

RAYMONT RESIDENTIAL COLLEGE

Whole-of-Organisation Prevention and Response Plan

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

1. Introduction

Raymont Residential College is a residential college affiliated with The University of Queensland (UQ), Queensland University of Technology (QUT) and the Australian Catholic University (ACU) and home to 133 residents from diverse cultural, educational and social backgrounds. Established in 1947 as an all-female college and transitioning to a gender-inclusive community in 1984, Raymont is committed to fostering an environment where all students feel safe, respected, included and supported. The College operates as an independent not-for-profit organisation governed by the Uniting Church of Australia, with day-to-day leadership provided by the Principal and Deputy Principal. Guided by the College's values of community, compassion, engagement, respect and inclusion, Raymont supports students to succeed academically, develop holistically, and contribute positively both within and beyond the College.

This Whole-of-Organisation Prevention and Response Plan outlines Raymont Residential College's commitments and actions to meet the requirements of the National Higher Education Code to Prevent and Respond to Gender-Based Violence (the National Code). It provides a coordinated, evidence-informed framework for preventing gender-based violence, supporting those affected, and ensuring timely, safe and accountable responses across all areas of college operations.

The Plan has been directly informed by Raymont Residential College's comprehensive Whole-of-Organisation Assessment, which examined enablers, systemic risks and barriers across leadership, culture, service delivery, systems, governance, and community engagement. The findings of that assessment underpin the actions and priorities set out in this document and ensure the Plan reflects the College's specific context, strengths and needs.

This Plan is structured into the key operational focus areas outlined under Standard 7 of the National Code and details:

- the mandatory requirements for each area
- the actions Raymont Residential College will take to meet these requirements
- the evidence that will demonstrate compliance
- additional actions arising from the Whole-of-Organisation Assessment.

In developing this Plan, Raymont Residential College has aimed to uphold its values, centre student wellbeing, and embed a culture that actively contributes to preventing gender-based violence. Ongoing engagement with residents, staff, and specialist partners will continue throughout the implementation of this Plan to ensure it remains responsive, person-centred and grounded in best practice.

2. Accountable leadership and governance

Mandatory requirements

7.2	National Code Standard summary	Key actions	Evidence of compliance
	<p>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 the Plan and ensure it is accessible to residents and staff. • Incorporate findings from the Whole-of-Organisation Assessment. • Conduct initial consultation with student leaders, with broader resident/staff consultation scheduled through the Consultation Plan. • Embed governance oversight through annual reporting to the Governance & Risk Committee and Council. 	<ul style="list-style-type: none"> • The Whole-of-Organisation Prevention and Response Plan is published on the Raymont Residential College website. • Summary of initial consultation with student leaders and staff, with broader consultation scheduled and documented in the Consultation Plan. • Description of leadership oversight arrangements.
	<p>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"> • Monitor implementation annually and report progress to Synod. • Evaluate using simple indicators (training completion, resident feedback, incident trends). • Undertake annual consultation activities as 	<ul style="list-style-type: none"> • Monitoring plan and draft KPIs (to be refined through consultation). • Annual reporting to Governance & Risk Committee. • Reference to Consultation Plan for annual and four-year review cycles.

National Code Standard summary	Key actions	Evidence of compliance
	<p>per the Consultation Plan.</p> <ul style="list-style-type: none">• Review and update the Plan at least every four years.	

Additional actions from whole-of-organisation assessment

3. Safe environments and systems

Mandatory requirements

National Code Standard summary	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 past GBV-related investigations and any relationships with residents.• Consider declarations when making employment or promotion decisions.• Use standardised Employment Screening Questions for all applicants, adaptable across recruitment platforms including SEEK.• Develop updated conflict-of-interest forms and processes for managing associated risks.• Review and monitor declarations through established HR and governance processes.	<ul style="list-style-type: none">• Employment Screening Questions document appended to the Plan• Procedure for considering staff declarations and managing risks appended to the Plan.• De-identified annual reporting to the Governance & Risk Committee.

National Code Standard summary	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 NDAs in GBV matters unless requested by the Discloser. • Ensure any NDA allows seeking support. • Prohibit non-disparagement clauses. • Review clarity of these statements through consultation. 	<ul style="list-style-type: none"> • Policy statement in GBV & Sexual Misconduct, Complaints Resolution, and Respect & Wellbeing Policies.
<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 Raymont Residential College's GBV-aligned policy suite. • Review at least every three years. • Conduct consultation during policy development. • Publish policies and include them as appendices to the Plan. 	<ul style="list-style-type: none"> • GBV-related policies appended. • Policy statements confirming Raymont uses its own policies. • Version control showing review cycle. • Documentation of staged consultation.

Additional actions from whole-of-organisation assessment

- *Embed regular policy accessibility audits to ensure GBV-related policies remain clear, visible and user-friendly across College platforms.*
- *Review opportunities to enhance physical and digital safety infrastructure (e.g., lighting, CCTV placement, secure access systems) informed by the Whole-of-Organisation Assessment.*
- *Introduce periodic scenario-based testing of emergency and safety protocols to build staff confidence and check procedural readiness.*

4. Knowledge and capability

Mandatory requirements

7.5	National Code Standard	Key actions	Evidence of compliance
	<p>A Provider must require a student accommodation provider to:</p> <ul style="list-style-type: none"> • require residents and staff to complete prevention education and training and responding to disclosures training that: <ul style="list-style-type: none"> ○ meets requirements of Standard 3 ○ is tailored to the student accommodation environment ○ is delivered or approved by the provider • promote evidence-based prevention messaging tailored to the student accommodation environment • evaluate any initiatives and use findings to inform future activities. 	<ul style="list-style-type: none"> • Provide mandatory training for all residents and staff. • Use Raymont Residential College and specialist providers. • Deliver evidence-based messaging. • Evaluate training via consultation feedback. 	<ul style="list-style-type: none"> • All residents, staff, student leaders, complete required prevention and responding-to-disclosures training through. • All new residents and staff complete a Raymont Online Induction covering GBV policies, procedures and reporting pathways. • Residents receive additional prevention education. • Specialist ChildSafe training completed by student leaders and senior staff as appropriate. • The Raymont Staff & Student Training Plan sets out required training and tracking arrangements. • Evidence-based prevention messaging delivered via independent channels; training effectiveness reviewed annually.
	<p>A Provider must require a student accommodation provider to ensure risk assessments are only undertaken by people with expertise prescribed in Standard 3, and when internal capability is not sufficient, engage a person with the requisite expertise.</p>	<ul style="list-style-type: none"> • Ensure GBV risk assessments are completed by qualified persons. • Engage external specialists when needed. • Train staff on escalation pathways. • Review processes through consultation. 	<ul style="list-style-type: none"> • Raymont Residential College will ensure that risk assessments required under the Code are undertaken by staff and meet the capability requirements of Standard 3.14. Where additional expertise is required, Raymont Residential College will engage external qualified practitioners.

Additional actions from whole-of-organisation assessment

- *Develop processes for annual review of training content to ensure alignment with emerging evidence and student needs.*
- *Implement a structured training completion monitoring system.*
- *Establish a mechanism for staff reflection and debrief following significant incidents, supporting continuous learning and wellbeing.*

5. 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"> Ensure trauma-informed responses and support. Provide access to internal and external supports. Communicate clear pathways and policies to residents and staff. 	<ul style="list-style-type: none"> Staff and student leaders and complete Respect and Responding to Disclosures training, ensuring trauma-informed and person-centred practice. Specialist capability strengthened through ChildSafe training for senior staff and leaders. Clear referral pathways promoted through online induction, resident handbook, policy documents, and College communications. Policies and support options available on the College website and distributed via resident orientation and staff onboarding.
<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"> Undertake a risk assessment within required timeframes. Ensure safety planning and escalation processes are followed. Document and monitor actions. 	<ul style="list-style-type: none"> Raymont Residential College has an established Risk Assessment and Safety Planning Procedure triggered after every disclosure or formal report. Risk assessments are completed by trained senior staff who have undertaken training and ChildSafe leadership modules. Risk assessments consider safety, wellbeing, accommodation adjustments, contact restrictions, and referral pathways. Completed assessments and actions are documented, reviewed by senior staff, and updated as circumstances change. The procedure ensures compliance with the Code's required timeframes and escalation expectations.

National Code Standard	Key actions	Evidence of compliance
<p>7.7ei 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"> • Act immediately to manage risk following a disclosure. • Implement protective measures, including relocation where required. • Ensure urgent access to support services. 	<ul style="list-style-type: none"> • Raymont Residential College follows established Critical Incident and Safety Response Protocols, which trigger immediate risk management actions following any disclosure involving behaviour in residence or at a college-related event. • Senior staff undertake an urgent risk assessment and may implement measures including temporary or permanent relocation of the respondent, adjusted access, no-contact directives, or modified engagement in college activities. • Disclosers and respondents are provided urgent access to support services, including medical services, counselling, and external crisis supports. • Actions are documented, monitored, and reviewed to ensure ongoing safety and compliance with Code requirements.
<p>7.7eii 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"> • Ensure disclosers may elect UQ, QUT, ACU or Raymont to lead the response. • Cooperate fully with UQ, QUT and ACU-led processes. • Implement all outcomes determined by UQ, QUT and ACU. 	<ul style="list-style-type: none"> • Raymont Residential College has formalised arrangements with the University of Queensland, Queensland University of Technology and Australian Catholic University Residential College Agreement for Prevention and Response to Gender-Based Violence (executed under Standard 7.9), which requires full cooperation with UQ, QUT and ACU-led responses and implementation of all outcomes. • Disclosers are informed that they may choose UQ Respect/SMSU, QUT, ACU or Raymont Residential College to lead the response, as communicated in policy documents, induction materials, and support resources. • Raymont Residential College follows established processes to share information,

National Code Standard	Key actions	Evidence of compliance
<p>7.eiii A provider must have arrangements in place with a student accommodation provider to enable a discloser to choose the student accommodation provider to lead the response to the disclosure, and the student accommodation provider must:</p> <ul style="list-style-type: none"> • undertake a risk assessment within 48 hours and from this determine necessary safety measures (including relocation of the respondent) and immediately implement them • manage and monitor risk • share necessary information with the provider to protect safety of others • implement support plans for both disclosers and respondents that meet requirements of Standard 4 within 48 hours. 	<ul style="list-style-type: none"> • Complete risk assessments within 48 hours. • Implement safety measures immediately. • Manage, monitor, and review risk. • Share information with UQ as required. • Develop and implement support plans for both parties. 	<p>coordinate safety measures, and adopt outcomes determined by UQ, QUT or ACU when they lead the response.</p> <ul style="list-style-type: none"> • Raymont Residential College has established Risk Assessment and Safety Planning Procedure, ensuring timely assessment, safety planning, and immediate implementation of protective measures. • Risk assessments are conducted by trained senior staff and may include relocation of the respondent, access adjustments, and no-contact arrangements. • Ongoing risk is managed and monitored through documented reviews and regular check-ins with involved parties. • Under the UQ, QUT and ACU-Residential College Agreement, Raymont Residential College shares required information with UQ, QUT and ACU to protect the safety of residents and staff, in line with Code obligations and privacy requirements. • Support plans for both disclosers and respondents are created and implemented within 48 hours, consistent with Standard 4 and College procedures. • Processes are reinforced through staff training, induction, and Critical Incident and Safety Response Protocols.

Additional actions from whole-of-organisation assessment

- *Formalise a pastoral care escalation framework to clarify responsibilities and boundaries for student leaders and staff.*
- *Strengthen after-hours support processes, including clearer communication of on-call roles and emergency contact pathways.*
- *Develop a simple student-facing guide outlining what happens after a disclosure, to reduce uncertainty and anxiety.*
- *Increase visibility of support services through campaign-style communication bursts at key points in the academic year.*

6. Data, evidence and impact

Mandatory requirements

National Code Standard summary	Key actions	Evidence of compliance
<p>7.8 A provider must require a student accommodation provider to collect and report data prescribed by Standard 6, where applicable.</p>	<ul style="list-style-type: none">• Collect required GBV-related data.• Establish secure systems for recording and reporting.• Share data with UQ in line with thresholds and privacy requirements.	<ul style="list-style-type: none">• Raymont Residential College collects required data under Standard 6 using secure internal systems, including implementation of the StarRez Communities module to record disclosures, outcomes, support plans, and related actions.• Data is held securely and only accessed by authorised senior staff, in line with privacy and confidentiality requirements.• Reporting thresholds and information-sharing obligations with the University are defined in the UQ, QUT and ACU–Residential College Agreement, including provision of non-identifying or identifying information where necessary to protect safety or meet Code obligations.• Data is provided to UQ, QUT and ACU at required intervals and formats to support all reporting obligations under the National Code.• Data collection and reporting processes are embedded in the Critical Incident and Safety Response Protocols and staff induction.

Additional actions from whole-of-organisation assessment

- *Conduct regular data quality audits to ensure accuracy, consistency, and alignment with Standard 6 reporting requirements.*
- *Develop a dashboard or summary report template to support routine reporting to UQ, QUT, ACU and governance committees.*
- *Review and refine data retention and access protocols to ensure privacy, security, and minimal necessary access.*