UKMC

Personal Relationships Policy

Date	Author	Summary of Changes	Version	Authorised
15 October 2026	HR	New policy developed to replace the Staff Student Relationships Policy, expanding coverage to personal relationships, conflicts of interest, disclosure requirements, safeguarding, harassment, sexual misconduct and abuse of power, in line with OfS Condition E6.	2	Q&S Chairs Action Pending Academic Board approval

Policy/Procedure Management and Responsibilities	
Policy/Procedure Owner	The policy is overseen by the Head of HR. Day-to-day implementation and communication responsibilities are delegated to HR Team.
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Linked Documents and Policies Internal	Staff Portal
Dissemination Plan	This policy is a HR departmental policy and will be disseminated through departmental training/
Accessibility	**Alternative formats available on request to** quality@ukmc.ac.uk

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Policy Statement

UK Management College is committed to fostering a safe, professional, inclusive and respectful environment in which students and employees are treated with dignity and respect.

The College recognises that personal and intimate relationships may develop between members of its community. Whilst such relationships are generally private matters, there are circumstances in which they may give rise to actual, potential or perceived conflicts of interest, safeguarding concerns, abuses of power, or questions regarding impartiality and professional judgement.

This policy establishes the principles and procedures for identifying, declaring and managing such risks whilst respecting individuals' rights to private and family life.

The College is committed to taking proportionate and reasonable steps to protect students from harassment, sexual misconduct, abuse of power and conflicts of interest in accordance with Office for Students Condition E6 (Harassment and Sexual Misconduct). The policy forms part of the College's wider framework for ensuring student safety, wellbeing and academic integrity.

Purpose

This policy aims to:

- Protect students and employees from actual or perceived abuses of power.
- Prevent conflicts of interest that may compromise professional objectivity.
- Safeguard the wellbeing of students and vulnerable individuals.
- Promote confidence in academic and employment-related decision-making.
- Ensure compliance with legal and regulatory obligations.
- Provide clear expectations regarding the disclosure and management of personal relationships.
- Support a culture of professionalism, fairness and accountability.

This policy applies to:

- Employees.
- Agency workers.
- Casual workers.
- Consultants and contractors.
- Visiting academics.
- Volunteers.
- Apprentices.
- Governors and trustees.
- Any person undertaking duties on behalf of the College.

References to "employees" throughout this policy shall include all categories listed above unless otherwise stated.

Legal and Regulatory Framework

This policy has been developed with reference to:

- Equality Act 2010
- Employment Rights Act 1996
- Protection from Harassment Act 1997
- Human Rights Act 1998
- Data Protection Act 2018
- UK General Data Protection Regulation (UK GDPR)
- Safeguarding Vulnerable Groups Act 2006
- Office for Students Condition E6



Nothing in this policy shall override any statutory rights or legal obligations.

In applying this policy, the College will:

- Respect individuals' rights to private and family life.
- Act fairly, reasonably and proportionately.
- Protect students from abuse of power and conflicts of interest.
- Maintain academic integrity and public confidence.
- Comply with principles of natural justice and procedural fairness.
- Consider each case on its individual circumstances.

Any action taken under this policy shall be proportionate, necessary and justified by a legitimate organisational objective, including safeguarding, student welfare, regulatory compliance, academic integrity and the prevention of conflicts of interest.

Definitions

Intimate Personal Relationship

A consensual romantic, emotional or intimate relationship, regardless of duration.

Close Personal Relationship

A relationship involving:

- A spouse;
- Civil partner;
- Partner;
- Family member;
- Member of the same household;
- Close friend; or
- Any person with whom there is a significant personal or financial association.

Conflict of Interest

A situation in which an individual's personal interests, relationships or associations may compromise, or reasonably appear capable of compromising, their professional judgement, objectivity or decision-making.

Abuse of Power

The inappropriate use of authority, influence, trust or professional position for personal advantage or to influence another individual.

In assessing whether an abuse of power may have occurred, the College shall have regard to any actual or perceived imbalance of authority, dependency, influence, vulnerability or professional standing and shall not rely solely on whether a relationship is described as consensual.

Position of Authority

- Teaching
- Supervision
- Assessment
- Academic decision-making
- Recruitment
- Management
- Performance review
- Disciplinary authority
- Student support
- Pastoral care
- Mentoring
- Allocation of opportunities or

Professional Responsibilities

All employees are expected to:

- Maintain appropriate professional boundaries.
- Act with integrity and impartiality.
- Avoid actual or perceived conflicts of interest.
- Declare relationships where required by this policy.
- Conduct themselves in a manner that maintains trust and confidence in the College.



Employees must not allow personal interests or relationships to improperly influence decisions affecting students, colleagues or the College.

Staff – Student Relationships

General Principle

The College recognises that intimate personal relationships between employees and students may create significant risks, including:

- Actual or perceived conflicts of interest;
- Abuse of authority or influence;
- Compromised academic judgement;
- Reputational damage;
- Risks to student welfare and confidence.

Accordingly, employees must not enter into or continue an intimate personal relationship with a student where they exercise or may reasonably be perceived as exercising professional influence over that student.

Prohibited Circumstances

An employee must not enter into or continue an intimate relationship with a student where the employee:

- Teaches the student;
- Assesses the student;
- Supervises the student;
- Provides pastoral or welfare support to the student;
- Exercises disciplinary authority over the student;
- Has responsibility for decisions affecting the student's academic progression, opportunities or outcomes; or
- Otherwise occupies a position of authority in relation to that student.

Existing Relationships

Where an intimate relationship existed prior to:

- A student's enrolment; or
- An employee assuming professional responsibility for the student,

the employee must disclose the relationship immediately to Human Resources.

The College will assess the circumstances and implement reasonable safeguards to eliminate or mitigate any conflict of interest.

Students Under 18 and Vulnerable Adults

Relationships involving students under the age of 18 or vulnerable adults will be treated as safeguarding matters and managed in accordance with the College's safeguarding obligations.

Relationships Between Employees

The College recognises that consensual relationships may arise between employees.

Where such a relationship creates or may create a conflict of interest, employees must disclose the relationship to Human Resources.

Disclosure is particularly required where:

- A reporting relationship exists
- One employee manages another
- One employee influences decisions concerning another employee
- There is potential for a perception of favouritism, bias or preferential treatment

Disclosure Obligations

Employees must promptly disclose:

- Any relationship that may create a conflict of interest;
- Any staff-student relationship falling within the scope of this policy;
- Any change in circumstances that may affect an existing risk assessment.

Disclosures should be made to:

- Human Resources; and
- The relevant line manager where appropriate.

A disclosure under this policy does not of itself imply wrongdoing.



The purpose of disclosure is to enable the College to assess risk and implement appropriate safeguards.

Risk Assessment and Management

Upon receiving a disclosure, the College shall undertake a documented risk assessment.

The assessment may consider:

- Actual or perceived power imbalances;
- Student vulnerability;
- Academic influence;
- Access to confidential information;
- Reporting relationships;
- Safeguarding considerations;
- Operational implications;
- Reputational risks.

Following assessment, the College may implement reasonable measures including:

- Changes to reporting structures;
- Alternative supervision arrangements;
- Removal of assessment responsibilities;
- Reallocation of managerial responsibilities;
- Independent oversight arrangements;
- Other proportionate control measures.



The College reserves the right to implement any reasonable management action necessary to manage identified risks.

Harassment, Sexual Misconduct and Abuse of Power

The College does not tolerate:

- Harassment
- Sexual harassment
- Sexual misconduct
- Abuse of power
- Coercive behaviour
- Grooming
- Victimisation
- Retaliation
- Stalking

Allegations may be investigated under the appropriate College procedure and may result in disciplinary action.

The College recognises that relationships may involve an abuse of power even where consent is asserted if significant imbalances of authority or dependency exist.

Reporting Concerns

Students and employees may raise concerns regarding:

- Conflicts of interest
- Boundary breaches
- Harassment
- Sexual misconduct
- Abuse of authority
- Improper conduct under this policy

Reports may be made through:

- Human Resources
- Student Services
- The Safeguarding Team
- A line manager

- Whistleblowing arrangements
- Formal complaints procedures

Individuals who raise concerns in good faith shall not be subjected to detriment or victimisation.

Investigations

Where concerns arise under this policy, the College may undertake an investigation in accordance with its relevant procedures.

Investigations shall:

- Be conducted fairly and impartially;
- Respect confidentiality where appropriate;
- Consider all relevant evidence;
- Allow individuals a reasonable opportunity to respond to concerns raised.

No decision shall be predetermined, and each matter shall be assessed on its own facts.



The College will normally apply the civil standard of proof when determining findings under this policy; namely whether it is more likely than not that the alleged conduct occurred.

Safeguarding

The College has a legal duty to safeguard children and vulnerable adults.

Any concern involving:

- Students under 18;
- Vulnerable adults;
- Exploitation;
- Grooming;
- Coercive behaviour;
- Abuse of power;

must be reported immediately to the Designated Safeguarding Lead.



The College may refer matters to external agencies where required by law or safeguarding obligations.

Support for Students

Students affected by matters falling within the scope of this policy will have access to appropriate support services.

Such support may include:

- Student wellbeing services;
- Counselling;
- Safeguarding support;
- Academic adjustments where appropriate;
- Independent guidance and advice.



The provision of support does not predetermine the outcome of any investigation or procedure.

Freedom of Speech and Academic Freedom

Nothing within this policy shall be interpreted as restricting lawful freedom of speech or academic freedom.

The College will balance its obligations to protect students from harassment and sexual misconduct with its legal obligations relating to freedom of expression and academic freedom.

Training

The College will provide appropriate training for employees whose roles include:

- Student engagement;
- Safeguarding responsibilities;
- Investigations;
- Management responsibilities;
- Decision-making under relevant procedures.

Training may include:

- Professional boundaries;
- Conflict of interest management;
- Safeguarding;
- Harassment and sexual misconduct;
- OfS Condition E6 requirements

Non-Disclosure Agreements

The College will not enter into any agreement that seeks to prevent or restrict a student from disclosing, reporting or discussing allegations of harassment or sexual misconduct, except where expressly permitted by law.

Confidentiality and Data Protection

The College will process personal information obtained under this policy in accordance with UK GDPR and the Data Protection Act 2018.

Information will be shared only where reasonably necessary for:

- Risk management
- Safeguarding

- Investigation processes
- Regulatory compliance
- Legal obligations



Absolute confidentiality cannot be guaranteed where disclosure is required by law, regulatory obligations or safeguarding duties.

Breach of Policy

Failure to comply with this policy may result in action under the relevant College procedures.

The following conduct is likely to be regarded as potential misconduct and may be treated as gross misconduct where the circumstances justify such action:

- Deliberate concealment of a relationship giving rise to a conflict of interest;
- Abuse of authority or position;
- Harassment or sexual misconduct;
- Failure to comply with reasonable management measures imposed under this policy;
- Victimisation or retaliation against an individual who has raised concerns;
- Conduct that creates a serious safeguarding risk.

Any disciplinary action will only be taken following a fair process and in accordance with the College's Disciplinary Procedure.

Monitoring and Review

The College will periodically review:

- Relationship disclosures
- Risk management arrangements
- Harassment and misconduct trends
- Safeguarding concerns
- Training effectiveness

This policy will be reviewed annually and updated as necessary to ensure continued legal and regulatory compliance, including compliance with Office for Students Condition E6.