

WHOLE-OF-ORGANISATION GENDER-BASED VIOLENCE PREVENTION AND RESPONSE PLAN AND FRAMEWORK





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Version	Date	Description of Change	Compiled	Authorised
1	31/07/2026	Initial Issue	General Manager - Community and Partnerships	Chief Operating Officer and Director



Introduction

Statement of Commitment

Journal Student Living (Journal) offers students from around the world an inspiring place to live and learn. We design, create, and manage premium student living spaces where students can connect, thrive, and excel academically. Our passion lies in providing an exceptional curated experience, fostering a supportive community, and ensuring the high standards in accommodation and service.

The safety and wellbeing of our residents is our highest priority. Creating and maintaining a safe, respectful and inclusive environment for all members of our community is central to what we do. There is no place for gender-based violence at Journal – or anywhere.

Our Whole-of-Organisation Prevention and Response Plan demonstrates how we meet requirements of the National Higher Education Code to Prevent and Respond to Gender-based Violence 2025. It sets out a unified, organisation-wide approach that establishes clear expectations, outlines key responsibilities, and places the safety and wellbeing of our resident students and staff at the center of our work. The Plan commits us to strong leadership and accountability, transparent reporting, inclusive consultation, effective support and continuous improvement.

We will always actively work to prevent gender-based violence across our organisation, and our students and staff affected by gender-based violence will receive the same, high-quality support regardless of where they live and work.

About This Plan

Journal recognises that gender-based violence is a significant and urgent issue that must be addressed. This violence is most commonly perpetrated by men against women and LGBTIQ+ people. We also recognise that other forms of discrimination – such as racism, ableism, homophobia and transphobia – intersect with gender inequality to influence a person's experience of violence. This results in groups of people – First Nations women, women with a disability, women from racially and marginalised backgrounds and LGBTIQ+ people – experiencing violence at higher rates, and often more severely.



Journal's residents are largely international students. Some of these students may come from cultural backgrounds where expectations around gender, diversity and inclusion differ from those held in Australia.

In consulting with our residents and staff as this Plan was developed, several key themes emerged. First, there is a strong appetite to learn more about gender-based violence and how to identify if someone may be experiencing it or at risk of experiencing it. Second, several students indicated that providing essential safety-related information in languages other than English may be helpful in breaking down barriers to help-seeking.

About Journal

Journal pride itself on creating, designing and managing purpose-built, accommodation where students can connect, feel inspired and excel academically.

Journal is passionate about helping students take on the challenge of living in a new city and studying in a new place. Our accommodation buildings are specifically designed to encourage communities to flourish, enabled by spacious common areas, on-site management and the delivery of our unique residential life program, Journal Life. Journal Life is focused on creating student engagement and promoting well-being and self-growth with experiential and enriching programs. Journal also strongly values students' wellbeing, prioritising safety through features such as controlled access, 24/7 security and on-site staff.

We maintain formal agreements and affiliations with higher education institutions, while also accommodating students from a wide range of tertiary education providers. We are committed to the safety of our community regardless of where they may study, and we welcome the introduction of the National Higher Education Code to Prevent and Respond to Gender-based Violence (the National Code).

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Size and Geography

Journal currently has one operational property – Campus House in Melbourne, providing 452 beds. Journal has another property in Melbourne and one in Brisbane, both of which will be operational in 2027. Journal is developing other properties in NSW and South Australia. In total, Journal's current portfolio pipeline is approximately 4,500 beds.

Staff and student demographics

Residents include a diverse mix of foundation year, undergraduate and postgraduate students from varied cultural, linguistic and socio-economic backgrounds, including students living away from home for the first time. Journal employs professional staff across operations management, community engagement and wellbeing, and risk management, ensuring a holistic approach to student experience and safety.

Scope of the Plan

This section outlines Journal's commitment to preventing and responding to gender-based violence, outlining the work already taken and the further work to come.

The Plan applies to:

- All members of Journal's community, including residents, operational and head office staff
- Engaged contractors
- Entities that conduct activities on behalf of Journal
- Other business and organisations that operate on, use or lease our facilities
- Entities that conduct activities outside of Journal-managed environments with substantial connection to Journal relationships, responsibilities, activities or the safety and wellbeing of the Journal community

Planning, Engagement and Evidence

Journal's Whole of Organisation Plan was developed in collaboration with Equality Partners and has been informed by organisational stakeholders at many levels, including staff, students, and university partners. This consultation was coordinated by Journal senior leadership.

Experience and Approach to GBV Prevention and Response

Journal has established a comprehensive range of measures to promote the safety, wellbeing and inclusion of our residents and staff. This includes clear safety procedures, preventative wellbeing initiatives and ongoing staff training to strengthen our capacity to identify, prevent and respond to incidents of harm.

We work closely with universities, sector partners and specialist organisations to ensure our practices reflect current evidence and best practice and align with the expectations of the National Higher Education Code to Prevent and Respond to Gender-based Violence. These partnerships support the ongoing review and strengthening of our prevention, response, risk management and support frameworks.

Where a disclosure is made, Journal facilitates a trauma-informed, person-centred response focused on immediate safety and support. Appropriate safety measures are implemented following disclosure, with a risk assessment undertaken within 48 hours and an individualised safety plan developed where required.

Support is available to both the person making the disclosure and the respondent, with options for a university-led or Journal-led response depending on the circumstances and preferences of those involved. Residents can also access referrals to appropriately qualified, trauma-informed counselling and specialist support services.

Training and Development

Journal recognises that Gender-Based Violence (GBV) is underpinned by factors including power imbalances, gender inequality, harmful gender norms, cultural attitudes and behaviours, and a lack of accountability. We also recognise the specific contextual factors that may influence the risk of GBV within student accommodation, including:

- The proximity and shared nature of residential living arrangements.
- Young people living independently, potentially for the first time, and navigating new social environments.
- The cultural and social diversity of our resident community, including international residents and those from culturally and linguistically diverse backgrounds. These residents may experience additional barriers to reporting, cultural differences in understanding or discussing GBV, concerns about visa implications, or fears regarding family or community perceptions.
- The vulnerabilities experienced by some residents, including residents under 18 and those who may require additional support or reasonable adjustments.

Journal addresses these contextual factors through a prevention-focused and inclusive approach that:

- Promotes respectful interactions, healthy relationships and inclusive behaviours through education, positive role modelling and clearly communicated community standards.
- Engages residents and staff in the development and review of our approach through consultation and feedback mechanisms, including opportunities for anonymous feedback.
- Works with subject matter experts and specialist organisations to ensure our prevention, response and support approaches are culturally safe, accessible and informed by best practice.

Journal has implemented a range of initiatives to strengthen the knowledge, confidence and capability of our community to prevent and respond to GBV, including:

- Mandatory GBV training for all operational staff, supported by annual refresher training.
- Responding to Disclosures training for frontline and resident-facing staff.
- Risk assessment and management training for operational managers.
- A compulsory GBV education module for all residents prior to commencing their stay at Journal, with annual refreshers for continuing residents.
- Ongoing education and awareness campaigns delivered through resident communications, email and visual displays throughout our facilities.
- Human Resources policies and procedures aligned with the requirements and expectations of the National Higher Education Code to Prevent and Respond to Gender-based Violence.

Monitoring, Evaluation and Continuous Improvement

Journal is committed to regularly monitoring and evaluating the effectiveness of its GBV prevention and response approach. Clear reporting processes, defined governance responsibilities and ongoing review ensure that emerging risks, trends and opportunities for improvement are identified and addressed. Data, feedback and performance insights are used to strengthen our policies, processes and support frameworks and ensure our approach remains effective, accountable and aligned with best practice.

Data and Reporting

- Prompt and accurate recording of incidents within relevant incident management systems.
- Regular monitoring and analysis of trends, incidents and response performance.
- Annual reporting to university partners to support transparency, accountability and continuous improvement.

Governance

- The General Manager – Community & Partnerships is responsible for oversight of Journal's GBV prevention and response framework.
- General/Assistant General Managers and Student Life Managers are responsible for implementation, monitoring and performance at facility level.

Continuous Review

- The GBV Prevention and Response Plan and supporting documentation are maintained by the General Manager – Community & Partnerships.
- Ongoing review is supported by the Head of Operations and Head of Finance and Corporate Services to ensure the framework remains current, effective and aligned with organisational and sector requirements.



Responses to Disclosures and Formal Reports

Disclosures can be made by victim-survivors and third parties directly to Journal or their university partner with an option to remain anonymous. A risk assessment will be undertaken in response to all disclosures within 48 hours of receiving the disclosure.

Disclosures can be made in-person or online via a secure webform. All disclosures are captured and managed in Donesafe, an incident management system providing secure, accessible, and mobile-friendly reporting mechanisms. Information is shared with university partners annually, or as requested.

Donesafe is administered by the Head of Operations and General Manager – Community & Partnerships. Actions can be assigned to facility staff members as appropriate.

Policies and Code of Conduct

Journal's approach to the prevention and response to Gender-Based Violence (GBV) is underpinned by a framework of policies, procedures and codes of conduct that clearly establish behavioural expectations and responsibilities. These frameworks are integrated with broader policies governing resident and staff conduct, workplace behaviour, complaints management and organisational safety, supporting a consistent whole-of-organisation approach that prioritises the safety, wellbeing and support of residents and staff.

- Journal Student Living Whole-of-Organisation Plan
- Journal Student Living Whole-of-Organisation Assessment
- Gender-based Violence Policy
- SOP Gender-based Violence Prevention and Response Procedure
- SOP Gender-based Violence First Responder Guideline
- SOP Gender-based Violence Risk Assessment Procedure
- Journal Staff Code of Conduct
- Journal House Rules

Approach to Ongoing Monitoring, Evaluation and Continuous Improvement Plan

Journal uses data, reporting and performance insights to support continuous improvement and strengthen organisational accountability. Trends, emerging issues and performance measures inform decision-making, guide the ongoing refinement of prevention and response strategies, and help ensure Journal's practices remain evidence-based, compliant and responsive to the evolving needs of our communities.



Whole of Organisation Action Plan

This Action Plan sets out the specific, time-bound actions Journal Student Living will take to address the identified risks, barriers and enablers, and to meet the requirements of Standard 7 of the National Code. The actions below align with the relevant requirements of Standard 7 and include cross-references to the broader National Code principles where applicable.

Actions taken to date:

7.2 Accountable leadership and governance

- Published its Whole-of-Organisation Prevention and Response Plan
- Not used non-disclosure agreements (NDAs) or non-disparagement clauses (NDCs)

7.4 Safe environments and systems

- All staff and contractors are required to hold valid Working With Children Checks
- Implementation of staff screening procedures for allegations of gender-based violence for staff

7.5 Knowledge and capability

- Providing biannual scenario-based training for staff on responding to critical incidents and de-escalation techniques
- Engaged Code Black to develop risk assessment templates and facilitate training for senior managers

7.7 Safety and Support

- Continuing relationships with all providers whose students we house to facilitate access to support
- Engaged Code Black to develop risk assessment templates and facilitate training for senior managers
- Development of new policies and procedures to support managing risk following a disclosure

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Number	Action	Responsibility	Timeframe	Code Reference
1	Education and training • Build the knowledge, confidence and capability of all operational and frontline staff through comprehensive, trauma-informed training, ensuring they can identify, prevent and respond to Gender-Based Violence (GBV) safely and effectively. • Deliver digital learning modules and targeted communication campaigns for residents to promote Respect at Journal • Deliver targeted communication campaign for residents, staff and contractors in how to utilise Journal's reporting platform via Donesafe • Provide advanced training for managers and wellbeing staff, covering GBV risk management, cultural safety, trauma-informed practice and appropriate referral pathways	General Manager - Community and Partnerships	Q3	7.4, 7.5, 7.7, 7.8
2	Monitoring and measurement plan	General Manager – Community and Partnerships	Q3	7.3

Number	Action	Responsibility	Timeframe	Code Reference
3	Review of Journal policies and procedures	General Manager – Community and Partnerships Head of Finance and Corporate Services	Q4	7.3
4	Investigating the use of translation software for key policy documents and to support disclosures	General Manager – Technology & Systems	Q4	7.4c
5	Establishment of a reference group to guide review and improvement of education and training program	General Manager – Community and Partnerships	Q4	7.5
6	Creating external partnerships with local crisis support services	General Manager – Community and Partnerships	Q3	7.7a-c
7	Establish formal information-sharing protocols with higher education providers for managing disclosures	General Manager – Community and Partnerships	Q3	7eiii
8	Develop uniform standards and provide further training to staff on how to record incidents	General Manager – Community and Partnerships	Q4	7.8