

Student Anti-Bullying and Harassment Policies at UK Universities

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This article provides the first analysis of all available UK university anti-bullying policies, summarising, comparing, and contrasting the content of policies acquired from university websites. The importance of anti-bullying policies is known from policy research in schools and workplaces but has previously not been investigated in Higher Education. A new coding framework and guidelines were developed to enable our analysis, and universities were given a score. Scores indicated variation between policies, suggesting some students may have inadequate support when consulting their university policy. The findings indicate that all universities should create and implement an anti-bullying policy. Students could be involved in the development of interventions or policies, as co-created initiatives may be more influential. University policy must be up-to-date, inclusive, comprehensive yet concise, and it must be publicised. We propose that our novel coding framework could be of use to policy makers and researchers investigating bullying policy within higher education.

Keywords: policy; bullying; harassment; higher education; students; university

There is no published research exploring anti-bullying policies at UK universities. The current study aimed to fill this gap by investigating the existence and quality of university policies. Due to the lack of available research in higher education, school and workplace anti-bullying policy research was consulted as a foundation. Schools were felt to be relevant as educational environments, whilst workplaces were considered a relevant context for adult bullying behaviours.

School Context

All UK state schools are legally compelled to have a behaviour policy containing a section on bullying prevention (Gov.UK, 2015). A mandatory policy may help to prevent, eliminate, and limit the negative effects of bullying, as suggested by the first UK Government anti-bullying pack for schools (Department for Education, 1994). This policy needs to be user-friendly for the whole school community, including parents, pupils and staff (Purdy & Smith, 2016).

An early synthesis revealed that schools with whole-school anti-bullying approaches that included a policy showed minimal reductions in self-reported victimisation (Smith, Schneider, Smith, & Ananiadou, 2004). Interpretation of the policy implementation in the 14 studies varied too much for tenable comparisons of effectiveness; the significant differences between studies could be assigned to methodological differences, such as randomly assigned groups or number of months to post-test follow-up (Smith et al., 2004). In contrast, a more recent review (Rigby & Smith, 2011) showed that self-reported victimisation declined from 1990 to 2009; the findings run parallel to implementations of anti-bullying programmes with policies, with the authors suggesting there is an association between anti-bullying policy and bullying reduction.

Research from the US shows similar mixed findings. Hall's (2017) systematic review of 21 school anti-bullying policy studies investigated the effectiveness of policies in reducing bullying. They reviewed the characteristics of each study and found that perceptions of policy effectiveness varied. Between 5 and 88 per cent of students, teachers, and school professionals thought policies were effective to some degree, whereas 4 to 79 per cent perceived policies as ineffective. Of the studies included in the review, three found a significant association and eight found no significant association between policy presence and lower recorded bullying rates. These findings give no clear indication of policy effectiveness, leading Hall to suggest that a policy is necessary but not sufficient. Policies must be implemented effectively, which was not the case in the schools involved in the review studies. Hall argued that policy content must be analysed to develop understanding of policy effectiveness and to ensure that policy is evidence-based. Policy content varies, with general components (e.g. bullying definitions and consequences) often included but other information omitted (e.g. signposting for mental health support). Finally, they contended that policies need to be jargon-free to facilitate implementation by educators.

Similar findings have been reported in the US. Hatzenbuehler, Schwab-Reese, Ranapurwala, Hertz, and Ramirez (2015) used data from 61,691 youths who were part of the Youth Risk Behaviour Surveillance Survey. Two questions were asked about bullying: during the past 12 months have you been bullied on school property, and; have you been electronically bullied? Prevalence rates varied from 14 per cent in Alabama to 27 per cent in South Dakota. States were assigned compliance scores based on the inclusion of 16 items in the policy recommended by the Department of Education. Increased compliance with three recommendations was associated with lower bullying rates: specifically, having a statement of scope; a description of prohibited behaviours; and requirements for districts to implement local policies. Although clearly defined prohibited behaviours were linked with lower bullying, the study did not establish which behaviours were responsible for this link. Hatzenbuehler et al. (2015) recommend that comprehensive policies include all four subtypes of prohibited school bullying (i.e. verbal, psychological/relational, physical, and cyber). The cross-sectional and correlational nature of the study prevents any conclusion regarding whether the policy alone led to decreased bullying or whether an interaction between policy presence, policy content, and school climate was responsible.

Content analysis of Canadian policies also provides mixed findings. Roberge (2011) obtained policies from two provinces (56 from Ontario and 8 from Saskatchewan), analysing them based on Smith, Smith, Osborn, and Samara's (2008) framework, but also including recommended governmental strategies for each province. Roberge looked at the number of schools that incorporated the framework criteria; if the content was found in 50 to 94 per cent of policies, the criterion was moderately satisfied; if content was found in less than 49 per cent of schools, it was marginally satisfied. Both provinces scored 'moderately' for almost all categories; however, mention of sexual orientation, gender, special needs, religious bullying and positive school climate were low in the Saskatchewan province (maybe related to the

relatively small sample). However, both regions scored low on sensitivity to diversity and reporting and responding to bullying, suggesting that improvements could be made in both provinces to incorporate vital criteria that would be protected by UK law (Protection from Harassment Act, 1997). This is especially important when considering evidence that shows inclusive school policies have been linked to fewer suicide attempts amongst lesbian, gay, and bisexual youth (Hatzenbuehler & Keyes, 2013).

Workplace Context

In contrast to schools, universities provide education for adult learners, which may mean that workplace bullying policies are salient.

Salin (2008) explored workplace policy content in detail, looking at organisational anti-bullying policies in Finnish municipalities. They surveyed 205 Human Resources managers asking about policy existence, whether bullying surveys had been conducted, and prevalence data. Copies of anti-bullying policies were also requested; 27 were obtained and analysed. Overall, 55 per cent of the organisations had a policy, but only 25 per cent of them recorded statistics. Definitions of bullying, victim and perpetrator recommendations, and clarifying what did not constitute bullying, were all prominent within the policies. Half of the policies noted disciplinary actions, but all instructed victims to confront their harasser and clarify their behaviour as offensive. Managers were responsible for gathering evidence from all parties, though clear reporting lines were not always outlined. Many policies used the same wording, suggestive of copy and pasting between organisations, rather than being content-driven from stakeholder and employee consultation, considered good practice in other contexts (e.g. Nelson, Lord, & Ochocka, 2001). Stakeholder engagement can ensure that policies include context-specific information (e.g. one institution many have sexual harassment problems and another poor management style).

In the US, Cowan (2011) gained a sample of 36 interviews from a HR management company, exploring whether companies used anti-bullying policies, communication about bullying, and interpretation of policies. Cowan found that only one person (less than 3 per cent) thought their organisation had an anti-bullying policy; 16 (44 per cent) said they had an anti-bullying policy that bore a general label (e.g. dignity and respect), and; 14 (39 per cent) claimed they had no organisational bullying policy. Cowan concluded that due to the lack of a policy, definition, or label of bullying in policies, a perception could develop that a company does not prioritise the prevention of workplace bullying. The non-labelled policies failed to include steps the victim could take when being bullied, repercussions, or addressing bullying. General policies in an organisation with a bullying culture appear to be unhelpful, whereas anti-bullying policies with clear guidelines may allow individuals more power to tackle situations.

Like schools, policies are not always effectively implemented. For example, 20,000 calls were made to ACAS (Advisory, Conciliation, and Arbitration Service, 2015) about bullying and harassment suggesting little success in the implementation of policies. ACAS suggest that skilled managers are needed to ensure that policy implementation is effective.

Moreover, there may be a lack of trust between bullying targets and the HR staff to whom they report incidents. Harrington, Rayner, and Warren (2012) used data from 17 interviewees (from a larger UK study) with Human Resources Practitioners (HRPs). All HRPs were responsible for dealing with bullying reports and seven had bullying-affiliated titles. All organisations in which they worked had anti-bullying policies. They were asked about what they considered as bullying, handling of cases, and to describe challenges; they reported that dealing with bullying was a challenging task involving balancing the needs of the employee, accused employee, and upper management. The HRPs voiced reluctance to raise allegations with their managers, and to validate the subjective experience of the bullied

person; they claimed to repackage bullying reports as variation in managerial style. If the person responsible for policy implementation denies the report, bullying can remain unresolved and the victim is left disenfranchised, with consequences for the whole organisation.

Ineffective implementation of policy may impact staff mental health and work efficiency due to lowered motivation, like school bullying impacting on whole school grades (Lacey & Cornell, 2013; Strøm, Thoresen, Wentzel-Larsen, & Dyb, 2013). Nevertheless, in their study of the UK National Health Service, Woodrow and Guest (2014) found reluctance amongst some management staff to implement anti-bullying policies or to use them effectively to resolve employee conflict, partly due to lack of motivation, and partly as a result of friendships with accused individuals.

Thus, policy can be seriously undermined without proper implementation. Managers must be trained and equipped to implement policy. However, many policies rely on the victim to resolve a bullying situation, which is problematic, not least for individuals with low self-esteem. Hence, the effective implementation of a quality anti-bullying policy, alongside a positive workplace culture, is necessary to deter bullying and incivility in the workplace (ACAS, 2015), and may also be required in universities.

University Context

Whilst universities share an educational purpose with schools, and are comprised of a community of adults, in common with workplaces, they are in many ways different from these contexts, and thus need to be independently researched. No academic research evaluating UK university anti-bullying policies has been published, hence the need for the current study. It is acknowledged that work has been done around sexual assault and harassment at UK universities and sometimes these policies overlap, but for the purpose of

this article, our focus is on bullying policies.

In Canada, Cismaru and Cismaru (2018) reviewed 39 institutional policies and reported that information across universities was highly variable, though sexual harassment, bullying effects, and the importance of a respectful environment were commonly included. Some policies used bullying and harassment interchangeably, whereas others included separate definitions. Most policies offered advice and available help, such as counselling and peer advisors, and they advised students not to ignore the bullying but to tell the harasser to stop. Policies frequently mentioned that everyone can act against bullying when it is witnessed. Despite the lack of systematic policy evaluation in this study, Cismaru and Cismaru (2018) recommended having consistent and easily accessible policies, alongside adequate information, investigations, and response times to ensure a respectful campus.

In the UK, the Alliance of Women in Academia (AWA, 2018) examined six policies (four from London, one from Manchester, and one from Oxford), investigating bullying and harassment, and reported their findings in a blog post. All institutions provided definitions of bullying and were publicly available, but they varied regarding reporting channels, signposting to other policies, and signposting to appropriate support mechanisms. The AWA (2018) stated:

The lack of adequate procedure and reporting mechanisms puts all the risk and cost of reporting onto the victims, further exposing them to retaliations in cases where the perpetrator is a member of staff or a colleague in a higher hierarchical position. Given the power relations at stake in academia, and the dependence of students and young scholars on their more established colleagues to succeed professionally, it is imperative that an external actor be in charge of listening to and supporting victims.

Similarly, the policies were not clear on the consequences of bullying, with no established scales of punishments and little protection for the victim. The Alliance recommends institutions should have a dedicated bullying and harassment webpage, establish clear reporting procedures with trained independent staff, have confidential reporting channels, investigate reports, keep records of allegations, and introduce continuous mandatory training for all staff and students. In conclusion, the AWA proposes three main criteria for efficacious anti-bullying policies: (1) a policy must exist and be of good quality; (2) there must be adequate reporting channels, and; (3) the policy must be effective with consequences.

It has been argued that there are strong overlaps between university anti-bullying policies and workplace bullying policies (Salin, 2008). Some universities even have the same policy for students and staff, despite potential differences between how they might experience bullying. Students and staff typically vary in age and power (Hulme & Winstone, 2017). Bullying amongst staff may need to be addressed in a manner that considers formal hierarchies due to seniority of role. In contrast, students may create informal hierarchies, but these are often hidden from outsiders; thus, student policies may need to adopt a more nuanced approach to cover informal power differences between students who bully and their victims.

One way to address this could be through working with students as change agents around university policy (Carey, 2018; Cook-Sather, Matthews, Ntem & Leathwick, 2018). Engaging students in policy development enables the policy to be tailored to the specific university context.

Universities have a Public Sector Equality Duty and a duty of care to their students, similar to workplaces. Yet, workplace and student populations are different. Most students can be classed as emerging adults and are still maturing (Arnett, 2015), and the university is a

learning environment, unlike most workplaces. As such, policies must not be entirely modelled on workplaces, but the lack of previous research on university bullying makes it difficult to make recommendations around best practice in policy development. The current study aims to address this gap, using a content analysis (as recommended by Hall, 2017) of anti-bullying policies in UK universities.

Aims

- (1) To obtain and analyse UK university anti-bullying and harassment policies.
- (2) To develop and evaluate a novel policy coding framework, focusing explicitly on anti-bullying and harassment policy in university contexts.
- (3) To identify their content, level of detail, and prioritised sections.
- (4) To compare policies' content.

Method

Participants

In 2016/17, the Good University Guide website listed 144 universities, including small specialist institutions. From 2016 to 2017, policies were downloaded from university websites or requested via a Freedom of Information Act (FOI) request. Fifty-three were publicly available and six were obtained through FOI requests. A further search in 2019 found three additional policies, totalling 62.

Materials and procedure

Coding framework and guidelines development

A draft codebook and guidelines were compiled by consulting Smith and colleagues' (2008) school framework. Most items were suitable for the university context, though some

wording was altered (e.g. lecturer replaced teacher). Twenty-six items formed the initial framework and five items were excluded. The ACAS webpages were consulted for relevant information relating to workplace bullying and harassment, and a small sample of university policies (the first six based on alphabetical listing) were reviewed. Forty-nine items were added, resulting in a 75-item codebook. This was discussed between the authors several times; finally, three items were removed, and other items reworded. The content of policies was recorded using the *yes* or *no* presence or absence of items. Total points were calculated resulting in an overall score for each university policy analysed. The initial coding framework was revised using inter-coder agreement results from three coders with several rounds of coding using a small selection of policies. Discrepancies in coding were assigned to some items being missed, whereas other items were interpreted manifestly instead of latently. Discussion revealed differences in interpretation based on bullying-specific interpretation. The items and guidelines were made more explicit. It was decided that for the final coding, the reliability check should be conducted by the coder with expertise on bullying. It is acknowledged that some familiarity with bullying may be required to use the framework in future. The final version of the framework had 64 items divided into four sections (Table 1). Coder one coded all 62 policies and coder two coded 25 per cent (Wimmer & Dominick, 2013, p.175) of the policies (16) for reliability. Cohen's Kappa, a statistic used to measure inter-coder reliability for categorical items, was calculated and agreement scores are in Table 2. Scores ranged from .40 (weak agreement) up to .90 (strong agreement), with a moderate average of .63 (McHugh, 2012).

Insert Table 1 here

Insert Table 2 here

Results

An initial investigation compared universities that did and did not have policies. Using three clusters created by categorising universities based on publicly available characteristics, such as research activity, teaching quality, and socioeconomic student mix (Boliver, 2015), a chi-square test of independence was performed. The relationship between whether the university was (1) research-intensive, (2) research and teaching, or (3) teaching-intensive, and existence of policy was not significant, $\chi^2(2, N = 122) = 1.10, p = .58$. This suggested that having an anti-bullying policy was independent of university type (Table 3).

Insert Table 3 here

Overall policy and subsection scores

Table 1 displays scores for the 62 universities. No item was included in every policy. On average, each university included 66.28 per cent of all codebook items. Items from Subsection (A), dedicated to the nature and definitions of bullying and harassment, were most frequently included, with universities including 73.75 per cent of these items. For Subsection (C), recording bullying and evaluating policy/procedure, universities included 67.70 per cent of items. Subsection (D), relating to aims, values, and strategies for preventing bullying was the next most frequently included, at 57.45 per cent, followed by Subsection (B), on initial reporting and responding to bullying, with 57.30 per cent inclusion.

Items present in most policies referenced a power imbalance and methods of bullying commonly seen in schools (e.g. physical, verbal, relational, and cyber). Policies often included protected characteristics such as homophobic, racist, disablist, and sexual harassment; most policies had 'harassment' in the title, encompassing unlawful behaviour alongside bullying. Most policies also provided support mechanisms for students who were bullied, such as counselling services and links to other policies and procedures. However,

most policies initially instructed students to informally resolve any grievances by addressing the perpetrator and making them aware of their offensive behaviour. Other items scoring highly were how policy is implemented and who it applies to, indicating job role expectations and responsibilities.

In general, policies scored poorly on mention of material bullying, that is, bullying associated with damaging or stealing others' property or possessions. Reference to 'being under the influence' of alcohol or drugs not excusing bad behaviour was also rare. Lastly, a small number of policies included a flow chart of events; flow charts are often used in documentation to aid understanding of processes.

Discussion

This study builds upon the small-scale research by the AWA (2018) and is the first to explore the presence and content of UK university anti-bullying policies. It is important to examine this to determine the effectiveness of policy in reducing bullying behaviour. We investigated how many universities had policies and explored their content using a new coding framework based on school policies, guidelines from ACAS, and a subsample of higher education policies; policies were then compared on content to inform recommendations for future policies.

First, there was no difference between university clusters and the existence of a policy, suggesting that policy existence does not vary according to university emphasis on teaching and/or research. It is not mandatory by law for universities to have policies in place in the UK (though it is in other jurisdictions, e.g. in the US cyberbullying is illegal), unlike schools; however, they are bound by a duty of care and are required to uphold the Protection from Harassment Act (1997). It is surprising that some universities have decided not to create a policy, or are slow in delivering planned policies, considering the pertinence of bullying

and harassment in academia (Batty, 2019; Batty, Weale, & Bannock, 2017). However, it is acknowledged that some universities may have decided to incorporate information about bullying into a variety of policies rather than having a specific anti-bullying policy.

An increase in mental health problems amongst university students has also been reported (e.g. Brown, 2016); bullying may be contributing to this. Based on the school (Lacey & Cornell, 2013; Strøm et al., 2013) and workplace bullying literature (Woodrow & Guest, 2014), a climate of harassment could negatively affect the whole student population. Consequently, it is recommended that all universities develop and implement a current and up-to-date bullying policy that is available to all students. A bullying-specific policy implies an openness surrounding bullying and harassment that may encourage students to talk about their issues and seek help and may deter perpetrators because the consequences are clear.

The universities with policies included on average 66.28 per cent of items in the code framework. The most frequently included items related to Subsection (A), which contained items regarding definitions and the nature of bullying. Whilst government does not currently provide guidance on bullying in higher education, relevant information and definitions are available from the school and workplace bullying literature, and these are essential to inform decisions about whether bullying has occurred on the part of both victims (Vaill, Campbell, & Whiteford, 2020) and those responsible for dealing with bullying. Having a specific anti-bullying policy may allow any bullying to be identified and tackled effectively without students or staff struggling to find the relevant information within other named policies. Bullying is a problem that can often be difficult to recognise, and so it is argued that a separate and clearly defined policy is needed in the higher education context where ambiguity regarding the term may be particularly prevalent. A separate policy may contribute to ensuring consistency in the application of authorised norms and values across higher education students (Rizvi & Lingard, 2010). It is important to recognise that policies can

serve different purposes. Also, our research suggests that more focus could be given to higher education-specific bullying behaviours, such as material bullying (e.g. destroying or hiding possessions) and humiliation (such as belittling someone in class, making derogatory jokes, or insulting their appearance; Harrison, Hulme, & Fox, under review). Inclusion of clear policy definitions may also help victims to regulate negative affect caused by bullying – naming emotions and feelings can attenuate affective responses (Creswell, Way, Eisenberger, & Lieberman, 2007; Lieberman, Inagaki, Tabibnia, & Crockett, 2011).

A power imbalance is included in most bullying definitions and is a clear component in bullying identified within the childhood and higher education literature (Smith, 2004; Volk, Dane, & Marini, 2014). Students may be unfamiliar with university bullying and may find it difficult to recognise their power disadvantage, so it is recommended that explicit contextual examples should be given to make relational power differences more recognisable.

Around half of the items in Subsections B (initial reporting and responding to bullying; the third most frequently cited group of items) and D (aims, values, and strategies for preventing bullying; the fourth), were included (see Table 1). The scarcity of research on bullying within higher education means there are no available evidence-based guidelines on responding to bullying reports, and most policies do not instruct individuals on how to respond to bullying or include sanctions or help for perpetrators. Responding to bullying and not being a bystander is known to be an important factor in bullying prevention in schools (Salmivalli, 2010) and workplaces (Branch, Ramsay, & Barker, 2013); yet, organisations, as well as individuals, can maintain the bullying if they are perceived to minimise bullying claims during investigations (Harrington et al., 2012). This is evident in universities when they appraise bullying as pranks and fail to take them seriously (Myers & Cowie, 2016).

Within the policies we analysed, there was minimal inclusion of opportunities to appeal an outcome or of suggestions for resolutions between aggrieved parties. This may

reflect inexperience of universities in dealing with bullying reports as well as the lack of research. A clear set of guidelines must be evident, from the reporting stage through to resolution or sanctions, to facilitate accountability. Policies may wish to indicate that formal complaints will invoke discomfort in all parties but that institutions will do everything to help victims.

Most policies included what the victim could do, giving them a way of helping themselves or resolving the situation; however, the rest of the section on reporting and responding scored poorly. There was little information on how onlookers could respond, of resolutions for the complainant and accused, nor were there suggestions for perpetrator behaviour change. Roberge (2011) reported similar findings when investigating school policies. These points have been given little consideration in policies, perhaps because formal complaints are rarely made. The first steps seem positive, but there is a lack of information about what happens afterwards. Like the HR research showing that managers repackage bullying claims, it is apparent that universities are not adequately outlining how they will respond to bullying. Students may become aware that bullying goes unresolved at their university, and so trust between staff and students may be impacted. There should be enough information in policies to help staff and students recognise the process of a complaint. Designated staff members should have sufficient training on bullying to acknowledge victims' perspectives and feel confident enough to respond to a report.

Most policies included resolving the bullying informally first, in the form of the victim addressing the perpetrator and asking them to stop. This may be appraised as empowering; nevertheless, directly confronting a perpetrator places the target in an imbalanced relational dynamic. In another study (Harrison, in prep), students were asked how easy they would find it to informally confront their perpetrator on a scale of zero to ten, where zero was *very easy* and ten, *not at all easy*. The mean score was 5.94 (SD = 2.96, $N =$

437), with 60 per cent (297 students) giving a score of five or above, showing that most students would not be able to do this. This informal resolution is also seen in workplace policies, but its effectiveness may be limited. The last item included in most policies was whose responsibility it was to do what. It is useful to know who to approach in the first instance, but if the response is lacking after approaching this person it negates the usefulness of listing them and reiterates the need for comprehensive practical procedures and adequate staff training.

Another item omitted from policies was that being under the influence of alcohol or drugs does not excuse unacceptable behaviour. Binge drinking culture is a problem amongst students and this leads to careless behaviour such as arguing, fighting, and damaging property (Vik, Carello, Tate, & Field, 2000); it has also been linked to increased sexual (Norona, Borsari, Oesterle, & Orchowski, 2018) and verbal aggression (Carlson, Johnson, & Jacobs, 2010). With increased risk of bullying and harassment when intoxicated, it is recommended that regardless of 'being under the influence', individuals are still responsible for their actions.

A final item scoring poorly was the existence of procedural flow charts. A simple flow chart may be easier to understand and enable important information to be located quickly and easily by a distressed student. Most policies are substantive documents (mean = 9.40 pages, ranging from 2-26, SD = 5.66). Students have grown up with social media and small chunks of information and may prefer concise presentation of information. Harrison (in prep) found that only 16.10 per cent of students (71) who were aware of their anti-bullying policy reported reading it. We recommend that accessible ways of presenting policy information be sought.

Accordingly, universities ought to all have a policy that is accessible, available, and displayed on communication channels. This could be a video on the university intranet or

represented graphically and added to mandatory online induction modules. Collaborative student focus/working groups could explore what should be included in policies so students will want to read and follow them (Vaill et al., 2020); including key stakeholders in decisions allows for them to have increased power and motivation (Nelson et al., 2001). The inception of the term ‘students as partners’ aims for students to work alongside staff and researchers by rejecting traditional hierarchies (Cook-Sather et al., 2018). This offers students agency, increasing the likelihood of them stressing the importance of kindness and respect within the university community.

Limitations

After several iterations, some reliability statistics for the coding framework were still below the desired cut-off point, indicating more work is needed on the framework or guidelines, or more training needed for the coders. With adjustments of all three, reliability is likely to increase. Someone with specialist bullying knowledge may be best placed to review future policies as they could be sensitive to pertinent issues in the field.

Secondly, only policies entitled ‘bullying and/or harassment’ were included in the analysis. Other types of policies were found in the initial search, though they were titled differently and may have been more general (e.g. dignity and respect, code of practice). These policies could have included some information on bullying and harassment, which may have been missed. To aid students in finding information, we recommend that universities separate bullying and harassment information from general policies and create specific bullying and harassment policies or change titles to better reflect their content. Future research may wish to include all other types of policies in their analyses if they include information on bullying; this may give a broader picture of the information already in circulation and address the discussion about which method of providing the information is

most effective: having a specific anti-bullying policy or including the information across various other policies (e.g. harassment, complaints, disciplinary procedures).

Finally, within this study, we have largely concentrated on anti-bullying policy with a focus on dealing with incidences of bullying. Strategies for prevention are also underdeveloped as higher education bullying research is in its infancy, but a theoretically informed preventative intervention could tackle bullying before students need to use a policy. It may be that the existence of a policy itself can work as a deterrent (Vaill et al., 2020). Without awareness of the underlying mechanisms of student bullying, strategies that are not evidence-based may not elicit change. Students should be involved in intervention design and research findings could inform the foundations of such a working group. A whole-university approach is desirable to achieve this; a positive university climate may empower students and help to avoid victimisation happening in the first place.

Conclusion

We have presented a new and comprehensive framework for coding university anti-bullying policies. This will be useful for future research to explore the role of policies in bullying in the higher education context. This article provides the first analysis of all available UK university anti-bullying policies, covering their content, how instructive and informative they are, and how certain criteria are prioritised. Through the development of guidelines and a framework, content was compared, showing variation between institutions, which concurs with an Australian content analysis of university anti-bullying policies (Vaill et al., 2020). Students at some universities may not have adequate support when seeking bullying information. Alongside policy discrepancies, the preferred informal method of addressing a perpetrator is problematic. More plausible methods for students to address bullying should be sought, and students should be involved in the development of interventions; if co-created,

they may have more influence. Universities with no policy may be failing their students.

Workplaces and schools have policies; likewise, universities (which are workplaces *and* educational institutions) should have a policy to protect their population.

Not only should the policy exist, but it should also be implemented. Organisations can either allow or disallow bullying depending on proper implementation of the procedure. It should act as a deterrent as well as guiding acceptable behaviour. Once all universities have policies in place, a large-scale study could investigate associations between policies and bullying rates at the universities. This would clarify the usefulness of policies and go some way to addressing the role of organisational policy-level factors in maintaining bullying behaviour at university. It would also highlight whether having a policy contributes to the systemic response of the university in challenging and addressing a disrespectful bullying culture on campus.

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Table 1

Number and percentage of policies that have included items from the codebook

Item (A) Definitions/Nature	No	Yes
1. Does the policy include reference to 'misuse/abuse of power'?	8 (12.9%)	54 (87.1%)
2. Does the policy include reference to bullying involving repetition or potential to be repeated?	19 (30.6%)	43 (69.4%)
3. Does the policy make it clear that bullying is different from other kinds of aggressive behaviour?	31 (50%)	31 (50%)
4. Is it clear that academic debate/feedback is not bullying?	34 (54.8%)	28 (45.2%)
5. Mention physical/actions or threats of physical acts?	3 (4.8%)	59 (95.2%)
6. Mentions verbal?	3 (4.8%)	59 (95.2%)
7. Mentions relational/social/indirect?	4 (6.5%)	58 (93.5%)
8. Mentions cyber?	1 (1.6%)	61 (98.1%)
9. Mentions material (e.g. damaging property)?	55 (88.7%)	7 (11.3%)
10. Mentions homophobic?	1 (1.6%)	61 (98.4%)
11. Mentions racial bullying?	2 (3.2%)	60 (96.8%)
12. Mentions sexual bullying?	3 (4.8%)	59 (95.2%)
13. Mentions disablist bullying?	3 (4.8%)	59 (95.2%)
14. Mention the issue of student-lecturer and/or lecturer-student bullying?	21 (33.9%)	41 (66.1%)
15. Give specific/detailed examples of bullying?	8 (12.9%)	54 (87.1%)
16. Mention definition of harassment?	1 (1.6%)	61 (98.4%)
17. Give examples of harassment?	5 (8.1%)	57 (91.9%)
18. Mention harassment is/may be against the law?	10 (16.1%)	52 (83.9%)
19. Mention the protected characteristics (all or some)?	2 (3.2%)	60 (96.8%)
20. Mention a definition of discrimination and/or include the different types?	35 (56.5%)	27 (43.5%)
21. Mention the Equality Act (2010)?	23 (37.1%)	39 (62.9%)
22. Mention a definition of victimisation (regarding a complainant who has reported someone for abuse based on protected characteristics)?	18 (29%)	44 (71%)
23. Mention individual differences, or being mindful and respecting perceptions/cultures?	28 (45.2%)	34 (54.8%)
24. Mention how being bullied can make you feel?	16 (25.8%)	46 (74.2%)
25. Mention how bullying can affect academic work and learning?	21 (33.9%)	41 (66.1%)
26. Mention the legal concept of reasonableness?	21 (33.9%)	41 (66.1%)

27. Mention that the policy applies even if the behaviour was not intended to hurt?	18 (29%)	44 (71%)
28. Mention that 'being under the influence' does not excuse inappropriate behaviour?	51 (82.3%)	11 (17.7%)
Total subsection scores	445 (26.25%)	1250 (73.75%)
(B) Initial Reporting and responding to bullying incidents/responsibilities		
29. Provide information for what the victim could do?	3 (4.8%)	59 (95.2%)
30. Provide information about how employees could respond to a report of bullying?	24 (38.7%)	38 (61.3%)
31. Provide information on actions that other students could take if they know of bullying?	36 (58.1%)	26 (41.9%)
32. State what sanctions there are for bullying behaviour (e.g. if it's a criminal act, may be prosecuted)?	20 (32.3%)	42 (67.7%)
33. State whether sanctions applied for bullying will depend on the type or severity of the incident?	31 (50%)	31 (50%)
34. Mention support mechanisms for the victim?	6 (9.7%)	56 (90.3%)
35. Mention resolution mechanisms for either complainant and/or accused (e.g. mediation and/or counselling)?	25 (40.3%)	37 (59.7%)
36. Suggest how to help the student doing the bullying to change their behaviour?	47 (75.8%)	15 (24.2%)
37. Mention the opportunity to appeal if unsatisfied with formal outcome/review?	44 (66.1%)	15 (24.2%)
38. Include a clear flow chart of what to do in a bullying situation?	50 (80.6%)	12 (19.4%)
39. Link/signpost to other related documents, policies, and procedures (e.g. regulations, code of conduct)?	4 (6.5%)	58 (93.5%)
Total subsection scores	290 (42.70%)	389 (57.30%)
(C) Recording bullying, communicating, and evaluating policy/procedure to follow		
40. Mention that student/staff should record evidence, where practical, of bullying/harassment incidences?	27 (43.5)	35 (56.5%)
41. Mention that the report of bullying will be recorded?	21 (33.9%)	44 (66.1%)
42. Mention explicitly and transparently how this information will be used?	25 (40.3%)	37 (59.7%)
43. Mention periodic review and updating policy?	30 (48.4%)	32 (51.6%)
44. Mention all reports of bullying will be taken seriously?	18 (29%)	44 (71%)

45. Mention fake complaints/reports could lead to disciplinary action?	17 (27.4%)	45 (72.6%)
46. Mention that informal resolution should come first?	8 (12.9%)	54 (87.1%)
47. Mention formal resolution second?	9 (14.5%)	53 (85.5%)
48. Mention how a formal complainant will be supported?	34 (54.8%)	28 (45.2%)
49. Mention what happens if a complaint is made against you?	45 (72.6%)	17 (27.4%)
50. Mention how the policy is put into practice (i.e. whose responsibility it is to do what)?	5 (8.1%)	57 (91.9%)
51. Mention confidentiality will be maintained where possible?	7 (11.3%)	55 (88.7%)
Total subsection scores		246 (32.93%) 501 (67.07%)
(D) Aims and Values/Strategies for preventing bullying		
52. Mention general issues of peer support?	36 (58.1%)	26 (41.9%)
53. Mention the preventative role of campaigns/training?	44 (71%)	18 (29%)
54. Mention issues of inclusiveness?	45 (72.6%)	17 (27.4%)
55. Mention the existence of a dignity advisor/bullying ambassador or equivalent	36 (58.1%)	26 (41.9%)
56. Mention staff and/or student's responsibility for treating people acceptably/with respect (e.g. good behaviour, creating a safe environment)?	16 (25.8%)	46 (74.2%)
57. Mention the aim or purpose of the policy?	15 (24.2%)	47 (75.8%)
58. Mention who the policy applies to?	3 (4.8%)	59 (95.2%)
59. Mention the importance of dignity &/or respect?	6 (9.7%)	56(90.3%)
60. Mention equality and/or diversity?	19 (30.6%)	43 (69.4%)
61. Mention feeling safe/supported/belonging?	41 (66.1%)	21 (33.9%)
62. Mention it is staff and/or student's responsibility to address unacceptable behaviour?	24 (28.7%)	38 (61.3%)
63. Mention the phrase 'duty of care' and/or other legal responsibilities of university?	28 (45.2%)	34 (54.8%)
64. Mention where the policy applies (e.g. just on campus, or field trips)?	30 (48.4%)	32 (51.6%)
Total subsection scores		343 (42.55%) 463 (57.45%)
Total scores overall		1324 (33.72%) 2603 (66.28%)

Table 2

Levels of agreement between two coders for subsample of policies

University policy	Cohen's Kappa score between coders
1	.37
2	.44

3	.47
4	.48
5	.53
6	.60
7	.61
8	.67
9	.68
10	.68
11	.69
12	.69
13	.76
14	.78
15	.82
16	.84

Table 3

Frequency and percentage of universities with a bullying policy in each cluster

University cluster	Frequency	Percentage
Research	42	34.4
Research and teaching	64	52.50
Teaching	16	13.10
Total	122	100.00