

Policy Owner:	Head of People & Culture	Policy Year & Version:	2025 – Version 2
Executive Policy Sponsor:	Chief Operating Officer	Date Approved:	14 March 2025
Approval Authority:	MCRI Board of Directors	Next Review Date:	14 March 2028

1. Overview and Purpose

- 1.1. The Institute conducts research to improve the health outcomes of children and young people. In doing so, we ensure safe environments for the communities we engage with.
- 1.2. This document sets out the Prevention of Sexual Exploitation, Abuse and Harassment (**PSEAH**) Policy developed by Murdoch Children's Research Institute (ABN 21 006 566 972) (referred to as **MCRI**) and Victorian Clinical Genetics Services (ABN 51 007 032 760) (referred to as **VCGS**) collectively referred to as the **Organisation**. Words defined in this Policy have the meaning given in this document including in the Definitions section 7.
- 1.3. The PSEAH Policy sets out our commitment to:
 - a) prevent sexual exploitation, abuse and harassment; and
 - b) protect all research and project participants, their families and the wider communities in which we work from sexual exploitation, abuse and harassment.

2. Scope of Application

- 2.1. This Policy applies to all Staff of the Organisation including:
 - both salaried and non-salaried employees of the Organisation;
 - all other staff of the Organisation including volunteers, students, honorary and affiliate appointments.
- 2.2. This Policy has been developed to support the safeguarding of adults. Our Child Safety Policy covers our approach to safeguarding children.
- 2.3. In some circumstances, this Policy applies to third-party collaborators, partners and Suppliers (including Contractors). Individuals will be notified when the Policy applies to their engagement.

3. Policy Principles

- 3.1. **Zero tolerance.** We will investigate and respond to reports of sexual exploitation, abuse and harassment (**SEAH**).
- 3.2. **Victim/Survivor-centred approach.** This means that:
 - concerns can be raised safely without fear of retaliation or unfair treatment;
 - concerns are handled confidentially, and we respect the rights and wishes of victim/survivors; and
 - we provide information and involve victim/survivors in decision-making throughout the response process.
- 3.3. **Leadership and a strong safeguarding culture.** Our leaders set and uphold clear behavioural expectations for our people and partners. We train and ensure everyone understands their responsibilities for preventing SEAH.

Prevention of Sexual Exploitation, Abuse & Harassment Policy

- 3.4. **Communicating our standards.** We ensure research and program participants understand the standards set for our people.
- 3.5. **Addressing power imbalances.** We identify power imbalances and implement strategies to prevent power abuses.
- 3.6. **Risk management.** We prevent SEAH through regular risk assessment, monitoring and mitigation processes.
- 3.7. **Safeguarding is a shared responsibility.** Everyone is expected to comply with:
- this Policy;
 - our Code of Conduct; and
 - the standards of behaviours set out in the PSEAH Procedure.
- 3.8. **Partner understanding.** We require our partners to comply with the standards set out in this Policy. We ensure we understand our partners' PSEAH capacity throughout our working relationship.
- 3.9. **Continuous improvement.** We encourage feedback to drive continual improvement, with input welcomed from all stakeholders.
- 3.10. **Reporting.** All SEAH concerns must be reported. We consider a failure to report to be a serious breach of our PSEAH policy.

4. Key Accountabilities

Role	Responsibility
Audit, Finance and Risk Committee	<ul style="list-style-type: none"> • Endorsement of the PSEAH Policy • Monitoring of the implementation of the PSEAH Policy through organisational risk reporting
Executive	<ul style="list-style-type: none"> • Promote commitment to the Policy and Procedure • Monitoring the implementation of the PSEAH Policy and Procedure including barriers to implementation. • Communicate regarding the importance and expectations of PSEAH strategies
MCRI Project Leads and People Managers	<ul style="list-style-type: none"> • Ensuring all people are aware of their PSEAH roles and responsibilities • Ensuring all people receive appropriate PSEAH training • Ensuring projects implement and comply with PSEAH requirements in line with this Policy • Support stakeholders and team members involved in SEAH concerns.
People & Culture	<ul style="list-style-type: none"> • Conduct all relevant pre-employment checks or equivalent • Support robust recruitment and screening processes focused on safeguarding across the Institute • Support the investigation of breaches and incidents as required
All people	<ul style="list-style-type: none"> • Comply with the PSEAH Policy at all times • Immediately report all SEAH concerns and incidents in accordance the PSEAH Procedure • Complete all required PSEAH training • Identify, control, monitor and treat SEAH risks in line with this Policy • Obtain appropriate informed consent for children and young people's participation, including consent for using their images and videos • Behave in line with the Institute's Code of Conduct and the PSEAH Procedure's Standards of Behaviour • Ask their people leader if they are unclear about anything related to this Policy; and • Immediately report any breaches this Policy or PSEAH incidents, allegations or disclosures.

Prevention of Sexual Exploitation, Abuse & Harassment Policy

5. Enquiries

- 5.1. This Policy is available on the Institute's website and intranet. For further information please contact the People and Culture team on: peopleandculture@mcri.edu.au

6. Compliance with the Policy

- 6.1. SEAH reports will be managed in line with the PSEAH Procedure. If a person is deemed to have breached this Policy, action will be taken in line with the Procedure.
- 6.2. If the Organisation has a reason to believe that a person subject to the policy has failed to comply with it, the Organisation will investigate the circumstances. If it is found that this person has failed to follow the policy, the Organisation will consider the circumstances, legal implications, the Code of Conduct and may take disciplinary action against them. This may include seeking to terminate their relationship with the Institute.
- 6.3. Non-reporting will be viewed as a serious breach of this Policy which may lead to disciplinary action up to and including termination of engagement with the Institute. Agreements include clauses regarding the reporting on and implications of non-compliance with this Policy. Procedural fairness is an essential part of the Institute's reporting, response, and investigations processes.

7. Definitions

- 7.1. SEAH refers to sexual exploitation, abuse and harassment. For the purposes of this policy, SEAH definitions are:
- 7.2. Sexual abuse refers to the actual, attempted or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.
- 7.3. Sexual exploitation 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.
- 7.4. Sexual harassment: A person sexually harasses another person where they:
 - make an unwelcome sexual advance or an unwelcome request for sexual favours, or
 - engage 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 participants, community members, citizens, as well as team members and other representatives of the Institute.

8. Supporting information, related documents

Key Policies and Procedures that are supported by this PSEAH Policy are identified below:

- **Prevention of Sexual Exploitation, Abuse and Harassment (PSEAH) Procedure**

Prevention of Sexual Exploitation, Abuse & Harassment Policy

- **Sexual Discrimination, Sexual and Sex-Based Harassment Policy:** The purpose of the PSEAH Policy is to outline the commitment to the safety of all people, participants, families and community members engaged with the Institute. Sexual discrimination and harassment of Institute staff is managed under the Sexual Discrimination, Sexual and Sex-Based Harassment Policy and managed 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:** The PSEAH Policy forms key components of the Institute’s approach to safeguarding and should be read in conjunction with the Institute’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:** The Institute’s Code of Conduct prohibits all forms of sexual exploitation, abuse, and harassment.

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

- **World Health Organization (WHO):** The Institute is in official and formal relations with the World Health Organization, including operating WHO Collaborating Centres, and Institute people act as technical advisors to the World Health Organization, including through Agreed Performance of Work (APWs). This Policy and its procedure ensure compliance with the WHO Policy on Preventing and Addressing Sexual Misconduct.
- **Australian Council for International Development (ACFID):** The Institute 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):** The Institute is an Australian Government 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. This Policy 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.

Version History

Version	Approved by	Approval date	Effective date	Changes (if relevant)
1.0	Chief Operating Officer	July 2024	July 2024	PSEAH Framework divided into the PSEAH Policy and a related Procedure.
2.0	MCRI Board of Directors	14 March 2025	14 March 2025	Conversion from Framework to Policy
