

Discrimination, Bullying and Harassment Policy

1. Purpose

Greater Western Water (**GWW**) has a zero-tolerance approach to bullying, harassment and victimisation. To this end we are committed to providing a workplace free from discrimination, harassment, bullying, victimisation and to provide a safe, productive, and positive work environment for all employees.

This commitment is based on the need to work together to prevent and eliminate discrimination, harassment, and bullying.

This policy also supports GWW's aim to facilitate an inclusive environment embracing differences in gender, culture, language, sexual orientation, gender identification, age, qualifications, experiences, a person's disability, and difference in approach & opinions.

At GWW we recognise the benefits the above make to our people, our community, and our business.

To the extent that the contents of this policy refer to obligations on GWW, they are guidelines for management or summaries of applicable legislative requirements only and are not contractual terms, conditions, or representations on which a staff member may rely.

2. Objectives

GWW will endeavour to ensure that in the application of all company policies, practices and procedures, no discrimination takes place and that all employees enjoy equal access to opportunities within the organisation. The basis of employment decisions is based on the individual merit of employees.

GWW will also endeavour to ensure that no sexual, racial, or other harassment or bullying occurs in the workplace.

GWW is committed to achieving the following Equal Employment Opportunity (**EEO**) objectives:

- 2.1 To ensure all employees are treated fairly;
- 2.2 To provide a safe, flexible, and respectful work environment for employees and customers free from all forms of discrimination, bullying and sexual harassment;

- 2.3 All GWW employees are required to treat others with dignity, courtesy, and respect;
- 2.4 To keep all policies and procedures consistent with EEO principles; and
- 2.5 To ensure achievement of our objectives through our EEO program which includes the training of employees on EEO and related issues.

3. Scope

This policy applies to:

- 3.1 Board Members;
- 3.2 All GWW staff, including People Leaders; full-time, part-time, temporary, or permanent employees; "in house" contractors & consultants including those engaged through an employment agency; job candidates; student placements, cadets, and volunteers ("You", "You" or "Your");
- 3.3 How GWW provides services to customers and how it interacts with other members of the community;
- 3.4 All aspects of employment, recruitment, and selection; conditions and benefits; training and promotion; task allocation; shifts; hours; leave arrangements; workload; equipment and transport;
- 3.5 On-site, off-site, or after-hours work; work related social functions; work conferences.
- 3.6 Your visits to other workplaces in connection with work;
- 3.7 Your interactions with other staff over the internet (e.g. via social media), including outside of working hours; and
- 3.8 Your treatment of other staff, of clients and of other members of the public encountered in the course of your GWW duties.

4. Roles and Responsibilities

Greater Western Water's responsibilities

Greater Western Water will ensure that this policy is readily accessible and take all reasonable steps to ensure compliance with the policy through its EEO & Inclusion and Diversity Programs.

GWW will endeavour to ensure all complaints are treated seriously, confidentially and managed in a timely and fair manner in accordance with the GWW Discrimination, Bullying and Harassment Guidelines.

It is the responsibility of the Board and Managing Director to ensure that:

- 4.1 All People Leaders understand and are committed to the principles and legislation relating to equal opportunity and applying it in the workplace;
- 4.2 Employment decisions relating to appointment, promotion and career development are determined according to individual merit and the individual's inherent ability to carry out the job;
- 4.3 The organisation has a workplace culture that encourages equal employment opportunity; and
- 4.4 They set an example by their own behaviour.

People Leader responsibilities

All Greater Western Water People Leaders are responsible for taking all reasonable steps to prevent and address all forms of unlawful discrimination, harassment, bullying and victimisation consistent with this policy.

People Leaders must also:

- 4.5 Model appropriate standards of behaviour;
- 4.6 Take steps to educate and make staff aware of their obligations under this policy;
- 4.7 Intervene quickly and appropriately when they become aware of inappropriate behaviour;
- 4.8 Act fairly to resolve issues and enforce workplace behavioural standards, making sure relevant parties are heard;
- 4.9 Help resolve complaints informally;
- 4.10 Refer formal complaints about breaches of this policy to People, Culture & Safety for investigation;
- 4.11 Ensure staff who raise an issue or make a complaint are not victimised;
- 4.12 Ensure that recruitment decisions are based on merit and that no discriminatory requests for information are made; and

- 4.13 Seriously consider and consult on requests for flexible work arrangements.

Staff Rights and Responsibilities

All Greater Western Water staff are responsible for applying this policy, including reporting any potential breach of this policy to a member of the People, Culture and Safety team, a People Leader, an Employee Support Officer, or an employee representative.

You are entitled to:

- 4.14 Recruitment and selection decisions based on merit and not affected by irrelevant personal characteristics;
- 4.15 Work free from discrimination, bullying and sexual harassment;
- 4.16 The right to raise issues or to make an enquiry or complaint in a reasonable and respectful manner without being victimised; and
- 4.17 Reasonable flexibility in working arrangements, especially where needed to accommodate family responsibilities, disability, religious beliefs, or culture.

You must:

- 4.18 Follow the standards of behaviour outlined in this policy;
- 4.19 Treat everyone with dignity, courtesy and respect and offer support to people who experience discrimination, bullying or sexual harassment, including providing information about how to make a complaint; and
- 4.20 Avoid gossip and respect the confidentiality of complaint resolution procedures.

Unacceptable Workplace Conduct

Discrimination, bullying, and harassment are unacceptable at GWW and are unlawful under the following Federal and State legislation:

- *Sex Discrimination Act 1984 (Cth)*
- *Racial Discrimination Act 1975 (Cth)*
- *Disability Discrimination Act 1992 (Cth)*
- *Age Discrimination Act 2004 (Cth)*
- *Australian Human Rights Commission Act 1986 (Cth).*
- *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 (Cth)*

- *Occupational Health and Safety Act 2004 (Vic)*

Any employee, who breaches this policy, knowingly makes false accusations, brings about complaints for malicious, vexatious or frivolous reasons or victimises another employee for making or participating in a legitimate complaint process or is found to have engaged in such conduct may be subject to disciplinary actions by GWW which may include termination of employment.

For (but not limited to) contractors, contingent workers, volunteers, students or other external parties that breach this policy, the association with GWW will be ceased immediately following the relevant provisions of the contractual requirements.

5. References

Other relevant GWW Policies, Procedures & Guidelines:

- 5.1 Code of Conduct
- 5.2 Recruitment Policy
- 5.3 Accessibility Policy
- 5.4 Family Violence Policy
- 5.5 Grievance Guidelines
- 5.6 Employee Counselling Guidelines
- 5.7 EEO Discrimination Bullying and Harassment Guidelines
- 5.8 Relevant Enterprise Agreements

6. Review Process

The Policy will be reviewed every two years or more frequently as required.

Approved by the Board: 27 April 2021

Next review date by the Board: 27 April 2023

7. Version Control Table

Version Number	Author Title	Purpose/ Change	Date
V-4	Workforce Integration Partner	<p>Updates to reflect joint Greater Western Water policy.</p> <p>Updates to reflect 'Staff' inclusive of contingent workers, contractors, volunteers etc.</p> <p>Update to reflect outcomes of breach for non-employees.</p>	April 2021