GenderSAFE
ENDING GENDER-BASED VIOLENCE IN ACADEMIA

Revised Model Policy Framework and Guidelines for Implementation

Marina Cacace and Diana Puerto Michaut

Third CoP meeting – Budapest, 21-22 October 2026

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From collective learning to practical tools

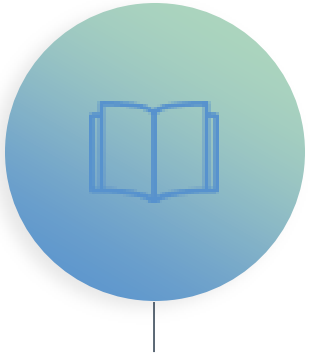
The GenderSAFE CoP has generated a wealth of knowledge and practical insights through thematic work, mutual exchange and testing

These contributions are now feeding into two key outputs



Model Policy Framework

Providing a reference framework for institutional policies addressing gender-based violence



Guidelines

Making the MPF more accessible and providing practical guidance for its adaptation and implementation

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What we have worked on: the sources

CoP sources

83 anonymised summaries/documents from:

- Circle Discord and in-person meetings
- Inter-circle meetings
- Testing meetings (in-person and online meetings, MELS, bilateral interviews)
- Relevant webinars

External sources

- 35+ sources from:
- EU policy documents
- Other policy sources
- UniSAFE research and tools
- 1752 Group materials
- Scholarly publications

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An iterative process



Coding

Using software for the analysis of qualitative materials (ATLAS.ti)



Consolidation

Organising all coded excerpts by MPF article in a structured Excel file, article by article



Development

Identifying relevant input, revising the MPF and drafting the Guidelines

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Example of coding (1,410 coded quotations overall)

Intersectionality_Discord Live 05_2025.pdf

Search Tools

gender-based violence to the Institution, victims/survivors or bystanders also file formal reports with law enforcement authorities.

Responding to the initial prompt, –What does your policy say to the relation to law enforcement, how should the institution be involved? – one participant from a Polish university distinguished the only two types of situations at their institution: **first,** when it's required by law to inform police / prosecutor's office (and then it's lawfully done), and **second**, when it's not required (and then rectors usually try to avoid it). **Rape** is a crime prosecuted ex officio. This means that 1. the rector is obliged to inform the police, 2. an investigation into such cases can be conducted even without the consent of the victim. However, lesser offences are not prosecuted ex officio. There are no additional internal regulations in place at their institution.

One participant from an Austrian university added that they had discussed it with the Austrian Ministry who said the university had to report criminally relevant cases. However, their legal advisor said they did not have to report it. Their institution had - so far - no policy.
A participant from a Danish university confirmed their internal regulations were organized the same way.

Legal support

One participant from a British university shared that it was up to the victim/ survivor to decide if and who they want to report criminal activity to - internally or externally (i.e. the police); if there's a police investigation taking place, then an internal investigation is suspended until that has concluded. If a case goes to court and involves a member of staff, they are given an opportunity to use the University's lawyers. An Austrian participant had discussed with their head of institution whether victim/survivors can use the lawyer of the university or the students ÖH. A con was the question of financial costs.

ART. 21 - Relation to Law Enfor... AB 16
MPF IMPLEMENTATION ISSU... AB 33
SECTION 06 - Reporting Mech... MC 75
Country_POLAND MC 4

ART. 21 - Relation to Law Enfor... MC 16
SECTION 06 - Reporting Mech... MC 75
COMMON CHALLENGES AN... MC 126

COMMON CHALLENGES AN... AB 126
ART. 21 - Relation to Law Enfor... AB 16
SECTION 06 - Reporting Mech... MC 75
Country_UK MC 6

Example of consolidation (screenshot of an Excel file for Art. 15)

	A	B	C	D
1	**document**	**quotation**	**codes**	**comment**
2	CEE - Discord 2025_01_31.pdf	Conflict of Interest: Consider situations where multiple functions are performed in mutual dependence as conflicts of interest. • Policy on Relationships: Institutions should have policies to prevent conflicts of interest arising from close relationships, including friendships and	SECTION 05 - Conduct and Responsibilities, ART. 15 - Conflict of Interest and Abuse of Power, 7P-Prevention	1
3	CEE - MPF Section 4 Comments.pdf	rticle 15.1 • I know that our case of Academy of Arts is specific, however from my point of view the sexual/romantic/intimate relationships are only part of the problems... there exists also the friendships, other dependencies in the nature of providing work opportunities elsewhere and this consists the conflit of the interest too...	ART. 15 - Conflict of Interest and Abuse of Power, SECTION 04 - Gender based Violence, LEGAL AND POLICY CONSIDERATIONS	
4	CEE - MPF Section 4 Comments.pdf	The discouraging or even prohibition of those relationship are difficult for our circumstances. Therefore we start with the reporting of the potential conflict of the interest and misuse of power..... We focus on the prevention of the negative impact into unequal treatment and the dynamics of the	SECTION 04 - Gender based Violence, ART. 15 - Conflict of Interest and Abuse of Power, LEGAL AND POLICY CONSIDERATIONS	
	General CoP - Discord 2025_03_27.pdf	Conflict of interest The same participant mentioned that for HR-related retaliatory behaviour, there is a great link with their institution's conflict of interest policy. They highlighted that a strong and explicit conflict of interest policy could be of great help and	ART. 15 - Conflict of Interest and Abuse of Power, GOOD PRACTICE EXAMPLES, ART. 23 - Protection Against Retaliation, SECTION 07 - Protection and precautionary measures, 7P-Protection, SECTION 05 - Conduct and Responsibilities, MPF IMPLEMENTATION ISSUES AND GUIDANCE	

10. GOOD PRACTICE EXAMPLES | 13. 7P-Prevention | 14. 7P-Protection | Base

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The Model Policy Framework

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The original Model Policy Framework, with its reds and blues



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A revised Model Policy Framework for Testers (January 2026)



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Updated Model Policy Framework (MPF)

January 2026 – Based on input from the Community of Practice and its Circles for the period October 2024 – November 2025. Changes are tracked in blue.

SECTION 1. GENERAL PROVISIONS

Art 2	2.1	This Policy is developed in accordance with and is intended to comply with the principles and requirements set forth in the following international legal instruments: Convention on the Elimination of All Forms of Discrimination against Women (CEDAW), Council of Europe Convention on preventing and combating violence against women and domestic violence (CETS No. 210), Directive 2024/1385 of the European Parliament and of the Council on combating violence against women and domestic violence, Directive 2012/29/EU of the European Parliament and of the Council of 25 October 2012 establishing minimum standards on the rights, support and protection of victims of crime, and replacing Council Framework Decision 2001/220/JHA, Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union law, the EU's antidiscrimination framework, including the Racial Equality Directive (2000/43/EC), Employment Equality Framework Directive (2000/78/EC), Gender Equality Recast Directive (2006/54/EC), and Goods and Services Directive (2004/113/EC), ...
Art 3		For the purposes of this Policy: a. "Bystander/Witness" means any person who observes or becomes aware of a situation of actual or suspected gender-based violence. b. "Contractors" means natural or legal persons, and their employees or subcontractors, who provide goods or services to the Institution under a contract, framework agreement, or similar arrangement, but who are not considered employees of the Institution. c. "Employees" means all persons engaged in an employment relationship with the Institution under a contract of employment, regardless of the duration or type of contract (permanent, temporary, full-time, part-time, or probationary). d. "Externals" means individuals or entities not formally affiliated with the Institution, but who interact with it in the course of professional, academic, or administrative activities (e.g., partners in joint projects, visiting lecturers, consultants, or members of advisory boards). e. "Institutional Community" includes [...] f. "Institutional Premises" means all property, facilities, and spaces owned, leased, used, or controlled by the Institution to conduct its activities, including campuses, residences, laboratories, offices, fieldwork sites, online platforms. g. "Reporting Party" means anyone filing an anonymous, informal, or formal report of gender-based violence. h. "Respondent Party" means the person or persons alleged to have committed an act of gender-based violence, as identified in a report under this Policy. i. "Students" means all individuals enrolled in any degree or non-degree academic programme or course offered or recognized by the Institution, including exchange students, visiting students, and those on internships or placements organized by the Institution. j. "The Institution" means the [Name of Institution], including all its academic and administrative units, research centres, and any affiliated or subsidiary entities operating under its authority. k. "This Policy" refers to [Name of the Policy] and any related procedures, guidelines, and annexes. l. "Visitors" means individuals present on Institutional Premises who are not employees, students, or contractors, including guests, family members, conference attendees, and members of the public attending events.

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Results

- Red paragraphs have been addressed
- Articles that were previously just outlined have been developed
- New articles have been added
- Substantive revisions to certain provisions have been made in response to CoP discussions

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Example: Red paragraphs addressed

26 .1. Investigation Committee. Composition and designation: internal and/or external, mixed? Permanent or ad-hoc? Who oversees the investigation for cases involving students and/or staff? Who selects and appoints? What is the exact role and mandate? Are conclusions decisive or is there another body that will decide on the final outcome?

26.1 The investigation committee shall be composed of three to five members, with at least one-third being external experts who have no employment or contractual relationship with the Institution, ensuring independence and specialised expertise in handling gender-based violence cases. When cases involve individuals from minoritised communities (including racial, ethnic, religious, LGBTQ+, disability, or other marginalised groups), the committee may include ad hoc members with relevant cultural competency and understanding of intersectional dynamics.

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Example: Development of articles

Article 3. Definitions

For the purposes of this Policy:

a. "The Institution" means [...]
b. Reporting Party: anyone filing an anonymous, informal or formal report of gender-based violence.
c. Contractors
d. Employees
e. Externals
f. Others includes people who work for the institution in other contractual relation than employee (such as freelancers)
g. Policy
h. Respondent Party
i. Students
j. Institutional Premises

For the purposes of this Policy:

"Bystander/Witness" means any person who observes or becomes aware of a situation of actual or suspected gender-based violence.

"Contractors" means natural or legal persons, and their employees or subcontractors, who provide goods or services to the Institution under a contract, framework agreement, or similar arrangement, but who are not considered employees of the Institution.

"Employees" means all persons engaged in an employment relationship with the Institution under a contract of employment, regardless of the duration or type of contract (permanent, temporary, full-time, part-time, or probationary).

Example: New articles

Article X –Risk Assessment

1. **Institutional Obligation to Conduct a Risk Assessment**
   The receipt of any report of gender-based violence by the Institution shall automatically trigger the obligation to conduct a risk assessment. This obligation applies irrespective of whether the report is anonymous or identified, and whether it is submitted through informal or formal channels.
2. **Aim of the Risk Assessment**
   The primary aim of the risk assessment is to identify, evaluate, and mitigate any actual or potential risks arising from the reported conduct, with a view to ensuring the safety and well-being of the victim/survivor, safeguarding the rights of all parties involved, and protecting the integrity and safety of the institutional community.
3. **Responsibility for Conducting the Assessment**
   The risk assessment shall be conducted by **[ROLE/UNIT WITHIN THE INSTITUTION]**, acting in accordance with this Policy and any applicable internal procedures.
4. **Sources of Information**
   The risk assessment shall be based on:
   a. the information contained in the report received by the Institution; and
   b. any preliminary information gathered by the Institution, where necessary, for the purpose of assessing risk.
5. **Content of the Risk Assessment**
   The risk assessment shall address, at a minimum, the following categories of risk:

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Example: Substantive revisions

Article 28. Evidence

28 .1. *Acceptable/unacceptable forms of evidence according to the different types of gender-based violence. (Screenshots, documents, outcry witnesses, memory log ...)*

28 .2. The alleged victim/survivor shall only be asked to give their testimony once, and it shall be appropriately recorded, to avoid re-traumatisation by requiring repeated recounting of their experiences. They have the right to add additional information to an original testimony at any time during the proceedings *until xx*. They also have the right to bring a support person with them to interviews and any hearing.

28 .3. Adjustments can be made to the disciplinary procedure to avoid re-traumatisation such as allowing testimony via video link, questioning Reporting Party and Respondent Party in separate hearings, etc.

"The Institution adopts a trauma-informed and flexible approach to evidence, recognizing that such incidents often occur in private settings where traditional documentation may be limited. All relevant evidence shall be considered and evaluated on its probative value, in accordance with this Article.

a. Accepted Forms of Evidence. The following constitute accepted means of evidence, without limitation:

• Digital Communications:

▪ Screenshots of text messages (WhatsApp, SMS, or other messaging platforms) [...]

b. Inadmissible Evidence. The following shall not be admitted:

• Evidence of the Reporting Party's prior sexual history or reputation.

• Evidence obtained unlawfully.

• Character evidence. "

The Guidelines

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Online guidelines

Both the Guidelines and the Model Poli

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Section-by-section guidelines

Section 1
General Provisions (Art. 1-3)

Section 2
Policy Statement (Art. 4-6)

Section 3
Scope (Art. 7-9)

Section 4
Gender-based violence (Art. 10-13)

Section 5
Conduct and Responsibilities (Art. 14-15)

Section 6
Reporting Mechanisms (Art. 16-21)

Section 7
Protection and Precautionary Measures (Art. 22-24)

Section 8
Investigation Procedures (Art. 25-29)

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Section 5
Conduct and responsibilities

Section description

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Art. 14 Duties

Art. 15 Conflict of interest and abuse of power

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The structure of article guidelines

- Article presentation
- Legal and Policy considerations
- Challenges
- Contextual factors
- Student perspectives
- RFO's perspectives
- National authorities' perspectives
- Implementation insights
- Promising practices
- Cited bibliography

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Next steps

- ✓ The Model Policy Framework will be reviewed by 3 experts in EU anti-discrimination law, labour law and intersectional perspectives

- ✓ The Guidelines will be revised by an editor to ensure easy and accessible reading for all

- ✓ The final deliverable will be published online before the GenderSAFE Final Conference on January 26, 2027, in Vienna (CEU)

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Thank you!

Questions? Comments? Let's discuss!

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