

WORK HEALTH AND SAFETY, BULLYING, HARASSMENT AND ABUSE POLICY AND PROCEDURES

Provider	The Bright College RTO 45752 CRICOS 03945D
Campus	Level 2, 440 William Street, Perth WA 6000
Policy version	3.1
Regulatory review	15 September 2026
Applies to	All applicable domestic and international students
Policy owner	CEO / Academic Manager
Next review	15 September 2027

Regulatory framework

- National Vocational Education and Training Regulator Act 2011 (Cth).
- National Vocational Education and Training Regulator (Outcome Standards for Registered Training Organisations) Instrument 2025 (effective for RTOs from 1 July 2025).
- Work Health and Safety Act 2020 (WA).
- Work Health and Safety (General) Regulations 2022 (WA) (current consolidation from 1 July 2026).

1. Purpose

The Bright College is committed to providing and maintaining a safe, healthy, respectful and inclusive environment for all students, staff, contractors, trainers and other persons who interact with the College.

The purpose of this Policy is to establish a clear framework for:

- protecting the physical and psychological health and safety of students and workers;
- identifying and managing work health and safety risks;
- preventing bullying, harassment, abuse, discrimination, sexual harassment, violence, aggression and other inappropriate behavior;
- protecting students from abuse, bullying, harassment and unsafe behavior;
- protecting staff and workers from workplace bullying, harassment, abuse, sexual harassment and violence;
- providing safe and accessible mechanisms for reporting concerns and making complaints;
- ensuring complaints and incidents are handled fairly, promptly, confidentially and appropriately;
- ensuring appropriate intervention, investigation and corrective action; and
- complying with applicable work health and safety, employment, anti-discrimination, education and vocational education and training requirements.

2. SCOPE

This Policy applies to all persons involved with The Bright College, including:

Students

- domestic students;
- international students;
- ELICOS students;
- apprentices, trainees and work-placement students;
- students undertaking practical training;
- students participating in College events, activities or excursions.

Workers and other persons

- employees;
- casual employees;
- trainers and assessors;
- academic and administrative staff;
- managers and supervisors;
- contractors and independent contractors;
- consultants;
- volunteers;
- education agents when acting on behalf of or representing the College;
- work placement personnel and supervisors;
- visitors and guests; and
- other persons interacting with the College.

The Policy applies to conduct occurring:

- on College premises;
- during classes and practical training;
- during work placement;
- during College events and activities;
- during excursions or off-campus activities;
- during meetings;
- through telephone calls, email, Teams, Zoom, WhatsApp or other communication systems;
- through Moodle, aXcelerate, PowerPro or other College systems;
- through social media where conduct has a connection to the College; and
- in any other circumstance where the conduct is connected to the College, its staff, students or activities.

3. POLICY STATEMENT

The Bright College has **zero tolerance for bullying, harassment, abuse, sexual harassment, discrimination, violence, threats, intimidation, victimization or other unlawful or inappropriate conduct.**

Everyone has the right to:

- be treated with dignity and respect;
- study and work in a safe environment;
- be free from bullying and harassment;
- be free from abuse and violence;
- raise concerns without fear of retaliation;
- have complaints taken seriously;
- have complaints handled fairly and confidentially; and
- receive appropriate support.

The College will take reasonable and proportionate steps to prevent, identify and respond to health and safety risks, including psychosocial hazards.

4. WORK HEALTH AND SAFETY RESPONSIBILITIES

4.1 The Bright College / PCBU

The College, as the relevant person conducting a business or undertaking (PCBU), will:

- provide and maintain a safe working and learning environment;
- identify hazards and assess WHS risks;
- eliminate risks where reasonably practicable;
- minimize risks where elimination is not reasonably practicable;
- manage physical and psychosocial hazards;
- provide appropriate information, instruction, training and supervision;
- maintain appropriate emergency procedures;
- provide appropriate facilities and equipment;
- consult with workers as required;
- monitor incidents, hazards and complaints;
- investigate reported safety concerns;
- implement corrective and preventative actions;
- maintain appropriate records; and
- regularly review WHS controls and this Policy.

5. MANAGEMENT RESPONSIBILITIES

Managers and supervisors are expected to:

- lead by example;
- promote respectful behavior;
- monitor workplace and learning environments for safety risks;

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- respond promptly to reported concerns;
- take reasonable action to prevent bullying, harassment and abuse;
- ensure workers and students know how to report concerns;
- maintain appropriate confidentiality;
- ensure complaints are not ignored or dismissed;
- escalate serious matters immediately;
- document incidents and actions taken;
- implement reasonable risk controls; and
- Ensure that no person is victimized for making a genuine complaint.

6. STAFF, TRAINER AND CONTRACTOR RESPONSIBILITIES

All workers, including contractors and trainers, must:

- take reasonable care of their own health and safety;
- take reasonable care that their conduct does not adversely affect others;
- follow reasonable WHS instructions;
- comply with College policies and procedures;
- treat students and colleagues respectfully;
- report hazards, incidents and unsafe behavior;
- cooperate with investigations;
- maintain professional boundaries with students;
- maintain confidentiality;
- not engage in bullying, harassment, abuse or discrimination; and
- not retaliate against a person who raises a genuine concern.

7. STUDENT RESPONSIBILITIES

Students are expected to:

- behave respectfully towards other students and staff;
- follow reasonable College safety instructions;
- comply with classroom, practical and work-placement safety requirements;
- report hazards and incidents;
- report bullying, harassment, abuse or threatening behavior;
- cooperate with reasonable investigations;
- respect personal boundaries;
- use College communication systems appropriately; and
- not engage in threatening, abusive, discriminatory, bullying or harassing conduct.

8. BULLYING

For workplace purposes, bullying generally involves repeated unreasonable behavior towards a worker or group of workers that creates a risk to health and safety.

Examples may include:

- repeated verbal abuse;
- aggressive or intimidating behavior;
- humiliating or degrading another person;
- repeated unreasonable criticism;
- deliberately excluding someone from work-related activities;
- spreading malicious rumors;
- threatening behavior;
- unreasonable work demands;
- deliberately undermining someone's work;
- repeated inappropriate messages;
- cyberbullying; and
- other repeated unreasonable conduct creating a health and safety risk.

For students, bullying may include:

- repeated intimidation;
- insults or humiliation;
- threatening another student;
- deliberately excluding a student;
- spreading rumors;
- repeated online harassment;
- abusive messages;
- targeted social-media abuse;
- deliberately interfering with another student's learning; or
- repeated unreasonable conduct causing psychological or physical harm.

9. WHAT IS NOT NECESSARILY BULLYING

Reasonable management action undertaken in a reasonable manner is not bullying.

Examples may include:

- reasonable performance management;
- providing constructive feedback;
- allocating work;
- changing work duties;
- addressing attendance or performance concerns;
- applying College policies;
- disciplinary action where justified;
- Managing student conduct;
- academic intervention;

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- assessment feedback;
- course progress intervention; and
- enforcing legitimate College requirements.

However, management or academic action must always be undertaken professionally, fairly and reasonably.

10. HARASSMENT

Harassment is unwanted or inappropriate behavior that may offend, humiliate, intimidate or otherwise adversely affect another person.

Harassment may include:

- verbal comments;
- jokes;
- gestures;
- written communications;
- online conduct;
- unwanted attention;
- offensive images;
- inappropriate comments about a person's characteristics;
- repeated unwanted contact; or
- other inappropriate conduct.

Harassment may occur in person or electronically.

11. SEXUAL HARASSMENT

The Bright College prohibits sexual harassment.

Sexual harassment includes:

- unwelcome sexual advances;
- unwelcome requests for sexual favors;
- unwelcome sexual comments;
- sexual jokes or comments;
- inappropriate touching;
- staring or leering;
- displaying sexually explicit material;
- intrusive questions about someone's body or private life;
- unwanted invitations of a sexual nature; and
- other unwelcome conduct of a sexual nature.

Sexual harassment can occur through:

- face-to-face interactions;
- email;
- messaging;
- social media;
- online classes;
- video conferencing;
- work placement;
- College events; or
- other conduct connected with work or study.

Sexual harassment does not need to be repeated. A single incident may constitute sexual harassment.

12. ABUSE

The Bright College prohibits all forms of abuse.

Abuse may be:

Physical abuse

Including:

- hitting;
- pushing;
- kicking;
- unwanted physical restraint;
- physical assault; or
- other physical harm.

Psychological or emotional abuse

Including:

- threats;
- intimidation;
- humiliation;
- coercion;
- manipulation;
- controlling behavior;
- persistent verbal abuse; or
- conduct causing psychological harm.

Sexual abuse

Including:

- sexual assault;
- sexual exploitation;
- unwanted sexual contact;
- sexual coercion; or
- other unlawful sexual conduct.

Financial or exploitative abuse

Including:

- coercing a person to provide money;
- inappropriate financial exploitation;
- taking advantage of a person's vulnerability; or
- other exploitative conduct.

Any suspected criminal conduct may be referred to the Police or other appropriate authority.

13. VIOLENCE, THREATS AND AGGRESSION

The College does not tolerate:

- physical violence;
- threats of violence;
- intimidation;
- threatening gestures;
- verbal aggression;
- abusive language;
- stalking;
- property damage;
- physical assault;
- sexual assault; or
- other aggressive conduct.

This applies to conduct by:

- staff;
- students;
- visitors;
- contractors;
- work-placement personnel;
- clients;
- customers;
- agents; and
- other persons interacting with the College.

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WorkSafe WA specifically recognizes violence, aggression, verbal abuse, threats, intimidation and harassment as matters requiring appropriate risk management.

14. DISCRIMINATION

The College does not tolerate unlawful discrimination.

No person should be treated unfairly because of characteristics protected by applicable Australian anti-discrimination laws.

Concerns regarding discrimination will be managed under the College's complaints and incident-management processes and, where appropriate, referred to the relevant external authority.

15. PSYCHOSOCIAL HAZARDS

The College recognizes that WHS includes psychological health as well as physical safety.

Psychosocial hazards may arise from:

- bullying;
- harassment;
- violence;
- aggression;
- discrimination;
- excessive workload;
- unreasonable work demands;
- fatigue;
- inadequate support;
- poor workplace relationships;
- conflict;
- traumatic incidents;
- poor organizational processes; and
- other factors associated with the design or management of work.

WorkSafe WA identifies psychosocial hazards as factors arising from work design, management, environment and social interactions that can cause physical or psychological harm.

The College will identify, assess and control psychosocial risks using the same risk-management principles applied to other WHS hazards.

16. STUDENT SAFETY AND WELLBEING

The College will take reasonable steps to provide students with a safe learning environment.

This includes:

- safe classrooms;

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- safe practical training areas;
- appropriate supervision;
- appropriate emergency arrangements;
- clear behavioral expectations;
- mechanisms for reporting concerns;
- student support;
- appropriate intervention;
- protection from bullying and harassment; and
- appropriate referral where additional support is required.

Students undertaking work placement must also comply with the host organization's WHS requirements.

17. WORK PLACEMENT SAFETY

Before or during work placement, the College will take reasonable steps to ensure that:

- placement arrangements are appropriately documented;
- students receive relevant safety information;
- required checks and documentation are completed;
- students understand reporting arrangements;
- placement providers understand relevant College expectations;
- incidents are reported and escalated;
- concerns about bullying, harassment, abuse or unsafe conduct are addressed; and
- placement arrangements are reviewed where a student's health or safety may be at risk.

A student may report a safety concern to the College even where the incident occurred at a third-party placement provider.

18. REPORTING A CONCERN OR COMPLAINT

A student or worker may report:

- bullying;
- harassment;
- abuse;
- sexual harassment;
- discrimination;
- violence;
- threats;
- unsafe work or study conditions;
- psychosocial hazards;
- inappropriate conduct; or
- any other WHS concern.

Reports may be made verbally or in writing.

Where possible, reports should include:

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- name of person reporting;
- date and time;
- location;
- persons involved;
- description of what occurred;
- witnesses;
- supporting documents or messages;
- photographs or other evidence where relevant; and
- immediate safety concerns.

A person does not need to determine whether conduct legally constitutes bullying, harassment or abuse before reporting it.

19. REPORTING CHANNELS

Concerns should normally be reported to:

Primary Contact:

RTO Manager / Management
The Bright College
Level 2, 440 William Street
Perth WA 6000

Email: admin@thebrightcollege.edu.au

Where the concern involves the RTO Manager, the complaint should be escalated directly to the **CEO/Director or Board representative**.

Where a person believes they are in immediate danger, they should contact **000**.

Serious criminal conduct should be reported to the Police.

20. CONFIDENTIALITY

The College will handle reports and investigations as confidentially as reasonably practicable.

Information will only be shared with persons who need the information to:

- assess the concern;
- manage risk;
- investigate the matter;
- provide support;
- implement corrective action;
- meet legal or regulatory obligations; or
- respond to an external authority.

Absolute confidentiality cannot be guaranteed where disclosure is legally required or necessary to protect a person from serious harm.

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21. NO VICTIMISATION OR RETALIATION

The College prohibits retaliation against a person who:

- makes a genuine complaint;
- reports on safety concern;
- assists with an investigation;
- provides evidence;
- participates as a witness; or
- seeks support.

Victimization or retaliation may result in disciplinary or other appropriate action.

False or malicious complaints may also be addressed appropriately; however, a complaint will not be considered false merely because it cannot be substantiated.

22. IMMEDIATE SAFETY RESPONSE

Where there is an immediate safety risk, the College may take urgent action including:

- separating individuals;
- directing a person to leave the premises;
- suspending access to College facilities or systems;
- changing class or work arrangements;
- arranging additional supervision;
- contacting emergency services;
- contacting Police;
- arranging medical assistance;
- contacting a parent/guardian where appropriate and lawful;
- temporarily changing work-placement arrangement; or
- implementing other reasonable controls.

Immediate safety takes priority over completing the investigation.

23. COMPLAINT AND INCIDENT MANAGEMENT PROCEDURE

Step 1 – Receive the report

The receiving staff member must:

- listen respectfully;
- take the concern seriously;
- avoid making promises about the outcome;
- record the information accurately;
- identify immediate safety risks; and
- escalate the matter where required.

Step 2 – Assess immediate risk

Management will determine whether there is:

- immediate physical danger;
- risk of psychological harm;
- risk of ongoing harassment;
- risk of retaliation;
- risk to other students or workers;
- suspected criminal conduct; or
- another urgent WHS concern.

Step 3 – Implement interim controls

Where necessary, the College may implement interim measures while the matter is being assessed.

These measures are not necessarily findings of wrongdoing.

Step 4 – Determine appropriate response

Depending on the nature and seriousness of the matter, the College may:

- resolve the issue informally;
- conduct a formal investigation;
- obtain further information;
- interview relevant persons;
- review documents or electronic communications;
- obtain specialist advice;
- refer to the matter externally; or
- take immediate disciplinary or protective action.

Step 5 – Investigation

Investigations will be conducted fairly and objectively as reasonably practicable.

The investigator should:

- establish the relevant facts;
- provide relevant persons an opportunity to respond;
- consider available evidence;
- maintain confidentiality;
- avoid unnecessary disclosure; and
- document the investigation.

Step 6 – Outcome

Possible outcomes include:

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- no further action;
- informal resolution;
- counselling;
- additional training;
- behavioral direction;
- mediation where appropriate;
- changes to work or study arrangements;
- warning;
- disciplinary action;
- termination of employment or engagement;
- student disciplinary action;
- removal from a work placement;
- referral to Police;
- referral to another government authority; or
- other corrective action.

Step 7 – Follow-up

The College will, where appropriate:

- check that agreed actions have been implemented;
- monitor for retaliation;
- review risk controls;
- provide appropriate support; and
- close the matter formally.

24. SUPPORT FOR PERSONS INVOLVED

The College may provide or facilitate access to appropriate support, including:

- student support services;
- academic support;
- welfare support;
- counselling referral;
- Employee Assistance Program, where available;
- medical assistance;
- emergency services;
- external specialist services; and
- other appropriate community or professional support.

25. RECORD KEEPING

The College will maintain appropriate records of:

- reported incidents;
- complaints;
- risk assessments;
- investigation activities;
- evidence;
- actions taken;
- outcomes;
- corrective actions;
- referrals; and
- follow-up activities.

Records will be maintained securely and accessed only by authorized persons.

26. WHS RISK MANAGEMENT

The College will apply a risk-management process involving:

1. Identify the hazard
2. Assess the risk
3. Determine appropriate controls
4. Implement controls
5. Monitor and review controls

The process applies to both physical and psychosocial hazards.

Risk factors may include:

- likelihood of occurrence;
- potential severity;
- number of people exposed;
- duration of exposure;
- vulnerability of affected persons;
- existing controls; and
- effectiveness of proposed controls.

27. INCIDENT REPORTING

All serious incidents, injuries, threats, violence, abuse, sexual harassment and significant psychosocial incidents must be escalated to Management promptly.

Where legislation requires notification to a regulator or other authority, the College will make the required notification within the applicable timeframe.

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28. EMERGENCY PROCEDURES

All students and workers must follow the College's emergency procedures.

Emergency situations may include:

- fire;
- medical emergency;
- physical assault;
- threatening behavior;
- serious injury;
- dangerous persons;
- evacuation;
- hazardous materials;
- other situations presenting an immediate risk.

Emergency contact:

Police / Fire / Ambulance: 000

29. TRAINING AND AWARENESS

The College will provide appropriate information and training regarding:

- WHS responsibilities;
- emergency procedures;
- bullying;
- harassment;
- sexual harassment;
- discrimination;
- abuse;
- psychosocial hazards;
- respectful workplace behavior;
- reporting procedures;
- student safety;
- incident management; and
- relevant College policies.

Managers and staff with responsibility for handling complaints will receive appropriate guidance or training.

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30. PROFESSIONAL BOUNDARIES

Staff, trainers and contractors must maintain appropriate professional boundaries with students.

This includes:

- avoiding inappropriate personal relationships with students;
- using appropriate communication channels;
- avoiding inappropriate physical contact;
- maintaining confidentiality;
- not requesting inappropriate personal information;
- not engaging in sexual or suggestive communications;
- not exploiting student vulnerability; and
- reporting concerns about inappropriate conduct.

31. ONLINE SAFETY

The same standards of behavior apply online.

Prohibited conduct includes:

- cyberbullying;
- abusive messages;
- threats;
- harassment;
- sharing inappropriate images;
- sexual harassment;
- discriminatory comments;
- impersonation;
- repeated unwanted contact; and
- misuse of College systems.

Evidence such as emails, screenshots and messages may be retained for investigation.

32. BREACHES OF THIS POLICY

A breach of this Policy may result in appropriate action.

For staff and contractors, action may include:

- counselling;
- direction;
- training;
- formal warning;
- disciplinary action;
- suspension;
- termination of employment or engagement; or

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- referral to an external authority.

For students, action may include:

- counselling;
- behavioral direction;
- intervention;
- warning;
- disciplinary action;
- suspension where permitted;
- removal from a placement;
- cancellation of enrolment where permitted; or
- referral to an external authority.

Any action will be taken in accordance with applicable legislation, contractual arrangements, College policies and procedural fairness requirements.

33. MANAGEMENT OF CONFLICTS OF INTEREST

Any person involved in handling a complaint must disclose an actual, potential or perceived conflict of interest.

Where appropriate, the College will appoint an alternative person to manage or investigate the matter.

A person who is the subject of a complaint must not determine the outcome of that complaint.

34. PROCEDURAL FAIRNESS

The College will seek to ensure that:

- complaints are considered objectively;
- relevant persons are given an appropriate opportunity to respond;
- decisions are based on available evidence;
- conflicts of interest are managed;
- confidentiality is maintained as far as practicable; and
- decisions are documented.

35. APPEALS AND REVIEW

Where a formal decision is made under this Policy, the affected person may seek review in accordance with the relevant College complaints, appeals or disciplinary procedure.

Where an external review mechanism is available, the College will provide information about the relevant pathway.

36. RELATED POLICIES AND PROCEDURES

This Policy should be read together with:

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- Student Code of Conduct;
- Staff Code of Conduct;
- Student Complaints and Appeals Policy;
- Staff Grievance Policy;
- Student Welfare and Support Policy;
- Critical Incident Policy;
- Emergency Management Procedure;
- Incident Reporting Procedure;
- Risk Management Policy;
- Privacy Policy;
- Discrimination and Equal Opportunity Policy;
- Sexual Harassment Policy;
- Student Intervention and Course Progress Policy;
- Work Placement Policy and Procedures;
- Staff Performance Management Policy; and
- Records Management Policy.

37. POLICY REVIEW

This Policy will be reviewed:

- at least annually;
- following significant legislative or regulatory changes;
- following a serious incident;
- following significant changes to College operations; or
- where monitoring identifies that amendments are required.

The review will consider:

- incident and complaint data;
- WHS risks;
- psychosocial hazards;
- student and staff feedback;
- legislative changes;
- regulator guidance;
- effectiveness of controls; and
- corrective actions.

39. STAFF AND STUDENT ACKNOWLEDGEMENT

All staff and students are expected to familiarize themselves with this Policy and comply with the behavioral and safety requirements applicable to them.

By participating in College activities, students and workers are expected to contribute to a safe, respectful and inclusive environment.

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