

Tackling violence against women, domestic abuse and sexual violence in higher education

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To: Heads of higher education institutions in Wales

Respond by: Friday 7 March 2025

More information:

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Introduction

1. This publication provides information and requests updates from universities on their actions to tackle violence against women, domestic abuse, and sexual violence (VAWDASV) in higher education, including as such behaviours relate to people regardless of how they identify.
2. Though this publication is primarily intended for universities, other tertiary education providers may find it useful in reviewing their own work on VAWDASV and identity-based violence, harassment and abuse.
3. This is Medr's first publication on VAWDASV. This publication should be read in conjunction with HEFCW circulars [W20/39HE: Tackling violence against women, domestic abuse and sexual violence in HE](#) published in November 2020, and [W23/29HE: Tackling violence against women, domestic abuse and sexual violence in higher education](#), published in November 2023.
4. Our impact assessments informing the above circulars have shown women are more likely to experience domestic abuse and sexual violence, therefore, we have framed this information in terms of VAWDASV. There will be practice and learning that will inform actions to tackle violence, abuse, and harassment regardless of how a person expresses their identity, and this information takes account of this.
5. In February 2024, HEFCW provided universities with feedback on the information they provided in response to circular [W23/29HE](#). In this publication, we are continuing our focus on safe and inclusive higher education, seeking assurance of universities' progress towards addressing feedback from previous submissions and their continued work towards strengthening related policies and procedures in 2024/25.
6. At the time of writing, Medr is consulting on its first [Strategic Plan](#). The proposed plan outlines Medr's high-level vision for the Welsh tertiary education system, as well as highlighting eight long-term ambitions, two of which are a '*greater focus on learner engagement and wellbeing*', and '*better learner outcomes and improved learner experiences*'. The proposed plan additionally highlights Medr's five strategic aims, the first of which is '*to focus the tertiary sector around the needs of the learner – their experience, achievement and well-being, ensuring they are involved in decision-making and encouraging participation in learning at all stages in life.*' Medr's Strategic Plan will be presented to Welsh Government on 15 December 2024.

Medr's duties and responsibilities

7. Medr, the Commission for Tertiary Education and Research, became operational on 1 August 2024 after the closure of the Higher Education Funding Council for Wales (HEFCW) on 31 July 2024.
8. There are specific duties on public sector organisations in Wales, including Medr, under the Public Sector Equality Duty (Wales). Medr has a duty to promote equality of opportunity, as well as to:
 - i) identify and collect relevant information about equality;

- ii) revise and publish outcome focused equality objectives;
 - iii) identify and collect information about differences in pay;
 - iv) train staff and collect employment information;
 - v) revise and publish a [strategic equality plan](#);
 - vi) involve people who represent one or more of the protected groups and who have an interest in the way Medr carries out its functions;
 - vii) consider the general duty in procurement processes;
 - viii) produce an annual report each year; and
 - ix) publish accessible documentation.
9. Medr has a strategic duty to promote equality of opportunity in tertiary education and will introduce a staff and student/learner well-being related condition of registration. Paragraph 3.142 of the [Tertiary Education and Research \(Wales\) Bill: Exploratory Memorandum](#) notes: *“The initial and ongoing conditions regarding support for and the promotion of student and staff welfare will introduce new regulatory requirements for providers which, it was envisaged, would encompass matters such as mental health, wellbeing and safety of learners and staff at the provider. The Commission will be required to set out and publish requirements which must be met by registered providers regarding their arrangements in respect to the initial and ongoing conditions. In the context of student and staff welfare, it is envisaged that ‘arrangements’ would include policies, procedures and support services for student and staff wellbeing and safety. ‘Wellbeing’ in this context is intended to mean emotional wellbeing and mental health. ‘Safety’ is intended to mean freedom from harms including harassment, misconduct, violence (including sexual violence), and hate crime.”* We will consult on the new registration process.
10. The [Violence against Women, Domestic Abuse and Sexual Violence \(Wales\) Act 2015](#) outlines a duty on Medr (*‘the Commission’*) to *“issue guidance to governing bodies of institutions in Wales within the higher education sector on how the bodies may contribute to the pursuit of the purpose of [the] act.”* As Medr develops its functions and regulatory tools, we will provide further information.
11. Preventative approaches to tackling VAWDASV contribute to the ways of working outlined within the [Well-Being of Future Generations \(Wales\) Act 2015](#), and are supported and informed by relevant legislation and Welsh Government priorities including [Welsh Government’s VAWDASV Strategy 2022-2026](#), and by the [Equality Act 2010](#).

Background and context

12. This publication and request for information:
- takes account of [Welsh Government’s 2022-26 VAWDASV strategy and blueprint](#);
 - contributes to higher education providers’ ongoing strategic equality duties, and monitors progress against objectives within institutional (including Strategic Equality Plans) and national strategies;

- is informed by the [Universities UK](#)'s six publications¹ in the Changing the Culture series; and
 - takes account of Estyn's [report](#) on peer-on-peer sexual harassment among 16–18-year-old learners in further education.
13. In 2015, Public Health England published '[Strategy for Addressing Sexual and Domestic Violence in Universities: Prevention and Response](#)', developed as part of a Welsh Government funded bystander programme. The resource summarises strategic approaches to tackle VAWDASV, with a particular emphasis on student- and learner-informed aspects of work.
 14. In 2016, the United Nations organisation, UN Women, published a [blueprint](#) for addressing campus violence. This highlights four key principles² to create a safe living and learning environment on campus, and ensure that survivors receive the right support whilst perpetrators are held to account for their actions. The ten 'essentials' for addressing campus violence cover institutional environment, services offered, and prevention of VAWDASV.
 15. In 2018, UN Women further published a [guidance note](#) relating to on-campus violence prevention and response. This produced a series of ten recommendations for institutions, encouraging universities to:
 - i) assess the situation;
 - ii) put a policy in place;
 - iii) assign a dedicated university coordinator to address violence against women;
 - iv) put in place protocols that outline the procedures;
 - v) consider interim and supportive measures;
 - vi) consider monitoring and evaluation mechanisms;
 - vii) have a dedicated budget;
 - viii) consider provision of essential services;
 - ix) consider awareness raising and bystander programmes; and
 - x) promote respectful relationships and challenge harmful masculinities.
 16. The above reports remain relevant, despite their publication dates. The UN Women report makes several references to the importance of staff and student awareness raising, and bystander intervention training. A report, '[Findings from a National Study to Investigate How British Universities are Challenging Sexual Violence and Harassment on Campus](#)' (Donovan, Bracewell, Chantler and Fenton), published in 2020, highlights the challenges of voluntary training provision, including the student gender bias often identified in those attending; "*A key concern about prevention activities remaining voluntary is the gender bias identified by respondents in those who attend, i.e. that it is female students in certain areas who are more likely to attend.*" As a result of this, providers should consider the appropriateness of mandatory or voluntary training against transparent criteria, and review the diversity of attendees to ensure it is promoted to, and engages, the full diversity of the staff and student population.

¹ [Changing the culture 2016](#); [Changing the culture: directory of case studies 2017](#); [Changing the culture: one year on 2018](#); [Changing the culture: two years on 2019](#); [Changing the culture: tackling staff-to-student sexual misconduct 2022](#); [Changing the culture: sharing personal data in harassment cases 2022](#).

² The four principles outlined are a comprehensive approach, a survivor-centred approach, a human rights-based approach and an approach that centres accountability.

17. In July 2022, ACE Hub Wales and Traumatic Stress Wales published the [Trauma Informed Wales Framework](#), outlining a '*societal approach to understanding, preventing and supporting the impacts of trauma and adversity*'. The framework's target audience is those responsible for making trauma-informed policy and developing trauma-informed organisations and services and, therefore, it is relevant to tertiary education. Trauma-informed approaches to higher education were explored more recently in a [blog](#) by the Higher Education Policy Institute (HEPI). Universities have identified trauma-informed practice as a key area for further development and information. Medr will collect and share practice, gather resources to be shared and publish information for the tertiary sector to support enhanced practice.
18. Welsh Government's '[Sound](#)' initiative, launched in 2023, encourages men aged 18-34 in Wales to consider issues related to gender-based violence, through discussion with peers, the provision of trusted advice, and becoming active bystanders in their peer groups. The [webpages](#), [Instagram](#), [TikTok](#) and [YouTube](#), provide sound bites of content for young people, with a view to change the culture and promote healthy relationships, consent, and identify ingrained behaviours that are unhealthy. This, and other resources included in Annex B of [W23/29HE](#), may be useful to education providers in ongoing conversations about VAWDASV with a wider audience.
19. Of universities' Strategic Equality Plans covering 2024 to 2028, seven make direct reference to VAWDASV, gender-based violence, or sexual misconduct. VAWDASV has implications for well-being and health, including the mental health of staff and students. It has further implications for intersectionality and trauma informed considerations, as well as anti-racism, including Nation of Sanctuary and University of Sanctuary commitments.
20. Medr is a member of the Welsh Government's VAWDASV blueprint work stream on public spaces³. We continue to work with Welsh Government and other partners to inform our understanding of this policy area following our transition into Medr, and as we operate within a tertiary context.

What has changed since HEFCW's last circular?

21. Since the last information issued by HEFCW, new reports and resources have been published. This publication takes account of these, including as they respond to the lasting impact of the COVID-19 pandemic on staff and students. We encourage universities to take account of their findings, recommendations, and practice. A list of further resources can be found in Annex B of HEFCW circular [W23/29HE](#).
22. In January 2024, the Welsh Government published its [action plan](#) on peer-on-peer sexual harassment in education settings. The plan takes account of the [Everyone's Invited](#) platform findings, the Senedd Children, Young People and Education (CYPE) committee inquiry into [peer-on-peer sexual harassment among learners](#), and Estyn's thematic report on [peer-on-peer sexual harassment among 16 to 18-](#)

³ Welsh Government's blueprint is being informed by six work streams: sustainable whole approach system; needs of children and young people; needs of older people; tackling perpetration; work place harassment; gender based harassment in public spaces.

[year-old learners in further education](#). The action plan sets out seven priority areas for action, which are:

- i) prevention;
- ii) early intervention;
- iii) learner support and wellbeing;
- iv) professional learning and leadership;
- v) parents, carers, and the community;
- vi) addressing sexual harassment in the online context; and
- vii) research and evaluation.

23. Whilst this action plan is for schools and colleges, many elements of it can inform practice and processes within higher education and could be used as a baseline against which to assess provision. Medr will provide new opportunities to share relevant learning across different strands of the tertiary education system, as was requested by universities in responses to [W23/29HE](#).
24. In January 2024, the Senedd's Equality and Social Justice Committee published '[How we must all play our part: a public health approach to halting the epidemic in gender-based violence](#)'. Action 5 of the report, in relation to higher education, states that Medr should '*work with universities to agree actions which strengthen preventative approaches across the sector*'. The report further highlights the need to apply consideration to migrant people with experience of VAWDASV, particularly those with no recourse to public funds (NRPF), which includes many international students.
25. In April 2024, the [1752 Group](#), a research and campaign organisation working to address staff sexual misconduct in higher education, published '[Self-Assessment and Strategic Planning Tool: Sexual Violence, Harassment & Misconduct \(SVHM\) in Higher Education](#)', designed to support higher education institutions to reflect on progress, identify further targets, and map deliverables in this area. This and other toolkits, including '[#CombatMisconduct](#)', published in 2021, by AVA (Against Violence & Abuse), National Union of Students UK and Universities UK, may be used in supporting universities to make progress against objectives laid out in Strategic Equality Plans and they will be of interest to other higher education providers.
26. In June 2024, Welsh Government's National Advisers on VAWDASV published an [action plan for 2024 to 2025](#), outlining the actions that will be taken to prevent violence and to support and protect people who have experienced violence. In line with Welsh Government's [VAWDASV Strategy 2022-2026](#), the high-level aim is '*to work with all stakeholders in Wales to improve understanding of and response to presentations of VAWDASV within their services and to enhance the pathways of support for survivors in a collaborative whole system approach*'.
27. In September 2024, Wales Without Violence published their [Engaging Men and Boys In Violence Prevention toolkit](#), containing research reports and infographics to support organisations in engaging men and boys in violence prevention. This includes a report on key findings from '[Test and Learn](#)' projects across Wales, and a [Wales-wide review](#) of programmes.
28. The new [Worker Protection \(Amendment of Equality Act 2010\) Act 2023](#) came in to force on 26 October 2024. This introduces a positive legal obligation on employers

to take reasonable steps to protect their workers from sexual harassment. The Equality and Human Rights Commission (EHRC) has updated its previous [guidance](#) to include information on the new preventative duty so that employers understand their obligations under equality law.

Reviewing progress and tackling violence against women, abuse and sexual violence in higher education and sharing practice

29. Universities identified several areas where they would welcome further VAWDASV information. We have taken note of these, and will consider further how we can best respond to them, including by taking a tertiary 'whole sector' approach.
30. In line with the Equality and Social Justice Committee's [expectations](#) for Medr to work with providers to strengthen preventative approaches, and the National Coordinators' commitment to improving awareness and responses to VAWDASV in Wales, we are asking universities to provide us with information as part of our ongoing monitoring and assurance processes. This information will inform our understanding of the level of ambition and pace, and the progress being made in tackling VAWDASV and gender-based violence, abuse, and harassment in higher education. We will use this information to:
 - i) inform our understanding of universities' priorities for the academic year 2024/25, particularly where this relates to the feedback previously provided by HEFCW;
 - ii) evidence progress towards securing safe and inclusive higher education;
 - iii) share interesting practice;
 - iv) report to Welsh Government on higher education's contribution to the Violence Against Women strategy and blueprint; and
 - v) inform our policy and registration developments.
31. We set out our reporting requirements at **Annex A**.
32. If there is specific information you will provide to us that you wish us not to share more widely, please let us know. Please only provide information about services or activities and not individual cases.

Timetable

33. Please send your responses to Orla Tarn (orla.tarn@medr.cymru) by **Friday 7 March 2025**.

Assessing the impact of our policies

34. We have carried out an impact assessment screening to help safeguard against discrimination and promote equality. We anticipate a positive impact on sex, age, disability, gender reassignment, race, religion, sexual orientation and marriage and civil partnership. We have assessed the impacts on socio-economic characteristics

and anticipate a positive impact on communities of interest⁴ and communities of place⁵.

35. We have considered the impact of policies on the Welsh language, and Welsh language provision in higher education and potential contribution to the goals set out in the Well-Being of Future Generations (Wales) Act 2015. Contact ryan.stokes@medr.cymru for more information about impact assessments.

Further information

36. For further information, contact Orla Tarn (orla.tarn@medr.cymru).

⁴ Communities of interest are those who share an identity, e.g. lone parents, carers; those who share one or more protected characteristic, e.g. LGBTQ+, older people; groups of people who have shared an experience, e.g. homelessness, the same local health/social care system or local service.

⁵ Communities of place are those who share a geographical location, e.g. Wales Index of Multiple Deprivation (WIMD).

Medr

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