

Complaints Procedure (Staff)

Section 1 - Summary

(1) This Procedure:

- a. outlines the steps Victoria University (VU or University) will follow in handling complaints raised by its staff and /or against its staff; and,
- b. reflects VU's commitment to person-centred and trauma-informed practice, ensuring complaints are handled with sensitivity, respect, and a focus on safety and wellbeing—supported by staff training, minimising re-traumatisation, offering choice and control, and upholding cultural safety, confidentiality, and privacy.

Section 2 - Scope

(2) This Procedure applies to all VU staff, this includes:

- a. All staff across the University, in all domestic and offshore locations and while engaged in any work-related activities including but not limited to conferences and work-sponsored social occasions;
- b. All contractors and consultants performing work on University sites or on behalf of the University;
- c. Visiting academics, honorary, adjunct and exchange staff;
- d. The Council and its committee members;
- e. Any volunteer in the workplace and study environment.

(3) This Procedure applies to all complaints about:

- a. The behaviour of any person (e.g. bullying, discrimination, harassment).
- b. The administrative practices of VU.
- c. The application or misapplication of University policy and procedure.

(4) This Procedure will not apply to any decision regarding a staff member that has been made under a policy or procedure that provides its own review mechanism. Examples of these are provided in the [Complaints Policy](#).

(5) This Procedure operates in conjunction with the applicable VU Enterprise Agreements and does not limit any rights available to staff under applicable industrial instruments, legislation or external complaint bodies. Where an employee has sought to resolve their complaint through an external process, VU may suspend or discontinue action under this Procedure if it considers it is appropriate or prudent to do so to avoid duplication or conflicts.

Section 3 - Policy/Regulation

(6) [Complaints Policy](#)

Section 4 - Procedures

Part A - Summary of Roles and Responsibilities

Roles	Responsibilities
Staff	Behaving in accordance with the principles of VU's Appropriate Workplace Behaviour Policy and all other related policies Participating in the process whilst maintaining confidentiality at all times Complying with any controls put in place
Managers and Supervisors of staff	Where possible, identify issues early and encourage informal resolution where appropriate Respond promptly and fairly to all concerns or complaints Seek advice from People and Culture (P&C) when required Remain impartial and maintain confidentiality throughout the process Keep a clear record of actions taken, including informal steps, to ensure transparency and accountability Lead a positive workplace culture Model appropriate behaviour in the workplace Apply person-centred and trauma-informed approaches when engaging with complainants and respondents and provide any person who makes a disclosure with information or a referral to appropriate service for support, reporting and investigation
People and Culture representatives	Liaise with Managers/Supervisors to provide support for complaint handling Appoint facilitators and/or investigators where required Provide information and advice to staff as needed Act as the University's centralised point of contact for staff within the University community seeking support or referral Work with the relevant supervisor/manager to determine and provide complaint outcomes Be mindful that they may be the first person an alleged offence has been disclosed to and ensure trauma-informed practices are applied, including minimising repeated disclosures, offering choices in how to engage, and tailoring support to individual needs
Chief Human Resources Officer	Review complaint matters where a party to a complaint presents valid grounds for procedural review

Part B - Overview

(7) All staff complaints are submitted through the central [VU staff Complaints Portal](#). The relevant staff manager will assess the complaint and:

- Manage the matter directly in accordance with this Procedure and the associated [Complaints Policy](#); or
- Refer the matter to a more appropriate internal process or policy (e.g. whistleblower disclosures).

(8) VU reserves the right to determine the most appropriate method to manage a complaint and may implement interim measures at any stage of the complaints process to protect the safety and wellbeing of staff and/or students, including workplace adjustments, temporary relocation, or modified reporting arrangements.

(9) All complaints will be managed in a manner that prioritises the safety, dignity, and autonomy of the complainant.

(10) At VU's discretion, staff complaints involving multiple issues may be dealt with either collectively or individually.

(11) Complaints involving Gender-Based Violence will be managed in line with the [Gender-based Violence Policy](#), by staff with appropriate training, and may require coordinated risk assessments, tailored support plans, and/or distinct response pathways.

Part C - Local-level resolution

(12) Where safe and appropriate to do so, staff should make genuine attempts to resolve matters early through informal means. Informal resolution does not require a written complaint and may involve direct communication between the complainant and the individuals concerned.

(13) Complaints that are not suitable for local level (or informal) resolution may be raised through the [VU staff Complaints Portal](#). Informal resolution is not a prerequisite for lodging a formal complaint via the Portal.

(14) Informal resolutions, whether provided in writing or not, can be lodged as a formal complaint if the informal resolution proves unsuccessful.

(15) Staff can seek assistance from their manager/supervisor, P&C and/or an independent support person at any time throughout the complaint process.

(16) Staff may also seek advice or support from appropriate specialists such as the [Employee Assistance Program \(EAP\)](#). The EAP is a free, confidential, externally managed service available to employees, offering assistance by working with staff to develop strategies to address and resolve their concerns.

Part D - Lodging a Complaint

(17) Staff should lodge a complaint through the [VU staff Complaints Portal](#) or with a manager/supervisor directly. Those unable to access the online portal may contact the Student Complaints and Integrity Office or P&C to request a hard copy complaint form. VU may commence a formal process without a written complaint if required.

(18) The University's ability to respond to anonymous reports is limited as no follow-up engagement, clarification or seeking additional information is possible with the discloser. If possible, the University may contact complainants to provide advice about options and referrals to support services.

(19) Complainants will be offered choices about how their complaint is managed, including the option to pause, withdraw, or change the process at any time.

Part E - Preliminary assessment and triage

(20) When a complaint is lodged, a preliminary assessment and triage is performed by the relevant manager/supervisor (or their nominee), with the support of People and Culture. This involves:

- a. Completing a preliminary risk assessment;
- b. Assessing whether the matter is a valid complaint, or whether it is frivolous, vexatious or lacking substance;
- c. Considering the emotional and psychological safety of all parties, including minimising re-traumatisation by avoiding repeated disclosures
- d. Whether the matter warrants an investigation; and
- e. If the alleged conduct/behaviour may constitute a breach of the [Appropriate Workplace Behaviour Policy](#).

(21) VU will endeavour to conduct a preliminary assessment of a complaint within 10 working days of receipt, and to conclude investigations within 30 working days, unless the complexity of the matter warrants a longer investigation period.

(22) The manager/supervisor should contact P&C for advice and assistance before commencing any intervention (see Part F below). Once intervention has commenced, they should inform the complainant of the action taken to resolve the alleged reported behaviour.

(23) VU adopts a flexible approach to complaint resolution and matters may be addressed in one or more of the following ways:

- a. No action where the complaint is found to be frivolous, vexatious or resolved through dialogue;
- b. Intervention by manager/supervisor;
- c. Facilitated discussions;
- d. Investigation; and/or
- e. Disciplinary action.

Part F - Gender-based Violence

(24) Instances of gender-based violence may constitute a sexual offence. The investigation and determination of a sexual offence under the criminal justice system is beyond the University's capacity or jurisdiction. The University will make appropriate referrals to external agencies who may provide individual support or investigation of offences.

(25) Gender-based violence may be investigated under the Staff Enterprise Agreement, or other relevant frameworks, provided the discloser has consented to this approach or the University is obligated to act for safety reasons. VU does not seek to replicate criminal justice processes but recognises its role in maintaining a safe learning and working environment.

(26) VU may investigate matters that arise while a person is employed, or within 12 months of their enrolment or employment ending. Outside of this timeframe, VU may not conduct an internal investigation unless there is an ongoing risk to members of the University community (for example, where the alleged perpetrator remains a current student or staff member).

(27) The initial response by P&C will include:

- a. Providing assistance to disclosers, or any other person involved, to ensure their safety and wellbeing and manage any immediate and/or ongoing risk.
- b. Gathering information to facilitate any appropriate immediate response (security, emergency services etc.).
- c. Support the victim/survivor to seek advice and support, if wanted, from the [Employee Assistance Program \(EAP\)](#).
- d. With consent and where appropriate, referring victim survivors to an appropriate external support service in the area where they are located for counselling and advocacy support, and/or the Sexual Offences and Child Abuse Investigation teams of the Victoria Police (Police).

(28) P&C will undertake a risk assessment and develop support plans for both the Discloser and the Respondent. These plans may include workplace adjustments, safety measures or referrals, and will be tailored to the specific needs and circumstances of each party. Where VU lacks staff with the expertise to conduct a risk assessment, the University will engage a qualified external professional, except where urgent internal action is required.

(29) Where appropriate, staff will be offered a single point of contact to reduce the need for repeated disclosures.

(30) Safer Community and P&C will coordinate with each other and other relevant stakeholders where appropriate to meet with the Discloser of gender-based violence and develop a tailored safety and support plan. This plan will:

- a. Prioritise safety and urgent access to support services;
- b. Assess the workplace for safety and security;
- c. Minimise re-traumatisation by avoiding repeated disclosures;
- d. Include academic and/or work adjustments where appropriate;

- e. Explain the investigation process and the role of the Discloser;
- f. Be informed by a risk assessment conducted by qualified staff;
- g. Outline the management of confidential information and privacy obligations;
- h. Be developed collaboratively with the complainant and tailored to their individual needs, including cultural, linguistic, and accessibility considerations.

(31) The University will also offer a tailored support plan to the Respondent, which may include:

- a. Access to support services;
- b. Interpreter or translation assistance;
- c. Risk assessment and academic or workplace adjustments;
- d. Explanation of disciplinary processes and rights.

(32) Staff assigned to support the Discloser will not be the same as those supporting the Respondent.

(33) Where a matter may require escalation for safety or compliance purposes, the University will seek and consider the views of the discloser before deciding to proceed. The University will notify the discloser if an investigation is to proceed and explain the rationale for this decision. If an investigation is initiated, both the discloser and respondent will be notified on the same day, with the discloser notified first, in accordance with trauma-informed practice. Such action will only be taken where there is an unacceptable level of risk.

(34) The University will not require a Discloser or Respondent to provide physical evidence (such as forensic or medical records) in order to investigate or take action on a disclosure or formal report.

(35) Where a Formal Report relates to gender-based violence and the only connection of the Respondent to VU is their staff status, the University will still consider the safety and wellbeing of students and staff in determining the scope of investigation. Investigations may proceed regardless of where the alleged conduct occurred.

Part G - Complaint Management

Intervention by Manager/Supervisor

(36) Managers or supervisors will typically be the first to respond to staff complaints, making reasonable efforts to understand the issue and address concerns through appropriate support and/or practical solutions.

(37) Intervention by the relevant manager/supervisor may involve one or more of the following (where considered reasonable):

- a. Adjusting work tasks or team arrangements;
- b. Correcting administrative errors or barriers;
- c. Reminding the team or unit of the expected standards of behaviour (without identifying the parties or any particulars of the case);
- d. Meeting with any respondent to appropriately address alleged behaviours;
- e. Arranging appropriate training/staff development; and/or
- f. Suggesting facilitated discussions to the parties (discussed below).

(38) The University will consider what, if any, reasonable action is necessary to protect the wellbeing or safety of the University community.

(39) Depending on the circumstances, the manager/supervisor may review the matter after a period of between 1-3 months. If the situation has not improved, other methods of resolution may be explored.

Facilitated Discussions

(40) Facilitated discussions are voluntary and may be recommended in cases of interpersonal conflict, particularly where the parties have an ongoing working relationship and appear willing to reach a resolution.

(41) With the assistance of an impartial facilitator appointed by P&C in conjunction with the relevant manager/supervisor, parties will have the opportunity to discuss the issues, consider possible solutions, and work towards a mutually acceptable outcome.

(42) The facilitator may meet with the parties separately, together or a combination of both. Their role is to guide the process and support resolution, not to make any formal findings of fact.

(43) Facilitated discussions are confidential. Only the agreed outcome will be reported to P&C and the relevant manager/supervisor.

(44) Facilitated discussions will only proceed with the informed consent of all parties and will be conducted in a manner that prioritises psychological safety.

(45) Facilitated discussions may not be appropriate where there is a significant power imbalance, a risk to health or safety, or where one or more parties are unwilling to participate constructively.

Part H - Investigation

(46) VU may initiate a workplace investigation into staff conduct where it considers this necessary, for example, in the case of complaints relating to complex or serious behavioural matters. When determining whether an investigation is necessary, VU will consider a range of factors, including but not limited to:

- a. Whether the alleged conduct, if proven, could constitute Serious Misconduct; and
- b. Whether any applicable industrial instrument processes may need to be followed;
- c. The potential impact of the alleged conduct on others;
- d. Whether the allegations involve gender-based violence, discrimination, harassment, or bullying;
- e. The existence of disputed facts requiring clarification;
- f. Possible breaches of University policies; and
- g. Obligations under workplace relations, work health and safety, or other applicable laws.

(47) All staff members involved in resolving a complaint must ensure that they comply with VU's [Conflict of Interest Policy](#) in respect of their involvement in the complaints process.

(48) Where early intervention or facilitated discussion has not resolved the situation or is inappropriate, the complaint may be investigated by an independent (internally or externally appointed) person or body that must not have any previous involvement in the matter and will be appointed by People and Culture.

(49) Investigators will be trained in trauma-informed practice and will ensure that interviews and evidence gathering are conducted with sensitivity and respect.

(50) Where a matter is referred for investigation, the investigator will:

- a. notify the parties that an investigation has commenced;
- b. provide all parties with support and assistance, including access to information about appropriate emergency health and counselling; and referral to internal and external support services;
- c. seek sufficient particulars of the alleged conduct to enable a fair and factual assessment;
- d. conduct the investigation in a timely manner, with due regard to procedural fairness and the safety and well-

being of all parties;

- e. interview the parties and, where appropriate, relevant witnesses;
- f. review any relevant documentation and other evidence; and
- g. prepare a written report outlining the investigation process, findings of fact, and any recommendations.

(51) Where a matter is referred to Victoria Police, the University will cooperate fully with the police inquiry. In cases of police involvement, VU may defer action pending the outcome unless immediate protective steps are required.

Part I - Decision-making in Complaint matters

(52) The investigator's written report will be provided to P&C and to the respondent's manager/ supervisor for consideration and a decision as to the appropriate outcome. Where it is not appropriate for the manager/supervisor to make a decision—for example, due to a conflict of interest or their involvement in the complaint—the report will be referred to a senior officer nominated by P&C to determine the outcome.

(53) A formal complaint will be found to be either:

- a. Substantiated;
- b. Substantiated in part; or,
- c. Not substantiated.

(54) Following an investigation, the University may:

- a. Resolve the matter with the agreement of both parties;
- b. Implement safety measures without proceeding to disciplinary action;
- c. Decide not to proceed to disciplinary action where appropriate;
- d. Initiate formal disciplinary proceedings.

(55) A determination that the complaint is substantiated wholly or in part may lead to any combination of the following outcomes, or any other outcome appropriate in the circumstances:

- a. Adjustment to work arrangements, teams or task distribution;
- b. Rectification of administrative error;
- c. Implementation of negotiated solution;
- d. Appropriate training/staff development;
- e. Referral to the Disciplinary Action process where alleged conduct may constitute Misconduct or Serious Misconduct under the relevant industrial instrument;
- f. Changes to processes, procedures, or systems of work; and/or
- g. Further monitoring.

(56) The decision maker may also determine that the complaint is frivolous, vexatious, or lacking in substance. Where the complaint is considered vexatious, VU may initiate disciplinary action against the complainant.

(57) It is expected that the investigation and decision process will be completed in a timely manner and unless by exception, within 30 days. All parties must be kept informed of progress and expected timeframes.

(58) Save for where the outcome involves disciplinary action, the decision, along with a summary of reasons, a clear statement outlining next steps, and an invitation for the complainant to provide feedback, will be communicated to the complainant, the respondent/s, and People and Culture.

(59) Staff complainant may request to remain anonymous when submitting a complaint or during an investigation process. However, staff will be advised that in certain circumstances, this may limit the University's ability to support the complainant and may limit the range of possible outcomes available.

(60) Where a staff complainant requests to remain anonymous, all identifying information will be removed from the initial complaint prior to any referral to third parties for investigation.

Disciplinary Action

(61) VU may, at any stage, initiate disciplinary action against a respondent where the allegations are sufficiently serious and/or where there are reasonable grounds to demonstrate a case to answer.

(62) The nature of disciplinary action will depend on the type and seriousness of the conduct, as well as other relevant factors relating to the staff member's employment and personal circumstances.

(63) Decisions to initiate disciplinary action will be made by the designated decision maker in the relevant industrial instrument, the [Victoria University Enterprise Agreement 2025](#) or [Victoria University Vocational Teacher Enterprise Agreement 2025](#), in consultation with P&C (for staff respondents) or Student Complaints and Integrity (for student respondents), and will be carried out in accordance with the relevant procedure and/or applicable industrial instrument.

(64) Where an industrial instrument applies to a staff respondent, disciplinary action for Misconduct or Serious Misconduct (where applicable) will be determined and imposed under that instrument and may include:

- a. Written Warning, formal censure, or counselling;
- b. Withholding an increment;
- c. Demotion by one or more classification levels or increments;
- d. Transfer to another position within VU, within the same or another organisational unit, campus or site; or
- e. Termination of employment (for Serious Misconduct).

(65) Where a disciplinary process has already commenced in another forum, the relevant decision maker will ensure that the process does not duplicate or substantially overlap with any legal action or resolution process underway on the same matter.

(66) If a person within the Scope of this Procedure is investigated and the report is upheld, that individual may be subject to disciplinary action under the relevant University Policy.

(67) Disciplinary action will also be taken against anyone who retaliates against or victimises a person who has made a disclosure or complaint to the University. Examples of victimisation include but are not limited to:

- a. Excluding or isolating a person after they make a disclosure or complaint or take other action;
- b. Denying promotion or advancement opportunities based on complaint involvement;
- c. Threats, mocking, or public criticism of a person who disclosed or who provided support to a discloser.

(68) The Discloser will be notified in writing of the outcome of the investigation and any disciplinary process on the same day the Respondent is notified, unless the Discloser requests not to be notified of the outcome.

Part J - Interim and protective measures

(69) Where there may be an ongoing risk to the broader University community, P&C (in collaboration with other university services where appropriate) are responsible for identifying risk and implementing appropriate actions to address that risk and to provide a safe work and study environment. This may include providing safe places to work or

study at the University, for both a Discloser and respondent.

(70) If the University determines it necessary to protect the safety and wellbeing of a victim/survivor, any person within the Scope of this Procedure may be subject to the following measures while a police investigation or criminal matter is ongoing, including suspension of a staff member without loss of pay in accordance with clause 74.7 of the Victoria University Enterprise Agreement 2025, or the equivalent provision in the applicable TAFE Teachers Enterprise Agreement, where allegations involve Serious Misconduct.

(71) After finalisation of any police action, criminal proceedings or other legal action, VU will continue to provide assistance and support measures as required to protect the safety and welfare of all parties.

Part K - Review

(72) Subject to any applicable industrial instrument, a complainant may request a review of the complaints process by lodging a written request with P&C within 10 working days of being notified of the decision. Where an industrial instrument provides a right of review, that process will take precedence.

(73) The Review will be conducted by:

- a. The Chief Human Resources Officer or nominee; or
- b. Where the Chief Human Resources Officer has had prior involvement, another senior member of staff nominated by the Vice-Chancellor.

(74) Reviews will be conducted in a timely manner and will consider whether the process undertaken was in accordance with the procedure.

(75) The Reviewer may:

- a. Uphold the original decision;
- b. Uphold the original decision but amend one or more of the outcomes; or
- c. Vacate the original decision and refer the matter for a fresh investigation.

(76) The Reviewer's decision will be communicated in writing to the complainant.

(77) This review constitutes the final avenue of review within VU. Complainants may, however, pursue recourse via external bodies where applicable (e.g. Ombudsman Victoria, Fair Work Commission, Equal Opportunity Commission).

Part L - Support

(78) Support services are available to staff at all stages of the complaint process, including before lodging a complaint, during resolution, and after outcomes are determined.

(79) Support for staff is available from the following services:

- a. [EAP](#);
- b. [Security](#), including the [VU Safe App](#)

(80) Further support off campus is available from the following services:

- a. [Sexual Offence and Child Abuse Investigation Teams](#) (SOCIT);
- b. [Centre against Sexual Assault](#) (CASA);
- c. [Sexual Assault Crisis Line](#);

- d. [National Sexual Assault Domestic Violence Service](#);
- e. [Men's Referral Service](#);
- f. [WestCASA](#)
- g. 1800 RESPECT (1800 737 732)
- h. [inTouch](#) Call 1800 755 988
- i. [Q Life](#) Call 1800 184 527
- j. [Djirra](#) Call 1800 105 303
- k. [Women's Information & Referral Exchange](#) (WIRE) Call 1300 134 130

Part M - Data and Reporting

(81) P&C will report annually to relevant Corporate Governance Committees on the data and trends for staff complaints as detailed in the [Complaints Policy](#). Summary themes and opportunities for improvement will also be provided to relevant areas of the University to support service quality, culture, and process improvement.

Section 5 - HESF/ASQA/ESOS Alignment

(82) HESF: Standards 2.3 Wellbeing and Safety; HESF: 2.4 Student Grievances and Complaints; 6.1.4 Corporate Governance.

(83) National Code of Practice for Providers of Education and Training to Overseas Students 2018: Standards 5 Younger overseas students; 6 Overseas student support services.

(84) Outcome Standards for NVR Registered Training Organisations 2025: Standards 2.6 Wellbeing; 2.7, 2.8 Feedback, Complaints and Appeals. Compliance Standards for NVR Registered Training Organisations and FPP Requirements 2025: Standard 20 Compliance with Laws.

Section 6 - Definitions

(85) Complaint: When a staff member expresses a concern about a work related issue which may include an act, behaviour, decision, situation, omission or problem that the person perceives to be unfair or unjustified; or dissatisfaction about a work situation or a matter which adversely affects their work or work environment.

(86) Complainant: A person who raises a complaint under this procedure.

(87) Discloser: A person making a disclosure of gender-based violence.

(88) Disclosure: The provision of information about a person's experience of gender-based violence to the University by the discloser or another person, however communicated. Disclosures may be made to access support, initiate protective measures, or request formal action. A disclosure may lead to a formal report if the person wishes.

(89) Formal report: The provision, through formal reporting channels, of information about a person's experience of gender-based violence by a discloser to the University, which requires the University to consider taking steps beyond the offer and provision of support services. These steps may include investigation, risk mitigation, or disciplinary proceedings under misconduct processes. Formal reports are made with the discloser's informed consent.

(90) Frivolous complaints: A frivolous complaint is a complaint that is lacking in any substance or merit. Not all frivolous complaints imply an improper motive on behalf of the complainant.

(91) Gender-based Violence

(92) Misconduct: means conduct which is not Serious Misconduct and is unsatisfactory conduct or behaviour.

(93) Respondent: For the purposes of this procedure, a person whom a complaint is raised against.

(94) Representative: For staff, a person chosen by a staff member to represent them in relation to a specific matter or process. Refer to the relevant Enterprise Agreement for more information.

(95) Serious Misconduct: means:

- a. Serious misbehaviour which constitutes a serious impediment to the carrying out of a staff member's duties or to a staff member's colleagues carrying out their duties;
- b. Serious dereliction of the duties required of the position;
- c. Theft or fraud;
- d. Conviction by a court of an offence where that offence constitutes a serious impediment to the carrying out of a staff member's duties or functions or to a staff member's colleagues carrying out their duties or functions;
- e. Examples of conduct which may constitute Serious Misconduct include but are not limited to:
 - i. Assault;
 - ii. Repeated incidents of Misconduct;
 - iii. Serious or repeated bullying or harassment, including sexual harassment;
 - iv. The staff member refusing to carry out a lawful and reasonable instruction that is consistent with the staff member's contract of employment;
 - v. Willful and/or gross breach of the staff member's contract of employment, or VU's policies or regulations, such that it would be unreasonable to continue the staff member's employment.

(96) Support Person: A person who is able to offer support to a complainant, witness or respondent, through attendance at investigations, interviews, or other stages of a complaint. A support person is not to act as an advocate or interfere with the process.

(97) Vexatious Complaints: a complaint with no merit, which is specifically being pursued to harass, annoy or cause financial cost to VU or another person.

(98) Victimisation: In the context of this Procedure, refers to the unfavourable treatment of a person because they have made, or intend to make, a complaint or have participated in the complaint process.

Status and Details

Status	Current
Effective Date	19th December 2025
Review Date	19th December 2028
Approval Authority	Vice-Chancellor
Approval Date	19th December 2025
Expiry Date	Not Applicable
Accountable Officer	Simone Wright Chief Human Resources Officer +61 3 9919 5447
Responsible Officer	Simone Wright Chief Human Resources Officer +61 3 9919 5447
Enquiries Contact	April Vocale Student Complaints and Integrity Manager april.vocale@vu.edu.au

Glossary Terms and Definitions

"Gender-based Violence" - means any form of physical or non-physical violence, harassment, abuse or threats, based on gender, that results in, or is likely to result in, harm, coercion, control, fear or deprivation of liberty or autonomy. VU recognises that this includes sex discrimination, sexual harassment, sex-based harassment, conduct that creates a hostile work or study environment on the ground of sex, and victimisation, all of which are unlawful under the Sex Discrimination Act 1984 (Cth).