UniLodge

UNILODGE
GBV STRATEGY

Whole-of-Organistion Gender-based Violence Prevention and Response Plan

JANUARY 2026 - DECEMBER 2028

1800RESPECT: Australia's national support service for domestic, family, and sexual violence, operating 24/7.
https://1800respect.org.au/
Call: 1800 737 732
(NRS: 1800 555 677 - Interpreter: 13 14 50)
Text: 0458 737 732

Lifeline: National organisation providing all Australians with 24/7 crisis support and suicide prevention services.
https://www.lifeline.org.au/
Call: 13 11 14
Text: 0477 131 114

QLIFE: Australia's national, free, and anonymous peer support and referral service for LGBTIQ+ people, their families, and friends
https://qlife.org.au/
Call: 1800 184 527 – 3pm to 9pm daily

13Yarn: national crisis support line for mob. Confidential one-on-one yarning opportunity with a Lifeline-trained Aboriginal & Torres Strait Islander Crisis Supporter 24/7.
https://www.13yarn.org.au/
Call: 13 92 76

Men's Referral Service: services to support men concerned about their behaviour to change what they are doing and keep women, children and communities safer – 24/7.
https://ntv.org.au/mrs/
Call: 1300 766 491

QUICK REFERENCE – SUPPORT SERVICES
All services are FREE and confidential

ACKNOWLEDGMENT OF COUNTRY

We acknowledge Aboriginal and Torres Strait Islander people as the traditional custodians of the land upon which we learn, live and work.

'We pay our respects to Elders past and present and acknowledge their spiritual connection to country.

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At UniLodge, we believe every student deserves to live, learn, and thrive in an environment free from violence, fear, and discrimination. As Australia's leading provider of student accommodation, we recognise that with this position comes a profound responsibility—not only to provide safe physical spaces, but to cultivate communities built on respect, equality, and dignity.

Gender-based violence is a pervasive issue that affects our entire society, and the university sector is not immune. The statistics are sobering: nearly half of all students experience sexual harassment in their lifetime, with women, First Nations people, LGBTQIA+ individuals, and international students facing compounded vulnerability. These are not just numbers—they represent real people in our communities whose safety, wellbeing, and futures are at stake.

This Whole-of-Organisation Prevention and Response Plan represents UniLodge's unequivocal commitment to preventing gender-based violence and supporting those affected by it. It reflects months of consultation with our residents, accommodation staff, university partners, and those with lived experience of gender-based violence. Their voices have shaped every aspect of this plan, and I am grateful for their courage in sharing their insights and experiences.

We acknowledge that preventing gender-based violence requires more than policies and procedures—it demands sustained cultural change. It requires us to challenge the underlying drivers of violence: gender inequality, rigid stereotypes, and systems that enable harm. It requires us to create environments where respectful behaviour is the norm, where bystanders feel empowered to act, and where those who experience violence feel safe to disclose and are met with compassionate, trauma-informed support.

This is not a task we can complete overnight, nor one we can achieve alone. It will require ongoing collaboration with our university partners, support services, and most importantly, our residents and staff who are integral to building and maintaining safe communities.

The safety and wellbeing of our residents and staff are our highest priorities, and we are determined to create environments where violence is not tolerated and where people are supported with dignity and care.

This plan is a living document—one that will evolve as we learn, as our communities change, and as we work collectively toward a future free from gender-based violence. I am personally committed to ensuring its implementation and to holding our organisation accountable for meaningful, measurable progress.

Together, we can create residential communities where everyone is valued, respected, and safe.

INTRODUCTION

Gender-based Violence (GBV) encompasses any harm, coercion, or control based on gender, including sexual assault, harassment, stalking, coercive control and technology-facilitated abuse.

For student accommodation providers, Gender-based Violence prevention requires a multi-layered approach, irrespective of whether you manage on-campus halls, purpose-built student accommodation (PBSA), or off-campus strata holdings. At its foundation, this involves integrating evidence-based practices into the operating environment, mitigating gender inequality and fostering a respectful culture for all.

UniLodge has sought to imbed a practical, actionable framework drawn from our own deep consultation, sector guidelines, government action plans, and best practice principles. Our approach has focused on identifying and understanding systemic risks, enablers and barriers to preventing Gender-based Violence, and facilitating trauma-informed and culturally competent service design.

Research shows that Gender-based Violence prevention requires an integrated approach, wherein robust response is part of a successful prevention strategy.

As such, this action plan addresses both components in equal measure.

UniLodge recognises that Gender-based Violence disproportionately impacts women and acknowledges that intersectionality significantly compounds vulnerability and complexity for First Nations people, Culturally and Linguistically Diverse (CALD) communities, people with disability and people of diverse sexual orientation and gender identity.

This Strategic Action Plan was established to execute UniLodge's obligations under the National Higher Education Code to Prevent and Respond to Gender-based Violence 2025 (the Code) and constitutes a Whole-of-Organisation Prevention and Response Plan for the purposes of Standard 7 of the Code.

Gender-based Violence can be complex and dynamic, and UniLodge acknowledges that this will be an ongoing piece of work.

DEFINITION

UniLodge adopts the definition of Gender-based Violence set out in the Code.

To support a primary prevention approach, UniLodge has applied an expanded definition of Gender-based Violence to include the factors that drive and contribute to Gender-based Violence:

Gender based Violence means any form of physical or non-physical violence, harassment, abuse or threats, based on gender, that results in, or is likely to result in, harm, coercion, control, fear or deprivation of liberty or autonomy, and where the conduct is:

(a) Driven by unequal gender power dynamics or relationships, and/ or

(b) Connected to gendered expectations or stereotypes, and/ or

(c) Extended to Gender Identity and/or expression.

FACTORS THAT DRIVE AND CONTRIBUTE TO GENDER-BASED VIOLENCE
Standard 7.2(b)

DRIVERS OF GENDER-BASED VIOLENCE

Gender-based Violence stems from systemic gender inequalities, often coupled with intersecting discrimination. The drivers of Gender-based Violence that UniLodge is working to address are:

- The underlying context: which stems from beliefs and laws that grant men more power and opportunities than women.

  - Rigid gender roles, stereotypes, and dominant forms of masculinity

  - Men's control of decision-making and limits to women's independence in public and private life.

  - Condoning of violence: Societal tolerance of violence, including through sexist jokes, excusing harassment, or laughing at Gender-based Violence.

  - Cultural normalisation of women as inferior to men.

  - Male peer relations: Bonds between men that emphasise aggression, dominance, control, or the disrespect of women, which can increase the likelihood of violence.

- Systemic and intersecting discrimination: Legal, economic, and institutional discrimination, as well as prejudice based on factors like class, race, age, sexuality, and ability, which create environments where Gender-based Violence is condoned.

GENDER-BASED VIOLENCE IN HIGHER EDUCATION AND STUDENT ACCOMMODATION

In Australian higher education, Gender-based Violence is driven by power imbalances, gendered peer cultures, alcohol-fuelled social environments, and student isolation, creating a continuum of harm that spans from locker-room talk to egregious physical assault.

The 2021 National Student Safety Survey of 43,000+ students found that 48% of all students had experienced sexual harassment in their lifetime, including 62.9% of female students and 76.8% of non-binary students.

Of those female students who reported being sexually harassed, 10.5% stated that the harassment had occurred in a university setting in 2020-2021. Additionally, 1.4% of women reported being sexually assaulted in a university setting in the same period [1].

Student accommodation ranked high for significant incidents, with 25.8% of the most serious incidents occurring at university clubs or society events, and many linked to residential halls.

International students face greater vulnerability to Gender-based Violence due to language barriers, cultural isolation, and distrust in reporting systems. Consequently, only 5–10% of incidents are formally disclosed. LGBTQIA+ and First Nations students reported experiencing compounded harm from intersectional discrimination, resulting in higher dropout rates, poorer mental health, and reduced sense of belonging.

[1] The survey (43,819 respondents) notes likely lower figures due to COVID-19 disruptions reducing in-person interactions—only 33.6% of students attended some/all classes on-campus in the survey period, and lockdowns likely suppressed on-campus events/parties, where many incidents occur.

ABOUT UNILODGE

UniLodge is Australia's leading provider of student accommodation, delivering safe, inclusive, and modern living environments for university students nationwide. Operating over 110 properties across all major cities, we accommodate more than 38,000 residents annually in a mix of purpose-built student accommodation (PBSA), university-owned residences, and strata-titled properties, bringing the portfolio within Standard 7 of the Code.

Our portfolio includes on-campus partnerships with leading Australian Institutions, alongside off-campus developments in prime urban locations. Supported by approximately 1,200 staff, including some 400 student leaders, we provide 24/7 support, residential life programs, and community events to foster belonging and wellbeing.

Our residents reflect the multicultural nature of Australian tertiary education. Approximately 70% are international students from over 100 countries, including large cohorts from China, India, Vietnam, Indonesia and Malaysia, and approximately 30% are domestic residents. The majority are full-time undergraduates and postgraduates aged 18–25, with a gender distribution of approximately 54% female, 43% male, and 3% non-binary/gender-diverse.

UniLodge supports equity through annual hardship funds for students from low socio-economic backgrounds, regional students, and First Nations students.

UniLodge's whole-of-organisation model integrates housing with resident success, including study hubs, wellbeing sessions, and partnerships with universities for seamless integration. Our Residential Life Program is a structured engagement initiative to manage the welfare needs of Residents, with feedback gathered via annual surveys and continuous submissions, to ensure support evolves from resident needs. We partner with industry leaders for event support and harm-minimisation education, which contributes to safer social environments.

THE UNILODGE APPROACH
Standards 7.2(a) and (b)

UniLodge adopts a **whole-of-organisation, risk-based and primary prevention approach** to preventing and responding to Gender-based Violence (GBV), prioritising the safety and support of residents and accommodation staff.

This approach emphasises long-term cultural change to address the underlying drivers of GBV. We recognise GBV as existing on a continuum of violence, ranging from everyday sexism, harassment, and discriminatory behaviours to severe acts of sexual assault and physical violence.

Our actions are informed by evidence-based whole-of-institution models that promote gender equality and prevent violence by challenging rigid gender stereotypes, discrimination, and unequal power dynamics. We acknowledge that while environmental factors—such as policies, physical spaces, and organisational practices—can be directly influenced, deeper cultural beliefs and attitudes require sustained, collective and collaborative effort over time.

Proposed measures include targeted risk assessment, broad continuous education, trauma-informed and person-centred practices tailored to the student accommodation context, and a 'No Wrong Door' approach to disclosures, which supports choice and autonomy.

UniLodge is committed to delivering functional actions that drive real change, including strengthened reporting mechanisms, and dynamic policies and environments. This strategy prioritises continuous improvement through stakeholder engagement - at all levels - to refine support systems and reduce risk.

THE CONSULTATION PROCESS
Standards 7.2(d), 7.2(g) and 7.2(f)

WHAT WE DID

This Plan has been intentionally developed through engagement and collaboration with Residents, Accommodation Staff, and those who have experience Gender-based Violence. Each of these cohorts have provided unique and valuable insights, which have contributed to the Plan's design and implementation.

It is UniLodge's intention to reflect the needs, experience and agency of all members of the UniLodge community, and particularly those affected by Gender-based Violence.

Between 1 September 2025 and 15 December 2025, UniLodge conducted an extensive and inclusive consultation process across all Stakeholder groups in our community to thoroughly identify systemic risks, enablers, and barriers to preventing Gender-based Violence across our sites, while assessing opportunities for compliance with Standards 7.2–7.8 of the Code. This work included:

- Conference with a renowned clinical psychologist specialising in trauma recovery, to ensure the consultation approach is always trauma-informed and person-centred.

- Conducting ten (10) 1-on-1 interviews with Residential Life Managers (**RLMs**) and General Managers (**GMs**) across the portfolio, responsible for pastoral care of UniLodge Residents, to understand the criticality of their role, incidents and challenges in respect to Gender-based Violence response and support, and to identify systems and processes for uplift.

- Consultation with thirteen (13) Universities, to ensure alignment of policies and procedures, and to ensure robust pathways for collaboration to manage Disclosures and Formal Reports.

- Interview with the UniLodge Indigenous Advisor to understand how Gender-based Violence impacts First Nations people and to identify what culturally safe practices are required to support First Nations people who have intersectional vulnerabilities and sometimes complex needs.

- Workshops with approximately 100 Residential Advisors and Residential Assistants (collectively **RAs**) participants, who are both student residents and employees of UniLodge. These sessions focused on systemic risks within the accommodation environment, barriers to disclosure, cultural differences, the role of the Residential Assistant/Advisor, and lived experiences.

- Desktop Review of organisational policies, procedures, and data, including demographics, incidents reported in the last five years, student survey results for the last five years, training matrices, and built environment.

- Review of Gender-based Violence research in the public domain.

WHAT WE LEARNT - SYSTEMIC RISKS, ENABLERS AND BARRIERS

While incidents of Gender-based Violence were discussed with all participants, no names or other identifying information was shared, unless the individual who had experienced the violence provided their express consent in advance.

There was an overwhelming response to the invitation for UniLodge staff and residents to participate in the UniLodge Plan development process. Many different perspectives were obtained, and the following are the top findings from the enquiry process.

Notably, the data collected from within the community largely mirrored the existing research, whilst also expanding on several of the known risk factors and highlighting some context specific nuances across the portfolio.

There was an overwhelming response to the invitation for UniLodge staff and residents to participate in the UniLodge Plan development process. Many different perspectives were obtained, and the following are the top findings from the enquiry process.

1. Underreporting of Gender-based Violence is endemic and harmful.

Underreporting emerged as a central theme in every Resident Workshop (qualitative) and was identified as one of the most significant barriers to preventing Gender-based Violence across the community.

Failure to disclose GBV undermines prevention efforts in several critical ways:

- It distorts data accuracy, making it impossible to understand the exact scope of the issue or to design targeted prevention programs.

- It complicates resource allocation and justification.

- It allows cycles of violence to persist, placing individuals at greater risk.

- It prevents accountability, weakening and/or undermining broader prevention initiatives.

The most commonly cited reasons for non-disclosure were:

a. international students' fear that reporting GBV could jeopardise their visa status.

Information indicated that many international students prioritise the security of their Australian visa and misunderstand the implications of disclosing Gender-based Violence. In some cultures, there is shame associated with losing a Visa, and some international students feel beholden to their families who have made significant sacrifices to enable them to study in Australia. Often this is coupled with a fear or lack of trust in authority figures from past lived experience.

b. there can be shame in experiencing Gender-based Violence and fear of reprisal.

The concepts of shame and fear of reprisal were often raised as related. The feeling of shame is widely recognised in the research as a major barrier to disclosure. It was raised often in the context of international students who come to Australia from more conservative cultural backgrounds but was not exclusively attributed to this cohort. It was noted that shame prevents individuals not just from disclosing, but from seeking appropriate support. Fear of reprisal was raised in the context of backlash from the broader community in online forums, rather than from the alleged Respondent. A lack of general confidence in the ability to maintain confidentiality was also a contributing factor.

Conversely, several incidents of Gender-based Violence were alleged not to have been disclosed due to cultural norms around the behaviour and or the individual's belief that they could handle the matter independently.

c. students who experience culture and language barriers are more isolated, which impacts disclosure.

The issue of language barriers was raised in multiple contexts, including in a person's ability to adequately convey a Gender-based Violence experience and their ability to understand process and procedure. There was consensus about the need to improve processes for people from the CALD community.

d. there is a lack of clarity around disclosure and reporting pathways, including support services available.

At the end of every consultation, individuals were asked to provide one GBV Prevention 'wish-list' item. Several people requested a simple, uniform and accessible disclosure and reporting pathway for Gender-based Violence. Many indicated that a lack of easily accessible information on procedure was a barrier to reporting, which, coupled with the depletion of their internal resources as a result of the Gender-based Violence experience, caused the disclosure process to feel too onerous.

2. Gender-based Violence is conceptualised narrowly, which reduces awareness of the continuum of violence.

Every consultation started with the question: what is Gender-based Violence? Responses largely revolved around sexual abuse and sexual assault.

It was the interviewer's experience that participants were largely surprised at the spectrum of actions which can constitute Gender-based Violence. Moreover, only a small number of people identified that Gender-based Violence is deeply tied to unequal gender power relationships, rigid gender stereotypes and gender-discrimination.

As the consultation progressed, a list of frequently recurring events emerged including:

- Male Residents from CALD backgrounds refusing to interact, take advice and follow instructions from female Accommodation Staff,

- Existing domestic relationships causing fear in-residence, including from external partners and family members who were not co-located, including not in Australia,

- Alcohol and/or drug related sexual violence when the female was unable to consent, including against under-age student residents and CALD students,

- Male residents intentionally locking themselves out of their rooms and exposing themselves to female RAs when they arrived to help,

- Repeated requests for dates, and direct or implied propositions to young female CALD residents, often coupled with stalking behaviour, leering or staring,

- Comments or jokes about women in a language they cannot understand,

- Technology-assisted comments about a person's appearance, behaviour or asking about sexual history.

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3. Culture impacts vulnerability and action.

The issue of culture was consistently raised during the consultation process in two parallel contexts: (a) cultural background including race, religion, place of birth and socio-economic standing, and (b) culture of the accommodation environment. Taking each in turn:

a. cultural background including race, religion, place of birth, socio-economic standing.

Interviewees highlighted how cultural conditioning influences Residents' alignment (or otherwise) on gender and gender equality and can bring normalised Gender discrimination into the accommodation environment.

They spoke openly about some international students coming from cultures where women can be perceived as 'less than', gender-diversity is not acknowledged (and or permitted), and some degree of Gender-based Violence is accepted – impacting both the act of Gender-based Violence and the lack of reporting. This is often accompanied by a culture of distrust in institutional systems, grounded in students' historical experiences. Notably, this was also a prevalent concern for First Nations people.

Several Residential Life Managers and Residential Life Coordinators who had moved from regional locations – where the student population was mostly domestic – to urban sites – which were majority international students – reported being shocked at the abrasive disrespect some male residents had for female Accommodation Staff and student residents.

In short, the demographic makeup of the student Resident population at any site has the ability to impact how Gender and Gender-based Violence is regarded.

b. culture of the accommodation environment – including cultural norms.

The culture of the individual Residence also emerged as a factor which can either amplify or mitigate Gender-based Violence. Examples included the following:

i. A regional accommodation in Victoria reported a comparatively lower level of Disclosures. Contributing factors were proffered: most students were undertaking a four-year health science degree with strict penalties for subject failure – significantly reducing the party and drinking culture. Residents historically stayed in residence for most of their degree, meaning that they built community, and individuals were known to each other. This included the RA cohort, who were able to build visibility and relationships over time – fostering connectivity, and encouraging student Residents to bring problems to them.

This site was juxtaposed against centralised urban sites where large numbers of student Residents are on short-term exchange programs, and party culture prevails.

ii. The RLM at another regional site grouping noted that one of their four accommodations has lower levels of all round reports which was attributed to: most residents being from a singular conservative cultural background, amenities being within the Resident rooms (reducing interactions), and the residents choosing to live largely online.

iii. Conversely, they have another residence of mostly domestic students, with legacy ties to the accommodation, a significant drinking and party culture, and a higher number of known (albeit not reported) Gender-based Violence events. Another residence noted an ongoing hazing culture across the university, which significantly increased the risk for new and underaged students, by normalising coercion under the guise of "initiation." The first six weeks of semester were universally flagged as peak risk periods, when new students navigate unfamiliar living and study arrangements, and social environments.

iv. Another site noted that most of their domestic residents return home for long weekends on a regular basis, causing fewer opportunities for interaction.

No single cultural factor, or group of factors, emerged as determinative of whether a person would experience Gender-based Violence. Each needs to be considered in its context and addressed for Drivers and Enablers.

4. Location matters

Location was shown to influence the risk of Gender-based Violence in student accommodation. Specifically, the proximity (and use of) public transport, lighting and other amenities on pathways to and from residences, the availability of campus security to escort women students after dark, colocation with local nightlife, and for one site, being in the vicinity of a local army base.

Public transport emerged as a frequent risk point, with multiple disclosures of sexual harassment by women residents on buses, trains and within transport hubs. Pathways to and from residences (including for transport), particularly in off-campus areas, were highlighted for inadequate lighting and isolation, leading students to avoid certain routes after dark due to reports of stalking and harassment.

For two sites close to local nightlife, women residents reported concerns about leaving the accommodation on certain nights, for fear of sexual harassment. For the site near an army base, student leaders noted that multiple reports of Gender-based Violence were understood to involve a local army member attending university-populated bars.

Other personal safety incidents were raised in the context of some urban sites being in areas where there are high levels of local unhoused communities, some of whom repeatedly enter premises by tailgating residents after hours and causing fear through dangerous behaviour.

This underscored the need for location-specific safety measures like lighting audits, transport education, alcohol and drugs education and general situational awareness.

5. There is limited confidence in reporting

Student leaders across the interviewed cohort identified a lack of confidence in university reporting systems as one of the most significant barriers to preventing and responding to Gender-based Violence.

Leaders from across the portfolio cited repeated examples which the student population felt were poorly handled - including for perceived inaction, breaches of confidentiality (real or perceived), unclear or poorly communicated reporting channels, inconsistent policy application, and limited ongoing transparency when disclosures were escalated from the Accommodation to the university. These experiences fostered some anger and distrust among residents, creating a serious obstacle to future reporting, and the leaders' perception of their ability to provide ongoing wrap-around support to people who have experienced Gender-based Violence.

6. The role of the RA is central

The most interesting of all the findings was the pivotal role of the RA in preventing and responding to Gender-based Violence. The key insights we heard about the RA's role in this critical function were:

ii. **RAs are often the first to receive Disclosures** due to: being viewed as equals in the Accommodation context, a strong CALD representation among RAs that offers comfort and safety to CALD residents, heightened visibility during a resident's first six weeks influencing connection and access, the presence of women RAs (though disclosures come to all genders), long-term tenure building trust within the community, and 24-hour availability — with most disclosures occurring after hours and on weekends.

iii. **RAs need access to their own support services and ongoing capability uplift.** RAs acknowledged that there was sometimes an emotional cost to receiving Disclosures, that should be supported by a dedicated welfare process. As a cohort they value continuous, scenario-based training and quick-reference materials to support trauma-informed Disclosures and escalation pathways.

Ultimately, they want to provide the best possible environment for those who experience Gender-based Violence to be able to Disclose, while recognising the boundaries of their own involvement in any matter.

CONCLUSION

If the drivers of Gender-based Violence create the underlying conditions for it to occur, then the risk factors and enablers increase the likelihood and severity of incidents over time.

The consultation process identified that the factors in the student Accommodation environment largely mirror public research, **aligning on social isolation, alcohol, inaccessible or unclear reporting and intersectional vulnerabilities**.

Underreporting was universal, driven by **visa fears** (for international students), shame, **language and or cultural barriers**, and **confusing disclosure pathways** — skewing data, limiting proper resources allocation, and sustaining harm.

Culture, location, and the role of the RA helped to shape risk. Residents' cultural backgrounds influenced gender attitudes and trust, while residence norms (including party culture vs. community focus), and **the first six weeks** heightened vulnerability.

Accommodation near nightlife, unlit paths, or transport hubs increased harassment and fear. RAs were often first responders due to peer status, diversity, visibility, and 24/7 availability. However, they require support and training to be successful in the role. **Distrust in university reporting** — from perceived inaction, confidentiality concerns, and communication — frustrated disclosures.

Targeted actions in culture, clarity, safety, and RA support are essential to reduce GBV.

UniLodge

GENDER-BASED VIOLENCE

UNILODGE STRATEGIC ACTION PLAN 2026-2028

GENDER-BASED VIOLENCE
STRATEGIC ACTION PLAN 2026-2028

The table below outlines the actions that UniLodge will take to prevent and respond to Gender-based Violence across the whole organisation, in alignment with the National Higher Education Code to Prevent and Respond to Gender-based Violence (the Code), Standards 7.2 – 7.10.

These actions have been intentionally developed to address the systemic risks, barriers and drivers that contribute to Gender-based Violence, including factors relevant to UniLodge's operating context. They have been developed after deep research and consultation with a broad spectrum of the UniLodge community, including those who are disproportionately impacted by Gender-based Violence, including (but not limited to) women, First Nations people, CALD communities, people with disability and people of diverse sexual orientation and gender identity. UniLodge takes a primary prevention approach to Gender-based Violence.

1. EFFECTIVE GOVERNANCE AND A WHOLE-OF-ORGANISATION APPROACH, PRIORITISING SAFETY AND SUPPORT

Ref.	Action	Responsible	Timeline	Measure of Success	Risk Being Mitigated	Evidence
1.1	**Appoint a Gender-based Violence Executive Officer (GBV EO)**, responsible for implementation of the UniLodge Gender-based Violence Strategic Action Plan 2026-2028.	CEO	Q4 2025	Appointment made and onboarding complete; Role description finalised.	Absence of dedicated leadership causing fragmented, inconsistent, or delayed GBV response and prevention.	Per Code Requirement on Governance
1.2	Establish a **Gender-based Violence Oversight Committee** to guide the execution and review of the UniLodge Whole-of-Organisation Plan to Prevent and Respond to Gender-based Violence.	GBV EO	Q1 2026; quarterly meetings	Diverse committee established with Terms of Reference (ToR); 80% meeting attendance.	Lack of diversity and accountability causing fragmented efforts and missed follow-up.	Per Code Requirement on Governance
1.3	**Biannual Gender-based Violence briefing to the UniLodge Board** with Resident and Accommodation Staff voice input.	CEO	Q3 2026; annual thereafter	Briefing delivered; Board minutes record actions assigned.	Board and Executive decisions disconnected from resident lived experience.	Per Code Requirement on Governance
1.4	**Establish UniLodge policy** on Gender-based Violence that sets clear standards and accountability across the portfolio.	GBV EO	Q4 2025 (draft); Q1 2026 (Board approval & launch)	Policy published on website by 16 Jan 2026; review every 3 years in collaboration with key stakeholders; recommendations included in 3-year actions Plan.	Fragmented or absent GBV framework allows inconsistent and ineffective prevention and response across the portfolio. Outdated approach fails to reflect evolving Gender-based Violence risks, Code updates, or community needs.	Per Standard 7.4(c)(ii) and (iii)
1.5	**Integrate Gender-based Violence into organisational risk** register with quarterly Executive review.	COO	Q2 2026	GBV as standing risk item; mitigation actions tracked and reported quarterly.	Gender-based Violence not treated as a core risk, leading to reactive rather than preventive action.	Per Code Requirements for a Whole-of-Organisation Approach per Standard 7.2 and aligning with UniLodge risk-based approach.

Ref.	Action	Responsible	Timeline	Measure of Success	Risk Being Mitigated	Evidence
1.6	Embed **Gender-based Violence KPIs** into all senior leadership performance obligations.	CPO	Q3 2026	80% of senior leadership, at General Manager and above have GBV KPIs included in their performance review metrics for FY 2026/27; reviewed annually	Gender-based Violence not being afforded sufficient consideration in operational priorities.	Per Code Requirement on Whole-of-Organisation approach and UniLodge Policy on accountability
1.7	**Map existing UniLodge policies against the Code** and flag gaps in a one-page summary for Executive review.	COO	Q4 2025	Mapping complete; summary approved; gaps assigned for action.	Unidentified gaps between current practice and Code requirements.	Per Code Requirement on Whole-of-Organisation approach
1.8	**Review UniLodge Gender Equality Strategy** to address the drivers of Gender-based Violence and establish an action plan.	CPO	Q4 2025	Review existing gender equality strategies with uplift. Action Plan approved by Executive: Q1 2026 implemented; Q3 2028 review.	Persistent gender imbalances in employment eroding staff morale and modelling inequality to Residents.	Per Code Requirement on addressing systemic risks, barriers and enablers per Standard 7.2(d)

2. ENVIRONMENTS ARE SAFE, AND SYSTEMS CONTINUOUSLY IMPROVE

2.1	**Embed a working definition of Gender-based Violence** in UniLodge instruments (policies, procedures, student handbooks, education), including systemic risks, barriers and enablers.	CPO	Q1 2026	Updated definition approved and published; 100% residents/staff notified.	Student Residents and Accommodation Staff are not aware of the continuum of violence; Lack of understanding feeds prevalent under-reporting; enables drivers to persist.	Student leaders did not understand the spectrum of what constitutes GBV; subsequently raised multiple new incidents in consult: coercive control, stalking, intentional public nudity, refusing to engage with female staff, depravation of liberty, threats, sexual comments in another language.
2.2	**Accommodation Staff to declare any prior investigation and/or finding for Gender-based Violence** – in similar positions, or during the course of any employment or engagement as a contractor, or otherwise in a legal process.	CPO	Q1 2026; ongoing	100% Declarations completed by staff; Declaration imbedded into recruitment processes; 100% assessment of positive declarations for risks to role suitability;	Staff with undisclosed Gender-based Violence history undermine safety and trust.	Per Standard 7.4(a)(i) and (ii)
2.3	**Consider any substantiated allegation** of Gender-based Violence by Accommodation Staff in the course of their employment or engagement, in decisions on promotion and recognition.	CPO	Q1 2026; ongoing	Procedure updated; 100% promotion/recognition decisions include GBV check; flag blocks advancement until resolved.	Rewarding or promoting staff with Gender-based Violence history, increases risk and enables power imbalances that drive Gender-based Violence	Per Standard 7.4(a)(iii)
2.4	**Accommodation Staff to declare any existing or previous intimate personal relationship with a student Resident**.	CPO	Q1 2026; (initial declaration); ongoing at hire/change	100% staff declarations collected annually; disclosures reviewed ≤7 days; conflict-of-interest plan implemented ≤14 days.	Undisclosed staff-resident relationships creating power imbalances, and risk coercive control.	Per Standard 7.4(a)(iv) and (v)

Ref.	Action	Responsible	Timeline	Measure of Success	Risk Being Mitigated	Evidence
2.5	**Review the need to translate Gender-based Violence Policies and Procedures into different languages**, based on Resident Demographics and language barriers.	GBV EO	Q2 2026 (review); Q3 2026 (live)	Demographic analysis complete; translations published on website/ in ≥3 languages (incl English); test group confirms accessibility.	CALD Residents unable to access Gender-based Violence material and pathways.	Accommodation Staff reported multiple incidents of Residents advising that policies are too hard to read; avoid disclosures and reporting generally due to language barriers. Per Standard 7.4(c)(ii)H.
2.6	Actively promote and **make available information** about how student Residents and Accommodation Staff can access Gender-based Violence policies, procedures, and support.	Regional GMs	Q1 2026 (launch); ongoing	One-pager live on UniLodge Website; QR codes in common areas.	Individuals unaware of policies, procedures and support, leading to under-reporting or self-management.	Residents reported Googling how to get assistance, instead of approaching. Accommodation staff because they were not aware of the support. Per Standard 7.7(c)
2.7	**Collaborate with Providers to facilitate the open sharing of information** on Disclosure and Formal Report processes for consistency, transparency and wrap around support services	Regional GMs	Q1 2026 (protocol); ongoing	Protocols agreed with ≥50% Providers; 100% of response processes have ongoing updates shared between UniLodge and the Provider.	Student Residents fall through gaps when response and support is not shared.	Accommodation Staff repeatedly reported being unable to adequately support students Residents due to limited information about ongoing Disclosures / Reporting response held by a Provider.
2.8	**Introduce "safe exit" protocol** for student Residents at unacceptable risk, including rapid room swaps (where practical and in keeping with State tenancy legislation); access changes within 24 hours.	GMs	Q2 2026	Protocol documented; activations logged.	Individuals feel trapped increasing fear; individuals at physical or psychological safety risk, including risk of stalking, intimidation and reprisals.	RLMs and RAs raised multiple instances across sites where it was necessary to move student Residents who had experienced or were at risk of experiencing Gender-based Violence, including from external parties in domestic violence and coercive control situations.
2.9	**Residential Advisor/ Assistant (RA) cohorts to generally reflect the Accommodation's student resident demographic** - where practical, and subject to the merit of applicants, and in compliance with right to work.	GMs	2023; ongoing	Cohort analysis by 30 September each year; Report to the GBV EO by 31 March;	Student Residents feeling isolated due to a lack of identification with student leadership; gender inequality driving GBV.	UniLodge portfolio population is ≥55% women; inequality drives GBV; consensus that student Residents Disclose when they see themselves in leadership, and feel culturally safe.
2.10	**Uplift annual Resident experience surveys** to incorporate targeted questioning on Gender-based violence concerns, including Accommodation specific risks.	BNE Operations Manager	May 2026; annually	Survey completed ≥50%; ≥70% of identified risks addressed within 12 months, where practicable.	Resident experience not adequately sought; risks going unaddressed for an unacceptable amount of time due to lack of information.	General Managers and RLMs noted that their ability to address risk factors will often depend on resident feedback, which is inconsistent.
2.11	Partner with a third-party provider to **facilitate alcohol and drugs education.**	CPO	Q1 2026; biannually	Education provided to 100% of Residents	Excessive drugs and alcohol culture increases vulnerability.	Student leaders raised multiple Gender-based Violence Disclosures involving alcohol at off-site parties; often concerning first year students and international students who have limited experience with substance and parties; and occurring in the first six weeks of residential life.

Ref.	Action	Responsible	Timeline	Measure of Success	Risk Being Mitigated	Evidence
2.12	**Provide new students with information about safety on public transport** during orientation.	GMs	Q1 2026; all orientation periods	100% of new students receive information about public transport safety; student Handbooks updated.	New residents unaware of Gender-based Violence risks or reporting options on transit routes	Multiple reports from different Accommodations about theft, assault, sexual harassment and sexual assault on public transport, while travelling to and from the Accommodation.
2.13	**Review non-student visitor policy and procedure** at each site for safety measures; **enforce tailgating prevention** for Residents and Accommodation Staff.	GMs	Q2 2026	Policy reviewed and updated; 100% Accommodation Staff training; reduction in unauthorised entries.	Non-UniLodge community members posing a risk to Residents and Accommodation Staff on premises.	Multiple instances across the portfolio of non-community members being involved in Gender-based Violence incidents including domestic partners, locals, non-Resident students; instances at some PBSAs of criminal activity onsite due to tailgating after hours.
PHYSICAL SITE ACTIONS						
2.14	**Conduct annual safety and security audit** of all sites across the portfolio to ensure requirements are being met.	Regional GMs	April 2026 review; October 2026 peer review; annually	Audit report issued within 30 days of site visits; ≥70% of non-compliances actioned within 3 months.	Hidden safety gaps enable Gender-based Violence incidents.	Unsecured access to sites enables non-Residents to access Accommodation.
2.15	**Map dark spots / blind corners** via maintenance audit for targeted lighting upgrade consideration. For campus-based Accommodation, work with the Provider to address gaps.	GMs	Q2 2026	Integrated into the site risk assessment; Pathways around the Accommodation are sufficiently lit; resident safety score ↑15%.	Poor visibility enabling fear, stalking or assault in transitional areas.	Students avoid certain routes after dark due to isolation and 'near-miss assaults'. Several people identified pathways to and from public transport as a source of incidents.
2.16	**Disable access fobs within 24 hours** of any termination of residency or employment	GMs	Q1 2026	100% of fobs deactivated ≤24 hours from exit date; monthly audit shows zero active fobs for former residents and staff.	Former residents or unauthorised persons retaining building access after moving out.	Per Code Requirement on safe environments – per Standard 2.
2.17	**Maintain robust key-card access audit** protocol.	GMs	Ongoing Q1 2026	Protocol documented; regular review with 100% of unusual activity investigated.	Unauthorised access to facilities and rooms.	Several incidents across sites involving stalking around Accommodation.
2.18	Collaborate with Providers at on-campus Accommodation to complete an **audit of CCTV resources; establish CCTV access protocols.**	GMs	Q2 2026	Protocol agreed with ≥5 campus partners; ≥80% cross-site requests fulfilled ≤2 hour (logged).	Delayed ability to ensure safety and security of all Residents and Accommodation Staff	RLMs stated that their ability to access CCTV for on-campus Accommodation is limited by ownership sitting with the Provider and their relationships within that Provider's security function.

Ref.	Action	Responsible	Timeline	Measure of Success	Risk Being Mitigated	Evidence

3. BUILD KNOWLEDGE AND CAPABILITY

Ref.	Action	Responsible	Timeline	Measure of Success	Risk Being Mitigated	Evidence
3.1	Introduce **mandatory Gender-based Violence training for all Accommodation Staff;** increase awareness of what drives and constitutes Gender-based Violence; includes responding to disclosures.	CPO	Q4 2025; annual refresh	80% staff completion with a recognised expert training provider; ≥50% knowledge gain via post event survey; end-March reporting to the Board.	Staff mishandling disclosures or missing early signs from lack of education.	Multiple reports of inconsistent education and training across staff cohorts have led to confusion for disclosure and inconsistent response; per Standard 7.5(a)
3.2	Facilitate **mandatory Gender-based Violence education to all student Residents**, increase awareness of what drives and constitutes Gender-based Violence; includes responding to disclosures.	CPO	Q1 2026 (pilot) – 31 March review; Q2 2026 full rollout	≥75% resident participation with a recognised expert training provider; evaluation shows ≥30% increase in knowledge.	Lack of understanding of what constitutes Gender-based Violence allows incidents to persist or go unreported.	Consistent reports of Gender-based Violence not being disclosed because individuals are not aware of the spectrum of unacceptable behaviour; per Standard 7.5(a)
3.3	Create **digital Gender-based Violence resource hub accessible** via the UniLodge website, with multilingual translations where practicable.	Comms & Marketing	Q2 2026 (live); Q4 2026 (translations)	Hub live; test group confirms accessibility.	Student Residents search unreliable online sources.	Reports of student Residents being unsure where to access information and resources; per Standard 7.5(b)
3.4	Provide all frontline staff with a **palm-sized "GBV First Response" card.**	CPO	Q2 2026	100% staff issued	Accommodation Staff mismanage disclosure processes causing harm.	Accommodation Staff report difficulty in remembering process during high stress incidents.
3.5	Partner with Providers to promote Gender-based Violence **campaigns throughout the year.**	GMs	Q1 2026; campaigns run annually	Promote ≥ 5 Gender-based Violence Campaigns across the year in Accommodation.	GBV awareness limited to one-off training and education events, allowing silence to enable Gender-based Violence normalisation.	Students asked for ongoing education for the Resident cohort to ensure Gender-based Violence prevention was consistently front of mind for students who are busy with multiple pressures; per Standard 7.5(c)

Ref.	Action	Responsible	Timeline	Measure of Success	Risk Being Mitigated	Evidence

4. RESPONSES AND SUPPORT SERVICES ARE SAFE AND PERSON-CENTRED

Ref.	Action	Responsible	Timeline	Measure of Success	Risk Being Mitigated	Evidence
4.1	Establish **multiple channels to facilitate Disclosure and Formal Reports** of Gender-based violence including in person, by email, by phone and online, including the option to remain anonymous	GBV EO	Q1 2026	Three (3) channels live; channel usage logged; 100% of online disclosures offered anonymity option; 100% of disclosures receive a response within 48 hours.	People who experience Gender-based violence are unable to report in their preferred way, leading to silence.	Advice from those with lived- experience is that people disclose in a manner and at a time that is suitable to them. They require options to better to changes of Disclosure. Per Standard 7.4(c)(ii)F.
4.2	Establish **Response procedures that are trauma-informed, culturally safe and person-centred,** which provide persons who have experienced Gender-based Violence with agency and choice, and do not require them to share their story repeatedly.	GBV EO	Q1 2026	Procedure published; single-point Authorised Person (case coordinator) assigned to 100% of disclosures; low levels of retelling.	Re-traumatisation from loss of control of the process, loss of anonymity, repeated retelling, cultural misunderstandings.	Advice from those with lived experience is that they need control throughout the disclosure and support process. Per Standard 7.7(a)
4.3	Enable Accommodation Staff to provide individuals with **immediate support without requiring a Formal Report.**	GMs	Q1 2026	Accommodation staff are comfortable in their options to provide immediate support; all supports able to be actioned within 24 hours.	Individuals avoid seeking support because they are conserved about having to make a Formal Report.	Some people with lived experience reported being confused about having to provide evidence before they could receive support. Per Standard 5.5
4.4	Maintain **collaborative relationships with Providers to ensure individuals receive holistic, wrap around support** services.	GMs	Q1 2026 and ongoing	100% of referred cases have warm hand-off logged; Accommodation Staff report timely support.	Fragmented care leaving gaps in wellbeing, housing and academic support leading to further harm.	Concerns by pastoral care staff about individuals falling through the gaps because the Accommodation does not receive transparent and timely information from the Provider. Per Standard 7.7(b)
4.5	Ensure all **data reporting is de-identified and processes preclude the sharing of personal information without consent**, or only in circumstances of risk of harm.	GBV EO	Q1 2026	100% of reports de-identified in system; consent form signed or risk-of-harm justification logged for every share without consent.	Privacy breaches eroding trust in reporting, leading to under-reporting.	Student Leaders reported significant fear of disclosure because of shame and potential reprisals, noting that the university community is small and intertwined. Incl. Standard 6.2.

5. GENDER-BASED VIOLENCE RESPONSES ARE SAFE AND TIMELY

Ref.	Action	Responsible	Timeline	Measure of Success	Risk Being Mitigated	Evidence
5.1	Establish **Disclosure pathways that are accessible 24/7,** with the ability to refer to emergency services if risk of immediate harm.	COO	Q1 2026	24/7 online Disclosure pathways + phone lines live; 100% high-risk cases escalated to 000/police within 15 mins (logged).	Insufficient afterhours pathways put people in immediate risk of harm.	Information from across the RA workshops states people disclose when they want, and frequently at nights and on weekends.

Ref.	Action	Responsible	Timeline	Measure of Success	Risk Being Mitigated	Evidence
5.2	**Establish the role of the Authorised Person (AP)** being a member of the UniLodge staff at Manager level or above, who has been designated to manage Disclosure and Formal Report procedures.	CPO	Q1 2026	≥10 Authorised Persons identified and training to receive disclosures; 100% disclosures assigned to an AP within 12 hours.	No staff currently qualified to assess risk or coordinate support under the Code.	Per Code Requirement on Risk Assessments per Standard 3.14, 7.7(d) and 7.7(e)(iii).
5.3	**Set response service standards**; acknowledgement within 48 hours if disclosure made-online; immediate safety assessment within 6 hours; immediate safety actions within 24 hours; Risk Assessment within 48 hours; Support Plan within 48 hours; ongoing monitoring as determined by the Authorised person.	GBV EO	Q1 2026	Service standards achieved in ≥80% cases; logged in system.	Delays at any stage of the response process can escalate risk and erode trust, increasing harm.	Per Code Requirement on Accessible Disclosure pathways and response timeframes. Incl. Standard 7.7(e)(iii)(A.), (E.) and (F.)
5.4	**Embed site specific information for local support, crisis centres and sexual assault service**, in Resident Handbooks for 24/7 referral.	GMs	Q1 2026; annual review	100% of Handbooks updated and accessible	No specialist support after outside of business hours.	Accommodation Staff advised that the overwhelming majority of Disclosures occur outside of Office and Provider hours, so that specialist services is available.

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

Ref.	Action	Responsible	Timeline	Measure of Success	Risk Being Mitigated	Evidence
6.1	Deploy Gender-based Violence **record keeping and data tracking system for disclosures** capturing (at a minimum): type and number of incidents, response times, demographics, location, support services, Risk Assessment, Support Plans, referrals, and trends.	GBV EO	Q1 2026	Dashboard live; 100% disclosures logged within 48 hrs; quarterly trend reports to Oversight Committee.	Blind spots in systemic risks, barriers, enablers and patterns delaying prevention; inconsistent record keeping and record keeping outside of best practice can cause trauma.	Accommodation Staff report inconsistent recording of disclosures, and particularly when they originate with Providers
6.2	Conduct **annual anonymous resident climate survey on Gender-based Violence prevalence and safety perception**; separately embed data from the pending National Student Safety Survey 2026.	COO	Q2 2026; annually	≥40% response rate; findings presented to Oversight Committee within 60 days; action plan updated with top 3 issues addressed.	Issues unable to be addressed without current student Resident-led data; residents only disclosing extreme events.	National Student Safety Survey was last conducted in 2021, post Covid. The environment has changed since then.
6.3	**Share de-identified aggregate data with Providers** on a biannual basis.	COO	Q2 2026; bi-annually	Data submission confirmed by recipient; feedback loop closed within 30 days.	UniLodge operating in isolation from sector trends.	Per Code requirements on reporting – Standard 6
6.4	**Participate in national GBV accommodation industry forums** to share learnings and adopt best practice;	COO	Q1 2026; ongoing	UniLodge representative attends ≥1 forums/year;	Reinventing the wheel or missing proven solutions.	Per industry Good Practice.
6.5	**Establish post disclosure debrief protocol** (30-min structured review within 7 days) to capture learnings for capability and approach uplift, and to maintain wellbeing of individuals who receive a Disclosure.	COO	Q1 2026; reviewed by incident	100% of disclosures debriefed; improvement actions logged and actioned within 3 months.	Repeating same response errors risks harm.	Per industry Good Practice.

GENDER-BASED VIOLENCE OUTCOMES FRAMEWORK 2026-2028

Based on the actions above, the below table outlines the outcomes UniLodge is seeking to achieve and indicates how progress towards these outcomes will be tracked over time.

Outcome	Sub-outcomes	Indicators	Measures (impact or progress)
Effective governance and a whole-of-organisation approach, prioritising safety and support, in the prevention of and response to gender-based violence	1.1 Appoint a Gender-based Violence Executive Officer (GBV EO), responsible for implementation of the UniLodge Gender-based Violence Strategic Action Plan 2026-2028	Role description finalised.	Dedicated leadership in place.
		GBV EO appointed and onboarded.	Executive accountability for GBV outcomes.
	1.2 Establish a Gender-based Violence Oversight Committee to guide the execution and review of the UniLodge Whole-of-Organisation Plan	Oversight Committee established with Terms of Reference (ToR); Representation from diverse leadership, Accommodation Staff, and student Residents.	Active cross-functional oversight; lived experience input where practicable.
		Quarterly meetings to review previous quarter's data; ≥80% attendance.	Implementation and effectiveness monitored for continuous improvement.
	1.3 Biannual Gender-based Violence briefing to the UniLodge Board with Resident and Accommodation Staff voice input	Board papers submitted and minutes reflect discussion; forward actions approved and assigned.	Board and Executive decisions informed by resident and staff experience
			Community feels heard; impacts change
	1.4 Establish UniLodge policy on Gender-based Violence that sets clear standards and accountability across the portfolio	Policy published on website by 16 Jan 2026; 3-year review cycle in place.	Clear, current, portfolio-wide GBV policy framework
			Community aware that GBV is unacceptable.
	1.5 Integrate Gender-based Violence into organisational risk register with quarterly Executive review	GBV as standing risk item; Mitigation actions tracked and reported quarterly.	GBV treated and managed as a core organisational risk
			Primary Risk Approach embedded.
	1.6 Embed Gender-based Violence KPIs into all senior leadership performance obligations	≥80% performance reviews for senior leaders (General Manager and above) have GBV KPIs imbedded; reviewed annually	Leadership accountability for GBV prevention across their function.
	1.7 Map existing UniLodge policies against the Code and flag gaps in a one-page summary for Executive review	Mapping complete and one-page summary approved; Gaps assigned for action	Gaps between current practice and Code requirements identified and actioned (if any)
	1.8 Review UniLodge Gender Equality Strategy to address the drivers of Gender-based Violence and establish an action plan	Updated strategy and action plan approved and implemented; 2 yearly cycle review.	Systemic gender-equality drivers of GBV actively addressed.
			Primary prevention approach embedded.

Outcome	Sub-outcomes	Indicators	Measures (impact or progress)
Environments are safe, and systems continuously improve to prevent and respond to gender-based violence	**2.1 Embed a working definition of Gender-based Violence in all UniLodge instruments**	Definition approved, published and notified to 100% residents/staff.	Shared organisational understanding of GBV continuum and drivers
			Consistent response to Disclosures
	2.2 Accommodation Staff, and prospective staff, declare prior GBV investigations and findings	100% declarations by current Accommodation staff completed; positive declarations assessed for role suitability.	Accommodation Staff with GBV history Staff with prior GBV identified and appropriately managed.
		Requirement embedded in recruitment processes (pre-offer).	Primary prevention approach embedded; signal to community.
	2.3 Substantiated GBV allegations considered in promotion/ recognition decisions	Procedure updated; 100% promotion/recognition decisions include GBV check	Substantiated GBV findings are not eligible for promotion or recognition until resolved
	2.4 Accommodation Staff declare intimate relationships with student Residents	100% annual declarations collected	Potential power-imbalance relationships managed.
		Disclosures reviewed ≤7 days; conflict-of-interest plan implemented ≤14 days.	
	2.5 Consider translation of GBV policies/procedures based on resident demographics	Translations published and accessible in ≥3 languages	CALD persons can access critical GBV information
			Reduce isolation for CALD persons
	2.6 Actively promote access to GBV policies, procedures and support	One-pager and QR codes live in common areas and on website	High awareness of support pathways
			Support accessed as needed
	2.7 Collaborate with Providers on Disclosure/Formal Report processes	Protocols agreed with ≥50% Providers	Seamless information-sharing and support across organisations
			Timely provision of safety support
			Timely progress of investigations
	2.8 Introduce "safe exit" protocol	Site specific protocol documented	Rapid safety options available when needed
		100% actions logged and reviewed	

Outcome	Sub-outcomes	Indicators	Measures (impact or progress)
Environments are safe, and systems continuously improve to prevent and respond to gender-based violence	2.9 RA cohorts generally reflect resident demographic	Annual demographic analysis completed	Representative and culturally safe student leadership
		Representation considered in appointment #CHECK	Student leadership promotes equality
	2.10 Annual resident surveys include targeted GBV questions	Survey response ≥50%	Resident voice drives continuous risk reduction
		≥70% identified risks addressed within 12 months	
	2.11 Alcohol and drugs education delivered	Education provided to 70% residents	Reduced substance-related vulnerability
	2.12 Public transport safety information at orientation	100% new students receive local information within 2 weeks of entry	New residents aware of transit risks and reporting options
	2.13–2.18 Physical site safety actions (security audits, lighting review, fob deactivation, visitor policy, CCTV, etc.)	Audits completed annually;	Physical environment continuously safer and more secure;
		≥70% non-compliances actioned with three (2) months	
		Fobs deactivated ≤24 hrs;	Reduction in reports related to built environment.
		Visitor protocols enforced	
Build knowledge and capability to safely and effectively prevent and respond to gender-based violence	3.1 Mandatory annual Gender-based Violence training for all Accommodation Staff, including bystander training and responding o disclosures	≥80% completion prior to the start of the university semester, or within 2 weeks of commencement for new staff.	Staff confidently and consistently recognise indicators of Gender-based Violence (including drivers) and respond appropriately to take pre-emptive preventative action and respond to disclosures in a trauma-information and person-centred manner.
		≥80% knowledge gain (post-survey)	
	3.2 Mandatory GBV education for all student Residents	≥75% completion within 2 weeks to the university semester commencement	Student residents understand the drivers, contributors and continuum of Gender-based Violence; student residents understand how to respond to disclosures in a trauma-information and person-centred manner.
		≥80% knowledge increase	
	3.3 Digital GBV resource hub, with multilingual instruments where practicable within 2 years	Hub-live and accessibility confirmed by test group	Reliable 24/7 resources readily available

Outcome	Sub-outcomes	Indicators	Measures (impact or progress)
Build knowledge and capability to safely and effectively prevent and respond to gender-based violence	3.4 Palm-sized "GBV First Response" card for frontline staff	100% frontline staff issued within 2 weeks of the university semester, or within 2 weeks of commencement for new staff.	Consistent, calm first-response quality across the portfolio
			Accommodation Staff feel confident and supported in responding to incidents
	3.5 Year-round GBV campaigns with Providers	≥5 campaigns promoted annually	Ongoing community awareness and prevention messaging
Responses and support services are safe and person-centred	4.1 Multiple Disclosure/ Formal Report channels including anonymous option	≥3 channels live	Accessible, low-barrier reporting offering choice and agency to disclosers
		100% online disclosures responded to ≤48 hrs	
		Anonymity option live with 24/7 access	
	4.2 Trauma-informed, culturally safe, person-centred response procedures	Procedure published online	Minimal re-traumatisation, maximum agency, and proper support for people who have experienced Gender-based Violence
		Single-point coordinator assigned to 100% cases	
	4.3 Immediate support provided without requiring Formal Report	Accommodation staff confident in being able to facilitate support without requirement to obtain details	No delay in safety or wellbeing assistance
		Necessary supports actioned ≤24 hrs	Remove fear / barrier of having to make a Formal Report in order to receive access to support services
	4.4 Collaborative relationships with Providers for wrap-around support	100% warm hand-offs logged	Holistic, coordinated care
	4.5 Strict privacy and de-identification of data	100% reports de-identified by an established process with access limited to restricted necessary cohort.	Individual privacy and confidentiality maintained; trust in the system maintained.
		Consent to disclose or risk-of-harm disclosure justification logged for every incident	
Gender-based violence responses are safe and timely	5.1 24/7 Disclosure pathways with immediate escalation capability	24/7 phone pathway live;	Significant reduction in after-hours response gaps and crisis support provision.
		100% high-risk cases escalated to 000/police within 15 mins (logged).	

Outcome	Sub-outcomes	Indicators	Measures (impact or progress)
Gender-based violence responses are safe and timely	**5.2 Designated Authorised Persons**	≥10 trained Authorised Persons before start of semester 1 2026	Qualified person responsible for all case management from the beginning, alleviating responsibility on others and ensuring consistent and proper support pathway for the Discloser
		100% disclosures assigned ≤12 hrs	Qualified singular coordination for every disclosure
	5.3 Published response service standards	Standards are Code compliant	Predictable response pathways provide efficiency and certainty which reduces harm
		Standards met or exceeded in ≥80% cases	
	5.4 Site-specific local support information in handbooks	100% handbooks updated annually	Immediate specialist referral options available so that individuals do not need to wait to receive support
Use evidence to approach, measure change and contribute to the national evidence-base	**6.1 GBV data tracking system established**	System live	Data-driven insight into systemic risks and patterns to drive continuous improvement
		100% disclosures logged ≤48 hrs	
		Quarterly trend reports	
	6.2 Annual anonymous resident climate survey	≥40% response rate	Resident voice embedded in continuous improvement purpose
		Findings presented to oversight Committee within 60 days; action plan updated with top 3 issues.	Resident-led priorities continuously inform practice
	6.3 Biannual de-identified data sharing with Providers	Data shared and feedback loop closed with 30 days.	Sector benchmarking and collaboration
	6.4 Participation in national GBV forums	≥1 forum attended per year	Contribution to national best practice
	6.5 Post-disclosure debrief protocol	100% disclosures debriefed within 7 days	Staff wellbeing protected; continuous learning opportunities harnessed
		Improvements actioned ≤3 months	Continuous improvement opportunities implemented

UniLodge

DEFINITION

Gender based Violence means any form of physical or non-physical violence, harassment, abuse or threats, based on gender, that results in, or is likely to result in, harm, coercion, control, fear or deprivation of liberty or autonomy, and where the conduct is:

(a)   Driven by unequal gender power dynamics or relationships, and/ or

(b)   Connected to gendered expectations or stereotypes, and/ or

(c)   Extended to Gender Identity and/or expression.

MISSION STATEMENT

At UniLodge, we are committed to providing safe, inclusive, and supportive living environments for all residents, staff, and visitors.

UniLodge adopts a proactive, evidence-informed, and risk-based approach to the prevention and response of Gender-based Violence, prioritising the safety, dignity, and autonomy of those impacted.

Gender-based Violence in any form is unacceptable and will not be tolerated in the UniLodge community.

Through strong leadership, clear policies, ongoing education, accessible support, and robust accountability, UniLodge maintains a culture of respect, equity, and responsibility across our student accommodation portfolio.

PRINCIPLES

UniLodge adopts five (5) core principles in working to prevent Gender-based Violence:

1. **Safety First**: Safety and wellbeing are the overriding priorities in all decisions and actions.

2. **Accountable Leadership**: UniLodge leaders own this policy, model respectful behaviour, drive prevention, and ensure measurable progress and continuous improvement.

3. **Education is Critical**: Continuous evidence-based education is coupled with robust ongoing assessment to identify systemic risks, enablers, and barriers, with measurable, action-based targets to ensure safe environments.

4. **Person-Centred and Trauma-Informed Systems**: All processes are designed to be trauma-informed, person-centred, and culturally safe. The agency and confidentiality of the person who has experienced harm are upheld, and procedural fairness is maintained for all parties. Through collaboration with universities and the UniLodge community, our systems are designed for transparency, integrity, and impactful consultation.

5. **Shared Responsibility**: Every member of the UniLodge community has a role in preventing Gender-based Violence and fostering a respectful environment.

ROLES AND RESPONSIBILITIES

All Members of the UniLodge Community (residents, staff, visitors, and contractors): Every person in our community plays an active role in preventing and responding to Gender-based Violence by:

- Promptly disclosing any incident or concern involving Gender-based Violence.

- Completing all mandatory education, orientation sessions, workshops, and awareness campaigns.

- Consistently modelling respectful, inclusive, and equitable behaviour and, where it is safe to do so, using ethical bystander intervention to support others.

- Contributing honest feedback through anonymous surveys, focus groups, and forums to help shape policies and practices.

Accommodation Staff (in addition to the above): Frontline and residential staff are required to:

- Actively participate in regular, ongoing training on prevention, recognition, and trauma-informed response to disclosures.

- Follow all Gender-based Violence procedures, and support colleagues and residents to do the same.

- Engage in regular wellbeing check-ins and access professional support to manage vicarious trauma and maintain their own capacity to help others.

UniLodge Leadership (Executive and Senior Management): Leadership is accountable for:

- Owning, championing, and regularly reviewing this policy and its implementation.

- Proactively addressing the known drivers of gender-based violence and ensuring full compliance with relevant legislation and standards.

- Ensuring all residents and staff have ongoing access to high-quality education and training.

- Ensuring that disclosure and reporting pathways are safe, trauma-informed, person-centred, culturally safe, and accessible — particularly for women, First Nations people, CALD communities, people with disability, and people of diverse sexual orientation and gender identity.

- Regularly seeking and acting on community feedback and maintaining strong collaboration with university partners and other providers.

- Publishing transparent, measurable progress reports to the UniLodge Board.

Gender-Based Violence Executive Officer: The designated Executive Officer is responsible for:

- Implementation of the UniLodge Gender-based Violence Strategic Action Plan 2026-2028.

- Coordinating the rollout of the policy, education programs, system uplift, and budget allocation.

- Facilitating annual risk assessments and data collection to identify and mitigate emerging risks.

- Leading a formal policy review at least every three years, incorporating community consultation and independent expert input where needed.

ROLES AND RESPONSIBILITIES

A breach of this Policy may result in action by UniLodge. Alleged or actual conduct by staff, residents and contractors that constitutes Gender-based Violence will be handled in accordance with the UniLodge Gender-based Violence Procedure. It may also fall under the relevant Code of Conduct, UniLodge Grievance and Complaints Procedure, Workplace Health and Safety Policy, or the relevant Resident Handbook, as applicable.

Any reports of non-compliance with this policy must be made in writing to feedback@unilodge.com.au.

This Procedure supports UniLodge's compliance with the National Higher Education Code to Prevent and Respond to Gender-based Violence 2025.

Vicki Nagle
Chief People Officer
December 2025

GENDER-BASED VIOLENCE

UNILODGE RESPONSE PROCEDURE

TABLE OF CONTENTS

DEFINITIONS

UniLodge adopts the following definitions:

Accommodation Staff means any person who is employed or engaged by a UniLodge and who's employment or engagement is in direct relation to a student Accommodation/s, including but not limited to Regional Managers, General Managers, Residential Life Managers, Residential Life Advisors/Assistants, Maintenance Staff, and equivalents, including in a non-paid capacity.

Accredited Specialist means a person who meets the following criteria:

a. a psychologist, social worker or counsellor registered or accredited with their relevant industry body; and

b. has undertaken formal training in supporting people affected by Gender-based Violence, including Trauma-informed practice; and

c. has undertaken training to build competency in working with specific cohorts including First Nations people, culturally and linguistically diverse communities, people with disability and people of diverse sexual orientation and gender identity.

Authorised Person means a member of the UniLodge staff at Manager level or above, who has been designated to manage Disclosure and Formal Report procedures, and who has undertaken the required training to receive disclosures and undertake a Gender-based Violence Risk Assessment.

Code means the National Higher Education Code to Prevent and Respond to Gender-based Violence (2025).

Consent means a voluntary, active agreement by an unimpaired person. No one impaired by drugs, alcohol, sleep, or fear can give consent. An absence of the word 'no' does not mean there is consent, nor do non-affirming phrases. Consent can be revoked at any time.

Discloser means a person who has shared information about their experience of Gender-based Violence.

Disclosure means the provision of information about a person's experience of Gender-based Violence to UniLodge by the Discloser or any other person.

Formal Report means the provision of a statement about an experience of Gender-based violence that triggers consideration of an investigation process, beyond the provision of support services.

Gender-based Violence means any form of physical or non-physical violence, harassment, abuse or threats, based on gender, that results in, or is likely to result in, harm, coercion, control, fear or deprivation of liberty or autonomy, and where the conduct is:

a. Driven by unequal gender power dynamics or relationships, and/ or

b. Connected to gendered expectations or stereotypes, and/ or

c. Extended to Gender Identity and/or expression.

Intersectionality means the interconnected nature of social categorisations including gender, race and class, which create overlapping and interdependent systems of discrimination or disadvantage.

Person-centred means ensuring that the needs and preferences of a person who discloses an experience of Gender-based Violence are at the centre of decisions made in response to a Disclosure. The response affirms the individual's dignity and supports their healing by genuinely considering their wishes and the impact that decisions may have on them, while at all times ensuring the safety and wellbeing of the UniLodge community broadly.

Procedural Fairness in a decision-making context, means the decision is made in accordance with the rule against bias and the hearing rule (i.e., a Respondent is given an opportunity to present their case with knowledge of any prejudicial material that may be taken into account by the decision-maker).

Resident means a person that resides in Student Accommodation.

Respondent means a person whom it is alleged has engaged in conduct that amounts to Gender-based Violence

Risk Assessment has the meaning given to it by the Code.

Support Plan has the meaning given to it by the Code.

Trauma-informed means an approach that applies the core principles of safety (physical, psychological and emotional), trust, choice, collaboration and empowerment. It should minimise the risk of re-traumatisation and promote recovery and healing to the greatest extent possible.

INTRODUCTION

PURPOSE

1. This procedure prescribes how UniLodge will support Disclosers and those who experience Gender-based Violence, as well as Respondents to allegations of Gender-based Violence, including how it will manage the process for Disclosures and Formal Reports.

2. UniLodge acknowledges that people of all genders can experience Gender-based Violence, harm, or abuse, and that women, First Nations people, CALD communities, people with disability and people of diverse sexual orientation and gender identity are disproportionately affected.

3. UniLodge also acknowledges that intersectionality can increase a person's vulnerability to inequality, discrimination and Gender-based Violence.

4. UniLodge is committed to addressing the systemic risks, enablers and barriers to preventing Gender-based Violence, including the provision of a safe, trauma informed, person-centred, accessible and robust Response Procedure.

AUTHORITY

5. Authority for this procedure is established under the UniLodge Gender-Based Violence Policy.

6. For the avoidance of doubt, where the Accommodation is directly owned, operated or managed by a university, and in circumstances where this procedure conflicts with the commensurate policy of the University, the University's procedure will take precedence for the purposes for Standard 7.1 of the Code, and UniLodge will adopt the University's Policies and Procedures.

SCOPE

7. This procedure applies equally to all members of the UniLodge community, including employees, Residents and third parties.

8. If Gender-based Violence is disclosed or reported outside the scope of this procedure, UniLodge will use its best endeavours to provide appropriate support services, including referrals to Accredited Specialists.

9. The UniLodge Child Protection Policy takes precedence over this procedure to the extent of any inconsistency regarding the protection of children.

10. To the extent of any inconsistency between this procedure and the commensurate procedure of a relevant University, and specifically where the accommodation falls under Standard 7.1 of the Code, the University' policies and procedures will take precedence.

OVERARCHING PRINCIPLES

11. Disclosures and Formal Reports must be received and managed in a safe, trauma-informed, person-centred, and accessible way. The choices and consent of the Discloser or person who has experienced Gender-based Violence are the paramount consideration.

12. UniLodge will make every effort to protect individuals' privacy and confidentiality at all times. Information may be shared in limited circumstances, to support internal decision-making, or otherwise with the Police, when there is a risk to the safety and wellbeing of the UniLodge community, including the individual identified.

13. Where information cannot to be provided in a de-identified format, including for mandatory reporting obligations, UniLodge will consult with the relevant individual prior to the information being shared, and will take every effort to respect privacy and minimise trauma.

DISCLOSURES

DISCLOSURE PATHWAY

14. In an emergency, or in circumstances of immediate danger, immediately contact the State Police and relevant emergency services by calling triple-zero (000). Contact Campus Security if the accommodation is located on a University's Campus, or if arrangements with the University facilitate Campus Security to attend.

15. Any person who wants to disclose Gender-based Violence or harm is encouraged to contact an Authorised Person irrespective: of whether they want to make a Disclosure or Formal Report; where or when the Gender-based Violence or harm occurred; if they want to remain anonymous.

16. Disclosures can be made directly to an Authorised Person by:
    a. Speaking with them in person, or
    b. Calling them on the number provided for your Residential Life Team, or
    c. Sending an email to them personally, or
    d. Using the online Disclosure and Support Form, which can be found on the UniLodge homepage at https://www.unilodge.com.au/. This form provides all Disclosers with an option to remain anonymous.
    e. For UniLodge Staff, via the Grievance and Complaints Procedure.

17. All Disclosures made to an Authorised Person will receive a response within 24 hours: acknowledging receipt and advising the Discloser of next steps.

18. A third party can make a Disclosure or Formal Report of Gender-based Violence where the alleged Respondent is a student Resident or Accommodation Staff member.

19. If a student Resident is not satisfied with UniLodge's response, they may ask for the matter to be reviewed by putting a request in writing to the Authorised Person. The Authorised Person will escalate all and any requests for review to the Gender-Based Violence Executive Officer, or their nominated delegate.

DISCLOSURE PROCEDURE

20. A Disclosure can be made to anyone in the UniLodge community, including to a staff member, a resident or any other person the Discloser chooses.

21. All members of the UniLodge community are supported to safely Disclose Gender-based Violence experienced by themselves or others, without fear. Every Disclosure will be received without sanction or reservation.

RECEIVING A DISCLOSURE

22. No individual is required to receive or respond to a Disclosure of Gender-based Violence, or related conduct, if they feel it is beyond their personal skill or capability, or if they are otherwise concerned in any way about their own welfare.

    22.1 Individuals are expected to recognise signs that someone may be affected by, or at risk of Gender-based Violence, and refer the concern immediately to an Authorised Person, and

    22.2 Ensure the safety and wellbeing of all people by supporting the Discloser to escalate the information appropriately.

23. On receipt of a Disclosure, the first obligation is to ensure the safety of the Discloser and or the person who has experienced Gender-based Violence, while maintaining privacy and confidentiality. Any person who receives a Disclosure should take personal responsibility for providing care by doing the following:

    a. Remain calm and provide an empathetic response. If you are in a public space, ask the Discloser if they want to move to a private space.
    b. Speak clearly, calmly and compassionately.
    c. Let them know that they are believed.
    d. Stay neutral. Avoid assumptions or judgement.
    e. DO NOT investigate. Do not try to establish a detailed account of what has occurred or make any decisions on behalf of the Discloser or person who has experienced Gender-based Violence. There is a strict obligation to minimise the need for people to repeatedly share their stories.

  f. DO NOT overstate your capacity and capability to assist.

  g. Give the Discloser space to speak in their own time. Do not press them for more detail.

IN AN EMERGENCY

24. In an emergency, or in circumstances of immediate danger, the Police and relevant emergency services must be contacted by calling triple-zero (000). Campus Security should also be notified, if the accommodation is located on a University's Campus, or if arrangements with the University facilitate Campus Security to attend at the site.

25. A threat of immediate danger can be determined by:

  a. Asking the Discloser if they are concerned about their or anyone else's' immediate safety and welfare,

  b. Checking if the Discloser or anyone else has any immediate medical concerns, are hurt or in pain,

  c. Without taking any resources away from the Discloser or person who has experienced Gender-based Violence, seek to confirm the location of the alleged Respondent, without engaging with them.

REQUIREMENT TO NOTIFY AN AUTHORISED PERSON

26. The person who receives the Disclosure, must notify an Authorised Person that a Disclosure has been made as soon as practicable. They must inform the Discloser of their obligation to notify and obtain the Discloser's consent about what information can be shared, including any preference to remain anonymous. The person who receives the Disclosure may be obliged to share personal information, in circumstances where there is an unacceptable risk of harm.

27. The Authorised Person must first ensure that all necessary immediate action is taken, proportionate to the risk arising from the Disclosure, to ensure the safety of all members of the UniLodge Community. This may include:

  a. Referral to wellbeing and counselling services delivered by their University,

  b. Referral to a local Crisis Centre who can offer immediate counselling over the phone or in person at a later time,

  c. Support attending at a GP to obtain a referral to an Accredited Specialist,

  d. Referral to the closest sexual health clinic if the individual wants to have a sexual health check (STD), and forensic health clinic if they want to have a forensic examination,

  e. Information and support engaging with Police if the person who has experienced Gender-based Violence wants to make a report, at their absolute discretion,

  f. Connecting First Nations people with an appropriate cultural liaison service,

  g. Information about their ability to make a non-anonymised Disclosure and or Formal Report, should they choose to do so at a later time,

  h. For support services relevant to educational outcomes, individuals will be referred to their university,

  i. Facilitating the relocation of the alleged Respondent to alternative accommodation, where feasible, if it is proportionate to the risk, and is in line with State tenancy laws,

  j. Other support mechanisms as appropriate.

ACCOMMODATION UNDER STANDARD 7.1

28. If a Disclosure involves a Resident, Accommodation Staff, or any Staff whose substantive role is in connection with the Student Accommodation, and the Accommodation falls under Standard 7.1 of the Code, the Authorised Person must ensure that the Resident's University is notified as soon as practicable, to ensure the Discloser and the person who has experienced Gender-based Violence receive timely wrap-around support, and to enable the University to manage the response.

29. The Authorised Person must ensure that the Discloser is informed of the obligation to notify the University and obtain the Discloser's consent about what information can be shared, including any preference to remain anonymous. The Authorised Person may be obliged to share personal information, in circumstances where there is an unacceptable risk of harm.

ACCOMMODATION UNDER STANDARDS 7.2 – 7.10
Including all Purpose-Built Student Accommodation (PBSA) and Strata Properties

30. In circumstances where a Disclosure relates to conduct that occurred in a UniLodge managed Student Accommodation, or at an event organised by UniLodge, and the Accommodation falls under Standards 7.2 to 7.10 of the Code, the Authorised Person must enable the person who has experienced Gender-based Violence, to elect that their university leads the response, including the provision of support and any investigation.

31. In circumstances where the person who has experienced Gender-based Violence elects for UniLodge to lead the response, the Authorised Person must ensure that:

    31.1 A Risk Assessment in the prescribed form is completed within 48 hours of receiving the Disclosure or immediately when required, and

    31.2 Notify the relevant University(s) that a Disclosure has been received, including the outcome of the Risk Assessment. Notification will be made:

        31.2.1 With consent of the Discloser and/or the person who has experienced Gender-based Violence, or

        31.2.2 Where the Risk Assessment makes it necessary to provide information to the University to protect the wellbeing and safety of Students and or Accommodation Staff, or

        31.2.3 De-identified, for the purpose of compliance with the Code and or any agreement between UniLodge and the University.

    31.3 Within 48 hours of a Disclosure, a Support Plan in the prescribed form is developed and implemented collaboratively with, and as desired by, the person who has experienced Gender-based Violence, and

    31.4 Within 48 hours of a Disclosure, a Support Plan in the prescribed form is developed and implemented collaboratively with, and as desired by, the alleged Respondent.

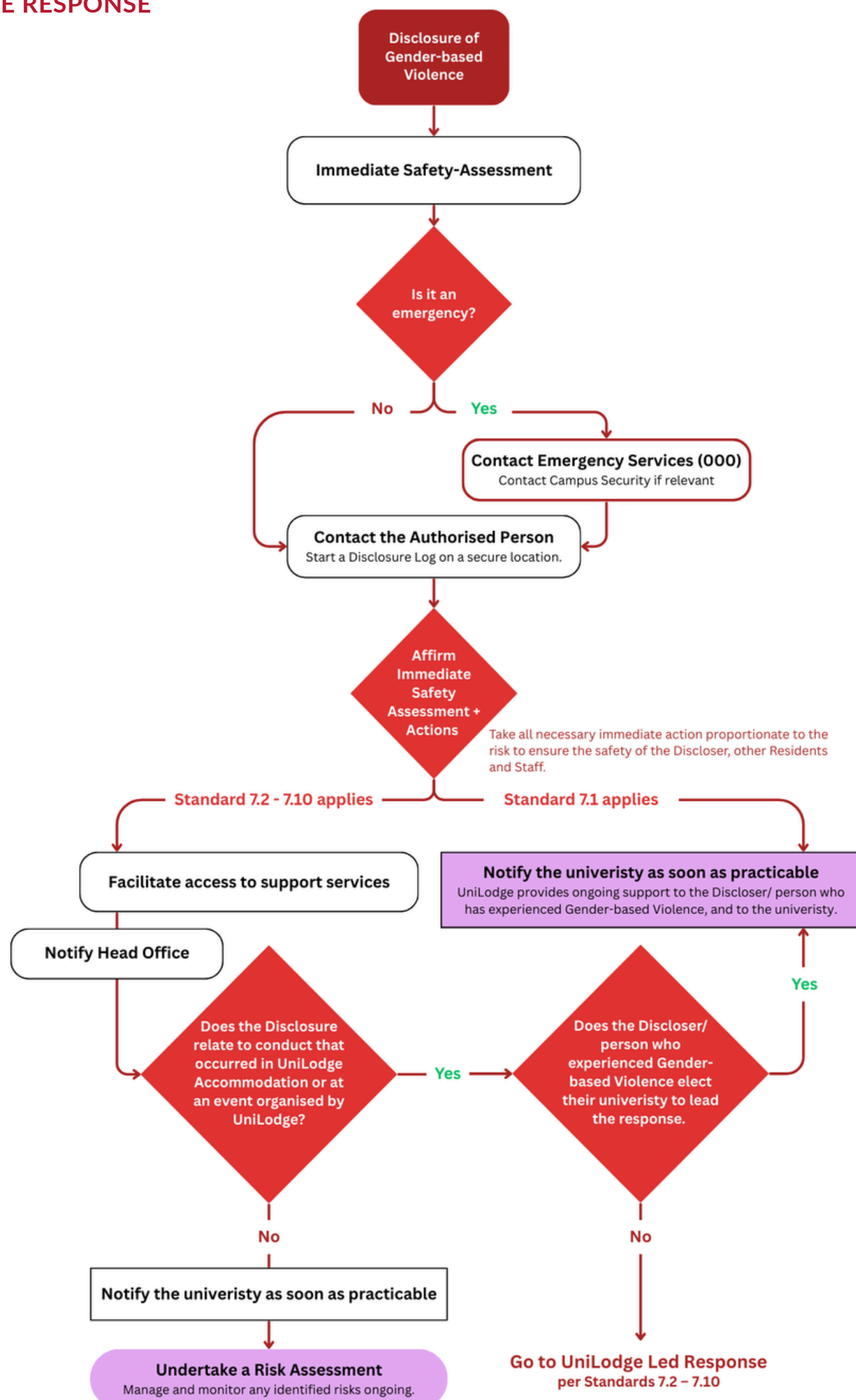## FORMAL REPORT

FORMAL REPORT PROCESS

32. Making a Formal Report of Gender-based Violence is not mandatory.

33. Where a person who experiences Gender-based Violence chooses to resolve a matter informally, UniLodge will support that person to engage in a non-punitive pathway.

34. A Formal Report is made via the online Disclosure and Support Form, which can be found on the UniLodge homepage at https://www.unilodge.com.au/. A Person making a Formal Report cannot elect to remain anonymous.

35. If the Respondent is a Resident or Accommodation Staff, the Formal Report must be investigated. An investigation under this section can only determine if an allegation is substantiated on the balance of probabilities. It is not a finding of fact.

36. If a person who has experienced Gender-based Violence determines to report the matter to Police, any and all other investigation processes will immediately stop, until the Police investigation is completed or otherwise ceases.

37. If a Formal Report involves a student resident at an Accommodation under Standard 7.1 of the Code, any investigation must be undertaken by the University.

38. If a Formal Report involves a student resident at an Accommodation under Standard 7.2 to 7.10 of the Code, the student may elect for the University at first instance, or UniLodge to lead the response.

39. If UniLodge is elected to lead the response:

    39.1 The investigation will be undertaken by a properly qualified independent third-party, and all parties will be notified in writing on the same day, and

    39.2 UniLodge will use its best endeavours to facilitate the process being finalised within 45 business days where practicable, and otherwise within a reasonable timeframe, taking account of the complexity of the matter, external processes and any other relevant matter.

40. All Parties involved in a Formal Report will be afforded procedural fairness and will be kept informed of the progress of the Formal Report, any investigation and outcome process.

41. If the Respondent is a student Resident or Accommodation Staff, UniLodge may undertake its own investigation, to ensure the ongoing safety and wellbeing of the UniLodge community, irrespective of whether a Formal Report is received.
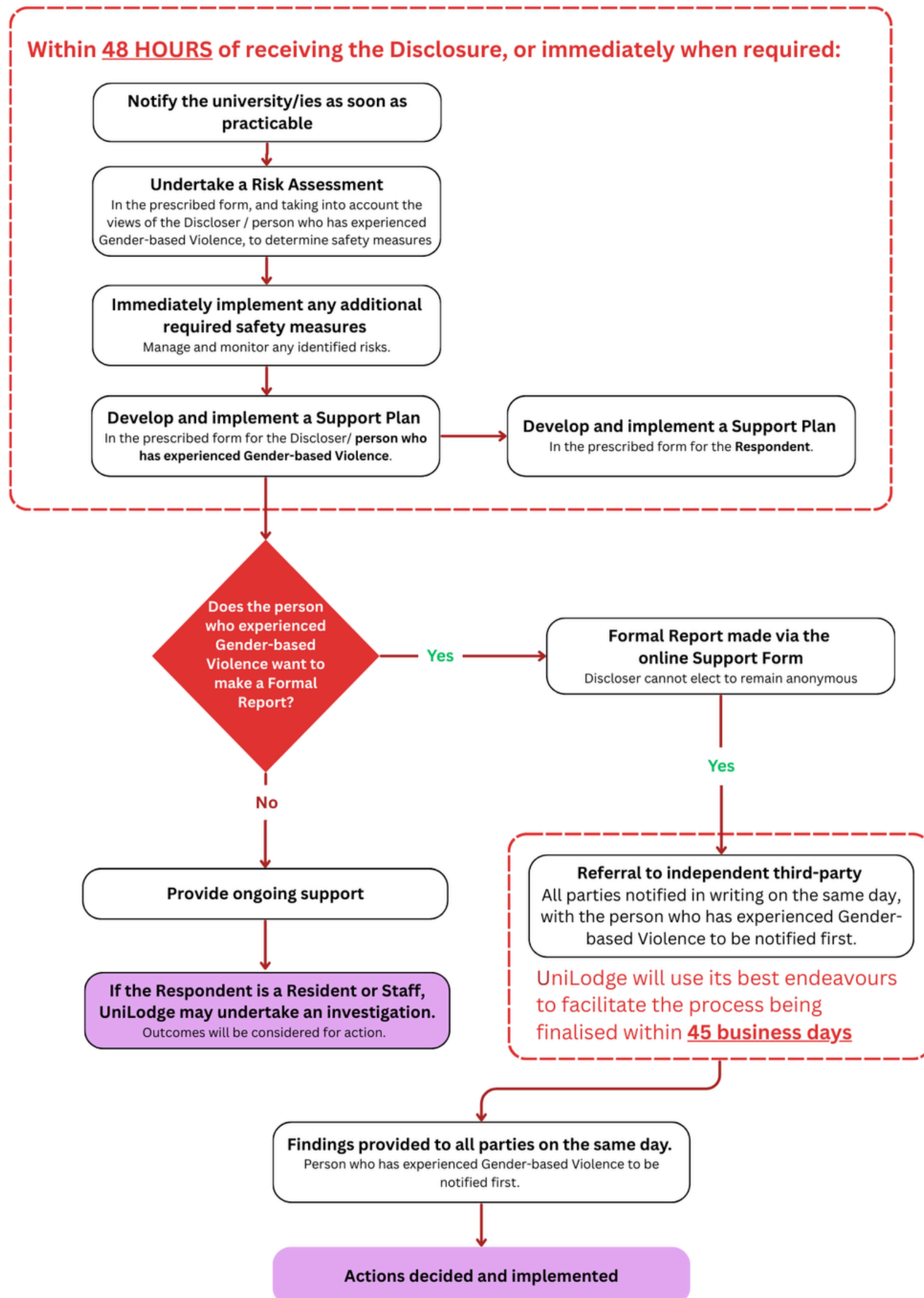
DISCLOSURE PROCEDURE
IMMEDIATE RESPONSE

DISCLOSURE PROCEDURE
UNILODGE LED RESPONSE - STANDARDS 7.2-7.10 (PBSA AND STRATA)

Within 48 HOURS of receiving the Disclosure, or immediately when required:

Notify the university/ies as soon as practicable

Undertake a Risk Assessment
In the prescribed form, and taking into account the views of the Discloser / person who has experienced Gender-based Violence, to determine safety measures

Immediately implement any additional required safety measures
Manage and monitor any identified risks.

Develop and implement a Support Plan
In the prescribed form for the Discloser/ **person who has experienced Gender-based Violence.**

Develop and implement a Support Plan
In the prescribed form for the **Respondent**.

Does the person who experienced Gender-based Violence want to make a Formal Report?

Yes → **Formal Report made via the online Support Form**
Discloser cannot elect to remain anonymous

No

Provide ongoing support

If the Respondent is a Resident or Staff, UniLodge may undertake an investigation.
Outcomes will be considered for action.

Yes

Referral to independent third-party
All parties notified in writing on the same day, with the person who has experienced Gender-based Violence to be notified first.

UniLodge will use its best endeavours to facilitate the process being finalised within **45 business days**

Findings provided to all parties on the same day.
Person who has experienced Gender-based Violence to be notified first.

Actions decided and implemented

MAKING A FALSE DISCLOSURE OR REPORT

42.   Any person who knowingly makes a false disclosure report may be subject to punitive action in accordance with UniLodge's policies and procedures.

MAKING A FALSE DISCLOSURE OR REPORT

43.   De-identified data will be reported to:

43.1   The UniLodge Executive on a regular basis for the purpose of identifying systemic risks, enable evaluation and identify opportunities for preventative action, and

43.2   Universities every-six months (or more frequently as agreed) in order to support them in discharging their duties under the Code, and

43.3   To external agencies where required under applicable legislation.

COMPLIANCE

44.   A breach or suspected breach of this procedure may result in an investigation by UniLodge.

45.   Reports of non-compliance should be made in accordance with the UniLodge Grievance and Complaints Policy and Procedure.

46.   This procedure supports UniLodge's compliance with:
   - National Higher Education Code to Prevent and Respond to Gender-based Violence 2025
   - Australian Human Rights Commission Act 1986 (Cth)
   - Sex Discrimination Act 1984 (Cth)
   - Work Health and Safety Act 2011 (Cth)
   - Fair Work Act 2009 (Cth)

RELEVANT INSTRUMENTS

47.   This procedure it to be read together with the UniLodge policies and procedures regarding behavioural standards and conduct, including but not limited to:
   - Child Protection Policy
   - Code of Conduct
   - Equal Employment Opportunity Policy
   - Grievance and Complaint Policy
   - Grievance and Complaint Procedure
   - Human Rights Policy
   - Mental Health and Wellbeing Policy
   - Sexual Harassment Policy
   - Whistleblower Policy
   - Workplace Health & Safety Policy

REVIEW

48.   This Policy will be reviewed every three (3) years (per Standard 7.4(c)(ii) of the Code), commencing 1 September 2028, including through engagement and collaboration with residents, accommodation staff, employees those who are disproportionately affected by Gender based Violence, including women, First Nations people, CALD communities, people with disability; people of diverse sexual orientation and gender identity; people who have experienced Gender based Violence; and subject matter experts (where applicable)(per Standard 7.4(c)(iii) of the Code).

REVIEW

This Plan will be reviewed every three (3) years, commencing 1 September 2028, including through engagement and collaboration with residents, accommodation staff, employees those who are disproportionately affected by Gender based Violence, including women, First Nations people, CALD communities, people with disability; people of diverse sexual orientation and gender identity; people who have experienced Gender based Violence; and subject matter experts (where applicable).

ENDORSEMENT

Declaration by UniLodge Gender-based Violence Executive Officer.

I declare that:

- I have led the preparation of the Whole-of-Organisational Gender-based Violence Prevention and Response Plan (the Plan) as required under Standard 7 of the National Code to Prevent and Respond to Gender-based Violence (2025) (the Code).

- I will lead the implementation and publication of this Plan as required under Standard 7 of the National Code.

- The information provided in the Plan is to the best of my knowledge true, complete and correct.

- The Plan and Outcomes Framework meet the requirements of the National Code.

- I have provided the Plan to the Governing Body of my organisation for its endorsement.

Full name:	Tomas Johnsson
Position title:	Chief Executive Officer
Signature:	
Date:	30.12.2025

Endorsement by Governing Body.

We declare that:

- The information provided in the Whole-of-Organisational Gender-based Violence Prevention and Response Plan is to the best of our knowledge true, complete and correct.

- The Plan and Outcomes Framework meet the requirements of the National Higher Education Code to Prevent and Respond to Gender-based Violence (2025).

- If, at any time, details contained in the plan change, or can no longer be achieved, we will notify the Department of Education.

Full name of representative:	Peter Bates
Signature of representative:	
Position title of representative:	Executive Chairman
Date of Endorsement:	30.12.2025

Key Contact:

Full name and position title:	Matt Row, Chief Operating Officer
Email and phone number(s):	matt.row@unilodge.com.au, +61 7 3233 3700

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DEFINITIONS

UniLodge adopts the following definitions for the purpose of this Plan:

Accommodation Staff means any person who is employed or engaged by a UniLodge and who's employment or engagement is in direct relation to a student Accommodation/s, including but not limited to Regional Managers, General Managers, Residential Life Managers, Residential Life Advisors/Assistants, Maintenance Staff, and equivalents, including in a non-paid capacity.

Authorised Person means a member of the UniLodge staff at Manager level or above, who has been designated to manage Disclosure and Formal Report procedures, and who has undertaken the required training to receive disclosures and undertake a Gender-based Violence Risk Assessment.

Code means the National Higher Education Code to Prevent and Respond to Gender-based Violence (2025).

Coercive Control means where there is a pattern of controlling and manipulative behaviours within any relationship, including: isolation from a support system, monitoring movements, limiting access to finances, gaslighting, severe criticism or name calling, forced sole responsibility for domestic duties, turning children against a person, controlling aspects of a person's body and health, regulating a sexual relationship, threats against loved ones and pets

Consent means a voluntary, active agreement by an unimpaired person. No one impaired by drugs, alcohol, sleep, or fear can give consent. An absence of the word 'no' does not mean there is consent, nor do non-affirming phrases. Consent can be revoked at any time.

Discloser means a person who has shared information about their experience of Gender-based Violence.

Disclosure means the provision of information about a person's experience of Gender-based Violence to UniLodge by the Discloser or any other person.

Ethical Bystander means a person who witnesses an event that is disrespectful or harmful and chooses to intervene in a way that is safe and effective.

Formal Report means the provision of a statement about an experience of Gender-based violence that triggers consideration of an investigation process, beyond the provision of support services.

Gender-based Violence means any form of physical or non-physical violence, harassment, abuse or threats, based on gender, that results in, or is likely to result in, harm, coercion, control, fear or deprivation of liberty or autonomy, and where the conduct is:

    a. Driven by unequal gender power dynamics or relationships, and/ or

    b. Connected to gendered expectations or stereotypes, and/ or

    c. Extended to Gender Identity and/or expression.

Intersectionality means the interconnected nature of social categorisations including gender, race and class, which create overlapping and interdependent systems of discrimination or disadvantage.

Person-centred means ensuring that the needs and preferences of a person who discloses an experience of Gender-based Violence are at the centre of decisions made in response to a Disclosure. The response affirms the individual's dignity and supports their healing by genuinely considering their wishes and the impact that decisions may have on them, while at all times ensuring the safety and wellbeing of the UniLodge community broadly.

Resident means a person that resides in Student Accommodation.

Trauma-informed means an approach that applies the core principles of safety (physical, psychological and emotional), trust, choice, collaboration and empowerment. It should minimise the risk of re-traumatisation and promote recovery and healing to the greatest extent possible.

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