

Gender-based violence prevention and response plan

1. Statement of commitment

Flo Harris Lodge (FHL) is founded on Christian faith and values. We are committed to providing a safe environment where all residents and staff are treated with courtesy, respect and fairness. We have a duty of care to help prevent and respond well to gender-based violence and sexual harm.

While student accommodation can be a site of risk, it also presents a unique opportunity to help prevent gender-based violence and ensure the safety and support for those who experience it. Accordingly, we resolve to:

- protect the safety and wellbeing of each member of our community
- facilitate a culture of respect and care within our community
- prioritise the safety, dignity and agency of people who report gender-based violence
- provide safe, person-centred, trauma-informed and procedurally fair responses to reports of gender-based violence.

The FHL Committee holds the Executive Chaplain accountable to ensure that there is a rapid and supportive response to reports of gender-based violence, that there is ongoing monitoring of the resident community, and that the committee is kept informed of any serious breaches of this policy.

2. Purpose

This policy strengthens governance and formalises our response to sexual harm and gender-based violence. It sets out:

- behaviours that are not accepted at FHL
- our commitment to prevent gender-based violence within our community, through multiple avenues, including the education of residents and staff
- how disclosures and formal reports of gender-based violence can be made
- how we will respond to disclosures and formal reports of gender-based violence.

It applies to all members of our community, including residents, their visitors, chaplains, staff, contractors and FHL committee members.

3. Flo Harris Lodge overview

We provide catered accommodation for tertiary students and young workers from regional NSW and overseas. We are a ministry of Petersham Baptist Church and are governed by a dedicated committee appointed by Petersham Baptist Church. In overview:

- We are located in Lewisham and accommodate around 50 residents, including 5 senior residents. Our staff comprise 3 live-in chaplains (a married couple and a male or female secondary chaplain), a business manager, and a chef.
- Our residents are aged between 18 to 25, with some turning 18 in their first year. While numbers change year-on-year, the gender split tends to be around 60% female and 40% male. Most residents come from regional NSW, but around 10% come from overseas. Students attend a range of tertiary institutions, with the majority undertaking bachelor-level courses. Typically, around 20 residents attend Sydney University, 10 attend Sydney Missionary and Bible College, and the remaining 20 attend a diverse range of institutions including the Conservatorium of Music and the Australian Film and Television School. There may also be 1 or 2 young workers.
- Each floor of the accommodation block is gender-based, with 9 or fewer residents and one senior resident who provides everyday care and support. The senior residents play a key role in creating an inclusive and respectful culture not only on their floors but across the whole community. The 5 senior residents are supported by 3 chaplains who live on site.
- The small size, strong sense of community, high level of support and supervision, and alcohol free status of our residence help to protect our residents from sexual harm and gender-based violence.

4. Background

4.1 National Higher Education Code to Prevent and Respond to Gender-based Violence 2025

This policy has been developed in accordance with the requirements of the National Higher Education Code to Prevent and Respond to Gender-based Violence 2025 (the Code).

Student accommodation that is controlled by, or affiliated with, a higher education provider must comply with Standards 7.2 to 7.8 of the Code. These requirements include:

- Developing and publishing a Whole of Organisation Gender-based Violence Prevention and Response Policy.
- Implementing policies on preventing and responding to gender-based violence.
- Building knowledge and capability through training and prevention initiatives.
- Ensuring person-centred, trauma-informed practices in supporting those who experience gender-based violence.

- Sharing data on gender-based violence with the higher education provider to support annual reporting of the Code.

4.2 Agreement with the University of Sydney

Higher education providers must have a legally binding written agreement with any student accommodation provider they control or are affiliated with to require compliance with these requirements.¹ As an affiliated accommodation provider, FHL entered into a Gender-based Violence Prevention and Response Agreement (Deed) with the University of Sydney. The agreement commenced on 1 January 2026 and ends on 31 December 2027.

In accordance with the Deed, we have developed and are implementing this policy to help prevent and respond to gender-based violence. The policy:

- records our approach to preventing and responding to gender-based violence that prioritises the safety and support of residents and staff
- addresses the factors that drive and contribute to gender-based violence as well as any factors relevant to FHL's context
- records how we will implement the requirements of paragraphs 7.2 to 7.8 of the Code.
- includes an assessment that identifies systemic risks, enablers and barriers to preventing gender-based violence
- includes actions that will be taken in response to findings of the assessment
- reflects the needs of all members of the community, particularly those members who are disproportionately affected by gender-based violence, including women, First Nations people, culturally and linguistically diverse communities, people with a disability, and people of diverse sexual orientation and gender identity
- has been developed through engagement with residents and staff.

The Deed also requires us to monitor and measure the impact of the prevention and response policy on an ongoing basis and update the policy at least every 4 years.

5. Planning, engagement and evidence

To inform the development of this policy, we:

- engaged with the senior residents, staff and FHL committee members
- reviewed evidence of the drivers, enablers, impact and extent of gender-based violence as well as best practice policy responses by other accommodation providers
- considered the systemic risks at FHL and how best to address them.

¹ National Higher Education Code to Prevent and Respond to Gender-based Violence 2025, Definitions, Affiliated Student Accommodation Provider (e). FHL is defined as an affiliated student accommodation provider because it is listed on the University of Sydney's website as 'student accommodation'.

5.1 Evidence based

Evidence is provided by the Gender-based Violence Regulator that sexual harassment and assault remain a serious problem within Australian universities.

Results of the 2021 National Student Safety Survey indicated that:

- sexual harassment and assault are common experiences for university students
- female, sexually and gender-diverse students, neurodiverse, and students with disabilities face higher risks
- few students formally report incidents
- significant mental health impacts were reported, often affecting academic performance and social life
- many students remain unaware of how to access university support services.

Of particular relevance to FHL as an accommodation provider, the survey found that:

- of those who experienced sexual assault in a university context, 1 in 4 reported that the most impactful incident occurred in student accommodation or residences
- student accommodation is also one of the most common sites where students seek support following incidents of sexual assault or harassment, regardless of whether the incident took place in the student accommodation setting or not.

5.2 Addressing the factors that may contribute to gender-based violence at FHL

Evidence from Change the Course (2017) and the National Student Survey (2021) shows that in university and college communities, gender-based violence is more likely to occur when:

- harmful social norms go unchallenged, such as acceptance of sexist attitudes or gender stereotypes
- hierarchical structures create power asymmetries between students, or between students and staff
- institutional culture minimises or fails to respond to problematic behaviours
- group dynamics lead to higher risk-taking behaviour, especially initiation rituals, and unsafe use of alcohol or other drugs.

Harms associated with gender-based violence are often exacerbated by:

- cultures that deter reporting through fear of retaliation, stigma, shame or distrust
- difficulties in accessing the right supports, at the right time
- systems and processes that are not trauma-informed or person-centred.

The proximity of students in shared living spaces, the presence of alcohol and gaps in supervision and oversight can exacerbate risk.

5.3 Responding to the systemic risks, enablers and barriers to preventing gender-based violence at FHL

Systemic risks in the context of FHL relate to staff and students living in proximity. Enablers of gender-based violence may include:

- the young age of the residents
- residents moving away from their usual support groups and the safety net of family for the first time
- a power discrepancy between staff/chaplains and residents
- a power discrepancy between female residents (and other at-risk-groups) and male residents
- alcohol consumed off campus.

5.4 Staff screening and declarations

In recognition of the high-risk environment where staff and students work and live in proximity, FHL has specific requirements related to staff. These requirements relate to screening and declarations.

FHL will request staff to declare if they've ever been investigated for or found to have engaged in gender-based violence, whether in previous roles or through legal processes, and consider any risks arising from substantiated allegations of gender-based violence when deciding if someone is suitable for a role or when considering staff for promotion or recognition.

FHL has incorporated employee declarations as part of our employment agreements which align with existing processes requiring a police check, current working with children check and completion of the Baptist Church Safe Spaces training or equivalent (e.g. The Anglican Safe Ministry training).

These declarations incorporate clear messaging about their purpose and place in FHL's policies to prevent and respond to gender-based violence. They also serve as a signal to prospective staff that gender-based violence is unacceptable.

FHL's staffing decisions will consider the nature of any disclosure, alongside information gathered from other mechanisms like criminal history checks and robust reference checks. Declarations do not preclude FHL from employing a candidate but allow for greater transparency and strengthened safety procedures.

These requirements reflect evidence that employees who become subject to an allegation of gender-based violence may cease employment or move to another organisation before an investigation is concluded.

Gender-based violence is deeply connected to imbalances of power and this can show up in intimate relationships.

Under the Code, FHL is also required to ask staff to declare any current or past intimate personal relationship with residents. And, if such a relationship exists, to put a conflict of interest or risk management plan in place. Intimate relationship declaration supports FHL to make informed assessment of risks and take actions to mitigate these risks. FHL is required to manage these disclosures sensitively and appropriately, in line with privacy laws.

5.5 Response procedures

The Code also recognises the important role student accommodation staff and leaders can play in responding to disclosures when disclosures or formal reports of gender-based violence are made involving a resident or staff member.

In responding to a disclosure of gender-based violence, the chaplains must:

- take action proportionate to the risk arising from the disclosure to ensure the safety of the discloser,² residents and staff
- undertake a risk assessment within 48 hours and determine safety measures to be implemented to protect the safety of the discloser and other residents
- implement support plans developed collaboratively with the discloser and respondent,³ if required, within 48 hours.

Where the chaplains lack the expertise to do this, they will make arrangements to ensure access to the right expertise.

The Code requires that residents and staff undertake education and training focused on prevention and responding to disclosures tailored to the accommodation environment. FHL chaplains will develop training for current and future staff. Student training will be provided by their relevant tertiary provider. At the start of each year, chaplains will reinforce that residents take this training seriously.

To provide accessible reporting channels, FHL will use an encrypted web-based reporting and case management platform (Cognito Forms) accessed through the Flo App.

6. Approach

This section provides an overview of how FHL will approach work to:

- address the factors that drive and contribute to gender-based violence, as well as any factors relevant to the provider's organisational context
- respond to gender-based violence wherever it is experienced by the organisation's students and staff.

The specific requirements and actions of FHL's Gender violence prevention and response policy are set out in the table in section 8 at the end of this document.

² A discloser is someone who shares information about their experience of gender-based violence.

³ A respondent refers to someone alleged to have used gender-based violence.

6.1 Accountable leadership and governance

FHL is a ministry of Petersham Baptist Church and is governed by a dedicated committee appointed by Petersham Baptist Church. The committee employs executive chaplains who oversee FHL, a part-time secondary chaplain, a business manager, a book keeper (off site) and a chef.

The leadership and governance structure of FHL reflects its small size. It is committed to the well-being of its residents as a core ministry. However, it may lack some of the expertise and resources available to larger student accommodation providers to fully understand the barriers to reporting gender-based violence and to provide trauma-informed support to victims of gender-based violence.

6.2 Safe environments and systems

The following features of FHL help protect our residents and staff from sexual harm and gender-based violence:

- The student accommodation is small (approximately 50 residents) which brings greater visibility.
- The sense of community is strong and is enhanced by eating dinner together, floor meetings and regular social events.
- Alcohol and drugs (recreational or prohibited) may not be consumed or stored on the premises.
- There is a high level of support and supervision.
- Each floor of the accommodation block has up to 9 residents and one senior resident, and is gender-based.
- The 5 senior residents play a key role in creating an inclusive and respectful culture. While not trained counsellors, they are tasked with regularly checking in on their residents' welfare.
- The senior residents are supported by 3 chaplains who provide a high level of pastoral support and oversight. They live on site and are contactable 24/7.
- The chaplains and senior residents have an extensive church-based awareness of, and compulsory training related to, working with children and other vulnerable people. The Executive Chaplain typically has professional training and experience in working safely with women and children.
- Chaplains undergo a pastoral screening process, which includes character references, alongside mandatory Working With Children Check clearances.
- Residents sign a contract agreeing to the expected attitudes and behaviours of living in community. When needed, these expectations are gently enforced by the senior residents.
- Visitors can only visit a resident's room by invitation. If the visitor is of the opposite gender, the door must remain open and they must leave by 9.30 pm. Similar rules apply to the women's and men's loungerooms and floors in general. Sexual activity is prohibited on site.

- Visitors must be accompanied. Anyone on the grounds who is not a resident, or with a resident, will be challenged by staff and/or a senior resident. Residents are encouraged to report unknown people on the grounds.
- We are a short distance from public transport. Female residents arriving home in the evening will often message the community to ask if someone will meet them at the train station.
- Senior residents check that locks to external gates, doors and windows are locked each evening. External locks are changed annually.
- FHL grounds are well lit.

6.3 Building knowledge and capability

All residents and staff must complete education and training on prevention and responding to disclosures. This training must be delivered by or approved by the relevant higher education provider, which in our case is the University of Sydney.

Residents who are students at the University of Sydney are already required to undertake training provided by the University. FHL will promote and champion university provided training to all residents during FHL resident orientation. FHL will also actively promote and share prevention messages in its handbook, orientation and general announcements.

Our chaplains and senior residents are required to complete accredited [Creating Safe Spaces](#) training. This is a mandatory, state-wide program for all paid pastoral staff and volunteers working with vulnerable people. It equips them to create secure environments for children, youth and vulnerable adults, incorporating Royal Commission recommendations, Working with Children Checks and trauma-informed practices.

Senior Residents training focus will be peer-to-peer culture change, active allyship and referral. They will be expected to:

- recognise red flags and signs of gender-based violence
- act as active bystanders to safely intervene in peer groups
- provide a safe, trauma-informed first disclosure point
- clearly understand how to refer peers to professional support services without investigating.

This training will be provided as part of the formal Senior Resident training at the start of the year and reinforced during fortnightly mentoring sessions and/or weekly meetings.

Staff (chaplains and business finance manager) training focus will be compliance, procedural adherence, and navigating institutional boundaries when responding to disclosures. They will be expected to:

- understand FHL's reporting obligations and legal requirements
- safely receive disclosures and connect individuals to support systems
- understand boundary setting to avoid acting as a counselor or investigator
- support internal risk-management and compliance.

Our senior chaplains will build additional capability regarding gender-based violence (prevalence, risks, enablers and support) and share this knowledge with the secondary chaplain and senior residents. Where they lack the expertise to respond to incidents of serious sexual harm, the executive chaplain will facilitate swift access to external professional support services.

6.4 Providing safety and support for those who report gender-based violence

Residents and staff are encouraged to report any incident or concern that they believe breaches this policy. They may report a general issue or one that relates to sexual harm or gender-based violence that has happened to them or someone else. Reports will be able to be made via the Flo App which will access an encrypted web-based reporting and case management platform (Cognito Forms).

Reporting options:

- Make a disclosure – share what happened and access support without making a formal complaint.
- Make a formal report – request an investigation or specific action.
- Speak to someone confidentially – get advice about options.
- Report anonymously – we can take action to keep our community safe.

A disclosure is the provision of information about a person's experience of gender-based violence by the discloser or another person. It may be made anonymously or shared with anyone – a colleague, support staff, or peer. Getting support does not mean they have to make a report.

A formal report is information about an experience of gender-based violence submitted through official reporting channels and may trigger investigations or disciplinary action.

For disclosures, we must seek and consider the discloser's views before initiating an investigation. However, the Code states we are required to investigate all formal reports involving students or staff.

We are required to ensure procedural fairness for both disclosers and respondents.

7. What is gender-based violence and sexual harm and who does it impact?

7.1 Gender-based violence

When gender-based violence occurs, the impacts are profound. It undermines safety and trust, damages mental health, disrupts education and limits career and life opportunities.

Gender-based violence is 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, depravity of liberty or autonomy.

Violence is based on gender if it is perpetrated because of a person's gender or gender expression. It can happen in many ways. These include in person, through electronic communications or use of other technology. It is unlawful and strictly prohibited by FHL.

Gender-based violence is underpinned by power imbalances and gender inequality. It is driven by social and cultural factors such as:

- rigid gender roles and stereotypes
- unequal control over decision-making
- attitudes that condone violence based on gender
- peer relations that emphasise aggression and control.

This policy recognises that gender-based violence can happen to anyone. However, the nature and context of that violence differs across groups:

- Aboriginal and Torres Strait Islander Australians experience disproportionately high levels of all forms of gender-based violence.
- Women are most often subjected to violence from men they know (often a current or former partner), whereas men more commonly experience violence from men they do not know.
- Gender-diverse and other LGBTIQ+ people experience elevated rates of family, domestic, and sexual violence, as well as discrimination.
- People with a disability, particularly women and girls, experience violence, abuse and neglect at much higher rates, over longer periods and by more perpetrators.
- International students may face particular barriers to seeking support and achieving justice for sexual and intimate partner violence.
- Within a workplace or study environment, all genders experience sexual harassment, and all genders can perpetrate sexual harassment. However, most gender-based violence is perpetrated by men against women.

7.2 Sexual harm

Sexual harm means any sexual activity a person does not consent to. This includes:

- sexual harassment
- sexual assault
- non-consensual sexual touching
- non-consensual sexual acts
- voyeurism
- recording or distributing an intimate image without the subject's consent, regardless of whether the image is real or fake.

A person sexually harms another if the other person did not consent to the sexual activity and the first person:

- knew that the other did not consent
- was reckless as to whether they consented
- unreasonably believed that they consented.

A belief that another person has consented to sexual activity is unreasonable if the first person did not say or do anything to find out whether the other consented at the time. Threatening or attempting to engage in any of the conduct described above also constitutes sexual harm.

8. Whole-of-Organisation Gender-based Violence Prevention and Response Policy

The table below outlines the actions we will take to prevent and respond to gender-based violence across the whole organisation, in alignment with the Code. They are commensurate with the size and personnel scale of FHL.

8.1 Accountable leadership and governance

Action (meeting requirements under 7.2 and 7.3 of the Code)	Responsible	Timeline
A legally binding agreement (deed) between the University of Sydney and Flo Harris Lodge binds us to the requirements of the Code.	The FHL Committee chairman	1 January 2026 to 30 December 2027
The FHL committee endorses the FHL Gender-based violence prevention and response policy. It has been briefed on the implementation of the Code throughout 2026 and will continue to be briefed on the ongoing implementation of the policy.	The FHL Committee	Formal endorsement, committee meeting minutes 21 September 2026
The FHL Gender-based violence prevention and response policy is published on the FHL website.	FHL Executive Chaplain	By 30 September 2026
Responsibility for the implementation of the policy is formally designated to the Executive Chaplain of FHL.	The FHL Committee and the FHL Executive Chaplain	Committee meeting minutes 18 May 2026
The Executive chaplain will inform the FHL committee of all disclosures of sexual harm or gender-based violence, while protecting the confidentiality and well being of the declarant.	FHL Executive Chaplain	In the event of a disclosure
Student leaders will learn about their role in helping to prevent and respond to gender-based violence during the senior residents' training period.	FHL chaplains	Each January
We will report to the University of Sydney as per the Code requirements using the university's online reporting form. In meeting these requirements we are only required to provide de-identified data, ensuring that no individual can be identified. To ensure this we may need to remove a demographic characteristic in a small cohort.	FHL Executive Chaplain	In the event of a disclosure by a USYD student.

8.2 Environments are safe, and systems continuously improve to prevent and respond to gender-based violence

Action (meeting requirements under 7.4 of the Code)	Responsible	Timeline
All staff and chaplains must sign the GBV and Intimate relationships declaration forms.	FHL Executive Chaplain	May 2026 for existing staff and prerequisite of new staff engagement.
Employment contracts must be updated to include declaration requirements.	FHL Executive Chaplain	
Student contracts will be expanded to acknowledge the importance of preventing and responding to gender-based violence.	FHL Executive Chaplain	Contracts for 2027
During Flo orientation week, the chaplains and senior residents will set out and champion the respectful and safe behaviour required of all residents.	FHL chaplains and senior residents	Flo orientation week.
External locks and codes will be changed annually. Residents will be reminded to shut all external doors.	FHL business manager	Locks changed in January. Student reminders as needed.

8.3 Build knowledge and capability

Action (meeting requirements under 7.5 and 7.6 of the Code)	Responsible	Timeline
All staff and senior residents must complete and comply with the Baptist Union <i>Creating Safe Spaces</i> Training - including both on-line and face to face training.	FHL Committee and Executive Chaplain	Before the start of the accommodation year.
Staff (Chaplains and Business Finance Manager) are required to complete in-house prevention and person-centred and trauma-based response training which will be developed and delivered by one of the executive chaplains.	FHL Executive Chaplain	At the start of each academic year.
Training for senior residents will be expanded to include gender-based violence prevention and reporting, including taking a trauma informed and person-centred approach when responding to disclosures.	FHL chaplains	Training material to be completed before January 2027.
Residents will be strongly encouraged to complete and take seriously the training provided by their respective universities, including Respect@Sydney.	FHL chaplains	Flo Orientation week.
Reporting data must be reviewed annually. In the event of a disclosure, FHL will implement a system to safely collect and share gender-based violence data with the University of Sydney or other relevant universities.	FHL Executive Chaplain	Reporting data to be reviewed each December. No reporting required in the event of zero disclosures.
The chaplains should learn from any reported incidents of sexual harm or gender-based violence and make any necessary improvements to this policy.	FHL Executive Chaplain	Following any declaration of harm.
The chaplains should read and where appropriate respond to the findings and recommendations of the <i>National Student Safety Survey 2026</i> results.	FHL chaplains	The survey is due to be released in early 2027.

8.4 Responses and support services are timely, safe, appropriate and person-centred

Action (meeting requirements under 7.7 of the Code)	Responsible	Timeline
FHL must signal to its residents that it is committed to creating a culture that is safe, respectful and inclusive. And that it is committed, therefore, to the prevention of sexual harm and gender-based violence, and to supporting those who want to report it.	FHL chaplains and senior residents	Main signalling at the start of the year, during SR training, resident induction and floor meetings.
To provide accessible reporting channels, FHL will use an encrypted web-based reporting and case management platform (Cognito Forms) which can be easily accessed through the Flo App. Where the report involves a FHL chaplain, the report will be automatically directed to the chair of the FHL committee.	FHL Executive Chaplain	
FHL chaplains will develop and disseminate information about FHL response and support pathways. FHL chaplains and senior residents must ensure that response and support services are safe, person centred and trauma informed.	FHL chaplains	
The reporting pathway will provide both: - an informal and anonymous reporting pathway to respond to minor issues more rapidly without the need for a formal report - a formal reporting pathway to respond to sexual harm and gender-based violence.	FHL Executive Chaplain	
FHL chaplains must provide or facilitate access to support services to disclosers and respondents.	FHL chaplains	As required
Induction training for new students and staff must include details about raising complaints and seeking support. The student handbook will be expanded to describe sexual harm and gender-based violence response and support pathways.	FHL chaplains	At the start of the year, during senior resident training, resident induction and floor meetings. And on the FHL website.
Where a disclosure relates to behaviour occurring at FHL, the Executive Chaplain (or where relevant, the Chair of the FHL committee) must take all necessary action to manage risk, including facilitating urgent access to support services and relocating the respondent where required and procedurally fair.	FHL Executive Chaplain	

Action (meeting requirements under 7.7 of the Code)	Responsible	Timeline
A discloser will be given agency in deciding how to proceed. The process must be explained to them at first contact. They can choose: • if they want their university or FHL to lead the response to their disclosure • if they would like the support of the liaison person at the University of Sydney Safer Communities.	FHL Executive Chaplain	
Should the resident choose FHL to lead the response, the Executive chaplain must: • undertake a risk assessment within 48 hours and from this determine necessary safety measures and implement them immediately • manage and monitor the risk • if relevant, share necessary information with the student's university to protect the safety of others • implement support plans for both disclosers and respondents within 48 hours.	FHL Executive Chaplain	Within 48 hours of disclosure
The chaplains must create a procedure/flow chart/check list to identify flow of responsibility, including information sharing protocols with the University of Sydney or other relevant tertiary providers. For senior residents, include a prompt to escalate to chaplains immediately. Clear indication of when the 48 hour timeframe commences.	FHL Executive Chaplain	