

Student Reports of Bullying, Harassment, Discrimination and Sexual Harm

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1.0 Purpose

Griffith University is committed to providing a safe, respectful and inclusive environment for all students, Employees, and other individuals who are part of the University Community.

This procedure details the processes for a student to Disclose and make Formal Reports about incidents of Bullying, Harassment, Discrimination and Sexual Harm when engaged in University Activities or on University Premises.

The Procedure provides the procedural implementation of key principles in the University's *Student Conduct, Wellbeing and Safety Policy*, *Equity, Diversity and Inclusion Policy*, *Student Charter Framework*, and *Sexual Harm Prevention and Response Policy*.

2.0 Scope

This Procedure applies to all students of the University in all career levels, modes of study and locations, physical or digital, participating in activities organised by or under the control or direction of the University. For the purpose of this Procedure, the term "student" includes:

- all enrolled students and HDR candidates at the University; and
- students with 'active' enrolment status, including those who are not 'carrying load' and students on approved leave, including leave of absence, deferment or between enrolment periods.

This Procedure applies to Disclosures and Formal Reports by a student of Bullying, Harassment, Discrimination and Sexual Harm when engaged in University Activities or on University Premises.

The Procedure covers behaviour that occurs in-person, online or via digital technologies.

The Procedure does not apply to Disclosures and Formal Reports made by Employees and other workers (contractors, consultants, volunteers and unpaid academic appointees) of the University, which are managed under the relevant Employee complaints procedures.

3.0 Procedure

3.1 Understanding reporting and support options

1. The University supports individuals who have been affected by Bullying, Harassment, Discrimination or Sexual Harm to choose whichever course of action is best for them at the time,

depending on the severity of the incident, the type of incident, their own circumstances, and whether they feel safe and confident to make a Disclosure or Formal Report.

2. The University provides students with a number of options to notify the University about incidents of Bullying, Harassment, Discrimination or Sexual Harm. The University makes the following options available to students to seek assistance:
 - a. **Crisis Support** is available for students experiencing an emergency and who are in immediate danger.
 - b. **Student Safety and Wellbeing** supports a safe environment at Griffith University, providing confidential support to Employees and students relating to significant disruptive behaviours within the learning environment, on placement or anywhere on campus, concerns about someone harming themselves or others, Sexual Assault, Harassment or unwanted attention.
 - c. **Student Wellbeing and Accessibility** provides a range of health, medical, counselling, wellbeing and pastoral care services.
 - d. **The Counsellor (Violence Response and Prevention)** is responsible for coordinating priority access to counselling and referral to other specialist services for students who have been impacted by Sexual Harm.
 - e. **SASH Responders** can assist students and Employees when Sexual Harm has occurred by providing information about University policy and processes, support services and reporting options specific to Sexual Harm.
 - f. **Harassment and Discrimination Contact Officers (HDCOs)** can support students and Employees when Harassment, Bullying and Discrimination may have occurred. HDCOs provide information about the University's policies and procedures and promote a discrimination-free University environment. At any stage, information about options is available to all students from HDCOs, and they may be the first point of contact.
 - g. **Student associations** (Griffith University Gold Coast Student Guild, Griffith Student Representative Council (SRC), Griffith University Postgraduate Student Association (GUPSA), Gold Coast Association of Postgraduate students (GCAP) and Higher Degree Research (HDR) Advocates) are able to provide assistance and information to students.

3.2 Self-guided resolution

3. Before submitting a Formal Report for further intervention by the University, self-guided resolution can be considered. Self-guided resolution is only suitable when a student feels safe and confident to do so. This option is not appropriate for experiences relating to Sexual Assault.
4. Self-guided resolution involves contacting the other person and telling them that the behaviour is unwelcome and requesting that it cease. This may be done orally or in writing. The other person may recognise and cease the behaviour to your satisfaction.
5. If the behaviour/s restarts, continues or escalates, you can seek further information through Disclosure or lodge a Formal Report.

3.3 Disclosure

6. A Disclosure is informing the University about an incident or witnessing of Bullying, Harassment, Discrimination or Sexual Harm without requesting the University to take action towards resolution. Disclosures will not result in an investigative process or referral of a respondent under the Student Conduct, Wellbeing and Safety Policy, Student General Conduct Procedure, or Employee misconduct process. The University may, however, be obligated to report incidents as described in section 3.10 Confidentiality, recordkeeping and mandatory reporting.

7. The University's response to a Disclosure will, to the extent possible, be guided by the wishes of the individual. In this regard, the affected individual may request the University provide incident-related support and resources, referral to health and wellbeing support, facilitate reasonable academic adjustments, and/or implement precautionary actions.

3.3.1 How to make a Disclosure

1. Submit a Disclosure online: A student may choose to submit a Disclosure online, providing relevant details about the incident via the **Report a Concern** form. The form provides the option to select 'Disclosure'.
2. Discuss a Disclosure with an individual listed in 3.1.2: A student may discuss a Disclosure about the incident with an individual listed in 3.1.2. During this discussion, the student may request the individual submit a Disclosure on their behalf.
3. Submit a Disclosure on someone's behalf: Another responder may lodge a form on behalf of a student at their request. The student can choose to disclose their identity or remain anonymous. An anonymous Disclosure may be appropriate if the individual does not wish the University to respond to the Disclosure but would like a record made of the incident.
4. When a **Report a Concern** is made, a unique identifying number is provided. This number can be used to escalate a Disclosure to a Formal Report at any time that the respondent remains a student, Employee or University Community member.

3.4 Formal Report

8. A Formal Report will result in the University undertaking an investigative process in accordance with the Student Conduct, Wellbeing and Safety Policy and the relevant processes outlined in the applicable industrial instrument (where the respondent is an Employee or other University Community member).
9. Following the lodgement of a Formal Report, the respondent will have the opportunity to respond to the allegations. For this reason, the respondent must be a student, Employee or University Community member.

3.4.1 How to lodge a Formal Report:

1. Students can lodge a Formal Report via the online **Report a Concern** form at any time. Another person may lodge a form on behalf of the student at their request. A **Report a Concern** can be made anonymously.
2. If a student has previously submitted a Disclosure online about the same incident or behaviour, they can use the unique identifying number to escalate the Disclosure to a Formal Report. If required, additional details can be provided to the University as part of the investigative process.
3. When lodging a Formal Report, students are asked to provide as much information as possible about the incident or behaviour, including:
 - a. specific details of the incident/s (what, when, where and any relevant background information)
 - b. actions they have taken to resolve the issue (if appropriate)
 - c. contact the individual has had with the other person
 - d. contact the individual has had with University Employees regarding the incident or behaviour and any outcomes

- e. confirm that they want the University to investigate the issue, bearing in mind procedural fairness considerations (the respondent will be given the opportunity to defend and respond to the allegation)
 - f. outcome/s sought as a result of the concern.
4. Following submission of a Formal Report, the student who has made the report will receive a unique identifying number for the report. This unique identifying number can be used in future communication with the University.

3.5 Reporting as a group

Where several students have the same concern, they may act as a group in making a Disclosure or Formal Report to the University via the online Report a Concern form, provided that each student is seeking the same outcome and has consented to being included in the report.

3.6 Anonymous reporting

1. Students may choose to make a Disclosure or Formal Report of an incident or behaviour anonymously online via the **Report a Concern** form.
2. An anonymous Disclosure may be appropriate if the individual does not wish the University to respond to the Disclosure but would like a record made of the incident or behaviour.
3. While the University treats all reports seriously, it may or may not be able to fully investigate, provide notice of a decision or take action to resolve the concern when the source of the report is unknown.

3.7 Reporting to external organisations

A student may choose to report an incident or behaviour to an external organisation. When an external investigative process is occurring, this may cause the University to pause or cease an internal process, pending the outcome and findings from the external body.

3.7.1 Reporting Sexual Harm to police

5. Some forms of Sexual Harm constitute criminal offences. Therefore, a student may choose to report to the police at any time. Lodging a complaint with the Queensland Police Service (QPS) or other state police service will prompt a police investigation.
6. Alternatively, in Queensland, a victim-survivor may choose to report the matter anonymously to QPS using alternative reporting options (ARO). ARO provides police with the full circumstances of the assault with the option of remaining anonymous. An individual may choose to use this service at any stage of the University reporting process.

3.7.2 Reporting Bullying, Harassment and Discrimination

Upon completion of the University's response process, a student may choose to lodge a complaint about bullying, harassing or discriminatory behaviour with an external body such as the Queensland Human Rights Commission, the Australian Human Rights Commission or the Queensland Ombudsman.

3.7.3 Reporting online behaviours and incidents

7. A student may choose to report cyberbullying (children under 18), adult cyber abuse, image-based abuse and illegal and restricted content to the eSafety Commissioner at any time.
8. eSafety has powers relating to cyberbullying, image-based abuse, and illegal and harmful online content. They can investigate behaviours, provide support to victims and determine whether behaviours are in breach of the *Online Safety Act 2021 (Cth)*.

3.8 University response to Disclosures and Formal Reports

3.8.1 University response to Disclosures

1. When a Disclosure is made, the University will provide general information to the student on:
 - g. services and mechanisms which may aid in supporting the safety, security, health and wellbeing of affected individuals.
 - h. reporting options at and external to the University.
2. A unique identifying number (for online Disclosures only) will be provided that can be used in future communication with the University and to escalate the Disclosure to a Formal Report later.
3. Unlike a Formal Report, a Disclosure does not trigger an investigation or action unless the University has an obligation or a duty of care to act.
4. Students may also access services provided by the University where appropriate, such as the Counsellor (Violence Response and Prevention), a SASH Responder, Harassment and Discrimination Contact Officer, Campus Support (Security), Student Safety and Wellbeing and Student Wellbeing and Accessibility.
5. Where a student discloses or raises that they have experienced Sexual Harm outside of the University context, the University will provide support and assistance to the student to help their wellbeing and on-campus safety, despite not being able to take any action with regard to the conduct itself.

3.8.2 University response to Formal Reports

1. All Formal Reports will be handled in a procedurally fair manner. The health, wellbeing and academic progress of all parties will be supported in line with the University's duty of care.
2. The University will take all reasonable steps to ensure that the Formal Report investigation and resolution process is trauma-informed and avoids asking the person who experienced the behaviour to repeatedly tell their story to different people in different contexts.
3. The University may decline to take action in respect of a Formal Report that is assessed as unreasonable, including Frivolous, Vexatious or Malicious Reports. Individuals who submit such reports may be subject to investigation under the University's Student General Conduct Procedure.
4. On receipt of a Formal Report via the **Report a Concern** form, the individual who has made the Formal Report will receive acknowledgement within 24 hours of lodgment. The Deputy Registrar will nominate a coordinator to oversee the concern within three working days.
5. The nominated coordinator will oversee the Formal Report. They will act as a central contact point for the student who has made the report, establishing and maintaining a liaison relationship with relevant individuals. This might include people from the Academic Group, Course or Program, Campus Life, Griffith International, Griffith Graduate Research School and the Deputy Registrar to ensure support of the student's continued participation in their studies.
6. A student who has made a Formal Report may involve a support person of their choosing throughout the process and may withdraw from participating in the process at any time.
7. Student Life will undertake a preliminary investigation for the purpose of determining the action to be taken. In accordance with the Student Conduct, Wellbeing and Safety Policy and Staff Code of Conduct. The University may undertake interim actions and adjustments to support the student who has made the Formal Report while an investigative process is underway.

8. Interim actions and adjustments are intended to provide access to a safe environment, minimising exposure to risk and risk to others. Student Safety and Wellbeing and/or the nominated coordinator can support students in liaising with relevant Employees to request such interventions.
9. The University may put measures in place to support affected individuals, minimising the impact on their learning, work and academic progress. This may include:
 - a. Referral to counselling, peer and learning support
 - b. extending opportunities for special consideration in respect of course and assessment item/s
 - c. providing opportunities for an extension of time to submit, or deferred assessment as specified in the Assessment Procedure for students
 - d. limiting participation in, discontinuing or facilitating alternative arrangements for a professional practice activity
 - e. facilitating changes to study schedules and arrangements to reduce contact between and enhance safety for affected students.

3.9 Formal Report outcomes

1. Written advice concerning the outcome of a Formal Report will normally be provided within 10 working days of receipt of a reported concern. A student who has made a report will be notified of any unforeseen delays.
2. Formal Reports will be found to be:
 - a. Substantiated
 - b. Not substantiated
 - c. Substantiated in part
3. Outcomes will depend on the nature and seriousness of the alleged behaviour and may include, but are not limited to:
 - a. referral to the Student General Conduct process or Employee misconduct processes. More information, including rights to review and appeal of decisions made on these matters, are outlined in those processes.
 - b. mediation or facilitation (noting mediation may not be an appropriate action for incidents related to Sexual Harm, especially Sexual Assault)
 - c. further monitoring of the situation
 - d. apology or statement of regret
 - e. referral to support services
 - f. training
 - g. academic support such as special consideration
 - h. requirement to change processes or procedures
 - i. referral to external providers such as police.
4. A Formal Report is equivalent to step 2 under the Student Complaints Policy. Students who are dissatisfied with a Formal Report process or outcome may be able to refer the matter to the University Ombudsman, if they meet the criteria for step 3 outlined in the Student Complaints Policy.

3.10 Confidentiality, recordkeeping and mandatory reporting

5. 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 student who has made the report, information gathered for the purpose of understanding the grounds upon which an outcome was determined, and the actions taken to address the concern.
6. De-identified data from Report a Concern will be used to inform and improve the University's response and procedures.
7. Formal Reports and Disclosures will be kept confidential. Information may only be disclosed to others in circumstances where there is consent from the student who has made the report; where it is necessary by virtue of a person's role in the investigative and report handling process; where there is a risk of harm to person or persons; or as required by law.
8. The University has a mandatory obligation to report allegations of Sexual Assault or Sexual Harassment that involves individuals currently aged under 16 years or 18 years where there is an impairment of the mind (whether as victim, perpetrator or witness). Such allegations must be reported to relevant agencies, which may include **Queensland Police**.
9. 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

For the purposes of this procedure, the following definitions apply:

Bullying is repeated, unreasonable behaviour by an individual or group, directed towards an individual or group, either physical or psychological in nature, that intimidates, offends, degrades, humiliates, undermines or threatens.

Consent, in the context of making a Disclosure or Formal Report, is where an individual is not pressured and freely agrees to report allegations of Bullying, Harassment, Discrimination and Sexual Harm.

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

Discrimination can be either direct or indirect. Direct Discrimination occurs when someone is treated unfavourably because they have one or more protected attributes. Indirect Discrimination is when someone is disadvantaged by an unreasonable requirement, condition or practice because of a protected attribute.

Protected personal attributes cover:

- age
- breastfeeding
- employment activity
- gender identity
- disability
- industrial activity
- lawful sexual activity
- marital status or relationship status
- parental status or status as a carer
- physical features
- political belief or activity
- pregnancy
- race
- religious belief or activity
- sex
- sexual orientation
- an expunged homosexual conviction
- intersex status
- personal association whether as a relative or otherwise) with a person who is identified by reference to any of the above attributes.

Employees 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 Bullying, Harassment, Discrimination or Sexual Harm. A Formal Report will result in the University undertaking an investigation into the concern.

Frivolous Report is a complaint that is trivial in nature; or is sufficiently meritless that further action would be a waste of time or cost; or the extent of the complaint is out of proportion to the significance of the matter.

Harassment is behaviour or conduct that is unwelcome and unsolicited, and that makes an individual feel offended, intimidated, or humiliated. Harassment may be sexual or non-sexual in nature. Harassment may take multiple forms and have a variety of motivations. It can be a single incident, a series of incidents or an ongoing pattern of behaviour and can be perpetrated by individuals or groups of people.

Report a Concern is an online form for students and Employees to make either a Disclosure or Formal Report about an incident of behaviour concerning Bullying, Harassment, Discrimination or Sexual Harm. Disclosures and Formal Reports may be made anonymously.

SASH Responder is an identified Employee who has been trained to receive Disclosures of Sexual Harm with empathy and compassion and provide information about the options available.

Sexual Assault is unlawful and indecent assault or procuring a person to commit those. A child sex offence is a different offence.

Sexual Harassment is any unwelcome sexual advance, unwelcome request for sexual favours or other unwelcome conduct of a sexual nature, in circumstances where a reasonable person, having regard to all the circumstances, would anticipate the possibility that the person harassed would be offended, humiliated or intimidated.

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 harm may result in a person feeling uncomfortable, frightened, distressed, intimidated, or harmed either physically or psychologically.

University Activities means:

- using University equipment or resources (e.g. communication technologies, vehicles, facilities)
- using private communication methods to support or engage with University activities (e.g. setting up a Facebook group for students studying a particular unit to discuss their studies)
- being in attendance at a University event, function or activity
- participating in any activity as a representative or Student of the University (e.g. field trips, practicums, conferences, sporting trips, participation in a University affiliated club, community meetings etc.)
- carrying out functions in connection with a University-endorsed activity, including at places external to University premises (e.g. at licensed premises, private residence, in the street)
- activities outside of the University where there is a significant or substantial connection to the employment at the University
- other special circumstances relating to educational institutions, including participating in any activity or carrying out functions in connection with their position at the University where they come into contact with staff, students or other parties of a separate educational institution.

University Community

University community includes:

- enrolled students, including cross-institutional students and students on exchange from another institution
- employees and exchange employees
- employees of controlled entities, Centres and Institutes, and affiliated clubs and associations
- contractors and consultants performing work on University sites or on behalf of the University
- the Council and its committees
- any volunteer in the workplace and study environment
- clinical title holders, adjunct, visiting, honorary and conjoint appointees of the University.

University Premises means any University-owned, operated or occupied property or facility, unless operated by a third party provider which has its own policies that satisfactorily cover Sexual Harm prevention and response.

Vexatious or Malicious Report means a complaint where the person:

- knows it to be false; and
- complains for the primary purpose of damaging the University or the person against whom the report is made.

5.0 Information

Title	Student Reports of Bullying, Harassment, Discrimination and Sexual Harm Procedure
Document number	2024/0000065
Purpose	<p>Griffith University is committed to providing a safe, respectful and inclusive environment for all students, Employees, and other individuals who are part of the University Community.</p> <p>This Procedure details the processes for a student to Disclose and make Formal Reports about incidents of Bullying, Harassment, Discrimination and Sexual Harm when engaged in University Activities or on University Premises.</p> <p>The Procedure provides the procedural implementation of key principles in the University's <i>Student Conduct, Wellbeing and Safety Policy</i>, <i>Equity, Diversity and Inclusion Policy</i>, <i>Student Charter Framework</i>, and <i>Sexual Harm Prevention and Response Policy</i>.</p>
Audience	Students
Category	Academic
Subcategory	Student Services

UN Sustainable Development Goals (SDGs) This document aligns with Sustainable Development Goal/s:
3: Good Health and Well-Being

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Policy advisor Registrar

Approving authority Provost

6.0 Related Policy Documents and Supporting Documents

Legislation N/A

Policy [Equity, Diversity and Inclusion Policy](#)
[Resolution of Breaches of Residential Community Standards and other Grievances within the Griffith University Residential Colleges Policy](#)
[Sexual Harm Prevention and Response Policy](#)
[Student Charter Framework](#)
[Student Complaints Policy](#)
[Student Conduct, Safety and Wellbeing Policy](#)
[Student Critical Incident Management Policy](#)
[Student Review and Appeals Policy](#)

Procedure [Student Complaints Procedure](#)
[Student General Conduct Procedure](#)
[Student Review and Appeals Procedure](#)

Local Protocol N/A

Form [Report a Concern Form](#)
[Report a Concern \(anonymous\)](#)