

Sexual harassment prevention plan guide

How to write a prevention plan

Wictorian Equal Opportunity & Human Rights Commission

Published by the Victorian Equal Opportunity and Human Rights Commission. January 2024.

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Disclaimer

This information is intended as a guide only. It is not a substitute for legal advice.

How to write a prevention plan

Drivers	Risks	Responses
The first step to	This step involves	This step involves
preventing sexual	addressing the risk	ensuring responses
harassment involves	factors that enable	to sexual harassment
identifying and	sexual harassment	are appropriate and
addressing the	to occur. It is also	victim-survivor-centric.
drivers. It is also called	called 'secondary	It is also called 'tertiary
'primary prevention'.	prevention'.	prevention'.

This guide outlines primary, secondary and tertiary prevention approach to ensure sexual harassment prevention is comprehensive and best practice.

Step 1. Identify drivers, risks and gaps

- Identify the drivers of sexual harassment.
- Identify the risks specific to the workplace or industry.
- Identify the gaps in responses to sexual harassment.

Step 2. Respond to drivers, risks and gaps

- Consult with employees and employee representatives on actions to address the drivers, risks and gaps, and identify any additional risks.
- Develop these actions and measures into a comprehensive prevention plan.

Step 3. Implement the prevention plan

- Communicate the prevention plan with employees and ensure it's understood by all staff.
- Monitor the success of implementation through regular reviews of reports and complaints data, and any relevant trends.

For more information on prevention plans, take a look at the Commission's Guideline: Preventing and responding to workplace sexual harassment (Guideline).

Download the Guideline at humanrights.vic.gov.au/resources.



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Prevention plan template

Sexual harassment is unwanted conduct of a sexual nature, which could reasonably be expected to make the other person feel offended, humiliated or intimidated.

A sexual harassment prevention plan is just one of the six minimum standards set out in the Guideline which organisations should meet to comply with the positive duty to eliminate sexual harassment in the workplace.

For more information on other standards, see our Guideline – Chapter 4: Complying with the positive duty to eliminate sexual harassment.

This template prevention plan is designed with medium and large organisations in mind and should be adjusted appropriately in accordance with the size, resources and nature of the organisation.

Under the positive duty to eliminate sexual harassment in the workplace, employers must take action that is reasonable and proportionate.

A prevention plan sets out the approach to preventing sexual harassment within an organisation, responding to relevant risks and drivers of sexual harassment, and developing response measures.



Download the template at humanrights.vic.gov.au/resources

Background



- 1. Outline sexual harassment in your workplace.
- What does sexual harassment mean for your workplace?
- Where can it occur?
- What impacts can it have on staff?
- How can sexual harassment be prevented?
- Why are you writing this plan? What will it do?



For information on sexual harassment in the workplace, see our Guideline – Chapter 2: Understanding workplace sexual harassment.



Legal framework

2. Outline the legal framework you are following.

This will be dependent on where your organisation is based.

What are your obligations under state and federal law?

For information on the legal context in Victoria and federally, see our Guideline – Chapter 3: Understanding the law on sexual harassment.

Drivers

3. Outline what the drivers for sexual harassment are in your workplace.

Some drivers include, gender inequality, power disparities in roles, racism, homophobia.

What are the specific drivers in your workplace?

For information on drivers, see our Guideline – Section 2.2: What drives sexual harassment at work?

4. Outline any relevant plans, policies or training you have that address these drivers.

This might be internal strategic plans or strategies for addressing inequality in the workplace.

What are the existing internal strategic plans or strategies for addressing inequality in the workplace?

For information on developing policies and providing education and training, see our Guideline – Standard 1: Knowledge; Standard 2: Prevention plan; and Standard 3: Organisational capacity.



Risks

5. Complete a risk assessment of your workplace and detail results.

This will identify the likelihood of sexual harassment occurring and the potential barriers for individuals reporting it. This may be workplace characteristics such as:

- poorly lit or isolated areas of the office
- short-term contracts with a reliance on reputation or word-of-mouth for securing the next role
- travel and overnight stays.

For a risk assessment template and information on how to complete, see our Guideline – Appendix: Risk assessment tool – Risk matrix.

Response

6. Complete an analysis of any gaps or areas for improvement in your response measures and detail the results.

This may include organisational policies to respond to sexual harassment, reporting pathways, guides for staff and managers and behavioural standards.

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For information on responding to sexual harassment and reporting processes, see our Guideline – Standard 5: Reporting and response.

Consultation

- 7. Outline what your consultation process was.
- How and when did you consult with staff (and staff representatives or unions)? This will depend on the size and type of your organisation.
- What consultation pathways were available? For example, staff workshop, one-on-one, email or a manager survey.
- How were staff suggestions integrated into the prevention plan?

For information on how to consult with staff, see our Guideline – Section 4.2.2: Consult with workers and their representatives.

Actions

8. Identify actions.

These actions should correspond to a particular driver, risk or gap, have a responsible party and timeline, and should be categorised by the type of prevention (driver, risk or response gap).

RESPONDING TO KEY DRIVERS

Key drivers	Proposed action	Responsible party	Timeline
Power disparities between staff	Ensure there are options for anonymous reporting, so staff do not have to report to managers if uncomfortable or inappropriate (i.e. if the manager is the alleged perpetrator)	People and Culture	

RESPONDING TO KEY RISKS

Key risks	Proposed action	Responsible party	Timeline
Isolated areas in the office	Conduct an audit of isolated areas of the office and consider installing further lighting in dark spaces		

RESPONDING TO KEY GAPS

Key response gaps	Proposed action	Responsible party	Timeline
Lack of organisation specific examples	Develop a set of case studies of what reporting sexual harassment might look like through organisational pathways		

Evaluation and ongoing monitoring

9. Outline review process for the plan.

This should include how often this plan will be reviewed and updated and by whom.

The Commission recommends reviews be carried out at least annually.



For information on monitoring and evaluating sexual harassment prevention and response, see our Guideline – Standard 6: Monitoring and evaluation.

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