

BREAKING THE SILENCE: HOW TO DEAL WITH THE PHENOMENON OF UNDERREPORTING SEXUAL VIOLENCE IN ITALIAN UNIVERSITIES

by *Natalia Castiglioni**

Abstract

Sexual violence in Italian universities remains largely underestimated despite existing prevention tools and policies. Using national and European data, this article examines the structural and relational barriers that hinder reporting, arguing that underreporting stems not only from cultural factors but also from procedural and communicative shortcomings within universities. Current mechanisms rely on victims' self-exposure and institutional trust, which are often lacking. To address this, the article proposes an anonymous first-contact channel integrated into university websites to foster accessibility, trust, and *psychological safety*.

Keywords

sexual violence, gender studies, universities.

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DOI: [10.13131/unipi/sbr4-at48](https://doi.org/10.13131/unipi/sbr4-at48)

INTRODUCTION

In Europe, more than one in two people working or studying in a university environment have experienced at least one form of gender-based violence or harassment during their academic career. According to the results of the UniSAFE project, the phenomenon affects 62% of the university population, but only 13% of these incidents are actually reported, confirming a persistent structural difficulty in transforming the experience of violence into public discourse, even in contexts that present themselves as safe and inclusive.

Even in the Italian context, violence and harassment in the university environment are a widespread phenomenon but little represented in official statistics. The 2022 CRUI Guidelines acknowledge the lack of systematic data and report a "widespread reluctance to report". This trend is also confirmed by the Survey on reports of harassment, abuse and discrimination in Italian universities published by the CRUI in 2024, which records only 243 reports from as many as 80 Italian universities.

These data are even more serious if we consider that most Italian universities have now adopted formal prevention and contrast tools, such as anti-violence desks, single guarantee committees and ethical behavior protocols. However, often the presence of such mechanisms does not seem to translate into an actual increase in trust or reports.

Starting from this framework, the article adopts a conceptual and institutional analytical perspective on the ways in which violence emerges, without positioning itself as an empirical study.

1. THE UNDERREPORTING OF SEXUAL VIOLENCE: THE ITALIAN CONTEXT AND THE RELATIONAL DIMENSION OF SILENCE

Before analyzing the phenomenon of underreporting sexual violence in the university context, it is necessary to frame the issue within the national panorama, so that the analysis can be based on an overall understanding of the dynamics that, in the Italian context, hinder the emergence of violence and its formal denunciation.

According to official data released by the National Institute of Statistics, sexual violence against women in Italy is a widespread but largely hidden phenomenon. The latest ISTAT Survey on women's safety¹

¹ Although the most recent ISTAT reference survey dates back to 2014, it still represents the most comprehensive national source on the prevalence and reporting rates of sexual violence

shows that over 6.8 million women, 31.5% of whom are between the ages of 16 and 70, have suffered some form of physical or sexual violence in their lifetime, and that 5.4% have suffered rape or attempted violence. Although this data outlines a phenomenon of systemic dimensions, the percentage of women who choose to file a complaint remains extremely low. The same report shows that only 11.8% of women who have suffered violence (by a partner or ex-partner in the last five years) have reported the incident to the police, while 4.8% have turned to an anti-violence centre or a specialized service. Most victims, therefore, choose not to activate formal protection channels.

The gap between the number of women who have experienced victimization and those who have formally reported it shows how sexual violence continues to take shape, in the Italian context, as a largely hidden phenomenon. The reasons for the lack of reporting in the Italian female population are certainly many and difficult to identify incontrovertibly, as a case-by-case analysis would be required. However, empirical analyses show that the decision not to report sexual violence is often attributable to common factors. According to the European Union Agency for Fundamental Rights, the most common reasons why women victims of sexual violence in EU countries do not turn to the authorities are fear of retaliation by the perpetrator (33%), lack of trust in the police or the justice system (22%), and the belief that the incident was not “serious enough” to merit a complaint (FRA, 2021). Similar results emerge from the European Institute for Gender Equality, which highlights that underreporting is fostered by fear of not being believed, shame, and fear of negative social consequences, especially in cases of sexual violence perpetrated by acquaintances or partners (EIGE, 2022).

In Italy, data collected by ISTAT confirm this trend: the majority of women victims of violence choose not to report out of shame (44.9%), for fear of not being believed (24%), or out of the desire to forget what happened.

An even more serious condition emerges in the case of people belonging to the LGBTQ+ community, for whom sexual violence and homotransphobic attacks remain largely unreported. According to the EU LGBTIQ II Survey, 10% of LGBTIQ+ people in Italy have suffered a

in Italy. The subsequent monitoring conducted by the Institute, while updating the picture of users of the anti-violence centers and the forms of support available, does not collect directly comparable data on the share of women who report the violence suffered. See National Institute of Statistics (ISTAT), *Violence against women inside and outside the family: year 2014* (ISTAT 2015).

physical or sexual assault in the five years before the survey, and only 8% of victims reported the incident to the police.

The ISTAT–UNAR report indicates that 5.3% of homosexual or bisexual people have suffered at least one physical assault in their lives and that 74.5% say they avoid public displays of affection with their same-sex partner for fear of violence or harassment. This last figure is particularly significant because self-limiting behaviour testifies not only to a widespread perception of insecurity, but also to the normalisation of silence as a survival strategy in contexts perceived as hostile.

1.1. The causes of silence

If we try to identify the main reasons that push victims of violence to silence, it is useful to look at the international literature, which has amply demonstrated that the difficulty of reporting sexual violence cannot be reduced to a matter of individual will. The very possibility of speaking, of being believed and of feeling safe in doing so, depends on the existence of a social and institutional context that recognises the seriousness of violence and protects those who suffer it. Silence, in this sense, is the result of a set of psychological, cultural and normative conditions that limit the possibility of exposing oneself.

In the field of organisational psychology, Amy Edmondson (1999: 354) introduced the concept of *psychological safety* to indicate the degree of interpersonal trust and freedom from judgment that allows individuals to take communicative risks without fear of consequences or humiliation. Applied to the field of sexual violence², it suggests that reporting only becomes possible when the victim perceives that they are in an environment in which it is psychologically safe to expose themselves, a context that recognises their vulnerability and protects their integrity. Therefore, where such security is lacking, silence can constitute a rational form of social self-defence.

²Amy C. Edmondson (1999) introduces the concept of *psychological safety* to describe work environments in which individuals feel free to express themselves without fear of sanctions or judgment. Although originally formulated in an organisational context, the notion has subsequently been applied in educational and health-care settings to analyse interpersonal trust and the freedom to report errors or abuse (see also Jones et al., 2024). The latter study, conducted by the U.S. National Institute of Justice among K-12 educators, shows how a lack of *psychological safety* often leads teachers to remain silent in the face of problems or misbehaviour, turning silence into an adaptive strategy rather than a sign of disengagement.

Jennifer J. Freyd (1996: 7), with her theory of the *trauma of betrayal*, has shown that silence or the removal of violence³ does not necessarily derive from a lack of will, but can represent a form of self-protection when the perpetrator of the abuse is a figure on whom the victim depends emotionally or materially. In these cases, acknowledging betrayal would mean questioning the very bond from which the person derives security, and therefore, silence becomes a relational survival strategy. In later work, Freyd extended this theory to the institutional dimension, coining the concept of *institutional betrayal* to describe situations in which entities such as universities, religious organisations, or the military betray the trust of those who rely on them for protection and justice⁴. When institutions minimise, ignore, or conceal reports of violence, they not only perpetuate the abuse but generate a second wound, that of systemic betrayal. However, distrust of the institution does not arise exclusively from previous experiences, lived in the first person by the victim, of lack of support, but can also develop early, following the perception of a hostile context or an organisational culture that tends to protect the institutional reputation rather than the safety of people⁵. At the university, this preemptive distrust translates into the fear that the news will lead to retaliation, loss of credibility or isolation, thus reproducing a vicious circle of silence and structural distrust.

Also important was the contribution of Liz Kelly (1988: 139), who described male violence against women as a continuum of practices

³ On a psychological level, the “removal of violence” does not indicate a voluntary act of oblivion but a defensive psychic process through which the victim tends to dissociate, minimise, or deny the traumatic event in order to protect themselves from pain and from the risk of losing the emotional or social ties on which they depend. This mechanism is widely described in trauma literature as a form of adaptation to situations in which the aggressor is also a figure of trust or authority. In such cases, lack of awareness or silence does not equate to complicity but represents a mode of emotional and relational survival (Freyd, 1996; Herman, 1992).

⁴ Lack of institutional response, minimisation of abuse, or protection of perpetrators can produce a “second victimisation”, amplifying the initial trauma. In the university context, Freyd (2013) has shown how trust betrayed by academic authorities generates fear of reporting and reinforces the silence of victims. Subsequent studies confirmed that *institutional betrayal* exacerbates the psychological effects of sexual violence and prevents survivors from seeking help (Smith & Freyd, 2014).

⁵ This corresponds to the notion of anticipated *institutional betrayal*, a form of distrust that precedes any direct experience of institutional failure and stems from the perception that the environment is unsafe or unreceptive to complaints. Such pre-emptive perceptions arise from cultural cues, shared experiences, or organisational practices that implicitly communicate the priority of institutional reputation over the protection of individuals. In this sense, victims do not rationally foresee betrayal but emotionally anticipate it, following collective patterns of behaviour (Freyd, 2018; Smith & Freyd, 2014; Monteith, Holmgren & Supple, 2016).

ranging from sexist jokes to the most extreme abuses, rooted in models of power and control that permeate daily life. Women's silence, in this perspective, is the result of a process of socialisation to fear and respectability, which pushes women to minimise violence to avoid stigmatisation and to maintain a semblance of social security. Similarly, Ezzat A. Fattah (1993: 121) pointed out that reactions to violence are shaped by cultural expectations and gender roles: in contexts where victim blaming and justification of the aggressor prevail, failure to report becomes a form of normative compliance. Denouncing, in this sense, takes on the value of a symbolic transgression, an act that breaks the balance of power and challenges the cultural codes of confidentiality and self-blame. An act, therefore, particularly difficult for the victim to carry out.

A further layer of complexity emerges if we consider the experience of LGBTQ+ people, often exposed to forms of sexual violence aggravated by stigma and social marginalisation. In the last twenty years, international literature has shown how much more difficult it is for individuals in this community to denounce and recognise the violence suffered. One of the most established theories is the *Minority Stress Theory*, developed by Ilan Meyer (2003), which argues that people belonging to sexual and gender minorities experience chronic stress resulting from three main factors: social stigma, institutional discrimination and internalisation of prejudice. This minority stress is not episodic, but systemic and derives from exposure to contexts in which identity is often problematized, hidden or denied. It follows that any act of public exposure, including reporting violence, carries an additional risk of outing, isolation or loss of belonging, and is therefore avoided as a protective mechanism. In this sense, silence becomes a form of rational adaptation to an environment perceived as hostile, consistent with the traumatic patterns of betrayal described by Freyd.

Empirical studies have shown the application of this concept in reality, such as those by Rebecca Stotzer and the U.S. Transgender Survey (2009), where it was observed that more than half of the trans people interviewed had suffered sexual harassment or violence, but less than a third filed a complaint. The main reasons detected, also in this case, were the distrust of the police and institutions, the fear of being mocked or further discriminated against, and the awareness of not falling within the classic regulatory standards of "credible victim".

Therefore, all the theories presented so far converge in showing something fundamental, and that is that even just talking about violence is never an isolated act, but the result of social and institutional conditions that make speech possible. When reporting continues to be conceived as

an act of individual initiative, the whole weight of the process of reporting violence is transferred to the victim, asking them to act, to expose themselves and to take risks that derive precisely from those same conditions of insecurity and dependence that the theory of *trauma of betrayal* highlights. Institutions, including universities, are fully involved in this mechanism. While declaring that they want to counter violence and support victims, they often end up reproducing the logic that attributes to the offended person the responsibility of breaking the silence. A responsibility that, data in hand, victims often cannot assume.

2. THE RESPONSE OF ITALIAN UNIVERSITIES TO SEXUAL VIOLENCE: LIMITS AND CRITICAL ISSUES

The first concrete initiatives of Italian universities in response to violence in universities date back to the early 2000s, thanks to three converging factors. The first was of a regulatory nature, with the approval of the *Code of equal opportunities between men and women (Legislative Decree 198/2006)*, which sanctioned the principle of equal treatment at work and in training. The second was cultural and international: the growing attention to gender-based violence on university campuses, which developed in the United States and Northern Europe, has begun to place the issue also on the Italian public agenda. The third decisive factor is the ratification of the *Istanbul Convention* in 2013, which introduced for the first time an explicit obligation for public institutions to prevent and combat violence against women, including forms of violence and sexual harassment.

In the years since, the European recommendations for the inclusion of violence prevention measures in gender equality plans (GEPs)⁶ have helped to consolidate this trend. Since 2022, in fact, the adoption of a GEP has become a necessary condition for accessing Horizon Europe research funds⁷, prompting all Italian public universities to formalise strategies and protocols on equality and the fight against violence.

⁶ Gender Equality Plans (GEPs) are strategic governance tools introduced by the European Commission to integrate the gender perspective into university research, teaching, and administration. The obligation to adopt a GEP as an eligibility criterion for access to Horizon Europe funds has transformed gender equality from an ethical principle into a structural condition of institutional legitimacy (European Commission, 2021; CRUI, 2022).

⁷ Horizon Europe is the European Union's framework programme for research and innovation (2021-2027), successor to Horizon 2020. It is the main instrument of European policy in support of science and competitiveness, with a total budget of over 95 billion euros. In addition

However, the transposition of all these principles has often resulted mainly in a series of administrative obligations, rather than a profound cultural transformation. In particular, the current framework of Italian universities is based on what we could call the "model of administered protection"⁸, i.e. a set of tools that formally guarantee protection, but which in practice fail to really reach all, or at least the majority, of the people for whom they should be intended.

In Italian universities, there is no shortage of regulations, counters, or figures in charge of managing reports. The problem is that often these tools are designed from the point of view of the institution, not from that of the victim, responding to a need for conformity and internal order rather than to a real listening to the needs of those who suffer violence.

If we look at the most recent available institutional data, two main instruments emerge in the management of sexual violence: the Confidential Counsellor (*Consigliera di fiducia*) and anti-violence services/listening desks⁹. Concerning the Confidential Counsellor, a survey conducted across 98 universities and published by "Equal – Rivista di diritto antidiscriminatorio" reports the presence of this role in 41 universities. According to the 2024 report of the CRUI, which considers 80 universities out of a total of 85, listening desks are active in 65.4% of the responding universities, counselling services in 80.3%, and anti-violence centres in 25.4%¹⁰.

to funding research and international cooperation projects, the programme aims to promote an inclusive and equal academic environment, making the adoption of a Gender Equality Plan an essential requirement for access to funds.

⁸ The term "model of administered protection" does not refer to an established doctrine but to an analytical category introduced in this article.

⁹ It should be noted that Italian universities also have other institutional bodies, such as the Single Guarantee Committee (*Comitato Unico di Garanzia*, CUG) and Psychological Counselling Centres, which perform complementary functions in the field of equal opportunities and well-being. In this context, however, only the Confidential Counsellor and the anti-violence desks are mentioned, as they represent the most widespread and specifically designed tools to address cases of violence and sexual harassment, in accordance with the CRUI Guidelines (CRUI, 2022; University of Pisa, 2023).

¹⁰ The two sets of data derive from different sources and refer to distinct dimensions: the CRUI survey provides institutional data on reporting procedures and support services, while the Equal report is based on a documentary analysis of university regulations and therefore concerns the formal presence of the Confidential Counsellor. At present, no national centralized dataset systematically collects information on the presence of this figure across Italian universities. See: Equal – Rivista di diritto antidiscriminatorio, *La Consigliera di Fiducia negli Atenei italiani: una ricognizione sui siti istituzionali*, 2022; Conferenza dei Rettori delle Università Italiane, *Indagine sulle segnalazioni di molestie, abusi e discriminazioni nelle università italiane*, report aggiornato al 4 November 2024.

Appointed by the Rector or the Board of Directors and in charge of receiving reports relating to harassment, discrimination or conflicts, the Confidential Counsellor is an institutional figure, but with a role defined in broad and deliberately "neutral" terms, which must guarantee confidentiality, listening and guidance, without exercising decision-making or disciplinary powers. In most cases, the procedure is always the same: the person who suffers violence or harassment must write an email, ask for an interview and tell what happened. At the end of this, the Counsellor can propose mediation or transmit the case to the university's Single Guarantee Committee (*CUG*).

This approach, even if it formally guarantees, has obvious limitations. Specifically, the reports cannot be anonymous, and the entire procedure is based on the individual activation of the victim. The system, therefore presupposes a high degree of trust and security on the part of the whistleblower towards the Counsellor, precisely those elements which, as demonstrated by the literature analysed above and by the empirical data collected by the latest EU and Italian surveys, are lacking in situations of violence.

Many universities have also introduced anti-violence or listening desks, often created in collaboration with local associations or specialised centres. Their declared function is to offer a space for reception and psychological support, but they do not constitute a formal channel of denunciation. A more advanced step has been taken by some universities, including the University of Turin and the Polytechnic University of Turin, which have participated in the European project SUPERA – Supporting the Promotion of Equality in Research and Academia (Horizon 2020). The program, launched in 2018, aimed to create Gender Equality Plans and the adoption of concrete measures for the prevention of harassment and discrimination, through training, awareness-raising and mapping of institutional risks.

2.1. The condition of trust and why universities do not listen

The adoption of these tools, however, is based on a problematic assumption: that of trust between those who suffer violence and the institution that offers help. As international data show, this hypothesis does not correspond to reality. The entire protection system of the University is based on the idea that the victim can feel safe in turning to the university, perceiving the environment as welcoming and impartial. But this hypothesis, however desirable, does not always find a concrete application. Despite the undeniable progress made in recent years in terms of inclusion and equality policies, the relationship of trust

between students and higher education institutions remains fragile. Many students, in fact, do not perceive the university as a neutral or protective place, but as a hierarchical, competitive space that is not very sensitive to personal discomfort. In this context, even the most structured programs risk remaining inaccessible for the very people who should benefit from them.

Just look at the most recent international surveys that have investigated the relationship between students and universities, highlighting how the low propensity to report violence or harassment in the university environment is closely linked to a lack of trust in the institution.

To name just a few, in the United States, the Campus Climate Survey on Sexual Assault and Misconduct promoted by the Association of American Universities (AAU) in 2019 (conducted on over 180,000 students from 33 universities) showed that less than 30% of people who experience sexual harassment or violence contact the university's official resources. Among the main reasons are the belief that "nothing would be done", "one would not be believed" or the fear of academic and social retaliation. Similarly, the National Student Safety Survey conducted in 2021 in Australia found that more than half of students who experienced violence did not talk about it with anyone: among the most frequent reasons are a lack of trust in the confidentiality of trials, embarrassment and the belief that reporting could damage their academic careers. The same survey carried out by UniSAFE in 2022, already mentioned at the beginning of this article, confirms that this dynamic of distrust also in the European context, where out of a sample of over 42,000 people in 15 Member States, 62% said they had suffered at least one form of violence or harassment in the university environment, but only 13% filed a formal complaint. The main causes identified are, also in this, the perception of an unsafe environment, the fear of not being taken seriously and the belief that the institution would not act effectively.

This problem is accompanied by another, already introduced in chapter 1, which concerns the logic of the victim's responsibility. As we have seen, conceiving the complaint as a gesture of individual initiative means placing the full weight of action against violence on the shoulders of the offended person. In the case of universities, this logic translates into procedures that, although created to protect, end up replicating the same isolation scheme already described in theory.

In the case of the Trusted Counsellor, the procedure requires the victim to contact him directly, usually by e-mail or online form,

providing his or her data and a brief description of what happened. The figure of the Trusted Counsellor is often covered by a lawyer, therefore, a professional with a strongly institutional profile. As a result, in the eyes of the students, the reports could appear as formal acts rather than moments of listening, and the relationship with the Counsellor thus risks taking on a detached and hierarchical tone.

The same goes for the anti-violence or listening desks, which are actually created with more empathetic and informal purposes. Even here, however, access is voluntary and individual, and it is the person who must look for the counter, make an appointment, and tell his or her story. In addition, the hourly availability of these desks is often limited, sometimes to a few hours a week, and in several universities, it is only possible to access them in person, subject to reservation or on-site interview. For those who experience discomfort, a situation of fear or shame, this rigidity represents a further obstacle. Having to physically walk through a door or confront an unknown person face-to-face can discourage the very people who would need help the most.

3. A PROPOSAL FOR REPORTING SEXUAL VIOLENCE IN UNIVERSITIES

As emerged from the analysis conducted in the previous chapter, the most evident limitation of the protection systems in use today does not lie in their absence, but in the way they are perceived and experienced by those who should be able to access them. This raises an issue that is also legal: that of effective access to justice. Indeed, Article 47 of the Charter of Fundamental Rights of the European Union enshrines the right of everyone to an effective remedy and to a fair trial, placing the obligation on public institutions, including academic institutions, to ensure not only the formal availability of protection mechanisms, but also their effective accessibility. Accessibility presupposes that institutions can welcome vulnerability and offer spaces in which asking for help does not generate fear, shame or is based on a preventive trust in the university, which, in fact, cannot be taken for granted.

The picture that emerges is not that of institutional inertia or negligence, but rather that of unfinished courage. It is in this direction that the concept of *institutional courage* developed by Freyd (2018) is placed, understood as the ability of institutions to recognise their limits, listen to the victims and transform their procedures more humanely and transparently.

Linked to this approach is the concept of *trust by design*, according to which trust cannot be imposed or required, but must be built through the very design of institutional processes. It is therefore not the person who must trust the university "a priori", but it is the university that must inspire trust through consistent behavior, clear tools and communication methods that respect discomfort and fear. In this sense, access to justice is only fully realized when people can exercise their rights without feeling exposed, isolated or judged.

3.1. Project proposal: anonymization as a tool of trust and first access to protection

The first moment of reporting a sexual assault, or the first request for help, represents the most delicate phase of the entire protection process. It is in this passage that the person is faced with the risk of exposing himself, of not being believed and of having to face, alone, the emotional weight and consequences of a gesture that he is often not psychologically ready to make. Precisely in this phase, the university system shows its greatest fragility: in asking the victim to act actively and to tell their story, and to do so by making their identity explicit, the institution risks reproducing that logic of individual responsibility that leads many people to remain silent. It is from this moment of hesitation, in which the need to speak clashes with the fear of doing so, that a different model of protection must start.

The anonymisation of reports fits exactly into this critical point. Empirical studies on reporting behaviour in university settings have observed that victims of sexual violence rarely turn directly to formal institutional procedures and tend to disclose the experience only when they can maintain control over their personal identification and over the consequences of speaking. For instance, the national study conducted in the United States by Bonnie S. Fisher and colleagues found that victims were significantly less likely to use official reporting channels when disclosure implied immediate identification, while forms of communication perceived as less exposing were more frequently used¹¹.

Anonymity can offer a protected space of speech, in which the person can begin to tell without the pressure of immediate recognition, transforming vulnerability into a welcomed and unproblematic condition.

¹¹ Similar results emerge in the field of organizational behaviour. Research on whistleblowing has shown that individuals are more willing to report misconduct when communication channels allow them to express concerns without immediate identification and to evaluate the institutional response before initiating a formal complaint (See Near & Miceli, 1985).

In particular, the proposal put forward here consists of the creation, within the institutional websites of the universities, of a digital channel for first listening dedicated to situations of sexual violence. It would be a secure online platform, where people can write anonymously and start an email exchange with a qualified figure, such as a psychologist or a consultant outside the university hierarchy. The system would ensure full confidentiality, allowing communication without the person's address being visible.

The goal is not to collect formal complaints, but to offer a first space for speech free from the fear of exposing oneself. Unlike online forms or traditional reporting procedures, this channel is based on a human and non-standardised exchange that gives the person back the time and the way to express themselves at their own pace. Writing an e-mail, without the need to identify oneself or set up a meeting, allows you to start a more intimate and reflective dialogue, which can gradually evolve into a path of awareness and, if the person wishes, of denunciation (through other channels).

The reference figure would not have a bureaucratic or disciplinary role, but one of listening and accompaniment. Its task would be to welcome the story, provide clear information and, only on request, direct you to existing services. In this way, the channel would not replace the current mechanisms, but would make them more accessible, becoming an intermediate threshold between silence and denunciation.

It is important to underline how this proposal differs from the anti-violence desks already present in many universities. The counters, although designed with the purpose of listening and support, almost always require physical access or reservation, and guarantee direct contact with recognisable operators. This inevitably implies a first act of public exposure that many victims do not feel ready to face. In addition, the availability of hours and the "institutional" nature of these desks (often located in open university environments or integrated into administrative structures) can generate discomfort, embarrassment or fear of being seen. The proposed channel, on the other hand, would remove precisely these barriers, offering immediate and anonymous contact and would be a way to ask for help without physically crossing a threshold or having to interface immediately with "flesh and blood" people, when you are not yet ready to do so.

A system of this type responds to the peculiar characteristics of sexual violence, which more than any other form of abuse generates feelings of shame, guilt and confusion. A further benefit concerns the protection of people belonging to the LGBTQ+ community, who, as observed by the

surveys mentioned above, often face additional barriers in accessing reporting mechanisms. Digital anonymity can reduce the fear of outing, stigmatisation, or discrimination, promoting safer and more inclusive communication for them as well.

Furthermore, as shown in Chapter 1, the European research pointed out that many victims do not immediately recognise the incident as violence or tend to minimise it, believing that it is not "serious enough" to justify reporting (UniSAFE, 2022). In these cases, being able to write anonymously is often the only possible way to start telling, without the pressure of having to immediately define the experience as violence or to initiate a formal procedure. Even a short message, such as: "I have experienced this situation, could it be considered a form of sexual violence?", can become the beginning of a dialogue that helps the person to give a name to what happened and to understand that there are paths of help available.

3.2 Legal feasibility of the proposal

It should be noted that the aim is not to introduce a new complaint mechanism, but to create a preventive and protected level of communication, which is fully within the framework of the right of effective access to the protection and protection of personal data. The creation of this anonymous university listening channel for victims of sexual violence is therefore consistent with the provisions of national and EU law.

In particular, the proposal is based on specific regulatory frameworks, which I will illustrate below. Each of these sources offers elements that, if integrated in a coherent way, legitimise the adoption of anonymous or confidential reporting tools, provided that they are aimed at protecting the fundamental rights of the individual.

Firstly, the GDPR expressly permits the processing of data in anonymised or pseudonymised form¹² for purposes in the public interest or in the exercise of official authority (Art. 6 para. 1 lit. e)¹³). Recital 26 of the Regulation states that the privacy rules do not apply to "anonymous" data, i.e. those that do not allow the direct or indirect

¹² Anonymisation (outside the GDPR) must be distinguished from pseudonymisation (within the GDPR). The distinction is clarified in Regulation (EU) 2016/679 of 27 April 2016 (General Data Protection Regulation), recital 26 and Article 4(5), as well as in the European Data Protection Board (2025) Guidelines 01/2025 on Pseudonymisation and ENISA (2019) Pseudonymisation Techniques and Best Practices.

¹³ Cfr. reg (EU) 2016/679 of 27 April 2016 [2016] OJ 2016 L 119, p. 1. 1 (Article 6(1)(e), Article 6(3)).

identification of the data subject. This means that a communication system that allows the exchange of messages without the registration or visibility of the user's e-mail address does not fall within the scope of the processing of personal data, provided that the structure guarantees the impossibility of re-identifying the person¹⁴. The use of technical aliases or anonymisation protocols is therefore compatible with the GDPR¹⁵ and responds to the principle of data minimisation (art. 5, par. 1, letter c), according to which only the information strictly necessary for the purpose pursued must be collected¹⁶.

A regulatory reference at the national level is offered by Legislative Decree no. 24 of 10 March 2023, which transposed Directive (EU) 2019/1937 on whistleblowing. Although it mainly concerns reports of wrongdoing in the workplace and in the administrative field, the legislation introduces a general principle of protection of the whistleblower that can also be applied by analogy to contexts of protection against violence. Article 6, paragraph 3, of the decree recognises the legitimacy of anonymous reports, provided that they contain sufficient elements to allow the assessment of the facts. The rationale of this provision is clearly to encourage reporting by eliminating fear of retaliation or personal exposure. It is the same logic that underlies the proposed channel, whose purpose is to encourage the emergence of cases of sexual violence by eliminating the perceived risk of stigmatisation or loss of control.

Further references confirm the compatibility of the proposed model

¹⁴ Truly anonymous data do not fall within the scope of the GDPR, but the risk of re-identification must be assessed in practice. This principle is established in Regulation (EU) 2016/679 of 27 April 2016 (General Data Protection Regulation), recital 26, and clarified by the Court of Justice of the European Union in *Patrick Breyer v Bundesrepublik Deutschland* (2016, Case C-582/14, ECLI:EU:C:2016:779). Further guidance is provided by the former Article 29 Working Party (2014) Opinion 05/2014 on Anonymisation Techniques.

¹⁵ This interpretation is grounded on a systematic reading of the GDPR, particularly on the principle of data minimisation and on the distinction between anonymisation and pseudonymisation. These principles are set out in Regulation (EU) 2016/679 of 27 April 2016 (General Data Protection Regulation), recital 26 and Articles 4(5) and 5(1)(c), and further specified by the European Data Protection Board (2025) Guidelines 01/2025 on Pseudonymisation, the former Article 29 Working Party (2014) Opinion 05/2014 on Anonymisation Techniques, and ENISA (2019) Pseudonymisation Techniques and Best Practices.

¹⁶ The reference to the principle of minimisation supports the decision to collect only the information that is strictly necessary for the intended purpose. This principle is set out in Regulation (EU) 2016/679 of 27 April 2016 (General Data Protection Regulation), Article 5(1)(c), and further clarified by the European Data Protection Board (2025) Guidelines 01/2025 on Pseudonymisation.

with current legislation. Law no. 69 of 19 July 2019 ("Red Code") strengthened the protection of victims of gender-based crimes, introducing accelerated procedures and faster times for the acquisition of information from the offended person in the event of sexual violence, mistreatment or stalking. Although it refers to the phase following the complaint, the rationale of the law is to guarantee an immediate hearing and timely protection. An anonymous listening channel is fully part of this "early intervention" logic, making it possible to request help before the complaint is formalised. In addition, Decree-Law No. 93 of 14 August 2013, converted with amendments by Law No. 119 of 15 October 2013, provided for the Extraordinary Action Plan against sexual and gender-based violence, establishing and regulating Anti-Violence Centres and Shelters. These facilities, which are also regulated at a regional level, offer reception and listening anonymously and free of charge, often through public utility numbers such as 1522. The proposed channel goes along the same lines, but expands its accessibility: while the Anti-Violence Centres operate on the regional or national territory, it would provide a digital point of contact in a university context, designed for victims who, for reasons of fear, shame or distance, are unable to contact regional or national structures in person.

In terms of legitimacy for the university institution, the Criminal Code and the Code of Criminal Procedure confirm that the activation of an anonymised listening channel is fully compatible with the current system, as long as it is managed by subjects who cannot be qualified as public officials or persons in charge of public service. Pursuant to Articles 361 and 362 of the Criminal Code and Article 331 of the Code of Criminal Procedure, the obligation to report to the judicial authority exists only for these figures in the exercise of their functions. For ordinary citizens, on the other hand, the reporting of a crime is not mandatory, except for special exceptions provided for by law. It follows that a university listening channel, if entrusted to external professionals who do not exercise public functions, such as psychologists, counsellors or consultants trained in gender-based violence, can legitimately collect communications and information anonymously or confidentially, without incurring the immediate obligation to report to the competent authorities.

Finally, the proposal is fully consistent with the Council of Europe Convention on preventing and combating violence against women and domestic violence (Istanbul Convention), ratified by Italy with Law No. 77 of 27 June 2013. Articles 18 to 20 require States to guarantee victims access to "timely, accessible and confidential" support services that protect the safety and dignity of the person. In particular, Article 20

provides for the adoption of "specialist assistance services" aimed at providing counselling and psychological support even in the preliminary stages of reporting.

3.3. Technical feasibility of the proposal

From an IT point of view, the implementation of an anonymised listening channel within university websites is potentially achievable with the technologies available today and at low cost. The system can be conceived as a protected e-mail relay, i.e. a mechanism that allows the exchange of e-mails between two subjects (the person who writes and the professional who answers) without either of them knowing the real address of the other. This recreates a private and secure digital correspondence that is free from any form of direct tracking or identification.

The operation of the channel is based on simple logic. The person accesses a dedicated section of the university website from which they can activate an anonymous contact with a single click, without entering personal data or filling out forms. The system automatically generates a virtual email address, called an alias, which serves as a communication interface. All e-mails sent and received through that alias pass through an intermediate server managed by the university or by a certified external provider, which takes care of rewriting the sender and recipient addresses in order to make them unrecognisable.

The technical heart of this mechanism is a secure SMTP relay configured to erase any metadata that could reveal the user's identity or IP address. Each message is encrypted during transit and temporarily stored on a secure server, according to the security criteria provided by the European General Data Protection Regulation (GDPR). Email headers are cleaned up (header cleanup) and replaced with neutral fields, eliminating any reference to the network path, email client, or device used. This allows a very high level of technical anonymity since not even the university system administrators, under normal conditions, have been able to trace the user's original address.

The database that manages the correspondence between aliases and real addresses is encrypted and accessible only to a dedicated microservice, which controls its automatic sending and deletion after a predefined period (e.g. ninety days). This period can be reduced or eliminated at the request of the person writing, through a unique code generated at the time of creation of the alias. In this way, the victim retains full control over the duration of their communication and the fate of their messages, in line with the principle of accountability of the data controller.

From an infrastructural point of view, the system can be hosted on an internal University server, in an isolated area of the University network, or on an external infrastructure compliant with international security standards (e.g. ISO/IEC 27001). In either case, management should include end-to-end encryption protocols, two-factor authentication for authorised personnel, and data loss prevention procedures to prevent any unauthorised access. All communication must transit over TLS connections and use encryption keys stored securely, preferably in a hardware management system (HSM or KMS).

The proposed structure, although technologically sophisticated, makes use of tools widely tested in the public sector. In Italy, platforms such as *GlobaLeaks* and *WhistleblowingPA* are already used for the management of confidential reports and are based on the same principle of anonymisation of the sender and recipient. Their architecture can be adapted for a different purpose: not to denounce administrative offences, but to offer a place of protected and relational listening for those who have suffered sexual violence. In this version, the system would have no disciplinary or evidentiary function, but only communication and guidance.

From a management point of view, the university would maintain a role of technical supervision and ethical guarantee, while the direct management of communication would be entrusted to external figures such as psychologists, consultants or operators of affiliated anti-violence centres. This choice has a double function. On the one hand, it guarantees the neutrality of the service and prevents communication from falling within the administrative or disciplinary sphere of the university, thus avoiding the obligation of automatic reporting. On the other hand, it strengthens the perception of security for the user, who can interact with a non-institutional professional figure, trained in listening and who can, through empathetic and informal dialogue, direct them towards more coherent help tools already present in universities (such as anti-violence desks or the Trusted Counsellor). The introduction of an anonymised channel may nevertheless raise certain organisational concerns. Lowering the access threshold could generate a high volume of communications, including exploratory, non-serious, or unrelated messages, potentially increasing the workload for university staff. This risk, however, can be mitigated through a gradual structuring of the contact. The channel may provide preliminary information and guidance before direct interaction with operators, allowing users to clarify doubts and understand the scope of the service. Direct engagement with trained personnel would therefore be reserved for communications that indicate an actual need for support.

The entire process, from the drafting of the first message to the final deletion, therefore, takes place in a completely encrypted and anonymous environment, in which the person always retains the freedom to decide whether to continue, interrupt or reveal their identity. The simplicity of the interface reduces the psychological barrier to use, considering that no login, no digital signature or report form is required, but only the ability to write a message informally. The user experience itself is designed to reproduce the naturalness of a private conversation via email, but with the technical guarantees typical of a high-security system. The use of temporary aliases, the automatic deletion of messages, the impossibility of tracking IP addresses and the supervision of the university's Data Protection Officer ensure full compliance with the GDPR and national regulations on the processing of sensitive data. The adoption of protocols that have already been validated in the whistleblowing sector also allows them to be implemented quickly, sustainably and with low legal risk.

CONCLUSIONS

This work stems from the need to question the real meaning of protection against sexual violence in university spaces. The analysis showed that the problem lies not so much in the lack of tools, but in the way they are experienced: often perceived as formal, distant, unable to accept the fear, shame and fragility that follow an experience of violence. It is in this space that the proposed reflection is inserted, which consists in rethinking the moment of the first word, when the person is often in a condition of immobility between silence and the possibility of asking for help.

Hence the proposal for a digital and anonymized listening channel. It is not an alternative to the tools already often present in universities, but a bridge to them. A digital space of first contact, which allows you to write without exposing yourself, to ask for an opinion, to understand if what you have experienced can be defined as sexual violence. The procedure, however, cannot be understood as a mere system for transmitting information. In this perspective, perceived safety precedes the use of the service. Research on help-seeking behaviour shows that immediate identification often entails a relational cost that discourages contact, whereas the possibility of communicating anonymously allows individuals to retain control over their narrative and to gradually assess the reliability of the interlocutor. Anonymity, therefore, operates not merely as a guarantee of confidentiality but as a relational condition that facilitates the initiation of the helping relationship. It is a way of

recognising vulnerability as part of the right to protection, giving the person back control of his or her time and speech.

Rethinking the protection of victims of sexual violence also means, ultimately, rethinking the way institutions conceive of themselves. Universities, like most public administrations, often tend to design their services by looking at them from above, with the gaze of those who provide them and not those who live them. It is a perspective that privileges formal correctness, regulatory compliance and the image of the entity, but which is rarely measured by the concreteness of human experience. This proposal consists precisely of a reversal of perspective: looking at the system from the side of the person.

A university that chooses to accept even the most hesitant words does not weaken its authority but strengthens it. It shows that care and listening can coexist with competence, and that protection is not only a legal obligation, but a form of presence. The challenge is not to create other tools, but to make existing ones more humane, closer and more responsive to the concrete needs of individuals.

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