

INF Australia Prevention of Bullying and Harassment Policy v2

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1 Purpose

To outline INF Australia's (INFA's) commitment to preventing and responding to bullying and harassment in all work-related contexts, and to provide a clear framework for addressing grievances in a manner that protects dignity, safety, and justice.

2 Scope

This policy applies to all INFA employees, volunteers, Board members, contractors, ambassadors, and partners. It covers conduct in any work-related setting, including conferences, social events, online platforms, and travel.

3 Policy Statement

INFA does not tolerate bullying or harassment under any circumstances. All individuals associated with INFA are responsible for maintaining a respectful, inclusive, and safe environment. Breaches of this policy may result in disciplinary action, including termination.

INFA encourages individuals to report concerns promptly and assures that all complaints will be handled confidentially, fairly, and in accordance with natural justice. Victimisation or retaliation against complainants or respondents is strictly prohibited.

Both federal and state legislation provide that harassment is unlawful and establish minimum standards of behaviour for all employees. No employee at any level should subject any other employee, volunteer, supporter or visitor to any form of harassment, sexual or otherwise.

4 Christian Basis for the Policy

As a Christian organisation, we affirm that every person is created in the image of God (Genesis 1:27) and is therefore worthy of dignity, respect, and protection. Scripture consistently calls God's people to defend the vulnerable and to act with justice, compassion, and love in all relationships. We are commanded to "love your neighbour as yourself" (Mark 12:31), to "act justly, love mercy, and walk humbly with your God" (Micah 6:8), and to "encourage one another and build each other up" (1 Thessalonians 5:11).

Bullying, intimidation, and harassment stand in direct contrast to these biblical values. We are instructed not only to refrain from causing harm but also to intervene on behalf of those who suffer injustice: "Speak up for those who cannot speak for themselves... defend the rights of the poor and needy" (Proverbs 31:8–9). Likewise, we are reminded that "love does no harm to a neighbour" (Romans 13:10).

INFA is therefore committed to cultivating a safe, respectful, and Christ-honouring environment, to prevent all forms of bullying and harassment, and to respond promptly, fairly, and compassionately when concerns arise.

4. Procedures

4.1 Reporting

- Individuals may raise concerns directly with the person involved, preferably in consultation with a manager or the CEO.
- Alternatively, complaints may be submitted via INFA's Complaints Handling Policy.
- Reports of sexual harassment are treated with utmost seriousness and confidentiality.
- Complainants may remain anonymous or deidentified where possible, in line with procedural fairness.

4.2 Investigation

- INFA will determine the appropriate response based on the nature of the complaint.
- Both complainant and respondent have the right to support, representation, and a fair process.
- No presumption of guilt will be made prior to a full investigation.

4.3 Resolution

- Outcomes may include mediation, disciplinary action, or referral to external bodies.
- Managers who fail to act on known harassment may face disciplinary consequences.

4.4 External Recourse

- Individuals retain the right to seek assistance from relevant tribunals or legal bodies.

4.5 Training

- All employees must familiarise themselves with this policy as a condition of employment.
- If a culture of bullying or harassment is suspected, the CEO will arrange mandatory training.

4.6 Continuous Improvement

- INFA commits to reviewing and strengthening this policy following any allegation, substantiated or not.

5 Roles and Responsibilities

Role	Responsibilities
All Staff & Volunteers	Uphold respectful conduct and report concerns
Managers	Respond to complaints, model appropriate behaviour, and take corrective action
CEO	Oversee training, investigations, and policy implementation
Board Chair	Investigate any complaints concerning the CEO
Board	Provide oversight and ensure compliance with legal and ethical standards

6 Related Documents and Policies

- ACFID Code of Conduct Commitment 9.2.3
- Code of Conduct
- Complaints Handling Policy
- Discipline & Grievance Policy
- Prevention of Sexual Exploitation, Abuse and Harassment Policy
- Whistleblower Policy

7 Monitoring, Evaluation and Review

- The CEO monitors implementation and reports to the Board.
- Policy is reviewed every five years or following significant incidents.

8 Appendices

- Appendix A: Procedures for Handling Bullying and Harassment Complaints
- Appendix B: Anonymous Reporting Template
- Appendix C: Detailed description and examples of harassment
- Appendix D: Summary of rights and support options for complainants and respondents

9 Definitions

Term	Definition
Bullying	Offensive or intimidating behaviour or an abuse or misuse of power which undermines or humiliates an employee.
Cyberbullying	Using or sending cruel and intimidating messages via email, text or other electronic means including social media sites. Its impact can be significant due to the potentially large audience and the fact that comments can be made anonymously.
Harassment	Harassment is any unwanted conduct based on a protected characteristic or of a sexual nature that violates an employee's dignity or creates an intimidating, hostile, degrading, humiliating, or offensive work environment—whether by a single serious incident or repeated behaviour, intentional or not, and including less favourable treatment for rejecting or submitting to such conduct.

10 Document Control

Date	Version	Summary of Changes	Sections Changed	Authorised By
July 2018	1	New Policy	All	Board
Feb 2026	2	Major revision	All	Board

Appendix A Procedures for Handling Bullying and Harassment Complaints

A1 Reporting and Lodgement

1. Employees or volunteers who experience or witness bullying or harassment may choose an informal or formal reporting pathway.
2. Informal reports can be made directly to the person whose behaviour is at issue, accompanied by a manager, or the CEO, or a trusted friend.
3. Formal complaints must be submitted in writing to the CEO, or where the complaint involves the CEO, the Board Chair.
4. Anonymous or de-identified reports are accepted; in such cases the organisation will gather sufficient detail to progress an investigation while protecting the reporter's identity.

A2 Acknowledgement and Initial Assessment

1. Upon receiving a formal complaint, the recipient acknowledges receipt in writing within two business days.
2. The CEO (or Board Chair) conducts an initial assessment to determine:
 - Whether the report falls within the bullying and harassment policy scope
 - The urgency or risk level of the allegations
 - Any immediate safety or support measures required
3. Where urgent action is needed, interim steps (such as adjusting reporting lines or placing individuals on leave) may be implemented before a full investigation.

A3 Investigation

1. The CEO appoints an impartial investigator, either internal or external, with no conflict of interest.
2. The investigator:
 - Reviews the complaint and any supporting evidence
 - Interviews the complainant, the respondent, and relevant witnesses
 - Maintains confidentiality and natural justice throughout
3. Investigations are to be completed within 20 business days, with extensions permitted for complex cases, provided both parties are informed of the revised timeline.

A4 Findings and Decision

1. The investigator prepares a written report summarising:
 - Factual findings
 - Relevant policy or legislative breaches
 - Recommended actions
2. The CEO (or Board Chair, if appropriate) review the report and determine corrective measures, which may include:
 - Mediation or facilitated discussion

- Training or coaching for one or more parties
 - Disciplinary action up to termination
- 3. Both complainant and respondent receive a written outcome, including any remedies, within five business days of the decision.

A5 Appeals

1. Either party may lodge an appeal in writing within ten business days of receiving the outcome.
2. Appeals are directed to the Board Chair (if not already involved) or a delegated appeals panel.
3. The appeals panel reviews the original investigation report, new evidence, and procedural fairness before issuing a final decision within 15 business days.

A6 Support, Confidentiality and Non-Retaliation

- Complainants, respondents and witnesses may access pastoral care or counselling services throughout the process.
- All parties are entitled to representation or support persons during interviews.
- The organisation prohibits any form of retaliation or victimisation; any such behaviour is treated as a serious policy breach.

A7 Record-Keeping and Reporting

- All complaint-related records are stored securely by the CEO (or Board Chair) and kept separate from personnel files.
- Records include the complaint, investigation notes, decisions, corrective actions and review outcomes.
- The CEO will then provide an anonymised report to the Board, summarising the number, type and resolution status of complaints.

A8 Continuous Improvement

- Following each completed case, the CEO and (where applicable) the Board review lessons learned and identify policy or procedure enhancements.
- Training on bullying and harassment prevention is scheduled annually or more frequently if trends emerge.
- Policy and procedure effectiveness is evaluated at each policy review cycle or after significant incidents.

Appendix B Anonymous Reporting Template

This form allows individuals to report concerns without disclosing their identity, while still providing enough detail for follow-up.

INF Australia – Anonymous Bullying/Harassment Report Form

- **Date of Incident (or date range):**
[Insert date]
- **Location of Incident:**
[e.g. office, online, event name]
- **Type of Concern** (tick all that apply):
 - ☐ Bullying
 - ☐ Sexual Harassment
 - ☐ Discrimination
 - ☐ Cyberbullying
 - ☐ Other: *[specify]*
- **Description of Incident:**
[Please describe what happened, including any relevant context or quotes. You may omit names if preferred.]
- **Who was involved?**
[Optional: include roles or initials if known]
- **Was this a one-time incident or ongoing?**
 - ☐ One-time
 - ☐ Ongoing
- **Have you witnessed or experienced this directly?**
 - ☐ Witnessed
 - ☐ Experienced
 - ☐ Heard from others
- **Any supporting evidence?**
[Optional: describe or attach screenshots, emails, etc.]
- **Preferred follow-up:**
 - ☐ No follow-up needed
 - ☐ Investigate anonymously
 - ☐ Provide general staff training
 - ☐ Other: *[specify]*
- **Additional Comments or Suggestions:**
[Optional]

Appendix C Detailed description and examples of harassment

Harassment occurs where, on the grounds of an employee's race, colour, ethnic origin, nationality, national origin, religion or belief, sex, gender, sexual orientation, gender reassignment, age, marital or civil partnership status or disability, or unwanted conduct of a sexual nature, a person engages in unwanted conduct that:

- has the purpose of violating the employee's dignity at work, or of creating an intimidating, hostile, degrading, humiliating or offensive work environment for the employee; or
- is reasonably considered by the employee to have the effect of violating their dignity at work, or of creating an intimidating, hostile, degrading, humiliating or offensive work environment for the employee, even if this effect was not intended by the person responsible for the conduct.

The employee does not need to be the subject of the unwanted conduct for harassment to have occurred - for example, the conduct could be directed at nobody in particular or at someone other than the employee. Something intended as a "joke" or as "office banter" may offend another person. This is because different employees find different levels of behaviour acceptable and everyone has the right to decide for themselves what behaviour they find acceptable to them.

Behaviour which a reasonable person would realise would be likely to offend an employee will always constitute harassment without the need for the employee having to make it clear that such behaviour is unacceptable, for example, touching someone in a sexual way. With other forms of behaviour, it may not always be clear in advance that it will offend a particular employee, for example, office banter and jokes. In these cases, the behaviour will constitute harassment if the conduct continues after the employee has made it clear, by words or conduct, that such behaviour is unacceptable to them. A single incident can amount to harassment if it is sufficiently serious.

Harassment also occurs where, on the grounds of the employee's rejection of, or submission to, unwanted conduct of the kind specified above, a person treats an employee less favourably than they would treat them, had they not rejected, or submitted to, the unwanted conduct.

C1 Examples

Bullying and harassment may be verbal, non-verbal, written or physical. Examples of unacceptable behaviour include, but are not limited to, the following:

- unwelcome sexual advances, requests for sexual favours, other conduct of a sexual nature
- subjection to obscene or other sexually suggestive or racist comments or gestures
- the offer of rewards for going along with sexual advances or threats for rejecting sexual advances
- jokes or pictures of a sexual or racial nature
- demeaning comments about an employee's appearance
- questions about a person's sex life
- the use of nicknames related to an employee's sex, sexual orientation, gender reassignment, race, religion, age or disability
- picking on or ridiculing an employee
- posting offensive material online

- isolating an employee or excluding them from social activities or relevant work-related matters.

Appendix D Summary of Rights and Support Options for Complainants and Respondents

INF Australia is committed to ensuring that all parties involved in a bullying or harassment complaint are treated with dignity, fairness, and procedural integrity. The following rights and support options apply to both complainants and respondents:

D1 Right to Be Heard

- Both parties have the right to present their account, submit evidence, and respond to any allegations or findings.
- No presumptions of guilt will be made prior to a full and fair investigation.

D2 Right to Confidentiality

- All complaints are handled with discretion.
- Personal information is protected in accordance with INFA's Privacy Policy and legal obligations.
- Where anonymity is requested, INFA will take reasonable steps to de-identify the complainant while ensuring procedural fairness.

D3 Right to Support and Representation

- Complainants and respondents may access pastoral care, counselling, or professional support services.
- Each party may nominate a support person or representative to accompany them during interviews or meetings.
- INFA will provide information about available internal and external support options.

D4 Right to Safety and Non-Retaliation

- Interim measures may be implemented to ensure safety and wellbeing (e.g. adjusted reporting lines, leave arrangements).
- Retaliation, victimisation, or intimidation of any party involved in a complaint is strictly prohibited and may result in disciplinary action.

D5 Right to Choose the Complaint Pathway

- Complainants may choose between informal resolution, formal investigation, or external reporting.
- Complaints may be lodged anonymously, in writing, or verbally to a designated officer.
- Complaints may be withdrawn at any stage, although INFA may continue an investigation if risk or legal obligations require it.

D6 Right to Timely Process

- Complaints will be acknowledged within two business days.
- Investigations will be conducted promptly, with regular updates provided to both parties.
- Delays will be communicated with reasons and revised timelines.

D7 Right to Appeal

- Either party may appeal the outcome of a formal investigation within ten business days of receiving the decision.
- Appeals are reviewed by an impartial panel or the Board Chair, depending on the nature of the complaint.

D8 Right to External Recourse

- All parties have the right to seek advice or lodge complaints with external bodies such as the Fair Work Commission, Australian Human Rights Commission, or relevant tribunals.