

Evaluation of the Office for Students' Statement of Expectations: Preventing and Addressing Harassment and Sexual Misconduct

Update June 2022

About the evaluation

In April 2021 the Office for Students (OfS) published a statement of expectations¹ to provide a clear framework for colleges and universities (providers) in preventing and responding to incidents of harassment and sexual misconduct that affect their students. Providers were invited to review and update their systems, policies and processes during the 2021-22 academic year.²

The OfS has commissioned SUMS Consulting to evaluate the initial impact of the publication of the statement of expectations, including by:

- a) examining how universities and colleges have responded to the publication of the statement of expectations
- b) hearing from students and students' unions to understand whether things are changing for the better
- c) considering whether further change in this area may be needed.

We are looking to understand how and in what ways the statement of expectations has changed provider approaches to harassment and sexual misconduct and its impact on three key areas:

- student experiences
- student outcomes such as disclosures and cases
- provider behaviour and policy change.

The evaluation is taking place between March and September 2022. SUMS will prepare updates about the evaluation and two reports (in summer and autumn 2022), which will be published on the OfS's website.

This paper provides an overview of progress to date, the broader context for the evaluation, some emerging findings from research with students and their representatives, and next steps in the process.

What we have done so far

Research and information gathering for the evaluation is underway. So far, our activities have included:

- reviewing multiple documents, reports, articles and other data sources about this topic
- surveying a sample of 100 providers of different types, sizes and locations to consider the effect of the statement of expectations on their approaches to preventing and responding to harassment

¹ See www.officeforstudents.org.uk/advice-and-guidance/student-wellbeing-and-protection/prevent-and-address-harassment-and-sexual-misconduct/statement-of-expectations/

² See www.officeforstudents.org.uk/publications/letter-about-the-statement-of-expectations-for-preventing-and-addressing-harassment-and-sexual-misconduct/

and sexual misconduct to date (the survey received a 70% response rate and analysis of the results is in progress)

- holding qualitative interviews and focus groups with students and their representatives
- engaging more broadly with sector stakeholders, practitioners within providers and experts in harassment and sexual misconduct
- meeting with an informal expert advisory group, convened to advise us on findings from the research, conclusions and any areas of recommendation.

Emerging themes from research with students

SUMS' research so far – with students and their representatives through qualitative focus groups and interviews – has surfaced some of the following themes. These are emerging findings and illustrative of some of the topics which have come up so far in discussions with students.

Students' awareness of the statement of expectations

Awareness about the statement of expectations among students and student representatives is very mixed, and many (probably most) only became aware of it through participating in this research. Some student representatives indicated that they would have felt 'more empowered' to challenge their providers to enhance their approaches if they had known about it.

Others expressed scepticism about the likely effect of the statement of expectations given it is 'just a statement' and providers' adherence to it is not being monitored.

Variation among providers' approaches

Our research to date indicates variations among providers in terms of the effect of the statement of expectations on their approaches. This reflects existing differences in how developed their systems, policies and processes were for preventing and responding to harassment and sexual misconduct prior to the launch of the statement of expectations. However, there is a sense among most student and student representative consultees so far that their providers have or are now in the process of developing policies, systems and processes to enable reporting of harassment and sexual misconduct (mainly this is relation to sexual misconduct though as opposed to other forms of harassment more broadly).

A key theme we are exploring in more detail through the qualitative research is challenges for smaller (including independent) providers in their ability to put in place appropriate procedures and support, given their limited size and resources. Students at smaller providers also highlighted the small communities where 'everyone knows one another', both staff and students, making reporting and disclosing challenging. There are some examples of providers beginning to take a collaborative approach to supporting each other's reporting and response processes for these reasons.

Generally, the students we have so far consulted perceive that providers are taking these issues seriously and are likely to respond to student-to-student harassment and sexual misconduct reports. The effectiveness of providers' approaches and any changes in behaviour as a direct or indirect result of the statement of expectations are separate questions, the answers to which are not yet clear.

Encouraging reporting

Many of the students we consulted perceive that there are abiding and overriding concerns among providers about the need to avoid potential external negative attention which may arise if they talk about these issues publicly. Even where there are appropriate policies, systems and processes in place, students believe that this is not being matched by a willingness on the part of providers to proactively encourage students to report incidents of harassment and sexual misconduct.

Generally, students consider that more transparency is needed, with public statements acknowledging that issues of harassment and sexual misconduct exist on campuses, that this is not tolerated and that an increase in reports is desirable and a positive indication of change.

Some students highlighted that information about reporting systems is often 'buried' deep within provider websites or intranets. This information needs to be clearer and better signposted. Students also identified the need for more vocal support from provider leadership teams and awareness raising campaigns with messages repeated every academic year to raise awareness among new students to encourage reporting.

Student experiences of reporting and disciplinary processes

Students who do go through reporting and disciplinary procedures can find the experience overly bureaucratic, lengthy and emotionally draining. Students need to feel well supported throughout and processes simplified and demystified for them if reporting is to be encouraged.

Some students prefer not to report incidents, particularly where they are aware of negative experiences of others who have done so. Others want at least the option of considering an alternative resolutions process as a form of redress, focussed on harm caused to them, alongside enhanced practical and emotional support, rather than to go through a complex disciplinary process with a potential punitive outcome.

Students should be provided with clear information about what the reporting and disciplinary process will involve. Collating and sharing anonymised case studies or testimonies of students' reporting experiences may be helpful.

Changing behaviours and culture

Another clear emerging theme is that the students we have so far consulted are concerned with the behaviours, values and culture of their peers and of their institutions. They want their providers to facilitate deeper conversations between students about what behaviours are acceptable and to discuss the grey areas, rather than, for instance, simply asking students to complete a short online course during a packed induction week.

More substantive and at least some targeted compulsory student training may be needed. Some providers may be overly reliant on simply having a harassment and sexual misconduct policy, system and procedures in place without also offering sufficient awareness raising, training and other preventative activities to drive cultural and behaviour change.

Broader harassment context

Finally, a key question for further examination is how far providers are focussing their efforts on the broader context of harassment in all its forms. Many consultees of all types so far, including students and their representatives, tend to assume that the statement of expectations is focussed only on sexual misconduct and do not appreciate that it covers all forms of harassment in relation to the relevant protected characteristics identified in the Equality Act 2010.

Next steps for the evaluation

We are engaging with as many people as possible to inform the evaluation between now and September 2022. Our planned next steps include:

- Facilitating **four online roundtable discussions** for providers in late June 2022 to discuss different aspects of the statement of expectations.
- Inviting a small group of different types of providers to take part in **case study research** with the evaluation team during late June and July 2022 (on an anonymised basis). This will involve:
 - facilitating individual and small group discussions with leaders, staff practitioners, students' unions and collaborative local civic and third sector partners
 - producing a brief report summarising findings for participating providers, to help them review current approaches and identify where further work or support may be beneficial.
- Conducting **sensitive research through interviews with survivors** of harassment and sexual misconduct.
- Ongoing research and analysis, including **interviews and discussions with other key stakeholders**, such as academic experts, campaigners and student and sector representative bodies.

Further information

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