



ANTI DISCRIMINATION  
COMMISSION QUEENSLAND

**MANAGEMENT OF  
POTENTIAL WORKPLACE  
HARASSMENT OF  
TRAINERS**

**HR 01/08**

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## 1. INTRODUCTION

The ADCQ is committed to ensuring a safe work environment for officers working away from the ADCQ offices. This includes officers providing training sessions away from the ADCQ premises, particularly in rural and remote regions.

This policy guideline aims at managing risks through the use of proactive techniques to protect its officers from unnecessary injuries and distress.

## 2. OBJECTIVE

- To detail arrangements in place by the ADCQ to ensure a safe work environment for trainers working away from the ADCQ premises.
- To detail the processes to be followed to manage situations where trainers may potentially be subjected to risks, including workplace harassment, whilst conducting training.

## 3. AUTHORITY

- *Workplace Health and Safety Act 1995 and Regulations.*

## 4. PERSONAL SAFETY OF TRAINERS

### Background

Several times over a number of years, a number of trainers have reported being treated badly by participants in specific training sessions, and having felt a significant degree of stress as a result. The incidents involved behaviour that may fall within the definition of workplace harassment, or bullying.

The incidents have prompted the development of these guidelines to deal with any potential incidents in the future.

### Workplace harassment

Workplace harassment is defined as:

- unwelcome, repeated treatment of another person that offends, intimidates, humiliates or threatens;
- in circumstances where a reasonable person would think it offensive, intimidating, humiliating or threatening;
- and does not include reasonable management action.

Workplace harassment can be unlawful under discrimination law if the behaviour is linked to a ground under the *Anti-Discrimination Act*, or is sexual in nature.

Workplace harassment is regulated under the *Workplace Health and Safety Act* and requires a risk management approach. The approach requires the ADCQ to:

- identify any hazard;
- assess any risk;

- consider preventative control measures;
- implement control measures;
- assess the effectiveness of measures.

The ADCQ has undertaken such a risk management approach. In identifying the commonalities of the hazardous situation, the hazard could be identified generally as one of placing trainers in hostile environments.

In the incidents mentioned above, there were some commonalities:

- each venue was in a regional/rural/remote area;
- each venue could be identified as being somewhat isolated;
- each workplace had quite a large workforce;
- each workplace could be described as having its own culture;
- each involved a male-dominated workforce although with both male and female participants;
- each is primarily engaged in industrial type work ;
- each on-site visit involved the delivery of multiple training sessions to staff;
- many of the workforces could generally be described as ‘unconverted’ to anti-discrimination principles;
- each trainer was on their own;
- in two cases, the trainers were required to stay overnight at the site;
- each venue required significant travel to reach, either by car, plane or both.

The hazard could therefore be more specifically identified as sending solo trainers to reasonably isolated parts of Queensland, to conduct multiple training sessions for a large workforce in workplaces which have their own particular work cultures.

The ADCQ now requires its training officers and their managers to implement the measures outlined in this policy guideline in order to manage the risks.

## **5. IMPLEMENTATION OF CONTROL MEASURES TO ENSURE SAFETY OF TRAINERS**

The following of measures have been introduced to try to minimise the potential likelihood of workplace harassment occurring, and to minimise the impact on trainers if it should occur.

These include trainers carefully assessing the potential job and implementing specific steps before undertaking work. In the case of rural and remote training requests, **the assessment of the job should be done jointly by both the trainer and their manager before accepting the request.** The assessment should take into account the previous history with the company, the number of sessions to be delivered, travel arrangements and time, and the provision of emergency contact phone numbers to the trainer.

In each case the trainer and the manager may consider, and where appropriate action the following:

- refuse to accept a training booking (and offering them *Fairness – Everyone’s Business*’ as an alternative;
- market the ADCQ’s training cd-rom *Fairness – Everyone’s Business*, so less on-site training is required;
- ensure ADCQ (and the trainer) has an on site contact person and phone number in the company;
- send two trainers to conduct the training;
- conduct the training in parts (eg over two visits rather than one) to reduce the potential impact of delivering multiple sessions over a number of days;
- ensure the training policy strategy is implemented i.e. conducting training with managers/supervisors first to ensure they take responsibility where appropriate, then training staff, even if this involves more than one visit;
- conduct some training with ADCQ training staff (both before travel to specific venues, and more generally) on steps to be taken should an incident arise. This might involve some sort of ‘script’ to terminate the session, a reporting procedure (to the company) and/or how to leave the situation safely.

In the case of rural and remote training the trainer and manager **must**:

- ensure the trainer carries a mobile phone. If this is a personal phone, the Commission will reimburse the trainer for any work-related calls. Otherwise, trainers need to take the office mobile phone. The trainer must check with the company what networks have coverage in their location prior to undertaking travel to that location;
- ensure all precautions are taken to ensure staff safety on-site (such as contact person on-site, phone numbers etc);
- ensure the trainer has phone numbers on hand for out of hours or emergency contact. This should include the after-hours Employee Assistance Scheme phone number (1800 803 374), and those ADCQ staff willing to be contacted should the need arise;
- agree on a mutually suitable time for the ADCQ office to contact the trainer each day while they’re away, or alternatively the trainer to phone into the ADCQ office at the end of each day for possible debrief/support.

If any potential workplace harassment occurs at any training session, the trainer will report the incidents to their manager to:

- review with the trainer the effectiveness of the measures implemented prior to and at the training session;
- communicate with company after an incident, explore the issues, explain the problems, seek their assurance that there’ll be no repeat, and outlining steps to be taken for any future training booking. As a final resort, consider writing to the company outlining our concerns.
- keep a list of ‘problem’ companies so a record is kept for future dealings.

**6. OTHER RELATED POLICIES**

Security Protocol.

**7. REVIEW**

This policy will be reviewed 12 months from approval.

**8. FURTHER INFORMATION**

For further information or assistance contact the Manager, Support Services, on 3247 0929.