Anglican Diocese of Adelaide

	Preventing and Responding to Sexual Harassment in the Workplace Procedure.		
Related Documents:	Prevention of Sexual Harassment Policy		

1. Purpose

These procedures put into effect the Preventing and Responding to Sexual Harassment Policy v1.0 and are mandatory for all workers, clergy, managers, parish councils and officeholders within the Synod of the Diocese of Adelaide.

They specify:

- Reporting pathways
- Response and investigation steps
- Roles and accountabilities
- Risk assessment and prevention measures
- Privacy, safety and record-keeping requirements

These Procedures must be read together with the Policy.

2. Scope

These Procedures apply to all workers, as defined in the Policy (clergy, employees, volunteers, contractors, officeholders, students on placement).

They apply in all workplaces and any place a worker goes to while undertaking work for the Synod.

3. Principles

Procedures are built upon:

- The Synod's positive duty to proactively prevent sexual harassment as a risk to physical & psychological health.
- Trauma-informed, respectful, timely, confidential handling of disclosures;
- Holding people accountable for unlawful conduct and continuously improving systems.

4. Reporting Pathways

The Policy requires the Secretary of Synod to develop a range of reporting pathways.

4.1. Available reporting options

Any worker may report or disclose sexual harassment via:

a. Professional Standards Director (PSD)
   - Dedicated confidential email and phone line.

b. Secretary of Synod
   - For direct notification, support, or escalation.

c. Line manager, supervisor, rector, or ministry leader
   - Must notify PSD within one business day.

d. Anonymous reporting form

e. External avenues permitted under Policy 4.14:
   - Equal Opportunity SA
   - Australian Human Rights Commission
   - Police for sexual assault (no time limit)

4.2. Immediate safety response

If a disclosure suggests immediate danger, the receiver must:
- Call 000;
- Ensure the person impacted is in a safe location;
- Notify PSD and SoS as soon as practicable.

5. Receiving a Disclosure

5.1. Required response by any worker or leader

Upon receiving a disclosure, the worker must:
- Listen without judgement;
- Acknowledge the experience is taken seriously
- Not promise absolute confidentiality but explain reporting obligations and privacy protections
- Offer available support options, including EAP, pastoral care, a support person and information about the ability to seek independent legal or professional advice at the individual's own expense.
- Escalate immediately to PSD and SoS
- Refrain from making further enquiries and preserve any available evidence

The impacted person's preferences guide the response, but will not override child safety, criminal law, OHS, Professional Standards or serious risk obligations.

5.2. Mandatory escalation

Supervisors/managers/clergy must notify PSD same business day. Any failure to escalate may constitute misconduct.

6. Triage and Initial Assessment (PSD)

Under Policy 6.6 the PSD receives and investigates complaints.
Within 7 business days, PSD must:
- Acknowledge receipt to the person impacted (if known).
- Assess risk: personal safety, workplace safety, other workers' safety, risk of escalation.
- Determine interim measures:
  - Police and/or CARL reporting
  - No-contact directions
  - Modified work arrangements
  - Supervision changes
  - Digital communication restrictions
- Clarify preferred response pathway:
  - Supported informal early resolution;
  - Formal investigation;
  - External reporting.

Documentation: Triage Report stored securely per section 7.

7. Investigation Procedures

7.1. When a formal investigation is required

A formal investigation occurs when:

- The person impacted requests it
- The conduct appears to be a serious breach of Policy;
- Patterns or multiple reports indicate systemic risk.

7.2. Appointment

PSD may conduct the investigation or appoint an external investigator

7.3. Steps

- Statement collected from the impacted person/s and witnesses
- Evidence gathering: emails, images, texts, social media, CCTV (where applicable).
- Procedural fairness:
  - Respondent notified of allegations;
  - Given opportunity to respond;
  - No presumption;
  - Impartial investigator.
- Letter of Allegations sent to respondent
- Response collected from respondent
- Findings: substantiated / not substantiated / unable to determine.
- Outcome recommendations will be provided to the appropriate decision-maker, including the Secretary of Synod, Bishop, Professional Standards Tribunal or other person exercising authority under the applicable Ordinance.

7.4. Timeframes

Target completion: 30–45 business days, recognising trauma-informed flexibility.

8. Support for Respondents

A respondent is entitled to be treated fairly and respectfully throughout the assessment and investigation process.

Upon notification of allegations, the respondent will be informed of available support options, which may include:

- Employee Assistance Program (where available);
- pastoral support;
- an independent support person;
- access to professional counselling at their own expense;
- legal or other professional advice at their own expense.

Any person providing pastoral support to the respondent should, where practicable, be different from any person providing pastoral support to the person impacted.

Support persons must not interfere with or compromise any investigation process

The Professional Standards Director, in consultation with the Secretary of Synod and, where appropriate, the Bishop, will arrange or facilitate pastoral support options for respondents

The Bishop may nominate an appropriate clergy support person for a respondent who is a member of clergy

9. Outcomes and Actions

Once findings are accepted:

9.1. Remedial or protective actions

- Training or education
- Behavioural agreements
- Role restrictions
- Removal from ministry context
- Formal disciplinary action under HR or Professional Standards Ordinance

9.2. Communication

- Person impacted is advised of the outcome (subject to privacy).
- Respondent receives relevant outcome notice.

9.3. External referrals

Where there is suspicion of criminal conduct, child protection risk, or serious indictable offence:

- Mandatory report to Police or relevant statutory body.

10. Review of Decisions

A person impacted or respondent may request a review of a decision arising from these Procedures.

A request for review must:

- be submitted in writing within 14 days of notification of the decision; and
- identify the grounds of review.

10.1. Grounds of review

A review may be requested on one or more of the following grounds:

- significant procedural error;
- relevant new information that was not reasonably available during the investigation;
- the decision was unreasonable having regard to the available evidence;
- actual or perceived conflict of interest affecting the investigation or decision-making process.

10.2. Conduct of review

The review will ordinarily be conducted by a person independent of the original investigation and decision-making process.

- The reviewer may:
- affirm the decision;
- vary the decision;
- remit the matter for further investigation; or
- recommend another appropriate course of action.

11. Prevention and Training Procedures

11.1. As required under the Policy, the Secretary of Synod must implement training to ensure all workers understand:

- What constitutes sexual harassment.
- Bystander responsibilities.

- Reporting pathways.
- Responding to disclosures.

11.2. Training schedule

- Mandatory induction for all workers within first 6 months.
- Annual refresher for all workers, clergy, parish councils.
- Specialist training for managers, clergy, and investigators.

12. Parish Council Obligations — Procedural Requirements

The policy mandates Parish Councils to take positive steps to prevent sexual harassment.

Parish Councils must:

- Keep sexual harassment prevention as a standing WHS agenda item.
- Ensure all parish workers and volunteers undertake required training.
- Conduct annual parish-level risk assessment.
- Confirm awareness of reporting pathways.
- Display approved reporting posters and Code of Conduct.

Minutes must reflect completion of these actions.

13. Records, Privacy and Confidentiality

13.1. Confidentiality obligations

As required by Policy 7.1–7.3:

- All information is confidential;
- Identities and details protected;
- Breach may lead to disciplinary action.

13.2. Records management

The PSD maintains:

- Secure complaint register;
- Investigation files;
- Outcome logs (de-identified).

13.3. De-identified reporting

Reports to SoS → DRAC → DC must be de-identified.

14. Independent Advice and Representation

Persons impacted, respondents and witnesses may obtain independent legal, industrial, professional or other advice at their own expense at any stage of the process.

A person may also be accompanied by a support person during interviews or meetings, subject to reasonable procedural requirements.

The involvement of a legal representative does not alter the Diocese's obligation to conduct a fair, timely and trauma-informed process.

Legal representatives and support persons must maintain confidentiality and must not interfere with the investigation process or the participation of other parties

15. Time Limits and Late Complaints

As per Policy section 5:

- Reports must ordinarily be made within 12 months of conduct.
- Late complaints may be accepted if good reason and fairness justify consideration.
- Sexual assault reports have no time limit.
- Matters that have previously been investigated and determined will not ordinarily be re-opened unless:
    - significant new evidence becomes available;
    - there is evidence of material procedural unfairness; or
    - there are exceptional circumstances warranting reconsideration.

16. Continuous Improvement

This follows Policy 4.6 and 4.13 and calls for:

- Annual review of case data, systemic drivers, and training gaps.
- Improvements fed into training and Procedures.
- Recommend amendments to DC as needed.

17. Review of Procedures

These Procedures are reviewed annually by the Secretary of Synod, Diocesan Risk and Audit Committee and Diocesan Council.

Appendices

A. Disclosure Form
B. Intake/Triage Form
C. Terms of Reference Template
D. Investigation Report Template
E. Parish Council WHS Standing Item Template
F. Training Log Template

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APPENDIX A — DISCLOSURE FORM (For Workers, Clergy, Volunteers)

CONFIDENTIAL — TO BE PROVIDED TO THE PROFESSIONAL STANDARDS DIRECTOR (PSD)

1. Your Details

(You may report anonymously, but providing your details enables support and follow-up.)

- Name:
- Role / Parish / Ministry Area:
- Preferred contact method (phone/email):
- Safe times to contact you:

2. Are you reporting:

- ☐ Something that happened **to you**
- ☐ Something you **witnessed**
- ☐ Something you **were told** by another person
- ☐ Something that happened to a **child**

3. Details of the behaviour

(What happened? When did it happen? Where? Who was involved or present?)

- Date(s):
- Location(s):
- Description of behaviour (use your own words):

4. Parties involved

- Person(s) whose behaviour is of concern:
- Witnesses (if any):

5. Safety concerns

- Are you currently safe? YES / NO
- Is anyone else at immediate risk? YES / NO
  (If "NO", PSD or supervisor must ensure safety actions are put in place. See Policy 4.9–4.12.)

6. Support requested

- ☐ EAP
- ☐ Pastoral support
- ☐ Support person
- ☐ Other:

7. What outcome or next step would you prefer?

(Policy 4.10–4.12 emphasises that the response should be guided by the person impacted unless there is immediate risk.)

- ☐ Information only
- ☐ Informal resolution
- ☐ Formal investigation
- ☐ External report (EO SA, AHRC, Police)

- ☐ Unsure — please discuss options with me

8. Signature (optional):

Date:

OFFICE USE — PSD ONLY

- Date received:
- Intake officer:
- Immediate actions taken:
- File reference:

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APPENDIX B — INTAKE & TRIAGE FORM (For PSD / Secretary of Synod)

CONFIDENTIAL — Restricted to PSD & Secretary of Synod
(Required due to Policy 7.1–7.4 privacy obligations)

1. Intake Information

- Date received:
- Received by (PSD / Manager / Clergy / Other):
- Method (verbal, written, anonymous):
- Summary of report:

2. Immediate Safety Assessment (within 2 business days)
(Policy 4.9–4.12)

- Any immediate danger? YES / NO
- Police contacted? YES / NO
- Department for Child Protection contacted? YES / NO
- Interim controls required?
    - ☐ No-contact direction
    - ☐ Modified duties / rostering
    - ☐ Change of supervision
    - ☐ ICT / communication restrictions
    - ☐ Safe-meeting protocols
    - ☐ Other:

3. Person Impacted – Preferences
(Policy 4.10–4.12)
Preferred response pathway:

- ☐ No action yet
- ☐ Informal facilitated response
- ☐ Formal investigation
- ☐ External pathway (AHRC / EO SA / Police)

4. Case Categorisation

- ☐ Potential breach of Sexual Harassment Policy
- ☐ Potential misconduct (Professional Standards Ordinance)
- ☐ Criminal conduct suspected (notify per Policy 7.4)
- ☐ Systemic concern (multiple reports)

5. Triage Outcome

- Case allocated to:
- Target completion date:
- Notification provided to SoS: YES / NO

6. Documentation

- All materials uploaded to secure PSD repository: YES / NO

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APPENDIX C — TERMS OF REFERENCE (TOR) TEMPLATE FOR FORMAL INVESTIGATIONS

FORMAL INVESTIGATION — TERMS OF REFERENCE
(Issued by PSD per Policy 6.6.1–6.6.4)

1. Parties

- Complainant / Person Impacted:
- Respondent(s):
- Investigator (internal / external):

2. Purpose of Investigation

To determine whether conduct reported on [date] constitutes a breach of the **Sexual Harassment Policy v1.0**, including:

- unwelcome conduct of a sexual nature;
- whether a reasonable person would anticipate the behaviour to offend/humiliate/intimidate (Policy section 3).

3. Scope of Investigation

The investigation will consider:

- Allegations listed below;
- Relevant events, behaviours, communications;
- Interviews with involved parties and witnesses;
- Any physical, electronic, or documentary evidence.

4. Out-of-Scope Matters

- Historical allegations already formally resolved;
- Unrelated interpersonal conflict;
- Doctrinal or theological disputes.

5. Allegations to be Determined

(Insert each allegation clearly and separately.)

6. Procedural Fairness Requirements

Consistent with Policy 4.12:

- Respondent notified of allegations;
- Opportunity to respond in writing and/or interview;
- Investigator impartial;
- Evidence-based findings.

7. Confidentiality

All parties must maintain confidentiality under Policy 7.1–7.3.

8. Standard of Proof

Balance of probabilities.

9. Timelines

- Target: **30–45 business days**
- Extensions must be approved by PSD.

10. Deliverables

- Investigation report: findings for each allegation; analysis; evidence summary; recommendations.

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APPENDIX D — INVESTIGATION REPORT TEMPLATE

CONFIDENTIAL INVESTIGATION REPORT
(Prepared for PSD & Secretary of Synod)

1. Executive Summary

- Complainant:
- Respondent:
- Summary of allegations:
- Conclusion (substantiated / not substantiated / partially / unable to determine).

2. Methodology

- Interviews conducted;
- Documents reviewed;
- Trauma-informed adjustments (if any);
- Limits of investigation.

3. Evidence Summary

For each allegation:

- Factual findings;
- Evidence relied on (documents, statements, recordings, messages, etc.).

4. Findings

Apply the definition and criteria from Policy section 3 (unwelcome, sexual nature, reasonable person test).

5. Policy Breaches

- Identify breaches of Sexual Harassment Policy;
- Identify any related breaches (Code of Conduct, WHS obligations, Professional Standards Ordinance).

6. Recommendations

Provide recommended actions:

- Training;
- Mediation (if appropriate and safe);
- Role restrictions;
- Disciplinary action;
- Referral to external bodies (Policy 7.4).

7. Appendices

- Evidence tables;
- Interview notes;
- Documents/information relied upon.

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APPENDIX E — PARISH COUNCIL WHS STANDING ITEM TEMPLATE (Sexual Harassment Prevention)

PARISH COUNCIL AGENDA — STANDING ITEM
"Sexual Harassment Prevention and WHS Compliance"
(Required under Policy 6.5.3 — Parish Councils must regularly consider prevention of sexual harassment as part of WHS.)

1. Training Compliance
- % volunteers/workers who have completed mandatory training
- Outstanding training follow-up actions

2. Risk Assessment Updates
- Any new hazards identified (events, camps, online ministry, pastoral visits)
- Controls implemented / needed

3. Reporting Pathways Promotion
- Posters visible?
- Parish website updated?
- Volunteers aware?

4. Incident/Disclosure Summary (De-identified)
- Any disclosures received?
- Actions taken?
- Lessons learned?

5. Resource or Support Needs
- Do we require further guidance from the Secretary of Synod?

6. Resolutions / Actions
- Actions agreed
- Responsible person(s)
- Due dates

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APPENDIX F — TRAINING LOG TEMPLATE (For Parishes, Ministry Units, Synod Office)

TRAINING LOG — Sexual Harassment Prevention
(Required under Policy 6.3.5–6.3.7 and 6.7.2)

Name	Role	Parish / Unit	Induction completed?	Annual refresher completed?	Bystander training completed?	Manager/Clergy specialised training?	Notes / Follow-up
			☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	

Instructions:

- Retain training logs for **5 years**;
- Submit annually to Secretary of Synod for diocesan compliance reporting