# Policy
# Bullying and Harassment

## Statement of Intent

This policy:

(a) affirms the CAE's commitment to:
  (i) provide a safe and healthy workplace and learning environment that is free from bullying and unlawful harassment
  (ii) provide staff with information and training in relation to bullying and harassment;
(b) reflects the CAE's values of:
  (i) respect and integrity; and
    1. inclusion and diversity
(c) supports CAE's strategic goal of a culture built on our values.
    2. CAE Australia Flight Training affirms its commitment to a culturally safe, respectful, and inclusive environment for all staff, students, and affiliates. This includes adopting trauma-informed practices and providing additional support for First Nations students, LGBTIQ+ learners, culturally and linguistically diverse (CALD) students, neurodiverse individuals, and others from underrepresented groups. All actions under this policy will be undertaken with sensitivity to cultural backgrounds, lived experiences, and individual needs.

## Application

(a) This policy applies to CAE and any staff member, affiliates or student in relation to CAE related conduct:
(b) between staff members;
(c) between affiliates;
(d) between staff members and affiliates;
(e) by staff or affiliates towards students;
(f) between students;
(g) by students towards staff or affiliates; and
(h) in respect of unlawful discrimination and harassment, by staff and affiliates towards members of the public.

For the avoidance of doubt:

(i) the obligations of staff and affiliates under this policy are in addition to obligations set out in the Code of Conduct for Staff
(j) the obligations of students under this policy are in addition to the obligations set out in the Code of Conduct for Students

## Document Identification

| Document Identification | |
|---|---|
| Policy Number | POL259099 |
| Policy Version | 1.0 |
| Issue Date | 19/01/2026 |
| Document Title | Bullying and Harassment Policy |
| Document Identification | 259099 |

| Related Documents | Document Identification |
|---|---|
| People Management Manual | 116722 |
| Student Management Manual | 86099 |
| Student Discipline Policy | 86101 |
| CAE Complaints & Appeals Policy | 250984 |
| Records Policy | 76225 |

## Introduction

CAE Flight Training Australia is committed to the provision of a fair, healthy and safe learning environment in which everyone is treated with dignity and respect and in which no individual or group feels bullied, threatened or intimidated.

Bullying or harassment in any form is unacceptable behaviour and will not be permitted or condoned.

We recognise that bullying and harassment can exist in the learning spaces, as well as outside, and that this can seriously affect student's working lives by detracting from a productive environment and can impact on the health, confidence, morale and performance of those affected by it, including anyone who witnesses or has knowledge of the unwanted or unacceptable behaviour.

CAE maintains a zero-tolerance approach to bullying, harassment, and discrimination in any form. All substantiated incidents will result in appropriate corrective or disciplinary action, up to and including termination of employment or enrolment.

## Harassment

The intention of this procedure is to inform students of the type of behaviour that is unacceptable and to provide procedural guidance.

We recognise that we have a duty to implement this policy and all students are expected to comply with it.

Harassment is any unwanted physical, verbal or non-verbal conduct based on grounds of age, disability, gender identity, marriage and civil partnership, pregnancy or maternity, race, religion or belief, sex or sexual orientation which affects the dignity of anyone at work or creates an intimidating, hostile, degrading, humiliating or offensive environment.

Sexual harassment is any unwelcome sexual advance, an unwelcome request for sexual favours or any unwelcome conduct of a sexual nature. Such conduct includes making a statement of a sexual nature to a person, or in the presence of a person, whether the statement is made orally or in writing. Harassment on the grounds of sex is any unwelcome conduct of a seriously demeaning nature and includes making a statement to a person, or in the presence of a person, whether the statement is made orally or in writing.

A single incident of unwanted or offensive behaviour can amount to harassment.

Harassment can take many forms and individuals may not always realise that their behaviour constitutes harassment. Examples of harassment include:

- insensitive jokes and pranks including inappropriate comments based on sex
- lewd or abusive comments about appearance and/or asking intrusive personal questions based on a person's sex
- deliberate exclusion from conversations and/or displaying abusive or offensive writing or material
- unwelcome sexual advance, or an unwelcome request for sexual favours
- unwelcome conduct of a sexual nature
- unwelcome touching and
- abusive, threatening or insulting words or behaviour.

These examples are not exhaustive and disciplinary action at the appropriate level will be taken against students committing any form of harassment. Appropriate action in relation to a student will include disciplinary action in accordance with the Student's Disciplinary Policy. Appropriate action may include termination of their enrolment with CAE.

## Bullying

Bullying is repeated, offensive, abusive, intimidating, insulting or unreasonable behaviour directed towards an individual or a group, which makes the recipient(s) feel threatened, humiliated or vulnerable. Note single incidents of bullying will not be tolerated. Bullying can occur in the workplace and outside of the workplace at events connected to the workplace, such as social functions or business trips. Bullying can be a form of harassment and can cause an individual to suffer negative physical and mental effects. Bullying can take the form of physical, verbal and non-verbal conduct. As with harassment, there are many examples of bullying, which can include:

- abusive, insulting or offensive language or comments
- unjustified criticism or complaints
- physical or emotional threats
- deliberate exclusion from activities
- the spreading of misinformation or malicious rumours and
- the denial of access to information or resources such that it has a detrimental impact on the individual or group.
- Setting unreasonable timelines or constantly changing deadlines
- Making threats or comments without foundation
- Excessive scrutiny

The behaviour referred above may:

A. Occur through any form of contact or communication including
B. In person:
    a. By telephone or email
    b. Through another person or
C. Be directed at a single person or group of people and be carried out by one or more person
D. Occur from managers to workers, between workers or students, or from workers or students to managers.

For the purpose of this policy, bullying also includes stalking, which means:

A. following, watching or contacting a person without their consent, including by phone, text, email or social media
B. with the intention of annoying, intimidating or causing them to fear physical or mental harm

**Note**: Stalking or intimidating another person with the intention of causing them to fear physical or mental harm is a criminal offence.

These examples are not exhaustive and disciplinary action at the appropriate level will be taken against students committing any form of bullying. Appropriate action in relation to an student will include disciplinary action in accordance with the Disciplinary Policy. Action may include termination of their enrolment with CAE.

## Cyberbullying and Online Conduct

Bullying, harassment, or discrimination conducted through digital platforms — including email, learning management systems, instant messaging, social media, or other online communication tools — is strictly prohibited. This includes offensive or threatening posts, comments, images, or messages; deliberate exclusion from online group activities; the sharing of personal information without consent; or any conduct that breaches CAE's digital use guidelines. These behaviours are subject to the same disciplinary and remedial actions outlined in this policy.

## Reasonable management action taken in a reasonable way

It is reasonable for Instructors and Examiners to allocate work and to give fair and reasonable feedback on a student's performance. These actions are not considered to be bullying or harassment if they are carried out lawfully and in a reasonable manner, taking the particular circumstances into account. setting reasonable performance goals, standards and deadlines

## Bullying and harassment complaint procedures

### Informal complaint

We recognise that complaints of bullying, harassment, and particularly of sexual harassment, can sometimes be of a sensitive or intimate nature and that it may not be appropriate for you to raise the issue through our normal grievance procedure. In these circumstances you are encouraged to raise such issues with a senior staff member of your choice (whether or not that person has a direct supervisory responsibility for you) as a confidential helper.

If you are the victim of minor bullying or harassment you should make it clear to the alleged bully or harasser on an informal basis that their behaviour is unwelcome and ask the individual to stop. If you feel unable to do this verbally then you should hand a written request to the individual, and your confidential helper can assist you in this.

### Formal complaint

Where the informal approach fails or if the bullying or harassment is more serious, you should bring the matter to the attention of management as a formal written complaint and again your confidential helper can assist you in this. If possible, you should keep notes of the bullying or harassment so that the written complaint can include:

- the name of the alleged bully or harasser
- the nature of the alleged incident of bullying or harassment
- the dates and times when the alleged incident of bullying or harassment occurred
- the names of any witnesses and
- any action already taken by you to stop the alleged bullying or harassment.

On receipt of a formal complaint, we will take action to separate you from the alleged bully or harasser to enable an uninterrupted investigation to take place. This may involve a temporary transfer of the alleged bully or harasser to another work area or suspension of employees (with contractual pay) until the matter has been resolved.

The person dealing with the complaint will invite you to attend a meeting, at a reasonable time and location, to discuss the matter and carry out a thorough investigation. You have the right to be accompanied at such a meeting by your confidential helper or another person of your choice and you must take all reasonable steps to attend. Those involved in the investigation will be expected to act in confidence and any breach of confidence will be a disciplinary matter.

Where appropriate, the appointed investigator will issue a report of the findings and decision, in writing, to you and to the alleged bully or harasser.

All formal complaints will be handled in accordance with **CAE's Complaints and Appeals Policy**, and where applicable, students retain the right to seek an independent review of outcomes. Complainants will also be provided with information about available support services, including counselling, advocacy, and cultural liaison services.

## General notes

If the report concludes that the allegation is well founded, appropriate action will be taken against the bully or harasser. If you bring a complaint of bullying or harassment you will not be victimised for having brought the complaint. However, if the report concludes that the complaint is both untrue and has been brought with malicious intent, appropriate action will be taken against you. Appropriate action in relation to a student will include disciplinary action in accordance with the Disciplinary Policy. Action may include termination of their enrolment with CAE.

## Application of other laws and policies

Incidents of physical abuse or assault may also be illegal under criminal law. They should be reported to the police.

Conduct constituting bullying, and a person's response to allegations of bullying, may also breach work, health and safety legislation.

Where bullying, discrimination or harassment leads to a diagnosed injury or ill health, this may give rise to an entitlement under workers' compensation legislation.

## Record Keeping

All complaints, investigation notes, and related documentation will be securely stored in accordance with CAE's Records Management Policy. Access will be limited to authorised personnel, and records will be retained for the legally required period to ensure transparency, accountability, and compliance.

This policy will be reviewed as required, to ensure that the terms are current, fair and representative of relevant corporate and industry conditions.

## Entitlements and responsibilities

All workers, affiliates and students have:

(a) an entitlement to work or study in a safe and healthy environment free of bullying, harassment and discrimination;

3. an entitlement to make a complaint about any bullying or harassing behaviour they are subjected to, or witness, in accordance with:

(i) for workers: the Bullying, Harassment and Discrimination Resolution Procedures 2019

4. for students: the Students the Complaints and Appeals Policy

(b) a responsibility not knowingly to misuse this policy, including making a vexatious or malicious accusation of bullying, harassment or discrimination

(c) a responsibility to ensure they do not promote or engage in bullying, harassment or discrimination

(d) a responsibility to comply with any reasonable instruction given by CAE regarding the prevention of bullying, discrimination and harassment including complying with this policy

(e) a responsibility not to victimise any person who raises a complaint of bullying, harassment or discrimination in accordance with the Bullying

(f) monitoring, and where appropriate addressing in accordance with CAE policies and procedure

(g) hazard and incident reports

## Training, Prevention and Awareness

CAE recognises that prevention is key to maintaining a safe and respectful environment. In addition to reactive measures, CAE will implement proactive strategies, including:

Annual mandatory training for all staff, students, and affiliates on bullying, harassment, cultural safety, and respectful communication;

Awareness campaigns and resources highlighting acceptable behaviours and complaint options;

Regular review of learning and working environments to identify and mitigate risks.

Targeted training for managers and complaint handlers in culturally competent, trauma-informed practice.

## Breach of policy

Breach of this policy may have the following consequences.

(a) For workers: disciplinary action, up to and including termination of employment or engagement.
(b) For students: breach of this policy may constitute misconduct for the purposes of the Student Discipline Policy.

Other actions that may result from a breach of this policy include, but are not limited to:

(a) the complainant receiving an oral or written apology from the respondent with a commitment to cease the bullying behaviour;
(b) the parties being required to participate in some form of counselling, mediation or conciliation;
(c) the respondent undertaking training in relation to their behaviour; and
(d) drawing up a management plan to document agreed or proposed actions by the parties.

## Document Control

Amendments made to this document since the previous version, are listed below. All amendments to this document have been made in accordance with CAE document management procedure.

| Version No. | Issue Date | Amendment Description |
|---|---|---|
| 1.0 | 19/01/2026 | Initial Issue |
| | | |
| | | |
| | | |
| | | |

Hard copies of this manual are uncontrolled, and users of this manual should always refer to the document published on CAE's document management system to ensure that the current document is being referenced.