

Action Plan on Preventing & Responding to Sexual Misconduct & Harassment





GMIT is committed to providing a working and learning environment that is **Safe, Respectful, Supportive and Positive.**

GMIT condemns all levels of sexual violence and harassment and promotes a campus culture based on respect, dignity and integrity for all students, staff and visitors.

GMIT believes in the objectives outlined in the Framework for Consent - Ending Sexual Violence and Harassment in Irish Higher Education Institutions and is committed to achieving positive change under the four key outcomes:

1. **Institutional Culture**
2. **Institutional Processes: Recording**
3. **Institutional Processes: Policy**
4. **Targeted Initiatives**

This Action Plan has been developed by the Institute Working Group for Preventing and Responding to Sexual Misconduct and Harassment.

It sets out institutional actions that will address sexual misconduct and harassment and outlines GMIT's commitment to the implementation of the Consent Framework.

Working Group Members

Mary Nestor (Equality, Diversity & Inclusion) (Co-Chair)	Colin Kearney (Students' Union)	Dervla Fahy (Student Services)
Debbie Molloy (Student Services) (Co-Chair)	Paula Cannon (Human Resources)	Daniel Caldwell (Student Services)
Dr Mossy Kelly (School of Science)	Maura Gilligan (Human Resources)	Erin Carroll (Student representative)
Dr Michael Hannon (Registrar)	Monica Megraw (Student Services)	Michelle Caulfield (Galway Rape Crisis Centre)
Dr Trevor Clohessy (School of Business)	Anita Mahony (Student Services/Healthy Campus)	Bernadette Larkin (Student Services)
Roisin Murphy (Student Mentor)	Kevin Gyves (School of Design & Creative Arts)	

This plan is endorsed by GMIT's senior management team.

Glossary of Terms	
APS	Approved Programme Schedule
ART	Anonymous Reporting Tool
CUA	Connacht-Ulster Alliance
EDI	Equality, Diversity, and Inclusion
GMIT	Galway Mayo Institute of Technology
HEA	Higher Education Authority
HR	Human Resources
LIS	Learning & Innovation Skills
NUI	National University of Ireland
PCHEI	Psychological Counsellors in Higher Education in Ireland
PRSMH	Preventing and Responding to Sexual Misconduct and Harassment
SCS	Student Counselling Service
SU	Student's Union
THEA	Technological Higher Education Association
ToR	Terms of Reference
VLE	Virtual Learning Environment
WG	Working Group
WGPRSMH	Working Group for Preventing and Responding to Sexual Misconduct and Harassment

Relevant Consent Framework Outcome	Action No.	Action	Progress to Date/ Milestones achieved	Person Responsible	Timeframe (start/end)	Success Indicator
1. Institutional Culture						
<i>A member of HEI senior management team will have responsibility for the implementation of the Framework</i>	1a	Assign responsibility for work in this area to a member of the institution's senior management.	Registrar is a member of WGPRSMH.	Registrar	March 2021	Responsibility assigned and formally notified to senior management team and Governing Body.
	1b	Create a publicly accessible webpage on the institution's approach to preventing sexual violence and harassment in an easy-to-find area of the institution's website. This webpage will formally state senior management's support for, and leadership of work in this area.	Subgroup has surveyed other HEI websites on Consent.	Culture Subgroup	Feb 2021	Webpage checks and updates logged on agreed dates. Webpage launched and announced to all staff & students by member of senior management responsible.
			Subgroup has drafted content for website.	Culture Subgroup	March 2021	
			Due to commence construction in collaboration with Marketing in late March 2021.	Marketing Office		
1c	Review this webpage at least once per semester and update to reflect any noteworthy developments.	Pilot website with staff/student user group before it goes live; amend/edit based on feedback	Marketing Office/ Culture Subgroup	April 2021	May 2021	

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1. Institutional Culture						
<i>HEIs will establish an Institutional Working Group to coordinate Framework implementation. This will be comprised of key stakeholders including academics, support services, administration, and student's union and will ensure due regard to balanced representation, in particular, representation of groups especially at risk of experiencing sexual violence and harassment; women, those with disabilities, ethnic minorities, and LGBT.</i>	2a	Form an institutional working group, achieving balanced representation.	WGPRSMH has been formed. Baseline membership is representative in terms of gender balance; involvement of all major academic faculties or units; inclusion of underrepresented/marginalized groups, and external liaison. GMT was represented on the THEA working group for promoting consent and preventing sexual violence working group by the Student Services Officer.	Registrar	Jan 2021	Balanced representation across staff and student body achieved. Future membership will be compared to this baseline representation.
	2b	Agree Terms of Reference with Working Group members.	Approved.	Co-Chairs WGPRSMH	9 Feb 2021	Terms of Reference agreed & timeline for review set.
		Set timeline for review of ToR.	Agreement to review ToR on an annual basis.	Co-Chairs WGPRSMH	February 2022	Conduct review of ToR, amend as required.

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1. Institutional Culture						
<i>Liaison and partnership with external specialist agencies to ensure effective engagement with external structures.</i>	3a	Collate, design & disseminate information for staff & students on external and internal services & the roles that they fulfil in responding to sexual violence. This will include on-campus posters, website download, orientation packs, induction slides, student accommodation welcome packs, social media advertising, induction pack for new staff, etc.	Information is provided in existing workshops.	Student Counsellors/ Student Services Officer/& HR	Ongoing	Logged date(s) of dissemination to staff & students.
	3b	Check/update this information annually in advance of the start of the academic year.		Student Counsellors/ Student Services Officer/& HR	Ongoing	Logged date(s) of information being checked & disseminated to all staff & students.
	3c	Include Consent/Sexual Violence/ Harassment as a topic in the President's 'All Staff' teams meeting.		President's	April 2021 staff meeting	Increased awareness of consent amongst staff.

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2. Institutional Process Recording						
<i>HEIs will create an easy to use system for students and staff to disclose and report incidents, which would be reflected in a high level of awareness and understanding among both students and staff.</i>	4a	GMIT will participate in National Surveys (e.g. HEA survey in April) to establish a baseline awareness of reporting mechanisms. Questions will be included in the biennial EDI Survey.	GMIT students participated in the NUI Galway Sexual Experiences Survey.	Student Services/HR		% Response rate will establish base line data.
	4b	Develop a guidance document for staff receiving a disclosure/ complaint.		Registrar's Function/ HR Function WG for Reporting	By September 2021	New Procedures approved by Executive Board and Governing Body.
	4c	Promote procedures for reporting of sexual misconduct (embed in Welcome Programme etc).		All staff and student responsibility to be aware of these policies and to promote them.	Ongoing	Awareness levels of new policy will be measured in Q2 in 2022 in EDI/Athena Swan Survey.
	4d	Implement an Anonymous Reporting Tool (ART) named "Speak Out" to report incidents of sexual misconduct when available.	GMIT (with the CUA and PCHEI) were successful in a funding call to introduce an anonymous reporting tool. GMIT are participating on the working group to design and implement this system.	Student Counsellor represented GMIT on the WG.	By September 2021	GMIT will have the "Speak Out" system available for staff and students to report incidents of sexual misconduct and harassment.

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2. Institutional Process Recording						
	4e	Raise awareness among all staff and students on the availability of the anonymous reporting tool "Speak Out". Provide training on how to use the system and educate relevant stakeholders on the importance of recording incidents of sexual misconduct.		Student Services, HR and the WG for preventing and responding to sexual misconduct and harassment.	Annually starting in Q4 2021	Numbers using the reporting system will increase
	4f	Map processes for formal reporting on flowcharts, clearly illustrating all potential response pathways.		Student Services, HR, and the reporting subgroup for preventing and responding to sexual misconduct and harassment (WGPRSMH).	By September 2021	Reporting processes will be visible on the consent section of the website and on the student hub
	4g	Training for relevant staff on reporting mechanisms.		Student Services, HR, and the reporting subgroup for the preventing and responding to sexual misconduct and harassment (WGPRSMH)		Ongoing

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2. Institutional Process Recording						
<i>The reporting system is compatible with reporting party/survivor rights, cognisant of the needs of vulnerable groups, and has the confidence of the higher education community.</i>	5a	Recruit a wide-ranging institutional working group, including counselling service & representatives of relevant external specialist agencies.	A subgroup of the WGPSMH for Reporting is established	PRSMH Subgroup on reporting.	January 2021	Subgroup with balanced representation will meet quarterly.
		The reporting subgroup of the WGPRSMH will be expanded:	Membership: Student Counsellor Chaplain Student Affairs Manager			
		Target Membership: Group to be expanded to include external representative, representation from vulnerable groups including LGBT+ and disability.				
		This group will have responsibility for providing feedback on all reporting mechanisms i.e. 'Speak Out'/Formal GMIT Grievance/ Complaints.			May 2021	Data Capture and retrieval processes implemented, monitored, and reported on.
		Targeted Meetings: Subgroup will meet quarterly.			Quarterly	
	5b	Reporting mechanisms regularly reviewed.		Registrar/HR Function/ PRSMH Subgroup on reporting.	Annually	Group meets annually and reviews reporting mechanisms and implements any recommendations for improvement.

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2. Institutional Process Recording						
	5c	Put in place comprehensive disability adaptations for in-person and remote reporting and offer internal and external supports.		Disability Service/ Student Services/HR.	February 2022	Alternative/additional arrangements for disclosure are advertised on the webpage for Consent.
<i>Institutions shall record statistics on harassment, assault, and rape and report them in the context of their strategic dialogue with the HEA.</i>	6a	Analyse 6 monthly data from the anonymous-reporting tool.		WGPRSMH – Subgroup on reporting.	Bi-annually from date of implementing ART	Data will be available to report on.
	6b	Add relevant questions to any existing annual EDI or other surveys of students/staff.		Subgroup on reporting to work with EDI manager and SU.	EDI survey is deployed Biennial	Relevant questions will be included relevant surveys.
	6c	Summarise high-level data on disclosures/formal reports made.		WGPRSMH – Subgroup on reporting.	Annually	Data will be reported to senior management and the Governing Body annually.
	6d	Monitor the number of contacts made to designated contact people.		WGPRSMH – Subgroup on reporting.	Annually	
	6e	Establish a team of designated contact persons to receive disclosures.		Working group for preventing and responding to sexual misconduct and harassment.	September 2021	A group will be established and contact details will be published.

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3. Institutional Processes Policy						
<i>Dedicated policies of breadth and depth consistent with the Framework aims referencing IUA/THEA guidelines and policies where appropriate.</i>	7a	Review existing policies in light of THEA, IUA and other good-practice guidelines to ensure that policies clearly addressing sexual violence and harassment are available and published.	Subgroup of GMIT's WGPSMH established to review relevant policies.	Subgroup on policy/ HR/Office of the Registrar	Feb 2022	Updated policy approved and published.
		Form a subgroup to review relevant policy across the CUA to align existing policies and embed values of the consent framework. Develop a common CUA policy for preventing and responding to sexual misconduct and harassment.	Preliminary contact made with CUA partners – outline membership agreed. First meeting expected in April 2021 and quarterly thereafter.	Subgroup on policy	April 2021 to January 2022	Updated policy will be approved and published across the CUA. Baseline awareness levels of new policy will be established in Q2 in 2022 in EDI/ Athena Swan Survey.
		RE 4b above: Update existing complaints procedure with guidance on recording.			September 2021	Updated procedure approved and published.
		Annual review of common CUA policy conducted.	Policies have review date agreed in policy document.	HR/Office of the Registrar	As outlined in policy document	Recommendations from review will be documented and changes implemented to ensure the policy remains up to date and fit for purpose.
<i>Policies are explicitly linked to clear lines of responsibility, active responses, institutional reporting, and regular review.</i>	8a	Identify who is responsible for responding to staff disclosures of sexual violence and harassment, for reporting.	HR Manager identified as primary contact responsible for responding to disclosures from/against staff.	HR Manager	Legacy/ existing	Map of reporting lines published on institution's website [provide URL].

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3. Institutional Processes Policy						
	8b	Identify who is responsible for responding to student disclosures of sexual violence and harassment, for reporting.	Student Services including Counsellor/Chaplain/Nurse are primary contact responsible for responding to disclosures from/ against students.	Counsellor/ Chaplain/Nurse	Legacy/ existing arrangement	Map of reporting lines published on institution's website – provide URL.
	8c	Members of WGPSMH undertaking disclosure training.	Training booked for April 2021.	Members of the WGPSMH	April 2021	Improved capacity within the Institute to receive and respond to disclosures.
	8d	Map reporting line(s) between the Working Group's Chair and membership, the institution's President and senior management team, and the Governing Body.	In progress	Co-Chairs WGPSMH	April 2021	Organisational Chart approved as part of the ToR of WGPSMH.
<i>Policies include guidelines for addressing Staff and student complaints, including transparency for all involved.</i>	9a	Include the mapping and reporting processes in the policy, for formal reporting on flowcharts, which clearly illustrate all potential response pathways.	Existing complaints procedure/ grievance procedure available online on the student hub and the staff portal.	Student Services, HR, and the policy subgroup of the WGPRSMH	Sept. 2021	The following indicators relate to both 9a and 9b – Web content launched and announced to all staff & students by member of senior management responsible.

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3. Institutional Processes Policy						
	9b	On the website, include information on the purpose of anonymous information gathered through the anonymous-reporting tool. Create a Privacy Notice explaining how this information will be analysed and used institutionally. Action linked to 4e.		Policy subgroup/ Reporting subgroup/ Data Protection Officer	Sept. 2021	Baseline awareness levels of existence and purpose of reporting tool will be established in Q2 in 2022 in EDI/ Athena Swan Survey.
<i>Policy implementation is supported by compiling relevant information, leadership of high level HEI officer, and through the appropriate structures, an annual report on institutional initiatives and data to the Governing Authority.</i>	10a	Prepare an agreed template for reporting to the Governing Body, noting data collated and initiatives proposed and/or implemented.	Draft template has been prepared.	Co-Chairs of WGPRSMH	May 2021	Template approved by working group.
	10b(I)	Present the action plan to Executive Board for approval.		Co-Chairs of WGPRSMH	16/3/2021	Endorsement and support of senior management team and Governing Authority.
	10b(II)	Present the action plan to Governing Board.			April Meeting	
	10c	Introduce annual reporting to the Governing Body on preventative and response measures to sexual violence and harassment.		WG to provide report to Executive Board and the EDI subcommittee of Governing Board.	April/May 2022	Report presented to Governing Body, as scheduled, with feedback sought on next steps.

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4. Targeted Initiatives						
<i>HEIs will provide direct student-facing activities including workshop/ classes that promote an understanding of consent; student understanding and skills for speaking up and calling out unacceptable behaviour.</i>	11a	Continue to make consent programme (workshops and eLearning module) available to first year students, through various routes, building upon numbers from previous year.	GMIT have been offering workshops since 2014. Since 2019 the online workshop has been presented to over 1500 students. This year 24 workshops were offered to all first years between October 2020 and January 2021 with an attendance of 603 students.	Student Services	Offering consent programme in Semester 1 each year.	Minimum increase of 20% (150 students) attending consent workshops annually up to Q4, 2024. Analysis of data illustrates evidence of high levels of engagement by target cohorts.
	11b	Roll out consent programme to remaining cohorts across years to 2-6 (including postgraduate students).	7 additional workshops offered to all students in January/ February 2021. Total of 393 students (all years) attended.	Student Services	Offering multiple deliveries of consent programme in Semester 1 each year.	Numbers attending from years 2-6 should decrease as numbers of year 1 attendees increases. For 2022 to 2024 years 2-6 attendances should increase by 10% on 2021 number of 393. Analysis of data illustrates evidence of high levels of engagement by target cohorts.

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4. Targeted Initiatives						
	11c	Pilot e-learning module with a specific academic programme as a pilot.	In discussion with NUIG and learning technologist in GMIT to upload programme to our VLE.	Student Services	End of semester 2 2021	50% of students on the selected pilot academic programme complete the training. Evaluation and feedback provided to programme provider – NUI Galway.
	11d	Offer UCC Bystander Intervention training for targeted students – SU Class reps, PASS Leaders, year 3 and year 4 of social care programme.		Student Services in collaboration with Students Union.	Oct/Nov 2021	25% of targeted students complete Bystander training.
	11e	Desirable Develop 'Active*Consent' Award (completion of all training workshops/sessions).		Student Services	2022/2023	Launch of Active*Consent Award.
	11f	Desirable Embed consent programme into the curriculum, via LIS and delivered by lecturers.		Vice President for Academic Affairs	2023/2024	Inclusion of Active*Consent programme in the APS for LIS.

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4. Targeted Initiatives						
<i>Ongoing messaging to disseminate information consistent with the Framework aims for cultural change and awareness.</i>	12a	Prepare annual plan for communications and promotions (consent/bystander etc.) linking to institutional, national or worldwide events, campaigns etc., e.g. 16 days of activism against gender-based violence, Sexual violence/Sexual Assault week, SHAG week, First 5 weeks etc.	<p>Social Media campaign day on why consent is so important held during week 3 of “First5weeks”</p> <p>Weekly social media promotion each Tuesday during the first semester on Consent run by Healthy Campus.</p> <p>Branding – hoodies and masks. Masks given to students in Semester 1. Remaining masks issued to students in Student accommodation close to the college.</p> <p>2 students have designed pull up stands that will be issued to all 5 campuses.</p> <p>#GMIT40DaysofLent Healthy Campus campaign – (19th March) challenge set for students to watch 4 ‘Consent’ videos and share the video they think get the message across most effectively.</p>	Student Services and Students Union, collaborating with external specialist agencies.	September 2021	<p>Creation of plan by September 2021.</p> <p>Promotion/campaigns held in line with dates detailed in communications plan.</p>
	12b	Create GMIT Consent standalone social media platforms (see NUIG Active Consent for example) which requires student contribution and tagging relevant internal services and external agencies.		Student Services in collaboration with Healthy Campus Co Chair.	September 2021	<p>Social media platforms created by September 2021.</p> <p>Weekly use of platforms to promote campaigns.</p>

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4. Targeted Initiatives						
	12c	Publish a list of staff who are trained, and agree, to receive disclosures update regularly.	Disclosure training arranged for the WGPRSMH in April 2021.	Student Services HR EDI In collaboration with Marketing Office	Before September 2021	Webpage checks and updates completed at the beginning of each semester.
	12d	Regularly update GMIT Website, Student Hub and Staff Portal with information relevant for each specific portal. Information includes, policies, procedures etc.	Work has commenced on Consent Webpage due to launch in April 2021.	Student Services HR EDI In collaboration with Marketing Office and IT Services	Before September 2021	Checks and updates completed at the beginning of each semester.
	12e	Desirable Host a stand-alone Consent Week in collaboration with SU, HR and GRCC.		Student Services Student's Union HR	2022/2023	Hosting of Consent Week.
<i>HEIs will create and implement an education plan to ensure all staff and relevant students have at least a minimal agreed understanding and capacity to support students; create and implement a training plan for staff and students who contribute to initiatives and services.</i>	13a	Implement NUIG's 15 minutes (general awareness) disclosure training as part of new staff induction.		HR and EDI in collaboration with Staff Development Office	October 2021	All new members of staff complete general awareness training.

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4. Targeted Initiatives						
	13b	Roll out general awareness education programme to remaining staff building on each year.		HR and EDI in collaboration with CPD	Starting 2021/2022	Target of having reached 40% of staff by 2023/2024.
	13c	Offer Active*Consent briefing by NUIG team to Management Group, Executive Board and Academic Council.		EDI	2021/2022	Briefing given to Management Group, Executive Board and Academic Council.
	13d	Implement GRCC/NUIG disclosure training for Working Group.	Disclosure Training dates agreed with GRC April 7 th /8 th 2021.	Student Services	April 2021	50% of working group complete 6-hour training session.
	13e	Implement GRCC/NUIG disclosure training for frontline/key staff – student services staff, SU, class reps, PASS leaders, Management Group, Executive Board, Graduate Mentors, HR staff.	A small number of staff have already received disclosure training as part of pilot initiatives in collaboration with NUI Galway. The WGPRSMH are booked in to receive the training in April.	Student Services relating to SU, class reps, PASS leaders HR relating to staff in collaboration with Staff Development Office	October/ November 2021 to Q4, 2024	20% of targeted staff/ students undertake disclosure training.
	13f	Offer GRCC/NUIG disclosure training for interested staff – academic, specific PMSS etc.		HR and EDI in collaboration with Staff Development Office	2022/2023	Additional 5% of staff undertake disclosure training.
	13g	Issue disclosure card to all students and staff and make available online.		Student Services relating to students HR relating to staff	October 2021	Disclosure card online via website, Student Hub and Staff Portal. Physical copies onsite when permissible.

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4. Targeted Initiatives						
	13h	UCC Bystander Intervention training for targeted staff – student services staff, WG members, Management Group, Graduate Mentors and HR staff.		HR and EDI in collaboration with Staff Development Office.	2021/2022	20% of targeted staff undertake Bystander training.
	13i	Further rollout of UCC Bystander Intervention training to staff including Executive board, academic, PMSS.		HR and EDI in collaboration with Staff Development Office.	2022/2023	15% of staff offered training undertake training.
	13j	Include NUIG general awareness education programme on the new staff induction site.		HR and EDI in collaboration with Staff Development Office.	October 2021	Content available on new staff induction site by October 2021.
	13k	Offer online workshops on sexual violence and its impact for interested staff.	These are arranged for Q2 in 2021.	HR and EDI in collaboration with Staff Development Office and Student Services.	Ongoing to 2024	Workshops scheduled annually.
	13l	Desirable Implement specialist guidance and training for staff who work with or respond to disclosures, e.g. investigator training.		HR and EDI in collaboration with Staff Development Office.	2023/2024	Monitor attendance of staff attending specialist training.
	13m	Desirable Promotion of external conferences & training courses to staff.		HR and EDI in collaboration with Staff Development Office.	2022/2023	Monitor attendance of staff attending any training/conference.

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4. Targeted Initiatives						
<i>HEIs will create and implement a system for measuring effectiveness of initiatives.</i>	14a	Develop an Oracle report to record and track participation with various initiatives.		Reporting Office/ Student Services.		
	14b	Conduct short survey with students/staff on whether they are aware of services, how to make disclosures, report, complaints and counselling and advocacy etc.		Student Services in collaboration with EDI.	Complete survey each November	Data disaggregated by gender, discipline and other relevant criteria will enable identification of cohorts that require further targeted intervention. Survey completed and actions taken based on feedback.
		Use results of surveys in existing workshops/training provided by NUIG/UCC etc. to ascertain satisfaction levels and effectiveness of workshops and education awareness initiatives and use to identify improvements and targeted groups which may need a tailored response e.g. international student, LGBT+.		Student Services/HR/ EDI Student Services/HR/ EDI	2021/2022	Access to and use of results of surveys from consent programmed by NUIG and UCC. Improvements identified and response identified.
	14c	Conduct survey with staff on training needs, monitor and use to make decisions.		HR EDI	2022/2023	Use initially to set baseline. Use data to make decisions on training needs.

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4. Targeted Initiatives						
	14d	EDI to include a section on sexual violence and harassment in the EDI survey to staff and students.		EDI	2021/2022	Use initially to set baseline. In subsequent survey's use to set targets. Increased levels of staff awareness.
	14e	Desirable Collaborate with NUIG/UCC etc. to include survey questions at end of consent programmes to meet GMIT information requirements.		Student Services	2021/2022	Inclusion of GMIT specific questions.
<i>HEIs will provide accessible, trauma-informed services; for supporting student disclosure, reporting and complaints, and for counselling and advocacy.</i>	15a	Publish a list of people (multi-disciplinary) who have received trauma-informed training plus a list of external agencies such as GRCC, sexual assault treatment unit etc. on public website.		Student Services	Before September 2021 and twice yearly	Webpage checks and updates made at beginning of each semester.
	15b	Clear signposting of where students and staff can find info on disclosing, reporting, complaints, supports and 'safe spaces'.		HR relating to staff Student Services relating to students.	Before September 2021	Webpage checks and updates made at beginning of each semester. (website, student hub, staff portal).

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4. Targeted Initiatives						
	15c	Identifier/sticker for office doors and digital signature to identify staff/students trained to receive disclosures.		Student Services in collaboration with HR/ EDI.	Before September 2021	Design, printing, and display of physical identifier/sticker for buildings/offices of identified staff. Design, creation and use of digital signature by identified staff. Info on identifier/ sticker available on relevant section of website/student hub/ staff portal.
	15d	Desirable Conduct survey with SCS to identify needs e.g. portion of counselling staff who have received training in supporting survivors of sexual assault, any specialist CPD they need, evaluate satisfaction levels of counselling staff with existing institutional referral pathways, assess overall capacity to respond to students' requests for counselling in timely manner, seek aggregated/ statistical information from local Rape Crisis Centres on students' attending their service.		Student Affairs Manager/Student Counsellors	2022/2023	Set baseline data with initial survey. Use data to set targets and improvements. Repeated every 2 years to track progress in resolving any issues raised.

