

Gender Based Violence Prevention and Response Policy

Sydney Institute of Business Technology Pty Ltd (SIBT)

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Document

Document Name	Gender Based Violence Prevention and Response Policy
Brief Description	This document sets out the Sydney Institute of Business and Technology (SIBT) policy on preventing and responding to sexual misconduct, including sexual harassment or assault and gender-based harassment or violence.
Responsible Officers	SIBT General Manager
Endorsing Committee	Safer Community Campus Committee
Approving Authority	Senior Management Team
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10/09/2026	1	Initial Release	Senior Management Team

Related Documents

Name	Location
Child Protection Policy	SIBT Website
Critical Incident Policy and Procedure	SIBT Website
Discrimination, Harassment, Victimisation and Bullying Policy	SIBT Website
Immediate Incident Escalation and Reporting Policy	Policy Hub
Mental Health and Wellbeing Management and Response Policy	SIBT Website
Privacy Centre	SIBT Website
Risk Management Plan	SIBT Intranet
Risk Management Policy	SIBT Website
Staff Code of Conduct	SIBT Website
Staff-Student Relationships Policy	Policy Hub

Name	Location
Student Code of Conduct	SIBT Website
Student Complaints and Appeals Policy	SIBT Website
Sexual Misconduct GBV Procedure - Students	SIBT Website
Sexual Misconduct GBV Procedure - Staff	SIBT Website
Values in Action Code of Conduct	SIBT Website
Age Discrimination Act 2004	https://www.legislation.gov.au/
Anti-Discrimination Act 1977 (NSW)	https://legislation.nsw.gov.au/
Australian Human Rights Commission Act 1986	https://www.legislation.gov.au/
Children and Young Persons (Care and Protection) Act 1998	https://legislation.nsw.gov.au/
Crimes Act 1900	https://legislation.nsw.gov.au/
Disability Discrimination Act 1992	https://www.legislation.gov.au/
Fair Work Act 2009	https://www.legislation.gov.au/
NSW Child Protection (Working with Children) Act 2012	https://legislation.nsw.gov.au/
Racial Discrimination Act 1975	https://www.legislation.gov.au/
Sex Discrimination Act 1984	https://www.legislation.gov.au/
Treasury Laws Amendment (Enhancing Whistleblower Protections) Act 2019	https://www.legislation.gov.au/
Workplace Gender Equality Act 2012	https://www.legislation.gov.au/
Universities Accord (National Higher Education Code to Prevent and Respond to Gender-based Violence) Act 2025	https://www.legislation.gov.au/
The National Code of Practice for Providers of Education and Training to Overseas Students 2018	https://www.legislation.gov.au/
Higher Education Support Act 2003	https://www.legislation.gov.au/
Higher Education Standards Framework (Threshold Standards) 2021	https://www.legislation.gov.au/

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1. Purpose

- a) This Policy sets out Sydney Institute of Business and Technology's (SIBT) approach to preventing and responding to sexual misconduct, including sexual harassment or assault and gender-based harassment or violence.
- b) SIBT strives to:
 - i. Provide a safe working and study environment, which is respectful and free from sexual harassment;
 - ii. Encourage fair and equitable treatment of all staff and students ensuring everyone is treated with courtesy, dignity and respect; and
 - iii. Ensure that staff and students have redress against sexual harassment in the work and study environment.
- c) It sets out the legal responsibilities and obligations of employees and students of SIBT in relation to sexual harassment and relevant laws.
- d) It is the intention of this Policy to ensure that SIBT takes all reasonable measures to eliminate sexual harassment on its campus.

2. Definitions

Term	Meaning
Amnesty	An arrangement under which disciplinary action will not be taken against a discloser for Code of Conduct violations specified in this Policy. The purpose of the amnesty is to encourage disclosures and formal reports of gender-based violence and support the safety and wellbeing of those involved.
Bystander	A person who witnesses, observes, becomes aware of, or receives information about an incident of sexual misconduct involving others.
Consent	All sexual activity must be underpinned by affirmative consent between the participants involved in the activity. Sexual consent is a free, voluntary and informed agreement to participate in a sexual act, given by a person capable of giving consent. This agreement is only present when these people mutually and genuinely feel they want to engage in that sexual act and actively make sure their partner does too. Due to an inherent power imbalance and lack of capacity to appropriately infer consent, SIBT prohibits all staff members pursuing or engaging in close personal or intimate relationships with students for whom they have responsibility as outlined in the Navitas Staff-Student Relationships Policy .
Discloser	A person who provides information about an experience of sexual misconduct or submits a formal report of sexual misconduct. A discloser may be a person who has experienced sexual misconduct or a bystander.
First Responder	A person who provides support first and is confided in by a person who has experienced or is currently experiencing adverse effects of an incident.
Gender-Based Violence (GBV)	Any form of physical or non-physical violence, harassment, abuse or threats based on gender, that result in, or is likely to result in harm, coercion, control, fear or deprivation of liberty or autonomy.
Higher-risk Group	A group of people identified through research, evidence or experience as being at an increased risk of experiencing sexual misconduct, harassment or gender-based violence due to factors such as age, gender, disability, cultural

Term	Meaning
	background, sexual orientation, gender identity, power imbalances or other forms of vulnerability.
Non-disclosure Agreement	An agreement that restricts a person from disclosing information about an incident, complaint, report, investigation or outcome to other people.
Non-disparagement Agreement	An agreement that restricts a person from making statements that may criticise, complain about, or negatively describe another person, organisation, incident, complaint, report, investigation or outcome.
Person-centred	An approach that puts the person at the centre of the process, respects their needs and preferences, and supports them to make their own informed decisions whenever possible.
Rebuttable presumption	An assumption that applies unless there is evidence that it should not apply in the particular circumstances.
Respondent	Person responding to an allegation of sexual misconduct.
Sexual harassment	When a person makes an unwelcome sexual advance, an unwelcome request for sexual favours, or engages in other unwelcome or non-consensual conduct of a sexual nature in relation to another person. This occurs in circumstances where a reasonable person, having regard to all the circumstances, would have anticipated the possibility that the person harassed would be offended, humiliated or intimidated by the conduct. Sexual harassment can be subtle and implicit rather than explicit.
Sexual misconduct	Includes any of the following: • rape • sexual assault • sexual exploitation • sexual harassment • stalking • indecent exposure • voyeurism • the recording and distribution of an intimate image without the consent of the individual depicted in the image • gender-based harassment or violence • an attempt to commit an act of sexual misconduct or a threat to commit an act of sexual misconduct.
Trauma-Informed Approach	Practices that recognise the impacts of trauma, prioritise safety and choice, and avoid re-traumatisation.

3. Application

- a) This Policy applies to every staff member, student, client, customer and contractor when they are engaged in SIBT related activity or at an SIBT campus and is applicable to all SIBT operations.

4. Policy Statement

- a) SIBT is committed to providing a safe, inclusive and respectful environment for all members of its community, and to respond to reports of sexual misconduct in a person-centred, trauma-informed and procedurally fair way. Acts of sexual misconduct, harassment and assault, including gender-based harassment or violence, are always unacceptable and will not be tolerated.
- b) SIBT acknowledges that inequality and power imbalance provide the underlying conditions for sexual misconduct and recognises that sexual misconduct is disproportionately experienced by women and persons from vulnerable or higher-risk groups.
- c) SIBT will:
 - i. Prioritise safety and support in its actions to prevent and respond to sexual misconduct;
 - ii. Ensure that all of its learning and work environments are safe for all members of the SIBT community, including staff members, students, contractors and visitors;
 - iii. Establish a consistent understanding of sexual misconduct, sexual harassment, and associated terms;
 - iv. Prohibit and prevent sexual misconduct by members of the SIBT community, including staff members, students, contractors, and visitors;
 - v. Establish expected behaviours for all persons when they are engaged in SIBT related activities or on an SIBT campus;
 - vi. Provide mandatory induction and ongoing training for all staff members and students in relation to preventing and responding to sexual misconduct and monitoring, and ensure staff and students complete that training;
 - vii. Protect the safety and welfare of students and staff members by disclosing or reporting sexual misconduct;
 - viii. Set out clear processes for reporting or making disclosures about sexual misconduct for students and for staff;
 - ix. Set out clear person-centred and trauma-informed processes for responding to, and investigating, disclosures about and reports of sexual misconduct, including:
 - Providing appropriate avenues to raise a disclosure or formal report;
 - Establishing processes for determining how reports of sexual misconduct are investigated and ensuring appropriate persons conduct the investigation;
 - Providing access and contact information for support services to students and staff members who have experienced or witnessed sexual misconduct;
 - Providing appropriate support to the respondent;
 - Applying disciplinary action in the event of adverse findings, and advising relevant parties of investigation outcomes;
 - Providing and communicating appeals processes for persons involved in a report of sexual misconduct.
 - x. Support disclosers in reporting the matter to the police or the relevant law enforcement agency or regulatory body where appropriate;
 - xi. Encourage safe and active bystander intervention;

- xii. Provide amnesty from [Code of Conduct](#) violations for disclosers who were drinking and/or using drugs at the time of a reported sexual misconduct;
- xiii. Reinforce SIBT's policy on the prohibition of intimate relationships between staff members and students for whom they have responsibility outlined in Navitas' [Staff-Students Relationship Policy](#);
- xiv. Prevent the use of non-disclosure agreements or non-disparagement agreements in matters relating to sexual misconduct that would prevent the person who experienced the misconduct disclosing details of it or seeking support;
- xv. Protect the principles of freedom of speech within the context of delivering higher education services and participating in academic endeavours;
- xvi. Reinforce the requirements for immediate internal escalation and reporting of sexual misconduct to SIBT Senior Management Team and Board of Directors outlined in Navitas' [Immediate Incident Escalation and Reporting Policy](#); and
- xvii. Continuously improve its approach to working to prevent and respond to sexual misconduct including through conducting post-incident reviews where appropriate.

5. Risk Management and Specific Jurisdictional Requirements

- a) SIBT is committed to ensuring that risks associated with sexual misconduct are appropriately identified and managed at all its operations and workplaces. Gender-based violence associated risks are mitigated and monitored through the [Risk Management Policy](#) and Risk Management Plan.
- b) SIBT will comply with all applicable Commonwealth, State and Territory legislation, regulations, standards and regulatory requirements relating to gender-based violence, sexual misconduct, safeguarding, discrimination, work health and safety, and child safety. Refer to *Related Documents* section.

6. Induction and Training

- a) SIBT recognises that education, awareness, and capability building are essential to preventing and responding to sexual misconduct. To support this, SIBT is committed to:
 - i. Providing appropriate, proactive, and periodic training on preventing and responding to sexual misconduct to all SIBT staff members and students;
 - ii. Ensuring that SIBT has and maintains a dedicated webpage on preventing and responding to sexual misconduct, with clear information about support services and reporting options available to individuals impacted by sexual misconduct, as well as resources for responding to disclosures;
 - iii. Facilitating ongoing and proactive prevention activities with an emphasis on prohibited or unwanted behaviours and the necessity for consent, response to disclosures of sexual misconduct, support options available for persons involved, and increasing awareness of bystander engagement;
 - iv. Ensuring that individuals involved in responding to reports of sexual misconduct receive and complete initial and periodic specialised training on person-centred and trauma-informed responses and support pertinent to their roles. This is to ensure they are capable of responding to, triaging, seeking

further support/escalation, reviewing, and investigating reports of sexual misconduct. Such training will include confidentiality obligations, privacy requirements, recordkeeping responsibilities, culturally safe communication practices and person-centred engagement with disclosers and respondents; and

- v. Ensuring that appropriate training and induction is provided to all staff members and students in relation to acceptable behaviours, options for raising disclosures or formal reports of sexual misconduct, and processes that will be undertaken to investigate any such reports.

7. Disclosing and Reporting Sexual Misconduct

7.1. Raising Disclosures and Formal Reports

- a) Any staff member, student or bystander who experiences or witnesses sexual misconduct is encouraged to make a disclosure or formal report of the matter to SIBT.
- b) SIBT offers multiple avenues for raising instances of sexual misconduct, including through online incident reporting systems that permit disclosures to be made anonymously and providing contact details (email, phone and in-person) for appropriately trained staff members who will act as first responders and sources of support and (where available) external support services. Disclosures and reports can be made (including anonymously) via:
 - i. SIBT's wellness, health and safety (WHS) incident reporting platform [Donesafe](#);
 - ii. Email or in person to Student Counsellors, teachers, or any staff member of SIBT.
- c) Care and consideration for the discloser's wellbeing is the primary focus of SIBT in responding to any disclosure of sexual misconduct.
- d) In considering the wellbeing of a discloser, SIBT will consider the implications for the discloser of engaging in the response process. These implications will be balanced against SIBT's obligations to address the possible misconduct and to provide a safe workplace and student environment.

7.2. Review of Disclosures and Formal Reports

- a) Reports or disclosures of sexual misconduct will be assessed by Student Counsellors and may be escalated to the SIBT General Manager to determine the appropriate response and assess whether a further investigation is required.
- b) Where a person informally discloses that an incident of sexual misconduct or harassment has occurred, SIBT staff members are expected to raise, or support the person to raise, the concern as a written disclosure unless the discloser explicitly requests them not to.
- c) Where the alleged conduct is reasonably believed to constitute a crime, SIBT staff are expected to encourage and support the discloser to report the matter to the relevant police service unless the person who has experienced sexual misconduct does not want this to occur. SIBT staff members should also advise that an anonymous report can be raised on the person's behalf and offer to assist in making the disclosure. In keeping with a trauma-informed and person-centred approach, SIBT will respect the autonomy of the discloser if they do not want a matter reported to police unless SIBT

- or its staff are required to report the matter under mandatory reporting laws or not doing so would create an immediate and real risk to the safety of others.
- d) Where the discloser does not wish to have the matter formally reported or disclosed, SIBT staff members are still expected to report the matter without disclosing the identity of those involved in accordance with SIBT's reporting systems so that relevant staff members are at least aware of the reported nature of the incident and associated risks.
 - e) All reports of sexual misconduct in any SIBT operation must be immediately internally reported (without disclosing the identity of those involved) to the SIBT Senior Management Team and Board of Directors as outlined in [Navitas' Immediate Incident Escalation and Reporting Policy](#).

7.3. Investigations

- a) SIBT must consider the views of the discloser before an investigation of a report of sexual misconduct is conducted. SIBT must inform disclosers that it may investigate a disclosure where it is necessary for the safety and wellbeing of students or staff.
- b) SIBT must first notify the discloser and then the respondent in writing if an investigation will be commenced.
- c) The person(s) appointed to conduct an investigation of a report of sexual misconduct must have appropriate training or expertise having regard to the type of sexual misconduct to be investigated, including in relation to taking a trauma-informed and person-centred approach to the investigation.
- d) All parties must be provided with the opportunity to be accompanied by a support person when they are asked about the matters that are the subject of the reported sexual misconduct.
- e) SIBT will not require a discloser or a respondent to provide physical evidence relating to any alleged incident of sexual misconduct in order to investigate it.
- f) The investigator is to determine whether an alleged matter is taken to have occurred or not, or whether an allegation is substantiated or not, based on the balance of probabilities. This means that alleged sexual misconduct will be found to have occurred where it is found to be more likely to have occurred than not, based on the available evidence.
- g) The decision on any disciplinary process to be implemented having regard to the findings of an investigation is to be made by an appropriately senior SIBT staff member or external expert who is not the same person as the investigator.
- h) Unless the discloser requests otherwise, SIBT must give written notice to the discloser of the outcome of the investigation and any disciplinary process implemented if the allegations are found to be substantiated.

7.4. Consideration of Special Arrangements to Support Disclosers

- a) Regardless of the option(s) chosen to report sexual misconduct, special arrangements (academic or otherwise) can be requested by the discloser. Special arrangements will not be a disciplinary action nor viewed as an assessment of the alleged misconduct.
- b) Possible special arrangements will be based on the needs of the discloser to support their continued involvement with the SIBT community while SIBT assesses and responds to the report.

8. Amnesty Policy for Disclosers

- a) SIBT strongly encourages individuals to report sexual misconduct to an SIBT staff member, through SIBT's official incident reporting system, or to the police.
- b) SIBT recognises that individuals who have been drinking and/or using drugs (whether such use is voluntary or involuntary) at the time that sexual misconduct occurs may be hesitant to report such incidents due to fear of potential consequences for their own conduct.
- c) A discloser acting in good faith who provides information about or submits a formal report of an incident of sexual misconduct to a SIBT staff member or law enforcement agency will not be subject to [Code of Conduct](#) action for violations of alcohol and/or drug use policies occurring at or near the time of the incident.

9. Confidentiality Requirements

- a) Ensuring confidentiality is a key principle in creating an environment and culture where people who have experienced or witnessed sexual misconduct feel safe to disclose and seek support or accommodations (academic or other). SIBT is committed to ensuring such an environment and culture exists.
- b) All members of the SIBT community who receive a disclosure of sexual misconduct, or who are involved in responding to or investigating it, must keep the matter confidential, except in accordance with the terms of this Policy and associated procedures, in order to protect the rights of those involved, prevent an unjustified invasion of their personal privacy, and preserve the integrity of any investigation process.
- c) In certain situations, SIBT may need to share information or act. This may occur where SIBT assesses that a disclosure cannot be kept confidential, including where there are welfare concerns indicating a risk of serious harm to the person concerned or another person, or where the disclosure involves a child or young person under 18 years of age and gives rise to child safety or mandatory reporting obligations. Information may also be shared for the purpose of obtaining legal or other specialist advice, or to notify insurers.
- d) Further information regarding the storage and preservation of confidential records, and the circumstances in which confidential information may need to be shared with additional staff members, external authorities, or other third parties, are outlined in the procedures adopted to implement this Policy.
- e) Confidentiality requirements will be applied only to the extent reasonably necessary to:
 - i. Protect the privacy of the persons involved;
 - ii. Ensure procedural fairness;
 - iii. Comply with legal obligations; and
 - iv. Preserve the integrity of any assessment, investigation or disciplinary process.
- f) Confidentiality requirements will not be used to prevent a person from discussing their own experience of sexual misconduct, seeking support, obtaining legal, medical or advocacy services, making a complaint to an external authority, or otherwise exercising their rights under law.

- g) Where SIBT requests that parties exercise discretion regarding a disclosure, report or investigation, any such request will be limited to what is reasonably necessary to protect the integrity of the process and the privacy of those involved. Such requests will not prevent any person from seeking support, counselling, advocacy, legal advice, medical assistance, or reporting matters to law enforcement, regulatory agencies or external complaint bodies.
- h) Access to records relating to disclosures, reports, investigations and outcomes will be restricted to authorised personnel who require access to perform their responsibilities in supporting, assessing, investigating, responding to, monitoring or reporting on the matter.

10. Support Services for People Who Experience Sexual Misconduct

- a) SIBT is committed to ensuring all persons affected by sexual misconduct, including disclosers, bystanders and respondents, are provided with information about and access to appropriate support groups and services.
- b) Contact details for emergency and ongoing support and assistance for students and staff members are to be made available and maintained by SIBT and outlined in the procedures adopted to implement this Policy.
- c) Any student who experiences gender-based violence has a right to speak about their experience, to seek appropriate support. Support may be sought through:
 - i. Student Counsellors;
 - ii. Medical practitioners;
 - iii. Lawyers;
 - iv. Advocates;
 - v. Family or trusted supports;
 - vi. The National Student Ombudsman or other external complaint bodies
 - vii. External advocacy and specialist gender-based violence support services.
- d) A person who experiences or witnesses sexual misconduct has the right to seek support, advocacy, legal advice or assistance from external agencies and may make complaints to external authorities, regulators or complaint bodies without fear of reprisal or adverse treatment by SIBT.

11. Values in Action Code of Conduct

- a) This Policy applies alongside SIBT's and Navitas' [Values in Action Code of Conduct](#), which sets out SIBT's expectations of, and requires, all staff members to:
 - i. Adhere to all SIBT policies related to preventing and addressing harassment, discrimination and sexual misconduct;
 - ii. Model respectful and professional behaviour at all times, setting positive examples for students and colleagues;
 - iii. Intervene in situations when it is safe to do so, thereby helping to prevent sexual misconduct from occurring; and
 - iv. Report any sexual misconduct they experience or become aware of through the appropriate channels.

12. Staff-Student Relationships Policy

- a) SIBT expects and requires all members of staff to behave in accordance with the [Navitas' Staff-Student Relationships Policy](#) and [SIBT Staff Code of Conduct](#) at all times. Without limiting the generality of that statement, SIBT strictly prohibits “close personal or intimate relationships” where the staff member has “responsibility for a student” or reasonably expects to have responsibility in the future.
- b) The Policy defines “responsibility for a student” broadly across a range of professional and academic spheres of control and is not limited to a student’s direct teacher or tutor. If a “close personal or intimate relationship” existed prior to enrolment, or develops during enrolment despite the prohibition, the Policy requires such relationships to be immediately reported so appropriate arrangements can be implemented.
- c) Failure to disclose such a relationship constitutes a breach of this Policy and will be investigated as misconduct in accordance with applicable staff policies and procedures and may result in disciplinary action.
- d) For further information and reporting requirements refer to the [Staff-Student Relationships Policy](#).

13. Use of Non-Disclosure Agreements or Non-Disparagement Agreements

- a) SIBT will not enter into a non-disclosure agreement, non-disparagement agreement, settlement agreement, deed or any other contractual arrangement that prevents, restricts or discourages a person who has experienced, witnessed, reported or disclosed sexual misconduct from:
 - i. Discussing their own experience;
 - ii. Seeking support, counselling, advocacy, legal or medical advice;
 - iii. Making a report or complaint to law enforcement, regulatory authorities, the National Student Ombudsman or other external bodies; or
 - iv. Participating in any process permitted by law relating to the conduct.
- b) Nothing in this Policy prevents a person from speaking about their own experience of sexual misconduct, subject to the requirements of applicable legislation and the protection of the privacy of other individuals.

14. Freedom of Speech

- a) SIBT will have particular regard to, and place significant weight on, the importance of freedom of speech within the bounds of the law, academic freedom, and tolerance for controversial views in an educational context or environment, including on premises and in situations where educational services, events, and debates take place, in accordance with the [Academic Freedom and Freedom of Speech Policy](#).
- b) SIBT will apply a rebuttable presumption that the following will generally not be considered harassment:
 - i. Reading, viewing, listening to, or using approved course materials, such as books, videos, recordings, and images.
 - ii. Hearing different views, opinions, or ideas expressed during teaching, research, or class discussions, provided they are lawful and follow SIBT's policies and expected standards of behaviour.

15. Reporting Requirements

- a) SIBT will compile de-identified reports on the number, nature and trends of reports of sexual misconduct for review by the Senior Management Team, and through annual reporting to the Academic Board and SIBT Board of Directors to ensure appropriate oversight. Where required by applicable law, SIBT will report de-identified data relating to incidents of sexual misconduct and harassment to relevant government authorities.
- b) The specific information to be collected, monitored, and reported will be set out in the procedures adopted to implement this Policy.

16. Consultation with Student Bodies

- a) SIBT will consult with students when reviewing or making substantive amendments to the associated procedures and reporting guidelines adopted to implement this Policy.

17. Responsibilities

Responsibility	BoD	GM	SC	QCM	AD	DSAS	PC	AB	DMA	ALL
Maintain currency of Policy	A	R	S	S	C	C	S	I	C	I
Prevention strategy and culture	A	R	C	S	R	R	I	C	R	I
Mandatory training and completion rates are monitored (staff and students)	I	A	C	R	R	R	R	I	R	R
Reporting incidents is timely and in line with legislative obligations	I	A	R	R	S	S	S	I	S	I
Receive disclosures and arrange special adjustments	A	R	S	S	S	S	I	S	I	
Student consultation on procedures	A	A	S	R	C	C	C	C	C	I
Decision to investigate incident or escalate to Navitas Senior Management Team	I	A/R	C	C	C	C	S	I	C	I
BoD = Board of Directors, GM = SIBT General Manager, SC = Student Counsellors, QCM = Quality & Compliance Manager, AD = Academic Director, DSAS = Director, Student & Academic Services, PC = Program Convenor, AB = Academic Board, DMA = Director, Marketing & Admissions All = Staff, R = Responsible, A = Accountable, S = Supporting, C = Consulting, I = Informed										

18. Appeals

- a) All parties involved in the disclosure or investigation will have the right to an internal appeal of any subsequent actions.
- b) The appeal will be conducted in line with the [Student Complaints and Appeals Policy](#) and/or relevant staff grievance procedures, as applicable.
- c) Involved parties may also raise concerns with appropriate enforcement or regulatory agencies external to SIBT.

19. Review

- a) This Policy is reviewed by the Responsible Officer, Endorsing Committee and the Quality and Compliance Manager every three (3) years and updated, as required, with any changes to the regulatory compliance requirements, legislation, regulation, and guidelines.
- b) This review process aims to ensure alignment to appropriate strategic direction and continued relevance to SIBT's current and planned operations.

20. Records Management

- a) All records in relation to this document will be managed as follows:

Record type	Owner	Location	Retention	Disposal
Policy	SIBT General Manager	SIBT website	Permanent	Retain permanently
Records relating to allegations	SIBT General manager	Donesafe	7-10 years	Donesafe Archive