



All companies under the Group - HOBAN Recruitment PTY LTD.
SSB, RED Appointments, Brexa Australia & New Zealand, Clicks
(Australia) Pty Ltd, Index Consultants, RED Appointments NT,
Kinetic Recruitment

Sexual Harassment Prevention Plan

Developed March 2025 - November 2025, Published December 2025



Background

1. Outline sexual harassment in your workplace.

Sexual harassment is unwelcome conduct of a sexual nature that a reasonable person would find offensive, humiliating, or intimidating. It includes, but is not limited to:

- Unwanted touching or physical contact
- Sexual jokes, comments, or innuendo
- Repeated requests for dates or sexual favours
- Display or sharing of sexually explicit images or materials
- Sending inappropriate emails, messages, or social media content
- Behaviour that creates a hostile or uncomfortable work environment.

It can mean that permanent, full-time, part-time, and casual employees On-hire (labour hire) employees placed at host sites, Contractors, consultants, interns, and candidates can be at risk if this prevention plan is not implemented. It can impact all the above-mentioned staffs mental and physical wellbeing, it can impact absenteeism, other incidents and Workcover claims.

It can occur any office or worksite of The Group, in online meetings, at work events, at Host client sites.

It can be prevented by ensuring the Sexual Harassment and Sex or Gender-based Harassment Policy is communicated and enforced, staff are trained, risk assessments are conducted, and risks are eliminated or managed, and by promoting a healthy, respectful workplace culture. All reports of sexual harassment must be addressed consistently and confidentially to hold harassers to account, and responses put the victim-survivor at the centre.

This plan has been developed to educate staff on what sexual harassment is, ensure risks are managed to prevent incidents from occurring, ensure investigations are conducted and outcomes and strategies are regularly reviewed, evaluated and improved.



Legal Framework

2. Outline the legal framework you are following.

This plan complies with the following Australian and New Zealand legislations:

- Sex Discrimination Act 1984 (AUS)
- Fair Work Act 2009 (AUS)
- Work Health and Safety Act 2011 (AUS)
- Human Rights Act 1993 (NZ)
- Crimes Act 1961 (NZ)
- Employment Relations Act 2000 (NZ)
- Health and Safety at Work Act 2015 (HSWA) (NZ)

And Relevant State and Territory anti-discrimination laws:

VIC	Equal Opportunity Act 2010
NSW	Anti-Discrimination Act 1977
SA	Equal Opportunity Act 1984
WA	Equal Opportunity Act 1984
NT	Anti-Discrimination Act 1992
ACT	Discrimination Act 1991
QLD	Anti-Discrimination Act 1991
TAS	Anti-Discrimination Act 1998

The Group and its Host Employers (client's sites) have legal obligations to prevent and respond to sexual harassment involving HOBAN Recruitment Group and Clicks Group staff and all on-hire employees.



Drivers

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

1. Power Imbalances

Employment Vulnerability: On-hired workers often have insecure, casual, or temporary employment. This insecurity makes them less likely to report sexual misconduct due to fear of losing work. Permanent employees may not report sexual misconduct for fear of being performance managed as a result

Supervisory Structures: On-hired workers are frequently supervised by host employers rather than their direct labour hire agency, creating confusion over reporting channels and responsibility. Permanent employees may be working alone and not able to contact their direct manager to report a sexual misconduct

2. Precarious and Insecure Work

Casualisation: Many on-hired workers are employed casually, which limits access to benefits, job security, and a consistent workplace culture.

Fear of Retaliation: Workers may tolerate harassment to maintain income, particularly if they are on short-term contracts or visa dependent.

3. Lack of Clarity in Legal Responsibility for on-hired staff

Confusion of Employer Model: Ambiguity between the responsibilities of host employers and labour hire firms could lead to accountability gaps.

Compliance Avoidance: Host employers could use labour hire to offload responsibility for workplace conduct, including sexual harassment.

4. Regulatory Underreporting

Underreporting: Regulatory bodies often rely on complaints to take action, but many incidents go unreported due to fear or lack of awareness.

Language and comprehension can be a barrier to enforcing the legislation.



Drivers

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

The policies that are active to address these drivers are as follows;

- Sexual Harassment and Sex or Gender-based Harassment policy
- EEO, Anti-discrimination & Harassment Policy

All permanent staff members receive these policies on commencement of employment. Training sessions on this Prevention Plan and the Policies is also provided.

All on-hired staff have access to Sexual Harassment and Sex or Gender-based Harassment policy via companies in the Group websites and in the Induction Handbook which is signed off at the onboarding stage of the recruitment process. Training is provided through WorkPro modules and these need to be completed prior to being offered any placement.

WorkPro is a tech company that develops and delivers online learning modules that cover the most fundamental of safety and compliance information to ensure that workers are aware of their obligations, rights, and responsibilities.



Risks

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

Risk Theme	Identified Risks
1. Work Environment & Conditions	<ul style="list-style-type: none">• Isolated work environments (e.g. night shifts, remote sites, working alone in an office)• Travel and overnight stays• Working with the public (e.g. event staff, train stations, public transport)• Lack of supervision or oversight at client sites• Private numbers calling work mobiles of permanent staff, calls need to be answered
2. Organisational	<ul style="list-style-type: none">• Gender imbalances in varied industry sectors (e.g. construction, warehousing can be more male dominated, childcare and customer service environment can be more female dominated)
3. Host Employer & Client Site Risks	<ul style="list-style-type: none">• Host employers with weak, lacking or non-communicated harassment policies• Inconsistent standards between your company and client sites• On-hired workers being treated as “outsiders” by permanent staff at host sites• Permanent employees having 1:1 meetings with clients at their sites
4. Training & Awareness	<ul style="list-style-type: none">• Inadequate induction or training on respectful workplace behaviour at host sites• Training all staff on the consequences of lodging false reports/allegations
5. Recruitment & Hiring Practices	<ul style="list-style-type: none">• Bias in hiring decisions or interview questions• Discriminatory comments or behaviour during candidate screening• Potential gender insensitive recruitment practices
6. Communication & Technology	<ul style="list-style-type: none">• Inappropriate language in online meetings



Response

6. Complete an analysis of any gaps or areas of improvement in your response processes and procedures and set out the results.

The policies that are active to address these drivers are as follows;

- Sexual Harassment and Sex or Gender-based Harassment policy
- EEO, Anti-discrimination & Harassment Policy

Reports can be made to:

- Your direct manager or supervisor
- Your Recruitment Consultant, Account Manager, Business Manager
- By using the 'Report a Workplace Hazard, Accident, Workplace Bullying or harassment' link on the HOBAN Website: <https://www.hoban.com.au/hoban-on-hire-employees/>
- HOBAN Recruitment Group's EEO and Harassment Officer:
Emily Robertson
Email: emilyr@hoban.com.au | **Phone:** (03) 9203 4904
- RED Appointments EEO and Harassment Officer:
Stephen Hall
Email: stephenh@redappointments.com | **Phone:** (08) 7071 7350
- The Clicks/Index EEO and Harassment Officer:
Naomi Vanderkley
Email: naomi.vanderkley@clicks.com.au | **Phone:** (07) 3027 2559

To investigate, The Group will utilise the Complaint Management Procedure and the Complaint Investigation Report to ensure consistency.

All complaints will be treated confidentially and impartially.

Investigations will follow the principles of natural justice.

Both the complainant and respondent will be informed of the process to manage the complaint.

A guide for staff and managers to use during investigations:

- Managing Harassment or Bullying Complaint Process
- Procedures to be communicated
- Complaint Resolution Procedure



Consultation

7. Outline what your consultation process was.

The prevention plan has been developed through consultation with internal and on-hired staff in the following ways;

- Internal consultation process
- Conducted internal consultation teams meetings of Group Sexual harassment prevention plan with various staff members across the Group businesses, discussed at internal WHS training sessions, 1:1 catch ups, Monthly Business Team Meeting, Quarterly WHS meetings, jobs on meeting

On-hired staff

- WHS Consultation Inbox available to all staff, a message was placed on all staff payslips inviting consultation on the development of this prevention plan. Other consultation processes include Toolbox Talks, Emails, 1:1 discussions

Client sites

- Webinars, WHS Checklist, WHS meetings/Quarterly reviews
- Any identified risk is added to the Group WHS_Risk_Register, these are assessed, and mitigations strategies are implemented

The Group will continue to monitor and consult with stakeholders regarding the above.



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).

Key driver	Proposed action	Responsible party	Timeline
Power Imbalances	<p>Different options for anonymous reporting are available;</p> <ul style="list-style-type: none"> • Reports by permanent staff can be emailed, SMS or verbally advised to direct manager or any other manager • Reports by on-hired staff can be emailed, SMS or verbally advised to the Consultant, Account Manager, Branch Manager, Area Managers • A QR code is available in the Temp handbook • A link is available on the website where a report can be made to the RTW & Safety Manager 	All staff and leaders	Completed
Precarious and Insecure Work	<p>Employment Contracts & Conditions</p> <ul style="list-style-type: none"> • Assignment details clearly outline hours, pay, entitlements and work conditions • Casual conversion pathways to on-hired staff are available in line with the conditions specified in the Fair Work Act <p><u>Transparency & Accountability</u></p> <ul style="list-style-type: none"> • We clearly communicate labour hire arrangements, confirm who the actual employer is and who the host site is • We regularly audit our labour hire and employment practises for compliance in line with the relevant Australian and New 	All staff and leaders	Completed

	<p>Zealand Acts and legislation as defined on page 3 of this document</p> <p><u>Support & Wellbeing</u></p> <ul style="list-style-type: none"> • Provide access to Employee Assistance Programs (EAPs) and wellbeing support. • Promote respectful workplace cultures where all workers feel valued 		
<p>Lack of Clarity in Legal Responsibility</p>	<p>Clear Allocation of Responsibilities</p> <ul style="list-style-type: none"> • Contracts and agreements state the parties responsible for: <ul style="list-style-type: none"> ○ Developing and enforcing anti-harassment policies ○ Providing training and induction <p><u>Investigating complaints</u></p> <ul style="list-style-type: none"> • The Group provides support services (EAP, counselling) • Upholding shared responsibility for host and provider to investigate complaints <p><u>Policy Alignment</u></p> <ul style="list-style-type: none"> • Our Group ensures that we and host employers align workplace policies on sexual harassment • Policies are consistent, accessible, and apply equally to on-hired and permanent engaged staff • The obligations in the Sex Discrimination Act and all state-based legislation, impose a positive duty to eliminate harassment <p><u>Induction & Training</u></p> <p>Inductions cover:</p> <ul style="list-style-type: none"> • What constitutes sexual harassment • Workers’ rights and responsibilities • Reporting channels (who to contact at both the host and labour hire agency) 	<p>All staff and leaders</p>	<p>Completed</p>

	<ul style="list-style-type: none"> Supervisors and managers are trained to recognise, respond, and escalate complaints appropriately <p><u>Clear Reporting Pathways</u></p> <ul style="list-style-type: none"> We ensure workers know they can report harassment Multiple, confidential reporting options are available (e.g., QR code in Temp handbook, link on employer websites, advise all staff of employer and host site contacts) We make sure reporting does not result in victimisation (e.g., reduced shifts, termination) 		
<p>Weak Regulatory Oversight</p>	<p><u>Internal Governance Beyond Compliance</u></p> <ul style="list-style-type: none"> We have established a sexual harassment prevention framework that exceeds regulatory minimums Board-level accountability for workplace respect and safety <p><u>Robust Policies & Procedures</u></p> <ul style="list-style-type: none"> Implemented a comprehensive, stand-alone sexual harassment policy (aligned to Respect@Work guidance) Policies consistently applied across both on-hired and host workplaces Zero-tolerance regarding sexual harassment <p><u>Independent Oversight</u></p> <ul style="list-style-type: none"> We engage third-party investigators where required to review handling of sexual harassment <p><u>Collaboration with Regulators</u></p> <ul style="list-style-type: none"> Notify regulators where required Participate in industry initiatives or codes of practice on workplace respect 	<p>All staff and leaders</p>	<p>Completed</p>

Responding to key risks

Key risk	Proposed action	Responsible party	Timeline
Work Environment & Conditions	<p><u>Safe Physical Work Environment</u></p> <ul style="list-style-type: none"> We ensure adequate lighting, security, and surveillance in high-risk areas (night shifts, isolated sites, accommodation provided by host) Implement buddy systems or check-in protocols for isolated work Design rosters to avoid lone work in vulnerable settings where possible <p><u>Inclusion in Workplace Systems</u></p> <ul style="list-style-type: none"> We ensure on-hired workers are included in host's WHS, HR, and cultural initiatives (e.g., safety committees, respect-at-work programs) We provide equal access to facilities (break rooms, amenities) so they are not marginalised We make sure complaint procedures apply equally to host and on-hired staff 	All staff and leaders	Completed
Organisational Culture & Leadership	<p><u>Respectful Workplace Culture</u></p> <ul style="list-style-type: none"> Require hosts to demonstrate a zero-tolerance approach to sexual harassment before engaging them Promote values-based messaging (respect, dignity) in inductions, signage, and ongoing communication 	All staff and leaders	Completed
Host Employer & Client Site Risks	<p><u>Host Site Assessments</u></p> <ul style="list-style-type: none"> We conduct environmental risk assessments before placing workers (e.g., site layout, shift structures, supervision arrangements) 	All staff and leaders	Completed

	<ul style="list-style-type: none"> We require hosts to demonstrate they have sexual harassment prevention measures in place We audit host workplaces for compliance and follow up on issues 		
Training & Awareness	<p><u>Training & Awareness</u></p> <ul style="list-style-type: none"> We deliver sexual harassment and bystander training to all staff at both the provider and host workplaces We train supervisors to recognise environmental “hotspots” (e.g. night shifts, high-alcohol environments, male-dominated teams) We reinforce expectations during pre-placement briefings for on-hired workers 	All staff and leaders	Completed
Recruitment & Hiring Practices	<p><u>Safe Recruitment Processes</u></p> <ul style="list-style-type: none"> We ensure recruitment interviews are conducted in professional, safe environments We use structured interview questions and panel interviews where possible to reduce power imbalances or sexual bias We provide clear, written codes of conduct for recruiters and account managers <p><u>Fair and Transparent Hiring</u></p> <ul style="list-style-type: none"> We have objective selection criteria based on skills and qualifications, not subjective “fit” Documented hiring decisions to ensure accountability. We avoid discriminatory questions or practices (e.g., about gender, relationship status, appearance) 	All staff and leaders	Completed
Communication & Technology	<p><u>Clear Communication with Permanent and On-hired staff</u></p> <ul style="list-style-type: none"> We provide workers with a clear outline of their rights, including: What sexual harassment is 	All staff and leaders	Completed

- Who to report to (both at the agency and host)
- Available support services
- We ensure workers know that reporting will not affect future placements or shift allocation

Induction & Onboarding

- We include sexual harassment prevention training as part of the induction for on-hired and for permanent staff
- We provide access to harassment and grievance procedures in accessible formats
- Induction covers multiple reporting pathways

Responding to key gaps in response

Key response gap	Proposed action	Responsible party	Timeline



Evaluation and Ongoing Monitoring

9. Outline review process for the plan.

This Prevention Plan will be reviewed and updated post reported incidents or if there are Australian and New Zealand legislation updates.

As a minimum this plan will be reviewed annually.