

**Response to consultation
feedback**

EmilyTest Gender- Based Violence Charter

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**#EMILYTEST:
SUPPORT STUDENTS AFFECTED
BY GENDER-BASED VIOLENCE**





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Key

BAME = Black Asian and Minority Ethnic

Charter = EmilyTest's Gender-Based Violence Charter

DASH = Domestic abuse, stalking, and honour-based violence risk assessment tool

DV = Domestic Violence

ESCU = Equally Safe in Colleges and Universities

FE = Further Education

GBV = Gender-Based Violence

GDPR = General Data Protection Regulation

HE = Higher Education

*LGBTQIA** = Lesbian, gay, bisexual, transgender, queer, intersex and asexual

*NDA*s = Non-Disclosure Agreements


NHS = National Health Service

VAW = Violence Against Women

Overview

This document outlines EmilyTest's response to the feedback given by FE, HE, GBV, VAW and charity sector professionals on EmilyTest's draft GBV Charter.

EmilyTest presented the draft Charter and collected subsequent feedback from professionals through three online 'co-creation' sessions hosted in October 2020 and through a public, online survey published after the co-creation sessions, in November 2020. The survey aimed to get feedback on the Charter from those unable to attend the sessions or those who would like to add further, or anonymised, feedback. The co-creation sessions and survey together are referred to as the Charter's 'consultation'. However, although these are referred to as a 'consultation', it is important to emphasise that the Charter was presented in, and still remains, in draft format. Following on from releasing this feedback response document, EmilyTest will integrate the comprehensive feedback we have been given and run further co-creation sessions with professionals in February/March 2021.



EmilyTest also sought permission for the discussion in the co-creation sessions to be integrated into the research behind the Charter. Our full research findings will be presented through a public report released in February/March 2021, following on from a peer review process in January 2021. If you have not returned your consent sheet for your co-creation attendance, please return this to pgerrard@ed.ac.uk as soon as possible to ensure we can include your contributions in our research.

Foreword: challenges and learnings

By Poppy Gerrard-Abbott, University of Edinburgh PhD Sociology candidate and EmilyTest GBV Charter researcher

I want to start off by saying a huge, indebted thank you to the professionals who offered feedback to the GBV Charter at an unbelievably stressful time working during the COVID-19 pandemic. Special thanks go to those who have, during this pressurised period, managed to send heartfelt and in-depth responses that have helped the Charter formation endlessly. I was really blown away by the care, diligence, and dedication to 'getting this right' expressed in these submissions. We are incredibly lucky to be surrounded by not only colleagues with such compelling expertise, but ones that are willing to take time to share it when called. I was going to write to you all 'thank you for your generosity' but I think a more fitting 'thank you' is owed towards your determination to end GBV. Often our contributions are framed as altruism but from my experience in this field, it is a sense of anger and injustice towards endemic GBV, and a desperation for change, that brings people to the doorstep of projects like the Charter.

The creation of the draft Charter has been the most challenging project EmilyTest has embarked on and the most eye-opening that I have undertaken since starting my PhD research at the University of Edinburgh on sexual and gender-based violence in UK universities.


The implications of conducting the research behind the Charter during the COVID-19 pandemic cannot be underestimated. With little-to-no change in our timelines, we began just after the virus outbreak and worked tirelessly from March to November 2020, recruiting 180+ students and graduates across Scotland to take part in our digital focus groups and interviews. This included recruiting harder-to-reach populations, such as disabled, sex worker, LGBTQIA* and male students. The findings from this research have been overwhelming - the shocking stories shared with us by victims/survivors and the methodological, epistemological and ethical learnings we have been able to, and continue to, share with academia from adapting a sensitive research project of scale to the pandemic have escaped my imagination.

When our research turned to the charity sector and FE and HE staff, we witnessed widespread anger, fatigue and frustration. In my study and teaching of the social sciences during the pandemic, I have always referred to COVID-19 as a microscope to

society - the pandemic has not created new challenges and inequalities, it has exacerbated those that were already there and given us a more acute lens in which to understand them. Conducting the Charter research during the pandemic has brought many time-consuming barriers to the research process - but more importantly, it has shone a light on the lives of victims/survivors and the struggles of staff working immensely hard to support them.

From my roles in education and in frontline support, I want our research participants to know that I fully hear the realities of working in the neoliberal business model of FE and HE, and in the austerity climate that GBV/VAW services are operating within. The anger and passion for change that staff brought to our research was powerful and justified and will be represented in our research report. I was particularly moved by their anger towards all forms of sexism in FE and HE, the disparities between what employers say they are committing to and what actually happens on the ground, and the time, energy and morale professionals have lost to repeating the same messages and fighting what they feel is a losing battle. I was also inspired by colleagues' abilities to give us creative and bold suggestions for the Charter given their current work stresses, such as imagining a future outside of reporting models of justice and challenging the 'done way' of doing things.

It has been difficult to do every stage of the Charter creation perfectly because of the limited resourcing in GBV work and the multiple pulls on the time of GBV campaigners and researchers; challenges I am sure those reading this are very familiar with. Not only this but conducting this research during the pandemic has not been as simple as 'just transferring online'. It has warranted a more complex risk assessment of participants, a more in-depth support and safeguarding infrastructure for participants, a whole new set of ethical requirements and stages, a slower and more careful recruitment process - all taking place within the backdrop of existential crisis for FE/HE and of widespread illness (mental health-wise as well as COVID-19) among colleagues and loved ones. A few points in the feedback we were given - such as the co-creation sessions being too short and the Charter needing to be communicated better - stimulated a vulnerable part of my professional self, a full acknowledgement of such problems and a frustration that they would be so easily solved 'without COVID-19' and with infinite resourcing. We decided to carry on with the creation of the Charter during the pandemic and take the 'scenic route' rather than not embark on it at all. The latter would have led to not just absence of the draft Charter but of the research, which facilitated engagement with and study of



victims/survivors all throughout lockdown. I want to communicate to you all that every decision we made was surrounded by discussion on how we best engage students and staff at every stage of the draft Charter creation whilst respecting their wellbeing, workloads and time during a health crisis pulling them in every direction. Our decision-making processes did lead to some imperfections, which we have tried our best to explain in this response document.

I have taken away many learnings from my interactions with you all. We need to think very carefully about the realities of the 'post-COVID' era, the realistic scope of the Charter, the distinctions between FE and HE, the challenges faced by less-affluent institutions, the divisions in the feminist movement, and balancing the needs of students with what staff can deliver. The Charter has also at various points, continuously circled round to much more fundamental questions about preventing and responding to GBV in education. The particular issue on my mind at the moment is the customer service dynamic we have with students and the meanings of corporate responsibility in FE and HE - when we say we 'want the institution to take action', what does this actually look like? What are the measures for them having done this? I am also constantly pulled back to the issue of resourcing - how can we use the Charter to challenge institutions over casualisation and cuts?

Finally, I would just like to say how proud I am of our draft Charter and accompanying research. Feminism, to me, is a collaboration, a sisterhood, a refuge, and a revolutionary struggle, born from oppression and inequality. The Charter has not been solely authored by EmilyTest, it is the echo of hundreds of voices - now we have the beautiful challenge of making them all harmonise.

Thank you to Fiona, for her unwavering support and for reconnecting us all continuously to the reasons why we are in this work. The Charter is in Emily's memory - her story should always re-centre us when we feel lost.

Who responded to us

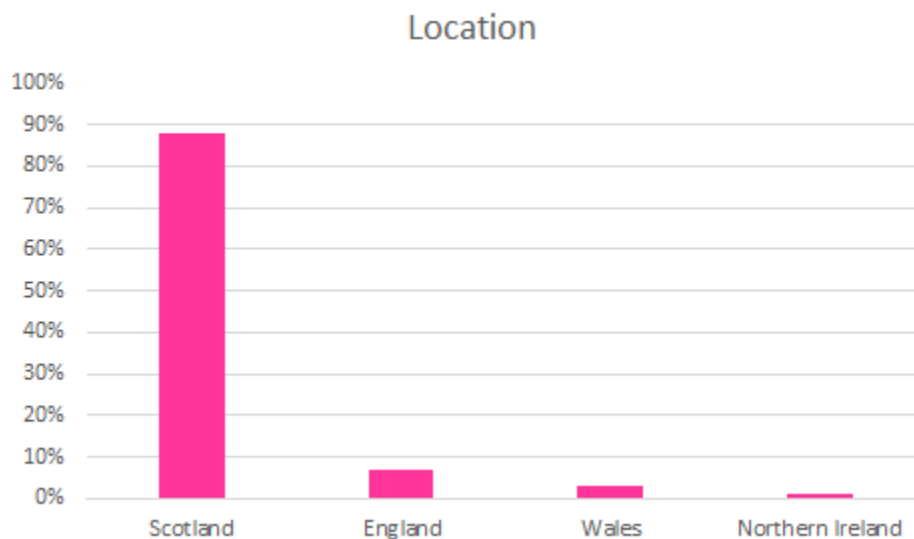
The first co-creation session was for VAW and GBV professionals, the second was for FE and HE staff, and the third was for charity sector staff. Overall, the co-creation sessions were attended by around 90 professionals.

There were 32 survey responses and 5 email and paper submissions. Some survey and email/paper submissions were authored by individuals and some by organisations with multiple signatories.

The VAW and GBV professionals were from organisations local and national, including Rape Crisis and Women’s Aid. The FE and HE staff were from a variety of roles in FE and HE, including Students Unions/Associations, welfare and student support services, student misconduct, accommodation, and management. The charity sector staff were from charities offering services to marginalised populations, such as ethnic minority women’s organisations and from specialist areas of GBV, such as revenge pornography - the vast majority of staff who attended our charity sector co-creation session were in frontline roles, such as helpline advisors.

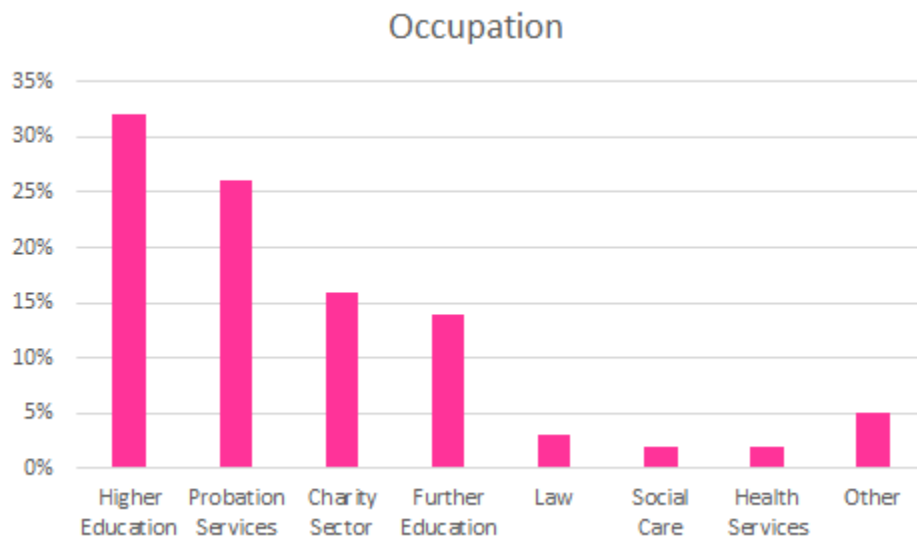
Survey

The survey asked participants what location and sector they are from.



Due to EmilyTest’s ambitions to expand the Charter to the UK, we did accept requests from professionals outside of Scotland to contribute to the survey and co-creation sessions. The UK-wide scope was also helpful to our research due the commonality of experiences and challenges in the sectors studied and due to the UK-wide scope of the EmilyTest researcher’s PhD project.

Occupation



A diversity of roles are represented in these percentages. Some survey participants did choose to disclose their job roles. These included: women’s support worker, Vice-Principal, wellbeing advisor, teacher, professor, prevention and education, Students Union/Association, bid and awards writer, safeguarding team leader, academic registrar, psychotherapist, hate crime case manager, GBV services manager, harmful content manager, head of engagement, pastoral care, researcher, legal practice, wellbeing service supervisor and manager, student support worker, student nurse and sexual violence prevention worker. Some survey responses were submitted by individuals, such as wellbeing service team leaders, and others by organisations, such as Universities Scotland.

Feedback summary

The most recurring feedback was:

- Concern over the tiered structure of the Charter
- The need for the Charter to differentiate between FE and HE
- Concern about less affluent, smaller, and/or rural and remote institutions being disadvantaged by the Charter
- Lack of resourcing and financing to rollout the Charter
- Worry about the Charter increasing workloads for staff, largely through expanding bureaucracy
- Buy-in and co-operation from senior management and key stakeholders

- Concern about the Charter being interpreted by FE and HE senior management as a ‘tick-box’ exercise
- Lack of communication about the Charter to the sector - staff think more needs to be done to raise awareness of the Charter creation, to increase engagement from FE, to disseminate the evidence behind the Charter, and to create a plain English version of the Charter
- A need to increase focus on prevention work and perpetrators, rather than always occupying a ‘responding’ role to GBV and focusing solely on victims/survivors
- The need for the Charter to meet institutions ‘where they are at’ and to be flexible in order to be implementable across the different types of institutions and adapt to varying levels of resourcing

Copy of the draft GBV Charter

We anticipate that most colleagues reading this document have already seen the draft GBV Charter because they attended the co-creation sessions and/or filled out the survey. If you need to see it for the first time or re-familiarise yourself, you can access the draft Charter here [via this Google Document link](#). If you have any problems accessing this link, or if you would prefer a PDF or Word document copy, please contact us. Contact details are at the bottom of this document.

Response to consultation feedback

EmilyTest’s response to the consultation is laid out in a table below. The left-hand column states the feedback given and the right-hand column states EmilyTest’s response to each point of feedback.

Please note that this table condensed recurring feedback into one point of feedback to avoid duplication as much as possible. The table does not name the feedback author because each point may have appeared across multiple submissions and therefore, may have more than one author. This is also to ensure feedback is treated with confidentiality due to feedback being addressed to EmilyTest and due to the survey allowing for anonymous submission.

General feedback on the GBV Charter

Feedback	Response
<p>When asked what colleagues thought of the co-creation sessions, the feedback was overall positive, but several people said that the sessions were too short and did not involve enough discussion.</p> <p>Three 90 x minute online sessions was deemed not enough to constitute 'co-creation'.</p>	<p>We have organised a second round of longer co-creation sessions in February 2021 - links for these can be found at the end of this document.</p> <p>The next sessions will be entirely focused on discussion - participants will be asked to read the revised Charter and the research report prior to attendance to 'hit the ground running' with dialogue. The discussion in the first round of co-creation sessions was limited by the fact we delivered a presentation on the Charter, which then informed discussion.</p> <p>It has been challenging to know how much time colleagues want to commit to the creation of the Charter during current times. We were concerned that if we organised a series of sessions, asking colleagues to attend numerous, this would have been deemed too high a commitment. Our approach to organising the sessions tried to be considerate towards current workloads, pressures and time restraints during the COVID-19 pandemic.</p> <p>Additional suggestions, contributions and comments can also be offered outside of the co-creation sessions by contacting us, as a number of you have done - contact details are at the bottom of this document.</p>
<p>Colleagues want us to consider Brexit and potential Scottish Independence</p>	<p>The Charter may need to be amended 'post-Brexit' to assure it is attuned to the UK legislation/policy that may replace European Union. We predict that this will be a process because new</p>

	<p>legislation/policy may be introduced over a period.</p> <p>However, this will only affect a very small number of recommendations, mostly data protection. There will be far more recommendations that will not be affected by Brexit than those that will.</p> <p>We follow Scottish Government definitions, strategies, and legislation in the area of GBV. If Scottish Independence were to occur, the legal unravelling from the UK would be a process, allowing time for adaptation. However, as the Charter currently will only be rolled out in Scotland, we do not foresee any issues relating to the impacts of Scottish Independence (this would be different if the Charter were to be rolled in another UK nation first and Scotland later).</p> <p>We do hope the Charter will be expanded to the UK once rollout in Scotland is complete. If it does, we commit to sharing our framework, learnings, and research with other nations/countries so that they can adopt and adapt it accordingly.</p>
<p>Colleagues report that it was unclear that they were offering feedback on a draft Charter rather than a finalised.</p>	<p>In the emails to co-creation participants, in the co-creation opening remarks and presentation, and in the consultation survey, it was stated that the Charter was in first draft format and open to change in relation to the feedback we would receive from colleagues.</p> <p>The version presented to colleagues was a translation of findings from our research with students, offering an ‘ideal scenario’ of what the Charter would look like if resourcing were not an issue and we possessed unlimited potential in what we</p>

	<p>could do. The draft Charter was intended to be a vehicle for inspiration and conversation in the co-creation sessions and was not intended to be interpreted as a finished artefact or as one we had concrete commitment to prescriptively following through on.</p> <p>We fully anticipated that future iterations of the Charter would go through significant change as we merged this 'ideal' with the recommendations and insights of staff.</p>
<p>Colleagues thought that the distinctions between the co-creation sessions and the consultation were unclear.</p>	<p>When we set up the online sessions for involvement of professionals in Scotland, we called them (and listed them on Eventbrite) as 'consultation' sessions.</p> <p>After receiving advice from colleagues who have created charters, we decided to rename them 'co-creation/consultation' sessions because we were a) presenting a rudimentary draft rather than a finished version of the Charter b) intending to integrate the staff contributions into our research, as findings about staff working in this area (hence why consent sheets were distributed).</p> <p>We accept that these changes may have caused confusion. The sessions would have ideally taken place face-to-face (where it is much easier to communicate such changes rather than through emails and online presentations), as with the whole Charter creation process.</p>
<p>Although 83% of those who responded to our survey agreed that the Charter should be led by principles, 13% responded 'no' and a further 5% 'unsure'.</p>	<p>We are pleased with this positive response but will meet with colleagues (who have experience creating charters) through a separate discussion/focus group in January/February 2021 to further</p>

	<p>explore the benefits and downfalls of a principle-led approach. Our peer review team also includes professionals with experience in charters.</p> <p>The specific aim of the principle-led approach is to ensure the Charter is a flexible framework that can be adopted on a national and cross-institutional basis. This is in line with much of the feedback we have received, which relates to the Charter needing to be less prescriptive. If a charter is not led by principles, the common alternative is stand-alone recommendations. We plan on the Charter being principle-led, with suggestions underneath each principle about how that principle can be practically achieved.</p>
<p>51% said that they are confident about the research process behind the Charter. 15% answered no, 21% somewhat and 13% unsure.</p>	<p>We will be releasing a public report of our research in February 2021, following on from a peer review. This report will be circulated on Facebook, Twitter and via email to colleagues.</p> <p>Staff who attend the second round of co-creation sessions in February 2021 will also receive a copy of the report alongside the access link to the sessions, at least one week in advance of the session.</p>
<p>61% answered ‘no’, ‘somewhat’ or ‘unsure’ when asked whether the tier system is <i>clear</i>. The exact same number said ‘no’ ‘somewhat’ or ‘unsure’ about <i>agreeing</i> with the tier system.</p> <p>Colleagues remarked that the tier system promotes a ‘punitive’ rather than an ‘enhancement’ approach.</p>	<p>The draft Charter presented to colleagues was in draft format and was intended to be a vehicle for conversation with colleagues. We fully anticipated that the tier system would go through changes.</p> <p>We will take this feedback on board through further meetings with colleagues who have experience in creating charters, to explore alternative ways to format the Charter. We will also bring this issue to the</p>

	<p>next round of co-creation sessions.</p> <p>The overall aim of the tier system is to incentivise institutions to work towards the next tier and to provide institutions with an award/marker for undertaking changes. It is not intended to be punitive but to mark and celebrate progress. Institutions will also work with a dedicated member of staff at EmilyTest to roll-out the Charter and move towards the next award status - we know that the sector has often felt alone and unsupported in rolling out recommendations.</p> <p>We will be revising the Charter recommendations and tiers to ensure that it is feasible for institutions to achieve the Charter. We will also rethink what will happen 'on the ground' when institutions meet or do not meet the standards and requirements the Charter asks of them - for example, what would happen if an institution possesses gold status but then a reporting student is failed.</p> <p>The research report, which will be released in February 2021, will demonstrate how we have translated findings into tiers.</p>
<p>Only 36% said that the Charter had enough of a focus on staff. 85% said they support the Charter covering staff-to-staff abuse.</p> <p>However, we received some written submissions that strongly disagreed with the Charter stepping outside of GBV among student populations.</p>	<p>We would like to increase the staff focus. The 1752 Group will be peer reviewing our research report - this report will also include a copy of the current Charter for them to critique. In addition to the peer review, we will meet with 1752 Group if necessary, to ensure the conversation about abuse among staff and staff-to-student is as in-depth as possible.</p>
<p>62% said they supported a ban on staff-student intimate relationships</p>	<p>EmilyTest supports this position. Linking to the above - the Charter will be revised to</p>

	<p>draw on recommendations and best practice from the 1752 Group through their participation in our peer review.</p>
<p>Colleagues feel uncertain about how the gold, silver and bronze levels had been decided</p>	<p>The research report released in February 2021 will detail how findings were analysed and translated into the recommendations and tiers.</p> <p>The tiers in the Charter were presented as a draft and will most likely constitute the most significant changes to the next revision of the Charter. As stated previously, the Charter presented was intended to be a rudimentary draft and as a vehicle for conversation in the co-creation sessions, rather than being approached as a finished artefact and/or what we think the Charter <i>should</i> be.</p>
<p>Colleagues are keen to know about how buy-in and cooperation from institutions and senior management will be achieved.</p>	<p>We are currently having conversations with our trustees about this and we will bring this issue to our next round of co-creation sessions for further discussion.</p> <p>The Charter is being created as an aid for institutions, streamlining processes and offering resources. It will be a visible indicator of good practice and a mark of excellence in relation to GBV prevention and intervention. Our position is that senior management should see gaining Charter status as a positive indicator of progress.</p>
<p>Colleagues are concerned about staff having enough time to invest into rolling out the Charter recommendations</p>	<p>We observe that colleagues are worried that the Charter recommendations, as they stand, will be time and resource intensive.</p> <p>The aim of the Charter is to make processes more seamless, consistent and centralised and therefore, reduce the workloads and the vulnerability staff are experiencing in their roles.</p>

	<p>We believe that if resources are invested into the right places and if processes are improved through the Charter recommendations, this will save time when colleagues are interacting with the institution’s systems and will ensure that time-consuming mistakes are avoided. The aim of the Charter is to reduce the pressure on staff by having effective systems in place, not to increase bureaucracy and workloads.</p>
<p>Colleagues would like to see a distinction between the FE, and HE sectors.</p>	<p>We are currently considering the option of two separate Charters or redesigning the Charter in a way that clearly outlines what is ‘aimed’ at FE and HE, or both.</p> <p>We fully understand that there are differences between FE and HE - however, the draft Charter presented was in draft format and this is why we invited both FE and HE colleagues to attend co-creation sessions. We have worked extremely hard over the course of 7 months to reach and engage colleagues and students from all institutions across Scotland and found some institutions and groups of students much harder-to-reach. Our effort to further engage with FE will continue in our next round of co-creation sessions.</p> <p>In addition, a pilot of the Charter will begin in March 2021. This will involve one FE and one HE institution. The learnings from this will be integrated into the final Charter. We anticipate that much of the adaptation and learning, especially with harder-to-reach institutions, will take place through this ‘on the ground’ engagement with a dedicated member of EmilyTest staff.</p>

<p>Colleagues are concerned about how the Charter fits in with the tenuous relations between the different strands of feminism and if/how it will focus on sex-based rights</p>	<p>The scope of the Charter does not involve 'solving' the tensions and conflicts around issues like sex worker and trans-inclusion in the feminist movement, but we welcome discussion in these areas.</p> <p>As previously stated, we adopt Scottish Government definitions of GBV.</p> <p>Our research was sex worker, LGBTQIA* and trans-inclusive because it is very well-evidenced that these are populations who experience GBV and the Charter is there to support any student affected by it. The Charter will include signposting to specialist, LGBTQIA*, transgender and sex worker support organisations as well as women's organisations.</p> <p>We have also worked hard to recruit an intersectional team of peer reviewers for our research report and Charter, which will include ethnic minority and LGBTQIA* academics/professionals.</p>
<p>Colleagues are concerned overall and in relation to specific recommendations about the financial commitment involved.</p>	<p>We will be revising the Charter recommendations to detail different 'options' to meet each award status. This is to ensure flexibility, feasibility, and inclusivity of smaller and less wealthy institutions.</p> <p>EmilyTest's priority is to ensure all campuses are safe places in which to live, work and study, regardless of institutional affluence. We will revise the Charter with every effort to avoid resource-heavy recommendations. It is not an intention of the Charter to cost institutions money.</p> <p>We will also be looking more broadly at how a principles-led approach (over a prescriptive list of recommendations) can</p>

	<p>facilitate flexibility and realistic change across all institutions. Each institution will also work with a dedicated member of EmilyTest staff to ‘work with what they have’ to meet award status.</p>
<p>Colleagues are concerned that senior management will use the Charter as a tick-box exercise</p>	<p>The communication and partnership working that institutions will have with EmilyTest (with both EmilyTest’s CEO and the new development manager that will be working with institutions to roll-out the Charter) will be an opportunity for us to stress the intentions of the Charter.</p> <p>We will also make sure an ‘anti-tick box’ message is central to all communications surrounding the Charter.</p> <p>An anti-tick box approach is also the thinking behind why there are more challenging targets in the Charter, such as the banning of NDAs in cases of abuse.</p>
<p>Colleagues would like to see how the Charter will benchmark and showcase areas of good practice</p>	<p>One Charter recommendation refers to an annual conference to act as a forum to share best practice. There has been some push back around this proposal, which we will bring to our next round of co-creation sessions to explore the reasons as to why.</p> <p>As the Charter aims to be a national and cross-institutional framework, it intends to provide a platform for the sector to work holistically, learn from each other and share good practice. Therefore, there needs to be some sort of forum for us all to come together.</p>
<p>Colleagues requested clarity about how confidentiality and risk will be approached in the Charter</p>	<p>Our position on confidentiality is that of the NHS and many areas of education - that confidentiality should be adhered to (and GDPR followed) but confidentiality can be broken in certain safeguarding circumstances.</p>

	<p>UUK are also planning on releasing guidance in this area, which our Charter will point to.</p> <p>Regarding risk - wherever possible in the Charter, we will draw on best practice models but for some years, professionals have raised the issues and limitations with frameworks such as DASH.</p> <p>With the help of many partners, we have created a risk assessment tool, which we have discussed with students in a large focus group. This will be shared with colleagues alongside the research report in February 2021 for discussion in the next co-creation sessions.</p>
<p>FE colleagues state that several Charter recommendations are not available for FE institutions</p>	<p>As stated elsewhere in this document, the current Charter is in draft format.</p> <p>We are considering whether a separate Charter needs to be created for FE. If we choose to stay with one Charter, we will structure it in a way that differentiates between FE and HE.</p> <p>We believe the pilot (commencing March 2021) will be the greatest opportunity for us to learn about the needs of FE because the pilot will be 'on the ground'.</p>
<p>Colleagues would like to see awareness of the Charter work raised</p>	<p>We are working with limited resourcing and have used public Eventbrite pages, Twitter, Facebook advertisements, our research, the EmilyTest website and email to raise awareness of the Charter.</p> <p>We would love to expand our communications but do not currently have a dedicated member of staff working on comms.</p>

	<p>This is compounded by the COVID-19 pandemic, where we were faced with a choice to continue the Charter work or delay (for an indefinite period). We chose to continue because GBV must remain high on the government’s and FE/HE agendas and we have a responsibility to deliver what we have been funded to undertake, within funding windows. The downside to this is that during the pandemic, colleagues’ workloads have significantly increased in amount and in urgency. We understand that everyone’s social media feeds and email inboxes are also saturated, as life has moved online. We are keen to ensure all stages of the Charter creation are approached sensitively in relation to the current workloads colleagues are facing, and avoid overwhelming colleagues with too much information about the Charter.</p> <p>We aim to increase visibility of the Charter by updating our website, continuing social media communications, and continuing to take up meetings across FE and HE.</p>
<p>Colleagues would like to see recommendations that focus on support for students who choose to report</p>	<p>We fully agree that the Charter should cover this. Our research with students found that victims/survivors are more interested in simply having spaces to be heard just as much as they are interested in seeing robust reporting mechanisms.</p> <p>We will revisit the recommendations to see how they can be more explicit in this area. However, there are already several recommendations that cover this, such as the GBV liaison officer (or a dedicated member of staff working on GBV), on-campus support (where applicable), signposting, stickers (or COVID-adapted</p>

	<p>alternatives) and local partnerships. We will add recommendations around where universities and colleges can find best practice frameworks for dealing with cases and disclosures. We also have created our own risk assessment tool, which will be circulated alongside our research report in February 2021, for discussion and feedback in our next round of co-creation sessions.</p>
<p>Male students and research participants raised the issue of inclusion of male victim/survivors</p> <p>They also raised questions about how false and malicious allegations would be addressed in the Charter.</p>	<p>EmilyTest was founded following on from the death of Emily Drouet - therefore, the focus of our work has been on women victims/survivors. Furthermore, our Charter employs Scottish Government definitions of GBV. GBV refers to violence and abuse towards gender-marginalised people - at the moment, this is often equated with 'VAW' but LGBTQIA* and trans-inclusive strands of the feminist movement in Scotland/the UK are lobbying for the full spectrum of GBV to be recognised as being beyond 'cisgender' women as the main or sole group of victims/survivors.</p> <p>We will go back to our Charter recommendations to revisit how we can ensure male victims/survivors are given the same support as female victims/survivors.</p> <p>The findings from our EmilyTest research with male students will be presented in our research report released in February 2021, so their participation in our research will have academic contributions as well as in relation to the Charter.</p> <p>In regard to false allegations - evidence shows that they are no higher than any other crime. The answer to this feedback point relates to ensuring that reporting</p>

	<p>and grievance processes are handled properly. What is ‘best practice’ in these areas is still evolving. We are going to revisit how the Charter can draw on existing best practice further in this area, as the issue of handling sexual misconduct allegations in ethical, supportive, and balanced ways is one that continuously re-emerges as an area of low confidence among both students and staff.</p> <p>One way we will be revising the Charter is pointing more explicitly to Universities Scotland’s taskforce and research on handling cases, to ensure all parties are treated equally.</p>
<p>Colleagues would like to know how EmilyTest will work in partnership with those paying for and delivering the Charter</p>	<p>Institutions will work with a dedicated member of EmilyTest staff to roll-out the Charter. This post will begin in March 2021.</p>
<p>Colleagues would like clarification about the scope of the Charter</p>	<p>The Charter aims to provide a list of institution-wide recommendations for FE and HE in Scotland in the areas of GBV prevention, intervention, and support, based on the ESCU Toolkit and our own research.</p> <p>In terms of geographic scope, EmilyTest has an ambition to extend the Charter to the UK. However, this ambition will be a) discussed once rollout to Scotland has been evaluated and b) discussed in relation to the PhD findings of EmilyTest’s researcher, whose own research is UK-wide, to assess the feasibility. This ambition will also have to navigate the possibility of a second Independence Referendum in Scotland and how independence may impact legal and policy approaches towards GBV and</p>

	FE/HE governance.
Some colleagues feel the Charter is too reporting-focused	<p>The current draft Charter mentions reporting 7 times out of 72 recommendations.</p> <p>In addition, our research with 180+ students and graduates across Scotland consistently mentioned a need for robust reporting options/pathways. As mentioned before in this document, the Charter presented to professionals was in draft format. We were presenting an initial draft based on the research with students as a representation of their wishes and needs. The aim of the co-creation sessions was then to take the Charter in its 'ideal scenario' draft (which includes everything students said they would like to see) and then intersect that with suggestions, contributions and needs of professionals, to then go on and create the final draft Charter.</p> <p>However, we do strongly agree with the wider critique that reporting is often, too heavily focused-on as the only option available to victims/survivors and as the only way to 'get justice' (both in and outside of FE/HE). EmilyTest believes that justice is subjective and personal to victims/survivors. We endorse a view held in GBV/VAW services, that the priority is the safety of victims/survivors - however, to ensure the safety of victims/survivors, our research revealed how this often involves some form of disclosure to their institution so that appropriate measures can be taken to keep the student safe - for example, moving classes or accommodation. Therefore, it is important that strong reporting pathways are available to those who want or need them.</p>

	<p>In terms of expanding focus to alternative ways of responding to GBV (such as community groups and creative projects), we fully support this. However, there are as many questions to be answered about these methods, such as: how can we measure their effectiveness and impact? How can we ensure the safety of facilitators and victims/survivors? How can we make recommendations in these areas without exacerbating workloads and financial strain? How can we promote these methods without exacerbating casualisation in FE and HE - many of these projects fall onto the shoulders of unpaid volunteers.</p>
<p>Some colleagues disagree with the tiered structure of the Charter to the extent that this critique presents an ‘existential’ threat to the Charter. The concerns about the tiered structure often relate to investment and how it may advantage more financially robust institutions.</p> <p>Some colleagues also pointed out that the competitive tiered structure may work against the collaborative culture being fostered in the sector. There may also be tensions between victim/survivor expectations and higher tiered (gold) award status institutions.</p>	<p>The Charter we presented to the sector is in draft format, based on an ‘ideal’ of what students from our research process said they would like to see. We take on board this feedback and will now seek to revise our Charter accordingly by ensuring we work with institutions based on ‘what they have’.</p> <p>The challenge is to find a model that would be more successful than one with a tiered structure. We will continue to explore this.</p> <p>There are advantages to the tiered structure that make sense in the competitive climate of FE and HE - we are working in an environment of marketised education. It is normal to see initiatives having a competitive approach. For example - other charters in FE and HE take this approach and professionals who offer GBV training compete for funding and contracts. However, when we designed the draft Charter, it was not our</p>

	<p>intention to exacerbate competitiveness - it was intended to incentivise and mark change.</p> <p>Nevertheless, we are keen to explore alternatives to the tiered structure as we hear the disadvantages and the concerns that colleagues have laid out. This includes taking on board suggestions relating to Scotland's Quality Enhancement Framework (QEF). We have also met with professionals working with other Charters to hear what has not worked.</p> <p>We will take this recurring, key concern about the Charter having a tiered structure to our next round of co-creation sessions.</p>
<p>Colleagues would like to see the Charter adapted to a blended learning model, which may be in place for some time due to the pandemic.</p>	<p>Agreed - the Charter we presented to the sector is based on our research with students across Scotland. We found that they engaged with the research based on the assumption that face-to-face/in-person college/university life will return in the near future - this is also a widely held belief and hope, promoted by colleges/universities themselves.</p> <p>The evidence base about COVID-19 has been evolving during the <i>process</i> of our research and Charter creation. This includes: identifying and understanding the impacts of emerging variant strains of the virus, and ever-evolving scientific predictions about the timeline of immunisation and the longevity of lockdown policies. Knowledge on the virus has been 'live'. When the draft Charter was being created, expert and public knowledge of the pandemic was in its infancy. Now that we have a more in-depth understanding, we can adapt the</p>

	Charter accordingly.
<p>Colleagues point out that COVID-19 has exacerbated what has been described as “emergency years” in FE and HE by the Scottish Funding Council.</p> <p>Colleagues feel the Charter appears to be resource and funding-intensive, which would make it infeasible and would exacerbate this situation.</p>	<p>The Charter aims to be developed in a way that it will act as an <i>aid</i> for staff, and if implemented effectively, will reduce workloads, stress and limit room for error. This in turn will reduce costly errors and external consultation fees with legal experts. We aim for the adoption of these practices to lead to a more efficiently run institution (for both staff and students) regarding dealing with GBV. It aims to follow calls for streamlining, rather than adding more paperwork onto colleagues’ desks. We will revisit the Charter with this key intention in mind.</p>
<p>Colleagues would have liked more opportunities for senior staff to engage in the creation of the Charter. Going forward, colleagues would like more of these and for the Charter to consider peer support/sharing networks for professionals in FE and HE.</p>	<p>We agree that opportunities for engagement and input should be maximised as much as possible. We have responded by creating another round of co-creation sessions. Additionally, we will present the Charter to senior management, as agreed with Universities Scotland.</p> <p>The annual conference recommendation was geared towards offering peer support, collaboration and sharing. However, this conference proposal has faced disagreement and we want to explore these views more in our next round of co-creation sessions - if not the conference format, then what format?</p> <p>We also do not want to treat engagement, sharing and collaboration as ‘one-offs’. However, it is very challenging to gauge and get consensus around how much engagement and time staff (at all levels) would be willing to commit, especially during the COVID-19 pandemic. With the annual conference, for example, we</p>

	<p>deemed this a realistic amount of engagement with the Charter creation (in addition to institutions working with a dedicated member of EmilyTest staff to roll-out the Charter) but as already stated, the conference idea has met with pushback.</p> <p>Concerning the co-creation sessions, we ran 3 x 90-minute sessions, and this was deemed not enough - however, we are concerned that if we created regular sessions, colleagues would have deemed this too high and inconsiderate of their other priorities. We will discuss appropriate and achievable levels of engagement at our next co-creation sessions.</p>
<p>Colleagues are concerned that the Charter could see staff acting beyond their expertise</p>	<p>We agree this is an excellent point and that remits need to be better emphasised in the Charter. It is not beneficial (for anybody) for this to be the case.</p> <p>However, challenges remain around creating an infrastructure and culture of community support and intervention (around GBV but also other areas such as mental health) in FE and HE whilst keeping remits tightly bound. This is a challenge faced by, for example, the Prevent strategy - many professionals are now expected to have counterterrorism and counter-radicalisation integrated into their roles. This increases workloads and makes staff act beyond their remit - many have felt like they are acting as surveillance mechanisms, border control or police officers. The Charter will remain mindful that colleagues are not 'experts' and not ask them to be such.</p>
<p>Colleagues would like to see the Charter</p>	<p>As already stated in this document, we will</p>

<p>better align with Universities UK's ongoing project to provide guidance on staff to student sexual misconduct.</p>	<p>amend the Charter to explicitly state this alignment. EmilyTest is a member of the Student Misconduct Review group set up by Universities Scotland to examine the Pinsent Masons guidance developed by UUK. By working closely with Universities Scotland and other stakeholders, we will ensure the Charter aligns with the recommendations from that project.</p>
<p>Colleagues would like to see more information on how institutions would demonstrate delivery against the Charter's recommendations and what manner of reporting EmilyTest's accreditation process would consider to be satisfactory. There is also concern that some of the recommendations relate with output measures.</p>	<p>We agree that this needs to be clarified in the Charter.</p> <p>All institutions working to roll-out the Charter will be supported by a dedicated member of EmilyTest staff. This staff member would also be responsible for collecting information on progress and adherence and would assist in making judgements as to whether a recommendation has been achieved. We are currently considering what 'panel' would be put together to review an institution's Charter status - it is likely this panel would be a revolving mixture of experts.</p> <p>This feedback point relates to other points around ensuring the Charter is enhancement-based rather than punitive, which we aim for the next revision to really focus on. Additionally, we remain mindful the Charter recommendations do not become bureaucracy-increasing exercises, adding unnecessary pressure to existing workloads. This would be counterproductive.</p>
<p>Colleagues would like to see the terminology surrounding 'recommendation' clarified and revisited.</p>	<p>We agree that this is unclear because an institution would need to meet <i>requirements</i> in order to achieve Charter status.</p>

	<p>We used 'recommendation' because the Charter was in draft format i.e., 'this is what we would recommend currently in order to achieve x principle / Charter status'.</p> <p>This will be amended as we take on board feedback about enhancement-based approaches. We will be moving away from the Charter being a list of tick-box recommendations. This format was simply a draft version, reflecting our research with students about what they would like to see, which we then subsequently listed in the draft Charter.</p>
<p>Colleagues reiterated several times that they felt the current Charter has a tick-box approach and does not consider the diversity of institutions</p>	<p>The current version of the Charter is a draft and was intended to act as a vehicle for conversation in the co-creation sessions. Therefore, the things students would like to see in the Charter were translated into bullet points, to then see what staff made of them.</p> <p>The final version of the Charter, based on the excellent feedback we have gathered from co-creation, will seek to have an enhancement-based approach and be more flexible and principles-led in order to take both of these feedback points on board.</p> <p>Regarding the diversity of institutions - we worked hard to achieve equal engagement across FE and HE, and across rural, remote, and online institutions as well as city, town, and campus-based institutions. We found this very challenging, especially during the pandemic, and some institutions and groups did not respond to our callouts and invitations over a series of months. Our next round of co-creation sessions will try</p>

	<p>again. We are also considering separate Charters for FE and HE - our opportunity for exploring and clarifying this will most likely be during practical application during our pilot in March 2021.</p>
<p>Colleagues think that more consideration needs to be given to online learning environments.</p> <p>In line with this, colleagues want to know how the Charter will adapt to the COVID-19 pandemic, given the uncertainty of current circumstances.</p>	<p>The need for the Charter to be adaptable to online learning is essential for not just institutions that are permanently online/run any online courses, but for all institutions during the COVID-19 pandemic. We do not currently know how long this will impact HE and FE.</p> <p>This is where the 'COVID-19 crisis plan recommendation' comes in, allowing institutions to have quick and easy measures 'on-file' or at their disposal, to provide appropriate GBV support. However, we do recognise that if COVID-19 presents more long-term or permanent changes to FE and HE then all recommendations in the Charter will need to be 'COVID-adapted'. This includes translating recommendations into digital versions, removing infeasible recommendations, and following evidence-based understandings around which forms of GBV are particularly pertinent to address during the pandemic.</p> <p>However, we do aim for the next version of the Charter to focus on being flexible according to each institutions' learning format. We will increase efforts to work with the Open University in our second round of co-creation sessions.</p>
<p>Colleagues feel there needs to be more information on how EmilyTest and the Charter will interact with senior management so that they do not pay 'lip service'. Many colleagues think Athena</p>	<p>Whilst we draw from charters such as Athena Swan, we have also learned valuable lessons on what works and what does not. We hope our work behind the Charter reflects our commitment to</p>

<p>Swan began as a ‘force for good’ but ended up a tick-box exercise.</p>	<p>ensuring the Charter does not end up a tick-box exercise.</p> <p>Senior management have, to date, engaged very positively with the work of EmilyTest, supporting our aims and ambitions. We will continue to work collaboratively at all levels of management to ensure buy-in, especially through the appointment of our engagement manager in March 2021. We will also maintain a critical approach towards institutions as well as a collaborative one.</p>
<p>Colleagues would like to see how the Charter will address GBV with ‘international elements’, such as forced marriage, FGM, HBV by family/community members outside the UK</p>	<p>As previously mentioned in this feedback response document, the Charter recommendations will cover GBV as a spectrum. We will also ensure our signposting and partnership-working recommendations cover ethnic and religious minority organisations.</p> <p>This feedback does highlight another layer of complexity regarding ‘GBV beyond borders’. GBV beyond the parameters of the institution is highly complex for FE and HE - and we have experienced disagreement towards other Charter recommendations covering, for example, study abroad and perpetrators with no relationship to the institution.</p> <p>We are going to engage with the NHS and study abroad teams in Spring 2021 to respond to this feedback. Furthermore, the Brexit-related uncertainty surrounding the Erasmus scheme may bring a timely opportunity to ensure consideration of GBV is embedded into future exchange agreements.</p>
<p>Colleagues are interested in how the Charter will specifically address study</p>	<p>There are mechanisms in place for misconduct whilst on a study abroad or</p>

<p>abroad</p>	<p>fieldwork placement. We are going to investigate these further by arranging meetings with study abroad and placement teams. We will integrate these findings into our Charter revision.</p>
<p>Colleagues state that the Charter needs to focus more on trauma. One suggestion is linking with the NHS initiative on making the workforce, and society as a whole, more trauma-informed.</p> <p>Another suggestion relates to running climate surveys, to allow people to share their experiences anonymously.</p>	<p>We will revisit the Charter recommendations to more explicitly refer to disclosure handling being trauma-informed. EmilyTest works with many organisations who focus on taking a trauma-informed approach and this will be reflected in the final Charter document. We agree that this could have been referenced more in the draft.</p> <p>This feedback point relates to a recurring concern among FE and HE professionals; that they do not possess enough guidance and support around handling disclosures and cases of misconduct.</p> <p>We are also going to engage with the NHS in Spring 2021.</p> <p>We will absolutely consider the point regarding climate surveys, whilst also recognising that FE and HE workloads are extremely high during the pandemic. This is perhaps a task EmilyTest could undertake or one that could allow us to work collaboratively with Report and Support to determine any regional or national trends.</p>
<p>Colleagues would like to an increase in Charter recommendations on harm prevention, especially those focused on perpetrators</p>	<p>The Charter will provide signposting resources to institutions, which will include signposting support and help for perpetrators. This will focus on drawing on existing resources, such as the current assets, support stickers, and support cards. Obviously, digital alternatives will replace all of these if necessary, as on-</p>

	<p>site/in-person learning is COVID-dependent.</p> <p>We will revisit recommendations to enhance focus on perpetrators, including how this focus could be integrated into safeguarding and how students/staff can act when they are concerned about someone’s behaviour. We are also continually exploring the development of training for both staff and students. This training could be delivered as part of the Charter, therefore reducing costs for institutions.</p>
<p>Colleagues would like to see a ‘scaffolded’ or ‘hand-holding’ approach for FE on how to gain a particular status and how to take the next steps to improve, based on ‘where they are now’</p>	<p>A dedicated member of EmilyTest staff will work with all FE and HE institutions to roll-out the Charter. This post begins in March 2021, when we plan on running a pilot of the Charter in one college and one university.</p> <p>The recommendations are intended to be structured in a bullet-pointed, step-by-step way, hence the current formatting. However, this point of feedback (among others) shows us that we need to redesign this in a more simplistic way - such as flexible frameworks or a flowchart.</p> <p>FE professionals have stressed the need for less academic frameworks and more plain English. The next version of our Charter is going to strongly focus on plain English wording. It will go through a peer review and proofreading.</p>
<p>Colleagues would like to see the Charter address punishments for perpetrators. Many professionals support perpetrators being excluded but recognise that this has financial repercussions for institutions in the fee-paying model context</p>	<p>‘Punishments’ and report outcomes will be determined by the student conduct and Human Resource policies of individual institutions.</p> <p>We recognise that responses to GBV are</p>

	<p>shaped by the fact that fee-paying students have a ‘customer service’ dynamic with their institution.</p> <p>Handling reports/student misconduct is a recurring concern for professionals in FE and HE. Clarissa Humphreys and Professor Graham Towl, who recently authored a book on best practice concerning handling sexual misconduct, will also be part of our peer review team and will add suggestions to the Charter.</p> <p>The next version of the Charter will also be explicitly referring to UUK’s and Universities Scotland’s best practice work in this area - the Pinsent Masons guidance has suggested sanctions within it. These sanctions are being addressed as part of the Student Misconduct review as aforementioned.</p>
<p>Colleagues are concerned that smaller and less-financially resourced institutions, especially in FE, will not be able to buy-in reporting platforms</p>	<p>Agreed - we hosted an event in August 2020 discussing concerns about trends of privatisation in the sector. One concern is the cost of private reporting platforms. However, we support the intelligent analytics and the merging of GBV and racist incidents in reporting platforms like Report and Support. We are also pleased to see consistency emerging, which will offer many cross-institutional and UK-wide data insights, and we are pleased to see people working in GBV having their work valued and properly paid for.</p> <p>EmilyTest are actively involved in encouraging regional collaborations, which are particularly effective in reducing costs attached to reporting platforms. Fearless Glasgow have proposed a regional pilot with Report and Support - quotes for this work have demonstrated</p>

	<p>the ability to save a 6-figure sum, meaning implementing this system is within reach of less affluent colleges and/or universities.</p> <p>We will revisit recommendations to ensure that the Charter clearly does not promote private options as necessary to achieve higher tier status. However, where these options are the most effective, we will continue to be inventive in trying to ensure these are within reach of all institutions. EmilyTest are strongly against students being disadvantaged because they attend a less affluent institution. We believe in equal support for all students.</p> <p>We also currently have a recommendation around regularly reviewing private platforms. Discussions are ongoing around how we can set standards for platforms contracted in.</p>
<p>Colleagues want to know how the Charter aligns with the Equality Act (2010)</p>	<p>We will revisit the Charter recommendations to ensure that they clearly state alignment. The research report, which will be released in February 2021, will also outline how the Charter aligns with the Act.</p>
<p>Linking to the above, colleagues want to know how the Charter aligns with existing legislation, reporting requirements, and existing charters. FE and HE are already subject to significant pressures in these areas.</p> <p>This alignment is essential in order to ensure buy-in.</p>	<p>Firstly, the Scottish Government has given funding for the Charter and therefore, this is a desired piece of work.</p> <p>The revised Charter will be informed by the ESCU Toolkit followed by a national scoping exercise carried out by the researcher. We are absolutely committed to ensuring that the Charter compliments and follows on from these pieces of work as we are against discarding valuable resources and research to then ‘reinvent the wheel’.</p>

	<p>The next version of the Charter will state much more clearly how it aligns with the areas pointed out. It may reassure colleagues to know we work closely with other charters and will ensure previous errors which have occurred in charters are not repeated.</p> <p>However, we would like to mention that the draft charter will be scaled back to minimise paperwork and ensure the Charter is helping rather than hindering colleagues.</p>
<p>Colleagues are concerned that the Charter may require resources and finances (and absorb those resources into data gathering over other important efforts such as training) that are already under pressure in FE and HE, worsened by the COVID-19 pandemic.</p>	<p>The revised Charter will be scaled back and focus on ensuring that institutions with less financing/resources are not disadvantaged.</p> <p>Alongside integrating an enhancement-based approach, we will be revising the Charter in a way that makes it a flexible framework that works with institutions on a 'come as you are' basis. This will be supported by the fact that all institutions will be working with a dedicated member of EmilyTest staff to roll-out the Charter with the resources they have.</p> <p>The data collection aspects will be particularly focused on in the next revision of the Charter.</p>
<p>Colleagues are concerned that the Charter is overly-focused on certain 'types' of institutions, such as campus universities.</p>	<p>The revised version of the Charter will address both a) the language currently employed b) the recommendations, to ensure that they are relevant and flexible to all institutions.</p> <p>As mentioned previously, the draft Charter was a presentation of the Charter as an 'ideal', based on our research with</p>

	<p>students and what they want to see. The most engagement we experienced was from students in city institutions and therefore, this will mean the draft may lean in particular directions. The purpose of having multiple stages in the Charter creation is to identify and fill gaps.</p>
<p>Colleagues are concerned about the Charter's over-reliance on a small group of organisations - mostly Rape Crisis and Women's Aid.</p>	<p>The Charter is being created by a not-for-profit charity. We work closest with VAW and GBV professionals due to their shared ethos and long-standing expertise.</p> <p>Furthermore, as colleagues state at various points, institutions are facing immense financial and resourcing pressure. The more affordable options are always VAW and GBV professionals over private enterprise in areas like training.</p> <p>The only places in the Charter where organisations like Rape Crisis and Women's Aid are mentioned is in regard to training and EmilyTest have sought and gained firm assurance from these specialist organisations that the proposed model of support is comfortably within their capabilities.</p>
<p>Colleagues would like to see a greater focus on intersectionality in terms of partnerships and signposting</p>	<p>We will ensure the revised Charter explicitly refers to ethnic and religious minority organisations.</p> <p>The signposting list we use (for research, for interacting with victims/survivors etc.) and that we can provide for institutions during Charter roll-out is comprehensively intersectional.</p> <p>Ethnic minority, LGBTQIA* and sex worker organisations were invited and mostly, attended, our other co-creation sessions. Our research engaged with a number of</p>

	<p>marginalised groups, including sex worker, disabled and ethnic minority students - the findings from this hope to provide academic contributions as well as informing the Charter.</p> <p>One challenge around signposting is ensuring that information is accessible - i.e., not overwhelming people with a long list of contacts - whilst also being comprehensive and ensuring the needs of different social groups are met.</p>
<p>Colleagues stated that it is unclear how institutions will apply for Charter status</p>	<p>All institutions will be contacted by EmilyTest to fill out an application form in February/March 2021. The applications will be reviewed and responded to by our development manager (due to start March 2021) and potentially, a panel of revolving and diverse professionals.</p> <p>Information-collecting for Charter status will be supported by the development manager. The tier status will be reviewed by a panel.</p> <p>We will bring this information forward to our next round of co-creation sessions - we could not previously confirm this as we had not secured the funding for the post mentioned.</p>
<p>Colleagues would like more information about applying to be a pilot institution</p>	<p>Our Charter pilot will begin in March 2021. This will involve one college and one university working with the new member of staff at EmilyTest (the development manager will begin their post in March 2021) to test rolling out the Charter.</p> <p>To apply to be a pilot institution, an application form will need to be filled out. This application form will be circulated in February/March 2021 by email and social</p>

	<p>media. Given the interest that has been expressed in the sector, there is a possibility that more than one college and university will be chosen for the piloting phase, in order to accept as many applications as we can.</p> <p>The application process may involve, unfortunately, rejecting some institutions for the pilot but any rejected institutions will be supported around applying for Charter status. We can only select a small number of pilot institutions so that we can get the Charter 'right' before further roll-out and so that we can conduct the pilot within our resourcing levels.</p>
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Feedback on the 5 Charter principles

If you need to re-familiarise yourself with the draft GBV Charter presented at the co-creation sessions, [please find it here](#).

Principle 1: Intersectional and Accessible

Students and staff are taught to possess a nuanced and complex understanding of GBV and how both victimisation and processes of accessing help are fundamentally shaped by age, gender, geography, race, sexuality, disability, English language abilities, religion, visa status and occupation. Signposting and reporting in the university/college are tailored to and sensitive to these factors. They provide a range of options for victims/survivors - from peer support to official reporting procedures - and are also very easy to find and use, with the most marginalised students being the 'benchmark' for accessibility.

Feedback	Response
Colleagues feel concerned about the practical application of this principle	The practical application relates to following the recommendations listed under each principle (see Charter draft): https://docs.google.com/document/d/1dkAEoh0gZ_99x6-

	<p>_gujy7UKXwDjPaMPVPCWPHpbT_z0/edit</p> <p>We agree that all recommendations in the Charter need to be a) scaled back and b) reachable for both FE and HE.</p> <p>As already stated in this document, we are going to focus on the next version of the Charter being less of a prescriptive bullet-point list and more focused on a flexible framework. We will also focus on simplifying language</p>
<p>Some colleagues recommended adding pregnancy and maternity status</p>	<p>Agreed - we will add this in.</p> <p>There is a wider discussion about how to focus on all the different facets of GBV without ‘diluting focus’. Strong remits and signposting are needed to ensure that staff are not expected to ‘be experts in everything’.</p> <p>Equipping staff and the university/college community with signposting to support is one current recommendation of the Charter.</p> <p>Going forward, we will consider more closely how the Charter can link staff and students with resources, such as support cards and stickers. There has been a lot of work already in Scotland to create and distribute resources (see endGBV.uk) - in line with the ESCU Toolkit and we are very keen for the next version of the Charter to <i>build on</i> and <i>reiterate</i> existing work/resources.</p>
<p>Colleagues want to know where they will find the resource - physical and financial - to deliver training</p>	<p>EmilyTest has always been transparent with the sector and the Scottish Government that we expect both to commit to resourcing GBV prevention and intervention.</p>

	<p>However, universities and colleges are already investing in GBV training and we think it is pivotal that the most affordable and credible options are chosen, which is why we have attempted to make recommendations in these areas. We also do not wish to increase these costs. Instead, we wish to make processes and training as affordable, sustainable and streamlined as possible - this is absolutely in our interest in order for the Charter to be embedded and long-lasting.</p> <p>One major learning from the co-creation sessions is that the Charter needs to meet institutions 'where they are' in terms of resources and financing and offer a flexible framework. Our next version of the Charter will focus on this key concern.</p> <p>EmilyTest is working with many partners across Scotland to develop training that complements the free training currently available from Rape Crisis Scotland. This again will save institutions significant sums of money and deliver peace of mind regarding safety and effectiveness of content.</p>
<p>Colleagues highlighted concerns about peer support models being used to support victims/survivors</p>	<p>We agree with the critiques raised regarding peer support. Our research also involved a number of participants disclosing the difficulties of running peer support groups, detailing the harms that can be caused by them.</p> <p>We are going to revisit how we can refine a recommendation that relates to victims/survivors coming together to connect and share experiences whilst keeping boundaries between this and finding advice and practical help.</p>

<p>Colleagues want to know what is meant by 'benchmarking against the most marginalised students?'</p>	<p>This means that support services and reporting pathways need to be accessible to marginalised students - this is how we should define 'accessibility'.</p> <p>The whole Charter will be rephrased to reflect feedback on the need for plain English. As stated in other parts of this document, we created the draft Charter with limited resourcing. We are currently seeking resourcing around proofreading and communications.</p>
<p>Colleagues would like clarification about whether training would be mandatory, and whether it would be delivered to all staff at an institution.</p>	<p>The Charter would like to see a minimum level of training required in each institution.</p> <p>We agree that the Charter needs to clearly state who the training should be for.</p> <p>We agree that mandating training has problems and will bring this issue to our next round of co-creation sessions.</p>
<p>Colleagues reported that the recommendation relating to covert entrances and disclosure spaces was not feasible for many institutions simply due to their infrastructure.</p> <p>This is compounded by the fact that staff who deal with GBV are not staff who will make strategic decisions about space.</p>	<p>Agreed - we do not want the Charter to make impossible demands.</p> <p>This was based on recommendations to us from GBV/VAW professionals working in rural and remote Scotland. Furthermore, our student research stressed how pivotal confidentiality is and how even processes of seeking help can send ripple effects out into the university/college community, as others can become aware of an incident.</p> <p>We will revise this principle to be framed as best practice rather than a requirement for award status.</p>
<p>Colleagues stated that they would like to see online spaces for disclosure added</p>	<p>Agreed - we will adapt the Charter language accordingly to overtly state this. This is an oversight - we very much support online reporting platforms and</p>

	<p>made an assumption that where reporting is mentioned in the draft Charter, colleagues should assume we mean face-to-face <i>and</i> digital.</p> <p>A challenge we are still discussing in relation to the Charter is digital poverty and how to be inclusive of students that have less tech accessibility and/or literacy, who may be more ‘shut out’ of university/college life, especially during the COVID-19 pandemic.</p>
<p>Colleagues would like to see recommendations on how information/support can be accessed out-of-hours</p>	<p>The recommendation about a 24/7 GBV service in the draft Charter was intended to be a vehicle for discussion in the co-creation sessions about what such a service could look like - all our research with students suggested is that such a service <i>should</i> exist.</p> <p>Currently, the only service that exists along these lines is the 24/7 UK DV helpline. Various recommendations in the draft Charter refer to clear signposting. The DV helpline, the Samaritans and university Nightline services will be included in such signposting lists. However, there are limitations to the Samaritans and Nightline - only the 24/7 DV helpline service is specialist to GBV.</p> <p>We would like to discuss with the sector, in the next co-creation sessions, how existing services could be upskilled and/or how solutions to contracting in a 24/7 service could be found.</p>
<p>Colleagues highlighted that not all HEI’s understand or use terms such as ‘liberation officers’ / ‘Reslife’</p>	<p>Agreed.</p> <p>The language in the draft Charter is a reflection of higher engagement in our research process from certain HE</p>

	<p>institutions/student populations.</p> <p>As mentioned before in this document, institutions with less resourcing, in FE, and in rural and remote Scotland are harder-to-reach than urban and larger institutions. We made numerous attempts to engage with rural and remote FE and HE students/staff through Eventbrite, social media, and personalised emails. We found this to be a process with many barriers. Engaging with hard-to-reach populations in research processes can ‘end up’ a whole different project in itself. However, we have identified the areas of lower engagement and will continue efforts in our next round of co-creation sessions.</p>
<p>Colleagues stressed that it is important to ensure all marginalised people are represented in the Charter</p>	<p>Agreed - our research engaged with disabled, neurodiverse, BAME, international, male, sex worker, postgraduate, LGBTQIA*, non-monogamous, commuting and mature students. Our peer review process, which will review our Charter and research report in January 2020, has invited an intersectional team of scholars and professionals from across the UK.</p>
<p>Colleagues would like detail on how the Charter would ensure fully vetted staff to take on those roles</p>	<p>We would like the Charter to ensure appropriate staff are Protecting Vulnerable Groups (PVG) checked.</p> <p>Our research did highlight widespread conduct issues concerning student accommodation staff and Resident Assistants (RAs) following on from 3 x UK-wide focus groups we conducted with current and former RAs. The findings from this will be in our research report and we will take these issues to our next round of co-creation sessions.</p>
<p>Colleagues felt that LGBTQIA* and BAME</p>	<p>Agreed - we will revise the</p>

<p>staff are vital for services, as well as non-native English-speaking counsellors.</p> <p>However, requests for specific staff members only work if institutions <i>have</i> staff that can support them. Colleagues are concerned some institutions may be disadvantaged because of their demographics or because of availability/resourcing.</p>	<p>recommendations in a way that does not disadvantage institutions who cannot do this.</p>
<p>There was some feedback around unclear terminology such as "liberation officer"</p>	<p>Agreed - we have found the co-creation sessions extremely useful to reflect on how the Charter uses language that centres richer, larger, and urban institutions. We will revise the language in the Charter.</p>
<p>Having a full-time GBV liaison officer and Rape Crisis/Women's Aid on-campus might be difficult or near impossible for smaller institutions</p>	<p>Agreed - we will revise the recommendations in a way that does not disadvantage institutions who cannot do this.</p> <p>We will also look at how existing regional collaborations can ensure less-affluent institutions can access such support measures, drawing on and supporting networks such as Fearless Edinburgh and Fearless Glasgow.</p>
<p>Counselling services should be in bronze</p>	<p>Agreed - this will be moved. Again, the Charter was presented in draft form and was subject to change.</p>
<p>One colleague wrote: "funding is already a challenge. Where will this funding come from? The gold standard would only ever be aspirational within my organisation due to the cost implications"</p>	<p>The Charter will be scaled back accordingly, and we commit to engaging senior managers in ways that advise stronger resourcing for pastoral, welfare and student support services.</p> <p>As stated, a number of times in this document, the Charter will be flexible to work with the resources available within individual institutions. The draft was a</p>

	<p>translation of student wishes based on our research with students - it is an 'ideal' and not finalised.</p>
<p>Colleagues stressed that they want to see recommendations and guidance around follow-ups with students who have reported</p>	<p>Agreed - this needs to be explicitly mentioned in the Charter.</p> <p>We saw this as falling under the existing Charter recommendation about reporting timelines.</p>
<p>Colleagues would like to see robust support systems for anyone working in the area of peer support, and for GBV liaison officers</p>	<p>We firmly agree that support needs to be in place for those who <i>deliver</i> support.</p> <p>It is essential that the Charter is trauma-informed, and this includes protecting staff as well as students.</p> <p>We will think about how this can be translated into a recommendation, such as line management/supervisions/peer support networks.</p>
<p>Colleagues feel that 'GDPR compliance with disclosures' is unclear and fails to recognise the need to balance confidentiality with the need to exercise duties of care to the full community.</p>	<p>This recommendation comes from students telling us that their reports have been handled in non-confidential ways, such as staff openly discussing their case, their case becoming lost, or staff involving many people in email chains. This can have devastating emotional, psychological and practical impacts.</p> <p>However, we agree that the wording is unclear. In line with the NHS and many areas of education, we support the position that confidentiality needs to be broken sometimes - many colleagues have reported needing guidance on this, however. Our revised Charter will refer to appropriate guidance being developed by UUK. EmilyTest can update on this particular piece of work at the next co-creation session.</p>

Principle 2: Open and Learning

Universities and colleges have an open ‘it happens here’ stance, acknowledging their duties of care towards both students and staff in relation to GBV. They should reflect their reverence for evidence-based approaches in their responses to GBV: publishing statistics, attending conferences, drawing on best practice and adapting to new evidence, feedback and the evolving COVID-19 crisis. Universities and colleges both contribute to and draw on the field, being active community members in preventing and responding to GBV.

Feedback	Response
<p>Colleagues asked us to explain the “it happens here” stance</p> <p>Colleagues also reported that senior management “want to believe it doesn’t happen here” and that zero tolerance policies are often tick-box exercises with little or no reflection in cultural attitudes towards GBV.</p>	<p>Our research revealed that students observe institutions are concerned about cases reaching the media/damaging their reputation, over dealing with GBV.</p> <p>EmilyTest has regular dialogue with the media over this issue. We have been asking journalists to focus on the institutions with low reporting figures, rather than those with high, as the former suggests students are not accessing support therefore puts into question if there are clear pathways. We will continue this engagement with the media.</p> <p>We hope the Charter will help mark change and we have been working with a new wave of VC’s in HE who understand the damage of placing reputation before life.</p> <p>We believe that many institutions are realising the highest risk to their reputation is not to do anything at all, and we want the Charter to reiterate this through GBV policies. We will revisit how we can ‘reward’ institutions that take honest approaches towards GBV and have leadership that takes it seriously.</p>

	<p>The EmilyTest staff member working with institutions to roll-out the Charter will work on partnerships with senior management.</p>
<p>Colleagues highlighted that Data Protection and GDPR legislation are contradictory with the information the Charter requests</p>	<p>Firstly, the Charter is being formed during the departure of the UK from the European Union. We commit to the Charter being attuned to changes as this transition occurs, which may affect GDPR.</p> <p>EmilyTest also understands restrictions but also thinks GDPR should not be used as a shield to 'hide behind'. As long as the information is proportional, justifiable and relevant, the Information Commissioner's Office (ICO) will not challenge. As mentioned before, UUK has set up a national taskforce with the aim of devising guidance for the HE sector. Colleagues will be updated when this is finalised. EmilyTest will seek clarity from the FE sector about their protocols.</p>
<p>Colleagues recommend that the breakdown of GBV statistics should also report in intersectional ways, such as on age, ability and ethnicity.</p>	<p>We agree that this would be helpful, but we need to consider issues around increasing paperwork for institutions. We will take this point to our next round of co-creation sessions.</p> <p>Whilst there is strong evidence on GBV in education as a result of ten years of research, there is a lack of data a) from institutions themselves b) on intersectional understandings. Such data would be useful for both academic and policy purposes - and potentially for institutions themselves.</p>
<p>Colleagues asked whether it would be possible to recommend Institutions provide data on the 'consequences' or 'outcomes' of reports or grievances</p>	<p>We agree that this would be desirable.</p> <p>There is evidence showing some institutions are adopting such practices within the guidelines of GDPR: https://www.dur.ac.uk/notices/discipline/</p>

	We will bring this feedback point to our peer review team.
Colleagues reported that they would like to see agreement at a national level on issues like institutional reporting responsibilities	Agreed - the Charter needs to, in our next revision, differentiate between where it can and will create national standards and where it needs to be highly flexible (where cross-institutional consistency may not be desirable).
Colleagues said the Charter needs to be more realistic: the annual review recommendation should be a biennial review because reviewing can take several months	Agreed - we will give consideration to this. We will continue to work with the sector to find achievable timescales in the Charter recommendations without diluting efficacy. This proposal (for an annual review) was just a draft suggestion to see what colleagues thought.
Colleagues would like to see the Charter recommending that FE and HE institutions need to follow the 1752 Group's recommendations	Agreed - we already work closely with the 1752 Group and they will be part of our peer review team. They will review both our research report and our Charter in January 2021, making suggestions about how to integrate their work.
Colleagues would like the Charter to explore how there can be incentives for institutions to disclose data on GBV cases, without fear of dropping popularity levels for incoming students	<p>This is where our tiered structure comes in - our thinking behind this was that it would complement the competitive structures of FE and HE and offer a mark of excellence showing responsible approaches to GBV prevention and intervention within institutions.</p> <p>We will discuss this point in our next round of co-creation sessions to see how incentivisation can translate into a practical recommendation, as we have faced pushback on the tiered structure.</p>
Colleagues would like clarification on what is meant by a 'COVID-19 crisis plan'	The COVID-19 pandemic saw GBV move 'further down on the agenda'. Subsequently, EmilyTest wrote a letter of recommendations and worked with UUK

	<p>and Advance HE to guide institutions around fulfilling their duties of care and adapting services to the pandemic. We would like to integrate this letter into guidance for institutions to turn to during the ongoing COVID-19 pandemic, in the case of future pandemics.</p>
<p>There needs to be a distinction made between NDAs in relation to sexual misconduct and other NDAs. Colleagues feel that the current wording is unclear and needs to be specified.</p>	<p>Agreed - we should have clarified in the first draft.</p> <p>In September 2019 EmilyTest called for a ban on NDAs in abuse cases. This was supported by the Scottish Government, Universities Scotland and UUK. We did however note the need for them in areas of University business. Colleagues can reference minutes here https://www.gov.scot/publications/equally-safe-in-colleges-and-universities-minutes-september-2019/</p> <p>Our apologies for this oversight - we wrongly presumed colleagues might be aware of this.</p>
<p>Many colleagues disagreed with the annual conference attendance</p>	<p>EmilyTest believes it is important to share good practice, hence recommending an annual conference. The value of such opportunities for the sectors to work together has previously been evidenced through EmilyTest and ESCU. We are absolutely committed to teamwork and want to translate this into practical steps and recommendations.</p> <p>Discussion on this will continue in the next round of co-creation sessions. If any colleagues would like to expand on why they disagree on the conference recommendation before attending the sessions, you can find our contact details at the bottom of this document.</p>

	<p>Currently, payment would be required for attendance on a not-for-profit basis. However, this could be negated by holding it online during the pandemic and beyond. Furthermore, EmilyTest would explore sponsorship opportunities for these events if our funding wouldn't cover it.</p>
<p>Colleagues noted that VAW partnerships need to go through continuous monitoring.</p>	<p>The EmilyTest staff member working with institutions to roll-out the Charter will support institutions in their development and maintenance of partnerships.</p>
<p>Colleagues would like to see an increased focus in the Charter on the role of education in combating all types of GBV.</p>	<p>Agreed - the draft Charter currently mentions training and we are attempting to ensure quality training is available. We are working to build a long-term model of training that would stretch from school age through to tertiary education.</p> <p>In addition, we also recognise that some university and college modules already cover GBV, such as gender studies and sociology courses. We are considering how the Charter can recognise this.</p> <p>Another issue EmilyTest has raised is the lack of methodologies to evidence what methods work to prevent GBV. These insights are needed to create robust education programmes and this is an area we would like to address in the near future.</p> <p>Another issue is the fact that students and staff arrive at institutions with highly variant sex and relationships education. EmilyTest aims to meet with the NHS in January 2021 on issues such as diversity and inclusivity in relation to sexual health.</p>

<p>Colleagues frequently asked the question: what about institutions sharing best practice?</p>	<p>The annual conference is intended to be a forum for best practice sharing.</p> <p>Discussions are also ongoing about the resurrection of the ESCU Hub however we recognise this hasn't been as successful as initially hoped. Discussions are ongoing.</p> <p>We welcome colleagues' suggestions by emailing us (contact details at the bottom of this document) or by attending the next round of co-creation sessions to discuss, as some colleagues disagree with the conference recommendation.</p>
<p>Colleagues feel that the recommendation concerning standardised feedback and evaluation process for private companies runs in conflict with the autonomous nature of FE and HE institutions and disregards the expertise within private enterprises, and outside of Rape Crisis, Women's Aid etc.</p>	<p>EmilyTest is a not-for-profit charity. We endorse VAW/GBV professionals over private companies due to their shared ethos and their long-standing expertise.</p> <p>Furthermore, as colleagues have stated, institutions are facing financial/resourcing pressure. The more affordable options are always VAW/GBV professionals over private enterprise. EmilyTest would like to see FE and HE supporting organisations working with victims/survivors over private companies, as their students will be signposted to these organisations.</p> <p>The only places in the Charter where organisations like Rape Crisis and Women's Aid are mentioned is in regard to training and evaluation of private companies - the former will remain and the latter will be revisited.</p>
<p>Colleagues are concerned about the annual publication of GBV reporting statistics in terms of resourcing and confidentiality</p>	<p>Institutions will work with a dedicated member of EmilyTest staff who will support you to carry out this task.</p> <p>Furthermore, this information is often</p>

	<p>requested through Freedom of Information (FOI) requests - publishing statistics pro-actively would reduce the workload around these.</p> <p>Statistics will be anonymised concerning the people (staff and students) involved with cases.</p> <p>We will bring this issue forward to our next round of co-creation sessions as we are curious as to whether colleagues think institutions would be willing to 'go public' with their statistics.</p>
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Principle 3: Knowledgeable and Empowered

Students and staff are equipped by their institution with the knowledge and tools to recognise and take action towards GBV. There is a culture of 'coming forward' supported at all levels. Students are reached out to with meaningful messaging and know exactly where to come forward. Students and staff have the freedom to speak and are validated, being given supportive rather than judgmental responses

Feedback	Response
<p>Colleagues often stressed that the most important point of the principle should relate to staff and students being aware of where to report, how to report and encouraging them to do so</p>	<p>The current draft Charter covers reporting, but we will look to see how we can enhance this.</p> <p>We agree that students and staff should be informed about the range of options available to them.</p>
<p>Colleagues state there should be more of a focus on male students and staff as 'active bystanders'.</p> <p>Colleagues would like to shift away from the Charter's focus being "all on victim and after the event has occurred"</p>	<p>We agree that the Charter's focus should increase on prevention work.</p> <p>Bystander work is only one part of the training that is recommended. There is also mixed evidence about bystander approaches - EmilyTest has recently raised the issue that we need to establish methodologies for measuring/evidencing</p>

	<p>the impact of different approaches.</p> <p>We also suggest that training does not solely focus on male students, as women can be ‘passive’ too. EmilyTest is in discussions with many partners including VRU (bystander), Medics Against Violence, Police Scotland, Rape Crisis, Women's Aid and many more organisations, exploring the development of training that is quality-assured, cost-effective and sustainable. We want to eradicate any unnecessary spending for institutions: this will be a core approach/value of the Charter.</p> <p>The Charter focuses on both prevention and intervention. We take on board feedback and will look to see where clarity and improvements can be made.</p>
<p>Colleagues would like to see an emphasis on whistleblowing policies in the Charter, to promote a culture of openness</p>	<p>Thank you for this helpful point. EmilyTest will explore this further and discuss in more depth at the further co-creation sessions.</p>
<p>In relation to open day awareness raising, colleagues think it is unclear how this could be efficiently and effectively measured</p>	<p>Agreed - this recommendation needs to be reworded to clarify what is meant by this. This would include institutions displaying their zero-tolerance stance and raising awareness about what services are available to students.</p> <p>As stated, numerous times in this document, there are currently no widely established frameworks and methodologies within GBV work to assess ‘what works’. This is something EmilyTest wants to explore as soon as possible, through conducting further research.</p>
<p>Colleagues think that there needs to be awareness among students living in halls of residence/accommodation about the bystander effect</p>	<p>We agree it is important to raise awareness in halls of residence but also across the whole university community. GBV happens all around us, not solely to</p>

	<p>students in halls. It is important that we equip all students and staff with this knowledge, regardless of if they live on-campus or off-campus.</p> <p>The draft Charter covers student briefings (which will cover escalating concerns and intervening in incidents) Charter training will include a section on the role of the bystander, but we will look at how role model/ambassador systems and signposting can be better integrated into accommodation.</p>
<p>Colleagues would like clarification on the where the budget come from for staff training and what levels of staff would be mandated to do the training</p>	<p>A dedicated member of EmilyTest staff will work with institutions to roll-out the Charter. Part of this role will involve supporting institutions to deliver with the budget they have.</p> <p>The Scottish Government have also invested in training with Rape Crisis Scotland.</p> <p>As stated in other parts of this document, we want to ensure the Charter helps institutions to save money, not for finances to be a barrier.</p>
<p>Colleagues are concerned that training before matriculation is problematic as IT systems need to be in place. This could also increase workloads for staff at the busiest time of year - arrivals.</p> <p>There is also concern about how this could be made compulsory and what the ramifications would be if students did not participate.</p>	<p>We agree that these are excellent points, especially around how the institution would respond if students do not engage.</p> <p>Students also already receive a very high volume of email traffic and online training/administration requirements from the institution.</p> <p>Furthermore, this could also be problematic for students in a number of areas: if English is not their first language, if they need disability adjustments, if they are less technological fluent, or if they</p>

	<p>have not had prior sex and relationships education.</p> <p>We welcome further comments at the next round of co-creation sessions. We are working with St Andrews to draw from their experience of making workshops mandatory before matriculation. We will discuss this in the next co-creation sessions.</p>
<p>Colleagues ask: “if an institution already has training in place, how could this be adapted so that it is endorsed by GBV/VAW professionals given that some institutions develop materials in-house?”</p>	<p>Our next version of the Charter will make such recommendations more flexible so that in-house materials are recognised. We acknowledge many institutions have GBV experts in-house and, of course, their insights are extremely valued and valid too.</p> <p>Feedback of this nature is what has made our co-creation sessions so helpful, allowing us to get insight into, for example, the full range of resources and possibilities inside institutions.</p>
<p>Colleagues would like clarification on what EmilyTest means by ‘endorsement’ by GBV/VAW professionals and what is classified as a ‘GBV/VAW professional’.</p> <p>Colleagues would like to see the internal experience in colleges and universities recognised and celebrated in the Charter.</p>	<p>EmilyTest works closely with both the GBV/VAW third sector and GBV/VAW academics.</p> <p>We agree that our colleges and universities have a wealth of expertise who will continue to work with us to ensure safe, high quality and effective content of all training.</p> <p>Institutions adopting the Charter would work with a dedicated member of staff at EmilyTest. This staff member would facilitate the GBV/VAW endorsement, which refers to Rape Crisis, Women’s Aid etc.</p>
<p>Many colleagues agree with the point about compulsory staff training but</p>	<p>Rape Crisis Scotland are currently funded by the Scottish Government to deliver staff</p>

<p>wanted specification on what this training would involve</p>	<p>training. Additionally, an online tool for staff has been developed by the University of the Highlands and Islands and Anni Donaldson. You can access this helpful resource through this link: https://staffresources.uhi.ac.uk/GBV/ There are recommendations in the ESCU Toolkit in this regard too. If further need for training is identified, EmilyTest will work with institutions to achieve this.</p>
<p>Some colleagues stated that they would like compulsory student briefings to include the consequences of DV behaviour</p>	<p>Agree - we will amend the recommendation accordingly to inform students about the law and university/college policies.</p> <p>EmilyTest also strongly advocates for the use of case studies, as does the ESCU Toolkit. Charter training will include not only Emily's story but those of other victims/survivors too.</p> <p>Additionally, anecdotal evidence indicates a lack of awareness of the legal implications of sharing of intimate images, for example.</p>
<p>Colleagues ask: "Is there any evidence that the GBV cards and stickers work?"</p>	<p>Anecdotal evidence tells us staff find these resources helpful. Student feedback suggests the same of the stickers. An evaluation will be conducted by US and other project stakeholders in 2021.</p> <p>The aim of these is to increase the visibility of signposting in student spaces - bedrooms, study spaces, the library, changing rooms. We want the Charter to support approaches where signposting is embedded into the institution rather than ringfenced to one place, such as student support.</p>
<p>Colleagues would like clarification on what training is 'suitable' and what is meant by</p>	<p><i>Suitable</i> refers to: endorsed by GBV/VAW professionals, comprehensive (covering all</p>

<p>'briefing'.</p>	<p>areas of GBV and outlining where to turn if you or someone you know has experienced GBV) and trauma-informed (considering trauma to the delegate).</p> <p><i>Briefing</i> refers to: a live lecture, talk or workshop. Many institutions already run these, when students arrive in accommodation or on their first day of university. A briefing is the sharing of information deemed essential to keep students and staff safe.</p> <p>As mentioned previously, the next version of the Charter will focus on a) plain English wording b) fully explaining each recommendation.</p>
<p>Colleagues would like clarification on what the role of the Charter is in regard to other hate crimes</p>	<p>The Charter's primary focus is to tackle GBV in education. However, we understand that GBV often intersects or runs parallel with other hate crimes and this is why we support the integration of reporting processes.</p> <p>We will ensure the Charter makes reference to this in the next version.</p> <p>We continue to collaborate with colleagues working on racial abuse, for example, at the University of the West of Scotland (UWS). There is a team leading the racial discrimination work at UWS, who are working with us in relation to the Fearless Glasgow Report and Support regional pilot, given Report and Support is a platform for reporting all forms of abuse.</p>
<p>Colleagues mention that GBV leads/champions need to be clearly identified and named in all education communications - for example 'ask me about GBV/intimate partner violence/HBV'</p>	<p>This is an excellent point - an institution can have a GBV lead/advisors in place, but the next step is ensuring students (and staff) <i>know</i> about them. We will strengthen focus on this in the Charter.</p>

	<p>One example of good practice is Glasgow Caledonian University’s First Responders programme, where first responders have different colour passes and signs on their doors. Their names are clearly visible on their website for students to access at all times. The EmilyTest staff member working with institutions in the roll-out of the Charter will share knowledge of these programmes when working with individual institutions and assist in implementing them.</p> <p>There are other issues surrounding this point that need addressing, such as Search Engine Optimisation (SEO) of GBV support in colleges and universities. The language employed by institutions for GBV support workers also dramatically varies - for example, ‘sexual violence’ (often used interchangeably with GBV) and ‘misconduct’. Furthermore, the policy language employed often does not resonate with the GBV experiences of students and staff such as ‘dignity and respect policy’. This is a challenge for the Charter because the Charter intends to facilitate sector/nationwide consistency whilst respecting the individuality of institutions.</p>
<p>Colleagues would like FE and HE universities to <i>promote</i> the Ask Angela scheme if it is going to be in place, as there needs to be awareness and take-up if the scheme is applied.</p> <p>Colleagues also pointed out that Ask Angela is appropriate to campus-based institutions.</p>	<p>Agree - we will amend recommendations accordingly.</p> <p>We also advocate for other such programmes like 'safe taxi' and women-only taxi services.</p> <p>In line with revising the whole Charter to ensure it does not baseline campus-based institutions, we will amend recommendations like this to become less</p>

	<p>prescriptive.</p>
<p>Colleagues in FE and from smaller universities said that they feel the recommendations under this principle would be difficult for small and/or specialist institutions to achieve</p>	<p>Agree - this is a recurring point of feedback.</p> <p>We will be scaling back the Charter and making it more flexible.</p> <p>We will also consider how specialist institutions would work with the Charter and will increase efforts to engage with such institutions in our next round of co-creation sessions.</p>
<p>Colleagues mentioned that the university cannot mandate anything concerning the Students' Union/Association. Colleagues feel the Charter currently conflates Students Associations/Unions with the university/college.</p>	<p>The Charter aims to cover both because GBV, and disclosures/cases, can occur 'under' both.</p> <p>The EmilyTest staff member working with institutions to roll-out the Charter will be responsible for working with both, so they will be the facilitator of this.</p>
<p>Colleagues would like to see the opportunity to report anonymously highlighted</p>	<p>This is a helpful point. EmilyTest agrees with anonymous reporting pathways because anonymous reports are useful for statistics and are more likely to lead to open disclosures/reports. We will amend the Charter to explicitly state this. We also continue to work with Report and Support in their analysis of such data.</p>
<p>Colleagues point out that mandating SU-managed social media pages and societies to include signposting is not feasible as they cannot instruct Students Unions/Associations</p>	<p>As previously stated, the draft Charter presented to colleagues was a draft based on our student research and therefore, a representation of what students would like to see.</p> <p>SU venues and societies are key areas where GBV occurs so it is essential the Charter covers this.</p> <p>The EmilyTest staff member working with institutions to roll-out the Charter will be</p>

	<p>responsible for working with both SUs and universities/colleges, so they will be the facilitator of this.</p>
<p>Colleagues feel the recommendation around having signposting in staff automatic replies is unclear</p>	<p>The Charter will be revised accordingly to specify.</p>
<p>Colleagues feel the recommendation around 'outing' in GBV policies is unclear</p>	<p>Outing refers to publicly disclosing someone's marginalised status (as a sex worker or LGBTQIA*, for example), which the Charter seeks to address.</p> <p>However, we agree this needs to be reworded.</p>
<p>Colleagues are concerned about the recommendation on compulsory student briefings before matriculation from university. This concern relates to enforcement, assessing impact, and triggering psychological distress</p>	<p>Given that the last ten years of research on GBV in FE and HE shows us that many students experience some form of sexual violence or harassment in their first week, we have to take action before fresher's week.</p> <p>GBV prevention, help and support information would be integrated into existing student briefings. Students will be signposted to reporting pathways/support at the end of such a briefing to get support for distress. Such briefings often do lead to disclosures as well, so reporting pathways (in and outside of the institution) should be linked up here.</p> <p>We agree that aspects of this should be left 'up to' individual institutions, such as whether such briefings are run in-person</p>

	<p>or shared through other routes. The Charter recommendation is based on timing, not method of delivery.</p> <p>In regard to assessing impact - as stated previously in this document, there are currently no widely established methodologies to accurately assess 'impact' and effectiveness. This is something EmilyTest would like to explore.</p>
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Principle 4: Comprehensive and Connected

Policies cover every angle of an institution including its 'pockets' of community: transport, private university housing, night venues and accommodation. Policies are comprehensive, covering all areas of GBV including FGM, revenge pornography, stalking, and honour-based violence. Policies are specialist to the ways that GBV 'manifests' on university and college campuses and recognise the scope and capabilities of institutions. Systems are centralised, cross-departmental and modern.

<p>Colleagues want to know where the Charter recommendations sit in relation to policies that reference sexual harassment</p>	<p>The Charter will cover all forms of GBV. Sexual harassment is one form of GBV.</p> <p>We are going to reframe the Charter in a way that 'meets institutions where they are at'. For example, if they have a policy on sexual harassment, how could they merge this or expand the scope of it to cover other forms of GBV? Are there forms of GBV that are particularly prevalent due to the demographics of their student and staff population?</p> <p>EmilyTest are working on a GBV policy template for institutions to use, as it is essential that changes are as simple and time efficient as possible. We also know a few institutions (including in FE) that are authoring them and would be keen to</p>
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	<p>share these examples. However, we also respect that the policies in place at an institution will have a history behind them and be a reflection of the in-house expertise and will only advise on amendments if we identify areas for improvement.</p>
<p>Colleagues would like to see 'politics-free' information on transactional sex/sex work</p>	<p>Agreed - we will think about this in relation to the Scottish Government's Equally Safe strategy and how the Charter can better support students and staff who are sex workers.</p> <p>The Charter aims to support all students affected by GBV and this is our core mission.</p>
<p>Colleagues worry that this principle may require cultural change to deliver the practical recommendations</p>	<p>We recognise that cultural change is a key challenge and a complex question - what do we mean by cultural change? How can we stimulate or implement it? How do we measure what works?</p> <p>We are going to investigate cultural change models further in relation to this feedback point.</p>
<p>Colleagues point out that the term 'image-based sexual abuse' should be used over revenge pornography</p>	<p>Thank you - noted, this will be changed.</p>
<p>Colleagues would like to see the Charter addressing social media posts, mobile apps used by students, and chat groups with inappropriate content</p>	<p>Agree - the Charter needs to refine and enhance recommendations concerning digital mediations of GBV</p> <p>EmilyTest successfully lobbied TikTok to remove harmful content that glorified GBV. We continue to work with them and other platforms to remove, and limit exposure to, dangerous content. Previously, we campaigned for removal of a mobile application called YikYak, an anonymous platform that was widely used</p>

	<p>by student communities and was a source of cyber-abuse and intense distress for many students. This app is now obsolete.</p>
<p>Some colleagues would like to see a sector-wide approach in relation to this principle.</p> <p>They would also like to see more consideration in the Charter around easing individual institutional burdens and increasing student understandings of the spectrum of GBV.</p>	<p>The challenge here is that institutions will experience different levels of the different kinds of GBV, shaped by demographics. As stated in this feedback point, the key here is to “ease the institutional burden” around making GBV prevention and support comprehensive.</p> <p>The Charter needs to focus on facilitating resources for institutions to draw on, so they can easily assess and pick up resources that meet their needs. One of our aims is drawing on existing resources like the Toolkit and assisting institutions with implementation.</p> <p>Charter recommendations around student briefings will be to include all forms of GBV. Training should be inclusive of all forms of GBV as we know the lines are blurred between what some young people see as 'normal' and what's actually 'abusive' - again, this is where working with experts in various fields adds value.</p>
<p>Colleagues are concerned about the admissions and employment side of the Charter and stated that the collection of criminal convictions is a very complex issue</p>	<p>EmilyTest raised this issue following on from the UCAS announcement to stop collection of criminal convictions. We presented our concerns to Universities Scotland and the Scottish Government, supported by Scottish Women's Aid and Rape Crisis Scotland.</p> <p>Universities Scotland and UUK agreed it was important to collect this information and that it should be done on a local level rather than a national level. Institutions should therefore be collecting this information. This will be a requirement of the Charter and will remain unchanged.</p>

<p>Colleagues state that the convictions issue is mandated by UCAS and not something institutions can do unilaterally without legal basis</p>	<p>See above.</p> <p>Furthermore, EmilyTest has engaged with the Information Commissioner's Office (ICO).</p> <p>As long as it's shown to be relevant, proportionate and systems are secure then there is no barrier to doing this. If anyone has concerns, please feel free to contact us - contact details are at the bottom of this document.</p>
<p>Colleagues are curious about how institutions will police 'distance orders' and 'movement restrictions'</p>	<p>For institutions that have a security team, this recommendation will be linked up with that service.</p> <p>The distance orders and movement restrictions will take various forms - this could be barring a student card from allowing entrance to a building, moving a student to DV accommodation, moving students between tutorials, information sharing with staff such as bartenders and teachers. Interestingly, a lot of this work in this area already exists on an 'informal' basis - the Charter is attempting to formalise this as an official option for students.</p> <p>However, as with bail conditions and restraining orders, it often falls on the victim/survivor to police the behaviour of the perpetrator and to be on 'high alert'. Unfortunately, as our research detailed, this often leads to the victim/survivor leaving their location and/or studies.</p>
<p>Colleagues mention that Female Genital Mutilation (FGM) and honour-based violence require specialist support and input</p>	<p>EmilyTest has an inclusive approach to all forms of GBV. Stickers and support cards signpost to specialist agencies (and can be COVID-adapted as the Charter rolls out).</p>

	<p>We do recognise that institutions are under immense pressure to be ‘experts in everything’ and to take action in numerous areas to meet the needs of their diverse student bodies.</p> <p>The Charter will enhance recommendations around FGM and honour-based violence in student briefings and GBV policies. However, we recognise that FGM and honour-based violence disclosures will mostly trigger safeguarding and signposting processes rather than in-house reporting due to the specialist support needed, and perpetrators not necessarily being based at the institution.</p>
<p>Colleagues are unsure what is meant by ‘interim intervention action’</p>	<p>Whilst a report is being processed, students can request measures to protect their safety and wellbeing. This could include: interruption of study, moving students between classrooms, moving accommodation or offer of counselling. This recommendation refers to giving room for institutions to commence their case management process whilst ensuring everyone safe meantime.</p> <p>We agree that the Charter needs to be enhanced around how it will give consideration to all parties, ensuring safety for the reporting student, reported student and extended community.</p>
<p>Colleagues asked whether PhD students get to choose whether they identify as a staff member or student: “this distinction obviously has big implications”</p>	<p>It varies across institutions whether PhD students are considered as staff, students or both.</p> <p>However, in relation to the Charter, this entirely depends on where misconduct occurred - in their role as a researcher on</p>

	<p>fieldwork, in a teaching capacity, or in a classroom receiving education. This should shape whether an HR or student misconduct process is followed.</p>
<p>Colleagues in rural and remote Scotland shared concern about local SARC's - there are none local to Shetland, Dumfries or Isle of Lewis for example.</p>	<p>This is a valid point and concern. Scotland is currently implementing a programme to have a SARC in the majority of large cities in Scotland. EmilyTest will work with every institution to help them connect with the service local to them and to develop the most effective and efficient ways of engaging their support. Where a local SARC isn't available, that will be taken into consideration and the nearest one contacted.</p>
<p>Colleagues ask how an institution would manage policies concerning off-campus life and private student housing</p>	<p>The Charter will revise recommendations in this area to involve working in collaboration/partnership with private student housing - it is important to recognise that they do have a working relationship with universities and institutions do have a responsibility towards students placed in private accommodation if they are directing students there.</p> <p>EmilyTest and Universities Scotland worked with ASRA, a purpose-built student accommodation (PBSA) provider to implement the stickers that signpost to support. We continue to build relationships with other providers, ensuring consistency in approaches. Non-campus accommodation is more of a challenge - however, the Charter will focus on establishing minimum requirements.</p> <p>In regard to off-campus incidents, the Charter will ask institutions to specify in their policies and guidance to staff what to do if a student comes to them having</p>

	<p>experienced GBV off-campus, as policies and guidance do not currently have this information. This would likely involve support, signposting and data collection.</p>
<p>A safeguarding red flag system systems can be extremely expensive and may not be in the reach of all institutions</p>	<p>Agree - this was a recurring feedback point.</p> <p>A Red Flag IT system has long been campaigned for by EmilyTest, indeed an initial ask of the Scottish Government in 2017. Following a meeting with the Universities Minister in Westminster, EmilyTest are pleased to say UUK started work on development of a system for the HE sector. This work is ongoing and colleagues in the HE sector will shortly be invited to a webinar to introduce Scotland to this ongoing work. We will update colleagues as this progresses. EmilyTest is discussing use of this within FE setting, ensuring no-one is left behind.</p> <p>Queen Margaret University (QMU) has a cost-effective system in place 'Stay on Course', focusing on retention. Colleagues may wish to research their approach.</p>
<p>Some colleagues noted that according to HR policy, if a grievance is not upheld, material cannot be kept on file legally</p>	<p>We are hopeful the GDPR guidance being developed by UUK will offer clarity on this.</p> <p>We are considering holding a co-creation session or focus group for HR staff. The 1752 Group is also peer reviewing our research report and Charter - we will take this point to them.</p>
<p>Colleagues raised concern that the recommendation on the IT red flag system would not? be achievable for many institutions</p>	<p>We understand the challenges for many institutions. The Charter should act as a framework of flexible principles so this should be adaptable to all institutions. Please also refer to the previous point, we will update on progress and availability of this IT system when further updates are</p>

	<p>available.</p> <p>Institutions will also work with a dedicated member of EmilyTest staff so that they can adapt recommendations in ways that work for them.</p>
<p>Colleagues think that working with SARCs and the Police is desirable but relies on a lot of engagement. Not all areas have SARCs in place.</p>	<p>This will be clarified in the next revision of the Charter to state that if there is a local SARC then colleges and universities should familiarise themselves with the service and refer. Where this isn't possible (because of geographic positioning) then it wouldn't be a requirement, however we would expect them to familiarise themselves with a national contact number for SARCs. Furthermore, the SARCs programme is expanding and EmilyTest will update the Charter as appropriate.</p> <p>Where universities and colleges are struggling to make links with their local services, EmilyTest will assist in making and maintaining those connections through the new development manager post - the aim is for every institution to work with them to roll-out the Charter.</p>
<p>Colleagues say that the collection of criminal convictions (including historical questionnaires and appropriate partnerships) are already in place</p>	<p>The revised Charter will now focus on enhancing this and ensuring this data collection is used properly.</p> <p>This issue will be brought to the next round of co-creation sessions.</p>
<p>Colleagues think that the recommendation regarding GBV policies supporting investigations where the perpetrator(s) do not have student status is unclear.</p> <p>Colleagues are also concerned about the complexities of GBV policies covering exchange students and study abroad.</p>	<p>Agreed, we will address the wording. The Charter recognises that where perpetrators are not students/home students, institutions are limited in the action they can take. We will expand on this in the next draft.</p> <p>EmilyTest will meet with study abroad</p>

	<p>teams in Spring 2021 to explore the possibilities further. We take on board feedback that integrating exchange/study abroad issues into GBV policies should not be a bronze requirement.</p> <p>Please note that these recommendations aim to ensure incidents where non-students/students not from the institution are involved are in some way covered by GBV policies/student support - i.e., signposting will at least take place.</p>
<p>Colleagues point out that GBV policies cannot cover when students graduate</p>	<p>Reports should be dealt with in a timely way so that it does not 'get to this point' if possible.</p> <p>Furthermore, the Charter will outline the duties of care that institutions still have if perpetrator(s) have graduated - institutions should at least signpost victims/survivors to their options.</p>
<p>Colleagues think that the recommendation on the student-staff relationships policy is unclear.</p>	<p>EmilyTest takes the position that student-staff relationships should not be permitted because of the potential abuse of power and this should be reflected in policy.</p> <p>However, we think policies should state duties of care around offering support to students in this area. Furthermore, institutions need guidance on dealing with student-staff relationships if they are to be 'banned'.</p> <p>The 1752 Group are part of our peer review team, and we will be seeking their perspectives on this.</p>

Principle 5: Safe and Effective

GBV is seen as a core community issue and community responsibility. Universities and colleges' responses to GBV are driven by best outcomes. Preventative work is

undertaken as well as ‘response’ mechanisms. Students and staff are supported to continue their studies and work in ways that are safe for them. Responses are risk assessment-driven and emergencies are distinguished from lower-risk. Students can access support in timely ways. Professional practices and resources relating to GBV are non-judgmental and avoid ‘sex-shaming’ narratives. Staff, including posts like Resident Assistants (RAs), feel safe in their roles, only act within their remit, and are fully supported to escalate concerns.

<p>Colleagues would like clarification on what is meant by ‘best outcomes’ - for who? Victims, complainants, perpetrators, the university?</p>	<p>This refers to best outcomes for the reporting student, reported student, and the university community as a whole. This approach aligns with ESCU Toolkit and the current review of Pinsent Masons student misconduct guidance by Universities Scotland.</p> <p>A recurring concern in the sector is that institutions do not have enough guidance on how to deal with misconduct procedures - the Charter will synchronise with the next publication of guidance from Universities Scotland.</p> <p>We agree with recurring feedback that the Charter needs to be worded in a) plain English b) fully explain each principle and recommendation. The next version of our Charter will reflect this.</p>
<p>Colleagues asked what EmilyTest means by ‘triage counselling services’ – does this cover ‘everything’ or just GBV?</p>	<p>Evidence suggests counselling is often the ‘go to’ in response to disclosures of GBV, resulting in extensive waiting lists and a delay for victims/survivors reaching the specialist support they urgently need. Effective triaging would not only ensure victims/survivors reach vital support, but it would also reduce waiting overall.</p>
<p>Colleagues would like see revision of the recommendation relating to funding for prevention work “focused on the ends rather than the means”</p>	<p>We agree that this recommendation needs to be clarified.</p> <p>As mentioned, several times in this</p>

	<p>document, the challenge here is that there are currently no widely established methodologies to assess the impact and effectiveness of measures like prevention campaigns. This is something EmilyTest would like to focus on establishing.</p>
<p>Colleagues are interested in how the Charter can deal with more ‘serious’ levels of GBV, such as rape, and also deal with ‘lower’ levels such as sexist humour and catcalling</p> <p>GBV policies should also cover all types of inappropriate behaviour including verbal and non-verbal communication, online communication, physical contact and coercive/controlling behaviour between students, as well as between students and staff.</p>	<p>The Charter will recommend that student briefings, staff training, and GBV policies should recognise that all of these behaviours constitute GBV and are part of a continuum. Student briefings and awareness campaigns should include focus on ‘rape culture’, which demonstrates how the ‘low levels’ legitimise, reinforce and lead to ‘higher levels’. These efforts should be focused on students and staff of all genders, as evidence shows that they all participate in it.</p> <p>The ESCU Toolkit references the pyramid of escalation, a helpful tool to understand the continuum of abuse.</p> <p>Something to bear in mind is that different institutions are more likely to see some forms of GBV over others because of their differing demographics and because some forms are more likely to be reported over others.</p> <p>Pinsent Masons offers some guidance on sanctions and we will align the Charter with this.</p>
<p>Colleagues asked: how can the Charter deal with repeat offenders or patterns of GBV behaviour?</p>	<p>This is a great point of feedback - we will consider how students and staff can inform the institution about patterns without triggering a formal reporting process.</p> <p>We also hope the Charter will ensure a</p>

	<p>clear code of conduct and impose appropriate sanctions should this be breached. Our position is that there are no 'grey areas': no abuse should be tolerated, and every student and staff member should be living, working and studying free from the harms and threats of GBV. Inaction is not an option.</p> <p>Interestingly, our own research and the PhD project of EmilyTest's researcher, Poppy, finds there are many examples of 'informal' mechanisms already being put in place to respond to this problem, such as Student Union/Association security staff 'looking out' for certain people; students disclosing to staff they trust that they want to be seated away from someone; women keeping other women colleagues away from a perpetrator at social events; and LGBTQIA* and BAME students 'spreading the word' about homophobic, transphobic, sexist and racist perpetrators through social media and peer support mechanisms. Students and staff often 'club together' to protect others from perpetrators - many of these cases never 'see the light of day' within institutions because evidence suggests that students/staff from marginalised groups often trust informal mechanisms over 'formal'.</p>
<p>Colleagues would like clarification about the Risk Assessment tool</p>	<p>This refers to a GBV risk assessment tool, which EmilyTest is designing following on from a focus group with students and input from GBV/VAW professionals.</p> <p>The ESCU Toolkit currently refers to DASH risk assessment, which is a comprehensive, evidence-based risk assessment for trained practitioners. In the FE and HE context however, we</p>

	<p>acknowledge first responders are not professionals in GBV. Therefore, we deem it potentially dangerous to ask a staff member to complete DASH unless they are trained. The EmilyTest risk assessment takes vicarious trauma into account and is for use by lay users and ‘the untrained eye’. We look forward to introducing this to the sector once final testing by relevant stakeholders concludes.</p>
<p>Colleagues reported feeling uneasy about informing the student body if an incident occurs - this may be appropriate in some but not all circumstances</p>	<p>Agreed - this can also place burden on women students to police their environment and be on ‘high alert’. We will revisit this recommendation to see how the Charter can advise institutions on how to combat and employ non-victim blaming language and assess when it is appropriate to raise awareness of a local issue to the student and/or staff body. There also needs to be guidance on how this can be victim-led.</p>
<p>Colleagues are concerned about the parent/guardian/safe person contact consent forms</p>	<p>We acknowledge that for many students, ‘home’ may not be a safe place and that contacting family may put them in further harm - this is why they can choose a ‘safe person’ instead of a parent or guardian. The student will be asked a series of questions before they give this person’s details.</p> <p>EmilyTest maintains the view, in line with the NHS, that confidentiality can be broken when someone is at significant risk of harm to themselves and/or others. Colleagues may find this guidance helpful: https://www.google.com/url?q=https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/271792/Consensus_statement_on_information_sharing.pdf&sa=D&ust=1610489410289000&usg=AOvVaw1uYSjvebmQlyLMf</p>

	<p><u>X_v6qzv</u></p> <p>Finally, we continue to work closely with the University of Bristol, who have developed and adopted this approach. This is another good example of the importance of sharing of good practice.</p>
<p>Colleagues would like clarification on what is meant by ‘security measures’</p>	<p>This refers to victims/survivors being housed in appropriate accommodation after disclosing historical or current GBV - stalking victims/survivors have reported being housed in inappropriate flats (for example, ground floor flats on street level).</p>
<p>Dedicated emergency accommodation may be difficult for smaller institutions</p>	<p>Agreed - we will revisit this recommendation. The Charter will be flexible in working with the resources available to individual universities and colleges.</p>
<p>Colleagues would like clarification about how the Charter can cover accommodation not owned, or co-owned, by the institution</p>	<p>Institutions often have a working relationship with co-owned and private student accommodation. Student Associations/Unions often have a housing function with private landlord partnerships. This recommendation will not be able to cover all the places that students live but will be able to utilise some channels.</p> <p>This recommendation will be refined.</p>
<p>Colleagues had questions about the Police Scotland Intelligence Portal - some mentioned that they were aware of plans for this but have lost sight of where this has got to.</p> <p>Colleagues also said that it is unclear, as currently drafted, what this Charter recommendations specifically means.</p>	<p>An intelligence portal is being developed with Police Scotland and being piloted in the University of the Highlands and Islands.</p> <p>It's a system where universities and colleges will be able to share any intelligence they have in relation to potential criminality on campus (not restricted to GBV).</p> <p>This pilot has been paused due to COVID-</p>

	<p>19 but any further advancements will be communicated to the sector. Of course, this recommendation would only be included once the system is ready to be rolled out nationwide.</p>
<p>Colleagues are concerned that the elimination of counselling waiting lists is a complex and unrealistic recommendation.</p>	<p>If robust triaging takes place, waiting lists can be dramatically reduced. There are other successful approaches across the sector. For example, the University of Aberdeen has recently eradicated their waiting list. We are happy to connect colleagues with the project coordinator. Again, examples like these are where annual conferences are an excellent platform for sharing good practice.</p> <p>We are currently looking into the different models across universities and colleges in Scotland.</p> <p>We will reword this recommendation to a more flexible, principle-led one, such as 'taking action to enhance counselling services through x, y and z'</p>
<p>Colleagues are concerned that placing timeframes on GBV reports is ignoring external factors (for example, the impact of the Police and court process, if applicable) and is unrealistic concerning workloads and resourcing</p>	<p>We agree that this recommendation needs to be reworded to reflect external factors.</p> <p>However, it is helpful for victims/survivors to be kept informed of response timeframes, this is part of taking a trauma informed approach so this recommendation will remain.</p>
<p>In regard to policies on informing the student body if a local incident occurs - colleagues stated that this is not inclusive of rural and remote institutions. Colleagues also felt that this was generally unclear in terms of purpose.</p>	<p>This is to reiterate what many institutions are already doing - sending out communications if there is an ongoing or recurrent concern about a location, venue, individual, or trend. However, we would like to see guidance issued to institutions on the language employed as some staff, students and parents/guardians have</p>

	<p>reported that communications can sometimes be victim-blaming by placing the burden of responsibility on the student body to 'police' their behaviour and community.</p> <p>However, we agree this recommendation needs to be amended to be inclusive of all institutions.</p>
<p>Colleagues highlighted that funding for prevention work, including myth-busting campaigns, should be made more effective by employing a national approach over individual efforts.</p>	<p>Agreed - a consistent, national approach is advocated by EmilyTest and indeed hopefully the charter will contribute to this. By working together, we can ensure consistent language, similar reporting pathways and a general understanding of the behaviour that is unacceptable within Scottish institutions. For example, we have championed the Erase the Grey campaign which is freely available to all universities and colleges across Scotland. We are very keen for the Charter to promote collaborative approaches over siloed.</p> <p>We will amend accordingly.</p>

Sign up to co-creation sessions 2021!

In response to feedback, EmilyTest are running a second round of online co-creation sessions for FE and HE staff in February 2021.

The Charter research report will be sent at least one week in advance to Eventbrite sign-ups (alongside the access links for the sessions). This is in response to feedback that professionals want to get insight into the research process behind the Charter before contributing further to the Charter creation.

Please sign up to the next round of co-creation sessions using the links below. We will also circulate these links on Facebook, Twitter and via email in January and February 2021. If you cannot attend of these dates*, please let us know: pgerrard@ed.ac.uk

***Please note that the co-creation session dates below are provisional and may be moved back because of the professional impacts of caregiving responsibilities during the COVID-19 pandemic. Any changes will be communicated to Eventbrite attendees at least 5 working days in advance.**

The following sessions are for HE staff only:

Wednesday 24th February 13.00 - 15.00:

<https://www.eventbrite.co.uk/e/133107822079>

Thursday 25th February 16.00 - 18.00:

<https://www.eventbrite.co.uk/e/133108522173>

We ask that FE staff fill out a Doodle poll so that we can scope out best times for FE staff. We will then circulate event details for FE sessions as soon as possible:

https://doodle.com/poll/9fikn7845s73kfv3?utm_source=poll&utm_medium=link

If anyone has any questions in relation to these sessions, or filling out the Doodle poll, please do not hesitate to contact us pgerrard@ed.ac.uk

Timeline

December 2020	January 2021	February 2021	March 2021
Feedback response document in progress	Feedback response document released Research report sent to peer review team Further meetings with	Research report returned to EmilyTest from peer review Call-out for applications from colleges and universities to apply	New Charter development manager starts post at EmilyTest Pilots in one FE and one HE institution begin

	professionals/organisations to gather input, such as the NHS and study abroad teams Promote second round of co-creation sessions	to be pilot Charter institutions Second round of co-creation sessions with FE and HE professionals	
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Contact us

If you have any questions about the Charter funding, pilot or the EmilyTest charity, contact Fiona Drouet:
fiona.drouet@emilytest.co.uk

If you have any questions about this document, attending the further co-creation sessions or the research behind the Charter, contact Poppy Gerrard-Abbott:
pgerrard@ed.ac.uk

