

Anti-Discrimination, Harassment, and Bullying

At **LSC&PH**, we foster a diverse and inclusive workforce, free from discrimination and harassment. Our EEO approach embraces diversity, fair treatment, and hiring based on essential skills. Our goal is to create a flourishing and welcoming environment for all.

To foster a safe and vibrant culture for all, our focus lies on:

- Recruitment and selection to ensure fairness.
- Equitable pay and benefits for all.
- Providing reasonable work and workplace adjustments.
- Offering training and development opportunities for growth.
- Planning for succession and promoting from within.
- Providing supportive supervision, mentoring, and coaching.
- Conducting fair performance appraisals and reviews.
- Having accessible grievance procedures.
- Handling terminations with care and sensitivity.

At *LSC&PH*, we have a zero-tolerance approach to discrimination and harassment. All breaches of this policy and procedure will be taken seriously. Those responsible may face disciplinary action as per our Misconduct Procedures.



Principles

- 1** Protection from discrimination based on individual attributes when involved with LSC&PH.
- 2** Providing redress for those who have faced discrimination while engaged with LSC&PH.
- 3** Complying with the positive duty under the Equal Opportunity Act to eliminate discrimination, sexual harassment, and victimization as much as possible.

Your commitment

Adhere to Code of Conduct and this Policy and Procedure.

Support the use of LSC&PH's Feedback and Complaints policy and procedures.

Take part in training on discrimination, harassment, or bullying.

Participate in investigations of complaints and grievances.

Contribute to the review of processes and systems following complaints and grievances.



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Summary

Lord Somers Camp and Power House (LSC&PH) is committed to a diverse workforce, comprised of staff, members, volunteers, participants, contractors and stakeholders ensuring all are free from discrimination and harassment. Negative behaviour will be prevented through recruitment, education, role modelling and adhering to The Code of Conduct.

Equal Employment Opportunity (EEO) goes beyond freedom from discrimination and harassment to also include respect for diversity, good people management and merit-based selection focussing on essential job requirements and necessary competencies.

Allegations of behaviour which contravenes this Policy should be raised and investigated through the processes outlined in the *Managing Breaches of the Code of Conduct Procedure*.

Policy Statement

LSC&PH strives to provide a positive working environment in which all are valued and encouraged to contribute. LSC&PH is bound by all relevant State and Federal legislation in relation to EEO and unlawful discrimination. This legislation ensures that no employee or volunteer (“staff”), members, participant or supporters will be discriminated, harassed or bullied.

Policy Scope

LSC&PH staff are expected to comply with EEO and anti-discrimination legislation, LSC&PH’s *Code of Conduct* and this policy which are founded on:

- Equal Opportunity Act 2010 VIC
- Charter of Human Rights and responsibilities Act 2006 VIC
- Racial and Religious Tolerance Act 2001 VIC
- Fair Work Act 2009 Commonwealth
- Racial Discrimination Act 1975 Commonwealth
- Sex Discrimination Act 1984 Commonwealth
- Disability Discrimination Act 1992 Commonwealth
- Age Discrimination Act 2004 Commonwealth

Guiding Values

- Fun – we find fun in everything we do, and we learn through play.
- Friendship – We promote lifelong friendships through working together and the sharing of experiences.
- Care – We work in a voluntary capacity to care and support others without seeking recognition. We also care for ourselves.
- Acceptance – We accept other people, their values, and their differences. We offer equality of opportunity.
- Belonging – We provide a place where everyone can belong regardless of gender identity, age, culture,

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sexuality, or ability.

Guiding Principles

- Protection from discrimination on the basis of individual attributes when engaged with LSC&PH
- Providing redress for people who have been discriminated against when engaged with LSC&PH
- Comply with positive duty under the Equal Opportunity Act to eliminate discrimination, sexual harassment and victimisation as far as possible

Anti-Discrimination, Harassment, and Bullying Definitions

Bullying or Workplace Bullying	<p>The repeated less favourable treatment of a person by another or others in the workplace which may be considered unreasonable and inappropriate workplace practice. It includes behaviours that may intimidate, offend, degrade or humiliate an employee, possibly in front of participants, co-workers or volunteers.</p> <p>NOTE: Giving an employee or volunteer a directive to perform their duties as per their position description does not constitute bullying and will not be considered under this policy.</p>
Equity	<p>Treating all persons fairly and without discrimination.</p>
Discrimination	<p>Treating a person less favourably than others in similar circumstances because of a personal attribute that has no relevance to the situation.</p> <ul style="list-style-type: none"> • Age discrimination - Discrimination on the basis of age (regardless of age) or on the basis of age-specific characteristics or characteristics generally associated with a person of a particular age. • Disability discrimination - Discrimination on the basis of physical, intellectual, psychiatric, sensory, neurological or learning disability, physical disfigurement, disorder, illness or disease that affects thought processes, perception of reality, emotions or judgement, or results in disturbed behaviour, and presence in body of organisms causing or capable of causing disease or illness (e.g., HIV virus). • Racial discrimination - Discrimination on the basis of race, colour, descent or national or ethnic origin and in some circumstances, immigrant status. • Sex discrimination – Discrimination on the basis of sex, marital or relationship status, pregnancy or potential pregnancy, breastfeeding, family responsibilities, sexual orientation, gender identity or intersex status.
Operational Action	<p>Legitimate and reasonable management actions and business processes, such as actions taken to transfer, demote, discipline, redeploy, retrench or dismiss</p>

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	<p>an employee are not considered to be workplace bullying, provided these actions are conducted in a reasonable way.</p> <p>NOTE: Giving an employee or volunteer a directive to perform their duties as per their position description does not constitute bullying and will not be considered under this policy.</p>
Sexual harassment -	Any form of unwanted, unwelcome, or uninvited sexual behaviour that is offensive, humiliating or embarrassing.
Workplace harassment	Repeated behaviour, other than behaviour amounting to sexual harassment, of one staff member or group of staff members that is unwelcome, unsolicited, and considered to be offensive, intimidating, humiliating, or threatening by another staff member.

Policy Responsibilities

Board	<ul style="list-style-type: none"> Promote best practice, continuous improvement and an open, respectful culture that encourages and supports employees, volunteers, members, participants and other stakeholders to make complaints or raise grievances without fear of retribution.
Chair P and A Committee	<ul style="list-style-type: none"> Coordinate responses to feedback, complaints or grievances of discrimination, harassment, or bullying. involving the CEO, on behalf of the Board.
CEO	<ul style="list-style-type: none"> Ensure that employees, volunteers, members and participants understand and follow LSC&PH's Code of Conduct Coordinate responses to feedback, complaints or grievances of discrimination, harassment, or bullying.
Camp Manager or Camp Leader	<ul style="list-style-type: none"> Operate as LSC&PH's complaints manager of discrimination, harassment or bullying unless the complaint relates to them. This involves coordinating the handling of complaints and ensuring the complaint is effectively managed, including ensuring that the complainant is kept informed about the progress of any investigation / resolution processes.
Executive Teams	<ul style="list-style-type: none"> Coordinate the initial response to a complaint that occurs at a specific LSC&PH program or activity.

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All staff (employees and volunteers)	<ul style="list-style-type: none"> • Comply with the LSC&PH’s Code of Conduct and this Policy and Procedure • Support the use of LSC&PH’s Feedback and Complaints policy and procedures • Participate in training provided on discrimination, harassment or bullying • Participate in investigations of complaints and grievances received • Participate in the review of processes and systems resulting from complaints and grievances received.
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Policy

LSC&PH’s work practices and processes are continuously reviewed to ensure they comply with EEO and anti-discrimination requirements and apply to remunerated and nonremunerated roles with the organization to promote a safe and vibrant culture. These work practices include:

- recruitment and selection
- pay and benefits
- reasonable work and workplace adjustments
- training and development
- succession planning and promotion
- supervision, mentoring and coaching
- performance appraisals/reviews
- grievance procedures
- terminations

Management and leaders, working with LSC&PH people, will develop strategies to prevent and control exposure to the risk of workplace discrimination, harassment and bullying. These will include:

- Provide a Code of Conduct and procedures for managing breach of the Code that defines the expectations of all LSC&PH People.
- Provide all staff with workplace discrimination, harassment and bullying awareness training
- Maintain a feedback, complaint and grievance handling system and inform all participants and members how to lodge a complaint and employees and volunteers on how to lodge a grievance, the support systems available, options for resolving complaints and grievances and the appeals process

Discrimination and Harassment

LSC&PH people will not discriminate, treat unfairly or harass another person because of:

- age

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- breastfeeding
- employment activity
- gender identity
- impairment
- industrial activity
- lawful sexual activity
- marital status
- parental status or status as a carer
- physical features
- political belief or activity
- pregnancy
- race
- religious belief or activity
- sex
- sexual orientation
- personal association (whether as a relative or otherwise) with a person who is identified by reference to any of the above attributes

Sexual harassment includes:

- unwanted attention or touching
- sexual propositions
- leering or staring
- offensive language
- displaying nude images or pornographic material
- persistent requests for dates
- suggestive gestures
- crude or offensive jokes

LSC&PH has a zero-tolerance approach to discrimination and harassment, and disciplinary action may be taken against those responsible in accordance with LSC&PH *Misconduct Procedures*.

Inclusive language

When writing internal or external documents, LSC&PH people must ensure that non-sexist and non-racist language is used by:

- avoiding male-dominated terms (e.g. use 'chair' or 'chairperson' instead of 'chairman')
- eliminating the unnecessary use of the person's gender (e.g. 'female supervisor')
- avoiding the use of 'he' or 'she' (use 'their' instead of 'his' or 'her').

Bullying

LSC&PH has a zero-tolerance approach to bullying, and disciplinary action may be taken against those

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responsible in accordance with LSC&PH *Misconduct Procedures*.

Bullying behaviours may include, but are not limited to:

- Poorly managed conflicts of opinion or personality
- Intimidation
- Abuse of power
- Yelling, screaming abuse, offensive language, insults, inappropriate comments about a person's appearance, life or lifestyle, slandering an employee or their family
- Belittling opinions or constant criticism
- Leaving offensive messages on email, telephone or short message service (SMS)
- Spreading gossip or false, malicious rumours about a person with an intent to cause the person harm
- Isolating employees from normal work interaction, training and development or career opportunities
- Overwork, unnecessary pressure, impossible deadlines
- Underwork, creating a feeling of uselessness
- Undermining work performance or sabotaging a person's work by deliberately withholding work-related information or resources, or supplying incorrect information
- Unexplained job changes, meaningless tasks, tasks beyond a person's skills, failure to give credit where due
- Tampering with an employee's personal effects or work equipment
- Teasing or regularly being made the brunt of pranks/practical jokes
- Displaying written or pictorial material which degrades or offends a worker or group of workers
- Unreasonable 'administrative sanctions' e.g. undue delay in processing applications for training, leave or payment of wages.
- Bullying can be both downwards and upwards

Bullying is not legitimate critique that creates an opportunity for learning and improved outcomes.

Breaches of this Policy

Complaints and grievances will be dealt with promptly and in accordance with relevant State and Federal legislation and LSC&PH's Policies and Procedures.

All breaches of this policy and procedure will be taken seriously. Staff or others who feel they are the

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subject of discrimination, harassment or bullying should refer to the *Feedback and Complaints Policy and Managing Breaches of the Code of Conduct Procedure*, which outlines the steps that they can follow.

Other relevant policies and procedures

- Code of Conduct
- Managing Breaches of the Code of Conduct Procedure
- Child Safety and Client Protection Policy and Procedure
- Feedback and Complaints Policy
- Misconduct Procedure
- Resignation, Termination and Redundancy Procedure

Policy review

This Policy will be reviewed every two years by the LSC&PH Risk Committee, or sooner if warranted by internal or external events or changes.

Changes to the policy and procedure will be approved for implementation by the LSC&PH Board.