PENINSULA CITY CHURCH

Policy Title: Bullying Policy
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Approved By: Peninsula City Church Board
Responsible Officer: Board Chair
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Related Documents:

- Complaints Policy, Sexual Harassment Policy, WHS Policy, Social Media Policy, Privacy Policy

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1. Purpose

Peninsula City Church believes that all people should work in an environment free from bullying.

Peninsula City Church understands that workplace bullying is a threat to the health and wellbeing of its staff, volunteers and congregation.

Accordingly, Peninsula City Church is committed to eliminating, so far as is reasonably practicable, all forms of workplace bullying by maintaining a culture of openness, support, and accountability.

The purpose of this document is to communicate that Peninsula City Church does not tolerate any form of workplace bullying and to set out the process which is to be followed should any instances of workplace bullying be reported.

2. Scope

Applies to all Peninsula City Church staff, volunteers, contractors, and ministry participants across physical and digital spaces.

3. Definitions

"Bullying" is repeated and unreasonable behaviour directed towards a person or group of persons that creates a risk to health and safety. It includes behaviour that could be expected to intimidate, offend, degrade, humiliate, undermine or threaten. This includes sexual harassment, which may not require repeated behaviour to be actionable under the Fair Work Act 2009, and cyberbullying conducted through digital platforms.

"Repeated behaviour" refers to the persistent nature of the behaviour and can involve a range of behaviours over time.

"Unreasonable behaviour" is behaviour that a reasonable person, having considered the circumstances would see as unreasonable, including behaviour that is victimising, humiliating, intimidating or threatening.

Examples of behaviour, whether intentional or unintentional, that may be considered workplace bullying if they are repeated, unreasonable and create a risk to health and safety, include but are not limited to:

- abusive, insulting or offensive language or comments
- unjustified criticism or complaints
- deliberately excluding someone from workplace activities
- withholding information that is vital for effective work performance
- setting unreasonable timelines or constantly changing deadlines
- setting tasks that are unreasonably below or beyond a person's skill level
- denying access to information, supervision, consultation or resources to the detriment of the worker
- spreading misinformation or malicious rumours
- changing work arrangements such as rosters and leave to deliberately inconvenience a particular workers or workers
- Sexual harassment, such as inappropriate comments, advances, or actions during pastoral interactions or church events
- Misuse of pastoral or leadership authority to shame, intimidate, or manipulate
- Cyberbullying, such as harassment via church-managed social media groups, WhatsApp etc, or public shaming online

Workplace bullying can be carried out in a variety of ways including through email, text or social media channels. It can also occur in non-workplace settings, such as off-site church events, volunteer activities, or online platforms managed by the church.

Workplace bullying can occur between workers (sideways), from managers to workers (downwards), or workers to supervisors/managers (upwards).

Reasonable management action is not considered to be workplace bullying if it is carried out lawfully and in a reasonable manner in the circumstances. Examples of reasonable management action include but are not limited to:

- setting reasonable performance goals, standards and deadlines
- deciding not to select a worker for promotion where a reasonable process is followed
- informing a worker about unsatisfactory work performance in an honest, fair and constructive way
- taking disciplinary action, including suspension or terminating employment.

Differences of opinion and disagreements are generally not considered to be workplace bullying.

Bullying that directly inflicts physical pain, harm, or humiliation that amounts to assault, should be dealt with as a police matter (see below).

4. Policy Statement

Peninsula City Church has a duty of care to provide a safe workplace, and ensure, so far as is reasonably practicable, that workers and other people are not exposed to health and safety risks, including psychosocial hazards such as bullying under the Occupational Health and Safety Act 2004 (Vic).

Peninsula City Church accepts and acts on its duty of care. Any reported allegations of workplace bullying will be promptly, thoroughly, and fairly investigated.

Bullying complaints will be handled in a confidential and procedurally fair manner. Where confidentiality cannot be guaranteed this will be clearly communicated to the relevant parties. All parties, including complainants and the accused, will be offered support, such as access to pastoral care and counselling, to ensure their wellbeing during the process.

All parties will be treated with respect.

The person against whom the allegation is made has the right to natural justice (the right to know what is alleged against them, the right to put their case in reply, and the right for any decision to be made by an impartial decision-maker). Peninsula City Church complies with Australia's Whistleblower Protection Laws under the Corporations Act 2001 ensuring protections against retaliation for those reporting bullying in good faith.

5. Responsibilities

Role	Responsibility
Board	Oversight and annual review
Lead Pastor	Implementation and escalation
Staff/Ministry Leaders	Early intervention and culture setting
All Personnel	Compliance and reporting

6. Prevention And Training

Peninsula City Church is committed to preventing bullying through proactive measures, including:

- Periodic training on bullying awareness, respectful workplace behaviour, and safe digital communication for all Elders, Board Members, staff and volunteers during induction and annually thereafter. Training should include examples specific to the church context, such as appropriate pastoral authority and volunteer interactions.
- Encouraging bystander intervention by training staff and volunteers to safely report observed bullying and fostering a culture of accountability.

7. Reporting Mechanisms

Any Elder, Board Member, staff member, volunteer, contractor, or community member who experiences or observes bullying must report it immediately. Refer to existing Peninsula City Church Bullying Procedures.

Reports can be made to:

- The immediate supervisor, unless they are the alleged perpetrator
- The Lead Pastor, unless they are implicated
- Anonymously through a confidential email or the existing Complaints Form.
- If the alleged perpetrator is a senior leader (e.g. Lead Pastor or Board member), reports can be escalated to the Board Chair or an external mediator approved by the Board or Eldership if it pertains to a Board Member.

Ministry Leaders receiving reports must escalate them to the Lead Pastor or Board Chair within 24 hours. Reports of cyberbullying may also be escalated to the eSafety Commissioner (www.esafety.gov.au) if they involve online harassment that is deemed serious online abuse. Reports of bullying involving physical assault must be reported to Victoria Police by the Lead Pastor or Board Chair.

Bystanders are encouraged to report observed bullying safely.

8. Investigation Process

Upon receiving a bullying complaint, the Lead Pastor, or Board Chair will:

- Conduct an initial review within 2 working days to assess the allegation's credibility and determine further action.
- If work related, direct complaint investigation to our Operations Pastor.
- If church volunteer related direct complaint investigation to our Associate Pastor.
- If Peninsula Christian Care volunteer, direct complaint investigation to our Community Pastor.
- If warranted, coordinate a formal investigation within 7 working days, involving an impartial internal or external investigator (e.g. a mediator or legal advisor) to avoid conflicts of interest, particularly if senior leaders are implicated.
- Ensure all parties are informed of the process, allegations, and their rights to natural justice, with regular updates provided.
- Complete investigations within 14 working days, unless complex, with extensions communicated to all parties.

Maintain a secure incident register to document complaints, investigations, and outcomes, with records retained for 7 years in compliance with ACNC and Privacy Act requirements.

9. Monitoring & Review

- The Board will monitor the policy's effectiveness through:
- Annual reports on bullying complaints and resolution rates presented at Board meetings
- Lead Pastor, or delegate, to track training compliance and maintain the Incident Register.
- Feedback from staff, volunteers, and community members on workplace culture

The policy will be reviewed every two years or sooner if significant incidents or legislative changes occur (e.g., updates to the Fair Work Act or Occupational Health and Safety Act). Feedback from staff, volunteers, and/or external audits will inform any future updates.