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OPEN GENDER JOURNAL

The Role of "Watershed Cases" in Implementing Policies on Gender-Based Violence and Harassment in English Higher Education Institutions

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Abstract: Tackling gender-based violence and harassment (GBVH) is an increasingly urgent task for higher education institutions (HEIs) globally. This article explores why HEIs take different approaches in the enactment of policies tackling GBVH. Through a comparative case study approach exploring two contrasting English HEIs, it focuses on one specific aspect of policy implementation that has been a particular challenge: formal report handling. One HEI had implemented national legal guidance in this area, while the other had not. In neither case were HEIs' work in this area primarily driven by the national guidance; instead a proactive response in one HEI was shaped by a 'watershed case' of sexual violence. The article problematises analyses that homogenise the HE sector as taking a uniform approach on this issue, revealing a more complicated reality where institutional actors are highly aware of problems with institutional processes, and where cultures around GBVH shape policy implementation.

Keywords: England, Higher Education, Sexual Harassment, University, Violence

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Introduction

Regulation to address gender-based violence and harassment (GBVH) in higher education has been and is currently being implemented in national contexts globally. The US legislated for higher-education institutions' (HEIs) legal responsibilities on sex discrimination early, with the federal guidance Title IX first introduced in 1972 and later updated in 2011 to reaffirm HEIs' obligations to address sexual harassment and violence (Richards/Gillespie/Claxton 2021). More recent regulation in this area has been adopted in some Canadian provinces (Bergeron et al. 2019) and in Australia, where a federal Code of Practice for HEIs is being developed (Australian Government 2024).

The UK did not have any specific statutory requirements for HEIs to address GBVH at the time of the study that this article discusses. However, the UK context is of interest because among European countries, its policy framework for tackling GBVH is more developed than that of other comparable countries. In England, statutory requirements in this area were announced in 2024 to come into force in August 2025 (Office for Students 2024). Prior to this, non-statutory policy guidance had been in place since 2016, following student activism on this issue (National Union of Students 2010). However, HEIs' implementation of this was patchy, with some institutions adopting significant changes and others doing only very little (SUMS Consulting 2022; Universities UK 2019). These differences in policy implementation raise questions in regard to why some HEIs are more proactive in this area than others. Exploring the perspectives of staff who are involved in enacting work on GBVH in higher education can shed light on why and how some HEIs adopt non-statutory polices while others do not. Therefore, while the present article focuses on England only, it illuminates how this work might be taken up in other international contexts, particularly with a weak statutory regime.

This article focuses on one specific aspect of GBVH policy that has been a particular challenge: formal report handling, around which legal guidance was published in the UK in 2016. It draws on case examples of two institutions with

contrasting responses in this area – one that had implemented policy changes to address this guidance and one that had not – to ask what catalysts and obstacles shape GBVH policy implementation in higher education.

Policy Implementation for GBVH in Higher Education

Even in places that have a political mandate and/or legal requirements for HEIs to address GBVH, these are filtered through a complex set of institutional and extra-institutional factors that can facilitate or hinder relevant work (Simonsson et al. 2024). A study of 16 case studies of HEIs across 15 European countries that explored the effects and consequences of the design and implementation of institutional measures and responses to gender-based violence (Ranea-Triviño et al. 2022) found that such work was characterised by an "incident-driven approach" and an absence of strategy (Ranea-Triviño et al. 2022, 84–85) and that most institutions relied on informal procedures alongside or instead of formal procedures (Ranea-Triviño et al. 2022, 5). Facilitating factors for this work were found both externally to the institution – such as COVID-19, the broader gender-related political context, or government mandates or guidelines – as well as internally, such as in the form of political support from senior management, partnerships with specialist organisations, and in relation to individual actors, personal activism, and feminist beliefs and/or gender expertise.

Indeed, in the wider UK context, the simple fact of GBVH has been a highly influential factor in shaping policy implementation. In a survey of 68 HEIs in the UK, the most important factor for an organisation's approach to preventing and responding to harassment and sexual misconduct was "incidents of harassment and sexual misconduct affecting students" (SUMS Consulting 2022, 20). The second and third most important factors were "input from victim-survivors of harassment and sexual misconduct" and only then the actions of the regulator (in this case, the Office for Students' "statement of expectations", which preceded and foreshadowed the regulatory requirements introduced in 2024) (SUMS Consulting 2022, 20). These findings – that actual incidents are the main driver of action – reflect the fact that nearly one in five students experiences sexual violence in any academic year (Steele et al. 2023) and many students are subjected to such violence and harassment from other students at the same HEI (Bull/Turner-McIntyre 2023). It appears, then, that students' need for institutional support to continue their studies while or after experiencing GBVH is pushing HEIs to act.

Nevertheless, differences between HEIs in regard to the work they are doing need to be explained. Institution-specific analyses highlight varying catalysts

for change. At Yale, a Title-IX investigation alongside "several serious incidents of sexual misconduct" led to institution-wide change (Bagley et al. 2012, 8). At Michigan State University, "a large-scale institutional crisis [i.e., the Larry Nassar case] served as a catalyst for institutional reckoning" (Campbell et al. 2022, 3). In addition, student activism has often been a driver (Lewis/Marine 2019; Marine/Lewis 2020; McCall et al. 2024, 1598). National policy and media attention on this issue – such as Australia's 2017 "Change the Course" report – have also been identified as influential (McCall et al. 2024, 1598) as has the presence and commitment of academic and external experts on gender-based violence (Towl 2016). By contrast, hindrances to this kind of work include lack of awareness of the prevalence of harassment in university life and understanding it as "normal" (Lombardo/Bustelo 2022). In the UK context, Phipps (2018) has claimed that the neoliberalisation of higher education has inhibited HEIs' work in this area, while others argue that despite problems created by marketisation, its impacts on addressing GBVH in higher education have not been straightforward (Bull/Dey 2022).

Existing studies of policy implementation in this area have focused on institutional responses as a whole (Bagley et al. 2012; Beres/Treharne/Stojanov 2019; Campbell et al. 2022; McCall et al. 2024; Simonsson et al. 2024; Towl 2016). This literature – with the exceptions outlined below – has not explored institutional practices for handling formal reports. Indeed, even in an example where a "whole-of-institution" approach is relatively well-developed, "case management and policy" remains "under development" (Beres/Treharne/Stojanov 2019, 656). This lack of progress reveals how challenging this area is for HEIs. In the US, statutory requirements in the form of Title IX have been in place for some time, but "due process" has nevertheless become a political battleground (Brodsky 2021), and the implementation of Title IX has led to policies that are overwhelming and confusing for survivors (Bedera 2022) with poor outcomes that exacerbate gender inequalities (Bedera 2023) and with staff operating in a "fear-based environment" (Cruz 2021, 369). In the UK, with Erin Shannon, I have outlined how "gender regimes" of HEIs affect formal reporting in ways that contribute to the failure of sexual-harassment complaints to be upheld (Bull/Shannon 2024). Indeed, Sara Ahmed (2021) argues that the institutional climate that enables harassment and/or discrimination also shapes institutional responses. There is also a danger of "criminal-justice drift", as a result of which formal HEI processes end up mirroring criminal-justice responses (Cowan/Munro 2021), giving more rights to responding than to reporting parties (Bull/Calvert-Lee/Page 2021; Cowan et al. 2024). This contributes to poor outcomes for reporting parties (Bull/Page 2022), who experience "institutional listening while silencing" (Oman/Bull 2022) while institutional processes fail to address the main reason why they report – to protect others (Bull 2022).

Existing studies of staff perspectives on GBVH-policy implementation in higher education are US-based, analysing statutory rather than non-statutory policy implementation within a very different socio-political and higher-education context (Bedera 2024; Bedera 2023; Bedera 2022; Cruz 2021). Other studies – both within and outside the US – draw on accounts of institutional change led by the respective authors themselves and, as a result, may be limited by having to name the HEI(s) discussed (Bagley et al. 2012; Beres/Treharne/Stojanov 2019; Campbell et al. 2022; Lombardo/Bustelo 2022; McCall et al. 2024; Towl 2016). In studies that do anonymise HEIs, institutional case studies are amalgamated to ensure anonymity, which means that differences between specific HEIs cannot be explored (Simonsson et al. 2024). Furthermore, this literature focuses primarily on what changes or practices were implemented rather than exploring the motivations and drivers behind these changes. By contrast, the present article explores different approaches to the implementation of one specific policy in two English HEIs.

Policy Context and Framework

This article focuses on the implementation of non-statutory policy guidance within two English HEIs prior to the introduction of statutory regulation in 2024. In 2016, following years of activism by the National Union of Students as well as the violence-against-women sector (End Violence Against Women Coalition 2015; National Union of Students 2010), the lobby group for the higher-education sector Universities UK published non-statutory guidance for HEIs for addressing student-student sexual violence, harassment, and hate crime (Universities UK 2016), accompanied by legal guidance that they had commissioned from law firm Pinsent Masons (Pinsent Masons/Universities UK 2016).

Prior to 2016, the so-called Zellick guidance had been in place, which outlined that student disciplinary issues where the alleged misconduct may also constitute a criminal offence should be referred to the police rather than investigated by the university under its disciplinary codes. This was overturned by the 2016 guidance, which states that HEIs themselves should take action on breaches of their policies – such as sexual violence that contravenes staff or student codes of conduct – whether or not the reporting parties choose also to go to the police (Pinsent Masons/Universities UK 2016).

In practice, in instances where students or staff did not report to the police or where the police had taken no action on reports, this guidance provides a legal basis for HEIs to carry out risk assessments, implement safety (or "precautionary") measures, and investigate breaches of their institutional policies that

might also constitute criminal offences. The accompanying report "Changing the Culture" (Universities UK 2016) outlined a "whole-institution" approach for tackling this issue, including a chapter on disciplinary processes that addressed the implementation of Pinsent Masons' guidance. As such, this policy change required a significant amount of capacity building from HEIs in terms of systems, expertise, and resourcing. However, in a 2022 survey of 68 HEIs in the UK, only 63% of institutions stated that they had fully implemented the guidance, while 20% had not started with any such implementation (SUMS Consulting 2022, 48; Jordan et al. 2023, 68). This is one motivation behind this article's exploration of obstacles and catalysts to this implementation.

In the analysis below, I adapt Isabelle Engeli and Amy Mazur's (2018) approach of "Gender-Equality Policy in Practice" for my framing of the discussion. This approach outlines three stages of analysis of policy implementation: first, analysis of the types of "implementation instruments" used in this process; second, the process through which implementation takes place; and finally, the extent to which policies lead to "gender transformation", i.e. 'the extent to which gender policies have succeeded in eliminating gender and sexual hierarchies to create a more gender-just society' (Engeli/Mazur 2018, 120).

The first stage in the implementation of the Pinsent Masons guidance in UK higher education involved two types of "implementation instruments". First, "incentive instruments", which "provide encouragements for target groups to adopt or change a particular behaviour" (Engeli/Mazur 2018, 115). These included the legal guidance itself as well as grant-making by the Higher Education Funding Council for England to HEIs for implementing this agenda (AdvanceHE 2020). In addition, "capacity and learning instruments" encouraged policy implementation through "tools that provide[d] resources, knowledge and skills to catalyse and coordinate the actions of individual policy actors" (AdvanceHE 2020). These included a report published by the lobby group for the higher-education sector Universities UK, which outlined how this guidance should be operationalised (Pinsent Masons/Universities UK 2016), as well as annual conferences and further resources.

The second stage of policy implementation, for the purposes of this policy, is situated within HEIs; it is this stage on which I focus in the following. An analysis of this stage includes asking which (networks of) actors are involved, on which resources they draw in order to be part of this process, and, as a result of this, whose claims are heard.

Finally, the third stage assesses to which extent policies lead to "gender transformation". This can only be assessed 5–10 years after a given policy is

put in place (Engeli/Mazur 2018, 120). As this timeframe had not elapsed at the point of data collection, this stage is not included in my analysis.

While Engeli and Mazur's (2018) approach is designed to assess the implementation of government policies, here, I use it to examine a non-statutory policy agenda. Therefore, in order to adapt the framework, I focus on what Engeli and Mazur call "implementation battles" during the second stage (2018, 117), which include obstacles and catalysts to implementing the agenda within HEIs, including building the capacity necessary for it. A further difference from the approach by Engeli and Mazur is that the policy analysed here is not explicitly one about gender equality and, indeed, has been criticised for taking a gender-blind approach to sexual violence and harassment (Jackson/Sundaram 2020). Nevertheless, in the absence of more specific tools for studying policy implementation in the context of GBVH, the chosen approach provides a suitable framework.

Methods

This article draws on data from a larger study that aimed to understand how higher-education institutions in the UK are handling staff and student GBVH complaints as part of a whole-institution approach, drawing on interviews carried out during 2021 with staff and students that had reported or attempted to report GBVH to their respective HEIs as well as staff across three HEIs that were involved in the handling of such reports (Bull/Shannon 2023; Shannon/Bull 2024). Following data collection in the first institution (not included here), it became clear that uneven policy implementation was an important factor in HEIs' responses to reports. Therefore, for the subsequent two institutions, interviewees were asked about the ways in which change had been initiated or managed in their institution; it is this data on which the following analysis draws.

By contrast with the US, where there is often a specific member of staff or a specific office responsible for implementing GBVH policies (such as the Title IX coordinator), in the UK, this work is dispersed across different roles. As a result, interviewees held a wide range of roles across the institutions, including academic staff in management roles, student services (specialist sexual violence support or discipline staff), complaints, and counselling. Advice workers and sabbatical officers from students' unions across both case-example institutions were also interviewed (see table 1). This wide range of interviewees' roles is indicative of differences between HEIs in GBVH policy implementation as well as the often-fragmented nature of this work at HEIs.

Table 1: Roles of Interviewees

	Pseudonym	Role
Institution 1	Jess	Students' Union Sabbatical Officer
	Becky	Student Complaints Officer
	Michelle	Head of School (Academic Manager)
	Natasha	Students' Union Advice Service Manager
	Joanne	Head of Wellbeing (Student Services)
Institution 2	David	Students' Union Advice Service Manager
	Naomi	Sexual Violence Liaison Officer (providing support to students)
	Khadijah	Students' Union Sabbatical Officer
	Lydia	Student Discipline Manager
	Catriona	Student Services Sexual Misconduct Manager

The institutions were chosen based on two factors: access and variation. Rather than attempting to generalise, the present article explores differences and similarities in policy implementation across two contrasting examples (Yin 2013). The point of variation is that one HEI had implemented the Pinsent Masons guidance at the point of data collection, while the other had not. For reasons of anonymity, contextual details of the case-example institutions are kept to a minimum.

Access was negotiated via a gatekeeper at each institution. Gatekeepers were current or previous staff at the institutions with whom the researcher had connected through her networks; this proved invaluable, and access was granted to staff who had been central to this work within each HEI. Due to these practical limitations on access, it was not possible to match people in the same roles across each HEI. There were also key actors within each HEI who were not accessible for interviews, either because they had left the institution or because they did not respond to requests for participation.

Conducting interviews was chosen as the method of study rather than policy analysis. This was because there already existed policy-based analyses (Jordan/Anitha/Chanamuto 2023; SUMS Consulting 2022; Universities UK 2019) and because interviews can shed light on the reasons for differences in policy implementation. The interviews were carried out in autumn 2021 as semi-structured interviews and explored interviewees' perspectives on the challenges of implementing formal reporting processes for GBVH in higher education – that is, the main requirement of the Pinsent Masons (2016) guidance – across staff-student and student-student complaints.

Using a feminist epistemology (Wise/Stanley 1993), the wider project prioritised methods and data that would support social change in order to make HEIs safer and more equal. Such an epistemology assumes that knowledge is "situated, specific and local to the conditions of its production and thus to the social location and being of its producers" (Wise/Stanley 1993, 227). As such, interviewees' accounts are not seen as the "objective truth" about their respective institutions but as a partial and situated perspective. Based on this perspective, the data were analysed with the assumption that interviewees presented views shaped by their particular roles, status, and lengths of tenure within the institutions.

The data analysis involved the creation of narrative summaries of all individual interviews, then grouping these by institution and summarising the catalysts and obstacles in implementing GBVH policy and practice that were identified in each. Next, a thematic analysis was carried out of the awareness of and the reasons for institutional responses as well as the explanations of how change had happened within the HEIs. The analysis provides a composite picture of each HEI's response and shows where interviewees had differing perspectives on a particular issue. By contrast with other studies that have used data from interviews with staff working in this space (Bedera 2022, 2023; Cruz 2021), the present analysis is positioned primarily at the level of the institution rather than the individual member of staff.

My own positionality as a researcher, critic, and activist in this space undoubtedly shaped the interview data as well as the analysis. Most interviewees were already aware of my research and activism in this area as founder and director of the research and campaigning organisation The 1752 Group. This positionality seemed to be an advantage; interviewees sometimes spoke very frankly about the issues in implementing the policy agenda within their institutions as well as about the limitations and gaps in their institutional responses. As such, I managed to bypass accounts of "happy talk" as Ahmed (2012) describes in relation to diversity practitioners, where "to work for institutions, as practitioners do, can require that you develop a habit of talking in mission talk, [...] a way of telling a happy story of the institution that is at once a story of the institution as happy" (Ahmed 2012, 10). While interviewees – perhaps with the exception of students' union officers and staff, who were independent of HEIs – may still have been presenting an overly positive version of their institutions, there was a clear overlap between the challenges named by complainants and by staff handling reports (Bull/Shannon 2023), which suggests that "happy talk" was not a major issue in relation to the validity of the data. In addition, my expert knowledge of policy and practice within this area enabled me to have detailed conversations

with interviewees about the specificities of their institutional approaches and to critically assess their levels of compliance with existing policy guidance.

The ethical review was conducted by the ethics committee at the University of Portsmouth's Faculty of Humanities and Social Sciences (FHSS 2021-57). Anonymising institutions was crucial for data collection, and the process of anonymisation was discussed with interviewees. As a result, names of roles as well as other small details have been amended to ensure anonymity, and specific dates of key changes have been omitted. All interviewees were offered the opportunity to edit or withdraw their transcripts before data analysis, and one interviewee from Institution 2 reviewed a draft of the article.

Findings

The following provides an overview of obstacles and catalysts to policy implementation at each of the case-study institutions, from the perspectives of interviewees and across three areas that affected capacity building: negative/positive feedback loops; informal networks; and strategy, leadership, and resourcing.

Institution 1: Ad-Hoc Structures and Processes as Inhibitors for Capacity Building

At Institution 1, there were substantial obstacles to implementing Universities UK's recommended "whole-institution" approach and later also the Pinsent Masons guidance (which was not yet in effect at the time of interviews).

Negative Feedback Loops as Inhibitors for Capacity Building

At Institution 1, interviewees described the culture around tackling sexual misconduct as "naïve", "old-fashioned", and "a mixed picture". While one interviewee thought that "there [was] a sense of a level of genuine commitment to the values that it espouses in its mission statement", others' perception was that senior staff did not really believe that GBVH was a problem at the university. This culture – together with a lack of systems/processes, data, and expertise on GBVH – created feedback loops that reinforced the status quo.

A feedback loop can be understood as "a dynamic system where the causal relationship operates in both directions", where a concept (in this case data, systems/processes, or expertise) "is both symptom and cause" (David/Phillips 2023, 2076). One area in which negative feedback loops occurred at Institution 1 was in the process of formal report handling. Despite the existence of a committee

to oversee work in this area for some years, interviewees said there was very little structure in place for dealing with student-student GBVH cases. Existing institutional policies – designed for non-academic complaints in general – were described as not functional for tackling this issue. Only a tiny number of GBVH cases had been heard by disciplinary panels in recent years, according to the interviewees. This appeared to be due to the process for investigating student complaints. Such complaints were assigned to academic investigating managers, who would make a first decision whether to go ahead with an investigation at all. This meant that it was extremely uncommon for GBVH cases to be investigated due to the perception by investigating managers – formed before they had carried out a formal investigation – that there would be insufficient evidence for a case. As a result, investigators' lack of expertise about what could constitute evidence in such cases meant that no formal action was taken on reports, and policies and processes that were unfit for purpose remained unchallenged. This contributed to a situation where policy recommendations on implementing "precautionary measures" and risk assessments in cases of disclosure of sexual violence – to support the implementation of Pinsent Masons' 2016 guidance – were not enacted (Universities UK 2019). A lack of functional policies combined with the lack of expertise by those tasked to implement them enabled the status quo to continue.

A second area where feedback loops appeared to compound the lack of institutional capacity was data. According to students' union advice manager Natasha, Institution 1 relied on anecdotal data about students' experiences of GBVH from the students' union advice service. The students' union sabbatical officer, Jess, had partnered with academic staff for a survey of GBVH and shared the collected data with the university, but had been put under pressure not to publish the findings further (similar accounts are discussed in Bull/Duggan/Livesey 2022). Neither of these two sources of data had driven the institution to implement appropriate policies; its culture of naivety and denial overrode any insights from the data. This culture enabled and perpetuated a negative feedback loop around the lack of institutional action in response to GBVH reports.

Challenges with Strategy, Leadership, and Resourcing

Interviewees from different sections of the institution had varying perspectives on why policy implementation had not taken place, but a common theme was the lack of strategic leadership in this area. For example, changes to the student disciplinary process had been agreed at committee level but then failed to be implemented. Interviewees' perspective was that this was due to a lack of cla-

rity over who was responsible and would manage the necessary resources for pushing forward this work; no-one in senior management or in a position with the power to implement change would action what had been agreed. One interviewee noted that as tackling sexual misconduct was not part of the university strategy, it simply was not seen as important. This failure to action agreed-upon changes was also attributed to the decentralised university structure, which was seen as an impediment to "whole-institution" work. As student services manager Joanne described,

> "it's a sort of chicken-and-egg situation where the centralised approach doesn't exist and the guidance is to create a centralised approach, but then you don't have a centralised team or a centralised place to attach budget requests and those kinds of things."

On top of this, the COVID-19 pandemic had begun the year before data collection, which was perceived as a reason why work in this area was pushed back further. Nevertheless, students' union advice service manager Natasha, while agreeing that getting the necessary work moving had "taken a while", presented a slightly more positive perspective. She argued that strategic work in other areas, in the form of an institution-wide review of policies, was driving change, as it enabled amendments to student disciplinary policies for handling GBVH cases to be implemented as part of this wider review. This review allowed her and other allies (such as Jess and Joanne) to "get into the right rooms" and share the work that they were doing.

Informal Networks Struggling to Build Capacity

Engeli and Mazur (2018) draw attention to the networks of actors involved in policy implementation. In both case-example institutions, these networks were informal. At Institution 1, institutional inertia had led to individuals within the institution with a personal commitment to fighting GBVH "finding each other" and coming together informally in order to push forward new policies and practice and to gather data. Nevertheless, even with this informal network pushing for change, the Pinsent Masons guidance was not implemented. This appeared to be in part because this informal network involved those in operational, not in strategic roles. Joanne described how, while she was responsible for running a team,

> "it's not officially a strategic role that has any power attached to it to say, 'Right, this is what has to happen' [...] You have to keep trying to influence upwards, other people who also lack the remit to address this issue. And we tried to get people who would take it on at the executive-board

> level, but … they've got their own agendas […] It just feels like no-one's quite just been ready to say, at that senior level, 'I'll put my name to that.'"

Similarly, academic manager Michelle described a "frustrating" reliance on "human determination rather than some kind of systemic progressive plan".

Occasionally, committed individuals could make change happen. Becky, working in student complaints services, described how her identity as a working-class LGBT person informed her commitment to this work (which is in line with findings from other studies about the role of committed individuals; see for example Simonsson et al. 2024). While Becky thought that senior management were open to this work, it was due to her individual effort that a process was developed for staff-student complaints:

> "I had kind of pushed and said I would like to write down and agree between us, these are the examples that we will refer to as precedents for when cases get handed over [from student complaints to HR], this is the reporting line, this is what we're going to do with that information. And I had to generate a little bit of a fuss because it's six or seven different senior managers that need to be involved and agree to something.
>
> [The purpose was] just having a formalised approach to dealing with those more serious cases so that every time one comes up – and I cannot tell you how frustrating it is that something awful happens, and everyone's like, 'Well, what are we going to do? Oh, I suppose we'll have to have a meeting.' and I'd be like, 'Well, I don't want to have a meeting, actually, what I want is to follow the process.'"

Becky's successful implementation of this new process was unusual in this institution. Her description of introducing this process reveals Institution 1's usual approach of relying on ad-hoc processes that were reinvented for every new case and depended on whoever was in the room at the time. Informal networks, consisting of staff in operational rather than strategic roles, attempted to overcome negative feedback loops that perpetuated the status quo: a culture of naivety around GBVH with an absence of strategic leadership.

Institution 2: The Role of a "Watershed Case" in Capacity Building

By contrast with Institution 1, Institution 2 had carried out a significant amount of work for addressing GBVH at the time of the study and had implemented the 2016 guidance at a relatively early stage.

Informal Networks for Building Capacity

At Institution 2, one interviewee described a "watershed case" that had catalysed policy implementation. This "watershed case" was a case of student-student sexual violence that had been reported to the police. While waiting for the police case to progress, the reporting party took her own life; her fear of returning to campus was apparently a central catalyst in this decision. As student discipline manager Lydia described, this was

> "a real wake-up moment for the institution, for all those involved, and I think that went right across from student services to the conduct team, to members of academic and professional service staff in the department, all the way to colleagues in a number of other areas, legal and compliance, etc."

The university was put under scrutiny and was not found to be at fault. However, as Lydia described, there was "a sense that we maybe should have had a clearer process", as this case had been dealt with through "a spontaneous coming-together of colleagues to say, 'Well, what is the best thing to do in this situation?'".

> "I was aware that my colleagues were very stressed, very anxious about whether they had done the right thing, whether they should have done something differently. And there was an absence of a process where we could say, 'Well, no, we followed exactly our process'. And there wasn't anything more that I think these colleagues at the time felt that they could do. So, the head of student services at the time and myself sat down and said, 'I think we need to be able to better respond to these disclosures.'"

A lot of work was then put into student support structures. A particular challenge was discipline regulation which, as students' union advice manager David outlined, was "fit for the purpose of dealing with students who set off fire alarms, who are drunk and disorderly, [but] wasn't fit for the purpose of dealing with cases such as this". As a result of this case, processes were put in place for the university to assess risks and put in place safety measures upon receiving a report, and discipline processes were also implemented.

Positive Feedback Loops as Support for Institutional Learning

By contrast with Institution 1, feedback loops at Institution 2 supported positive change. Over time, as a result of handling more cases, the committee that had been put in place to assess risks learned from their ongoing work. For example, the "watershed case" appeared to shape Institution 2's approach to handling

data-protection issues in sexual-misconduct cases, which has been contentious within UK HEIs (Cowan et al. 2024), emboldening them to take some legal risks in sharing the private data of the responding party – such as in the form of precautionary measures and some disciplinary sanctions – with the reporting party.

The institutional culture was also described as important. Students' union staff – whose perspective is particularly helpful as they are independent from the university – included advice manager David and sabbatical officer Khadijah, who after her time in the students' union returned to the university in a related role. David argued that since – or even before – the publication of the Pinsent Masons guidance, there had been "a real desire to push forward and improve things" at the institution. Khadijah confirmed that early on in the work at Institution 2, "the culture was really good" and

> "there were a lot of improvements just in a few months of being in the [sabbatical officer] role. And whenever a reporting student had reported an incident and the accused student agreed that the incident had happened, we saw results actually happening for that reporting student. And I think that was something that hadn't happened before really. There were proper processes in place for making sure that there was some support – and I suppose even justice – for that student."

After this strong start, Institution 2 was on a significant learning curve over the period of several years that this work was ongoing. There appeared to be a feedback loop whereby the early work led to more awareness and support for students and more reports, which allowed staff to make further changes in response to issues that arose in case handling.

However, Institution 2 was still having challenges with cases in which a formal report led to a disciplinary investigation. Sexual violence support officer Naomi thought that

> "students are having a better experience [than before these changes were implemented], but [...] we've got to make sure that we are at least on the same level of service with the reporting process [as with support] because otherwise, we're retraumatising students by asking them to go through a process that potentially is never going to have the desired outcome for them."

In this area, several interviewees from Institution 2 argued that national-sector organisations needed to produce better guidance. Student sexual misconduct manager Catriona, who carried out investigations, commented that

> "I feel in some ways like regulating bodies, since 2016 and overturning Zellick, they've lobbed a hand grenade into the sector and have asked us to deal with that. And there is some guidance out there, some of it

> is good, but when you get into this work, you realise that it really [only] scratches the surface. When we've gone back to various guidance from different bodies to try and find answers to the questions that we've got, they're rarely covered in that guidance."

As a result, individual practitioners such as Catriona were left bearing the responsibility in this area. This responsibility came with significant risks of burnout as staff were left carrying very high-risk caseloads, sometimes with inadequate supervision or institutional support.

Challenges with Strategy, Leadership, and Resourcing

As Catriona's comments reveal, the positive feedback loops in place at Institution 2 were impeded by the significant challenges posed by disciplinary investigations for GBVH. Lack of recognition of these challenges at a strategy and leadership level threatened the sustainability of this work. Interviewees described how Institution 2 had had a strong start to this work but had gone backwards in recent years due to the departure of key personnel and a de-prioritisation by senior management. More widely, this shift in role for HEIs needed to be appropriately resourced, as David from the students' union argued:

> "The set-up needs to evolve with this whole different ball game of discipline cases that are incredibly involved and often very complex. And I think the university's responded in the sense there's been an awful lot of training but ultimately, I think that the staffing levels just aren't there to mean that these are dealt with in a timely fashion."

The positive feedback loops at Institution 2 were not sufficient to overcome all the difficulties posed by this policy agenda. Institution 2's experience therefore demonstrates the level of challenge involved in implementing formal disciplinary processes for handling GBVH in HEIs.

Concluding Discussion

This article described how non-statutory guidance for UK HEIs published in 2016, which set out their legal duty to take action when receiving reports of sexual misconduct that may also be a criminal offence, had been implemented in Institution 2 but not in Institution 1. It outlined obstacles and catalysts for implementing relevant policy, including challenges with building the capacity to actually deliver it.

Institution 1's approach was characterised by ad-hoc structures and processes, negative feedback loops inhibiting capacity building, and informal net-

works rather than strategic leadership, which led to a lack of resources for this work. As a result, the non-implementation of this policy meant that at the time of the interviews in 2021, there were no systems in place for precautionary measures to support students that reported sexual violence, no risk-assessments or case-management processes, and the disciplinary process for addressing sexual violence and harassment within the institution was not fit for purpose. Subsequently to data collection at Institution 1, the new guidance was eventually adopted. However, its slow uptake – more than five years after its publication – shows that compliance with legal guidance was not a priority.

Institution 2, by contrast, had implemented systems for handling student-student GBVH reports, in line with the 2016 guidance. These changes had not, according to interviewees, been driven by the national legal guidance. Instead, a "watershed case", in which a reporting party had taken her own life, had led to "a real wake-up moment" for staff across the institution, similarly to accounts from Beatriz Ranea-Triviño et al. (2022, 88) and Rebecca Campbell et al. (2022). Building on that moment, interviewees described how key staff had driven change, with the support of senior management. The tragic "watershed case" not only led to significant changes across the institution but also shaped the direction of these changes and the priorities in them. For example, Institution 2 was particularly concerned with precautionary measures and assessing risks in student-student cases. Therefore, the institutional response was shaped not only by the fact of the "watershed case" but also by the particular challenges this case had raised. In this way, positive feedback loops had compounded the changes introduced; the more reports of GBVH were received, the more the institution learned about handling such cases.

There were similarities between the two institutions. Both struggled with building capacity and with sustained support from senior leadership for this work. Another similarity was the mobilisation of informal networks to address GBVH. At Institution 1, these informal networks were for the most part unable to get traction to embed policy and practice changes. By contrast, at Institution 2, the informal networks did implement systems and process changes. This could be a result of the "watershed case" at Institution 2. Nevertheless, given the prevalence of GBVH in higher education, it is almost inevitable that Institution 1 would have also had very serious, high-risk cases, and it is possible that a culture of naivety around GBVH impeded such cases leading to change.

Feedback loops worked in opposite ways at each institution. At Institution 2, implementing systems for handling formal reports led to more cases being reported, which led to further institutional learning and progress. At Institution 1, the institutional culture as well as a lack of systems/processes, data, and ex-

pertise on GBVH meant that negative feedback loops reinforced the status quo; scarcely any reports were received, so the institution did not build capacity, expertise, or systems to handle them.

While the case-example institutions were not described in detail in order to enable anonymity, institutional context is important, as UK higher education is highly stratified, with levels of resources and prestige differing greatly between institutions (Boliver 2015). However, perhaps surprisingly, both of the case-example institutions discussed in this article had similar rankings in national league tables, and were not among the most elite, resource-rich institutions. This suggests that institutional prestige and status may not be decisive factors in shaping how HEIs navigate this issue, as even between two institutions of similar status, responses were very different.

Rather, this analysis has highlighted the importance of a "watershed case" as a decisive factor in driving change within an HEI. This case as discussed is highly unlikely to be an isolated incident but rather provides evidence of the high level of risk that HEIs and other education institutions carry in relation to addressing this issue. Given the prevalence of GBVH in higher education (Reynolds et al. 2023; Steele et al. 2023), it should be assumed that all HEIs have had such extremely serious cases. It appears that it is the readiness of an institution to take them up and learn from them – and/or student/staff activism in pushing for change – that turns such cases into "watershed cases".

Of course, it should not require the death of a student or staff member, or another serious failure, to incentivise HEIs to implement policies and practices to address GBVH. The question therefore arises: How does change occur without a "watershed case"? And how can "gender transformation" occur (using Engeli and Mazur's framing) through the implementation of GBVH policies? The findings in this article suggests that legal frameworks – whether statutory or non-statutory – may be less effective in making change than might be assumed by policy makers. In the case of Institution 1, for example, it seems unlikely that the forthcoming introduction of regulation (Office for Students 2024) will immediately shift the institutional culture in ways that guarantee institution-wide commitment, resources, and support for staff responsible for such policies. As a result, such compliance-oriented changes may be ineffective; indeed, as Ahmed (2012) found in her work on equality and diversity policies in the UK, policies were designed to perform legal compliance but often did not influence practice. Similarly, in a study across three Nordic countries – Iceland, Sweden, and Finland – Angelica Simonsson and colleagues found that despite the legal responsibility "to care" about gender-based violence, "this ambition was not matched

by working conditions that would enable the appropriate care-giving work to be carried out in a sustainable way" (Simonsson et al. 2024, 15).

Furthermore, the new higher-education regulatory framework in England for addressing "harassment and sexual misconduct" is a light-touch one that will not involve systematic scrutiny of HEIs' processes in this area (Bull 2024b; Office for Students 2024). Such a regime will not address the current lack of accountability measures for survivors or others let down by their institution (Bull/Page 2022). As a result, even with regulation, policy implementation in this area in the UK is likely to vary greatly across HEIs.

Instead, to achieve gender transformation, regulatory approaches should take into account the priorities of GBVH survivors: transparency and openness, alongside education and prevention (Bull 2024a), protecting others from suffering the same harm (Bull 2022), accountability within a "moral community" (Herman 2023), and multiple routes towards healing and justice (McGlynn/Westmarland 2019). While there are challenges in translating these priorities into institutional processes that ensure fairness to all parties, a progressive regulatory approach could create transparency by requiring data collection and publication from HEIs on this issue as well as by implementing structures that allow for independent scrutiny and better accountability of HEIs.

The analysis presented here has some limitations. First, as it seeks to provide a relatively detailed discussion of change processes, it only includes two HEIs. Second, the interview data reveal a snapshot of one moment and do not allow tracking change over time. Also, not all key actors at each institution could be interviewed. Despite these limitations, the article has gone beyond what policy analysis reveals, as it has outlined interviewees' perspectives on implementing – or failing to implement – policies on GBVH.

In conclusion, this article has problematised analyses that homogenise the higher-education sector as uniformly blocking complaints or failing to address this issue. Rather, it reveals a more complicated reality where institutional actors are, for the most part, highly aware of the problems with their own institutional processes, and where HEIs have differing cultures around GBVH that shape policy implementation. As such, this analysis reveals space for hope that some HEIs are doing important work to address GBVH, even while progress is temporary and fragile.

Data Availability Statement

For research ethics reasons, the research material will not be published.

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