



## **PERSONAL RELATIONSHIPS AT WORK POLICY**

### **1. Introduction**

The University is committed to maintaining a safe environment for all students and employees. We are also committed to ensuring that decisions are made free of bias and conflict of interest. Some personal relationships can give rise to an actual or perceived breach of those principles, which can have a negative impact on the University and the individuals concerned.

In order that University business is conducted in a professional manner, it is necessary to distinguish between personal and professional relationships. Emphasis is placed on the responsibility of employees not to abuse power and trust in employee/student relationships.

Compliance with this policy will protect both employees and students and ensure the continued quality of the learning process.

### **2. Purpose**

To provide a clear principle on where relationships with fellow employees and or students should be declared.

Provide details on the expectations of behaviour to minimise any potential conflict of interest, helping to ensure that employees are not subject to criticism of bullying, harassment, coercion, abuse of authority, discrimination, conflict of interest or favouritism.

Prevent unfair advantage or disadvantage to students, employees or other individuals resulting from close personal relationships.

To ensure compliance with Office for Student guidance in relation to E6 Condition of Registration – Harassment and Sexual Misconduct.

### **3. Scope**

The university recognises that socialising on a friendship basis between employees and students is a positive aspect of being an active member of the university community, however the nature of employees/students and employees/employees relationships imposes responsibilities and duties on those employees.

This policy sets out the expectations and obligations of employees with respect to personal relationships between employees/students and between employees/employees, and is intended to ensure that appropriate processes are in place to prevent abuses of power and allegations of actual or perceived conflicts of interest.

This policy **prohibits the forming of** intimate relationships between employees and students.

There must be a declaration of the following relationships (definitions of relationships can be found in section 5):

- Where an intimate relationship exists between a employees and student.
- Where a close relationship exists between an employee and student with direct supervision.
- Where a close personal or intimate relationship exists between employees where the relationship may give rise to real or perceived conflict of interest, breach of trust or confidentiality.

#### **4. University Inclusion Statement**

The University of Cumbria is committed to providing an inclusive environment, where employees, students and visitors are encouraged to be their true self, in order to enhance the individual and collective experience. As a university community, we share the social responsibility of enabling this inclusive environment by valuing, respecting and celebrating difference, to ensure that we generate a sense of understanding and belonging.

The university recognises that our differences are our strength, seeking and valuing different perspectives and ideas, in an environment that is without prejudice and bias.

We are committed to embracing our responsibility as a facilitator of change and continue to develop our equality agenda in line with and, where appropriate, beyond the Equality Act 2010. We do not tolerate discrimination, bullying or harassment in any form on the grounds of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, religion or belief, sex or sexual orientation.

(Approved by University Board May 2021).

#### **5. Policy Principles**

##### **5.1 Definitions**

For the purposes of this policy, the following terms shall have the following meaning:

- **Close personal relationship:** Relative or close family friend, or a relationship where there is financial dependence. This covers personal relationships which extend beyond usual work, study or leisure activities through which individuals may be acquainted. It therefore involves close friendships where individuals are well-acquainted, and engage frequently in activities together which are unrelated to work or study.
- **Intimate relationship:** An intimate consensual romantic or sexual relationship which goes beyond the bounds of a platonic or working relationship and could be brief.
- **Conflict of interest:** A situation where a conflict arises for an individual between two competing interests, which are often, but not exclusively, interests of public duty versus private interests. Conflicts of interest may be reasonably perceived, potential or actual. They can involve financial or non-financial interests of employees or student and the interests of a business partner or associate, family member, friend or person in, or has had a close personal relationship with employee.

- **Breach of trust:** an implied duty that neither employer nor employee will act so as to breach the duty of mutual trust and confidence that exists between them, without good reason. If the employees does breach the duty, it can entitle the employer to take action which could include disciplinary action.
- **Sexual Misconduct** - unwanted behaviour of a sexual nature that:
  - a) has the purpose, or may reasonably be considered to have the effect, of violating a person's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment for an employee/student; or
  - b) is an abuse of power over an employee/student; or
  - c) is more or less favourable treatment of someone because they have rejected or submitted to such behaviour – through any medium, including online.

Even if the behaviour is not expressly unwanted, this would still be regarded as sexual misconduct if points b) or c) apply.

- **Employee:** any person who is engaged by the university as an employee or worker or who applies to be engaged by the university as an employee or worker. This includes honorary and emeritus employees. This would also include employee from third party organisations for example Imperial College London.
- **Student:** all undergraduate and postgraduate students, full-time and part-time students, students studying on or off campus or online, whether they are currently enrolled in subjects or deferred / interrupted from their studies.
- **Adult at risk'** means someone aged 18 years or over who is, or may be, in need of community care services by reason of mental ill health 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.

## 5.2 Personal relationships between employees

Relationships between employees are not prohibited. However, some guidance is necessary where employees are brought into closer professional contact and it is important to ensure that the recruitment, selection, development, management and promotion of employees are based solely on worth, and not in any way affected by personal relationships.

Employees are reminded of possible power imbalances within intimate and close personal relationships and relationships between employees in which one has direct or indirect authority over another are strongly discouraged. Such relationships are more likely to give rise to perceived or real conflict of interest; these will need to be declared and require measures to be put in place.

In order to prevent potential abuse of power or perceived or real conflict of interest, employees must declare close personal or intimate relationships in either of the following situations:

- Where a relationship begins that may give rise to a real or perceived conflict of interest, exploitation, favouritism or bias.
- Where a relationship already exists and a new situation arises that may give rise to a real or perceived conflict of interest, exploitation, favouritism or bias.

If in doubt the best course is to declare a relationship, so that appropriate measures can be considered.

All declarations are to be made via MYHR as soon as reasonably practicable and always within two months. Where two colleagues are declaring a relationship to their respective manager via MYHR, it is expected that two separate declarations are made.

### 5.3 Personal relationships between employees and students

The University believes that the professional relationship between students and employees is vital to a student's educational development and affirms that the teaching relationship is based on trust and confidence. Students are entitled to equality of treatment, and it is important that a personal relationship between an employee and a student is not perceived by others to prejudice the equality of treatment.

Employees must ensure their interactions with students are always of a professional and appropriate nature, regardless of whether any interactions take place in or out of the workplace environment.

The University **prohibits** employees and students to enter any intimate relationship with one another as it compromises the integrity of their professional relationship. Such relationships can lead to a lack of confidence and perceived or actual conflicts of interest, which can have a detrimental effect on the teaching and learning environment for other students and colleagues.

Any intimate relationship with student under the age of 18 years or an adult at risk is likely to constitute a criminal offence under the 'abuse of trust' provisions of the Sexual Offences Act 2023.

The university **discourages** close personal relationships between employees and students where the employees has direct responsibility for, or supervisory, tutoring, teaching, pastoral care, assessment responsibility and or access to student support, including financial assistance, accommodation and other support services.

The University appreciates that in exceptional circumstances, a student may opt to take a module, attend a class, or engage in another activity organised by or delivered at the University that is offered by an employee with whom they have a close personal relationship. Whilst this is not encouraged, arrangements can be made to accommodate the request if there is a case for the student to engage in that activity or the interaction is limited and providing that, where appropriate, alternative arrangements may be made for the student's work to be marked and feedback on their performance provided. This should be discussed with the Line Manager and recorded within the MYHR system.

The University acknowledges that we may have instances where employees are also students, and we would continue to expect that declarations of personal relationships to continue, with management to avoid any conflict. If in doubt the best course is to declare a relationship, so that appropriate measures can be considered.

## **5.4 Relationships between employees and third parties**

Personal relationships between employees and third parties including clients, customers, partners (i.e. Imperial College London) contractors or suppliers must be declared where there is an actual or potential conflict of interest.

## **6. Roles and Responsibilities**

In order to support the implementation of this policy, it is the responsibility of:

### **Employees**

- To ensure they are conducting themselves professionally and appropriately in line with University Values;
- To ensure they have an understanding and awareness of the policy and if not seek clarification at the earliest opportunity;
- To comply with the policy where appropriate to declare relationships in line with policy requirements;
- To raise concerns about problematic or potentially problematic relationships with their line manager (or other appropriate manager).

### **Managers**

- To ensure employees are aware and understand this policy;
- To comply with the policy themselves;
- To deal with relationship issues sensitively and confidentially;
- As a duty of care, act on concerns raised by employees
- To ensure declarations are reviewed on MYHR and any subsequent actions discussed/agreed etc

### **People & Culture Team**

- To ensure that the policy is readily available and understood such that employees are aware of the standards of professional relationships;
- To provide guidance to managers and employees
- To review and monitor the operation and effectiveness of the policy;
- Provide objective assistance and support to ensure university-wide consistency

## **7. Related Policies and Procedures**

- Prevention of Bullying, Harassment & Sexual Misconduct Policy
- Code of Conduct
- Grievance Policy
- Disciplinary Policy
- Public Interest Disclosure Policy

## **8. Publication, Implementation & Review**

The policy and procedure will be stored in the policy hub:

<https://unicumbriaac.sharepoint.com/sites/VCO/Lists/PolicyMasterList/Public.aspx> and the People and Culture mini site.

Also linked to the Healthy Relationships Hub here: [Healthy Relationships Hub | MyCumbria](#)

## 8. Appendices

Appendix 1 – Procedural Guidelines

Appendix 2 - Examples of when a conflict of interest

Appendix 3 - Steps to be taken following a disclosure of a personal relationship

## 9. Document Control Information

*[The table below should be completed by the document owner and included within every University Policy Document.]*

<b>Document Name</b>	Personal Relationships at Work Policy
<b>Owner</b>	People & Culture Team
<b>Document Location</b>	<a href="https://unicumbriaac.sharepoint.com/sites/VCO/Lists/PolicyMasterList/Public.aspx">https://unicumbriaac.sharepoint.com/sites/VCO/Lists/PolicyMasterList/Public.aspx</a>
<b>Lead contact</b>	Debbie Hurst, HR Business Partner
<b>Approved By</b>	BAB
<b>Latest Approval Date</b>	12 <sup>th</sup> August 2025
<b>Date for Next Review</b>	1 year
<b>Related University Policy Documents</b>	Prevention of Bullying, Harassment & Sexual Misconduct Policy Employees Code of Conduct Grievance Policy Disciplinary Policy Public Interest Disclosure Policy
<b>Version Number &amp; Key Amendment</b>	V01
<i>For Office Use – Keywords for search function</i>	

## **Appendix 1**

### **PROCEDURAL GUIDELINES**

The normal expectation is that the following procedural guidelines will apply. However, on occasions, and for exceptional / other good reasons, there may be the need to vary the procedures to suit individual cases / circumstances, and accordingly the University reserves the right to amend the procedures. The University will consult with the recognised union(s) regarding any proposal to vary the procedure.

#### **When to declare a relationship**

A close personal or intimate relationship must be disclosed:

- Where a close personal or intimate relationship exists between an employee and student where there is a potential or actual conflict of interest exists, for example including direct student supervision, or
- Where a close personal or intimate relationship exists between employees where the relationship may give rise to real or perceived conflict of interest, breach of trust or confidentiality.

The following list includes some examples of where close personal or intimate relationships between employees may pose risks of actual, perceived or potential conflict of interest. This may be through direct participation or indirect influence. This list is not exhaustive:

- Where there is a direct or indirect reporting line between the employees.
- Participating in recruitment and selection activity where there is a close personal or intimate relationship with a candidate.
- Providing input to the Annual PPDR process
- Providing input to recommendation for job description regrading, Promotion, or recommendation for Pay Review.
- Providing references on behalf of the University.
- Provision of services e.g. contractors.

Where employees are in an intimate or close personal relationship, consideration will be given on how to prevent real or perceived conflict of interest, breach of confidentiality or unfair advantage gained (or perceived to be gained) from the overlap of a personal and professional relationship.

This may include an individual's decision-making responsibilities changing (e.g. promotions, recruitment, pay review) if it impacts the other employee's, moving one party to another area of work or location, or finding alternative line management arrangements.

Where there is a clear conflict of interest (for example, manager and direct report in an intimate relationship), alternative line management arrangements would be put in place.

The line manager will only inform other relevant employees about the relationship (e.g. in order to explain a change in management arrangements) if the individuals concerned agree.

Employees should also seek advice from their line manager before becoming involved in any areas of activity, which could result in preferential treatment and or a conflict of interest.

If in doubt the best course is to declare a relationship, so that appropriate measures can be considered. Employees who are uncertain about whether they should declare a relationship are invited to seek guidance from the People & Culture Team. Declarations should be made via MYHR.

All declarations will be treated respectfully, sensitively and confidentially and the wishes of both parties will be respected as far as is possible. Sensitive personal data will be stored securely and managed in compliance with data protection legislation.

If in doubt the best course is to declare a relationship, so that appropriate measures can be considered. Employees are particularly encouraged to seek advice if the other party expressly does not wish the relationship to be declared.

### **Immediate declarations required**

This section applies to relationships, which are in existence at the time this policy is published.

Employees must, within two months of this policy being published, declare any existing relationship with a student and/or with another employee or third parties where there is a real or perceived conflict of interest. This must be done in confidence and in accordance with this policy.

Any employee with an existing intimate relationship with a student (as at the launch date of this revised policy) must declare this as soon as practically possible.

### **How to declare a relationship**

Employees should declare the relationship to their line manager via MYHR.

### **Identify who needs to know**

The line manager should discuss with the employees, the names of any other relevant individuals who may need to be informed of the declaration. The wishes of the parties concerned will be respected as far as is possible when identifying who will need to know.

The declaration will be treated as confidential by the University and maintained on the employee's MYHR record.

Line managers must only share details of declared relationships with those who need to be made aware to help manage risk and mitigations. The information will only be disclosed on a 'need-to-know' basis and with the employee's consent e.g. where alternative arrangements must be made (which may cover for example the tutoring, supervision and assessment of a student).

### **Determine what actions are necessary**

The line manager should in discussion with the employees to determine what actions, if any, are required to remove any real or perceived conflict. If appropriate, the relevant

senior manager may also be consulted with. Following this discussion, all parties should be clear what the actions will be, how they will be implemented and who will be informed. It is advised that this is recorded within MYHR.

## **Escalating concerns**

Anyone who becomes aware of any potentially inappropriate relationships involving other employees or students which may give rise to a conflict of interest, trust or breach of confidentiality, should raise the issue in confidence immediately with their line manager or the People & Culture Team. If they do not feel they can make a direct approach, employees can follow the process outlined in the Public Interest Disclosure Policy.

Additionally, employees who feel a student is developing an inappropriate relationship with them, another employee or vice versa, should raise this in with their line manager and record concerns centrally via the 'Report and Support' portal in line with Prevention of Bullying, Harassment & Sexual Misconduct Policy.

It may also be appropriate for employees to declare where they may feel uncomfortable with unwanted non-consensual attention from a student. In this instance employees are advised to discuss with their line manager and record concerns centrally via the 'Report and Support' portal in line with Prevention of Bullying, Harassment & Sexual Misconduct Policy. Where there are cases of this from fellow employees, it should be raised to a manager or using the employee confidential reporting tool, again in line with Prevention of Bullying, Harassment & Sexual Misconduct Policy. This tool can be accessed via the [Healthy Relationship Hub](#).

An employee who is, or who has been, involved in an intimate relationship with another employee and who does not consider their involvement to be truly consensual will have the right of complaint under the University's Prevention of Bullying, Harassment and Sexual Misconduct Policy.

Students who are, or who have been, involved in a romantic/sexual relationship with an employee, and who do not consider their involvement to be truly consensual will have the right of complaint under the University's student referral processes.

Employees should be aware that where it is found that there is a relationship that has a conflict of interest and this has not been declared, the formal disciplinary process may be invoked.

## **Breakdown of relationships**

Where an intimate relationship ends it is expected that all parties will continue to conduct themselves in a professional manner in the university and avoid personal disputes which impact on the working environment or other colleagues and students. It may also be appropriate for some of the actions, put in place by the university during the relationship, to continue for a period of time following the end of the relationship. Employees involved will be consulted and required to comply with reasonable actions.

## **Appendix 2**

### **Examples of conflict of interests**

Although not an exhaustive list, the below examples provide guidance:

- An employee who enters into a close relationship with a student and has influence over the student's academic, financial, progression or other opportunities.
- A close relationship in which the involved employees are at differing levels of seniority within the same Institute/Service within the University, particularly when within the chain of line management and/or when one of the employees has significant control or influence over decisions which affect the other.
- An employee who has a relationship with a client (including a student) customer, contractor or supplier and their job allows them authority over the client, etc., for example, if they have the authority to decide who to award contracts to.
- A relationship between an applicant and recruitment decision maker.

### **Examples of relationships which do not need to be declared**

- A social relationship with a fellow colleague where there is no actual or perceived conflict of interest.
- An intimate relationship (i.e. cohabiting couple) who do not work in the same team/ institute and neither party has access to information and or influence which could result in a perceived conflict of interest.
- Where a family member of an employee joins the University as a student, and the employee has no access to information, and or influence which could result in a perceived conflict of interest.

## **Appendix 3**

### **Steps to be taken following a disclosure of a personal relationship**

#### **Communication and record keeping**

Disclosures, reports or concerns raised under the Personal Relationships at Work policy should be treated in confidence as far as that is reasonably possible and in line with prioritising the welfare of students and employees, and GDPR regulations.

In exceptional circumstances the University may be required to inform third parties, where appropriate, of any matter falling within the scope of the Personal Relationships at Work policy.

Any disclosures should be made via the MyHR form and will only be accessible by the line manager to ensure that all reasonable steps are taken to mitigate risk and will be held securely within the People & Culture Team. All data will be maintained confidentially in line with GDPR regulations.

#### **Management of disclosures or reports of close personal relationships**

All disclosures should be made in the first instance to the relevant line manager via the MyHR form.

The line manager, in strictest confidence, should consider any risks and put in place actions to mitigate that risk in line with the Personal Relationships at Work policy, and indicate on the MyHR form before it is submitted to People & Culture Team.

Where a disclosure to the line manager may not be possible or appropriate, it should be made in writing to the relevant Director or Dean.

Where a disclosure to the Director or Dean may not be possible or appropriate, it should be made in writing to the People & Culture Team.

### **Alternative arrangements**

Following disclosure of a close personal relationship, the line manager, will assess whether alternative arrangements are appropriate, and if so, implement those arrangements at the earliest possible opportunity.

In practice, this may involve:

- Consulting with both parties to identify any impact the relationship may have on them and on the University.
- Reorganising duties to remove professional contact, or where that is not possible, to minimise professional contact, and ensuring that an employee is not teaching, supervising, assessing, examining, providing pastoral care, or is otherwise professionally responsible for administering activities in which a student with whom they have a personal relationship.
- Ending or modifying the professional contact between both parties to ensure there is no risk to the welfare or integrity of either party, and/or no breach of other applicable University policies.
- Ensuring that all and any available and reasonable action is taken to minimise the potential effect of the relationship on other employees, students, the University community, and the University's reputation.
- Ensuring that employees do not write references or recommendations for any employee or student with whom they have a personal relationship.

After any alternative arrangements are put in place, the line manager will consider whether any further actions are necessary to promote and safeguard the welfare of the parties involved and mitigate any risk to the University.

Such further actions may include:

- ensuring that any individuals affected are aware of the University's support services.
- in cases where there is a failure to comply with the Personal Relationships at Work policy and arrangements put in place under the policy, taking appropriate action under the relevant disciplinary procedures.

### **Consequences for breach of the Personal Relationships at Work policy**

Any employee who breaches the Personal Relationships at Work Policy (which includes a failure to disclose) may face disciplinary action. Please refer to the University's Disciplinary Policy and Procedure for more information.

