

SCIENCE IN AUSTRALIA GENDER EQUITY (SAGE)

Submission on the Second Action Plan

National Plan to End Violence against Women and Children 2022–2032

Submission status

Draft for consultation

Date

July 2026

Primary priority area

Priority Area 5: System integration and workforce

Contact

[REDACTED]

Secondary priority area

Priority Area 2: Prevention and early intervention

SAGE@sciencegenderequity.org.au

About SAGE

Science in Australia Gender Equity (SAGE) is the national body advancing gender equity, diversity and inclusion in Australia's tertiary education and STEMM research sectors. Through the SAGE Athena Swan Accreditation Program, SAGE supports institutions to identify structural barriers, implement evidence-based actions, and assess outcomes and impact over time.

The SAGE Athena Swan Accreditation Program provides a practical proof of concept for sustained, accountable institutional change across tertiary education and research sectors. Its model requires senior leadership commitment, transparent and rigorous self-assessment, evidence-informed action planning, monitoring, evaluation, public reporting and continuous improvement. While gender-based violence prevention and response require specialist expertise and must be co-designed with specialist services and affected communities, the SAGE Athena Swan model demonstrates that tertiary education institutions can build structured, evidence-based and accountable capability over time.

SAGE also convenes a Gender-Based Violence Community of Practice, bringing together 65 members from 29 institutions across the tertiary education and research sector who are working across prevention, response, policy, student and staff support, education, governance and institutional change. This membership represents a significant sector asset: it provides an established mechanism for connecting practitioners who are often working in complex, sensitive and rapidly evolving roles, and for identifying common implementation challenges, capability gaps and promising practice across diverse institutional contexts. Through this Community of Practice, SAGE plays a distinctive sector role by creating a trusted forum for cross-institutional learning, shared problem-solving and knowledge translation, while helping to bridge institutional action with specialist gender-based violence expertise and national policy reform. Members of the Community of Practice were invited to provide feedback on this submission, and the feedback received has been incorporated into its development.

Executive summary

SAGE recommends that the Second Action Plan invest in sustainable specialist gender-based violence prevention and response capability across higher education. Targeted investment is needed to connect the higher education sector with the specialist domestic, family and sexual violence system and to help translate the National Higher Education Code to Prevent and Respond to Gender-based Violence 2025 (National Code) into effective prevention, safer responses and measurable institutional change. This investment should also strengthen universities' capacity to address the recognised gendered drivers of violence through education and curriculum, and to align institutional gender equality strategies and action plans with gender-based violence prevention.

SAGE's central argument is not that government assume providers' responsibility for regulatory compliance. Rather, the Second Action Plan should address a system-level capability gap by supporting models that build and sustain specialist expertise, particularly for smaller, regional and less well-resourced providers, and strengthen partnerships with community-based specialist services.

Summary of SAGE recommendations

1. **Invest in sustainable specialist capability across higher education** through dedicated roles, shared or consortium-based models, funded partnerships with specialist services, specialist supervision and longitudinal evaluation.
2. **Embed primary prevention in education and align gender equality planning** by supporting curriculum-based prevention, educator capability and stronger links between gender equity strategies and National Code prevention plans.
3. **Explicitly connect the Second Action Plan and the National Code** through formal coordination between social services, education and the higher education gender-based violence regulator, while drawing on existing sector capability.
4. **Define specialist and non-specialist workforce contributions** so institutional specialist roles lead strategy and quality assurance while staff have clear, role-appropriate expectations, referral pathways and access to expert advice.
5. **Require intersectional, culturally safe and community-informed approaches** that centre First Nations leadership and include affected communities through properly resourced co-design, implementation and evaluation.
6. **Evaluate outcomes and impact, not activity alone** through a common evaluation framework that measures capability, safety, cultural change, equitable outcomes and the effectiveness of workforce and partnership models.

Tertiary education should be visible in the Second Action Plan

The Consultation Paper recognises that prevention must be embedded where people live, work, learn and connect,¹ and that education is one of the systems people affected by violence may need to navigate. However, tertiary education is not addressed as a distinct institutional setting. This gap risks overlooking a sector that combines workplaces, learning environments, research settings, social communities and, often, residential accommodation.²

Tertiary education can shape attitudes, norms, professional practices and behaviours at scale. Through formal curricula, professional education, research training and broader student learning, universities can challenge the gendered drivers of violence—including condoning violence, rigid gender stereotypes, unequal power and decision-making, and cultures that reinforce dominant forms of masculinity. This is particularly important in disciplines whose graduates will influence workplaces, institutions and communities. Tertiary education providers also contain significant power differentials, including between supervisors and research students, senior and early-career staff, permanent and insecurely employed workers, and institutions and international students or staff whose study, employment or visa status may increase dependency.³ Prevention and response, therefore, require more than general awareness activity: they require specialist knowledge embedded in governance, workforce systems, education, risk management, support, complaints processes, data and evaluation.

The National Code creates an immediate opportunity

The National Code commenced for Table A and B providers on 1 January 2026 and will extend to other TEQSA-registered providers from 1 January 2027. It establishes enforceable whole-of-organisation requirements across accountable leadership, safe environments, workforce knowledge and capability, support, safe processes, data and impact, and student accommodation.⁴

The Code is a major national reform and a practical implementation mechanism for the Second Action Plan's objectives in higher education. In particular, its requirements for a Whole-of-Organisation Prevention and Response Plan, an outcomes framework, workforce capability and contribution to the national evidence base⁵ align closely with Priority Areas 2 and 5.

Regulation alone, however, does not create the specialist workforce needed to implement these requirements to a high and sustainable standard. Capability is unevenly distributed across the

¹ Australian Government Department of Social Services and Australia's National Research Organisation for Women's Safety (ANROWS), *Evidence to Action: Informing Direction for the Second Action Plan—Consultation Paper in Support of the National Plan to End Violence against Women and Children 2022–2032*, May 2026, pp. 45–46.

² Australian Government Department of Education, 'Gender-based violence and higher education', 29 January 2026.

³ Department of Education, 'Gender-based violence and higher education'.

⁴ Australian Government Department of Education, *National Higher Education Code to Prevent and Respond to Gender-based Violence 2025*, Standards 1–7, 2025.

⁵ Department of Education, *National Higher Education Code*, Standards 1, 3 and 6.

sector.⁶ Without sustained specialist expertise, providers may default to fragmented or compliance-led implementation focused on policies, training completion and reporting, rather than prevention, cultural change, safe practice and evidence of impact.⁷

SAGE Recommendations

Recommendation 1. Invest in sustainable specialist capability across higher education

The Second Action Plan should establish a targeted initiative to strengthen specialist gender-based violence prevention and response capability across higher education. The initiative should allow for models proportionate to provider size, location, existing capability and community context, including:

- dedicated specialist gender-based violence prevention and response positions, with priority support for smaller, regional and less well-resourced providers;
- co-funded or time-limited capability and implementation grants that build durable institutional capacity;
- shared specialist roles, regional consortia, or an expanded sector-wide capability model that builds on existing infrastructure and networks, including SAGE's Gender-Based Violence Community of Practice;
- funded partnerships and secondary-consultation arrangements between providers and community-based specialist services;
- access to specialist supervision, professional development and support addressing vicarious trauma; and
- funding for longitudinal evaluation and knowledge translation so effective models can be identified and scaled.⁸

New investment should build on and strengthen effective sector infrastructure rather than establish parallel or duplicative mechanisms. SAGE already convenes tertiary education and research practitioners working across gender-based violence prevention and response, providing an established foundation for cross-institutional learning, shared problem-solving and the identification of common capability needs. Subject to independent scoping, appropriate sector resourcing and co-design with government, specialist gender-based violence services, First Nations leadership, students, staff and affected communities, SAGE should continue the role as a sector convener and coordinator of institutional practitioners. This role would support knowledge translation, implementation learning and capability building, while preserving the distinct expertise and leadership of specialist gender-based violence services.

⁶ Rachel Bertram and Catharine Pruscino, 'From Compliance to Accountability: Strengthening Gender-Based Violence Evaluation Under the National Higher Education Code' (2026) 34(1) *Journal of the Australian and New Zealand Student Services Association* 76, 77–78, 81–82.

⁷ Bertram and Pruscino, 'From Compliance to Accountability', pp. 77–78, 85–87.

⁸ Department of Social Services and ANROWS, *Evidence to Action*, pp. 32 and 50–51.

Recommendation 2. Embed primary prevention in education and align gender equality planning

The Second Action Plan should support tertiary education providers to address the gendered drivers of violence through formal education and curriculum, rather than relying primarily on awareness campaigns or stand-alone training.⁹ This should include support for institutions to:

- embed evidence-informed gender-based violence prevention and respectful relationships education across relevant curricula, professional programs, research training and student leadership development;
- build the capability of educators to teach about gender, power, inequality, respectful relationships and the prevention of violence in ways that are discipline-relevant, intersectional and culturally safe;
- review curricula and learning environments for gender stereotypes, unequal participation, exclusionary cultures and professional norms that may reproduce the drivers of gender-based violence; and
- explicitly align institutional gender equity strategies and action plans with Whole-of-Organisation Prevention and Response Plans required under the National Code.

Alignment should be based on each institution's evidence about the drivers, risks and disproportionately affected cohorts within its own context. Gender equity and gender-based violence prevention should not operate as separate institutional agendas: actions addressing leadership, workplace culture, precarious employment, career progression, representation, pay equity and unequal power should be assessed for their contribution to preventing gender-based violence.

Peer-reviewed research supports prevention education that moves beyond one-off compliance training toward participatory, relational and institutionally supported approaches embedded in campus life.¹⁰ Broader evidence also shows that effective violence-prevention programs are more likely to be grounded in a clear theory of change, tailored to local context, sufficiently intensive, and designed to address multiple drivers of violence through interactive, co-designed and multi-level strategies.¹¹ For tertiary education, this reinforces the need for sustained, evidence-informed prevention education rather than isolated awareness-raising.

⁹ Gadow, Friederike, Hannah Robertson and Meredith Rossner, 'Peer-led Approaches to Gender-Based Violence Prevention Education in Higher Education: Insights from the Rights, Relationships and Respect Program' (2026) 34(1) *Journal of the Australian and New Zealand Student Services Association* 56–75.

¹⁰ Gadow, Friederike, Hannah Robertson and Meredith Rossner, 'Peer-led Approaches to Gender-Based Violence Prevention Education in Higher Education'.

¹¹ Stewart, Rebecca, Breanna Wright, Liam Smith, Steven Roberts and Natalie Russell, 'Gendered Stereotypes and Norms: A Systematic Review of Interventions Designed to Shift Attitudes and Behaviour' (2021) 7(4) *Heliyon* e06660.

Recommendation 3. Explicitly connect the Second Action Plan and the National Code

The Second Action Plan should recognise the National Code as part of the national prevention and response architecture. It should establish coordination between the Department of Social Services, the Department of Education and the Higher Education Gender-Based Violence Regulator to:

- map and draw on existing sector capability, networks and initiatives—including those convened by SAGE—to align investment, address identified gaps and avoid parallel or duplicative systems;
- connect providers with specialist prevention and response expertise;
- share implementation learning while respecting regulatory independence;
- use aggregated sector evidence safely to inform national policy and research priorities; and
- identify gaps affecting organisations outside the Code's direct coverage, including but not limited to research-based medical research institutes and publicly funded research agencies.

The coordination mechanism should be formalised through agreed terms of reference, a shared implementation workplan, data-sharing principles and a reporting pathway to the National Plan governance architecture. The Department of Social Services and the Department of Education should have clear joint responsibility for policy coordination, while the Higher Education Gender-Based Violence Regulator should participate in a way that supports sector-wide implementation learning without compromising regulatory independence.

Recommendation 4. Define the contribution of specialist and non-specialist workforces

Specialist institutional roles should lead strategy, capability building, quality assurance, service partnerships and evaluation. They should not displace specialist clinical or crisis services, nor make all institutional staff de facto specialist practitioners.

The Second Action Plan should support the co-development of nationally consistent, role-appropriate capability expectations, drawing on specialist gender-based violence expertise, institutional experience and existing sector networks. Capability development should be supported by clear referral and escalation pathways, access to specialist advice, and clarity about the limits of non-specialist roles.

Existing sector bodies, including SAGE, are already convening institutional practitioners and specialist services and should continue to translate nationally consistent capability expectations into role-appropriate guidance, resources and implementation support. With appropriate resourcing, SAGE's existing Gender-Based Violence Community of Practice could provide a mechanism for testing emerging approaches, sharing implementation learning and identifying common capability gaps across institutions.

Recommendation 5. Require intersectional, culturally safe and community-informed approaches

The design and evaluation of tertiary education capability initiatives should recognise that gender inequality intersects with racism, ableism, homophobia, transphobia, migration and visa status, employment insecurity and geographic isolation. These factors shape exposure to harm, confidence in reporting, risk of retaliation or career consequences, and access to safe support.¹²

13

First Nations leadership and self-determination must be central, consistent with Our Ways – Strong Ways – Our Voices.¹⁴ Initiatives should also be designed with people with disability, culturally and linguistically diverse and migrant and refugee communities, LGBTIQ+ communities, international students and staff, and people with lived experience. Dedicated resourcing is required for meaningful participation, rather than relying on unpaid consultation.

Implementation should also draw on existing sector expertise, including SAGE's experience supporting institutions to embed intersectional analysis in organisational data, action planning and evaluation via the SAGE Athena Swan program. This should complement, and never substitute for, the leadership and direct participation of First Nations peoples and other affected communities.

Recommendation 6. Evaluate outcomes and impact, not activity alone

Investment in prevention and response should be accompanied by a common evaluation framework that distinguishes implementation activity from outcomes and longer-term impact.¹⁵ Training delivery and policy publication are important outputs, but do not by themselves demonstrate increased safety or institutional change.

Evaluation should examine whether funded models contribute to:

- stronger organisational prevention capability and leadership accountability;
- more accessible, trusted, timely and culturally safe disclosure, support and reporting pathways;
- greater consistency and confidence among non-specialist staff without role overreach;
- effective coordination and referral between providers and specialist services;
- reduced tolerance of harmful attitudes and behaviours and safer institutional cultures;
- equitable outcomes across different cohorts, assessed through appropriately disaggregated quantitative and qualitative evidence;
- evidence-informed attention to the gendered drivers of violence within curricula, professional education and research training; and

¹² Department of Education, 'Gender-based violence and higher education'.

¹³ Laura Zark, John W Toumbourou and Lata Satyen, 'Help-Seeking for Intimate Partner and Family Violence Among Tertiary Students in Australia: Nature, Extent, and Cross-Cultural Differences' (2023) 38 *Journal of Family Violence* 491–508.

¹⁴ Australian Government, *Our Ways – Strong Ways – Our Voices: National Aboriginal and Torres Strait Islander Plan to End Family, Domestic and Sexual Violence 2026–2036*, Department of Social Services, February 2026.

¹⁵ Bertram and Pruscino, 'From Compliance to Accountability', pp. 80–87.

- stronger alignment between institutional gender equity plans, identified drivers of gender-based violence and National Code prevention actions.

The National Code's data and outcomes requirements provide an important foundation,¹⁶ but additional evaluation investment will be needed to understand which workforce and partnership models produce meaningful change and can be adapted across varied institutional contexts.

The common evaluation framework should be appropriately resourced and developed through an independently led co-design process involving the Department of Social Services, the Department of Education and the Higher Education Gender-Based Violence Regulator, ANROWS, AIHW, Universities Australia, SAGE, specialist gender-based violence services, First Nations leaders, students, staff and people with lived experience. The evaluation framework should complement, rather than duplicate, the National Code's data and outcomes requirements and the National Plan's Performance Measurement Plan. SAGE holds sector knowledge and convenes institutional practitioners and is well placed to support shared learning about what is working, for whom and under what conditions, while specialist services and affected communities should lead the definition of safe, meaningful and culturally appropriate outcomes.

Implementation architecture: roles, governance and outcomes

To support implementation, the Second Action Plan should translate the recommendations into a practical results framework aligned with the National Plan's Theory of Change, Outcomes Framework and Performance Measurement Plan. This would clarify accountabilities, support consistent implementation across the tertiary education sector and enable evaluation of outcomes and impact rather than activity alone.

Recommendation	Proposed lead and partners	Implementation mechanism	Indicative timeframe	Example indicators
1. Invest in sustainable specialist capability	Department of Social Services and Department of Education, with SAGE, Universities Australia, specialist services and providers	Targeted capability initiative with dedicated roles, shared roles or consortia, funded partnerships and specialist supervision	Design in 2026–27; phased implementation from 2027	Number and distribution of funded specialist roles; provider access to specialist advice; evidence of capability growth across provider types
2. Embed prevention in education and gender equality planning	Department of Education, providers, SAGE and curriculum leaders, with specialist prevention expertise	Guidance, implementation grants and communities of practice linking curricula, gender equality plans and National Code prevention plans	Guidance in 2026–27; implementation from 2027	Evidence of curriculum integration; alignment between gender equality strategies and Whole-of-Organisation Prevention and Response Plans

¹⁶ Department of Education, *National Higher Education Code*, Standards 1 and 6.

3. Connect the Second Action Plan and the National Code	Department of Social Services and Department of Education, with the Higher Education Gender-Based Violence Regulator	Formal inter-agency coordination mechanism with terms of reference, implementation workplan and reporting pathway	Establish in 2026–27; review annually	Published governance arrangements; identified implementation gaps; evidence that policy learning informs national priorities
4. Define specialist and non-specialist workforce contributions	Department of Education, specialist services, SAGE, providers, unions, student representatives and professional bodies	Co-designed role capability expectations, referral pathways and guidance on role limits	Co-design in 2026–27; implementation from 2027	Clear role expectations; improved staff confidence without role overreach; access to referral and escalation pathways
5. Require intersectional, culturally safe and community-informed approaches	First Nations leadership, affected communities, specialist services, providers, SAGE and government agencies	Funded co-design, participation and evaluation processes embedded in all capability initiatives	Required from program design stage	Funded participation mechanisms; evidence of community-informed design; disaggregated outcome measures
6. Evaluate outcomes and impact	Independently led evaluation consortium, with DSS, Education, the Regulator, ANROWS, AIHW, SAGE, providers and specialist services	Common evaluation framework aligned with the National Plan and complementary to National Code data and outcomes requirements	Framework design in 2026–27; baseline and longitudinal evaluation from 2027	Outcome and impact indicators; evidence of safer pathways, stronger capability, partnership quality, cultural change and equitable outcomes

Response to Priority Area 5 consultation questions

For tertiary education, the biggest contribution to a more coordinated system would be to build a sustainable interface between institutions and the specialist gender-based violence sector. This requires specialist institutional capability, funded partnership models, clear role definitions, secondary consultation, referral pathways, supervision and shared learning.¹⁷

The workforce gap is not addressed by training alone; it also requires specialist expertise, appropriate resourcing, integrated systems, leadership and opportunities for cross-institutional learning.¹⁸ Institutions need people with sufficient expertise, authority and continuity to embed prevention and response across organisational systems, guide non-specialist staff, maintain safe external partnerships and evaluate outcomes. The Second Action Plan should therefore prioritise investment in a flexible range of capability models and test their effectiveness across metropolitan, regional, large, small and specialist providers.

¹⁷ Department of Social Services and ANROWS, *Evidence to Action*, pp. 50–51.

¹⁸ Bertram and Pruscino, 'From Compliance to Accountability', pp. 86–88.

Conclusion

Tertiary education is a critical setting for prevention, early intervention and safe response. The National Code creates a strong regulatory foundation, but achieving its transformative intent will depend on sustained specialist expertise and connection to the broader gender-based violence system. A targeted tertiary education capability initiative would give practical effect to Priority Area 5, strengthen Priority Area 2, and help ensure that regulatory reform translates into measurable and equitable institutional change.

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