

UHI | INVERNESS

Preventing and Responding to Gender Based Violence (GBV) Policy REF: PL/CS/2024/002

Lead Officer	Vice Principal Student Experience & Quality
Review Officer	Wellbeing & Learning Support Manager Access and Progression Manager
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Reviewer	Date	Change Log
Wellbeing & Learning Support Manager & Access and Progression Manager	Dec 2023	3.5 GBV Disclosure section 3.6 GBV Support & Intervention

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Policy Summary

Overview	The policy highlights UHI Inverness' approach to Gender Based Violence (GBV), including the expectations and responsibilities of staff. This is set within the context of the broader framework of policies and related procedures.
Purpose	The policy seeks to highlight and promote a culture across the institution where GBV is not accepted or facilitated by staff or students. Where a student is subject to GBV (past, present, or potential), the policy seeks to ensure appropriate support is provided and UHI Inverness meets its duty of care.
Scope	This policy aims to serve all enrolled students of UHI Inverness and is not limited to term-time or on-campus activity. We recognise that every member of staff at UHI Inverness has a role to play in preventing GBV. Any incidents related to staff are not within the scope of this policy and will be dealt with using the appropriate HR policies and/or the Safeguarding policy.
Consultation	This policy has been developed by the UHI Inverness GBV Working Group which has membership from across UHI Inverness and HISA Inverness. UHI Inverness has also benefitted from the ongoing GBV work being achieved at partnership level and acknowledges the input of the UHI Student Support Officer for GBV. Input has also been sought from partner agencies of the Highland Violence Against Women Partnership.
Implementation and Monitoring	The Wellbeing and Learning Support Manager and the Access and Progression Manager are responsible for implementing this policy. The Quality Manager is responsible for the ongoing monitoring of this policy.
Risk Implications	This policy will reduce risk for UHI Inverness by ensuring that best practice is being shared and followed to educate, protect, and support students effectively.
Link with Strategy	This policy supports UHI Inverness' commitment to provide a safe and supportive learning and working environment for all, aligned with the Strategic Theme of 'Student Experience'.
Impact Assessment	Equality Impact Assessment: Completed March 2023. No action required.
	Privacy Impact Assessment: n/a

1. Policy Statement

1.1 UHI Inverness recognises the severity of risk and harm that Gender Based Violence (GBV) presents and has a duty of care to protect and respond to students who: have past experiences of GBV; are currently experiencing GBV; and/or are at risk of potential GBV. UHI Inverness affirms its stance that GBV is unacceptable, and victim/survivors are not to blame by raising awareness of GBV to ultimately prevent or reduce harm.

1.2 GBV is not uncommon. Tens of thousands of incidences of domestic abuse¹ and sexual crimes² are recorded annually by Police Scotland, with women aged between 16-24 years experiencing the highest level of domestic abuse⁵. This is significant given the demographic profile of student populations. 1 in 7 female students in the UK experience serious physical or sexual assault, and 68% experienced sexual harassment during their studies³ [statistics correct in 2023]. This policy seeks to ensure that UHI Inverness is familiar with the prevalence and scale of GBV, and that our approaches and responses reflect this.

1.3 UHI Inverness' approach aligns with the themes set out in the Scottish Government's Equally Safe Strategy⁴ and the Equally Safe in Higher Education (ESHE) Toolkit², most notably:

- An ecological framework
- A gendered analysis
- An understanding of intersectionality

1.4 UHI Inverness recognises that its responsibilities in relation to Gender Based Violence are closely linked with its duty to eliminate discrimination and harassment, and advance gender equality in line with the Equality Act 2010. For that reason, this policy should be viewed across all GBV contexts. We commit to demonstrating UHI Inverness' core value of openness in our GBV approach, including by adopting an "It Happens Here" stance and communicating anonymous statistics where appropriate; and by reflecting on and sharing learning from incidents.

2. Definitions

2.1 **Gender Based Violence (GBV):** an umbrella term that reflects forms of violence predominantly carried out by men against women and girls, although men and all/no genders can also be victim/survivors of GBV- which *can* include, but is not limited to, and is not always indicated by; physical, sexual, and psychological violence occurring within the family and/or intimate partner relationships (including domestic abuse and coercive control), sexual harassment, stalking, non-consensual intimate image sharing, drink spiking, rape and sexual assault, commercial sexual exploitation, sex trafficking, child sexual abuse including child sexual exploitation, and so called 'honour based' violence including female genital mutilation (FGM) and forced marriage.

¹ Scottish Government (2021). Domestic abuse: statistics recorded by the Police in Scotland 2020/21. [Available here.](#)

² Scottish Government (2020). Recorded crime in Scotland 2019-20. [Available here.](#)

³ NUS (2011). Hidden Marks. [Available here.](#)

⁴ Scottish Government (2018). [Equally Safe: Scotland's Strategy for preventing and eradicating violence against women and girls.](#)

2.2 **Duty of Care:** Our responsibility to use professional expertise and judgement to protect and promote the best interests of students and staff, and to ensure that we exercise an appropriate level of care towards them, as is reasonable within the parameters of our relationship.

2.3 **Disclosing:** When a person or persons claim to have experienced or witnessed GBV whether historical, current, or suspected, and tells a member of UHI Inverness staff, or a third party about this, whether via online tools, in-person, by email, during an appointment, phone call, or by other means. Different from 'Reporting'.

2.4 **Reporting:** When a person or persons chooses to use formal channels for the purposes of an investigation process by either UHI Inverness or the police, usually to pursue action against the alleged party.

2.5 **Confidentiality:** We are committed to keeping information confidential as far as possible. As such, information will usually only be shared with relevant individuals/entities, internal or external, with the explicit agreement of the person(s) seeking support. UHI Inverness may be under obligation to share information without this agreement in exceptional circumstances to protect somebody from serious harm and/or to maintain safeguarding duties.

2.6 **Ecological Framework:** A model of acknowledging a range of risk factors that perpetuate and facilitate GBV from the individual to the cultural and political. Using this framework shows an understanding that GBV is not just caused by personal qualities but by social and cultural norms and the wider global context. This highlights that preventative activities can span across the framework and tackles risk factors at various levels.

2.7 **Gendered Analysis:** This analysis recognises that gender inequality is both a cause and consequence of GBV. Rather than excluding men from support, it acknowledges that gender inequality, 'traditional roles', and stereotypes can negatively impact people of all genders and that those identifying as women disproportionately experience abuse related to this. GBV can involve people punishing others when they don't behave in ways that are expected of their gender, meaning the LGBT+ community are also at risk of GBV.

2.8 **Intersectionality:** "The concept of intersectionality identifies additional factors which interact with gender along other axis of power and discrimination to exacerbate the risk of experiencing GBV: including race, gender identity, sexual orientation, disability, age, poverty and areas of cultural diversity including religion, belief or ethnicity"⁵. For example, LGBTQ and BAME students can face additional barriers in accessing support and safety following GBV due to racism and unconscious bias, language barriers, and/or immigration status.

2.9 **Victim/Survivor:** Refers to the student(s), named or otherwise, who claim, or it is claimed have been subject to GBV past or present, regardless of if a report has been made or investigation carried out. Note that not all victim/survivors will disclose or report to UHI Inverness and may remain unknown.

2.10 **Third Party:** refers to a disclosure and/or report received by UHI Inverness and made by someone other than the victim/survivor or UHI staff member/contractor e.g., a fellow UHI Inverness student.

² Donaldson A., McCarry M. and McGoldrick R. (2018) [Equally Safe in Higher Education Toolkit: Guidance and Checklist for Implementing a Strategic Approach to Gender-based Violence Prevention in Scottish Higher Education Institutions.](#)

2.11 **Alleged party:** refers to the person/people, named or otherwise, whom a victim/survivor, or third party, claims has instigated, carried out, or in some instances facilitated, an act of GBV. This may be a fellow student, staff member, or external person(s).

2.12 **Precautionary Action:** In the event of an allegation of GBV misconduct, or if we become aware of information as part of our Student Criminal Offence Data policy, a student may be excluded from UHI Inverness until more information is known and or if there is risk of harm to themselves, other students or staff. Precautionary action is not a punishment but is intended to protect the interests of all parties. To maintain the safety of the victim/survivor, and the validity of any investigation, UHI Inverness must take steps to limit potential contact between alleged party and victim/survivor, including online, on campus, and in UHI residences. During this time, the alleged party will be able to continue to study remotely, if possible, will continue to receive student support funds, and continue to access support services.

3. Our Responsibilities

3.1 Staff GBV Awareness

This policy seeks to improve the knowledge and confidence of all staff. We are committed to providing our staff with mandatory training to support awareness of our GBV approach and to be able to support, signpost or refer students appropriately. We acknowledge the variety of roles, remits, and expertise of our staff across the entire institution, and as such training and learning opportunities are tailored. It is key that all staff and our Board of Management are aware of; what GBV is, UHI Inverness's GBV approach and how and when to signpost or refer students.

3.2 Student Awareness

UHI Inverness has a responsibility to ensure all students are aware of their own responsibilities in relation to adhering to the Student Code of Conduct, which specifies behaviours of Gender Based Violence that are unacceptable. Students may have additional responsibilities in relation to their behaviour if Fitness to Practice guidelines or Student Criminal Offence Data Policy applies. Students are given the opportunity to engage with the online Gender Based Violence Student Training Module, as well as internal targeted activities.

3.3 GBV Prevention through Awareness

This policy highlights our prevention responsibilities. Our GBV prevention goal is to raise awareness of GBV amongst staff, students, and our communities, to ultimately prevent behaviours that perpetuate GBV. Our approach to prevention is guided by the ecological framework and relies on partnership working and promotion of appropriate and impactful internal and external campaigns. Whilst we may share prevention or safety 'advice', we acknowledge that responsibility for GBV lies with those who perpetrate it and not with victims/survivors or bystanders. This policy along with relevant signposting will be highlighted on the student and staff facing webpages.

All staff can engage in opportunities that raise awareness of the policy, our approach, and of GBV in general. These may be arranged internally or externally, and Student Support Managers or deputised staff, may participate in Violence Against Women Partnerships to discover local opportunities for such. Local Communications Teams will be instrumental in ensuring messaging aligns with the approaches laid out in this policy, and reaches students appropriately e.g. social media.

3.4 GBV and the Curriculum

UHI Inverness endeavours to promote awareness of GBV, and values of equality and diversity, across our curriculum. Furthermore, where students participate in courses linked with potential front-line responses to GBV (such as Education, Health and Social Care, and Criminal Justice), we will endeavour to embed the themes and principles relating to GBV.

3.5 GBV Disclosures

This policy recognises that incidents of GBV are grossly underreported⁶. We therefore actively encourage disclosures by increasing awareness, availability, and accessibility, of GBV disclosure and reporting routes. GBV disclosures/reports can be submitted online in writing (anonymously if preferred) directly to our Wellbeing Team, via our accessible website reporting tool. Disclosures can also be shared verbally with any member of staff, who will liaise confidentially with our Wellbeing Team and/or Safeguarding Team for further guidance and/or their involvement, if required, as per the UHI Inverness GBV Disclosure Procedure. UHI Inverness respects that students may ask to speak to a specific member of staff (or staff of a particular gender, race, religion or sexuality, for example): staff will be happy to try and locate another staff member of a student's choosing and accommodate this request wherever possible.

Furthermore, to remove any potential deterrent to GBV reporting:

- In situations where students disclose or report any form of GBV, third parties and victim/survivors will not face disciplinary action for breaches of the Student Code of Conduct concurrent to the GBV incident(s), e.g., drug consumption, underage consumption of alcohol, academic misconduct, breaches of any pandemic (lockdown) restrictions etc.
- In their reporting-on/recording of a disclosure, staff will be mindful of not sharing person-identifiable information on protected characteristics without consent (outing). Outing broadly means disclosing the sensitive status of someone that could have the effect of threat, compromise, or penalisation for them, e.g., revealing someone's LGBTQIA+ status or pregnancy status.

In responding to a disclosure/report, staff will follow the UHI Inverness GBV Disclosure Procedure. The Wellbeing and Learning Support Team and the Student Support Team will maintain advanced skills in GBV disclosure handling and reporting. Regardless of route, GBV disclosures/reports will instigate a response to the reporting party, and/or an initial action, within 1 working day.

3.6 GBV Support & Intervention

We recognise that all types of GBV can cause harm and trauma. UHI Inverness has a duty of care to protect the health, safety, and welfare of its students. Student victim/survivors should not find that their studies end, and chances of success decline, because trauma-informed support was not offered or available. UHI Inverness strive to provide an equity of high-level intervention support to all victim/survivors, regardless of individual personal circumstances and employment/lifestyle choices. Our services are available to undergraduate and postgraduate students of any background, protected characteristics, or stage/mode of study. Service provision will depend on individual needs and circumstances, including location of study.

⁶ Rape Crisis Scotland (2020). Annual Report 2019-2020. [Available here](#).

4. Exceptions

This policy applies without exceptions, exclusions, or restrictions to all enrolled students.

5. Notification

5.1 All staff members will be notified of this policy and any changes to it and any related guidance through the normal channels.

6. Roles and Responsibilities

6.1 Learning, Teaching and Research committee is responsible for approving the policy and ensuring that it is followed. This committee are also responsible for ensuring the strategic effectiveness of the policy.

6.2 The Executive Management Team are responsible for operational compliance with and effectiveness of the policy, by ensuring that staff operate in an environment where they can fulfil their responsibilities in relation to the policy.

6.3 The Access and Progression Manager is responsible for collecting anonymised data regarding GBV within their partner – e.g., number of disclosures made and number of disciplinary cases involving GBV. They will be asked to share this anonymous data as part of UHI Inverness's annual Safeguarding report to the Learning, Teaching and Research committee.

6.4 Line managers should also ensure that staff can access the policy and are supported to implement it in practice – to do this, line managers should also ensure their staff can access appropriate emotional and development support given the sensitive nature of GBV.

7. Knowledge & Training Responsibilities

7.1 All staff are responsible for familiarising themselves with the policy and any associated guidance.

7.2 All staff must undertake the GBV E-Learning Module available on Brightspace every 2 years as part of mandatory LIST training.

7.3 The GBV Working Group, with support from the Professional Development team, are responsible for arranging GBV training from external agencies for staff as appropriate to their role.

8. Legislative Framework

- [Adults with Incapacity \(Scotland\) Act 2005](#)
- [Adult Support and Protection \(Scotland\) Act 2007](#)
- [Children and Young Person \(Scotland\) Act 2014](#)
- [Data Protection Act 2018](#)
- [Domestic Abuse \(Scotland\) Act 2018](#)
- [Equalities Act 2010](#)
- [Forced Marriage etc. \(Protection and Jurisdiction\) \(Scotland\) Act 2011](#)

- [General Data Protection Regulation \(GDPR\) 2018](#)
- [Human Trafficking & Exploitation \(Scotland\) Act 2015](#)
- [Mental Health \(Care and Treatment\) \(Scotland\) Act \(2003\)](#)
- [Mental Health \(Scotland\) Act 2015](#)
- [Police and Fire Reform \(Scotland Act 2012](#)
- [Protection of Children \(Scotland\) Act 2003](#)
- [Protection of Children and Prevention of Sexual Offences \(Scotland\) Act 2005](#)
- [Protection of Vulnerable Groups \(Scotland\) Act 2007](#)
- [Sexual Offences \(Scotland\) Act 2009](#)
- [Victims and Witnesses \(Scotland\) Act 2014](#)

9. Related Policies, Procedures, Guidelines and Other Resources

- UHI Complaints Handling Procedures
- UHI Concerned Parent Protocol
- UHI Fitness to Practise Guidelines (course-specific)
- UHI Mental Health Strategy
- UHI Placement and Externally Supported Learning Policy
- UHI Policy on Protecting Vulnerable Groups (PVG) Scheme membership for students
- UHI Safeguarding Policy
- UHI Safeguarding Procedure
- UHI Staff Guidance for Responding to Student Disclosures of GBV
- UHI Student Code of Conduct
- UHI Student Conduct Policy
- UHI Student Criminal Offence Data Policy
- UHI Student Disciplinary Procedure
- UHI Student Mental Health and Counselling Policy
- UHI Suicide Intervention and Risk Management Policy and Guidance
- [Equally Safe: Scotland's Strategy to Eradicate Violence Against Women](#)
- [Equally Safe in Higher Education Toolkit: Guidance and Checklist for Implementing a Strategic Approach to Gender-based Violence Prevention in Scottish Higher Education Institutions.](#)
- [LGBT+ People and Sexual Violence](#)
- [Respect UK Toolkit for Work with Male Victims of Domestic Abuse](#)
- [SafeLives DASH Risk Checklist](#)
- [UHI Gender Based & Sexual Violence Webpages](#)
- [UHI Inverness Staff Code of Conduct?](#)
- UHI Student Survivor Tool Procedures