



Harmful Practices Response Index

*How UK Higher Education Institutions Respond to
Harmful Practices: Honour-Based Abuse, Forced Marriage and Female
Genital Mutilation*

125

Institutions analysed

10

Regions covered

7

Dimensions of analysis

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Foreword

This report represents a first of its kind: a systematic, evidence-based assessment of how higher education institutions across the United Kingdom currently respond to harmful practices, specifically honour-based abuse (HBA), forced marriage (FM) and female genital mutilation (FGM). These three terms are used consistently throughout this report. Where the collective term ‘harmful practices’ is used, it encompasses all three.

Between July and September 2025, Recultured submitted identical Freedom of Information (FOI) requests to universities across England, Scotland, Wales and Northern Ireland. One hundred and twenty-five institutions provided substantive responses, spanning seven dimensions of safeguarding policy and practice. The resulting dataset offers an unprecedented view of how the sector is positioned to identify, respond to and support those affected by these issues.

The findings presented here are sobering. Whilst examples of good and developing practice exist, the data reveals entrenched and systemic gaps, most notably in specific policy provision, specialist staff training, data recording and the recognition of staff as potential victims and survivors. The introduction of a statutory definition of HBA through the *Crime and Policing Act 2026*, accompanied by a power to issue statutory guidance directed at public authorities with safeguarding functions including education, represents a significant shift in the normative landscape within which higher education institutions operate. Whilst universities in England are regulated principally by the Office for Students rather than being direct subjects of this guidance, and whilst the guidance itself is non-binding in a strict legal sense, institutions will increasingly be expected to demonstrate awareness of and alignment with the standards it articulates. The findings of this Index suggest the sector is poorly positioned to do so.

All institutional data is presented anonymously. The purpose of this Index is not to expose individual universities, but to illuminate sector-wide patterns and to drive meaningful, evidence-informed improvement.

Ameera Jamil and Fedra Mardani

Co-founders, *Recultured*

Executive Summary

Recultured submitted standardised FOI requests to higher education institutions across the UK, seeking information on how each institution records, responds to and supports individuals affected by harmful practices, specifically HBA, FM and FGM. One hundred and twenty-five institutions provided responses, which were assessed across seven dimensions of safeguarding practice.

The most significant finding is structural: no institution in this dataset held a specific, standalone policy on HBA, FM or FGM. Whilst 38% of institutions named at least one of these harmful practices within the body of their policy responses, all did so within broader domestic abuse, safeguarding or gender-based violence frameworks rather than through dedicated provision. Only 15% had delivered any form of specialist training on these practices, and just 10% reported any mandatory training requirement. Critically, whilst the FOI request explicitly asked about staff as victims and survivors, only a small number of institutions provided evidence of genuine, structured provision for staff in this capacity.

Against a backdrop of nearly 3,000 HBA-related offences recorded by police in England and Wales in the year ending March 2025, a figure widely acknowledged to represent a significant undercount, this report makes clear that higher education has substantial ground to cover.

<p>38%</p> <p>Named harmful practices in policy responses</p>	<p>15%</p> <p>Had specialist HBA/FM/FGM training</p>	<p>~4%</p> <p>Genuine provision for staff as victims</p>	<p>26%</p> <p>Could not retrieve their own data</p>
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Aims and Methodology

Aims

This Index was designed to produce clear, reliable and sector-facing insights into:

- how universities record, respond to and support disclosures of harmful practices, specifically HBA, FM and FGM;
- gaps in policy, training and awareness provision across the sector;
- inconsistencies in approach within and between institutions;
- opportunities for improvement at both institutional and sector level.

Freedom of Information process

Between July and September 2025, Recultured submitted standardised FOI requests to universities and colleges in all four nations of the United Kingdom. Requests were directed to institutional FOI officers and covered seven domains of safeguarding practice: disclosure recording; volume of disclosures by academic year from 2019–20 to 2023–24; risk assessment processes; staff training; awareness-raising activities; support provision for affected students and staff; and the availability of relevant policies and procedures.

125 institutions provided substantive responses. One institution transmitted their response via a secure server but was unable to resend in time for inclusion in this dataset. Another (one) institution published their response through their public FOI disclosure log and was included on that basis. Two institutions submitted a joint response, which has been analysed as two separate institutional records given their distinct legal status.

Scoring and analysis framework

Each response was assessed across seven dimensions: disclosure recording; volume data provision; risk assessment processes; staff training; awareness-raising activities; support provision; and policy coverage. Analysis was conducted through structured reading of each institutional response. Conservative interpretations were applied in ambiguous cases. The purpose of this framework is to identify patterns and gaps across the sector rather than to rank or evaluate individual institutions, which is why all findings are presented anonymously.

It should be noted that FOI responses reflect what institutions were able or willing to report, not necessarily the totality of their practice. Some institutions may have provision that was not captured in their response. This analysis should therefore be read as a conservative baseline assessment rather than a definitive audit.

The standardised FOI request submitted to all institutions is reproduced in full at Appendix A.

Key Findings

1 Disclosure Recording

Institutions were asked whether they formally record disclosures of HBA, FM and FGM, and whether these are recorded using specific categories or flags. The findings reveal a fundamental structural problem that undermines every other dimension of institutional response.

91% of institutions have no specific recording categories for HBA, forced marriage or FGM.

The overwhelming majority group these disclosures under generic domestic abuse, safeguarding or 'other' categories, rendering them invisible within institutional data systems.

Whilst approximately 85% of institutions report using some form of centralised reporting system, the critical limitation lies in how disclosures of harmful practices are categorised within those systems. In the vast majority of cases, disclosures of HBA, FM and FGM are absorbed into broader domestic abuse or generic categories, with no specific flag, field or category for these practices. This means that even institutions actively recording such disclosures cannot subsequently identify, count or analyse them as a distinct phenomenon.

A number of institutions acknowledged this limitation and indicated they were exploring the addition of specific categories to their reporting tools. This is a constructive development; however, the scale of the gap means the sector currently lacks any meaningful dataset on the true prevalence of disclosures related to harmful practices within higher education.

A further significant concern is the data retrieval problem: 26% of institutions (32 out of 125) invoked Section 12 of the Freedom of Information Act, the cost-limit exemption, when responding to the volume data element of this request. This indicates that one in four universities cannot retrieve their own disclosure data without undertaking a manual review of hundreds of case files across multiple disconnected systems. An institution that cannot retrieve its own data cannot use it to identify trends, make the case for resources or demonstrate improvement over time. Data fragmentation of this kind is not an administrative inconvenience; it is a safeguarding failure.

“

These are classed under domestic abuse within the reporting tool. More specific details of the nature of such disclosures are recorded by colleagues via our case management process.

— Midlands institution

“

HBA and FGM would sit within the domestic abuse category. We do not have flags.

— South East institution

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Such instances are not recorded centrally; therefore, the only way to provide this information would be to manually go into all student welfare case files. This would take in excess of the 18-hour limit under Section 12(1) of the Freedom of Information Act.

— Midlands institution, Section 12 refusal

2

Volume of Disclosures and National Context

Of the 93 institutions able to provide some form of volume data, 56 reported at least one disclosure of harmful practices across the five-year period from 2019–20 to 2023–24. Nine institutions explicitly reported zero disclosures across all five years. A further 32 were unable to provide data, citing Section 12 cost limits.

~3,000

HBA-related offences recorded by police in England and Wales (year ending March 2025)

Home Office statistics. Government officials note that this figure is likely a substantial undercount given the hidden nature of these forms of abuse.

The contrast between the volume figures reported by institutions and the national picture is striking. In 2025, nearly 3,000 HBA-related offences were recorded by police in England and Wales, and the Forced Marriage Unit handled around 1,295 referrals. These figures are themselves considered significant undercounts. Yet the aggregate of disclosures reported across 125 higher education institutions over five years remains comparatively negligible. This disparity does not indicate the absence of harmful practices on campuses. It indicates the absence of routes through which those experiencing such practices feel equipped, safe or sufficiently informed to disclose.

When victims and survivors do not come forward, it is rarely because they have nothing to disclose. Research consistently demonstrates that barriers to disclosure include fear of disbelief, lack of awareness of available support, cultural and community pressures, and the absence of visible, named institutional pathways.

2

3

Response Processes and Risk Assessment

Institutions were asked whether a formal internal process exists for managing disclosures of harmful practices and whether a named risk assessment tool is used in this context. Whilst approximately 90 per cent of institutions reported some form of process, the quality and appropriateness of those processes warrant close examination.



Whilst DASH explicitly encompasses honour-based abuse alongside domestic abuse and stalking, its evidence base is derived predominantly from domestic abuse research, and its risk threshold mechanisms are calibrated primarily around intimate partner dynamics. This creates significant limitations in harmful practices contexts: the tool does not adequately account for the multi-perpetrator family and community structures that characterise HBA, the collective coercive dynamics associated with FM, or the specific safeguarding considerations relevant to FGM. The widespread use of DASH as the default and often sole risk tool, without specialist supplementation or adaptation, therefore risks generating incomplete risk assessments in precisely the cases where accurate assessment is most consequential.

A small number of institutions demonstrated more sophisticated approaches, including the use of tools specifically adapted for harmful practices contexts and the development of multi-agency referral processes. Scottish institutions were particularly notable in this regard, with several referencing the EmilyTest programme, which provides structured support for staff receiving disclosures of gender-based violence. Whilst the EmilyTest framework is primarily oriented towards disclosure receipt and staff support rather than risk quantification, it represents a constructive model of sector-specific infrastructure and indicates what is achievable when national strategic frameworks are in place.

“

There is no formal internal process or procedure in place for managing disclosures of forced marriage, honour-based abuse or FGM. Support would be provided where appropriate, including counselling, referral to external services and possible police involvement.

— London institution

“

We use a general risk matrix alongside more bespoke risk assessment from a specialist organisation for cases of honour-based violence, which is available to staff in our student welfare team.

— Midlands institution, stronger practice

4

Staff Training

The findings on staff training represent one of the most significant structural deficiencies identified in this analysis. The majority of institutions do not provide any form of specialist training on harmful practices, and the consequences of this gap are direct and serious.

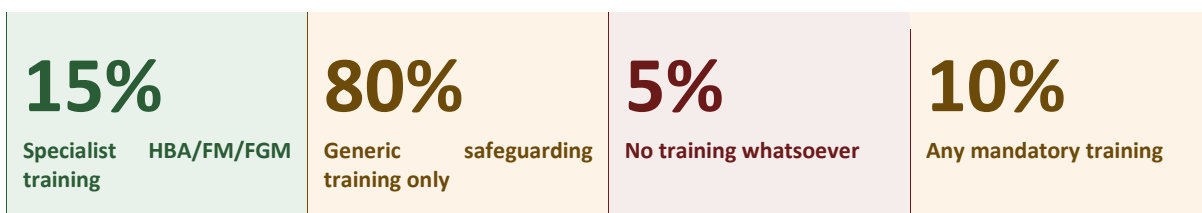
85% of institutions have no specialist training on HBA, forced marriage or FGM.

Only 15% had delivered any specific training on these harmful practices. Of these, fewer than one in ten made such training mandatory.

The overwhelming majority of institutions rely on generic safeguarding training that references harmful practices only incidentally, most commonly as brief definitional content within broader domestic abuse or safeguarding modules. There is a qualitative and consequential distinction between a welfare officer who has completed a thirty-minute online module and one who has received specialist, scenario-based training delivered by practitioners with lived and professional expertise in this area.

The practical implications of inadequately trained staff are not abstract. A practitioner without specialist knowledge of harmful practices is unlikely to recognise the warning signs that distinguish HBA from other forms of abuse; to understand that the threat may originate from a network of family and community members rather than a single perpetrator; or to appreciate that disclosure to a family member, or return of a person to a family environment without appropriate risk assessment, may place them in greater danger rather than less. The cases of *Banaz Mahmod* and *Shafiea Ahmed*, both of whom sought help from professionals in the years before their murders, remain instructive not because the failures in those cases are identical to those at risk within higher education, but because they illustrate with particular clarity what the consequences of professional unpreparedness can be when harmful practices are not recognised for what they are.

Of the 15% of institutions that do offer specialist training, significant variation exists in quality, reach and methodology. The strongest examples involved commissioned, in-person training delivered by specialist organisations with direct expertise in harmful practices. Where training was described as available rather than mandatory, its reach is necessarily limited and its institutional impact inconsistent.



“ There is no specific training for forced marriage, HBA or FGM but all new starters complete training packages that include safeguarding and what a staff member should do if they have a concern.
 — South East institution

“ Student welfare team staff receive training from a specialist organisation on honour-based abuse, including forced marriage and FGM. This has previously been extended to members of the central welfare group and personal tutors.
 — London institution, stronger practice

5 Awareness Raising

86% of institutions reported conducting some form of awareness-raising activity. However, the nature and specificity of those activities vary considerably, and the aggregate figure conceals a more qualified picture.

The majority of awareness-raising activity reported by institutions takes the form of participation in national campaigns, principally the *16 Days of Activism Against Gender-Based Violence* and *National Safeguarding Week*. These campaigns serve an important function in maintaining broad visibility of gender-based violence;

however, they do not constitute specialist engagement with harmful practices. Very few institutions reported standalone, institution-specific campaigns addressing HBA, FM or FGM as distinct forms of harm.

This matters because community-specific visibility is itself a form of safeguarding infrastructure. For individuals from communities where harmful practices occur, the presence of named provision on campus, whether a poster, a named contact, a dedicated web page or a targeted event, can signal institutional awareness and create the conditions for a first disclosure. The absence of such signals reinforces the invisibility that characterises these forms of harm.

“

The university does not currently engage in awareness-raising activities related to forced marriage, honour-based abuse or FGM.

— London institution

6 Support Provision

Most institutions were able to describe some form of support available to students following a disclosure of harmful practices, including welfare and counselling services, academic adjustments, accommodation assistance and signposting to external organisations. A smaller proportion had established named referral pathways to specialist organisations such as the *Forced Marriage Unit*, *Karma Nirvana* or local specialist services.

Dedicated specialist staff roles, such as Independent Domestic Violence Advisers with specific expertise in harmful practices, were reported by a minority of institutions but represent a meaningful indicator of sustained, embedded provision. The quality of support available to a person disclosing a harmful practice is materially affected by whether they are supported by a general welfare officer or by a practitioner with specialist knowledge of the dynamics involved.

7 Policy Coverage

The policy dimension produced one of the most striking findings in the dataset. When asked to provide copies of relevant policies, procedures or guidance relating to harmful practices, only 38% of institutions named HBA, FM or FGM within their response. The remaining either referenced generic safeguarding or domestic abuse frameworks without any specific mention of these practices or indicated that no relevant documentation existed at all.

38% named harmful practices within their policy documentation.

All did so within broader frameworks, not through dedicated provision. No institution held a standalone HBA, FM or FGM policy.

This finding is significant because policy is the mechanism through which institutions signal awareness, anchor procedure and communicate expectation. An institution whose safeguarding policy makes no reference to harmful practices has, in effect, rendered those practices invisible within its own procedural infrastructure. Staff encountering a disclosure of FM or HBA have no named framework to refer to, no indication that their institution has considered these issues, and no procedural guidance distinct from the domestic abuse or general safeguarding processes to which they will inevitably default.

That default is itself problematic. As aforementioned in relation to risk assessment, domestic abuse frameworks and harmful practices responses are not interchangeable. The application of domestic abuse policy to HBA or FM cases, without specialist adaptation, risks responses that are not merely inadequate but potentially harmful to the individuals concerned.

A small number of institutions acknowledged explicitly that they held no relevant documentation of any kind. Several more provided responses of such brevity as to suggest the absence of any meaningful engagement with these issues at a policy level. In both instances, the implication is the same: for the majority of institutions, harmful practices exist outside the boundaries of formal institutional consciousness.

“

The University does not hold any policies, procedures, staff guidance or training materials related to the handling of reports of forced marriage, honour-based abuse or FGM. No such documents exist as of the date of this request.

— South East institution

“

We do not have any explicit policies on these matters but would treat any declaration or instance seriously and use our staff or student procedures to address it, including referral to the police where appropriate.

— London institution

A Sector-Wide Blind Spot: Staff as Victims and Survivors of Harmful Practices

The FOI request explicitly asked institutions to provide information for both staff as victims and survivors and student victims and survivors. Despite this explicit framing, analysis of responses reveals a systemic failure to address the former population in any meaningful or structured way.

~96% of institutions provided no evidence of specific processes or support for staff as victims of harmful practices.

In the overwhelming majority of responses, staff appear only as respondents and trainers, not as people who may themselves be experiencing HBA, FM or FGM.

In the vast majority of institutional responses, references to staff appear exclusively in the context of training them to support student disclosures, or as operators of institutional systems. The question of what happens when a member of staff is themselves experiencing a harmful practice, whether living under honour-based

coercion, at risk of or subject to a forced marriage, or having experienced FGM, was addressed substantively by only a small number of institutions. Even within those responses, provision was largely limited to noting the availability of employee assistance programmes or standard HR processes, without evidence that these pathways have been adapted for the specific dynamics of harmful practices.

This omission is not merely a policy gap; it reflects a conceptual failure. The sector has developed its thinking primarily around students as the population requiring protection. It has not yet extended that framework to its workforce with equivalent rigour. Research by *Dr Roxanne Khan* and colleagues at the *Honour Abuse Research Matrix* (HARM) has documented the under-recognition of harmful traditional practices in workplace settings, noting that organisations of all sizes frequently lack the structures to recognise, receive or respond to disclosures from employees affected by HBA, FM or FGM.

This gap exists within a broader legal and normative context. The *Domestic Abuse Act 2021* places an explicit duty of care on employers in relation to employees affected by domestic abuse, and the statutory guidance accompanying the Act makes clear that employers should consider the impact of domestic abuse on their workforce as part of their health and safety obligations.

The *Employers Initiative on Domestic Abuse* (EIDA), which supports over 2,000 employers representing more than a quarter of the UK workforce, has consistently advocated for workplace policies that extend beyond general domestic abuse provision to encompass the specific circumstances of harmful practices, including FM and HBA.

For staff members from communities where these practices occur, the combination of inadequate institutional provision, the absence of named pathways and the potential professional risks associated with disclosure creates a constellation of barriers that effectively renders them invisible within their own institution's safeguarding infrastructure. Addressing this requires not merely the inclusion of staff in policy documentation, but the active development of HR processes, management training and referral pathways adapted to the specific dynamics of harmful practices.

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For staff: no risk assessment tool used; no formal internal process or procedure in place.

— London institution

“

For staff disclosures, any support would be provided on a case-by-case basis. As we have not received any such disclosures, it is not possible to be more specific.

— South East institution

Notable Patterns and Concerns

Institutions with minimal or refused responses

Thirty-two institutions invoked Section 12 of the FOI Act, indicating that data relating to harmful practices is held across multiple unconnected teams and systems and cannot be retrieved within the statutory cost threshold. As noted above, this represents a safeguarding gap independent of any other considerations. A small number of institutions provided responses of such transience as to indicate the absence of any meaningful safeguarding infrastructure for these specific issues, with several responding in fewer sentences than the original request itself.

The domestic abuse conflation

It is important to acknowledge that the treatment of harmful practices within domestic abuse frameworks is not, in itself, a professional error. The *Domestic Abuse Act 2021* and its accompanying statutory guidance explicitly situate these harmful practices within the broader domestic abuse framework, and *the College of Policing's* authorised professional practice guidance similarly addresses them in this context whilst requiring that practitioners additionally consider the specific risk posed by family and community networks when HBA, FM or FGM are suspected (*College of Policing, 2023*). Practitioners who have categorised disclosures under domestic abuse headings are therefore operating within, rather than against, the existing legislative and professional framework.

The concern identified in this dataset is of a different and more specific order. Situating harmful practices within a domestic abuse framework is a necessary starting point; it is not a sufficient response. The distinctive features of HBA and FM, including multi-perpetrator family and community dynamics, honour as a motivating ideology, potential cross-border dimensions and the particular safeguarding considerations associated with FGM, require specialist understanding and adapted responses that go beyond what generic domestic abuse training and frameworks provide. Where DASH is used as the default and sole risk tool, where staff have received no training beyond a domestic abuse awareness module and where policy makes no specific reference to these practices, the domestic abuse framework becomes a ceiling rather than a floor. The data in this report suggest that for the majority of institutions, it has functioned as precisely that.

Regional variation: Scotland as an instructive comparator

Scottish institutions demonstrated a more consistent baseline response across several dimensions of this analysis, a pattern that reflects in significant part the national Gender-Based Violence strategy and the specialist infrastructure that has developed around it. A number of Scottish institutions referenced the EmilyTest GBV Charter and the associated LISTEN tool, an evidence-based framework developed specifically for higher education settings to support staff in responding to disclosures of gender-based violence. EmilyTest represents a model of what becomes possible when national strategic intent, specialist expertise and institutional commitment develop in sustained alignment: a sector-specific, independently quality-assured framework that raises the floor of institutional practice across participating institutions.

Importantly, this model is no longer exclusive to Scotland. The EmilyTest GBV Charter has recently been piloted with universities in England, shaped in part by the Office for Students' Condition E6 requirements, and in May 2026 the first English institution received the Charter Award. The EmilyTest Network, launched in Autumn 2025, is now open to universities and colleges across the UK and Ireland. This expansion is a significant and welcome development. It also makes the absence of equivalent specialist infrastructure specifically addressing harmful practices, as distinct from gender-based violence more broadly, more rather than less apparent. The sector now has an established model for coordinated quality-assured improvement on GBV. The findings of this Index suggest that harmful practices require the same level of dedicated, specialist attention- and that it is not yet forthcoming.

Recommendations

The following recommendations are directed at higher education institutions, sector bodies and government, based on the evidence gathered across 125 institutional responses.

1

Ensure harmful practices are explicitly named within institutional policy

At a minimum, every institution should ensure that these harmful practices are explicitly named within existing safeguarding, domestic abuse or gender-based violence frameworks, with accompanying guidance that addresses their distinctive dynamics. Situating harmful practices within a domestic abuse framework is a legitimate and legislatively consistent starting point; however, it requires specialist supplementation to be fit for purpose. Policy development in this area should be informed by specialist organisations with direct expertise in harmful practices, trauma informed.

2

Introduce specific recording categories

All disclosure reporting systems should include named, searchable categories for HBA, FM and FGM. Without this, harmful practices disclosures are absorbed into aggregate categories and rendered analytically invisible. Specific recording is a precondition for understanding prevalence, tracking change and making the institutional case for resources.

3

Commission specialist, mandatory training

Generic safeguarding training is not a substitute for specialist provision on harmful practices. Institutions should commission bespoke training on HBA, FM and FGM from organisations with direct expertise in these areas and should make such training mandatory for all student-facing staff and HR personnel. The current position, in which 85% of institutions have no specialist provision, represents an unacceptable gap.

4

Develop explicit provision for staff as victims

Institutional policy, training and support pathways must explicitly address staff as potential victims and survivors of harmful practices, not merely as respondents to student disclosures. This requires the adaptation of HR processes, the development of management guidance and the establishment of referral pathways calibrated to the specific dynamics of HBA, FM and FGM. Institutions should review their obligations under the duty of care provisions of the relevant legislation in this context.

5

Review the adequacy of risk assessment frameworks

Institutions relying solely on DASH as their risk assessment tool for harmful practices cases should undertake an urgent review of whether that tool is appropriate for the structural complexity harmful practices. Specialist assessment tools, including those developed by organisations with specific expertise in harmful practices, should be integrated into institutional risk management processes.

6

Establish and publish external referral pathways

Every institution should develop pre-established relationships with the Forced Marriage Unit, Karma Nirvana, and relevant regional/local specialist services, and should publish these pathways so that students and staff can access them. Referral relationships should be in place before they are needed, not assembled in response to an active crisis.

7

Consolidate data recording infrastructure

Institutions in which disclosure data relating to harmful practices is distributed across multiple unconnected systems must invest in consolidating their recording infrastructure. The inability to retrieve one's own disclosure data within a reasonable timeframe, as evidenced by the 32 Section 12 refusals in this dataset, is not an administrative matter; it is a safeguarding failure that prevents institutional learning.

8

Engage proactively with the shifting legislative and regulatory landscape

The Crime and Policing Act 2026 introduces a statutory definition of HBA and a power to issue statutory guidance to public authorities exercising functions in education, health and policing across England and Wales. Scottish institutions operate within a distinct legislative and strategic framework, shaped by the national Gender-Based Violence strategy and associated statutory duties. Institutions in Northern Ireland are subject to their own regulatory context. Across all four nations, however, the direction of travel is consistent: expectations of institutional responses to harmful practices are rising, and the absence of named policy, specialist training and adequate data recording will become increasingly difficult to defend. Institutions across the UK would be prudent to treat the current period as an opportunity to review policy, commission specialist training and strengthen data recording infrastructure, positioning themselves ahead of rather than in response to evolving expectations in each of their respective regulatory contexts. Those that have invested in genuine, specialist provision for harmful practices will be better placed to demonstrate the quality of their safeguarding practice as scrutiny of this area intensifies across the sector.

Conclusion

The higher education sector has made genuine and sustained progress in its approach to gender-based violence, sexual misconduct and, in some institutions, domestic abuse over the past decade. The infrastructure built around reporting platforms, specialist adviser roles and survivor-led advocacy has improved the experience of many students.

Harmful practices, including HBA, FM and FGM, remain on the periphery of that progress across all four nations. They are acknowledged in principle by most institutions but are rarely the subject of named policy, rarely the focus of specialist training, rarely tracked as distinct phenomena in data systems, and almost never addressed in relation to staff. The FOI data presented in this report makes the scale of that gap legible at a sector level for the first time.

A recurring theme across the findings is the tendency to absorb harmful practices into domestic abuse frameworks- an approach that is legislatively consistent but insufficient without specialist supplementation. Where domestic abuse frameworks become the ceiling rather than the floor of institutional response, the distinctive dynamics of HBA, FM and FGM go unaddressed, and the people affected by them go unseen.

The shifting legislative and regulatory landscape across the UK- from the Crime and Policing Act 2026 in England and Wales to the national GBV strategy in Scotland- signals that expectations of institutional practice in this area are rising. The findings of this Index suggest the sector is not yet positioned to meet them.

The institutions that performed most strongly in this analysis were not consistently the largest or most generously resourced. They were the institutions in which someone had made a deliberate decision to treat harmful practices as a distinct and serious concern and had built provision accordingly. That decision remains available to every institution in this dataset.

About Recultured

Recultured is a specialist training and consultancy organisation working with UK higher education institutions to reform their responses to harmful practices, including HBA, FM and FGM.

Ameera Jamil (*Co-founder*) holds a Law degree from the University of Leeds, where her dissertation examined the extent to which universities incorporated FM and HBA into institutional policy, an early piece of applied research that revealed significant gaps across the sector and laid the conceptual groundwork for the Harmful

Practices Response Index. Ameera brings 14 years of professional experience supporting victims of harmful practices and training practitioners in higher education and related settings, including co-creating domestic abuse policies and developing training across a range of harmful practices for university safeguarding and HR teams.

Fedra Mardani (*Co-founder*) has over 15 years of experience in the voluntary sector, specialising in supporting victims of harmful practices with particular expertise in HBA and FM. Fedra has held roles spanning grassroots advocacy, national helpline provision and higher education safeguarding, and brings substantial expertise in translating frontline knowledge into institutional training and policy development.

Nisa Khan (*Artistic Empowerment Lead*) is a Bloomberg New Contemporaries 2021 recipient whose interdisciplinary practice is informed by lived experience and professional work supporting individuals affected by forced marriage, honour-based abuse and sexual violence. Nisa leads *Recultured's* artist-led peer support programme, which provides a creative and trauma-informed space for students and staff affected by harmful practices.

Recultured's services include bespoke specialist training on harmful practices; access to a risk assessment focused solely on harmful practices relevant to higher education and policy review; institutional support structure development; and artist-led peer support for affected students and staff. The Harmful Practices Response Index will be updated as statutory guidance on HBA develops and as institutional practice across the sector evolves.

If you work in higher education and would like to discuss how Recultured can support your institution, or if you are interested in having the findings of this Index presented at a sector conference, institutional event or professional development session, we would be delighted to hear from you. Please contact Ameera Jamil directly at ameera.jamil@recultured.co.uk to discuss your request.

References

All FOI responses cited throughout this report are anonymised by region. Institutional identities have been withheld. The following references relate to external sources cited in the text.

Here is the updated reference list incorporating all the new sources cited in the changes we made, with the existing references updated where needed and new ones added in the correct academic format:

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Appendix A: Freedom of Information Request — Standardised Question Set

Submitted to all institutions between July and September 2025 under the Freedom of Information Act 2000.

Under the Freedom of Information Act 2000, I am requesting information regarding how your university handles and records disclosures of harmful practices from staff or students, specifically related to:

- Forced marriage.
- Honour-based abuse or violence
- Female genital mutilation (FGM)

Please provide answers to the following questions for **both staff as victims/survivors and student victims/survivors**:

- 1. Disclosure Recording** a. Does your university formally record disclosures or reports related to forced marriage, honour-based abuse, or FGM? b. Are these types of disclosures recorded separately if not recorded using a centralised reporting tool? c. Are specific categories or flags used in your reporting systems to record these harmful practices if they are not specifically named as forced marriage, honour-based abuse and female genital mutilation?
- 2. Volume of Disclosures** For each academic year from 2019–20 to 2023–24, please provide the number of disclosures or reports received relating to: forced marriage; honour-based abuse or violence; female genital mutilation (FGM).
- 3. Response Process** a. Does your university use a risk assessment tool when these disclosures are made? If so, please name the tool or describe the process. b. Is there a formal internal process or procedure in place for managing such disclosures?
- 4. Training** a. Do staff receive any training specifically related to forced marriage, honour-based abuse, or FGM? b. If so, is the training mandatory? What is the frequency and delivery method (e.g. online module, in-person workshop)? c. Are any staff trained specifically to support other staff or students in relation to these issues?
- 5. Awareness-Raising** a. Does the university engage in awareness-raising activities around these harmful practices (e.g. events, campaigns, training)? b. Are these standalone initiatives or tied to national awareness campaigns (e.g. UK FGM Awareness Day, National Safeguarding Week)?
- 6. Support for Students and Staff** a. What type of support is offered to students and staff who disclose experiences related to forced marriage, honour-based abuse, or FGM (e.g. counselling, safeguarding referrals, academic support, discretionary funding, work-related support, on-campus accommodation)? b. Are students and staff aware of such provisions, including those staff members who are supporting the person making the disclosure? c. Are there dedicated support staff or services for this purpose?
- 7. Policies and Procedures** If available, please provide copies of any relevant internal policies, procedures, staff guidance, or training materials related to the handling of forced marriage, honour-based abuse, or FGM disclosures.