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Executive Policy Sponsor:	Theme Director, Infection, Immunity and Global Health	Date Approved	August 2024
Approval Authority:	Chief Operating Officer	Next Review Date:	August 2026

1. Overview and Purpose

Murdoch Children's Research Institute Global Health Strategic Initiative works across a range of contexts to conduct research that supports the health outcomes of children and young people.

Safe environments for staff, research and program participants, their families and members of the wider community who engage with our people and activities is a fundamental commitment of the MCRI Global Health Strategic Initiative.

The purpose of the Prevention of Sexual Abuse and Harassment (PSEAH) Framework (the Framework) is to set clear standards and layout procedures to support our commitment to prohibit, prevent and protect against sexual exploitation, abuse and harassment. This Framework supports the safeguarding of adults. The Child Safety Policy and Child Safety Procedure outlines the approach of MCRI to safeguarding and responding to instances of sexual exploitation (including child exploitation material), abuse and harassment of anyone under the age of 18.

This Framework has been endorsed by the Theme Director, Infection, Immunity and Global Health, Chief Operating Officer and the Head of People and Culture, MCRI.

Scope and Application to Personnel

This Framework applies to both salaried, and non-salaried employees of MCRI. The Framework extends to all Contractors, Volunteers, Students, Honorary and Affiliate appointments, Collaborators, Contractors, Sub-Contractors and to any other person who is notified that this Framework applies to them. For the purpose of this Framework, the term 'people' is used to refer to those in scope for this Framework.

All people, and collaborators engaged across activities that receive funding from the Department of Foreign Affairs and Trade; World Health Organization; UNICEF or fall under the requirements of the Australian Council for International Development's Code of Conduct, must comply with the PSEAH Framework. This Framework is designed to prevent instances of SEAH and respond to concerns involving MCRI people and collaborators, and does not cover concerns in the wider community, not perpetrated by MCRI people or collaborators.

2. Framework Context

MCRI Policy Context

This Framework is in place to support existing MCRI policies, not replace them. Key Policies and Procedures that are supported by this Framework are identified below:

- **Sexual Discrimination, Sexual and Sex-based Harassment Policy:** While the purpose of this Framework highlights the importance of safety for all people, participants, families and community members, sexual discrimination and harassment for people in line with the Sex Discrimination Act 1985, Fair Work Act 2009, and other relevant Australian legislation are managed under this policy.

- **Child Safety Policy:** This Framework forms key components of MCRI's approach to safeguarding and should be read in conjunction with MCRI's Child Safety Policy and Child Safety Procedure. All instances of sexual exploitation, abuse or harassment (SEAH) involving children are addressed through the Child Safety Reporting Procedure contained in the Child Safety Procedure.
- **Code of Conduct:** MCRI's Code of Conduct prohibits all forms of sexual exploitation, abuse, and harassment.

Global Health Context

In the development of this Framework, the requirements and conditions of funding key Global Health partners have been addressed, including but not limited to the:

- **World Health Organization (WHO):** MCRI is in official and formal relations with the World Health Organization, including operating WHO Collaborating Centres, and MCRI people act as technical advisors to the World Health Organization, including through Agreed Performance of Work (APWs). This Framework ensures compliance with the WHO Policy on Preventing and Addressing Sexual Misconduct.
- **Australian Council for International Development (ACFID):** MCRI is a signatory to the ACFID Code of Conduct, including commitments to advance the safeguarding of those who are vulnerable to sexual exploitation and abuse.
- **Department of Foreign Affairs and Trade (DFAT):** MCRI is an Australian Government Department of Foreign Affairs and Trade (DFAT) partner and is expected to apply the DFAT PSEAH Policy commensurate with the level of SEAH risk associated with the activity and our organisation. The Framework has been developed to align with the DFAT Minimum PSEAH Standards
- **NHMRC National Statement of Ethical Conduct in Human Research:** The [NHMRC National Statement](#) outlines the ethical standards and conduct for all researchers and institutions engaging in research, as well as review bodies involved in ethics reviews.

3. Principles

Leaders are committed to building a strong safeguarding culture

PSEAH is the responsibility of all MCRI people at all levels of the organisation.

The Board and Executive are responsible for setting cultural standards and modelling clear standards of behaviour in their interactions at work, monitoring the impact and progress of the implementation of this Framework, including barriers to implementation. Overall accountability to ensure MCRI activities reduce risk and support safe environments sits at Board and senior leadership level.

MCRI Group Leaders, Team Leaders and People Leaders champion ethical and professional standards that actively seek to prevent SEAH and to uphold the rights of all parties with whom we engage.

Safeguarding is a shared responsibility

MCRI expects all people to act with integrity, and to create and maintain safe, inclusive, and equitable environments. PSEAH is the responsibility of people at all levels of MCRI, with each member of MCRI expected to uphold their individual responsibilities, consider PSEAH risks and identify and respond to concerns.

MCRI requires partners to comply with and supports partners to work to the standards set out in this Framework and the MCRI Code of Conduct. MCRI is committed to ensuring an understanding of the partners' PSEAH capacity throughout our working relationship.

MCRI recognises that an organisation's culture is shaped by all stakeholders. MCRI is committed to ensuring that all people, research and program participants and all those who have contact with our activities understand the standards MCRI sets for all people.

MCRI encourages feedback from all people, partners, children, young people, and adults with whom we engage. We are committed to continual improvement by welcoming feedback and complaints.

Zero tolerance for all forms of sexual exploitation, abuse, and harassment

A zero-tolerance approach to SEAH involves ensuring that prevention and risk management is a priority in all aspects of our work, from design through to evaluation.

A zero tolerance does not mean zero reports or incidents. Zero tolerance means that all instances of concerns, suspicions, allegations, and complaints are taken seriously, and responded to without fear of reprisals. All people are required to report suspected or actual SEAH incidents, breaches to this Framework, or related Code of Conduct breaches via the PSEAH Reporting Procedure. Non-reporting will be viewed as a serious breach of this Framework which may lead to the termination of engagement with MCRI.

Agreements include clauses regarding the reporting on and implications of non-compliance with this Framework. Procedural fairness is an essential part of MCRI's reporting, response, and investigations processes.

Victim/Survivor-centred approach

A 'do no harm' approach is central to MCRI's commitment to the safety of all people and external stakeholders.

A victim/survivor centred approach means that, always, MCRI prioritises the rights, needs and wishes of the victim/survivor in line with procedural fairness requirements; ensures victim/survivors are treated with dignity and respect; provides victim/survivors with accessible and comprehensive information; and involves victim/survivors in decision-making throughout the response process.

Understanding and Responding to Power Imbalances

MCRI people work in situations where they will find themselves in real or perceived positions of power, trust and authority over those with whom we work.

Gender inequality, and other systemic health and social inequities are present in the contexts in which MCRI works. Inequality contributes to power imbalances, creating opportunities for SEAH to occur. As such, MCRI must take all reasonable actions to identify and articulate existing power imbalances and implement strategies to prevent power abuses. These considerations are aligned with ethical standards of research¹, and guide the provision of accessible safeguarding information to stakeholders; engagement of stakeholders on PSEAH approaches, and building safe, trusted and confidential complaints mechanisms.

4. Framework Accountabilities

Accountabilities in line with specific PSEAH strategies are laid out in [Section 5](#), and [Appendix 2](#) of this Framework.

Accountabilities for ensuring this Framework is communicated, implemented, complied with, and reviewed are outlined below:

Role	Responsibility
Audit, Finance and Risk Committee	Ongoing monitoring of the implementation of the Framework through organisational risk reporting
MCRI Executive	Monitoring the implementation of PSEAH strategies
Global Health Leadership Team	Monitoring the implementation of this PSEAH Framework Ensuring all relevant people are aware of the PSEAH Framework

¹ *National Statement on Ethical Conduct in Human Research: Chapter 4.3 (2023)*, Australian Government, National Health and Medical Research Council

Chief Operating Officer	Review and endorsement of the PSEAH Framework
Theme Director, Infection, Immunity and Global Health	Review and endorsement of the PSEAH Framework
MCRI Project Lead	<p>Ensuring all relevant people are aware of their project roles and responsibilities in relation to this PSEAH Framework</p> <p>Ensuring all relevant people receive appropriate induction and training in line with the requirements of this PSEAH Framework</p> <p>Ensuring projects implement and comply with PSEAH requirements in line with this Framework</p>
All people	<p>Comply with the PSEAH Framework at all times</p> <p>Identify, control, monitor and treat SEAH risks in line with this Framework</p> <p>Immediately report all concerns, suspicions and incidents in accordance with reporting requirements as outlined in Appendix 1 of the PSEAH Framework</p>
Collaborators	<p>Ensure internal policy and processes are compliant with the PSEAH Framework.</p> <p>Immediately report all concerns, suspicions, and incidents in accordance with reporting requirements as outlined in the PSEAH Policy and related PSEAH Reporting Procedure</p>

5. Procedures

5.1 Standards of Behaviour

The MCRI Code of Conduct sets standards of behaviour in relation to safety, respect, and integrity. All people are required to comply with the Code of Conduct, and the below standards of behaviour always when engaged by MCRI:

- All forms of SEAH are strictly prohibited by MCRI
- All concerns related to SEAH including suspected or alleged cases by anyone referenced in the scope of this Framework must be reported in line with the PSEAH Reporting Procedure as soon as practicable
- Transactional sex for all people is prohibited when engaged with MCRI activities
- Fraternisation for all non-national people while engaged in MCRI activities is prohibited
- All people are expected to ensure that these standards of behaviour are communicated with all stakeholders.
- All people are expected to communicate the availability of, and location of complaints mechanisms to all stakeholders.

• Actions

- MCRI agreements with collaborators include reference to the PSEAH Framework and MCRI Code of Conduct, including the PSEAH standards of behaviour outlined above.

• Accountability

- Legal

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| <ul style="list-style-type: none"> The MCRI Code of Conduct is readily available to all people including during onboarding and via compliance training every two years. | <ul style="list-style-type: none"> People and Culture |
| <ul style="list-style-type: none"> People record their commitment to the standards of behaviour outlined in the Code of Conduct during their online onboarding and bi-annually thereafter. | <ul style="list-style-type: none"> People Managers |

5.2 Recruitment and Screening

MCRI is committed to ensuring robust recruitment and selection processes that signal the organisation's commitment to safeguarding at all stages of engagement. All people undergo rigorous selection processes to identify suitable candidates and deter unsuitable candidates.

Actions	Accountability
<ul style="list-style-type: none"> Risk assessments are undertaken for all new roles to understand the potential SEAH risks and to ensure appropriate pre-employment checks, training requirements, and responsibilities are included in position descriptions. 	<ul style="list-style-type: none"> Hiring Manager People and Culture
<ul style="list-style-type: none"> In line with the requirements of the role, interview questions and reference checks incorporate PSEAH. 	<ul style="list-style-type: none"> Hiring Manager
<ul style="list-style-type: none"> Criminal record checks are undertaken for all employees and relevant contractors prior to onboarding in line with MCRI's Pre-Employment Screening Policy. 	<ul style="list-style-type: none"> People and Culture
<ul style="list-style-type: none"> The Institute requests that applicants disclose whether they have been charged with any SEAH offences. 	<ul style="list-style-type: none"> People and Culture

5.3 Ongoing Support and Education

MCRI is committed to providing all relevant people with PSEAH training to build a culture of respect, accountability, safety and integrity. Ongoing support and PSEAH capacity strengthening is undertaken through both formal and informal mechanisms such as trainings, team meetings, supervision and performance and development plans.

Actions	Accountability
<ul style="list-style-type: none"> Induction for MCRI people includes an overview of the PSEAH Framework, and opportunities to clarify the purpose and implementation of the Framework. 	<ul style="list-style-type: none"> Hiring Manager
<ul style="list-style-type: none"> All relevant MCRI representatives undertake PSEAH training every two-years. 	<ul style="list-style-type: none"> People and Culture
<ul style="list-style-type: none"> Work with partners and communities is conducted to ensure safeguarding training is appropriately adapted to the local context. 	<ul style="list-style-type: none"> MCRI Project Lead Child Safety Technical Advisor

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| <ul style="list-style-type: none"> Risk Management and Compliance, including PSEAH, is an agenda item at all project meetings | <ul style="list-style-type: none"> MCRI Project Lead Program Manager Global Health |
| <ul style="list-style-type: none"> PSEAH, is a standing agenda item at Melbourne Children's Global Health Leadership Team and Global Health Program Manager's Working Group meetings | <ul style="list-style-type: none"> Program Manager Global Health |
| <ul style="list-style-type: none"> Performance and Development include understanding and implementation of the PSEAH Framework, where appropriate to the responsibilities of the role. | <ul style="list-style-type: none"> People Leaders |

5.4 Risk Management

MCRI ensure that all project design and implementation incorporate an assessment of SEAH risks and of the SEAH vulnerabilities that may exist for the groups and populations with whom we have contact in low- and middle-income countries (LMICs). Implementing risk management processes that actively anticipate, respond to and prevent SEAH is paramount in all Global Health activities.

Monitoring and reviewing risks regularly (including after incidents, near misses and complaints) is vital to ensuring the ongoing learning and improvement. MCRI is committed to reviewing any systemic issues which may be contributing to or hindering the safety of our programs.

Actions	Accountability
<ul style="list-style-type: none"> Complete an initial SEAH risk assessment during project design, including with reference to the NHMRC National Statement on Ethical Conduct in Human Research 2023 (Chapter 4.3) 	<ul style="list-style-type: none"> MCRI Project Lead
<ul style="list-style-type: none"> Conduct a context analysis, identifying key legislation, authorities, support, and referral services in relation to PSEAH 	<ul style="list-style-type: none"> Child Safety and Child Rights Technical Advisor
<ul style="list-style-type: none"> Complete Group Risk Register Control or treat SEAH risk in line with Risk Register Monitor and review risk management plans regularly (including after incidents, near misses and complaints) Escalate SEAH risks to Program Manager's Working Group, Global Health Leadership Team or Head of People and Culture, in line with Risk Management Framework Reporting Structure 	<ul style="list-style-type: none"> Group Leader and/or MCRI Project Lead
<ul style="list-style-type: none"> Review Global Health Strategic Initiative Risk Register, monthly Control or treat SEAH risk in line with Risk Register Escalate SEAH risk to Global Health Leadership Team or Head, and People and Culture in line with Global Health Risk Management Framework Reporting Structure 	<ul style="list-style-type: none"> Program Managers Working Group

<ul style="list-style-type: none"> Review high or extreme risks Global Health Strategic Initiative Risk Register, monthly Control or treat SEAH risk in line with Risk Register Escalate SEAH risk to Head of People and Culture, MCRI in line with Global Health Risk Management Framework Reporting Structure 	<ul style="list-style-type: none"> Global Health Leadership Team
<ul style="list-style-type: none"> Monitor and review organisational SEAH risk Report risk data to Board Control or treat SEAH risk in line with Risk Register 	<ul style="list-style-type: none"> Chief Operating Officer
<ul style="list-style-type: none"> Ensure SEAH risk is considered in high-risk travel risk assessments 	<ul style="list-style-type: none"> Head, Environment, Health and Safety
<ul style="list-style-type: none"> Ensure SEAH risk is included and reviewed in organisational risk register 	<ul style="list-style-type: none"> Director, Risk and Compliance

5.5 Global Health: Working with Collaborators

MCRI requires collaborators to ensure they uphold the standards and commitments of the PSEAH Framework and adhere to any contractual requirements. In assessing and ensuring collaborators manage their PSEAH obligations in line with requirements, MCRI embeds the following procedure:



MCRI requires collaborators to have PSEAH Policies and Procedures (or equivalent) in place that meet the standard of this Framework, and donor requirements. Where collaborators do not have PSEAH documents in place, this Framework may be adopted and adhered to as part of the contracting process. MCRI works with collaborators to ensure the standards laid out in this Framework and related Reporting Procedure are met. MCRI will do so through ongoing capacity strengthening, training and consultation.

Actions	Accountability
<ul style="list-style-type: none"> MCRI Global Health Initiative Collaboration Framework and Assessment is completed for all collaborators for projects operating in low- and middle-income countries to assess PSEAH capacity and 	<ul style="list-style-type: none"> MCRI Project Lead

ensure program design supports building capacity in budgets, training provision and communication plans.	<ul style="list-style-type: none"> Child Safety and Child Rights Technical Advisor
<ul style="list-style-type: none"> Confirm context analyses are up to date in relation to PSEAH requirements, and services OR conduct context analyses. 	<ul style="list-style-type: none"> MCRI Project Lead
<ul style="list-style-type: none"> The context analysis identifies legislative requirements, authorities, support, and referral pathways in-country. 	<ul style="list-style-type: none"> Child Safety & Child Rights Technical Advisor
<ul style="list-style-type: none"> Agreements with collaborators clearly outline procedures for reporting and investigating SEAH concerns involving breaches of the Framework. This extends to ensuring collaborators understand their requirement to report breaches to MCRI. 	<ul style="list-style-type: none"> Legal
<ul style="list-style-type: none"> Involve collaborators and stakeholders to identify project specific SEAH risk factors 	<ul style="list-style-type: none"> MCRI Project Lead
<ul style="list-style-type: none"> Reviews and spot checks are undertaken in line with collaborator risk and compliance level, and capacity needs. 	<ul style="list-style-type: none"> Child Safety and Child Rights Technical Advisor
<ul style="list-style-type: none"> Work with collaborators to strengthen internal capacity, policy and procedure, in line with the Collaboration Framework 	<ul style="list-style-type: none"> Global Health Program Manager
<ul style="list-style-type: none"> All agreements include PSEAH contractual requirements, including compliance with this Framework, donor requirements, reporting requirements and compliance with the PSEAH standards of behaviour. 	<ul style="list-style-type: none"> Legal

5.6 Engagement and Participation

MCRI is committed to sharing key information about our approach safeguarding with participants and the community. This includes sharing information on the responsibilities, rights, and requirements of people, and ensuring participants and community members are aware of culturally safe and confidential complaints mechanisms.

Actions	Accountability
<ul style="list-style-type: none"> Clear standards of behaviour for people are included on information provided to participants and families during the consent process. 	<ul style="list-style-type: none"> MCRI Project Lead
<ul style="list-style-type: none"> Feedback and complaints mechanisms are contextualised to ensure mechanisms are accessible, confidential, culturally safe, child-friendly, available in language and formats that will be easy to understand for participants and communities. 	<ul style="list-style-type: none"> MCRI Project Lead

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| <ul style="list-style-type: none"> The standards of behaviour expected by people and feedback and complaints mechanisms are communicated to participants and communities. Where possible, community engagement informs complaints mechanisms and the communication of the Framework's key messages/ | <ul style="list-style-type: none"> MCRI Project Lead |
| <ul style="list-style-type: none"> Where possible physical environments include references to safeguarding, appropriate standards of behaviour for people and feedback and complaints mechanisms. | <ul style="list-style-type: none"> MCRI Project Lead |

5.7 PSEAH Complaints and Reporting

All people are required to report suspected or actual SEAH incidents, or Framework breaches using the PSEAH Reporting Procedure, including:

- Disclosures or complaints of harm by research participants, families, and community members
- Breaches of this Framework, and/or MCRI Code of Conduct
- Concerns, allegations, suspicions, or observations of inappropriate behaviour by people
- Any additional information relating to an incident that has already been reported.

MCRI will ensure that accessible reporting procedures are made available to all stakeholders in contexts where activities are operating.

MCRI People and Collaborators who have information pertaining to an incident, disclosure, concern, allegation, or complaint always maintain confidentiality. Information pertaining to an incident or investigation will only be made available to authorised persons, on a need-to-know-basis. Anonymous complaints are accepted and responded to the fullest extent possible.

Procedural Fairness is a fundamental principle of all aspects of MCRI reporting and investigation procedures.

MCRI is committed to communicating key aspects of the framework including standards of behaviour and reporting mechanisms appropriate to age, language, and capacity.

MCRI takes reporting requirements from funding partners and collaborators seriously and ensures that reporting occurs within designated timeframes.

Actions	Accountability
<ul style="list-style-type: none"> Ensure accessible complaints mechanisms are implemented and communicated within activity contexts in line with the MCRI Complaints Handling Procedure. 	<ul style="list-style-type: none"> MCRI Project Lead
<ul style="list-style-type: none"> Communicate MCRI's SEAH reporting requirements to all people working across relevant activities. 	<ul style="list-style-type: none"> Global Health Program Manager
<ul style="list-style-type: none"> Ensure local legislation, referral, and support services to support victim/survivors are made available to MCRI people and collaborators. 	<ul style="list-style-type: none"> MCRI Project Lead
<ul style="list-style-type: none"> Report all concerns, disclosures, complaints, allegations, and incidents of SEAH along internal reporting lines identified in the PSEAH Reporting Procedure 	<ul style="list-style-type: none"> All project and MCRI people

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| <ul style="list-style-type: none"> • Ensure all external reporting requirements, including law enforcement and donor reporting, are undertaken for SEAH incidents | <ul style="list-style-type: none"> • Head of People and Culture, MCRI |
| <ul style="list-style-type: none"> • Managing investigations into SEAH incidents related to MCRI employees. | <ul style="list-style-type: none"> • Head of People and Culture, MCRI |
| <ul style="list-style-type: none"> • Managing reports to the Board, including escalating significant incidents and, providing general reporting data (de-identified) | <ul style="list-style-type: none"> • Head of People and Culture, MCRI |

The full Reporting Procedure is included in [Appendix 2 of this Framework](#).

6. Dispute Resolution and Breaches

All MCRI people and collaborators are required to report breaches of this Framework, in line with *the PSEAH Reporting Procedure*. Where a breach is identified, MCRI will respond without delay.

People who breach this policy may face disciplinary action, up to and including termination of engagement with MCRI, civil and criminal proceedings.

7. Enquiries

This Policy is available on our website and intranet. For further information please contact the People and Culture team on peopleandculture@mcri.edu.au or the Global Health team on global.health@mcri.edu.au.

8. Compliance with the PSEAH Framework

MCRI requires all MCRI people and collaborators to adhere to this Framework. To ensure people can do so, MCRI implements the following practices:

- Training on identifying and reporting SEAH is provided to all relevant MCRI people
- Training can be provided to partner organisations in line with their capacity requirements
- Key meeting agendas include space for discussion, clarifications and questions on the implementation of this Framework and PSEAH more broadly.

If the institute has a reason to believe that a person subject to the Framework has failed to comply with it, the institute will investigate the circumstances. If it is found that this person has failed to follow the policy, the institute will consider the circumstances, legal implications, Code of Conduct and may take action against them. This may include seeking to terminate their relationship with the institute.

9. Supporting Documents, Procedures, Guidelines and Definitions

- Code of Conduct
- Sexual Discrimination, Sexual and Sex-based Harassment Policy
- Child Safety Policy
- Child Safety Procedure
- Complaints Management Policy and Procedure
- Whistleblower Policy
- Privacy Policy
- Pre-employment Screening Policy
- Recruitment Policy and Procedure

- Induction and Compliance Training Policy

10. Related Legislation and Industry Codes

- Department of Foreign Affairs and Trade (DFAT) [Preventing Sexual Exploitation, Abuse and Harassment \(PSEAH\) Policy](#)
- Australian Council for International Development (ACFID) [Code of Conduct](#)
- [UNICEF General Terms and Conditions for Institutional/Corporate Contracts](#)
- [World Health Organization \(WHO\) Policy on Preventing and Addressing Sexual Misconduct](#)

Appendix 1: Framework Definitions

Term	Definition
Activity	Refers to any MCRI work conducted across contexts where this Framework applies, including research, projects, programs, conferences and meetings.
Adult	A person aged 18 years or more.
Child	A person under the age of 18 years.
Complaint	Complaint should be interpreted broadly and can include expressions of dissatisfaction relating to: Dealings with an individual; Allegations about the conduct of staff, volunteers, or other individuals engaged by MCRI or another child or young person participating in MCRI research; or The handling of a prior concern.
Collaborator	Refers to entities that MCRI partners with on research and/or programs.
Disclosure	The process by which a person begins to share their experience of abuse, harassment or exploitation.
Fraternisation	Refers to any relationship that involves, or appears to involve, partiality, preferential treatment or improper use of rank or position including but not limited to voluntary sexual behaviour. It could include sexual behaviour not amounting to intercourse, a close and emotional relationship involving public displays of affection or private intimacy and the public expression of intimate relations.
People	Refers to all MCRI salaried and non-salaried people, volunteers, contractors, sub-contractors, students, honorary and affiliate appointment.
MCRI Project Lead	Refers to the MCRI employee leading a research project, or program.
PSEAH	The term used to refer to the actions taken by MCRI to prevent and protect people from sexual exploitation, abuse and harassment.
Reporter(s)	Individual or individuals who have reported a SEAH concern.

Risk	<p>The effect of uncertainty on objectives, where an effect is the deviation from what is expected (consistent with <i>AS/NZS ISO31000:2009</i>).</p> <p>In other words, risk is the potential for either a positive or negative deviation from the objective(s) expected to be achieved. Risk is often expressed in terms of an event's consequences and the likelihood of its occurrence. Risk is inevitable and needs to be managed.</p>
Risk Assessment	<p>The process used to determine the likelihood that people may be exposed to injury, illness or disease in the workplace arising from any situation identified during the hazard identification process</p>
Risk Management	<p>Coordinated activities to direct and control an organisation with regard to risk. (consistent with <i>AS/NZS ISO31000:2009</i>)</p> <p>Risk management should occur in a systematic, transparent and disciplined way that will contribute to MCRI's success in delivering its stated purpose. Risk management encompasses all organisational objectives and should address all uncertainties, both negative (threats) and positive (opportunities). It should provide a framework for addressing risk in methodical, consistent ways, creating an environment where informed decisions regarding risk can be made openly, transparently and with the confidence that uncertainty can be reduced</p>
Safeguarding	<p>Safeguarding refers to the proactive implementation of policies, procedures, and systems to support a 'do no harm' approach to the work of MCRI. It involves ensuring our people, environments and activities reduce and/or remove the opportunities for participants, and community members to be harmed, abused, or exploited while engaged, or due to their engagement with MCRI and its partners.</p>
SEAH	<p>Sexual exploitation, abuse and harassment.</p>
Sexual Abuse	<p>Refers to the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. It covers sexual offences including but not limited to:</p> <p>attempted rape (which includes attempts to force someone to perform oral sex); and sexual assault (which includes non-consensual kissing and touching).</p> <p>All sexual activity with someone under the age of consent² is considered to be sexual abuse.</p>
Sexual Exploitation	<p>Refers to any actual or attempted abuse of a position of vulnerability, differential power, or trust for sexual purposes. It includes profiting monetarily, socially, or politically from sexual exploitation of another.</p>
Sexual Harassment	<p>A person sexually harasses another person if the person makes an unwelcome sexual advance or an unwelcome request for sexual favours, or engages in other unwelcome conduct of a sexual nature, in circumstances in which a reasonable person, having regard to all the circumstances, would have anticipated the possibility that the person harassed would be offended, humiliated or intimidated. Sexual harassment can take various forms. It can be obvious or indirect, physical or verbal, repeated or one-off and perpetrated by any person of any gender towards any person of any gender. Sexual harassment can be perpetrated against beneficiaries, community members, citizens, as well as staff and people. Some examples of behaviour that may be sexual harassment include:</p> <ul style="list-style-type: none"> • staring or leering;

² Refers to age of consent requirements specified for sexual activity in the law of the host country or the age of consent under the law of the Australian Capital Territory (16 years), whichever sets the greatest age.

- unnecessary familiarity, such as unwelcome affection or touching;
- suggestive comments or jokes;
- insults or taunts of a sexual nature;
- intrusive questions or statements about your private life;
- displaying posters magazines or screen savers of a sexual nature;
- sending sexually explicit emails or text messages;
- inappropriate advances on social networking sites;
- accessing sexually explicit internet sites;
- requests for sex or repeated unwanted requests to go out on dates; and
- behaviour that may also be considered to be an offence under criminal law such as physical assault, indecent exposure, sexual assault , stalking or obscene communications.

Transactional Sex Refers to the exchange of money, employment, goods or services for sex, including sexual favours.

Victim/Survivor A person who is being or has been sexually exploited, abuse or harassed.

Vulnerability Refers to the social and health inequities that exist across any number of contexts and create circumstances, that, due to a range of factors, is determined to be at greater risk of exploitation, abuse and harrassment.

The term vulnerability is not meant to infer any individual or collective weakness, rather, it acknowledges the social, and health inequalities that exist and impact micro and macro power imbalances.

Whistleblower Any person internal or external to MCRI who makes a disclosure of alleged improper conduct or detrimental action by MCRI or an employee or board member under the Whistleblowers Protection Act 2001

Appendix 2: MCRI Global Health Strategic Initiative PSEAH Reporting Procedure

What needs to be reported?

All disclosures, concerns, suspicions, complaints, allegations and incidents of sexual exploitation, abuse, and harassment:

- Sexual exploitation perpetrated by any people connected with MCRI
- Sexual abuse, perpetrated by any people connected with MCRI
- Sexual harassment, perpetrated by any connected with MCRI
- Breaches (suspected or actual) to the PSEAH Framework, Code of Conduct, Child Safety Policy and Procedure.

All breaches must be reported, regardless of perceived impact and/or level of breach. Information on breaches to this Framework support the review and continuous improvement of policy, activities and the safety of all participants, and people engaged in those activities.

Please note: For victims/survivors of sexual harassment who are engaged by MCRI as salaried and non-salaried people, the Sex Discrimination, Sexual and Sex-based Harassment Policy functions as the central policy managing complaints of all forms of sexual harassment, abuse and victimisation.

Who can report?	Who must report?
<p>Any person can report via MCRI reporting channels, including:</p> <ul style="list-style-type: none"> • Research or program participants • Parents, carers, support persons, friends of research or program participants • Community members 	<p>All MCRI people**</p> <p>All MCRI people who are aware of concern of SEAH related to MCRI activities</p> <p>**The requirement to report under this Procedure does not extend to people who have experienced SEAH.</p>

Feedback, Complaints and Reporting Pathways for Participants and the Community

Research participants, families and community members			
Mechanism	How to report	Key contacts	Accountability
In-person	<p>Project participants, family members and community members can make a complaint to MCRI people or partners in-person. Complaints may be communicated verbally or through other means of communication.</p> <p>Information about Feedback and Complaints should be supplied to all participants and displayed around physical sites in a variety of accessible formats.</p>	All people	MCRI Project Lead
By Telephone	<p>All project participants and family members are provided with Participant Information and Consent Forms and/or other information that includes a local accessible contact and an independent complaints telephone number.</p> <p>The MCRI complaints phone number is displayed on physical sites (where possible) and on the MCRI website.</p> <p>Research participants may make a complaint via the Royal Children's Hospital Ethics Committee (RCH) or their Local Research Ethics Committee.</p> <p>Complainants can choose to omit their name and identifying details and submit an anonymous complaint.</p>	<p>MCRI Project Leads</p> <p>Head of People and Culture, MCRI</p>	<p>MCRI Project Lead</p> <p>Head of Communications (website)</p>
In writing	<p>All project participants and family members are provided with Participant Information and Consent Forms and/or other information with email contact details.</p> <p>Where possible, physical sites include complaints forms, and information about how written complaints can be made.</p> <p>Complainants can choose to omit their name and identifying details and submit an anonymous complaint.</p>	<p>MCRI Project Leads</p> <p>Head of People and Culture, MCRI</p>	Chief Operating Officer

Confidential complaints can be made via:

feedback@mcri.edu.au

Whistleblowing

Reports can be made in line with the [Whistleblower Policy](#) via the Whistle Blowing Service

<https://www.whistleblowingservice.com.au/mcri/>

The website includes information about making a phone report via the Whistleblower service: 1300 687 927. The phone service runs 24/7 and is Australia based.

Feedback, Complaints and Reporting Pathways for MCRI People

Mechanism	How to report	Key Contacts	Timeframe	Accountability
In-person	MCRI and partner people can make a report in-person to the MCRI Project Lead, Theme Director, or Head of People and Culture.	MCRI Project Lead, Theme Director or Head of People and Culture, MCRI	Immediate (as soon as practicable)	All people
By Telephone	All people and partners can make a report by telephone to the MCRI Project Lead, Theme Director or Head of People and Culture.	MCRI Project Lead, Theme Director or Head of People and Culture, MCRI	Immediate (as soon as practicable)	All people
In writing	All people and partners can make a report via email to the MCRI Project Lead, Theme Director or Head of People and Culture, MCRI. The Safeguarding Reporting Form can be found here . Reports can be made in line with the Whistleblower Policy via the Whistle Blowing Service https://www.whistleblowingservice.com.au/mcri/ The website includes information about making a phone report via the Whistleblower service: 1300 687 927. The phone service runs 24/7 and is Australia based.		Immediate (as soon as practicable)	All people

Reporting SEAH Concerns, Allegations, Complaints and Disclosures

Internal Reporting

Actions	Timeframe	Accountability
<p>MCRI Project Lead</p> <p>MCRI Project Leads are identified as the first point of contact for all people and/or collaborators reporting a concern, allegation, disclosure, incident, or complaint of SEAH.</p> <p>Theme Director</p> <p>Where the Project Lead is not available and/or are the subject of the report/complaint, reports should be made directly to the Theme Director or Head of People and Culture, MCRI.</p> <p>Head of People and Culture, MCRI</p> <p>All reports are escalated to the Head of People and Culture, MCRI. MCRI People can contact the Head of People and Culture, MCRI directly and/or alongside their PI/Theme Director.</p> <p><i>All reporting focal points must have a nominated delegate in place when on leave and/or unavailable for extended periods of time.</i></p> <p><i>Serious SEAH Incidents are escalated to Board level by the Head of People and Culture, MCRI.</i></p>	<p>Immediately (as soon as practicable).</p>	<p>All people / collaborators</p>

Assessment and Support

Actions	Timeframe	Accountability
<p>If the victim/survivor, reporter, or another person is at immediate risk of harm, contact emergency services.</p> <p>If the victim/survivor is a child, reporting to authorities will be required (excepting scenarios where reporting is unsafe or may place the child at further risk of harm). All instances of SEAH involving children must be managed using the Child Safety Reporting Procedure.</p> <p>Support the victim/survivor to access any immediate medical attention needed.</p>	<p>Immediately</p>	<p>Employee who identified the concern/received the disclosure.</p>
<p>During project design, contexts are analysed to ensure a clear understanding of support services that may be referred to and made available/accessible to victim/survivors.</p> <p>Referrals should be documented on the Safeguarding Incident Complaint and Reporting Form, alongside any updated ongoing actions, including providing access to social, financial, and legal assistance or referrals to services.</p>	<p>In line with wishes of the victim / survivor</p>	<p>MCRI Project Lead / Theme Director / Head of People and Culture, MCRI</p>

External Reporting (Law Enforcement)

Actions	Timeframe	Accountability
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Where safe to do, and in accordance with the wishes of the victim/survivor, all cases of SEAH that involve a breach of legislation or criminality, are reported through to law enforcement authorities.

As soon as practicable

MCRI Project Lead

Local Authorities

During project design, contexts are analysed to ensure a clear understanding of local legislation, referral services and reporting authorities. This information is made available and accessible to all people, and stakeholders.

Country or project reporting procedures are made available to all in-country and people engaged on activities being undertaken in-country, external reporting requirements and individual reporting responsibilities.

Australian Authorities

Where appropriate, referrals are made to the Australian Federal Police.

As soon as practicable

Head of People and Culture, MCRI

External Reporting (Donor Reporting)

Due to contractual funding requirements, MCRI ensures that all reports are made in line with specified timeframes to donors. People and Culture report to Donors, in consultation with the Philanthropy team.

Donor	What to report	How to report	Timeframe	Accountability
DFAT	Alleged incidents of sexual exploitation, abuse or harassment involving DFAT, MCRI and partner organisation people related to the delivery of DFAT business. This includes any alleged incident that poses a significant reputational risk to DFAT.	All reports of alleged SEAH incidents should be made using the DFAT Sexual Exploitation, Abuse and Harassment Incident Notification Form (www.dfat.gov.au/pseah) and emailed to seah.reports@dfat.gov.au	Immediately (within 2 working days of becoming aware of an alleged incident)	Head of People and Culture, MCRI
	DFAT, MCRI and partner organisation employee alleged Policy non-compliance.		Mandatory reporting (within five working days)	Head of People and Culture, MCRI
UNICEF	Any incident or report of sexual exploitation or abuse involving People, including people or other persons engaged by MCRI to perform any services under the Contract. Sexual exploitation and abuse include exchanging any money, goods, services, or other things of value, for sexual favours or activities or from engaging in any sexual activities that are exploitive or degrading to any person.	NA	As soon as MCRI becomes aware of any incident or report	Head of People and Culture, MCRI

World Health Organization	Collaborators have a duty and obligation to report concerns or suspicions and incidents of sexual misconduct and to respect and maintain the confidentiality of the process.	WHO's Office of Internal Oversight Services (investigation@who.int) or through the WHO Integrity Hotline: https://www.who.int/about/ethics/integrity-hotline	Promptly	Head of People and Culture, MCRI
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Recording

Actions	Timeframe	Accountability
<p>Keep comprehensive notes that are dated and include the following information:</p> <ul style="list-style-type: none"> Information that has led to concerns (e.g. observations, disclosure) The Safeguarding Incident Reporting Form provides a guide for recipients on what information to record, and must be completed for all incidents, concerns, allegations, complaints, and disclosures. The source of the report (e.g., observation of behaviour, disclosure from victim/survivor or report from another person). Actions taken as a result of the concerns (internal reporting undertaken / management of immediate risks) <p>If a disclosure is being made by a victim/survivor or another person, where possible, notes should be taken.</p> <p>If it is not possible to take notes during a disclosure or complaint, the Safeguarding Incident Complaint and Reporting Form should be completed as soon as practicable. (NB: if the form is not accessible or available, notes of the complaint/report must be taken as soon as practicable).</p>	Concurrent with other steps / as soon as practicable	Person who identified the concern/received the disclosure and reporting contact

Investigations

Actions	Timeframe	Accountability
<p><u>Decision to Investigate</u></p> <ul style="list-style-type: none"> People and Culture will determine whether it is appropriate and/or safe to investigate any allegations via a thorough and documented risk assessment. Internal investigations will not interfere with reporting to authorities. Where reports to authorities have been made, internal investigations will obtain consent from law enforcement bodies prior to conducting an internal investigation. <p>Informed consent is given by the victim/survivor and/or guardian for an investigation to proceed. Where a victim/survivor does not consent (or withdraws consent), this must be factored into a risk assessment to</p>	As soon as practicable following receipt of a report / complaint	Head of People and Culture, MCRI

ensure their best interests and safety are not compromised by the investigation.

People and Culture will determine the scope of the investigation.

People and Culture will determine what actions should be taken in relation to the Subject of the Allegation (SOA) during the investigation.

People and Culture will engage an appropriately qualified investigator (either internally or externally).

Planning and Investigating

Develop an investigation plan, including identification of relevant parties to be interviewed and the evidence to obtain.

Obtain accounts from the victim/survivor, interview witnesses and gather relevant documentary, audio and visual evidence.

Draft allegations, if identified, and provide the SOA with an allegation letter prior to their interview.

Interview the SOA.

Draft a report making findings on the allegations based upon the evidence obtained.

Prior to approving the investigations report, the Head of People and Culture, MCRI (or otherwise nominated Investigation Manager), conducts a quality review of the report.

As soon as practicable

Head of People and Culture, MCRI

Findings and Reporting

Comply with reporting requirements to donors.

Notify the SOA of the findings and proposed outcome.

Notify the victim/survivor of the findings.

Securely store all the evidence in relation to the investigation.

As soon as practicable

Head of People and Culture, MCRI

Continuous Improvement

Actions

Following incidents, and investigations into SEAH, risk management processes, frameworks and registers, and plans will be reviewed to identify any opportunities for improvement, including gaps in documentation and practical implementation.

Investigation reports may make recommendations into policy, procedure, communication, complaints mechanisms and complaints management procedures to be implemented.

Accountability

Head of People and Culture, MCRI

Head of People and Culture, MCRI