



Gender-Based Violence Whole of Organisation Prevention and Response Plan

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1. Trinity Residential College

Trinity Residential College is a leading university residential community located on campus at the University of Western Australia. Affiliated with the Uniting Church, we provide a supportive and enriching home for more than 420 tertiary students from across Australia and around the world. Our resident experience is grounded in our core values of culture, care and community.

Founded in 2002 following the amalgamation of Kingswood College and St Columba Colleges, Trinity Residential College occupies a 6.2-acre site on the doorstep of the Swan River, Kings Park and the Perth CBD. The College accommodates students from all Perth universities and tertiary institutions, the vast majority of whom study at UWA.

We offer a high-quality residential experience that combines academic support, pastoral care and an active social calendar. Our lush grounds, in-house catering, on-site amenities and all-inclusive fee structure, create a comfortable and well-resourced environment where every resident can find their place.



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Our College culture embraces the diverse backgrounds, identities and perspectives our residents bring to residential college life, using this richness to foster belonging and connection. Through personalised support and a wide range of programs, residents are encouraged to explore new interests and extend themselves, developing life skills that shape confident and independent adults.

Trinity Residential College employs 68 members of staff, which includes 23 Resident Advisors, and is led by a Board comprising 10 members. The Head of College and CEO leads the strategic vision of the College, and the Deputy Head of College oversees the operational plan. The College Leadership Team (CLT) comprises of the Head of College and CEO, Deputy Head of College, Director of Finance and Administration and Director of Marketing and Community Relations. Three staff reside full-time on campus.

2. Introduction

National rates of gender-based violence (GBV) in Australia are unacceptable and for too long have not been addressed in a comprehensive manner. Trinity Residential College wholeheartedly supports the implementation of the National Higher Education Code to Prevent and Respond to Gender Based Violence, being aware that tertiary residential college campuses are higher-risk environments for GBV incidents and are committed to reducing the occurrence of all forms of sexual harm.

This Whole-of-Organisation Prevention and Response Plan outlines the College's approach to preventing and responding to gender-based violence in accordance with the National Code to Prevent and Respond to Gender-Based Violence in Higher Education (2025). The Plan establishes a coordinated, evidence-and-trauma informed framework that prioritises safety, support, accountability and continuous improvement across all areas of College operations.

It has been informed directly by the College's Whole-of-Organisation Assessment, which identified key enablers, systemic risks and barriers within a residential college context. The actions set out below respond explicitly to those findings and are designed to strengthen consistency, capability, governance and cultural leadership. A copy of this assessment is provided in Appendix A.

The Plan has been developed with a commitment to engage and consult with staff, residents and student leaders and will be implemented in collaboration with the University of Western Australia and specialist external providers.

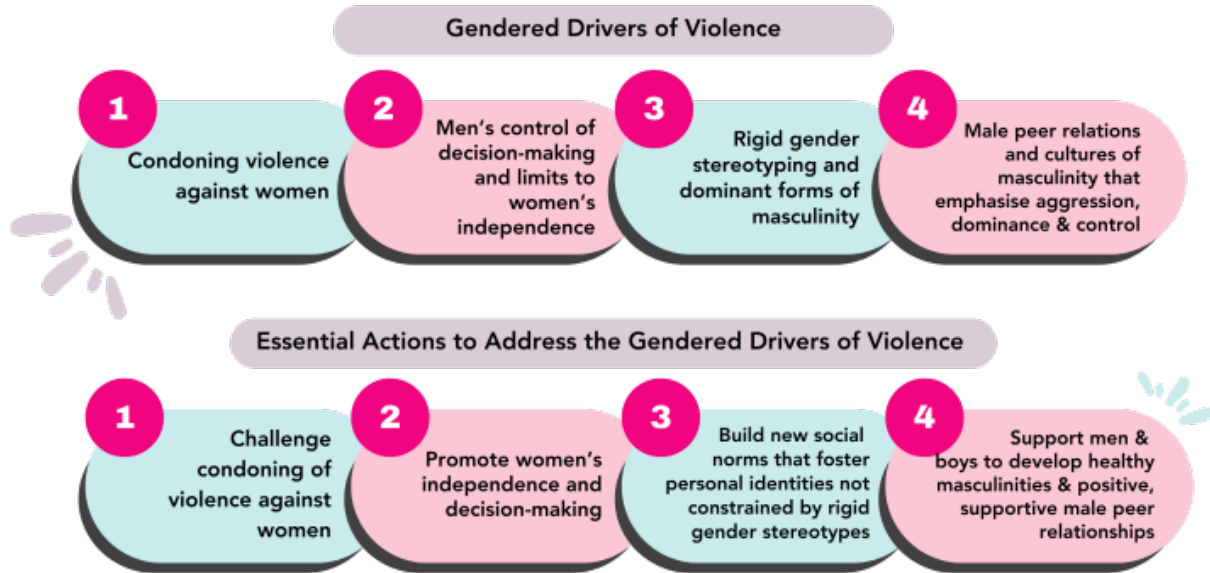
Drivers of Gender-Based Violence

Our Whole-of-Organisation Assessment and Plan are framed by an understanding of the gendered drivers of violence against women as outlined in Australia's 2012 national framework to prevent violence against women, Change the Story, (Our Watch). These underpin the



National Plan to End Violence Against Women and Children 2022–2032, a framework to end gender-based violence in one generation.

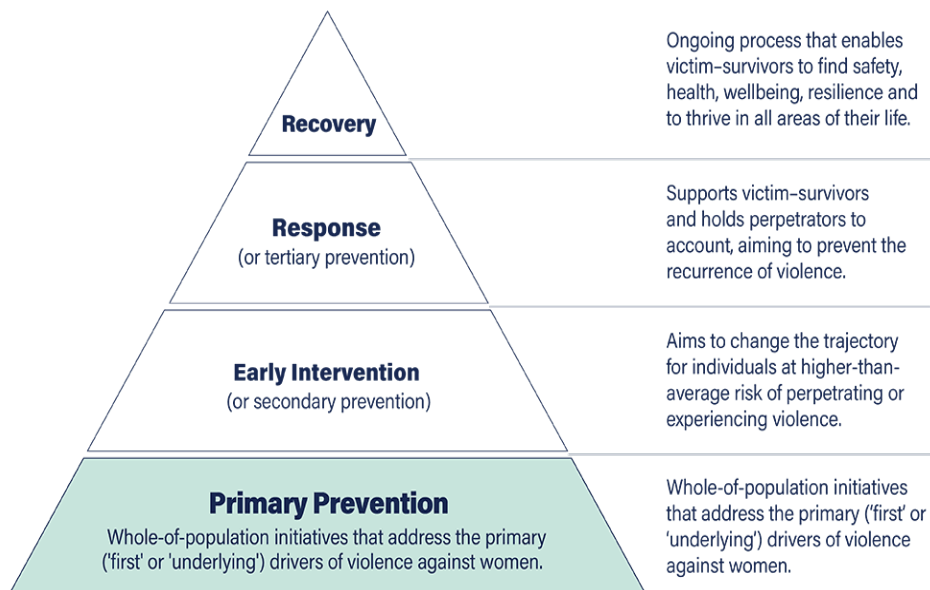
These gendered drivers are:



Source: womenshealth.org.au/home

Prevention and Response to GBV at Trinity Residential College

Given the prevalence of violence against women in society, primary prevention and early intervention are essential in a residential college setting. The College commits to adopting a 'primary prevention' approach addressing the underlying, gendered drivers of violence against women with the aim to stop violence before it happens.



Source: ourwatch.org.au/what-is-primary-prevention



3. Structure

Trinity Residential College's Whole of Organisation Prevention and Response Plan is focused on the five key requirements outlined in the Code, identifying how it will comply, as informed by the Whole of Organisation Assessment. A summary of actions forms the basis of the Plan and display a commitment to best practice, education, training, campaigning and continuous improvement.

These key areas are:

- Accountable Leadership and Governance (section 4)
- Safe Environments and Systems (section 5)
- Knowledge and Capability (section 6)
- Safety and Support (section 7)
- Data, Evidence and Impact (section 8).



4. Accountable leadership and governance

Mandatory Requirements

National Code Standard	Key actions	Evidence of compliance
<p>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.</p>	<ul style="list-style-type: none"> • Publish this Plan on the College website following Board endorsement. 	<ul style="list-style-type: none"> • Publicly available Plan on the College’s website.
<p>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.</p>	<ul style="list-style-type: none"> • Assign executive accountability to the Head of College and CEO, with operational responsibility delegated to the Deputy Head of College. • Establish GBV as a standing item for the Board Finance, Audit and Risk Management (FARM) Committee. • Integrate GBV risks into the College Risk Register and Incident Register. • Monitor implementation annually and formally review the Plan at least every four years. 	<ul style="list-style-type: none"> • Board minutes evidencing endorsement of Plan and oversight. • Review dates listed in the College’s Policy Register • Risk Register and FARM Committee reports on incidents. • Annual implementation and evaluation reports via student surveys on safety, satisfaction and programs. • Work with a GBV advisory organisation to review the whole of organisation prevention and response plan every four years.



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Additional actions from whole of organisation assessment

- Introduce annual governance-level GBV and trauma-informed practice training for Board and resident facing staff. To be trained within six months of joining Trinity.
- Table biannual environmental and cultural safety audit findings at Board level.



5. Safe environments and systems

Mandatory Requirements

National Code Standard	Key actions	Evidence of compliance
<p>7.4a 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 staff to declare prior GBV investigations, substantiated findings and conflicts of interest, including intimate relationships with residents. • Updated staff declaration and conflict-of-interest forms. • Update recruitment and promotion procedures. • Publish the GBV Policy and review schedule on the website and portal. • Consider declarations in recruitment, promotion and recognition decisions. 	<ul style="list-style-type: none"> • All current staff, including Resident Advisors, to disclose details on a declaration form • All new employees to complete declaration form as part of their employment onboarding. • Documented procedure plan in place for monitoring associated risks in the event of a disclosure of previous or ongoing allegation of GBV or a conflict of interest.



National Code Standard	Key actions	Evidence of compliance
<p>7.4b 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 use of non-disclosure agreements unless requested by the Discloser Ensure that non-disparagement clauses are not used. Ensure GBV policy includes statements on NDAs. 	<ul style="list-style-type: none"> College GBV Policy clearly states that the use of NDAs and non-disparagement clauses are not permitted, unless the discloser requests them.
<p>7.4c 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"> Implement UWA's adapted GBV Policy Review policy every three years in consultation with residents, staff, disproportionately affected groups, those who have experienced GBV and subject matter experts. 	<ul style="list-style-type: none"> College publishes UWA's GBV Policy on its website and clearly outlines the internal procedure should a disclosure occur of GBV. Consultation with UWA will take place in the third year of the review cycle and amendments made if necessary.



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Additional actions from whole of organisation assessment

- Introduce a secure, centralised case management system for GBV disclosures.
- Review after-hours escalation protocols and physical security controls.



6. Knowledge and capability

Mandatory Requirements

National Code Standard	Key actions	Evidence of compliance
<p>7.5 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, Resident Advisors and residents to complete prevention education and responding to disclosures training that meets Standard 3 and is tailored to residential settings and the level of resident-facing responsibility of each person. • Deliver or approve training in partnership with UWA and specialist providers. • Promote evidence-based prevention messaging throughout the resident lifecycle. 	<ul style="list-style-type: none"> • Training completion and attendance records. • Training framework in place for Staff, RAs, fresher and returning residents and contractors/visitors to Trinity. • Evaluation reports and program updates recorded.



<p>7.6 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 all risk assessments are conducted by suitably qualified personnel, engaging external expertise where required.	<ul style="list-style-type: none">• UWA specialist staff will conduct all risk assessments within 48 hours of a disclosure being made.
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Additional actions from whole of organisation assessment

- Annual refresher training for returning staff and residents.
- Capability uplift for Resident Advisors through scenario-based learning and supervision.
- The College will create a committee of residents and staff who meet each month to evaluate cultural issues, specifically inclusivity, resident programs, and student behaviour. A report will be submitted to the Deputy Head of College after each meeting.



7. Safety and support

Mandatory Requirements

National Code Standard	Key actions	Evidence of compliance
<p>7.7a-c 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"> Implement a trauma-informed response framework for all disclosures, ensuring resident choice, control, confidentiality and dignity are prioritised. Require all staff with resident-facing or response roles (including Resident Advisors, on-call staff and College Leadership Team) to complete trauma-informed GBV response training, refreshed annually. Maintain and regularly review clear disclosure pathways, including anonymous and informal disclosure options. Establish and formalise referral pathways to specialist internal and external support services, including: 	<ul style="list-style-type: none"> GBV Policy and Response Protocol explicitly referencing trauma-informed practice. Training framework and completion records for staff, Resident Advisors and on-call personnel. Agreements with UWA and external specialist services. Resident Portal content and orientation materials outlining support services and disclosure pathways and in every resident room. Records of periodic review of support pathways and materials. Support plan templates aligned with Standard 4.



	<ul style="list-style-type: none"> ○ UWA Student Wellbeing and Safer Communities ○ Local sexual assault and domestic violence services ○ Crisis and after-hours support services. • Ensure residents and staff are proactively informed of support options through orientation, handbooks, posters, digital platforms and regular communications. 	<ul style="list-style-type: none"> • Monitoring and review notes within case files.
<p>7.7d 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"> • Require a documented risk assessment to be undertaken following every disclosure or formal report of GBV. • Ensure risk assessments are conducted by appropriately trained staff, with escalation to specialist or external expertise where required. • Embed risk assessment into the College’s case management system, 	<ul style="list-style-type: none"> • Appropriately trained staff will maintain records of every risk assessment completed. • The College will maintain records of any support plan for the discloser and, if applicable, the respondent. • Case management records evidencing timely completion of risk assessments and support plans.



	<p>with clear documentation, review points and escalation triggers.</p> <ul style="list-style-type: none"> Review and update risk assessments where circumstances change or new information arises. 	<ul style="list-style-type: none"> Records of specialist consultation where required.
<p>7.7e(i) 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.</p>	<ul style="list-style-type: none"> Implement Critical Incident and After-Hours Response Protocols to ensure timely, coordinated responses to GBV incidents. Prioritise relocation of the respondent, where necessary, to protect the safety and wellbeing of the discloser. Facilitate immediate access to support services following incidents occurring within the College or at college-organised events. Maintain capacity for temporary or permanent relocation of residents, 	<ul style="list-style-type: none"> Critical Incident Response and After-Hours Escalation Protocols. Case records demonstrating risk management actions, including respondent relocation where required. Accommodation relocation procedures and room allocation records. Incidents debrief and review documentation.



	<p>supported by clear decision-making authority and processes.</p>	
<p>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.</p>	<ul style="list-style-type: none"> • Maintain an agreed arrangement with UWA that means a suitably trained expert at UWA will lead the response as part of the disclosure process at the College. • Cooperate fully with the University-led response, including: <ul style="list-style-type: none"> ○ Sharing necessary information (with consent and on a need-to-know basis) ○ Implementing interim and final outcomes determined by the University • Clearly communicate this choice to residents at the point of disclosure. 	<ul style="list-style-type: none"> • National Code Affiliation Agreement to be signed with UWA outlining shared response arrangements. • College policy and procedure will clarify that a disclosure can be made directly to College staff or UWA staff, and the risk assessment and response will be conducted by suitably trained person. The College’s priority will be to support the discloser throughout the disclosure and beyond. • Information-sharing protocols aligned with privacy and safety obligations, signed by each UWA resident. • Case records evidencing cooperation with university-led responses. • Resident information materials explaining response options on every door,



		noticeboard, and Resident Portal, as well as explained during every orientation.
<p>7.e(iii) 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 	<ul style="list-style-type: none"> • Undertake a risk assessment within 48 hours of disclosure. • Implement immediate safety measures, including respondent relocation where required. • Develop and implement individualised support plans for both discloser and respondent within 48 hours, aligned with Standard 4. • Actively manage and monitor ongoing risk, reviewing controls as required. • Share relevant information with the affiliated university where necessary to protect the safety of others, in line with agreed protocols. • Strengthen after-hours response capacity, including staff availability, 	<ul style="list-style-type: none"> • College policy and procedure will clarify that a disclosure can be made directly to College staff or UWA staff, and the risk assessment and response will be conducted by suitably trained person. • Documented procedures outlining 48-hour response timeframes. • Case management records demonstrating timely risk assessments and support plans. • Support plan templates aligned with Standard 4. • Information-sharing protocols with the affiliated university. • Monitoring and review notes within case files. • Updated on-call rosters and after-hours protocols. • Standardised support plan templates.



<p>meet requirements of Standard 4 within 48 hours.</p>	<p>escalation clarity and decision-making authority.</p> <ul style="list-style-type: none">• Standardise support planning templates to ensure consistency and quality for both disclosers and respondents.• Increase staff visibility and accessibility, particularly during high-risk periods and events.• Introduce periodic case review and supervision for staff involved in GBV responses.	<ul style="list-style-type: none">• Staff supervision and debriefing records.• Internal audit or review reports of GBV response cases.
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8. Data, evidence and impact

Mandatory Requirements

National Code Standard	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 and report GBV-related data in accordance with Standard 6.• Use de-identified data to inform continuous improvement and prevention strategies.• Establish feedback mechanisms informed by lived experience where appropriate.	<ul style="list-style-type: none">• Case management system reports.• Annual data summaries shared with the affiliated university on anonymous and identified disclosures.• Continuous improvement and evaluation documentation.

Additional actions from whole of organisation assessment

- Improve consistency in data capture and analysis.
- Use survey, exit and incident data to inform policy and program refinement.



9. Conclusion

Plan reflects Trinity Residential College's commitment to a whole-of-organisation, survivor-centred and accountable approach to preventing and responding to Gender-Based Violence. By addressing the systemic risks and barriers identified in the Whole-of-Organisation Assessment and strengthening existing enablers, the College aims to ensure a safe, respectful and compliant residential environment aligned with the National Code.

10. Glossary

Accountable Leadership and Governance

The systems, structures and processes through which the College's governing body and senior leadership exercise oversight, set expectations, allocate responsibility, monitor performance and ensure compliance with the national Code and relevant legislation.

Additional Actions

Actions identified through the Whole of Organisation Assessment that go beyond minimal compliance, designed to strengthen prevention, response, evaluation and continuous improvement.

The Code

The National Higher Education Code to Prevent and Respond to Gender-Based Violence which sets mandatory standards and requirements for higher education providers and student accommodation providers.

Discloser

A person who shares information about an experience of gender-based violence, whether formally or anonymously, and whether they choose to make a report or complaint.

Disclosure

The act of sharing information about an experience of gender-based violence. A disclosure can be made anonymously and may or may not lead to a formal complaint or investigation.

Early Intervention

Actions taken to identify, respond to and address concerns at an early stage to prevent escalation, reduce harm and support wellbeing.



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Gender-Based Violence (GBV)

Violence, abuse or harmful behaviour directed at an individual because of their gender, gender identity or sexual orientation, or that disproportionately affects women and gender-diverse people. This includes sexual assault, sexual harassment, intimate partner violence, coercive control and other related behaviours.

Gendered Drivers of Violence

The social and structural factors that create and reinforce gender inequality and increase the likelihood of violence against women, as defined in Change the Story.

Mandatory Requirements

Obligations set out in the National Code that student accommodation providers must meet, including requirements relating to governance, training, reporting, risk assessment, support and data collection.

Primary Prevention

Actions aimed at preventing gender-based violence before it occurs by addressing underlying drivers, norms and behaviours.

Respondent

A person whose behaviour is the subject of a disclosure, report or investigation relating to gender-based violence.

Response

The actions taken by the College following a disclosure or report, including risk assessment, safety planning, support provision, referrals, information sharing and disciplinary processes where required.

Risk Assessment

A structured process undertaken by trained and appropriately qualified staff to assess immediate and ongoing safety risks following a disclosure or report of gender-based violence.

Safe Environments and Systems

The physical, digital, policy and operational systems that reduce risk, support safety and enable appropriate prevention and response within the residential setting.



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Safety and Support

Trauma-informed, person-centred practices that prioritise the safety, wellbeing and agency of those affected by gender-based violence, including access to internal and external support services.

Trauma-Informed Practice

An approach that recognises the prevalence and impact of trauma, prioritises safety and choice, avoids re-traumatisation, and supports empowerment and recovery.

Whole-of-Organisation Approach

An approach that embeds prevention and response to gender-based violence across all areas of the organisation, including governance, leadership, staff, students, systems, culture and partnerships.

Whole-of-Organisation Assessment

A structured assessment of enablers, systemic risks and barriers across key areas of operation, undertaken to inform the development, implementation and continuous improvement of the Prevention and Response Plan.