

ADDRESSING GENDER-BASED VIOLENCE (GBV) AND SEXUAL HARASSMENT POLICY

This document sets out the University policy for Addressing GBV and Sexual Harassment and provides signposting to the support and reporting options available for staff and students who have experienced/are experiencing these issues. We take a whole University approach, and this Policy applies to both staff and students.

Gender-Based Violence (GBV) is any form of violence directed at someone because of their gender. It is a result of deep-rooted gender inequalities and perceived gender roles within society, and can be physical, sexual, and psychological in nature. Examples of GBV include stalking, coercive control, sexual harassment and assault, and physical and verbal abuse.

IF YOU NEED URGENT SUPPORT

- If you or someone else is at immediate risk of harm, call 999.
- See your GP or attend A&E to have any injuries treated.
- Emergency contraception is available at any pharmacy.
- Contact the [Sexual Assault Response Coordination Service](#) for practical support.
- Contact the [Rape Crisis Scotland](#) helpline for emotional support.

Where you can get support

For students: a full list of internal and external sources of support can be found [on our website](#).

For staff: a full list of support resources can be found [on our website](#), via our [Employee Wellbeing page](#), and our [Workplace Dignity Network](#). The [HR team](#) are also available for support.

Reporting Options

If you would like to report an incident of GBV to the University, you can do so using our [Online Reporting Tool](#) or by speaking with a member of the [Student Advice & Support](#) or [HR](#) teams. You can also report it directly to the Police Scotland by calling 999 (emergency), 101 (non-emergency), visiting a local Police Station or using their [Online Reporting Form](#).

1. Policy Statement

- 1.1 The University of Aberdeen, in line with its strategic plan Aberdeen 2040, is committed to creating positive and inclusive working and learning environments. The University will care for the wellbeing, health and safety of our diverse community, supporting and developing our people to achieve their full potential.
- 1.2 The University recognises that GBV is a significant equality issue that covers a range of violent behaviors and wider abuse across society.
- 1.3 The University does not tolerate GBV and seeks to create a culture which fully rejects inappropriate behaviours and attitudes, in line with the Equality, Diversity & Inclusion Policy. The actions of staff or students who perpetrate GBV within the workplace or learning environment (in person or online), are unacceptable. Such actions contradict the University's values, breach the standards of behaviour expected of university staff and students under the Equality, Diversity and Inclusion Policy and can be illegal. The University is committed to preventing incidents as well as providing an effective response if an incident occurs.
- 1.4 The University works with a range of partners in developing its approach to combatting GBV and supporting any individuals who have experienced/are experiencing it. We incorporate research undertaken by the Scottish Government, NHS Scotland, EmilyTest and through the Equally Safe in Colleges and Universities Strategy (Scotland's national strategy on GBV) into our work and this Policy.
- 1.5 This Policy provides guidance for members of staff, managers, students and those who support them on our approach to combatting GBV and supporting victim/survivors in our community.
- 1.6 The University "Addressing Gender-Based Violence and Sexual Harassment Strategy Group" will oversee our work in this important area, which includes representatives from across the University (including staff, students, and Trade Union representatives). The strategy group oversees and is accountable for the development of the University's strategy for addressing GBV that impacts University staff and students. The group continues to review the research and findings highlighted above and supports the Scottish Government's Strategy for preventing and eradicating all forms of GBV.
- 1.7 This Policy has been reviewed in line with the Equality Act 2010, and specifically the October 2024 duty on employers to take reasonable steps to prevent sexual harassment.

2. Principles

- We will ensure that all members of staff and students are aware of our approach to GBV.
- We will ensure that anyone who has experienced GBV is listened to, supported, and treated with dignity and respect.
- We will raise awareness of GBV related issues to try and prevent GBV before it happens.
- We will clearly outline the support available to those who may have experienced GBV both inside and outside of the University as a place of study or work.
- We will clearly outline how to report incidents of GBV and have in-person and online options for making reports.
- We will have clear procedures for dealing with perpetrators of GBV.
- We will ensure that perpetrators of GBV have appropriate outcomes applied

to them following investigation and hearing processes.

3. Scope

3.1 This policy applies to all University staff and students

4. Definitions

4.1 GBV is the umbrella term that the University use for any abuse that is perpetrated against a person's will and that results from power inequalities based on gender roles, norms, identities, and expectations in the private and public spheres*. The University recognises that although GBV is experienced mostly by women and perpetrated mainly by men, anyone can be a victim or perpetrator of GBV, regardless of gender identity. The approach taken by the University specifically recognises that GBV also includes violence against any gender identity or expression, including lesbian, gay, bisexual, transgender and non-binary (LGBTQ+) people. GBV occurs in all sections of society, irrespective of class and culture. It is recognised that GBV intersects with other forms of violence, abuse and harassment based on other aspects of someone's identity. Violence and harassment that is motivated by multiple forms of discrimination, including GBV, can also be reported through the processes outlined below.

4.2 We recognise that definitions of GBV change over time; however, the definition at its core highlights actions that result in physical, sexual and psychological harm of the victim/survivor, and include (but are not limited to):

- Physical, sexual, and psychological violence occurring in the family (including children and young people), within the general community or in institutions, including domestic abuse, rape, and incest.
- Sexual harassment, bullying and intimidation in any public or private space, including work.
- Commercial sexual exploitation, including prostitution, lap dancing, stripping, pornography and trafficking.
- Child sexual abuse, including familial sexual abuse, child sexual exploitation and online abuse.
- 'Honour based' violence, including dowry related violence, female genital mutilation, forced and child marriages, and 'honour' crimes.
- Stalking.
- Coercion and control.

5. Reporting Incidents of GBV at the University

5.1 The University is committed to helping its staff and students report incidents of GBV if that is something they want to do. We can support individuals to make a report to the University and commit to investigating any incidents where the alleged perpetrator is a staff member or student. We will also make external reporting options clear when speaking with someone about GBV, for example, reporting to Police Scotland. Support will be given to individuals regardless of if or how they chose to report, or if the perpetrator is a member of university staff or a student.

5.2 The University recognises that disclosing incidents of GBV is incredibly difficult and that it takes great courage for individuals to come forward. Individuals who have experienced GBV will be listened to, treated with dignity and respect, and will be given the support

that feels right for them - we take a victim/survivor led approach and promote empowerment and individual choice (except in cases where there is significant risk of harm to the individual, or others, in which case we would take the necessary steps to ensure safety and wellbeing).

- 5.3 The University has implemented an Online Reporting Tool for staff and students – this can be found on our [dedicated website](#). The Reporting Tool has two functions – named and anonymous reporting, both of which signpost to a full suite of support (both internal and external).
- 5.4 The online report invites the user to complete a 9-step form; the data will not be stored and collected until all the steps have been completed and the report is submitted. Submitting a report does not automatically start a complaints process. The information disclosed in the reporting tool is accessed by a small number of authorized members of staff, as detailed in our [Privacy Statement](#).
- 5.5 Staff members wishing to submit a grievance should do so through their immediate line manager or through their line manager's manager. Reports can also be made through the other members of staff mentioned in Internal Support Available, outlined below. Complainants shall always be kept informed of the stage their complaint is at.
- 5.6 Students who wish to make a Formal Complaint can do this through the University's [Complaints Handling Procedure](#). Any reports of GBV that are made to the University by a student (either via the Online Reporting Tool, directly to a member of staff, or by any other means) may be considered at an Initial Review by our Conduct Team (if the student consents to this). An Initial Review will determine the most appropriate next steps, one of which may be to progress to an investigation under our [Code of Practice on Student Discipline \(non-academic\)](#) (also known as "The Code"). This document outlines the types of situations in which the University may investigate allegations of non-academic misconduct, and the expectations we have of students in relation to their behaviour. To make the investigation process as clear as possible, we have created a [student guide to The Code](#).
- 5.7 It is also possible to report on behalf of someone else, known as third party reporting. This can be done in instances where an individual has witnessed GBV and wants to report it or where they are asking for information and guidance on behalf of a third party such as a friend or colleague. In such cases, the response to the report will be focused on the support available for those supporting others. We are unable to take any action based on a third-party report, unless possible to do so whilst maintain victim/survivor anonymity and maintain victim/survivor-led approaches.
- 5.8 Reports of GBV can be made at any time, whether an individual's experiences were recent or historical. Our focus is on supporting individuals at the point of need, and at a time when they feel ready to take action.
- 5.9 We recognise that there may be barriers to reporting incidents of GBV and we will actively try to reduce these barriers by increasing the avenues for reporting incidents, raising awareness of procedures, and promoting safe, confidential spaces to talk in. We always welcome feedback and input from our staff and students on our approach and what we could do differently. We incorporate this feedback when reviewing our policies and procedures, updating our Online Reporting Tool, and developing and improving our staff and student facing services.

6. Internal Support Available - Students and Staff

- 6.1 Any member of staff or student who makes a report will be treated with dignity and respect throughout the process. The individual will be listened to by an appropriate adviser; for students this will be a member of Student Support Services and for staff an HR Partner. During the meeting a plan will be put in place and all measures to ensure the immediate safety of the students or staff member will be explored and discussed. It is important to note that support is also available for students working away from campus or on study abroad programmes. In such instances, we will liaise with the students about the support that feels safe and comfortable for them and do what is practically possible to facilitate the delivery of this. A referral to the following may be discussed after a disclosure has been made to Student Support or HR:

STUDENTS:

- Student Advice & Support Team
- Personal Tutor/Regent
- University Counselling Service
- Aberdeen University Students' Union
- Multi-Faith Chaplaincy
- Equality, Diversity and Inclusion Lead

STAFF:

- Line Manager
- Human Resources Business Partner or Adviser
- Campus Trades Unions
- Employee Assistance Programme
- University Counselling Service
- Occupational Health Service
- Multi-Faith Chaplaincy
- Workplace Dignity Network
- Equality, Diversity and Inclusion Adviser

- 6.2 In all cases, staff and students are encouraged to see their GP if they have concerns about their mental or physical wellbeing.
- 6.3 Students and staff may wish to seek support from independent external agencies that specialise in working with victim/survivors of GBV, including specific specialist support for racialised groups, LGBTQ+ and disabled victim/survivors. These agencies can offer practical, emotional, and legal support.

7. Confidentiality

- 7.1 All staff who respond to incidents will aim to do so in a thoughtful and timely manner and all details will be kept confidential in so far as this is practicable. The University may share information with relevant individuals, with permission of the reporting party, in order to provide the appropriate support. In exceptional circumstances, (in line with safeguarding legislation) where there is reason to believe that there is an emergency and/or there may be serious risk to the physical or mental wellbeing of the member of staff, student or others, the University may share information to protect an individual or

stop a crime taking place. In those circumstances, the recipient of the disclosure must confirm to the member of staff or student the steps that will be taken and the way in which the information will be used or further disclosed.

8. Disclosures of GBV by a student or member of staff

- 8.1 Where a disclosure of GBV is made by University staff or students either within or outside of work or the learning environment, the University will take appropriate steps to respond to and deal with this quickly and effectively.
- 8.2 We have committed to training all staff across the University in "[LISTEN](#)", a conversational tool (created by our external partner EmilyTest) that equips staff with the knowledge, skills, and confidence to be able to manage initial disclosures of GBV, ensure staff/student safety, liaise with the appropriate escalation contact(s) and signpost onto the relevant support. We have trained a significant number of staff already and have internal LISTEN trainers who will rollout monthly training sessions going forward.
- 8.3 We will follow the relevant procedures that apply to staff or students and where appropriate we will undertake a risk assessment, seeking input and advice from appropriate sources depending on the nature of the disclosure. These sources will include the individual disclosing the concern and the party who has received the disclosure. We may also consult external agencies like Police Scotland, the NHS, or other relevant individuals, depending on the case. The risk assessment will consider the possibility that the reporting party may be exposed to further abuse from the perpetrator, the risk that they may suffer retaliation as a result of their disclosure, and their own suggestions for managing this risk. It will determine suitable measures to eliminate the risks where possible, or to mitigate them if it is impossible to eliminate them.
- 8.4 The potential risk to others on campus will also be considered. In certain situations, especially where the reported incident includes an allegation of physical violence or of a threat of physical violence, it is possible that the alleged perpetrator will be excluded from campus until the outcome of the investigation. Where this is deemed necessary, it will be as a safety precaution, not as a penalty, and will infer no presumption of guilt. Part of the response to a disclosure will be explaining to the individual how they can take out a complaint. These policies are outlined below.
- 8.5 Any member of staff who receives a disclosure will not be involved with any subsequent investigation following the disclosure and will, where possible, be available to continue to support the individual. In some situations, we may need to arrange for alternative support to be put in place if a staff member becomes unable to provide ongoing support.
- 8.6 Where an individual decides to take out a complaint with allegations of GBV against a member of staff these will be dealt with initially through the Grievance Procedure. As part of this process, any allegations made will be clearly set out with all parties provided with the opportunity to state their case or respond to allegations, having due regard to the ability of the complainant to participate in the process.
- 8.7 Where a complaint with allegations of GBV against students is made it will be dealt with under the Code of Practice on Student Discipline (non-academic).
- 8.8 In any internal investigation the standard of proof that the University will apply is the balance of probabilities. This means that the University must decide whether it is more likely than not that the alleged misconduct took place. This is in contrast to the approach

taken in the criminal justice system, where a higher standard of proof is needed, namely 'beyond reasonable doubt'.

- 8.9 The University will ensure that staff or students who have allegations made against them will be signposted to appropriate support or agencies.
- 8.10 Where the relevant Staff or Student Policy does not apply (including but not limited to agency workers contractors, etc.), the University shall take appropriate steps to ensure that the matter is dealt with appropriately.
- 8.11 Any member of staff could be the recipient of a disclosure of GBV. The University recognises that this can be a difficult situation for both the person who has experienced the incident and for the recipient of the disclosure. Staff are reminded of the resources available to support them that can be [found on our website](#).
- 8.12 Staff who receive a disclosure should discuss the situation confidentially with [Human Resources](#) (in cases involving staff) or [Student Support Services](#) (in cases involving students) to access advice and support on dealing with the situation. Staff may escalate a situation if they believe that the individual making a disclosure or someone else is at immediate risk of harm.

9. Criminal Investigation into Allegations of GBV

- 9.1 Where criminal investigations have been instigated against a member of staff or student alleged to have been involved in an incident of GBV the University may, where appropriate, conduct its own disciplinary investigation into these allegations in parallel to the ongoing criminal investigation. The University may, however, pause the internal investigation, pending the outcome of any criminal investigation.
- 9.2 The University will assist the police as far as possible with safety planning and risk management measures to ensure the protection on campus of a member of staff or student who has experienced GBV. The University will also conduct its own assessment of risk and implement any necessary additional protections for the member of staff or student.

10. Links with University of Aberdeen policies

- 10.1 This policy should be read in conjunction with other University of Aberdeen policies including:
 - [University of Aberdeen and Aberdeen University Students' Association Relationship Agreement](#).
 - [Staff Investigations Procedure](#)
 - [Staff Disciplinary Procedure](#)
 - [Staff Grievance Procedure](#)
 - [Code of Practice on Student Discipline \(Non-Academic\)](#)
 - [Transgender Equality Policy](#)
 - [Ethical Framework on the Boundaries of Confidentiality](#).
 - [Whistleblowing Policy and Procedure](#)
 - [Complaints handling Procedure](#)
 - [Staff/Student Relationships](#)
 - [Staff/Staff Relationships](#)

- [Dignity at Work and Study Toolkit](#)
- [Equality, Diversity, and Inclusion Policy](#)
- [Transgender Equality Policy](#)

11. Policy Review

- 11.1 Many of the policies noted above will be reviewed following the initial approval of this policy and as a result it is likely additional changes will be needed to this policy. As a result, this policy will be reviewed one year after its initial implementation to incorporate these changes and then every two years thereafter, in line with our standard policy review processes. However, feedback on the policy can be passed to the Director, or Deputy Director, of People at any time.