

Relationships Policy and Guidelines



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This policy will be reviewed periodically to ensure compliance with changes in employment law and equality and diversity legislation. In the event that this policy or procedure or guidelines is not so compliant, the relevant legislation shall prevail.

Changes to this policy will be subject to consultation and agreement with the University's recognised Trade Unions before implementation

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POLICY

1. Scope and Purpose of Policy

- 1.1. Student and staff safety is of utmost importance to Brunel University. The University wishes to ensure that it provides a constructive work and study environment in which staff and students feel safe and free from any form of harassment.
- 1.2. The purpose of this policy is to provide guidance and expectations to staff and students (including doctoral researchers), regarding personal relationships, to avoid any actual or potential conflicts of interest, misuse of authority, or allegations of inappropriate conduct etc. It covers relationships between staff members as well as relationships with staff and students.
- 1.3. This policy applies to:
 - 1.3.1. The following members of staff:
 - 1.3.1.a. Employees of the University including employees based overseas
 - 1.3.1.b. Workers engaged by the University including those on temporary contracts (agency, placement and job shop contracts) or consultancy contracts.
 - 1.3.2. Students on programmes provided directly by or on behalf of Brunel, including Doctoral Researchers (where they are not directly employed by the University).
- 1.4. The University values the diversity of its people and is committed to promoting equity and eliminating discrimination. This policy is underpinned by the Equality Act 2010 and will be applied fairly and consistently and this will be monitored to ensure that discrimination and inequity does not occur.
- 1.5. The University will operate this policy under the principles of our [Values](#) - Open, Courageous and Inventive.
- 1.6. The policy recognises the requirements of the Office for Students (OfS) E6 Condition: Harassment and sexual misconduct.
- 1.7. The policy operates in line with the University's [single comprehensive source of information](#).

2. Principles

- 2.1. The University recognises the importance of preserving the integrity of professional relationships between members of staff, as well as with students. This also applies to professional and ethical relationships with consultants, committee members, contractors and/or suppliers.
- 2.2. The policy recognises that relationships may exist between staff and staff, or between staff and students, and there may be circumstances where a member of staff will need to make a declaration and withdraw from undertaking certain roles or activities and decision making as part of their work at Brunel.
- 2.3. This policy also outlines the requirement for students to declare relationships with staff so that the University can consider whether there is a potential or actual conflict of interest or conflict of loyalty, or potential or actual abuse of power, and whether alternative arrangements need to be made for that student.

- 2.4. This policy recognises an individual's rights to a private life and family life as set out in Article 8 of the European Convention on Human Rights (ECHR) and takes a reasonable and proportionate approach to balance these rights against the University's legitimate organisational interests and other legal and regulatory obligations.
- 2.5. Under this policy, Brunel does not allow the initiation of intimate personal relationships between relevant staff members and students. 'Intimate personal relationships' is defined in section 3 below.
- 2.6. The policy aims to protect staff and students from harassment and sexual misconduct and ensure that individual members of staff are clear on expectations to protect them from allegations of impropriety, bias, abuse of power or authority or conflict of interest, and act in a fair, honest, ethical, transparent and professional manner at all times in all their work activities and they follow all relevant policies and make declarations as appropriate. It is recognised that power dynamics may be experienced differently across gender, race, disability, class, or other identities, and that the University is committed to ensuring these complexities are considered in both policy implementation and any investigations.
- 2.7. Staff should be aware that unwanted attention or inappropriate conduct could be perceived as bullying or harassment, sexual harassment/sexual misconduct, intimidation or lead to allegations of unfair treatment whether positive or negative. Further, sexual relationships that are not freely entered into are recognised by the University as a form of sexual abuse and harassment. The University, with the support of trained investigators, will investigate any such complaints or allegations and take the relevant action in light of the findings.
- 2.8. Other relevant policies, including how to report incidents or concerns, are as follows:
- [Sexual Violence and Sexual Harassment Policy](#)
 - [Dignity at Work Policy](#)
 - [Conflict of Interests Policy](#)
 - [Anti-Bribery Policy](#)
 - [Gifts and Hospitality Policy](#)
 - [Equality, Diversity and Inclusion Policy](#)
 - [Data Protection Policy](#)
 - [Public Interest Disclosure \(Whistleblowing\) Procedure](#)
 - [Safeguarding Children and Vulnerable Groups – Policy and Guidance](#)
 - [Disciplinary Policy and Procedure \(Employees\)](#) or [Disciplinary Procedure for Consultants, Student Workers and Hourly Paid Workers](#)
 - [Student Complaints Procedure](#)
 - [Academic Misconduct Procedure](#)
 - [Fitness to Practice Procedure](#)
 - [Senate Regulation 16: Precautionary Action](#)
 - [Bullying & Harassment Policy](#)
 - [Online Harassment Policy](#)
- 2.9. All individuals (staff and students) have the responsibility to be alert to and recognise situations in which they have a conflict of interest or might reasonably be seen by others to have a conflict, and to make a declaration.

3. Definitions

- 3.1. In the context of this document, a relationship may be defined as:

- intimate personal relationship
- a family relationship
- close personal friend
- a legal relationship – marriage or civil partnership
- a business/commercial/financial relationship
- and could include those living in the same household

3.2. Further definitions, in line with the Office for Students Condition of Regulation E6 Harassment and Sexual Misconduct, are as follows:

3.2.1. **‘intimate personal relationship’** means a relationship that involves one or more of the following elements:

- (i) physical intimacy including isolated or repeated sexual activity; or
- (ii) romantic or emotional intimacy.

3.2.2. **‘excluded relationships’** means any ongoing intimate personal relationship that:

- (i) existed before 1 August 2025 and that remains in existence; or
- (ii) existed before the date that the staff member became a relevant staff member in relation to that student.

3.2.3. **‘relevant staff member’** means a member of staff who has direct academic responsibilities, or other direct professional responsibilities, in relation to that student.

3.2.3.a. At Brunel this is defined as staff members with:

- Academic responsibilities, or other direct professional responsibilities include, but not limited to, admission, assessment, academic progress, supervision, tutoring, teaching, mentoring, pastoral care or the award of any studentship, prizes or other grants to the student.

This may also include:

- senior members of staff with responsibility or oversight of wider institutional strategy, processes and delivery
- security staff
- staff with out of hours responsibilities
- staff that have access to student accommodation
- relationships where a member of staff has access to personal data or is involved in recruitment/admission or other educational activity that may impact on a student, whether in an advantageous or negative way.

3.2.4. **‘abuse of power’** means a situation where a relevant staff member exploits a position of power in relation to a student so as to apply pressure in a way which:

- (i) may result in the student doing something, or refraining from doing something, that they may not have otherwise done; and
- (ii) that action or inaction could reasonably result in something that falls within the scope of an intimate personal relationship.

4. Staff Relationships

- 4.1. The University values the integrity of professional relationships and in order that the University's business is also perceived to be conducted in a professional manner it is necessary to distinguish between, and take account of, personal relationships/close friendships which overlap with professional ones and where conflicts of interest and/or conflicts of loyalty may arise.
- 4.2. All staff, regardless of position or seniority, are under a duty to declare relationships which give rise to an actual, potential, or perceived conflict of interest and/or conflict of loyalty, and to recognise and disclose activities that might give rise to conflicts of interest or the perception of conflicts and to ensure that such conflicts are seen to be properly managed or avoided. Please see the [Conflict of Interest Policy](#) for more information.
- 4.3. Such conflicts may arise for instance, but are not limited to:
- participation in the appointment, recruitment, promotion, supervision, data processing or evaluation of a person with whom the staff member has a relationship.
 - the authorisation of financial payments, allocation of funding, or procurement of goods and services where the member of staff has a relationship with the requester or third party.
- 4.4. Staff must, therefore, take proper care that any conflict of interest (actual, potential, or perceived) does not arise from their position, or relationships within the University or membership of or connection with other bodies and individuals outside the University.
- 4.5. Where a relationship exists or existed or emerges between members of staff who are in a line management or supervisory relationship at work, or a position outside the management structure but with the potential for conflict to arise, they must not be involved in management activities or processes involving the other party, including business relationships, unless it is declared in accordance with section 7 and 8 of the [Conflict of Interest Policy](#) and can be robustly managed.
- 4.6. Where any member of staff feels that there is a possible or actual abuse of power/authority or conflict of interest relating to a declared personal relationship, they should raise this with their Head of Department or Human Resources in the first instance or follow the applicable University Policy as above.
- 4.7. Management Responsibilities
- 4.7.1. If a relationship as outlined in sections 4.2 to 4.6 above exists or develops, this must be declared in accordance with section 7 and 8 of the [Conflict of Interest Policy](#).
- 4.7.2. The escalation route for reviewing disclosed possible or actual conflicts of interest is as follows:
- Heads of Departments (or equivalent) will review possible or actual conflicts of interest disclosed by staff in their departments and relevant heads of professional service functions will review possible or actual conflicts of interest disclosed by staff in their departments.
 - Executive Deans will review possible or actual conflicts of interest disclosed by Heads of Departments (or equivalent) in their faculty.
 - Pro Vice Chancellors, the COO, the CFO, the Deputy Vice-Chancellor and the Chief People and Culture Officer will review possible or actual conflicts of interest disclosed by Deans or relevant heads of professional services functions that relate to their functional area.
 - The Vice-Chancellor & President will review possible or actual conflicts of interest disclosed by Pro Vice Chancellors, the COO, the CFO, the Deputy Vice-Chancellor and

the Chief People and Culture Officer

- The Chair of Council will review possible or actual conflicts of interest disclosed by the Vice-Chancellor & President.
- The research supervisor of the student will review possible or actual conflicts of interest disclosed by a student, or where the possible or actual disclosed conflict of interest involves the research supervisor and the student, the Head of Department (or equivalent) will review the possible or actual disclosed conflict of interest; and
- If the person named as the reviewer of a possible or actual disclosed conflict of interest in the above escalation route also has a possible or actual conflict of interest in the matter disclosed, then the matter will be referred for review to the next level of authority

4.7.3. (the “Reviewer(s)”).

- 4.7.3.a. The relevant Reviewer will review the possible or actual disclosed conflict of interest and if it is determined that there is a possible or actual conflict of interest, agree how the conflict of interest can be actively managed through a Conflict Management Plan (as set out in the [Conflict of Interest Policy](#)).
- 4.7.3.b. If a member of staff is uncertain as to whether or not they may be in a situation whereby a potential conflict of interest, misuse of authority or allegations of impropriety, etc. could be raised, or a manager is uncertain as to the action they should take, they should seek guidance from Human Resources and/or the University Secretary and General Counsel.
- 4.7.3.c. The Reviewer will deal with the situation in a manner that protects the dignity and privacy of all parties, and those involved will be expected to comply with any reasonable decision or action. There will be no obligation on the parties involved to keep their relationship confidential.
- 4.7.3.d. Applicants for employment within the University will be asked to declare if they are related to any member of the University Council, member of staff or student. The existence of a relationship between an applicant and a member of staff will not bar an application for employment, but relationships must be declared. Where a relationship at work might impact a career move for one or other of the parties involved, the University will attempt to find a solution to robustly manage this situation e.g. a different reporting line, however this may not be possible on all occasions.

5. **Relationships between Staff and Students**

- 5.1. The University believes that the professional relationship between a student and a member of staff, whether teaching or research based, is crucial to a student's educational development and acknowledges that the teaching relationship must be based on trust, confidence and effective communication. This also applies to professional staff who have professional or pastoral responsibilities for students.
- 5.2. The requirements of this policy are not intended to prohibit staff from discharging their professional, pastoral or academic responsibilities within appropriate professional boundaries. For example, a staff member may necessarily have physical contact with a student as part of their academic role (e.g. modelling appropriate physiotherapy techniques) or a personal connection with a student as part of their academic or professional role (for example, as a personal tutor or as a counsellor). The definition of ‘intimate personal relationship’ in paragraph 3.2.1 includes reference to ‘emotional intimacy’ and this should not prevent a member of staff engaging compassionately and considerately with a student on a professional basis. This may be particularly important when engaging with students in distress. Staff should be aware that ‘emotional intimacy’ formed through grooming

behaviours, could result in, or constitute, abuse of power.

- 5.3. All relationships which may give rise to an actual, potential, or perceived conflict of interest or conflict of loyalty between staff and students **must be** declared in accordance with the Conflict of Interests Policy. This requirement to report applies to both staff and students. For students, please see section 7.2 for more information about the obligation to report and how to do this.
- 5.4. Existing relationships which may give rise to an actual or potential conflict of interest must be declared by the student and staff member at the point the student applies for a place at the University, or at the point it comes into existence. The obligation to declare is a continuing one, so new relationships which may give rise to an actual, potential, or perceived conflict of interest must be declared immediately to the relevant Reviewer.
- 5.5. Except for excluded relationships, which must in any event be declared to the University, relevant staff members (see definition section 2) must not enter into an intimate personal relationship with a student for whom they have direct academic responsibilities or other direct professional responsibilities in relation to that student.
- 5.6. In accordance with the Conflict of Interests Policy, should an intimate personal relationship be in place between a student and a relevant staff member, the staff member and student must inform their relevant reviewer of the potential or actual conflict of interest so that alternative arrangements for teaching, tutoring, supervision, assessment or other relevant activities can be considered.

6. Students following Programmes of Study with External Partners or on Placements

- 6.1. In line with point 1.3.2, this policy also applies to any programmes provided by external partners on behalf of the University.
- 6.2. Where it is determined there is an intimate personal relationship with a relevant staff member, who may be acting as or on behalf of an external partner for the University, the guidelines under section 5 above will be applicable.
- 6.3. If staff become aware of relationship between a student and a person who is acting on behalf of or in collaboration with the University, such as a placement educator/tutor/ supervisor or any other external partner, they should advise the student to declare this to their Programme Lead or Head of Department. This also applies to students on programme placements (such as industry placements). This will be reviewed in line with the [Conflict of Interest Policy](#).
- 6.4. If a student is experiencing unwanted advances or sexual harassment from such an outside partner, they should report this to their Head of Department.
- 6.5. Managers and staff who are uncertain about whether they should take the action indicated above, should seek guidance on a confidential basis, from Human Resources and/or the University Secretary and General Counsel.

7. Management Responsibilities

- 7.1.1. If a relationship is reported to a Reviewer, they must take the steps set out in the [Conflict of Interest Policy](#) as early as possible, in particular if it is determined that there is a possible or actual conflict of interest, implementing a Conflict Management Plan.
- 7.1.2. In the case of a student whose studies or research are in a very specialised area, such that

no alternative tutor or supervisor is available, the Reviewer should make arrangements to engage a co-supervisor or external supervisor, in order to ensure that the member of staff does not have sole responsibility for supervising the student's work or for taking decisions that affect the student.

- 7.1.3. The Reviewer will deal with the situation in a manner that protects the dignity and privacy of all parties, and those involved will be expected to comply with any reasonable decision or action. There will be no obligation on the parties involved to keep their relationship confidential.

7.2. Guidance for Students on Relationships and the need for Disclosure

- 7.2.1. The University advises students **not to** have a relationship with a relevant staff member as it may lead the staff member to compromise the integrity of their professional relationship. (For the purpose of this policy, 'relationship' and 'relevant staff member' are defined in section 3). If such a relationship develops, students **must** independently advise their Reviewer without delay in accordance with the [Conflict of Interest Policy](#).
- 7.2.2. Students can report and seek support for harassment or sexual misconduct that occurs within a relationship with a staff member, regardless of whether that relationship is permitted under the policy. Furthermore, students will not be penalised for participating in a relationship with a relevant staff member and will be protected from retaliation by the staff member if they report harassment or sexual misconduct.
- 7.2.3. If students are unsure if they should report a relationship, they should seek advice from the Programme Lead or Head of Department.

8. Working with Children and Vulnerable Adults

- 8.1. The University is committed to safeguarding children and vulnerable adults, ensuring that any concerns are taken seriously and handled sensitively, with due regard for the rights and wellbeing of all individuals involved. The University has a [Safeguarding Children and Vulnerable Groups – Policy and Guidance](#) which provides guidance on Safeguarding Children and Vulnerable Groups for staff who may come into contact with under-18s or vulnerable groups in the course of their work. This provides a Code of Behaviour and Good Practice, and the following general principles should be adhered to by all staff:

- Safeguarding issues are to be regarded as top priority and staff are reminded that it is the welfare of the child or vulnerable group which is of primary concern, and it is their duty to report any concerns to a Designated Safeguarding Officer.
- If staff, in the course of their work at the University, have a child or vulnerable group protection issue brought to their notice, observe an incident of abuse themselves, or have cause for concern, they must treat this as a priority over other work and address the issue immediately. If staff wish to seek guidance with regard to a specific incident or area of concern, advice can be sought from the Designated Safeguarding Officers who may refer the matter to the Principal Safeguarding Officer or the local authority's Safeguarding Children Board/Social Care.

Further information including details of our Safeguarding Officers, can be found on the [University Safeguarding page](#).

9. Non-consensual Relationships or Inappropriate Behaviour

- 9.1. If any student finds themselves in receipt of unwanted or inappropriate behaviour or involved in a relationship that they do not consider to be truly consensual, or if they consider that they

have been adversely affected by a misuse of power, authority, or conflict of interest, they can raise this through the [Report and Support platform](#) or as a formal concern under the Student Complaints Procedure. Information about reporting incidents of harassment and sexual misconduct by staff can be found in the [single comprehensive source of information](#).

- 9.2. Members of staff who experience unwanted advances and other unwelcome behaviour should follow the [Dignity at Work Policy](#).

10. Declarations

- 10.1. All declarations should be treated in confidence, recorded in CHIME and placed on the staff member's personal file within Human Resources, as well as recorded as appropriate within the Department and College.
- 10.2. Declarations will be kept in line with the University's [Privacy Notice and Data Protection Regulations](#). Staff who declare such a relationship should be treated fairly and with due regard to equality of treatment.
- 10.3. Where, despite due consideration to alternative arrangements, it is not practicable to remove a member of staff from a particular activity e.g. they are a required panel member, all panel members should be made aware and decisions reached should be justified as fair and equitable to avoid allegations of bias or conflict of interest.
- 10.4. In line with good practice, it is the responsibility of Panel/Committee Chairs to seek declarations of conflicts of interest at the commencement of any University decision making process.

11. Failure to Declare

- 11.1. Where a relationship (as defined above) is not declared or guidance sought from their Reviewer, Human Resources, and/or the University Secretary and General Counsel, and there has been a failure to comply with the [Conflict of Interest Policy](#), the matter will be investigated and appropriate action followed, which may result in disciplinary action being taken in accordance with either Brunel's [Disciplinary Policy and Procedure \(Employees\)](#) or [Disciplinary Procedure for Consultants, Student Workers and Hourly Paid Workers](#).

12. Training and Awareness

- 12.1. All staff will be required to complete mandatory training every 2 years which covers:
- up-to-date understanding of the content of the University's single comprehensive source of information on harassment and sexual misconduct
 - up-to-date understanding of behaviour that may constitute harassment and/or sexual misconduct.
- 12.2. Identified relevant staff will be provided with training to support students who:
- wish to make allegations or complaints about harassment and/or sexual misconduct;
 - have alleged and/or experienced incidents of harassment and/or sexual misconduct; and
 - are the actual or alleged perpetrators of incidents of harassment and/or sexual misconduct; and
- 12.3. Staff supporting investigations will be provided with training for the required knowledge and skills to undertake investigations or make decision in relation to incidents of harassment and/or sexual misconduct.
- 12.4. Staff will also be provided with relevant awareness to understand principles of Freedom of

Speech.

- 12.5. Staff will also be required to complete other University agreed mandatory training relevant to this policy, which includes, but is not limited to, Equity and Anti-Bribery training.

13. Governance and Monitoring

- 13.1. The Chief People and Culture Officer will provide an annual confidential update and risk assessment to Executive Board on declared relationships.