NYANGATJATJARA ABORIGINAL CORPORATION
(trading as Nyangatjatjara College)
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ANTI-DISCRIMINATION, HARASSMENT & BULLYING POLICY

Status: Version 1	Supersedes: First version
Authorised by: Board Chair	Date of Authorisation: September 2026

Purpose
Nyangatjatjara College is committed to providing a safe, respectful, culturally secure, and discrimination-free learning and working environment across all campuses at Imanpa, Yulara, and Kaltukatjara (Docker River). This policy outlines the College's approach to preventing and responding to:

- discrimination
- harassment
- bullying
- victimisation

It ensures compliance with Northern Territory legislation, supports Anangu cultural safety, and guides staff in maintaining a workplace where all students, staff, families, Elders, visitors, and community members are treated with dignity.

Scope
This policy applies to:

- The Nyangatjatjara Aboriginal Corporation Board
- All College staff (full-time, part-time, casual, fixed-term)
- Volunteers, contractors, and visiting service providers
- Students across all campuses
- Any College-related activity on-site, off-site, online, or after hours
- All employment, recruitment, training, supervision, and performance processes

Legislative Framework
This policy is governed by:

- Anti-Discrimination Act 1992 (NT)
- Education Act 2015 (NT)
- Care and Protection of Children Act 2007 (NT) — mandatory reporting
- Work Health and Safety (National Uniform Legislation) Act 2011 (NT)
- Information Act 2002 (NT)
- Sex Discrimination Act 1984 (Cth)
- Racial Discrimination Act 1975 (Cth)
- Disability Discrimination Act 1992 (Cth)
- Australian Human Rights Commission Act 1986 (Cth)

All adults in the NT are mandatory reporters. All staff, contractors, and volunteers must hold a current Ochre Card.

Cultural Safety Commitment
Nyangatjatjara College operates on Anangu Country and is committed to:

- respecting cultural authority structures
- engaging Elders and community leaders in decision-making
- using interpreters where needed
- recognising Sorry Business, kinship obligations, and cultural protocols
- ensuring behaviour expectations are culturally safe and trauma-informed

Discrimination or disrespect toward Aboriginal cultural practices is strictly prohibited.

Definitions

Discrimination

Unfavourable treatment based on a protected attribute under NT law, including:

- race, colour, descent, national or ethnic origin
- disability
- sex, sexuality, gender identity, intersex status
- age
- pregnancy or breastfeeding
- marital status
- religious belief or activity
- parental or carer responsibilities
- association with someone who has a protected attribute

Discrimination may be:

- Direct — treating someone less favourably
- Indirect — imposing unreasonable conditions that disadvantage a group

Harassment

Unwelcome behaviour that humiliates, offends, intimidates, or creates a hostile environment. Harassment may be verbal, written, physical, or digital.

Examples include:

- intrusive questions
- derogatory comments
- offensive jokes or stereotypes
- digital harassment (messages, posts, images)

Sexual Harassment

Unwelcome sexual behaviour that could reasonably make a person feel offended, humiliated, or intimidated.

Examples include:

- sexual comments or jokes
- unwanted touching
- repeated requests for dates
- sexually explicit messages or images
- accessing or displaying sexual material at work
- behaviour that may constitute a criminal offence

A single incident is enough to constitute sexual harassment.

Bullying

Repeated, unreasonable behaviour that creates a risk to health and safety.

Examples include:

- threats, shouting, intimidation
- social exclusion
- spreading rumours
- constant criticism
- withholding information needed to do a job
- unreasonable work demands

Bullying is a breach of this policy and a WHS risk under NT law.

Victimisation

Treating someone unfairly because they:

- made a complaint
- supported someone else's complaint
- refused to participate in discriminatory behaviour

Victimisation is unlawful and will result in disciplinary action.

Gossip
Discussing complaints, investigations, or personal information outside authorised processes is prohibited and may result in disciplinary action.

Rights and Responsibilities
All Staff Have the Right To:

- work in a safe, respectful, discrimination-free environment
- raise concerns without fear of victimisation
- reasonable flexibility for cultural, family, or disability needs
- be treated with dignity and respect

All Staff Must:

- uphold this policy at all times
- model respectful behaviour
- support colleagues and students who experience discrimination or bullying
- maintain confidentiality
- report concerns promptly
- follow mandatory reporting obligations

Additional Responsibilities of Leaders (Principal, Managers, NAC Board)
Leaders must:

- model culturally safe and respectful behaviour
- ensure staff understand their obligations
- intervene early and appropriately
- ensure complaints are managed fairly and confidentially
- ensure no person is victimised for raising a concern
- ensure recruitment is merit-based and non-discriminatory
- consider flexible work requests fairly
- ensure all staff hold a current Ochre Card

Merit-Based Recruitment
Recruitment at Nyangatjatjara College is based on:

- merit
- capability
- alignment with College values
- ability to work respectfully in remote Aboriginal communities

It is unlawful to request information about protected attributes unless directly relevant to the role (e.g., gender for a same-sex support role under lawful exemptions).

Resolving Concerns and Complaints
Staff and students are encouraged to raise concerns early.

Concerns may be addressed through:

- informal resolution
- mediation
- formal complaint investigation

Complaints are managed under:

- NAC Complaints Handling Policy
- NT Education Act 2015 grievance requirements
- NT Child Safe Standards (2024)

Where behaviour involves harm or risk to a child, mandatory reporting applies immediately.

Breaches of This Policy
Breaches may result in:

- counselling
- formal warnings
- removal from duties
- termination of employment
- reporting to NT Police (where criminal behaviour occurs)
- reporting to Territory Families (where child harm is suspected)

Review

- **Review Date:** Every two (2) years
- **Next Review:** 2028
- **Policy Owner:** Nyangatjatjara College Aboriginal Corporation

Version	Date	Author	Changes made
1	September 2026	School Leadership	First version