

# **Gender Based Violence Prevention Policy and Procedure**

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If there is an emergency or risk to life, please call 999 immediately.

## 1. Fife College Position on Gender-Based Violence

We Acknowledge that Gender-Based Violence (GBV) occurs in our institution and commit to preventing GBV, responding promptly with a trauma-informed approach, supporting those affected, and appropriately investigating GBV-related misconduct. GBV is particularly prevalent among students, with data showing 16-24 year old women as the most affected demographic, with 1 in 3 women experiencing some form of GBV ([Womens Aid](#)). However, GBV can impact anyone, and we provide anti-discriminatory support to all students and staff, regardless of protected characteristics or lifestyles.

In line with the Scottish Government's Equally Safe Strategy, we view GBV through a gendered lens, recognising it as both a cause and consequence of gender inequality. We are committed to transparency regarding GBV incidents in our institution, including publishing statistics on disclosures and disciplinary outcomes. Students who disclose or report GBV will not face disciplinary action for breaches related to drug consumption, underage alcohol consumption or academic misconduct if directly linked to the GBV incident. However, exceptions may apply to students in fitness to practice programmes, as determined by relevant regulations.

The GBV Policy will be reviewed on an annual basis by the Equality and Diversity Strategy Group. The review date will be the last meeting of the academic year.

## 2. What is GBV?

In line with the Scottish Government's Equally Safe Strategy, we define GBV as follows:

"Gender-based violence is a function of gender inequality and an abuse of male power and privilege. It includes actions that result in physical, sexual, or psychological harm or suffering to women and children, or affront to their human dignity. This includes threats, coercion, or arbitrary deprivation of liberty, occurring in public or private life. Men predominantly carry out such violence, with women being the primary victims. The term 'gender-based' emphasises the need to understand violence in the context of women's and girls' subordinate status in society. Such violence cannot be understood in isolation from the social norms, structures, and gender roles that influence women's vulnerability."

This does not mean that women do not use violence or carry out the actions described above. Nor does it mean that men are not the victims of these actions. It merely recognises that statistically men are commonly the perpetrators and women and children the victims.

The College recognises that marginalised groups, for example including persons with disabilities, and those in the LGBT+ community, may be at higher risk of experiencing gender-based violence and may have particular needs. As a college we provide tailored support to these groups through our Wellbeing and Support, Human Resources, and Organisational Development Teams.

### Examples of GBV (list not exhaustive)

- **Domestic abuse** refers to violence or abusive behaviour between people who are, or have been, in an intimate relationship. This includes romantic relationships, dating relationships, and any form of domestic or relationship abuse.

Intimate partner violence is a pattern of behaviours used by one partner to gain or maintain power and control over the other. This abuse can take many forms — physical, sexual, emotional, psychological, or economic — and may include threats or intimidation intended to influence or control another person. Importantly, abuse does not always end when the relationship does. An ex-partner can continue to be abusive after separation; this is known as post-separation abuse. It can involve harassment, stalking, manipulation, financial control, or attempts to undermine the victim's safety and wellbeing even after the relationship has ended.

- **Physical, sexual, psychological violence and financial/economic abuse** (for example physical assault, rape and sexual assault, coercive control etc.
- **Unwanted and unwelcome, sexual or gender-based verbal, written, online and/or physical conduct.**
- **Sexual harassment and intimidation** at College, work and in the public sphere.
- **Threatening or causing physical harm**, extreme verbal abuse, or other conduct which threatens or endangers the health or safety of any person.
- **Discrimination**, defined as actions that deprive other members of the community of educational or employment access, benefits or opportunities on the basis of gender.
- **Intimidation**, defined as implied threats or acts that cause an unreasonable fear of harm in another.
- **Bullying**, defined as repeated and/or severe aggressive behaviour likely to intimidate or intentionally hurt, control or diminish another person, physically or mentally.
- **Stalking**, defined as a pattern of repeated and unwanted attention, harassment, contact, or any other course of conduct directed at a specific person that would cause a reasonable person to feel fear of his or her safety or the safety of others e.g. unwanted gifts, sms messages, through social media.
- **Dowry related violence** – Dowry includes gifts, money, goods or property given from the bride's family to the groom or in-laws before, during or any time after the marriage. Dowry is a response to explicit or implicit demands or expectations of the groom or his family.
- **Forced and child marriages** -Forced marriage is when a person faces physical pressure to marry (e.g. threats, physical violence or sexual violence) or emotional and psychological pressure (e.g. made to feel like they are bringing shame on their family).
- **Honour crimes** involve physical, emotional, psychological, financial, in law abuse and sexual abuse, including murder, committed by people who want to defend the reputation of their family or community.
- **FGM** (Female Genital Mutilation), also known as female genital cutting and female circumcision, is the ritual removal of some or all of the external female genitalia.
- **Non-Consensual sexual image sharing**. Intimate image abuse refers to the non-consensual sharing of intimate images and videos. This is sometimes referred to as 'revenge porn' or 'image-based abuse'. This content can be shared in a multitude of ways including, in-person, through texts, emails and messages, on social media platforms, porn sites and in group chats. If you have been affected, please remember this isn't your fault and you haven't done anything wrong.
- Any other Fife College policy, rule or regulation, when a violation is motivated by the actual or perceived sex or gender identity of the victim maybe pursued using this policy.

## Other Definitions:

- Victim/Survivor: Someone personally affected by GBV
- Reporting platform: A tool for reporting GBV, either anonymously or with personal details.
- Precautionary Measures: Preventative steps taken to ensure student/staff safety following GBV disclosure.
- Safeguarding: Safeguarding refers to the policies, procedures, and practices in place to protect individuals from harm and ensure their safety and wellbeing. Click here for [Safeguarding policy](#)

### 3. Who is this policy for?

**This policy applies to everyone within our community — all students and all staff.**

It covers students at every level of study, across all campuses and locations, including those on placement. The same expectations, support, and standards of care also apply equally to all staff members.

### 4. Procedure for student reporting and staff reporting

**STUDENTS:** If you have experienced or witnessed gender-based violence (GBV), please report it to a member of staff or make an online report through [We Hear You](#).

**STAFF:** If you have experienced or witnessed gender-based violence (GBV), please report it to a member of staff or make an online report through [safe reporting hub](#)

All disclosures of GBV will be treated confidentially, except where there is reasonable reason to believe that there is an emergency and/or a serious risk to the physical or mental wellbeing of the member of staff or others (including children) see [safeguarding policy](#). In these circumstances, the Recipient of the Disclosure will, where it is safe and appropriate to do so, inform the student or member of staff about the steps that will be taken and how the information will be used or further disclosed. However, in exceptional situations where advising them could increase the level of risk, it may not be possible to make them aware in advance. In such cases, information will only be shared to prevent harm and in line with safeguarding responsibilities.

All disclosures of Gender-Based Violence will be handled with the utmost confidentiality. Information will be shared strictly on a need-to-know basis, and access to records will be limited to those directly involved in responding to and managing the disclosure.

#### **Student Procedure**

Response Procedure for Student GBV Reports – [“We Hear You”](#)

#### **1. Report Received**

##### 1.1 Anonymous Report

- Log the report in the reporting system.
- Monitor for patterns, repeat incidents, or identifiable risk factors.

##### 1.2 Disclosed Report

- Begin initial triage.
- Allocate a trained case handler to manage the report.

## 2. Initial Triage and Safety Assessment

Staff must take the following steps immediately upon receiving a disclosed report:  
Assess urgency and risk, including:

- Whether the student is in immediate danger.
- Whether the report indicates criminal activity.

Safeguarding considerations:

- Refer to the Safeguarding Lead if any safeguarding risk is identified.

Assign case handler:

- A LISTEN-trained staff member initiates case management and documentation.

## 3. Case Preparation

The case handler must:

- Review all information provided in the initial report.
- Check for any previous related reports, including repeat individuals, behaviours, or locations.
- Prepare an interview or engagement plan for the student and any witnesses.

## 4. Student Engagement (Disclosed Reports Only)

Where a student has identified themselves:

- Make contact using an appropriate and agreed communication method.
- Offer support, including counselling, advocacy, external agencies, and wellbeing services.
- Explain the GBV reporting process, confidentiality limits, and any safeguarding obligations.
- Obtain consent for further actions, except where safeguarding legislation requires otherwise.

## 5. Investigation Process

The investigation may include:

- Interviewing witnesses (students or staff).
- Speaking with any staff involved, if applicable.
- Gathering physical or digital evidence (e.g., messages, screenshots, CCTV, emails).
- Documenting all actions and evidence in a secure and respectful manner, following data protection requirements.

## 6. Decision-Making

### 6.1 Internal Resolution Options

- Mediation or facilitated conversations (if appropriate and safe).
- Student or staff disciplinary action.
- Safety measures or support plans for involved individuals.

### 6.2 External Referrals

- Referral may be required in the following circumstances:

Police:

- With student consent, or where there is a legal obligation due to criminal activity.

Social Services:

- If the individual is under 18 or considered a vulnerable adult.

## 7. Follow-Up Actions

### 7.1 Student Support

- Provide or signpost ongoing counselling or wellbeing support.
- Implement academic adjustments if necessary.

- Review and update safety plans as required.

#### 7.2 Staff Actions

- Implement training, guidance, or disciplinary steps where appropriate.
- Review staff conduct and ensure adherence to policy.

#### 7.3 Institutional Response

- Update any relevant risk assessments.
- Review and improve safeguarding and GBV response protocols.

### 8. Case Closure

Before case closure, the following must take place:

- Final review by the Safeguarding Lead or designated senior manager.
- Student informed of the outcome (for disclosed reports).
- Report anonymised for data tracking and trend analysis.
- Staff debrief for those involved in case management.
- Summary of case added to Sensitive Notes on REMS following data protection guidance.

### 9. Monitoring and Reporting

- Regular monthly or quarterly reviews of all GBV cases.
- Trend analysis to identify risks, inform training, and support prevention strategies.
- Annual institutional report to support transparency, accountability, and ongoing improvement.

## **Procedure for Staff Who Experience GBV – [Safe Reporting Hub](#)**

### 1. Receiving a Report

#### 1.1 Anonymous Reports

- Record the report in the Safe Reporting Hub system.
- Monitor for patterns, recurring individuals, or locations of concern.

#### 1.2 Disclosed Reports

- Begin initial triage immediately.
- Assign the case to a trained LISTEN/GBV case handler.

### 2. Initial Triage and Risk Assessment

The staff member receiving the report must:

Assess the level of urgency, including:

- Any immediate risk to the student.
- Any indication of criminal behaviour.

Consider safeguarding requirements:

- Escalate to the Safeguarding Lead where appropriate.
- Allocate the case to a trained handler to begin formal case management.

### 3. Case Preparation

The assigned case handler will:

- Review all details provided in the initial report.
- Check internal records for any previous related reports.
- Plan appropriate next steps, including interviews or information-gathering.

### 4. Meet with Victim/Survivor

If the staff member has identified themselves:

- Make timely, sensitive contact.
- Offer support options (wellbeing, counselling, advocacy).

- Explain the Safe Reporting Hub process, confidentiality, and safeguarding limits.
- Seek consent for further actions unless overridden by statutory safeguarding duties.

## 5. Investigation Process

Depending on the nature of the report, the case handler may:

- Interview witnesses (students or staff).
- Engage involved staff members where relevant.
- Collect and review physical or digital evidence (messages, screenshots, CCTV, etc.).
- Ensure all information and actions are recorded securely and respectfully.

## 6. Decision-Making

### 6.1 Internal Outcomes

- Mediation or facilitated dialogue (where safe and appropriate).
- Student or staff disciplinary procedures.
- Implementation of safety plans or additional support.

### 6.2 External Referrals

- Referral may be required in the following circumstances:

Police:

- With student consent, or where a legal duty to report exists.

Social Services:

- For vulnerable adults.

## 7. Follow-Up Actions

### 7.1 Staff Support

- Continue to offer or arrange counselling or wellbeing support.
- Provide reasonable adjustments if required.
- Update safety plans as necessary.

### 7.2 Staff Actions

- Provide training, guidance, or support as indicated by the case.
- Initiate formal HR/disciplinary procedures if relevant to staff behaviour.

### 7.3 Institutional Actions

- Update risk assessments.
- Review GBV and safeguarding procedures for improvement.

## 8. Case Closure

Before closing the case:

- The Safeguarding Lead or senior manager will conduct a final review.
- The staff member will be informed of the outcome (for disclosed reports).
- The case will be anonymised for monitoring and trend analysis.
- A staff debrief will be held.
- A summary will be added to ask HR where this will be stored

## 9. Monitoring and Reporting

- Monthly or quarterly review of cases logged through the Safe Reporting Hub.
- Trend analysis to inform prevention initiatives and staff training.
- Annual reporting to support transparency, accountability, and continuous improvement.

## 4.1 Reporting: what happens next

If a report is made through, [We Hear You](#) (students) or [Safe Reporting Hub](#) (staff) with personal details provided, the College will respond within **two working days**. Reports will be risk-assessed, with high-risk cases prioritised. For emergencies, victims should call 999 instead of using the reporting platform. Anonymous reports cannot be followed up directly, but we encourage seeking support through the [College support services](#) or external organisations such as [Fife Womens Aid](#), [FRASAC](#) and [EndGBV](#). We may act on anonymous reports if they pose a risk to the safety of the College community or the public.

## 4.2 Precautionary Measures

### **Fife College Position on Students or staff under Investigation or where an Accusation has been Reported**

The College cannot automatically remove a student or staff member solely because they are subject to an investigation, as there are no charges or criminal convictions. However, where there is a clear and evidenced safeguarding risk, we have a duty to consider temporary measures to protect the safety and wellbeing of our community.

Our approach must be balanced and risk-based, not assumption-based. Police investigations can take months or even years, and the student or staff member may never be convicted. Immediate exclusion could breach principles of natural justice, disproportionately impact the student's/staff members' job/education and future, and expose the College to legal challenge.

At the same time, the College has statutory duties to:

- Protect students and staff from harm.
- Maintain a safe learning environment.
- Comply with safeguarding legislation.

We cannot ignore a credible risk, even in the absence of a conviction. Neither principle overrides the other; therefore, decisions must be informed by a thorough risk assessment, considering:

- The nature of the allegation (without determining guilt).
- Whether students share timetables, classes, accommodation, or placements.
- If it is a member of staff consider location and timetables
- Any previous concerns or patterns of behaviour.
- Advice from the police (within information-sharing limits).

Based on this assessment, proportionate interim measures may be implemented. These measures are protective, not punitive, and will be reviewed regularly. Examples include:

- Timetable adjustments to prevent contact.
- No-contact agreements.
- Remote or blended learning options where appropriate.
- Support plans for all affected students.
- Support plans for affected staff.

It is essential that any adjustments are clearly communicated as temporary safeguarding measures, not disciplinary sanctions.

### 4.3 Support for staff and students

The college offers a range of support for GBV victims/survivors, including counselling, academic adjustments, signposting to financial and accommodation assistance. Details of student support pages can be found [here](#). Details of staff support can be found [here](#).

### 4.4 Investigative process

If the reported person is a member of the Fife College community (staff or student), the victim/ survivors may choose to have the college investigate the incident through [Positive Behaviour Policy \(students\)](#) or [Bullying and Harassment policy \(staff\)](#)

### 4.5 Reporting to the police

If the incident may constitute a criminal offense, our Student Support Advisors (students) and Human Resources (staff) can assist students and staff in reporting it to the Police. This is a personal choice and there is no pressure to report to the Police unless there is a risk to anyone in the College community.

### 4.6 Non-Disclosure Agreement

Fife College strictly prohibits the use of Non-Disclosure Agreements (NDAs) in cases of Gender-Based Violence (GBV). We consider the use of NDAs in this context to be incompatible with our institutional values.

### 4.7 GBV prevention and staff training

All staff are required to complete essential modules that are to be completed either in the first week or first month of employment, details of these are below - The [Sexual Harassment course](#) must be completed within the first month of employment. There are also courses such as [Safeguarding Adults](#), [Safeguarding Children](#) (must be completed within one week of employment) and [Equality Diversity and Inclusion](#) (must be completed within 1 month of employment) these all include elements relating to Gender Based Violence.

#### Sexual Harassment training learning outcomes -

- Understand how to prevent sexual harassment at work
- Be able to better identify cases of sexual harassment at work
- Know how to properly report sexual harassment in the workplace

#### Safeguarding Adults learning outcomes -

- Learn about what groups of adults might be at risk
- Understand and work towards compliance with The Mental Capacity Act and other legislation
- Learn about the different types of abuse that adults might experience and how to effectively deal with it should it occur

## **Safeguarding Children learning outcomes -**

- Learn how to work towards best practice in line with the Children's and Young Persons Act 2008
- Learn how to recognise the signs of abuse in a child and the importance of a child centred approach
- Understand the importance of reporting and recording circumstances or evidence of abuse

## **Equality, Diversity and inclusion training learning outcomes -**

- Understand the Equality Act 2010 and learn about protected characteristics
- Understand the types of discrimination, including direct, indirect, harassment and victimisation
- Know how to treat others with respect and offer everyone fair access to opportunities

All staff who handle GBV disclosures are trained using the EmilyTest LISTEN framework. This training is available for all staff with training opportunities delivered monthly or directly to full teams during staff development training.

The EmilyTEST website provides an overview of its LISTEN training programme, summarised as follows -

*“Attendees will be guided through a two-hour training programme. They will work through each step of L.I.S.T.E.N. with our qualified trainer, learning how to assess the level of risk of harm or abuse to the reporting student, reported student and/or extended community. They will be able to categorise this as being high/medium/low, ensuring appropriate action is taken to enhance the safety of the student by following their institution’s internal procedures and signposting students appropriately. The training includes confidentiality, note taking and escalation procedures tailored to your institution. Upon completion of the training programme, attendees will:*

- Understand a basic definition of Gender-Based Violence (GBV)
- Be able to confidently respond to a disclosure of GBV
- Be able to identify and apply the steps of the L.I.S.T.E.N. framework appropriately
- Understand how to assess risk in GBV disclosures and take necessary action
- Be able to identify escalation contacts and signpost individuals to relevant resources and support services”

[EmilyTEST website](#)

## **5. Other Relevant Documentation**

### **Other policies relating to GBV policy (staff)**

- [Code of Conduct for Staff](#)
- [Bullying and Personal Harassment Policy and Procedure](#)
- [Health and Safety Risk Assessment Policy and Procedure](#)
- [Health and Safety Prevention of Violence and Aggression to Staff Policy and Procedure](#)
- [Staff Disciplinary Policy](#)
- [Safeguarding policy](#)
- [Social Media Policy](#)

**Other policies relating to GBV policy (Students)**

- [Misuse of Drugs and Alcohol Policy](#)
- [Safeguarding Policy](#)
- [Anti Harassment and Bullying Policy](#)
- [Positive Behaviour Policy](#)
- [Social Media Policy](#)