HEA | An tÚdarás um Ard-Oideachas
The Higher Education Authority

Report of the Expert Group

Ending Sexual Violence and Harassment Framework

November 2025

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Chair's Foreword

In recent years there has been increasing recognition of the importance of a public health model of prevention and response to gender-based violence (GBV) in which *all* institutions in society need to play a role. This means that rather than GBV – including sexual violence and harassment (SVH) - being solely or even primarily the responsibility of the criminal justice system; education institutions, workplaces, and civil society organisations have a responsibility to address this issue. This is the only way in which this enormous public health challenge can even begin to be effectively addressed. While this is a major shift, it is a necessary one; criminal justice processes are not accessible or appropriate for all SVH experiences, and those targeted for such behaviours have a right to safety in work and study regardless of whether they can, or wish to, report a criminal offence.

Nevertheless, the scale of the challenge is daunting. For higher education institutions (HEIs), it is particularly stark, given the high prevalence of GBV among young people, including students. It can be helpful to recognise the seismic and indeed historic nature of this shift in addressing SVH within higher education. If this work *seems* challenging, it is because it *is* challenging; because often it has not been done before, and we do not always know how to go about it.

Within the context of this historic shift, one of the greatest resources of the Irish higher education sector is its collaborative approach to this work. Compared to some other jurisdictions where HEIs' work is siloed, in Ireland there exist structures for collaboration, where resources can be developed jointly and shared. This avoids some of the problems associated with competitive, uneven and disjointed approaches that are occurring elsewhere. The strength of this collaborative work should not be underestimated, and the work of the Higher Education Authority (HEA) in facilitating and supporting it is crucial.

Throughout the lifetime of the next Framework, for which the Expert Group has made recommendations below, the work to shift towards creating safer, more equal HEIs will continue to be a work in progress. I hope that the spirit of learning and developing together as a sector will continue to be a hallmark of Ireland's groundbreaking work in this area.

On behalf of the Expert Group, I would like to thank staff at the HEA for their extensive support during this review, as well as all stakeholders who participated in consultations, and expert reviewers Orla O'Connor, Clarissa DiSantis and Gemma Irvine who reviewed a draft version.

Dr Anna Bull

Executive Summary

Safe, Respectful, Supportive and Positive: Ending Sexual Violence and Harassment in Irish Higher Education Institutions, often referred to as the 'Ending Sexual Violence and Harassment Framework' or 'Consent Framework' (the 2019 Framework) was published by the Government in 2019. Since the publication of the 2019 Framework, national surveys of student and staff experiences of sexual violence and harassment were conducted in 2021 and the results of these surveys provided a basis for the *HEA Ending Sexual Violence and Harassment in Higher Education Implementation Plan* which was published in 2022. This Expert Group report makes recommendations for a revised Framework, informed by the progress made by Irish higher education institutions in their work to end sexual violence and harassment since 2019 and the challenges that remain.

Through a consultation process with key stakeholders, the Expert Group has identified thematic areas in relation to ending sexual violence and harassment for all staff and students in Irish higher education. Building on the pillars identified in the 2019 Framework, recommendations have been made across four areas; Effective Structures and Roles in Place, Recording of Incidents and Transparent Data Reporting, Institutional Policies and Procedures and Targeted Training and Awareness-Raising Initiatives. Within these areas, the Expert Group has revised the outcomes identified within the 2019 Framework to outline twelve outcomes to be achieved by higher education institutions in a revised Framework. In five specific areas related to these outcomes, the Expert Group has also suggested priority areas for sectoral action to address ending sexual violence and harassment in higher education, for consideration by the HEA.

Introduction to the Ending Sexual Violence and Harassment Framework

The HEA is committed to supporting HEIs to ensure a national institutional campus culture which is safe, respectful and supportive, and clear in the condemnation of unwanted and unacceptable behaviours. Preventing and responding to all forms of sexual harassment and sexual violence in Irish higher education, is essential to ensuring a safe environment for all students and staff.[1]

The HEA Centre of Excellence for Equality, Diversity and Inclusion supports and oversees the implementation of *Safe, Respectful, Supportive and Positive: Ending Sexual Violence and Harassment in Irish Higher Education Institutions*, which was published by the government in April 2019, and is often referred to as 'the Framework for Consent in Higher Education (the 2019 Framework)'.[2] The 2019 Framework provides as follows:

"Our vision is to ensure an institutional campus culture which is safe, respectful and supportive. Institutions have a duty of care to their students and staff, and a responsibility to foster a campus culture that is clear in the condemnation of unwanted and unacceptable behaviours. The higher education student experience is not only concerned with the pursuit of academic excellence, but also to prepare students to engage with and make positive contributions to society. Creating a positive student experience empowers individuals to foster a culture of respect, dignity and integrity."[3]

The 2019 Framework includes fifteen key outcomes which are clustered into four thematic areas focusing on: Institutional Culture, Institutional Processes, Institutional Policies and Targeted Initiatives. HEIs are required to report to the HEA on an annual basis on their progress in implementing the 2019 Framework.

In 2021, at the request of the then Minister for Further and Higher Education, Research, Innovation and Science, Simon Harris TD, HEIs developed Action Plans aimed at ending sexual violence and harassment. The Action Plans are published on each institution's website.

With the support of the HEA Advisory Group on Ending Sexual Violence and Sexual Harassment in HEIs,

[1] In co-operation with the criminal justice system as appropriate.
[2] Government of Ireland (2019), Safe, Respectful, Supportive and Positive: Ending Sexual Harassment in Irish Higher Education Institutions https://www.gov.ie/en/department-of-education/publications/framework-for-consent-in-higher-education-institutions-safe-respectful-supportive-and-positive-ending-sexual-violence-and-harassment-in-irish-higher-education-institutions/ [accessed 5 November 2025]
[3] 2019 Framework page 6

the *Ending Sexual Violence and Harassment in Higher Education, (the Implementation Plan)*[4] was developed to address the recommendations that emerged from an analysis of the findings of national surveys of staff and student experiences of sexual violence and harassment in HEIs which were conducted by the HEA in 2021. [5] The actions outlined in the Implementation Plan represent a comprehensive and ambitious response to the survey findings. The plan was formally launched in October 2022. The Implementation Plan is intended to build on and complement the broad range of initiatives ongoing across the sector towards the outcomes set out in the 2019 Framework and accompanying institutional action plans. The HEA Advisory Group on Ending Sexual Violence and Sexual Harassment in HEIs will monitor the progress of HEIs towards the delivery of the plan, in close collaboration with the HEA. The lifetime of the Implementation Plan was extended to the end of 2025.

The Expert Group's remit and terms of reference

2024 marked five years since the introduction of the 2019 Framework. In 2024, the HEA convened an Expert Group to conduct a review of the 2019 Framework beginning in 2025. The Terms of Reference of the Expert Group are provided in Appendix 1.

Membership of the group comprised Noeline Blackwell, Professor Fredrik Löfström Bondestam, Dr Anna Bull (chair) and Tony McMahon. Further information about the Expert Group is available in Appendix 2. The Expert Group agreed to undertake the review of the Framework having regard to:

- Relevant academic publications on the topic (e.g. relevant UniSAFE and GenderSAFE and GENDERACTIONplus project reports).
- Relevant national and European Commission policy related documents (e.g. Third National Strategy for DSGBV, EU Zero Tolerance Code of Conduct, Istanbul Convention).
- Sectoral Reports on HEI Progress against the Framework outcomes.
- Progress achieved in relation to the HEA ESVH Implementation Plan (2022-2025).
- Reports of the National Surveys of Staff and Student Experiences of Sexual Violence and Harassment in Irish HEIs.
- Other submissions and inputs received (e.g. written submissions).
- Meetings with stakeholders.

[4] HEA (2022), Ending Sexual Violence and Harassment in Higher Education Institutions Implementation Plan, 2022 – 2024 https://hea.ie/assets/uploads/2021/04/HEA_ESVH_Implementation_Plan_FINAL.pdf [accessed 5 November 2025]
[5] HEA (2021), National Survey of Staff and Students Experiences of Sexual Violence and Harassment in Irish HEIs https://hea.ie/policy/gender/national-survey-of-the-experiences-of-students-in-relation-to-sexual-violence-and-harassment/ [accessed 5 November 2025]

The Expert Group agreed to report to the HEA on its conclusions and, specifically:

- Make high-level recommendations as to how, in the view of the Expert Group, the existing 2019 Framework could be updated and renewed, while retaining the current focus on prevention and response.
- Review progress made in the sector since the introduction of the 2019 Framework and the Implementation Plan.
- Identify 3-5 priority areas for sectoral action to address Ending Sexual Violence and Harassment (ESVH) in higher education.

To support the work of the Expert Group, secretariat, briefing and desk-based research was provided by the HEA Centre of Excellence for EDI throughout the review process.

Consultations and evidence drawn on in the Review

Over the course of the review, the Expert Group met with several stakeholder groups to discuss progress made across the sector since the introduction of the 2019 Framework, and what items this review should focus on. The stakeholder consultations were attended by 3-4 members of the Expert Group, and 61 participants across 6 meetings. The HEA Centre of Excellence for EDI provided the secretariat. Attendees were provided with information on the background of the review, the review process and potential questions which the Expert Group may ask in advance of the meetings. Each stakeholder group was also given the opportunity to provide any further information to the Expert Group following the meeting via written submission. A summary can be found in Appendix 3.

The Expert Group invited representatives from the following stakeholders to attend consultation:

- HEI Sexual Violence Prevention and Response Managers
- HEA Advisory Group on Ending Sexual Violence and Harassment in Higher Education Institutions
- HEA National Committee for Equality, Diversity and Inclusion
- Student representatives
- Staff union representatives
- HEI human resources and employee relations representatives

A consultative meeting was held with the Department of Further and Higher Education, Research, Innovation and Science (DFHERIS) and Cuan, the national domestic, sexual and gender-based violence agency.

The Expert Group met six times from January to July 2025 to discuss the review process, national progress reports (and other relevant documentation), stakeholder consultations and the drafting of the final report.

European-level policy developments

Gender-based violence (GBV) in HEIs is receiving increasing interest and attention in research, policy, media and among other stakeholders.

The #MeToo movement, in its various national, local and occupational forms, has impacted awareness of GBV in HEIs, but the response has been uneven and has sometimes faced ignorance. Still, policy development to counter gender-based violence is increasing in the European Union (EU) and is more readily recognised as needing to be an integral part of equality, diversity and inclusion (EDI) policy and practice. Therefore, the Expert group has consulted the broader EU framework on ending GBV in the review process. This concerns the EU Gender Equality Strategy 2020-2025[6] and the outputs from three Horizon2020 projects on GBV (UniSAFE,[7] GENDERACTIONplus[8] and GenderSAFE[9]). Other important policy documents in the review process have been the 2021 Ljubljana Declaration on Gender Equality in Research and Innovation[10] and the 2022 Prague Call for Action to End Gender-Based Violence.[11] This broad policy framework enabled the development of the current European Research Area (ERA) Zero-Tolerance Code of Conduct: Counteracting gender-based violence, including sexual harassment, in the EU research and innovation system.[12] The three pillars of this Code of Conduct inspired the review process through enabling an understanding of the importance of a simultaneous commitment, action and accountability in ESVH in the Irish higher education context.

[6] European Commission (2020), EU Gender Equality Strategy 2020-2025 https://ec.europa.eu/newsroom/just/items/682425/en [accessed 5 November 2025]
[7] https://unisafe-gbv.eu/ [accessed 5 November 2025]
[8] https://genderaction.eu/ [accessed 5 November 2025]
[9] https://gendersafe.eu/ [accessed 5 November 2025]
[10] Council of the EU (2021) Virtual Conference "Deepening the ERA Through Gender Equality" (8-9 July 2021) and Ljubljana Declaration on Gender Equality in Research and Innovation, 12044/21. https://data.consilium.europa.eu/doc/document/ST-12044-2021-INIT/en/pdf [accessed 5 November 2025]
[11] Ministry of Education, Youth and Sports of the Czech Republic (2022), Working towards safe and respectful higher education and research for all – Call for action to end Gender Based Violence http://gbv2022.soc.cas.cz/wp-content/uploads/2022/11/Call-for-Action_GBV-2022_final.pdf [accessed 5 November 2025]
[12] European Commission (2024), Zero-tolerance code of conduct: Counteracting gender-based violence, including sexual harassment, in the EU research and innovation system https://data.europa.eu/doi/10.2777/044501 [accessed 5 November 2025]

National policy work on Gender-Based Violence

Subsequent to the launch of the 2019 Framework in HEIs, Ireland's Third National Strategy on Domestic, Sexual and Gender Based Violence was published by the Government in 2022 and aims to achieving a society free from DSGBV by 2026.[13]

The Strategy is based around the 4 pillars of the Istanbul Convention:[14]

1. Prevention;
2. Protection;
3. Prosecution; and
4. Policy Coordination.

Annual implementation plans have included actions for the higher education sector. A key action of this whole-of-government strategy was the establishment of Cuan in 2024 as a dedicated national agency to drive the implementation of this strategy.

[13] Government of Ireland (2022), Third National Strategy on Domestic, Sexual and Gender Based Violence https://www.gov.ie/en/department-of-justice-home-affairs-and-migration/publications/third-national-strategy-on-domestic-sexual-and-gender-based-violence/ [accessed 5 November 2025]
[14] Council of Europe (2011), Council of Europe Convention on preventing and combating violence against women and domestic violence https://rm.coe.int/168008482e [accessed 5 November 2025]

Recommendations for a revised Framework

Below, the Expert Group highlights the wider context of this work, as well as the positive progress that has already been made since 2019 in Ireland. The Expert Group then introduces the approach in the revised Framework, outlining key changes in the revised Framework as well as underpinning principles, before outlining each of the revised Framework outcomes in turn. In 'highlight boxes' throughout the report, the Expert Group considers further issues that are not explicitly linked to the revised Framework outcomes, but that the Expert Group wishes to highlight to the sector, to policymakers, and to those currently implementing the 2019 Framework.

The recommendations in this report build on those of previous national policy documents on ESVH in Irish higher education. The Expert Group endorses the approach set out in the 2019 Framework and the recommendations below build on this earlier approach. The Expert Group have outlined where the Group consider that work still needs to continue on the implementation of the 2019 recommendations.

Highlighting positive progress

Within this context, the progress made since 2019 is very notable. HEIs began reporting to the HEA on their progress in relation to ending sexual violence and harassment in 2020. National surveys of students and staff carried out by the HEA in 2021 as part of the Framework implementation noted that more than half of the 11,417 participants said they had experienced examples of sexual harassment.[15] That survey also identified that more than half of those surveyed had encountered messages around consent and/or SVH. In addition, about 10% of students, particularly first years, had already participated in some form of awareness raising around consent or bystander interventions. The rise in awareness of SVH as an issue in HEIs, as well as the willingness to report it – albeit anonymously - was a significant positive step forward in addressing a problem which was previously hidden.

The survey resulted in more accurate evidence bases than had existed before. In addition, the recommendations arising from it informed the development of a HEA Implementation Plan for 2022-2024, published in October 2022, and later extended to run until the end of 2025. This included an action to develop shared terminology and guidance in terms of what is reported and recorded at a HEI and national level.

By July 2021, all publicly funded HEIs had dedicated action plans in place aimed at ensuring the creation

[15] National Survey of Staff and Students Experiences of Sexual Violence and Harassment in Irish HEIs

of safe, respectful and supportive institutional campus cultures. Over the term of the 2019 Framework, policies and processes for addressing SVH have since been developed and updated by several HEIs. Resources were allocated by HEIs according to their individual action plans. To better ensure resources for prevention and response to SVH, Sexual Violence and Harassment Prevention and Response Manager posts were established in HEIs in receipt of core funding from the HEA and who have an oversight agreement with the HEA. This funding was announced by the Minister in October 2022 and HEIs began recruiting these roles in 2023.[16]

Education and awareness raising programmes for students have been rolled out in some institutions, particularly for students new to campus, and many HEIs have engaged in campus-wide awareness raising programmes. These programmes have covered such themes as consent, bystander awareness and how to respond to disclosures of SVH.[17] Through HEA funding, a confidential, anonymous reporting tool known as 'Speak Out' was developed by the Psychological Counsellors in Higher Education in Ireland (PCHEI) and adopted by many of the HEIs. Alongside this there is ongoing work on embedding ESVH within the curriculum.

The national policy has been supported by a dedicated Centre of Excellence for Equality, Diversity and Inclusion within the HEA as well as by a HEA Advisory Group on Ending Sexual Violence and Harassment in Higher Education Institutions, which comprises stakeholders from the institutions as well as other experts. HEIs provide an annual self-assessment of progress, and the HEA is now seeing upwards progress in the achievement and completion of framework outcomes.

While there is still a considerable distance to travel to achieve the achieve the safe, respectful, supportive and positive campuses envisaged in the national policy, thanks to the combined efforts of student, staff, institutions and State, significant progress has been made in addressing challenges that a decade ago were barely acknowledged or addressed.

Global context of EDI work

EDI work in global HEIs has developed during the past decades and is characterised by investments in

[16] Government of Ireland (2022), New higher education sexual violence and harassment implementation plan and additional funding announced by Minister Harris https://www.gov.ie/en/department-of-further-and-higher-education-research-innovation-and-science/press-releases/new-higher-education-sexual-violence-and-harassment-implementation-plan-and-additional-funding-announced-by-minister-harris/ [accessed 5 November 2025]

[17] By 'disclosure' the Expert Group mean a student or staff member telling anyone in their institution about incident(s) of SVH. This is distinct from a formal report, which refers to a student or staff member using the institution's policies to make a formal notification to the HEI, seeking action according to the relevant policy.

expert knowledge, strategic institutional framing and resourcing, as well as support and/or incentives from national stakeholders in many countries. At the same time, the EDI narrative and EDI work and workers are under attack in several ways. Democratic procedures and processes enabling EDI officers' commitment are being undermined in several regions. Neoliberal, internal academic processes are currently putting EDI work at risk within academic communities world-wide. There also exist organised, often populist as well as autocratic, forces actively limiting or even banning the existence of EDI as a specific field of interest in HEIs.

This is why the European Research Area (ERA) Zero-Tolerance Code of Conduct is an important hallmark for all Irish HEIs committed to the revised Framework. It is a clear, uncompromising statement on the importance of ending GBV through commitment, action and accountability (of institutions and perpetrators).[18] Extensive recent studies on the implementation of policies targeting GBV in ERA institutions indicate that progress has been slow and inconsistent. There is foremost a lack of comprehensive policies at the national and institutional levels in most EU Member States. GBV as a concept has only been addressed in a handful of national contexts, and activities and measures (at the institutional level) for ending GBV are still scarce and not systemic.[19] [20]

All in all, this demonstrates the impressive progress made in Irish HEIs since the 2019 Framework on ESVH was launched, but it also highlights the need to secure the future implementation of a revised Framework in the face of ongoing political and organisational changes in Ireland and beyond.

Expert Group approach to the revised Framework

The 2019 Framework provided a comprehensive, ambitious roadmap for the higher education sector to build structures for preventing and addressing SVH. In carrying out this review, it has been clear to the Expert Group that the 2019 Framework enabled the sector to set up firm foundations for this work. Therefore, the Expert Group propose to retain the four pillars of the 2019 Framework, with some shifts in focus, and updated outcomes.

Some of the outcomes from the 2019 Framework, such as those around establishing committees, developing policies, and building structures, have now been achieved or are close to being met across the sector. Others, particularly student and staff training, evaluating ESVH work, as well as reporting

[18] GENDERACTIONPlus (2025), Gender-Based Violence in the ERA: An endemic problem in need of a new cure https://genderaction.eu/wp-content/uploads/2024/10/GENDERACTIONplus_Position-Paper-5_Gender-based-violence-in-the-ERA.pdf [accessed 5 November 2025]
[19] Fajmonová, Veronika et al (2021), Unisafe D3.2 Report on the European Policy Baseline, https://zenodo.org/records/5780037 [accessed 5 November 2025]
[20] SWG GRI (2020), Sexual Harassment in the Research and Higher Education Sector: National Policies and Measures in EU Member States and Associated Countries https://data.consilium.europa.eu/doc/document/ST-1205-2020-REV-1/en/pdf [accessed 5 November 2025]

pathways, still need sustained and substantial work by HEIs in order to be fully effective and embedded.

As a result, the Expert Group considers the foundations of the 2019 Framework relating to prevention, particularly in relation to training and campaigns, to be in progress, albeit with uneven development across the sector particularly on evaluation. As a result, the Expert Group hopes that the ongoing work in this area will continue and have recommended only minor updates for these outcomes. The recommendations by the Expert Group aim to encourage and support the important and effective work that is currently ongoing across the sector in relation to prevention and training, and to underline the need for this work to continue.

During the review process, a number of thematic areas emerged which the Expert Group considered in the context of an updated and renewed Framework. These are discussed in further detail below.

Terminology

During the consultation, the Expert Group discussed with stakeholders the scope of the 2019 Framework in focusing on SVH (rather than, for example, GBV more broadly) and the adequacy of this terminology. The Expert Group concluded that the scope and terminology of SVH in the current Framework is essentially sufficient. The terminology is widely accepted and mirrors past and current developments in Irish HEIs. It is also evident from our consultations that SVH allows for including adjacent experiences of violence and abuse, such as stalking, online violence, and domestic abuse/coercive control. At the same time, it is important to acknowledge a future need to broaden the terminology. This is mainly due to developments in research, and in the EU, but also stems from developments in Irish higher education.

The Expert Group consultations with stakeholders identified a need to include further forms of violence in a revised framework. GBV was suggested unanimously in the consultations, albeit with some variations. This is because GBV constitutes a continuum, thus it is difficult to conceptualize different types of violence.[21] Discrimination, bullying, harassment and violence are not separate but interlinked phenomena. It is also important to understand the way inter-personal violence (IPV) and GBV often are interlinked, that is, experiences of SVH in HEIs are not isolated phenomena, they are interconnected with possible experiences of earlier or ongoing IPV.

[21] Kelly, L. (1987). The Continuum of Sexual Violence. In: Hanmer, J., Maynard, M. (eds) Women, Violence and Social Control. Explorations in Sociology. Palgrave Macmillan, London. https://link.springer.com/book/10.1007/978-1-349-18592-4 [accessed 5 November 2025]

The other argument for changing the terminology from SVH to GBV are the recent ERA and EU developments. As the ERA Zero-Tolerance Code of Conduct on GBV, adopted by the EC in 2024, states, GBV is a necessary shift in focus not to risk ignoring potential and actual forms of violations and abuse in HEIs. The ERA Code of Conduct also has an important argument concerning including not only other forms of violence outside of SVH (such as psychological, economic, organizational and other forms of violence) but also framing GBV as a concept acknowledging the inclusion of forms of violence as yet not named as violence.

However, for this revision of the 2019 Framework, the Expert Group recommends that the current terminology (SVH) be retained, but that a pathway to broadening the terminology is inbuilt into HEI practices throughout its lifetime, in recognition of these strong arguments for broadening the current Framework terminology from SVH to GBV. This is because Expert Group consultations revealed that many HEIs have only recently finished passing policies and devising procedures using this terminology and these policies and procedures have not yet had a chance to become embedded or operationalised. As such, changing the scope and terminology at this stage would require this work to be immediately redone. Instead, the Expert Group wish to allow time for current policies and practice to become embedded before recommending this broadening of scope. It has also been evident from our consultations that such a change in terminology at this point might result in a blurring or lack of focus on SVH as key elements in the revised (and future) Framework. Perhaps most importantly, however, SVH are forms of violence that are particularly prevalent in the HEI sector, and so our recommendation for retaining this terminology for the period of the revised Framework recognises that naming SVH will help to ensure that these forms of violence must be explicitly addressed.

Expanding the Framework to include staff

While the evidence supporting the need for a Framework for HEIs highlights the prevalence among students, there is also evidence that this is an issue for staff. This was recognised during the development of the ESVH Implementation Plan in 2022 and a related action was included (Action 4: Formally include outcomes for staff in the Framework for Consent as part of Review).[22]

In addition, the Expert Group note from our research and stakeholder consultations, that many of the HEI measures that have been adopted to address ESVH have also been applied to staff, for example policy revisions, availability of support structures, etc.

[22] In addition to the experiences of students documented in the 2021 survey results the Report on the National Survey of Staff Experiences of Sexual Violence and Harassment in Irish Higher Education Institutions demonstrated that 24% of staff respondents indicated to have experienced sexualised comments in reference to gender, sexuality, race or ethnicity, religion, or trans / non-binary identity

On that basis the Expert Group has specifically considered the applicability of the revised Framework to staff and notes that the unanimous view expressed by all of the consulted groups is that a revised Framework should explicitly include staff - both as victim-survivors and as perpetrators.

In particular, during the course of engagement with trade unions and human resource (HR) professionals, they not only supported staff applicability, but trade unions also highlighted the opportunity and benefit of joint HEI and trade union initiatives, as an approach to achieving revised Framework objectives.

With this amendment, it may be necessary for staff codes of conduct within HEIs to be revised but this will be a matter for consideration by each individual HEI. Research from the UK demonstrates that most students – particularly women students – are uncomfortable with staff having romantic or sexual relationships with students.[23] Where these relationships do occur, they may be preceded by 'grooming' and 'boundary-blurring' behaviours that make it more difficult for students to freely consent[24] and indeed, a significant proportion of staff-student relationships are not fully consensual.[25] Therefore, in expanding the Framework to include staff, HEIs should consult with student bodies to clarify and codify appropriate professional boundaries between staff and students.

Transparency

A key priority of SVH survivors who have reported their experiences to their institution is transparency in how their reports are being dealt with, and how the institution tackles this issue.[26] More generally, increased transparency around institutional approaches to addressing SVH allows public scrutiny of institutions' work in this area, which can in turn lead to greater institutional accountability.

However, there are significant challenges to institutional transparency in this area, due to legal obligations around privacy in relation to individual cases as well as fears of negative publicity in relation to sharing institution-level data. This means that individual HEIs do not have any incentive to decide to share institution-level data; instead, transparency needs to occur at a national level, with shared data

[23] Bull, A. et al. (2023). Professional boundaries between faculty/staff and students in UK higher education: Students' levels of comfort with personal and sexualised interactions. Journal of Further and Higher Education, 47(6), 711–726. https://www.tandfonline.com/doi/full/10.1080/0309877X.2023.2226612 ; Bull, A. (07/23). What students think about staff-student professional boundaries. Wonkhe. https://wonkhe.com/blogs/what-students-think-about-staff-student-professional-boundaries/ [accessed 5 November 2025]

[24] Bull, A., & Page, T. (2021). Students' accounts of grooming and boundary-blurring behaviours by academic staff in UK higher education. Gender and Education, 33(8), 1057–1072. https://www.tandfonline.com/doi/full/10.1080/09540253.2021.1884199

[25] Office for Students & Savanta. (2024). Sexual Misconduct Prevalence Poll Summary of key findings. https://www.officeforstudents.org.uk/for-providers/student-protection-and-choice/harassment-and-sexual-misconduct/sexual-misconduct-survey/ [accessed 5 November 2025]

[26] Bull, A. (2024). Learning from survivors: Reporting parties' perspectives on how higher education institutions should address gender-based violence and harassment. Higher Education Quarterly, 78(2), 1123–1137. https://onlinelibrary.wiley.com/doi/10.1111/hequ.12517

standards and transparency requirements across all HEIs.

As a result, transparency is one of the guiding principles of the revisions the Expert Group has recommended in the revised Framework, in particular Outcome 5: Building trust through transparency. This outcome requires HEIs to publish information and key data on their approach to addressing SVH. This allows staff, students, and the wider public to understand how HEIs are approaching this issue, to track changes over time, and ultimately, to build trust between HEIs and their students and staff in this area.

A further aspect of transparency is in relation to reporting processes. Currently, victim-survivors who report incidents to their HEI do not have the right to be informed of any actions that are taken as a result of their report, such as sanctions imposed on the person responsible (in the case of an upheld finding). In order to build trust with reporting parties, victim-survivors need to know whether their actions – in reporting to the HEI – have been effective. As such, the Expert Group have included information in Outcome 6 on reporting to clarify the importance of transparency and victim-survivors' rights in reporting processes.

Prioritising safety

Students and staff who are subjected to SVH are likely to need support to continue in work/study. In order to enable this, institutional responses to SVH need to avoid a one-size-fits-all approach, for instance, requiring a formal report in order to take action; such an approach may discourage some people from disclosing and does not take into account intersectional identities. Some survivors may simply want the harassment or abuse to stop but do not want punitive sanctions for the person/people responsible. Others may not want to go through a formal reporting process but may need informal adjustments such as moving to a different class. In some instances, a risk assessment will point towards the potential for harm towards others in the HEI community, as sexual violence and harassment is often perpetrated serially.[27] In these instances, a formal approach is likely to be required. However, a formal approach should not be the default or sole option available to students and staff.

A multi-faceted approach is also in line with the emerging international shift towards addressing SVH as

[27] Hales, S. T., & Gannon, T. A. (2021). Understanding Sexual Aggression in UK Male University Students: An Empirical Assessment of Prevalence and Psychological Risk Factors. Sexual Abuse, 34(6), 744–770. https://journals.sagepub.com/doi/10.1177/10790632211051682 . See also Cantalupo, N. C., & Kidder, W. C. (2017). A Systematic Look at a Serial Problem: Sexual Harassment of Students by University Faculty (SSRN Scholarly Paper No. ID 2971447). Social Science Research Network. A Systematic Look at a Serial Problem: Sexual Harassment of Students by University Faculty by Nancy Chi Cantalupo, William Kidder :: SSRN [accessed 5 November 2025]

an occupational health and safety issue, as well as an EDI issue.[28] This approach recognises the severity and pervasiveness of SVH while acknowledging that survivors who report or disclose incidents to their HEI should not have to bear the burden of going through a formal reporting process in order to access safety measures or adjustments to their work/study environment. The complex process of managing risk to the reporting party/ies and to the wider student/staff body, the expertise required as well as institutional protocols for balancing and managing this risk need to be seen as a key priority across the sector (as noted in Outcome 10 on staff training). In recognition that HEIs are likely to need further expertise and good practice examples in this area, as one of the priority areas for national action (see below), the Expert Group recommends that the HEA should endeavour to commission a report outlining promising directions and pathways at national level relating to safety measures for both staff and students, to fill the gap between informal and formal approaches. The Expert Group is also recommending safety is prioritised in hiring processes across the sector, as outlined in Outcome 8.

Strengthening formal reporting structures

In order to build an approach where safety is prioritised, formal disciplinary processes will be needed in some cases. Expert Group consultations with the sector highlighted formal report-handling as a key challenge, with more work needed to make report-handling, investigations, and disciplinary processes trauma-informed and effective.

This challenge needs to be understood within the wider context of significant shifts in how GBV more widely is being managed across society, as noted in the Chair's foreword. Under equality legislation employers and education institutions have legal duties to prevent SVH in certain circumstances. However, the significant challenges for employers and education institutions of carrying out formal investigations into SVH are only now being addressed.

Within the higher education sector, the Expert Group recommendations for the revised Framework aim to build capacity, expertise, and institutional protocols in this area, while recognising that this is a longer-term journey that involves significant challenges. At present, this work is still at early stages within most HEIs. While policies for handling formal reports are now in place, operationalising procedures for handling breaches of SVH policy – with clear trauma-informed investigation and discipline processes – will require ongoing work. This work is challenging, not least because significant levels of expertise are needed to carry

[28] In January 2023, Ireland ratified the International Labour Organisation Convention C190 which pledges to address harassment and violence, including gender-based violence, as part of workplace health and safety provision and to 'take into account violence and harassment and associated psychosocial risks in the management of occupational safety and health': International Labour Organization. (2019). *Convention C190—Violence and Harassment Convention, 2019 (No. 190)*. https://normlex.ilo.org/dyn/nrmlx_en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C190 [accessed 5 November 2025]

it out safely and effectively. The planned HEA funding call to support collaboration between HEIs to develop guidelines and standards for investigations of breaches of institutional SVH policy is one important step that will support this work. The Expert Group also call on bodies such as Cuan to provide cross-sector support that will enable different employers and education institutions to learn from one another, both within and outside higher education. Further steps for HEIs are highlighted in the revised Outcomes 6, 7 and 10.

Whistleblowing and protected disclosures

Reports of SVH as well as oversight of institutional processes in this area are dealt with by individual HEIs. However, it is important to highlight the broader governance and accountability structures within which these processes occur. HEIs and their Governing Authorities are responsible for the monitoring and implementation of policies related to EDI and ESVH in their institutions. The Governing Authorities of HEIs are responsible for ensuring that good governance, conduct, management, and accountability arrangements are in place in their institutions. This includes the responsibility of each HEI to demonstrate that it is accountable and compliant with the equality requirements as set out in relevant legislation. Where there are specific, alleged failures or breaches of requirements by HEIs, these should be referred to the appropriate internal procedure of the HEI in the first instance. Depending on the nature of the matter there may also be further recourse to An Garda Síochána, the Workplace Relations Commission (WRC), Office of the Ombudsman or to otherwise seeking a legal resolution. Assistance and advice are available from the Irish Human Rights and Equality Commission.

As well as these routes for raising concerns, all Irish public sector employers are obliged to implement the Protected Disclosures Act 2014 as amended by the Protected Disclosures (Amendment) Act 2022 (together the PD Act)[29]. HEIs should have procedures in place to support workers who wish to make a protected disclosure in accordance with the provisions of the PD Act. The PD Act sets out a specific definition of 'workers' and gives specific remit to certain organisations as prescribed persons for specific remits under its provisions. As such, this may not provide direct routes for students and third parties seeking to make protected disclosures related to ESVH. It is recommended that HEIs and the HEA provide clear and publicly available information on formal reporting and disclosure pathways for staff, students and third parties. Complaints made to the HEA, or issues brought to its attention, whether made under the terms of the PD Act or otherwise, are always taken seriously but, where it relates to matters in a HEI, the HEI may be the more appropriate party to engage with such complaints and issues. or otherwise, are always taken seriously but, where it relates to matters in a HEI, the HEI may be the more appropriate party to engage with such complaints and issues.

[29] https://revisedacts.lawreform.ie/eli/2014/act/14/revised/en/pdf?annotations=true [accessed 5 November 2025]

Including student, staff and survivor voices from diverse groups

Currently, student representatives sit on institutional working groups for ESVH. In Expert Group consultations, students described positive experiences of sitting on such committees. However, the experiences of different groups of students and staff – and most notably, victim-survivors of SVH – are unlikely to be captured by such representative structures. In addition, there is a risk that having a small number of student representatives engaged in this work puts an undue burden on those students who take up this role.

It is also important to distinguish between student/staff perspectives in general, and survivor perspectives specifically. Students/staff engaged in this work may be survivors whether or not they choose to publicly identify in this way. However, engaging survivors' voices explicitly is also crucial. Such a step needs to be carried out in partnership with expertise from specialist agencies, and as such this is likely to be a longer-term shift rather than an immediate action; it is crucial to plan such work carefully.

In recognition of the importance of engaging student, staff, and survivor voices in ESVH work, this work is explicitly included in Outcome 3, as outlined below. More generally, opportunities for including survivors' voices are highlighted in key points throughout the recommendations in the revised Framework, including development of training, messaging and communications, reporting structures, and prioritising transparency.

This work cannot be carried out without dedicated, ongoing funding. Work previously undertaken by the Irish Universities Association and the Propel project on costing the implementation of the 2019 Framework indicated the scale of resourcing requirements for each HEI. As such, the Expert Group recommends that an appropriate level of investment is secured to sustain and support HEI activity in this area. HEIs need to incorporate this work as a priority into their financial planning and budgets. The Expert Group note that further government investment in this area will be needed in order to build capacity across the sector and deliver on this Framework.

In addition, the recurrent funding for SVH Prevention and Response Manager roles, where available, should continue to be ringfenced, and HEIs should continue to ensure that this is allocated for the ESVH role and not subsumed into general allocations.

Considerations and additional discussion

The Expert Group's discussions also brought up issues that are not explicitly included within the outcomes, but that the Group wish to highlight. These are included in 'highlight boxes' next to the relevant outcome, below and above.

Recommendations for updating and renewing the 2019 Framework Outcomes

Summary of revised Framework Outcomes

Pillar 1: Effective Structures and Roles in Place		
1	*Senior leadership commitment*	Senior leadership is responsible for implementation of the Framework and demonstrate commitment to ESVH in their HEI. The Institutional Working Group on ESVH within each HEI has appropriate cross university representation from all relevant stakeholders and ensures a holistic/whole-of-HEI approach to addressing SVH.
2	*Governing Authority responsibility*	In line with their responsibility for effective governance oversight and reporting obligations to the HEA, Governing Authorities or principal committees of governing authorities ensure appropriate expertise is present in relevant committees to scrutinise and assess institutions' work on ESVH. Governing Authorities schedule ESVH as an annual agenda item.
3	*SVH Prevention and Response Manager role clarity*	Responsibilities of SVH Prevention and Response Manager roles are clear. There is appropriate support in place to enable staff to effectively carry out this role.
4	*Drawing on diverse student, staff, and survivor voices*	Student, staff, and survivor voices who represent the diversity of the community are involved in the design, delivery, and/or evaluation of ESVH work.

Pillar 2: Recording of Incidents and Transparent Data Reporting		
5	*Building trust through transparency*	Institutions publish information on ESVH work as part of their public EDI reporting, including anonymised data on formal reports and outcomes, good practice case studies, an evaluation of education and training initiatives, and other relevant data.

Pillar 3: Institutional Policies and Procedures		
6	*Accessible reporting*	The policies and reporting procedures for students and staff are compatible with the rights of all parties, cognisant of the needs of vulnerable groups, have the confidence of the higher education community, and are clearly signposted in survivor-friendly versions student handbooks, on institutional webpages, and at the start of anonymous reporting webpages or similar resources.
7	*Prioritising safety*	HEIs draw on a range of measures to intervene after a disclosure or formal report to ensure that safety and continued access to study/work for both reporting parties and other members of the institution is prioritised. Adequate resources are in place for supporting staff and students who make disclosures.
8	*Safer staff recruitment*	Protocols to support safer staff recruitment and promotion are in place.

Pillar 4: Targeted Training and Awareness-raising Initiatives		
9	*Student education and training*	In their training initiatives, HEIs include awareness-raising activities to enable all enrolling students to create and uphold a respectful, safe and supportive community.

10	*Staff training*	Staff participate in training and awareness-raising activities to enable them to create and uphold a respectful, safe and supportive community. Staff also receive training in responding to disclosures and signposting to the right support. Those staff working in student support, counselling and applicable/relevant HR roles receive the essential specialist training appropriate to their roles.
11	*Communications and campaigns*	HEIs use ongoing messaging to disseminate information consistent with the Framework aims for cultural change and awareness.
12	*Evaluating effectiveness*	HEIs create and implement systems for measuring effectiveness of the implementation of the revised ESVH Framework and its initiatives within their HEI.

Pillar 1: Effective Structures and Roles in Place

Outcome 1: Senior leadership commitment

Senior leadership within HEIs is responsible for implementation of the Framework and should demonstrate commitment to ESVH in their HEI.

The Institutional Working Group on ESVH within each HEI has appropriate cross university representation from all relevant stakeholders and is sufficiently empowered to ensure a holistic/whole-of-HEI approach to addressing SVH.

The Expert Group suggests a clear and transparent description of the responsibility for the Framework, by addressing the commitment and action needed from senior leadership. This way, a revised Framework will align closely with both the ERA Zero-Tolerance Code of Conduct on GBV and the current praxis in developing and implementing ERA Gender Equality Plans. In designating a responsible person, the HEI should ensure that ESVH work addresses both staff and students and ESVH work remains strongly interconnected with the broader EDI work of the HEI.

By keeping the definition as open as possible (and not pointing at a certain function, person or role) it will be possible for individual HEIs to suggest different roles/persons with senior management positions for this outcome, without retracting from the important message of the 2019 Framework to anchor responsibility for implementation within senior management.

The Expert Group recommends that each HEI develops text outlining the role and responsibilities of the senior HEI leader with responsibility for ESVH. The purpose of the role is to act as the HEI senior leader with institutional responsibility and accountability for the HEI's ESVH Programme. Suggested principal responsibilities include:

- To champion ESVH, and implementation of the Framework at the HEI senior leadership team as a strategic institutional priority.
- To convene and chair the HEI ESVH Working Group and ensure its effective performance.
- To support the SVH Prevention and Response Manager to achieve impact and engagement across the HEI.
- To hold HEI executive accountability in reporting to the HEI Governing Authority, to the HEA, and to the wider institutional community.

Outcome 2: Governing Authorities' responsibility

In line with their reporting obligations to the HEA, Governing Authorities or principal committees of Governing Authorities ensure appropriate expertise is present in relevant committees to scrutinise and assess institutions' work on ESVH. Governing Authorities schedule ESVH as an annual agenda item.

Ending sexual violence and harassment has been identified and accepted as a significant institutional priority, and on this basis, it must be visible within the scope of oversight by HEI Governing Authorities. Currently, Governing Authorities provide confirmation to the HEA though the Annual Governance Statement that SVH is being addressed in the HEI. The Expert Group notes the current reporting obligations of Governing Authorities and is of the view that this must continue to be embedded in the work of Governing Authorities.

The Expert Group is of the view that HEI Governing Authorities or a principal committee or Advisory Group of the Governing Authority need appropriate expertise, where possible, both to fulfil their oversight role, and to champion the issue at Governing Authority level.

Noting the many demands on Governing Authorities, and the broad skill mix required, the Expert Group is of the view that this particular expertise may reside within the Governing Authority itself, or within the relevant subcommittee or advisory group of the Governing Authority, with appropriate accountability, regular and meaningful reporting to the Governing Authority and appropriate engagement with the Governing Authority. In addition to the presence of specific subject matter expert(s), appropriate training for the Governing Authority/subcommittee members tasked with scrutinising this work is likely to be necessary.

The Expert Group recommends that reporting on HEI ESVH implementation plans and strategy be included in the planning of the annual Governing Authority schedule in order to ensure regular review and oversight at Governing Authority.

Outcome 3: SVH Prevention and Response Manager role clarity

Responsibilities of SVH Prevention and Response Manager roles are clear. There is appropriate support in place to enable staff to effectively carry out this role

The Expert Group welcomes and acknowledges the ring-fenced and recurrent funding for the

establishment of SVH Prevention and Response Manager roles. As the funding is recurrent, HEIs can fill this post on a permanent basis. Initial indications are that the roles, both within institutions, and collectively sector-wide, are having a significant impact in delivering the 2019 Framework objectives. Yet, Expert Group consultations demonstrated that the benefits of the roles could be further optimised.

It is not uncommon with the establishment of new roles that a process of embedding the role will evolve over time which clarifies the parameters, relationship dynamics and responsibilities of the role within the wider context of the HEI structure and culture. Accordingly, the timing of this review provides an opportunity to consider the effectiveness of the role to date, and to ensure that the role holders are supported to succeed, and that the investment in the positions achieves the desired impact.
A key risk in the creation of specialist roles such as the SVH Prevention and Response Managers is that they are perceived to have sole responsibility for the issue within the institution and that they are left to 'carry the can' accordingly. The Expert Group notes that the institution-wide remit of such posts requires a holistic and joined-up approach, where responsibilities are shared across the institution and note the importance of senior leadership in facilitating the managers to collaborate seamlessly with internal stakeholders on an institution-wide basis.

Outcome 4: Drawing on diverse student, staff, and survivor voices

Student, staff, and survivor voices who represent the diversity of the community are involved in the design, delivery, and/or evaluation of ESVH work

Student representation on ESVH committees and working groups is essential for ensuring that initiatives and policies reflect student priorities, needs, and interests. However, student voices need to go beyond the role of 'strategic partner'; students can also be involved as facilitators (for example being involved in delivering or supporting HEI ESVH work), or as evaluators (for example participating in activities that evaluate existing provision and processes).[30]

It is the view of the Expert Group that survivor voices need to be engaged through methods distinct from those used to engage general student voices (even though students involved in this work may also be survivors). There is a risk that survivor volunteers may be retraumatised by this work and as such it needs to be planned and delivered jointly with specialist agencies, alongside appropriate support for

[30] Dickinson, J., & Blake, S. (2022). How to involve students in work on gender-based violence. In C. J. Humphreys & G. J. Towl (Eds.), Stopping Gender-based Violence in Higher Education: Policy, Practice, and Partnerships (pp. 104–117). Routledge.

those involved.

Finally, as the Expert Group is proposing that higher education staff should be formally included in the revised Framework, engaging diverse staff voices is also crucial. Partnerships and consultation with staff trade unions are an important aspect of staff engagement. In order to ensure that a range of perspectives are engaged, other staff groups such as LGBTQ+ and international staff networks could also be engaged.

Drawing on staff, student and survivor voices who represent the diversity of the community is crucial not only for ensuring that ESVH policies and initiatives are appropriate for those engaging with them, but such steps will also support building trust, and will make it less likely that survivors will need to share their experiences on social media or in public if they find that they are not being listened to by their institution.[31]

This outcome constitutes a longer-term process that will not be achieved immediately. It is included as an outcome in the revised Framework to indicate its importance in this work. The Expert Group recommends that protocols for engaging these perspectives are formally considered as part of planning initiatives and policies on SVH, and that student/staff/survivor engagement strategies are reported as part of HEIs' annual public reporting (see Outcome 5).

Pillar 2: Recording of Incidents and Transparent Data Reporting

Outcome 5: Building trust through transparency

Institutions publish information on ESVH work as part of their public EDI reporting, including anonymised data on formal reports and outcomes, good practice case studies, an evaluation of education and training initiatives, and other relevant data.

In order to build trust with student and staff and to support institutional accountability, the Expert Group recommends HEIs should publish an annual public report on ESVH as part of their existing EDI reports (for example, as part of their Public Sector Duty reporting or other annual reports). HEIs have

[31] Bull, A. (2023). Speaking Out about Gender-based Violence and Harassment in Higher Education. In R. Raaper, J. Conner, C. G. Valenzuela, & L. Gauthier (Eds.), The Bloomsbury Handbook of Student Voice in Higher Education. Bloomsbury Academic. https://www.bloomsbury.com/uk/bloomsbury-handbook-of-student-voice-in-higher-education-9781350342477/

had time to embed systems for gathering and reporting data on formal reports of SVH as this has been reported to the HEA for the past three years. The Expert Group therefore considers it timely to shift towards a public reporting model, while being cognisant of HEI data protection obligations and responsibilities.

The Expert Group recommends that the following reporting categories are required:

a) Annual data (aggregated and anonymised) on formal reports, outcomes and sanctions relating to staff and students
While some HEIs may have very small numbers of formal and/or anonymous reports, this should not preclude them from reporting aggregate numbers (following the statistical protocols used by the HEA, i.e. not publishing numbers less than 10). These protocols may be stated explicitly in the report in order to mitigate against anyone not coming forward for fear of being identifiable. If there are few or no formal or anonymous reports, such reports will not contain much useful data in the early years but should still be included in annual data reports to support transparency. Sharing this data with the staff and student community will support greater awareness and productive dialogue about how the HEI is addressing SVH.
b) Aggregate anonymous reporting data from Speak Out
c) Current ESVH committee membership, records of meetings, and a statement from Chair (or the person responsible for briefing the HEI's governing authority)
This could include details of how ESVH work is organised within the HEI, including the member of senior management who is responsible for implementing the revised Framework as well as where responsibility sits for resourcing this work.
Details of how HEIs are drawing on diverse student, staff, and survivor voices.
Details of how the HEI plans to resource implementation of the revised Framework in the coming year (i.e. its spending commitments).

HEIs may also wish to include 'promising practice' examples or case studies to demonstrate to the student and staff body the types of work that are occurring in this area. In the event that an HEI is

unable to publish any of the material outlined above, this would need to be justified to the HEA.[32]

Maximising the impact of Speak Out

The Speak Out anonymous reporting tool is now well embedded within the sector. However, anonymous reporting, while it is an important source of institution-level data on SVH, should not be seen as an end in itself. Rather, over time, named reports should increase and anonymous reports should decrease as HEIs build trust with their student and staff body and as awareness of reporting options grows. In order to support this direction of travel, the Speak Out tool can be further enhanced as follows:

- Once HEIs have formal reporting structures and clear procedures for conducting investigations and discipline processes in place and are ready to receive reports, the landing page for Speak Out institutional webpages should have an easily accessible link for making formal reports and for seeking support, as well as links to institutional policies and procedures for formal reporting. There should be a clear explanation on this landing page explaining that anonymous reports are different to formal reports and do not usually allow any direct action to be taken. The Speak Out National Office can support HEIs to update their website text by updating their template text.
- Data analysis of anonymous reporting compared to formal reports over time should demonstrate a shift from the former to the latter, leading to more students and staff making named reports. This would be an indicator of the effectiveness of reporting structures as well as staff and student training.

[32] See a good practice example from the University of Sydney (note that less stringent data protection requirements mean that actual case numbers are reported here rather than rounded figures): https://www.sydney.edu.au/about-us/vision-and-values/annual-report.html [accessed 5 November 2025] A UK-based good practice example is available from Durham University in their Annual Trend Monitoring Papers: https://www.durham.ac.uk/colleges-and-student-experience/student-support-and-wellbeing/studentconduct/sexual-misconduct-violence/annual-trend-monitoring/ [accessed 24 September 2025] A trend monitoring template is available in: DiSantis, C. J., & Towl, G. J. (2025). Addressing Student Sexual Violence in Higher Education: A Good Practice Guide (2nd edition). Emerald Publishing Limited: p. 331 - Resource 2: Trend Monitoring and Statistical Reporting Guide

Pillar 3: Institutional Policies and Procedures

Outcome 6: Accessible reporting

The reporting policies and procedures for students and staff are compatible with the rights of all parties, cognisant of the needs of vulnerable groups, have the confidence of the higher education community, and are clearly signposted in survivor-friendly versions of student handbooks, on institutional webpages, and at the start of anonymous reporting webpages or similar resources.

As outlined above in 'Our approach to the revised Framework', the Expert Group recognises the significant challenges of building systems for handling formal reports of SVH and recommends that this work is seen in the context of a long-term shift towards all institutions across society being responsible for addressing SVH.

As a result – and in recognition that the revised Framework will be extended to formally include staff within higher education – the Expert Group recommends retaining this outcome from the 2019 Framework. The Expert Group note the significant resource that is required for embedding systems for handling formal reports, as well as the expertise needed from staff engaged in this work; these issues should be recognised in resourcing of ESVH work within institutions.

There remain challenges in embedding formal reporting systems, such as the intersection with criminal justice processes (for reports of SVH that constitutes a criminal offence) and the availability of specialist investigators. In addition, it is the view of the Expert Group that there is a risk that reporting parties are afforded fewer rights than responding parties in formal reporting processes.[33] The Irish Human Rights and Equality Commission *Code of Practice on Sexual Harassment and Harassment at Work* emphasises the importance of fairness in investigations, noting that the investigation must ensure procedural fairness throughout. For example, the complainant and alleged perpetrator should be provided with the appropriate notice of the investigation and be furnished with all relevant disclosure in advance. Also, both parties should be afforded an opportunity to comment on assertions and responses made.[34]

However, the Code of Practice does not specify whether reporting parties have the right to call witnesses, to be told about actions taken at the end of a disciplinary process that follows their

[33] In the UK context, this risk has been highlighted: Bull, A., & Shannon, E. (2023). Higher Education After #MeToo: Institutional responses to reports of gender-based violence and harassment. The 1752 Group/University of York. https://1752group.com/research/higher-education-after-metoo/ [accessed 5 November2025]

[34] Irish Human Rights and Equality Commission. (2022). Code of Practice on Sexual Harassment and Harassment at Work https://www.ihrec.ie/publications/code-of-practice-on-sexual-harassment-and-harassment-at-work-2/ [accessed 5 November 2025]

complaint, or to appeal disciplinary outcomes where there are procedural errors or if new evidence comes to light. In a fair process, reporting parties should have these rights.[35] While it has been argued that disciplinary sanctions are the private data of responding parties, recent research has suggested that their right to privacy needs to be balanced against the risks to the reporting party from non-disclosure of outcomes.[36] For example, it may leave reporting parties unable to defend themselves against claims that they made a false accusation, or lack of information on sanctions imposed on the responding party may leave them feeling unsafe and unable to come to campus.[37] The Expert Group therefore strongly urges that the interpretation of 'procedural fairness' in this context should be clarified to include these rights to ensure that report-handling processes are not contributing to indirect discrimination.[38]

The Expert Group's view is that these issues around strengthening formal reporting processes need to remain priority actions for the sector, supported by the HEA. As noted above in the highlights section, the Expert Group has also made recommendations to ensure that the Speak Out anonymous reporting tool enables students and staff to engage with formal reporting processes, where these are ready to be used. In addition, the Expert Group recommends that procedures (as well as policies) for handling reports and for investigations and disciplinary processes are made publicly available (which many HEIs already do). The Expert Group supports work that is underway to develop capacity for investigating breaches of SVH policy in HEIs, which aims to support the development of common standards and guidelines on investigations.

As with other areas of this revised Framework, the diversity of the staff and student body needs to be a key concern in embedding formal reporting systems; groups such as visa holders/international students,

[35] DiSantis, C. J., & Towl, G. J. (2025). Addressing Student Sexual Violence in Higher Education: A Good Practice Guide (2nd edition). Emerald Publishing Limited, p.564-568.

[36] Cowan, S., Munro, V. E., Bull, A., DiSantis, C. J., & Prince, K. (2024). Data, disclosure and duties: Balancing privacy and safeguarding in the context of UK university student sexual misconduct complaints. Legal Studies, 1–20. https://www.cambridge.org/core/journals/legal-studies/article/data-disclosure-and-duties-balancing-privacy-and-safeguarding-in-the-context-of-uk-university-student-sexual-misconduct-complaints/87F5FB1D384340C4BFED18E74B0208D9

[37] DiSantis, C., Prince, K., Munro, V., Bull, A., & Cowan, S. (2024, July 8). Complainants must be told the results of sexual misconduct investigations. Times Higher Education (THE). https://www.timeshighereducation.com/blog/complainants-must-be-told-results-sexual-misconduct-investigations [accessed 5 November 2025] Cowan, S., Munro, V. E., Bull, A., DiSantis, C. J., & Prince, K. (2024). Data, disclosure and duties: Balancing privacy and safeguarding in the context of UK university student sexual misconduct complaints. Legal Studies, 1–20. https://www.cambridge.org/core/journals/legal-studies/article/data-disclosure-and-duties-balancing-privacy-and-safeguarding-in-the-context-of-uk-university-student-sexual-misconduct-complaints/87F5FB1D384340C4BFED18E74B0208D9

[38] As noted by The 1752 Group and McAllister Olivarius (2020, p.4-5), in relation to the UK context: In a society where vastly more sexual misconduct complaints are made by women against men than vice versa, a process for investigating sexual misconduct complaints which gives those responding more rights than those complaining might well be thought to place women as a group at a particular disadvantage and so to amount to indirect discrimination, in breach of the Equality Act 2010. The 1752 Group, & McAllister Olivarius. (2020). Sector guidance to address staff sexual misconduct in UK higher education: Recommendations for reporting, investigation and decision-making procedures relating to student complaints of staff sexual misconduct. https://1752group.com/wp-content/uploads/2020/03/the-1752-group-and-mcallister-olivarius-sector-guidance-to-address-staff-sexual-misconduct-in-uk-he-1.pdf f [accessed 5 November 2025] See also: Bull, A., Calvert-Lee, G., & Page, T. (2021). Discrimination in the complaints process: Introducing the sector guidance to address staff sexual misconduct in UK higher education. Perspectives: Policy and Practice in Higher Education, 25(2), 72–77. https://www.tandfonline.com/doi/full/10.1080/13603108.2020.1823512

mature students, graduate students, disabled staff and students, LGBTQ+ or racially minoritised students/staff may face specific barriers to or challenges in engaging with formal reporting. Survivor voices are an invaluable resource for HEIs in creating trauma-informed approaches in this area, and wherever possible, their perspectives should inform development and evaluation of reporting structures.

In the consultations, the Expert Group explored the possibility of requiring institutions to gather formal feedback to evaluate reporting experiences. In light of the public data reporting obligations that being are recommending for the sector, at this stage the Expert Group have stopped short of recommending that evaluation data on reporting systems is gathered. The Expert Group, however, hope that this will be considered in future.

Outcome 7: Prioritising safety

HEIs draw on a range of measures to intervene after a disclosure or formal report to ensure that safety and continued access to study/work for both reporting parties and other members of the institution is prioritised. Adequate resources are in place for supporting staff and students who make disclosures.

For survivors of SVH, safety is a paramount concern. While studying/working - and perhaps even resident - at an HEI, if they are targeted by another member of their institution the violence or harassment may be ongoing or they may fear that it will recur. Regardless of whether a formal process is underway (whether via the criminal justice system or the HEI policy and/or both), immediate safety measures or other adjustments – informed by an expert-led risk assessment to ascertain further risk of harm to the reporting party or other students/staff where appropriate – should be available. These could include – where the victim-survivor wants it – support with moving accommodation; changing to a different class; a no-contact agreement; extensions on academic work; or other bespoke interventions specific to the circumstances. Alongside these, specialist support such as counselling is crucial.

Survivors should not have to make a formal report to the institution to be able to access such measures. While the options for such measures are necessarily limited where formal routes are not pursued, there is scope for HEIs to maximise the safety measures that are implemented for students and staff facing SVH.

Safety measures should include an expert-led risk assessment, with input from the reporting party/ies, to ascertain whether there is a risk to self for reporting and responding parties; further risk of SVH to the reporting party/ies; or risk to the wider student/staff population. If such a risk exists, the HEI may have to take forward a university-led investigation as part of its duty of care, even in the absence of a formal report from a staff member or student.[39]

Prioritising safety should also include interventions for students or staff who are at risk of, or found to have, carried out harmful behaviours, and/or behavioural monitoring where appropriate.

To support this work, one of the priority areas for national action that the Expert Group recommends (as outlined below) is that the HEA should endeavour to commission a report outlining promising directions and practices at national level relating to safety measures for both staff and students, drawing on the specialist expertise of the organisations working with SVH victims/survivors on effective approaches as well as international good practice within higher education. This report can explore and recommend good practice on issues arising in this area, for example, what forms of communication from students and staff would constitute a disclosure that triggers safety action.

[39] For an example of such a policy, see paragraph 9.2 in: University of Cambridge. (2023). Dignity at Work Policy. University of Cambridge. dignity_at_work_policy_01_08_25.pdf [accessed 24 September 2025]

Including Research Funding Organisations

Research funding organisations (RFO) are often considered not relevant in ESVH, as is evident from large-scale policy mapping initiatives in the GENDERACTIONplus project. Further, the Expert Group view is that across the ERA, there may be a culture of distrust or mistrust between funders and HEIs, as the former set the conditions for the latter, but also because funders do not have any employer rights towards researchers (with the exception of certain research foundations and private funding programs). Overall, there do not seem to be any clear incentives for funders to take on the challenge to end SVH. However, RFOs exert power over research to such a large degree and run the risk of legitimising violent and abusive behaviour among recipients of their funding if not invested in and committed to the challenges of ESVH. To support RFOs work in this area, a specific RELIEF model was developed within the GENDERACTIONplus project. It especially addresses RFO internal procedures and mechanisms relevant for ending gender-based violence. This model consists of six different parts:

- Role clarity: Funders redefining themselves as key actors in ending gender-based violence.
- Ethical governance: Using ethical statutes on research misconduct as a way of inhibiting perpetrator behaviour and cultures in HEIs.
- Legal framework: Supplementary actions taken by funders beyond legal boundaries, such as withdrawing or withholding funding, setting up whistleblowing systems, building support structures.
- Internal procedures: Mainstreaming gender-based violence notions throughout the funding process, including asking HEIs to declare there are no ongoing processes or cases of gender-based violence in the name of an applicant.
- Evaluation and monitoring: Integrating notions of gender-based violence in already existing evaluation and monitoring mechanisms in the funding system.
- Funding: Taking a proactive approach towards funding research on gender-based violence.

By acknowledging their responsibility to ensure research and innovation funding structures are actively engaged in counteracting the risks and harms of GBV, RFOs will contribute directly to protecting potential victims and, because of this, foster high quality in research and education.

Outcome 8: Safer staff recruitment

Protocols to support safer staff recruitment and promotion are in place

While information on criminal convictions may be required as part of certain staff recruitment/vetting processes, the higher education sector internationally does not have wider systems in place to support safer recruitment processes, such as values-based interviewing or specific sharing of information about ongoing or upheld disciplinary investigations from other employers, other than standard reference checking. This means that staff who perpetrate SVH towards other staff or towards students could potentially move between institutions with impunity.

The ERA Code of Conduct recommends introducing "mechanisms for inter- and intra-institutional accountability to ensure the non-recurrence of gender-based violence at the individual and systemic levels, including measures to prevent multi-site serial misconduct". The Expert Group therefore recommend that safer recruitment processes such as asking for details of ongoing or upheld disciplinary processes from previous employers should be explored across the sector. Such systems can also be applied to internal promotion or recruitment processes within HEIs, for example where staff are taking on a new role with their existing employer. It is the view of the Expert Group that such information-sharing protocols should form part of a wider safe recruitment strategy.

In order to support the development of this work across the sector, the Expert Group recommends steps in this area as one of the priority action areas nationally (see below). The HEA should endeavour to convene a working group of HR representatives from the sector to review good practice in this area and suggest processes for self-evaluation of recruitment processes in HEIs. HEIs will also be asked to describe their current practices in relation to safer recruitment processes in their reporting to the HEA. This information can be drawn on by the working group in their review.

The Expert Group proposes that by the end of the revised Framework period that all HEIs should have completed a self-evaluation of their recruitment processes and taken steps towards a safer recruitment process, based on the good practice identified by the working group.

It is important to note that while serial perpetration may also be carried out by students who move between HEIs, the Expert Group is recommending systems for staff recruitment and promotions as a first step. This is because staff are in a position of trust within higher education and are likely to be

employed by an institution for a significant period of time. However, the Expert Group recognise that there is also a conversation to be had around such information-sharing for students moving between institutions. Future work on SVH should explore whether and how information should be shared between HEIs relating to students who are alleged or found to have perpetrated SVH. This work may be able to draw on learning from member states and institutions that are embedding the ERA Code of Conduct.

Pillar 4: Targeted Training and Awareness-raising Initiatives

Outcome 9: Student education and training

In their education and training initiatives, HEIs include awareness-raising activities to enable all enrolling students to create and uphold a respectful, safe and supportive community.

It is evident from the Expert Group consultations as well as the annual reports to the HEA that SVH training initiatives are commonplace in Irish HEIs. All institutions offer training to both students and staff, mainly focusing on awareness, consent and the roles of bystanders in different respects. Another important topic in training is information on disclosure, especially to specific target groups. The Expert Group observes that there is well developed collaboration between Irish HEIs. It was suggested to the Expert Group on several occasions to broaden the scope of these initiatives to a more systemic framework, preferably building on the experiences from the Active*Consent Programme[40] and the UCC Bystander Intervention Programme.[41] This way, a more standardised approach would be made possible, and this in turn can make it more possible and fruitful to monitor and evaluate the effects of training in all Irish HEIs in the future.

Research from the US context demonstrates that certain evidence-based active bystander programmes have shown success in reducing SVH rates on university campuses.[42] Building on the considerable work by the sector to date, the Expert Group suggests a standardised approach to bystander training is embedded in all Irish HEIs in a revised Framework. The Expert Group find it especially important for training to be an integrated part of student induction and should be required for all students newly enrolled within an HEI, which includes first year master students, first year PhD students, Erasmus

[40] https://www.consenthub.ie/ [accessed 5 November 2025]
[41] https://www.ucc.ie/en/bystander/ [accessed 5 November 2025]
[42] Coker, A. L. et al. (2016). Multi-College Bystander Intervention Evaluation for Violence Prevention. American Journal of Preventive Medicine, 50, 295-302. https://doi.org/10.1016/j.amepre.2015.08.034 Coker, A. L. et al. (2015). Evaluation of the Green Dot Bystander Intervention to Reduce Interpersonal Violence Among College Students Across Three Campuses. Violence Against Women, 21, 1507-1527. https://doi.org/10.1177/1077801214545284

students, international students, as well as first year undergraduate students. In embedding a more standardised approach across all Irish HEIs it is key for the HEA to continue to support initiatives on bystander training, and structural initiatives supporting cross-institutional collaboration, documentation and development. In line with the focus on student and survivor voice throughout this report, such work should continue to draw on the perspectives of survivors that represent the diversity of the student population in Irish higher education. The Expert Group advises the HEA to endeavour to retain the current priority training areas in the 2019 Framework (consent, bystander, and disclosure), preferably also including information and training on image-based sexual abuse, online abuse and other emerging areas. The Expert Group suggests a training target to be at least 80% of newly enrolled students in each HEI and systematic data collection on outcomes and learning in HEIs to support impact and collecting good practice at national level.

Alongside these training programmes, there are significant gains to be made from embedding ESVH and related subject material within relevant curriculum areas in higher education. This work has multiple benefits. For example, it can also enhance the role of student and survivor voice within HEIs by enabling students and survivors who are enrolled on relevant programmes/modules to gain expertise and feed into institutional work in this area. It can ensure that whole cohorts of students are engaged and committed to ESVH, bolstering other programmes such as bystander training. It also enables graduates from HE to take their skills and expertise in this area into other domains and professions, supporting greater awareness and expertise of SVH for social transformation more widely.

To recognise the importance of this work, the Expert Group have added a national priority action area to support and enable the sharing of good practice around ESVH in the curriculum between HEIs, as outlined further below.

Outcome 10: Staff training

Staff participate in training and awareness-raising activities to enable them to create and uphold a respectful, safe and supportive community. Staff also receive training in responding to disclosures and signposting to the right support. Those staff working in student support, counselling and applicable/relevant HR roles receive the essential specialist training appropriate to their roles.

As noted earlier in this report, considerable work has been done in relation to staff training since the publication of the 2019 Framework and the Implementation Plan. However, as stated in Outcome 5, managing risk to reporting parties and to the wider/student staff body is a complex area and continues to need institutional attention. Many of those who experience SVH may never report or disclose it to

anyone. Reporting may be delayed for either a brief or lengthy period. Even where designated services are in place, those who do report may not first report to those designated or formal structures. Rather they may disclose to a friend or a trusted authority figure.[43]

Therefore, it is important that staff in HEIs, regardless of their roles, are trained to understand the impact of SVH and the reporting and support channels available in their HEI so that, if necessary, they can respond in a trauma-informed way that correctly supports and directs the person disclosing, while also empowering the staff member involved to receive a disclosure. Such training would also build awareness to ensure that staff are clear on their responsibility for their own standards of behaviour.

In addition, staff management structures, including managerial oversight, should ensure that there is adequate supervision and staff support in the management of disclosures or reports of SVH.

While each institution is expected to aim for 100% of staff to be trained, the Expert Group suggest training is accomplished over the lifetime of the revised Framework for at least 80% of staff in each HEI and systematic data collection on outcomes and learning to support impact and collecting best practice at national level is established.

Specialist training courses should be devised either by or in conjunction with those who are expert in training in this area and draw on the perspectives of survivors that represent the diversity of the student/staff population in higher education. The Expert Group have identified the development of such training as a national priority action (see below) suggesting that the HEA support and enable collaboration across and outside the sector to develop such specialist staff training.

This training should be undertaken by all personnel within services that are particularly engaged with supporting those who report SVH. This includes those working in the HEI in specialist SVH services, welfare staff in student and staff services, general student counsellors and HR personnel. Staff involved in decision-making and investigations relating to SVH complaints and disciplinary processes should also take part in specialist training. It may also include personnel in senior management offices, who are responsible for ensuring the outcomes of the 2019 Framework strategy. This training should be essential for such staff, ideally within three months of their appointment to their role. It should ensure that such staff gain adequate skills and knowledge to offer relevant supports for survivor care as well as to support those who are engaging in the complaints systems. Such training should be repeated at least

[43] Surveys conducted in 2022 by the Central Statistics Office (CSO) demonstrate that 53% of adults never disclose. F 53%, M 34%, better rates if perpetrator is a non-partner. CSO 2022, 'Sexual Violence Survey 2022 – Main Results'. https://www.cso.ie/en/statistics/crimeandjustice/sexualviolencesurvey/sexualviolencesurvey2022mainresults/ [accessed 5 November 2025]

once every three years and should be certified as part of their HR records.

In addition to building an appropriate system to receive disclosures of SVH, such training will ideally encourage a wider empathy and knowledge of the impact of SVH and help strengthen the required culture of zero-tolerance of such behaviour.

Outcome 11: Communications and campaigns

HEIs use ongoing messaging to disseminate information consistent with the Framework aims for cultural change and awareness.

It is clear from this review, especially in engagement with stakeholders, that since the 2019 Framework and Implementation Plan were put in place, students and staff in HEIs are generally better informed on the general theme of zero tolerance of SVH. Their information has come from leadership and specialist functions highlighting the issue, from messaging campaigns at individual institutions and national level, through the provision of workshops and supports and engagement with the SVH Prevention and Response Managers and through highlighting the Speak Out tool and other supports.

Embedding a clear understanding of a safe, respectful and positive campus where sexual violence and harassment is not tolerated is an ongoing project and must be supported by ongoing reminders and awareness raising. This is not yet uniformly well understood throughout HEIs. Effective messaging is most evident where it is well supported by institutional leadership and policies and where messages are pro-active, consistent and part of the regular behaviour of the institution. In the development and review of such messaging, as with all other areas of this report, diverse victims' and survivors' perspectives should be drawn on to ensure that communications are appropriate and sensitive.[44]

Outcome 12: Evaluating effectiveness

HEIs create and implement systems for measuring effectiveness of the implementation of the revised ESVH framework and its initiatives within their HEI.

The Expert Group considers that setting up a formal monitoring and evaluation system is vital for the forthcoming iteration of the Framework. The review and consultations that the Expert Group carried out suggest a lack of systematic monitoring of the implementation of the 2019 Framework within HEIs.

[44] Dickinson, J., & Blake, S. (2022). How to involve students in work on gender-based violence. In C. J. Humphreys & G. J. Towl (Eds.), Stopping Gender-based Violence in Higher Education: Policy, Practice, and Partnerships (pp. 104–117). Routledge.

There are, as yet, no indicators or other measures in place to measure the effectiveness of different aspects of its implementation. A promising campus climate measure that has already been piloted in Ireland is the COSHARE survey of higher education staff members in Northern Ireland and Ireland, in particular the material relating to perceptions, attitudes and knowledge of campus culture and climate.[45]

One option for this work is to build on existing quality assurance (QA) systems, with their logic of self-evaluation, as the baseline impetus for a monitoring and evaluation framework. This way, commitment from institutions is guaranteed and monitoring of the actual self-evaluation is preferred as a mechanism of support to institutions for further implementation of the 2019 Framework (and not as a control mechanism). However, the current QA framework in Ireland is outside of the remit of the HEA.

Therefore, the Expert Group recommends that HEIs, in their annual reports to the HEA, describe how they evaluate the effectiveness of ESVH work, reporting on:

- how the Framework has changed their institutional culture
- how the HEI is embedding the Framework into their existing QA processes (for example, HEIs may be embedding ESVH into self-assessment processes such as Athena Swan or the QQI quality assurance framework)

At the same time, a national priority action recommended for the HEA is to convene a working group to examine mechanisms and processes for measuring the effectiveness of ESVH work within HEIs, and to support good practice in embedding such systems within existing institutional processes wherever possible.

Over the course of the revised Framework implementation period, the HEA should endeavour to monitor the development of systems for measuring effectiveness and, if needed, lead further scoping and a national conversation around how such monitoring could be better embedded in QA processes.

[45] Lagdon, S., Anyadike-Danes, N., Burke, L., Burns, C. R., McBrearty, L., & MacNeela, P. (2024). The COSHARE campus climate survey of Higher Education staff members in Northern Ireland and the Republic of Ireland.: Consent, Sexual Violence, Harassment and Equality Education. https://www.consenthub.ie/research/coshare-north-south-survey-report-2024/ [accessed 5 November 2025]

Priority areas for sectoral action to address SVH in higher education

The Expert Group were asked to identify 3-5 priority areas for sectoral action that could be used to support the next phase of the Framework.

1. **Safety measures and risk assessment**

As noted above in Outcome 7, there is a need for more expertise and shared resources around safety measures and risk assessments when SVH is disclosed to the HEI. To address this, the HEA should endeavour to commission a report outlining promising directions and practices at national level relating to safety measures (including interim and precautionary measures as defined above) for both staff and students, drawing on the specialist expertise of the organisations working with SVH victims/survivors on effective approaches as well as international good practice within higher education. This should include a review of risk assessment tools and approaches that can be used by HEIs, with recommendations for appropriate tools and approaches, including identifying any training needs for staff carrying out such assessments and recommending steps to develop or access such training.

2. **Explore options for safer recruitment**

As noted in Outcome 8, in line with the ERA Code of Conduct recommendation for introducing measures to prevent multi-site serial misconduct, the Expert Group recommends that the HEA should endeavour to convene a working group of HR representatives from the sector to review good practice in relation to safer staff recruitment and suggest processes for self-evaluation of recruitment processes in HEIs. This review will draw on reporting from HEIs about current practices in relation to safer recruitment processes. This priority action will support the development of shared, sector-wide mechanisms for safer staff recruitment by the end of the revised Framework period.

3. **Develop tools to measure the effectiveness of ESVH work and embed it into existing institutional processes**

To support Outcome 12, the Expert Group recommends that the HEA should endeavour to convene a working group to examine and report on mechanisms and processes for measuring the effectiveness of ESVH work within HEIs, and to support good practice in embedding such systems within existing institutional processes wherever possible. The Expert Group suggest that representation from existing

quality assurance and equalities frameworks such as QQI and Athena Swan Ireland are involved in this working group.

4. **Support and enable collaboration across and outside the sector to develop specialist staff training**

As noted in Outcome 10, specialist training courses, devised either by or in conjunction with those who are expert in training in this area, should be undertaken by all personnel within services that are particularly engaged with supporting those who report SVH.

To support the development of such specialist staff training, the Expert Group recommend a priority area for national action for the HEA is to support HEIs to collaborate on the development of specialist staff training. HEIs should partner with external organisations with relevant expertise to develop such training as well as drawing on the perspectives of survivors that represent the diversity of the student/staff population in higher education.

Specialist staff training developed with the support of the HEA, where possible, should be made available to HEIs across the sector, beyond those involved in developing it.

5. **Support and enable the sharing of good practice around ESVH in the curriculum between HEIs**

Outcome 9 highlights the importance of embedding ESVH within the curriculum where this is relevant. In order to amplify and expand the existing good practice that is occurring in this area, the Expert Group have highlighted this as a priority action area. This could be achieved through collaboration with the HEA Teaching and Learning Unit to establish a knowledge repository of good practice and to hold an event to share good practice in this area.

Appendix 1 – Expert Group Terms of Reference

The Centre of Excellence will undertake desk-based research to provide the Expert Group with briefing on the progress made by HEIs in relation to the 15 outcomes of the current 2019 Framework, progress relating to the ESVH Implementation Plan 2022 -2025 and the reports of the National Surveys of Staff and Student Experiences of Sexual Violence and Harassment in Irish HEIs.

It is intended that the Expert Group will meet with a cross-section of HEI and non-HEI stakeholders, including but not limited to the ESVH Advisory Group, ESVH Practitioner Network and National Committee for EDI. Feedback will be captured from staff and students on progress in relation to addressing ESVH in HEIs. For those unable to attend a consultation, written submissions will be facilitated.

It is acknowledged that HEIs need sufficient time and resources to embed actions and mainstream this important work to tackle SVH. New roles are recently in placed in a number of HEIs -16 HEIs have appointed Sexual Violence Prevention and Response personnel over the course of 2023-2024. As such, it is not envisaged that updates to the Framework would change the focus of the work by HEIs, rather the review would provide an opportunity to reflect on the current expected outcomes and national level actions to ensure that these are sustainable and can be measured effectively.

The Expert Group will consider all material provided and make recommendations for an updated 2019 Framework. The Expert Group will then prepare a final report with the support of the secretariat (provided by the Centre of Excellence).

The Expert Group will undertake the review of the 2019 Framework having regard to:

- Relevant academic publications on the topic (e.g. relevant UniSAFE and GenderSAFE and GENDERACTIONplus project reports).
- Relevant national and European Commission policy related documents (e.g. Third National Strategy for DSGBV, EU Zero Tolerance Code of Conduct, Istanbul Convention).
- Sectoral Reports on HEI Progress against the Framework Outcomes.
- Progress achieved in relation to the HEA ESVH Implementation Plan (2022-2025)
- Reports of the National Surveys of Staff and Student Experiences of Sexual Violence and Harassment in Irish HEIs.
- Other submissions and inputs received.
- Meetings with stakeholders.

The Expert Group will report to the HEA on its conclusions and, specifically, will:

- Make high-level recommendations as to how, in the view of the Expert Group, the existing ESVH Framework could be updated and renewed, while retaining the current focus on prevention and response
- Review progress made in the sector since the introduction of the Framework and the ESVH Implementation Plan
- Identify 3-5 priority areas for sectoral action to address ESVH in higher education.

A minimum of 3 Expert Group members is required for a quorum.

Appendix 2 – Expert Group Membership

Noeline Blackwell is a human rights lawyer and campaigner. She has worked on victims' rights, domestic, sexual and gender-based violence, immigration rights and access to justice and has also worked as a solicitor in general practice. She currently works on children's online safety rights with the Children's Rights Alliance as well as on independent research and consultancy. She is a member of the Irish Human Rights and Equality Commission and of the Press Council. She is an Adjunct Full Professor at the School of Law, University College Dublin. She chairs the Independent Patient Safety Council and the Child Law Project and is a director of the Open Doors Initiative.

Dr Anna Bull is a Senior Lecturer in Education and Social Justice at the University of York, UK, and a director of The 1752 Group, a research and campaign group addressing sexual misconduct in higher education. She has published a range of reports and academic and non-academic articles on gender-based violence in higher education and is a regular media expert commentator on this issue. She has worked in partnership with organisations such as the UK's National Union of Students and the UK Council for Graduate Education and is currently leading a circle of practice for HEIs across Europe with European Commission-funded programme GenderSAFE.

Fredrik Löfström Bondestam is an Associate Professor in Sociology at Uppsala University and the Director of the Swedish Secretariat for Gender Research at the University of Gothenburg. His research covers organizational change in higher education and research, feminist pedagogy, gender-based violence and harassment, risk and masculinities, and gender mainstreaming in theory and practice. Fredrik has managed government assignments on gender mainstreaming in Sweden (2013-2017) and has participated in several EU-funded Horizon2020 and Horizon Europe projects on gender-based violence in the ERA (UniSAFE, GENDERACTIONplus and GenderSAFE).

Tony McMahon is Associate Director HR & EDI with the Irish Universities Association (IUA) where he provides sectoral leadership and advice on Equality, Diversity & Inclusion and HR activities. Working closely with the IUA Human Resources Directors Group (HRDG) and the Vice-Presidents Equality, Diversity & Inclusion Group (VPEDI), Tony represents IUA universities externally and is a member of a number of higher education sector committees including the HEA ESVH Advisory Group, the HEA National EDI Committee, the Speak Out Governance and Oversight Committee, and the Athena Swan National Committee. Tony has a professional background in Human Resources and has held Director of Human Resources positions in a number of public bodies, including Trinity College Dublin, where he also held the role of Director of Diversity and Inclusion.

Appendix 3 – Consultations with stakeholders

A total of 61 participants took part in consultation across 6 sessions between February and April 2025.

- Consultations were held with existing HEA groups and networks:
- HEI Sexual Violence Prevention and Response Managers (16 participants)
- HEA ESVH Advisory Group (9 participants)
- HEA National Committee for EDI (13 participants)

A consultation session for students was attended by 12 students from 5 institutions. Students were recruited with the assistance of the SVH Prevention and Response Managers or equivalent role in each HEI. To ensure representation from postgraduate students the Chair of the Expert Group also invited postgraduate researchers via staff in leadership roles supporting graduate students within Irish higher education. HEI representative bodies (IUA and THEA) assisted with recruitment of participants for the Staff Trade Unions consultation session (6 participants) and Human Resources/Employee Relations consultation session (5 participants).

Key feedback emerging from the consultation sessions has been grouped under headings below.

Institutional culture, resourcing and engagement with the Framework

- Institutional culture change continues to be vital in relation to ending sexual violence and harassment.
- The ESVH Framework was initially implemented through HEI EDI units, Student Services, and Healthy Campus, but there is a need for greater buy-in from other departments/units across institutions to embed a whole of institution approach.
- The Framework has been successful in reaching first year students, but further work is needed in relation to reaching staff and other student cohorts, particularly young men.
- While the funding for Sexual Violence Prevention and Response Manager roles in eligible HEIs was welcomed, the sustainability of the workload for role holders is challenging. Greater clarity on the key objectives of this role would be welcome. HEIs that are not eligible for this funding do not have an equivalent role in place.
- While there can be strong engagement from senior management on ESVH, further engagement is required with middle management to ensure that they understand their own responsibility in relation to supporting staff and students.
- While it appears that Initiatives like Athena Swan Ireland have been successfully knitted into the sector, ESVH does not appear to have been embedded to the same extent.
- More financial support from the Government would be welcome as it is noted that that

institutional resources for ESVH do not appear comparable to resources for mental health or other areas.
- There is a role for students in the co-creation and delivery of training and in institutional working groups to ensure the student voice is included. Students should be paid for their time as there is an expectation of volunteering.

Institutional policies and reporting systems

- A trauma informed approach should be embedded in all HEI ESVH policies.
- While an increase in formal reporting is expected and highlights the success of awareness raising, this can lead to a backlog of reports. On the other hand, where there is a low number of formal complaints, this can be seen as a reflection of a low number of incidences rather than a lack of trust or lack of awareness of the policy.
- Where there is an increase in reporting, there is a need to manage expectations of what the HEI can act on, especially in response to informal reports.
- To build greater trust in institutional policies, there is a need for greater transparency in policy implementation including the outcomes of institutional processes.
- Policy documents are comprehensive in nature, but there is a need for readily available, easy to follow procedures and clear signposting to supports. Key aspects such as reporting pathways and supports available could be highlighted to help guide those who need to use or understand the policies.
- There are challenges in collecting feedback to guide process improvements, particularly where informal reports do not progress to a formal complaint.

Terminology and scope of the Framework

- It is important to include staff in the Framework, as well as students.
- The inclusion of sexual violence in the Framework is important to ensure that experiences are not downplayed but to also ensure that students can understand their own experiences.
- It is also important to include all levels of harassment for the same reason; that students and staff can understand their own experiences of harassment as not acceptable.
- Training and awareness raising is crucial in understanding this terminology.

Training and awareness raising

- There is a need for increased awareness raising activities for students and staff.
- Training is seen as critical as many people in the sector do not have the specialist skills to address a report of SVH appropriately. While other types of training can be made

mandatory (e.g. health and safety or cybersecurity), ESVH training is not mandatory. It was acknowledged that making training mandatory is a difficult process.

- There is a need for institutions to take ownership, set the culture from the outset, and create an expectation of training. Where there is pushback or a lack of uptake of training, there is a need for institutions to emphasise the purpose and importance of training for staff and students.
- There is an opportunity to embed SVH training into the curriculum, but this is a challenge for students who already have heavy workloads.