



office of the
commissioner for
public employment

Preventing & Eliminating Workplace Bullying in the Northern Territory Public Sector Framework

*Bullying is NOT acceptable to anyone,
anytime, anywhere!*

April 2005



Northern Territory Government

MINISTER'S FOREWORD

This framework provides important information for everyone about bullying. Most importantly it provides information for all employees about the anti-bullying policy adopted by the Northern Territory Public Sector (NTPS).

As the largest employer in the Northern Territory the NTPS is making it known to all of its employees that workplace bullying or harassment is not acceptable by anyone, anytime, anywhere for any reason. Apart from being totally unacceptable behaviour, bullying or harassment is humiliating and distressing for the victims. At an organisational level bullying creates an intimidating and uncomfortable environment for other employees which impacts on staff morale, service quality, productivity and staff recruitment and retention.

This framework provides a strategy for preventing and eliminating workplace bullying in the NTPS. It also includes practical information and reference material for managers, supervisors and general staff in every agency. Individually and collectively we must all take responsibility to eliminate workplace bullying.

As the Minister responsible for employment and training I endorse this anti bullying framework. I also urge all employees to take the time to read this booklet and play your part in ensuring the NTPS is a professional workforce free from bullying and harassment in all workplaces.



The Hon Syd Stirling MLA
Minister for Employment, Education and Training

April 2005

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The Office of the Commissioner for Public Employment (OCPE) acknowledges the use of information from the Worksafe Victoria, Prevention of Bullying and Violence at Work, Guidance Note, February 2003, in this document.

OCPE also wishes to acknowledge and thank the Public Sector Consultative Council Working Party on Bullying and others who contributed to the development of this framework

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INTRODUCTION

The Northern Territory Government recognises that bullying and workplace harassment occurs in the Northern Territory Public Sector (NTPS) and is committed to addressing the problem by implementing anti-bullying strategies and policies.

Workplace bullying can affect employees and organisations in a number of ways. These effects can range from actual psychological and physical injuries to reduction in employee productivity due to low morale.

Agency CEOs, managers and supervisors have a legal responsibility to do as much as is practicable to eliminate or reduce the risks to employees' health and safety. Employees also have a legal responsibility about how they behave towards others in the workplace.

The NTPS is committed to promoting courtesy, trust and respect in a working environment that is free from bullying. The NTPS takes a whole-of-business approach by being proactive and integrating its anti-bullying policy into other workplace strategies, including:

- Workplace health and safety
- Employee induction
- Recruitment and selection processes
- Equity and Diversity
- Job redesign
- Performance management
- Provision of goods and services to clients

Employees are entitled to be treated with dignity and respect by their colleagues, superiors and clients. The NTPS does not accept workplace bullying and will not tolerate such behaviour under any circumstance. Demonstrated commitment by management is essential if workplace bullying is to be diminished in the NTPS.

1. WHAT IS WORKPLACE BULLYING?

Bullying can occur whenever people work together. Under certain conditions, most people are capable of bullying. Bullying is not always intentional, sometimes people do not realise that their behaviour can be harmful to others.

Defining Workplace Bullying

Workplace bullying is the less-favourable treatment of an employee by one or more employees, which harms, intimidates, threatens, victimises, undermines, offends, degrades, ridicules, insults or humiliates an employee or employees, whether in front of co-workers, clients, visitors, customers or alone.

Workplace bullying is a form of harassment. It constitutes repeated, unreasonable behaviour directed towards an employee or employees in the course of employment. One-off incidents are also unacceptable. Unless addressed, they can develop into a pattern of repeated bullying.

Workplace bullying is unreasonable and inappropriate workplace activity that may create risk to health and safety. Bullying behaviour undermines an individual's right to respect and dignity at work.

Workplace bullying can be direct or indirect, verbal, physical or otherwise. It can occur within the workplace, among managers, supervisors and workers; or between employees; but it also takes place externally, between workers, staff, clients, suppliers and the general public.

Bullying behaviour may include, but is not limited to:

- Intimidation
- Isolating a person from others
- Withholding information that someone needs to perform effectively
- Shouting/ teasing/ sarcasm
- Spreading malicious gossip
- Sabotaging someone's work
- Taking credit for someone's work
- Threats of violence or physical abuse
- Assigning meaningless tasks unrelated to the job
- Inappropriate comments about personal appearance
- Unrealistic, embarrassing or degrading work demands
- Constant criticisms
- Sending abusive / rude electronic messages (e.g. sms text messages, email)
- Racist, sexist, religious or impairment denigration
- Initiation practices

Bullying does not include:

- Occasional differences of opinion and non-aggressive conflicts and problems in working relations
- Workplace counselling, managing poor performance and other actions in accordance with the *Public Sector Employment and Management Act*.

Effects of Workplace Bullying

Individuals who are being bullied can become stressed, anxious, depressed, physically ill, sleep deprived, withdrawn, aggressive or vengeful. These symptoms may be reflected through:

- Absenteeism
- Reduced efficiency and productivity
- Reduction of service delivery to clients
- Low morale
- Loss of self-esteem and self confidence
- Significant social and health costs for individual employees

The detrimental effects of workplace bullying are seldom limited to just the target employee, and can spread within the work unit or even further and may lead to:

- Erosion of employee loyalty and commitment
- An unsafe work environment
- Possible workers compensation issues
- Loss of skilled, experienced employees through resignation
- Legal risks and costs for the department
- Increased recruitment and training costs
- Gaining a reputation as having a difficult or unpleasant workplace culture

2. PREVENTING WORKPLACE BULLYING

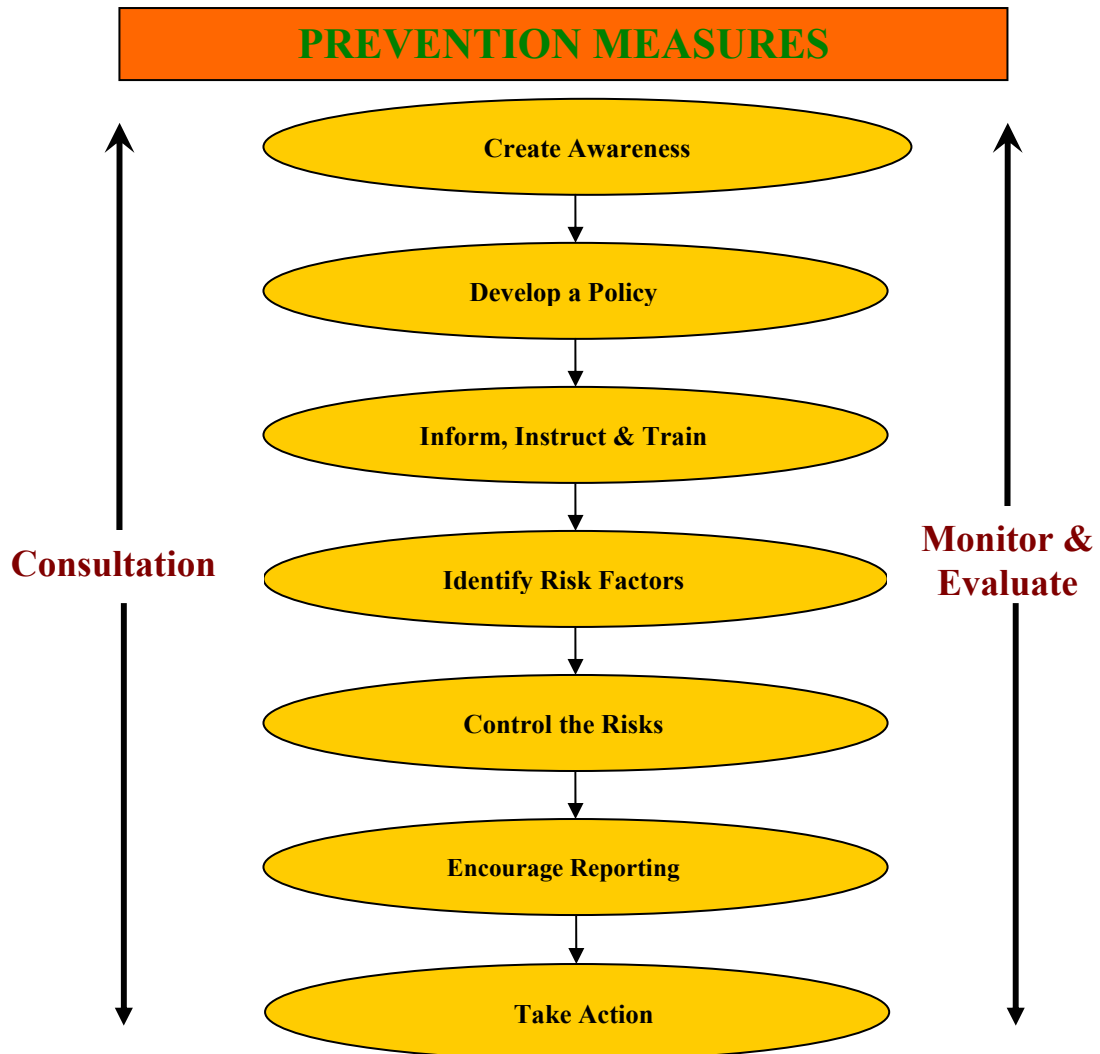
The prevention approach used in this framework is based on the premise that bullying can occur in any workplace, given certain circumstances. While an agency/area may appear free from bullying, it may still be happening. Bullying behaviour can be difficult to detect. Incidents of bullying may not always be reported because employees might:

- Fear retribution or “payback” from the bully
- Believe that no-one will act on the problem
- Fear being labelled “weak” or “whinging”
- Think that reporting will affect their career prospects
- Accept bullying as a normal part of work culture
- Fear being the next target
- Feel shame or guilt they have done something to encourage the behaviour

It is easier to prevent workplace bullying than it is to intervene after an event or mediate to break an established pattern of bullying.

As bullying can occur wherever people work together, this framework recommends that agencies implement a range of complementary prevention measures.

The recommended prevention measures in the model illustrated below are designed to reduce the likelihood of bullying occurring in the workplace.



Because any one measure by itself will not adequately reduce the risk of bullying, it is important that these measures are used in conjunction with each other.

3. CONSULTATION

Consultation with employees will help agencies to:

- Determine the best way of communicating the prevention message
- Successfully implement prevention measures

There are a number of ways in which agencies can consult in the workplace including direct discussion, staff meetings, health and safety committee meetings and special working groups.

Consultation should include the development of:

- Strategies for raising awareness
- A 'no bullying' policy
- Procedures for reporting incidents
- Bullying resolution procedures

4. CREATE AWARENESS

An important step in creating a workplace free of bullying is to create awareness of the issue among all employees, including managers and supervisors.

Awareness-raising should include information about:

- How to recognise bullying
- The possible effects of bullying
- Where to get further information and support
- Internal and external processes available for dealing with alleged bullying

Channels of communication may include formal training sessions, staff newsletters/bulletins, intranet, staff meetings and informal discussion groups.

By raising awareness:

- Agencies and employees will be in a better position to identify and deal with workplace bullying, or circumstances in which bullying could occur
- It will be made clear to everyone that bullying is unacceptable and that incidents of such behaviour should be reported

In particular, information should be provided when:

- Recruiting employees (including appointing or promoting managers and supervisors)
- Running induction programs
- Engaging contractors or supplying services to others

Involving health and safety representatives, union representatives and employees in the development of agency policies will also play an important role in raising awareness.

5. DEVELOP A POLICY

A “no bullying” policy outlines agency standards of acceptable / unacceptable workplace behaviour and makes a clear statement that bullying will not be tolerated. The policy can be developed on its own, or it may be included in relevant existing OHS and other policies.

The policy should be:

- Written in plain English (with consideration to those with English as a second language)
- Displayed where all employees can have access to the policy
- Communicated to employees and reinforced at relevant times eg induction
- Reviewed and updated regularly
- Supported by management

Building commitment to the policy

Agencies can increase commitment to the policy by:

- Developing a policy that is specific to the agency
- Consulting employees on the development of the policy and providing opportunity to comment on a draft policy
- Securing the commitment of the Chief Executive Officer to the policy and involving staff in the policy development
- Ensuring the policy is consistent with existing policies and procedures such as a review of treatment in employment (PSEMA Section 59) and that it is consistently applied and adhered to
- Treating bullying incidents seriously and management role modelling appropriate and professional behaviour.

6. INFORM AND TRAIN

Agencies have a duty of care to provide their employees with the information, training and supervision they need to do their jobs safely, without risks to health and free from bullying and harassment.

Bullying has been linked to situations of role conflict and uncertainty. Agencies should ensure that managers and employees understand their roles and responsibilities and have the appropriate skills to do their job. Employees who are involved in handling reports of bullying will need specific training to assist them to carry out this task.

The specific mix of information, instruction and training needed to reduce the risk of bullying in a particular workplace will depend on the specific needs of the employees and the workplace.

Topics to cover via information and training include:

- Full details of the 'no bullying' policy
- How to comply with the policy
- Measures used in the workplace to prevent bullying
- How to make a report
- Internal and external options for dealing with incidents of bullying

7. IDENTIFY RISK FACTORS

Workplace bullying is often subtle or hidden. Individuals that have no personal experience of bullying may find it difficult to identify. Agencies should not assume that the workplace is free of bullying simply because there are no immediate or obvious signs. There are a number of risk factors that can increase the likelihood of bullying occurring in a workplace. These factors may reveal themselves directly or indirectly.

Bullying risk factors can be revealed directly through:

- Reports from health and safety representatives
- Workplace audits
- Agency climate/ employee opinion surveys
- Exit interviews
- Requests for a review of treatment in employment under section 59 of the *Public Sector Employment Management Act*.

Indirect signs of bullying may include:

- Employees leaving the agency reporting dissatisfaction with working relationships (eg. at exit interviews)
- High levels of absenteeism associated with particular shifts
- An increase in workplace grievances or complaints
- Negative results from employee surveys
- High levels of staff turnover
- Issues raised at staff meetings
- Deterioration of relationships between colleagues, clients or management
- Employees becoming withdrawn and isolated
- Poor work performance
- Increased workers' compensation claims.

Additional Factors

a) Organisational Change

Research has identified that significant organisational change, such as major internal restructuring or technological change, may inadvertently create an environment that increases the risk of bullying¹. This risk can be reduced by appropriate communication and involvement of employees in the change and the provision of training if required.

b) Workforce characteristics

Agencies should be aware that some employees can be more at risk of workplace bullying. These employees may represent a minority in the workplace due to factors such as: age, gender, ethnicity, disability, parental status, religion or political views. They may also be new employees, apprentices, trainees, contractors or casuals.

c) Workplace relationships

Unsatisfactory workplace relationships and poor workplace communication, such as inadequate information flow or lack of consultation with employees, may create an environment in which workplace bullying is more likely to occur. Workplaces that tolerate teasing and practical jokes against employees, or tolerate initiation practices for new employees, are more likely to experience workplace bullying. These types of behaviours may also be unlawful harassment.

d) Work systems

Work system factors that may increase the risk of workplace bullying include:

- Lack of appropriate policies and procedures
- A high rate and intensity of work
- Staff shortages
- Lack of experience and skill in dealing with employee groups
- Poorly defined jobs and high levels of uncertainty about job requirements
- The use of ineffective procedures and/or untrained staff to handle complaints of bullying.

8. CONTROL THE RISK

If risks factors have been identified, agencies need to take action to eliminate or reduce the likelihood of bullying occurring in their organisation. Preventative measures need to target the source of risk, and may involve an organisation-wide response as well as addressing symptoms in a specific area. Where multiple risks factors are identified, there is a greater likelihood that a section or organisation-wide response is required. A combination of measures may need to be used.

¹ Taskforce on the Prevention of Workplace Bullying [2001], *Dignity at Work – The Challenge of Workplace Bullying*, The Stationery Office, Dublin and Hoel & Cooper, [2000], *Destructive Conflict at Work*, Manchester School of Management, Manchester. This observation was also drawn by the Queensland Workplace Bullying Taskforce.

Action may include:

- Providing appropriate training, particularly to those with supervisory responsibilities
- Consulting employees and health and safety representatives prior to and during organisational change
- Redesigning and clearly defining jobs
- Utilising existing conflict management processes (eg internal and/or s59 Review)
- Reducing excessive working hours
- Reviewing resource availability
- Reviewing staffing levels
- Ensuring staff are aware of confidential counselling services available to all NTPS employees.

Where employees have been identified as being at a higher risk of bullying, such as trainees, apprentices and employees from non-English speaking backgrounds, agencies may want to consider additional measures, such as:

- A 'buddy' system for new employees
- Workplace relationships mentoring
- Additional workplace training (eg diversity)
- Specific training for supervisors / managers who are dealing with employees at a higher risk
- Specific training for the employee to ensure they know what their rights and responsibilities are.

9. ENCOURAGE REPORTING

Agencies should encourage the reporting of all incidents of bullying.

Encouraging reporting can assist the employer to:

- Develop an accurate picture of the nature and extent of bullying
- Take action to address the issues being reported
- Assess whether prevention measures are working
- Nip emerging issues 'in the bud'
- Provide prompt assistance and support to employees.

Developing reporting procedures

Procedures should be developed to suit the size and structure of the agency. The procedure should be flexible enough to accommodate the various ways of dealing with a report of bullying, such as informal discussions or formal investigations. Any procedure should ensure confidentiality and fair treatment for those involved including ensuring that there is no victimisation of the employees involved.

Reporting procedures should include options of reporting to, or seeking assistance from, the Agency's Employee Assistance Provider, relevant unions/staff associations, or the Office of the Commissioner for Public Employment's Section 59 Review process.

10. RESPONDING TO INCIDENTS / REPORTS

An agency may find out about bullying in a number of ways, such as:

- Verbal reports
- Written reports
- Hearing verbal abuse or offensive language
- Directly observing bullying type behaviour.

Resolution process

Due to the sensitivity of many bullying incidents, allegations must be treated seriously and investigated promptly. Agencies are to resolve issues quickly, in a confidential manner and as informally as possible in order to minimise conflict and stress for the individuals involved.

Each situation that is reported or observed will usually be different. Therefore, to ensure a consistent approach, it is important to have an agreed procedure in the workplace for dealing with reports.

Agencies are encouraged to incorporate workplace bullying resolution procedures into existing procedures for issues such as review of treatment in employment (grievances) and discipline.

Once a report has been made, there are a number of key principles that should guide the agencies response. These principles are listed in the following table.

KEY PRINCIPLES	
Treat all matters seriously	Treating all reports seriously encourages reporting and shows employees the organisation's commitment to its no bullying policy.
Act Promptly	Prompt intervention can assist in resolving reports as quickly and as fairly as possible.
Non – victimisation of person who reports	It is important to ensure that anyone who raises an issue of bullying is not victimised for coming forward.
Support for both parties	Once a complaint has been made, the person or persons involved should be told of the support systems available to them. These can include employee assistance programs and peer-support systems. The person or people against whom the allegations have been made should also be informed of opportunities for support. In addition, all employees involved should be allowed to have a support person present at interviews or meetings (eg: health and safety representative, union representative or friend)
Neutrality	The person in charge of an investigation or resolution should never have been directly involved in the incident they are investigating or attempting to resolve. Impartiality towards all parties involved is critical. Everyone involved should have confidence in the person who is undertaking the resolution process.
Communication of process	All parties need to be informed of the resolution process, how long it will take and what they can expect will happen during and at the end of the process.

Confidentiality	Those involved need to maintain confidentiality. This is important in case the matter is not proven and to prevent the matter from escalating.
Documentation	Documentation is important to any formal investigation or resolution action. Even if the matter is not formally investigated, a record should be made of all meetings and interviews detailing who was present and the agreed outcome(s).
Natural Justice	The principles of natural justice should be followed in all formal investigations. These principles are designed to protect all parties involved (refer Employment Instruction No 3).

After resolution

After a situation has been resolved, the agency should also examine the work situation to identify and address any underlying risk factors that may have contributed to the bullying occurring.

11. MONITOR & EVALUATE

A key to the success of this strategy will be ongoing monitoring of progress. Reporting guidelines and a reporting structure will be developed as part of the implementation of the strategy to assist NTPS agencies to meet reporting requirements.

Where workplace bullying is perceived to have been eliminated, regular reviews of the strategy should still be performed to ensure continued effectiveness and appropriateness.

12. APPENDICES

Appendix A – ‘No Bullying’ Policy Example

Department of X, Y and Z Workplace Bullying Policy

The Department of X,Y and Z is committed to providing all employees with a healthy and safe work environment free from bullying.

Workplace bullying is the less-favourable treatment of an employee by one or more employees, which harms, intimidates, threatens, victimises, undermines, offends, degrades, ridicules, insults or humiliates an employee or employees, whether in front of co-workers, clients, visitors, customers or alone.

Bullying behaviour may include, but is not limited to:

- Intimidation
- Isolating a person from others
- Withholding information that someone needs to perform effectively
- Shouting/ teasing/ sarcasm
- Spreading malicious gossip
- Sabotaging someone’s work
- Taking credit for someone’s work
- Threats of violence or physical abuse
- Assigning meaningless tasks unrelated to the job
- Inappropriate comments about personal appearance
- Unrealistic, embarrassing or degrading work demands
- Constant criticisms
- Racist, sexist, religious or impairment denigration
- Initiation practices

All employees are expected to behave in a professional manner and to treat each other with dignity and respect when they are at work.

We encourage all employees who experience bullying to report it.

Any report of bullying will be treated seriously and investigated promptly, confidentially and impartially.

Managers and supervisors have a responsibility to ensure employees are not bullied.

The Contact Officer in your area is

Chief Executive Officer
Department of X, Y and Z
Date

Appendix B - Relevant / Associated Legislation

Northern Territory

- The Public Sector Management and Employment Act 1993
 - NTPS Principles and Code of Conduct
 - Employment Instruction Number 7 *Discipline*
 - Employment Instruction Number 8 *Management of Grievances*
 - Employment Instruction Number 10 *Employee Records*
 - Employment Instruction Number 11 *EEO Management Programs*
 - Employment Instruction Number 12 *Occupational Health and Safety Programs*
 - Employment Instruction Number 13 *Code of Conduct*
- The Northern Territory Anti-Discrimination Act 1992
- The Work Health Act 1986

Federal

- The Racial Discrimination Act 1975
- The Human Rights and Equal Opportunity Commission Act (HREOC) 1986
- The Disability Discrimination Act 1992
- The Workplace Relations Act 1996

Summary of Relevant / Associated Legislation and other Information

Anti-harassment and anti-discrimination legislation - Workplace harassment on the basis of a number of attributes including race, sex or disability may be a breach of both the anti-harassment or anti-discrimination provisions of NT and Commonwealth anti-discrimination legislation. Bullying behaviour may also be harassment or discrimination.

NT Anti-Discrimination legislation - The objectives of the NT Anti-discrimination legislation include eliminating discrimination against persons on the ground of race, sex, sexuality, age, marital status, pregnancy, parenthood, breastfeeding, impairment, trade union or employer association, religious belief or activity, political opinion, affiliation or activity, irrelevant medical record or irrelevant criminal record in the area of work, accommodation or education or in the provision of goods, services and facilities, in the activities of clubs or in insurance and superannuation; and to eliminate sexual harassment.

An employer is vicariously liable for an employee or agent who commits a prohibited conduct under the Anti-Discrimination Act unless they can establish that they have taken all reasonable steps to ensure a safe workplace free of prohibited conduct.

Disability discrimination - The *Disability Discrimination Act 1992* outlaws any discrimination or harassment in employment due to disability. A person discriminates against another person on the ground of disability if, because of the aggrieved person's disability, the discriminator treats or proposes to treat the aggrieved person less favourably than the discriminator would treat a person without the disability.

This Act makes harassment in employment unlawful and describes harassment as a form of discrimination. Harassment that is based upon a person's relative or associate having a disability is also unlawful.

Harassment on disability grounds may occur when a person is treated less favourably than others because he/she uses a palliative or therapeutic device or aid, uses a wheelchair or needs a loud speaker telephone, or uses a guide dog, a hearing dog, or other trained animal. Another form of harassment on disability grounds is overbearing or abusive behaviour towards employees with intellectual disabilities, or disparaging remarks about malingering to employees who have made a claim for compensation.

Racial discrimination - While the *Racial Discrimination Act 1975* does not use the term 'racial harassment', that Act defines as unlawful any act involving a distinction, exclusion, restriction or preference based on race, colour, descent or national or ethnic origin of a person which has the purpose of nullifying or impairing the recognition, enjoyment or exercise, on an equal footing, of any human right or fundamental freedom in the political, economic, social, cultural or any other field of public life. Clearly some types of workplace harassment could be seen as unlawful behaviour under the Act.

Sexual discrimination - Workplace sexual harassment includes a wide range of behaviour of a sexual nature, from subtle suggestions about, to explicit demands for, sexual activity or even indecent assault.

Such behaviour includes making a statement of a sexual nature either to the harassed person or in his or her presence. It applies to verbal, non-verbal and written statements. Behaviour that may be acceptable or even welcome in other situations, for example between friends in a social context, may be inappropriate at work.

Sexual harassment may be an isolated incident or a series of incidents. Both men and women can be subjected to sexual harassment from persons of the same or the opposite sex. A person need not actually intend to offend for conduct to amount to sexual harassment.

Human Rights and Equal Opportunity Commission Act - Workplace harassment may constitute discrimination under the *Human Rights and Equal Opportunity Commission Act 1986*. This Act defines discrimination to mean any distinction, exclusion or preference that has the effect of nullifying or impairing equality of opportunity or treatment in employment or occupation made on the basis of race, colour, sex, religion, political opinion, national extraction, social origin, age, medical record, criminal record, impairment, marital status, mental, intellectual or psychiatric disability, nationality, physical disability, sexual preference, or trade union activity.

Workplace relations legislation - The *Workplace Relations Act 1996* aims to help prevent and eliminate discrimination in the making of awards and agreements and in the termination of employment. The Act makes it unlawful to terminate the employment of an employee on certain grounds including race, colour, sex, sexual preference, age, physical or mental disability, marital status, family responsibilities, pregnancy, religion, political opinion, national extraction or social origin.

In addition, the Freedom of Association provisions in section 298A describe one of the objects of Part XA of that Act as to ensure that employers, employees and independent contractors are not discriminated against or victimised because they are, or are not, members or officers of industrial associations.

Industrial law – Where bullying is subject to formal grievance proceedings, then Industrial Commissions can hear evidence in relation to alleged incidents. Bullying can also be an issue in unfair dismissal determinations. Enterprise bargaining agreements now more commonly include provisions on bullying.

Occupational health and safety legislation – The NT *Work Health Act 1986* and the *Occupational Health and Safety (Commonwealth Employment) Act 1991* require employers to take all reasonably practicable steps to protect the health and safety of employees at work. An employer who fails to take reasonably practicable precautions to prevent workplace harassment from occurring, or who fails to deal promptly and effectively with any complaint of harassment, may be in breach of an employer's duty of care to employees.

Workers' compensation – Bullying (and violence) are now commonly identified as issues in workers' compensation claims and appeals for psychological injury due to work-related factors. Where organisations incur an excessive number of claims for bullying and violence, they may incur higher workers' compensation premiums.

Criminal law - There may be instances where harassment amounts to an offence under criminal law. Incidents involving physical or indecent assault, stalking, sending obscene material through the mail and making nuisance phone calls or sending offensive emails, for example, may be offences under criminal law and should be reported to the police.

Criminal Codes – prohibit assault, threats of assault, and possibly stalking and malicious slander (all of which may occur in concert with bullying and other forms of occupational violence). Forthcoming amendments to the Criminal Code will mean that managers will be held responsible for the explicit and implicit culture of a company as acted out individually or systematically manifested.

Common law - an employer is under a duty to protect workers from bullying, and may be liable under negligence provisions, or because of implied terms in employment contracts.

Vicarious Liability - establishes that if an employee or an agent of the employer commits an unlawful act, liability may then attach to the employer, unless the employer can demonstrate that all reasonable steps were taken to prevent the employee or agent committing the act. Lack of awareness is not a defence.

Principles of Natural Justice

- The person who is alleged to have committed the bullying should be treated as innocent unless the allegations are proved to be true
- Any allegation of bullying should be investigated promptly
- All allegations need to be put to the person who is alleged to have committed the bullying
- The person alleged to have committed the bullying must be given a chance to explain his or her version of events
- If the complaint is substantiated, then any disciplinary action that is to be taken needs to be commensurate with the seriousness of the latter (the punishment should fit the crime). Mitigating factors should be taken into account when assessing what form of discipline will be implemented.

13. REFERENCES

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