



UNIVERSITY
OF WOLLONGONG
AUSTRALIA

ACCOMMODATION SERVICES DIVISION REVIEW 2018

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on behalf of the Director, Student Services Division.

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Code Black Report - Executive Summary Excerpt

This review examined the factors that can contribute to sexual assault and sexual harassment (SASH) at the University of Wollongong (UOW) accommodation services during the latter half of 2018. The review follows an emphasis on the role of residential colleges and university residences being called out by the *Respect.Now.Always.* survey as requiring more action to provide a safe environment free from sexual harm (AHRC, Australian Human Rights Commission, 2017). While UOW is proud to be ranked among the top universities in the world, senior leadership acknowledge that SASH incidents have occurred despite the University taking its obligations to prevent and respond effectively very seriously. Preventing and responding to SASH effectively is a complex challenge that the University has committed to continue addressing by enacting multiple initiatives and undertaking several reviews.

Students living in a university residence are a notable priority as the University's duty-of-care extends beyond classroom and field experiences, to the homes in which they live. Creating accommodation sites that enhance the student experience was reported across all UOW sites as being a long-term priority. This is a considerable undertaking with seven sites holding a total capacity of 2610 tenants (plus 78 units at Graduate House) and a demographic skewed to late teens and early twenties where many are experiencing living away from family for the first time.

In this context, Code Black Threat Management reviewed the SASH prevention strategies and response adequacy. Student Services Division (SSD) oversaw the review to support its independence from the Accommodation Services Division (ASD) operations. The review methodology comprised a desktop review of policy and procedure documentation, two stakeholder workshops, 12 focus groups with student residents, one workshop with a student group conducted between August to November, 2018 (Allsorts Queer Collective), 13 individual interviews with students and 35 individual interviews with staff.

UOW was found to have invested considerable resources in developing a *Safe and Respectful Communities (SARC) framework* and providing training for staff and students who may be responders, bystanders or targets of SASH incidents. This investment was found to place UOW as among the more progressive universities in Australia. The SARC service, and its affiliates across UOW, have worked diligently to address SASH, providing the means for UOW to continue its traditions of excellence and leading the Illawarra region as a substantive employer and educator. To maintain this standing, ongoing improvements are needed a maturing of processes is required.

This review addressed nine Terms of Reference (TOR) and, at the request of SARC, clustered recommendations according to the five themes set out in the UOW SARC Action Plan (2019-2020), namely: *Leadership and Culture, Governance, Training, Services and Reporting, Reviews and Audits.*

Leadership and Culture

Top down endorsement of respect and accountability spearheads the culture of prevention at UOW. This was seen in ASD services. Kooloobong in particular had extensive resources dedicated to creating a respectful culture through a wellbeing focus and the use of positive psychology. As the largest site, with the youngest cohort this was exemplary. Other sites had a pastoral focus where staff and students commented on the "family feel" of the residence. Campus East stood out as creating a more structured, rule-based environment. This had impacted the student experience at Campus East where some residents felt the regulation of alcohol use and recreational activities was excessive. These practices were implemented to mitigate the risk of historic excessive drinking, unregulated parties and hazing recurring.

The culture of the sites was communicated to residents in several ways, such as website information and orientation packs. Student communications were found to be worded in aspirational language and based on highly innovative programs, such as UniCAN for responsible drinking at all sites, and site-specific support programs such as the use of positive psychology at Kooloobong and ResPASS peer support program at Marketview. Despite this, there were some incidents of hazardous drinking practices reported at all sites, where the number of incidents varied between sites. For example, Bangalay offered family accommodation and very rarely experienced issues related to alcohol. The ban on drinking in the public spaces had resulted in greater amenity of public spaces and was reported by residents as contributing to binge drinking in rooms, a practice with reduced opportunity for peers and/or leaders to monitor and intervene.

Governance

The *policy landscape* was complex and difficult to navigate the relevant policies and procedures that guided both the broader University and ASD in SASH matters. Three primary response mechanisms were in place to address SASH: *Sexual Harassment Prevention Policy*, *UOW Sexual Assault and Sexual Harassment Support Service* and *Safe and Respectful Community (SARC)*. Greater alignment of these mechanisms is recommended to streamline processes for those who have experienced SASH to obtain the support they need to make informed decisions. UOW Governance and Legal Division (GLD) particularly noted the complexities of decentralised policy ownership and were supportive of one policy to guide behaviour, such as a Student Code of Conduct. The University has engaged an independent expert to review the policy framework.

Training

The range of training opportunities provided for staff and student leaders in preventing and responding to SASH was comprehensive and based in trauma-informed principles. Training for student leaders as potential first responders was also found to be comprehensive at the outset of each academic year but lacking for those taking on this role at any other time of year. Mid-year training is recommended for new starters and any student leader who would like refresher training.

Services

ASD relied upon two UOW services: the *Sexual Assault and Sexual Harassment Support Service* and *Safe and Respectful Community (SARC) Team*. UOW had undertaken extensive development of these resources to support SASH reporting. This development should continue to take advantage of evolving operations and research on sexual harms. A limitation of the current services was the capacity to build redundancy plans. This meant the current UOW knowledge and skill base was housed with the few key staff.

While SARC was found to provide support for SASH incidents, other problem behaviours (such as aggression and bullying) were managed onsite. This created a gap in operations as reporting incidents to SARC required some discretion. While out of scope of this review, there are benefits for all critical incidents in ASD be managed by SARC where SARC, SASH Support Services, sexual harassment policies and the reporting channels are harmonised across the University. It is recognised that a resource shift will be required between ASD and SARC for this to occur.

Reporting, Reviews and Audits

At the time of this review (gazetted in section 5.1 of the UOW SARC Action Plan) several other reviews had been completed or were occurring. This commitment to reviewing and auditing policy and procedure should continue. The need for a central repository of information to streamline reporting and capture trends within and across cases is recommended.

Summary of Recommendations

The following table provides a summary of the review's nine recommendations.

<p>Recommendation One (Page 11)</p> <ul style="list-style-type: none"> ▪ Consolidate and clarify information available to survivors of SASH within policies and on the UOW website; ▪ Strengthen staff knowledge in locating information regarding SASH; ▪ Address underreporting via a cultural shift to support and build confidence in survivors of SASH; ▪ In addition, UOW should consider all forms of critical incidents to be reported and managed by SARC, not ASD; ▪ Use the <i>UOW Strategic Plan for 2016-2020</i> to articulate a valued-based approach to student conduct.
<p>Recommendation Two (Page 14)</p> <ul style="list-style-type: none"> ▪ Support packs provided by Counselling and Triage to be more actively reviewed with students; ▪ Confidentiality be described more explicitly in the UOW Support First Model; ▪ Abandon the use of trigger warnings and other messaging in training; ▪ Specialist staff ask students (from this point forward) disclosing about their satisfaction with UOW responses to date; ▪ Utilise more consistent language describing those involved in SASH incidences.
<p>Recommendation Three (Page 17)</p> <ul style="list-style-type: none"> ▪ Offer compulsory hazing-specific training and education to residents; ▪ Operationalise a hazing-specific framework to exist within residential policy; ▪ Isolate recording keeping of hazing data (incidences, reports and allegations); ▪ Trauma-informed support for hazing survivors and clearer reporting channels for hazing.
<p>Recommendation Four (Page 21)</p> <ul style="list-style-type: none"> ▪ All SASH risk factors be included in SASH prevention and response strategies; ▪ SARC Action Plan include more active engagement with the UOW Allsorts Queer Collective and support UOW's participation in the Ally Network; ▪ Utilise a three-tier assessment of all drinking practices and requests; ▪ Resources such as Alcocups and AlcoholEdu be included in 2019 training; ▪ All means of intervention be evidence-based and reviewed regularly.
<p>Recommendation Five (Page 24)</p> <ul style="list-style-type: none"> ▪ Specific education and training to residents of the <i>SafeZone</i> app; ▪ Adjust all the guests and visitor's sign-in policy to match that of Bangalay and Marketview; ▪ Consider a business case for night time security staff at Campus East and Marketview.
<p>Recommendation Six (Page 28)</p> <ul style="list-style-type: none"> ▪ Leadership in residences focus on methods of enhancing physical and psychological safety; ▪ All UOW accommodation sites consider elements of the Kooloobong Village positive psychology program to strengthen pastoral care; ▪ Availability of counsellors for residents be monitored.
<p>Recommendation Seven (Page 32)</p> <ul style="list-style-type: none"> ▪ Each senior leader promotes university values by taking responsibility for their leadership shadow; ▪ Delineate each prevention strategy as either harm or risk reduction; ▪ Minimum level training for all student leaders; ▪ A broad harm reduction approach allowing for other configurations of demographics.
<p>Recommendation Eight (Page 33)</p> <ul style="list-style-type: none"> ▪ Accommodation provide students regular familiarisation with the <i>General Student Conduct</i> and <i>Student Conduct in Residences Policy</i>; ▪ Language of student communication be more accessible and welcoming.
<p>Recommendation Nine (Page 35)</p> <ul style="list-style-type: none"> ▪ Harmonise SARC, SASH Support Services and Sexual harassment protocol reporting channels and information; ▪ Review the <i>Critical Incident Policy</i> for managing SASH; ▪ Procedures for ASD reporting SASH incidences be formalised and embedded into operational processes; ▪ SARC website include what a student may expect when the listed resources are contacted.

Project Scope and Objectives

The Australian Human Rights Commission (AHRC) released their report, *Change the Course*, in August 2017. The report detailed the results of a survey of university students across all Australian Universities into the prevalence of sexual harassment and assault within and around Australian Universities. The Vice Chancellor of the University of Wollongong has committed to implementing all recommendations from this report.

The review of ASD is an expert-led review of the factors that contribute to SASH in UOW accommodation as set in recommendation nine of *Change the Course*. That is:

In addition to considering the implementation of the university recommendations made in this report, residential colleges and university residences should commission an independent, expert-led review of the factors which contribute to sexual assault and sexual harassment in their settings.

UOW appointed Code Black Threat Management as the reviewer. Code Black has led and contributed to projects in Australia and New Zealand that have addressed prevention, early intervention and risk mitigation across the spectrum of aggressive behaviour, including SASH. Code Black's Clinical Director, Dr Lisa Warren, is renowned threat management expert, clinical/forensic psychologist and senior lecturer at the Monash University School of Psychiatry. The Code Black team are multidisciplinary and have academic and clinical expertise in the areas of prevention, support and responses to sexual assault, sexual violence and sexual harassment.

TERMS OF REFERENCE (TOR)

Nine *Terms of Reference* were developed by UOW and Code Black to guide the review.

1. The appropriateness and adequacy of the college or university residences formal policy and procedural framework and assessment of the adequacy of enacting this framework for receiving, investigating and responding to reports of sexual assault and sexual harassment;
2. A trauma-informed and rights-based approach in a situation in which an allegation of sexual assault has been made;
3. The ways that hazing practices and college 'traditions' facilitate a culture which may increase the likelihood of sexual violence;
4. The nature of student activities and programs organised or supported by Residential Services that provide an opportunity for the misuse of alcohol and/or drugs, that may facilitate a culture which may increase the likelihood of sexual violence, sexual harassment and compromise student safety.
5. The level and nature of supervision and security systems in a twenty-four-hour residential setting in which large numbers of young people are living away from home, benchmarked against the sector.
6. The level and adequacy of training required to equip residential advisors, student leaders and other support staff to serve as first responders or in response to matters of sexual assault, sexual harassment and critical incidents. The mechanisms by which Student Accommodation facilitate student safety and wellbeing.
7. The effectiveness of current education strategies for the prevention of sexual harassment and sexual assault;

8. The appropriateness and accessibility of the relevant policies and reporting requirements of the Accommodation Services Division and the University regarding the management of sexual harassment and sexual assault; and
9. The appropriateness and accessibility of procedures to address a disclosure of sexual harassment and/or sexual assault.

OUT OF SCOPE

Non-residence University activities, except to the extent that they are related to the prevention, support, reporting or management of sexual harassment and/ or sexual assault in University residences.

SUMMARY OF RECOMMENDATIONS - WITHIN ASD

RECOMMENDATION ONE-

Item	Recommendations	Recommended for support	Suggested UOW Response/Progress	Lead for Accountability	Timeframe
1.1	Consolidate and clarify information available to survivors of SASH within policies and on the UOW website.	✓	Incorporated in to SARC Action Plan. To be adopted.	SARC Working Party Governance and Legal Division	Q4 2019
1.2	Strengthen staff knowledge in locating information regarding SASH.	✓	Incorporated in to SARC Action Plan. To be adopted.	SARC Working Party Accommodation Services Division.	Q1 2019 Ongoing
1.3	Address underreporting via a cultural shift to support and build confidence in survivors of SASH.	✓	Incorporated in to SARC Action Plan. To be adopted.	Accommodation Services Division.	Q2 2019 Ongoing
1.4	UOW should consider all forms of critical incidents to be reported and managed by SARC, not ASD.	—	The recommendation is beyond the scope of this review, changes to operations, procedures and delegations. To be revisited in 12 months.	To be determined. Accommodation Services Division.	Q1 2020
1.5	Use the <i>UOW Strategic Plan for 2016-2020</i> to articulate a valued-based approach to student conduct.	✓	To be adopted through development of student charter.	Student Services Division. Pro Vice-Chancellor Students	Q4 2019

RECOMMENDATION TWO -

Item	Recommendations	Recommended for support	Suggested UOW Response/Progress	Lead for Accountability	Timeframe
2.1	Support packs provided by Counselling and Triage to be more actively reviewed with students.	✓	To be adopted.	Student Support Accommodation Services Division	Q3 2019
2.2	Confidentiality be described more explicitly in the UOW Support First Model.	✓	This has been completed in training and communications.	Student Support Accommodation Services Division	Q1 2019
2.3	Abandon the use of trigger warnings and other messaging in training.	—	UOW may elect to phase out messaging. Will consider usage in each communications package.	Student Support Student Services Division Accommodation Services Division	N/A

LEGEND: ✓ Proposal recommended

- Proposal not endorsed

Item	Recommendations	Recommended for support	Suggested UOW Response/Progress	Lead for Accountability	Timeframe
2.4	Specialist staff ask all students, from this point forward disclosing about their satisfaction with UOW responses to date.	—	Feedback will be embedded in processes.	Student Support SARC Working Party	N/A
2.5	Utilise more consistent language describing those involved in SASH incidences.	—	UOW will be guided by UA's guidelines for language used and recommendations in policy.	Working Party	N/A

RECOMMENDATION THREE

Item	Recommendations	Recommended for support	Suggested UOW Response/Progress	Lead for Accountability	Timeframe
3.1	Offer compulsory hazing-specific training and education to residents.	✓	Incorporated into SARC Action Plan. To be adopted.	Accommodation Services Division.	Q2 2019
3.2	Operationalise a hazing-specific framework to exist within residential policy.	✓	To be adopted.	Accommodation Services Division.	Q4 2019
3.3	Isolate record keeping of hazing data (incidences, reports and allegations.)	✓	Implemented.	Accommodation Services Division.	Q1 2019
3.4	Trauma informed support for hazing survivors and clearer reporting channels for hazing.	✓	To be adopted.	Accommodation Services Division. Student Support	Q2 2019

RECOMMENDATION FOUR

Item	Recommendations	Recommended for support	Suggested UOW Response/Progress	Lead for Accountability	Timeframe
4.1	All SASH risk factors be included in SASH prevention and response strategies.	✓	To be adopted.	Accommodation Services Division. Student Support	Q3 2019

LEGEND: ✓ Proposal recommended

- Proposal not endorsed

Item	Recommendations	Recommended for support	Suggested UOW Response/Progress	Lead for Accountability	Timeframe
4.2	SARC Action Plan include more active engagement with the UOW Allsorts Queer Collective and support UOW's participation in the Ally Network.	✓	Incorporated into SARC Action Plan. To be adopted.	SARC Working Party	Q1 2019
4.3	Utilise a three-tier assessment of all drinking practices and requests.	✓	Implemented.	Accommodation Services Division.	Q1 2019
4.4	Resources such as Alcocups and AlcoholEdu be included in 2019 training.	✓	Implemented.	Accommodation Services Division.	Q1 2019
4.5	All means of intervention be evidence based and reviewed regularly.	✓	This has been implemented and part of the SARC Action Plan.	Accommodation Services Division. SARC Working Party	Q4 2019

RECOMMENDATION FIVE

Item	Recommendations	Recommended for support	Suggested UOW Response/Progress	Accountability	Timeframe
5.1	Specific education and training to residents of the <i>Safezone</i> app.	✓	Implemented.	Accommodation Services Division.	Q1 2019
5.2	Adjust all the guests and visitor's sign-in policy to match that of Bangalay and Marketview.	✓	To be adopted and is partially implemented to date.	Accommodation Services Division.	Q2 2019
5.3	Consider a business case for night time security staff at Campus East and Marketview.)	✓	Business case to be developed.	Accommodation Services Division.	Q3 2019

LEGEND: ✓ Proposal recommended

- Proposal not endorsed

RECOMMENDATION SIX

Item	Recommendations	Recommended for support	Suggested UOW Response/Progress	Lead for Accountability	Timeframe
6.1	Leadership in residences focus on methods of enhancing physical and psychological safety.	✓	Implemented.	Accommodation Services Division.	Q2 2019 Ongoing
6.2	All UOW accommodation sites consider elements of the Kooloobong Village positive psychology program to strengthen pastoral care.	✓	Adopted to be implemented.	Accommodation Services Division.	Q4 2019 Ongoing
6.3	Availability of counsellors for residents to be monitored.	✓	Partially adopted and to be implemented.	Accommodation Services Division. Student Support	Q2 2019 Ongoing

RECOMMENDATION SEVEN

Item	Recommendations	Recommended for support	Suggested UOW Response/Progress	Lead for Accountability	Timeframe
7.1	Each senior leader promotes university values by taking responsibility for their leadership shadow.	✓	To be adopted.	Accommodation Services Division.	Q2 2019 Ongoing
7.2	Delineate each prevention strategy as either harm or risk reduction.	✓	To be adopted.	Accommodation Services Division.	Q3 2019
7.3	Minimum level training for all student leaders.	✓	Implemented and ongoing evaluation.	Accommodation Services Division.	Q3 2019 Ongoing
7.4	A broad harm reduction approach allowing for other configurations of demographics.	✓	Implemented and ongoing evaluation.	Accommodation Services Division Student Support	Q3 2019

LEGEND: ✓ Proposal recommended

- Proposal not endorsed

RECOMMENDATION EIGHT

Item	Recommendations	Recommended for support	Suggested UOW Response/Progress	Lead for Accountability	Timeframe
8.1	Accommodation provide students regular familiarisation with the <i>General Student Conduct</i> and <i>Student Conduct in Residences Policy</i> .	✓	Adopted to be implemented.	Accommodation Services Division.	Q4 2019
8.2	Language of student communication be more accessible and welcoming.	✓	Implemented and ongoing evaluation.	Accommodation Services Division.	Q4 2019

RECOMMENDATION NINE

Item	Recommendations	Recommended for support	Suggested UOW Response/Progress	Lead for Accountability	Timeframe
9.1	Harmonise SARC, SASH Support Services and Sexual harassment protocol reporting channels and information.	✓	To be adopted.	SARC Advisory Group SARC Working Party Accommodation Services Division.	Q3 2019
9.2	Review the <i>Critical Incident Policy</i> for managing SASH.	✓	To be adopted and partially implemented through external policy review.	Student Services Division Governance and Legal Division	Q2 2019
9.3	Procedures for ASD reporting SASH incidences be formalised and embedded into operational processes.	✓	To be adopted and partially implemented.	Accommodation Services Division.	Q2 2019
9.4	SARC website include what a student may expect when the listed resources are contacted.	✓	To be adopted.	Student Services Division	Q2 2019

LEGEND: ✓ Proposal recommended

- Proposal not endorsed