

POLICY AND PROCEDURES

Workplace Sex Discrimination and Sexual Harassment

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Relevant Rule: HSU Rule 89

Relevant Legislation: Fair Work Act (2009)
Sex Discrimination Act 1984 (Cth)

Scope: This policy, or parts of this policy have application to all HSU Branches

Introduction

The Health Services Union (HSU) is the union representing members employed or usually employed in the health and human service industries in Australia.

In this Policy, the HSU includes the following Branches:

- New South Wales/ACT/Queensland
- South Australia/ Northern Territory
- Tasmania Branch (Trading as Health & Community Services Union)
- Victoria No. 1 Branch (Trading as Health Workers Union)
- Victoria No. 2 Branch (Trading as Health & Community Services Union)
- Victoria No. 3 Branch (Trading as Victorian Allied Health Professionals Association)
- Victoria No. 4 Branch (Trading as Medical Scientists Association of Victoria)
- Western Australia

Branch Policy

Where a Branch does not have a policy consistent with this policy, this policy will apply to that Branch substituting the Branch structures, officers and employees/workers with those contained in this policy where appropriate.

Glossary

'Council' means the National Council of the HSU.

'employee' means HSU National employee.

'FW Act' means the *Fair Work Act 2009* (Cth).

'HSU' means the Health Services Union.

'HSU National' or **'National'** means the National Office of the HSU.

'HSU Rules' means the rules of the HSU registered in accordance with the Act.

'member' means a member of the National Council, National Executive or National Finance Committee or any national committee or sub-committee as defined by the rules of the Union.

'National Officer' whether paid or not, has the same meaning as the phrase 'officer of an organisation' in Division 3A of Part 2 of Chapter 5 of the *Fair Work (Registered Organisations) Act 2009*.

'National Secretary' means person elected by National Council as such in accordance with rule 23B to act in accordance with responsibilities under rule 26 of the HSU Rules.

'other approved person' means person/s approved by the National Secretary, Executive or Finance Committee.

'PCBU' means person conducting a business or undertaking and has the same meaning as in the *Work Health and Safety Act 2011* (Cth). ...

'SD Act' means the *Sex Discrimination Act 1984* (Cth).

'worker' has the same meaning as in the *Work Health and Safety Act 2011* (Cth).

'workplace sex discrimination' is an umbrella term that encompasses:

- Discrimination on the ground of a worker's sex, sexual orientation, gender identity, intersex status, marital or relationship status, pregnancy or potential pregnancy, breastfeeding or family responsibilities;
- Workplace sexual harassment;
- Harassment on the grounds of the sex of a worker;
- Conduct that amounts to subjecting a worker to a hostile work environment on the ground of sex; and
- Certain acts of victimisation against a worker.

1. Application of this Policy

- 1.1 This Policy sets out the HSU's expectations for all people involved with the Union. It applies to the HSU's Officers and workers.
- 1.2 For the purposes of this policy, a 'worker' is an individual who performs work in any capacity, including as an employee, a contractor, a subcontractor, an outworker, an apprentice, a trainee, a student gaining work experience or a volunteer for the HSU. It also includes a person who is seeking to become a 'worker' (e.g. a person interviewing for a job).
- 1.3 In the HSU's context, this includes (but is not limited to) employees and prospective employees of the HSU, contractors or subcontractors and prospective contractors or subcontractors who perform work for the HSU (for example, this could include caterers, cleaners, auditors, conference or meeting venue staff, trainers, researchers, external lawyers, and so on), and HSU members attending events in HSU delegations.
- 1.4 The Policy also applies to any person who attends an HSU gathering or event.
- 1.5 The Policy applies to HSU workplaces, member worksites, external conference or meeting facilities, work-related social events, interstate work trips, and so on, including afterhours work.

2. Principles

- 2.1 The HSU is committed to providing a safe, inclusive, and equitable work environment that is free from discrimination and sexual and sex-based harassment.
- 2.2 The HSU acknowledges that workplace sex discrimination, including workplace sexual and sex-based harassment, can cause lasting physical and psychological damage, disrupt and end careers, impact relationships and financial circumstances, and make people feel belittled, trapped and powerless.
- 2.3 Despite being unlawful, workplace sex discrimination remains common across the workforce with women, trans people, and gender diverse people most likely to be impacted. One in three people have experienced workplace sexual harassment alone, however fewer than one in five people make a formal report, often because they feel shame, or because they fear it will impact their job. The HSU is committed to taking all reasonable steps to prevent workplace sex discrimination before it occurs. It is also committed to establishing processes that encourage, facilitate and support workers to raise concerns and complaints, and clear and fair processes to deal with concerns and complaints.
- 2.4 The intention of this Policy is to educate and inform workers about the various forms of workplace sex discrimination, including sexual and sex-based harassment, and to set out expected standards of behaviour, the steps the HSU will take to prevent workplace sex discrimination, how to report concerns and complaints about

workplace sex discrimination, how reports will be managed, and support services available.

3. Workplace sex discrimination – including workplace sexual harassment – is unlawful

- 3.1 Workplace sex discrimination is unlawful under the SD Act. This includes each of the following:
- 1.1.1 Discrimination on the ground of a worker’s sex, sexual orientation, gender identity, intersex status, marital or relationship status, pregnancy or potential pregnancy, breastfeeding, or family responsibilities;
 - 1.1.2 Workplace sexual harassment;
 - 1.1.3 Harassment on the grounds of the sex of a worker;
 - 1.1.4 Conduct that amounts to subjecting a worker to a hostile work environment on the ground of sex; and
 - 1.1.5 Certain acts of victimisation against a worker.
- 3.2 The FW Act also prohibits workplace sexual harassment, discrimination on the grounds of, relevantly, sex, sexual orientation, breastfeeding, gender identity, intersex status, marital status, family or carer’s responsibilities, or pregnancy, and certain types of victimisation (or adverse action).
- 3.3 Different forms of workplace sex discrimination may overlap and can often occur in combination. Some forms of workplace sex discrimination may also be criminal offences (including certain conduct which constitutes sexual harassment, for example, sexual assault).
- 3.4 It is unlawful for both the HSU and its workers to engage in workplace sex discrimination against other workers (including by sexually harassing other workers), and both the HSU and its workers have responsibilities when it comes to eliminating workplace discrimination.
- 3.5 All workers have a right to a workplace free from workplace sex discrimination.
- 3.6 Who constitutes a ‘worker’ for the purposes of this policy, what constitutes the different forms of workplace sex discrimination set out at 1.1.1 to 1.1.5 above, the rights and responsibilities of HSU workers, processes for managing the risk of workplace sex discrimination at the HSU, and information about support services are set out in the following sections of this policy.
- 3.7

4. What is discrimination on the grounds of a worker’s sex

- 4.1 Workplace discrimination on the grounds of sex occurs when a worker or prospective worker is treated differently – directly or indirectly – because of their

sex, sexual orientation, gender identity, intersex status, marital or relationship status, pregnancy or potential pregnancy, breastfeeding or family responsibilities.

- 4.2 For a prospective worker, this includes being treated differently during recruitment processes, in decisions about who is offered employment, and in relation to the terms and conditions on which employment is offered.
- 4.3 For current workers, this includes being treated differently in relation to the terms and conditions of employment afforded, access to opportunities for promotion, transfer or training, dismissal or other detriment.
- 4.4 Examples of this type of workplace discrimination may include standardised terms and conditions of employment or employment practices which do not support workers with family responsibilities (for example, a resistance to allowing flexible work arrangements), interview panels made up of all men, not providing appropriate facilities for breastfeeding parents to express milk, and so on.

5. What is workplace sexual harassment

- 5.1 Workplace sexual harassment occurs when a worker experiences sexual harassment in connection with their work.
- 5.2 Sexual harassment is unwanted behaviour of a sexual nature. It occurs when a person makes:
 - An unwelcome sexual advance;
 - An unwelcome request for sexual favours; or
 - Other unwelcome conduct of a sexual nature
 in circumstances where the average or reasonable person might think it possible that the person harassed might feel:
 - Offended;
 - Humiliated; and/or
 - Intimidated.
- 5.3 Examples of sexual harassment could include:
 - Inappropriate staring or leering;
 - Unwelcome touching, hugging, cornering or kissing;
 - Sexually suggestive comments or jokes, insults, gestures or taunts;
 - Using suggestive or sexualised nicknames for a person;
 - Sexual gestures;
 - Inappropriate or unwanted invitations to go out on dates;
 - Intrusive questions or comments about a person's private life or body;
 - Inappropriate sexualised comments about a person's reproductive medical concern or pregnancy;
 - Inappropriate comments about a person's gender;
 - Unnecessary familiarity, such as deliberately brushing against a person;
 - Displaying material of a sexual nature in the workplace;
 - Communicating sexually explicit material in person, through phone calls or digitally;
 - Sharing or threatening to share intimate images or videos without consent;

- Being followed or watched inappropriately, or loitering inappropriately, either in person or digitally;
 - Requests or pressure for sex or sexual acts;
 - Indecent exposure;
 - Sexual assault.
- 5.4 Sexual harassment can be physical, verbal or written (including text messages or emails). It can occur anywhere a worker is required to attend in the course of their work, including, for example, their usual workplace, member worksites, external meetings or conferences, training courses or workshops, social gatherings (e.g. team lunches), and so on.
- 5.5 Behaviour does not need to be repeated to constitute sexual harassment. A single instance is enough.
- 5.6 The motive or intention of the person engaging in sexual harassment is irrelevant.
- 5.7 It is important to note that a worker can be a victim of sexual harassment if they witnessed, overheard or were in the presence of unwelcome conduct of a sexual nature, even if the conduct was not directed at them.
- 5.8 It is also important to note that by law, a person may be taken to have engaged in sexual harassment if they cause, instruct, induce, aid or permit another person to engage in sexual harassment, even if they did not directly carry out the sexual harassment themselves.

6. What is harassment on the grounds of sex

- 6.1 While harassment on the grounds of sex, or sex-based harassment, often occurs in combination with sexual harassment, sexual harassment and sex-based harassment are different.
- 6.2 While sexual harassment is unwelcome conduct of a sexual nature, harassment on the grounds of sex occurs when an unwelcome statement of a demeaning nature is made (orally or in writing) to (or in the presence of) a worker because of:
- Their sex; or
 - A characteristic that appertains generally or is generally imputed to their sex in circumstances where the average or reasonable person might think it possible that the person harassed might feel:
 - Offended;
 - Humiliated; and/or
 - Intimidated.
- 6.3 Examples of sex-based harassment could include:
- Asking intrusive personal questions based on a person's sex (for example, asking when a woman plans to have a baby);
 - Making inappropriate comments and jokes to a person based on their sex;
 - Displaying images or materials that are sexist, misogynistic or misandrist;
 - Making sexist, misogynistic or misandrist remarks about a specific person;

- Requesting a person to engage in degrading conduct based on their sex (for example, asking female workers to arrange office birthday presents or clean up after office morning teas, or to take notes in meetings in some circumstances).

6.4 As with sexual harassment, the motive or intention of the person engaging in sexual harassment is irrelevant.

7. What is a hostile work environment on the ground of sex

7.1 A worker – or a visitor to the workplace (for example, a HSU member) – is subjected to a hostile work environment on the ground of sex when the worker is subject to conduct that can reasonably be considered to be offensive, intimidating or humiliating to a person on the basis of sex, even if that conduct is not directed at them.

7.2 Examples of conduct amounting to subjecting a worker to a hostile work environment could include:

- General banter or innuendo in the workplace of a sexual or offensive nature;
- Offensive jokes which result in one sex feeling unwelcome or excluded;
- The presence of sexually suggestive material in the workplace.

7.3 It is important to note that all visitors to the workplace – not just workers – can be subjected to hostile work environments.

8. What is victimisation

8.1 A worker is subjected to victimisation when, relevantly, they suffer a detriment, or the threat of a detriment, because they make a complaint of workplace sex discrimination, including workplace sexual or sex-based harassment, including by instigating proceedings under the SD Act or the FW Act. Such actions may also constitute a breach of the general protections (adverse action) provisions of the FW Act.

8.2 Examples of victimisation could include (depending on the context, namely if it constitutes a detriment to them) a worker being dismissed, demoted, stood down, having their roster changed, losing shifts, being removed from a particular project, being directed to perform only office-based work when they usually attend worksites, and so on, because they have raised a complaint of, for example, workplace sexual harassment.

9. Rights and responsibilities of workers

9.1 HSU workers have a right to a safe, inclusive, and equitable working environment free from discrimination and sexual and sex-based harassment. They also have a right to be able to report concerns or allegations of workplace sex discrimination, and to have those concerns or allegations dealt with, in a fair, supportive, proportionate, confidential and timely way free from any form of victimisation.

- 9.2 HSU workers have a responsibility to each other as well as to members, visitors to the workplace and other persons they deal with in the course of their work, not to engage in any kind of unwanted conduct of a sexual nature or related to someone's sex that may offend, humiliate or intimidate.
- 9.3 It is important to note that whether or not the conduct is intended to offend humiliate or intimidate is irrelevant. It does not matter if, for example, someone has good intentions (like thinking they are paying someone a compliment), is just joking or having fun, or is intoxicated. Excuses do not matter.
- 9.4 HSU workers have a responsibility to comply with reasonable workplace sex discrimination related instructions, policies or procedures put in place by the HSU (including this Policy).
- 9.5 Where an HSU worker is the subject of a complaint of workplace sex discrimination, or fails to comply with a workplace sex discrimination related direction or policy (including this Policy), they have a right to a fair process in the manner the complaint is dealt with. Where complaints of workplace sex discrimination are made out, workers may be subject to disciplinary outcomes up to and including termination of employment, cancellation of contracts in the case of contractors or subcontractors, or termination of memberships in the case of members.

10. Responsibilities of the HSU

- 10.1 The HSU has a responsibility to not only refrain from engaging in workplace sex discrimination in relation to its workers, but also to take all reasonable steps to prevent workplace sex discrimination from occurring to and/or by workers, members and others in the course of work for the HSU.
- 10.2 This includes managing the risk of workplace sex discrimination by following the risk management process outlined at section 11 of this policy, having a clear process for reporting concerns or complaints of workplace sex discrimination as outlined at section 12 of this policy, having a clear process for dealing with reports of concerns or complaints of workplace sex discrimination as outlined at section 13 of this policy, and provision of information with respect to relevant support services as outlined at section 14 of this policy.
- 10.3 If the HSU does not take all reasonable steps to prevent workplace sex discrimination it can also be held legally responsible for the actions of its workers if it occurs.

11. Managing the risk of workplace sex discrimination – stopping it before it happens

- 11.1 Taking all reasonable steps to eliminate workplace sex discrimination involves, first, identifying the risks specific to the HSU context, second, assessing those risks, and third, identifying steps or measures to manage or eliminate those risks as far as possible.

Identifying risks

- 11.2 The HSU recognises that employees are regularly required to work offsite and to engage with various stakeholders which may increase their risk of experiencing workplace sex discrimination. In the result, employees may face risks of workplace sex discrimination not just in their regular place of work, but at worksites, HSU branch offices, functions, meetings, conferences, consultations, courts and tribunals and so on.
- 11.3 The HSU recognises that other workers it engages – including contractors and subcontractors, and which may include members acting as volunteers – may face risks of workplace sex discrimination on HSU premises or offsite at function or meeting venues.
- 11.4 HSU employees and workers may face risks of workplace sex discrimination from fellow employees and workers, contractors or subcontractors engaged by the HSU, event staff, catering staff, cleaning staff, external stakeholders, external National Executive members, National Councillors, officials, guests at functions, branch staff, members, patients or clients at worksites, staff and management at worksites, and so on, who they come across in the course of performing work for the HSU.
- 11.5 The HSU also recognises that its workers who are female, young, LGBTIQ+, Aboriginal and Torres Strait Islander, pregnant, have a disability, from culturally and linguistically diverse backgrounds, migrant workers or temporary visa workers, and/or in insecure working arrangements (including casual, part-time, or fixed term contracts) are more likely to experience workplace sex discrimination.

Assessing risks

- 11.6 The HSU recognises it is necessary to understand the nature of the harm the hazards identified could cause, how serious the harm could be, and the likelihood of the harm occurring.

Steps or measures to control or eliminate risks

- 11.7 Within six months of this Policy being adopted by the National Executive, the HSU will form an inter-Branch working group and undertake a process of identifying common scenarios in which the risk of sex discrimination for workers may arise, and develop a set of template risk assessments for each scenario. The risks assessments will include the specific steps or measures that will be taken in each scenario to control or eliminate the risk of sex discrimination.
- 11.8 Once completed, the HSU will use (and make accessible to all branches to use) the templates as a starting point for controlling or eliminated the risk of sexual harassment to its workers in all range of scenarios. For example, when directing employees to attend member worksites, when booking conference facilities and engaging subcontractors, or when sending members to Canberra, and so on.

12. Reporting of concerns or complaints

- 12.1 The HSU is committed to preventing as far as possible workplace sex discrimination from occurring. However, in the event that complaints or concerns arise, the HSU is committed to addressing matters early.
- 12.2 The HSU recognises that workplace sex discrimination, including sexual harassment and sex-based discrimination, is seriously underreported across the workforce. The HSU also acknowledges that a person's experience of reporting, the type of response they receive and the supports available can all influence the effect that workplace sex discrimination can have on them.
- 12.3 The HSU takes concerns or complaints about workplace sex discrimination seriously and encourages workers to report concerns or complaints about workplace sex discrimination.
- 12.4 Within six months of this Policy being adopted by the National Executive, the National Secretary (or the relevant Branch Secretary, should this policy be adopted by the Branch as per the introduction of this policy under the heading "Branch Policy") will nominate a senior employee to be the Sex Discrimination and Sexual Harassment Contact Officer (**Contact Officer**) and provide that person with appropriate training and resources.
- 12.5 The name and contact details of the Contact Officer will be made accessible to all workers including by being displayed on a notice board in the workplace. The Contact Officer will be identified at external events to ensure all workers have a clear understanding of who to contact.
- 12.6 Acknowledging that concerns or complaints about workplace sex discrimination can be complex, sensitive and potentially volatile, workers will be able to report concerns or complaints related to workplace sex discrimination to the Contact Officer in any manner they feel comfortable – formal, informal, anonymously or confidentially, verbally or in writing.

13. Process for responding to reports

- 13.1 The HSU acknowledges that the way a worker's experience of reporting and the type of response they receive can influence the effects workplace sex discrimination, including sexual and sex-based harassment, will have on them. It is important that workers' reports are not excused, trivialised or dismissed. To that end, the HSU is committed to responding to reports quickly and fairly in a way that supports workers.
- 13.2 Within two business days of receiving a concern or complaint, the Contact Officer will contact the worker who made the concern or complaint to arrange a time to discuss the matter.

13.3 The concern or complaint may then be dealt with in an informal or formal manner.

Informal processes

13.4 Informal procedures may be appropriate, for example:

- Where the concern or complaint is of a less serious nature;
- Where the worker reporting the concern or complaint wishes to pursue an informal resolution; or
- Where the parties are likely to have ongoing contact and the worker reporting the concern or complaint wishes to pursue an informal resolution so that the working relationship can be sustained.

13.5 Informal ways of dealing with concerns or complaints emphasise resolution rather than factual proof or substantiation of a complaint and can include (but is not limited to) the following:

- The worker reporting the concern or complaint wishes to deal with the situation themselves but may seek advice on possible strategies from the Contact Officer;
- The worker reporting the concern or complaint may ask the Contact Officer to speak to the person the subject of the complaint on their behalf. The Contact Officer may then privately convey the worker's concerns, and reiterate the HSU's Workplace Sex Discrimination and Sexual Harassment Policy;
- Where the person the subject of a complaint admits the behaviour, the complaint may be resolved through conciliation or counselling of the person without the need for further investigation.

Formal Processes

13.6 Formal procedures may be appropriate, for example:

- Where informal attempts at resolution have failed;
- The complaint involves serious allegations of misconduct and informal resolution could compromise the rights of the parties;
- The complaint is against a more senior member of staff, including an Elected Official;
- The person alleging harassment also alleges victimisation;
- The allegations are denied and the worker who has made the complaint wishes to proceed and investigation is required to substantiate the complaint; or
- The person alleging sexual harassment wishes to make a formal complaint.

13.7 Formal ways of dealing with concerns or complaints focus on proving whether a complaint is substantiated. The process will usually involve:

- The worker who raised the concern or complaint will be interviewed and the allegations particularised in writing;
- The allegations are conveyed to the person the subject of the complaint;
- Relevant allegations made during the investigation are made known to both the worker reporting the concern or complaint and the person the subject of the concern or complaint, with an opportunity to respond;
- The person the subject of the complaint will be given the opportunity to respond to and defend themselves against the allegations;
- If there is a dispute over the facts, statements from any witnesses and other relevant evidence is gathered. (Note 1: a formal complaint should not be dismissed on the ground that no one saw or heard the incident occur noting that, given the nature of the conduct, there are often no direct witnesses.) (Note

2: other evidence that may be relevant may include evidence the worker reporting the complaint discussed their concerns with someone else, personnel records e.g. sudden increase in sick leave, complaints or information provided by other employees about the behaviour of the person the subject of the complaint, records kept by the worker making the complaint, and so on.);

- A finding is made as to whether the complaint has substance. (Note: findings should be based on the balance of probabilities – that is, that it is more probable than not that the conduct did or did not occur.);
- A written report documenting the investigation process, the evidence, the finding/s and a recommended outcome/s is submitted to the National Secretary (or the relevant Branch Secretary, should this policy be adopted by the Branch as per the introduction of this policy under the heading “Branch Policy”.) (Note: if the National Secretary (or relevant Branch Secretary) is the subject of a complaint, the written report will be submitted to the National Executive or Branch Committee of Management, as the case may be);
- The National Secretary (or the relevant Branch Secretary, should this policy be adopted by the Branch as per the introduction of this policy under the heading “Branch Policy”) implements the recommended outcome/s or decides on an alternative course of action. (Note: if the National Secretary (or relevant Branch Secretary) is the subject of a complaint, the National Executive or Branch Committee of Management, as the case may be, will decide on the course of action);
- Outcomes will vary depending on factors such as the severity or frequency of the conduct, the wishes of the worker reporting the concern or complaint, whether the person the subject of the complaint could have been expected to know that such conduct was a breach of this Policy, the level of contrition, and whether there had been any prior incidents or warnings, and may include (but are not limited to) any combination of the following:
 - Counselling;
 - Disciplinary action (e.g. demotion, transfer, suspension, probation, dismissal or termination of contract);
 - Official warnings that are noted on a personnel file;
 - Formal apologies;
 - Conciliation/mediation conducted by an impartial third party where the parties to the complaint agree to a mutually acceptable resolution;
 - Reimbursing any costs associated with the conduct;
 - Re-crediting any leave taken as a result of the conduct.

- 13.8 To ensure consistency and fairness, all steps involved in a formal process must be documented and the parties clearly informed about the processes involved in considering a complaint in advance.
- 13.9 The investigation may be carried out by the Contact Officer or an external provider engaged for that purpose (for example, where the complaint is serious or involves multiple parties, or where the Contact Officer feels conflicted). Where a complaint involves an Elected Official, the investigation will always be referred to an external provider.
- 13.10 Workers are not required to exhaust informal attempts at resolution before formal action commences. Workers have a right to formalise their complaint or approach an external agency, such as the Australian Human Rights Commission, at any time.

Unsubstantiated or unpursued complaints

- 13.11 It is important to note that even if there is not enough evidence for a complaint to be substantiated, it does not mean that the conduct did not occur or that the worker reporting the concern or complaint is untruthful. Findings may be that the conduct did or did not occur, or that it was not possible to make a conclusive finding.
- 13.12 A worker who reports a concern or complaint, substantiated or not, will not be disadvantaged in any way in the absence of strong evidence that the complaint was vexatious or malicious.
- 13.13 If a worker who reports a concern or complaint does not want to proceed with a formal or informal complaint, or where a complaint is unsubstantiated for any reason, the Contact Officer or National Secretary (or the relevant Branch Secretary, should this policy be adopted by the Branch as per the introduction of this policy under the heading "Branch Policy") may nonetheless take action including (but not limited to) the following:
- Reviewing the HSU's internal processes for preventing and responding to workplace sex discrimination;
 - Providing training and reminding workers of their general obligations not to sexually harass others;
 - Following up with the worker who reported the concern or complaint within a period of two months from the date the concern or complaint was reported to check whether their concerns remains, and to monitor the relationships involved.

14. Resources

- 14.1 The HSU will make accessible to all workers a list of relevant resources and support services, including by posting the list on a notice board in the workplace.

15. Compliance and review of this policy

- 15.1 A substantial or repeated breach of this policy by a Union Official / Officer or employee covered by the scope of this policy will be deemed to be a disciplinary offence, in the case of an employee, or misconduct under the rules of the HSU, in the case of a National Officer.
- 15.2 At least every two years, the National Executive will undertake a review of the operation of this Policy.
- 15.3 The National Secretary, and the relevant Branch Secretary, will ensure that all relevant policies and procedures are made available to all Officers and employees and that appropriate training (including an induction process) is offered to ensure they understand this Policy and procedures and their own responsibilities.

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