PREVENTION OF SEXUAL EXPLOITATION, ABUSE and Harassment (PSEAH) POLICY

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1. PURPOSE

Mercy Ships Australis (MSA) recognises that Sexual Exploitation and Abuse (SEA) is a violation of basic human rights and takes a zero-tolerance approach. This policy articulates MSA's commitment to provide a safe and trusted workplace that safeguards staff, interns, volunteers, contractors, partners, communities, participants in MSA activities, children, and vulnerable adults from SEA. This policy seeks to ensure that those affected by SEA have the confidence to report incidents with the knowledge that any concerns will be handled swiftly and sensitively under a survivor- centred approach in preventing and responding to SEA.

Sexual exploitation, sexual abuse, and sexual harassment are never acceptable. Zero tolerance is not the same as zero incidents. Reports of incidents may increase as we improve our safeguards. Which may indicate that there is a growing awareness of SEA and changing attitudes. MSA- Australia seeks to ensure that its policies empower survivors to feel more comfortable in reporting incidents. The reporting of incidents and responses are an indicator that the risk of SEA is being managed appropriately.

2. POLICY

- 1. The following list of expected behaviours applies to all respondents to this Policy:
 - At all times, to act in a manner that upholds the good reputation of MSA-Australia.
 - Undertake to create and maintain a safe and trusted environment that promotes the implementation of this Policy and safeguards everyone from SEA.
 - Comply with all relevant laws pertaining to the country within which MSA's work is conducted, including during work related travel.
 - Be aware that sexual behaviour is an area of sensitivity, where conduct may more easily be seen as offensive or be misinterpreted, particularly with respect to different cultural norms.
 - Ensure personal conduct with others occasioned in the conduct of MSA work, is not exploitative or such that it reasonably leads to a perception of exploitation.
 - Immediately report any concerns, suspicions or allegations of SEA or a breach of this Policy to the CEO, People & Culture Director (who is the PSEA & Child Protection Focal Point), any Board member or member of the Executive Team, and encourage and support others to do so.
 - People with concerns, suspicions or allegations also have access to the MSA's Intranet or can email concerns to <u>confidential@mercyships.org.au</u> or call our whistleblower hotline Mercy Ships Compliance Message Centre: +1 903 939 7011 (ISC extension 7011) or Mercy Ships Australia office 1300 739 899
 - Use a position of trust and authority to request any service or sexual favour from beneficiaries of MSA activities including, adults, children, or others in the communities in which MSA works, in return for protection or assistance, or coerce a person to engage in sexual intercourse or any sexual activity.

- Exchange or withhold funding, assistance, or other activity benefits from beneficiaries of MSA activities including adults, children, or others in the communities in which MSA works. These must never be traded for services for sex or sexual favours or other forms of humiliating, degrading or exploitative behaviour.
- Use MSA or partner organisation facilities, staff, or resources for the purpose of arranging or facilitating access to sex workers by any person, including visitors to MSA offices or activities.
- Engage in sexual activity with a child or vulnerable adult under any circumstance. This includes in any country where the age of majority or the age of consent is lower than 18 years. Respondents to this Policy are forbidden to have sexual activity with anyone under the age of 18 years. A mistaken belief that the child is over 18 is not a defence.
- Use computers, mobile phones, video cameras, cameras, or other technology (including drones) inappropriately, or to exploit or harass children, adults and vulnerable adults, or access or disseminate exploitative material through any medium or channel.
- Procure sex for others or use a third party to do so.
- Have sex with sex workers when working or volunteering overseas, even when it is legal in the country.
- 2. Breach of Policy

Sexual exploitation and abuse by respondents to the Policy constitute acts of gross misconduct and are grounds for termination of the employment, contractor or volunteer assignment, or activity assignment. Disciplinary actions and possible outcomes for a breach of the Policy will depend on the contractual arrangement and may include:

- Referral to local law enforcement authorities (as per national and any mandatory reporting laws), where appropriate
- Referral to Australian Federal Police, where appropriate
- MSA internal investigation
- Suspension pending investigation
- Performance management
- Formal warning and monitoring
- Termination of employment or assignment

3. SOURCES OF AUTHORITY

All respondents to the Policy are subject to Federal and relevant State legislation relating to sexual exploitation and abuse. Local country laws may apply but are not listed.

Federal Legislation

- ACFID Code of Conduct 2017
- DFAT Child Protection Policy 2017
- DFAT Preventing Sexual Exploitation, Abuse and Harassment Policy 2019
- Commonwealth Criminal Code Act 1995

MSA-Australia

- Code of Conduct
- Child Protection Policy
- Harassment prevention and Inappropriate Workplace Behaviour Policy
- Disciplinary Policy
- Statement on Human Rights and Working with Marginalised Groups and Vulnerable People
- Dismissal Policy
- MSA Internal Investigation and Disciplinary Panel Procedure Policy

MSA Network

- Child Safeguarding
- MSA's Intranet Protection of Whistle-Blower
- Respect in the Workplace Policy
- MSA International Investigation Procedure

4. OBJECTIVES

To ensure that all MSA board members, staff, volunteers, interns, contractors, and partners respect the dignity and basic human rights of all persons. Every person who represents MSA is expected to adhere strictly to this policy in the conduct of MSA's work. This includes personal time while staff members are travelling as part of their employment with MSA- Australia, and/or are representing MSA in any way.

5. SCOPE

The policy applies to:

- All MSA board members, staff, volunteers, interns, and contractors.
- All partners (i.e., implementing offices within the MSA Global Network) including their board members, staff, volunteers, interns, and contractors implementing aid and development activities funded by, or through, MSA-Australia.
- This policy should be read alongside MSA's Harassment Prevention and Inappropriate Workplace Behaviour Policies.

Child (plural 'children')	In accordance with the Optional Protocol to the Convention on the Rights of the Child, 'child pornography' means 'any representation, by whatever means, of a child engaged in real or simulated explicit sexual activities or any representation of the sexual parts of a child for primarily sexual purposes.' For further information regarding child pornography offences, refer to the Criminal Code Act 1995 (Australia).
Sexual exploitation and abuse (SEA)	 Occurs against a child or an adult and can occur between people of the same or different genders. It includes situations such as: Sexual exploitation and abuse Sexual harassment Child sexual abuse and exploitation People sexually exploited through sex work Possessing, controlling, producing, distributing, obtaining, or transmitting sexually exploitative images of adults and children
Sexual Exploitation	Any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially, or politically from the sexual exploitation of another.
Sexual Abuse	The actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. All sexual activity with someone under the age of 18 is sexual abuse.

6. **DEFINITIONS**

Age of Consent	Refers to age of consent requirements specified for sexual activity in the law of the host country, or the age of 18, whichever sets the greatest age.					
Sexual Harassment	Includes all conduct of a sexual or gender-determined nature at the workplace or connected to the workplace that is intended to violate the dignity of a person, or which has this effect. This can include unwanted physical, verbal, or non-verbal conduct of a sexual nature. that can include indecent remarks or sexual demands.					
Child Sexual	All forms of physical, mental, emotional, or sexual abuse, maltreatment					
Abuse	or exploitation directed towards children. Physical abuse includes violence, injury, and physical neglect. Mental and emotional abuse includes verbal assaults and bullying. Exploitation includes child labour, child pornography and commercial sexual exploitation. Both boys and girls can be the victims of child abuse. Child abuse can be inflicted on a child by men or women, or by young people themselves					
Child Exploitation	Committing or coercing another person to commit an act or acts of					
	 abuse against a child Possessing, controlling, producing, distributing, obtaining, or transmitting child exploitation material Committing or coercing another person to commit an act or acts of grooming or online grooming Using a minor for profit, labour, sexual gratification, or some other personal or financial advantage. 					
Online Child	In accordance with the Optional Protocol to the Convention on the Rights					
Sexual	of the Child, 'child pornography' means 'any representation, by whatever					
Exploitation (or	means, of a child engaged in real or simulated explicit sexual activities or					
child pornography)	any representation of the sexual parts of a child for primarily sexual purposes.' For further information regarding child pornography offences, refer to the Criminal Code Act 1995 (Australia).					
Safeguarding	Actions, policies, and procedures that create and maintain protective environments to protect people from exploitation, harm, and abuse. of all kinds.					
Survivor	A person who has SEA perpetrated against them or an attempt to perpetrate SEA against them.					
Vulnerable adult	A person is deemed vulnerable due to structural, cultural, systemic power dynamics and perceptions about a person which means they are more susceptible to being taken advantage of. Perceptions and power dynamics may exist around people for many reasons, including because of their gender, disability, or ethnicity. (A more detailed version of this definition can be found here: <u>https://assets.tear.org.au/files/TEAR_Safeguarding-Vulnerable-</u> <u>Adults-Policy.pdf</u>)					
Transactional sex:	The exchange of money, employment, goods, services, or other benefit for sex, including sexual favours.					
Workplace environments	This term is used within this context to mean any workplace environment, including an office and any other places where work may be conducted (i.e., when work related duties are being carried out in a place other than an office, e.g., in the field, at a conference, on a boat, in training etc), and may include more flexible, or social environments where there is a work endorsed or related activity.					

7. RESPONSIBILITIES

a. Executive Management are responsible for:

i. Ensuring that MSA complies with legislation and MSA policies.

- ii.Ensuring incidents of alleged SEA are investigated and reported on in accordance with MSA policies.
- iii.Ensuring that perpetrators of confirmed cases of SEA are managed in accordance with MSA policies.

iv. Promoting a culture of zero-tolerance of SEA and ensuring a survivor-centred approach.

v. Providing care and support to the 'survivor' of a SEA incident.

- b. People and Culture are responsible for:
 - i.Ensuring that managers and staff members, volunteers, interns, and contractors comply with relevant legislation and MSA policies.
 - ii. Providing procedures and guidelines to facilitate the elimination of SEA from MSA- Australia.
 - iii.Supporting and developing systems that maintain an environment that facilitates implementation of this Policy, and which prevents SEA.
 - iv.Conducting or coordinating investigations into alleged incidences of SEA
 - v. Managing grievance resolution and/or disciplinary processes.
 - vi.Providing advice, information, and training in relation to this Policy, including identifying and providing train-the-trainer training to relevant program staff.
- vii.Providing support and guidance to survivors and others who have been negatively impacted by SEA.
- c. People Managers are responsible for:
 - i. Ensuring compliance with relevant legislation and MSA policies.
 - ii.Contributing to workplace cultures that ensure the elimination of SEA from the workplace by providing information, encouraging the reporting of any incident of SEA, and taking action to stop the incident immediately.
 - iii. Escalating SEA related matters to the Executive and People and Culture.
- d. All staff members, volunteers, interns, and other respondents are responsible for:
 - i.Championing good practice and maintaining an organisational culture that prioritises safeguarding against SEA.
 - ii.Complying with this policy, the PSEA Code of Conduct, and the PSEA Risk Assessment.

iii.Immediately reporting any concerns relating to SEA by anyone covered by this policy.

8. PROCEDURES

e. Expected Behaviours

The following list of expected behaviours applies to all board members, staff, volunteers, interns, contractors, and partners:

i.At all times act in a manner which upholds the I-KODE values and reputation of MSA.

- ii.Undertake to create and maintain a safe and trusted environment that promotes the implementation of this Policy and safeguards everyone from SEA.
- iii.Comply with all relevant Australian and local laws of the country within which MSA work is being conducted.
- iv.Be aware that sexual behaviour is an area of sensitivity, where conduct may more easily be seen as offensive or be misinterpreted.
- v.Ensure personal conduct towards another is not exploitative or such that it reasonably leads to a perception of exploitation.
- vi.Do not engage in sexual relationships with activity participants, or MSA activity beneficiaries, or other people where there is unequal power dynamics and there is the potential for abuse of power. Such relationships undermine the credibility and integrity of MSA and its activities.
- vii.Board members, staff members, volunteers, interns, contractors, and partners must immediately inform their manager if they become engaged in a personal relationship which may be perceived as inappropriate or exploitative, or where real or perceived unequal power dynamics exist. Advice about whether relationships fall into this category should be sought from the People and Culture team.
- f. Communication and Training
 - i.MSA is committed to providing PSEA training as part of induction and during regular all staff meetings, providing relevant communications to primary stakeholders and other communications whenever otherwise deemed necessary, by:
 - 1. People & Culture for MSA staff.
 - 2. Trained MSA staff including the People & Culture team for relevant Partner Organisations.
 - ii. A Prevention of Sexual Exploitation and Abuse Code of Conduct (Annex 1) is signed by all staff. All signed copies will be retained by the People and Culture Team.
 - iii. MSA requires its Partner Organisations to similarly provide this commitment to MSA in writing
- g. Report Handling Procedure
 - i. Anyone from MSA, an implementing partner organisation, external organisation or civil society who suspects that an incident has occurred or that a risk of SEA exists must immediately report it to the MSA Managing Director (<u>alan.burrell@mercyships.org</u>) or Human Resource Manager/Child Protection Officer/PSEA Focal Point (<u>Melissa.Mason@mercyships.org</u>).
 - ii.Anyone wishing to make a report anonymously can do so using the Network's Whistleblower hotline Mercy Ships Compliance Message Centre: +1 903 939 7011 (ISC extension 7011) or email <u>confidential@mercyships.org.au</u> or call Mercy Ships Australia on <u>1300 739 899</u>
 - iii.Reporters are not required to confirm their suspicions or provide solid proof before making a report.
 - iv.Any person reporting a case of SEA, in good faith, or any person who has cooperated with an investigation into a report of SEA, will be protected from retaliation or any kind by MSA's

Whistleblower Policy. Malicious reporting of SEA with the intention of harming another person's integrity or reputation amounts to misconduct and is subject to disciplinary action. This is distinct from reports made in good faith based on the judgment and information available at the time of the report, which may not be confirmed by an investigation.

- v.The Managing Director immediately advises the President of the Board of breaches to this policy and convenes an internal rapid assessment committee comprising the People & Culture Director, and other members of the Executive Team deemed appropriate to the reported matter. Wherever possible this should de-identify the survivor, consistent with a survivor-centred approach.
- vi.The Managing Director, on advice, will determine appropriate action which may include referral of the matter to civil authorities such as police (with consideration of the wishes and welfare of the complainant/survivor); invoking the Internal Investigations and Disciplinary Panels Procedure; commencing internal disciplinary action up to and including dismissal in accordance with the Disciplinary Policy.

vii.All documents relating to reports of SEA will be retained by MSA for a period of seven years.

- viii.In cases where DFAT funding may be involved, the People & Culture Director/Child Protection Officer / PSEA Focal Point will immediately report to DFAT and liaise directly with the DFAT for advice and reporting.
- h. Breach of Policy

i.Any behaviour, or action that constitutes an act of gross misconduct is grounds for disciplinary action, up to and including termination of employment assignment, and:

- Referral to local law enforcement authorities (as per national and any mandatory reporting laws), where appropriate
- Referral to Australian Federal Police, where appropriate
- MSA internal investigation
- Suspension pending investigation
- Performance management
- Formal warning and monitoring
- Termination of employment or assignment

ii.Applying this policy may be difficult in some situations and sound judgement will be necessary. The policy cannot provide a specific response for every circumstance. MSA will apply the spirit and intent of this policy in the conduct of aid and development activities.

- iii.Feedback is important to MSA and its partner organisations as it encourages improvement. Therefore, all feedback is welcome. Feedback will be directed to the relevant department of MSA for action. A complaint regarding an alleged breach of the ACFID Code of Conduct can be made directly to ACFID (https://acfid.asn.au/content/complaints).
- i. Survivor support and assistance
 - i.MSA will adopt a survivor-centred approach in preventing and responding to SEA. MSA will ensure that all responses are developed in a manner that balances respect for due process with a survivor-centred approach in which the survivor's wishes, safety, wellbeing, dignity, and respect remain a priority in all matters and procedures. Furthermore, all actions taken should be guided by respect for choices, wishes, rights and dignity of the survivor.

- ii. MSA will ensure survivors of SEA are offered comprehensive information, support, and assistance such as referral to safe health/medical, psychosocial, and legal/justice response where appropriate and where required, to specialised children's or women's services.
- iii.Children have the right to participate in decisions that will affect them. If a decision is taken on behalf of a child, the best interests of the child shall be the overriding guide. Referrals should be done in consultation with child focused agencies specialising in the special needs of child survivors of sexual abuse, and who are familiar with local procedures relating to the protection of children.
- iv.MSA aims to involve survivors in decision making and will ensure that survivors will be provided with information on the progression of an investigation and final outcomes.
- v.MSA will not tolerate discrimination based on gender, age, race/ethnicity, ability, sexual orientation, or other characteristics in the PSEA process.
- j. Partner Organisations
 - i. This policy will be included in all contracts and memorandums of understanding with Partner Organisations and these requirements must also be applied to all downstream partners.
 - ii.No later than November of each financial year, MSA will organise an induction/workshop, which may be held either face-to-face or by other virtual means, at which this policy, its importance, and consequences of non-compliance, will be presented to the Partner Organisation's executive and relevant staff, volunteers, and contractors.
 - iii.All Aid and Development Activities funded by or through MSA and Partner Organisations and relevant staff, volunteers and contractors will be monitored to ensure they are not in breach of this policy. Monitoring will be proportionate to the amount of funding the risk of breach (as a result of the funded activities, organisation or skills and experience of board and staff) and will be recorded in the activity/project file. Monitoring will include at least one country visit annually at which this policy will be made the subject of special presentation.
 - iv.Applying this policy may be difficult in some situations and sound judgement will be necessary. The policy cannot provide a specific response for every circumstance. MSA will apply the spirit and intent of this clause in the conduct of Aid and Development Activities.

If this policy does not provide a clear answer on how to comply in a particular circumstance, MSA will document clearly the decisions made and the reasons behind them and make them available to both recipients and donors.

- v.Feedback is important to MSA and our Partner Organisations as it encourages improvement. Therefore, all feedback is welcomed. Feedback will be directed to the relevant Department of MSA for action. A complainant regarding an alleged breach of ACFID Code of Conduct can be made directly to ACFID (<u>https://acfid.asn.au/content/complaints</u>).
- k. Risk Assessment/Safe Programming
 - i. Project Managers are required to conduct a Prevention of Sexual Exploitation and Abuse Risk Assessment using the attached template at the beginning of the project, prior to commencing implementation. Project implementation partners may also use the Prevention of Sexual Exploitation and Abuse Risk Assessment tool (Annexe 2) to screen for; and mitigate; any Sexual Exploitation and Abuse risks associated with MSA activities.
 - ii.All staff, contractors, or other visitors travelling to the field or who will otherwise have contact (incidental or otherwise) with project participants or community members must read, understand, and sign the attached Code of Conduct (Annexe 1) prior to travel. MSA staff members must also sign the Code of Conduct at the commencement of their employment.

Project implementing partners must also sign the Code of Conduct on employment and renewal of employment contracts.

iii.Programs and projects should be designed carefully to avoid perpetuating power imbalances between project staff and project participants. Where appropriate, project design should avoid the transfer of financial, material, or occupational benefits or other situations that may put project staff in a position of power, whether perceived or actual. No individual staff member should be able to determine who should benefit from the project. Where transfer of benefits is unavoidable and opportunities to participate in the project are limited, a clear and transparent selection criterion must be established and communicated.

9. CONFIDENTIALITY AND DOCUMENT CONTROL

This Policy is available on internal MSA Human Resources platform for all employees and the MSA website.

- A copy of the Policy will be provided to any person or organisation on request.
- This policy will be reviewed at least every five years or earlier if warranted.

10. APPROVAL

Signature

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Name: Alan Burrell

Title: Managing Director

Date of Issue:

ANNEX 1: Prevention of Sexual Exploitation and Abuse Code of Conduct

Prevention of Sexual Exploitation and Abuse (PSEA) Code of Conduct

- At all times act in a manner that upholds the values and good reputation of MSA.
 - Comply with all relevant laws pertaining to the country within which MSA work is conducted, including during work related travel.
 - Be aware that sexual exploitation, harassment, and abuse is an area of sensitivity, where conduct may more easily be seen as offensive or be misinterpreted, particularly with respect to different cultural norms.
 - Ensure personal conduct towards others occasioned in the conduct of MSA work, is not exploitative, or could lead to a perception of exploitation.
 - Not sexually exploit, abuse, or sexually harass any person, including children or vulnerable adults*.
 - Not use a position of trust and authority of any other MSA resource to request or trade any services for sex, sexual favours, or other forms of humiliating degrading or exploitative behaviour from beneficiaries or anyone affected by MSA activities including adults and children, in return for protection or assistance. Never use the facilities, staff, or resources of MSA, partner organisations or third parties for the purpose of arranging or facilitating access to sex workers by any person, including visitors to MSA offices or programs.
 - Not engage in sexual activity with a child or vulnerable adult* under any circumstance. This
 includes in any country where the age of majority or the age of consent is lower than 18 years.
 Respondents to the PSEA policy are forbidden to engage in sexual activity with anyone under the
 age of 18 years. A mistaken belief that the child is over 18 years is not a defence.
 - Not use computers, mobile phones, video cameras, cameras, or other technology (including drones) inappropriately, or to exploit or harass children or vulnerable adults*, or access or disseminate exploitative material through any medium or channel.
 - Not have sex with sex workers when working or volunteering overseas, even when it is legal in the country.
 - Immediately report any concerns, suspicions or allegations of SEA or a breach of the PSEA Policy to the Managing Director, Human Resources Manager (who is the PSEA and Child Protection Focal Point), any board member or member of the Executive Team, or the MSA's Intranet Whistle- blower Hotline Mercy Ships Compliance Message Centre: +1 903 939 7011 (ISC extension 7011) or email confidential@mercyships.org.au and encourage and support others to do so.

I understand that the onus is on me, a person engaged by, to work in accordance with the MSA PSEA Policy and avoid actions or behaviours that could be construed as sexual exploitation or abuse.

Signed:

Date:

Witness signature:

Witness name:

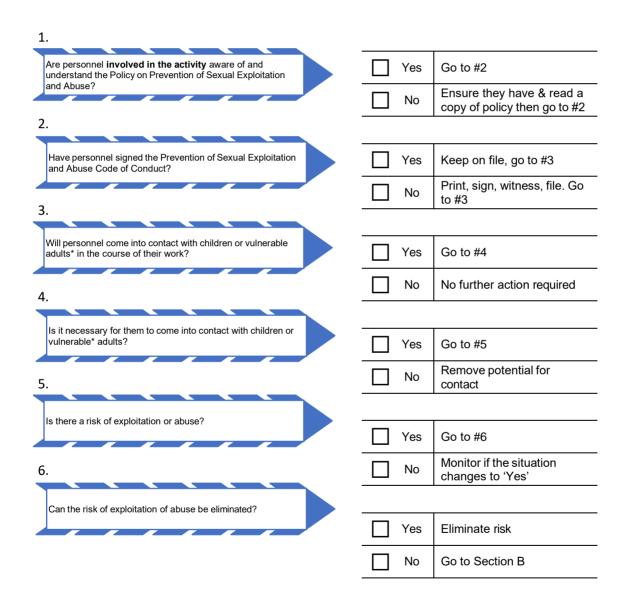
Date:

Vulnerable Adult: A person is deemed vulnerable due to structural, cultural, systemic power dynamics and perceptions about a person which means they are more susceptible to being taken advantage of. Perceptions and power dynamics may exist around people for many reasons, including because of their gender, disability, or ethnicity. (A more detailed version of this definition can be found here: https://assets.tear.org.au/files/TEAR_Safeguarding-Vulnerable-Adults-Policy.pdf)

ANNEX 2: PREVENTION OF SEXUAL EXPLOITATION AND ABUSE RISK ASSESSMENT

A. PREVENTION OF SEXUAL EXPLOITATION AND ABUSE RISK ASSESSMENT CHECKLIST

Please complete the following checklist in response to questions 1 to 6. If, at the end of the checklist, the answer to question #6 is 'No', the proceed to Section B. Prevention of Sexual Exploitation and Abuse Scenarios and Guidance and Section C. Actions to Eliminate or Mitigate Risks.



1. Personnel may be alone with children or vulnerable adults*	þ	Ensure that one on one situations do not occur and that another adult, ideally a staff member, is present	5. Personnel will be required to stay overnight in community	2	If possible, find commercial accommodation options
2. Personnel will have leisure time during field work	2	Ensure personnel are aware PSEA conditions apply even during leisure time.		2	If not possible ensure separate rooms and avoid sharing private bathrooms with community members.
3. Discussions with community members occurs within homes	2	Where possible choose another venue within line of sight of others	6. Project involves the transfer of financial, material, or occupational benefits or otherwise puts project personnel in a position of power (perceived or actual)	2	Ensure design is inclusive where persons wishing to participate are able to do so and individual members do not have the power to select beneficiaries.
		If no other venue possible, ensure discussions occur with multiple staff present and all household members consent to the visit.			If participation is limited, ensure clear and transparent selection criteria is established
4. Personnel become aware of community- based gender violence	2	a. Country staff are to be briefed by visiting personnel.	7. International personnel have different cultural views on SEA	2	a. Ensure visiting personnel are briefed on local cultural norms and SEA issues.
	2	b. Country staff progress agreed actions with relevant authorities as per community agreements.		2	b. Ensure visiting personnel are provided advice on how to interact with different communities

B. PREVENTION OF SEXUAL EXPLOITATION AND ABUSE SCENARIOS AND GUIDANCE

If personnel (staff, volunteers, contractors, or partner organisation) will have contact with children and vulnerable adults* before, during or after MSA work activities (events, activities, speaking events donation collecting, fundraising, site visits, community programs etc.) where sexual exploitation and abuse could occur or behaviours could be perceived to be of a sexual or abusive nature, use the following guidance:

Please send the completed checklist, indicate the relevant scenarios and guidance, document actions taken on the following page and forward all the completed paperwork to the Human Resources Manager, MSA.

C. ACTIONS TAKEN TO ELIMINATE OR MITIGATE RISKS

The actions I have taken to eliminate or eliminate or significantly mitigate the risk of sexual exploitation and abuse to children and/or vulnerable adults with the above guidance are:



*A person is deemed vulnerable due to structural, cultural, systemic power dynamics and perceptions about a person which means they are more susceptible to being taken advantage of. Perceptions and power dynamics may exist around people for many reasons, including because of their gender, disability, or ethnicity. (A more detailed version of this definition can be found here: <u>https://assets.tear.org.au/files/TEAR_Safeguarding-Vulnerable-Adults-Policy.pdf</u>)