



Bullying, Harassment & Sexual Harassment Policy

Policy Owner: Director

Applies to: Workers, including employees, casual employees, interpreters, volunteers, contractors, consultants, and representatives acting on behalf of Echo Interpreting.

Effective Date: 29 May 2026

Review Cycle: Every 2 years or as legislation changes or operational requirements change.

1. Purpose

Echo Interpreting is committed to providing a safe, respectful, inclusive, and professional working environment free from bullying, harassment, sexual harassment, discrimination, victimisation, and inappropriate conduct.

Echo Interpreting recognises its responsibility to take reasonable and proactive steps to prevent inappropriate workplace behaviour, respond effectively to concerns, and support a culture of respect and safety.

This policy sets expectations for behaviour, outlines reporting pathways, and supports early intervention, procedural fairness, and compliance with workplace obligations.

2. Scope

This Policy applies to all workers and representatives of Echo Interpreting, including:

- Employees
- Casual employees
- Interpreters
- Volunteers
- Contractors and consultants where applicable
- Management and representatives acting on behalf of Echo Interpreting

This policy applies to all work-related activities, environments, communications, and interactions, including:

- Office-based work
- Interpreting assignments
- Client, community, healthcare, education, legal, government, or third-party locations
- Remote and online work
- Work-related events, meetings, and training activities
- Digital communications, including email, messaging platforms, video meetings, and other online interactions

3. Legislative Framework

This policy is informed by and aligned with relevant legislation and regulatory frameworks, including but not limited to:

- Fair Work Act 2009 (Cth)
- Sex Discrimination Act 1984 (Cth)
- Disability Discrimination Act 1992 (Cth)
- Age Discrimination Act 2004 (Cth)
- Racial Discrimination Act 1975 (Cth)
- Equal Opportunity Act 2010 (Vic)
- Occupational Health and Safety Act 2004 (Vic)
- Occupational Health and Safety Regulations 2017 (Vic)
- Work Health and Safety Acts and Regulations in other Australian jurisdictions, where applicable

4. Definitions

Bullying

Repeated, unreasonable behaviour directed towards a person or group that creates a risk to health and safety.

Bullying may include:

- Intimidation, threats, or humiliation
- Verbal abuse or derogatory comments
- Exclusion or isolation
- Unreasonable work demands

Reasonable management action carried out in a reasonable manner is not bullying.

Harassment

Unwelcome conduct based on a personal attribute (such as sex, disability, race, age, or religion) that offends, humiliates, or intimidates a person.

Sexual Harassment

Sexual harassment is unwelcome conduct of a sexual nature that a reasonable person would anticipate could make another person feel offended, humiliated, or intimidated.

This includes:

- Unwanted physical contact
- Sexual comments, jokes, or gestures
- Requests for sexual favours
- Sharing sexual images or content
- Sexually suggestive messages or communications

Discrimination

Discrimination occurs when a person is treated unfairly or less favourably because of a protected attribute such as disability, age, sex, race, cultural background, religion, gender identity, sexual orientation, family responsibilities, or another attribute protected by law.

5. Commitment to a Safe and Respectful Workplace

Echo Interpreting does not tolerate bullying, harassment, sexual harassment, discrimination, victimisation, or inappropriate workplace conduct.

Concerns will be taken seriously and managed fairly, confidentially, and proportionately.

6. Expected Standards of Behaviour

All workers are expected to contribute to a safe, respectful, inclusive, and professional working environment.

All workers must:

- Treat others with dignity, courtesy, and respect
- Communicate professionally and respectfully in all work-related interactions
- Maintain appropriate personal and professional boundaries
- Consider how their behaviour, actions, and communication may impact others
- Support a workplace culture free from bullying, harassment, sexual harassment, discrimination, victimisation, and inappropriate conduct
- Behave appropriately during face-to-face, remote, online, and digital interactions
- Comply with Echo Interpreting's **Code of Conduct Policy** and related workplace policies

Workers must not:

- Engage in bullying, harassment, sexual harassment, discrimination, victimisation, intimidation, or inappropriate workplace behaviour
- Make inappropriate comments, jokes, gestures, or communications
- Misuse their position, role, influence, or access to information
- Ignore, encourage, or contribute to inappropriate conduct

7. Responsibilities

Echo Interpreting will:

- Take all complaints seriously
- Respond promptly and fairly
- Maintain confidentiality where possible
- Protect individuals from victimisation

- Take appropriate action where misconduct is found

Workers must:

- Comply with this policy
- Not engage in bullying, harassment, sexual harassment, discrimination, victimisation, or inappropriate workplace conduct
- Raise concerns about behaviour that may breach this policy
- Cooperate with complaint resolution, reviews, or investigations where required

8. Reporting and Response

Echo Interpreting encourages workers to raise concerns about bullying, harassment, sexual harassment, discrimination, victimisation, or inappropriate workplace conduct as soon as practicable.

Concerns may be raised:

- Verbally or in writing
- Directly with the Director, Manager, or appropriate Echo Interpreting representative
- Through the Complaints & Feedback process
- With support from another person where appropriate

Echo Interpreting recognises that concerns may be raised by individuals who experience, witness, or become aware of inappropriate conduct.

Reports made in good faith will be taken seriously and managed fairly, respectfully, and without victimisation or retaliation.

Echo Interpreting will:

- Consider the immediate safety and wellbeing of those involved
- Respond promptly and proportionately
- Maintain confidentiality to the extent reasonably practicable
- Ensure procedural fairness
- Assess whether informal or formal action is appropriate
- Take reasonable action to address inappropriate conduct where identified

Complaints and concerns raised under this policy will be managed in accordance with Echo Interpreting's **Complaints & Feedback Policy & Procedure**.

9. Confidentiality and Procedural Fairness

All complaints will be handled:

- Sensitively
- Confidentially (to the extent possible)

- In accordance with principles of procedural fairness

10. False or Malicious Complaints

Complaints made in good faith will not result in negative consequences, even if not substantiated.

Deliberately false or malicious complaints may be treated as misconduct.

11. Breach of Policy

A breach of this policy may result in:

- Disciplinary action
- Removal from assignments
- Termination of employment or engagement
- Referral to external authorities where appropriate
- Legal action where appropriate

12. Related Documents

This policy must be read and applied in conjunction with:

- Code of Conduct Policy
- Complaints & Feedback Policy & Procedure
- Work Health & Safety (WHS) Policy
- Privacy & Confidentiality Policy
- Safeguarding & Incident Management Policy

13. Policy Acknowledgement

All workers are required to acknowledge that they have read, understood, and agree to comply with this Policy.