



SANCTA
SOPHIA COLLEGE
WITHIN THE UNIVERSITY OF SYDNEY
Walk in Wisdom

Sancta Sophia College
Whole-of-Organisation
Prevention and Response Plan

National Higher Education Code to Prevent and Respond to Gender-Based Violence

Introduction

Sancta Sophia College is an independent Catholic residential college within the University of Sydney. Celebrating its centenary in 2026, Sancta is home to approximately 200 undergraduate women residents and 100 postgraduate women and men residents. A further 40 students are connected to Sancta as associate members.

Sancta is governed by the Sancta Sophia College Council, which comprises 14 members, including the College Principal.

The College has 20 permanent members of staff, including the Principal and Vice Principal. The staff team share responsibility for student experience, including the spiritual, pastoral and academic needs of students, business administration and facility management. The Principal, Vice Principal and Dean of Students live permanently on site. Catering services are outsourced to catering company Cater Care.

Each year, the College employs 15-16 students as Resident Assistants and approximately 20 students as tutors. Such employment is on a casual basis. A further 10 non-student tutors are also engaged on a casual basis.

Sancta Sophia College is committed to doing all in its power to foster a safe, respectful and supportive environment for all members of our community. Sancta describes itself as a college for “women and their allies” and, as such, welcomes the introduction of the *National Higher Education Code to Prevent and Respond to Gender-based Violence* (National Code) as an opportunity to review and strengthen our capacity to prevent and respond to gender-based violence and its associated harms within our own community. To support this work, a formal *Agreement between the University of Sydney and Sancta Sophia College* (Agreement) was entered into in November 2025, by which Sancta is legally bound to meet all requirements of the Code as a student accommodation provider.

This Whole-of-Organisation Plan to prevent and respond to gender-based violence is framed by an understanding of the drivers of violence against women as articulated in Australia’s national framework to prevent violence against women, *Change the Story*. These drivers are:

- condoning of violence against women
- rigid gender stereotypes
- men’s control of decision-making and limits to women’s independence in public and private life
- male peer relations that emphasise aggression and disrespect towards women.

Other forms of discrimination and inequality – such as racism, homophobia, transphobia – intersect with gender inequality to compound people’s experiences of violence.

Evidence from Change the Course (2017) and the National Student Survey (2021) shows that in university and college communities, gender-based violence is more likely to occur when:

- harmful social norms go unchallenged, such as acceptance of sexist attitudes or gender stereotypes
- hierarchical structures create power asymmetries between students, or between students and staff
- institutional culture minimises or fails to respond to problematic behaviours
- group dynamics lead to higher risk-taking behaviour, especially initiation rituals, and unsafe use of alcohol or other drugs

Harms associated with gender-based violence are often exacerbated by:

- cultures that deter reporting through fear of retaliation, stigma, shame or distrust
- difficulties in accessing the right supports, at the right time
- systems and processes that are not trauma-informed or person-centred.

This Whole-of-Organisation Prevention and Response Plan outlines Sancta's commitment to meet the requirements of the National Code. It establishes a framework for the prevention of and response to gender-based violence, based on the above circumstances. Our prevention strategies focus on upholding a community culture of respect and accountability through communication, education and engagement, while our response approach is trauma-informed, person-centred, compassionate and fair. This Plan has been informed by an assessment of the enablers, systemic risks and barriers to preventing gender-based violence at Sancta, appended to this Plan.

Sancta's Whole-of-Organisation Plan is structured into five key areas.

- Accountable leadership and governance
- Safe environments and systems
- Knowledge and capability
- Safety and support
- Data, evidence and impact

Accountable leadership and governance

Requirement	Key actions	Evidence of compliance
<p>7.2 A Provider must require that a Student Accommodation Provider prepare, implement and publish on its website a Whole-of-Organisation Prevention and Response Plan that:</p> <ul style="list-style-type: none"> a. records the Student Accommodation Provider's Whole-of-Organisation approach to preventing and responding to Gender-based Violence that prioritises the safety and support of Residents and Student Accommodation Staff; b. addresses the factors that drive and contribute to Gender-based Violence, as well as any factors relevant to the Student Accommodation Provider's context; c. records how the Student Accommodation Provider will implement the requirements in paragraphs 7.2 to 7.8 of the Code; d. includes a Whole-of-Organisation assessment that identifies systemic risks, enablers and barriers to preventing Gender-based Violence; e. includes actions that will be taken in response to findings of the assessment; f. reflects the needs, experience and agency of all members of the Student Accommodation Provider's community, 	<ul style="list-style-type: none"> 1. Formation of a Gender-based Violence Advisory Group of students, staff and Council members. 2. Continued promotion of specialist support services to the advisory group and to all students and staff through the Sancta portal, newsletters, emails, letters, forums, meetings, discussion etc. 3. Using the above channels, increase communication in the College about gender-based violence, its prevention and response. 	<ul style="list-style-type: none"> 1. A legally-binding <i>Agreement between the University of Sydney and Sancta Sophia College</i> (Agreement) was entered into in November 2025, binding Sancta to the requirements of the National Code. 2. Meeting minutes / circular resolution noting the formal adoption of Sancta's Whole-of-Organisation Plan by the Sancta Sophia College Council. 3. Publication of this Whole-of-Organisation Plan on the College website. 4. Publication of the Whole-of-Organisation Assessment on the College website. 5. Formal designation of responsibility for the implementation of the Plan to the College Principal and Executive Team. 6. Formal written report by the Principal on the implementation / compliance with the Plan, delivered to the November meeting of the Sancta Council each year. 7. Minutes of Executive Team meetings and staff meetings demonstrating implementation of Whole-of-Organisation Plan. 8. Council meeting minutes demonstrating monitoring activities by Council of the implementation of the Plan. 9. Meeting minutes of Gender-based Violence Advisory Group.

particularly those members who are disproportionately affected by gender-based violence, including women, First Nations people, culturally and linguistically diverse communities, people with disability and people of diverse sexual orientation and gender identity; and

- g.** is developed through engagement and collaboration with Residents and Student Accommodation Staff, including in its design and implementation, and including those who have experienced gender-based violence.

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- 7.3** A Provider must require that a Student Accommodation Provider 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.
- 1.** Introduce questions into the Student Experience Survey and Staff Satisfaction Survey to monitor how students and staff experience Sancta's preventative and responsive measures regarding gender-based violence and their familiarity with support and complaint mechanisms
 - 2.** Use existing student year group meetings to consult on gender-based violence prevention and response strategies
 - 3.** Engage student representatives to represent to College leadership the needs of students on prevention and response to gender-based violence matters
- 1.** Sancta's evaluation framework monitors and measures the impact of the Plan, using systematic collection and analysis of the following data points:
 - a.** all disclosures/informal reports and complaints / formal reports of gender-based violence, including those matters that fall below the threshold of gender-based violence
 - b.** support service usage, including Sancta's counselling service and services of the University's Safer Communities Office
 - c.** how matters are raised by students and staff
 - d.** Training records of student leaders, new students, returning students, staff with pastoral responsibilities

- e. Student experience survey data
 - f. Staff satisfaction survey data
 - 2. Council meeting minutes noting report and discussion of incidents, complaints and other related data
 - 3. Records of meetings of the Gender-based Violence Advisory Group
 - 4. Staff meeting minutes
 - 5. Interview templates for prospective students
 - 6. Records of student “town hall” meetings, noting discussion of gender-based violence
 - 7. Review and update the Plan every four years
 - 8. Documentation of review and changes to the Plan
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Safe environments and systems

Requirement	Key actions	Evidence
<p>7.4a A Provider must have arrangements in place with a Student Accommodation Provider that:</p> <p>(a) in relation to Student Accommodation Staff, require the Student Accommodation Provider to:</p> <ul style="list-style-type: none"> i. ask Student Accommodation Staff to declare whether they have been investigated for an allegation of Gender-based Violence, or determined to have engaged in conduct that constitutes Gender-based Violence in similar positions, or during the course of any employment or engagement as a contractor, or otherwise in a legal process; ii. consistent with the Student Accommodation Provider's duty of care, take into consideration any declaration made under paragraph 7.4(a)(i) and any risks arising from the declaration in determining the person's suitability for the position; iii. take into consideration any substantiated allegation of Gender-based Violence found by the Student Accommodation Provider in the course of the employment or engagement of 	<ol style="list-style-type: none"> 1. Incorporate applicant and employee declarations of past investigations for gender-based violence into Sancta employment policies, including clear messaging regarding the purpose of such declarations 2. Ensure employment policy includes process used to assess risk, safety and suitability based on declarations, taking duty of care to students and staff into account, and all information known about a candidate for purposes of employment or promotion 3. Review position descriptions and employment contracts of all roles with pastoral responsibilities to ensure expected conduct and behaviours are included, and to explicitly state that gender-based violence is unacceptable 4. All staff with responsibilities for the employment of staff with pastoral responsibilities to be trained in procedures relevant to assessing risk, safety and suitability based on 	<ol style="list-style-type: none"> 1. Declaration Form for all staff / prospective staff with pastoral responsibilities, inclusive of clear messaging about the purpose of such declarations, and the attendant confidentiality and assessment process 2. Meeting minutes of the Workplace Health and Safety sub-committee of Sancta's Council, through which Sancta's HR system compliance with the Code will be monitored. 3. Template for conflict of interest or risk management plans to be used for any declaration.

- Student Accommodation Staff, with respect to their promotion or recognition;
- iv. require Student Accommodation Staff to declare any existing or previous intimate personal relationship with a Resident of the Student Accommodation Provider; and
- v. where a declaration is made in accordance with paragraph 7.4(a)(iv), implement as necessary any conflict-of-interest or risk management plan that includes any necessary alternative arrangements.

gender-based violence declarations

5. Develop procedures for documenting and securely storing all declarations, risk assessments, mitigation measures and decisions in accordance with privacy requirements.

7.4b A Provider must have arrangements in place with a Student Accommodation Provider that: (b) in relation to Non-disclosure Agreements and Non-disparagement Clauses:

- i. prohibit the use of a Non-disclosure Agreement, unless requested by the Discloser;
- ii. if a Discloser requests the use of a Non-disclosure Agreement in relation to Gender-based Violence, any such agreement with the Student Accommodation Provider must not stop the Discloser from sharing their experience for the purpose of seeking support and advice or the Student Accommodation Provider from

1. Review of HR policies to ensure consistency with Sancta's *Sexual Harm and Gender-based Violence Prevention and Response Policy*

1. No previous use of non-disclosure agreements for gender-based violence matters.
2. Explicit prohibition of use of non-disclosure agreements in relation to gender-based violence matters, unless specifically requested by the discloser, within Sancta's *Sexual Harm and Gender-based Violence Prevention and Response Policy* (Policy)
3. Policy explicitly states that where a non-disclosure agreement is sought by a discloser, this will be verified and recorded, inclusive of the discloser's informed and voluntary consent.
4. Policy explicitly states that where a discloser requests a non-disclosure agreement, it will permit them to seek support and advice and to report the incident and remove any non-disparagement clauses that could limit disclosure.

- complying with their reporting obligations under the Code; and
- iii. any settlement terms agreed between the Discloser and the Student Accommodation Provider must not contain a Non-disparagement Clause that could have the effect of requiring the Discloser to keep their experience of Gender-based Violence confidential.

7.4c A Provider must have arrangements in place with a Student Accommodation Provider that, in relation to Policies and Procedures:

- i. adopt the Provider's Policies and Procedures on preventing and responding to Gender-based Violence; or
- ii. have and implement a Policy on preventing and responding to Gender-based Violence that applies to Residents and Student Accommodation Staff, that meets the requirements of 7.4(c)(ii)(A) to 7.4(c)(ii)(H).
- iii. develop and review the Policy referred to at 7.4(c)(ii) at least every three years, following engagement and collaboration with those listed at paragraphs 7.4(c)(iii)(A) to 7.4(c)(iii)(E)
- iv. enable the Provider, upon the Provider's request, to review the policies and/or procedures of the Student

1. Sancta's *Sexual Harm and Gender-based Violence Policy* and related procedures will be reviewed every three years, following consultation with students and staff.
2. The review will be led by the Gender-based Violence Advisory Group and be informed by:
 - a. feedback from students and staff
 - b. evidence-based literature
 - c. any changes or additions to University of Sydney Policy

1. Sancta has aligned its *Sexual Harm and Gender-based Violence Policy* and related procedures on that of the University of Sydney. It is inclusive of:
 - a. Person-centred and trauma-informed principles, with emphasis on safety, choice and empowerment for disclosers
 - b. Support pathways
 - c. National Code definition of gender-based violence
 - d. Clear statement of commitment declaring that gender-based violence is unacceptable in any context
 - e. Steps to make disclosures and formal reports, and detail as to how confidentiality and safety will be managed
2. Sancta's policy is published on our website and on our student portal. A simplified version is included in both the student and staff Walk in Wisdom Guide.
3. Training is provided to student leaders about the policy, emphasising how to make complaints and access support.

Accommodation Provider relating to Gender-based Violence and provide feedback for the purposes of ensuring compliance with this Standard 7.

4. Induction training for new students and staff includes details about raising complaints and seeking support. This training includes using the anonymous reporting portal RespectX.
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Knowledge and capability

Requirement	Key actions	Evidence
<p>7.5 A Provider must have arrangements in place with a Student Accommodation Provider in relation to training and education, and prevention initiatives that:</p> <p>(a) require all Residents and Student Accommodation Staff to complete prevention and responding to Disclosures education and training, which is delivered or approved by the Provider, meets the requirements in Standard 3 and is tailored to the Student Accommodation environment;</p> <p>(b) require Student Accommodation Providers to promote and widely disseminate evidence-informed prevention communication and key messaging tailored to a Student Accommodation environment; and</p> <p>(c) require any prevention initiatives, including programs and campaigns delivered by the Student Accommodation Provider, to be evidence-based and evaluated and evaluation findings must inform future prevention initiatives.</p>	<ol style="list-style-type: none">1. Provide training to senior staff with pastoral responsibilities not already qualified to conduct risk assessments and investigations.2. Gender-based Violence Advisory Group to consult with students and staff regarding messaging, testing for clarity, relevance and impact, with recommendations made for continuous improvement3. Implement any pre-testing and post-testing of the University relevant to training to measure changes in awareness, attitudes and behaviours related to gender-based violence.	<ol style="list-style-type: none">1. Whole-of-Organisation Assessment includes a needs assessment of training needs for staff with pastoral responsibilities.2. All new staff with pastoral responsibilities are required to complete prevention and responding to disclosures education and training.3. In-person prevention and responding to disclosures training is delivered to all new students by the University of Sydney.4. Online prevention and responding to disclosures training is provided by the University of Sydney to all returning / continuing students.5. Training register for all students and staff with pastoral responsibilities is maintained. Follow up with those who have not completed the training occurs.6. Feedback regarding training is shared between the University and Sancta.7. Sancta uses a range of platforms to communicate key prevention and response messages to current and prospective students and staff, including website, newsletters, in-person discussion, social media, Formal Dinner speeches etc.8. Analysis of data of training completions against complaints and incident data.

7.6 A Provider must have arrangements in place with a Student Accommodation Provider to ensure that risk assessments are only undertaken by persons who have the expertise and experience in 3.14 of Standard 3. Where a Student Accommodation Provider does not have staff with the necessary expertise and experience to conduct a risk assessment, the Student Accommodation Provider must engage a who has the necessary expertise and experience.

1. Future recruitment of staff will ensure the capacity to adhere to Standard 3.14 of the Code is maintained.
 2. Annual reviews to be conducted to ensure that Sancta maintains capacity to conduct risk assessments, inclusive of currency of training, in keeping with the requirements of Standard 3.14 of the Code.
1. Risk assessments are only conducted by staff who meet the requirements of Standard 3.14 of the National Code.
 2. Staff conducting risk assessments are provided with ongoing professional development and training on risk assessment processes in response to disclosures and formal reports, understanding of evidence-based risk factors, protective factors, dynamics of gender-based violence, coercive control, the impacts of trauma and how experiences of gender-based violence differ across communities
 3. At times when no appropriately qualified staff are available to conduct risk assessments, Sancta will draw from appropriately qualified staff of the University of Sydney and/or other Colleges. In return, appropriately qualified Sancta staff will be available to assist other Colleges with risk assessments if needed.
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Safety and support

Requirement	Key actions	Evidence
<p>7.7 A Provider must have arrangements in place with a Student Accommodation Provider that, in relation to Disclosures, require the Student Accommodation Provider to:</p> <p>(a) ensure that its responses, practices and support services are safe, person-centred and consistent with a trauma-informed approach;</p> <p>(b) provide or facilitate access to support services to persons making Disclosures and/or Formal Reports and to Respondents, including explaining available support services relevant to educational outcomes;</p> <p>(c) actively promote and make widely available information about how Residents and Student Accommodation Staff can access policies and procedures and internal and/or external support services. This information must be accessible and publicly available, drafted in plain English and able to be translated into different languages;</p> <p>(d) undertake a risk assessment in response to all Disclosures and Formal Reports of Gender-based Violence and manage</p>	<ol style="list-style-type: none"> 1. Training for Executive Team members and senior staff with pastoral responsibilities in person-centred and trauma-informed approaches and practice 2. Continue to build capacity amongst staff team to deliver best practice responses to incidents of gender-based violence through recruitment practices and staff education and training. 3. Integrate questions into the annual Student Experience Survey and Staff Satisfaction Survey's to test awareness of policies, procedures and support services. <p>Continued discussion with the University of Sydney to ensure smooth information flow to enable support, investigation and decision making.</p>	<p><i>Safe, person-centred and trauma-informed responses, practices and support services</i></p> <ol style="list-style-type: none"> 1. All Sancta policies prioritise safety, support and individual dignity 2. Policies are reviewed regularly and updated in accordance with community standards, feedback of students and staff and best practice. 3. Regular and ongoing supervision is provided for staff responding to disclosures 4. All staff are provided with continuing access to an EAP provider 5. A Resident Assistant and a Senior Staff member (Principal, Vice Principal or Dean of Students) are always on call outside of business hours. <p><i>Facilitating access to support services</i></p> <ol style="list-style-type: none"> 6. Referral pathways for residents and staff are published in Sancta policies, in the student and staff Walk in Wisdom guides and located as the first item at the top of Sancta's portal. This curated list includes specialist gender-based violence service providers, some of which offer 24/7 service delivery. 7. Referral pathways include specialist support services for Aboriginal and Torres Strait Islander people, people from

and monitor any identified risks on an ongoing basis;

- (e)** in circumstances where a Disclosure relates to conduct that occurred in Student Accommodation or at an event organised by a Student Accommodation Provider:
 - i.** take all necessary immediate action proportionate to the risk arising from the Disclosure to ensure the safety of the Discloser or other Residents or Student Accommodation Staff. This may include relocation of the Respondent to alternative accommodation and/or arranging available urgent support services for the Discloser and Respondent;
 - ii.** enable a Discloser to elect that the Provider leads the response to the Disclosure, including supports, and any investigation and/or disciplinary process, and if the Discloser so elects, require the Student Accommodation Provider to:
 - a.** co-operate fully with the Provider in leading the response to the Disclosure, including information sharing; and
 - b.** implement any outcomes decided by the Provider; and

culturally and linguistically diverse backgrounds, LGBTQIA+ people, and people with disabilities.

- 8.** Staff with pastoral responsibilities are equipped with a list of specialist gender-based violence support services, ready for sharing if needed.
- 9.** Senior staff with pastoral responsibilities offer to make warm referrals for support services in all cases of gender-based violence, and also explain how the discloser could access the service themselves.
- 10.** File notes are kept of all gender-based violence and related matters, including records of all referrals offered and made.
- 11.** Academic support and referrals to University support services are consistently offered, including support to seek special consideration for academic requirements, or interim measures to achieve no contact between disclosers and respondents.
- 12.** Support and referral options are given to both disclosers and respondents in all gender-based violence and related matters.

Information about policies, procedures and support services

- 13.** A summarised, plain English version of Sancta's *Sexual Harm and Gender-based Violence Prevention and Response Policy* is located in student and staff Walk in Wisdom Guides (student and staff handbooks).
- 14.** The Policy/WIW Guide provides guidance on accessing academic adjustments, special consideration, counselling and other supports and resources.
- 15.** The Policy is promoted through Walk in Wisdom Guides, induction training, newsletters, and Formal Dinner

- iii. in circumstances where a Discloser elects the Student Accommodation Provider to lead the response to the Disclosure:
 - a. undertake a risk assessment within 48 hours of receiving the Disclosure or Formal Report or immediately when required:
 - i) which must take into account and seriously consider the views of the Discloser; and
 - ii) to determine safety measures to be implemented to protect the safety of the Discloser and other Residents, including relocation of the Respondent to alternative accommodation;
 - b. immediately implement any safety measures identified by the risk assessment;
 - c. manage and monitor any identified risks; and
 - d. provide information to the Provider about a Disclosure, including informing the Provider of the outcome of the risk assessment and for assistance with managing and monitoring any identified risks:

speeches. While primary communication will take place during Welcome Week and Week One of first and second semesters each year, key messages will be repeated at planned and opportune times throughout semester.

- 16. Sancta uses RespectX as an anonymous and non-anonymous disclosure and complaint portal for both students and staff. It is promoted with and separately to the Policy. Signage and QR Codes to make reports on RespectX are located throughout Sancta.

Risk assessment, management and monitoring for all disclosures and formal reports

- 17. Sancta's *Sexual Harm and Gender-based Violence Prevention and Response Policy* include details as risk assessment, management and monitoring in response to disclosures and formal reports.
- 18. All staff with pastoral responsibilities are trained in responding to disclosures and formal reports and receive advice as to their role in risk assessment.
- 19. Only staff with the required experience and expertise (as defined in Standard 3.14) conduct risk assessments.
- 20. Sancta utilises the RespectX risk assessment framework, inclusive of immediate and ongoing risks, points of contact between discloser and respondent at Sancta, at University and in other contexts.
- 21. Safety plans are implemented and monitored; records are retained.
- 22. Internal and external support services are liaised with as appropriate and with reference to the disclosers wishes for privacy.

- i) with the consent of the Discloser; or
 - ii) whereas a result of the risk assessment in paragraph 7.7(e)(iii)(A), it is reasonably necessary to provide that information to the Provider to protect the wellbeing and safety of Students and/or Student Accommodation Staff; or
 - iii) where such information is confined to the fact that a Disclosure has occurred and how that Disclosure is being managed by the Student Accommodation Provider consistently with the Code and the affiliation agreement and is provided in a manner which does not and would not identify the Discloser.
 - e. within 48 hours of a Disclosure or Formal Report develop and implement a support plan collaboratively with and as desired by the Discloser in accordance with the relevant requirements in Standard 4; and
 - f. Within 48 hours of a Disclosure or Formal Report, develop and
- 23. Interim measures, following risk assessment, are documented.
 - 24. Risk assessments are conducted immediately upon the matter being brought to the attention of senior staff with responsibility for pastoral care, and interim measures arranged, proportionate to the assessed risk to the safety of the discloser or other residents and staff.
 - 25. Where it is assessed as unsafe for a respondent to remain in the College before or during an investigation, alternate accommodation arrangements will be made.
 - 26. Appropriate support services are made available to both discloser and respondent.
 - 27. All incidents, actions, risk assessments and safety measures (including interim measures) and offers of support are documented, inclusive of date and time.
 - 28. All disclosers are offered to have the response to their disclosure looked after by the University or by Sancta. This is reflected in the Agreement between the University and Sancta, and in Sancta's *Sexual Harm and Gender-based Violence Prevention and Response Policy*.
 - 29. Disclosers are supported to make decisions about which entity they wish to manage their matter. Disclosers are invited / advised to seek other advice and to consult with specialist support services to assist in decision making. Warm referrals are offered. Where appropriate, the discloser is given time to support decision making.

implement a support plan collaboratively with and as desired by the Respondent in accordance with the relevant requirements in Standard 4.

Responses led by the University

- 30.** Adherence to the Agreement between the University and Sancta, inclusive of how information is shared and recommended actions implemented.
- 31.** Participation in all training offered by the University
- 32.** Retention of relevant records.

Responses led by Sancta

- 33.** Records of all gender-based violence matters are retained on RespectX, including records of the discloser's decision for the response to be led by Sancta.
 - 34.** Risk assessments are completed within 48 hours of disclosures being received. Assessments consider the disclosers' views and ensure support and safety measures are in place for disclosers and respondents.
 - 35.** Safety measures identified during risk assessment are implemented. Safety is continuously monitored. Supports for disclosers and respondents are identified and offered.
 - 36.** Adherence to the Agreement between the University and Sancta, inclusive of information sharing.
 - 37.** Support plans for disclosers and respondents are developed within 48 hours, in collaboration with them and consistent with the requirements of Standard 4 of the Code.
 - 38.** Documentation of all incidents, actions, risk assessments and safety measures is recorded and retained.
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Data, evidence and impact

Requirement	Key actions	Evidence
<p>7.8 A Provider must have arrangements in place with a Student Accommodation Provider that requires data collection and reporting to the provider consistent with Standard 6 of this Code, as applicable.</p>	<ol style="list-style-type: none">1. Systematic data collection and analysis of<ol style="list-style-type: none">a. all disclosures/informal reports, and complaints/formal reports of gender-based violence, including those matters that fall below the threshold of gender-based violenceb. all matters raised by RAs on behalf of other studentsc. all matters raised by staff on behalf of students or other staffd. support service usage, especially Sancta's counselling service and services of the University's Safer Communities Officee. how matters are raised by students and stafff. Training records of:<ol style="list-style-type: none">i. student leadersii. new studentsiii. returning studentsiv. resident assistantsv. staff with pastoral care responsibilities	<ol style="list-style-type: none">1. Provision of all data to the University as required under the Code.2. Adherence to Section 3 of the <i>Agreement between the University of Sydney and Sancta Sophia College</i> regarding cooperation and sharing of information.
