



**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 partners<sup>1</sup> 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'<sup>2</sup> for any abuse, exploitation and harm caused by our people, programs, activities and partners towards anyone who comes in contact with us<sup>3</sup>, 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.

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

<sup>2</sup> See Annex A for more information on what we mean by 'zero tolerance'

<sup>3</sup> 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

# Safeguarding Policy

## Annex A: Definitions

Staff	Anyone employed by Right To Play whether on full-time or part-time contract, fixed-term, or permanent, and regardless of their seniority or hierarchy, or where they are based.
Volunteers	Anyone who regularly engages with Right To Play as a Trustee, Board Member, intern, volunteer or in any other capacity who is not a full or part-time staff member. Volunteers may be receiving stipends or other non-payroll remuneration.
Partners	Staff or volunteers working with an organisation, company, agency, or other entity that has a contractual arrangement with Right To Play. This can include but isn't limited to suppliers, contractors, consultants, community-based, national or international development organisations, media firms, etc.
Child	Anyone under the age of 18, regardless of the age of consent or age of majority in force in any given country.
Harm	Psychological, physical, emotional, verbal, sexual and any other infringement of an individual's rights
People we serve	All children and adults (including adults who are vulnerable) who benefit or could potentially benefit our programs
Vulnerable adults	Anyone over the age of 18 who is vulnerable to abuse, exploitation or harm either due to any characteristics that they have and/or due to the power imbalance between them and the person causing abuse, exploitation and harm
People who come in contact with us	Includes all children and adults who come in contact with Right To Play and its partners, whether or not they are directly or indirectly served by our programs. For example, children in a school or community where we work but who aren't served by the program or children and vulnerable adults in our personal lives.
Safeguarding	Our efforts to prevent and respond to abuse, exploitation and/or harm against the people and communities we serve. It is considered safeguarding when the abuse, exploitation and/or harm are caused by our staff, volunteers or partners or as a result of our actions or inactions, intentionally or unintentionally.
Protection	Child protection is about making the world, external to Right To Play, safe for children and vulnerable persons. It is considered child protection

	when the abuse, exploitation and/or harm are caused by persons or situations in the community outside Right To Play.
Survivor-centred approach	Focusing on and taking into consideration the survivor's needs and wishes, especially with respect to their safety. However, where there is ongoing risks to others and/or where there the concerns have a potentially criminal nature, the organisation should not be solely led by the survivor's wishes and needs.
Zero Tolerance	Every single safeguarding concern will be fully responded to and, where necessary, prompt action (including conducting an investigation and taking disciplinary action, if applicable) will be taken. We will hold staff, volunteers and partners to the same standards and subject them to the same processes regardless of their position or reputation within the organization.
<b>Definitions of Abuse and Exploitation</b>	
Sexual Abuse	The involvement of a child in sexual activities, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Adult males do not solely perpetrate sexual abuse. Women can also commit acts of sexual abuse, as can other children.
Physical abuse	The non-accidental use of physical force that deliberately or inadvertently causes a risk of/or actual injury to a child, or adult. This may include hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing non-accidental physical harm to a child. Physical harm can also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness or temporary, permanent injury or disability of a child.
Emotional abuse	Involves doing harm to a child's (or adult's) emotional, intellectual, mental or psychological development. This may occur as an isolated event or on an ongoing basis. Emotional abuse includes but is not limited to any humiliating or degrading treatment (e.g. bad name calling, threats, yelling/screaming/cursing, teasing, constant criticism, belittling, persistent shaming etc.), failure to meet a child's emotional needs, and rejecting, ignoring, terrorizing, isolating or confining a child or adult.
Neglect	Includes but is not limited to failing to provide adequate food, sufficient or seasonally appropriate clothing and /or shelter. Also includes failing to prevent harm; failing to ensure adequate supervision; failing to ensure access to appropriate medical care or treatment or providing inappropriate medical treatment (e.g. administering medication when not authorized); or failing to provide a safe physical environment (e.g. exposure to violence, unsafe

	programming location, unsafe sleeping practices, releasing a child to an unauthorized adult, access to weapons or harmful objects, failing to childproof a space that children will occupy etc.).
Exploitation	Describes the abuse of children or adults who are forced, tricked, coerced or trafficked into exploitative activities. The exploitation of children and vulnerable adults includes modern slavery and trafficking of children and children forced or recruited into armed conflict. Sexual exploitation is a form of sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity; (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur with the use of technology. Child sexual abuse and exploitation also includes child early and forced marriage.
Child Labour	Work that deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development. It is work that is mentally, physically, socially or morally dangerous and harmful to children; and interferes with their schooling, deprives them of the opportunity to attend school; obliges them to leave school prematurely; or requires them to attempt to combine school attendance with excessively long and heavy work. If a young person, under the age of 18 is part of an apprenticeship scheme within the statutory law of the country and does not meet any of the above, this would not be considered as child labour. It is not acceptable for any staff or representatives to engage anyone under the age of 18 to work as domestic help in their place of work or at home. Child labour may also be a form of child slavery. Child slavery is the transfer of a young person (under 18) to another person so that the young person can be exploited.



**RIGHT TO PLAY**  
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# **Global Safeguarding Policy Standard Operating Procedures**

March 2023

## Purpose

These Standard Operating Procedures outline the measures required to implement Right To Play's duty of care towards everyone that has an employment contract with Right to Play and anyone that comes into contact with our people and our work. It is our duty to safeguard them from actual and potential harm caused by our organisation through deliberate actions or inadvertently or negligently.

The procedures are grouped into the 6 areas of the Safeguarding Policy and identify the procedures that Director P&C, Global Directors Country Offices (GDCOs), Global Safeguarding Specialist, Country Directors and the Safeguarding Focal Points (program and P&C) must ensure are in place.

## Awareness

The purpose of training and awareness sessions is to ensure that all staff, volunteers, coaches suppliers, contractors and partners are familiar with and understand the mandatory requirements and responsibilities of Right To Play's Safeguarding Policy and Standard Operating Practices.

### **Country / National Directors, HQ Directors and Safeguarding Focal Points must:**

- Ensure that there are designated, experienced safeguarding trainers within the team and that they have access to RTP's agreed safeguarding awareness raising and training resources as well as the time and mandate to deliver the sessions – for all new staff, as refresher training for staff, as part of project inception workshops for partners and staff.
- Ensure that induction, signing of relevant documents<sup>1</sup> and training for staff and appropriate other representatives is routinely undertaken by the trainers.
- Ensure that records are maintained of all trainings and signed declarations included in P&C files.
- Make available and publicise accessible (including local languages/visual depiction) awareness raising literature<sup>2</sup> and posters within the office/programme
- Make available and publicise accessible (including local languages/visual depiction) awareness raising literature and posters at appropriate sites in the field/within communities
- Ensure that all visitors to the country programme are aware of their responsibility to conform with the safeguarding policy and code of conduct and the reporting requirements and procedures within

## Prevention

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<sup>1</sup> See Appendix 1

<sup>2</sup> To include the right to raise concerns, the "no strings attached" nature of assistance and the standards of the Code of Conduct



## **a. Safe Selection, Recruitment and Onboarding Procedures**

**The Director P&C, Global Safeguarding Specialist, Country Director and Safeguarding Focal Points must ensure that:**

- Safeguarding commitments are reflected in job advertisements and job descriptions according to the level of risk of the role
- Screening questions are asked during the selection/interview process
- Reference checking from previous employers (at least 2) includes a question about any safeguarding concerns
- Criminal records are checked, where possible. Where not, an additional reference is taken
- Staff understand and sign to acknowledge the requirements for compliance and the consequences of non-compliance with the code of conduct and safeguarding policies

## **b. Integrating safeguarding into the project cycle**

**All involved in program design, delivery and monitoring must:**

- Ensure that safeguarding risk assessments, planning, safeguarding mitigations, resourcing, monitoring, evaluation and learning is included throughout the stages and mechanisms the programmatic cycle<sup>3</sup> including ensuring that design and delivery decisions appropriately factor in and include adequate resource to prevent mitigate safeguarding risks.
- Ensure that, through awareness and good practice, all staff, volunteers and partners of Right To Play 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.
- Build into program design, delivery and monitoring, specific awareness raising with communities and program participants to ensure they are aware of their rights, our obligations to keep them safe and the mechanisms for reporting any concerns.
- Ensure that decisions to prevent / mitigate safeguarding risks are prioritised (time and attention) at all times and actions taken rapidly to reduce those risks.
- Ensure that all staff, volunteers, coaches, partners and anyone involved with RTP adheres to the Inter-Agency Standing Committee (IASC) Core Principles Relating to Sexual Exploitation and Abuse <sup>4</sup>

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<sup>3</sup> This includes direct programming and also where programming is through partners where a process of due diligence, assessment and agreements should include safeguarding aspects and requirements. Contractor arrangements should similarly be based on risk assessment and agreements which include aspects of safeguarding

<sup>4</sup> See Appendix 4

### **c. Safe Partnerships, Sub-Grants, Procurement and Contracting**

For clarity, this section refers to all individuals, organisations and companies who receive funds from RTP for the delivery of goods and services or for the implementation of activities or research. While RTP will always seek to promote strong safeguarding practices with all partners, we recognise that it is more challenging to require partners with whom we do not have direct contractual arrangements (e.g. Ministries of Education) to fully abide by safeguarding standards.

**GDCOs, Global Partnership Program Directors (GPPDs), Global MEL and Program Development and Quality Director, Country and National Directors, and all staff involved in partnerships, sub-granting, procurement and contracting must:**

- Ensure that all sub-grant agreements, MOUs, purchase orders and contracts include standardised, appropriate clauses that clearly reflect RTP's commitment to safeguarding and the obligations of partners and contractors to abide by those expectations.
- Integrate safeguarding awareness and training into program inception workshops with partners to ensure all partners are aware of safeguarding obligations including reporting requirements and mechanisms. Additionally, integrate safeguarding refresher sessions into annual program reviews with partners and ensure that safeguarding risks are regularly identified and mitigated.
- Where partners have in place a safeguarding policy that adheres, at a minimum, to the 6 core IASC principles (even if it doesn't apply 24/7, for example), partners should be encouraged to use their own policy rather than adopting RTPs. This creates coherence of approach within partner organisations, thus reducing risks. Nevertheless, where RTP is the prime on a grant, clear reporting lines and mechanisms need to be established with downstream partners reporting concerns to RTP within 24 hours of becoming aware of them.

### **d. Safe Digital and Non-Digital Communication Procedures**

**The Director P&C, VP IT, Global Safeguarding Specialist, Country Directors and Safeguarding Focal Points must ensure that:**

Staff, volunteers, coaches and other members of the team including partner staff are aware that they must not access, communicate, share or publish content that may be seen as abusive, obscene, indecent, or offensive. This includes but isn't limited to:

- Accessing, communicating, sharing or publishing offensive or derogatory content relating to sex, gender, race, nationality, disability, sexual orientation, religion/beliefs, age, or any other such trait
- Accessing, communicating, sharing or publishing content that is insulting, hateful, defamatory, threatening, discriminatory, or pornographic
- Behaving in a bullying, intimidating, or harassing manner towards other users, organisations, or page administrators in social media or other forms of digital communication
- Accessing, communicating, sharing or publishing material which contains, or alludes to, unlawful material

- Encouraging anyone to act in contravention of the terms of their award
- Communicating, sharing or publishing material that is spam or promotes or advertises products that have little relevance to the spirit and purpose of RTP

### **e. Safe marketing and communications**

Photos, video and audio are important parts of Right To Play's work. At the same time, their use raises safeguarding risks for children and adults who may be in the images. This is especially the case in fragile contexts where children and adults in the images may be targeted by armed groups or others in their context. Even in calmer contexts, there are individual safeguarding risks of which we may not be aware. For example, if a family has moved from one area to another due to domestic or other local violence, the images we take and use may, inadvertently, mean that they are found by someone who wants to cause them harm.

**VP Marketing/Comms, Safeguarding Specialist, Country/National Directors and MarCom staff must ensure that:**

- Appropriate consent forms are in place and being used across the organisation. The consent of guardians must be sought in writing before any photos, videos, audio or other imagery of children under the age of 18 is taken or used. Adults must be asked for their written consent for their photos, videos, audio and other imagery to be taken or used.
- Ensure that adults signing consent forms on their own behalf or on behalf of children understand how the imagery may be used and consent to that use.
- Children and adults are aware of their right to withhold that consent and that their wishes are respected.
- Particularly where there is heightened security risk (e.g. in areas of conflict or in natural disasters), that any imagery used does not in any way increase risks for children or adults, and must (as always) be based on consent. It is very important to discuss with informed staff in country to understand the particular safeguarding risks and to agree how to mitigate them or to avoid taking photos, audio, video, etc.
- Written, legible consent forms are properly filed and verified before imagery is used.
- Visitors to programs are made aware of the safeguarding risks involved when taking and using photos, video or audio, the importance of consent and where they can and cannot take or use imagery. Visitors must be required to respect the boundaries for taking and using imagery, including on their social media channels.
- Photos, video and audio respect the dignity and cultural norms of all those involved. This includes ensuring that children and adults are appropriately dressed in all imagery, that inappropriate behaviours are not captured, that people are not captured in unbecoming stances. If in doubt, check with staff at the Country Office who will know best what is culturally appropriate or not.

## **Reporting**

**All of Right to Play people and our activities should do no harm. Our staff, volunteers, coaches, consultants and other representatives are required to report any concern or any**

**suspicion that harm and risk is happening either deliberately, by accident or by poor practice.**

There is no expectation that they should only report confirmed facts or evidence. They should not seek to gather further information or investigate themselves. The requirement is to report anything which they genuinely (and not falsely or maliciously) feel may be a breach of the safeguarding policy. It does not have to be a confirmed fact.

Usually these would involve abuse of or exploitation of status and power or a failure to prevent preventable harm. It could also be that relates to a failure to enact policy and procedure requirements.

**The Director P&C, GDCOs, Country/National/Global Directors and Global Partnerships Director must ensure that:**

- Each Country Office, National Office and HQ office has at least one designated, trained Safeguarding Focal Point. In the case of Country Offices, the minimum is 2 Safeguarding Focal Points, one from P&C and one from Programs. Clear TORs for Safeguarding Focal Points must be in place and integrated within their role profile, annual goal setting and annual performance reviews.
- Safe, localised reporting mechanisms are developed, in addition to the global reporting mechanism, and specifically that communities, program participants and partners know how and when to report a concern.
- Ensure that all staff, volunteers, coaches, partners, communities and program participants understand that they must report any concern<sup>5</sup> or any suspicion that harm/ risk is happening either by deliberate acts, by accident or by poor safeguarding practice<sup>6</sup>, that reports must be made in good faith and that all reports will be taken seriously, investigated and handled with appropriate care to ensure the safety of all concerned.
- Ensure that everyone is aware of the reporting mechanisms within the specific office<sup>7</sup> and / or program including through visible / accessible materials.
- That all safeguarding concerns will be communicated with the Chief People Officer and Chief Program Officer within 24 hours of becoming aware of them
- That all partners will be required to report safeguarding concerns to Right To Play within 24 hours of becoming aware of them, where Right To Play is the prime on a grant.

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<sup>5</sup> There is no expectation that they should only report confirmed facts or evidence. The requirement is to report anything which they genuinely (and not falsely or maliciously) feel may be a breach of the safeguarding policy. It does not have to be a confirmed fact, but it is the duty of everyone to report genuine *concerns*. Usually these would involve abuse of, or exploitation of status and power or a failure to prevent harm which is preventable. It could also be that it relates to a failure to enact policy and procedure requirements.

<sup>6</sup> See Appendix 2 for some examples of safeguarding concerns and poor practice

<sup>7</sup> See Appendix 3

- That Right To Play reports any safeguarding concerns to donors, regulatory and statutory authorities in accordance with their contractual and/or statutory requirements.

The procedures below should be followed:

### **Becoming Aware of a Safeguarding Concern**

Staff, volunteers, coaches, etc. may become aware of a concern in a wide variety of ways including (but not only):

- Directly observing an issue
- Becoming aware of an issue through work
- Being on the receiving end of a breach of safeguarding policy
- Receiving a letter, email, social media or other communication
- Hearing something in an informal discussion

### **Collecting information about a Safeguarding Concern**

If a safeguarding concern is disclosed directly to a member of staff, the person receiving the report should bear the following in mind:

- Assess if there is ongoing immediate danger, harm or risk to the person affected which needs immediate assistance or contact with statutory services/police. If there is immediate danger, the person becoming aware of the issue should take reasonable steps to seek assistance to ensure everyone is safe. At the same time, the person receiving the report or becoming aware of the issue should immediately contact the safeguarding focal point, director or the Chief People Officer.
- Assess whether there is a need for immediate medical treatment including treatment for any sexual transmitted diseases or sexual assault. If there is need for immediate medical treatment, the person receiving the report or becoming aware of the issue should take reasonable steps to seek medical assistance for the person harmed and immediately contact the safeguarding focal point, director or Chief People Officer.
- Listen, carefully and attentively. Do not make comment.
- Empathize with the person, make no judgement or criticism
- Establish, what is the issue. Ask who was involved, when did it happen, where did it occur, what happened. (Do not ask why this happened as that will need to be part of an investigation)
- Repeat/ check your understanding of the situation
- Report immediately to your safeguarding focal point, director or Chief People Officer, or use the confidential reporting lines (see the what, when, where to report document)
- Make basic checks on the safety and welfare of those affected

### **Where the complainant asks that you do not share the information**

Right To Play has a responsibility to look into and, where appropriate, investigate all safeguarding concerns. Therefore, staff and others receiving a concern have a responsibility to report it to their safeguarding focal point, director, Chief People Officer or the confidential external lines within 24 hours of receiving it.

Sometimes, complainants may state that they do not wish any action to be taken. In this case, it is important to assure the complainant that they are doing the right thing by raising the concern. Tell them that it Right to Play is committed to being a safe organisation for everyone and that, as such, their concern needs to be looked into. Assure them that the complaint will be treated with utmost confidentiality and that when you report it, it will go to the

safeguarding focal point, director and/or the Chief People Officer who will also treat it with utmost confidentiality. If the complaint is about any of these people, assure them that they will not receive the complaint. Assure the complainant that their safety is very important and that, in looking into the issue, Right To Play will prioritize their safety and will consult with them about it.

All complaints must be reported, confidentially.

### **Making a record of the concern**

The person receiving the report should then document the following information, using a Safeguarding Incident Report Form:

- Name of person making report
- Name(s) of alleged survivor(s) of safeguarding incident(s) if different from above
- Name(s) of alleged perpetrator(s)
- Description of incident(s) Who, Where, When, What
- Dates(s), times(s) and location(s) of incident

This report needs to be marked 'CONFIDENTIAL' and should be password protected. It is important that it is not shared with anyone other than the safeguarding focal point, director or Chief People Officer.

The person receiving the report should then forward this information to the Safeguarding Focal Point, Director or Chief People Officer member within 24 hours. The password should be sent separately from the report. It is important to keep the information confidential and to avoid putting information in the body of the email, especially information about people.

Due to the sensitive nature of safeguarding concerns, confidentiality must be maintained during all stages of the reporting process, and information shared on a limited 'need to know' basis only. Remember that we have a duty of care to both the person/s who may have been harmed and the person/s who may have caused the harm. Both their information need to be treated confidentially.

If the reporting staff member is not satisfied that the organization is appropriately addressing the report, they have a right to escalate the report, either up the management line, to the Board or to an external statutory body.

Confidentiality and strong professional practice will ensure that In the case of a genuine reports, the staff member will be protected against any negative repercussions as a result of this action. Malicious complaints can be referred to disciplinary sanctions.

## **Responding**

**Director P&C, Global Safeguarding Specialist, Country/National Directors must ensure that:**

- All staff are aware that, when they become aware of concerns, they should immediately inform their local Safeguarding Focal Point (SFP), or their line manager, or

Country/National Director. They must not gather further information or investigate themselves.

- The expectation for these staff are to make only an initial risk assessment of ongoing or immediate harm and report available information through the proper channels within the timeframe outlined in the policy
- Conduct further inquiries and investigations by the appropriately trained staff under the arrangements for conducting safeguarding investigations.
- All responses are guided by the principle of survivor-centred approaches and the Do No Harm principle.
- Allegations which are identified as breaches of national law are reported to the relevant authorities and law enforcement agencies unless senior management identify significant risks of further risk and harm as a result of a referral.
- Responses to safeguarding cases are informed by the mapping of the safeguarding environment where criminal and labour law, law enforcement requirements and the available statutory and non-statutory support pathways have been identified.

## Governance and Accountability

**Right To Play's Executive Team, P&C team and Board must ensure that:**

- Mechanisms to report concerns are maintained and regularly checked in terms of their relevance, availability and accessibility.
- Documentation on all cases is maintained in a safe place and cases are reported on as appropriate, including to the International Board.
- Safeguarding policies, procedures, systems and capabilities are in place and adequately resourced.
- Organisational safeguarding risks are regularly integrated in the enterprise risk register and measures are in place to mitigate those risks.
- Key safeguarding indicators<sup>8</sup> are developed, tracked and reported on.

## Learning

**Director P&C, Global Safeguarding Specialist and Chief Program Officer must ensure:**

- Safeguarding agenda items are regularly featured in ET meetings where trends, progress against key indicators, challenges and overview of issues are reviewed with lessons learned guiding further revisions and strengthening of safeguarding practice

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<sup>8</sup> Key Indicators to include Number and percentage of staff received training and refresher training  
Nature and number of concerns and cases reported

- Where appropriate, similar reviews can and should be undertaken at CO/NO levels, always mindful of the critical importance of confidentiality and maintaining the safety of all those concerned.
- Learning from these reviews should be used to strengthen policy and practice.





**RIGHT TO PLAY**  
PROTECT. EDUCATE. EMPOWER.

# **Global Safeguarding Policy**

## **What, When and How to Report**

March 2023

## Purpose

This document lays out Right To Plays global reporting channels for safeguarding concerns. These reporting channels can and should be used by staff, volunteers, coaches and anyone directly engaged by RTP.

External partners such as staff or volunteers working with sub-grantees can also use these channels for reporting concerns.

These channels are not particularly appropriate for community members and program participants to report concerns. Country Offices need to develop safe, appropriate reporting mechanisms for communities and program participants and ensure that they are aware of their rights and the reporting mechanisms. These reporting mechanisms should be approved by the Global Director, P&C and Chief Program Officer before they are put in place.

## What to report

Right to Play staff, volunteers and partners must report any concern or any suspicion that harm and risk is happening either deliberately, by accident or by poor safeguarding practice.

You should:

- Report genuine concerns or suspicions as soon as you are aware of them, even without confirmed evidence.
- Do not seek to gather more information or investigate the issue before reporting.
- Report in good faith. Do not make false or malicious claims.

Examples of breaches of safeguarding policy (not limited to these):

- Observing a staff member shouting at or belittling a child or adult (emotional abuse)
- Being informed that staff of a partner agency is providing assistance in exchange for sexual favours (sexual exploitation)
- Sexually harassing a colleague at work through inappropriate sexualised behaviour (Sexual Harassment)
- Beating a child with whom we work, or your own child at home (physical abuse)
- Becoming aware that appropriate checks in the recruitment process are not being undertaken (breaching safe recruitment practices)
- Sharing and bullying inappropriate social media texts and images with a colleague or a person with whom we work (harassment)
- Becoming aware that a staff member, volunteer or partner is having a sexual relationship with someone under the age of 18 (sexual abuse)

Reports should be made in good faith even if the facts aren't all known.

Staff should not use reporting for malicious or ill-intentioned purposes.

## When to report

Staff and volunteers should report concerns within 24 hours of becoming aware of them.

Concerns will be properly looked into and investigated by appropriately trained staff or external experts. Staff or volunteers reporting should not seek to investigate.

## How to report

All staff, volunteers and coaches everywhere have multiple options for safely reporting a safeguarding concern. If the concern is about a person who would normally receive a report, staff, volunteers and coaches should use a different option to report.

### **Option 1: Reporting through dedicated external, confidential whistleblowing lines**

This option is available to all staff, volunteers, coaches. It can also be integrated into options for reporting by staff and other persons working for a partner organisation.

Email: [www.clearviewconnects.com](http://www.clearviewconnects.com)

This is an online, confidential, secure website that is external to RTP. Clearview will then notify RTP senior leadership in headquarters of the concern.

Telephone: Canada / USA: 1- 866-921-3463  
All other countries: +1 905-323-4617

This is an international collect call number.

Regular mail: P.O. Box 11017, Toronto, Ontario, Canada M1E 1N0

Reports sent through this option are directly sent to the Chief People Officer.

### **Option 2: Reporting to Country/National/HQ Directors and/or Safeguarding Focal Points.**

This option is available to all staff, coaches and volunteers.

- In each CO, there will be at least 2 safeguarding focal points (one in P&C and one in Programs).
- In NOs, there will likely be only one Safeguarding Focal Point.
- At HQ, there will be at least 1 Safeguarding Focal Point in each office (Toronto/London)
- If the concern is about the CD, ND, HQ director or the Safeguarding Focal points, see option 3.
- CDs and NDs can also decide to make this option available for staff and others working with partner organisations.

CDs/NDs/HQ Directors and SFGs receiving concerns must report them to the Chief People Officer within 24 hours of receiving them. Reports should not be directly investigated. This is

because investigations are complex and require skilled expertise, especially to ensure a survivor-centred approach and to safeguard all involved.

Please note that the requirement for rapid upwards reporting is also linked to donor reporting requirements as many donors require initial notice within 72 hours.

### **Option 3: Reporting to a line manager or another trusted senior person in the organisation.**

This option is available to all staff, coaches and volunteers.

- This option can be used at any time. However, the person to whom the report is made must then report it either to the CD/ND/HQ Director/SFP or directly to the Chief People Officer.
- This option is especially useful if the concern is about a CD/ND/HQD or SFP.

### **Option 4: Reporting directly to the Chief People Officer or Global Director, P&C**

This option is available to all staff, coaches and volunteers.

The Chief People Officer can be reached on  
The Global Director, P&C can be reached on

email  
[amugisha@righttoplay.com](mailto:amugisha@righttoplay.com)

## **What happens with reports**

Right to Play takes all reports seriously and will look into them and, where there is initial indication of concern, these will be further investigated by trained experts. F

All reports will be handled with the strictest confidence to safeguard people reporting, people at risk of harm and the alleged perpetrators. Right to Play has a duty of care to all parties.

People who report a concern will not necessarily be informed of any detailed outcomes of inquiries and investigations. This is to ensure the safety of everyone involved.



# Safeguarding Policy

## Annex D

### Inter-Agency Standing Committee Core Safeguarding Principles (2019)

1. Sexual exploitation and abuse by Right To Play staff, volunteers and partners constitute acts of gross misconduct and are therefore grounds for termination of employment or contractual arrangements.
2. Sexual activity with children (persons under the age of 18) is prohibited regardless of the age of majority or age of consent locally. Mistaken belief regarding the age of a child is not a defence.
3. Exchange of money, employment, goods, or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour is prohibited. This includes exchange of assistance that is due to people whom we serve.
4. Any sexual relationship between Right To Play staff, volunteers or partners and a person benefitting from any of our programs that involves improper use of rank or position is prohibited. Such relationships undermine the credibility and integrity of Right To Play's work.
5. Where a humanitarian worker develops concerns or suspicions regarding sexual abuse or exploitation by a fellow worker, whether in the same agency or not, he or she must report such concerns via established agency reporting mechanisms.
6. Humanitarian workers are obliged to create and maintain an environment which prevents sexual exploitation and abuse and promotes the implementation of their code of conduct. Managers at all levels have particular responsibilities to support and develop systems which maintain this environment."

Inter-Agency Standing Committee