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GenderSAFE Policy Brief 1

Beyond Symbolic Commitment: Taking a Zero-Tolerance Approach to Counteracting Gender-Based Violence

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Partners



SUMMARY

Gender-based violence is a pervasive issue that encompasses a continuum of behaviours, from microaggressions to physical and sexual violence. The EU-funded GenderSAFE project seeks to establish safe, inclusive, and respectful environments in research and higher education institutions by introducing zero-tolerance policies against gender-based violence, aligned with the Zero-Tolerance Code of Conduct (European Commission, 2024).

Based on the initial studies published by the project, this first policy brief provides higher education and research institutions and other stakeholders with insights into existing policy approaches on the zero-tolerance approach (Bondestam et al., 2024) and the needs of people in specific at-risk positions and situations (Michlová et al., 2024). Structured along the main components of the Zero-Tolerance Code of Conduct (European Commission 2024), it provides actionable recommendations for institutions to develop cultures that recognise the structural nature of gender-based violence and take seriously all forms of gender-based violence, enforce compliance, foster trust, and by doing so, encourage a culture where victims/survivors feel supported to come forward.

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LIST OF ABBREVIATIONS AND ACRONYMS

EU	European Union
LGBTQIA+	Lesbian, Gay, Bisexual, Transgender, Queer or Questioning, Intersex, Asexual, and others sexual orientations, gender identities, and expressions
GenderSAFE	Advancing the zero-tolerance approach to gender-based violence in higher education and research in the European Research Area (project name)
UniSAFE	Universities implementing changes for safe environments Area (project name)

INTRODUCTION

Gender-based violence is increasingly understood as a continuum, encompassing a wide spectrum of behaviours ranging from subtle acts of misconduct to overt and severe physical or sexual violence. Within the continuum framework, 'violence' serves as an umbrella term to capture all stages of this spectrum. Addressing this potential progression along the continuum is critical to fostering institutional cultures that are inclusive, respectful, and safe.

The EU-funded GenderSAFE project supports research and higher education institutions in establishing safe, inclusive, and respectful environments by setting up comprehensive policies. Building on the [Zero-Tolerance Code of Conduct](#) (European Commission, 2024) which outlines the key elements of a zero-tolerance framework for combating gender-based violence by all stakeholders in the European Research Area, GenderSAFE advances this approach in relation to higher education and research organisations. By fostering institutional cultures that uphold gender equality and unequivocally reject all forms of gender-based violence, GenderSAFE addresses the full spectrum of unacceptable behaviours – ranging from subtle, less visible instances to explicit acts of violence. For decision-makers, this project offers policy framework as well as practical tools to recognise the structural nature of gender-based violence and take seriously all forms of gender-based violence. In doing so, decision-makers can enforce compliance and foster trust, and by doing so, build a culture where victims/survivors feel supported to come forward.

EVIDENCE, ANALYSIS, AND RECOMMENDATIONS

In the initial stage of the project, existing policy approaches on the zero-tolerance approach were reviewed (Bondestam et al., 2024). The needs of people in specific minoritised positions or at-risk situations were also analysed, especially women, LGBTQIA+ persons, those in precarious employment, mobile researchers, researchers facing intersectional inequalities, and people at risk of psychological and other forms of violence related to asymmetries of power (Michlová et al., 2024). The findings from these two studies are presented below, structured along the main components of the Zero-Tolerance Code of Conduct along with concrete recommendations.

STRONG DETERRENCE

A zero-tolerance approach can serve as a powerful deterrent against gender-based violence by ensuring that all incidents are taken seriously and addressed with proportionate redress measures and sanctions. However, the GenderSAFE analyses reveal a complex interplay between deterrence and institutional responses, reflecting conflicting perspectives on the effectiveness of the zero-tolerance approach.

On the one hand, in some contexts, strict sanctions associated with a zero-tolerance approach may discourage reporting, as individuals might fear that perpetrators will face excessively severe punishments (Bondestam et al., 2024). This concern has led some to question the practicality of a strong deterrence model.

On the other hand, the needs assessment analysis highlights widespread institutional failures in responding to gender-based violence, demonstrating that **the greater challenge lies not in excessive sanctions but rather in the persistent lack of institutional accountability.** Key institutional shortcomings include (Michlová et al., 2024):

1. **Failure to recognise misconduct:** Behaviours, particularly those rooted in cultural norms or intersecting with other forms of discrimination, are often not acknowledged as gender-based violence.
2. **Minimisation of incidents:** Victims/survivors are frequently dismissed or accused of overreacting, with institutions downplaying the seriousness of reported misconduct.
3. **Failure to act:** Institutions frequently neglect to address reports of gender-based violence, leaving victims without support or redress.
4. **Individualisation of reports:** Victims/ survivors are pressured to view reported violence as a "personal matter" and discouraged from seeking institutional intervention.
5. **Backlash and retaliation:** Survivors and bystanders often face threats, silencing tactics, and retaliation for speaking out.
6. **Nepotism and collusion:** Institutions, particularly when perpetrators hold positions of power, frequently close ranks, protecting offenders rather than holding them accountable.

Additionally, the inadequacy of disciplinary actions and sanctions is a recurring issue. In many cases, no sanctions are imposed, and reported incidents are simply ignored until the reporting party gives up. When action is taken, it is often superficial and situational, such as giving perpetrators a mere warning, or transferring them to another department without further monitoring. Only in rare cases does an investigation lead to appropriate sanctions.

For victims, survivors, and bystanders, the absence of real consequences undermines trust in the system. Holding perpetrators accountable sends a crucial message – not only to survivors seeking justice but also to the broader community – that gender-based violence will not be tolerated.

Thus, concerns that zero-tolerance policies may be impractical because they are considered as too severe and deter people from reporting miss a more pressing reality: the predominant failure of institutions to take suitable actions and impose sanctions at all. **Rather than an excess of punitive measures, it is institutional inaction that poses the greatest barrier to addressing gender-based violence effectively.**

- ➔ A zero-tolerance approach is about ensuring accountability and dismantling institutional cultures that enable violence. **Institutions must move beyond symbolic commitments to implement concrete, systemic reforms that prevent, address, and sanction gender-based violence effectively.**

CLEAR MESSAGE

A zero-tolerance approach sends an unequivocal message that all forms of gender-based violence are unacceptable. However, findings from GenderSAFE's analysis of the needs of minoritised and at-risk groups (Michlová et al., 2024) reveal that institutions often fail to communicate a clear and consistent stance against gender-based violence. Ambiguities in policy language, limited awareness of reporting mechanisms, and inadequate dissemination of information contribute to uncertainty about what constitutes misconduct and where to seek support.

Effective communication is essential not only in policy design but also in its continuous implementation. Michlová and colleagues' analysis (2024) highlights the insufficient visibility of institutional policies and support structures, with people who work under a precarious contract facing particular difficulties in accessing information about policies as well as institutional resources.

Moreover, the analysis of existing zero-tolerance policies in higher education and research (Bondestam et al., 2024) underscores that many remain symbolic rather than substantive, lacking clear definitions and enforcement mechanisms. To prevent superficial adoption, institutions must ensure that policies are operationalised through comprehensive frameworks and actionable measures.

The following recommendations contribute to ensuring a clear institutional message about unacceptance of any form of gender-based violence.

→ Introduce Zero-Tolerance Policies:

- **Develop clear and comprehensive definitions of all forms of gender-based violence**
 - **Explicitly recognise and address microaggressions** as part of gender-based violence policies.
 - **Acknowledge and conceptualise hierarchical abuses of power** as forms of gender-based violence.
 - **Acknowledge the structural nature of intersecting inequalities and ensure comprehensive treatment of the intersectional nature** of gender-based violence.
 - Develop clear processes to transition from symbolic gestures to **concrete actions, procedures and responsibilities**.
 - **Embed zero-tolerance principles into broader institutional strategies**, such as **Gender Equality Plans**, to reinforce inclusivity and safety, and to work towards changing institutional cultures.
- **Raise awareness** of unacceptable behaviours and available support systems through extensive communication campaigns.
- **Enhance policy communication and accessibility** through the use of infographics and flowcharts, providing step-by-step guidance, namely for entry points, reporting and investigation processes, appeal procedures, roles and responsibilities of authorised bodies. Integrate proactive communication strategies, such as incorporating policy information into onboarding materials for new students and employees and ensuring that all institutional members are aware of the policies and procedures in place.
- **Develop capacity-building about all forms of gender-based violence** through regular training sessions, mandatory for decision-makers and managers.

INSTITUTIONAL CHANGE

Gender-based violence is embedded in hierarchical power structures, requiring an institutional change towards a zero-tolerance approach rather than placing the burden on individuals. Current gender equality policy in EU research and innovation increasingly emphasises the need to move from “*fixing women*” to “*fixing institutions*” and “*fixing knowledge*” (Linková & Mergaert, 2021). However, in the context of neoliberal academia, where individualisation and personal choice are dominant values, the power structures that shape and constrain people’s choices often remain invisible. The individualisation of gender-based violence remains a key barrier to effective institutional responses.

Interviews with at-risk groups reveal that institutions frequently frame gender-based violence as a personal issue – treating incidents of abuse, discrimination, or violence as matters of individual perception by the survivor/victim, or as isolated failures of the perpetrator, rather than recognising them as manifestations of deeper cultural and structural deficiencies within the institution (Michlová et al., 2024). Institutions must shift focus from isolated case management to system-wide prevention and accountability, addressing the root causes of violence and not only its symptoms.

Enhancing Institutional Capacity for Case Handling

Shifting the responsibility for addressing gender-based violence to a systemic level entails the re-evaluation of the roles and capacities of personnel handling cases. Institutional responses often lack sensitivity due to inadequate training of staff handling cases, the limited diversity of the staff, and failure to recognise intersectional experiences, particularly for non-binary individuals and marginalised groups. This leads to mistrust and potential re-traumatisation of survivors.

To improve their capacity to handle cases, institutions must:

- **Ensure the allocation of institutional resources for policy implementation, monitoring and evaluation, including communication, capacity building and training, and service provision.**
- **Recruit and train staff for case handling – and not only in procedural aspects, to ensure trauma-informed case handling, build survivor trust and accountability and address the underlying systemic causes of gender-based violence.**
- **Ensure the diversity of the staff responsible for case handling.**

Addressing Gaps in Mental Health and Support Services

A zero-tolerance approach requires a shift in institutional culture to better consider the mental health of victims and survivors. Victims/survivors of gender-based violence frequently face insufficient psychological, legal, and social support. Institutional services are often underfunded, short-term, or inaccessible, leaving survivors without long-term care.

To ensure victim- and **survivor-centred responses**, institutions are encouraged to:

- **Invest in sustainable mental health services.**
- **Train case managers and investigators in trauma-informed and victim- and survivor-centred approaches, ensuring the protection of victims/survivors and fair processes for all parties.**
- **Provide peer-support options to build trust.**

Embedding Intersectionality in Institutional Change

A zero-tolerance approach signifies an unambiguous stance towards gender-based violence, signalling that all forms of minoritisation, including – and especially – those rooted in intersecting inequalities, will not be accepted. Current institutional policies often fail to address gender-based violence from an intersectional perspective, and the specific needs of non-binary, LGBTQIA+ individuals, people of colour and from ethnic minoritised groups, people with chronic illness and disabilities, and staff and students in at-risk situations (internationally mobile, on field trips, on various precarious contracts).

Gender-based violence policies must fully integrate intersectionality to avoid performative diversity efforts and ensure meaningful, institutional change.

- **Ensure institutional policies explicitly incorporate intersectional dimensions to address the compounded vulnerabilities of minoritised groups.**
- **Integrate tailored support mechanisms for at-risk groups, including LGBTQIA+, ethnic minoritised groups, persons with disabilities, and those in precarious or mobile roles.**
- **Train case managers and investigators in sensitive communication, particularly in relation to non-binary and transgender victims/survivors.**
- **Ensure that all members of the institution, including staff and students have equal access to information and services.**

CLARITY OF INTENT

Adopting a zero-tolerance approach clearly defines an institution's stance and commitment to addressing gender-based violence. However, findings from the needs assessment (Michlová et al., 2024) reveal widespread ambiguity in both definitions of misconduct and institutional procedures, leading to uncertainty about what constitutes a policy violation and how to report it.

Clear Definitions and Policy Scope

Many individuals struggle to recognise microaggressions and non-physical gender-based violence as violations of institutional policy. As a result, **there is widespread uncertainty about whether such behaviours – including psychological and emotional abuse – warrant reporting.** This issue is exacerbated by narrowly focused communication campaigns that emphasise only severe physical harassment, leaving other harmful behaviours unaddressed and unreported.

Ensuring Fair and Impartial Investigations

The needs assessment highlights critical issues of bias and conflict of interest in institutional investigations. Instances were reported where survivors had to file complaints with their own supervisors or with close colleagues of the perpetrator, undermining trust in the process.

- **To ensure credibility and fairness, institutions should establish independent investigative bodies or employ external investigators to eliminate conflicts of interest.**

Transparency and Victim/Survivor Protection

The zero-tolerance approach encourages reporting by providing transparent procedures, entailing a 'culture of coming forward' (Fikejzová & Linková, 2025). To this day, investigation processes are frequently disorganised and lack essential protective measures. Reporting parties are often unaware of what is required of them, such as evidence submission guidelines; who they will encounter during the process; what institutional protections are in place for them.

- **Institutional reporting systems should be transparent and accessible, with clearly defined staff roles and responsibilities for case handling, while providing anonymous reporting as an entry point.**
- To improve transparency, **institutions must clearly communicate investigation procedures, ensure impartiality, confidentiality of the reporting persons, ongoing support, and protect survivors from retaliation throughout the process.** The investigation process should be clearly communicated up front, including requirements related to giving testimony, evidence submission, and the individuals that reporting parties will encounter during the investigation.
- **Case admissibility should be clearly defined**, to avoid instances where a report is rejected without substantiation.
- **Institutions should provide options for the adjustment of work or study obligations.**

FOCUS ON REHABILITATION AND HEALING

Rehabilitation is a cornerstone of institutional change, addressing the root causes of gender-based violence while fostering institutional healing and sustained improvement. Traditional approaches often focus solely on punitive measures, treating cases as individual failures without considering the systemic structures that enable such behaviours. Rehabilitation shifts this narrative by emphasising education, accountability, and the prevention of future harm. Programmes should provide perpetrators with the tools to recognise the impact of their actions, challenge harmful beliefs and attitudes, and take responsibility for their behaviour. This approach not only aims to prevent repeat offences but also promotes a broader cultural shift within the institution.

Rehabilitation programmes must be designed with survivor safety as a priority, ensuring that their well-being is never compromised. In addition to addressing individual cases, these programmes can serve as complementary to or alternatives for sanctions, helping to dismantle the structural power imbalances that perpetuate violence and discrimination. By integrating rehabilitation into their institutional frameworks, institutions can demonstrate a commitment to addressing systemic issues, fostering an environment where accountability and cultural transformation go hand in hand.

Rehabilitation also contributes to institutional healing, signalling a departure from purely reactive measures toward proactive strategies that promote long-term safety and inclusivity. By acknowledging the harm caused not only at individual but also at institutional level, and by making an intentional and explicit commitment to creating a more resilient and fairer system, trust in institutions can be restored.

PLEDGE FOR ZERO TOLERANCE TO GENDER-BASED VIOLENCE!

The Zero-Tolerance Code of Conduct (European Commission 2024) sets out a common approach, definitions, and a list of principles to guide all stakeholders and individuals in the ERA, to create a European Research and Innovation environment free from all forms of gender-based violence, based on the values of gender equality and inclusiveness, respect, dignity and safety.

Institutions and individuals are encouraged to take a bold stand against any form of gender-based violence and commit to its principles, by taking the pledge available at <https://gendersafe.eu>

FURTHER READING

Bondestam, F., Strid, S., Fikejzová, M., & Linková, M. (2024). *D2.1 GenderSAFE - Report on zero-tolerance approaches to gender-violence in higher education and research*. Zenodo. <https://doi.org/10.5281/zenodo.13380251>

Fikejzová, M., & Linková, M. (2025). *Gender-based violence in academia: making the concept of zero tolerance matter to institutional change*. *Journal of Higher Education Policy and Management*, 1–16. <https://doi.org/10.1080/1360080X.2024.2448433>

Michlová, M., Oliva, E., Fikejzová, M., & Linkova, M. (2024). *D2.2 GenderSAFE - Needs Assessment Report Addressing Intersectionality, Precarity and Mobility*. Zenodo. <https://doi.org/10.5281/zenodo.13380368>

European Commission: Directorate-General for Research and Innovation, *Zero-tolerance code of conduct – Counteracting gender-based violence, including sexual harassment, in the EU research and innovation system*, Publications Office of the European Union, 2024. <https://data.europa.eu/doi/10.2777/044501>

SUSTAINABILITY AND LEGACY

The GenderSAFE project, active until March 2027, is dedicated to fostering safe, inclusive, and respectful environments in European research and higher education institutions. By strengthening zero-tolerance policies, building capacity through targeted training, and developing tools to monitor progress, the project ensures a unified and impactful approach to addressing gender-based violence.

The GenderSAFE Community of Practice (CoP) with its five circles works to advance institutional responses to gender-based violence through mutual learning and the development of a model policy framework. By creating a sustainable network of stakeholders committed to zero-tolerance approaches, the CoP ensures long-term progress towards safer, more inclusive environments in higher education and research.

PROJECT OBJECTIVES AND METHODOLOGIES

Building on the research insights, tools, and recommendations developed in the UniSAFE project, GenderSAFE specifically aims to:



Strengthen zero-tolerance policies: aiming to create a unified policy approach in the EU by incorporating the latest theoretical insights, focusing on power dynamics, intersectionality, mobility, and precarity.



Support higher education and research institutions in improving and implementing existing policies: gathering stakeholders from various contexts to co-design and share zero-tolerance policies on gender-based violence, in line with the EU baseline code of conduct, fostering mutual learning and support.



Build institutional capacities: training dedicated staff and a pool of trainers to help organisations develop and implement effective policies against gender-based violence.



Monitor policies at national and institutional levels: developing tools to gather and monitor comprehensive data on how zero-tolerance policies are adopted and implemented across the EU, creating a valuable resource for future efforts.



Raise awareness and advocate: advocating for decision and policy-makers to adopt a zero-tolerance approach to gender-based violence and engaging stakeholders to take up our outputs.

GenderSAFE relies on the 7P model (Strid et al., 2021, Mergaert et al., 2023), a holistic framework to support institutions in addressing gender-based violence. At the core is the measure of prevalence of gender-based violence, with the aim to understand institutions' roles in prevention, protection, prosecution, provision of services, supported by partnerships and policies.

The project's outputs will feed the UniSAFE toolkit which offers higher education institutions and research organisations involved at all stages in addressing gender-based violence much-needed operational tools.

FIND OUT MORE ABOUT GENDERSAFE

<https://gendersafe.eu/>

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 [@gendersafe-eu.bsky.social](https://bsky.app/profile/gendersafe-eu.bsky.social)