

**PERSONAL RELATIONSHIPS**

**POLICY**



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PERSONAL RELATIONSHIPS POLICY

POLICY

**Introduction**

The University aims to create a positive environment where staff and students can thrive. The University does not wish to interfere in the personal lives of its students or staff. However, the University must recognise that there are risks when one party is in a position of power, trust and authority relative to the other.

The University values and relies on the professional integrity of relationships between staff members and in the staff/student relationship. In order that University activities are conducted and are perceived to be conducted in a professional and appropriate manner it is necessary to distinguish between, and take account of, personal relationships which overlap with professional ones.

The University recognises that there may be occasions when students or staff members are related to or become close to another member of staff. They may be faced with situations where personal interest may conflict with their duties and may be uncertain about how to deal with them. This policy seeks to identify appropriate behaviour in such situations.

**This policy covers close personal relationships which can include:**

**Intimate relationships** - including all sexual or romantic contact, whether in person and/or online or via means of other electronic or written communication, one-off or longer-term.

**Close friendships** – this covers personal relationships which extend beyond usual work, study or extracurricular/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.

**Family relationships** – including partners, spouses and children.

These are examples of personal relationships, but personal relationships may exist which fall outside of these parameters. If staff are unsure as to whether a personal relationship should be declared, they should discuss this with their line manager, or the Human Resource Department.

This policy is intended to ensure that appropriate safeguards and processes are in place to prevent abuses of power and sexual misconduct. This policy also seeks to protect students and staff from allegations of actual or perceived conflicts of interest. In doing so it seeks to ensure a positive and supportive working environment where all are treated fairly, thereby that the University meets its commitment to the fair, equal and consistent treatment of all and to ensure the wellbeing of all the University’s community is protected.

Scope

2.1 This policy applies to all staff employed by the University, visiting lecturers/researchers, casual workers, agency workers, holders of honorary status, students who are employed by the University, apprentices, Governors and Third Parties and anyone else engaged by the University and any of its subsidiary companies to provide a service to either students, prospective students or partners and governors.

**Definitions:**

**Students:** anyone studying at the University including postgraduate students, distance learners, summer school students and apprentices.

**Familial Relationship:** a connection or association by family or relatives, including spouses, domestic partners and their relatives.

**Intimate Relationship:** any one-off or ongoing consensual contact between a member of staff and a student, or between two members of staff which involves physical intimacy including isolated or repeated sexual activity; or romantic or emotional intimacy.

**Abuse of Power:** ‘Abuse of power’ means a situation where a staff member exploits a position of power in relation to a student to apply pressure in a way which: may result in the student doing something, or refraining from doing something, that they may not have otherwise done; and that action or inaction could reasonably result in something that falls within the scope of an intimate personal relationship.

**Grooming:** Grooming is an abuse of power which can be defined as a gradual process that someone in a position of power uses to manipulate someone to do things they may not be comfortable with and to make them less likely to reject or report abusive behaviour. Grooming will initially start as befriending someone and making them feel special for the purpose of exploitation.

**Adult at risk.**

Under The Care Act 2014, an adult at risk is someone over 18 years old who:

1) has care and support needs

2) is experiencing, or is at risk of, abuse or neglect

3) because of their care and support needs is unable to protect themselves against the abuse or neglect or the risk of it.

**Consent:** Free, informed, clearly expressed and ongoing agreement to a relationship.

**Exploited Consent**: Consent which appears to have been freely given but would not have been given if one party did not hold a position of trust, power or authority.

**Conflict of Interest:** A situation in which an individual has a private or personal interest. A conflict of interest occurs when an individual's personal interests – family, friendships, financial, or social factors – could compromise their judgment, decisions, or actions in the workplace.

**Harassment:** has the meaning given in section 26 of the Equality Act 2010 and section 1 of the Protection from Harassment Act 1997 (in its entirety, and as interpreted by section 7 of the Act).

‘incidents’ includes, but is not limited to, circumstances where: allegations or complaints are made to the University about harassment and/or sexual misconduct; and that the University could reasonably be considered to have grounds for suspecting that harassment and/or sexual misconduct has taken place or is taking place.

Harassment and bullying may be manifested in a variety of forms, all of which are offensive and unacceptable to the University of Wolverhampton whether the harassment or bullying is between students; between staff and student(s); between student(s) and staff; or between staff.

Harassment and bullying are deliberate and unpleasant behaviour which is not necessarily persistent. One of its effects is to make the victim feel uncomfortable, patronised, humiliated or threatened. It also has the effect of maintaining existing inequalities of power and opportunity.

It results in:

* making a job or study difficult to do
* creating an intimidating or hostile working or learning environment
* affecting the health or safety of individuals by causing stress
* endangering career and job prospects.

Racial harassment includes derogatory name-calling, insults, racist jokes, racist graffiti and other written insults, bringing racist material such as posters, leaflets or magazines into the University of Wolverhampton or making threats against or physically intimidating a person or group because of colour or ethnicity.

Harassment against those with disabilities includes derogatory name-calling, insults and other actions which result in the individual feeling uncomfortable, patronised, humiliated or threatened.

Bullying is a form of harassment that includes belittling and destructive criticism, insults and isolation. It can include humiliating, undermining or patronising an individual in front of their colleagues. It may involve deliberately undervaluing an individual's work contribution and achievements. Bullying can extend to blocking attempts by an individual to complain about their treatment and can create an atmosphere of anxiety and fear.

**Sexual Misconduct and Harassment**

Sexual misconduct and harassment can involve a range of inappropriate and unwanted

behaviours and acts of a sexual nature. It covers:

- all forms of sexual violence, including sex without consent

- sexual abuse (including online and image-based abusive content)

- non-consensual sexual touching

- sexual harassment (unwanted behaviour of a sexual nature which violates your dignity.

makes you feel intimidated, degraded or humiliated or creates a hostile or offensive

environment).

- stalking.

- abusive or degrading remarks of a sexual nature; and

- a vast range of other behaviours.

**‘Excluded relationships’** in the context of this policy, the commencement of **new** staff and student intimate relationships are **Prohibited**.

An Excluded relationship in the context of this policy means any ongoing intimate or close relationship that existed **before** the date this policy came into force and that remains in existence, or existed before the staff member became a staff member in relation to that student.

These relationships **do** need to be formally disclosed.

3. Responsibilities

**3.1.1 Managers**

**Managers must:**

* Ensure that all members of staff, casual workers, consultants etc. are fully aware of and adhere to the terms of this policy
* Ensure that they encourage openness within their teams
* Ensure that they deal compassionately and fairly with staff when they make any disclosure
* Carry out risk assessments to protect both staff, students and other relationships in collaboration with [Human Resources](https://www.wlv.ac.uk/staff/services/humanresources/about-us/) and [Safeguarding colleagues.](https://www.wlv.ac.uk/about-us/corporate-information/safeguarding/)

**3.1.2 Staff**

**Staff must:**

* Follow the rules and guidance contained within this policy
* Advise their managers, at the earliest possible opportunity (as soon as the relationship falls within the scope of the definitions set out within this policy), of any relationships that they feel may fall under the remit of this policy
* For clarity, disclosures relating to any pre-existing or ongoing personal relationships that fall within the scope of this policy, between staff and students, and between staff members, must be made **within one month** of this policy coming into effect.

**3.1.3 Human Resources**

**Human Resources Service will:**

* Provide guidance to managers and staff on the application of this policy.

4. General Principles

* + 1. The application of this policy will be in accordance with the University’s core values and behaviours as set out within our University Strategy 2035.

“At the University of Wolverhampton people are at the heart of all that we do. Those people are our students, our colleagues, and our external partners. There are key values and behaviours which drive all that we do:

* **Inclusive**: We are welcoming, respectful, collegiate and supportive.
* **Ambitious**: We are imaginative, confident, innovative and deliver excellence.
* **Accountable**: We take pride in what we do and how we do it, take responsibility for our actions and operate with transparency and integrity.
* **Resilient**: We have a positive outlook; we are adaptable and recover from setbacks”.

5. Prohibited Behaviour

Inappropriate, coercive or predatory behaviour of a sexual nature is prohibited and may be subject to criminal investigations.

5.1.1 For staff, such behaviour towards any other member of the University constitutes serious or gross misconduct and will be subject to Disciplinary Procedure, the consequence of which can include dismissal from the University. This includes but is not limited to promising or alluding to rewards in return for sexual favours or suggesting or threatening withdrawal of teaching or other forms of support if sexual access is not granted.

5.1.2 Any student who exerts sexual pressure over another student or a member of staff, or who behaves in a coercive, harassing or predatory manner towards another member of the University, will be subject to the University’s Student Code of Conduct and the associated Disciplinary Procedure, the consequences of which can include expulsion from the University.

**5.2 Reporting mechanisms are:**

5.2.1 Staff who witness or experience any inappropriate, coercive or predatory behaviour should report concerns to the University using the [Safeguarding Reporting Form](https://www.wlv.ac.uk/about-us/corporate-information/safeguarding/).

5.3.1 Students who witness or experience any inappropriate, coercive or predatory behaviour are encouraged to report it to another member of staff (such as their Programme Leader or directly via the [University Safeguarding Reporting Form).](https://www.wlv.ac.uk/about-us/corporate-information/safeguarding/)

5.3 All reports made under the above will be treated sensitively.

6 Personal Relationships

The University values and relies upon the professional integrity of relationships between staff members and in the staff/student relationship. In order that University business is conducted and is perceived to be conducted in a professional and proper manner it is necessary to distinguish between, and take account of, consensual personal relationships and professional ones, especially if they overlap.

6.1.1 This policy covers close personal relationships which can include:

**Intimate relationships** - including all sexual or romantic contact, whether in person and/or online or via means of other electronic or written communication, one-off or longer-term.

**Close friendships** – this covers personal relationships which extend beyond usual work, study or extracurricular/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 study. It does not cover work-related group activity such as Friday-night socialising with colleagues.

**Family relationships** – including partners, spouses and children.

6.2 The purpose of this Policy/procedure is to ensure that the correct process is followed so that members of staff are not open to allegations of impropriety, bias, abuse of power, discrimination, conflict of interest or favouritism.

6.3 The relationships between staff and students are heavily reliant on mutual trust and confidence and can be jeopardised when a member of staff enters a romantic/sexual relationship with a student and can result in an abuse of power. The University relies upon the integrity of both parties to ensure that abuses of power do not occur.

6.4 Staff should recognise a professional and ethical responsibility to protect the interests of students, to respect the trust involved in the staff/student relationship and to accept the constraints and obligations inherent in that responsibility.

6.5 Any sexual relationship with a student under the age of eighteen is likely to constitute a criminal offence under the ‘abuse of trust’ provisions of the Sexual Offences Act 2003. This can include any form of sexual contact. The University deems any sexual relationship with a student under eighteen as professional misconduct and does not permit them under any circumstances. Staff found to be in an intimate relationship with a student under eighteen will be subject to disciplinary action and referral to the police and local authority safeguarding.

7 Staff Student Relationships

7.1.1 All personal relationships (intimate, close friendship or family) must be disclosed by the member of staff involved. Staff must advise their line manager and respective HR business partner, as appropriate in writing and include safeguarding@wlv.ac.uk. Students who are working at the University in non-sensitive roles, where power imbalances do not exist, are not required to disclose relationships with other students under this policy. Such roles include (but are not limited to) roles such as hospitality workers, student ambassadors and University internships. In cases where staff members also hold student status at the University of Wolverhampton, their staff member status takes precedent.

7.1.2 Failure by a member of staff to declare a personal relationship with a student may result in disciplinary action being taken. However, it is important that should someone subsequently experience harassment and/or bullying, that they do not feel impeded in reporting simply because a previous relationship has not been declared. Therefore, staff should not avoid reporting bullying or harassment for fear of disciplinary action being taken for non-disclosure of a close personal relationship.

7.1.3 Students are encouraged to declare involvement in a relationship with a staff member to another member of staff in the University as soon as possible whether this is at any point during the relationship or after a relationship has ended. Students may approach any member of staff with this information (for example, their Programme Leader, a member of [Student Life](https://www.wlv.ac.uk/university-life/student-life/) (Mental health and wellbeing, accessibility, disability and inclusion, Support to Study, Student Money), or they can directly report via the [Safeguarding Reporting Form](https://www.wlv.ac.uk/about-us/corporate-information/safeguarding/)).

7.1.4 Where a disclosure of a pre-existing and or current close personal relationship is made, the line manager, in conjunction with [Human Resources](https://www.wlv.ac.uk/staff/services/humanresources/about-us/) and [Safeguarding](https://www.wlv.ac.uk/about-us/corporate-information/safeguarding/) will ensure measures are put in place to prevent actual or potential conflicts of interest, while dealing with the matter in a manner that aims to protect the dignity and privacy of all parties. The following will apply:

* The member of staff will not be involved in the student’s assessment (including Annual Progress Monitoring for PGR students)
* The member of staff will not take any direct individual responsibility for academic, administrative and/or pastoral or other support responsibilities for the student
* Where the relationship is between a supervisor and their PGR student, the supervisor should be removed from the supervisory team
* Alternatively supervisory responsibilities should be organised to ensure that the member of staff is not the lead supervisor. If appropriate, appointing an additional member of the supervisory team should be considered. Where expertise is not available within the University, an external should be considered
* A point of contact will be identified for the member of staff and student respectively, for example a HR Adviser and a member of Student Life
* The member of staff and the student will be expected to comply with any reasonable decision or action.

7.1.5 If a member of the University becomes aware of, a close personal, or intimate relationship between a member of staff and a student and is uncertain about what action to take, advice should be sought from their HR team/Head of School/Service or Director of Services alongside [Safeguarding](https://www.wlv.ac.uk/about-us/corporate-information/safeguarding/). If a member of staff becomes aware of an intimate relationship between a member of staff and a student, and has concerns that this relationship might involve coercion, predatory behaviour or constitute an abuse of power, they should report their concerns to [safeguarding@wlv.ac.uk](mailto:safeguarding@wlv.ac.uk).

8 Requirement to Disclose

8.1.1 The University **prohibits** new intimate relationships between staff and students, and recognises that:

* There is an inherent imbalance of power between staff and student
* In some circumstances, this power dynamic will potentially compromise a student’s ability to freely consent to or refuse interaction of a personal, intimate nature
* Such exploited consent is an abuse of power

8.1.2 To protect both staff and students, staff:

* Are **prohibited** from intimate contact with students
* Must disclose, in writing, if they are in, or have been in an intimate relationship with an incoming/current student
* This policy sets out an expectation that such personal relationships are disclosed formally within **one month** of this policy coming into effect, even if they have been disclosed previously
* Must disclose in writing, if they are in a family or close friendship relationship with an incoming/current student promptly, either within one month of them becoming a current student, or, within one month of this policy coming into effect (whichever is applicable), even if they have been disclosed previously.

8.2 This policy prohibits close friendship, family or intimate relationships between staff and students where there is **direct supervision or oversight of academic progress.** Staff are required to declare an intimate or personal relationship with **any other** student also, for whom they do not have direct supervision, (whether new or existing), to enable the University to assess whether any potential or actual conflict of interest exists.

8.3 Staff must disclose their relationship to their line manager, respective HR business partner and include [safeguarding@wlv.ac.uk](mailto:safeguarding@wlv.ac.uk).

**8.3.1 If a member of staff is in any doubt about the need to disclose a relationship with a student, they should err on the side of caution and disclose it.**

8.4 Staff must ensure that they advise their line manager if their relationship comes to an end, and cc [safeguarding@wlv.ac.uk](mailto:safeguarding@wlv.ac.uk) alongside their respective HR business partner. It is likely to be appropriate that staff continue to not be involved in the assessment, examination, supervision or pastoral care of the student even after the relationship has come to an end.

8.4.1 The manager to whom the disclosure is made must work in collaboration with the safeguarding team and the Human Resource Department to:

* Assess any conflict of interest, real or perceived
* Consider the welfare/concerns of any other individuals or groups
* Consider who needs to know about the disclosure
* Put in place protection measures to address/prevent the actual and/or perceived conflict of interest
* Put in place measures to protect the integrity and welfare of both parties
* Keep these measures under regular review
* Maintain a record of the disclosure and provide a copy to the [relevant Human Resources Business Partner](https://www.wlv.ac.uk/staff/services/humanresources/about-us/).

9 Failure to disclose

Failure to disclose an intimate, close or family relationship with a student will be treated as a disciplinary matter, and potential gross misconduct (see [Disciplinary](https://www.wlv.ac.uk/media/departments/compliance-team-/76e.-Disciplinary-Policy-and-Procedure.pdf) Policy).

10 Failure to Comply with Protection Measures

Staff are expected to adhere to any protection measures put in place by line managers and [Human Resources](https://www.wlv.ac.uk/staff/services/humanresources/about-us/) in line with this policy. Failure to comply with protection measures will be treated as potential gross misconduct and as a disciplinary matter (see disciplinary policy).

11 Relationships between staff members

11.1.1 The University does not seek to intrude in personal/intimate relationships between members of staff. However, such relationships may give rise to real and/or perceived conflicts of interest; to a breach of trust and/or confidentiality; to unfair advantage and/or perceptions of bias on the part of other staff. This is particularly the case where one member of staff has influence or control over the other member of staff’s working environment.

11.1.2 The purpose of this part of the policy is to ensure that the University can exercise its duty of care to all staff in their relationships at work, to avoid conflicts of interest and ensure appropriate transparency of management processes. The University only requires relationships to be declared between staff where there is a potential conflict of interest.

A conflict of interest between staff, and in terms of this policy, would include:

* line manager/supervisory role
* recruiting a prospective staff member
* working in the same team (this could be at any level in the University, including interdisciplinary teams)
* working on joint projects/partnerships between Schools, Research Institutes or Services
* being involved in decision making in relation to the other person (i.e. Selection/Promotion/Funding application)
* Close personal relationships between members of staff where there is not a management connection, but where the nature of the roles undertaken results in close working relationships, may also present a conflict of interest and/or operational challenge.

11.1.3 All family and intimate relationships as defined in this policy, which create or could be perceived to create a conflict of interest, must be disclosed by the staff involved by reporting to their Line Manager and/or [Human Resources business partner](https://www.wlv.ac.uk/staff/services/humanresources/about-us/), in the first instance.

11.1.4 Where a disclosure of a family or intimate relationship is made, the line manager(s) will consider, in consultation with Human Resources, ways in which any potential conflict of interest might be removed. For example, this might include the option to move one individual to another work team or location or removing an individual from a decision-making process where a conflict of interest could occur. The line manager(s) will also talk to the staff involved about other/new colleagues who may need to be informed to guard against any perception of impropriety relating to the relationship. In responding to a declaration of a relationship between staff, care will be taken to avoid any potential impact on the career prospects of the individuals concerned. All reports of relationships will be recorded along with any agreed actions.

11.1.5 Failure to declare a personal relationship which creates a conflict of interest may result in disciplinary action. However, staff should not avoid reporting bullying or harassment for fear of disciplinary action being taken for non-disclosure of a personal relationship.

11.1.6 Intimate relationships between members of staff can also give rise to situations where there is coercive or predatory behaviour. If intimate relationships arise between colleagues, and any person has concerns about any predatory or coercive element to such a relationship, they are encouraged to report or disclose this via the [University Safeguarding Reporting Form](https://www.wlv.ac.uk/about-us/corporate-information/safeguarding/).

12 Requirement to Disclose

12.1.1 Staff must disclose in writing to their line manager and or Human Resource Department if they are in, or have been in, an **intimate relationship**, **Family relationship** with an incoming/current member of staff with whom they will have a line management or supervisory connection.

12.1.2 Disclosure is required by **both** staff members and must be done in good time, following implementation of this policy.

12.1.3 Staff must not be involved in any decisions relating to a member of staff with whom they are immediately connected (intimate, or family), at any time.

* 1. Action to be taken on disclosure

The manager is required to:

* Assess any conflict of interest
* Put in place measures to prevent actual or perceived conflicts of interest
* Put in place measures to protect the integrity and welfare of both parties
* Keep these measures under regular review
* Maintain a record of the disclosure and provide a copy to their [Human Resources Business Partner](https://www.wlv.ac.uk/staff/services/humanresources/about-us/).

12.2.1 If a staff member advises that a relationship has come to an end, the line manager will need to consider whether any new arrangements need to be put in place to continue to protect both parties. They will also need to keep these new arrangements under regular review.

13 Failure to Disclose

Failure by a member of university staff to disclose an intimate, or family relationship with another member of staff where there is a conflict of interest (as set out above) will be treated as a disciplinary matter, and potential gross misconduct (see disciplinary policy).

14 Governors and Third Parties

* Staff and governors are expected to act professionally and with integrity
* Staff and governors are expected to identify and avoid any actual or perceived conflict of interest situations
* Any staff member or governor in a personal relationship (intimate, close friendship or family) with a student will be expected to declare that relationship
* A staff member or governor in a personal relationship (intimate or family) with another member of staff, which gives rise to a conflict of interest will be expected to declare that relationship
* This policy also applies to a member of staff who begins a personal relationship with a client, customer, contractor or supplier or when a personal relationship exists and then becomes a business, commercial or financial relationship
* If the individual's job allows them authority over a client, customer, contractor or supplier (for example if the member of staff has the authority to decide to whom to award contracts) the relationship must be declared to their Line Manager and/or Human Resources
* A declaration of personal relationships where they overlap with professional roles is required
* Staff who are uncertain about whether they should act regarding a personal relationship should seek guidance from their line manager or the Human Resource Department
* Staff and governors, and any third party who is conducting work on behalf of the university of Wolverhampton are expected to abide to the boundary set by the University, that, they must not pursue or accept any advances where a new intimate or close friendship relationship with a student occurs
* Where any personal relationship, as defined in this policy, is not declared and results in an unfair advantage or disadvantage to either of the parties involved in a relationship, this will be considered a serious matter and may lead to disciplinary action.

PROCEDURE

15 Making a disclosure

15.1.1 Staff are expected to disclose a personal relationship, either an intimate relationship or a familial relationship, at the earliest possible opportunity. For clarity, this policy sets out an expectation that they are disclosed within **one month** of this policy coming into effect, if such relationships already exist. The disclosure should be made in writing and addressed to their line manager. For cases involving a student, [safeguarding@wlv.ac.uk](mailto:safeguarding@wlv.ac.uk) must be included. The relevant [Human Resources Business Partner](https://www.wlv.ac.uk/staff/services/humanresources/about-us/) should be consulted by the line manager to gain advice and support also.

15.1.2 The line manager in collaboration with [Human Resources](https://www.wlv.ac.uk/staff/services/humanresources/about-us/) and or [Safeguarding](https://www.wlv.ac.uk/about-us/corporate-information/safeguarding/) will then be responsible for carrying out the appropriate risk assessment at either **Appendix A** for Staff/student relationships or **Appendix B** for staff/staff relationships.

15.1.3 The purpose of the risk assessment is to ensure that all parties are protected from claims of actual or perceived conflict of interest and allows for measures to be agreed and put in place to support both parties.

15.1.4 The nature of the disclosure will be treated sensitively. In the circumstances of a complaint where the disclosure may become pertinent information as part of the investigation, this information will be used. Other staff members will only be made aware of the measures required as part of the risk assessment on a need-to-know basis e.g. for the purposes of timetabling, or allocation of tutors.

16 Making a complaint

16.1.1 Members of staff who feel that they have been disadvantaged because of a personal relationship should raise any concerns via the University Grievance Policy and Procedure.

16.1.2 Where a complaint is received from a student then this will be investigated under the University’s Disciplinary Policy and Procedure.

16.1.3 Members of our student body who feel that they have been disadvantaged because of a personal relationship should raise any concerns via [Conduct and Appeals.](https://www.wlv.ac.uk/current-students/conduct-and-appeals/)

17 Vexatious or Malicious Complaints

16.1.1All complaints pertaining to this policy will be taken seriously and investigated fully. However, if a complaint is found to be vexatious, malicious or without merit then disciplinary action will be considered and is applicable to both staff and students.

18 Handling of Information and Data Protection

18.1.1 Concerns raised under this Policy should be treated in confidence as far as that is reasonably possible, and sensitively, consistent with safeguarding the welfare of students and staff.

18.1.2 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 because 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.

18.1.3 Records will be treated as confidential and be kept no longer than necessary in accordance with relevant data protection principles.

18.1.4 There may be circumstances where it will be necessary for Heads of School or Departments to notify a member of staff’s department. Consideration will be given to whether there is a potential risk to the student and/or other students arising from the nature of the allegations against the member of staff, the welfare of the student and the need to ensure that high standards of academic integrity and professional behaviour are maintained, while taking account of the data protection/privacy rights of the member of staff.

18.1.5 As a declaration may contain sensitive personal data it will be stored securely and managed in compliance with data protection legislation. Such declarations will be treated respectfully and sensitively, and the wishes of both parties respected as far as is possible. This includes same-sex relationships where the parties may not be “out” publicly.

18.1.6 Staff who are unsure whether they have a close personal or intimate relationship with a student or staff member, should seek advice from their line manager, Head of Department or their Human Resources Business Partner. Staff are particularly encouraged to seek advice if the other party expressly does not wish the relationship to be reported.

18.1.7 Students who are unsure whether they have a close personal or intimate relationship with a staff member should seek advice from their personal tutor, Academic Coach, head of school, or a member of the [Student Life Teams](https://www.wlv.ac.uk/university-life/student-life/).

19 Guidance for Staff

This guidance is intended to help staff maintain professional boundaries and so keep themselves safe from any accusations of improper behaviour. The same guidelines apply when staff and students are off campus.

**Maintaining professional boundaries between Staff and Students**

The University recognises that personal interaction between students and staff, particularly academic staff, is key to a student’s educational development. Whilst this rapport and communication is important and staff do need to show an interest in and care towards their students, it must be recognised that such close interaction can blur the lines between the professional and personal and lead to misunderstanding.

Staff should be aware that the following situations can be misconstrued and so are not without risk. Therefore, to protect both parties, staff are strongly advised to maintain clear professional boundaries and to consider carefully before:

* Meeting a student one-to-one outside of office hours and/or off campus, particularly where alcohol may be available
* Corresponding with a student one-to-one on anything unrelated to the student’s course of study or their university residence
* Befriending and communicating with a student on a personal basis via any social media channels
* Sharing their personal information or problems with a student
* Physically comforting/embracing a student and/or using terms of endearment
* Giving a student a gift or lending or borrowing items/money to or from a student.

Staff must also:

* Acknowledge and respect that it is perfectly acceptable for a student to deem the above interactions as out of the ordinary and/or inappropriate and so fully within their right to decline
* Respect and consider cultural and language differences which could lead to miscommunication and misunderstanding of, for example gestures, words, jokes, ‘banter’ etc
* Be mindful that it is a criminal office for someone in a position of trust to engage in any sexual activity with a person under 18 years of age to whom that trust is extended.

**Guidance on unacceptable behaviour towards students:**

Please note that the below is not an exhaustive list of examples:

* Physical touching, that could be construed as sexualised (e.g. touches of the shoulder or squeezes of the leg), or comments or questions of a sexual nature (whether verbally or electronically)
* Paying undue special attention to a particular student which may be seen as grooming
* Accepting gifts from a student, unless it is following final assessment completion and deemed to be a minor token of thanks
* Inviting an individual student to your private home or room, or visiting their home or room, including while at conferences, overseas trips, or on placement
* Asking a student to care for your child, or to house sit whilst on holidays, or perform any other personal services or work-related duties.

**To maintain appropriate relationships with students, and to help reduce the risk of sexual misconduct, abuse of power or conflict of interest, staff should:**

* Maintain an appropriate physical and emotional distance from students and perform their university duties in the best interests of the University without favour towards any individual student over another student.
* Avoid creating special friendships with students as this may be seen as grooming.
* Use a university email account, University telephone, University software and applications and internet access for communications with student avoiding personal messaging or use of any other forms of digital messaging (such as through Messenger or X.
* Set an example by writing and communicating with students in a professional and business style. Any email sent to a student or a colleague about a student may be disclosed to the student or their legal representative, for example under data protection law.
* Give careful consideration before giving their personal mobile phone number to a student. Sometimes it may be unavoidable, for example when they are arranging and taking part in conferences or organising field trips. University of Wolverhampton communication channels such as email or Microsoft Teams should be used as an alternative but may not always be practicable. Staff are encouraged to use their work telephone numbers which may be diverted to the staff member’s personal mobile.

**Where staff have a primary role of providing supervision, teaching, or pastoral care to students (including personal tutors), staff should:**

* Ensure that meetings and discussions occur on campus or other University-approved premises and formally recorded in colleagues’ diaries and any notes taken are to be typed up and retained in a word document or email folder.
* Refer students with support needs to a relevant University support service and limit your role in providing personal support to a student where this is not part of your employment duties.
* Refrain from contacting students outside of reasonable working hours.
* Not seek personal information from a student except as relevant to a university process (e.g. medical information for special consideration, or personal circumstances information as part of an academic progress process).

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

Members of staff must not be in, or enter, 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.

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 in the United Kingdom, 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.

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 has a safeguarding obligation to inform the [Safeguarding Team](https://www.wlv.ac.uk/about-us/corporate-information/safeguarding/) via [safeguarding@wlv.ac.uk](mailto:safeguarding@wlv.ac.uk) who may then contact the local authority designated officer and/or the police. Failure to report may lead to disciplinary action and be considered as gross misconduct.

**Inappropriate and Unacceptable Behaviour**

The University will not tolerate any form of sexual harassment, i.e. any unwanted conduct related to the protected characteristic of gender which has the purpose or effect of violating an individual’s dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that individual.

It therefore considers the following to be examples of behaviour which are inappropriate and unacceptable, and which could lead to disciplinary action:

* Any form of unwanted physical contact
* Unwelcome attention or advances of a romantic or sexual nature, in person or in writing (including electronic communication such as text, email or social media posts)
* Use of sexually suggestive images and/or language
* Coercion i.e. attempts to persuade someone to do something, e.g. engage in intimacy, through use of force or threat of something not being granted or being withdrawn
* Suggestion of reward/privilege for sexual favours
* Grooming or predatory behaviour.

20 Training

Training relating to this policy and briefing will be made available in a range of formats according to the needs of the trainee and different groups of staff, students and others.

21 Supporting Information and Resources

* Disciplinary Policy
* Safeguarding Policy
* Grievance Policy
* Conflict of Interest Policy
* Student Code of Conduct

Please see link to view University Policies: [WLV Policies - University of Wolverhampton](https://www.wlv.ac.uk/about-us/corporate-information/wlv-policies/).

Please see link to view the Safeguarding Page: <https://www.wlv.ac.uk/about-us/corporate-information/safeguarding/>

Please see link for Student Code of Conduct: <https://www.wlv.ac.uk/current-students/conduct-and-appeals/student-conduct/>

Further Support and Guidance Links:

[Student Life - University of Wolverhampton](https://www.wlv.ac.uk/university-life/student-life/)

[Conduct and Appeals - University of Wolverhampton](https://www.wlv.ac.uk/current-students/conduct-and-appeals/)

22 Amendments

This Policy was approved by the University’s Executive Board in November 2024. The University may change this Policy at any time, and where appropriate. Where a policy is not due for review, but is found to require updating, it will remain published, unless the reasons for review render it obsolete.

23 Contact

For any queries, guidance and support relating to this policy please contact Dr Clare Dickens, Director of Student Life and University Designated Safeguarding Lead: Email: [clare.dickens@wlv.ac.uk](mailto:clare.dickens@wlv.ac.uk).

For general queries, please contact the Corporate Compliance Team via email: [compliance@wlv.ac.uk](mailto:compliance@wlv.ac.uk).

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| --- | --- | --- | --- |
| **VERSION** | 1.0 | **AUTHOR/OWNER** | Human Resources and Student Life |
| **Approved Date** | Approved November 2024  Policy in effect from 27th January 2025 | **Approved By** | University Executive Board (UEB) |
| **Review Date** | November 2027 |  |  |

APPENDICES (To follow)

**Appendix A: Risk Assessment:**

Disclosure of intimate or familial relationship or close friendship between a staff member and a student

**Appendix B: Risk Assessment:**

Disclosure of intimate or familial relationship between staff

APPENDIX A



|  |  |  |  |  |
| --- | --- | --- | --- | --- |
|  | | **DISCLOSURE OF INTIMATE OR FAMILIAL RELATIONSHIP OR CLOSE FRIENDSHIP BETWEEN A STAFF MEMBER AND A STUDENT – RISK ASSESSMENT** | | |
| This form should be used to assess and record any real or perceived conflict of interest when a staff member discloses that they are, or have been, intimately involved with a current or incoming student. This will include any familial relationships as defined by the Policy. Once complete, the record should be forwarded by email to the relevant HR Business Partner and,[safeguarding@wlv.ac.uk](mailto:safeguarding@wlv.ac.uk) and a copy given to the staff member. For cases where there is a staff and student relationship disclosure, must be included in the assessment process.  If you require any support with this document, please contact your HR Business Partner. | | | | |
| **Section 1: Staff Details:** | | | | |
| Name: |  | | Faculty/School/Department: |  |
| Job Title: |  | | Date of Disclosure: |  |
| Nature of the Relationship being disclosed: |  | |
| **Section 2: Student Details:** | | | | |
| Student name: |  | | Student Status: | * Undergraduate: * Postgraduate: * Other   (please provide details in Section 4 below) |
| Assessment Undertaken by: |  | | Date: |  |

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| **Section 3: Assessment** | | | |
| **Conflict of Interest Assessment**  **Is/will the member of staff be directly involved in:** | **YES** | **NO** | **If ‘Yes’, detail the measures which will be put in place to remove the conflict and protect both parties, by whom and when.** |
| Any aspect of the student’s learning? |  |  |  |
| Marking or any assessment of the student’s work |  |  |  |
| Any aspect of the student’s pastoral care |  |  |  |
| Any decision-making process regarding the student’s academic progress? |  |  |  |
| Selecting the student for a course of study? |  |  |  |
| Any aspects of the student’s research? |  |  |  |
| Any aspect of their non-academic life on campus? |  |  |  |
| Any other aspect of the student’s learning experience? |  |  |  |
| Section 4: Any other relevant information: | | | |
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APPENDIX B

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| --- | --- | --- | --- | --- |
|  | | **DISCLOSURE OF INTIMATE OR FAMILIAL RELATIONSHIP BETWEEN STAFF – RISK ASSESSMENT** | | |
| This form should be used to assess and record any real or perceived conflict of interest when a staff member discloses that they are, or have been, intimately involved with a fellow member of staff. This will include any familial relationships as defined by the Policy. Once complete, the record should be forwarded by email to the relevant HR Business Partner and a copy given to the staff member.  If you require any support with this document, please contact your HR Business Partner. | | | | |
| **Section 1: Staff Details:** | | | | |
| Name: |  | | Faculty/School/Department: |  |
| Job Title: |  | | Date of Disclosure: |  |
| Nature of the Relationship being disclosed: |  | |
| **Section 2: Relationship Details:** | | | | |
| In a relationship with (staff member’s name): |  | | Faculty/School/Department: |  |
| Job Title: |  | | Line Management /supervisory connection? |  |
| Assessment Undertaken by: |  | | Date: |  |

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| --- | --- | --- | --- |
| **Section 3: Assessment** | | | |
| **Conflict of Interest Assessment**  **Is/will the member of staff be directly involved in:** | **YES** | **NO** | **If ‘Yes’, detail the measures which will be put in place to remove the conflict and protect both parties, by whom and when.** |
| Recruitment / selection of staff member? |  |  |  |
| Promotion / Reward / other recognition recommendations? |  |  |  |
| Annual Review? |  |  |  |
| Delegation/allocation of work? |  |  |  |
| Approval of travel / attendance at conferences / expenses etc.? |  |  |  |
| Performance Management? |  |  |  |
| Accompaniment at formal meetings? (e.g. grievance, flexible working) |  |  |  |
| Any other management / supervisory activity? |  |  |  |
| Section 4: Any other relevant information: | | | |
|  | | | |