

NEWTOWN DOJO MEMBER PROTECTION POLICY

PREFACE

The aim of this Member Protection Policy (MPP) is to safeguard the rights and to protect the health, safety and wellbeing of all Newtown Judo Club (NJC) members. NJC is committed to ensuring all individuals are treated fairly and without prejudice.

NJC is committed to providing an environment safe for all members that is free from harassment and abuse (verbal or otherwise), and has a focus on promoting respectful and positive behaviour and values. The MPP is designed to prevent inappropriate behaviour by any member and to provide a defined process for addressing complaints. This MPP provides everyone involved in the organisation with clear guidelines for appropriate and ethical behaviour.

INTRODUCTION

- NJC is committed to the values of:
- Respect, Courtesy and Sincerity
- Diversity, Inclusion and Friendship
- Consideration and Positivity

All members are expected to co-operate in establishing and conducting a quality program of traditional martial arts. They are expected to:

Work towards the positive promotion of martial arts in the community.

Behave in a dignified manner whilst representing NJC in any capacity and that personal conduct will always be such as to uphold and not injure the standing and reputation of NJC within the community.

Refrain from the misuse of any official position for personal gain by way of exaggerated or unsubstantiated claims, fraudulent practice or sexual harassment.

Adhere to any official dress code or badging requirements whilst representing NJC.

Neither possess, nor use, prohibited drugs or any banned substances, nor participate in any activity that is illegal or contrary to the policies or interests of NJC.

Respect the rights of all people involved in martial arts regardless of gender, race, religion or social status.

Endeavour to regularly improve and upgrade knowledge and professionalism as a representative of the club.

PURPOSE OF THIS POLICY

The purpose of this MPP is to provide guidelines for the protection of the health, safety and wellbeing of all NJC members and anyone who participates in the activities of NJC. It is intended to maintain ethical and informed decision-making and responsible behaviour within our sport. It outlines our commitment to a person's right to be treated with respect and dignity and to be safe and protected from abuse.

This MPP informs everyone involved in our sport at all levels of his or her legal and ethical rights and responsibilities and the standards of behaviour that are required.

This MPP sets out the procedures to be followed in dealing with Child Abuse, Harassment and other forms of inappropriate behaviour in an effective, appropriate and timely manner. This MPP provides a procedure for informal and formal resolution of complaints. As part of this commitment, NJC will take disciplinary action against any person or organisation bound by this policy if they breach same.

WHO THIS POLICY APPLIES TO

This policy applies to the following people whether they are in a paid or unpaid/voluntary capacity:

All members of NJC including Life Members, Honorary Members and Associate Members of NJC

- Persons appointed or elected to the executive of NJC, and its committees and sub-committees
- Employees of NJC
- Support personnel (appointed or elected)
- Instructors, coaches and assistant coaches
- All athletes

- Any other person including spectators, parents/guardians and sponsors, who or which agree in writing (whether on a ticket, entry form or otherwise) to be bound by this policy

RESPONSIBILITIES OF THE ORGANISATION

NJC shall:

- Adopt, implement and comply with this policy
- Make such amendments to its Constitution, Rules or Policies necessary for this policy to be enforceable
- Publish, distribute and promote this policy and the consequences of breaches
- Promote and model appropriate standards of behaviour at all times
- Promptly deal with any breaches or complaints made under this policy in a sensitive, fair, timely and confidential manner
- Apply this policy consistently
- Recognise and enforce any penalty imposed under this policy
- Ensure that a copy of this policy is available or accessible to the persons to whom this policy applies
- Monitor and review this policy at least annually.

INDIVIDUAL RESPONSIBILITIES

Individuals bound by this policy are responsible for:

- Making themselves aware of the policy and complying with its standards of behaviour
- Complying with our screening requirements and any state/territory Working with Children checks/National police checks
- Placing the safety and welfare of children above other considerations
- Cooperating in providing a discrimination, child abuse and harassment free sporting environment
- Being accountable for their behaviour

- Following the procedures outlined in this policy if they wish to make a complaint or report a concern about possible child abuse, discrimination, harassment or other inappropriate behaviour
- Complying with any decisions and/or disciplinary measures imposed under this policy
- understanding the possible consequences of breaching this policy.

CHILD PROTECTION POLICY

NJC is committed to the safety and wellbeing of all children and young people accessing our services. We support the rights of the child and will act without hesitation to ensure a child safe environment is maintained at all times. We also support the rights and wellbeing of our members and encourage their active participation in building and maintaining a secure environment for all participants.

NJC recognises that our members provide a valuable contribution to the positive experiences of children involved in our sport. NJC aims to continue this and to take measures to protect the safety and welfare of children participating in our sport by:

- Prohibiting any form of abuse against children
- Ensuring people have completed a satisfactory Working with Children Check, where the state/territory laws require this. (State/territory requirements Part B of this policy)
- Promoting and enforcing our codes of behaviour, particularly for roles associated with juniors
- Responding to all reports and complaints promptly and confidentially
- Making policies regarding Child Protection readily available.

All allegations of child abuse will be dealt with promptly, seriously, sensitively and confidentially. A person will not be victimised for reporting an allegation of child abuse and the privacy of all persons concerned will be respected. Our procedures for handling allegations of child abuse are outlined below under Procedures and Reporting Documents/Forms in this policy.

If anyone bound by this policy reasonably suspects that a child is being abused by his or her parent/s, they are advised to contact the relevant government department

for youth, family and community services in their State/Territory. A person shall not be victimised for reporting possible child abuse and the privacy of all persons concerned will be respected.

IDENTIFY AND ANALYZE RISK OF HARM

NJC shall adopt practices that reduce risks and provide the greatest opportunity of having a child safe environment. NJC necessitates that any child who is abused or is reasonably suspected of being abused by someone within our sport report it immediately to a Director of NJC or the Senior Instructor, the police or the relevant government bodies. Descriptions of the sorts of activity which may be considered abuse can be found below under Dictionary.

Develop Codes of Conduct for Adults and Children

NJC will ensure that the organisation has codes of conduct that specify standards of conduct and care when dealing and interacting with children, particularly those in NJC's care. NJC will also implement a code of conduct to address appropriate behaviour between children.

The code(s) of conduct will set out professional boundaries, ethical behaviour and unacceptable behaviour. (See below)

Choose Suitable Employees and Volunteers

NJC will ensure that the organisation takes all reasonable steps to ensure that it engages the most suitable and appropriate people to work with children (in prescribed positions).

This may be achieved using a range of screening measures. Such measures will aim to minimise the likelihood of engaging (or retaining) people who are unsuitable to work with children.

NJC will ensure that working with children checks/criminal history assessments are conducted for instructors, vouches and volunteers working with children, where an assessment is required by law.

If a criminal history report is obtained as part of their screening process, NJC will ensure that the criminal history information is dealt with in accordance with relevant state requirements.

Support, Train, Supervise and Enhance Performance

NJC will ensure that volunteers and employees who work with children or their records have ongoing supervision, support and training such that their performance is developed and enhanced to promote the establishment and maintenance of a child-safe environment.

Empower and Promote the Participation of Children in Decision-Making And Service Development

NJC will promote the involvement and participation of children and young people in developing and maintaining child-safe environments.

Report and Respond Appropriately To Suspected Abuse and Neglect

NJC will ensure that volunteers and employees are able to identify and respond to children at risk of harm.

NJC will make all volunteers and employees aware of their responsibilities under respective state laws if they have suspicion on reasonable grounds that a child has been or is being abused or neglected (see below).

In addition to any legal obligation, if any person feels another person or organisation bound by this policy is acting inappropriately towards a child or is breaching the code'(s) of practice set out they may make an internal complaint. Please refer to our complaints procedure outlined below in this policy. This will explain what to do about the behaviour and how NJC will deal with the problem.

Taking Images of Children

Images of children can be used inappropriately or illegally. NJC requires that individuals and associations, wherever possible, obtain permission from a child's parent/guardian before taking an image of a child that is not their own and ensure that the parent knows the way the image will be used. However the taking of images of children in the dojo or in competition or any other NJC function wearing full martial arts uniform, tracksuit or other appropriate clothing is to be expected and shall not be considered of itself a breach of this policy. We also require the privacy of others to be respected and the use of camera phones, videos and cameras inside changing areas, showers and toilets is forbidden.

If NJC uses an image of a child it will avoid naming or identifying the child or it will, wherever possible, avoid using both the first name and surname. We will not display personal information such as residential address, email address or telephone numbers without gaining consent from the parent/guardian. We will not display information about hobbies, likes/dislikes, school, etc. as this information can be used as grooming tools by pedophiles or other persons. We will only use appropriate images of a child, relevant to our sport and ensure that the child is suitably clothed in a manner that promotes the sport, displays its successes, etc. Where possible we will seek permission to use these images.

Any images taken for the expressed purpose of grading cards and certificates shall only be used for that purpose.

ANTI-DISCRIMINATION AND HARASSMENT POLICY

NJC opposes all forms of harassment, discrimination and bullying and aims to provide a sporting environment where all involved are treated with dignity and respect. This includes treating or proposing to treat someone less favourably because of a particular characteristic; imposing or intending to impose an unreasonable requirement, condition or practice which has an unequal or disproportionate effect on people with a particular characteristic; or any behaviour that is offensive, abusive, belittling, intimidating or threatening – whether this is face-to-face, indirectly or via communication technologies such as mobile phone and computers. Some forms of harassment, discrimination and bullying, based on personal characteristics such as those listed in the Dictionary (see below), are against the law.

If any person feels they are being harassed or discriminated against by another person or organisation bound by this policy, please refer to our complaints procedure outlined below in this policy which explains what to do about the behaviour and how NJC will deal with the problem.

Sexual Relationships

NJC takes the view that intimate relationships (whether or not of a sexual nature) between instructors and students, or coaches students, while not necessarily constituting harassment, may have harmful effects on the student, on other students and on the club's public image. Such relationships may be perceived to be exploitative because there is usually a disparity between instructors, coaches and

students in terms of authority, maturity, status, influence and dependence. Given there is always a risk that the relative power of the instructor or coach has been a factor in the development of such relationships, they should be avoided at all levels. In the event that a student attempts to initiate an intimate relationship, the instructor or coach must take personal responsibility for discouraging such approaches, explaining the ethical basis for such actions.

The coach or athlete may wish to approach the NJC's executive or other designated person if they feel harassed. Our complaints procedure is outlined below in this policy.

Pregnancy

Everyone bound by this policy must treat pregnant women with dignity and respect and any unreasonable barriers to participation by them in our sport should be removed. We will not tolerate any discrimination or harassment against pregnant women.

While many sporting activities are safe for pregnant women, there may be particular risks that apply to some women during pregnancy. Those risks will depend on the nature of the sporting activity and the particular pregnant woman's circumstances. Pregnant women should be aware that their own health and wellbeing, and that of their unborn children should be of utmost importance in their decision making about the way they participate in our sport.

NJC recommends that pregnant women wanting to participate in our sport consult with their medical advisers, make themselves aware of the facts about pregnancy in sport, and ensure that they make informed decisions about participation. We will only require pregnant women to sign a disclaimer if we require other participants to sign one in similar circumstances. We will not require women to undertake a pregnancy test.

Gender Identity

Everyone bound by this policy must treat people who identify as transgender fairly and with dignity and respect. This includes acting with sensitivity and respect where a person is undergoing gender transition. We will not tolerate any unlawful discrimination or harassment of a person who identifies as transgender or transsexual or who is thought to be transgender. Descriptions of the types of

behaviour which could be regarded as transgender discrimination or harassment are provided in the Dictionary (see below).

NJC recognises that the exclusion of transgender people from participation in sporting events and activities has significant implications for their health, well-being and involvement in community life. In general NJC will facilitate transgender persons participating in our sport with the gender with which they identify.

NJC also recognises there is debate over whether a male to female transgender person obtains any physical advantage over other female participants. This debate is reflected in the divergent discrimination laws across the country. If issues of performance advantage arise, NJC will seek advice on the application of those laws in the particular circumstances.

NJC is aware that the International Olympic Committee (IOC) has established criteria for selection and participation in the Olympic Games. Where a transgender person intends competing at an elite level, we will encourage them to obtain advice about the IOC's criteria which may differ from the position taken by NJC.

Drug testing procedures and prohibitions also apply to people who identify as transgender. A person receiving treatment involving a Prohibited Substance or Method, as described on the World Anti-Doping Agency's Prohibited List, should apply for a standard Therapeutic Use Exemption.

Alcohol Policy

NJC recommends that members adhere to strict guidelines regarding the responsible consumption of alcohol. Generally, alcohol should not be available nor be consumed at a sporting event at which children under 18 are participants in the sport. Responsible service and consumption of alcohol should apply to any alcohol to be consumed after the competition has concluded, including light alcohol and soft drinks always being available. Wherever possible, food should be available to be consumed when alcohol is available

Smoking Policy

The following policies should be applied to sporting and social events:

- No smoking shall occur at or near any sporting event or competition involving persons under the age of 18. This policy shall apply to instructors, coaches, players, trainers, officials and volunteers
- Social functions shall be smoke free, with smoking permitted at designated outdoor smoking areas
- Instructors, coaches, other officials and students will refrain from smoking and remain smoke free while involved in an official capacity for any NJC function.

Cyber Bullying/Safety

Bullying and harassment in all forms is regarded by NJC as unacceptable. Given the emergence of new telephone and internet social networks, the opportunity for unwanted and improper comments and statements has dramatically increased. Messages or statements made in these ways using these means of communication are largely instantaneous, and can easily be abused. Others may also manipulate a person by encouraging a statement to be made on Twitter or Facebook, for example, when the writer may be upset or vulnerable. Bullying has the potential to cause great anxiety and distress to the person who has been the target of any comments or statements. In some cases, bullying is regarded as a criminal offence punishable by imprisonment, amongst other things. Frustration at an instructor, referee, team-mate, coach, or sporting body should never be communicated on social network channels, but rather by way of reasoned and logical verbal and written statements and where appropriate, complaints, to the relevant controlling club, league or peak sporting body.

Social Networking Websites Policy

NJC acknowledges the emergence of new technology and communication mediums (new media), and wishes to enable such new media to be used to benefit the sport and its participants, and to applaud achievements. This can occur due to the immediate nature of communication to a wide audience using channels such as Facebook, Twitter, and SMS. However, participants within the sport need to be very mindful of a few key matters that could lead to inappropriate use of new media, at times unintended, and at other times without a proper understanding that once

comments are made or published, they are in public for a long time, and hard to take back (retract). Cautions NJC recommends:

- Do not include personal information of yourself or others in social media channels
- Do not use offensive, provocative or hateful language
- Use your best judgment – do not publish something that makes you the slightest bit uncomfortable, and never write/publish if you are feeling emotional or upset (or are intoxicated)
- Always ask for a person's permission before posting their picture on a social networking forum
- Never comment on rumours, do not deny or affirm them or speculate about rumours
- Always use social network forums to add value and promote the sport in a positive way
- Never fraudulently represent yourself as representative or official of NJC.

COMPLAINTS PROCEDURES

Complaints

NJC aims to provide a simple procedure for complaints based on the principles of procedural fairness (natural justice). Any person (a complainant) may report a complaint about a person/s or organisation bound by this policy if they reasonably believe that a person/s or organisation has breached this policy. Such complaints should be reported the Executive of NJC or other designated person

The lowest level at which a matter can be dealt with shall always be preferred.

All complaints will be dealt with promptly, seriously, sensitively and confidentially.

Individuals and organisations may also pursue their complaint externally under anti-discrimination, child protection, criminal or other relevant legislation.

Improper Complaints & Victimisation

NJC aims for our complaints procedure to have integrity and be free of unfair repercussions or victimisation against the person making the complaint. If at any

point in the complaints process the NJC Executive or senior instructor or designated person considers that a complainant has knowingly made an untrue complaint or the complaint is malicious or intended to cause distress to the person complained of, disciplinary action may be taken against the complainant.

NJC will take all necessary steps to make sure that people involved in a complaint are not victimised. Disciplinary measures can be imposed on anyone who harasses or victimises another person for making a complaint.

Mediation

NJC aims to resolve complaints with a minimum of fuss. Complaints may be resolved by agreement between the people involved with no need for disciplinary action. Mediation allows those involved to be heard and to come up with mutually agreed solutions.

Mediation may occur before or after the investigation of a complaint. If a complainant wishes to resolve the complaint with the help of a mediator, the NJC Executive, senior instructor or designated person will, in consultation with the complainant, arrange for a neutral third party mediator where possible. More information on the mediation process is outlined below.

What is a Breach of this policy?

It is a breach of this policy for any person or organisation to which this policy applies, to do anything contrary to this policy, including but not limited to:

- Breaching the Code of Conduct
- Bringing the martial arts and/or NJC into disrepute, or acting in a manner likely to bring the martial arts and/or NJC into disrepute
- Failing to follow NJC policies (including this policy) and procedures for the protection, safety and welfare of children
- Discriminating against, harassing or bullying (including cyber bullying) any person
- Victimising another person for reporting a complaint
- Engaging in a sexually inappropriate relationship with a person that they supervise, or have influence, authority or power over

- Verbally or physically assaulting another person, intimidating another person or creating a hostile environment within the sport
- Disclosing to any unauthorised person or organisation any NJC information that is of a private, confidential or privileged nature
- Making a complaint they knew to be untrue, vexatious, malicious or improper
- Failing to comply with a penalty imposed after a finding that the individual or organisation has breached this policy
- Failing to comply with a direction given to the individual or organisation during the discipline process.

Disciplinary Measures

If an individual or organisation to which this policy applies breaches this policy, one or more forms of discipline may be imposed. Any disciplinary measure imposed under this policy must:

- Be applied consistent with any contractual and employment rules and requirements
- Be fair and reasonable
- Be based on the evidence and information presented and the seriousness of the breach
- Be determined in accordance with our Constitution, By Laws, this policy and/or Rules of the sport.

Individual

Subject to contractual and employment requirements, if a finding is made by the Executive of NJC that an individual has breached this policy, one or more of the following forms of discipline may be imposed:

- A direction that the individual make a verbal and/or written apology
- A written warning
- A direction that the individual attend counselling to address their behaviour

- A withdrawal of any grading awards, scholarships, placings, records, achievements bestowed in any activities or events held or sanctioned by the NJC
- A demotion or transfer of the individual to another location, role or activity
- A suspension of the individual's membership or participation or engagement in a role or activity
- Termination of the individual's membership, appointment or engagement
- A recommendation that the NJC terminate the individual's membership, appointment or engagement
- In the case of an instructor, coach or official, a direction that the relevant state or national organisation deregister the accreditation of the coach or official for a period of time or permanently
- A fine
- Any other form of discipline that Executive of NJC considers appropriate.

Dictionary

This Dictionary sets out the meaning of words used in this policy and its attachments without limiting the ordinary and natural meaning of the words. State/Territory specific definitions and more detail on some of the words in this dictionary can be sourced from the relevant State/Territory child protection commissions or equal opportunity and anti-discrimination commissions.

Abuse is a form of harassment and includes physical abuse, emotional abuse, sexual abuse, neglect, and abuse of power. Examples of abusive behaviour include bullying, humiliation, verbal abuse and insults.

Child means a person who is under the age of 18 years

Child abuse involves conduct which puts children at risk of harm (usually by adults, sometimes by other children) and often by those they know and trust. It can take many forms, including verbal and physical actions and by people failing to provide them with basic care. Child abuse may include:

- Physical abuse by hurting a child or a child's development (e.g. hitting, shaking or other physical harm; giving a child alcohol or drugs; or training that exceeds the child's development or maturity)
- Sexual abuse by adults or other children where a child is encouraged or forced to watch or engage in sexual activity or where a child is subject to any other inappropriate conduct of a sexual nature (e.g. sexual intercourse, masturbation, oral sex, pornography including child pornography or inappropriate touching or conversations)
- Emotional abuse by ill-treating a child (e.g. humiliation, taunting, sarcasm, yelling, negative criticism, name calling, ignoring or placing unrealistic expectations on a child)
- Neglect (e.g. failing to give food, water, shelter or clothing or to protect a child from danger or foreseeable risk of harm or injury).

Complaint means a complaint made under this policy

Complainant means a person making a complaint.

Complaint Handler/Manager means a person appointed under this policy to investigate a Complaint

Discrimination means treating or proposing to treat someone less favourably because of a particular characteristic in the same or similar circumstances in certain areas of public life (Direct Discrimination), or imposing or intending to impose an unreasonable requirement, condition or practice that is the same for everyone, but which has an unequal or disproportionate effect on individuals or groups with particular characteristics (Indirect Discrimination). The characteristics covered by discrimination law across Australia includes:

- Age;
- Disability;
- Family/carer responsibilities;
- Gender identity/transgender status;
- Homosexuality and sexual orientation;

- Irrelevant medical record;
- Irrelevant criminal record;
- Political belief/activity;
- Pregnancy and breastfeeding;
- Race;
- Religious belief/activity;
- Sex or gender;
- Social origin;
- Trade union membership/activity.

Harassment is any type of behaviour that the other person does not want and that is offensive, abusive, belittling or threatening. The behaviour is unwelcome and a reasonable person would recognise it as being unwelcome and likely to cause the recipient to feel offended, humiliated or intimidated.

Unlawful harassment is sexual or targets a person because of their race, sex, pregnancy, marital status, sexual orientation or some other personal characteristic protected by law.

It does not matter whether the harassment was intended: the focus is on the impact of the behaviour. The basic rule is if someone else finds it harassing then it could be harassment. Harassment may be a single incident but is usually repeated. It may be explicit or implicit, verbal or non-verbal, and includes electronic cyber communication.

Discrimination and harassment are not permitted in employment (including volunteer and unpaid employment); when providing sporting goods and services including access to sporting facilities; when providing education and accommodation; the selection or otherwise of any person for competition or a team (domestic or international); the entry or otherwise of any player or other person to any competition and the obtaining or retaining membership of clubs and organisations (including the rights and privileges of membership).

Some exceptions to state and federal anti-discrimination law apply. Examples include:

- holding a competitive sporting activity for boys and girls only who are under 12 years of age or of any age where strength, stamina or physique is relevant
- not selecting a participant if the person's disability means he or she is not reasonably capable of performing the actions reasonably required for that particular sporting activity.

Requesting, assisting, instructing, inducing or encouraging another person to engage in discrimination or harassment may also be against the law.

It is also a breach of discrimination law to victimize a person who is involved in making a complaint of discrimination or harassment. Example: a player is ostracized by her male coach for complaining about his sexist behaviour or for supporting another player who has made such a complaint.

Public acts of racial hatred which are reasonably likely to offend, insult, humiliate or intimidate are also prohibited. This applies to spectators, participants or any other person who engages in such an act in public. Some states and territories also prohibit public acts that vilify on other grounds such as homosexuality, gender identity, HIV/AIDS, religion and disability – see vilification.

Mediator means an impartial/neutral person appointed to mediate Complaints.

Member means a person who has paid their annual fees to NJC or is a non-paying life time member.

Natural justice (also referred to as procedural fairness) incorporates the following principles:

- both the Complainant and the Respondent must know the full details of what is being said against them and have the opportunity to respond
- all relevant submissions must be considered
- no person may judge their own case
- the decision maker/s must be unbiased, fair and just
- the penalties imposed must be fair.

Police check means a national criminal history record check conducted as a pre-employment, pre-engagement or current employment background check on a person.

Policy, means this Member Protection Policy.

Respondent means the person who is being complained about.

Role-specific Codes of Conduct means standards of conduct required of certain roles (e.g. coaches).

Sexual harassment means unwanted, unwelcome or uninvited behaviour of a sexual nature which could reasonably be anticipated to make a person feel humiliated, intimidated or offended. Sexual harassment can take many different forms and may include unwanted physical contact, verbal comments, jokes, propositions, display of pornographic or offensive material or other behaviour that creates a sexually hostile environment.

Sexual harassment is not behaviour based on mutual attraction, friendship and respect. If the interaction is between consenting adults, it is not sexual harassment.

Sexual offence means a criminal offence involving sexual activity or acts of indecency including but not limited to (due to differences under state/territory legislation):

- Rape
- Indecent assault
- Sexual assault
- Assault with intent to have sexual intercourse
- Incest
- Sexual penetration of child under the age of 16
- Indecent act with child under the age of 16
- Sexual relationship with child under the age of 16
- Sexual offences against people with impaired mental functioning
- Abduction and detention

- Procuring sexual penetration by threats or fraud
- Procuring sexual penetration of child under the age of 16
- Bestiality
- Soliciting acts of sexual penetration or indecent acts
- Promoting or engaging in acts of child prostitution
- Obtaining benefits from child prostitution
- Possession of child pornography
- Publishing child pornography and indecent articles.

Transgender is a general term applied to individuals and behaviours that differ from the gender role commonly, but not always, assigned at birth. It does not imply any **specific form of sexual orientation**.

Victimisation means subjecting a person or threatening to subject a person to any detriment or unfair treatment because that person has or intends to pursue their rights to make any complaint including a complaint under government legislation (e.g. anti-discrimination) or under this Policy, or for supporting such a person.

Vilification involves a person or organisation doing public acts to incite hatred towards, serious contempt for, or severe ridicule of a person or group of persons having any of the attributes or characteristics within the meaning of discrimination. Public acts that may amount to vilification include any form of communication to the public and any conduct observable by the public.