

The University of Manchester: Tackling Harassment & Sexual Misconduct

Background

Following the release of the Office for Students' [Statement of Expectations on Tackling Harassment and Sexual Misconduct](#) in April 2021, the University did a preliminary review of our standards against those outlined within the recommendations. We found areas of great practice, and also some areas for further development. We identified a need to improve our offering, above and beyond what exists.

Additionally, in June 2021, student group "Resist Rape Culture" launched a survey of the student body to examine student perceptions of rape culture and sexual misconduct, and student experiences whilst at The University of Manchester. The University have kept an open conversation running with the group, and the final report for this was released in October 2021, containing 11 recommendations for the University based on student responses.

In July 2021, a taskforce made up of staff from across the University and Students' Union, and Students' Union officers was convened to examine the OfS recommendations in more detail and produce an action plan to improve our approach to Tackling Harassment and Sexual Misconduct. In October 2021, the taskforce also agreed to consider the recommendations which have come from the student survey, so that we are ensuring any changes reflect what is needed on a local level, as well as to meet a national 'norm'.

Office for Students' Recommendations

The Office for Students (OfS) recommendations broadly cover seven areas that Universities should address to improve their approach to Tackling Harassment and Sexual Misconduct. Under each recommendation are between two to six actions to complete to consider that recommendation 'completed'. The seven recommendations in summary state that:

- ❖ Universities should focus on communicating and embedding the approach to tackling harassment and sexual misconduct across the University
- ❖ The governing body should ensure the approach to tackling harassment and sexual misconduct is adequate and effective
- ❖ Students should be engaged and involved in developing and evaluating systems
- ❖ Training needs should be assessed, and there should be implementation of relevant awareness and prevention training across the University, for staff and students
- ❖ There should be adequate and effective policies and processes in place to disclose any form of harassment or sexual misconduct
- ❖ There should be a fair, clear and accessible approach to taking action on disclosures
- ❖ There should be access to appropriate effective support for all students involved in investigations

Resist Rape Culture's Recommendations

Resist Rape Culture have compiled their recommendations based on responses to the survey of the student body undertaken in Summer 2021. There are 11 recommendations in total for the University to consider and action where possible. These are:

1. Compulsory consent classes for all students regardless of entry level, and education and awareness on rape culture and sexual violence
2. Training for students on how to report using the University system
3. Anonymous, confidential and a clearer, easier to use reporting system
4. Training on how to be an active by-stander and what to do if witnessing harassment or assault
5. "Harsher" consequences for perpetrators of sexual violence, a zero-tolerance approach
6. A 24-hour safeguarding and mental health team/officer on campus
7. More street lighting around campus, especially Fallowfield
8. More women security guards
9. Clear access to support and more support for students. Along with making students aware of the sexual violence response team
10. Nightclub representatives and a bouncer union to join or have close relations to SVANS¹
11. Training for the Student's Union officers in taking reports of assault.

Our Commitments

Based on the OfS recommendations and actions, and RRC recommendations, we have identified several commitments that we as an institution intend to have upheld by the end of the year 2022.

By December 2022, The University of Manchester commits to:

- ❖ Having clear governance oversight of the prevalence of harassment and sexual misconduct at the University of Manchester, and our approach to tackling it.
- ❖ Having an embedded communication strategy for students, staff and visitors, clearly outlining expected behaviour standards, the reporting process and the disciplinary process applied for not upholding our values.
- ❖ Producing transparent guidance on how all cases are handled, including what information is shared with the different parties involved.
- ❖ Recruiting students as integral members of the taskforce, ensuring student opinion is embedded within the decision-making process.
- ❖ Introducing broader and mandatory training modules for staff and students, particularly for staff in student-facing roles and student leaders on areas such as consent and being an active bystander.
- ❖ Reviewing our current policy suite to ensure it is up-to-date and fit for purpose in tackling harassment and sexual misconduct, including exploring current guidance on sharing outcomes of disciplinary processes.
- ❖ Acknowledging and minimizing any barriers that exist for particular groups of students to receiving support, and regularly reviewing to ensure we give opportunity for students and staff to feed back any issues with the current systems in place.

In order to achieve these, there are 13 priorities that we have identified to complete within the same time period. These are outlined below.

¹ SVANS – Sexual Violence Action Network for Students; a collaborative group for all local Universities & services

Our Priorities

We have thirteen clear actions to complete before December 2022. Each action has been assigned a lead staff member, with link staff identified to support as needed. Each action will be assessed to meet specific outcomes, and will obtain final sign off by the taskforce once completed.

We are clear that completing these actions will not be the conclusion of our work in tackling harassment and misconduct. There are still a number of other recommended actions presented by the Office for Students and Resist Rape Culture for us to examine, but the taskforce agreed that those listed below should be the priority to improve our current practice.

Priority 1: Identify members of Senior Leadership to champion the changes implemented to improve our approach to tackling harassment and sexual misconduct.	
Relevant recommendations:	OfS Recommendations 1 & 2
Description: To ensure that we have clear senior leadership commitment and governance lines, the taskforce agree that we should source one or more individuals from the Board of Governors to champion the work of the taskforce and be invited to attend relevant meetings as we progress. A member of the taskforce was actioned to contact members of senior leadership to enquire, and Adèle Mackinlay (Director of People and Organisational Development) was identified as a leader with interest in this work, who has agreed to act as sponsor for the group. In addition, Simon Merrywest (Director for Student Experience), Banji Adewumi (Director of Equality, Diversity and Inclusion), and Melody Stephen (General Secretary of the Students' Union) are involved directly with the taskforce.	
Estimated Timeframe:	Month 1 (Sept-Oct 2021)

Priority 2: Develop a communications plan to inform staff and students about harassment & sexual misconduct, and the University's stance on this.	
Relevant recommendations:	OfS Recommendations 1, 5 and 7. RRC Recommendations 2, 3 and 9.
Description: The taskforce identified that much of our current good practice is known on only a limited basis, and that clearer communications may help with transparency and confidence in the services that already exist and open up the opportunity for feedback on where we can improve. The Advice & Response team have met with the student and staff communications teams and are in the process of planning a clear communications strategy to promote several areas, including: - What are acceptable and unacceptable behaviours	

<ul style="list-style-type: none"> - How to disclose incidents to the University through Report & Support - What support is available to all parties - A 'behind the curtain' view of the complaints & disciplinary process. - How staff can refer cases with details or anonymously via Report & Support 	
Estimated Timeframe:	Semester 1 (Sept 2021-Jan 2022)

Priority 3: Clear protocols on how prevalence data is shared with the Board of Governors	
Relevant recommendations:	OfS Recommendation 2
<p>Description:</p> <p>The taskforce drafted the current reporting routes for prevalence data across the University, and noted that there were some areas for development, to ensure clearer prevalence data reaches senior leadership, due to several streams of information feeding through different routes.</p> <p>The group agreed that a clear map should be produced showing which University groups and committees receive data, from whom, and how this is compiled to show a clear image of unacceptable behaviour at the University.</p>	
Estimated Timeframe:	Semester 1 (Sept 2021-Jan 2022)

Priority 4: Review data streams available on prevalence of incidents, including those which have gone to disciplinary	
Relevant recommendations:	OfS Recommendation 2
<p>Description:</p> <p>In follow up to Priority 3, the taskforce agreed that we needed a clearer understanding of what data is currently available for reporting on prevalence of incidents, in order to make recommendations on how we can improve the reporting and examine intersectionality.</p> <p>The various teams who hold data should aim to compile a clear list of data currently available on disclosures, formal reporting and cases which proceed through conduct and discipline routes.</p> <p>Feedback should also be sought from the Board of Governors and committees on what data they do not currently receive that would enable them to gain a better understanding of prevalence of harassment and sexual misconduct in order to satisfy themselves that risks are effectively mitigated.</p>	
Estimated Timeframe:	Semester 2 (February-June 2022)

Priority 5: Recruitment of paid student members as partners on the improvement of current systems for tackling harassment and sexual misconduct	
Relevant recommendations:	OfS Recommendation 3
Description:	

It is vital to ensure student partnership in any changes made to the current system for tackling harassment and sexual misconduct.

We recommend that appropriate structures should be set up for inclusion of students as partners in the decision making on any changes or improvements to current systems, including proactive approaches to tackling harassment and sexual misconduct. Discussions should be completed to decide the full remit for the roles, the expected commitment by the student(s) to any partnership work, and any other necessary requirements. Promotion of the positions should then be completed with input from the student comms team and Students' Union.

It is noted that any student representation is in addition to members of the Students' Union executive officer team, allowing a fuller representation of students by elected officers and paid representatives. This model has been used effectively in practice within the Sexual Violence Action Network for Students (SVANS); a Greater Manchester collective group which brings together Universities, Students' Unions, students and local services to address sexual violence.

The taskforce will also actively encourage the recruitment of either Students' Union officers, or self-nominated students to other groups overseeing amendments or introduction of policy, regulation or other significant change at the University. Recent examples of this in practice include the Safeguarding Advisory Group and the Personal Relationships Policy working group.

Estimated Timeframe:	Semester 1 (Sept 2021-Jan 2022)
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Priority 6: Inclusion of proactive modules within the Unitu training on the topics of Harassment and Sexual Misconduct

Relevant recommendations:	OfS Recommendation 3 RRC Recommendation 2, 4, 9
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Description:

The taskforce considered that there is an excellent opportunity to support student leaders on the ground with a strong insight in the areas of harassment and sexual misconduct, supporting them in their awareness on these topics and understanding how to signpost their peers. They span the entirety of the University, and we have the opportunity to reach them through their existing training.

Unitu is a program being currently piloted, which may offer the opportunity for us to integrate relevant training in the areas of harassment and sexual misconduct to all student leaders, therefore allowing us a greater reach into the student community.

Additionally, the taskforce recommend that we develop a Qualities, Practices and Values training package as part of WIT (Welcome, Induction and Transition) for all students.

Estimated Timeframe:	Start of Academic Year 2022/23
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Priority 7: Delivery of Qualification-level training to investigators and panel members to ensure specialist handling of cases on the topics of harassment and sexual misconduct

Relevant recommendations:	OfS Recommendation 4
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Description:

Both the taskforce and the SCDC subcommittee had identified areas of staff development in completing investigations and chairing University disciplinary panels where cases were on the topics of harassment and sexual misconduct.

Advice & Response have identified an external provider, Intersol Global to provide bespoke training to a selection of staff most involved in investigating cases of harassment and sexual misconduct, or chairing any subsequent disciplinary panels, with a focus on complex and sensitive cases that are seen.

Estimated Timeframe:	December 2021
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Priority 8: Introduction of Consent and Active Bystander training to staff and students

Relevant recommendations:	OfS Recommendation 4 RRC Recommendations 1, 2, 4 and 11.
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Description:

There was an identified need to improve our proactive training options, for both students and staff. Based on the recommendations, and student feedback, consent training and active bystander training stand out as two key areas of training that we should look to develop in.

Consent and active bystander training hold high value in taking proactive steps to tackle harassment and sexual misconduct *before* any incidents occur. Consent training in particular allows us to ensure that all students are clear on the University's expectations of behaviour when it comes to personal and sexual relationships and how we would define non-consensual activity, should a formal complaint be raised.

Advice and Response, and Equality, Diversity and Inclusion (EDI) will be responsible for the two training courses as they are developed.

Consent training has been launched in Autumn 2021 on a voluntary basis, but discussions with senior leadership will continue into whether the course can be made mandatory from September 2022. Active Bystander training was piloted with staff in the academic year 2020/21, and the EDI team have committed to producing the training as part of their interim 12-month EDI strategy, meaning it should be in place by late 2022.

Estimated Timeframe:	Beginning of academic year 2022/23
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Priority 9: Create and distribute easy-to-understand physical and digital guidance resources for staff and students on reporting and Conduct and Discipline processes

Relevant recommendations:	OfS Recommendations 5 and 6. RRC Recommendations 2, 5, and 11.
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Description:

Resources should clearly provide easy-to-understand information for reporting and respondent students, and staff involved in cases relating to harassment and sexual misconduct.

This should include:

- How members of the University community can report an incident to us
- How to seek support and advice
- How a student disclosure should be handled
- How a report or referral is made
- Clear flowcharts on the Conduct and Discipline processes (assessment, Summary disciplinary panel, University disciplinary panel)
- What the potential outcomes of disciplinary processes are

Resources should be available in digital written form, but other media forms will be considered.

Estimated Timeframe:	Summer 2022
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Priority 10: Use recent research to understand and minimize barriers to reporting and disclosing incidents that exist for particular groups of students, with regular further review.

Relevant recommendations:	OfS Recommendation 5
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Description:

The taskforce is aware that while we are addressing the prominent areas that have been identified nationally by OfS, this might not address all barriers that University of Manchester students in particular face.

We therefore agree that it is a priority to address any barriers that specific student groups are facing in accessing relevant University support services, and to use in the first instance the research which exists to identify these barriers. The group has highlighted initially the Resist Rape Culture survey and focus group research held into barriers to accessing all support services by students from a minority ethnic background.

Furthermore, the University will use follow up opportunities to identify any other barriers that may not be immediately apparent, including follow up surveying of students who have interacted with the conduct and discipline processes or support services, and working closely with the Students' Union where appropriate on wider student research.

Estimated Timeframe:	Summer 2022
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Priority 11: Clearly demonstrate how we ensure panel hearings are free of reasonable perception of bias, including training and student representation.

Relevant recommendations:	OfS Recommendation 6 RRC Recommendation 5
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Description:

The taskforce believe that our panels are currently balanced and free of reasonable perception of bias, however we cannot clearly demonstrate this in a manner which is currently tracked and monitored.

Panel chairs and members are given in-house training on areas such as harassment, sexual misconduct and hate to ensure appropriate questioning and trauma-informed practice within panels, however there is a significant assessment of current membership and potential changeover in membership occurring soon and so new training needs will need to be assessed.

To ensure we can clearly demonstrate that panel hearings are free of reasonable perception of bias, we will be taking the following actions:

- Panel members will complete external bespoke training on how to conduct themselves as a panel member, including in sensitive cases
- Panel chairs will complete additional external training specific to their role as chair, in handling sensitive questioning and chairing difficult conversations.
- A clear tracker will monitor diversity within the make-up of panels, and training received by the members of the panels.
- We will seek to encourage recruitment of a wider diversity of panel members.
- Outcomes of panel hearings will be tracked and assessed within data reporting and reviews.

Debrief meetings will be used following complex and sensitive cases to discuss best practice and areas for development.

Estimated Timeframe:	Semester 2 (February-June 2022)
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Priority 12: Review our internal policies and processes in relation to tackling harassment and sexual misconduct, to ensure they are clear and consistent

Relevant recommendations:	OfS Recommendation 7 RRC Recommendations 3 and 5
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Description:

The taskforce agreed that as the development and addition of new policies and procedures has come over time, they can sometimes be less clear when complex cases are escalated through relevant complaints or disciplinary processes.

This causes difficulties for both students and staff when navigating the suite of policies and procedures that may be applicable in any singular situation. While some work has and is being done to make these steps clearer, it remains true that amendments could be beneficial to simplifying the overall process, leading to greater transparency and increased faith in the systems.

The University are exploring a new fixed term position to review our internal policies and procedures which will focus primarily on the Conduct and Discipline suite, and the Dignity At Work and Study and relevant Equality, Diversity and Inclusion policies and procedures to create a clearer 'golden thread' when it comes to all unacceptable behaviours.

Estimated Timeframe:	Beginning of Academic year 2022/23
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Priority 13: Explore current processes on outcome sharing with complainants; what information can be shared with whom, including if an outcome changes

Relevant recommendations:	OfS Recommendation 7 RRC Recommendations 5 and 9
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Description:

The taskforce agreed that improving the University's transparency when it comes to tackling harassment and sexual misconduct is integral to our members having more confidence in the process.

An area that has come under recent national consideration is what outcomes are shared with who, and how much is shared. There is no clear national guidance on this at this stage, however

the taskforce agreed that we do have the potential to look into our current practices of outcome sharing and see if there is any more that we can do.

Current practice is that outcome sharing is decided on a case-by-case basis; where there is a clear safeguarding basis for sharing a full or partial outcome, this is considered and approval is given to share the outcome with the complainant or affected parties. This could include, for example, a case involving a violent act where the outcome is that the person has been suspended or their studies have been terminated, and so the respondent will no longer have a justifiable reason to attend on campus. At this stage there is a clear interest in notifying the complainant of this outcome.

Initial exploration should include researching other higher education institutions to examine their practice, exploring outcome sharing, and considering the legal implications of variations to the decision making, comparing to guidance nationally (when produced).

Estimated Timeframe:	Summer 2022
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