Anti-Discrimination and Freedom from Bullying and Harassment Policy

Ref: 3.2/0926

Policy Group	03 General
Related Policy	CitiReach Human Rights Policy (2.7) CitiReach Staff Code of Conduct Policy (2.8) CitiReach Complaints Policy (3.4) CitiReach Reporter Protection Policy (3.3)
Commencement Date	14.09.2026
Review Date	14.09.2027

Intent

CitiReach is committed to providing a workplace and a service free from unlawful discrimination, bullying, harassment and victimisation, for its Personnel and for the participants it supports. This policy sets out CitiReach's obligations and the standard of behaviour expected of everyone connected with CitiReach.

CitiReach supports and employs people of every background, culture and belief, and this policy applies equally and without exception to all Personnel and participants regardless of any protected attribute.

Scope

Inclusions: All CitiReach Personnel, and all participants and members of the public in their dealings with CitiReach.

Restrictions: Nil.

Exclusions: Nil.

Objectives

1. To comply with the Disability Discrimination Act 1992 (Cth), the Fair Work Act 2009 (Cth), and the Anti-Discrimination Act 1991 (Qld).
2. To ensure Personnel and participants are treated fairly and with respect, regardless of a protected attribute.
3. To prevent bullying, harassment and victimisation, and to respond effectively where it occurs.
4. To provide a safe way to raise a concern about discrimination, bullying or harassment.

Policy Provisions

Unlawful Discrimination

1. CitiReach does not tolerate discrimination — treating a person unfavourably because of a protected attribute — in employment, recruitment, or the provision of supports. Protected attributes include:
    1.1. Disability, age, sex, gender identity, sexual orientation, intersex status, and pregnancy or family responsibilities.

1.2. Race, colour, national or ethnic origin, and religious belief or activity (or lack of religious belief or activity).

1.3. Marital or relationship status, and political belief.

2. This policy governs the standard of conduct CitiReach requires of its Personnel in their dealings with participants, families, colleagues and the community — it does not affect the exemptions available at law to Christian Outreach Centre in its own religious activities as a church, which are addressed separately in Citipointe's own policies and do not apply to CitiReach's employment or delivery of NDIS supports.

Bullying

3. Bullying is repeated, unreasonable behaviour directed at a person, or a group of people, that creates a risk to health and safety. It can include:

3.1. Aggressive or intimidating conduct.

3.2. Belittling, humiliating or excluding comments or behaviour.

3.3. Unreasonable work demands, or deliberately withholding information a person needs to do their job.

4. Bullying does not include reasonable management action taken in a reasonable way, such as setting performance expectations, providing constructive feedback, or managing misconduct.

Harassment

5. Harassment is unwelcome conduct, including conduct of a sexual nature, that a reasonable person would find offensive, humiliating or intimidating. Sexual harassment includes unwelcome sexual advances, requests for sexual favours, or other unwelcome conduct of a sexual nature.

Victimisation

6. Victimisation — subjecting a person to a detriment because they have made, or supported someone else to make, a complaint of discrimination, bullying or harassment — is itself a serious breach of this policy.

Prevention

7. CitiReach takes reasonable steps to prevent discrimination, bullying and harassment, including:

7.1. Including this policy in Personnel induction and training.

7.2. Modelling respectful behaviour from CitiReach leadership.

7.3. Responding promptly and seriously to any report.

Responding to a Concern

8. A person who experiences or witnesses discrimination, bullying or harassment can raise it:

8.1. Informally, with the person concerned, where it is safe and appropriate to do so.

8.2. Formally, with the Head of Operations, or under the Complaints Policy (3.4).

8.3. Externally, with the Australian Human Rights Commission, the Queensland Human Rights Commission, or the NDIS Commission, at any time.

9. A person who raises a concern in good faith is protected from victimisation under the Reporter Protection Policy (3.3). CitiReach investigates reports promptly, fairly and confidentially, and may take disciplinary action, up to and including termination of engagement, where a breach is substantiated.

Supporting Procedures and Guidelines

- CitiReach Complaints Policy (3.4)
- CitiReach Reporter Protection Policy (3.3)
- Australian Human Rights Commission guidance on workplace bullying and harassment

Relevant Commonwealth/State Legislation

- Disability Discrimination Act 1992 (Cth)
- Sex Discrimination Act 1984 (Cth)
- Age Discrimination Act 2004 (Cth)
- Racial Discrimination Act 1975 (Cth)
- Anti-Discrimination Act 1991 (Qld)
- National Disability Insurance Scheme Act 2013 (Cth)
- NDIS Code of Conduct (NDIS Provider Registration and Practice Standards) Rules 2018 (Cth)
- Fair Work Act 2009 (Cth)
- Social, Community, Home Care and Disability Services Industry Award 2010 (Cth)

Definitions

CitiReach – CitiReach Community Support Services, a business name of Christian Outreach Centre trading as Citipointe Church, providing NDIS community supports in Brisbane, accountable to the Citipointe COM.

NDIS Commission – the NDIS Quality and Safeguards Commission, the independent regulator of NDIS providers and workers.

Participant – a person accessing NDIS-funded supports from CitiReach.

Personnel – CitiReach employees (permanent and casual), contractors and volunteers.

Protected Attribute – a personal characteristic protected from discrimination under Commonwealth or Queensland law, such as disability, age, sex, race or religious belief.

Policy Dissemination and Procedures

Procedures relating to this policy are drafted by the CitiReach Head of Operations, with input from the Citipointe Compliance Office where the policy touches Citipointe's own framework. Personnel are informed of this policy and any related procedures through induction, team meetings, and access to CitiReach's policy folder.

Accountabilities

Implementation	CitiReach Head of Operations
Compliance	CitiReach Head of Operations
Monitoring and Evaluation	CitiReach Head of Operations, with the Citipointe Compliance Office
Development/Review	CitiReach Head of Operations, with the Citipointe Compliance Office

Revisions

Reference No: 3.2

Version	Approval Date	Committee/Board	Resolution/Minute
/0926	14.09.2026	Citipointe COM	Pending adoption