

The Sexual Harassment Prevention Plan

Jon & Jon Medical Recruitment

Prepared under section 55H, Work Health and Safety Regulation 2011 (Qld), inserted by the Work Health and Safety (Sexual Harassment) Amendment Regulation 2024

1. Why this plan exists

Under section 55H of the Work Health and Safety Regulation 2011 (Qld), a person conducting a business or undertaking (PCBU) must prepare and implement a written prevention plan wherever a risk of sexual harassment or sex/gender-based harassment has been identified in the workplace. This sits within Part 3.2 (Psychosocial Risks) of the Regulation and is separate from, but linked to, our broader Psychosocial Risk Management Plan.

This plan applies to Jon & Jon in its capacity as a labour hire provider, and to the conduct of workers, hosts, host staff, clients, and any other person our workers interact with in the course of work, including at host worksites we do not directly operate.

This document is deliberately written in plain language, so it is accessible and understandable to all workers, consistent with the legislative requirement.

2. Risk identified

As part of our ongoing review of our responsibilities and commitment to safe work we have identified a risk of sexual harassment and sex or gender-based harassment in our business because:

- Our workers are placed at host sites where we have limited day-to-day visibility of workplace culture and supervision
- On-hired workers often have short tenure and less familiarity with site norms, people, and complaint pathways than directly employed staff
- There is an inherent power imbalance: on-hired workers may depend on positive host feedback for future placements, which can discourage reporting
- Some placements involve lone working, night shifts, or community-facing roles with reduced peer visibility
- Workers may be reluctant to raise concerns with the host directly, or unsure whether the host or the Jon & Jon is responsible for acting

3. Matters considered in determining our control measures

In line with the WHS Regulation, the following matters were considered when selecting the control measures below:

- The nature of the workplaces and work performed
- The nature of the relationships between workers, hosts, host staff, clients, and members of the public
- Power imbalances arising from the on-hire relationship, including job insecurity and reliance on ongoing placement
- The duration, frequency, and severity of potential exposure
- Available information from past reports, complaints, exit interviews, and worker consultation
- The extent of control we have over each host site versus the host's own control

4. Consultation undertaken in developing this plan

Consistent with our duty to consult, this plan was developed with input from assessment of host client WHS and controls. This plan will be re-consulted on at each review and whenever a report is received that suggests current controls are inadequate.

5. Control measures

Control	Detail	Responsible	Applies to
Pre-placement briefing	Every worker is briefed on what constitutes sexual/gender-based harassment, how to report it, and that reporting will not affect future placement opportunities	Jon & Jon	All placements
Host vetting	Hosts are assessed for harassment policies, reporting pathways, and past incident history before placement; (Client evaluation forms)	Jon & Jon	Before every new host relationship
Written host agreement	Agreements with hosts specify expectations around worker treatment, reporting obligations, and cooperation with any investigation	Jon & Jon + Host	All host relationships
Independent reporting channel	Workers can report directly to the Jon & Jon without going through the host supervisor	Jon & Jon	All placements
No-detriment assurance	Workers are told that they can report any issues or concern confidentially. Therefore, reporting will not affect future prospects.	Jon & Jon	All placements
Regular welfare check-ins	Scheduled check-ins during placement create a natural opportunity to raise concerns	Jon & Jon	All placements, especially solo/isolated roles
Lone/isolated work review	Additional check-in frequency for workers in solo or isolated placements	Jon & Jon	Identified higher-risk placements
EAP access	All workers are given access to an Employee Assistance Program or equivalent support service	Jon & Jon	All placements

6. Procedure for dealing with reports of unsafe conduct

Reporting and management is run as per WHS and feedback and incident response process

7. Review

This plan is reviewed:

- At least once every 12 months
- After any report is made, to check whether existing controls were adequate
- After any significant change to how we operate (new industries serviced, rapid growth, new host relationships)

Records of each review — what was checked, what changed, and why — are retained as evidence of ongoing compliance.

8. Accessibility

This plan is provided to all workers at induction, kept available on website.