



SEXUAL HARASSMENT POLICY

1. Objective

Woolooware Golf Club is committed to providing a safe and respectful workplace for staff to be free from all forms of discrimination and harassment. All workers are entitled to a workplace free of sex-based misconduct. The Club has a zero-tolerance stance to sexual harassment. It aims to treat every allegation of sexual harassment extremely seriously and will not accept, condone or tolerate workplace harassment of any kind.

Sexual harassment, sex -based harassment and sex-based discrimination are unlawful and the Club acknowledges, observes and complies with the provision of the Sex Discrimination Act 1984 and all other associated State and Federal legislation regarding sex-based misconduct in the workplace.

The objectives of this policy are to:

- Prevent sex-based misconduct from occurring in the workplace,
- Encourage reporting of sex-based misconduct if it occurs in the workplace,
- Ensure all employees, contractors, volunteers and the Club Board of Directors are aware of their rights and obligations if they ever witness or are subject sex-based misconduct in the workplace of Woolooware Golf Club House, Pro Shop and Woolooware Golf Course.
- Ensure that any workers involved in a sex-based misconduct complaint are protected from any form of victimisation.

2. Sex- Based Misconduct in the workplace.

Sex-based misconduct occurs in the workplace when it happens at work or at an event that is connected to work. For example, at work-related events or between colleagues outside of work, which can also include conduct on social media messages sent via text and emails outside of work hours.

Sex-based harassment is any unwelcome conduct of a seriously demeaning nature because of a person's sex, in circumstances which a reasonable person would have anticipated the possibility that the person harassed would be offended, humiliated or intimidated.

The Club recognises that comments and behaviour that do not offend one person can offend another. This policy requires all workers to respect other people's limits. Just because someone does not object to inappropriate behaviour in the workplace at the time, it does not mean that they are consenting to the behaviour.

3. Definition of Sexual Harassment.

Sexual harassment is a specific and serious form of harassment. It happens if a person:

- Makes an unwelcome sexual advance to another person,
- Makes an unwelcome request for sexual favours to another person,
- Engages in other unwelcome conduct of a sexual nature in relation to another person,

In circumstances in which a reasonable person, having regard to all the circumstances, would have anticipated that the person would be offended, humiliated or intimidated.

Sexual harassment does not have to be repeated or ongoing. It can take many different forms and may include physical conduct, verbal or written comments. Some examples of sexual harassment include but are not limited to:

- Comments about a person's private life or the way they look,
- Sexually aggressive behaviour such as leering or staring,
- Brushing up against someone, touching or cuddling,
- Sexually suggestive comments or jokes,
- Sending sexually explicit emails or text messages
- Inappropriate advances on social networking sites,
- Insults or taunts of a sexual nature.

Sexual harassment is **not** behaviour that is based on mutual attraction, friendship or respect.

4. Victimization.

Woolooware Golf club has a zero -tolerance approach to victimisation.

Victimization is against the law and is defined as subjecting or threatening someone to a detriment because they have exercised their rights under equal opportunity law, made a complaint, helped someone else make a complaint, or refused to do something because it would be discrimination, sexual harassment or victimisation.

Victimization is a very serious breach of this policy and is likely to result in formal discipline against the perpetrator, which may include termination of employment or engagement.

5. Responsibilities

Staff:

Woolooware Golf Club requires all staff to behave responsibly by complying with this policy by not engaging in sexual harassment or sex-based misconduct and to immediately report incidents of sexual harassment in the workplace.

Management:

The Club's management have a positive duty to take reasonable and proportionate measures to eliminate workplace sexual harassment, victimisation and sex-based misconduct by:

- Understanding their obligation in accordance with relevant legislation including Sex Discrimination Act 1984,
- Personally demonstrate appropriate behaviour,
- Encourage workers to report any behaviour that breaches this policy,

- Identify and assess risk factors for discrimination, sexual harassment and victimisation,
- Manage and treat complaints seriously in accordance with this policy,
- Provide support to workers who have been subject to or witnesses of sex-based misconduct in the workplace, including referring to an Employee Assistance Provider where appropriate.

6. Procedure

Woolooware Golf Club is committed to providing a supportive environment in which to resolve concerns of sexual harassment.

Informal Resolution Options:

- When an incident of harassment occurs, communicate your disapproval and objections immediately to the harasser and request it stops,
- If the harassment does not stop or if you are not comfortable with addressing the harasser directly, bring your concerns to the attention of the General Manager. The Club will provide advice and support and will undertake any investigations necessary to resolve the matter.

Complaints:

- Any staff member who is the subject of sexual harassment and is not comfortable with the informal resolution options or has exhausted such options may bring the complaint directly to the General Manager. If the complaint involves the General Manager, the staff member may bring the complaint to the Club President or a member of the Club Board of Directors.
- If after an investigation it is determined that an allegation of harassment is valid, appropriate corrective action will be taken.
- Corrective action may include any of the following:
 - (a) Formal apology,
 - (b) Counselling,
 - (c) Written warning placed in the employee's file,
 - (d) Change of work assignment,
 - (e) Suspension or termination of employment.

In addition to the sanction that may be imposed on an employee by the Club as part of the complaint resolution, members of the Club who engage in harassment may expose themselves to:

- **Action in accordance with the Clubs constitution and/ or by-laws**
- **Damages in the event of a successful lawsuit or human rights case.**

7. Confidentiality

The Club understands that it is difficult to come forward with a complaint of sexual harassment and recognises the complainant's interest in keeping the matter confidential.

To protect the interests of the complainant, the person complained against and any others who may report incidents of sexual harassment, confidentiality will be maintained throughout any investigation process to the extent practicable and appropriate under the circumstances. All records of complaints, including contents of meetings, results of investigations and any other relevant material will be kept confidential by the Club.

The Club is committed to ensuring that no person who brings forward a harassment concern is subject to any form of reprisal. Any reprisal action will be viewed as a disciplinable matter.

8. Review of Policy

This policy may be amended or replaced at any time. If necessary, further and actions may be introduced to ensure that sexual harassment misconduct is prevented and controlled.

Adopted by the Club Board of Directors 29th January 2026.

John McMahon

General Manager

Woolooware Golf Club