

Sexual Harassment Prevention Policy (including sex and gender-based harassment)

1. Policy Statement

Scripture Union Service Limited and all its subsidiaries (hereinafter collectively referred to as SU Australia) are committed to providing safe, inclusive and respectful workplaces, which are free from sexual harassment. As stated in the Conduct and Behaviour Standards, “harassment, sexual misconduct and bullying in any form is completely unacceptable.” Sexual harassment in our workplaces is an unacceptable form of behaviour that will not be tolerated under any circumstances.

SU Australia is committed to proactively managing the risk of sexual harassment and sex and gender-based harassment in our workplaces and eliminating these risks so far as is reasonably practicable. Where risks cannot be eliminated completely, SU Australia aims to minimise risks in accordance with the Sexual Harassment Prevention Plan (refer Appendix A at the end of this Policy).

This policy sets out the responsibilities and obligations of Workers (as defined below) of SU Australia in relation to preventing sexual harassment at SU Australia.

Sexual harassment is made unlawful (at the federal level) in the [Sex Discrimination Act 1984](#), and also in respective state and territory legislation. The [Fair Work Act 2009 \(Cth\)](#) bans sexual harassment associated with work.

2. Purpose

The guiding principles of this policy are to:

- provide a safe working environment for all Workers that is free from sexual harassment and sex and gender-based harassment;
- support diversity and inclusive work practices;
- promote respect amongst all people in the workplace;
- encourage fair and equitable treatment of all people in the workplace;
- ensure Workers have redress against sexual harassment and sex and gender-based harassment in the workplace; and
- inform Workers of their obligations and potential liability in relation to sexual harassment and sex and gender-based harassment.

3. Scope

This policy applies to all Workers.

In this policy, Workers includes all SU Australia Board members, employees, volunteers, contractors or subcontractors, labour-hire employees, outworkers, apprentices, interns, trainees, and work experience students.

4. Roles and definitions

In the context of this Policy, the following definitions apply:

Term	Definition
Line manager	The manager or direct supervisor you report to.
Next manager up	The manager of your own manager or direct supervisor.
Applicant	The Worker who lodges a report of a matter of concern. (Refer Finding Resolution Policy).
Respondent	The person (or persons) who is/are required to respond to the Applicant's report. (Refer Finding Resolution Policy).
Support person	A support person provides emotional support to Applicants or Respondents. A support person is able to attend meetings and interviews but is not allowed to advocate for Applicants or Respondents or contribute to meetings and interviews unless invited to do so by the meeting facilitator or interviewer.
Witness	A witness is someone who directly observed or experienced the matter of concern, or has substantial and factual background knowledge that is relevant to the matter of concern.
Representative	In contrast to a 'support person', a 'representative' is a person that a Worker has authorised (in writing) to represent them in matters of sexual harassment and/or sex and gender-based harassment.
Sexual harassment	Unwelcome conduct of a sexual nature towards another person that could reasonably be expected to make that other person feel offended, humiliated or intimidated.
Sex and gender-based harassment	Sex and gender-based harassment is any unwelcome conduct of a seriously demeaning nature by reason of the person's sex or gender in circumstances in which a reasonable person would have anticipated the possibility that the person harassed would be offended, humiliated or intimidated. (Definition based on the <i>Sex Discrimination Act 1984</i> (Cth).)

5. Activities and times covered by this Policy

This Policy applies at all of SU Australia's workplaces, including any place where a Worker may be considered to be carrying out duties in the course of their association with SU Australia. This may include, but is not limited to, conduct that occurs:

- During regular work hours;
- At work-related events e.g. SU Australia camps and missions, fundraising events, conferences, training events, work-related trips, work-related social events etc;
- Representing SU Australia in the normal course of work e.g. giving a work-related presentation at a church service or other event; and/or
- Outside work hours e.g. unwanted contact outside work hours by phone, email, text or social media; intentional and unwanted visits to a Worker's residence or other places where they are likely to be.

This Policy applies when engaging with other Workers, clients, donors, supporters, external stakeholders (e.g. people in schools or church communities), or members of the public encountered in the course of performing work for SU Australia.

SU Australia recognises that sexual harassment and sex and gender-based harassment can have real and lasting effects on individuals and is committed to taking reasonable and proportionate measures to eliminate such harassment in the workplace so far as is reasonably practicable. Refer to the Sexual Harassment Prevention Plan at Appendix A at the end of this Policy.

6. What is sexual harassment?

Sexual harassment is unwelcome conduct of a sexual nature towards another person, which could reasonably be expected to make that other person feel offended, humiliated or intimidated. A single incident is enough to be considered sexual harassment.

The person engaging in unwelcome behaviour does not have to intend to be sexually harassing the other person for the behaviour to be considered sexual harassment. Sexual harassment is defined by the nature and the impact of the behaviour, not the intention behind it.

A key element of sexual harassment is that it is unwelcome.

It is important to note that if a person does not object to inappropriate behaviour at the time; it should not be assumed that they are giving their consent. Consent exists where clear and unambiguous consent has been freely given and continues to be given.

Sexual harassment may include but is not limited to:

- comments about a person's sex life or physical appearance;
- comments of a sexual nature;
- leering and staring;
- unwanted touching such as brushing up against a person, fondling or hugging;
- 'flashing';
- sexual gestures or imitating a sexual act;
- sexual propositions or repeated unwanted requests for dates;
- making promises or threats in return for sexual favours;
- sexual jokes;
- offensive telephone calls, text messages, emails or other electronic communications;
- displays of offensive photographs, reading matter or objects (including the storage of such material on IT equipment that is the property of SU Australia or elsewhere on property managed by SU Australia. In the case of School Chaplains and REIS Teachers, this includes IT equipment owned by schools or physical school property);
- sending jokes or graphics of a sexual nature by electronic means;
- unwelcome questioning about a person's private life;
- offensive screensavers;
- unwanted requests for sex; and/or
- stalking, sexual assault, indecent assault, or rape (which are also criminal offences).

Sexual harassment can occur in all aspects of employment, such as recruitment, selection, training and promotion processes and discussions around employment conditions and benefits.

Sexual harassment can also occur through electronic means (such as emails or text messages or by viewing pornographic websites) and through social media, regardless of whether the post was made during work hours or not. Where there is a link to the work being performed for SU Australia, Workers are subject to the same rules about sexual harassment in the virtual world as they are in the real world. Refer to the Workplace Bullying Prevention Policy for further details.

Workers are required to use technology and social media responsibly in the workplace and in

relation to anything or anyone associated with the workplace. This extends to the use of technology and social media outside the workplace where there is a strong connection to the employment relationship (for example, between colleagues where the foundation of the relationship is a common workplace). Further information regarding the use of technology is available in the Social Media Policy.

7. What is sex and gender-based harassment?

Sex-based harassment is harassment based on the Worker's assigned sex at birth.

Gender-based harassment is harassment based on the Worker's preferred gender identity.

In addition to the behaviour listed in Section 6 of this Policy as examples of sexual harassment, sex and gender-based harassment may include but is not limited to:

- verbal or physical abuse directed at an individual (directly or indirectly) based on their sex or preferred gender;
- offensive jokes or comments related to an individual's sex or preferred gender;
- displaying offensive or discriminatory material in the workplace related to sex identity or preferred gender identity;
- denying opportunities or promotions to an individual based on their sex or preferred gender;
- gossiping or spreading rumours about an individual's sex or preferred gender; and/or
- excluding someone from social events or other team activities based on their sex or preferred gender.

8. Responsibilities

8.1 SU Australia

SU Australia recognises its legislative obligations to take reasonable and proportionate measures to eliminate sexual harassment and sex and gender-based harassment from its workplaces. SU Australia is committed to:

- ensuring that there are clear processes in place for raising concerns and complaints;
- communicating and promoting these processes amongst employees;
- taking action if SU Australia is made aware of any behaviour which could constitute sexual harassment and sex and gender-based harassment, even if no complaint has been lodged. All Workers can be liable for the actions of others if they authorise, encourage or assist sexual harassment and sex and gender-based harassment to occur in the workplace;
- monitoring the implementation of this policy;
- identifying potential risk factors and taking prompt, reasonable action to mitigate those risks;
- ensuring information and training to support the effective implementation of this policy is accessible; and
- reviewing the policy every two years or earlier as required and communicating any changes or updates to the policy.

8.2 Managers

Managers are responsible for:

- modelling appropriate behaviour;
- monitoring the working environment to ensure, as far as practicable, that acceptable standards of conduct are maintained at all times and that sexual harassment and sex and gender-based harassment is not tolerated;

- promoting awareness of the avenues for advice and the complaints procedures concerning sexual harassment and sex and gender-based harassment as set out in this Policy;
- treating complaints and behaviour which may constitute sexual harassment and sex and gender-based harassment seriously and taking appropriate immediate action;
- treating complaints of sexual harassment and sex and gender-based harassment with appropriate sensitivity and confidentiality;
- explaining to employees that they are legally obligated to escalate disclosures of sexual harassment and sex and gender-based harassment to a more senior manager and/or People Services;
- taking reasonable steps to ensure that a person is not victimised for making, or being involved in, a complaint; and
- ensuring that a complaints process is available and communicated.

Managers of all levels of seniority in SU Australia are responsible for reporting allegations of sexual harassment and sex and gender-based harassment to their relevant Executive leader and the Chief People Services Officer.

Due to the vicarious liability applicable to SU Australia, managers must not refrain from escalating an allegation of sexual harassment and sex and gender-based harassment, even if the employee has asked the manager to keep the matter confidential. The affected employee must be made aware of any escalation being undertaken.

8.3 Managers

All Workers holding management roles of any level are required to:

- comply with this Policy and the SU Australia Conduct and Behaviour Standards document;
- report any incident of sexual harassment and sex and gender-based harassment that they have experienced or witnessed;
- participate in relevant training provided by SU Australia;
- model appropriate behaviour and SU Australia values;
- treat any allegations or complaints of sexual harassment and sex and gender-based harassment with appropriate confidentiality;
- ensure that a person is not victimised for making or being involved in a complaint; and
- understand that managers are legally obligated to escalate disclosures of sexual harassment and sex and gender-based harassment internally to a more senior manager and/or People Services.

8.4 People Services

Members of the People Services team are required to:

- be familiar with this Policy including the procedures for dealing with allegations of sexual harassment and sex and gender-based harassment;
- understand the negative effects that sexual harassment and sex and gender-based harassment can have in the workplace, and the importance of reporting;
- act as a point of contact for a person considering making a complaint or seeking information about sexual harassment and sex and gender-based harassment;
- provide the person with information about the various options and avenues for advice and support;
- provide information about the procedures and avenues for assistance as outlined in the Finding Resolution Policy; and
- participate in any training related to carrying out these responsibilities provided by SU Australia.

9. Criminal offences

Some types of sexual harassment and sex and gender-based harassment may also be unlawful under criminal law. These include indecent exposure, stalking, sexual assault and obscene or threatening communications, such as phone calls, letters, emails, text messages and posts on social networking

sites.

Workers who believe they have been the victim of a criminal offence are encouraged to report the incident to the Police as soon as possible, as well as reporting the matter to their manager or to People Services.

SU Australia may also be required to manage allegations of sexual harassment and sex and gender-based harassment even when the Police are or have been involved. In these circumstances, the Chief People Services Officer will oversee any internal investigation or action as well as any engagement with the Police to ensure the Police investigation is not interfered with or compromised in any way.

10. Reporting or making a complaint

Reports of sexual harassment and sex and gender-based harassment will be managed under the procedures outlined in the Finding Resolution Policy available on the MySU intranet.

Instructions for lodging reports are included in the Finding Resolution Policy. In addition to these instructions, reports of sexual harassment and sex and gender-based harassment may also be made:

- by confidential email (and including appropriate details) to disclose@su.org.au;
- via confidential SMS message to 0436 016 281; and/or
- directly to the Chief Executive Officer (CEO).

For matters of sexual harassment and/or sex and gender-based harassment, affected Workers may choose to authorise another person to represent them (e.g. during meetings and interviews). Workers must authorise their representative in writing and provide a copy of the written authorisation to SU Australia. SU Australia encourages affected Workers who have a representative to still attend any relevant meetings and interviews, provided attendance will not adversely affect the Worker's wellbeing.

SU Australia takes all allegations of sexual harassment and sex and gender-based harassment seriously and complaints will be managed with the utmost discretion and confidentiality. Refer Section 11 Confidentiality below.

Where a complaint of sexual harassment and/or sex and gender-based harassment is found to be substantiated, the consequences for the person against whom the complaint is made will depend on the circumstances and may include termination of employment or engagement with SU Australia.

At any time, Workers may also choose to take a complaint of sexual harassment and sex and gender-based harassment to the following organisations:

- Australian Human Rights Commission (Phone 1300 656 419)
- Fair Work Commission (Phone 1300 799 675)
- Police (for criminal offences)

Under the *Fair Work Act 2009 (Cth)*, a Worker may make an application to the Fair Work Commission (FWC) to deal with a sexual harassment dispute. Without limiting a Worker's rights to make such an application to the FWC (or the Australian Human Rights Commission) should they choose to do so, SU Australia encourages and supports Workers to utilise our internal "Finding Resolution" procedures in a first attempt to resolve matters.

Under the *Workplace Health and Safety Act 2001 (Qld)*, Queensland-based Workers may seek to utilise the dispute resolution process contained in this Act.

10.2 Information or claims without substance

Workers found to have knowingly provided false information or knowingly made allegations of sexual harassment and sex and gender-based harassment without any substantive merit, may be subject to separate disciplinary action.

11. Confidentiality

Disclosures of sexual harassment and sex and gender-based harassment will be treated in confidence to protect a Worker's privacy, with details of the matter restricted to the parties directly involved as defined in this Policy. However, in some instances, a matter may need to be escalated or referred without agreement from the Worker, particularly in circumstances that may:

- constitute a criminal offence;
- constitute a workplace health and safety risk; or
- require disciplinary action.

12. Support, assistance, and further information

SU Australia encourages all Workers to speak to their direct manager, any member of the Executive team, or People Services to discuss any concerns they may have regarding the conduct of another Worker.

13. Relationship to Other Policies

- Finding Resolution Policy
- Workplace Bullying Prevention Policy
- Conduct and Behaviour Standards
- Gender Equality Policy
- Mental Wellness at SU Australia Policy
- Workplace Health and Safety Policy
- Work Health and Safety Committees and Consultation Policy
- Whistleblower Policy & Procedures

Note: This Policy was approved by the SU Executive team in October 2025. This Policy is still to be approved by SU's People, Governance and Risk Committee and the SU Australia Board.

DOCUMENT CONTROL SUMMARY	
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Policy Revision History

Revision date:	Revision No:	Summary description of revision(s) made:	Section(s) changed:	Approved by:
May 2023	1.1	Updated to reflect changes to Fair Work Act 2009 (Cth)	1, 5.2, 7, 10	SU Australia Executive
Oct 2025	2.0	Revised to include sex and gender-based harassment.	All	SU Australia Executive; SU Australia Board

		Revised for the QLD WHS (Sexual harassment) Amendment Regulation 2024		
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APPENDIX A - Sexual Harassment Prevention Plan

1. Identify risks and identify control measures

Refer to Tables 1, 2 and 3 below.

2. Matters considered in determining the control measures

In determining the control measures included in Tables 1,2 and 3 below, SU Australia has considered the following Worker characteristics and demographics:

- Paid employees (from 2024 Workplace Gender Equality reporting):
 - Age (ranging from 14 to 80 years; average age 44.7, median age 45.9) (age data from Jan 2025)
 - Sex (62% women; 38% men)
 - Employment type (17% full-time; 78% part-time; 5% casual).
- Volunteer database (based on 6,059 volunteers at time of writing):
 - Age (ranging from 16 to 83 years; average age 34.7, median age 28)
 - Sex (50% women; 42% men; 8% unknown).

SU Australia prohibits the development of workplace cultures (or subcultures) where unacceptable or inappropriate behaviour is, or may be, permitted. Workplace characteristics and procedures that were considered in determining the control measures include:

- SU Australia's Conduct and Behaviour Standards document that is required to be signed by all paid employees (and a variation required from volunteers);
- Induction and refresher training provided for appropriate workplace behaviour;
- Representation of women at Board level, Executive team level, and National Leadership Team level;
- Small proportion of casual workers (5%), with the potential for a power imbalance with other paid employees.

3. Consultation process

In preparing the Sexual Harassment Prevention Plan, the following Worker consultation activities were undertaken:

- Included as an agenda item for discussion at the two WHS employee consultative committee meetings (Chaplains and SRE Teachers; Office and Field Management) in November 2024;
- Included as an agenda item for discussion at the WHS Governance Committee meeting in December 2024;
- Included as an agenda item for discussion (and subsequent discussion within reporting teams) at the National Leadership Team meeting on 24 July 2025; and
- Consultation meeting conducted with representatives from the Operations department on 8 September 2025.

Further consultation will be undertaken with various Worker groups (including SU volunteers) to continue to define the Risks and Control Measures required in this Sexual Harassment Prevention Plan.

Workplace Gender Equality (including sexual harassment and sex and gender-based harassment) is a standing agenda item for the two biannual WHS employee consultative committee meetings.

4. Dealing with reports of sexual harassment and sex and gender-based harassment

Reports of sexual harassment and sex and gender-based harassment will be managed under the procedures outlined in the Finding Resolution Policy available on the MySU intranet. (Refer Section 10 “Reporting or making a complaint” in this Policy).

Table 1 - School-based Workers (Chaplains and REIS Teachers)

Risks	Control Measures
Inappropriate behaviour from other SU Workers (as defined in this Policy)	• All paid employees are required to sign SU’s “Conduct and Behaviour Standards” upon commencement. This document states that “harassment, sexual misconduct and bullying in any form is completely unacceptable.” • “Respect and Working Together” induction sessions and biennial training sessions for employees. • “New Team Member Orientation” training completed by all volunteers prior to attending their first event includes instructions regarding appropriate behaviour. • ChildSafe training completed every three years by all Workers.. • Training for line managers in their responsibility to escalate issues within SU.
Inappropriate behaviour from non-SU school staff and external contractors in a school setting	• Training to SU employees in lodging reports with their FDM and school line management • FDM accessibility and training in their responsibility to escalate issues within SU. • Relevant training provided by the State/Territory Department of Education (DOE) for its employees. • DOE requirements and expectations of its external contractors. • School line management reporting lines. • DOE reporting procedures.
Inappropriate behaviour from parents and caregivers of students	• Training to SU employees in lodging reports with their FDM and school line management. • FDM accessibility and training in their responsibility to escalate issues within SU.
Inappropriate behaviour from students	• Training to SU employees in lodging reports with their FDM and school line management • FDM accessibility and training in their

	responsibility to escalate issues within SU. • School line management reporting lines. • School and DOE procedures for addressing student behaviour.
School-based Workers working in remote school locations who experience inappropriate behaviour from any person in connection with their work	• Training to SU employees in lodging reports with their FDM and school line management. • FDM accessibility and training in their responsibility to escalate issues within SU. • FDM awareness to act urgently with matters raised by Workers in remote areas and determine the local support available. • Remote Workers are encouraged to seek assistance from local Police to ensure their safety.
Inappropriate behaviour from non-Workers at a SU-related event (eg fundraising event)	• Training to SU employees in lodging reports with their FDM and school line management. • FDM accessibility and training in their responsibility to escalate issues within SU. • Training to Workers in seeking on-the-spot intervention from the senior SU representative leading the event (for events managed by SU).

Table 2 - Workers (any type) in office-based roles and non-school-based field roles

Risks	Control Measures
Inappropriate behaviour from fellow Workers in an office setting	• All paid employees are required to sign SU's "Conduct and Behaviour Standards" upon commencement. This document states that "harassment, sexual misconduct and bullying in any form is completely unacceptable." • "Respect and Working Together" induction sessions and biennial training sessions. • Training for line managers in their responsibility to escalate issues within SU. • ChildSafe training completed every three years by all Workers..
Inappropriate behaviour from fellow Workers outside regular office settings (eg outside working hours)	• <i>See reference to "Conduct and Behaviour Standards" above.</i> • "Respect and Working Together" induction sessions and biennial training sessions.

	• Training for line managers in their responsibility to escalate issues within SU.
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Table 3 - Workers (any type) at SU camps and mission programs

Risks	Control Measures
Inappropriate behaviour from fellow Workers during the camp or mission program (including pre and post program activities)	• “Respect and Working Together” induction sessions and biennial training sessions • Training for line managers in their responsibility to escalate issues within SU
Inappropriate behaviour from parents and caregivers of participants	• Training to Workers in lodging reports with the Camp Director (or other senior SU representative leading the program). • Training for Critical Incident Response Team (CIRT) members to escalate issues within SU. • Post-program incident debrief sessions with relevant senior SU managers that can identify improvements to control measures.
Inappropriate behaviour from participants	• Training to Workers in lodging reports with the Camp Director (or other senior SU representative leading the program). • Contact details for parents and caregivers obtained prior to the event. Contact to be initiated and arrangements made to remove the participant from the program. • Training for Critical Incident Response Team (CIRT) members to escalate issues within SU. • Post-program incident debrief sessions with relevant senior SU managers that can identify improvements to control measures. • ChildSafe training completed every three years by all Workers..