

SEXUAL ASSAULT AND SEXUAL HARASSMENT POLICY AND PROCEDURE

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Policy Lead	Director of Learning and Innovation
Approving Authority	Board of Directors
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Version	2024.2
Relevant legislation or external requirements	<p>National Code of Practice for Providers of Education and Training to Overseas Students 2018 (NC: 6, 9, 10) Higher Education Standards Framework (Threshold Standards) 2021 (HESFs: 2.3, 2.4)</p> <p>Age Discrimination Act 2004 (Cth) Anti-Discrimination Act 1977 (NSW) Australian Federal Criminal Code Act 1995 (Cth) Australian Human Rights Commission Act 1986 (Cth) Crimes Act 1914 (Cth) Crimes Act 1900 (NSW) Defamation Act 2005 (NSW) Disability Discrimination Act 1992 (Cth) Equal Opportunity Act 2010 (Cth) Equal Opportunity for Women in the Workplace Act 1999 (Cth) Fair Work Act 2009 (Cth) Human Rights Act 2004 (Cth) Multicultural Act 2000 (NSW) National Higher Education Code to Prevent and Respond to Gender-based Violence (National Code) National Plan to End Violence against Women and Children 2022-2032. Privacy Act 1998 (Cth) Racial Discrimination Act 1975 (Cth) Sex Discrimination Act 1984 (Cth) Work Health and Safety Act 2011 (Cth) Workplace Gender Equality Act 2012 (Cth) Workplace Relations Act 1996 (Cth) Education Services for Overseas Students Act 2000 (ESOS Act 2000) Tertiary Education Quality and Standards Agency Act 2011 (TEQSA Act)</p>
Related ASA Documents	<p>Student Code of Conduct Staff Code of Conduct Discrimination, Bullying, and Harassment Policy and Procedure Diversity and Equity Policy and Procedure Student Support Framework Student Grievance Policy Student Grievance Procedure Student Support, Wellbeing, and Health Policy and Procedure Mental Health Framework Privacy Policy Privacy Procedure Critical Incident Management Plan Work, Health, and Safety Policy Work, Health, and Safety Procedure</p>

1. Purpose

The purpose of this Policy and related procedure is to ensure that ASA implements and maintains appropriate support frameworks to:

1. Promote student and staff safety.
2. Initiate and embed prevention measures across all settings.
3. Act quickly and appropriately to protect students and staff safety when disclosures and reports are made.
4. Ensure reporting pathways, processes and support services are centred on the needs and safety of victim-survivors.
5. Ensure appropriate penalties are imposed on perpetrators.

2. Scope

This policy applies to all ASA applicants, students, staff, directors, officers, external appointees on any ASA board or committee, volunteers, visitors, and contractors.

It extends to all ASA-related places including academic and non-academic spaces and off-site functions including but not limited to work lunches, conferences, Christmas parties, client functions, external meetings, classrooms, collaboration room, library spaces, online functions, work placements, and facilities.

3. Principles

The principles guiding this policy and procedure are driven by the Australian Human Rights Commission's recommendations (2017, pp. 168-186) and the National Plan to End Violence against Women and Children 2022-2032. These principles include:

3.1 Leadership and Governance:

A strong and visible commitment to action from ASA leaders with the aim of developing an open and welcoming learning experiences for staff and students, accompanied by clear and transparent implementation of these recommendations.

3.2 Changing attitudes and behaviours:

Development of measures aimed at preventing sexual assault, sexual harassment, and gender-based violence.

3.3 Collaboration:

Working together with students, staff, senior management, boards, committees, and experts to address gender-based violence, sexual assault, and sexual harassment and co-design effective processes.

3.4 Effective processes:

Implementation of effective processes for responding to sexual assault, sexual harassment, and gender-based violence. These processes assure timely and accurate advice to staff and students regarding support services.

3.5 Monitoring and evaluation:

Ensuring that prevention and responses to sexual assault, sexual harassment, and gender-based violence are evidence-based, trauma-informed, centering the voices and needs of victim-survivors and that improvement to prevention and response mechanisms are made over time.

4. Definitions

Term	Definition
anonymous disclosure	Anonymous disclosure is where the complainant chooses to remain anonymous and/or chooses not to disclose the name of the respondent.
ASA community	ASA community refers to all students and staff members of ASA.
bullying	Bullying is when people repeatedly and intentionally use words or actions against someone or a group of people to cause distress and risk to their wellbeing. These actions are usually done by people who have more influence or power over someone else, or who want to make someone else feel less powerful or helpless.
bystander	A bystander is someone who witnesses an incident of sexual misconduct or gender-based violence or is told about an incident after it occurred.
Chief Executive Officer (CEO) / Principal	The Chief Executive Officer is the highest organisational role for ASA and performs the role of Principal as well as their other duties.
Commonwealth Ombudsman	The Commonwealth Ombudsman is the national body appointed to oversee escalated international student complaints on a range of issues, including student safety, welfare, course administration, reasonable adjustments for students and other matters (excluding matters of academic merit). It is centred on student voices and needs and is accessible and transparent through the full complaints cycle.
complainant	A complainant is a member of the ASA Community who has made a disclosure or report under the provisions contained within this Policy. A complainant may choose to disclose or report an incident of sexual assault or sexual harassment or gender-based violence.
confidentiality	Confidentiality is the principle upheld to ensure that information provided under this policy is only disclosed to those legitimately involved in resolving the complaint, providing support to a complainant, or as required by law.
consent (sexual)	Consent is having the capacity to give free and voluntary agreement, expressed outwardly through mutually understandable words or gestures, agreeing to engage in a particular activity. Consent can be withdrawn by any party at any point and must be voluntarily given and is not valid if a person is being subjected to actions or behaviours that elicit emotional, psychological, physical, reputational, financial pressure, threat, intimidation, or fear (coercion or force). Consent to engage in one sexual activity, or past agreement to engage in a particular sexual activity, cannot be presumed as agreement for consent to engage in a different sexual activity or to repeat a sexual activity. Consent cannot be given by a person who does not have the capacity to give consent, including those who are intoxicated, unconscious, unwell, distressed or otherwise disadvantaged.
disclosure (SASH)	Disclosing the incident is where an individual confides in someone else that they have been the victim of sexual harm, or concerning threatening or inappropriate behaviour.
discrimination	Happens when a person or a group of people: <ol style="list-style-type: none"> 1. is treated less favourably than another person or group because of a particular characteristic or attribute (or because they associate with another person or group with a particular characteristic or attribute) ('direct discrimination'); or 2. where an unreasonable rule or policy, which applies to everyone has an unfair effect on a person or group, because they have a particular characteristic or attribute ('indirect discrimination'). Protected characteristics or attributes include a person's age, breastfeeding, family responsibilities, gender identity or intersex status, impairment or disability, lawful sexual activity, parental status, political belief or activity, pregnancy, race, relationship or marital status, religious

	belief or activity, sex, sexuality, social origin, trade union activity, and irrelevant criminal or medical record.
gender-based violence	Gender-based violence is violence that is used against someone because of their gender. It describes violence rooted in gender-based power inequalities, rigid gender norms, and gender-based discrimination.
harassment	Undesirable conduct that induces feelings of belittlement, intimidation, offense, or apprehension, and which a reasonable person, considering all circumstances, would anticipate causing offense, intimidation, or apprehension.
natural justice	<p>Natural justice is a principle that provides for procedural fairness to all parties by ensuring:</p> <ul style="list-style-type: none"> • all parties must be given an opportunity to present their case. • the respondent must be provided with notice and information about allegations made against them and information about their rights including to have a support person. • the respondent must be given a reasonable timeframe within which to respond. • the decision maker must declare any conflict of interest. • the decision maker must: <ul style="list-style-type: none"> • act fairly and without bias • consider all relevant evidence • base any decision on evidence that supports it. • All relevant parties will be informed in writing of the outcome of a formal investigation.
protected attributes	<p>There is a range of federal and state legislation that prohibits discrimination and harassment on the basis of the following attributes or conduct:</p> <ul style="list-style-type: none"> • Age • Breastfeeding • Disability • Family or carer's responsibilities • Marital or relationship status • Political conviction • Pregnancy or potential pregnancy • Race, colour, descent, nationality, ethnic, ethno-religious or national origin • Religion • Gender • Sexual orientation or preference • Transgender status • Actual or imputed characteristics of any of the attributes listed above • Association with a person identified by reference to any of the attributes listed above.
report	Formally reporting is where a student or staff member provides a formal account or statement about the sexual harm to ASA. As a result, an internal investigation may commence determining if the conduct constitutes a breach of any relevant policies, procedures, legislation or code of conduct.
respondent (SASH)	A respondent is a member of the ASA Community who has been accused of sexual assault or sexual harassment or gender-based violence under this policy.
Senior Management team	<p>A group of senior operational staff who report to the CEO and have specific functional responsibilities within ASA. The Senior Management team consists of:</p> <ul style="list-style-type: none"> • Chief Executive Officer/Principal • Academic Dean

	<ul style="list-style-type: none"> • Director International Recruitment • Director Learning and Innovation • Director Quality and Compliance • Director Student Experience
sexual assault	<p>Sexual Assault occurs when a person is forced, coerced, or tricked into sexual acts attempted or sexual contact is performed against their will or without their consent.</p> <p>Sexual assault describes the forced penetration of the vagina or anus of any person with any part of the body of another person, or any object, against their will or consent. It also includes oral sex.</p> <p>Sexual assault is a crime under the Australian Law. Sexual assault can be committed against people regardless of their gender, age, sexual orientation, ability, and background. Sexual assault is sometimes referred to as rape, sexual abuse, or sexual violence.</p>
sexual harassment	<p>Sexual harassment is any unwelcome behaviour of a sexual nature that makes a person feel offended, humiliated, and/ or intimidated. It may include, but is not limited to, unwelcome sexual advances, persistent questions relating to a person's sexual orientation or sex life, or unwelcome requests for sex or sexual favours. Sexual harassment is a form of sex discrimination, can be obvious or indirect, can be physical or verbal, can be repeated or one-off and can be perpetrated by any gender and towards any gender.</p>
sexual misconduct	<p>Sexual misconduct is a general term that includes sexual harassment and sexual assault. Some forms of sexual misconduct can occur online including through email, websites, online meetings, social media, games, or other forums. Some sexual misconduct may also amount to criminal conduct.</p>
trauma-informed response	<p>A trauma-informed response is a response that demonstrates an understanding and recognition of the impact of trauma, and emphasises physical, psychological, and emotional safety, and the importance of empowerment and choice for those who have been subjected to sexual assault or sexual harassment or gender-based violence.</p>
unproven complaint	<p>An unproven complaint refers to a complaint which is found to be unsubstantiated.</p>
victimisation	<p>Occurs if a person commits, or threatens to commit, an act against a complainant or respondent, or another person acting in support of a complainant or respondent as a result of that complaint.</p>

5. Policy Details

5.1 Leadership and Governance

The Chief Executive Officer (**CEO**) takes responsibility for the implementation of this policy and evaluation of initiatives. The Senior Management team is the advisory group that guides initiatives throughout the organisation.

ASA initiatives, the Critical Incident Register, and recommendations are reported to the Board of Directors. External advice is sought from governing board members and external independent bodies.

5.2 Changing attitudes and behaviours

ASA seeks to educate staff and students with evidence-based training and advice with the aim of preventing sexual harassment, sexual assault, and gender-based violence by informing students about consent, promotion of gender equality, respect, diversity, and inclusion and how to access support if needed.

The following education initiatives are used:

- Mandatory completion of the SASH and gender-based violence educational module and quiz for all staff and students.
- Key contacts are displayed around the campus.
- Policies and procedures are communicated to all staff and students.

5.3 Collaboration

ASA is committed to take an inclusive and intersectional approach to address sexual assault, sexual harassment, and gender-based violence. ASA are committed to implementing a culture of preventative measures and processes which is co-designed by students, staff, senior management, boards, committees, and experts to ensure that all staff and students are safe. Our commitment to design and implement a trauma-informed, centering on the voices and needs of victim-survivors and will continually reflect and respond to existing and emerging evidence to improve the ASA culture, processes, and environment.

5.4 Effective Processes

ASA seeks to empower staff and students to identify and seek help if required by ensuring accurate, timely, and accessible Support Services are available.

ASA commits to the following:

- Communicating accurate information by investing in staff development and sexual harassment, sexual assault, and gender-based violence education prepared by the Wellbeing Officer who has expertise in psychology and counselling, and trauma-informed approaches.
- Students are referred to external services when necessary, including:
 - Commonwealth Ombudsman
 - Sexual Assault Counselling Australia
 - NSW Rape Crisis
 - 1800 Respect
 - Lifeline
 - Beyond Blue
 - White Ribbon Australia
 - QLife
 - Suicide call back service
 - NSW Police.
- Timely and accessible incident management.
- A wellbeing officer is appointed.
- The wellbeing officer's contact details are widely disseminated to all students and staff.
- Information about internal and external services to staff and students, including counselling and medical services, local sexual assault services, police, and hospitals are accessible to students through the website, the student support framework, policies, and procedures.
- Students are educated on this policy and procedure at orientation and staff are provided a copy of this policy and procedure as part of their induction.
- Information about internal and external reporting procedures and support services are displayed clearly on the website under the Current Students tab, Support and Wellbeing heading as the Sexual Assault and Sexual Harassment webpage.

5.5 Monitoring and Evaluation

ASA is committed to evaluating and reporting on the effectiveness of education initiatives and support services annually and report to the Board of Directors. This evaluation will assess:

- Any incident(s) that are recorded on the Critical Incident Register and included within the CEO reports to the Board of Directors
- The nature and number of reported incidents ensuring anonymity with de-identified reports. Trends will be identified and raised along with recommendations for improvement to the Board of Directors.
- The effectiveness of educational programs including completion rates and behaviour change in staff and students.
- Professional development requirements of key contact staff.
- The uptake of support service referrals.
- The efficiency of the disclosure/report/incident escalation process including compliance, timeliness and effectiveness, and privacy management.

6. Procedure Principles

These procedures will describe:

- a. How ASA will implement measures to prevent sexual assault, sexual harassment, and gender-based violence.
- b. How students and staff can make disclosures and reports of sexual assault, sexual harassment, and gender-based violence.
- c. How ASA will respond to disclosures and reports of sexual assault, sexual harassment, and gender-based violence using a trauma informed approach.
- d. How ASA will support students and staff impacted by sexual assault, sexual harassment, and gender-based violence.

6.1 Making a disclosure

A member of the ASA community may make a disclosure of an incident of sexual assault, sexual harassment, or gender-based violence by:

- Communicating with the Wellbeing Officer or other staff member.
- Calling 000 and asking to speak to the police.
- Using the SafeZone app if they feel there is an immediate threat to their safety.

The Wellbeing Officer or other staff member receiving the disclosure will take reasonable steps to:

1. Inform the complainant of the support available to them and of the reasonable measures that may be implemented to enable them to continue with their work or study if there are concerns for their safety.
2. Outline the options available to the complainant to help them determine any next steps they may wish to take.
3. Provide information and support in any other way as appropriate in the circumstances.
4. ASA may, at its discretion and in line with legislation, ASA policies and procedures, take action as appropriate in the context of a disclosure.

A complainant may disclose or make a report regarding an incident of sexual assault, sexual harassment, or gender-based violence to a member of the ASA community, then decide to make a report at a later time. There is no time limit on converting a disclosure to a report and a complainant may choose to do so at any time.

ASA recognises that a person who has disclosed incident of sexual assault, sexual harassment or gender-based violence may choose not to formally report the incident to ASA. ASA will respect a person's decision not to report the incident and will continue to provide information and support to the complainant.

However, in all instances, ASA has a responsibility to do the following:

- take any action to ensure the safety of the complainant, the ASA community and/or any identified third party, and
- make a mandatory report of suspicion of sexual assault or sexual harassment or gender-based violence has occurred to anyone under the age of 18 years of age.

6.2 Making an anonymous disclosure

Anonymous disclosures can be submitted through an online reporting form on the ASA website. Where a complainant chooses to remain anonymous, it may limit the actions available to ASA in response to the disclosure.

6.3 Making a report

A member of the ASA community may report an incident of sexual assault, sexual harassment, or gender-based violence by disclosing it with the Wellbeing Officer or other staff member. The report can also be made directly by using the ASA's online reporting form.

The person receiving the report will take reasonable steps to:

1. Ensure the complainant is informed about the support available to them and of the reasonable measures that may be implemented to enable them to continue with their work or study if there are concerns for their safety.
2. Outline the options available to the complainant to help them determine any next steps they may wish to take.
3. Provide information and support in any other way as appropriate in the circumstances.

7. Responding to reports

If a report of sexual assault, sexual harassment or gender-based violence is made, ASA will investigate and act in accordance with its policies and procedures and any applicable legislation.

The report will be managed by the CEO, Director Learning and Innovation or Academic Dean or the Wellbeing Officer according to the staff/ student status of the complainant and the respondent. For example, if it is a student disclosing or reporting about another student, the Wellbeing Officer or Director Learning and Innovation would look after this case. If it is a student disclosing or reporting about an academic staff member, the Academic Dean would look after this case. If it is a staff member disclosing or reporting about another staff member, the CEO would look after this case.

When a complainant reports an incident(s) of sexual assault or sexual harassment or gender-based violence, an investigation will be initiated within a reasonable timeframe. The report will be investigated, following the principles of natural justice, in a manner that is respectful to both the complainant and the respondent and in line with the requirements of the relevant instrument under which the report is being progressed.

The details of the incident(s) as described in the online form will be provided to the respondent as part of the investigation process.

An investigation by ASA will assess whether, on the basis of fact or the balance of probabilities, the allegation has been substantiated and if it has, whether it constitutes a breach of ASA's policies, procedures, employment contracts, agreements or the relevant code of conduct (as applicable to the respondent).

Where ASA investigates a report of sexual assault, sexual harassment or gender-based violence the outcome of the investigation will be provided in writing to the complainant and the respondent.

7.1 Interim Measures

ASA reserves the right to implement interim measures to reduce the potential for harm to any member of the ASA community. Interim measures do not in any way signal or anticipate the outcome of any investigation or process.

Interim measures are temporary restrictions or requirements in response to a disclosure or report of sexual assault, sexual harassment or gender-based violence, pending resolution of the disclosure or report.

7.1.1 Interim measures for Students

The CEO, Academic Dean or Director Learning and Innovation will determine interim measures as relevant to the specific circumstances of the disclosure or report and will be implemented in accordance with ASA policies, procedures, and relevant legislations. The CEO, Academic Dean or Director Learning and Innovation will provide details of the interim measures in writing to the relevant parties.

Interim measures for students may include one or more of the following:

- restricted access to particular course classes or modes of study;
- restricted access to specified building or facilities;
- prohibit a student from speaking to or approaching another person(s) including via social media, phone calls or messages, email, letter or through a third party; and
- any other temporary restrictions or requirements ASA deems necessary to reduce the potential for harm to any member of the ASA community.

7.1.2 Interim measures for Staff

Interim measures for staff will be determined by the CEO as relevant to the specific circumstances of the disclosure or report and will be implemented in accordance with ASA agreements, policies and procedures, Staff Code of Conduct, and relevant legislations.

8. Where a disclosure or report relates to a Third-Party Provider

If a report is received by ASA from a person who alleges sexual harassment, sexual assault or gender-based violence by an employee of a third-party provider, a SASH team will be convened by the CEO to determine the appropriate approach and assign key responsibilities.

The composition of the SASH team will be determined by the CEO regarding the specific details of the report. The SASH team will determine appropriate measures to manage the report including:

1. Appointing a support person such as the Wellbeing Officer for the student or a Human Resources representative for a staff member, to communicate with and provide support to the complainant through resolution of the report.

2. Appointing a case manager to liaise with the third-party provider and the contract manager, as necessary, to manage the alleged incident(s). The case manager will be appointed based on their capability to manage the matter.
3. The CEO will determine any necessary interim measures to be adopted during ASA's response to the report in line with these procedures.

The CEO has oversight of the management of the outcome of the report on behalf of ASA including liaison with the third-party and ensuring support for and communication with the complainant throughout the process.

The case manager and support person are responsible for advising the CEO of the progress/ action undertaken/ action required/ on the part of the third-party.

The CEO will ensure a report is completed on actions undertaken and the outcome of the process, including advising the complainant in writing.

9. Outcomes of disclosures or reports of sexual assault, sexual harassment and gender-based violence

If a student has been found to have behaved in a manner that breaches ASA policies, procedures, the Student Code of Conduct or relevant legislations, one or more of the following penalties may apply:

- a formal reprimand and/or caution;
- compulsory completion of a relevant training program and meeting with a Counsellor or relevant support service;
- enrolment restrictions and conditions. This may include cancellation or suspension of a student's enrolment; and/or
- immediate expulsion from ASA.

Where appropriate, and agreed by the student complainant and the student respondent, one or more of the following restorative actions may be applied:

- provision of a written apology by the respondent to the complainant; and/or
- facilitated conversation between the complainant and the respondent that seeks to acknowledge harm, promote repair, and understanding while preserving the safety and dignity of all parties.

In an event that allegations of sexual assault, sexual harassment or gender-based violence against a staff member are substantiated, the outcome will be determined in accordance with the Staff Code of Conduct and contract agreements.

9.1 Reporting to the police or other external agency

A person who experiences incident(s) of sexual assault, sexual harassment or gender-based violence is encouraged to report the matter to the police. Responsibility for prosecuting criminal acts of sexual assault, sexual harassment or gender-based violence rests with the local police where the offence occurred.

A person who has experienced incident(s) of sexual assault, sexual harassment or gender-based violence can choose to report this to the local police, the Human Rights and Equal Opportunity Commission (NSW), the Australian Human Rights Commission (Cth), and/or to the Commonwealth Ombudsman.

It is for the complainant to decide whether they report the matter to the police or other external agency. ASA will respect the complainant's decision in this regard and will provide information

and support to the complainant whether they report the matter to the police or external agency.

ASA will only report disclosures and reports of sexual assault, sexual harassment or gender-based violence to the police with the consent of the complainant, except in circumstances where ASA has a duty of care or is otherwise required by law (e.g. where the conduct is related to a child or young person and falls within the scope of mandatory reporting requirements of state legislation).

Where ASA has a legal requirement to report to an external agency other than the police (e.g. Independent Commission Against Corruption (ICAC) or other regulatory agencies) this will be managed in accordance with the agency's provisions for reporting.

When reporting any disclosures or reports to the police, or other external agency, ASA will only provide the relevant information as is required by law or as necessary for action to be taken.

If a report is made to both ASA and the police or an external agency, ASA may be required to suspend any internal investigation pending the outcome of the external process. ASA will continue to make support resources available whilst waiting for the outcome of any external investigation.

ASA reserves the right to implement interim measures to safeguard the complainant, respondent, and other members of the ASA community following consultation with the police.

9.2 Right to withdraw a disclosure or a report

A complainant has the right to withdraw a disclosure or a report at any stage of the process. However, ASA may continue to act on the disclosure or report to ensure the safety of the complainant and members of the ASA community.

10. Review and appeal

Where the complainant or respondent is a student, they are dissatisfied with the management of the disclosure or report, or in the event of dissatisfaction with the outcome of any review, they can contact the Commonwealth Ombudsman.

Where the complainant or respondent is a staff member and they are dissatisfied with an action or decision of ASA, they should refer the matter to Fair Work Australia.

If the complainant or respondent is a student and believes that ASA has breached one of the Higher Education Standards Framework (Threshold Standards) 2021, they can submit a complaint to TEQSA or to the Commonwealth Ombudsman.

11. Relevant HESFs

This Policy and the associated Procedure comply with the Higher Education Standards Framework (Threshold Standards) 2021. The following are relevant excerpts and specify that:

Standard 2.3 Wellbeing and Safety

1. All students are advised of the actions they can take, the staff they may contact and the support services that are accessible if their personal circumstances are having an adverse effect on their education.
2. Timely, accurate advice on access to personal support services is available, including for access to emergency services, health services, counselling, legal advice, advocacy, and accommodation and welfare services.
3. The nature and extent of support services that are available for students are informed by the needs of student cohorts, including mental health, disability and wellbeing needs.
4. A safe environment is promoted and fostered, including by advising students and staff on actions they can take to enhance safety and security on campus and online.

5. There is a critical-incident policy together with readily accessible procedures that cover the immediate actions to be taken in the event of a critical incident and any follow-up required.

12. Version Control

This Policy and Procedure has been reviewed and approved by the ASA Board of Directors as at January 2024 and is reviewed every three years.

This Policy and Procedure are published and available on the ASA website
<https://www.asahe.edu.au/policies-and-forms/>.

Change and Version Control				
Version	Authored by	Brief Description of the changes	Date Approved:	Effective Date:
2024.2	Project Officer	Document formatting updated to reflect change of Trading Name to ASA Institute of Higher Education	28/06/2024 by CEO	01/07/2024
2024.1	Director Learning and Innovation	Updated policy to include HESF references, changes in regulatory compliances. Benchmarked against 6 other Higher Education Providers.	29/01/2024	29/01/2024
Previous version archived. New Policy code and numbering system implemented.				
1.0		Board of Directors approval	30/04/2021	