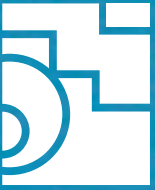**Universities Scotland**

Changing the Culture: 7 years on

A progress report on universities' work to prevent and address harassment in the student community

Foreword

As Cabinet Secretary for Education and Skills, I am absolutely committed to eliminating discrimination, prejudice, hatred and violence against women and girls in places of education. Scotland's universities should be safe places where students and staff can bring their whole selves to live, study, teach and work without fear.

Through the Equally Safe Strategy, the Scottish Government, together with partners from a range of sectors, are working together to eradicate violence against women and girls in Scotland. Universities are a vitally important partner in this agenda, and I commend the long-term commitment that students, staff and leaders in Scotland's universities have made and are making to a very comprehensive programme of anti-harassment work within the student community. Strong and transparent leadership is vital to make a difference but so too is the need to listen and respond to lived experience and the needs of the student community.

I welcome this progress report which shows that over the last five years, this agenda is increasingly led by those within a university's executive team, with more oversight from governing bodies. I also welcome the data showing that 95% of institutions have worked with their student and staff bodies to develop their strategic approach to anti-harassment and that more than 60% have engaged with those with lived experience. I expect to see this continue going forward.

"The progression of learners through different levels of education means that the responsibility to build and maintain a safe, fair and inclusive culture is an ongoing one for our schools, colleges, universities and for the Scottish Government. I look forward to continuing this deeply important partnership approach."

**Jenny Gilruth MSP
Cabinet Secretary for Education and Skills**

Preface

Universities strive to be inclusive, safe and respectful places for their students, staff and visitors. There is no place for harassment or intimidation within our institutions.

Back in 2016 Universities UK launched *Changing the Culture* as a strategic approach to address all forms of misconduct in the student community.

This is the second report on Scotland's progress with that agenda, following up on *Changing the Culture: Two Years On* which came out in 2019. I am delighted to see progress on such a significant scale since then.

Sadly, we know that not everyone in our institutions has an experience at university that is respectful and safe. Institutions have a responsibility to listen to their students, staff and particularly from survivors to learn from their lived experience. There are many examples of positive change occurring thanks to the courage of survivors in speaking out. We applaud the bravery of those who choose to do so, and to recognise their achievements, but also note that further progress should not rest so heavily on their shoulders.

Amongst the highlights in this report, the increasing seniority of leadership of this agenda as a very positive development. Institutions have also overwhelmingly adopted trauma-informed approaches in support of their students.

Overall, the data returned by higher education institutions forms a picture of organisations which remain deeply committed and highly active in delivering against a strategic approach in *Changing the Culture*.

**Professor Iain Gillespie
Convener, Universities Scotland
Principal & Vice Chancellor
The University of Dundee**

A university community is not a bubble; the wider societal, and global context in which universities operate is very relevant and ever changing.

The violence seen on the streets of England and Northern Ireland this summer, from a dangerous minority of people, has been a devasting reminder.

Geopolitical events, such as the terrorist attack on Israel and the Israel-Gaza war are felt immediately and deeply personally by our Jewish and Muslim communities, our Israeli and Palestinian students and staff, and by those who want an immediate humanitarian ceasefire in Gaza. The debate around trans-rights has also become deeply divisive in Scotland and the rest of the UK.

We condemn racism, Islamophobia, antisemitism, transphobia and violence against women in all its forms. It is important to say so as leaders, because hate should not be the louder voice.

Scotland's universities are vibrant, stimulating and successful because they are a place for talented people of all races, faiths, nationalities, genders and those with none, to come together to study and work. We are thankful for that diversity, and we will keep working to do all we can to support it.

The data show universities have driven forward a significant programme of work over the last five years. There is no complacency from our institutions. The work continues.

**Sir Paul Grice
Vice Convener, Universities Scotland
Principal & Vice Chancellor,
Queen Margaret University Edinburgh**

Executive summary & key findings

It is important to report on progress on Scottish universities' strategic commitment to tackle all forms of harassment, including gender-based violence and hate incidents related to the protected characteristics, as it has been five years since the last report in 2019.

Changing the Culture was launched by Universities UK in 2016, so the strategic approach has been running in institutions for eight years. This report is structured according to the four "pillars" of *Changing the Culture* so that it is consistent with the findings in the last analysis of progress in 2019, *Changing the Culture: Two Years On*. This Framework pre-dates the Scottish Government's Equally Safe Strategy for higher education and further education (2018), which also actively informs universities' approach to gender-based violence.

The data reflect a considerable amount of work undertaken in that time and show that significant progress has been made.

Areas of greatest progress over the last five years

Leadership

- There has been a significant increase in the seniority of leadership of the anti-harassment agenda within our institutions over the last five years. This responsibility is held at Executive Team level in 68.5% of institutions in 2024, compared to 41.7% in 2019. This is a direct response to the *Changing the Culture* recommendations.

- Universities' governing bodies now have regular oversight of this agenda in 89% of institutions (2024) compared to 54% in 2019. The 2019 report said there was scope for closer connections to, and oversight from, Courts. That has been acted on.

Survivor and student-focused

- 63% of institutions have worked with survivors and those with lived experience to inform their strategic approach to anti-harassment, up from only 33% who indicated they did so in 2019.

Primary prevention

- Institutions set behavioural expectations through multiple channels, in official policies (100%), in student codes of conduct (95%) and in student-focused campaigns (74%). There has been a big increase in the number of institutions which communicate behavioural expectations to students in their pre-arrival information, with 63% doing so in 2024, compared to 46% in 2019.

- Training opportunities for the student and staff community is a strong feature of institutional approaches in both 2019 and 2024. In 2019, 62% of respondents offered bystander training to students and 69% offered consent training. By 2024, 95% of all institutions have delivered student training since 2019, with more than two-thirds making this at least an annual occurrence.

Secondary prevention

- There has been a widespread move to adopt trauma-informed processes for student misconduct, with 79% of HEIs now doing so and 74% having done so since 2019. 79% of HEIs now have policies that allow for preventative suspension.

- In 2019, 69% of respondents were offering staff training, which has risen to 100% in 2024, with 74% making this at least an annual occurrence.

Increased ease of reporting

- 89% of institutions have a dedicated reporting tool in place in 2024 (in addition to other mechanisms for reporting, such as in-person) compared to less than a third in 2019.

Inclusion

- Universities' approaches over the last decade can be characterised by collaboration with students, staff and third-sector organisations. This remains the case, with 95% of institutions having ensured involvement of their student and staff bodies closely followed by 79% working with third-sector organisations and a respective 63% involving police and making most of the expertise gained from local and regional partnerships.

A comment on resourcing

Every institution in Scotland is committed to the safety and wellbeing of their students and every institution is making strides on their journey as evidenced by the progress set out in this report. No institution is in receipt of public funds specifically to support primary or secondary prevention, which means that wider funding pressures in the sector and relativities of institutional income and efficiencies of scale based on institutional size (using student population as a proxy) are unavoidable factors.

72% of all institutions, regardless of size, identified funding pressures as a problem to further progress (Fig 12). However, there was a strong correlation between institutional size and the likelihood that funding pressures were identified as an obstacle to progress. The percentage identifying this as an obstacle rises to 83.3% amongst institutions with a student community of fewer than 10,000 people (headcount) and to 80% or more for institutions with an income of less than £250 million.

Reflecting on progress already achieved, there were strong correlations between size, based on both income and student population, and the likelihood that resources had been invested to support this agenda. On average, 77.8% of institutions have made investments in this area since 2019 but this figure was 100% for institutions with a turnover in excess of £250 million, falling to 80% and then 50% for institutions with turnovers of £101-£249m and less than £100m respectively. This same pattern applies if we use student population size as an indicator. 100% of institutions with a student population of over 10,000 have invested resources and only 33% of those with fewer than 10,000 students have been able to do so.

As with all areas of their activity, institutions seek to work in ways that are efficient and effective. Universities are highly active collaborators on this agenda; both with each other and with colleges and other partners (as shown in responses to Fig 3) although clearly when it comes to student safety and wellbeing, efficiency is not the primary motivation.

Methodology

Universities Scotland commissioned *Research Resource* to undertake the data collection and analysis using a quantitative and qualitative survey. The survey question development was led by Universities Scotland with input from the Convener of the Universities Scotland Secretaries Group (Chief Operating Officers) and AMOSSHE Scotland, representing the Heads of Student Services.

The survey questions were kept the same, where possible, as those asked of institutions in the *Changing the Culture: Two Years On* survey from 2019, to allow presentation of some of the data longitudinally.

The survey was undertaken utilising an email methodology and Snap survey software for survey design and data collection. The initial mailing was sent to all 19 institutions on the 1st of March 2024, with reminder mailings sent on the 8th and 18th of March 2024.

A total of 19 surveys were completed by higher education institutions (HEIs), representing a 100% response rate of all universities in Scotland and Universities Scotland's membership. This compares to a response rate of 84% of the institutions surveyed in the 2019 report. The data is presented in aggregate to respect institutional anonymity.

Two questions were asked as proxies for institutional size: total institutional income and student population (headcount).

Two open-text questions were asked of institutions, one in regard to approaches to staff training and one to collect wider examples of good practice in primary or secondary prevention. Institutional responses are shared throughout this report as case studies.

Universities UK and Universities Scotland had been tracking progress in parallel.

We both published *Two Years On* reports in 2019. In 2024, this report for Scotland stands on its own. Universities UK has not surveyed institutions in the rest of the UK. However, universities in England will now be working closely with the Office for Students to comply with new requirements on harassment and sexual misconduct.

The terms universities, higher education institutions, institutions and the higher education sector are used interchangeably throughout this report.

Delivery and support at a Scotland and UK level

The work of individual institutions is supported by collaborative projects at regional and national (both Scotland and the UK) level.

Universities UK's leadership and long-term commitment to the *Changing the Culture* framework has been fundamental, with multiple resources and guidance documents published since then to support institutions' work on the prevention and intervention of sexual misconduct, all forms of harassment and to promote wider student wellbeing.

Prevention of gender-based violence in HE is also aligned to the Scottish Government's *Equally Safe Strategy*, which was refreshed in 2023, and the Equally Safe for Colleges and Universities agenda, which began with the 2018 launch of the Equally Safe Toolkit. The Scottish Government convenes the Equally Safe Core Leadership Group (established in August 2021 as an evolution of the earlier Ministerial Working Group) which codifies a partnership approach in post-16 education and sets an annual work programme. The university sector

is represented on that group by: Universities Scotland; AMOSSHE, the student services organisation; the UHRS, representing senior HR professionals in HE; and, NUS Scotland to represent the student voice. Organisations representing survivors and women/girls are also amongst the membership.

Individual institutions have also benefited immensely from the work and collaborative approach of specialist organisations. They include, but are not limited to: EmilyTest, Rape Crisis Scotland and Advance HE.

A series of regional collaborations, focused on the prevention of gender-based violence, have developed since 2019. Some collaborations operate under the "Fearless" moniker (Fearless Glasgow, Fearless Edinburgh) with others working to much the same objectives but under different names. Such collaborations include universities and colleges, violence against women and girls organisations and often representatives of the nighttime economy and the police.

Delivery at a national level since 2019:

This list below primarily reflects work led by Universities UK and Universities Scotland, working on behalf of institutions. It does not reflect key contributions to anti-harassment work led by other important partners in this space. However, we would like to acknowledge and note the sector's appreciation of the work, support and expertise of many important organisations.

Nov 2019

All of Scotland's universities adopt a commitment on the use of confidentiality clauses, agreeing that it would be "wholly unacceptable" to use confidentiality clauses (aka NDAs) to prevent victims/survivors from speaking out. EmilyTest campaigned for a ban on NDAs and the pledge was led by Universities Scotland.

2020

COVID-specific student-facing gender-based violence (GBV) support information published and circulated to students to respond to the increased GBV risk posed by a lock-down. Initiated by calls from the EmilyTest and delivered as a collaboration between EmilyTest, Advance HE, SFC and Universities Scotland.

Aug 2020

All of Scotland's universities stand united against racism, in a statement made by Principals in partnership with Advance HE, as part of work in response to the 2019 Universities Challenged report from EHRC.

2020

Tackling Racial Harassment in HE. Universities UK.

2020

StepChange: Mentally Healthy Universities. Universities UK.

2021

Tackling Antisemitism: Practical Guidance for Universities UK.

March 2021

EmilyTest launches the world's first GBV Charter for colleges and universities. A co-created, research-based framework focused on minimum standards for GBV prevention, intervention, and support.

2021

The SFC publishes a suite of Advance HE resources, *Let's Talk About Race*, to support colleges and universities respond to the 2019 EHRC enquiry into racial harassment in HE.

2021

Domestic Abuse (Protection) Act (Scotland).

July 2021

Tackling Racism and Racial Harassment: A Directory of Initiatives at UK Universities. Universities UK.

Dec 2021

#CombatMisconduct: a Toolkit for Vice Chancellors. Universities UK, AVA & NUS.

2022

Tackling Islamophobia and Anti-Muslim Hatred: Practical Guidance for Universities. Universities UK.

2022

Tackling Staff to Student Sexual Misconduct. Universities UK.

2022

Scottish Government convenes a Roundtable of relevant partners to address a concerning rise in the risk of spiking. The Roundtable has met biannually since then.

2022

Spiking: What Universities Can Do. Universities UK.

2023

Tackling Racial Harassment in HE: Progress since 2020. Universities UK.

2023

Sharing Personal Data in Harassment Cases. Universities UK.

Nov 2023

An announcement that Scotland's universities have agreed a consistent way of collecting and processing student data on unspent, relevant criminal convictions in the interests of student safety. This responds to calls from campaigners including EmilyTest and Ellie Wilson. Guidance for universities is being developed by Universities Scotland and is expected by late November 2024.

2024

How to Handle Student Misconduct Case Studies. Universities UK.

. . . .

PILLAR 1

The role of the senior leadership team

Work to prevent and address all forms of student misconduct is taken very seriously by universities. This is reflected in the seniority with which this agenda is led within institutions.

A member of the executive team has strategic leadership for this work in the vast majority of institutions (68.5%). The executive team normally comprises the Principal and Vice Chancellor or Director, Provosts, Vice-Principals and the Secretary/Chief Operating Officer.
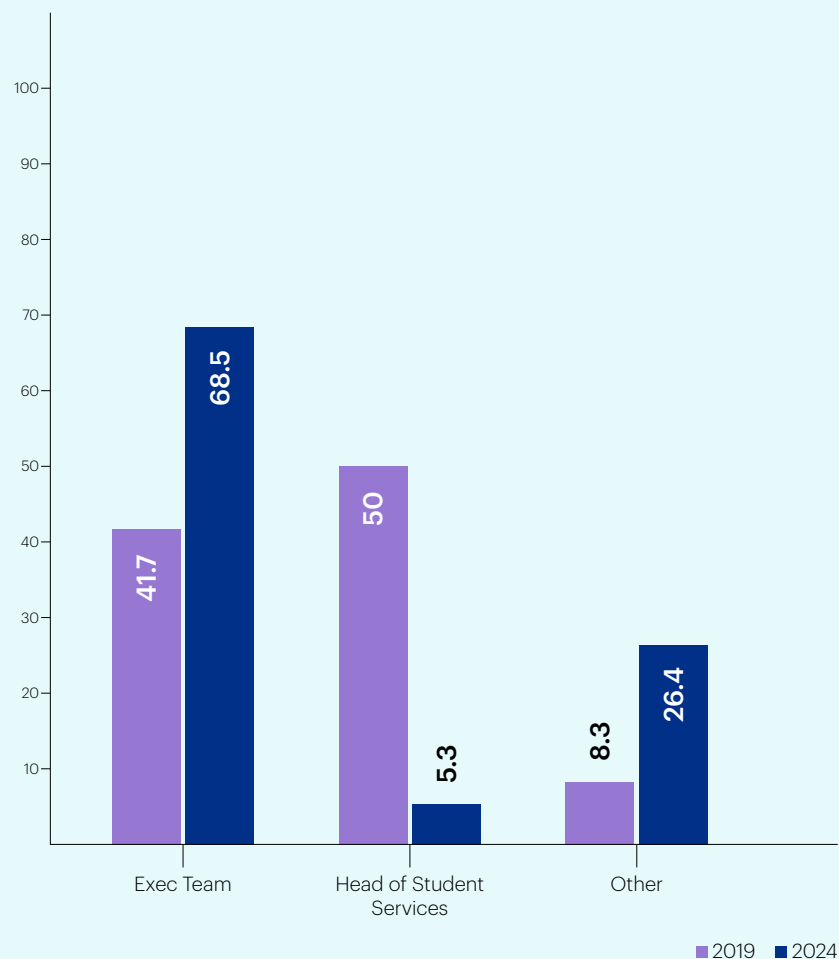
Just under a third of institutions (32%) said a Vice Principal or equivalent post-holder was strategically accountable for this agenda, 16% said it was the Principal or Director and 16% said it was the Chief Operating Officer or Secretary (16%).

This represents an increase in the seniority of leadership of this agenda within institutions over the last five years as more than two-thirds of institutions now lead this from within the executive team, compared to under half in 2019. This has been a conscious decision within institutions, linked to an understanding of the need for visible leadership to affect the kind of culture changes needed to make a meaningful difference.

This is echoed by a 95% of institutions reporting that securing senior management buy-in has formed part of their approach to progressing this agenda since 2019 (see Fig 4).

Fig 1
Who is accountable, at a strategic level, for delivering on this area of activity for the institution? (%)

- Exec Team: 41.7 (2019), 68.5 (2024)
- Head of Student Services: 50 (2019), 5.3 (2024)
- Other: 8.3 (2019), 26.4 (2024)

■ 2019 ■ 2024

Over the last five years, there has also been a notable increase in the engagement of university courts or governing bodies with the anti-harassment work of the institution, with 89% of institutions providing periodic updates to their court in 2024 compared to 54% in 2019.

Fig 2
Does your institution give periodic strategic updates on this programme of activity to your Court/governing body? (%)


- Yes: 54 (2019), 89 (2024)
- No: 46 (2019), 11 (2024)

■ 2019 ■ 2024
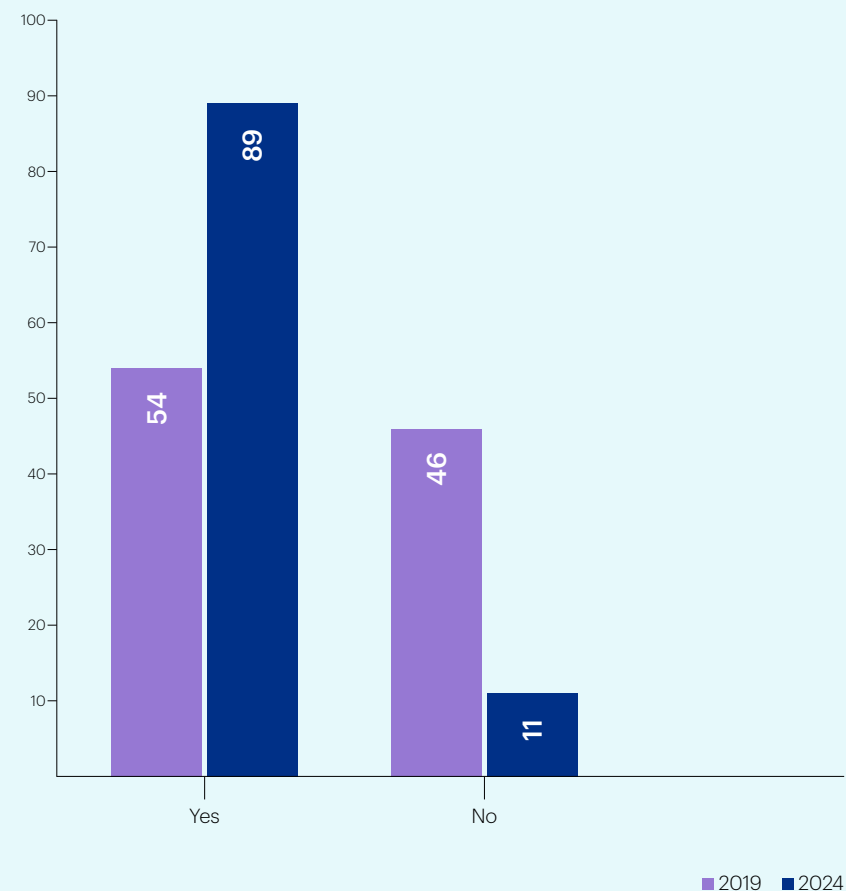
GOOD PRACTICE
Collaboration with stakeholders

The growth in institutional leadership for this agenda has resulted in more training for staff with some specifically aimed at senior managers.

The **University of St Andrews** launched an intensive management programme in 2023–24 which aims to improve management capability and a better understanding of the manager's role and responsibilities especially with regard to the duty of care of staff. By August 2024, 22% of identified line managers will have completed the programme. The aim is to have all new joining managers complete the programme and all other existing managers complete by 2025.
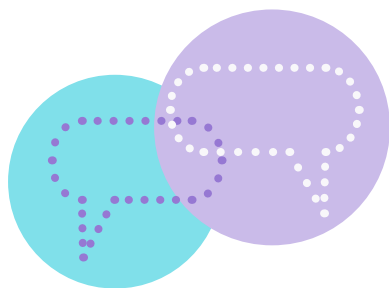
PILLAR 2

An institution-wide approach

Changing the Culture **strongly encouraged the adoption of an institution-wide approach as pillar 2 of the Framework. 74% of institutions say they are working in that way (Fig 4).**

Collaboration

The Strategy encouraged institutions to form partnerships in support of anti-harassment as this is fundamental to getting the right expertise built into the approach. This was the modus operandi in 2019 and has continued to be so.
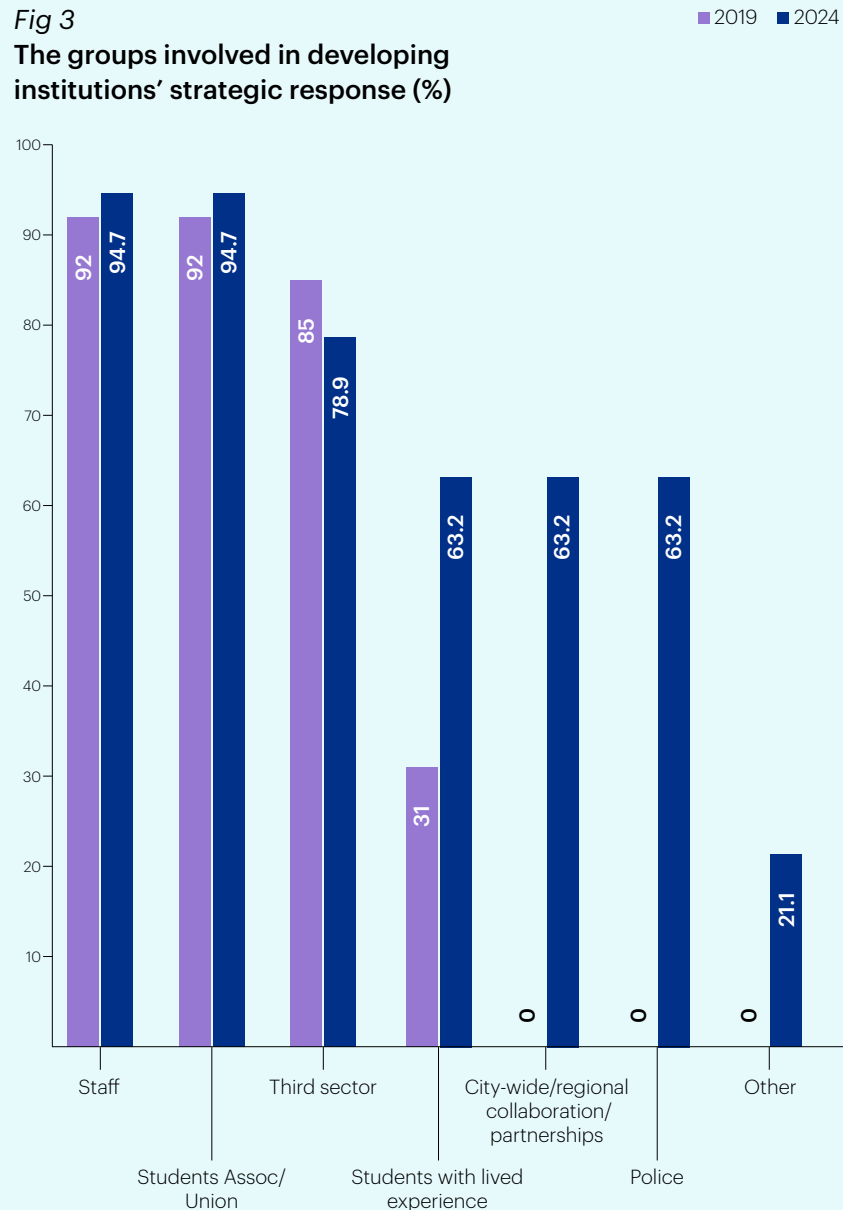
Staff and students continue to be at the heart of the partnership approach, with 95% of institutions indicating so (and 89.5% specifically noting partnerships with their Students' Union, Fig 3). Notably, almost two-thirds of institutions (63%) now report that they engage with students with lived experience. The way the question is phrased changed between 2019 and 2024 surveys so it's not possible to make a direct comparison although we can note that in 2019, 31% of institutions said they engaged with reporting/responding students (people who have lived experience) on their strategic approaches.

Working with people with lived experience to inform institutional approaches is strongly encouraged as good practice. It is important to approach this very sensitively, and on terms appropriately sensitive to survivors, in order to avoid re-traumatisation.

In 2024, 79% of institutions, or 15 institutions, are working strategically with third-sector organisations. This compares to 11 institutions in 2019 (Fig 3). Amongst the third sector and/or specialist organisations worked with, ten of thirteen respondents said that they worked with Rape Crisis and the same number said they had engaged with EmilyTest in various ways. These two organisations were mentioned most frequently amongst a total of 23 different organisations that fit into this category, which includes NUS Scotland, Women's Aid, Advance HE, the Union of Jewish Students, LGBT Youth Scotland and White Ribbon.

Fig 3

The groups involved in developing institutions' strategic response (%)

■ 2019   ■ 2024

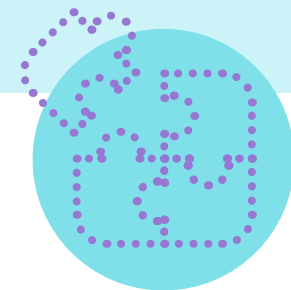| Group	2019	2024
Staff	92	94.7
Students Assoc/Union	92	94.7
Third sector	85	78.9
Students with lived experience	31	63.2
City-wide/regional collaboration/partnerships	0	63.2
Police	0	63.2
Other	0	21.1

GOOD PRACTICE
Regional collaborations: Fearless Glasgow

Fearless Glasgow was established in 2019, based on the Fearless Edinburgh blueprint as a regional consortium of organisations. The aim of the group has been to work collaboratively on preventing and responding to gender-based violence within the tertiary education system across Glasgow and the West of Scotland.

With a membership consortium of twelve colleges, universities and higher education institutions, alongside third sector members, and public sector organisations such as Police Scotland, NHS Greater Glasgow and Clyde, and Glasgow City Council, the partnership recognised the need for an online reporting tool which could facilitate named and anonymised reports of gender-based violence across the university and college sectors.

This collaborative approach to gender-based violence prevention and response has resulted in additional successes such as sharing good practice, ideas and resources, delivery of the EraseTheGrey campaign across multiple member institutions, and aligned definitions and understanding of the harms caused by gender-based violence across Glasgow and the West.

GOOD PRACTICE

Collaboration with stakeholders

Government advice to 'stay at home' during COVID-19 does not apply to you if home is not a safe place.

If you don't feel safe, we can help.

www.endGBV.uk
In an emergency call 999

The national lockdown in 2020, imposed by the Scottish and UK Governments for public health reasons in response to the coronavirus pandemic, heightened the risk of domestic violence and other forms of gender-based violence such as coercive control and stalking, as victims/survivors were potentially more isolated during this time. EmilyTest highlighted the implications for students in college and university and called for a sector-specific response.

Multiple stakeholders adapted existing student-facing digital resources to suit the circumstances, to emphasise the message of prioritising physical and psychological safety, even during lock down restrictions, and to sign-post relevant resources.

The collaboration included EmilyTest, Advance HE, Universities Scotland and Colleges Development Network. The project was funded by the Scottish Funding Council (SFC).
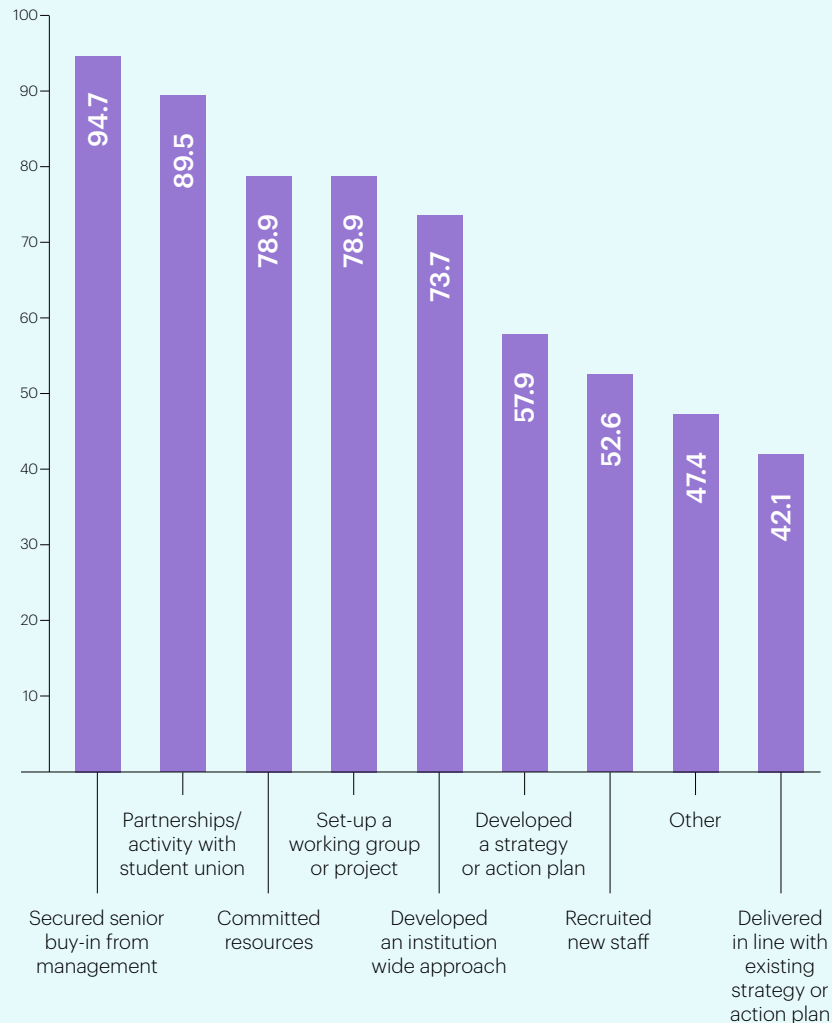
Holistic approaches

Other institutional activities in support of primary and secondary prevention have included the commitment of additional resources, with 79% of institutions reporting they have done so since 2019 and, just over half (52.6%) of institutions saying they have recruited new staff to deliver on it (Fig 4). There has been no public funding support made available to higher education institutions to tackle all forms of harassment or deliver on the Equally Safe Strategy since 2019/20.

Therefore, institutions' work to deliver on the anti-harassment agenda must be found within existing institutional budgets. This is challenging given there is a long-established pattern of underfunding higher education in Scotland which has led to a 20% real-terms fall in public investment in every Scottish-domiciled undergraduate place, equivalent to £1,900 less per student in public funding now, compared to 2013/14.

Fig 4
How has your institution taken forward work to address harassment since 2019? (%)

Category	Value
Secured senior buy-in from management	94.7
Partnerships/activity with student union	89.5
Committed resources	78.9
Set-up a working group or project	78.9
Developed an institution wide approach	73.7
Developed a strategy or action plan	57.9
Recruited new staff	52.6
Other	47.4
Delivered in line with existing strategy or action plan	42.1

Policy and process

The data returned by institutions indicate significant output in regard to new policies and procedures to address student misconduct since 2019.

For example, in 2019, 69% of respondents had implemented or tested updating student discipline procedures compared to 84% of institutions in 2024 who have now done this (Fig 5). With regards to updating the student code of conduct, 54% had implemented or tested this in 2019 compared to 84% who had undertaken this prior to or since 2019. Adopting a zero tolerance culture across institutional activities has also seen an increase in activity increasing from 54% of respondents in 2019 to 72% in 2024.

The responses also point to the fact that institutions are all on a continuous journey with the anti-harassment agenda, and may choose to prioritise certain activities differently, according to need or context. Whilst 71% of institutions have updated their policy on staff-student relationships, another 18% indicate that it is in their future plans to do so. There may be a correlation to the 2022 UUK Guidance, which strongly discouraged close personal relationships between staff and students as part of new guidance: *Tackling Staff to Student Sexual Misconduct*, as part of the *Changing the Culture* strategic programme.
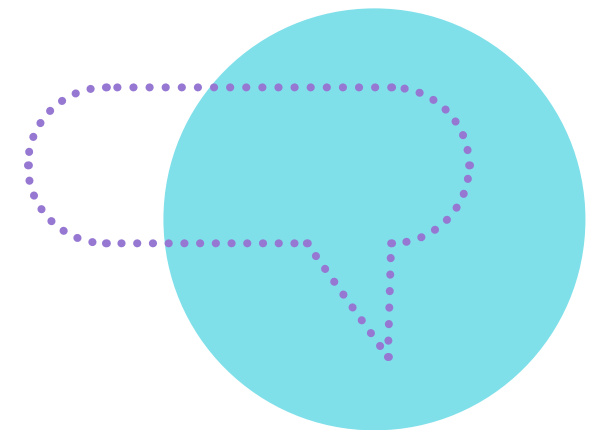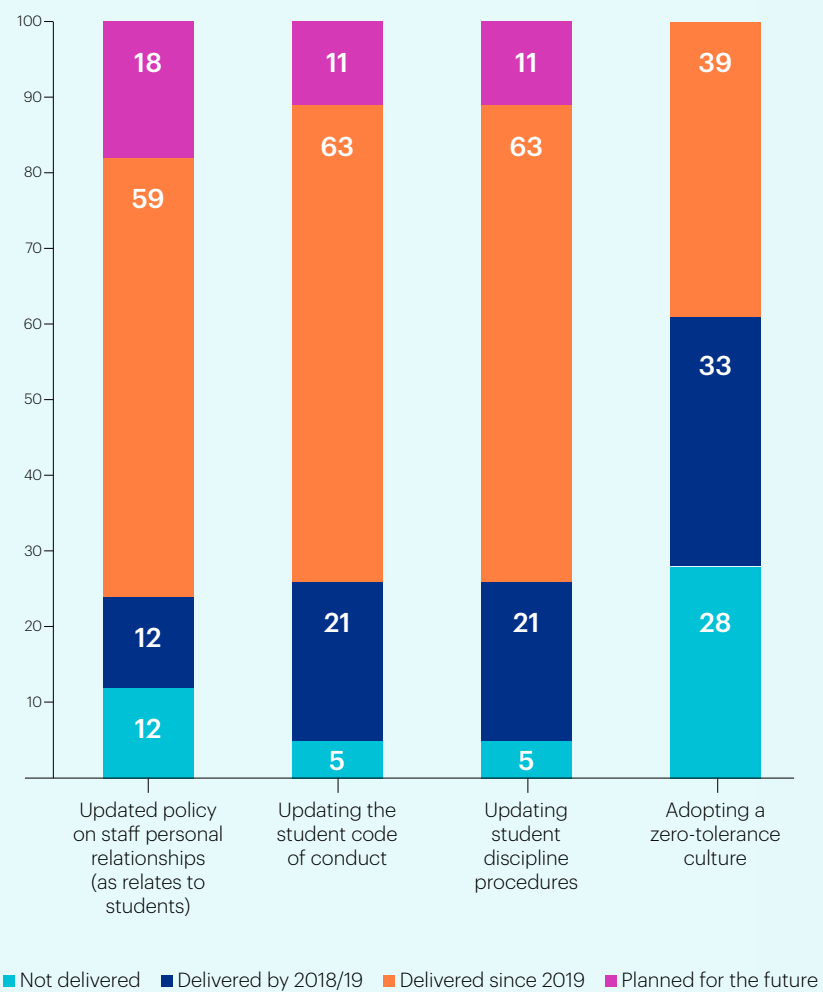
Fig 5

Activity implemented to strengthen institutional approaches to tackling harassment in the student community (%)

Activity	Not delivered	Delivered by 2018/19	Delivered since 2019	Planned for the future
Updated policy on staff personal relationships (as relates to students)	12	12	59	18
Updating the student code of conduct	5	21	63	11
Updating student discipline procedures	5	21	63	11
Adopting a zero-tolerance culture	28	33	—	39

■ Not delivered   ■ Delivered by 2018/19   ■ Delivered since 2019   ■ Planned for the future

PILLAR 3

Preventative actions

Universities work hard on a range of preventative measures to create a culture where students are safe and supported. Part of that is setting expectations about acceptable and unacceptable student behaviours from the outset.

Every university (100%) sets this out in their official policies which are available online and in print. However, the vast majority go far beyond this, employing a range of techniques to communicate unacceptable behaviours to students. 95% of institutions have a code of conduct for students and three-quarters (74%) promote this actively through campaigns and student-focused websites.

Notably, there has been an increase in the number of institutions relaying behavioural expectations to students before arrival and as part of induction/orientation activities. 68% of universities recorded that they formalise some form of communication on this to their students as part of their matriculation or induction processes, (up from 46% in 2019) with less than one third (32%) advising they do not.

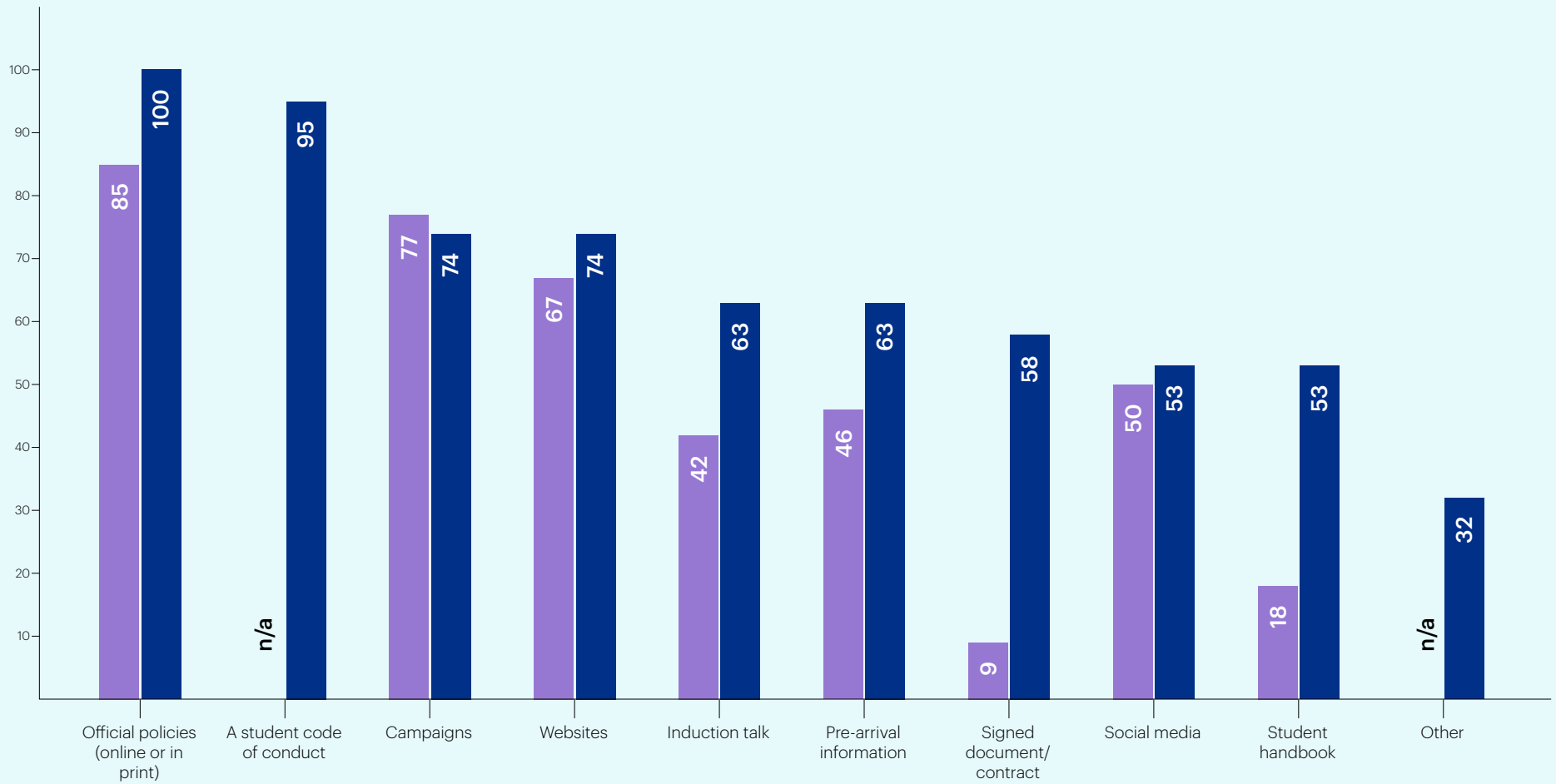From the detail provided, we can share that:

- 58% of institutions now use signed documents or contracts with their students to cover this, compared to just 9% in 2019,
- 63% make proactive use of induction talks in 2024 compared to 42% in 2019 and,
- 63% also convey messages to students in their pre-arrival information in 2024 compared to 46% in 2019.

Fig 6
Approaches taken to set behavioural expectations of the student community (%)

Legend: 2019, 2024

Approach	2019	2024
Official policies (online or in print)	85	100
A student code of conduct	n/a	95
Campaigns	77	74
Websites	67	74
Induction talk	42	63
Pre-arrival information	46	63
Signed document/contract	9	58
Social media	50	53
Student handbook	18	53
Other	n/a	32

The 2019 report noted how challenging it can be to get successful traction through student-facing communications during student enrolment periods as there is so much information being conveyed in a short space of time. As such, it would be helpful if institutions shared good practice, based on their evaluations of the most effective approaches to communication.
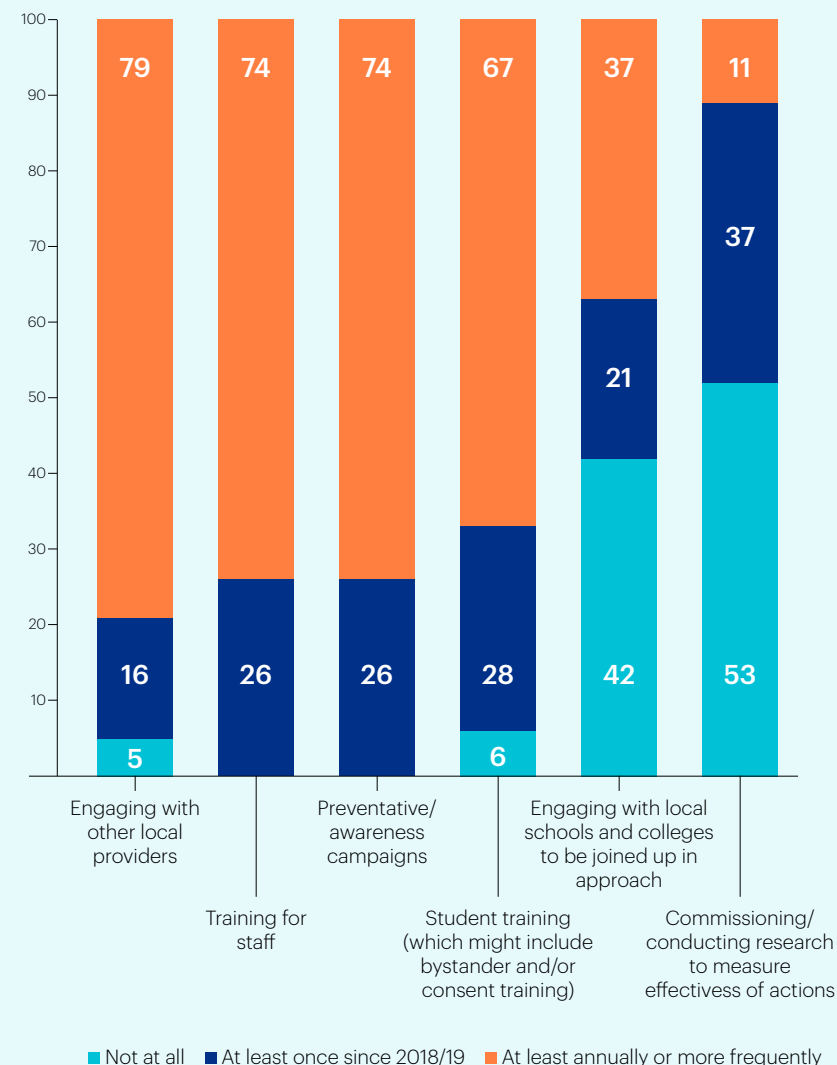
Raising awareness within the student community

Building on the communication of expected behaviours, universities invest in a range of wider activities to frame and reinforce such expectations and to give tangible effect to the culture that institutions are working hard to create.

95% of institutions have delivered training, in the form of bystander or consent training to students since 2019 (in 2019, 62% had delivered bystander training and 69% had delivered consent training for students), with more than two-thirds of institutions doing so at least annually. Whilst this is a huge undertaking, the highly transient nature of the student population (with some postgraduate-taught students only studying for one year) means there is a strong argument to doing this annually.

Where bystander or consent training is delivered for students, the vast majority of institutions (73%) make this available on an optional basis, with 27% making it mandatory. It would be interesting to learn from the experience of those institutions involved in mandatory training whether this approach is judged to be successful. This picks up on a low response rate on the commissioning of research to understand the effectiveness of approaches taken, with only 37% of institutions indicating they have done so since 2019. The 37% figure may be a reflection of the way the question was framed, which may have been understood to mean research in the academic sense, rather than evaluation.

Fig 7
Preventative measures introduced to support student safety and wellbeing (%)

Legend:
- Not at all
- At least once since 2018/19
- At least annually or more frequently

Data by category:
- Engaging with other local providers: 5, 16, 79
- Training for staff: 26, 74
- Preventative/awareness campaigns: 26, 74
- Student training (which might include bystander and/or consent training): 6, 28, 67
- Engaging with local schools and colleges to be joined up in approach: 42, 21, 37
- Commissioning/conducting research to measure effectiveness of actions: 53, 37, 11

GOOD PRACTICE
A whole institution approach

Glasgow Caledonian University established the EraseTheGray campaign following consultation with students, staff and external stakeholders.

Through collaborative working with colleagues across the university including student wellbeing, equality and diversity, governance, security and the student body, the University identified the need for a campaign that could raise awareness of the issues, challenge prevailing myths and problematic attitudes that surround gender-based violence, signpost to the support available for those who need it and help promote a positive culture change on campus.

Students on the University's 'Design for Change' course module co-produced the campaign's design. Multi-award winning since its creation, the EraseTheGrey campaign has a toolkit of resources which is available free of charge to other organisations.
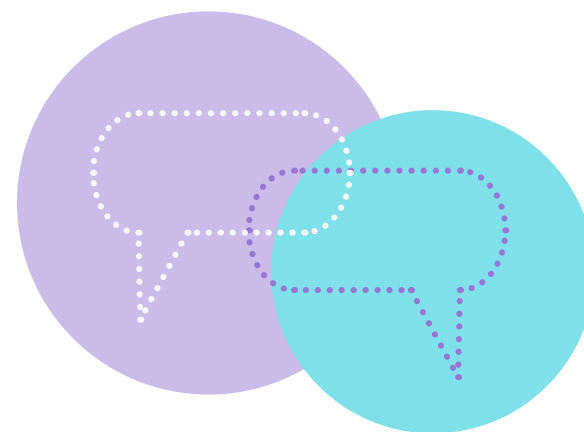
Staff training

Every institution in Scotland has trained staff in support of this agenda over the last eight years (69% in 2019) with 74% of institutions saying they now do so at least annually (Fig 7).

Despite the challenges, institutions are innovative in their approaches to training by:

- undertaking surveys to assess training needs and inform training planning,
- targeting specialist groups of staff across their institution who cascade learning to other groups of staff/students e.g. student facing staff,
- choosing when training is most impactful e.g. part of staff induction/onboarding,
- choosing cost-effective modes of delivery e.g.in-house training, online courses etc, and
- providing anti-harassment information in pre-arrival materials or including it in students' matriculation processes etc.

Given institutions' prioritisation of training, many are seeing this as an area for development and are taking an increasingly more strategic approach to it to increase capacity and mandatory elements.

GOOD PRACTICE
Staff training and evaluation at the Universities of Stirling, Strathclyde, Edinburgh and the Glasgow School of Art

The **University of Stirling** has made staff training and awareness key themes running throughout the University's Equality, Diversity and Inclusion (EDI) Strategy. All new staff members are required to undertake a number of online training courses as part of the University's comprehensive staff induction process. Staff in student-facing roles across a wide range of departments take mandatory first responder and welfare referral training.

The University measures the impact the training has had on staff understanding of how to support a student in relation to a welfare concern, including harassment and GBV. For example, pre-session, 17% of staff agreed they had a good understanding of the Sexual Violence and Misconduct Liaison Officer role at the University. Following the session this rose to 95%.

Similarly, the **Glasgow School of Art** is also evaluating its current provision of both mandatory and optional training for its staff by including specific questions in its annual staff survey related to equality outcome reporting in order to guide the School's staff development plan for academic year 2024/25.

Although many of our institutions are increasing their capacity of training provision, some focus their efforts by targeting specialist groups of staff who then often cascade the learning to other staff groups. In the case of **Strathclyde**, the University has expanded its training capacity within the Access, Equality and Inclusion (AEI) Service. It has employed two new Equality and Diversity Engagement Officers and a Senior Race Equality Officer within the past 12-24 months who contribute to training to ensure an intersectional lens is applied. Training capacity has also increased via a new partnership agreement with Glasgow and Clyde Rape Crisis.

The **University of Edinburgh** has an intensive, mandatory training programme for its student conduct case handlers, who also receive investigator training from external legal experts, training on trauma-informed investigations and, online synchronous training on antisemitism awareness. Student conduct case handlers are responsible for maintaining a record of their completed training, for going on to train the staff members on the University's student discipline committee and they also provide briefings on the process to other staff groups.

EmilyTest has developed a L.I.S.T.E.N. risk assessment tool and training for staff, which is focused on equipping all staff with the skills to respond safely and responsibly to students disclosing gender-based violence. With a focus on student disclosures, this structure is simple: receive the disclosure, share that information, and ensure the student is safe. The training consistently receives positive feedback from participants who consider it an effective way to develop direct skills in only two hours. Some universities have delivered this to hundreds of their staff. EmilyTest has transitioned the L.I.S.T.E.N. risk assessment training into a train the trainer model, which is now being made available to other institutions in the UK as part of a rollout.

PILLAR 4

Effective strategies for response

Fig 8 gives a good indication of where the Scottish sector stands across a range of intervention measures in student harassment cases. It also shows how much activity has been delivered over the last five-to-eight years, as institutions continue to make progress.

Using 2016 as the baseline, more than three quarters of institutions have implemented:

- risk management frameworks (85%).
- data handling processes to give the reporting student information about the outcome of misconduct cases (85%). Around half of institutions (53%) have implemented these measures over the last five years. Universities UK's guidance on sharing personal data in cases of student misconduct was published in May 2022.
- trauma-informed processes (79%). There has been a strong move towards this since 2019, with almost three-quarters of institutions (74%) adopting trauma-informed processes over the last five years.
- policies of preventative suspension (79%).

GOOD PRACTICE
Trauma informed processes

Since 2019 the **University of Aberdeen** has drastically increased its focus on trauma-informed practice for victim/survivors of GBV and those who have experienced other forms of harassment or hate. A key element of this has been with regard to student-on-student harassment, and the update to its processes and formal policy on Student Conduct. Reworked in August 2024, the new code addresses issues from previous discipline processes, including the use of investigators who were not aware of trauma-informed practice. The university aims to speed up investigation processes with a team of dedicated support advisors who have had specialist training on issues such as GBV, hate crime, antisemitism awareness, neurodiversity and disability, and LGBTQ issues.

Mandatory training for students

In 2020/21 the **University of St Andrews** introduced compulsory Training in Consent and Bystander Intervention (TCBI) for all students as part of matriculation, including returning students. This module remains a mandatory part of the matriculation process, and must now be completed by all entrant students and any visiting or returning students who have not previously completed the module. Students are able to request an exemption via Student Services if they think the content will impact their mental health and/or wellbeing as a result of a previous experience of GBV (directly or indirectly).

Fig 8
Measures introduced to handle reports of student misconduct (%)
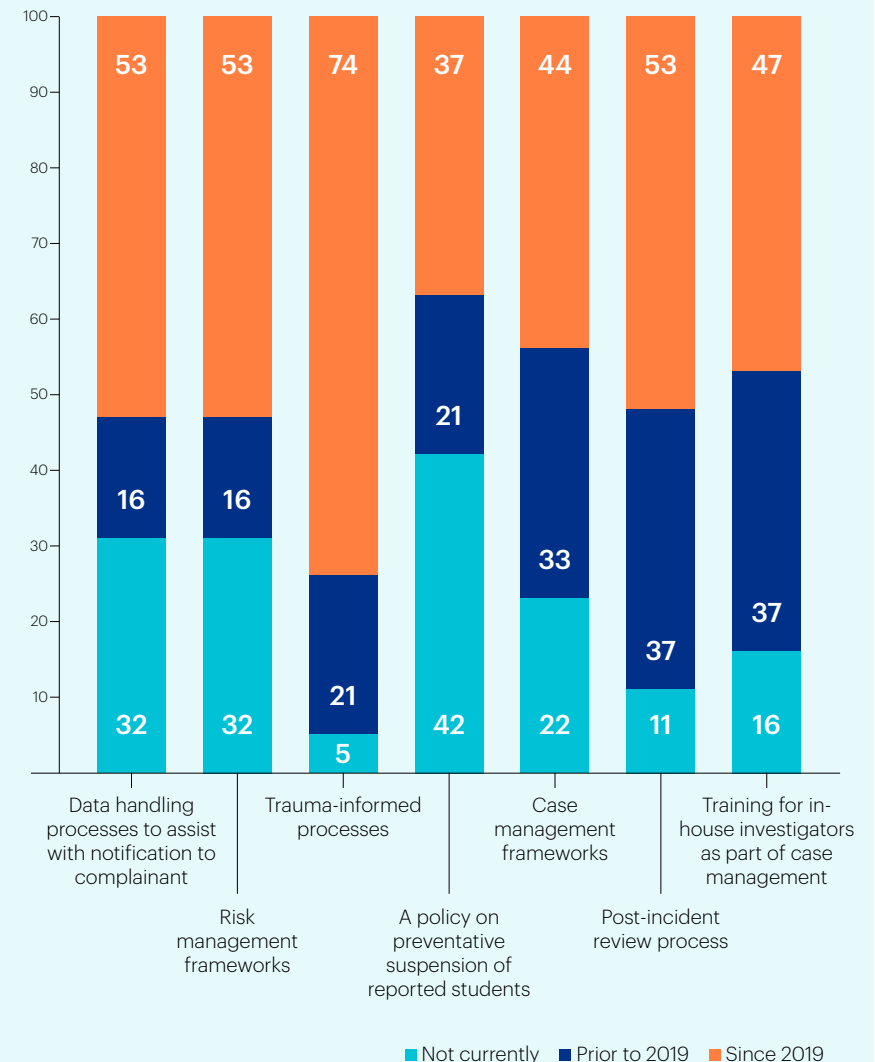
Institutions have invested significantly in the investigations stage of misconduct cases, with 63% running training for in-house investigators since 2019. Of those, most have delivered this within the past five years.

Institutions were also asked if they had ever made use of external, independent investigators as part of the management of student misconduct cases. 10% of institutions indicated they have done so since 2019, and this is a current area of collaborative exploration for institutions. As the college and university sector's joint centre for procurement expertise, APUC (Advanced Procurement for Universities and Colleges) is working to scope and develop a shared service for investigations (see good practice example).

GOOD PRACTICE

Tertiary Education Conduct Investigation Shared Service (TECISS)

A number of universities have been working with APUC to explore options for making available a sector-specific service to supply external, professional investigation services where they consider the need for additional or specific case management support in student misconduct cases. A pool of professional investigators would be available to institutions, where it is appropriate to situate the investigator outside of a university's staff team, for all or part of the investigative process, whilst working to the institution conduct regulations and procedures.

The organisation could also coordinate a confidential peer review of the outcomes of an investigation, to ensure greater independence from any potential conflict of interest within a university context. The shared service could help to address what is currently a significant burden and emotional pressure on university staff, most of whom are not employed for that purpose and should achieve efficiencies of scale. The service is expected to be available for use from 2025.
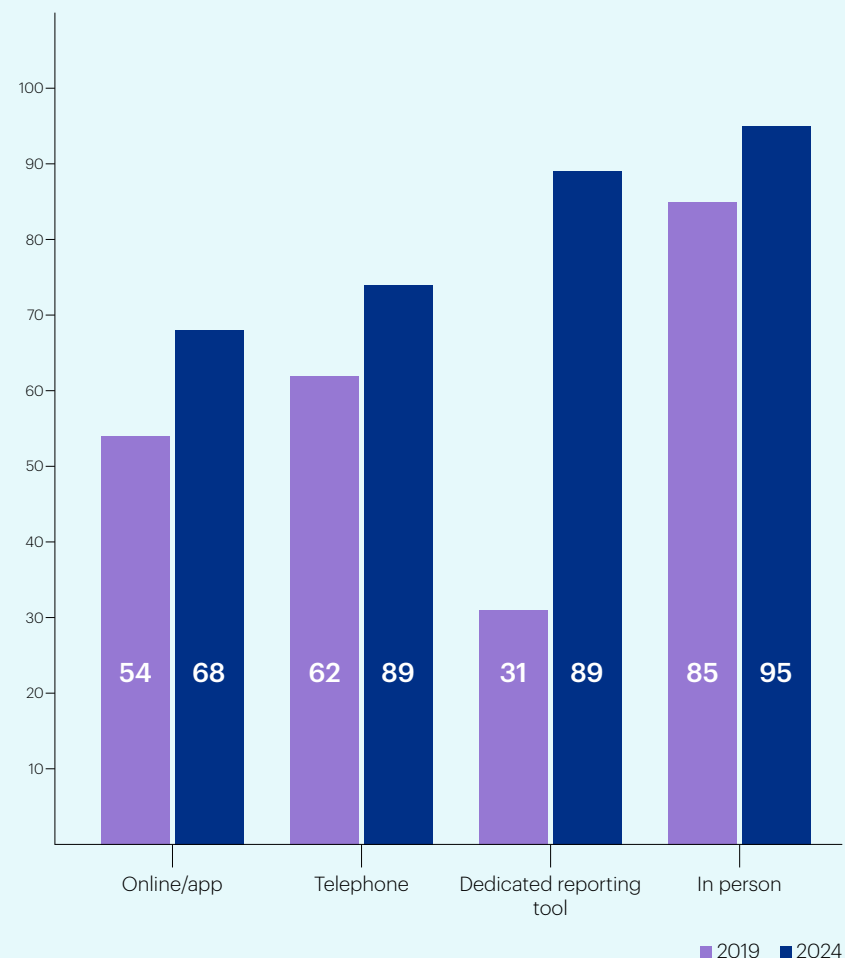
Reporting misconduct

In 2019, at the two-year evaluation, institutions had made reporting mechanisms an early priority of their work in response to all forms of harassment. More than three quarters had spent time improving the visibility and clarity of information on how to report, more than two-thirds were developing or improving their mechanisms for reporting and more than two-thirds were investing time and resource into staff training.

Since then, the biggest development is the extent to which HEI have moved to implement dedicated reporting tools for students, with 89% now having this in place compared to less than one-third in 2019. What is clear from institutions' responses in 2024 is that the same consistent channels for reporting are in use for all forms of harassment: gender-based violence between students, gender-based violence as experienced by students from HE staff and, all forms of hate incidents (race, faith, gender, sexual orientation, disability).

Fig 9
Channels available to students to report all forms of harassment/misconduct (%)

	Online/app	Telephone	Dedicated reporting tool	In person
2019	54	62	31	85
2024	68	89	89	95

■ 2019   ■ 2024

Changing the Culture 2016 recommended that institutions should move towards one single, centralised data collection point for reports of student misconduct. This remains an ongoing objective for many Scottish institutions. In 2019 only 23% of institutions collated data centrally but a further 30% indicated this was an area of active development. In 2024, 58% of HEIs indicate they now have centralised data collation, which suggests that those who were on a path towards this did, indeed, deliver it. Of the remaining 42% of institutions, the majority gave qualitative responses that suggest that this is work in progress, as shown in Fig 10.

It is important to note, as the 2019 report did, that having a mechanism through which to report misconduct is only part of the picture. It is a bigger challenge, but one to which every institution is committed, to deliver a culture in which a student (or staff member) makes a disclosure of harassment with confidence that they will be believed and similarly, makes a report with confidence that it will be acted upon with professionalism and integrity. This circles back to the holistic approach, centred around culture, as initially rolled out by UUK in 2016, and is picked up by institutional responses to a question on continued priorities (see Fig 11).

Fig 10

Qualitative responses from the 42% of institutions actively working toward centralised collection of reporting data

All centrally reported incidents via Report & Support are collated. We are working to do the same via Conduct. In the medium term we aim to extend this to Residences, Security and Academic areas so there is one central repository.

Currently collated in student support and in Human Resources however, plans are in place to discuss centralisation of data.

We are in the final stages of creating an online disclosure tool which will provide data reports on incidents.

Data is gathered via Report & Support and separately via direct reporting of complaints - we are considering routing all complaints via Report & Support in future to centralise this.

The new Safeguarding Committee has established a data sub-group to centrally collate and report all data.
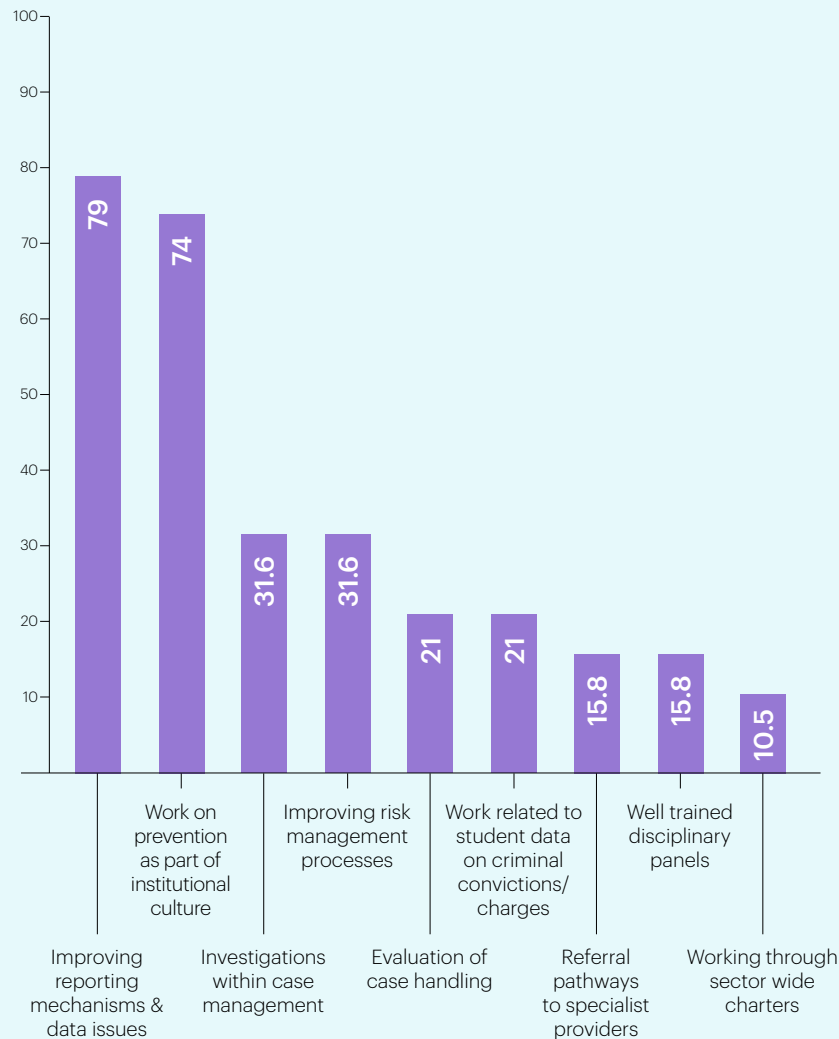
Looking to the future

When asked about priorities over the next three years, two stand out, relative to all others:

- 79% institutions will focus on continued improvement of reporting mechanisms and data issues.
- 74% of institutions said that prevention work as part of institutional culture remained a top priority.

Universities' community of students is a highly transient population, changing year-to-year. Whilst much has been achieved and there is undoubtedly still progress to be made in regard to the culture in institutions, as a microcosm of wider society, in some respects universities' work to create and sustain the right culture will always be continuous.

Fig 11
Three highest priorities identified by HEIs for the next three years (%)

| Category	Value
Improving reporting mechanisms & data issues	79
Work on prevention as part of institutional culture	74
Investigations within case management	31.6
Improving risk management processes	31.6
Evaluation of case handling	21
Work related to student data on criminal convictions/charges	21
Referral pathways to specialist providers	15.8
Well trained disciplinary panels	15.8
Working through sector wide charters	10.5

Over the next three years, close to a third of institutions expect to prioritise risk management processes and the investigation stages of case management. Just over one fifth expect to prioritise student data relating to criminal convictions and charges, which relates to the implementation of guidance as expected from Universities Scotland by late 2024.

Supporting student mental health

A student's experience of harassment commonly intersects with their mental health. The wider mental health services offered by their university, the NHS and other providers, depending on the need, is crucial. In cases of student misconduct, universities' provision of wellbeing support services to both the reporting and reported student(s) runs in parallel to, but with clear dividing lines, from the investigation and management of the potential misconduct. Where clinical attention is required to address a student's physical needs (such as the Sexual Assault Response Coordination Service) and/or mental wellbeing, including acute psychological support, it is crucial that there are effective referral pathways into the NHS.

Both the sector, and Scottish Government are acutely aware of existing gaps in referral pathways and waiting times into the NHS, depending on region. There is a need to strengthen these and achieve greater consistency for students across the country, an element that has been well recognised in the Scottish Government's forthcoming *Student Mental Health Action Plan*, published in September 2024.
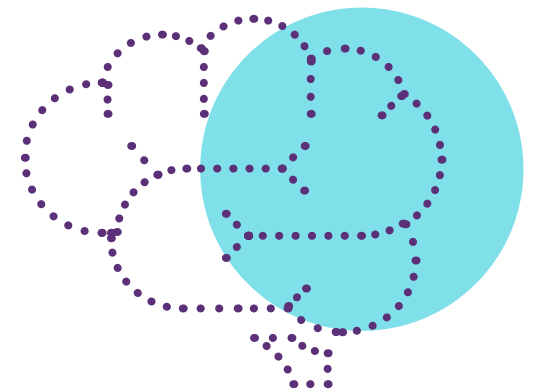
Challenges

When asked what the biggest challenges to further progress are, two answers stood out above the rest. The complexity of challenges facing institutions is a challenge shared by all, with a 100% response rate.
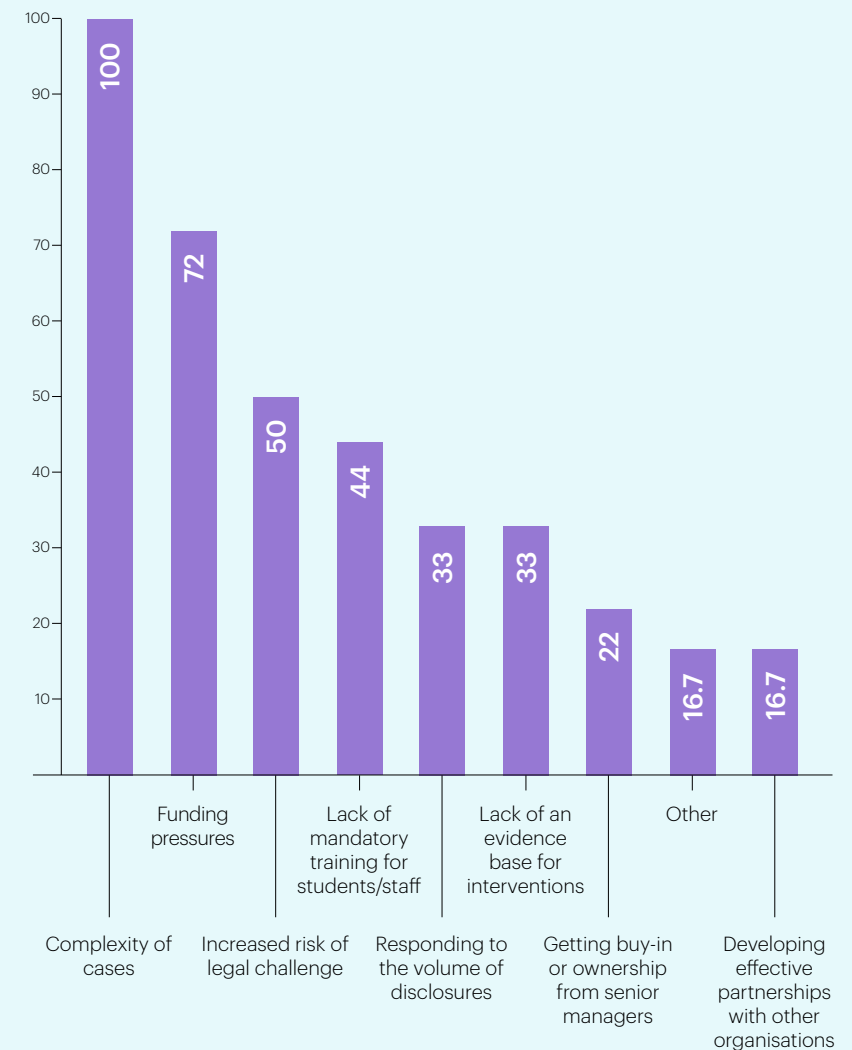
Pressures on resourcing was a strong theme. 72% of institutions highlighted funding pressures as one of their biggest challenges but this also surfaced through other answers, with the volume of disclosures mentioned by a third of institutions and just over one fifth mentioning challenges in getting ownership from senior managers.

The risk of litigation as a result of the process and/or outcome of student misconduct cases was also cited by half of institutions (with the consequence that this also diverts institutions' finite time and resources).

Fig 12
Biggest challenges to further progress on this agenda (%)

Category	%
Complexity of cases	100
Funding pressures	72
Increased risk of legal challenge	50
Lack of mandatory training for students/staff	44
Responding to the volume of disclosures	33
Lack of an evidence base for interventions	33
Getting buy-in or ownership from senior managers	22
Other	16.7
Developing effective partnerships with other organisations	16.7

Reflections

This report clearly demonstrates the higher education sector's commitment to the anti-harassment agenda in support of student safety and wellbeing.

In the spirit of self-reflection and sharing of good practice, we offer a few reflections for areas of activity which would benefit from discussion and knowledge exchange in any one of the existing, peer-to-peer sector networks, including AMOSSHE Scotland, the US Secretaries Group and UHRS. It is one of the great benefits of a small and highly collegiate and collaborative higher education sector in Scotland, and an approach which characterises much of the sector's way of working.

They include:

- **Trauma-informed policy and practice and approaches informed by lived experience.** There is an opportunity for the small minority (21%) of institutions which are not yet confident they are working in this way to learn from the majority of institutions (74%) which already have those processes in place.

- **Single point of data collation of student reports.** This was a recommendation from *Changing the Culture* in 2016. Institutions have responded (58%) and for those not there yet, there is a clear direction of travel but with obstacles (possibly structural, digital, contractual or resource-based) still to overcome. Universities Scotland will work with institutions to share their experiences of moving to a single, centralised reporting and monitoring process, in support of others.

- **Evaluation**.
  There are a few areas where it would be helpful for institutions to share the evaluation of their approaches within existing professional networks, particularly where they are in a minority taking a new approach. Areas identified within this report would include:
  - evaluation on the experience of making some anti-harassment training mandatory for students (such as consent or bystander training) as is the case in 27% of institutions.
  - evaluation of the effectiveness of communications to students on acceptable behaviours before and during enrolment/orientation with regard to the visibility and retention of those messages.

- **Engagement with schools**.
  A majority of institutions (58% – Fig 7) advise they have engaged closely with schools on anti-harassment agendas over the last five years and both EmilyTest and Rape Crisis Scotland deliver training in schools which is focused on GBV prevention and addresses myths and problematic attitudes. However, there could be value in closer collaboration between school, college and university messages on acceptable behaviours, if supported by the Scottish Government's Equally Safe approach. By the point students reach university, their attitudes, behaviours and prejudices have already been shaped significantly by what they have already experienced. Universities do not have the resources to do the preventative work in schools but there could be greater coordination on messaging (on an age appropriate basis).

- **NHS referral pathways**.
  As noted throughout the report, the sector works in partnership with a great range of third sector and specialist organisations. This enables HEIs to draw on the expertise and capacity that exists outside higher education and is also vital to HEIs and those students and staff with wellbeing needs who require specialist support that clearly falls outside the capabilities and responsibilities of universities. NHS referral pathways and waiting times, as part of the matrix in the wider support system, are where the biggest gaps exist and where Scottish Government help is needed to strengthen these both in terms of their governance and accountability.

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