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Cost benefit analysis of the proposed National Higher Education Code to Prevent and Respond to Gender-based Violence

Commonwealth Department of Education

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Deloitte Access Economics

Contents

Glossary

The terminology used to discuss gender-based violence is evolving, and we acknowledge that the language does not work for all people impacted by violence. The Glossary and definitions throughout this evaluation are consistent with those used in the National Code, *National Plan to End Violence Against Women and Children 2022-2032,* and the *Action Plan Addressing Gender-based Violence in Higher Education*. When a term that is not defined in either of these documents is used, the alternative source is explicitly referenced.[1,2,3]

Term	Definition
The Action Plan	The Action Plan Addressing Gender-Based Violence in Higher Education.
ABS	The Australian Bureau of Statistics
The Bill	The Universities Accord (National Higher Education Code to Prevent and Respond to Gender-based Violence) Bill 2025 (Cth). The Australian Parliament had not passed the Bill at the date of writing this report.
CBA	Cost-benefit analysis
The Code	The National Higher Education Code to Prevent and Respond to Gender-based Violence.
The Department	The Commonwealth Department of Education.
Discloser	A person who has shared information about their experience of gender-based violence.
Disclosure	The provision of information about a person's experience of gender-based violence to a higher education provider by the discloser or another person.
Evidence-based	Describes models, approaches, or practices found to be effective through evaluation or peer-reviewed research. Evidence is usually published and may be found in full or summarised in academic research documents, organisational reports, program evaluations, policy papers, and submissions.
Formal report	The provision through formal reporting channels of information about an experience of gender-based violence by a discloser, which requires the higher education provider to consider taking steps beyond the offer and provision of support services, including (without limitation) the commencement of an investigation and/or a disciplinary process in appropriate circumstances.
Gender	The Bill provides that 'gender' is intended to be interpreted broadly in accordance with widely understood definitions of gender, such as the ABS definition of gender in the Standard for Sex, Gender, Variations of Sex Characteristics and Sexual Orientation Variables, 2020, which reads: *Gender is a social and cultural concept. It is about social and cultural differences in identity, expression and experience as a man, woman or non-binary person. Non-binary is an umbrella term describing gender identities that are not exclusively male or female.* *Gender includes the following concepts:* • *Gender identity is about who a person feels themself to be* • *Gender expression is the way a person expresses their gender. A person's gender expression may also vary depending on the context, for instance, expressing different genders at work and at home* • *Gender experience describes a person's alignment with the sex recorded for them at birth i.e. a cis experience or a trans experience.*

[1] Australian Government Department of Education, *Proposed National Higher Education Code to Prevent and Respond to Gender-based Violence 2025* (2025) <https://www.education.gov.au/action-plan-addressing-genderbased-violence-higher-education/resources/proposed-national-higher-education-code-prevent-and-respond-genderbased-violence-2025>
[2] Australian Government Department of Education, *Action Plan Addressing Gender-based Violence in Higher Education* (2024) <https://www.education.gov.au/action-plan-addressing-genderbased-violence-higher-education>
[3] Australian Government Department of Social Service, *The National Plan to End Violence against Women and Children 2022-2032* (2022) <https://www.dss.gov.au/system/files/resources/national-plan-end-violence-against-women-and-children-2022-2032.pdf>

Term	Definition
Gender-based violence	Gender-based violence (GBV) means any form of physical or non-physical violence, harassment, abuse or threats based on gender that results in, or is likely to result in, harm, coercion, control, fear or deprivation of liberty and autonomy physical violence or abuse. This includes (but is not limited to): • sexual violence, abuse or harassment • sex-based harassment • emotional or psychological abuse • verbal abuse or threats • economic or financial abuse • stalking or monitoring • intimate partner violence • family and domestic violence • technology-facilitated abuse • coercive control • sexual trafficking • reproductive coercion • female genital mutilation • forced medical interventions • forced marriage • a pattern or patterns of abusive behaviour.
HEP	Higher education provider
The National Plan	*The National Plan to End Violence against Women and Children 2022–2032.*
NSSS	The National Student Safety Survey.
People/person using violence	People using violence are also known as perpetrators or the accused in some system contexts. It refers to a person who commits an illegal, criminal or harmful act/s, including domestic, family or sexual violence or any form of gender-based violence. While alternative terminology may be used during different sections of the service system (for example, respondent, offender and perpetrator), the term 'people using violence' is consistent with the language adopted in the *National Plan to End Violence against Women and Children (2022–2032)*.
Registered Higher Education Providers	Registered higher education providers are higher education providers that are registered under the *Tertiary Education Quality and Standards Agency Act 2011* (Cth) (TEQSA Act). The TEQSA Act legally requires that all Australian higher education providers be registered under TEQSA. To be registered, these institutions must meet and continue to meet the standards set out in the *Higher Education Standards Framework (Threshold Standards) 2021*. For simplicity, this document will refer to registered higher education providers as higher education providers.
Respondent	A person who is alleged to have engaged in conduct that amounts to gender-based violence.
Secretary	The Secretary of the Department of Education.
Staff	As outlined in the Code, staff in this context has the same meaning as 'worker' under the *Work Health and Safety Act 2011*, which is: A person is a worker (staff) if the person carries out work in any capacity for a person conducting a business or undertaking, including work as: • an employee • a contractor or subcontractor • an employee of a contractor or subcontractor • an employee of a labour hire company who has been assigned to work in the person's business or undertaking • an outworker • an apprentice or trainee • a student gaining work experience • a volunteer • a person of a prescribed class.
SAPs	In the context of this report, student accommodation providers (SAPs) will refer only to those in scope for the provisions of the Code, which include:

Term	Definition
	• SAPs that are directly owned, operated, and/or managed by a registered higher education provider • SAPs which are not directly owned, operated or managed by a provider but are otherwise under the control of a registered higher education provider • SAPs that are not owned, operated, managed or under the control of a registered higher education provider, but are affiliated with a registered higher education provider, including (without limitation) by: o any statute, constitution or similar legal instrument that governs or otherwise regulates the Provider o having a service agreement or other agreement with the Provider; or o operating on the Provider's lands o being authorised by the Provider to use that Provider's intellectual property in its recruitment or marketing materials or on its website o being listed by the Provider on its website as 'student accommodation' or being promoted by the Provider in its recruitment or marketing material.
TEQSA	Tertiary Education Quality and Standards Agency.
TEQSA Act	*Tertiary Education Quality and Standards Agency Act 2011* (Cth). The TEQSA Act established TEQSA and provides it with its legislated objectives and regulatory powers.
Threshold Standards	The Higher Education Standards Framework (Threshold Standards) 2021
Victim-survivor	People who have experienced domestic, family, sexual or gender-based violence. In some system contexts, victim-survivors are also referred to as the aggrieved or complainants. This term is understood to acknowledge the strength and resilience shown by people who have experienced or are currently living with violence. People who have experienced violence have different preferences about how they would like to be identified and may choose to use victim or survivor separately, or another term altogether. Some people prefer to use 'people who experience or are at risk of experiencing violence'.

Executive summary

Background and purpose of this report

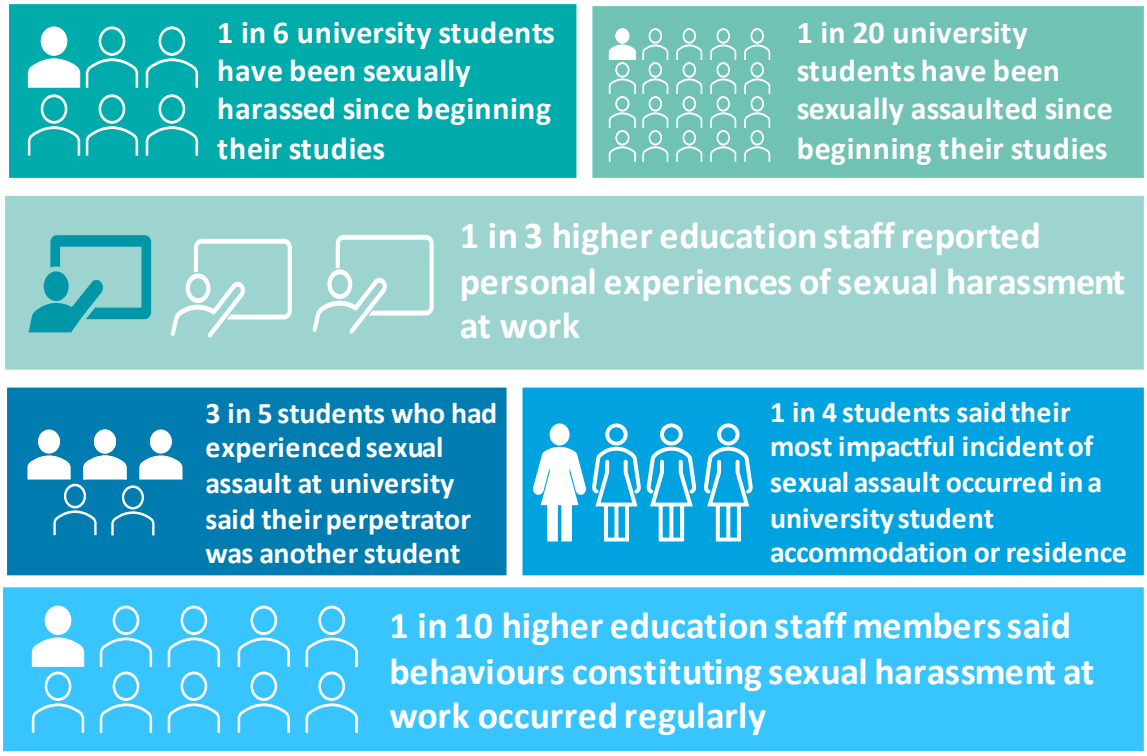
Gender-based violence (GBV) refers to any form of physical or non-physical violence, or harassment, abuse or threats based on gender that results in, or is likely to result in, harm, coercion, control, fear or deprivation of liberty and autonomy.[4] Although people of all genders can experience GBV, most victim-survivors of this type of violence are women, while most perpetrators are men.[5]

The 2021 Personal Safety Survey, conducted by the Australian Bureau of Statistics, revealed that in Australia, one in three women have experienced physical violence and one in five women have experienced sexual violence during their lifetime.[6] The La Trobe University Private Lives 3 survey indicates that transgender, non-binary and gender diverse people also face a disproportionate risk of experiencing GBV in their lifetime.[7] Victim-survivors impacted by these experiences (regardless of where they occur) often face lasting trauma, which affects their wellbeing, engagement, and performance across personal, academic, and professional contexts. This can have significant consequences for the long-term economic outcomes of victim-survivors. For instance, a 2025 report by the University of Technology Sydney found that in 2021-22 the employment rate for women who had experienced GBV was 5.3 percentage points lower than for women who had not.[8] Additionally, women who experienced GBV were less likely to attain a university degree compared to those who had not.

GBV is notably prevalent in the higher education sector, with recent studies reporting high rates of GBV affecting both students and staff (see Figure i).[9, 10, 11] The 2021 National Student Safety Survey found that one in six students at Australian universities has been sexually harassed and one in 20 have been sexually assaulted.[12] This report also found that students living in student accommodation may face a greater risk, with one in four of these victim-survivors indicating that their most impactful incident of sexual assault occurred in a university student accommodation or residence. University staff (including full time, part time and casual employees as well as volunteers) are also at risk with a recent report from the National Tertiary Education Union (NTEU) finding nearly a third (29 per cent) of university staff had a personal experience of sexual harassment, while half (50 per cent) were aware of others who have been sexually harassed.[13] Given historical underreporting and ongoing barriers to formal reporting and help-seeking, these prevalence figures likely underestimate the true extent of this issue.[14, 15]

[4] Australian Government Department of Education, *Proposed National Higher Education Code to Prevent and Respond to Gender- based Violence 2025* (2025) <https://www.education.gov.au/action-plan-addressing-genderbased-violence-higher-education/resources/proposed-national-higher-education-code-prevent-and-respond-genderbased-violence-2025>
[5] OurWatch, Quick Facts About Violence Against Women,' *OurWatch* (2025) < https://www.ourwatch.org.au/quick-facts>.
[6] Australian Bureau of Statistics, *Personal Safety, Australia* (2023) <https://www.abs.gov.au/statistics/people/crime-and-justice/personal-safety-australia/latest-release>
[7] Hill, A, et al, 'Private Lives 3: The health and wellbeing of LGBTIQ people in Australia'. (2020) *La Trobe University Australian Research Centre in Sex, Health and Society <https://www.latrobe.edu.au/__data/assets/pdf_file/0009/1185885/Private-Lives-3.pdf>*
[8] Summers, A, et al., 'The Cost of domestic violence to women's employment and education'. (2025) *University of Technology Sydney* <https://www.uts.edu.au/news/2025/02/cost-domestic-violence-womens-employment>
[9] Social Research Centre (SRC), 'National Student Safety Survey', *National Student Survey* (2022) <https://www.nsss.edu.au/results>
[10] National Tertiary Education Union, 'New survey reveals shocking rise in sexual harassment at universities', *National Tertiary Education Unit* (2023) <https://www.nteu.au/News_Articles/Media_Releases/Sexual_Harassment_Survey_Report.aspx>
[11] Australian Human Rights Commission, 'Change The Course: National Report on Sexual Assault and Harassment at Australian Universities', *Australian Human Rights Commission* (2017) <https://humanrights.gov.au/our-work/sex-discrimination/publications/change-course-national-report-sexual-assault-and>
[12] Social Research Centre (SRC), 'National Student Safety Survey', *National Student Survey* (2022) <https://www.nsss.edu.au/results>
[13] National Tertiary Education Union, 'New survey reveals shocking rise in sexual harassment at universities', *National Tertiary Education Unit* (2023) <https://www.nteu.au/News_Articles/Media_Releases/Sexual_Harassment_Survey_Report.aspx>
[14] Australian Government Department of the Prime Minister and Cabinet, *Unlocking the Prevention Potential: accelerating action to end domestic, family and sexual violence* (2024) <https://www.pmc.gov.au/resources/unlocking-the-prevention-potential>
[15] Social Research Centre (SRC), 'National Student Safety Survey', *National Student Survey* (2022) <https://www.nsss.edu.au/results>

Figure i Prevalence of GBV in Australia and the Australian higher education sector



Source: Social Research Centre (SRC), 'National Student Safety Survey', *National Student Survey* (2022) <https://www.nsss.edu.au/results>; National Tertiary Education Union, 'Sexual Harassment in the Workplace', *National Tertiary Education Union* (2023) <https://www.nteu.au/News_Articles/Media_Releases/Sexual_Harassment_Survey_Report.aspx>.

In 2017, the Australian Human Rights Commission issued nine recommendations for Higher Education Providers (HEPs) to drive structural and cultural reforms aimed at improving responses to sexual assault and harassment.[16] The Tertiary Education Quality and Standards Agency (TEQSA) later conducted an audit of HEPs' responses to these recommendations, which found that while many universities had adopted systems or policies that aligned with best practice, others, including non-university HEPs, had less comprehensive approaches to addressing the issue of gender-based violence.[17] Reports have also consistently identified student accommodation settings as an area in need of further action.[18,19]

HEPs are subject to regulatory obligations that establish minimum standards and positive duties for the safety of their students and staff, but current frameworks do not specifically address the complexities of GBV.[20] While many HEPs now have stand-alone policies on GBV or sexual violence as well as multiple reporting options, including anonymous reporting options, broader GBV prevention and response practices vary across the sector, and there has been limited systematic oversight of the effectiveness of these efforts.[21]

[16] Australian Human Rights Commission, 'Change The Course: National Report on Sexual Assault and Harassment at Australian Universities,' *Australian Human Rights Commission* (2017) <https://humanrights.gov.au/our-work/sex-discrimination/publications/change-course-national-report-sexual-assault-and>
[17] 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 harassment* (2019) <https://www.teqsa.gov.au/sites/default/files/sash-report-march-2019.pdf>
[18] Australian Human Rights Commission, 'Change The Course: National Report on Sexual Assault and Harassment at Australian Universities', *Australian Human Rights Commission* (2017) <https://humanrights.gov.au/our-work/sex-discrimination/publications/change-course-national-report-sexual-assault-and>
[19] Social Research Centre (SRC), 'National Student Safety Survey', *National Student Survey* (2022) <https://www.nsss.edu.au/results>
[20] Australian Government Department of Education, *National Higher Education Code to Prevent and Respond to Gender-based Violence: Issues Paper Appendix B* (2024) <https://www.education.gov.au/action-plan-addressing-genderbased-violence-higher-education/resources/national-higher-education-code-prevent-and-respond-genderbased-violence-issues-paper>
[21] Australian Human Rights Institute, 'How does your university respond to campus sexual violence?,' *UNSW Sydney* (2024) <https://www.humanrights.unsw.edu.au/sites/default/files/documents/How%20Australian%20Universities%20are%20Responding%20to%20Campus%20Sexual%20Violence%20-%20February%202024.pdf>

In this context, in July 2023, the Australian Universities Accord Interim Report highlighted the need to improve student and staff safety in university communities.[22] In response, Education Ministers released the *Action Plan Addressing Gender-Based Violence in Higher Education*, with seven actions to address GBV across the sector.[23] One of these actions was to introduce the National Higher Education Code to Prevent and Respond to Gender-based Violence (the Code).

The purpose of the Code is to drive systemic and cultural change across the higher education sector by establishing a sector-wide, evidence-based framework for HEPs to prevent and respond to GBV, including in student accommodation settings. The Code addresses any case of GBV where the victim-survivor or respondent is a staff member or student, regardless of where the experience occurred. The Code will form part of the broader regulatory framework for the higher education sector, being implemented and made legally enforceable under the Universities Accord (National Higher Education Code to Prevent and Respond to Gender-based Violence) Bill 2025 (Cth) (the Bill). The Code sets out seven standards that HEPs (including universities, independent and TAFE institutions) must comply with, focusing on:

- development and implementation of a whole of organisation approach to prevent and respond to GBV (including governance requirements)
- implementation of policies on preventing and responding to GBV (including conducting stakeholder consultations with students and staff)
- providing evidence-informed GBV education and training to students, leadership, and staff
- additional safety check requirements for current and future employees
- implementation of responses and support services that are person-centred and trauma-informed (including reporting pathways and disclosure and respondent processes)
- data collection and reporting on impacts to ensure approaches are evidence-based
- ensuring student accommodation services owned, managed, operated by and/or affiliated with HEPs are compliant with the National Code.[24]

The full details of the proposed Code and its requirements were published on the Department's website in February 2025.[25] Acknowledging the multi-layered problem, the Code is based on a comprehensive, whole-of-institution approach to preventing and responding to GBV in higher education. Across each of the seven standards, the Code aims to address the continuum of prevention, early intervention, response, recovery and healing. Collectively, these interconnected measures intend to drive systemic and structural change, create cultural, behavioural, and attitudinal change, and acknowledge that we all have a responsibility to end violence in accordance with the National Plan.[26] Each standard of the Code drives specific overarching actions to achieve these aims:

- leadership-driven change (Standard 1)
- strengthened policies and accountability mechanisms (Standard 2)
- education and training to shift attitudes and norms (Standard 3)
- person-centred support services (Standard 4)
- accessible and survivor-centred reporting options (Standard 5)
- data collection for ongoing improvement (Standard 6)
- the extension of these standards to student accommodation (Standard 7).

Deloitte Access Economics has been engaged by the Department of Education (the Department) to undertake a cost-benefit analysis (CBA) and regulatory burden reduction measurement (RBM) for the proposed introduction of the Code. The results of this work will be integrated into or attached to a wider Impact Analysis of the National Code being prepared by the Department. This CBA report assesses the impacts of the Code on students, staff (including volunteers), HEPs, and the Australian Government. This includes both costs and benefits associated with compliance with, and administration of, the standards outlined in the Code, including any changes in regulatory burden and unintended consequences.

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[22] Australian Government Department of Education, *Australian Universities Accord Interim Report* (2024) <https://www.education.gov.au/australian-universities-accord>

[23] Australian Government Department of Education, *Action Plan Addressing Gender-based Violence in Higher Education* (2024) <https://www.education.gov.au/action-plan-addressing-genderbased-violence-higher-education>

[24] Australian Government Department of Education, *Proposed National Higher Education Code to Prevent and Respond to Gender-based Violence 2025* (2025) <https://www.education.gov.au/action-plan-addressing-genderbased-violence-higher-education/resources/proposed-national-higher-education-code-prevent-and-respond-genderbased-violence-2025>

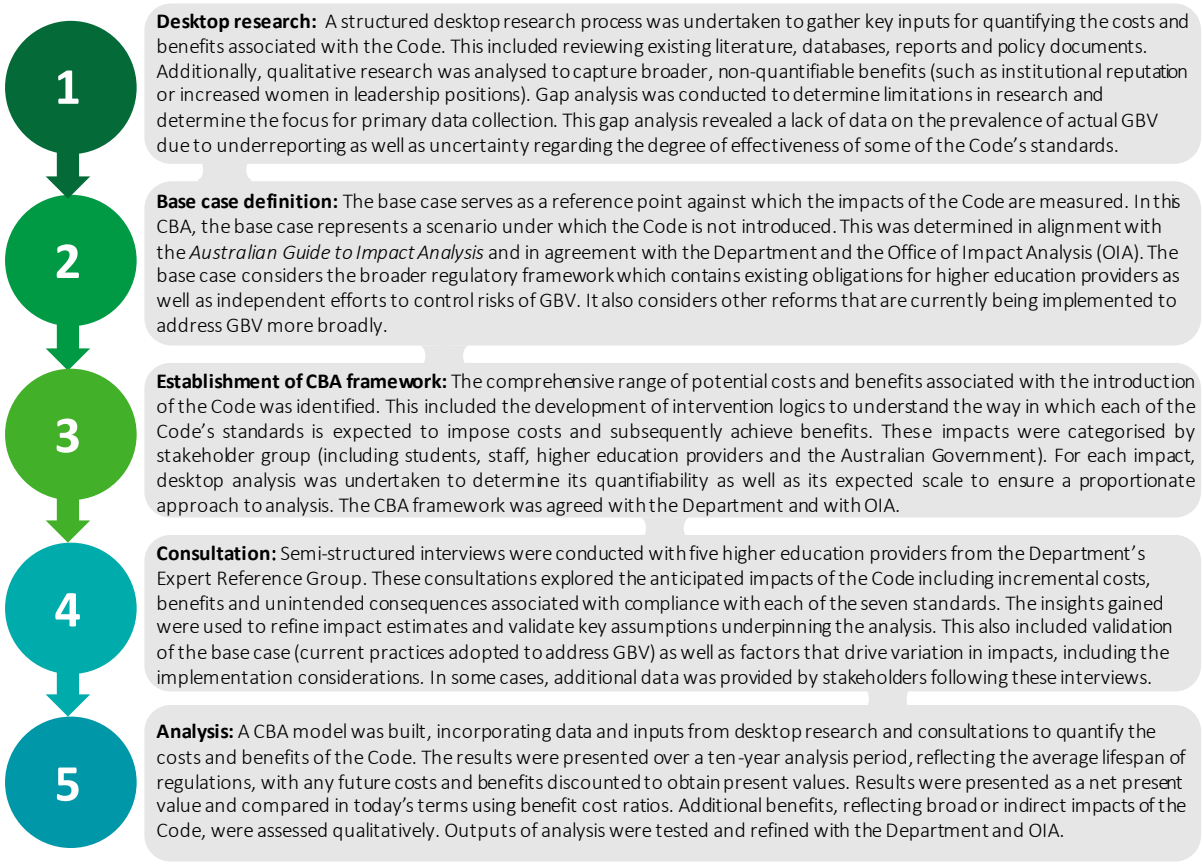
[25] Ibid.

[26] Australian Government Department of Social Service, *The National Plan to End Violence against Women and Children 2022-2032* (2022) <https://www.dss.gov.au/system/files/resources/national-plan-end-violence-against-women-and-children-2022-2032.pdf>

Approach to the analysis

CBA is a tool that supports evidence-based policy making by calculating the incremental costs and benefits of, in this case, a regulatory intervention relative to a comparative base case – that is, what would occur in the absence of the Code. To undertake this analysis, a five-step method has been applied to ensure an evidence-based approach to estimating impact (see Figure ii).

Figure ii CBA methodology



Source: Deloitte Access Economics, 2025.

This CBA was informed by structured desktop research to identify potential costs and benefits associated with the Code and determine the potential scale of these impacts. This research incorporated a wide range of sources to ensure robustness and depth of analysis. The evidence base for this CBA included (but is not limited to):

- quantitative data and documents provided by the Department
- government reports from large-scale commissions and inquiries, including those which make recommendations on GBV interventions in higher education
- reports and studies from research institutions such as the Australian Institute of Health and Welfare (AIHW) and the Social Research Centre (SRC)
- peer-reviewed academic journals
- grey literature from industry sources.

Through the research process, gaps and areas of uncertainty were identified in the existing literature and data sources. In some cases, available research addressed similar themes, such as workplace health and safety, but lacked specificity regarding students or staff in higher education settings. Other sources provided links between interventions and potential benefits but did not quantify their scale, indicate likely effectiveness, or provide evidence for all relevant benefits.

Additionally, national crime databases and prevalence studies do not currently capture the number of victim-survivors and perpetrators of GBV who are university students or staff. This gap hinders the accurate assessment of prevalence, incidence rates, and risk levels within the sector. Further, the lack of national data on the prevalence and experiences of transgender, non-binary, and gender-diverse students and staff with GBV in higher education settings limits the ability for this report to

estimate how the Code will impact this cohort. These gaps introduced uncertainty in quantifying the costs and benefits associated with the Code, requiring a structured approach to addressing these limitations to ensure that the findings remained as robust and reliable as possible.

Addressing the uncertainty in quantifying the costs and benefits

Structured desktop research and stakeholder consultation were undertaken to gather insights on the costs and benefits of the Code. Desktop research involved reviewing existing literature on GBV interventions, policy documents, and publicly available databases. This process highlighted limitations in the available evidence base, which created uncertainty in assessing the impacts of the Code. Uncertainty stems from several factors. Firstly, there is limited evidence on the precise effectiveness of GBV interventions. Second, the actual prevalence of GBV is unknown due to underreporting and the absence of a national perpetration study. Lastly, there is likely variation in HEP responses to the Code (this is due to the distinct risk profiles within different organisations and the degree to which their current policies, systems, and procedures reflect best practice).

Consultations with the Department's Expert Reference Group provided valuable insights into the perspectives of impacted stakeholders, including input on areas of uncertainty in understanding the obligations of the Code for HEPs and what practical actions would be required to achieve compliance. These discussions helped to verify key assumptions underpinning the categorisation of impacts and analytical approach. These consultations also highlighted that HEPs expect some uncertainty to remain until, and during, the implementation of the Code itself. Consultation with broader industry, including affiliated or associated Student Accommodation Providers (SAPs), staff, and students, was not in scope for this analysis. To estimate the costs to these stakeholders, this analysis relies on inputs and assumptions determined in consultation with the Department's Expert Reference Group.

This makes it difficult to estimate with precision the total expected economy-wide impacts of the proposed reform options. It is possible, however, to use this CBA to provide an illustrative estimate of feasible costs and potential benefits, subject to several assumptions, and to test and demonstrate the likelihood that the benefits outweigh the costs.

As an emerging area of health and safety, there is limited evidence on the precise effectiveness of GBV interventions

The Code aims to address the risk of harm to students and staff in the Australian higher education sector as a result of exposure to GBV.[27] Research shows that multi-faceted interventions that address the interdependent and layered drivers of GBV (including structural, societal, community, relationship, and individual factors) are most likely to contribute to its prevention.[28] Further, there is evidence to suggest that trauma-informed and person-centric approaches to response can have positive impacts on victim survivors.[29,30] The research and evidence base for these positive impacts emphasise not just that interventions with a wide range of overlapping or interacting components can have positive impacts, but that having a positive impact *requires* interventions that seek to improve or change multiple factors at once.[31]

While research establishes a link, there is limited evidence on the extent of improvement created by GBV interventions or the extent to which improvement can be attributed to any one aspect of these multi-faceted interventions. As a current focus area of regulatory reform, related interventions are still new, and their long-term effects on incidence rates are not yet clear. This impacts the degree of certainty with which estimates of exact effectiveness or impact of the Code can be made.

Research indicates high levels of underreporting for GBV, meaning that the actual incidence is unknown

The true incidence rate of GBV in society and higher education is unknown due to high levels of underreporting. While the Personal Safety Survey, a national prevalence study undertaken every four years, and recent surveys of students and staff in higher education settings indicate a high prevalence of GBV in Australia, these same studies also highlight low rates of

[27] Australian Government Department of Education, *Proposed National Higher Education Code to Prevent and Respond to Gender-based Violence 2025* (2025) <https://www.education.gov.au/action-plan-addressing-genderbased-violence-higher-education/resources/proposed-national-higher-education-code-prevent-and-respond-genderbased-violence-2025>

[28] Australian Government Department of Social Services, *Theory of Change 2022–2032: Under the National Plan to End Violence against Women and Children 2022-2032* (2022) <https://www.dss.gov.au/national-plan-end-gender-based-violence/resource/theory-change-2022-2032>

[29] Sperlich, M, et al., *Adopting a trauma-informed approach to gender-based violence across the life course. In Understanding gender-based violence: An essential textbook for nurses, healthcare professionals and social workers* (Cham: Springer International Publishing, 2021) 185.

[30] Chu, Y, et al., 'Outcomes of trauma-informed care on the psychological health of women experiencing intimate partner violence: a systematic review and meta-analysis' (2024) 31(2) *Journal of psychiatric and mental health nursing* 203.

[31] Arango, D et al., 'Interventions to Prevent or Reduce Violence Against Women and Girls: A Systematic Review of Reviews' (2014) The World Bank

disclosure and formal reporting contributing to low incidence rates. [32,33,34,35] The National Students Safety Survey suggests that, in Australian higher education settings, the reporting rate may be as little as three per cent.[36] Research attributes this underreporting to factors such as stigma, shame, and fear of reprisal.[37]

As a result, available data likely underrepresents the full extent of harm caused by GBV, making it difficult to accurately determine GBV prevalence and the rate of new incidence. The lack of reliable data also affects projections of a potential increase in disclosures and formal reports following the introduction of the Code. The scale of both the costs (as ongoing costs to HEPs are driven by the number of disclosures and the scope of prevention activity) and benefits (as reduced incidence directly impacts harm reduction) is impacted by this uncertainty. The analysis makes assumptions to reflect the extent of underreporting under the base case (i.e., under the current status quo) and how this will likely change over time.

Responses to the Code by HEPs may vary

The Code provides flexibility for HEPs to implement control measures that match the level of risk to their staff and students. This means impacts will depend on how individual HEPs change their current activities in response to the introduction of the Code. Stakeholder consultation with the Department's Expert Reference Group for this report identified several factors influencing this variation:

- HEP size
- relevant jurisdiction and existing laws
- the baseline rate of reporting and familiarity with GBV in each HEP
- the degree to which current activities undertaken by each HEP are evidence-based and promising practice.

While HEPs are taking varying levels of action to contribute to the commitment to end violence within a generation, several key barriers to addressing GBV have been identified. These barriers represent areas where HEPs consider they will require support with the implementation of the Code, and which may impact their ability to comply. These challenges include:

- GBV is a broad term which can take a wide range of forms, leading to uncertainty about what forms of GBV a HEP must be prepared to respond to in accordance with the Code and how to appropriately respond
- evidence-informed interventions can be complex and costly, presenting a barrier to adoption (for example, stakeholders highlighted that some activities, such as integrating datasets, can be resource-intensive and require higher levels of expertise than may be available in-house in the short-term)
- even when effective practices for preventing and addressing GBV are clear, translating these practices into clear, actionable steps for staff at all levels is a significant undertaking (for example, stakeholders who have already made substantial progress emphasised the effort required to embed best practices into everyday roles and processes at a whole-of-organisation level).

Noting this uncertainty among HEPs, this CBA presents illustrative scenarios of feasible impact and has been prepared based on a range of assumptions regarding the likely behaviours of HEPs in response to the introduction of the Code. The results of this CBA should be regarded as a test of whether the benefits of the Code are likely to exceed costs, rather than a point estimate of the specific impacts.

The benefit-cost ratio (BCR) of the proposed reforms may vary at a whole-of-economy level depending on alternative scenarios and HEP responses. Sensitivity analysis has been conducted to test the impact on the results of changes to key assumptions. These tests found that results were robust to different assumptions about disclosure and attribution rates, but sensitive to assumptions regarding the effectiveness of the Code.

While the Code will be implemented before uncertainties can be fully addressed, ongoing monitoring and evaluation throughout implementation and administration will provide valuable insights into its actual effectiveness and areas for future improvement.

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[32] Australian Bureau of Statistics, *Personal Safety, Australia* (2023) <https://www.abs.gov.au/statistics/people/crime-and-justice/personal-safety-australia/latest-release>
[33] Social Research Centre (SRC), 'National Student Safety Survey', *National Student Survey* (2022) <https://www.nsss.edu.au/results>
[34] National Tertiary Education Union, 'New survey reveals shocking rise in sexual harassment at universities', *National Tertiary Education Unit* (2023) <https://www.nteu.au/News_Articles/Media_Releases/Sexual_Harassment_Survey_Report.aspx>
[35] Australian Human Rights Commission, 'Change The Course: National Report on Sexual Assault and Harassment at Australian Universities', *Australian Human Rights Commission* (2017) <https://humanrights.gov.au/our-work/sex-discrimination/publications/change-course-national-report-sexual-assault-and>
[36] Social Research Centre (SRC), 'National Student Safety Survey', *National Student Survey* (2022) <https://www.nsss.edu.au/results>
[37] Stevens, L, et al.,' A critical analysis of gender-based violence reporting and evidence building applications (GBVxTech) for capturing memory reports' (2024) 14 *Frontiers in psychology* 1289817.

Accounting for the different forms of GBV and varying levels of risk in the quantification of costs and benefits

GBV can take many forms, both physical and non-physical as well as overt and subtle. Every case can impact a victim-survivor differently, and some forms can disproportionately impact different population cohorts.[38] This variation creates uncertainty when estimating the general scale of harm caused by GBV (both under the base case and the proposed Code) as the nature and severity of impacts, and the appropriate responses, differ between cases.

Further, as research on the subject continues to evolve, HEPs will be required to respond to new forms of GBV where there may be limited current research on the experiences of and impacts on victim-survivors. For example, an area of growing research is around technology-facilitated abuse, or technology-facilitated coercive control, which initial studies indicate can disproportionately impact young people.[39]

As a result, while this CBA presents an estimate of the harm caused by GBV to victim-survivors based on research available at the time of writing, there remains uncertainty around the actual number of students and staff affected by GBV and the overall scale of harm caused. This affects both the estimated costs (as ongoing costs to HEPs are driven by the number of disclosures) and benefits (as reduced rates of incidence directly determine harm reduction).

While all students and staff are expected to benefit from improved measures to prevent and respond to GBV, the scale of benefit is likely contingent upon the respective risk they face. For example, research suggests that men experience significantly lower rates of GBV than women.[40] Therefore, to prevent overestimating the impact of the Code, the core results of this CBA focus on a reduction in the GBV experienced by university students and staff who identify as female (i.e. those most at risk).

There are likely to be further distributional impacts on different cohorts of women, such as culturally and linguistically diverse women, women with disabilities, or First Nations women. While prevalence studies indicate that these cohorts face a disproportionate risk of experiencing GBV, it is difficult to determine the marginal benefit a prevented case or improved response would provide to such cohorts above the general benefit to all women. This uncertainty limits the ability of this CBA to estimate the distributional effects of the Code on different cohorts of women.

The CBA framework

The framework for this CBA is illustrated in Figure iii. The Code seeks to ensure HEPs create safe, respectful, and inclusive higher education environments with embedded and effective responses to GBV that prioritise safety, health, and wellbeing.[41] To do so, each standard introduces new legal obligations for HEPs, requiring additional activities to ensure compliance.

In the process of meeting these requirements, each of the seven standards of the proposed National Code will impose costs (in terms of financial and labour resources) on four key stakeholder groups: HEPs, staff of HEPs (including full-time, part-time time and casual employees as well as volunteers), students, and the Australian Government.

Costs associated with the Code

Each proposed standard of the Code will require stakeholders to allocate additional resources toward initial implementation and ongoing compliance. The types of costs were tested with stakeholders during consultation. The following costs have been assessed in this analysis:

- **cost to HEPs:** the costs to HEPs primarily include the opportunity cost of staff time, resource allocation for new activities, any financial or capital costs associated with updating processes, practices, and systems, and additional operating and administrative expenses, including costs associated with hiring new staff members to meet expertise requirements. In many cases, it is expected that costs will be proportionate to the size, number of resources, and current level of relevant in-house expertise within each HEP[42]

[38] Australian Government Department of Education, *Proposed National Higher Education Code to Prevent and Respond to Gender-based Violence 2025* (2025) <https://www.education.gov.au/action-plan-addressing-genderbased-violence-higher-education/resources/proposed-national-higher-education-code-prevent-and-respond-genderbased-violence-2025>

[39] Australian Government eSafety Commissioner, *Children and technology-facilitated abuse in domestic and family violence situations* (2020) <https://www.esafety.gov.au/research/children-and-technology-facilitated-abuse-in-domestic-and-family-violence-situations>

[40] Australian Bureau of Statistics, *Personal Safety, Australia* (2023) <https://www.abs.gov.au/statistics/people/crime-and-justice/personal-safety-australia/latest-release>

[41] Australian Government Department of Education, *Proposed National Higher Education Code to Prevent and Respond to Gender-based Violence 2025* (2025) <https://www.education.gov.au/action-plan-addressing-genderbased-violence-higher-education/resources/proposed-national-higher-education-code-prevent-and-respond-genderbased-violence-2025>

[42] The code applies to HEPs and affiliated/associated SAPs. As the majority of standards are for HEPs the discussion is framed in terms of HEPs, with compliance costs to SAPs being either passed on to HEPs for S1 to S6 or estimated as additional costs borne by SAPs.

  - Initial costs: one-off transition costs relating to time and effort required by staff to understand the proposed requirements, as well as the time and effort required to develop or update systems for incident data capture and reporting
  - Ongoing costs: yearly costs associated with compliance (including meeting requirements around staff expertise), monitoring, and reporting. These costs differ across standards, and some costs will increase with the number of disclosures within each HEP.[43]
- **cost to students, staff, and volunteers:** requirements for HEPS are also expected to create flow-on costs to students, staff, and volunteers. These costs stem from the time spent undertaking activities mandated by the Code, such as participating in mandatory training
- **cost to the Australian Government**: one-off transition and ongoing costs associated with implementation, administration, and enforcement.

Benefits attributable to the Code

The prescriptive requirements introduced under the Code aim to ensure consistency in the application of evidence-based processes for addressing and responding to GBV across the sector.[44] The standards are designed to work together to reduce the harm associated with GBV in higher education.[45]

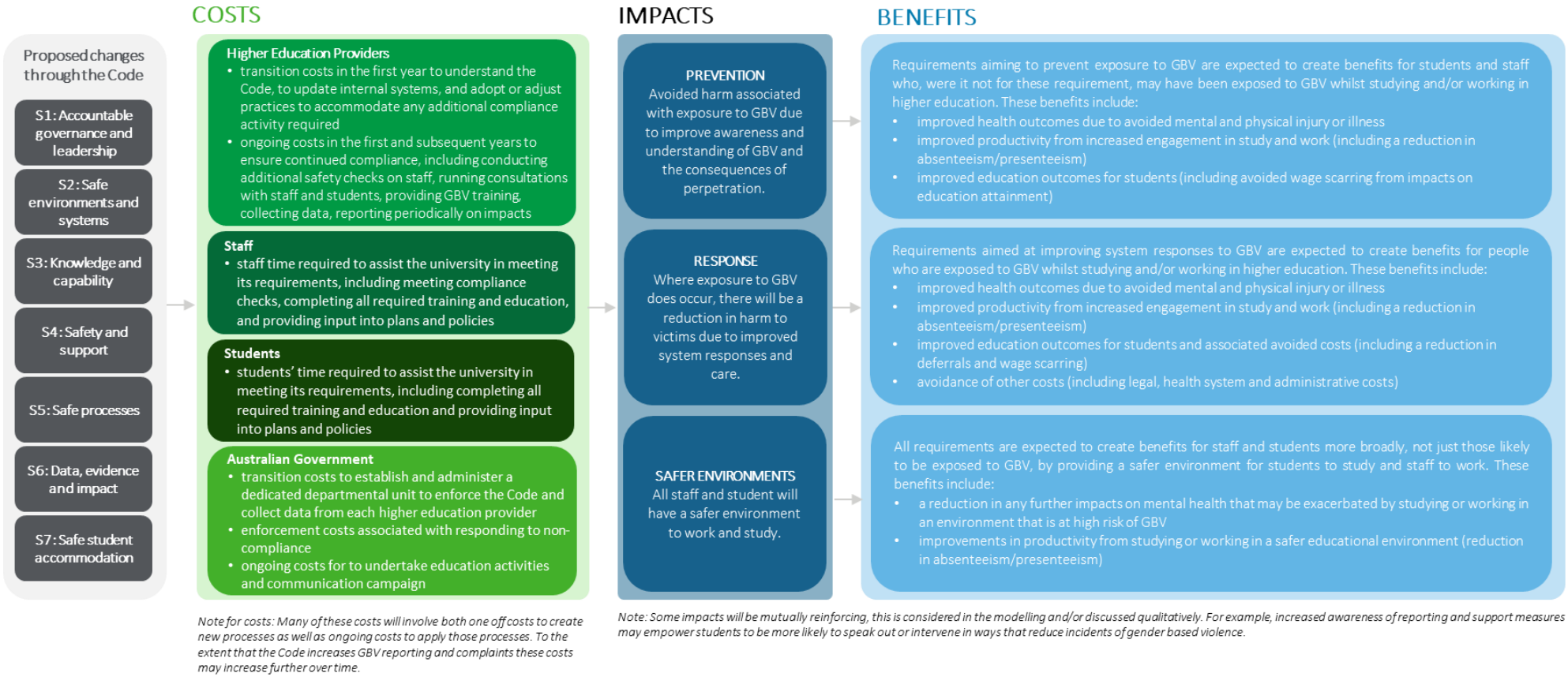
A reduction in this harm is intended to yield a wide range of physical, social, and emotional benefits to individuals, as well as cultural, financial, and reputational benefits to HEPs, healthcare systems, and the community at large.[46] Aside from the direct benefits of avoiding or reducing harm associated with GBV, broader benefits to both individuals and the economy, including the increase of women's participation in the workforce and leadership, improved student attraction to and retention in higher education, and changing social norms, have also been analysed.[47]

These benefits are expected to meaningfully improve individual well-being and avoid costs to HEPs, governments, health care systems, and the community. However, many broader, society-wide improvements are challenging to quantify and/or to attribute directly to the Code itself in isolation from other initiatives and reforms underway (see a more in-depth discussion of these benefits in Chapter 5). Because the potential benefits of the Code are only partially quantifiable, this CBA takes a conservative approach to benefits estimation by quantifying and monetising the more direct impacts of the Code and assessing the extent to which these are likely to offset the costs of actions undertaken as a result of the Code. The direct benefits assessed in this CBA accrue primarily to students and staff (including volunteers) and include:

- **safer environments**: improved safety on higher education campuses and in affiliated student accommodation facilities benefits all students and staff by reducing the risk of violence, promoting mental health, and enhancing overall mental wellbeing and productivity
- **improved responses**: providing better support for those who experience GBV will reduce ongoing harm and better mental health and educational outcomes for those who experience GBV
- **prevented exposure to GBV**: reducing the likelihood of GBV will protect students and staff from physical, emotional, and psychological harm, ultimately leading to improved long-term wellbeing, productivity, and educational outcomes.

[43] Increased reporting and therefore service utilisation may have implications for the existing workforce that currently works with people experiencing GBV. This may include specialist workforce as well as mainstream workforce such as general practitioners. There will be a need to consider these impacts and ensure the workforce is sufficiently skilled in managing the potential increased demand.
[44] Australian Government Department of Education, *Action Plan Addressing Gender-based Violence in Higher Education* (2024) <https://www.education.gov.au/action-plan-addressing-genderbased-violence-higher-education>
[45] Australian Government Department of Education, *Proposed National Higher Education Code to Prevent and Respond to Gender-based Violence 2025* (2025) <https://www.education.gov.au/action-plan-addressing-genderbased-violence-higher-education/resources/proposed-national-higher-education-code-prevent-and-respond-genderbased-violence-2025>
[46] Australian Institute of Health and Welfare, *Family, domestic and sexual violence: Health services* (2024) <https://www.aihw.gov.au/family-domestic-and-sexual-violence>
[47] Australian Institute of Health and Welfare, *Family, domestic and sexual violence: Economic and financial impacts* (2024) <https://www.aihw.gov.au/family-domestic-and-sexual-violence>

Figure iii CBA Framework



Note for costs: Many of these costs will involve both one off costs to create new processes as well as ongoing costs to apply those processes. To the extent that the Code increases GBV reporting and complaints these costs may increase further over time.

Note: Some impacts will be mutually reinforcing, this is considered in the modelling and/or discussed qualitatively. For example, increased awareness of reporting and support measures may empower students to be more likely to speak out or intervene in ways that reduce incidents of gender based violence.

Source: Deloitte Access Economics, 2025.

CBA Results

Total quantified costs of the Code and regulatory burden estimate

Per year, the additional regulatory burden estimated on key stakeholders is $173.2 million on average (undiscounted). In alignment with OIA's Regulatory Burden Measurement Framework, the average annual costs to businesses (including HEPs and HEP staff), community organisations, and individuals (including students and volunteers) are outlined in Table i. The OIA Regulatory Burden Measurement Framework considers regulatory burden as including costs to individuals, communities, and businesses only. As such, Australian Government costs of $4.7m have been omitted from the regulatory burden estimates. Therefore, the total annual average costs of the Code are $177.9m per year, equal to the regulatory burden of $173.2 million plus the cost to the Australian Government of $4.7 million.

Table i Regulatory burden estimate (RBE) table

Change in costs ($ million)	Business (HEPs, SAPs, and HEP staff)	Community organisations	Individuals (Students and volunteers)	Total change in costs
Total, by sector	$159.0m	$0m	$14.2m	**$173.2m**

Source: Deloitte Access Economics, 2025.

It is important to note that this CBA only considers the direct cost implications of introducing the Code. As a result, while this CBA does not include estimated costs to community organisations, it is acknowledged that if the Code successfully increases GBV reporting, more victim-survivors (and potentially perpetrators) will seek support. This may increase demand and ultimately costs for external GBV and broader mental and physical health support services. This is consistent with the conventional approach in CBA, which accounts for direct impacts and those where there is a higher degree of confidence. Noting that impacts on community organisations would be secondary or indirect impacts, they are considered challenging to estimate with confidence prior to implementation of the Code.

In total, across all standards, the introduction of the Code is expected to impose $1.2 billion in costs across all stakeholders (PV over ten years). The total costs to each stakeholder group are outlined in Table ii. Standards 2 and 3 are the costliest, making up 22 and 56 per cent of total costs respectively.

Table ii Total costs of the Code in present value over ten years by stakeholder group

Stakeholder group	Present value over ten years
HEPs	$754.1m
Students	$71.7m
HEP staff	$305.9m
Volunteers	$23.7m
Australian Government	$32.7m
Total	**$1.2b**

Source: Deloitte Access Economics, 2025.

Of the total costs, approximately 90 per cent are likely to be borne by HEPs (this includes staff costs, whose time is ultimately an institutional expense). Across all standards, the average transition and ongoing costs to each HEP are outlined in Table iii. This cost differs depending on the size of the provider (where the size of the provider is determined by the percentage of total Australian higher education students enrolled at that provider). Average transition costs are in addition to the average ongoing costs per provider in the first year of implementation and are associated with system and process upgrades.

Table iii Average cost of Code to HEPs across standards, by HEP size

Provider size	Average transition cost per provider (first year of implementation)	Average ongoing cost per provider (each year over a ten-year period)
Small	$166,000	$231,000
Medium	$254,000	$5.3m
Large	$351,000	$8.1m

Note: All costs have been rounded to the nearest thousand.

Source: Deloitte Access Economics, 2025.

The undiscounted costs per year outlined in Table iv show changes in costs over ten years. The costs change due to several factors including increases in compliance, the reporting of GBV, and the number of students and staff. The present value of the total costs is estimated at $1.2 billion, calculated using a 7 per cent real discount rate in accordance with OIA guidelines. This figure reflects the discounted value of the undiscounted costs of $1.8b, which corresponds to total average annual undiscounted costs for approximately $177.9 million.

Table iv Total undiscounted costs per year, 2026-35

Year	Total costs (including government costs) (undiscounted)	Present value of total costs (7% real discount rate)	Regulatory burden (Total costs excluding government costs) (undiscounted)
2026	$124.3m	$116.1m	$119.9m
2027	$103.4m	$90.3m	$98.7m
2028	$124.8m	$101.8m	$120.0m
2029	$153.4m	$117.0m	$148.5m
2030	$181.2m	$129.2m	$176.8m
2031	$193.4m	$128.9m	$188.9m
2032	$206.2m	$128.4m	$201.5m
2033	$219.4m	$127.7m	$214.7m
2034	$233.3m	$126.9m	$228.4m
2035	$239.8m	$121.9m	$234.7m
Total (10 years)	**$1.8b**	**$1.2b**	**$1.7b**
AVERAGE (undiscounted)	**$177.9m**		**$173.2m**

Source: Deloitte Access Economics, 2025.

Total quantified benefits

The total economy-wide benefits of the Code are derived by combining the individual benefit streams associated with the prevention of GBV on campus, improved responses to disclosures and formal reports of GBV and improved safety within HEPs. Each benefit stream represents a distinct yet complementary impact. Prevention addresses harm before GBV occurs, improved responses ensure timely and effective support for those affected by GBV, and improved safety contributes to a

more supportive and productive environment for all students and staff. Together, these streams aim to capture the Code's potential to create positive change across higher education, improving wellbeing, productivity, and education outcomes.

Over the ten-year analysis period, it is feasible that the Code could yield benefits of at least $3.5 billion in present value. This translates to approximately $533.7 million in benefits per year on average (undiscounted). It is important to note that, in reality, benefits may take longer to materialise, particularly where system-level change is required to have a real impact. In this case, benefits would be delayed or deferred beyond the analysis period.

These estimates assume that the Code achieves benefits equal to its costs in each of the three benefit areas. There is strong evidence supporting the likely achievement of these levels of effectiveness for two key benefit streams: the prevention of GBV on campus and improved campus safety. Achieving the required levels of effectiveness for improving responses to disclosures (approximately half the harm experienced by staff and students as a result of exposure to GBV is reduced for those who disclose or formally report a case GBV) is more challenging but feasible if, as intended, there is a high standard of implementation, enforcement and ongoing evaluation of the Code and its requirements.

The realisation of these benefits is considered feasible given the conservative assumptions made for each benefit stream within this analysis, and that peer-reviewed studies of similar interventions suggest the potential effectiveness of the Code may be stronger.[48, 49] Further, the actual total benefits are likely to be higher than the quantified estimates in this CBA, given the additional benefits that have not been quantified, including the benefits:

- to other individuals who may not identify as female
- to perpetrators of GBV (including behaviour change and reduced reoffending, improved relationships, avoidance of legal consequences)
- of improvements in women's workforce participation
- of increased attraction and retention for HEPs
- of broader improvements in community safety.

Sensitivity analysis of key assumptions underpinning these results highlights that the results are very sensitive to assumptions about the effectiveness of the Code in reducing harm. Since the benefits are directly linked to the level of effectiveness achieved, the BCR varies depending on whether the actual effectiveness rate falls short of or exceeds expectations. However, as all three benefit components are cumulative, even substantial variations in the effect of the Code on any one benefit stream still result in total benefits outweighing costs.

The evidence base for each of the estimated benefit streams, including limitations in that evidence and how the analysis in this report has addressed or worked with those limitations, is set out below.

Improved safety for all female students and staff in HEPs

The Code aims to ensure students and staff feel safe regardless of where they study, work, or live.[50] If effective in improving this sense of safety, the Code will generate wellbeing and productivity benefits for all students and staff who identify as female (female students and staff) (including volunteers), regardless of whether they will, or would have, experienced GBV.[51]

This analysis suggests that a marginal improvement in psychosocial safety (from high risk to medium risk) for just 1 in 4 students and staff would be sufficient to equal the costs of the Code. This threshold represents the minimum level of effectiveness required before the Code can be considered to yield a net benefit, even if the only benefit it achieves is an improvement in the sense of safety of students and staff.

At this breakeven point, the total economy-wide benefits of improved safety are estimated at approximately $1.2 billion in present value over ten years, with an average annual benefit of approximately $177.9 million.

The existing literature on GBV interventions broadly establishes a link between improvements in perceptions of safety and wellbeing and productivity benefits. Studies do not provide a specific evidence base for the impact of a reduction in the risk

[48] Garzón, S, et al., 'Effectiveness of a prevention program for gender-based intimate partner violence at a Colombian primary school' (2020) 10 *Frontiers in psychology* 3012.
[49] Cronin, M, et al., 'Testing the effectiveness of interactive training on sexual harassment and assault in field science' (2024) 14(1) *Scientific reports* 523.
[50] Australian Government Department of Education, *National Higher Education Code to Prevent and Respond to Gender-based Violence: Issues Paper Appendix B* (2024) <https://www.education.gov.au/action-plan-addressing-genderbased-violence-higher-education/resources/national-higher-education-code-prevent-and-respond-genderbased-violence-issues-paper>
[51] Becher, H, et al., 'Psychosocial Safety Climate and Better Productivity in Australian Workplaces.' (2016) *Safe Work Australia, University of South Australia* <https://www.safeworkaustralia.gov.au/system/files/documents/1705/psychosocial-safety-climate-and-better-productivity-in-australian-workplaces-nov-2016.pdf>

of GBV on campus in terms of direct benefits to students and staff. However, there is a well-established body of research on psychosocial safety in workplaces that uses Psychosocial Safety Climate (PSC) as an indicator of psychosocial risk. Psychosocial risks are aspects of the design, management, and social context of work and study that have the potential to cause psychological or physical harm. PSC is measured through a validated 12-question survey and is routinely used to assess psychosocial risk levels in workplace settings.

A substantial peer-reviewed literature base examines the correlation between PSC and various negative outcomes, including impacts on mental wellbeing and productivity of impacted workers (including presenteeism and absenteeism). These studies have demonstrated a link between high PSC levels and increased harm, particularly for individuals with existing mental health conditions but also for the broader population. These findings are grounded in empirical evidence that establishes a clear relationship between improved psychosocial conditions in workplaces and measurable benefits in wellbeing and productivity.

Given that the Code aims to mitigate harms that directly affect the psychological wellbeing of students and staff in higher education settings, these estimates provide a reasonable proxy for the potential benefits of the intervention (including early intervention). While primary studies focus on workplace environments, the impact on students may differ in practice. However, in the absence of higher education-specific evidence, this approach is considered to provide the most reliable estimates within this context.

Using this approach, this analysis estimates that for those with existing mental health conditions, the wellbeing benefits of a marginally safer environment are valued at approximately $11,000 per person annually.[52,53] This represents the harm avoided for individuals whose mental health could deteriorate as a result of living, working, or studying in an environment that is of high psychosocial risk. This represents the avoided costs associated with reduced health (using cost of illness methodology and disability adjusted life years as a measure of this benefit (DALYs)) ... Additionally, regardless of mental health status, all students and staff who benefit from a reduction in psychosocial risk will experience productivity gains estimated at $110 per person annually due to reduced absenteeism and presenteeism.[54]

A key assumption of this model is that it only considers GBV experienced by university students and staff who identify as female. While people of all genders experience gender-based violence, GBV is most often used to describe violence against women, because most GBV is perpetrated by men against women.[55,56] While male students and staff also experience GBV, research suggests that they experience significantly lower rates of GBV than women.[57] As a result, applying female incidence rates to men would likely overstate their actual experiences of GBV. While research indicates that transgender, non-binary and gender diverse people also face a disproportionate risk of experiencing GBV in their lifetime, the lack of comprehensive data on the number of students and staff who identify as transgender, non-binary and/or gender diverse and how GBV impacts this cohort over their lifetimes, limits the ability for this CBA to estimate the impact of the Code on this cohort.

In reality, the widespread and systematic nature of the Code means that, to some degree, all students could experience improvements in their sense of safety. If this were the case, benefits would exceed this minimum threshold. The estimate is also inherently conservative, as it only focuses on reducing risk from high to medium level rather than reducing risk to lower levels for at least some staff or students. If the Code leads to even greater safety improvements, the total benefits would also be higher. This threshold of an improvement in psychosocial safety for 1 in 4 students and staff is therefore considered feasible to achieve through the introduction of the Code.

Sensitivity analysis has been conducted to determine the additional benefits that may accrue if students and staff of all genders yield benefits. Holding effectiveness constant, the additional benefits associated with broader improvements in

[52] The Australian Bureau of Statistics (ABS) suggests that approximately one third of the working population has or has had a mental health condition. ABS, 'Mental Health Statistics.' (2018).
[53] This analysis quantifies the benefits to students and staff in cases where the level of psychosocial risk they are exposed to while they study, or work is reduced from high risk to medium risk. This risk level is determined using an assumption that all high education providers are currently considered high risk when measuring psychosocial safety climate (PSC). PSC is used to measure worker's workplace safety experience of "policies, practices and procedures for the protection of worker mental health and safety."
[54] This represents the reduction in the average annual cost of absenteeism and presenteeism per person employed in a workplace with a high-risk PSC rating (compared to a medium-risk PSC rating).
[55] Australian Government Department of Education, *National Higher Education Code to Prevent and Respond to Gender-based Violence: Issues Paper Appendix B* (2024) <https://www.education.gov.au/action-plan-addressing-genderbased-violence-higher-education/resources/national-higher-education-code-prevent-and-respond-genderbased-violence-issues-paper>
[56] Australian Bureau of Statistics, *Personal Safety, Australia* (2023) <https://www.abs.gov.au/statistics/people/crime-and-justice/personal-safety-australia/latest-release>
[57] Australian Government Department of Social Service, *The National Plan to End Violence against Women and Children 2022-2032* (2022) <https://www.dss.gov.au/system/files/resources/national-plan-end-violence-against-women-and-children-2022-2032.pdf>

campus safety to all students and staff could be up to $162 million. Noting this does not differentiate between students and staff in terms of risk.

Improved responses to disclosures and formal reports

The Code is also intended to ensure that those affected by GBV receive timely and effective support.[58] If effective, the Code should reduce the ongoing harm to those students and staff who experience GBV, regardless of where the harm physically occurs, by providing both disclosers and respondents with access to safe and person-centred responses and support planning, including support services, disciplinary actions, and ongoing risk assessments.

This CBA estimates that the total economy-wide benefits of enhanced GBV responses are estimated at $1.1 billion in present value over ten years, with an average annual benefit of $177.9 million.[59] This is based on the estimate that each disclosure of GBV is associated with a potential ongoing yearly cost of $57,500 for students and $15,000 for staff, reflecting the impact on wellbeing, productivity (including disengagement from work), and educational attainment imposed on individuals by exposure to GBV.

Based on these values and in isolation of all other benefits, if the Code reduces ongoing harm by approximately half (51 per cent) for staff and students who disclose or formally report GBV, the resulting benefits will outweigh the costs. This is regardless of whether the exposure to GBV occurs on or off campus. This represents the minimum level of improvement required before the Code can be considered to yield a net benefit, even if the only benefit it achieves is an improvement in disclosure outcomes (or reduction in ongoing harm) in response to GBV disclosures and formal reports alone.

Peer-reviewed journal articles suggest that trauma-informed, person-centric responses can lead to improved recovery outcomes for victim-survivors in the future, thereby reducing ongoing levels of potential harm.[60,61] These journals also show that support for alleged perpetrators can lead to changed behaviours, enhanced accountability, and a reduction in the risk of re-perpetration.[62]

To determine the extent to which those who may be exposed to GBV may experience ongoing harm, as well as how effective improving institutional responses to disclosures or formal reports of GBV may be in reducing this harm, this analysis draws from previous quantitative modelling undertaken by Deloitte and evidence from peer-reviewed journal articles.

Previous analysis was undertaken by Deloitte to quantify the economic costs of sexual harassment in the workplace, which considers impacts on wellbeing, productivity, and broader economic costs.[63] This research applies a cost-of-illness methodology, a well-established approach for quantifying the economic burden of harm, which draws upon survey data and other quantitative inputs. While this framework was developed for workplace settings and focuses on overt or high-risk presentations of sexual harassment in particular, it provides a useful proxy for estimating the potential benefits of the Code. However, as with broader safety benefits, it is important to acknowledge that the impact on students may differ in practice.

To better capture the specific costs to students associated with disruptions to their education, additional data and peer-reviewed literature were incorporated. Journal articles on the impact of wage scarring due to non-completion serve as reasonable estimates for the long-term financial consequences to those students who may be exposed to GBV and discontinue their studies as a result. Additionally, Departmental data on the cost of a degree was used to estimate the avoided financial burden of repeating units due to GBV-related disruptions. These costs were weighted across different student cohorts, including domestic and international students, and adjusted for variations in degree type to reflect differences in financial impact.

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[58] Australian Government Department of Education, *National Higher Education Code to Prevent and Respond to Gender-based Violence: Issues Paper Appendix B* (2024) <https://www.education.gov.au/action-plan-addressing-genderbased-violence-higher-education/resources/national-higher-education-code-prevent-and-respond-genderbased-violence-issues-paper>

[59] This CBA used break-even analysis to determine the effectiveness level required for each benefit stream to offset the Code's costs. Benefit streams differ in timing, for example, prevented assaults count avoided costs in a single year, while improved GBV responses capture ongoing annual cost reductions. After discounting, the present values of benefits at break-even effectiveness range from $1.1 billion to $1.2 billion.

[60] Sperlich, M, et al., *Adopting a trauma-informed approach to gender-based violence across the life course. In Understanding gender-based violence: An essential textbook for nurses, healthcare professionals and social workers* (Cham: Springer International Publishing, 2021) 185.

[61] Chu, Y, et al., 'Outcomes of trauma-informed care on the psychological health of women experiencing intimate partner violence: a systematic review and meta-analysis'(2024) 31(2) *Journal of psychiatric and mental health nursing* 203.

[62] Victorian Government Family Violence Reform Implementation Monitor, *Evidence base for perpetrator interventions* (2023) <https://www.fvrim.vic.gov.au/monitoring-victorias-family-violence-reforms-service-response-perpetrators-and-people-using-violence-within-family/evidence-base-perpetrator-interventions>

[63] Deloitte Access Economics, *The economic costs of sexual harassment in the workplace* (report for the Sexual Harassment National Inquiry, March 2019) <https://www.deloitte.com/content/dam/assets-zone1/au/en/docs/services/economics/deloitte-au-economic-costs-sexual-harassment-workplace-240320.pdf>

Furthermore, this breakeven point is considered feasible given that system-wide improvements expected under the Code are intended to enhance outcomes for all individuals who disclose or formally report GBV. This was supported by stakeholder consultation with HEPs, which suggested that improved processes for responses have broad benefits for all stakeholders, including HEPs who may also experience efficiency gains. The efficiency gains HEPs could experience from providing an improved response process include a potential reduction in administrative and operational costs and resources associated with legal issues, insurance, and civil claims, as well as the avoidance of duplicated work through matters being readily dealt with. While a numerical improvement in recovery rates is unable to be quantified, there is substantial evidence supporting the effectiveness of trauma-based, person-centric support services and improving recovery outcomes.

Prevention of physical and sexual assault on campus

By addressing the drivers of GBV, the Code aims to prevent exposure to GBV.[64] Preventing GBV before it occurs eliminates the long-term harms that can have adverse effects on individuals.[65] This CBA quantifies the avoided costs to individuals in terms of physical and psychological trauma, earnings lost while injured and lost long-term earning potential.

This CBA estimates that the total economy-wide benefits of preventing physical and sexual assault on campus are estimated at $1.2 billion in present value over ten years, with an average annual benefit of $178.9 million. These benefits are based on estimated avoided costs of $364,000 if the individual is a student, and $260,000 if the individual is a staff member.

Based on these values, the analysis indicates that if the Code prevents just 1.2 per cent of physical and sexual assault cases on campus (equivalent to approximately 414 cases per year across 211 providers), the benefits would equal the costs of implementation. This threshold represents the minimum level of effectiveness required before the Code can be considered to yield a net benefit, even if the only benefit it achieves is avoided cases of physical and sexual assault. This represents the minimum level of improvement required for the Code to be considered worthwhile based on the prevention of physical and sexual assault alone.

Given existing research showing that targeted GBV interventions (including early intervention) in educational settings can reduce all forms of sexual violence and bullying by approximately 3 per cent, the actual benefits of prevention could be as much as twice as high as the breakeven point, resulting in up to $2.7 billion (in present value) over ten years.[66,67] However, given that the Code is the first of its kind in introducing a prescriptive approach to preventing and addressing GBV in higher education settings, there is uncertainty regarding its direct and attributable impacts. As such, the analysis adopts conservative assumptions, particularly in relation to prevention, as this may be the hardest benefit to achieve and/or take the longest to occur.

This analysis draws upon a range of sources to calculate a feasible estimate of the scale of this benefit. However, given that current research on this topic largely focuses on high-risk presentations of GBV, namely physical and/or sexual assault, the figures in this section estimate the benefit of preventing cases of physical and sexual assault on campus, and therefore will likely underestimate the broader benefit of preventing all forms of GBV.

First, this analysis draws on previous work undertaken by Deloitte to estimate the value of a psychological workplace injury.[68] This draws upon data on the average value of a workers' compensation claim for a psychological injury as a result of exposure to psychosocial harms (including those caused by GBV such as sexual assault, harassment, and abuse). This is considered a good proxy for the total harm to a victim-survivor as workers' compensation aims to compensate an injured worker for the total pain and suffering, medical costs, and lost income over the lifetime of their injury. The average value of a claim for psychological injury is approximately $260,000 (adjusted to 2024 dollars).

Peer-reviewed journal articles were used to validate these figures. A study on the lifetime economic burden of sexual assault also estimates costs at approximately $260,000, incorporating both immediate and long-term impacts on health,

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[64] Australian Government Department of Education, *National Higher Education Code to Prevent and Respond to Gender-based Violence: Issues Paper Appendix B* (2024) <https://www.education.gov.au/action-plan-addressing-genderbased-violence-higher-education/resources/national-higher-education-code-prevent-and-respond-genderbased-violence-issues-paper>

[65] Peterson, C, et al., 'Systematic review of violence prevention economic evaluations' (2021) 60(4) *American journal of preventive medicine* 552.

[66] Cahill, H., et al., *A social network analysis and implementation study of an intervention designed to advance social and emotional learning and respectful relationships in secondary schools*. Australia's National Research Organisation for Women's Safety (ANROWS, 2023) 95.

[67] Billions of dollars' worth of avoided costs is considered commensurate with the scale of harm associated with gender-based violence more broadly. A report on the cost of violence against women and their children in Australia estimated the cost of FDV more broadly to be approximately $27 billion (adjusted to 2024 dollars). KMPG, '

[68] Deloitte Access Economics, *The economic costs of sexual harassment in the workplace* (report for the Sexual Harassment National Inquiry, March 2019) <https://www.deloitte.com/content/dam/assets-zone1/au/en/docs/services/economics/deloitte-au-economic-costs-sexual-harassment-workplace-240320.pdf>

productivity, and quality of life.[69] Noting that these figures represent the likely harm to staff as a result of GBV, additional research was undertaken to quantify the additional harm to students associated with disruptions in their education.

Peer-reviewed literature on wage scarring suggests that being exposed to GBV as a young person can cause long-term educational and career disruptions for students, lowering academic engagement and poorer academic performance, which translates into significant lifetime income losses.[70] In addition, the impacts on wellbeing and productivity, these studies suggest that experiencing GBV is likely to cost students an additional $104,000 (approximately) on average across their lifetime in lost earnings.[71]

Total quantified impact of the Code

In this CBA, the costs associated with each standard are aggregated and compared to the benefits of the Code as a whole. This is to reflect the fact that the standards are intended to work together on a continuum to achieve benefits. The difference between the benefits the Code delivers (e.g., incremental benefits and improvements in the form of increased safety and wellbeing) and the cost of additional time, effort and other resources to implement the Code is measured both in terms of net present value (NPV) of the total costs and benefits, as well as the BCR).

The BCR refers to the scale of quantified benefits relative to quantified costs, expressed in the form of a ratio (where benefits are divided by costs). A BCR greater than one indicates that the quantified benefits related to the Code are greater than quantified costs (or, for every $1 of cost incurred, a benefit of greater than $1 is achieved). As such, any BCR that is equal to or greater than one can be expected to result in a positive impact in aggregate.

This CBA indicates that, even when considering just two of the three quantified benefit streams (prevention of physical and/or sexual assault on campus and broader safety improvements for all female students and staff), the Code is likely to achieve a BCR of at least 2. If the third benefit stream (improved responses to disclosed cases of GBV) is also realised, it is considered feasible that the Code could achieve a BCR of 3. This outcome would be dependent on effective implementation, robust compliance monitoring, and regular evaluation to ensure strong recovery outcomes in response to disclosures.

When accounting for additional potential benefits, including impacts on staff and students who do not identify as female and other unquantifiable benefits (for example, increased participation in the workforce and leadership positions), the BCR for the Code is considered likely to exceed 3. This is supported by evidence from literature and research on the scale of impact that broadly similar interventions have been able to achieve.

In total, the results of the CBA suggest that the Code is likely to create a net benefit of approximately $2.3 billion in net present value over ten years, or approximately $355.8 million per year (on average). The overall analysis estimates an annual regulatory burden cost of $173.2 million (which does not include the annual Australian Government costs of $4.7m) and a total cost of $1.2 billion over 10 years (present value), primarily incurred by HEPs for staff time, system changes, training, and support services. It is estimated that the Code could generate benefits of $533.7 million per year on average, totalling $3.5 billion over 10 years, resulting in a benefit-cost ratio of 3.

Table v Primary CBA results

	Present value over ten years	Average annual (undiscounted)
Total costs	$1.2b	$177.9m
Total benefits	$3.5b	$533.7m
Net benefit	**$2.3b**	**$355.8m**
BCR	**3.0**	**3.0**

Source: Deloitte Access Economics, 2025.

[69] Peterson, C, et al., 'Lifetime economic burden of rape among US adults' (2017) 52(6) *American journal of preventive medicine* 691.
[70] Macmillan, R, 'Adolescent victimization and income deficits in adulthood: Rethinking the costs of criminal violence from a life-course perspective' (2000) 38(2) *Criminology* 553.
[71] Brush, L, 'Effects of work on hitting and hurting' (2003) 9(10) *Violence against women* 1213.

As mentioned above, research suggests that the achievement of estimated benefits is not only feasible but likely. The breakeven thresholds used in this analysis present the minimum levels of effectiveness required for the Code to equal its costs, however, available literature suggests that actual benefits may be higher. Research on different GBV interventions in education settings has demonstrated measurable impacts on both prevention and response, with some intervention effects exceeding the level required to break even by approximately threefold. For example, for the benefits associated with the prevention of GBV to be achieved, a reduction of approximately 1 per cent of GBV cases on campus is required. Some studies suggest that GBV interventions can reduce cases of sexual violence and bullying by approximately 3 per cent.[72]

Although no existing policy fully captures the depth and complexity of the Code and its objectives, international programs addressing specific impacts – such as the value of training and mental health improvements – offer relevant comparisons. These programs report BCRs ranging from 4 to 100, with an estimated 90 per cent likelihood (on average) that benefits will outweigh costs.[73] Within this context, a BCR of 3 for the Code is considered feasible, given that this reflects a conservative effort or the minimum level of benefits that may be achieved.

Summary of underlying assumptions

The modelling results are underpinned by several key assumptions that shape the estimated costs and benefits of the Code. These assumptions are informed by the Department's Expert Reference Group and align with best practice CBA guidelines, including the Australian Government Guide to Policy Impact Analysis. These assumptions relate to:

- **compliance**: partial and growing compliance over time across the 211 HEPs, as well as affiliated student accommodation
- **variation based on provider size:** unit cost estimates and compliance rates scale according to the size of each HEP, reflecting variation in the volume of activity, risk profile, and availability of financial and labour resources
- **existing effort undertake by HEPs to manage GBV under the base case:** attribution factors reduce costs based on stakeholder insights that some HEPs may already have relevant infrastructure and resources in place that align with, or contribute to, compliance with multiple standards of the Code (this includes existing governance frameworks, IT systems, training platforms, and education technology specialists)
- **data limitations:** where robust data is not available, such as the prevalence of GBV, the model draws on sector-wide averages for key variables
- **quantification of direct impacts only**: estimated benefits incorporate only direct and quantifiable impacts for female students and staff – indirect and unquantified effects such as reduced pressure on support services, benefits to broader cohorts, and long-term cultural change are excluded from the analysis, so the estimated benefits are likely to be conservative in this regard.

Taken together, these assumptions have been designed to provide a credible estimate of regulatory impact. In areas of uncertainty, conservative assumptions have been applied. This is particularly the case in relation to benefit estimation and the estimation of existing provider capabilities. This means the analysis is more likely to understate rather than overstate the potential net benefits of implementation. While this approach strengthens the reliability of results, it also means that the full social and economic value of the reforms may be higher than reported. Equally, if key assumptions (such as compliance or effectiveness) are not realised in practice, actual costs may be higher. These limitations should be considered when interpreting the results and their implications for implementation.

Implementation considerations

The realisation of net benefits will depend upon the effective implementation of the Code. Stakeholder consultations have highlighted the need for adequate support, as well as clear definitions, requirements, and timeframes. Stakeholders expressed uncertainty about the definition and scope of certain terms in the Code and their practical implications. Key examples of this include:

- Some stakeholders expressed uncertainty about the full extent of what constitutes GBV. While all stakeholders recognised that sexual assault and harassment are included, there was some ambiguity around what other forms of violence fall under this category.
- The scope of the term staff in the Code and specifically whether this includes temporary, third-party, or contracted employees, particularly regarding GBV education and training requirements. Differentiation between requirements for

[72] Cahill, H., et al., *A social network analysis and implementation study of an intervention designed to advance social and emotional learning and respectful relationships in secondary schools*. Australia's National Research Organisation for Women's Safety (ANROWS, 2023) 95.
[73] Graham, J, et al., 'Co-Benefits, Countervailing Risks, and Cost-Benefit Analysis' (2024) 2 *Human and Ecological Risk assessment: Theory and Practice 1167.*

different staff has practical implications on costs, for example, where back-of-office staff are required to obtain Working with Children Checks regardless of whether they will be interacting with students directly.
- Additionally, some stakeholders felt there was a need for further clarity about what a whole-of-organisation approach meant and what practical actions providers would be required to take to comply.

Other stakeholders noted that the effectiveness of the Code will depend on the interrelated nature of the standards and how they work together in practice. For example, some HEPs noted that the intended use of deidentified data remains unclear, particularly how it will be used to inform other improvements in support services and campus safety initiatives. This underscores the complexity of implementation, as the overall strength of the Code is contingent on the effective execution of each of its standards.

These elements will be critical in ensuring effort by stakeholders (and associated costs) is not disproportionate to what is required to comply with the Code and to ensure that evidence-based practices are adopted with the best chance of realising the potential benefits. To this degree, ongoing engagement with HEPs while implementing the Code will be essential to its success.

1 Introduction and background

1.1 Introduction

Gender-based violence (GBV) refers to any form of physical or non-physical violence, or harassment, abuse or threats based on gender that results in, or is likely to result in, harm, coercion, control, fear or deprivation of liberty and autonomy.[74] Although people of all genders can experience GBV, prevalence studies indicate that most victim-survivors of this type of violence are women, while most perpetrators are men.[75]

Recent reports and inquiries into the higher education sector have highlighted high rates of GBV affecting both students and staff (see section 1.2.2). Higher education providers (HEPs) have existing obligations to ensure safe learning and working environments. While some HEPs demonstrate good practice and a strong commitment to prevention and response, this is not consistent across the sector, with some HEPs falling short of meeting current government and community expectations, given the high reported prevalence in the sector.[76]

In 2017, the Australian Human Rights Commission issued nine recommendations for HEPs, focusing on structural and cultural reforms to improve responses to sexual assault and harassment.[77] The Tertiary Education Quality and Standards Agency (TEQSA) later conducted an audit of the higher education sector's responses to these recommendations, which found that while many universities had adopted systems or policies which aligned with best practice, others, including independent and TAFE HEPs, had less comprehensive approaches to addressing the issue of GBV.[78] Reports have also consistently identified student accommodation settings as an area in need of further action.[79,80]

In July 2023, the Australian Universities Accord Interim Report highlighted the need to improve student and staff safety in university communities.[81] In response, Education Ministers released the *Action Plan Addressing Gender-Based Violence in Higher Education*, with seven actions to address GBV across the sector (the Action Plan).[82] Action three of the Action Plan introduces the National Higher Education Code to Prevent and Respond to Gender-based Violence (the Code). The specific requirements of the Code and its standards are outlined in Chapter 2.

The Department has engaged Deloitte to analyse the potential impacts of implementing the Code, in terms of costs and benefits. The Code proposes seven standards that HEPs must comply with. These standards contain measures which aim to standardise evidence-based practice across the sector, including in relation to student accommodations directly owned, operated, managed, and/or otherwise affiliated with a HEP. It is intended that the Code will be implemented and made legally enforceable under the proposed Universities Accord *(National Higher Education Code to Prevent and Respond to Gender-based Violence) Bill 2025* (Cth) (the Bill).

This cost-benefit analysis (CBA) report assesses the impacts of the proposed Code on students, staff (including full-time, part-time time and casual employees as well as volunteers), HEPs, and the Australian Government. This includes both costs

[74] Australian Government Department of Education, *Proposed National Higher Education Code to Prevent and Respond to Gender-based Violence 2025* (2025) <https://www.education.gov.au/action-plan-addressing-genderbased-violence-higher-education/resources/proposed-national-higher-education-code-prevent-and-respond-genderbased-violence-2025>
[75] Australian Government Department of Education, *National Higher Education Code to Prevent and Respond to Gender-based Violence: Issues Paper Appendix B* (2024) <https://www.education.gov.au/action-plan-addressing-genderbased-violence-higher-education/resources/national-higher-education-code-prevent-and-respond-genderbased-violence-issues-paper>
[76] Ibid.
[77] Australian Human Rights Commission, 'Change The Course: National Report on Sexual Assault and Harassment at Australian Universities', *Australian Human Rights Commission* (2017) <https://humanrights.gov.au/our-work/sex-discrimination/publications/change-course-national-report-sexual-assault-and>
[78] 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 harassment* (2019) <https://www.teqsa.gov.au/sites/default/files/sash-report-march-2019.pdf>
[79] Australian Human Rights Commission, 'Change The Course: National Report on Sexual Assault and Harassment at Australian Universities', *Australian Human Rights Commission* (2017) <https://humanrights.gov.au/our-work/sex-discrimination/publications/change-course-national-report-sexual-assault-and>
[80] Social Research Centre (SRC), 'National Student Safety Survey', *National Student Survey* (2022) <https://www.nsss.edu.au/results>
[81] Australian Government Department of Education, *Australian Universities Accord Interim Report* (2024) <https://www.education.gov.au/australian-universities-accord>
[82] Australian Government Department of Education, *Action Plan Addressing Gender-based Violence in Higher Education* (2024) <https://www.education.gov.au/action-plan-addressing-genderbased-violence-higher-education>

and benefits associated with compliance with, and administration of, the standards outlined in the Code, including any changes in regulatory burden and unintended consequences.

1.2 Background on GBV in Australia

1.2.1 The issue of GBV in Australia

GBV is a prevalent and significant problem in Australia. The 2021 Personal Safety Survey, conducted by the Australian Bureau of Statistics, revealed that one in three women have experienced physical violence and one in five women have experienced sexual violence during their lifetime.[83] To address this, all Australian governments share a commitment to ending GBV within one generation through the *National Plan to End Violence against Women and Children 2022–2032* (the National Plan). To achieve this vision, the National Plan sets out a ten-year blueprint of work to be undertaken by all levels of government as well as by communities and industries across the country.[84]

The National Plan builds on previous efforts (notably the *National Plan to Reduce Violence Against Women and Their Children 2010–2022*)[85] and adopts an expanded scope that considers a broader understanding of GBV. This includes an aim to increase efforts to prevent, improve responses to, and reduce the societal stigma around sexual violence, to recognise children as individuals who experience violence in their own right, and to address violence against LGBTIQA+ individuals.[86]

The National Plan adopts a holistic and multi-sectoral approach to ending violence against women and children, and considers four priority areas for action:

- prevention: stopping violence before it starts
- early intervention: stopping violence from escalating and protecting victim-survivors from both immediate and long-term harm
- response: holding perpetrators to account, helping to keep women and children safe, and reducing the recurrence of violence
- recovery and healing: supporting victim-survivors to recover and heal from trauma and the physical, mental, emotional, and economic impacts of violence.[87]

1.2.2 GBV in higher education

GBV is notably prevalent in the higher education sector. Evidence from the 2021 National Student Safety Survey (NSSS) reveals that since starting university, one in six Australian university students have been sexually harassed and one in 20 have been sexually assaulted.[88] Female students were significantly more likely than male students to have had experiences of both sexual harassment and assault, with prevalence rates 37 per cent and 28 per cent higher, respectively. Students who identify as transgender, non-binary, or as another gender also reported high lifetime prevalence rates of both sexual harassment and assault, facing similar or higher prevalence rates than women. Students living in student accommodation are at greater risk. The 2021 NSSS found that students who lived in student accommodations or residences were more likely to have experienced sexual harassment in the past 12 months, with 24 per cent having experienced sexual harassment since starting university.[89]

University staff are also at risk. In 2023, the National Tertiary Education Union (NTEU) released the *Sexual harassment in the Workplace* report, which surveyed union members' experiences with sexual harassment, sexism, and gender-based bias in the tertiary education workplace between 22 August and 1 September 2023.[90] This report revealed that nearly a third (29 per cent) of university staff had a personal experience of sexual harassment, while half (50 per cent) were aware of others who have been sexually harassed.

To address this prevalence, in February 2024, Education and Higher Education Ministers released the *Action Plan Addressing Gender-based Violence in Higher Education* (the Action Plan).[91] The Action Plan acknowledges the significant rate of sexual

[83] Australian Bureau of Statistics, *Personal Safety, Australia* (2023) <https://www.abs.gov.au/statistics/people/crime-and-justice/personal-safety-australia/latest-release>
[84] Australian Government Department of Social Service, *The National Plan to End Violence against Women and Children 2022-2032* (2022) <https://www.dss.gov.au/system/files/resources/national-plan-end-violence-against-women-and-children-2022-2032.pdf>
[85] Ibid.
[86] Ibid.
[87] Ibid.
[88] Social Research Centre (SRC), 'National Student Safety Survey', *National Student Survey* (2022) <https://www.nsss.edu.au/results>
[89] Ibid.
[90] National Tertiary Education Union, 'New survey reveals shocking rise in sexual harassment at universities', *National Tertiary Education Unit* (2023) <https://www.nteu.au/News_Articles/Media_Releases/Sexual_Harassment_Survey_Report.aspx>
[91] Australian Government Department of Education, *Action Plan Addressing Gender-based Violence in Higher Education* (2024) <https://www.education.gov.au/action-plan-addressing-genderbased-violence-higher-education>

violence that continues to occur in university communities, and its detrimental effects on victim-survivors' mental and physical health and wellbeing, as well as their educational outcomes. It recognises that students and staff victim-survivors have not consistently received the support and care they need and deserve from HEPs. Additionally, perpetrators have not adequately been held to account, and some HEPs have not always been transparent.

The Action Plan outlines a multi-pronged approach with several key actions, including the establishment of the Code:

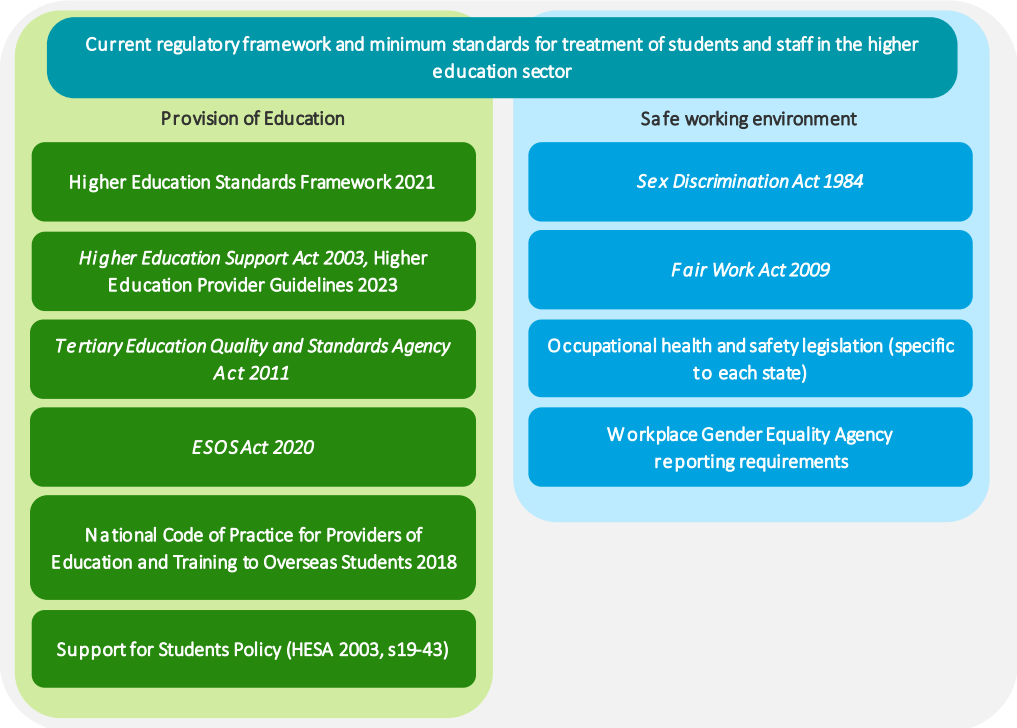
- **Action 1 - Establishment of a National Student Ombudsman**: This role will serve as a primary escalated complaints mechanism for students
- **Action 2 - Whole-of-Organisation Approach**: HEPs are required to embed comprehensive strategies to prevent and respond to GBV
- **Action 3 - Introduction of a National Higher Education Code**: This Code will set clear requirements for institutions regarding their responsibilities in addressing GBV
- **Action 4 - Enhanced Accountability**: Strengthening oversight of standalone SAPs and ensuring compliance with legal obligations related to safety
- **Action 5 - Legislative and Policy Prioritisation**: Ensuring that laws and regulations prioritise the safety of victim-survivors
- **Action 6 - Data Transparency**: Increasing scrutiny of data related to incidents of GBV in higher education settings
- **Action 7 - Ongoing Review**: Regular assessment of progress against the Action Plan's objectives.[92]

This CBA estimates the potential costs, benefits, and changes in regulatory burden associated with the implementation of Action 3 – the introduction of the Code.[93]

1.2.3 The current regulatory environment

All HEPs have existing legislated obligations to provide safe learning and work environments (see Figure 1.1). However, the lack of a clear sector-wide approach to addressing GBV has led to varying responses across institutions, leaving both students and staff vulnerable to harm. The Code aims to address the gap in existing regulatory frameworks, improving the safety of students and staff as well as the transparency and accountability of practices in higher education.

Figure 1.1 Other relevant legislation, policies, regulations, and guidelines that make requirements or obligations for higher education providers to ensure the safety of students and staff.



Source: Deloitte Access Economics, 2025.

[92] Ibid.
[93] The introduction of the Code (Action 3) will also help further Actions 2, 4, 5, and 6.

1.2.3.2 Legislative requirements for the provision of education

The *Tertiary Education Quality and Standards Agency Act 2011* (TEQSA Act) requires that all Australian HEPs be registered by TEQSA. To be registered by TEQSA, HEPs must comply and continue to comply with the Higher Education Standards Framework (Threshold Standards) 2021, which sets out minimum acceptable requirements for the provision of higher education in or from Australia. TEQSA monitors ongoing compliance with the Threshold Standards.

The Threshold Standards provide standards around student wellbeing under Domain 2.3 Wellbeing and Safety, and require the provision of information about available actions to enhance safety and security, timely and accurate advice, support services, and a critical incident policy. However, there is limited detail provided on the scope of safety issues and incidents these requirements relate to, and subsequently, what issues HEPs must be prepared to respond to. While Domain 2.4 requires student grievance mechanisms, policies, and complaint-handling processes to be in place, there is limited detail on what specific requirements and adjustments must be available to support student safety and wellbeing.

It is widely recognised that GBV requires targeted responses and investigations, tailored support services, and trained first-responders to reduce the risk of re-traumatisation of alleged victim-survivors and to break the cycle of violence.[94] In order to provide this level of support, responses must go beyond minimum requirements for safety and wellbeing and be backed by dedicated governance arrangements and clear accountable leadership. As a result, the scope of the Threshold Standards does not presently require or provide support for HEPs to take the level of dedicated action required to achieve effective and consistent GBV responses and interventions across the sector. Although some HEPs have demonstrated leadership in this space, introducing GBV policies and procedures that exceed these minimum requirements, this is not consistent across the sector, and there is limited oversight of their effectiveness and alignment with best practice.[95]

HEPs are also required to demonstrate that they have taken reasonable steps to ensure that appropriate safety measures and support services, including to respond to GBV, are in place for overseas students to meet the Education Services for Overseas Students National Code 2018 (ESOS National Code) and the *Support for Students Policy in the Higher Education Support Act 2003* (HESA). However, these requirements also do not create explicit requirements in relation to protecting students from GBV and therefore do not constitute the comprehensive and targeted approach that the National Plan indicates is needed to drive effective, system-wide change.[96]

1.2.3.3 Legislative requirements for the provision of a safe working environment

Legislative tools also create requirements for employers to ensure they foster a safe working environment for employees. For example, workplace health and safety laws, both at a national and state and territory level, create a positive duty for HEPs to provide a safe working environment for staff, and the *Sex Discrimination Act 1984* requires employers to take 'reasonable and proportionate measures' to eliminate and prevent sexual discrimination and harassment.[97] However, none of these legislative and regulatory requirements constitute a comprehensive and targeted approach to preventing and responding to GBV in all its forms, which the National Plan asserts as required to drive effective responses and lasting change. Furthermore, these tools do not require that HEPs provide the Government with clear visibility of their performance.[98]

In recent years, some HEPs have dedicated concerted efforts to move beyond these minimum requirements and have taken proactive steps to address GBV and specifically sexual violence. A 2024 report by the Australian Human Rights Institute indicates that nearly all Australian universities now have stand-alone policies on sexual violence and clear guidance on how students or staff who have been subjected to sexual violence can access internal and external support services.[99] The report found that most of these stand-alone policies are identifiable to students and staff due to clear and appropriate naming, although it is noted that the term/s used to describe sexual violence are inconsistent between different institutions (e.g., some use 'sexual harm' or 'sexual misconduct' instead).

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[94] Australian Government Department of Social Service, *The National Plan to End Violence against Women and Children 2022-2032* (2022) <https://www.dss.gov.au/system/files/resources/national-plan-end-violence-against-women-and-children-2022-2032.pdf>
[95] Australian Human Rights Institute, 'How does your university respond to campus sexual violence?', *UNSW Sydney* (2024) <https://www.humanrights.unsw.edu.au/sites/default/files/documents/How%20Australian%20Universities%20are%20Responding%20to%20Campus%20Sexual%20Violence%20-%20February%202024.pdf>
[96] Australian Government Department of Social Service, *The National Plan to End Violence against Women and Children 2022-2032* (2022) <https://www.dss.gov.au/system/files/resources/national-plan-end-violence-against-women-and-children-2022-2032.pdf>
[97] *Sex Discrimination Act*, Commonwealth of Australia (1984).
[98] Australian Government Department of Social Service, *The National Plan to End Violence against Women and Children 2022-2032* (2022) <https://www.dss.gov.au/system/files/resources/national-plan-end-violence-against-women-and-children-2022-2032.pdf>
[99] Australian Human Rights Institute, 'How does your university respond to campus sexual violence?', *UNSW Sydney* (2024) <https://www.humanrights.unsw.edu.au/sites/default/files/documents/How%20Australian%20Universities%20are%20Responding%20to%20Campus%20Sexual%20Violence%20-%20February%202024.pdf>

However, the Australian Human Rights Institute report indicates that only 15 universities have current action plans or strategies targeting sexual violence or GBV, and a third do not have standing governance mechanisms in place, such as internal taskforces or advisory committees, to ensure a consistent ongoing focus on sexual violence.[100] Furthermore, there is no systematic oversight of the effectiveness of these policies and procedures, and most HEPs do not publicly report information or data on the number of disclosures they receive or their responses. Specifically, the report found that only 15 of Australia's universities publish consolidated information about the disclosures or reports of sexual violence they receive, and only three of the universities that participated in the NSSS have made their detailed reports publicly available on their websites.

1.2.4 Australia's GBV obligations under international standards

Australia has a number of obligations it must comply with under international standards in relation to GBV, specifically the following:

- **Convention on the Elimination of All Forms of Discrimination against Women:** As a State Party to CEDAW, Australia is committed to being a society that eliminates discrimination (including any form of violence and sexual harassment) against women and promotes gender equality through policies, laws, organisations, structures, and attitudes.[101]
- **Declaration of Violence Against Women:** As a signatory, Australia is obliged to condemn violence against women, develop policies and laws to eliminate it, and provide specialised assistance to victims.[102]
- **Convention on the Rights of Persons with Disabilities:** The convention obligates Australia to promote, protect, and ensure the full and equal enjoyment of all human rights for all persons with disabilities, as such Australia has committed to addressing the disproportionate impacts of discrimination and all forms of gender-based violence experienced by women with disabilities.[103]

1.3 Purpose and scope of this document

This cost-benefit analysis (CBA) report estimates the potential costs, benefits, and changes in regulatory burden associated with the proposed introduction of the Code. This report has been prepared for integration in, or attachment to, the Commonwealth Department of Education's Impact Analysis of the Code.

Inputs for the analysis in this report are informed by publicly available information and data provided by the Department of Education. This report considers the costs, benefits, and changes in regulatory burden associated with the standards that are to be established through the Code. Broadly, the Code aims to systematically improve the safety of students and staff (including full-time, part time and casual employees as well as volunteers) in higher education by establishing comprehensive regulatory requirements and oversight mechanisms that require HEPs to adopt consistent, evidence-based approaches to preventing and responding to GBV.

Quantifying the costs and benefits of the Code presents uncertainty, which makes it difficult to precisely predict the total economy-wide impacts. The uncertainty primarily stems from the complexity of the issue GBV presents and the difficulty in ascertaining how much of the anticipated benefits are directly attributable to the Code. This is complicated by external factors, including the existing GBV policies and procedures HEPs implemented prior to the Code, and the differences in their scope, scale, and effectiveness across different institutions. This CBA therefore provides a conservative estimate of identified, quantifiable benefits of the Code, while applying an attribution rate that acknowledges the existence of outside factors.

[100] The report also found that higher education providers do not consistently have online reporting mechanisms, and there are general issues to do with a lack of clarity in reporting procedures about the difference between concerns, disclosures, reports and complaints and a lack of consistency across universities in the use of these terms.
[101] Australian Human Rights Commission, 'The Convention on the Elimination of All Forms of Discrimination against Women (CEDAW): Sex Discrimination- Intentional Activities', *Australian Human Rights Commission* (1981) <https://humanrights.gov.au/our-work/sex-discrimination/convention-elimination-all-forms-discrimination-against-women-cedaw-sex>
[102] United Nations Office of the High Commission, 'Declaration on the Elimination Violence against Women' *United Nations* (1993) <https://www.ohchr.org/en/instruments-mechanisms/instruments/declaration-elimination-violence-against-women>
[103] Australian Government, 'Australia's international human rights obligations and development commitments', *Working For Women A Strategy for Gender Equality* (2024) <https://genderequality.gov.au/working-for-women/more-information-and-accessing-support/appendix-1-australias-international-human>

2 Summary and intervention logic of requirements under the Code

This chapter summarises the base case and the requirements under the Code to be assessed by the impact analysis, including their intervention logic.

2.1 The base case

The base case in a CBA serves as a reference point against which the impacts of a proposed intervention are measured. This reflects what would happen in the absence of the policy change. In this CBA, the base case represents the status quo under which the Code is not introduced. Under the current regulatory environment, HEPs have existing obligations to students and staff under legislation on the provision of education and workplace health and safety. However, these frameworks lack specific sector-wide standards for preventing and responding to GBV and do not require HEPs to measure or track the effectiveness of their current policies and procedures (see section 1.2.3).

As a result, under the base case, approaches are inconsistent across institutions. Some HEPs have taken proactive steps to address GBV even prior to the announcement of the Code. For example, consultations revealed that some HEPs started implementing GBV policies and protocols as early as 2019, having installed sophisticated IT systems capable of collecting and aggregating the required data, as well as implementing comprehensive case management protocols that enable rapid responses and resolutions to disclosures or formal reports of GBV. Therefore, under the base case, some institutions believe they are already demonstrating best practice.

However, there are disparities across the sector in the level and sophistication of GBV initiatives, with many still lacking comprehensive action plans, governance structures, and transparent reporting mechanisms.[104] Without the introduction of the Code, these inconsistencies and gaps would likely persist.

Beyond the quality of current GBV policies and processes within HEPs, the NSSS revealed that there is significant underreporting to HEPs among student victim-survivors of sexual harassment and violence. The NSSS indicates that only three per cent of students who had experienced sexual harassment and just under six per cent of students who had experienced sexual assault had made a formal complaint or report about their most impactful incident to their university.[105] The most common reported reasons that students did not make a formal complaint or report to their university included thinking they did not need help, that others would not think it was serious enough, and that it would be too hard to prove.

Students who did report their experience to their university had mixed experiences in terms of the information provided to them and their overall satisfaction with the process.[106] Of those who reported sexual harassment, almost three in five (56.1 per cent) said their university had explained the reporting or complaints process to them, and two in five (41.3 per cent) were satisfied with the process. Students with experiences of sexual violence were less satisfied, with one in two (47.5 per cent) saying their university had explained the reporting or complaints process to them, while fewer than one in three (29.7 per cent) were satisfied with the process.

Additionally, many students indicated little to no awareness of the available avenues to address sexual harassment or assault in their university. One in two students indicated that they knew very little or nothing about their university's formal report or complaint process for sexual harassment (51.0 per cent) or sexual assault (53.6 per cent). Almost half of those surveyed also said they knew nothing or very little about where they could seek support or assistance within the university for sexual harassment (46.7 per cent) or sexual assault (43.5 per cent).

[104] The report also found that higher education providers do not consistently have online reporting mechanisms, and there are general issues to do with a lack of clarity in reporting procedures about the difference between concerns, disclosures, reports and complaints and a lack of consistency across universities in the use of these terms.
[105] Social Research Centre (SRC), 'National Student Safety Survey', *National Student Survey* (2022) <https://www.nsss.edu.au/results>
[106] Ibid.

For staff affected by GBV, the NTEU's *Sexual harassment in the Workplace* report (2023) found that almost half of HEP staff who experienced sexual harassment in the workplace did not make any complaint to the HEP.[107] Of those victim-survivors who did, about a quarter (24 per cent) made an informal complaint and 13 per cent made a formal complaint. For staff the most common reported reasons for not reporting were that they didn't think anything would be done (59 per cent), they didn't trust the complaint process (51 per cent), they thought people might think they were overreacting (51 per cent), and/or they feared it might hurt their career (46 per cent).

Staff who did make formal complaints reported largely negative experiences with their institution's complaints process. About half (48 per cent) said that no action was taken in response to their complaint, and just over half (52 per cent) said they were encouraged to drop the issue. Furthermore, 44 per cent of staff who reported their experience of sexual harassment indicated that they experienced repercussions from their employer, including denial of promotion, transfer, reassignment to less favourable work, and/or scheduling changes.

Consequently, without targeted intervention such as the Code, underreporting is likely to persist, while many victim-survivors who do come forward to their universities may continue to have unsatisfactory help-seeking experiences. Such experiences not only risk enabling the ongoing incidence of GBV, but also retraumatise victim-survivors who do choose to come forward.

Furthermore, as outlined in the National Plan, effectively end violence against women in one generation will require a whole-of-society approach to intervention. This includes support from businesses, such as HEPs, with evidence suggesting that structural change requires a whole-of-organisation approach that works holistically across every level of an organisation, across policies and processes, and with staff.[108]

2.2 Requirements under the proposed National Code

The Code is proposed to be introduced as an instrument under subsection 15(1) of the Bill. The purpose of the Code, as described in Section 16(1) of the Bill, is to provide national standards for HEPs in connection with preventing and responding to GBV, so that:

- study, work, social, and living environments are safe, respectful, and inclusive for staff and students
- HEPs work to prevent, reduce, and eliminate GBV to the greatest extent possible
- HEPs effectively respond to GBV in a way that prioritises and protects safety, health, and wellbeing
- HEPs address the factors that drive and contribute to GBV
- HEPs have effective governance arrangements in place to prevent and respond to GBV across all of their operations and at all levels of their organisations.

The Code builds on the National Plan and Actions 3 and 4 of the Action Plan, by setting clear requirements for HEPs to address GBV and strengthening their performance beyond minimum requirements. Specifically, the proposed measures for assessment as part of the scope of this work include:

a) national standards and related requirements for HEPs to prevent and respond to GBV in their communities, which are to be embodied in the Code; and
b) a regulatory framework to monitor and enforce compliance with the national standards and related requirements.

Specifically, the Code will set seven standards for preventing and responding to GBV. A summary of the seven proposed standards, subject to the passage of legislation, is set out below.

2.2.1 Standard 1: Accountable leadership and governance

Standard 1 aims to enhance accountable leadership and governance by requiring HEPs to take a whole-of-organisation approach to safety and support in preventing and responding to GBV.

The central requirement of Standard 1 is to prepare, implement, and publish a whole-of-organisation GBV Prevention and Response Plan. HEPs must also develop and implement a complementary outcomes framework to track and measure the effectiveness of actions under their Prevention and Response Plan (PRP). It is required within the Standard that the Plan be developed through engagement and collaboration with students and staff, including those who have experienced GBV. The PRP and outcomes framework must be finalised and provided to the Secretary of the Department of Education (the

[107] National Tertiary Education Union, 'New survey reveals shocking rise in sexual harassment at universities', *National Tertiary Education Unit* (2023) <https://www.nteu.au/News_Articles/Media_Releases/Sexual_Harassment_Survey_Report.aspx>
[108] Australian Government Department of Social Service, *The National Plan to End Violence against Women and Children 2022-2032* (2022) <https://www.dss.gov.au/system/files/resources/national-plan-end-violence-against-women-and-children-2022-2032.pdf>

Secretary) by the initial reporting date. If the Secretary provides feedback, HEPs will be required to implement the necessary changes and submit a revised version within a specified timeframe. The Secretary may also require a HEP to report on how it has complied with its obligations under this standard in a manner and form to be prescribed by the Secretary.

Beyond this, the Standard also contains regular reporting requirements which indicate that HEPs must every six months report to their internal governing body on their performance against the outcomes framework, every two years deliver a report to the Secretary on their performance against the Prevention and Response Plan and its outcomes framework, and every four years perform a systemic review informed by the HEP's analysis of data that is reported on to the Secretary.

Otherwise, Standard 1 obligates the HEP's Higher Education Principal Executive Officer to be the individual person responsible for their organisation's compliance with the Code. It also requires that HEPs have expertise in student and staff safety and wellbeing within its governing body or have a subcommittee that has delegated responsibility for student and staff safety and wellbeing that reports directly to the governing body.

Standard 1 will also require consultation with students and staff in the development of the whole-of-organisational plan. Literature suggests that incorporating the perspectives of victims into policies can provide valuable insights into existing responses to their experiences and enhance future measures to support them.[109]

2.2.2 Standard 2: Safe environments and systems

Standard 2 aims to strengthen systematic safety checks and policies addressing GBV within HEPs to develop a consistent approach to fostering a safe environment for students and staff that sets clear expectations and promotes greater accountability.

To foster a safer environment, Standard 2 requires all higher education providers to complete multiple mandatory safety checks for staff members and to develop and implement a policy on preventing and responding to GBV. The mandatory safety checks include that staff comply with the Working with Children Check requirements of their governing state or territory and checks to identify whether potential employees have previously been investigated for an allegation of GBV, for breaches of the Code of Conduct, or other relevant codes or rules. Where a declaration is made, HEPs will be required to assess and address any risks in determining the person's suitability for their position.

Standard 2 also requires that HEPs develop a comprehensive policy on preventing and responding to GBV that applies to all students, staff, and affiliated organisations. The policy must be person-centric and trauma-informed, meeting a variety of requirements outlined in the Standard, including to:

- adopt the definition of GBV as defined in the Code
- clearly state that GBV is unacceptable behaviour
- identify potential consequences for perpetrating GBV
- include information on the factors that drive and contribute to GBV, available support services, and procedures relating to disclosures and formal reporting
- be designed to support the prevention of GBV, effective responses, disclosers to achieve their educational outcomes, and the physical and psychological safety and wellbeing of students and staff.

This policy is required to be reviewed at least every three years. This review must be developed through engagement and collaboration with key stakeholders, including students, staff, those who have experienced GBV, population cohorts who are disproportionately affected by GBV, subject matter experts, and third parties whose facilities are used by students or staff to undertake clinical or other work.

Additionally, HEPs are required to prohibit the use of non-disclosure agreements (NDAs) in relation to GBV, unless requested by a discloser. If requested and agreed with the HEP, the NDA must:

- not stop the discloser from sharing their experience for the purpose of seeking support and advice
- prevent the HEP from complying with their reporting obligations under the Code
- nor contain a non-disparagement clause that could require the discloser to keep their experience of GBV confidential.

Under Standard 2, HEPs must implement any recommendations directed to them by the National Student Ombudsman in relation to GBV. Moreover, the Secretary may require providers to submit a compliance report detailing how they meet their obligations under this standard, in a manner and form prescribed by the Secretary.

[109] Walklate, S., Maher, J., McCulloch, J., Fitzgibbon, K., & Beavis, K. 'Victim stories and victim policy: Is there a case for a narrative victimology?'. (2018)

2.2.3 Standard 3: Knowledge and capability

Standard 3 requires HEPs to build internal knowledge and capability to safely and effectively prevent and respond to GBV. It will require that all students and staff undertake ongoing targeted education and training designed to improve awareness, understanding, and responses to GBV.

Standard 3 broadly requires HEPs to facilitate two types of education and training around GBV: prevention and disclosure. First, the Standard requires that all students and staff undertake ongoing, comprehensive prevention education and training, designed to prevent GBV by improving awareness and understanding around the topic. This training and education must be evidence-based and aligned to best-practice, including being trauma-informed, tailored to the HEP's community and context, culturally appropriate, inclusive, and accessible to participants with disabilities, and designed to safely manage any disclosures or formal reports that participants may make during the course. The Code requires that this prevention education and training must include learning outcomes that increase awareness and understanding of:

- what constitutes GBV
- the factors that drive and contribute to GBV
- how forms of inequality and discrimination compound to affect GBV, particularly for those who are disproportionately affected by GBV
- healthy, respectful, and safe relationships and consent
- support services, resources, and reporting channels available to a person who has experienced GBV
- how to be an ethical bystander and compassionate responses to disclosures and formal reports.

Prevention education and training are also required to build understanding of GBV by strengthening knowledge and capability over time. The course must be developed through collaboration and engagement with experts in GBV, students, staff, people with lived experience, and population cohorts who are disproportionately affected by GBV. To complement this training and education, HEPs must also promote and widely disseminate evidence-informed prevention communication and key messaging across their study, work, living, and social environments, and conduct prevention initiatives, including programs and campaigns.

The second stream of education and training required to be developed and delivered by HEPs is specialised education and training on responding to disclosures or formal reports of GBV. This training and education must be completed by all staff as well as students in leadership positions as part of their onboarding process and subsequently repeated on at least an annual basis. Disclosure education and training must teach participants how to:

- take a trauma-informed and person-centred approach when responding to disclosures
- increase participants' awareness of the effect of trauma, including on a person's behaviour, memory, and health and wellbeing
- take into account the needs of all members of the HEP's community, particularly those members who are disproportionately affected by GBV.

This education and training must either be developed with or approved by an accredited specialist and be designed to safely manage any disclosures or formal reports that may arise in the course of the education and training.

To ensure the quality of all the training and education provided, HEPs must undertake ongoing monitoring and evaluations, with regard to learning outcomes, feedback, and any other relevant factors. The findings from monitoring and evaluation must be used to inform future education and training, and the Secretary may require HEPs to provide copies of evaluation reports and/or to develop a report on how this has been done.

This standard also requires that all risk assessments conducted under the Code are undertaken by staff with expertise in GBV risk assessments and have demonstrated competency in working with population cohorts who are disproportionately affected by GBV. Where a HEP does not have staff with the necessary expertise and experience to conduct a risk assessment, it must engage an external person with the necessary expertise and experience to do so, except in urgent circumstances in which a HEP must take action consistently with its duty of care to students and staff.

Furthermore, under Standard 3, a HEP must require staff involved in responding to formal reports, investigating, or determining a disciplinary proceeding in relation to GBV to have knowledge, experience, and expertise on GBV. This must include knowledge of the types, patterns, effects, and risk and protective factors for experiencing GBV (including coercive control), as well as how GBV is experienced by different groups of people. Additionally, these staff members must have specific experience and expertise in:

- how to respond effectively to people who have experienced and engaged in GBV, including consistently with trauma-informed and person-centred approaches

- the effects of trauma, including on a person's behaviour, memory and health, and wellbeing
- competency in working with specific cohorts including First Nations people, culturally and linguistically diverse communities, people with disability, and people of diverse sexual orientation and gender identity
- procedural fairness
- taking and recording statements
- handling reports and disclosures.

The Code requires that HEPs ensure these staff members undertake training once every three years in areas relating to this GBV knowledge, experience, and expertise. Where a HEP identifies that it does not have staff with the necessary expertise and experience to carry out an investigation or determine a disciplinary proceeding, the HEP must engage an external person with the requisite expertise.

2.2.4 Standard 4: Safety and support

Standard 4 requires that HEPs provide students and staff access to high-quality response and support services that are safe and person-centred. This requirement aims to ensure that victim-survivors of GBV are supported to safely make disclosures or formal reports that do not retraumatise them, and that they receive effective supports that facilitate recovery and healing.

Standard 4 is centred on delivering safe and effective support for both disclosers and respondents. Under this standard, HEPs are required to engage and seriously consider the views of any person making a disclosure and/or formal report of GBV, and in response implement safety measures. Risk assessments must be undertaken in response to all disclosures and formal reports of GBV and any identified risks must be managed and monitored on an ongoing basis.

For disclosers and respondents, HEPs must assign staff with relevant expertise and experience to develop tailored support plans. These support plans must:

- implement any measures necessary to ensure the safety of the discloser
- explain and prioritise access to support services and accredited specialists for when needed and/or requested
- prioritise access to translation and interpreter services when needed and/or requested
- ensure, to the extent possible, that the discloser is not required to repeat the content of disclosures and formal reports multiple times to multiple people
- consider implementing academic and/or work adjustments
- undertake ongoing risk assessments to manage and monitor any identified risks
- where necessary, discuss the investigation and disciplinary processes.

The discloser and respective respondent are prohibited from being assigned the same support staff member/s.

HEPs are required to monitor their support services and evaluate the effectiveness of those services at least once every three years. The Code holds HEPs responsible for determining whether their support services require a change regarding their duty of care to students and staff.

More broadly, HEPs must actively promote and make widely available information about how students and staff can access policies and procedures, as well as internal and/or external support services including supports for academic adjustments. HEPs must also ensure that all responses, practices, and support services are safe, person-centred, and consistent with a trauma-informed approach and best practice.

2.2.5 Standard 5: Safe processes

Standard 5 aims to ensure that all formal reports of GBV are investigated and that a conclusion is reached within 45 business days, including finalisation of a disciplinary process. To achieve this outcome, the Standard makes several requirements around the availability, accessibility, and transparency of effective reporting and investigation processes.

Standard 5 creates several requirements to standardise reporting and investigation procedures across all HEPs. In regard to reporting, the Standard requires HEPs to clearly explain the processes for students, staff, and third parties to make a disclosure or formal report. HEPs must offer multiple channels for disclosures or formal reporting, such as in-person, online, and over the phone, and that there must be options to report anonymously. In response to anonymous reports, HEPs are required to take reasonable and proportionate actions, including identifying trends and risks to guide future actions aimed at preventing GBV.

Additionally, the Standard requires that HEPs have multiple pathways for disclosures and formal reports to be managed, to ensure a proportionate and safe response. The pathway taken must have regard to the wishes of the discloser. This includes considering resolutions that do and do not progress with an investigation, and the decision to or not to progress to a

disciplinary process. Safety measures must be taken regardless of whether an investigation occurs. Where a disciplinary process is not taken, safety measures must be considered, and a resolution implemented with the agreement of the discloser and respondent. However, all formal reports, where the respondent is a student or staff member of the HEP, must be investigated regardless of the context in which the GBV occurs.

Where an investigation does occur, the HEP must seek and consider the views of the discloser before progressing. HEPs must notify the discloser and respondent on the same day in writing if an investigation will be commenced, however, the discloser must be notified first. All parties, including the discloser and respondent, must be given the opportunity to be accompanied by a support person when asked about the matters that are the subject of the disclosure or formal report. HEPs cannot require the discloser or respondent to provide physical evidence relating to an alleged incident of GBV. With regard to appeals, HEPs must meet the following requirements:

- if a HEP gives notice of the outcome of the disciplinary process to a discloser, the HEP must also give written notice to the discloser within two business days of an appeal being lodged of the respondent appealing a disciplinary decision and/or information on potential outcomes of the appeal
- ensure their procedures are designed to allow appeals to be finalised within 20 business days
- only permit extensions of time to finalise appeals where required in the particular context where the Higher Education Principal Executive Officer has satisfied themselves that the extension is required
- unless a discloser requests otherwise, a HEP must give written notice to the discloser of the outcome, including the decision and any sanctions, reasons for the outcome, and rights to make an internal and/or external complaint, including to the National Student Ombudsman
- unless a discloser requests otherwise, a HEP must notify the discloser on the same day but before the respondent being notified of the outcome of the appeal.

2.2.6 Standard 6: Data, evidence and impact

Under Standard 6, HEPs will be required to collect and maintain fit-for-purpose data about GBV experienced by their students and staff. These requirements recognise that strengthened data collection systems and expanding the evidence base are essential components of a comprehensive response to GBV, and this required data collection will create a national dataset that can be used to monitor HEPs' performance and add to the national evidence base.

For the purpose of compliance, feedback, and collating data for the national evidence base, Standard 6 requires that all HEPs submit de-identified, aggregated data on an annual basis to the Commonwealth Department of Education. This data must include collection and reporting on the types of GBV experienced by students and staff, administrative de-identified demographic data, and enrolment/employment characteristics of disclosers and respondents where possible. The following demographic data must be collected by HEPs on all disclosers and respondents:

- sex
- gender identity
- sexual orientation
- year of birth
- race/ethnicity
- religion
- country of birth of person
- language/s used at home
- requirement for an interpreter
- Indigenous status
- disability status.

HEPs must also submit process data on the implementation of policies, procedures, plans, and related activities. Process data includes information and breakdowns of those engaged during stakeholder engagement in Standards 1 and 2, student and staff awareness of GBV policies and procedures, the number of recruitment processes that involved a declaration of an allegation, and more. With respect to Standard 3, the Secretary may require that providers provide data on the number and proportion of students, leadership, and staff who undertook GBV-related training and education, as well as the proportion of those who reported an increase in awareness and understanding of GBV, prevention learning outcomes, and ethical bystander behaviours following the training.

This data must be used to inform evaluations and to strengthen the HEP's whole-of-organisation approach to preventing and responding to GBV, including the Prevention and Response Plan and outcomes framework.

By 30 June each year, HEPs must provide the Secretary with data on four domains: disclosures, responses to disclosures, outcomes of investigations, and demographics of disclosers and respondents. This data aims to create a national picture of student and staff experiences, enabling HEPs to target their efforts and the government to build an evidence base to inform policy and responses from individual HEPs and at the national level.

2.2.7 Standard 7: Safe student accommodation

Standard 7 targets student accommodations. It aims to promote the safety of student residents by creating requirements that strengthen the accountability of SAPs for creating a safe and respectful environment and to improve the transparency around how this is achieved.

All student accommodations owned, operated, managed, or under the control of HEPs will, under Standard 7, be required to meet a range of targeted GBV prevention and response requirements. A key component of this standard is to increase accountability within leadership and governance arrangements. Similar to Standard 1, HEPs/SAPs must require that all their student accommodations prepare, implement, and publish a whole-of-organisation prevention and response plan that includes:

- an outline of the SAP's whole-of-organisation approach to preventing and responding to GBV that prioritises the safety and support of residents and student accommodation staff
- addresses the factors that drive and contribute to GBV, as well as any factors relevant to the SAP's context
- a whole-of-organisation assessment that identifies systemic risks, enablers and barriers to preventing GBV and outlines actions that will be taken in response to findings of the assessment
- reflects the needs, experience, and agency of all members of the SAP's community, particularly those members who are disproportionately affected by GBV.

Prevention and response plans must be developed, including in their design and implementation, through engagement and collaboration with residents and student accommodation staff, and those who have experienced GBV. The impact of the prevention and response plan must also be monitored and measured on an ongoing basis and updated every four years.

Standard 7 also mandates that HEPs/SAPs ensure that the staff of their SAPs complete the following safety checks:

- declare whether they have been investigated for an allegation of, or determined to have engaged in conduct that constitutes GBV in similar positions, or during any employment or engagement as a contractor
- declare any existing or previous intimate personal relationship with a resident of the student accommodation
- undertake prevention and responding to disclosures education and training, which is delivered or approved by the HEP/SAP, meets the requirements in Standard 3, and is tailored to the student accommodation environment
- meet all other relevant requirements set out in the Code, including but not limited to undertaking risk assessments by expert personnel and meeting data collection and reporting requirements.

In response to disclosures or formal reports of GBV, SAPs will be required to have specific arrangements in place to support affected residents and staff. These arrangements must include to:

- provide or facilitate access to support services to disclosers and respondents, including explaining the available support services and any relevant educational outcomes supports
- actively promote and make widely available accessible information about how residents and student accommodation staff can access policies and procedures and internal and/or external support services
- undertake a risk assessment in response to all disclosures and formal reports of GBV, and manage and monitor any identified risks on an ongoing basis
- where a disclosure relates to conduct that occurred in student accommodation or at an event organised by a SAP, SAPs must take all necessary immediate action proportionate to the risk arising from the disclosure to ensure the safety of the discloser and/or to other residents or staff - this may include relocation of the respondent and/or arranging available urgent support services for the discloser.

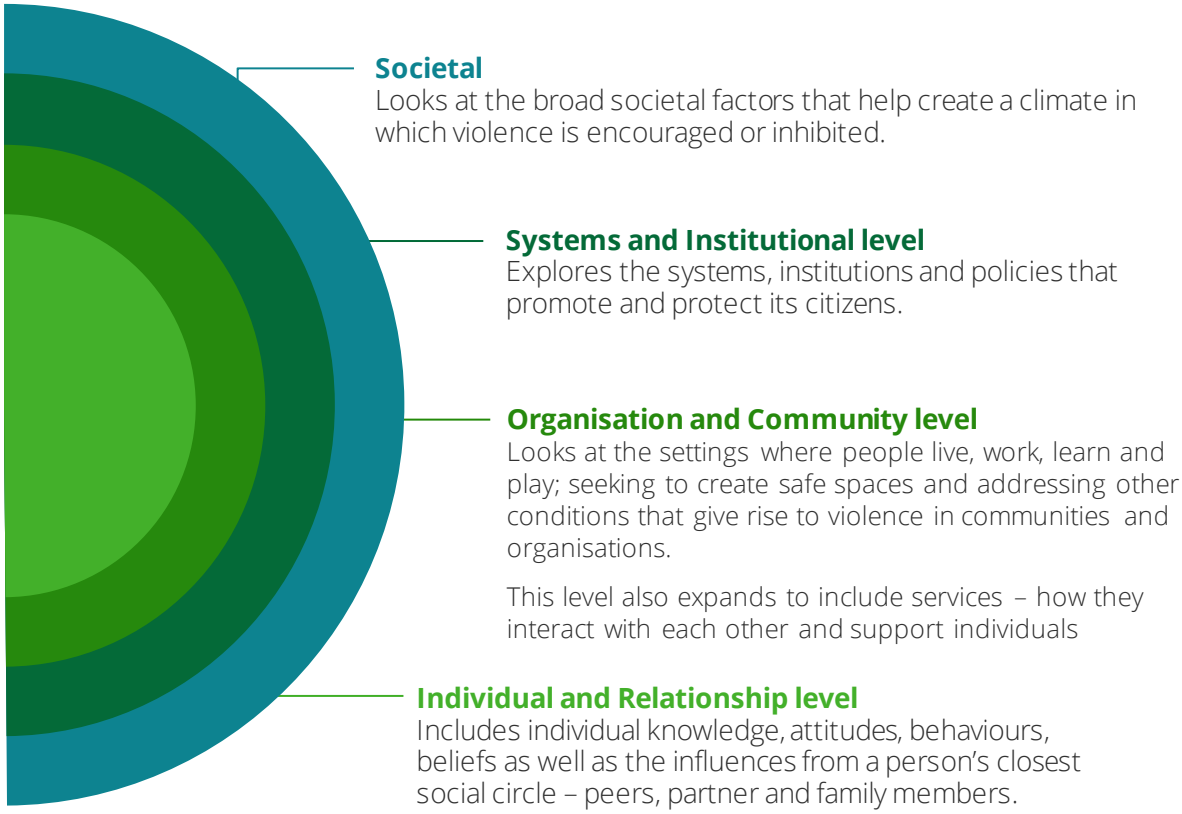
To ensure compliance, HEPs/SAPs affiliated with SAPs are required to enter a legally binding agreement or arrangement that meets the requirements set out in this standard (or amend any existing agreement or arrangement). If the affiliated SAP refuses to implement such an agreement, the HEP/SAP must report this to the Secretary, who may publish their name. Additionally, the HEP must not:

i. authorise the affiliated SAP to continue to use the HEP's intellectual property or any domain names of the HEP/SAP
ii. advertise, market or promote the affiliated SAP, including to the HEPs/SAPs' students
iii. have any agreement in place to reserve spaces for students.

2.3 Intervention logic

Gender-based violence is a complex issue requiring diverse approaches for long-term prevention. The National Plan's social-ecological model recognises that to effectively address GBV, it is necessary to effect change at all four identified levels of society (see Figure 2.1).[110] For lasting change to occur, government interventions must take a multi-sectoral approach that addresses all levels of society at the same time.[111,112] This section outlines research regarding the potential effectiveness of the Code's requirements under each of the seven standards in addressing the drivers of GBV. This provides an evidence base to inform assumptions about the feasible achievement of benefits.

Figure 2.1 The social-ecological model for understanding the drivers of GBV



Source: Australian Government, 'Theory of Change 2022-2032: Under the National Plan to End Violence against Women and Children 2022-2032.' (2022)

2.3.2 Standard 1

Standard 1 is expected to prevent and improve responses to GBV by demonstrating a systematic, whole-of-organisation commitment to addressing GBV and supporting the safety of victim-survivors. Evidence suggests that organisational cultural change is most effective when it is driven by the leadership level of an organisation.[113] For example, Standard 1 of Our Watch's *Workplace Equality and Respect Standards*, 'Commitment', suggests that to effectively promote intersectional gender equality and prevent GBV in workplaces, organisations must demonstrate and communicate an ongoing commitment to address these issues.[114] The whole-of-organisation PRP and outcomes framework aligns with this guidance by comprising a resourced strategy to prevent GBV that is published on its website, articulating a clear and public commitment to gender equality and expectations of workplace behaviour.

A HEP, through its Higher Education Principal Executive Officer, is also accountable for compliance with the Code, allowing students, staff, and the public to hold them responsible for their actions. This requirement reflects Recommendation 1 of

[110] Commonwealth of Australia - Department of Social Services, 'National Plan to End Violence against Women and Children 2022-2032.' (2022)
[111] Daoud Jerab and Tarek Mabrouk, 'The Role of Leadership in Changing Organizational Culture.' (2023)
[112] Daoud Jerab and Tarek Mabrouk, 'The Role of Leadership in Changing Organizational Culture.' (2023)
[113] Daoud Jerab and Tarek Mabrouk, 'The Role of Leadership in Changing Organizational Culture.' (2023)
[114] Our Watch, 'Workplace Equality and Respect Standards' *Our Watch* (2022) <https://www.ourwatch.org.au/workplace/resources/workplace-equality-and-respect-standards>

the Change the Course Report, which emphasises the need for a strong and visible commitment from university leaders, accompanied by clear and transparent GBV policies and procedures.[115] Our Watch's *Workplace Equality and Respect Standards* similarly recommend that to effectively demonstrate their commitment to promoting gender equality and preventing sexual harassment and other forms of GBV, leaders must take responsibility for their organisation's policies and performance.[116]

Furthermore, formalising this responsibility for HEP leaders enforces the National Plan's aim of addressing structural barriers to achieving change by enforcing strong messaging from leadership levels of organisations. The National Plan emphasises that changing the culture of a workplace starts at the top and requires leadership to demonstrate a strong commitment to gender equality and respect, taking instances of violence seriously and responding appropriately.[117]

2.3.3 Standard 2

Standard 2 is intended to enhance accountability, strengthen institutional policies, and foster a culture of safety and transparency. This can impact individual, community and structural factors which drive GBV.

By mandating staff screening and clear consequences for GBV, Standard 2 may reduce risks of GBV at an individual level. Research shows that effective screening procedures not only help to identify potential risks but also serve as a preventative measure against various forms of workplace violence.[118] These screenings contribute to creating safer environments by instilling a sense of trust among students and staff, which in turn promotes safety and security.[119] Once risks are identified, organisations can provide targeted support to individuals who have disclosed past incidents, helping to reduce the risk of re-perpetration.

Clear policies that establish explicit expectations about acceptable behaviours can address structural drivers of GBV and shift social norms towards respect and non-violence.[120] This notion is emphasised by the Action Plan across multiple recommended actions.[121] By embedding trauma-informed, person-centred principles into institutional policies, Standard 2 can work to better ensure that disclosures and formal reports are met with appropriate responses, including support services for disclosers and respondents. This approach can enhance trust in the institution's ability to handle disclosures and formal reports with sensitivity and care.[122,123] Improved trust in leadership and governance structures can directly influence willingness to report suspected violence on campus and promote more effective prevention of future incidents.[124]

Additionally, by prohibiting restrictive NDAs, Standard 2 helps to create a more transparent and accountable environment within higher education institutions. Research has shown that NDAs can silence survivors, discouraging them from sharing their experiences or seeking justice.[125] This silencing effect not only prevents the individual from receiving the help they need but also allows harmful behaviours to persist, which may enable repeat offending.[126] By limiting the use of NDAs,

[115] Australian Human Rights Commission, 'Change The Course: National Report on Sexual Assault and Harassment at Australian Universities', *Australian Human Rights Commission* (2017) <https://humanrights.gov.au/our-work/sex-discrimination/publications/change-course-national-report-sexual-assault-and>
[116] Our Watch, 'Workplace Equality and Respect Standards' *Our Watch* (2022) <https://www.ourwatch.org.au/workplace/resources/workplace-equality-and-respect-standards>
[117] Australian Government Department of Social Service, *The National Plan to End Violence against Women and Children 2022-2032* (2022) <https://www.dss.gov.au/system/files/resources/national-plan-end-violence-against-women-and-children-2022-2032.pdf>
[118] Sugahara, T, et al., *Preventing Workplace Violence and Litigation Through Preemployment Screening and Enforcement of Workplace Conduct Expectations* (New York, NY: Springer New York, 2013) 185
[119] Princewill, A, 'Comprehensive Analysis of Background Screening Impact on Employee Experience and Organisational Outcomes' (2024) 15(5) *Journal of Economic and Finance* 16.
[120] Universities Australia, 'Educating for Equality: A model to address gender-based violence at, and through, Australian universities' *Our Watch* (2021) <https://assets.ourwatch.org.au/assets/Unis-resources/1.1-Educating-for-Equality.pdf>.
[121] Australian Government Department of Education, *Action Plan Addressing Gender-based Violence in Higher Education* (2024) <https://www.education.gov.au/action-plan-addressing-genderbased-violence-higher-education>
[122] Sperlich, M, et al., *Adopting a trauma-informed approach to gender-based violence across the life course. In Understanding gender-based violence: An essential textbook for nurses, healthcare professionals and social workers* (Cham: Springer International Publishing, 2021) 185.
[123] Chu, Y, et al., 'Outcomes of trauma-informed care on the psychological health of women experiencing intimate partner violence: a systematic review and meta-analysis'(2024) 31(2) *Journal of psychiatric and mental health nursing* 203.
[124] Baynard, V, 'Improving College Campus-Based Prevention of Violence Against Women: A Strategic Plan for Research Built on Multipronged Practices and Policies.' (2014) 15(4) *Trauma, Violence, & Abuse* 339.
[125] Pagan, V, '21st century bridling, Non-disclosure agreements in cases of organizational misconduct' (2022) 76(11) *Human Relations* 1827.
[126] Altman, S, 'Selling Silence: The Morality of Sexual Harassment NDAs' (2022) 39(4) *Journal of Applied Philosophy* 698.

Standard 2 can empower survivors to speak out without fear of legal repercussions, supporting more appropriate institutional responses.[127,128]

2.3.4 Standard 3

By mandating GBV-related education and training in higher education settings, Standard 3 may influence a culture of awareness, understanding, empathy, and reduced stigma. Research suggests that successful GBV interventions not only decrease the incidence of GBV but also increase students' knowledge of and change attitudes towards GBV.[129] To this degree, effective training can influence individual, community, and societal drivers of GBV.

Existing research suggests that addressing attitudes and norms through 'primary prevention' approaches such as education and training is a key element of preventing GBV.[130] For example, a study by ANROWS (2023) into a GBV prevention program for Year 7 and 9 students in Victorian secondary schools, found that following completion of the program, there was a decrease in the number of students who said they sexually bullied other students, and that overall young people found the program engaging, relevant and helpful.[131]

While it is acknowledged that this education and training will target older demographics and likely be less intensive, the Action Plan and the Change the Course report emphasise the importance of embedding evidence-based primary prevention activities and respectful relationships education for students and staff in higher-education settings.[132] A study commissioned by ANROWS investigating mistrust in women's reports of sexual assault, also highlights GBV educational initiatives in schools, workplaces and universities can foster a strengthened culture around supporting victim-survivors and dispelling myths around GBV that are used to discredit their lived experiences.[133]

The Action Plan also emphasises that expert-led response training for students and staff is integral to building best-practice, trauma-informed response systems.[134] While prevention training can influence awareness and understanding, response training can better prepare participants to respond to this sensitive issue.[135] Negative reporting experiences can be extremely detrimental to the wellbeing of victim-survivors and can discourage future disclosers from coming forward.[136] As a result, helping more staff, leadership, and student leaders prepare for how to respond to disclosures and formal reports can help foster a stronger sense of trust and safety among victim-survivors.

2.3.5 Standard 4

Standard 4 aims to ensure HEPs offer accessible, high-quality and person-centred response and support services to students and staff who disclose or report GBV. This can provide a supportive, safe environment where victim-survivors can disclose their experiences without fear of re-traumatisation and receive appropriate resources to support their recovery. It is intended that Standard 4 apply to all GBV that an institution's students and staff may experience, regardless of whether it occurs on or off campus, to address the relational drivers of GBV.

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[127] Asta, M, 'For the Workers: Banning Non-Disclosure Agreements in Harassment and Discrimination Settlements' (2022) 51 *UL Rev* 400.
[128] Westall, K., '#cantbuymysilence: A Cast Study and Intersectional Analysis on Non-disclosure Agreement (NDA) Legislation'. (2024) *Toronto Metropolitan University* <https://rshare.library.torontomu.ca/articles/thesis/_cantbuymysilence_A_Case_Study_and_Intersectional_Analysis_on_Non-disclosure_Agreement_NDA_Legislation/26052928?file=47105011>
[129] Gibbons, R, et al.,'The Evaluation of Campus-Based Gender Violence Prevention Programming; What We Know about Program Effectiveness and Implications for Practitioners' (2013) *National Online Resources Centre on Violence Against Women* <https://vawnet.org/material/evaluation-campus-based-gender-violence-prevention-programming-what-we-know-about-program>
[130] OurWatch, 'Respectful relationships education to prevent gender-based violence.' (2020) <https://www.ourwatch.org.au/education/resources/final-evaluation-report>; VicHealth 'Preventing violence before it occurs: A framework and background paper to guide the primary prevention of violence against women in Victoria.' (2007) <https://www.vichealth.vic.gov.au/media-and-resources/publications/preventing-violence-before-it-occurs>.
[131] Cahill, H., et al. *A social network analysis and implementation study of an intervention designed to advance social and emotional learning and respectful relationships in secondary schools*. Australia's National Research Organisation for Women's Safety (ANROWS, 2023) 95.
[132] Australian Government Department of Education, *Action Plan Addressing Gender-based Violence in Higher Education* (2024) <https://www.education.gov.au/action-plan-addressing-genderbased-violence-higher-education>
[133] Kate Minter et al. '"Chuck her on a lie detector"—Investigating Australians' mistrust in women's reports of sexual assault.' (2021) ANROWS. <https://www.anrows.org.au/publication/chuck-her-on-a-lie-detector-investigating-australians-mistrust-in-womens-reports-of-sexual-assault/read/>
[134] Australian Government Department of Education, *Action Plan Addressing Gender-based Violence in Higher Education* (2024) <https://www.education.gov.au/action-plan-addressing-genderbased-violence-higher-education>
[135] Hegarty, K et al., 'Transforming health setting to address gender-based violence in Australia'(2022) 217(3) *Medical journal of Australia* 159.
[136] Goicolea, I, et al., 'Disclosing Gender-Based Violence: A Qualitative Analysis of Professionals' and Women's Perspectives through a Discursive Approach' (2022) 19(22) *International journal of environmental research and public health* 14683.

The effectiveness of such support services is directly linked to the extent to which they are accessible, tailored to individual needs, and underpinned by a culture of care and respect.[137, 138, 139] A core principle of Standard 4 is the provision of tailored support plans for both disclosers and respondents. These plans must be developed by staff with expertise in GBV and address the specific needs of each individual. As previously noted, research has shown that such tailored, person-centred support not only reduces traumatisation but also enhances the likelihood of positive outcomes for survivors. By aligning support services with the individual's needs and preferences, HEPs can help to empower survivors and facilitate their own recovery process.[140] Evidence also shows that support for alleged perpetrators can lead to changed behaviours and a reduction in the risk of re-perpetration.[141]

Standard 4 mandates HEPs conduct ongoing risk assessments to monitor and manage any identified risks to both disclosers and respondents. These assessments ensure that safety measures are implemented and adjusted as necessary. This ongoing monitoring can improve the responsiveness of a HEP's support system to ensure it meets the evolving needs of its students and staff.[142] Regular evaluations of the effectiveness of support services further ensure that HEPs are continually improving their practices in line with best practices in GBV support.[143]

2.3.6 Standard 5

Standard 5 promotes safer processes for addressing GBV by placing the needs and autonomy of victim-survivors at the centre of response systems. This is aligned with the person-centred responses emphasised by the National Plan and the Action Plan.[144, 145]

Standard 5 requires that all disclosure and investigation processes must have regard to the wishes of the discloser. This approach prioritises the needs and autonomy of victim-survivors, which best-practice guidance indicates is paramount to achieving positive reporting experiences.[146] In particular, it can support disclosers to feel that decisions are being made with them and not for them, avoiding a sense of disempowerment, which can be triggering for victim-survivors as GBV often involves feeling as though one has lost control to the person using violence.[147, 148]

It is widely understood that GBV remains underreported.[149] There are complex reasons why victim-survivors may choose not to report, including shame, societal stigma, humiliation, fear of retaliation from the perpetrator/s, and/or distrust of response and support systems and services.[150] Further, not all victim-survivors disclose for the same reason, for example, some will require safety measures to be taken against their perpetrator/s, while others disclose in order to access support services.[151] Alternative reporting options, such as through online, informal, or anonymous channels, can provide victim-

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[137] Sperlich, M, et al, *Adopting a trauma-informed approach to gender-based violence across the life course. In Understanding gender-based violence: An essential textbook for nurses, healthcare professionals and social workers* (Cham: Springer International Publishing, 2021) 185.
[138] Grossman,S, et al., 'Trauma-informed care: recognizing and resisting re-traumatization in health care' (2021) 6(1) *Trauma surgery & acture care open*.
[139] Bond,K, et al., 'Improving the Likelihood of Positive Outcomes for Survivors of Sexual Violence, Considering Intersections Between Justice, Gender and Trauma' (2024), Social Policy & Administration, Wiley Online Library <https://onlinelibrary.wiley.com/doi/full/10.1111/spol.13110>
[140] Cattaneo,L, et al., 'Survivor-Centered Practice and Survivor Empowerment: Evidence from A Research-Practitioner Partnership.' (2020) 27(9) *Violence Against Women.*
[141] Victorian Government Family Violence Reform Implementation Monitor, *Evidence base for perpetrator interventions* (2023) <https://www.fvrim.vic.gov.au/monitoring-victorias-family-violence-reforms-service-response-perpetrators-and-people-using-violence-within-family/evidence-base-perpetrator-interventions>
[142] Welsh,B et al., 'Evidence-based policy in a new era of crime and violence prevention and social justice' (2024) 77 *Aggression and Violent Behavior* 101940.
[143] Peterson, C, et al, 'Systematic review of violence prevention economic evaluations' (2021) 60(4) *American journal of preventive medicine* 552.
[144] Australian Government Department of Social Service, *The National Plan to End Violence against Women and Children 2022-2032* (2022) <https://www.dss.gov.au/system/files/resources/national-plan-end-violence-against-women-and-children-2022-2032.pdf>2022)
[145] Australian Government Department of Education, *Action Plan Addressing Gender-based Violence in Higher Education* (2024) <https://www.education.gov.au/action-plan-addressing-genderbased-violence-higher-education>
[146] Australian Women Against Violence Alliance, 'Good practice principles in addressing sexual and gender-based violence: Drawing on the unique practice model of specialist women's services' (2020), *Australian Women Against Violence Alliance* <https://awava.org.au/wp-content/uploads/2020/12/AWAVA_Good-Practice-Principles-brochure_2020-Update_final.pdf>.
[147] Ibid.
[148] Australian Human Rights Commission, 'Change The Course: National Report on Sexual Assault and Harassment at Australian Universities,' *Australian Human Rights Commission* (2017) <https://humanrights.gov.au/our-work/sex-discrimination/publications/change-course-national-report-sexual-assault-and>
[149] Social Research Centre (SRC), 'National Student Safety Survey', *National Student Survey* (2022) <https://www.nsss.edu.au/results>
[150] Heydon,G et al., 'Alternative reporting options for sexual assault: Perspectives of victim-survivors. Trends & Issues in Crime & Criminal Justice' (2023) 678 *Trends and Issues in Crime and Criminal Justice* 1.
[151] Australian Institute of Health and Welfare, *How do people respond to FDSV?* (2024) <https://www.aihw.gov.au/family-domestic-and-sexual-violence/responses-and-outcomes/how-do-people-respond-to-fdsv

survivors with flexibility and autonomy over their disclosure experience and can thereby reduce barriers and increase overall reporting rates.[152] By also allowing third parties to make disclosures or formal reports on behalf of victim-survivors, the burden of responsibility can be shifted away from them, which can be a key barrier to seeking support, while empowering bystanders to take action.[153]

Standard 5 also requires HEPs to promote their GBV policies and reporting options to students and staff, so they are aware of what support they can seek. The 2021 NSSS highlighted that over half of students knew nothing or very little about the formal reporting processes for sexual harassment and assault in their universities. The survey also found that just under half of students knew nothing or very little about where to seek support or assistance for harassment or assault in their universities.[154] A lack of awareness of the availability of disclosure and support services within higher education settings is likely to contribute to underreporting due to a reduced sense of support for help-seeking. By requiring HEPs to clearly explain GBV reporting processes, the Code may help address this issue and potentially improve reporting rates.

2.3.7 Standard 6

Standard 6 can support efforts to prevent and improve responses to GBV to be evaluated to assess their practical effectiveness. While HEPs already collect and report data on student and staff experiences of sexual violence, current requirements do not include information on all types of GBV and there is limited data on incidents in student accommodations.[155] There are also inconsistencies in data terminology, collection, and reporting within and between providers, and between providers and national surveys.[156] To address these gaps and inconsistencies, Standard 6 outlines explicit requirements around the data that HEPs must collect on GBV, including process, incidents, and discloser and respondent demographic characteristics data.

By requiring HEPs to collect and analyse key data on incidents in their setting and their processes for responding, the Code supports progress towards the Change the Course report's recommendation that actions taken to prevent and respond to GBV should be evidence-based and improve over time.[157]

The Standard will also require HEPs to annually report this data to the Department. This requirement is intended to provide the Department with a consistent, national dataset to monitor compliance as well as to measure change and identify trends across the sector. This approach supports Action Six of the Action Plan to support improvement across the sector through increased data transparency and scrutiny.[158]

2.3.8 Standard 7

Standard 7 addresses the fact that students living in student accommodation face a heightened risk of GBV and supports Action Four of the Action Plan to enhance the oversight, standards, and accountability of student accommodations to provide a safe environment for student residents.[159,160,161] Given these risks, Standard 7 aims to ensure all standards of the Code are fully applied within student accommodation environments to better support the provision of a safe and supportive living space. This not only mitigates risk but also reinforces a culture of safety, respect, and transparency. By ensuring that residential settings are held to the same standards as the broader higher education community, HEPs can better uphold their duty of care.

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[152] Loney-Howes, R et al.,'Connecting survivors to therapeutic support and criminal justice through information reporting options: An analysis of sexual violence reports made to a digital reporting tool in Australia' (2022) 34(1) *Current Issues in Criminal Justice* 20.
[153] Australian Institute of Health and Welfare, *How do people respond to FDSV?* (2024) <https://www.aihw.gov.au/family-domestic-and-sexual-violence/responses-and-outcomes/how-do-people-respond-to-fdsv>
[154] Social Research Centre (SRC), 'National Student Safety Survey', *National Student Survey* (2022) <https://www.nsss.edu.au/results>
[155] Australian Government Department of Education, *Proposed National Higher Education Code to Prevent and Respond to Gender-based Violence 2025* (2025) <https://www.education.gov.au/action-plan-addressing-genderbased-violence-higher-education/resources/proposed-national-higher-education-code-prevent-and-respond-genderbased-violence-2025>
[156] Ibid.
[157] Australian Human Rights Commission, 'Change The Course: National Report on Sexual Assault and Harassment at Australian Universities', *Australian Human Rights Commission* (2017) <https://humanrights.gov.au/our-work/sex-discrimination/publications/change-course-national-report-sexual-assault-and><https://humanrights.gov.au/our-work/sex-discrimination/publications/change-course-national-report-sexual-assault-and>.
[158] Australian Government Department of Education, *Action Plan Addressing Gender-based Violence in Higher Education* (2024) <https://www.education.gov.au/action-plan-addressing-genderbased-violence-higher-education>
[159] Social Research Centre (SRC), 'National Student Safety Survey', *National Student Survey* (2022) <https://www.nsss.edu.au/results>
[160] Australian Human Rights Commission, 'Change The Course: National Report on Sexual Assault and Harassment at Australian Universities,' *Australian Human Rights Commission* (2017) <https://humanrights.gov.au/our-work/sex-discrimination/publications/change-course-national-report-sexual-assault-and>
[161] Australian Government Department of Education, *Action Plan Addressing Gender-based Violence in Higher Education* (2024) <weshttps://www.education.gov.au/action-plan-addressing-genderbased-violence-higher-education>

3 Methodology

This chapter outlines the methodology used to quantify the impact of the proposed National Code on key stakeholders.

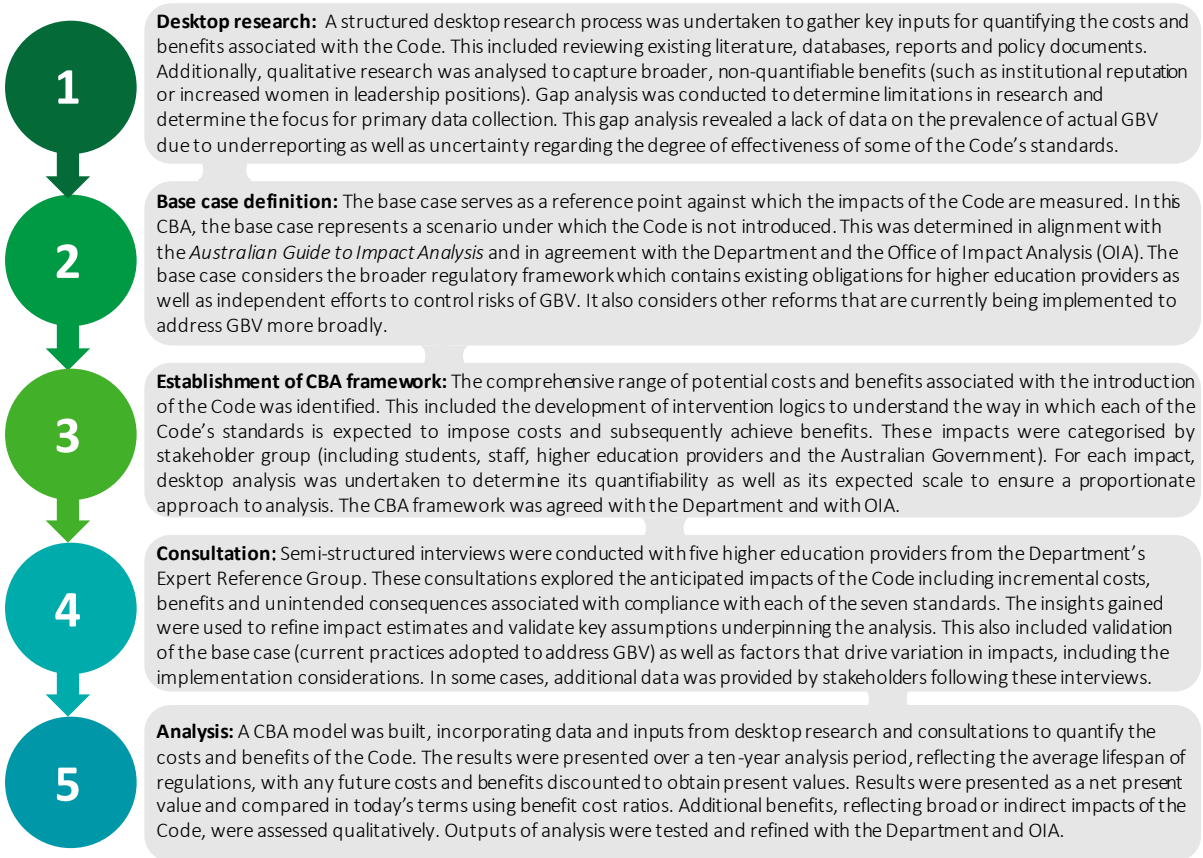
3.1 Approach to cost-benefit analysis

This Chapter outlines the methodology used to analyse the potential impacts (costs and benefits) of the proposed National Code on students, staff, HEPs, and the Australian Government. The Code has been assessed using a CBA, which provides a robust, structured, and transparent approach to balancing different impacts, modelling the potential economic costs and benefits where possible.

3.1.1 CBA methodology

CBA is a tool that supports evidence-based policy making by calculating the incremental costs and benefits of a regulatory intervention relative to a comparative base case, that is, what would occur in the absence of the specific legislative change and implementation of the Code. To undertake this analysis, a five-step method has been applied to ensure an evidence-based approach to estimating impact (Figure 3.1).

Figure 3.1 CBA methodology



Source: Deloitte Access Economics, 2025.

As outlined in Chapter 2, under the base case, HEPs have existing obligations to students and staff under legislation on the provision of education and workplace health and safety (see section 2.1). Though varied, most HEPs also have internal policies on interpersonal relationships, including GBV. Therefore, the costs attributable to the introduction of the Code only represent any incremental costs spent over and above current practices.

In this CBA, the costs associated with each standard are aggregated and compared to the benefits of the Code as a whole. This is to reflect the fact that the standards are intended to work together to achieve benefits. The difference between the benefits the Code delivers (e.g. incremental benefits and improvements in the form of increased safety and wellbeing) and the cost of additional time, effort and other resources to implement the Code is measured both in terms of net present value (NPV) of the total costs and benefits, as well as the BCR.

The BCR refers to the scale of quantified benefits relative to quantified costs, expressed in the form of a ratio (where benefits are divided by costs). A BCR greater than one indicates that the quantified benefits related to the Code are greater than quantified costs (or, for every $1 of cost incurred, a benefit of greater than $1 is achieved). As such, any BCR that is equal to or greater than one can be expected to result in a positive impact in aggregate.

Costs and benefits have been monetised where possible. All monetary figures reported are in terms of their current dollar value (the 'real value').[162] As consistent with Australian regulatory impact guidelines, the costs and benefits have been modelled in net-present-value (NPV) over a period of ten years.[163] Calculating the impact in NPV terms, as is best practice, ensures that the estimates of benefits and costs are discounted at a real rate of seven per cent.[164] As required by the Australian Government, sensitivity analysis is undertaken on this discount rate as well as any other assumptions that are uncertain and have a significant impact on the results of the CBA.[165]

3.1.2 Desktop research and consultation to inform inputs

3.1.2.1 Desktop research

Desktop research was conducted to inform assumptions, including the incidence rate of GBV, the rate of GBV reporting to a HEP, and the potential impacts of the Code. This research incorporated a wide range of sources to ensure robustness and depth of analysis. The evidence base for this CBA included (but is not limited to):

- quantitative data and documents provided by the Department
- government reports from large-scale commissions and inquiries, including those which make recommendations on GBV interventions in higher education
- reports and studies from research institutions such as the Australian Institute of Health and Welfare (AIHW) and the Social Research Centre (SRC)
- peer-reviewed academic journals
- grey literature from industry sources.

Additionally, this CBA drew on qualitative research to help capture broader benefits that are difficult to quantify (such as institutional reputation or increased rates of women in leadership positions).

Gap analysis was conducted to determine limitations in the available evidence base and to determine the focus for primary data collection. Through the research process, gaps and areas of uncertainty were identified in the existing literature and data sources. In some cases, available research addressed similar themes, such as workplace health and safety, but lacked specificity regarding students in higher education settings. Other sources provided links between interventions and potential benefits, but did not quantify their scale or indicate the likely effectiveness or provide evidence for all relevant benefits. Additionally, national crime databases and prevalence studies do not currently capture the number of victim-survivors and perpetrators of GBV who are university students or staff. This gap hinders the accurate assessment of prevalence, incidence rates, and risk levels within the sector. Further, the lack of national data on the prevalence and experiences of transgender, non-binary and gender-diverse students and staff with GBV in higher education settings limits the ability for this report to estimate how the Code will impact this cohort. These gaps introduced uncertainty in quantifying the costs and benefits associated with the Code, requiring a structured approach to addressing these limitations to ensure that the findings remained as robust and reliable as possible.

3.1.2.2 Consultation

The scope of this project included semi-structured interviews with five higher education providers from the Department's existing Expert Reference Group, which the Department convened to provide input to the development and drafting of the Code. Consultation with the broader industry (including affiliated/associated SAPs), students, and staff was not in the scope of this analysis. To estimate the costs to these stakeholders, this analysis relies on inputs and assumptions determined in consultation with the Department's Expert Reference Group.

[162] Office of Impact Analysis, 'Australian Government Guide to Policy Impact Analysis' (2023)
[163] Ibid.
[164] Ibid.
[165] Ibid.

Insights gathered through consultation were used to refine impact estimates and validate key assumptions underpinning the analysis (i.e., HEP's understanding of the code and whether their current policies are sufficient to be compliant with the Code). Consultations included questions regarding the feasible range of costs, potential benefits, and any aspects of the Code that posed uncertainty. This included validation of the base case (current practices adopted by HEPs to address GBV) as well as factors that drive variation in impacts, including implementation considerations. In some cases, additional data was provided by stakeholders following these interviews. Further information on consultations is provided in Appendix A.

3.1.3 Addressing the uncertainty in quantifying the costs and benefits

Structured desktop research and stakeholder consultation were undertaken to gather insights on the costs and benefits of the Code (see section 3.1.1). This process highlighted limitations in the available evidence base, which create uncertainty in assessing the impacts of the Code. Uncertainty stems from the fact that there is limited evidence on the precise effectiveness of GBV interventions, the actual prevalence and rate of incidence of GBV are unknown due to underreporting, and the likely variation in HEP responses to the Code. This variation is influenced by each organisation's risk profile and the extent to which its current policies, systems, and procedures reflect best practice.

Consultations with the Department's Expert Reference Group provided valuable insights into the perspectives of impacted stakeholders, including input on the identified areas of uncertainty (see section 3.1.2). These discussions helped to verify key assumptions underpinning the categorisation of impacts and analytical approach. These consultations also highlighted that some uncertainty is expected to remain until and during the implementation of the Code itself.

This makes it difficult to estimate with precision the total expected economy-wide impacts of the proposed reform options. It is possible, however, to use this CBA to provide an illustrative estimate of feasible costs and potential benefits, subject to a number of assumptions, and to test and demonstrate the likelihood that the benefits outweigh the costs.

3.1.3.1 As an emerging area of health and safety, there is limited evidence on the precise effectiveness of GBV interventions

The Code aims to address the risk of harm to students and staff in the Australian higher education sector as a result of exposure to GBV.[166] Research shows that multi-faceted interventions which address the drivers and reinforcing factors of GBV (including structural, societal, community, relationship and individual factors) are most likely to contribute to its prevention.[167] Further, there is evidence to suggest that trauma-informed and person-centric approaches to response can have positive impacts on victim survivors.[168,169] The research and evidence base for these positive impacts emphasise not just that interventions with a wide range of overlapping or interacting components can have positive impacts, but that having a positive impact *requires* interventions that seek to improve or change multiple factors at once.[170]

This means that while research establishes a link, there is limited evidence on the extent of improvement created by GBV interventions or the extent to which improvement can be attributed to any one aspect of these multi-faceted interventions. As a current focus area of regulatory reform, related interventions are still new and their long-term effects on incidence rates are not yet clear. This impacts the degree of certainty with which estimates of exact effectiveness or impact of the Code can be made.

3.1.3.2 Research indicates high levels of underreporting for GBV, meaning that the actual incidence is unknown

The true incidence rate of GBV in society and higher education is unknown due to high levels of underreporting. While the Personal Safety Survey, a national prevalence study undertaken every four years,[171] and recent surveys of students and staff in higher education settings indicate a high prevalence of GBV in Australia, these same studies also highlight low rates of

[166] Australian Government Department of Education, *Proposed National Higher Education Code to Prevent and Respond to Gender-based Violence 2025* (2025) <https://www.education.gov.au/action-plan-addressing-genderbased-violence-higher-education/resources/proposed-national-higher-education-code-prevent-and-respond-genderbased-violence-2025>

[167] Courage to Act, 'What is the Socio-Ecological Model and How does it Apply to Gender-Based Violence Work? *Courage to Act Foundation* (2022) <https://www.couragetoact.ca/blog/socioecological-model>

[168] Sperlich, M, et al, *Adopting a trauma-informed approach to gender-based violence across the life course. In Understanding gender-based violence: An essential textbook for nurses, healthcare professionals and social workers* (Cham: Springer International Publishing, 2021) 185.

[169] Chu, Y, et al, 'Outcomes of trauma-informed care on the psychological health of women experiencing intimate partner violence: a systematic review and meta-analysis'(2024) 31(2) *Journal of psychiatric and mental health nursing* 203.

[170] Arango, D et al., 'Interventions to Prevent or Reduce Violence Against Women and Girls: A Systematic Review of Reviews' (2014) The World Bank

[171] Australian Bureau of Statistics, *Personal Safety, Australia* (2023) <https://www.abs.gov.au/statistics/people/crime-and-justice/personal-safety-australia/latest-release>

disclosure and formal reporting contributing to low incidence rates.[172, 173, 174] The National Students Safety Survey suggests that, in Australian higher education settings, the reporting rate may be as little as three per cent.[175] Research attributes this underreporting to factors such as stigma, shame, and fear of reprisal.[176] Furthermore, because there has never been a national perpetration study, there is limited understanding of the rate of perpetration.

As a result, available data likely underrepresents the full extent of harm caused by GBV, making it difficult to accurately determine GBV prevalence and the rate of new incidence. This uncertainty extends to projecting the potential increase in disclosures or formal reports following the introduction of the Code. The scale of both the costs (as ongoing costs to HEPs are driven by the number of disclosures and the scope of prevention activity) and benefits (as reduced incidence directly impacts harm reduction) is impacted by this uncertainty. The analysis makes assumptions to reflect the extent of underreporting under the base case (i.e. under the current status quo) and how this will likely change over time.

3.1.3.3 Responses to the Code by HEPs may vary

The Code allows flexibility in some instances to allow HEPs to implement control measures that are appropriate and proportionate to the level of risk within their organisation. This means impacts will depend on how individual HEPs change their current activities in response to the introduction of the Code. During stakeholder consultation, it was confirmed that factors which drive this variation include:

- HEP size
- relevant geographic jurisdiction and existing laws across each State and Territory
- the baseline rate of reporting, and familiarity with, GBV in each HEP
- the degree to which current activities undertaken by each HEP reflect best practice.

During stakeholder consultations with select HEPs, HEPs identified several key barriers to addressing GBV. These barriers represent areas where HEPs consider they will require support with the implementation of the Code, and which may impact their level of compliance. These challenges include:

- GBV is a broad term which can take a wide range of forms, leading to uncertainty about what forms of GBV a HEP must be prepared to respond to in accordance with the Code and how to appropriately respond
- promising evidence-informed interventions can be complex and costly, presenting a barrier to adoption (for example, stakeholders highlighted that some activities such as integrating datasets can be resource intensive and require higher levels of expertise than may be available in-house in the short-term)
- even when effective practices for preventing and addressing GBV are clear, translating these practices into clear, actionable steps for staff at all levels is a significant undertaking (for example, stakeholders who have already made substantial progress emphasised the effort required to embed best practices into everyday roles and processes at a whole-of-organisation level).

Noting this uncertainty among HEPs, this CBA presents illustrative scenarios of feasible impact and has been prepared based on a range of assumptions regarding the likely behaviours of HEPs in response to the introduction of the Code. The results of this CBA should be regarded as a test of whether the benefits of the Code are likely to exceed costs, rather than a point estimate of the specific impacts. To this extent, depending on alternative scenarios and responses of HEPs, the benefit-cost ratio (BCR) of the proposed reforms at a whole-of-economy level may vary. Given the analysis's reliance on key assumptions, sensitivity analysis has also been conducted to test the impact on the results of those key assumptions (see section 6.2).

While the Code will be implemented before uncertainties can be fully addressed, ongoing monitoring and evaluation throughout implementation and administration will provide valuable insights into its actual effectiveness and areas for future improvement.

3.1.3.4 Accounting for the different forms of GBV and varying levels of risk in the quantification of costs and benefits

GBV can take many forms both physical and non-physical as well as overt and subtle. Every unique case impacts a victim-survivor differently, and some forms can disproportionately impact different population cohorts. This variation creates

[172] Social Research Centre (SRC), 'National Student Safety Survey', *National Student Survey* (2022) <https://www.nsss.edu.au/results>>
[173] National Tertiary Education Union, 'New survey reveals shocking rise in sexual harassment at universities', *National Tertiary Education Unit* (2023) <https://www.nteu.au/News_Articles/Media_Releases/Sexual_Harassment_Survey_Report.aspx>
[174] Australian Human Rights Commission, 'Change The Course: National Report on Sexual Assault and Harassment at Australian Universities', *Australian Human Rights Commission* (2017) <https://humanrights.gov.au/our-work/sex-discrimination/publications/change-course-national-report-sexual-assault-and>
[175] Social Research Centre (SRC), 'National Student Safety Survey', *National Student Survey* (2022) <https://www.nsss.edu.au/results>>
[176] Stevens, L, et al,' A critical analysis of gender-based violence reporting and evidence building applications (GBVxTech) for capturing memory reports' (2024) 14 *Frontiers in psychology* 1289817.

uncertainty when estimating the general scale of harm caused by GBV (both under the base case and the proposed Code) as the nature and severity of impacts, and the appropriate responses, differ between cases.

Further, as research on the subject continues to evolve, HEPs will be required to respond to new forms of GBV where there is little or no current research on the experiences of and impacts on victim-survivors. For example, an area of growing research is around technology-facilitated abuse, or technology-facilitated coercive control, which initial studies indicate can disproportionately impact young people.

As a result, while this CBA presents an estimate of the harm caused by GBV to victim-survivors based on research available at the time of writing, there remains uncertainty around the actual number of students and staff affected by GBV and the overall scale of harm caused. This affects both the estimated costs (as ongoing costs to HEPs are driven by the number of disclosures) and benefits (as reduced rates of incidence directly impact harm reduction).

While all students and staff are expected to benefit from improved measures to prevent and respond to GBV, the scale of benefit is likely contingent upon the respective risk they face. For example, research suggests that men experience significantly lower rates of GBV than women. Therefore, to prevent overestimating the impact of the Code, the core results of this CBA focus on a reduction in the GBV experienced by university students and staff who identify as female (i.e. those most at risk). There are likely to be further distributional impacts on different cohorts of women, such as culturally and linguistically diverse women, women with disabilities, or First Nations women. While prevalence studies indicate that these cohorts face a disproportionate risk of experiencing GBV, it is difficult to determine the marginal benefit a prevented case or improved response would provide to such cohorts above the general benefit to all women. This uncertainty limits the ability of this CBA to estimate the distributional effects of the Code on different cohorts of women.

3.1.4 CBA framework

The framework for this CBA is illustrated in Figure 3.2. As outlined in Chapter 2, the Code seeks to ensure HEPs create safe, respectful and inclusive higher education environments with embedded and effective responses to GBV that prioritise safety, health and wellbeing. Each standard introduces new legal obligations for HEPs, requiring additional activities to ensure compliance.

In the process of meeting these requirements, each of the seven standards of the proposed National Code will impose costs (in terms of financial and labour resources) on four key stakeholder groups - HEPs, staff of HEPs, students, and the Australian Government (see Table 3.1). This CBA assesses the potential costs for each stakeholder group.

Table 3.1 Key stakeholders impacted by the Code

Stakeholders impacted by the Code	Description
HEP	Australian HEPs registered under TEQSA. This report estimates that there are 211 registered HEPs.[177]
SAP	The Code will also impact HEPs who may own, operate, manage or control a SAP. There are an estimated 207 SAPs owned and or operated by Australian HEPs.[178]
Staff of HEPs	All staff of higher education providers, including those hired to work in their student accommodations. See the Glossary for a more precise definition. Australian Government Workplace Gender Equality Agency data indicates that there are 259,865 staff employed by the higher education sector.[179]
Students of HEPs	All persons who are enrolled in a course of study or a unit of study with a HEP. This report estimates that there are 1.6 million students enrolled in the Australian higher education sector.[180]

[177] TEQSA's National Register of Higher Education Providers and Courses; data supplied by the Department of Education (2025).
[178] Estimations based on information provided by the Department of Education (2025).
[179] Estimations based on information from the Australian Government Workplace Gender Equality Agency (2025).
[180] Data supplied by the Department of Education (2025).

Stakeholders impacted by the Code	Description
Australian Government	The Code is proposed as Commonwealth legislation, and the Australian Government will bear the costs of administering and enforcing its requirements.

Note: This analysis does not consider how the Code and any of its associated regulatory changes will impact standalone SAPs, as this is out-of-scope of the current Code. The summary of costs and benefits in this document also does not differentiate impact across different categories of accommodation types provided by HEPs.

Source: Deloitte Access Economics, 2025.

3.1.4.2 Costs assessed in this CBA

The **costs** associated with each of the proposed standards of the Code reflect the additional resources stakeholders must allocate toward initial implementation and ongoing compliance. This includes the opportunity cost of staff time, resource allocation for new activities, and any financial or capital costs associated with updating processes, practices, and systems, as well as additional operating and administrative expenses, including costs associated with hiring new staff members to meet expertise requirements. These costs are incremental to what would occur in the absence of these changes (the base case).

For **HEPs**, this includes one-off transition costs relating to the time and effort required by staff to understand the proposed reforms. This also involves the time and effort required to develop or update systems for incident data capture and reporting (for example, amendments to internal people management and safety data systems). HEPs are also expected to incur ongoing yearly costs associated with compliance, monitoring and reporting. These costs differ across standards, and some costs will scale based on the number of disclosures or formal reports made by students and staff within each HEP. In many cases, costs will also be influenced by each HEP's size, number of resources, and current level of relevant in-house GBV expertise.

Requirements for HEPs are also expected to create some flow-on costs to **students, and staff and volunteers**. These stem from the time spent undertaking activities mandated by the Code, such as participating in mandatory GBV education and training. An estimation of these costs is provided in this CBA based on the opportunity cost of the time spent undergoing these activities.

There will also be costs to the **Australian Government** associated with implementation, administration, and enforcement. This is likely to include costs associated with a dedicated office to administer and monitor adherence to the Code, including additional staff time required to process data, respond to non-compliance, and respond to queries from HEPs and the public about the Code.

3.1.4.3 Benefits assessed in this CBA

The prescriptive requirements introduced under the Code aim to ensure consistency in the application of evidence-based processes for addressing and responding to GBV across the sector.[181] The standards are designed to work together to reduce the harm associated with GBV in higher education.[182]

A reduction in this harm is intended to yield a wide range of physical, social, and emotional benefits to individuals, as well as cultural, financial, and reputational benefits to HEPs, healthcare systems, and the community at large.[183] Aside from the direct benefits of avoiding or reducing harm associated with GBV, broader benefits to both individuals and the economy, including the increase of women's participation in the workforce and leadership, improved student attraction to and retention in higher education, and changing social norms, have also been analysed.[184]

While these benefits are expected to make a meaningful contribution to individual wellbeing and avoid costs to HEPs, governments, health care systems and the community, many broader, whole-of-society improvements are challenging to quantify and/or to attribute directly to the Code itself in isolation from other initiatives and reforms underway (see a more

[181] Australian Government Department of Education, *Action Plan Addressing Gender-based Violence in Higher Education* (2024) <https://www.education.gov.au/action-plan-addressing-genderbased-violence-higher-education>

[182] Australian Government Department of Education, *Proposed National Higher Education Code to Prevent and Respond to Gender-based Violence 2025* (2025) <https://www.education.gov.au/action-plan-addressing-genderbased-violence-higher-education/resources/proposed-national-higher-education-code-prevent-and-respond-genderbased-violence-2025>

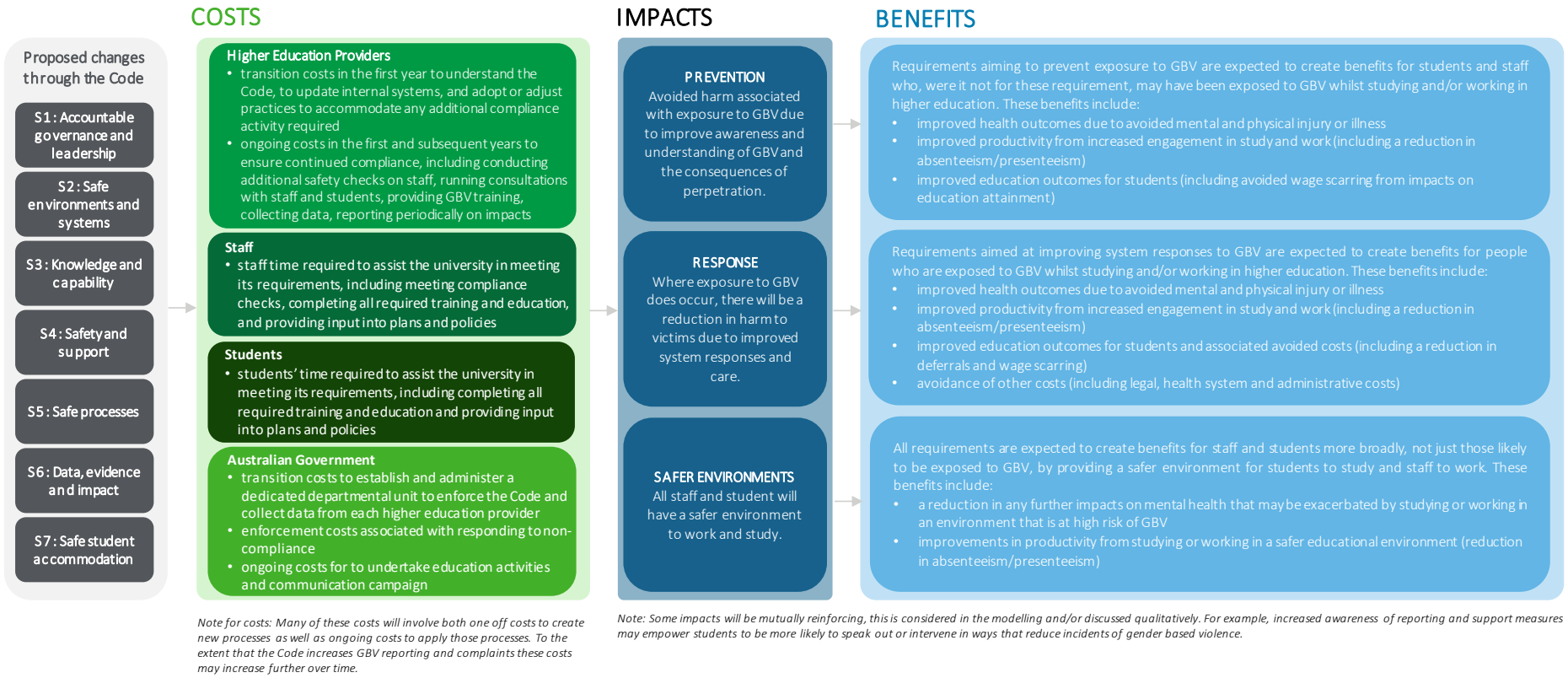
[183] Australian Institute of Health and Welfare, *Family, domestic and sexual violence: Health services* (2024) <https://www.aihw.gov.au/family-domestic-and-sexual-violence>

[184] Australian Institute of Health and Welfare, *Family, domestic and sexual violence: Economic and financial impacts* (2024) <https://www.aihw.gov.au/family-domestic-and-sexual-violence>

in-depth discussion of these benefits in Chapter 5). Because the potential benefits of the Code are only partially quantifiable, this CBA takes a conservative approach to benefits estimation by quantifying and monetising the more direct impacts of the Code and assessing the extent to which these are likely to offset the costs of actions undertaken as a result of the Code. The direct benefits assessed in this CBA accrue primarily to students and staff (including volunteers) and include:

- safer environments: improved safety on higher education campuses and in affiliated student accommodation facilities benefits all students and staff by reducing the risk of violence, promoting mental wellbeing, and enhancing overall engagement and productivity
- improved responses: providing better support for students and staff who experience GBV will reduce ongoing harm and improve wellbeing and educational outcomes
- prevented exposure to GBV: reducing the likelihood of GBV will protect students and staff from physical, emotional and psychological harm, ultimately leading to improved long-term wellbeing, productivity and educational outcomes.

Figure 3.2 High-level CBA framework



Note for costs: Many of these costs will involve both one off costs to create new processes as well as ongoing costs to apply those processes. To the extent that the Code increases GBV reporting and complaints these costs may increase further over time.

Note: Some impacts will be mutually reinforcing, this is considered in the modelling and/or discussed qualitatively. For example, increased awareness of reporting and support measures may empower students to be more likely to speak out or intervene in ways that reduce incidents of gender based violence.

Source: Deloitte Access Economics, 2025.

3.1.5 Break-even methodology

Break-even analysis determines the point at which the benefits of a policy or intervention equal its costs. This point, referred to as the **break-even point**, represents the minimum level of effectiveness required for the policy to yield enough benefits to be worth pursuing. Any benefit achieved beyond the break-even point generates a net positive outcome, further strengthening the case for implementation.

Breakeven analysis is particularly useful in instances when the precise impact of a program is not known or is uncertain, as in the case of the Code. This process requires the total cost of the Code and the incremental unit benefit (in this case, benefit per student or staff). If the break-even threshold is considered feasible and likely, the Code's benefits are more defensible despite uncertainty that may exist in relation to its impact (see section 3.1.3).

The Code is expected to deliver benefits across three distinct streams (refer to section 5.1) including the prevention of physical and/or sexual assault on campus, improved responses to disclosures, and enhance safety in HEPs. These benefit streams are isolated from each other in that they impact different groups of students and staff. As such, break-even analysis can be applied separately for each stream.

For each stream, the analysis calculates the minimum number of students and staff who must experience a positive impact for the Code to break even or, in other words, for the benefits of that stream to equal the costs of introducing the Code. By dividing this figure by the population of those who may experience benefits from the Code, the analysis determines the minimum required effectiveness level for each benefit stream.

The feasibility of reaching these minimum effectiveness levels is then assessed based on research and empirical evidence, where available. These benefits are then combined, given their independence, to provide a robust estimate of the minimum expected benefits of the Code.

3.2 Approach to modelling costs

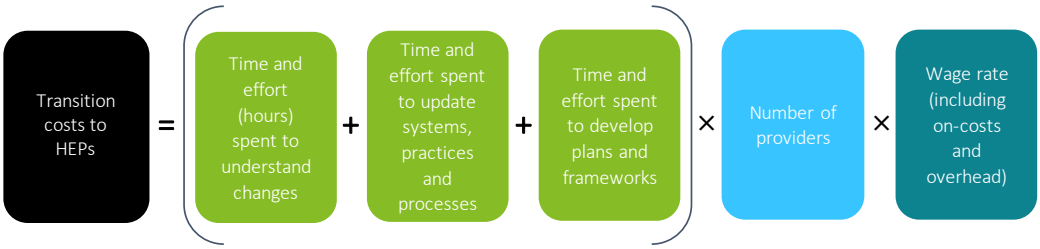
3.2.1 Costs to HEPs

This CBA estimates the following costs to HEPs based on the additional activities (incremental to the base case) they are expected to undertake by complying with the Code:

- the **transition costs** associated with understanding the Code and updating their internal systems and/or practices to accommodate any additional compliance activity required (occurring only in the first year the Code is introduced)
- the **ongoing costs** associated with complying with the Code, including conducting additional safety checks on staff, running consultations with students and staff, providing GBV training, collecting data, and reporting periodically on impacts (occurring in the first year and in the years after the Code is introduced).

To estimate the total costs to all compliant HEPs relative to the base case, the incremental costs associated with the Code were calculated by splitting the compliance activities for each standard into ongoing or transition costs. As shown in Figure 3.3 transition costs were calculated based on the product of the total number of hours spent by HEPs to complete activities required to comply with each standard under the Code, the relevant wage rate of staff (including on-costs and overhead costs), and the number of compliant HEPs.

Figure 3.3 Transition costs to HEPs



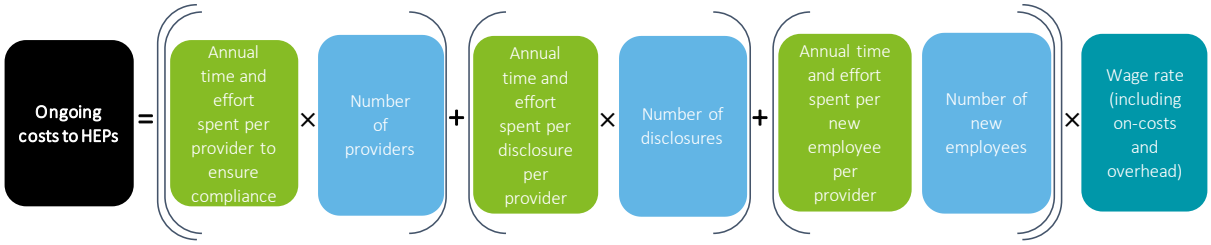
Source: Deloitte Access Economics, 2025.

Figure 3.4 illustrates how ongoing costs were calculated. Ongoing costs were first calculated at a per-cost level depending on the number of hours HEPs would be required to spend per compliance activity, per GBV disclosure, per new employee or per current employee. Each of these costs was then multiplied by the relevant wage rates (including on-costs and overhead

costs) noting that these differ based on the expertise required by the staff member to undertake these activities as specified by the Code.[185]

Estimates of ongoing compliance costs per standard were then extrapolated to obtain the economy-wide impact, based on the number of compliant HEPs, employees, new employees, disclosures and formal reports, and respondents across the sector.[186]

Figure 3.4 Ongoing costs to HEPs



Source: Deloitte Access Economics, 2025.

Desktop research informed the estimates of the current standard labour rate in the higher education sector. The wage rate in the model has been set to $100 per hour for more experienced and specialised HEPs employees, including staff who fulfill the GBV expertise requirements required by certain standards of the Code, and $55 per hour for all other HEP employees. These wage rates also represent the opportunity cost per staff member per hour of completing activities required by the Code, including to complete additional training, consultations, and background checks. These wage rates have been validated against the proposed costs of external organisations offering GBV training for employees.[187]

As outlined in section 3.1.4, this CBA accounts for variation in the level of effort taken by compliant HEPs as well as the number of staff members that would need to undertake each activity based on the size of the HEP (small, medium and large organisations). The specific assumptions made across HEPs of different sizes are outlined in Chapter 4.

3.2.2 Costs to staff

For HEPs to comply with the Code, staff will be required to undertake additional activities.[188] This will result in various **ongoing costs to staff of HEPs**. These ongoing costs represent the opportunity cost of staff time, and for this reason are ultimately borne by HEPs themselves. The direct financial cost of wages (including costs and overheads) is used as proxy for the opportunity cost of a staff member's time, as it is assumed in a competitive market factors of production are paid the value of their marginal products (i.e. if an hour of time is spent complying with regulatory requirements then the direct financial cost of wages is a proxy for the market value of the foregone economic output). For the staff of HEPs there may be broader non-market benefits that are not captured by the wage rate for example research and innovation benefits.[189] Costs to staff have been calculated based on the additional staff time required to undertake the following activities to implement the seven proposed standards:

- provide insights into the development of the prevention and response plan, the GBV prevention and response policy, and GBV education and training
- attend all required GBV education and training, including specialised disclosure training

[185] Increased reporting and therefore service utilisation may have implications for the existing workforce that currently works with people experiencing GBV. This may include specialist workforce as well as mainstream workforce such as general practitioners. There will be a need to consider these impacts and ensure the workforce is sufficiently skilled in managing the potential increased demand.

[186] A standard labour rate of $55 per hour has been used for HEP staff, based on data from the ABS and Fair Work Ombudsman on labour rates in the higher education sector. This rate reflects the wage of the broader cohort of staff in HEPs, including teaching staff. The standard labour rate was then multiplied by a factor of 1.75, as is consistent with OIA's Regulatory Burden Measurement Framework guidelines, to account for on-costs and overheads. This resulted in a scaled-up rate of $80 per hour for work-related labour costs for general staff. For HEP staff that are more experienced and/or have specialised skills in GBV (e.g. running GBV investigations and risk assessments, developing and enacting safety plans, and providing specialist services) the labour rate was scaled up to $100 per hour. This rate was multiplied by 1.75 to account for on-costs and overheads, resulting in a scaled-up rate of $175 per hour.

[187] Our Watch, 'Partnering with workplaces to end violence against women' *Our Watch* (2022) <https://www.ourwatch.org.au/>

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[188] This CBA utilised publicly available Department of Education data on the number of staff in the higher education sector. The data provided information on the number of full-time, fractional full-time, and casual staff employed in HEPs. In practice, the Code will also extend to contractors, but the number of contractors is currently unknown and has not been included in this version of the report.

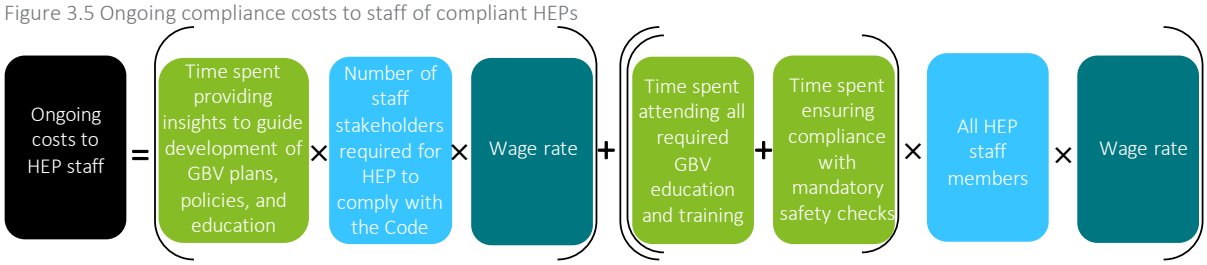
[189] In line with the Regulatory Burden Measurement Framework, opportunity costs have not been included in the regulatory burden estimate.

- ensure they comply with mandatory safety checks, including attaining a Working with Children Check, completing GBV background checks, and making declarations of any conflicts of interest.

To calculate the total costs to staff of HEPs relative to the base case, the incremental costs associated with each proposed standard were first calculated on a per worker basis. The average unit cost per staff member was based on a number of assumptions, including the number of staff required to participate in and the duration of each consultation per person, the duration of all required GBV education and training, and the time required to complete all safety checks. This includes estimating the incremental additional time spent in instances where these activities may, to some extent, already be required by some or all HEPs, for example, it is expected that some of the required safety checks will already be enforced by the HEP.

Data from the ABS and the Fair Work Ombudsman informed the model's estimates of current standard labour rates in the higher education sector. The model estimated that HEP labour rates are $100 per hour for specialised staff and $55 per hour for all other staff. These estimates were multiplied by on-costs and overheads to reach a final wage rate of $175 per hour for specialised staff and $80 per hour for all other staff. Finally, these figures were multiplied by the number of staff in compliant HEPs (see Figure 3.5).[190]

Figure 3.5 Ongoing compliance costs to staff of compliant HEPs



Source: Deloitte Access Economics, 2025.

Standards 1, 2, and 3 require HEPs to engage and collaborate with their staff to develop key action items of the Code. While the Code does not specify what proportion of staff must be engaged with, this report assumes a representative sample will be involved. For this CBA, it is assumed that 15 per cent of each HEP's staff population will participate in the first year to inform the development of each action item, and as evaluations and updates are done in future years, this proportion will reduce to 10 per cent in each subsequent year.

For the purposes of impact assessment, it is assumed that each consultation will require one hour of time per participating staff member. Engagement methods are expected to vary across providers. Some may involve a smaller number of staff in more in-depth activities, such as interviews or working groups, while others may reach more staff through quicker formats, like surveys or town halls. The one-hour estimate reflects an average across these diverse approaches. While the exact time commitment may differ by HEP and method, the overall time and effort required is expected to be broadly comparable across the sector.

3.2.1 Costs to volunteers

Under the *Work Health and Safety Act 2011*, a person is considered a worker (or staff member) of an organisation if the person carries out work in any capacity for a person conducting a business or undertaking, including work as a volunteer. As a result, for HEPs to comply with the Code, volunteers will be required to undertake additional activities.[191] This will result in various **ongoing costs to the volunteers of HEPs**. As with staff, these ongoing costs represent the opportunity cost of volunteer time, and for this reason are ultimately borne by HEPs themselves.

In the context of HEPs this report considers three types of volunteers:

[190] A standard labour rate of $55 per hour has been used for HEP staff, based on data from the ABS and Fair Work Ombudsman on labour rates in the higher education sector. This rate reflects the wage of the broader cohort of staff in HEPs, including teaching staff. The standard labour rate was then multiplied by a factor of 1.75, as is consistent with OIA's Regulatory Burden Measurement Framework guidelines, to account for on-costs and overheads. This resulted in a scaled-up rate of $80 per hour for work-related labour costs for general staff. For HEP staff that are more experienced and/or have specialised skills in GBV (e.g. running GBV investigations and risk assessments, developing and enacting safety plans, and providing specialist services) the labour rate was scaled up to $100 per hour. This rate was multiplied by 1.75 to account for on-costs and overheads, resulting in a scaled-up rate of $175 per hour.

[191] This CBA utilised publicly available Department of Education data on the number of staff in the higher education sector. The data provided information on the number of full-time, fractional full-time, and casual staff employed in HEPs. In practice, the Code will also extend to contractors, but the number of contractors is currently unknown and has not been included in this version of the report.

- **community volunteers**: individuals who engage in unpaid volunteering activities or services for a HEP without being enrolled as students at that institution
- **student volunteers**: enrolled students who engage in unpaid volunteering activities or services for their HEP
- **staff volunteers**: staff members who engage in unpaid volunteering activities or services for the HEP that employs them.

As staff members, volunteers must comply with all requirements for staff in the Code, including completing the necessary background checks and GBV prevention and response training. Student volunteers, who in this capacity as both staff and students, will need to comply with all requirements for staff and students. However, given this duplicated role, some of the costs linked to student volunteers will already be captured under costs to students, reducing the overall reported cost to student volunteers. Similarly, the costs to staff volunteers, who are both employed by and perform unpaid volunteer roles for a HEP, will be captured in costs to staff because it is expected that these individuals will have already complied with their obligations as part of their employment. As a result, costs to staff volunteers are not captured in this report and costs to student volunteers are only considered where the requirement is not already required of students generally.

Costs to all three types of volunteers have been calculated based on the additional time required to undertake the following activities to implement the seven proposed standards:

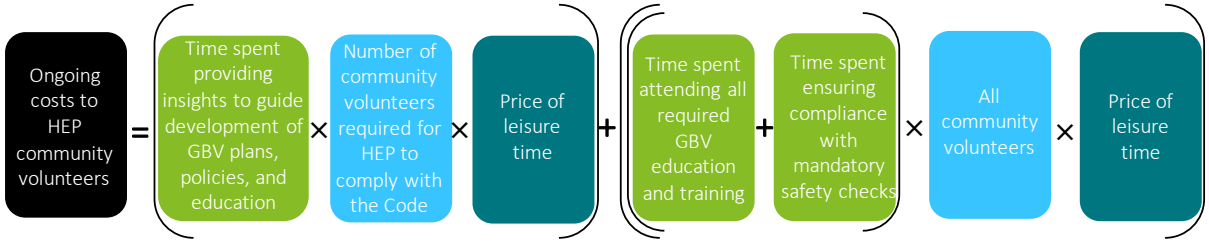
- provide insights into the development of the prevention and response plan, the GBV prevention and response policy, and GBV education and training (only for community volunteers as it is assumed that student volunteers' views are already captured when students and staff will participate in consultations)
- attend all required GBV education and training, including specialised disclosure training
- ensure they comply with mandatory safety checks, including attaining a Working with Children Check, completing GBV background checks, and making declarations of any conflicts of interest.

To calculate the total costs to volunteers of HEPs relative to the base case, the incremental costs associated with each proposed standard were first calculated on a per volunteer basis. The average unit cost per volunteer was based on a number of assumptions, including the duration of all required GBV education and training, and the time required to complete all safety checks. This includes estimating the incremental additional time spent in instances where these activities may, to some extent, already be required by some or all HEPs, for example, student volunteers will have already complied with certain obligations as part of their enrolment.

For student volunteers, it is assumed that a higher level of training and checks will be required than would typically apply to them as students. This reflects the expectation that, when acting in a volunteer role, they are considered part of the staff cohort and therefore must undertake additional activities beyond those required of students. For example, a student volunteer may be required to undertake more specialised GBV training, declare a conflict of interest or obtain a Working with Children Check. To quantify the incremental cost for student volunteers, the opportunity cost of their time spent in training was calculated by subtracting the general opportunity cost for students from the equivalent cost for staff. This ensures that only the additional cost incurred in their capacity as a volunteer (rather than as a student) is captured.

While volunteers are considered staff, because their roles are unpaid their opportunity cost associated with completing compliance activities is calculated using a value of their leisure time, estimated to be $37 per hour.[192] The overall ongoing cost calculation methods used for community and student volunteers are outlined below in Figure 3.6 and Figure 3.7, respectively.

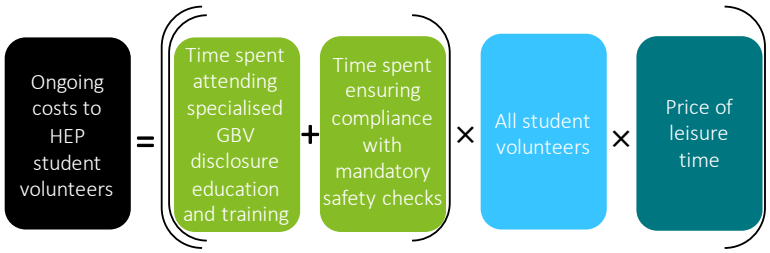
Figure 3.6 Ongoing compliance costs to community volunteers of compliant HEPs



Source: Deloitte Access Economics, 2025.

[192] The value of leisure time per hour is based on best-practice guidance published by the Office of Best Practice Regulation (2024), see the following guidance note: https://oia.pmc.gov.au/sites/default/files/2024-02/regulatory-burden-measurement-framework.pdf.

Figure 3.7 Ongoing compliance costs to student volunteers of compliant HEPs



Source: Deloitte Access Economics, 2025.

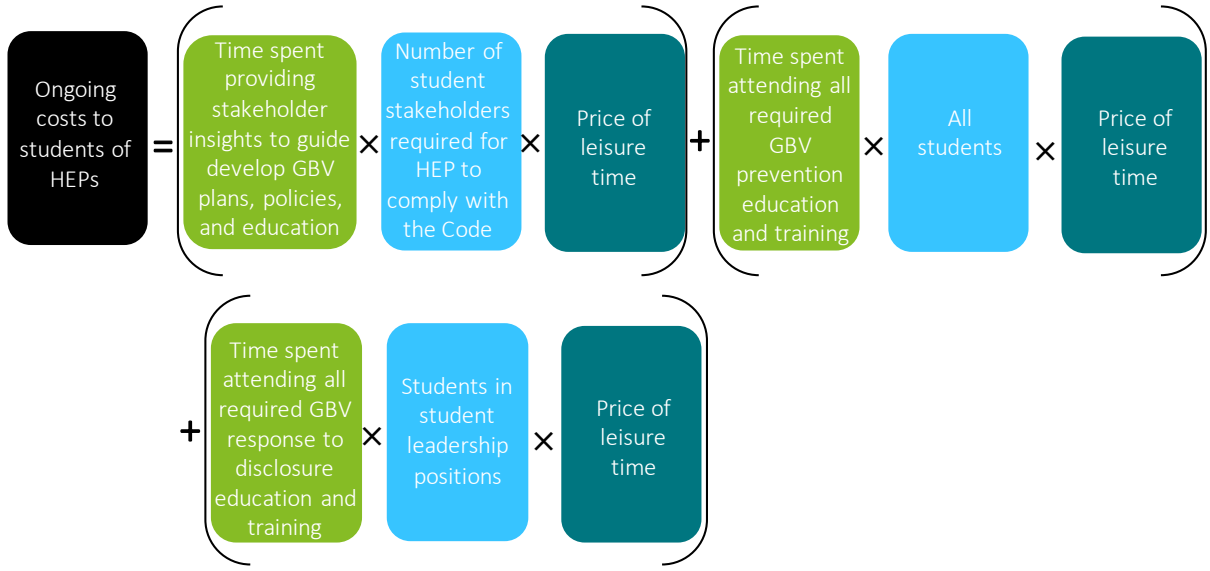
3.2.2 Costs to students

This CBA also calculates the **ongoing costs to students of HEPs** associated with the introduction of the Code and implementing the seven standards. Costs to students have been calculated based on the additional time required to undertake the following activities required for HEPs to comply with the standards of the Code:

- provide insights into the development of the prevention and response plan, the GBV prevention and response policy, and GBV education and training
- for all students to attend education and training on GBV prevention
- for students in student leadership positions to attend specialised disclosure training.

Similarly to staff costs, the costs to students of HEPs associated with introducing the Code were first calculated on a per student basis. The average unit cost per student was based on a number of assumptions, including the number of students required to participate in and the duration of each consultation per person, the duration of all required GBV education and training, and the average number of students in leadership positions across small, medium, and large HEPs (excluding students who are employed by the HEP). To obtain these costs in monetary terms, these estimates were multiplied by the value of leisure time of $37 per hour and the number of students in compliant HEPs (see Figure 3.8).[193]

Figure 3.8 Ongoing costs to students of compliant HEPs



Source: Deloitte Access Economics, 2025.

Where HEPs are required to engage and collaborate with students to develop key action items of the Code, it is assumed that 2 per cent of each HEP's student population will participate in the first year to inform the development of each action item, and as evaluations and updates are done in future years this proportion will reduce to 1 per cent. The lower assumed proportion of students involved in consultations compared to staff members reflects that student populations are

[193] The value of leisure time per hour is based on best-practice guidance published by the Office of Best Practice Regulation (2024), see the following guidance note: https://oia.pmc.gov.au/sites/default/files/2024-02/regulatory-burden-measurement-framework.pdf.

significantly larger. Each consultation is expected to require 30 minutes of time per participating student, for example, to complete a survey or participate in a short interview.

As with staff (and given that the Code does not provide specific guidance on the proportion, duration, and style of consultations) it is assumed that there will be variation in approaches across HEPs. For instance, some HEPs may consult a smaller number of students more intensively (e.g. via in-depth interviews or workshops) while others may consult a larger number of students through shorter, lower-burden methods such as surveys. The approach taken in the CBA reflects this balance. Although, the time per student may be lower in some cases, it is offset by higher volumes (and vice versa). This approach is intended to provide a reasonable average of the total time and effort required across HEPS, acknowledging that the consultation methods and scope will vary.

3.2.3 Costs to the Australian Government

To estimate the total cost to the Australian Government of introducing the Code, Deloitte Access Economics was provided information from the Department regarding total staff costs (including overheads and oncosts), specifically the salaries and number of FTEs (at levels APS4-6, EL1-2 and SES-1) that will be required to administer, enforce, and provide training services (including upskilling existing staff) for the Code. As labour costs have been treated as ongoing in the modelling, and the Department provided costs up to 2027-28, labour costs have been assumed to grow by a real wages growth rate of 3 per cent per annum from 2027-28 onwards.[194] Additionally, the Department provided information on IT or system upgrades, as well as education and communication activities, which have been incorporated into the model as transition or ongoing costs, depending on when the costs are expected to be incurred.

3.2.4 Calculating total cumulative costs

To provide illustrative estimates of the total cumulative cost impacts imposed by the Code, the CBA model estimates per-HEP, per-student, and per-staff member costs and then extrapolates the incremental unit costs based on the total number of impacted stakeholders. This process also considers other factors that may influence the total cumulative costs such as the volume of exposure to GBV, the extent of underreporting, and the rate of HEP compliance with the Code.

To provide an illustrative estimate of the cumulative costs to all HEPs across the sector associated with each standard, this report considers the cost to HEPs by size of the organisation. Specifically, this report considers small, medium, and large HEPs. Within the small, medium, and large HEP groupings there are likely to be variations in the incurred costs per provider. For example, the average cost per HEP within a grouping could be overstating the costs for some HEPs and understating the costs for other HEPs. Despite this variation, the average cost still serves as useful based for sector-wide analysis of costs and benefits.[195]

Data provided by the Department of Education indicates that there are approximately 1.6 million students studying in the higher education sector. Based on this total, this report uses the following definitions to differentiate between the size of HEPs:

- Small: student population of HEP makes up less than 1 per cent of the overall Australian higher education student population (approximately 146,552 students)
- Medium: student population of HEP makes up between 1-2 per cent of the overall Australian higher education student population (approximately 631,062 students)
- Large: student population of HEP makes up 3 per cent or more of the overall Australian higher education student population (approximately 822,949 students).

Based on the TEQSA National Register of Higher Education Providers and Courses, this report estimates that there is a total of 211 HEPs in Australia. Using the above definitions, it is estimated that 14 are large HEPs, 25 are medium, and 172 are small. This report assumes that there will be no growth in the number of HEPs in Australia over the ten-year scope of this CBA. To account for student growth over time, this report has adopted a conservative average estimate of 2.5 per cent per year per HEP, based on historical growth rates. Given this CBA uses a conservative estimate of student population growth at the lower end of historical data, the benefits presented in this report are likely to be lower than what could be the full impact of the Code.

In terms of the number of staff, based on data from the Workplace Gender Equality Agency, it was estimated that there are a total of 259,865 staff employed by the higher education sector. By applying the definitions of the size of HEPs, it is

[194] Wage growth has been informed by Deloitte Access Economics macroeconomic forecasting of economic trends including wages as a part of the Business Outlook publication.
[195] To differentiate between small, medium, and large HEPs, this report has adopted definitions based on the total student population of each HEP. This also reflects an assumption that the number of staff per HEP is likely to scale based on the number of students.

estimated that 136,717 are employed by large HEPs, 95,934 by medium, and 27,214 by small. To account for employee growth over time, this report has adopted an average estimate of 3 per cent employee growth per year per HEP.

Given some standards of the Code make requirements for new employees of a HEP, for example, Standard 4, this report has also estimated the number of new hires per year per HEP. To estimate this figure, this report has assumed that 5 per cent of all employees are new employees. As a result, it is estimated that of the total 259,865 staff members, 12,993 are new employees. Across the different sizes of HEPs, this equates to 4,102 new employees hired by large HEPs, 1919 by medium, and 408 by small.

A key assumption of this model affecting HEP costs is the compliance rate with the Code. The report anticipates that not all HEPs will initially be compliant with every standard of the Code; however, compliance is expected to rise over time as sector understanding improves and best-practice guidance is established and shared. This CBA also assumes that larger HEPs will have higher compliance rates due to having more resources and staff to support the transition. Specifically, in the first year, compliance rates are estimated to be: 60 per cent of large HEPs, 40 per cent of medium, and 30 per cent of small. Compliance is projected to increase by about 10 per cent annually thereafter. After five years, large HEPs are expected to reach 100 per cent compliance, while medium and small HEPs are expected to plateau at around 77 per cent and 69 per cent, respectively.[196] This is to reflect that full compliance may never be reached across all medium and small HEPs due to resource limitations. This assumption impacts both the scale of costs and benefits as impacts are only felt by those HEPs, and their students and staff, who comply with the requirements under the Code. A sensitivity analysis has been performed to demonstrate the result if small and medium size HEPs were also to reach 100 per cent compliance.

An additional key assumption of this model is that it only considers GBV experienced by university students and staff who identify as female (female students and staff). While people of all genders experience GBV, it is a term most often used to describe violence against women, because most GBV is perpetrated by men against women.[197] Further, most prevalence studies on GBV, including the ABS's Personal Safety Surveys, focus on women.[198] While male students and staff also experience GBV, research suggests that they experience significantly lower rates of GBV than women.[199] As a result, applying female prevalence rates to men would likely overstate their actual experiences of GBV. To calculate the in-scope population, 50 per cent of staff and 60 per cent of students at Australian HEPs are assumed to identify as female.[200,201]

The total costs to HEPs will also be influenced by the number of students and staff making disclosures or formal reports of GBV per HEP. To estimate the number of disclosures or formal reports per HEP, this report has assumed an incidence rate of 20 per cent of students and staff who identify as female based on desktop research of key reports into the prevalence of GBV in Australia. Estimations based on the prevalence of various forms of GBV (including domestic and family violence, stalking, coercion, intimate partner violence, and online bullying) and the potential increase in formal reports or disclosures of GBV following the introduction of the Code were informed using surveys undertaken in HEP settings, ABS statistics, reports from the Australian Institute of Health and Welfare, literature reviews and Australian Government Research. Specifically, prevalence figures reported in the 2021 NSSS, the Department of the Prime Minister and Cabinet's 2024 *Unlocking the Prevention Potential: accelerating action to end domestic, family and sexual violence* report and the National Tertiary Education Union's 2023 *Sexual Harassment in the workplace* study were also used alongside data from the ABS's most recent Personal Safety Survey, as shown in Table 3.2.

Given that there are many forms of GBV and that women who experience GBV often experience multiple forms of violence from a perpetrator, to avoid double counting, the model has taken a conservative approach and assumed an average of 20

[196] It was necessary to recognise the reality that HEPs may require some time to change their current practices with best practice, and that due to resource constraints some HEPs may never reach full compliance. In the absence of robust data on compliance rates, assumptions based on the results of a Productivity Commission survey which set out the extent to which businesses were aware of their OHS requirements as a proxy for compliance. These assume that long-run compliance will be 100 per cent for large employers, 77 per cent for medium-sized employers and 69 per cent for small employers. The model assumes that compliance rates converge on these long-run rates over five years at ten percentage points per year.

[197] Australian Government Department of Education, *Proposed National Higher Education Code to Prevent and Respond to Gender-based Violence 2025* (2025) <https://www.education.gov.au/action-plan-addressing-genderbased-violence-higher-education/resources/proposed-national-higher-education-code-prevent-and-respond-genderbased-violence-2025>

[198] Australian Bureau of Statistics, *Personal Safety, Australia* (2023) <https://www.abs.gov.au/statistics/people/crime-and-justice/personal-safety-australia/latest-release>

[199] Australian Government Department of Social Service, *The National Plan to End Violence against Women and Children 2022-2032* (2022) <https://www.dss.gov.au/system/files/resources/national-plan-end-violence-against-women-and-children-2022-2032.pdf>

[200] Hamilton,M, et al, ''Gender inclusive practices and work-life balance in Australian Universities' (2022) *The University of Sydney* <https://universitiesaustralia.edu.au/wp-content/uploads/2023/03/Gender-inclusive-practices-and-work-life-balance-in-Australian-universities_Dec-2022.pdf>

[201] Australian Government Workplace Gender Equality Agency, *Higher education enrolments and graduate labour market statistics* (2019) <https://www.wgea.gov.au/sites/default/files/documents/august_2019_grad_factsheet_0.pdf>

per cent of female HEP students and staff are affected inside or outside a HEP setting.[202, 203] This broadly aligns with figures reported in other research.

Table 3.2 Personal safety data for women sourced from the ABS

GBV	Incidence in the last 12 months
Sexual violence	1.9 per cent
Intimate partner violence	1.5 per cent
Cohabitant partner violence	0.9 per cent
Cohabitant partner emotional abuse	23.0 per cent
Sexual harassment	12.6 per cent
Stalking	3.0 per cent
Total sum of incidence	**43.3 per cent**

Source: ABS, Personal Safety Data (2023).

Of those affected by GBV, it is further assumed that 3 per cent of students and staff who identify as female and are exposed to GBV will seek support from or make a disclosure or formal report to their HEP. This base case figure is estimated based on the figures presented in the 2021 NSSS.[204]

The rate of disclosures and formal reports is expected to increase over time as the benefits of the Code begin to be realised and compliance rates increase. However, the impact of the Code on future rates of reporting to HEPs is difficult to predict. As such, estimations are based on similar measures that have been put in place and the subsequent impacts. For example, an audit of the implementation of the *Code of Practice for the Investigation of Family Violence* introduced into Victoria Police, which specified mandatory police responses as well as new investigation guidelines, found the number of family violence incident reports rose by over 14 per cent in four years.[205] Another literature review suggests that trauma-informed supports can increase reporting of traumatic incidents by up to 30 per cent.[206] However, this includes all types of psychological trauma, not just gender-based violence. This analysis models a conservative increase of 15 per cent in disclosures and formal reports from a base case of 3 per cent following the Code's implementation.[207] Specifically, it is assumed that the rate of disclosures will remain steady at 3 per cent, and then begin increasing by 2 per cent each year from year four, eventually plateauing at about 15 per cent.

[202] National Tertiary Education Union, 'Sexual Harassment in the Workplace', *National Tertiary Education Union* (2023) <https://www.nteu.au/News_Articles/Media_Releases/Sexual_Harassment_Survey_Report.aspx#:~:text=%22Higher%20education%20staff%20are%20being,38%25%20reporting%20personal%20experiences%20ofharassment >
[203] Rapid Review Expert Panel, 'Unlocking the Prevention Potential: Accelerating action to end domestic, family and sexual violence', *Australian Government Department of the Prime Minister and Cabinet* (2024) <https://www.pmc.gov.au/sites/default/files/resource/download/unlocking-the-prevention-potential-4.pdf>
[204] Social Research Centre (SRC), 'National Student Safety Survey', *National Student Survey* (2022) <https://www.nsss.edu.au/results>
[205] Victorian Auditor-General's Report, *Implementing Victoria Police's Code of Practice for the Investigation of Family Violence* (2009) <https://www.audit.vic.gov.au/sites/default/files/20090610-family-violence-full-report.pdf#:~:text=The%20Code%20specifies%20a%20mandatory%20police%20response%20to,prosecutions%3B%20and%20breaking%20the%20cycle%20of%20family%20violence>.
[206] Brian Chin et al, 'Evaluating the Effectiveness of Trauma-Informed Care Frameworks in Provider Education and the Care of Traumatized Patients' (2024) 296 *Journal of Surgical Research* 621.
[207] Australia Government Australian Institute of Criminology, 'AIC reports Research Report 12 Policing domestic violence: A review of evidence' (2018) <https://www.aic.gov.au/sites/default/files/2020-05/rr_policing_domestic_violence_211118.pdf>.

3.3 Approach to modelling benefits

As a result of HEPs adapting their practices or processes in response to the Code, it is expected that they will provide an environment that is safer for students to study and staff to work, by:

- improving the culture of safety and respect within HEPs, whereby all students and staff benefit.
- providing more timely responses and access to appropriate support services where exposure to GBV still occurs.
- preventing exposure to GBV and avoiding all associated harms.

The Code may also streamline processes by more clearly articulating expectations of HEPs. While the introduction of the Code will impose a regulatory burden on HEPs, staff, and students both initially and on an ongoing basis, as outlined in the consideration of costs above, the streamlining of processes can create a reduction in regulatory burden.

3.3.1 Improved safety to all female students and staff in HEPs

The Code aims to improve the safety culture within HEPs more broadly by improving accountability and transparency in leadership. Current literature affirms the importance of culture and leadership in improving psychological safety in the workplace. In particular, research shows that psychosocial hazards can be influenced by macro-level factors such as the psychosocial safety climate (PSC) within the workplace. PSC is a theoretical framework used to measure workers' workplace safety experience of policies, practices, and procedures for the protection of worker mental health and safety (see Figure 3.9 below).

Figure 3.9 The Psychosocial Safety Climate framework

Psychosocial Safety Climate

PSC is a theoretical framework that underpins the Australian Workplace Barometer (AWB) report.[208]

The PSC-12 is a survey instrument used to measure workers' workplace safety experience of "policies, practices and procedures for the protection of worker mental health and safety".[209] Here, practices refer to workplace culture and perceptions of an enacted commitment to, or prioritisation of, mental health and safety in a workplace. In the AWB report, Safe Work Australia proposes that the most efficient organisational intervention target to reduce the impact of psychosocial hazards is to build PSC, and literature on mental health and workplace safety confirms the relationship between PSC survey scores and prevalence of mental injury.[210, 211, 212]

The survey instrument has scores ranging from 12 to 60 and comprises 12 questions, three for each of the following four subscales:

Management commitment e.g. "Senior management considers employee mental health to be as important as productivity"
Management priority e.g. "Senior management clearly considers the mental health of employees to be of great importance"
Organisational communication e.g. "There is good communication here about mental safety issues that affect me"
Organisational participation e.g. "Employees are encouraged to become involved in mental safety and health matters"

Each subscale comprises of three questions measured using a 5-point Likert scale 1 (strongly disagree) to 5 (strongly agree) that includes a midpoint (neither disagree nor agree). The table below shows the benchmarks that have been empirically determined to show risk levels and prognosis for PSC scores.

PSC Risk level	Range 12-60	Prognosis
Low risk (High score)	≥41	Performing well, improvement in PSC levels may be reflected in positive appraisals of leader performance in PSC.

[208] Dollard, M, et al, 'The Australian Workplace Barometer: Report on Psychosocial Safety Climate and Worker Health in Australia' (2012) *Safe Work Australia, University of South Australia*
[209] Hall, G et al., 'Psychosocial Safety Climate: Development of the PSC-12' (2010) 17(4) *International Journal of Stress Management* 353.
[210] Dollard, M, et al., *Psychosocial Safety Climate A New Work Stress Theory: A New Work Stress Theory* (Cham: Springer International Publishing, 2019)
[211] Idris, M, et al., 'Psychosocial safety climate: Conceptual distinctiveness and effect on job demands and worker psychological health.' (2012) 50 (1) *Safety Science* 19.
[212] Zadow, A, et al., 'Psychosocial safety climate, emotional exhaustion, and work injuries in healthcare workplaces' (2017) 33 (5) *Stress and Health* 558.

Medium risk (Moderate score)	41< and >37	Steady state, improvement in PSC levels may lead to improvements in mental health, however injuries are not expected.
High risk (Low score)	37≤ and >26	Increasing PSC levels from a low score (high risk) to medium could reduce depression by 16 per cent and job strain by 14 per cent.
Very high risk (Very low score)	≤26	Urgent action is required to prevent further dramatic increases in depressive periods, worsening conditions.

Source: Deloitte Access Economics, 2025, adapted from Hall G, Dollard M & Coward J 'Psychosocial Safety Climate: Development of the PSC-12' 17 *International Journal of Stress Management* (2010) 353 <doi.org/10.1037/a0021320>.

PSC was used in this CBA to measure incremental improvements in the level of psychological risk within higher education providers as a result of the Code, and the flow on benefits to students and staff. To determine the flow-on benefits associated with improvements in PSC, a number of assumptions were made in this analysis regarding the degree of impact associated with improving a HEPs' PSC rating. This was a conservative approach to estimating benefits by assuming that the proposed reforms are unlikely to eliminate GBV, but instead lessen the degree of risk present. For the purpose of this analysis, and based on current prevalence rates, it is assumed that all HEPs are classified as high-risk.

This analysis assumes that the Code would be expected to improve a HEP's PSC subscales and corresponding PSC rating through:

- improvements in students' and staff's perceptions of management commitment to, and prioritisation of, psychological health, and
- improvements in the level of communication and collaboration with students and staff on matters relating to psychological health and safety.[213]

A key assumption of this benefits calculation is that it only considers the benefits of improved safety to students and staff who identify as female (female students and staff). While people of all genders experience GBV, it is a term most often used to describe violence against women, because most GBV is perpetrated by men against women.[214] Further, most prevalence studies on GBV, including the ABS's Personal Safety Surveys, focus on women.[215] It is acknowledged that research indicates that transgender, non-binary and gender diverse people also face a disproportionate risk of experiencing GBV in their lifetime.[216] However, as discussed in section 3.1.2.1, the lack of comprehensive data on the number of students and staff who identify as transgender, non-binary and/or gender diverse and how GBV impacts this cohort over their lifetimes, limits the ability for this CBA to estimate the impact of the Code on this cohort. As a result, this CBA has taken a conservative approach to estimate the scale of benefits of the Code for victim-survivors, considering only the impact on students and staff who identify as female.

3.3.1.2 Wellbeing benefits to students and staff with existing mental health conditions

This CBA assumed that wellbeing benefits would be felt by those female students and staff who avoid the disability associated with psychological injuries and illnesses that may be exacerbated by unsafe work and learning environments, regardless of whether these individuals are exposed to GBV. This is based on the logic that those with existing mental health conditions may be at most risk of harm from working or studying within an environment where there is a high risk of GBV.

This wellbeing benefit is only applied to female students and staff due to the disproportionately higher rates of women compared to men who are impacted by GBV.[217] This disproportionate risk creates an additional psychological burden of fear

[213] Becher, A, et al, 'Psychosocial Safety Climate and Better Productivity in Australian Workplaces' (2016) *Safe Work Australia* <https://www.safeworkaustralia.gov.au/system/files/documents/1705/psychosocial-safety-climate-and-better-productivity-in-australian-workplaces-nov-2016.pdf>

[214] Australian Government Department of Education, *Proposed National Higher Education Code to Prevent and Respond to Gender-based Violence 2025* (2025) <https://www.education.gov.au/action-plan-addressing-genderbased-violence-higher-education/resources/proposed-national-higher-education-code-prevent-and-respond-genderbased-violence-2025>

[215] Australian Bureau of Statistics, *Personal Safety, Australia* (2023) <https://www.abs.gov.au/statistics/people/crime-and-justice/personal-safety-australia/latest-release>

[216] Hill, A, et al, 'Private Lives 3: The health and wellbeing of LGBTIQ people in Australia'. (2020) *La Trobe University Australian Research Centre in Sex, Health and Society <https://www.latrobe.edu.au/__data/assets/pdf_file/0009/1185885/Private-Lives-3.pdf> y*

[217] Australian Institute of Health and Welfare, *Family domestic and sexual violence survey* (2024) <https://www.aihw.gov.au/family-domestic-and-sexual-violence/responses-and-outcomes/how-do-people-respond-to-fdsv

and stress among women compared to men.[218] As a result, the scale of benefits associated with studying and/or working in an environment that better prevents and responds to GBV is expected to be notably higher for women than for men.

Data for Australians aged 15-49 was used as the best available approximation for the age group captured by our model (working age population). Estimates for 'all mental disorders' (which includes substance abuse, depressive and anxiety disorders) have been used. The GBD study estimates that mental disorders result in 397,231 YLDs and 229 YLLs, affecting approximately 35 per cent of Australians. This equates to 0.15 DALYS per person with a mental disorder per year. Applying the VSLY (see Figure 3.9 above) the wellbeing cost of having a mental health condition is approximately $53,000 annually per person.

The most recent AWB report determined that a 10 per cent increase in PSC is expected to lead to a 3 per cent decrease in psychological health problems.[219] This was used to determine the improvement in overall psychological health outcomes to workers as a result of reductions in their workplace's PSC rating. This translates to avoided disability costs of approximately $11,000 per worker with a mental health condition who moves from a high-risk workplace to a medium-risk workplace.

This reduced risk was applied to the wellbeing cost outlined in the burden of disease methodology, to estimate the total benefit for the total population who would benefit from avoided harm (the quantity of workers with mental health conditions who would be employed within safer workplaces relative to the base case).

The total value of avoided exacerbation of psychological injuries and illnesses from unsafe work and learning environments is therefore calculated by multiplying the $53,000 unit cost by the number of female students and staff with existing mental health conditions. The number of female students and staff with existing mental health conditions is calculated using data from the ABS, which estimates that 30 per cent of Australians aged 15 to 49 have a mental disorder of some kind. This proportion is applied to the annual number of students and staff in universities not currently compliant under the base case to find the number with existing mental health conditions.

3.3.1.3 Productivity improvements to all female students and staff as a result of a safer environment

Research on the PSC indicates that there are productivity benefits to all staff that move to safer PSC work environments.[220] This literature determined that the average annual cost of absenteeism per person employed in a workplace with a high-risk PSC rating (compared to a medium-risk PSC rating) is $42.[221] This same research estimates that the average cost of presenteeism per person employed in a workplace with a high-risk PSC rating (compared to a medium-risk PSC rating) is $71.

Therefore, improvements in work outcomes (a reduction in absenteeism and presenteeism) would be expected to be felt economy-wide in the form of productivity gains. These productivity gains are associated with providing both students and staff with an environment that is more psychologically safe. These parameters were used in the benefits model for psychosocial hazards, psychological injury, and illness as the best available estimates of the benefits in terms of improved PSC in workplaces.

As above, the degree to which this benefit would be realised is dependent on the effectiveness of the Code in reducing the level of risk in HEPs. To be conservative, this analysis determines how effective the Code would need to be in reducing psychosocial risk in HEPs across Australia to allow the costs of the Code to break even with the benefits.

The total value of avoided productivity losses from an unsafe learning and working environment can be found by multiplying the unit cost of $113 by the number of female students and staff at universities not currently compliant with the Code in the base case.

3.3.2 Improved responses to disclosure of GBV

By improving institutions' responses to disclosures and formal reports of GBV, victims of GBV will have more timely access to appropriate support services that can reduce the harm they experience. This is relative to the base case, where responses may be slower or less effective. These benefits are measured on an annual basis, as opposed to the lifetime benefits associated with prevention, as they reflect incremental improvements in ongoing wellbeing during the ten-year analysis

[218] Jacobsen, S, '"More of a Girl Thing?" Examining the Role of Gender and Campus Context in Perceptions of Risk and the Shadow of Sexual Assault.' (2022) 37 (15-16) *Journal of interpersonal violence*, NP13468-NP13496.
[219] Dollard, M, et al, 'The Australian Workplace Barometer: Report on Psychosocial Safety Climate and Worker Health in Australia' (2012) *Safe Work Australia, University of South Australia* <https://www.safeworkaustralia.gov.au/system/files/documents/1702/the-au>stralian-workplace-barometer-report.pdf
[220] Becher, H et al. 'Psychosocial Safety Climate and Better Productivity in Australian Workplaces.' (2016) *Safe Work Australia, University of South Australia* <https://www.safeworkaustralia.gov.au/system/files/documents/1705/psychosocial-safety-climate-and-better-productivity-in-australian-workplaces-nov-2016.pdf>
[221] Ibid.

period. To be conservative, the analysis only measures the reduction in harm to the discloser in the first year that they make the disclosure. This is to reflect that the benefits in the first year, soon after the exposure has occurred, are likely to be the largest. To this degree, actual benefits may be larger than those estimated in this analysis, given that these benefits would likely continue at a decreasing rate over time.

Based on the method outlined in this section, each disclosure of GBV is associated with a potential yearly cost (in terms of wellbeing, productivity, education attainment and other costs) of $57,000 if the individual is a student, and $158,000 if the individual is a staff member. The higher benefits for students reflect greater reductions in harm as a result of improved education outcomes, assuming staff have already attained their relevant qualifications.

As above, based on the total potential harm to one person (either staff or student), this CBA calculates the required effectiveness of the Code in improving response to GBV (and the corresponding reduction in ongoing harm to that individual) in the event of a disclosure for the costs and benefits of the Code to break even, even if the only impact of the Code was to improve responses. This represents the minimum level of improvement required for the Code to be considered worthwhile based on the improvement of responses to disclosures and formal reports of GBV alone.

3.3.2.1 Yearly impacts on health and wellbeing

Previous work by Deloitte on the economic costs of sexual harassment in the workplace estimates that the reduction in wellbeing due to each case of sexual harassment is estimated at $6,106 per year on a per person basis (adjusted to 2024 dollars), based on the prevalence of workplace sexual harassment reported in the Australian Human Rights Commission's *2018 Fourth national survey on sexual harassment in Australian workplaces*.[222] This figure represents the loss of quality of life, which can be measured using disability-adjusted life years (DALYs) and monetised using the value of a statistical life year. A description of the Burden of Disease methodology taken to quantify these benefits is summarised in Figure 3.10 below.

Due to limitations in the available evidence, the modelled loss of wellbeing was limited to survivors of actual or attempted sexual assault only. Victims of other types of GBV will also experience a loss of wellbeing, but due to the cross-sectional nature of existing data, it is not possible to include wellbeing costs for more subtle or covert forms of GBV. This approach assumes that the estimated wellbeing benefits apply to both students and staff exposed to GBV.

Figure 3.10 Burden of disease methodology

Burden of disease methodology

The burden of disease methodology was developed by the World Health Organization (WHO) and is a comprehensive measure of mortality and disability from conditions for populations around the world. The burden of disease methodology is a non-financial approach, where life and health can be measured in terms of disability-adjusted life years (DALYs). Disability weights are assigned to various health states, where zero represents a year of perfect health and one represents death. Other health states are given a weight between zero and one to reflect the quality of life that is lost due to a particular condition.

For example, a disability weight of 0.2 is interpreted as a 20 per cent loss in the quality of life relative to perfect health for the duration of the condition. DALYs are composed of premature mortality (years of life lost due to premature death – YLL) and morbidity (years of healthy life lost due to disability – YLD) components:

DALYs=YLLs+YLDs

The burden of disease as measured in DALYs can be converted into a dollar figure using an estimate of the value of a statistical life (VSL). The VSL is an estimate of the value society places on an anonymous life. The Australian Safety and Compensation Council estimate of the 'net' VSLY (that is, subtracting financial costs borne by individuals) is approximately $410,000 inflated to 2024-25 dollars.[223]

Estimates of the years of healthy life lost to disability are sourced from the 2019 Global Burden of Disease (GBD) study, conducted by the Institute for Health Metrics and Evaluation (IHME) at the University of Washington.[i] The GBD study provides a standardised analytical approach for estimating prevalence and YLDs by age, sex, cause, year, and location.

[222] Deloitte Access Economics, *The economic costs of sexual harassment in the workplace* (report for the Sexual Harassment National Inquiry, March 2019) <https://www.deloitte.com/content/dam/assets-zone1/au/en/docs/services/economics/deloitte-au-economic-costs-sexual-harassment-workplace-240320.pdf>

[223] Deloitte analysis and adjustment for CPI of a meta-analysis of VSL estimates, including Abelson (2007), which forms the basis for the Commonwealth's Office of Impact Analysis' guidance note on VSLY, Australian Safety and Compensation Council.

Data for Australians aged 15-49 has been used as the best approximation for the age group captured by our model (working age population).

Source: Deloitte Access Economics, 2025.

The total value of avoided harm from exposure to GBV is calculated by multiplying the unit cost of productivity losses by the number of students and staff affected by GBV on or off campus each year who seek help for it.

The number of female students and staff affected by GBV on or off campus each year who seek help for it is calculated using results from the 2021 NSSS, which found that 3 per cent of university students and staff who experienced GBV sought support or assistance.[224] This proportion was applied to the number of students and staff at universities not currently compliant with the Code in the base case who are affected by GBV, both on and off campus. Given a student or staff may disclose a case of GBV regardless of whether it occurs on campus or not, the broader societal rate of GBV at 20 per cent was used to determine the incidence of GBV (see section 3.2.4).

3.3.2.2 Avoided yearly productivity losses

Improving the response of institutions to disclosures and formal reports of GBV is also expected to reduce the negative impacts of GBV on productivity, including absenteeism, presenteeism, staff turnover and manager time. Productivity costs reduce gross domestic product as they disrupt production from its normal level, reducing a society's overall ability to produce goods and services. Previous work undertaken by Deloitte Access Economics to measure the economic cost of sexual harassment valued lost productivity at $1,289 per person each year (adjusted to 2024 dollars).[225] This work suggests that victims of sexual violence experience absenteeism averaging 0.8 days per year and presenteeism that results in a 3.2 per cent productivity reduction. Increased turnover costs arise as 10 per cent of individuals exposed to sexual violence leave the organisation. Manager time spent addressing complaints also leads to productivity losses equal to the opportunity cost of their time.

The unit cost of $1,289 was multiplied by the number of students and staff affected by GBV on or off campus each year who seek help, estimated using the method outlined in section 3.3, to find the total value of avoided productivity losses from exposure to GBV each year.

For staff only, there are also avoided costs to the economy where improved institutional responses to GBV reduce the amount of time staff are absent from work. It is assumed that individuals who disclose GBV may take, on average, 10 working days (equivalent to two weeks) of leave per year due to its impacts. This assumption aligns with family and domestic violence (FDV) leave entitlements endorsed by the Fair Work Ombudsman.[226]

This CBA estimates the economic benefit to HEPs and to the broader economy by quantifying the productive value of the work that would have been undertaken had the staff member been at work and less affected by the ongoing impacts of GBV. The avoided loss is estimated at approximately $7,000 per staff discloser annually, which reflects on two weeks of average wages for staff in the education sector (including on costs and overheads). This is used as the best available proxy for the value of their productive contribution while at work.

This productivity benefit is expected to be felt at a higher scale among population cohorts who face a statistically higher risk of experiencing GBV. As a result, female students and staff are generally expected to experience stronger productivity improvements than male students.[227] Further, population cohorts of women who research indicates face a higher risk of experiencing GBV, including women with a disability, culturally and linguistically diverse women, and First Nations women, are expected to face a higher productivity improvement.[228]

In higher education settings, in particular, recent studies reveal that female international students face high rates of sexual and intimate partner violence, while at the same time being less likely to seek support or make formal reports and disclosures

[224] Social Research Centre (SRC), 'National Student Safety Survey', *National Student Survey* (2022) <https://www.nsss.edu.au/results>
[225] Deloitte Access Economics, *The economic costs of sexual harassment in the workplace* (report for the Sexual Harassment National Inquiry, March 2019) <https://www.deloitte.com/content/dam/assets-zone1/au/en/docs/services/economics/deloitte-au-economic-costs-sexual-harassment-workplace-240320.pdf>
[226] Australian Government *Fair Work Ombudsman, Family and domestic violence leave* (n.d) <https://www.fairwork.gov.au/leave/family-and-domestic-violence-leave>
[227] Jacobsen, S, '"More of a Girl Thing?" Examining the Role of Gender and Campus Context in Perceptions of Risk and the Shadow of Sexual Assault.' (2022) 37 (15-16) *Journal of interpersonal violence*, NP13468-NP13496.
[228] Australian Government Department of Social Service, *The National Plan to End Violence against Women and Children 2022-2032* (2022) <https://www.dss.gov.au/system/files/resources/national-plan-end-violence-against-women-and-children-2022-2032.pdf>

due to barriers such as financial stress, housing insecurity, and low social support.[229] Barriers to reporting were also found to be compounded by unfamiliarity with Australian service systems and ineligibility for certain services due to their status as non-citizens. While the impacts of these experiences for this cohort remain under researched, it is understood that they have serious impacts on the health and wellbeing of victim-survivors which can lead to reduced academic achievement as well as non-completion or delaying of their studies.[230]

3.3.2.3 Other yearly costs

Exposure to GBV by students and staff can also result in a range of other costs, such as visits to a mental health professional or a general practitioner (GP), the costs of an investigation by the AHRC, National Student Ombudsman or a jurisdictional complaints body or anti-discrimination agency, and costs to the justice system and police services for high-risk cases. There are also associated deadweight losses from reduced tax (due to productivity losses), increased welfare payments (for unemployment while changing jobs), and government expenditure. These costs were estimated to be $459 per victim each year (adjusted to 2024 dollars) in previous work by Deloitte Access Economics.[231] By improving responses to disclosures, the burden on these systems can be reduced, contributing to overall cost savings.

This unit cost was multiplied by the number of female students and staff affected by GBV on or off campus each year who seek help, estimated using the method outlined in section 3.3 to find the total value of avoided other costs from exposure to GBV each year.

3.3.2.4 Reduced costs from non-completion or delaying of a degree (benefit to students only)

GBV can lead to physical and psychological trauma. Multiple journal articles have researched the link between sexual violence and educational attainment. A US study found that in a high school education environment, students who experienced sexual violence and other forms of GBV from peers were more likely to be absent than their peers due to safety concerns.[232] Similar impacts on university attendance are expected among Australian students who have experienced GBV due to the physical, psychological and social impacts. In a university setting, a survey to undergraduate students reflected that those who experienced sexual violence and sexual assaults responded by trying to avoid the assailant, drop a class and move residence.[233] Other studies also revealed that:

- sexual violence was the only significant predictor of leaving higher education[234]
- students who were sexually assaulted and raped were more likely to have a lower academic performance score than those who had not[235]
- students that were sexually assaulted saw significant drop in their academic performance, while a drop in their academic performance after sexual violence was significantly related to dropping out[236]
- sexual violence was related to reduced likelihood of high academic performance, as well as increased academic delay, failure, and nonattendance[237]
- individuals who experienced sexual assault were two times more at risk to have negative academic consequences[238] and sexual assault/rape was the second most impactful stressor that impacted academic work.[239]

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[229] Tarzia, L, et al., 'Australia doesn't care about me': women international students suffering alarming rates of sexual violence'(2025) *The Conversation* <https://theconversation.com/australia-doesnt-care-about-me-women-international-students-suffering-alarming-rates-of-sexual-violence-252610>.

[230] Baker, R, et al., 'Victimization history predicts academic performance in college women' (2016) 63 (6) *Journal of Counselling Psychology*, 685.

[231] Deloitte Access Economics, *The economic costs of sexual harassment in the workplace* (report for the Sexual Harassment National Inquiry, March 2019) <https://www.deloitte.com/content/dam/assets-zone1/au/en/docs/services/economics/deloitte-au-economic-costs-sexual-harassment-workplace-240320.pdf>

[232] Vivolo-Kantor, A, et al.,'Associations of Teen Dating Violence Victimization with School Violence and Bullying Among US High School Students' (2016) 86 (8) *Journal of School Health* 620.

[233] Krebs, Christopher, et al., 'The Campus Sexual Assault (CSA) Study' (2007), *National Institute of Justice, US Department of Justice* <https://www.ojp.gov/ncjrs/virtual-library/abstracts/campus-sexual-assault-csa-study>

[234] Baker, M, et al., 'Victimization history predicts academic performance in college women.' (2016) 63 (6) *Journal of Counselling Psychology*, 685.

[235] Jordan, C et al., 'An exploration of sexual victimization and academic performance among college women.' (2014) 15 (3) *Trauma, Violence, & Abuse*, 191.

[236] Mengo, C, et al., 'Violence victimization on a college campus: Impact on GPA and school dropout.' (2016) 18 (2) *Journal of College Student Retention: Research, Theory & Practice*, 234.

[237] Stermac, L et al., 'Sexual violence and women's education: Examining academic performance and persistence.' (2020) 50 (1) *Canadian Journal of Higher Education*, 28.

[238] Kaufman, M et al., 'Health and academic consequences of sexual victimization experiences among students in a university setting.' (2019) 10 (1) *Psychology & Sexuality*, 56.

[239] Tremblay, P et al., 'Negative social experiences of university and college students.' (2008) 38 (3) *Canadian Journal of Higher Education*, 57.

These results highlight that the consequences of students experiencing sexual assault and sexual violence are not just physical and psychological, but they also negatively impact their academic outcomes. The impacts of the Code resulting in either avoidance of these incidents or more timely and more appropriate response to the accidents will benefit students' wellbeing as well as their academic performance and career path.

As victims of GBV may experience disruptions to their education this may result in a delay or complete cessation of their studies. The average lost income from not finishing a degree (due to factors such as prolonged absence or dropout) as well as the costs of repeating units are factored in as a part of the reduced impact on education outcomes from improved responses to disclosures.

While the experience of victims may differ depending on their unique circumstances, this analysis assumes that exposure to GBV that results in a disclosure may delay a victim's graduation by one year. The annual cost of delaying graduation was calculated as a weighted average of the cost for both domestic and international students (noting the difference in financial costs across these cohorts). While the distribution of domestic and international students was informed by 2023 data from the Commonwealth Department of Education,[240] the annual cost of delaying graduation was calculated as the sum of the following:

- the estimated cost of delaying graduation from a bachelor's degree by one year is assumed to be equivalent to one year of full-time wages for someone with a bachelor's degree – this amount is valued at $32,954 for domestic students and $45,000 for international students
- the cost of repeating a university unit – this is calculated as the average course cost across undergraduate and postgraduate degrees, valued at $4,188 for domestic students and $4,625 international students.

Based on this approach, this CBA estimates that the potential economic cost of delaying graduation by one year is equivalent to $41,560 per person per year. This reflects the average weighted cost across all students (both domestic and international).

Some students who experience GBV and make a disclosure may not finish their qualification all together. The annual cost of incompletion per student who discloses a case of GBV was calculated as the weighted average income losses associated with not completing an undergraduate degree, postgraduate degree, or other course (e.g., enabling, non-award or micro credentials Course).

The distribution of students across qualification types was informed by 2023 data from the Commonwealth Department of Education.[241] The lifetime lost premium per student for not completing a bachelor's degree due to GBV was calculated by summing and discounting the annual full-time wages for an individual with the highest qualification of a bachelor's degree over 45 years, which is the average working life, then divided by 45 to find the annual cost.[242] This same approach was used with wages of individuals with post-graduate degrees to estimate the lifetime lost premium per student for not completing a postgraduate degree due to GBV.[243] Using this approach, the annual value of each avoided GBV-related qualification incompletion was calculated as the weighted average of these amounts, totalling $8,033.

This unit cost was multiplied by the number of students affected by GBV on or off campus each year who seek help, estimated using the method outlined in section 3.3, to find the total value of avoided non-completion or delaying of degrees from exposure to GBV each year.

3.3.3 Prevention of physical and sexual assault on campus

HEPs who adapt their practices or processes in response to the Code are expected to create a safer environment for both students and staff by preventing exposure to GBV on campus and mitigating the lifetime harms associated with such exposure. Over time, through education, the Code is likely to improve the ability for students and staff to identify risks of GBV and be empowered to speak up. This may reduce the risk of perpetration and contributing towards prevention. For the purpose of this analysis, harm from exposure to GBV is assumed to include significant physical and/or psychological injury for female students and staff as well as wage scarring for female students. However, due to limitations on available research on the economic impacts of all forms of GBV, this report estimates the benefit of GBV prevention focus on the benefits of avoided cases of physical and sexual assault on campus.

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[240] Australian Government Department of Education, *2023 Student summary tables* (2023) <https://www.education.gov.au/higher-education-statistics/resources/2023-student-summary-tables>.
[241] Ibid.
[242] Australian Bureau of Statistics, *Employee earnings* (August 2024) <https://www.abs.gov.au/statistics/labour/earnings-and-working-conditions/employee-earnings/latest-release#educational-qualifications>.
[243] Ibid.

In total, each prevented exposure to GBV is expected to result in a benefit of $363,950 if the individual is a student and $260,000 if the individual is a staff member. Based on the total potential harm to one person (either staff or student), this CBA calculates the required effectiveness of the Code in preventing cases of physical and sexual assault on the costs and benefits of the Code to breakeven even if the only impact of the Code was to avoid these cases of physical and sexual assault. This represents the minimum level of improvement required for the Code to be considered worthwhile based on the prevention of cases of physical and sexual assault alone.

3.3.3.1 Avoided harm to students and staff

GBV can cause significant physical and/or psychological injury to both students and staff. The degree of harm can differ based on the nature, severity and duration of exposure. To provide a conservative estimate of benefits, this CBA focuses only on testing how effective the Code would need to be to prevent harms associated with exposure to high-risk forms of GBV.

To monetise this benefit, research was undertaken to determine the most appropriate approach to valuation of higher risk types of GBV. The first method assumes that the benefit of avoided harm to victims of GBV is equivalent to the average compensation awarded to injured workers for psychological injuries to compensate them for their pain and suffering, medical treatment and lost earnings. The average value of a claim was used to reflect the long tail nature of severe injury claims at approximately $260,000 (adjusted to 2024 dollars).[244] This method reflects the real-world costs incurred by staff who experience severe psychological harm (including GBV such as sexual assault, harassment, abuse and hostility) in their workplace.

This same value is also applied to students in this analysis because the nature of harm caused by GBV is similar in both settings. Although students are not typically covered by workplace compensation schemes, the psychological and economic impacts of GBV can be closely aligned with those experienced by staff. In both contexts, the lives of victim-survivors can be disrupted and damaged by the trauma of GBV, which has impacts on their health and wellbeing. Students may be more vulnerable than staff due to factors such as their dependence on staff for academic progression, having comparatively less understanding of HEP policies and protocols, and potential lack of confidence in challenging inappropriate behaviour (particularly where power dynamics are at play). As a result, the benefits of avoided harm may be even greater for students.

Additional research conducted on the lifetime economic burden associated with sexual assault estimates that the lifetime costs to an average victim of sexual assault also equals approximately $260,000 (adjusted to 2024 dollars).[245] This estimate includes medical costs (including immediate injuries treated, rape-related pregnancy, and long-term psychological health outcomes), lost productivity costs and other costs (including property damage and criminal justice costs). This research provides a comprehensive estimate of the broader economic impact of severe injury from GBV, reflecting the immediate and long-term effects on a victim's health, productivity and overall life outcomes.

Based on these methods, this CBA uses $260,000 as a proxy for the value of avoided harm from each prevented case of exposure to high-risk forms of GBV. This figure offers an evidence-based estimate of the potential benefit of preventing such harm.

The total value of avoided harm from exposure to GBV is therefore calculated by multiplying this unit cost by the number of students and staff affected by GBV on campus each year. The number of students affected by GBV on campus each year is estimated using results from the 2021 NSSS, which found that 16.1 per cent of students reported experiencing sexual harassment and 4.5 per cent reported experiencing sexual assault since commencing at university.[246] The average of these two values was divided by 3.5 to account for the average number of years in a degree, resulting in 2.9 per cent, a conservative estimate of the proportion of students experiencing GBV each year.[247] This proportion was then applied to the number of students at universities not currently compliant with the Code in the base case each year to estimate the number affected by GBV each year.

The number of staff currently affected by GBV on campus each year is estimated using results from the 2023 National Tertiary Education Union (NTEU) survey, which identified that 29 per cent of staff reported experiencing sexual harassment

[244] Deloitte Access Economics, 'Regulatory Impact Statement for Occupational Health and Safety (Psychological Health) Regulations Amendment' (report for WorkSafe Victoria 2022) <https://www.vic.gov.au/sites/default/files/2022-03/Regulatory-Impact-Statement---OHS-Amendment-%28Psychological-Health%29-Regs%20%281%29.pdf>
[245] Peterson, C, et al., 'Lifetime Economic Burden of Rape Among U.S. Adults' (2017) 52(6) *American journal of preventive medicine* 691.
[246] Social Research Centre (SRC), 'National Student Safety Survey', *National Student Survey* (2022) <https://www.nsss.edu.au/results>
[247] This reflects the three-to-four-year average duration of a Bachelor's degree noting that the time spent at university can vary widely depending on the time spent on campus as well as the type of degree or micro credential.

in the workplace.[248] This value was divided by 4 to account for the average number of years of employment, resulting in 7.25 per cent as the estimated proportion of staff experiencing GBV each year.[249] This proportion was applied to the number of female staff at universities assumed not to be currently compliant with the Code in the base case each year to estimate the number impacted by GBV each year.

3.3.3.2 Avoided impacts on education

In the long term, exposure to GBV during one's education can also impact earning potential and career progression. This is typically referred to as wage scarring. Research shows that experiencing victimisation as a young person can be linked to a decline in academic engagement and poorer academic performance.[250]

One study suggests that women who experienced intimate-partner violence during adolescence obtained, on average, 0.5 fewer years of education than those who did not experience violence and that partner violence increases the likelihood of dropping out completely.[251] Reduced work hours and lower educational attainment lead to significant income losses over the lifetime for those who experience GBV. Research has found that over their lifetime, a victim of sexual violence may experience income losses valued at $103,950 per person (adjusted to 2024 dollars).[252,253]

For the purpose of this analysis, wage scarring was only assumed to impact female students who experience GBV in a higher education setting due to the possible disruption of their studies. Staff who experience GBV were not included on the assumption that they are not currently studying. This makes the estimates of benefits conservative because some staff who experience GBV may be undertaking further studies and so may also experience disruption and loss of future income.

The unit cost of $103,950 was multiplied by the number of students currently affected by GBV on campus each year, estimated using the method outlined in section 3.3.3.1, to find the total value of avoided wage scarring from exposure to GBV each year.

[248] National Tertiary Education Union, 'Sexual Harassment in the Workplace', *National Tertiary Education Union* (2023) <https://www.nteu.au/News_Articles/Media_Releases/Sexual_Harassment_Survey_Report.aspx#:~:text=%22Higher%20education%20staff%20are%20being,38%25%20reporting%20personal%20experiences%20ofharassment

[249] Australian Bureau of Statistics, *Job Mobility* (2024) <https://www.abs.gov.au/statistics/labour/jobs/job-mobility/latest-release>

[250] Institute for Women's Policy Research, 'The Economic Cost of Intimate Partner Violence, Sexual Assault and Stalking' (2017) Institute for Women's Policy Research<https://iwpr.org/wp-content/uploads/2020/10/B367_Economic-Impacts-of-IPV-08.14.17.pdf>

[251] Ibid.

[252]This research draws on data regarding the impact of sexual violence during adolescence but is being applied to students who may be older. This approach is being used due to the limited availability of data and research specifically focused on GBV in higher education settings. In practice, the benefits may be smaller if students are older.

[253] Institute for Women's Policy Research, 'The Economic Cost of Intimate Partner Violence, Sexual Assault and Stalking' (2017) Institute for Women's Policy Research<https://iwpr.org/wp-content/uploads/2020/10/B367_Economic-Impacts-of-IPV-08.14.17.pdf>

4 Costs of the Code

This chapter outlines the costs to key stakeholders associated with each standard under the Code.

4.1 Standard 1: Accountable leadership and governance

Standard 1 requires HEPs to implement appropriate leadership and governance and a whole of organisation approach to preventing and responding to GBV and follow reporting requirements. For this standard, each individual HEP will incur both transition costs and ongoing costs. The transition costs will relate to implementing appropriate leadership and governance and a whole of organisation approach, while the ongoing costs will be related to ongoing reviews and reporting. HEPs will not incur costs based on the number of employees, new employees or GBV disclosures.

For HEPs to meet the requirements of Standard 1 they require input from students and staff as such costs have been attributed to a portion of students and staff, specifically in relation to the number of hours they will spend engaging with the HEP to help develop the prevention and response plan.

Some members of the Expert Reference Group consulted for this CBA indicated that some HEPs are likely have existing data analytics capabilities, so they should not need to hire new teams to meet the requirements of this standard. Based on the information from these consultations, a reduction in time and effort has been incorporated into the modelling through attribution factors of 70% for small HEPs, 50% for medium HEPs and 25% for large HEPs, due to existing governance, policy frameworks, IT infrastructure, and platforms.

Additionally, the modelling assumes that some capabilities needed for Standard 6 will also support meeting Standard 1. As a result of these efficiency gains from both assumptions, the modelling has reduced the incremental unit costs HEPs face to meet the requirements of Standard 1. This was done for each overlapping activity by a factor of one half to avoid double counting.

In total, it is estimated that Standard 1 will impose costs of $6.7 million (present value over ten years). This reflects an average annual cost of $956,000 (undiscounted).

4.1.1 Costs to HEPs

Standard 1 will require HEPs to develop a whole-of-organisation approach to prevent and respond to GBV, which prioritises safety and support, as part of its transition costs (that occur as a once-off cost). From a cost-creation perspective, the following requirements of this standard are expected to generate costs:

- have expertise in student and staff safety and wellbeing within the membership of the HEP's governing body or a subcommittee that reports directly to the HEP's governing body that has delegated responsibility for student and staff safety and wellbeing [transition costs and ongoing costs]
- prepare, implement and publish on its website a whole-of-organisation Prevention and Response Plan [transition costs]
- if the HEP owns and/or manages a student accommodation it must comprehensively address how it will comply with its obligations under the Code in the Student Accommodation [transition costs]
- develop and implement an outcomes framework to track and measure the effectiveness of actions under their Prevention and Response Plan [transition costs and ongoing costs]
- give the Secretary a copy of the Prevention and Response Plan and outcomes framework by the Initial Reporting Date and every four years thereafter and must include a systemic review and analysis and is informed by the HEP's analysis of data [ongoing costs]
- report to the Governing Body at least every six months against the outcomes' framework for its Prevention and Response Plan, with de-identified data on incidents of GBV since the last report, including identification of any trends in the data [ongoing costs]
- must give to the Secretary every two years a report on the Prevention and Response Plan and its outcomes framework – the Secretary has the authority to determine the manner and form of these reports [ongoing costs].

4.1.1.1 Transition costs to HEPs under Standard 1

Transition costs created by Standard 1 will largely be the costs of developing the whole-of-organisation prevention and response plan and the associated outcomes framework. It is expected that the development of these documents will require a dedicated, skilled team of staff that have an extensive understanding of the HEP, its current (if any) GBV prevention and response strategies, the Code, and the required level of expertise in student and staff safety and wellbeing as required by the Code (which may require hiring new expert staff, providing additional training to current staff, or seeking support from external experts). The plan must also be publicly published via the HEP's website, which is expected to require additional time spent communicating with students and staff regarding the new plan and how it is intended to be interpreted and how it will be carried out. This transition cost has been calculated with the assumption that there will be some savings in costs due to similar requirements already in place in HEPs through compliance with Standard 6.

These costs are outlined in Table 4.1 below.

Table 4.1 Transition costs to HEPs for Standard 1

Size of HEP	Total number of hours for all transition activities per labour resource	Maximum number of labour resources per activity	Average total transition cost per HEP
Small	110	1	$11,000
Medium	134	2	$26,000
Large	189	3	$55,000

Source: Deloitte Access Economics, 2025.

4.1.1.2 Ongoing costs to HEPs under Standard 1

Ongoing costs for HEPs will stem from the regular review and reporting requirements. A dedicated, skilled team of staff with the aforementioned knowledge base (see section 4.1.1.1) will be required to prepare and submit to the Secretary a report on the prevention and response plan and its outcomes framework every two years as well as a new copy of the plan and framework with a systemic review and analysis of data every four years. This staff team is also required to report every six months against the outcomes framework to their internal Governing Body, including de-identified data on incidents of GBV since the last report and any trends in the data. These review and reporting requirements each require a level of data analysis, meaning the dedicated staff team must include data analytic capabilities, which may for some HEPs require hiring new expert staff or providing additional training. The costs associated with the data analysis have been calculated with the assumption that there will be some savings in costs due to similar requirements already in place in HEPs through compliance with Standard 6. New or upgraded IT systems may also be required to meet these data collection requirements. These costs are outlined in Table 4.2 below.

Table 4.2 Ongoing costs to HEPs for Standard 1

Size of HEP	Total number of hours for all ongoing activities per labour resource	Maximum number of labour resources per activity	Average total transition cost per HEP
Small	15	1	$1,000
Medium	24	2	$4,000
Large	33	3	$9,000

Note: Dollar values are rounded to the nearest thousand.

Source: Deloitte Access Economics, 2025.

4.1.1.3 Total cost to HEPs under Standard 1

Based on the number of HEPs, the total costs to HEPs as a result of Standard 1 of the Code are $1.5 million (present value over the ten-year analysis period) or $202,000 on average per year (undiscounted). In each size category, the attribution factor applied varies, as does the number of compliant HEPs and the ongoing and initial costs, all of which cause variations in the total costs between small, medium and large HEPs. Specifically, a larger portion of the costs resulting from the code are attributed to small HEPs, as the largest attribution factor is applied to them, with smaller scaled attribution factors applied to medium and large HEPs, respectively. As such, larger portions of the respective costs are attributed to small and medium HEPs compared to large. Additionally, there is a much larger number of small compliant HEPs, and a much smaller number of medium and large compliant HEPs (with the number of compliant medium and large HEPs being relatively similar), as such, due to the larger quantity, a much larger cost is attributed to small HEPs. The total costs per small, medium, and large HEPs are summarised in Table 4.3 below.

Table 4.3 Total costs to HEPs for Standard 1

Size of HEP	Present value over the ten-year analysis period	Average per year (undiscounted)
Small	$886,000	$117,000
Medium	$352,000	$47,000
Large	$294,000	$39,000

Note: Dollar values are rounded to the nearest thousand.

Source: Deloitte Access Economics, 2025.

4.1.2 Costs to students

The only requirement of Standard 1 that is expected to create costs to students, is that the Prevention and Response Plan must be developed through engagement and collaboration with students, including those who have experienced GBV. This consultation period will require time from a select number of students, proportionate to what would be considered representative relative to the size of the HEP, to share their experiences and views on how the HEP can effectively cater to the needs of students affected by GBV. As feedback from the sector received during stakeholder consultations ranged widely on the amount of time that would be required from students, staff and volunteers for consultations, it has been assumed that students will have a lower level of involvement in consultations (e.g., an online survey sent to all students to be completed within 30 minutes), whereas hour-long focus groups will occur for staff and volunteers.

The cost per student of participating in consultations is expected to be $18.5. This was estimated by considering the opportunity cost to students of sacrificing their personal time to partake in a consultation. The price of personal time, also known as leisure time, is valued at $37 per hour, in line with OIA's Regulatory Burden Measurement Framework. This figure is then multiplied by the number of hours spent participating in consultations (assumed to be 30 minutes per student). The modelling has taken into account that both standards 1 and 2 require stakeholder consultation and has costed appropriately given the possibility that HEPs may combine the stakeholder consultations. This is summarised in Table 4.4 below.

Table 4.4 Cost per student for Standard 1

Size of HEP	Duration of consultation per student (hours)	Number of students per consult	Average total cost per student
Small	0.5	1	$18.5
Medium	0.5	1	$18.5
Large	0.5	1	$18.5

Source: Deloitte Access Economics, 2025.

Based on the total number of students expected to participate in consultation (assumed to be approximately 2 per cent per cent of all students in the first year of the Code's implementation and 1 per cent in all subsequent years), the total costs to students associated with Standard 1 is $698,000 (present value over ten years), or approximately $102,000 on average per year (undiscounted).

4.1.3 Costs to staff

As discussed in section 4.1.2 on costs to students, under Standard 1 costs to staff will stem from the requirement for the Prevention and Response Plan to be developed through engagement and collaboration with staff, including those who have experienced GBV. This will require a select number of staff members, considered to be representative of the broader body, to share their experiences and views on how the HEP can effectively cater to the needs of staff affected by GBV. These costs are ultimately costs to the HEP based on the additional time and effort required of the broader cohort of teaching, support and administrative staff.

This CBA estimates that the cost per staff member of consultations will be $140 per consultation. This figure is based on the opportunity cost that staff members face in being required to use work hours to participate in a consultation, rather than to complete their usual work tasks. To calculate this cost the CBA multiplied the average hourly wage rate per staff member, estimated at $140 per hour (including on-costs and overheads) by the assumed duration of a consultation (assumed to be, one hour per staff member). The modelling has taken into account that both standards 1 and 2 require stakeholder consultation and has costed appropriately given the possibility that HEPs may combine the stakeholder consultations. This is summarised in Table 4.5 below.

Table 4.5 Cost per staff for Standard 1

Size of HEP	Duration of consultation per staff member (hours)	Number of staff members per consult	Average total cost per staff member
Small	1	1	$140
Medium	1	1	$140
Large	1	1	$140

Source: Deloitte Access Economics, 2025.

Based on the total number of staff expected to participate in consultation (assumed to be approximately 10 per cent of all staff in the first years of the Code's implementation and 5 per cent in all subsequent years of the Code's implementation), the total costs to staff associated with Standard 1 is $4.4 million (present value over ten years), or approximately $640,000 on average per year (undiscounted).

4.1.4 Costs to volunteers

As described in above sections, Standard 1 will create costs to community volunteers due to the requirement that the Prevention and Response Plan be developed through engagement and collaboration with staff, which according to the *WHS Act 2011* includes volunteers (see Glossary). While this report considers three types of volunteers, this section outlines the costs incurred by only community volunteers, because the cost to student volunteers and staff volunteers is already captured in sections 4.1.2 and 4.1.3. This is due to the assumption that student and staff volunteers will not be obliged to provide their perspectives in additional consultation to any consultation undertaken specifically for students or employees.

The cost of participating in consultations is expected to be $37 per community volunteer. This was estimated by considering the opportunity cost to community volunteers of sacrificing their personal time to partake in a consultation. The price of personal time, also known as leisure time, is valued at $37 per hour, in line with OIA's Regulatory Burden Measurement Framework. This figure is then multiplied by the number of hours spent participating in consultations (assumed to be the same duration as staff, therefore one hour per volunteer). This is summarised in Table 4.6 below.

Table 4.6 Cost per community volunteer for Standard 1

Size of HEP	Duration of consultation per community volunteer (hours)	Number of volunteers per consult	Average total cost per volunteer
Small	1	1	$37
Medium	1	1	$37
Large	1	1	$37

Source: Deloitte Access Economics, 2025.

Based on the total number of community volunteers expected to participate in consultations (assumed to be approximately 10 per cent of all community volunteers in the first years of the Code's implementation and 5 per cent in all subsequent years of the Code's implementation), the total costs to volunteers associated with Standard 1 is estimated to be $82,000 (present value over ten years), or approximately $12,000 on average per year (undiscounted).

4.2 Standard 2: Safe environments and systems

Standard 2 requires HEPs to implement additional safety check requirements for current and prospective employees, policies on preventing and responding to GBV and reporting requirements. Under Standard 2 HEPs will incur both transition and ongoing costs. Transition costs will be related to implementing amending or aligning policies to prevent and respond to GBV, including the capital costs of new systems. Ongoing costs are related to safety check requirements, reviews of policies and reporting

For HEPs to meet the requirements of Standard 2, they will incur safety check costs based on the number of employees and new employees. For disclosure costs, it is assumed that only a portion of employees and new employees will make a declaration. As such, HEPs will incur those costs based on the proportion of decelerations made and, therefore, the need to make alternative arrangements and manage conflict of interest plans.

Within Standard 2, costs have also been attributed to a portion of students and staff, specifically in relation to the number of hours they will spend engaging with the HEP to help develop GBV policies. All staff are assumed to incur the cost of spending time complying with the additional safety checks.

In total, it is estimated that Standard 2 will impose costs of $263 million (present value over ten years). This reflects an average annual cost of $39 million (undiscounted).

4.2.1 Costs to HEPs

Standard 2 requires that HEPs take measures to foster safe environments and systems to prevent and respond to GBV. The following requirements of this standard are expected to generate costs to HEPs:

- ensure staff comply with the Working with Children Check requirements [transition costs and ongoing costs]
- ask prospective employees and members of the governing body to declare whether they have been investigated for an allegation of GBV, or determined to have engaged in conduct that constitutes GBV during the course of their previous employment, or otherwise in a legal process, and take into consideration any risks arising from any declaration in determining the person's suitability for their position [ongoing costs]
- require employees to declare any existing or previous intimate personal relationship they have with an employee or a student, where the employee has academic, supervisory, oversight or decision-making responsibilities in relation to them [ongoing costs]
- set up processes and/or systems to ask all prospective employees to make these declarations [transition costs]
- consider any declarations and any risks that arise from declarations of GBV or alleged GBV in determining the prospective employee's suitability for their position [ongoing costs]
- develop a conflict-of-interest plan where a declaration is made of a current or previous intimate personal relationship with a person the staff member has academic, supervisory, oversight or decision-making responsibilities in relation to [ongoing costs]
- develop and implement a policy on preventing and responding to GBV that applies to all students, leadership, staff, and affiliated organisations, and accords to the Code's required information and approach [transition costs]

- implement alternative teaching, research, research supervision, employment, or living arrangements as necessary to ensure the safety of students and staff where a disclosure or formal report of GBV is made [ongoing costs]
- develop and review its policy on preventing and responding to GBV at least every three years including through engagement and collaboration with the required stakeholder bodies [ongoing costs]
- Secretary may require a HEP to report on how the engagement with and the views of stakeholders informed the development and review of the policy [ongoing costs]
- Secretary may require a HEP to report on how it has complied with its obligations under this standard in a manner and form to be prescribed by the Secretary [ongoing costs].

4.2.1.1 Transition costs to HEPs under Standard 2

The primary transition cost introduced by this standard will be to develop and implement an organisation-wide policy on preventing and responding to GBV that meets the requirements of the Code. It is expected that this policy will require additional time and resources to develop in line with the expectations of the Code, and will likely require a dedicated, skilled team of staff that have an extensive understanding of the HEP, the requirements of the Code, and expertise on best practice approaches to discussing GBV as required by the Code (for example, how to be person centred and trauma informed in content and application). To meet these requirements the HEP may need to hire new expert staff or provide additional training to current staff, some of the transition cost has been calculated with the assumption that there will be some savings in costs due to similar requirements already in place in HEPs

The total costs for HEPs in each size category (small, medium and large) is based on the corresponding attribution factor, the number of compliant HEPs and the ongoing and initial costs. These costs are outlined in Table 4.7.

Table 4.7 Transition costs to HEPs for Standard 2

Size of HEP	Total number of hours for all transition activities per labour resource	Maximum number of labour resources per activity	Average total transition cost per HEP
Small	78	10	$25,000
Medium	81	10	$39,000
Large	82	10	$51,000

Source: Deloitte Access Economics, 2025.

4.2.1.2 Ongoing costs to HEPs under Standard 2

The requirements to conduct the required safety checks and to address any identified risks are also expected to create ongoing costs. While it is assumed that some of these checks will already be required by HEPs (such as attaining a Working with Children Check) it may be that additional time and resources will be required to ensure consistent compliance throughout the organisation. However, the ongoing costs for safety checks are expected to be minimal overall, given all universities are already required to complete other background checks, such as verifying legal work rights in Australia and conducting criminal history checks, and therefore will have established processes and IT systems. As it may be the case that HEPs will only need to make minor adjustments to systems to conduct the Working with Children Checks and additional required safety checks relating to GBV, a sensitivity analysis has been conducted in Section 6, showcasing results if reduced time and labour is used to conduct these checks. Additionally, many HEP employees may already have declared relationships or preexisting allegations, as such, a sensitivity test has been conducted in Section 6 to showcase the results if a reduced number of staff make a GBV declaration.

Where a declaration is made it is expected that HEPs will need to dedicate a team to consider the declaration, assess and address any risks, and, where required, develop a conflict-of-interest plan. However, this is not required to be done by a specialist GBV expert team and is anticipated will be absorbed into the role of existing hiring or human relations (HR) team.

The prevention and response policy will also generate ongoing costs approximately every three years due to the requirement to review it. Costs are primarily expected to stem from the obligation to conduct stakeholder engagement for each review, which includes students and staff as well as subject matter experts, lived experience stakeholders, and groups disproportionately affected by GBV. This will require a dedicated, skilled team of staff that have an extensive understanding

of the HEP, the requirements of the Code, stakeholder engagement, and expertise on how to approach discussions on sensitive subject matter and lived experience of GBV. To meet these requirements the HEP may need to hire new expert staff, provide additional training to current staff, or contract a third-party organisation. The HEP will also need to dedicate additional time and resources if the Secretary requires a stakeholder engagement report and/or a report on how the HEP has complied with its obligations under this standard. These costs are outlined in Table 4.8 below.

Table 4.8 Ongoing costs to HEPs for Standard 2

Size of HEP	Total number of hours for all transition activities per labour resource	Maximum number of labour resources per activity	Average total transition cost per HEP
Small	16	2	$289
Medium	14	2	$578
Large	13	3	$867

Source: Deloitte Access Economics, 2025.

4.2.1.3 Total cost to HEPs under Standard 2

The total costs to HEPs as a result of Standard 2 of the Code are $173.2 million (present value over the ten-year analysis period) or $26.0 million on average per year (undiscounted).

Table 4.9 Total costs to HEPs for Standard 2

Size of HEP	Present value over the ten-year analysis period	Average per year (undiscounted)
Small	$27.4m	$4.1m
Medium	$75.5m	$11.3m
Large	$70.2m	$10.5m

Source: Deloitte Access Economics, 2025.

4.2.2 Costs to students

Standard 2 requires that HEPs in developing and reviewing their policy on preventing and responding to GBV must engage and collaborate with students. This consultation requirement, similar to Standard 1, will require a select number of students to sacrifice their personal time to provide their insights and ensure their HEP is compliant. As with Standard 1, it has been assumed that students will have a lower level of involvement in consultations (e.g., an online survey sent to all students to be completed within 30 minutes), whereas hour-long focus groups will occur for staff and volunteers.

Due to the similarities with Standard 1, the cost per student is $18.5. This was estimated using the same method of calculation, which multiplied the price of student's personal time, valued at $37 per hour, by the duration of time spent participating in consultations (30 minutes). The modelling has taken into account that both standards 1 and 2 require stakeholder consultation and has costed appropriately given the possibility that HEPs may combine the stakeholder consultations. This is summarised in Table 4.10 below.

Table 4.10 Total costs to students for Standard 2

Size of HEP	Duration of consultation per student (hours)	Number of students per consultation	Average total cost per student
Small	0.5	1	$18.5
Medium	0.5	1	$18.5
Large	0.5	1	$18.5

Source: Deloitte Access Economics, 2025.

Given that this standard imposes the same costs to students as Standard 1, the total costs to students associated with Standard 2 is also $698,000 (present value over ten years), or approximately $102,000 on average per year (undiscounted).

4.2.3 Costs to staff

For a HEP to comply with Standard 2 their staff must complete a variety of safety checks. For all existing staff, HEPs must ensure all employees comply with their governing state or territory's Working with Children Check requirements and declare any existing or previous intimate personal relationship they have with any student or staff where they have, or are likely to have, decision-making responsibilities in relation to. For prospective staff and members of the governing body, HEPs must require they declare whether they have been investigated for an allegation of, or determined to have engaged in conduct that constitutes GBV during their previous employment or otherwise in a legal process. This will require staff to spend time ensuring they have completed and provided these safety checks, creating an opportunity cost by diverting time away from their business-as-usual tasks.[254]

This CBA estimates that the cost per staff member to complete all safety checks will be $140. To calculate this cost the CBA multiplied the average hourly wage rate per staff member, estimated at $140 per hour (including on-costs and overheads) by the assumed duration of time per staff member required to meet each safety check requirement (one hour). Similar to the costs for students, the modelling has taken into account that both standards 1 and 2 require stakeholder consultation and has costed appropriately given the possibility that HEPs may combine the stakeholder consultations.

Further, Standard 2 also requires that staff are engaged and collaborated with in the development and reviews of the HEP's policy on preventing and responding to GBV. This will similarly impose an opportunity cost on a select number of staff, considered to be representative of the broader body, to divert their time to participate in a consultation rather than to complete their usual work tasks.

This CBA estimates that the cost per staff member will be $140 per consultation. This figure is based on the opportunity cost that staff members face in being required to use work hours to participate in a consultation, rather than to complete their usual work tasks. To calculate this cost the CBA multiplied the average hourly wage rate per staff member, estimated at $140 per hour (including on-costs and overheads) by the assumed duration of a consultation (one hour).

Overall, the total cost per staff member of both the safety requirements and the consultations will be on average $280. These figures are calculated by adding the respective costs of each activity, which are estimated by multiplying the average rate per staff member, the amount of time spent, and the number of staff affected. This is summarised in Table 4.11 below.

Table 4.11 Total costs to staff for Standard 2

Size of HEP	Duration of activity per staff (hours)	Number of staff per activity	Average total cost per staff member
Compliance with safety check requirements			

[254] The requirements for prospective employees may create additional costs to people who do not successfully fill the role, however, we do not have data to quantify these costs with certainty.

Size of HEP	Duration of activity per staff (hours)	Number of staff per activity	Average total cost per staff member
Small	1	1	$140
Medium	1	1	$140
Large	1	1	$140
Engagement and collaboration to develop and review GBV policy			
Small	1	1	$140
Medium	1	1	$140
Large	1	1	$140

Source: Deloitte Access Economics, 2025.

The total costs to staff associated with Standard 2 is $85.8 million (present value over ten years), or approximately $12.8 million on average per year (undiscounted). This considers that all staff members will need to complete safety check requirements and a select proportion will participate in consultations (assumed to be approximately 10 per cent of all staff in the first year of the Code's implementation and 5 per cent in all subsequent years of the Code's implementation).

4.2.4 Costs to volunteers

As outlined in section 4.2.3, for a HEP to comply with Standard 2 their staff must complete a variety of safety checks. This will require all volunteers to spend time ensuring they have completed and provided these safety checks, creating an opportunity cost by diverting time away from their business-as-usual tasks. The cost per volunteer to complete these checks is $74. This was estimated by multiplying the hourly rate for leisure time, valued at $37 per hour, by the assumed duration of time per volunteer required to meet each safety check requirement (two hours) (see Table 4.12 and Table 4.13).

Standard 2 also requires HEPs to engage and collaborate with students and staff when developing and reviewing their policy on preventing and responding to GBV. This consultation requirement will similarly require a select number of volunteers to divert time to participate in a consultation rather than to complete their usual work tasks. As described in section 4.1.4, this section will not consider the opportunity cost of consultation for student volunteers. It is assumed that the views of student volunteers will be captured during consultations with students, and therefore their opportunity cost is captured in section 4.2.2. The opportunity cost per community volunteer is $37 per consultation. The modelling has taken into account that both standards 1 and 2 require stakeholder consultation and has costed appropriately given the possibility that HEPs may combine the stakeholder consultations. This estimate was calculated by multiplying the hourly leisure time rate by the assumed number of hours spent participating in consultations (one hour) (see Table 4.13).

Table 4.12 Total costs to student volunteers for Standard 2

Size of HEP	Duration of activity per student volunteer (hours)	Number of student volunteers per activity	Average total cost per student volunteer
Compliance with safety check requirements			
Small	2	1	$74
Medium	2	1	$74
Large	2	1	$74

Source: Deloitte Access Economics, 2025.

Table 4.13 Total costs to community volunteers for Standard 2

Size of HEP	Duration of activity per community volunteer (hours)	Number of community volunteer per activity	Average total cost per community volunteer
Compliance with safety check requirements			
Small	2	1	$74
Medium	2	1	$74
Large	2	1	$74
Engagement and collaboration to develop and review GBV policy			
Small	1	1	$37
Medium	1	1	$37
Large	1	1	$37

Source: Deloitte Access Economics, 2025.

Overall, the total costs to student volunteers associated with Standard 2 is $1.5 million (present value over ten years), and the total costs to community volunteer associated with Standard 2 is $3.1 million (present value over ten years). These estimates assume that all volunteers will complete safety checks, and that 10 to 5 per cent of community volunteers will participate in consultations. Standard 3: Knowledge and capability

4.1 Standard 3: Knowledge and capability

Standard 3 requires HEPs to implement training, communicate initiatives, conduct risk assessments, and complete formal reports. Within this standard, HEPs will incur both transition costs and ongoing costs, the transition costs will be related to developing and implementing the training, while the ongoing costs are associated with the delivery of the training and reporting. Some of the ongoing costs, such as the delivery of training, are dependent on the number of employees a HEP has.

Within Standard 3, costs have also been attributed to a portion of students and staff (alongside a skilled team of staff and external experts if needed), spending time assisting the HEP in developing GBV education and training. All students and staff will also incur the cost of spending time completing the trainings, with staff and student leaders completing additional specialised disclosure training.

Additionally, stakeholder consultations indicated that some HEPs are likely to have existing capabilities and resources to draw on, including training programmes, delivery platforms, and education technology specialists with expertise in creating training models. As a result of the expected efficiency gains from these existing capabilities, the modelling has reduced some of the costs HEPs incur to develop and deliver training and education and to disseminate evidence-informed prevention communication and key messaging.

This will require a dedicated, skilled team of staff that have an extensive understanding of the HEP, the requirements of the Code, stakeholder engagement, and expertise on how to approach discussions on sensitive subject matter and lived experience of GBV. To meet these requirements the HEP may need to hire new expert staff, provide additional training to current staff, or contract a third-party organisation

In total, it is estimated that Standard 3 will impose costs of $663.4 million (present value over ten years). This reflects an average annual cost of $97.5 million (undiscounted).

4.1.1 Costs to HEPs

Standard 3 requires HEPs to build the knowledge and capability necessary to safely and effectively prevent and respond to GBV affecting its staff and/or students. Within this standard, HEPs will incur both transition costs and ongoing costs, the transition costs will be related to developing and implementing the training, while the ongoing costs are associated with the delivery of the training and reporting. Some of the ongoing costs, such as the delivery of training, are dependent on the number of employees a HEP has. The following requirements are expected to generate such costs:

- self-education to understand the requirements and what must be included in the prevention education and training [transition costs]
- promote and widely disseminate evidence informed GBV prevention communication and key messaging across its study, work, living and social environments [transition costs and ongoing costs]
- develop GBV prevention education and training for students, leadership and staff that is compliant with the requirements of the Code [transition costs]
- develop specialised education and training on responding to GBV disclosures for students in leadership positions, leadership, staff and any other person whom the HEP considers necessary [transition costs]
- organise, administer, and conduct stakeholder engagement with experts, staff, students, lived experience stakeholders, and cohorts disproportionately affected by GBV, to inform development of all GBV training and education [transition costs]
- if required by the Secretary – develop a report on how stakeholder engagement informed the development of all GBV education and training [transition costs]
- deliver all GBV education and training [ongoing costs]
- time required for all staff to complete all GBV education and training during staff hours [ongoing costs]
- undertake ongoing monitoring and evaluation of all GBV education and training, and use results to inform future education and training [ongoing costs]
- conduct regular GBV risk assessments [ongoing costs]
- if required by the Secretary – develop a report on how it has complied with its obligations [ongoing costs].

4.1.1.1 Transition costs to HEPs under Standard 3

To develop and implement all mandatory GBV education and training, HEPs will face a variety of transition costs. It is anticipated that the primary transition cost under this standard will be associated with developing all GBV messaging, education and training (including promoting and widely disseminating evidence informed GBV prevention communication and key messaging across its study, work, living and social environments). Due to the scale of these programs, it is anticipated that each set of education and training, prevention and disclosure responses, will require a dedicated team of staff with specialised subject-matter expertise. To meet these requirements, it is anticipated that some HEPs may need to hire new expert staff, provide additional training to current staff, and/or contract a third-party expert/specialist organisation.

Additionally, the requirement for all education and training to be informed by stakeholder engagement is expected to generate costs, particularly as a result of the length of time it could require.

Table 4.14 Transition costs to HEPs for Standard 3

Size of HEP	Total number of hours for all transition activities per labour resource	Maximum number of labour resources per activity	Average total transition cost per HEP
Small	58	1	$6,000
Medium	79	2	$15,000
Large	120	3	$35,000

Source: Deloitte Access Economics, 2025.

4.1.1.2 Ongoing costs to HEPs under Standard 3

Ongoing costs for HEPs will be generated as HEPs deliver training and education and monitor and evaluate the effectiveness of each course. The delivery of training and education is expected to incur opportunity costs due to existing staff diverting their productive hours to deliver these courses and for all employees, including leadership, to complete the courses during

work hours. HEPs will also incur costs to dedicate a team of staff to disseminate evidence-informed prevention communication and key messaging across its study, work, living and social environments, as well as to run prevention initiatives, including programs and campaigns.

The requirement to regularly monitor and evaluate the effectiveness of all GBV education and training courses and to use these findings to inform future iterations of the courses will also require a dedicated, skilled team of staff that have extensive understanding of the training and education courses and the requirements of the Code. This team will also need to dedicate additional time and resources if the Secretary requires a report on how the HEP has complied with its obligations under this standard.

This standard also requires that all staff involved in risk assessments and in responding to formal reports, investigations, and disciplinary proceedings have specific knowledge and expertise relating to GBV. To meet these requirements HEPs may need to hire new expert staff, provide additional training to current staff, or contract a third-party organisation.

Table 4.15 Ongoing costs to HEPs for Standard 3

Size of HEP	Total number of hours for all transition activities per labour resource	Maximum number of labour resources per activity	Average total transition cost per HEP
Small	83	1	$7,000
Medium	65	2	$11,000
Large	49	3	$12,000

Source: Deloitte Access Economics, 2025.

4.1.1.3 Total cost to HEPs under Standard 3

The total costs to HEPs as a result of Standard 3 of the Code are $375.6 million (present value over the ten-year analysis period) or $54.6 million on average per year (undiscounted).

Table 4.16 Total costs to HEPs for Standard 3

Size of HEP	Present value over the ten-year analysis period	Average per year (undiscounted)
Small	$54.5m	$8.2m
Medium	$158.9m	$23.3m
Large	$162.1m	$23.2m

Source: Deloitte Access Economics, 2025.

4.1.2 Costs to students

Standard 3 will create two types of costs to students: completing GBV education and training (through online courses or seminars lasting approximately 30 minutes) and providing insights to shape the development of GBV prevention education and training and future reviews (through online surveys to be completed within 30 minutes). The Standard requires HEPs to ensure that all students complete ongoing, comprehensive prevention education and training. Students in leadership positions must also be required to, as part of the onboarding process and subsequently on at least an annual basis, complete specialised education and training on responding to disclosures and formal reports of GBV. This will create opportunity costs as students sacrifice their personal time to complete all their required GBV education and training.

Similarly, select students will also sacrifice their personal time to participate in consultations that shape the development and reviews of the prevention education and training. This opportunity cost per student is estimated at $18.5 per consultation. This figure was calculated by multiplying the price of student's personal time, valued at $37 per hour, by the duration of each education and training course and each consultation (30 minutes each) (see Table 4.17).

Table 4.17 Total costs to students for Standard 3

Size of HEP	Duration of activity per student (hours)	Number of students per activity	Average total cost per student
Engagement and collaboration to develop and review GBV education and training			
Small	0.5	1	$18.50
Medium	0.5	1	$18.50
Large	0.5	1	$18.50
All students completing GBV prevention education and training			
Small	0.5	1	$18.50
Medium	0.5	1	$18.50
Large	0.5	1	$18.50
Students in leadership positions completing specialised GBV disclosure education and training			
Small	0.5	1	$18.50
Medium	0.5	1	$18.50
Large	0.5	1	$18.50

Source: Deloitte Access Economics, 2025.

As described in the costs to students of Standards 1 and 2, based on the total number of students expected to participate in consultation (assumed to be approximately 2 per cent of all students in the first year of the Code's implementation, approximately 900 students, and 1 per cent, approximately 600 students per year, in all subsequent years, while 600 students leaders are expected to participate in consultation every year). The total costs to students associated with Standard 3 is $66.3 million (present value over ten years), or approximately $9.9 million on average per year (undiscounted).

4.1.3 Costs to staff

Standard 3 creates three requirements that will create costs for staff: completing GBV prevention education and training, completing specialised GBV disclosure responses education and training, and providing insights to shape the development of prevention education and training and future reviews. Unlike for students, all staff members are required to undergo both streams of GBV education and training, creating extra time requirements for this cohort. A variation in the number of hours of education and training between small, medium and large HEPs (with medium and large providers providing more education and training) is assumed to occur, due to larger HEPs having the resources to provide more hours of education and training. Additionally, due to the higher number of staff in large HEPs, it is assumed that an increased amount of education and training will be required to ensure all staff members receive the same level of knowledge. Additionally small HEPs are also assumed to have fewer financial resources, but also less complex systems and less students reducing the time needed, while larger HEPs more likely of to have teams of people (or more sophisticated processes) which whilst making them more efficient is also due to the fact they are dealing with more complex systems and more students. Additionally, it

has been assumed that the training required under Standard 3 for staff may be an extension of existing programs rather than new initiatives. The cost per staff member for Standard 3 is summarised in Table 4.18. These are estimated to be $2,590. This is an estimate of opportunity cost, calculated by multiplying the duration of each activity by the average hourly wage rate per staff member of $140 per hour (including on-costs and overheads 3.2.2).

Table 4.18 Total costs to staff for Standard 3

Size of HEP	Duration of activity per staff member (hours)	Number of staff members per activity	Average total cost per staff member
Engagement and collaboration to develop and review GBV education and training			
Small	0.5	1	$70
Medium	0.5	1	$70
Large	0.5	1	$70
Complete GBV prevention education and training			
Small	0.5	1	$70
Medium	1	1	$140
Large	1.5	1	$210
Complete specialised GBV disclosure responses education and training			
Small	2	1	$280
Medium	4	1	$560
Large	8	1	$1,120

Source: Deloitte Access Economics, 2025.

Similar to standards 1 and 2, the total number of staff expected to participate in consultation is assumed to be approximately 10 per cent of all staff in the first years of the Code's implementation and 5 per cent in all subsequent years of the Code's implementation. Accounting for this proportion participating in consultation and that all staff must complete all GBV trainings, the total costs to staff associated with Standard 3 is $205.9m (present value over ten years), or approximately $30.7 million on average per year (undiscounted).

4.1.4 Costs to volunteers

Volunteers are expected to meet the same obligations as staff members, which include completing GBV prevention and specialised GBV disclosure responses education and training, as well as providing insights to shape the development of prevention education and training and future reviews. As described in previous sections, the opportunity cost to student volunteers of participating in consultations is captured in section 4.1.2, and therefore will not be outlined in this section. However, as staff members, student volunteers are expected to complete the specialised disclosure training which is not required of students generally.

The cost per student volunteer and community volunteer for Standard 3 are summarised in Table 4.19 and Table 4.20, respectively. These estimates of opportunity cost are calculated by multiplying the duration of each activity by the hourly leisure time rate. The duration of each education and training course and each consultation are assumed to be 1 hour per session respectively.

Table 4.19 Total costs to student volunteers for Standard 3

Size of HEP	Duration of activity per student volunteer (hours)	Number of student volunteers per activity	Average total cost per student volunteer
Student volunteers to complete GBV prevention education and training			
Small	0.5	1	$18.50
Medium	1.5	1	$55.50
Large	3.5	1	$129.50
Student volunteers not in leadership positions to complete specialised GBV disclosure education and training			
Small	1.5	1	$55.50
Medium	3.5	1	$129.50
Large	7.5	1	$277.50

Source: Deloitte Access Economics, 2025.

Overall, the total costs to student volunteers associated with Standard 3 is $3.5 million (present value over ten years), or approximately $512,000 on average per year (undiscounted).

Table 4.20 Total costs to community volunteers for Standard 3

Size of HEP	Duration of activity per community volunteer (hours)	Number of community volunteers per activity	Average total cost per community volunteer
Engagement and collaboration to develop and review GBV education and training			
Small	0.5	1	$18.50
Medium	0.5	1	$18.50
Large	0.5	1	$18.50
Community volunteers to complete GBV prevention education and training			
Small	2	1	$74
Medium	4	1	$148
Large	8	1	$296
Community volunteers to complete specialised GBV disclosure education and training			
Small	2	1	$74

Size of HEP	Duration of activity per community volunteer (hours)	Number of community volunteers per activity	Average total cost per community volunteer
Medium	4	1	$148
Large	8	1	$296

Source: Deloitte Access Economics, 2025.

Overall, the total costs to community volunteers associated with Standard 3 is $19.0 million (present value over ten years), or approximately $2.8 million on average per year (undiscounted).

4.2 Standard 4: Safety and support

For HEPs to meet the requirements of Standard 4, they will not require input from students and staff. HEPs will incur one-off transition costs related to developing compliant responses, support services and systems, as well as ongoing costs associated with providing in-house support services, monitoring the effectiveness of the services, and reporting.

Some ongoing costs will depend on the number of GBV disclosures and formal reports a HEP incurs. While many students and staff experience GBV both within and outside higher education institutions, evidence demonstrates that only a portion of those affected by GBV seek help and make a disclosure. As such, the modelling only assumes a small portion of those students and staff experiencing staff GBV will make a disclosure. It is assumed that through the implementation of the Code, the proportion of disclosures and formal reports will increase, resulting in increased costs for the HEP. Additionally, the costing for this standard has been done with the assumption that HEPs would be aligning and enhancing existing services rather than building entirely new systems and offering new services.

Additionally, it has been assumed that some of the capabilities needed to meet the requirements of Standard 4 in relation to accessible and anonymous reporting are likely to already exist in HEPs, as such the modelling has reduced some of the related transition and ongoing costs due to HEPs aligning and enhancing existing services.

In total, it is estimated that Standard 4 will impose costs of $134.9 million (present value over ten years). This reflects an average annual cost of $22.0 million (undiscounted).

4.2.1 Costs to HEPs

Standard 4 requires HEPs to implement responses and support services that are safe and person-centred, including the provision of effective safety and support for disclosers and respondents. Additionally, HEPs must also comply with the Standard's reporting requirements. The following requirements are expected to generate costs to HEPs:

- opportunity cost of time developing responses, practices and support services [transition costs]
- opportunity cost associated with complying with Code requirements, person-centred, trauma-informed approach and best practice [ongoing costs]
- opportunity cost associated with explaining the available supports to persons making disclosures and/or formal reports and to respondents [ongoing costs]
- opportunity cost of promoting and making widely available information (in English and other languages) about how students and staff can access internal and/or external supports [transition costs]
- opportunity cost of providing support services that are safe, person centred and consistent with a trauma informed approach and best practice [ongoing costs]
- opportunity cost of implementing safety measures in response to disclosures or formal reports [transition costs]
- opportunity cost of having expert staff develop a tailored safety plan with the discloser [ongoing costs]
- enacting the plan developed and/or prioritising urgent access to services (accredited specialist/translation and interpreter services), and undertaking ongoing risk assessments [ongoing costs]
- opportunity cost of implementing safety measures for respondents [transition costs]
- opportunity cost associated with staff developing in consultation with the respondent a tailored support plan (someone with expertise must do this) [ongoing costs]
- enacting the plan developed and/or prioritising access to services (accredited specialist/translation and interpreter services), and undertaking ongoing risk assessments [ongoing costs]
- opportunity cost associated with monitoring and evaluating the effectiveness of those services every three years [ongoing costs]

- opportunity cost of undertaking a risk assessment in response to all disclosures and formal reports on GBV, as well as monitor and manage the risks [ongoing costs]
- opportunity cost of reporting to the secretary on its compliance with obligations under the Standard [ongoing costs].

4.2.1.1 Transition costs to HEPs under Standard 4

To implement the requirements of Standard 4, HEPs will need to develop responses, practices, safety measures, and support services for disclosers and respondents that are safe, person centred and consistent with a trauma informed approach and best practice. Consequently, to develop these tools and services, staff must have relevant knowledge and expertise on GBV, including how to respond to perpetrators, as well as how to deliver trauma-informed care, which may require some HEPs to hire new expert staff, provide additional training to current staff, and/or contract a third-party organisation.

HEPs will also be required to develop, promote, and make widely available information, in plain English and other languages, about how students and staff can access internal and/or external services. This is expected to require relatively fewer time and resources from staff, given there is likely to be established processes to develop and disseminate these types of materials around campus.

Table 4.21 Transition costs to HEPs for Standard 4

Size of HEP	Total number of hours for all transition activities per labour resource	Maximum number of labour resources per activity	Average total transition cost per HEP
Small	45	3	$13,000
Medium	34	5	$16,000
Large	23	7	$16,000

Source: Deloitte Access Economics, 2025.

4.2.1.2 Ongoing costs to HEPs under Standard 4

The ongoing costs to HEPs of Standard 4 are associated with responding to disclosures and formal reports, and providing the necessary responses, safety measures, and support services. HEPs are also required to undertake a risk assessment in response to every disclosure and formal report of GBV and manage and monitor any identified risks on an ongoing basis. To provide each of these responses to the quality required by the Code, HEPs will require a dedicated, skilled team of staff that have an extensive understanding of all GBV policies and procedures, the requirements of the Code, and how to provide safe and trauma-informed care to both disclosers and respondents. To meet these requirements the HEP may need to hire new expert staff (such as social workers), provide additional training to current staff, or contract a third-party organisation.

The requirement to monitor and evaluate the effectiveness of its support services and to use these findings to inform future service delivery will also require a dedicated, skilled team of staff that have extensive understanding of all internal GBV policies and procedures and the requirements of the Code. This team will also need to dedicate additional time and resources if the Secretary requires a report on how the monitoring and evaluation of its support services has informed future service delivery.

Table 4.22 Ongoing costs to HEPs for Standard 4

Size of HEP	Total number of hours for all transition activities per labour resource	Maximum number of labour resources per activity	Average total transition cost per HEP
Small	92	3	$3,000
Medium	111	5	$3,000

Size of HEP	Total number of hours for all transition activities per labour resource	Maximum number of labour resources per activity	Average total transition cost per HEP
Large	132	7	$3,000

Source: Deloitte Access Economics, 2025.

4.2.1.3 Total cost to HEPs under Standard 4

The total costs to HEPs as a result of Standard 4 of the Code are $134.9 million (present value over the ten-year analysis period) or $22.0 million on average per year (undiscounted).

Table 4.23Total costs to HEPs for Standard 4

Size of HEP	Present value over the ten-year analysis period	Average per year (undiscounted)
Small	$20.1m	$3.2m
Medium	$62.1m	$10.1m
Large	$52.9m	$8.6m

Source: Deloitte Access Economics, 2025.

4.2.2 Costs to students

Students are not expected to incur any direct costs related to Standard 4, because it will not introduce requirements that necessitate their time, resources, or labour over and above the base case.

4.2.3 Costs to staff

Staff are not expected to incur any direct costs related to Standard 4, because it will not introduce requirements that necessitate their time, resources, or labour over and above the base case.

4.2.4 Costs to volunteers

Volunteers are not expected to incur any direct costs related to Standard 4, because it will not introduce requirements that necessitate their time, resources, or labour over and above the base case.

4.3 Standard 5: Safe processes

Standard 5 requires HEPs to implement processes that provide safe and timely support. Additionally, HEPs must also comply with the reporting requirements. For HEPs to meet the requirements of Standard 5, they will not require input from students and staff.

HEPs will incur transition costs related to developing accessible and anonymous reporting mechanisms and ongoing costs for promoting and running the channels and identifying trends. Additional ongoing costs associated with running investigations, managing outcomes, disciplinary processes, and appeals will occur per disclosure to the HEP. As detailed in Standard 4, of the students and staff experiencing GBV, only a portion will make a disclosure, as disclosures and formal repots increase, the ongoing costs for this standard will also increase.

In total, it is estimated that Standard 5 will impose costs of $40.1 million (present value over ten years). This reflects an average annual cost of $6.4 million (undiscounted).

4.3.1 Costs to HEPs

Standard 5 aims to ensure that HEPs provide safe and timely responses to disclosures and formal reports of GBV. To achieve this aim, the Standard creates several requirements that aim to improve the availability, accessibility, and transparency of

reporting and investigation processes. To estimate the costs that these requirements will impose on HEPs, this report has identified the following costs:

- opportunity cost associated with establishing multiple channels for staff, students and third parties to make a disclosure or formal report of GBV [transition costs]
- opportunity cost associated with promoting multiple channels [ongoing costs]
- opportunity cost associated with running multiple channels/pathways and identifying any trends and risks to inform future actions [ongoing costs]
- opportunity cost associated with running investigations [ongoing costs]
- opportunity cost associated with managing outcomes [ongoing costs]
- opportunity cost associated with disciplinary processes [ongoing costs]
- opportunity cost associated with appeals [ongoing costs]
- opportunity cost of reporting to the secretary on its compliance [ongoing costs].

4.3.1.1 Transition costs to HEPs under Standard 5

Transition costs for Standard 5 are anticipated to stem from the requirement for HEPs to establish multiple reporting options for staff, students and third parties to make disclosures or formal reports of GBV. This must include anonymous reporting, as well as different avenues of reporting including in-person and online. This is expected to require capital costs to buy new or to update IT systems and software, and labour costs to allocate a skilled team to monitor and operate each channel. To meet these requirements the provider may need to hire new expert staff, provide additional training to current staff, or contract a third-party organisation.

Table 4.24 Transition costs to HEPs for Standard 5

Size of HEP	Total number of hours for all transition activities per labour resource	Maximum number of labour resources per activity	Average total transition cost per HEP
Small	30	3	$9,000
Medium	20	5	$10,000
Large	10	8	$8,000

Source: Deloitte Access Economics, 2025.

4.3.1.2 Ongoing costs to HEPs under Standard 5

The ongoing costs of Standard 5 generally stem from responses to disclosures, including running investigations, managing outcomes, disciplinary processes, and appeals. The Standard requires that HEPs take reasonable and proportionate action in respect of anonymous disclosures or formal reports, including identifying any trends and risks to inform future action to prevent GBV. To comply with this requirement, it is expected that a full-tine, skilled team will be required to manage responses to all disclosures and formal reports within the required time limits, as well as to collect and analyse the required data.

Table 4.25 Ongoing costs to HEPs for Standard 5

Size of HEP	Total number of hours for all transition activities per labour resource	Maximum number of labour resources per activity	Average total transition cost per HEP
Small	32	3	$5,000
Medium	47	5	$13,000

Size of HEP	Total number of hours for all transition activities per labour resource	Maximum number of labour resources per activity	Average total transition cost per HEP
Large	62	8	$18,000

Source: Deloitte Access Economics, 2025.

4.3.1.3 Total cost to HEPs under Standard 5

The total costs to HEPs as a result of Standard 5 of the Code are $40.1 million (present value over the ten-year analysis period) or $6.4 million on average per year (undiscounted).

Table 4.26Total costs to HEPs for Standard 5

Size of HEP	Present value over the ten-year analysis period	Average per year (undiscounted)
Small	$7.4m	$1.2m
Medium	$17.3m	$2.8m
Large	$15.4m	$2.4m

Source: Deloitte Access Economics, 2025.

4.3.2 Costs to students

Students are not expected to incur any direct costs related to Standard 5, because it will not introduce requirements that necessitate their time, resources, or labour over and above the base case.

4.3.3 Costs to staff

Staff are not expected to incur any direct costs related to Standard 5, because it will not introduce requirements that necessitate their time, resources, or labour over and above the base case.

4.3.4 Costs to volunteers

Volunteers are not expected to incur any direct costs related to Standard 5, because it will not introduce requirements that necessitate their time, resources, or labour over and above the base case.

4.4 Standard 6: Data, evidence and impact

Standard 6 requires HEPs to implement data collection systems to inform their approach, measure change and help build the national evidence base. Additionally, under the Code, annual reporting, including disaggregated demographic data, data on each disclosure, formal report, and a HEP's response following a disclosure and outcomes on the investigations and disciplinary process, must be included.

For HEPs to meet the requirements of Standard 6, they will not require input from students and staff. HEPs will not incur costs based on the number of employees, new employees or GBV disclosures but will incur both transition costs and ongoing costs. The transition costs will be related to the capital costs to purchase new systems and the setup of those systems, whereas the ongoing costs will be associated with data gathering, the use of the data and annual reporting.

In total, it is estimated that Standard 6 will impose costs of $11.3 million (present value over ten years). This reflects an average annual cost of $1.5 million (undiscounted).

4.4.1 Costs to HEPs

Standard 6 requires HEPs to implement data collection systems to inform their approach, measure change and help build the national evidence base. Additionally, under the Code, annual reporting, including disaggregated demographic data, data on each disclosure, formal report, and a HEP's response following a disclosure and outcomes on the investigations and

disciplinary process, must be included. The transition costs of this standard are related to the capital costs to purchase new systems and the setup of those systems, whereas the ongoing costs will be associated with data gathering, the use of the data, and annual reporting. These costs include:

- costs associated with setting up new IT systems to run safety checks [transition costs]
- costs associated with data gathering [transition costs]
- opportunity cost of data collection [ongoing costs]
- opportunity cost associated with complying with the Code for data collection i.e. de-identifying data associated policies and procedures [ongoing costs]
- opportunity cost associated with complying with the Code for the use of the data collected [ongoing costs]
- opportunity cost of time spent using the data to strengthen the HEP's whole-of-organisation plan [ongoing costs]
- opportunity cost of time spent using the data to inform impact and planning and enables a systemic approach to preventing and responding to GBV [ongoing costs]
- opportunity cost of using the data to evaluate systems and providing timely recommendations to HEPs to strengthen systems [ongoing costs]
- opportunity cost of time spent reporting to the secretary data required under the Code (including publishing data if required) [ongoing costs].

4.4.1.1 Transition costs to HEPs under Standard 6

Standard 6 is anticipated to generate a number of capital costs to HEPs, associated with upgrading or adopting new IT systems capable of tracking the scale of data required. This data includes:

- process data on the implementation of policies, procedures, plans and related activities
- de-identified data on incidents of GBV enabling trend analysis and systemic responses
- administrative de-identified demographic, characteristic, and enrolment data of disclosers and respondents.

The scale of this requirement is therefore anticipated to necessitate sophisticated IT systems, including significant data storage capacity. Further, HEPs will be required to dedicate a team of staff with requisite data analysis and IT expertise to monitor these systems and analyse and report on the data generated to the governing body and the Secretary. Where this capability does not already exist within the organisation, HEPs will need to hire new expert staff, provide additional training to current staff, and/or contract a third-party organisation (to ensure data is inputted correctly). Consequently, Standard 6 is anticipated to generate the highest transition costs of the Code.

Table 4.27 Transition costs to HEPs for Standard 6

Size of HEP	Total number of hours for all transition activities per labour resource	Maximum number of labour resources per activity	Average total transition cost per HEP
Small	160	10	$93,000
Medium	180	10	$134,000
Large	200	10	$171,000

Source: Deloitte Access Economics, 2025.

4.4.1.2 Ongoing costs to HEPs under Standard 6

Once IT systems are in place, ongoing costs are expected to stem from subscription costs and gathering and using the data to inform future practice. Due to the scale of data and the frequency of evaluations and general reporting it is likely to require a full-time dedicated group of staff, whose size will likely depend on the organisation. Furthermore, HEPs will need to dedicate additional time and resources in the lead up to federal reporting dates, such as to compile and report this data to the Australian Government annually.

However, ongoing costs are expected to reduce over time as the HEPs become more familiar with systems and the data requirements, and processes begin to become streamlined.

Table 4.28 Transition costs to HEPs for Standard 6

Size of HEP	Total number of hours for all transition activities per labour resource	Maximum number of labour resources per activity	Average total transition cost per HEP
Small	82	2	$13,000
Medium	67	3	$15,000
Large	52	4	$15,000

Source: Deloitte Access Economics, 2025.

4.4.1.3 Total cost to HEPs under Standard 6

The total costs to HEPs as a result of Standard 6 of the Code are $30.9 million (present value over the ten-year analysis period) or $4.3 million on average per year (undiscounted).

Table 4.29Total costs to HEPs for Standard 6

Size of HEP	Present value over the ten-year analysis period	Average per year (undiscounted)
Small	$9.2m	$1.2m
Medium	$1.5m	$196,000
Large	$665,000	$84,000

Source: Deloitte Access Economics, 2025.

4.4.2 Costs to students

Students are not expected to incur any direct costs related to Standard 6, because it will not introduce requirements that necessitate their time, resources, or labour.

4.4.3 Costs to staff

Staff are not expected to incur any direct costs related to Standard 6, because it will not introduce requirements that necessitate their time, resources, or labour.

4.4.4 Costs to volunteers

Volunteers are not expected to incur any direct costs related to Standard 6, because it will not introduce requirements that necessitate their time, resources, or labour over and above the base case.

4.5 Standard 7: Safe Student Accommodation

Standard 7 requires that SAPs that are owned, operated, managed or under the control of HEPs comply with relevant requirements of Standards 1 to 6, tailored to the unique context of residential settings. Under the Code, HEPs will not be permitted to promote, reserve spaces in, or allow a SAP to utilise their logo or intellectual property, unless a legally binding agreement is in place which meets the requirements of this standard.

Given Standard 7 makes requirements for SAPs, it is considered that these requirements apply equally to the HEPs that own, operate, manage, or are affiliated with them. This is because HEPs will need to ensure the SAPs they have relationships with are compliant with the Code. As a result, in some cases this CBA assumes that costs incurred by SAPs to comply with Standard 7 may be shared or passed on to the HEPs they are affiliated with. This depends on the arrangements between the HEP and the SAP. The CBA does, however, separately quantify the opportunity costs to the staff of SAPs who will be required

to undertake additional activities to support compliance with the Code, including training, consultation and submitting the relevant checks (section 4.5.3). Consultation with broader industry including, affiliated/associated Student Accommodation Providers (SAPs), was not in scope for this analysis. To estimate the costs to these stakeholders, this analysis relies on inputs and assumptions determined in consultation with the Department's Expert Reference Group.

The costs per HEP of Standard 7 will increase with the number of student accommodations they are affiliated with and the number of their students who live in them. Based on data provided by the Department of Education on the number of SAPs that are owned, operated, managed or under the control of HEPs, it is estimated that:

- 1 per cent of these student accommodations are affiliated with small HEPs
- 44 per cent are affiliated with medium HEPs
- 55 per cent are affiliated with large HEPs.

The costs include ensuring that accommodation providers have appropriate leadership and governance, and that the accommodation providers' staff comply with the Code. The Code requires accommodation providers to have safe environments and systems, including support services for disclosures or formal reports. Additionally, the Code requires the HEP to report how it complies with its obligations.

HEPs will incur both transition costs and ongoing costs, the transition costs will be related to setting up appropriate leadership and governance, and safe environments and support systems. The ongoing costs will be related to ensuring accommodation providers comply with the Code, monitoring and measuring progress and reviewing policies and procedures. A portion of the ongoing costs will be directly affected by the number of disclosures and formal reports from residents in accommodation providers. Similar to Standards 4 and 5, the number of disclosures and formal reports is proportionate to the number of residents who seek help after being affected by GBV.

Additionally, it is assumed that some of the capabilities for risk assessments needed to meet the requirements of Standard 3 will also help meet the requirements of Standard 7, as such, the modelling has reduced the costs HEPs are expected to incur to meet the requirements of Standard 7.

In total, it is estimated that Standard 7 will impose costs of $31.2 million (present value over ten years). This reflects an average annual cost of $4.8 million (undiscounted).

4.5.1 Costs to HEPs/SAPs

Standard 7 strengthens the role and accountability of HEPs and/or their affiliated student accommodations. It requires HEPs/SAPs to develop and enforce a comprehensive suite of policies, procedures, and support services designed to prevent GBV and improve responses to disclosures and formal reports within student residences. Such costs may be borne by either HEPs or SAPs, depending on the contractual and legal arrangement between the HEP and SAP. To be compliant, HEPs/SAPs are anticipated to face a variety of transition and ongoing costs, including:

- prepare, implement and publish on its website a Whole-of-Organisation Prevention and Response Plan [transition costs]
- monitor and measure the impact of the Prevention and Response Plan on an ongoing basis [ongoing costs]
- update the Prevention and Response Plan at least every four years [ongoing costs]
- adopt the HEP's GBV policies and procedures on preventing and responding to GBV [transition costs]
- prepare and implement its own policy on preventing and responding to GBV that applies to residents and student accommodation staff [transition costs]
- develop and review the student accommodation's prevention and response policy for residents and staff at least every three years, including through engagement and collaboration with key stakeholders [ongoing costs]
- have arrangements in place with a SAP to ensure that risk assessments are only undertaken by persons who have the requisite expertise and experience outlined in Standard 3 [transition costs]
- undertake a risk assessment within 48 hours of receiving a disclosure or formal report of GBV, determine safety measures to be implemented to protect the safety of the discloser and other residents, and manage and monitor any identified risks on an ongoing basis [ongoing costs]
- 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 requirements in Standard 4 [ongoing costs]
- within 48 hours of a disclosure or formal report, develop and implement a support plan collaboratively with and as desired by the respondent in accordance with the requirements in Standard 4 [ongoing costs]
- provide information to the HEP about the disclosure, including informing the HEP of the outcome of the risk assessment and for assistance with managing and monitoring any identified risks [ongoing costs]

- enable a discloser to elect that the HEP leads the response to the disclosure, including supports, and any investigation and/or disciplinary process, and if the discloser so elects, require the SAP to co-operate fully with the HEP and implement any outcomes decided by the HEP [ongoing costs]
- have arrangements in place with a SAP that requires data collection and reporting to the HEP consistent with Standard 6 [ongoing costs]
- complete additional safety checks for student accommodation staff (including to require staff to declare whether they have been investigated for an allegation of GBV, whether they have been determined to have engaged in conduct that constitutes GBV, and any existing or previous intimate personal relationship with a resident), and manage any risks that arise from any declaration [ongoing costs]
- require residents, student accommodation staff, and any staff whose substantive role is in connection with the student accommodation, to undertake prevention and responding to disclosures education and training that meets the requirements of Standard 3 and is tailored to the student accommodation environment [ongoing costs]
- actively promote and make accessible and widely available information about how residents and student accommodation staff can access policies and procedures and internal and/or external support services, drafted in plain English and able to be translated into different languages [transition costs]
- ensure responses, practices and support services available for victim-survivors of GBV are safe, person-centred and consistent with a trauma-informed approach [transition costs]
- require any prevention initiatives, including programs and campaigns, delivered by the SAP to be evidence-based and evaluated, and evaluation findings must inform future prevention initiatives [ongoing costs]
- 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, including relocation of the respondent to alternative accommodation and/or arranging available urgent support services for the discloser [ongoing costs]
- ensure student accommodation complies with the Code [ongoing costs]
- provide by 30 June each year the names of all the HEPs student accommodations and, if required by the Secretary, develop a report on how it has complied with its obligations under this standard in a manner and form to be prescribed by the Secretary [ongoing costs].

4.5.1.1 Transition costs to HEPs/SAPs under Standard 7

To comply with Standard 7 as the Code is introduced, HEPs/SAPs will need to take a number of immediate actions to ensure their student accommodation/s meet all requirements. Transition costs will stem from the requirement that student accommodations both adopt the HEP/SAP's plans and policy to prevent and respond to GBV, but also develop their own iterations that are tailored to their context. This is assumed to require a dedicated team of staff that have extensive knowledge of both the Code, the HEP/SAP's organisation-wide plan and policy, as well as expertise on GBV, person-centred and trauma-informed approach, and what support services are available. Where this knowledge and expertise is not already available among student accommodation staff, the HEP/SAP may need to hire new expert staff, provide additional training to current staff, or allocate its on-campus staff to help with the adoption, development, and implementation of the plans and policies. This transition cost has been calculated with the assumption that there will be some savings in costs due to similar requirements already in place in HEP/SAPs through compliance with Standard 3.

Similarly, student accommodation staff will need to be equipped to undertake GBV risk assessment and to deliver responses, practices and support services to disclosers that are safe, person centred and consistent with a trauma informed approach. The Code makes specific requirements around the level of expertise and experience that staff in these roles must have which is assumed may not be currently available in most student accommodations, or at least not to the full extent mandated. As a result, the HEP/SAP may need to hire additional expert staff or an external organisation or may choose to streamline these roles to be performed by the same team who respond to on-campus disclosures.

Lastly, HEP/SAPs must allocate resources to develop, promote, and make widely available information, in plain English and other languages, about how residents and student accommodation staff can access policies and procedures and internal and/or external support services. As mentioned in section 4.2.1.1, this is expected to require relatively less time and resources from staff compared to other requirements, given there is likely to be established processes to develop and disseminate these types of materials around campus.

Table 4.30 Transition costs to HEPs/SAPs for Standard 7

Size of HEP	Total number of hours for all transition activities per labour resource	Maximum number of labour resources per activity	Average total transition cost per HEP
Small	52	2	$10,000
Medium	46	3	$13,000
Large	40	4	$16,000

Source: Deloitte Access Economics, 2025.

4.5.1.2 Ongoing costs to HEPs/SAPs under Standard 7

Standard 7 imposes a number of ongoing requirements that will lead to recurring costs to HEPs/SAPs. The recurring costs for Standard 7 have been calculated with the assumption that there will be some savings in costs due to similar requirements already in place in HEPs/SAPs through compliance with Standard 3. A key recurring cost of Standard 7 will be to conduct risk assessments and support plans for disclosers and respondents within 48 hours of receiving any disclosure or formal report of GBV, to report on the outcomes to the HEP/SAP, and to manage and monitor any identified risks on an ongoing basis. As a result, it is likely that HEPs/SAPs will have to establish a dedicated, and potentially full-time, skilled team to perform these functions. Risk assessments are also required to be undertaken only by persons who have expertise and experience in GBV risk assessments, working with specific at-risk cohorts, and in GBV and evidence-based practice. To meet this requirement, the HEP/SAP may need to hire new expert staff, provide additional training to current staff, or contract a third-party organisation to conduct risk assessments.

The delivery of tailored GBV prevention and response training and education is expected to incur opportunity costs due to existing staff diverting their productive hours to deliver these courses and for all employees, including leadership, to complete the courses during work hours.

All education and training and other key requirements, such as the student accommodation's Prevention and Response Plan, prevention and response policy, and prevention initiatives and campaigns, require continuous monitoring, review, evaluation, and updates to ensure their effectiveness. This will require a dedicated, skilled monitoring and evaluation team who have the necessary skills in line with the Code, and in-depth understanding of the requirements of the Code. Reviews of the prevention and response policy also must include engagement and collaboration with key stakeholders. This will also require a dedicated and skilled team of staff that have expertise on stakeholder engagement and an understanding of how to appropriately conduct consultations with people with lived experience of GBV.

HEPs/SAPs will also need to require staff to disclose whether they have ever been investigated for or determined to have engaged in conduct that constitutes GBV, and any existing or previous intimate personal relationship with a resident/s. While it is assumed that not all HEPs/SAPs already require staff to make these declarations, it is anticipated that almost all HEPs already require other conflict-of-interest disclosures and have systems that can be adapted to include these additional requirements.

Other ongoing costs will stem from reporting requirements. For example, a dedicated team will be required to collect and report on all data requirements of Standard 6 that apply to student accommodations. Further, HEPs/SAPs will have to dedicate staff to report each year to the Secretary on the names of any student accommodations they own, operate, manage, or are affiliated with, and, if required, to develop a report on how they have complied with their obligations under this standard.

Table 4.31 Ongoing costs to HEPs/SAPs for Standard 7

Size of HEP	Total number of hours for all transition activities per labour resource	Maximum number of labour resources per activity	Average total transition cost per HEP/SAP
Small	85	3	$9,000
Medium	66	4	$10,000
Large	49	5	$10,000

Source: Deloitte Access Economics, 2025.

4.5.1.3 Total cost to HEPs/SAPs under Standard 7

The total costs to HEPs/SAPs as a result of Standard 7 of the Code are $21.0 million (present value over the ten-year analysis period) or $3.3 million on average per year (undiscounted).

Table 4.32 Total costs to HEPs/SAPs for Standard 7

Size of HEP/SAP	Present value over the ten-year analysis period	Average per year (undiscounted)
Small	$260,000	$41,000
Medium	$9.3m	$1.5m
Large	$7.8m	$1.2m

Source: Deloitte Access Economics, 2025.

4.5.2 Costs to student residents

Standard 7 requires that student residents living in student accommodation complete GBV prevention education and training. This will create opportunity costs to students of their personal time spent completing this education and training during their personal time. The cost per student for training is $18.5 per hour. This overall cost is calculated by multiplying the price of their personal time, $37 per hour, by the expected duration of the training per student (30 minutes). This is summarised in Table 4.33 below.

Table 4.33 Total costs to student accommodation students for Standard 7

Size of HEP	Duration of activity per student (hours)	Number of activities per consult	Average total cost per student
Small	0.5	1	$18.5
Medium	0.5	1	$18.5
Large	0.5	1	$18.5

Source: Deloitte Access Economics, 2025.

Similar to standards 1, 2 and 3, and based on the total number of students per student accommodation expected to participate in consultation (assumed to be approximately 2 per cent of all students in the first year of the Code's implementation and 1 per cent in all subsequent years), the total costs to students associated with Standard 7 is $4.0 million (present value over ten years), or approximately $597,000 on average per year (undiscounted).

4.5.3 Costs to SAP staff

Where HEPs/SAPs own and operate student accommodation, it is assumed that the opportunity cost to HEPs/SAPs of the time that those staff members spend undertaking training, submitting the relevant checks or participating in consultation, is already quantified under Standards 1,2 and 3.

However, there are likely to be additional costs imposed on staff members within affiliated student accommodations providers who will now need to ensure that their staff members are compliant with Standards 1 through 6 of the Code. As such the costs per student accommodation staff member is equal to the HEP/SAP staff costs for all other Standards combined (see Table 4.34).

Table 4.34 Total costs to student accommodation staff for Standard 7

Size of HEP/SAP	Duration of activity per student accommodation staff member (hours)	Duration of activity per consult	Average total cost per student accommodation staff member
Small	6	1	$840.0
Medium	8.5	1	$1,190.0
Large	13	1	$1,820.0

Source: Deloitte Access Economics, 2025.

Based on an average of approximately 2,900 staff members employed by affiliated SAPs over the ten-year analysis period, the total estimated cost to these providers (which is ultimately passed on to HEPs/SAPs) is approximately $9.8 million in present value over ten years. This equates to an average annual cost of approximately $1.5 million (undiscounted).

4.6 Cost to the Australian Government

To estimate the total cumulative cost to the Australian Government of introducing the Code, this CBA estimated the number of staff required to administer the Code and their average annual salaries. To do this, the Department of Education provided Average Staffing Level (ASL) figures per employee in the base year and forward estimates until 2027-28. These ASL figures reflect the average number of employees receiving salary or wages per financial year, including adjustments for casual and part-time employees to show the full time equivalent.[255] This is captured in Table 4.35 below. The Department also provided the Australian Public Service (APS) salary rate per role level in the base year and forward estimates until 2027-28, this is captured in below. Because the average salaries for each role level were used in the modelling, as opposed to salary classifications within each level (i.e. EL1.1, EL1.2, EL1.3), there may be slight variations to the final costs for the Australian Government.

Table 4.35 Summary of total number of ASL over the forward estimates

Level	2024-25	2025-26	2026-27	2027-28
SES-1	1	1	1	1
EL2	3	3	3	3

[255] Australian Public Service Commission, 'APS Employment Data 30 June 2021.' (2021) <https://www.apsc.gov.au/employment-data/aps-employment-data-30-june-2021>.

Level	2024-25	2025-26	2026-27	2027-28
EL1	5	5	5	5
APS6	6	7	7	7
APS5	2	3	3	3
APS4	0.5	0.5	0.5	0.5
Total	**17.5**	**19.5**	**19.5**	**19.5**

Source: Department of Education, 2025.

Table 4.36 Summary of individual annual salaries per role level

Level	Base Rate 2024-25	2024-25	2025-26	2026-27	2027-28
APS 4	$82,424	$41,212	$41,861	$42,395	$42,937
APS 5	$89,531	$89,531	$90,940	$92,101	$139,915
APS 6	$105,189	$105,189	$106,845	$108,210	$109,591
EL 1	$129,759	$129,759	$131,802	$133,485	$135,189
EL 2	$164,778	$164,778	$167,371	$169,509	$171,673
SES-1	$245,569	$245,569	$249,434	$252,620	$255,845
Total	**$817,250**	**$776,038**	**$788,252**	**$798,318**	**$855,151**

Source: Department of Education, 2025.

The cost of the Code to the Australian Government also includes costs associated with necessary IT system upgrades and to provide communication and support to the higher education sector. The Department provide estimates of both of these costs indicating that they would create the following costs:

- **IT systems**: $1.7 million over four years from 2024-25
- **travel costs associated with having a physical presence at higher education campuses to educate and support the implementation of the Code**: $0.3 million over four years from 2024-25 and $0.5 million over the medium term to 2034-35
- **cost of sector transition support, marketing, communication, toolkits and best-practice guides (including to guide the design and development of mandatory GBV prevention and response trainings)**: $0.6 million over four years from 2024-25 and 1.1 million over the medium term to 2034-35
- **expert advice and specialist consultations**: $1.9 million over four years from 2024-2025 and $1.5 million over the medium term to 2034-2035.[256]

[256] The timeframe for government costs to occur can vary depending on when the Code is implemented.

4.7 Total costs

Per year, the additional regulatory burden estimated on key stakeholders is $173.2 million on average (undiscounted). In alignment with OIA's Regulatory Burden Measurement Framework, the average annual costs to businesses (including HEPs and HEP staff), community organisations, individuals (students) and government is outlined in Table 4.37. The OIA Regulatory Burden Measurement Framework defines regulatory burden as including costs to individuals, communities and businesses only, as such Australian Government costs of $4.7m have been omitted from the regulatory burden estimates.

Table 4.37 Regulatory burden estimates (RBEs)

Change in costs ($ million)	Business (HEPs and HEP Staff)	Community organisations	Individuals (Students and volunteers)	Total change in costs
Total, by sector	$159.0m	$0m	$14.2m	**$173.2m**

Source: Deloitte Access Economics, 2025.

It is important to note that this CBA only considers the direct cost implications of introducing the Code. As a result, while this CBA estimates the cost to community organisations to be $0, it is acknowledged that if the Code successfully results in an increase in GBV reporting that more victim-survivors (and potentially perpetrators) will seek support that would result in increased pressure and ultimately costs for external GBV and broader mental and physical health support services. This is consistent with the conventional approach in CBA, which accounts for direct impacts and those where there is a higher degree of confidence. Noting that impacts on community organisations would be secondary or indirect impacts, they are considered challenging to estimate with confidence prior to implementation of the Code.

The undiscounted costs per year outlined in Table 4.38 show changes in costs over ten years. The costs change due to several factors including increases in compliance, the reporting of GBV and the number of students and staff. The present value of the total costs is estimated at $1.2 billion, calculated using a 7 per cent real discount rate in accordance with OIA guidelines. This figure reflects the discounted value of the undiscounted costs of $1.8b, which corresponds to total average annual undiscounted costs for approximately $177.9 million.

Table 4.38 Total undiscounted costs per year, 2026-35

Year	Total costs (including government costs) (undiscounted)	Present value of total costs (7% real discount rate)	Regulatory burden (Total costs excluding government costs) (undiscounted)
2026	$124.3m	$116.1m	$119.9m
2027	$103.4m	$90.3m	$98.7m
2028	$124.8m	$101.8m	$120.0m
2029	$153.4m	$117.0m	$148.5m
2030	$181.2m	$129.2m	$176.8m
2031	$193.4m	$128.9m	$188.9m
2032	$206.2	$128.4m	$201.5m
2033	$219.4m	$127.7m	$214.7m
2034	$233.3m	$126.9m	$228.4m
2035	$239.8m	$121.9m	$234.7m
Total (10 years)	**$1.8b**	**$1.2b**	**$1.7b**

Year	Total costs (including government costs) (undiscounted)	Present value of total costs (7% real discount rate)	Regulatory burden (Total costs excluding government costs) (undiscounted)
AVERAGE (undiscounted)	**$177.9m**		**$173.2m**

The total costs to each stakeholder group are outlined in Table 4.39. Standards 2 and 3 are the costliest, making up 22 and 56 per cent of total costs respectively.

Table 4.39 Total costs of the Code in present value over ten years, by stakeholder group (including Australian Government costs)

Stakeholder group	Present value over ten years
HEPs	$754.1m
Students	$71.7m
HEP Staff	$305.9m
Volunteers	$23.7m
Australian Government	$32.7m
Total	**$1.2b**

Source: Deloitte Access Economics, 2025.

Of total costs, 90 per cent of costs are likely to be borne by HEPs (this includes costs to staff, whose time is ultimately an institutional expense). Across all standards, the average transition, and ongoing costs to each HEP is outlined in Table 4.40. This cost differs depending on the size of the provider where the size of the provider is determined by the percentage of total Australian higher education students it provides education to. Average transition costs are additional to the average ongoing costs per provider in the first year of implementation and are associated with system and process upgrades.

Table 4.40 Average cost of Code to HEPs across standards, by HEP size

Provider size	Average transition cost per provider (first year of implementation)	Average ongoing cost per provider (each year over the ten-year period)
Small	$166,000	$231,000
Medium	$254,000	$5.3m
Large	$351,000	$8.1m

Source: Deloitte Access Economics, 2025.

5 Benefits of the Code

This chapter outlines the benefits to key stakeholders as a result of the Code.

5.1 Quantified benefits

This analysis evaluates three distinct benefit streams arising from the implementation of the Code for all students and staff. Each benefit stream is measured in isolation from the others, providing individual estimates of the wellbeing and productivity benefits that can be attributed to the Code's effects. This approach allows these benefits to be combined in the final comparison of benefits and costs.

Given uncertainty regarding the Code's expected effectiveness, breakeven analysis has been used to estimate the minimum level of benefits required for the Code to equal its costs. These estimates represent the benefits needed to ensure that the benefits of introducing the Code at least equal the costs of implementation. However, based on research, it is possible that the actual benefit could exceed these minimum thresholds.

5.1.1 Improved safety to all female students and staff in HEPs

The Code aims to ensure students and staff feel safe regardless of where they study, work, or live.[257] If effective in improving this sense of safety, the Code will generate wellbeing and productivity benefits for all female students and staff regardless of whether they will, or would have, experienced GBV.[258]

For those with existing mental health conditions, the wellbeing benefits of a marginally safer environment are valued at approximately $11,000 per person annually (see section 3.3.2.1).[259,260] This represents the harm avoided for individuals whose mental health could deteriorate as a result of living, working or studying in an environment that is of high psychosocial risk. Psychosocial risks are aspects of the design, management and social context of work and study that have the potential to cause psychological or physical harm. Additionally, regardless of mental health status, all students, staff and volunteers who benefit from a reduction in psychosocial risk will experience productivity gains estimated at $110 per person due to reduced absenteeism and presenteeism (see section 3.3.2.2).

This analysis suggests that improving psychosocial safety for just 1 in 4 students, staff and volunteers would be sufficient to equal the costs of the Code. This threshold represents the minimum level of effectiveness required before the Code can be considered to yield a net benefit even if the only benefit it achieves is an improvement in the sense of safety of students and staff.

The widespread and systematic nature of the Code means that, to some degree, all students could experience improvements in their sense of safety. If this was the case, benefits would exceed this minimum threshold. The estimate is also inherently conservative, as it only focuses on reducing risk from high to medium level rather than reducing risk to lower levels for at least some staff or students. If the Code leads to even greater safety improvements, the total benefits would also be higher. This threshold of an improvement in psychosocial safety for 1 in 4 students, staff and volunteers is therefore considered feasible to achieve through the introduction of the Code.

At this breakeven point, the total economy-wide benefits of improved safety are estimated at approximately $1.2 billion in present value over ten years, with an average annual benefit of approximately $177.9 million. In reality, it is likely that students and staff who do not identify as female would also benefit from broad improvements in safety on campus. Sensitivity analysis has been conducted to determine the additional benefits that may accrue if students and staff of all

[257] Australian Government Department of Education, *Proposed National Higher Education Code to Prevent and Respond to Gender-based Violence 2025* (2025) <https://www.education.gov.au/action-plan-addressing-genderbased-violence-higher-education/resources/proposed-national-higher-education-code-prevent-and-respond-genderbased-violence-2025>

[258] Becher, A, et al, 'Psychosocial Safety Climate and Better Productivity in Australian Workplaces' (2016) *Safe Work Australia* <https://www.safeworkaustralia.gov.au/system/files/documents/1705/psychosocial-safety-climate-and-better-productivity-in-australian-workplaces-nov-2016.pdf>

[259] The Australian Bureau of Statistics (ABS) suggests that approximately one third of the working population has or has had a mental health condition. ABS, 'Mental Health Statistics.' (2018).

[260] This analysis quantifies the benefits to students and staff in cases where the level of psychosocial risk they are exposed to while they study, or work is reduced from high risk to medium risk. This risk level is determined using an assumption that all high education providers are current considered high risk when measuring psychosocial safety climate (PSC). PSC is used to measure worker's workplace safety experience of "policies, practices and procedures for the protection of worker mental health and safety".

genders yielded benefits (see section 6.2.4). Holding effectiveness constant, the additional benefits associated with broader improvements in campus safety to all students and staff could be up to $162 million in present value over ten years. Noting this does not differentiate between students and staff in terms of risk.

5.1.2 Improved responses to disclosures and formal reports of GBV

The Code is also intended to ensure that those affected by GBV receive timely and effective support.[261] Standard 4 in particular ensures that both disclosers and respondents receive safe and person-centred responses and support planning, including mandatory provision or facilitated access to support services. If effective, the Code should reduce the ongoing harm to those students and staff who experience GBV, regardless of whether it occurs on campus. Research suggests that trauma-informed, person-centric responses can lead to improved recovery outcomes for victim-survivors in the future thereby reducing ongoing levels of potential harm.[262,263] Evidence also shows that support for alleged perpetrators can lead to changed behaviours and a reduction in the risk of re-perpetration.[264] Thereby, by facilitating access to support services and services of an accredited specialist as well as disciplinary processes where necessary, the Code should promote behaviour change and an improved sense of accountability among persons using violence, reducing the risk of re-perpetration.

Each disclosure of GBV is associated with a potential ongoing yearly cost of $57,500 for students and $15,000 for staff and volunteers, reflecting the impact on wellbeing, productivity, and educational attainment imposed on individuals by exposure to GBV (see section 3.3.2).

Based on these values and in isolation of all other benefits, if the Code reduces ongoing harm by approximately half (57 per cent) for staff and students who disclose or formally report GBV, the resulting benefits will outweigh the costs. This is regardless of whether the exposure to GBV occurs on or off campus. This means that there must be either:

- a 100 per cent improvement in outcomes for 51 per cent of disclosures or formal reports (or 1 in 2), or
- a 51 per cent improvement in outcomes for 100 per cent of disclosures of formal reports.

This includes a fixed assumption that the rate of disclosure would increase by 2 per cent per year starting from the fourth year of the code's implementation, before plateauing on the ninth year of the ten-year analysis period.[265] This represents the minimum level of improvement required before the Code can be considered to yield a net benefit, even if the only benefit it achieves is an improvement in response to GBV disclosures and formal reports alone.

This breakeven point is more challenging than other effectiveness rates but remains feasible provided that the Code and its requirements are implemented, enforced, and evaluated to a high standard, as intended. While a numerical improvement in recovery rates is unable to be quantified, there is substantial evidence supporting the effectiveness of trauma-based, person-centric support services and improving recovery outcomes.

Based on these improvements, the total economy-wide benefits of enhanced GBV response are estimated at $1.1 billion in present value over ten years, with an average annual benefit of $177.9 million. These benefits reflect reductions in long-term health consequences, improved academic and professional outcomes, and increased productivity.

5.1.3 Prevention of physical and sexual assault on campus

By addressing the drivers of GBV, the Code aims to prevent exposure to GBV.[266] Preventing GBV before it occurs eliminates the long-term harms that can have adverse effects on individuals.[267] This CBA quantifies the avoided costs to individuals in terms of physical and psychological trauma, earnings lost while injured, and lost long-term earning potential. However, due

[261] Australian Government Department of Education, *Proposed National Higher Education Code to Prevent and Respond to Gender-based Violence 2025* (2025) <https://www.education.gov.au/action-plan-addressing-genderbased-violence-higher-education/resources/proposed-national-higher-education-code-prevent-and-respond-genderbased-violence-2025>
[262] Sperlich, M, et al, *Adopting a trauma-informed approach to gender-based violence across the life course. In Understanding gender-based violence: An essential textbook for nurses, healthcare professionals and social workers* (Cham: Springer International Publishing, 2021) 185.)
[263] Chu, Y, et al, 'Outcomes of trauma-informed care on the psychological health of women experiencing intimate partner violence: a systematic review and meta-analysis'(2024) 31(2) *Journal of psychiatric and mental health nursing* 203.
[264] Victorian Government Family Violence Reform Implementation Monitor, *Evidence base for perpetrator interventions* (2023) <https://www.fvrim.vic.gov.au/monitoring-victorias-family-violence-reforms-service-response-perpetrators-and-people-using-violence-within-family/evidence-base-perpetrator-interventions>
[265] Sensitivity analysis has been undertaken on this assumption in Section 6.2.2.
[266] Australian Government Department of Education, *Proposed National Higher Education Code to Prevent and Respond to Gender-based Violence 2025* (2025) <https://www.education.gov.au/action-plan-addressing-genderbased-violence-higher-education/resources/proposed-national-higher-education-code-prevent-and-respond-genderbased-violence-2025>
[267] Peterson, C, et al, 'Systematic review of violence prevention economic evaluations' (2021) 60(4) *American journal of preventive medicine* 552.

to data limitations on the economic impacts of broader forms of GBV, the figures in this section specifically estimate the benefit of preventing cases of physical and sexual assault on campus. Due to this, these figures will likely underestimate the broader benefit of preventing all forms of GBV on campus. Each prevented exposure to physical and sexual assault is expected to result in a benefit of $364,000 if the individual is a student, and $260,000 if the individual is a staff member or volunteer. Based on these values, the results suggest that the benefits of preventing even a small percentage of physical and sexual assault cases on campus are substantial.

Breakeven analysis indicates that if the Code prevents just 1.2 per cent of physical and sexual assault cases on campus (equivalent to approximately 414 cases per year across 211 providers), the benefits would equal the costs of implementation. This threshold represents the minimum level of effectiveness required before the Code can be considered to yield a net benefit, even if the only benefit it achieves is avoided cases of physical and sexual assault. This represents the minimum level of improvement required for the Code to be considered worthwhile based on the prevention of cases of physical and sexual assault alone.

Given existing research showing that targeted GBV interventions in educational settings can reduce sexual violence and bullying by approximately 3 per cent, the actual benefits of prevention could be as much as twice as high as the breakeven point, resulting in up to $2.7 billion (in present value) over ten years.[268] However, given that the Code is the first of its kind in introducing a prescriptive approach to preventing and addressing GBV in higher education settings, there is uncertainty regarding its direct and attributable impacts. As such, the analysis adopts conservative assumptions, particularly in relation to prevention, as this may be the hardest benefit to achieve and/or take the longest to occur.

At this effectiveness rate, the total economy-wide benefits of prevention are estimated at $1.2 billion (present value over ten years), or $177.9 million annually (undiscounted).

5.1.4 Total benefits

The total economy-wide benefits of the Code are derived by combining the individual benefit streams associated with the prevention of physical and sexual assault cases on campus, improved responses to disclosures and formal reports of GBV, and improved safety within HEPs. Each benefit stream represents a distinct yet complementary impact. Prevention addresses harm before GBV occurs, improved responses ensure timely and effective support for those affected by GBV, and improved safety contributes to a more supportive and productive environment for all students and staff. Together, these streams aim to capture the Code's potential to create positive change across higher education, improving wellbeing, productivity, and education outcomes.

Over the ten-year analysis period, it is feasible that the Code could yield benefits of at least $3.5 billion in present value. This translates to approximately $533.7 million in benefits per year on average (undiscounted). It is important to note that, in reality, benefits may take longer to materialise, particularly where system-level change is required to have a real impact. In this case, benefits would be delayed or deferred beyond the analysis period.

These estimates assume that the Code achieves benefits equal to its costs in each of the three benefit areas. There is strong evidence supporting the likely achievement of these levels of effectiveness for two key benefit streams: the prevention of GBV on campus and improved campus safety. Achieving the required levels of effectiveness for improving responses to disclosures (approximately half the harm experienced by staff and students as a result of exposure to GBV is reduced for those who disclose or formally report a case GBV) is more challenging but feasible if, as intended, there is a high standard of implementation, enforcement and ongoing evaluation of the Code and its requirements.

The realisation of these benefits is also considered feasible given the conservative assumptions made for each benefit stream within this analysis and that peer-reviewed studies of similar interventions suggest the potential effectiveness of the Code may be stronger.[269, 270] Further, the actual total benefits are likely to be higher than the quantified estimates in this CBA given the additional benefits that have not been quantified, including the benefits to other individuals who may not identify as female as well as benefits of improvements in women's workforce participation, increased attraction and retention for HEPs and broader improvements in community safety. This also includes benefits to perpetrators of GBV,

[268] Cahill, H., et al. *A social network analysis and implementation study of an intervention designed to advance social and emotional learning and respectful relationships in secondary schools*. Australia's National Research Organisation for Women's Safety (ANROWS, 2023) 95.
[269] Cahill, H., et al. *A social network analysis and implementation study of an intervention designed to advance social and emotional learning and respectful relationships in secondary schools*. Australia's National Research Organisation for Women's Safety (ANROWS, 2023) 95.
[270] Keller, J., et al. 'A 6-week school curriculum improves boys' attitudes and behaviours related to gender-based violence in Kenya' (2017) 32(4) *Journal of interpersonal violence* 535.

including, for example, behaviour change and reduced reoffending, improved relationships, and avoidance of legal consequences.

Table 5.1 Total benefits associated with the introduction of the Code

Benefit stream	Total benefit (PV over ten years)	Average annual benefit
Prevention of physical and sexual assault on campus	$1.2b	$177.9m
Improved responses to disclosures and formal reports of GBV	$1.1b	$177.9m
Improved safety in HEPs	$1.2b	$177.9m
Total benefit	**$3.5b**	**$533.7m**

Source: Deloitte Access Economics, 2025.

This CBA used analysis of break-even points to identify the level of effectiveness required for each benefit stream to yield sufficient benefits to offset the costs of the code. This was done based on the point at which, for each benefit stream, the average annual benefits would exactly offset the average annual costs.

Each benefit stream has a different benefits profile associated with each avoided instance of harm or improvement in outcomes. For example, the prevention of physical and sexual assault on campus accounts only for the avoided costs in the year the assault would have occurred if not for the Code. In contrast, improved responses to disclosures and formal reports of gender-based violence (GBV) capture the ongoing reduction in costs to victim-survivors for each year throughout the analysis period.

This means that, after discounting the forecast benefits for the break-even level of effectiveness for each benefit stream, the present values of the benefits of each stream vary slightly. For example, the present value of the benefits of improved responses to disclosures and formal reports of GBV is slightly lower than the present value of the other two benefit streams, even though all three benefit streams have the same average annual benefit.

5.2 Broader benefits associated with the Code

Compliance with the Code enables HEPs to provide an environment that is safer for staff members and students to work and study. Beyond the direct impacts that have been quantified in this CBA, there are broader social and economic benefits that, while not quantifiable, contribute meaningfully to individuals and society at large. This section explores these broad and indirect benefits in more detail.

5.2.1 Women's participation in the workforce and leadership positions

Addressing GBV within higher education can promote women's educational attainment and subsequent career advancement. Experiences of GBV can severely disrupt a woman's education, leading to decreased academic performance, higher dropout rates and diminished career prospects. Being a victim of intimate partner violence, for example, resulted in negative implications for women's earnings into adulthood. Survivors earned significantly less and experienced significantly less growth in earnings over time as a consequence of lower educational attainment and reduced working hours, when compared with demographically similar women.[271] Educational setbacks not only affect individual women but have broader economic implications, as they limit the diversity and talent available in the workforce.[272]

By implementing effective GBV prevention and response programs, HEPs can create safer learning environments that support women's full participation in education. This in turn, enables women to pursue and complete higher education

[271] Institute for Women's Policy Research, 'Fact Sheet: The Economic Cost of Intimate Partner Violence, Sexual Assault, and Stalking' (2017), *Institute for Women's Policy Research* <https://iwpr.org/wp-content/uploads/2020/10/B367_Economic-Impacts-of-IPV-08.14.17.pdf>
[272] Institute for Women's Policy Research, 'Dreams Deferred: A Survey on the Impact of Intimate Partner Violence on Survivors' Education, Careers and Economic Security.' (2018), *Institute for Women's Policy Research* <https://iwpr.org/dreams-deferred-a-survey-on-the-impact-of-intimate-partner-violence-on-survivors-education-careers-and-economic-security/>

degrees, which are essential for accessing leadership roles and achieving economic independence. Research in Australia and around the world has found that companies with gender balanced leadership teams perform better on average. They deliver greater profits, have stronger talent attraction and retention, achieve higher returns, drive better ESG outcomes, have lower risk profiles, and better credit ratings.[273]

This may extend to increased civic and political engagement by women. When free from the threat of violence and abuse, women are better positioned to engage in community organisations, advocate for policy changes and assume political leadership roles.[274]

Educational attainment is also a key factor in addressing wage disparities between men and women. Studies indicate that education can improve a woman's ability to acquire skills needed for higher-paying jobs, contributing to economic advancement.[275] Women's higher representation in high-skill jobs and elevated education levels can contribute to narrowing the gender-wage gap. Specifically, women's increased presence in such roles has been estimated to raise their earnings relative to men's by approximately 2 cents to the dollar (USD).[276]

5.2.2 Improved student attraction and retention

Prospective students and their families increasingly prioritise safety and a supportive environment when selecting a university.[277,278] Research also shows that women are willing to pay more than men for education that is safer, even if it is of lower quality than other education providers.[279] Therefore, if a HEP is known for providing a safe environment it may be more likely to attract applicants who value a secure and inclusive campus culture.

Students are more likely to remain enrolled and engaged in an environment where they feel secure and supported.[280] Research shows that experiences of sexual harassment and assault can lead to declines in academic achievement and an increased likelihood of students leaving school or transferring.[281,282] By implementing comprehensive GBV interventions, universities can create a supportive environment that encourages students to remain enrolled and engaged. Engaged students are more likely to stay enrolled, graduate on time and succeed in their chosen careers, leading to better outcomes for both students and HEPs.[283,284]

The ability to attract and retain students directly impacts a HEP's financial sustainability. Increased applications can lead to higher enrolment numbers, allowing universities to maintain or grow tuition revenue. Additionally, retaining students reduces the costs associated with the recruitment and orientation of new students.

5.2.3 Increased community awareness and changing social norms

Addressing GBV in HEPs not only enhances safety on campus, but also influences the broader community by increasing awareness and changing societal norms. Implementing GBV prevention programs in higher education settings has been shown to raise awareness about GBV among students. These interventions often aim to challenge stereotypes and improve relationships within the academic community.[285] By promoting values of equality and respect, GBV programs can address

[273]Lim, J, 'Why Chief Executive Women is calling for 40:40:20 targets.' (2024), MBS <https://mbs.edu/news/why-chief-executive-women-is-calling-for-40-40-20-targets#:~:text=%22Research%20in%20Australia%20and%20around,%2C%20and%20better%20credit%20ratings..222>.
[274] International Women's Development Agency, 'Violence Against Women is a Barrier to Women's Leadership' (2018), IWDA <https://iwda.org.au/resource/violence-against-women-is-a-barrier-to-womens-leadership/<
[275] Elsayed, A, et al.,'The women-empowering effect of higher education.' (2023) (163) *Journal of Development Economics* 103101.
[276] Kochhar, R, 'Women's lead in skills and education is helping narrow the gender wage gap' (2020) *PEW Research Centre* <https://www.pewresearch.org/wp-content/uploads/sites/20/2020/01/PST_01.20.30_jobskills_final_report.pdf>
[277] Calitz, A, et al., 'The Influence of Safety and Security on Students' Choice of University in South Africa.' (2019) 24(2) *Journal of Studies in International Education* 269.
[278] Carrico, B, 'The Effects of Students' Perceptions of Campus Safety and Security on Student Enrollment' (2016) *MDS* <https://mds.marshall.edu/etd/1006/>
[279] Borked, G, 'Safety First: Perceived Risk of Street Harassment and Educational Choices of Women' (2018) *Job Market Paper* <https://data2x.org/wp-content/uploads/2019/11/PerceivedRiskStreetHarassmentandEdChoicesofWomen_Borker.pdf>
[280] Weissenstein, S, 'Do I stay or do I go? The Impact of Psychosocial Support Mechanisms on Student Nurses' Decision to Complete Training' (2022) *Tuwhera* <https://openrepository.aut.ac.nz/items/1eeb247e-a065-4319-a69a-020cb6d5af8e>
[281] Hauer, A, 'College Campus Sexual Assault and Retention Rate.' (2019) *The Cupola* <https://cupola.gettysburg.edu/student_scholarship/778/>
[282] Mengo, C, 'Violence Victimization on a College Campus: Impact on GPA and School Dropout' (2016) 18 (2) *Journal of College Student Retention: Research, Theory & Practice* 234.
[283] Krause, K, 'Australian student engagement, belonging, retention and success: a synthesis of the literature.' (2014) *The Higher Education Academy* <https://www.newcastle.edu.au/__data/assets/pdf_file/0007/558871/Australian_student_engagement_lit_syn_2.pdf>
[284] Tight, M, 'Student Retention and Engagement in Higher Education' (2020) 44(5) *Journal of further and Higher Education* 689.
[285] Villardón-Gallego, L et al., 'Early Educational Interventions to Prevent Gender-Based Violence: A Systematic Review' (2023) 11(1) *A systematic review. IN Health Care MDPI* 142.

deeply ingrained beliefs within individuals and social norms within the broader community that contribute to GBV.[286,287] Improving social norms regarding gender-based violence has been found to reduce sexual aggression among college men by changing expectations regarding appropriate behaviour, increasing awareness about conditions of consent, and fostering bystander intervention.[288]

Entrenched norms can contribute to the stigmatisation of survivors, often deterring them from seeking help or reporting incidents. In some cultures, beliefs that prioritise family honour over individual safety can pressure survivors into silence to avoid bringing perceived shame upon their families.[289] Additionally, survivors may experience victim-blaming messages from broader society or internalise stigma as self-blame and shame.[290] Challenging and transforming social norms can reduce the stigma associated with reporting and make it more acceptable for survivors to come forward. Higher reporting rates can ensure that victim-survivors get the support they need and reduce the likelihood of ongoing harm. Reduced barriers to reporting can also allow HEPs to gain a more accurate understanding of the prevalence of GBV on campus, enabling them to allocate resources more effectively towards prevention.

[286] Glass, N et al., 'Evaluating the communities care program: best practice for rigorous research to evaluate gender-based violence prevention and response programs in humanitarian settings' (2018) 12(1) *Conflict and Health* 5.
[287] Perrin, N et al., 'Social norms and beliefs about gender-based violence scale: A measure for use with gender-based violence prevention programs in low resource and humanitarian settings' (2019) 13(1) *Conflict and Health* 6.
[288] Gidycz, C et al. 'Preventing Sexual Aggression Among College Men: An Evaluation of a Social Norms and Bystander Intervention Program.' (2011) 17(6) *Violence against Women* 720.
[289] Nguyen T, 'Rape disclosure: the interplay of gender, culture and kinship in contemporary Vietnam.' (2012) 14 (sup1) *Culture, Health & Sexuality* 39.
[290] Kennedy, A et al., '"I Still Feel Like I Am Not Normal": A Review of the Role of Stigma and Stigmatization Among Female Survivors of Child Sexual Abuse, Sexual Assault, and Intimate Partner Violence' (2016) 19(5) Trauma, Violence & Abuse 512.

6 Summary of impact and conclusion

This chapter summarises the total cost-benefit analysis and impact.

6.1 Primary results

In this CBA, the costs associated with each standard are aggregated and compared to the benefits of the Code as a whole. This is to reflect the fact that the standards are intended to work together to achieve benefits. The difference between the benefits the Code delivers (e.g., incremental benefits and improvements in the form of increased safety and wellbeing) and the cost of additional time, effort and other resources to implement the Code is measured both in terms of net present value (NPV) of the total costs and benefits, as well as the BCR).

The BCR refers to the scale of quantified benefits relative to quantified costs, expressed in the form of a ratio (where benefits are divided by costs). A BCR greater than one indicates that the quantified benefits related to the Code are greater than quantified costs (or, for every $1 of cost incurred, a benefit of greater than $1 is achieved). As such, any BCR that is equal to or greater than one can be expected to result in a positive impact in aggregate.

This CBA indicates that, even when considering just two of the three quantified benefit streams (prevention of physical and sexual assault on campus and broader safety improvements for all female students and staff), the Code is likely to achieve a BCR of at least 2. If the third benefit stream (improved responses to disclosed cases of GBV) is also realised, it is considered feasible that the Code could achieve a BCR of 3. This outcome would be dependent on effective implementation, robust compliance monitoring, and regular evaluation to ensure strong recovery outcomes in response to disclosures.

When accounting for additional potential benefits, including impacts on staff and students who do not identify as female (see section 6.2.4 below), and other unquantifiable benefits (for example, increased participation in the workforce and leadership positions) (see section 5.2), the BCR for the Code is considered likely to exceed 3. This is supported by evidence from literature and research on the scale of impact that broadly similar interventions have been able to achieve (see section 5.1).

In total, the results of the CBA suggest that the Code is likely to create a net benefit of approximately $2.3 billion in net present value over ten years, or approximately $355.8 million per year (on average).

Table 6.1 Primary CBA results

	Net impact (present value over ten years)	Average annual (undiscounted)
Total costs	$1.2b	$177.9m
Total benefits	$3.5b	$533.7m
Net benefit	**$2.3b**	**$355.8m**
BCR	**3.0**	**3.0**

Source: Deloitte Access Economics, 2025.

6.1.2 Likelihood of achieving benefits

Importantly, research suggests that each benefit is not only feasible but likely to be achieved with potential benefits exceeding the breakeven estimates. The breakeven thresholds used in this analysis present the minimum levels of effectiveness required for the Code to equal its costs. Research also suggests that actual benefits may be higher. For

instance, research on different GBV interventions in education settings has demonstrated measurable impacts on both prevention and response, with some intervention effects exceeding the level required to break even by approximately threefold. For example, for the benefits associated with the prevention of GBV to be achieved, a reduction of approximately 1 per cent of GBV cases on campus is required. Some studies suggest that GBV interventions can reduce cases of sexual violence and bullying by approximately 3 per cent.[291] Sensitivity analysis has been undertaken in section 6.2 to demonstrate the dependencies of these results on key assumptions.

Although no existing policy fully captures the depth and complexity of the Code and its objectives, international programs addressing specific impacts, such as the value of training and mental health improvements, offer relevant comparisons (see Table 6.2). These programs report BCRs ranging from 4 to 100, with an estimated 90 per cent likelihood (on average) that benefits will outweigh costs.[292] Within this context, a BCR of three for the Code is considered feasible, given this reflects a conservative effort or the minimum level of benefits that may be achieved. This analysis suggests that the Code's benefits are likely to exceed its costs by more than three times.

Table 6.2 Benefits-Cost Ratios of other programs/policies implemented worldwide

Program name and description	Benefits to Cost ratio (BCR)
Value of training	
Vocational and employment training for court-involved youth Vocational and employment training includes a combination of vocational skills training, academic education or tutoring, and job search assistance or placement programs. These programs aim to support positive outcomes to reduce recidivism, specifically steady, long-term employment and educational attainment. Vocational skills training uses classroom-based job training to teach youth employable skills. As part of some training curriculums, youth can receive certification in a variety of specialties. For programs that focus on job search assistance, youth participate in interview preparation, resume building, or job placement services aided by community volunteers. Commonly, job assistance programs provide total or subsidised wages which offer an additional incentive to employers in the community to work with youth.	4.15
Employment counselling and job training Employment counselling and job training programs teach skills necessary for seeking employment after incarceration. These include both hard skills (e.g., job preparedness and skills training) and soft skills, (e.g., effective job searches, applications, and resumes). These programs may be sequential, where participants first undergo job training and then receive work experience or follow individualised employment plans. Participants may also receive employment placement assistance from a specialist. Some programs may also specifically address barriers to employment for convicted persons.	14.41
Moving on Moving On is a gender-responsive program focused on developing existing strengths, improving communication skills, and building healthy relationships. The curriculum includes discussion, self-assessments, writing, role-playing, and modelling exercises based on cognitive behavioural therapy, relational theory, and motivational interviewing. Lessons are organised into nine modules: Setting the context for change, women in society, taking care of yourself, relationships, coping with emotions and harmful self-talk, problem-solving, becoming assertive, and moving on. Small groups of women meet with a trained facilitator for 26 sessions (48 hours of classroom time) over 12 weeks. Study participants volunteered for the program.	11.64

[291] Cahill, H., et al. *A social network analysis and implementation study of an intervention designed to advance social and emotional learning and respectful relationships in secondary schools*. Australia's National Research Organisation for Women's Safety (ANROWS, 2023) 95.
[292] Graham, J, et al, 'Co-Benefits, Countervailing Risks, and Cost-Benefit Analysis' (2024) 2 *Human and Ecological Risk assessment: Theory and Practice 1167.*

Program name and description	Benefits to Cost ratio (BCR)
Mental health	
Seeking Safety Seeking Safety is a cognitive-behavioural therapeutic program for individuals with co-occurring post-traumatic stress disorder (PTSD) and substance use disorder. The program is intended to improve participants' mental health (reduce PTSD and depression) and to improve interpersonal and coping skills. The Seeking Safety curriculum includes psychoeducation regarding the consequences of trauma and the links between trauma and substance use; addresses cognitive, behavioural, and interpersonal topics; and teaches specific coping skills. Small groups meet with a trained facilitator for 24 two-hour sessions over 6-12 weeks.	81.88
Acceptance and Commitment Therapy for adult anxiety Acceptance and Commitment Therapy for anxiety aims to increase client acceptance of negative thoughts and feelings and to reduce the negative behavioural impact of anxiety. Acceptance and Commitment Therapy relies on six core processes of change: 1) acceptance; 2) learning to view thoughts as hypotheses rather than facts, 3) being present, 4) viewing the self as context for experience, 5) identifying core values, and 6) acting based on those values. These core principles are applied through various exercises and homework. Treatments in this review provided 7 to 18 hours per client of either group or individual therapy in an outpatient setting. Comparison groups were either on a waitlist for treatment or received treatment as usual. This review excludes studies of acceptance and commitment therapy for other disorders.	61.42
Cognitive behavioural therapy (CBT) for adult posttraumatic stress disorder (PTSD) Treatments in this review include several components, such as psycho education about posttraumatic stress disorder (PTSD), relaxation and other techniques for managing physiological and emotional stress, exposure (the gradual desensitisation to memories of the traumatic event), and cognitive restructuring of inaccurate or unhelpful thoughts. The studies in this review employed a number of trauma-specific treatment models, including Prolonged Exposure Therapy (PE), Narrative Exposure Therapy (NET), and Cognitive Processing Therapy (CPT). In the studies in this review, treatments were provided between 1-45 therapeutic hours per client in individual or group settings. Studies were conducted on all continents, and subjects had experienced one of a variety of types of trauma, including terrorism, sexual or physical assault, domestic violence, war, political detention, and automobile accidents.	101.97

Source: Washington State Institute for Public Policy, 'Benefit-Cost Results' (2024)

Summary of underlying assumptions

The modelling results are underpinned by several key assumptions that shape the estimated costs and benefits of the Code (see Appendix C). These assumptions are informed by the Department's Expert Reference Group and align with best practice CBA guidelines, including the Australian Government Guide to Policy Impact Analysis. These assumptions relate to:

- **compliance**: partial and growing compliance over time across the 211 HEPs, as well as affiliated student accommodation
- **variation based on provider size:** unit cost estimates and compliance rates scale according to the size of each HEP, reflecting variation in the volume of activity, risk profile, and availability of financial and labour resources
- **existing effort undertake by HEPs to manage GBV under the base case:** attribution factors reduce costs based on stakeholder insights that some HEPs may already have relevant infrastructure and resources in place that align with, or contribute to, compliance with multiple standards of the Code (this includes existing governance frameworks, IT systems, training platforms, and education technology specialists)
- **data limitations:** where robust data is not available, such as the prevalence of GBV, the model draws on sector-wide averages for key variables
- **quantification of direct impacts only**: estimated benefits incorporate only direct and quantifiable impacts for female students and staff – indirect and unquantified effects such as reduced pressure on support services, benefits to broader

cohorts, and long-term cultural change are excluded from the analysis, so the estimated benefits are likely to be conservative in this regard.

Taken together, these assumptions have been designed to provide a credible estimate of regulatory impact. In areas of uncertainty, conservative assumptions have been applied. This is particularly the case in relation to benefit estimation and the estimation of existing provider capabilities. This means the analysis is more likely to understate rather than overstate the potential net benefits of implementation. While this approach strengthens the reliability of results, it also means that the full social and economic value of the reforms may be higher than reported. Equally, if key assumptions (such as compliance or effectiveness) are not realised in practice, actual costs may be higher. These limitations should be considered when interpreting the results and their implications for implementation.

6.2 Sensitivity analysis of economy-wide costs

Sensitivity analysis has been conducted on attribution factors, discount rates, effectiveness rates, compliance rates, declarations of GBV from employees, and the time and labour used to set up processes relating to the GBV and working with children checks. The summary tables below demonstrate that the results of the analysis are not highly sensitive to the attribution factors or the discount rate, as benefits and costs scale accordingly on both sides, resulting in similar net benefits and BCRs regardless of whether lower or higher attribution factors and discount rates are chosen. Similarly, when changes are made to the compliance rates, declarations of GBV from employees or the time and labour used to set up processes relating to GBV and working with children checks, the corresponding summary tables also demonstrate that the analysis is not highly sensitive to those factors.

The effectiveness rates, on the other hand, do impact the net benefits and the BCRs, with changes to any of the three effectiveness rates (prevention, response, and cumulative wellbeing) causing subsequent changes to benefits, net benefits and the BCR.

As the effectiveness rates drive benefits, this analysis is highly sensitive to the effectiveness rates assumptions. Any increases in the effectiveness rates will result in a BCR above 3, however, if one or more of the break-even effectiveness rates are not achieved, a BCR of less than 3 will occur. However, as all three benefit components are cumulative, even incremental variations in their effectiveness still result in total benefits outweighing costs and a BCR of greater than one.

6.2.1 Changes in attribution factors

Sensitivity analysis on attribution rates has been undertaken on the economy-wide costs in Table 6.3. Given the break-even approach taken in this CBA, the economy-wide benefits are equal to these costs by definition. The results of this sensitivity analysis suggest that the costs of the proposed reform options are marginally sensitive to the attribution factor. This is because attribution impacts the scale of both costs and benefits.

The attribution factor is applied to the costs to ensure only the additional costs that HEPs will incur following the Code's implementation are counted. It is assumed that HEPs are currently undertaking some of the activities that will be required of them under the Code, and as such, will not encounter the full costs of the Code. Variations in the attribution rate have been applied across small, medium, and large HEPs, with a larger attribution factor being applied to medium and large HEPs, under the assumption that they are undertaking a greater number of activities required under the Code. A lower attribution factor assumes that more HEPs have already undertaken activities compliant with the Code (and so would not incur additional costs of new activities and do not realise additional benefits from improvements) than in the central scenario. A higher attribution factor assumes the reverse, and so results in higher costs as well as higher benefits.

When the attribution factor is increased by 10 per cent (across small, medium and large HEPs), the total costs associated with the proposed reforms are approximately $300 million more than the modelled scenario. Alternatively when the attribution factor is decreased by 10 per cent (across small, medium and large HEPs), the total costs associated with the proposed reforms are approximately $300 million less than the modelled scenario.

The results of this sensitivity analysis suggest that the BCR is marginally sensitive to the attribution factor, with costs and benefits scaling together. However, the overall scale of impact does change as a result. Greater costs and benefits occur as a result of the higher attribution rate, resulting from the impact of HEPs undertaking more of the activities required under the Code. While a lower attribution factor implies that more HEPs are already implementing best practices under the base case that align with the Code's requirements, resulting in lower incremental costs to the base case, as fewer activities are needed to achieve best practice. However, it also reduces the number of students and staff who will benefit, resulting in a larger reduction in overall benefits.

Table 6.3 Sensitivity CBA results with changes in the attribution factor

	Present value over ten years (10 per cent lower)	Present value over ten years (central)	Present value over ten years (10 per cent higher)
Total costs	$871m	$1.2b	$1.5b
Total benefits	$2.6b	$3.5b	$4.5b
Net benefit	**$1.7b**	**$2.3b**	**$3.0b**
BCR	**3.0**	**3.0**	**3.0**

Source: Deloitte Access Economics, 2025.

Note: When rounding, the BCRs between the central and low and high scenarios remain the same however, in reality, there is a small marginal difference in BCRs as a result of changes in the attribution factor.

6.2.2 Changes in disclosure rates

Sensitivity analysis on disclosure rates has been undertaken on the economy-wide costs in Table 6.4. The results of this sensitivity analysis suggest that the costs of the proposed reform options are sensitive to the disclosure rate. The central scenario assumes that disclosure rates would increase from 3 per cent in the base case to 15 per cent by year 10. When the disclosure rate is increased to reach 20 per cent by year 10 (beginning from 3 per cent in year 1, and then increasing by 2 per cent every year until reaching 20 per cent and then plateauing), the total costs associated with the proposed reforms are approximately $100 million more than the modelled scenario.

Alternatively, when the disclosure rate is increased to 30 per cent by year 10 (beginning from 3 per cent in year 1, and then increasing by 3 per cent every year until reaching 30 per cent year 10), the total costs associated with the proposed reforms are approximately $200 million more than the modelled scenario.

Alongside the rise in costs, both the total benefits and net benefits also increase as a result of higher disclosure rates. This reflects the fact that the expected benefits generated from each additional disclosure outweigh the associated costs of service provision. As a result, net benefits rise alongside higher disclosure rates.

Table 6.4 Sensitivity CBA results with a higher disclosure rate (20 per cent by year 10 and 30 per cent by year 10)

	Present value over ten years (central)	Present value over ten years (20 per cent disclosure rate by year 10)	Present value over ten years (30 per cent disclosure rate by year 10)
Total costs	$1.2b	$1.3b	$1.4b
Total benefits	$3.5b	$4.0b	$4.6b
Net benefit	**$2.3b**	**$2.7b**	**$3.2b**
BCR	**3.0**	**3.2**	**3.4**

Source: Deloitte Access Economics, 2025.

6.2.3 Changes in discount rates

It is considered best practice to undertake sensitivity analysis on the discount rate given there is general uncertainty about the appropriate discount rate to use for regulatory proposals.[293] The Australian Government recommends a discount rate of 7 per cent which has been applied in this analysis as the central scenario. The Australian Government recommends sensitivity analysis of the net present value using discount rates of 3 and 10 per cent.

Sensitivity analysis on discount rates has been undertaken on impacts in Table 6.5. The results of this sensitivity analysis suggest that while changes to the discount rate influence the total estimated cost and benefits, they have only a marginal effect on the BCR. This is because benefits and costs are proportionately linked through the break-even approach used in this CBA, so they tend to scale together as a result of discounting.

When the discount rate is reduced to 3 per cent, the total costs associated with the proposed reforms are approximately $300 million more than the modelled scenario. Alternatively, when the discount rate is increased to 10 per cent, the total costs associated with the proposed reforms are approximately $200 million less than the modelled scenario.

Table 6.5 Sensitivity CBA results with a discount rate of 3 per cent and 10 per cent

	Present value over ten years (3 per cent discount rate)	Present value over ten years (central – 7 per cent discount rate)	Present value over ten years (10 per cent discount rate)
Total costs	$1.5b	$1.2b	$1.0b
Total benefits	$4.4b	$3.5b	$3.0b
Net benefit	**$3.0b**	**$2.3b**	**$2.0b**
BCR	**3.0**	**3.0**	**3.0**

Note: When rounding, all BCRs remain the same but, in reality, there is a small marginal difference in BCRs as a result of changes in the discount rate.

Source: Deloitte Access Economics, 2025.

6.2.4 Changes in beneficiaries of wellbeing benefits

Sensitivity analysis on the cohorts of students and staff who are expected to benefit from the Code has been undertaken in Table 6.6. The central scenario only focuses on the benefits to women, given that research suggests they are generally at higher risk of GBV. However, it is possible that the Code will benefit students and staff of other genders, where the Code may contribute to increasing broader levels of safety within HEPs. In this sensitivity test, students and staff of other genders have been added to the number of those expected to yield broader wellbeing benefits. The results of this sensitivity analysis suggest that if the effectiveness rate is held constant at 24.25 per cent, and students and staff of all genders are included, the additional benefits associated with broader improvements in campus safety could be up to $162 million in present value over ten years.

Viewed differently, spreading benefits across a greater cohort of students and staff will lower the required effectiveness rate from 24.25 per cent to 21.89 per cent (Table 6.6).

Table 6.6 Sensitivity CBA results including men and women in the wellbeing benefit

	Present value over ten years (includes women and men in the wellbeing benefit)	Present value over ten years (central – includes women only in wellbeing benefit)
Prevention effectiveness rate	0.7 per cent	1.2 per cent

[293] Department of the Prime Minister and Cabinet Office of Best Practice Regulation, 'Guidance Note: Cost-benefit Analysis' (2023) <https://oia.pmc.gov.au/sites/default/files/2023-08/cost-benefit-analysis.pdf>

Response effectiveness rate	50.12 per cent	50.95 per cent
Cumulative wellbeing effectiveness rate	21.89 per cent	24.25 per cent

Source: Deloitte Access Economics, 2025.

6.2.5 Changes in effectiveness rates

Sensitivity analysis on effectiveness rates has been undertaken on the economy-wide impacts in Table 6.7, Table 6.8, Table 6.9, and Table 6.10. Given the break-even approach taken in this CBA, the economy-wide benefits are equal to these costs by definition in the central scenario. The results of this sensitivity analysis suggest that the benefits of the proposed reform options are highly sensitive to the effectiveness rates.

When only the prevention effectiveness rate is increased to 3 per cent from 1.2 per cent and the response and wellbeing effectiveness rates remain the same, the increase in benefits is $1.7 billion, as research suggests that prevention effectiveness could be as high as 3 per cent. When compared to the results from changes in the other effectiveness rates, changes to the prevention effectiveness have the largest effect on the net benefit and BCR. Decreases to the prevention effectiveness rate to 0.5 per cent from 1.2 per cent result in significant decreases to benefits and an overall lower net benefit.

Table 6.7 Sensitivity CBA results with changes to the prevention effectiveness rate

	Present value over ten years (0.5 per cent prevention effectiveness rate)	Present value over ten years (central – 1.2 per cent effectiveness rate)	Present value over ten years (3 per cent prevention effectiveness)
Total costs	$1.2b	$1.2b	$1.2b
Total benefits	$2.8b	$3.5b	$5.2b
Net benefit	**$1.6b**	**$2.3b**	**$4.0b**
BCR	**2.4**	**3.0**	**4.4**

Source: Deloitte Access Economics, 2025.

When the response effectiveness rate is increased to 61 per cent from 51 per cent and the prevention and wellbeing effectiveness rates remain the same, the increase in benefits is approximately $200 million. When compared to the results from changes in the other effectiveness rates, changes to the response effectiveness have a minor impact on the net benefit and BCR. Decreases to the prevention effectiveness rate to 41 per cent from 51 per cent results in decreases to benefits and an overall lower net benefit.

Table 6.8 Sensitivity CBA results with response effectiveness changes

	Present value over ten years (41 per cent response effectiveness rate)	Present value over ten years (central)	Present value over ten years (61 per cent response effectiveness)
Total costs	$1.2b	$1.2b	$1.2b
Total benefits	$3.3b	$3.5b	$3.7b
Net benefit	**$2.1b**	**$2.3b**	**$2.6b**

BCR	**2.8**	**3.0**	**3.2**

Source: Deloitte Access Economics, 2025.

When the cumulative wellbeing effectiveness rate is increased to 34 per cent from 24 per cent and the prevention and response effectiveness rates remain the same, the increase in benefits is $500 million. When compared to the results from changes in the other effectiveness rates, changes to the wellbeing effectiveness have a relatively small effect on the net benefit BCR. Decreases to the cumulative wellbeing effectiveness rate to 14 per cent from 24 per cent also results in decreases to benefits and an overall lower net benefit.

Table 6.9 Sensitivity CBA results with cumulative wellbeing effectiveness changes

	Present value over ten years (14 per cent wellbeing effectiveness rate)	Present value over ten years (central – 24 per cent wellbeing effectiveness rate)	Present value over ten years (34 per cent wellbeing effectiveness rate)
Total costs	$1.2b	$1.2b	$1.2b
Total benefits	$3.0b	$3.5b	$4.0b
Net benefit	**$1.8b**	**$2.3b**	**$2.9b**
BCR	**2.6**	**3.0**	**3.4**

Source: Deloitte Access Economics, 2025.

When the effectiveness rates increase for prevention (3 per cent from 1.2 per cent), response (61 per cent to 51 per cent) and cumulative wellbeing (34 per cent from 24 per cent), the total benefits associated with the proposed reforms are approximately $2.5 billion more than the modelled scenario. Changes to the net benefit and BCR are primarily driven by the changes to the prevention effectiveness rate, whereas the response and cumulative wellbeing effectiveness rates only have a marginal effect on the net benefit and BCR. Decreases to the effectiveness rates for prevention (0.5 per cent from 1.2 per cent), response (41 per cent from 51 per cent) and cumulative wellbeing (14 per cent from 24 per cent) result in significant decreases in benefits compared to the central scenario (almost half).

Table 6.10 Sensitivity CBA results with changes to prevention effectiveness, response effectiveness, and cumulative wellbeing effectiveness

	Present value over ten years (decrease in all effectiveness rates)	Present value over ten years (central)	Present value over ten years (increase in all effectiveness rates)
Total costs	$2.1b	$1.2b	$1.2b
Total benefits	$1.8b	$3.5b	$6.0b
Net benefit	**$906m**	**$2.3b**	**$4.9b**
BCR	**1.8**	**3.0**	**5.0**

Source: Deloitte Access Economics, 2025.

6.2.6 Changes in compliance rates

Sensitivity analysis on compliance rates has been undertaken on the economy-wide costs in Table 6.11. The results of this sensitivity analysis suggest that the costs of the proposed reform options are marginally sensitive to the compliance rate. The

central scenario assumes that compliance rates would plateau by year 5 of the analysis for small and medium providers at 69 per cent and 77 per cent respectively, whilst large providers reach 100 per cent. When the compliance rate is increased for small and medium providers, such that it gradually increases by 10 per cent each year until 100 per cent compliance is reached by year 7 of the analysis, the total costs associated with the proposed reforms are approximately $100 million more than the modelled scenario.

Table 6.11 Sensitivity CBA results with increases in compliance rate to 100 per cent for all providers

	Present value over ten years (central)	Present value over ten years (increase in compliance rates)
Total costs	$1.2b	$1.3b
Total benefits	$3.5b	$3.8b
Net benefit	**$2.3b**	**$2.5b**
BCR	**3.0**	**2.9**

Source: Deloitte Access Economics, 2025.

6.2.7 Reduction in the time and labour to conduct GBV checks

Sensitivity analysis on compliance rates has been undertaken on the economy-wide costs in Table 6.12. The results of this sensitivity analysis suggest that the costs of the proposed reform options are not sensitive to the time and labour providers spend to conduct GBV checks. The central scenario assumes that small, medium and large providers each spend five, four and three hours respectively setting up the process to conduct GBV checks, with small, medium and large providers using one, two or three labour resources respectively. When the time and labour to conduct GBV checks is reduced for small, medium and large providers to two hours each and the number of labour resources is reduced to one for all providers, total costs associated with the proposed reforms remain almost identical, with only a minor decrease occurring compared to the modelled scenario.

Table 6.12 Sensitivity CBA results with a reduction in the time and labour spent to conduct GBV checks

	Present value over ten years (central)	Present value over ten years (increase in compliance rates)
Total costs	$1.2b	$1.2b
Total benefits	$3.5b	$3.5b
Net benefit	**$2.3b**	**$2.3b**
BCR	**3.0**	**3.0**

Note: When rounding, total costs remain the same but, in reality, there is a small marginal difference in total costs as a result of changes in the time and labour spent on GBV checks.

Source: Deloitte Access Economics, 2025.

6.2.8 Reduction in the time and labour for working with children checks

Sensitivity analysis on compliance rates has been undertaken on the economy-wide costs in Table 6.13. The results of this sensitivity analysis suggest that the costs of the proposed reform options are not sensitive to the time and labour providers spend to conduct working with children checks. The central scenario assumes that small, medium and large providers each spend five, four and three hours respectively to setting up process to conduct working with children checks, with small, medium and large providers using one, two or three labour resources respectively. When the time and labour to conduct working with children checks is reduced for small, medium and large providers to two hours each and the number of labour

resources is reduced to one for all providers, total costs associated with the proposed reforms remain similar with only a minor decrease occurring compared to the modelled scenario.

Table 6.13 Sensitivity CBA results with a reduction in the time and labour spent to conduct working with children checks

	Present value over ten years (central)	Present value over ten years (increase in compliance rates)
Total costs	$1.2b	$1.2b
Total benefits	$3.5b	$3.5b
Net benefit	**$2.3b**	**$2.4**
BCR	**3.0**	**3.0**

Note: When rounding, total costs remain the same but, in reality, there is a small marginal difference in total costs as a result of changes in the time and labour spent on working with children checks.

Source: Deloitte Access Economics, 2025.

6.2.9 Reduction in the number of employees who make a GBV declaration

Sensitivity analysis on compliance rates has been undertaken on the economy-wide costs in Table 6.14. The results of this sensitivity analysis suggest that the costs of the proposed reform options are marginally sensitive to number of employees who make a GBV declaration. The central scenario assumes that 20 per cent of employees make a GBV declaration. When the per cent of employees who make a declaration is reduced to 10 per cent, the total costs associated with the proposed reforms are approximately $60 million more than the modelled scenario.

Table 6.14 Sensitivity CBA results with a reduction in the number of employees who make a GBV declaration

	Present value over ten years (central)	Present value over ten years (increase in compliance rates)
Total costs	$1.2b	$1.1b
Total benefits	$3.5b	$3.5b
Net benefit	**$2.3b**	**$2.3b**
BCR	**3.0**	**3.2**

Note: The total figures presented in this table are rounded.

Source: Deloitte Access Economics, 2025.

6.3 Implementation considerations

The realisation of net benefits will depend upon the effective implementation of the Code. Stakeholder consultations have highlighted the need for adequate support, clear definitions and requirements, and timeframes. Stakeholders expressed uncertainty about the definition and scope of certain terms in the Code and their practical implications. Key examples of this include:

- Some stakeholders expressed uncertainty about the full extent of what constitutes **gender-based violence**. While all stakeholders recognised that sexual assault and harassment are included, there was some ambiguity around what other forms of violence fall under this category.
- The scope of the term **staff** in the Code and specifically whether this includes temporary, third-party, or contracted employees, particularly in regard to GBV education and training requirements. Differentiation between requirements

for different staff has practical implications on costs, for example where back of office staff are required to obtain Working with Children Checks regardless of whether they will be interacting with students directly.
- Additionally, there was a lack of clarity about what a **whole-of-organisation approach** meant and what practical actions providers would be required to take to comply.

Other stakeholders noted that the effectiveness of the Code will depend on the interrelated nature of the standards and how they work together in practice. For example, some higher education providers noted that the intended use of deidentified data remains unclear, particularly how it will inform other improvements in support services and campus safety initiatives. This underscores the complexity of implementation, as the overall strength of the Code is contingent on the effective execution of each of its standards.

These elements will be critical in ensuring effort by stakeholders (and associated costs) are not disproportionate to what is required to comply with the Code and to ensure that best practices are adopted with the best chance of realising the potential benefits. To this degree, ongoing engagement with HEPs while implementing the Code will be essential to its success.

Appendix A Themes from stakeholder consultation

To inform the results of this CBA, Deloitte Access Economics conducted stakeholder consultations with five higher education providers within the Department's Expert Reference Group. The purpose of these consultations was to inform the report's understanding and analysis of how higher education institutions may respond to the Code and the costs required to comply. More specifically, stakeholders were asked to provide information on the following items:

- whether the requirements of the Code may already be being met (or would be likely to be met in future) through existing resources, policies and practices, or regulatory requirements other than the Code
- if additional resources (e.g. time spent by employees, or new IT systems) will be needed to meet the requirements of National Code
- any additional information on actions higher education providers expect they may need to take to respond and comply with National Code (and their effects on students and staff).

Consultations were held with representatives from five higher education providers across Australia. These providers were supplied by the Department of Education and are members of a broader consultation group previously engaged by the department. As a result, these representatives already had an in-depth understanding of the Code and the requirements of each standard prior to the consultation. Each consultation had a duration of one hour. The views of each stakeholder are aggregated and will not be identified for the purposes of privacy to facilitate open discussion.

Given this report was only able to engage with a limited number of providers, it cannot be determined with certainty whether the views of these stakeholders reflect the experiences and perspectives of the sector more broadly. A particular gap was the inclusion of the views of small providers. Consequently, in future this report would recommend further consultations with more providers.

Across the five consultations, several key themes were heard across the costs of the Code to higher education providers, the benefits to students, staff, and the providers as institutions, as well as the perceived risks and uncertainties. The following common themes emerged across the five consultations:

1. Across each consultation it was clear that there is significant variation across different providers in the extent to which providers already have internal policies and procedures in place that will meet or largely meet the requirements of the Code. Consequently, while some providers consider that they are already largely compliant with the Code, it is also expected that there are providers that will need to spend significant time and resources updating or developing new systems, policies, and procedures.
2. While no single standard stood out as the costliest, stakeholders commonly suggested that standards that create requirements around embedded systems tend to be more expensive than those focused on policies or procedures. Specifically, standards with detailed procedural requirements impacting many students and staff are expected to incur the highest costs. Common examples highlighted by stakeholders include the requirements around the delivery of GBV education and training, case management processes, and the scale of data collection.
3. All stakeholders interviewed agreed that, at least to some extent, the requirements of the Code will enhance the wellbeing of students and staff. However, overall, there was limited discussion about the specific benefits of each requirement. This was because representatives generally had clearer scope over how these requirements will impact their organisation's operations and costs, than with the broader benefits to wellbeing that could be realised.
4. Stakeholders expressed concern that the requirement in Standard 6 to collect demographic data from disclosers and respondents might unintentionally discourage people from coming forward. It was suggested that victim-survivors may perceive theses request as a risk to their anonymity and safety, potentially deterring them from making a disclosure or formal report out of fear of retaliation or other negative consequences. However, stakeholders did explain that they were unsure whether this requirement, would allow disclosers the option of not disclosing certain information.
5. Stakeholders expressed uncertainty about the definition and scope of certain terms in the Code and their practical implications. Key examples of this include:

- Some stakeholders expressed uncertainty about the full extent of what constitutes **gender-based violence**. While all stakeholders recognised that sexual assault and harassment are included, there was some ambiguity around what other forms of violence fall under this category.
- The scope of the term **staff** in the Code and specifically whether this includes temporary, third-party, or contracted employees, particularly in regard to GBV education and training requirements.
- Additionally, there was a lack of clarity about what a **whole-of-organisation approach** meant and what practical actions providers would be required to take to comply.

Appendix B Evidence of problem, size of at-risk cohorts and scale of potential impact

Table B.1 Key modelling inputs and data points

Evidence	Indicative estimate	Source
Prevalence rate of sexual harassment	16.1 per cent of Australian university students have been sexually harassed since they started university (2021 estimate)	National Student Safety Survey
Prevalence rate of sexual assault	4.5 per cent of Australian university students have been sexually assaulted since they started university (2021 estimate)	National Student Safety Survey
Number of full-time equivalent staff working in higher education	143,268.1 (2024 estimate)	Commonwealth Department of Education
Number of students enrolled in higher education (domestic and overseas)	1,600,563 (2023 estimate)	Commonwealth Department of Education
Rate of students who experienced sexual harassment and made formal complaints to the university	3 per cent (2021 estimate)	National Student Safety Survey
Rate of students who experienced sexual assault and made formal complaints to the university	5.6 per cent (2021 estimate)	National Student Safety Survey
Rate of students who sought support from their university after experiencing sexual harassment	16.8 per cent (2021 estimate)	National Student Safety Survey
Rate of students who sought support from their university after experiencing sexual assault	25.5 per cent (2021 estimate)	National Student Safety Survey
Rate of students who know nothing or very little about the formal reporting process for sexual harassment.	51 per cent (2021 estimate)	National Student Safety Survey

Rate of students who know nothing or very little about the formal reporting process for sexual assault.	53.6 per cent (2021 estimate)	National Student Safety Survey

Appendix C Cost modelling assumptions

In modelling the costs, several key assumptions were required due to limitations in data. The following table lists assumptions.

Table C.1 Key assumptions used in CBA modelling

Assumption	Description of the assumption	Sources used
Sector split of small, medium and large providers	This analysis has split Australian University providers into small, medium and large based on the number of student enrolments. Providers which had enrolment numbers that represented approximately between 3-5 per cent of all students enrolled in higher education were considered large providers, whereas providers which had approximately 1-2 per cent of all students enrolled in higher education were considered medium providers. Providers which had less than 1 per cent of all students enrolled in higher education were considered small providers. Providers classified as Institutes of Higher Education and University Colleges, by the TEQSA were all considered small providers.	The Department's Student Data and TEQSA
Number of providers in the sector	The number of providers in the sector is assumed to remain the same across the ten years of analysis.	TEQSA
Number of students in the sector	Using historical data, it is assumed that the number of students in the sector will grow by 2.5 per cent per annum.	https://www.education.gov.au/higher-education-statistics/student-data/selected-higher-education-statistics-2023-student-data/key-findings-2023-student-data
Number of employees in small, medium and large providers	Data was available for the number of employees working in Australian Universities but was not available for the number of employees working in Institutes of Higher Education and University Colleges. As detailed above the number of student enrolments was used to classify the data on the number of employees in Australian Universities as small, medium and large. Public data available on the number of employees in	TEQSA

	Australia Universities, was used to estimate the number of university staff in small, medium and large providers. As no public data was available for Institutes of Higher Education and University Colleges the number of employees working in those institutions was estimated by using student enrolment and staff data at similar sized institutions. Therefore, estimations on the number of employees in small providers was calculated by summing the estimations on the number of staff employed in Institutes of Higher Education and University Colleges and the Australian University providers which were classified as small.	
Growth in the number of employees	The number of employees in the sector is assumed to grow at a rate of 3 per cent per annum beginning from year two of the analysis. This assumption is a conservative estimate of the growth expected in the number of employees across the sector, based off historical data.	https://www.education.gov.au/higher-education-statistics/staff-data/selected-higher-education-statistics-2024-staff-data/key-findings-2024-higher-education-staff-statistics
Number of new employees	Based off historical data a conservative estimate on the number of new employees in the sector of to be 5 per cent of the total number of employees.	https://www.education.gov.au/higher-education-statistics/staff-data/selected-higher-education-statistics-2024-staff-data/key-findings-2024-higher-education-staff-statistics
Attribution factor (60 per cent for small providers, 40 per cent for medium providers and 20 per cent for large providers)	The analysis assumed that providers are already undertaking some of the activities needed to comply with the Code, due to existing regulations and policies. For small providers it is assumed that they are currently undertaking on average 30 per cent of the activities required by the Code and therefore will only incur 70 per cent of the costs related to comply with the full Code. The same logic is applied to medium providers (currently undertaking on average 50 per cent of the activities) and large providers (currently undertaking on average 70 per cent of the activities). The attribution factor has been applied to all of the costs the providers will face through complying with the Code.	DAE desktop research of existing federal and state government legislation
Compliance rate (fifth year onwards, 69 per cent for small, 70 per cent medium and 100 per cent large)	The analysis assumes that not all providers will comply with the Code. In the first year, DAE research suggests that small providers will only comply with 30 per cent of the Code's requirements on average, medium providers will comply 40 per cent on average and large 60 per	DAE in house research

	cent on average. It is expected that every year until reaching the fifth year of the Code's implementation that compliance will increase on average by 10 per cent for all providers. Finally in the fifth year there will be no increases in compliance. Only compliant providers were used in the cost calculations.	
Number of students and staff affected by GBV and making a disclosure to a higher education provider	Estimations on the prevalence of GBV occurring to higher education students and staff, using desktop research on the prevalence of various forms of GBV occurring in Australia. From that cohort estimations were made using surveys and studies to calculate the number of people who would make a disclosure to a higher education provider, they were employed in or studied at. It was estimated that the rate of disclosures would increase by 2 per cent per annum every year beginning from the fourth year of analysis, until reaching 15 per cent disclosures in year 9. An increase of 12 per cent from the base case of 3 per cent is assumed, given a study on increased in FDV reports in Victoria following the implementation of a new Code and practices resulted in a 14 per cent increase in reporting.	ABS, AIHW, NSS Survey, Vic study – Fed government report (see tab additional research in excel)
Total government costs	To calculate the cost to government of implementing the Code, data was provided by the Department. The data used for the calculations included the average expected annual salaries classified at levels SES-1, EL2, EL1, APS6, APS5 and AP4 over the forward estimates.	Data from the Department
Student, staff, volunteer and provider costs	Estimations were made on the amount of time, staff, students, volunteer and providers would spend meeting the requirements of the Code. The time was quantified using wage estimations for student and staff resources required by providers (additionally adding on overhead costs as well).	DAE estimates informed by stakeholder consultations

Limitation of our work

General use restriction

This report is prepared solely for the internal use of the Department of Education. This report is not intended to and should not be used or relied upon by anyone else and we accept no duty of care to any other person or entity. The report has been prepared for the purpose of estimating the costs and benefits associated with the proposed National Higher Education Code to Prevent and Address Gender-based Violence for input into the Department's own Impact Analysis. You should not refer to or use our name or the advice for any other purpose.

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