

# Discrimination and Harassment Policy and Procedure

## 1. Purpose

The purpose of this Policy and Procedure is to ensure that Princeton International College provides a safe, respectful, inclusive and supportive learning environment for all students and staff, free from discrimination, harassment, bullying and victimisation.

This policy supports the Standards for Registered Training Organisations (RTOs) 2025 and ensures that Princeton International College maintains appropriate systems to support student wellbeing, safety, and fair treatment across all training delivery.

Princeton International College delivers classroom-based training programs and ensures that all students are able to participate in learning activities in a safe and supportive environment.

The College is committed to:

- Promoting a respectful, inclusive and culturally appropriate learning environment
- Preventing and addressing discrimination, harassment, bullying and victimisation
- Providing clear, fair and confidential processes for managing complaints
- Supporting student wellbeing and access to appropriate support services
- Ensuring all staff and students understand their rights and responsibilities

Princeton International College ensures that overseas students enrolled under CRICOS, including those studying English language programs and vocational education programs, are supported in accordance with the Education Services for Overseas Students Act 2000 (ESOS Act), the National Code 2018, and the ELICOS Standards 2018.

This includes access to appropriate academic and welfare support, protection from discrimination and harassment, and timely identification and management of any risks to student safety or wellbeing.

## 2. Definitions

**Discrimination:** Unfair treatment of a person based on characteristics such as race, gender, age, sexual orientation, disability, religion, culture, marital status, or any other characteristic protected by law.

- **Direct Discrimination:** Treating someone unfairly due to their personal characteristics.

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– **Indirect Discrimination:** Imposing a rule, requirement, or practice that appears neutral but disproportionately affects people with certain characteristics.

**Harassment:** Harassment occurs when someone is made to feel intimidated, insulted or humiliated because of their race, colour, national or ethnic origin; sex; disability; sexual preference; or some other characteristic specified under anti-discrimination or human rights legislation. It can also happen if someone is working in a ‘hostile’ or intimidating – environment.

<sup>1</sup> This includes;

- **Sexual Harassment:** Unwelcome sexual advances, requests for sexual favours, or other conduct of a sexual nature that creates a hostile environment.
- **Racial Harassment:** Behaviour that belittles or humiliates an individual based on their race, colour, nationality, or ethnic origin.
- **Bullying:** Repeated, unreasonable behaviour directed towards an individual or group that creates a risk to health and safety.

## 3. Policy Statement and Commitment

Princeton International College has a zero-tolerance approach to discrimination, harassment, bullying and victimisation.

The College is committed to providing a safe, respectful and inclusive learning environment where all students are treated fairly and with dignity and are able to participate in their studies without fear of discrimination or harassment.

This commitment applies to all students (domestic and international), staff, contractors and visitors across all College activities, including training delivery and student support interactions.

Princeton International College ensures that students are able to raise concerns and access appropriate support through designated staff, including the Student Support Officer, ELICOS Coordinator, Training Manager, Administration staff, and Trainers. The Chief Executive Officer

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(CEO) maintains overall responsibility for ensuring that concerns are appropriately managed and resolved.

Matters relating to student wellbeing, support services, and inclusion are managed in conjunction with the College's Student Support and Wellbeing Policy, Diversity and Inclusion Policy, and Student Handbook.

### 4. Zero Tolerance Policy

Princeton International College does not tolerate discrimination, harassment, bullying or victimisation in any form. The College is committed to fostering a respectful and inclusive learning environment where all individuals are treated with dignity and fairness, regardless of personal characteristics.

This commitment aligns with relevant Australian legislation, including the Racial Discrimination Act 1975, Sex Discrimination Act 1984, Disability Discrimination Act 1992, and Age Discrimination Act 2004.

All staff, contractors and students are expected to comply with this policy. Where discrimination or harassment is identified, appropriate action will be taken in accordance with this Policy and Procedure and other relevant College policies.

Suspected criminal behaviour will be reported to the appropriate authorities where required.

Princeton International College aims to:

- Provide a learning environment free from discrimination and harassment
- Promote respectful behaviour and inclusive practices
- Ensure all individuals understand their rights and responsibilities
- Provide fair, confidential and timely complaint processes
- Protect individuals from victimisation or retaliation
- Encourage reporting of inappropriate behaviour

This commitment applies to all students, including those enrolled under CRICOS and ELICOS programs. Students are supported through designated staff and relevant College policies,

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including the Student Support and Wellbeing Policy and the Complaints and Appeals Policy and Procedure.

## 5. Prohibited Conduct

Examples of behaviour that are not permitted include, but are not limited to:

- Offensive comments, jokes or language
- Unwelcome or inappropriate physical contact
- Displaying offensive or inappropriate material
- Insulting or belittling an individual based on personal characteristics
- Unwelcome sexual advances or requests
- Any behaviour that creates an intimidating, hostile or unsafe environment
- Victimisation or retaliation against individuals who raise concerns

## 6. Roles and Responsibilities

Princeton International College ensures that the implementation of this Policy and Procedure is supported through clearly defined roles and responsibilities. All staff are expected to contribute to a safe, respectful and inclusive environment, while specific responsibilities are assigned as follows:

| Role                                 | Responsibilities                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|--------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Chief Executive Officer (CEO)</b> | <ul style="list-style-type: none"> <li>• Holds overall accountability for the implementation and compliance of this Policy and Procedure</li> <li>• Ensures compliance with the ESOS Act 2000, National Code 2018, ELICOS Standards 2018, and RTO Standards 2025</li> <li>• Reviews and approves outcomes for serious complaints and disciplinary actions</li> <li>• Ensures appropriate escalation, including engagement of external parties where required</li> <li>• Monitors trends and ensures continuous improvement actions are implemented</li> </ul> |
| <b>Student Support Officer</b>       | <ul style="list-style-type: none"> <li>• Primary contact for students regarding discrimination, harassment or related concerns</li> <li>• Manages informal and formal complaint processes</li> </ul>                                                                                                                                                                                                                                                                                                                                                          |

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| Role                                         | Responsibilities                                                                                                                                                                                                                                                                                          |
|----------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                              | <ul style="list-style-type: none"> <li>• Provides guidance, support and referrals to internal and external support services</li> <li>• Maintains confidentiality and accurate records of all matters</li> <li>• Keeps the CEO informed of all complaints and outcomes</li> </ul>                          |
| <b>ELICOS Coordinator / Training Manager</b> | <ul style="list-style-type: none"> <li>• Supports implementation of this policy within training delivery</li> <li>• Monitors student behaviour and classroom environment</li> <li>• Refers concerns to the Student Support Officer</li> <li>• Supports resolution strategies where appropriate</li> </ul> |
| <b>Administration Staff</b>                  | <ul style="list-style-type: none"> <li>• Provide information to students about how to raise concerns</li> <li>• Refer students to appropriate staff members</li> <li>• Maintain confidentiality of any information received</li> </ul>                                                                    |
| <b>Trainers and Assessors</b>                | <ul style="list-style-type: none"> <li>• Promote respectful and inclusive classroom behaviour</li> <li>• Identify and report concerns</li> <li>• Refer students to the Student Support Officer for support and guidance</li> </ul>                                                                        |

### 7. Consequences of Discrimination and Harassment

All incidents of discrimination, harassment, bullying or victimisation will be managed in accordance with the principles of procedural fairness and natural justice, ensuring that all parties are given the opportunity to respond before any decision is made.

Where unlawful or serious behaviour is identified, the matter may be referred to relevant external authorities where required.

Where a breach of this policy is substantiated, actions will be proportionate to the severity and nature of the behaviour and may include:

- Counselling or retraining
- Formal warning
- Mediation or conciliation
- Suspension
- Cancellation of enrolment (for students)
- Termination of employment or contract (for staff or contractors)

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Any action taken will be determined and approved by the Chief Executive Officer (CEO), and managed in accordance with relevant College policies and procedures, including the Complaints and Appeals Policy and Procedure.

Where applicable, outcomes may impact a student's enrolment status and will be managed in line with the College's enrolment and student management processes

### 8. Informal Complaint Process

Princeton International College encourages the resolution of concerns at an early stage through an informal process, where appropriate. This approach aims to resolve issues quickly, respectfully and with minimal disruption to the learning environment.

Students or staff may raise concerns with an appropriate staff member, including the Student Support Officer, Trainer, ELICOS Coordinator, Training Manager, or Administration staff, depending on the nature of the concern.

Informal resolution may include:

- Seeking advice or clarification
- Facilitated discussion between the parties involved
- Mediation to resolve misunderstandings
- Agreement on appropriate behavioural changes

The Student Support Officer plays a key role in supporting informal resolution and will:

- Provide guidance and support in a confidential and respectful manner
- Assist in facilitating discussions where appropriate
- Ensure that all parties are treated fairly
- Record the concern and outcome in accordance with College procedures
- Inform the CEO where the matter is serious, ongoing, or unresolved

Informal resolution is generally appropriate where:

- The matter is minor or low risk in nature
- The complainant prefers an informal approach

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- Both parties are willing to participate in resolution
- Ongoing relationships need to be maintained

If the matter is not resolved through informal processes, or if it is considered serious, it will be escalated to the formal complaint process in accordance with the Complaints and Appeals Policy and Procedure.

### Overview:

| Step                            | Action                                            | Responsible Person                        |
|---------------------------------|---------------------------------------------------|-------------------------------------------|
| <b>Raise Concern</b>            | Student or staff member raises concern informally | Student / Staff                           |
| <b>Initial Support</b>          | Guidance and advice provided                      | Trainer / Admin / Student Support Officer |
| <b>Discussion / Mediation</b>   | Facilitate discussion between parties             | Student Support Officer                   |
| <b>Outcome Agreement</b>        | Agree on resolution or actions                    | All parties involved                      |
| <b>Record Keeping</b>           | Document outcome and monitor if required          | Student Support Officer                   |
| <b>Escalation (if required)</b> | Refer to formal complaint process                 | Student Support Officer / CEO             |

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### 9. Formal Complaint Process

Where informal resolution is not appropriate or has been unsuccessful, Princeton International College will manage the matter through a formal complaint process. The process is coordinated by the Student Support Officer, with oversight from the Chief Executive Officer (CEO), and ensures that all complaints are handled fairly, confidentially and in accordance with the principles of procedural fairness and natural justice. Students have the right to be supported throughout the process and to access internal and external appeals where required.

| Stage                                            | Process Description                                                                                                                                                                   | Responsible Person                        |
|--------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------|
| <b>Complaint Lodgement</b>                       | A complaint may be submitted verbally or in writing as per our Complaints Handling Policy and Procedure. Verbal complaints are documented to ensure an accurate record is maintained. | Student / Staff / Student Support Officer |
| <b>Initial Support &amp; Process Explanation</b> | The complainant is provided with information about the process, their rights, confidentiality, and the option to have a support person present.                                       | Student Support Officer                   |
| <b>Information Gathering</b>                     | Relevant information, statements, and evidence are collected to understand the matter.                                                                                                | Student Support Officer                   |
| <b>Respondent Notification</b>                   | The respondent is informed of the complaint and provided with sufficient information to respond.                                                                                      | Student Support Officer                   |
| <b>Assessment</b>                                | The complaint is assessed based on available evidence, applying the principle of balance of probabilities (more probable than not).                                                   | Student Support Officer / CEO             |

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| Stage                            | Process Description                                                                                                                                                                                                                                                                                                                                                           | Responsible Person      |
|----------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------|
| <b>Outcome Determination</b>     | A fair and consistent outcome is determined and reviewed by the CEO.                                                                                                                                                                                                                                                                                                          | CEO                     |
| <b>Outcome Communication</b>     | The outcome is communicated in writing to the relevant parties, subject to privacy considerations.                                                                                                                                                                                                                                                                            | Student Support Officer |
| <b>Implementation of Actions</b> | Any required actions are implemented in accordance with college policies.                                                                                                                                                                                                                                                                                                     | CEO / Relevant Staff    |
| <b>Internal Appeal</b>           | If dissatisfied, the complainant may access the internal appeals process in accordance with the Appeals Handling Policy and Procedure. During the internal and external appeals process, the student's enrolment will be maintained, and no reporting or final action will be taken until the process is completed, unless there is an immediate risk to safety or wellbeing. | Student                 |
| <b>External Appeal</b>           | If a party is not satisfied with the outcome of the internal appeals process, they may access an external review through Resolution Institute. Princeton International College will provide the necessary contact details and support the student in accessing this service.                                                                                                  | Student / College       |

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## External Review

Princeton International College has a formal arrangement with an independent external dispute resolution body, Resolution Institute, to provide external complaints and appeals services where required. International students may also access the Overseas Student Ombudsman (<https://www.ombudsman.gov.au/complaints/international-student-complaints>) where applicable.

## 10. Determining Appropriate Actions

In determining appropriate actions, Princeton International College will ensure that all decisions are fair, consistent and proportionate to the nature of the behaviour, and are made in accordance with the principles of procedural fairness and natural justice.

Each matter will be considered on a case-by-case basis. In making a decision, the College will take into account:

- The severity and frequency of the behaviour
- The evidence available and reliability of information
- The impact on the individual(s) involved
- Any previous incidents, patterns of behaviour, or history
- Any mitigating or contributing circumstances
- The need to maintain a safe, respectful and inclusive learning environment

All outcomes will be reviewed and approved by the Chief Executive Officer (CEO) to ensure consistency and alignment with College policies and procedures.

Where applicable, actions may have implications for a student's enrolment or participation and will be managed in accordance with relevant College policies, including the Complaints Handling Policy and Procedure and Appeals Handling Policy and Procedure.

## 11. Support Person

All parties involved in a complaint have the right to be accompanied by a support person, advocate or representative during any meetings or interviews.

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The role of the support person is to provide assistance, support and guidance to the individual throughout the process. The support person is not permitted to speak on behalf of the individual or interfere with the process.

Princeton International College will ensure that all parties are provided with reasonable opportunity to arrange a support person and will not unreasonably delay the process where a support person is unavailable.

### 12. Training and Awareness

Princeton International College promotes a respectful and inclusive learning environment through ongoing training and awareness activities for staff and students.

Training and awareness initiatives are designed to ensure that all staff understand their responsibilities and are equipped to identify, prevent and respond to discrimination, harassment, bullying and victimisation.

Training may include:

- Understanding discrimination and harassment
- Cultural awareness and inclusive practices
- Appropriate communication and behaviour
- Identifying and responding to concerns
- Awareness of reporting and complaint processes

Training is provided as part of staff induction and ongoing professional development. Students are also informed of expected standards of behaviour and available support services through orientation, the Student Handbook and ongoing communication.

The Chief Executive Officer (CEO) monitors the effectiveness of training and awareness activities as part of the College's continuous improvement processes.

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## 13. Support and External Assistance

Princeton International College recognises that students and staff may require additional support beyond the College's internal services. Where required, the College will assist individuals in accessing appropriate external support services.

External support may include:

- Counselling and wellbeing services
- Community and welfare support services
- Medical or health services
- Emergency services (000) where immediate assistance is required
- Overseas Student Ombudsman (for international students)

The Student Support Officer will provide guidance, referrals and assistance in accessing these services, ensuring that students are supported in a timely and confidential manner.

## 14. Protection of Overseas Students (CRICOS and ELICOS)

Princeton International College recognises its obligations under the Education Services for Overseas Students Act 2000 (ESOS Act), the National Code 2018, and the ELICOS Standards 2018 to ensure that all overseas students are provided with a safe, supportive and inclusive learning environment.

The College ensures that overseas students:

- Have access to appropriate academic and welfare support throughout their studies
- Are able to raise concerns or complaints without fear of victimisation or disadvantage
- Have access to confidential and fair complaints and appeals processes
- Are supported by designated staff, including the Student Support Officer, ELICOS Coordinator, Training Manager and Trainers
- Are referred to appropriate internal or external support services where required

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Princeton International College actively monitors student wellbeing and engagement throughout the course duration and takes appropriate action where concerns are identified that may impact a student's safety, wellbeing or ability to successfully participate in their studies.

Any complaints involving overseas students are managed in accordance with the Complaints Handling and Appeals Handling Policy and Procedure and relevant regulatory requirements.

## 15. Considerations

Legitimate academic feedback, guidance, or performance discussions provided by trainers and staff do not constitute discrimination or harassment when delivered in a respectful, professional and appropriate manner.

This policy applies specifically to matters relating to discrimination, harassment, bullying and victimisation. Complaints relating to other matters, including academic, administrative or service-related concerns, must be managed in accordance with the Complaints Handling and Appeals Handling Policy and Procedure.

## 16. References

This Policy and Procedure is developed and implemented in accordance with the following legislation and regulatory requirements:

- Standards for Registered Training Organisations (RTOs) 2025 (Outcome Standards)
- Education Services for Overseas Students Act 2000 (ESOS Act)
- National Code of Practice for Providers of Education and Training to Overseas Students 2018
- ELICOS Standards 2018

Relevant legislation relating to discrimination, harassment and equal opportunity:

- Racial Discrimination Act 1975
- Sex Discrimination Act 1984
- Disability Discrimination Act 1992
- Age Discrimination Act 2004
- Australian Human Rights Commission Act 1986

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Other relevant requirements:

- Australian Consumer Law (Competition and Consumer Act 2010)
- Occupational Health and Safety Act 2004 (Victoria)
- Privacy Act 1988

External bodies and support:

- Overseas Student Ombudsman (Commonwealth Ombudsman)
- Resolution Institute (External Dispute Resolution Service)