

# **Staff and Students Relationships Policy**

This policy is of relevance to staff / students/ applicants

Version No. 2

Approved by the Board of Governors

Written by Registry & Human Resources

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## 1. Introduction

- 1.1. Positive professional relationships between students and members of staff are an important part of supporting our students' academic and training journey at the School. However, when relationships between staff and students become personal in nature, they may lead to actual or perceived imbalances of power or authority, accusations of bias or exploitation, and questions about the nature of consent. This can undermine trust and confidence in the training process, impair academic progress and negatively affect the welfare of the student.
- 1.2. To provide a positive, safe and supportive training and learning environment, this policy sets out the School's position on personal relationships between staff and students, where these are of an intimate or close personal nature.
- 1.3. This policy applies to all staff, but particular provisions are set out for those members of staff who have direct or indirect training and educational responsibilities, or other direct professional responsibilities in relation to a student. These are referred to as *Relevant members of staff*.
- 1.4. **Relevant members of staff are prohibited** from pursuing or entering into an **intimate relationship or a close personal relationship** with any student for whom they have any direct or indirect academic or training responsibilities, or other direct professional responsibilities. Failure to comply with this policy will be considered as a staff disciplinary matter in line with the [City of London's Staff Disciplinary Procedure](#).
- 1.5. Any allegation of an intimate relationship between any member of staff (whether they meet the definition of a relevant member of staff or not) with a student under 18 or a student who would be considered an adult at risk under safeguarding legislation will be referred to the Local Authority Designated Officer (LADO) and/or the Police.
- 1.6. Relationships that are coercive, exploitative or sexualised are always unacceptable and must not occur. All staff have a duty to behave appropriately towards students, to act with integrity in their work and to avoid placing themselves in positions of actual or perceived conflict.
- 1.7. Where an intimate or close personal relationship exists when a member of staff is appointed or when a student enrolls at the School and the member of staff would ordinarily be a Relevant staff member to a student, it is the responsibility of the member of staff to inform their Head of Department/ Programme Leader (or nominated representative), in order that alternative arrangements can be made.
- 1.8. This policy concerns consensual relationships between students and members of staff. Non-consensual behaviour (or allegations of behaviour where consent has been put into doubt) is covered in the City of London's [Staff Code of Conduct](#) and [Disciplinary Procedure](#).

- 1.9. This policy is not contractual and may be amended from time to time, in light of changes in legislation or operational requirements.

## 2. Definitions

- 2.1. **Abuse of power** is where a position of power or authority is used in an unacceptable manner. This can take various forms and may include, but is not limited to, grooming, manipulation, coercion and pressurising others to engage in conduct they do not feel comfortable with.
- 2.2. **Adult at risk** is someone aged 18 years or over who may be in need of community care services by reason of mental or other disability, age or illness; and who is or may be unable to take care of themselves, or unable to protect themselves against significant harm or exploitation.
- 2.3. **Close personal relationship** excludes intimate relationships, but means a relationship where the nature, content, involvement and/or frequency of interactions and/or communications between a member of staff and a student transgress the boundaries of professional conduct or may be reasonably perceived to do so.
- 2.4. **Grooming** is when a person builds a relationship with a child, young person or an adult who is at risk so they can abuse them and manipulate them into doing things. The abuse is usually sexual or financial, but it can also include other illegal acts.
- 2.5. **Intimate relationship** is a consensual relationship characterised by emotional, physical, and/or sexual intimacy, which may be conducted in person and/or online and/or via electronic or any other form of communication. This includes brief relationships and one-off occurrences, through to marriage or life partnerships, regardless of gender, gender identity or sexual orientation.
- 2.6. **Member of staff** includes any person working within the School under a formal contract of employment (establishment staff) or as a casual worker or any person to whom the School offers any of the privileges or facilities normally available to its employees (such as visiting academics) or any individual working within the School under a contract for services and/or in a self-employed capacity (such as freelancers). Where postgraduate students work for the School in a teaching, pastoral or supervisory capacity this Policy applies to them in that capacity as members of staff.
- 2.7. **Relevant member of staff** means a member of staff who has direct or indirect academic responsibilities, or other direct professional responsibilities, in relation to that student.
- 2.8. **Responsibility for a student** is defined widely and includes any teaching, professional, pastoral or administrative responsibility or authority over a student, whether temporary or permanent, whether formally conferred on or voluntarily assumed by the staff member. This includes but is not limited to lecturing, teaching classes or seminars, overseeing projects, supervising, and setting and/or marking of examinations or other assessments of any type. It also includes acting as a mentor or advisor.

- 2.9. For the purposes of this Policy, **Sexual Misconduct** means any unwanted or attempted unwanted conduct of a sexual nature and includes but is not limited to:
- 2.9.1. sexual harassment as defined by section 26(2) of the Equality Act 2010;
  - 2.9.2. assault as defined by the Sexual Offences Act 2003;
  - 2.9.3. rape as defined by the Sexual Offences Act 2003.
- 2.10. **Student** includes any person currently studying for an undergraduate or postgraduate qualification at the School, including visiting and exchange students, applicants, and offer-holders. It covers all students who are registered for a course even if their status is suspended but does not include former students who have finished their courses, unless they are current applicants or offer holders for another course within the School.

### 3. Aim of this Policy

- 3.1. This Policy seeks to protect students and members of staff from misconduct and allegations of actual or perceived conflicts of interest by providing a framework of guidance and regulations and by ensuring appropriate safety measures and processes are in place to prevent abuses of power and sexual misconduct.
- 3.2. This Policy aims to prevent **intentional or unintentional conflict of interest or abuses of power** that may occur within seemingly consensual relationship between students and Relevant members of staff. Students could potentially experience the negative effects of an inherent power imbalance, even where a Relevant member of staff does not seek to abuse their power. For example, a student may feel pressured to commence an intimate or close relationship with a Relevant member of staff, take such a relationship further than they might otherwise wish or not feel able to end such a relationship, due to fear that doing so may result in detriment to their academic or professional career.

### 4. Who is this Policy for?

- 4.1. This Policy applies to **all members of School staff** as defined in Section 5. Please note that this includes freelancers and contractors who meet the definition of *Relevant member of staff* as defined in Section 5.
- 4.2. This Policy does not apply to students. However, students should be made aware of this Policy and the terms and requirements placed on members of staff in line with this Policy.

### 5. Roles and responsibilities

- 5.1. All members of staff (as defined in section 5) must act in accordance with this Policy.
- 5.2. Staff responsible for HR in their area (such as line managers) are responsible for providing advice and support in accordance with this Policy.

- 5.3. HR Business Partners are responsible for providing advice and support to managers and other staff about this Policy.
- 5.4. Heads of Department or equivalent are responsible for ensuring that members of staff within their departments, plus any external or student members of their local committees are made aware of this Policy; ensuring that up-to-date records of conflicts of interest are maintained.

## **6. Policy terms and disclosures**

- 6.1. With effect from the commencement date of this Policy:
  - 6.1.1. Relevant staff members are prohibited from pursuing or entering into an intimate relationship with any student. Failure to comply with this Policy will be considered as a disciplinary matter.
  - 6.1.2. Relevant staff members are also prohibited from have any close personal relationships with any student (Please see Section 7 for further information on close personal relationships). Failure to comply with this Policy will be considered as a disciplinary matter.
- 6.2. With effect from the commencement date of this Policy Relevant staff members must not take on or assume a professional responsibility for a student:
  - 6.2.1. With whom they are in an existing intimate relationship or with whom they previously had such a relationship;
  - 6.2.2. With whom they are in any close personal relationship or with whom they previously had such a relationship without first declaring this to their HR Business Partner, to enable them to assess the risk of conflicts of interest and put appropriate measures in place as necessary.
- 6.3. If at the Policy commencement date, a Relevant staff member:
  - 6.3.1. is already in an intimate or any close personal relationship with any student;
  - 6.3.2. or has previously been in an intimate or any close personal relationship with any student then they should declare that relationship to their HR Business Partner by 31 October 2025, even if the relevant responsibility for the student has ended.
- 6.4. If a member of staff is in an intimate or any close personal relationship with a student for whom they do not currently have any direct or indirect academic responsibilities, or other direct professional responsibilities the relationship should still be disclosed in writing to the relevant HR Business Partner to assess the risk of any conflict of interest arising and put appropriate alternative and/or protective measures in place as necessary.
- 6.5. If it is found this Policy is breached unintentionally, for example where a member of staff is unaware that the other party is a student, and had no reasonable basis to suspect it, the member of staff should inform their HR Business Partner as soon as they become aware of the situation. If a member

of staff is unsure whether a relationship with a student should be disclosed under this Policy, the member of staff should still disclose it in writing.

- 6.6. For any avoidance of doubt, declarations of pre-existing relationships between staff and students under this Policy should be made in writing to Human Resources.

## **7. Close personal relationships**

- 7.1. The School does not seek to discourage positive relationships between staff and students, and it may be appropriate for staff and students for whom they have responsibility to jointly participate in informal, social or leisure activities, providing careful consideration is given to potential conflicts, professional norms and boundaries and to how any such behaviour might be perceived.
- 7.2. Staff must be mindful of professional boundaries in all relationships with students and must act in a way which safeguards student welfare and ensures standards of academic integrity are upheld. Even where a staff member does not have and is not likely to have responsibility for a student, staff should be very aware of and consider the potential for an actual or perceived imbalance of power or authority, accusations of bias or exploitation, and questions about the nature of consent, before embarking on an intimate or close personal relationship with a student. The risks of such are likely to be heightened where there is a significant age difference between the staff member and the student; the student is an undergraduate; and/or the student is more vulnerable for any reason.
- 7.3. It is impossible to cover every potential situation which might involve, or be perceived to involve, transgression of the boundaries of professional conduct but any relationship which involves (or is perceived to involve) any of the following characteristics will be considered to do so and is prohibited under this policy.
- 7.3.1. any form of dependence, whether emotional, practical, financial or otherwise, and whether the student appears dependent on the member of staff; or
- 7.3.2. favouritism towards any student (which might include, for example, circumstances where a student is treated in a way that is exclusive or exceptional).
- 7.4. Staff members should be mindful of instances where it may be considered that professional boundaries are crossed, such as sharing their personal number with students and messaging about non work or non-academic related issues; sharing details around personal lives or asking students to share such details; adding students on social media (outside professional networks such as LinkedIn); or getting drunk with students. Please note that this is a non-exhaustive list.
- 7.5. If there is any uncertainty whether a relationship with a student falls under the close personal relationship definition, advice should be sought from HR as soon as possible.

## **8. Relationships with students under the age of 18 or Adults at Risk**

- 8.1. Members of staff who have responsibility for any students must never enter into an intimate relationship with a student or any other person under eighteen years of age or with a student who is an adult at risk, irrespective of whether the member of staff has any responsibility for the student or other person.
- 8.2. Staff are reminded that intimate relationships involving students (including applicants or offer-holders) under the age of eighteen where the staff member is in a position of trust or where the student is an adult at risk could fall within the scope of the Sexual Offences Act 2003.
- 8.3. Anyone suspecting a member of staff of acting inappropriately towards a student or any other person under the age of 18 or an adult at risk should refer to the [School's Safeguarding Policy](#) and contact the Head of Safeguarding, who may contact the local authority designated officer and/or the Police.

## **9. Admissions and recruitment**

- 9.1. If an intimate or close personal relationship is pre-existing between any member of staff who has a role in selection of candidates for admission to the School and a candidate seeking admission, that member of staff must inform their Head of Department or equivalent and the relevant HR Business Partner at the outset of the admissions exercise so steps can be taken to avoid any conflict of interest. The matter will, as far as possible, be handled in a way that respects confidentiality to ensure there is no detriment to the candidate.

## **10. Advice to students**

- 10.1. Students should be aware of this Policy and the requirements placed on members of staff. Rules and expectations of behaviour for students are set out in the [Student Code of Conduct and Disciplinary Procedure](#) (Academic Regulation 5A).
- 10.2. If an intimate or close personal relationship has developed contrary to this Policy, even if it predates the Policy commencement date, and/or the student is not sure that the member of staff has disclosed it, they are encouraged to advise their Head of Department or equivalent, a Personal tutor or any other senior member of the School whom they feel able to approach. However, there will be no disciplinary consequences for the student if they do not do so.
- 10.3. The member of staff to whom the disclosure was made will be responsible for reporting the matter to their HR Business Partner to ensure that the appropriate action is taken.
- 10.4. Students should particularly note the guidance and support available in any cases of non-consensual behaviour at section 11, and further sources of support at section 15. Regardless of whether a relationship has been disclosed, students are encouraged to seek support if they experience any inappropriate or non-consensual behaviour from a member of staff during that relationship.

- 10.5. Student behaviour/s towards members of staff that could be interpreted as flirtatious or making advances towards a personal, particularly intimate relationship should, except for trivial cases, be reported by the member of staff to the HR Business Partner. In this event, following consideration and if appropriate, discussion with the Student Experience Team, a record will be kept and measures may be put in place to separate and protect the parties or minimise the possibility of conflicts of interest, concerns or complaints over academic integrity or professional behaviour.
- 10.6. Inappropriate behaviour by a student towards a member of staff or another student that amounts to sexual misconduct, physical misconduct or abusive behaviour, or otherwise breaches the Student Code of Conduct, may lead to action being taken under the [Student Disciplinary procedure](#).
- 10.7. Students engaged in a School led arrangement with an external organisation must adhere to policies on personal relationships between members of staff and students within that organisation. However, if no Policy exists, the clauses in this section will apply.

## **11. Non-consensual behaviour**

- 11.1. If a student experiences inappropriate behaviour in breach of this Policy, is involved in a relationship that they do not consider to be consensual, or if they consider that they have been adversely affected by a misuse of power, authority, or conflict of interest, they should make a report through [Report + Support](#) or raise a complaint through the [Student Complaints procedure](#) (Academic Regulation 5D).
- 11.2. Support and advice can be accessed from Student Services, the Sexual Violence Prevention and Response Manager or from the Head of Safeguarding, if it concerns a child or adult at risk. Students can also access external advice and are encouraged to access the support information on the [Report + Support pages](#).
- 11.3. Staff who experience inappropriate behaviour from and/or have a complaint against a student should do so by submitting a report with contact details form via [Report + Support](#). Alternatively, staff members can also contact their HR Business Partner who will liaise with the Student Experience Team to agree appropriate steps.
- 11.4. Staff are also encouraged to access the support information on the [Report + Support page](#).
- 11.5. Where reports of non-consensual behaviour are made by either students against members of staff or staff against students, preventative measures may be put in place to separate and protect the affected parties.

## **12. Confidentiality**

- 12.1. Concerns raised under this Policy should be treated in confidence as far as that is reasonably possible and consistent with safeguarding the welfare of students.
- 12.2. Information about an intimate or close personal relationship between a member of staff and a student may be placed on the member of staff's



personnel file. Communications regarding measures put in place as a result of this Policy should, as far as possible, be neutral, limited to essential facts, and without details published of the situation that gave rise to them. Records will be treated as confidential and be kept no longer than necessary in accordance with relevant retention policies.

### **13. Malicious or vexatious complaints**

- 13.1. A malicious complaint is one that is made with the intention to intimidate, to lower the reputation of, or otherwise injure or harm a person, through knowingly providing false or misleading information or withholding information about an incident or issue. A vexatious complaint is either one that is made with the sole or main intention to harass, annoy or subdue somebody, or one that is unreasonable, without foundation, frivolous, repetitive, deliberately burdensome or unwarranted.
- 13.2. If it is found that a person has made a complaint that is malicious or vexatious, the School may instigate a disciplinary process against them. Disciplinary action will not be taken, however, if the matter is mistaken or otherwise ill-founded but not malicious or vexatious.

### **14. Failure to comply with this policy**

- 14.1. After the adoption of the Policy, Relevant staff members should not pursue or commence an intimate relationship with a student. Should this occur, this will be a breach of the policy and the School will consider this through the [City of London's Staff Disciplinary Procedure](#).
- 14.2. Failure on the part of a Relevant staff member to declare an existing intimate or close personal relationship with a student will be a breach of the policy and the School will consider this through the [City of London's Staff Disciplinary Procedure](#).

### **15. Further Support available**

- 15.1. The School is committed to ensuring the welfare of and providing support for its staff and students. The following support resources are available.
- 15.2. Help for any member of staff or student who has been subjected to sexual misconduct, including sexual assault or rape, is available through the School's [Report + Support](#) webpage. This includes details of services provided by both the School and external specialist organisations.
- 15.3. Support for staff is available through the Employee Assistance Programme and via your HR Business Partner. Members of staff can also access support through their line manager.
- 15.4. Talking confidentially to one of the members of the DEI team may also be helpful, particularly if the inappropriate behaviour is perceived to be harassment or discrimination due to a protected characteristic.
- 15.5. Support for students is detailed on the [Report + Support pages](#) and includes Student Services, the Student Experience Team within Registry and the Head of Safeguarding.