



*Working draft for discussion and
open to amendment through the Conference proceedings.*

**EUROPEAN CODE OF CONDUCT
for Universities, University Alliances and Academic Networks
on the Prevention of and Response to Gender-Based Violence
against Women and Domestic Violence**

In support of the implementation of the *Council of Europe Convention on Preventing and Combating Violence against Women and Domestic Violence* (Istanbul Convention, CETS No. 210).

This document was proposed in the framework of the Second Pan-European Conference organised by the academic network UN.I.RE. (UNiversità In REte contro la violenza di genere), in collaboration with OCEAN (Open Council of Europe Academic Networks – Council of Europe), entitled “*Implementing the Istanbul Convention after the EU’s Accession in Academia: Backlash, Gaps and Institutional Responsibility.*” - University of Milano-Bicocca, 21 September 2026.

How to Use this Code

This Code is a practical European framework for universities and other higher education organisations.

It can be used to:

- review existing policies and procedures;
- identify gaps;
- strengthen prevention and support;
- improve reporting and response mechanisms;
- coordinate action across university alliances, academic networks and mobility programmes;
- monitor progress over time.

The Code does not require institutions to create parallel structures where effective policies, services or procedures already exist.

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- **Articles 1–25 set out the common commitments of signatories.**
- **Annex I contains recommended practices and a practical protocol for academic mobility.**
- **Annex II is an implementation and self-assessment tool.**
- **Annex III – Institutional Implementation Record.**

Institutions may implement the Code progressively and adapt its practical arrangements to their national legal framework and institutional structure.

Preamble

Gender-Based Violence Against Women (GBVAW) and Domestic Violence (DV) affect universities as places of study, work, research and social life.

Universities have an important role in preventing violence, supporting those affected, promoting equality, producing knowledge and contributing to wider social change.

This Code translates the principles of the Istanbul Convention into a common set of practical commitments for higher education and research organisations.

It is designed to be accessible to institutions operating under different legal systems, governance models and levels of experience.

The Code may be formally adopted by institutions with responsibility for implementing its commitments.

It may also be endorsed by organisations that support its principles but do not themselves have responsibility for all areas covered by the Code.

The Code builds on the Istanbul Convention (CETS No. 210), relevant national frameworks and the experience developed by the academic network UN.I.RE. It complements and supports the implementation of gender equality plans adopted at the institutional level.

Chapter I – General Provisions

Article 1 – Purpose and Scope

1. This Code provides common standards and practical commitments for preventing and responding to GBVAW and DV in universities, higher education institutions, university alliances and participating academic organisations across Europe.

2. It supports the implementation of the Istanbul Convention in academic settings and complements national law, collective agreements and existing institutional policies.

3. It applies to the academic community, including students, doctoral candidates, researchers, academic and administrative staff, visiting scholars and other people participating in institutional activities.

4. The Code covers prevention, support and institutional response in relation to conduct occurring:

- on campus;
- online;
- in university accommodation;
- during institution-organised activities;
- during fieldwork, placements and conferences;
- during academic mobility;
- in other contexts where there is a relevant connection with the institution.

5. Where GBVAW or DV takes place outside the institution's disciplinary jurisdiction, the institution should still provide appropriate information, support, referral and safety measures for members of its community where possible.

6. The Code does not extend an institution's disciplinary authority beyond what is permitted by national law or its existing rules.

Article 2 – Definitions

For the purposes of this Code, definitions of GBVAW, DV, gender, due diligence correspond to the definitions of the Council of Europe Istanbul Convention and EU Directive 1385/2024.

With regard to the specific scope of this code, the following definitions apply:

e. Victim/survivor: a person affected by conduct covered by this Code, whether or not they make a formal complaint.

f. Signatory institution: a university, higher education institution or other academic or research organisation with the authority and capacity to implement the commitments in this Code and which formally adopts it.

g. Signatory alliance or consortium: a university alliance or consortium that formally adopts the Code for matters falling within its own responsibilities and encourages or coordinates implementation among its member institutions.

h. Endorsing organisation: an academic network, association, faculty, institute or other organisation that publicly supports the principles of the Code but does not necessarily have the authority to implement all its commitments.

i. Academic network: a national or cross-border network of academic institutions working together on the prevention of and response to GBVAW and DV, such as UN.I.RE.

j. Focal point: the person, office or service designated as a clearly identifiable contact for matters covered by this Code.

Article 3 – Guiding Principles

- **No Tolerance for Violence:** GBVAW and DV are not accepted as part of academic or working life. Every disclosure should be taken seriously and receive an appropriate response.

- **Victim/Survivor-Centred Approach:** safety, dignity, autonomy and informed choice come first.

- **Support without Formal Complaint:** access to information, support and appropriate safety measures should not depend on making a formal complaint.

- **Intersectionality:** institutions recognise that factors including nationality, migration status, sexual orientation, gender identity, disability, age, ethnicity and economic situation may affect both exposure to violence and access to support.

- **Institutional Responsibility:** preventing and responding to violence is an institutional responsibility and should not be left only to individuals affected by it.

- **Fairness:** institutional procedures should protect victims/survivors while also respecting the rights of respondents and applicable principles of due process.

- **Evidence-Based Practice:** prevention, training, research and institutional responses should be informed by reliable research, professional standards and evaluated practice.

- **Confidentiality:** information about disclosures and cases should be shared only where necessary and in accordance with applicable law.
- **Accessibility:** information, reporting channels and support services should be easy to find, understand and use.
- **Continuous Improvement:** institutions should periodically assess whether their measures are effective and update them where needed.

Chapter II – Institutional Governance and Integrated Policies

Article 4 – Institutional Commitment and Leadership

Each signatory institution publicly supports the Code and identifies a person, team or office responsible for coordinating its implementation.

Responsibility should be linked to senior institutional leadership so that organisational changes, resources and decisions can be addressed effectively.

Institutions may use existing equality, safeguarding, student support, human resources or other structures where appropriate.

Article 5 – Gender Equality and Anti-Violence Policies

Signatory institutions include the prevention of and response to GBVAW and DV within their Gender Equality Plan, equality strategy, safeguarding framework, anti-harassment policy or equivalent institutional framework.

Institutions are not expected to create a separate policy where existing arrangements already meet the standards of this Code.

Article 6 – Internal Data Collection and Monitoring

Signatory institutions should collect and review anonymised information on disclosures, reports, institutional responses and outcomes where legally permitted.

The purpose of monitoring is to:

- identify patterns and gaps;
- improve support and prevention;
- assess accessibility and effectiveness;
- inform institutional planning.

Data should not identify individual victims/survivors or respondents in public reporting.

This institutional monitoring is separate from, but may inform, research under Article 11.

Article 7 – Resourcing

Signatory institutions identify the staff, expertise and resources needed to implement the Code.

Resources should be proportionate to the size and needs of the institution.

Institutions should aim for sustainable arrangements and avoid relying exclusively on short-term external projects.

Chapter III – Prevention, Education, Research and Third Mission

This Chapter supports the practical implementation of Articles 11 to 15 of the Istanbul Convention within academic settings.

Article 8 – Awareness-Raising

Signatory institutions regularly provide clear and accessible information on:

- GBVAW and DV;
- consent and respectful relationships;
- available support services;
- reporting options;
- emergency contacts;
- rights and institutional responsibilities.

Information should be visible and adapted to different groups within the academic community.

Article 9 – Education

Signatory institutions are encouraged to integrate education on GBVAW, DV, gender equality, the role of consent, respectful relationships and relevant professional responsibilities into teaching, induction or other educational activities where appropriate.

Content may be adapted to specific disciplines, professional programmes and student groups.

Article 10 – Training

Staff should receive appropriate and regular training on gender equality, consent, gender-based violence against women.

Training should include, where relevant:

- victim/survivor-centred approaches;
- trauma-informed practice;
- confidentiality and data protection;
- risk assessment;
- referral pathways;
- institutional procedures;
- relevant national law.

Basic awareness training should also be made available more widely to staff and students.

Article 11 – Data Collection and Research

Signatory institutions support high-quality research on GBVAW and DV, including violence, harassment and discrimination in academic environments.

Where appropriate, institutions should:

- support comparative and interdisciplinary research;
- share findings and methodologies;
- encourage ethical data collection;
- use research evidence to improve institutional practice.

Article 12 – Third Mission and Territorial Engagement

Signatory institutions develop links with relevant external actors, including:

- specialised anti-violence centres;

- civil society organisations;
- public authorities;
- health and social services;
- professional bodies;
- other educational institutions.

Universities are encouraged to use their education, research and public-engagement roles to contribute to prevention beyond the campus.

Chapter IV – Protection and Support

Article 13 – Accessible Reporting and Disclosure Routes

Each signatory institution provides at least one possible accessible way to:

- seek information;
- disclose an experience;
- request support;
- make a formal report.

At least one route should allow a person to contact the institution without going through their direct manager, supervisor, tutor or academic hierarchy.

Information should clearly explain:

- where to go;
- what happens after a disclosure;
- the difference between seeking support and making a formal complaint;
- what confidentiality can and cannot be guaranteed;
- what immediate safety measures may be available.

Article 14 – Risk Assessment and Immediate Safety Measures

When a disclosure indicates a possible safety risk, the institution should assess the situation promptly and discuss available protective measures with the person concerned.

Measures may include, where appropriate:

- changes to rooms or accommodation;
- schedule or teaching-group changes;
- changes to supervision arrangements;
- remote participation or temporary working adjustments;
- changes to access to buildings or spaces;
- restrictions on contact;
- referral to specialised external services.

Appropriate safety measures should, where legally possible, be available even when the victim/survivor does not wish to begin a formal disciplinary process.

Article 15 – Specialised Support

Signatory institutions should ensure access to appropriate specialised support for victims/survivors, either directly or through formal referral arrangements.

Support may include:

- psychological support;
- medical services;
- legal information or advice;
- social support;
- specialised anti-violence services.

Where feasible, institutions are encouraged to establish campus listening and support desks (*sportelli di ascolto*) in cooperation with specialised services.

Access to support should not depend on making a formal complaint.

Article 16 – Confidentiality, Consent and Data Protection

Information concerning disclosures and cases should be handled confidentially and in accordance with applicable data protection law.

People seeking support should be informed clearly about:

- how their information may be used;
- who may need access to it;
- the limits of confidentiality;
- circumstances in which information may need to be shared for legal or safety reasons.

Information should normally be shared with the victim/survivor's knowledge and consent.

Where information must be shared without consent because of a legal obligation or an immediate and serious safety risk, the person concerned should, wherever possible, be informed beforehand.

Article 17 – Non-Retaliation

1. Signatory institutions take steps to protect people who disclose violence, make a report, support another person or participate in a procedure from retaliation or disadvantage.

2. Retaliation may include academic, professional, contractual, financial, social or career-related disadvantage.

3. Allegations of retaliation should be addressed promptly under the institution's applicable procedures.

Chapter V – Institutional Procedures

Where institutions already have complaints, disciplinary, safeguarding or employment procedures, Articles 18 to 20 describe the basic standards those procedures should reflect.

This Code does not require the creation of a separate or parallel system.

Article 18 – Fair and Timely Procedures

Where a formal institutional process is required, it should be:

- fair;
- impartial;
- understandable;
- handled within clear and reasonably prompt timeframes.
- People conducting investigations or case assessments should have appropriate training.

Both the person making the report and the respondent should receive clear information about the procedure and its main stages.

Unnecessary repetition of a victim/survivor's account should be avoided.

Article 19 – Appropriate Outcomes and Measures

Where misconduct is established, institutions should apply measures or sanctions that are proportionate to the seriousness of the conduct and consistent with applicable law and institutional rules.

Informal resolution, mediation or restorative approaches should never be imposed on a victim/survivor.

They should not be used where there is a significant safety risk and should only be considered where they are lawful, appropriate and freely chosen.

Institutional responses may also include non-disciplinary measures aimed at prevention, education, organisational improvement or safety.

Article 20 – Rights of the Respondent

Institutional procedures should respect the rights of the respondent, including:

- the presumption of innocence;
- clear information about the allegation;
- a fair opportunity to respond;
- appropriate confidentiality;
- access to review or appeal where provided by applicable rules.

Respect for these rights is compatible with immediate safety and support measures for a victim/survivor.

Chapter VI – Cross-Border and Mobility Protocols

Article 21 – Continuity of Protection during Academic Mobility

Signatory institutions should seek to ensure continuity of support and protection when an incident arises during:

- Erasmus+ mobility;
- joint and double degree programmes;
- placements;
- study exchanges;
- research visits;
- staff mobility;
- other cross-border academic activities.

Institutions participating in the same alliance, consortium or academic network are encouraged to use the arrangements set out in Annex I(B).

The aim is to avoid requiring a victim/survivor to restart the entire process each time another institution becomes involved.

Differences in national law and institutional competence should be explained clearly to the person concerned.

Chapter VII – Governance, Adoption and Review

Article 22 – Coordination and Oversight

During the initial implementation phase, signatory institutions, alliances and networks may use the existing UN.I.RE./OCEAN coordination structure to:

- exchange practices and tools;
- support implementation;
- identify common challenges;
- monitor broad progress;
- facilitate cooperation across institutions.

The coordination process should include appropriate external expertise and representation of students and staff.

As participation grows, signatories may establish a dedicated coordination or oversight body.

Article 23 – Review, Learning and Reporting

1. Participating institutions should periodically review the implementation of the Code.
2. Review should focus not only on numbers of reports but also on:
 - accessibility of support;
 - effectiveness of prevention;
 - institutional response times;
 - training coverage;
 - feedback from students and staff;
 - areas requiring improvement.
2. The Code should be reviewed at least every three years, or earlier when developments in the Istanbul Convention framework, GREVIO findings, research or institutional practice make an update useful.
4. Academic networks, including UN.I.RE., may support institutions in exchanging good practice and contributing to relevant GREVIO consultations.

Article 24 – Relationship with National Law and Existing Policies

This Code is a practical common framework.

It does not replace national legislation, collective agreements or institutional rules.

Where national law, collective agreements or institutional policies provide stronger protection, those provisions apply.

Nothing in this Code limits the obligations of States under the Istanbul Convention.

Institutions may integrate the Code into existing frameworks rather than duplicate procedures or structures.

Article 25 – Adoption, Signature and Endorsement

1. The Code is open to formal adoption by:
 - universities;
 - other higher education institutions;
 - research institutions with relevant responsibilities;

- university alliances;
- university consortia.

2. A university or higher education institution may adopt the Code according to its internal rules.

3. A university alliance or consortium may adopt the Code through its governing or coordinating body or an authorised representative.

4. Individual member institutions of an alliance or consortium may also become signatories in their own right.

5. Academic networks, associations, faculties, schools, institutes and other bodies that support the principles of the Code but do not have authority to implement all its commitments may formally **endorse** the Code.

6. Endorsement expresses support for the principles and objectives of the Code but does not imply responsibility for institutional functions outside the organisation's competence.

7. A signatory institution commits to:

- assess its current arrangements against the Code;
- identify gaps;
- develop an implementation plan where needed;
- review progress periodically.

8. Institutions are not required to meet every standard on the date of signature.

Institutions still developing their systems may adopt the Code while setting out a reasonable transition plan.

9. The Code takes effect for each signatory from the date of its formal adoption and remains open to new signatories and endorsing organisations.

Annex I – Recommended Practices and Cross-Border Operational Protocol

This Annex contains practical recommendations that can strengthen implementation of the Code.

The practices in Section A are encouraged but are not minimum requirements for signature.

Section B provides a practical framework for cooperation during academic mobility.

A. Recommended Practices

- Join or create national and cross-border academic networks, based for example on the UN.I.RE. model, to exchange practices, training materials, research and institutional tools.
- Contribute, where appropriate, to GREVIO consultations, thematic evaluations and academic dialogue around implementation of the Istanbul Convention.
- Establish campus listening and support desks (*sportelli di ascolto*), where feasible, in cooperation with specialised anti-violence centres.
- Publish a simple online page bringing together support contacts, reporting channels, emergency information and institutional procedures.

- Include information on available support in student and staff induction.
- Include support and reporting information in mobility and international welcome materials.
- Provide accessible materials in relevant languages and formats.
- Regularly seek feedback from students and staff on whether reporting and support systems are visible, trusted and easy to use.
- Develop bystander-awareness and prevention initiatives.
- Create partnerships with specialised external organisations.

B. Cross-Border Operational Protocol

- **One Contact Point:** each participating institution publishes a focal point for mobility-related cases.
- **Continuity of Support:** when a person moves between partner institutions, institutions cooperate so that access to support does not stop because of the mobility period.
- **Recognition of Safety Measures:** where lawful and practicable, partner institutions should take account of safety measures already put in place by another institution.
- **No Need to Start Again:** institutions should avoid asking the victim/survivor to repeat their full account unnecessarily where information can lawfully and safely be transferred.
- **Minimum Necessary Information:** only information necessary to arrange support, protection or institutional coordination should be shared.
- **Consent and Transparency:** information should normally be shared with the victim/survivor's knowledge and consent.
- **Local Rules Apply:** the host institution explains clearly which measures it can put in place under national law and its own procedures.
- **Warm Referral:** wherever possible, the focal point in one institution should directly connect the person with the appropriate contact in the partner institution rather than simply providing contact details.

Annex II – Implementation and Self-Assessment Tool

This Annex is designed as a practical tool for implementation and continuous improvement. It is not a certification mechanism.

For each area, institutions may assess their current position using four stages:

- 1. Not started**
- 2. Developing**
- 3. In place**
- 4. Embedded and regularly reviewed**

A. Leadership and Governance

The institution has:

- a clear public commitment on GBVAW and DV;
- identified senior-level responsibility;
- a named coordinating office, service or person;

- integration of GBVAW and DV into relevant institutional policies.

B. Information and Accessibility

The institution provides:

- clear public information on GBVAW and DV;
- easily accessible support contacts;
- clear explanations of disclosure and complaint routes;
- information suitable for students, staff and international communities;
- accessible formats and languages where needed.

C. Reporting and Support

The institution has:

- more than one disclosure or reporting route;
- at least one route outside direct academic or managerial hierarchy;
- a clear distinction between support and formal complaint;
- access to specialised support;
- referral arrangements with external specialist services.

D. Safety and Risk Management

The institution has:

- a process for assessing immediate safety risks;
- access to appropriate temporary protective measures;
- procedures that do not require a formal complaint before support can be considered;
- mechanisms for responding to retaliation.

E. Institutional Procedures

The institution has:

- clear and published complaint or disciplinary procedures;
- reasonably prompt timeframes;
- trained personnel;
- appropriate confidentiality protections;
- review or appeal mechanisms where applicable;
- measures to avoid unnecessary repetition of a victim/survivor's account.

F. Prevention and Training

The institution provides:

- awareness activities;
- appropriate training for staff receiving disclosures;
- specialised training for staff conducting investigations or assessments;
- prevention initiatives for students and staff;
- educational activities where relevant.

G. Mobility and Cross-Border Cooperation

The institution has:

- a published mobility focal point;

- arrangements for coordinating with partner institutions;
- procedures for maintaining support during academic mobility;
- appropriate information-sharing arrangements.

H. Monitoring and Improvement

The institution:

- collects anonymised institutional data where legally permitted;
- reviews data and trends periodically;
- assesses whether support and reporting systems are working;
- seeks feedback from students and staff;
- identifies priorities for improvement;
- periodically reviews implementation of the Code.

Annex III – Institutional Implementation Record

Institutions may use the following simple format to document progress.

Area / Commitment

Current status: Not started / Developing / In place / Embedded

- *Existing measure or evidence:*
- *Gap identified:*
- *Action required:*
- *Responsible person or office:*
- *Target date:*
- *Progress update:*
- *Evidence or link:*

This record can be used internally, within university alliances or academic networks, and as a basis for periodic review and peer learning.