

Staff Gender-based Violence and Sexual Harm Response

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1.0 Purpose

Griffith University is committed to providing a safe, respectful, and inclusive environment for all members of the University community.

This procedure guides and informs the way in which the University will support and respond to any Employee, Leader or Worker matter involving Gender-based Violence or Sexual Harm.

The University recognises it has the following responsibilities:

- a. In accordance with the Sex Discrimination Act 1984 (*Cth*), the University has a positive duty to take reasonable and proportionate measures to eliminate, as far as possible, the following conduct in connection with work:
 - Sexual Harassment
 - Victimisation
 - Sex Discrimination
 - Sex-based Harassment
 - Conduct Creating a Workplace Environment that is Hostile on the Ground of Sex.
- b. Consistent with the Work Health and Safety Regulation 2011 (Qld), manage the risk of Sexual Harassment and gender-based harassment.
- c. Consistent with the National Higher Education Code to Prevent and Respond to Gender-based Violence (2025):
 - Adhere to all standards and requirements in connection with preventing and responding to Gender-based Violence.
 - Report on how it has complied with its obligations, in a manner and form to be prescribed by the Department of Education, including providing de-identified data on incidents of Gender-based Violence and de-identified demographic data and enrolment/engagement characteristics of disclosers and respondents.

2.0 Scope

This procedure applies to incidents of Gender-based Violence and Sexual Harm experienced by or engaged in by a Griffith University Employee, Leader or Worker, regardless of where or the context in which they occur, including on-campus, in-person, off-campus or through digital technology.

This procedure does not apply to:

- Gender-based Violence and Sexual Harm matters relating to children, which are managed through the Child Safety and Wellbeing Policy.
- Students who are alleged to have engaged in Gender-based Violence and Sexual Harm, which are managed under the Student Conduct, Safety and Wellbeing Policy.

3.0 Procedure

This procedure is in accordance with the University's Gender-based-Violence and Sexual Harm Prevention and Response Policy.

3.1 Support options

The University supports individuals who have been affected by Gender-based Violence or Sexual Harm to choose whichever course of action is best for them at the time, and whether they feel safe and confident to make a Disclosure or Formal Report.

Employees, Leaders and Workers who have experienced Sexual Harm may choose not to identify themselves or the other person/s involved. The University supports the right to decide what information the individual feels safe to disclose after Gender-based Violence or Sexual Harm has occurred, including whether to make a Disclosure anonymously.

3.1.1 Immediate danger or emergency response

If a member of the University community is in immediate danger, or in an emergency situation, immediately contact:

- emergency services (24 hours) call 000 or 112 from a mobile phone
- Campus Support Team (security) (24 hours on campus) call 1800 800 707.

3.1.2 Counselling and wellbeing support

The University provides confidential counselling and wellbeing support services for Employees and Leaders who wish to disclose via the confidential workplace wellbeing and counselling services:

- Converge International (24 hours, 7 days) call **1300 687 327**.

Employees, Leaders and Workers can access specialist support and advice from a range of services, including:

- DV Connect Sexual Assault Helpline (7.30am – 11.30pm, 7 days) call 1800 010 120
- 1800 RESPECT National Helpline for Sexual Assault, Domestic or Family Violence (24 hours, 7 days) call 1800 737 732
- Rainbow Sexual, Domestic and Family Violence Helpline (24 hours, 7 days) call 1800 497 212
- 13YARN national crisis support line for mob to connect with an Aboriginal or Torres Strait Islander Crisis Supporter (24 hours, 7 days) call 13 92 76.

3.1.3 Respect Officers

Respect Officers can assist Employees and Leaders when Gender-based Violence or Sexual Harm has occurred by providing information about University policy and processes, support services and reporting options.

3.2 Disclosure and reporting

Employees, Leaders and Workers have an obligation to behave professionally and with respect for others, contributing to the prevention of Gender-based Violence and Sexual Harm and providing appropriate and adequate support and empathy when incidents do occur.

An Employee, Leader or Worker who has been impacted by Gender-based Violence or Sexual Harm may choose not to identify themselves or the other person/s involved. The University supports the rights of individuals to decide what information they disclose following instances of Gender-based Violence and Sexual Harm, including whether to make a Disclosure or report anonymously. The University's ability to respond to a Disclosure or report may be impacted if the information provided is incomplete.

There is a range of reporting and Disclosure options available to Employees, Leaders and Workers who have been affected by Gender-based Violence or Sexual Harm:

3.2.1 Self-guided resolution

Self-guided resolution may be an appropriate option for individuals who have experienced lower-risk forms of Gender-based Violence, including behaviours such as sexist jokes, inappropriate comments, or other forms of sexual harassment that do not involve threats, coercion, or imminent risk.

No Employee, Leader or Worker is ever required to address harmful behaviour directly. However, the University recognises that some people may prefer to resolve the matter themselves in a way that supports their sense of agency, safety, and control.

Bystander intervention may also be appropriate for Employees, Leaders or Workers who have witnessed Gender-based Violence—such as sexist jokes, inappropriate comments, or boundary-crossing behaviour. Ethical bystander intervention encourages individuals to take safe, considerate, and proportionate action when they witness inappropriate behaviour.

3.2.2 Disclosures

A Disclosure is informing the University about an experience of Gender-based Violence or Sexual Harm, even if it did not involve another member of the University community or occur in a University setting. A Disclosure is made to seek support or acknowledge the potential impact of the experience on an individual's wellbeing, safety, or ability to participate fully in work or study, without requesting the University to take any formal action or resolution. Disclosures can be:

- Verbal: An individual may choose to provide a verbal account of the incident to a colleague or Respect Officer to gain information about the support and Formal Reporting options.
- In writing: Using the **Report a Concern** form, an individual can choose to make a Disclosure of an incident.

The individual can disclose their identity or remain anonymous.

Individuals receiving a Disclosure are required to inform the University of the Disclosure via **Report a Concern** when the discloser does not do so themselves. If the discloser has not provided consent, the anonymous form option must be used.

3.2.3 Formal Reports

If an individual wishes the University to investigate or take action, they can submit a Formal Report via **Report a Concern**. In lodging a Formal Report, individuals are asked to provide as much information as possible about the incident.

In accordance with the Griffith University Privacy Statement, a colleague or other responder may lodge a Formal Report on behalf of another individual, provided that person is aware of and has consented to the Formal Report. The discloser can choose to disclose their identity or remain anonymous.

An Employee can also lodge a Formal Report about the conduct of another Employee verbally or in writing directly with their Manager, Head of Element or Human Resources.

3.2.4 After a Disclosure or Formal Report is made

The University's response to a Disclosure or Formal Report will be prompt, person-centred and trauma-informed and, to the extent possible, will be guided by the wishes of the individual. In this regard, the University may facilitate incident-related support, reasonable adjustments and/or implement interim measures to ensure the safety and wellbeing of impacted parties.

A risk assessment will be conducted for all Disclosures and Formal Reports, with identified risks managed and monitored in partnership with the impacted parties.

An individual who has made a Disclosure or Formal Report may involve a support person of their choice throughout the process and may withdraw from participating in the process at any time.

3.2.5 University response to Disclosures

When a Disclosure is made via **Report a Concern**, the University will provide general information to the discloser on:

- Services and mechanisms which may aid in supporting the safety, security, health and wellbeing of affected individuals.
- Options for lodging a Formal Report, or a report external to the University.

Where necessary for the safety and wellbeing of impacted individuals, the University may investigate a Disclosure. The discloser will be notified if the University intends to investigate a Disclosure and will seek and consider their views before progressing a Disclosure to an investigation or disciplinary process.

3.2.6 University response to Formal Reports

All Formal Reports will be handled in a procedurally fair manner. The health and wellbeing of all parties will be supported in line with the University's duty of care.

The University will take all reasonable steps to ensure that the investigation and resolution process is trauma-informed.

3.2.7 Anonymous Disclosures and Formal Reports

It is recognised that in some instances, individuals may choose to disclose or report an incident anonymously. While the University treats all Disclosures and Formal Reports seriously, it may be unable to investigate a behaviour or incident either properly or fully, provide a decision or take action to resolve the issue when the source of the Disclosure or Formal Report is unknown or insufficient particulars are provided.

An Anonymous Disclosure is appropriate if the individual does not wish the University to respond to the Disclosure but would like a record made of the incident to identify underlying issues, risks or trends and where they recognise that the University may not be able to take formal action.

3.2.8 Limits to confidentiality

In accordance with the University Privacy Statement, the University may use or disclose personal information where required by law or where it is necessary for certain types of law enforcement, or where it is necessary to protect against a serious and imminent threat to a person's life or health.

3.3 Support for disclosers and respondents

The Director, HR (or nominee) may decide if any interim measures are to be put into effect to prevent any further escalation of matters and to support the wellbeing of impacted Employees and

Leaders. Such interim measures may include a temporary change in a reporting line, an alternative work location or work pattern.

3.3.1 Safety and support for disclosers

When implementing safety measures in response to a Disclosure or Formal Report, the University will engage with and seriously consider the views of the discloser.

The University will assign a Support Officer to work collaboratively with the discloser to develop a support plan, including consideration of any necessary safety measures or adjustments.

3.3.2 Support for respondents

The University will assign a Support Officer to develop, in consultation with the respondent, a support plan, including consideration of any necessary safety measures for the discloser, which may adversely impact the respondent.

The Support Officer assigned to the respondent will be separate from the Support Officer assigned to the discloser.

3.4 Resolution of Formal Reports

The safety and wellbeing of all members of the University community is the highest priority. The University will support individuals to manage their response on their own terms and when they feel safe and confident to do so.

The University can accept a Formal Report at any time following an incident, regardless of whether or not it has been reported to the Police, and may take action to resolve the Formal Report while the alleged perpetrator remains an Employee, Leader, Worker or student of the University.

On receipt of a Formal Report of Gender-based Violence or Sexual Harm, appropriate measures may be put in place to support the health and wellbeing of all affected parties. Measures may also support continuity of the work or learning environment during the process of any investigation.

3.4.1 Investigation

Where the Director, HR (or nominee) determines that the reported behaviour or actions may constitute Gender-based Violence or Sexual Harm, they will be dealt with in accordance with the misconduct/serious misconduct procedures provided in the relevant Enterprise Agreement.

The University will notify the discloser and the respondent in writing when an investigation will be commenced. The notification will be made to the discloser and respondent on the same day, and the discloser will be notified first.

All parties (including the discloser and the respondent) will have an opportunity to be accompanied by a support person or representative when they are asked about the matters that are the subject of the Disclosure or Formal Report.

The discloser and respondent will not be required to provide physical evidence relating to an alleged incident of Gender-based Violence or Sexual Harm.

The Director HR may proceed with formal action in accordance with the misconduct/serious misconduct provisions within the University's relevant Enterprise Agreement at any time. Worker conduct will be managed under the relevant terms of engagement.

Where any process results in recommendations for broader or systemic changes at the University, the Provost and/or Director, HR will determine the appropriate actions to implement any recommendations.

3.5 External agencies

An individual may choose to report an incident to the police at any time, requesting the police to investigate the matter. The lodgement of a complaint with the Queensland Police Service (QPS) may prompt a police investigation.

Where QPS notifies the University of an active police investigation, any University process may be placed on hold.

The University may choose to put in place measures to remove an Employee from the place of work during a police investigation.

Alternatively, a discloser may choose to report the matter anonymously to QPS using alternative reporting options.

3.7 Victimisation

An individual must not be victimised as a result of making or being involved in a Disclosure or Formal Report process. Any individual who considers they have been subject to any form of victimisation should contact:

- Supervisor or Head of Element (where appropriate)
- HR Business Partnering team
- **Report a Concern**

3.8 Vexatious and Malicious Reports

The University may decline to take action in respect of a Disclosure or Formal Report that is assessed or determined as frivolous, Vexatious or Malicious. Reports that meet these definitions may result in disciplinary action against the employee or student who raised the matter.

3.9 Confidentiality, privacy and recordkeeping

The University will retain records of Disclosures and Formal Reports made online via **Report a Concern** in accordance with the University's Information Management Policy. This can include details provided by the individual who made the report, information gathered to understand the grounds on which the outcome was determined, and the actions taken to address the concern.

The University respects privacy and confidentiality. The expectation of confidentiality extends to all correspondence, reports, findings, and responses related to any investigation. However, the University may be required to share information to protect the safety of individuals or the community, meet legal or regulatory requirements, or to ensure procedural fairness.

De-identified data related to incidents of Gender-based Violence and Sexual Harm must be reported to the Department of Education annually and University Leadership biannually. De-identified data will be made publicly available and used to inform and improve the University's management and response processes.

The University has a mandatory obligation to report allegations of sexual offending against a child aged under 16 years or 18 years where there is an impairment of the mind. Such allegations must be reported to relevant agencies, which may include Queensland Police and the Queensland Family and Child Commission.

The University also has obligations to report under DFAT's Preventing Sexual Exploitation, Abuse and Harassment (PSEAH) Policy, specifically for any project, work or activity that involves DFAT partnering, funding or association.

4.0 Definitions

Disclosure means an individual letting the University know about their experience or witnessing of Sexual Harm, but not a request for the University to take formal action.

Discrimination occurs when a person is treated unfairly or disadvantaged because of a protected attribute under applicable Commonwealth or Queensland antidiscrimination legislation.

Discrimination may be direct or indirect. Direct discrimination occurs when a person is treated less favourably because of a protected attribute they have, have had, are assumed to have, or because of their association with a person who has that attribute. Indirect discrimination occurs when an unreasonable requirement, condition or practice that applies to everyone has the effect of disadvantaging a particular person or group of people because of a protected attribute. Protected attributes are defined in Queensland and Commonwealth legislation, and include attributes such as:

- Sex, sex characteristics, gender identity, intersex status, sexuality
- Relationship status, pregnancy, parental status, breastfeeding, family responsibilities
- Age
- Race, colour, national extraction, nationality, social origin
- Impairment, medical record
- Religious belief or religious activity
- Political belief or activity
- Trade union activity
- Sex work activity
- Experiencing family or domestic violence
- Association with, or relation to, a person identified on the basis of any of the above attributes.

Employee means individuals employed by the University and whose conditions of employment are covered by a University Enterprise Agreement or relevant Award, including continuing, continuing contingent-funded, fixed term and casual staff, and senior employees whose conditions of employment are covered by a written agreement or contract with the University.

Formal Report means an individual making a complaint to the University about an incident or behaviour concerning Sexual Harm. A Formal Report will result in the University undertaking an investigation into the concern.

Gender-based Violence is any form of physical or non-physical violence, harassment, abuse or threats, based on gender, which results in, or is likely to result in, harm, coercion, control, fear or deprivation of liberty or autonomy.

Leadership/Leaders, for the purpose of this procedure, comprises the Vice Chancellor, the Executive Group and the University Council.

Report a Concern is an online form for students and employees to make either an informal Disclosure or formal Report about an incident of behaviour concerning Sexual Harm. Disclosures and formal Reports may be made anonymously.

Sexual Harm is any unwanted behaviour of a sexual nature. Sexual Harm includes sexual assault, rape, Sexual Harassment, sex-based harassment, and any other unwanted sexual behaviour, whether online or in person. The behaviour may result in a person feeling uncomfortable, frightened, distressed,

intimidated, or harmed either physically or psychologically. All behaviours that cause Sexual Harm are Gender-based Violence.

Support Officer is a trained employee with relevant expertise and experience, usually from within Student Safety and Wellbeing, Human Resources, and/or Health, Safety and Wellbeing.

Vexatious or Malicious Report means a complaint where the person:

- knows it to be false and
- complains about the primary purpose of damaging the University or the person(s) against whom the Report is made.

Worker, for the purpose of this procedure, has the same extended meaning as ‘worker’ under the Model Work Health and Safety Act, which includes Employees, contractors or subcontractors and their employees, employees of labour hire companies assigned to work in the University, outworkers, apprentices and trainees, work experience students and volunteers.

5.0 Information

Title	Staff Gender-based Violence and Sexual Harm Response Procedure
Document number	2026/0001046
Purpose	This procedure guides and informs the way in which the University will support and respond to any Employee, Leader or Worker matter involving Gender-based Violence or Sexual Harm.
Audience	Staff
Category	Operational
Subcategory	Staff
UN Sustainable Development Goals (SDGs)	This document aligns with Sustainable Development Goal: 3: Good health and wellbeing
Approval date	13 May 2026
Effective date	13 May 2026
Review date	2029
Policy advisor	Head, HR Business Partnering
Approving authority	Director, Human Resources

6.0 Related policy documents and supporting documents

Legislation	<p>Anti-Discrimination Act 1991 (Qld)</p> <p>Fair Work Act 2009 (Cth)</p> <p>Sex Discrimination Act 1984 (Cth)</p>
Policy	<p>Code of Conduct</p> <p>Equity, Diversity and Inclusion Policy</p> <p>Gender-based Violence and Sexual Harm Prevention and Response Policy</p> <p>Health, Safety and Wellbeing Policy</p> <p>Employee Harassment, Bullying and Discrimination Policy</p>
Procedures	<p>Individual Grievance Resolution Procedure</p> <p>Employee Harassment, Bullying and Discrimination Procedure</p> <p>Student Reports of Bullying, Harassment, Discrimination and Sexual Harm Procedure</p>
Local Protocol	<p>Academic and Professional and Support Staff Enterprise Agreements</p> <p>Griffith University Privacy Statement</p> <p>Safe Campuses website</p>
Forms	<p>Report a Concern</p> <p>Report a Concern (anonymous)</p>