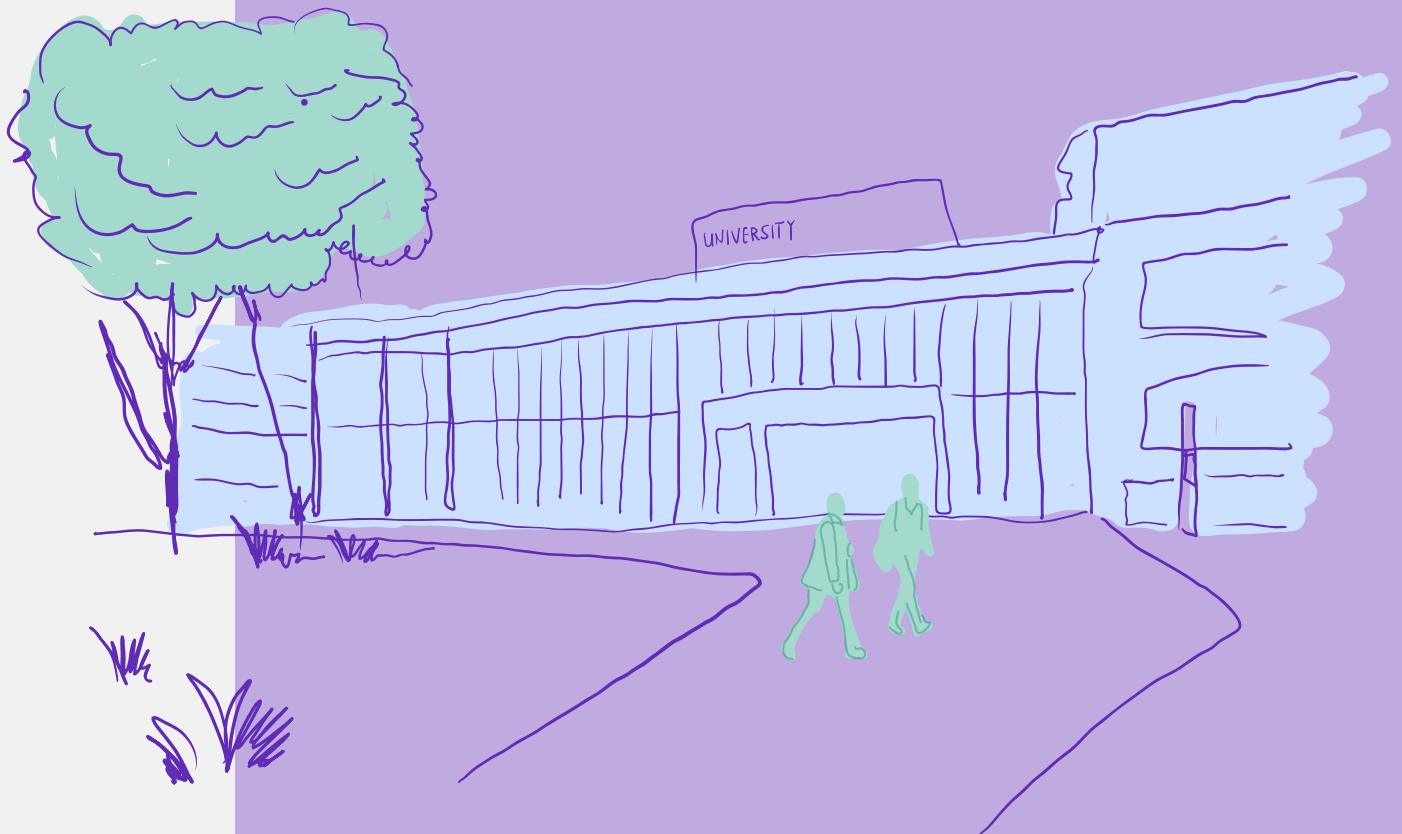


Changing the culture: tackling staff-to-student sexual misconduct

Strategic guide for universities



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Foreword by Professor Cara Aitchison

This guidance calls for collective and urgent action by university leaders and governing bodies to acknowledge and address staff-to-student sexual misconduct within individual institutions and across wider higher education.

Our university sector is renowned for pushing the frontiers of scientific discovery, widening opportunities through education, and embracing the principles and values of equality, diversity and inclusion. It's vital that the unequal power relations that are a prerequisite for sexual harassment and abuse in wider society are challenged by, rather than reflected in, the organisational culture of our universities. We have a legal and moral responsibility to ensure the safety and wellbeing of all students and staff.

Ending violence against women and girls is one of the UN Sustainable Development Goals and we, as university leaders, are responsible for ensuring that future generations do not experience the gender-based harassment, abuse and violence that our generation has endured.

To ensure that our universities are places in which all students can thrive, and not simply survive, we must change the culture to prevent staff-to-student sexual misconduct from happening and make it easier to report and act when it does occur.

It's only by taking action that we can create a culture of trust, where our students have the confidence to come forward, knowing that they will be listened to and receive an effective response. By doing this, our university sector can set the agenda, frame the debate and lead the cultural change needed in wider society.

This guidance is the outcome of collaborative work by the Universities UK (UUK) advisory group on addressing staff-to-student sexual misconduct, and is informed by extensive legal advice. The group was made up of a wide range of sector bodies, a range of policy experts and representatives of survivor-abuse groups, The 1752 Group and Rape Crisis England and Wales. In developing the guidance, the advisory group identified four main thematic areas where action is needed. I would like to pay particular tribute to Margaret Ayers, Anna Bull, Nicola Bradfield and Claire Slater who led the work to develop these areas.

As a sector, we are of course also hugely indebted to those who have shared their experiences and advice and who have lobbied and undertaken activism to bring about change. Speaking out is not easy, takes incredible courage and involves emotional labour. Rather than relying on victim-survivors to do this, we all have a duty to work together to create change.

The guidance takes an approach that is principles based and values driven. Acknowledging that universities are autonomous institutions and each will approach this guidance individually, the guidance sets out a series of recommendations to support leaders in preventing and addressing staff-to-student sexual misconduct by:

- changing the organisational culture
- revising policies and procedures to align staff and student complaints and investigations
- developing practices that better support students
- collecting, analysing and storing data to enable patterns of complaints to be identified and addressed

Our universities have been too slow to address this issue which affects every institution. We must now be seen to make rapid progress to right this wrong. Preventing and addressing staff-to-student sexual misconduct is, fundamentally, about doing the right thing. We also need to act to comply with a legal duty of care, and to safeguard the reputation and position of our universities.

We must lead the way in influencing, rather than simply responding to, the need for wider change across education, the world of work and wider society. Education offers a unique opportunity to change the culture and we must seize this moment to deliver this change.

Professor Cara Aitchison is Chair of Universities UK's advisory group on addressing staff-to-student sexual misconduct, and is President and Vice-Chancellor of Cardiff Metropolitan University.

Introduction

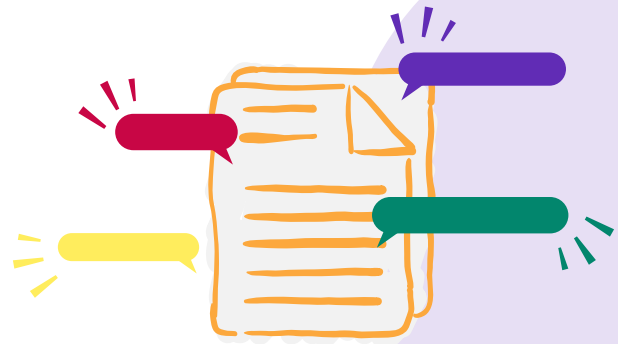
A safe, supportive, and inclusive working and learning environment in every university is essential to ensuring that people studying and working at universities achieve their full potential.

Recognising growing concerns about the incidence of staff-to-student sexual misconduct in higher education, this guidance aims to **change the culture of higher education** to one that prevents sexual misconduct from occurring and ensures high standards of behaviour and safety for **all** members of the university community.

How was this guidance produced?

The guidance was developed by an advisory group chaired by Professor Cara Aitchison, Vice-Chancellor of Cardiff Metropolitan University.

The group included representatives from the [National Union of Students \(NUS\)](#), [GuildHE](#), professional and research bodies in the higher education sector (including [AMOSSHE](#), [ARC](#), [UCEA](#), [UHR](#) and [UKRI](#)),¹ the [University and College Union \(UCU\)](#), [The 1752 Group](#), [Rape Crisis England and Wales](#), academics and expert policy advisers, and practitioners from across the sector in the field of gender-based violence.



¹ AMOSSHE: formerly the Association of Managers of Student Services in Higher Education, now AMOSSHE, The Student Services Organisation; ARC: Academic Registrars' Council; UCEA: Universities and Colleges Employers Association; UHR: Universities Human Resources; UKRI: UK Research and Innovation.

The guidance is based on **five foundational principles** that should inform a university's approach to tackling staff-to-student sexual misconduct:

1. Universities have a legal and ethical responsibility for the safety and wellbeing of all students and staff.
2. Universities are diverse and autonomous, and need to use their own approaches in carrying out this guidance.
3. Addressing staff-to-student sexual misconduct should be part of a broader programme of work designed to tackle all forms of harassment and institutional inequalities. This principle recognises that universities need to establish an organisational culture that supports and promotes equality, diversity and inclusion and which is unequivocal that harassment and abuse will not be tolerated.
4. Tackling staff-to-student sexual misconduct is complicated and challenging. To do so requires change at individual, organisational, community, and societal levels.
5. Collective responsibility and a whole university response within the university community is needed to tackle this problem.

This guidance also builds on our earlier **strategic framework**, [Changing the culture](#) (2016), which focused on tackling harassment occurring between students. This guidance reflects the additional considerations needed to address staff-to-student sexual misconduct. For example, it looks at the unequal power relationships between staff and students and how staff and student policies and procedures must work together.

Collective responsibility and a whole institution response within the university community is needed to tackle this problem.

How universities should use this guidance

This guidance is designed to **support vice-chancellors and governing bodies to deliver a strategic response** to this issue in order to create a shift in institutional culture. It provides a summary of the problem and our high-level recommendations.

It's up to universities to decide how best to use this guidance to implement change, while paying due regard to the principles of the guidance and their wider legal and regulatory duties.

Practical guidance

Given universities are at different stages in addressing staff-to-student sexual misconduct and effective practice in this area is both limited and evolving, we will soon publish a practical guide with suggested actions to support universities in developing their own practical responses.

The guide will support staff to work together across a range of professional services, including:

- student complaints and discipline and conduct policies (registry or student services)
- people services and human resources
- student support
- students' unions
- trade unions
- specialist external organisations
- victim-survivors

We also encourage universities to consider consulting any teaching, learning or other services that are provided by collaborative partners, for example, student placements (national and international) and alumni offices.

This guidance will also support English universities to implement the Office for Student's (OfS) [statement of expectations](#) (2021) for preventing and addressing harassment and sexual misconduct affecting students in higher education.

Universities in Northern Ireland will also find it useful in implementing the Department for the Economy's statement of expectations for preventing and addressing harassment and sexual misconduct.



Legal framework for universities

Universities have legal and ethical responsibilities for the safety and wellbeing of all students and staff. Policies and procedures to prevent or respond to staff-to-student sexual misconduct should acknowledge that a university will take reasonable steps to protect students from harm and support them to continue their education. At the same time, staff should be treated fairly, without the presumption of wrongdoing, and in accordance with their legal entitlements, including those under employment law.

Understanding the legal context of this issue is critical. An accompanying legal framework briefing, developed by Eversheds Sutherland, will be published in April.

It will summarise:

- the legal obligations owed by universities to both students and staff
- the interaction between staff and student procedures
- key considerations for staff and student relationship policies
- the interaction between a university's internal policies and procedures and criminal law

This guidance should be considered alongside the legal framework briefing.

Defining staff-to-student sexual misconduct

Definitions are important and provide a foundation for this guidance. A shared and widely understood definition is critical if the guidance is to change the culture across the sector.

Although there are many definitions and ways to describe sexual misconduct, in summary, we define staff-to-student sexual misconduct as:

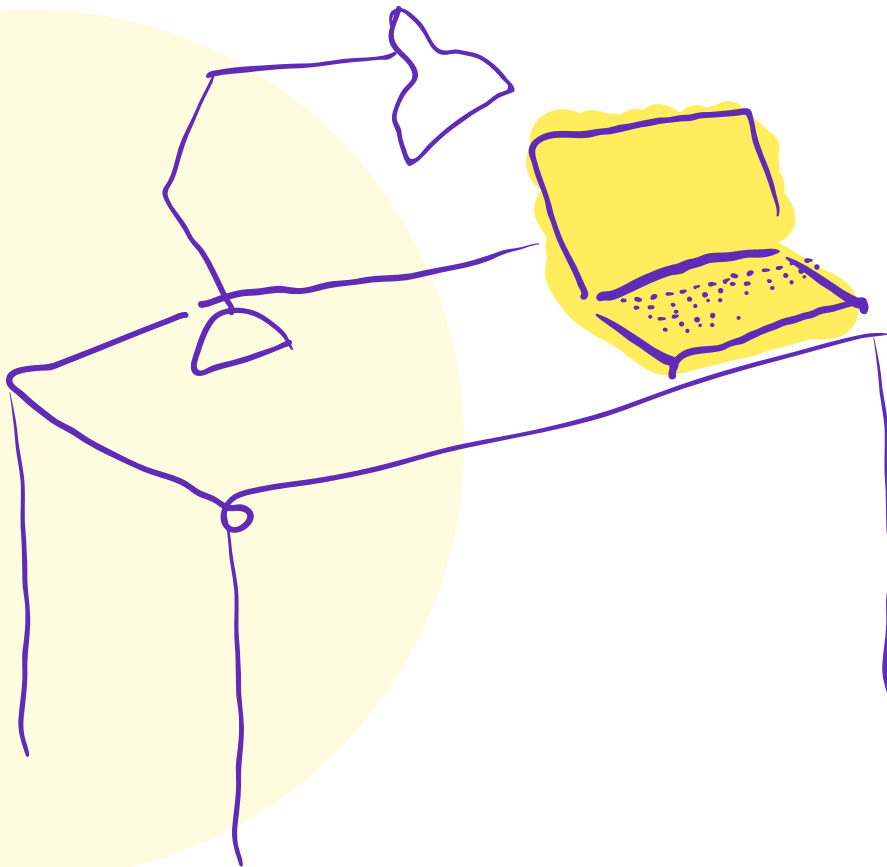
All behaviour of a physically or emotionally intimate or sexual nature by a staff member that, reasonably considered, is inappropriate and/or unacceptable. This includes unwanted behaviour of a sexual nature that:

1. has the purpose, or may reasonably be considered to have the effect, of violating a student's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment for a student; or
2. is an abuse of power over a student; or
3. is more or less favourable treatment of a student because the student has rejected or submitted to such behaviour – through any medium, including online.

Even if the behaviour is not expressly unwanted, this would still be regarded as sexual misconduct if points 2 or 3 apply.

The definition above is based on the definition of harassment set out in Section 26 of the Equality Act 2010.² However, our definition goes further to recognise the importance of the context in which this form of harassment takes place and the presence of imbalances of power, which are often gendered.³

This guidance refers to the term sexual misconduct, as this is a broad term that covers a range of behaviours, including sexual violence, harassment or abuse, coercion, comments, and non verbal communication. The use of the term 'misconduct' is not intended to trivialise what has happened, but to highlight the difference between a police investigation under criminal law and an investigation by the university under its misconduct regulations. This guidance also recognises that the UK Government, devolved national governments and universities themselves use different terminology.



2 For example, see paragraph 2.20 in Equality and Human Rights Commission (EHRC) (2020) [Sexual harassment and harassment at work: technical guidance](#).

3 Imbalances of power are often gendered, but other inequalities and forms of discrimination such as racism, class-based discrimination, homophobia and transphobia can also create vulnerability to sexual misconduct.

Nature and scale of staff-to-student sexual misconduct

There is limited evidence on staff-to-student sexual misconduct, and there are few large-scale studies of this form of misconduct in the UK higher education sector.

However, evidence from studies [by the NUS⁴](#) and [The 1752 Group and the University of Portsmouth,⁵](#) together with periodic Freedom of Information requests made by the media, is concerning both in the number of cases of staff-to-student sexual misconduct and the response from universities.

Removing barriers to reporting is critical in addressing staff-to-student sexual misconduct.

Key findings show that:

- **People of both sexes and all genders can experience staff-to-student misconduct. However, the vast majority of reports are raised by women about men.** As people of all genders are impacted by this form of abuse, approaches to eliminating sexual misconduct should work for all.
- **This form of misconduct is part of the wider culture of gender inequality.** However, gender inequality is not the only factor in this form of harassment, since social and structural inequalities of race, ethnicity, disability, sexuality, socio-economic status and age (or any intersection of these characteristics) can also be subject to abuse that occurs due to an imbalance of power.
- **Students often do not report staff-to-student sexual misconduct when they experience it, and there are low levels of reporting across all student groups.** There are several reasons for this. Removing barriers to reporting (including direct discouragement to report) is therefore critical in addressing this form of misconduct.

4 NUS (2018) [Power in the Academy: staff sexual misconduct in UK higher education.](#)

5 Bull, A. and Rye, R. (2018) [Silencing students: institutional responses to staff sexual misconduct in UK higher education.](#)

- **Sexual misconduct is complex.** It happens because of power imbalances in society that are reflected in rather than challenged by the organisational culture of many universities and large organisations.
- **Unequal power relationships between staff and students,** and a lack of understanding of active consent (including sexual consent) in relationships of unequal power, cause challenges. This power differential can be even greater for students from marginalised groups.
- **Not all staff and students are aware of or understand what is and is not acceptable behaviour between staff and students.** This is particularly important within the diverse inter-cultural context within which universities operate.
- **Subject and level of study are also risk factors,** with postgraduate students more likely to experience sexual misconduct from staff than undergraduate students.
- **Staff-to-student sexual misconduct can lead to students dropping out, or impact detrimentally on their learning experience.** It also affects students and staff beyond those directly involved. This reinforces the need to address the safeguarding risk to others, as well as protecting and supporting those who disclose.
- **Perpetrators can move between universities** and there might be problems with the same person in multiple universities.
- **Information-sharing protocols are not often in place,** and further guidance is required for universities on when to share data in misconduct cases.
- **Institutional responses to student complaints, investigations and disciplinary processes need to be robust, subject to strong institutional governance and reflect sector best practice.** In particular, there are concerns about investigations and outcomes of allegations taking too long to reach conclusions.
- Although this is a complex problem, **universities can put a range of mechanisms in place to address it.**

Students often do not report staff-to-student sexual misconduct when they experience it.

Not all staff and students are aware of or understand what is and is not acceptable behaviour between staff and students.

Recommendations

The advisory group identified four main thematic areas where action is needed.

Although each theme is considered separately, they are connected. An effective response needs a **joined-up approach** with **action across all themes**:

1. **Culture** that addresses sexual misconduct.
2. **Policy** and procedure that is fit it for purpose.
3. **Practice** that delivers change.
4. **Data** that informs changes to culture, policy and practice.

Theme 1: Culture

Culture is about people and structures. It's about the way people behave and respond to each other, to events, and to the environment. Put simply, culture is 'the way we do things around here'.⁶

Having a culture that actively opposes staff-to-student sexual misconduct and supports good relationships between people must be led from the top. It requires the creation of safe and open cultures, where inclusion and diversity are encouraged; dignity and respect are practised; and sexual misconduct, including any behaviour of a physically or emotionally intimate or sexual nature by a staff member, is not tolerated or excused.

Having a culture that actively opposes staff-to-student sexual misconduct and supports good relationships between people must be led from the top.

⁶ Deal T. E. and Kennedy A. A. (1982) Corporate cultures: the rites and rituals of corporate life.

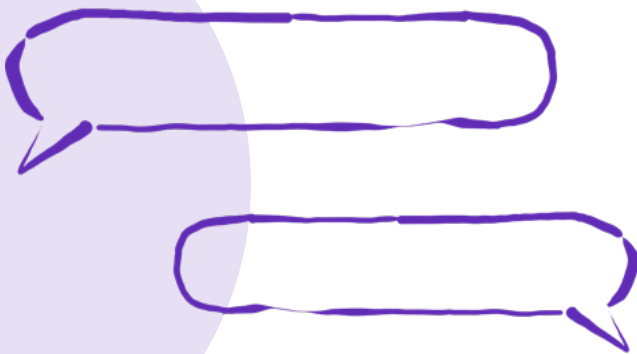
Why it's important

As evidence from [Silencing students](#)⁷ and [Power in the academy](#)⁸ has shown, university environments can be conducive to harassment. More specifically, they can enable staff-to-student sexual misconduct to take place and power imbalances between staff and students can cause unique challenges.

Establishing clear professional boundaries and conduct requirements, along with challenging underlying beliefs and behaviours that undermine gender equality, will actively support culture change.

Recommendation 1: Culture

Define and embed an inclusive and positive culture to ensure an environment that prevents and does not enable or condone staff-to-student sexual misconduct. Institutions, working with all members of the university community, including collaborative providers, can shape expectations and influence behaviours of those in the community to deliver a safe, positive and inclusive environment.



7 NUS (2018) [Power in the Academy: staff sexual misconduct in UK higher education](#).

8 Bull, A. and Rye, R. (2018) [Silencing students: institutional responses to staff sexual misconduct in UK higher education](#).

Theme 2: Policies and procedures

Policies and procedures set out the rules and guidance on, and processes for, what **should** happen within an organisation. They are an important way of establishing culture and behaviours that are in line with a university's values and mission, and with the desired outcomes within the wider sector and society.

Why it's important

A key issue in addressing staff-to-student sexual misconduct is the **low level of reporting** which is partly, although not exclusively, due to unclear policies and procedures. Although analysis of policies relating to staff and student relationships is limited, concerns include:

- a lack of transparency and information about how appropriate staff behaviour is defined and the procedures that flow from the policies
- limited provision for alumni complaints against current staff members
- limited acknowledgement of the problems with sexual consent in a relationship of uneven power⁹

Clear and transparent policies and procedures matter because they make sure everyone understands their responsibilities and professional boundaries. This is important if staff, students and others are to understand what is required of them, the processes that may be implemented, and the consequences if these responsibilities and professional boundaries are not observed.

This can also lessen concerns around confidentiality and data protection. Documenting clearly, in advance, to whom and why information relating to any breach, or alleged breach of responsibilities will be disclosed is an important aspect of data protection compliance. Visibility of policies and signposting at appropriate points during the process are also important, to ensure that all stakeholders are fully informed in a timely fashion.

Clear and transparent policies and procedures matter because they make sure everyone understands their responsibilities and professional boundaries.

Our practical guidance will offer suggestions for policies and procedures and provide a template for developing a policy to address staff-to-student sexual misconduct. It will also provide examples of such policies and procedures from universities.

9 Bull, A. and Rye, R. (2018) [Silencing students: institutional responses to staff sexual misconduct in UK higher education.](#)

Recommendation 2: Policies and procedures

Recommendation 2a

Universities should develop a clear and robust university-wide policy that addresses staff-to-student sexual misconduct, supported by procedures such as those dealing with complaints and discipline. How this policy is put into practice will vary across universities and could be addressed within a university's sexual harassment and misconduct policy, a code of conduct for university staff, and/or captured in a separate policy to manage staff student relationships, conflicts of interest, and power imbalances, along with a commitment in student charters or partnership agreements.

Recommendation 2b

While we recognise the autonomy of universities, given the power differentials and professional relationship between staff and students, we recommend that close, personal relationships between staff and students are strongly discouraged by universities. This is especially important where there is a direct professional responsibility.

Where relationships do occur, the staff member should be removed from all responsibilities that may entail a perceived or actual conflict of interest and/or abuse of power. With the staff member's consent, the student should also be advised of the disclosure, of any relevant changes being made and why these are necessary.

Universities should, where appropriate, and in accordance with data protection and human rights legislation, require staff members to declare any close, personal relationships they have with students, for whom they have a direct responsibility. A failure to declare can be treated as a disciplinary matter.

Such policies should be communicated clearly and regularly across the university community. Staff-to-student sexual misconduct, including behaviour that crosses professional boundaries, should also be defined within university social media policies.

Recommendation 2c

Policies and procedures must be regularly reviewed to make sure they are used and followed appropriately and are up to date. This is critical so that students and staff have confidence in their university to act in a way that is fair and transparent. Regularly reviewing policies will also make sure new challenges are identified and addressed.

Theme 3: Practice

As with other forms of sexual misconduct, there is no single solution to preventing and responding to staff-to-student sexual misconduct. Our practical guidance will present a series of strategies and supporting actions for universities to consider.

It's important that there is joined-up thinking across HR and student services.

Given the involvement of both student and staff processes, it's important that there is **joined-up thinking** across HR and student services, so that student and staff policies and practices work together.

Specific consideration is also drawn to:

- **The power relationship** likely to be present in staff-to-student sexual misconduct.
- **Balancing the rights of, and obligations to, both the reporting and responding parties.**
- **Removing barriers to reporting**, including creating visible and accessible centralised channels for disclosures and reports, and where appropriate, anonymous reporting.
- **Ensuring reporting parties are aware that any action by a university to an anonymous report may be limited** due to natural justice, which states that the responding party has the right to know what they are accused of.
- **Providing clear guidance to help manage expectations for both parties**, including:
 - being realistic about the processes involved in responding to reports and complaints
 - being clear on the options that are available, including distinguishing between student complaint policies and procedures, and staff disciplinary policies and procedures
 - distinguishing between a university's internal disciplinary process and a criminal process
 - providing clarity on what can and cannot be confidential (such as where the university may have a duty to share information or a duty to act)
- **Increasing transparency in sharing data on outcomes and sanctions of complaints and disciplinary processes**, where it is necessary and lawful to do so.

- **Ensuring the process for managing complaints, risk assessments, investigations, and disciplinary processes** are fit for purpose and reflect sector best practice.
- **Creating a culture in which being an active bystander and speaking out is supported and encouraged.** This includes channels for whistleblowing and protection for staff who do this, and for safeguarding reporting parties from being victimised or facing retaliation from a staff member and/or their allies.
- **Dedicating resources** to deliver activities.
- **Avoiding the use of non-disclosure agreements (NDAs) or confidentiality clauses in settlement agreements in cases of sexual misconduct and harassment** to prevent reporting parties from speaking out or to restrict what the university might disclose to others. This is important in the context of staff-to-student sexual misconduct, because the use of NDAs has enabled staff to move between universities.

Why it's important

Policies and procedures alone will not prevent incidents or provide an effective response to staff-to-student sexual misconduct. Policies and procedures must be accompanied by strong leadership and **robust practice** to establish how they will be carried out. Having a **university-wide approach** to address staff-to-student sexual misconduct will help ensure consistency in practice and support cultural change. **Prioritising prevention** is key, but should be accompanied by a **robust response strategy**.

Together these strategies will help break down barriers to reporting and build students' confidence in coming forward. Students should feel they will be heard with respect, dignity and compassion and know that the response will be fair and effective.

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Anonymous Report |

Date

To whom it may concern

More about non-disclosure agreements (NDAs)

Non disclosure agreements (NDAs), often known in universities as confidentiality clauses in settlement agreements, are provisions in a contract which seek to prohibit the disclosure of information by a person or a university.

NDAs can be useful in the employment context as part of both employment contracts and settlement agreements, particularly in relation to business intelligence and competitive advantage.



It is, however, both **unethical and unacceptable** to use NDAs in cases of sexual misconduct and harassment. This can silence reporting parties from speaking out about their experience or a university's handling of an incident, and protect responding parties, as the reporting party is prevented from warning others.

We do recognise, in alignment with guidance from the Advisory, Conciliation and Arbitration Service (ACAS) and the Equality and Human Rights Commission (EHRC), that there might be cases where a confidentiality clause is requested by the reporting party because they want closure and privacy. However, where this is the case, universities are encouraged to consider the ethics of such clauses and be satisfied that they are clear (ie not using ambiguity as a deterrent or to widen the clause) and have an appropriate justification for using them (ie be prepared to explain and defend the inclusion to a regulator or in public).

In 2019, universities in Scotland committed not to use NDAs in relation to sexual misconduct or harassment. On 18 January 2022, the Minister for Higher and Further Education, Michelle Donellan MP launched a pledge encouraging all universities in England not to use NDAs in cases of sexual misconduct and harassment. In Wales, the Minister for Education has written to all universities to ask for information on their approach to NDAs.

Recommendation 3: Practice

Recommendation 3a

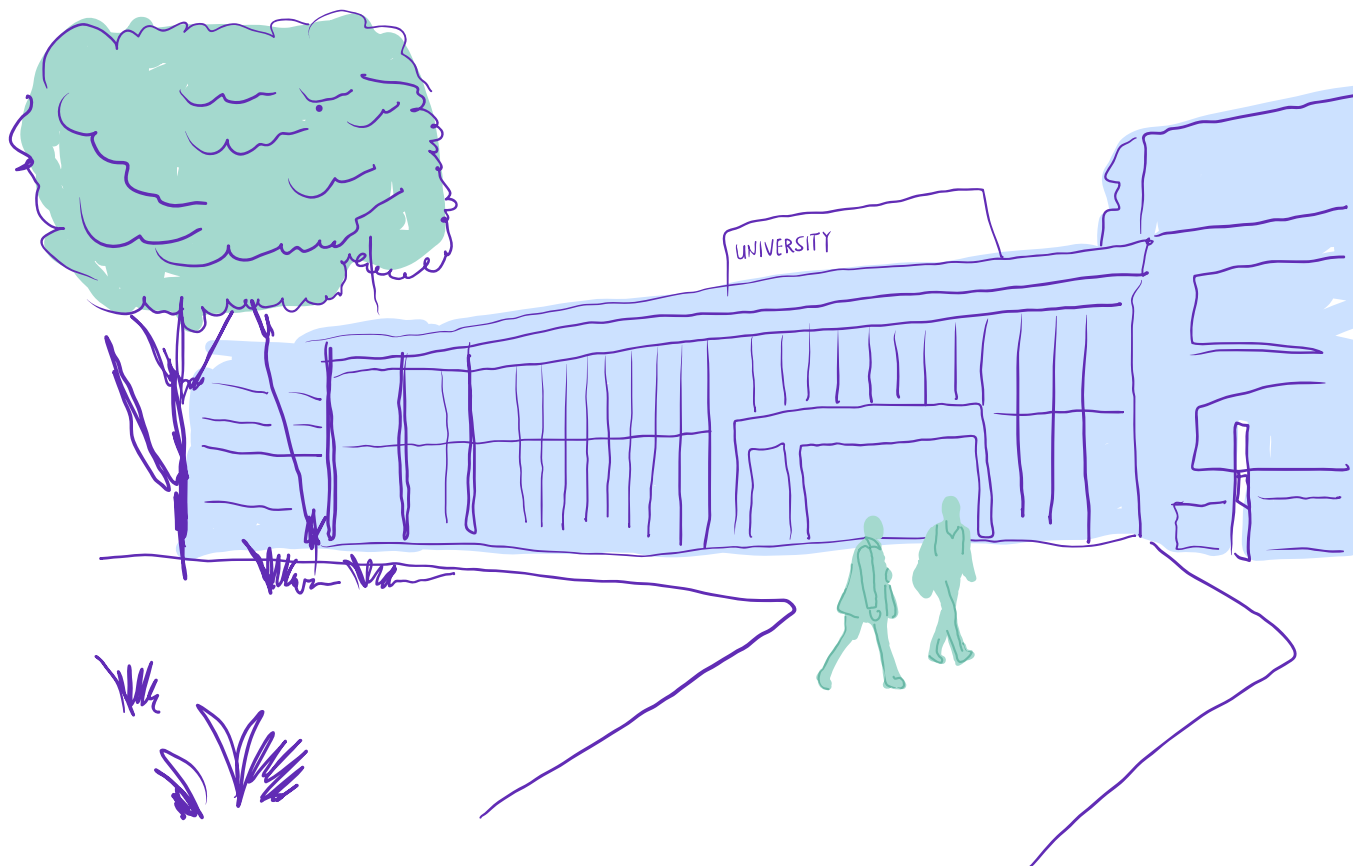
Universities should develop a university-wide strategic response to staff-to-student sexual misconduct. This should include a robust prevention strategy, together with a fair, clear and accessible approach for responding to allegations, disclosures, reports, and complaints. Taking account of victim-survivors' voices and collaborating with students, staff, other universities and external organisations will enhance institutional responses.

Recommendation 3b

Universities should not use non-disclosure-agreements (NDAs) or confidentiality clauses in settlement agreements in cases of sexual misconduct or sexual harassment.

Recommendation 3c

Universities should regularly monitor, evaluate and review practice and share lessons learned across the sector to support a cycle of continuous improvement.



Theme 4: Data

Valid and reliable data are critical to tackling staff-to-student sexual misconduct: data helps us to **see and understand the problem**. Setting out a clear structure for data to be collected can make sure that incidents of harassment are not hidden within other complaints or disciplinary information.

Collecting and keeping personal data and details of incidents, and collecting statistical data to monitor progress in this area, are distinct processes that fall under data protection legislation, and both processes carry compliance obligations.

Creating anonymised information is a processing activity in its own right. Universities should therefore include information about this processing in their relevant data privacy notice.

Why it's important

The gathering and analysis of data on reported incidents are fundamental to **forming baselines, identifying improvement goals that can be measured, and evaluating progress**. Data is also needed to carry out and evaluate measures to increase reporting and to check whether there have been improvements in organisational culture and processes.

Building trust in an institution requires transparency.

There are, however, challenges in gathering, storing and, where appropriate, publishing data in this area. Sexual misconduct is widely regarded to be underreported, especially by people who are marginalised in relation to their protected characteristics.¹⁰ Also, the range of incidents and resolutions is not always visible in current data-recording mechanisms. Difficulties arise in defining categories of misconduct and ensuring that incidents are recognised or defined as sexual misconduct.¹¹

Failing to keep accurate data on recorded incidents of harassment could also affect a university's ability to meet its obligations under the Public Sector Equality Duty to eliminate harassment and foster good relations or a university's ability to discharge its obligations under the General Data Protection Regulation (GDPR).¹²

¹⁰ Equality Act 2010.

¹¹ EHRC (2010), [Sexual harassment and harassment at work](#).

¹² EHRC (2019), [Tackling racial harassment: universities challenged](#).

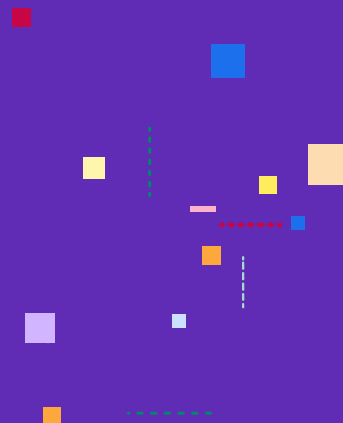
Building trust in an institution requires transparency. One way to do this is to **publish anonymised data** on the number and outcomes of complaints relating to staff-to-student sexual misconduct and, where possible, outcomes and sanctions relating to any disciplinary action taken. This not only demonstrates institutional accountability, but is also an important way of informing students, staff, and governing bodies that this is an area that the university takes seriously. This can also be useful when responding to Freedom of Information and media requests.

Recommendation 4: Data

Universities should adopt a systematic approach to collecting, retaining and reporting data on incidents of staff-to-student sexual misconduct, including:

- a) numbers of actual reports and/or complaints, including those resolved informally and anonymous reports; and
- b) anonymised data on reports and/or complaints, and action taken to respond to emerging trends.

This will support universities to identify systemic problems and to understand both the nature and scale of staff-to-student sexual misconduct and the effectiveness of institutional support, policies and practices in responding to these.



Looking forward

The first step in the journey to tackling any form of harassment or wider misconduct is to acknowledge that the problem exists. This need to acknowledge the current situation was made by the NUS in its [2018 report](#) and is essential in raising awareness of this issue.

Second, an increase in reports of staff-to-student sexual misconduct, at least in the short term, should not be seen as a negative development. It's only through knowing about instances of misconduct that universities can address the issue effectively and provide appropriate support. An increase in reports can also contribute to a change in culture and greater levels of trust among staff and students, both of which are essential.

Studying the prevalence of this type of misconduct will also support universities in fully understanding patterns of increased reporting. High prevalence and low reporting is where some universities may start. They may then transition through to high prevalence and high reporting, and then finally to low prevalence and (proportionately) high reporting. The ratio of prevalence to reporting could eventually be the most appropriate measure of how effectively a university is responding to this problem.



As a sector, we need more evidence on what works to prevent and respond to this type of sexual misconduct. We need to learn from each other, and we need to move towards being transparent about the issues we face if we are to change the culture.

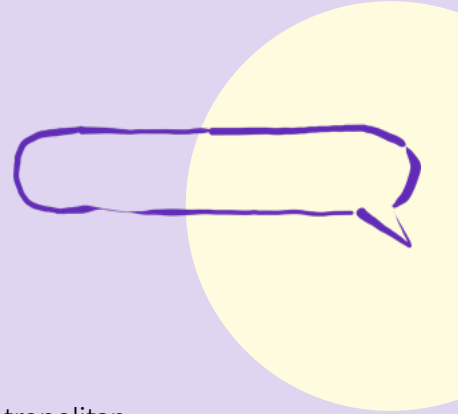
To support this cultural change, we will carry out a light-touch assessment over the coming 12 months to understand how the guidance is being used, and will share successful initiatives and lessons learned across the sector. This evaluation exercise will include engagement with universities, the NUS and those working with victims and survivors, including The 1752 Group. This engagement will provide an opportunity to consider whether further guidance or support is required to address the issue and to ensure that the guidance remains relevant and up to date. In view of this ongoing review, this guidance should be considered a **'live' document**.

We need to learn from each other, and we need to move towards being transparent about the issues we face.

This evaluation will be particularly important in the context of ongoing rapid change due to the Covid-19 pandemic, and the likelihood of more on-campus learning for students this year than has been seen since 2019. It will make sure new challenges arising from hybrid learning and agile working are met, and improvements continue to be made by universities.

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