
PEOPLE AND CULTURE POLICY

Equal Opportunity, Anti-Discrimination, Bullying and Harassment Policy

A workplace where every person is safe, respected and treated fairly

Version 1.0 - July 2026

Policy owner	Board of Directors, THRIV3 (Indigenous Corporation)
Responsible officer	Chief Executive Officer
Applies to	Directors, members, the CEO, employees, volunteers, contractors, students on placement and agency workers of THRIV3 (together, THRIV3 People)
Effective date	July 2026
Next review	July 2027 (or earlier if legislation or funding conditions change)
Related documents	Code of Conduct; Grievance and Complaints Policy; Gender Equality, Inclusion and Diversity Policy; Work Health and Safety Policy

1. Purpose and Scope

THRIV3 (Indigenous Corporation) is committed to providing an environment that is free from discrimination, bullying, harassment, sexual harassment, victimisation and vilification. This policy explains the behaviour we prohibit, the positive duty we hold, and what happens when concerns are raised.

This policy applies to all THRIV3 People: Directors, members acting for the corporation, the CEO, employees, volunteers, contractors, students on placement and agency workers. It covers conduct at any workplace, on Country, at community and social events, when travelling for THRIV3, and online (including social media and messaging apps) where the conduct is connected to THRIV3.

2. Equal Opportunity

THRIV3 makes decisions about recruitment, engagement, training, promotion and other opportunities on merit: the person's skills, qualifications, experience and suitability for the role. As an Aboriginal-led organisation, THRIV3 may lawfully use special measures, including identified positions for Aboriginal and Torres Strait Islander people, to achieve substantive equality. Special measures are not discrimination.

3. Discrimination

Discrimination means treating a person less favourably because of a protected attribute, or applying a requirement that disadvantages people with a protected attribute where the requirement is not reasonable. Protected attributes under Commonwealth and NSW law include:

- race, colour, descent, national or ethnic origin, and immigration status
- sex, sexual orientation, gender identity and intersex status
- age, disability (including physical, intellectual, psychiatric and learning disability, and disease), and physical features
- marital or relationship status, pregnancy, breastfeeding, family and carer responsibilities
- religious belief or activity, political belief or activity, industrial activity, and criminal record in some circumstances.

Both direct and indirect discrimination are prohibited in every aspect of work at THRIV3, from advertising a role through to ending an engagement.

4. Sexual Harassment and Our Positive Duty

Sexual harassment is any unwelcome sexual advance, request for sexual favours, or other unwelcome conduct of a sexual nature that a reasonable person would anticipate might offend, humiliate or intimidate. It includes unwelcome touching, staring or leering, sexual comments or jokes, intrusive questions, sexually explicit messages or images, and repeated unwanted invitations.

Under the Sex Discrimination Act 1984 (Cth), THRIV3 holds a positive duty to take reasonable and proportionate measures to eliminate, as far as possible, sexual harassment, sex discrimination, sex-based harassment, hostile workplace environments and related victimisation. We do not wait for complaints. We actively assess risk, train our people, monitor our culture and act on early warning signs.

5. Bullying

Workplace bullying is repeated unreasonable behaviour directed towards a person or group that creates a risk to health and safety. Examples include abusive or belittling language, deliberate exclusion, spreading malicious rumours, unreasonable work demands and cyber-bullying.

Reasonable management action carried out in a reasonable way is not bullying. This includes fair performance management, allocation of work, rostering decisions and disciplinary processes conducted properly.

6. Victimisation and Vilification

Victimisation means subjecting a person to a detriment because they raised a concern, made a complaint, or assisted with an investigation. Vilification means public conduct that incites hatred, serious contempt or severe ridicule of a person or group because of an attribute such as race. Both are prohibited and are treated as seriously as the conduct originally complained about.

7. Raising a Concern

If you experience or witness discrimination, bullying, harassment or sexual harassment:

- where you feel safe to do so, you may tell the person their behaviour is unwelcome and ask them to stop
- report the matter to your manager or supervisor, the CEO, or (if the concern involves the CEO) the Board Chair
- formal complaints are handled under the Grievance and Complaints Policy: promptly, impartially and as confidentially as possible.

No one will be disadvantaged for raising a concern in good faith. External avenues are always available, including the Fair Work Commission, the Australian Human Rights Commission, Anti-Discrimination NSW and SafeWork NSW.

8. Breaches of this Policy

Substantiated breaches will result in action proportionate to the conduct. For employees this may include counselling, a warning, demotion or dismissal (including summary dismissal for serious misconduct). For volunteers, contractors and agency workers, the engagement may be ended. For Directors, the Board deals with the matter under the Rule Book. Serious matters may also be reported to the police or a regulator.

9. Responsibilities and Review

The Board sets the standard and oversees the positive duty. The CEO ensures training at induction and regularly afterwards, risk assessment of harassment hazards, and fair handling of reports. Managers act early, model respectful behaviour and never ignore concerns. Every THRIV3 person treats others with respect and reports conduct that falls short.

Board adoption

This policy was adopted by the Board of Directors of THRIV3 (Indigenous Corporation) and takes effect from the date recorded below. It will be reviewed at least every 12 months, and earlier if legislation, ORIC or ACNC requirements, or funding conditions change.

Adopted on: 25/07/2026