

WELLBEING AND SAFETY

Policy and Procedure

CGSI-WHS-POL-002 | Version 1.4

CG Spectrum Institute Pty Ltd

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1.0 Purpose

CG Spectrum Institute (CGSI) is committed to a learning and working environment that is safe for study and work. Behaviour that makes that environment unsafe is unacceptable. Any member of the CGSI Community found to have engaged in, contributed to, or condoned unsafe behaviour may be subject to disciplinary action.

Gender-based Violence is unacceptable at CGSI. It is never the responsibility or fault of the person who experiences it. CGSI takes a Whole-of-Organisation approach to preventing and responding to Gender-based Violence and racism, and its responses, practices and support services are safe, Person-centred and consistent with a Trauma-informed approach.

This policy and procedure gives effect to CGSI's obligations under:

- the National Higher Education Code to Prevent and Respond to Gender-based Violence 2025, made under the Universities Accord (National Higher Education Code to Prevent and Respond to Gender-based Violence) Act 2025 (Cth), which commences for CGSI on 1 January 2027;
- the Higher Education Standards Framework (Threshold Standards) 2021, in particular Standard 2.3 Wellbeing and Safety;
- the Higher Education Standards Framework Amendment (Threshold Standards) Instrument 2026, which introduces requirements to address racism and to create culturally safe environments and commences 1 January 2027;
- the Racial Discrimination Act 1975 (Cth);
- the positive duty under section 47C of the Sex Discrimination Act 1984 (Cth) and the equivalent positive duty under the Equal Opportunity Act 2010 (Vic), neither of which is subject to an employee threshold;
- CGSI's duties as a person conducting a business or undertaking under work health and safety law, including duties in relation to psychosocial hazards; and
- the Privacy Act 1988 (Cth) and the Australian Privacy Principles.

Where any provision of this document is inconsistent with the National Code, the National Code prevails.

1.1 Commencement and effect

This policy and procedure takes effect on 26 August 2026, on approval by the Governing Body, and replaces version 1.2.

The requirements set out in this document apply from that date. They are not deferred to 1 January 2027.

Two instruments impose requirements addressed by this document from 1 January 2027. The first is the National Higher Education Code to Prevent and Respond to Gender-based Violence 2025. CGSI is not a Table A or Table B provider under the Higher Education Support Act 2003 (Cth), so the earlier commencement date of 1 January 2026 does not apply to it.

The second is the Higher Education Standards Framework Amendment (Threshold Standards) Instrument 2026, which introduces requirements to address racism and to create culturally safe environments, and which applies to all registered higher education providers from that date. CGSI adopts the requirements of both instruments ahead of the dates on which it is obliged to.

CGSI's obligations in relation to wellbeing and safety under the Higher Education Standards Framework (Threshold Standards) 2021, the positive duty under section 47C of the Sex Discrimination Act 1984 (Cth) and the equivalent duty under the Equal Opportunity Act 2010 (Vic), the Racial Discrimination Act 1975 (Cth), and work health and safety law, are current obligations. They are not affected by either commencement date.

Where a date in this document is fixed by either instrument, including the reporting dates at clause 5.17, it is stated as it falls.

2.0 Scope and Application

This policy and procedure applies to:

- all current, prospective and former Students of CGSI;
- all Staff, which has the same meaning as worker under the Model Work Health and Safety Act and therefore includes employees, mentors, teaching assistants, contractors and their employees, labour hire workers, and volunteers, whether paid or unpaid;
- Leadership, being the Higher Education Principal Executive Officer and the Governing Body, and members of the Academic Board and other CGSI committees;
- Affiliated Organisations; and
- entities that conduct activities on behalf of CGSI, including businesses and organisations that operate on, use or lease CGSI's facilities, and third parties whose facilities Students or Staff use for work integrated learning, placements or practicums.

It applies across every setting in which CGSI operates, including online delivery, one-to-one mentor sessions, Slack and other digital channels, and on-site and hybrid delivery at the GameChanger Academy in Melbourne.

2.2 Conduct outside CGSI settings

CGSI will take proportionate and safe action in response to Gender-based Violence experienced or engaged in by its Students or Staff regardless of where, or the context in which it occurs. This includes conduct occurring on a work integrated learning placement, at an industry event, online, or in a private setting. Where a Formal Report has no connection to CGSI other than the status of the Respondent as a Student or Staff member, CGSI will consider the safety and wellbeing of Students and Staff in determining the scope of any investigation.

2.3 CGSI's context

CGSI is a small, non-university higher education provider. It delivers online, with hybrid delivery from the GameChanger Academy in Melbourne. It does not operate a campus and does not have a residential community. Its teaching workforce is a distributed network of industry mentors rather than a resident academic faculty.

The National Code contains no exemption or reduced standard for a provider of CGSI's size. Its requirements apply to CGSI in full. Where the Higher Education Standards Framework applies, which is principles-based and allows for contextual interpretation across different types of provider, this policy is implemented in a manner proportional to CGSI's size, delivery model and resources. Proportionality affects how CGSI meets a requirement. It does not reduce the requirement.

2.4 Student accommodation

CGSI does not own, operate, manage or arrange Student Accommodation, and Standard 7 of the National Code does not currently apply to it. Homestay arrangements, private residential tenancies and hotels used for temporary accommodation are excluded from the National Code definition of Student Accommodation. If CGSI's delivery model changes so that it owns, operates, manages, controls or is affiliated with student accommodation, this policy and the Whole-of-Organisation Gender-based Violence Prevention and Response Plan must be revised before that accommodation is offered to Students.

3.0 Definitions

Racism and its forms, and cultural safety, are defined at section 3.0 of the Diversity, Equity and Inclusion Policy, CGSI-ACA-POL-013, and are not restated here.

Terms marked [NC] are defined in the National Higher Education Code to Prevent and Respond to Gender-based Violence 2025 and are reproduced in this document without amendment. Where any definition in this or any other CGSI document is inconsistent with a definition marked [NC], the National Code definition prevails.

Term	Definition
Accredited Specialist [NC]	A psychologist, social worker or counsellor registered or accredited with their relevant industry body, who has undertaken formal training in supporting people affected by Gender-based Violence including Trauma-informed practice, and training to build competency in working with specific cohorts including First Nations people, culturally and linguistically diverse communities, people with disability and people of diverse sexual orientation and gender identity.
Affiliated Organisation [NC]	An organisation that uses CGSI's intellectual property in its name, marketing, recruitment or governance documents.

Term	Definition
Bullying	Repeated and unreasonable behaviour directed towards a person or group of people that creates a risk to health and safety. Repeated behaviour occurs more than once and may involve a range of behaviours over time. Unreasonable behaviour is behaviour that a reasonable person, having regard to the circumstances, would see as unreasonable, including behaviour that is victimising, humiliating, intimidating or threatening. A single incident, low-level interpersonal conflict, and reasonable management direction do not constitute bullying, although a single incident may still breach this or another CGSI policy.
CGSI Community	Members of the Governing Body, the Academic Board and other CGSI committees, Staff and Students, and those who use CGSI facilities including online facilities for work, study or social activity, or other authorised activity.
Consent	The free and voluntary agreement, by a person with the cognitive capacity to do so, to participate in an activity which may include an intimate or sexual relationship. Consent is not freely and voluntarily given if the person is coerced, unconscious or asleep, affected by drugs or alcohol, under threat or intimidation, in fear of bodily harm, subject to the exercise of authority, acting under false or fraudulent representations about the nature or purpose of the act, or mistaken about the identity of the other person. Consent can be given and subsequently withdrawn at any point.
Demographic Data [NC]	A person's sex, gender identity, sexual orientation, year of birth, race or ethnicity, religion, country of birth, languages used at home, requirement for an interpreter, Indigenous status and disability status.
Discloser [NC]	A person who has shared information about their experience of Gender-based Violence.
Disclosure [NC]	The provision of information about a person's experience of Gender-based Violence to CGSI by the Discloser or another person.
Discrimination	Treating someone unfairly because of a characteristic they have, or are assumed to have, that is protected by Commonwealth, State or Territory law, including disability, sex, pregnancy, race, age, marital or domestic status, sexual orientation, gender identity, and carer's responsibilities. Lawful exemptions and genuine equal opportunity or affirmative action measures do not constitute unlawful discrimination.
Formal Report [NC]	The provision, through formal reporting channels, of information about their experience of Gender-based Violence by a Discloser to CGSI, which requires CGSI to consider taking steps beyond the offer

Term	Definition
	and provision of support services, including without limitation the commencement of an investigation or a disciplinary process in appropriate circumstances.
Gender-based Violence [NC]	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 or deprivation of liberty or autonomy. For the avoidance of doubt, and without narrowing that definition, Gender-based Violence includes sexual assault, sexual harassment, sexual misconduct, coercive control, reproductive coercion, financial abuse, stalking, image-based abuse, and conduct occurring online or through digital technology. It applies regardless of where, or the context in which, it occurs.
Harassment	Occurs when a person or group is intimidated, insulted or humiliated because of one or more characteristics, or studies or works in a hostile or intimidating environment that a reasonable person would find offensive, humiliating or intimidating. It can arise from a single incident or from repeated incidents.
Hazing	Any action or situation, with or without the consent of the participants, that recklessly, intentionally or unintentionally endangers the mental, physical or academic health or safety of Staff or Students, including rituals and challenges used to initiate a person into a group.
Higher Education Principal Executive Officer	The person who has executive responsibility for the operation of CGSI, within the meaning of the Ombudsman Act 1976 (Cth). At CGSI this is the Chief Executive Officer.
Leadership [NC]	The Higher Education Principal Executive Officer and the Governing Body.
Non-disclosure Agreement [NC]	An agreement, including a deed of release or settlement agreement, that requires particular details to be kept confidential as part of reaching a settlement.
Person-centred [NC]	Ensuring that the Discloser's needs and preferences are at the centre of decisions made in response to the Disclosure. The response systems, policies and procedures affirm the Discloser's dignity and support their healing by genuinely considering their wishes and the impact that decisions may have on them, while at all times ensuring the safety and wellbeing of the Discloser and other Students and Staff.
Precautionary measures	Reasonable and proportionate measures directed at a person alleged to have engaged in an offence or a breach of discipline, undertaken at an early stage pending the outcome of proceedings,

Term	Definition
	to ensure a proper investigation can be carried out and to protect the wellbeing of those involved. They may include altered supervision or mentoring arrangements, restricted contact, reassignment of work, or suspension.
Procedural Fairness [NC]	In a decision-making context, means the decision is made in accordance with the rule against bias and the hearing rule, so that a Respondent is given an opportunity to present their case with knowledge of any prejudicial material that may be taken into account by the decision-maker. Also known as natural justice.
Racism, and cultural safety	Racism, racial discrimination, racial harassment, racial vilification, antisemitism, Islamophobia, racism towards Aboriginal and Torres Strait Islander peoples, institutional and systemic racism, cultural safety and culturally safe environment are defined at section 3.0 of the Diversity, Equity and Inclusion Policy, CGSI-ACA-POL-013. That policy is the single source for those terms, and they are applied in accordance with clause 6.2 of it.
Respondent [NC]	A person whom it is alleged has engaged in conduct that amounts to Gender-based Violence. In a matter that does not involve Gender-based Violence, Respondent means a person against whom a complaint is made.
Sexual assault	Any unwanted or forced sexual act or behaviour without consent, including unwanted sexual touching or contact, being forced to commit or to witness an act of gross indecency, and rape, which is the most serious form of sexual assault.
Sexual harassment	An unwelcome sexual advance, unwelcome request for sexual favours, or unwelcome sexual conduct, gestures, jokes or comments intended to offend, humiliate or intimidate, or where it is reasonable to expect the person might feel that way. It includes unwanted sexual attention through digital and online means, image-based abuse, and pressuring a person to engage in sexual behaviour for an educational or employment benefit.
Sexual misconduct	Instances of sexual harassment or sexual assault that CGSI is notified of or is responding to. If substantiated, sexual misconduct is a breach of this policy and of the Codes of Conduct that apply to Staff and Students.
Staff [NC]	Has the same meaning as worker under the Model Work Health and Safety Act. Staff therefore includes employees, mentors, teaching assistants, contractors and subcontractors and their employees, labour hire workers, outworkers, apprentices and trainees, work experience students, and volunteers, whether paid or unpaid.

Term	Definition
Student [NC]	A person enrolled as a student with CGSI, or undertaking a course of study or a unit of study with CGSI, including non-award study, enabling or bridging courses and foundation programs. For the purposes of this policy it also includes prospective and former Students.
Support person	A person who assists, accompanies and supports a Discloser, Respondent or interviewee in a matter under this policy. A Support person may be a friend, family member, Staff member or other nominated person.
Trauma-informed [NC]	An approach that applies the core principles of safety, being physical, psychological and emotional safety, trust, choice, collaboration and empowerment. It should minimise the risk of re-traumatisation and promote recovery and healing to the greatest extent possible.
Victimisation	Mistreating a person because they have made, or propose to make, a Disclosure, Formal Report or complaint, because they have provided information or evidence, because they have supported another person to do so, or because they have participated in a process under this policy.
Vilification	A public act that could incite hatred against, serious contempt for, or ridicule of, a person or group. Vilification is unlawful for certain characteristics, including race, religious belief or activity, sexual orientation, gender identity, and HIV or AIDS status, under Victorian and Commonwealth law.
Whole-of-Organisation [NC]	An approach applied across all areas of CGSI's operations and at all levels, that is evidence-informed, uses multiple strategies, and is subject to ongoing monitoring and evaluation, including in respect of leadership, culture and environment; structures, norms and practices; systems and infrastructure; service delivery such as curriculum, teaching and learning; policies and procedures; management and governance; community engagement; business; research; and partnerships.

4.0 Responsibilities

Governing Body

Holds strategic oversight of CGSI's compliance. Endorses the Whole-of-Organisation Gender-based Violence Prevention and Response Plan and any amendments to it. Receives reporting against the Plan's Outcomes Framework at least every six months, including De-identified data on incidents of Gender-based Violence and identification of trends. Must include, within its own membership or within a subcommittee that reports directly to it and holds delegated responsibility, expertise in Student and Staff safety and wellbeing.

Higher Education Principal Executive Officer (Chief Executive Officer)

Accountable for CGSI's compliance with the National Code. Leads the preparation, implementation and publication of the Whole-of-Organisation Gender-based Violence Prevention and Response Plan. Must satisfy themselves that extensions of time for the finalisation of Formal Reports are permitted only where required in the particular context. Provides the biennial report on the Plan and its Outcomes Framework to the Secretary of the Department of Education. Retains accountability for compliance but is not the routine recipient of a Staff report, so that the person accountable for the response is not also the person receiving and supporting it.

Chief of Staff

The first point of contact for Staff on any wellbeing, safety or conduct matter, including any unsafe behaviour under clause 5.2. This is not limited to particular categories of unsafe behaviour. Receives the report, provides immediate support, explains the pathways available, and refers it for management under this policy. Responsible for ensuring that complaints and grievances from Staff are handled appropriately, for the declarations and conflict of interest management required by clause 5.15, and for the screening and declarations required by clause 5.16.

Where a report concerns the Chief of Staff, or the Chief of Staff has a conflict of interest in the matter, the report is made to the Higher Education Principal Executive Officer. Where a report concerns the Higher Education Principal Executive Officer, it is made to the Chair of the Governing Body. There is no matter under this policy for which no independent recipient exists.

Academic Board

Holds oversight of Student wellbeing and of learning environment standards. Endorses this policy and receives quarterly progress reporting on implementation.

Finance and Risk Committee

Holds oversight of institutional risk and of resourcing. Gender-based violence is a standing agenda item. Receives trend reporting from the register maintained under clause 5.17.

Student Success Coordinator

The first point of contact for Students on any wellbeing, safety or conduct matter, including any unsafe behaviour under clause 5.2. This is not limited to particular categories of unsafe behaviour.

Receives the report, provides immediate support, explains the pathways available and the support services at clause 6.4, records the matter for the register under clause 5.17, and refers it to the Grievance Advisor.

Where a Disclosure of Gender-based Violence is received, the Student Success Coordinator is the Staff member assigned under clause 5.6 to develop the support plan with the Discloser, so that the Discloser is not required to repeat their account to a second person. Consistently with clause 5.8, where the Student Success Coordinator supports a Discloser they must not also support the Respondent in the same matter.

Must complete the education and training required under clause 5.18, including the specialised training on responding to a Disclosure, being the first Staff member likely to receive one.

The Student Success Coordinator does not investigate, does not determine a pathway, and is not a decision-maker.

Head of Student Engagement, as Grievance Advisor

Holds operational leadership of CGSI's prevention and response practice. Receives Disclosures and Formal Reports from Students, advises on pathways, and coordinates support planning. Must not be assigned to support both the Discloser and the Respondent in the same matter, and must not act as decision-maker in a matter in which they have provided support to a party.

Director of Institutional Effectiveness and Governance

Maintains the register required under clause 5.17 and the data set required by Standard 6 of the National Code. Prepares reporting to the Academic Board, the Finance and Risk Committee, the Governing Body and the Secretary.

Managers and senior Staff

Must be alert to indicators of unsafe behaviour, including changes in relationships between Students and Staff, patterns in complaints and grievances, absence, attrition and withdrawal. Must make prompt referrals and must not attempt to resolve a Disclosure of Gender-based Violence informally or outside this policy.

All Staff

- must not engage in, contribute to or condone unsafe behaviour;
- must respond safely to a Disclosure within the limits of their role, and refer promptly rather than investigate;
- must complete the education and training required under clause 5.18;
- must make the declarations required under clauses 5.15 and 5.16; and
- must take reasonable care for their own health and safety and for the health and safety of others.

5.0 Policy

5.1 Duty of care

CGSI's duty of care requires all Staff and Students to take reasonable care to avoid reasonably foreseeable harm. The wellbeing and safety of Students, Staff, volunteers and visitors is the first priority in any situation, and takes precedence over the completion of any process set out in this document.

5.2 Unsafe behaviour

All members of the CGSI Community have obligations to ensure that unsafe behaviour does not go unnoticed. Unsafe behaviour under this policy includes, but is not limited to:

- bullying;
- disregard for cultural safety;
- discrimination;
- Gender-based Violence;
- harassment;
- hazing;
- racism, racial discrimination and racial vilification;
- sexual assault;
- sexual harassment;
- sexual misconduct;
- vilification; and
- victimisation.

Where unsafe behaviour involves Gender-based Violence, the specific requirements of clauses 5.3 to 5.18 apply in addition to CGSI's general response to unsafe behaviour. CGSI's approach is also informed by the TEQSA Good Practice Note on preventing and responding to sexual assault and sexual harassment (2020), which is guidance and does not displace the requirements of the National Code.

5.3 Gender-based Violence and racism are unacceptable

Gender-based Violence is unacceptable at CGSI. It is a serious harm, it is never the fault of the person who experiences it, and in the case of sexual assault it is a crime.

CGSI recognises that Gender-based Violence is driven by gender inequality and by rigid gender stereotypes, roles and expectations, and that harm is not evenly distributed. Members of the CGSI Community who are disproportionately affected include women, First Nations people, culturally and linguistically diverse communities, people with disability, and

people of diverse sexual orientation and gender identity. CGSI also recognises two features of its own model that shape risk: the one-to-one mentor session, which is conducted privately and without observation, and a workforce and student body distributed across many time zones and jurisdictions.

Racism is unacceptable at CGSI, in any form, including antisemitism, Islamophobia and racism towards Aboriginal and Torres Strait Islander peoples. It is never the fault of the person who experiences it. Racism and its forms are defined at section 3.0 of the Diversity, Equity and Inclusion Policy, and CGSI's commitments on prevention, cultural safety and response are set out in that policy. Racism is unsafe behaviour under clause 5.2 and is responded to under this policy.

CGSI will not treat the absence of recorded reports as evidence of the absence of Gender-based Violence or of racism.

5.4 Person-centred and Trauma-informed practice

CGSI will ensure that its responses, practices and support services are safe, Person-centred and consistent with a Trauma-informed approach and with best practice.

In practice this means CGSI will:

- prioritise physical, psychological and emotional safety in every decision;
- be transparent about what it can and cannot do, so that trust is not built on undertakings CGSI cannot keep;
- offer choice, and seek and seriously consider the views and wishes of the Discloser when deciding how to respond;
- work collaboratively with the Discloser rather than deciding on their behalf; and
- support the Discloser's agency and their continuing participation in study or work, and minimise the risk of re-traumatisation.

These commitments apply to the content of this policy and to its application, including how Staff speak with a person who makes a Disclosure, how records are kept, and how decisions are explained.

Clauses 5.5 to 5.14 are drafted to meet the specific requirements of the National Code for Gender-based Violence. CGSI applies the same principles, so far as they are relevant, to a report of any other unsafe behaviour under clause 5.2, including racism, bullying, discrimination, harassment, hazing, vilification and victimisation. A person who reports any unsafe behaviour is entitled to support, to safety measures, to Procedural Fairness if they are a respondent, to protection from reprisal, and to be free of any requirement to keep the matter confidential.

5.5 Procedural Fairness

CGSI will provide Procedural Fairness to a Respondent in any investigation or disciplinary process. This requires that:

- the Respondent is informed of the allegations, including sufficient particulars to enable a response;
- the Respondent has a reasonable opportunity to be heard and to respond to any prejudicial material that may be taken into account;
- the decision-maker is free from bias and from any conflict of interest, and has not provided support to either party in the matter; and
- the decision is made on the evidence, and reasons for the decision are recorded and provided.

Procedural Fairness for the Respondent and a Person-centred, Trauma-informed response for the Discloser are not in conflict. Both are required, and neither is to be traded against the other.

5.6 Support for Disclosers

CGSI will provide or facilitate access to support services for any person who makes a Disclosure or a Formal Report, whether or not they wish to proceed to an investigation, and whether or not the conduct occurred in a CGSI setting.

CGSI will assign Staff with relevant expertise and experience to develop a tailored support plan collaboratively with the Discloser. The support plan will address:

- any measures necessary to ensure the safety of the Discloser;
- urgent access to support services, prioritised when needed or requested;
- urgent access to the services of an Accredited Specialist, prioritised when needed or requested;
- urgent access to translation and interpreter services, prioritised when needed or requested;
- reasonable academic adjustments and, for Staff, work adjustments, so that a Disclosure does not cost a person their progress in study or work;
- arrangements to ensure, so far as possible, that the Discloser is not required to repeat the content of a Disclosure or Formal Report multiple times to multiple people;
- ongoing risk assessment to manage and monitor identified risks; and
- where relevant, an explanation of the investigation and disciplinary processes, the Discloser's role in them if any, the range of resolutions and sanctions available if an allegation is substantiated, and the support available throughout.

When implementing safety measures, CGSI will engage with and seriously consider the views of the Discloser.

5.7 Support for Respondents

CGSI will assign Staff with relevant expertise and experience to develop, in consultation with the Respondent, a tailored support plan. The support plan will address:

- the implementation of any measures necessary to ensure the safety of the Discloser that may adversely affect the Respondent, and an explanation of those measures;
- access to support services, and to the services of an Accredited Specialist, prioritised when needed or requested;
- access to translation and interpreter services, prioritised when needed or requested;
- academic or work adjustments;
- ongoing risk assessment; and
- where relevant, an explanation of the investigation and disciplinary processes, the Respondent's role in them, and the range of resolutions and sanctions available if an allegation is substantiated.

The provision of support to a Respondent does not imply any view about whether an allegation is substantiated, and the provision of support to a Discloser does not imply that it is.

5.8 Separation of support roles

The same Staff member must not be assigned to support both the Discloser and the Respondent in the same matter. This applies without exception.

The Head of Student Engagement is the primary support contact for a Discloser. A second Staff member, nominated by the Chief of Staff and trained in accordance with clause 5.18, provides support to a Respondent.

To give effect to this, CGSI will maintain at least two Staff with the expertise and experience required to provide support under clauses 5.6 and 5.7, and a separate person to act as decision-maker. Where CGSI does not hold sufficient separate Staff with the necessary expertise, it will engage a suitably qualified person external to CGSI. Resource constraint is not a ground for assigning one person to both parties.

5.9 Risk assessment

CGSI will undertake a risk assessment in response to every Disclosure and every Formal Report of Gender-based Violence, and will manage and monitor identified risks on an ongoing basis rather than once.

A risk assessment under this policy must be conducted by a person who has expertise in Gender-based Violence risk assessment, competency in working with specific cohorts including First Nations people, culturally and linguistically diverse communities, people with disability and people of diverse sexual orientation and gender identity, and relevant knowledge of evidence-based static and dynamic risk and protective factors, the types, patterns and effects of Gender-based Violence, how it is experienced by different groups, and the nature and impact of coercive control.

Where CGSI identifies that it does not have Staff with that expertise and experience, it will engage a suitably qualified person external to CGSI. In urgent circumstances CGSI will act immediately and consistently with its duty of care, and will complete a full risk assessment as soon as practicable afterwards.

5.10 Resolution pathways and alternative dispute resolution

CGSI does not operate a formal alternative dispute resolution scheme. Where a complaint concerns unsafe behaviour other than Gender-based Violence, and both parties freely agree, CGSI may use mediation or conciliation, and may refer the parties to an external mediator in accordance with the Student Grievance, Complaints and Appeals Policy and Procedure.

Different rules apply to Gender-based Violence. CGSI will not require, propose or treat as a default any process that brings a Discloser into direct contact with a Respondent. Mediation is never a precondition to any other pathway and is never a step a Discloser must complete before a Formal Report will be considered.

A resolution implemented with the agreement of the Discloser and the Respondent is one of several legitimate pathways available under the Student Grievance, Complaints and Appeals Policy and Procedure. It is available only where the Discloser requests it or freely agrees to it, having been told what the alternatives are. The other pathways available include the implementation of safety measures without progressing to an investigation, a decision not to proceed to an investigation in the specific circumstances, and a decision to progress to an investigation. CGSI will have regard to the wishes of the Discloser when determining which pathway to use.

5.11 Precautionary and safety measures

CGSI may take precautionary measures at an early stage, pending the outcome of criminal or disciplinary proceedings, to ensure a full and proper investigation can be carried out and to protect the wellbeing of the person who experienced the alleged conduct or of others. Precautionary measures will be reasonable and proportionate, will be explained to the person affected, and may include altered supervision or mentoring arrangements, restricted contact between the parties, reassignment of work, or suspension.

Where a Student or Staff member alleges that they have experienced Gender-based Violence, CGSI will make alternative teaching, mentoring, research supervision, employment or other arrangements as necessary to ensure the safety of Students and Staff. So far as practicable, CGSI will not place the burden of adjustment on the Discloser.

5.12 Confidentiality and information sharing

CGSI treats information about a Disclosure or Formal Report as sensitive, and shares it only with those who need it to provide support, assess and manage risk, make a decision, or meet a legal obligation.

CGSI cannot promise absolute confidentiality, and this policy does not do so. CGSI may share information without the consent of the Discloser where it is necessary to ensure the safety and wellbeing of Students or Staff, where it is required or authorised by law, or where it is

necessary to meet CGSI's reporting obligations under the National Code. Where this occurs, CGSI will so far as practicable tell the Discloser before it happens, explain why, and explain what will be shared and with whom.

Nothing in this policy, and no direction given under it, prevents a Discloser from sharing their own experience, including for the purpose of seeking support, advice or medical care, or from contacting the police or an external body at any time. A person is not in breach of any CGSI policy by doing so.

Personal information is handled in accordance with the Privacy Act 1988 (Cth) and the Australian Privacy Principles. Gender, gender identity, sexual orientation, race or ethnicity, religion, Indigenous status, disability status and health information are sensitive information, and information about a person's experience of Gender-based Violence is sensitive information. Data collected under clause 5.17 will be collected in a safe, Trauma-informed and Person-centred manner, held securely, and De-identified before any reporting. Collection, use and disclosure are recorded in CGSI's Information Asset and Processing Register.

5.13 Non-disclosure agreements and non-disparagement

CGSI prohibits the use of a Non-disclosure Agreement in relation to Gender-based Violence unless it is requested by the Discloser.

Where a Discloser requests a Non-disclosure Agreement, that agreement must not prevent the Discloser from sharing their experience for the purpose of seeking support and advice, and must not prevent CGSI from complying with its reporting obligations under the National Code.

Settlement terms agreed between a Discloser and CGSI must not contain a Non-disparagement Clause that could have the effect of requiring the Discloser to keep their experience of Gender-based Violence confidential.

5.14 Protection from reprisal

CGSI prohibits victimisation and reprisal. No person will be disadvantaged in their study, employment, engagement, assessment, progression or standing because they have made a Disclosure, Formal Report or complaint, provided information, supported another person to do so, or participated in a process under this policy.

Reprisal is itself unsafe behaviour under clause 5.2 and may result in disciplinary action. A person who believes they have been subject to reprisal may raise it as a separate matter.

5.15 Personal relationships and conflicts of interest

CGSI requires Staff to declare any existing or previous intimate personal relationship with:

- another Staff member, where one has or is likely to have any supervisory, oversight or decision-making responsibility in relation to the other; and
- a Student, where the Staff member has or is likely to have any academic, mentoring or other decision-making responsibility in relation to that Student.

Where such a declaration is made, CGSI will implement a conflict of interest management plan that includes permanent alternative teaching, mentoring, research or working arrangements as necessary. Declarations are made to the Chief of Staff and recorded confidentially. Where the declaration concerns the Chief of Staff, it is made to the Higher Education Principal Executive Officer.

5.16 Screening and declarations

1. CGSI will ensure that Staff comply with the Working with Children Check or equivalent requirements of the State or Territory in which they are employed or engaged, including in relation to on-site and hybrid delivery at the GameChanger Academy.
2. As part of the engagement process, CGSI will ask prospective employees, prospective Staff and prospective members of the Governing Body to declare whether they have been investigated for an allegation of Gender-based Violence, or determined to have engaged in conduct constituting Gender-based Violence, during previous employment or engagement or in any legal process.
3. Consistently with its duty of care, CGSI will take any such declaration and any risk arising from it into consideration in determining the person's suitability for the position.
4. CGSI will take any substantiated allegation of Gender-based Violence found in the course of a person's employment or engagement into consideration in decisions about promotion, recognition and reward.
5. Where Staff are not employees, CGSI will address any material risk arising where they have been investigated for, or determined to have engaged in, Gender-based Violence.

5.17 Recording, monitoring and reporting

All Disclosures, Formal Reports and complaints of Gender-based Violence, racism, sexual misconduct and other unsafe behaviour are recorded on the Critical Incidents Register. The Register is maintained under the authority of the Higher Education Principal Executive Officer, with day to day custody held by the Director of Institutional Effectiveness and Governance.

Records of Gender-based Violence Disclosures and Formal Reports must capture the data set required by Standard 6 of the National Code, including De-identified Demographic Data, the mode by which the Disclosure was made, whether it was anonymous, the safety measures and supports implemented, the pathway used, and outcomes and timeframes. Anonymous Disclosures are recorded and acted on so far as is reasonable and proportionate, including by identifying trends and risks.

Reporting operates as follows:

- trends and patterns identified in the Register are reported to the Academic Board and to the Finance and Risk Committee;
- the Governing Body receives reporting against the Outcomes Framework of the Whole-of-Organisation Plan at least every six months, including De-identified incident data and trends, from 30 June 2027;

- the Higher Education Principal Executive Officer provides a report on the Plan and its Outcomes Framework to the Secretary of the Department of Education every two years; and
- CGSI provides the annual data required under Standard 6 to the Secretary by 30 June each year, with the first submission due 30 June 2028 in respect of the 2027 calendar year.

De-identified data will be analysed at least every six months to identify themes, barriers, gaps and opportunities for improvement, and the findings used to strengthen CGSI's Whole-of-Organisation approach.

5.18 Prevention education and training

CGSI will deliver ongoing, comprehensive prevention education and training to Students, Leadership and Staff, including mentors and teaching assistants, covering the recognition, prevention of and response to Gender-based Violence, racism, sexual assault, sexual harassment, bullying, discrimination and harassment. It will be evidence-informed, Trauma-informed in content and delivery, tailored to CGSI's community and context, culturally appropriate, accessible to people with disability, and designed to support learning over time.

Staff and Students in leadership positions, Leadership, and any other person CGSI considers necessary will complete specialised education and training on responding to a Disclosure as part of onboarding and at least annually thereafter. That training will teach a Trauma-informed and Person-centred approach, build awareness of the effects of trauma on behaviour, memory, health and wellbeing, and be developed with or approved by an Accredited Specialist, a specialist organisation, or a person with expertise in responding to Gender-based Violence.

Staff involved in responding to Formal Reports, conducting investigations or determining disciplinary proceedings must hold the knowledge, experience and expertise required by Standard 3 of the National Code, including in Procedural Fairness, taking and recording statements, and the nature and impact of coercive control, and must undertake training in those areas at least once every three years.

All education and training is developed through engagement with experts in the prevention of Gender-based Violence, Students, Staff, people who have experienced Gender-based Violence, and groups disproportionately affected by it. It is designed to manage safely any Disclosure that arises during delivery, including by providing information about internal and external support services and reporting channels. This policy is brought to the attention of all Staff on induction, on appointment, and at least annually thereafter.

6.0 Procedure

6.1 Making a Disclosure or a Formal Report

You can tell CGSI about any unsafe behaviour under clause 5.2, including Gender-based Violence and racism, in any of the following ways. The same channels serve every kind of report. You do not need to have decided what you want to happen next, and you do not need to use particular words.

- in person, including at the GameChanger Academy or in a scheduled online session;
- by email to the Grievance Advisor or the Student Success Coordinator;
- by telephone, using the numbers published on the Learning Management System and the CGSI website; and
- online, using the online disclosure and complaint form on the Learning Management System and the CGSI website at <https://www.cgspectrum.com>

A Disclosure or Formal Report may be made anonymously. CGSI will act on an anonymous report so far as is reasonable and proportionate, and will record it so that trends and risks can be identified, but its ability to investigate or to provide direct support may be limited if it cannot contact you.

A third party may make a Disclosure or a Formal Report where the Respondent is a Student or a Staff member. This includes another Student, a Staff member, a family member, or a supervisor at a work integrated learning host.

A Disclosure and a Formal Report are different. A Disclosure means telling CGSI what happened, and gives you access to support. A Formal Report asks CGSI to consider steps beyond support, which may include an investigation and a disciplinary process. You can make a Disclosure without making a Formal Report, and you can decide later to make a Formal Report.

6.2 What CGSI will do

1. CGSI will acknowledge your Disclosure or Formal Report, and will explain what happens next and what support is available.
2. CGSI will act immediately on anything requiring an urgent safety response, and will undertake a risk assessment under clause 5.9.
3. CGSI will assign a Staff member to work with you on a support plan under clause 5.6. A different Staff member will support the Respondent.
4. CGSI will explain the pathways available under clause 5.10 and will seek and seriously consider your views about which one is used.
5. Before progressing a Disclosure to an investigation, CGSI will seek and consider your views. CGSI will tell you that it may investigate a Disclosure without your agreement where this is necessary for the safety and wellbeing of Students or Staff.

6. CGSI will investigate all Formal Reports where the Respondent is a Student or a Staff member, regardless of the context in which the conduct occurred.
7. CGSI will keep you informed, will provide the outcome in writing, and will tell you about your right to make an internal or external complaint, including to the National Student Ombudsman.

You may be accompanied by a Support person whenever you are asked about the matters that are the subject of a Disclosure or Formal Report. CGSI will not require you to provide physical evidence of an alleged incident.

The channels, pathways, timeframes and notification requirements that apply to a Formal Report, including the requirement that a Formal Report be capable of finalisation within 45 business days and an appeal within 20 business days, are set out in the Student Grievance, Complaints and Appeals Policy and Procedure. A Disclosure or Formal Report by a Staff member is received through the channels at clause 6.1 and managed under this policy. Any disciplinary consequence for a Staff Respondent is dealt with under the applicable employment arrangements.

6.3 First point of contact

The following applies to a report of any unsafe behaviour under clause 5.2. Contact details for each role are published on the Learning Management System and the CGSI website.

If you are	First point of contact	Or you may contact
A Student, including a prospective or former Student	Student Success Coordinator	Grievance Advisor
A Staff member, including a mentor or teaching assistant	Chief of Staff	Higher Education Principal Executive Officer
Any person, where the report concerns the Chief of Staff	Higher Education Principal Executive Officer	Chair of the Governing Body
Any person, where the report concerns the Higher Education Principal Executive Officer	Chair of the Governing Body	The police, or an external body under clause 6.6

You are not required to approach the first point of contact before using an alternative. You may contact the police, a support service or an external body at any time, whether or not you have told CGSI.

6.4 Support services

CGSI will explain the support available, help you access it, and prioritise urgent access to an Accredited Specialist and to translation and interpreter services where needed or requested. Support includes reasonable academic adjustments so that a Disclosure does not cost you your progress.

CGSI's Students and Staff are located in many countries. The services listed below are Australian. If you are outside Australia, CGSI will help you identify and access equivalent local services, and will provide information in a form that can be translated.

Service	Contact	Focus
1800RESPECT	1800 737 732	National sexual assault, domestic and family violence counselling, 24 hours
Full Stop Australia	1800 385 578	National trauma specialist counselling for people of all genders, 24 hours
Sexual Assault Crisis Line Victoria	1800 806 292	Victorian after-hours crisis line for people who have experienced sexual assault
13YARN	13 92 76	Crisis support for Aboriginal and Torres Strait Islander people, 24 hours
QLife	1800 184 527	Peer support for LGBTIQ+ people
Lifeline	13 11 14	Crisis support and suicide prevention, 24 hours

Prevention resources, including the Universities Australia Respect.Now.Always materials, are available on the Learning Management System, the CGSI website, and in the Staff and Student Handbooks.

6.5 Emergency contacts

In an immediate emergency in Australia, call 000 for police or ambulance. Outside Australia, call your local emergency number. Sexual assault is a crime. Police are trained to provide assistance and advice to people who have experienced sexual assault, and a report can be made by telephone, by attending a station, or through any anonymous reporting option available in your jurisdiction. You may contact the police at any time, whether or not you have told CGSI, and CGSI will assist you to do so if you wish.

6.6 External avenues

Nothing in this policy limits your right to pursue an external avenue at any stage. Depending on your circumstances these may include the National Student Ombudsman, the Australian Human Rights Commission, a State or Territory equal opportunity or anti-discrimination body, the Fair Work Commission, a State or Territory ombudsman, the police, or a court or tribunal. CGSI will implement any recommendation made to it by the National Student Ombudsman in relation to Gender-based Violence.

7.0 Review, Consultation and Publication

7.1 Review cycle

This policy and procedure will be developed and reviewed at least every three years, and earlier where CGSI's duty of care, a change in its delivery model, a regulatory change, or a finding from the analysis of Register data indicates that review is required. Amendments that affect the Whole-of-Organisation Gender-based Violence Prevention and Response Plan must be endorsed by the Governing Body.

7.2 Consultation

Development and review will occur through engagement and collaboration with:

- Students;
- employees;
- groups who are disproportionately affected by Gender-based Violence, including women, First Nations people, culturally and linguistically diverse communities, people with disability, and people of diverse sexual orientation and gender identity;
- people who have experienced Gender-based Violence;
- subject matter experts on Gender-based Violence; and
- third parties whose facilities are used by Students or Staff to undertake work integrated learning, placements or practicums.

Consultation is conducted at a scale proportional to CGSI's size, delivery model and resources. CGSI is a small provider with a globally distributed community and does not maintain a standing representative committee for each group. It consults through targeted conversations, an anonymous instrument open to all Students and Staff, mentor and staff professional development sessions, and its cross-institutional working group, and it engages external expertise where it cannot identify representation from within its own community. The obligation to consult each group listed above is not reduced by CGSI's size. The method by which CGSI consults is.

A record of consultation is maintained, including who was consulted, how, and how their views informed the outcome. The Secretary of the Department of Education may require CGSI to report on how that engagement informed the development and review of this policy.

7.3 Publication and accessibility

This policy and procedure is published on the CGSI website. It is drafted in plain English and is able to be translated into other languages, taking into account the demographics of CGSI's Students and Staff. Its classification is Public.

8.0 Related Documents

Gender-based violence governance instruments

- Whole-of-Organisation Gender-based Violence Prevention and Response Plan
- Gender Equality Action Plan, prepared under National Code Standard 1.4(g)
- Critical Incidents Register
- Information Asset and Processing Register

Policies and procedures

- Diversity, Equity and Inclusion Policy, CGSI-ACA-POL-013
- First Nations Policy, CGSI-ACA-POL-017
- Student Grievance, Complaints and Appeals Policy and Procedure, CGSI-ACA-POL-022
- Student Discipline Policy and Procedure, CGSI-ACA-POL-021
- Student Welfare and Support Policy and Procedure, CGSI-ACA-POL-027
- Students at Risk Policy and Procedure, CGSI-ACA-POL-028
- Work Integrated Learning Policy and Procedure, CGSI-ACA-POL-030
- Critical Incident Policy and Procedure
- Work Health and Safety Policy
- Privacy Policy and Data Governance Policy
- Student Code of Conduct and Staff Code of Conduct

Legislative and regulatory instruments

- National Higher Education Code to Prevent and Respond to Gender-based Violence 2025 (Cth)
- Universities Accord (National Higher Education Code to Prevent and Respond to Gender-based Violence) Act 2025 (Cth) and Consequential Amendments Act 2025 (Cth)
- Higher Education Standards Framework (Threshold Standards) 2021 and the Amendment (Threshold Standards) Instrument 2026
- Sex Discrimination Act 1984 (Cth), section 47C positive duty
- Equal Opportunity Act 2010 (Vic), positive duty
- Privacy Act 1988 (Cth) and the Australian Privacy Principles
- Ombudsman Act 1976 (Cth), Part IIF, National Student Ombudsman
- Model Work Health and Safety Act and applicable work health and safety law

- TEQSA Good Practice Note: Preventing and responding to sexual assault and sexual harassment (2020), guidance

Version Control

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