



RIGHT TO PLAY
PROTECT. EDUCATE. EMPOWER.

Global Safeguarding Policy

Department: All	Position Accountable: President and CEO
	Position Responsible: Chief People Officer and Chief Program Officer
Date created: 10/09/2022	Next Review Date: September 2024
Approval Date: April 25, 2023	Approved by: International Board of Directors (IBOD)

Purpose

Keeping children safe from abuse, exploitation and harm is at the heart of Right To Play's mission, values, strategy and culture. As a child-centered organisation, we want to ensure that everyone who comes into contact with our organisation is safe. No child, youth, adult or vulnerable person should be harmed or placed at risk of harm because of anything we do or neglect to do, intentionally or unintentionally.

This Safeguarding Policy sets out:

- The principles that guide our safeguarding commitments
- What we mean by safeguarding
- The scope of this policy
- Our approach to keeping everyone who comes in contact with us safe
- Our accountabilities and responsibilities

This Policy supersedes the Child Safeguarding (2018), the Beneficiary Protection Policy (2019) and the Sexual Misconduct Policy (2019). Equally, it intersects with our Code of Conduct (2022) and policies on recruitment, gender equality, equal employment and harassment and information technology policy.

Commitment

Right To Play works with some of the most vulnerable children and adults in the world. We recognize the risks inherent in the unequal position of power that we hold vis-à-vis the children and adults who come in contact with us. We are committed to ensuring that our organisational practices and culture are safe for everyone who comes in contact with us and to continuously learning from and improving our safeguarding approaches.

We understand that safeguarding cannot be effective if it is separate from the core of our work. We are committed to integrating safeguarding practices across all that we do and making it central to our organisational culture.

Principles

Everyone who works, volunteers, and partners¹ with Right To Play will, at all times, ensure that they do not abuse the power and trust that we hold as a result of our position as an international development organisation.

Right To Play has 'zero tolerance'² for any abuse, exploitation and harm caused by our people, programs, activities and partners towards anyone who comes in contact with us³, whether through our words, actions or inactions.

We will be guided by the 'Do No Harm' principle. Our people, programs, activities and partners will continuously assess risks of harm to the people we serve, and take actions to prevent, report on and respond to harm.

At all times, Right To Play staff, volunteers and partners will, through their words and actions, demonstrate respect for the rights and dignity of the people we come in contact with, particularly children and vulnerable adults.

In preventing and responding to abuse, exploitation and harm, we will consistently adopt a survivor-centered approach, ensuring that the rights of survivors of actual or potential harm are at the forefront of all actions and that they are treated with dignity and respect.

Right To Play works with diverse people across multiple countries, cultures, abilities, gender and beliefs. While our approach to safeguarding will be inclusive and responsive, all Right To Play staff, volunteers and partners will be expected to adhere to specific behaviours and standards (see below) in line with international principles on safeguarding.

We expect organisations and companies that partner with us to adhere to the same or higher standards of safeguarding as Right To Play. We will work with partners to ensure we share a common understanding and principles and have clear processes for reporting and responding.

¹ See Annex A for more information on what we mean by 'everyone who works, volunteers and partners'.

² See Annex A for more information on what we mean by 'zero tolerance'

³ See Annex A for more information on what we mean by 'people whom we serve'

We understand that, in a constantly evolving world, safeguarding can be complex. We are committed to continuously learning from our experiences and using that learning to improve practice and strengthen culture.

Definitions

Safeguarding is about our efforts to prevent and respond to abuse, exploitation and/or harm against the children and vulnerable adults we come in contact with caused by our staff, volunteers or partners or as a result of our actions or inactions, intentionally or unintentionally. We respond to safeguarding concerns through our internal organisational policies & procedures, and engage with external agencies as appropriate.

Child Protection is about making the world, external to Right To Play, safe for children caused by persons or situations in the community outside Right To Play. We respond to child protection issues through programmatic approaches, often engaging with external partners and organisations.

This policy is specifically about Safeguarding. However, safeguarding and child protection often intersect. How we handle a child protection issue can raise safeguarding concerns and vice-versa. At all times, staff, volunteers and partners need to assess both safeguarding and child protection risks.

Scope of Policy

All Right To Play employees, volunteers, interns, consultants, Board members, suppliers, contractors, and staff and volunteers of any organisation with whom we have a contractual arrangement, whether in countries where we implement programs, countries where we fundraise, headquarters or remotely are required to comply with this Safeguarding policy.

Our safeguarding duty of care extends to:

- Children, young people and vulnerable adults who are served by Right To Play programs, including programs led by partner organisations with whom we have a contractual relationship

- Children, young people and vulnerable adults who come in contact with Right To Play and partner organisations even if not directly served by our programs
- Children and vulnerable adults with whom our staff, volunteers and partners are in contact in their personal lives.
- All staff, volunteers and partners of Right To Play.

All Right To Play systems, procedures and ways of working need to take this Safeguarding policy into account. This includes our systems and procedures to recruitment, onboarding, programming, monitoring and evaluation, data protection, communications, logistics, procurement, information technology, fundraising and partnership.

The provisions of the policy are mandatory and cannot be adapted or changed except with written agreement of the Policy Responsible Person. Implementing some aspects of the policy, (for example, assessing risks and responding to the needs of survivors) will be guided by locally produced procedures based on mapping of the safeguarding environment.

This policy applies at all times, within and outside work hours and in all settings.

Our Approach to Safeguarding

In line with international standards on Safeguarding, Right To Play applies the following approach to prevent and respond to abuse, exploitation and harm by our staff, volunteers and partners towards anyone who comes in contact with us:

Awareness: All staff, volunteers and partners of Right To Play have a responsibility to be aware of the high standards of behaviour and conduct that is expected of them to keep children and vulnerable adults safe from abuse, exploitation and harm in their personal and professional lives. Right To Play will ensure that awareness of Safeguarding responsibilities is embedded across all our recruitment, contracting, onboarding, training, programming, monitoring and operational approaches.

Prevention: Through awareness and good practice, all staff, volunteers and partners of Right To Play will continuously assess risks of abuse, exploitation and harm associated with any of our programs or operational practices and take deliberate steps to minimise and monitor these risks. This will include but is not limited to vetting of staff, volunteers and partners and ensuring program, monitoring and evaluation design and implementation reduces safeguarding risks.

Reporting: Right To Play has, and will regularly review and update, a clear and accessible process for reporting of any safeguarding suspicions or concerns at the global level. Within each country where we work, contextually adapted processes for reporting will be in place. All staff, volunteers and partners know how to report suspicions and concerns, have access to the system and are able to report in way that keeps them and the people concerned safe. All staff, volunteers and partners have a responsibility to report any safeguarding suspicions or concerns within 24 hours of becoming aware of them. Reporting that is done with false or malicious intent will not be tolerated.

Responding: Right To Play will take immediate action to identify and address reports of abuse, exploitation and harm to children or vulnerable adults, and to ensure the safety and well-being of all persons involved, taking a survivor-centered approach and protecting those who report.

To help all staff, volunteers and partners recognise and identify incidents of abuse, exploitation, harm and poor safeguarding practice the following are examples of behaviours and practices that will not be tolerated by Right To Play:

- Physically or emotionally harming or threatening to harm a child or vulnerable adults. This includes beating them, shouting at them, humiliating them, or any other form of physical, psychological or humiliating abuse.
- Engaging in any form of sexual activity with anyone under the age of 18, regardless of age of consent or custom in any country.
- Engaging in sexual activity with any person over the age of 18 who is participating in Right To Play or partner programs or is vulnerable due to power balance (e.g. with community members, volunteers or staff).
- Exchanging money, employment, goods or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviours.
- Sending private messages to children you have met through Right To Play, for example private messaging on social media or by mobile phone
- Engaging in any commercially exploitative activities with children including child labour, modern slavery or trafficking.
- Causing death or serious injury to a child or vulnerable adult due to reckless or careless driving, poor construction, breaking the law or poor planning and safety measures when implementing Right To Play activities or through any other action or omission.

The above is not an exhaustive list of safeguarding breaches.

Accountabilities and Responsibilities

Everyone at Right to Play carries important responsibility for ensuring that all children and vulnerable adults who come in contact with us are safe from abuse, exploitation and harm.

1. All Right To Play staff, volunteers and partners must:

- Commit to not causing harm through the abuse of power, influence, resource, position and opportunity.
- Respect everyone, regardless of who or what they are.
- Adhere to the standards outlined in this Safeguarding Policy and the International Code of Conduct at all times and in all locations.
- Take proactive steps to familiarise themselves with their safeguarding responsibilities, be clear about the behaviours expected of them and understand their role-specific responsibilities.
- Undertake safeguarding training appropriate to their role.
- Contribute to creating and maintaining a culture of keeping children and vulnerable adults safe at all times.
- Report safeguarding concerns and suspicions, using the appropriate reporting procedures, within 24 hours of becoming aware of them
- Not discriminate or retaliate against anyone for reporting such information.
- Not report malicious, reckless or knowingly false statements or allegations
- At all times, adhere to professional boundaries of behaviour and communication in relationships with colleagues and everyone who comes into contact with Right To Play.

2. Senior Leadership and Management

Right To Play's Executive Team, Global Leadership Team and Senior Management Teams in Country Offices, National Offices and at Headquarters carry responsibilities across the six areas below. Safeguarding targets should be included in annual performance agreements for all senior leaders at Right To Play, where appropriate.

2a. Awareness

- Embody, model and advocate for Right To Play's safeguarding commitments
- Establish, maintain and resource a safeguarding framework including values, policies, structures and procedures.
- Ensure that all Right To Play staff, volunteers and partners are aware of and understand their responsibilities, are appropriately inducted and regularly

trained on safeguarding and have confirmed their commitment to safeguarding in writing.

- Appoint and train local safeguarding focal points to assist in safeguarding reporting and implementation within each business unit

2b. Reporting

- Ensure that safe, appropriate, accessible means of reporting safeguarding concerns are made known and accessible to all staff, volunteers and partners.
- Ensure that reporting systems are safe, accessible and inclusive and that those who report are protected from retaliation.
- Ensure that global reporting systems are complemented with local reporting systems that are also compliant with any government regulations .
- Ensure that children, vulnerable adults, community members, partners and people external to Right To Play are aware of and can access effective methods for raising safeguarding concerns

2c. Prevention

- Ensure that safeguarding risks are assessed and appropriate mitigation approaches are integrated into operating procedures across the programmatic cycle from design through to evaluation.
- Ensure that our recruitment, appointment and referencing procedures are based on stringent safeguarding approaches and adopt industry best practices.
- Ensure that IT policies are reflective of our safeguarding commitments and monitor the use of IT equipment to ensure no inappropriate usage occurs.
- Ensure that appropriate informed consents are sought from individuals and responsible adults prior to the gathering and use of images, videos and other communications materials. Ensure that such materials avoid potential or actual harm and respect the rights, safety and dignity of children, communities and vulnerable adults.
- Ensure that safeguarding compliance is integrated into all procedures and relationships with partners including due diligence assessments, contracting, training, planning, monitoring and communications.

2d. Responding

- Ensure that systems and capabilities are in place and appropriately resourced to respond to safeguarding concerns and complaints.
- Ensure that we have clear policies and procedures for investigation and response that are aligned with our commitment on survivor-centered approaches
- Ensure that we have and are applying Standard Operating Procedures and timescales for receiving handling, triaging and investigating reported concerns
- Apply appropriate disciplinary measures to anyone found in breach of the safeguarding policy up to and including dismissal.
- Appoint a designated senior safeguarding officer within the Right to Play and a Trustee at Board level with lead safeguarding roles in order to exercise appropriate governance and accountability in this area
- Develop local procedures based on mapping existing safeguarding infrastructure (risks, legal and judicial, enforcement, support pathways, labour law) that can be drawn upon in the response.
- Make referral of offences to law enforcement and / or local authority the default procedure but be guided by the best interest principles, mapping, legal advice, and the assessment of risks to those involved.
- Offer advice and support to survivors of harm and ensure, at all times, that they are safe, heard and respected.
- Report incidents and their outcomes to the international board and in compliance with national law.

2e. Governance Accountability

- The Board of Directors carry the ultimate responsibility for the strategic aims and implementation of this safeguarding policy. They will delegate that responsibility to the Chief Executive and the two heads of department (People and Programmes) who are responsible for roll out and implementation
- Establish systems to monitor key performance indicators and evaluate safeguarding statistics, progress, challenges and breaches
- Undertake regular reviews and audits of implementation levels and undertake revisions of policy at regular intervals in order to learn from our experience and strengthen our responses

2f. Learning

- Use data and after-action reviews to learn from the continuously develop and strengthen our safeguarding processes, culture and capabilities.
 - Integrate learning into incident and investigation reports.

Related Documents

- Annex A: Definitions
- Annex B: Standard Operating Practices
- Annex C: Reporting – What, When, How
- Annex D: IASC Principles