

Submission to the Second Action Plan on enhancing efforts to address gender-based violence in higher education

Written by [REDACTED]

Introduction

We welcome the opportunity to contribute to the consultation on the Second Action Plan of the [National Plan to End Violence against Women and Children 2022-2032](#) (National Plan). This submission has been prepared by [REDACTED], who are lived experience advocates, practitioners and researchers with expertise in the response to, and prevention of, gender-based violence in higher education settings. [REDACTED] are all advisors to the Government on the effective implementation of the [National Higher Education Code to Prevent and Respond to Gender-based Violence](#) (National Code) through the Specialist Advisory Panel to the Higher Education Gender-based Violence Regulator (the Regulator). Our bios with more information about our expertise related to this area of work is at the end of this submission.

Context and recent reforms

Higher education communities are settings where gender-based violence is prevalent, but where, until recently, structural and regulatory frameworks to address it have been slow, underfunded and inconsistently implemented. This submission provides recommendations that aim to further enhance these reforms to ensure they are implemented to their fullest extent and have the biggest impact.

Following the February 2024 adoption of the [Action Plan Addressing Gender-based Violence in Higher Education](#) (Action Plan) by Education Ministers, the 2024-25 Federal Budget committed \$18.7 million over four years from 2024-25, and an additional \$28.8 million from 2028-29 to 2034-35 to introduce the National Code. This investment included the establishment of a Gender-based Violence Regulator (GBV Regulator) within the Commonwealth Department of Education to regulate the implementation of the Code. Together, these groundbreaking reforms represent a significant and welcome step forward for the higher education sector, and for Australia's efforts to address gender-based violence more broadly.

However, the effectiveness of this investment has been undermined. Funds originally allocated to support the GBV Regulator and the implementation of the National Code have been reallocated to the Australian Tertiary Education Commission (ATEC) for purposes that are unrelated to addressing gender-based violence. As a result, the basic operational funding

implementation has been diminished, limiting the capacity of the GBV Regulator to uplift the sector and ensure student safety and wellbeing.

The Second Action Plan is an opportunity to correct this trajectory and continue the world-leading reforms that could serve as a model for other sectors across Australia. It is critical that the Australian Government commit to implementing these higher education reforms to its fullest extent as originally planned before embarking on using it as a model for other sectors. As lived experience advocates and experts who drove this reform and have been deeply involved in contributing to its design and implementation, we know that the GBV Regulator requires sufficient and dedicated funding to make this possible. Critically, this funding cannot be subjected to intra-departmental reallocation. Each of the GBV Regulator's responsibilities and initiatives must be reflected as line-by-line commitments in the federal budget to ensure accountability and sustainability.

Recommendations

We have four key recommendations:

1. Restore and continue funding the GBV Regulator
2. Fully implement Action 4 of the Action Plan on student accommodation
3. Develop a sector-wide accountability scorecard of providers against the National Code
4. Reform and reinvest in future iterations of the National Student Safety Survey.

Recommendation 1: Restore and continue funding the GBV Regulator

The Second Action Plan and future federal budgets must include explicit, line-by-line budget commitments for the GBV Regulator to fulfil its important mandate, and for each of the initiatives proposed in this submission, with clear lines of accountability, deliverables and timeframes.

The precedent set by the reallocation of funding intended for the GBV Regulator to ATEC for non-gender-based violence matters has meant that the GBV Regulator is unable to monitor and enforce compliance of the National Code as originally intended. This reallocation is deeply concerning and will impact the ability of the Unit to monitor implementation of the National Code and provide the sector with the guidance it needs to ensure meaningful change for students and staff who are impacted by gender-based violence in higher education communities.

Recommendation 2: Fully implement Action 4 of the Action Plan on Student Accommodation

The Second Action Plan should commit to the full implementation of Action 4 of the *Action Plan Addressing Gender-based Violence in Higher Education* which addresses student accommodation. This involves funding:

- a) the legislative reforms required to capture non-covered student accommodation settings, including purpose-built student accommodation operated by private providers within the National Code mandate, and

- b) the development of specific regulatory frameworks to hold these institutions accountable and to keep students safe

We know that student accommodation is a known area of heightened risk for sexual violence in higher education communities. Implementation of this recommendation to date has been incomplete, particularly in relation to independent and purpose-built student accommodation settings that fall outside the current scope of the National Code. As such, this commitment will require the Australian Government to report publicly on progress towards full implementation of this action.

Recommendation 3: Development of a sector-wide accountability scorecard

The Second Action Plan should commit to funding the development of a sector-wide accountability 'scorecard' system to assess actions by providers against key criteria of the National Code and publicly report on them. This must be led by the GBV Regulator so it is external to the higher education sector to ensure independence and be developed through co-design with victim-survivors, advocates and gender-based violence experts.

The monitoring and reporting of the higher education sector about the National Code is currently limited in scope, and the public and victim-survivors deserve public regular accountability monitoring of progress of each institution as to their genuine commitment and progress under the National Code.

Recommendation 4: Reform and Reinvestment in the National Student Safety Survey

The Second Action Plan should commit to reform and reinvest in future iterations of the National Student Safety Survey (NSSS). This involves funding:

- a) The transfer of responsibility for the NSSS from Universities Australia to the GBV Regulator in order to:
 - i) ensure independence and freedom from interference from the university sector
 - ii) enable appropriate resourcing
 - iii) ensure integration with the broader higher education regulatory framework under the National Code.
- b) A NSSS that would capture the full spectrum of gender-based violence, instead of focusing solely on sexual assault and harassment. This includes intimate partner violence, stalking, and technology-facilitated abuse, consistent with the definition of gender-based violence in the National Code.
- c) Alignment with the National Code, including survey methodology, definitions and reporting categories to enable consistent measurement and comparison of outcomes and areas for improvement.

- d) Genuine collaboration and engagement with victim-survivors, advocates and gender-based violence experts to advise on all phases of the survey. This would involve the survey being:
 - i) facilitated by gender-based violence experts who take a trauma-informed approach, and
 - ii) overseen by experts, student representatives, and those with lived experience in higher education settings.
- e) Expanding the NSSS to include Table B higher education providers, which currently falls outside the scope of the survey due to its administration by Universities Australia, creating a significant gap in data across the sector.

The NSSS is the primary mechanism for gathering data on student experiences of sexual harassment and assault in Australia's university communities. As individual members of advisory groups for the first and upcoming iterations of the NSSS, we are deeply concerned by the design and administration of the survey under the stewardship of Universities Australia, resulting in data that cannot be compared with previous versions of the NSSS or the Australian Human Rights Commission's Change the Course survey in 2017.

Broader applicability across other education settings and potentially across other sectors

The frameworks, tools and reforms in the National Code and proposed in this submission have the potential to provide similar reforms beyond the higher education sector. We encourage the Second Action Plan to consider how similar mechanisms might be adapted for:

- Australian Skills Quality Authority regulated education providers, such as TAFEs and other vocational education settings where students face similar risks but have even less access to formal support and reporting or complaints mechanisms like the National Student Ombudsman.
- Secondary education settings, where most students are minors and the power imbalance between institutions and students is even more pronounced.

We note that the National Plan's ambition to end violence against women and children requires a whole-of-education-sector approach, but right now, vocational and secondary education settings are being left behind. The Second Action Plan, using the higher education sector and the National Code as a guiding framework, is an opportunity to address the gaps.

Conclusion

Education communities are settings where gender-based violence can, and does, cause profound harm. Students deserve institutions where they can be genuinely safe while they learn, and a regulatory environment that holds providers to account when they fail to ensure that safety. The Second Action Plan is an opportunity to build on the foundations of the National Code and deliver real and measurable progress, but this will only occur if it is backed by

protected and sustained funding and a genuine commitment to implementation. We urge the Australian Government to treat these recommendations as essential conditions for addressing violence against women. We welcome the opportunity to discuss these recommendations further and to contribute to the design of any education-related initiatives that arise from the consultation process.

About the authors

██████████ is an anti-violence advocate and student services professional, specialising in gender-based violence response. ██████████ founded End Rape on Campus Australia, a registered charity that provided support to more than 300 students who had been impacted by gender-based violence in Australia's higher education sector. ██████████ was also previously the Director of Student Health and Safety at the Institute for Study Abroad, ensuring the wellbeing of international students across countries. ██████████ has been appointed to the Commonwealth Department of Education's Gender-based Violence Stakeholder Reference Group, the Expert Reference Group on the National Higher Education Code to Prevent and Respond to Gender-based Violence, and the Gender-based Violence Specialist Advisory Panel. She has provided independent consulting services on gender-based violence response, including trauma-informed and person-centred policy and system reform, to leading universities and organisations across Australia.

██████████ is a PhD candidate and gender-based violence advocate with expertise in gender-based violence prevention and response in university settings, student co-design, and relational approaches to gender-based violence prevention and response. Her PhD seeks to establish a 'menu of options' that universities should offer to victim-survivors of gender-based violence that are responsive to victim-survivor justice interests. She is also the co-founder of connect2prevent, a peer-led sexual violence prevention initiative and serves on a number of national advisory panels providing advice on gender-based violence initiatives including in implementation of the National Higher Education Code to Prevent and Respond to Gender-based Violence. Previously, ██████████ served as UNSW's Women's Officer and SRC President, and has seen firsthand the power of student engagement and activation to make true change on campuses.

██████████ is an activist, social worker, sexual violence prevention practitioner and PhD Candidate. ██████████ founded The STOP Campaign, a grassroots organisation addressing sexual violence at Australian universities, and holds a Churchill Fellowship exploring prevention strategies in Canada, the USA and the UK. ██████████ has worked across government, university and non-profit sectors in gender-based violence prevention and response, with expertise in policy reform, resource development, prevention education and co-design with people with lived experience. She helped secure the Action Plan Addressing Gender-based Violence in Higher Education and has since advised on the design and implementation of the National Student Ombudsman and National Higher Education Code to Prevent and Respond to Gender-based Violence. She is currently a PhD Candidate researching how constructions of shame can inform

sexual violence primary prevention. [REDACTED] has also contributed to several research projects and advocacy campaigns on sexual violence and child-on-child sexual abuse as a lived experience expert, with a particular focus on primary prevention and mental health system reform.

Reference List

Deloitte Access Economics (2025) *Cost benefit analysis of the proposed National Higher Education Code to Prevent and Respond to Gender-Based Violence*. Sydney, NSW: Deloitte.

Department of Education (2024) *Action Plan Addressing Gender-based Violence in Higher Education*. Canberra: Department of Education, p. 22. Available at: <https://www.education.gov.au/action-plan-addressing-genderbased-violence-higher-education/re-sources/action-plan-addressing-genderbased-violence-higher-education> (Accessed: July 19, 2024).

Department of Education (2025) *National Higher Education Code to Prevent and Respond to Gender-based Violence 2025*. Available at: <https://www.legislation.gov.au/F2025L01251/asmade> (Accessed: February 26, 2026).

Henry, A. (2023) *Regulatory responses to addressing and preventing sexual assault and harassment in Australian university settings*. Thesis. UNSW Sydney. Available at: <https://doi.org/10.26190/unsworks/24894>.

Schloeffel, C. (2023) *Combative to Collaborative: International perspectives on preventing sexual violence at Australian universities*. Churchill Fellowship report. Canberra: Winston Churchill Trust.

Students for Consent Culture (2022) *Scorecards, Students for Consent Culture*. Available at: <https://www.sfcccanada.org/scorecards> (Accessed: July 31, 2026).