

# Respectful Behaviour and Conduct Policy

## PURPOSE

---

This policy establishes Keystone Training Group's commitment to maintaining safe, respectful and inclusive working and learning environments.

It sets organisational expectations for respectful behaviour and outlines the organisation's approach to preventing and addressing bullying, harassment, discrimination, vilification and other forms of inappropriate conduct.

This policy supports safe and inclusive environments for employees, students and stakeholders and promotes a culture of integrity, fairness and mutual respect.

## SCOPE

---

This policy applies across Keystone Training Group, including Trainwest, Vocational Training Services (VTS), and Opportune Professional Development.

It applies to all activities conducted by or on behalf of the organisation, including employment, training and assessment delivery, workplace-based learning, online environments, meetings, events and communications.

This policy should be read in conjunction with the **Employee Code of Conduct** and **Student Code of Conduct**.

## POLICY STATEMENT

---

Keystone Training Group is committed to providing environments where all individuals are treated with dignity, respect and fairness.

The organisation does not tolerate behaviour that causes harm, intimidation, discrimination or exclusion.

Respectful behaviour supports positive learning experiences, workforce wellbeing and compliance with legislative and regulatory obligations.

# POLICY

---

## Respectful Conduct Expectations

All individuals engaged with the organisation, including employees, students, contractors, third-party providers and visitors, must:

- treat others with courtesy, professionalism and fairness
- communicate respectfully in person, online and through digital communication platforms
- recognise and value diversity of culture, identity, language, background, ability and lived experience
- demonstrate inclusive behaviour and avoid bias, stereotyping or exclusion
- respect cultural identity, religious beliefs and personal values
- maintain appropriate personal and professional boundaries
- resolve disagreements or conflicts constructively and seek assistance where required
- act in ways that support safe, respectful and inclusive learning and working environments.

Respectful behaviour is expected in all organisational activities, including training delivery, assessment activities, workplace interactions, online learning environments, meetings, events and communications.

## Prohibited Conduct

Keystone Training Group does not permit conduct that undermines the safety, dignity, wellbeing or participation of others.

Prohibited conduct includes, but is not limited to:

- bullying, harassment or discrimination
- sexual harassment or inappropriate sexual conduct
- racism, antisemitism, religious discrimination or other forms of vilification or hate-based behaviour
- cultural harassment or behaviour that disrespects cultural identity
- violence, threats, intimidation or humiliation
- victimisation or retaliation against individuals who raise concerns or complaints
- abuse of authority, power or position
- behaviour that creates a hostile, unsafe or intimidating environment
- misuse of communication systems, social media or digital platforms to harass or harm others
- behaviour that constitutes a psychosocial hazard under work health and safety legislation.

Such behaviour is inconsistent with Keystone Training Group values and may constitute misconduct.

## Cultural Safety and Inclusion

Keystone Training Group recognises the importance of culturally safe and inclusive environments for both employees and students.

The organisation acknowledges Aboriginal and Torres Strait Islander peoples as the First Peoples of Australia and respects their cultures, histories and connection to Country.

All individuals engaged with the organisation must:

- demonstrate respect for Aboriginal and Torres Strait Islander cultures and perspectives
- use culturally respectful communication and behaviour
- support inclusive environments that recognise cultural identity and diversity
- avoid behaviour that causes cultural harm, exclusion, stereotyping or discrimination
- contribute to environments where First Nations people feel culturally safe and able to participate fully.

## Safe Learning and Working Environments

Keystone Training Group will provide learning and working environments that support safety, participation and wellbeing.

The organisation will:

- promote environments where individuals feel safe to participate and express ideas
- support inclusive teaching and learning practices
- address behaviour that undermines safety, respect or participation
- encourage early reporting and resolution of concerns
- provide fair and respectful processes for managing incidents or concerns.

Detailed behavioural expectations are defined in the **Employee Code of Conduct** and **Student Code of Conduct**.

Alleged breaches of conduct are managed in accordance with the **Student Behaviour Misconduct Procedure**, **Disciplinary Management Procedure**, and **Complaints and Feedback Procedure** where applicable.

## Digital and Online Conduct

Respectful behaviour must be maintained in all digital and online environments used for work or learning.

Individuals must:

- use organisational communication systems, learning platforms and social media responsibly
- avoid sharing offensive, discriminatory, defamatory or inappropriate material through organisational systems or digital platforms
- respect the privacy and confidentiality of others
- maintain professional and respectful communication in digital interactions.

Online conduct that undermines safety, dignity or inclusion will be managed in accordance with this policy.

## Reporting Concerns and Incidents

Keystone Training Group encourages individuals to raise concerns where inappropriate behaviour, misconduct or unsafe conduct occurs.

Concerns or incidents may be reported through:

- a manager or supervisor
- a trainer or assessor
- student support staff
- a member of organisational leadership
- the Complaints and Feedback process
- the Grievances process
- Work Health and Safety incident reporting channels.

Reports will be managed respectfully, confidentially and fairly, as appropriate and in accordance with privacy, safety and legal requirements.

Individuals who raise concerns in good faith will be protected from victimisation, retaliation or other disadvantage.

## Response to Concerns

Keystone Training Group will respond to reports of inappropriate behaviour in a timely and fair manner. Matters will be managed in accordance with the principles of procedural fairness and natural justice.

Responses may include:

- informal resolution or facilitated discussion
- mediation or early intervention
- behavioural guidance or corrective action
- formal investigation in accordance with organisational procedures
- referral to relevant authorities where required by law.

Responses will be proportionate to the seriousness of the behaviour and aligned with organisational policies and procedures.

## Breaches of the Policy

Behaviour inconsistent with this policy may result in action in accordance with organisational procedures and contractual arrangements.

Possible outcomes may include:

- behavioural guidance or corrective action
- mediation or facilitated resolution
- disciplinary action for employees
- suspension or cancellation of enrolment for students
- contractual remedies for contractors or third-party providers
- referral to regulatory or legal authorities where required.

Responses to breaches will be managed in accordance with relevant organisational procedures, including the **Student Behaviour Misconduct Procedure**, **Disciplinary Management Procedure**, and **Complaints and Feedback Procedure**, where applicable.

## Quality Management

This policy forms part of our **Quality Management System (QMS)**. It is reviewed annually in accordance with the **Internal Audit Procedure** and is supported by ongoing quality assurance activities. Additional reviews may occur based on risk, feedback, or regulatory change.

Records related to this policy must be maintained as per the **Records Management Policy**. Documents must be version-controlled, stored in approved systems, and retained for audit, compliance, and quality assurance purposes.

Non-compliances, risks, issues and improvements are recorded and addressed in line with the **Continuous Improvement Policy**. Staff are encouraged to submit a **Continuous Improvement (CI) Request** to raise concerns or suggest improvements.

# RESPONSIBILITIES

<b>Chief Executive Officer (CEO)</b>	<ul style="list-style-type: none"> <li>• Provide leadership and oversight to promote a culture of respect, integrity and inclusion across Keystone Training Group.</li> <li>• Ensure organisational systems, resources and governance arrangements support safe and respectful working and learning environments.</li> <li>• Ensure compliance with legislative, regulatory and organisational requirements relating to respectful behaviour and conduct.</li> <li>• Oversee organisational responses to serious incidents, complaints or breaches of this policy.</li> <li>• Monitor organisational trends, risks and improvement opportunities relating to workplace behaviour and culture.</li> </ul>
<b>Managers</b>	<ul style="list-style-type: none"> <li>• Model respectful, inclusive and culturally safe behaviour.</li> <li>• Promote awareness and understanding of this policy and related codes of conduct.</li> <li>• Ensure workers understand their obligations under this policy and associated procedures.</li> <li>• Address inappropriate behaviour promptly, fairly and in accordance with organisational procedures.</li> <li>• Support safe reporting of concerns and protect individuals from victimisation or retaliation.</li> <li>• Escalate serious or complex matters in accordance with organisational governance, grievance and safety processes.</li> </ul>
<b>Trainers &amp; Assessors</b>	<ul style="list-style-type: none"> <li>• Model respectful, inclusive and professional behaviour in all interactions with students and colleagues.</li> <li>• Maintain safe, respectful and inclusive learning environments.</li> <li>• Address inappropriate behaviour in a fair and timely manner.</li> <li>• Report concerns or incidents in accordance with organisational procedures.</li> <li>• Support students to understand behavioural expectations under the Student Code of Conduct.</li> </ul>
<b>Employees, Contractors, Volunteers and Third-Party Providers</b>	<ul style="list-style-type: none"> <li>• Comply with this policy and all related policies, procedures and codes of conduct.</li> <li>• Treat colleagues, students and stakeholders with dignity, fairness and respect.</li> <li>• Contribute to safe, inclusive and culturally respectful working and learning environments.</li> <li>• Avoid behaviour that may cause harm, intimidation, discrimination or exclusion.</li> <li>• Report inappropriate, unsafe or unlawful behaviour through appropriate organisational channels.</li> <li>• Participate in training, awareness activities or professional development relating to respectful behaviour where required.</li> </ul>
<b>Students</b>	<ul style="list-style-type: none"> <li>• Comply with this policy and the Student Code of Conduct.</li> <li>• Treat staff, trainers, and fellow students with respect and courtesy.</li> <li>• Contribute to safe, inclusive and respectful learning environments.</li> <li>• Avoid behaviour that may cause harm, intimidation, discrimination or disruption to learning activities.</li> <li>• Raise concerns or report inappropriate behaviour through available reporting channels.</li> </ul>

## DEFINITIONS

<b>Bullying</b>	Repeated unreasonable behaviour directed towards a worker or group of workers that creates a risk to health and safety.
<b>Cultural Safety</b>	An environment that respects cultural identity and where individuals feel safe from discrimination, racism or cultural harm.
<b>Direct Discrimination</b>	A type of discrimination that specifically and explicitly excludes a person or group of people from a benefit or opportunity or significantly reduces their chances of obtaining it due to race or ethnic origin, gender, sexual orientation, religion, marital status or pregnancy, and disability, among others, being applied as a barrier.
<b>Discrimination</b>	Treating a person or group unfairly or less favourably because of a protected attribute such as race, sex, disability, age, religion, sexual orientation or other attributes protected under law.
<b>Harassment</b>	Any unwelcome behaviour that offends, humiliates or intimidates another person. Harassment can be verbal, physical, or psychological and includes sexual harassment. Harassment is also a form of discrimination and can happen in various contexts like the workplace, educational institutions, public services, etc.
<b>Indirect Discrimination</b>	A type of discrimination that occurs when there is an unreasonable rule or policy that is the same for everyone but has an unfair effect on people who share the same protected attributes (e.g. race, gender, age, disability, sexual orientation, religion, marital status or pregnancy).
<b>Misconduct</b>	Behaviour that breaches organisational policies, procedures or codes of conduct.
<b>Positive Duty</b>	An obligation under the <i>Sex Discrimination Act 1984 (Cth)</i> to take proactive steps to eliminate sexual discrimination, harassment, and victimisation.
<b>Psychosocial Hazard</b>	A psychosocial hazard is a hazard that arises from work design, workplace interactions or behaviours that may cause psychological harm.
<b>Sexual Discrimination</b>	Occurs when someone is treated less favourably or not given the same opportunities as a person of a different sex because of their sex. It also occurs when a rule or policy applies to everyone but disadvantages a person based on his or her sex, and the policy is not reasonable.
<b>Sexual Harassment</b>	Any unwanted or unwelcome sexual behaviour where a reasonable person would have anticipated the possibility that the person harassed would feel offended, humiliated or intimidated. It has nothing to do with mutual attraction or consensual behaviour.
<b>Third-Party</b>	Any person who has an arrangement with an NVR RTO to deliver services, but does not include: <ul style="list-style-type: none"> <li>• employees of the organisation</li> <li>• experts engaged by the organisation</li> <li>• government agencies and government-funded agencies that refer VET students to the organisation and do not receive any payment from the organisation for doing so.</li> </ul>
<b>Vicarious Liability</b>	Employers can be held legally responsible for acts of discrimination or harassment in the workplace or in connection with a person's employment.
<b>Victimisation</b>	The unlawful treatment of a person because they have made a complaint about how they have been treated at work. The main feature of victimisation is that it punishes a person for speaking out and/or stops them from complaining.
<b>Vilification</b>	Public behaviour that incites hatred, serious contempt or severe ridicule towards a person or group because of race, religion, sexuality, gender identity or other protected attributes.

## RELATED DOCUMENTS

### Internal

<b>Policies</b>	<p>Access, Equity and Inclusion Policy</p> <p>Appeals Policy</p> <p>Complaints and Feedback Policy</p> <p>Employee Code of Conduct</p> <p>Student Code of Conduct</p> <p>Student Wellbeing and Safety Policy</p>
<b>Procedures</b>	<p>Appeals Procedure</p> <p>Complaints and Feedback Procedure</p> <p>Disciplinary Management Procedure</p> <p>Grievances Procedure</p> <p>Performance Management Procedure</p> <p>Student Behaviour Misconduct Procedure</p>
<b>Guides</b>	<p>Employee Handbook</p> <p>Student Handbook</p> <p>Third-Party Student Handbook</p>
<b>Systems</b>	<p>Canvas LMS</p> <p>Organisational Chart</p> <p>Quality Management System (QMS)</p> <p>Student Management System (SMS)</p>

### External

<b>Legislation and Regulatory Instruments</b>	<p><a href="#">National Vocational Education and Training Regulator (Outcome Standards for NVR Registered Training Organisations) Instrument 2025</a></p> <p><a href="#">National Vocational Education and Training Regulator (Compliance Standards for NVR Registered Training Organisations and Fit and Proper Person Requirements) Instrument 2025</a></p> <p><a href="#">National Vocational Education and Training Regulator Act 2011</a></p> <p><a href="#">Age Discrimination Act 2004 (Cth)</a></p> <p><a href="#">Australian Human Rights Commission Act 1986 (Cth)</a></p> <p><a href="#">Disability Discrimination Act 1992 (Cth)</a></p> <p><a href="#">Disability Standards for Education 2005 (Cth)</a></p> <p><a href="#">Fair Work Act 2009 (Cth)</a></p> <p><a href="#">Equal Opportunity Act 1984 (WA)</a></p> <p><a href="#">Racial Discrimination Act 1975 (Cth)</a></p> <p><a href="#">Sex Discrimination Act 1984 (Cth)</a></p> <p><a href="#">Workplace Gender Equality Act 2012 (Cth)</a></p>
<b>Guidance and Resources</b>	<p>Employee Assistance Program (EAP): Lifeskills Australia</p> <p>AHRC: The Positive Duty in the Sex Discrimination Act</p> <p>AHRC: Guidelines for Complying with the Positive Duty under the Sex Discrimination Act 1984 (Cth)</p> <p>Fair Work Commission</p>