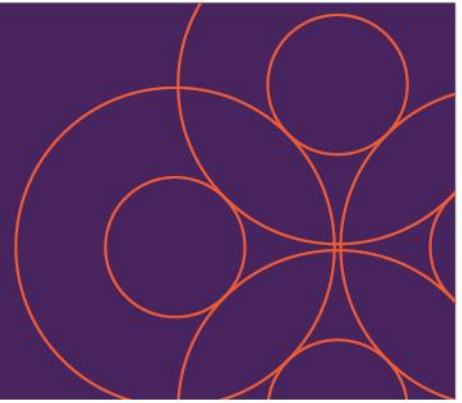




Transcript

National Higher Education Code to Prevent and Respond to Gender-Based Violence

NUHEP Whole-of-Organisation Prevention and Response Plans – information session

October 2026

The transcript of this (and all further webinars) webinars should be read with the Universities Accord (National Higher Education Code to Prevent and Respond to Gender-based Violence) Act 2025 (the Act) and the National Higher Education Code to Prevent and Respond to Gender-based Violence 2025 (the National Code), which are the primary sources of requirements with which providers must comply. To the extent there is any inconsistency between the transcript of the webinar and the Act and the National Code, the Act and the National Code will prevail. The transcript of the webinar is intended to provide general guidance only and is not intended as, and should not be relied on, as legal advice. Providers should seek their own legal advice to understand their obligations under the Act and the National Code.

Presented by:

- Michele Clark - Assistant Secretary, Higher Education Gender-based Violence Regulator, Department of Education
- Kurt Carmichael - Director, Regulatory Operations Team, Higher Education Gender-based Violence Regulator, Department of Education
- Penny Huisman - Head, Safer Communities, University of New South Wales
- Nikki Rillstone - Head of Safer Communities Unit, Central Queensland University
- Jonathan Powles - Vice-president of Student Success, Central Queensland University

[Opening visual of slide with text saying 'Australian Government with Crest (logo)', 'Higher Education', 'Gender-based Violence Regulator', 'NUHEP Whole-of-Organisation Prevention and Response Plans', 'Information session']

[The visuals during this webinar are of each speaker presenting in turn via video, with reference to the content of a PowerPoint presentation being played on screen]

Michelle Clark:

Good morning everybody. My name is Michelle Clark and I'm the Assistant Secretary for the Higher Education Gender-Based Violence Regulator. So, thank you so much for coming along today for our NUHEP Whole of Organisation Prevention and Response Plans Information Session.

I'd like to start by acknowledging the traditional custodians of country throughout Australia and acknowledge their continuing connection to land, waters and community. I'm joining from beautiful Wurundjeri country and pay my respects to the people of the Kulin Nation, Elders past and present. And I extend my respects to any Aboriginal or Torres Strait Islander people joining us today. I also want to acknowledge the strength, courage and resilience of those who have experienced gender-based violence. Their lived experiences and tireless advocacy has been instrumental in shaping the National Code.

So I'm so pleased to have this opportunity to talk to you about the commencement of the National Higher Education Code to Prevent and Respond to Gender-based Violence for the non-university higher education sector from January 1st next year. In particular today we're focusing on your first regulatory task of submitting a whole of organisation prevention and response plan and outcomes framework. So today I'll take you through some key insights from our initial assessment of Table A and B higher education providers' whole of organisation prevention and response plans and outcomes frameworks which will assist you to develop your submissions. So while these assessments were undertaken for Table A and B providers' plans the findings will provide valuable insight into the implementation of the National Code and highlight lessons that are directly relevant to NUHEPs as commencement approaches on the 1st of January.

I'm joined today by several wonderful people, including Kurt Carmichael, the Director of our Regulatory Operations Team, who will walk you through the mandatory template for your whole of organisation plans. We're also incredibly lucky to be joined by Nikki Rillstone from Central Queensland University and Penny Huisman from University of New South Wales, who have agreed to come very kindly to share their experiences and insights from their planned submission. And finally we will leave some time today for questions and discussion. So a recording of today's session and any supporting materials will be made available after the webinar as well.

So the National Code. I'll give you a little bit of context and why it matters. As you are aware the National Higher Education Code to Prevent and Respond to Gender-based Violence commenced for table A and B providers on the 1st of January 2026 and will come into effect for non-university providers on the 1st of January 2027.

I'll keep this bit brief as I think most of you will be familiar with the National Code's requirements. For those of you who would like to revisit the detail of any of the seven standards we do have a range of recorded webinars available on our website. We've also published detailed regulatory guidance and guidance on developing a plan, acknowledging that each provider will need to consider this in their own context and specific circumstances.

So at its core the National Code exists because the prevalence of gender based violence in higher education remains unacceptably high. These are not isolated incidents. They reflect systemic issues that require systemic responses. The National Code establishes seven mandatory standards that require providers to take a whole of organisation approach to prevention and response. Importantly it's not about responding when incidents occur – sorry. It's not only about responding when incidents occur. It also requires providers to address the drivers of gender-based violence and embed prevention across their institutional culture, systems and practices.

So what we've learned through the assessment of whole of organisation prevention and response plans for table A and B universities is that implementation requires much more than policies and procedures. It requires organisational commitment, capability building, clear governance, and a willingness to continue to strengthen practice. Today's discussion will focus on the insights emerging from that work and what they may mean for NUHEPs as you prepare for and continue on your implementation journey.

So the National Code provides the framework for the change we need to see across the higher education sector, but achieving that change requires oversight, accountability and support for implementation. The GBV regulator, which I have the privilege of leading, operates within a legislative and regulatory framework with powers to promote, monitor and enforce compliance with the National Code. We regulate to achieve outcomes, not compliance for compliance sake. We regulate to minimise harm, improve outcomes and support meaningful change in how providers prevent and respond to gender-based violence. Our role is to hold the higher education providers accountable for meeting the requirements of the National Code while applying our principles of regulatory necessity and proportionate regulation. Providers are expected to take proactive steps to strengthen the systems, governance, capability and resources needed to create safer environments for students and

staff. And we work with providers to build understanding of the National Code's requirements, support voluntary compliance and identify emerging risks through information, data and intelligence. Where regulatory action is required, we will act proportionately and focus on areas of greatest impact and risk.

The goal is the development of safer, more effective and more accountable systems for preventing and responding to gender-based violence and everything we do as a regulator is orientated towards that outcome.

And I want to be clear that our approach to considering NUHEPs plans will be proportionate, risk-based and outcomes focused. Our intention is to support voluntary compliance and meaningful implementation, not to penalise providers who are genuinely working towards implementing the National Code. We really do recognise the diversity of contexts across this sector and our consideration of plans will reflect that. So now I'll hand over to Kurt, the head of our Regulatory Operations to walk you through the Whole of Organisation Prevention and Response Plans and Outcomes Framework. Thanks Kurt.

Kurt Carmichael:

Thanks so much Michelle and hi everyone. As Michelle mentioned I'm going to now focus in on the Whole of Organisation Prevention and Response Plan and Outcomes Framework. So the plan is a key strategic document that outlines how each provider will implement the National Code through a comprehensive, evidence-based, and risk-formed approach to preventing and responding to gender-based violence. It requires providers to consider their specific context to identify relevant drivers of gender-based violence, key risks, barriers, and enablers, and clearly outline actions in response to these. The Outcomes Framework requires providers to consider how they're going to measure and track progress against the actions of their plan and ensure that the governing body have a clear mechanism for overseeing implementation.

A whole of organisation approach requires coordinated and reinforcing strategies across all areas of a provider's operations, led by leadership and supported through governance, systems, policies, practices and cultures. Importantly the plan is not a set and forget. It should be a living document which is reviewed and updated throughout its tenure to respond to emerging risks and changes in the provider's operating environment.

So once we receive these plans in January 2027 the GBV Regulator will review the plans to identify any key issues or areas of persistent non-compliance across the sector. In particular we'll focus on ensuring that providers have actively engaged with the process of undertaking

a whole of organisation assessment to identify their specific risks, barriers and enablers, ensure that they've undertaken a review of their responses to disclosures and formal reports of gender-based violence to identify where there are gaps and opportunities, and ensure that they've set out clear actions to respond to the findings of the whole of organisation assessment and the systemic review, including identifying appropriate timeframes and resources for implementation.

Following this review process the Regulator will provide sector wide feedback and insights to inform uplift and improvement of the plans where appropriate, and we expect all providers to action this feedback as appropriate to ensure their plan demonstrates sufficient compliance. I really want to acknowledge the complexity of the National Code and that capability across the sector is still developing. Consistent with our outcomes focused approach which Michelle mentioned earlier, we'll adopt an educative approach to reviewing the plans. Providers are expected to demonstrate a clear understanding of what is required of them and meaningful progression towards full implementation of the National Code.

So ahead of the mandatory submission of your plans in January 2027 I want to share some of the findings of our assessment of university plans in 2026 which might provide some useful insights. So the Regulator implemented a phased approach to reviewing the university's plans and with a particular focus on key foundational and priority requirements which we considered critical to the successful implementation of the National Code. Our assessment identified several recurring themes and we're going to talk through some of those over the next few slides. But one of the clearest observations from our initial assessment process was the importance of undertaking a genuine assessment of organisational risks, barriers and enablers. So providers that clearly articulated the factors affecting prevention and response efforts were generally better able to identify targeted actions for improvement. By contrast plans that focused primarily on describing existing activities often found it more difficult to demonstrate how priorities had been identified or how activities would address specific risks and barriers going forward.

Some examples of commonly identified risks include limitations with existing systems, multiple reporting pathways causing confusion for students and staff, inadequate record keeping, and stronger focuses on response, but inadequate focus on prevention. These findings typically enabled providers to identify really practical actions to strengthen their approach going forward. Importantly – and I want to be really clear on this – effective actions don't need to be complex or resource intensive. Some of the best plans that we saw identified relatively simple risks and developed proportionate and achievable actions in

response to these. I'll hand back over to Michelle who's going to talk through some more of our insights.

Michelle Clark:

Thanks Kurt. So leadership and governance. The transformational change required to address gender-based violence in higher education must be led from the top. Prevention and response must be a core strategic and operational priority with action taken across every level of a provider's organisation. We were pleased to see Table A and B providers welcome the introduction of the National Code and noted the vital role their institutions play in driving attitudinal change and better outcomes. Most plans demonstrated a high level of commitment to staff and student safety, with many including clear statements from the Vice Chancellor or governing body about the provider's commitment to preventing and responding to gender-based violence and linking to their organisational goals and values.

For NUHEPs the equivalent leadership signal will look different. It may come from a CEO, a board chair, a principal or an owner-operator. What we want to see is that the person or body with ultimate accountability for the organisation has clearly and publicly committed to this work and that this commitment is reflected in governance, resourcing and culture. Strong plans demonstrated progress towards integrating gender-based violence prevention and response into existing systems and structures. Examples included gender-based violence risk oversight and reporting on National Code progress being formally assigned to the governing body, including the integration of gender-based violence risks into enterprise risk processes with regular reviews. Some plans included actions to align gender-based violence policies with the National Code and integrate these policies into work health and safety frameworks or codes of conduct. Some plans also included a clear approach to building organisational capability through assessment of existing capability and the development of tailored training and development plans.

Another notable area that providers are required to respond to gender-based violence is wherever it is experienced. However this was not explicitly stated in many plans. So this is a unique and very important aspect of the National Code. So clearly communicating this commitment can help ensure communities understand that support and responses will be available regardless of where an incident takes place, including in off campus settings, at home or online.

For NUHEPs particular consideration should be given to environment specific to their context, such as placements, work integrated learning and off-campus environments.

Students remain entitled to support regardless of where an incident occurs. Effective implementation of the National Code requires leadership commitment to translate into governance oversight, accountability, capability building and continuous improvement.

In our assessment of the plans we wanted to see that providers had conducted a whole of organisation assessment incorporating student accommodation they own or operate, identifying systemic risks, enablers and barriers to preventing gender-based violence, along with associated actions and a systemic review and analysis of their responses to disclosures and formal reports. Plans that did well in this area included clear, short, medium and long term actions to improve prevention and response stemming from a comprehensive organisational assessment and gap analysis. It really required a sense of vulnerability and a critical eye on what the organisation is currently doing and where improvements can be made. Some providers also clearly demonstrated in their plans that they had reviewed their own records relating to disclosures and formal reports to identify trends and then included specific actions such as developing new gender-based violence risk assessment tools, reviewing complaints mechanisms, updating procedures and ensuring that there is a clear front door for disclosures and formal reports. Leading provider plans also included comprehensive context about the provider's profile, including student and staff demographics, to enable us as the Regulator to determine whether the plan accurately reflected the needs of the provider's community.

So we consider the inclusion of contextual detail extremely important, noting the diversity within the NUHEPs sector. A provider with a predominantly international student cohort for example will have a fundamentally different risk profile to one delivering primarily online or one operating on a residential campus. So the template we've developed is designed to help you capture that context in a structured way. There is no single right answer, but there must be a clear and honest picture of your community.

We also saw that a number of plans had a strong focus on the student population but were not as comprehensive on staff related prevention and response mechanisms. Given that the national code also applies to staff, plans should clearly address staff experiences and needs, noting that staff can face distinct risks associated with workplace power imbalances and academic hierarchies. For smaller NUHEPs in particular there is an additional complexity worth naming. Staff in small organisations often wear multiple hats. A staff member may be both the designated disclosure point and a close colleague of the respondent. This creates real risks around conflict of interest, confidentiality and procedural fairness. If this is the case your plan should acknowledge these dynamics and include clear arrangements for managing them, for example referral pathways to external services or arrangements with a

partner organisation. The National Code also requires plans to be collaboratively designed with students and staff, as well as to include clear actions to undertake further engagement to support ongoing review and refinement of plans.

So what does the whole of organisation approach mean for a NUHEP? Broadly a whole of organisation approach means that change is championed from the top, governing bodies assume accountability and proactively manage gender-based violence risk and structures, norms and practices that contribute to inequality and compound harm are identified and addressed. Policies and procedures enable a consistent, coordinated and accountable approach to preventing and responding to gender-based violence, and systems and infrastructure for safety and support are trauma informed, person centred and appropriate for the student and staff cohort. Safe, inclusive and respectful teaching and learning environments are fostered with curriculum, educational practices and all other activities promoting equity, inclusion and respectful behaviours and supporting the participation of advancement of women and LGBTIQ+ people. Business operations, resource allocation, and procurement arrangements align with the National Code and support implementation. And partnerships with community organisations and industry partners support evidence informed prevention, response referral pathways, capability development, and continuous improvement.

So the mandatory NUHEP template which was published in August and emailed out to all providers was developed in response to the lessons we learnt through reviewing the sectors Table A and B submissions. Those submissions highlighted a need for greater consistency in how providers assess risks, identify actions, and demonstrate that whole of organisation approach. So we also heard that providers really wanted greater clarity on what information was needed and how best to demonstrate the whole of organisation approach. And the template is intended to support NUHEPs by providing a clear, structured format that is proportionate to your context and scale while also enabling a more consistent and streamlined assessment process across the sector.

I'll now hand back to Kurt who'll take you through some of the technical aspects of submitting your plans as well as walking through the template. Thanks Kurt.

Kurt Carmichael:

Thanks so much Michelle. Now onto the really exciting stuff as we prepare for plans and submissions. So as Michelle's highlighted we really do recognise that the non-university higher education sector is quite distinct from universities with different operating

environments, levels of maturity and organisational capacity and unique implementation challenges. And that's really what this alongside our kind of regulatory approach of being proportionate and addressing risk really led to us developing this revised template, which more clearly sets out the expected level of detail for each section of the plan. It provides greater clarity around the whole of organisation assessment and sources of evidence to better support development of clear and effective actions and outcomes. And it addresses some of the specific gender equality action plan requirements.

As Michelle mentioned the final template was published on the 19th of August on our website and it is mandatory for all non-university higher education providers, except in a small number of cases where an exception applies. And I'll talk a little bit more about these circumstances later.

The template has been designed to help providers capture their context in a structured and consistent way. At its core the plan should present a clear, honest, and evidence informed picture of your community, your environment, and the factors that shape the risks and responses relevant to your institution. As Michelle mentioned earlier the purpose is not to present an idealised view of your organisation, but to provide a realistic assessment that can support meaningful actions and continuous improvement.

The template has also been developed to promote consistency across the sector and to support providers in addressing each of the requirements under Standards 1.4, 1.6 and 1.7 of the National Code. As you work through the sections you'll see that the template includes prompts and guidance intended to help you understand what each requirement is looking for and the type of information that may be relevant to include. While the design and the structure of the template must be used when developing and submitting your plan, providers can adjust the visual design and layout when they publish the final plan on their website provided that you retain all of the content itself. We would also encourage you to review the detailed guidance on developing a plan that was published in 2025 and is available on our website. That guidance contains additional information, examples and considerations that may assist you in developing your plan. However it's important to remember that any guidance should be applied in a way that is appropriate to your particular institutional context. Every provider's community, operating environment and risk profile will be different and your plan should reflect those differences. Just on that guidance, it's worth noting that in some places it refers to a template that was optional for universities to use. In contrast we're actually mandating the use of a template for all non-university providers. And that really helps you to ensure that compliance with the National Code is adhered to.

Providers can also choose to use the Regulator's optional worksheets which are available on our website to support their planning and assessment processes. The worksheets aren't mandatory and providers can use alternative approaches if they prefer. However where the worksheets are used providers should ensure that the outcomes of that work are appropriately reflected and incorporated into their final plan rather than existing as a standalone document. So they're really designed to help you build out the content you need to then inform your plan.

We've also extended the submission deadline for the plans to the 29th of January 2027, acknowledging the complexity of staff leave and provider shutdowns over the holiday period. Providers should ensure that they have published the plan on their website by this date.

A new National Code web portal is being developed which you will use to submit your plans. And we'll shortly commence rolling out that portal so please keep an eye out for further emails with instructions including a detailed user guide and instructional videos.

So let's get into the really exciting bit which is diving into the template itself. I'm actually going to take you through each of the sections of the template and explain what they're about. So the first section of the template is the 'About' section. And this actually must be retained in the final version of the plan. It includes a clear statement that the provider will respond to gender-based violence wherever it occurs, which is in line with the requirements of the National Code. Providers are able to add to the standard text to further outline their commitment to student and staff safety and wellbeing, for example through a statement from the principal executive officer. To ensure compliance of the National Code however please ensure that the standard wording in this section is not altered.

The next section of the plan is designed for the provider to clearly outline their specific context, and it includes three key subsections. So first the provider's overview and context, including locations, student and staff numbers, student accommodation arrangements that may be in place, the types of courses delivered, and any placement work or work integrated learning requirements, plus any other context that may be relevant. It's really important not to assume that the reader will understand all aspects of who you are as a provider, and this section should be written as a short explanation of who you are and what you do. In universities' plans we often saw infographics outlining relevant student demographics and statistics, as well as short summaries of a provider's history in this section.

The second subsection there is the provider's approach to preventing and responding to gender-based violence, including how these arrangements comply with the National Code's

requirements of being trauma informed and person centred. This section must include information about who in the organisation is responsible for leading and delivering prevention and response activities and how the provider prevents and responds to gender-based violence. So for universities this often included a short summary or diagram providing an overview of the prevention framework that the provider applies and the processes for reviewing and responding to a disclosure or formal report of gender-based violence when they're received. Providers often also included relevant extracts or publicly accessible links to supporting frameworks, policies and procedures. Please ensure that this section deals with both prevention and response, recognising that these are distinct but related concepts. This is a key requirement under the National Code.

If you have student accommodation as part of your organisation you must clearly set out how these approaches apply in those contexts, including any specific tailored approaches which respond to these high risk environments.

The third subsection there is how the provider is implementing the National Code with appropriate coverage across all relevant standards. So this could include a summary of implementation steps outlining any work that's been done to map National Code requirements to current practices, to identify gaps, and setting out responsible staff, team or working groups who are responsible for implementation. Importantly you don't need to set out how you're going to meet every single substandard of the National Code. That would make it a rather long document. But rather provide an overarching summary which assures both the regulator and your community that you understand your requirements under the National Code and have clear arrangements in place to implement them.

The next part of the template is all about evidence and data. So this section also contains three subsections. The first, you need to clearly outline the drivers of gender-based violence and identify contextual factors relevant to your organisation that contribute to these drivers. So we've provided some common examples of some contextual factors which may be relevant within the template but it's really important that you consider your organisation's unique contexts to meaningfully identify relevant factors. This section of the plan should be used to inform your whole of organisation assessment and corresponding actions. Ensure that you are actively taking steps to address the relevant drivers and contextual factors in your prevention and response approach.

Secondly you need to provide a summary of relevant data you have identified to inform the plan in your approach. So this might include internal data such as statistics on disclosures and formal reports, or survey findings, or drawing on broader data such as sector and

community prevalence rates where appropriate. This is also an area of the plan where you can outline clear plans to support collection of data to support your ongoing implementation of the plan.

Finally you need to provide an overview of relevant evidence you have identified to inform the plan in your approach. Evidence can be high level, referring to available national or international research, however it should be relevant to the provider's context and clearly linked to your actions.

The next section of the template goes to community engagement and this is a really important part of the plan. It's all about your community and how you've engaged with the community to inform development of the plan. This is really critical to showing that the plan addresses the specific needs and experiences of your students and staff. You first need to set out in appropriate detail who your community is, provide information regarding demographics, locations, study modes and where appropriate, accommodation arrangements. Consider how these different factors impact on the needs and experiences of different cohorts and how you've responded to these within your plan. Importantly you need to clearly outline those within your community who are disproportionately impacted by gender-based violence and how their voice has been captured within the plan. It should also be clear how the provider's community has been considered throughout all other relevant sections of the plan.

You then need to outline how and when you engage with your community regarding development of the plan, what the views of those involved in the engagement were, and how those views shaped the plan's development. So in universities' plans this often included a table summarising dates of engagement, engagement mechanisms, key findings and feedback and the actions that were taken in response. This is also an opportunity to set out how the provider will continue engaging with its community throughout implementation of the plan to ensure it remains relevant and effective.

Thirdly, if a provider owns, operates or manages student accommodation this section must include an oversight of those arrangements, specific risks, barriers and enablers relevant to the accommodation settings, and current activities being undertaken to support effective prevention and response. It's important that this section of the plan appropriately recognises that student accommodation is a high risk environment. If a provider has accommodation under its control or is otherwise affiliated with a student accommodation, a short summary of these arrangements should be included in this section, including the number of beds and locations where that's possible.

We're now moving into the core part of the plan which is really about identifying priority areas for change. So now that you've done all the work in identifying your context, your community and looking at data and evidence, you need to set out the key areas of change that you're going to implement. The first subsection is the whole of organisation assessment which you've heard us speak about quite a bit through this presentation. This is where you need to set out the approach you took, including what activities you undertook as part of your assessment to specifically identify risk barriers and enablers. This might include a desktop review of policies, analysing internal data and feedback, or through your engagement with students and staff. You need to outline who undertook this assessment and who was engaged as part of this process, outline when the assessment was undertaken and how the assessment considered all areas of the organisation to address that whole of organisation element. You then need to set out clear findings from this assessment by outlining risks, barriers and enablers identified in the table provided. These should be clear and detailed enough to ensure the reader can understand them, but they don't need to be overly long or complicated. This part of the plan is an opportunity to clearly demonstrate that the provider has a clear understanding of the areas that it needs to address in order to improve response and prevention efforts.

The table asks you to identify the relevant theme, for example policies and procedures or data capability, a short description of the risk barrier or enabler, observations and evidence, essentially some additional detail about how this was identified, the opportunities that exist for the provider to address or leverage the risk barrier or enabler, and links to corresponding actions or evidence in the plan to demonstrate how you've addressed that risk barrier or enabler.

The next subsection of this section is focused on a review of the provider's responses to disclosures and formal reports. So this section recognises that responding to gender-based violence is a particularly high risk area which requires careful consideration to consider gaps and opportunities in response to processes and policies. You need to set out how you undertook the review, including what activities were undertaken, who undertook that activity, and when it was undertaken. You need to set out the findings of the review, including the key barriers and gaps that may be impacting the provider's ability to effectively respond to gender-based violence and the opportunities you've identified to improve. These can be set out in bullet point or table form if appropriate.

As with the whole of organisation assessment, this doesn't need to be overly lengthy and complex. Clearly setting out the process and findings in plain English will ensure they are clearly understandable for the intended audience.

The final subsection in this area of the plan is the actions. So this is a really core part of the plan and it's where you clearly identify the actions you're going to take in response to the findings of your whole of organisation assessment and the review of your responses to gender-based violence. It's really important that your actions are clear and specific. Often where universities did not demonstrate compliance in this section was where they used vague language like consider or monitor. Another example is where an action is listed as review X policy rather than being specific about what the review will consider. A better example would be review that policy to ensure that it accurately reflects the unique needs of First Nations students and complies with the particular standard of the National Code.

That's just an example. Obviously you will apply your own relevant actions. Actions don't need to be overly complex. The best plans are the ones that are able to communicate clear, simple actions which respond to an identified need or risk and implementation can be recorded. The plan is designed to have a four year life cycle, so it's important that you consider actions that will be taken over the life of the plan, not just immediately upon implementation. It's also important that the actions are achievable within institutional resourcing and capability. There is no value in creating actions that you cannot possibly achieve. It's important that you consider actions across the whole of organisation, including for both students and staff. Again a common issue that we saw in universities' plans was a sole focus on students and no consideration of staff.

The tables provided ask you to set out who will be responsible for each action, the timeline for implementation and resources that may be required in order to implement those actions. As with all sections of the plan, the number of actions to be included and the complexity of those actions should be commensurate with the size and scale of the provider.

So the next area is the gender equality action plan, and this must set out actions the provider is taking to improve and embed gender equality within the institution for both students and staff. This is a really important aspect of the plan as it responds to gender inequality, which we know is a key driver of gender-based violence. As with the action plan this doesn't need to be overly complex or lengthy. Setting out clear actions which respond to known gaps or opportunities, cover both students and staff, and with timeframes for implementation is all that's required. Again it's expected that this section would be commensurate with the size and scale of the provider.

Many larger organisations may already be required to have a gender equality action plan through an existing federal, state or territory scheme for example. However these will only focus on staff. So if your organisation already has a gender equality action plan you can

reference that document within the plan itself and expand upon it to ensure coverage of the full National Code. You don't need to reinvent the wheel here.

The final section of the plan is the outcomes framework. And this is really about being able to measure and track implementation of the plan and ensure that the intended outcomes are being delivered. This is the primary mechanism that you will use to report to your governing body on progress against the plan. It's really important that you consider this section carefully to ensure that you've set really clear outcomes, sub-outcomes, indicators, measures and timeframes. I note in particular the need to set clear measures. Consider how you are going to specifically measure progress against this outcome. What data is available to support you to do this? Wherever possible, you should identify the specific targets you are setting out to achieve, for example by setting a specific percentage increase or number target. It's also important that you set clear timeframes for when you'll track progress and when you expect to achieve outcomes. Importantly this section of the plan is designed to support your organisation to implement the broader plan. You should aim to be ambitious but realistic in your approach, noting this is genuinely designed to be used by your organisation to drive change.

Finally, before submitting your plan to the regulator it must be approved by your principal executive officer and your governing body. These approvals must be recorded in the endorsement section of the plan with acknowledgements that the National Code requires institutional leadership to drive implementation from the top.

Just finally before we pass over to some of our university colleagues, I'll touch on just a couple of unique circumstances that may exist. So we recognise that there may be a small number of providers who have not yet established operations and don't yet have current students, for example where you may have registered with TEQSA but not yet be delivering. Where these providers have less than ten staff members we may consider delaying the requirement to develop a plan. So if you think this applies to you please contact us and we can discuss that further.

We're also aware of a small number of providers who are wholly owned subsidiaries of a Table A provider, so a university, and that these providers have raised questions around requirements to develop their own separate plan. In these instances it may be appropriate for that subsidiary provider to be captured under the broader universities plan where it appropriately considers the students and staff of the subsidiary. We've already made contact with providers that we believe fall into this category. However if you think that this might be you and you haven't heard from us please contact us and we can discuss this further.

So I'm now going to hand over to our colleagues from the University of New South Wales and Central Queensland University to share their practical experience developing a plan and outcome framework, including lessons learned and reflections on engagement and a whole of organisation assessment. So I'll hand over now to Penny from the University of New South Wales. Thanks Penny.

Penny Huisman:

[Visual of slide with text saying 'UNSW's experience and insights']

[Visual of slide with text saying 'National Higher Education Code to Prevent and Respond to Gender-Based Violence', 'Whole-of-organisation planning', 'NUHEPS', 'UNSW presentation', 'September 2026', 'UNSW', 'Sydney']

Thank you Kurt. Good morning everyone. So my name is Penny Huisman. All right. Look before we get started this morning I'd just like to acknowledge I'm on unceded land this morning on the lands of the Cammeraygal people, and just extend my respect to any Aboriginal or Torres Strait Islander people who've joined us today.

So a quick introduction in terms of where did the UNSW plan the drivers if you like, in terms of this particular bus. So I'm the head of the Safer Communities team at UNSW. We are in the Inclusive Communities Directorate. Should anyone wish to contact us there is an email contact on this slide. And so what I'll be taking you through today is just our approach to sort of distilling National Code fundamentals and thinking about your whole of organisational planning exercise, the principles, evidence and prevention thinking that we adopted in developing our plan, the activities that supported development of our plan, and then just some experience and learnings that we had around how you can prompt senior leaders to review your plan. That final link there for anyone who's interested will take you to the published plan.

Okay. So Code fundamentals and what they mean for your whole of organisation plan. So one of the things I think we'd all acknowledge is that the Code is a complex document and with that complexity come challenges at times in communicating to different audiences what the Code requires of organisations. So at UNSW we really tried to distil down to some really important elements that we need to think about when looking at our plan. And so we distilled this essentially into three different types of activities with some structures in place to support those activities, and then a broad range of reporting requirements related to those activities.

So the structures piece really refers to key documents or processes that are instrumental in your thinking about your whole approach as an organisation. So your plan, your policy and consultation or co-design participatory approaches to your work. The three activities that we focused on were thinking about prevention activities, response activities, and then impact and evaluation activities. And then as I said understanding that we would need to report on our structures and our three groupings of activities. So this is one useful way to start to orient yourselves and orient all the different teams that you may interact with to what the Code requires.

And we then took this understanding to also be very, very structured about what needed to be in our plan. If you like this was putting our student hat on and really developing our own rubric, marking rubric in terms of what content we knew we needed to address. Of course we were working at that stage with less structure from the Regulator. And so you have that available to you, which should be I think really helpful. But there's no doubt having a clear list of what you need to cover is really, really crucial in keeping track of where you're at and what still needs attention.

Okay. So that was just some sort of broad approaches we took in terms of communicating to our community what was involved and what we needed to put in the plan. This next section focuses on the principles that we adopted, how we approached evidence and how we approached thinking about prevention for our plan.

So in terms of key principles guiding UNSW actions, the first principle was to be very, very thorough in identifying what existed already at the organisation. And I've provided here some prompts in terms of how you might consider you could approach that, and this is based on our approach. Now we were fairly fortunate at UNSW in that we already had quite substantial activity in place. So we had a strategy, an action plan that was focused on gendered violence that was introduced in 2022. We had existing student reference groups, an operational group focused on risk assessment and identification, and staff expert groups. So we had existing sort of governance structures and groups, and we had already done quite a lot of work in terms of reorienting our policy and our student and staff education towards gendered violence. So moving from the sort of previous focus in relation to things like sexual harm and sexual misconduct towards that broader approach of talking about gendered violence. So all of those existing pieces were incredibly useful for us in thinking about what we would like to do next.

And so how we approached that as I said – and Kurt referred to a gap analysis – we did gap analysis activities with something like 20 teams. And as I said, that both identified gaps, but

also identified what we did have in place. We looked for processes that captured relevant feedback or experiences or attitudes. We looked for higher risk activities undertaken by students and workers, and we tracked down the teams that coordinate those activities to talk to them. We identified the teams who look after operational response to incidents. They had really rich information about barriers and enablers. We looked for any teams that might be collecting relevant experience data that we could use. And we also really interrogated our student and staff demographics to look at what that told us about risks. And so again one of the existing pieces of work that we had was an annual report on gender-based violence incidents. We've been reporting since about 2020, so even though there's obviously been changes in that time we still had quite a lot of data that we could look at in terms of risks.

The next principle is really to be very clear about where you have nothing, firstly because that is going to shape your priorities, but secondly because if you have something that is going to be completely new to your organisation, the one thing you can be certain of is that you'll need more time and effort than you think. So being really clear as a result of identifying what exists where you have nothing and considering that that is going to probably be a priority and something that will take you more effort than you can anticipate.

The last principle is to start thinking about change early in the process. So as examples of that we use the gap analysis activities with teams to start discussions about improvements. We did a lot of what I would call reverse engineering. So we talked a lot about things in terms of if something was working, if something was improved, what would we see? We had started to use a fairly kind of simple way of talking to teams about changing individual behaviours – so this is the COM-B model – and really therefore eliciting sort of rich information about what sort of capability might be needed, what sort of opportunities might people need to use their capability, and then motivation. So how would people be motivated to recognise the opportunity and then use their knowledge and skills?

So really not only are you gap analysing, but you're also starting to think about well what's this telling us about the change we might want to create? And then finally thinking about your change logic. And this can be as simple as some if then type statements, but thinking about based on what you've heard and what you know, how are you going to get to an end point? What are the steps in that process? So those were just the really three important principles for us.

The next key kind of thing to really I think highlight is different approaches to evidence informed thinking. The plans of course do have a really good call out and focus to use evidence and there is lots of different types of evidence available to you. And so I've tried to

organise this here in terms of thinking about internal evidence that you can access about systemic risk or barriers and enablers at your organisation, evidence that can come through peak organisation content. So of course our watch has some really useful content but we've also just highlighted Safe and Equal, Full Stop and Transfemme that have some excellent resources to tap into. And finally linking your internal evidence, as Kurt has already highlighted, with some published literature findings. So understanding your knowledge of your internal organisation, what that might mean in the context of what external evidence suggests about high risk times, cohorts that might experience higher risk relationships or particular kind of workplace contexts where we can see higher risk. So there was just some themes there that you could explore.

The final piece as I said of the puzzle was having an approach to communicating and thinking about preventing gender-based violence. This is quite complex, often particularly when you're trying to introduce some of these ideas to audiences that haven't thought about this stuff in the past. And so again just as we tried to reduce the complexity of the Code into something that became a bit more approachable, we also developed some ways of talking about preventing gender-based violence that tried to reduce some of the complexity about thinking about it. So really you're thinking in terms of reducing individual harmful behaviours. And there are some ways that you can approach that. You can think about factors that might reduce someone's vulnerability to experiencing gender-based violence. So that can relate to things like power imbalances for instance, or financial hardship, difficulty accessing accommodation. And then you can also think about capacity increasing in terms of populations. And so gender equity for instance initiatives are really important in relation to reducing vulnerability and increasing capacity. But I would suggest you would want to think about all three pillars of activity in terms of thinking about actions in your plan.

You can also consider different levels of action. So at the individual level you might look at programs that address behaviour change, substance use, gambling, things like that. At institutional level you might look at your local institutional leadership, what behaviours do they model, how do they demonstrate that this is a priority and important in the organisation. Or you might look at social cultural change, in which case you might be looking at things like bystander type training or other types of social norm type change.

So as I said that was our third key bit of thinking in terms of developing our whole of organisation plan.

Some activities that supported all of this. So as I've already called out, we did conduct a really comprehensive gap analysis. We went through our archives around previous

consultation in relation to some comms campaign development, policy development, and we did a thematic analysis of that consultation looking for concerns, priorities and themes. A lot of rich sort of student data really arose from that. We looked at organisational risk assessment with in particular the operational teams that were already very much focused on recognising and responding to risk. We looked at the existing strategy and plan and did a review of how that had gone, established a working group, and then worked with our engagement partners, so our gender violence student reference group, subject matter experts group. Obviously went quite broad in terms of seeking feedback from EDI reps in faculties, our student union and so on. So those are the kinds of actions that we took to support the evidence, having a good evidence base, but also having really kind of substantial engagement and feedback on our work.

And last slide. This is just some pointers in terms of when you are having your final plan reviewed for endorsement to be published and provided to the Regulator. Again we found it was really important to support our executive leadership by orienting to some useful questions that they could ask. And so these were the types of questions that we kind of suggested to them were the sorts of things that they should answer or look for answers as they reviewed the plan that we were putting forward to submission. Okay. And that is me done for UNSW. I will stop sharing.

Kurt Carmichael:

Thanks so much Penny. That was really insightful. It's really useful to hear about what happened on the ground within your institution. I'll now pass over to Nikki from Central Queensland University who's going to talk a little bit about their experience.

Nikki Rillstone:

[Visual of slide with text saying 'CQU's experience and insights']

[Visual of slide with text saying 'CQUiversity', 'From Compliance to Capability', 'CQU's approach to developing a whole-of-organisation GBV Prevention & Response Plan', 'Published September 2026']

Thank you. So my name's Nikki. I was the project lead for developing CQU's GBV plan. And I'm joined today by Professor Jonathan Powles. He's the Vice President of Student Success at CQU and is the executive sponsor of this work. Our presentation today is probably going to focus more on the journey that we took to developing our plan and the experience that the plan became much more than just compliance work.

I also just want to acknowledge that I'm joining you from the Kyemai lands of the Eora Nation here on the beautiful Sydney Northern beaches. And Jonathan is coming from Darumbal lands in Rockhampton up in central Queensland.

So we started probably not from the same foundations that our colleagues at UNSW have started from. So CQU is quite a unique institution. We have a large footprint with 13 campuses nationwide. We're also dual sector. So we have about 30,000 students and 3,500 staff with an extensive regional and remote delivery. The average age of a CQU student is about 28 and we have two on campus residential colleges. But the first thing we did was establish a project team. And Jonathan I might throw to you for some context around that decision.

Jonathan Powles:

Yeah. When the policy environment solidified such that we realised we had to do this, we took the conscious decision to locate our development of our plan in response to the Code outside of any of our existing functions. Partly that was because we needed to give a genuine and evidence based assessment of the gaps between what we were currently doing and what we needed to implement. And we were lucky enough to hire Nikki and then a couple of people in a team around Nikki to sit outside in that way and reporting directly to me as the executive sponsor, one of the executive sponsors, to roll out the implementation. So I think that's an important dimension to bear in mind. Nikki back to you.

Nikki Rillstone:

Yeah. And I think I'll just add to that, in that not only did this give fresh eyes to the work that needed to be undertaken, but we were also as a project team given an open mandate to understand what was happening across the university and identify gaps and make those recommendations. But we also took the position to not start from the premise that everything was working, to start from the premise that we actually needed to find out. And that's what we did. Before writing anything, and again coming externally into the university, we gathered information. So as a project we went into leadership committees, academic committees, we spoke to staff and students one to one, we went to student groups, we looked at our policies and processes, we looked at systems and data and we talked to the people actually operating those systems. And we started to map out the ecosystem. At this stage we really weren't trying to I guess solve everything. We just needed to understand how it actually interacted. And we spent the first few months of the project predominantly in consultation. And I think what was important here as well, we didn't only just look internally, we looked

externally as well to see what else was happening in the sector. And we actually joined a working group with our run network, which I encourage you to do because we took a lot of learnings and some advice from our colleagues in similar institutions to us.

Importantly we also set up a Respect steering committee that held the project accountable and met regularly and had the oversight of the development of the plan. And I think what was unique about that steering committee Jonathan was that it held a lot of executive membership as well as student membership and people with lived experience. But these were the questions we will start to look at.

Jonathan Powles:

Yeah. Can I just comment on that? I think it's a really important point. Sorry Nikki. I was just going to talk about the previous slide. Just picking up your point about the real diversity of people we've got on that steering group. That was essential. Because one of the things we quickly realised when we started this work was that not everyone saw the task or even the issue through the same set of eyes. For some people GBV was first and foremost around the supporting of victim survivors through a traumatic experience. For others it was about compliance with a regulatory body. For others in the legal team it was about risk. For others it was about a process around complaints. And then of course there's the staff and student dimension. So we had a really big group to oversee this, not because we thought that was a good or efficient idea, but because we needed to capture the diversity of that perception around what actually our response was.

Nikki Rillstone:

I guess that's where the project started to change for us as we talked to people across the university and understood the existing ecosystem. It became increasingly obvious that we weren't just developing a compliance plan. We were taking the university on a journey. And we were starting from a position where there wasn't necessarily a shared understanding of what GBV prevention and response meant in practice. GBV literacy was uneven, trauma informed principles were not consistently understood, and there was this perception that trauma informed approaches could be weaponised or somehow sit in opposition to procedural fairness.

We also found that the distinction between a disclosure and a formal report also wasn't well understood and that those things often were conflated, and that had consequences of how our people experienced our system. So we realised that if we just simply produced a plan

and introduced a few new policies, we weren't going to solve the underlying cultural problem. And I admit this is still a journey that we are very much still on.

But that I guess changed the way we were asking questions. And this was the real shift in the project that we undertook. The consultation changed the questions we were asking of ourselves. And whilst we were still absolutely focused on the Code and its requirements, we started to ask a much more fundamental question. And that was are our existing systems and organisational culture actually capable of achieving the intent of the Code? And that led to the questions around GBV literacy, trauma informed practice, our reporting culture, system fragmentation, and whether we were actually seeing the full picture of risk. And this is where it moved from being primarily about developing a plan but to understanding and changing the organisation.

Jonathan I don't know if you want to add anything.

So I think one of the key things that we did was we took the project to our governing body very early on in the piece. We weren't taking them a draft plan, but we just wanted to put them on notice that we were going to look at the whole of organisation. We were going to ask difficult questions and we may find that existing arrangements aren't working, and that we may actually recommend some structural change. And we needed that institutional permission to do that properly and I guess put our council on notice that we needed their visibility, I guess institutional ownership at the highest level. As a project lead that gave me the confidence that if the assessment identified something uncomfortable that I had the mandate to actually go and address it. A whole of organisation assessment can't be meaningful if the organisation isn't prepared to hear what it finds. And Jonathan I can see you want to jump in.

Jonathan Powles:

Yeah. And I mean in a way I'm here just to evidence exactly what Nikki's talking about here. Whole of organisation just doesn't mean across laterally, across the breadth of the organisation. It means vertically from the very top of a university. That's the Chancellor through to the Vice Chancellor to the executive. And everyone has to be in alignment around the changes that need to be made, otherwise you'll set your project lead up to fail. Because this is contentious. This is difficult. And sometimes it's highly emotive stuff that we're talking about, and to think that the entire institution is going to fall into place because we write a good document is a little naïve. So I really emphasise the extent to which that early

alignment across all levels of the organisation as well as all dimensions of the organisation is vital to success.

Nikki Rillstone:

So I guess after those first few months of consultation we had a much better understanding of the organisation, but we needed to test what we were actually hearing against the information the university actually held. So that's where the formal whole of organisation assessment came in. So we reviewed six institutional information sources, so covering a period of January 2023 to October '25. We were trying to get sort of a three year period. And this was really important because the consultation sort of told us one part of the story but the data told us another, and we needed both. So what we found in that whole of organisation assessment was identified 153 GBV related disclosures across the systems we reviewed. Around 15% entered formal reporting processes. And the staff psychosocial survey showed that 97% of relevant disclosures had not been formally reported. And so that kind of reinforced something that we had already started to hear through consultation, and that was formal reporting data was not the same as the prevalence of risk. People were self-managing. People were disclosing without wanting to formally complain. People were concerned about escalation and reprisal. Our systems weren't always making those distinctions easy. And one of the strongest conclusions we reached was the absence of a formal report cannot be interpreted as the absence of risk.

We had cultural barriers and structural barriers reinforcing each other. So if someone didn't trust the system they were less likely to formally report. If they did disclose the system wasn't always clear about what happened next. And because the information sat across different systems - - -

Sorry. I just lost my page. We didn't always have a complete picture of emerging risk. So we couldn't conclude that we couldn't address GBV simply through individual case management. We needed to actually look around the conditions. And that really became the foundation of our plan and the reforms that followed through that implementation process and the development.

So I guess this is where that whole of organisation became real for us. And I'll use student accommodation as an example. As I mentioned earlier we have two on campus residences, Capricornia College in Rockhampton and Canefield College in Mackay. But we didn't just look at whether accommodation had the right policies. We looked at the environment. So shared living, peer dynamics, afterhours activity, alcohol, bystander behaviour, power

dynamics and intersectional vulnerabilities. And we looked at the data of the disclosures that had come in over those three years and we found that 45% of disclosures made to our Safer Communities team related to residential settings. So the assessment really led us to targeted action, but we also identified placements and field work as emerging areas of risk in that assessment. And I guess that's what we mean by looking at whole of organisation, looking beyond just the formal reporting system to the environments in which risk is actually produced.

Jonathan Powles:

And if I could just jump in on that one. It's so important that you take that overall top down view. So I'll share that we had two conduct policies, one to apply to our students in general and one to apply to our residences. And actually without going into details, the fact that those two things existed simultaneously created an enormous amount of risk for us that is actually really live in an incident that we're dealing with right at the moment. I think it's a good – so we got something wrong in that sense to allow that to continue. And I'm sharing that only to observe that this process allows all of us to take that fresh pair of eyes and tweak and fix things that are otherwise going to ultimately leave people vulnerable. Thank you Nikki.

Nikki Rillstone:

So once we realised that we had a bit of a cultural and capability challenge, training became much more than a compliance requirement for us. And we developed our Respect at CQU training modules in-house and we used existing learning design expertise and institutional systems to do that. We're also very lucky to hold a partnership with the Queensland Centre for Domestic and Family Violence Research. So that actually allowed us to tailor the content to our context. But we also wanted to know whether the training was actually doing anything. So we embedded an ethics approved pre and post training survey. And that gave us a measure of change in knowledge, an avenue for feedback on the course and increasingly valuable information about our prevention capability. And because of our regional and remote footprint we're also collecting data that is particularly valuable in understanding GBV capability in those communities and how that dataset can support a future research project. So again we took something that the Code required us to do and then asked ourselves how can we turn this into an institutional learning?

The other major outcome of our whole of organisation assessment was structural. Our assessment identified fragmentation as a systemic risk. So we didn't just write that

fragmentation was a problem. In our plan we put together a change against the organisational architecture. So safer communities were substantially reformed into a dedicated student specialist unit with three core functions. It's our case management, so that's our support response team, prevention, education and training, and then conduct and investigations. So the purpose wasn't to collapse all functions into one process. There are important boundaries between support and investigations. But the purpose was to ensure that the organisation had a specialist capability and visibility to connect those functions appropriately. The structure was also very deliberate. We wanted the unit staffed with the expertise required under the Code, but to deal with the complexity of these matters. And that includes risk assessment, accredited specialist expertise and procedural fairness expertise because they don't neatly fit into one professional discipline.

The organisational positioning is also equally important. It's actually its own accountability function and reports directly to the Vice President Student Success. We didn't want it to be diluted or lost in a broader wellbeing function, and we didn't want support sitting on one part of the university, conduct in another and risk information elsewhere. We wanted a structure where there was a clear accountability and specialist visibility.

Jonathan Powles:

And if I could just add. So that's really underlined and emphasised that getting that right is really vital. Getting that accountability, visibility and transparency of ownership of functions is essential. And I think that's worked well at CQU. And the next part is ensuring that the relationships that are built across those structures, so the relationship between this function and our people and culture area, our residences, our wellbeing unit, are all essential as well. So it's not just structure. It's also a relationship.

Nikki Rillstone:

And this brings us back to one of the cultural issues that we identified early. So again, and that was that sort of confusion between disclosure and complaints or formal reports. So again part of an action that we got out of our whole of organisation assessment was to create a harmful behaviours disclosure tool, specifically to provide a protected low barrier way for people to tell us that something had happened. A disclosure doesn't necessarily mean a formal complaint. And that distinction allows us to provide support and safety planning while also identifying emerging institutional risk. So the goal was to move from individual disclosure with individual response towards individual disclosure, appropriate

response, organisational learning and targeted prevention. And again that's very much a journey that we're still on.

So our approach in one line. We moved from what does the Code require us to do to what does our organisation need to change to actually achieve the intent of the Code. And I think that's the simplest way to describe the shift that we went through. We started with the regulatory requirement. We established a project team. We gathered information and we listened. Through that process we realised we were dealing with a much bigger organisational challenge. So we changed the questions we were asking. We started to look at our culture, GBV literacy, disclosures, system fragmentation, governance, risk, capability and accountability. And the plan actually became a way of bringing all of those pieces together.

So if I had to reduce our experience to five lessons, these would be them. First, start with people, not the document. Understand your culture, capability and your ecosystem before trying to prescribe solutions. To give the work dedicated capacity, a genuine assessment needs fresh eyes and permission to challenge the status quo. Third, get governance permission early. You need institutional ownership before you start identifying uncomfortable systemic issues. Four, treat fragmentation as a risk. If information, responsibility and accountability are fragmented, your response will be too. Five, use compliance to build capability. Ask what you can learn, measure and improve, not just what you need to demonstrate. And I think it's important to just understand your own context and ask what will actually work in your organisation. That's probably the biggest lesson that we can share is that compliance can tell you what you can do, but a good prevention strategy should help you become capable of doing that well. That's it. We've got an email address there if you've got any questions. If you Google CQU GBV our plan should come up as well. I realise I have not actually promoted that in this slide deck at all, but I'm very happy to connect with anyone with any questions about our experience.

Michelle Clark:

Thank you so much. We really appreciate Nikki, Jonathan and Penny sharing your experiences. And I don't think I could have summed it up better than you did right at the end there Nikki. I think taking it not as a compliance exercise, but actually what is the intent of the Code. And I know many of you come from really small institutions. So what you've seen from Penny and Nikki and Jonathan might seem a bit overwhelming, big institutions with a lot of resources. But the essence of it, that is what the Code is asking you to do. It's that self-critical eye. It's tailoring to your circumstance. It's centring safety and people in your

activities. And it's really asking that question about well what can we do and what changes can we make to make our institution a safer place? So thank you so, so much. It's just been wonderful to have the reflections from people who have gone through the process, to be able to share.

This is the Q&A part of our session and I know we've only got seven minutes left of your time. We have gotten a couple of questions beforehand which I'm happy to go through quite quickly but we'll also be updating our frequently asked questions just based on some of the questions that we've received today. So we did receive a question about where providers are separately registered with TEQSA but share overarching ownership or governance, do they need to develop their own prevention and response plans? And this has come up a few times from a couple of different folks. So I'll give you a quick answer but we're happy to put something on the website as well that clarifies this. That in accordance with Standard 1 of the National Code each individual provider is required to prepare, implement and publish a plan and then submit a copy to the Regulator. So we really do acknowledge that there's some different structures and we're going to take a pragmatic approach to considering whether a provider meets specific requirements or appropriate consideration of whole of organisation approach.

So for example it might be appropriate for there to be alignment between related provider plans, including replicating content where appropriate, if information moves across different organisational structures. But what we do expect, that each plan clearly demonstrates how it's been tailored to the specific needs and experiences of that provider's community. So a one size fits all absolutely won't do it, but kind of thinking about your context, sharing things where you can, but drawing out the differences will be really key from our perspective.

Another question we got was:

Q: Can the GEAP for inclusion of students be part of the NUHEP plan template or completed at a later date, such as March 2027, or does it need to be implemented by the 1st of January?

Kurt this is something that we've heard a few times. Do you want to take this one?

Kurt Carmichael:

Yeah. Thanks Michelle. So the National Code does require that a gender equality action plan is incorporated as part of the whole of organisation prevention and response plan. So the short answer to that is essentially yes, at the time of submitting the plan to us on the 29th of

January and publishing the plan, you should have a gender equality action plan. For organisations who already have a gender equality action plan in place you can submit this as an annex to the plan or a direct link to the plan in order to demonstrate compliance as long as it incorporates both students and staff. If you don't have an existing gender equality action plan you will need to create one. And providers can choose how to incorporate their GEAP – sorry – their gender equality action plan as a clearly identifiable component or section within the whole of organisation plan. Or again you could create a separate document to cover this off.

What I will say is that the obligation is there to have the plan in place, but that doesn't mean that you have to have every action within that plan fully implemented. It just needs to show demonstration that you've thought about the actions you're going to take in relation to gender equality and you've put those into the plan. I would also note that there's ability for you to continue developing the plan over time. So should you kind of, for the purposes of the 29 January date, develop a plan which sets out some of your clear actions, there's nothing that will stop you from continuing to engage with your community around that and updating that plan as you go. So that would be kind of the key advice from us on that one.

Michelle Clark:

Thanks Kurt. We've got a question about:

Q: Is GBV training mandatory for all staff on campus or only for staff who have student facing roles?

And the short answer is yes. So Standard 3.1 of the Code states that a provider must ensure the delivery of ongoing comprehensive prevention education and training to its students, leadership and staff. So this is a really broad expectation and covers all staff, not just those in student facing roles. We are reasonable and we understand that it can take time to roll out training across institutions. I would suggest you focus at the beginning on the student facing roles, if you were to prioritise some, but absolutely there's the expectation that all of your staff cohort are considered in the requirements of the National Code.

I'm just looking at time. With three minutes left I can answer one really quickly, which is Standard 7 obligations where a provider has no student accommodation arrangements. So this is student accommodation in Standard 7 is a whole complexity in and of itself. So we'd like to clarify some of the advice around accommodation providers, homestay providers, and whether NUHEPs need to apply legislation or weave risk assessments into the whole of organisation submission and action plans. We will put some additional guidance up about

this. I think that's the easiest way to deal with the complexity of this one. But we're also willing to take specific questions if you have it. I know there's a whole range of arrangements to do with accommodation that can get quite niche and complicated. So we're very happy to have a conversation to help you navigate that one. But I would say broadly, so homestay specifically, standard 7 obligations do not apply to homestay providers and pathway provider partners. So things that are not kind of falling under that affiliated accommodation don't necessarily apply either. So as I said there's a couple of complexities and things that may fall through, so please contact us if you'd like some additional help working through that one.

Kurt Carmichael:

Michelle I was just going touch on a couple of kind of really simple ones. There's some questions there about using your own branding. I touched on it briefly in the presentation, but for the final version that you publish on your website you're able to apply your own branding and formatting templates, again provided that the content is there. You're also able to build on the kind of basic content that is required by the National Code to include other content that's relevant. But in terms of submitting to us at the Regulator, we ask that you use that standardised template. It just supports our review process when we have so many providers to look across the page.

I know there was also a key question there around probably feeling a little bit overwhelmed given the amount of work that needs to be undertaken for the whole of organisation prevention and response plans. And so I really would reiterate what Michelle said there. Obviously you are not all going to be universities and even within the university sector we know that capability and resourcing is really different. What I would say is it can feel a little bit overwhelming but if you get back to the basics of some of those key messages that came through from the providers, that's really what's important. And again you'll tailor it to your unique circumstances. So for an example of a provider that might only have 20 students and a small number of staff, obviously the level of detail and the amount of actions we will be expecting you to take through your plan is going to look significantly different to a provider which may have thousands of students. You would probably in that circumstance hone in on the really particular risk to your organisation and some really clear actions you're going to take in response. So if people are feeling a little bit stressed, please do reach out to us and we can try and assist wherever we can.

Michelle Clark:

So between now and January 2027 if you have questions about the template or are unsure how to approach a particular requirement or have any other queries, please reach out to us. Our details are on the screen there. We are here to help would be the other key message that I want you to hear. This is a – the Code is complex, it's ambitious, it's incredibly important. We want to work with you as a partner as you navigate the uplift and increase the safety of your students and staff. As you all know, and hopefully you have clocked, while the 1st of January is when the Code does apply to NUHEPs, we are not seeking submission of those plans until 29th of January. Many of you have heard me say before the 1st of January is a very unfriendly timeline for the implementation of anything. And I'm really aware that in the sector there's a lot of closing down for Christmas and New Year as we do in the public service as well. So we won't be here on the 1st of January to receive your plans. So hence the extension to the 29th of January which hopefully should give everybody the ability to enjoy Christmas and then hit the ground running when the year starts to get going.

We will communicate upcoming activities through our usual channels. In the meantime the mandatory template and accompanying guidance are available on our website and I really do encourage you to work through them if you haven't done so already. I want to thank again Nikki and Penny and Jonathan. It's so generous of you to share your experience so openly with the sector and I'm sure it was incredibly valuable for everyone to hear about the journey that you've gone through. And finally thank you everyone for joining us today. We hope today's session has been useful as you continue on your implementation journey. A recording and any supporting materials will also be available so you can slow it down and watch it again and pull out all those key lessons to help you as you go forward. But thank you so much everyone and have a lovely afternoon.

[End of Transcript]