

INTOWORK AUSTRALIA WORKPLACE ANTI-BULLYING AND HARASSMENT POLICY

IntoWork Australia and its Group of businesses (IntoWork) has a legal and moral responsibility to ensure that employees and, those affected by its operations and activities, are not subjected to behaviours or practices that may be constituted as workplace bullying or harassment.

This policy applies to people who are employed or engaged with IntoWork, in any one of the following capacities:

- as a paid employee (including internally hosted trainees and labour hire staff);
- as a self-employed person engaged as an independent contractor;
- as a volunteer (including work experience placements);
- as a director;
- as a student using the Group's training facilities.

The Anti-Bullying and Harassment Policy underpins the IntoWork's commitment to respecting and promoting human rights by setting an expectation of professional, responsible and respectful behaviour to ensure a productive workplace and learning environment.

The objective of this policy is to provide equitable, safe and healthy workplaces across the IntoWork which are free from workplace bullying and harassment. IntoWork recognises that the coverage of health and safety legislation applies to workplace harassment and bullying. Unlawful conduct, including but not limited to workplace harassment and bullying will not be tolerated.

Workplace bullying is defined as repeated and unreasonable behaviour directed towards a worker, or group of workers, that creates a risk to health and safety. Unreasonable behaviour means behaviour that a reasonable person, having considered the circumstances, would see as unreasonable including behaviour that is victimizing, humiliating, intimidating or threatening.

Harassment is any unwanted or unwelcomed behaviour which makes a person feel offended, humiliated or intimidated. Harassment can take many different forms – it can be obvious or indirect, physical or verbal, repeated or one-off. Unlike bullying, harassment does not have to be repeated. It is acknowledged that harassment and bullying are a risk to the physical and mental health of our employees and other people.

Bullying and harassment may include, but are not limited to, such behaviours as threats; verbal abuse and offensive language; physical violence and abuse; sexual harassment or unwelcome sexual advances; exposure to offensive material; being given meaningless or impossible tasks to do; excluding or isolating employees including withholding information needed for effective work performance; intimidation and being humiliated by such actions as hurtful teasing, jokes, or practical jokes.

Management is responsible for giving direction on work tasks and how work is carried out, including monitoring an employee's performance. Such actions are not considered to be workplace bullying if they are carried out lawfully and in a reasonable manner, taking the particular circumstances into account.

IntoWork strongly encourages the reporting of incidents of workplace bullying and harassment as a means of identifying and eliminating this behaviour from our work and learning environment. It is the policy of IntoWork to minimise the risk of workplace bullying and harassment by adopting a systematic approach to managing the hazard including:

1. Providing initial and regular information and training regarding workplace bullying and harassment, reporting procedures and the Group policy to all employees
2. Promoting employee awareness of the right to work in a supportive and mutually respectful workplace free from inappropriate behaviour
3. Promoting awareness of an employee's right a right to make a complaint of workplace bullying and harassment, providing that the complaint is not vexatious or frivolous

4. Taking early corrective action to deal with behaviour that may be inappropriate, offensive or intimidating, even if a complaint has not been made
5. Providing management with adequate information and training on identifying occurrences of bullying and harassment; incident investigation and complaint resolution; and post incident support
6. Taking reasonable management action to direct the way work is carried out and providing feedback on an employee's performance
7. Monitoring the provision and maintenance of a workplace free from harassment and bullying
8. Dealing with all complaints of workplace harassment or bullying in a prompt, impartial and confidential manner
9. Taking appropriate action, which may include termination of employment, for breaches of this policy by an employee under the relevant discipline procedures

Implementation of this policy at each IntoWork business is the responsibility of their senior management. The maintenance and review of this policy is the responsibility of the IntoWork Group CEO. The review will be conducted in consultation with senior management of the IntoWork businesses.

This policy has been developed in consultation with interested parties and with consideration to access and equity principles and legislative requirements.



Poul Bottern
Group CEO

15 December 2021

POLICY VERSION HISTORY

Version	Date Amended	Description of Amendments	Amended By	Approved By
1.0	10/02/2015	Policy created		Group CEO
	14/08/2018	Various amendments.	Risk Manager	Group CEO
2.1	15/12/2021	Title change and various updates to the objectives, definitions, reporting of incidents and management of hazards.	Risk Manager	Group CEO

GUIDANCE NOTES

These Guidance Notes accompany the IntoWork Australia Anti-Bullying and Workplace Harassment Policy. They are provided to assist in achieving the objectives of the Policy at each IntoWork business. These guidance notes are intended to assist you manage situations that fall under the policy and are for guidance use only. Additional information and assistance with the development and implementation of the required management systems is available by contacting IntoWork, People & Performance team.

1. Providing initial and regular information and training regarding workplace harassment and bullying, reporting procedures and the IntoWork policy to all employees.

There is a legal requirement to provide information, instruction and training on risks associated with workplace hazards. Workplace harassment and bullying should be managed like any other workplace hazard. The statement applies to all employees including staff and employees placed at client provided workplaces. The information contained in the policy must be provided. Relevant information should be determined and provided. The business should be able to demonstrate that the policy statement is being implemented. The evidence should include employee awareness of reporting procedures. An example could be including a copy of the policy and relevant information and reporting procedures in an employee induction program.

2. Promoting employee awareness of the right to work in a supportive and mutually respectful workplace free from inappropriate behaviour.

Harassment and bullying is illegal and can be dealt with under health and safety legislation. The intention of the policy statement is that supportive and mutually respectful employees at the workplace will assist in providing a safe and healthy environment free from harassment and bullying. The statement applies to all employees including staff and employees placed at client provided workplaces. The business should be able to provide evidence that the message in the policy statement is being promoted. An example could be promoting the awareness as part of a health and wellbeing program for employees.

3. Providing management with adequate information and training on identifying occurrences of bullying and harassment; incident investigation and complaint resolution; and post incident support.

There is a legal requirement to provide information, instruction and training on risks associated with workplace hazards. The intention of the policy statement is that competency must be available to identify, investigate and resolve cases of harassment and bullying. Post-incident support for victims of harassment and bullying should also be available. The statement applies to all employees including staff and employees placed at client provided workplaces. The business should be able to demonstrate that the competency has been developed to facilitate the processes in the policy statement. Alternatively, management may have adequate information and training to identify bullying and harassment and have procedures in place to engage external services to implement the process in the policy statement.

4. Taking reasonable management action to direct and control the way work is carried out and providing feedback on an employee's performance.

An employee may feel they are being bullied when their performance is being reviewed or when receiving work directions. The above statement applies to all employees including staff and employees placed at client provided workplaces. Reasonable management actions is not workplace bullying if performed in a reasonable and lawful way. The intention of the policy statement is that managers are aware of the potential for the misinterpretation by employees and implement the requirements of the statement. The business should be able to demonstrate that systems are in place to implement the requirements of the policy statement. An example may be training provided to managers on managing the performance of an employee.

5. Monitoring the provision and maintenance of a workplace free from harassment and bullying.

There is a legal requirement to provide and maintain a safe workplace. Workplace harassment and bullying should be managed like any other workplace hazard. The above statement applies to all employees including staff and employees placed at client provided workplaces. The business should be able to provide evidence that the risk of harassment and bullying has been considered and appropriate controls implemented to eliminate or reduce the risk as far as is

reasonably practicable. An example could be including observations for inappropriate behaviour in a workplace inspection checklist.

6. Dealing with all complaints of workplace harassment or bullying in a prompt, impartial and confidential manner.

The intention of the policy statement is that a complaint of harassment and bullying is a sensitive matter that needs to be treated seriously and dealt with as soon as possible. The business should be able to demonstrate that the intention of the statement is included in the complaint systems in place to implement the requirements of the policy statement. An example could be a grievance procedure that addresses the requirement of the policy statement.

7. Taking appropriate action, which may include termination of employment, for breaches of this policy by an employee under the relevant discipline procedures.

The policy statement is applicable to all employees including staff and employees or trainees placed at a client provided workplace. The business would be required to determine, develop and maintain appropriate procedures for dealing with an alleged breach of the policy. This could include for example, conducting an investigation; implementing counselling and disciplinary action; and termination of employment. The business should be able to demonstrate that systems have been developed and maintained to implement the requirements of this policy statement.