



Room to Read Policy

Policy Name: CHILD PROTECTION POLICY AND CHILD PROTECTION CODE OF CONDUCT

Policy Owner: Chief Executive Officer

Revision Date: September 2022

Policy Number: 101WW

Purpose:

Room to Read's goal is to provide children with quality educational opportunities. It is important that no program of Room to Read enables the abuse, harm, neglect, or exploitation of children. Room to Read has zero tolerance when it comes to child abuse and exploitation and believes that all children have equal rights to protection.

Applicability:

This Policy affirms Room to Read's commitment to the education and welfare of children and their protection from abuse and exploitation. This Child Protection Policy ("Policy") and Child Protection Code of Conduct applies to Room to Read Representatives and their interactions with children and Room to Read Participants.

"Room to Read Representatives" includes all worldwide employees, board members, volunteers, interns, vendors, contractors and implementation partners, as well as any Room to Read approved visitors to Room to Read programs.

Room to Read defines a "child" or "children" as any individual under the age of 18, regardless of the applicable local age of majority or consent.

"Room to Read Participants" include all children and young people who are actively participating in Room to Read programs, regardless of their age¹. Any reference in this policy or code of conduct to "child" or "children" includes all Room to Read Participants.

Please refer to your office's Child Protection Implementation Manual for additional details on procedures.

Principles:

1. Room to Read has zero tolerance for child abuse and exploitation.
2. All children have the right to be free from abuse and exploitation, including neglect, maltreatment, and physical, mental or sexual violence, injury or abuse.
3. All children should be treated with respect and dignity.
4. The well-being of the child is Room to Read's first priority when dealing with all identified or suspected cases of child abuse.
5. Room to Read shall integrate child protection into all its organizational strategies, structures and work practices.

Policy:

Room to Read is committed to the education and welfare of children and protecting them from abuse and exploitation. Room to Read has zero tolerance for child abuse and enacts the following Procedures in furtherance of the Purpose and Principles stated above.

¹ This would include, for example, active Girls' Education Program Participants who are 18+.

Procedures:

Room to Read will meet its commitment to protect the safety, privacy and dignity of Room to Read Participants through the following measures:

Awareness

Room to Read will ensure that Room to Read Representatives are informed of Room to Read's commitment to protecting children.

- Room to Read will ensure that Room to Read Representatives have access to a copy of this Policy and that Room to Read Representatives, as appropriate, read, sign and abide by Room to Read's Child Protection Code of Conduct.
- Orientation and onboarding materials for all new Room to Read personnel and implementation partners, will include a review and in-depth discussion of this Child Protection Policy, the Child Protection Code of Conduct and Room to Read's commitment to child protection.
- Room to Read will provide periodic and ongoing training and learning opportunities to ensure the commitments stated in this Policy are met.

Prevention

Room to Read will take measures to minimize the risks of abuse or exploitation of Room to Read Participants posed by Room to Read Representatives.

- Room to Read's staff recruitment process will utilize recruitment and selection measures designed to minimize the risk of recruiting persons who may pose an unacceptable risk to Room to Read Participants. When available and lawful, Room to Read will require pre-employment background checks for Room to Read staff members and will not knowingly engage anyone or permit anyone to work whose background or history would suggest they pose a risk to children's safety or well-being.
- Room to Read will only partner with organizations that comply with child protection standards in their programs and activities at least as high as Room to Read's and will include the Child Protection Code of Conduct in contracts with vendors and partners.
- Room to Read will ensure that where any Room to Read project or site visit involves contact with children, Room to Read Representatives will read, sign and follow the Child Protection Code of Conduct.
- Room to Read will use children's images or likeness in a manner that protects the safety, privacy and dignity of each child. Room to Read will seek to have the necessary approvals prior to filming or taking pictures of the child. Room to Read will take measures to prevent transfer of a child's personal information outside of Room to Read. (See related Communications and Image Policy 103WW.)

Reporting

For all reported incidents of suspected child abuse² or violation of this Policy or the Child Protection Code of Conduct, Room to Read requires that the child's best interest be the first priority. All incidents must be dealt with promptly and kept confidential, to the extent possible, and in a manner that does not harm the victim or the person reporting it.

- **Internal reporting:** Violations or suspected violations of abuse or this Child Protection Policy or the Child Protection Code of Conduct should be reported within **24 hours** of a Room to Read Representative learning

² In cases where a Room to Read Representative is informed of or witnesses any suspected form of child abuse by a non-RtR representative, they will follow these same procedures. Room to Read leadership will determine appropriate next steps on a case by case basis.

of a violation or suspected violation. Reports may be made through a number of channels: Country Director or Project Manager, any People Operations personnel, any supervisor, General Counsel, or through the reporting channels provided under the Whistleblower Policy.

- **External reporting:** Depending on local laws and regulations, Room to Read may also be obligated to report suspected cases of child abuse or exploitation to local authorities where it operates. Each Room to Read office will document country-specific standard procedures in the Country Specific Child Protection Implementation Manual, that includes a list of relevant local laws and local procedures necessary to ensure compliance with those laws. Room to Read will cooperate with local authorities investigating reports of child abuse.

Responding

All reports of child abuse, exploitation or a violation of this Policy or the Child Protection Code of Conduct will be treated seriously and handled professionally. All responses and decisions shall be made in the best interests of the child.

- All reports of child abuse received by Room to Read must be immediately forwarded to Room to Read's General Counsel and the Director of People Operations³, who will determine the appropriate next steps.
- Any Room to Read employee who fails to report known or suspected child abuse or violations of this policy immediately, shall be subject to disciplinary action, up to and including termination.
- Room to Read will not coerce, intimidate, or retaliate in any way against anyone who in good faith reports any form of known or suspected child abuse or exploitation, or provides any information or other assistance in an investigation.

Rules of Child Interactions:

It is expected that all Room to Read Representatives treat each child they come in contact with in a respectful and dignified manner. To this end, Room to Read expects all Room to Read Representatives to abide by the following guidelines. A Room to Read Representative shall:

- Not abuse or exploit any child;
- Not engage in any form of sexual activity, act, or relationship with an active participant of Room to Read programs or a child under the age of 18 regardless of the age of majority or consent under local law or local custom. Mistaken belief of the child's age is not a defense;
- Not use language or behavior that is discriminatory, harassing, abusive, sexually provocative, demeaning or culturally inappropriate;
- Treat each child with respect and dignity and ensure that children are allowed the same access to Room to Read's programs and resources regardless of caste, race, color, sex, gender, sexual or gender orientation, language, religion, political or other opinion, nationality, ethnic or social origin, property, disability, birth or other status;
- Act sensibly and sensitively in any communication that involves children, including listening and responding to Room to Read Participants;
- Use all computers, mobile phones, social media, and video or digital cameras in a lawful manner, and never use them for exploitation or harassment or to access child pornography;

³ In the event one or more of the holders of these positions is implicated in a report, a report can be made directly to the Chief Financial Officer or Chief People and Technology Officer.

- Not accept or make “friend requests” on any social media platform from/to any Room to Read Participant. Always exercise caution and professional judgment when communicating with an unknown social media request or a person you have reason to believe is under the age of 18.
- Not hire or use children for domestic or other labor which may be inappropriate or illegal, regardless of local practice; and
- Take seriously any reports of actual or suspected child abuse.

It is important for Room to Read Representatives working in contact with Room to Read Participants to:

- Be aware of and manage situations which may present risks of child abuse or exploitation;
- Plan and organize the work and the workplace to minimize risks of child abuse or exploitation;
- Facilitate a culture of openness to enable any issues or concerns of child abuse or exploitation to be raised or discussed;
- Facilitate a culture of accountability within the organization so that poor practice or potentially abusive or exploitative behavior does not go unchallenged; and
- Report any known or suspected activity that, if true, is child abuse, exploitation and/or a violation of this Child Protection Policy or the Child Protection Code of Conduct.

Accordingly, when working directly with Room to Read Participants, the following additional rules apply.

When dealing with Room to Read Participants, a Room to Read Representative shall:

- Ensure that another adult is present when working in the proximity of Room to Read Participants, unless prior notification of their manager of the arrangement is obtained;
- Not use physical punishment or discipline;
- Not single out any Room to Read Participant with special attention or gifts;
- Not initiate or engage in physical contact with any Room to Read Participant, including hugging, touching, kissing, blocking of normal movement or any contact which is or may be unwanted or perceived as culturally inappropriate. When initiated by a child, physical contact, such as a hug or touch, must be brief, appropriate and non-sexual; and
- Not invite a Room to Read Participant into their home, whether for a day visit or overnight, without the express permission of the child’s parent or guardian, advanced notification of the visit to Room to Read, and presence of another Room to Read staff member.

Consequences for Violations:

Room to Read Representatives who violate the Child Protection Policy or Child Protection Code of Conduct will be subject to disciplinary action, up to and including termination of employment, engagement, contract or other relationship with Room to Read.

Contact Department:

Any questions regarding this Child Protection Policy or the Child Protection Code of Conduct shall be directed to the Chief of Staff.

Related Policies

Anti-Trafficking Policy 102WW; Whistleblower Policy 202WW; Communications and Image Policies 103WW



Room to Read Child Protection Code of Conduct

To be presented to all Room to Read employees, board members, volunteers, interns, vendors, contractors, implementation partners, and any Room to Read approved visitors to Room to Read programs (hereinafter, referred to together as “Room to Read Representatives.”)

It is expected that all Room to Read Representatives treat each child¹ they come in contact with in a respectful and dignified manner. Room to Read expects all Room to Read Representatives to abide by the following guidelines to protect children and young people who are actively participating in Room to Read programs, regardless of their age (hereinafter referred to as “**Room to Read Participants**”²). A Room to Read Representative shall:

- Not abuse or exploit any child;
- Not engage in any form of sexual activity, act, or relationship with an active participant of Room to Read programs or a child under the age of 18 regardless of the age of majority or consent under local law or local custom. Mistaken belief of the child’s age is not a defense;
- Not use language or behavior that is discriminatory, harassing, abusive, sexually provocative, demeaning or culturally inappropriate;
- Treat each child with respect and dignity and ensure that children are allowed the same access to Room to Read’s programs and resources regardless of caste, race, color, sex, gender, sexual or gender orientation, language, religion, political or other opinion, nationality, ethnic or social origin, property, disability, birth or other status;
- Act sensibly and sensitively in any communication that involves children, including listening and responding to Room to Read Participants;
- Use all computers, mobile phones, social media, and video or digital cameras in a lawful manner, and never use them for exploitation or harassment or to access child pornography;
- Not accept or make “friend requests” on any social media platform from/to any Room to Read Participant. Always exercise caution and professional judgment when communicating with an unknown social media request or a person you have reason to believe is under the age of 18.
- Not hire or use children for domestic or other labor which may be inappropriate or illegal, regardless of local practice; and
- Take seriously any reports of actual or suspected child abuse.

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- Not invite a Room to Read Participant into their home, whether for a day visit or overnight, without the express permission of the child’s parent or guardian, advanced notification of the visit to Room to Read, and presence of another Room to Read staff member.

Reporting

A Room to Read Representative who learns of an actual or suspected case of child abuse or violation of this Child Protection Code of Conduct shall report the incident in the following manner:

- Violations or suspected violations of abuse or this Child Protection Code of Conduct should be reported within 24 hours of a Room to Read Representative learning of a violation or suspected violation. Reports may be made through a number of channels: Country Director or Project Manager, any People Operations personnel, any supervisor, General Counsel, or through the reporting channels provided under the Whistleblower Policy including emailing whistleblowerhotline@roomtoread.org.
- In addition to reports to Room to Read, Room to Read Representatives may report child abuse or exploitation that would be a violation of law to local authorities.
- Room to Read will promptly relay to local authorities any report it receives that, if true, would be a violation of law. Room to Read will cooperate with local authorities investigating reports of child abuse.

Use of Room to Read Children’s Images or Likeness: The use of the child’s image or likeness must protect the safety, privacy and dignity of each child. No commercial use of a Room to Read Participant’s image or likeness may be made without express permission from the child’s parent or guardian and Room to Read. (See related Communications and Image Policy 103WW.)

I understand that it is my responsibility, as a person engaged by or representing Room to Read, to use common sense and avoid actions or behaviors that could be construed as child abuse or exploitation when undertaking Room to Read activities. I also understand that a breach of Room to Read’s Child Protection Code of Conduct constitutes an act of misconduct and is grounds for disciplinary action, up to and including termination of employment, engagement or other contractual relationship.

NAME (please print)

SIGNATURE

DATE