



BULLYING, HARASSMENT & DISCRIMINATION POLICY

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1. Purpose

Highlight Security is committed to providing a safe, inclusive and respectful working environment in which all people are treated fairly and with dignity.

Bullying, discrimination, harassment, sexual harassment, sex-based harassment, victimisation, vilification and other harmful workplace conduct are unacceptable and will not be tolerated.

This policy establishes:

- the behavioural standards expected of persons working for or representing Highlight Security;
- the types of conduct that are prohibited;
- responsibilities for preventing and addressing inappropriate behaviour;
- the process for raising and responding to concerns; and
- the possible outcomes where this policy is breached.

Highlight Security will take reasonable and proportionate steps to prevent unlawful workplace conduct before it occurs and will respond appropriately when concerns are identified.

2. Scope

This policy applies to all Highlight Security:

- Directors;
- managers and supervisors;
- employees and casual workers;
- contractors and subcontractors;
- work-experience participants and trainees; and
- other persons authorised to perform work or represent the company.

The policy applies to conduct involving:

- colleagues and supervisors;
- clients and client representatives;
- contractors and suppliers;
- members of the public;
- visitors; and
- any other person encountered in connection with work.

Highlight Security will also take reasonable steps to address inappropriate conduct directed towards its workers by clients, patrons, members of the public or other third parties.

3. When the Policy Applies

This policy applies wherever there is a relevant connection to work, including:

- Highlight Security and client workplaces;
- security assignments and events;
- training, inductions and meetings;
- work-related travel;
- company or client functions;
- accommodation provided for work;
- telephone, radio and electronic communications;
- messaging applications and group chats;
- email and social media; and
- conduct outside ordinary working hours that affects the workplace, another worker, a client or Highlight Security's legitimate business interests.

Bullying and harassment may occur in person, remotely, online or through written or electronic communications. SafeWork NSW identifies bullying and harassment as workplace health and safety risks that can arise at usual workplaces, remote locations, work events and through phones, email and social media.

4. Equal Employment Opportunity

Highlight Security makes employment-related decisions based on legitimate business requirements, merit, qualifications, skills, conduct, performance and the inherent requirements of the role.

Equal employment opportunity applies throughout the employment relationship, including:

- recruitment and selection;
- allocation of shifts and assignments;
- training and development;
- remuneration and workplace benefits;
- promotion and transfer;
- performance management;
- disciplinary processes;
- workplace adjustments; and
- termination of employment or engagement.

Workers and applicants must not be treated less favourably because of an irrelevant personal characteristic protected by applicable law.

5. Discrimination

Discrimination may be direct or indirect.

Direct discrimination

Direct discrimination occurs where a person is treated less favourably because they have, are assumed to have, or are associated with someone who has a protected characteristic.

Indirect discrimination

Indirect discrimination may occur where a rule, condition or requirement applies to everyone but unreasonably disadvantages people with a protected characteristic.

NSW law recognises both direct and indirect discrimination. A requirement that appears neutral may be indirectly discriminatory where it unfairly disadvantages a protected group and is not reasonable in the circumstances.

Protected characteristics may include, but are not limited to:

- race, colour, nationality, descent or ethnic origin;
- sex;
- pregnancy or potential pregnancy;
- breastfeeding;
- age;
- disability, illness or impairment;
- marital or domestic status;
- family or carer responsibilities;
- sexual orientation;
- gender identity or transgender status;
- intersex status or variations of sex characteristics;
- religion or religious belief;
- political opinion;
- national extraction or social origin;
- industrial activity or association;
- medical history;
- an association with a person who has a protected characteristic; and
- any other characteristic protected under applicable Commonwealth or NSW law.

NSW employment protections expressly include disability, sex, pregnancy, breastfeeding, race, age, marital or domestic status, homosexuality, transgender status and carer responsibilities.

Discrimination may include:

- refusing shifts or opportunities for an unlawful reason;
- making employment decisions based on stereotypes;
- applying unreasonable rules that disadvantage a particular group;
- refusing a reasonable workplace adjustment without proper consideration;

- excluding someone from training or promotion because of a protected characteristic; or
- dismissing, demoting or disadvantaging a person for a discriminatory reason.

6. Harassment

Harassment is unwelcome conduct that offends, humiliates, intimidates or degrades another person.

Harassment may:

- be a single incident or repeated behaviour;
- be verbal, physical, written, visual or electronic;
- occur even if the person responsible did not intend to cause harm; and
- involve conduct directed at a person because of an actual or assumed personal characteristic.

The person affected is not required to confront the person responsible or expressly state that the behaviour is unwelcome before raising a concern.

Examples may include:

- offensive jokes, comments or gestures;
- insults or derogatory remarks;
- mocking a person's accent, culture, religion, disability or appearance;
- displaying or distributing offensive material;
- aggressive or intimidating behaviour;
- unnecessary or unwelcome physical contact;
- practical jokes directed at a person or group;
- deliberately excluding someone for an improper reason;
- intrusive questions about a person's private life;
- offensive messages, images, recordings or online posts; or
- threatening, humiliating or degrading conduct.

7. Sexual Harassment

Sexual harassment includes:

- an unwelcome sexual advance;
- an unwelcome request for sexual favours; or
- other unwelcome conduct of a sexual nature.

Sexual harassment may be a single incident and does not need to be repeated. The Fair Work Act protects workers and others from unwelcome sexual advances, requests for sexual favours and other unwelcome sexual conduct connected with work.

Examples may include:

- unwelcome touching, hugging, kissing or physical contact;

- sexually suggestive comments or jokes;
- intrusive questions about a person's body, relationships or sex life;
- requests or pressure for dates or sexual activity;
- staring, leering or suggestive gestures;
- displaying or sending sexual images or messages;
- sexualised comments about appearance or clothing;
- unwanted repeated invitations after a person has declined;
- exposing another person to sexual material;
- offering workplace benefits in exchange for sexual conduct;
- threatening a disadvantage for rejecting sexual conduct;
- indecent exposure; or
- sexual assault.

Some conduct may also constitute a criminal offence and may be reported to police.

8. Sex-Based Harassment and Hostile Workplace Environments

Sex-based harassment is unwelcome conduct of a demeaning nature because of a person's sex or a characteristic generally associated with a person of that sex.

Examples may include:

- sexist remarks or jokes;
- gender-based insults or stereotypes;
- comments that a person is unsuitable for security work because of their sex;
- repeatedly undermining a person because of their gender;
- degrading comments about pregnancy, breastfeeding or family responsibilities; or
- excluding or belittling someone because of their sex.

Conduct may also create a workplace environment that is hostile on the ground of sex, even where it is not directed at a particular person. This may include a workplace culture containing repeated sexualised conversations, sexist material, degrading comments or gender-based hostility.

Highlight Security has a positive duty to take reasonable and proportionate steps to eliminate, as far as possible, workplace sex discrimination, sexual harassment, sex-based harassment, hostile workplace environments on the ground of sex and related victimisation.

9. Workplace Bullying

Workplace bullying occurs where a person or group repeatedly behaves unreasonably towards a worker or group of workers and that behaviour creates a risk to health and safety.

Bullying may include repeated:

- abusive, insulting or offensive language;
- aggressive or intimidating conduct;
- belittling or humiliating comments;

- unjustified criticism;
- deliberately withholding information needed to perform work;
- excluding a person from necessary workplace activities;
- spreading malicious rumours;
- setting unreasonable or deliberately impossible work demands;
- threatening a person's employment without justification;
- interfering with or sabotaging another person's work;
- inappropriate initiation practices;
- misuse of authority; or
- online abuse or harassment.

A single incident of unreasonable behaviour may not meet the legal definition of workplace bullying but may still breach this policy and require action.

10. Reasonable Management Action

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

This may include:

- giving lawful and reasonable directions;
- allocating work, shifts or client assignments;
- setting reasonable performance standards and deadlines;
- providing constructive feedback;
- addressing misconduct or underperformance;
- investigating workplace concerns;
- implementing disciplinary action;
- changing operational arrangements;
- refusing a promotion or preferred assignment for legitimate reasons;
- managing attendance or fitness-for-work concerns; or
- ending employment or engagement through a lawful and fair process.

Management action may become unreasonable where it is carried out in a humiliating, threatening, discriminatory or procedurally unfair manner.

11. Vilification

Vilification is a public act that incites or encourages hatred, serious contempt or severe ridicule towards a person or group because of a protected characteristic.

Vilification may occur through:

- public statements;
- social-media posts;
- signs, posters or written material;
- group messages;
- gestures or verbal conduct; or

- distributing offensive images or recordings.

Vilification is prohibited and may also be unlawful.

12. Victimisation and Retaliation

Highlight Security prohibits victimisation, retaliation or disadvantage against a person because they:

- raised or intended to raise a concern;
- made a complaint;
- supported another person making a complaint;
- participated in an investigation;
- acted as a witness;
- sought assistance from a union, adviser, regulator or authority; or
- exercised a lawful workplace right.

Victimisation may include:

- threatening a person;
- reducing or withholding shifts as punishment;
- excluding or isolating the person;
- spreading rumours;
- intimidating witnesses;
- treating the person less favourably;
- interfering with their work; or
- pressuring them to withdraw a complaint.

Victimisation may result in disciplinary or contractual action regardless of whether the original complaint is substantiated.

13. Responsibilities

Directors and Management

Highlight Security's Directors and management are responsible for:

- approving and supporting this policy;
- taking reasonable steps to prevent unlawful and harmful workplace behaviour;
- ensuring accessible reporting options are available;
- responding to concerns promptly and appropriately;
- providing information, instruction and training where required;
- ensuring procedural fairness;
- managing conflicts of interest in complaint handling;
- taking reasonable action to protect affected persons;
- considering psychosocial hazards when designing and managing work; and
- reviewing workplace risks, complaints and corrective actions.

Managers and Supervisors

Managers and supervisors are responsible for:

- modelling respectful and professional behaviour;
- communicating expected workplace standards;
- addressing inappropriate behaviour they observe or become aware of;
- taking reports seriously;
- not attempting to discourage a complaint;
- escalating complaints to appropriate management;
- maintaining privacy and avoiding workplace gossip;
- implementing interim safety measures where required;
- cooperating with investigations; and
- ensuring workers are not victimised.

A supervisor who witnesses serious inappropriate conduct should not wait for a formal complaint before taking reasonable action.

Workers and Contractors

Workers and contractors must:

- treat others with dignity, fairness and respect;
- comply with this policy and the Code of Conduct;
- not engage in bullying, harassment, discrimination, vilification or victimisation;
- follow reasonable directions intended to prevent harmful behaviour;
- report serious conduct or immediate safety concerns;
- cooperate honestly with complaint and investigation processes;
- maintain appropriate confidentiality; and
- avoid making knowingly false or malicious allegations.

14. Conduct by Clients and Members of the Public

Workers may experience bullying, harassment, discrimination, sexual harassment or abuse from clients, patrons, visitors or members of the public.

Workers should:

- prioritise their immediate safety;
- use approved de-escalation and incident-response procedures;
- disengage or seek assistance where necessary;
- report the conduct to their supervisor or management; and
- complete an incident report where required.

Depending on the circumstances, Highlight Security may:

- raise the matter with the client;

- change the worker's duties or reporting arrangements;
- provide additional supervision or support;
- remove a worker from an unsafe situation;
- require the third party to comply with behavioural expectations;
- suspend or cease services where appropriate; or
- refer the matter to police or another authority.

A worker will not be expected to tolerate unlawful, abusive or unsafe conduct merely because the person responsible is a client or member of the public.

15. Raising a Concern

A person may raise a concern about conduct they have experienced, witnessed or reasonably believe has occurred.

Concerns may be reported to:

- the person's immediate supervisor or manager;
- any Highlight Security Director who is not involved in the matter; or
- a designated confidential reporting email address accessible only to authorised Directors.

Where a concern involves a Director, manager or the person who ordinarily receives reports, it may be raised with another Director who is not involved in the matter.

A report may be verbal or written. Providing the following information may assist:

- what occurred;
- when and where it occurred;
- who was involved;
- any witnesses;
- relevant messages, records or other evidence;
- whether the conduct is continuing; and
- any immediate safety or support needs.

A person does not need complete evidence before raising a genuine concern.

Anonymous reports may be considered, although anonymity can limit the company's ability to investigate or provide procedural fairness.

16. Informal Resolution

Where appropriate, a concern may be addressed informally through:

- discussing the conduct with the person responsible;
- asking a supervisor or manager to intervene;
- facilitated discussion;
- mediation;

- clarification of expected behaviour;
- counselling or coaching; or
- agreed workplace arrangements.

A person is **not required** to approach the other party directly where they do not feel safe or comfortable doing so.

Informal resolution may be unsuitable where:

- the conduct is serious;
- sexual harassment or violence is alleged;
- there is a significant power imbalance;
- the behaviour is repeated;
- there is a risk of victimisation;
- the person responsible denies the conduct; or
- formal investigation is otherwise necessary.

Highlight Security may decide that formal action is required even where the person raising the concern prefers an informal response, particularly where other workers may be at risk.

17. Initial Assessment and Interim Measures

After receiving a concern, Highlight Security will assess:

- the nature and seriousness of the allegations;
- immediate health and safety risks;
- whether emergency or medical assistance is required;
- whether the matter may involve criminal conduct;
- the preferred resolution of the person raising the concern;
- whether informal resolution is appropriate;
- whether an investigation is required;
- any conflict of interest; and
- whether an external investigator or adviser should be engaged.

Temporary measures may include:

- changing reporting lines or contact arrangements;
- separating parties during shifts;
- temporarily changing duties, locations or rosters;
- directing parties not to contact one another;
- arranging supervision;
- preserving relevant evidence;
- providing access to support;
- suspending a person from duties where appropriate; or
- taking other reasonable steps to manage safety and integrity of the process.

Interim measures are not a finding of wrongdoing and will not be treated as disciplinary action unless separately determined. Where reasonably practicable, Highlight Security will implement interim arrangements in a way that minimises unnecessary disadvantage to any party, particularly the person who raised the concern.

18. Formal Investigation

Where a formal investigation is required, Highlight Security will seek to ensure that it is:

- impartial;
- appropriately confidential;
- timely;
- based on available evidence;
- free from predetermined conclusions; and
- consistent with procedural fairness.

Wherever reasonably practicable, the person managing or investigating the complaint will not be directly involved in the allegations and must be able to act impartially. Where a complaint involves a Director, presents an actual or perceived conflict of interest, or is particularly serious, sensitive or complex, Highlight Security may appoint an independent external investigator or adviser.

The process may involve:

1. Confirming the allegations to be investigated.
2. Advising the respondent of the substance of the allegations.
3. Giving the respondent a reasonable opportunity to respond.
4. Interviewing the complainant, respondent and relevant witnesses.
5. Reviewing records, messages, footage, reports or other evidence.
6. Allowing a support person at formal meetings where reasonable.
7. Considering all relevant information.
8. Making findings on the balance of probabilities.
9. Determining appropriate actions or recommendations.
10. Advising the parties of the outcome to the extent appropriate.

Highlight Security may engage an independent investigator, mediator, legal adviser or other specialist where the matter is serious, sensitive or complex.

No fixed timeframe can apply to every matter. The parties will be provided with reasonable updates where an investigation is ongoing.

19. Confidentiality and Privacy

Information relating to a complaint will be shared only with persons who reasonably need it to:

- assess or investigate the matter;
- provide procedural fairness;
- manage workplace safety;

- obtain professional advice;
- implement an outcome; or
- comply with a legal obligation.

Complete confidentiality cannot be guaranteed because relevant allegations may need to be put to the respondent and witnesses may need to be interviewed.

All participants must avoid:

- discussing the matter unnecessarily;
- spreading workplace rumours;
- contacting or pressuring witnesses;
- destroying or altering evidence; or
- using complaint information for an improper purpose.

This section does not prevent a person from confidentially seeking support or advice from a support person, union, legal adviser, health professional, regulator or authority.

20. Outcomes

Where a complaint is substantiated, action may include:

- an apology;
- counselling, coaching or additional training;
- a direction to cease the behaviour;
- changes to workplace or reporting arrangements;
- formal warning;
- removal from a site or assignment;
- disciplinary action;
- suspension from duties;
- termination of employment or engagement;
- termination of a contractor or supplier relationship;
- remedial action to address workplace risks; or
- referral to police, a regulator or another authority.

The outcome will depend on:

- the seriousness and frequency of the conduct;
- its impact;
- whether it was deliberate;
- any prior conduct;
- the person's response;
- the need to protect workers and others; and
- applicable legal and contractual requirements.

Highlight Security may also implement broader measures such as training, revised supervision, changes to work design or improved reporting arrangements.

21. Complaints That Are Not Substantiated

A complaint not being substantiated does not necessarily mean it was false or made improperly.

Where a complaint cannot be substantiated:

- the available evidence and reasons for the outcome will be considered;
- the parties may be advised of the outcome to the extent appropriate;
- workplace relationships and safety risks may continue to be monitored;
- support or workplace adjustments may still be offered; and
- no disciplinary action will be taken against the complainant merely because the allegation could not be proven.

Action may be taken where there is reliable evidence that a person knowingly made a false, malicious or deliberately misleading complaint.

A complaint made honestly, even if mistaken or unsubstantiated, will not itself constitute misconduct.

22. Recordkeeping

Highlight Security will keep appropriate records of:

- complaints received;
- initial assessments;
- evidence and interview notes;
- investigation findings;
- interim measures;
- decisions and outcomes; and
- corrective actions.

Records will be stored securely with access limited to persons who reasonably require it.

Complaint and investigation records may be kept separately from general personnel records where appropriate.

23. External Assistance

Nothing in this policy prevents a person from seeking assistance from:

- a union or employee representative;
- a legal adviser;
- the Fair Work Ombudsman;
- the Fair Work Commission;
- the Australian Human Rights Commission;
- Anti-Discrimination NSW;
- SafeWork NSW;
- police; or

- another appropriate regulator or support service.

A person is not required to complete Highlight Security's internal process before obtaining external advice or making an external report.

24. Breaches of This Policy

A breach of this policy may result in:

- counselling or further instruction;
- additional training;
- formal disciplinary action;
- removal from a site or assignment;
- suspension from duties;
- termination of employment or engagement;
- termination of a supplier or contractor relationship; or
- referral to an external authority.

Serious misconduct may result in termination without notice, subject to an appropriate investigation, procedural fairness and applicable law.

25. Related Documents

This policy should be read with:

- Highlight Security Code of Conduct;
- Human Rights Policy;
- Workplace Health and Safety Policy;
- Fitness for Work Policy;
- Incident, Injury, Hazard and Near-Miss Reporting Procedure; and
- applicable employment, contractor and client-site requirements.

26. Policy Review

This policy is owned by the Managing Director and approved by the Directors of Highlight Group Pty Ltd.

It will be reviewed at least every two years or earlier following:

- legislative or regulatory changes;
- a significant complaint or incident;
- changes to company operations;
- recommendations arising from an investigation;
- client or industry requirements; or
- identification of a gap in the policy.

This policy does not form part of any person's contract of employment or engagement and may be amended by Highlight Security from time to time.

Signed: 

Name: Ertaza Arif

Title: Managing Director

Date: 1 August 2026



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