



Policy 6.12 Workplace Sexual Harassment

Position Statement

Sexual harassment, in all its forms, is an abuse of power. It represents behaviours that are beneath the standards we expect from every one of us and across our Club. It is unethical and against the law.

Sexual harassment takes a psychological, emotional and physical toll and has detrimental consequences on the careers and personal lives of those affected, as well as their families and those close to them.

Sexual harassment in any form is completely at odds with our aspiration to create a safe, respectful and inclusive workplace.

We will act to prevent sexual harassment and provide safe and effective responses for those impacted within, and connected to our Clubs, ensuring well-being, that their wishes are listened to, prioritised and inform the action we take.

This is the commitment of our Board, Management and senior leaders.

It is expected that this is the shared responsibility of everyone who works in our Club – to behave in a way that ensures the safety and well-being of others and is respectful and inclusive. It is also an expectation that, if it is safe to do so, you intervene or report when you see or know of behaviour that may cause offence, distress or harm to others.

We will educate and support everyone connected with our Club on how to prevent, intervene early and respond to offensive behaviour to ensure sexual harassment is eradicated from our work environment.

1.1 Zero Tolerance

At Wanderers Football Club, we have a 'zero tolerance' approach to sexual harassment in the workplace.

By this we mean we will be proactive in eradicating the behaviour – in all its forms. Zero tolerance also means there will be action and consequences that are appropriate and proportionate considering the offender's behaviour and the impact of their actions and taking into account the wishes of the person subjected to the harassment.

It is important to note that zero tolerance does not mean we respond in the same way to every incident, for example, through automatic dismissal.

Often people who report sexual harassment do not wish the offender's employment to be terminated, but want the behaviour to stop, an apology and for it not to happen to anyone else. Just as responses that are too weak can permit sexual harassment to continue, responses that are seen as disproportionately severe can stop people coming forward.



2 Understanding Sexual Harassment

2.1 Drivers of Sexual Harassment

Sexual harassment rarely occurs as an aberration in Clubs or in isolated incidents. The existence of sexual harassment reflects an environment that overlooks or excuses disrespectful behaviour towards others, particularly women and people who do not conform to expected gender roles, such as LGBTIQ+ people.

Although called 'sexual harassment' and referring to behaviour that manifests as conduct of a sexual nature, this behaviour is not about consensual sex and sexual attraction, but rather about unwelcome behaviour that is experienced as offensive, demeaning, humiliating and/or intimidating. In many cases, it is about exerting power and position over others who are perceived to be, or are in fact, more vulnerable. This can even be the case between peers or co-workers.

Sexual harassment is particularly prevalent where gender inequality exists – where Club demographics, values and structures prioritise men and workplace cultures reinforce rigid gendered norms and sexist attitudes

Other factors such as age, gender identity, sexual orientation, Indigeneity, other cultural and linguistic diversity, and disability have also shown to increase the likelihood a person may experience sexual harassment.

2.2 Definition

Although varying in legal definition under different jurisdictions, sexual harassment is generally characterised by behaviour that is unwanted, sexual in nature and reasonably anticipated to offend, humiliate, demean or intimidate.

2.3 Understanding the Context of Sexual Harassment

When it comes to understanding a person's experience of sexual harassment, context is essential. Context is the lens through which a person experiences the behaviour of others. Context filters intent and can amplify impact or give behaviour a different nature.

It explains why a certain behaviour, for example, a kiss or a touch on the back is experienced in one context as 'ok', and 'not ok' in another.

Contextual factors that come into play may include:

- Relationship and power disparity between the parties.
- The history of the relationship.
- Previous patterns of behaviour between the parties (i.e. one-off incident or pattern).
- Tone, verbal and non-verbal cues.
- Position in the Club.
- Employment status, job security and the nature of work.
- Where and when the incident takes place.
- Personal characteristics of age, gender identity, sexual orientation, Indigeneity, other cultural and linguistic diversity, and disability which can make people more subject to sexual harassment.

All of these factors combine to shape a person's experiences of sexual harassment, and in turn can guide responses.

When you overlay context onto a behaviour, such as a kiss, the change of dynamic is clear: a

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kiss hello from a colleague you have a longstanding friendship with; a kiss from a manager along with a salacious 'look' at a work social function; a kiss from a senior leader (who has power over your career progress) in their office after hours – all of these are a 'kiss' but with varying levels of discomfort, offence and impact because of context.

It is therefore important to understand that:

- Sexual harassment can still occur even when the offender does not intend it – innocent or humoured intent, or poor judgement of the offender is irrelevant.
- A lack of objection to behaviour at the time it occurs does not infer that the behaviour is welcome or that it is acceptable for the behaviour to continue at another time.
- There is no requirement that behaviour be repeated – a one-off incident, as well as a pattern of behaviour can both be sexual harassment.
- Consumption of alcohol is not an excuse or extenuating circumstance.
- There are some behaviours that are criminal offences and context is irrelevant.

2.4 Recognising Sexual Harassment

Sexual harassment takes many forms. It can be a one-off incident or a pattern of behaviour. Examples of behaviour that could be considered sexual harassment include:

- Unwelcome comments about looks, dress, hairstyles.
- Repeated and inappropriate invitations to drinks, dinner, non-work-related social events.
- Jokes of a sexual nature or about a person's sexual orientation or gender identity.
- Unwelcome light touch gestures, e.g. an arm around, a kiss hello.
- Degrading comments.
- Sexual objectification of people.
- Repeated requests for dates.
- Personal contact via email or social media that is out of context, out of work hours.
- Ongoing unwelcome contact (e.g. in person, phone, social media) following the end of a consensual relationship.
- Staring or leering.
- Sexually explicit pictures, posters or gifts.
- Whistling, catcalling, honking.
- Intrusive questions or comments about private life, gender identity, sexual orientation, sexual relationships and sexual practices.
- Sexually explicit comments in emails, SMS, phone messages or social media.
- Touching or fiddling with a person's clothing including lifting up skirts or shirts, flicking bra straps, or putting hands in a person's pocket.
- Forced intimacy, e.g. touching, massaging, hugging, cornering or kissing.
- Exposing self.
- Coercing people to look at pornography.
- Requesting intimate images/video of someone.
- Requests or pressure for sex or other sexual acts in exchange for favourable treatment.
- Sharing intimate images/video of someone without consent.
- Stalking, following, watching.
- Actual or attempted sexual assault or rape.



2.5 Where and How Sexual Harassment may occur

Location

Our world of work is expansive. Therefore, so too are the locations and circumstances in which sexual harassment may occur:

- In the workplace, during work hours, including common areas such as lifts, entrances, vehicles, reception areas, corridors, kitchens and toilets.
- Work-related locations including client sites, worksites, public spaces where work is conducted, remote sites, international offices.
- Beyond the usual workplace and outside normal working hours where there is a link to employment such as conferences, social events, business trips, after parties.
- Online via technology and social media, irrespective of whether work resources were used.

Relationships

Our work relationships are extensive which gives rise to the potential for workplace sexual harassment to occur between:

- Employees of the same Club including manager/employee or co-workers.
- An employee and potential employee.
- An employee and someone connected to the Club for work purposes: volunteer, intern, work experience or consultant.

Clients

Clients, contractors, investors, patients, passengers, patrons and supporters are all people of value to our Clubs and offensive behaviour by them towards our employees or towards them by our employees is also unacceptable.

2.6 Personal Relationships

Sexual, romantic or intimate interaction that is entered into freely and reciprocated between consenting employees is not a form of sexual harassment. However, if people behave in sexually inappropriate ways at work, it could still create a sexualised atmosphere that is unwanted by others in the workplace.

Some personal relationships need to be disclosed as they give rise to perceived, potential and/or actual conflicts of interest, for example, where one person has significant influence over the other's opportunities, remuneration and progress; where there is significant power imbalance between parties (i.e. seniority differences); where the relationship is potentially disruptive to team dynamics or has potential reputational implications for the Club.

Full and early disclosure of these relationships to the relevant manager is required so that any implications can be understood, and parties can work together on any action that may be required to resolve any actual or potential conflict.

Sexual harassment may arise in situations where the personal relationship ends and the intimate behaviour of one of the parties is no longer welcome. Support should be sought from the relevant manager or Employee Assistance Program as soon as possible if you are concerned about your behaviour or the behaviour of your ex-partner.



3 Laws and Policies

Behaving in a way that is consistent with our values of safety, respect and inclusion requires more than just compliance with the relevant law, which sets out minimum standards and obligations.

3.1 International Standards

Our position on sexual harassment is aligned with international standards, as set out in several international human rights and labour conventions, which establish obligations to prevent sexual harassment in the world of work, recognising sexual harassment as a form of discrimination, as well as a labour and human rights issue. The International Labour Organization (ILO) convention upholds the right of everyone to a world of work free from violence and harassment, and states that such behaviour can constitute a human rights violation or abuse.

3.2 Applicable Legislation

Sexual harassment is unlawful and prohibited in Australia by both State and Commonwealth legislation. Some of the relevant Federal and State Acts are listed below:

- *Age Discrimination Act 2004 (Cth)*
- *Australian Human Rights Commission Act 1986 (Cth)*
- *Fair Work Act 2009 (Cth)*
- *Racial Discrimination Act 1975 (Cth)*
- *Sex Discrimination Act 1984 (Cth)*
- *Workplace Gender Equality Act 2012 (Cth)*
- *Disability Discrimination Act 1992 (Cth)*

3.3 Employer and Individual Legal Obligations

The laws give rise to potential legal liability for sexual harassment for individuals and our Club.

Individuals may be liable for their own behaviour if they sexually harass another person. In some cases, this may also be criminal conduct.

Observers and other individuals may be liable if they request, instruct, induce, encourage, authorise or assist someone to sexually harass another person.

Employers are also responsible for sexual harassment that occurs in the workplace and may be liable for failing to prevent or properly respond to sexual harassment, which is known as vicarious liability.

This policy provides guidance on how employers and individuals can meet their obligations under that law by prioritising the prevention and early intervention of sexual harassment and contributing to build a workplace that is safe, respectful and inclusive.

3.4 Relevant Club Policies

This policy operates in conjunction with the following Club policies:

- Code of Conduct
- Workplace Health and Safety
- Anti-discrimination policy



4 Everyone has a Role to Play

Everyone has a role to play in preventing and responding to sexual harassment. This is entirely consistent with our existing workplace health and safety obligations to protect each other from harm to our health and safety, including psychological harm.

Without exception, everyone is expected to behave in ways that are safe, respectful and inclusive. People who speak up about or report concerning behaviours they see or know of, make a valuable contribution to the health and safety of our workplace by supporting someone who may be subjected to the behaviour and preventing escalation or repeat behaviour.

There are specific expectations depending on your role:

4.1 Board/Executive

- Ensure sexual harassment prevention and early intervention are a leadership priority and Clubal systems are in place to support this.
- Require regular reporting of frequency and types of incidents, immediate outcomes and long-term implications for parties involved.
- Support external transparency of incidents involving senior leaders and where there is legitimate public or stakeholder interest.
- Prioritise the care and support of those impacted in the Club's approach to resolving the issue.

4.2 Leaders

- Identify, address and educate about behaviour that enables or condones sexual harassment, including tolerance for everyday sexism.
- Speak up when you see, know of or can anticipate the likelihood of sexual harassment.
- Create an environment that encourages teams to feel safe speaking up about or reporting sexual harassment they experience or know of.
- Support an individual who is impacted and understand how they would like the issue managed.
- Prioritise the care and support of those impacted when responding to issues raised with you or observed.
- Report to the Executive and Board on incidents, immediate outcomes and long-term implications for parties involved.
- Speak honestly and confidentially with the impacted team or stakeholders about any incidents or outcomes and reinforce expectations of safe, respectful and inclusive behaviour.
- Keep details of the incident or investigation confidential.

4.3 Teams/Colleagues

- Behave in a way that creates a safe, respectful and inclusive environment and prioritises looking after the safety of others.
- Speak up when you see, know of or can anticipate the likelihood of sexual harassment.
- Intervene in a way that is comfortable for you and if you feel safe to do so, to redirect the conversation or stop the behaviour.
- Ensure the person impacted is safe and check in on them if appropriate.
- Listen to the experience of the person impacted without judgement or preconceived solutions – understand how they would like you to help.
- Participate in any inquiries or investigations about incidents.
- Keep details of the incident or investigation confidential.

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4.4 Human Resources Support Team

- Support the individuals impacted and understand how they would like the issue managed.
- Provide access to EAP, peer or specialist support for all parties.
- Ensure impartial, capable people (internal or external to the Club) are available who can explain concerns about behaviour or support conversations to resolve the issue.
- Investigate the issue or engage an external investigator where appropriate.
- Ensure privacy, confidentiality, due process and natural justice is adhered to throughout.

5 Reporting Sexual Harassment

To help you choose how you wish to report concern about someone's behaviour, we offer multiple options so you can speak with whomever you are most comfortable.

Reports can be made by people directly impacted or others who observe or know of sexual harassment.

You will not be restricted by a time limitation between the incident and reporting the issue to us. We understand that people will share their experience when they feel comfortable and that it may take time to process what has happened and feel ready to talk. Knowing about incidents and issues is helpful for our Club's future efforts to prevent repeat and escalated incidents.

It is important to note that there are time limitations for lodging a complaint with an external body, for example within six months of the incident if you wish the Australian Human Rights Commission to assist.

You will see from the information below, letting the Club know about sexual harassment does not necessarily trigger a formal investigation, although that may be appropriate in some cases. Support, advice and early intervention may resolve the issue and it will also help us understand what is happening in the Club.

There will be no repercussions for those who report issues. Repercussions are unlawful as well as against the values and policies of the Club.

5.1 Managers

You can speak to any member of our leadership team if you are uncomfortable speaking with your own manager in the first instance. Managers can listen to your concerns, talk with you about your options, where you can get support and the different ways the Club could help you to resolve the issue.

Managers can also provide feedback to the person who engaged in the behaviour on your behalf or support you to have a conversation with that person.

There are some circumstances where a manager may need to refer the issue to an external expert advisory team, for example, where the behaviour is serious, creates risk to the psychological and physical safety of others or where it involves a senior member of the Club.



5.2 Executive Management

The Executive can be contacted directly. They can help in various ways depending on your wishes and the circumstances of the issue. They will:

- Listen to your concerns, talk with you about your options, where you can get personal support and the different ways the Club could help you to resolve the issue.
- Provide feedback to the offender on your behalf or support you to have a conversation with that person.
- Initiate a formal process to investigate, where appropriate (using an internal or external investigator), make formal findings and take disciplinary action where appropriate.

5.3 Anonymous Reporting

In some circumstances, you may prefer to tell the Club about the issue without being identified. You can do this by contacting the Executive.

5.4 External Body

You may wish to seek help from an external body or authority who can provide information about your options and in some cases may be able to provide a free, confidential dispute resolution process, which may be legally enforceable. Some Clubs who specialise in independent resolution of sexual harassment include:

- [Australian Human Rights Commission](#)
- [Queensland Human Rights Commission](#)
- [WorkSafe Queensland](#)
- [Fairwork Australia Commission](#)

6 Ways We Can Help

6.1 Resolution Options

There are various ways we can help to resolve the issue depending on your wishes, the context and circumstance.

We know that what most people who experience sexual harassment want the behaviour to stop, to have their experience validated, their Club to know that it happened, and for it not to happen to anyone else. In many cases, all people want from the person who harassed them is an apology.

Wherever possible, we will prioritise early intervention and informal pathways that deliver these types of outcomes.

We will support your wishes to progress from one pathway to another once the process has commenced if you feel that is a more appropriate way for the issue to be resolved, for example, starting out wishing for an investigation and then deciding a more informal process would be preferable.

There are, however, times when the circumstances of the issue mean we must take more formal steps to resolve the issue, such as a formal investigation or referring the matter to the police. Decisions to escalate issues will be made after consideration of the wishes of the person impacted, the seriousness of the behaviour, the context, the seniority of the offender, the impact on the individual, the risk to the psychological and physical safety of others, and the likelihood that the behaviour is also a criminal offence.



6.2 Early Intervention

The objective of early intervention is to let a person know their behaviour is offensive, have the behaviour stop and prevent escalation or repeat behaviour. Responding to issues through early intervention may include:

- Raise it with the person, if you feel safe and comfortable to do so.
- Raise it with an observer, seeking help to speak to the person or intervene either in the moment or if it happens again.

We encourage observers and those who know of potentially offensive behaviour to:

- Intervene in a way that is comfortable for them and if they feel safe to do so, to redirect the conversation or stop the behaviour.
- If safe to do so, separate the offender from the situation, e.g. remove the offender before circumstances escalate.
- Speak up publicly/in the moment to address the comment or behaviour.
- Encourage the offender to reflect on their behaviour, including apologising to the person or people impacted.
- Seek advice or support from your preferred contact, e.g. your manager or your CEO.

6.3 Informal Pathways

The objective of an informal pathway is to provide the offender with the opportunity to stop their behaviour, ensuring they also get a clear message their behaviour is offensive and may constitute sexual harassment. It can provide a safe way for individuals to raise issues about behaviour without being identified. Informal pathways alert the Club about the issue and what it needs to do to prevent escalation or repeat behaviour. Responding to issues through informal pathways may include:

- A manager speaking to the offender about their behaviour.
- Facilitating or mediating an open and respectful conversation between the parties.
- An anonymous report.
- Putting system changes in place to prevent further issues, such as moving or changing the shifts of the offender.
- The Club initiating further reviews to understand any underlying cultural issues and taking preventative action such as education.

6.4 Formal Pathways

The objective of a formal pathway is to initiate fair and confidential inquiries to fully understand the circumstances of a reported issue by impartial, capable internal or external investigators. It protects the person impacted from further harm by ensuring the person is safe and support is in place. The issue is documented, findings are made, proportionate disciplinary action can be taken, and restorative action identified. Responding to issues through informal pathways may include:

- Written statements and interviews about the incident.
- Speaking to witnesses.
- Gathering other relevant evidence.
- Putting the allegations to the person and giving them the opportunity to respond.
- Weighing up all the facts and making a decision about whether the behaviour has breached relevant policies and codes of conduct.
- Ensuring there are proportionate consequences for substantiated sexual harassment.

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6.5 External Pathways

The objective of an external pathway is to provide the individual the choice to have the issues resolved by an independent, expert body that can assist the employer and the parties to reach an outcome or resolution. It is important to note that there are time limitations for lodging a complaint, for example, within six months of the incident if you wish the Australian Human Rights Commission to assist.

Responding to issues through external pathways may include:

- Participating in mediated discussions.
- Parties agreeing to outcomes or resolutions, including compensation.
- Escalating the issues to a formal Court or Tribunal if the matter cannot be resolved by conciliation.
- Findings and determinations are usually made public.

Where the alleged behaviour may be a criminal offence

The most serious sexual harassment may also be considered an offence under Criminal Law. In that instance, it may be appropriate to refer the issue to the police. We will assist you in whatever way we can, such as contacting the police on your behalf or accompanying you to the make the report should you choose to do so.

7 How we will Respond

7.1 Prioritising your Safety and Well-being

If you make a report of sexual harassment, we will ensure you are supported and involved in the decision about how to handle the issue. We will respect your wishes and best interests, but this does not mean they solely decide the Club's response or the consequences for the offender.

Issues raised are taken seriously and viewed with integrity. We may take interim action in the interests of health and safety that is supportive and sensitive to the possibility that the reported behaviour occurred, without making conclusions.

- If you share your experience, we will, to the extent possible, ensure you do not need to retell your story to multiple people.
- Everyone directly impacted by an issue, including those who report and alleged offenders, will have access to trained advocates or referral pathways to external support services.
- All parties involved will be kept well informed and supported throughout the process.
- Investigations will be concluded as quickly as possible while ensuring the approach is ethical over expedient.
- Confidentiality will be maintained.

7.2 Procedural Fairness and Natural Justice

All investigations will be conducted to ensure there is procedural fairness and natural justice, irrespective of your position in the Club. This means:

- Giving someone the opportunity to understand the allegations made against them and to respond.



- Providing appropriate support for individuals involved including the person subjected to the harassment and the alleged offender, such as referral to external support services.
- Facilitating a timely and objective process.
- Substantiating decisions.
- Ensuring outcomes are reasonable and proportionate.
- Maintaining confidentiality throughout.

7.3 Referrals for Support

There are several places where you can get specialist external support including:

- [Employee Assistance Program](#).
- [Lifeline](#) 13 11 14
- Professional supervision - External

8 Possible Outcomes

8.1 Consequences for Offenders

The decision about any outcomes of a sexual harassment investigation will take all the circumstances of the case into consideration including the seriousness of the behaviour, the context, the impact on the individual, the seniority of the offender and relevant industrial instruments.

There are a range of outcomes and implications for a person's employment that our Club might consider once a report of sexual harassment is substantiated. This may include, but will not be limited to:

- Requirement to participate in education or behaviour change coaching.
- Disciplinary action against the person found to have engaged in harassment.
- An apology from the offender (structured with support people).
- Consequences for the position and remuneration of the offender such as demotion; transfer to another location; withholding remuneration increases or bonus payments; removal from sponsorship or high-potential talent or leadership programs; removal of leadership responsibilities.
- Termination of employment.

8.2 Restorative Actions for the Individual Impacted

We will work with you to understand and implement, where possible, any actions that may help you to recover from the incident, rebuild relationships at work and continue a successful career with our Club.

8.3 Club Action

On an ongoing basis, our Club will take steps to identify the potential risk of sexual harassment. After an incident, it may be necessary to undertake a review of a particular work site or environment and implement targeted interventions such as culture surveys and further education.

Transparency of the existence of incidents and sharing de-identified case studies will ensure the Club and its employees continue to build capability in preventing sexual harassment.



8.4 Reprisals and victimisation

If any person is found to have victimised, harassed or taken reprisal action against people who intervene to stop sexual harassment, report sexual harassment or participate in any inquiries or investigations relating to an allegation of sexual harassment, they may be subject to separate disciplinary action.

This includes any action that treats someone adversely, such as ostracising a colleague, reducing their shifts or overtime opportunities, giving them menial jobs, relocating them against their wishes, taking them off key client accounts or key projects, and giving them a poor performance review.

8.5 Information or Claims without Substance

While claims without substance are rare, if any person is found to have knowingly provided false information, knowingly made allegations of sexual harassment without any substantive merit or for vexatious or malicious reasons, they may be subject to separate disciplinary action.

9 Privacy, Confidentiality and Transparency

9.1 Confidentiality and Privacy

The nature of sexual harassment and obligations that our Club has when it is made aware of sexual harassment means that there are limits to what may or may not be disclosed.

Confidentiality in sexual harassment cases means only those who need to know about the issue to help resolve it and prevent further incidents will know the details. This means there may be times when we cannot meet a person's request that the information 'goes no further' than the person they reported the issue to. This is particularly the case, for example, when the issues are serious, involves someone senior in the Club or there are psychological and safety risks to others.

Our Club will prioritise and protect the identity of a person impacted, and anyone else that the investigation reveals has been subjected to harassment. We absolutely preserve the right to keep all details of issues confidential while investigations are underway, including regarding media inquiries.

While the individual subjected to the alleged harassment will sometimes feel frustrated by a workplace investigation process, it is impossible to fairly investigate an allegation if the issues involved are being openly discussed amongst staff and/or the media at the same time.

We will therefore ask and expect people who report issues, to participate in inquiries or are the subject of inquiries about their behaviour to keep all details of the issues confidential until the investigation is concluded. Failure to do so may result in further consequences or disciplinary action.

Once the matter is finalised, we will not restrict the impacted person's right to speak in their personal capacity, with any potential issues arising from this for their own consideration.

9.2 Transparency with External Stakeholders

The following principles set out our approach to communicating about sexual harassment cases particularly where the allegation demands investigation, where the offender or alleged offender is one of our Club's senior leaders and where there is legitimate public or stakeholder interest.



- Our Club will be transparent with internal and external stakeholders about the fact that sexual harassment claims exist.
- The identity of those involved will be protected at all times during the investigation process.
- We will ask everyone involved to keep any workplace investigation process confidential while that process is underway with an exception for receiving expert counselling or support.
- Once any investigation is complete, our Club will not restrict the complainant's right to speak.
- Where there is a legitimate public or stakeholder interest and an investigation has found that allegations are substantiated, our Club may identify the offender.
- Where an investigation has substantiated the allegations, we will be transparent about the outcomes and where an alleged offender leaves our Club.
- If a financial settlement is reached with the complainant, the fact of the settlement will be disclosed by our Club to relevant stakeholders, together with the restrictions it imposes but not the amount.

9.3 Internal Transparency

For everyone to be assured that issues are taken seriously, we are committed to sharing what we can about sexual harassment cases we deal with, while respecting the privacy of the people involved.

This does not mean full disclosure of all the details, but rather considered sharing of relevant information to encourage Clubal learning and prevent similar cases from happening in the future.

10 Reporting and Evaluation

The prevention of and response to sexual harassment is priority at Wanderers Football Club and, consistent with any other core Club metric, is reported to our Board on a regular basis to help inform further action our Club needs to take to eradicate sexual harassment including:

- Number of investigations: open, closed.
- De-identified case studies of serious incidents.
- Average length of investigation to resolution.
- Number of employee days lost, e.g. standdown, stress leave.
- High-level outcomes of investigations.
- Consequences for offenders including value of any settlements.
- Restorative action taken for the individuals impacted.
- Root cause analysis and Club corrective actions.

This policy will be reviewed on an annual basis as part of our ongoing commitment to continuously improve our prevention efforts, create an environment that encourages early intervention on issues by everyone, and respect and support people who may be impacted by sexual harassment.

Related Policies & Documents

5.01 Complaints, Disputes and Appeals

6.06 Bullying and Harassment

5.1.3 Staff Grievance Procedure

Workplace Incident Report

Complaints Form

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