

SPIRE SAFETY



SEXUAL & GENDER-BASED HARASSMENT PREVENTION PLAN

SS-WHS-PLA-000

DOCUMENT HISTORY

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1 Purpose

The purpose of this harassment prevention procedure is to establish guidelines and practices for managing the risks of harassment, including sexual and gender-based harassment, in our workplaces. This procedure focuses on both proactive prevention and effective response.

2 Scope

This procedure applies to all employees, contractors and personnel who perform tasks or activities within our organisation. It applies at all times while performing work, attending work-related events, or representing the organisation.

3 Harassment Prevention Procedure

3.1 Identified Risks and Control Measures

3.1.1 Risks Identified and Controls

Risk #	Risk	Controls
Risk 1	Isolated or unsupervised work environments	Buddy systems; avoid solo shifts; improve lighting and supervision
Risk 2	Power imbalances (e.g. manager-subordinate)	Implement regular leadership training on ethical conduct and boundaries
Risk 3	Gendered workplace culture or attitudes	Workshops or internal training on respectful behaviours; communicate zero tolerance policy
Risk 4	Inadequate or unclear reporting systems	Anonymous and accessible reporting channels; assign a trained SGBH officer
Risk 5	Lack of training on respectful behaviour	Mandatory induction and refresher training on harassment and respectful conduct
Risk 6	Understaffing, long hours, high workload	Review of rosters and workload balance; introduce regular wellbeing check-ins

It is determined that a Moderate Risk Level exists. This risk rating considers:

- The potential severity of harm from harassment (psychological injury, career harm)
- The duration and frequency of potential harassment
- The likelihood of harassment occurring in identified settings
- Availability and suitability of existing control measures

IT also takes into consideration workplace specific factors, including:

- The layout and security of the physical work environment (e.g. private rooms, night shifts)
- The design and management of work (e.g. authority structures, work demands)
- Systems of work and communication (e.g. clarity of reporting processes)
- Training, information, and supervision adequacy
- Workplace culture and leadership behaviours

3.2 Consultation Undertaken

The following consultation must be undertaken with workers:

- Consultation was undertaken with workers during toolbox talks, staff meetings, and via an anonymous survey during the risk assessment process.
- Feedback from health and safety representatives (HSRs) and the WHS Committee was sought on risks and proposed control measures.
- Workers were invited to participate in the development of reporting procedures and prevention training.

3.3 Procedures for Reporting and Responding to Harassment

How a Person May Make a Report

- Verbally or in writing to their supervisor, HR, or designated SGBH Officer
- Anonymously
- Through a health and safety representative

How Reports Will Be Investigated

- Promptly and confidentially investigated within 5 working days
- Conducted in a trauma-informed, impartial, and procedurally fair manner

Representation

- Any person making a report may choose to be supported or represented by a representative of their choice (e.g. union, colleague, legal support)

Communication of Investigation Outcomes

- The reporting person and relevant parties will be informed of the outcome and any resulting actions, to the extent legally appropriate

Additional Options

- The reporting person may also initiate:
- Issue resolution under WHS Act Division 5
- Dispute resolution under WHS Act Division 7A
- External complaints via the Fair Work Ombudsman or AHRC

3.4 Training, Awareness, and Access

- All workers receive training at induction and annually
- Training includes rights, responsibilities, how to report, and bystander action
- Copies of this plan are:
 - Published on the internal staff portal and shared via email
 - Available in printed format in communal areas and on request
 - Explained during WHS induction and leadership meetings

4 Reference Documents

The following documents are referenced within this procedure:

- [Document 1](#)
- [Document 2](#)