GRIFFITH UNIVERSITY



Gender-based Violence Prevention and Response Plan 2026-2029

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Content warning

This document contains information about gender-based violence, including sexual harm, bullying, harassment and discrimination, which may be distressing. If you would like to speak to someone, you can contact the following support services:

STUDENTS

Griffith Mental Wellbeing Support Line
(24 hours, 7 days)
Phone: 1300 785 442
Text: 0488 884 146

Student Safety and Wellbeing
8.30am - 4.30pm, Monday to Friday
Phone: 07 3735 5372 or 0422 686 896
Email: studentsafetyandwellbeing@griffith.edu.au

EMPLOYEES

Workplace Wellbeing and Counselling
(24 hours, 7 days)
Phone: 1300 687 327

EXTERNAL SERVICES

1800 Respect
Phone: 1800 737 732

13YARN
Phone: 13 92 76

From the Vice Chancellor

At Griffith University, we are proud to be a values-led institution that places people and community at the centre of everything we do. Our commitment to gender equality is longstanding and deeply embedded in our culture, policies and practices.

We recognised, however, that members of the Griffith community have experienced gender-based violence in the past, and that our complaints systems, academic and personal support, and preventative strategies have not always been as appropriate or supportive as they should have been.

We also recognise that, as gender-based violence is widespread in Australian society, members of our community are likely to continue to experience some forms of gender-based violence. We have already taken significant steps to improve the response of the University in supporting victim-survivors, and we are committed to taking further steps in compliance with the new National Higher Education Code to Prevent and Respond to Gender-Based Violence.

We recognise that Griffith University, along with the whole university sector, needs to be committed to becoming national leaders in strategies to prevent gender-based violence and to ensure that reports of such violence are dealt with using trauma-informed responses. There is still much work to do in both respects.

We are committed to fostering environments for work, study, student living and campus life that are welcoming, respectful, inclusive and safe. Every member of our University community has the right to be safe, to feel safe and to be treated with dignity, fairness and respect. Our priority in responding to gender-based violence is the safety and wellbeing of those impacted, and we offer a range of supports, including counselling, leave provisions, study arrangements, security measures and clear reporting pathways.

We recognise that gender-based violence does not affect everyone equally. Different members of our community have different needs and experiences, and some populations are more vulnerable than others. Our prevention and response initiatives are increasingly informed by data, research and the voices of our students and employees. We deeply value the courage of those who share their stories to help us learn, grow and achieve better outcomes for all.

Griffith is a national leader in gender equality and violence prevention research, particularly through our Disrupting Violence Beacon and Gender Equality Research Network. Our work is aligned with the United Nations' Sustainable Development Goals, specifically SDG 3 (Good Health and Well-being), SDG 5 (Gender Equality) and SDG 10 (Reduced Inequalities). We are proud to be recognised as a Gold Tier Employer in the Australian LGBTQ+ Inclusion Awards and to have received four Cygnet Awards through the SAGE Athena Swan accreditation pathway. I recognise and thank all the colleagues and students whose hard work and commitment underpins these achievements.

Griffith's Gender-Based Violence Prevention and Response Plan reflects our ongoing commitment to addressing the factors that drive and contribute to gender-based violence through evidence-based research, education and practice. It aligns with the National Higher Education Code to Prevent and Respond to Gender-Based Violence, and we welcome this national framework as a step forward for our sector and beyond.

Professor Carolyn Evans
Vice Chancellor and President

The national context

Gender-based violence occurs at troubling rates across the Australian community, and every organisation has a role to play in eliminating the causes and effects of gendered harm. Recognising the unique role of the Higher Education sector in addressing gender-based violence, the Australian Government enacted the *Universities Accord (National Higher Education Code to Prevent and Respond to Gender-based Violence) Act 2025 (Cth)* in August 2025.

In mid-October 2025, the Minister for Education formally made the National Higher Education Code to Prevent and Respond to Gender-based Violence (National Code) a legislative instrument under the Act. The National Code will commence on 1 January 2026 for Table A providers, including Griffith University.

It outlines the standards and requirements that higher education providers must meet to ensure safe, respectful, and inclusive environments for both students and employees across study, work, social and residential settings. It mandates that institutions must actively work to prevent, reduce, and eliminate gender-based violence to the greatest extent possible, and respond effectively when it occurs, prioritising the safety, health, and wellbeing of those affected.

The evidence base

Research into gender inequality and gender-based violence in Australia reveals persistent and evolving challenges across various sectors of society. Based on responses from individuals who have participated in these surveys, the "Time for Respect" national workplace sexual harassment survey and the National Student Safety Survey have identified sexual harassment and safety concerns in workplaces and educational institutions. At the same time, broader societal patterns are reflected in the Australian Bureau of Statistics (2023) report on personal safety. Together, these sources illustrate the ongoing nature of gendered violence and inequality. A snapshot of key statistics is provided below.

Universities

- 1 in 6 Australian university students who responded to the survey experienced sexual harassment.
- 1 in 20 Australian university students who responded to the survey experienced sexual assault.
- Sexually diverse students were more likely to experience sexual harassment than heterosexual students.

Workplaces

- 1 in 3 people were sexually harassed at work in the past five years.
- 41% women and 26% men were sexually harassed at work.
- Sexually diverse (46%), people with disability (48%) and Aboriginal and Torres Strait Islander people (56%) experienced workplace sexual harassment at higher rates.

Community

- An estimated 8 million Australians have experienced physical or sexual violence since the age of 15.
- Of the above, 22% of women and 6.1% of men experienced sexual violence.
- 12.6% of women and 4.5% of men experienced sexual harassment in 2021-22.

A word on language

This document uses the term gender-based violence in alignment with requirements under the National Code. We acknowledge that the term gender-based violence refers to a broad spectrum of harmful behaviours that are rooted in systemic power imbalances and gender inequality. This includes, but is not limited to, domestic violence, family violence, intimate partner violence, sexual violence, sexual assault, and sexual harassment.

We recognise that the term family violence more accurately reflects the experiences of extended families, kinship networks, and community relationships—particularly within Aboriginal and Torres Strait Islander communities, as well as other culturally and linguistically diverse communities—where violence may occur across a range of interpersonal and familial contexts.

While evidence demonstrates that gender-based violence disproportionately affects women and girls, we affirm that people of all genders—including men, non-binary, and gender-diverse individuals—can and do experience these forms of violence. Our commitment to addressing gender-based violence is to use inclusive, respectful language that reflects the diversity of our community.

The Griffith context

As evidenced in our Strategic Plan 2025-2030, people are at the heart of Griffith. Our people engage in relationships built on mutual respect, responsibility, and accountability. Griffith students and employees move beyond transactional giving and receiving to encompass a deep sense of obligation, respect and care for people, country, ancestors and future generations. As a University, we create an inclusive and diverse community for employees, students and partners, where people know they matter and have a sense of belonging. At Griffith, we hold ourselves to the highest standards of ethical conduct and act fairly and transparently.

Griffith University's Gender-based Violence Prevention and Response Plan (the Plan) reinforces our commitment to fostering respectful communities through a coordinated strategy that engages all University functions, students, employees, leaders and other University community members. The Plan integrates data analysis, good practice, legislative requirements and policy responses to ensure progress towards an environment that proactively prevents and responds to gender-based violence, including sexual harassment.

The University is committed to responding to gender-based violence experienced by our students and staff, regardless of where it occurs, including on campus, off campus, in-person or through digital technology, or the context in which it occurs, including family and domestic violence. This commitment forms part of a whole-of-organisation approach to preventing and responding to gender-based violence, including the identification, mitigation, and response to risks and drivers, addressing gender-based inequalities and providing effective responses when harm or violence occurs.

At Griffith University, we acknowledge all victim-survivors of gender-based violence—their courage, resilience, and the strength it takes to share their stories. We're especially grateful to those who have contributed their experiences to help shape research, prevention and response initiatives at the University.

Our diverse community

Griffith University is a large and complex organisation where diverse populations, including employees, students, affiliates, partners, residents, and the general public, not only interact but also engage in a significantly broad spectrum of work types, activities, and environments. All members of the University community have the right to be treated with dignity and respect and to work, study, live and socialise in a safe environment. The University acknowledges that both drivers and potential risk areas are present within the University community, which can impact the prevalence of sexual harm and gender-based violence.

One of Griffith's strengths is the diversity of our community. We embrace diversity and inclusion to ensure our community is provided with a safe and respectful work, study, living and social environment.

Griffith recognises that particular groups in the Australian community experience disadvantage, marginalisation and unequal outcomes. Consequently, we focus on removing barriers to wellbeing, participation, progression and success in learning and work at our institution. Our commitment to equity, diversity, inclusion, and the prevention of gender-based violence is evident through a comprehensive policy suite, strategic plan, and governance structure that sets behavioural expectations to drive inclusive, cohesive, healthy, and safe communities and societies.

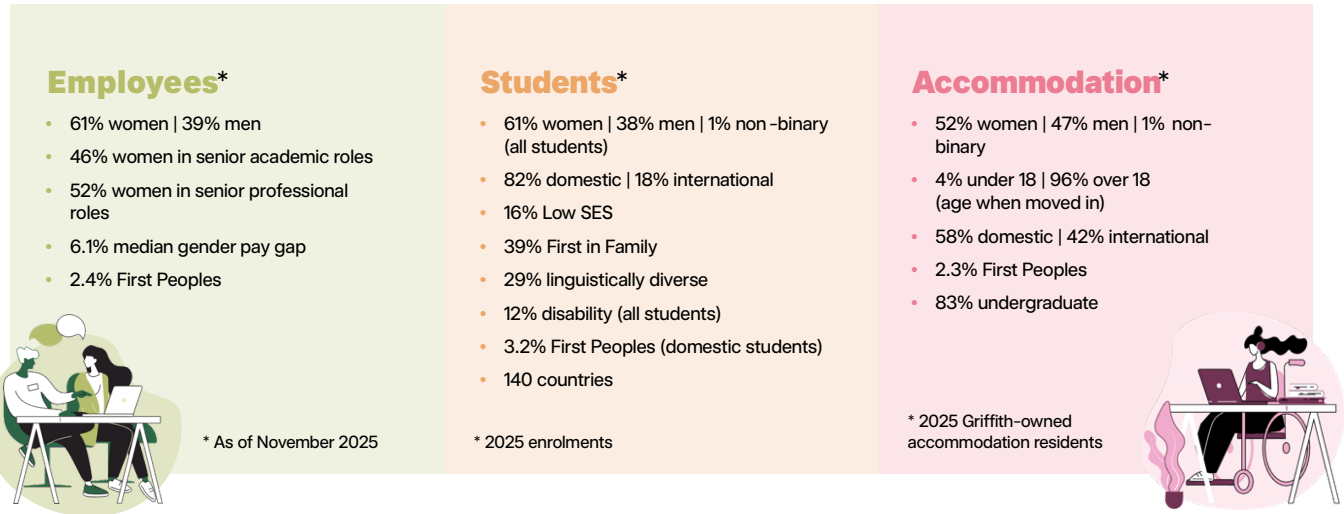


Figure 1: Griffith University community overview

Our spaces

Our University spans four physical campuses across South East Queensland, plus our Digital campus. Each campus is uniquely located, with our spaces neighbouring a mix of urban hubs, cityscapes and state forests.

Student accommodation

Griffith recognises that student accommodation presents unique gender-based violence prevention and response challenges due to communal living arrangements, concentrated social interaction, after-hours activity and the overlap of living, study and social environments. Accommodation residents include domestic and international students studying at the undergraduate and postgraduate levels, from diverse backgrounds.

Accommodation options available to Griffith students include:

- University-owned accommodation at the Brisbane South campus (468 beds)
- affiliated accommodation provided by Campus Living Villages at the Gold Coast campus (517 beds)
- affiliated accommodation provided by Rural Medical Education to assist students undertaking professional placements in regional Queensland (50 beds).
- homestay accommodation for international students under the age of 18.

Griffith is responsible for University-owned accommodation governance and oversight and works collaboratively with our affiliated accommodation providers to support compliance with the National Code and align prevention, response, reporting and support arrangements.

Our expertise

Griffith's Violence Research and Prevention Program and Disrupting Violence Beacon are at the forefront of efforts to understand and prevent domestic, family, and sexual violence. These programs explore complex issues such as intimate partner femicide, coercive control, and technology-facilitated abuse, with a strong focus on survivor-centred, trauma-informed approaches.

Griffith University is a national and global leader in research that addresses gender equity, domestic and family violence, sexual violence, and child safety. Through interdisciplinary initiatives, such as the Gender Equality Research Network (GERN) and the Sport and Gender Equity@Griffith Research Hub, Griffith scholars are advancing inclusive, feminist research that informs policy, empowers communities, and promotes leadership opportunities for women and gender-diverse people across sectors, including sport and education.

In the area of child protection, Griffith's Youth Forensic Service and criminology researchers are leading projects on child sexual abuse, adverse childhood experiences, and systemic responses to abuse and neglect. Their work informs early intervention strategies, improves disclosure processes, and supports justice and wellbeing for vulnerable children and families.

Together, these research efforts reflect Griffith's deep commitment to social justice, equity, and evidence-based solutions that foster safer and more respectful communities.

Our experts

Griffith University is home to a broad and diverse community of researchers contributing to the field of gender-based violence. The contributions of all researchers to the prevention and response of this wicked global problem are valued. This spotlight intends to highlight a select few whose work exemplifies leadership, innovation and impact across the international community and/or at Griffith University.

- **Professor Sara E Davies:** Deputy Director (Indo-Pacific Research) of the Australian Research Council Centre of Excellence for the Elimination of Violence Against Women (CEVAW). Sara is a globally recognised scholar in global health governance, gender-based violence in conflict, and the Women, Peace and Security agenda. She is also Co-chair of the Gender Equality Research Network (GERN) at Griffith University.
- **Professor Patrick O'Leary:** Internationally recognised expert in social work, gender-based violence, and child protection. Patrick is Co-Lead of the Disrupting Violence Beacon and Director of the Violence Research and Prevention Program (VRPP) at Griffith University.
- **Professor Elena Marchetti:** Professor of Law at Griffith University and Co-Lead of the Disrupting Violence Beacon. Elena is a leading scholar in Indigenous justice, gender-based violence, and intersectional legal analysis, with a strong focus on improving access to justice for Aboriginal and Torres Strait Islander peoples.
- **Professor Molly Dragiewicz:** Globally recognised criminologist and Professor of Criminology and Criminal Justice. Her work focuses on gendered violence, technology-facilitated coercive control, post-separation abuse, gender equity and feminist criminology, and children's involvement in domestic violence contexts.

- **Associate Professor Zoe Rathus AM:** Nationally recognised expert in family law, domestic and family violence, and women's legal advocacy. Zoe is an Associate Professor at Griffith Law School and a member of the University's Safe and Respectful Communities Expert Reference Group.
- **Dr Joe Liang:** Senior Lecturer in Griffith's School of Human Services and Social Work. Joe's work focuses on the psychosocial well-being of vulnerable individuals and groups across the lifespan, with a strong emphasis on inclusion, social justice, and person-centred care. Joe is a member of the University's Safe and Respectful Communities Expert Reference Group.
- **Professor Melanie Zimmer-Gembeck:** Distinguished developmental psychologist at Griffith University, primarily known for her work on coping, emotion regulation, rejection sensitivity, and the influence of social relationships. Melanie leads the Family Interaction Program (FIP) and is a member of the University's Safe and Respectful Communities Expert Reference Group.
- **Dr Jeffrey Ackerman:** Senior Lecturer in the School of Criminology and Criminal Justice and a member of the Griffith Criminology Institute. Jeffrey's research focuses on intimate partner violence (IPV), juvenile delinquency, victimisation, and technology-facilitated abuse, with a strong emphasis on gendered violence. He is a member of the University's Safe and Respectful Communities Expert Reference Group.
- **Professor Simone Fullagar:** Interdisciplinary sociologist and Chair of the Sport and Gender Equity (SAGE) research hub at Griffith University. Simone leads strategic initiatives focused on advancing gender equity in sport through research, education, and policy development.

Griffith wishes to recognise and thank the above researchers for their contributions to the background work that helped inform this plan and their ongoing contributions to the prevention and response to gender-based violence, in all its forms, in organisational and community contexts.

Planning, engagement and evidence

Engagement

Both the Queensland Work Health and Safety Regulation 2011 (WHS Regulation) and the National Code require organisations to engage their communities in developing and implementing prevention and response plans.

In 2025, the University developed a sexual harassment and gender-based violence prevention plan, aligned with work health and safety regulations. The plan was shaped through engagement with a broad range of employee and student stakeholders, as well as subject matter experts, and now forms the foundation of the University's whole-of-organisation Gender-Based Violence Prevention and Response Plan.

Further consultation has been undertaken to ensure alignment with the National Code, while recognising that additional engagement with diverse and vulnerable groups within the University community is still required. Feedback on the Gender-based Violence Prevention and Response Plan (2026-2030) is welcome and can be submitted to safecampuses@griffith.edu.au.

Engagement and consultation activities

Between March and November 2025, Griffith University undertook a range of consultation and engagement activities to inform the development and implementation of both the Sexual Harassment and Gender-based Violence Prevention Plan and the University's broader approach to implementing the National Code.

Sexual Harassment and Gender-based Violence Prevention and Response

From March to May 2025, the draft Sexual Harassment and Gender-based Violence Prevention Plan 2025 was made available to all employees through the Prevention Plan Information Hub and promoted through key Safety contacts, Griffith Staff News and other internal networks. Input was sought from a broad range of internal stakeholders, including the Tier 1 and 2 Health, Safety and Wellbeing Committees, Executive Group, Gender-based Violence Expert Reference Group, Centre of Work, Organisation and Wellbeing, Disrupting Violence Beacon, Equity, Diversity and Inclusion Committee and its subcommittees, nominated contacts from each University Element, Student Associations and Student Partnerships Program representatives.

Feedback highlighted several key themes, including the need for greater clarity regarding the scope of gender-based violence, definitions and responsibilities, stronger articulation of barriers to reporting, particularly those relating to power imbalances, complex processes and unclear reporting pathways, increased emphasis on cultural safety and intersectional experiences and clearer demonstration of leadership commitment. This feedback directly informed revisions to the Plan and supported its expansion to align with the requirements of the National Code.

Education and capability building

The University also sought feedback on its education and capability-building initiatives. Fixed-term and continuing employees, including leaders, were invited to complete a survey following the mandatory Preventing and Responding to Gender-based Violence training module. Results indicated increased employee understanding of gender-based violence and improved awareness of available supports and response options, demonstrating the effectiveness of the training in building knowledge and confidence across the workforce.

Student perspectives were gathered throughout Trimesters 1, 2 and 3 of 2025 through pre- and post-module surveys associated with the mandatory Respect at Griffith program. Students generally described Griffith as a respectful, inclusive and values-driven institution with clear behavioural expectations and a strong culture of belonging, safety and accountability. Many reported feeling welcomed, supported and valued within the University community. Some students also identified opportunities to strengthen resources and educational materials by incorporating a broader range of intersectional experiences and perspectives.

Leadership and governance bodies

Further consultation occurred through University leadership and governance forums during October and November 2025 as the National Code implementation approach and Outcomes Framework were refined. At the All Staff Town Hall in October 2025, employees raised concerns about declarations made during recruitment processes. In response, the Vice Chancellor reaffirmed Griffith University's commitment to preventing and responding to gender-based violence and confirmed the University's intention to fully comply with the National Code.

The Senior Leadership Forum also considered the proposed Outcomes Framework in October 2025, with participants expressing strong support for both the intent of the framework and its proposed features. During November 2025,

additional engagement was undertaken with the Gender-based Violence Expert Reference Group, Equity, Diversity and Inclusion Committee, Executive Group, Academic Committee and Campus Living Villages Advisory Board through presentations, governance submissions and Outcomes Framework surveys. Feedback across these groups was broadly positive and demonstrated support for the University's proposed implementation approach. While no specific feedback was received from the Campus Living Villages Advisory Board, Griffith University and Campus Living Villages committed to continuing to share information, resources and progress updates relating to gender-based violence prevention and response initiatives.

Collectively, these engagement activities have helped shape Griffith University's approach to preventing and responding to gender-based violence and will continue to inform the implementation and ongoing review of the Gender-based Violence Prevention and Response Plan 2026–2030.

Evidence

Our culture

As an educational institution, Griffith understands it can play an important role in reducing the incidence of gender-based violence through gender-based violence prevention education. Over the last two years, Griffith has introduced compulsory education programs for employees and students. Feedback from participants indicates that, upon completing this training, they have gained a deeper understanding of the issues surrounding gender-based violence, the University's expectations and strategies for addressing inappropriate behaviour, as well as the support services available to them, as illustrated in Figure 2 below.

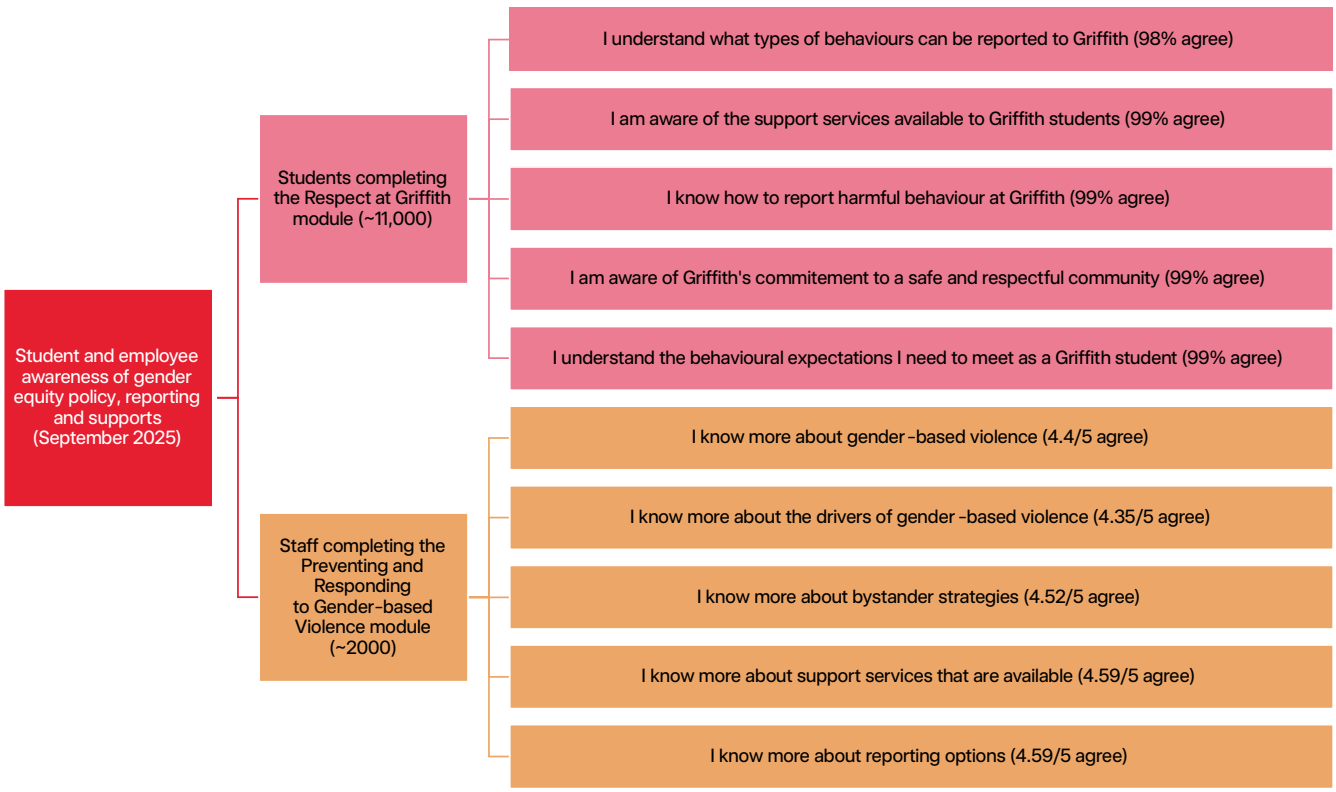


Figure 2: Overview of University reporting, support seeking and bystander behaviours

Acknowledging harm that has occurred

Despite Griffith's work in this area, incidents of gender-based violence still unfortunately occur within our community. Since 2018, Griffith has publicly published de-identified data recording disclosures and formal reports of sexual harm. During our most recent reporting period (1 September 2024 to 31 August 2025), Griffith received 41 disclosures or formal reports relating to sexual harm from students, employees and members of the public. An overview of this data is provided below.

Disclosures and formal reports relating to sexual harm

- 48.78% of respondents were Griffith students. Of the student respondents*:
    - 45.00% were undergraduate students
    - 30.00% were research students

    - 15.00% were domestic students
    - 50.00% were international students.
- 68.29% of disclosers were Griffith students. Of the student disclosers*:
    - 57.14% were undergraduate students
    - 21.43% were research students
    - 28.57% were domestic students
    - 42.86% were international students.
- 80.49% of all respondents were male.
- 70.73% of all complainants were female.
- 46.34% of reported harm occurred off campus.
- 46.34% of reported harm occurred on campus.
- 7.32% of reported harm occurred online.

* Where percentages do not equal 100%, characteristics are unknown or in too small a number to report without compromising confidentiality.

Our responses

The University encourages individuals to disclose and report incidents of gender-based violence regardless of where or the context in which they occur, including on-campus, in-person, off-campus, or through digital technology. The University acknowledges that incidents of gender-based violence fall within a continuum, which includes sexual harassment, sex- or gender-based harassment or discrimination, sexual assault and domestic and family violence. The University provides anonymous or identified reporting and disclosure options for students, employees and third parties.

An employee or student may choose to disclose or report gender-based violence using the pathways outlined in Disclosure, reporting and support pathways, which include in-person, phone, email and online options. A disclosure can be made to access support or to inform a formal report. Further, the University recognises that any member of the University community who experiences gender-based violence has the right to report to an external organisation, including the police, and the right to decide not to report.

As part of the systemic review of the University's responses to disclosures and formal reports of gender-based violence, the following areas have been identified for improvement:

- **Alignment with regulatory timelines:** Enterprise Agreement provisions are outside the National Code's 45-day timeframe for completing investigation and disciplinary processes (see Standard 5, #22).
- **Procedure alignment:** Review and appeal processes exceed the National Code's 20-day limit for finalising appeals (see Standard 5, #24).
- **Integrate complaint pathways:** Establish clearer complaint pathways and supporting processes across the University to enhance the user experience, including the stronger integration of student and employee formal report handling to effectively manage matters involving employees who are also students (see Standard 4, #14).
- **Expand investigation scope:** Current policy settings permit investigation when incidents occur on University premises, during University activities, or in connection with the University. Policies require updating to enable Griffith to investigate all formal reports in which the respondent is a student or employee, regardless of the context in which gender-based violence occurred (see Standard 5, #21).
- **Improve communication protocols:** Implement communication strategies to ensure disclosers and respondents are regularly updated through formal report processes. Competing legislative requirements need to be resolved with the intent of providing disclosers with respondent disciplinary and appeal process outcomes (see Standard 5, #23-24).
- **Deploy Integrated Care Model:** Introduce a person-centred, trauma-informed care model to provide disclosers and respondents with a centralised point of coordination for support and access to University services (see Standard 4, #15-16).
- **Governance of time extensions:** Revise disciplinary and appeal procedures to require Vice Chancellor approval for any time extensions for finalising matters (see Standard 5, #22).
- **Data collection:** Develop and implement a strategy to collect detailed demographic and characteristic data of complainants and respondents, in line with National Code requirements (see Standard 6, #25).
- **National Student Ombudsman (NSO):** The NSO published the report *Can I talk about this? The use of confidentiality requirements in University complaint handling* in March 2026. The University has reviewed the recommendations in this report and assessed opportunities to further strengthen student policy settings and develop resources to aid student understanding of confidentiality requirements and support options (see Enabling Initiatives and Action Plan Standards 1 and 2).

Identified risks, enablers/controls and barriers

The Queensland Workplace Health and Safety (WHS) Regulation requires organisations to identify key risks to the health and safety of workers from sexual harassment and sex or gender-based harassment at work, and the controls in place to manage them. The National Code requires a critical analysis of risks, enablers and barriers that are relevant to the prevention of and response to gender-based violence across the organisation.

In aligning the requirements of the National Code and Queensland WHS Regulations, the University applies a unified framework of risks, controls and barriers. The term "controls" is intentionally adopted to ensure consistency with local legislation. In this context, controls encompass both risk mitigation measures and proactive actions that support participation and enable positive outcomes.

The University undertook a whole-of-organisation assessment to identify where gender-based violence risks and potential harm could arise across the University. The assessment examined existing controls, together with organisational systems, practices and cultural factors, to determine what is working well, where gaps exist, and where barriers may limit effective prevention and response efforts.

An interdisciplinary team examined University data related to attitudes, incidents, disclosures and reports. They assessed response pathways and protocols in collaboration with operational teams, gathered evidence from related initiatives and analysed the characteristics and functions of organisational units within the University.

Specific consideration was given to student accommodation as a higher-risk setting under the National Code. This included examining student accommodation environments, governance arrangements, resident leadership, reporting pathways and support models. Potential risks, controls and barriers unique to residential settings were identified and are reflected throughout the Plan.

Findings from the whole-of-organisation assessment have informed the actions and priorities outlined in this Plan. Risks, controls and barriers are monitored through Griffith University's Safety Management System, Employee Engagement Survey, disclosure and reporting review processes, consultation activities and gender-based violence governance reporting, supporting continuous improvement actions.

Identified risks

This assessment identified the following potential risks:

1. Leadership (at all levels) is ineffective in eliminating gender-based violence.
2. Employees, students, residents, and other members of the University community do not feel safe when using physical environments on campus.
3. Employees, students, residents and other University community members lack knowledge and understanding of:
    a. expectations regarding equitable, safe, respectful and inclusive behaviours; and/or
    b. the underlying drivers and causes of gendered harassment, discrimination and abuse.
4. Unacceptable or unlawful behaviour is used by employees, students, residents or other members of the University community and there are some environments within the University that pose greater risk, including Student Accommodation.
5. Employees and students are not equipped to respond effectively to incidents or disclosures of gender-based violence.
6. Available supports aren't effective, accessible, widely known, or have the potential to cause more harm.
7. Governance relating to the management of sexual harm and gender-based violence is unclear or inconsistent, due to:
    a. poor data gathering and reporting
    b. lack of knowledge of how to report incidents and behaviours
    c. employees and students feel that reporting processes are burdensome, or are not willing to report to the University
    d. formal processes are not fit for purpose, have the potential of causing further harm and do not deliver proportionate outcomes.

Underpinning this organisational risk assessment is the established Safety Management System at Griffith University, which serves as the framework for capturing any additional risk assessments conducted at a local level and the subsequent additional controls implemented. There is then a mechanism for sharing these controls (Psychosocial Hub) with other local levels to ensure consistency and collaboration in the proactive approach to mitigating risk for all individuals.

Risk 1: Leadership (at all levels) is ineffective in eliminating gender-based violence

DOMAIN	CONTROLS	BARRIERS	ACTION ALIGNMENT
Student Experience	• Student representation on University Council and subcommittees. • Student representation on the Safe and Respectful Communities Expert Reference Group. • Student representation through the Student Experience Sub-Committee and Residential Accommodation Working Group. • The University has an established Gender-based Violence website to ensure support and resources are easily accessible. • Safe and respectful community messages are embedded within Vice Chancellor and Senior Leader communications to students. • Griffith Accommodation Student Leader training and established protocols.	• Limited visibility of student leadership and engagement in prevention and response may reduce broader engagement in organisational efforts. • Use of formal representative mechanisms may limit broader student engagement in prevention and response planning. • Consultation methods may not consistently capture the perspectives and experiences of marginalised student cohorts.	• Standard 1, #1: Embedded student safety and wellbeing representation in governance. • Standard 1, #3: Expanded consultation with students more broadly and marginalised cohorts.
Learning and Teaching	• The Deputy Vice Chancellor (Education) leads Respectful Conversations initiatives. • Messaging and resources are provided to staff ahead of teaching periods, including respectful conduct reminders for students and employees.	• Teaching staff may vary in confidence and capability to appropriately manage disclosures, boundaries, conduct and referrals. • Casual academic staff aren't required to undertake gender-based violence prevention and response training, creating a gap in consistency.	• Standard 3, #12: Ongoing training and tailored education for teaching staff, including casual academics.
Leaders and Employees	• The University Council composition requires diversity in skills, knowledge, and background, as well as gender representation targets. • Executive Group KPIs include gender equity targets (equal representation at D/E and HEW10). • Gender pay gap monitoring and commitment to reducing identified gaps. • Council and Executive Group undertake annual training, and positive duty requirements are	• Leadership commitment may not consistently translate into visible or effective action addressing gender-based violence. • Managers have variable confidence and capability in responding to workplace sexual, sex- or gender-based harassment, discrimination and related behaviours.	• Standard 1, #4: Assurance framework review and monitoring. • Standard 3, #12: Annual leadership and employee training.

DOMAIN	CONTROLS	BARRIERS	ACTION ALIGNMENT
	embedded in leadership training. • Vice Chancellor promotes safety and wellbeing at Staff Town Halls and Griffith Staff News promotes key messages for employees. • Enterprise Agreement provisions include paid gender affirmation leave, family and domestic violence leave, Australian Aboriginal and Torres Strait Islander cultural obligations leave and non-gendered parental leave. Additionally, the Flexible Work Policy supports an inclusive workplace. • The Employee Engagement Survey tracks engagement, including equity, diversity and inclusion measures and engagement differences across different cohorts. • University executive monitor mandatory employee training completions. • An enterprise-wide baseline psychosocial risk assessment conducted in 2023 informed employee and leader psychosocial risk management resources and training.		
Research	• Multi-disciplinary research expertise within the Gender-based Violence Expert Reference Group membership. • Robust policy settings, including the Responsible Conduct of Research Policy and Research Quality Framework. • Senior academic staff leading interdisciplinary and community-focused research programs, including the Disrupting Violence Beacon, Griffith node of the Centre for Eliminating Violence against Women (CEVAW), Gender Equality Research Network and Sport and Gender Equity@Griffith.	• Perceptions about potential reprisal or career damage may deter HDR students, early career researchers and casual research staff from raising concerns. • Reputation, funding pressures, career or academic status may prevent problematic behaviour from being challenged or scrutinised. • Internal gender-based violence research expertise and evidence are not leveraged within the University's prevention, response and governance practices.	• Standard 1, #3 and Standard 5, #19: Formal engagement with subject matter experts informs planning. • Standard 3, #12: HDR supervisor and specialist training.

DOMAIN	CONTROLS	BARRIERS	ACTION ALIGNMENT
Business and Operations	• Deidentified incident reporting data and trends are considered by the Audit and Risk Committee, the Executive Group, the Academic Committee and the University Council. • Annual budgeting supports prevention initiatives and 24/7 response services for students and employees. • University Council endorses the Safe Campuses Annual Report, which is available to the public. • External student accommodation providers have developed and implemented their own whole-of-organisation prevention and response plans and policies. • Clear accountability arrangements for prevention and response activities between Griffith and accommodation providers. • Regular accommodation provider reporting through University governance structures.	• Competing regulatory priorities, for example, between the National Code, Enterprise Agreements, Fair Work legislation, Queensland Workplace Health and Safety Regulations and privacy compliance requirements. • Gender-based violence risk and response are not consistently embedded across governance, enterprise risk, workplace safety and service delivery systems. • Coordination of GBV risk, prevention and response measures across work areas may be inconsistent, contributing to fragmented activity and unclear accountability. • Data systems do not support an integrated view of trend monitoring, risk identification and escalation, or action and outcome tracking. • GBV prevention and response expectations for partners and affiliates may not be clearly defined, communicated or consistently applied. • Lack of clarity on leadership accountability for prevention and response activities within accommodation settings.	• Standard 1, #2: Established reporting to Council and GBV Regulator. • Standard 6, #25-26: Enhanced data collection, monitoring and reporting. • Standard 7, #34: Annual accommodation provider checklist and provider plans.
All domains	• Gender-based Violence Expert Reference Group provides oversight and expert insights to inform the University's gender-based violence prevention and response initiatives. • Safety Management System Framework and robust safety and wellbeing policy framework, including the Child Safety and Wellbeing Policy, Equity, Diversity and Inclusion Policy, Health, Safety and Wellbeing Policy and Gender Affirmation Inclusion and Support Procedure. • Governance oversight, advice and monitoring through the Equity,	• Leadership commitment to eliminating gender-based violence is not consistently visible. • Leaders are not uniformly equipped to apply trauma-informed, culturally safe, intersectional and victim-survivor-centred approaches. • Prevention and response efforts are fragmented across work areas, resulting in inconsistent practice.	• Standard 1, #1-4: Governance, accountability, consultation and leadership capability and oversight.

DOMAIN	CONTROLS	BARRIERS	ACTION ALIGNMENT
	Diversity and Inclusion Committee with sub-committees, including the Griffith Pride Committee. • Promotion of inclusion via the Griffith Ally Network. • The Strategic Plan embeds organisational values and behavioural expectations, providing a framework to guide decision-making, leadership and institutional culture. • Commitment to Sustainable Development Goals informs strategic priorities and supports accountability for advancing equity, inclusion and social responsibility outcomes. • Participation in the Athena SWAN Charter (and Bronze and Cygnet Awards winner) provides an externally recognised framework for benchmarking, monitoring and advancing gender equity, diversity and inclusion in STEMM.		

Whole-of-organisation assessment

Risks, controls and barriers are organised by functional domain across the University. These domains align with the operational areas identified in the National Code, as detailed below.

GRIFFITH FUNCTIONAL DOMAINS	NATIONAL CODE OPERATIONAL AREAS
Student Experience: initiatives that impact and inform students' day-to-day interactions in University life	Leadership, culture and environment | Structures, norms and practices | Service delivery | Policies and procedures
Learning and Teaching: Initiatives focused on supporting learning and teaching environments and expertise	Leadership, culture and environment | Service delivery | Structures, norms and practices | Policies and procedures
Leaders and Employees: Initiatives that are specific to University employees, leadership roles and groups	Leadership, culture and environment | Structures, norms and practices | Management and governance | Policies and procedures | Community engagement
Research: Initiatives focused on supporting research environments and expertise	Research | Management and governance | Partnerships | Leadership, culture and environment | Community engagement
Business and Operations: Initiatives that underpin and/or inform operational processes and governance structures	Business | Systems and infrastructure | Management and governance | Partnerships | Leadership, culture and environment
Whole of Organisation: Initiatives that integrate and align approaches across all areas of the University to support an institution-wide response.	All operational area domains

Risk 2: Employees, students, residents and other University community members do not feel safe when using physical environments on campus

DOMAIN	CONTROLS	BARRIERS	ACTION ALIGNMENT
Student Experience	• Safety and Security study (2022) to investigate students' sense of safety in on-campus environments. • Coordination between security, accommodation residences and student wellbeing services in response to concerns and incidents. • Signage, wayfinding, lighting, personal safety and emergency support are provided across all campuses • Interim safety measures and directives are embedded in student disclosure, reporting and conduct processes. • Safety plans and individual risk assessments are developed to support students' safety and wellbeing. • Risk assessments are included in event protocols, including for student clubs. • LGBTQI+ student spaces are available at Gold Coast and Brisbane South campuses. • Residential Community Standards, Resident Conduct Procedure, Resident Gender-based Violence Guidelines and induction program. • Established protocols within Griffith Accommodation, including rooming allocation like single-sex flats, event risk assessments, active sign-out processes, resident assistance line, end-of-night rounds.	• Safety risks affecting different student cohorts could be better understood and responded to. • Separate management and governance across residential and University settings may impact the provision of safe, respectful and well-supervised physical environments. • Close living arrangements in student accommodation can intensify interpersonal conflict, relationship issues and harmful behaviours.	• Standard 2, #9: Alternative arrangements and safety planning, including for vulnerable environments. • Standard 4, #18: Risk assessment and safety plan alignment and central points of contact. • Standard 4, #20: Support pathway evaluation and improvement. • Standard 7, #33: Student accommodation risk, safety and support actions.
Learning and Teaching	• Griffith offers 24/7 study spaces with access controls. • The Student Safety and Wellbeing team assists employees in managing concerning student behaviour in teaching environments. • Digital and hybrid teaching activities provide flexibility	• Staff do not feel empowered to address disrespectful or harmful behaviour in learning and teaching settings, including how to seek support. • After-hours teaching, intensive delivery and low-supervision settings could increase perceived and	• Standard 3, #15: Ongoing education and capability building for staff and students. • Standard 3, #17: Policy, system and process review. • Standard 4, #18: Risk assessment and safety planning processes.

DOMAIN	CONTROLS	BARRIERS	ACTION ALIGNMENT
	for students and staff to engage online as well as or instead of on campus.	actual vulnerability in physical spaces. • Teaching timetables, room allocations and campus movement requirements may not fully consider personal safety and accessibility impacts, e.g. reduced lighting during construction. • Due to the small number of reports, it is difficult to identify environmental safety concerns in learning settings.	
Leaders and Employees	• Safety and wellbeing initiatives are promoted to employees through Griffith Staff News and Town Halls. • The Health, Safety and Wellbeing team support a proactive and systematic whole-of-organisation risk management approach. • Interim and safety measures are embedded in employee conduct processes.	• Manager recognition, escalation and response to concerns about unsafe campus environments are inconsistent. • Temporary, casual and contracted staff may not engage with communications.	• Standard 1, #5: Review assurance framework and monitoring activities. • Standard 3, #15: Annual employee and leadership training. • Standard 3, #17: Policy, system and process review. • Standard 4, #18: Risk assessment and safety planning processes.
Research	• The Student Safety and Wellbeing team assists employees in managing concerning student behaviour in research environments. • Respectful research resources are part of the Respectful Communities campaign.	• Research leaders do not consistently identify and manage personal safety, isolation, intimidation and environmental vulnerability. • Safety concerns in research settings may be underreported due to fear of reputational damage, academic or career consequences or perceived inconvenience. • Due to the small number of incident reports, our ability to identify systemic improvements in research environments is limited.	• Standard 3, #15: Annual employee and leadership training, HDR supervisor and specialist cohort training. • Standard 3, #16: Build specialist expertise in risk assessment and responses. • Standard 4, #18: Safety planning and risk assessment processes.
Business and Operations	• Established and embedded maintenance ticketing system to report hazards and repairs. • Campus Master Plans consider accessibility enhancements, gender-diverse amenities, roving and 24/7 security, and security cameras and movement-detection technology capabilities. • Building and campus designs adhere to	• Ageing and diverse campus environments lead to inconsistency in design and accessibility. • Low integration between enterprise risk and gender-based violence nuances, including trauma awareness within enterprise risk, workplace safety and service delivery systems and processes.	• Standard 1, #5: Assurance framework review. • Standard 2, #8: Procurement requirements. • Standard 2, #11: Updated policy framework and accommodation provider requirements. • Standard 3, #17: Policy, system and process review. • Standard 6, #28–29: Improved data collection,

DOMAIN	CONTROLS	BARRIERS	ACTION ALIGNMENT
	Australian Standards, which incorporate principles of equity, diversity, and inclusion. • Contractor induction and onboarding include behavioural expectations. • Agreements with third-party providers, including those for student accommodation, outline specific expectations and requirements. • A single sign-on process protects Griffith's phone book to enhance employee safety.		trend analysis and evaluation.
All domains	• Campus Support officers (on-campus response), personal safety (escort) services and SafeZone app to alert Campus Support if help is needed. • Ease of access to public transport from campus and/or after-hours shuttle services. • Health and Safety Policy and Health and Safety governance via University and local committee structures. • Health and Safety reporting for hazards on campus and Report harmful behaviour for reporting behavioural incidents on campus. • Campus Access and Use Procedure. • Crime Prevention through Environmental Design (CPTED) Audits of University spaces and places, including libraries. • All-gender toilets are available in some areas to enhance inclusion for trans and gender-diverse people in the Griffith community. • The Respectful Communities campaign is displayed on digital screens on campuses.	• Low awareness and/or uptake of safety services, including Campus Support, the SafeZone App, personal safety escort and bus services. • Low trust in safety services, including Campus Support, the SafeZone App, personal safety escort and bus services. • Inconsistency in the visibility of respectful communities, safety communications and campaigns across students and staff. • Inconsistent application of policies and processes relating to respectful and safe conduct across the University. • Reduced safety and wellbeing services and staffing after hours or during weekends and public holidays to respond to individuals at risk and/or incidents that have occurred.	• Standard 2, #9: Alternative arrangements and safety planning. • Standard 3, #15: Education and awareness programs. • Standard 4, #17–18: Trauma-informed response systems and risk assessment processes. • Standard 4, #20: Evaluation of support pathways. • Standard 6, #30: Awareness measures to evaluate the effectiveness of communications and services.

Risk 3: Employees, students, residents and other University community members lack of knowledge and understanding

DOMAIN	CONTROLS	BARRIERS	ACTION ALIGNMENT
Student Experience	• Mandatory Respect at Griffith training for commencing students. • The Student Orientation framework highlights wellbeing, safety, connection, and belonging. • Specialist 'Personal Violence' counsellors are engaged in orientation and training activities. • The Student Safety and Wellbeing team promote prevention. • Pre-departure and orientation initiatives for international students. • Responding to disclosures, respectful relationships and consent workshops for students, including accommodation residents. • Resident induction program and Residential Community Standards. • Student communications across the learning journey.	• Students may choose to engage superficially in training and orientation activities. • A focus on providing early education and messaging regarding safety, support and prevention may impact recall if harm occurs later in the student lifecycle. • University-wide mandatory training content is broad in design and not tailored to specific cohorts. • Low awareness of available workshops, counselling supports, and prevention initiatives impacts student engagement. • Low awareness of confidentiality requirements, rights, exceptions and available support options. • Residents may not distinguish between accommodation rules and University policies and processes.	• Standard 2, #14: NSO recommendations incorporated into policy and processes. • Standard 3, #15: Tailored prevention and disclosure response training, student leader training and ongoing evaluation. • Standard 6, #29-30: Mechanisms to measure awareness of the Plan, policy and processes. • Standard 7, #32: Accommodation-specific education and training. • Standard 7, #33-34: University and accommodation provider policies, procedures and processes. • Standards 3, 4 and 7 (Enabling Initiatives): Respectful Communities promotional campaign.
Learning and Teaching	• Respectful Conversations professional learning series. • Difficult Conversations Reference Guide. • Academic support guide: Tackling contested issues through respectful conversations. • Safety and wellbeing resources are provided to teaching staff to share with their students early in each trimester. • The Student Safety and Wellbeing team services are promoted to academic staff	• Staff uncertainty about how to translate guidance into practice when navigating sensitive or disruptive conduct in teaching environments. • Inconsistent use of safety and wellbeing resources by teaching staff across different Schools and Departments. • Limited measurement of whether resources actually improve staff capability or student outcomes.	• Standard 3, #15: Ongoing education, capability development, training refresh and evaluation. • Standard 3, #16: Specialist expertise development where staff manage disclosures. • Standard 6, #29: Awareness measures to evaluate the effectiveness of communications and services.
Leaders and Employees	• Mandatory Preventing and Responding to Gender-based Violence training for employees and leaders. • Annual Code of Conduct and Conflict of Interest training. • Mandatory employee induction training. • Safety and Wellbeing initiatives promoted	• Lack of ongoing messaging about respectful and safe communities reduces the impact of mandatory training. • Training perceived as generic or compliance-focused, lacking relevance to specific roles or contexts.	• Standard 3, #15: Annual mandatory gender-based violence, Code of Conduct and Conflict of Interest training and leader training. • Standard 6, #30: Monitoring of policy, process and plan awareness. • Standards 3, 4 and 7 (Enabling Initiatives):

DOMAIN	CONTROLS	BARRIERS	ACTION ALIGNMENT
	through Staff News and at All Staff Town Halls.	• Limited measurement of application of learning, beyond completion and satisfaction rates.	Respectful Communities promotional campaign.
Research	• Research Orientation Framework. • HDR Supervisor Procedure alignment with Australian Council of Graduate Research Principles for Respectful Supervisory Relationships. • Code of Practice for HDR Candidature. • Mandatory HDR Supervisor Registration Training Program. • Mandatory Griffith Graduate Research School HDR Orientation Course for candidates. • Respect at Griffith mandatory training for new candidates. • Note: HDR candidates are in scope of the controls listed under 'Student Experience'.	• Mandatory training may be approached as compliance activities, limiting deep engagement and impact. • Difficulty translating principles of respectful supervisory relationships into day-to-day interactions. • Power dynamics or cultural barriers may limit open discussion or make candidates feel unsafe questioning or challenging supervisors, even when expectations are made clear.	• Standard 3, #15: Respect at Griffith, HDR Supervisor Registration, specialist education. • Standard 3, #16: Development of specialist GBV expertise.
Business and Operations	• Annual Declaration of Interest process. • Cybersecurity awareness is embedded into operations. • Modern Slavery training.	• Training and communications may have low engagement or be deprioritised amid competing operational demands.	• Standard 3, #15: Education and capability programs. • Standard 6, #28–29: Collection and evaluation of training participation and effectiveness data. • Standard 6, #30: Awareness measurement mechanisms.
All domains	• Gender-based Violence and Sexual Harm Prevention and Response Policy. • University policies and communications encourage reporting and support-seeking behaviours. • MATE Cultural Change e-learning modules (includes bystander education). • Safe Campuses website and educational resources. • Modern Slavery Policy. • Psychosocial Hub. • Whole-of-organisation Respectful Communities campaign. • LGBTQI+ inclusion and Ally training and resources are	• Low awareness of available supports, resources, policies and procedures due to inconsistent promotion across students, staff and work areas. • Lack of confidence in intervening as a bystander, responding to disclosures or referring to support and reporting systems. • Normalisation of low-level harmful behaviours.	• Standard 3, #15: Whole-of-organisation education and training framework. • Standard 6, #28: Collection of training participation data. • Standard 6, #29-30: Evaluation of awareness and effectiveness. • Standards 3, 4 and 7 (Enabling Initiatives): Respectful Communities promotional campaign.

DOMAIN	CONTROLS	BARRIERS	ACTION ALIGNMENT
	available for all employees and students. • Griffith Ally Network.		

Risk 4: Unacceptable or unlawful behaviour is used by employees, students, residents or other members of the University community

DOMAIN	CONTROLS	BARRIERS	ACTION ALIGNMENT
Student Experience	• Student Reports of Gender-based Violence and Sexual Harm Procedure, Student Conduct, Safety and Wellbeing Policy, Student General Conduct Procedure and Student Charter Framework. • Residential Community Standards, Resident Conduct Procedure, Resident Gender-based Violence Guidelines and induction program. • Student Critical Incident Management Policy. • Support for Students Policy. • Clear guidance on confidentiality requirements. • Interim measures and directives support the safety and wellbeing of all parties. • The Student Integrity team manages conduct reports and investigations. • Mandatory Respect at Griffith training for commencing students. • 24/7 crisis and wellbeing phone and SMS service. • The Student Safety and Wellbeing team promotes and supports reporting and provides case management services. • Specialist 'Personal Violence' counsellors support impacted students • Student Associations and Advocacy services offer support to students.	• Underreporting or reluctance to engage due to fear of retaliation, impact on student accommodation community participation, stigma, or lack of trust in services, processes and/or outcomes. • Alcohol-related and social-event related risks in student accommodation social settings. • Students may avoid reporting or disengage from processes due to a misunderstanding of confidentiality obligations. • Cultural or international student barriers to understanding rights and processes. • Low visibility or engagement with policies after orientation. • Real or perceived power imbalances, peer pressure or problematic group dynamics in residential settings. • Lack of clarity regarding emergency and critical incident management processes. • Students are unaware of support services or perceive barriers to accessing support, such as accessibility, cultural safety and availability of appointments.	• Standard 2, #11: Updated gender-based violence policy framework. • Standard 2, #14: NSO recommendations incorporated into policy and processes. • Standard 3, #15: Student education and prevention programs. • Standard 3, #17: Policy and process review. • Standard 3, #18–20: Support, risk assessment and service evaluation. • Standard 5, #21–27: Reporting, investigation, procedural fairness, disciplinary and appeals processes. • Standard 7, #33-34: University and accommodation provider policies, procedures and processes.
Learning and Teaching	• Work Integrated Learning Policy, Procedure and Guidelines for employees (including for research-based WIL).	• Limited control over third-party (host employer/supervisor) conduct and culture.	• Standard 3, #15: Student and staff education. • Standard 4, #17: Review systems and processes.

DOMAIN	CONTROLS	BARRIERS	ACTION ALIGNMENT
	• Partnership with DFAT. • The Student Safety and Wellbeing team supports Learning and Teaching employees with concerning student behaviours.	• Lack of awareness among students regarding behavioural expectations in professional settings. • Lack of awareness among students about reporting and seeking support from the University for incidents that occur in offshore or WIL/Placement settings.	• Standard 5, #21: Multiple reporting channels. • Standard 5, #22–27: Safe investigation and complaints processes.
Leaders and Employees	• Staff Gender-based Violence and Sexual Harm Response Procedure and Code of Conduct framework. • Performance management processes. • Griffith University Whistleblower Hotline, 'Your Call'. • Employee Assistance Program with specialist domestic violence support (also available to HDR candidates). • Mandatory Preventing and Responding to Gender-based Violence training for employees.	• Underreporting or reluctance to engage due to fear of retaliation, stigma, or lack of trust in services, processes and/or outcomes. • Cultural barriers to understanding rights and processes. • Low visibility or engagement with policies after onboarding. • Mandatory training may be seen as compliance-driven, reducing its impact on meaningful behavioural change.	• Standard 2, #7: Recruitment, promotion, reward and recognition processes consider gender-based violence history. • Standard 2, #11: Updated policy framework. • Standard 3, #15: Mandatory employee training. • Standard 4, #17: Review response systems. • Standard 5, #21–27: Reporting, investigations, disciplinary action and appeals. • Standards 3, 4 and 7 (Enabling Initiatives): Respectful Communities promotional campaign.
Research	• Griffith Graduate Research School employees complete regular training workshops (led by Griffith counsellors and the Safe Campuses team) on managing challenging behaviours and responding to disclosures. • Work-Integrated Learning Guidelines include research-focused WIL. • Interdisciplinary and community-focused research programs, including the Disrupting Violence Beacon, Griffith node of the Centre for Eliminating Violence against Women (CEVAW) and Gender Equality Research Network.	• Cultural or international student barriers to understanding rights and processes. • Underreporting or reluctance to engage due to power imbalances between supervisors, HDR candidates and University processes. • Blurred boundaries between academic supervision and workplace conduct. • Inconsistent responses by staff in supervisory roles.	• Standard 1, #3: Engagement with subject matter experts. • Standard 3, #15–16: Specialist education and capability. • Standard 4, #17: Process review. • Standard 5, #21–27: Reporting and investigation processes.
Business and Operations	• Reporting systems, including Report harmful behaviour, Health and Safety incident reporting process, Campus Support security incident reporting and Safe Zone app.	• Confusion about which reporting tool to use for gender-based violence-related incidents and behaviours. • Low awareness or visibility of Report harmful behaviour	• Standard 2, #14: NSO recommendations incorporated into policy frameworks. • Standard 3, #17: Complaints and response system review.

DOMAIN	CONTROLS	BARRIERS	ACTION ALIGNMENT
		among students, staff and visitors. • Perception that reporting is not anonymous or confidential. • Uncertainty about what is serious enough to submit a disclosure or report to the University. • Staff and students may not recognise inappropriate conduct as reportable. • Inconsistency in disclosure and reporting behaviour across the University.	• Standard 5, #21: Multiple reporting pathways. • Standard 6, #28–29: Improved incident data collection and analysis.
All domains	• Campus Support officers (on-campus response). • Critical Incident Management Framework in place. • Gender-based Violence and Sexual Harm Prevention and Response Policy. • MATE Cultural Change e-learning modules promote bystander intervention. • Report harmful behaviour serves as a central place for disclosures and reports of concerning behaviour, with public, anonymous, and identified options available. • Respect Officer roles across the organisation.	• Inconsistent interpretation of escalation thresholds within emergency and critical incident domains. • Limited awareness of University policy and response to gender-based violence. • Limited uptake of education and training that is not mandated. • Lack of visibility and understanding of Respect Officer roles.	• Standard 2, #11-12: Policy framework connected to local protocols. • Standard 3, #15: Prevention and response education. • Standard 4, #17–20: Trauma-informed responses and support. • Standard 5, #21–27: Safe reporting, investigations, outcomes and appeals.

Risk 5: Employees and students are not equipped to respond effectively to incidents or disclosures of gender-based violence

DOMAIN	CONTROLS	BARRIERS	ACTION ALIGNMENT
Student Experience	• Student Reports of Gender-based Violence and Sexual Harm Procedure and Resident Gender-based Violence Guidelines. • The Student Safety and Wellbeing team promote and support reporting of concerning behaviours and provides case management. • Specialist Personal Violence Counsellors support impacted students. • Mandatory Respect at Griffith training for commencing students.	• Students may not understand their role in responding to disclosures versus formal reporting requirements. • Reliance on students proactively seeking guidance, combined with limited visibility of services that reach into informal peer networks, where disclosures often occur first, means that students may not know when or how to refer someone appropriately. • Perceptions about confidentiality and	• Standard 3, #15: Responding to disclosures training, student leader training, Respect at Griffith. • Standard 4, #18–19: Primary contacts, case management and support pathways. • Standards 3, 4 and 7 (Enabling Initiatives): Respectful Communities promotional campaign. • Standard 7, #32: Accommodation-specific education and training. • Standard 7, #33-34: University and

DOMAIN	CONTROLS	BARRIERS	ACTION ALIGNMENT
	• Orientation and induction programs for students and residential leaders include responding to disclosures education. • Recognise. Respond. Refer. E-learning modules and workshops for students.	availability may limit engagement with University support services. • One-off training limits retention of skills and knowledge over the student journey. • Variability in students within leadership roles across the calendar year may lead to a lack of skills and confidence to prevent and respond to gender-based violence.	accommodation provider policies, procedures and processes.
Learning and Teaching	• Work Integrated Learning Policy, Procedure and Guidelines for employees (including for research-based WIL). • Difficult Conversations Reference Guide. • Academic support guide: Tackling contested issues through respectful conversations. • The Student Safety and Wellbeing team supports Learning and Teaching employees with concerning student behaviours.	• Inconsistent response across the University for incidents that occur in offshore or WIL/Placement settings. • General guidance may not be sufficiently tailored to trauma-informed responses.	• Standard 3, #15: Ongoing education for teaching staff. • Standard 3, #16: Specialist training and expertise. • Standard 4, #18: Risk assessment and support processes.
Leaders and Employees	• Preventing and Responding to Gender-based Violence training is completed by Executive Group and Council and is mandatory for employees annually. • The Student Safety and Wellbeing team assists employees in managing student behaviours. • Specialist Personal Violence Counsellors can support employees responding to disclosures. • Recognise. Respond. Refer. workshops delivered to work units. • Managing Difficult Behaviours workshops are delivered to work units. • Resident Gender-based Violence and Sexual Harm Guidelines, local protocols and frameworks to guide staff through incident management.	• Lack of awareness of supports available to staff who are impacted by or managing student gender-based violence-related concerns. • Poor advice provided by staff to students can lead to mistrust in University services and processes and reluctance to engage in support-seeking behaviour for fear of consequences in ongoing learning and career settings.	• Standard 3, #15: Mandatory annual training and Positive Duty education. • Standard 3, #16: Specialist capability requirements. • Standard 4, #18–19: Primary support contacts and risk assessment systems. • Standards 3, 4 and 7 (Enabling Initiatives): Respectful Communities promotional campaign.

DOMAIN	CONTROLS	BARRIERS	ACTION ALIGNMENT
Research	• Griffith Graduate Research School employees complete regular training workshops (led by Griffith counsellors and the Safe Campuses team) on managing difficult behaviours and responding to disclosures.	• Inconsistent responses by staff in supervisory roles.	• Standard 3, #15: HDR supervisor and specialist education. • Standard 3, #16: Specialist expertise development.
Business and Operations	• 24/7 support lines provided for students and employees. • Respectful Communities campaign links to Gender-based Violence website and resources.	• Low awareness of services, supports and reporting options across student and staff cohorts. • Campaign visibility may fluctuate, leading to inconsistent reach and engagement. • Inconsistent delivery of campaigns across all University cohorts.	• Standard 3, #15: Education and communications. • Standard 4, #20: Evaluation of support pathways. • Standard 6, #30: Awareness measures. • Standards 3, 4 and 7 (Enabling Initiatives): Respectful Communities promotional campaign.
All domains	• Safe Campuses and Gender-based Violence web resources, including a tip sheet and disclosure flowchart. • Respect Officer roles across the organisation.	• Low awareness or visibility of web resources, particularly among students and staff who have not actively sought information. • Lack of regular feedback to assess whether resources are actually improving response capability. • Lack of visibility and understanding of Respect Officer roles. • Uncertainty about when incidents in student accommodation should be escalated to University services.	• Standard 3, #15: Training framework. • Standard 3, #16: Specialist responder capability. • Standard 4, #18–20: Support, case management and continuous evaluation. • Standard 7, #33-34: University and accommodation provider policies, procedures and processes. Standards 3, 4 and 7 (Enabling Initiatives): Respectful Communities promotional campaign.

Risk 6: Available supports aren't effective, accessible, widely known, or have the potential to cause more harm

DOMAIN	CONTROLS	BARRIERS	ACTION ALIGNMENT
Student Experience	• Student communications promote support options across the learning journey. • Mandatory Respect at Griffith training for commencing students introduces reporting and support services. • Orientation and market day activities promote services and options. • Referral pathways are embedded within student	• Communication campaigns may be seen as generic and not relatable to different cohorts (e.g., HDR, international, online). • Despite mandatory training for commencing students, they may not recall how to access supports at the point of need. • Limited student awareness that their feedback leads to action.	• Standard 2, #14: NSO recommendations incorporated into policy and processes. • Standard 3, #15: Ongoing awareness and education. • Standard 4, #18: Risk assessment, support planning and case management. • Standard 4, #19: Separate support contacts for

DOMAIN	CONTROLS	BARRIERS	ACTION ALIGNMENT
	services and student accommodation processes. • Confidential support and reporting services are available, including on-campus and 24/7 services. • Continuous feedback and improvement processes are embedded in student services. • Griffith student counsellors provide in-curriculum workshops on related themes, while promoting the services available. • Resident induction programs, Griffith Accommodation and Student Leader support in-residence, annual Responding to Disclosures training. • Risk assessment and safety planning processes, including relocation in student accommodation settings.	• In-curriculum workshops do not reach all students or disciplines. • Perceived confidentiality restrictions reduce help-seeking behaviour. • Limited privacy in shared environments, uncertainty about where to seek support and fear of affecting accommodation arrangements may limit help-seeking.	disclosers and respondents. • Standard 4, #20: Evaluation of support pathways and feedback mechanisms. • Standard 7, #32: Accommodation-specific education and training. • Standards 3, 4 and 7 (Enabling Initiatives): Respectful Communities promotional campaign.
Learning and Teaching	• Safety and wellbeing resources are provided to teaching staff to share with their students early in each trimester. • The Griffith Psychology Clinic provides practical spaces for learning and teaching in trauma-aware practice. • Work Integrated Learning activities hosted by Griffith student services provide practical application of learning and teaching in trauma-aware practice.	• Information provided early may not be retained when issues arise later in the trimester. • Inconsistent use of safety and wellbeing resources by teaching staff across different Schools and Departments. • Variable participation in WIL activities hosted by Griffith, meaning not all students will be exposed to relevant knowledge.	• Standard 3, #15: Ongoing awareness and capability development. • Standard 4, #20: Review support effectiveness.
Leaders and Employees	• The Vice Chancellor promotes wellbeing, safety and reporting at All Staff Town Halls. • Griffith Staff News promotes key wellbeing, safety and support messages for employees. • Confidential counselling services are available to employees (also accessible to HDR candidates). • An Employee Engagement Survey is conducted at regular intervals, and results are analysed and addressed at the	• Attendance and engagement at Town Halls may vary across staff cohorts and messages may not be consistently reinforced at local leadership levels. • Passive format of communication (email/staff news) may limit engagement and retention of knowledge. • Reluctance to access counselling service due to stigma or distrust in the service being confidential or independent.	• Standard 3, #15: Ongoing awareness and capability development. • Standard 4, #20: Review support effectiveness. • Standards 3, 4 and 7 (Enabling Initiatives): Respectful Communities promotional campaign.

DOMAIN	CONTROLS	BARRIERS	ACTION ALIGNMENT
	organisation and local levels, including engagement scores across cohorts (including gender, disability, LGBTQI+, First Peoples, culturally diverse) and benchmarking against Australian and New Zealand Universities.	• Issues or actions identified through employee engagement surveys may not be consistently implemented or sustained at local levels.	
Research	• Mandatory HDR orientation promotes wellbeing and safety services. • HDR peer networks and HDR Advocates help to bridge the gap between informal and formal help-seeking. • Promotion of the ability to access either/both student and staff support services for HDR candidates.	• Information provided early may not be retained when issues arise later in candidature. • HDR candidates may rely more on supervisors than formal services, reducing direct engagement with supports.	• Standard 3, #15: Awareness and referral education. • Standard 4, #18–20: Support coordination and service evaluation.
Business and Operations	• Griffith Health Clinics are accessible to students and employees. • Annual budgeting supports Student Wellbeing and Accessibility services on campus. • Annual budgeting supports 24/7 response services. • A whole-of-organisation review of complaints processes and resourcing is being undertaken. • An Integrated Care Model framework has been developed to enhance person-centred and trauma-aware reporting experience for impacted students and employees.	• Accessibility and cultural appropriateness not always addressed across support options. • Complexity in coordinating multiple services and purposes within the integrated care model and potential challenges arising from the review of complaints processes.	• Standard 4, #17: Review of policies, systems and complaints processes. • Standard 4, #18–19: Integrated support and contact arrangements. • Standard 4, #20: Service evaluation. • Standard 6, #28–29: Collection of feedback and satisfaction data.
All domains	• Safe Campuses and Gender-based Violence website, educational and other resources provide information about internal and external support options. • The Respectful Communities campaign promotes support options.	• Low awareness or recall of the Safe Campuses website as a central source of support information. • Inconsistency in visibility of respectful communities and safety communications and campaigns across students and staff.	• Standard 4, #17–20: Trauma-informed support systems, risk assessment, dedicated contacts and service review. • Standard 6, #28–29: Satisfaction and outcome monitoring. • Standard 6, #30: Awareness evaluation. • Standards 3, 4 and 7 (Enabling Initiatives): Respectful Communities promotional campaign.

Risk 7: Governance relating to the management of sexual harm and gender-based violence is unclear or inconsistent

DOMAIN	CONTROLS	BARRIERS	ACTION ALIGNMENT
Student Experience	• Student communications promote reporting pathways. • Mandatory Respect at Griffith training for commencing students promotes reporting and support services. • Orientation activities promote services and options. • The student Safety and Wellbeing team supports and manages cases. • Plain-English guidance on confidentiality requirements, purpose and limits. • Promotion of reporting to the National Student Ombudsman in student complaints and reporting resources. • Student Advocacy services are available through Student Associations. • Student Accommodation employee and leadership frameworks to support residents in the event of behavioural incidents. • Central team administers Report harmful behaviour, student conduct, review and appeals processes. • Communications to impacted students throughout the investigation and conduct processes, including reminders, warnings, directives and reprimands.	• Messaging may lack clarity on what to expect after reporting (process, timelines, outcomes). • A high-level overview of reporting pathways is provided in communications and resources, without a detailed explanation of processes. • Students may not understand the distinction between support roles and decision-making authority. • Process-related communications may be perceived as overwhelming, procedural, legalistic, or otherwise difficult to understand. •	• Standard 1, #1–5: Governance, consultation, reporting and assurance activities. • Standard 2, #14: NSO recommendations. • Standard 4, #17: Review policies and procedures. • Standard 4, #18–20: Support pathway improvements. • Standard, 5 #21–27: Clear reporting, investigation, communication and appeal processes. • Standards 3, 4 and 7 (Enabling Initiatives): Respectful Communities promotional campaign.
Learning and Teaching	• Safety and wellbeing resources are included in early-trimester resources for Learning and Teaching employees. • The Student Safety and Wellbeing team accept referrals from teaching staff and can assist students with reporting.	• Early trimester resources are high-level and do not explain governance roles, responsibilities, and processes in detail. • Materials may focus on "what to do" without explaining "who does what" and decision-making accountability. • Academic staff may not understand their responsibilities around referrals and disclosures or how referrals connect to	• Standard 3, #15: Education regarding responsibilities and referral pathways. • Standard 4, #17: Policy and process review. • Standard 5, #21–27: Governance and process clarity through reporting and investigations framework.

		wellbeing, investigation or conduct processes.	
Leaders and Employees	• Gender pay gap monitoring and commitment to reducing identified gaps. • An Employee Engagement Survey is conducted at regular intervals, and results are analysed and addressed at the organisation and local levels, including engagement scores across cohorts (including gender, disability, LGBTQI+, First Peoples, culturally diverse) and benchmarking against Australian and New Zealand universities.	• Limited visibility for employees on how insights inform decision-making or policy changes. • Perceived disconnect between systemic gender equality measures and day-to-day behavioural governance processes. • Staff may under-report sensitive issues in employee surveys due to a lack of psychological safety in survey responses and may not see clear links between survey feedback and governance improvements.	• Standard 1, #1–5: Governance, accountability and assurance. • Standard 3, #15: Leadership training. • Standard 6, #28–30: Data collection, evaluation and reporting.
Research	• The Student Safety and Wellbeing team work with referrals from research staff and can assist students with reporting. • Griffith Graduate Research School staff are trained to respond to disclosures and difficult conversations and can assist candidates in accessing support, reporting or disclosure options. • HDR peer networks and HDR Advocates help to bridge the gap between informal and formal help-seeking.	• HDR candidates may rely more on supervisors than formal services, reducing direct engagement with supports. • Hierarchical relationships or isolated working environments may inhibit escalation or influence whether referrals are made.	• Standard 1, #3: Ongoing consultation with experts and stakeholders. • Standard 3, #15–16: Capability building for research staff and supervisors. • Standard 4, #18: Referral and support pathways.
Business and Operations	• Continuous improvement of reporting forms to enhance data capture and analysis. • A whole-of-organisation review of complaints processes and resourcing is being undertaken. • An Integrated Care Model framework has been developed to enhance person-centred and trauma-aware reporting experience for impacted students and employees. • Formal reporting requirements for student accommodation providers and compliance activities.	• Improvements to forms may not address underlying governance clarity (e.g., who owns decisions, how cases are progressed). • Complexity in coordinating multiple services and purposes within the integrated care model, and potential challenges arising from the review of complaints processes. • Inconsistent data collection across accommodation providers. • Variable response processes between accommodation settings with multiple organisations involved.	• Standard 1, #2: National Code reporting requirements. • Standard 1, #5: Assurance framework review. • Standard 4, #17: Complaints process review. • Standard 4, #18: Safe risk and support planning processes, central points of contact. • Standard 6, #28–30: Data governance, analysis, reporting and awareness evaluation. • Standard 7, #33-34: University and accommodation provider policies, procedures and processes.
All domains	• The Safe Campuses Annual Report includes an analysis	• Annual reporting cadence may limit awareness of or	• Standard 1, #1–5: Governance, consultation,

	of de-identified incident and disclosure data, including data from Campus Support, Report harmful behaviour, Workplace Relations, Griffith Accommodation and Student Safety and Wellbeing.	responsiveness to emerging governance issues or inconsistencies. • Annual reports may not be widely read or understood across all cohorts (students, staff, leaders).	reporting and assurance framework. • Standard 4, #17–18: Integrated and trauma-informed governance systems. • Standard 5, #21–27: Consistent process governance. • Standard 6, #28–30: Data governance, monitoring, evaluation and reporting.

Approach

The University has adopted the public health approach to preventing and responding to gender-based violence. The model aims to:

- prevent harm from occurring in the first place through structural interventions that target risk factors
- effectively respond to issues and incidents when they occur and
- minimise the long-term effects of problematic behaviours.

Recovery: Ongoing review and improvement of systems and processes to impact prevention at all levels.

Tertiary: Interventions for people who have experienced or used harm and violence. Response to behaviours and incidents that occur.

Secondary: Proactive interventions for vulnerable people or cohorts. Actions aimed at intervening and de-escalating behaviours of concern.

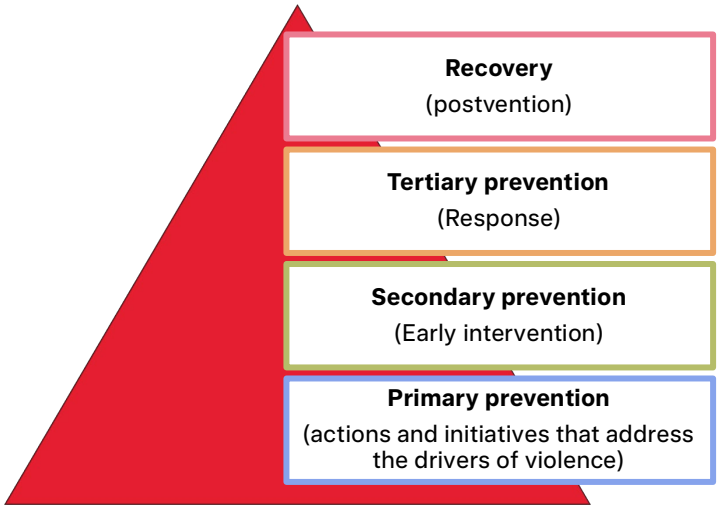


Figure 3: Public health model

Primary: Actions aimed at the whole of the community to provide education, awareness and support before problems occur.

Prevention in action

PRIMARY PREVENTION

The University provides a range of awareness campaigns, educational resources and programs to embed our values and promote safe, respectful and inclusive behaviours that prevent harm from occurring. Educational resources are available via the Safe Campuses and Gender-based Violence webpage and the University's learning management system. Resources, services and expectations are communicated through the University's Respectful Communities campaign.

The University sets formal expectations relating to gender-based violence in the Gender-based Violence and Sexual Harm Prevention and Response Policy.

Griffith's MATE Bystander Program contributed to primary prevention for over a decade. The program, which has been implemented across various sectors and industries, as well as among Griffith students and employees, aims to increase understanding of the drivers of violence while empowering active bystander interventions.

SECONDARY PREVENTION

The University has a strong commitment to equity, diversity and inclusion and provides specialist supports for people with a disability, First Nations students and people impacted by personal violence.

The University promotes bystander interventions and provides Respectful Conversation guides.

Safe and respectful communities messaging is included in resources for vulnerable cohorts, including:

- international student pre-departure and orientation
- LGBTQIA+/Diverse genders, bodies and sexualities (DGBs).

TERTIARY PREVENTION

The University encourages students, employees and other community members to report disrespectful and harmful conduct when it occurs. A range of reporting options is available and promoted to the University community, including online, in-person, anonymous, and identified. More information is available in the relevant student and employee procedures, as well as through the Safe Campuses and Gender-based Violence web pages.

The University promotes its support services to assist individuals who wish to disclose or report harmful and concerning behaviours, regardless of when and where the harm occurred.

RECOVERY	The University provides a range of services and resources to support students and employees who have been impacted by gender-based violence, regardless of when or where harm has occurred. The University, through its employee and student counselling services and Student Safety and Wellbeing, provides ongoing safety and wellbeing support to students and employees who have been impacted by harm, including referrals to outside services as relevant. The University undertakes reflective practice following cases of harmful and concerning behaviour to identify and implement enhancements to processes and practices.

Gender-based violence and its drivers

Gender-based violence is influenced and experienced across an ecological model, incorporating individual, environmental, organisational and societal factors.

Effective prevention requires an understanding of the drivers and spectrum of behaviours that may constitute gender-based violence, including micro-aggressions. Griffith University recognises that gender-based inequalities are a driver of gender-based violence. The University is committed to addressing gender-based power imbalances that perpetuate and compound rigid gender norms and gender-based discrimination.

Drivers are those that:

- enable gendered violence to occur in different work, study, social and living contexts
- influence whether victim-survivors report sexual harm and gender-based violence
- influence how our people and systems respond to sexual harm and gender-based violence.

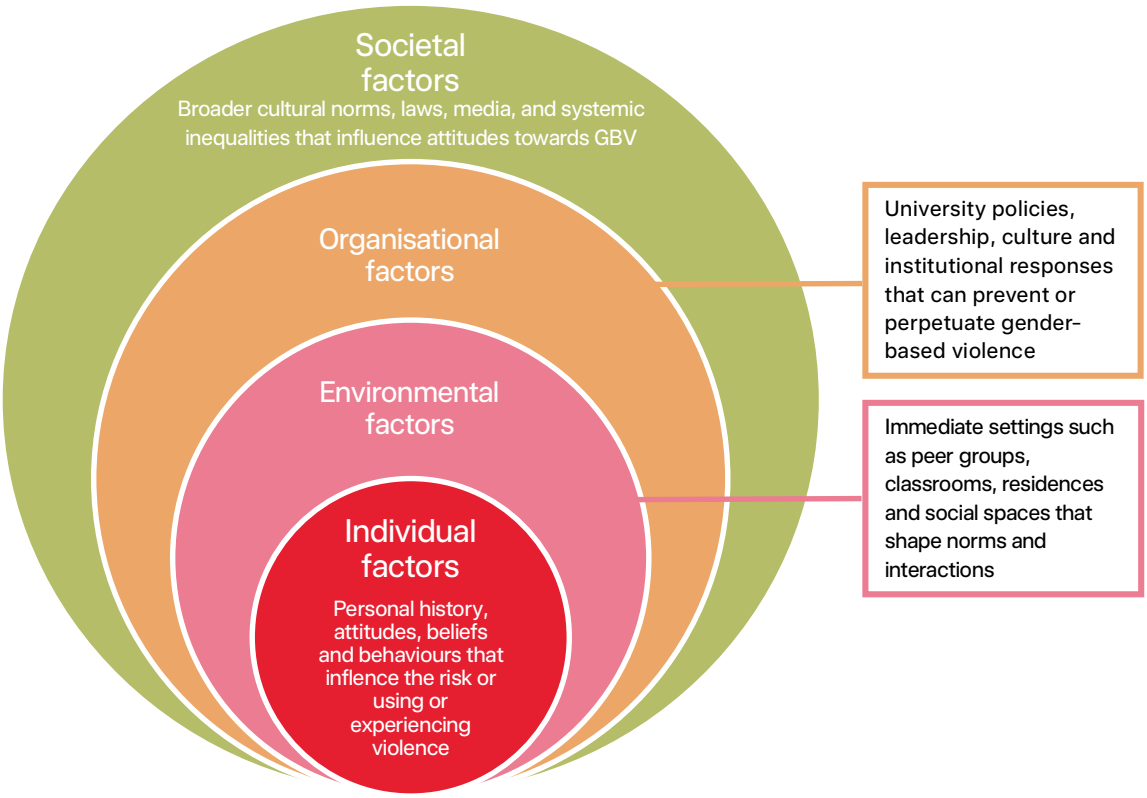


Figure 4: Gender-based violence drivers

Primary prevention: Addressing drivers at the University

Within the context of Griffith University, the following commitments and actions contribute to preventing sexual harassment, other sexual harms and gender-based violence, encouraging reporting and help-seeking behaviours, and ensuring trauma-informed responses. These actions respond to drivers identified by Our Watch and reflect the University's ongoing work to strengthen a safe, respectful, and inclusive community.



Promoting a culture that does not condone violence

- Members of the University community have a clear understanding of the spectrum of behaviours that constitute gender-based violence.
- Members of the University community in response and investigation roles have the appropriate understanding of gender-based violence and apply trauma-informed, person-centred practice.
- Threatening and intimidating behaviours are not tolerated and are proactively addressed, including in online environments.
- Small acts of disrespect or inequality are recognised, challenged, and addressed early.
- Reports and disclosures of sexual harm or gendered violence are taken seriously and responded to with compassion, fairness, and accountability.
- Standards, expectations, and consequences for inappropriate or disrespectful behaviour are clearly communicated, proportionate, and applied consistently across the University.



Promoting gender equity, independence and shared decision-making

- Gender and other forms of diversity are represented and valued in leadership roles and on decision-making bodies.
- The University actively works toward balanced gender and diversity representation across all areas.
- Power imbalances are recognised and addressed through transparent structures, fair processes, and inclusive leadership.
- Policies, processes, and expectations are applied equitably, including across employees and students.
- University structures and systems are designed to be person-centred, inclusive, and responsive to diverse needs and experiences.



Fostering respectful peer relations and positive cultures that reject aggression, dominance and control

- Members of the University community are encouraged and equipped to act as effective bystanders in response to disrespectful or harmful behaviours.
- The University promotes a respectful and inclusive culture and takes action to address environments that tolerate or reinforce gender inequality.
- Student environments (including accommodation, clubs, and social spaces) are supported to foster equality, inclusion, and safety.
- Misuse of technology, online harassment, and trolling are actively discouraged and addressed through clear conduct expectations.
- Initiatives that increase awareness of gender equality and prevent gender-based violence are supported and integrated into University life.



Challenging rigid gender stereotypes and norms

- Members of the University community have access to information and education that promote gender equality and raise awareness of the drivers of gender-based violence.
- All genders are encouraged and supported to participate in diverse study areas, work roles, and leadership opportunities.
- The University promotes positive, respectful expressions of identity and challenges hypermasculine or gender-restrictive behaviours in all settings.
- Expectations about appearance, behaviour, and participation are inclusive and free from gender bias across the University community.



Managing contextual and situational risk factors

- Work areas with high levels of contact with third parties are supported with clear policies, training, and supervision to ensure respectful interactions.
- Teams and individuals working in remote or isolated settings are supported through effective communication, strong connections, and robust safety measures.
- The University promotes equitable conditions for casual and fixed-term cohorts, ensuring access to support and inclusion in safety initiatives.
- Travel and overnight role requirements are supported with clear conduct expectations, risk management practices and access to support contacts.
- Environments where alcohol or other impairing substances are available are managed with appropriate safeguards and expectations for respectful behaviour.

Tertiary prevention and recovery: University responses, reporting and support services

Under Queensland WHS Regulations, organisations are required to include response, reporting, and support services in their prevention plans. Griffith provides a range of options to notify and/or seek support following incidents of gender-based violence and sexual harm. The table below outlines the pathways for students and employees. Further information is available in the following resources:

- Gender-based Violence and Sexual Harm Prevention and Response Policy
- Disclosure and reporting flowcharts for students
- Student Reports of Gender-based Violence and Sexual Harm Procedure
- Resident Gender-based Violence and Sexual Harm Guidelines
- Staff Gender-based Violence and Sexual Harm Response Procedure

Disclosure, reporting and support pathways

DISCLOSING AN INCIDENT	WHOLE-OF-ORGANISATION	EMPLOYEES	STUDENTS
If you or someone you know would like to seek support from the University for matters related to gender-based violence or sexual harm, there are several options for you to make a disclosure, noting that: • A disclosure will not result in the University taking investigative action. • The University will provide support to students and employees, regardless of when or where the incident occurs. • A disclosure to Counselling, Health Services and Chaplaincy will not be included in Griffith Gender-based Violence data, unless a Report of harmful behaviour is also submitted.	• Report harmful behaviour • Integrity and Complaints • University Respect Officer	• Supervisor or Manager • HR Business Partner • Health, Safety and Wellbeing	• Student Safety and Wellbeing • University Respect Officer • Student Accommodation • Student Associations (SRC, GUPSA or Gold Coast Student Guild) • Student Wellbeing and Accessibility, including Counselling, Health Services and Chaplaincy
REPORTING AN INCIDENT	**WHOLE-OF-ORGANISATION**	**EMPLOYEES**	**STUDENTS**
If you or someone you know would like to notify the University about an incident of sexual harm or gender-based violence, there are several avenues to make a formal report. A formal report can be made online or to any of the listed individuals at any stage. Reports can also be made to external organisations, including: • Police • eSafety	• Report harmful behaviour • Integrity and Complaints • SafeZone App • Campus Support Team (Security)	• Supervisor • Manager • Senior Manager • Head of Element • HR Business Partner • HR Director A person who has made a report may be represented by a Health and Safety representative.	• Student Safety and Wellbeing can assist students to make a formal report If a student feels unable to report to the University, they may wish to contact the National Student Ombudsman

- Human Rights Commission.

MENTAL HEALTH AND WELLBEING SUPPORT	WHOLE-OF-ORGANISATION	EMPLOYEES	STUDENTS
If you or someone around you has experienced, witnessed or been exposed to sexual harassment, assault or other forms of gender-based violence, including domestic and family violence, you can access these services and resources for support.	• Domestic and Family Violence Support Procedure (including leave and safety provisions) • Safe Campuses: Reporting and disclosure	• Employee counselling (24/7) including specialist support • Student Safety and Wellbeing can also assist employees supporting students	• Student Safety and Wellbeing • Student Counselling and Wellbeing • Personal Violence Counsellors • Counsellor, Health Practitioner or Chaplain • 24/7 support line • International Student Advisors
PREVENTION PLANNING AND SUPPORT	**WHOLE-OF-ORGANISATION**	**EMPLOYEES**	**STUDENTS**
If you are aware of or have experienced any of the identified risk areas outlined in this Plan and would like further support to implement controls that mitigate any risks, additional support is available.	• Safe Campuses	• Psychosocial risk • Psychosocial Hub	• Student Safety and Wellbeing • Personal Violence Counsellors

Actions

The following actions have been identified through a review of the National Code, workplace health and safety regulations, the risk assessment process, and an analysis of the University's current response and controls. Oversight of these actions resides with the Gender-based Violence Steering Committee.

Enabling initiatives

INITIATIVE	OVERVIEW	CODE ALIGNMENT
Oversight and portfolio management	Chaired by the Provost and reporting to the Vice Chancellor, the Gender-based Violence Steering Committee and Gender-based Violence Working Party bring together resources, expertise, and partnerships to enact the University's Plan. The Steering Committee is responsible for overseeing the implementation and coordination of the Plan and National Code compliance requirements across the University. The Working Group ensures that prevention and response measures are not only evidence-informed but also effectively embedded across the institution. Together, they play a pivotal role in operationalising Griffith University's commitment to preventing gender-based violence, coordinating efforts across the University, aligning initiatives with strategic priorities and ensuring cohesive delivery of outcomes.	All standards
Advisory and internal engagement mechanism	The Gender-based Violence Expert Reference Group brings together students and employees with relevant experience, research expertise, and professional insight to inform Griffith's approach to gender-based violence, including plans, policies, educational initiatives, and broader prevention efforts. This evidence-based approach strengthens the University's commitment to fostering safe, respectful, and inclusive communities.	All standards
External engagement mechanisms	Griffith continues to actively participate in the Universities Australia Technical Working Group, contributing to the development and rollout of the 2026 National Student Safety Survey, including promoting it to all Griffith students. Griffith's professional and academic employees continue to engage in several collaborative initiatives with Australian and international universities (including through research projects and networks, Australasian Universities Safer Communities Symposium, Queensland Tertiary Safer Communities Network, WIL Australia and other communities of practice). Griffith's Disrupting Violence Beacon, through research and work on Advisory Boards and Committees, provides expert advice to local, state, and federal governments, as well as non-governmental organisations, on addressing violence in all its forms. Griffith is one of six Australian universities participating in the ARC Centre of Excellence for the Elimination of Violence Against Women (CEVAW). The Centre mobilises Indigenous and survivor-centred approaches, interdisciplinary collaborations, and Indo-Pacific partnerships to deliver scalable approaches to eliminate violence against women across the legal, security, economic, health, and political systems of Australia and the region.	1.4, 2.5-2.6, 3.3, 3.9-3.10, 6.8, 7.4
Integrated Care Model	The University has developed an Integrated Care Model to ensure, as much as possible, a consistent University-wide approach to supporting individuals impacted by harm, violence, and other concerning behaviours. The Model supports a whole-of-organisation approach by connecting	1.1-1.4, 3.1, 3.3, 4.1-4.3, 5.1, 5.2, 7.1-7.3

	stakeholders in the practical application of University policies and procedures in a way that maximises the delivery of trauma-informed, safety-first practices and increases efficiencies across work areas.	
Information collection strategy	Currently, information on gender-based violence prevention and response is stored across multiple systems, with some data manually recorded or not yet captured. To align with the National Code, the University is developing a unified data model to standardise data collection, improve accuracy, and enable consistent, de-identified reporting. The model aims to provide, insofar as possible, a single source of truth for monitoring compliance, outcomes, and continuous improvement, ensuring data integrity and supporting regular reporting to the Council and the GBV Regulator.	Standard 6
Management of conflicting legislation and instruments with the National Code	An examination of relevant legislation is required to determine how to manage conflicts between the National Code and other regulatory obligations. This includes addressing privacy requirements in relation to informing disclosers about respondent disciplinary outcomes, appeal lodgements, appeal outcomes and reasons for decisions. It also involves reconciling any inconsistencies between the National Code's 45-day timeframe for investigations and disciplinary processes and the longer timeframes mandated under the University's Enterprise Agreement.	5.13-5.20
Review of the complaints framework	The University is currently undertaking a comprehensive review of its complaints ecosystem, including disclosure and reporting pathways, investigation processes, and associated administrative workflows. This review focuses on enhancing trauma-informed, person-centred mechanisms for reporting and disclosure, and improving data collection to better identify trends and risks across the institution. It also aims to ensure that processes are clear and accessible to students, employees, and other members of the University community, and that supporting workflows are secure and intuitive—encouraging effective and timely triage, case management, and communication throughout the complaints process. This review will also integrate the National Student Ombudsman's recommendations from the March 2026 report *'Can I talk about this? – The use of confidentiality requirements in University complaint handling'* into any revised complaints processes.	5.1-5.12
Communications plan	Griffith is committed to fostering a safe, respectful, and inclusive environment for all students, employees and University community members. Central to this is the Respectful Communities campaign. Delivered annually, the campaign promotes prevention messages, expands knowledge and capabilities, and raises awareness of reporting and disclosure pathways to encourage help-seeking and support. The campaign is refreshed each year, informed by internal expertise on gender-based violence, and shaped by feedback collected to guide future iterations. Third parties, including contractors, are engaged through public-facing Griffith websites (e.g., Safe Campuses, Gender-based Violence, Complaints, Policy Library) and contractor induction and onboarding processes that outline behavioural expectations.	3.5, 4.3, 7.5

Prevention and response plan

Standard 1: Accountable leadership and governance

#	CODE ALIGNMENT	ACTIONS	RESPONSIBLE OFFICER/UNIT	TIMEFRAME	OUTCOMES
1	1.1-1.2	Embed student and employee safety and wellbeing representation in University governance to help inform decision-making.	General Counsel Student Life Gender-based Violence Working Party	In place (Q4 annual review)	The University Council composition includes diversity in skills, knowledge, and background, as well as targets for gender representation. Student representation is embedded across Council and its sub-committees. Gender-based Violence governance framework established.
2	1.3, 1.7-1.10	Comply with National Code reporting requirements, including the provision of deidentified information.	Vice Chancellor	Q1 2030 (four-yearly reporting cycle)	A copy of the Plan is provided to the Secretary in line with National Code requirements.
			Gender-based Violence Working Party	Q3 2026 Q2 and Q3 2027 Q2 and Q3 2028 Q2 and Q3 2029	University Council receives regular updates on the progress of the Plan outcomes framework, as well as gender-based violence incident data and trends.
			Vice Chancellor	As required by the GBV Regulator	Report to the Secretary on how the engagement with and views of Students and Employees have informed the development of the Prevention and Response Plan
			Vice Chancellor	Q1 2028 (two-yearly reporting cycle)	A report on the Plan is provided to the Secretary in line with National Code requirements. Additional actions across 2028-2029 will be identified, updated in the Plan and included in the report to the Secretary.
3	1.4, 1.11-1.12	To support a continuous improvement approach, provide ongoing opportunities for consultation on the Plan with: • employees and students, including student accommodation residents	Gender-based Violence Working Party	2026-2029	Students and employees, including those with diverse backgrounds, as well as other stakeholders, inform the Plan. A whole-of-organisation plan is available to employees and students, demonstrating the University's commitment to preventing and responding to gender-based violence.

#	CODE ALIGNMENT	ACTIONS	RESPONSIBLE OFFICER/UNIT	TIMEFRAME	OUTCOMES
		• those from diverse and vulnerable cohorts • those with lived experience of gender-based violence. Update the Plan periodically following engagement with students and employees, feedback from the Gender-based Violence Regulator, NSO recommendations, or case review processes, and seek Council endorsement for any amendments.			
4	1.4	Following the GBV Regulator's final assessment, publish the Plan on the Gender-based Violence website and promote it to students and employees.	Gender-based Violence Working Party	As required by the GBV Regulator	Students and employees are informed about the Plan through various channels, including newsletters, websites, social media, training modules, orientation sessions, and onboarding activities.
5	1.4	Review any gaps and/or continuous improvement opportunities of the current assurance framework and activities within the Safety Management System.	Health, Safety and Wellbeing	Q1 2027	Consistent and effective monitoring and measurement of existing controls. Assurance regarding the completion and review of local-level and organisational risk assessments.

Standard 2: Safe environments and systems

#	CODE ALIGNMENT	ACTIONS	RESPONSIBLE OFFICER/UNIT	TIMEFRAME	OUTCOMES
6	2.1 (a)	Employment processes facilitate employee and student compliance with Queensland Working with Children Check requirements (Blue Card).	Academic employees and students: Provost monitored via Academic Committee Professional employees and Student Accommodation (PSSA) providers: COO	In place	The wellbeing, psychological, and cultural safety of children are prioritised. The University maintains compliance with legislative requirements.

#	CODE ALIGNMENT	ACTIONS	RESPONSIBLE OFFICER/UNIT	TIMEFRAME	OUTCOMES
7	2.1 (b-d)	Employment processes (including for University Council) facilitate the consideration of: • prior allegations or substantiated claims of gender-based violence during recruitment • substantiated claims of gender-based violence in promotion, reward and recognition processes.	Human Resources	Q1 2026	Publish updated employee recruitment, promotion, reward and recognition policies and procedures. Develop and publish resources to support decision-makers in recruitment, promotion, reward, and recognition processes.
			Human Resources Digital Solutions	Q2 2026	HR systems securely capture employee declarations and associated outcomes.
8	2.1 (e)	Procurement processes address the management of staff who are not employees who have been investigated for or found to have committed gender-based violence.	Finance General Counsel	Q2 2026	Update tender processes to highlight National Code requirements.
9	2.1 (f)	University processes support alternative teaching, research, supervision, workplace and student accommodation arrangements for students and employees disclosing allegations of gender-based violence as far as reasonably practicable.	Student Wellbeing and Accessibility Griffith Accommodation Human Resources	In place	Students and employees are supported with safety plans and alternative arrangements where needed.
10	2.2	Capture declaration of existing or prior conflict of interest in employee relationships with students.	General Counsel	In place (Q3 annual review)	Conflict of interest management plan put in place, monitored by the employee member's supervisor and approved by the Unit's leader.
11	2.3–2.4, 2.7, 2.8	Develop a gender-based violence policy by renaming and updating the existing Sexual Harm Prevention and Response policy to include National Code compliance requirements. Refresh the Inclusive and Accessible Policy Guide to ensure gender impacts	Gender-based Violence Working Party Vice Chancellor (policy approval authority)	Q1 2026 Q1 2029 In place: All other Code requirements not listed in the outcomes column	An updated policy addresses: • definition changes • coverage of affiliated organisations, including those that operate, use or lease land on Griffith campuses • consideration of gender impacts • prohibition of non-disclosure agreements and non-disparagement

#	CODE ALIGNMENT	ACTIONS	RESPONSIBLE OFFICER/UNIT	TIMEFRAME	OUTCOMES
		are considered in policy development. Require external providers of Student Accommodation to adopt Griffith policies or to have their own policy that Griffith can contribute to and align with the National Code requirements.			clauses, as required in the National Code
12	2.3–2.4, 2.7, 2.8	Develop local area gender-based violence guidelines for key roles and work areas, including Respect Officers and Griffith Accommodation.	Gender-based Violence Working Party	Q4 2026	Policy is supported by local area gender-based violence guidelines, enabling consistency in responses across the organisation.
13	2.5-2.6	Retaining details and findings of the process, consult on any amendment to the policy with communities, which will include the following cohorts: • employees and students • those from diverse and vulnerable cohorts • those with lived experience of gender-based violence • subject matter experts • third-party providers of work-integrated learning for students.	Gender-based Violence Working Party	Q1 2026 Q1 2029	Corporate and policy governance frameworks, as well as University committee structures, promote and enable consultation.
14	2.9	In line with the NSO's *"Can I talk about this?" The use of confidentiality requirements in University complaint handling* report, update policies and processes and develop student resources to: • clarify that confidentiality applies to the formal process (not to a student's experience)	Gender-based Violence Working Party Student Life General Counsel	Q3 2026 As required by the National Student Ombudsman	Policies, procedures and processes are clear on confidentiality requirements and are proportionate and trauma-informed. Policies, procedures and processes are fit for purpose for disclosers and respondents and compliant with any recommendations from the National Student Ombudsman.

#	CODE ALIGNMENT	ACTIONS	RESPONSIBLE OFFICER/UNIT	TIMEFRAME	OUTCOMES
		• introduce explicit exceptions that allow access to support, legal advice and external bodies (including the NSO) • provide clear release points at the conclusion of a matter. All recommendations from the NSO are considered and actioned across Griffith's policy, complaints and investigations processes.			

Standard 3: Knowledge and capability

#	CODE ALIGNMENT	ACTIONS	RESPONSIBLE OFFICER/UNIT	TIMEFRAME	OUTCOMES
15	3.1-3.3, 3.6, 3.8-3.13	Provide and regularly evaluate to improve the range of gender-based violence prevention and responding to disclosures education and training programs offered to employees, students, specialists and leaders to ensure they meet current best practice. This offering includes: Mandatory training*: • Commencing students: Respect at Griffith. • Griffith Accommodation residents: Respect in relationships (including consent). • Student leaders (including in Griffith Accommodation): responding to disclosures of gender-based violence and sexual harm • Employees: (annual) Preventing and responding to gender-based violence; Code of Conduct; Conflict of Interest	Gender-based Violence Working Party	In place (Q3 annual review)	Griffith promotes and continually refines (based on feedback and enhancements to best practice), education and training programs that are: • trauma-informed, person-centred and evidence-informed and aligned to current best practice • regularly updated to meet changing developmental and best practice requirements • inclusive and accessible, culturally appropriate and sensitive to the needs of the cohort • developed with engagement of students, employees, experts and those representing specialist knowledge groups (including equity cohorts and those with lived experience). Programs will increase awareness and understanding of: • driving and contributing factors • compounding factors such as inequality, discrimination and power dynamics • respectful relationships and consent

#	CODE ALIGNMENT	ACTIONS	RESPONSIBLE OFFICER/UNIT	TIMEFRAME	OUTCOMES
		• HDR supervisors: HDR Supervisor Registration • Leaders: (annual) Positive Duty to prevent sexual harassment • Those receiving disclosures: annual tailored professional development • Those managing formal reports: tailored professional development at least once every 3 years Opt-in education includes LGBTIQ+ inclusion, Respectful Conversations, Academic Support Guide, Ally and Bystander training.			• the role of ethical bystanders • reporting channels available • information about how to make Disclosures and formal reports • support services and resources available. *Note, special procedures are in place for those where the content may be triggering.
16	3.14, 3.16-3.17, 4.4	Relevant employees will have the appropriate level of expertise and experience for dealing with: • risk assessments for all disclosures and • formal reports, including managing investigations and disciplinary proceedings.	Student Wellbeing and Accessibility Human Resources General Counsel	Q3 2026 Q3 2029	Risk assessments and Formal Reports are conducted by employees with Gender-based Violence specific expertise in: • assessing risk, including knowledge of static/dynamic and protective factors • gender-based violence types, patterns and effects • the range of experience across different groups of people • the nature and impact of coercive control For Formal Reports, expertise in: • responding in a trauma-informed, person-centric manner • understanding the impact of trauma on behaviour, memory, health and wellbeing • running investigations, including taking and recording statements, handling reports and disclosures and procedural fairness.

Standard 4: Safety and support

#	CODE ALIGNMENT	ACTIONS	RESPONSIBLE OFFICER/UNIT	TIMEFRAME	OUTCOMES
17	4.1-4.3	Review policies, procedures, systems, and processes to ensure they deliver best-practice, person-centred, trauma-informed responses.	Student Wellbeing and Accessibility Human Resources General Counsel	Q4 2025 Q4 2028 (continuing ad hoc in response to case review)	Fit for purpose policies, procedures, systems and processes for disclosers and respondents.
18	4.4-4.7	Align existing risk assessment and safety planning processes for students and employees with National Code requirements. Provide disclosers and respondents with a primary point of contact who has the relevant expertise to manage the communication of relevant information and provide appropriate support.	Student Wellbeing and Accessibility Human Resources Workplace Health and Safety General Counsel	In place	Alignment of risk assessment and safety planning process to the National Code and the University risk framework. Provide for disclosers/formal reports or as needed to respondents: • safety plan and risk assessment with regular reviews. Safety plans will give serious consideration to the views of the discloser. • case management for support options, including academic/workplace adjustment, and supporting respondents through formal investigation processes, referral to urgent support services, access to translation and interpreter services if required.
19	4.8	Provide appropriate support to disclosers with a primary point of contact who is not also providing support for the respondent(s).	Student Wellbeing and Accessibility	In place	The primary point of contact for disclosers and respondents is different employees.
			Human Resources	Q1 2026	The primary point of contact for disclosers and respondents is different employees.
20	4.9-4.10	Through Griffith's annual Strategic Planning review process, monitor and evaluate the effectiveness of Griffith's support pathways and services for students and employees. Review existing feedback mechanisms	COO DVCE	In place (Q3 annual review)	Develop and implement feedback mechanisms to inform review and improvement. An evaluation report on the University's support services is provided to the Secretary in line with National Code requirements.

#	CODE ALIGNMENT	ACTIONS	RESPONSIBLE OFFICER/UNIT	TIMEFRAME	OUTCOMES
		to identify gaps and recommendations for improvement.			

Standard 5: Safe processes

#	CODE ALIGNMENT	ACTIONS	RESPONSIBLE OFFICER/UNIT	TIMEFRAME	OUTCOMES
21	5.1-5.3	Provide multiple channels for students, employees and members of the public to submit disclosures and formal reports to the University.	Student Wellbeing and Accessibility	In place	Students can disclose or formally report to Student Safety and Wellbeing, Personal Violence Counsellors, specially trained employee responders, and student leaders, or report online, by email, or over the phone, including anonymously.
			Human Resources	In place	Employees can disclose or formally report to Human Resources, their manager, and specially trained employee responders, or report online, by email, or over the phone, including anonymously.
			Chief Operating Officer	In place	The University community and members of the public can disclose or formally report to a University Complaints Officer, report online, by email, in person, or over the phone.
22	5.4	Griffith provides a reasonable and proportionate response to all disclosures and formal reports, regularly reviewing them to identify trends and associated risks, and ensures that appropriate responses are provided.	Gender-based Violence Expert Reference Group	In place (annual review in Q4 from 2026-2030)	Griffith continues to deliver best practice support for disclosures and formal reports.
23	5.5–5.6	Policy setting that allows multiple pathways for managing disclosures.	Policy team For implementation: General Counsel Student Wellbeing and Accessibility Human Resources	Q1 2026	Relevant policy and procedures ensuring the availability of pathways for: • a discloser and respondent to gain a mutually agreed resolution • putting in place safety measures without conducting an investigation • taking or not taking a disclosure to investigation.

#	CODE ALIGNMENT	ACTIONS	RESPONSIBLE OFFICER/UNIT	TIMEFRAME	OUTCOMES
24	5.7-5.12	Update Griffith's Policy and investigations processes to meet the requirements of the Code.	Policy team	In place (students)	Views sought of discloser when an investigation is proposed following a disclosure, noting this would only be considered, and may be necessary despite a discloser's views, where there are safety and/or wellbeing issues for employees and/or students. The discloser and respondent are enabled to bring a support person to the investigation meetings.
			Policy team	Q1, 2026 (employees)	Views sought of discloser when an investigation is proposed following a disclosure, noting this would only be considered, and may be necessary despite a discloser's views, where there are safety and/or wellbeing issues for employees and/or students. Discloser and respondent are enabled to bring a support person to the investigation meetings.
			Policy team	Q1, 2026	There is no requirement for the discloser to provide physical evidence. The scope of investigations may include incident reports without connection to Griffith, other than employee or student involvement. The scope of the investigation will take due regard to the safety and wellbeing considerations of employees and students. Disclosers and respondents are informed in writing of an investigation on the same day, but with the discloser's notification being issued first.
25	5.13-5.20	Policy settings must ensure procedural fairness, have a defined timeline for final resolution, provide respondents with progress updates, allow multiple pathways for managing outcomes of	Policy team	Q1 2026	Relevant policy and procedures ensuring the availability of pathways for investigation outcomes, to include: • discloser and respondent to gain a mutually agreed resolution

#	CODE ALIGNMENT	ACTIONS	RESPONSIBLE OFFICER/UNIT	TIMEFRAME	OUTCOMES
		investigations, and any disciplinary outcomes should be proportionate.			• putting in place safety measures without progressing to disciplinary measures • opportunity to both take and not take disciplinary measures • the process is procedurally fair, and any sanction is proportionate • unless advised they don't wish to be, disclosers informed on the same day the respondent is notified, that the investigation has concluded and whether a disciplinary process will be commenced • from the submission of a formal report, an investigation, including issuing of any disciplinary process, must be completed in line with the times specified within relevant procedures and overall, within 45 business days • an extension to the 45-day timeline can only be granted by the Vice Chancellor • unless advised they don't wish to be, disclosers and respondents should be provided with regular updates of progress in line with the frequency specified within relevant procedures.
26	5.21	Policy settings must ensure that processes are in place for updating disclosers on the progress of their formal reports, and that alternative complaint options comply with relevant regulations.	Policy team	Q1 2026	Unless advised that they don't wish to be, relevant policy and procedures ensure written notice is provided to disclosers of: • investigation or disciplinary outcomes, with reasons, and any sanctions applied • their right to make a complaint internally or externally (for employees).
			Policy team	In place	Unless advised that they don't wish to be, relevant policy and procedures ensure written notice is provided to disclosers of:

#	CODE ALIGNMENT	ACTIONS	RESPONSIBLE OFFICER/UNIT	TIMEFRAME	OUTCOMES
					• their right to make a complaint internally or externally • for students, their right to complain to the National Student Ombudsman.
27	5.23-5.28	Policy settings must ensure processes for updating disclosers on appeals are compliant.	Policy team	Q1 2026	Relevant policy and procedures ensure: • written notice is provided to disclosers (in situations where they have been advised of disciplinary process outcomes) within two business days that a respondent is appealing a decision, and the potential outcomes of the appeal • appeals must be completed in line with the times specified within relevant procedures and overall, finalised within 20 days • any extension to the 20-day timeline can only be granted by the Vice Chancellor. Unless advised they don't wish to be, relevant policy and procedures ensure written notice is provided to disclosers of: • the outcome and decision of the appeal, with reasons, and any sanctions applied on the same day that the respondent is notified • their right to make a complaint internally or externally. • for students, their right to complain to the National Student Ombudsman

Standard 6: Data, evidence and impact

#	CODE ALIGNMENT	ACTIONS	RESPONSIBLE OFFICER/UNIT	TIMEFRAME	OUTCOMES
28	6.2, 6.3, 6.5, 6.6, 6.10, 6.11(a)	Create a data collection strategy to ensure that data is collected in a safe, trauma-informed, person-centred manner that Griffith can use to improve its performance. Create a secure repository to provide relevant information on consultation and approval processes as required by the National Code that is to be provided to the Secretary to evaluate Griffith's performance and that of the Sector.	Gender-based Violence Working Party	Q2 2026 (annual review of strategy and data collection processes)	Approaches that safely capture: • processes for creating and updating relevant plans, policies, procedures, awareness, education and training initiatives • successful completion of the activity on engagement with education and training initiatives • de-identified data on incidents that facilitates trend analysis and identification of systemic issues and cultural barriers. Demographic information on disclosers and respondents that includes: • incident type, location, who was involved (including if third party), reporting mode, if anonymous, relationship if known between discloser and respondent (in what capacity), if there were multiple related incidents or parties involved and if immediate safety response was required and if it involved emergency services • demographic characteristics of student disclosers and respondents, including mode of attendance, year of study, full-time equivalency, campus/online, whether undergraduate, postgraduate (research or coursework), status, whether international or domestic, country of birth (and if relevant, year of arrival in Australia), and provider if in student accommodation. • demographic characteristics of employee disclosers and respondents, including basis of engagement, classification and role function, and academic level if also registered as a student

#	CODE ALIGNMENT	ACTIONS	RESPONSIBLE OFFICER/UNIT	TIMEFRAME	OUTCOMES
					• disclosures requiring the involvement of a third party (e.g. an interpreter, support person, legal representative, etc.) • risk assessments conducted and the number and types of safety measures and support, including academic adjustments, offered to all parties • number and proportion of disclosures elevated/not elevated to formal report • number of investigations, resulting outcomes, number and types of disciplinary progress and their outcomes (including exclusions), proportion of disclosures and formal reports not leading to disciplinary outcomes, alternate actions taken and the point at which no action was agreed to be taken • number of respondents relocated from student accommodation • number of NDA proposed and executed • number of appeals, outcomes by number and type • number of formal reports completed within 45 days • declarations made through recruitment processes and the proportion of people recruited • numbers of employee, leaders and students completing training. • level of satisfaction of the discloser and respondent with the processes.
29	6.2 (f), 6.5, 6.6, 6.7, 6.8, 6.9, 6.11(b), 6.12(d)(v)	Objectively analyse information for evaluative and planning purposes, which includes efficacy assessment of approaches and strategies, time for completion of complaint process, levels of satisfaction with engagement process	Gender-based Violence Working Party	Q1 2026	A continuous improvement strategy is employed, using evidence-informed approaches to enhance policy, prevention education, complaint reporting and management, as well as support and investigative services. Feedback mechanisms are in place to assess employee and student awareness of the policy and related procedures for

#	CODE ALIGNMENT	ACTIONS	RESPONSIBLE OFFICER/UNIT	TIMEFRAME	OUTCOMES
		and employee and student awareness assessment of Griffith's support services and complaint mechanisms.			making complaints and available support services.
30	6.9	Develop mechanisms to gauge student and staff awareness of the Plan and objectively analyse data to inform future communication and engagement.	Gender-based Violence Working Party	Implement after the GBV Regulator's final assessment of the Plan	Feedback mechanisms are in place to assess employee and student awareness of the Plan.

Standard 7: Safe student accommodation

#	CODE ALIGNMENT	ACTIONS	RESPONSIBLE OFFICER/UNIT	TIMEFRAME	OUTCOMES
31	7.1 (a, b, d and e))	Employment processes facilitate declarations of gender-based violence and/or existing or previous intimate relationships with a resident from all Griffith Accommodation employees.	Human Resources	Q2 2026	
n/a	7.1 (c)	Recruitment, reward and recognition processes facilitate the consideration of prior allegations or substantiated claims of gender-based violence. Note: All employees in Griffith student accommodation are University employees - Standard 2 (2.1 and 2.2) applies.			See Standard 2, #7 and 9-10.
32	7.1 (f)	Provide education and training programs to Griffith-owned accommodation residents and employees, including those focused on preventing and responding to gender-based violence. Mandatory training*: • for residents: Respect module, relationships and	Gender-based Violence Working Party (Griffith accommodation residents) Human Resources (Griffith employees)	In place (Q1 annual deployment)	Programs are designed and consulted on, as defined in Standard 3, #15. Programs are tailored to the Student Accommodation environment.

#	CODE ALIGNMENT	ACTIONS	RESPONSIBLE OFFICER/UNIT	TIMEFRAME	OUTCOMES
		consent workshops. • for employees: Annual preventing and responding to gender-based violence, Code of Conduct and Conflict of Interest. Opt-in offerings, including LGBTIQ+ inclusion, Ally and Bystander training.			
33	7.1 (g-h)	University procedures enable immediate, necessary and proportionate risk, safety and support actions in response to gender-based violence in Griffith student accommodation. Resident Guidelines provide local protocols for disclosures and formal reports within Griffith Accommodation residential settings, and support University policy.	Academic Committee (policy approver) Provost (procedure approver) Chief Operating Officer (Student Accommodation) Gender-based Violence Working Party	Q1 2026	Procedures for disclosures or formal reports by or about a resident or employee in Griffith student accommodation enable: • all necessary immediate actions to ensure the safety of residents and employees (including considering relocation of the respondent and making available support to all parties) • completion of risk assessments within 48 hours, or immediately, in line with relevant requirements under Standard 4 • implementation of a support plan within 48 hours for the discloser and respondent as under Standard 4. • permanent removal of students or employees from student accommodation, when determined necessary by the University.
34	7.2-7.8	Require external providers of Student Accommodation to develop and implement their own whole-of-organisation gender-based violence prevention and response plan in consultation with: • residents and employees • those from diverse and vulnerable cohorts	Chief Operating Officer	Q1 2026 (Q2 annually)	Griffith develops and implements a checklist to assess whether external accommodation providers are compliant with the National Code. Protocols are in place to escalate matters from external student accommodation providers to Griffith. External providers of Student Accommodation demonstrate their commitment to preventing and responding to gender-based violence through providing Griffith with a

#	CODE ALIGNMENT	ACTIONS	RESPONSIBLE OFFICER/UNIT	TIMEFRAME	OUTCOMES
		• those with lived experience of gender-based violence. Processes are developed for escalating matters between external accommodation providers and Griffith.			prevention and response plan that: • meets the needs of the National Code (7.2-7.8) • includes the ability to share disclosure information with Griffith in specific circumstances provided for in Standard 7.7(e)(iii)(D) • outlines training, education and prevention initiatives • is monitored and evaluated on an ongoing basis • is updated and provided to Griffith every four years.
35	7.9-7.11	Procure Affiliated Student Accommodation Providers to amend agreements to meet National Code requirements. Take necessary actions when an Affiliated Student Accommodation Provider does not contractually agree to implement National Code requirements, including: • reporting the provider to the Secretary • withdraw provider approval to use the University's intellectual property • cease promoting the provider to Griffith students or reserve spaces for Griffith students.	Chief Operating Officer Pro Vice Chancellor (Health)	Q2 2026 (as required for new providers)	Contractual agreements with Affiliated Student Accommodation Providers include compliance with National Code requirements.
36	7.12-7.13	Report to the Secretary on compliance with obligations relating to Student Accommodation.	Vice Chancellor	Q2 2026 Q2 2027 Q2 2028 Q2 2029	The University reports the names of any Student Accommodation: • owned/operated by the University • controlled by the University • affiliated with the University.

Outcomes framework

VISION: A safe, inclusive and respectful Griffith community where students and employees are free from gender-based violence, empowered to thrive, and supported through person-centred, trauma-informed systems.

STANDARDS	GOALS	OUTCOMES	INDICATORS OF SUCCESS	SUCCESS MEASURES
1. ACCOUNTABLE LEADERSHIP AND GOVERNANCE 	Effective governance and a whole-of-organisation approach prioritise safety, respect and accountability.	• Leadership actively drives and monitors gender-based violence prevention and response. • Students and employees help inform planning. • Governance structures embed accountability and expertise in safety and wellbeing. • Transparency and public reporting promote confidence and trust.	• Griffith Prevention and Response Plan endorsed, implemented and reviewed. • Regular reporting to Council and the GBV Regulator, including de-identified data and progress updates. • Leadership representation reflects gender equality and diversity.	• Annually, 100% actions in the Plan are implemented on time. • Council and the Gender-based Violence Regulator receive biannual reports aligned with Code timelines. • Maintain gender balance across Griffith appointments to Council.
2. SAFE ENVIRONMENTS AND SYSTEMS 	University environments are physically, psychologically and culturally safe, supported by systems that prevent and respond effectively to harm.	• Policies, processes and systems uphold safety, respect and equality. • Recruitment, promotion and procurement processes consider safety and risk. • All environments are designed to reduce the risk of gender-based violence. • Continuous improvement occurs through risk assessments, evaluations and reviews.	• Compliance with Working with Children, Conflict of Interest and background checks. • Updated Gender-Based Violence and Sexual Harm Prevention and Response Policy and HR policies are accessible and promoted to all community members. • Health, Safety and Wellbeing induction processes for non-employees address gender-based violence.	• 100% compliance with Working with Children and declaration requirements. • Gender-based Violence and HR policies are reviewed at least every three years. • Updated Health, Safety and Wellbeing induction is communicated to non-employees.

STANDARDS	GOALS	OUTCOMES	INDICATORS OF SUCCESS	SUCCESS MEASURES
3. KNOWLEDGE AND CAPABILITY 	The University community builds the knowledge, skills and confidence to prevent and respond effectively to gender-based violence.	• Comprehensive, inclusive education for all employees, students and leaders. • Targeted training for responders and investigators. • Prevention campaigns promote safe and respectful behaviour • Continuous improvement informed by feedback and evidence.	• Mandatory prevention and response training is completed annually. • Specialist programs for responders, leaders and investigators are refreshed every three years. • Prevention and response campaigns are delivered consistently across the academic calendar. • Evaluation feedback and evidence inform updates to training.	• At least 75% of employees and students complete the annual mandatory training. • 100% of responders and investigators complete specialist refresher training every three years. • Prevention and response campaigns are delivered annually. • Post-training evaluations show ≥ 80% improved understanding of gender-based violence, reporting and support.
4. SAFETY AND SUPPORT 	Responses and support services are person-centred, trauma-informed and effective for both disclosers and respondents.	• Accessible, safe and confidential supports for disclosers and respondents. • Individualised safety plans and adjustments are implemented promptly. • Trained employees manage cases with expertise and compassion. • Services are evaluated regularly and improved based on feedback.	• Separate contact officers available for disclosers and respondents. • Risk assessments are undertaken for all disclosures and formal reports. • Support pathways are published, widely promoted and include feedback mechanisms. • Evaluation findings are used to refine services.	• 100% of disclosures and formal reports result in documented risk assessments. • Discloser and respondent feedback on support services is reported annually, with a satisfaction rating of≥ 75%. • All support materials are 100% accessible online and reviewed annually.
5. SAFE PROCESSES 	Reporting, investigation, and resolution processes are fair, timely, and trauma-informed.	• Multiple confidential and anonymous reporting channels are available. • Clear timelines and communication ensure fairness and transparency. • Investigations conducted by qualified personnel following best practice. • Feedback and data are used to improve response processes.	• Online, phone, email, and in-person reporting options are available for students, employees, and the University community. • Investigation and appeal processes meet defined timeframes. • Disclosers and respondents are informed of the progress of formal reports in a timely, transparent, and trauma-informed manner.	• Less than 5% of investigations extend past 45 business days (unless requested by either party). • Less than 5% of appeals are unresolved within 20 business days (unless requested by either party). • 100% of formal reports result in both parties receiving documented updates at each key stage of the process.

STANDARDS	GOALS	OUTCOMES	INDICATORS OF SUCCESS	SUCCESS MEASURES
6. DATA, EVIDENCE AND IMPACT 	Data and evidence are used to measure progress, identify risks and drive continuous improvement.	• De-identified data collected and reported in accordance with the National Code. • Data informs education, policy and support initiatives. • Griffith contributes to the national evidence base. • Regular evaluation informs continuous improvement.	• Comprehensive incident and outcome data collected securely. • Regular reporting to Council and the GBV Regulator, summarising findings. • Evaluations inform revisions to the Prevention and Response Plan.	• Biannual internal reporting and biennial submissions to the GBV Regulator completed. • Evaluation reports result in at least three new or improved initiatives each cycle. • Trend data is published annually (de-identified) on Safe Campuses.
7. SAFE STUDENT ACCOMMODATION 	Student accommodation environments are safe, inclusive and aligned with the National Code's prevention and response commitments.	• All external providers comply with Griffith's gender-based violence policy and/or the National Code. • Residents and employees receive targeted training on preventing and responding to gender-based violence. • Incident management practices ensure timely, trauma-informed action. • Student feedback informs safety improvements.	• Accommodation safety and response policies are in place for all providers. • All external providers complete annual compliance assessments. • Residents are trained during induction and annually thereafter. • Feedback mechanisms embedded in resident programs.	• Griffith annually collects 100% of accommodation provider Plans and completed compliance assessments. • ≥ 95% of Griffith Accommodation staff complete annual training. • 100% of residents in Griffith-owned accommodation and ≥ 80% in Student Accommodation Provider residences report feeling safe and supported in annual surveys.

Plan review

The review of this plan is a crucial step in ensuring its currency, accuracy and the effectiveness of the control measures listed. There are three triggers for when a review of this Prevention Plan will occur:

- as soon as practicable after a report of sexual harassment is made in accordance with the Queensland WHS Regulation
- if Executive Group, a Health and Safety Committee, or a Health and Safety representative requests a review
- every three years.

Reviews will be undertaken in the following way:

- referral or request made for review under any of the above three scenarios to the Gender-based Violence Working Party at safecampuses@griffith.edu.au.
- desktop review of the request undertaken to determine the scope of the review
- relevant stakeholders will be engaged to conduct a review
- if appropriate, consultation will be undertaken with key stakeholders
- University Council will approve any recommendations or updates to this plan
- any updates to this plan will be communicated to employees and students and made available via the Safe Campuses website.

References

The evidence and legislative base for this Prevention Plan includes:

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Roles and responsibilities

The roles and responsibilities stipulated within the National Higher Education Code to Prevent and Respond to Gender-based Violence and the Queensland WHS Act and Regulations are summarised below:

ROLE	RESPONSIBILITY
Vice Chancellor	Risk Owner. Higher Education Principal Executive Officer with obligations outlined in alignment with PCBU (Person Conducting Business or Undertakings). Must ensure, so far as reasonably practicable, the health and safety of anyone engaged to work at the University, as well as ensuring the health and safety of other persons from work or activities undertaken as a part of the business arising within the University. Accountable for compliance with the National Higher Education Code to Prevent and Respond to Gender-based Violence. Act in accordance with the University's Gender-based Violence and Sexual Harm Prevention and Response Policy. Report on this plan and its outcomes to the Department Secretary (gender-based violence Regulator) every two years. Report to the University Council every six months on the outcomes framework to track and measure the effectiveness of actions under this Prevention and Response Plan; including de identified data on incidents of Gender-based Violence experienced by Students and Employees and identification of any trends in the data.
University Council	Endorse amendments to this Prevention and Response Plan. Require for new members to declare whether they have been investigated for an allegation of Gender-based Violence or determined to have engaged in conduct that constitutes Gender-based Violence during the course of their previous employment, or otherwise in a legal process. Act in accordance with the University's Gender-based Violence and Sexual Harm Prevention and Response Policy.
Senior Leaders and People Leaders (or any other role with similar responsibilities within the University)	Must ensure that the PCBU is complying with health and safety obligations. Including understanding the nature of the work conducted at the University, the hazards and risks associated with those activities, and ensuring compliance with the risk management approach in reducing the risk as far as reasonably practicable. Act in accordance with the University's Gender-based Violence and Sexual Harm Prevention and Response Policy.
Employees	Employees must take reasonable care for their own health and safety and that they are not adversely affecting the health and safety of other persons. Employees must comply, so far as reasonably practicable, with any reasonable instructions given by the University or an officer of the University. Employees must act in accordance with the University's Gender-based Violence and Sexual Harm Prevention and Response Policy and co-operate with any other reasonable policy or procedure within the University relating to health and safety which has been notified. New employees will be asked to declare whether they have been investigated for an allegation of Gender-based Violence or determined to have engaged in conduct that constitutes Gender-based Violence during the course of their previous employment, or otherwise in a legal process.

	Identified employees will be required by the University to comply with Queensland's Working with Children Check. Substantiated allegations of Gender-based Violence in the course of employment with the University will be taken into consideration as part of promotion, recognition and reward of employees.
Students	Students must take reasonable care for their own health and safety and that they are not adversely affecting the health and safety of other persons. Students must act in accordance with the University's Gender-based Violence and Sexual Harm Prevention and Response Policy and comply, so far as reasonably practicable, with any reasonable instructions given by the University or an officer of the University.
Affiliated Student Accommodation Providers	Will be required to vary, supplement or otherwise amend any legally binding agreement or arrangement with the University so that it meets the requirements set out in Section 7 of the National Higher Education Code to Prevent and Respond to Gender-based Violence.
University owned Student Accommodation	In addition to responsibilities as employees, accommodation staff are required to declare allegations of Gender-based Violence and/or intimate personal relationships with residents. In addition to responsibilities as employees and students, accommodation staff and residents must undertake prevention and response to Disclosures education and training that meets the requirements of Standard 3. Adhere to the University's policies and procedures relating to the management of disclosures and reports of Gender-based Violence, including through immediate actions and time-sensitive risk assessment and safety planning.
Gender-based Violence Steering Committee	Provides strategic oversight of the implementation of the Gender-based Violence Prevention and Response Plan and National Code requirements, monitoring progress, risks and cross-portfolio actions while ensuring a coordinated, trauma-informed and evidence-based whole-of-organisation approach. Chaired by the Provost, Student Life and Corporate Services are represented on the Steering Committee.
Gender-based Violence Working Party	Brings together resources and expertise to implement the Gender-based Violence Prevention and Response Plan, including responding to requests for review of the Plan and compiling resulting recommendations for consideration by the Vice Chancellor and endorsement by University Council.
Other persons in the workplace	Any other person undertaking activities within the University must take reasonable care for their own health and safety and that they are not adversely affecting the health and safety of other persons. Any other person undertaking activities within the University must comply, so far as reasonably practicable, with any reasonable instructions given by the University or an officer of the University, including the completion of training and education.

Definitions

Key concepts, definitions and examples related to gender-based violence and sexual harm are provided in the table below. These are not necessarily complete legislative or policy definitions but are provided to assist in understanding the Plan. Please consult Griffith policies and legislation for complete definitions if needed.

CONCEPT	DEFINITION	EXAMPLE (S)
Affiliated Student Accommodation Provider	A provider of accommodation to students that is not a Student Accommodation Provider or the University, but is nevertheless affiliated with the University, including (without limitation) by: • any statute, constitution or similar legal instrument that governs or otherwise regulates the University • having a service agreement or other agreement with the University • operating on the University's lands • being authorised by the University to use its intellectual property in its recruitment or marketing materials or on its website • being listed by the University on its website as 'student accommodation' or being promoted by the Provider in its recruitment or marketing material.	Student accommodation on Griffth University campuses that is not owned or operated by the University. Student accommodation that is off-campus and has a legally binding agreement with the University.
Adverse Action	Threatens, organises or takes action to dismiss, injure, alter the position or discriminate for discriminatory reasons.	Refusing to employ a prospective employee because they wish to breastfeed at work.
Discrimination	Treating a person less favourably than another person because of a protected attribute.	A man being offered a job over a woman because she has flexible working arrangements due to family responsibilities. A trans woman loses her job after coming out as trans at work.
Gender-based violence	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.	Women and LGBTIQ+ communities experiencing higher levels of domestic and family violence. Harassing or assaulting another person because of their gender or gender identity. Harmful behaviours against a person or group of people because of biased or harmful beliefs about gender that occur in person, online or using digital technology.

Harassment	Repeated behaviour that is offensive, humiliating, intimidating or threatening.	Continuously asking someone on a date, when they have already said no. Threatening someone because they are gay. Deliberately and repeatedly misgendering someone, using incorrect pronouns or deadnaming to demean or belittle.
Hostile work environment	Creating an environment that a reasonable person would find offensive, intimidating or humiliating to a person on the basis of their sex.	Displaying obscene or pornographic materials, general sexual banter, innuendo or offensive jokes that result in a person of a certain sex feeling unwelcome or excluded.
Micro-aggression	The everyday slights, indignities, put-downs and insults that members of marginalized groups experience in their day-to-day interactions with individuals who are often unaware they have engaged in an offensive or demeaning way	Giving or receiving comments such as "you'd look prettier if you smiled more" based on the gender or identity of that person.
Sex-based harassment	Includes any unwelcome or unsolicited conduct of a sexual nature that is offensive, humiliating, intimidating or threatening.	Making sexist, misogynistic and misandrist remarks about a specific person.
Sexual harassment	Includes any unwelcome or unsolicited conduct of a sexual nature that is offensive, humiliating, intimidating or threatening.	Sexually suggestive comments or jokes that offend or intimidate. Intrusive questions about a person's private life or physical appearance.
Sexual harm	A term used by the University to describe unwanted behaviour of a sexual nature. A term intended to capture a broad range of behaviours, including sexual misconduct. Note: All instances of sexual harm are gender-based violence.	Sexual assault or rape, stalking, sexual harassment and other unwanted sexual behaviour (in person or online communication).
Victimisation	Causing or threatening a detriment to someone.	Threatening to fire someone who agreed to be a witness in a sexual harassment case.
Vilification	In Queensland, a person must not, by a public act, incite hatred towards, serious contempt for, or severe ridicule of, a person or group of persons on the ground of the race, religion, sexuality, sex characteristics or gender identity of the person or members of the group.	Making posts online inciting hatred towards people on the basis of race, religion, sexuality, gender identity or sex characteristics.

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