

Personal Relationships Policy and Procedure

Index

<u>1.</u>	<u>Introduction</u>	<u>3</u>
<u>2.</u>	<u>Scope</u>	<u>3</u>
<u>3.</u>	<u>Personal relationships between staff and students</u>	<u>4</u>
<u>4.</u>	<u>Guidance for Staff - Maintaining Boundaries</u>	<u>4</u>
<u>5.</u>	<u>Personal relationships between staff and between staff and third parties</u>	<u>5</u>
<u>6.</u>	<u>Personal relationships between line manager and direct report</u>	<u>5</u>
<u>7.</u>	<u>Job applicants in a personal relationship with an Institute staff member, non-executive director, or student</u>	<u>6</u>
<u>8.</u>	<u>What is a conflict of interest?</u>	<u>6</u>
<u>9.</u>	<u>How to declare a conflict of interest</u>	<u>6</u>
<u>10.</u>	<u>End of personal relationship</u>	<u>7</u>
<u>11.</u>	<u>Conduct at work</u>	<u>7</u>
<u>12.</u>	<u>Complaints</u>	<u>7</u>
<u>13.</u>	<u>Support and resources</u>	<u>8</u>
<u>14.</u>	<u>Related policies and procedures</u>	<u>8</u>
<u>15.</u>	<u>Appendix A</u>	<u>9</u>
	Personal Relationships Declaration Form	9
	<u>Staff and Student (Existing or Past Personal Relationship)</u>	<u>10</u>
	<u>Conflict of Interest</u>	<u>11</u>
	<u>Line Manager and Direct Report (Existing or Past Personal Relationship)</u>	<u>11</u>
	<u>End of a personal relationship</u>	<u>13</u>

Document Version Control

Document Version	Committee	Committee Action	Date
	SMT	Recommended approval	7 June 2023
	Board of Directors	Approved	25 September 2023
		Date in force	25 September 2023
v1.0	SMT	Recommended Approval	10 January 2024
	Board of Directors	Approved	22 January 2024
		Date in force	24 January 2024
v2.0	SMT	Recommended approval	7 May 2025
	Board of Directors	Approved	28 July 2025
		Date in force	1 August 2025

The Personal Relationships Policy and Procedure will be reviewed annually by the Document Lead. Any significant changes beyond the scope of an annual review will require the approval of the Board of Directors acting on recommendation from the Senior Management Team.

1. Introduction

- 1.1 Bloomsbury Institute is committed to fostering an inclusive culture and a working environment based on dignity, trust, and respect, where all are treated fairly.
- 1.2 This policy aims to strike a balance between the rights of staff to a private life, and Bloomsbury Institute's need to protect its business interests, while ensuring the safety and wellbeing of all students and staff.
- 1.3 The purpose of this policy is to ensure processes are in place to safeguard students and staff from abuses of power, harassment and sexual misconduct. Additionally, the policy aims to protect staff from allegations of actual or perceived conflicts of interest that may arise from personal relationships.
- 1.4 It is recognised and accepted that within Bloomsbury Institute, it is possible that some staff could be related to one another, and some may develop personal relationships with each other and with third parties.
- 1.5 For this policy a personal relationship is defined as any one of the following, however this list is neither exhaustive nor exclusive:
 - using the Office for Students definition within its E6 Regulatory guidance for an intimate personal relationship between a relevant member of staff and a student: *an intimate personal relationship where a relationship involves one or more of the following elements: a:) physical intimacy including isolated or repeated sexual activity; or b:) romantic or emotional intimacy, or*
 - an emotional or romantic relationship which goes beyond the normally accepted boundaries of the professional sphere between parties. For example, where the parties consider that they are "seeing each other" or "going out together", or
 - a relationship with a family member, through marriage or co-habitation or close family friend, or
 - a social or extra-curricular relationship (particularly where one party could be in a position to influence a work or study-related outcome for the other). This refers to relationships that involve close friendships and frequent engagement in activities unrelated to the workplace or study, or
 - a relationship where there is financial dependence, or
 - a close business, financial or commercial relationship.

2. Scope

- 2.1 This policy and its procedures apply to all Bloomsbury Institute staff which include its employees, hourly paid lecturers or workers, agency workers, self-employed contractors, staff on fixed-term contracts and students who are also employees or workers.

This policy sets out the responsibilities and expectations of Bloomsbury Institute's staff regarding personal relationships:

- between staff and students
- between staff
- between staff and third parties (a third party is a contractor, client, supplier, or provider of services to Bloomsbury Institute)
- between a line manager and their direct report

- between a job applicant and an Institute staff member or non-executive director
- between a job applicant and a student at Bloomsbury Institute.

3. Personal relationships between staff and students

- 3.1 Bloomsbury Institute staff are not permitted to begin or maintain a personal relationship with any student studying with us.
- 3.2 Any staff member found to be in breach of this policy will be subject to disciplinary action under Bloomsbury Institute's [Staff Disciplinary Procedure](#)¹.
- 3.3 If a personal relationship exists between a staff member and a student who is due to join Bloomsbury Institute (or vice versa, where a new member of staff is due to start employment and has an existing personal relationship with a student), the staff member is responsible for declaring the relationship without delay, regardless of the circumstances.
- 3.4 If a personal relationship has existed in the past between a staff member and a student which has ended but the student is due to join Bloomsbury Institute, the staff member, should they be aware of the incoming student, is responsible for declaring the relationship without delay, regardless of the circumstances.
- 3.5 Personal relationships under 3.3 and 3.4 must be declared by the staff member by submission of the declaration form (located at Appendix A and on the Staff Intranet) to the Head of People and Development (antony.charles@bil.ac.uk). The Head of People and Development will ensure the relationship is risk assessed so that conflicts of interest can be managed appropriately, for example, regarding student assessments. The declaration form will be stored confidentially on the employee's file and all information declared in these circumstances will be treated respectfully and sensitively.
- 3.6 Following the risk assessment of the personal relationship, the Head of People and Development will ensure that any required arrangements are co-ordinated, communicated and actioned.
- 3.7 If Bloomsbury Institute becomes aware that a staff member has an existing personal relationship with a student which is not declared, the matter will be investigated under Bloomsbury Institute's Staff Disciplinary Procedure.
- 3.8 If there is a previous or existing personal relationship between a job applicant applying to work at Bloomsbury Institute and a current student, the applicant is required to declare this to the Head of People and Development during the application process (see also 7. *Job Applicants in a personal relationship with an Institute staff member, non-executive director, or student in this policy*).

4. Guidance for Staff - Maintaining Boundaries

- 4.1 All staff are responsible for maintaining clear boundaries and upholding ethical standards in all their interactions with students. Our policies on [Harassment and Sexual Misconduct, Ethics, and Dignity and Respect](#)² can be referenced for further information.
- 4.2 Staff in a teaching or supervisory position must uphold their duty of care and responsibilities for safeguarding student welfare, by ensuring that their behaviour and conduct is professional, and boundaries are always maintained.
- 4.3 Staff should always respect a student's personal space.

¹ <https://lsbm.breathehr.com>

² <https://lsbm.breathehr.com>

- 4.4 Staff should ensure that all their communications with students are professional and in line with Bloomsbury Institute's [Internet Acceptable Use and Email Acceptable Use Policies](#)³.
- 4.5 Where a one-to-one discussion with a student is required e.g. supervision, the staff member should ensure this takes place in a safe and neutral space, normally on Bloomsbury Institute's premises or within its teaching facilities.
- 4.6 If a member of staff is concerned that a student is presenting with behaviour towards them that they perceive as inappropriate for the student/staff relationship (for example aggressive, flirtatious or intimidating), they should raise this with their line manager immediately. Alternatively, they can confidentially contact the Head of People and Development.
- 4.7 Staff and students can also use Bloomsbury Institute's online platform [Report and Support Services](#)⁴ to disclose any form of inappropriate behaviour. Further details can be found under 12. *Complaints* and 13. *Support and Resources* in this policy.

5. Personal relationships between staff and between staff and third parties

- 5.1 Bloomsbury Institute fosters a culture of openness and while staff are not required to declare their personal relationship at work, they are encouraged to do so by contacting their line manager or the Head of People and Development. This is because a declaration fosters transparency, mitigates against any associated risks in not making a disclosure, and avoids potential perceptions of bias. However, if a situation arises from a personal relationship which gives rise to a real or perceived conflict of interest at work, the staff member is responsible for declaring the conflict of interest to Bloomsbury Institute and withdrawing from a process or decision, or from undertaking a certain role. They should declare the conflict of interest immediately using the declaration form and submit this to the Head of People and Development. See also 8. *What is a Conflict of Interest* and 9. *How to Declare a Conflict of Interest*.
- 5.2 If Bloomsbury Institute becomes aware that a staff member has not declared a real or perceived conflict of interest, the matter may be investigated under Bloomsbury Institute's Staff Disciplinary Procedure. Staff should also refer to the Financial Regulations⁵ which may have relevance.

6. Personal relationships between line manager and direct report

- 6.1 Notwithstanding clause 5 of this policy, if a relationship develops between a line manager and their direct report, or a family relationship exists between a line manager and direct report, the line manager must declare the relationship and both line manager and direct report must complete the declaration form (located at Appendix A and on the Staff Intranet) and submit this to the Head of People and Development. The form will be stored confidentially on the employee's file and all information declared in these circumstances will be treated respectfully and sensitively.
- 6.2 The line manager will be informed that continuing line management of the individual whilst in a relationship with them will not be permitted by Bloomsbury Institute.
- 6.3 If the situation arises where a staff member becomes the line manager for a direct report with whom they have had a personal relationship in the past, even if that relationship has ended, the line manager must declare this to the Head of People and Development, who will assess

³ <https://lsbm.breathehr.com>

⁴ <https://www.bil.ac.uk/support/>

⁵ the Financial Regulations are available upon request from the Finance team.

the situation for any potential conflict of interest. The staff member must also complete the declaration form (located at Appendix A and on the Staff Intranet) and share this with the Head of People and Development. It will be stored confidentially on the employee's file and all information declared in these circumstances will be treated respectfully and sensitively.

7. Job applicants in a personal relationship with an Institute staff member, non-executive director, or student

- 7.1 A job applicant applying for any position at Bloomsbury Institute is required to declare, to the Head of People and Development, during the application process the details of any previous or existing personal relationships they have with current Institute staff members, non-executive directors, or students.
- 7.2 If a job applicant is selected for interview and they have declared a personal relationship with a named member of Institute staff who is involved in the recruitment and selection of the role they applied for, the Head of People and Development will ensure that the staff member named on the application is withdrawn from the recruitment and selection process.
- 7.3 The staff member or non-executive director named on the application will not be permitted to line manage a member of staff with whom they are in a personal relationship. Equally the applicant will not be permitted to line manage a member of staff with whom they are in a personal relationship. The Head of People and Development should refer to 6. *Personal relationships between line manager and direct report* in this policy.

8. What is a conflict of interest?

- 8.1 A conflict of interest is when a staff member's judgement, decisions or actions at work are, or could be, compromised by their personal relationship with another staff member or third party. Despite every effort of individuals in a personal relationship to maintain professional boundaries and remain unbiased, the potential for conflict between personal or family loyalty and work responsibilities may arise.
- 8.2 Where a member of staff becomes aware that a situation arising from their personal relationship may give rise to a real or perceived conflict of interest in the workplace, they must take immediate action to declare the conflict (See 9. *How to declare a conflict of interest*).
- 8.3 If a member of staff is unsure whether a situation arising from their relationship presents a conflict of interest, they are encouraged to seek advice confidentially from their line manager or alternatively the Head of People and Development. Staff should also refer to the Financial Regulations⁶ which may indicate a conflict.
- 8.4 To avoid a conflict of interest within recruitment, hiring managers should declare the conflict and withdraw from any conversation, process or decision related to the role or individual concerned. This includes, but is not limited to, job evaluation, candidate selection and interviewing, academic promotions, and any other reward related decisions, and tendering or procurement processes. See also 9. *How to Declare a Conflict of Interest*.
- 8.5 If a staff member is approached to participate as a witness, investigating officer or chair of a formal employee relations procedure, which involves a staff member with whom they have a personal relationship, they should declare they have a conflict of interest.

9. How to declare a conflict of interest

- 9.1 As soon as a staff member becomes aware that a situation may give rise to a real or perceived conflict of interest, they must declare the conflict and withdraw from the relevant conversation,

⁶ the Financial Regulations are available upon request from the Finance team.

process, or decision. The conflict should be declared in the first instance to their line manager or to the Head of People and Development.

- 9.2 The staff member must complete the declaration form (located at Appendix A and on the Staff Intranet) and submit this to the Head of People and Development. All information declared will be treated respectfully and sensitively and stored confidentially on the employee file.
- 9.3 The Head of People and Development will ensure that the information declared is risk assessed by the line manager or individual relevant to the situation for any potential impact on the staff member's work commitments and duties and they will work collaboratively with the staff member to make alternative arrangements where necessary.

10. End of personal relationship

- 10.1 A staff member who has previously disclosed a personal relationship must also disclose the end of that relationship. The relevant part of the declaration form (Appendix A) should be completed and submitted to the Head of People and Development.

11. Conduct at work

- 11.1 Regardless of whether there is a conflict of interest, if a staff member is involved in a personal relationship with another staff member or third party, they must not allow that relationship to influence their conduct at work.
- 11.2 Staff members are expected to conduct themselves in an appropriate, professional, and responsible manner at work and ensure that personal relationships do not compromise these behaviours and values or have an adverse effect on their work.
- 11.3 Intimate behaviour between members of staff during work time, such as holding hands, kissing, other close physical contact and discussions of a sexual nature will not be tolerated and will be dealt with under Bloomsbury Institute's Staff Disciplinary Procedure.
- 11.4 Confidential Institute information must be always protected and treated in accordance with our [Data Protection and Confidentiality Policy](#)⁷. Any breach of confidentiality will be treated very seriously, even if the disclosure was inadvertent, and dealt with under our Staff Disciplinary Procedure.

12. Complaints

- 12.1 Bloomsbury Institute is committed to promoting a working environment based on dignity, trust, and respect, free from discrimination, bullying, harassment, or victimisation.
- 12.2 If a member of staff feels they are being treated wrongly because of their personal relationship, they are encouraged to raise it with their line manager if they feel able to, or to contact the Head of People and Development confidentially. Alternatively, they may wish to raise a complaint under Bloomsbury Institute's [Student Harassment and Sexual Misconduct Policy](#)⁸.
- 12.3 Staff and students can also use Bloomsbury Institute's online platform to report an incidence of harassment, including bullying, discrimination, hate crime, and/or sexual misconduct. Any staff member or student can choose to report anonymously or not via the online platform. or they can speak to a member of staff. The Report and Support Service can be accessed either on Bloomsbury Institute Staff Intranet or by clicking [here](#)⁹.

⁷ <https://www.bil.ac.uk/qem/section-3/>

⁸ <https://www.bil.ac.uk/qem/section-3/>

⁹ <https://www.bil.ac.uk/support/>

13. Support and resources

Report and Support Services	Report and Support Services can be accessed via our Single Source of Information or directly from here .
Employee Assistance Programme (EAP)	Bloomsbury Institute provides a free and confidential Employee Assistance Programme (EAP), which is available to staff. Further information can be found here .
Refuge	National Domestic Abuse Helpline (Freephone, 24 hour) - 0808 2000 247 The helpline is run by Refuge and a live online chat is also available
Women's Aid	Women's Aid is the national charity working to end domestic abuse against women and children. They provide local support services, training for organisations and information if you are worried about someone else . They also have a live chat facility.
Rape Crisis	Rape Crisis have a network of independent Rape Crisis centres that provide specialist support and services for victims and survivors of sexual violence. They have a National Rape Crisis Helpline - 0808 802 9999 and a live chat .
Respect - Men's Advice Line	Help for male victims of domestic abuse. https://mensadviceline.org.uk/getting-support/ Freephone 0808 8010327

14. Related policies and procedures

- Student Disciplinary Policy and Procedures
- Student Complaints Policy and Procedures
- Staff Disciplinary Procedure
- Staff Grievance Procedures
- Student Harassment and Sexual Misconduct Policy
- Safeguarding Policy
- Ethics Policy
- Dignity and Respect Policy
- Data Protection and Confidentiality Policy
- Financial Regulations
- Email Acceptable Use Policy
- Internet Acceptable Use Policy
- Records Management Policy

15. Appendix A

Appendix A (declaration form)

Personal Relationships Declaration Form

Confidential

This form should be completed in accordance with the Personal Relationships Policy and Procedure.

Name of the staff member completing this form:

Please tick the appropriate box then complete the relevant form below

☐

1. Staff and Student (Existing or Past Personal Relationship)

☐

2. Conflict of Interest

☐

3. Line Manager and Direct Report (Existing or Past Personal Relationship)

PLEASE NOTE: For the purposes of this policy a personal relationship is defined as any one of the following, however, this list is neither exhaustive nor exclusive:

- using the Office for Students definition within its E6 Regulatory guidance for an intimate personal relationship between a relevant member of staff and a student: *an intimate personal relationship where a relationship involves one or more of the following elements: a:) physical intimacy including isolated or repeated sexual activity; or b:) romantic or emotional intimacy, or*
- an emotional or romantic relationship which goes beyond the normally accepted boundaries of the professional sphere between parties. For example, where the parties consider that they are "seeing each other" or "going out together", or
- a relationship with a family member, through marriage or co-habitation or close family friend, or
- a social or extra-curricular relationship (particularly where one party could be in a position to influence a work or study-related outcome for the other). This refers to relationships that involve close friendships and frequent engagement in activities unrelated to the workplace or study, or
- a relationship where there is financial dependence, or
- a close business, financial or commercial relationship.

Staff and Student (Existing or Past Personal Relationship)

Part A: To be completed by the staff member who has an existing or past relationship with a student who is joining Bloomsbury Institute.

This form should be returned to the Head of People and Development who will ensure a risk assessment is undertaken. The form will be stored confidentially on their personnel file.

Staff Member Details	
Job Title	
Division/ Department	
Staff Member's Line Manager	
Student Details	
Student's Name	
Course name	
Start date	
Nature of the Relationship	
<i>Please describe the nature of the relationship, noting the definitions of a personal relationship at the beginning of this form and as described at 1.6 in the Personal Relationships Policy and Procedure.</i>	
Nature of the Relationship	
Existing or Past Relationship?	
Date of Declaration	

Part B: To be completed by the Head of People and Development.

Risk Assessment of the Staff /Student Relationship	
Name	
Outcome	
Is the declared relationship deemed acceptable?	Yes/No (delete as applicable)
If no, briefly explain why, how this has been communicated to the staff member and any permanent or temporary adjustments that have been made to remove any conflict of interest arising from the relationship e.g. will the staff member be redeployed.	
If the relationship is deemed acceptable, briefly explain why and how any risk will be mitigated.	
Tick this box to confirm the decision has been communicated to the staff member <input type="checkbox"/>	

Conflict of Interest

Part A: To be completed by the staff member declaring a real or perceived conflict of interest arising from their personal relationship with another staff member or a third party.

This form should be returned confidentially to the Head of People and Development.

Staff Member Details	
Staff Member's Name	
Job Title	
Division/Department	
Staff Member's Line Manager	
Conflict of Interest	
Please briefly describe the real or perceived conflict of interest arising from your personal relationship. Note that you are not required to declare details of the relationship, however you must declare the conflict of interest.	
Date of Declaration	

Part B: To be completed by the Head of People and Development.

Risk Assessment of the Conflict of Interest - outcome
Outcome
Briefly describe how the conflict of interest has been risk assessed, and any identified impact on the staff member's work commitments or duties arising from the situation. Please confirm any permanent or temporary adjustments that have been made and how the outcome has been communicated to the staff member.
Tick this box to confirm the decision has been communicated to the staff member:
<input type="checkbox"/>

Line Manager and Direct Report (Existing or Past Personal Relationship)

Part A: To be completed by the line manager who has an existing or past personal relationship with a member of staff who is reporting directly to them and returned to the Head of People and Development.

Line Manager's Details	
Name	
Job Title	
Division/Department	
Line Manager's Manager	
Direct Report Details	
Name	
Job Title	
Division/Department	
Nature of the Relationship	
Please describe the nature of the relationship, noting the definitions of a personal relationship at the beginning of this form and as described at 1.6 in the Personal Relationships Policy and Procedure.	
Nature of the Relationship	
Date of Declaration	

Part B: To be completed by the Head of People and Development

End of a personal relationship

Part A: To be completed by the relevant staff member and returned to the Head of People and Development.

Staff Member Details	
Staff Member's Name	
Job Title	
Division/Department	
Staff Member's Line Manager	
Please state below the relationship that has ended, when this occurred and any other relevant information.	

Part B: To be completed by the Head of People and Development.

<p><i>When the relationship is no longer relevant or where it is determined that it ceases to exist, both the original Personal Relationships Declaration Form and the form disclosing an end of relationship will continue to be held on the employee's personal HR file (or service agreement if not an employee) which is normally retained for 6 years after employment or service ends. Bloomsbury Institute's Records Management Policy¹⁰ provides a Retention Schedule and includes retention information relating to HR records.</i></p>
<p>Following submission of the form, the Head of People and Development will ensure that appropriate checks and or discussion occur in order for Bloomsbury Institute to be satisfied that the relationship is no longer relevant or has ceased to exist. Provide a summary of action taken below.</p>
<p>Tick this box to confirm that the relationship is no longer relevant or has ceased to exist <input type="checkbox"/></p> <p>Or, where it is deemed that there remains to be a relationship in place or could be perceived to be, tick this box <input type="checkbox"/> and provide details below.</p>
<p>Tick box to confirm you have informed the staff member that it is considered the relationship still exists or could be perceived to be: <input type="checkbox"/></p>

¹⁰ <https://www.bil.ac.uk/qem/section-3/>