SEXUAL HARASSMENT PROTOCOLS IN EUROPEAN HIGHER EDUCATION INSTITUTIONS: ETHICS-DRIVEN RESPONSES TO VICTIMS-SURVIVORS

A policy brief from the Uni4Equity Project

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Note: This Policy Brief draws on the Uni4Equity Project deliverables D4.3 (*Improved protocols*) and D5.1 (*Improved measures for victims' follow-up in sexual harassment protocols*), as well as on the article (under review) *Sexual harassment protocols at European universities: An overview of key components and recommendations for improvement* by Marina Berbegal-Bernabeu, Vanesa Pérez-Martínez, Mafalda Sousa, Sofia Neves, Anneleen De Cuyper, Stefano Porru, Angela Carta, Maryna Manchenko, Sylwia Jaskulska, Barbara Jankowiak, Marlies Wallner, Viktoria Stifter, and Carmen Vives-Cases.

Executive Summary:

Sexual harassment in higher education is a persistent and structural phenomenon. It reflects unequal power relations and organizational cultures that silence or normalize abusive behaviors. In the last decades, several policies, resources and mechanisms have been developed by higher education institutions to prevent and combat sexual harassment, and to respond properly to sexual harassment victims-survivors, who suffer serious impacts in their personal, social and academic lives. Victims-survivors' response must be specialized, coordinated and ethics-driven, ensuring risk assessment, and trauma-informed approaches.

This Policy Brief reflects on sexual harassment institutional protocols improvements, with a focus on ethically grounded responses to victims-survivors. Data from a content analysis of the SH-related protocols of the six targeted European universities in Uni4Equity project (Vives-Cases et al., 2025), revealed progressive advances in their sexual harassment institutional protocols concerning ethics dimensions when responding to victims-survivors. By developing multi-sectoral networks, protecting sensitive information, safeguarding confidentially, integrating an intersectional perspective, expanding access to specialized psychological support, strengthening potential victims-survivors' confidence in reporting mechanisms, and improving coordination mechanisms, higher education institutions show their commitment to reducing barriers to disclosure and to promoting safer and more responsive institutional pathways.

Nevertheless, while several higher education institutions have introduced ethically oriented good practices in responding to sexual harassment, progress remains uneven and the shift to fully operational protocols is still ongoing. In some institutions, protocols are not applied yet because they remain under revision or pending approval, and coordination mechanisms are undefined. Also, differences persist in access to reporting pathways and in confidentiality safeguards across groups, with staff in some cases receiving less protection than students, and not all higher education institutions ensure follow-up and reparation actions for victims-survivors.

Although most higher education institutions have specialized psychological services for victims-survivors, the information about the application of trauma-informed approaches is not obvious in sexual harassment protocols. Additionality, some of the higher education institutions failed an intersectional approach, not considering specifically structural barriers, affecting mostly women, lesbian, gay, bisexual, transgender, queer, intersex, asexual and other gender-diverse individuals, and people with mental disabilities. Although the Project led to the production of

multilingual materials and the development of targeted measures for specific groups, these improvements have not been implemented across all higher education institutions. Translation services are not available for victims-survivors nor for accused perpetrators who don't speak the local language. The lack of English-language SH protocols and codes of conduct may increase international staff and students' vulnerability by making them more likely to tolerate unacceptable behaviour and to breach rules unintentionally due to lack of awareness. Finally, coordination mechanisms in terms of establishment of institutional agreements and availability of information about the support services are not implemented in all the higher education institutions.

These gaps may have profound ethical impacts on victims-survivors, in terms of safety and protection. Inexistent or unequal access to sexual harassment institutional protocols, lack of knowledge on reporting mechanisms, inequalities in the treatment of confidentiality issues, along with the non-inclusion of intersectional issues, may reinforce invisibility and exclusion, and favor further victimization.

Measures aiming ethics reinforcement in sexual harassment institutional protocols must be adopted to enhance integrated responses to victims-survivors in the higher education institutions.

Summary of Key Findings:

- **Sexual harassment institutional protocols**

Although several advances have been made, not all higher education institutions have a specific sexual harassment protocol or code of conduct. In some cases, documents are still under revision or pending approval, delaying full implementation. Confidentiality is addressed across all higher education institutions, but its application is not always consistent between different groups (e.g., students and staff). Accessibility to reporting mechanisms also varies. Continuous monitoring and evaluation of sexual harassment protocols are punctual.

- **Psychological services for victims-survivors**

Psychological services for victims-survivors are provided by all higher education institutions, except one. The reference of trauma-informed approaches is residual. No translation services are offered in case local language is not spoken by victims-survivors.

- **Follow-up and reparation actions for victims-survivors**

Most higher education institutions ensure a specific and individualized follow-up plan for sexual harassment victims-survivors. All provide information and referral to internal or external services, except for one. Some of them offer protective measures for victims-survivors within their higher education institutions, as well as compensatory measures.

- **Intersectional approach**

None of the sexual harassment institutional protocols or codes of conduct and regulations explicitly mention intersectionality. However, some refer to the rights of people with disabilities and reject any type of discrimination. The existence of multilingual materials and targeted measures for specific groups are also punctual.

- **Coordination mechanisms**

Some Higher education institutions have a network of resources, including governmental and non-governmental entities, with whom contacts and referrals could be made in sexual harassment cases.

Summary of Policy Recommendations:

- **Sexual harassment institutional protocols**

Ensure sexual harassment institutional protocols are fully operational and inclusive-accessible, respecting equal confidentially and access to reporting mechanisms by all the members of Higher education institutions communities.

- **Psychological services for victims-survivors**

Guarantee psychological services for victims-survivors, based on trauma-informed approaches, and provided by specialized professionals.

- **Follow-up and reparation actions for victims-survivors**

Make individualized follow-up and reparation actions mandatory in all sexual harassment institutional protocols, respecting victims-survivors' needs.

- **Intersectional approach**

Embed intersectionality explicitly in sexual harassment protocols and measures to be adopted, recognizing potential additional vulnerabilities may negatively impact different types of victims-survivors.

- **Coordination mechanisms**

Formalize and strengthen coordination mechanisms by establishing an institutional referral network in each higher education institution.

1. Introduction:

In higher education, sexual harassment remains an ongoing and structurally embedded problem that violates ethical values, undermines academic integrity, and threatens the well-being of university communities' members (Steele et al., 2021). Higher education institutions where the hierarchical structures are less democratic reveal higher levels of sexual harassment (Bondestam & Lundqvist, 2020) which consists in unwanted sexual behaviours that creates intimidating, hostile, or humiliating environments (Council of Europe, 2011). These behaviours have serious impacts on victims-survivors' lives, causing fear and insecurity, and a sense of mistrust and impunity.

Having higher education institutions sexual harassment protocols is not enough to ensure effective institutional responses. Ethically robust responses depend on how protocols are governed, implemented, and evaluated, which in turn requires strong coordination across institutional structures and services, and clear, timely decision-making (Humbert & Strid, 2025). When responsibilities are fragmented and dispersed, and when protocols, reporting pathways, contact points, and specialized services are not sufficiently visible or well-known across the university communities, reporting is likely to decrease. In these conditions, victims-survivors may perceive the higher education institutions as unresponsive or indifferent, eroding trust and discouraging help-seeking (Roberts et al., 2023).

Ethical shortcomings are intensified when fragmentation produces inconsistent procedures across the higher education institutions structures, weak transmission of sensitive information, inadequate risk assessment and management, and delays in activating immediate protective measures. These failures undermine procedural efficacy and can expose victims-survivors to further harm, including secondary victimization and institutional neglect (Smidt et al, 2023). Collectively, such dynamics conflict with core ethical orientations that should guide institutional action on sexual harassment: respect for victims-survivors' dignity, autonomy, safety, and care. Where victims-survivors' needs and wellbeing are not prioritized, protocols risk becoming symbolic instruments that weaken, rather than strengthen, the ethical legitimacy of higher education institutions' responses (Crusto et al., 2024). Despite normative advances, many victims-survivors still face substantial barriers to reporting sexual harassment and accessing specialized support. These barriers are exacerbated by intersectional inequalities, particularly for people from socially vulnerable groups, including women, lesbian, gay, bisexual, transgender, queer, intersex, asexual and other gender-diverse individuals, and people with mental disabilities (Dawson et al., 2024). In Europe, even with increased legislative scrutiny and

expanded institutional action, sexual harassment prevalence in the higher education institutions remains high. Where institutional policies, resources, and prevention-and-response mechanisms are absent or weak, the likelihood of revictimization increases, and the consequences of victimization worsen. Conversely, when specialized services exist and are accessible, disclosure may be facilitated and the short- and long-term impacts of both in-person and online sexual harassment can be mitigated.

Ethical handling of sexual harassment cases therefore demands more than legal compliance or disciplinary procedures. Protocols should embed victim-centered ethical orientations, such as empathy, confidentiality, options for anonymity, and specialized support, as ethical practice can reduce harm and support empowerment and self-agency. Given sexual harassment is a potentially traumatic experience and a serious form of Human Rights violence with pervasive mental, physical, and social health consequences, higher education institutions should adopt trauma-informed approaches grounded in active listening, independence, and protection of dignity. This requires recognizing victims-survivors protection as not only a legal obligation but also a collective institutional responsibility, supported by coordinated internal and external networks (Javorka & Campbell, 2019).

Finally, an intersectional perspective must be systematically applied, accounting for diversity in gender, migration status, disability, sexual orientation, and other social identities (Wood et al., 2022). Ignoring these specificities risks reproducing inequalities and reinforcing victims-survivors' invisibility. For this reason, preventing and combating sexual harassment in higher education institutions is inseparable from the broader institutional mission to advance social justice and equality.

Data from the Uni4Equity Survey confirms that sexual harassment prevalence remains concerning, with 36% of respondents reporting in-person sexual harassment and 17% reporting online sexual harassment. A qualitative analysis of higher education institutions' sexual harassment institutional protocols characteristics, conducted to identify enhancements associated with the Project's implementation, concluded important achievements. Higher education institutions broadened their approach from immediate case management to long-term victims-survivors' protection and reparation, shifting toward more ethics-driven responses. As discussed in the next section, the Project results suggest the necessity of strengthen governance, coordination, implementation and evaluation of sexual harassment institutional protocols, and incorporate more specialized psychological services and intersectional orientations when responding to victims-survivors.

2. Key Findings:

- ### Sexual harassment institutional protocols

Only four higher education institutions, University of Alicante (UA), University of Maia (UMAIA), Adam Mickiewicz University (AMU) and University of Antwerp (ANTWERP), have a protocol or a code of conduct on how incidents of sexual harassment are reported, addressed and resolved. The University of Verona (UNIVR) have two different regulations that includes sexual harassment, and the University of Applied Sciences Burgenland Campus (UASB) has complementary two documents including sexual harassment. While all higher education institutions address confidentiality in their protocols, the criteria and mechanisms for staff and students are not always applied in the same way. Variations were also noted in access to reporting channels, with some groups having more direct or complete access than others. Only the UA continuously evaluate and monitor its sexual harassment protocol.

- ### Psychological services for victims-survivors

Psychological services for victims-survivors are provided by all higher education institutions, except for UASB. Only the UMAIA referred having professionals specialized in trauma, ensuring tailored clinical and forensic assistance for victims-survivors. No translation services are offered in case local language is not spoken by victims-survivors.

- ### Follow-up and reparation actions for victims-survivors

The UA, AMU, UNIVR and UANTWERP ensure a specific and individualized follow-up plan for each case. Only the UA continuously evaluate and monitor the sexual harassment protocol. All universities provide information and referral to internal or external services (e.g., psychological support, legal guidance), except for UASB. UA and UNIVR also provide protective measures for victims-survivors within their higher education institutions, which is guaranteed by security services. The UA, UMAIA, AMU and UANTWERP offers compensatory measures (e.g., flexibility in class/work attendance, administrative adaptations), whilst symbolic reparation measures (e.g., commemoration days) and other types of support are offered only by the UA.

- ### Intersectional approach:

None of the sexual harassment institutional protocols or codes of conduct and regulations explicitly mention intersectionality. Only the UA, UMAIA and UNIVR makes a brief reference to the rights of people with disabilities and the rejection of any type of discrimination. The UASB

protocol includes a reference to power relations as a risk factor for sexual harassment victimization and perpetration.

- **Coordination mechanisms:**

The UA, UMAIA and UNIVR have a network of resources, including governmental and non-governmental entities, with whom contacts and referrals could be made in sexual harassment cases. The UA, UASB, UNIVR and UANTWERP include in their protocols or websites (e.g., the Equality Unit website) information on available support services.

3. Best Practices & Case Studies:

The comparative analysis of sexual harassment institutional protocols developed within the Uni4Equity Project identified some higher education institutions best practices concerning ethics-driven responses to victims-survivors, based in the UA, UNIVR and UASB case studies. Despite the diversity of institutional contexts, the cases analyzed converge around three fundamental dimensions: the reinforcement of confidentiality and information management, the multisectoral integration of services, and the progressive institutionalization of trauma-informed approaches.

The UA represents a particularly relevant example regarding **internal organizational procedures and protection of sensitive information**. The centralization of sexual harassment cases management by the Equality Unit, combined with the implementation of a digital document submission system, with restricted access, has contributed to reinforcing confidentiality, reducing the risk of improper data exposure, and increasing victims-survivors' trust in institutional mechanisms. Improvements in registration and monitoring systems have also enabled more systematic data collection for internal evaluation and strategic planning purposes. Although a need to formalize agreements with external entities remains, the UA model demonstrates how the **clear structuring of internal workflows** constitutes an essential condition for sexual harassment protocol effectiveness.

The UNIVR developed an advanced **multisectoral intervention system**. This model relies on a formal institutional network that coordinates psychology, psychiatry, occupational health services, confidential advisors, administrative and disciplinary bodies. The existence of formal institutional agreements and clear operational flowcharts allows for a coordinated response from the initial reporting phase through to long-term follow-up. This integration facilitates risk assessment, early intervention in complex situations, and effective coordination between disciplinary procedures and mental health care. Despite the substantial demands on resources

and coordination, integrated models can deliver comprehensive and coherent responses aligned with trauma-informed principles.

The UASB has a model **based on a proximity and mediation institutional network**, albeit with structural vulnerabilities. Designating an Ombudswoman as a trusted contact, linking her role with the Gender & Diversity Unit and the works council, and offering confidential advice before any formal report have created a safe first point of contact. This structure provides protected listening spaces and enables step-by-step, proportionate responses, particularly in lower-severity cases. The model highlights the importance of **informal support mechanisms and relational accessibility,** particularly for victims-survivors hesitant to immediately engage with formal procedures. Although it requires further formalization, the UASB experience demonstrates how establishing trusted points of contact can reduce barriers to reporting and prevent sexual harassment escalation.

In sum:

- Protecting sensitive information through restricted-access case management systems and standardized documentation is essential to safeguard confidentiality and build institutional trust.
- Formal multi-sector coordination, supported by institutional agreements with health providers and external specialist services, strengthens responses in complex or high-risk sexual harassment cases.
- Clear operational workflows that define stages, responsibilities, and response timelines reduce uncertainty and help prevent secondary victimization.
- Visible and accessible focal points, combined with safe initial listening spaces, facilitate early disclosure and timely access to support.
- Training in empathy, trauma-informed approaches, and equality is indispensable to ensure consistent, high-quality interventions.

Together, these best practices show that effective sexual harassment institutional protocols depend not only on formal rules, but on an institution's ability to combine legal rigor, relational sensitivity, and organizational coordination, translating ethical principles into sustainable day-to-day practice.

4. Policy Recommendations:

- **Sexual harassment institutional protocols**

Ensure all higher education institutions have fully operational and inclusive-accessible sexual harassment protocols, available to all members, that includes information on:

- o Sexual harassment characteristics, typologies, dynamics, impacts and consequences.
- o Risk and protective factors to sexual harassment victimization.
- o Data protection policies, legal support and confidentiality. The protection of personal data should be regarded as an ethical and legal obligation inseparable from the institutional response. To prevent ethical and legal harm resulting from the improper disclosure of sensitive information, higher education institutions must:
  - Ensure anonymized databases for sexual harassment records.
  - Establish clear, enforceable policies for the secure storage, retention, access, archiving, and timely deletion of sensitive case data.
  - Conduct regular information security audits.
  - Ensure specific training in data protection for all staff involved.
- o Who or what structures are responsible for sexual harassment protocols governance, implementation, monitoring and evaluation.
- o How higher education institutions handle and manage sexual harassment cases, providing detail concerning step-by-step procedures, measures to be adopted and action flowchart.
- o Internal reporting channels, codes of conduct and contact points.
- o Specialized services inside and outside higher education institutions, free of charge.
- o Victims-survivors' and perpetrators' rights and duties.

Sexual harassment protocols must be linked to risk assessment and management procedures considering:

- o Ethical procedures aiming victims-survivors' protection and safety, respecting confidentiality, informed consent, anonymity and self-agency.
- o Scientific-validated instruments.
- o Criteria for different levels of risk and urgency, and respective decision-making flows.
- o Safety plans, including within the higher education institutions, for different levels of risk and urgency.
- o Referrals to internal and/or external reporting mechanisms and specialized support services, such as psychological services for victims-survivors.

- Coordination with emergency services, law enforcement and police authorities, if necessary.
- Follow-up measures and monitoring.

- **Psychological services for victims-survivors**

All higher education institutions must guarantee psychological services for victims-survivors, that ensure:

- Victims-survivors' expectations and needs.
- Victims-survivors' autonomy, confidentiality and protection.
- Language accessibility, by offering translation/interpretation and multilingual information so that non-native victims-survivors feel respected and comprehended.
- Crises and long-term intervention, based on trauma-informed and victims-centered approaches, and provided by specialized professionals.
- Revictimization and secondary victimization prevention. The prevention of further victimization must be an explicit objective of sexual harassment protocols, as non-maleficence intervention is an ethical obligation to minimize secondary harm. higher education institutions structures and services must avoid unnecessary interactions with victims-survivors and eliminate implicit victim-blaming practices and discourses.
- Articulation with internal services, reducing victims-survivors' public exposure.
- Referral to external specialized services, if needed.

- **Follow-up and reparation actions for victims-survivors**

Individualized follow-up and reparation actions must be mandatory in all higher education institutions sexual harassment institutional protocols, by:

- Managing risk exposure.
- Developing personal follow-up and monitoring plans. If victims-survivors are receiving psychological support, plans must be made in articulation with those services.
- Adapting compensatory measures, such as academic or work adjustments.
- Ensuring victims-survivors-led restorative or symbolic actions where appropriate.

- **Intersectional approach**

An intersectional approach must be explicit in sexual harassment protocols, by:

- Recognizing that sexual harassment affects different groups depending on sexual orientation, gender identity and expression, functional diversity or disability, social and

economic fragility, precarious employment, migration status, and nationality among other factors.

- o Identifying structural barriers and power relations favoring discrimination and violence, and obstacles to reporting or seeking for help.
- o Presenting measures to be adopted, aiming to prevent and combat additional vulnerabilities that may negatively impact victims-survivors.
- o Producing target materials for groups at higher risk of suffering sexual harassment.
- o Articulating with another structures or services endorsing equality, diversity and inclusion questions (e.g., International Relations Office, Equality Office).

- **Coordination mechanisms**

Coordination mechanisms must be formalized and strengthen by establishing strong networks in each higher education institutions that promote:

- o Articulation with management boards, structures and services, students' associations, security, staff' representatives, psychological responses, and academic and research units, with clear confidentiality norms.
- o External networks with governmental and non-governmental entities, and specialized services for sexual harassment victims-survivors, backed by written agreements, named contacts, and rapid referral procedures.
- o Regular interinstitutional meetings for complex cases, to ensure joint follow-up of high-risk victims-survivors.

5. Conclusion & Call to Action

Sexual harassment in higher education is not an episodic nor individual problem, it is a systemic expression of unequal power relations, cultural tolerance for gender-based violence, and institutional blind spots that continue to silence victims-survivors. Evidence collected by Uni4Equity proves that sexual harassment is a widespread and prevalent phenomenon demanding robust and multi-level interventions.

The ethical obligation of higher education institutions in responding to sexual harassment victims-survivors goes behind legal duties. The consolidation of academic environments in which dignity, safety, and justice core values is a question of Human Rights. Operationalizing sexual harassment institutional protocols, assessing and managing sexual harassment risk, avoiding revictimization and secondary victimization, safeguarding personal data and confidentiality, adopting trauma-informed approaches in psychological support services, ensuring follow-up

and reparation actions for victims-survivors, promoting an intersectional perspective and reinforcing coordination mechanisms are fundamental components of an ethics-driven institutional culture.

Data from the Uni4Equity Project shows that some sexual harassment protocols embrace an integrated and multi-sectoral model, based on diversity, equality and social justice. Nevertheless, further improvements must be achieved regarding higher education institutions capacity and competence to respond properly to sexual harassment cases, especially in terms of governance, implementation, monitoring and evaluation of sexual harassment protocols, and victims-survivors' protection and safety.
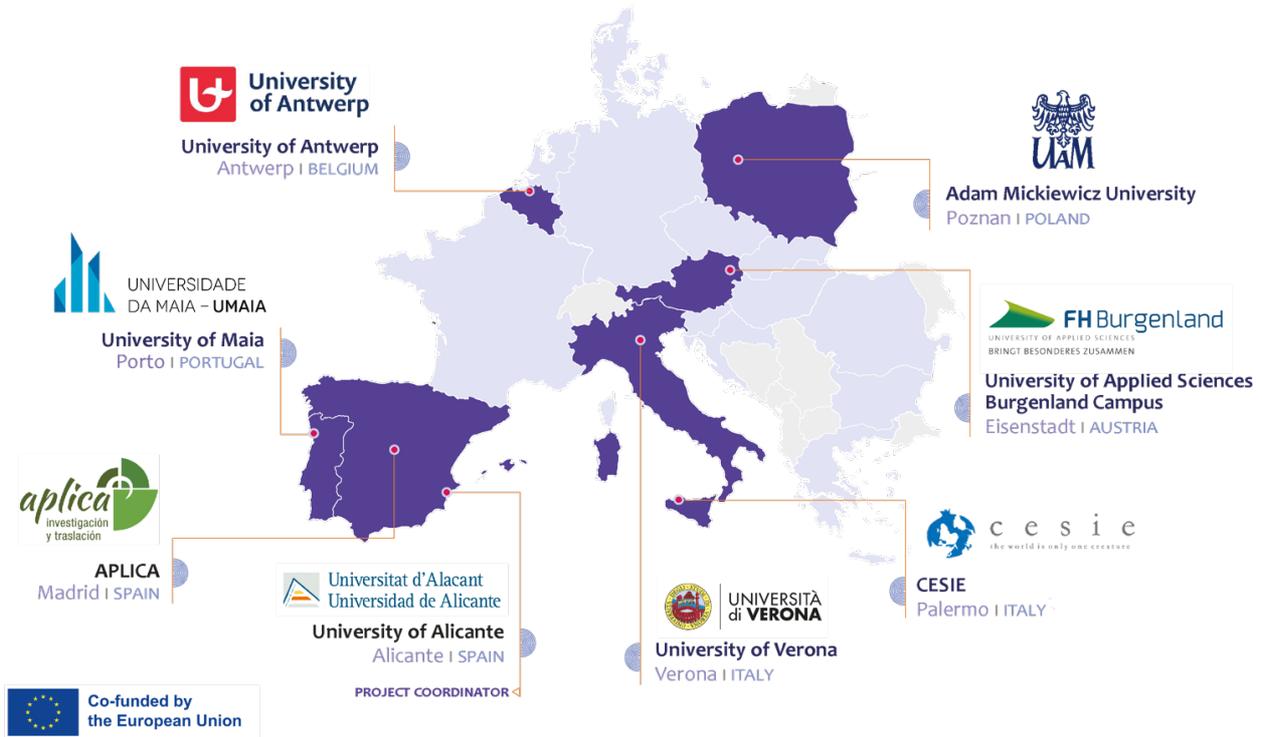
The call to action is clear. Higher education institutions must leave incident-responsive paradigms to embrace harm-preventing, individual-protective, culture-orientated and ethics-driven models when responding to sexual harassment victims-survivors. Sexual harassment does not have to be inevitable. It's sustained by a culture of victims-survivors' blaming which promote silence and invisibility. As culture is socially constructed, it can also be deconstructed. It is higher education institutions' responsibility to help deconstruct sexual harassment as a normalized or acceptable form of gender-based violence.

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