Aspire2 Group Harassment/Bullying Prevention Policy

Category:	People, Culture & Conduct			
Responsibility:	Group Chief Executive Officer			
Approval:	Aspire2 Board			
Policy Number: 9Group	Policy Version: 5	Date Created: Jun 2017	Review Date: September 2026	Next Review: March 2027

1. Purpose

1.1. Aspire2 Group is committed to workplaces and learning environments free from bullying, harassment, sexual harassment, unlawful discrimination and victimisation.

1.2. This policy establishes Group-level prevention and response expectations. Bullying and harassment may also create psychosocial health and safety risks and will be managed alongside relevant health and safety duties.

2. Scope

2.1. This policy applies across Aspire2 Group and its organisations to employees, learners, contractors and consultants, volunteers, Board members, visitors, clients and partner organisations, as relevant to their relationship with Aspire2 Group.

2.2. It applies to workplaces and learning environments, work-related or Group activities and events, work-related travel, digital communications, and conduct outside normal hours where there is a sufficient connection to Group activities or the workplace or learning environment.

3. Definitions

3.1. Bullying is repeated and unreasonable behaviour directed towards a worker or group of workers that can lead to physical or psychological harm. A single incident is not workplace bullying, although it may still be inappropriate, harmful or serious and may be addressed under another policy or process.

3.2. Harassment includes unwelcome or offensive conduct that may be unlawful under New Zealand law or otherwise inconsistent with Aspire2 Group standards. Sexual and racial harassment have specific legal definitions and may arise from a single incident or a pattern of conduct, depending on the circumstances and applicable law.

3.3. Discrimination means treating a person unlawfully or less favourably on a prohibited ground in circumstances covered by New Zealand law. Victimisation or retaliation for raising a concern, supporting another person or participating in a process is not acceptable.

3.4. Reasonable management action carried out in a reasonable manner - such as lawful instructions, performance feedback, performance management, organisational change or disciplinary processes - is not bullying merely because it is unwelcome or difficult.

4. Prevention and responsibilities

4.1. The Group Chief Executive Officer has overall responsibility for Group-level oversight and for ensuring material or systemic issues are escalated appropriately.

4.2. Organisation CEOs/GMs and senior leaders must ensure proportionate arrangements are in place to prevent and respond to bullying, harassment, sexual harassment, discrimination and victimisation, including accessible reporting pathways and fair processes.

4.3. Managers and leaders are expected to model respectful behaviour, respond appropriately

when concerns are raised or observed, and take reasonable steps to manage psychosocial risks arising from workplace behaviour.

4.4. Everyone covered by this policy is expected to treat others with dignity and respect, refrain from prohibited conduct and cooperate appropriately with any process used to address concerns.

5. Raising and responding to concerns

5.1. People should have more than one appropriate pathway for raising concerns. Depending on the organisation and circumstances, this may include a manager, another senior leader, People and Culture/HR, a health and safety channel, the relevant CEO/GM or the Group Chief Executive Officer.

5.2. Concerns will be assessed and addressed in a manner appropriate to their nature and seriousness. Options may include early or informal resolution where appropriate and agreed, or a formal review or investigation where required.

5.3. Any formal process will be conducted fairly and impartially, with appropriate regard to natural justice, privacy, confidentiality, cultural considerations and the wellbeing and safety of those involved. Confidentiality cannot be guaranteed where disclosure is required to address the concern fairly, safely or lawfully.

5.4. Interim measures may be used where reasonably necessary to manage safety, wellbeing, integrity of a process or operational risks. Interim measures are not findings of wrongdoing.

5.5. Where concerns are substantiated, appropriate action may be taken under the applicable employment, learner, contractor or other process. Outcomes will depend on the circumstances and this policy does not predetermine disciplinary action.

5.6. Nothing in this policy prevents a person from seeking independent advice or using an external statutory or regulatory avenue available to them.

6. Relationship with other policies

6.1. 22Group Workplace Behaviour Policy sets the overarching standards of conduct. 21Group Diversity and Inclusion Policy addresses proactive inclusion and equity. 17Group Workplace Violence Prevention Policy applies where conduct involves violence, aggression or a credible threat to safety. Where more than one policy is relevant, the matter may be managed under the pathway best suited to the primary issue and risks.

7. Review

7.1. This policy will be reviewed annually and earlier where there is a material legislative, regulatory or organisational change, a significant incident or concern, or evidence that the policy is not operating effectively.

Relevant Legislation

- Health and Safety at Work Act 2015
- Employment Relations Act 2000, including provisions relating to personal grievances and sexual harassment
- Human Rights Act 1993
- Privacy Act 2020
- Harassment Act 1997 (where applicable)
- WorkSafe New Zealand guidance on bullying and psychosocial risks
- Employment New Zealand guidance on bullying and harassment at work

Related Documents

- 17Group Workplace Violence Prevention Policy

- 21Group Diversity and Inclusion Policy
- 22Group Workplace Behaviour Policy
- 20Group Privacy Policy
- Relevant organisation complaints, employment, learner and investigation procedures