

ANNEX C: GBV policy study results

Findings

ACCESSIBILITY OF GBV POLICIES

We searched almost 1000 university websites and identified few that had openly available policies. While we did not find a large number of GBV policies online comparatively to the number of universities searched, this does not mean that universities in Africa and the Middle East do not have policies on GBV but, rather, may mean that these are not accessible to the public or available on institutional websites. We observed that within Africa, universities in larger and higher-income countries had more developed, comprehensive and accessible policies, particularly, older, more established universities. In MENA, foreign universities with national campuses were more likely to have accessible GBV policies. The finding that there are gaps in public availability of GBV policies on HEI webpages is in line with the findings of other research conducted on the topic, including in Africa.¹

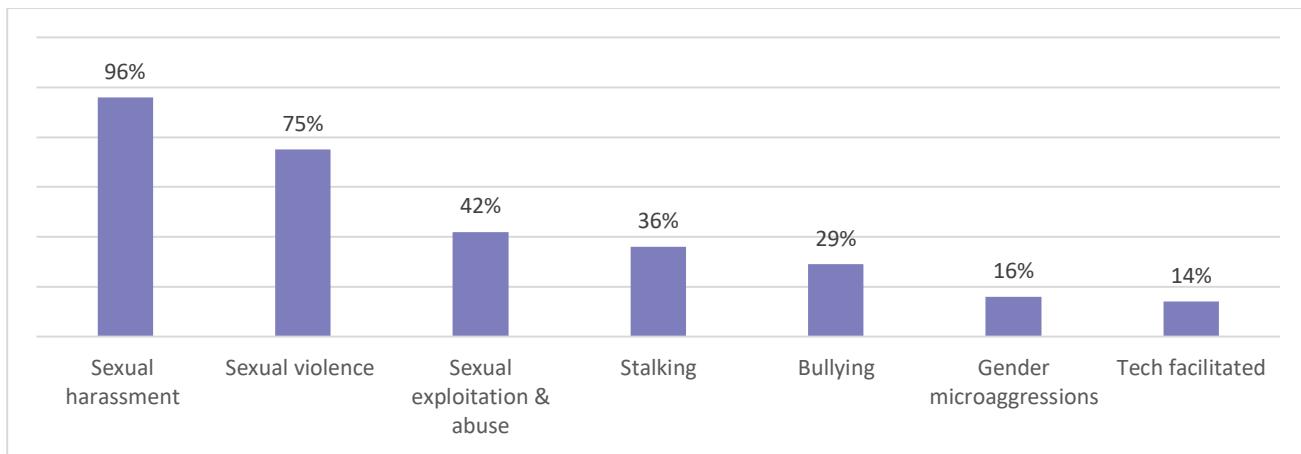
It is important to note that a lack of GBV policies does not necessarily mean that there is a lack of procedure. Not all HEI key informants interviewed for the policy study were from universities with active GBV policies; however, they did have some kind of procedure, protocol or committee to process GBV cases on campus. This means that a lack of GBV policies, or the lack of strong content on GBV in policies, does not necessarily mean that the corresponding issues are not being addressed through other types of systems or protocols. However, several key informants interviewed for the study noted that the lack of an institutional policy had led to challenges with accountability, particularly given the lack of clear alignment between university systems and national legal policy frameworks, to which institutional GBV policies are frequently linked.

TYPES OF GBV ADDRESSED

The results of the policy review found that sexual harassment is the type of GBV that is most addressed in GBV policies in HEIs in Africa and the Middle East (see Figure 1). Almost all policies reviewed either focus explicitly on sexual harassment or include it as part of attention to wider forms of GBV on campus. Three quarters of policies make explicit reference to sexual violence and four in ten refer to various forms of sexual exploitation and abuse (SEA), including 'sex for grades' or other forms of sexual abuse of power. Several policies also refer to stalking, bullying, gender microaggressions or technology-facilitated GBV. Only one or two policies reviewed referred explicitly to other types of GBV, including blackmail, economic violence, grooming or sextortion.

¹ Abdul-Aziz Seidu, B.A. et al. (2024) University Sexual and Gender-Based Violence Policies in Sub-Saharan Africa: Exploring Best Practices. *Journal of Forensic Nursing*, 20(1): 43-52.

Figure 1: Type of GBV addressed in policies



There are some notable sub-regional variations in the types of GBV addressed in GBV policies. While sexual harassment is the most common type of GBV addressed in policies in the Middle East (85%), this is lower than the 97-100% of policies addressing sexual harassment in other sub-regions. It is interesting to note that policies in HEIs that are religiously inclined, including several HEIs in the MENA region, referred to all forms of GBV but refrained from using the word “sexual”, instead using terms such as “violence”, “harassment” and “exploitation”. Sexual violence was addressed most commonly in policies in Southern Africa (89%), East Africa (71%) and West Africa (63%), and less so in the Middle East (46%). SEA was most commonly addressed in policies in Southern Africa (54%) and West Africa (50%), while bullying was most commonly addressed in the MENA region (62%). Technology-facilitated GBV was also slightly more mentioned in policies in the MENA region (15% of policies in the Middle East and 50% in North Africa²) when compared with policies in HEIs in sub-Saharan Africa (ranging from 11-13% of policies across the three sub-regions included). These sub-regional trends reflect the emphasis on different types of GBV addressed in the literature in different sub-regions, as found in the results of the scoping review.

The qualitative data largely mirrors the policy content. HEI focal points interviewed for the study emphasised policy focus on all forms of sexual violence on campus, including sexual harassment, rape and SEA. Notably, several key informants referred to growing attention to technology-facilitated GBV, in line with national legal frameworks and policies that are being strengthened in this area. Multiple key informants also referred to policy content that highlights behaviours aligned with gendered microaggressions, such as sexist jokes. However, only one key informant spoke at length about gendered microaggressions, noting that more emphasis needed to be placed on this type of GBV given its pervasiveness in HEIs, but simultaneous normalisation due to patriarchal institutional cultures that reproduce toxic masculinity.

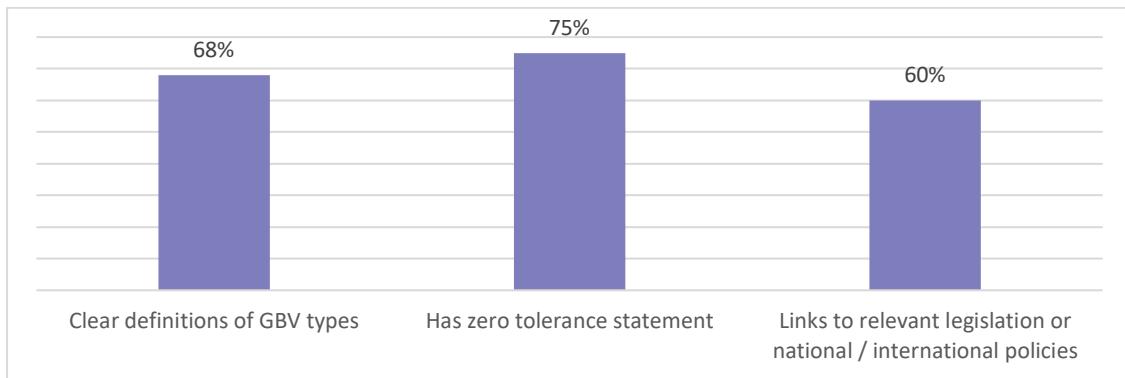
ELEMENTS OF POLICY STATEMENTS

Many of the policies reviewed contain critical elements of policy statements, including clear definitions of GBV types covered under the policy, zero tolerance statements and links to relevant legislation or national or international policies or frameworks (see Figure 2). There was substantial variation in the inclusion of these elements across the sub-regions. The HEIs with the most consistent integration of these elements were found in Southern Africa, where 77% of policies had clear definitions of GBV, 86% had zero tolerance statements and 69% had links to external policies and frameworks. The sub-region with the least consistent integration of these elements was MENA, with 46% of policies having clear definitions of GBV, 62% having zero-tolerance statements and 46% containing links to external policies

² Note however that only four policies from North Africa were reviewed and so 50% constitutes a small number of policies overall (n=2).

and frameworks. It is interesting to note some differences between national HEIs and international HEIs with national campuses. For example, a larger proportion of policies from national HEIs (78%) than international HEIs (58%) contained a zero-tolerance statement. Further, fewer policies from international HEIs (42%) than national HEIs (63%) referred or linked to national or international legislation or frameworks supporting the GBV policy. This appears to be partly due to some international HEI policies used in national campuses having limited adaptations for the local context.

Figure 2: Elements of policy statements



COVERAGE OF STAKEHOLDERS

Almost all the policies reviewed made explicit reference to protections for both students (99%) and staff (95%), with slightly fewer (81%) also including reference to protecting others in the institutional environment (see Figure 3). Most policies also explicitly frame both students and staff as possible perpetrators (81% each), although fewer refer to other types of actors who may perpetrate GBV in higher education settings. There was very little variation between sub-regions in the proportion of policies that protect students, staff and other actors. But there was more variation in coverage of possible perpetrators. While it is clear that most policies regardless of sub-region acknowledge both students and staff as possible perpetrators, the proportion that do so is lowest in East Africa and highest in West Africa (see Figure 4). This is partly related to a small proportion of policies in East Africa making no explicit reference to who possible perpetrators are. It is also notable that a much larger proportion of policies in Southern Africa than in other sub-regions note possible perpetrators who extend beyond student and staff groups, with no policies in West Africa doing so. It is also interesting to note that only 8% of policies from international HEIs with national campuses (compared with 36% of policies from national institutions) gave attention to 'other' non-staff or non-student perpetrators. It is unclear why this is the case, although it may be related to limited adaptations being made to local contexts and thus poor integration of understanding of whom 'other' perpetrators might be in relevant contexts.

Figure 3: Who policies classify as protected and possible perpetrators

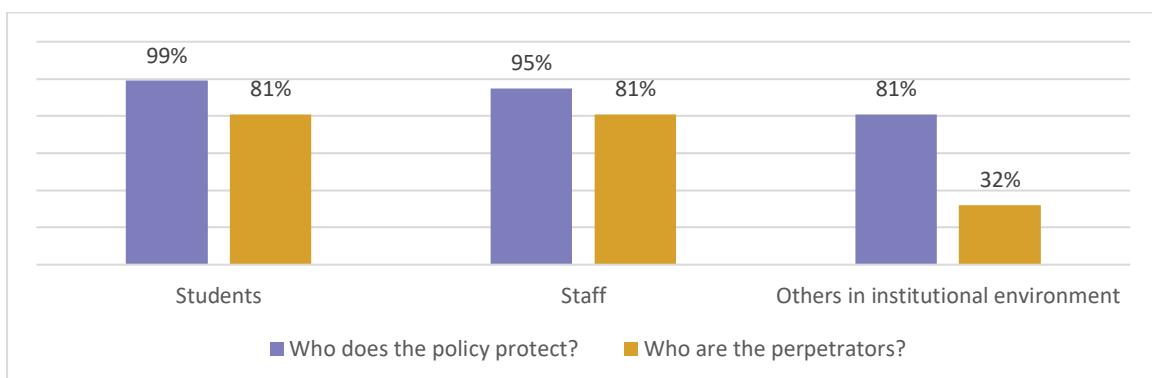
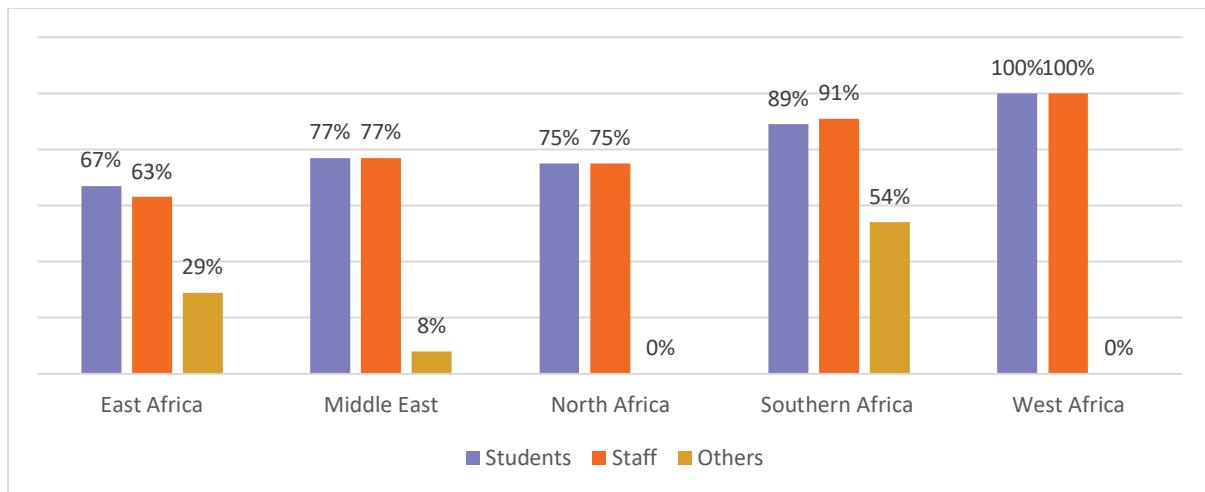


Figure 4: Who policies classify as possible perpetrators, by sub-region



The qualitative interview data mainly reflects the policy analysis presented in Figure 5. Almost all key informants interviewed emphasised that institutional GBV policies protected both students and staff, including administrative, academic and service staff. In some HEIs, key informants noted that policies were different for students and staff, mostly through formal administrative or structural procedures. These include separate policies or codes of conduct for staff and students, or complaints led by different units or departments (see section on institutional structures for handleline complaints). One university focal point noted that their institution only had a formal policy for staff perpetration of GBV against students or other staff and relied on informal processes to communicate about student-student complaints, mainly through information shared during first year induction on procedures for reporting GBV-related complaints against other students. Another university focal point noted that their institution only had a GBV policy for cases between students: *"Yes, between students there are some violence acts and it is included in the Code of Conduct for students and how we deal with this violence. But between faculty and faculty, no, we've never had something like that."*

Fewer key informants referred to policies covering other actors outside of the student and staff population. Two key informants noted that their institution followed a whole community or whole school approach to protection safeguarding and response to GBV, which encompassed other actors beyond students and staff. A few also noted that their institution's GBV policy included explicit reference to external stakeholders, including contractors or visitors. However, several focal points noted that policies were vague or did not address GBV experienced or perpetrated by non-fulltime staff or non-student stakeholders. There appears to be several gaps in relation to coverage of external stakeholders. One is that they are not required to sign commitment to GBV policies in the same way that staff and students are and thus their knowledge of and commitment to policies is unclear. Another gap appears to be lack of clarity on the jurisdiction of the university to handle complaints related to external actors, although one focal point noted that its university's legal department had developed clear statements and guidelines on this.

DIVERSITY AND INTERSECTIONALITY

Overall, attention to diversity and intersectionality was found to be weak in GBV policies in HEIs in Africa and the Middle East, with almost four in ten policies referring to diversity or people with disabilities and even fewer referring to LGBTQI+ people (see Figure 5). Policy recognition of the intersectional characteristics of those vulnerable to GBV in higher education settings varied substantially across sub-regions (see Figure 6). More policies in MENA than in other sub-regions integrated attention to all three policy elements, with the exception of North Africa where 75% of

policies referred to diversity or people with disabilities, although this should be read with caution given only four policies from North Africa were reviewed. Notably, zero policies in North and West Africa mentioned protecting LGBTQI+ people from violence on campus, and fewer policies in East Africa mentioned LGBTQI+ people when compared with other elements related to diversity and intersectionality. It is also notable that a smaller proportion of policies in national HEIs than international HEIs referred to diversity or intersectionality characteristics. For example, 50% of international HEIs policies referred to protections for LGBTQI+ people compared with only 22% of national HEIs. Similarly, 67% of international HEI policies and 35% of national HEI policies referred to people with disabilities.

Figure 5: Proportion of policies containing reference to diversity and intersectionality

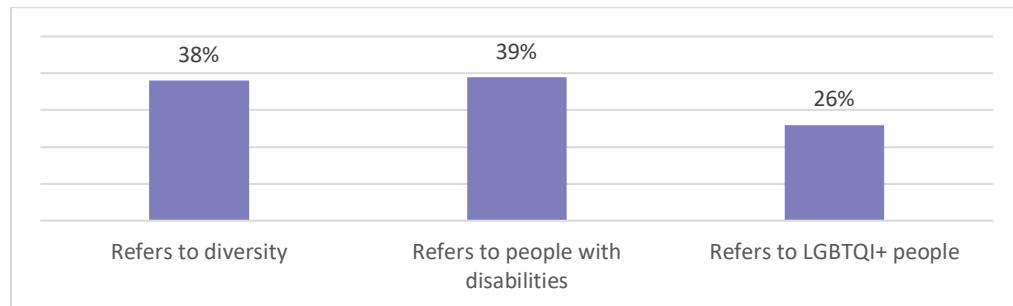
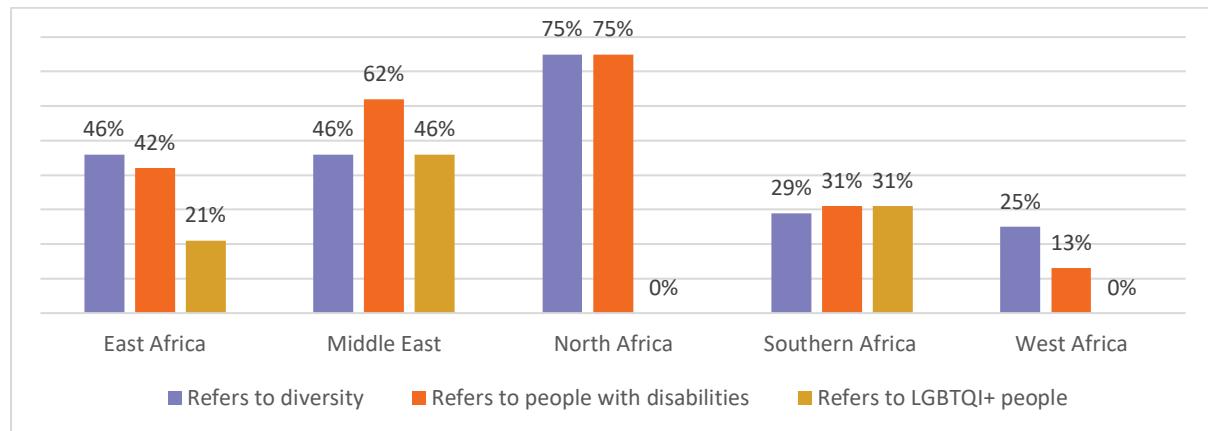


Figure 6: Proportion of policies containing reference to diversity and intersectionality, by sub-region



The qualitative data aligns strongly with the policy desk review data on diversity and intersectionality, with widespread gaps observed in this area. Several key informants suggested that one challenge is that policies are old and have not been updated in line with growing attention globally to intersectionality and inclusion. However, one key informant also noted that growing rollback on rights in the region and increasing anti-gender rhetoric may introduce challenges to updating policies in inclusive ways.

The data indicates a significant gap in attention to policy protections for LGBTQI+ groups. Key informants in both Africa and the Middle East noted the complexities of shaping GBV policies and protections for LGBTQI+ groups given criminalisation of same-sex sexual relationships in their contexts. Some key informants suggested that policies did not make any reference at all to LGBTQI+ people, or sexual or gender identity, and made more generic statements about respecting diversity or eliminating discrimination. Other focal points noted that in contexts of criminalisation of LGBTQI+ people, it was possible to draw from national equality and non-discrimination policies and legal frameworks to emphasise that all stakeholders in the institutional environment were entitled to protections from GBV.

However, they also noted that policy content and language had to be shaped carefully in order to be approved by national legal procedures. As shared by one key informant:

"You can use the process requirements, the investigation and all of those components of it, which are I think very good and best practices in that sense incorporated into your policy without, you know, using the words and things that could be triggering to a court, triggering to a community."

One key informant shared that despite challenges with incorporating explicit attention to LGBTQI+ people, their institution's GBV policy had helped to open up conversations about respect for all populations with stakeholders both within and outside of the university, including in relation to LGBTQI+ students.

Key informants also noted gaps in provision of services and response for people with disabilities. One HEI focal point noted that there were few students with disabilities on campus and while there was sufficient infrastructure for their physical accessibility, there were no specific provisions or accommodations for their engagement with reporting mechanisms in case of experience of GBV. Another HEI focal point stated that:

"The issue of people with disabilities is one of the issues that are generally marginalized in (country), even in terms of arrangements, accommodations and environmental adaptations, except for one issue related to people with disabilities, sometimes there may be discounts on premiums, but otherwise no one ever mentions them in any way."

Despite strong gaps in this area, a few key informants shared that in more recent years, there had been growing attention to inclusive protocols and procedures for reporting and handling GBV against people with disabilities. One key informant also shared that their university had a specialised disability service unit that assisted students with disabilities with any kind of support, including in relation to safe reporting of complaints.

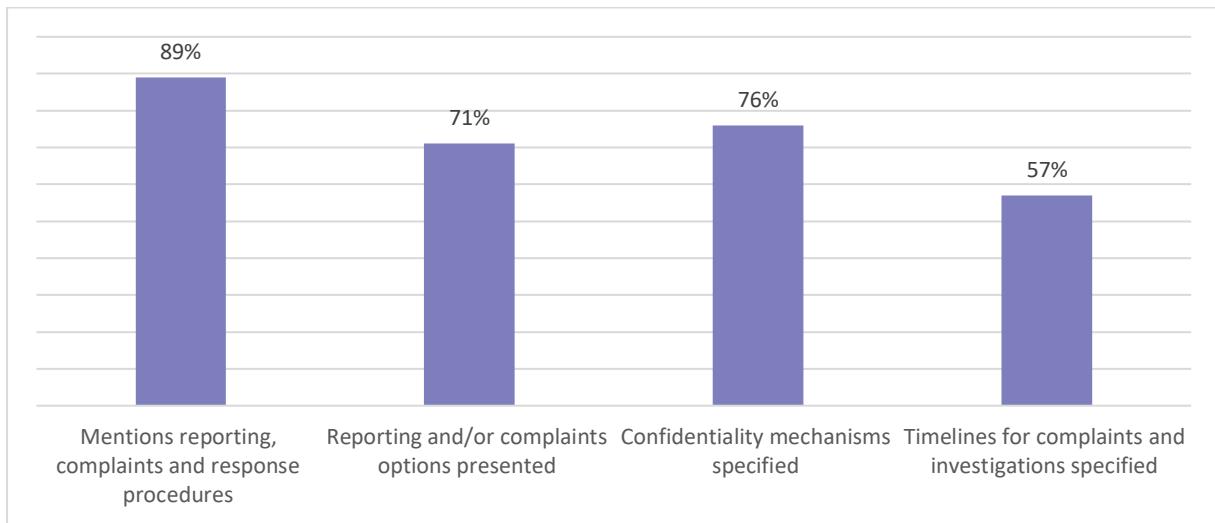
Despite poor or limited attention to LGBTQI+ groups and people with disabilities, some key informants shared other strengths in integrating diversity and inclusion in GBV policy implementation. For example, in universities in some contexts receiving significant migration, including from displaced people, examples emerged of policies and protocols being shared in different languages and modalities to reach students and staff from diverse ethnic and linguistic backgrounds, including staff with limited literacy such as service staff. However, several key informants noted that this was challenging when needing to tailor resources and communication across multiple languages and modalities with limited budgets. One focal point also referred to measures taken to protect refugee students who were at particular risk of bullying and harassment.

REPORTING AND COMPLAINTS MECHANISMS

Almost nine in ten policies reviewed (89%) mention reporting, complaints and response procedures (see Figure 7), with some consistency across most sub-regions but with a slightly smaller proportion of policies doing so in East Africa (79%). Seven in ten policies (71%) included options for reporting complaints, with large variations between sub-regions. For example, 58% of policies in East Africa, 69% in Southern Africa, 85% in the Middle East, 88% in West Africa and all policies in North Africa contained information on options for reporting. Many policies stated multiple different options such as informal, formal and telephone-based reporting. Almost all the policies reviewed mention the importance of confidentiality although slightly fewer (76%) make explicit reference to confidentiality mechanisms in place, offering anonymous reporting of any incident including whistleblowing. Reference to confidentiality mechanisms in place was most common in Southern Africa (91% of policies) and least common in the Middle East (46%). Almost six in ten policies (57%) with very little sub-regional variation

mention a timeline ranging from seven days to three weeks of response once a complaint is filed and encourage 'informal' resolution of the complaint before filing a 'formal' complaint.

Figure 7: Complaints and investigations procedures



The qualitative interviews confirm a wide range of options for reporting a complaint and these vary substantially between universities and depending on whether it is a student or staff member lodging the complaint. Most key informants interviewed referred to multiple different modalities for reporting a complaint, including in written form through a complaints box or by submitting a letter of complaint, or verbally either in person or through the phone/hotline. In person or written complaints are lodged with a number of different actors, depending on the HEI. In many institutions, a student affairs office will be the first point of contact for a student while the human resources (HR) department will be the first point of contact for staff, reflecting the departments or offices that are often the institutional owners of GBV policies in HEIs. Key informants also shared that complaints are often made directly to the faculty that the student or staff member is linked to, a specified focal person with the faculty, a GBV or gender unit if one exists, a health or counselling centre, or in some cases directly to senior leadership, such as a Dean or President of the institution. Several key informants suggested that the person, department or organisation approached may depend on the severity of the case.

Most key informants emphasised the importance of confidentiality of complainants; however, the extent to which procedures are able to fulfil promises of confidentiality varied widely across the interviews. One key informant noted that the names of complainants and even the details of the complaints were removed from any documentation shared with alleged perpetrators, including suspension letters. Another key informant referred to procedures for full confidentiality including committee interviews with complainants in ways that do not disclose their identity (in separate rooms or online without video etc). Despite these measures, some gaps in institutional procedures and challenges in maintaining the confidentiality of complainants were shared. One key informant noted that the alleged perpetrator may be able to guess who the complainant is based on the details of the complaint if these are shared with them. Another key informant suggested that the rights of the alleged perpetrator could not be ignored, including the right to know what kind of complaint is being lodged against them, which may then lead to them guessing who the complainant is. Consequently, protocols may stipulate that both complainants and alleged perpetrators have the right to know the name of the other:

"... within the circumstances of the incident, the complainant and the respondent have to be identified as part of the investigation...I don't think there are safeguards, if he's going to expose her or threaten her outside of the college and within his means, that's it."

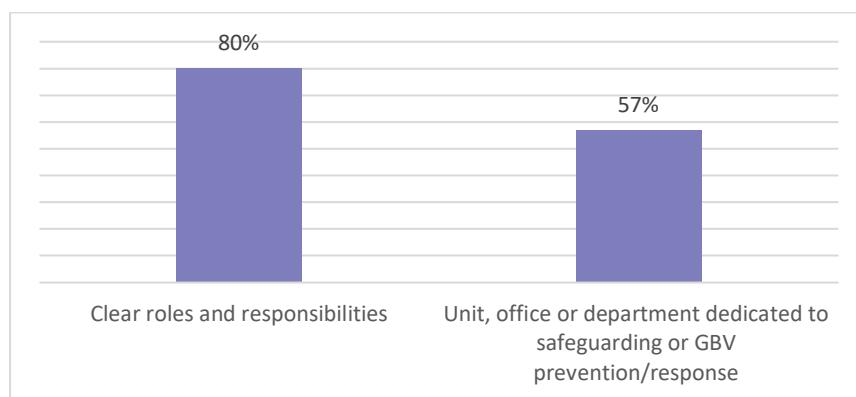
This kind of stipulation was shared in several interviews and one key informant noted that there had been previous challenges with false complaints, leading the university to balance protections for both complainants and alleged perpetrators. Key informants also noted that in some contexts, full transparency of names of complainants is even codified in law. One way that some HEIs deal with the challenges associated with maintaining confidentiality is by offering full confidentiality to complainants reporting a case but noting the limitations that this may pose during an investigation procedure. Complainants are then supported to make a choice in line with survivor-centred approaches.

One key informant from a university that has established procedures for response to complaints noted that the university was facing challenges navigating the issue of confidentiality and was engaging in discussions about how to translate these challenges into the development of a new GBV policy. Another key informant noted that their university had sought guidance on how to establish confidential procedures that would protect the rights of complainants. These findings are aligned with some of the challenges that the research team encountered recruiting key informants for the study, with some contacting the SVRI requesting help and guidance in policy development rather than participation as a key informant with knowledge of policy implementation.

INSTITUTIONAL STRUCTURES FOR HANDLING COMPLAINTS

Eight in ten policies reviewed include clear roles and responsibilities of actors involved in complaints and investigation procedures and protocols, with little sub-regional variation. Approximately half of the policies reviewed (51%) referred to a specific institutional structure for handling complaints, consisting for example of a unit, office, department or other permanent structure (see Figure 8). This was most common in North Africa and West Africa (75% for both) and least common in Southern Africa (40%), with 54% of policies in East Africa and the Middle East stating the presence of some kind of permanent structure to handle complaints. Reference to a permanent structure is also more common in policies in international HEIs (75%) than nation HEIs (47%).

Figure 8: Roles and responsibilities, and institutional structures



Despite only half of policies reviewed referring to permanent structures, several had elaborate reporting and response mechanisms that included dedicated internal complaints committees, ensuring representation from students, no conflict of interest and having a roster to periodically rotate membership. These committees have the mandate to conduct enquiries and have detailed procedures articulated, including response time, steps in enquiry and conditions when external referrals (e.g., to police) will be carried out. Another mechanism for reporting and response observed in the policy

review is where the HEI policies have a designated official who is entrusted to be the reporting official and also convenes an ad-hoc committee, leading the enquiry and dissolving the committee once the matter is resolved.

The KIIs confirmed that various, elaborate institutional structures are in place to handle complaints, with some key informants describing specific units, offices or departments tasked with handling complaints, and others describing permanent, ad hoc or rotating committees responsible for overseeing and in some cases investigating complaints. In some cases complaints are not acted on formally, for instance when a survivor is sharing their experience with a GBV unit, trusted staff member or other focal person, and be requesting psychosocial support but does not wish to lodge a formal complaint. In some cases, this may lead to an informal mediation process facilitated by a trusted staff member or other stakeholder. Two key informants shared examples in which informal mediation processes occurred at the request of the complainant's family to ensure that customary dispute resolution practices were followed, leading to resolutions. However, key informants noted that informal mediation often happened without the intervention of families, particularly when the complainant was female given fears of stigma, retaliation or families removing them from their studies (see section on backlash and retaliation further below).

When a formal complaint is issued, there is a range of possible mechanisms activated depending on the institution. The most common procedure involves the formation of a complaints, grievance or investigations committee, leading to a decision and corresponding disciplinary action (see section on disciplinary action further below). In some HEIs, there are multiple different committees, including complaints committees tasked with raising awareness about GBV in campus; investigations committees tasked with investigating complaints; disciplinary committees tasked with decision making about punishments; and appeals committees in case a complainant or alleged perpetrator wishes to appeal. These committees were largely described as ad hoc ones, set up for specific cases, although some static committees do exist.

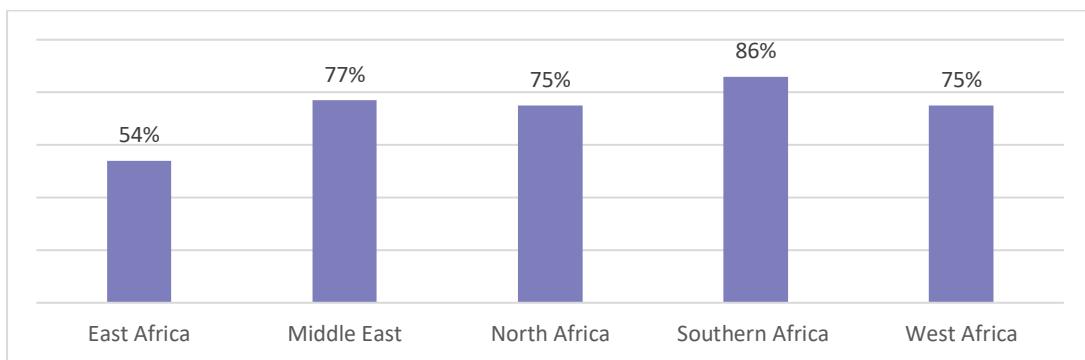
The membership of committees, particularly investigations and disciplinary committees, varies across institutions but often consists of a legal representative (e.g., from law department), a counsellor or welfare focal point (e.g., a student affairs officer), a student representative (e.g. from the student council) and others as appropriate. The study results found that these committees are not always set up with specialist staff according to the case, meaning that they do not necessarily have membership from GBV focal points within the institution. This was observed mainly when procedures for complaints were in place but no specific GBV policy existed. Despite this gap, almost all key informants shared that there was gender balance in committees and that this was usually taken seriously, particularly when the complainant was female.

Notably, the complaints or investigations committee is not necessarily the body that makes decisions about disciplinary action. When describing complaints and investigations procedures, some key informants described the committees themselves as issuing punishments in line with institutional policies and protocols, often with the support of legal representation within the committee. In contrast, some key informants described the decision-making process being transferred to senior leadership in the university, such as a dean or the president, on completion of the investigation, with no further inputs from committees. This appears to be a key fault line in accountability mechanisms given that senior leadership may not always act in a neutral manner and may make decisions in the interest of reputational risk to the university or other factors (see for example the following section on disciplinary actions). In some cases, these accountability gaps are addressed through the opportunity for appeals from either party, which are handled by a committee of neutral actors, regardless of who the decision maker was in the primary case.

DISCIPLINARY ACTION

Almost three quarters of the policies reviewed (74%) specified the relevant disciplinary actions that HEIs would take in response to GBV cases with investigations ruling with the complainant. Specification of disciplinary action was most common in policies in Southern Africa and least common in East Africa (see Figure 9). The policies indicate that there are various penalties for offenders ranging from counselling, dismissal from the university and being debarred.

Figure 9: Proportion of policies specifying disciplinary action



The qualitative data mirror these results and key informants shared a number of different types of disciplinary action taken for students and staff if found guilty of any kind of GBV, including based on the severity of the case. In the case of students, action could include counselling, temporary suspension from studies (e.g., one semester or one year) and expulsion from the university. In the case of staff, action could include counselling, suspension from work for a period of time or dismissal.

Despite most GBV policies containing clear disciplinary actions for GBV on campus, key informants interviewed for the study provided very mixed perspectives about the extent to which these disciplinary actions are taken in accordance with policies and other institutional procedures, usually in relation to accused staff. Several key informants stressed that their institution had very rigorous accountability mechanisms in place to ensure appropriate disciplinary action, and some shared examples of dismissals of staff. However, most examples of staff contracts ended were based on resignations rather than active dismissal. In these examples, staff resignation occurred in three different ways: university leadership asked the staff member to resign prior to a formal investigation; the staff member resigned prior to the completion of the investigation based on their own decision; university leadership asked the staff member to resign after the completion of the formal investigation due to a guilty verdict.

"Recently a student filed a complaint against a professor through the university presidency. There were messages from the harassing professor. The university asked the professor to submit his resignation to avoid being expelled."

"I was aware of more than one case where professors were dismissed. I know of more than one case where they were fired. Sometimes it is part of the punishment and sometimes the president went to that staff and told him to resign. It's better to resign than to be scandalised and punished."

"I know this year, one of our faculty members, was asked to leave after an investigation. Yeah, we didn't get to the end of it because they then resigned. They chose to leave. While we were investigating."

Several key informants also referred to transfers of staff as punishment for GBV. This was mentioned in three different ways. The first form of transfer is horizontal where staff are transferred externally to other campuses or schools in multi-institutional settings, including in other locations. The second form of transfer is vertical where staff are transferred to a lower position in the university hierarchy. The third form of transfer is not institutional but rather individual whereby the staff member, when in an academic advisory role (e.g., of a Masters or PhD student), is transferred off the student's advisory committee and replaced with another advisor.

Transfers or requests for resignation appear to be driven mainly by concerns about reputational risk to the institution if a dismissal due to staff perpetration of GBV becomes known by the public. Some key informants suggested that this was often an acceptable way to handle the balance between punishment of perpetrators and protection of the university. However, several key informants were critical of these practices, noting that universities were not holding perpetrators to account by asking for resignation or transferring them. A key concern is that by not following formally procedures for dismissal, it is not formally recorded that the staff member in question may pose a risk to students or staff in other institutions or even in the same university, albeit with risk higher in the former case. Two key informants noted that their institution would refuse letters of recommendation for staff who had been terminated or forced to resign in order to mitigate concerns about possible future risk.

The extent to which any kind of disciplinary action is taken often depends on two interlinked factors: the severity of the case, and the wishes of the survivor. In terms of severity, key informants noted that dismissal is most common in cases involving sexual violence, including rape, which are classed as criminal acts and handed over to the police and statutory justice institutions. Dismissal or forced resignation are common in cases of sexual harassment involving sexual coercion or exploitation (e.g., 'sex for grades'). Cases involving sexual harassment that is not physical in nature (e.g., inappropriate sexual comments, looks or jokes) or may involve inappropriate sexual touching, appear to be dealt with more frequently through verbal reprisals or warnings.

In terms of survivor wishes, several key informants noted that depending on the severity of the case, survivors sometimes preferred some kind of mediation that would lead to the end of the harassment or violence rather than punitive outcomes for perpetrators. In these cases, mediation and discussion were stated as preferred options, which may include the survivor or their family speaking with the perpetrator with mediation assistance from the university, or the university engaging bilaterally with the perpetrator to reach an agreement on change in conduct. In both cases, agreement by the perpetrator to engage in counselling was stated by several key informants. Requests for non-punitive processes such as mediation appears to be more common in cases involving students, although some examples emerged of mediation in student / staff cases. One key informant also noted the complexities in following survivor-centred approaches that elevated their choices for mediation or other resolutions in contexts where there was pressure from advocates in the university environment for punitive outcomes.

Despite key informants sharing examples of different types of disciplinary action or mediation processes, several also shared examples of complete impunity by staff members, mainly academic staff members. As noted in the previous section, one factor facilitating this impunity is that independent complaints and investigations committees are not necessarily the bodies making decisions about guilt or disciplinary action. Impunity appears to be rooted in two main factors: the power and seniority of the perpetrator, and social norms that reproduce victim blaming narratives and position survivors as responsible for the violence they have experienced. These two factors are summarised clearly in the quote from one interview below.

"R: However, in the end, the case does not get referred to the courts. The complaint remains within the university and is typically resolved informally.

I: And when you say "informally," what does that mean? Does it mean that no disciplinary actions, such as dismissal, are taken against the perpetrator?

R: No, unfortunately not.

I: Have you ever heard of a case where such action was actually taken?

R: Not at all. I have a colleague in another faculty who told me about a staff member—not even a faculty member—who harasses and threatens female students. Yet, unfortunately, he is still there. It's as if he has some kind of untouchable power that keeps him in place, no matter what. No investigation committee or disciplinary action has ever worked against him. He remains untouchable. These matters are resolved through personal connections, unfortunately.

I: And do you think this is the norm in all universities?

R: Yes, I believe so. The only exception would be if, as a first step, the student is confident and capable of standing up for her rights. But that's very rare because they are always under family and societal pressure. The blame is always placed on the student—people assume she must have initiated it."

Impunity of perpetrators is not only driven by their power or seniority within institutions, but also by protection from other powerful actors in the institutional hierarchy. Several key informants emphasised the role of nepotism or 'connections' in protecting senior staff perpetrators, or protections for senior staff due to other factors, including their ability to generate funds for the university. For example, one key informant shared an example of a harassment complaint lodged against an academic staff member who was highly valued for his ability to draw in funding for the university. After several years, the complaint had never reached a conclusion as a complaints and investigations committee was never set up in accordance with the university policy, being blocked by senior leadership.

MANAGING BACKLASH AND RETALIATION

Key informants were asked about whether they had ever observed backlash or retaliation against those who lodged complaints and how policies and procedures managed these risks of harm. A key message to emerge is that fear of backlash and retaliation is a major barrier to survivors reporting cases of GBV, particularly in cases involving academic staff as perpetrators. This emerged mostly in relation to students who were described as fearing negative impact on their academic outcomes, including grades. Several key informants also mentioned the negative social sanctions and backlash against survivors, including stigma, blame and damage to their reputation, sometimes leading to withdrawal of complaints.

"There are those who try to take this step, but days later they withdraw the complaint, we say to them, 'Why did you withdraw the complaint?' We know that either her parents or she was afraid, or the possibility that the other party was able to reach her, so in the end this fear exists. The hesitation is there, it's just that she fears for her reputation, meaning she fears for her livelihood, it doesn't matter the point."

When asked about how HEIs manage risk of backlash and retaliation, only two key informants suggested that there were no procedures in place to protect complainants from potential retaliation. For example, one stated:

"Because you know sometimes if a girl files a complaint against a staff, the balance of power is with him anyway, I mean he can manipulate her marks, many things can happen in universities, I don't know if there are protection systems that have been developed for this kind of complaints."

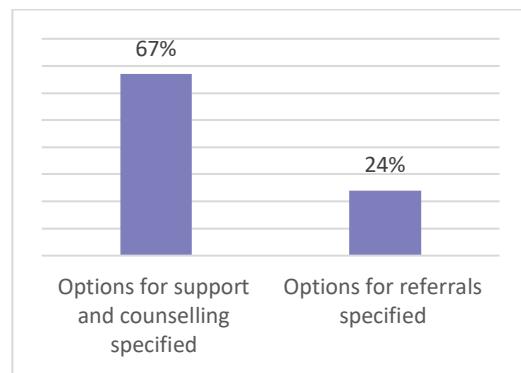
Most key informants noted some kind of formal policy or procedure to protect from retaliation, including embedded in institutional GBV policies or separate whistle blowing policies or codes of conduct. What these policy elements and procedures look like in practice varies across different institutions. Key informants mentioned reactive approaches such as suspending the alleged perpetrator from the university and having additional punishments for retaliation, and preventive approaches such as engaging with security services on campus (e.g., to provide additional protections for complainants) and prohibiting any contact between the complainant and alleged perpetrator. Some challenges emerged in the implementation of these approaches. A key one is the inability of HEIs to manage protections for complainants outside of the institutional environment. Another challenge is in mediating and managing digital communication, whereby it is easier for alleged perpetrators to coerce complainants to withdraw complaints in a digital world where contact through virtual communication is highly accessible.

Most key informants emphasised policy content on confidential treatment of complaints as a mitigation against retaliation, which is in line with the desk review that found that three quarters of policies specified confidentiality mechanisms (Figure 9). However, as noted previously, challenges in ensuring confidentiality means that these mitigations may not be effective.

GBV RESPONSE AND REFERRALS

While two thirds of policies state options for support and counselling for survivors of violence, mainly through internal institutional services, only a quarter specify options for referrals, including to external services such as health or access to justice (see Figure 10). There were few sub-regional variations, with the exception more frequent reference to options for counselling and support in policies in West Africa (88%) than in the other sub-regions. While policies in international HEIs more commonly referred to options for support and counselling (75%) than national HEIs (65%) there was no difference in relation to options for referrals.

Figure 10: GBV response and referrals



The topic of GBV response services for survivors on campus did not emerge frequently in the KIIs. When it did, this was mainly from key informants in HEIs with specific units or departments dedicated to GBV and policy implementation, some of which have dedicated psychosocial support and counselling services, although these services can also be delivered through institutional health services. Some key informants did, however, share procedures for how to make referrals to external services, although this was more commonly described for criminal cases involving rape where protocols and regulations for medical and justice referrals, including to the police, are more clearly stated in policy and other administrative documents.

GBV TRAINING, AWARENESS RAISING AND PREVENTION

Half of the GBV policies reviewed (50%) emphasise the need for training of students and staff on the policies, although fewer policies do so in the Middle East (31%) and North Africa (0%) when compared with other sub-regions (46% in East Africa, 60% in Southern Africa and 75% in West Africa). A slightly larger proportion of policies in national institutions (51%) than international institutions (42%) refer to GBV policy training. Training emerged frequently in the KIIs, with multiple key informants referring to training for both students and staff. For example, a number of key informants shared examples of implementing GBV policy training for students as part of their induction, including with information about GBV and the procedures for making GBV-related complaints. Several key informants also described training for staff, also to raise awareness about GBV and university policies to address it, although with resistance in some cases and one key informant noting that academic staff in particular

rarely showed up for GBV policy training. It is notable that most of these trainings are optional, with only one key informant sharing that there was mandatory training on GBV for all students and staff.

Another theme to emerge frequently in the KIIs was activities to raise awareness about GBV, including through university campaigns. These campaigns are frequently linked to emblematic days or events, including International Women's Day or 16 days of Activism. Key informants also mentioned research, workshops and conferences being implemented to raise awareness about GBV and its prevention and response in HEIs. It is important to mention that most key informants interviewed for the study mentioned commitment to GBV prevention activities, mainly through awareness raising, but few mentioned the implementation of primary prevention activities targeted towards shifting social norms that drive GBV in HEIs or facilitating behavioural change. References to GBV training were usually described through the lens of GBV response and awareness raising about reporting procedures and thus targeted towards potential survivors, with one key informant also describing training for students on how to avoid violence and protect oneself from it on campus. Only two key informant described primary prevention activities being implemented, one through targeted education on harmful gender norms that reproduce GBV in higher education settings delivered to both female and male students, and another focused on bystander training.

MONITORING POLICY IMPLEMENTATION

The desk review results observed that there are very few HEIs that mention plans to monitor the implementation of GBV policies. Only 31% of policies mentioned institutional risk assessment and management to support policy implementation, and this was most common in Southern Africa (43%) and least common in East Africa (17%). There was no difference between national and international institutions. Almost one in three policies (29%) specified feedback mechanisms to ensure that policy monitoring data would be fed back into decision making, most common in Southern Africa (40%) and least common in West Africa (13%) and East Africa (21%). Feedback mechanism were slightly more common in international institutions' policies (33%) than national institutions' policies (28%).

Contrary to the findings from the desk review, the KIIs revealed multiple examples of some kind of monitoring framework for policy implementation. Several key informants described detailed and comprehensive frameworks with indicators and targets. Some described mechanisms in place for recording cases of GBV reported to the university, including type of GBV and action taken, often reported to senior management on a regular basis. A few key informants also shared that services for survivors, including through counselling services in health or GBV units, were monitored through survivor feedback forms. Audits of policy implementation or other structured accountability mechanisms to review progress appear to be less common, although three key informants did mention them. For example, one key informant mentioned the presence of a permanent committee tasked with conducting annual reviews and sharing recommendations on issues related to gender in the university, including GBV, although there is no specific accountability mechanism to ensure these recommendations are taken up.

BARRIERS TO POLICY IMPLEMENTATION

The findings of the study highlight a range of barriers to GBV policy implementation in HEIs in Africa and the Middle East, as outlined below.

Lack of funding

The issue of lack of funding to implement GBV policies emerged in several interviews, including the required funding to establish specific units that could be tasked with responding to and preventing GBV. One key informant from a public university that had just recently launched its first GBV policy noted that scarce government financial resources would likely pose a challenge to policy implementation. Another key informant who was interviewed prior to the USAID freeze mentioned

concerns about the new US administration cutting funding for GBV-related programmes, which she said had happened under Trump's previous administration.

Lack of services for survivors

Almost all key informants noted some level of GBV response available for survivors on campus or accessible outside of the campus. However, one key informant from a university located at the sub-national level noted a complete lack of services outside of the capital, including on the campus, meaning that survivors had to travel long distances to access any kind of support. Even though only one example emerged, this does highlight the challenges that HEIs in sub-national locations may face addressing survivors' needs.

Lack of institutional buy in and support

Several key informants emphasised the importance of having institutional buy in and support when launching and implementing GBV policies, but that this institutional buy in was sometimes lacking and challenging to build. Where stronger buy in was described, this appeared to be related to individual support for the agenda, particularly from women in university leadership. Where buy in was reported to be weak, this appears to be due to different factors, including denial of GBV in HEIs as an issue, active resistance from leadership due to concerns about reputational risk to the institution, staff beliefs that the policy does not apply to them or leadership perceptions that policy implementation is somebody else's job.

Lack of reporting

Low levels of reporting of cases remains one of the most significant challenges to GBV policy implementation. When asked about uptake of complaints, a few key informants noted sizable numbers of formal complaints having been lodged, albeit not always proceeding to investigation. However, most respondents suggested that few complaints had been formally lodged comparatively to the number of cases assumed or known to have occurred, including, for example, informal complaints by students wanting psychosocial support and/or mediation but without taking the case any further. As noted previously in the report, there are multiple barriers to reporting, including fear of backlash and reprisal and known power and impunity of perpetrators. The issue of social norms also emerged frequently, including norms around respect for elders and authority, preventing complainants from reporting. As noted previously, fear of stigma and victim blaming is a significant deterrent to reporting GBV cases, with dire consequences for female students in particular, including being removed from their studies by families.

"Female students often approach me because they feel I am somewhat close to them. Some come to complain about a certain professor, alleging incidents that could be classified as harassment or inappropriate invitations to be alone, or even outright sexual harassment. When this happens, I tell them: "Okay, write a formal complaint, and I will forward it and ensure you get your rights." However, they hesitate to submit written complaints because they fear being summoned with their families involved. They feel they are the ones who will lose in the end. They say, "I will be the one prevented from attending university, and my fate will be to stay at home." So, they only share their experiences to inform me about what is happening, without filing official complaints."

Weak or poorly integrated national legal frameworks

The absence of strong national legal frameworks related to GBV prevention and response emerged as a critical barrier to supporting the development and implementation of GBV policies in HEIs. Several key informants noted outdated legal frameworks and penal codes in which certain types of GBV, including sexual harassment, and corresponding punishments were not addressed. As noted by one key informant:

"Yes, there is the penal code. There is, but it's very old, a very old law. And even the penalties and punishments are very light, meaning the material punishments or the penalties for the harasser and the conditions that must be met to prove harassment make the process of proving it almost impossible. Also, the definition of harassment in the law is very different. When they tell you in the penal code, it doesn't pay attention, it doesn't care about the current concept of harassment. For them, it's only sexual assault that is punished."

Another key informant shared that national legal provisions for sexual harassment had been updated several years ago but that this had not necessarily translated into corresponding adjustments in university policies. A key informant from a university with GBV complaints protocols but no specific policy noted that one reason for the lack of an institutional policy on sexual harassment was the lack of national legal frameworks addressing this type of GBV that a higher education institutional policy could use as backing.

Rollback on gender rights

This issue came up in two interviews in which key informants noted how the global rollback on rights has affected women's rights units and departments in HEIs. As stated by one key informant:

"Well, there is a social challenge that we see in public life in (country) towards women's rights organisations, that they themselves are under pressure and stigmatised and even their agendas are questioned and so on. In other words, women's studies departments are subject to the same thing within the university community."

This particular key informant noted an increasing shift away from the concept of gender due to perceptions that women's rights programming, including in HEIs, has suffered by being linked to gender narratives.