



## **Diversity and Inclusion Policy**

### **1. Purpose**

School for Life Foundation (“SFL”) respects and values the diversity of its employees and stakeholders and is committed to actively support and promote a diverse and inclusive environment both within its workforce and throughout its educational operations. This policy describes SFL’s approach and commitment to diversity and inclusion and how these principles are promoted and embedded within SFL.

### **2. Scope and Responsibility**

This policy applies to all employees and volunteers working with SFL, along with contractors, consultants, interns, visitors and Board members and partner organisations with whom SFL interacts.

SFL also expects all partner organisations and providers to uphold these principles and urges them to adopt similar policies within their own businesses.

The Diversity and Inclusion Policy is overseen by School for Life’s Board of Directors, and administered by the CEO and COO.

### **3. SFL’s Commitment to Diversity and Inclusion**

SFL values the diversity of its employees and stakeholders, and recognises that diversity is supported and enhanced by an inclusive culture in its workforce and operations. SFL recognises that all people working in, visiting or being educated in SFL’s operational sites have the right to be treated with respect and fairness and enjoy an environment free from discrimination, harassment, bullying and other unacceptable or unlawful behaviour. This is a key feature of an inclusive culture. SFL is committed to finding ways to actively support and encourage a diverse and inclusive environment for its employees and stakeholders.

### **4. Definitions of Diversity and Inclusion**

Diversity describes the differences and uniqueness of all people, and includes knowledge, skills, experiences and perspectives of individuals and groups. It can refer to demographic characteristics such as age, gender, sexual orientation, gender identity, religion or race. Diversity can also refer to personal characteristics such as disability, medical condition, pregnancy or potential pregnancy or any other characteristics of an individual

While certain personal characteristics are protected against discrimination by law, valuing diversity is broader and involves the positive and proactive recognition and valuing of individual differences.

An inclusive operation:

- (a) Values the diversity of its employees and stakeholders;
- (b) Is free of discrimination, harassment, bullying and other unacceptable or unlawful behaviour;
- (c) Is fair and equitable; and
- (d) Upholds the right of every employee and stakeholder to be treated with respect and fairness

## **5. Promoting a Diverse and Inclusive Operation**

SFL recognises that the culture of its workplaces and operations is a product of the behaviour and conduct of its people and stakeholders. SFL sets clear expectations for leaders and employees regarding the actions, conduct and behaviours that support a diverse and inclusive operation. These expectations are described in this policy, the SFL Code of Conduct and other related documents, and are reinforced through general communication and targeted education.

SFL regularly consults with its employees and stakeholders about key areas and issues relating to diversity and inclusion and uses this information to improve existing processes and develop new initiatives. Leaders, employees and stakeholders are encouraged to speak up if they witness or are exposed to conduct or behaviour that is not consistent with this policy and SFL will investigate and address breaches appropriately.

At all times, SFL is cognisant of the special needs of those with disabilities, and seeks to promote their inclusion, human rights and empowerment. SFL will regularly liaise and consult with key stakeholders to ensure the needs of those with disabilities are understood and can be considered.

## **6. Affirmative Action**

Affirmative action initiatives are another way that SFL can promote diversity among its employees and stakeholders. Affirmative action describes initiatives that are targeted at removing barriers to people with particular characteristics, enabling them to compete equally for employment or educational opportunities, and addressing any disadvantages that may be present.

Affirmative action initiatives may focus on a particular group or individuals within a group who have been disadvantaged or are under-represented in SFL's operations.

## **7. Reporting**

SFL monitors its performance in the areas of diversity and including using appropriate measures and targets. Progress will be reported to, and discussed in various forums, including management meetings, at the Executive Team and by the Board of Directors, as appropriate.

SFL also captures, monitors and reviews complaints received related to breaches of this policy.

## **8. Examples of unacceptable or unlawful behaviour**

### **8.1 Discrimination**

Discrimination is any practice that makes distinctions between individuals or groups that disadvantages some people and / or advantages other people.

It is unacceptable, and potentially unlawful, to discriminate against someone based on any of the following “prohibited grounds” – gender, sexual orientation, race, nationality, ethnic origin, marital status, gender identity, age, relationship status, disability, family responsibilities, political views, medical record, irrelevant criminal record, pregnancy or potential pregnancy, religious beliefs, physical appearance, carers’ responsibilities.

Not all of these prohibited grounds are unlawful in all of the regions in which SFL operates, but these forms of discrimination are considered unacceptable at SFL. This policy does not deal with lawful discrimination such as rewarding high performance or choosing a qualified person over an unqualified person.

Discrimination can be direct or indirect. Direct discrimination is when someone is treated less favourably due to one of the prohibited grounds. Indirect discrimination occurs where a condition, requirement or practice is imposed that has the effect of disadvantaging one group of people in relation to another based on any of the prohibited grounds, and it is not reasonable in the circumstances to do so.

Intention is not a pre-requisite for discrimination to occur.

### **8.2 Harassment**

Harassment is any unreasonable, uninvited or unwelcome behaviour that a reasonable person would consider offensive, humiliating, intimidating or threatening to another person, or makes a place of operation uncomfortable and hostile for other stakeholders.

It is unacceptable and potentially unlawful to harass someone based on any of the prohibited grounds that relate to discrimination set out above.

Harassment may consist of an isolated incident or a series of incidents or be an ongoing pattern of behaviour. Harassment does not need to be intentional, nor does it need to be directed at a particular individual or group.

### **8.3 Sexual Harassment**

Sexual harassment is unreasonable, uninvited or unwelcome conduct of a sexual nature that makes another person or group of people feel offended, humiliated or threatened. Along with being unacceptable to SFL, in most jurisdictions SFL operates it is also considered unlawful.

Examples of sexual harassment may include:

- Unwelcome sexual advances
- Sexual or suggestive remarks
- Sexual propositions or repeated requests for dates

- Repeated or intrusive questions about someone's personal life
- Sexual jokes and innuendo
- Deliberate and unwanted touching of a personal nature
- Offensive telephone calls, emails, reading materials, screensavers, pictures etc
- Suggestive leering

## **8.4 Bullying**

Bullying is repeated, unreasonable behaviour directed towards another person or group of people that creates a risk to health and safety. Unreasonable behaviour is behaviour that a reasonable person, having regard to all the circumstances, would expect to humiliate, demean, victimise, threaten or undermine.

Bullying can be carried out verbally, physically or in writing (e.g. via email, social media or mobile phone apps). Bullying can be directed at a single person or a group of people.

Examples of bullying include but are not limited to:

- Unwanted physical contact
- Physical assaults or threats
- Verbal abuse including offensive language and / or shouting
- Isolating or excluding employees
- Taunting, teasing, sarcasm or insults
- Intimidating behaviour
- Constant and unreasonable or unconstructive criticism
- Humiliating others
- Spreading malicious rumours
- Initiation rites
- Any homophobic or transphobic comments

Reasonable management actions carried out in a fair way is not bullying. Bullying is not:

- Setting performance goals, standards and deadlines
- Informing an employee about unsatisfactory work performance
- Performance management processes properly carried out
- Informing an employee about inappropriate behaviour
- Constructive feedback
- Deciding not to select an employee for a particular role

## **8.5 Vilification**

Vilification is doing or saying something that creates, encourages or incites hatred, severe contempt for or severe ridicule of other people. Examples of grounds for vilification include but are not limited to:

- Race, ethnic or religious beliefs
- Sexual orientation or identity
- Medical status (e.g. HIV positive)

Vilification in any form is not appropriate and will not be tolerated in any way by SFL.

## **8.6 Victimisation**

A person is victimised when they are retaliated against, subjected to pressure, adverse comment, isolation or other detrimental behaviour. It is unacceptable to victimise a person for making a complaint about discrimination, harassment, bullying, vilification or victimisation, or to victimise someone for being involved in a complaint made by someone else or for supporting someone who has made such a claim.

## **9. Compliance**

SFL does not tolerate behaviours that undermine a diverse and inclusive operation, including but not limited to behaviours that are unacceptable / and or unlawful such as discrimination, harassment, bullying, vilification and victimisation.

SFL encourages all stakeholders to speak up about unacceptable and unlawful behaviour in its operations and supports stakeholders to do this by providing them with access to advice, support and a process to raise and resolve complaints.

SFL's preference is for a person to try first to address the behaviour directly with the perpetrator, if this is possible or appropriate. If it isn't possible or appropriate to address the issue directly, the person should raise the issue with their direct manager, another leader or with the COO.

SFL recognises the value of a diverse and inclusive operation to SFL's business success. Additionally, SFL has legal obligations under state, territory and federal legislation to provide a safe working environment that is free from discrimination, harassment, bullying and other unlawful behaviour. Consequently, SFL takes its commitment to encouraging and promoting a diverse operation seriously.

Breaches of this policy may result in disciplinary action, up to and including termination of employment.