nature and severity of the violations and may include a verbal or written reprimand, suspension or termination, or termination of partnership.

Nothing in this policy prevents or discourages a Team Member from filing an application with the appropriate human rights authority on a matter related to applicable human rights legislation in their jurisdiction. A Team Member also retains the right to exercise any other legal avenues that may be available.

Steps:

- Any report received by any manager must be brought to the attention of P&C within 48hours
- RTP will strive to commence all complaint investigations within 7 business days
- The 'complainant' and the 'perpetrator' are encouraged to attend the investigation with a colleague that they are comfortable with
- The investigation shall be conducted with at least a member of the P&C Team and a Manager. RTP will strive to ensure that the investigation panel is diverse, including with respect to gender.
- All investigators, or investigation teams, will be required to take notes during the process
- A resolution or conclusion should be drawn within 20 business days and a report should be prepared
- All incidents will be brought to the attention of the Chief People Officer and subsequently shared with the Ethics Committee

.One of the GDEIC Co-Chairs will participate in investigations bordering around DEI.

Communication of Results and Disciplinary/Corrective Action: Following the conclusion of the investigation, the complainant and the alleged perpetrator may be informed in writing of the

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results of the investigation. The complainant and the perpetrator may be informed of any disciplinary and/or corrective action that has been taken or that will be taken as a result of the investigation, and as required by applicable laws.

Confidentiality: To protect the interests of all involved, confidentiality will be maintained throughout the investigation process and staff will be asked to sign a confidentiality agreement. Information obtained about an incident or complaint, including identifying information about any individuals involved, will not be disclosed unless the disclosure is necessary for the purposes of investigating or taking corrective action with respect to the incident or complaint, or is otherwise required by law. However, investigations may require disclosure of certain information to the accused party and to other witnesses in order to gather pertinent facts.

Additionally, while the investigation is on-going, the complainant, the alleged perpetrator(s) and any witnesses should not discuss the incident, complaint or the investigation with each other or other Team Members or witnesses unless necessary to obtain advice about their rights. Any breach of confidentiality will result in disciplinary action.

No Retaliation: Right To Play will not retaliate in any way against anyone who files a complaint in good faith or who acts as a witness in relation to an incident or complaint. Right To Play also prohibits retaliation by any Team Member against another Team Member who makes a complaint in good faith or acts as a witness. Anyone who retaliates against a person for seeking assistance through this Policy, or for filing a complaint in good faith, may be subject to discipline, up to and including dismissal.

Updates to Policy and Program: This Policy and Program shall be reviewed annually, and may be updated from time to time, as appropriate.

What is not considered Racism: Reasonable, respectful action taken by Right To Play or Team Members relating to the management of individuals and activities, such as delivery of negative feedback; application of justified disciplinary measures including written and verbal warnings, suspension, or termination; constructive criticism about work performance (not about personal traits or race); and other actions that constitute legitimate management measures.

Racism excludes respectful and reasonable arguments, disagreements, comments or advice; discussions or actions taken regarding unsatisfactory work performance or inappropriate professional behavior; and other legitimate and justifiable conduct. It also excludes differentiating a person from another based non-prohibited ground of discrimination, such as a **bona fide** occupational requirement when making a hiring decision, or using performance level as a differentiator when establishing merit increases or promotions

Responsibility

Team Members, including Managers, are required to adhere to this Policy and Program and will be held responsible by Right To Play for committing or attempting to commit any racist act.

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All Partners of Right To Play must formally acknowledge, agree and comply with this Policy and Program as a pre-condition for any partnership with Right To Play. Partners who fail to comply with the terms of this Policy will be subject to disciplinary action, up to and including withdrawal of funding and termination of partnership agreements.

The responsibilities of all parties are described in detail below:

Responsibility of Team Members:

- (a) Understand and comply with this Policy, and related procedures;
- (b) Maintain an inclusive Workplace;
- (c) Not engage in or ignore -racist or anti-ethnic, intimidating or other harmful and disruptive behaviours;
- (d) Participate in training programs related to this Policy;
- (e) Promptly report any incident where a Team Member or Partner is subjected to, witnesses, or has knowledge of a violation of this Policy or has reason to believe that a violation of the Policy may occur;
- (f) Fully cooperate in an investigation of incidents or complaints related to this Policy;
- (g) Keep confidential any information regarding the claims, reports or the investigation process; and
- (h) Be aware of main cultural differences before travelling to any new country or region.

Responsibility of Managers:

- (a) Actively promote an inclusive, as well as safe and healthy Workplace, devoid of racist behaviours
- (b) Understand and uphold the principles of this Policy;
- (c) Ensure that Team Members under their authority understand and adhere to this Policy;
- (d) Provide information and instruction on the contents of this Policy through completion of applicable training;
- (e) Promptly respond to, investigate, and report any complaint of violation that has taken place;
- (f) Cooperate and participate in the complaint, investigation and communication process as required;
- (g) Encourage Team Members and Partners to report incidents and complaints related to this Policy;
- (h) Keep confidential any information regarding the claims, reports or the investigation process; and
- (i) Be aware of main cultural differences before travelling to any new country or region.

Responsibility of Right To Play:

- (a) Maintain a safe Workplace, devoid of racist and anti-ethnic behaviours;
- (b) Understand and uphold the principles of this Policy;
- (c) Provide appropriate information and instruction on this Policy to all Team Members and Partners, including Managers;

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- (d) Take all reasonable and practical measures to minimize or eliminate risks of Workplace racist behaviours identified through assessments, surveys, or the occurrence of an incident;
- (e) Respond promptly to all reports of anti-racism, racial discrimination and address immediately all incidents of violation and not condone or permit any behaviour contrary to this Policy;
- (f) Inform complainants and alleged perpetrators in writing of the results of an investigation and any corrective action that will be taken;
- (g) Keep confidential any information regarding the claims, reports or the investigation process.
- (h) Review and evaluate this Policy every year; and
- (i) Prepare an annual accountability report regarding incidents or complaints related to this Policy to be shared with the International Board of Directors, donors and the public.

Responsibility of Partners:

- (a) Comply with this Policy and with all related processes and procedures of Right To Play; and
- (b) Collaborate fully in investigation processes, including providing all relevant information connected to the case, and participating in interviews as required.

Questions

Please contact People and Culture at HQHR@righttoplay.com or the Global Diversity Equity and Inclusion Committee (GDEIC@righttoplay.com) if you require additional information in relation to this Policy.

For more resources, please contact the GDEIC or your People & Culture Representative.

Definitions

Right To Play International adopts the following definitions for this policy and its actions from the Ontario Public Service.

Racism

- The intentional or unintentional prejudice, discrimination, or antagonism directed against a person or people on the basis of their membership of a particular racial or ethnic group, typically one that is a minority or marginalized.

Anti-Racism

- An anti-racism approach is a systematic method of analysis and a proactive course of action. The approach recognizes the existence of racism, including systemic racism, and actively seeks to identify, remedy, and prevent the racially inequitable outcomes and power imbalances between groups, individuals and the structures that sustain these inequities.

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Racial Discrimination

- An act of treating a person or group of people differently because of their race, skin colour, tribe, or membership to a particular group. This could be a one-off action or the result of systems, culture, policy, etc.

Systemic Racism

- Systemic racism refers to organizational culture, policies, directives, practices or procedures that exclude, displace or marginalize some racialized groups or create unfair barriers for them to access valuable benefits and opportunities. This is often the result of institutional biases in organizational culture, policies, directives, practices, and procedures that may appear neutral but have the effect of privileging some groups and disadvantaging others.

Racial Equity

- Racial equity refers to the systemic fair treatment of all people resulting in equitable opportunities and outcomes for everyone. It contrasts with formal equality where people are treated the same without regard for racial differences. Racial equity is a process (such as meaningfully engaging with racialized employees regarding policies, directives, practices and procedures that affect them) and an outcome (such as equitable representation of racialized employees at all levels of the organization).

Inclusion

- Inclusion recognizes, welcomes, and makes space for diversity. Right To Play International celebrates the diversity of thought, experiences, skills and talents of all of our employees.

Intersectionality

- Intersectionality acknowledges the ways in which people's lives are shaped by their multiple and overlapping identities and social locations, which, together, can produce a unique and distinct experience for that individual or group; for example, creating additional barriers or opportunities. In the context of race, this means recognizing the ways in which people's experiences of racism or privilege, including within any one racialized group, may differ and vary depending on the individual's or group's overlapping (or "intersecting") social identities, such as ethnicity, Indigenous identification, experiences with colonialism, religion, gender, citizenship, socio-economic status or sexual orientation.

Diversity:

- Understanding that each individual is unique, and recognizing our individual differences. These can be along the dimensions of race, ethnicity, gender, sexual orientation, socio-economic status or wealth, citizenship, level of education, language, mental health, neuro-diversity, age, physical abilities, religious beliefs, political beliefs, marital status or other ideologies.

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- Diversity aims at the recognition and appreciation of all people regardless of their identity and characteristics.
- Diversity includes all the ways in which people differ, encompassing the different characteristics that make one individual or group different from another.

Equity:

- Understanding that there are varied needs of different groups based on identity and to be impartial
- Equity is promoting justice, impartiality and fairness within the procedures, processes, and distribution of resources by institutions or systems.
- Equity is the fair treatment, access, opportunity, and advancement for all people, while at the same time striving to identify and eliminate barriers that have prevented the full participation of some groups. Improving equity involves increasing justice and fairness within the procedures and processes of institutions or systems, as well as in their distribution of resources.

Partner:

- A person or organization that provides services, has partnerships or engages with Right To Play, including consultants, volunteers who are part of another organization, athlete ambassadors and implementing partners.

Team Member:

- A person who works or volunteers for Right To Play and reports directly to this organization. Includes employees, board members/trustees, interns and volunteers

References

- Ethics Committee Guidelines
- Code of Conduct
- Whistleblower Policy