Australian Government

Tertiary Education Quality and Standards Agency

Report to the Minister for Education: Higher education sector response to the issue of sexual assault and sexual harassment

An overview of Australian higher education provider responses to the issue of sexual assault and sexual harassment

January 2019

TEQSA

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1. Executive summary

In August 2017, the Australian Human Rights Commission (AHRC) released *Change the Course: National Report on Sexual Assault and Sexual Harassment at Australian Universities* report, which presented the AHRC's findings on the prevalence and nature of sexual assault and sexual harassment in Australian universities. The AHRC's report also provided universities with nine recommendations to prevent and respond to the issue of sexual assault and sexual harassment.

In response to the *Change the Course* report findings, the then Minister for Education and Training, Senator the Hon Simon Birmingham, requested that all Australian universities inform TEQSA about their approach to the issues raised in the report.

While the *Change the Course* report focused on universities, the issue of sexual assault and sexual harassment is not unique to universities. In December 2017, the then Minister also wrote to the Australian Council for Private Education and Training (ACPET), the Council of Private Higher Education (COPHE) and TAFE Directors Australia (TDA), with a similar request for information outlining their members' response to the issue to be sent to TEQSA. In February 2018, following discussions with ACPET, COPHE and TDA, TEQSA wrote to independent and TAFE higher education providers.

This report presents TEQSA's analysis of the responses and information on the websites of 42 universities and 126 independent and TAFE higher education providers. The report explains the method by which the analysis was undertaken, and details the actions TEQSA is taking to support provider responses to the incidence of sexual assault and sexual harassment.

TEQSA found that the majority of universities have accepted the *Change the Course* recommendations and are responding comprehensively to the issue of sexual assault and sexual harassment. TEQSA observed that the universities have been well supported by Universities Australia (UA), whose *Respect. Now. Always.* campaign commenced in 2016. TEQSA's analysis includes the following findings:

- **40** universities (95 per cent) have adopted the recommendations of the *Change the Course* report, and all universities have established a sexual assault/sexual harassment taskforce
- **39** universities (93 per cent) have a policy on sexual assault and sexual harassment
- **39** universities (93 per cent) have conducted a review of existing policies and response pathways in relation to sexual assault and sexual harassment; **19** (45 per cent) of those were conducted by an external expert
- **29** universities (69 per cent) have also conducted a review of their counselling services and student accommodation
- **39** universities (93 per cent) report offering online and face-to-face training
- **all** universities offer counselling services and **39** (93 per cent) also collaborate with an external sexual assault service provider
- **all** universities report incident data internally and **nine** (21 per cent) also report incident data publicly.

Overall, the response of the 126 independent and TAFE higher education providers to the issue of sexual assault and sexual harassment has not been as comprehensive as that of the universities. However, the group's peak bodies (COPHE, ACPET and TDA) are committed to working with TEQSA to support their members to respond to the issue of sexual assault and sexual harassment. TEQSA's findings include:

- **73** independent and TAFE higher education providers (58 per cent) report having a policy in relation to sexual assault and/or sexual harassment

- **16** independent and TAFE higher education providers (13 per cent) have completed a review of sexual assault and sexual harassment

- **21** independent and TAFE higher education providers (17 per cent) have established a sexual assault/sexual harassment taskforce

- **47** independent and TAFE higher education providers (37 per cent) report incident data internally

- **52** independent and TAFE higher education providers (41 per cent) report offering face-to-face training seminars

- **58** independent and TAFE higher education providers (46 per cent) report that internal counselling is available and **44** (35 per cent) offer access to counselling externally. No independent and TAFE higher education providers have conducted a review of counselling and **31** independent and TAFE higher education providers (25 per cent) do not offer counselling at all.

Following on from the analysis, TEQSA will look for evidence to confirm that all higher education providers are taking action to prevent and reduce the incidence of sexual assault and sexual harassment, and to respond to, and support, the victims of sexual assault and sexual harassment appropriately, and in a timely manner.

Sexual assault and sexual harassment are complex and sensitive issues, and TEQSA is limited in its capability to address the many drivers in the wider society that may contribute to the issues experienced in a higher education setting. Nevertheless, the *Higher Education Standards Framework (Threshold Standards) 2015* (HES Framework) is clear concerning the responsibilities of providers for ensuring wellbeing and safety within the learning environment, and TEQSA will monitor the higher education sector for assurance that all providers are effectively implementing their policies and procedures. TEQSA will give guidance and support to providers that want or need to take further action, and will rigorously investigate any complaints it receives.

2. Introduction

In 2015, *The Hunting Ground*, a documentary about the incidence of sexual assault on college campuses in the United States, was released and encouraged a global movement for change and action. UA launched its *Respect. Now. Always.* initiative in 2016 and commissioned the AHRC to conduct a national survey of over 30,000 students. The survey provided insight into the nature, prevalence and reporting of sexual assault and sexual harassment at Australian universities, and the data was published in the AHRC's *Change the Course* report. The AHRC (p.1) concluded that:

- 'sexual assault and sexual harassment are far too prevalent in university settings (as they are in the broader community)

- there is significant under-reporting of sexual assault and sexual harassment to the university

- universities need to do more to prevent such abuse from occurring, build a culture of respect, respond appropriately to, and support victims, and sanction perpetrators'.

Significantly, the AHRC reported that 51 per cent of all university students reported having been sexually harassed on at least one occasion in 2016 (26 per cent in a university setting[1]), and 6.9 per cent of university students reported having been sexually assaulted on at least one occasion in 2015 or 2016 (1.6 per cent in a university setting).

The *Change the Course* report also includes eight recommendations for change directed at universities and one aimed at residential colleges and university residences. The AHRC did not propose recommendations for independent and TAFE higher education providers, as their students were not included in the survey. However, the AHRC recommendations are a useful guide for all providers.

At the same time, UA published its *10-point Action Plan*, which directs UA's support for its members to address the issue of sexual assault and sexual harassment, and the Australian Human Rights Centre at the University of New South Wales published *On Safe Ground: Strengthening Australian university responses to sexual assault and harassment – A good practice guide for Australian universities*. A year later, in August 2018, UA published its *Guidelines for University Responses to Sexual Assault and Sexual Harassment* (UA's Guidelines) and *Principles for Respectful Supervisory Relationships*.

In response to the *Change the Course* report findings, the then Minister for Education and Training wrote to all universities, asking them to respond quickly and comprehensively to the recommendations and take all necessary actions to ensure that Australian universities are places of safety and respect. The Minister asked universities to 'comply with any TEQSA requests as a matter of priority and provide TEQSA with a full account of the measures [they] are undertaking to implement the recommendations of the [AHRC] report'.

The Minister asked TEQSA to monitor and report on higher education providers' responses to incidents of sexual assault and sexual harassment as part of its ongoing assurance role, to evaluate the content of the providers' responses, and to provide the Minister with an overview. All higher education providers are required to meet the HES Framework as the basis for their registration with TEQSA. The elements of the HES

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[1] 'University settings' included sexual assault and sexual harassment that occurred on the university campus, while travelling to or from university, at an off-campus event organised by or endorsed by the university, and at university employment (p.11).

Framework that relate to sexual assault and sexual harassment are sections 2.3 (Wellbeing and Safety) and 2.4 (Student Grievances and Complaints).

In December 2017, the Minister also wrote to ACPET, COPHE and TDA, asking them to ensure that their members respond fully and appropriately to incidents of sexual assault and sexual harassment, and put in place arrangements to manage the risk. At the same time, the AHRC delivered a full audit of the universities' responses to the *Change the Course* report. In February 2018, to ensure that TEQSA's analysis covered the whole sector, TEQSA spoke with ACPET, COPHE and TDA representatives. It was decided that the most efficient way to manage correspondence was for TEQSA to contact each provider directly. In February-March 2018, TEQSA therefore wrote directly to all independent and TAFE higher education providers, and then proceeded to analyse the responses of all of the providers in the sector.

> This report presents TEQSA's analysis of the responses and websites of 42 universities and 126 independent and TAFE higher education providers and also details what actions TEQSA is taking to support provider responses to the issue of sexual assault and sexual harassment.

The methodology for the analysis is provided in Appendix 1.

3. University responses

Appendix 2 provides a quantitative overview of how the 42 universities are managing their responses to sexual assault and sexual harassment, as at November 2018. This report provides qualitative and contextual information for universities (in section 3) and independent and TAFE higher education providers (in section 4). The information is clustered under headings that relate directly to the methodology for the analysis, which is provided in Appendix 1.

3.1   Leadership and Governance

The AHRC identifies university leadership and organisational support as crucial to significant reform, and recommends that vice-chancellors take direct responsibility for implementation of the recommendations. In August 2017, each of the university vice-chancellors made a statement on sexual assault and sexual harassment in higher education. All universities have established, or plan to establish, a taskforce/advisory body on sexual assault and sexual harassment and the vice-chancellors of ten universities (24 per cent) lead their institution's taskforce.

The AHRC recommends that the taskforce has representatives from the university's senior leadership; the student body; academic staff; residential colleges affiliated with the university; student services (such as counselling services, medical services and campus security); and frontline sexual assault services. Many Australian universities have representation from senior leadership, students, academic staff, and student services. However, fewer have representation from residential colleges and frontline sexual assault services. TEQSA found that 35 university taskforces (85 per cent) had student representation. Some taskforces also include external stakeholders, such as police and sexual assault services, whilst others maintain these relationships outside the taskforce. A few taskforces also include representation from minority groups, residential accommodation, legal, audit and risk, communications, and community groups.

TEQSA's analysis found that 39 universities (93 per cent) have policies on sexual assault and sexual harassment. UA's Guidelines recommend that policies on sexual assault and sexual harassment should be standalone. TEQSA found that 12 universities (29 per cent) had standalone policies on sexual assault and sexual harassment.

The AHRC reported that postgraduate students are almost twice as likely as undergraduate students to have been sexually harassed by a lecturer or tutor at their university. In August 2018, UA published *Principles for Respectful Supervisory Relationships*. TEQSA found that 18 universities (43 per cent) have a policy that guides interaction between postgraduate students and staff. Some universities use either the students' or the teachers' code of conduct to state that sexual relationships between staff and students are not appropriate, while others regulate the breakdown of supervisory relationships without mentioning sexual assault or sexual harassment specifically.

The AHRC recommended that, within a year from the release of *Change the Course* (by August 2018), universities should commission an independent, expert-led review of existing university policies and response pathways in relation to sexual assault and sexual harassment. The AHRC said a review is an important step in assessing the effectiveness of a provider's response. Of the 39 universities that have conducted or are in the process of conducting a review, 20 (51 per cent) of the reviews were independent or conducted by an external party, and three of the reports are publicly available online.

3.2   Changing attitudes and behaviours

The AHRC recommended that universities educate their staff and students about behaviours that constitute sexual assault and sexual harassment, consent and respectful relationships, violence-supportive attitudes, and bystander intervention. In its *Change the Course* report, the AHRC quotes research that found that '…sexual assault and sexual harassment are often driven by deeply held norms and attitudes about women, their role in society and relationships between men and women' (p.11). Thus, '…actions addressing attitudes and norms about gender roles and relationships are integral to preventing sexual assault and sexual harassment' (ibid). Further, 'primary prevention' approaches to education and campaigns and empowering bystanders are key elements in preventing sexual assault and sexual harassment (p.174).

Universities deliver information, education and training in a variety of ways. In February 2016, UA launched the *Respect. Now. Always.* campaign that aims 'to prevent and address sexual assault and harassment across the sector'. TEQSA found that 38 universities (91 per cent) have a *Respect. Now. Always.* webpage, which provides access to information about available support services and educational programs. Providers also present information on other webpages and social media, through poster campaigns, and during special events. Other modes of education include explanations and definitions of sexual assault in student handbooks, encouraging conversations about sexual assault and sexual harassment through art, and screenings of *The Hunting Ground* documentary. More than 70 screenings of *The Hunting Ground* have been held at 33 universities (79 per cent).

UA's Guidelines stress the need for information to be available on websites, and also to be accessible. The AHRC reported that:

- *in relation to sexual harassment* – 47 per cent of students knew nothing or little about where to seek support/assistance, and 60 per cent knew nothing or little about where to make a complaint

- *in relation to sexual assault* – 57 per cent of students knew nothing or little about where to seek support/assistance, and 60 per cent knew nothing or little about where to make a complaint.

Online training is offered by 39 universities (93 per cent), and 'Consent Matters' online training for students, which includes information about ethical bystanders, is used by

26 universities (62 per cent). At ten (39 per cent) of those universities, this training is mandatory. When online training is mandatory, survivors may be triggered to consider past events, therefore some providers include a 'trigger warning' alongside the training information. Face-to-face training for student leaders and staff, which is usually delivered by external experts working in sexual assault services, is offered at 39 universities (93 per cent).

3.3   Procedures for responding

The AHRC reported that 51 per cent of all university students reported they were sexually harassed on at least one occasion in 2016, whilst 6.9 per cent reported they were sexually assaulted in 2015 or 2016. When the data is limited to a university setting (which includes travel to/from university), the rates of university students reporting they were sexually harassed and sexually assaulted were 26 per cent and 1.6 per cent, respectively.

Section 2.3 (Wellbeing and safety) of the HES Framework requires providers to advise all students of the actions they can take, the staff they may contact, and the support services that are available if their personal circumstances are having an adverse effect on their education. Regardless of where an incident occurred (on campus or elsewhere), anything that affects a student's wellbeing and their studies is an opportunity for universities to support the student through advice, counselling services, or academic support (for example, by permitting extensions to due dates for assessments). Where universities responded, 16 (38 per cent) mentioned that they had a dedicated student wellbeing policy ensuring that students who experience adverse events are supported academically and in their emotional wellbeing[2].

Section 2.3 of the HES Framework also requires providers to give students timely, accurate advice on access to personal support services, including counselling, legal advice, and advocacy. All universities provide access to counselling services and 41 (98 per cent) provide contact details for emergency sexual assault services. TEQSA also found that 39 universities (93 per cent) have a relationship with external providers of sexual assault services.

The AHRC recommended that within six months of the *Change the Course* report (by February 2018) universities should conduct an audit of counselling services. It also recommended that universities collect data on the average length of time students are required to wait to see a university counsellor and the number of urgent/crisis requests for counselling received. A review of the counselling services was conducted at 29 universities (69 per cent).

Section 2.3 of the HES Framework further requires providers to promote and foster a safe environment, including by advising students and staff on actions they can take to enhance safety and security on campus and online. TEQSA found that a range of initiatives are used to create a safe environment on university campuses, including 24/7 security personnel presence, patrolling and surveillance using closed circuit television, lighting main pathways, vegetation control, emergency call points, and shuttle/night buses.

Contact details for security services on campus were provided by 41 universities (98 per cent), and this information was generally easily accessible on their website. A security escort for staff and students on campus was offered by 36 universities (86 per cent). 35 universities (83 per cent) offered a safety app for students. Apps such as these vary in their capabilities, but can: provide university-specific emergency, medical and counselling information; allow tracking of the phone; and notify security or contact police and emergency services in the event of an incident. The AHRC's definition of

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[2] For the purposes of this analysis, TEQSA did not verify whether the other universities also had such a policy.

'university setting' includes travel to and from university and, anecdotally, a small number of universities mentioned they were working with public transport authorities to promote safety on public transport.

3.4   Monitoring and evaluation

The AHRC suggests that 'The actions universities take to prevent and respond to sexual assault and sexual harassment should be evidence-based and evaluated' (p.14). It recommends that universities evaluate activities undertaken to increase awareness of support services and reporting processes to ensure that they have been effective in increasing awareness among staff and students. As mentioned previously, independent, expert-led reviews provide an opportunity to evaluate and plan for further action.

All universities responded that they internally report data on incidents of sexual assault and sexual harassment. Whilst the AHRC report does not include the recommendation to publicly report data on incidents of sexual assault and sexual harassment, nine universities (21 per cent) have demonstrated evidence of public reporting and thus have shown a particular commitment to transparency and accountability.

3.5   Residential colleges and student accommodation

The AHRC reported that most incidents of sexual assault in a university setting occurred at a university or residence social event. TEQSA did not request information from accommodation providers. However, in its follow up to universities, TEQSA found that, in addition to student accommodation provided by or linked to universities, private student accommodation and/or residential college accommodation is available near 34 universities (81 per cent). Furthermore, contractual relationships between universities and private student accommodation providers (such as UniLodge and Urbanest) exist at 24 universities (57 per cent). Of the 34 universities with accommodation, a review of residential services had been conducted by 29 universities (85 per cent) in respect to preventing and responding to sexual assault and sexual harassment occurring at residential services.

4. Independent and TAFE higher education provider responses

In addition to universities, the higher education sector also includes 126 independent and TAFE higher education providers. Appendix 3 provides a quantitative overview of how the independent and TAFE higher education providers are managing their responses to sexual assault and sexual harassment, as at July 2018.

The following section of the report provides qualitative and contextual information on the independent and TAFE higher education providers' responses. The data reveal a challenge for this part of the higher education sector; there is a lot of work to be done. The peak bodies (ACPET, COPHE and TDA) will play an important role in supporting their members to improve their measures in response to the issue of sexual assault and sexual harassment.

4.1   Leadership and governance

Leadership is as crucial for independent and TAFE higher education providers as it is for universities. Chief executive officers (CEOs), directors and presidents of all providers should take responsibility for driving action and engagement at all levels should be encouraged. TEQSA found that 30 independent and TAFE higher education providers (24 per cent) have established, or plan to establish, a task force, and three (2 per cent) are led by the CEO. These numbers are markedly low, indicating the extent of the challenge for the majority of independent and TAFE higher education providers to initiate measures to prevent and respond to sexual assault and sexual harassment in their institutions.

More than half (73, or 58 per cent) of independent and TAFE higher education providers have policies on sexual assault and sexual harassment, and 19 (15 per cent) have standalone policies. No evidence of a policy on sexual assault or sexual harassment could be found for 53 independent and TAFE higher education providers (42 per cent). This very large number of independent and TAFE higher education providers, apparently without a policy on sexual assault or sexual harassment, is concerning. The HES Framework's Standard 2.3.1 requires providers to advise students on actions they can take in the case of personal circumstances that have an adverse effect on their studies. Policies on sexual assault and sexual harassment provide this information and are an important part of the framework required to provide an environment conducive to student wellbeing and safety. TEQSA also found that 20 independent and TAFE higher education providers (16 per cent) had conducted a review of their policies and pathways in relation to sexual assault and sexual harassment, or were intending to do so.

4.2   Changing attitudes and behaviours

Information for students relating to sexual assault and sexual harassment was found on 23 independent and TAFE higher education providers' websites (18 per cent). 'Consent Matters' online training for students is offered by five independent and TAFE higher education providers (4 per cent), and 52 (41 per cent) offer face-to-face training. Information, education and training are essential for any provider in preventing and responding to sexual assault and sexual harassment. There are many publicly-available resources that independent and TAFE higher education providers could access and connect with to begin to change attitudes and behaviours.

4.3   Procedures for responding

A dedicated student wellbeing policy, ensuring that students who experience adverse events are supported academically, is offered by 34 independent and TAFE higher education providers (27 per cent). Access to counselling services is provided by 95 independent and TAFE higher education providers (75 per cent), but none reported a review of them. Contact details for emergency sexual assault services are provided by 20 independent and TAFE higher education providers (16 per cent). A relationship with external providers of sexual assault services has been established at 10 independent and TAFE higher education providers (8 per cent). Contact details for security services on campus are provided by 20 independent and TAFE higher education providers (16 per cent) and 11 (9 per cent) offer a security escort for staff and students on campus. A safety app for students is provided by twelve independent and TAFE higher education providers (10 per cent). The small number of independent and TAFE higher education providers offering a secure escort is not surprising given that most have a small, or no, campus outside of the building in which they teach students. These relatively low numbers of providers who have measures in place to ensure their ability to respond to incidents of sexual assault and sexual harassment could leave victims of such incidents without access to the necessary resources and potentially jeopardise their recovery from the incident and consequently their ability to study.

4.4   Monitoring and evaluation

Data on incidents of sexual assault and sexual harassment are reported internally by 47 independent and TAFE higher education providers (37 per cent). Data are usually reported to the senior leadership team, executive team, or risk committee. Only one provider was found to be reporting data publicly. The number of independent and TAFE higher education providers collecting data at all is small. Without data on the number of students being sexually assaulted or sexually harassed, a provider cannot know the extent of the problem, and consequently cannot support the wellbeing and safety of their students adequately.

4.5   Residential colleges and student accommodation

Unlike universities, which generally offer student accommodation, or have private accommodation nearby, only 14 independent and TAFE higher education providers (11 per cent) offer accommodation in residential colleges and 16 (13 per cent) offer private accommodation. TEQSA did not examine the status of the relationship between independent and TAFE higher education providers and the organisations that provide accommodation for their students.

5. Conclusions

Broadly, TEQSA's findings indicate that universities have largely implemented the recommendations of the AHRC's *Change the Course* report. However, many independent and TAFE higher education providers have not yet made progress in implementing measures to address the issue of sexual assault and sexual harassment. Monitoring of the sector should be comprehensive, while appropriately adapted to the differing circumstances of the diverse range of higher education providers.

Although there are some gaps that can be followed up, universities are, by and large, actively responding to the issue of sexual assault and sexual harassment. TEQSA's role, therefore, will be focused on assurance that the universities are actually doing what they

say they are doing. A deeper analysis of what each university is doing will be conducted as part of the agency's renewal of registration process for individual providers.

One of the clear findings of the AHRC survey was that only a small number of university students felt they knew where to access information or support if an incident occurs. Again, as part of the renewal of registration process, TEQSA will ensure that information is accessible, at least on the provider's website. Through discussion with the staff at each provider who are responsible for implementing the actions on sexual assault and sexual harassment, TEQSA can assess if, when, and how students are informed.

Many independent and TAFE higher education providers, on the other hand, require more support. The providers that TEQSA has spoken to are seeking information, education and training that are suited to their needs. Many independent and TAFE higher education providers are also interested in advice and guidance about connecting with counselling services and emergency sexual assault services in particular.

The following section explains in detail what TEQSA will do to support the higher education sector to tackle this issue.

6. What TEQSA will do

In addition to the analysis provided in this report, TEQSA will look for evidence to confirm that each provider is taking action to prevent and reduce the incidence of sexual assault and sexual harassment, and to respond to and support the victims of sexual assault and sexual harassment. For this reason, TEQSA staff have undertaken 'Sex, Safety and Respect' training by the Full Stop Foundation to increase their knowledge and understanding of the issue of sexual assault and sexual harassment. The training also included information about a framework for ethical consent and bystander practices.

Sexual assault and sexual harassment are complex and sensitive issues and TEQSA is limited in its ability to address the drivers, which include violence-supportive attitudes, and attitudes related to gender and sexuality. TEQSA can, however, respond to complaints about providers; monitor the higher education sector and provide assurance that providers are doing what they say they are doing; and offer guidance and support to providers who want or need to do more.

The objectives of TEQSA's work on sexual assault and sexual harassment in the higher education sector are to:

- receive and respond to complaints about providers' responses to incidents of sexual assault and sexual harassment

- test and assure the information that providers have given TEQSA regarding their actions to tackle the issue

- support providers to implement actions that will ensure the wellbeing and safety of students by providing advice and sharing good practice.

6.1   Complaints

Section 2.4 (Student Grievances and Complaints) of the HES Framework, requires providers to establish mechanisms to resolve grievances, implement policies and processes to respond to complaints, and communicate with the student during the process. TEQSA does not assess the validity or investigate individual allegations of sexual assault and sexual harassment. Rather, TEQSA considers the way in which providers implement complaints policies and procedures, and respond to students in the investigation and resolution of grievances.

In TEQSA's experience, complaints about sexual assault and sexual harassment frequently involve a tension between the right to education, the need to afford due process, and the need to ensure the wellbeing and safety of students.

Since September 2017, TEQSA has received a small number of complaints about how providers have responded to reports of sexual assault and sexual harassment. TEQSA's Compliance and Investigations Team has responsibility for handling complaints, including complaints in relation to sexual assault and sexual harassment. For this reason, TEQSA employs staff with experience in responding to victims of sexual assault. TEQSA staff have also undertaken complaints training conducted by the NSW Ombudsman.

When TEQSA considers a complaint, the agency seeks further information from complainants and providers. Where necessary, TEQSA conducts visits to providers and interviews their senior staff. TEQSA's direct intervention has resulted in further action by providers to address the matter to the satisfaction of complainants.

In addition to complaints, TEQSA considers media reports and other intelligence about sexual assault and sexual harassment at higher education providers. Where there is sufficient information, TEQSA may record and assess the matter as if it were a complaint.

6.2   Assessment and assurance

Higher education providers apply to TEQSA for renewal of registration on a cyclical basis. During this process, applicants are required to submit evidence relating to a core set of standards[3]. The core standards include section 2.3 of the HES Framework (Wellbeing and safety). TEQSA assesses how providers ensure the wellbeing and safety of students in general, and also with particular reference to their approach to sexual assault and sexual harassment. TEQSA considers the evidence presented by the provider, which should include any reviews of policy and pathways established to manage the provider's response to the issue of sexual assault and sexual harassment, and any reviews of counselling services or student accommodation. The types of evidence that TEQSA will look for, in relation to addressing sexual assault and sexual harassment, are based on the primary purpose of ensuring that providers continue to meet the HES Framework's requirements and will draw on the AHRC's recommendations and the UA Guidelines. The types of evidence are listed below in Table 1.

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[3] Some providers are asked to submit evidence against other selected standards on a case-by-case basis.

Table 1. Provider implementation of measures to prevent and respond to sexual assault and sexual harassment

Question	Evidence
Is the provider showing leadership on this issue?	✓ The University has adopted the *Change the Course* report's recommendations (Universities only) ✓ A taskforce has been established ✓ The Vice-Chancellor/CEO is leading the taskforce
Is the provider actively training and informing staff and students?	✓ Education and awareness programs are in place ✓ Online training programs are provided ✓ Face to face seminars or training are provided
Has the provider established good governance to respond to sexual assault and sexual harassment (SASH)?	✓ Freestanding policy on sexual assault and sexual harassment ✓ Reviews of SASH policies and procedures, counselling services and student accommodation have been conducted, and action plans put in place ✓ Students know how to report, what to expect, where to find support, and how to make a complaint ✓ The provider delivers timely responses to students (observed through complaints)
Do SASH victims and perpetrators have access to support?	✓ Counselling services are provided ✓ The provider is collaborating with an external sexual assault service provider to provide acute response services ✓ A safe environment is provided and security offer a safe escort service
How is the provider managing information and data on this issue?	✓ Reviews are publicly available ✓ Incident data is internally reported ✓ Incident data is publicly reported (not necessary, but indicative of transparency)

The process of renewal of registration is an important element in TEQSA's work in determining how providers are responding to the issue of sexual assault and sexual harassment. The information provided to TEQSA in order to undertake this analysis must be tested and assured as part of the renewal of registration process. Further information may be required, and the renewal of registration process enables a deeper, more granular evaluation of the evidence that a provider submits to TEQSA.

6.3   Guidance and support

In January 2018, TEQSA published its *Guidance Note: Wellbeing and Safety*, which is intended to give higher education providers clarity on their legislative requirements to foster a safe environment for students – both on campus and online. Stakeholders that contributed to the development of the guidance note included advocacy groups, providers, and students.

The guidance note advises that: 'providers [are required] to provide timely and accurate advice on access to student support services and to promote and foster a safe environment on campus and online'. Further, 'even incidents that fall outside the scope of the provider's operations may have adverse impacts on subsequent educational experiences (e.g. an unwelcome approach from a fellow student at a private weekend function) and the provider may need to ensure support is available'.

In October 2017, TEQSA also published its *Guidance Note: Grievance and Complaint Handling*. This guidance note relates to section 2.4 of the HES Framework, and its purpose is to offer guidance to providers on TEQSA's expectations about the way in which providers achieve resolution of grievances.

In 2019 TEQSA will look to establish an advisory group and work with experts in sexual assault and sexual harassment to prepare a good practice note. TEQSA's good practice notes are intended to offer practical advice and examples of good practice to guide

providers' operations in regard to specific higher education issues and are a way for the agency to support and promote quality assurance approaches across the sector.

6.4   Working with experts and stakeholder groups

TEQSA has been working with experts in the field of sexual assault and sexual harassment to develop staff knowledge and facilitate support for student complainants. In July 2018, TEQSA held two workshops with 25 experts with different perspectives to develop a 'systems analysis' of the issue of sexual assault and sexual harassment in the higher education sector. To better understand the provider responses to this complex and sensitive issue, TEQSA has analysed the influences on higher education providers and the different organisational units within each provider.

The systems analysis has been useful to identify the forces in the higher education system that account for the current levels of, and current institutional response to, sexual assault and sexual harassment. Leadership is a key force at the centre of the system, and is the most influential lever that can be pulled to effect change. The leadership of each provider decides how the institution will respond to the issue of sexual assault and sexual harassment and the resources that will be committed to it. The capacity of the provider to respond depends on those decisions and the influences that inform the leadership. Some of those influences enable, and some limit, the ability of the provider to respond to the issues of sexual assault and sexual harassment. Education, training and information, institutional capacity, and institutional response are other key levers for creating change. A provider's fulsome response may also include the following topics, all offering further potential levers for change:

- data reporting, monitoring and evaluation
- curriculum
- clear, well-informed policies and procedures
- good governance
- complaint management
- academic support
- counselling and other support services.

In addition to working broadly with experts, TEQSA also meets with the peak bodies, advocacy groups and non-government organisations (i.e. End Rape on Campus, Fair Agenda, Hunting Ground Australia, University Colleges Australia, Asia-Pacific Student Accommodation Australia) to discuss the issue of sexual assault and sexual harassment, and how providers are managing the issue. As mentioned above, TEQSA will look to establish an advisory group to develop a good practice note in 2019.

Appendix 1 – Methodology

Initial responses from the universities to the former Minister for Education's letter from August 2017 were dated between August and November 2017. In December 2017, TEQSA provided the Minister with a high level overview of the responses of the universities. In February 2018, TEQSA sent a letter to all independent and TAFE higher education providers requesting information about how risks regarding sexual assault and sexual harassment were being managed by each organisation. TEQSA received responses from these providers between March and July 2018.

Based on the *Change the Course* recommendations, TEQSA developed a checklist of what to look for in each response (Table 2). The checklist represented aspects of each of the nine recommendations. The results against the checklist were recorded in a Microsoft Excel database, which also included qualitative information such as hyperlinks, and captured comments of the providers. The checklist covered: leadership and governance; changing attitudes and behaviours; procedures for responding; monitoring and evaluation; and residential colleges and student accommodation. In order to obtain information that was not evident in providers' responses, TEQSA also reviewed the website of each provider between March and July 2018. Although TEQSA observed examples of responses that appeared to go beyond the AHRC's recommendations, the agency was not looking to identify examples of good practice for this report. However, as noted in Section 6, with the help of an advisory panel, TEQSA will prepare a good practice note in 2019 to highlight such examples.

TEQSA commenced its analysis in April 2018. In October 2018, TEQSA provided universities with a template of a subset of the checklist and asked them to update their responses, or to complete any gaps, prior to finalising its analysis in November 2018.

TEQSA assessed 42 universities and 126 independent and TAFE higher education providers. At the time of the analysis, there were 43 universities and 125 independent and TAFE higher education providers recorded on the National Register of Higher Education Providers. University College London is in teach out and has only two students in Australia, and it was not included in the assessment. Three providers did not provide a response, despite follow up. Study Group Australia Pty Ltd, Kaplan Business School Pty Ltd and Kaplan Higher Education Pty Ltd are registered providers that operate multiple distinct higher education businesses, and each business was assessed separately. This accounts for the number of higher education businesses assessed being larger than the number of independent and TAFE higher education providers registered at the time[4,5]. TEQSA did not analyse third party providers that are not registered in the provider category of Higher Education Provider.

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[4] Study Group Australia provided one response covering three of its businesses (Taylors College Perth, Flinders International Study Centre and Martin Higher Education) and a separate response from ANU College. TEQSA then assessed its fifth business, Taylor's College Sydney, based on its website.

[5] Kaplan Business School Pty Ltd and Kaplan Higher Education Pty Ltd provided a combined response, however TEQSA assessed the four businesses operated by those entities separately (Kaplan Business School, Kaplan Professional Education, Murdoch Institute of Technology and the University of Adelaide College).

Table 2. Checklist used during the analysis of provider responses and their websites

1. **Leadership and Governance**
   Adoption of *Change the Course* recommendations
   - Task force/working group
   - Name of task force
   - Led by
   - Name of leader
   - Function/ activities of task force
   - Representation
   Review of SASH
   - Name of review
   - Due for completion
   - Name of reviewer
   SASH response policies and procedures
   - Free standing SA policy
   - Free standing SH policy
   - SASH together in one policy
   - As part of another policy (e.g. OHS)
   - PG student/staff policy
   - Incident procedure
   - Misconduct procedure
   - Police referral

2. **Education and Information**
   - *Respect. Now. Always*
   - Ally Program
   - Other website
   - Other website 2
   - App
   - Online safety information
   - Face to face education / information

3. **Training**
   Consent Matters
   - Mandatory participation
   - Staff
   - Students
   - Student leaders
   - Security personnel
   - Support services
   Other online
   - Mandatory participation
   - Staff
   - Students
   - Student leaders
   - Security personnel
   - Support services
   Face to face
   - Mandatory participation
   - Staff
   - Students
   - Student leaders
   - Security personnel
   - Support services
   Other Offline
   - Mandatory participation
   - Staff
   - Students
   - Student leaders
   - Security personnel

4. **Student Support Services**
   Security
   - Security contact details
   - Safe escort contact
   - Safe environment
   Counselling
   - Internal counselling service
   - External counselling provider
   - Emergency sexual assault service
   - Partnership with external SASH services
   - Student wellbeing policy

5. **Monitoring and Evaluation**
   SASH survey
   - Interval of survey
   - Name of survey
   SASH initiatives mentioned in Annual Report
   - Incident reporting
   - Evidence of public reporting
   - Evidence of internal reporting of incident
   - Senior manager can decide if report should be investigated
   - Evidence of Monitoring of student services

6. **Media Reports**
   - Media report A
   - Media report B

7. **Residential Colleges and Private Student Accommodation**
   - Residential colleges
   - Private accommodation
   - Review of residential colleges

8. **Sources of Data used for evaluation**
   - Provider's response to letters
   - Website
   - Review
   - Media
   - UA 10 point plan
   - AHRC audit 2018
   - CC survey results
   - Red Zone Report by EROC

9. **Findings**
   - Conclusion
   - Excuse provided
   - Overview and comments for case manager
   - Link to summary document

10. **Good Practice**
    Examples of good practice

Appendix 2 – University responses to key measures

Universities	Leadership and Governance								Changing attitudes and behaviours		Procedures for responding					Monitoring and evaluation		Residential colleges
	The provider has adopted the *Change the Course* recommendations	A taskforce has been established	The VC/CEO is leading the taskforce	A policy on sexual assault and sexual harassment exists	A standalone SASH policy exists	A standalone policy on sexual assault exists	A standalone policy on sexual harassment exists	A review of SASH policies and procedures is complete	Online training is available	Face to face seminars or training is provided	Internal counselling is available	A review of counselling services is complete	Collaboration with an external sexual assault service provider	SASH specific emergency contact information is provided	Safe escort service contact details are provided	Incident data is internally reported	Incident data is publicly reported	A review of student accommodation is complete
University total number	40	42	10	39	12	6	5	39	39	39	42	29	40	41	36	42	9	29
University total per cent	95	100	24	93	29	14	12	93	93	93	100	69	95	98	86	100	21	69
Australian Catholic University	✓	✓		✓	✓			✓		✓	✓		✓	✓	✓	✓		✓
Australian National University	✓	✓		✓				✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Bond University	✓	✓						✓	✓	✓	✓	✓	✓	✓	✓	✓		
Carnegie Mellon University	✓	✓		✓	✓			✓		✓	✓		✓	✓		✓	✓	
Central Queensland University	✓	✓		✓				✓	✓	✓	✓		✓	✓		✓		✓
Charles Darwin University		✓		✓	✓			✓	✓	✓	✓		✓	✓		✓	✓	
Charles Sturt University	✓	✓		✓				✓	✓	✓	✓		✓	✓	✓	✓		✓
Curtin University	✓	✓						✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	
Deakin University	✓	✓	✓	✓		✓		✓	✓	✓	✓	✓	✓	✓	✓	✓		✓
Edith Cowan University	✓	✓		✓				✓	✓	✓	✓	✓	✓	✓	✓	✓		✓
Federation University Australia	✓	✓		✓				✓	✓	✓	✓	✓	✓	✓	✓	✓		
Flinders University	✓	✓			✓			✓	✓	✓	✓		✓	✓	✓	✓		
Griffith University	✓	✓		✓				✓	✓	✓	✓	✓	✓	✓	✓	✓		✓
James Cook University	✓	✓	✓	✓		✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		✓
La Trobe University	✓	✓	✓	✓	✓	✓		✓	✓	✓	✓	✓	✓	✓	✓	✓		✓

Universities	The provider has adopted the Change the Course recommendations	A taskforce has been established	The VC/CEO is leading the taskforce	A policy on sexual assault and sexual harassment exists	A standalone SASH policy exists	A standalone policy on sexual assault exists	A standalone policy on sexual harassment exists	A review of SASH policies and procedures is complete	Online training is available	Face to face seminars or training is provided	Internal counselling is available	A review of counselling services is complete	Collaboration with an external sexual assault service provider	SASH specific emergency contact information is provided	Safe escort service contact details are provided	Incident data is internally reported	Incident data is publicly reported	A review of student accommodation is complete
University total number	40	42	10	39	12	6	5	39	39	39	42	29	40	41	36	42	9	29
University total per cent	95	100	24	93	29	14	12	93	93	93	100	69	95	98	86	100	21	69
Macquarie University	✓	✓	✓	✓				✓	✓	✓	✓	✓	✓	✓	✓	✓		✓
Monash University	✓	✓	✓	✓				✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Murdoch University	✓	✓	✓						✓	✓	✓		✓	✓	✓	✓		✓
Qld Uni of Technology	✓	✓		✓				✓	✓	✓	✓	✓	✓	✓	✓	✓		
Royal Melb Inst of Technology	✓	✓		✓			✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		✓
Southern Cross University		✓		✓				✓	✓	✓	✓		✓		✓	✓		✓
Swinburne Uni of Technology	✓	✓		✓				✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	
The University of Adelaide	✓	✓		✓				✓	✓	✓	✓	✓	✓	✓	✓	✓		✓
The University of Melbourne	✓	✓		✓				✓	✓	✓	✓		✓	✓	✓	✓		✓
The University of Notre Dame	✓	✓		✓	✓			✓			✓		✓	✓	✓	✓		
The University of Queensland	✓	✓		✓		✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		✓
The University of Sydney	✓	✓		✓	✓			✓	✓	✓	✓		✓		✓	✓		✓
The University of Western Aus	✓	✓		✓	✓			✓	✓	✓	✓	✓	✓	✓	✓	✓		✓
Torrens University Australia	✓	✓		✓	✓			✓	✓	✓	✓					✓		✓
University of Canberra	✓	✓		✓				✓	✓	✓	✓		✓	✓	✓	✓	✓	✓
University of Divinity	✓	✓	✓	✓				✓			✓					✓		
University of New England	✓	✓	✓	✓				✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
University of NSW	✓	✓		✓	✓			✓	✓	✓	✓	✓	✓	✓	✓	✓		✓

Note: Information correct as of November 2018. View the updated version of this table.

Universities	Leadership and Governance								Changing attitudes and behaviours		Procedures for responding					Monitoring and evaluation		Residential colleges
	The provider has adopted the *Change the Course* recommendations	A taskforce has been established	The VC/CEO is leading the taskforce	A policy on sexual assault and sexual harassment exists	A standalone SASH policy exists	A standalone policy on sexual assault exists	A standalone policy on sexual harassment exists	A review of SASH policies and procedures is complete	Online training is available	Face to face seminars or training is provided	Internal counselling is available	A review of counselling services is complete	Collaboration with an external sexual assault service provider	SASH specific emergency contact information is provided	Safe escort service contact details are provided	Incident data is internally reported	Incident data is publicly reported	A review of student accommodation is complete
University total number	40	42	10	39	12	6	5	39	39	39	42	29	40	41	36	42	9	29
University total per cent	95	100	24	93	29	14	12	93	93	93	100	69	95	98	86	100	21	69
University of Newcastle	✓	✓		✓	✓			✓	✓	✓	✓	✓	✓	✓	✓	✓		✓
University of South Australia	✓	✓		✓	✓			✓	✓	✓	✓	✓	✓	✓	✓	✓		✓
University of Sthn Queensland	✓	✓		✓				✓	✓	✓	✓	✓	✓	✓	✓	✓		✓
University of Tasmania	✓	✓		✓				✓	✓	✓	✓	✓	✓	✓	✓	✓		✓
University Technology Sydney	✓	✓		✓				✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
University Sunshine Coast	✓	✓		✓	✓			✓	✓	✓	✓	✓	✓	✓	✓	✓		
University of Wollongong	✓	✓		✓	✓			✓	✓	✓	✓	✓	✓	✓	✓	✓		✓
Victoria University	✓	✓	✓	✓		✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
Western Sydney University	✓	✓	✓	✓		✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		✓

Note: Information correct as of November 2018. View the updated version of this table.

Note: Information correct as of November 2018. View the updated version of this table.

Independent and TAFE higher education providers	Leadership and Governance						Changing attitudes & behaviours		Procedures for responding						Monitoring and evaluation		Residential colleges
	A taskforce has been established	The VC/CEO is leading the taskforce	A policy on sexual assault and sexual harassment exists	A standalone SASH policy exists	A standalone policy on sexual harassment exists	A review of SASH policies & procedures is complete	Online training is available	Face to face seminars or training provided	Internal counselling is available	External counselling is available	No counselling is available	Collaboration with an external sexual assault service provider	SASH specific emergency contact info provided	Safe escort service contact details are provided	Incident data is internally reported	Incident data is publicly reported	A review of student accommodation is complete
Independent and TAFE higher education providers total number	30	3	73	7	12	20	16	52	59	44	31	10	20	11	47	1	1
Independent and TAFE higher education providers total per cent	24	2	58	6	10	16	13	41	47	35	25	8	16	9	37	1	1
Academies Australasia Polytechnic	✓	✓	✓					✓	✓								
Academy of Design Australia										✓							
Academy of Information Technology								✓		✓							
Acknowledge Education			✓						✓								
ACPE Limited	✓		✓						✓								
Adelaide Central School of Art			✓		✓			✓	✓								
Adelaide College of Divinity			✓					✓	✓								
Alphacrucis College	✓		✓	✓		✓			✓			✓					
Asia Pacific International College			✓						✓								
Australian Academy of Music and Performing Arts										✓							
Australian College of Christian Studies										✓							
Australian College of Natural Medicine	✓		✓		✓		✓			✓							
Australian College of Nursing										✓							
Australian College of the Arts									✓								

Note: Information correct as of November 2018. View the updated version of this table.

Independent and TAFE higher education providers	Leadership and Governance						Changing attitudes & behaviours		Procedures for responding						Monitoring and evaluation		Residential colleges
	A taskforce has been established	The VC/CEO is leading the taskforce	A policy on sexual assault and sexual harassment exists	A standalone SASH policy exists	A standalone policy on sexual harassment exists	A review of SASH policies & procedures is complete	Online training is available	Face to face seminars or training provided	Internal counselling is available	External counselling is available	No counselling is available	Collaboration with an external sexual assault service provider	SASH specific emergency contact info provided	Safe escort service contact details are provided	Incident data is internally reported	Incident data is publicly reported	A review of student accommodation is complete
Independent and TAFE higher education providers total number	30	3	73	7	12	20	16	52	59	44	31	10	20	11	47	1	1
Independent and TAFE higher education providers total per cent	24	2	58	6	10	16	13	41	47	35	25	8	16	9	37	1	1
Australian College of Theology											✓						
Australian Film, Television and Radio School	✓									✓							
Australian Guild of Music Education										✓							
Australian Institute of Business and Management			✓	✓				✓	✓								
Australian Institute of Business								✓		✓							
Australian Institute of Higher Education			✓							✓							
Australian Institute of Management Education and Training			✓	✓						✓							
Australian Institute of Professional Counsellors										✓							
Avondale College	✓	✓	✓					✓	✓								
Batchelor Institute of Indigenous Tertiary Education			✓		✓			✓		✓							
BBI The Australian Institute of Theological Education			✓							✓			✓				
Box Hill Institute			✓				✓	✓	✓						✓		
Campion Institute			✓			✓			✓						✓		
Canberra Institute of Technology	✓	✓	✓			✓		✓	✓			✓	✓	✓	✓		
Centre for Pavement Engineering Education										✓							
Chartered Accountants Australia and New Zealand	✓		✓							✓							
Chisholm Institute							✓		✓						✓		

Note: Information correct as of November 2018. View the updated version of this table.

Independent and TAFE higher education providers	Leadership and Governance						Changing attitudes & behaviours		Procedures for responding						Monitoring and evaluation		Residential colleges
	A taskforce has been established	The VC/CEO is leading the taskforce	A policy on sexual assault and sexual harassment exists	A standalone SASH policy exists	A standalone policy on sexual harassment exists	A review of SASH policies & procedures is complete	Online training is available	Face to face seminars or training provided	Internal counselling is available	External counselling is available	No counselling is available	Collaboration with an external sexual assault service provider	SASH specific emergency contact info provided	Safe escort service contact details are provided	Incident data is internally reported	Incident data is publicly reported	A review of student accommodation is complete
Independent and TAFE higher education providers total number	30	3	73	7	12	20	16	52	59	44	31	10	20	11	47	1	1
Independent and TAFE higher education providers total per cent	24	2	58	6	10	16	13	41	47	35	25	8	16	9	37	1	1
Christian Heritage College			✓					✓	✓				✓		✓		
CIC Higher Education			✓						✓								
Colleges of Business and Technology (WA)	✓		✓		✓			✓	✓	✓					✓		
Commissioner of the Australian Federal Police			✓							✓					✓		
Commonwealth of Australia								✓			✓						
Eastern Health			✓		✓					✓							
Edith Cowan College	✓		✓		✓			✓	✓						✓	✓	✓
Educational Enterprises Australia	✓		✓							✓					✓		
Elite Education Institute										✓			✓				
Engineering Institute of Technology			✓		✓					✓							
Excelsia College			✓					✓	✓								
Gestalt Therapy Brisbane			✓							✓							
Governance Institute of Australia										✓							
Group Colleges Australia										✓							
Health Education and Training Institute			✓						✓				✓		✓		
Higher Education Leadership Institute										✓							
Holmes Institute									✓				✓				
Holmesglen Institute			✓		✓		✓	✓	✓			✓	✓		✓		

Note: Information correct as of November 2018. View the updated version of this table.

Independent and TAFE higher education providers	Leadership and Governance						Changing attitudes & behaviours		Procedures for responding						Monitoring and evaluation		Residential colleges
	A taskforce has been established	The VC/CEO is leading the taskforce	A policy on sexual assault and sexual harassment exists	A standalone SASH policy exists	A standalone policy on sexual harassment exists	A review of SASH policies & procedures is complete	Online training is available	Face to face seminars or training provided	Internal counselling is available	External counselling is available	No counselling is available	Collaboration with an external sexual assault service provider	SASH specific emergency contact info provided	Safe escort service contact details are provided	Incident data is internally reported	Incident data is publicly reported	A review of student accommodation is complete
Independent and TAFE higher education providers total number	30	3	73	7	12	20	16	52	59	44	31	10	20	11	47	1	1
Independent and TAFE higher education providers total per cent	24	2	58	6	10	16	13	41	47	35	25	8	16	9	37	1	1
ICHM	✓					✓			✓			✓			✓		
INSEARCH								✓		✓					✓		
Institute for Emotionally Focused Therapy											✓				✓		
Institute of Health & Management			✓	✓					✓	✓					✓		
International College of Management, Sydney	✓					✓	✓		✓	✓					✓		✓
International Institute of Business and Technology			✓							✓							
ISN Psychology			✓	✓					✓								
Jazz Music Institute										✓							
JMC								✓		✓					✓		
John Paul II Institute for Marriage and Family, Melbourne			✓		✓		✓		✓						✓		
Kaplan Business School			✓					✓		✓							
Kaplan Higher Ed (Kaplan Professional)			✓					✓		✓							
Kaplan Higher Ed (Murdoch Institute)			✓					✓	✓					✓			
Kaplan Higher Ed (Uni of Adelaide College)			✓					✓		✓			✓	✓			
Kent Institute Australia			✓			✓		✓	✓						✓		
Kollel Academy of Advanced Jewish Education											✓						
Le Cordon Bleu Australia	✓					✓	✓	✓	✓			✓			✓		

Independent and TAFE higher education providers	Leadership and Governance						Changing attitudes & behaviours		Procedures for responding						Monitoring and evaluation		Residential colleges
	A taskforce has been established	The VC/CEO is leading the taskforce	A policy on sexual assault and sexual harassment exists	A standalone SASH policy exists	A standalone policy on sexual harassment exists	A review of SASH policies & procedures is complete	Online training is available	Face to face seminars or training provided	Internal counselling is available	External counselling is available	No counselling is available	Collaboration with an external sexual assault service provider	SASH specific emergency contact info provided	Safe escort service contact details are provided	Incident data is internally reported	Incident data is publicly reported	A review of student accommodation is complete
Independent and TAFE higher education providers total number	30	3	73	7	12	20	16	52	59	44	31	10	20	11	47	1	1
Independent and TAFE higher education providers total per cent	24	2	58	6	10	16	13	41	47	35	25	8	16	9	37	1	1
Leo Cussen Institute			✓					✓			✓				✓		
Macleay College								✓	✓								
Marcus Oldham College			✓		✓		✓	✓	✓						✓		
Mayfield Education			✓					✓		✓					✓		
Melbourne Institute of Business and Technology	✓		✓			✓	✓		✓	✓				✓	✓		
Melbourne Institute of Technology	✓		✓				✓	✓	✓	✓		✓	✓		✓		
Melbourne Polytechnic			✓						✓								
Monash College			✓				✓	✓	✓			✓	✓		✓		
Montessori World Educational Institute										✓							
Moore Theological College Council			✓		✓				✓								
Morling College			✓						✓						✓		
Nan Tien Institute Limited										✓							
National Art School	✓					✓		✓	✓								
National Institute of Organisation Dynamics Australia			✓		✓					✓					✓		
Navitas Bundoora										✓				✓			
Navitas Professional Institute	✓		✓						✓				✓		✓		
Newcastle International College	✓		✓				✓		✓	✓					✓		

Note: Information correct as of November 2018. View the updated version of this table.

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Independent and TAFE higher education providers	Leadership and Governance						Changing attitudes & behaviours		Procedures for responding						Monitoring and evaluation		Residential colleges
	A taskforce has been established	The VC/CEO is leading the taskforce	A policy on sexual assault and sexual harassment exists	A standalone SASH policy exists	A standalone policy on sexual harassment exists	A review of SASH policies & procedures is complete	Online training is available	Face to face seminars or training provided	Internal counselling is available	External counselling is available	No counselling is available	Collaboration with an external sexual assault service provider	SASH specific emergency contact info provided	Safe escort service contact details are provided	Incident data is internally reported	Incident data is publicly reported	A review of student accommodation is complete
Independent and TAFE higher education providers total number	30	3	73	7	12	20	16	52	59	44	31	10	20	11	47	1	1
Independent and TAFE higher education providers total per cent	24	2	58	6	10	16	13	41	47	35	25	8	16	9	37	1	1
North Metropolitan TAFE										✓			✓				
Ozford Institute of Higher Education			✓							✓							
ParaPharm			✓		✓					✓					✓		
Perth Bible College										✓							
Photography Holdings			✓		✓	✓				✓							
Polytechnic Institute Australia	✓		✓			✓		✓		✓							
Proteus Technologies			✓							✓							
Queensland Institute of Business & Technology	✓		✓			✓	✓	✓	✓	✓					✓		
Raffles College			✓						✓		✓						
Russo Business School									✓		✓						
S P Jain School of Global Management			✓						✓	✓					✓		
SAE Institute	✓								✓				✓		✓		
Sheridan College									✓	✓							
South Australian Institute of Business and Technology	✓		✓						✓	✓		✓			✓	✓	
South Metropolitan TAFE											✓						
Southern Cross Education Institute			✓	✓					✓								
Study Group Australia (Taylor College, Sydney)									✓	✓							

Note: Information correct as of November 2018. View the updated version of this table.

Independent and TAFE higher education providers	Leadership and Governance						Changing attitudes & behaviours		Procedures for responding						Monitoring and evaluation		Residential colleges
	A taskforce has been established	The VC/CEO is leading the taskforce	A policy on sexual assault and sexual harassment exists	A standalone SASH policy exists	A standalone policy on sexual harassment exists	A review of SASH policies & procedures is complete	Online training is available	Face to face seminars or training provided	Internal counselling is available	External counselling is available	No counselling is available	Collaboration with an external sexual assault service provider	SASH specific emergency contact info provided	Safe escort service contact details are provided	Incident data is internally reported	Incident data is publicly reported	A review of student accommodation is complete
Independent and TAFE higher education providers total number	30	3	73	7	12	20	16	52	59	44	31	10	20	11	47	1	1
Independent and TAFE higher education providers total per cent	24	2	58	6	10	16	13	41	47	35	25	8	16	9	37	1	1
Study Group Australia (Martin HE, Taylor CP, Flinders ISC)	✓									✓					✓		
Study Group Australia (ANU College)									✓								
Sydney College of Divinity										✓							
Sydney Institute of Business and Technology	✓		✓					✓	✓			✓			✓		
Sydney Institute of Health Sciences						✓		✓		✓			✓		✓	✓	
Tabor College	✓							✓	✓						✓		
TAFE Queensland			✓	✓					✓					✓	✓		
TAFE SA			✓		✓				✓	✓			✓		✓		
Technical and Further Education Commission									✓	✓							
The Australasian College of Dermatologists	✓		✓							✓							
The Australian Council for Educational Research										✓							
The Australian Institute of Music						✓		✓		✓		✓					
The Cairnmillar Institute			✓							✓					✓		
The College of Law						✓				✓					✓		
The Institute of Internal Auditors-Australia											✓						
The Institute of International Studies											✓		✓				
The MIECAT Institute									✓								

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Independent and TAFE higher education providers	Leadership and Governance						Changing attitudes & behaviours		Procedures for responding						Monitoring and evaluation		Residential colleges
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The National Institute of Dramatic Art			✓				✓	✓		✓				✓	✓		
The Tax Institute			✓							✓							
Think: Colleges			✓					✓				✓			✓		
Top Education Group	✓		✓					✓	✓	✓				✓			
UOWC	✓		✓				✓	✓	✓	✓		✓		✓			
Victorian Institute of Technology			✓		✓					✓				✓	✓		
Wentworth Institute of Higher Education			✓		✓					✓					✓		
Western Sydney Uni International College	✓						✓	✓	✓						✓		
William Angliss Institute of TAFE								✓	✓								

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