


<h1>CHILD SAFEGUARDING POLICY</h1>			
Effective Date	1 March 2013		
Accountable Department	Operations		
Policy Number	IntlOp_01_v01_2017	Version	3 (updated Dec 2019)
Applicability	All employees, agents, consultants, volunteers, and any other representative of m2m. In addition, staff and representatives of partner agencies (subrecipients, subcontractors, suppliers/vendors) who have a formal relationship with m2m.		

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I. PURPOSE

This policy is informed by and conforms to international standards such as the *UN Convention on the Rights of the Child (UNCRC)*, *A Common Approach to Child Safeguarding for International NGOs* and *Policy/Guidance on the Implementation of USAID Child Safeguarding Standards*. This policy supersedes any previous versions of Child Protection policies issued by mothers2mothers (m2m). With this updated policy, we have changed the title to Child Safeguarding versus Child Protection. This is to emphasize the importance of promoting the **welfare** of children and **preventing** abuse. Child protection is only one piece of a larger child safeguarding approach.

m2m has a zero tolerance policy on any form of abuse, exploitation or violence towards children and recognises its duty of care to children who are in contact with the organisation, its programs, and partners. m2m recognises the International Standards for Child Protection, which provide a benchmark for agencies and organisations working with children. We affirm our belief in the right of all children to be protected from all forms of abuse, neglect, exploitation, and violence as set out in the UNCRC 1989. These standards include the guidance that all nongovernmental organisations (NGOs) working internationally should have a child safeguarding policy if its direct or indirect beneficiaries include individuals under the age of 18.

In addition to this overall organisational policy, the legal framework in the respective countries in which we work informs m2m's child protection procedures and practices. m2m complies with host country and local child welfare and protection legislation or international standards, whichever gives greater protection.

II. SCOPE OF THE POLICY

This policy applies to all m2m employees, agents, consultants, and volunteers. This policy also applies to the staff and representatives of partner agencies (subrecipients, subcontractors, suppliers/vendors) who have a formal relationship with m2m.

III. DEFINITIONS

- A. Child:** A child or children are defined as persons who have not attained 18 years of age.ⁱⁱ
- B. Child abuse, exploitation, or neglect:** Constitutes any form of physical abuse; verbal abuse; emotional ill-treatment; sexual abuse; neglect or insufficient supervision; trafficking; or commercial, transactional, labour, or other exploitation resulting in actual or potential harm to the child's health, well-being, survival, development, or dignity. It includes, but is not limited to: any act or failure to act which results in death, serious physical or emotional harm to a child, or an act or failure to act which presents an imminent risk of serious harm to a child.ⁱⁱⁱ
- C. Physical Abuse:** Constitutes acts or failures to act resulting in injury (not necessarily visible), unnecessary or unjustified pain or suffering, harm or risk of harm to a child's health or welfare, or death. Such acts may include, but are not limited to: striking, punching, beating, kicking, biting, shaking, throwing, stabbing, choking, or hitting (regardless of object used), or burning. These acts are considered abuse regardless of whether they were intended to hurt the child.^{iv}
- D. Neglect:** Constitutes failure to provide for a child's basic needs when the organisation is responsible for the care of a child in the absence of the child's parent or guardian.^v
- E. Emotional Abuse or ill treatment:** Constitutes injury to the psychological capacity or emotional stability of the child caused by acts, threats of acts, or coercive tactics. Emotional abuse may include, but is not limited to: verbal abuse, humiliation, control, isolation, withholding of information, or any other deliberate activity that makes the child feel diminished or embarrassed.^{vi}
- F. Sexual Abuse:** There are two different types of child sexual abuse. These are called contact abuse and non-contact abuse.
1. Contact abuse involves touching activities where an abuser makes physical contact with a child, including penetration. It includes:
 - a) Sexual touching of any part of the body whether the child's wearing clothes or not;
 - b) rape or penetration by putting an object or body part inside a child's mouth, vagina or anus;

- c) forcing or encouraging a child to take part in sexual activity; and/or
 - d) forcing or encouraging a child take their clothes off, touch someone else's genitals or masturbate.
2. Non-contact abuse involves non-touching activities, such as grooming, exploitation, persuading children to perform sexual acts over the Internet and flashing. It includes:
- a) encouraging a child to watch or hear sexual acts;
 - b) not taking proper measures to prevent a child being exposed to sexual activities by others;
 - c) meeting a child following sexual grooming with the intent of abusing them;
 - d) online abuse including making, viewing or distributing child abuse images;
 - e) allowing someone else to make, view or distribute child abuse images;
 - f) showing pornography to a child; and/or
 - g) sexually exploiting a child for money, power or status.^{vii}
- G. Exploitation:** Constitutes the abuse of a child where some form of remuneration is involved or whereby the perpetrators benefit in some manner. Exploitation represents a form of coercion and violence that is detrimental to the child's physical or mental health, development, education, or well-being.^{viii}
- H. Safeguarding:** Measures and structures to prevent and respond to abuse affecting children. It includes a set of policies, procedures and practices that we employ to ensure that m2m itself is a child safe organisation. We aim to ensure that everyone associated with the organisation is aware of and responds appropriately to issues of child abuse and the sexual exploitation of children. It is the means by which we ensure that anyone who represents our organisation behaves appropriately towards children and never abuses the position of trust that comes with being a part of m2m.

IV. GUIDING PRINCIPLES

- A. This policy is based on the following principles:
 - 1. All children have a right to protection.

2. The welfare of children is paramount.
3. All those who come into contact with children and their parents/caregivers in their everyday work have a duty to safeguard and promote the welfare of children.

B. We will do this by:

1. Preventing abuse, where possible, by setting in place and implementing systems and procedures to protect children through best recruitment practices, employee induction and training, creating an open and aware culture, assigning clear management responsibilities and involving children and their parents/caregivers appropriately in their own protection.
 - a) Best recruitment practices include screening employees, contractors, and consultants working either directly or indirectly with children. The vetting will involve, but will not be limited to: reference/background checks for criminal record or any convictions related to abuse of children, evidence of identity, authenticity of qualifications, and a request for appropriate references.
 - b) For professional positions, written reference checks are obtained from professional referees and kept on the employee file with the Human Resource Department. For site employees and Mentors who may not have a previous professional position, personal character references may be accepted. Candidates are checked for their suitability for working with children (past experience) and their understanding of child safeguarding. m2m will not engage candidates who have backgrounds unsuitable to working with children.
 - c) For Consultants, reference checks will be conducted for all consultants where there is any possibility that they will interact with children during the execution of their scope of work. All consultant screenings will be managed and filed by Grants and Compliance (G&C).
2. In the event of disclosure or discovery of abuse; setting in place clear guidelines and procedures for reporting and reacting, dealing promptly and properly with incidents, supporting victims and holding perpetrators to account.
3. Confidentiality will be maintained in dealing with allegations of child abuse by m2m employees, consultants, volunteers, subrecipients or representatives.

4. All representatives of m2m must demonstrate the highest standards of behaviour towards children in both their private and professional lives.
5. All employees of m2m are required to certify that they have read and understand the **Child Safeguarding Policy** as part of their new hire orientation process or as requested.
6. m2m will comply with all local labour laws regarding the employment of individuals under 18 years of age. Special care will be given to these employees to ensure that their work type and level is appropriate for their age and physical and mental capacity.

V. PROCEDURE

A. The following procedures shall be followed:

1. All employees, partners and other representatives must be made **aware** of the problem of child abuse and sexual exploitation and the risks to children. Children and their families will be made aware of the standards of behaviour they can expect from m2m representatives and of how they can raise a concern.
2. All children and their parents/guardians served by m2m will be made **aware** of their right to be safe from abuse. As the majority of children with whom m2m will have contact are under the age of 5 years old, the children's parents/guardians will be the first line of communication.
3. All employees, consultants, volunteers, and other representatives must **minimise risks and prevent harm** to children. Employees and managers are expected to create an environment where children's rights are respected and child abuse and sexual exploitation of children are prevented.
4. All employees, consultants, volunteers, and other representatives must be clear as to when to **report** concerns and what steps to take where concerns arise regarding the abuse or exploitation of children.
5. Actions taken to **respond** to allegations of abuse and/or exploitation must support, safeguard, and protect children when concerns arise.

6. When necessary during required training, m2m employees are permitted to bring their infants and an adult guardian to ensure security, continued care and support for the children. During sessions, they are also allowed to attend to their children's needs.
 7. m2m employees are instructed to conduct themselves appropriately and adhere to the protocols in place at all locations when interacting with children.
- B. All m2m representatives have a duty to act if children are not being protected and must respond **immediately** (within 24 hours) to:
1. A child who says either they or another child is/are being abused, neglected or exploited or who reports feeling unsafe;
 2. Allegations against a employee/consultant/volunteer or any other representative of m2m; and
 3. Concerns about a child's welfare where there is no specific disclosure/allegation.
- C. If an m2m representative suspects any misconduct on behalf of another m2m representative or a parent or guardian, they must report their concerns immediately to their line manager, Country Director (CD), or HR. After consulting with Head Office (HO), CDs or the most senior staff person available, will be responsible for reporting to the appropriate community services, including local child protection services. m2m will ensure that all Country Offices are equipped with information about how to contact the relevant local child protection authorities.
- D. m2m employees, partners, and other representatives will:
1. Never hit or otherwise physically assault or physically abuse children.
 2. Neither attempt, support/facilitate, nor engage in any form of sexual activity or sexual touching (sexual touching includes any form of touching, fondling, holding, kissing or hugging that is inappropriate in nature, done without ethical reason and/or culturally insensitive) with anyone under the age of 18 years regardless of the age of majority/consent or custom locally. Mistaken belief in the age of a child is not a defence.
 3. Refrain from engaging in any relationship with a child that is potentially or evidently exploitative in nature, including hiring a child as 'house help' or in any other domestic service role.

4. Never act in ways that may be abusive in any way or may place a child at risk of abuse.
5. Refrain from using language, making suggestions or offering advice, which is inappropriate, offensive or abusive.
6. Refrain from behaving physically in a manner that is inappropriate or sexually provocative.
7. Never have a child/children with whom they are working stay overnight at their home unsupervised unless exceptional circumstances apply and previous permission has been obtained from the child's parent or legal guardian and the employee's line manager.
8. Never sleep in the same room or bed with a child with/for whom they are working, whether in their own house, on project premises or elsewhere.
9. Never provide shelter to a child that is not their own (by birth, adoption, or legal custody) without the knowledge of the local authorities or obtaining permission from the child's parent or legal guardian.
10. Refrain from exploring, exposing, circulating, or taking photos of children that are sexual in nature (i.e., that show children's private parts, show children naked or inappropriately clothed, or show children in a pornographic posture).
11. Refrain from doing things for children of a personal nature that they can do themselves (i.e., helping a child to bath or dry themselves or helping a child to wipe themselves after using the toilet).
12. Never condone, or participate in, behaviour of children, which is illegal, unsafe or abusive.
13. Not act in ways intended to shame, humiliate, belittle or degrade children, or otherwise perpetrate any form of emotional abuse.
14. Not discriminate against, show unfair differential treatment or favour to particular children to the exclusion of others.
15. Refrain from spending excessive time alone with children away from others.
16. Not place themselves in a position where they are made vulnerable to allegations of misconduct.

- E. The above is not an exhaustive or exclusive list. Employees, partners and other representatives should at all times avoid actions or behaviours, which may allow behaviour to be misrepresented or constitute poor practice.
- F. In addition, all m2m employees and representatives will observe the following principles when in contact with a child:
1. Recognise and respect local norms pertaining to the use of local languages, conversation, and intimacy with children.
 2. Exercise caution and sensitivity in disclosing any information related to a child that could endanger his/her physical, psychological, social, economic or cognitive development, safety or security.
 3. Come forth with any available information related to incidence of harm done to a child or a situation that causes potential danger to a child.
 4. As much as possible, the working environments of employees, consultants and volunteers should be prepared and organized in such a way as to minimize risk to children and should be as visible and accessible as possible. m2m recognises that many interactions between m2m representatives take place in the child's home and therefore the m2m representative will have little control over the environment. However, as much as possible, m2m representatives should avoid being left alone with a child in a household environment.
 5. Be conscious of those circumstances that may present risks for children and appropriately and responsibly take control of the situation.
 6. Ensure accountability among themselves and fellow employees (within and outside the work environment) in adhering to this Policy, such that inappropriate practices and/or potentially violent behaviour does not go unchallenged.
 7. Prior to engaging children in program activities, it is necessary that they and their parents or guardians are informed about the anticipated level of contact they will have with m2m employees, consultants, and volunteers associated with the activity.

8. Program activities in which children are involved without a parent, guardian or caregiver present must always be preceded by the obtaining of informed consent from the parent or guardian of each child. In cases where m2m is working within a facility not managed by m2m (such as an ECD facility), m2m should always be with a centre manager or instructor when interacting with a child if the parent or guardian is not present.
9. Children's privacy and dignity must always be respected in photos and other materials that feature their life stories (e.g., reports, success stories, articles, case studies, etc.) and documented informed consent must be obtained from parents or guardians before content is used.
10. All children should be equally encouraged to participate in appropriate m2m programs regardless of their or their parent or guardian's race, culture, age, gender, physical or mental ability, religion, sexuality, or political views.
11. In any given activity, children should be permitted to discuss among themselves their rights and responsibilities, acceptable and unacceptable treatment/behaviour, and the proper course of action in the case of rights violations. Children and their parents or guardians must also be encouraged to raise protection concerns or rights violations that arise.
12. Whenever possible and practical, employees and agents should employ a 'two-adult' rule when working with a child/children, such that two or more adults must be present at all times during activities in which children are involved. The second person could be a fellow employee, a local leader, known community member, parent, guardian, or caregiver. If services are being provided in medical and/or government facility, a medical professional or government employee could also serve as the "second person."
13. All concerns raised by children (no matter how large or small) must be taken seriously and acted upon immediately.
14. Employees or other adults who raise concerns about issues regarding children's protection should receive maximum support in reporting/handling such incidences.
15. All reporting of incidents, whether confirmed or suspected, should be followed up diligently and as soon as reasonably possible (generally within no more than 48 hours).

VI. COMMUNICATION

- A. Dissemination of this **Child Safeguarding Policy** and the procedures that support it will be communicated to all m2m employees, consultants, volunteers, and representatives:
1. Within the terms and conditions of the organisation's standard contract of employment.
 2. On joining the organisation as part of the induction process, all new employees will be required to certify with their signature that they have read and understand the **Child Safeguarding Policy** as part of the their acceptance of the Code of Ethics and Conduct.
 3. As part of the organisation's feedback on the annual risk assessment.
 4. As part of internal training, including pre-service training for site employees.
 5. Through updates to the policy circulated no less than every three years.

VII. DEALING WITH ALLEGATIONS OF CHILD ABUSE

- A. In each Country Office, the senior HR representative will be designated as the Child Safeguarding Officer and will coordinate all reporting of child safeguarding issues to the Country Director and/or Head Office. In Country Offices where no HR representative is retained, the Country Director will serve as the Child Safeguarding Officer. Any employee who does not wish to report directly, may use m2m's whistle-blower email account: whistleblower@m2m.org.
- B. Any individual or employee who wishes to report a safeguarding allegation involving m2m, its employees or representatives may also report directly to the Safeguarding Officer of the m2m South Africa Board of Directors, Herschelle Milford (herschellepn@gmail.com).
- C. All allegations of misconduct **involving an m2m employee, consultant, volunteer or representative** and a child/children brought to the attention of m2m management will immediately result in an investigation and resolution. All investigations will be coordinated through HR and will adhere to the following:

1. Any suspicion or allegation of child abuse or exploitation by an m2m employee, consultant, volunteer or representative shall be reported immediately (within 24 hours) to the Child Safeguarding Officer (in-country senior HR representative) and the Country Director. The Child Safeguarding Officer will report incidences immediately to the Country Director if they were not included in the original report. The Country Director will report the incident to the Head Office HR Department immediately. If the incident is being reported at the Head Office level, it should be reported directly to the Director of HR. An internal investigation will be initiated by the HR Department in conjunction with m2m's legal advisor in country. The HR Department will be responsible for documenting the situation and immediately sharing it with the Chief Operations Officer (COO) and Chief Executive Office (CEO) of m2m. The HR Director will be required to monitor such issues and share documentation with the COO, CEO, and, when necessary, local authorities. Reports must be addressed immediately (if the abuse is active and/or ongoing); and quickly (within 48 hours) if the abuse is not active or ongoing.
2. An investigation of an m2m representative will consist of interview notes, pertinent documents, witness statements, hard copies, electronic mail (e-mail) messages, and in some cases, audio or videotape. The documents will be gathered in a timely manner. Depending on the severity of the matter, any investigation or reported cases of child abuse will be followed up immediately and resolution made within 1-4 weeks giving priority to the best interest of the child. At all times, m2m will use efficiency and confidentiality in handling investigation documents. m2m will refer all cases to local authorities including police and provide them with all materials related to the incident.
3. During the investigation, the names of person(s) filing the report and/or of person(s) conducting the investigation will remain confidential.
4. Persons reporting the incident including children, parents, guardians or caregivers and persons who have witnessed inappropriate conduct, will be treated respectfully to avoid any further traumatization. Statements made by the complainant will be kept in appropriate confidentiality. The complainant will be:
 - a) Subject to an internal investigation to verify all relevant facts.
 - b) Given the opportunity to provide relevant facts.

- c) Given the opportunity to participate in the investigation by providing names/identities of other witnesses and by recommending questions to be asked by investigators during the investigation.
 - d) Be provided information on the results of the investigation.
5. Treatment of the alleged perpetrator will be guided by the following:
- a) m2m will notify the individual (e.g., employee, consultant, volunteer, or partner organisation) of the allegation and investigation in writing.
 - b) If the alleged perpetrator is an m2m employee, consultant or volunteer, they will be placed on immediate leave pending the outcome of the investigation. If the alleged perpetrator is an employee of an m2m subrecipient or contractor, m2m will suspend the subagreement or contract immediately if the subrecipient or contractor organisation does not initiate an adequate investigation and response.
 - c) The alleged perpetrator will be given an opportunity to respond to the claim in the form of a written document.
 - d) He/she will be asked to provide other pertinent information and witnesses.
 - e) He/she will receive a written memorandum of m2m's final determination at the conclusion of an investigation. This memorandum may include, but not be limited to, notification of corrective action to be taken by m2m, up to and including termination. All cases will be referred to local law enforcement as appropriate.
6. Under no circumstances will an employee, consultant, or volunteer who is dismissed as a result of misconduct with a child/children be eligible for rehire with m2m at any time.
7. During an investigation of an m2m employee, consultant or volunteer, the HR Director will be tasked with mobilising internal resources to review data, implement safety measures, and ensure that any child involved in an investigation is protected from ongoing contact with the alleged perpetrator. When situations are referred to local authorities, m2m Country Directors and Country HR Representatives will be tasked with monitoring follow-up and closing any case documentation. The HR Director will provide updates on any cases in Senior Management Team meetings, and within reports to the Board(s) of Directors.

- D. All allegations of abuse involving a parent, guardian or caregiver reported to or witnessed by m2m employees must be reported immediately to the Child Safeguarding Officer (In-country senior HR representative) who will report to the Country Director. The Country Director will inform Head Office HR and, based on HR guidance, the Country Director will refer the case to local law enforcement and/or social services as appropriate within 48 hours. It will be the responsibility of the Country Director and the Child Safeguarding Officer to follow-up on the case with local authorities and document its conclusion(s). There will not be an internal investigation by m2m of allegations against a parent, guardian or caregiver, unless an m2m employee, consultant or volunteer is implicated in the abuse or did not appropriately report the abuse.

VIII. CONFIDENTIALITY

- A. All reports of child abuse must be treated seriously and impartially, and appropriate confidentiality must be maintained. However, m2m reserves the right to disclose information to other organisations or authorities involving employees terminated on the basis of child protection violations.
- B. Information pertaining to incidents in which children's rights have been violated should be shared according to a 'right' and 'need to know' basis, as deemed necessary by the HR Director. In all instances, children's names and identities must not be disclosed beyond the appropriate management personnel, unless appropriate authorization has been received.
- C. m2m discourages communication regarding child rights violations via email, unless absolutely necessary. If email is necessary, subject headings should be inoffensive and must be flagged as confidential. Any messages concerning child rights violations directed to or shared with people outside m2m (e.g., press or police) must first obtain written authorization by the Director of HR, or by designated senior management personnel.

IX. MONITORING

- A. Child Safeguarding will be incorporated into m2m's risk register and annual reporting processes. Senior management will regularly review the risk register and organisation reports to ensure that child safeguarding measures are in place and effective.
- B. This policy will be reviewed at minimum every three (3) years or whenever there is a significant change in the organisation.

X. SUBRECIPIENT ORGANISATIONS

- A. m2m recognises the importance for its subrecipients to have in place child safeguarding policies and procedures.
 - 1. Subrecipient organisations must have their own organisational child safeguarding policies, which provide the same, or higher, safeguarding of children as m2m, or agree to adopt m2m's **Child Safeguarding Policy**.
 - 2. Management of subrecipient organisations must have in place administrative and HR procedures to handle employees that contravene the organisation's Child Safeguarding Policy.
 - 3. In an event that m2m enters a partnership with a government agency, such as schools, health facilities or any ministry, the national policy, standards and guidelines take precedent and must be used in conjunction with m2m's **Child Safeguarding Policy**.
- B. Any person in the field working with m2m subrecipients who experiences a situation that raises concern for a child/children, must immediately report any concerns to the head of the partner organisation or his/her designee.
 - 1. The details of the situation should be put in writing and a copy sent to the m2m Country Director and the Head Office HR and Grants & Compliance departments.
 - 2. The Country Director and Head Office will be responsible for following up with the subrecipient to obtain details of the conclusion of their investigation.
 - 3. If the subrecipient does not take appropriate actions to investigate the allegations, m2m will take steps to either launch their own investigation and/or terminate the agreement with the subrecipient.

XI. CONSEQUENCES FOR NON-COMPLIANCE

- A. m2m has a zero tolerance policy on any form of abuse, exploitation or violence and recognises its duty of care to children who are in contact with the organisation, its programs and partners. Any violation of m2m's **Child Safeguarding Policy** constitutes disciplinary action or dismissal as provided for in m2m internal procedures and HR policy. The personal conduct of those engaged in work for m2m, either as direct employees, consultants, volunteers, representatives or as employees of m2m's partners will be measured against this Policy and all persons will be held accountable whether on or off duty.

XII. POLICY VERSION CHANGE TABLE

Version	Details of changes made
2	<ol style="list-style-type: none"> 1. Change protection to safeguarding to be in line with current standards 2. Updated definitions to align w/USAID Standard Provisions and ADS 3. Updated employee guidance on what NOT to do and added new principles of behaviour 4. Updated reporting section to be more detailed on action steps 5. Updated confidentiality section to add more detail about the protection of a child's identity during investigations 6. Added a monitoring section 7. Updated subrecipient organisation section to add requirement that subrecipients have their own child safeguarding policy or accept ours 8. Updated consequences section to emphasize "zero tolerance" for abuse
3	<ol style="list-style-type: none"> 1. Add m2mSA Board Safeguarding Officer and contact information.

Approved and Reviewed by:

Name	Title/Department	Signature	Date
Frank Beadle de Palomo	President & CEO		18-02-2020

Related Policy(ies)/Procedures	IntlOp_02_v01_2017 Anti-Human Trafficking Policy
Source/Reference	<ul style="list-style-type: none"> - The Standards for Child Protection by the Keeping Children Safe Coalition: http://bettercarenetwork.org/library/social-welfare-systems/standards-of-care/keeping-children-safe-standards-for-child-protection - Policy/Guidance on the Implementation of USAID Child Safeguarding Standards: http://pdf.usaid.gov/pdf_docs/PBAAC747.pdf UK National Society for the Prevention of Cruelty to Children (NSPCC): https://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/child-sexual-abuse/?utm_source=meganav&utm_medium=&utm_campaign=

ⁱ The Standards for Child Protection by the Keeping Children Safe Coalition: <http://bettercarenetwork.org/library/social-welfare-systems/standards-of-care/keeping-children-safe-standards-for-child-protection>

ⁱⁱ Policy/Guidance on the Implementation of USAID Child Safeguarding Standards: http://pdf.usaid.gov/pdf_docs/PBAAC747.pdf

ⁱⁱⁱ Ibid.

^{iv} Ibid.

^v Ibid.

^{vi} Ibid.

^{vii} UK National Society for the Prevention of Cruelty to Children (NSPCC): https://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/child-sexual-abuse/?utm_source=meganav&utm_medium=&utm_campaign=

^{viii} Policy/Guidance on the Implementation of USAID Child Safeguarding Standards: http://pdf.usaid.gov/pdf_docs/PBAAC747.pdf

