

HUMAN RESOURCES POLICY

Personal Relationships Policy

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1.0 Introduction

- 1.1 The College recognises that good working relationships are essential to the creation of an effective workplace and encourages all members of staff to foster strong professional relationships with colleagues. Professional relationships between staff, and between staff and students that facilitate learning, research and the exchange of ideas are supported and encouraged.
- 1.2 Personal relationships between staff members, particularly those where there is a significant seniority and/or power difference, and personal relationships between staff and students have the potential to have unfortunate unintentional consequences. Such relationships can generate perceived, and sometimes real, inequalities that affect those in the relationship and also other members of staff and students.
- 1.3 This policy seeks to ensure that personal relationships are conducted in such a way that the work and wellbeing of the individuals involved, and other members of staff and students is not adversely affected, and that equality of opportunity, professionalism and commitment to the College is always maintained.
- 1.4 Line managers, supervisors and members of staff are required to familiarise themselves with and understand this policy.

2.0 Scope and purpose of the policy

- 2.1 The College recognises that socialising on a friendship basis between staff and between staff and students is a positive aspect of being an active member of the College community, however the nature of staff/student and staff/staff relationships imposes particular responsibilities and duties on staff.
- 2.2 This policy sets out the expectations and obligations of staff with respect to personal relationships between staff and between staff and students 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.
- 2.3 This policy prohibits close personal or intimate relationships between staff and students where there is direct supervision.
- 2.4 There must be a clear declaration:
 - Where a close personal or intimate relationship exists between a staff member and student with no direct supervision, or
 - Where a close personal or intimate relationship exists between members of staff where the relationship may give rise to real or perceived conflict of interest, breach of trust or confidentiality.
- 2.5 This policy applies to close personal or intimate relationships which are formed after the implementation date of this policy. Existing relationships are referred to in section 8.

3.0 Equality and diversity

As a College, we are defined by our community of staff and students. Therefore we will only succeed in our [mission](#) to achieve enduring excellence in research and

education in science, engineering, medicine and business for the benefit of society, by cultivating an environment that respects, supports and celebrates all the people who come to Imperial, enabling them to enrich the world and their own lives through work and study.

Implementation of this policy must be clear and transparent and not subject to any unfair discriminatory practices.

This policy is inclusive and applies to all staff, irrespective of any protected characteristic.

4.0 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.

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 the staff member 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 the staff member.

Breach of trust: an implied duty that neither employer nor staff member will act so as to breach the duty of mutual trust and confidence that exists between them, without good reason. If the staff member does breach the duty, it can entitle the employer to take action which could include terminating the contract of employment.

Staff: any person who is engaged by the College as an employee or worker or who applies to be engaged by the College as an employee or worker. This includes honorary and emeritus staff.

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.

5.0 Personal relationships between members of staff

- 5.1. Relationships between members of staff are not prohibited. However, some guidance is necessary where such staff are brought into closer professional contact and it is important to ensure that the recruitment, selection, development, management and promotion of staff are based solely on worth, and not in any way affected by personal relationships. Staff 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 which will need to be declared and require measures to be put in place (see section 8).

- 5.2. In order to prevent potential abuse of power or perceived or real conflict of interest, staff 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.
- 5.3. The following list includes some examples of where close personal or intimate relationships between staff 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 staff members.
 - Participating in recruitment and selection activity where there is a close personal or intimate relationship with a candidate.
 - Providing input to the Personal Review and Development Plan (PRDP) process.
 - Providing input to recommendation for job description regrading, Promotion, or recommendation for Pay Review.
 - Making a recommendation or decision in relation to application for funding.
 - Providing references.
 - Provision of services e.g. contractors.
- 5.4. Where staff 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.
- 5.5. This may include an individual's decision-making responsibilities changing (e.g. promotions, recruitment, pay review) if it impacts the other staff member, moving one party to another area of work or location, or finding alternative line management arrangements. HR should be involved in any discussions regarding this issue and will provide objective assistance and ensure College-wide consistency.
- 5.6. The line manager will only inform other relevant members of staff about the relationship (e.g., in order to explain a change in management arrangements) if the individuals concerned agree. If a line manager is informed of an alleged relationship by another member of staff or student, they should speak to their Strategic HR Partner for advice.
- 5.7. To maintain appropriate relationships with colleagues/peers, and reduce the risk of abuse of power or conflict of interest, staff should:
- perform College duties in the best interests of the College without favour towards any individual staff member over another;
 - avoid paying undue special attention to a particular member of staff;
 - Use College communications channels (College email account, telephone, Microsoft Teams, and internet access) for work-related communications with staff unless this is not possible.
 - be aware that any email sent to a staff member about a colleague may be disclosed to them or their advocate under the General Data Protection Regulations. All emails and work-related messages should be written in a professional manner;

- establish boundaries between professional and non-professional communication with colleagues;
 - adhere to the same guidelines, where logistically possible, when you and the staff member are participating in fieldwork, conferences, and other College activities away from your usual workplace;
 - where possible, ensure that meetings and discussions about College matters occur on campus or other appropriate premises;
 - refer colleagues with support needs to a relevant College support service, such as occupational health or our employee assistance programme and be mindful to limit their role in providing personal support to a staff member where this is not part of their employment duties.
- 5.8. Where an intimate relationship ends it is expected that all parties will continue to conduct themselves in a professional manner in the College 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 College during the relationship, to continue for a period of time following the end of the relationship. The staff members involved will be consulted and required to comply with reasonable actions.

6.0 Personal relationships between staff and students

- 6.1. Staff members must ensure their interactions with students are always of a professional and appropriate nature in line with the College's values and ethics.
- 6.2. The College **prohibits** close personal and intimate relationships between staff and students where the staff member has direct responsibility for, or supervisory, tutoring, teaching, pastoral care or assessment responsibility for that student. A breach of this will be investigated under the College's Disciplinary policy or Ordinance as appropriate.
- 6.3. Staff have an obligation to declare a close personal or intimate relationship with **any other student**, for whom they do not have direct supervision, (whether new or existing), to enable the College to assess whether any potential or actual conflict of interest exists. These relationships must be reviewed carefully to consider the extent to which measures must be taken to address real or perceived conflict of interest, exploitation, favouritism, or bias, particularly if such relationships exist within the same Department. See section 8 for the declaration process.
- 6.4. **Students who are employed as staff or engaged as casual workers alongside their studies (including Graduate Teaching Assistants /Undergraduate Teaching Assistants)**

Students who are employed as members of staff or engaged as casual worker on a part-time or temporary basis alongside their studies are prohibited from having a close personal or intimate relationship with another student that they have direct responsibility for, or supervisory, tutoring, teaching, pastoral care, or assessment responsibility for as part of their employment or engagement.

Students who are employed as staff or engaged as casual workers on a part-time basis alongside their studies are required to declare any intimate or close personal relationship with any other student that may give rise to a real or perceived conflict of interest, exploitation, favoritism or bias, or where a new situation arises in an existing

relationship that may give rise to real or perceived conflict of interest, exploitation, favoritism or bias due to their employment or engagement with the College.

Where a close personal or intimate relationship exists between two students and one of the parties subsequently becomes employed or engaged by the College, so that their primary status at the College is as a member of staff, the relationship will need to be declared if circumstances are such that the relationship may give rise to a real or perceived conflict of interest, exploitation, favouritism or bias.

6.5 Personal relationships for staff in voluntary pastoral roles: Wardens, Sub-Wardens and Residence Assistants

The College **prohibits** close personal and intimate relationships between staff and students where the staff member has direct responsibility for that student. This includes those in a Warden (staff) and Sub-Warden (PhD student) line management context.

PhD students engaged by the College as Sub-Wardens/Residence Assistants provide wellbeing support to residents in their hall and, as such, have pastoral care responsibility for those students. Therefore, close personal and intimate relationships between Sub-Wardens/Residence Assistants and a student they provide pastoral care for as part of their responsibilities are **prohibited**.

A breach of this will be investigated under the College's Disciplinary policy or Ordinance as appropriate.

7.0 Relationships with students or staff under the age of 18 or who are an 'adult at risk'

7.1. Members of staff must not be in, or enter into, a close personal or intimate relationship with a student or staff member under the age of 18, or an adult known or suspected to be at risk, for whom they have any responsibility for, or involvement in, that person's academic studies and/or personal welfare.

7.2. Staff must not engage in sexual behaviour with someone with whom they are in a position of trust. Whilst a young person can consent to sexual activity once they reach the age of 16, the Sexual Offences Act (2003) makes it a criminal offence for a person to engage in sexual activity of any kind with a person under the age of 18, where the adult is in a position of trust.

7.3. Anyone suspecting a member of staff of acting inappropriately towards a student or staff member under the age of 18 or an adult at risk should refer to the [Safeguarding Policy and Procedure](#) and contact their local [Safeguarding Officer](#).

8.0 Professional conduct and appropriate conduct

8.1. All Staff must conduct themselves professionally and appropriately in their interactions with colleagues and students in line with our [College values](#). Staff should remain respectful and ensure they refrain from behaviours which could be perceived as sexual harassment, bullying, favouritism and exploitation. Any conflict of interest or perceived conflict of interest relating to personal relationships should be addressed in accordance with the procedure outlined below.

- 8.2. The College is committed to ensuring a working and learning environment free from sexual harassment, sexual misconduct and sexual violence so all members of the College community can enjoy the right to study, live, work and be respected for the contribution they make. All members of staff have a duty to report sexual harassment, and misconduct if they identify it within their Department/School/Services. Further information can be found in the [Sexual Harassment, Sexual Misconduct and Sexual Violence Policy](#). In addition, staff or students can anonymously disclose unwelcome behaviours using the [Report + Support](#) tool.
- 8.3. If a student or member of staff become uncomfortable with the nature of the interactions they have with another person at the College, or are concerned about a relationship or the level of interest someone may show towards them, they are encouraged to discuss this with their personal tutor, Senior Tutor, line manager or HR.
- 8.4. In addition, students or staff with any questions about the application of the policy are encouraged to discuss this with their personal tutor, another member of staff, or their Head of Department if appropriate to ensure appropriate support and guidance is provided.

9.0 Disclosing a close personal or intimate relationship

- 9.1. A close personal or intimate relationship must be disclosed:
- Where a close personal or intimate relationship exists between a staff member and student with no direct supervision, or
 - Where a close personal or intimate relationship exists between members of staff where the relationship may give rise to real or perceived conflict of interest, breach of trust or confidentiality.
- 9.2. All declarations are to be made as soon as reasonably practicable and always within one month.
- 9.3. All declarations will be treated respectfully, sensitively, and confidentially and the wishes of both parties will be respected as far as is possible. This includes same-sex relationships where the parties may not be “out” publicly and respect for the cultural values of the parties involved. Any breach of confidentiality of information provided in the declaration will be investigated and may be subject to disciplinary action. Sensitive personal data will be stored securely and managed in compliance with data protection legislation.
- 9.4. Any close personal or intimate relationships already existing at the time of implementation that has not previously been declared should be declared to their line manager or Strategic HR Partner by 30 April 2022.
- 9.5. Staff who are unsure whether they should disclose a relationship with another staff member should seek advice from their line manager, Head of Department, or their Strategic HR Partner. Staff are particularly encouraged to seek advice if the other party expressly does not wish the relationship to be reported.

9.6. Any staff member is welcome to seek advice, on an informal basis, confidentially from their Strategic HR Partner before discussing their situation with their line manager.

9.7. The below steps set out the process for declaring a personal relationship:

1. Declare the relationship

Staff should declare the relationship to their line manager. Some staff may prefer to discuss and declare the relationship to their Strategic HR Partner in the first instance, but the expectation is that where actions are required to remove any real or perceived conflict, other individuals, including the person's line manager will need to be informed.

2. Identify who needs to know

Before disclosing the relationship to others, the line manager should discuss with the member of staff 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. If the member of staff has concerns about who needs to be informed, the line manager should discuss with their Strategic HR Partner.

In some situations, it may be appropriate for the line manager to discuss the declaration anonymously with the Strategic HR Partner when seeking advice.

3. Determine what actions are necessary

The line manager should contact their Strategic HR Partner who will discuss the details with the line manager and the member of staff 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.

4. Document actions

Any actions taken to remove any real or perceived conflict of interest should be documented by the Strategic HR Partner and provided to the member of staff and student or colleague and the relevant line manager. A record of the actions should be held confidentially on the member of staff's central HR record.

5. Unresolved matters

Any unresolved matter may be referred to the Director of HR and/or Vice Provost (Education and Student Experience), as appropriate.

9.8. Any measures put in place will be subject to review and may be removed or changed if the relationship ends or there is a change in real or perceived conflict of interest.

9.9. Failure of a staff member to disclose a close personal or intimate relationship with a student, or with another staff member where there is a real or perceived conflict of interest, breach of trust or confidentiality may be investigated under the disciplinary policy and procedure or relevant Ordinance applicable to academic staff.

10.0 Related policies and guidance

- [Sexual Harassment, Sexual Misconduct and Sexual Violence Policy](#)
- [Harassment, Bullying and Victimisation Policy](#)

- Grievance Policy and Procedure
- Disciplinary Policy and Procedure
- Discipline, Grievance and Dismissal Procedures for Academic Staff
- Safeguarding Policy and Code of Practice