



RIGHT TO PLAY
PROTECT. EDUCATE. EMPOWER.

CHILD SAFEGUARDING PACKAGE 2018

Policy	✓ Child Safeguarding Policy Version 5
Forms and Documents	✓ Attestation of Commitment to Child Safeguarding Form ✓ Child Safeguarding Self-Declaration Form ✓ Child Safeguarding Reporting Form ✓ Standards of Practice When Working With Children ✓ Child Safeguarding Photography Guidelines ✓ Photographer/Multimedia Agreement Form ✓ Child Safeguarding Photographic/Media/Editorial Consent Form

Version No.: 5.0	Effective Date: 1-July-2018
Next Review Date: 1-July-2021	Approved By: International Board of Directors



Child Safeguarding Policy

1.0 Statement of Commitment to Keeping Children Safe

Right To Play is an international humanitarian and development organization that is committed to improving the lives of children and youth. Our play-based approach to learning focuses on quality education, health, gender equality, life skills, child protection and building peaceful communities to educate, protect and to empower children and youth.

Right To Play’s vision is to create a healthy and safe world through the power of play. We recognize that we have a fundamental duty of care towards children and we are committed to our responsibilities to keep children safe while they are participating in our programs and activities.

Right To Play’s Commitment to Children

We are committed to the rights, well-being, and welfare of children around the world. We oppose all forms of violence and abuse (including physical, sexual, emotional, and neglect), discrimination, exploitation, and manipulation of children as set out in the United Nations Convention on the Rights of the Child (UNCRC).¹ See Section 7.0 for definitions.

In implementing programs with communities and children, in welcoming, inclusive, and safe environments, we are committed to:

- **Responsibility:** Recognizing that child safeguarding is our responsibility, whether or not our individual roles involve working directly with children and youth;
- **Dignity and Respect:** Thinking of the “best interests of the child” as a guide for decisions and actions and engaging with children in a dignified and respectful way.
- **Accountability:** Actively holding ourselves as Right to Play Team Members as well as Right to Play Partner Team members accountable to child safeguarding commitments and responsibilities;
- **Behaviour:** Acting as role models of child-friendly attitudes, behaviours, and practices;
- **Equality:** Treating all children and youth equally with respect and fairness regardless of age, culture, caste, nationality, creed, ethnicity, health status (e.g. AIDS), physical and psychological ability, family situation, gender, language, racial origin, socio-economic status, religious belief and / or sexual orientation;
- **Participation:** Ensuring that children are able and enabled to express their views on all matters which affect them and their surroundings, they are listened to, are active in decision-making processes, and their views are acted upon;
- **Confidentiality:** Keeping details of the subject of violence and abuse in reported cases confidential, unless where required by law; and
- **Partnership:** Working in partnership with governments, communities, partner agencies, multilaterals, donors, children, and families to promote the welfare, health and development of children, and to protect them from harm.

¹ The Convention on the Rights of the Child is a legally binding international instrument supporting children’s rights to survival, development, participation and protection. The UNCRC was adopted in 1989, and has been signed and ratified by 194 countries.

Version No.: 5.0	Effective Date: 1-July-2018
Next Review Date: 1-July-2021	Approved By: International Board of Directors

2.0 Scope

This Child Safeguarding Policy (this “Policy”) applies to all Right To Play employees, consultants, contractors, coaches, interns, and volunteers employed by or working with Right To Play International; a Right to Play National Office; a Right to Play Regional Office; a Right to Play Country Office; a Right to Play Project Office (all such preceding entities collectively referred to as "Right To Play" or "Right To Play team members") and, to individuals employed by or working directly on a program/project an implementing partner funded by Right To Play (all such persons collectively referred to as "Partner team Members"). This Policy also applies to Athlete Ambassadors, Board members, and any other representatives of Right To Play who are visiting the field (collectively referred to as "representatives").

Right To Play encourages all Team Members, Partner team Members and representatives to take measures to protect all children; however this Policy is meant specifically to protect the children and youth with whom Right To Play works (for any amount of time). It covers instances of violence, abuse, harassment and exploitation that occur inside and outside of project hours and locations that is witnessed, suspected, or enacted by a Team Member, Partner team Members or representative, or as disclosed to a Team Member or representative by a child or other party.

This Policy also applies to Partners, Funders, and Vendors working with Right To Play, as part of a partnership agreement. See section 3.2.8 for further details.

3.0 Roles and Responsibilities

3.1 Responsibility of all Right To Play and Partner Team Members and Representatives

Right To Play embraces its responsibility to provide equal rights and opportunities to all children without discrimination or unequal treatment and to create and proactively maintain an environment that aims to prevent and respond to any actions that place children at risk.

In order to uphold the commitment to keeping children safe, all Right To Play and Partner Team Members and representatives are required to:

- Adopt and abide by this Policy;
- Demonstrate a duty of care to the children with whom they work;
- Report concerns and incidents of violence, abuse, and exploitation of children;
- Respond swiftly and appropriately (refer to steps for responding to abuse) to all suspicions and allegations of violence, abuse, and exploitation while maintaining confidentiality;
- Sign the ***Attestation of Commitment to Child Safeguarding Form in print or digital form***
- Complete and sign the ***Child Safeguarding Self-Declaration Form in print or digital format***;
- Follow Right to Play’s ***Child Safeguarding Photography Guidelines*** when taking photos, videos, and conducting interviews with children;
- Sign the ***Right To Play Code of Conduct***; and
- Everyone is expected to be aware of local formal and informal child protection services.

Version No.: 5.0	Effective Date: 1-July-2018
Next Review Date: 1-July-2021	Approved By: International Board of Directors

3.2 Responsibility of Management

Chief Executive Officer is accountable for ensuring that organizational procedures related to violence, abuse, and exploitation and child safeguarding are integrated into existing management and monitoring systems, procedures, and processes and that all Right To Play Team Members, partners and representatives comply with this Policy. Additionally, progress of the implementation of the Child Safeguarding Policy will be an agenda item for the ET minimum of twice a year.

3.2.1 Recruitment

People and Culture or Hiring Manager where PC is absent will ensure implementation of following recruitment practices for all employees:

- Include organizational commitment to Child Safeguarding in job advertisements;
- Include child safeguarding focused questions in all interviews;
- Conduct 3 reference checks (preferably at least one women referee) that include questions on child safeguarding protocol issues;
- Conduct police record checks to screen for abuse of children prior to employment where available but appropriate²;
- Obtain a completed and signed **Child Safeguarding Self-Declaration Form** disclosing any prior convictions and maintain a database of these forms; and
- Ask employees and volunteers to read this Policy, ask questions to ensure understanding, and obtain their signed **Attestation of Commitment to Child Safeguarding Form**.

3.2.2 Education and Training

All VP's will ensure that:

- All staff will receive Child Safeguarding training at the time of on boarding and will undertake a refresher training each year;
- All representatives of Right To Play team, including interns and volunteers coming in direct contact with children will receive a Child Safeguarding orientation; and
- Child safeguarding training for Country, Regional, HQ and National staff is scheduled and conducted at least every two years.

Country Directors will additionally ensure that:

- A session on this Policy is integrated into all Coach/Teacher/Volunteer foundational training sessions;
- All staff members of partner organizations directly involved implementation of Right To Play funded programs will receive Child Safeguarding policy training at the time of signing partnership agreement and will be provided a refresher training each year; and
- Coach/Teacher/Volunteers sign the **Attestation of Commitment to Child Safeguarding Form** and **Right To Play Code of Conduct** at the end of the training session.

² In some countries police record check may not be a credible sources. In these circumstances, adhere to all other child safeguarding recruitment procedures.

Version No.: 5.0	Effective Date: 1-July-2018
Next Review Date: 1-July-2021	Approved By: International Board of Directors

3.2.4 Implementation

All VP's and Directors (HQ, Regional, and National) will ensure that:

- All team members have specific points in their job description on how the role relates to child safeguarding and keeping children safe in compliance with this Policy;
- Child safeguarding is integrated into all program and organizational risk assessments, and quality mitigation strategies are put in place;
- All direct reports sign the **Attestation of Commitment to Child Safeguarding Form** upon Recruitment and whenever changes are made to this Policy;
- All country programs have conducted child protection community mapping;
- Monitoring and review systems for compliance and reporting are put in place; and
- Financial and Human Resources needs for implementation are identified and met; and
- Follow due process without fail on incident reporting, including identifying, investigating, reporting and appropriately addressing any child safeguarding concerns.

Regional VP's will additionally ensure that:

- Regional Program Directors are designated as Child Safeguarding Focal Points and designation is integrated into their job description (minimum 15% of time)

Country Director's will additionally ensure that:

- Child Safeguarding accountability is integrated into the Program Manager job description (minimum 15% of time) or will identify another member of the Senior Management Team where the role will be integrated;
- A mapping of the formal and non-formal referral system is conducted in the community before a project or program is initiated. This will also include an identification and assessment of local organizations, resources and practices, for keeping children safe; Right To Play practice and response plans have been developed that are in line with our commitment to safeguarding children;
- Contacts are established at a national and/or local level with relevant child protection agencies, Non-Governmental Organizations and community groups providing support on child protection that can provide information, support and assistance to children and staff;
- Children and parents/guardians are informed of the policies and procedures, and means of contacting Right To Play directly for concerns about violence against children, abuse and/or exploitation; and
- Children are provided with information on where to go locally for confidential help and advice in relation to violence, abuse, exploitation, harassment and bullying.

Version No.: 5.0	Effective Date: 1-July-2018
Next Review Date: 1-July-2021	Approved By: International Board of Directors

3.2.5 Communications

All VP's, Directors (HQ, Regional, and National) and Managers/Leads (HQ, Regional, National, and Country) will ensure that:

- All hired personal (stringers³ and consultants) are made aware of the Child Safeguarding Policy and Right To Play's commitment to dealing with communities and children with dignity and respect.
- Professional photographers sign the **Photographer/Multimedia Agreement Form** prior to taking photographs and videos;
- All direct reports are aware of responsibilities for safe maintenance and content published on social media platforms.
- Real names, identity, and location of children are not revealed in communication material
- All Right To Play Team Members and representatives respect the dignity and protect the best interest of the child(ren) and their identity when interviewing, photographing, and developing communications and media pieces, including social media, and when utilizing their likeness in stories and photographs as outlined in the **Child Safeguarding Photography Guidelines**; and
- Obtain completed and signed **Child Safeguarding Photographic/Media/Editorial Consent Form** or verbal consent from the child(ren) and their parent(s)/guardian(s), prior to conducting interviews or taking and using photographs or video footage of children.

3.2.6 Monitoring

HQ People and Culture will ensure that:

- Monitor and respond to reports submitted via the direct Child Safeguarding email address childsafeguarding@righttoplay.com telephone number 001-647-242-7170, or the Clearview reporting procedures outlined in the **Whistleblower Policy**;
- Maintain confidential records of all violence and abuse cases;
- Review violations of this Policy on a regular basis and revise procedures and protocol to ensure the safeguarding of children;
- Annual reporting on key compliance indicators of the child safeguarding policy to the international board of directors; and
- Include completion of Child Safeguarding refresher and training in annual Performance Appraisal forms.

International Board of Directors will ensure that:

- This Policy and its implementation is regularly reviewed and safeguarding cases are shared and discussed:
 - In accordance with changes in legislation and guidance
 - Following any significant organizational changes within Right To Play;

³ A newspaper correspondent not on the regular staff of a newspaper, especially one retained on a part-time basis to report on events in a particular place.

Version No.: 5.0	Effective Date: 1-July-2018
Next Review Date: 1-July-2021	Approved By: International Board of Directors

- Following any issues or concerns raised about the protection of children within Right To Play; and
- In all other circumstances, at least every three years.
- ET members have clearly articulated accountability to Child Safeguarding Policy in their performance agreements.

3.2.7 Reporting

All VP's, Directors (HQ, Regional, National, and Country) ensure that:

- Allegations of violence and abuse are documented in detail and responded to in accordance with the Procedures for Responding to Violence against Children and Child Abuse set out in Section 5.0 below;
- All Allegation, disclosure, suspicion, or observation of violence or abuse of a child or concern of safety or wellbeing of child or young person are reported to Child Safeguarding Focal Point at Right To Play Headquarters or the Clearview Reporting Systems within 24 hours of receipt;
- The People and Culture Child Safeguarding Focal Point will outline the investigative action based on directions from the global Crisis Management team; and
- Contingency funds are allocated to support immediate costs of the incidence.

3.2.8 Partner Organizations, Vendors and Consultant

All VP's, Directors (HQ, Regional, Country, and National) and Managers (HQ, Regional, National,) entering a partnership will ensure that:

- When establishing a partnership agreement or a relationship with implementing partners, and vendors (who are in close contact with children and/or have access to documentation of confidential information related to children), an assessment of the partner's child safeguarding policy and/or practices is completed, and a decision is made whether or not the partner employees or volunteers involved in Right To Play programs will be required to adhere to this Policy;
- All agreements and memorandums of understanding with partners, contractors or other representatives who are in contact with children include a clause stating the partner's commitment to this Policy or their own comparable policy;
- All employees, volunteers and representatives directly involved in the implementing a program/project of partner organization funded by Right To Play or implementing partner organizations participating in Right To Play programs agree to adhere and openly comply to this Policy, or their comparable policy;
- There is a process of engagement with partners on child safeguarding issues to ensure a shared understanding of safeguarding expectations, mutual learning, and development of current best practice; and
- All consultants will be required to adhere to this Right To Play Child Safeguarding Policy and for those who are in direct contact with children or have access to data with children's personal information will be required to produce references from previous employers.

Version No.: 5.0	Effective Date: 1-July-2018
Next Review Date: 1-July-2021	Approved By: International Board of Directors

4.0 Core Standards of Practice

For all Right To Play Team Members Working with Children

- Respond to and report actual or suspected concerns, suspicions or violations regarding any kind of abuse or exploitation by a colleague, family member or community partner. These concerns must be reported in accordance with the systems and policies outlined in this Policy;
- Keep a written record of any injury that occurs, along with the details of any treatment given;
- Ensure that all Right To Play sessions are safe and free from violence;
- Ensure that child rights are protected and that the **Child Safeguarding Photography Guidelines** are followed when photos or videos are being taken of children, or when interviews are being conducted with them;
- Always work in an open environment and avoid being alone with one child. Ensure any private conversation with a child is in plain view of others;
- Obtain written parental or guardian consent if Right To Play is transporting children to a play day event; and
- Secure parental or guardian consent in writing to act in the place of the parent or guardian, if the need arises to administer emergency first aid and/or other medical treatment.

5.0 Procedure for Responding to Violence against Children and Child Abuse

This Child Safeguarding Reporting Process must be followed when reporting a concern for the safety or wellbeing of a child or a breach of this Policy. All Right To Play Team Members, Partner Team Members, and representatives must report any concerns, suspicion, allegation or disclosure they have for the safety and wellbeing of a child. Reports will be handled professionally, confidentially, and as quickly as possible and will meet country specific legislative requirements. Any person who intentionally makes a false allegation or malicious allegation will face disciplinary action. Right To Play reserves the right to terminate any employee, partner, consultant or vendor contract that may result from false or malicious allegations.

Right To Play will treat all concerns raised seriously and ensure that all parties will be treated fairly. Where required an internal investigation will be conducted in regards to an internal report made. In most cases, the Country Director / Regional VP and the Crisis Management Committee (four representatives from the ET) will conduct the investigation. For reports where local authorities are conducting independent investigation, Right To Play staff will fully support the investigation.

Right To Play personnel and representatives must inform their Manager if they believe they or a member of their family may be at risk of harm for making or being part of making a child safeguarding report. When violence or abuse is suspected, witnessed or reported the first step is to ensure safety of the child.

Version No.: 5.0	Effective Date: 1-July-2018
Next Review Date: 1-July-2021	Approved By: International Board of Directors

- Listen to him/her calmly and take him/her seriously;
- Never be alone with the child. If the child prefers to discuss the situation with one individual, ensure a secondary adult is in close vicinity;
- Children should have the option of speaking to a person of their choice or having such a person present.
- Reassure the child that he/she is not to blame;
- Be honest. Do not promise confidentiality. Explain that you may have to share their secret with someone who will be able to help them. Inform the child of the steps you will take. Tell the child you believe them and are glad that they told you;
- Make sure you are clear about what the child says before you report it;
- To ensure trust and comfort of the child, do not write/ tape record information while speaking with the child. When the child is no longer in your presence record what the child said in clear and accurate detail; and
- Maintain a level of confidentiality; only discuss the matter with those necessary to protect the child, do not disclose unnecessary details.

Child Safeguarding Internal Reporting Process

This Process should be followed for reports concerning an alleged breach of the Child Safeguarding Policy, allegations, disclosures, incidents, or suspicions of child abuse having been committed, or concerns/information about the actions or behaviour of Right To Play personnel or representatives. *(See corresponding chart on the next page for detailed internal reporting process)*

Version No.: 5.0	Effective Date: 1-July-2018
Next Review Date: 1-July-2021	Approved By: International Board of Directors

Child Safeguarding Internal Reporting Process

Who can Report?	4	Child or young person	Parents/ caregivers/ community members	Coaches/ Teachers	Representative/ team members/ RIGHT TO PLAY partner member
What to report?	<ul style="list-style-type: none"> • Suspected, witnessed, or disclosed violence or abuse of a child committed by representative/ team member of RIGHT TO PLAY or implementing partner • Concerns about the action or behaviour of representative/ team member of RIGHT TO PLAY or implementing partner that has put or has potential of putting a child at risk of harm • Suspected or confirmed breach of child safeguarding policy and/or code of conduct by representative/ team member of RIGHT TO PLAY or implementing partner • Reported criminal proceeding being undertaken in regards to child exploitation and abuse against representative/ team member of RIGHT TO PLAY or implementing partner 				
When to report?	<ul style="list-style-type: none"> • Immediately or as soon as possible 				
Who to report to?	<ul style="list-style-type: none"> • Children have the option of speaking to a person of their choice (representative/ team member of RIGHT TO PLAY or implementing partner) • Right To Play coaches, teachers, parents/care givers or community members can report the incident to any trusted representative/ team member of RIGHT TO PLAY or implementing partner • Representative/ team member of RIGHT TO PLAY or implementing partner receiving a complaint or witnessing or suspecting violence or abuse of a child will report the incident to their immediate RIGHT TO PLAY Director, functional /regional VP or Clearview reporting system using the Child Safeguarding Reporting Form. • If you are not comfortable reporting the suspected incident of abuse to the above mentioned persons field facilitator, manger or director you should report the incident through anonymous – Clearview Reporting System via www.clearviewconnects.com or phone using the Clearview Right To Play Canada/US dedicated toll-free number 1-866-921-3463 or the Clearview Right To Play International collect call number +1-905-323-4617 or the Clearview Right To Play Skype address xxxxxxxx 				

⁴ Right To Play accepts anonymous reports

Version No.: 5.0	Effective Date: 1-July-2018
Next Review Date: 1-July-2021	Approved By: International Board of Directors

What will happen?

- The Child Safeguarding Reporting form will be submitted to People and Culture Child Safeguarding Focal Point at HQ by email at childsafeguarding@righttoplay.com or via phone to +1 6472427170.
- The People and Culture Child Safeguarding Focal Point will outline the investigative action based on directions from the global Crisis Management team.

Possible outcomes

The outcome of the investigation will vary depending on the findings of the investigation and the nature of violence and abuse suspected, reported, or observed.

Representative/staff or associate of Right To Play

- Meeting with the team or trusted colleagues to discuss the reported concerns and develop clear protective strategies for children
- Identify specific behavioural performance management goals
- Further education/ training on Child Safeguarding policy and code of conduct
- Formal warning and monitoring of behaviour
- Suspension of staff member
- Initiation of criminal investigation
- Report to relevant local authorities and/or police
- Dismissal of staff or disciplinary action to ending relationship with RIGHT TO PLAY coaches, athlete ambassador, or Board members.
- Contractors may have their contract terminated

Representative/staff of Implementing Partner

- Funding freeze for implementing partner pending investigation
- Termination of contract with implementing partner

Follow up

- Where relevant inform the donor agency of the Child Safeguarding Report and action taken
- Where possible provide feedback to those directly involved or affected, while protecting confidentiality and privacy
- Create appropriate linkages with partner organizations to provision need based support services for those directly involved or affected.

External

This Process should be followed for reports concerning the safety or wellbeing of a child or young person involved in Right To Play programs where suspicions, disclosures, or incidents of abuse are enacted by internal or external members. (See *corresponding chart on the next page for detailed external reporting process*)

Version No.: 5.0	Effective Date: 1-July-2018
Next Review Date: 1-July-2021	Approved By: International Board of Directors

Child Safeguarding External Reporting Process

Who can Report?	5	Child or young person	Parents/ caregivers/ community members	Coaches/ Teachers	Representative/ team members/ Partner team member
What to report?	Allegation, disclosure, suspicion, or observation of violence or abuse of a child or concern of safety or wellbeing of child or young person.				
When to report?	Within 24 hours or as soon as possible – if after hours and a child is at serious risk of harm immediately report to appropriate local child protection statutory authority or police.				
Who to report to?	<ul style="list-style-type: none"> • RIGHT TO PLAY Director or functional /regional VP. • If you are not comfortable reporting the incident of abuse to director or functional/regional VP you should report the incident through anonymous – Clearview Reporting System via www.clearviewconnects.com or phone using the Clearview Right To Play Canada/US dedicated toll-free number 1-866-921-3463 or the Clearview Right To Play International collect call number +1-905-323-4617 or the Clearview Right To Play Skype address xxxxxxxx 				
What will happen?	<p>RIGHT TO PLAY Director and functional/regional VP will immediately report to the People and Culture Child Safeguarding Focal Point to seek required support from the crisis management team at HQ.</p> <p>Where required by local law immediately report to relevant local authorities (Police/Child Protection Authorities)</p>				
Possible outcomes	<ul style="list-style-type: none"> • Report made to child protection statutory authority/government department • Report made to community-based child protection committee or similar • Report made to police • Referral made to local support/counselling organizations or service • All parties safety needs must be assessed and responded to – child/young person/family members/person against whom the report is made (representative/ team member/ associate of RIGHT TO PLAY or implementing partner) 				

⁵ Right To Play accepts anonymous reports

Version No.: 5.0	Effective Date: 1-July-2018
Next Review Date: 1-July-2021	Approved By: International Board of Directors

Follow up

- Where relevant inform the donor agency of the Child Safeguarding Report and action taken
- Where possible provide feedback to those directly involved or affected, while protecting confidentiality and privacy
- Create appropriate linkages with partner organizations to provision need based support services for those directly involved or affected.

Definitions

a) **Child:** In accordance with the UN Convention on the Rights of the Child, which has been signed and ratified by all countries where Right To Play currently operates, a child is defined as any person under the age of 18 years.

b) **Child Abuse:** Consists of anything, which individuals, caregivers, caretakers, duty bearers, institutions or processes do, or fail to do, which directly or indirectly harms children or damages their prospect of safe and healthy development into adulthood.

There are four major categories of abuse: emotional abuse, physical abuse, neglect, and sexual abuse. These categories are not mutually exclusive. For example, a child experiencing physical abuse is likely experiencing emotional abuse as well. For expanded definitions and information on how to recognize different types of abuse, please see the *Child Safeguarding Implementation Guidebook*:

1. **Emotional Abuse:** Emotional abuse is the persistent emotional ill treatment of a child, which can cause severe impacts on the child's emotional development. This could include making a child feel worthless or unloved, inadequate or not valued. Potential examples of emotional abuse include: persistent failure to show any respect to a child; constantly humiliating a child by shaming him or her or telling the child they are useless; continually being aggressive towards a child making them feel frightened; or acting in a way which is detrimental to the child's self-esteem.
2. **Physical Abuse:** Physical abuse is when a person purposefully injures or threatens to injure a child. This could include deliberately hitting, shaking, throwing, poisoning, burning, scalding, drowning, suffocating or otherwise harming a child. Physical abuse may also occur where someone knowingly fails to take action to protect a child from physical harm.
3. **Neglect:** Neglect involves the deliberate, persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health and development. As well as being the result of a deliberate act, neglect can also be caused through the omission or the failure to act or protect. Neglect may involve deliberate failure to: provide adequate food, clothing or shelter; protect from physical or emotional harm or danger; meet or respond to basic emotional needs; ensure adequate supervision including the use of adequate care-takers; ensure access to appropriate medical care or treatment; ensure that the child's educational needs are met; or ensure the child's opportunities for intellectual stimulation are met.
4. **Sexual Abuse:** Sexual abuse involves forcing or enticing a child to take part in physically sexual activities, including prostitution, whether or not they are aware of or consent to

Version No.: 5.0	Effective Date: 1-July-2018
Next Review Date: 1-July-2021	Approved By: International Board of Directors

what is happening. This definition also holds whether or not there has been physical contact and whether or not the child is said to have initiated or consented to, the behaviour. Examples of sexual abuse include exposure to sexually explicit inappropriate language or jokes; showing a child pornographic material or using a child to produce such material; inappropriate touching; or sexual activity of any kind with a child. For Right To Play members, sexual activity with children (under the age of 18) regardless of the local age of consent or majority is strictly forbidden.

- c) **Child Protection:** in the international context describes the work being undertaken to strengthen laws, policies, programs and systems, which are designed to protect children in a given country in his or her own family and community.
- d) **Child Safeguarding:** Child safeguarding is the responsibility that organizations have to ensure their staff, operations and programs “do no harm” to children and that any concerns the organization has about children’s safety within the communities in which they work are reported to the appropriate authorities.
- e) **Discrimination of the child:** Any distinction, exclusion, restriction or preference which is based on any ground such as, the child’s or his or her parent’s or legal guardian’s race, colour, gender, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status and which has the purpose or effect of nullifying or impairing the recognition, enjoyment or exercise of all rights and freedoms.
- f) **Exploitation:** Child exploitation is the use of children for someone else’s advantage, gratification or profit often resulting in unjust, cruel and harmful treatment of the child. It covers situations of manipulation, misuse, abuse, victimization, oppression or ill-treatment.

Economic exploitation: The use of the child in work or other activities for the economic benefit of others. This includes, but is not limited to, child labour. Economic exploitation implies the idea of a certain gain or profit through the production, distribution and consumption of goods and services.

Sexual exploitation: The abuse of a position of vulnerability, differential power, or trust for sexual purposes. This includes profiting monetarily, socially or politically from the exploitation of another as well as personal sexual gratification.

Child trafficking: Moving a child within a country, or across borders, whether by force or not, for someone else’s advantage, gratification or profit, is a form of both economic and sexual exploitation.

- g) **Manager:** Includes any Team Member with direct reports.
- h) **Manipulation:** A type of social influence that aims to change the perception or behaviour of others through underhanded, devious and unfair tactics. Manipulation can be used to exploit and abuse children.
- i) **Partner:** Includes any organization with which Right To Play has formed a partnership agreement.

Version No.: 5.0	Effective Date: 1-July-2018
Next Review Date: 1-July-2021	Approved By: International Board of Directors

- j) **Partner Team Member:** Includes individuals employed by or working directly on a program/project an implementing partner funded by Right To Play
- k) **Representatives:** Athlete Ambassadors, board members, and any other representatives visiting the field.
- l) **Right To Play:** Includes Right To Play International, National, Regional, Country, and Project Offices.
- m) **Team Member:** Includes all Right To Play employees, consultants, contractors, coaches, interns, and volunteers employed by, or working with, Right To Play
- n) **Violence Against Children:** all forms of physical and/or emotional ill-treatment, sexual abuse, neglect or negligent treatment or commercial or other exploitation resulting in actual or potential harm to the child's health, survival, development or dignity in the context of a relationship of trust, responsibility, or power.

8.0 Right To Play Child Safeguarding Policy Supporting Forms (Appendices)

1. Standards of Practice When Working with Children
2. Attestation of Commitment to Child Safeguarding Form
3. Child Safeguarding Self-Declaration Form
4. Child Safeguarding Reporting Form
5. Child Safeguarding Photography Guidelines
6. Photographer/Multimedia Agreement Form
7. Child Safeguarding Photographic/Media/Editorial Consent Form

9.0 Right To Play Additional Supporting Documentation

1. Whistleblower Policy
2. Right To Play Code of Conduct
3. Child Safeguarding Implementation Guidebook
4. Child Protection Community Mapping Toolkit
5. Sexual Harassment Policy
6. Gender Equality Policy
7. Partnership Playbook

Version No.: 5.0	Effective Date: 1-July-2018
Next Review Date: 1-July-2021	Approved By: International Board of Directors



Standards of Practice When Working with Children

Right To Play Team Members and representatives **shall adhere to** the following behaviours:

Individual Child

- Place the dignity, wellbeing, health and safety of children foremost, above winning or performance.
- Respond to and report witnessed, suspected, or disclosed concerns regarding any kind of abuse or exploitation by a child, colleague, family member or community partner. These concerns must be reported in accordance with the systems and policies outlined in the Child Safeguarding Policy.
- Respond to emergencies.
- Keep a written record of any injury that occurs, along with the details of any treatment given.
- The health and well-being status of a child, if known, will be kept confidential from all persons other than the child, their parents or guardians, and the relevant Right To Play person.

Activity/Event Practices

- Respect the dignity and wellbeing of children.
- Promote the positive aspects of fair play.
- Treat all youth and children equally with respect and fairness.
- Prohibit foul or abusive language, including teasing or taunting.
- Prohibit the use of gestures or symbols that could be interpreted as offensive or provocative.
- Prohibit the use of banned substances.
- Make sure that all Right To Play sessions are safe, fun and enjoyable and include all who wish to take part in play.
- Ensure that the activities are appropriate to children’s ages, maturity, and ability.
- Recognize the individual capacity and development needs of all children and youth and do not push them to participate in anything against their will.

Personal Practices

- Make sure children are seen and heard; ensure maximum participation.
- Build balanced relationships based on mutual trust that enable children and youth to be empowered and include them in the decision-making process.
- Always work in an open environment and avoid being alone with one child. Ensure any private conversation with a child is in plain view of others.
- Be a good role model of child friendly practices.
- Encourage open communication.
- Take special care and give extra time to children with special needs.
- Provide enthusiastic encouragement and support.
- Exercise a high standard of care toward children.
- Provide encouragement and treat all children equally for their work and during activities.

Version No.: 5.0	Effective Date: 1-July-2018
Next Review Date: 1-July-2021	Approved By: International Board of Directors

- Use positive discipline strategies when working with children.

Parent, Care Taker, Care Giver Involvement

- Request written parental consent if Right To Play is transporting children to a play day event.
- Secure parental consent in writing to act in loco parentis, if the need arises to administer emergency first aid and/or other medical treatment.
- Involve parents, guardians, and other community members where possible and inform them when problems arise.

Photographs, Films and Video

- Right To Play reserves the right at all times to prohibit the use of photography, film or video at any event or activity with which it is associated.

Right To Play Team Members and representatives **are prohibited from** any of the following behaviours:

- Inappropriate touch: Any form of improper touch is prohibited. This includes doing things of a personal nature for children that they can do for themselves.
- Illegal or offensive conduct: Any form of sexual, physical, verbal or emotional harassment, assault or abuse is prohibited for all Right To Play Team Members and representatives. This includes behaving in ways intended to shame, humiliate, or belittle children. Any sexual activity with children (under the age of 18) regardless of the local age of consent or majority is also strictly prohibited.
- Being too familiar or too close: Avoid showing favoritism, giving special attention or personally rewarding specific children. Treat every child equally and maintain a supportive, friendly, *and* safe distance both physically and emotionally.
- Doing anything with a child in private or not visible to others: To eliminate the perception and situations of misconduct, all contact with children must be known to, supported by and in full view of others.
- Displaying a poor attitude: Encouraging fair play towards the play activity is essential.

Version No.: 5.0	Effective Date: 1-July-2018
Next Review Date: 1-July-2021	Approved By: International Board of Directors



Attestation of Commitment to Child Safeguarding Form

I, _____, have read, understood and agree to fulfill my commitments and responsibilities, and abide by the contents of Right To Play's Child Safeguarding Policy.

Name: _____

Sup. Name: _____

Signed: _____

Signed: _____

Date: _____

Date: _____

Version No.: 5.0	Effective Date: 1-July-2018
Next Review Date: 1-July-2021	Approved By: International Board of Directors



Child Safeguarding Self-Declaration Form

Part A

If you need more space to enter your details, or wish to give additional information, please use a separate sheet.

PERSONAL DETAILS

Surname: _____

First Name(s): _____

Date of Birth: _____

Gender: Male Female _____

Address: _____

_____ Postal code: _____

E-Mail: _____

Home telephone number: _____

Mobile telephone number: _____

Please list any previous organizations that you have played/worked/volunteered for:

	Organization	Date
1.	_____	_____
2.	_____	_____
3.	_____	_____
4.	_____	_____
5.	_____	_____

Version No.: 5.0	Effective Date: 1-July-2018
Next Review Date: 1-July-2021	Approved By: International Board of Directors

Part B

Right To Play aims to promote equality of opportunity for all persons and welcome participation from a wide range of individuals. The position for which you have applied requires that all prior criminal convictions be declared. If you fail to disclose an offence and Right To Play or any affiliated organization is later informed of any undisclosed criminal matter, you may be subject to disciplinary action. Evaluation of information is based on strict confidentiality and discretion. Information disclosed will not necessarily preclude your engagement with Right to Play. Right to Play respects and adheres to all applicable human rights legislation.

1. Have you ever been convicted of any criminal offences or accepted any reprimands or cautions or police warnings?

Yes

No

If yes, please provide details of any criminal convictions (date, conviction/reprimand)

2. Are you a person known to any social services department as being an actual or potential risk to children or young people?

Yes

No

If yes, please provide details: _____

3. Have you ever had a disciplinary sanction (from any sports or other organization's governing body) relating to child abuse?

Yes

No

If yes, please provide details (date, incident, and follow up)

I understand that it is necessary for me to declare any information requested and that the position for which I have applied may involve access to children, young people and/or vulnerable adults. I hereby give my consent to Right To Play for it to conduct a police record check, including if applicable, a vulnerable sector screening.

Name: _____ [please print]

Signature: _____ Date: _____

Version No.: 5.0	Effective Date: 1-July-2018
Next Review Date: 1-July-2021	Approved By: International Board of Directors



Child Safeguarding Reporting Form

(Fields marked with a * are mandatory) *Please complete as much information as possible. Note the report should not be delayed because the reporter does not have all of the information. If you do not have all the specific details under each section to fill the form, please complete as much as you can in each section.*

Report Details (include current date, time, and location)

* Date		* Time		* Place	
--------	--	--------	--	---------	--

Referrer's Details

* Name		* Job Title/Role	
* Phone number		E-mail	
Address		*Relationship to the child	

Child's Details

* Name		* Address (or best contact information)		Age	
				*Gender	
Other relevant information (school, teacher, disability, religion, etc.)					

***Details of concern (in child's words if child reported the case):**

***Details of incident (if applicable):**

Version No.: 5.0	Effective Date: 1-July-2018
Next Review Date: 1-July-2021	Approved By: International Board of Directors

*Current Safety of Child:

*Is this a medical emergency?

*Witness to the incident:

*Actions to Date:

*Any Other Information:

Completed By: _____ [Printed Name] _____ [Signature] _____ [Date: MM/DD/YYYY]

Version No.: 5.0	Effective Date: 1-July-2018
Next Review Date: 1-July-2021	Approved By: International Board of Directors



Child Safeguarding Photography Guidelines

Right To Play Child Safeguarding Policy – Statement of Commitment to Keeping Children Safe

Right To Play is an international humanitarian and development organization that uses play and quality education to empower children and youth and enable them to overcome the effects of poverty, conflict, and disease in disadvantaged communities. Right To Play’s vision is to create a healthy and safe world through the power of play. We recognize that we have a fundamental duty of care towards children and we are committed to our responsibilities to keep children safe while engaged in our programs and activities.

Governing Right To Play’s use of visual images, both photographic and video, is an overriding principle to maintain respect and dignity in our portrayal of children, youth, coaches, volunteers, and teachers. We are committed to the wellbeing and welfare of children and oppose all forms of discrimination and exploitation of children, manipulation, violence and abuse of children as set out in the UN Convention on the Rights of the Child.

The following outlines the principles employed to regulate and monitor Right To Play’s use of images.

I. To respect the subject, Right To Play:

- Requests written consent from children prior to taking and using photographs or video footage of children, youth, coaches, parents, volunteers, teachers, family or community members whenever possible; Requests verbal consent from children when written consent is inappropriate in the context or not possible due to circumstances such as literacy levels and ability.
- Develop user-friendly contextually and culturally appropriate photography/multimedia agreement form in accessible formats (e.g. local language) to share with children for consent. Provide an overview of the content of the form in user-friendly language verbally.
- Seeks written consent from parents or guardians for photos or videos taken of children;
- Takes photos with children that portray, in a dignified and respectful way, children’s engagement in Right To Play activities and not in poses that are submissive or attire that could be perceived as sexually suggestive;
- Gives special consideration to photographs or videos depicting children with disabilities, refugees and those in situations of conflict and disaster to accurately portray context and maintain dignity at all times;
- Provides explanation for the use of photos or videos;

Version No.: 5.0	Effective Date: 1-July-2018
Next Review Date: 1-July-2021	Approved By: International Board of Directors

- Refrains from taking photos or videos of those who decline;
- Ensures images are honest representations of the situations and do not script children to say things in order to please the interviewer.
- Protects the identity of children by using only their first name or replacing it entirely.

II. Right To Play does not:

- Use images that are erotic, pornographic, obscene or convey suffering;
- Digitally or otherwise manipulate a photograph or video in a way that distorts the reality of the subject or situation; and
- Misrepresent projects, people or events in the use of images (e.g., we will not use an image of one project to illustrate the work of another).

How Right To Play Ensures Compliance

In accordance with the **Child Safeguarding Policy**, children are photographed taking into consideration their views and without being put in any compromising situation visually or verbally.

Children who are partially clothed are not photographed or captured on video. To ensure alignment with our brand personality, and adhere with our commitment to portraying children with dignity and respect.

Where photos are published with captions or accompanying stories that identify the child by name and location, the child’s name is altered to protect their identity and a note included to acknowledge their name has been changed.

Consent is obtained, prior to taking photos of children and youth using the *Child Safeguarding Photographic/Media/Editorial Consent Form*. Permission is acquired from all individuals before publishing photos. In some situations, such as the instance of a Play Day in which hundreds of children attend, this is not always possible. In these situations, measures are taken to not single out an individual child when taking photographs.

Photographers are obliged to adhere to these guidelines when taking photos of children participating in Right To Play play-based activities and sports programs. To protect the integrity of the child (ren) photographers must read and sign the ***Photographer/Multimedia Agreement Form***, which indicates that he or she has read and agrees to adhere to the conditions outlined in these guidelines and Right To Play’s **Child Safeguarding Policy**.

Version No.: 5.0	Effective Date: 1-July-2018
Next Review Date: 1-July-2021	Approved By: International Board of Directors



Photographer/Multimedia Agreement Form

Right To Play is an international humanitarian and development organization that is committed to creating a healthier and safer world, by promoting every child’s right to play and that harnesses the power of play to empower children to overcome adversity.

Right To Play is an international humanitarian and development organization that uses play and quality education to support children and youth to empower themselves and enables them to overcome the effects of poverty, conflict, and disease in disadvantaged communities. Right To Play’s vision is to create a healthy and safe world through the power of play. We recognize that we have a fundamental duty of care towards children and we are committed to our responsibilities to keep children safe while engaged in our programs and activities.

We are committed to the rights, well-being, and welfare of children around the world. We oppose all forms of child exploitation and child abuse, including physical, emotional, sexual abuse and neglect of children.

We believe that every child has the right to protection from abuse irrespective of age, culture, caste, nationality, creed, ethnicity, health status, physical and psychological ability, family situation, gender, language, racial origin, socio-economic status, religious belief and / or sexual orientation. Recognizing the risks to children and our responsibility to keep them safe during humanitarian emergencies and as a part of longer-term development efforts, Right To Play’s **Child Safeguarding Policy** aims to ensure a safe and positive environment for children with whom Right To Play works with at any point in time.

Right To Play considers the **UN Convention on the Rights of the Child** as the basis for its **Child Safeguarding Policy**. Since Right To Play offers programs in different countries around the world, Right To Play’s **Child Safeguarding Policy** takes into consideration local laws, customs, and traditions.

Having read and understood the above, the undersigned hereby:

1. Recognizes the need to ensure the wellbeing and protection of all children during Right To Play activities and events.
2. Accepts Right To Play’s **Child Safeguarding Photography Guidelines** and will follow this guidance when taking and using images of children (persons 0-18 years of age).
3. Takes every effort to ensure that the images taken are used for the sole purposes they are intended and to highlight the work Right To Play is doing in various countries, and the joys of play and games.
4. Agrees that the images may be published on Right To Play’s international and national websites as well as in all other marketing material produced by Right To Play.

If you become aware that these images are being used inappropriately and/or have any questions, please contact Right To Play International Manager of Communications via email: @righttoplay.com

Media Outlet or affiliation:

Right To Play Contact Person:

Country/Town Programme Name:

Date of visit: _____

Signature: _____

Version No.: 5.0	Effective Date: 1-July-2018
Next Review Date: 1-July-2021	Approved By: International Board of Directors



Child Safeguarding Photographic / Media / Editorial Consent Form

Right To Play is a global organization that uses the power of play to support children to learn and empower children facing adversity.

I assent to the collection and use of my personal images and personal information in:

1. Film photographs
2. Digital photographs
3. Motion picture footage
4. Audio recordings
5. Editorial capturing

I understand these Materials may be used on Right To Play’s websites, Facebook, Instagram, and Twitter pages and in newsletters and publications, as well as shared with donors and readers.

I understand that my image, personal information and words may be used by the Right To Play staff and/or the media for promotional materials that will be shared in the future.

I understand Right To Play has the right and permission to copyright and use, re-use, publish, and republish the Materials in all forms of media for art, promotional purposes (including, but not limited to, advertising, publicity, commercial, or display use), illustration, exhibition, editorial, trade, or any other purpose whatsoever in Canada and around the world.

I give up any right to examine or approve the completed Materials or their use(s). The person taking my photo, video or story will check all of the information with me to make sure that it is right.

I have read and fully understand what I am assenting to. If I had any questions I asked the person taking my photo or story.

.....

[Name of child]

[Location: Address Town/City, Province, Country]

.....

[Phone]

[Email]

[Signature of child]

[Name of parent/guardian]

[Signature of parent/guardian]

[Date].....

Version No.: 5.0	Effective Date: 1-July-2018
Next Review Date: 1-July-2021	Approved By: International Board of Directors



This policy applies to all Right To Play Employees, Volunteers, Interns, Consultants and other representatives¹ (hereinafter collectively referred to as “Team Members”) working with Right To Play International and its National, Regional and Field Offices (hereinafter collectively referred to as “Right To Play”).

INTERNATIONAL CODE OF CONDUCT

The provisions of this Code, as set forth in Sections 1 through 8 below, are mandatory. Team Members are expected to fully comply with these provisions under all circumstances. The Code affirms the organization’s commitment to uphold high moral and ethical standards. It specifies the basic norms of behaviour for those who are involved in representing it.

Team Members who sign this Code are responsible for complying with it.

1. Child Protection

Team Members must comply with the Child Protection Policy of Right To Play.

Right To Play is committed to the welfare of children around the world. We oppose all forms of:

- discrimination and exploitation of children
- manipulation
- violence and abuse, including sexual child abuse (commercial and non commercial)

as set out in the UN Convention on the Rights of the Child.

Right To Play embraces its responsibility to provide equal rights and opportunities to all children without discrimination or unequal treatment on the grounds of their age, culture, caste, nationality, creed, ethnicity, disability, HIV status, family situation, gender, language, racial origin, socio-economic status, religious belief and/or sexual orientation.

In order to uphold the commitment to keeping children safe, all Team Members have:

- a duty of care to the children with whom we work
- an obligation to meet minimum standards of protection for the children in our care
- the responsibility to report concerns of abuse of children (see “Reporting a Violation...,” page 7).

¹ Representative means any person who is acting on behalf of Right To Play.

2. Financial Reporting and Accounting

Team Members must ensure that Right To Play's books and records reflect the transactions and disposition of assets of the organization in an accurate, fair and timely manner.

Team Members must have all transactions authorized, executed and recorded in accordance with the instructions of Management² to permit the accurate preparation of financial statements and to maintain accountability for assets.

Team Members are permitted access to assets only in accordance with the authorization of Management. Management and Team Members are to record and disclose all assets and funds. Team Members are strictly prohibited from the use of the organization's funds or assets for any unlawful or improper purpose. Those responsible for the accounting and record-keeping functions are required to be vigilant in ensuring enforcement of this prohibition.

3. Theft, Embezzlement, Fraud

Team Members must not steal or remove from the property, without authorization, anything belonging to Right To Play, employees, visitors, or contractors.

This could include money, cheque, money order, inventory, merchandise, supplies, tools, equipment, documents, data, software, copyright, information or ideas (intellectual property).

4. Manipulation or Falsification of Data, Records, Reports, Contracts

Team Members must not, whether authorized or unauthorized, manipulate, falsify or forge data, dollar amounts, statistics, narratives, or other information on any reporting form or screen, report, statement, letter, document, or contract.

This might include changes made to:

- hide mistakes
- cover up fraud
- gain personal, departmental, or organization advantage by improving statistics or results
- gain unfair advantage (or cause harm) to an employee, supplier or customer.

² Management are persons who have management authority within Right To Play. They may be called Country Manager, Program Manager, Regional Director, National Director, Deputy Director, etc.

5. Violation of Laws, Regulations, Policies, Procedures

Right To Play and its Team Members shall comply fully with all lawful requirements applicable to the work of the organization and the country of operation.

Many of Right To Play's activities are subject to complex and changing laws, depending on the country where they are operating. Whenever a Team Member is in doubt about the application or interpretation of any legal requirement, he or she should refer the matter to Management who, if necessary, should seek the advice of the organization's legal counsel.

6. Unethical Conduct and Conflict of Interest

a. Team Members must maintain a level of personal conduct that will not reflect negatively on themselves or on the credentials of Right To Play.

In varying measure, each Team Member represents the organization in his or her relations with others such as partners, suppliers, other Team Members, governments, or the general public. The organization expects each Team Member to act in a manner that will enhance Right To Play's reputation for honesty and integrity, whether at home or abroad.

All Team Members are expected to conduct themselves in a responsible manner at all times. This expectation includes a requirement to avoid:

- excessive use of alcohol
- the use of illegal drugs or mind altering substances
- the use of abusive or culturally insensitive language, and
- a promiscuous lifestyle

that directly and negatively affect other Team Members and the reputation of Right To Play as a whole. Furthermore, while posted overseas Team Members understand that it is not appropriate to, and accordingly shall not, engage in personal relationships with local staff members and beneficiaries of Right To Play programming, to a degree that would create a distraction, obligation or dependency on the part of either party in the relationship.

b. Team Members shall not furnish to other persons, directly or indirectly, expensive gifts or provide excessive entertainment or benefits on behalf of Right To Play.

Team Members, whose duties permit them to do so, may furnish modest gifts, favours and entertainment to persons, other than public officials, if all of the following conditions are met:

- they are not in cash or other negotiable instruments
- they cannot reasonably be interpreted as a bribe, payoff or other improper payment and are of nominal value
- they are made as a matter of general and accepted business practice
- they do not contravene any law and are made in accordance with generally accepted ethical practices
- proper accounting is made
- their provision would not in any way embarrass Right To Play or its recipients, if subsequently disclosed to the public.

Team Members are required to report to Management all gifts given of a value greater than \$100 CAD or relative local equivalent.

c. Team Members shall not use their employment status to obtain personal gain from those doing or seeking to do business with Right To Play.

Team Members should neither seek nor accept for themselves:

- gifts
- payments
- services
- fees
- special advantage not available to other members of Right To Play or members of the general public
- special valuable privileges such as pleasure or vacation trips or accommodations or loans from any person (except, in the case of loans from persons in the business of lending and then only on conventional terms) or from any organization or group that does, or is seeking to do, business with Right To Play or any of its affiliates.

However, Team Members may accept modest gifts, favours or entertainment provided that standards are met consistent with the conditions relating to the giving of gifts set forth in Section b above.

Team Members are required to report to Management all gifts accepted of a value greater than \$100 CAD or relative local equivalent.

d. All dealings between Team Members and public officials are to be conducted in a manner that will not compromise the integrity or reputation of any public official or Right To Play or its affiliates.

Even the appearance of impropriety in dealing with public officials is unacceptable. Team Members are expressly forbidden to participate in any bribes, kickbacks, illegal gratuities, indirect contributions or similar payments, whether directly or indirectly. It is of the utmost importance to Right To Play that Team Members maintain a high standard of integrity.

Team Members may not give even an inexpensive gift or a modest entertainment or benefit to a public official unless:

- he or she is authorized by the International Board of Directors or duly authorized designate (an Executive Team Member at Right To Play headquarters) to do so, and
- it complies with the conditions prescribed by the Board in that regard and with the conditions set out in Section b above.

The furnishing of such gift, entertainment or benefit may be open to the interpretation that it is furnished illegally to secure the public official's use of his or her influence.

If a Team Member is told that it is necessary to make payments directly to public officials in a country of assignment to facilitate the legitimate operations of Right To Play, the decision on making such payments will be done only by Team Members specifically authorized to do so by the International Board of Directors or duly authorized designate. Team Members shall report each such payment without delay to the Board or duly authorized designate, together with the reason therefore.

e. Right To Play considers certain records, reports, papers, plans or proposals as being strictly confidential in nature. The organization forbids Team Members to reveal this

information to individuals or groups apart from the organization without receiving proper authorization.

Right To Play is a publicly funded organization. It is the practice and belief of the organization that Team Members, private donors and outside funding institutions should have access to normal information concerning the organization's operations, both programmatic and financial. As a result, Right To Play has developed comprehensive and responsible methods of disclosure. However, the organization maintains as strictly confidential, information that may impair its ability to operate effectively in a competitive environment, or which might infringe upon the private rights of individuals, enterprises or institutions. Team Members are therefore prohibited from divulging confidential information to anyone without receiving prior authorization, except as required in the performance of their duties, or as required by law / Court order. Whenever a Team Member is in doubt as to whether certain information is confidential, or whether such information should be divulged, no disclosure should be made without first consulting the Executive Team at Right To Play headquarters.

f. Team Members must avoid all situations in which their personal interests conflict or might conflict with their duties to Right To Play.

Team Members should seek to avoid acquiring any interests or participating in any activities that would tend to:

- deprive the organization of the time or attention required to perform their duties properly
- create an obligation or distraction which would affect their judgment or ability to act solely in the organization's best interest.

In certain instances, ownership or other participation in a competing or complementary enterprise might create or appear to create such a conflict. Team Members are required to disclose in writing to Management all business, commercial financial interests or activities that might reasonably be regarded as creating an actual or potential conflict with their duties of employment. They must make this disclosure immediately when such activities commence.

Every Team Member who is charged with executive, managerial or supervisory responsibility must ensure that actions taken and decisions made within his or her jurisdiction are free from the influence of any interests that might reasonably be regarded as conflicting with those of Right To Play. Team Members must act in such a manner that their conduct will bear the closest scrutiny should circumstances demand that it be examined. Team Members must avoid not only actual conflicts of interest but the very appearance of conflict.

7. Health and Safety Environment

Team Members of Right To Play must ensure that dangerous or potentially dangerous situations, conditions or practices are identified and discontinued, such as those which might affect the health or safety of other employees, customers, suppliers, contractors, visitors, or neighbours.

All Team Members must use a preventative approach to health and safety. Each Team Member is responsible for regular workplace health and safety inspections. Each must

report unsafe conditions or practices to Management. Each must fully document and report in writing to Management any workplace health and safety incidents.

These procedures also apply to items both on the organization's property (e.g., dangerous workplace, equipment or practices) and off the organization's property (e.g., unsafe driving practices by organization's drivers or failure to adequately secure loads on trucks).

8. Harm to People or Property

Team Members must adhere to the policy of Right To Play which is to provide a work environment free of violence, discrimination and harassment in which individuals are accorded equality of employment opportunity based upon merit and ability.

Right To Play will not tolerate discriminatory practices based on any ground protected by applicable human rights laws which may include but may not be limited to: race, sex, colour, national or ethnic origin, religion, marital status, family status, age, sexual orientation, disability, ancestry, citizenship, creed, record of offences or any other characteristic protected by applicable legislation. Team Members are entitled to freedom from sexual solicitation and harassment as well as all other forms of harassment in the workplace.

It is not a discriminatory practice to make a distinction between persons based on bona fide occupational requirements (e.g., a driver requires a Driver's License, and cannot be appointed without one). Since bona fide occupational requirements are narrowly defined, Team Members should not undertake such distinctions without first obtaining express authorization from Management.

Right To Play will not tolerate verbal or physical attack on a colleague or any other person within the working environment.

Team Members must not abuse any property, premise, equipment or inventory through carelessness. Right To Play will not tolerate:

- any purposeful vandalism or damage to any property or premise
- sabotage of processes, operations or events.

Right To Play requires Team Members to exercise reasonable care when using property and equipment and in conducting the work of the organization.

Distribution

Right To Play will provide all Team Members with a copy of this Code. The Team Member's supervisor will answer any questions as to the Code's application to the area of responsibility and jurisdiction of the Team Member to ensure a proper understanding of the Code.

At commencement of employment and at least once a year thereafter, each Team Member shall sign the prescribed form of acknowledgment. The head of the department will retain this form. He or she shall confirm annually to senior management that each such Team Member under his or her jurisdiction has completed the required form. This confirmation

acknowledges that the Team Member has read or reread, as the case may be, the current version of the Code of Conduct.

In addition, in cases where, as an alternative to employment, an individual:

- is engaged under contract to provide services to the organization
- has managerial or supervisory responsibilities, or
- deals on the organization's behalf with government officials, or
- has access to confidential information

such individual will be provided with a copy of this Code and shall sign the prescribed form of acknowledgment. In connection with the provision of services to the organization, this Code shall apply to such individuals fully as if he or she were a Team Member of Right To Play.

Consequences of Violation of this Code

Failure to comply with the Code can have severe consequences for both the Team Members involved and Right To Play. If it is confirmed that anyone associated with Right To Play contravenes this code, the organization will impose appropriate discipline which may include:

- disciplinary action up to and including dismissal for staff
- ending of a volunteer relationship
- possible withdrawal of funding/support
- termination of a contract.

Furthermore, Team Members whose conduct violates the Code may also be violating domestic and foreign country laws. Such conduct can subject both Right To Play and the Team Members involved to prosecution and legal sanctions.

Reporting a Violation of the Code of Conduct

Right To Play has established a world-wide critical incident confidential reporting system through ClearView Strategic Partners Inc. This web-based system instantly provides critical incident data to key decision-makers in headquarters and in the regions. The system time stamps all reporting as it is logged into the system. Authorized staff can then extract information to oversee and manage the confidential investigations and actions.

Right To Play expects any Team Member who becomes aware of a violation of the Code to exercise their duty of care and report that information immediately:

- to Management, or
- online through a confidential secure website at www.clearviewconnects.com, or
- Canada or USA: over the phone through the **Right to Play Canada/US dedicated toll-free number: 1-866-921-3463**, or
- All Other countries: over the phone through the **Right to Play International Collect Call number: +1 905-323-4617**, or
- by mail through the confidential post office box at:
P.O. Box 11017
Toronto, Ontario
M1E 1N0

The accountable manager will review the information and initiate an investigation where necessary.

It is a serious violation of this Code to discriminate or retaliate against Team Members for reporting such information.

It is a serious violation of this Code to report malicious, reckless or knowingly false statements or allegations.

Reference Documents

Right To Play Whistleblower Policy
Right To Play Confidentiality Agreement
Right to Play Child Safeguarding Policy
Right To Play Equal Employment & Harassment Policy

Form of Acknowledgment

I acknowledge that I have received a copy of the Right To Play Code of Conduct dated March 2009 and that I have read (or reread) it this year. I fully understand the provisions of the Code of Conduct and acknowledge and accept that:

- my continued employment or engagement will be dependent upon my compliance with Right To Play's rules and policies as set forth in the Code of Conduct
- my failure to comply can result in termination of employment or engagement without notice.

I also understand that I have an obligation to report any violation of these rules and policies in the manner set forth in the Code of Conduct.

I further acknowledge that Right To Play may revise the Code of Conduct at any time and I agree to comply with any revisions to the Code of Conduct.

Name of Team Member

Signature of Team Member

Location

Date

Witness