FAR NORTH QUEENSLAND LAW ASSOCIATION

2017 CONFERENCE

Discrimination, bullying, harassment and adverse action: Appropriate protections or political correctness gone mad?

Workplaces are microcosms of society – Their disputes reflect societal shifts and clashes. The Fair Work Act's expansion of forums for employee disputes arising from claims of discrimination, bullying, harassment and adverse action has not been without controversy. Questions arise as to whether the salacious headlines of the Nation's newspapers regarding sexual harassment and the raging debates over the efficacy of racial vilification laws truly reflect the state of the law and its effect.

1. In this seminar we will first consider the purported prevalence of the alleged conduct and an awareness of the recent key decisions in employment and discrimination law, an understanding of the current trends and hot spots regarding employment disputes, an appreciation of the current legal obligations of employers to employees including within their own firms and a practical insight into how these issues play out in their own professional deals and their impact on the profession.

2. These notes are to provoke discussion but are not fulsome in terms of the way that we will appropriate the question posed at the outset.

Purported Prevalence of Sexual Harassment

3. According to the most recent statistical data, approximately one fifth of the complaints received by the Australian Human Rights Commission under the *Sex Discrimination Act 1984* (Cth) concerned claims of sexual harassment. This percentage has remained mostly stable over the last five years.

SH complaints received by AHRC over the past five years[1]

Year	**2011-12**	**2012-13**	**2013-14**	**2014-15**	**2015-16**
No. of complaints	262	215	222	212	217
% of total SDA complaints	25% (1046)	21% (1029)	18% (1231)	19% (1096)	22% (984)

4. Despite expanding legislative *protections* sexual harassment (or perceived harassment) continues to be an issue in Australian workplaces.

5. In 2012, a national survey conducted by the AHRC demonstrated that one in four women believed she had experienced sexual harassment during the course of her

[1] Australian Human Rights Commission, *Complaint Statistics 2015-2016* < https://www.humanrights.gov.au/sites/default/files/AHRC 2015 - 2016 Complaint Statistics.pdf>.

employment. Over the same five-year period, one in six men had been subjected to the same conduct.[2]

6. Complaints of this kind are made predominately by women: Nearly 8 in 10 complaints (78.4%) were made by women.[3] However, male complainants represented nearly six percent of cases (5.7%) and instances of males harassing male colleagues occurred at a rate of more than 1 in 10.[4]

Purported indicators of bullying[5]

7. Workplace bullying is defined under the *Fair Work Act 2009* as repeated and unreasonable behaviour directed towards a worker or a group of workers which creates a risk to health and safety.[6] Unreasonable behaviour does not include reasonable management action carried out in a reasonable way.[7]

8. According to the Productivity Commission the economic cost of workplace bullying is estimated at up to $36 billion annually in Australia.[8]

9. Bullying encompasses psychological acts (e.g., humiliation), physical acts (e.g., violence) or indirect behaviours (e.g., social exclusion), all of which place the target in a state of fear and inferiority.[9]

10. Nearly 1 in 10 people report being bullied at work. This is an increase from 7% reported in 2009-11.[10]

11. Of those who report that they are subject to bullying, nearly one in three report being bullied once per week.[11] More than one third (38.6%) have been bullied for between one and six months,[12] and in 62.3% of cases, the bully was a supervisor.[13] These figures are telling when they are assessed alongside the cases that come to fruition.

12. Recent research has demonstrated that women are more likely than men to claim they have been bullied and experienced unwanted sexual advances, unfair treatment because of their gender, and experience being physically assaulted or threatened by a client or

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[2] Australian Human Rights Commission, *Working without fear: results of the sexual harassment national telephone survey* (2012), 8 <https://www.humanrights.gov.au/sites/default/files/content/sexualharassment/survey/SHSR_2012 Web Version Final.pdf>.
[3] Paula McDonald and Sara Charlesworth, 'Workplace sexual harassment at the margins' (2006) 30(1) *Work, Employment and Society* 118, 123.
[4] Ibid.
[5] Fair Work Commission, *Annual Report 2015-2016*, 62 <https://www.fwc.gov.au/documents/documents/annual_reports/ar2016/fwc-annual-report-2015-16.pdf>.
[6] *Fair Work Act 2009* (Cth) s 789FD(1).
[7] *Fair Work Act 2009* (Cth) s 789FD(2).
[8] Productivity Commission, *Performance Benchmarking of Australian Business Regulation: Occupational Health & Safety* (2010), 279 <http://www.pc.gov.au/inquiries/completed/regulation-benchmarking-ohs/report/ohs-report.pdf>.
[9] Rachael Potter, Maureen Dollard and Michelle Tuckey, *Bullying & Harassment in Australian Workplace: Results from the Australian Workplace Barometer Project 2014-2015* (November 2016) Safe Work Australia, 5 <http://www.safeworkaustralia.gov.au/sites/SWA/about/Publications/Documents/985/bullying-and-harassment-in-australian-workplaces-australian-workplace-barometer-results.pdf>.
[10] Ibid 6.
[11] Ibid 3.
[12] Ibid 6.
[13] Ibid 21.

patient.[14] Men are significantly more likely to experience being sworn at or yelled at in the workplace.[15]

13. Several industries exhibit higher levels of bullying claims above the national average. These include Electricity, gas and water supply; Health and community services; Government administration and Defence; Transport and storage; Mining; and Education.[16]

14. In 2011, Australia recorded the 6th highest prevalence of workplace bullying when compared with the European Conditions Survey 2010 data from 34 European countries.[17]

15. Analysis of statistical data accumulated since the Fair Work Commission's anti-bullying jurisdiction commenced on 1 January, 2014 shows that the number of applications and outcomes of bullying complaints has been consistent.

Bullying Application Statistics

	2013-14 (1 Jan-30 Jun)	**2014-15**	**2015-16**
No. of applications	343	694	734
No. finalised with a decision	21 (6%)	60 (9%)	52 (7%)
No. of applications withdrawn prior to proceedings	93 (27%)	307 (44%)	352 (48%)
Resolved during proceedings	63 (18%)	191 (28%)	191 (26%)
Withdrawn after conference/hearing & before decision	20 (6%)	118 (17%)	110 (15%)
Applications granted	1	1	7

16. As can be seen above nearly half of applications (48%) are withdrawn early and prior to proceedings. According to the FWC, factors which may influence this outcome include identifying jurisdictional barriers to the application, the preventative focus of potential orders and a decision to pursue an alternative means of resolution.[18] Common outcomes have included undertakings with regards to future behaviour, the establishment or review of anti-bullying policies and the provision of additional training to workers.[19]

[14] Ibid 29.
[15] Ibid.
[16] Ibid 24.
[17] Ibid 6.
[18] Ibid.
[19] Fair Work Commission, *Annual Report 2014-2015*, 106 <https://www.fwc.gov.au/documents/documents/annual_reports/ar2015/fwc-ar-2015-web.pdf>.

17. Notably, very few applications have been granted since the Commission assumed jurisdiction. An order may only be made where there is a risk that the bullying behaviour experienced by the Applicant could continue (See section 789FF). Further, the Commission cannot order any monetary compensation for the bullying victim.

18. A review of the recent bullying cases reveal:

    (a) There appears to be a liberal sprinkling of the label "bullying" by Australian employees which encompass a wide range of conduct which is not unlawful;

    (b) The majority of claims do not become full-blown;

    (c) Of those that are ultimately ventilated in Court, they play out in three main ways:

        (i) claims that the alleged bullying offends the FW Act and bullying orders are sought;

        (ii) claims that the alleged bullying is adverse action; and

        (iii) claims that the alleged bullying is a breach of contract and/or a breach of an implied tortious duty of care.[20]

    (d) Of these potential courses of action, the majority of bullying claims before the FWC do not lead to arbitrated outcomes, the majority of adverse action claims (alleging bullying) are not ultimately successful and there have been a small number of successful cases in negligence in QLD, NSW and Victoria; and

    (e) The claims reveal employees hold misguided perceptions of their relative position within the work/wage bargain including beliefs that their work performance cannot be criticised by their superiors otherwise they are being 'bullied' and beliefs that they are "bullied" or "harassed" when they are asked to do things (properly characterised as reasonable and lawful directions) which they disagree with or choose not to comply with.

19. The recent decision of the FWC in *Kirkman v DP World Melbourne Ltd* [2017] FWC 5 reveals a predictable pattern emerging in bullying matters. A person who is the subject of bullying order is then subsequently dismissed and then brings unfair dismissal proceedings.[21]

20. Mr Kirkman made an application for relief from unfair dismissal under s 394 FWA 2009. He was dismissed from employment on 9 December 2014 after 28 years of

[20] See *Pateras v State of Victoria* [2017] VSC 31; *Wearne v State of Victoria* [2017] VSC 25. See also *Hayes & Ors v State of Queensland* [2016] QCA 191; *Eaton v TriCare (Country) Pty Ltd* [2016] QCA 139; *Keegan v Sussan Corporation (Aust.) Pty Ltd* [2014] QSC 64.
[21] *Maritime Union of Australia v DP World Melbourne Ltd* [2014] FCA 134.

employment with DP World (in its various incarnations) for conduct which breached the stevedoring company's harassment, bullying and freedom of association policies. DP World also asserted that the behaviour violated its code of conduct, Mr Kirkman's contract of employment and OHS responsibilities, and the enterprise agreement.

21. Part of the relevant background was that in 2014 Ms Coombe (the subject of Mr Kirkman's alleged bullying) and other employees had brought proceedings for anti-bullying orders in 2014.[22] No evidence was led to rebut the allegations and the Commission made anti-bullying orders.

22. The Commissioner found that Mr Kirkman had breached DP World's Policies.

23. As part of the Commission's consideration of what "bullying" meant within the meaning of the Policy, the Commission found amongst other things that:

    (a) it did not have to be conduct that was "directed" at a person - A "campaign of whispers about a person never directly put to that person may easily come within the rubric of bullying. The identifier of bullying is that it is repeated, it is unreasonable and it may cause harm to the person" (at [73]).

    (b) 'intimidation does not have to manifest itself in raised voices or physical threats', at [83].

    (c) 'to the extent that Mr Kirkman put Ms Coombe's health and safety at risk by his conduct toward her…he did breach his responsibilities with respect to workplace health and safety', at [95].

    (d) there was "culture of silence" in the workplace: at [124].

24. The recent decision of *Brown v Park Beach Bowling Club Limited & Ors* [2017] FWC 896 illustrates one of the main misperceptions by applicants of what "bullying" constitutes – an employer is able to require that an employee to work as directed.

25. In *Brown,* the FWC rejected Brown's bid for anti-bullying orders. Brown was a casual employee of Park Beach Bowling Club Limited and alleged that she had been bullied under s 789FD of the FW Act. Ms Brown contended the club failed to conduct a fair investigation into complaints that she had made fun of a co-worker in late 2015. The Commission held that the '*decision by the Club to issue a written warning to Ms Brown in October 2016 for the incident involving Mr Patricks about 12 months earlier lacked an evident and intelligible justification and was unreasonable'*: at [93]. However, by reason of the other allegations failing, the Commission found that there was not any repetition of this behaviour such that the conduct was not "bullying" conduct within the meaning of the Act. Given the absence of such a finding, then the Commission did not have power to order a retraction of the warning.

[22] *Application by Bowker* [2014] FWCFB 9227.

26. Of particular note is the Commissioner's consideration of the "core issue" in dispute between the parties namely that Ms Brown was of the view that she had a *right* to disobey an instruction from a supervisor or manager if she believed it to be unreasonable, such a notion was completely misguided.[23] Consider also the recent decisions of *Laviano v Fair Work Ombudsman* [2017] FCCA 197 and *Mikulic v Ecolab Pty Ltd* [2017] FCCA 146 in this context.

Adverse Action

27. Adverse actions can include dismissing a person, not giving a person his or her legal entitlements, changing a person's job to his or her disadvantage, treating a person differently than others, not hiring a person, offering a person different (and unfair) terms and conditions, compared to other employees.

28. A person who believes he or she has been dismissed in contravention of the general protections provisions may apply within 21 days of the dismissal taking effect to the Commission to deal with the dispute under s 365 of the FW Act: Section 366.

29. The Commission must then deal with the dispute by mediation or conciliation, or by making a recommendation or expressing a view, in private conference. If resolution is unsuccessful the Commission will issue a certificate to this effect. The applicant may then apply, within 14 days, to the Federal Court of Australia or the Federal Circuit Court of Australia to have the matter determined: See section 370.

FWC Adverse Action Statistics – General Protections Involving Dismissal[24]

s.365 matters	2013-14	2014-15	2015-16
No. of applications	2879	3382	3270
No. finalised	2778	3475	3060
Certificate issued	967	1073	755
Without certificate	1811	2402	2305

NB – No. finalised includes applications lodged in previous financial year.

[23] *Brown v Park Beach Bowling Club Limited & Ors* [2017] FWC 896 at [65].
[24] Fair Work Commission, *Annual Report 2015-2016*, 47-50 https://www.fwc.gov.au/about-us/reports-publications/annual-reports.

FWC Outcomes of Applications Involving Dismissal – 2015-2016[25]

Stage of Proceeding	Number	Percentage of total
No. of applications	3060	100% - rounded
Withdrawn prior to or after a conference or hearing to deal with extension of time	30 (6%)	<1%
Extension of time refused	99	3%
Application dismissed	29	<1%
Dispute resolved at conciliation	1631	53%
Withdrawn after conciliation	83	3%
Dispute not resolved: certificate issued	755	25%

30. The statistical analysis of the FWC's experience of adverse action matters reveals that the majority of matters involving dismissal are resolved at conciliation. Experience tells us that the majority of matters which proceed to the Federal or Circuit Courts are ultimately resolved at mediation prior to hearing.

31. For those matters which settled before the FWC, 63% included a monetary payment. One in six settlements (63%) were for amounts less than $6000 and eight in ten for amounts less than $15,000 (82%).[26] Less than one percent of applications were dismissed. However, 13 claims involving dismissal settled for more than $100,000 with 49 settling for more than $50,000.[27]

32. Very few disputes (2.4%) for which a certificate was issued resulted in the parties opting for their matter to be arbitrated before the FWC. This continues the extremely low adoption rate of previous years (2014-15 – 1.5%; 2013-14 – 0.8%).[28]

[25] Ibid 51.
[26] Ibid 52.
[27] Ibid.
[28] Ibid 52.

FWC General Protections Disputes Not Involving Dismissal[29]

s.372 matters	2011-12	2012-13	2013-14	2014-15	2015-16
No. of applications	598	555	779	879	859

33. Until 2015-16, the number of general protections applications not involving dismissal had been trending upwards. These were conciliated by Commission Members. Ninety percent of applications resolved within 54 days of lodgement.[30]

FWC Unlawful Termination Disputes[31]

s.773 matters	2011-12	2012-13	2013-14	2014-15	2015-16
No. of applications	141	128	130	114	81
Certificate issued	?	19	9	15	10
Without certificate	?	113	119	105	72

34. These statistics and an analysis of the adverse claims made and ultimately ventilated reveal **first** the majority resolve at the FWC conciliation stage or in mediation before the Federal or Federal Circuit Court.

35. **Secondly**, contrary to expectation, the fact that the employer holds the reverse onus of disproving the allegation (see section 361 of the FW Act) has not led to these cases being easier for employees to prove.

36. The principles by which a Court determines whether an employer took adverse action "because of" a proscribed reason, whether within the meaning of sections 340 or 351 of the FW Act, are usefully summarised by her Honour, Perry J, in *RailPro Services Pty Ltd v Flavel* [2015] FCA 504 at [80]-[87]:

    (i) The central question is "why was the adverse action taken?", which follows from the use of the word "because" in (relevantly) sections 340(1) and 351;

    (ii) This is a question of fact which requires consideration of the decision-maker's "particular reason" for taking the adverse action by

[29] Ibid 53-4.
[30] Ibid 54.
[31] Ibid.

reason of section 361 of the FW Act – the question therefore focuses upon the actual reason or reasons which motivated the decision-maker and not upon subconscious reasons or motivations (at [82]);

(iii) Direct evidence of the decision-maker as to her or his reasons is relevant, and in general necessary, to discharge the statutory presumption. Whether the presumption is discharged will turn upon an assessment of all the facts and circumstances and available inferences. However, this is not a task to identify *objectively* ascertained reasons – this would be misleading and risk the Court substituting its own view, rather than making a finding as to the *true* reason of the decision-maker (at [83]);

(iv) Whilst the proscribed reason need not be the sole reason, it must be "a substantial and operative factor" in the employer's reasons for the adverse action (at [85]-[86]); and

(v) The employer is not required to prove that the reasons for the adverse action were "entirely dissociated" from the prohibited reason in order to discharge the onus of proof. Of significance to this case, her Honour stated, at [87], "it must follow that it is a mistake to reason that, if the adverse action was connected to a disability or illness, it must be taken to be a reason for the adverse action".

37. **Thirdly**, contrary to popular belief, notions of "indirect discrimination" should not be incorporated into section 351 of the FW Act. Whilst the law remains unsettled on this front, the argument against the importation of this notion is persuasive for a number of reasons: First, the language of s 351(1) makes clear that the adverse action (the dismissal) must be 'because of' the person's disability. The words 'because of' necessarily imply a causal nexus between the decision to dismiss the employee and the prescribed reason. There is no suggestion in the legislation that an indirect connection between the decision and the prescribed reason will, or can, provide the required nexus. For example, there is no suggestion that an 'unconscious' reason would be sufficient to engage the section.

38. Related to the above, the reasoning of the High Court in respect of s 346 of the FW Act, as set out in *Board of Bendigo Regional Institute of Technology and Further Education v Barclay* (2012) 248 CLR 500, should also apply to s 351 (and has been found to apply): *Railpro* per Perry J at [82]. In *Barclay* the Court held that in assessing whether

action was taken under s 346 'because' of a prohibited reason, neither a subjective nor objective test was appropriate,[32] rather direct evidence of the decision maker as to state of mind, intent or purpose was relevant.[33] The Court held that it was wrong to inquire into the 'unconscious' state of mind of the decision maker.[34]

39. Applying the test in *Barclay* and as endorsed in *Railpro* (in the section 351 context) necessarily precludes the incorporation of concepts of indirect discrimination into s 351 as that section also requires there to be a conscious decision linking the adverse action with the relevant characteristic.

40. Lastly, the importance of limiting the assessment to 'conscious' decisions is particularly clear in circumstances where s 351 is a pecuniary penalty provision. Where a serious penalty applies there must be a high degree of certainty that a contravention has occurred. There must be clear evidence that the impugned decision was actually taken 'because of' a relevant characteristic, and not just a suggestion that the reason was potentially (unconsciously) because of that characteristic or because a requirement happened to have an adverse impact on one individual that it would not have had on others.

41. **Fourthly**, in the same way as with bullying cases the claims reveal employees hold misguided perceptions of their relative position within the work/wage bargain including beliefs that their work performance cannot be criticised by their superiors otherwise they are being 'bullied' and beliefs that they are "bullied" or "harassed" when they are asked to do things (properly characterised as reasonable and lawful directions) which they disagree with or choose not to comply with: *Laviano v Fair Work Ombudsman* [2017] FCCA 197 and *Mikulic v Ecolab Pty Ltd* [2017] FCCA 146 in this context.

Racial Vilification

42. Obviously the issue of racial vilification has been extremely topical in the recent past. Debates have raged in the Nation's newspapers and with politicians as to whether s 18C of the *Racial Discrimination Act 1975* (Cth) has gone too far in kerbing the rights of individuals to express themselves.

[32] At [46]-[58]; [126], [129] and [149].
[33] At [44]-[45].
[34] At [54], [124], [134] and [144]-[147].

43. **First**, we will consider the extent of the protection under s 18C. Section 18C provides:

> **Offensive behaviour because of race, colour or national or ethnic origin**
>
> (1) It is unlawful for a person to do an act, otherwise than in private, if:
>
> (a) the act is reasonably likely, in all the circumstances, to offend, insult, humiliate or intimidate another person or a group of people; and
>
> (b) the act is done because of the race, colour or national or ethnic origin of the other person or of some or all of the people in the group.
>
> Note: Subsection (1) makes certain acts unlawful. Section 46P of the *Australian Human Rights Commission Act 1986* allows people to make complaints to the Australian Human Rights Commission about unlawful acts. However, an unlawful act is not necessarily a criminal offence. Section 26 says that this Act does not make it an offence to do an act that is unlawful because of this Part, unless Part IV expressly says that the act is an offence.
>
> (2) For the purposes of subsection (1), an act is taken not to be done in private if it:
>
> (a) causes words, sounds, images or writing to be communicated to the public; or
>
> (b) is done in a public place; or
>
> (c) is done in the sight or hearing of people who are in a public place.
>
> (3) In this section:
>
> ***"public place "*** includes any place to which the public have access as of right or by invitation, whether express or implied and whether or not a charge is made for admission to the place.

44. **Second**, we will consider the extent to which complaints are made under this section. In 2015-16, the AHRC received 77 complaints under s 18C of the *Racial Discrimination Act 1975* (Cth).[35] Of these, 32% occurred in an employment context.[36]

45. More than half of all racial vilification complaints were resolved at conciliation.[37] Approximately 12% of complaints were withdrawn and only one complaint of racial hatred proceeded to court.[38]

46. **Third**, we will consider the recent decision of *Prior v Queensland University of Technology & Ors* [2016] FCCA 2853 and whether in fact it is illustrative of a problem with the jurisdiction. In this case, Ms Prior, and Administration officer at the University brought a racial vilification claim against three students for Facebook comments posted

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[35] Australian Human Rights Commission, *Complaint Statistics 2015-2016* https://www.humanrights.gov.au/our-work/commission-general/publications/annual-report-2015-2016
[36] Ibid.
[37] Australian Human Rights Commission, *Rate Hate and the RDA*, 2 http://www.humanrights.gov.au/sites/default/files/AHRC_RDA_Explainer_2016.pdf.
[38] Ibid.

shortly after she asked QUT student, Alex Wood, to leave an indigenous student only computer lab in 2013. She sought almost $250,000 in damages.

47. Ms Prior contended that she was vilified by the posts which left her with psychiatric injury. Two respondents (Mr Wood and Mr Powell) brought interlocutory proceedings for Ms Prior's application to be dismissed on the basis, amongst other things, that her application had no reasonable prospects of success.

48. Two of the respondents succeeded on the basis that their posts were not made 'because of' Ms Prior's race and that the posts were not reasonably likely to offend, insult, humiliate or intimidate.[39] The FCCA said that s 18C did not extend to 'mere slights' but necessitates 'profound and serious effects'.[40] Further, "tasteless jokes, or smart Alec remarks" do not fall within the scope of s 18C unless there is a likelihood that they will in the all the circumstances either offend, insult, humiliate or intimidate the members of the relevant group.[41]

49. **Fourth,** we will consider the recent amendments to the *Australian Human Rights Commission Act 1986* (Cth) (AHRC) as a result of the *Human Rights Legislation Amendment Act 2017* (Cth).

Rights and obligations of lawyers as employers to prevent discrimination, bullying and harassment

50. Lastly in this seminar, we will consider the obligations of solicitors to their employees within their own firms and to others in the profession and discuss how these issues play out in their own professional deals and their impact on the profession.

Causative factors

51. The most effective cure is prevention.

52. Actual or perceived bullying and discrimination (in the form of harassment) invariably arise from a number of causes including:

    (a) breakdowns in trust and communication;

    (b) cultures of inappropriate behaviour;

    (c) changes in management styles and approaches;

    (d) limited staff and resources; and

    (e) performance management.

[39] *Prior v Queensland University of Technology & Ors* [2016] FCCA 2853 at [58], [71].
[40] Ibid [57].
[41] Ibid [66].

Preventative mechanisms

53. The discussion below is by no means exhaustive.

54. One of the most effective ways to tackle this issue is for partners and leaders in the profession to truly embrace (and be seen to do so) a culture which is free from bullying and harassment and the way that they can do this is by:

    (a) observing and acting on the behaviour of their peers;

    (b) being involved in the creation and implementation of these policies, knowing them and applying them;

    (c) being alive to the behavioural "creep", knowing how to recognise it and through effective management stop it; and

    (d) ensuring that there is good robust relationship between the human resources department and management on this issue and within the peer group within the profession.

55. Having in place up-to-date appropriate policies that reflect the state of the law go a long way to guiding management and employees dealing with these issues. In particular, ensuring that policies are not too lengthy or arising from outdated templates which give conflicted messages or no clear message at all.

56. A critical review of standard grievance procedures and whether it works for your firm is a good idea. This includes consideration of the rigidity of the process, the length of time it will take to complete and the options available to the parties.

57. It is worth considering whether any early informal intervention with an external mediator might in fact be the best option.

58. Finally, it is worth considering in this seminar the fact that allegations of bullying and harassment arise from breakdowns in professional and personal relationships and where proper performance management has not occurred or is misperceived as being bullying or harassment.

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