



Discrimination, Bullying & Sexual Harassment Procedure

All SP Hunters employees, contractors and volunteers (our people) have a right to work in an environment free from discrimination, bullying and sexual harassment.

Purpose

To outline the process by which SP Hunters will ensure the fair and equitable treatment of all our people, with specific regard to areas of discrimination, bullying and sexual harassment. This Procedure will also detail how our people may be supported to resolve concerns in these areas.

Scope

This Procedure applies to all employees, contractors and volunteers (not including volunteers of affiliates). The SP Hunters Discrimination, Bullying and Sexual Harassment Policy should be read in conjunction with this Procedure.

SP Hunters reserve the right to amend this Procedure at any time in line with changing business requirements.

Discrimination

SP Hunters will seek to maintain approaches, processes and systems that support the equal and fair treatment of all our current and future people.

What is discrimination?

Discrimination happens when there is 'adverse action', such as excluding or demoting someone, because of a person's characteristics. Unlawful grounds of discrimination include:

- Age
- Gender
- Political or religious conviction
- Pregnancy / potential pregnancy
- Race, ethnic background and nationality, and that of a relative or associate
- Parental status/family responsibilities
- Marital/de facto status/identity of the spouse
- Sexuality/sexual preference
- Gender identity
- Disability
- Trade union activity / inactivity
- Irrelevant criminal record
- HIV / AIDS

Recruitment and selection

SP Hunters processes for recruitment and selection will be unbiased and encourage application by all people who may be suitable for the role on offer. Interview and selection processes will also aim to minimise unconscious bias and discrimination as much as is possible. We are committed to the following steps, as relevant, to ensure a non-discriminatory recruitment environment:



- Job advertisements written in inclusive language, promoting SP Hunters as a fair and equitable employer
- Use of a variety of screening processes to reduce bias, such as technology, diversity of persons undertaking screening and other activities to ensure a diverse pool of suitable applicants
- Use of psychometric/behavioural assessments where relevant, reference checks, and other resources to obtain a variety of information on applicants and to reduce bias
- Interview panels to be diverse in composition, seeking to minimise bias during the interview process
- An overall focus on culture-add to ensure SP Hunters are engaging the best candidate for the role and the business

General workplace opportunities

SP Hunters will approach the promotion and development of our people in non-discriminatory manner, ensuring that no person is denied an opportunity within our workplace due to discrimination and bias.

Leaders within SP Hunters will work to ensure workplace systems, processes, and ways of working are supportive of, and open to, all our people.

Bullying

SP Hunters believes in providing a safe, positive working experience for all of our people. We will not tolerate bullying behaviour of any kind.

What is bullying?

These examples may constitute bullying when they are offensive to an employee, regardless of any 'innocent intent' on the part of the offender:

- Aggressive behaviour towards a group or individual
- Teasing people in a group or on their own or playing practical jokes that cause humiliation
- Pressuring people or a person to behave inappropriately or in a different way than they would prefer
- Ostracising someone or excluding them from work-related group events without just cause
- Making unreasonable work demands of a group or individuals to the detriment or threat of their career
- Whilst single or isolated occurrences of the above behaviours may appear relatively minor, when continued over an extended period, they can become very wearing or stressful

Workplace conflict is not, on its own, workplace bullying, as not all conflicts have negative health effects. However, conflict may escalate to the point where it becomes workplace bullying.

Leaders have responsibilities to manage and supervise their people, particularly with regard to unsatisfactory performance of duties. A manager can make decisions about poor performance, take disciplinary action, and direct and control the way work is carried out. *Reasonable management action* that is carried out in a reasonable way, consistent with SP Hunters policies and procedures, is not bullying.

If you have any questions about whether an action may be deemed reasonable management action or not, you should speak directly with Human Resources for clarification and support.

Sexual Harassment

Sexual harassment occurs when a person is subjected to unwanted sexual conduct and which makes a person feel offended, humiliated and/or intimidated where that reaction is reasonable in the circumstances. Behaviour or comments which may not offend one person may be unwelcome or offensive to another and therefore may constitute discrimination or harassment.

What is sexual harassment?

These examples may constitute sexual harassment when they are offensive to an employee, regardless of any 'innocent intent' on the part of the offender:

- The public display of pornography (especially where it is directed at particular individuals), ranging from material that might be considered mildly erotic, through to material that is sexually explicit
- Continued use of jokes containing sexual innuendoes, which humiliate or embarrass another person
- Intrusive enquiries into an employee's private life, or in reference to their sexuality or physical appearance
- Persistent requests for interaction outside of work which have been repeatedly rebuffed
- Persistent staring or leering at a person or at parts of their body
- Deliberate and unnecessary physical contact, such as patting, pinching, fondling or deliberate brushing against another body

Employee Responsibilities

- Our people at SP Hunters are expected, when carrying out their duties, to show respect towards all persons
- Our people have a responsibility not to participate in discriminatory, bullying, harassing or victimising behaviour within the workplace and to behave in a respectful, tolerant and equitable manner to all members of the SP Hunters community
- Any person found to be participating in such activity will be subject to SP Hunters disciplinary processes and in some cases, employment may be terminated
- It is expected that any of our people witnessing or experiencing instances of discrimination, bullying or sexual harassment will report this activity to Human Resources or their immediate leader
- Our people should comply with the SP Hunters Grievance Procedure when lodging complaints

Leader Responsibilities

With regard to discrimination, bullying and sexual harassment, leaders at SP Hunters have a particular responsibility to:

- Take reasonably practicable steps to ensure that their workplace is free from discrimination, bullying and sexual harassment, in accordance with SP Hunters Policies and Procedures
- Clearly inform all our people of what is and is not acceptable behaviour, holding all accountable to these standards
- Assist our people to understand the process for reporting any instances, directing them to the SP Hunters Grievance Procedure as required
- Report any observed or reported instances to Human Resources in a prompt manner
- Assist Human Resources as necessary to investigate and resolve any reported instances

Human Resources Responsibilities

With regard to discrimination, bullying and sexual harassment, Human Resources have a particular responsibility to:

- Educate, support and coach leaders and our people on discrimination, bullying and sexual harassment topics and processes
- Implement people processes that reduce bias and ensure fair and equitable treatment for all
- Confidentially manage any reported instances in line with SP Hunters Policies and Procedures, including facilitating investigations as required
- Resolve instance in line with findings, including invoking disciplinary action as required

Reporting Instances of Discrimination, Bullying and Sexual Harassment

Complaints of discrimination, bullying and sexual harassment will be treated seriously by SP Hunters and will be managed promptly in a thorough and confidential manner, in accordance with the SP Hunters Grievance Procedure. The principles of natural justice and confidentiality will apply.

People wishing to lodge a complaint are requested to do so in accordance with the SP Hunters Grievance Procedure and are also encouraged to speak directly with Human Resources at any time. In summary the process may include:

- Self-resolution – although this is less likely to be an option for instances of discrimination, bullying and sexual harassment
- Formal reported grievance
- Investigation
- Appeal process
- Disciplinary action

Mr Stan Joyce

Chairman

Papua New Guinea Hunters Rugby
Football Club Limited

Mr Jeremy Edwards

Director/Secretary

Papua New Guinea Hunters Rugby
Football Club Limited