



Sexual Harassment Prevention and Response Plan

February 2025

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A Safer, More Inclusive GPC Community

At GPC, creating a safe and inclusive workplace is paramount to our values and success. Our Sexual Harassment Prevention and Response Plan supports this by providing robust guidelines, ensuring delivery of comprehensive training, identifying accessible reporting channels, and outlining clear procedures for reporting and responding to issues.

Sexual Harassment and other forms of sexual misconduct or discrimination have no place in any workplace, or in our communities generally. At GPC, we recognise the importance of taking proactive measures to identify and prevent it, call it out, and report it if something does occur. Our plan includes robust guidelines, thorough training, and clear reporting procedures that support and empower our people to speak up and act against any form of harassment they may encounter. By implementing this plan, we are not only fulfilling our legal obligations but also upholding our values of integrity, accountability, and respect and care for each other and our community.

Background

The Respect at Work Bill was passed in parliament in November 2022. This Bill works together with the Sex Discrimination Act and outlines a positive duty for organisations to take proactive and meaningful action to prevent relevant unlawful conduct from occurring in the workplace or in connection to work. This unlawful behaviour includes but is not limited to:

- discrimination on the grounds of sex in a work context
- Sexual Harassment in connection with work
- sex-based harassment in connection with work
- conduct creating a workplace environment that is hostile on the grounds of sex
- related acts of victimisation

This important change requires GPC to shift its focus to actively preventing workplace Sexual Harassment, sex discrimination and other relevant unlawful conduct. The positive duty was a key recommendation of the Commission's landmark ***Respect@Work Report***, led by former Sex Discrimination Commissioner Kate Jenkins AO, published in March 2020.

Our Approach

We are committed to establishing robust Sexual Harassment prevention guidelines and procedures supported by visible leadership, Employee consultation, and ongoing commitment to positive culture transformation. This plan sets out GPC's approach to prevention of and response to sexual misconduct in all our undertakings.

As part of GPC's enterprise-wide approach to psychosocial risk assessment and management, we have identified risk factors for Sexual Harassment specific to GPC's context. These include lack of gender and age diversity in some parts of the organisation, historical variations in standards of acceptable behaviour, and attributes of organisational culture that can inhibit progress towards elimination of misconduct. We are working to address these as root causes of risk and opportunities to improve prevention.

We follow the GPC Health and Safety Communication and Consultation Procedure to ensure Employees are included in risk assessment, identification and implementation of preventative controls, and decision-making. We are also committed to continued and improved provision of support for Employees who have experienced sexual misconduct and further acknowledge that prevention requires long-term culture change.

The goals of this Plan are also aligned with GPC's overarching People Strategy and Diversity, Equity, Inclusion and Belonging (DEIB) Strategy.

Positive Duty to Prevent Sexual Harassment

GPC will address the seven Standards that the Australian Human Rights Commission (AHRC) expects organisations and businesses to meet to satisfy the Positive Duty under the Sex Discrimination Act to prevent, address and respond to incidents. These are set out in the diagram at right.

When implementing the seven Standards, GPC will also consider and apply our own Code of Conduct, Safety, Health & Environment Policy, Health and Safety Communication and Consultation Procedure, Enterprise Risk Management System Manual, Hazard Management Procedure, Incident and Investigation Management Procedure, Equity, Diversity, Discrimination and Harassment Standard (to be reviewed and replaced by a Respectful Workplace Behaviour Standard in 2025) and Prevention of Sexual Harassment and Discrimination Specification.

In this Plan and in GPC governance documents, the term “**Sexual Harassment**” should be understood to mean conduct identified under Commonwealth or Queensland legislation that constitutes sexual harassment, sex- or gender-based harassment, related unlawful discrimination, conduct that creates a workplace environment that is hostile on the basis of sex or gender, or related acts of victimisation or retaliation.

Principles for all GPC People

If you have a concern related to Sexual Harassment, someone discloses a concern to you, or you observe behaviour you believe is wrong, you are encouraged to:

1. **Speak up:** call it out, or safely intervene if you feel confident to do so
2. **Report it:** speak to a HR Representative or your immediate Leader
3. **Seek support:** contact the Employee Assistance Program on 1800 056 076.

HR and EAP are not the only options for reporting or support. If you would like to use other channels (internal or external to GPC), refer to the Prevention of Sexual Harassment and Discrimination Specification.



Figure 1 - Image source: *Guidelines for Complying with the Positive Duty under the Sex Discrimination Act 1984 (Cth)* ([humanrights.gov.au](https://www.humanrights.gov.au))

Action Plan

Purpose

Our Prevention and Response Plan documents GPC's commitment to actions that address the risk of Sexual Harassment and other related unlawful conduct in our workplaces. It provides a map for implementing these actions, which are fundamental to GPC's response to the Respect at Work Bill.

Objectives

1. Promote a culture of safety, inclusion and respect across our organisation.
2. Promote respectful, consensual and safe relationships among our people, customers, and third parties.
3. Support individuals within the organisation who have experienced Sexual Harassment, discrimination or other unlawful conduct, including those whose experiences are unrelated to GPC but may affect their work.
4. Provide clear and transparent guidelines and procedures, including confidential methods of making formal reports of sexual harassment or discrimination.
5. Promote compassionate and trauma-informed first response to disclosures of Sexual Harassment or discrimination and increase awareness and visibility of support services available to our people.

Monitoring and Measuring Success

We acknowledge the importance of robust risk assessment, monitoring and evaluation systems to ensure our goals are achieved and will apply the GPC Enterprise Risk Management System Manual model at right.

We will assess the effectiveness of the Prevention and Response Plan at least every 3 years and in other circumstances required under legislation or regulation. We will also undertake ongoing review and continuous improvement to address evolving needs and changes to obligations.

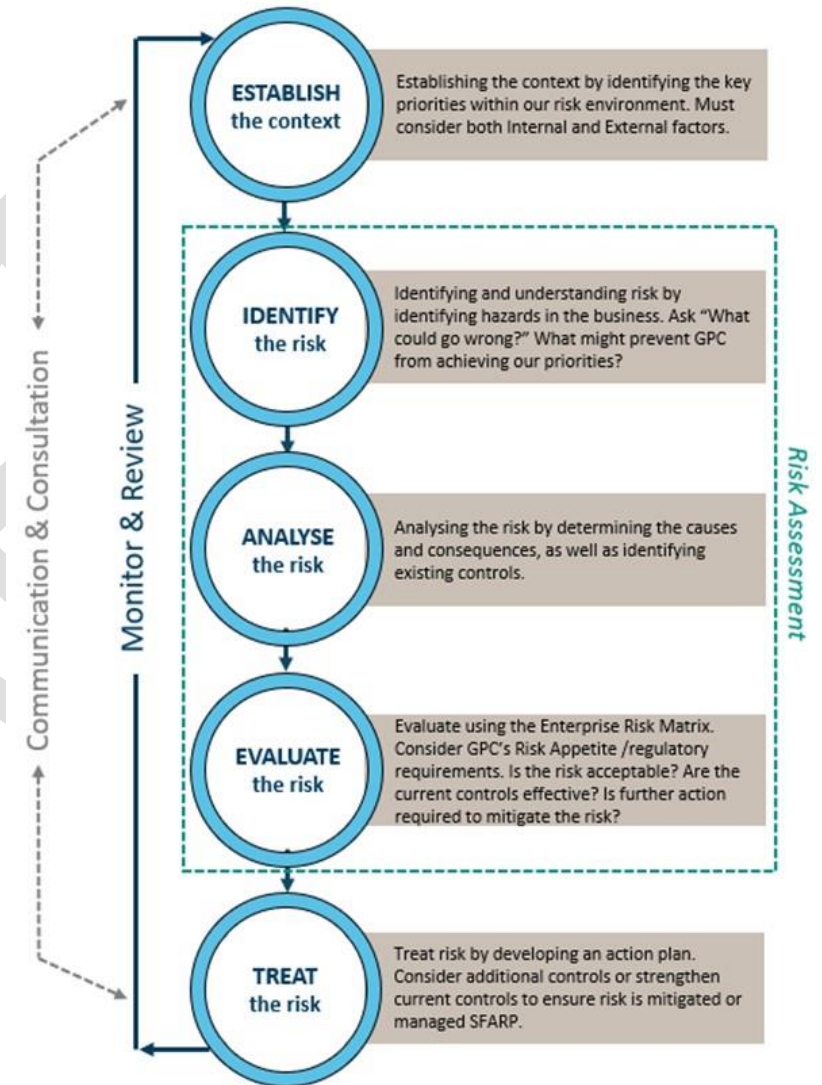


Figure 2 - GPC model from Enterprise Risk Management System Manual

Key Actions

Standard 1: Leadership

Outcome	GPC's Actions
Leaders understand their obligations under the Sex Discrimination Act and have up-to-date knowledge about relevant unlawful conduct.	<ul style="list-style-type: none">• Board and Executive Team undertake specialised training at least every 3 years.• All GPC Leaders are provided with detailed information and undertake annual mandatory training in addition to development activities via regular Leaders' Forums.
Senior leaders ensure that appropriate measures for preventing and responding to relevant unlawful conduct are developed, recorded in writing, communicated to Workers, and implemented. Senior leaders regularly review the effectiveness of these measures and update Workers.	<ul style="list-style-type: none">• Development and consultation of the GPC Prevention and Response Plan and the GPC Prevention of Sexual Harassment and Discrimination Specification.• Regular leadership communication within the GPC Leaders cohort and across all Employee groups.
Senior leaders are visible in their commitment to safe, respectful, and inclusive workplaces that value diversity and gender equality. They set clear expectations and role model respectful behaviour.	<ul style="list-style-type: none">• Development of regularly reporting and analytics for GPC Leaders to build awareness and inspire preventative action, particularly in relation to workforce diversity and equity.• Embed a more robust, structured annual performance and development cycle in which GPC Leaders can reinforce behavioural expectations.• ELT members and other senior GPC Leaders regularly communicate expectations about respectful workplace behaviour, which is reinforced through GPC's strategies, policies, and procedures.

Standard 2: Culture

Outcome	GPC's Actions
Organisations and businesses foster a culture that is safe, respectful, and inclusive, that values diversity and gender equality. This culture empowers Workers (including leaders and managers) to report relevant unlawful conduct, minimises harm, and holds people accountable for their actions.	<ul style="list-style-type: none">• GPC will review our existing policies including Code of Conduct and introduce a Prevention of Sexual Harassment and Discrimination Specification. These documents will be reviewed at least every 2 years to ensure currency and effectiveness.• Expectations of respectful behaviour in the workplace will continue to be communicated through recruitment and onboarding, GPC intranet (Neptune) and email communications, team meetings, and reinforced through company policies.

Standard 3: Knowledge

Outcome	GPC's Actions
Organisations develop, communicate, and implement a policy regarding respectful behaviour and unlawful conduct.	<ul style="list-style-type: none"> GPC has developed a Policy Roadmap to guide review, consultation and implementation of multiple policies, standards, specifications and procedures related to respectful behaviour. During 2025, GPC will update its Code of Conduct Policy and consolidate existing procedures into a more comprehensive Respectful Workplace Behaviour Standard to cover all expectations of behaviour and conduct in a single guide. This Standard will be the 'parent' document for the new Prevention of Sexual Harassment and Discrimination Specification. This Prevention Plan and Response Plan and related governance documents will be regularly featured on our intranet and incorporated in Leaders' Forums and other team meetings.
<p>Organisations support Workers (including leaders and managers) to engage in safe, respectful, inclusive behaviour through education on:</p> <ul style="list-style-type: none"> Expected standards of behaviour including actions and attitudes that foster equality and respect. Identifying behaviours that constitute relevant unlawful conduct and the consequences for engaging in such conduct. Their rights and responsibilities in relation to safe, respectful, and inclusive workplaces and working relationships. <p>This includes their role in preventing and responding to relevant unlawful conduct.</p>	<ul style="list-style-type: none"> In addition to coverage during onboarding, training for all Employees will be implemented and assigned as annual mandatory learning, with Board and ELT members to attend specialised training at least every 3 years. GPC Leaders have received an Information Pack containing critical material on rights, obligations and reporting channels (internal and external). All new Leaders will receive this in onboarding. General resources for all Employees, Contractors, Consultants and Labour Hire Workers will be provided on Neptune including contact information for support services. Behaviour expectations will be reinforced in policies, in particular our Code of Conduct Policy and the new Respectful Workplace Behaviour Standard to be developed in 2025. Other existing collateral includes Code of Conduct and Values posters displayed at sites.

Standard 4: Risk Management

Outcome	GPC's Actions
Organisations recognise that relevant unlawful conduct is an equality risk and a health and safety risk.	<ul style="list-style-type: none"> These risks are explicitly outlined in GPC training materials for Leaders and Employees. GPC will assess the risk of sexual harassment in our workplace using the model espoused by the GPC Enterprise Risk Management System Manual, incorporating Employee consultation. The GPC enterprise psychosocial risk assessment and risk register identifies specific risks and controls related to Sexual Harassment. This risk register will be reviewed regularly by ELT and senior Leaders. Senior leaders are accountable for monitoring risk and creating a workplace culture that supports gender equality, respect, safety, diversity and inclusion.

Standard 5: Support

Outcome	GPC's Actions
Organisations ensure that appropriate support is available to Workers (including leaders and managers) who experience or witness relevant unlawful conduct.	<ul style="list-style-type: none">• Provision of Employee Assistance Program (EAP) through Gryphon Psychology for all Employees, including access to an onsite Psychologist one day per week and increased resourcing during crisis responses.• Information about our EAP and other free internal and external resources can be found on Neptune.• Employees and Leaders also have access to internal HR Specialists, HR Advisors, Safety team members, and Health and Wellbeing team members who can assist with direct support, reporting mechanisms, or referrals. Many of these team members have received Mental Health First Aid training to ensure they are equipped to respond safely, appropriately and sensitively.

Standard 6: Reporting and Response

Outcome	GPC's Actions
Organisations ensure that appropriate options for reporting and responding to relevant unlawful conduct are provided and regularly communicated to workers and other impacted people.	<ul style="list-style-type: none">• The GPC Code of Conduct, People Policy, and Health, Safety and Environment Policy, contain guidelines and references to existing procedures for reporting and responding to safety and conduct concerns through both internal and external pathways.• The Prevention of Sexual Harassment and Discrimination Specification will be developed and implemented in 2025. It will contain more specific procedures for reporting Sexual Harassment and other relevant unlawful conduct and how GPC will manage this.
Responses to reports of relevant unlawful conduct are consistent and timely. They minimise harm to, and victimisation of, people involved. Consequences are consistent and proportionate.	<ul style="list-style-type: none">• GPC's existing policies and procedures for reporting and responding to relevant unlawful conduct, and Delegations of Authority for consistent decision-making on consequences, are available on Neptune and through existing internal communication channels.• The new Prevention of Sexual Harassment and Discrimination Specification will clearly outline procedural steps that further enable a person-centred, trauma-informed response to reports of misconduct, and prioritisation of support for the person or people affected.• The GPC HR team, working in partnership with relevant ELT members, is responsible for ensuring timeliness, consistency and proportionality of responses for relevant unlawful conduct.• Cases are reviewed through deidentified regular reporting and lessons learned exercises.

Standard 7: Monitoring, Evaluation and Transparency

Outcome	GPC's Actions
Organisations and businesses collect appropriate data to understand the nature and extent of relevant unlawful conduct concerning their workforce.	<ul style="list-style-type: none"> The Sexual Harassment Prevention and Response Plan will be reviewed at least every 3 years. Additional review will occur as required by legislation or regulation, or for continuous improvement purposes. The GPC HR team, Safety team and Company Secretary collate all internally reported incidents or complaints related to relevant unlawful conduct depending on the reporting channel chosen.
Organisations and businesses use the data they collect to regularly assess and improve the work culture and develop measures for preventing and responding to relevant unlawful conduct.	<ul style="list-style-type: none"> The HR team maintains a secure, confidential register of instances of unlawful conduct. This data is regularly analysed for trends, deidentified and reported to ELT and Board for review. In addition, selected reporting is available for senior Leaders and the DEIB Action Group – including trends, lessons learned, and recommendations. This data informs ongoing internal audit and review of Leader capability, GPC policies and practices, and outcomes.
Organisations and businesses are transparent about the nature and extent of reported behaviours that could constitute relevant unlawful conduct concerning their workers and actions are taken to address it.	<ul style="list-style-type: none"> Trends, lessons learned, and recommendations will be shared with GPC Leaders as part of ongoing development (such as at Leaders' Forums) for transparency and for continuous improvement.

Related GPC Governance Documents	
Code of Conduct Policy	Code of Conduct Procedure ¹
Safety, Health & Environment Policy	Equity, Diversity, Discrimination and Harassment Standard ¹
Enterprise Risk Management System Manual	Prevention of Sexual Harassment and Discrimination Specification
Health and Safety Communication and Consultation Procedure	Grievance Resolution Management Specification
Hazard Management Procedure	Managing Discipline Specification
Incident and Investigation Management Procedure	

¹ Both to be reviewed and consolidated into a Respectful Workplace Behaviour Standard in 2025