

Student Reports of Gender-based Violence and Sexual Harm

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1.0 Purpose

Griffith University is committed to providing a safe, respectful and inclusive environment where Gender-based Violence and Sexual Harm are unacceptable.

This Procedure details the processes for students to make a Disclosure or Formal Report about incidents of Gender-based Violence and Sexual Harm.

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

2.0 Scope

This Procedure applies to:

- All Griffith University students in all career levels, modes of study and locations, including in connection with Student Accommodation. For the purpose of this procedure, the term 'student' includes:
 - all enrolled students and HDR candidates at the University
 - 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.
- Disclosures and Formal Reports by a student of incidents of Gender-based Violence and Sexual Harm, 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 Disclosures and Formal Reports of Gender-based Violence and Sexual Harm made by:

- Employees, Leaders and Workers of the University or Affiliated Organisations, which are managed under the relevant complaints procedures or terms of engagement.
- Members of the public, which are managed under the relevant complaint process.
- Incidents of Bullying, Harassment or Discrimination that are not gender- or sex-based, which are managed under the Student Reports of Bullying, Harassment and Discrimination Procedure.

3.0 Procedure

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, 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.

There are several options for Students to notify the University about incidents of Gender-based Violence or Sexual Harm.

3.1 Support options

The University makes the following options available to students to seek assistance:

- a. [Crisis Support](#) is available for students who require immediate wellbeing assistance.
- b. [Student Safety and Wellbeing](#) provides confidential, impartial support to students reporting Gender-based Violence or Sexual Harm, and to Employees concerned about student behaviours. [Information](#) The team can guide students through available support and reporting options and liaise with other areas of the University on their behalf to support wellbeing and academic progress.
- c. 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 Gender-based Violence and Sexual Harm. They can liaise with other areas of the University on a student's behalf to support wellbeing and academic progress.
- d. [Student Counselling](#) and [Chaplaincy](#) provide counselling, wellbeing and pastoral care services.
- e. [Respect Officers](#) can assist students and Employees when Gender-based Violence or Sexual Harm has occurred by providing information about University policy and processes, support services and reporting options.
- f. [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) can provide assistance and information to students.
- g. Support and pastoral care contacts in Student Accommodation.
- h. The University's [Safe Campuses](#) website provides information about preventing and responding to Gender-based Violence and Sexual Harm, including a range of internal and external support options.

3.2 Self-guided resolution

Self-guided resolution may be an appropriate option for students 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 student is ever required to address harmful behaviour directly; however, the University recognises that some students 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 students 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.

3.3 Disclose to the University

A Disclosure is informing the University about an incident of, or witnessing of, Gender-based Violence or Sexual Harm without requesting the University to take action towards resolution. Disclosures will not automatically result in an investigative process or referral of a Respondent under the *Student Conduct*,

Safety and Wellbeing Policy, Student General Conduct Procedure, or Employee misconduct process. The University may, however, be obligated to report or investigate incidents as described in section 3.10.

3.3.1 How to make a Disclosure

Submit a Disclosure online:

- A student may submit a Disclosure online by providing relevant details about the incident via the [Report a Concern](#) form. The form provides the option to select 'Disclosure'.
- Disclosures can be made anonymously (see section 3.6) by a student or an individual on behalf of the student.

Request assistance to make an online Disclosure:

- A student may request that another individual submit a Disclosure on their behalf via [Report a Concern](#).

Make a Disclosure to another person:

- A student may discuss a Disclosure with an individual listed in 3.1, noting that these individuals have received training or formal education in responding to disclosures.

3.3.2 Disclosing incidents in Student Accommodation

A student who discloses to an Affiliated Student Accommodation Provider may escalate the matter to the University using the [Report a Concern](#) form.

3.3.3 Record of a Disclosure

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.

3.4 Formal Report

A Formal Report is a request for the University to undertake an investigative process.

While the University is required to investigate all Formal Reports, the scope of any investigation may be limited when Respondents cannot be identified, when reports are submitted anonymously, or when the individuals involved are not students, Employees, or Leaders of the University. Where a Respondent is identified and connected to the University, they will be provided an opportunity to respond to the allegations in accordance with procedural fairness.

3.4.1 How to lodge a Formal Report:

Submit a Formal Report online:

- Students can lodge a Formal Report via [Report a Concern](#) form at any time.
- Formal Reports can be made anonymously (see section 3.6) by a student or an individual on behalf of the student.

Request assistance to lodge a Formal Report:

- A student may request another individual submit a Formal Report on their behalf, using the Report a Concern form.
- Student Safety and Wellbeing will provide information about University processes and can submit a Report a Concern on behalf of a student as part of usual service provision.

Escalate a Disclosure:

- 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.

- Additional details can be provided to the University as part of the investigative process.

3.4.2 Reporting incidents in Student Accommodation

A student who resides in Student Accommodation can request the University to lead an investigation into an incident or behaviour by submitting a Formal Report using the online [Report a Concern](#) form.

3.4.3 What to include in a Formal Report

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) contact the individual has had with the other person
- c. contact the individual has had with University Employees regarding the incident or behaviour and any outcomes
- d. whether the matter has been reported to an external organisation, such as the Queensland Police Service
- 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.

3.4.4 Record of a Formal Report

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

Students may choose to make a Disclosure or Formal Report of an incident or behaviour anonymously online via the [Report a Concern](#) form. Anonymous reporting allows an individual to inform the University about an incident or behaviour without providing identifying information.

If an individual lodges a [Report a Concern](#) on behalf of a student, the student may choose to disclose their identity or remain anonymous. Where the student chooses anonymity, the individual should provide the student with the [Report a Concern](#) unique identifying number as a record of the submission.

Anonymous reports may still contribute to broader safety improvements, even when direct engagement with the reporting process is not possible or desired.

3.6.1 Anonymous Disclosures

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.

Students should be aware that the University's ability to assess safety risks, offer support or respond meaningfully may be limited if the Discloser's identity is not provided.

3.6.2 Anonymous Formal Reports

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 to police

Behaviours that constitute gender-based, hate crimes or vilification can be reported to police. Some forms of Gender-based Violence and 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 could prompt a police investigation.

Alternatively, in Queensland, a victim-survivor of Gender-based or Sexual Harm violence 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 to the Queensland Human Rights Commission

A student may choose to lodge a complaint about sexual harassment with the Queensland Human Rights Commission.

3.7.3 Reporting to the eSafety Commissioner

A student may choose to report cyberbullying (online behaviour impacting children under 18), adult cyber abuse (online behaviour impacting people 18+), image-based abuse and illegal and restricted content to the eSafety Commissioner at any time.

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)*.

3.7.4 Reporting to the National Student Ombudsman

A student who is dissatisfied with a Formal Report decision, or with the manner in which the Report was handled by the University, may choose to lodge a complaint with the National Student Ombudsman (NSO). The NSO is a free and independent service to enable students to resolve complaints about their higher education provider. The NSO is not a decision-maker but may recommend to Griffith University how the decision process could be improved. Guidance on the types of complaints the NSO handles is available on the [NSO](#) website.

3.8 University response to Disclosures and Formal Reports

On receipt of a Disclosure of Formal Report via the [Report a Concern](#) form, the University will:

- a. provide a unique identifying number as record of the submission
- b. provide an acknowledgement to the individual who has made the Disclosure or Formal Report within 24 hours of lodgment (where contact details are provided).

The University's response to a Disclosure or Formal Report will be person-centred and trauma-informed and, to the extent possible, be guided by the wishes of the individual. In this regard, the Discloser and the Respondent may request the University provide incident-related support and resources, referral to health and wellbeing support, facilitate reasonable academic adjustments, and/or

implement interim precautionary actions. Disclosers and Respondents will be notified when referrals are made.

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

Where a risk assessment determines that interim measures are required, the Student Safety and Wellbeing Team will work with the impacted individuals to develop a support plan to ensure the necessary strategies are in place to support their safety and wellbeing. Immediate actions and interim measures are described in section 3.8.3 of the Student General Conduct Procedure and may include the following interim directives:

- a. measures to ensure that all parties are safe and that the student is offered the support necessary to return to study
- b. directions to a student not to attend campus or other Griffith premises
- c. directions to a student relating to contact or communication with other students, Employees, Leaders or Workers at the University
- d. conditions or restrictions on the times or dates or the way in which a student may attend Griffith premises or participate in Griffith-related events, activities, and functions, including where those events or activities occur online
- e. restrictions on a student's access to or use of University facilities or resources, including but not limited to computing and network facilities, such as online learning portals, email or other technology infrastructure or services.

The University may also put measures in place to support affected individuals, whether or not an investigation takes place, with the goal of minimising the impact on their learning, work and academic progress. Student Safety and Wellbeing and/or the nominated coordinator can support students in liaising with relevant areas of the University to request such interventions. 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.

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

Students may lodge a complaint with the National Student Ombudsman if they do not feel safe reporting to the University.

3.8.1 University response to Disclosures

When an online Disclosure is made via the [Report a Concern](#) form, the University will provide general information to the student on:

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

Where it is necessary for the safety and wellbeing of Students and/or Employees, the University may investigate a Disclosure. The Discloser will be notified if the University intends to investigate a

Disclosure and will seek and consider the views of the student/s who have disclosed before progressing a Disclosure to an investigation or disciplinary process.

Individuals receiving a Disclosure from a student are required to inform the University of the Disclosure via [Report a Concern](#). If the student has not provided consent, the anonymous form option must be used.

3.8.2 University response to Formal Reports

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.

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

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.

The University will nominate a coordinator to oversee the concern within three working days of receipt of a Formal Report. The nominated coordinator will:

- a. oversee the Formal Report.
- b. 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, Student Accommodation, Griffith International or Griffith Graduate Research School to ensure support of the student's continued participation in their studies.

A preliminary investigation will be undertaken for the purpose of determining the action to be taken. Preliminary investigations will maintain a regard for procedural fairness and be conducted in a trauma-informed manner that prioritises the safety and wellbeing of all people involved. Neither a Discloser nor a Respondent will be required to provide physical evidence for any investigative process.

The Discloser and Respondent will be notified on the same day that an investigation is to commence, with the Discloser notified first.

As described in section 3.8, the University may undertake interim actions where a risk assessment identifies a support plan is required for the Discloser and Respondent while an investigative process is underway.

3.9 Formal Report actions

Written advice concerning the proposed action to be taken following the investigation of a Formal Report will be provided within 10 working days of receipt of a reported concern. Wherever possible, the Discloser will be consulted about their wishes for further steps.

Unless requested otherwise, the Discloser will receive advice on the proposed action on the same day as the Respondent. Both parties will be notified of any unforeseen delays.

3.9.1 Formal Report actions

Following an investigation, Formal Reports will:

- a. be referred to a conduct process such as the *Student General Conduct Procedure* or Employee, Leader or Worker misconduct processes (noting that these processes include additional steps, timelines and rights to review and appeal, as outlined in those processes) and/or
- b. result in a safety and support intervention(s) or

- c. result in no further action being taken where a conduct referral or safety and support interventions are not appropriate.

3.9.2 Safety and support interventions

Safety and support interventions will depend on the nature and seriousness of the alleged behaviour and may include, but are not limited to:

- a. Mediation or facilitated discussion (noting this may not be appropriate for incidents of Sexual Harm).
- b. Further monitoring of the situation.
- c. Apology or statement of regret.
- d. Referral to support services.
- e. No-contact directives.
- f. Direction to develop an action plan in conjunction with Student Safety and Wellbeing team.
- g. Training or educational interventions.
- h. Academic support, such as special consideration.
- i. Requirement to change processes or procedures.
- j. Referral to external providers, such as the police.

3.10 Confidentiality, recordkeeping and mandatory reporting

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 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. Deidentified 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

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

Affiliated Student Accommodation Provider means a provider of accommodation to students that is affiliated with the University by:

- any statute, constitution or similar legal instrument that governs or otherwise regulates the University

- having a service agreement or other agreement with the University
- operating on the University's lands
- being authorised by the University to use its intellectual property in its recruitment or marketing materials or on its website
- being listed by the University on its website as 'student accommodation' or being promoted by the Provider in its recruitment or marketing material.

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 Gender-based Violence and Sexual Harm.

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

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

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 Gender-based Violence or Sexual Harm. A Formal Report will result in the University undertaking an investigation into the concern.

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. This includes behaviours that happen in-person, online and using digital technology.

Hate crimes are specific criminal acts which are motivated by hate and based on prejudice or bias against an individual, or a group of individuals, because of attributes such as race, religion, sexuality, sex characteristics or gender identity.

Leadership/Leaders 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 a Disclosure or Formal Report about an incident of behaviour concerning Gender-based Violence or Sexual Harm. Disclosures and Formal Reports may be made anonymously.

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

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. A single incident is enough to constitute Sexual Harassment – it does not have to be repeated.

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.

Student Accommodation means accommodation offered or provided to a Student by the University directly or an Affiliated Student Accommodation Provider.

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.

Worker 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	Student Reports of Gender-based Violence and Sexual Harm Procedure
Document number	2026/0000423
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 Gender-based Violence 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, Safety and Wellbeing Policy, Equity, Diversity and Inclusion Policy, Student Charter Framework, and Gender-based Violence and Sexual Harm Prevention and Response Policy</i>.</p>
Audience	Students
Category	Academic
Subcategory	Student Services
UN Sustainable Development Goals (SDGs)	<p>This document aligns with Sustainable Development Goal/s:</p> <p>5: Gender Equality</p> <p>3: Good Health and Well-Being</p>
Approval date	26 February 2026
Effective date	Trimester 1 2026
Review date	2027

Policy advisor Registrar

Approving authority Provost

6.0 Related Policy Documents and Supporting Documents

Legislation Universities Accord (National Higher Education Code to Prevent and Respond to Gender-based Violence) Act 2025
 Child Safe Organisations Act 2024 (Qld)

Policy Equity, Diversity and Inclusion Policy
 Gender-based Violence and Sexual Harm Prevention and Response Policy
 Resolution of Breaches of Residential Community Standards and other Grievances within the Griffith University Residential Colleges 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 Reports of Bullying, Harassment, Discrimination and Sexual Harm Procedure
 Student Review and Appeals Procedure

Local Protocol Complaints and Grievances

Form Report a Concern Form
 Report a Concern (anonymous)
