

We acknowledge the traditional custodians of this land, the Wurundjeri people, and pay our respects to the elders both past and present.

Bullying, Discrimination and Harassment		
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CONTENTS

COMMENCEMENT OF POLICY	2
APPLICATION OF THE POLICY.....	2
DEFINITIONS	2
BULLYING	2
DISCRIMINATION	3
HARASSMENT	3
SEXUAL HARASSMENT	4
REASONABLE PERSON TEST	5
POLICY	5
SEXUAL HARASSMENT	6
RESPONSIBILITIES.....	6
REDUCING THE RISK OF WORKPLACE BULLYING AND HARASSMENT	7
PROCEDURE	7
RESPONDING TO BULLYING AND HARASSMENT	8
<i>Speak to the Other Person</i>	<i>8</i>
<i>Witnesses.....</i>	<i>8</i>
<i>Seek Advice.....</i>	<i>9</i>
<i>Report the Behaviour.....</i>	<i>9</i>
INTERVENTIONS	10
<i>Informal Intervention.....</i>	<i>10</i>
<i>Formal Intervention</i>	<i>10</i>
<i>Conflict of Interest</i>	<i>11</i>
COURSES OF ACTION.....	11
<i>Disputes Over Courses of Action</i>	<i>11</i>
IF YOU ARE ACCUSED OF WORKPLACE BULLYING OR HARASSMENT	12
<i>Give the Complaint Serious Consideration</i>	<i>12</i>
<i>Seek an Objective Opinion About the Behaviour.....</i>	<i>12</i>
<i>Adjust Unreasonable Behaviour.....</i>	<i>13</i>
RESOURCES	13

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EMPLOYEE ASSISTANCE PROGRAM.....	13
INFORMATION ABOUT WORKPLACE BULLYING AND HARASSMENT.....	14
EXTERNAL COMPLAINTS.....	14
RELATED POLICIES AND LEGISLATION	14
POLICIES AND PROCEDURES	14
LEGISLATION	14
DOCUMENT VERSION CONTROL AND REVIEW HISTORY	15
AUTHORITY	15

COMMENCEMENT OF POLICY

This Policy will commence from 02 June 2025. It replaces all other San Carlo Bullying and Harassment policies (whether written or not).

APPLICATION OF THE POLICY

This Policy applies to all workplace participants at San Carlo, including employees, agency staff, contractors, and volunteers. This Policy does not form part of any employee's contract of employment, nor does it form part of any other workplace participant's contract for service.

DEFINITIONS

BULLYING

Bullying is repeated unreasonable behaviour by a workplace participant towards another workplace participant that creates a risk to health and safety. Bullying does not necessarily include an argument or disagreement between colleagues, a one-off act, or violent outburst, although each of these acts can require intervention by San Carlo.

Bullying includes any behaviour that:

- belittles;
- provides unconstructive and unjustified criticism of others;
- isolates a person from or in their workplace;
- undermines a workplace participant's performance, including the deliberate withholding of work-related information and/or resources;
- involves teasing or making an individual the brunt of practical jokes and pranks;
- puts down, scares, intimidates or offends someone;
- involves displaying written or pictorial material which degrades or offends;
- involves yelling, verbal abuse, or the use of offensive language;

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- involves insulting or making inappropriate comments about a person's appearance or lifestyle; and/or
- otherwise poses a risk to another person's physical or mental health, safety, or well-being.

Bullying does not include reasonable management action such as performance management or disciplinary processes provided such processes are carried out in a reasonable manner.

DISCRIMINATION

Discrimination occurs when a person is subjected to unfavourable treatment in employment because they belong to a particular group of people or because they have a particular personal characteristic that has been specified in law as a ground of discrimination.

Some grounds for discrimination recognised in State and Federal legislation include:

- sex or gender
- marital status;
- pregnancy, potential pregnancy, parental status, breastfeeding and/or family responsibility;
- sexual preference or orientation;
- gender identity;
- mental or physical disability, impairment or handicap;
- race, national or ethno-religious origin, nationality, ethnicity, descent, and/or ancestry;
- age
- religious or political beliefs/activity;
- trade union activity; and
- personal association with or relation to any person who is identified on the basis of any of the above attributes.

HARASSMENT

Harassment is any form of behaviour which is unwelcome, uninvited, and/or unreciprocated that a reasonable person would regard as being:

- offensive;
- humiliating;
- intimidating;

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- belittling;
- undermining;
- frightening;
- excluding; and/or
- embarrassing.

Harassment also constitutes any form of discrimination.

Workplace harassment usually consists of a pattern of unwelcome behaviour. However, unlike bullying, discrimination and harassment does not require repeated conduct or behaviour. It can consist of just one act of a serious nature. There is no requirement for the harasser to have intended to offend or harm for the action to be considered harassment.

SEXUAL HARASSMENT

Sexual harassment is any unwelcome conduct of a sexual nature, including a sexual advance, request for sexual favours, or other conduct in circumstances in which a reasonable person, having regard to all the circumstances, would have anticipated the possibility that the person harassed would be offended, humiliated or intimidated. A lack of intent is no defence in sexual harassment cases.

Examples of sexual harassment include, but are not limited to:

- intrusive enquires into a person's private life
- reference to a person's sexuality
- obscene, suggestive, or offensive comments about a person's clothing or physical appearance
- unwanted body touching or physical molesting of a person
- standing too close
- unwanted brushing against another's body
- indecent exposure
- sexual assault
- obscene, suggestive, or offensive communications (including electronic communications)
- pornographic or offensive posters, handouts, or screensavers
- sexual jokes or anecdotes
- leering or staring
- unwanted sexual compliments or excessive flirting.

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Sexual harassment can occur at any level of the organisation, can be experienced by both men and women, and can involve a co-worker, volunteer, supervisor, manager, service provider, resident, or client.

For the avoidance of uncertainty, sexual harassment is not behaviour which is based on mutual attraction, friendship and respect between consenting adults.

REASONABLE PERSON TEST

The reasonable person test is an objective measure of determining whether a person's conduct is reasonable or appropriate for the specific circumstances. In this test, the decision-maker takes on the perspective of a reasonable person who is considered to be a sensible and risk-conscious member of society.

In the context of workplace harassment, including sexual harassment, this test can be used to determine whether a person's response (e.g. fear, embarrassment, intimidation, sense of exclusion) to potential harassing behaviour is reasonable.

POLICY

San Carlo does not tolerate bullying, discrimination, harassment or sexual harassment in any form. Workplace participants who believe they are experiencing bullying, discrimination or harassment (including sexual harassment) are encouraged to raise the issue with a manager/supervisor or a member of San Carlo's Senior Management.

No workplace participant at any level is permitted to subject a workplace participant, resident, client, or visitor to San Carlo to any form of bullying, discrimination or harassment (including sexual harassment). A breach of this policy will result in disciplinary action up to and including termination of employment. Depending upon the severity of the case, consequences for the workplace participant engaging in bullying, discrimination or harassment can include:

- issuing a formal apology,
- counselling;
- demotion;
- dismissal; or
- other forms of disciplinary action as deemed appropriate by San Carlo.

Allegations of bullying, discrimination or harassment (including sexual harassment) in the workplace may be subject to investigation and discipline in line with San Carlo's Counselling and Discipline Policy (Policy 2.2B).

Managers who fail to take appropriate action when made aware of allegations of bullying, discrimination or harassment may also be subject to disciplinary action up to and including termination of employment.

SEXUAL HARASSMENT

Sexual harassment is unlawful under the *Sex Discrimination Act 1984* (Cth) and the *Equal Opportunity Act 2010* (Vic). San Carlo does not tolerate sexual harassment under any circumstances. Our legislative obligations establish the minimum standard of behaviour for all persons in the workplace and provide that San Carlo may be vicariously liable for sexual harassment occurring in the workplace.

San Carlo is committed to eliminating and preventing sexual harassment in the workplace. Workplace participants who believe they are the subject of sexual harassment are encouraged to take firm and prompt action by notifying their manager/supervisor or San Carlo Senior Management.

Any reports of sexual harassment will be treated seriously and dealt with promptly with sensitivity and confidentiality. Disciplinary action up to and including termination of employment or engagement with San Carlo may be taken against any workplace participant who victimises or retaliates against a person who has made a complaint of sexual harassment. Workplace participants may also seek assistance from the relevant tribunal or legislative body to assist them in the resolution of any concerns relating to sexual harassment.

Managers or supervisors who fail to take appropriate action when made aware of alleged sexual harassment in the workplace may be subject to disciplinary action up to and including termination of employment.

RESPONSIBILITIES

It is the responsibility of the **Chief Executive Officer (CEO)** and **Senior Management** to ensure that:

- they understand and are committed to the right of all workplace participants to attend work and perform their duties without fear of being sexually harassed in any form;
- clearly defined policies and procedures are established for handling workplace bullying, discrimination and harassment;
- reasonable steps are taken to eliminate and prevent bullying, discrimination, harassment and sexual harassment in the workplace, including discouraging such conduct and behaviour;
- workplace participants are made aware of their obligations in relation to providing a workplace free from bullying, discrimination and harassment;
- immediate and firm action is taken in response to allegations of bullying, discrimination or harassing behaviour;
- their own behaviour sets an appropriate example for workplace participants;
- all complaints are treated seriously and confidentially;
- factual and accurate records of bullying, discrimination and harassment complaints are kept; and
- education is provided to staff regarding bullying, discrimination and harassment in the workplace and discussed as a regular agenda item in staff meetings.

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It is the obligation and responsibility of all **workplace participants** to ensure that they:

- refrain from displaying bullying, discriminatory or harassing behaviours towards residents, relatives, supervisors, managers, and other workplace participants;
- treat all persons in the workplace, including residents and visitors, with respect and dignity;
- comply with San Carlo's Code of Conduct and other applicable policies and procedures, including this policy, at all times during employment or engagement with San Carlo; and
- report all incidents and/or allegations of bullying, discrimination and harassment including sexual harassment to a member of Senior Management. Behaviour that involves violence (e.g. physical assault or the threat of physical assault) should be reported to the police.

REDUCING THE RISK OF WORKPLACE BULLYING, DISCRIMINATION AND HARASSMENT

The following strategies are in place to reduce the risk of workplace bullying, discrimination and harassment (including sexual harassment) occurring:

- workplace participants are provided with clear standards and expectations for their behaviour in the workplace (for example, via the Code of Conduct and this policy);
- safe work systems are in place that clearly defining the roles of each workplace participant and provide them with the resources, information, and training they need to carry out their work safely;
- reporting and response procedures are in place to respond to reports of workplace bullying, discrimination and harassment (including sexual harassment).
- productive and respectful workplace relationships are developed through good management practices and effective communication (for example, ensuring workplace meetings occur, issuing newsletters and meeting minutes);
- workplace participants are provided with ongoing information and training regarding workplace policies and procedures, available support and assistance, and how to prevent and respond to workplace bullying, discrimination and harassment (including sexual harassment).

If you need extra support to identify whether you or another workplace participant you know is experiencing workplace bullying, you can discuss the situation with the Human Resources Manager, a Health and Safety Representative (HSR), or a union representative.

PROCEDURE

RESPONDING TO BULLYING, DISCRIMINATION AND HARASSMENT

Workplace participants who believe they are experiencing bullying, discrimination or harassment (including sexual harassment) should first try to remove themselves from the situation. Where the workplace participant feels safe and comfortable doing so, they can make the perceived perpetrator(s) aware that they find the behaviour offensive, unwelcome, intimidating and/or unacceptable.

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If the behaviour continues, or if the workplace participant feels unable to speak to the perpetrator(s) directly, they can contact a member of Senior Management. Alternatively, the workplace participant can contact another senior staff member who they feel comfortable with.

Speak to the Other Person

If you feel safe and comfortable doing so, you may calmly tell the other person that you object to their behaviour and ask that it stop. They may not realise the effect their behaviour is having on you or others, and your feedback can give them the opportunity to change their actions.

Depending on the circumstances, it may be helpful to suggest an alternate way for the person to behave that you find more acceptable. When taking this approach, it is important to remain calm and try to clearly communicate how the other person can improve.

If you choose to deal with the situation personally you should consider:

- acting as early as possible (i.e. when the behaviour first occurs);
- raising your concerns informally and in a non-confrontational manner;
 - for example, you could say “I felt hurt by the way you spoke to me before. Can we talk about that?”
- not engaging in retaliatory behaviour;
 - if the person is not responding to attempts to discuss their behaviour politely, it is best to withdraw from the situation and raise the issue with your manager or the HR Manager.
- focusing on the unwanted behaviour and how it makes you feel, rather than criticising the person; and
- being open to feedback.

You can ask another workplace participant (e.g. your manager/supervisor, HR Manager or San Carlo’s Senior Management) for assistance and support in this area, including accompanying you when you approach the person.

Witnesses

Workplace participants who witness bullying, discrimination or harassment (including sexual harassment) in the workplace should report the incident to their supervisor/manager or to another member of San Carlo’s Senior Management.

In cases where bullying, discrimination or harassment is occurring and the witness feels safe and comfortable doing so, they can intervene to assist the person being bullied, discriminated against or harassed. Possible strategies for intervention include, but are not limited to:

- approaching the perpetrator(s) in a calm manner and firmly asking them to stop the behaviour (Note: this is a very direct approach that may not always be suitable or appropriate);

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- engaging the person being bullied, harassed or discriminated against in a supportive conversation and asking what you can do to help; and/or
- providing the person being bullied, harassed or discriminated against with an opportunity to remove themselves from the situation (e.g. asking for their help with a task in another area of the workplace).

Where appropriate, the workplace participant can offer to support the victim in reporting the incident or accessing other support networks (e.g. the San Carlo Employee Assistance Program).

Seek Advice

If you are unsure about what to do if you have experienced or witnessed workplace bullying, discrimination or harassment, it can be helpful to seek advice from an independent person.

Advice should be sought from someone who is objective and impartial and who has knowledge of the options available for dealing with workplace bullying, discrimination and harassment. This could include:

- your manager or supervisor;
- San Carlo's HR Manager;
- a Health and Safety Representative (HSR);
- a union representative; and/or
- San Carlo's Employee Assistance Program.

Report the Behaviour

Workplace bullying, discrimination and harassment should always be reported. If you believe you are experiencing or witnessing this behaviour or conduct, you should report it as early as possible.

You can make a report verbally or in writing, including by:

- Informing your supervisor or manager;
- Informing San Carlo's HR Manager or another member of San Carlo's Senior Management;
- informing a HSR or union representative and asking them to make a report on your behalf; or
- completing a Staff Incident/Accident Form.

If your supervisor is the person whose behaviour is concerning you, consider reporting their behaviour through other channels (e.g. through your HSR or another member of San Carlo's Senior Management).

The manager/supervisor must support the workplace participant and aim to ascertain the nature of the complaint and the wishes of the victim.

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INTERVENTIONS

Informal Intervention

Informal intervention generally involves an informal meeting between the alleged perpetrator(s), the complainant and an appropriate manager. The focus of this meeting is usually mediation or conciliation.

The meeting should aim to address the following matters:

- the complainant's main concerns;
- strategies for resolving the conflict between the parties;
- the expected standard of behaviour for all staff members;
- the avenues of support that are available to all parties; and
- plans for moving forward (e.g. moving to formal intervention).

If the behaviour continues formal interventions should be considered.

Informal intervention may not be appropriate in all circumstances. San Carlo retains the ultimate discretion to determine whether the matter will be dealt with via formal or informal intervention taking into consideration factors including, but not necessarily limited to, the severity or seriousness of the alleged conduct, the complainant's desired outcome, whether this is the first complaint made against the perpetrator(s) and the risk to other workplace participants.

Formal Intervention

Formal interventions may involve an investigation or other disciplinary action.

Where an investigation is deemed appropriate, the investigator should be an impartial party who is not directly involved in the alleged bullying, discrimination and/or harassment incident(s).

During the investigation, the parties involved will each be given the chance to provide their perspective and the perpetrator(s) will be provided with the opportunity to respond to the allegations.

After the investigation is concluded, a course of action can be decided based on the investigation findings. Where the allegations are substantiated, disciplinary action may be taken in accordance with the Counselling and Discipline policy (Policy 2.2B).

Conflict of Interest

Managers who are involved in the alleged incident(s) of bullying, discrimination and/or harassment must not conduct the investigation or carry out any interventions.

If the complainant or the manager involved in the intervention has any concerns regarding a conflict of interest, these should be raised with San Carlo's Senior management before any action is taken.

COURSES OF ACTION

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If the investigation determines that bullying, discrimination or harassment has occurred, possible courses of action include, but are not limited to, any combination of the following:

- counselling the perpetrator(s) on appropriate workplace conduct and behaviour;
- conciliation/mediation conducted by an impartial third party where the parties to the complaint agree to a mutually acceptable resolution; and/or
- disciplinary action against the perpetrator(s) (e.g. issuing a warning, demotion or transfer, dismissal from employment).

Outcomes depend upon factors such as:

- the severity and frequency of the bullying, discrimination and/or harassment;
- whether the perpetrator(s) could reasonably have been expected to know that such behaviour was a breach of policy;
- the level of genuine contrition displayed by the perpetrator(s); and
- whether there have been any prior incidents or warnings involving or given to the perpetrator(s).

If there is strong evidence that the initial complaint was discriminatory, knowingly false, or made with malicious intent, disciplinary action may also be taken against the person who made the complaint.

Disputes Over Courses of Action

Where possible, it is preferred that disputes over the decided course of action be resolved at an organisational level. This could involve escalating the issue to the CEO or the Board, if necessary.

If the complainant and/or the alleged perpetrator(s) is/are not satisfied with the investigation process or the course(s) of action that are taken, and is unable to resolve this at an organisation level, they can raise the matter with external bodies such as:

- **WorkSafe Victoria** – can provide advice and assistance about workplace bullying, discrimination and harassment, as well as providing appropriate referrals to other bodies.
- **The Australian Human Rights Commission (AHRC)** – accepts complaints of workplace bullying, harassment or discrimination under federal laws. The AHRC uses conciliation between parties to reach a resolution.
- **Fair Work Commission** – can assist with resolving issues of bullying and/or sexual harassment either through mediation or, if necessary, conducting a formal hearing. The Commission cannot order monetary compensation for the workplace participant(s) involved, but can issue orders for the bullying/sexual harassment to stop.
- **Victorian Equal Opportunity and Human Rights Commission (VEOHRC)** – accepts complaints of workplace bullying, harassment, or discrimination under Victorian and federal laws. The VEOHRC uses conciliation to resolve complaints.
- **Victorian Civil and Administrative Tribunal (VCAT)** – accepts complaints of unlawful

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discrimination and/or sexual harassment under Victorian laws. VCAT may use conciliation and/or a formal hearing to resolve complaints.

IF YOU ARE ACCUSED OF WORKPLACE BULLYING, DISCRIMINATION OR HARASSMENT

Being accused of bullying, discriminatory or harassing behaviour can sometimes be shocking and upsetting. It is important to keep an open mind about receiving feedback from others and, if necessary, be prepared to change your behaviour.

Give the Complaint Serious Consideration

If someone approaches you about your behaviour, try to remain calm and avoid aggravating what is likely to already be a difficult situation.

Listen carefully to the concerns the person expresses and try to understand their point of view. Discuss how the two of you might work together more effectively.

The other person is more likely to share their views with you if you choose a neutral space to discuss the situation and ask open questions without attempting to justify your behaviour. Even so, the other person may not be comfortable speaking to you. Do not pursue any discussions if the other person is uncomfortable. In some cases, San Carlo may direct you to not approach the person who has raised concerns regarding your conduct or behaviour.

Seek an Objective Opinion About the Behaviour

If you do not understand the complaint or would like a second opinion about your behaviour, discuss the matter with someone you trust. This might be your manager or a counsellor engaged through the Employee Assistance Program.

Any discussion should be strictly confidential. It is important not to unintentionally escalate the situation by discussing the issue openly. In circumstances where there is an active investigation underway, it is not appropriate for you to discuss the complaint or the allegations made against you with the person who has raised the complaint or other participants in the investigation, such as other workplace participants who may be potential witnesses to the incident(s).

If you believe you are being unjustly accused, or the complaint is malicious, you should discuss this with your manager or San Carlo's HR Manager.

Adjust Unreasonable Behaviour

If you have been made aware that your behaviour is considered unreasonable, stop or modify the behaviour and review what you are doing.

If, after careful consideration, you believe that your behaviour is reasonable management action, you should discuss this with your supervisor, manager, or San Carlo's HR Manager.

Even in those circumstances, it may be possible to modify future management action to minimise the risk that others might find it unreasonable.

If you are found to have continued to bully, discriminate against, or harass someone after they have

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made you aware that they object to your behaviour, your persistence or unwillingness to adjust your behaviour is likely to be taken into account in disciplinary proceedings.

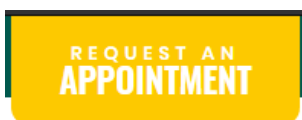
RESOURCES

EMPLOYEE ASSISTANCE PROGRAM

San Carlo's Employee Assistance Program (EAP) is a work-based counselling program designed to enhance the emotional, mental, and general psychological wellbeing of all San Carlo employees. It includes services for the immediate family members of San Carlo's employees.

The process of contacting the EAP is confidential between the employee and Acacia Connection. Their services are available 24/7. You can call, text, or chat with them online:

- By phone call: **1300 364 273 (General support line)** OR **1300 214 958 (LGBTQIA+ support line)**
- By text message: **0401 337 711**
- By website: acaciaconnection.com – Yellow "**Request an Appointment**" button in the top right corner.



- By online chat on website: acaciaconnection.com – green "**Chat Now**" button in the bottom right corner.



INFORMATION ABOUT WORKPLACE BULLYING, DISCRIMINATION AND HARASSMENT

- BeyondBlue: [Work and mental health - Beyond Blue](#)
- Worksafe Victoria: [Bullying | WorkSafe Victoria](#)
- Worksafe Victoria: [Work-related sexual harassment: Know your rights | WorkSafe Victoria](#)

EXTERNAL COMPLAINTS

- Fair Work Commission –
[What to do if you're bullied at work | Fair Work Commission \(fwc.gov.au\)](#) or
[What to do if you're sexually harassed in connection with work | Fair Work Commission \(fwc.gov.au\)](#) or
[Discrimination | Fair Work Commission \(fwc.gov.au\)](#)
- Australian Human Rights Commission –
<https://humanrights.gov.au/complaints/make-complaint>
- Victorian Equal Opportunity and Human Rights Commission –
<https://www.humanrightscormission.vic.gov.au/discrimination/making-a-complaint>

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- Victorian Civil and Administrative Tribunal –
- [Unlawful discrimination, sexual harassment, victimisation or vilification | VCAT](#)

RELATED POLICIES AND LEGISLATION

POLICIES AND PROCEDURES

- 2.9B Equal Employment Opportunity
- 2.2B Counselling and Discipline
- 2.2D Grievance and Dispute Resolution
- 2.5A Occupational Violence and Aggression
- Code of Conduct and Ethics

LEGISLATION

- *Fair Work Act 2009* (Cth)
- *Human Rights and Equal Opportunity Commission Act 1986* (Cth)
- *Sex Discrimination Act 1984* (Cth)
- *Age Discrimination Act 2004* (Cth)
- *Disability Discrimination Act 1992* (Cth)
- *Workplace Gender Equality Act 2012* (Cth)
- *Equal Opportunity Act 2010* (Vic)
- *Racial and Religious Tolerance Act 2001* (Vic)
- *Charter of Humans Rights and Responsibilities Act 2006* (Vic)
- *Occupational Health and Safety Act 2004* (Vic)
- *Occupational Health and Safety Regulations 2017* (Vic)

DOCUMENT VERSION CONTROL AND REVIEW HISTORY

Version	Date	Sections Modified	Author	Approved By	Next Review
1.0	01-07-2018	All	San Carlo	Rhonda Joiner	July 2019
1.1	01-10-2019	All	San Carlo	Rhonda Joiner	October 2020
2.0	20-10-2021	All	San Carlo	Rhonda Joiner	October 2023
3.0	15-05-2024	All	San Carlo	Rhonda Joiner	May 2027
4.0	02-06-2025	All	San Carlo	Ron Hooton	June 2028

AUTHORITY

This policy is authorised under delegation by:

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SANCARLO
HOMES FOR THE AGED

A handwritten signature in dark gray ink, appearing to read 'R. Hooton'.

Ron Hooton
Chief Executive Officer

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