



Creston
College

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

**National Higher Education Code
to Prevent and Respond to Gender-based Violence**



Provider name:	Creston College
Higher Education Principal Executive Officer name and position:	Dr Patricia Grant, Head of College
Plan period:	1 January 2026 to 31 December 2030

1. Executive Summary

This Whole-of-Organisation Assessment has been prepared in accordance with Standard 7 of the National Education Code to Prevent and Respond to Gender-based Violence (National Code). Creston College, affiliated with the University of New South Wales, is committed to creating a safe, inclusive, and respectful environment for all residents, staff, visitors and other stakeholders.

This assessment identifies systemic risks, enablers and barriers across key operational areas, including leadership governance, culture, policies, service delivery and systems. Given Creston is a small women's college of less than 25 residents, it draws mainly on the experience of the all-female staff who have reviewed the college mission, culture, practices, policies and procedures and past experience of more than 50 years of operation.

Key findings point to the College's commitment to gender equality. Enablers include the College mission of promotion of the dignity of every human being and in particular women and accompanying activities, mentoring programmes, and a home-away-from-home supportive environment.

Creston will introduce training for staff and students, document existing practices with policies and procedures, strengthen measuring and reporting mechanisms.

2. Provider overview: About the College

Creston College is a residential college affiliated with the University of New South Wales. It provides accommodation to up to 24 undergraduate and postgraduate women students of all denominations and nationalities.

Creston College is also a centre for learning and leadership. A variety of courses and activities designed to meet the needs and aspirations of women of this generation are organised for residents and non-residents alike. These projects are conducted within a framework of appreciation of past achievements and the encouragement of service, learning and research to promote a more humane world.

Creston College was founded in 1970 as a project of Foundation for Education & Training Limited (FFET), which aims to promote education and the development of character in accordance with the principles and ideals of Christianity.

Creston College was established from the beginning as a college for female students of all nationalities and denominations. In 1969, the first Creston Residence opened its doors to only a handful of students in their temporary location on Prince Street, Randwick. Operations in the current premises at 36 High Street began on August 17th, 1970, facilitating intake to a full capacity of 25 residents. Through the years, contributing to the vibrant college environment are the numerous non-resident students who use Creston’s facilities and participate in the academic, cultural, spiritual and sporting activities organised by the College.

3.Planning, engagement, evidence and action

This Whole-of-Organisation Assessment provides a clear and evidence-informed overview of Creston College's strengths, challenges and areas for improvement in relation to preventing gender-based violence and supporting disclosers and respondents. These are presented as enablers, risks and barriers in accordance with the language used in the National Code. This assessment identifies areas of operation relevant to Creston College as they may align with areas defined in the National Code.

LEADERSHIP, CULTURE AND ENVIRONMENT

Enablers	<ul style="list-style-type: none"> - Christian focussed mission and culture which emphasises respect for <i>every human being</i> and the mutual respect between partners before and after marriage. - Positive relationship between staff and students - Experienced pastoral care team with a range of expertise including anthropology, psychology, education and counselling. - Strong relationships with residents as evidenced by regular meetings between staff and resident tutors and student leaders. - Close monitoring of culture through regular feedback from students - Ability to intervene early as staff live on site. - All students upon acceptance of a place at the College includes <i>signing a pledge to uphold the policies and values of the College.</i> - Culture of female empowerment-Formal Dinner Speakers, events. - Safety focussed policies regarding such behaviour as bullying and the use of drugs and alcohol, health and safety. - High retention rate of residents and eagerness to take on leadership roles in the College. - Residents can only have guests in common areas
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Systemic risks	<ul style="list-style-type: none"> - Residents accepting invitations to other locations without assessing risks.
Barriers	<ul style="list-style-type: none"> - None identified
Key actions in response	<ul style="list-style-type: none"> - Conduct mandatory annual training for staff and students on GBV and respectful relationships which will include education on recognising early warning signs and responding promptly to prevent harm-emphasising high-risk situation of invitations to other locations. - Update induction programmes, Dean's website message, policies and procedures encapsulating our commitment to the Code. - Review guest registration protocol and reinforce messaging to students
Evidence	<ul style="list-style-type: none"> - Website - College Policies & Procedures - Student guidebook - Induction documents - Agenda and minutes of Management and House Committee Meetings

STRUCTURES, NORMS AND PRACTICES

Enablers	<ul style="list-style-type: none"> - Christian focused mission and culture which emphasises respect for every human being and the mutual respect between partners before and after marriage. - Student/Staff Code of Conduct, the Website, the interview and the acceptance contract emphasise this Christian focused mission and culture - On going dialogue between staff and residents. - Any resident or staff member can make a formal report, and it will be, and has been, taken seriously - grievance officers, grievance and complaints policy
System risks	<ul style="list-style-type: none"> - Residents accepting invitations to other locations without assessing risks.
Barriers	<ul style="list-style-type: none"> - None identified

SYSTEMS AND INFRASTRUCTURE

Entry to the College is only through the main door. This is always locked and can be accessed by ringing a doorbell. The back door is locked and the catering entrance locked when not in use.

College staff are present on site 24/7. Reception is formally staffed from 8am to 4pm on weekdays. After 4 and on weekends senior residents/staff are responsible for reception. During any night a resident just needs to message via mobile a senior resident/staff member to gain entry to the College.

Each resident has a key to their bedroom door.

Residents can only have male guests and romantic partners in common areas on the ground floor.

Guest registration

Residents are not permitted to sleep in another resident's bedroom.

The College grounds are fully fenced. There is a back gate which is locked. The front gate leading on to High Street is open during the day but on weekends and at night can be opened electronically from within the College once the person is identified.

Enablers	<ul style="list-style-type: none"> - Staff live on site - Staff/student on call during the night reports any experiences experienced - Only staff have access to College systems.
System risks	<ul style="list-style-type: none"> - Guest registration-not always done - Front gate -not always locked on weekends/evenings - Back door/gate -not always locked.
Barriers	<ul style="list-style-type: none"> - None identified
Key actions in response	<ul style="list-style-type: none"> - Investigate and review guest registration protocols - Review front gate/back door/gate protocols
Evidence	<ul style="list-style-type: none"> - screenshot of registration book (respecting privacy) - updated front gate/back door/gate protocols

SERVICE DELIVERY

The College provides a safe and supportive environment for students, along with access to a diverse range of leadership, sporting, cultural, community and social activities. Students at Creston have access to opportunities to advance their studies and personal interests, which connect them for career and life.

The College welcomes women of all ages and backgrounds-residents, friends, family, other students attending institutions in Sydney, young professionals and mothers.

Personal and professional mentoring

Personal and professional develop programmes

Volunteering opportunities

Formal dinner guest speakers

House Committee: Led by the President, the 6 members are elected by the student body.

Under the governance of a student-drafted Constitution, the Student Club Executive organises a variety of social, community, cultural and sporting activities throughout the year, including the O Week program.

Resident Tutor Team: Resident Tutors (RTs) are appointed by the College to provide guidance for the residents within their wing. By providing support, acting as a resource, coordinating wing events, and working together to ensure College policies and expectations are met, RAs are the first level of wellbeing support at Creston.

Enablers	<ul style="list-style-type: none"> - Strong community and culture encourage residents to see College as 'home' and not simply 'a place to stay'. - Convenient access to academic resources: Students are close to libraries, study spaces, and faculty, which can improve academic performance. - Safety and security: Purpose-built accommodation includes 24/7 security and controlled access, creating a safe environment. - Opportunities for personal development: Social and cultural programs within the College help students develop life skills and networks. - The College's team fosters strong relationships and personalised support - Cost predictability: Bundled services (utilities, internet, maintenance) simplify budgeting for students and families - Integrated support systems: On-site staff can quickly respond to student needs, from pastoral care to academic assistance
Systemic risks	<ul style="list-style-type: none"> - Very small percentage of students who are difficult to engage and do not participate in college life. These students are identified by staff and monitored (where possible) by student leaders. - Currently limited explicit discussion/mention of gender-based violence in policies and education and training
Key actions in response	<ul style="list-style-type: none"> - Integrate gender-based violence messaging about prevention in orientation, education and training and wellbeing programs - Incorporate early intervention strategies, such as regular check-ins and proactive outreach to students showing signs of distress in wellbeing and mentoring programs - Reference gender-based violence explicitly in all relevant policies - Provide 24/7 access to trained support staff or external helplines
Evidence	<ul style="list-style-type: none"> - Orientation schedules - Details of counsellor provided - Workshop attendance records

POLICIES AND PROCEDURES

Made available to students:

- Alcohol Policy & Procedures
- Bullying, Harassment and Discrimination Policy
- Emergency Evacuation & Procedures
- Grievance Management Policy
- Guidelines for Student Leaders
- Sexual Misconduct Prevention and Response Policy

- Gendered Violence policy
- Visitors policy
- Internet and Network Usage Policy
- Audio-visual entertainment Policy
- Student Code of Conduct

Enablers	- Policies are designed to ensure stability, consistency, and compliance with best practice standards. While amendments outside formal review cycles require careful consideration, this structured approach guarantees that any changes are thoroughly evaluated, legally sound, and aligned with a commitment to safety, equity, and inclusion. This process reinforces confidence in the integrity and reliability of our policy framework.
Systemic Risks	- None identified
Barriers	- None identified
Key actions in response	- Review all relevant policies to address GBV explicitly where relevant
Evidence	- Updated policy documents

MANAGEMENT AND GOVERNANCE

Creston operates as an affiliated residential college of UNSW. The College is governed by a Board that provides strategic oversight and ensures compliance with legislative and regulatory requirements. It is comprised of 5 members and 2 advisors with expertise in education, governance, finance, law, strategy, marketing, property and community engagement, and meets regularly to review policy, risk management, and strategic priorities. Day-to-day operations are managed by a leadership teaming which included Head of College and the Dean and is responsible for strategic direction, student wellbeing, academic support, financial and operational services, and stakeholder engagement. The Board’s constitution embeds commitment to promote the dignity of every human being.

Enablers	- The Management Team updates the Board regularly on any matters related to student wellbeing. - A comprehensive risk management framework exists, and the Risk Register is reviewed regularly. - Gender-based violence education and prevention work and initiatives are considered an important topic by all management and Board members.
Systemic Risks	- None identified
Barriers	- None identified

Key actions in response	- Include GBV prevention/information as a regular standing item on the Board and Management Team meeting agendas to monitor early intervention effectiveness - e.g. tracking how quickly concerns are identified and addressed.
Evidence	- Excerpts of Meeting agendas and minutes

4. Approach

The Plan outlines Creston College's commitments in meeting the requirements of the National Code to Prevent and Respond to Gender-based Violence in Higher Education (National Code). It prioritises early intervention and continuous improvement as core principles in alignment with the National Code. The Plan establishes a coordinated framework to prevent gender-based violence, support those affected, and ensure effective, accountable responses across the whole organisation.

The Whole-of-Organisation Prevention and Response Plan is a significant evolving and foundational document that guides Creston in how to prevent and respond to GBV. It evolves by incorporating changes from experience and increased knowledge and any changing circumstances or legislation.

The Plan has been informed by a Whole-of-Organisation Assessment of the enablers, systemic risks and barriers to preventing gender-based violence in Creston College. The Assessment is provided in Attachment A.

The Whole-of-Organisation Plan is structured into five key relevant focus areas that align with the National Code:

1. Accountable Leadership and Governance
2. Safe Environments and Systems
3. Knowledge and Capability
4. Safety and Support
5. Data, Evidence and Impact.

1. ACCOUNTABLE LEADERSHIP AND GOVERNANCE

Code	National Code Standard summary	Key Actions	Evidence of Compliance
7.2	A Provider must require a student accommodation provider to prepare, implement and publish on its website a Whole-of-Organisation Prevention and Response Plan	- Publish the Whole-of-Organisation Plan on the website	- Website page where Plan is published - Creston consulted with staff - Board reviewed and endorsed the Plan

7.3	A Provider must require a student accommodation provider to monitor and measure the impact of the Prevention and Response Plan on an ongoing basis and update the Prevention and Response Plan at least every four years	<ul style="list-style-type: none"> - Conduct mandatory annual training for student leaders and staff on GBV and respectful relationships - Establish visible leadership commitment (Dean's message on website) - Include the National Code as a standing item on Board and Management Team agendas 	<ul style="list-style-type: none"> - Planned dates of future review cycles - Excerpt from Minutes of governance meetings showing GBV, and National Code discussions - Training Attendance records
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2. SAFE ENVIRONMENTS AND SYSTEMS

Code	National Code Standard summary	Key Actions	Evidence of Compliance
7.4(a)	<p>A Provider must require a student accommodation provider to:</p> <ul style="list-style-type: none"> - Require its staff to declare any previous investigations or substantiated allegations of gender-based violence in similar roles - Consider any declaration and associated risks in employment/engagement decision making - Consider any substantiated allegations found during a person's employment with the College in promotion/recognition processes - Require staff to declare any existing intimate personal relationship with a resident and manage and monitor any associated risks. 	<ul style="list-style-type: none"> - Seek declarations from the Board, staff and student leaders - Consider any declarations and associated risks in employment/engagement decision making - Seek declarations from the Board, staff and student leaders regarding any existing intimate personal relationship with a resident and manage and monitor any associated risks. - Develop a risk management plan if conflicts of interests arise. 	<ul style="list-style-type: none"> - Employment/volunteer screening forms - Declaration forms completed by the Board, staff and student leaders - Staff/student relationships policy

7.4 (b)	<p>A Provider must require a student accommodation provider to:</p> <ul style="list-style-type: none"> - Prohibit the use of a Non-disclosure Agreement (NOA) unless requested by the Discloser - If requested, ensure it does not stop the Discloser from sharing information as part of seeking support - Ensure any settlement agreements do not contain a non-disparagement clause 	<ul style="list-style-type: none"> - Ensure no NDAs to be used at the College unless explicitly requested by the discloser 	<ul style="list-style-type: none"> -GBV policy includes a statement about the use of NDAs.
7.4 (c)	<p>A Provider must require a student accommodation provider to:</p> <ul style="list-style-type: none"> - Adopt the Provider's policies and procedures on preventing and responding to GBV or have and implement their own that meet National Code requirements - Develop and review the policy at least every three years in consultation with relevant stakeholders. 	<ul style="list-style-type: none"> - Adopt the Provider's policies and procedures on preventing and responding to GBV 	<ul style="list-style-type: none"> - Collaborate with UNSW

3. KNOWLEDGE AND CAPABILITY

Code	National Code Standard summary	Key Actions	Evidence of Compliance
7.5	<p>A Provider must require a student accommodation provider to:</p> <ul style="list-style-type: none"> - Require residents and staff to complete prevention education and training and responding to disclosures training that meets requirements of Standards 3, is tailored to the student accommodation environment and is delivered or approved by the Provider. - Promote evidence-based prevention messaging tailored to the student accommodation environment - Evaluate any initiatives and use findings to inform future activities. 	<ul style="list-style-type: none"> - Facilitate the delivery by UNSW of mandatory Board and staff training on GBV annually - Facilitate the delivery by UNSW of mandatory student/student leader training on GBV 	<ul style="list-style-type: none"> - Record training completed
7.6	<p>A Provider must require a student accommodation provider to ensure risk assessments are only undertaken by people with expertise in Standard 3 and when internal capability is not sufficient, engage a person with requisite expertise.</p>	<ul style="list-style-type: none"> - Undertake Risk assessment internally by staff as required by standard 3 	<ul style="list-style-type: none"> - Evidence of Risk Assessment procedure and of staff qualifications

4. Safety and Support

Code	National Code Standard summary	Key Actions	Evidence of Compliance
7.7 (a)-(c)	<p>A provider must require a student accommodation provider to:</p> <ul style="list-style-type: none"> - ensure its responses, practices and support services are safe, person centered and trauma informed - provide or facilitate access to support services to disclosers and respondents - promote and disseminate information on how residents and staff can access policies, procedures and support services. 	<ul style="list-style-type: none"> - Facilitate the delivery by UNSW of training on trauma, and culturally safe practices - Adopt UNSW policies and procedures - Develop guides for supporting disclosers and respondents based on UNSW Guides 	<ul style="list-style-type: none"> - Record of training - Partner with UNSW for support services
7.7 (d)	<p>A provider must require a student accommodation provider to undertake a risk assessment following every disclosure and formal report.</p>	<ul style="list-style-type: none"> - Create Risk assessment documentation 	<ul style="list-style-type: none"> - Risk assessment documentation
7.7.(e) (i)	<p>Where a disclosure relates to behaviour occurring in residence or at an event organised by the residence, a provider must require a student accommodation provider to take all necessary action to manage risk, including relocation of the respondent where required and facilitating urgent access to support services.</p>	<ul style="list-style-type: none"> - Establish and review disclosure procedures and flowcharts (Guide provided by UNSW) - Include the material informing disclosers and responders 	<ul style="list-style-type: none"> - Disseminate Guidance/flowcharts for disclosures (Emphasising that Disclosers and Responders need to be kept informed and supported) - Range of Physical safeguards across the College (See Assessment document)
7.7.(e) (ii)	<p>A provider must have arrangements in place with a student accommodation provider to enable a discloser to choose the provider to lead the response to a disclosure, and the student accommodation provider must cooperate fully and implement any outcomes decided by the provider.</p>	<ul style="list-style-type: none"> - Adopt UNSW Gender-based Violence Policy which enables the disclosure to have voice, choice and agency in who leads the response 	<ul style="list-style-type: none"> - Ensure staff and student leaders familiar with the policy and procedure
7.7.(e) (iii)	<p>A provider must have arrangements in place with a student accommodation provider to enable a discloser to choose the</p>	<ul style="list-style-type: none"> - Adopt UNSW policy and procedures 	<ul style="list-style-type: none"> - Ensure staff and student leaders familiar with the

	<p>student accommodation provider to lead the response to the disclosure, and the student accommodation provider must:</p> <ul style="list-style-type: none"> - undertake a risk assessment within 48 hours and from this determine necessary safety measures (including relocation of the respondent) and immediately implement them - manage and monitor risk - share necessary information with the provider to protect safety of others - implement support plans for both disclosers and respondents that meet requirements of Standard 4 within 48 hours. 		policy and procedure
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5. Data, evidence and impact

Code	National Code Standard summary	Key Actions	Evidence of Compliance
7.8	A provider must require a student accommodation provider to collect and report data prescribed by Standard 6, where applicable.	<ul style="list-style-type: none"> - Establish process for data collection and analysis to facilitate reporting requirements 	<ul style="list-style-type: none"> - Data records