

Sexual Harassment and Sex or Gender-Based Harassment Prevention Plan

Prepared under section 55H, Work Health and Safety Regulation 2011 (Qld)

Organisation	Disability & Youth Group Management
Document owner	Human Resources
Approved by	Hayden Brown - Director
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About this plan

This Prevention Plan sets out how Disability and Youth Group Management identifies, assesses and controls the risk of sexual harassment and sex or gender-based harassment at work, and how reports of this conduct are handled. It is a proactive document focused on preventing harm before it occurs, and is separate from the organisation's complaints-handling and disciplinary processes, which are set out in the policies referenced in Section 9.

1. Purpose and Legal Basis

This Prevention Plan has been prepared to meet the duty under section 55H of the Work Health and Safety Regulation 2011 (Qld) (the WHS Regulation), which requires a person conducting a business or undertaking (PCBU) to prepare and implement a written plan to manage identified risks to the health and safety of workers, or other persons, arising from sexual harassment or sex or gender-based harassment at work.

This Plan is also informed by, and intended to operate alongside:

- The Work Health and Safety Act 2011 (Qld) and the general duty to manage psychosocial risks (Part 3.1 and 3.2 of the WHS Regulation)
- The model Code of Practice: Managing psychosocial hazards at work
- The model Code of Practice: Sexual and gender-based harassment
- The positive duty under the Sex Discrimination Act 1984 (Cth) to eliminate, as far as possible, sex discrimination, sexual harassment and harassment on the ground of sex
- The Anti-Discrimination Act 1991 (Qld)
- The Fair Work Act 2009 (Cth), including vicarious liability provisions for workplace sexual harassment
- Relevant sector standards applicable to Gold Coast Disability and Youth including [the NDIS Practice Standards / Child Safe Standards / Human Services Quality Framework, as applicable]

This Plan does not replace these obligations — it documents how the organisation meets its WHS duty specifically in relation to sexual harassment and sex or gender-based harassment risk.

1.1 What this Plan covers

This Plan covers risks to workers and other persons (including clients, visitors, contractors and members of the public) arising from sexual harassment or sex or gender-based harassment connected with work carried out by or for the organisation, whether the conduct occurs:

- In the workplace, during work hours
- Outside normal hours or premises, where connected to work (e.g. work travel, client visits, after-hours support work, work social events)
- Online or via digital communication platforms used for work
- Between workers, or involving clients, families, visitors or other third parties the organisation's workers interact with in the course of their duties

1.2 Definitions

Sexual harassment	An unwelcome sexual advance, unwelcome request for sexual favours, or other unwelcome conduct of a sexual nature, in circumstances where a reasonable person would anticipate the possibility the other person would feel offended, humiliated or intimidated.
Sex or gender-based harassment	Unwelcome conduct of a hostile or derogatory nature, related to a person's sex, gender, gender identity or gender expression, in circumstances where a reasonable person would anticipate the possibility the conduct would offend, humiliate, intimidate, or create a hostile environment.
Psychosocial hazard	Anything that could cause psychological harm (whether or not it could also cause physical harm), including aspects of work design, the working environment, plant, or workplace interactions and behaviours.
PCBU	Person conducting a business or undertaking — in this Plan, refers to Disability and Youth Group Management.
Worker	Includes employees, contractors, subcontractors, labour-hire workers, apprentices, work experience participants and volunteers performing work for the organisation.

2. Scope and Application

This Plan applies to all workers of Disability and Youth Group Management, including employees (permanent, temporary and casual), contractors, volunteers, students on placement, and Board/committee members, and extends to interactions with clients, participants, families, carers, visitors and members of the public encountered in the course of work.

Given the nature of the organisation's work, this Plan gives particular attention to risks arising in:

- One-on-one client or participant support, including in-home and community-based settings
- After-hours, on-call, remote or isolated work
- Shared living, residential, or out-of-home care environments
- Interactions with clients, families or members of the public who may be experiencing distress, trauma, disability, or cognitive or behavioural challenges
- Workplace social functions and informal gatherings

3. Roles and Responsibilities

Role	Responsibility
Director	Overall accountability for this Plan, allocation of resources for its implementation, and oversight of organisational compliance with WHS duties relating to sexual and gender-based harassment.
Human Resources	Day-to-day ownership of this Plan, coordination of risk assessments and consultation, maintenance of the risk register, training delivery, and triennial (or earlier) review.
Key Workers Line Managers	Modelling respectful behaviour, identifying and escalating risks within their teams, supporting workers who raise concerns, and applying control measures in day-to-day operations.
All Workers	Complying with this Plan and related policies, treating colleagues and clients with respect, reporting identified risks or incidents, and participating in consultation and training.

4. Consultation Undertaken

Section 55H(2)(d) of the WHS Regulation requires this Plan to describe the consultation undertaken in its development. The organisation consulted with workers and their representatives as follows:

Method	Participants	Date / Outcome
Head Office Team Consultation	All Workers located at Disability and Youth Group Management Head Office - Nerang	29/06/2026 – email sent to Head Office employees requesting input to identify risk & control for Sexual Harassment and Sex or Gender-Based Harassment Prevention Plan. Option 1: email to arrange a time to meet with HR to input feedback/suggestions. Option 2: email suggestions or feedback directly to HR. Advised that consultations in the development of the plan are confidential, it isn't a one off step and workers will continue to be consulted when this plan is reviewed, when new risks are identified or when control measures are proposed or changed. <i>As of 14/07/2026 – no responses or feedback inputted.</i>

Team Consultation	Frontline Support Workers	15/07/2027 – internal message sent via Slack to the wider organisation with the finalised Sexual Harassment and Sex or Gender-Based Harassment Prevention Plan attached to advise of implementation and welcome feedback/suggestions. Advised that consultations in the development of the plan are confidential, it isn't a one-off step and workers will continue to be consulted when this plan is reviewed, when new risks are identified or when control measures are proposed or changed.
Executive Management Sign Off	Human Resources and Director	01/07/2026 – Sexual Harassment and Sex or Gender-Based Harassment Prevention Plan reviewed and approved by the Director.

Consultation is not a one-off step. Workers and their representatives will continue to be consulted whenever this Plan is reviewed, when new risks are identified, or when control measures are proposed or changed.

5. Identifying the Risk

Sexual harassment and sex or gender-based harassment are treated as psychosocial hazards regardless of whether an incident has previously occurred — the absence of a reported incident does not mean the risk has been eliminated or is being adequately managed. Risk identification draws on multiple sources of information, including:

- Worker consultation, surveys and exit interviews
- Incident, complaint and grievance records
- Workers' compensation and EAP utilisation data (de-identified)
- Observation of workplace interactions, culture and informal behaviour patterns
- Nature of the work itself — e.g. lone work, after-hours work, power imbalances with clients or supervisors, client behaviours of concern
- Workforce demographics and characteristics, including the particular risks faced by women, young workers, LGBTQIA+ workers, culturally and linguistically diverse workers, Aboriginal and Torres Strait Islander workers, and workers with disability
- Reports or concerns raised by clients, families or members of the public

5.1 Intersectional and compounding risk

Sexual and gender-based harassment rarely occurs in isolation. The organisation considers how this risk interacts with other psychosocial hazards — such as high job demands, low job control, remote or isolated work, poor support, and bullying — and how intersecting characteristics (for example, a young worker who is also new to the sector, or a worker with a disability) may increase both the likelihood of harassment and the severity of its impact.

6. Risk Register and Control Measures

The table below records the identified risks of sexual harassment and sex or gender-based harassment relevant to the organisation's work, the control measures implemented or planned, and the matters considered in selecting those controls, consistent with section 55H(2)(b)–(c) of the WHS Regulation.

Identified Risk / Work Activity	Risk Rating	Control Measures (current / planned)	Matters Considered
One-on-one support in a participant's home with no other person present	High	➤ Pre-visit client screening including known behaviours of concern documented in participant behaviour support plans ➤ Mandatory check-in protocol, worker contacts supervisor/coordinator at arrival and departure ➤ Two-worker attendance for visits flagged as elevated risk in the participant's BSP ➤ Clear written guidance on worker rights to disengage from a visit if they feel unsafe ➤ Personal care tasks, training on professional boundaries, right to pause and seek support	➤ Duration and frequency of exposure, workers may visit same participant multiple times per week ➤ No other person present to observe or intervene ➤ Physical intimacy of personal care tasks increases exposure to sexualised conduct ➤ Power imbalance, worker's duty of care may suppress instinct to leave ➤ Participant characteristics, psychosocial disability, ABI, or behaviours of

		➤ Participant sexualised behaviour documented in incident register and triggers review of BSP	concern increase likelihood ➤ Worker characteristics, young or newly qualified workers may not recognise or know how to respond
Workplace social functions	Medium	➤ Alcohol consumption managed — no unlimited alcohol; events held at licensed venues with responsible service ➤ Senior leader or designated responsible person present at all work social events ➤ Code of conduct expectations communicated to all workers before events ➤ Workers reminded of reporting pathways prior to social events ➤ Any conduct concerns at or following social events treated as a workplace matter and addressed under this Plan and the organisation's Code of Conduct	➤ Relaxed social norms at events can lower inhibitions and shift usual professional boundaries ➤ Alcohol consumption increases risk of inappropriate conduct ➤ Incidents at social events are sometimes dismissed as 'not a work matter', this is incorrect in law
Workforce power dynamics — casual workers, young workers, and supervisor relationships	Medium	➤ Casual workers receive the same induction, training, and access to reporting pathways as permanent employees	➤ Casual workers are dependent on supervisors for shift allocation, fear of losing work

		➤ All workers provided with at least two reporting options (not solely the immediate supervisor) to ensure a pathway exists where the supervisor is the subject of a concern ➤ Named harassment contact officer accessible to all workers ➤ Regular supervisor check-in conversations include a standing prompt: 'Is there anything making you feel uncomfortable or unsafe at work?' ➤ Mandatory training for all managers on recognising and responding to disclosures from workers	suppresses reporting ➤ Young workers are less likely to recognise harassment or feel confident in challenging it ➤ Power differentials between supervisors and junior workers create conditions for both harassment and under-reporting ➤ Small team environments mean workers may personally know the person whose conduct concerns them
Online / digital work communication]	Medium	➤ Acceptable Use Policy covering work communications and no personal mobile numbers shared with participants or families ➤ Organisation-provided devices or approved communication platforms (e.g. Teams, dedicated work SIM) for all client-facing contact ➤ Workers informed during induction that they are not required to accept contact from participants or	➤ Informal digital contact blurs professional boundaries and removes organisational oversight ➤ Workers may not recognise escalating contact as a precursor to harassment ➤ Sector norms in small teams can normalise informal communication in ways that increase risk

		families via personal channels ➤ Any sexualised, harassing, or threatening digital contact from a participant, family member, or colleague treated as an incident and reported immediately ➤ After-hours contact norms between workers documented, messaging outside work hours for non-urgent matters discouraged	➤ Contact via personal channels creates evidence chain outside the organisation's incident management system
Night-shift and sleep-over supports in shared accommodation, reduced supervision, physical proximity, and vulnerability on both sides	High	➤ Two-worker rostering for overnights in shared accommodation wherever reasonably practicable ➤ Documented shift handover and behaviour status included at each handover ➤ Lockable worker rest areas in residential settings ➤ Sexualised conduct by participants during overnight shifts treated as a critical incident triggering same-day reporting and supervisor follow-up ➤ Overnight-specific induction covering boundary management and what constitutes reportable conduct ➤ All sleepover incidents reviewed at next team meeting	➤ Reduced oversight during night hours and management not on site ➤ Physical proximity in domestic setting increases risk ➤ Fatigue reduces worker capacity to manage boundary incidents effectively ➤ Workers (especially casual staff) may feel uncertain about reporting incidents from overnight shifts

Sexualised behaviour from young people with trauma histories — acting out as a symptom of their own experiences of abuse or exposure to adult sexual behaviour	High	➤ Trauma-informed practice training for all frontline workers covering sexualised behaviour as a manifestation of prior abuse or exposure to adult sexual conduct ➤ Sexualised behaviour toward workers documented as a critical incident and escalated to supervisor same shift ➤ Behaviour support plans clearly document known sexualised behaviours and approved worker responses ➤ Debrief offered to affected worker within 24 hours; EAP access provided ➤ Case conferencing with relevant parties (case manager, placement coordinator, clinical support) after incidents ➤ Adjusted supervision ratios or co-worker pairing where a young person is known to engage in this behaviour	➤ Young people placed in child safety or youth housing placements often have significant trauma histories including exposure to or experience of sexual abuse ➤ Sexualised behaviour toward workers is foreseeable and documented in sector literature ➤ Workers absorb repeated exposure without formal debrief or recognition, escalates cumulative harm ➤ Particularly affects younger or less experienced workers who may not understand the behaviour in context
Poor Incident Reporting	High	➤ Incident register reviewed monthly by HR, zero reported incidents treated as a potential data quality	➤ Failure to report means risks cannot be assessed, control measures

		issue, not a sign of a safe workplace ➤ Anonymous reporting channel available to all workers (e.g. confidential online form or third-party EAP reporting line) ➤ Workers explicitly told during induction and refresher training: client sexualised behaviour IS reportable conduct, it is not part of the job ➤ After every reported incident, reporting worker receives written acknowledgement within 2 business days confirming the report has been received and what happens next ➤ Aggregate (de-identified) incident trend data shared with all workers and the WHS committee annually ➤ Leaders actively name and challenge informal statements that minimise harassment (e.g. 'that's just how he is', 'don't make a big deal of it') ➤ Exit interview process includes standing question about unreported safety incidents ➤ This Prevention Plan reviewed earlier than the triennial schedule if incident data	cannot be reviewed, and affected workers receive no support ➤ Sector culture in disability and youth services historically normalises boundary-crossing as an unavoidable part of the work, this does not comply with the WHS Regulation ➤ Workers who have previously reported and felt their report was ignored are significantly less likely to report again ➤ Anonymous reporting is particularly important given the small-team environments typical of this sector ➤ Conflation of complaint-handling (HR) and safety reporting (WHS) creates confusion, workers may not know that reporting sexualised conduct from a client is a safety matter, not just a conduct complaint
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		suggests an uptick or persistent under-reporting	➤ Duration and compounding effect, workers who do not report are exposed for longer, increasing severity of harm
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6.1 Hierarchy of controls

Consistent with the model Code of Practice, training and policy statements alone are not treated as sufficient or reliable controls. Where reasonably practicable, the organisation prioritises controls that change the work itself, the workplace layout, or systems of work, before relying on administrative controls such as training:

1. **Eliminate the risk** — where reasonably practicable, redesign the task, role or environment to remove the source of risk entirely.
2. **Substitute or isolate** — e.g. avoid lone work in identified high-risk situations, restrict access, change rostering or pairing arrangements.
3. **Engineering / administrative controls** — e.g. duress alarms, monitored communication channels, supervision structures, reporting systems, codes of conduct, training.
4. **Minimise harm from exposure** — e.g. access to support services, trauma-informed response processes, debriefing.

7. Procedure for Reporting Unsafe Conduct

Section 55H(2)(e) of the WHS Regulation requires this Plan to set out the procedure for dealing with reports of unsafe conduct relating to sexual harassment or sex or gender-based harassment. This Plan focuses on prevention; the organisation's separate Sexual Harassment and Workplace Behaviour Policy sets out the full investigation and disciplinary process referred to in Section 9.

7.1 How a report can be made

- Directly to a supervisor, manager, or Human Resources contact.
- In writing via email or make a time to meet with Human Resource hr@daygm.com.au
- To an external body, including WorkSafe Queensland, the Queensland Human Rights Commission, or the Fair Work Commission, at any time

7.2 How a report will be handled

5. The person receiving the report will acknowledge it promptly and explain the options available, including formal and informal pathways.
6. Immediate safety needs will be addressed first (for example, interim measures to separate parties or adjust duties) before any investigation begins.
7. Where the discloser consents to a formal process, the matter will be investigated under the organisation's Workplace Investigations Policy / Grievance Policy, with procedural fairness afforded to all parties.
8. The discloser will be informed of the outcome of the investigation, to the extent consistent with privacy and procedural fairness obligations.
9. The discloser may have a support person or representative present throughout this process.
10. The discloser retains the right to use existing issue resolution and dispute resolution procedures available under the Work Health and Safety Act 2011 (Qld), and this Plan does not limit that right.

A note on confidentiality and protection from reprisal

Reports will be handled as confidentially as possible, consistent with the need to investigate and address the matter. Workers will not be disadvantaged or victimised for making a report in good faith, and any such treatment will itself be treated as a disciplinary matter.

8. Review of this Plan

This Plan will be reviewed:

- As soon as practicable after a report of sexual harassment or sex or gender-based harassment is made
- As soon as practicable after a request for review from a Health and Safety Representative or Health and Safety Committee
- At least every three years from the date of approval
- Whenever there is a significant change to the work, workplace, or workforce that may affect the risk (e.g. new service type, new premises, restructure)

Each review will involve consultation with workers and their representatives, and will consider whether control measures remain effective, whether new risks have emerged, and whether reported incidents indicate gaps in current controls.

8.1 Review log

Date	Reason for Review	Key Changes Made	Reviewed By
<i>[DD/MM/YYYY]</i>	<i>[e.g. Scheduled triennial review]</i>	<i>[Summary]</i>	<i>[Name, position]</i>

9. Related Policies and Documents

This Plan should be read together with:

- HR-010 - Sexual Harassment and Workplace Behaviour Policy

9.1 Accessibility

This Plan is available to all workers via daygm.com.au and Shiftcare (Document Hub). Workers may request a printed or alternative-format copy from Human Resources.

Document control: this Plan is uncontrolled when printed. Always refer to the version on Shiftcare (Document Hub) or the DAYGM Website for the current version.