
SEXUAL ASSAULT AND SEXUAL HARASSMENT POLICY

PSION





TABLE OF CONTENTS

TABLE OF CONTENTS.....	1
DOCUMENT CONTROL	2
CONFIDENTIALITY	3
DISCLAIMER	3
1 INTRODUCTION	4
2 DEFINITIONS.....	4
2.1 SEXUAL HARASSMENT	4
2.2 WHAT ARE EXAMPLES OF SEXUAL HARASSMENT?	4
2.3 SEXUAL ASSAULT	5
2.4 IMPACTED PERSON	6
2.5 PERPETRATOR.....	6
2.6 WORKPLACE	6
2.7 WORKER	6
2.8 BYSTANDER	6
2.9 MANAGEMENT OF SASH.....	7
2.10 VICTIMISATION.....	7
3 ELIMINATION OF SASH	7
4 RISK MANAGEMENT	7
4.1 RISK MANAGEMENT REVIEW.....	8
5 REPORTING INCIDENTS OF SASH	8
5.1 REPORTING PATHWAYS	9
6 INCIDENT REPOSE.....	10
6.1 RESOLUTION PROCESSES.....	10
6.2 CRIMINAL CONDUCT	11
6.3 MANDATORY WORK HEALTH AND SAFETY REPORTING	11
7 DISCIPLINARY ACTION	11
8 MENTAL HEALTH SUPPORT.....	12
9 IMPLEMENTATION.....	13
10 CONTACT INFORMATION	13



DOCUMENT CONTROL

Document Control Information	
Project Name	Sexual Assault and Sexual Harassment Policy
Prepared For	PSION Pty Ltd
File Name	Sexual Assault and Sexual Harassment Policy
Version	1.2
Status	Final
Reviewed by	Graham Pontifex – Director Operations
Review Date	31/10/2025
Prepared By	Sarah Savage – Director HR, Operations

Version	Description	Revised By	Date
1.1	Document Creation	Sarah Savage	
1.2	Document Updates	Sarah Savage	31/10/2025

Document Authorisation	
Name	Sarah Savage
Title	Director HR, Operations
Date	31/10/2025
Signature	S.Savage



CONFIDENTIALITY

PSION classifies this document as “Commercial-in-Confidence”.

The information contained in this document is confidential and proprietary to PSION. PSION holds the understanding that this document will be held in strict confidence and will not be disclosed, duplicated or used, in whole or in part, for any purpose other than its written purpose. Please do not alter or use without the prior written consent of PSION.

DISCLAIMER

PSION will not be liable for any losses, damages, costs or expenses arising out of errors in connection with the incorrect usage of this document, please ensure that you are using the latest document before enacting any information contain therein.

It is your responsibility to ensure you have understood the document in its entirety, and that it is the latest publication. In the event of any discrepancies, incomplete information, or unclear instructions, please contact the document owner.

DO NOT act on any information you believe to be misleading. When in doubt, contact your people manager, the document owner, or [Ethics & Compliance \(ECO\)](#). DO NOT misrepresent any information contained inside this document. When in doubt, contact your people manager, or [Team & Culture \(HR\)](#).



1 INTRODUCTION

PSION is committed to providing a safe and respectful working environment for all workers, sub-contractors, and visitors. In particular, PSION is committed to the elimination of sexual harassment and sexual assault (SASH) within the workplace.

At PSION, SASH is not tolerated. All allegations of SASH will be taken seriously and acted on promptly and effectively. Any person found to have sexually harassed or sexually assaulted another person, will face action, up to and including termination of employment or engagement.

No one will be victimised or subjected to any detriment for making a report of SASH.

Any person who is found to have committed an act of victimisation against another person, will face disciplinary action, up to and including termination of employment or engagement.

This policy outlines PSION's management of allegations or incidents of SASH.

2 DEFINITIONS

2.1 SEXUAL HARASSMENT

Sexual harassment is an unwelcome sexual advance, or an unwelcome request for sexual favours, or 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 occur in person or online, can involve one or more incidents and may be physical, verbal, or non-verbal in nature. It extends to work-related activities and events.

2.2 WHAT ARE EXAMPLES OF SEXUAL HARASSMENT?

Unlawful sexual harassment is one form of harassment which the law does not allow. A person sexually harasses another person if:

- The person makes an unwelcome sexual advance, or an unwelcome request for sexual favours, to the person, or

- Engages in other unwelcome conduct of a sexual nature in relation to the person
- In circumstances in which a reasonable person, having regard to all the circumstances, would have anticipated the possibility that the person exposed to the conduct would be offended, humiliated or intimidated.

Unlawful sexual harassment can include but is not limited to:

- Requests for sexual favours, or sexual advances,
- Offensive telephone calls,
- Sending email or text messages which contain sexual content or tone,
- Leering, wolf whistles, obscene gestures, jokes or innuendo,
- Comments or a conversation about a person's sex life or relationships,
- Displays of sexually offensive material, such as emails, posters, pictures, graffiti, screen savers, or text messages,
- Suggestive or sexual jokes, suggestive behaviour, telephone calls of a sexual nature,
- Uninvited touching, hugging, or kissing or other forms of unwanted physical contact, and
- Invading a person's personal space

Mutual attraction between people is not sexual harassment. Conduct which is welcome or consensual is not unlawful, and friendships (sexual or otherwise) which develop between people who meet at work are a private concern provided they do not impact the workplace.

You should take great care before engaging in conduct you believe to be welcome. Always remember that some people may not feel comfortable telling you that your behaviour is offending them and is not welcome. It is your responsibility to ensure that you do not engage in conduct which is not welcome. Similarly, it is your responsibility to tell someone if you do not feel comfortable with their behaviour, or at least raise it with your line manager.

You should also remember that even conduct which is welcome may not be appropriate in the workplace.

2.3 SEXUAL ASSAULT

Sexual assault is any sexual behaviour which is threatening, violent, forced, coercive, or exploitative and in which the victim/impacted person has not given, was unable to give, or has withdrawn consent. Consent is when the person freely



and voluntarily agrees to a sexual activity and they have the freedom and capacity to make that choice. Sexual assault describes a broad range of behaviours including sexual penetration without consent and indecent assault.

2.4 IMPACTED PERSON

An individual who has experienced sexual harassment and/or sexual assault. Anyone can be a victim of SASH, regardless of their sex and the sex of the perpetrator. SASH may also occur between people of the same sex.

2.5 PERPETRATOR

An individual who is accused of perpetrating sexual harassment or sexual assault against another person. This may be a co-worker or manager, or third party such as a client or customer.

2.6 WORKPLACE

Any place where work is carried out for PSION including any place where a worker goes, or is likely to be, while at work. This includes (but is not limited to):

- Client worksites or client offices;
- Psion offices or communal workspaces;
- Work-related social events;
- Online platforms including social media, teams;
- Phone or text messages;
- During work hours, or after-hours; and

2.7 WORKER

Any person who carries out work in any capacity for PSION including work as an employee, a contractor or subcontractor, an employee of a contractor of subcontractor, an employee of a labour hire company who has been assigned to work in PSION, an outworker, an apprentice or trainee, a work experience student or volunteer.

2.8 BYSTANDER

An individual who witnesses sexual harassment and/or sexual assault. A bystander is also someone who is told about an incident. An active bystander or an upstander is someone who takes some form of action to address SASH behaviours when they witness these behaviours. They may step in or speak up to intervene, disrupt or provide support to the person being harmed.



A passive bystander is aware of the behaviour but does nothing to prevent or raise concerns about the behaviour.

2.9 MANAGEMENT OF SASH

Refers to the way PSION actively identifies and responds to risks and reports of SASH. This includes treating all identified risks and reports seriously and managing them promptly and confidentially. It also refers to providing ongoing support for all workers impacted by SASH including impacted people, perpetrators, and bystanders.

2.10 VICTIMISATION

You must not victimise a person because they made or propose to make a complaint of sexual harassment or sexual assault, or because they have provided information in relation to a complaint or disclosure. Victimisation means subjecting a person to some detriment, for example, ostracising an employee.

3 ELIMINATION OF SASH

PSION is committed to eliminating SASH in the workplace. This involves identifying, assessing, and addressing factors that contribute to the risk of SASH, and ensuring a workplace environment and ethos whereby SASH behaviours are not tolerated. PSION requires all workers to undergo SASH training during the induction period and participate in annual SASH training to ensure all awareness of current organisational expectations, policies, and procedures.

4 RISK MANAGEMENT

PSION aims to eliminate or minimise the health and safety risks of SASH in the workplace. The risk management process involves:

- Identifying hazards;
- Assessing risks;
- Implementing measures to eliminate or minimise risks; and
- regularly reviewing control measures to ensure they remain effective.

Risk management will be undertaken by Team & Culture (HR) in consultation with Health and Safety representatives, and workers of all levels. Drawing on the



experience and knowledge of workers is more likely to result in the identification of all hazards and better risk management solutions.

4.1 RISK MANAGEMENT REVIEW

Following a SASH incident, risk management systems will be reviewed by Team & Culture (HR) to identify and address factors that may have facilitated the risk of SASH.

5 REPORTING INCIDENTS OF SASH

Any report of SASH will be treated seriously and from a trauma-informed approach. PSION will handle all reports impartially, and confidentially as far as possible, and will promptly investigate any incidents with appropriate disciplinary action taken where allegations are substantiated.

PSION will provide both internal and external reporting options to allow workers to choose how, when, and to whom they wish to report.

- Internal reporting pathways involve reporting to Team & Culture (HR)
- External reporting pathways are available for workers who may not feel comfortable making an internal report, or who wish to make an external report in addition to their internal report.

WHO CAN REPORT?

Reports can be made by the impacted person, bystanders, or other persons who know of SASH occurring. PSION provides workers the opportunity to share their experience when they feel comfortable and understands it may take time for those involved to process what has happened and feel ready to talk.

PSION also acknowledges that bringing SASH to light is not an impacted person's responsibility. PSION maintains a positive duty to provide a safe workplace free from SASH and other psychosocial hazards which pose risks to the physical and psychological health of workers. Additionally, workers have a duty to take reasonable care to ensure that their behaviour does not adversely affect the health and safety of others.

DO TIME LIMITATIONS APPLY?

PSION does not impose time limits between an incident and reporting. However, if a person wishes to report externally, limitation periods may apply.



ARE THERE REPERCUSSIONS FOR REPORTING?

There will be no repercussions for those who report SASH. As well as being unlawful, repercussions are contrary to PSION's values and policies.

5.1 REPORTING PATHWAYS

SELF-RESOLUTION

At first instance, if a worker feels comfortable doing so, they are encouraged to raise their concerns directly with the perpetrator to ensure they are fully aware that the conduct is unwelcome or inappropriate. This will often resolve the issue quickly and effectively.

There is no expectation for the impacted person to attempt self-resolution if they do not feel safe or confident to do so. If behaviour continues or if the impacted person feels unable to speak to the perpetrator(s) directly, PSION encourages workers to contact a HR Representative, who are trained and responsible for handling SASH reports on behalf of the company.

In the case of sexual assault, the impacted person should go directly to a HR Representative and/or the WA Police and not attempt self-resolution.

INTERNAL PATHWAYS

PSION's HR Representatives are specially trained to receive and respond to reports of SASH. They can:

- Listen to concerns;
- Talk about options;
- Give information about where to get support; and
- Describe how psion can help to resolve the issue.
- Report or escalate serious matters to Team & Culture (HR) for a formal resolution process.

PSION's Team & Culture (HR) is trained to investigate and mediate following a report or a complaint of misconduct including sexual harassment. They will:

- Respond to the report, including formal complaints;
- Investigate complaints;
- Bring involved parties together (if appropriate);
- Conduct mediation; and



- Assist human resources with formal proceedings.

EXTERNAL PATHWAYS

There are a range of external pathways for workers to obtain support and information on SASH. Workers will be supported if they wish to contact:

- The Australian Human Rights Commission
- The WA Equal Opportunity Commission
- The Fair Work Commission
- WA Police 131 444
- **Call 000 if in immediate danger**

Anonymous reporting: workers may submit anonymous reports through WorkSafe.

6 INCIDENT RESPONSE

When a HR Representative receives a report of SASH, they will:

- Record the dates, times, and facts of the incident(s);
- Determine the desired outcome of the impacted person;
- Ensure the impacted person understands the company's procedures for dealing with a report;
- Discuss and agree on either informal or formal resolution procedures, on the understanding that choosing to resolve the matter informally does not preclude the impacted person from pursuing a formal report if they are not satisfied with the outcome;
- Keep confidential records of all discussions and ensure these are stored securely;
- Ensure the impacted person understands they can lodge a report outside of the organisation and that they will be supported if they wish to lodge a report with the Australian Human Rights Commission, the WA Equal Opportunity Commission, the Fair Work Commission, WorkSafe WA, and/or the WA Police; and
- Respect the choice of the impacted person.

6.1 RESOLUTION PROCESSES

- Informal resolution can occur by mediation or conciliation, in which the alleged perpetrator is made aware of the allegations brought against them and is given the right to respond.

- Formal resolution will be followed where:
 - Informal intervention is unable to resolve the issue;
 - The impacted person expresses preference for formal proceedings;
 - The incident(s) of harassment have been severe and/or ongoing; or
 - The report involves sexual assault.

In the case of formal resolution, the designated staff member who initially received the report will refer the matter to Team & Culture (HR) to instigate a formal investigation. The Team & Culture (HR) may deal with the matter themselves, or refer the matter to an external investigator in accordance with this policy.

6.2 CRIMINAL CONDUCT

Some forms of SASH e.g., sexual assault, stalking, indecent exposure and obscene or threatening communications (e.g. phone calls, letters, emails, text messages and posts on social media) may be offences under criminal law and should be reported to the relevant authorities, such as the WA Police.

6.3 MANDATORY WORK HEALTH AND SAFETY REPORTING

SASH that results in a notifiable or reportable injury or illness must be reported to Team & Culture (HR) for a formal record to be filed and an appropriate course of action to be pursued. Failing to report a notifiable or reportable injury or illness incident is an offence.

7 DISCIPLINARY ACTION

Anyone who has been found to have committed SASH against another person under the terms of this policy may be subjected to any of the following:

- Conciliation/mediation conducted by an impartial third party;
- Formal apology and undertaking a commitment that the behaviour will cease immediately;
- Sash training/education;
- Verbal or written warning;
- Adverse performance evaluation;
- Demotion or transfer;
- Suspension, or probation;
- Dismissal (with or without notice)



Where proven, certain serious cases (including but not limited to physical violence, sexual assault, or sexual violence) **will result in the immediate dismissal of the perpetrator, without notice or payment in lieu of notice.**

8 MENTAL HEALTH SUPPORT

PSION have partnered with an Employee Assistance Provider (EAP) to ensure team members needing help receive meaningful support –

WISDOM WELLBEING

- Available to all PSION employees and their immediate family members (spouse/partner, children over the age of 16 in the same household).
- Free 24/7 confidential helpline, with trauma-informed counsellors

In addition to the helpline, Wisdom Wellbeing also provide the following:

- Free formal counselling, in the form of telephone sessions (as applicable)
- Free Online Cognitive Behavioural Therapy (CBT) (as applicable)
- Additional support and self-help via the ‘Wisdom’ App, available in both Google Play and Apple store

Crisis resources are also available to all Australians:

- **Lifeline:** 13 11 14
- **Beyond Blue:** 1300 224 636

The EAP helpline is not an emergency service.

If you – or someone you know – is in immediate danger, call **000** for emergencies.

More details on how PSION can support your mental health are available in our **Mental Health and Mental Health Leave Policy.**



9 IMPLEMENTATION

PSION will ensure this policy is widely disseminated to all workers. All new workers must be trained on the content of this policy as part of their induction into the company.

This policy will be displayed on notice boards, accessible on the company intranet and emailed to all workers at the commencement of employment or engagement and after each update.

It is the responsibility of every people manager to ensure all their workers are aware of this policy.

10 CONTACT INFORMATION

For further information regarding the details contained in this policy, please contact [Team & Culture \(HR\)](#).