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# **BULLYING, HARASSMENT AND DISCRIMINATION POLICY**

## **RIMPA GLOBAL**

RECORDS AND INFORMATION MANAGEMENT  
PRACTITIONERS ALLIANCE

Advancing and Connecting the Records and Information  
Management Profession.

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## 1 Document Control

VERSION	DATE	AUTHORS	APPROVAL	COMMENTS
1.0	20 February 2021	Janine Morris	RIMPA Global Board	
2.0	30 January 2023	Anne Cornish	RIMPA Global Board	
2.01	1 March 2026	Anne Cornish	CEO	Review
3.0	20 May 2026	Anne Cornish	CEO	Approved

## 2 Effective Date, Review, and Amendments

- a. This policy is effective from 20 February 2021 and is reviewed every three years.
- b. This policy may be amended, varied, or modified by the Records and Information Management Practitioners Alliance Global (RIMPA Global) Board.

## 3 Related Policies, Procedures, or Documents

NUMBER	POLICY NAME	INTERNAL OR EXTERNAL
1.0	Code of Professional Conduct	External
2.0	Complaints & Grievance Policy	External
3.0	Governance Framework	Internal

## 4 Introduction

RIMPA Global acknowledges that good governance is fundamental to our organisation's success. Our policies and policy framework is designed to enable our people to contribute effectively to achieving RIMPA Global's objectives, enhancing our reputation, improving the member experience, and attaining sustainable business outcomes.

## 5 Purpose

RIMPA Global has a legislative duty of care to ensure, as reasonably practicable, the health and safety of all workers and volunteers including physical safety and mental health.

An important part of this commitment is to ensure RIMPA Global's environment is free from harassment, bullying, discrimination and victimisation.

RIMPA Global does not condone any form of harassment, bullying, discrimination and victimisation.

This policy describes the expected behaviour of employees, volunteers and members to ensure RIMPA Global can provide a safe, flexible, positive and respectful environment. Such behaviours are aligned with the principles upheld in the Code of Professional Conduct.

RIMPA Global maintains a Sexual Harassment Prevention Plan, which forms Appendix A to this Policy and outlines the measures implemented to prevent sexual harassment and sex-based harassment.

## 6 Scope and Audience

This policy applies to, and must be adhered to by:

- Board members
- RIMPA Global members
- RIMPA Global employees
- RIMPA Global partners
- RIMPA Global community subscribers
- RIMPA Global customers
- RIMPA Global volunteers.

This policy applies to any conduct that:

- Takes place at or in connection with a RIMPA Global related activity, workshop, meeting, function, conference or event
- Involves all forms of communication (including in person, by phone, cameras, social media, email, SMS communication or any other means)

- Occurs in connection with RIMPA Global employees, members, volunteers or people associated with RIMPA Global.

Breaches of this policy will be managed in accordance with the Complaints and Grievance Policy.

This policy is an internal policy. This policy will be published on RIMPA Global’s externally facing website.

## 7 Definitions

Phrase	Definition
Board	The Board of Directors of RIMPA Global.
Bullying	Repeated and unreasonable behaviour directed towards a person or group that creates a risk to health and safety.
CEO	The Chief Executive Officer of RIMPA Global or their delegated representative.
Company	Records and Information Management Practitioners Alliance Global (RIMPA Global).
Complaint	A concern or information complaint which refers to any accusation or allegation.
Complainant	A person who raises a complaint or concern under this Policy.
Contractor	A person or organisation engaged by RIMPA Global to provide services under a contract.
Director	A person elected or appointed to the Board of RIMPA Global in accordance with the Constitution.
Discrimination	Treating a person unfairly or less favourably because of a protected attribute under applicable anti-discrimination legislation.
Employee	A person formally employed by RIMPA Global.
Harassment	Unwelcome behaviour that intimidates, humiliates, or offends a person, and that a reasonable person would anticipate may cause offence, humiliation, or intimidation.
Member	A person who has a specific membership with RIMPA Global, whose name appears on the register of members.
Membership	The status of being formally admitted as a member of RIMPA Global in accordance with the Constitution and Membership Policy.
Protected Attribute	A personal characteristic protected by law, including age, race, sex, disability, religion, sexual orientation, gender identity, pregnancy, marital status, and family responsibilities.



Phrase	Definition
Reasonable Management Action	Lawful and reasonable actions taken by management, such as performance management, disciplinary action, or organisational change.
Respondent	The person whose conduct is the subject of a complaint.
RIMPA Global	Records and Information Management Practitioners Alliance Global.
Sexual Harassment	Unwelcome conduct of a sexual nature that a reasonable person would anticipate may offend, humiliate, or intimidate another person.
Sex-Based Harassment	Unwelcome conduct of a demeaning nature based on a person’s sex, where a reasonable person would anticipate the conduct may offend, humiliate, or intimidate.
Victimisation	Subjecting, or threatening to subject, a person to detriment because they made, intend to make, or assisted with a complaint or investigation.
Volunteer	A person who provides services to RIMPA Global without receiving payment.
Workplace	Any physical or virtual environment where RIMPA Global business or activities are conducted, including offices, meetings, conferences, travel, online platforms, and social events.

## 8 Principles

The following principles support the provision of a safe, flexible, positive and respectful environment:

- Promote an environment free from bullying, harassment, discrimination or victimisation
- Treat other with courtesy dignity and respect
- Treat complaints of bullying, harassment, discrimination or victimisation with sensitively, fairly, promptly, confidentially and in accordance with the Complaints and Grievance Policy
- Always promote appropriate standards of conduct.

## 9 Unacceptable Behaviour

Unacceptable behaviour includes harassment, bullying, discrimination and victimisation.

### 9.1 Bullying

Bullying is the repeated and unreasonable behaviour directed towards a person or group of people that creates a risk to health and safety that may be direct or indirect.

Unreasonable behaviour includes victimising, humiliating, intimidating or threatening behaviour. Whether a behaviour is unreasonable may depend on whether a reasonable person might see the behaviour as unreasonable in the circumstances.

Bullying can be physical, verbal or written.

Bullying includes behaviours such as:

- Offensive language or insults
- Belittling opinions or unjustified criticism or excessive scrutiny
- Spreading misinformation or malicious rumours
- Intimidation
- Deliberately excluding or isolating an individual
- Withholding information or denying access to information required to undertake assigned responsibilities
- Setting unreasonable timelines
- Setting excessive workloads or setting tasks which are beyond an individual’s capability
- Changing arrangements to deliberately inconvenience individuals.

Bullying is not:

- A single incident or unreasonable behaviour
- Allocation of activities where the requirements are reasonable
- Setting performance goals, standards or deadlines
- Deciding not to promote or accept an individual for role or position
- Managing unsatisfactory performance or inappropriate behaviour in line with RIMPA Global’s governance framework
- Implementing organisational changes, restructuring or reporting structures
- Disciplinary action where managed in accordance with RIMPA Global’s governance framework

Workplace conflict or differences of opinion and disagreements are generally not workplace bullying; it is common to have differences and disagreements without engaging in the repeated or unreasonable behaviour that creates a risk to health and safety. In the instance where the behaviour creates a risk to health and safety, this would be considered bullying.

## **9.2 Harassment**

Harassment is unwelcome behaviour that intimidates, offends or humiliates an individual, or group of people. Harassment including sexual harassment is determined by the nature and consequences of the behaviour, not the intent of the initiator, and occurs in circumstances where a reasonable person would have expected the behaviour to be offensive, humiliating or intimidating. Harassment may be repeated or a one-off incident. Harassment can be physical, verbal or written.



Harassment is:

- Offensive, threatening, intimidating, belittling, derogatory behaviours or demonstrating hostility or aversion directed at an individual or a group of people (i.e., racial groups, stereotypes etc).

### **9.3 Sexual Harassment**

Sexual harassment is a form of harassment. Sexual harassment is any unwelcomed, unwanted or uninvited behaviour conduct of a sexual nature. Sexual harassment may be repeated or a one-off incident. Harassment can be physical, verbal or written.

Sexual harassment is:

- Unwelcomed physical actions and can include touching, patting, pinching, kissing, embracing someone, deliberately brushing up against someone, sexual assault and rape
- Unwelcomed verbal or written comments of a sexual nature and can include insults or taunts, offensive jokes, suggestive comments about an individual’s physical appearance, persistently inviting someone out, intrusive questions about a person's private or sex life, sexual propositions, sending sexually explicit emails or text messages, suggestive letters and drawings and advances on social networking sites
- Unwelcomed non-verbal actions, this can include leering or staring, displays of sexually explicit material such as posters, pornographic material, magazines or screen savers, offensive body and hand movements, indecent exposure and stalking.

Sexual harassment is not:

- Behaviour which is based on mutual attraction, friendship or respect
- Behaviour where the interaction is consensual, welcome and reciprocated.

### **9.4 Discrimination**

Discrimination is when a person is treated unfairly or less favourably than another person in the same or similar circumstance.

Discrimination can occur in any aspect of:

- Race
- Colour
- Sex
- Sexual orientation, gender identity or intersex status
- Pregnancy
- Age
- Marital status
- Physical or mental disability



- Family or carers' responsibilities
- Religion
- Political opinion
- National extraction
- Social origin
- Any other attribute defined in state or federal legislation.

## 9.5 Victimization

Victimization means subjecting or threatening to subject a person to some form of detriment because of actions they have taken or are preparing to take.

Victimization may result from actions that may include:

- Having lodged or preparing to lodge, a complaint of discrimination or harassment
- Providing information or documents to an internal investigation or external agency in line with RIMPA Global's governance framework and/or the law
- Reasonably asserting one's rights or supporting someone else's right
- Making an allegation a person has acted unlawfully under anti-discrimination laws.

## 10 The Impacts of Inappropriate Behaviours

Bullying, harassment, discrimination, victimisation, and any kind of inappropriate behaviour can have direct impacts such as:

- Affecting the health and performance of an individual or group of people, including stress, depression and anxiety
- Affecting the professional reputation of a member
- Creating an intimidating hostile, offensive or distressing environment
- Increasing in absenteeism, staff turnover, reduced productivity and/or motivation
- Losing experienced and skilled people
- Reflecting negatively on the integrity and standing of RIMPA Global
- Increasing the risk to RIMPA Global of exposure to legal or compensation costs.

## 11 Lodging a Complaint or Grievance

All complaints lodged are taken seriously. Further information on how to lodge a complaint or grievance can be found in RIMPA Global's Complaints and Grievance Policy.



## 12 Compliance with this Policy

Any breaches of this policy may result in disciplinary action, up to and including termination of employment, removal of volunteer duties and potential cancellation of RIMPA Global membership.

## Appendix A – Sexual Harassment Prevention Plan

### 13 Purpose

RIMPA Global is committed to eliminating sexual harassment and sex-based harassment, so far as is reasonably practicable. This Prevention Plan outlines the practical steps RIMPA Global will take to prevent unlawful conduct and meet its positive duty obligations under the Sex Discrimination Act 1984 (Cth).

### 14 Scope

This Plan applies to all RIMPA Global People and to conduct occurring in any workplace or work-related context, including conferences, meetings, travel, training, online communications, and social events.

### 15 Risk Factors

RIMPA Global recognises that sexual harassment risks may arise in:

- Conferences, workshops, and networking events
- Travel and accommodation associated with events
- Online meetings and digital communications
- Power imbalances between leaders and others
- One-on-one meetings
- Social functions involving alcohol
- Interactions with suppliers, sponsors, and members.

### 16 Prevention Measures

RIMPA Global will:

- Maintain and communicate this Policy and Prevention Plan
- Provide regular education and awareness training
- Promote expected standards of behaviour
- Include behavioural expectations in event materials
- Conduct risk assessments for major events
- Provide multiple reporting pathways
- Respond promptly to complaints
- Monitor trends and review incidents.

## 17 Roles and Responsibilities

### Board

Provides oversight and ensures compliance with legal obligations.

### CEO

Responsible for implementation, training, and monitoring.

### Managers

Model appropriate behaviour and address concerns promptly.

### All RIMPA Global People

Treat others with dignity and report inappropriate conduct.

## 18 Reporting Options

Concerns may be reported to:

- CEO
- Chair of the Board, if the concern relates to the CEO
- A nominated Board member
- An external support service, where appropriate.

Reports may be made formally or informally.

## 19 Response to Reports

RIMPA Global will:

- Acknowledge reports promptly
- Assess risks to health and safety
- Take immediate action where necessary
- Investigate fairly and confidentially
- Implement appropriate outcomes
- Protect individuals from victimisation.

## 20 Support Available

Support may include:

- Referral to counselling services
- Adjustments to duties or reporting lines
- Alternative attendance arrangements at events.

## 21 Monitoring and Review

RIMPA Global will review this Plan at least every three years, or earlier if:

- There is a significant incident
- Legislation changes
- Organisational risks change.

## 22 Continuous Improvement

RIMPA Global will:

- Analyse complaint trends
- Seek feedback from participants
- Update training and controls
- Strengthen preventative measures where required.

