

# Whole-of-Organisation Gender-based Violence Prevention and Response Plan **and outcomes framework**

1 January 2026 –  
31 December 2029

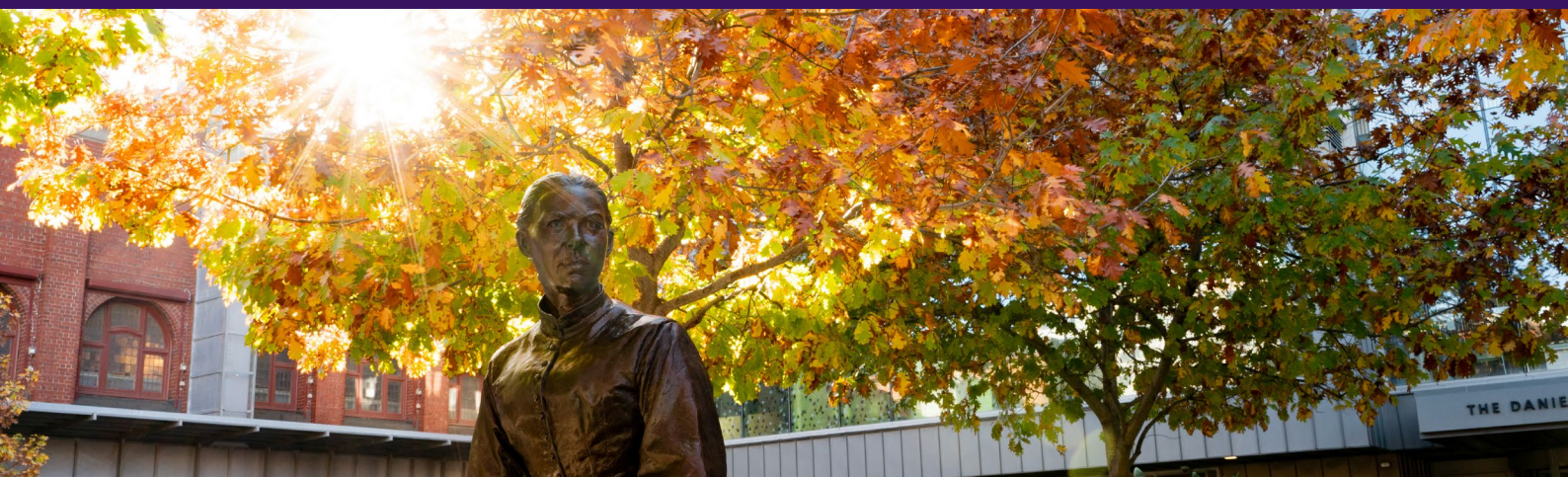
# Acknowledgements

In recognising Aboriginal and Torres Strait Islander people's spiritual and cultural connection to Country and in continuing ACU's commitment to Reconciliation, ACU would like to acknowledge the First Peoples and the Traditional owners and custodians of the country where ACU campuses are located. We respectfully acknowledge our Elders past and present and remember that they have passed on their wisdom to us in various ways. Let us hold this in

trust as we work and serve our communities.

ACU would like to acknowledge the victim survivors of gender based violence, and their strength in reporting their experiences to the university's Safeguarding and Student Safety Team and/or the Safety Support Network. ACU acknowledges the lived experience of victim-survivors and acknowledges their ongoing courage in the face of adversity, trauma and recovery.

ACU recognises and acknowledges that victim survivors are at the centre of the university's response to and prevention of gender based violence. ACU recognises that it plays an important role in prevention by consciously addressing the societal attitudes and power imbalances which contribute to gender based violence.



## Seeking support

If you require support, please reach out to the below services:

### ACU services

#### STUDENTS

Safeguarding and Student Safety Team [respectandsafety@acu.edu.au](mailto:respectandsafety@acu.edu.au), phone 0476 852 735

#### STAFF

[Staffrespectandsafety@acu.edu.au](mailto:Staffrespectandsafety@acu.edu.au), phone 0476 852 735

ACU's Employee Assistance Program (Acacia EAP). Contact 1300 364 273.

### External services

#### FULL STOP

24/7 sexual, domestic and family violence response and recovery service. Call 1800 385 578.

#### LIFELINE

24/7 crisis support. Call 13 11 14.

#### 13 YARN

Support for Aboriginal and Torres Strait Islander community members. Call 13 92 76.

#### INTOUCH

Support for migrant and refugee community members. Call 1800 755 988.

#### QLIFE

LGBTQIA+ peer support and counselling. Call 1800 184 527.

#### MENSLINE AUSTRALIA

Counselling and support for men. Call 1300 78 99 78.

If you are unhappy with how ACU has handled a matter relating to gender-based violence, you can also make a complaint to the **National Student Ombudsman**.

**Provider name:**

Australian Catholic University

**Higher Education Principal Executive Officer name and position:**

Professor Zlatko Skrbis, Vice-Chancellor and President

**Plan period:**

1 January 2026 to 31 December 2029

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## 1. Statement of commitment

As a Catholic university, our mission is at the heart of everything we do. Acting in truth and love, we are committed to improving the lives of others through compassion, empathy and respect, serving our communities and supporting our staff and students.

Violence of all kinds, including gender-based violence, is antithetical to ACU's mission, which prioritises respect for the dignity of every person.

At ACU, we are committed to fostering a safe, inclusive and respectful environment that is free from violence for every member of our community.

The 2021 National Student Safety Survey reported that one in six Australian university students has experienced sexual harassment, underscoring the urgent need for significant cultural change in our sector.

The Australian Government's introduction of the National Higher Education Code to Prevent and Respond to Gender-based Violence (the National Code) presents a significant opportunity for ACU to reflect, strengthen and lead. In alignment with our values, we are taking decisive action to ensure meaningful change.

Our broad-reaching activities to implement the National Code at ACU have been a collaborative endeavour across the university to ensure we meet the Code's seven standards. Our approach was informed by an external review of ACU's processes and practices that identified strengths to build on and areas for improvement. Importantly, it was informed by consultation with students and staff who generously shared their insights and lived experiences.

I have been proud to chair ACU's Interim Gender-Based Violence Taskforce, established to ensure we successfully deliver the National Code, and I look forward to continuing to lead the university's actions to prevent and respond to gender-based violence.

As we move forward, our approach will continue to be guided by the voices of our community, evidence-based best practice, and a shared commitment to safety and respect. I extend my sincere thanks to everyone who has contributed to the development of this plan, especially those who have shared their experiences to inform our ongoing work. Together, we will drive the change needed to ensure that all members of the ACU community feel safe, respected and supported.

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## 2. Provider overview

Australian Catholic University (ACU) is a national institution established in 1990 through the amalgamation of four Catholic tertiary colleges. Grounded in the Catholic intellectual tradition, ACU is committed to academic excellence, ethical leadership, and the promotion of human dignity and the common good. Its values of truth, excellence and service inform all aspects of teaching, research and community engagement.

ACU provides education to approximately 35,000 students and employs more than 2,300 staff (full-time equivalent) across seven campuses in Victoria (Melbourne, Ballarat), New South Wales (North Sydney, Blacktown, Strathfield),

Queensland (Brisbane) and the Australian Capital Territory (Canberra), with an international campus in Rome and extensive online offerings. Melbourne is ACU's largest campus accounting for 30 per cent of ACU's total student population, followed by the Brisbane and North Sydney campuses – each with approximately 15 per cent of the student population. Approximately 15 per cent of ACU's students study fully online. The university operates three purpose-built student accommodation facilities, housing 380 students.

Among the student population, approximately 74 per cent of ACU students identify as women, with 26 per cent of students



identifying as men, and 0.22 per cent of ACU students preferring not to disclose their gender identity. This percentage breakdown reflects ACU's enrolment patterns in disciplines such as education, nursing and allied health.

Sixty-eight per cent of staff identify as women and 32 per cent as men. While ACU recognises non-binary identities in both staff and students, current numbers fall below the national reporting thresholds for the staff cohort.

The National Higher Education Code to Prevent and Respond to Gender-based Violence includes specific community groups who experience higher rates of gender-based violence. This includes women, First Nations people, culturally and linguistically diverse communities, people with disability and people of diverse sexual orientation and gender identity.

ACU-related student demographic data:

- 74 per cent women
- Two per cent Aboriginal and Torres Strait Islander peoples
- 13 per cent come from lower socio-economic backgrounds
- 10 per cent report a disability
- ACU-related staff demographic data:
- 68 per cent women
- 1.3 per cent Aboriginal and Torres Strait Islander peoples

In preparation for the National Higher Education Code to Prevent and Respond to Gender-based Violence, ACU commissioned an independent review of its institutional readiness. The review affirmed ACU's reputation as a safe and inclusive environment and concluded that the university is well positioned to implement a coordinated, whole-of-organisation response to gender-based violence. This aligns with the conclusion of key strategic frameworks in 2025, including the Gender Equality Action Plan and the Gender Equality, Diversity and Inclusion Framework, presenting a timely opportunity to embed renewed commitments to safety and equity.

ACU's safeguarding infrastructure includes a dedicated Safeguarding and Student Safety Team, responsible for managing disclosures, conducting risk assessments, coordinating support services and facilitating trauma-informed, culturally responsive care for students. Key initiatives include:

- comprehensive safeguarding policies
- specialist staff trained in gender-based violence response
- confidential and inclusive reporting pathways
- digital and physical support hubs
- prevention and awareness education for staff and students
- a cross-campus Safety Support Network offering localised assistance.

Currently, ACU staff members who have experienced gender-based violence can seek support either through speaking directly to their manager, accessing support directly from People and Capability, or seeking confidential counselling through the Employee Assistance Program.

ACU's proactive approach, grounded in its mission and values, reflects a strong institutional commitment to preventing gender-based violence and supporting victim-survivors.

# 3. Planning, engagement and evidence

ACU's Whole-of-Organisation Gender-based Violence Prevention and Response Plan (the plan) was developed through a multi-step process that included:

- engaging an independent expert to conduct a gap analysis to inform the scope of work required for implementation of the National Code
- forming a cross-unit project team to lead the work
- reviewing internal data, evidence and procedures
- consulting with students and staff (including priority groups) and experts, including:
  - student focus group and interviews
  - staff engagement survey results and staff focus groups.

Across student focus groups and interviews, there was representation from most priority groups, including students from culturally and linguistically diverse communities; students with disability, chronic illness and neurodivergence; students from the LGBTQIA+ community; and students with lived experience of gender-based violence. Within the ACU context of having a student body that is predominantly women (74 per cent), women were over-represented in student focus groups (100 per cent of participants). This is consistent with challenges noted in the broader gender equity/gender-based violence sector around engaging men and boys in this work<sup>1</sup>, and indicates there may be a similar opportunity to better engage men from ACU's community.

The majority of staff focus group participants were women. They included staff members from a range of backgrounds and lived experiences, including Aboriginal and Torres Strait Islander staff, people living with disability/neurodivergence, staff from culturally and linguistically diverse backgrounds, members of the LGBTQIA+ community, staff with caring responsibilities, and staff with lived experience of gender-based violence.

An overview of ACU's student-facing approach to preventing and responding to gender-based violence can be found at **Respect. Now. Always.**

ACU's staff-facing approach to preventing and responding to gender-based violence will be uplifted. A review of the ACU staff website is in progress to provide an easily visible and more streamlined web presence. ACU is developing a prominent Safety@ACU space, accessible from the university homepage, which will bring together key reporting links and information about support options for gender-based violence for both students and staff.

Both the external review and consultation feedback highlighted the importance of providing a safe and supportive entry point for staff who wish to make a disclosure that sits outside the current staff complaint process. A review of current processes and practices is underway, which includes providing suitably qualified and experienced professionals at ACU to help manage and support staff disclosures.

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## 4. Approach

ACU is committed to fostering a university environment where respect, inclusion and safety are embedded across all campuses, online platforms and student residences. This commitment is operationalised through a coordinated, whole-of-institution strategy to prevent and respond to gender-based violence (GBV), recognising its multifaceted nature and the systemic factors that contribute to its prevalence.

GBV encompasses physical and non-physical forms of harm, including harassment, abuse, coercion and threats, rooted in gendered power imbalances. ACU's institutional response is guided by the **National Higher Education Code to Prevent and Respond to Gender-based Violence**, developed in consultation with victim-survivor advocates, subject matter experts, and higher education stakeholders. The National Code provides a best-practice framework for sector-wide reform and informs ACU's direction. ACU's plan further draws on other national and sectoral frameworks, including the **National Plan to End Violence Against Women and Children 2022 – 2032**, **Our Watch frameworks** and relevant research, to ensure alignment with broader efforts to drive cultural and systemic change.

This plan applies to all students, staff, contractors and visitors across all campuses, learning environments and University-

related activities. It addresses prevention, early intervention, reporting, complaint-handling, support, investigation and outcomes related to gender-based violence. The plan outlines a four-year roadmap (2026 – 2029) to transition ACU from its current state to sector-leading practice. It is underpinned by the following principles:

- **Trauma-informed and victim-centred:** Prioritising safety, trust, choice, collaboration and empowerment; respecting the agency and expertise of victim-survivors; and minimising re-traumatisation through empathetic, non-discriminatory support.
- **Evidence-informed:** Drawing on academic research, professional practice and lived experience to shape interventions and policy.
- **Whole-of-organisation:** Embedding GBV prevention and response across all domains of university life – including leadership, governance, teaching and learning, student services, research and community engagement.
- **Incremental improvement:** Recognising that cultural and institutional transformation is achieved through sustained, iterative reflection and action.

Progress will be tracked through an Outcomes Framework, with regular reporting to the ACU Senate (the governing body)

<sup>1</sup> Flood, M. (2021). *Engaging men and boys in violence prevention*. In L. Gottzén (Ed.), *Men, masculinities and intimate partner violence* (pp.155-169). Routledge.



and the Commonwealth Department of Education. ACU is committed to continuous improvement, guided by its core value of the pursuit of excellence.

ACU acknowledges that its institutional response to gender-based violence is in a developmental phase. While several relevant policies and practices already exist, those focused explicitly on gender-based violence are not yet consistently documented, embedded or applied across all areas of the university. ACU is actively addressing these gaps, strengthening governance, building capability and aligning policies with sector best practice and the National Code. The university is committed to building a more cohesive, trauma-informed and evidence-based framework that ensures the safety and wellbeing of its entire community.

To date, continuous improvement and review processes have included consideration of results and recommendations from the **National Student Safety Survey**, **ACU's annual report on student sexual misconduct** and an external **review of ACU's student accommodation**. These reports have provided, and will continue to provide, an important mechanism through which to track ACU's progress, identify trends and highlight priority areas for improvement.

ACU's Gender Equality, Diversity and Inclusion Staff Experience Survey, which has been conducted every two years since 2021, has played a significant role in informing actions within both our Gender Equality Action Plan and the Athena Swan Action Plan. Insights from these surveys have directly contributed to the development of actions aimed at preventing and responding to gender-based violence, ensuring that staff perspectives and experiences are embedded in our ongoing improvement efforts.

Successful elements of our current approach that will be built upon in implementing the National Code include:

- ACU's current classification of ACU-related sexual harm, family and domestic violence and child abuse via the **Critical Incident Management Policy**. This process provides structure and guidance for ACU to manage incidents in a timely manner, as well as providing transparent communication and coordination among the appropriate personnel to manage risks and threats to the ACU community.
- All commencing ACU students are required to complete two compulsory training modules: the **Respectful Relationships Module** and the **Protecting Our Children: Recognising and Responding to Child Maltreatment Module**. To help assist with completion rates and address key themes of protecting children and respect on campus at ACU, a results hold was introduced for these student modules from Semester 1 2024. The results hold has proven effective in the completion rates of these modules. However, with a trauma-informed lens, ACU will ensure that students who are unable to complete the modules due to past lived experience and/or trauma are provided with an exemption. These exemptions are managed by the Safeguarding and Student Safety Team.
- All ACU staff (including casual staff) are required to complete 'Living the Code', an online training module that informs staff about their rights and obligations in relation to sexual harassment and sexual violence and includes a focus on positive duty under the Sex Discrimination Act.
- The Safeguarding and Student Safety Team delivers targeted training across ACU to build staff and student capability in recognising and responding to gender-based violence. Training covers disclosure response, reporting pathways, respectful relationships, sexual violence, child safety, and family and domestic violence. It promotes awareness of internal and external support services and equips participants with practical skills to support victim-survivors effectively.

- A range of existing policies and procedures that outline how ACU responds to gender-based violence wherever it is experienced by ACU's students and staff, including:
  - **Student Conduct Policy**
  - **Staff Sexual Misconduct Policy**
  - **Prevention and Response to Gender-Based Violence Policy**
  - **Staff Prevention and Response to Gender-Based Violence Procedure**
  - **Student Prevention and Response to Gender-Based Violence Procedure**
- The availability of family violence leave to all ACU staff members.
- Whole-of-organisation plans that address factors that drive and contribute to gender-based violence, including a **Gender Equity, Diversity and Inclusion Framework** and Gender Equality Action Plan (staff), and a **Widening Participation Plan** (students).
- The Safeguarding and Student Safety Advisory Committee (SSSAC) Student Safety Action Plan 2022 – 2025 was designed to promote and facilitate safe, inclusive and equitable student experiences on all ACU campuses and at all university-endorsed activities. This includes programs designed to raise awareness about, and to respond to, sexual harassment and sexual assault. The SSSAC action items address the recommendations of the Australian Human Rights Commission, Universities Australia and the Higher Education Standard 2015: Section 2.3 Wellbeing and Safety – audited by the Tertiary Education Standards Agency (TEQSA). This plan is to be finalised in 2026.
- ACU's Safety Support Network comprises trained staff champions across all campuses who provide trauma-informed support to students disclosing gender-based violence. These staff offer a safe, welcoming environment, raise awareness of reporting pathways, and receive ongoing training in responding to sexual and family violence. The network plays a vital role in supporting students across ACU's geographically dispersed campuses.
- The Student Safety Working Group provides a platform for students to share feedback and co-design initiatives related to safety, gender equity and wellbeing. It enables collaboration with internal stakeholders and has strengthened the integration of student voice into ACU's prevention and response efforts. Opportunities remain to expand student engagement and feedback mechanisms.
- The Safeguarding and Student Safety Team supports students regardless of when or where gender-based violence occurred, recognising its potential long-term impact on academic success. This inclusive approach reinforces that support is available to all students, irrespective of the context of their experience. Future efforts will extend this trauma-informed model to staff, ensuring consistent messaging and support across the university.

In preparation for the National Code, ACU has undertaken several initiatives to strengthen its institutional response, including:

- implementing the Symplicity Advocate CRM to enhance case management support, data collection and trend analysis for targeted prevention
- reviewing and enhancing risk management processes and staff capability
- developing a new overarching **gender-based violence policy**
- partnering with Full Stop Australia to co-design and deliver a comprehensive GBV training program for staff and students, launching in 2026.



# 5. Whole-of-Organisation Gender-based Violence Prevention and Response

The whole-of-organisation plan will be implemented in alignment with the National Higher Education Code to Prevent and Respond to Gender-based Violence (2025) (the National Code) and the Regulatory Guidance for the National Higher Education Code. In implementing this whole-of-organisation plan, ACU will apply the National Code's definitions, evidence-base and key concepts – including trauma-informed practice, people centred responses, confidentiality, safeguarding mechanisms, and evidence informed prevention – while ensuring alignment with ACU's existing mission, values, policies and governance frameworks.

## ADDRESSING THE DRIVERS OF GENDER BASED VIOLENCE

Consistent with the National Code and contemporary evidence, this plan recognises that gender based violence is most often driven by gender inequality, power imbalances and rigid gender norms. Evidence identifies that drivers of gender based violence include:

- condoning of violence against women
- men's control of decision making and limits to women's independence
- rigid gender stereotypes and dominant masculinities that normalise aggression, dominance and control
- peer cultures that reinforce harmful gender norms

ACU recognises that these drivers intersect with other forms of discrimination and structural inequality, contributing to disproportionate harm experienced by women, First Nations people, culturally and linguistically diverse communities, people with disability, and people of diverse sexual orientation and gender identity.

Prevention, education and culture change initiatives implemented under this plan are designed to address these drivers in ways that are inclusive, evidence informed and responsive to ACU's context. Targeted engagement initiatives will help address drivers of gender based violence and support accountability, bystander action and culture change. ACU will implement targeted engagement strategies to increase participation from cohorts with historically lower engagement, including male students and staff, to ensure their perspectives inform ongoing prevention and response initiatives.

## NATIONAL STUDENT OMBUDSMAN FINDINGS

This plan is informed by findings and recommendations of the National Student Ombudsman (NSO), including Can I talk about this? – The use of confidentiality requirements in university complaint handling (2026).

In response to these findings, ACU commits to ensuring that:

1. Confidentiality is applied proportionately and transparently: Confidentiality requirements are designed to protect safety, wellbeing and procedural fairness and will not be applied in ways that silence, disempower or re-traumatise students or staff.
2. Confidentiality does not restrict access to support: Individuals involved in disclosures or formal reports may seek support from trusted persons, health professionals,

legal advisers and external oversight bodies, including the National Student Ombudsman.

3. Confidentiality applies to processes, not lived experience: Confidentiality safeguards the integrity of investigations but does not prevent individuals from speaking about their experience of gender based violence or its impact on them.
4. Clear communication and trauma informed practice: Information about confidentiality, rights, exceptions and support options will be communicated in clear, plain English and reinforced through staff capability building and guidance materials.

Risks, barriers and enablers identified in the NSO's findings are addressed through actions under this Plan relating to governance, policy clarity, training, reporting pathways, case management, staff capability and continuous improvement, including actions set out in the sections on environments, capability building, responses and support services, and evidence and data systems.

## GOVERNANCE AND OVERSIGHT

As of January 2026, ACU has established a comprehensive, whole-of-organisation governance architecture to oversee the implementation of the National Higher Education Code to Prevent and Respond to Gender-based Violence. This governance model will ensure that responsibilities for leadership, operational coordination, consultation and quality assurance are clearly distributed across the university.

The National Code Working Group, co-chaired by the Chief People Officer (CPO) and the Director of Student Experience and Enhancement will be responsible for delivering the National Code Action Plan. This includes coordinating implementation activities, monitoring progress against milestones, and ensuring that actions are aligned with legislative requirements, university policy, and best-practice prevention and response approaches.

To support delivery, the Working Group will be supported by Specialist Advisory Groups, each providing subject-matter expertise, insights and feedback.

Each Advisory Group will include specialist staff, relevant operational units, and student and staff representatives. These groups will play a critical role in advising on evidence-based practice, identifying institutional risks, and ensuring that actions are informed by a diversity of expert perspectives and lived experience insights.

The University maintains strong governance and assurance arrangements to oversee the implementation of this plan and ensure accountability. The governance structure will provide oversight to the integration of the National Student Ombudsman findings including:

- NSO recommendations, systemic insights and complaint trends will be formally reviewed by senior governance committees.
- Time bound action plans will be developed in response to relevant NSO findings and tracked to completion.

- De identified themes from NSO complaints will inform policy reviews, staff training priorities and prevention strategies.
- Progress against NSO related actions will be reported through institutional safeguarding, risk and compliance reporting processes.

### DATA COLLECTION, MONITORING AND CONTINUOUS IMPROVEMENT

The University uses data and evaluation to monitor effectiveness, identify risks and drive improvement. From 2026, the University will strengthen data collection and analysis relating to gender based violence, disclosures, complaints, pathways, timeframes and outcomes to support trend analysis, regulatory reporting, NSO engagement and evidence based improvement. Data will be used ethically and responsibly, with attention to privacy, survivor safety and cultural considerations.

From 2026, ACU will implement enhanced data collection, integration and reporting mechanisms to ensure the plan is informed by current, timely and institution-wide data across both staff and student cohorts.

### RESOURCING AND INSTITUTIONAL COMMITMENT

ACU is committed to ensuring that adequate and sustained resources are allocated to support the implementation of the plan. This includes:

- Staffing allocations across People and Capability Directorate, Education Portfolio, Student Support Services, Digital Services, Properties and Facilities, and Campus Operations to ensure appropriate expertise is available to deliver the Action Plan.

- Dedicated project coordination and analytical support within the Working Group to monitor implementation progress, track compliance and evaluate outcomes.
- Investment in staff capability, including training, leadership development and education programs aligned with the National Code.
- Operational resourcing to support enhanced reporting, case management systems, safe disclosures, data collection and evaluation frameworks.
- Operational resourcing to provide effective oversight of ACU-owned/operated/managed student accommodation.

### STATEMENT ON ENGAGEMENT, CONSULTATION AND EVIDENCE TO INFORM THE WHOLE-OF-ORGANISATION PLAN

The development of the university’s Whole-of-Organisation Gender-based Violence (GBV) Prevention and Response Plan has been underpinned by a program of engagement, consultation and evidence gathering with students, staff and key internal and external partners. In alignment with the National Higher Education Code to Prevent and Respond to Gender-based Violence, the university adopted an inclusive and participatory approach to ensure the plan reflects the lived experience, safety needs and expectations of our community.

Data and insights drawn from consultations, surveys, focus groups, and staff and student feedback mechanisms provided a foundational evidencebase for the plan. These insights were critical in identifying priority areas for action, understanding barriers to disclosure and access to support, assessing perceptions of safety across physical and digital environments, and determining the capability and resourcing needs required to strengthen institutional responses.

### EFFECTIVE GOVERNANCE AND A WHOLE-OF-ORGANISATION APPROACH, PRIORITISING SAFETY AND SUPPORT, IN THE PREVENTION OF AND RESPONSE TO GENDER-BASED VIOLENCE

ACTION	RESPONSIBLE	TIMELINE
Establish a governance structure to oversee and advise on the design, delivery and implementation of ACU’s approach to addressing, preventing and responding to gender-based violence.	Deputy Vice-Chancellor (Education) Chief People Officer	Ongoing
Consider and outline strategic approaches to strengthening gender equity, diversity and inclusion across ACU, ensuring alignment with legislative expectations and emerging best practice, including: <ul style="list-style-type: none"> <li>• Reflect on ACU’s overarching institutional approach to equity, diversity and inclusion (EDI) for both staff and students, drawing on evidence-informed insights to guide potential areas for enhancement.</li> <li>• Examine opportunities to advance a holistic, university-wide commitment to gender equality, including possible pathways for future institutional action and coordinated planning.</li> </ul>	Deputy Vice-Chancellor (Education)	December 2026 December 2027
Develop and implement a whole-of-ACU communication and engagement plan to raise student and staff awareness of: <ul style="list-style-type: none"> <li>• the university’s commitment to preventing and responding to gender-based violence</li> <li>• what constitutes gender-based violence, and behavioural expectations of all members of our community</li> <li>• the available complaint mechanisms for raising concerns about incidents of gender-based violence and support available for staff and students making disclosures</li> <li>• activities that support implementation of the prevention and response plan.</li> </ul>	People and Capability Safeguarding and Student Safety team ACU Communications team	March 2026 and ongoing

ACTION	RESPONSIBLE	TIMELINE
<p>Consider ACU's whole-of-university risk assessment, commissioned by People and Capability, and outline potential strategic responses once the report is delivered in Quarter 1, 2026.</p> <ul style="list-style-type: none"> <li>Identify broad directions for future action informed by the assessment's findings and aligned with ACU's institutional priorities.</li> <li>Highlight possible pathways for coordinated university-wide implementation, ensuring ACU is well positioned to respond to the recommendations in an effective and timely manner.</li> </ul>	Chief People Officer	<p>December 2026</p> <p>December 2026</p>

### ENVIRONMENTS ARE SAFE, AND SYSTEMS CONTINUOUSLY IMPROVE TO PREVENT AND RESPOND TO GENDER-BASED VIOLENCE

ACTION	RESPONSIBLE	TIMELINE
<p>Build institutional capability in applying and using new and updated gender-based <b>violence policies</b> and <b>staff procedures</b> and <b>student procedures</b>.</p> <ul style="list-style-type: none"> <li>Develop and deliver awareness campaigns for all staff and students.</li> <li>Develop and deliver tailored training for managers and student leaders.</li> </ul>	<p>Vice-Chancellor and President</p> <p>Deputy Vice-Chancellor (Education)</p> <p>Deputy Vice-Chancellor (Corporate)</p> <p>Chief People Officer</p>	<p>January 2026 and ongoing</p> <p>December 2026</p>
<p>Create a regular review cycle of gender-based violence prevention and response policies and procedures.</p>	Chief People Officer	Ongoing
<p>Improve safety of ACU campuses (including student accommodation) through auditing campus environments, spaces and facilities, and implementing recommended upgrades.</p>	Deputy Vice-Chancellor (Corporate)	December 2026
<p>Strengthen the safety, respect and inclusivity of all learning environments – on-campus, online and off-campus – by assuring learning experiences that proactively prevent GBV, uphold student and staff wellbeing, and support safe engagement across all modes and settings.</p>	<p>Provost</p> <p>Executive Deans</p>	December 2027
<p>Introduce gender equity measures for the student cohort to help address the underlying drivers of gender-based violence.</p>	Safeguarding and Student Safety Team	December 2026

### BUILD KNOWLEDGE AND CAPABILITY TO SAFELY AND EFFECTIVELY PREVENT AND RESPOND TO GENDER-BASED VIOLENCE

ACTION	RESPONSIBLE	TIMELINE
<p>Deliver a comprehensive, ongoing prevention and response education and training program.</p> <ul style="list-style-type: none"> <li>Include tailored content to meet the needs and requirements of specific audiences (eg student accommodation, placements).</li> <li>Ensure appropriate resourcing is in place to meet the National Code's education and training and prevention program requirements.</li> </ul>	<p>Deputy Vice-Chancellor (Education)</p> <p>Chief People Officer</p>	2026 and ongoing
<p>Develop and deliver a targeted prevention initiatives program that is evidence-based and addresses the identified and actual gender-based violence risks to particular cohorts across the university.</p> <ul style="list-style-type: none"> <li>Deliver values-based messaging training for all staff involved in developing, approving and distributing messaging around gender-based violence and gender equity.</li> <li>Develop and implement a values-based, trauma-informed communications and engagement plan to promote and provide key messaging across the whole university.</li> </ul>	Chief People Officer	<p>December 2026 and ongoing</p> <p>December 2026</p> <p>Ongoing</p>

ACTION	RESPONSIBLE	TIMELINE
<p>Identify and scope the implementation of programs to support staff and students in upskilling and lifting capability.</p> <ul style="list-style-type: none"> <li>Explore the introduction of a mentoring/coaching program to upskill facilitators of staff workshops.</li> <li>Explore the introduction of a peer-led training program for students.</li> </ul>	Deputy Vice-Chancellor (Education) in consultation with People & Capability	<p>June 2026</p> <p>June 2027</p>
<p>Implement and monitor the use of risk assessments and provide support for those responsible for conducting risk assessments and responding to formal reports of gender-based violence.</p> <ul style="list-style-type: none"> <li>Ensure all staff members who conduct risk assessments have the required expertise and competency.</li> <li>Monitor implementation of new risk assessment tool.</li> </ul>	Deputy Vice-Chancellor (Education) Chief People Officer	January 2026 and ongoing

## RESPONSES AND SUPPORT SERVICES ARE SAFE AND PERSON-CENTRED

ACTION	RESPONSIBLE	TIMELINE
<p>Utilise relevant staff and student insights and data to ensure there is appropriate resourcing in teams that provide support services for disclosures and formal reports.</p> <ul style="list-style-type: none"> <li>Monitor resourcing with consideration of: <ul style="list-style-type: none"> <li>separation of discloser/respondent support person</li> <li>capacity to provide consistent, high-quality and trauma-informed care</li> <li>safety and psychological wellbeing of staff receiving disclosures and formal reports</li> <li>capacity to meet anticipated increase in disclosures and reports with the introduction of the National Code.</li> </ul> </li> </ul>	Deputy Vice-Chancellor (Education) Deputy Vice-Chancellor (Corporate)	June 2026 and ongoing
<p>Review options for providing a whole-of-organisation approach to supporting staff and students affected by gender-based violence that is centralised, streamlined and integrated.</p> <ul style="list-style-type: none"> <li>Develop a prominent Safety@ACU space on the ACU homepage that serves as the central landing page for information, reporting options, and support related to gender-based violence for staff and students.</li> <li>Scope establishment of an integrated support service that covers both staff and students.</li> </ul>	Deputy Vice-Chancellor (Education) Chief People Officer	<p>January 2026</p> <p>December 2026</p>
<p>Provide strategic oversight of ACU's support services to ensure alignment with the National Higher Education Code to Prevent and Respond to Gender-based Violence, including ongoing evaluation of service effectiveness to inform continuous improvement and future institutional planning.</p>	Deputy Vice-Chancellor (Education)	December 2028 and ongoing
<p>Develop and strengthen options for support, recovery and healing.</p>	Deputy Vice-Chancellor (Education) Deputy Vice-Chancellor (Corporate)	December 2027
<p>Strengthen safety and support for staff members disclosing gender-based violence where a student(s) is the alleged perpetrator.</p>	Chief People Officer	June 2026

## GENDER-BASED VIOLENCE RESPONSES ARE SAFE AND TIMELY

ACTION	RESPONSIBLE	TIMELINE
Implement a whole-of-organisation case management system to ensure a consistent approach to managing disclosures of gender-based violence.	Deputy Vice-Chancellor (Education) Deputy Vice-Chancellor (Corporate)	January 2026
Ensure that all processes relating to gender-based violence are identified, updated and provide a clear and consistent approach across the whole university.	Deputy Vice-Chancellor (Education) Chief People Officer	June 2026 and ongoing
Ensure ACU's responses to disclosures and formal reports are proportionate and consistent across teams. <ul style="list-style-type: none"> <li>• Create guidelines that identify appropriate responses for different types of incidents and factors to consider in choosing and implementing a response.</li> <li>• Design and deliver training to relevant teams on using new guidelines.</li> </ul>	Deputy Vice-Chancellor (Education) Chief People Officer	December 2026
Strengthen safety and support for students in gender-based violence disciplinary procedures. <ul style="list-style-type: none"> <li>• Change structure of disciplinary panels to remove student representatives where appropriate and protect them from vicarious trauma.</li> <li>• Ensure Student Conduct is resourced to provide support (by different staff members) for both disclosers and respondents.</li> </ul>	Deputy Vice-Chancellor (Education)	June 2027

## USE EVIDENCE TO APPROACH, MEASURE CHANGE AND CONTRIBUTE TO THE NATIONAL EVIDENCE-BASE

ACTION	RESPONSIBLE	TIMELINE
Monitor implementation of the new case management system and implement continuous improvement to support data collection, reporting and evidence-based continuous change processes.	Deputy Vice-Chancellor (Education) Deputy Vice-Chancellor (Corporate) Chief People Officer	December 2026 and ongoing
Establish processes to ensure ACU's approach to preventing and responding to gender-based violence is evidence-based. <ul style="list-style-type: none"> <li>• Develop a process to ensure disclosure and formal report data and learnings from related processes inform improvements to the university's GBV-related practices and processes.</li> <li>• Establish protocols to support evidence-based decision-making for relevant delegated officers of the university.</li> </ul>	Deputy Vice-Chancellor (Education) Deputy Vice-Chancellor (Corporate)	June 2026 and ongoing
Establish a consistent and transparent whole-of-organisation data collection, collation and reporting process to include both staff and student data. <ul style="list-style-type: none"> <li>• Establish an appropriate, streamlined process for reporting under the National Code that outlines data requirements required by the Department of Education.</li> <li>• Establish a process with timelines to ensure data collection, data collation and data analysis is undertaken to inform continuous improvement.</li> </ul>	Deputy Vice-Chancellor (Education) Chief People Officer Deputy Vice-Chancellor (Corporate)	December 2027

## STUDENT ACCOMMODATION IS SAFE FOR ALL STUDENTS AND STAFF

ACTION	RESPONSIBLE	TIMELINE
<p>Strengthen perceived safety in student accommodation.</p> <ul style="list-style-type: none"> <li>• Undertake a comprehensive review of safety at all student accommodation locations (including potential utilisation of CCTV etc).</li> <li>• Develop and deliver targeted interventions for priority cohorts identified through feedback and evaluation processes, to increase feelings and experiences of safety in student accommodation.</li> </ul>	<p>Director, Student Experience and Enhancement</p>	<p>December 2026 and ongoing</p>
<p>Strengthen procedures and practices for managing gender-based violence disclosures, ensuring consistent action and support is provided across all sites and staff members.</p> <ul style="list-style-type: none"> <li>• Develop formal procedures for support and safety planning, and management of alleged perpetrators in student accommodation.</li> <li>• Ensure availability of on-call person and/or referral to external services to ensure risk assessments are completed within 48 hours.</li> </ul>	<p>Director, Student Experience and Enhancement</p>	<p>December 2026</p>
<p>Ensure gender-based violence prevention and response information is provided extensively across student accommodation properties.</p>	<p>Director, Student Experience and Enhancement</p>	<p>December 2026</p>
<p>Strengthen student accommodation training.</p> <ul style="list-style-type: none"> <li>• Ensure all training delivered to student accommodation staff, including Residential Advisors (RAs), is tailored to the student accommodation environment and includes trauma-informed practice.</li> <li>• Deliver annual training to at least one representative from each external/affiliated accommodation provider, which includes up-to-date information on student supports, reporting, data sharing and incident response.</li> </ul>	<p>Director, Student Experience and Enhancement</p>	<p>June 2026 and ongoing</p>
<p>Develop procedures to ensure affiliated student accommodation providers employ good practice in preventing and responding to gender-based violence.</p> <ul style="list-style-type: none"> <li>• Update current agreements with all affiliated purpose-built student accommodation providers to meet the requirements set out in Standards 7.2 to 7.8.</li> <li>• Create an affiliation or marketing agreement to be offered to all the colleges affiliated with ACU, and a procedure to manage refusals.</li> <li>• Develop a procedure for submission and review of the Whole-of-Organisation Prevention and Response Plan of all controlled and affiliated accommodation providers.</li> </ul>	<p>Director, Student Experience and Enhancement</p>	<p>March 2026 and ongoing</p>

# 6. Outcomes framework

The Outcomes Framework is designed to measure the extent to which ACU's prevention and response actions are experienced by staff and students as safe, person centred, trauma informed and effective across all university environments, including student accommodation. Outcomes and indicators move beyond activity based measures to assess impact, quality and lived experience, with a particular focus on whether systems reduce harm, support recovery, and build trust and confidence over time. The outcomes

framework includes indicators relating to:

- Safe and proportionate confidentiality practices including safety, risk management and immediate response
- Clarity and trauma informed communication with staff and students
- Access to internal and external support pathways
- Capability of ACU staff including Student Accommodation
- Confidence and trust in the disclosure and complaint process

- Governance, monitoring, reporting and accountability which are driven by data, insights and evidence-based decision making

These indicators support continuous improvement by enabling ACU to identify barriers, risks and unintended impacts within its systems, and to strengthen responses in ways that prioritise safety, dignity, healing and educational continuity.

Outcomes will be underpinned by the establishment of clear baselines and

measurable targets, enabling the University to track progress over time and demonstrate continuous improvement in gender based violence prevention and response. Outcomes will be reviewed regularly and informed by:

- Student and staff feedback
- NSO findings and sector trends
- Regulatory expectations under the National Code

Baseline measures established in 2026 will be used to set specific performance targets for subsequent reporting periods.

OUTCOME	SUB OUTCOMES	INDICATORS	MEASURES (OF IMPACT OR PROGRESS)
<b>Effective governance and a whole-of-organisation approach, prioritising safety and support, in the prevention of and response to gender-based violence</b>	Strengthened governance and transparent oversight of gender-based violence prevention and response	Well-functioning governance	<ul style="list-style-type: none"> <li>• Taskforce established and operationalised in accordance with Terms of Reference</li> <li>• Meeting discipline and participation</li> <li>• Per cent of actions completed on time and recommendations implemented</li> <li>• Maintenance of required representation</li> <li>• Annual compliance and effectiveness review</li> </ul>
	Whole-of-organisation coordination and leadership accountability embedded	Clear leadership roles and accountability	<ul style="list-style-type: none"> <li>• Leadership roles and responsibilities updated in position descriptions with associated KPIs in annual performance plans</li> <li>• Per cent of organisational units with defined EDI contact points</li> <li>• Per cent of actions completed on time</li> <li>• Endorsement date of integrated GEAP</li> <li>• Alignment score with GEDI Framework/National Code</li> </ul>
	Informed, capable senior leadership driving culture and systems change	GBV-informed leadership and decision making	<ul style="list-style-type: none"> <li>• Per cent of leaders trained and re-trained annually</li> <li>• Pre/post knowledge scores</li> <li>• Leaders' self-reported confidence shift</li> </ul>

OUTCOME	SUB OUTCOMES	INDICATORS	MEASURES (OF IMPACT OR PROGRESS)
<b>Environments are safe, and systems continuously improve to prevent and respond to gender-based violence</b>	Coherent, trauma-informed policy and system architecture embedded in BAU	Consistent trauma-informed practices and policies	<ul style="list-style-type: none"> <li>Per cent of reach and engagement by students and staff in trauma-informed initiatives, trainings, communications and practices</li> <li>Training quality and knowledge check score</li> <li>Per cent of training completion</li> <li>Number of policies updated</li> <li>Plain English reading score</li> <li>Alignment with accessibility guidelines (eg WCAG 2.1)</li> </ul>
	Safer physical and programmatic environments across campuses and placements	Safe physical environments	<ul style="list-style-type: none"> <li>Per cent of identified physical risks mitigated within timeline</li> <li>Decreased incident rates in after-hours periods and identified hot spots</li> <li>Evaluation of campus environments that meet safety, accessibility and trauma-informed design standards</li> </ul>
		Safe programmatic environments	<ul style="list-style-type: none"> <li>Per cent of policies that meet trauma-informed criteria</li> <li>Per cent of staff and students reporting a sense of safety in learning environments, including placements</li> </ul>
<b>Build knowledge and capability to safely and effectively prevent and respond to gender-based violence</b>	Organisation-wide capability to prevent and respond to gender-based violence is lifted and sustained	Strengthened GBV prevention and response capability	<ul style="list-style-type: none"> <li>Per cent of staff/students trained</li> <li>Pre- and post-training knowledge scores</li> <li>Number of specialised staff trained in GBV presentation and response practices</li> <li>Compliance rate with GBV response protocols</li> <li>Per cent of disclosures managed within timeframes</li> <li>Per cent of position descriptions that include GBV prevention and response capability elements</li> </ul>
	Values-aligned, evidence-informed messaging and prevention is embedded across ACU	Evidence-informed messaging practices	<ul style="list-style-type: none"> <li>Number staff trained</li> <li>Message audit results</li> <li>Staff confidence shift</li> <li>Number of campaigns delivered</li> <li>Campaign reach/engagement</li> <li>Incident or help-seeking trends in target cohorts, hotspot areas etc</li> <li>Awareness survey result</li> </ul>
	Resourcing and structures enable scalable, high-quality training and support	Adequate resourcing	<ul style="list-style-type: none"> <li>Per cent of required roles filled</li> <li>Number of trained facilitators or peer educators available to scale training delivery</li> <li>Per cent of learner satisfaction</li> <li>Knowledge check scores</li> <li>Annual training and refresher cycle established and implemented</li> </ul>

OUTCOME	SUB OUTCOMES	INDICATORS	MEASURES (OF IMPACT OR PROGRESS)
<b>Responses and support services are safe and person-centred</b>	Safe, person-centred support minimises re-traumatisation	Timely first contact and risk assessment	<ul style="list-style-type: none"> <li>• Per cent of survivors reporting not repeating themselves multiple times</li> <li>• Per cent of cases where warm referrals were used (instead of handoffs)</li> <li>• Per cent of cases where safety planning was completed</li> <li>• Number of avoidable system interactions per case</li> <li>• Number of follow-up check-ins completed within agreed timeframes</li> <li>• Completion of tailored support plan per case</li> </ul>
	Integrated referral pathways offer appropriate, evidence-aligned options	Clear, consistent referral pathways	<ul style="list-style-type: none"> <li>• Average time to connect referee with partner organisation</li> <li>• Per cent of warm referrals used</li> <li>• Number of disclosers opting for restorative justice</li> <li>• Participant-safety outcomes and satisfaction</li> </ul>
	Sustainable capacity to deliver high-quality support at scale	Immediate staffing increase in relevant teams	<ul style="list-style-type: none"> <li>• Per cent of required support roles filled</li> <li>• Staff-to-cases ratio remains within safe limits</li> <li>• Staff turnover rates in key support roles</li> <li>• Support services and platforms meet demand</li> <li>• Time to first contact with discloser/respondent</li> <li>• Support satisfaction index</li> <li>• Number of clinical supervision sessions</li> <li>• Annual service review to inform practices</li> </ul>
<b>Gender-based violence responses are safe and timely</b>	Consistent, timely case management across ACU	Cases are triaged and progressed through a unified workflow	<ul style="list-style-type: none"> <li>• Per cent of cases finalised within 45 business days</li> <li>• User satisfaction with case management system</li> <li>• Per cent of case files meet quality standards</li> <li>• Biannual case file audits</li> </ul>
	Accessible, clear reporting and communication for students, staff and the public	People know where and how to report	<ul style="list-style-type: none"> <li>• Number of accessible reporting channels available</li> <li>• Per cent of reporting pathways meet accessibility standards</li> <li>• Average triage time</li> <li>• Reporting experience scores</li> <li>• Plain English readability scores for forms and communication materials</li> </ul>
	Capability uplift and process alignment for misconduct pathways	Expanded training delivered to misconduct process staff	<ul style="list-style-type: none"> <li>• # of staff trained</li> <li>• Training participant feedback</li> <li>• Knowledge increase pre/post training</li> <li>• Confidence improvement pre/post training</li> <li>• Process-adherence audit findings</li> </ul>

OUTCOME	SUB OUTCOMES	INDICATORS	MEASURES (OF IMPACT OR PROGRESS)
<p><b>Use evidence to approach, measure change and contribute to the national evidence-base</b></p>	<p>Integrated, compliant evidence system for gender-based violence monitoring and reporting</p>	<p>On-time, complete National Code submissions</p>	<ul style="list-style-type: none"> <li>• Case management system meets reporting and UX requirements</li> <li>• Data quality (completeness, accuracy) rating improves annually</li> <li>• Reliable data dashboards in place</li> <li>• % of key decisions reference data or evidence</li> <li>• Processes established for routine evidence reviews</li> <li>• Annual GBV insights reports produced and considered by Taskforce</li> <li>• # of programs or initiatives modified based on findings</li> </ul>
	<p><b>Student accommodation is safe for all students and staff</b></p>	<p>Rapid, trauma-informed risk management in student accommodation</p>	<p>Timely risk identification and response</p>
		<p>Trauma-informed practices consistently applied</p>	<ul style="list-style-type: none"> <li>• # of RAs/coordinators trained</li> <li>• Confidence/self-efficacy scores pre/post training</li> <li>• Compliance with trauma-informed procedures</li> </ul>
<p>Safer, evidence-informed living environments tailored to resident needs</p>		<p>Safe living environments</p>	<ul style="list-style-type: none"> <li>• Resident safety perception uplift</li> <li>• Program participation rates/campaign engagement rates</li> <li>• Incident trends in target cohorts</li> </ul>
<p>Accessible, sustainable support pathways, including secure housing options</p>		<p>Clear, accessible and reliable support available</p>	<ul style="list-style-type: none"> <li>• Resident recall of reporting/support information</li> <li>• Visibility checks of reporting/support information</li> <li>• Usage of reporting/support channels</li> <li>• # of students supported with FV accommodation</li> <li>• Average length of stay in FV accommodation</li> <li>• Safety outcomes</li> <li>• Occupancy rates in single-gender accommodation</li> <li>• Incident rates by accommodation type</li> </ul>

# 7. Gender Equality Action Plan/s

If you have an existing Gender Equality Action Plan/s, complete the following table

<b>Name and tenure:</b>	<b>Gender Equality Action Plan 2022-2025</b>
<b>Authorising agency:</b>	Commission for Gender Equality in the Public Sector (Vic)
<b>Revision commitments:</b>	The next scheduled revision is due for submission to the Commission for Gender Equality in the Public Sector Committee on 1 May 2026.



# Whole-of-Organisation Gender-based Violence Prevention and Response Plan and outcomes framework

1 January 2026 – 31 December 2029