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PURPOSE

This Policy articulates Kardinia Park Stadium Trust's (KPST's) commitment to providing a safe and respectful work environment free from discrimination, harassment, sexual harassment, victimisation, and vilification.

This Policy aims to ensure that all potential and existing employees are treated with dignity and respect and are provided with equal-employment opportunities in relation to their recruitment, promotion, transfer, remuneration and conditions of employment, training, working environment, termination, and redundancy. All KPST employees are required to treat others at work with dignity, courtesy, and respect.

KPST has a standalone Sexual Harassment Policy which must be read in conjunction with this Policy for matters involving sexual harassment.

SCOPE

This Policy applies to all KPST employees, including the Chief Executive Officer (CEO), Trustees, job candidates, students on placements, trainees, volunteers, and other workplace participants (such as contractors, service providers, hirers, gig workers).

For the purposes of this policy, a workplace is any place a person attends for the purpose of carrying out functions in connection with, or in the course of their employment or prospective employment. For example, this policy also pertains to employees who visit other premises or participate in activities connected to the workplace i.e. the same behavioural standards that exist in the KPST's workplaces, apply at other premises that employees visit. This policy also covers the conduct of customers, fans, patrons and members of the public.

This policy applies to circumstances including, but not limited to:

- how KPST provides services to customers and other third parties, and how it interacts with other members of the public, fans, patrons and other stakeholders;
- all aspects of employment, recruitment and selection, conditions and benefits, training and promotion, task allocation, shifts, hours, leave arrangements, workload, equipment and transport;
- on-site, off-site, work-related social functions, conferences, business trips – wherever and whenever employees may be as a result of their working duties;
- out of work hours conduct, including conduct on social media, where there is a connection to the employment relationship; and

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- employees treatment of other employees, customers, and members of the public, fans, patrons and other stakeholders encountered in the course of their working duties.

RELEVANT LEGISLATION

KPST has a responsibility to prevent unlawful discrimination, unlawful harassment (including sex-based harassment and sexual harassment), related acts of victimisation and bullying in the workplace under both Commonwealth and state and territory legislation as identified below.

- Sex Discrimination Act 1984 (Cth)
- Racial Discrimination Act 1975 (Cth)
- Disability Discrimination Act 1992 (Cth)
- Age Discrimination Act 2004 (Cth)
- Australian Human Rights and Equal Opportunity Commission Act 1986 (Cth)
- Fair Work Act FWA 2009 (Cth)
- Workplace Injury, Rehabilitation and Compensation Act 2013 (Vic)
- Workplace Gender Equality Act 2012 (Vic)
- Equal Opportunity Act 2010 (Vic)
- Occupational Health and Safety Act 2004 (Vic)
- Racial and Religious Tolerance Act 2001 (Vic)
- Crimes Act 1958 (Vic)
- Charter of Human Rights and Responsibilities Act 2006 (Vic)
- Public Administration Act 2004 (Vic)

Employees are also required to conduct themselves in a manner that is consistent with the public sector values and employment principles set out in the *Public Administration Act 2004*, and further defined through the Code of Conduct for Victorian Public Sector Employees.

THE POLICY

KPST is committed to the following guiding principles:

- KPST recognises that all people have dignity and the right to be respected and treated fairly
- KPST will not tolerate or condone unlawful direct or indirect discrimination, sexual or racial harassment, bullying, victimisation or vilification.
- KPST will aim to educate its people in being able to recognise (in others and themselves), report, prevent and deal with unlawful discrimination, bullying and harassment behaviours.
- KPST will provide avenues for resolving complaints of unlawful discrimination, bullying and harassment complaints
- Complaint resolution options will be fair, consistent, transparent and actioned within reasonable timeframes.

1. EQUAL EMPLOYMENT OPPORTUNITY

KPST is an equal opportunity employer and recognises that Equal Employment Opportunity (EEO) is a matter of employment obligation, social justice, and legal responsibility.

KPST will not unlawfully discriminate against any job applicants, employees, contractors, volunteers and customers. It will base its employment-related decisions (e.g. recruitment and selection, promotion, training and development, tasks allocation and workload, shifts, hours of work, leave arrangements) on merit and not on any personal attributes protected by applicable federal or state anti-discrimination and equal employment opportunity legislation.

2. WHAT IS UNLAWFUL DISCRIMINATION?

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“Unlawful discrimination” occurs when a person or group is treated, or it is proposed they be treated, unfavourably because of a range of attributes or personal characteristics protected by Commonwealth or state law. In Victoria, it is unlawful to discriminate based on protected attributes which include:

> Age	> Status as a Parent or Carer
> Breastfeeding	> Physical Features
> Disability	> Pregnancy
> Employment Activity	> Race
> Gender Identity	> Sex and sex characteristics
> Industrial Activity/Inactivity	> Sexual Orientation or Preference, and expunged homosexual convictions
> Lawful Sexual Activity	> Political or Religious Beliefs or Activities
> Marital Status	> Association with someone with above attributes
> Irrelevant or spent criminal conviction	> Profession trade or occupation

In addition to the protected attributes listed in the *Equal Opportunity Act 2010 (Vic)*, the *Fair Work Act 2009 (Cth)* contains the following protected attributes: race, colour, sex, sexual orientation, breastfeeding, gender identity, intersex status, age, physical or mental disability, marital status, family or carer’s responsibilities, subjection to family and domestic violence, pregnancy, religion, political opinion, national extraction and social origin.

Unlawful discrimination includes both direct and indirect discrimination.

“**Direct discrimination**” occurs when a person or group is treated, or it is proposed they be treated, unfavourably because of a protected attribute such as sex, age, race, or disability. For example, a worker is harassed and humiliated because of their race, or a worker is refused a promotion because they are ‘too old’.

“**Indirect discrimination**” occurs when an unreasonable requirement, condition or practice is imposed that disadvantages a person, or a group of people, with a protected attribute. For example, regular staff meetings scheduled out of standard hours may indirectly discriminate against people with family responsibilities.

The discrimination does not have to be based on the fact that the person has an attribute, it can also be because:

- The person had the attribute at some point in time
- The person has/had a characteristic that a person with the particular attribute generally has or is imputed to have
- The person is presumed to have or to have had the attribute or to have it in the future.

Discrimination will not be in breach of this policy if an exception or exemption applies under any applicable anti-discrimination legislation.

3. WHAT IS HARASSMENT?

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Harassment includes conduct that is unwelcome, and that, in the circumstances, a reasonable person would anticipate would humiliate, offend or intimidate someone. It can be a one-off event, and can include sexual, racial or general workplace harassment which has the potential to create an intimidating, hostile, offensive or distressing work environment. Harassment, like discrimination, can be unlawful if it is based on a protected attribute.

Some examples of harassment include but are not limited to:

- Mimicking someone's accent
- Verbal abuse or unwelcome nicknames
- Practical jokes
- Derogatory or offensive comments

Behaviour can constitute harassment even if it was not intended to offend or harm the other individual. For example, a third party overhearing a conversation, or sighting another person's computer screen, may make a complaint if they are offended. Harassment may occur as a single act or a series of incidents.

4. WHAT IS SEXUAL HARASSMENT?

KPST will not tolerate unlawful sexual harassment in the workplace. Sexual harassment is unlawful and prohibited by both the *Equal Opportunity Act 2010* (Vic) and the *Sex Discrimination Act 1984* (Cth).

This Policy section must be read in conjunction with KPST's Sexual Harassment Policy.

Sexual harassment in the workplace may take various forms and can be directed at, and perpetrated by, all persons including men, women, transgender people, and those who identify as non-binary. It may be physical, spoken or written and may include, but is not limited to:

- unwelcome physical contact of a sexual nature such as deliberately brushing up against someone, pinching, touching, grabbing, kissing or hugging;
- comments or questions of a sexual nature about a person's private life or their appearance;
- sexually suggestive behaviour, such as leering or staring or offensive gestures;
- sexually explicit conversation, sexually suggesting comments or jokes;
- displaying offensive screen savers, photos, calendars or objects;
- repeated requests to go out;
- unwanted displays or declarations of affection;
- requests for sexual favours;
- insults or taunts of a sexual nature;
- sexually explicit emails, text messages or posts on social networking sites;
- displaying sexually explicit sites and pornographic material at work;
- sexual assault, indecent exposure, physical assault and stalking (which are also criminal offences); or
- actions or comments of a sexual nature in a person's presence (even if not directed at that person).

The *Equal Opportunity Act 2010* and the *Sex Discrimination Act 1984* provide that sexual harassment occurs in circumstances in which the conduct is unwelcome, sexual in nature and where a reasonable person, having regard to all the circumstances, would have anticipated that the other person would be offended, humiliated or intimidated.

Please refer to KPST's Sexual Harassment Policy and Procedure for further information including our sexual harassment reporting and responding processes.

Sex-Based harassment

Sex-based harassment involves behaviour that is sexist and demeaning in nature, but that is not necessarily sexual. Sex-based harassment is unlawful when it occurs in circumstances in which a

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reasonable person, aware of those circumstances, would anticipate that the person being harassed might feel offended, humiliated or intimidated. It can happen when a person is degraded, put down or disrespected because of their sex, or a characteristic generally associated with people of that sex.

Hostile work environments

It is unlawful (and a breach of this policy) for a person to subject another person to a workplace environment that is hostile on the ground of sex. This will occur if a person engages in conduct in the workplace and a reasonable person would have anticipated that the conduct would result in the workplace environment being offensive, intimidating or humiliating to a person by reason of the sex of that person, a characteristic that appertains generally to persons of the sex, or a characteristic that is imputed to the sex of that person.

5. WHAT IS BULLYING?

KPST will not tolerate bullying in the workplace.

Employees have a legal obligation not to engage in acts of bullying towards others.

“Bullying” is the repeated and unreasonable behaviour by an individual or group directed towards an individual or group where that behaviour creates a risk to health and safety.

“Risk to health and safety” includes risk to the mental or physical health of the employee.

In determining whether the behaviour of an employee constitutes bullying, it is irrelevant whether or not the employee is aware of the bullying, and whether or not it is intentional.

Bullying can include, but is not limited to:

- Threats, physical or verbal abuse and shouting;
- Spreading malicious rumors or gossip;
- Teasing or playing jokes;
- Intimidation;
- Psychological harassment;
- Unjustified criticism or complaints;
- Excluding or isolating people from workplace activities;
- Cyber bullying;
- Deliberately excluding, isolating, ignoring or marginalising a person;
- Constant unconstructive criticism;
- Deliberately withholding information or equipment that a person needs to do their job or access their entitlements;
- Unreasonable refusal of requests for leave, training or other workplace benefits;
- Giving someone too much or too little work; and
- Giving someone work above or below their skill level .

Bullying can be verbal or in writing, including online comments. Bullying can be carried out by one or more person and can be experienced by individuals as well as groups of people. Bullying can be directed downwards (from Supervisors/Managers to Workers), sideways (between Workers) or upwards (Workers to Supervisors/Managers).

A single incident of unreasonable behaviour does not constitute bullying. However, the behaviour may, depending on the circumstances, constitute unlawful discrimination, harassment, sexual harassment, vilification or other misconduct, in breach of KPST policy.

What is not Bullying?

Bullying does not include:

- Nonaggressive conflicts and general problems in working relations
- Difference of opinion

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- Reasonable management action that is carried out in a reasonable way.

Managers have the right and are obliged to manage their employees. This includes directing the way in which work is performed, undertaking performance reviews and providing feedback (including negative feedback), disciplining and counselling employees. Examples of reasonable management action and practices include (but are not limited to):

- Directing how work is undertaken by employees where such direction is communicated in a reasonable manner;
- Setting reasonable performance goals, standards and deadlines;
- Ongoing meetings to address underperformance, informing a worker about unsatisfactory performance in a constructive way in accordance with any other workplace policies;
- Counselling or disciplinary action for misconduct or investigating alleged misconduct;
- Not selecting a worker for promotion, following a fair process;
- Giving an employee feedback on areas for improvement in their performance;
- Implementing organisational changes or restructuring.

6. WHAT IS RACIAL AND RELIGIOUS VILIFICATION?

The *Racial and Religious Tolerance Act 2001* (Vic) and the *Racial Discrimination Act 1975* (Cth) make racial and religious vilification unlawful.

Racial or religious vilification is behaviour that incites hatred, serious contempt for, or revulsion or severe ridicule of a person or group of people because of their race or religion.

Vilification may include:

- Speaking about a person's race or religion in a way that could make other people hate or ridicule them
- Publishing claims that a racial or religious group is involved in serious crimes without any proof
- Repeated and serious spoken or physical abuse about the race or religion of another person
- Encouraging violence against people who belong to a particular race or religion, or damaging their property
- Encouraging people to hate a racial or religious group using flyers, stickers, posters, a speech or publication, or using websites or email.

It is also against the law to give permission or help someone to vilify others.

Racial or religious vilification may be constituted by a single incident or a number of incidents over a period of time.

Motive and knowledge

In determining whether a person discriminates, harasses, sexually harasses or racially vilifies another person:

- It is irrelevant whether that person is aware of the discrimination, harassment, sexual harassment or vilification.
- The person's motive is irrelevant.
- It is irrelevant that the person did not intend to discriminate, harass, sexually harass or vilify.

7. WHAT IS VICTIMISATION?

KPST will not tolerate victimisation in the workplace.

Victimisation is unlawful under various laws including the *Equal Opportunity Act 2010* (Vic) and the *Australian Human Rights Commission Act 1986* (Cth).

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Victimisation, which means to treat someone badly or unfairly, is subjecting or threatening to subject someone to a detriment because they have asserted their rights under equal opportunity law, made a complaint, witnessed or helped someone else make a complaint, or refused to do something because it would be discrimination, sexual harassment, or victimisation.

Any person found to victimise, harass or take reprisal action against people participating in procedures associated with this policy may be subject to separate disciplinary action.

Please contact People and Culture immediately if you have experienced any unfair treatment or detriment as a result of making a report or helping another person to make a report.

8. WHAT IS BYSTANDER INTERVENTION?

Bystanders, including colleagues, who witness or are aware of behaviours inconsistent with this policy, can play an important role in promoting a safe and respectful culture for all. When grounded in behaviours of integrity and respect, action taken by colleagues can positively impact on defining workplace culture.

Bystanders who are aware of behaviours inconsistent with this Policy are strongly encouraged to:

- Provide support to the colleague subjected to the behaviours
- Formally or informally raise the concerning behaviour (with the person displaying these behaviours, a manager, supervisor or People and Culture
- Report clear breaches of the policy.

9. CONFIDENTIALITY

Where appropriate, reports of conduct which may breach this policy will be treated in confidence to protect a person's personal privacy as much as possible. However, in some instances, a matter may need to be escalated or referred without agreement from the person who has made the report, particularly in circumstances that may:

- Constitute a criminal offence
- Constitute an occupational health and safety risk
- Require disciplinary action.

Only relevant persons within KPST will be advised of the report and any arrangements necessary for the purpose of managing the report.

While KPST will endeavour to maintain confidentiality as far as possible, it may be necessary to speak with other workplace participants to determine what occurred.

Discretion is important to protect all people concerned. All employees are required to observe confidentiality of complaints of which they become aware. If you are found to be inappropriately discussing a complaint, you may be disciplined for that conduct.

10. WHAT IS OCCUPATIONAL VIOLENCE?

Occupational violence is defined as any incident where an employee is physically attacked or threatened in the workplace. Problems or tensions in the workplace are encouraged to be dealt with quickly and effectively. Occupational violence will not be tolerated by KPST. KPST considers sexual harassment a form of gendered occupational violence.

PROCEDURE

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INFORMAL PROCESS

In some circumstances, it may be appropriate to address harassment, sexual or racial harassment, bullying informally. This may include speaking directly to the person concerned, explaining you find their behaviour unwelcome and unacceptable and that it needs to stop immediately. Employees should only speak directly to the person concerned if they feel comfortable. They should also keep notes of their concerns and the steps taken to resolve them.

In other circumstances, employees may prefer to contact a Manager, General Manager, Supervisor, Account/Contract Manager, Executive Manager People and Culture, who may arrange other informal processes including conducting or facilitating discussions to address the behaviour, or refresher training for the general work area on the requirements of this policy.

Where a report is dealt with informally, management should document and keep a record of any action taken in relation to the report.

Employees may also prefer to contact an Equal Opportunity Contact Officer who is trained in equal opportunity principles. They are a point of contact for employees and provide assistance and support. Their role is not to resolve the complaint, but to provide information and present options for resolution. Equal Opportunity Contact Officers do not represent KPST or the employee, and they do not provide legal advice.

FORMAL PROCESS

In other cases, a more formal approach may be appropriate. Formal processes typically involve the Executive Manager, People and Culture, direct manager, General Manager or Account/Contract Manager assessing the report and determining whether the conduct occurred, and if it breaches this Policy (or any other related policies) or is unlawful. In some circumstances, it may be appropriate to appoint an independent third party to conduct the investigation.

Such process will be undertaken in line with relevant organisational policies, procedures and industrial instruments.

In some instances, it may be necessary or appropriate to temporarily change operations within a team to ensure a safe workplace and maintain the integrity of any review process. Changes may include:

- operational change to reporting lines and team composition;
- change to seating arrangements;
- change to the management of contractors, suppliers, third parties
- performing alternative duties;
- change to physical work location;
- a change of roster;
- taking periods of approved leave; or
- suspension.

It will not be presupposed that the temporary change will involve the person who has made a report. The person who has made the report should be consulted before any decision relating to temporary change involving them or the respondent is finalised. It is important that the measures do not result in any detriment to the person who has made the report (as this may amount to victimisation, which is unlawful). Safety and confidentiality of the process are key considerations in identifying appropriate temporary changes.

The CEO will be kept informed of any informal or formal matters under investigation from a risk management perspective, while ensuring strict confidentiality for all parties involved. In some cases, it may be appropriate for the investigator to work directly with the Trustees, as identified by the Chair of the Trust, to ensure transparency and appropriate oversight.

OUTCOMES OF SUBSTANTIATED CLAIMS

A substantiated report of bullying, or unlawful harassment such as sexual or racial harassment may amount to misconduct or serious misconduct and may include disciplinary action up to and including termination of employment or service agreement.

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NATURAL JUSTICE AND PROCEDURAL FAIRNESS

Both the person who made the report and respondent are to be afforded natural justice and procedural fairness.

When considering the report of bullying, or unlawful harassment such as sexual or racial harassment, the person who made the report and respondent will be:

- treated fairly and respectfully; and
- provided the opportunity to respond to allegations of sexual harassment made against them.

FALSE COMPLAINTS

Allegations of inappropriate behaviour are serious matters and can potentially damage an individual's reputation. KPST takes workplace grievances very seriously. We expect complainants to have a sound basis for the allegations made and that any grievances are made in good faith.

Complaints found to be frivolous, vexatious, or malicious, may lead to disciplinary action being taken against the complainant including but not limited to:

- Formal apology and acknowledgement that the behaviour will cease;
- Formal disciplinary action including termination of employment or contractual arrangement

If the investigation determines that discrimination, bullying or harassment has occurred or that vexatious or malicious accusations have been made, the manager must place on file a summary of the complaint and the action taken.

EXTERNAL COMPLAINT RESOLUTION MODEL

Any employee that does not feel comfortable making an informal or formal equal opportunity, discrimination or bullying complaint within KPST is able to direct their issues directly to the Victoria Equal Opportunity Commission, the Australian Human Rights Commission, WorkSafe or the Fair Work Commission. However, KPST encourages affected employees to use the internal complaint resolution model first.

Effective 6 March 2023, in addition to 'stop sexual harassment order' powers, the Fair Work Commission can deal with disputes by conciliation, mediation, making a recommendation or expressing an opinion and arbitration.

RESPONSIBILITIES

POSITIVE DUTY

KPST must take reasonable and proportionate measures to eliminate discrimination, sexual harassment and victimisation as far as possible.

VICARIOUS LIABILITY

Under the Equal Opportunity Act and Sex Discrimination Act, KPST can be held vicariously liable for discrimination or sexual harassment engaged in by its employees unless it can demonstrate that it took reasonable precautions to prevent the discrimination or sexual harassment.

CEO and all People Managers must ensure that:

- Their employment practices, including making decisions in regard to their employees' employment conditions, recruiting, promoting, training, developing, dismissing or transferring are based on merit, and are free from any discriminatory assumptions;
- They take measures to proactively prevent behaviour which breaches this Policy;

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- They identify and address any behaviour that could be discriminatory, bullying, sexually harassment, victimising or vilifying within their work teams;
- Their employees understand their responsibilities to not discriminate against, bully, sexually or racially harass, victimise, or vilify or authorise or assist anyone else to do so;
- They promote awareness of this policy including ensuring employees are aware of how and where to make a report
- They treat all reports seriously and take prompt and appropriate action to address them;
- They model appropriate standards of behaviour;
- They seriously consider requests for flexible work arrangements, as per the KPST's Flexible Working Arrangements Policy.
- They make reasonable adjustments for persons with a disability;
- They act fairly to resolve issues and enforce workplace behavioural standards, making sure relevant parties are heard;
- They assist employees and others to resolve issues informally;
- They ensure employees and others who raise an issue or make a report are not victimised; and
- They offer support to any employee who discloses or reports sexual harassment to them, including the employee assistance program (EAP).

Managers and Supervisors must also:

- Model appropriate standards of behaviour
- Assist employees and others to resolve issues informally including offering support to any employee who discloses or reports sexual harassment to them, including the employee assistance program (EAP);
- Refer complaints about breaches of this policy to the appointed complaint handling officer for investigation such as a member of the People and Culture team ;
- Ensure employees who raise an issue or make a complaint are not victimised;
- Ensure that recruitment decisions are based on merit and that no discriminatory requests for information are made;
- Seriously consider requests for flexible work arrangements, as per KPST's Flexible Working Arrangements Policy;
- Seek advice from People and Culture on any EEO, bullying, harassment, and discrimination matters if unclear or unsure what to do.;
- Act fairly to resolve issues and enforce workplace behavioural standards, making sure relevant parties are heard;
-
- Promote awareness of this policy within their area including ensuring employees are aware of how and where to make a report; and
- Treat all reports seriously and take prompt and appropriate action to address them.

KPST employees must ensure that they:

- Understand their responsibilities and contribute to an environment which is free of discrimination, bullying and harassment by treating others with dignity and respect, and acting in accordance with the Code of Conduct;
- Do not discriminate against, bully, sexually or racially harass, victimise or vilify anyone or authorise or assist anyone else to discriminate against, sexually harass, bully, victimise or vilify others;
- Report, address and resolve offensive action and participate in good faith;
- Conduct themselves appropriately and lawfully at all times within the workplace; Treat everyone with dignity, courtesy and respect; and
- Maintain complete confidentiality if they are involved in (amongst other things) the investigation of a report or dispute resolution procedures.

All staff are entitled to:

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- recruitment and selection decisions based on merit and not affected by irrelevant personal characteristics
- work free from discrimination, bullying and sexual harassment
- the right to raise issues or to make an enquiry or complaint in a reasonable and respectful manner without being victimised
- reasonable flexibility in working arrangements, especially where needed to accommodate their family responsibilities, disability, religious beliefs or culture.

EMPLOYEE ASSISTANCE PROGRAM (EAP) AND EXTERNAL SUPPORT

KPST runs a voluntary external EAP available to all employees at all times via independent professional counsellors. Employees can find information about EAP via their manager, People and Culture, OH&S boards and on TURF (KPST's intranet).

BREACHES OF THIS POLICY

The consequences of breaching this policy will depend on the seriousness of the matter and may include disciplinary action up to and including termination of employment.

RELATED DOCUMENTS

HRPOL001 Code of Conduct

HRPOL009 Disciplinary Policy and Procedure

HRPOL027 Sexual Harassment Policy and Procedure

HRPOL039 Flexible Working Arrangements Policy and Guideline

GOV024 Conflict of Interest Policy and its relevant procedure

[Conditions of entry - Kardinia Park Stadium Trust](#)

VERSION CONTROL AND CHANGE HISTORY

Version Number	Date	Details of Change
1	21.03.2017	First version
2	22.12.2017	Update
3	12.08.2019	Consolidating Bullying, Harassment, Discrimination and Equal Opportunity policies and procedures
4	1.11.2021	Internal complaint handling process changed- removed distinction between formal and informal resolution process. Language changed in places for clarity.

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5	27/07/2023	Updated for FWA changes and changes to the Sex Discrimination Act
6	25 June 2025	Updated by the Victorian Government Solicitor's Office in line with latest changes in Sex Discrimination Act. Changes include extracting sexual harassment topic into a separate policy and procedure a new requirement under this Act