

Sexual Harassment Prevention Plan & Policy

Accurate Recruitment Pty Ltd

Version 1.0 | Prepared: 1 September 2026 | Document owner: Management

Document status	Active: September 1, 2026
Applies to	All employees, labour-hire workers, candidates during recruitment activity, contractors, visitors and work-related third parties
Accountable role	Director / nominated senior manager (to be confirmed by Accurate Recruitment)
Review date	19 th October 2027

Important implementation note: This is a practical draft tailored to a Queensland recruitment and labour-hire business. Management must consult workers, confirm the named responsible people and reporting channels, assess actual work locations and client-site risks, and approve the plan before issuing it. It is not a substitute for legal advice.

1. Purpose and commitment

Accurate Recruitment Pty Ltd (Accurate) is committed to a workplace and recruitment environment where everyone is treated with dignity and respect. Sexual harassment, sex-based harassment, sex discrimination, hostile conduct on the ground of sex and victimisation are not accepted. Accurate will take proactive, reasonable and proportionate steps to prevent these behaviours, respond promptly when concerns arise, and review whether controls are effective. Prevention is a management responsibility. Workers are not required to experience or report harassment before Accurate takes reasonable steps to identify and control risks.

2. Scope and where this applies

This policy and plan applies to conduct connected with work, including:

- Accurate’s office, interview rooms, reception, meeting rooms and any other work premises.
- Client workplaces and sites where labour-hire workers are placed, including warehouses, workshops, construction and industrial sites.
- Recruitment activities, candidate interviews, screening calls, reference checks, onboarding, inductions, site visits and client meetings.
- Work travel, training, conferences, work functions, social events connected with work, accommodation arranged for work and work-related transport.
- Telephone calls, email, SMS, messaging apps, social media, video calls and other digital communications connected with work.
- Conduct by or towards employees, labour-hire workers, job applicants, clients, supervisors, contractors, visitors and other third parties.

3. Definitions and examples

Sexual harassment generally means unwelcome sexual conduct where a reasonable person, having regard to all the circumstances, would anticipate the possibility that the person subjected to the conduct would be offended, humiliated or intimidated. A single incident may be enough. The person responsible does not have to intend harm.

Examples can include, but are not limited to:

- Unwanted touching, physical closeness, blocking someone's movement, staring or sexual gestures.
- Sexual comments, jokes, propositions, repeated requests for dates or intrusive questions about someone's body, sex life or relationships.
- Sending or displaying sexual images, explicit messages, pornography or sexually suggestive material.
- Unwelcome sexual advances or pressure linked to shifts, placements, pay, promotion, references, ongoing work or other employment benefits.
- Sex-based harassment, sexist insults or degrading comments, or conduct that creates a hostile environment on the ground of sex.
- Treating someone adversely, threatening them or excluding them because they raised a concern, supported another person or refused sexual attention.

Reasonable workplace interaction, respectful conduct and consensual relationships are not automatically harassment. However, consent must be freely given, and a power imbalance or work-related pressure must be considered. This policy does not prevent a person from raising a concern or making a lawful external complaint.

4. Responsibilities

Role	Responsibilities
Director / Senior Management	Approve and resource this plan; lead by example; ensure risks are assessed and controlled; appoint a suitable contact and alternate; ensure reports are handled fairly; review incidents and control effectiveness; take action where a client site presents unacceptable risk.
Team Leaders / Consultants	Model respectful conduct; discuss site-specific risks with workers and clients; explain reporting options before placement; check in with placed workers; promptly escalate concerns; do not investigate matters beyond their authority or promise absolute confidentiality.
All employees and labour-hire workers	Treat others respectfully; follow this policy and site rules; participate in consultation and training; report hazards or concerns where safe to do so; preserve relevant messages or records; cooperate honestly with a fair process.
Clients and host employers	Provide a safe work environment; communicate site rules and reporting contacts; cooperate with Accurate on prevention and response; promptly notify Accurate of relevant incidents; prevent retaliation; implement agreed controls at their sites.
Nominated Complaint Contact	Receive reports sensitively; document the concern securely; assess immediate safety and support needs; explain available options; escalate conflicts of interest; coordinate a fair, timely response and follow-up.

5. How to raise a concern

A person may report an incident, risk or concern verbally or in writing. A formal written complaint is not required. Reports can be made by the person affected or by a witness.

Internal reporting options (management must complete these details before publication):

Primary contact	Name / role: Lindley Watson DIRECTOR Phone: 07 3865 6333
Alternative contact	Name / role: Bethany Mitchell
Senior escalation	Director / nominated senior manager: Lisa Watson
Urgent danger	Call 000 if there is immediate danger. Move to a safe place and contact site emergency personnel where appropriate.

A person can also seek advice or make a complaint to an external body. Internal reporting is not a condition of accessing external options.

- Australian Human Rights Commission: <https://humanrights.gov.au/> (workplace sexual harassment and positive duty information).
- Fair Work Commission: <https://www.fwc.gov.au/> (information about workplace sexual harassment dispute and stop sexual harassment order processes).
- WorkSafe Queensland: <https://www.worksafe.qld.gov.au/> (work health and safety risks and prevention plans).
- Police: contact 000 for emergencies or local police for suspected criminal conduct where appropriate.

6. Response process

Listen and respond respectfully. Thank the person for raising the concern. Listen without blame, disbelief or unnecessary questioning. Ask what support they need and whether they feel safe now.

Address immediate safety. Consider separation from the alleged harasser, safe transport, changes to reporting lines or work arrangements, site removal, medical care or other interim controls. Consult the affected person where practicable. Do not automatically disadvantage the person who raised the concern.

Record the report securely. Record the date, people involved, what was reported in the person's own words where possible, witnesses, relevant messages or documents, immediate risks, support requested and agreed next steps. Explain that information will be shared only with people who need it to respond, but confidentiality cannot be guaranteed in every circumstance.

Assess and decide the appropriate process. A suitably impartial person will assess the allegations, conflicts of interest, seriousness, risk and whether an investigation or another resolution process is appropriate. Informal resolution must not be forced or used where unsafe or inappropriate.

Investigate fairly where required. Give relevant parties a reasonable opportunity to respond; gather relevant evidence; keep an open mind; protect privacy as far as practicable; avoid unnecessary delays; and document findings and the reasons for decisions. Use an independent investigator if senior management is involved or impartiality is in doubt.

Take proportionate action. Depending on findings, action may include training, a direction to stop conduct, changes to work arrangements, client-site controls, a formal warning, disciplinary action up to termination of employment or engagement, ending a client placement or other lawful steps.

Follow up and prevent recurrence. Check in with the affected person and relevant workers, monitor retaliation or further risk, confirm controls are working and record lessons learned. A person's report must not lead to adverse treatment because they raised it in good faith.

7. Risk assessment and prevention controls

Accurate will assess risks in consultation with workers and, where relevant, host employers. The risks below are an initial baseline for a recruitment and labour-hire business and must be validated against actual work arrangements and sites.

Work area / hazard	Risk factors	Controls / actions	Owner	Timing
Office, reception and interviews	One-to-one meetings; private rooms; visitors; power imbalance between recruiter and candidate; inappropriate comments or messages.	Use visible/interview-safe spaces where practicable; keep meeting rooms accessible; make another staff member available; set clear professional boundaries; ensure candidates know how to raise concerns; supervise visitor access; provide a clear reporting contact.	Management / Team Leader	At induction; review after concern or office change
Client and host-employer sites	Different site cultures and procedures; supervisors controlling shifts; isolated work areas; male-dominated or hierarchical environments; client/worker dependence.	Pre-placement site risk check; confirm host reporting process and emergency contacts; include harassment in site induction; agree that incidents are reported to Accurate promptly; consult workers; conduct site visits/check-ins; escalate and pause/remove placements where necessary to protect safety.	Account Manager / Team Leader + host employer	Before placement; during assignment; after any report
Work-related travel, functions and accommodation	Alcohol; late hours; transport; accommodation; informal social settings; reduced supervision.	Set expectations before events/travel; provide safe transport and accommodation arrangements; make attendance voluntary where appropriate; provide a contact for concerns; manage alcohol responsibly; do not tolerate harassment at work functions.	Management / event organiser	Before each event or trip
Phone, email and online communication	Unwanted sexual messages, images, comments, after-hours contact, social media contact or group-chat behaviour.	Professional communication standards; prohibit sexualised messages/images; use work channels where practicable; preserve relevant records; provide a route to report digital conduct; address misuse promptly.	All managers and workers	Ongoing; review when systems change
Recruitment, placement and employment decisions	Harassment linked to job opportunities, shift allocation, references, pay, ongoing placement or fear of losing work.	Make decisions on legitimate work criteria; keep placement and performance records; avoid private or ambiguous arrangements; provide alternative reporting routes; prohibit threats or retaliation; review decisions where a complaint overlaps with work allocation.	Management / recruitment team	Ongoing; periodic review
Reporting and response	Workers may fear losing shifts, being labelled difficult, not being believed or having information shared widely.	Offer more than one reporting path; explain anti-retaliation protections; respond promptly and sensitively; maintain restricted records; use impartial decision-makers; check for retaliation after a report.	Nominated Complaint Contact / Management	After every report; quarterly check of process

8. Training, consultation and communication

- Provide induction on this policy to all employees and relevant labour-hire workers, including how to report concerns and the prohibition on victimisation.
- Provide periodic refresher training for staff and targeted guidance for leaders on responding to disclosures, maintaining boundaries, managing conflicts of interest and handling reports.
- Discuss site-specific risks and reporting contacts with placed workers before commencement and whenever a new site, role or significant risk arises.
- Consult workers when identifying hazards, choosing controls and reviewing this plan. Consultation may occur through team meetings, one-to-one discussions or confidential feedback.
- Make the policy accessible to workers in a format and language they can understand, and explain that the policy applies regardless of position, gender, employment type or who engages the person.

9. Records, privacy and non-retaliation

Records relating to reports, risk assessments, investigations, training and control reviews must be stored securely with access limited to authorised people. Information will be handled sensitively and shared only where reasonably necessary to assess risk, respond fairly, meet legal obligations or implement controls. Accurate will not promise absolute confidentiality. Records must be retained and disposed of in line with applicable legal requirements and Accurate's records practices.

Victimisation or retaliation is prohibited. This includes reducing shifts, withdrawing opportunities, threats, intimidation, ostracism or adverse treatment because a person raised a concern, supported someone else or participated in a process. Knowingly false or malicious conduct may be addressed through a fair process; a report is not false merely because it cannot be substantiated.

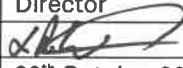
10. Monitoring, review and improvement

- Review this plan at least annually and sooner after an incident, a near miss, a change to work arrangements or legislation, a new client/site, or evidence that a control is not working.
- Review trends in reports, worker feedback, site visits, training completion, response times and repeated issues while protecting privacy.
- Consult affected workers and relevant host employers when reviewing controls.
- Record the review date, participants, findings, actions, responsible person and due date. Track actions until completed.
- Where a client cannot or will not implement adequate controls, management must consider further controls, alternative duties, pausing placements or ending the arrangement where lawful and reasonably necessary.

11. Implementation checklist

- ☒ Management approves this policy and prevention plan.
- ☒ Primary and alternate complaint contacts and contact details are completed.
- ☒ Workers are consulted on the initial risk assessment and proposed controls.
- ☒ Client/host-employer reporting and escalation arrangements are confirmed for each active site.
- ☒ Policy is provided to employees and relevant labour-hire workers; induction and training records are maintained.
- ☒ A secure location and restricted access process for complaint records is established.
- ☒ A review date and action register are scheduled.

12. Approval

Approved by	Lindley Watson
Position	Director
Signature	
Date	20 th October 2026

13. Legislation and official guidance

This document is designed to support, not replace, compliance with applicable legislation and official guidance. Management should confirm current requirements and seek legal or WHS advice where needed.

- **WorkSafe Queensland — Sexual harassment and sex or gender-based harassment:**
<https://www.worksafe.qld.gov.au/safety-and-prevention/mental-health/Psychosocial-hazards/sexual-harassment-and-sex-or-gender-based-harassment>
- **WorkSafe Queensland — Managing the risk of psychosocial hazards at work Code of Practice 2022:**
<https://www.worksafe.qld.gov.au/laws-and-compliance/codes-of-practice/managing-the-risk-of-psychosocial-hazards-at-work-code-of-practice-2022>
- **Australian Human Rights Commission — Positive duty under the Sex Discrimination Act:**
<https://humanrights.gov.au/know-your-rights/rights-of-individuals/workplace-rights/positive-duty-sex-discrimination-act>
- **Australian Human Rights Commission — Guidelines for complying with the positive duty:**
<https://humanrights.gov.au/resource-hub/resources-for-organisations-businesses/positive-duty-pdfs/guidelines-for-complying-with-the-positive-duty-under-the-sex-discrimination-act-1984-cth>
- **Fair Work Commission:** <https://www.fwc.gov.au/>

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