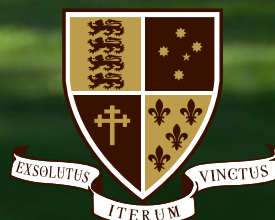


St John's College

Whole-of-Organisation Prevention and Response Plan

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



St John's College

Within The University of Queensland

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1. Introduction

St John's College is an Anglican co-residential college affiliated with the University of Queensland (UQ) and located within the University's St Lucia campus. Established in 1911, the College provides an academic and residential community for approximately 320 undergraduate students drawn primarily from UQ, with a smaller cohort from Queensland University of Technology and the Queensland Conservatorium of Music. St John's supports students from diverse rural, regional, metropolitan and interstate backgrounds through the provision of accommodation, pastoral care, academic support and co-curricular engagement opportunities.

The College is led by the Warden and supported by a professional team of live-in and day staff, including student-facing staff with responsibility for wellbeing, residential life and academic support, alongside staff overseeing operations, facilities and corporate services. Governance of St John's College is exercised by the College Council, which provides strategic oversight, ensures compliance with legislative and regulatory obligations, and guides the College's direction in accordance with its values and purpose.

This Whole-of-Organisation Prevention and Response Plan (the Plan) sets out St John's College's commitments to meeting the requirements of the *National Higher Education Code to Prevent and Respond to Gender-Based Violence* (the National Code), including Standard 7 relating to student accommodation. The Plan establishes a coordinated, whole-of-College framework to prevent gender-based violence, support those affected, and ensure effective, proportionate and accountable responses across all areas of College operations.

The Plan is informed by St John's College's Whole-of-Organisation Assessment (the Assessment), which examined enablers, systemic risks and barriers relating to the prevention of, and response to, gender-based violence within the College. The Assessment draws on student and staff consultations, five years of internal data, cultural review findings, and analysis of existing policies, systems and practices. The Assessment is provided as an accompanying document to this Plan.

This Plan is framed by Australia's national evidence base on the gendered drivers of violence against women, as articulated in *Change the Story*, which underpins the *National Plan to End Violence Against Women and Children 2022–2032*. These drivers include the condoning of violence against women, rigid gender stereotypes, unequal power and decision-making, and male peer relations that emphasise aggression and disrespect. Other forms of discrimination and inequality, including racism, homophobia and transphobia, intersect with gender inequality to compound people's experiences of violence.

National evidence, including *Change the Course* (2017) and the *National Student Safety Survey* (2021), identifies universities and residential colleges as environments with an elevated risk of sexual misconduct and gender-based violence, particularly in contexts involving alcohol misuse and discriminatory attitudes. In this context, residential colleges have a distinct responsibility and opportunity to influence community norms, strengthen prevention, and ensure accessible and effective support and reporting pathways.

The Plan, like the Assessment that underpins it, has been informed by consultation with College leadership, student-facing staff and student representatives, as well as analysis of internal data relating to disclosures, reports and responses to incidents of sexual misconduct and gender-based violence. It also draws on sector-wide findings and review of current College policies, procedures, training and preventative initiatives to identify strengths, gaps and priority areas for action.

This Plan will support St John's College's strategic decision-making, guide future planning, and ensure ongoing alignment with the National Code, sector expectations and good practice. It is structured around key focus areas aligned with the National Code, including accountable leadership and governance; safe environments and systems; knowledge and capability; safety and support; and the use of data, evidence and continuous improvement to strengthen impact over time.

2. Accountable leadership and governance

Mandatory requirements

	NATIONAL CODE STANDARD SUMMARY	KEY ACTIONS	EVIDENCE OF COMPLIANCE
7.2	A Provider must require a student accommodation provider to prepare, implement and publish on its website a Whole-of-Organisation Prevention and Response Plan.	<ul style="list-style-type: none"> • Prepare and implement a Whole-of-Organisation Prevention and Response Plan that sets out St John's College's approach to preventing and responding to gender-based violence within the residential environment. • Ensure the Plan is informed by a Whole-of-Organisation Assessment identifying systemic enablers, risks and barriers across leadership, culture, systems, service delivery and governance. • Establish a Gender-Based Violence Advisory Group comprising staff and student representatives to support implementation and ongoing refinement of the Plan. • Submit the Plan to College Council for endorsement. • Publish the Plan and the Whole-of-Organisation Assessment on the College website prior to 1 January 2026. • Establish quarterly reporting by management to College Council on implementation progress, emerging risks and response effectiveness. 	<ul style="list-style-type: none"> • St John's College Whole-of-Organisation Prevention and Response Plan (2026). • Whole-of-Organisation Assessment (2025). • College Council agenda papers and minutes confirming endorsement of the Plan (February 2026). • Publicly accessible webpage hosting the Plan and Assessment. • Records of consultation undertaken as part of the Assessment, including Leadership Week 2025 consultations with the Student Club Executive, Residential Advisors and Orientation Week leaders. • Evidence of RespectX availability to all residents and staff.
7.3	A Provider must require a student accommodation provider to monitor and measure the impact of the Prevention and Response Plan on an ongoing basis and update the Prevention and Response Plan at least every four years.	<ul style="list-style-type: none"> • Establish an evaluation framework by Q2 2026 to assess the effectiveness of prevention, training and response initiatives. • Monitor impact through a combination of qualitative and quantitative measures, including RespectX data, reporting trends, training participation and staff and student feedback. • Embed review of gender-based violence risks, prevention initiatives and response effectiveness into existing governance, pastoral care and risk processes. • Commit to an annual review of the Plan for effectiveness, with a formal review and update at least every four years, or earlier if triggered by significant incidents or regulatory change. • Monitor and evaluate implementation through the Finance and Risk Committee, with reporting to College Council. 	<ul style="list-style-type: none"> • Standing agenda items and reporting to College Council and Finance and Risk Committee on student wellbeing, safety and GBV-related risks. • Meeting agendas and minutes from College Council, Finance and Risk Committee and relevant pastoral care meetings. • Aggregated and de-identified RespectX disclosures and reporting data.

Additional actions from Whole-of-Organisation assessment

- Targeted training for returning students on RespectX and reporting pathways.
- Annual refresher training on gender-based violence prevention and responding to disclosures.
- Additional capability-building for student leaders, including Residential Advisors and Student Club Executive members.
- Ongoing staff training on responding to disclosures using a person-centred, trauma-informed and safety-focused approach.
- Increased promotion and education of reporting and support pathways throughout the year.
- Review and risk-rating of student events to reduce alcohol-related harm.
- Engagement of subject-matter experts to reinforce prevention, leadership and cultural change.
- Clear articulation of staff accountability and escalation pathways, ensuring multiple trusted disclosure options are available to residents.

3. Safe environments and systems

	NATIONAL CODE STANDARD SUMMARY	KEY ACTIONS	EVIDENCE OF COMPLIANCE
7.4a	<p>A Provider must require a student accommodation provider to:</p> <ul style="list-style-type: none"> require its staff to declare any previous investigations or substantiated allegations of gender-based violence in similar roles consider any declaration and associated risks in employment/engagement decision making consider any substantiated allegations found during a person's employment with the college in promotion/recognition processes require staff to declare any existing or previous intimate personal relationship with a resident and manage and monitor any associated risks. 	<ul style="list-style-type: none"> Require all staff and relevant student leaders (including Residential Advisors) to declare any previous investigations or substantiated findings of gender-based violence in similar roles prior to commencement on a standard proforma document. Require staff and relevant student leaders to declare where there may be a conflict of interest pertaining to a current or prior intimate personal relationship with a resident. Assess declarations and associated risks and implement appropriate risk management arrangements where required. Consider substantiated findings of gender-based violence in employment, engagement, promotion and recognition decisions, consistent with duty of care obligations. Review and amend where necessary, the Staff Code of Conduct to state clearly and unambiguously that gender-based violence is unacceptable. Provide staff training to reinforce positive obligations to declare relationships, manage conflicts of interest and comply with risk management processes 	<ul style="list-style-type: none"> Recruitment, engagement and screening documentation, including mandatory declaration requirements. Completed declaration forms for staff and relevant student leaders. Risk management and conflict of interest plans where risks are identified. Staff Code of Conduct. Training materials and attendance records.
7.4b	<p>A Provider must require a student accommodation provider to:</p> <ul style="list-style-type: none"> prohibit the use of a Non disclosure Agreement, unless requested by the Discloser if requested, ensure it does not stop the Discloser from sharing information as part of seeking support ensure any settlement agreements do not contain a non disparagement clause. 	<ul style="list-style-type: none"> Prohibit the use of non-disclosure agreements in relation to gender-based violence, unless explicitly requested by the discloser. Where requested, ensure any agreement does not prevent the discloser from seeking support or the College from meeting reporting obligations. Prohibit the use of non-disparagement clauses in any settlement agreements relating to gender-based violence. 	<ul style="list-style-type: none"> Gender-Based Violence and Sexual Misconduct Policy explicitly addressing the use of NDAs and non-disparagement clauses. Template settlement and agreement documentation.

	NATIONAL CODE STANDARD SUMMARY	KEY ACTIONS	EVIDENCE OF COMPLIANCE
7.4c	<p>A Provider must require a student accommodation provider to:</p> <ul style="list-style-type: none"> adopt the Provider's policies and procedures on preventing and responding to Gender-Based Violence OR have and implement their own that meet National Code requirements develop and review the policy at least every three years in consultation with relevant stakeholders. 	<ul style="list-style-type: none"> Maintain and implement St John's College policies relating to the prevention of and response to gender-based violence that meet or exceed National Code requirements and align with UQ frameworks where appropriate. Ensure policies are trauma-informed, person-centred, publicly accessible and clearly communicated to students and staff. Review policies at least every three years through consultation with students, staff and relevant stakeholders, including those with lived experience and subject-matter expertise. Submit policies to College Council for approval at the February 2026 Council meeting. 	<ul style="list-style-type: none"> St John's College Gender-Based Violence Prevention and Response and Sexual Misconduct Policy. Council agenda papers and minutes confirming policy approval (February 2026). Records of stakeholder consultation and expert review. Publicly accessible policy webpages

Additional actions arising from the Whole-of-Organisation Assessment

<ul style="list-style-type: none"> Ensure student-led events incorporate gender-based violence considerations into risk assessment and event approval processes. Continue to actively manage alcohol-related risks within the residential environment. 	<ul style="list-style-type: none"> Review physical and systems-based safety controls (including access control, CCTV coverage and data retention limits) to ensure risks are mitigated while respecting privacy. Increase communication to the college community prior to major social events.
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4. Knowledge and capability

Mandatory requirements

	NATIONAL CODE STANDARD SUMMARY	KEY ACTIONS	EVIDENCE OF COMPLIANCE
7.5	<p>A Provider must require a student accommodation provider to:</p> <ul style="list-style-type: none"> require residents and staff to complete prevention education and training and responding to disclosures training that: <ul style="list-style-type: none"> » meets requirements of Standard 3 » is tailored to the student accommodation environment » is delivered or approved by the provider promote evidence based prevention messaging tailored to the student accommodation environment evaluate any initiatives and use findings to inform future activities. 	<ul style="list-style-type: none"> Require all staff and student leaders to complete mandatory training in responding to disclosures using trauma-informed, person-centred and safety-focused approaches, consistent with Standard 3. Require all residents to complete approved prevention education prior to or at commencement of residence, with additional context-specific education delivered within the College environment. Deliver role-appropriate education for student leaders and staff recognising their responsibilities within the residential context. Promote evidence-based prevention messaging tailored to the residential college environment throughout the academic year. Evaluate education and training initiatives and use findings to inform continuous improvement. 	<ul style="list-style-type: none"> Published overview of St John's education and training framework. Training schedules and delivery plans for residents, returning residents, student leaders and staff. Training attendance records and central training register. Records of participation in UQ-approved training modules and College-delivered programs. Evaluation tools, summaries and documented improvements arising from feedback.
7.6	<p>A Provider must require a student accommodation provider to ensure risk assessments are only undertaken by people with expertise prescribed in Standard 3, and when internal capability is not sufficient, engage a person with the requisite expertise.</p>	<ul style="list-style-type: none"> Ensure that risk assessments following disclosures and formal reports are undertaken only by staff with appropriate training and experience in gender-based violence risk assessment. Maintain a register of staff authorised to conduct risk assessments. Engage external subject-matter experts where required to support complex risk assessments, training and case advice. Provide ongoing professional development, supervision and support for staff undertaking risk assessment functions. 	<ul style="list-style-type: none"> Risk assessment procedures and escalation pathways. Training records demonstrating staff capability. Register of authorised risk assessors. Service agreements or engagement records with external specialist providers (e.g. Code Black Psychology). Supervision and professional development records.

Additional actions from Whole-of-Organisation assessment

- Strengthen confidence among students and staff to identify, challenge and report problematic behaviours.
- Deliver targeted training for returning students on RespectX and reporting pathways.
- Enhance capability-building for student leaders, recognising their frontline role while reinforcing staff accountability.
- Integrate policy content into education and training to strengthen understanding of behavioural expectations and support pathways.
- Prioritise visibility and comprehension of key policies, not only access.
- Expand promotion of RespectX and other reporting and support mechanisms throughout the academic year.

5. Safety and support

Mandatory requirements

	NATIONAL CODE STANDARD SUMMARY	KEY ACTIONS	EVIDENCE OF COMPLIANCE
7.7a-c	<p>A provider must require a student accommodation provider to:</p> <ul style="list-style-type: none"> ensure its responses, practices and support services are safe, person centred and trauma informed provide or facilitate access to support services to disclosers and respondents promote and disseminate information on how residents and staff can access policies, procedures and support services. 	<ul style="list-style-type: none"> Ensure all responses, practices and support services are safe, person-centred and trauma-informed, and articulated clearly within College policies and procedures. Ensure staff are appropriately trained to respond to disclosures and formal reports using trauma-informed and person-centred approaches. Provide and facilitate access to appropriate support services for both disclosers and respondents, including counselling, pastoral care, medical and University-based services. Actively promote and disseminate information on policies, procedures, reporting pathways and support services throughout the academic year using multiple communication channels. 	<ul style="list-style-type: none"> Published Gender-Based Violence and Sexual Misconduct policy. Training materials and attendance records for staff and student leaders. Training register for staff and students. Student handbook and materials and face-to-face briefings outlining support and reporting pathways. Pastoral care protocols and referral pathways.
7.7d	<p>A provider must require a student accommodation provider to undertake a risk assessment following every disclosure and formal report.</p>	<ul style="list-style-type: none"> Undertake a risk assessment following any disclosure or formal report of gender-based violence using the College's approved risk assessment framework, including RespectX. Ensure risk assessments are conducted by appropriately trained staff and reviewed as required. Manage and monitor identified risks on an ongoing basis, adjusting safety measures where necessary. 	<ul style="list-style-type: none"> Risk assessment framework. De-identified risk assessment and case management records (including RespectX). Training records demonstrating staff capability to undertake risk assessments
7.7e (i)	<ul style="list-style-type: none"> Where a disclosure relates to behaviour occurring in residence or at an event organised by the residence, a provider must require a student accommodation provider to take all necessary action to manage risk, including relocation of the respondent where required and facilitating urgent access to support services. 	<ul style="list-style-type: none"> Implement proportionate safety measures following risk assessment, which may include temporary or permanent relocation of respondents where necessary to protect safety. Facilitate timely access to internal and external support services for disclosers and respondents. Maintain emergency accommodation and support pathways where urgent action is required. 	<ul style="list-style-type: none"> Gender-Based Violence and Sexual Misconduct Policy addressing risk management and relocation. Disclosure and response flowcharts. Records of safety measures and accommodation arrangements (de-identified). Referral pathways to counselling, medical and crisis support services.

	NATIONAL CODE STANDARD SUMMARY	KEY ACTIONS	EVIDENCE OF COMPLIANCE
7.7e (ii)	A provider must have arrangements in place with a student accommodation provider to enable a discloser to choose the provider to lead the response to a disclosure, and the student accommodation provider must cooperate fully and implement any outcomes decided by the provider.	<ul style="list-style-type: none"> • Ensure the College’s policies clearly articulate the discloser’s right to choose whether the University or the College leads the response. • Maintain arrangements with UQ enabling University-led responses where elected by the discloser. 	<ul style="list-style-type: none"> • Gender-Based Violence and Sexual Misconduct Policy. • Arrangements and protocols with UQ. • Training materials and communication records explaining reporting options.
7.7e (iii)	<p>A provider must have arrangements in place with a student accommodation provider to enable a discloser to choose the student accommodation provider to lead the response to the disclosure, and the student accommodation provider must:</p> <ul style="list-style-type: none"> • undertake a risk assessment within 48 hours and from this determine necessary safety measures (including relocation of the respondent) and immediately implement them • manage and monitor risk • share necessary information with the provider to protect safety of others • implement support plans for both disclosers and respondents that meet requirements of Standard 4 within 48 hours. 	<ul style="list-style-type: none"> • Where a discloser elects for the College to lead the response, undertake a risk assessment as soon as practicable and within 48 hours. • Implement necessary safety measures promptly following risk assessment. • Develop and implement support plans for disclosers and respondents within 48 hours, consistent with trauma-informed practice. • Manage and monitor risk on an ongoing basis and share necessary information with the University to protect the safety of others. 	<ul style="list-style-type: none"> • Documented procedures specifying response timeframes. • De-identified risk assessments and support plans. • Information-sharing protocols with UQ. • Evidence of after-hours on-call arrangements enabling timely responses.

Additional actions arising from the Whole-of-Organisation Assessment

<ul style="list-style-type: none"> • Ensure residents have multiple, visible and trusted pathways for disclosure and support. • Maintain a strong, multi-layered pastoral care model with clear escalation pathways. • Continue strengthening resident confidence in reporting pathways by clearly explaining response processes and likely outcomes. 	<ul style="list-style-type: none"> • Ensure student leaders are supported and not expected to manage disclosures independently. • Formalise internal escalation processes, timeframes and documentation to ensure consistent alignment with the National Code. • Address barriers to reporting, including fear of punitive outcomes or social consequences.
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6. Data, evidence and impact

Mandatory requirements

	NATIONAL CODE STANDARD SUMMARY	KEY ACTIONS	EVIDENCE OF COMPLIANCE
7.8	A provider must require a student accommodation provider to collect and report data prescribed by Standard 6, where applicable.	<ul style="list-style-type: none"> Collect, record and maintain data relating to disclosures, reports, response actions and outcomes in accordance with Standard 6, using RespectX as the College's primary reporting and case management system. Ensure data collection, storage and reporting comply with privacy, confidentiality and information-sharing obligations. Use aggregated and de-identified data to monitor trends, identify systemic risks and inform prevention, response and continuous improvement activities. Report relevant data and trend analysis to College Council and the Finance and Risk Committee as part of regular governance oversight. Share de-identified data with UQ where required, in accordance with agreed protocols and National Code obligations. 	<ul style="list-style-type: none"> RespectX reporting and case management system in active use. De-identified internal case management and trend reports. Aggregated reporting to College Council and Finance and Risk Committee. Information-sharing protocols and arrangements with UQ. Data-sharing provisions within the Residential Agreement.

Additional actions arising from the Whole-of-Organisation Assessment

- Use data alongside qualitative feedback from students and staff to avoid reliance on single indicators.
- De-identified data is used to inform prevention, resource allocation, oversight and continuous improvement
- Regularly review trends to identify emerging risks associated with cohort change and seasonal pressures.
- Integrate data insights into governance reporting, education and training design, event risk management and prevention initiatives.
- Use data to inform resource allocation and prioritisation of prevention and response activity.
- Review data quality and reporting processes periodically to strengthen consistency and reliability.